

Affordable Housing Proof of Evidence of Jamie Roberts MPlan MRTPI

Land to the east of Froghall Road, Cheadle

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Outline application for residential development with access considered
(all other matters reserved)

Land to the east of Froghall Road, Cheadle

Appeal by Bloor Homes NW

January 2025

PINS REF: APP/B3438/W/24/3351035

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Contents

Section 1	Introduction	1
Section 2	Affordable Housing as an Important Material Consideration	4
Section 3	The Consequences of Failing to Meet Affordable Housing Needs	7
Section 4	The Development Plan and Related Policies	13
Section 5	Affordable Housing Needs	22
Section 6	Affordable Housing Delivery	25
Section 7	The Future Supply of Affordable Housing	32
Section 8	Affordability Indicators	37
Section 9	Council's Assessment of the Application	47
Section 10	The Benefits of the Proposed Affordable Housing	50
Section 11	The Weight to be Attached to the Proposed Affordable Housing Provision	52

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Appendices

- Appendix JRO1 [Freedom of Information Correspondence dated 25 November 2024 and 23 December 2024](#)
- Appendix JRO2 [Relevant Extracts from the Planning Practice Guidance](#)

Core Document References

CD4	Decision notice and committee report
CD4.1	Decision Notice ref. SMD/2021/0610
CD4.2	Committee Report
CD5	Local policy documents and guidance
CD5.1	The Adopted Local Plan 2014 - 2033
CD6	National planning policy and statements
CD6.2	NPPF – December 2024
CD6.4	Written Ministerial Statement 30 July 2024 - Building the Homes We Need
CD6.8	Written Ministerial Statement 12 Dec 2024 - Building the Homes We Need
CD7	Housing land supply and monitoring documents
CD7.1	Statement of Five Year Housing Land Supply (as at 1st April 2023) - Nov 2023
CD11	Affordable housing related documents
CD11.1	“Bleak Houses: Tackling the crisis of family homelessness in England”; Children's Commissioner, 2019
CD11.2	“Denied the Right to a Safe Home: Exposing the Housing Emergency”; Shelter, 2021
CD11.3	Developer Contributions Supplementary Planning Document October 2023
CD11.4	Homelessness and Rough Sleeping Strategy 2023 to 2028
CD11.5	Staffordshire Moorlands Corporate Plan 2023 to 2027
CD11.6	Housing Implementation Strategy November 2018
CD11.7	Staffordshire Moorlands Strategic Housing Market Assessment Update 2017
CD12	Relevant decisions & judgements
CD12.31	Appeal 3324631 - Sondes Place Farm, Dorking
CD12.32	Appeal 3230827 - Oxford Brookes University
CD12.33	Appeal 3332590 - Coombebury Cottage, Dunsfold
CD12.34	Appeal 3136237 - Langton Road, Norton
CD12.35	Appeal 3282908 - Hawkhurst, Kent
CD12.36	Appeal 3296426 - Radwinter Road, Saffron Walden
CD12.37	Appeal 3191477 - Park Road, Coalpit Heath
CD12.38	Appeal 3274818 - Land off Ashland Road West, Sutton in Ashfield

Introduction

Section 1

- 1.1 This **Affordable Housing Proof of Evidence** has been prepared by **Mr Jamie Roberts MPlan MRTPI of Tetlow King Planning** on behalf of the Appellant, Bloor Homes NW, in respect of the appeal reference APP/B3438/W/24/3351035 for residential development at Land to the east of Froghall Road, Cheadle, Staffordshire.
- 1.2 For administrative purposes, the Local Planning Authority is Staffordshire Moorlands District Council (“the Council”) within the West Midlands region. The appeal site is located partly within Cheadle North East council ward, and partly within Churnet council ward. It is also located partly within Cheadle Civil Parish, and partly within Kingsley Civil Parish.
- 1.3 Outline planning permission is sought for up to 215 dwellings, of which **33% or up to 71 dwellings will be affordable**, to be secured through a Section 106 planning obligation. The proposed development meets the requirements of adopted Local Plan Policy H3 ‘Affordable Housing’ which seeks 33% affordable housing on qualifying sites.
- 1.4 The tenure mix of the affordable housing provision will be determined at reserved matters stage and would reflect the requirements of Policy H3 of the Local Plan, or subsequent policy and guidance, or as agreed with the Council.
- 1.5 This Proof of Evidence deals specifically with affordable housing and the weight¹ to be attributed to it in this planning decision considering the evidence of need in the area.
- 1.6 My Proof of Evidence should be read alongside the evidence of:
 - a. John Coxon of Emery Planning, on planning matters (including an appended statement by my colleague, Andrew Moger, on self- and custom-build housing);
 - b. Tim Jackson of FPCR, on landscape;
 - c. Ben Pycroft of Emery Planning, on five year housing land supply;
 - d. Gail Stoten of Pegasus Group, on heritage; and
 - e. Phil Wooliscroft of Eddisons, on highways.

¹ For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial and very substantial.

1.7 My credentials as an expert witness are summarised as follows:

- a. I hold a Master of Planning (MPlan) degree in Urban Studies and Planning from the University of Sheffield (2013). I am a chartered member of the Royal Town Planning Institute.
- b. I have over eleven years' professional experience in the field of town planning. I was first employed in 2013 at a national planning consultancy in the East of England. I joined Tetlow King Planning in 2019 and became an Associate Director in December 2024.
- c. I have previously given evidence to inquiries and hearings as well as Local Plan examinations in recent years, throughout England, at which my evidence and methodology have been accepted and endorsed by Inspectors.
- d. I act for a range of clients including housebuilders, strategic land promoters, and housing associations. My work is primarily in the residential sector, with interests in matters of housing need and affordable housing.

1.8 In accordance with the Planning Inspectorate's Procedural Guidance, I declare that:

"The evidence which I have prepared and provide for this appeal reference APP/B3438/W/24/3351035 in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions."

1.9 **It is a key priority of national planning policy to significantly boost the delivery of housing, and in particular affordable housing.** This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the new Government's recent Written Ministerial Statements ("WMS"). A thriving housing market that offers choice, flexibility and affordable housing is critical to our economic and social wellbeing.

1.10 In preparing this evidence, I place reliance on data sought from the Council through a Freedom of Information ("Fol") request made on 30 October 2024. A partial response was received on 25 November 2024, with further information received on 23 December 2024. The complete Fol correspondence can be found at **Appendix JRO1** to this Proof of Evidence.

1.11 This Proof of Evidence comprises the following ten sections:

- Section 2 establishes the importance of affordable housing as an important material consideration;
- Section 3 considers the consequences of failing to deliver enough affordable housing;
- Section 4 reviews the Development Plan and related policy framework including relevant corporate documents produced by Staffordshire Moorlands District Council;
- Section 5 sets out the identified affordable housing needs in Staffordshire Moorlands;
- Section 6 examines past affordable housing delivery against identified needs;
- Section 7 considers the future supply of affordable housing;
- Section 8 covers a range of affordability indicators;
- Section 9 considers the Council's own assessment of the proposed development;
- Section 10 identifies the benefits of the proposed affordable housing at the appeal site; and
- Section 11 reaches conclusions on the weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF").

National Planning Policy Framework (12 December 2024) (CD 6.2)

- 2.2 The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-taking processes.
- 2.3 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) is to *"support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations"* (my emphasis).
- 2.4 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:

"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed [...] The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community" (my emphasis).

- 2.5 It should be stressed that paragraph 61 identifies the 'overall aim' as to meet an area's identified housing need. Paragraph 62 clarifies that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance"*.

- 2.6 Paragraph 63 also makes clear that *“within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent)...”* (My emphasis).
- 2.7 The NPPF places a core responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. In particular, paragraph 66 establishes that *“where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures”*.
- 2.8 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *“housing for sale or rent, for those whose needs are not met by the market [...] and which complies within one or more of the following definitions”* before identifying four categories of affordable housing: Social Rent in accordance with Government’s conditions and requirements; other affordable housing for rent which is at least 20% below market value; discounted market sales housing which is at least 20% below market value; other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

“Building the Homes We Need” Written Ministerial Statement (30 July 2024)
(CD 6.4)

- 2.9 On 30 July 2024, the Secretary of State, Angela Rayner MP, delivered a Written Ministerial Statement (“WMS”) indicating the ‘direction of travel’ for the new Government’s intentions for national planning policy.
- 2.10 The WMS set out the Government’s aspirations to drive the delivery of affordable homes, stating that *“the Government are committed to the biggest growth in social and affordable housebuilding in a generation”* and setting an objective to deliver 1.5 million homes during the current Parliament.

“Building the Homes We Need” Written Ministerial Statement (12 December 2024) (CD 6.8)

- 2.11 In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government’s objective to deliver 1.5 million homes during the current Parliament and made a series

of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

“This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters’ income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.” (my emphasis)

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.12 The Planning Practice Guidance (“PPG”) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application. **Appendix JRO2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

- 2.13 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority of successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

The Consequences of Failing to Meet Affordable Housing Needs

Section 3

- 3.1 In 2011, the former Coalition government published *“Laying the Foundations: A National Housing Strategy for England”*. It sets out that **a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing**. The Strategy foreshadowed several policy initiatives that were implemented over the following years, including the introduction of the first NPPF in 2012 alongside the ‘Help to Buy’ programme (now ended) and reforms to the Right to Buy.
- 3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply; despite the debate taking place *over a decade ago* and under a different Government, the issues remain prevalent. The commentary is sadly still pertinent to the issues surrounding affordable housing in Staffordshire Moorlands District.
- 3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised during the debate, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:
- “I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”*
- 3.4 When asked to clarify the word *“crisis”* by the Member for Tewkesbury, Mr Boles commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis *“is intense within the south-east and the south, but there are also pockets in parts of Yorkshire”*.

3.5 In response to questions, Mr Boles reaffirmed that:

“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.

3.6 He went on to say: *“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”*

3.7 **Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs.** The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

3.8 Mr Boles indicates there are *“a lot of statistics to prove it”*; my evidence in subsequent sections sets out an array of statistics, which I consider demonstrates the housing crisis remains as prominent now as it did in 2013.

3.9 On 20 November 2024, the new Minister for Housing and Planning, Matthew Pennycook, addressed the Housing, Communities and Local Government Select Committee, explaining how the incoming Government proposes to respond to what Mr Pennycook described as *“an acute and entrenched housing crisis in England”*.

3.10 Mr Pennycook reminded the Select Committee of the implications of the housing crisis in stark terms, explaining that:

“We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates.”

- 3.11 Mr Pennycook then summarised the scale of the housing challenge – especially for affordable housing – explaining that:

“I would just reiterate to the Committee what a dire situation we are in, in terms of the collapse in supply—particularly affordable supply—that we have inherited. It is going to take some serious measures to turn around.”

- 3.12 Sadly, it appears that the concerns expressed by Mr Boles over a decade ago, remain prevalent today. The evidence shows that the housing crisis is undeniable and has, if anything, become entrenched over recent years.

The Consequences of Failing to Meet Affordable Housing Need

- 3.13 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.

- 3.14 In August 2019 the Children’s Commissioner produced a report titled *“Bleak Houses: Tackling the Crisis of Family Homelessness in England”* (CD 11.1) to investigate the impact of homelessness and in particular the effect of this upon children.

- 3.15 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms².

- 3.16 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.

- 3.17 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that *“Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work”*.

- 3.18 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and no choice but to move out of their local area, which can have a *“deeply disruptive impact on family life”*. This can include lack of support (from grandparents for example) and travel costs.

