

PROOF OF EVIDENCE

RICHARD HOLLIDAY

**FIVE YEAR HOUSING LAND
SUPPLY AND AFFORDABLE
HOUSING NEED**

**Proposed Residential
Development, Land at Talbot
Road, Glossop**

Derbyshire County Council

21 July 2026

Carter Jonas

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Qualifications and Experience

I am Richard Holliday. I have a BSc (Hons) in Geography from Queen Mary University of London and a master's degree in Town and Regional Planning from Leeds Beckett University. I am a Chartered Member of the Royal Town Planning Institute.

I have over 18 years' professional experience in the field of town planning. I am an Associate Partner at Carter Jonas LLP, based in their Leeds office at 9 Bond Court, Leeds, West Yorkshire, LS1 2JZ. I joined Carter Jonas LLP in May 2022 as an Associate and became an Associate Partner in July 2025.

Before this, I spent 14 years within Local Planning Authorities, including City of Bradford Metropolitan District Council and Kirklees Council. Immediately prior to joining Carter Jonas LLP, I was a Senior Planning Officer within Bradford Council's Major Developments and Minerals and Waste Planning Team where I worked on a broad range of major development proposals.

My CV is attached at **Appendix 1**.

I have acted on behalf of both public and private sector clients, including housebuilders, councils, government departments, landowners, and developers, advising on a wide range of planning matters, including residential developments, education, healthcare, and commercial development proposals.

Declaration

The evidence which I have prepared and provide for this appeal reference 6006040 (in this proof of evidence, written statement or report) 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. INTRODUCTION

- 1.1 This Proof of Evidence has been prepared by Mr Richard Holliday in support of an appeal (“the Appeal”) by Derbyshire County Council (“the Appellant”) against the decision of High Peak Borough Council (“the Council”) to refuse outline planning permission (“the Application”).
- 1.2 The application description of development was:

“Outline planning application for the construction of up to 110 dwellings, with all matters reserved (except principal points of access) including all associated ancillary works and engineering operations”
- 1.3 High Peak Borough Council is currently unable to demonstrate a five-year supply of housing land, thereby in conflict with the requirement of paragraph 78 of the National Planning Policy Framework (NPPF) **[CD 5.1]** which requires Local Planning Authorities (LPA) to identify and update an annual supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old.
- 1.4 The Council accepts that it cannot demonstrate a five-year housing land supply (5YHLS). Its latest publicly position (published March 2025 and reflecting the position as of 1st April 2023) **[CD 13.1]** is that it can demonstrate a 5YHLS of 2.85 years, measured against its housing requirement, including identified shortfall and 5% buffer.
- 1.5 Since the publication of that 5YHLS statement, and as part of this appeal, the Council has reviewed its 5YHLS for the purposes of this appeal and prepared an updated 5YHLS statement, issued on 6th June 2026 and measured against a baseline date of 1st April 2025 **[CD 13.4]**. This statement identifies a supply of only 2.47 years, with the shortfall equivalent to 1,505 homes over the five-year period. This has been measured against a Standard Method housing requirement of 595 dwellings per annum. However, as set out below, the Appellant’s position is that the shortfall is 1,896 homes and a five-year supply of only 1.89 years.
- 1.6 On any basis, the Council can only demonstrate less than half of the required supply, representing a severe and persistent failure to meet housing needs.
- 1.7 Furthermore, based on the Council’s recent Annual Monitoring Report (published December 2025) **[CD 6.17]**, it is expected that the upcoming Housing Delivery Test results will show a significant drop in delivery rates for High Peak, such that the 20% buffer would apply. This would increase annual housing requirement to 696 dwellings, and result in a five-year supply equivalent to only 1.65 years.
- 1.8 Irrespective of which figure is used, the Council’s inability to demonstrate sufficient supply runs contrary to the Government’s objective of significantly boosting the supply of homes, as set out in paragraph 61 of the NPPF.
- 1.9 Despite this significant shortfall in housing land supply, the Council refused the application on 12th September 2025 **[CD 4.3]**.
- 1.10 The Appellant issued a notice of intention to appeal to PINS and the Council on 6th February 2026, and the Appeal was subsequently submitted on 6th March 2026.

- 1.11 This Proof of Evidence sets out the appellant's position in respect of housing supply as well as the need for market and affordable housing.

2. PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF)

2.1 The National Planning Policy Framework was first published in March 2012. It was subsequently revised in July 2018, February 2019, July 2021, September 2023, December 2023, and again on 12th December 2025, with minor amendments published on 7th February 2025.

2.2 The sections of the NPPF relevant to my Proof of Evidence include:

2.3 Paragraph 11 which states:

“d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.”

2.4 Footnote 8 States:

“This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 232.”

2.5 Footnote 9 advises that the “policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.”

2.6 Paragraph 61 supports the Government's objective of significantly boosting the supply of homes.

2.7 Paragraph 62 advises 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.

2.8 Paragraph 78 states the following:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies³⁸, or against their local housing need where the strategic policies are more than five years old³⁹. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 20% where there has been significant under delivery⁴⁰ of housing over the previous three years, to improve the prospect of achieving the planned supply; or
- c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework⁴¹, and whose annual average housing requirement⁴² is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.”

2.9 Footnote 39 states: “Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance.”

2.10 Footnote 40 states that “This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.”

2.11 Paragraph 79 advises that:

“To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority’s housing requirement over the previous three years, the following policy consequences should apply:

a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years;

b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;

c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.”

