



Lichfield
District Council

PROOF OF EVIDENCE
(LDC/2)

By

Gemma Hill

Senior Policy and Strategy Officer on Behalf of Lichfield District Council

APPEAL BY:

Marrons Planning on behalf of Summix BLT Developments Ltd.

AT:

Land North Of Browns Lane

Tamworth

Staffordshire

PLANNING INSPECTORATE REFERENCE: APP/K3415/W/24/3340089

LPA PLANNING APPEAL REFERENCE: 24/00004/REF

LPA ORIGINAL PLANNING APPLICATION REFERENCE: 18/00840/OUTMEI

Contents

1. Introduction
2. Personal Background
3. Background and Planning Policy Context
4. The Council's Case
5. Conclusion

Appendices

Appendix 1 - Lichfield and Tamworth Affordable Housing Completions

Appendix 2 - Lichfield and Tamworth Housing Register Rented Demand Data

Appendix 3 - Lichfield Shared Ownership Demand Data

Appendix 4 – Waiting Times for a Rented Home

1. Section 1: Introduction

- 1.1 This proof of evidence is prepared for Lichfield District Council (LDC) in respect of an appeal against the refusal of the Outline Planning Application for the erection of up to 210 no. dwellings, public open space, landscaping, sustainable urban drainage, access, and associated infrastructure with all matters reserved save for access, at Land North of Browns Lane, Tamworth, Staffordshire.
- 1.2 This proof of evidence sets out the housing need in the area and the delivery of affordable housing will be discussed. The weight to be given to the provision of affordable housing at Browns Lane and the enhanced offer will be addressed in the proof of Patrick Daly.

2. Section 2: Personal Background

- 2.1 My name is Gemma Hill. I have held the position of Senior Policy and Strategy Officer for the last year and have worked as a Strategy Officer for Lichfield District Council for nearly 3 years within the Policy and Strategy Team.
- 2.2 Prior to working for the council, I worked for 12 years in housing for a registered provider.
- 2.3 The evidence which I have provided for this appeal is true and the opinions I express are my true and professional opinions.

3. Section 3: Background and Planning Policy Context

- 3.1 The background of the case and the planning policy context are set out in the Statement of Common Ground.
- 3.2 The SoCG sets out a number of agreed matters in relation to the need and supply of affordable housing. This proof will address two things:
- i) It will contextualise the parties agreement (SoCG 9.9) that there is an ongoing need for affordable housing across Lichfield and Tamworth.
 - ii) It will examine the approach the Councils will take to address any backlog of affordable housing (a point of disagreement at 10.3 of SoCG).

4. Section 4: The Council's Case

The ongoing need for Affordable Housing across Lichfield and Tamworth

- 4.1 It is agreed in the SoCG that the HEDNA states there is a net need for 220 affordable homes to rent per annum in Lichfield between 2016 and 2036. It is also agreed in the SoCG that the SHMA Update 2012 identifies a need for 377 new affordable homes per annum. However, it is important to not just look at overall figures given. The need shouldn't be treated as uniform need for all areas across the district, we can see that in Table 8.1 of the Local Plan below there is a target delivery broken down into areas. The target number of units are apportioned to where the developments should be delivered.

Table 8.1 Housing Distribution & Delivery (excluding windfall allowance)

Settlement	Sub Housing Market Area	Completions 2008 2013	Deliverable Urban Sites (2013-2018)	Developable Urban Sites (2018-2029)	Strategic Development Allocations/Broad Locations	Totals	Overall %
Lichfield City	City of Lichfield	372 (32%)	710 (44%)	730 (51%)	2,100 (35%)	3,912	38%
Burntwood	Burntwood	153	422	400	375	1,350	13%

Settlement	Sub Housing Market Area	Completions 2008 2013	Deliverable Urban Sites (2013-2018)	Developable Urban Sites (2018-2029)	Strategic Development Allocations/Broad Locations	Totals	Overall %
		(13%)	(26%)	(28%)	(6%)		
East of Rugeley	Lichfield District North	271 (23%)	0 (0%)	0 (0%)	859 (14%)	1,130 (xxv)	11%
North of Tamworth	Lichfield District South & East	0 (0%)	0 (0%)	0 (0%)	1,000 (17%)	1,000 (xxvi)	10%
Fradley	Lichfield District North	377 (32%)	485 (30%)	300 (21%)	1,250 (21%)	- 1,259	12%
Armitage & Handsacre					Approx. 440 (7%) (to be considered through Local Plan: Allocations & Community Led Plans)	1,153 - 1,593	16%
Alrewas							
Fazeley							
Shenstone							
Whittington							
Other Rural	Lichfield District North, South & East				Additional to be considered through Community Led Plans		
Approx. Total:		1,173	1,617	1,430	5,584 6,024	9,804 10,244	100%

