

**5 Year Housing Land Supply Statement for the Borough of Newcastle-under-Lyme:
Mid-2015 update covering the five year period from 1st October 2015 to 30th September
2020**

Purpose of the Report

To present updated information and results of the calculation of the 5 year housing land supply position in the Borough, taking in to account evidence on housing needs contained within the Joint Strategic Housing Market Assessment, as detailed in the accompanying Statement.

To provide guidance on the significance and impact of the 5 year supply position on the Development Management decision making process.

Recommendations

- 1) That members note the results of the mid-year update to the 5 year supply statement.**
- 2) That members note the significance of the 5 year supply position in Development Management decision making.**

Reasons

To ensure the Council makes decisions in line with up-to-date planning policy and its latest 5 year housing land supply Statement.

1.0 INTRODUCTION & BACKGROUND

- 1.1 Local planning authorities are required by the National Planning Policy Framework (NPPF) to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. Whether or not a local planning authority can demonstrate a five-year supply of deliverable housing sites is a key driver behind the increase in planning permissions granted for housing sites nationally. The consequences of not being able to demonstrate a five year supply of deliverable housing sites is that relevant housing supply policies in the adopted development plan cannot be considered as up-to-date. Members will be aware that locally this has resulted in some refused housing proposals being won at appeal that do not conform to the adopted development plan for the borough.
- 1.2 Under the NPPF and Planning Practice Guidance (PPG), the only way to definitively demonstrate beyond all doubt a five year supply of deliverable housing sites is to adopt an up-to-date Local Plan (i.e. a post-NPPF version). Without an up-to-date Local Plan, less weight can be given to the five year housing land supply figure. In other words it is open to challenge by the development industry, and may be found wanting on appeal. As Members will be aware, the Council is in the process of preparing an up to date Joint Local Plan in partnership with Stoke-on-Trent City Council. This is scheduled to be subject to independent examination and adoption in 2018.
- 1.3 The NPPF and PPG oblige local planning authorities to produce a five year housing land supply Statement and to do so on at least an annual basis. Current guidance

(the PPG) indicates that such assessments should be “made publicly available in accessible format”, and that “once published, such assessments should normally not need to be updated for a full twelve months unless significant new evidence comes to light or the local authority wishes to update its assessment earlier”.

- 1.4 Whilst this is a six month update to the five year housing land supply position in the Borough and not an annual update, there is now significant new evidence available on housing needs that is contained within the Joint Strategic Housing Market Assessment. This mid-year update also follows the resolution of the 21st July 2015 Planning Committee that “that officers give active consideration to the preparation of a revised statement following the publication of the Strategic Housing Market Assessment” and the subsequent decision of Cabinet at its meeting on the 16th September that “officers take the necessary steps to prepare a mid-year housing land supply statement”.
- 1.5 The Five Year Housing Land Supply Statement (1st October 2015- 30th September 2020) that accompanies this report presents information on the availability of land for housing development in the Borough as at 1st October 2015. The available supply of land at 1st October 2015 is projected forwards to determine the extent to which it can meet the anticipated need for housing to be developed over the next five years to 30th September 2020.
- 1.6 The calculation is now made against the individual housing need evidence for the Borough identified within the Strategic Housing Market Assessment. This is explained in more detail in section 2 of this report and section 3 of the accompanying Statement. The resulting supply of housing land is expressed in the number of years that all of the land would be used up if the different levels of housing need were to be met.

2.0 KEY FINDINGS

Objective Assessment of Housing Need

- 2.1 The Joint Strategic Housing Market Assessment presents what is defined under national planning policy as the ‘full, objective assessment of housing needs’.
- 2.2 It is called a ‘full’ assessment because it is meant to take account of all relevant social and economic factors that contribute towards driving housing need, for example population growth and the need for a working age population to support economic growth. It is also called an ‘objective’ assessment because it does not take account of planning policy considerations or local constraints to development, for example the Green Belt, or any further aspirations for stronger economic growth resulting from initiatives or strategies such as the Local Enterprise Partnership’s Strategic Economic Plan. These considerations will be taken in to account as work on the Joint Local Plan progresses and this will help to refine the full, objective assessment of housing need into a single new housing target for the Borough.
- 2.3 At this stage, it is not currently possible to measure the Borough’s supply of housing land against the ‘full, objective assessment of housing needs’ because Paragraph 47 of the NPPF states that these needs are to be met across the ‘housing market area’. This area is defined by the level of the movement of people across the areas that they live and work in. The higher the level, the stronger the linkage. The PPG suggests that when more than 70% of people move within an area then that constitutes the housing market area. The Joint Strategic Housing Market Assessment has examined the extent of the housing market area and identified that it is comprised of the local authority

