

ADDITIONAL - APPEAL STATEMENT

This statement to be read together with the planning statement submitted with the planning application AND THE SUBMITTED PLANNING APPEAL STATEMENT

Site at Roughcote Lane, Cookshill

Erection of self build dwelling including resource efficient design



Prepared: by G Willard

Date: 23rd May 2025

Paradise Farm, Main Road, Hollington, Staffordshire, ST10 4HX

m: 07876 022365 e: gezwillard@gmail.com e: willard@wwplanning.co.uk Skype: Gez Willard WWplanning.co.uk

Company registration number : "WW Planning" is trading as part of Willardwillard Ltd. Company registration number 5948350 registered in England.

Additional statement

1.0 Background

1.0 The inspector has sought an additional statement in respect of the council's housing land supply and the implications for this appeal

2.0 LPA position

2.1 The LPA provided an update to the inspector which stated the following:

To: NEW West 2 <west2@planninginspectorate.gov.uk>

Cc: Gez Willard <gez.willard@icloud.com>

Subject: RE: 3358776 Cookshill Hall, Roughcote Lane LPA ref SMD/
2024/0183

Nadia

The Council's current Housing Land Supply position is stated as 2.95 years.

At recent appeal in Froghall, January 2025, our final position was stated as 2.95 years.

The appellant's position was 2.70 years, but the inspector agreed that the positions were so close as to make no difference that he didn't need to hear evidence to nail down a single figure.

3.0 Appellant's further comments

The LPA refer to an appeal (APP/B3438/W/24/3351035). This appeal was determined on 26th March 2025 with the inquiry sitting in January 2025.

The appeal related to a planning application for an out of settlement and large scale residential scheme and it was submitted in outline. The appeal proceeded by means of a public inquiry.

At the appeal the council chose not to defend its reasons for refusal.

The inspector examined the matters before them against national and local planning policy. In the appeal decision the inspector balanced the heritage impacts of the scheme against housing supply matters amongst other things. They confirmed at para 28 that the LPA cannot '*demonstrate a deliverable five year HLS as required by the Framework and where housing delivery has been persistently below what is required by the Local Plan*'.

The inspector stated:

28. The proposal would deliver a substantial number of new homes to Staffordshire Moorlands, which cannot demonstrate a deliverable five year HLS as required by the Framework and where housing delivery has been persistently below what is required by the Local Plan. Furthermore, there has been a chronic shortfall in the delivery of affordable homes in Staffordshire Moorlands and the proposed development would deliver 33% of new homes as affordable homes. The development would also generate economic benefits for Cheadle, both during construction and following completion.

The inspector expands upon the housing supply point in the 'other matters' section and says:

43. The Local Plan for Staffordshire Moorlands was adopted relatively recently, in September 2020 and did not include the appeal site as a housing allocation.

Policy SS3 (future provision and distribution of development) requires provision to be made for 6080 additional dwellings over the plan period 2014-2033.

44. Policy SS3 directs that 75% of new housing should be focused in three settlements, Leek, Biddulph and Cheadle, with the remainder in what is termed Rural Areas.

Cheadle itself would account for 25% of new housing over the plan period. The site lies next to Cheadle but is outside the settlement boundary as defined in the Local Plan. It is therefore within the Rural Areas, which covers most of the district outside the three main settlements of Cheadle, Leek and Biddulph.

45. However, it is clear that the housing planned for in the Local Plan through allocations has not progressed as intended. The plan requires the delivery of 320 new homes per year over the plan period, yet delivery to date only equates to 182 homes per year.

46. In Cheadle, of the 1026 dwellings on allocated sites contained in the Local Plan, only 94 had been delivered by April 2023. Furthermore, of these housing allocations, over 500 dwellings were considered not deliverable by the Council on 1 April 2023.

47. The delivery of allocated housing sites is even worse in Leek and Biddulph over the same period. Within the Rural Areas there has been a much better delivery rate, albeit much less housing is allocated there.

48. The Inspector's report into the examination of the Local Plan identified that at that time there had been persistent under-delivery of housing, which is compounded by the current delivery rates.

49. Policy SS3 requires that 'Sufficient deliverable land will be identified to provide at least 5 years of development at all times and that 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'.