- 4.2 This site falls within 'Other Rural' and adjoins (but is not within) North of Tamworth as defined on the Local Plan Policies Maps. Other Rural along with five other areas will take 16% of housing delivery, the 10% in North of Tamworth has already been met.
- 4.3 Consideration must be given to existing supply within the locality of the proposed site. LDC has allocated sites to assist in meeting the needs of Tamworth. The strategic site at Arkall Farm a boundary site near to Browns Lane is consented to permit 1000 dwellings which is noted in Local Plan Strategy Chapter 15: North of Tamworth. 500 dwellings are to support Tamworth's housing need and 400 homes overall will be affordable homes with a 60% nomination right to Tamworth. To date this site has 2 phases approved and delivered, with a total of 315 homes completed of which 117 are affordable. The mix here includes 1,2 and 3 bed homes.
- 4.4 This site is adequate in providing affordable homes in this area. There is also the Browns Lane strategic site which is built and complete consisting of 165 dwellings in total. The site completed in approximately 2020 and provided 41 affordable homes. The mix of AH included 1,2,3 and 4 bedroom homes. Therefore, there is sufficient delivery of affordable homes in this area to meet the 10% provision of the target homes requirement set out for the North of Tamworth in the Local Plan Strategy Chapter 8: Homes for the Future.
- 4.5 The increase in housing stock in this area has increased housing options for those wanting to live there and ultimately will have increased choice and assisted homeless families. It is highly likely that any further development outside of the planned sites in this location could create a surplus of housing stock that are not needed or wanted.
- 4.6 Moving on, to the housing register figures outlined in Appendix 2, there are 524 applicants on the register for LDC and 451 on the register for Tamworth Borough Council (TBC) at present.
- 4.7 These are the total number on each of the housing register for the whole of the authority area. It is acknowledged that these applicants can bid on any property that is advertised and, in any area, however, I am arguing that the overall figure on the housing register particularly the LDC register, does not accurately reflect the need in the development area of Wigginton.
- 4.8 Wigginton falls within the Whittington and Streethay Ward and when interrogating the housing register data, it shows that there are only 20 applicants who are choosing this ward as their first area of preference. 21 applicants are choosing it as their second area of preference, this demonstrates that there would be a risk of a significant shortfall in housing demand if this development was to proceed.
- 4.9 To ensure a robust approach to the assessment of housing demand, applicants on the register for the SHMA sub areas were considered. The demand figures shown in Appendix 2 demonstrates there are a total of 48 applicants on the register advising that these areas are their first choice.
- 4.10 If you were to combine the immediate ward and adjacent wards housing need statistics for the first area of preference, there would still be an insufficient number of residents to fill the proposed number of dwellings onsite. An insufficient number of applicants for housing causes a risk of new homes stood built and complete with no one to live in them. In these

cases, the council is open to criticism that housing should have been built in areas more in need in the Local Plan i.e., in Lichfield City and Burntwood.

- 4.11 In addition to looking at the housing needs of the adjacent wards, it must be highlighted that the variance in distance between the ward that Wigginton is in and for example the adjacent ward area of Bourne Vale is 13 miles. It is unlikely that someone would choose to move that far away from their desired area. Taking this into account, the housing need data for adjacent wards should not be relied upon for housing need and demand for the proposed development. I have raised it simply to illustrate the lack of demand in the wider area of Lichfield for affordable housing.
- 4.12 Whilst we can see that there are 451 applicants on the housing register for Tamworth, it is not possible to report on a ward breakdown and it can't be assumed that all applicants on the register will want to live in Wigginton. It is also likely that a proportion of the applicants on the register for Tamworth are also on the register in Lichfield and there maybe some overlap in applications.
- 4.13 The data within Appendix 4 shows that for affordable homes to rent within Lichfield District there is a lower waiting time compared to neighbouring authorities Tamworth and East Staffordshire Borough Council. This demonstrates that the existing turnover of stock is also addressing the needs of people on the register.
- 4.14 Data for shared ownership demand in the area is limited. Appendix 3 shows data from 2022 from the Help to Buy website. There were 110 people with a local connection to Lichfield advising that they were interested in shared ownership. Of the 110, just 13 advised a local connection to Tamworth. This data should not be relied upon for demonstrating the need of the area of Wigginton. It is achievable to meet the need demonstrated in these figures with current completions of affordable housing in this area.
- 4.15 To conclude, while it is agreed there is need for affordable housing across Lichfield and Tamworth, the need should be met across the two authorities' areas. There is no evidence to demonstrate that the additional affordable homes in this location are needed because there is an insufficient number on the register interested in this area and there is a sufficient new supply from existing ongoing development. Whilst it is noted that LDC current supply may not be achieving targets set out, there are other areas of the district where development would be more suitable and would not carry a high risk of oversupply and be a better approach to achieving the need targets. If the proposed site were to go ahead, there will be a risk of surplus stock creating a negative impact on the housing economy and potential negative impact on the local community.