2.12 Annex 2 – Glossary includes the following definition of ‘deliverable’:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register,

it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

Planning Practice Guidance (PPG)

2.13 The following chapters of the PPG are relevant:

- Chapter 2a -Housing and economic needs assessment [CD 5.3]
- Chapter 3 – Housing and economic land availability assessments [CD 5.2]
- Chapter 67 – Housing needs of different groups [CD 5.4]
- Chapter 68 – Housing supply and delivery [CD 5.5]

Written Ministerial Statements

- WMS – Further support for social and affordable housebuilding and next steps on supported housing (12th February 2025) [CD 5.14]
- WMS – Social and affordable housing renewal (2nd July 2025) [CD 5.15]
- WMS – Planning Reform: Next Phase (16th December 2025) [CD 5.16]

Local Planning Policy

2.14 The existing development plan comprises the High Peak Local Plan, which was adopted on 14th April 2016. [CD 6.1]

2.15 The following Local Plan policies are considered most relevant to housing matters for this appeal:

- Policy S3 (Strategic Housing Development) identifies a minimum housing requirement for 7,000 dwellings over the period
- Policy H1 (Location of Housing Development)
- Policy H2 (Housing Allocations)
- Policy H3 (New Housing Development)
- Policy H4 (Affordable Housing)

2.16 The adopted strategic policies of the Local Plan are more than five years old. Therefore, the five-year housing land supply should be calculated against the local housing need.

2.17 On 23rd June 2022, the Council’s Executive agreed that High Peak Local Plan Policies S3 (Strategic Housing Development), Policy S4 (Maintaining and Enhancing an Economic Base) and Policy H4 (Affordable Housing) are out of date for development management purposes.

Emerging Local Plan

2.18 The Council conducted an early engagement consultation of the High Peak Borough Council Local Plan Review (Reg 18) from 19th January to 3rd March 2023, with the feedback from this consultation expected

to help the council identify the issues and options for the Local Plan that the LDS in place at that time had programmed for later in 2023.

- 2.19 The Local Development Scheme (LDS) published in February 2025 **[CD 6.11]** (in effect at the time of the planning application's submission and determination) set the following Local Plan timetable:
- Early Engagement – January – March 2023
 - Preferred Options Consultation – Spring 2025
 - Proposed Submission Consultation – Winter 2025
 - Submission of Local Plan – Spring 2026
 - Examination – Summer 2026
 - Adoption – Autumn 2026
- 2.20 The Council is therefore significantly delayed in its progress against this timetable. To date, the Council has not progressed beyond the early engagement carried out between January and March 2023, which represents a three-year period without updates or meaningful progress in preparing its new plan.
- 2.21 The Council has subsequently updated the LDS in January 2026, which was published on 6th March 2026 **[CD 6.12]**. This updated LDS identifies the following timescales for preparation of the new Local Plan:
- Early Engagement – January – March 2023
 - Draft Local Plan (Reg 18) – Q1 2026
 - Proposed Submission Consultation (Reg 19) – Q4 2026
 - Submission of Local Plan – Q4 2026
 - Examination – Q2 2027
 - Adoption – Q1 2028
- 2.22 The Regulation 18 consultation scheduled for Q1 2026 has not yet been undertaken, and the plan is therefore approximately 3 months behind the updated schedule at present.
- 2.23 It is doubtful that the Council will be able to conduct the Regulation 18 and 19 consultations sufficiently promptly to enable the submission of the Local Plan for examination before the end of 2026 as set out in the updated LDS.
- 2.24 The evidence base documentation, such as the Strategic Housing and Employment Land Availability Assessment (SHELAA) was published in 2009 and an update to the SHLAA published in April 2014 **[CD 6.3]**.
- 2.25 No further information is available to confirm that the evidence base has been or is in the process of being updated to inform the preparation of a new plan. There are no further updates available on the emerging Local Plan; however, the Council launched a call for sites on 6th February 2025 which remains open for submissions.

- 2.26 It is unclear what progress, if any, the Council has made against its latest LDS and when it might be in a position to undertake consultation on the draft plan.

High Peak Five Year Housing Land Supply Statements

- 2.27 The following five-year housing land supply statements cover the most recent years (also covered by the most recent Housing Delivery Test results and the Council's Annual Monitoring Reports, as referenced below) and are considered most relevant to the appeal:
- High Peak 5 year Housing Land Supply May 2026 (prepared in response to the appeal) **[CD 13.4 and CD 13.5]**
 - High Peak 5 year Housing Land Supply Interim Position Statement March 2025 **[CD 13.1]**
 - High Peak 5 year Housing Land Supply April 2023 **[CD 13.2]**
 - High Peak 5 year Housing Land Supply April 2022 **[CD 13.6]**
 - High Peak 5 year Housing Land Supply April 2021 **[CD 13.7]**
 - High Peak 5 year Housing Land Supply April 2020 **[CD 13.3]**
- 2.28 The Council's most recent 5YHLS statement was prepared in May 2026 in response to this appeal and claims a deliverable supply of 1,472 dwellings, which equates to 2.47 years supply against the five-year housing requirement.
- 2.29 As set out below, the Appellant disputes the deliverable supply and therefore considers that the five-year supply is less than identified by the Council.

High Peak Borough Council Annual Monitoring Reports

- Authority Monitoring Report 2024-2025 **[CD 6.17]**
- Authority Monitoring Report 2023-24 **[CD 6.18]**
- Authority Monitoring Report 2022-23 **[CD 6.19]**
- Authority Monitoring Report 2021-2022 **[CD 6.20]**
- Authority Monitoring Report 2020-2021 **[CD 6.21]**
- Authority Monitoring Report 2019-2020 **[CD 6.22]**

Other Relevant Local Policies and Strategies

- High Peak Housing Strategy 2025 – 2030 **[CD 6.13]**
- High Peak Housing Economic Land Needs Assessment (2022) **[CD 6.2]**
- Strategic Housing and Employment Land Availability Assessment (SHELAA) (2009 and 2014 update) **[CD 6.3]**
- Derbyshire Homelessness and Rough Sleeping Strategy 2022 – 2027 **[CD 6.14]**

- High Peak Borough Plan 2023 – 2028 (refreshed April 2026) [**CD 6.15**]

3. NATIONAL HOUSING CRISIS

- 3.1 There is a considerable amount of research and commentary on the national housing crisis. In short, there is a fundamental, clear and urgent need for greater housing delivery across the country to help address significant unmet need, which has worsened over recent years.
- 3.2 In his Written Ministerial Statement on 16th December 2025 (Statement UIN HCWS1187) **[CD 5.16]**, the Minister of State for Housing and Planning, Matthew Pennycook, stated that:

“England remains in the grip of a housing crisis that is both acute and entrenched. The detrimental consequences of this disastrous state of affairs are now all pervasive: a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into unaffordable private rented housing; and more than 170,000 homeless children living in temporary accommodation.”

