



Murphy Group (RO: 1953)

SHLPEIP MATTER 5

Housing Land Supply





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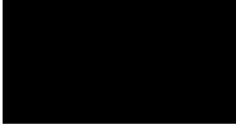

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INTRODUCTION



1 INTRODUCTION

- 1.1.1. WSP¹ has prepared this Hearing Statement on behalf of Respondent ID RO 1953: Murphy Group². An introduction to Murphy Group and a plan showing its land holdings in St Helens and adjacent to St Helens were appended to Hearing Statements Matters 1-3.
- 1.1.2. The Regulation 19 representations are contained from page 222 onwards in SD00821. The representations sought to re-designate 1HS (owned by Murphy Group) as an additional housing allocation.
- 1.1.3. The Statement relates to Matter 5; the answers below conclude that:
- Small site windfalls should not be included in the supply for years 1-5;
 - Demolitions should be included in the supply;
 - There are many new homes included in the supply that are not deliverable or developable and should be excluded;
 - Based on our analysis of land supply, the plan will have **1.82 years** of supply upon adoption;
 - Based on our analysis of land supply, the plan will have a supply of **around 10 years**;
 - Based on our analysis of land supply, the plan shows **a deficit of 2,194 homes** across the plan period.

¹ Indigo Planning made representations at the Regulation 19 consultation on behalf of Murphy Group. Indigo Planning has since been acquired by and become part of WSP.

² Murphy Group is also known as J Murphy & Sons.



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QUESTIONS



2 QUESTIONS

2.1 ISSUE 1: COMPONENTS OF HOUSING SUPPLY

1. Having regard to the Council's responses referred to above, will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2021)?

2.1.1. Yes, albeit the stated position is not accurate, for reasons set out below.

2. Having regard to Council's responses referred to above, will the components of the housing supply that will meet the housing requirement be clearly shown in the Plan?

2.1.2. Appendix 2 of SD025 is not a true position.

2.1.3. A 10% buffer should be applied in accordance with paragraph 73b of NPPF.

2.1.4. The shortfall needs to be recognised and dealt with, namely the 1,241 homes from 2011/12 to 2015/16 that were not supplied (see **M1.11** Table 2.2). Under Sedgefield, these need to be dealt with in the first five years post-adoption.

2.1.5. For the period 2016/17 to 2036/37 a stepped approach resulting from the shortfall and Sedgefield would equate to an increased total requirement of 11,447 (ie 10,206 + 1,241) dwellings, with a stepped delivery rate calculated as follows:

- 2016/17 to 2020/21– the requirement would remain at a delivery rate of 486 dpa (or 2,430 dwellings over five years);
- 2021/22 to 2025/26 – the requirement would be increased to 3,671 dwellings, at a revised delivery rate of 734 dwellings (equivalent to an additional 248 dwellings each year over five years);
- 2026/27 to 2036/37 – the requirement would remain at a delivery rate of 486 dpa (or 5,346 dwellings over 11 years).

2.1.6. Under the Liverpool method, this would equate to an increased total requirement of 11,447 dwellings, at a revised delivery rate of 545 dpa (equivalent to an additional 59 dpa over 21 years).

2.1.7. **Without the correct buffer, the plan is not sound because it is not consistent with national policy in terms of addressing the shortfall or providing the right buffer. Nor will it be positively-prepared without properly addressing the real shortfall.**