² The Children’s Commissioner Report references a National Audit Office Report titled ‘Homelessness’ (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 3.19 It found that a child's education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children's educational development can also be delayed.
- 3.20 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 3.21 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a *"significant impact on many aspects of their lives"*.
- 3.22 More recently in May 2021, Shelter published its report *"Denied the Right to a Safe Home – Exposing the Housing Emergency"* (CD 11.2) which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that *"we will only end the housing emergency by building affordable, good quality social homes"* (page 10).
- 3.23 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years, the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

"Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it's damp, cramped, or away from jobs and support networks." (page 5)

"... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option." (page 5)

"The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability." (page 6)

“If you live in an overcrowded home, you’re more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer.” (page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding.” (page 12)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%).” (page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn.” (page 25)

“Landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.” (page 29)

“The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing.” (page 30)

- 3.24 At page 32, Shelter estimates that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market.
- 3.25 The report concludes at page 33 that for change to happen, *“we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing*

*benefit. But when it comes down to it, there's only one way to end the housing emergency. **Build more social housing***" (emphasis in original).

- 3.26 It is also important to highlight that Staffordshire Moorlands District Council itself recognises the social and economic consequences of failing to meet affordable housing needs at the local level. This is discussed in Section 4 of this Proof of Evidence in relation to the adopted Development Plan and relevant corporate documents.

Conclusions

- 3.27 Evidently, the consequences of failing to meet affordable housing needs in *any* local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:
- a. A lack of financial security and stability;
 - b. Harmful impacts on physical and mental health;
 - c. Decreased social mobility;
 - d. Negative impacts on children's education and development;
 - e. Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
 - f. Being housed outside social support networks;
 - g. Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food, heating, or other utilities; and
 - h. An increasing national housing benefit bill.
- 3.28 **These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need.** An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.
- 3.29 I am strongly of the opinion that a step change in delivery of affordable housing is needed now.
- 3.30 The acute level of affordable housing need in Staffordshire Moorlands District coupled with worsening affordability will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions are to be taken in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The statutory Development Plan for Staffordshire Moorlands is the Staffordshire Moorlands Local Plan 2014 to 2031, which was adopted in September 2020.
- 4.3 There are no relevant Neighbourhood Plans that cover the Appeal Site.
- 4.4 Other material considerations relevant to the proposed development include the NPPF; the PPG; the Homelessness and Rough Sleeping Strategy 2023-28; Staffordshire Moorlands Corporate Plan 2023-2027; the Developer Contributions Supplementary Planning Documents (October 2023); and the Housing Implementation Strategy November 2018.

The Development Plan

Staffordshire Moorlands Local Plan 2014 to 2033 (September 2020) (CD 5.1)

- 4.5 The Staffordshire Moorlands Local Plan (the “Local Plan”) was adopted in September 2020 and covers the 19-year period between 2014 and 2033. The Local Plan should be understood in the context of a third of the Staffordshire Moorlands District Council area being within the Peak District National Park and excluded from the Local Plan.
- 4.6 Chapter 2 of the Local Plan provides a ‘*Portrait of Staffordshire Moorlands*’. Paragraph 2.3 at page 19 sets out some of the wider context for housing in the District; it explains that after a period of population decline in the 1990s, the population of the District has been increasing since the early 2000s. Paragraph 2.7 notes that the Council transferred its housing stock to ‘Moorlands Housing’ in 2001. Paragraph 2.8 discusses housing costs, explaining that that house prices increased rapidly from 2001 to 2007, although as of 2015 the median house price remained low in comparison to the County and England as a whole.
- 4.7 Paragraph 2.13 at page 20 notes that economic activity rates in the District are higher than the regional and national averages – but that wages are lower than both.

- 4.8 Paragraphs 2.14 to 2.16 at page 20 go on to note that the District contains pockets with high levels of deprivation – including the Cheadle North East area where the appeal site partly lies – and has notably poor health levels.
- 4.9 Chapter 3 identifies the spatial planning challenges which face the District. The first challenge identified at page 24 is ‘*Accommodating and delivering growth*’ and states that the “*development requirements for the District, including housing*” need to be met alongside the need to “*address historic under delivery*”.
- 4.10 ‘*Adapting to changes in population structure*’ is stated to be a challenge at page 25, with a “*decline in the numbers of younger people and families*’ being a ‘*major concern*” which will require “*providing affordable housing for future generations and providing appropriate local employment opportunities*” to address. It goes on to state:
- “Unless sufficient new housing is delivered to attract people of working age to the District, a projected decline in the working age population will have a detrimental impact on the local economy by restricting the supply of labour leading to a decline in businesses and the number of jobs in the District”* (my emphasis).
- 4.11 Page 25 continues by noting a further challenge to be “*Improving the housing market*” where there “*is a high need for affordable housing (224 to 432 per year) that is unlikely to be fully delivered through developer contributions alone*” (my emphasis). I discuss the extent of the affordable housing need in Staffordshire Moorlands in more detail at Section 5 of this Proof of Evidence.
- 4.12 Page 25 carries on by highlighting imbalances in the housing market, stating that “*There is a need to re-balance the housing stock for example a need for more terraced properties and more rental sector properties and better quality, aspirational properties to reduce the levels of net out-migration to neighbouring areas*”. Page 26 sets out the challenge of “*Tackling social exclusion and economic decline in the rural areas*” and notes here that the “*need for affordable housing is particularly critical to encourage young and/or smaller households to remain in the rural settlements but smaller sites and higher land values can make their delivery difficult*” (my emphasis).
- 4.13 Taking the above passages into account, it is clear to me that the Local Plan draws a clear link between a lack of housing for younger households (including affordable housing) and a decline in the working age population the economic challenges faced by the District.

- 4.14 Chapter 4 outlines the vision of the Local Plan, which includes the aim at page 30 for *“urban and rural communities which have an excellent quality of life with access to appropriate, affordable and desirable housing”*.
- 4.15 Central in the spatial vision set out on page 30 is the link between housing and the District’s economic trajectory.
- “There will be a more flexible and proactive approach to employment development, raising the District’s economic fortunes by exploiting its assets, raising local skill levels and opportunities and addressing deficiencies and disadvantages. Importantly, we will tackle the potential issues relating to an ageing population by supporting inward investment providing desirable housing for people of working age”* (my emphasis)
- 4.16 A ‘Vision for Cheadle’ is set out on page 31, which notes that *“Cheadle will become a more sustainable settlement”* with and enhanced and enlarged *“role as a significant service centre [...] achieved through a focus on growth in housing and employment provision”*.
- 4.17 Chapter 5 provides the aims and objectives of the Local Plan. Spatial Objective SO4 at page 35 is to *“provide new housing that is affordable, desirable, well-designed and meets the needs of residents of the Moorlands”*.
- 4.18 Chapter 6 provides the spatial strategy and strategic policies of the Local Plan. The supporting text to Policy SS3 (Future Provision and Distribution of Development) discusses the extent of the need for development in the district, including the need for affordable housing.
- 4.19 Paragraph 6.18 at pages 41 and 42 sets out the overall need for housing in the District. It explains that *“The 2017 SHMA update concluded that the housing needs of the District lie within the range of 235 to 330 additional homes per year up to 2031. The top of the range relates to the level of housing growth required to support potential employment growth, whilst the bottom reflects household projections. The latter would lead to a decline in the number of jobs in the District due to a decline in the working age population”*.
- 4.20 Paragraph 6.19 at page 42 goes on to highlight the extent of the affordable housing need, noting that the overall housing need *“also reflects an uplift to support additional affordable housing of which there is a relatively high need in the District (224 to 432 homes per year)”*. I return to the topic of the affordable housing need in Section 5 of this Proof of Evidence.

4.21 Paragraphs 6.20 to 6.22 at page 42 expand upon the development objectives of the Local Plan as being to deliver “6,080 dwellings for the period 2014 – 2033 (320 per year)” i.e. close to the upper extent of the overall housing need of 330 dwellings per annum set out in the SHMA Update 2017. Importantly, the third bullet point of paragraph 6.20 explains that this level of provision is intended to “*help address the affordable housing need*” – i.e. **the overall plan requirement is set at a level that is intended to better contribute to meeting affordable housing needs**, even if the Local Plan earlier acknowledges at page 25 that meeting the need in full is unlikely.

4.22 Policy SS3 at page 43 includes the requirement that:

“Provision will be made for at least 6080 additional dwellings (net of demolitions) to be completed in Staffordshire Moorlands during the period 2014 to 2033 - an annual average of 320 homes per year. Sufficient deliverable land will be identified to provide at least 5 years of development at all times.

The Council will monitor the annual development rate and manage supply to ensure that future provision will continue to adequately meet identified needs and reflect development potential.”

4.23 Policy SS7 ‘Cheadle Area Strategy’ at page 57 sets out how the Local Plan’s vision for Cheadle will be delivered, including the delivery of affordable housing. This includes under point 1 of policy SS7 “*Increasing the range of available and affordable house types and higher market housing, including for first time buyers and families*”.

4.24 Chapter 7 of the Local Plan provides development management policies. The introduction to the housing policies at paragraph 7.45 at page 91 refers back to Spatial Objective 4 (as discussed above) and reaffirms that affordable housing provision is a priority for Staffordshire Moorlands District Council:

“The provision of sustainable, decent and affordable housing for all sectors of the community remains one of the priorities of the Council, the Sustainable Community Strategy and of the Local Plan.”

4.25 **Policy H3 ‘Affordable Housing’** is the principal policy for affordable housing in the Local Plan. At page 97, paragraph 7.55 of the supporting text to Policy H3 sets out in stark terms the housing challenges in Staffordshire Moorlands – including the difficulties in affording housing and the impact upon the District’s population. It states that:

“The limited supply of, and high demand for, housing in Staffordshire Moorlands has led to high prices and rents. It is now extremely difficult for local people on low incomes and increasingly those on middle incomes to afford a home of their own. This is particularly so in the rural areas. Unless more affordable housing is provided, there is a danger that those on lower and middle incomes, particularly the young, will be forced to leave the district in increasing numbers. As a result, our communities will be damaged and the district’s age and social structure will become even more biased towards the elderly and the wealthy” (my emphasis).

- 4.26 In my view, this is a clear and important recognition of the difficulties in accessing housing in the District and the serious socio-economic impacts that will follow – unless more affordable housing is delivered.
- 4.27 Paragraph 7.56 at page 97 expands upon this theme, noting that there is a *“need for affordable housing in the District which exceeds the District’s average annual development rate requirements”*. It recognises that requiring 100% affordable housing is *“unrealistic”* and delivery will be limited by viability.
- 4.28 The wording at policy H3 is set out at page 98 and its key provisions are to seek **33% on-site affordable housing** on qualifying sites, alongside an expected **tenure split of 60% social / affordable rent and 40% intermediate / starter homes**. For ease of reference I set out the text of Policy H3 below.

Policy H3: Affordable Housing
1) Residential developments of 10 dwellings (or 0.5ha) or more shall provide 33% affordable housing. Where justified, the Council will consider a lower level of provision taking into account the Local Plan and Site Allocations Viability Study, other up-to-date viability evidence and other contributions. Affordable housing should normally be provided on-site. Provision off-site or through a commuted sum payment in lieu will only be considered where it will be of broadly equivalent value to on-site provision and it can be robustly justified in delivering affordable homes through mixed and balanced communities. 2) Unless circumstances dictate otherwise and in agreement with the Council, 60% of all affordable dwellings provided on each site will be social / affordable rented housing with the remaining 40% being intermediate / starter homes. 3) In or on the edge of villages, affordable housing schemes that are of an appropriate scale for the spatial strategy will be permitted on suitable rural exceptions sites which are well related to services and facilities and where a demonstrable need exists within the local area which cannot otherwise be met by means of provision in the plan. Small numbers of market homes may be allowed at the Council’s discretion where it would facilitate the provision of significant additional affordable housing to meet the needs of the local community. 4) Affordable housing should be designed as an integral part of developments and be ‘tenure blind’ in relation to other properties within the site.