- 3.3 The Government has a clearly stated aim of significantly boosting housebuilding in order to meet a target of delivering 1.5 million homes across this Parliament. This would involve delivering around 300,000 homes per year.
- 3.4 The Government is undertaking a series of reforms to the planning system in order to help boost housing delivery. As set out in the WMS on 16th December 2025, changes to the NPPF have been made, with the statement setting out that:

“Amongst the many changes made in that initial revision to the Framework were the restoration and raising of mandatory housing targets; a new Standard Method for assessing housing needs aligned to our 1.5 million new homes target; greater support for social and affordable housing provision; a strengthening of policy relating to brownfield land development; a modernised, strategic approach to Green Belt land designation and release; and enhanced support for key economic sectors and clean energy infrastructure.”

- 3.5 The Minister of State for Housing and Planning made a Written Ministerial Statement on 27th November 2025 **[CD 5.27]**, again reiterating the Government's commitment to building 1.5 million new homes this Parliament. Within this statement, the Minister commented on the need to speed-up the plan-making process and for local authorities to prepare and adopt up-to-date plans stated:

“In order to deliver the homes and growth the country needs, we expect all local planning authorities to make every effort to get up-to-date local plans in place as soon as possible.”

- 3.6 Over recent years, the Government and industry research has shown that there is an identified need for significantly more housing than has been delivered in recent years. Estimates on the level of housing required range from between 200,000 to 350,000 new homes per year. Taking the Government's own target of 300,000 new homes per year will require a significant increase in housebuilding.

A National Plan to End Homelessness, December 2025

- 3.7 The consequences of not delivering sufficient new housing and in particular affordable homes, is an increase in unaffordable properties, rents, and homelessness.
- 3.8 On the matter of increasing levels of homelessness, the Government published its national homelessness strategy in December 2025 **[CD 5.17]**, setting out how the Government intends to tackle homelessness.

- 3.9 The strategy sets out that “*every day last year, around 900 households, including almost 300 families with children, were newly made homeless or threatened with homelessness*”. It continues that “*There are a record 132,410 households, including 172,420 children, living in temporary accommodation in England*”.
- 3.10 The strategy states that “*the Government has inherited a housing and homelessness crisis. Not enough social and affordable housing has been built for decades.*”
- 3.11 A long-term goal to help address the root cause of homelessness is to build 1.5 million homes, including a generational increase in social and affordable homes. This confirms that the Government is focusing on building more homes that are affordable.

4. HIGH PEAK ANNUAL HOUSING DELIVERY (2011 – 2025)

- 4.1 The Housing Delivery Test provides an annual measure of housing delivery for each plan-making authority. The Government aims to publish the HDT results annually; however, the publication of results for 2024 and 2025 has been delayed.
- 4.2 The most recent HDT result is therefore the 2023 result **[CD 13.8]**, which for High Peak provides a result of 153%. As such, national policy requires the application of a 5% buffer. Scenarios 1-3 above have been calculated in line with the 5% buffer.
- 4.3 Notwithstanding this, the 2023 HDT result is considered to be an outdated snapshot and does not reflect the more recent fall in housing delivery that has occurred in High Peak over the last three years.
- 4.4 More recent data is available in the Council's latest Annual Monitoring Report (2024-2025) **[CD 6.17]**, which provides at Table 9 an overview of annual housing completions (net) over the plan period (from 2011/12 to 2024/25).
- 4.5 **Table 1** below uses data from Table 9 within the Council's latest AMR to show the completions measured against a target of 350 dwellings per annum (set within the High Peak Local Plan) and the level of under/over provision against the housing requirement. The table illustrates that there is a significant shortfall against the Local Plan derived annual housing requirement across the plan period.

Table 1: Overview of Annual Housing Completions (net) over the plan period

Year	Requirement (dwellings per annum)	Completions (net)	Under / Over Provision	Cumulative Under / Over Provision
2011/12	350	116	-234	-234
2012/13	350	214	-136	-370
2013/14	350	37	-313	-683
2014/15	350	109	-241	-924
2015/16	350	161	-189	-1,113
2016/17	350	332	-18	-1,131
2017/18	350	502	+152	-979
2018/19	350	386	+36	-943
2019/20	350	308	-42	-985
2020/21	350	249	-101	-1,086
2021/22	350	389	+39	-1,047
2022/23	350	426	+76	-971
2023/24	350	268	-82	-1,053
2024/25	350	202	-148	-1,201
Total	4,900	3,699	-1,201	

- 4.6 Looking at the most recent three-year period, from 2022/23 to 2024/25, Table 2 below compares the completions across High Peak against the Local Housing Need figure of 609 dwellings per annum (applicable at the base date of 1st April 2026).

Table 2: Completions against LHN from 2022/23 to 2024/25

Year	Requirement (dwellings per annum)	Total Completions (net)	Under / Over Provision
2022/23	609	426	-183
2023/24	609	268	-341
2024/25	609	202	-407
Total	1,827	896	-931

- 4.7 As can be seen above, annual housing delivery has failed to reach the levels necessary to meet the annual housing requirement and looking at the housing completions across the plan period measured against the Local Plan housing target as noted above, there is a deficit of 1,201 dwellings.
- 4.8 However, looking at the most recent three-year period and measured against the Local Housing Need (standard method derived figure), there is a deficit of 931 dwellings within this three-year period. Looking ahead, this deficit is expected to worsen, as considered below.