3. Is the small sites allowance of 93 dpa justified by compelling evidence (see paras 4.10 to 4.13 of SD025)?

2.1.8. No. Small sites are classed as those falling below the SHLAA's site size threshold of 0.25 ha.

2.1.9. The Council's evidence is set out in HOU002 (paragraphs 3.51 to 3.56, and Figure 3.12) and SD025 (paragraphs 4.10 to 4.13, and Table 4.4). The figure of 93 dpa was identified by analysing historic delivery over a 10-year period (2007/08 to 2016/17). An update to this was undertaken by the Council in SD025, looking at delivery over a more recent 10-year period (2010/11 to 2019/20), which suggested that the average had increased to 103 dpa. Notwithstanding this, as a proportion of the plan period supply (8,274 dwellings), the proposed small sites allowance of 93 dpa equates to 18%. Compared to the residual plan period housing requirement (7,132 dwellings), the proportion equates to 21%. Whilst windfalls can and do play a part in meeting housing requirements, such a heavy

reliance on windfalls increases the risk of the plan's failure as it undermines its robustness, especially when this expected supply is in addition to sites in the SHLAA (in other words, the Council has genuinely no idea what sites these 93 homes per annum will be located on).

- 2.1.10. Just because there was an average of 93 completions on small windfall sites in 10 of the last 14 years does not necessarily mean that historic rates will translate into future trends at the same rate (NPPF paragraph 70). The ability of small windfalls to sustain these levels of delivery will diminish over time.
- 2.1.11. The windfall allowance is not likely to be achievable given: a) the tight Green Belt boundaries and b) the inevitable diminishing supply of land contributing to such a supply. In addition, windfall sites may not necessarily be in the most sustainable locations or have good access to local services and facilities. Their development can sometimes be at odds with other policies, be at the expense of competing land uses, lead to the loss of valued assets or may not be aligned with the community's aspirations.
- 2.1.12. Therefore, small site windfalls should definitely not contribute to supply in the first three years post-adoption, and in our view should not constitute part of the supply for the first five years.
- 2.1.13. Paragraph 15 of the NPPF confirms that the planning system should be genuinely 'plan-led' and provide a positive vision for the future of an area, while paragraphs 11, 23 and 67 require authorities to allocate sufficient sites to bring land forward at a sufficient rate to address needs and to deliver the strategic priorities of the area. The small sites allowance should be removed from the first five years of the plan (this would reduce the supply by 465 dwellings).
- 2.1.14. A greater number of sites should consequently be allocated to ensure there is a truly positively-prepared plan-led approach to development, otherwise the plan is not sound.**

4. Should the supply shown within the Plan make an allowance for demolitions or are they accounted for within the net number of homes anticipated to be delivered from each site?

- 2.1.15. There is a history of demolitions in St Helens – the average is 51 dpa (albeit the figures for 2020/21 have not been published by the Council).
- 2.1.16. The adopted Core Strategy applied a demolitions allowance of 26 dpa. Paragraph 5.20 of the Core Strategy Background Paper (May 2011) – see **Appendix A** to this Statement - stated "*as the housing target is a net requirement (i.e. inclusive of demolitions), the monitoring of demolitions provides an effective method of monitoring net completions*".
- 2.1.17. Paragraph 4.2 of the 2013 Housing Land Position Statement (HLPS) (April 2003 - March 2013) (**Appendix B** to this Statement) explained that "*as the housing target is a net requirement, the monitoring of demolitions and conversions is a crucial task and helps the Council to understand how the existing housing stock is changing*".
- 2.1.18. At the Preferred Options stage LPI003 a demolitions allowance of 29 dpa was added to the housing requirement. Paragraph 4.102 stated:
- 2.1.19. "*The housing requirement is a net housing need arising from population and economic factors, and account still needs to be taken of the likely impact of demolitions, conversions and changes to and from residential use. The loss of dwellings to demolitions and changes of use has averaged 26 dwellings per year over the ten year period 2006/07 to 2015/16, discount an abnormally high year (201 in 2008/09 resulting from housing clearances) and an abnormally low year (2 in 2009/10). The*

Council considers this to be a suitable indicator of future losses, and so in addition to the 20% uplift, a further requirement of 29 per annum is added to accommodate the demolitions and round the figure up to 570 dwellings per annum”.

