

Summary 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

LPA REF: SMD/2021/0610

TKP REF: M24/1106-06.RPT

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Summary Affordable Housing Proof of Evidence

Introduction

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.
2. 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.

Affordable Housing as an Important Material Consideration

3. 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, the Planning Practice Guidance, the National Housing Strategy and the new Government's recent Written Ministerial Statements. **A thriving housing market that offers choice, flexibility and affordable housing is critical to our economic and social wellbeing.**

The Consequences of Failing to Meet Affordable Housing Needs

4. Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant, and Staffordshire Moorlands is no exception. 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**.

The Development Plan and Related Policies

- 5. The statutory Development Plan for Staffordshire Moorlands is the Staffordshire Moorlands Local Plan 2014 to 2031, which was adopted in September 2020.
- 6. The Local Plan discusses the context for affordable housing in the District, noting the challenges in its delivery and the consequences of not providing enough affordable housing. It notably states that *“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”*.
- 7. **Policy H3 ‘Affordable Housing’** is the principal policy for affordable housing in the Local Plan. 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.
- 8. Other policy and strategy documents for Staffordshire Moorlands similarly identify **affordable housing as an important priority for the Council**. These include the Developer Contributions Supplementary Planning Document October 2023; the Homelessness and Rough Sleeping Strategy 2023 to 2028; the Staffordshire Moorlands Corporate Plan 2023 to 2027; and the Housing Implementation Strategy November 2018.

Affordable Housing Needs

- 9. There is a **high level of need for affordable housing** in Staffordshire Moorlands. The most recent assessment is the Staffordshire Moorlands Strategic Housing Market Assessment Update 2017 which 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.

Affordable Housing Delivery

- 10. On a gross basis, 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 overall housing completions**.

11. The above figures include the effect of one strong year of affordable housing delivery in 2014/15, in which 225 affordable dwellings were completed (through a joint venture, 'Ascent', which is no longer in place) and alone accounts for 49% of the gross affordable housing delivery over the Local Plan period to date.
12. 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**.

The impact of the Right to Buy

13. 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. MHCLG data shows that **on average, 13 affordable dwellings have been lost from the affordable housing stock each year** between 2014/15 and 2023/24.
14. Once accounting for these losses, on average over the Local Plan period between 2014/15 and 2023/24, the Council has delivered **33 net affordable housing additions per annum**, equivalent to **19% of the overall housing completions**.

Affordable housing delivery against identified needs

15. Analysis of affordable housing delivery against the upper identified need of 432 affordable dwellings per annum (or 4,320 affordable dwellings between 2014/15 and 2023/24) shows there is **a numerical shortfall of -3,993 dwellings and the Council has met only 8% of the identified need**.
16. Analysis of affordable housing delivery against the lower identified need of 224 affordable dwellings per annum (or 2,240 affordable dwellings between 2014/15 and 2023/24) shows there is **a numerical shortfall of -1,913 dwellings and the Council has met only 15% of the identified need**.
17. Against either the upper or lower figure, it is clear that there is a **substantial and chronic undersupply of affordable housing** in Staffordshire Moorlands.

The Future Supply of Affordable Housing

18. The future supply of affordable housing will not meet identified needs going forward, and the **existing shortfalls will continue to widen**.
19. 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 Indicators

20. 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:
- 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;
 - c. During 2023/24 the Council accommodated **70 households in temporary accommodation**, of whom **51 were housed outside of the District**;
 - 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.
 - 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.
 - 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.

The Benefits of the Proposed Affordable Housing

21. 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.

The Weight to be Attributed to the Proposed Affordable Housing

22. 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.
23. 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.