5. LOCAL HOUSING NEED AND FIVE-YEAR HOUSING LAND SUPPLY BASE DATE

Annual Housing Requirement

- 5.1 The Council's adopted Local Plan is now more than five years old (adopted in 2016). The Council has conducted a review and found that the plan is out of date and should be updated. As such, the local housing need should be calculated using the standard method.
- 5.2 Local housing need must be calculated using the standard method as set out in the Planning Practice Guidance (Paragraph: 004 Reference ID: 2a-004-20241212) **[CD 5.3]**, which calculates a baseline value based on the existing housing stock for the area and an adjustment factor based on local affordability. Those figures are published by the Ministry of Housing, Communities and Local Government and Office for National Statistics, respectively.
- 5.3 In calculating the five-year housing land supply, an appropriate buffer of either 5% or 20% should be applied. In this case, the Council has applied the 5% buffer, which is applicable to all authorities in order to ensure choice and competition in the market. The 20% buffer applies to authorities "where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results".
- 5.4 The last published HDT results (2023) **[CD 13.8]** identified a housing delivery of 153% for High Peak. The 2024 and 2025 HDT results have not yet been published although it is understood that this is anticipated in the near future. When published, the results may materially alter the Council's performance and the buffer to be applied.
- 5.5 It should be noted that the baseline housing need figure differs between the 2025 and 2026 base dates. This is due to changes in the housing stock baseline figure and adjustment factor to be applied.
- 5.6 For a base date of 1st April 2026, the baseline was 356 dwellings, which is based on 0.8% of the existing housing stock of 44,450 (as per Table 125: dwelling stock estimates by local authority district).
- 5.7 The affordability ratio to be applied to the baseline of 356 dwellings is calculated using the mean average affordability ratio for the most recent five years (to 1st April 2026), which is 8.32 (as per ONS 'House price to workplace-based earnings ratio' dataset, published on 26th March 2026). Using the relevant formula to calculate the adjustment factor ($\text{Adjustment Factor} = ((\text{five year average affordability ratio} - 5)/5) \times 0.95 + 1$), the adjustment factor would therefore be 1.6308.
- 5.8 Against the base date of 1st April 2026, this results in an annual local housing need figure of 580 dwellings (before applying the necessary buffer).
- 5.9 For the base date of 1st April 2025, as applied by the Council, the figure equates to 567 dwellings (before applying the necessary buffer).

Base Date

- 5.10 The Appellant's position is that 1st April 2026 should be used as the base date for the assessment of housing need and supply. This allows an assessment based upon the most up-to-date evidence available, including the most recent data for housing completions, existing housing stock, and affordability ratio. It is entirely normal to consider housing supply by reference to the start of the most

recent monitoring year and this accords with paragraph 78 of the NPPF. It is not clear why the Council has not done this, particularly having regard to paragraph 78 of the NPPF.

- 5.11 The Appellant's position is also that a number of sites included in the Council's 5YHLS do not meet the definition of deliverable (as detailed in chapter 7 below).

6. WHAT CONSTITUTES A DELIVERABLE SITE

6.1 The NPPF and PPG provide guidance on which sites can be considered to be deliverable. It separates sites into Category A and Category B sites, with each category having a different test for deliverability.

6.2 The NPPF provides the following definition of 'deliverable' within the glossary at Annex 2:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years."

6.3 Therefore, for Category B sites, the NPPF and PPG require that any site included within the five-year supply must be supported by clear, robust and up-to-date evidence of deliverability. This is a stringent test, particularly for sites without detailed planning permission.

6.4 It is not sufficient for the Council to rely on assumptions or indicative trajectories. Absent clear evidence such as active progress on reserved matters, agreed delivery programmes, or developer commitments, such sites cannot reasonably be regarded as deliverable within the meaning of national policy.

6.5 In relation to the second point ("category B" sites) the Planning Practice Guidance (Paragraph: 007 Reference ID: 68-007-20190722) **[CD 5.5]** elaborates on this, advising on "what constitutes a 'deliverable' housing site in the context of plan-making and decision-taking?"

"In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- *have outline planning permission for major development;*
- *are allocated in a development plan;*
- *have a grant of permission in principle; or*
- *are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link*

to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;

- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
- *firm progress with site assessment work; or*
- *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites.”

6.6 The NPPF and PPG are clear that the Council should have robust and up-to-date evidence to demonstrate that sites are deliverable and therefore capable of being included within the five-year supply. In the absence of such evidence, the Council can only rely on the type of sites set out in category A above as being deliverable and included within the five-year supply (subject to there being no contrary clear evidence for such category A sites).

6.7 The NPPF defines what constitutes a developable site, and the PPG **[CD 5.5]** advises that to demonstrate a reasonable prospect, evidence can include:

- *“written commitment or agreement that relevant funding is likely to come forward within the timescale indicated, such as an award of grant funding;*
- *written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
- *likely buildout rates based on sites with similar characteristics; and*
- *current planning status - for example, a larger scale site with only outline permission where there is supporting evidence that the site is suitable and available, may indicate development could be completed within the next 6-10 years.”*

6.8 Where a local planning authority must provide clear evidence, Inspectors and the Secretary of State routinely require cogent evidence rather than assertion. For example, in an appeal regarding Little Sparrows, Sonning Common (3265861 – 25th June 2021) **[CD 7.17]**, the Inspector explained at paragraph 20:

- *‘Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are there planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed. Securing an email or completed pro-forma from a developer or agent does not in itself constitute ‘clear evidence’. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward’*