- 2.1.20. Paragraph 4.18.9 of SD001 acknowledges that the housing requirement (of 486 dpa) “*is net of (i.e., in addition to) dwellings required to replace any demolition losses that may take place during the Plan period*”. However, the demolitions allowance has been removed from the Submission Draft Local Plan without explanation.
- 2.1.21. Paragraph 029 of PPG (Reference ID: 68-029-20190722) states that completions should be net figures, so should offset any demolitions. If an LPA is required to forecast gross completions (as it has done in SHBC007), then logically it follows therefore that an LPA should also forecast demolitions in order to arrive at a housing trajectory which contains net completions over the plan period.
- 2.1.22. It should be noted that in St Helens, the monitoring of ‘demolitions’ also includes the conversion and change of use of dwellings to other uses (Table 4.1 of SD025 and Section 4 of the 2013 HLPS), as these have the same negative effect on net completions.
- 2.1.23. Importantly, demolitions can only be automatically accounted for in ‘net completions’ reported within the housing trajectory SHBC007 where they fall within the same planning permission. To take the example at paragraph 5.8 of HOU002, this would include a planning permission such as for ‘demolition of existing dwelling and erection of 10 apartments’ (i.e. +9 net completions). However, St Helens has historically witnessed clearances of poor-quality housing stock which have been undertaken separately to and in advance of redevelopment projects. There are many examples of these sites within the 2017 SHLAA. It has also witnessed the conversion of residential to retail and commercial premises (e.g. in town centres). If demolition and rebuild does not occur within the same planning permission, then demolitions will not be taken into account in the net completions reporting.
- 2.1.24. Therefore, to be positively prepared, the Plan ought to reinstate a demolitions (and conversions) allowance of 29 dpa, which would reduce the supply by 464 dwellings. Consequently, the Plan should allocate a sufficient supply of additional sites to offset this impact in order to be positively-prepared.**

6. Does the Plan show sufficient flexibility in the supply to ensure that the housing requirement will be met over the Plan period (the Council’s latest figures show a residual requirement of 7778 units and potential housing supply of 8384 units assuming a Plan period until 2037)?

- 2.1.25. SHBC007 shows the Council’s calculated over-supply against residual has increased from 7.8% headroom (7,778 and 8,384) to 9.8% (7,132 and 7,831).
- 2.1.26. However, the Green Belt supply has been miscalculated in Table 5.4 of SHBC007. 264 homes have been added to the supply as a “20% increased allowance...to allow for contingencies”, but the corresponding row on Table 5.3 removes 443 homes from the SHLAA by way of 15% “capacity reduction for non-delivery”. Both tables should have the discount for non-delivery applied.
- 2.1.27. Regardless, **Appendix C** to this Statement shows that the supply is significantly less than the Council state: a total of 2,194 dwellings as calculated below.



8. Would greater certainty be provided within the Plan if SHLAA sites (or the larger sites) were to be allocated (see SHBC001 – PQ52)?

- 2.1.28. Potentially, yes. However, the contribution of the SHLAA sites to the potential supply has been over-estimated, as set out in **Appendix C**. Column Z of Appendix C provides our commentary on the SHLAA sites.

2.2 ISSUE 2: THE HOUSING TRAJECTORY

9. Is the evidence that supports the Housing Trajectory (Figure 4.3 as amended by Appendix 1 to SD025) based on realistic assumptions?

2.2.1. No. Please see our **Appendix C** for full explanation.

10. In particular:

a. Should a lapse rate be applied to sites expected to deliver in the next 5 years as well as those delivering later in the Plan period (see SHBC001 – PQ50)?

2.2.2. PQ50 satisfactorily addresses this point.

b. Is the evidence about the delivery of SHLAA sites contained within the SHLAA together with SD025 and SHBC004 robust?

2.2.3. No, please see **Appendix C** and also extracts from the 2012 SHLAA in **Appendix D**.

c. Is the evidence about delivery from stalled sites robust (see SHBC001 – PQ53)?

