

## **Council Response to Milwood P2-N38 (Milwood response to P2-N5 and P2-N2)**

The purpose of this note is to respond to Milwood's submission (P2-N38) regarding Stafford Borough's Five Year Housing Land Supply Statement 2016 (P2-L1) and its detailed calculations. The Council's submission P2-N5 has previously responded to Advisory Notes 1 & 2 (P2-N2) from Milwood in order to explain the methodology and calculations in the Five Year Housing Land Supply Statement 2016. This latest submission from Milwood (P2-N38) appears to repeat similar matters.

The Borough's Five Year Housing Land Supply Statement (P2-L1) is based on Spatial Principle 2 in the adopted Plan for Stafford Borough (P2-C1), setting out a requirement of 500 dwellings per year over the Plan period 2011 - 2031.

To work out the Borough's Five Year Housing Land Supply (as shown on page 6 of the Five Year Housing Land Supply Statement (P2-L1)), the Council calculates an annualised housing requirement, which is made up from the adopted Plan's requirement of 500 homes per year, plus a 20% buffer to take account of past under-delivery and any accumulated shortfall (which is accumulated from all previous years including the most recent year). Through the Liverpool approach the shortfall is split over the plan period whilst with the Sedgfield approach the shortfall is split over the 5 year period. To calculate the number of years' worth of housing land supply, the total number of deliverable homes over the five year period is divided by the annualised housing requirement (which includes the 20% buffer and accumulated shortfall) to provide the number of year's deliverable housing land. The latest calculations are detailed on pages 2, 3 & 6 of the Borough's Five Year Housing Land Supply Statement (P2-L1)

The Milwood calculations, detailed in submission document P2-N38, incorrectly applies the annualised housing requirement as the target for completions in the following year, instead of the adopted Plan's requirement of 500 dwellings per year. Furthermore by using the annualised housing requirement (which already includes the 20% buffer and shortfall) as the following year's target, and then also applying the 20% buffer and shortfall to the calculation, this double counts the shortfall and the 20% buffer when establishing the total supply of year's deliverable housing land supply figure. This approach is critically flawed.

The Council's latest 5 Year Housing Land Supply Statement 31st March 2016 uses the correct approach to establish the number of year's deliverable housing land and is sound.