areas of Newcastle-under-Lyme and Stoke-on-Trent. Therefore, in order to understand the ability of the supply of housing land to meet the full, objective assessment of housing needs across the housing market area, it would be necessary to measure the supply of land in both local authority areas rather than within Newcastle-under-Lyme alone. It is proposed to undertake this work following the next annual update in April 2016 and this will be used to inform the development of the Spatial Options for the Joint Local Plan, which is currently scheduled to be subject to public consultation in June and July 2016.

- 2.4 The full, objective assessment of housing needs for the housing market area is therefore made up from the evidence of individual housing need for the two local authority areas. This mid-year update assesses the Borough's housing land supply situation against its individual evidence of housing needs (see paragraph 2.6 below).
- 2.5 This updated evidence on the Borough wide need for new housing is presented within the Joint Strategic Housing Market Assessment as a range. At the lower end of the range, the housing need figure is based on a projection forwards of past trends in population growth over a ten year period between 2003 and 2013¹, taking in to account birth and death rates as well as migration in to and out of the area. At the upper end of the range the housing need figure is based on Cambridge Econometrics' Local Economy Forecasting Model, which projects forwards past trends and statistics on the local economy (in terms of economic output and employment) to determine how much the Borough's workforce would need to grow and be accommodated within new housing in order to support the projected economic growth.
- 2.6 The lower and upper ends of the housing need range for the Borough are identified within the SHMA are as follows:
 - At the lower end of the range, at least 367 new dwellings per annum are required in order to support likely population-led growth
 - At the upper end of the range, at least 679 new dwellings per annum are required in order to support likely economic-led growth
- 2.7 This housing need range is also presented in section 3 of the accompanying Five Year Housing Land Supply Statement.
- 2.8 Given that the housing land supply information for both local authority areas cannot yet be assessed against the full, objective assessment of housing needs, and that a single housing target for the Borough has not yet been developed through the Joint Local Plan, your officers consider it appropriate to measure the supply of housing land against the range of housing needs identified above.

Step 1: Calculation of the Housing Requirement for the next Five Years

- 2.9 In addition to the above range of housing needs identified for the Borough within the Joint Strategic Housing Market Assessment, it is necessary to identify whether there may be further housing requirements to include due to past under-delivery.

Past Housing Delivery

- 2.10 Where past under-delivery has been persistent, the NPPF requires local planning authorities to also apply an additional 20% buffer to their housing requirement over the

¹ a ten year period is considered more robust than the 7 year period that was considered in the last annual statement

next five years. If there is no record of persistent under-delivery then a 5% buffer can be applied.

- 2.11 The base date for the housing need range identified in the Joint Strategic Housing Market Assessment is 2013. This is because, at the time the Joint Strategic Housing Market Assessment was being produced, 2013 was the most recent mid-year estimate of population for the Borough which had been published by the Office for National Statistics. Therefore, your officers consider it appropriate to measure past delivery of housing against this base date of 2013.
- 2.12 There have been some notable recent appeal and High Court decisions that have considered how past delivery should be measured when there is new evidence available on housing needs. Paragraph 4.7 of the accompanying Statement identifies the High Court ruling '*Zurich Assurance Ltd v Winchester City Council [2014] 578 (Admin) (18 March 2014)*'. This was a case where the party bringing the challenge had argued that the housing shortfall against the previous plan target should also be added onto the future housing need figure. In our case this would mean adding on past shortfall from the Core Spatial Strategy plan target. However the Judge in that case ruled that it would be wrong to mix requirements from different sources of housing need.
- 2.13 In a recent appeal case at Tibberton in Telford & Wrekin (APP/C3240/W/15/3003907), the appellant also argued that backlog against the previous plan target should be added to the assessment of housing need. However the Inspector in that case also ruled against adding previous plan requirements to the more up to date housing need evidence.
- 2.14 Furthermore, our Joint Strategic Housing Market Assessment has taken in to account the effect of past under-delivery of housing since 2001, which has seen younger households not being able to access their own housing. The Joint Strategic Housing Market Assessment also identifies that the delivery backlog against the Core Spatial Strategy target reflects more of a market demand challenge than a specific position arising from planning constraints.
- 2.15 Taking all of the above information in to account, your officers believe that it is most appropriate to measure past delivery against the housing need range identified within the Joint Strategic Housing Market Assessment, using the base date of 2013, and not to add additional requirements prior to 2013 resulting from previous shortfalls against the Core Spatial Strategy plan target.
- 2.16 The Table below shows how the borough has been delivering against both the upper and lower ends of the housing need range since 2013. This is also presented as Table 1 in the accompanying statement.