5) In areas of low demand or where the stock does not meet and is not capable of meeting local housing market needs consideration will be given, in consultation with local communities, to options for renovation/improvement or redevelopment schemes to create more sustainable and balanced housing.

- 4.29 The monitoring framework is outlined at Section 9, at pages 158 and 159 of the Local Plan. Targets and indicators are set out in the tables between pages 160 and 182.
- 4.30 In relation to Policy H3 at page 173, the relevant indicators are the *“Number of affordable dwellings completed”*; the *“Number of affordable dwellings completed on windfall sites detailed by the settlement hierarchy”*; and the *“Number of 100% affordable housing schemes completed by type and location”*. The associated target is the *“Increased provision of affordable housing in accordance with policy”*.

Other material considerations

- 4.31 Policy and strategy documents for Staffordshire Moorlands similarly identify a pressing need for affordable housing in the District. These include:
- a. the Developer Contributions Supplementary Planning Document October 2023 (**CD 11.3**);
 - b. the Homelessness and Rough Sleeping Strategy 2023 to 2028 (**CD 11.4**);
 - c. the Staffordshire Moorlands Corporate Plan 2023 to 2027 (**CD 11.5**); and
 - d. the Housing Implementation Strategy November 2018 (**CD 11.6**).

Developer Contributions Supplementary Planning Document October 2023 (CD 11.3)

- 4.32 The Developer Contributions Supplementary Planning Document (the “SPD”) was adopted in October 2023 and sets out the Council’s approach to contributions and obligations arising from development, including affordable housing.
- 4.33 Page 10 acknowledges that viability constraints may mean that it is not always possible to secure planning obligations that are compliant with the full policy requirement (i.e. 33%) and identifies those obligations which the Council will prioritise. On-site affordable housing is listed as the second highest priority, behind only the critical infrastructure required to deliver the development in question.
- 4.34 In other words, affordable housing provision is the Council’s highest priority once the contributions required to make the development feasible have been secured. Notably,

this identifies on-site affordable housing provision as a higher priority than contributions towards education, open space, and non-essential infrastructure.

- 4.35 Paragraphs 4.2 and 4.3 at page 15 reiterate the importance of affordable housing and the Council's commitment to supporting the Government's goal of significantly boosting the supply of homes.
- 4.36 The SPD continues at paragraphs 4.4 to 4.16 across pages 15 to 18 to outline in depth how the Council will approach the delivery of affordable housing, First Homes, and rural exception sites along with commuted sums. It includes the Council's expectations in relation to the standard of affordable housing to be provided and need to reflect local needs and nationally described space standards.

Homelessness and Rough Sleeping Strategy 2023 to 2028 (CD 11.4)

- 4.37 The Homelessness and Rough Sleeping Strategy outlines the Council's understanding of, and approach to, homelessness in the District. The role of sufficient and suitable supply of affordable housing is reiterated throughout the Strategy as part of the Council's efforts in both relieving and preventing homelessness. The Strategy sets out a backdrop of rising costs of living and an increasingly unaffordable housing market, which serve to drive homelessness and underlining the importance of affordable housing.
- 4.38 In the foreword at page 3 the Portfolio Holder for Communities, Councillor Cawley, observes that *"Homelessness has a devastating impact on individuals and families"* and that *"Not having a home makes it harder for people to maintain health and well-being, education and employment and contribute more widely to society"*.
- 4.39 In setting out the challenges and drivers of homelessness in the district at pages 6 and 7, a number of factors are identified. Amongst these are:
 - a. Social housing stock half that of the national average (page 6 notes there to be *"8.01% social housing stock compared with 16.6% nationally"*; I set out the latest Census 2021 data at Section 8 of this Proof of Evidence);
 - b. *"There is limited availability of social housing, in particular 1 bed general needs and larger 4 bed housing"* (page 7);
 - c. *"There is disparity between median rent prices and local housing allowance rates which makes private renting unaffordable. It is particularly challenging for single people under 35 years subject to the Shared Accommodation Room rate"* (page 7); and

- d. The rising cost of living; *“Significantly higher numbers of households renting privately, socially and with mortgages are anticipated to approach the Council for housing and homelessness assistance”* (page 7).
- 4.40 The vision and aims of the Strategy are identified on pages 8 and 9 and include an aim to *“Increase the range of affordable housing options available”* as part of Priority 4: Development Sustainable Supported and Settled Housing Solutions. This is identified in the context of an *“increasingly unaffordable housing market”*.
- 4.41 Page 10 identifies the need to *“Increase affordable housing options available to both prevent and relieve homelessness”* as priority of the strategy. This is expanded upon at pages 17 and 18; the first paragraph of Priority 4 on page 17 states:

“We want to maximise every mechanism to increase the number of affordable housing options available to both prevent and relieve homelessness ensuring long-term solutions.”

Staffordshire Moorlands Corporate Plan 2023 to 2027 (CD 11.5)

- 4.42 The Staffordshire Moorlands Corporate Plan (the “Corporate Plan”) sets out the Council’s overall vision and priorities for the District between 2023 and 2027. The Corporate Plan is structured around ‘priority outcomes’ at page 4 which *“will be given the highest priority and a significant proportion of the Council’s resources will be directed towards them”*.
- 4.43 A number of key challenges in the District which the Council is seeking to address, ‘Low growth – housing and business’ along with the rising cost of living is identified, on page 7, as one of these challenges.
- 4.44 Pages 13 notes that *“Disposable incomes are declining”* despite relatively high pay for the region, driven by the increasing cost of living. Page 14 discusses housing challenges, noting that *“The delivery of additional new homes is below target”* in the context of a small social housing stock compared with the UK as a whole.
- 4.45 Increasing the supply of homes is identified at page 25 part of as Aim 1 of the Corporate Strategy and at page 26 it is explained that the Council will *“Develop a strategy for further development of social, affordable and specialist housing”*. Page 27 states that *“An increased supply of quality affordable housing”* is a priority outcome.

Housing Implementation Strategy 2018 (CD 11.6)

- 4.46 The Housing Implementation Strategy (the “HIS”) was adopted in November 2018 and sets out the Council’s strategy for housing delivery.
- 4.47 Section 4 titled ‘Affordable Housing Need’ at page 6 provides a review of the successive Strategic Housing Market Assessments in 2014 and 2017, setting out their findings and differences in approach. It acknowledges at page 6 that there is a *“relatively high need”* for affordable housing in the District going on to state the need for affordable housing was greater than that of the *“objectively assessed need for housing”*.
- 4.48 Page 17 provides the Council’s assessment of the challenges to housing delivery in the District. A number of recurring themes emerge from the challenges identified with the most prominent being a shortage of sites and challenges around site assembly and suitability. In addition, low values and the cost of finance present obstacles to viability along with labour availability and skills.

Conclusions on the Development Plan and Corporate Documents

- 4.49 The need for affordable housing in Staffordshire Moorlands is clearly identified as a central issue in the District by the Local Plan and a range of other strategy and policy documents.
- 4.50 They highlight a clear link between the District’s economic trajectory and housing affordability. Insufficient and unaffordable housing is identified as contributing towards a shrinking working age population.
- 4.51 This represents a central theme running through the Development Plan and the Council’s corporate documents. Regeneration and economic growth for the District are limited by the lack of housing and specifically affordable housing which has contributed towards outward migration by younger residents.
- 4.52 There is clear recognition by the Council of need for housing delivery – and particularly affordable housing delivery – to be increased along with the potential consequences of not doing so.

Affordable Housing Needs

Section 5

5.1 Staffordshire Moorlands District Council has published two assessments of affordable housing need as part of its evidence base for the adopted Local Plan:

- a. Staffordshire Moorlands Strategic Housing Market Assessment and Housing Needs Study (June 2014) (the “SHMA 2014”); and the
- b. Staffordshire Moorlands Strategic Housing Market Assessment Update 2017 (February 2017) (the “SHMA Update 2017”)

5.2 In this Proof of Evidence, I focus upon the SHMA Update 2017 as it is the more recent assessment and is referred to directly within the adopted Local Plan. It should be noted that both assessments predate the expanded definition of affordable housing introduced in the NPPF 2018. Therefore neither account for the complete range of affordable housing need that falls within the current definition of affordable housing set out in the NPPF 2024.

Staffordshire Moorlands Strategic Housing Market Assessment Update 2017 (CD 11.7)

5.3 The Staffordshire Moorlands Strategic Housing Market Assessment Update 2017 was published in February 2017 and covers the 17-year period between 2014 and 2031.

5.4 The calculation of affordable housing need is set out at Section 6 of the SHMA Update 2017. This follows the basic needs model set out in the PPG, which accounts for the estimated current housing need; the newly-arising need over the assessment period; and the supply of re-lets and re-sales from existing stock which can be deducted from the gross need to arrive at a net annual affordable housing need figure.

5.5 Table 6.14 at page 81 provides a summary of the assessment. It identifies a net affordable housing need of **between 224 and 432 dwellings per annum over the 17-year period between 2014 and 2031.**

- 5.6 The difference between the two figures depends on the affordability assumptions used. The lower figure of 224dpa is reached by increasing the ‘affordability threshold’³ from 25% to 35% and assumes a 20% deposit is available to support the purchase of a property – in simple terms, it is a more stringent assessment.
- 5.7 The following paragraphs discuss the housing need figures in more detail, with paragraph 6.69 at page 82 noting that *“it is clear that under either of the two main scenarios highlighted above, there is a high level of affordable housing need in Staffordshire Moorlands”*. Paragraph 6.70 explains that on a strict interpretation of the PPG and former CLG guidance, the higher figure of 432 dwellings per annum represents a *“more policy compliant figure”* in the view of the SHMA’s authors.
- 5.8 Section 8 sets out the SHMA Update 2017’s conclusions and recommendations for policy-making. Paragraphs 8.14 to 8.16 at page 108 explain that it would not be realistic to meet the affordable housing need in full, but given the scale of need it remains important to address the supply of affordable housing:

“8.14 Based on these figures, Staffordshire Moorlands would need to provide at least 75% of its total annual housing requirement to comprise affordable housing if it is to meet all of its need even under the most favourable assumptions [i.e. the 224dpa figure]. This is neither achievable nor realistic.

8.15 The above calculations produce a result below the 707 dpa affordable housing need suggested by the District’s previous 2014 SHMA, primarily due to a significant fall in the number of people currently on the District’s Housing Register. Even so, both figures are well beyond what can realistically be achieved in terms of delivery.

8.16 Ultimately, the affordable housing target to be established by SMDC is a decision to be made through the emerging Local Plan. The Council will need to establish a balance between housing need requirements and viability of delivery. This study has demonstrated that the quantitative need for affordable housing in Staffordshire Moorlands is considerable. In particular, affordability and the supply of both market and affordable housing must be tackled to prevent the problem from becoming more acute.” (my emphasis)

³ i.e. the amount that a household is able to spend on its housing costs and remain ‘affordable’. A higher threshold means a household can spend more on its housing, but leaves less residual income to cover other day-to-day costs.

Summary

- 5.9 There is a pressing need for affordable housing in Staffordshire Moorlands. Most recently the SHMA Update 2017 identified a need for **between 224 and 432 affordable dwellings per annum over the 17-year period between 2014 and 2031** depending upon the assumptions taken forward in the calculations.
- 5.10 It is notable that the SHMA Update 2017 states the level of affordable housing need is *“well beyond what can realistically be achieved in terms of delivery”*.
- 5.11 Further, the SHMA Update 2017 is now seven years old, predates the current definition of affordable housing. In this context there is a real prospect of the level of affordable housing need being higher than that identified by the aging evidence base.