2.2.4. No, please see **Appendix C**. To summarise the specific sites listed in PQ53:

- HL189 is covered with trees and vegetation, the permission lapsed in 2016;
- RH11 was expected to resume construction and complete by 2017, according to the 2012 SHLAA – this has not happened;
- TC43 has had no construction taking place since 2008; the 2012 SHLAA expected a different scheme to be proposed, but it has not happened.

d. Are the assumptions about delivery from allocations robust (discussed under Matter 4)?

2.2.5. The assumptions appear uninformed; no consultation with developers on build-out rates appears to have been held let alone evidenced – contrary to paragraph 74 of the NPPF and several parts of PPG on Housing Supply and Delivery.

e. Are lead in times and build out rates realistic?

2.2.6. Generally, the Council over-estimate the supply of new homes in the first year of houses being built on a site, the build-rate usually starts lower and then accelerates.

2.2.7. Appendix 6 of SD025 is helpful but it would assist if this took into account the type of builder (eg SME, national 'volume' housebuilder), the number of builders (larger sites may be delivered by more than one housebuilder) and the type of development (eg apartments, greenfield houses).

2.2.8. There appears to have been no consultation with developers who control major sites within the trajectory.

f. Is the significant spike in delivery shown in the trajectory between 2025/26 and 2026/27 realistic and supported by evidence (see SHBC001 – PQ54)?

2.2.9. Analysis based on **Appendix C** to this Hearing Statement shows that there will be a projected increase between 2025/6 and 2026/7, due to the significant under-supply in the first five years post-adoption. A spike can be realistic.

2.2.10. To conclude on the housing trajectory, more land needs to be allocated for development to ensure a five-year supply upon adoption and throughout the plan period. The shortfall by the end of the plan period will be 2,194 homes.

2.3 ISSUE 3: FIVE YEAR HOUSING LAND SUPPLY

11. Is the use of a 5% buffer to calculate the housing land supply position appropriate?

2.3.1. No. A 10% buffer should be applied in accordance with paragraph 73b of NPPF.

12. Is the inclusion of 465 units from small sites in the 5-year supply justified?

2.3.2. No. As noted above, there is no evidence to support 93 dpa; windfalls on small sites should not be accounted for in the first five-years.

13. Generally, are the assumptions about the delivery from commitments, SHLAA sites and allocations within the 5-year supply realistic?

2.3.3. No. **Appendix C** provides a detailed breakdown of the supply to explain why not.

14. Are lead in times and build out rates within the 5-year supply realistic?

2.3.4. No. **Appendix C** provides a detailed breakdown of the supply to explain why not.

15. Are there any measures that the Council can take to provide more elbow room in terms of the 5-year supply? Note - SHBC001 – PQ55 refers to the possibility of a stepped housing requirement and/or increasing the small sites allowance.

2.3.5. Stepping the housing requirement UP in the first five years post-adoption will meet the objectives of boosting the supply of new homes or addressing housing need. Stepping the requirement DOWN in the first five-years post adoption would undermine the objectives and would not be positively-prepared or effective.

2.3.6. Increasing the small sites allowance would be fruitless and not justified. The number of homes on small sites would be independent of the plan-making process and is very difficult for the Council to control or influence – and as noted above, the allowance should not be accounted for in the 5YHLS equation.

2.3.7. Additional allocations are the solution, and would be a better deployment than trying to artificially step requirements.

16. Will there be a five-year supply of deliverable housing sites on adoption of the LP?

2.3.8. The update provided in Appendix 2 of SHBC007 reveals that the 5YHLS position as at 31 March 2021 (over the period 2021/22 to 2025/26) is 4.6 years against an adjusted annualised housing requirement of 510 dpa (486 dpa + 5% buffer).

2.3.9. This figure is disputed and the real position is even worse. Table 2-1 below calculates the 5YLS based on 486 dph. A higher requirement will render the position worse still.