Monitoring period:	Net dwellings completed:	Lower end of range:	Delivery against lower end:	Upper end of range:	Delivery against upper end:
2013-14	295	367	-72	679	-384
2014-15	219	367	-148	679	-460

Monitoring period:	Net dwellings completed:	Lower end of range:	Delivery against lower end:	Upper end of range:	Delivery against upper end:
01/04/15 to 30/09/15 ²	92	184	-92	340	-248
Total:	606	918	-312	1,698	-1,092
Average per year:	243	367	-124	679	-436

2.17 As shown, under-delivery has occurred against both the lower and upper ends of the housing need range since 2013, leading to respective shortfalls of 312 and 1,092 new houses. These shortfalls will be added on to the lower and upper housing need requirements for the next five years.

2.18 In determining whether or not it is appropriate to also apply the NPPF buffer of 20% additional housing to the requirement over the next five years, we also need to understand whether or not there has been *persistent* under-delivery of new housing within the Borough. For the purposes of determining this, looking back to 2013 does not offer a long enough period to identify whether or not past under-delivery has been persistent. However given that the Joint Strategic Housing Market Assessment identified that there had been past under-delivery of new housing since 2001 and that previous Five Year Housing Land Supply Statements had identified that persistent under-delivery had taken place, your officers consider that it is appropriate to also apply a 20% buffer to this calculation of the housing requirement.

2.19 The total requirements for the lower and upper end of the housing need ranges, once past shortfall and the 20% buffer have been applied, are presented in the table below. This is also presented as Table 2 in the accompanying statement.

Calculation Stages:		Lower end of range:	Upper end of range:
A	Annual requirement:	367	679
B	Requirement for next five years (Ax5):	1,835	3,395
C	Existing shortfall:	312	1,092
D	SUB TOTAL (B+C):	2,147	4,487
E	20% buffer (D÷5):	430	898

² As this is a six month period, the annual requirement figures have been halved and rounded to the next whole figure

Calculation Stages:		Lower end of range:	Upper end of range:
F	Total requirement for next five years (D+E):	2,577	5,385
G	Revised annual target (F÷5):	516	1,077

2.20 These additional requirements increase the housing requirement for the next five years to 2,577 new dwellings (516 per annum) at the lower end of the range and 5,385 new dwellings (1,077 per annum) at the upper end of the range.

Step 2: Housing Land Supply

2.21 The Five Year Housing Land Supply Statement identifies that the remaining capacity of all sites with approval (or Planning Committee resolutions for approval) for housing development in the Borough at 1st October 2015 was 1,728 new dwellings. The details of all sites included in the supply are provided in the Appendix to the Statement.

Additional Sites

2.22 Six additional sites that as yet do not have planning approval have also been included in the housing supply contained within the Statement. These are:

- Wilmot Drive, Cross Heath (100 dwellings, SHLAA³ site 337)
- Ashfields New Road, Cross Heath (42 dwellings, SHLAA site 9775)
- The Hawthorns, Keele (75 dwellings, SHLAA site 40)
- Walton Grove/Coppice View, Talke Pits (10 dwellings, SHLAA site 11)
- Land rear of 166-168 Bradwell Lane, Bradwell (5 dwellings, SHLAA site 53)
- Hillport Avenue, Bradwell (6 dwellings, SHLAA site 131)

2.23 These sites have been included taking into account the relevant sections of the NPPF and PPG. These do allow for sites without planning approval to be included as deliverable, provided that up to date and sound evidence to support the likelihood of their delivery in the next five years is clearly and transparently set out, taking into account a consideration of associated risks and an assessment of the local delivery record. Such sites must not have significant constraints to overcome, for example new infrastructure provision.

2.24 All of the above sites, apart from The Hawthorns, have been included because the Borough Council has a sufficient record of assurances (such as email correspondence or meeting notes) from the landowners or their agents that the number of dwellings listed for each of these sites can be delivered in the next five years. All of these sites have also been identified as deliverable in the SHLAA.