Affordable Housing Delivery

Section 6

- 6.1 This section reviews the past record of affordable housing delivery in Staffordshire Moorlands between the start of the Local Plan period in 2014/15 and 2023/24. The section also assesses affordable housing delivery against the needs identified in the SHMA Update 2017.
- 6.2 My analysis in this section is based on open data published by MHCLG, which accounts for new-build affordable housing completions as well as existing private-sector dwellings that have been purchased for use as affordable housing.

Affordable Housing Delivery in Staffordshire Moorlands

- 6.3 Figure 6.1 illustrates the gross delivery of affordable housing in Staffordshire Moorlands since the start of the Local Plan period in 2014/15.

Figure 6.1: Gross Additions to Affordable Housing Stock, 2014/15 to 2023/24

Monitoring Year	Net Overall Housing Completions	Gross Affordable Housing Completions	Proportion of Affordable Housing
2014/15	251	225	90%
2015/16	72	19	26%
2016/17	101	2	2%
2017/18	115	36	31%
2018/19	141	35	25%
2019/20	185	16	9%
2020/21	182	21	12%
2021/22	175	20	11%
2022/23	244	48	20%
2023/24	237	37	16%
Total	1,703	459	27%
Average per annum	170	46	27%

Source: MHCLG Open Data

- 6.4 Figure 6.1 shows that on average over the Local Plan period between 2014/15 and 2023/24, Staffordshire Moorlands has added **46 gross affordable dwellings per annum**, equivalent to **27% of the net number of housing completions**.

- 6.5 The above figures include the effect of one strong year of affordable housing delivery in 2014/15, in which 225 affordable dwellings were completed, equivalent to 90% of total housing completions that year. **2014/15 alone accounts for 49% of the gross affordable housing delivery** over the Local Plan period to date.
- 6.6 The high number of affordable housing completions in 2014/15 can be attributed to the ‘Ascent’ joint venture between the Council and Your Housing Group (“YHG”). Section 14 at page 20 of the Housing Implementation Strategy 2019 (**CD 11.6**) explains that Ascent was formed in 2009 to develop sites already owned by either the Council or YHG, supported by £8million of external grant funding from Homes England. The joint venture’s development programme was largely completed by 2014/15, and the high level of completions that year is not representative of the context for affordable housing delivery since then.
- 6.7 I note that if the impact of affordable housing development in 2014/15 is excluded, the Council has delivered an average of **just 26 gross affordable dwellings per annum over the nine years between 2015/16 and 2023/24⁴** which is equivalent to just **16% of overall completions**.

The impact of the Right to Buy

- 6.8 The affordable housing completions figures above are gross figures and does not take account of any losses from the affordable housing stock through the Right to Buy.
- 6.9 At a national level over two million households have exercised their Right to Buy since it was introduced in 1980. In her WMS of 30 July 2024 (**CD 6.4**), the incoming Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:

“Over the last five years, there has been an average of 9,000 council Right to Buy sales annually, but only 5,000 replacements each year. Right to Buy provides an important route for council tenants to be able to buy their own home. But the discounts have escalated in recent years and councils have been unable to replace the homes they need to move families out of temporary accommodation.”

- 6.10 Ongoing losses of dwellings from the affordable housing stock through Right to Buy sales are putting increasing pressure on the availability of affordable housing stock, underlining the need to deliver more affordable homes in Staffordshire Moorlands.

⁴ 234 affordable dwellings completed 2015/16 to 2023/24 ÷ 9 years = 26 affordable dwellings per annum.

- 6.11 Staffordshire Moorlands District Council transferred its affordable housing stock in 2001 and the affordable housing stock in the District is held by Registered Providers.
- 6.12 It should also be noted that local authorities can use receipts from Right to Buy sales to acquire existing dwellings for use as affordable housing or to fund new-build affordable housing. These acquisitions and completions are captured through the MHCLG gross affordable housing completions figures above.
- 6.13 Figure 6.2 below sets out the recorded Right to Buy sales for Staffordshire Moorlands since the start of the Local Plan period in 2014/15.

Figure 6.2: Right to Buy Sales in Staffordshire Moorlands, 2014/15 to 2023/24

Monitoring Year	Gross Affordable Housing Completions	Right to Buy sales from Registered Provider stock	Net Affordable Housing Additions
2014/15	225	-9	216
2015/16	19	-8	11
2016/17	2	-17	-15
2017/18	36	-19	17
2018/19	35	-13	22
2019/20	16	-21	-5
2020/21	21	-11	10
2021/22	20	-15	5
2022/23	48	-12	36
2023/24	37	-7	30
Total	459	-132	327
Average per annum	46	-13	33

Source: MHCLG Open Data

- 6.14 On average, 13 affordable dwellings have been lost from the affordable housing stock each year between 2014/15 and 2023/24. This represents 29% of the average rate of 46 gross affordable housing completions per annum in Staffordshire Moorlands over the same period. Put another way, the equivalent of over one-in-four affordable homes completed is lost through the Right to Buy.
- 6.15 Figure 6.3 below recalculates the affordable housing delivery per annum since the start of the Local Plan period in 2014/15, net of Right to Buy losses and acquisitions. When these are taken into account, the Council is delivering an average of just 19% net affordable housing delivery as a proportion of net completions (down from 27% gross).

Figure 6.3: Net Additions to Affordable Housing Stock 2014/15 to 2023/24

Monitoring Year	Net Overall Housing Completions	Net Affordable Housing Additions	Proportion of Affordable Housing
2014/15	251	216	86%
2015/16	72	11	15%
2016/17	101	-15	-15%
2017/18	115	17	15%
2018/19	141	22	16%
2019/20	185	-5	-3%
2020/21	182	10	5%
2021/22	175	5	3%
2022/23	244	36	15%
2023/24	237	30	13%
Total	1,703	327	19%
Average per annum	170	33	19%

Source: Refer to Figures 6.1 and 6.2

- 6.16 These figures show that the Council has delivered an average of **33 net affordable housing additions per annum** over the Local Plan period between 2014/15 and 2023/24. The impact of Right to Buy losses is clear: these losses are eroding the affordable housing stock to a significant degree. As a percentage of total housing completions gross affordable housing completions account of 29% of the total; however, **net affordable housing additions fall to just 19% of total completions.**

Affordable housing delivery against identified needs

SHMA Update 2017

- 6.17 As set out in Section 5 of this Proof of Evidence, the SHMA Update 2017 identifies an affordable housing need of **between 224 and 432 affordable dwellings per annum** over the 17 years between 2014/15 and 2031/32.

Upper Affordable Housing Need Figure – 432 Dwellings per Annum

- 6.18 Figure 6.5 overleaf presents the net affordable housing additions against the upper of the need figures identified in the SHMA Update 2017 (i.e. 432 affordable dwellings per annum) on an annualised basis.

Figure 6.5: Net Affordable Housing Additions Compared to the Upper Identified Need, SHMA Update 2017

Monitoring Year	SHMA 2017 Upper Affordable Housing Need	Net Affordable Housing Additions	Annual Shortfall	Cumulative Shortfall	Percentage of Need Met
2014/15	432	216	-216	-216	50%
2015/16	432	11	-421	-637	3%
2016/17	432	-15	-447	-1,084	-3%
2017/18	432	17	-415	-1,499	4%
2018/19	432	22	-410	-1,909	5%
2019/20	432	-5	-437	-2,346	-1%
2020/21	432	10	-422	-2,768	2%
2021/22	432	5	-427	-3,195	1%
2022/23	432	36	-396	-3,591	8%
2023/24	432	30	-402	-3,993	7%
Total	4,320	327	-3,993	-3,993	8%
Average	432	33	-399	n/a	8%

Source: Refer to Figure 6.2 and SHMA Update 2017

- 6.19 Figure 6.5 shows that against the upper identified need of 4,320 affordable dwellings between 2014/15 and 2023/24, the Council has achieved just 327 net additional affordable dwellings. **This is a numerical shortfall of -3,993 dwellings and the Council has met only 8% of the identified need.**

Lower Affordable Housing Need Figure – 224 Dwellings per Annum

- 6.20 Figure 6.6 overleaf presents the net affordable housing additions against the lower of the need figures identified in the SHMA Update 2017 (i.e. 224 affordable dwellings per annum) on an annualised basis.

Figure 6.6: Net Affordable Housing Additions Compared to the Lower Identified Need, SHMA Update 2017

Monitoring Year	SHMA 2017 Lower Affordable Housing Need	Net Affordable Housing Additions	Annual Shortfall	Cumulative Shortfall	Percentage of Need Met
2014/15	224	216	-8	-8	96%
2015/16	224	11	-213	-221	5%
2016/17	224	-15	-239	-460	-7%
2017/18	224	17	-207	-667	8%
2018/19	224	22	-202	-869	10%
2019/20	224	-5	-229	-1,098	-2%
2020/21	224	10	-214	-1,312	4%
2021/22	224	5	-219	-1,531	2%
2022/23	224	36	-188	-1,719	16%
2023/24	224	30	-194	-1,913	13%
Total	2,240	327	-1,913	-1,913	15%
Average	224	33	-191	n/a	15%

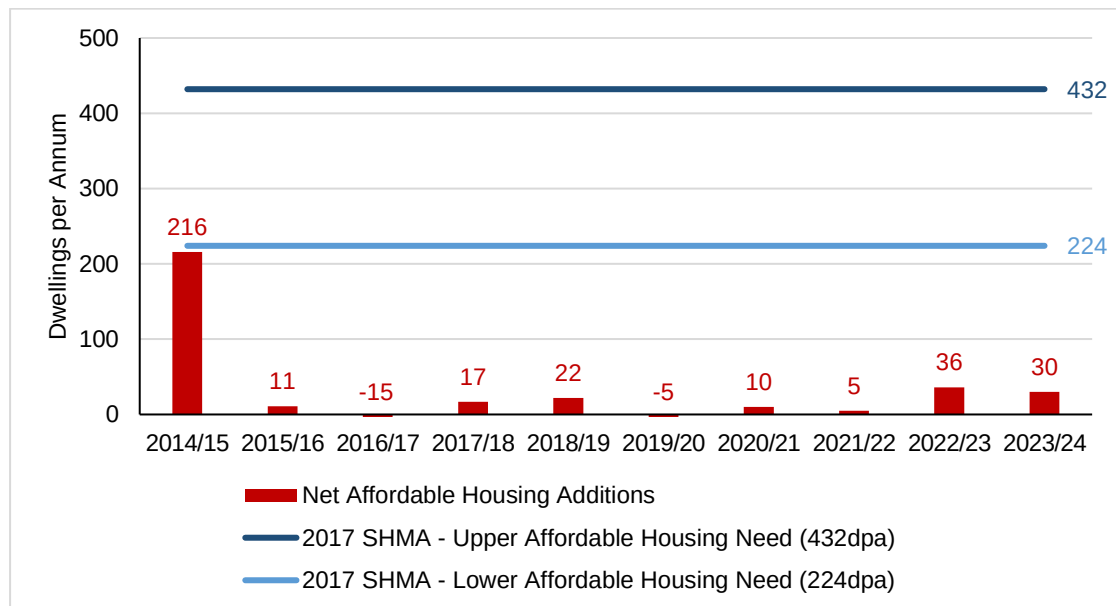
Source: Refer to Figure 6.2 and SHMA Update 2017

- 6.21 Figure 6.6 shows that against the lower identified need of 2,240 affordable dwellings between 2014/15 and 2023/24, the Council has achieved just 327 net additional affordable dwellings. **This is a numerical shortfall of -1,913 dwellings and the Council has met only 15% of even this lower level of identified need.**

Conclusions on Affordable Housing Delivery in Staffordshire Moorlands

- 6.22 There is an acute need for affordable housing in Staffordshire Moorlands which is not being met; a situation exacerbated by the Right to Buy, which is resulting in an average of more than one in every four completed dwellings being lost. Once Right to Buy sales are taken into account, the Council has delivered just 19% of its overall housing as affordable housing during the Local Plan period between 2014/15 and 2023/24.
- 6.23 The most recent assessment of affordable housing need, the SHMA Update 2017, identified a need for between 224 and 432 affordable dwellings per annum over the 17-year period between 2014 and 2031. Against the upper figure in this range, a shortfall of 3,993 affordable homes has arisen between 2014/15 and 2023/24. Even against the lower figure in this range, a shortfall of 1,913 affordable homes has arisen over the same period. The gulf between net affordable housing additions and the identified need is further illustrated in Figure 6.7 overleaf.