Approach the Councils will take to address any backlog of affordable housing

- 4.16 Firstly, looking at supply and delivery, LDC have a land supply of at least 9.4 years and at present TBC has a land supply of 10.5 years, which demonstrates that both authorities have a healthy supply. This demonstrates that both authorities are unlikely to find delivery of pipeline schemes difficult over the coming years. The 5 YHLS 2023 also advises that 848 AH are committed and we are going to deliver and average of 170 units per annum, not including any windfall developments.
- 4.17 As outlined in the AH SoCG the indicative target for the delivery of affordable homes for LDC and TBC are set out in the Local Plan Strategy, supported by the HEDNA 2020 Update

and the SHMA 2012. The figures regarding under delivery are not disputed however, when considering the Local Plan refers to LDC working with Registered Providers to maximise opportunities, it is important that the development occurs where it is most needed.

- 4.18 LDC will deliver affordable housing through planned housing developments with several strategic sites coming through in the next 5 years as well as any additional sites coming forward outside of these allocations.
- 4.19 Tamworth's supply in Appendix 1 shows that cumulative delivery vs target has an upward trend since 2015. This demonstrates that TBC apart from the year 2015, have consistently exceeded the 40 homes per annum target as set out in the Local Plan Policy HG4. The development at Arkall Farm will continue to contribute to this and I contest that any further units would be needed in this locality.
- 4.20 LDC Housing Team hold completions data directly from the registered providers which will vary slightly to the completions set out in the SoCG. I have included the figures in Appendix 1, they demonstrate an increased provision per year of affordable homes. The difference is that the registered providers are reporting on homes that people in need can physically move into. I have included these figures to demonstrate that the last couple of years have seen consistently high delivery.
- 4.21 To conclude we have a good track record in delivery of affordable housing, as shown in the figures in Appendix 1 our delivery has shown an increase over the years. We have an effective strategy for increasing delivery of affordable homes with a strong supply.

5. Section 5: Conclusion

- 5.1 To conclude, while it is agreed there is need for affordable housing across Lichfield and Tamworth there is no evidence to demonstrate that the additional affordable homes in this location are needed. Whilst it is noted that LDC current supply may not be achieving targets set out, there are other areas of the district where development would be more suitable and would not carry a high risk of oversupply and be a better approach to achieving the need targets. If the proposed site were to go ahead, there will be a risk of surplus stock creating a negative impact on the housing economy and potential negative impact on the local community.
- 5.2 Furthermore, the Council have an appropriate strategy for addressing the ongoing need without requiring the appeal proposal providing affordable housing in an area of the two authority areas which has seen significant delivery of affordable housing in recent times.

Appendix 1 – Affordable Housing Completions

Lichfield Affordable Housing Completions:

Tenure	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Shortfall on HEDNA requirement since 2020
S/O	18	3	3	34	81	84	36	164	107	83	852 - 390 = 462 units
Rented	13	47	3	99	154	122	77	188	166	107	880-538 = 342 units
Discount Market Sale	0	0	22	2	0	0	0	0	0	0	N/A for period 2020 onwards
Total	31	50	28	135	235	206	113	352	273	190	804 units shortfall

Source: Lichfield Housing Strategy Team: Completions reported from registered providers

Spatial Policy Recorded Completions

2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
8	19	22	14	40	16	26	44	33	97	169	143	90	291	263	

Source: Lichfield District Council: Completions taken from building control

Tamworth Affordable Housing Completions:



Source: Tamworth Borough Council Housing Team

Table of Affordable Housing Completions for Tamworth:

2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total
18	46	122	63	158	165	90	41	68	1095

Source: Tamworth Borough Council Housing Team

Appendix 2 – Housing Register Figures

Lichfield Housing Register Data

Area of preference	Number of applicants for first area of preference	2nd area of preference
Whittington and Streethay	20	21
Bournevale	2	6
Fazeley	28	4
Little Aston and Stonnall	5	4
Shenstone	10	12
Mease Valley	3	2
Total	68	49

Overall housing register figures	
Bed need	Number of applicants
1	215
2	107
3	134
4	60
5	7
6	1
Total on register	524

Source: Lichfield District Homes 2024

Tamworth Housing Register Data:

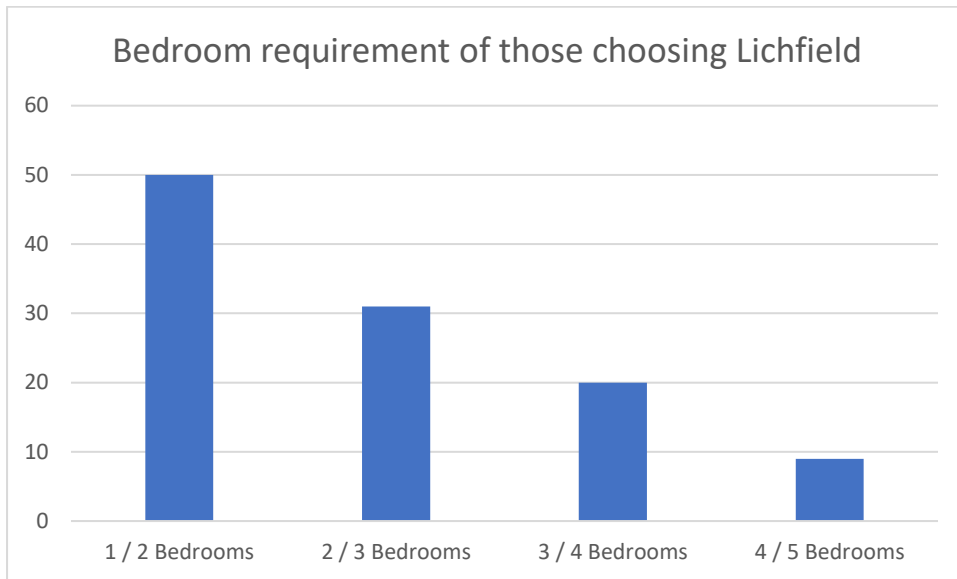
Band's on housing register	Number of applications
Band 1	69
Band 2	213
Band 3	121
Band 4	48
Total on the housing register	451

Applications by bedroom need	
1 bed need	165
2 bed need	129
3 bed need	102
4 bed need	44
5 bed need	10
6 bed need	1
Total	451

Source: Tamworth Borough Council Housing Options Team 2024

Appendix 3

**Shared Ownership Data: Applicants Wishing to Live in Lichfield and Stating a Local Connection
2022**



Source: Help To Buy website 2023

Appendix 4 – Waiting times for a rented property

Lichfield waiting time 2023 Source: Lichfield District Homes

Average Wait Time By Applicants Bedroom Need				
Bedroom Need	Total Number Of Lets	Total Days On Reg	Avg Wait time in days	Percentage Of Allocations
1 Bed	170	5904	34.72941176	37.94%
2 Bed	174	15750	90.51724138	38.83%
3 Bed	94	23336	248.2553191	10.93%
4 Bed	10	4155	415.5	2.23%
5 Bed	0	0	0	0%
Total	448	49145	109.6986607	100%

Tamworth waiting time 2023 Source: Tamworth Borough Council Housing Options Team

Bedsize	General Needs	High Rise	Sheltered
	2023	2023	2023
1 bed	139	96	127
2 bed	161	82	260
3 bed	247	NA	NA
4+ bed	572	NA	NA

East Staffs waiting time 2021 Source: East Staffordshire Borough Council

Average Time on Register	Bedroom Entitlement	Average Time on Waiting (days)	Average Time on Waiting (Weeks)
Last 12 Months	1	303	43
	2	384	56
	3	567	81
	4+	729	104
	Average for All	394	56

³ Date of information 12 October 2021, there were 815 allocations of social housing over the 12 month period.