50. At the time that planning permission was refused for the proposed development the Council accepted that it could only demonstrate a deliverable HLS of 3.58 years, significantly less than the minimum required by the Framework. This had fallen to 3.51 years at the opening of the Inquiry, although this was disputed by the appellant, who considered the HLS was only 2.70 years.

51. During discussions at the Inquiry, the Council was unable to demonstrate the deliverability of seven of the sites it was relying upon for its 3.51 years HLS. Whilst the Council said it was confident the evidence existed, it accepted it was not before the Inquiry, and so for the purposes of this appeal the Council accepted its HLS was just 2.95 years.

52. Concerns were raised that the HLS did not account for the housing delivered around Cheadle on unallocated sites at appeal. However, from the evidence I am satisfied that windfall sites have been adequately considered in calculating the HLS for Staffordshire Moorlands.

53. I note the disagreement between the main parties regarding whether a small site windfall allowance should be included in the HLS calculation. In this case the relatively small difference between a 2.7 year HLS and a 2.95 year HLS is not significant to my decision. Whilst the greater the shortfall the more the weight that would be attached to it, a deliverable HLS of only 2.95 years is still substantially below the minimum requirements contained in the Framework.

54. Policy SS4 (strategic housing and employment land supply) requires the Local Plan to be reviewed no later than September 2025, to assess whether it needs updating to bring forward additional sites for development. Even if the Local Plan review were to commence in September 2025, it would be several years before a revised plan could be adopted. Despite monitoring the annual development rate, there is no substantive evidence that the Council is managing the supply of housing effectively at present.

Paradise Farm, Main Road, Hollington, Staffordshire, ST10 4HX

m: 07876 022365 e: gezwillard@gmail.com e: willard@wwplanning.co.uk Skype: Gez Willard WWplanning.co.uk

Company registration number : "WW Planning" is trading as part of Willardwillard Ltd. Company registration number 5948350 registered in England.

55. The significant under delivery of homes in Staffordshire Moorlands over the current Local Plan period has had an even greater effect in terms of affordable housing. The Strategic Housing Market Assessment updated in 2017 (SHMA) identified an objectively assessed need of 224 - 432 net affordable dwellings per year between 2014/15 and 2030/31 in Staffordshire Moorlands.

56. However, it is common ground between the Council and the appellant that only 327 net affordable homes were provided between 2014/15 and 2023/24, an average of just 33 per year. This equates to the delivery of just 8-15% of the identified annual need for affordable homes contained in the SHMA during this period, which is a chronic shortfall in delivery of affordable homes.

57. The Council also has a statutory duty under Section 2A(2) of the Self-Build and Custom Housebuilding Act 2015 (as amended) to grant permission for the carrying out of self-build and custom housebuilding on enough serviced plots of land to meet the demand for self-build and custom housebuilding in its area over a specific period of time.

58. In the Statement of Common Ground with the appellant on this subject, the Council accepts there has been a shortfall in permissions for self-build and custom housing. No compelling evidence has been provided that would cause me to doubt the position of the main parties in this regard.

59. Taking all of this into account, it is clear that there is a pressing, current need for new housing in the district. Whilst located outside the Cheadle settlement boundary, the circumstances I have described lend significant weight to the appeal scheme in bringing forward this much needed housing.

4.0 Conclusion

The same policies and housing supply facts apply in this case and the following main points can be drawn from that appeal that are material to this current appeal.

- At best (it is contested) the LPA has deliverable HLS of only 2.95 years which is still substantially below the minimum requirements contained in the Framework.
- There is a significant shortfall in permissions for self-build and custom housing.
- The housing planned for in the Local Plan through allocations has not progressed as intended. The plan requires the delivery of 320 new homes per year over the plan period, but the delivery only equates to 182 homes per year so far.
- There is no substantive evidence that the LPA is managing the supply of housing effectively at present.
- There is a pressing, current need for new housing in the district.

So significant is the LPA's housing supply shortfall that notwithstanding in this appeal case that only a single dwelling is involved considerable weight in favour of the appeal should be afforded to this matter. This is especially so as this is for a self build dwelling for which the council also has a woeful under supply.

Finally of course the same national planning policy which requires a significant increase in housing supply makes no distinction to the number of houses proposed. All planning permissions granted for housing contribute to the housing supply and set a precedent for further positive decisions within the district in the future. All decisions count. It could be argued that permissions for self build dwellings (as with this appeal) should be weighed even more heavily given an effective double presumption in support.