7. ASSESSMENT OF SITES

- 7.1 The Council's latest Five-Year Housing Land Supply statement **[CD 13.4]** includes two tables:
- Table 1 details large sites with planning permission (Category A sites)
 - Table 2 details Local Plan Allocations (Category B sites)
- 7.2 For each site, the expected delivery timescales and rates have been assessed. Those sites where deliverability is questioned are outlined below. Those sites identified below are considered to present deliverability concerns relating to matters such as approval of reserved matters applications, discharge of conditions, and/or timescales for implementation.
- 7.3 A request was made to the Council on 15th June 2026 for provision of the following information relating to the sites included within the Council's five-year supply, to evidence that these were deliverable:
- Confirmation of developer interest or involvement
 - Progress on planning applications
 - For sites which have been delayed, the reason for the delay and evidence of how this is addressed by the applicant to the LPA
 - Indicative build-out rates and anticipated start/completion dates
- 7.4 In response, the Council provided an updated housing trajectory spreadsheet, with an additional column to provide additional information. This was provided by the Council on 29th June 2026 **[CD 13.5]**.
- 7.5 With regard to Category B sites, the NPPF, PPG and appeal precedents confirm that generic assumptions do not constitute the required clear evidence and, in the absence of clear and compelling evidence demonstrating that development will commence and deliver completions within five years, those sites fail the NPPF definition of deliverable and should be excluded from the five-year housing land supply.

Sites Removed by Change of Base Date

- 7.6 As a consequence of the Appellant using 1st April 2026 for the base date to reflect the most recent monitoring period, the following sites should be removed from the five-year supply due to their completion before the base date of 1st April 2026.
- HPK/2017/0694 – Macclesfield Road / Linglongs Road, Whaley Bridge (19 units)
 - HPK/2017/0534 – Hayfield Road / Derby Road, New Mills (49 units)
 - HPK/2017/0590 – Land off Ashbourne Road, Buxton (51 units)
 - HPK/2016/0476 – Rear of Old Vicarage (15 units)
 - HPK/2016/0488 – Hallsteads, Dove Holes (15 units)
 - HPK/2020/0107 – Uplands/Land East of Woolley Bridge, Hadfield (7 units)
- 7.7 The omission of these six sites removes 156 dwellings from the Council's trajectory.

HPK/2023/0025 – Land South of Hollin Cross Lane, Glossop (Category A Site)

- 7.8 This planning permission approved the development of 24 dwellings, approved on 20th October 2023. The permission will therefore expire in less than 3 months, on 19th October 2026.
- 7.9 A discharge of condition application was submitted (ref. DOC/2026/0036) on 13th May 2026 and made valid on 4th June 2026, which seeks to discharge conditions 3, 4, 11, 12, 14, 15, 16, 18, 19, 20, 22, 23, 24, 26, 27, 29, 31, 32, 33, 35, 36, 37, 42 & 43. These conditions cover a wide range of detailed technical matters.
- 7.10 Some consultation responses are available and there are objections from the archaeologist, highways, and LLFA, who have advised that additional information is required to be able to discharge the relevant conditions, including pre-commencement conditions.
- 7.11 Additionally, the current discharge of condition application does not appear to include details in respect of conditions 6, 7, 25, which state that “no development hereby permitted shall be commenced until...” specific details have been submitted to and approved by the Council.
- 7.12 Conditions 6 and 7 are pre-commencement conditions and are listed below a subheading titled ‘Redcourt Building’ and therefore appear to relate specifically to that building only and not wider works. However, condition 25 relates to the development as a whole and requires a Japanese knotweed survey and report to be submitted to and approved by the LPA before any works commence.
- 7.13 In less than three months, the planning permission will expire. The discharge of condition application relates to a number of technical matters and consultee comments have been made in objection to the application.
- 7.14 The likelihood of all relevant consultees reviewing the information submitted and the Council being in a position to approve the current application to enable development to begin before the permission expires is questionable. Furthermore, details required by conditions 6, 7, and importantly, condition 25, require the submission and approval of details before development commences, and the existing discharge of condition application has received objections from consultees.
- 7.15 Taking these factors together there is clear evidence to demonstrate that this site is not deliverable before the permission expires and the site should not be relied upon as a deliverable housing site.
- 7.16 As such, this site should be removed from the 5YHLS.

HPK/2023/0192 – Land at Hogshaw, Buxton (Category B Site)

- 7.17 This planning application was submitted on 15th May 2023 and made valid on 23rd May 2023. It seeks full planning permission for 99 dwellings. It relates to site allocation ref. DS17.
- 7.18 The application was referred to planning committee on 11th August 2025 and although subject to a resolution to grant planning permission, nearly one year later, the decision notice has not been issued and it is assumed this delay is a result of negotiations for a Section 106 agreement. It is noted that the applicant has signed Certificate B and identified two additional landowners, whose interests may need addressing before they sign any S106 agreement and a planning permission can be issued.
- 7.19 There is no evidence available to demonstrate when the S106 will be completed or when the decision notice is expected to be issued, nor any indication of the submission of any discharge of conditions

applications. Notwithstanding this, the site is included in the Council's 5YHLS for 2028/29 and 2029/30 to deliver 39 units in each year.

- 7.20 Adherence to this timescale would be dependent on swift resolution of any outstanding matters and issuing of the decision notice, along with prompt preparation, submission and determination of discharge of conditions applications. The Council has not provided any site-specific evidence demonstrating that the timescales are realistic, such as an update on progress of the s106 agreement and the application's determination timescales, and no evidence has been provided to demonstrate the developer's delivery intentions and anticipated start and build-out rates.
- 7.21 In the absence of any such clear evidence, as required by the NPPF and PPG, there is insufficient justification for treating the site as deliverable for the purposes of the five-year housing land supply. Accordingly, the site should not be included in the housing supply.