Figure 6.7: Net Affordable Housing Additions compared to SHMA Update 2017 Identified Needs



Source: Refer to Figures 6.5 and 6.6

- 6.24 Strikingly, in the entire decade since 2014/15, the Council's total net affordable housing delivery of 327 dwellings has been less than a single year's worth of the upper annual need figure of 432 dwellings per annum.
- 6.25 I acknowledge that the Local Plan does not seek to meet the identified affordable housing need in full, as discussed in Sections 4 and 5 of this Proof of Evidence. Nonetheless, the Local Plan does include an uplift to its overall housing requirement to better meet the affordable housing need, and its monitoring framework expected the *"Increased provision of affordable housing in accordance with policy"*.
- 6.26 Unfortunately, there is little sign of increasing provision here. In the context of a Local Plan with an overall housing requirement of 320 dwellings per annum, and an affordable housing policy that seeks 33% provision on qualifying sites, it is surprising to see an average delivery rate of just 26 gross affordable dwellings per annum at a rate of 16% of overall completions over the last 9 years⁵. In numerical terms too, delivery is low, not exceeding 36 net affordable dwellings per annum in the last 9 years. **It is clear that there is a substantial and chronic undersupply of affordable housing in Staffordshire Moorlands.**

⁵ As set out at paragraph 6.7 this excludes the impact of affordable housing development in the first year of the Plan period, 2014/15, which has not been repeated in subsequent years.

The Future Supply of Affordable Housing

Section 7

Introduction

- 7.1 This section of the evidence considers the future supply of affordable housing across Staffordshire Moorlands in comparison with identified needs.

Addressing the Shortfall in Affordable Housing Delivery

- 7.2 As discussed in sections 5 and 6 above, the SHMA Update 2017 identifies a need for between 224 and 432 affordable dwellings per annum between 2014/15 and 2030/31. Over this period, the Council has overseen the delivery of just 327 net affordable dwellings, resulting in shortfalls of between -1,913 dwellings against the lower end of this range, and -3,993 dwellings against the upper end of this range.
- 7.3 Evidently, a step change in affordable housing delivery is needed now, if the Council is to make meaningful progress in reducing, or even reversing, these shortfalls.
- 7.4 The critical importance of understanding the ability of the Council to meet future needs was considered in a recent appeal at Sondes Place Farm, Dorking where Tetlow King Planning provided affordable housing evidence.
- 7.5 The Inspector accepted the findings of the ‘future supply of affordable housing’ evidence and endorsed the use of the Sedgefield approach to clear a previous backlog of affordable housing delivery (**CD 12.31**, page 16, paragraphs 85 and 86):

“Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.

To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to be substantially below that level of delivery. This will mean the existing shortfall will only become worse.” (my emphasis).

- 7.6 The Inspector went on to outline the consequences of not providing sufficient affordable housing (paragraph 88):

“The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”

- 7.7 I acknowledge that the Local Plan does not seek to address overall housing needs over the same five year timeframe as set out within the ‘Sedgefield’ approach. However, affordable housing need relates to those households experiencing hardship through inadequate or costly housing and I consider it is important that backlog needs should be addressed as soon as possible.

The Future Supply of Affordable Housing

Council’s Position

- 7.8 The Council has published its latest Five-Year Housing Land Supply Statement (“5YHLS”) in November 2023 (**CD 7.1**), covering the period 1 April 2023 to 31 March 2028 (notwithstanding that completions for the first year of 2023/24 are already known). It indicates that the Council has an overall deliverable supply of 1,651 dwellings over the period.
- 7.9 When *generously* assuming that all 1,651 dwellings included in the Council’s 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (i.e. 33%) as a proportion of overall housing completions, this is likely to deliver 545 affordable dwellings over the period⁶, equating to **109 gross affordable dwellings per annum**⁷.
- 7.10 This is a gross figure and does not take account of Right to Buy sales, which have averaged -13 dwellings per annum over the Local Plan period. Once these sales are deducted, there is a likely supply of **96 net affordable dwellings per annum**.

⁶ 1,651 dwellings in the supply @ 33% = 544.83 dwellings (rounded to 545).

⁷ 545 dwellings ÷ 5 years = 108.96 dwellings (rounded to 109).

- 7.11 Figure 7.1 below compares this potential net future affordable housing delivery of 96 dwellings per annum against the upper need figure of 432 affordable dwellings per annum as set out in the SHMA Update 2017.

Figure 7.1: Projected Net Affordable Housing Additions compared to SHMA Update 2017 Identified Needs – Council's 5YHLS Position

Monitoring Year	2017 SHMA Upper Affordable Housing Need	Net Affordable Housing Additions		Annual Shortfall	Cumulative Shortfall	Percentage of Need Met
		Actual	Projected			
2014/15	432	216	-	-216	-216	50%
2015/16	432	11	-	-421	-637	3%
2016/17	432	-15	-	-447	-1,084	-3%
2017/18	432	17	-	-415	-1,499	4%
2018/19	432	22	-	-410	-1,909	5%
2019/20	432	-5	-	-437	-2,346	-1%
2020/21	432	10	-	-422	-2,768	2%
2021/22	432	5	-	-427	-3,195	1%
2022/23	432	36	-	-396	-3,591	8%
2023/24	432	-	96	-336	-3,927	22%
2024/25	432	-	96	-336	-4,263	22%
2025/26	432	-	96	-336	-4,599	22%
2026/27	432	-	96	-336	-4,935	22%
2027/28	432	-	96	-336	-5,271	22%
Total	6,048	297	480	-5,271	-5,271	13%

Source: Refer to Figure 6.5 above

- 7.12 As Figure 7.1 shows, the existing shortfall, which had reached -3,591 affordable dwellings by the end of 2022/23, will continue to widen over the next five years, reaching -5,271 affordable dwellings by the end of 2027/28.

Appellant's Position

- 7.13 It is the Appellant's position, set out in the evidence of Mr Ben Pycroft, that the Council has an overall deliverable supply of 1,242 dwellings over the period.
- 7.14 When *generously* assuming that all 1,242 dwellings included in the Appellant's 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (i.e. 33%) as a proportion

of overall housing completions, this is likely to deliver only 410 affordable dwellings over the period⁸, equating to just **82 new affordable dwellings per annum**⁹.

7.15 As with the calculations for the Council's position above, this is a gross figure and does not take account of Right to Buy sales, which have averaged -13 dwellings per annum over the Local Plan period. Once these sales are deducted, there is a likely supply of **69 net affordable dwellings per annum**.

7.16 Figure 7.2 below replicates the exercise above and compares this potential net future affordable housing delivery of 69 dwellings per annum against the upper need figure of 432 affordable dwellings per annum as set out in the SHMA Update 2017.

Figure 7.2: Projected Net Affordable Housing Additions compared to SHMA Update 2017 Identified Needs – Appellant's 5YHLS Position

Monitoring Year	2017 SHMA Upper Affordable Housing Need	Net Affordable Housing Additions		Annual Shortfall	Cumulative Shortfall	Percentage of Need Met
		Actual	Projected			
2014/15	432	216	-	-216	-216	50%
2015/16	432	11	-	-421	-637	3%
2016/17	432	-15	-	-447	-1,084	-3%
2017/18	432	17	-	-415	-1,499	4%
2018/19	432	22	-	-410	-1,909	5%
2019/20	432	-5	-	-437	-2,346	-1%
2020/21	432	10	-	-422	-2,768	2%
2021/22	432	5	-	-427	-3,195	1%
2022/23	432	36	-	-396	-3,591	8%
2023/24	432	-	69	-363	-3,954	16%
2024/25	432	-	69	-363	-4,317	16%
2025/26	432	-	69	-363	-4,680	16%
2026/27	432	-	69	-363	-5,043	16%
2027/28	432	-	69	-363	-5,406	16%
Total	6,048	297	345	-5,406	-5,406	11%

Source: Refer to Figure 6.5 above

7.17 As Figure 7.1 shows, the existing shortfall, which had reached -3,591 affordable dwellings by the end of 2022/23, will continue to widen over the next five years,

⁸ 1,242 dwellings in the supply @ 33% = 409.86 dwellings (rounded to 410).

⁹ 410 dwellings ÷ 5 years = 82 dwellings.

reaching -5,406 affordable dwellings by the end of 2027/28 based upon the Appellant's housing land supply evidence.

Summary and Conclusions

- 7.18 The above evidence demonstrates that there is no realistic prospect of the Council being able to meet its affordable housing needs over the next five years relying on its identified future housing supply. Generously assuming all sites in the in the 5YHLS would provide policy compliant levels of affordable housing there is a possible supply of just **96 net affordable dwellings per annum based upon the Council's own housing land supply position**, or just **69 net affordable dwellings per annum based upon the Appellant's housing land supply position**. This will result in ever widening shortfalls by the end of 2027/28 of -5,271 dwellings against the needs identified in the SHMA Update 2017 based upon the Council's 5YHLS, and an even greater shortfall of -5,406 dwellings based upon the Appellant's 5YHLS.
- 7.19 The prospect of the addressing existing backlog appears remote – yet these identified needs relate to those households with a real housing need which is going unmet. This makes it even more important that suitable sites, such as the appeal site, are granted planning permission now in order to boost the supply of affordable housing. The scale of unmet need means that I am confident that **every one of the (up to) 71 affordable dwellings proposed will accommodate a household in need**.

Affordability Indicators

Section 8

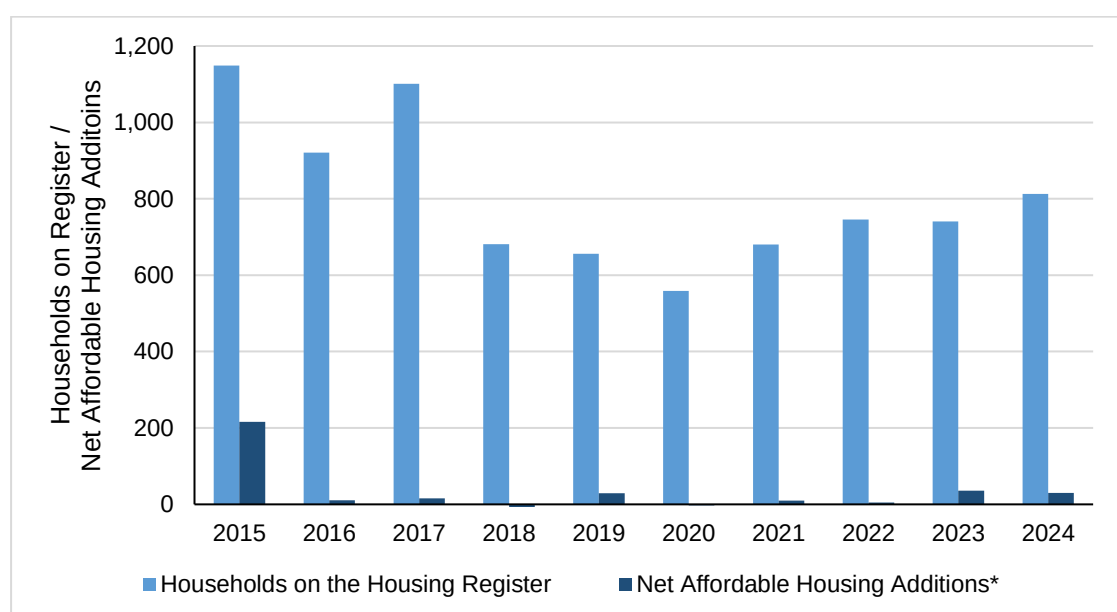
Introduction

- 8.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge this is in the context of plan making.