2.25 The Keele Hawthorn site, as Members will be aware, was subject to a planning appeal against the Council's refusal of planning permission. As far as the Council was concerned the principle of residential redevelopment of the site was acceptable, but the scheme involved overdevelopment and harm to the character of the Conservation

³ Strategic Housing Land Availability Assessment

Area and the locality. The Planning Inspector agreed that the proposal would have an adverse impact on the established trees within the site and the setting of a historic building (Hawthorns House). A new planning application (15/01004/FUL) has been submitted for the development of this site, however given that this has been received after the 1st October date against which this calculation is made and that it is currently under consideration, this new planning application cannot be factored in to this mid-year update. Taking in to account the Planning Inspector's reasons for refusal which would reduce the capacity of the scheme that was subject to appeal, your officers now consider that an appropriate capacity for the site would be 75 dwellings. This takes account of the number of dwellings from the previous proposal that contributed to its reasons for refusal.

Windfall Allowance

- 2.26 The NPPF also states that an allowance for windfall sites can be included in the five year supply calculation if there is compelling evidence that they have consistently become available in the area and will continue to provide a reliable source of supply. Windfall sites are defined as those that have not specifically been identified as available in the Local Plan process and are normally previously developed sites that have unexpectedly become available.
- 2.27 For the purposes of the Five Year Housing Land Supply Statement, windfall sites are considered to include the change of use and conversion of existing buildings for residential use and sites not previously identified within the SHLAA. Table 3 of the Statement shows that an average of 40 new dwellings per year has previously been delivered on such sites between 2013 and 2015.
- 2.28 40 dwellings per year is therefore the windfall assumption used in the five year supply calculation. As most planning approvals remain extant for up to 3 years, this windfall assumption is applied to the latter two years of the five year period (i.e. 2018-2020) in order to avoid duplication with any existing approvals. This provides an additional anticipated supply of 80 new dwellings within the next five years.

Total Capacity of Housing Land Supply for the Next Five Years

- 2.29 Taking in to account all of the above sources, **the total capacity of land for housing development over the next five years is 2,046 new dwellings**. This is 85 dwellings higher than the total capacity identified in the April 2015 Statement. The calculation of the total site supply is summarised in Table 4 of the statement, which is also reproduced below.

Source of Supply:	Dwellings:
Remaining capacity of sites with planning approval at 1 st October 2015:	1,728
Capacity of sites with no planning approval but anticipated to deliver new housing prior to 2020:	238
Windfall allowance:	80
Total:	2,046

Step 3: Calculation of the 5 year Housing Land Supply Figure

- 2.30 Step 1 identifies that the total housing requirements for the next five years, as derived from the housing need range for the Borough that is evidenced in the Joint Strategic Housing Market Assessment, suggest that at least 2,577 new dwellings (516 per annum) would be required at the lower end of the range, and at least 5,385 new dwellings (1,077 per annum) would be required at the upper end of the range.
- 2.31 The total supply of land for housing development at 1st October 2015 identified under Step 2 is 2,046 new dwellings. Taking together the total supply of land for new housing development with the total requirements for new housing over the next five years suggests that there is an indicative land supply in the borough of **3.97 years** at the lower end of the range and **1.90 years** at the upper end.
- 2.32 At this point it worth reiterating that this range is derived from Joint Strategic Housing Market Assessment's evidence on the Borough's housing need and not the full, objectively assessed housing needs which needs to be considered across the housing market area, which would also encompass Stoke-on-Trent. As such, the calculation can only be considered as an indicative figure at this stage, however it does carry more weight in decision making than the previous Statement, as that was based on the sub-national household projections which hadn't been tested against the local circumstances of the housing market and the economy. Further explanation about the weight of this calculation in decision making is given in Section 3 of this Committee Report.
- 2.33 Full details of how the five year supply figure has been calculated are included in the Five Year Housing Land Supply Statement which is attached as an Appendix to this Committee Report. Following Planning Committee's consideration of the Statement, it will be published on the Planning Policy pages of the Council's website and be the basis for the Council's position on housing land supply in the borough.

Next Steps

- 2.34 An assessment of whether or not the supply of land for housing development in both Newcastle-under-Lyme and Stoke-on-Trent is sufficient to meet the full, objective assessment of housing needs across the housing market area will be made at the Strategic Options stage of the Joint Local Plan preparation process. This is when opportunities to accommodate and locate development in the future will be explored.
- 2.35 The diagram below provides further explanation about the process that must be followed under national planning policy to progress from basic household growth projections through to a new housing target set within an up to date and adopted Local Plan. The weight in decision making of the five year housing land supply figure gradually increases at each stage of this process.