HPK/2019/0200 – Dinting Road (Category B Site)

- 7.22 For this site, outline planning permission was granted on 17th April 2023. Reserved Matters application ref. HPK/2025/0287 was submitted on 25th July 2025 and validated on 1st August 2025. It has an agreed extension of time to 4th May 2026. Notwithstanding this, the application remains under consideration by the Council. The application relates to Local Plan site allocation ref. G19.
- 7.23 The most recent update on the public file comprises a consultation response from the Council's arboricultural officer on 15th January 2026. Before this, the most recent update (aside from public comments) includes an ecology consultation response on 7th October 2025 and the applicant's CEMP on 20th October 2025. Prior to this, several consultation responses have raised concerns with the proposed development.
- 7.24 Based on the information available on the Council's public access system, it is unclear whether the applicant is working on preparing an updated/revised scheme and supporting documentation to address those consultation responses and, if so, the timescales for submission of those documents, subsequent review by the Council, and any anticipated timescales for determination of the application.
- 7.25 The Council's 5YHLS statement includes the first 26 units being delivered on this site in 2028/29 and the remaining 39 units in 2029/30.
- 7.26 Allowing an average of 18 months from approval of reserved matters to first house completion means that the application would need to satisfactorily address all outstanding technical queries and be determined in the very near future to achieve the trajectory set out in the Council's statement.
- 7.27 In any event, as this is a Category B site, in the absence of any evidence to demonstrate that these matters are being addressed and a timescale for doing so, as required by the NPPF and PPG, it is considered appropriate to remove this site (65 units) from the 5YHLS.

Summary of Site Assessments

- 7.28 The Council has not provided evidence to demonstrate that all of the sites included within its five-year supply are indeed deliverable. Taking account of the guidance contained within the NPPF and PPG, specific sites where the delivery is not justified should be omitted from the housing land supply. Evidence is required to be clear and demonstrable rather than an assumption or assertion. The sites included in the Council's supply have been reviewed to determine whether the Council's assumptions are appropriate.

- 7.29 The sites listed above are not considered to benefit from the necessary evidence to demonstrate their deliverability within the five-year period and should therefore be removed from the supply.
- 7.30 The Council's claimed supply of 1,472 dwellings is not supported by robust evidence. A rigorous assessment of deliverability reduces this figure to 1,149 dwellings.
- 7.31 The Council's use of 1st April 2025 for the base date of their five-year supply calculation is also incorrect. The Appellant considers that an appropriate base date would be 1st April 2026, reflective of the most recent monitoring year.
- 7.32 The Council's trajectory included within their 5YHLS statement would therefore be updated as below.

Table 3: Council's Housing Trajectory (revised to reflect removal of the above sites)

Application /Site	2026/27	2027/28	2028/29	2029/30	2030/31	Total
Category A	129	110	32	0	0	271
Category B	216	205	78	9	0	508
						779

8. AFFORDABLE HOUSING

Affordable Housing Policy Context

- 8.1 The appeal scheme proposes the on-site provision of 30% affordable housing, which would amount to up to 30 dwellings. The provision of 30% affordable housing is consistent with Local Plan Policy H4 **[CD 6.1]**.
- 8.2 The provision of affordable housing is a key component of residential developments and the NPPF sets out a strong emphasis on the delivery of affordable housing, particularly at paragraphs 20 and 63.
- 8.3 Paragraph 61 sets out the Government's aim to significantly boost the supply of housing and this aim is reinforced throughout the NPPF, including the importance of affordable homes.
- 8.4 Paragraph 63 requires LPAs to assess the size, type, and tenure of housing needed for different groups, including those who require affordable housing.
- 8.5 NPPF Paragraph 11d also makes affordable housing a key element of the tilted balance, directing that the decision maker gives affordable housing provision particular regard.
- 8.6 The need for affordable housing has also been emphasised in recent Government statements and publications, including:

Written Ministerial Statement – Building the Homes We Need (30th July 2024)

- 8.7 The then Secretary of State, Angela Rayner, delivered a WMS **[CD 5.18]** setting out the Government's aspirations to build a greater share of genuinely affordable homes and that this is vital to help local authorities manage local pressures, including tackling and preventing homelessness.

Written Ministerial Statement – Building the Homes We Need (12th December 2024)

- 8.8 The Minister of State for Housing and Planning, Matthew Pennycook, delivered a WMS **[CD 5.19]** in which he reiterated the Government's aim of delivering 1.5 million new homes during the course of this Parliament and that the reforms will deliver substantial affordable housing.
- 8.9 The WMS also highlighted that the average new home is out of reach for the average worker and that the number of children in temporary accommodation is at a historic high of nearly 160,000:

"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."

Written Ministerial Statement – Further support for social and affordable housebuilding and next steps on supported housing (12th February 2025)

- 8.10 The Minister of State for Housing and Planning, Matthew Pennycook delivered a further WMS **[CD 5.14]** in which he again referenced the housing crisis and, specifically, the need for affordable homes, stating that the Government is to *"deliver the biggest increase in social and affordable housebuilding in a generation"*.

- 8.11 He also stated that:

“England is in the grip of an acute and entrenched housing crisis. The detrimental consequences of this disastrous state of affairs are now all pervasive. We have a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into insecure, unaffordable and far too often sub-standard private rented housing; and 160,000 homeless children living in temporary accommodation.”

Written Ministerial Statement – Social and Affordable Housing Renewal (2nd July 2025)

- 8.12 This statement by the Minister of State for Housing and Planning, Matthew Pennycook, **[CD 5.15]** again referenced the Government’s “commitment to delivering the biggest increase in social and affordable housebuilding in a generation”.
- 8.13 The statement also states that “Ending England’s acute and entrenched housing crisis will be a painstaking and laborious effort that will require focus, energy, and determination over many years.”