Housing Register

- 8.2 The Council's Freedom of Information ("Fol") response (**Appendix JRO1**) confirms that on 31 March 2024 there were **813 households on the Housing Register**. This represents a 10% increase in a single year from 741 households on 31 March 2023, as set out in MHCLG data. It also represents a 45% increase in the five years since 2020 when the housing register stood at 559 households.
- 8.3 Figure 8.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Staffordshire Moorlands since the start of the Local Plan period in 2014/15.

Figure 8.1: Number of Households on the Housing Register Compared with Net Additions to Affordable Housing Stock, 2014/15 to 2023/24



Source: MHCLG Open Data and Fol response November 2024. * Negative net additions are not shown on this chart

8.4 As Figure 8.1 clearly illustrates, affordable housing delivery has failed to keep pace with the Housing Register by a very considerable margin for every single year in Staffordshire Moorlands since 2014/15.

8.5 Footnote 3 of MHCLG Live Table 600 highlights that:

“The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, has contributed to a rise in the size of waiting lists. The Localism Act 2011 has contributed to a decrease in the size of waiting lists, as it allowed local authorities to set their own qualification criteria. Since households can be on the waiting list of more than one local authority, there is the potential for double counting.”

8.6 Evidently the result of the Localism Act is that many local authorities, including Staffordshire Moorlands, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

8.7 Following the changes brought about by the Localism Act, Staffordshire Moorlands published a revised Housing Allocations Scheme which received further revisions in June 2016 and October 2020.

8.8 Despite this it is important to reiterate that the number of households on the Housing Register has increased by 10% in the past 12 months, and by 45% in the past five years, meaning there is rising pressure upon the affordable housing stock across Staffordshire Moorlands.

8.9 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.

8.10 The relevance of the Housing Register is underlined in the findings of the appeal at Oxford Brookes University Campus at Wheatley, (CD 12.32, page 74, paragraph 13.101) where the Inspector asserted that in the context of a lengthy housing register of 2,421 households:

“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses” (my emphasis).

8.11 The Inspector went on to state at paragraph 13.102 that:

“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list”.

8.12 Before concluding that:

“Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”.

8.13 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

“The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”.

8.14 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery.

8.15 It is important to note that the Housing Register is only part of the equation relating to housing need. The Housing Register does not constitute the complete definition of affordable housing need as set out in the current NPPF glossary definitions at Annex 2 i.e. social rent; affordable housing for rent; discount market sale; and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

8.16 In short, there remains a group of households who fall within the gap of not being eligible to enter the Housing Register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the several recent iterations of the NPPF. Furthermore, as previously raised the wider definition of affordable housing is not reflected in the SHMA Update 2017.

Waiting Times for Housing

- 8.17 The Council's FoI response (**Appendix JRO1**) shows that successful applicants for affordable housing face lengthy waits for an affordable home in Staffordshire Moorlands.
- 8.18 Figure 8.2 illustrates that, based on the dwelling size, successful applicants in the 2023/24 period experienced average waiting times ranging **from 446 days** (approximately one year and two months) **to 707 days** (almost two years) for an affordable home.

Figure 8.2: Housing Register Average Waiting Times, March 2024

Size of Affordable Property	Average Waiting Time to be Housed (31 March 2024)
1-bedroom home	446
2-bedroom home	496
3-bedroom home	530
4+ bedroom home	707

Source: FoI response November 2024

- 8.19 It is crucial to note that these figures are averages, implying that some households may have been waiting even longer than the indicated times. Additionally, these statistics only capture the waiting times for successful applicants, typically those in the highest priority need. Households with less urgent needs can anticipate significantly lengthier waiting periods.

Housing Register Bids and Lettings

- 8.20 The Council's FoI response (**Appendix JRO1**) confirms that as of 31 March 2024, there were **136 households who have expressed a preference for an affordable home in Cheadle Parish**, and 6 households who specified a preference in Kingsley Parish. This represents 17% of the total Housing Register of 813 households.
- 8.21 Figure 8.3 below demonstrates average number of bids per property in the Kingsley and Cheadle parishes over the 2023/24 monitoring period for a range of types of affordable property.

Figure 8.3: Bids Per Property in the parishes of Kingsley and Cheadle, April 2023 to March 2024

Type of Affordable Property	Kingsley Parish		Cheadle Parish	
	Number of Properties Advertised	Average Bids Per Property	Number of Properties Advertised	Average Bids Per Property
1-bed affordable dwelling	2	15.5	14	31.6
2-bed affordable dwelling	0	n/a	16	29.5
3-bed affordable dwelling	1	34	6	42.3
4+ bed affordable dwelling	0	n/a	0	n/a

Source: Fol response November 2024

- 8.22 Figure 8.3 demonstrates that between 1 April 2023 to 31 March 2024 there were an average of 15.5 bids per 1-bed affordable dwelling put up for let in the Kingsley Parish, and 34 average bids per 3-bed affordable dwelling. Notably there were no 2-bed or 4+ bed properties advertised.
- 8.23 Figure 8.3 also demonstrates that between 1 April 2023 to 31 March 2024 there were an average of 31.6 bids per 1-bed affordable dwelling put up for let in the Cheadle Parish, 29.5 bids per 1-bed affordable dwellings, 42.3 bids per 3-bed affordable dwelling. Notably there were no 4+ bed properties advertised.
- 8.24 This should be viewed in context of the fact that the Figure 8.4 also highlights that over the 2023/24 monitoring period there were **just 3 social housing lettings in Kingsley Civil Parish and 36 in Cheadle Civil Parish**.

Figure 8.4: Number of social housing lettings in the parishes of Kingsley and Cheadle, April 2023 to March 2024

Location	Social Housing Lettings	
	1 April 2022 to 31 March 2023	1 April 2023 to 31 March 2024
Kingsley Civil Parish	5	3
Cheadle Civil Parish	41	36

Source: Fol response November 2024

- 8.25 For every successful letting, there are clearly many other households who have missed out and are left waiting for an affordable home. Evidently, there is a clear and pressing need for affordable homes within the parishes which is not being met.

Temporary Accommodation

- 8.26 The Council's updated FoI response of 23 December 2024 (**Appendix JRO1**) explains that during the year to 31 March 2024 there were **70 households housed in temporary accommodation** by the Council, of which **51 were housed outside the District**.
- 8.27 This represents a small decline in the overall number of households in temporary accommodation from the previous year to 31 March 2023 where there were 72 households. However, the number housed outside the District increased from 47 households in 2023 to 51 households in 2024, which accounts for 73% of the households in temporary accommodation in 2024.
- 8.28 MHCLG statutory homelessness data identifies that on 31 March 2023 there were 14 households in temporary accommodation including 5 households (36%) with children. This data represents a 'snapshot' in time on that day.
- 8.29 Not only does the above mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network, at significant cost to local taxpayers.
- 8.30 The Council's updated FoI response states that **Staffordshire Moorlands District Council spent £129,456 on temporary accommodation** between 1 April 2023 and 31 March 2024, a 77% increase from the previous year where the figure stood at £73,226.
- 8.31 Page 17 of the Council's Homelessness and Rough Sleeping Strategy notes that temporary accommodation is an essential part of tackling homelessness but that shortages of appropriate temporary accommodation result in an over-reliance on bed-and-breakfasts. This is both costly and less conducive to achieving positive outcomes for those housed;
- "we need to ensure that we have a sufficient supply of temporary accommodation to meet demand, of the right type and in the right place. This will be essential to avoid the use of B&B."*
- 8.32 The *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* report published in August 2019 by the Children's Commissioner found that temporary accommodation presents serious risks to children's health, wellbeing, and safety,

particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.

- 8.33 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a “*significant impact on many aspects of their lives*”.

Homelessness

- 8.34 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 83 households with a homelessness prevention duty¹⁰, and a further 113 households with a relief duty¹¹ from the Council.
- 8.35 The Homelessness and Rough Sleeping Strategy notes that homelessness is expected to rise in the District in part due to the ‘*limited availability of social housing*’ (page 7) resulting in those struggling to manage a spiralling cost of living being faced with limited options.

“It is anticipated that people will find it increasingly difficult to meet their housing costs. Significantly higher numbers of households renting privately, socially and with mortgages are anticipated to approach the Council for housing and homelessness assistance.”

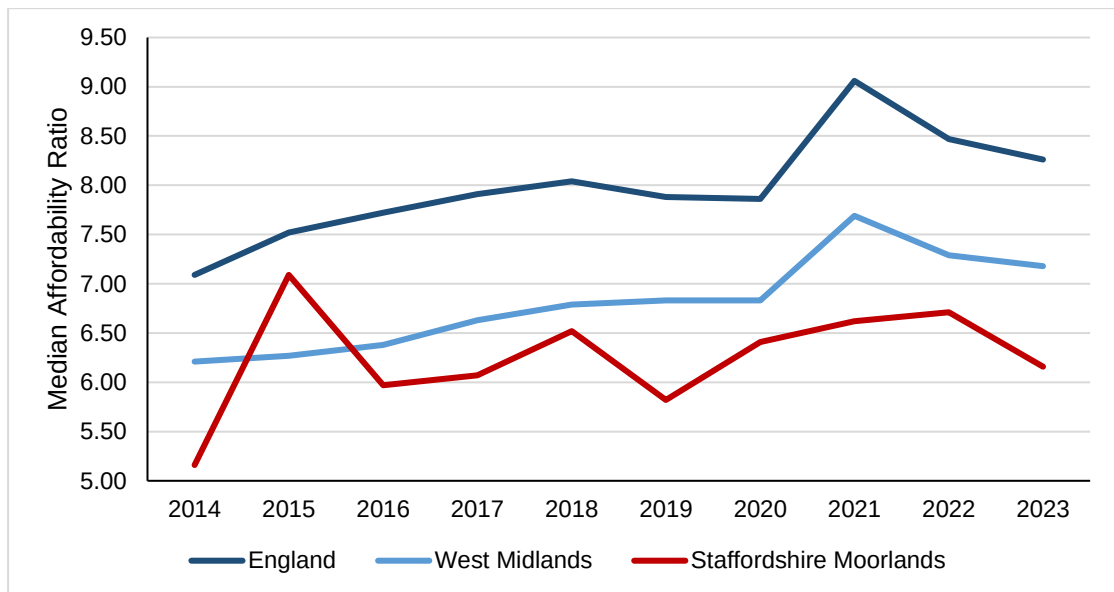
Median House Prices

- 8.36 The ratio of median house prices to median incomes in Staffordshire Moorlands now stands at **6.16**, a 19% increase since the start of the Local Plan period in 2014 where it stood at 5.16. A ratio of 6.16 is below the national median of 8.26 (-25%) and below the median for the West Midlands of 7.18 (-14%) – yet it is still some 37% higher than the typical ratio of 4.5 times earnings used for mortgage lending. This illustrates the difficulties in accessing a home on the open market in Staffordshire Moorlands, even if on face value, the affordability ratio is better than the national and regional averages.