- **SHBC007 shows 190 homes need to be allocated for the first five years.**
- **If a 10% buffer is correctly applied, SHBC007 would show 311 homes need to be allocated for the first five years;**
- **Even more land would need to be allocated if the housing requirement increased.**

Table 2-1 – Analysis of five-year supply

Five Year Housing Land Requirements and Supply	(Oct 2020) [SD025]	Updated Supply Assessment – Summary Position (Feb 2021) [SHBC004]	Updated Supply Assessment – SHLAA Tables (Feb 2021) [SHBC004]	(May 2021) [SHBC007]	WSP Analysis (May 2021)
Local Plan Annual Housing Requirement	486	486	486	486	486
Local Plan Housing Requirement (2016/17-2020/21)	1,944	1,944	1,944	2,430	2,430
Net Completions (2016/17-2020/21)	2,428	2,428	2,428	3,074	3,074
Local Plan Housing Shortfall (2016/17-2020/21)	0	0	0	0	0
Core Strategy Housing Shortfall (2011/12-2015/16)	0	0	0	0	1,241
Local Plan Housing Requirement (2021/22-2025/26)	2,430	2,430	2,430	2,430	3,671 (2,430 + 1,241)
Buffer applied	5%	5%	5%	5%	10%
Local Plan Housing Requirement (2021/22-2025/26) with buffer	2,552	2,552	2,552	2,552 (nb: 2,673 if 10%)	4,038
Annualised Housing Requirement	510	510	510	510 (535 if 10% buffer)	808
Five Year Supply (2021/22-2025/26)					
Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	648	656	643	602	576
Large sites - planning permission under construction (including SHLAA 2017 and new large sites with planning permission and under construction)	526	526	518	512	460
Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that have now expired)	268	208	208	208	28
Large sites - historically implemented but now stalled	0	0	1	0	0

Five Year Housing Land Requirements and Supply	(Oct 2020) [SD025]	Updated Supply Assessment – Summary Position (Feb 2021) [SHBC004]	Updated Supply Assessment – SHLAA Tables (Feb 2021) [SHBC004]	(May 2021) [SHBC007]	WSP Analysis (May 2021)
Local Plan Allocations (including those previously counted as SHLAA sites, 3HA, 6HA, 9HA and 10HA)	647	647	647	575	552
Small sites allowance	465	465	465	465	0
Demolitions allowance	0	0	0	0	-145
Total supply	2,554	2,502	2494	2,362	1,471
Over/undersupply	2	-50	-58	-190 (-311 if 10% buffer)	-2,567
Years supply of deliverable housing land	5.00	4.90	4.89	4.6 (4.4% if 10% buffer)	1.82 ³

2.3.10. Evidence underpinning the land supply in this table is provided in **Appendix C**.

17. Will Policy LPA05 as worded be effective in maintaining delivery through the Plan period?

2.3.11. No. Table 2-2 below refers, which is supported by the evidence in **Appendix C**.

³ If the shortfall is not added as we advocate, the year's supply would still only be 2.75 years

Table 2-2 – Supply throughout plan period

Local Plan Housing Supply (2021/22-2036/37)		Updated Supply Assessment – Summary Position (Feb 2021) [SHBC004]	Updated Supply Assessment – SHLAA Tables (Feb 2021) [SHBC004]	Updated Housing Land Supply Position (May 2021) SHBC007	WSP Updated Analysis (May 2021)
Deliverable 0-5 years	Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	656	643	602	576
	Large sites - planning permission under construction (including SHLAA 2017 and new large sites with planning permission and under construction)	526	518	512	460
	Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that have now expired)	208	208	208	28
	Large sites - historically implemented but stalled	0	13	0	0
	Local Plan Allocations (including those previously counted as SHLAA sites 3HA, 6HA, 9HA and 10HA)	647	647	575	552
	Small sites - allowance	465	465	465	0
	Demolitions allowance	0	0	0	-145
	Sub total	2,502	2,494	2,362	1,471
Developable 6-10 years	Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	128	148	189	224
	Large sites - planning permission under construction (including SHLAA 2017 and new large sites with planning permission and under construction)	0	0	0	63
	Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that have now expired)	1,127	1,107	1,127	975
	Large sites - historically implemented but stalled	0	0	0	0
	Local Plan Allocations (including those previously counted)	1,691	1,691	1,691	1,494