Stage:		Explanation:
1	Pre-NPPF plan target	This is a housing target from a Local Plan that pre-dates the National Planning Policy Framework. For Newcastle-under-Lyme, this means the current Core Spatial Strategy plan target which was derived from the 2007 revision to the West Midlands Regional Spatial Strategy. The national Planning Practice Guidance states that "evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs". This stage has very limited weight in decision making
2	Household projections	These are the 'Sub-National Household Projections' that are usually published every two years by the Department for Communities and

Stage:		Explanation:
		Local Government. They are called 'Sub-National' projections because they break down the national projections of household growth to a local authority level. As such they have not been tested against the local housing market or the local economy. The most recently published projections are '2012-based' and it is these that were used to inform the last calculation of the five year housing land supply in the Borough as at April 2015.
3	Up to date evidence of housing needs – derived from the SHMA	The Joint Strategic Housing Market Assessment has undertaken further modelling and testing of local circumstances to develop a range of projections of housing need, which goes beyond that identified by the Sub-National Household Projections. This has been undertaken at the local authority level but the methodology has been applied consistently across Newcastle-under-Lyme and Stoke-on-Trent. It is this up to date evidence on the Borough's housing needs which forms the basis of this mid-year update to the five year housing land supply calculation.
4	Full, objective assessment of housing needs – derived from the SHMA	Only once the range of housing needs for Newcastle-under-Lyme and Stoke-on-Trent identified under stage 4 have been added together do we have the full, objective assessment of housing needs for the whole housing market area. The Joint Local Plan Issues Paper Consultation Document presents and explains the full, objective assessment of housing needs. However it will be at the Strategic Options consultation stage, following the production of the councils' Strategic Housing Land Availability Assessments, when the potential capacity of the housing land supply to accommodate future development will be explored across both local authority areas.
5	Consider the implications of planning policy and constraints to development	At the Strategic Options stage there will also be an exploration of the implications of wider policy aspirations for growth (for example those identified in the LEP's Strategic Economic Plan) and also whether there is limited capacity to accommodate the full, objective assessment of housing needs. If so, then following Strategic Options other opportunities will need to be explored such as making modifications to existing planning designations (such as Green Belt) and liaising with neighbouring authorities.
6	Narrow down the range to a single target	This stage is the culmination of all of the above evidence gathering and assessment stages. This is where all of the factors relating to housing need and the capacity of the land supply will be considered in balance to determine what the most appropriate and sustainable level of housing growth will be for the Joint Local Plan to deliver. The single target for the housing market area and for each authority will be presented within the draft Joint Local Plan.
7	Subject the Joint Local Plan and it's housing target to independent Examination	After the draft plan consultation stage, both authorities will make any final amendments and then publish a final Joint Local Plan which will be submitted to the Planning Inspectorate to be considered at an independent Examination. At this stage it will be necessary to allocate sufficient land to provide a five year housing land supply. Without this the plan will be found unsound.
8	Adopt the Joint Local Plan and the new housing target	Once the Joint Local Plan is found 'sound' at Examination then both authorities can proceed to adopt it. It is at this point that housing target for the Borough contained within the plan will carry considerable weight in decision making.

3.0 DEVELOPMENT MANAGEMENT IMPLICATIONS

- 3.1 According to the Mid-year update Statement, there is an indicative land supply in the Borough of **3.97 years** at the lower end of the housing need range and **1.90 years** at the upper end of that range. As pointed out in the introduction, this is not a substitute for a robust and defensible housing requirement set within an up to date and NPPF compliant Local Plan, nor is it based upon a full objective assessment of housing needs as no such assessment is currently available.
- 3.2 Paragraph 49 of the NPPF states that housing applications should be “considered in the context of the presumption in favour of sustainable development” and that “relevant policies for the supply of housing should not be considered to be up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites”.
- 3.3 The NPPF describes housing supply policies as either up to date or not by reason of whether or not a planning authority can demonstrate a five year supply of housing sites. There is no middle ground anticipated in national policy. A Local Planning Authority either can or cannot demonstrate such a supply. The directive in paragraph 49 of the NPPF must be considered to be engaged – the Council’s housing supply policies cannot be considered to be up-to-date.
- 3.4 If housing supply policies (which include most particularly saved Local Plan Policy H1 and its reference to village envelopes, and CSS policy ASP6 with its reference to Rural Service Centres and a maximum amount of dwellings within the Rural Area) are not up-to- date then, according to the NPPF in paragraph 14, insofar as development management or decision-taking is concerned, this means, because housing supply policies are not up-to-date, unless material considerations indicate otherwise, granting planning permission unless;
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
 - specific policies in the Framework indicate development should be restricted.