¹⁰ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

¹¹ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

Figure 8.5: Median Workplace-Based Affordability Ratio, 2014 to 2023

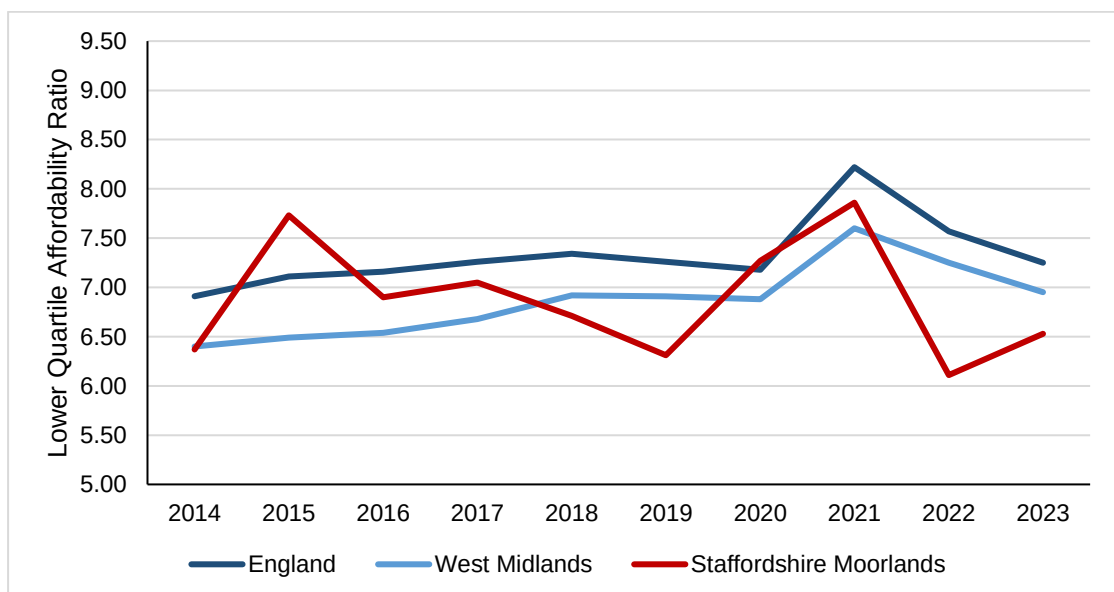


Source: ONS

Lower Quartile House Prices

- 8.37 For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to incomes in Staffordshire Moorlands in 2023 stood at **6.53**, a 3% increase since the start of the Local Plan period in 2014 when it stood at 6.37. The ratio in Staffordshire Moorlands stands below above the national average of 7.25 (-10%) and the West Midlands average of 6.95 (-6%) but these differences are less pronounced than at the median level.

Figure 8.6: Lower Quartile Workplace-Based Affordability Ratio, 2014 to 2023



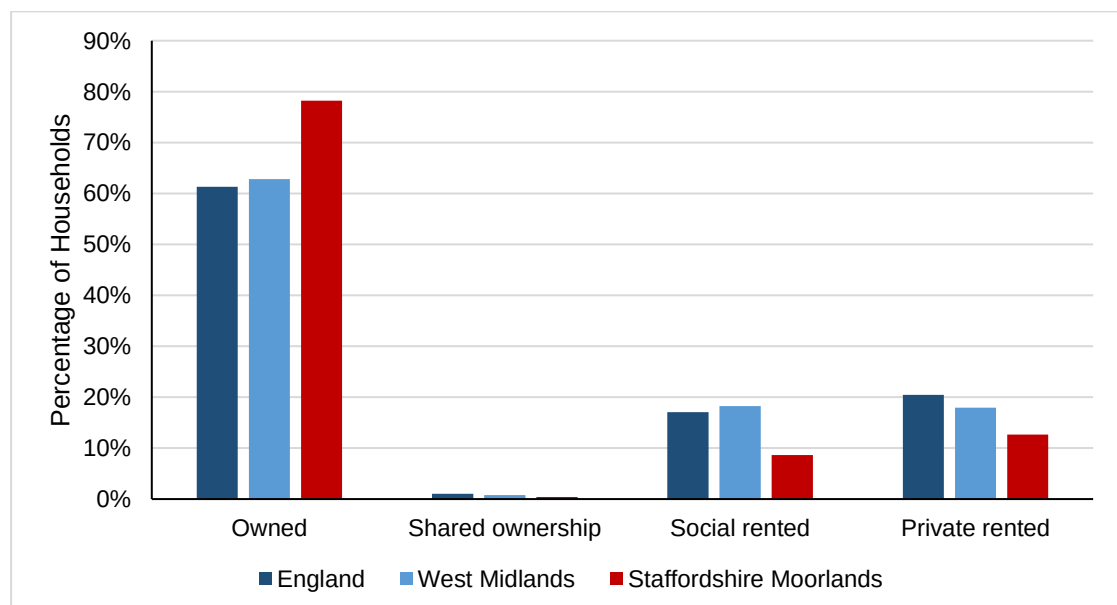
Source: ONS

- 8.38 This means that those on lower quartile incomes in Staffordshire Moorlands, seeking to purchase a lower quartile priced property, now need to find almost seven times their annual income to do so. The lower quartile affordability ratio is some 45% higher than the typical ratio of 4.5 times earnings used for mortgage lending. This is a greater disparity than at the median level of the market, indicating that there is more pressure at the 'entry level' of the housing market.

Tenure

- 8.39 Figure 8.7 below illustrates the tenure split in Staffordshire Moorlands, the West Midlands and in England, based upon data in the Census 2021. It reveals that the existing tenure mix in Staffordshire Moorlands is dominated by home ownership, accounting for 78% of households (compared with 61% in England and 63% in the West Midlands). Conversely, both private and social rented sectors are underrepresented in Staffordshire Moorlands, with 13% of households being in the private rented sector (compared with 20% in England and 18% in the West Midlands) and **just 9% of households being in the social rented sector (compared with 17% in England and 18% in the West Midlands).**
- 8.40 This means that for those households unable to access home ownership (for example, due to the large deposits needed, or the costs of servicing a mortgage), there are fewer rented options available in Staffordshire Moorlands. This is especially so for the social rented sector, illustrating a lack of affordable options in the existing housing stock.

Figure 8.7: Tenure, 2021



Source: Census 2021. Households 'living rent free' not illustrated as these account for <1% at all geographic levels

- 8.41 Strikingly, the Census 2021 data reveals that Staffordshire Moorlands has the 13th-smallest social rented sector (by proportion) of all 296 local authorities in England, and the smallest social rented sector in the West Midlands region.
- 8.42 The Council itself acknowledges that the small social rented sector affects its ability to accommodate households in need; the Homelessness and Rough Sleeping Strategy (CD 11.4) highlights the small stock as being one of the key challenges and drivers of homelessness in the District at pages 6 and 7.

Summary and Conclusions

- 8.43 As demonstrated through the analysis in this section, there are serious affordability challenges in Staffordshire Moorlands District, which is reflected in the significant pressure on the affordable housing stock in the Cheadle local area.
- 8.44 Section 4 of this evidence outlined the extent to which the disparity between the supply of affordable housing and the demand for it has been recognised by the Council, in a range of policy and strategy documents, a major challenge in the District. This challenge extends beyond the immediate impact on the lives of those unable to secure appropriate housing. It affects the economic prospects of the District as whole by limiting the ability of younger people and families to find homes with consequences for the size of the working age population. The Local Plan itself recognises this as a serious issue for the District.
- 8.45 If the pressure on the existing affordable housing stock is to be alleviated, it is clear that urgent action must be taken to deliver more affordable homes.

Council's Assessment of the Application

Section 9

Introduction

- 9.1 This section of the evidence considers the Council's assessment of the appeal proposals during the course of the application and the appeal process.

Committee Report

- 9.2 Despite an officer recommendation of approval, the application was refused by the Staffordshire Moorlands Planning Applications Committee on 28 March 2024 (**CD 4.2**), with the decision issued on 15 April 2024 (**CD 4.1**).
- 9.3 Section 6 at page 5 of the Committee Report summarises the public representations to the application. This includes six letters of support, which include the comments *"Support as long as the houses are good quality and affordable"* and *"Support for more social housing"*. In my experience it is relatively uncommon that members of the public write in support of development, so these letters provide welcome recognition of the importance of the proposed affordable housing.
- 9.4 The Committee Report addresses affordable housing on pages 33 and 34. Paragraph 7.30 of the Committee Report confirms that the scheme accords with affordable housing policy, noting that the affordable housing provision is *"in line with Policy H3"*. It goes on, in paragraph 7.31, to confirm that the approach to tenure mix *"can be secured in a section 106 agreement"*.
- 9.5 Paragraph 7.36 concludes *"Subject to these conditions and the prior completion of a 106 legal agreement to secure 33% affordable homes and 10 self-build/custom build units, there is compliance with policies H1 and H3 and the NPPF"*.
- 9.6 The planning balance is considered in paragraphs 8.1 to 8.11 (pages 47 to 49), with paragraph 8.6 at page 49 considering the weight to be ascribed to affordable housing in this context, describing this as *"substantial"*.

"8.6 In terms of the benefits first and foremost this proposal will deliver much needed housing in circumstances of a significant undersupply. The illustrative plan indicates that this could be approx. 215 houses. The Council's supply fell in 2023 to 3.58 years from 3.71 years in 2022. The scheme will also deliver

much needed affordable housing in the District, 33% of the total number of units. Government policy in the NPPF seeks to significantly boost the supply of housing. The provision of market and affordable housing is a social benefit of the scheme to which substantial weight is given” (emphasis mine).

- 9.7 It is important to note that the Committee Report does not consider the delivery of market and affordable housing separately but instead treats them as a single ‘*social benefit*’ instead of treating them as benefits to which separate weight should be given. This is not an approach to which I agree; to my mind, affordable housing and open market housing are addressing different and discrete elements of need and should be considered as distinct benefits in the planning balance. Section 11 of this Proof of Evidence demonstrates that affordable housing has been found to be separate and distinct benefit in numerous appeals.
- 9.8 In particular, the recent appeal decision in at Coombebury Cottage, Dunsfold (CD 12.33), paragraph 48 at page 8 explains that “*the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs*”. The benefits of the proposed affordable homes at the appeal site should be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.
- 9.9 In resolving to refuse the application three reasons for refusal were cited none of which expressly relate to the affordable housing provision proposed by the scheme.

Staffordshire Moorlands District Council Statement of Case

- 9.10 The Council submitted their Statement of Case (“SoC”) in respect of the appeal proposals to the Inspectorate in November 2024. It was prepared by Urban Imprint on behalf of the Council.
- 9.11 No reference is made to affordable housing in the Council’s SoC, but in relation to the planning balance the Council’s position remains that it is unable to demonstrate a five-year housing land supply and the tilted balance under paragraph 11d of the NPPF applies, as the Site does not fall within any of the exceptions within footnote 9 which would preclude the tilted balance from being triggered.
- 9.12 Paragraph 4.15 notes there to be a “*lack of supply*” in relation to all forms of housing but no consideration is given the extent of the shortfall in affordable housing provision; no reference to the weight that housing generally or affordable housing specifically should carry. Paragraph 4.18 sets out the SoC’s conclusion on the planning balance.

“Therefore, the tilted balance in favour of new housing, whilst also considering the wider benefits of the proposal, are not sufficient to overcome this identified harm and the principle of the proposal is unacceptable due to landscape and heritage impact. The adverse impacts significantly and demonstrably outweigh the benefits and therefore the LPA consider that the appeal should be dismissed.”

Summary and Conclusions

- 9.13 I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve. While the Council’s Committee Report attaches substantial weight to the benefit of the proposed housing, it does not consider the affordable housing as a separate and discrete benefit in the planning balance.
- 9.14 The acute level of affordable housing need in Staffordshire Moorlands, coupled with a persistent lack of delivery and challenging affordability, will detrimentally affect the ability of people to lead the best lives they can.