Local Plan Housing Supply (2021/22-2036/37)		Updated Supply Assessment – Summary Position (Feb 2021) [SHBC004]	Updated Supply Assessment – SHLAA Tables (Feb 2021) [SHBC004]	Updated Housing Land Supply Position (May 2021) SHBC007	WSP Updated Analysis (May 2021)
as SHLAA sites 3HA, 6HA, 9HA and 10HA)					
	Small sites - allowance	465	465	465	465
	Demolitions allowance	0	0	0	-145
	Sub total	3,411	3,411	3,472	3,076
Developable 11-15 years	Large sites - planning permission not started (including SHLAA 2017 sites that have since gained planning permission but not started)	0	80	0	0
	Large sites - planning permission under construction (including SHLAA_2017 and new large sites with planning permission and under construction)	0	0	0	0
	Large sites - SHLAA sites (including SHLAA 2017 sites with planning permission that have now expired)	279	279	279	162
	Large sites - historically implemented but stalled	235	155	151	0
	Local Plan Allocations (including those previously counted as SHLAA sites 3HA, 6HA, 9HA and 10HA)	1,212	1,212	1,452	1,150
	Small sites - allowance	465	465	558	465
	Demolitions allowance	0	0	0	-145
	Sub total	2,191	2,191	2,440	1,632
TOTAL	Supply	8,104	8,096	8,274	6,179
Balance	Housing requirement (2016/17-2036/37)	9,234	9,234	10,206	11,447
	Housing completions (2016/17-2020/21)	2,428	2,428	3,074	3,074
	Residual housing requirement (2021/22-2036/37)	6,806	6,806	7,132	8,373
	Over/undersupply	1,298	1,290	1,142	-2,194

2.3.12. The tables below provide WSP's analysis compared with Tables 5.2 to 5.5 of SHBC007.

Table 5.2: Residual Housing Land Requirement 2016-2037

Requirement	LPA	WSP
St Helens housing requirement (21 years from 1 April 2016 to 31 Mar 2037) at average of 486 per year	10,206	11,447 ⁽⁴⁾
Net Completions from 1 April 2016- 31 March 2021	3,074	3,074
Residual requirement over Local Plan period from 1 April 2021 to 31 March 2037	7,132	8,373

Table 5.3: SHLAA Housing Land Supply 2021-2037

SHLAA Supply 2021 – 2037 (as of 31.03.2021)	LPA	WSP
Total SHLAA supply– 1 April 2021 until 31 March 2037 (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA)	4,766	4,003 ⁽⁵⁾
SHLAA capacity reduction for non-delivery (15% of SHLAA identified capacity for years 6-16 of the Plan period including non-Green Belt Local Plan allocation sites 3HA, 6HA,9HA and 10HA) (2953 - 15%)	-443	-375 ⁽⁵⁾
Residual SHLAA capacity over 16 year Plan period 1 April 2021 - 31 March 2037 (including non-Green Belt Local Plan allocation sites 3HA,6HA, 9HA and 10HA)	4,323	3,628
Small sites allowance x 16 years (sites below 0.25ha / 5 dwellings)	1,488	1,023 ⁽⁶⁾
Total Plan period capacity on non-Green Belt land	5,811	4,651

Table 5.4: Green Belt Land Supply 2021-2037

Green Belt Land Supply 2021-2037	LPA	WSP
Required capacity to be found on Green Belt land (7132-5811)	1,321	3,722 ⁽⁷⁾
20% increased allowance to be added to Green Belt required capacity (to allow for contingencies e.g., infrastructure provision, delays, lead-in times to start of housing delivery etc.)	264	744 ⁸
Overall required capacity of sites to be removed from the Green Belt	1,585	4,466
Total Plan period capacity of allocated sites removed from the Green Belt (sites 1HA, 2HA, 4HA, 5HA, 7HA and 8HA)	2,020	1,731

⁴ Including shortfall of 1,241 dwellings from the Core Strategy plan period (1 April 2011 to 31 March 2015)

⁵ 15% of 2,498

⁶ Small sites (windfall) allowance of 93 dpa applied to years 6-16 only

⁷ 8,373 – 4,651

⁸ NB this figure should preferably be a reduction for non-delivery rather than a positive, but for consistency and ease of comparison is retained as per the Council's.