Affordable Housing Need

- 8.14 The Council’s affordable housing need is considerable, and the Council’s own evidence base identifies a need for significantly more affordable housing delivery than has been the case.
- 8.15 The Council’s Local Plan identifies a number of key issues, with KI7 stating that “there is a particular need across the plan area to provide affordable housing”.
- 8.16 Paragraph 5.149 of the Local Plan states:
- “Affordable Housing is a key issue in the Local Plan area due in part to the high cost of houses, and the relative low incomes of resident based employment. Both the Housing Needs Survey and the Housing Market Assessment suggest that there is a significant need to increase the overall level of affordable housing provision. The Housing Needs Survey indicated a need of between 443 and 591 per annum for new affordable dwellings to meet backlog and emerging needs. The 2014 SHMA indicates that there is a net need of 526 per annum for affordable housing across the Borough.”*
- 8.17 The Council’s Local Plan therefore identifies a need for 526 affordable homes per annum.
- 8.18 More recently, the High Peak Housing and Economic Land Needs Assessment (September 2022) **[CD 6.2]** identifies a total affordable housing need in the range of 228 to 270 affordable homes per annum across the period of 2021 to 2041. This constitutes a significant proportion of both the Local Plan housing requirement and Local Housing Need based on the standard method.
- 8.19 The Council’s Housing Strategy 2025 – 2030 **[CD 6.13]** advises that there are 1,310 households registered on Home Options (as of 31st January 2024), which is the Council’s database of properties from local housing associations and council-owned homes. It also identifies that during 2022/23 there were 359 homeless households.
- 8.20 The High Peak Borough Plan 2023-2028 (refreshed April 2026) **[CD 6.15]** advises that the “net annual need for affordable housing for High Peak has been estimated to be between 228 and 270 dwellings”.
- 8.21 The level of affordable housing required is therefore a significant proportion of the LHN figure. Against this identified need, the Council’s overall housing delivery over the last two years has been below the

identified annual affordable housing need, and the historical delivery rates (as shown in Table 1 above) show that overall delivery has been deficient and insufficient to deliver the necessary level of affordable housing. Whilst overall housing delivery is below the Local Housing Need, the level of affordable housing delivery is also far below the requirement identified by the Council.

Affordable Housing Delivery

- 8.22 The Council's Annual Monitoring Report (2024-2025) **[CD 6.17]** indicates that over the last nine-year period, 647 affordable homes have been delivered, and for the most recent three-year period, affordable housing delivery was significantly below the identified requirement, with the three-year total failing to meet the minimum annual requirement for affordable housing identified in the HELNA, as set out in **Table 4** below.

Table 4: Affordable Housing Completions

Year	Affordable Housing Completions
2022-23	108
2023-24	49
2024-25	54
Total	211

- 8.23 Taking the lowest annual affordable housing figure identified in the HELNA **[CD 6.2]** (228 dwellings per annum), the three-year requirement would be 684 affordable homes, whereas the actual number of affordable homes delivered amounts to less than one-third of this requirement and across the plan period, only 647 affordable homes have been delivered in total.
- 8.24 There has therefore been a significant under delivery of affordable housing against the identified need.

Affordable Housing Supply

- 8.25 The supply of affordable housing is primarily dependent on delivery through major residential developments, which are subject to a requirement of 30% affordable housing provision, in accordance with local policy.
- 8.26 Given the level of overall housing delivery in recent years, together with the supply identified in the Council's trajectory, there is limited evidence to indicate that affordable housing supply will increase materially over the next five years.
- 8.27 Whilst insufficient information is available to accurately calculate future affordable housing supply for the next five years, applying the policy requirement of 30% affordable housing to the projected supply of major sites identified within the housing trajectory (totalling 779 units) would generate approximately 234 affordable homes over the next five years. This is conservative: it is likely given viability constraints fewer affordable homes would in fact be delivered. In any event, this would meet only the minimum annual level of affordable housing need identified by the Council and therefore demonstrates the limited prospect of making meaningful progress towards addressing affordable housing needs.

Affordable Housing Summary

- 8.28 As a consequence of the continued failure to deliver sufficient affordable housing to meet demand, the Council has a chronic and increasing deficit in affordable housing supply.
- 8.29 The Council's Annual Monitoring Report shows a persistent failure to deliver sufficient affordable housing and to compensate for past under-delivery.
- 8.30 The appeal scheme is made in outline form, it commits to the delivery of 30% affordable housing provision on-site, which would equate to 30 affordable dwellings.
- 8.31 In the context of the Council's severe five-year housing land supply position, the delivery of up to 30 affordable dwellings as part of this proposal is considered to be a material benefit of the scheme which would make a valuable contribution towards the Council's requirements and should be afforded significant weight in the planning balance.

9. HOUSING SUPPLY

- 9.1 Based on the trajectory detailed within the Council's 5YHLS statement prepared for this appeal, **Table 5** sets out the Council's anticipated housing supply rates for large sites with planning permission (Category A sites).

Table 5: Council's Anticipated Housing Delivery Rates

Year	Total Completions (net)
2025/26	37
2026/27	123
2027/28	146
2028/29	62
2029/30	0
Total	368

- 9.2 For sites benefiting from a Local Plan allocation and planning permission (Category B sites), the housing trajectory detailed in the Council's 5YHLS statement is as set out in **Table 6** below.

Table 6: Housing Trajectory detailed in Council's 5YHLS

Year	Total Completions (net)
2025/26	119
2026/27	216
2027/28	205
2028/29	143
2029/30	87
Total	770