This is described as the presumption in favour of sustainable development.

- 3.6 At the time of the previous statement, when a 5.07 year supply figure was indicated, whilst your officers advised that the calculation, being based upon household projections, was most unlikely to be considered to be a **demonstration** of a 5 year supply, it was considered by your officers that in undertaking the weighing up exercise referred to above, it would not be unreasonable to take into account the then apparently improved housing supply position in assessing what weight to give to the contribution which a proposal might make to that supply. It was suggested that this might mean for example that adverse landscape impact might have perhaps more easily “significantly and demonstrably outweighed” the benefits particularly if such benefits were solely ones relating to the supply of housing. In the light of new housing need evidence such a position is no longer tenable. An even greater weight will at least for the immediate future have to be given to the contribution a site makes to housing land supply.
- 3.5 The Framework in giving examples of the specific policies in the Framework (the second bullet point) refers to policies relating to land designated as Green Belt, designated heritage assets and locations at risk of flooding. This it should be noted is a list of examples rather than an exhaustive list.

- 3.6 The NPPG, published in March 2014, notes that unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. Member may remember that such advice was given at the time of the consideration of the Pepper Street proposals (13/00970/OUT)
- 3.7 Over the years there have been a series of responses by the Council as the local planning authority to this situation, in development management terms. With the focus always being on achieving sustainable development, there has been an acceptance for some time that an objection of conflict with policies on housing land supply within the development plan cannot be raised to the development of greenfield sites within the urban area. There are numerous examples of this with probably the most significant one being the site known as Apedale South, the residential development of which obtained planning permission from the Council in December 2014, with the signing of the associated Section 106 agreement.
- 3.8 A similar approach has been taken to greenfield sites in the Rural Service Centres (Madeley, Loggerheads and Audley Parish). Each of these locations has a village envelope or, in the case of Audley Parish, a series of village envelopes, the boundaries of which are set out in the Local Plan and on the Local Development Framework Proposals Map.
- 3.9 The same position has been adopted with respect to proposals within those village envelopes that are not within the Rural Service Centres and are not “washed over” by the Green Belt. This means Betley, Mow Cop, Madeley Heath, Baldwins Gate, Ashley and Whitmore. Even though Core Spatial Strategy Policy ASP6 seeks to direct residential development, within the rural areas, to the Rural Service Centres, this policy cannot be considered to be “up to date” and provided the development in question is a sustainable one such locations can be an acceptable location for development.
- 3.10 Over the last year and a half there have been a series of applications relating to significant residential proposals on sites which whilst not within a village envelope are immediately adjacent to it but are not within the Green Belt. Examples include the Gateway Avenue, Baldwins Gate proposals (13/00426/OUT), the land to the rear of Rowley House, Moss Lane, Madeley (13/00990/OUT), the land off Mill Lane, Madeley and the land of New Road, Madeley (14/00930/OUT). All of these proposals were approved, either on appeal (as in the case of Gateway Avenue), or by the Borough Council itself. Other proposals, for development that is further away from such villages have been generally refused and upon occasion this position has been supported on appeal – the developments at Farcroft, Manor Lane (14/00037/OUT) and at the site adjacent to Slaters, Stone Road, Hill Chorlton (14/00875/OUT) being good examples.
- 3.11 The approach taken by your officers on such applications has reflected the position set out in paragraph 14 of the NPPF and will continue to do so given that it is considered that the Council cannot demonstrate a 5 year supply of deliverable housing sites. Further applications for residential development have been received that are neither within the urban area nor within the Rural Service Centres nor the village envelopes indicated above. Each will need to be considered on its own merits bearing in mind in particular the guidance set out within paragraph 14 of the National Planning Policy Framework, as set out in paragraph 3.4 above.
- 3.12 Similarly applications may be received on employment sites whose development for residential purposes may be considered to be contrary to Local Plan Policy E11 on

proposals that would lead to the loss of good quality business and general industrial land. Again the same approach will need to be taken, as it was in reports on applications such as those for Linley Trading Estate (13/00625/OUT) approved in January 2014 (subject to the prior completion of a legal agreement) and Land off Watermills Road (13/ 00974/OUT) refused in April 2014 and then allowed on appeal in February 2015. The weight to be given to the benefit of additional supply of housing as opposed to the adverse impact of the loss of employment land, will take into account the information in the new Supply Statement.