Table 5.5: Total Supply over the Plan Period 2021-2037

Total Supply over the Plan Period 2021-2037	LPA	WSP
Total Plan period capacity on non-Green Belt land	5,811	4,651
Total Plan period capacity of allocated Green Belt sites	2,020	1,731
Total housing supply over Plan period	7,831	6,682

- 2.3.13. To conclude:
- 2.3.14. The housing requirement should be increased to 11,447 to take account of historic shortfall, which should be dealt with in the first five years of the plan.
- 2.3.15. The housing supply in the first five years should be reduced by 465 (93 dpa) assumed on small windfalls and should be reduced by 145 for assumed demolitions.
- 2.3.16. The housing supply in the first five years should be reduced by 751, reflective of identified problems with the sites forming part of the supply.
- 2.3.17. The housing supply in the plan period should be reduced by 1,149, reflective of identified problems with the sites forming part of the supply.
- 2.3.18. New homes need to be allocated for delivery in the first five years.
- 2.3.19. New homes need to be allocated for delivery in years 6-15.
- 2.3.20. Site 1HS is the safeguarded site most appropriate to be allocated to help address this shortfall.

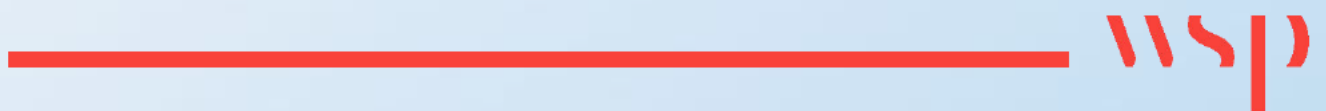
Appendix A

CORE STRATEGY BACKGROUND PAPER



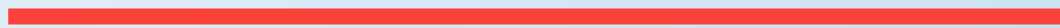
Appendix B

HOUSING POSITION PAPER 2013



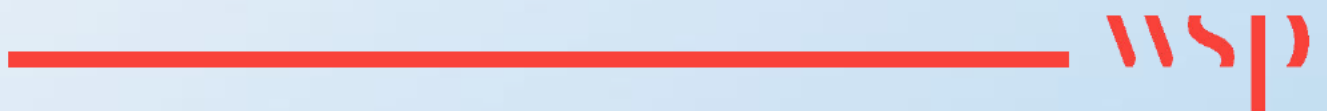
Appendix C

HOUSING SUPPLY ANALYSIS



Appendix D

EXTRACTS FROM 2012 SHLAA





WSP Sub-Appendix	SHLAA Ref	Site Name
1	13	Carnegie Crescent
2	22	Fairclough Street and Wargrave Road
3	23	Liverpool Arms, Sacred Heart School
4	31	Sutton Arms, Elephant Lane
5	58	Central Works Church Lane
6	59	56-120 Eccleston Street
7	63	Waterdale Crescent
8	74	Crow Lane West
9	82	Laffak Road
10	84	Heather Brae
11	91	Milton Street
12	96	Warrington Road
13	103	Vicarage Road
14	109	Piele Road
15	112	Juddfield Street
16	113	Willow Tree Avenue
17	123	Sutton Moss Road
18	129	Derbyshire Hill Family Centre
19	134	Littler Road
20	135	Newby Place
21	151	Marshalls Cross Road
22	RH11	Stonecross Drive
23	TC43	Shaw Street



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