The Benefits of the Proposed Affordable Housing

Section 10

Introduction

- 10.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 10.2 Section 2 of this evidence outlined the new Labour Government's stated aim of prioritising the delivery of affordable housing.
- 10.3 As set out in the Section 3 of this Proof of Evidence, there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. Staffordshire Moorlands is no exception to this.
- 10.4 The appeal scheme will provide **up to 71 affordable dwellings** or 33% of the 215 total dwellings to be provided.
- 10.5 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

Benefits of the proposed Affordable Housing at the appeal site

- 10.6 The offer meets the requirements of adopted Policy H3 (33%) of the Local Plan. It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 10.7 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD 12.34**) in September 2018 who was clear at paragraph 72 of their decision that:

"In the light of the Council's track record, the proposals' full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when

others have only achieved partial compliance, would be a considerable benefit”
(my emphasis).

- 10.8 Another appeal that considers the issue of benefits is the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at Hawkhurst in Kent (**CD 12.35**). In critiquing the Council’s views regarding the affordable housing benefits of the scheme, the Inspector made the following comments:

“The Council are of the view that the housing benefits of the scheme are ‘generic’ and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council’s acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts on the most vulnerable people in the borough, who are unlikely to describe their needs as generic.” (Paragraph 118)

- 10.9 I agree, the recipients of up to 71 affordable homes (33% of the up to 215 total homes) here will not describe their needs as generic.

- 10.10 The affordable housing benefits of the appeal scheme can be summarised as:

- a. Policy compliant offer of 33% (up to 71 dwellings) of the scheme provided as affordable housing;
- b. A deliverable scheme which provides much needed affordable homes;
- c. In a sustainable location;
- d. With the affordable homes managed by a Registered Provider;
- e. Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation when compared with the existing housing stock; and
- f. Greater security of tenure than the private rented sector.

- 10.11 In my opinion these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.

The Weight to be Attached to the Proposed Affordable Housing Provision

Section 11

Introduction

- 11.1 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 11.2 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 11.3 Market signals indicate a worsening trend in affordability across Staffordshire Moorlands, coupled with an increasing housing register and lengthy waits for an affordable home. Against a backdrop of a severe undersupply of affordable housing compared to need – and an already small social housing stock accounting for just 9% of homes here – urgent action must be taken to deliver more affordable homes in the District.
- 11.4 The proposed development will deliver much needed affordable housing and help to alleviate the acute identified shortfalls.

Affordable Housing Offer

- 11.5 The proposed development includes 33% on site affordable housing provision, which meets the requirements of Policy H3 of the Local Plan.
- 11.6 The tenure split will be agreed under a reserved matters submission but will reflect the requirements of Policy H3 of the Local Plan and the most recent iteration of the NPPF. The proposed affordable housing will be secured by way of a section 106 planning obligation.

Local Policy Position

- 11.7 The Development Plan for Staffordshire Moorlands in relation to affordable housing is the Staffordshire Moorland Local Plan 2014 to 2031 (September 2020). Policy H3 of the Local Plan requires the provision of 33% affordable housing on qualifying sites.

- 11.8 As this Proof of Evidence further explains, the adopted Development Plan along with a range of SPDs, supporting strategies, and the Council's corporate documents, all firmly identify affordable housing as a key issue in Staffordshire Moorlands and support its delivery. The Council's plans and corporate documents reveal the importance of providing sufficient housing, including affordable housing, to attract and retain those households of working age; and the challenges that the Council faces in housing people in need, including those facing homelessness.

National Policy

- 11.9 The NPPF is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 11.10 Paragraph 61 of the NPPF sets out the Government's clear objective of *"significantly boosting the supply of homes"* before explaining that *"The overall aim should be to meet an area's identified housing need"*.
- 11.11 Furthermore, paragraph 62 requires that *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance"* (my emphasis).
- 11.12 The NPPF requires local authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, *"including those who require affordable housing"*.

Affordable Housing Needs

- 11.13 Section 5 of this evidence identified a pressing need for affordable housing; the SHMA Update 2017 identified a need of between 224 to 432 affordable homes over the seventeen year period between 2014/15 and 2030/31.
- 11.14 Notably, paragraph 6.69 of the SHMA Update 2017 concludes that *"it is clear that under either of the two main scenarios highlighted above, there is a high level of affordable housing need in Staffordshire Moorlands"* (my emphasis).

Affordable Housing Delivery

- 11.15 Section 6 sets out that there is an acute and persistent under-delivery of affordable housing in Staffordshire Moorlands across the Local Plan period.

- 11.16 In the period between 2014/15 and 2023/24 a total of 1,703 dwellings were delivered in Staffordshire Moorlands, equivalent to 170 per annum. Of these, 459 gross dwellings were affordable tenures, equivalent to 46 per annum. This equates to 27% gross affordable housing delivery.
- 11.17 Notably, these figures include the effect of one strong year of affordable housing delivery in 2014/15, in which 225 affordable dwellings were completed. 2014/15 alone accounts for 49% of the gross affordable housing delivery over the Local Plan period to date.
- 11.18 This can be attributed to the 'Ascent' joint venture which developed new affordable housing assisted with Homes England grant funding; this joint venture is no longer delivering affordable housing and this high rate of delivery has not been replicated since. If the impact of affordable housing development in 2014/15 is excluded, the Council has delivered an average of just 26 gross affordable dwellings per annum over the nine years between 2015/16 and 2023/24, which is equivalent to just 16% of overall completions.
- 11.19 Accounting for the effect of the Right to Buy on average between 2014/15 and 2023/24, the Council has added just 327 affordable dwellings in total or 33 per annum, net of Right to Buy sales, equivalent to 19% of the total average number of net housing completions.
- 11.20 This level of net affordable housing delivery has resulted in a shortfall of 3,993 affordable dwellings against the needs identified in the 2017 SHMA for the period 2014/15 to 2023/24, or an average annual shortfall of 399 affordable homes over the period.

The Future Supply of Affordable Housing

- 11.21 The future supply of affordable housing will not meet identified needs going forward, and the existing shortfalls will continue to widen.
- 11.22 Generously assuming all sites in the in the Council's 5YHLS would provide policy compliant levels of affordable housing there is a possible supply of just **96 net affordable dwellings per annum based upon the Council's own housing land supply position**, or just **69 net affordable dwellings per annum based upon the Appellant's housing land supply position**. This will result in ever widening shortfalls by the end of 2027/28 of -5,271 dwellings against the needs identified in the SHMA Update 2017 based upon the Council's 5YHLS, and an even greater shortfall of -5,406 dwellings based upon the Appellant's 5YHLS.

Affordability

- 11.23 In addition to the persistent shortfall in affordable housing delivery against objectively assessed needs, other indicators further point to an affordability crisis in Staffordshire Moorlands. Set out below are the key findings in respect of affordability across the District:

Housing Register

- a. FoI data confirms that on 31 March 2024 there were 813 households on the Council's Housing Register.
- b. Successful applicants in the 2023/24 period experienced average waiting times ranging from 446 days (approximately one year and two months) to 707 days (almost two years) for an affordable home.

Temporary Accommodation

- c. During 2023/24 the Council accommodated 70 households in temporary accommodation, of whom 51 were housed outside of the District.

Homelessness

- d. In the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 83 households in need of homelessness prevention duty, and a further 113 households in need of relief duty from the Council.

House Prices

- e. The ratio of median house prices to median incomes in Staffordshire Moorlands now stands at 6.16, a 19% increase since the start of the Local Plan period in 2014 where it stood at 5.16.
- f. The ratio of lower quartile house price to incomes in Staffordshire Moorlands in 2023 stood at 6.53, a 3% increase since the start of the Local Plan period in 2014 when it stood at 6.37.

Tenure

- g. The tenure mix in Staffordshire Moorlands is imbalanced with just 9% of households being in the social rented sector, compared with 17% in England and 18% in the West Midlands.

- 11.24 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Staffordshire Moorlands.

- 11.25 This demonstrates an acute need for affordable housing in Staffordshire Moorlands and one which the Council and decision takers need to do as much as possible to address as required to do so, proactively, by the NPPF.

Relevant Secretary of State and Appeal Decisions

- 11.26 The importance of affordable housing as a material consideration has been reflected in several Secretary of State (“SoS”) and appeal decisions. Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance.
- 11.27 In addition to those appeals referenced elsewhere in this Proof of Evidence I set out below further examples of relevant appeal decisions for affordable housing.

Appeal Decision: Land South of Radwinter Road, Saffron Walden (October 2022) (CD 12.36)

- 11.28 This appeal decision in Saffron Walden, Essex, considers the need for affordable housing, having regard to the evidence prepared by my colleague at Tetlow King Planning, that there is a clear need for affordable housing in the authority area. Paragraph 68 at page 13 of the decision states:

“Turning to consider the benefits of the proposal, there is a general imperative to boost the supply of housing land. The delivery of dwellings in an authority which does not have a 5 year supply of housing sites attracts substantial weight. In addition, the proposal would provide 40% affordable housing as well as 5% custom build housing. The delivery of affordable housing would accord with the objectives of policy H9 of the UDLP. Based on the evidence I heard in relation to this matter, in a district where there is a clear need for such provision to be made, these factors also attract substantial weight.”

- 11.29 Paragraph 78 at page 15 summarises the overall scheme benefits and confirms that affordable housing is an individual benefit that carries substantial weight in the planning balance:

“The benefits arising from the proposed development would be substantial. I have concluded that the benefits of housing delivery, affordable housing and custom build housing should all individually carry substantial weight.”

Appeal Decision: Coalpit Heath, South Gloucestershire (CD 12.37)

- 11.30 In this appeal the Inspector considered whether policy-compliant levels of affordable housing would generate a benefit in the planning balance (in this case, the proposed development complies with Policy H3), rather than be considered as merely compliant with policy and thus carrying neutral weight. At paragraph 61 of the decision, the Inspector sets out their clear conclusion:

“The fact that the much needed AH [affordable housing] and CBH [custom build housing] are elements that are no more than that required by policy is irrelevant – they would still comprise significant social benefits that merit substantial weight” (my emphasis).

Appeal Decision: Land off Ashland Road West, Sutton in Ashfield (CD 12.38)

- 11.31 This appeal decision concerns a scheme for up to 300 dwellings of which 10% were to be affordable, located in the neighbouring county of Nottinghamshire. The inspector at paragraph 72 of the decision states that *“in respect of the proposed provision for affordable housing, this would represent a benefit of the development, weighing in its favour”*. It also highlighted the need for affordable housing in the District and attached substantial weight to the provision of affordable housing. At Paragraph 85 the inspector states the following:

“Having regard to the Government’s objective of significantly boosting the supply of homes, the proposed development would have the benefit of contributing up to 300 dwellings towards the supply of housing in the District. Of those dwellings, the proposed 10% contribution to the local supply of affordable housing would be an added benefit, particularly due to the likely numbers involved and the clear need for such housing in the District. Such combined benefits attract substantial weight, particularly in the scenario whereby the Council is not only unable to demonstrate a 5-year HLS but that the deficit concerned is significant” (my emphasis).

- 11.32 Some of the key points I would highlight from these examples are that:

- a. Affordable housing is an important material consideration;
- b. The importance of unmet need for affordable housing being met immediately;
- c. The importance of affordability indicators in understanding the context for affordable housing provision;

- d. Planning Inspectors have attached substantial weight to the provision of affordable housing; and
- e. The recognition of the lived reality of people in housing need, and the importance of providing affordable housing to alleviate their situation.

Summary and Conclusion

- 11.33 Staffordshire Moorlands District is experiencing persistent shortfalls in affordable housing provision, with significant social and economic impacts arising as a result. There is pressure on the Housing Register (which has increased by 45% in the last five years) and affordability indicators suggest that there is a worsening situation in the District.
- 11.34 Drawing all of the above together, against the scale of unmet need there is no doubt in my mind that the provision of up to 71 affordable homes will make a substantial contribution. Considering all the evidence I consider that this contribution should carry **substantial weight** in the determination of this appeal.