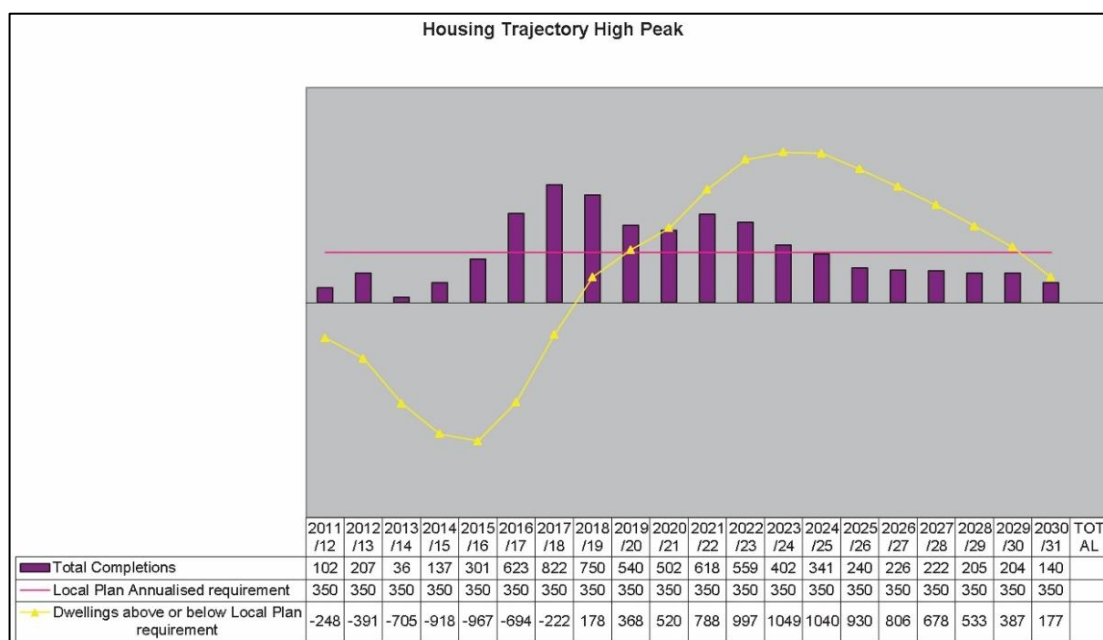
- 9.3 Setting aside small sites and windfall sites, and looking at the trajectory for large sites with permission and allocated sites, as included within the Council's 5YHLS statement, housing delivery would be equivalent to 37% of the five-year requirement (**Table 7**).

Table 7: Total Projected Completions (allocated sites and large sites with permission)

Year	Total Completions (net)
2025/26	156
2026/27	339
2027/28	351
2028/29	205
2029/30	87
Total	1,138

- 9.4 The 5YHLS trajectory demonstrates an underperformance against the Local Plan strategic housing policy and against the housing trajectory set out in Appendix 2 of the Local Plan **[CD 6.1]**, which provides a graph and table indicating the anticipated completions, requirement and delivery above or below the Local Plan requirement. This trajectory is provided as **Figure 1** below.
- 9.5 Table 9 of the Council's latest AMR (2024-2025) **[CD 6.17]** shows that a total of 3,699 dwellings have been completed across the plan period from 2011/12 to 2024/25, as discussed at Paragraph 4.5 and illustrated within **Table 1** above.
- 9.6 The Local Plan sets an annual housing target of 350 dwellings per annum, which would equate to a need for 4,900 dwellings across the same period. There has therefore been a shortfall of 1,201 across this period, equivalent to only 75% of the Local Plan's housing target being met.

Figure 1: High Peak Local Plan Housing Trajectory



- 9.7 The Council's Local Plan sets out in Policy S3 that large, allocated sites are expected to deliver the majority of the Council's housing delivery, with allocations expected to deliver between two to three times as many new homes as smaller sites.
- 9.8 Policy S3 sets a target of 27-35% (958-1,242 dwellings) of the Borough's total housing supply being delivered in the Glossopdale Sub-Area, with 558-842 of those dwellings being delivered on allocated sites.
- 9.9 Based on a review of the Government's 'Live tables on housing supply: indicators of new supply', Table 253 ([Table 253: permanent dwellings started and completed, by tenure and district](#)) **[CD 13.9]** sets out the permanent dwellings started and completed for High Peak, with **Table 8** below providing an overview of recent years.

Table 8: Overview of Number of Starts 2020/21 – 2025/26

Year	Total Starts
2020-21	310

2021-22	260
2022-23	230
2023-24	200
2024-25	170
2025-26	110

- 9.10 As shown in **Table 8** above, the number of housing starts has been in steady decline over recent years. The effects of this are reflected in the total housing delivery figures set out in Table 1, which shows a corresponding decline in completions, with a lag of 1-2 years behind starts.
- 9.11 This evidence therefore shows a sustained year-on-year decline in both housing starts and housing delivery. Given the continued reduction in housing starts over recent years, it is reasonable to expect that the number of dwellings completed will continue to decline in the coming years.
- 9.12 In this context, the Council's Housing Delivery Test results are expected to fall significantly from the 153% result in the 2023 HDT. Given the typical lag between starts and completions, this trend provides clear evidence that housing delivery will continue to decline over the next few years. The Council's trajectory is therefore overly optimistic and not supported by market evidence.
- 9.13 Based on the Council's figures provided within Table 9 of the AMR 2025 and assessed against the standard method requirement of 609 dpa, the delivery rate has decreased from 72% in 2022/23 to 33% in 2024/25. Using the AMR data (Table 9) for the last three-year period and the Standard Method housing requirement, indicates that only approximately 50% of the necessary housing requirement has been delivered across High Peak.
- 9.14 The AMR also provides a breakdown of housing delivery by sub-area. For the Glossopdale Sub-Area, the figures are particularly stark, with delivery falling from 115 dwellings in 2022/23 to just 7 dwellings in 2024/25.
- 9.15 As noted above, the Council's Local Plan seeks to direct 27-35% of all housing growth to the Glossopdale Sub-Area. Local Plan Policy S2 (Settlement Hierarchy) seeks to direct development to the most sustainable locations, with Glossop identified as a Market Town, which are the main focus for housing and future growth.
- 9.16 The Local Plan therefore clearly aims to focus development on the main market towns, which includes Glossop. Housing delivery in the Glossopdale sub-area in particular has seen considerable decline in the last few years resulting in only 7 completions in 2024/25 which is far below the Council's target.

Summary of HPBC's Five-Year Housing Land Supply Position

- 9.17 As noted above, the Council's updated 5YHLS statement **[CD 13.4]** prepared in respect of this appeal applies a base date of 1st April 2025 and identifies an annual housing requirement of 567 dwellings (before 5% buffer), which is detailed in **Table 9** below for ease of reference.

Table 9: High Peak Borough Council's 5YHLS position as of 1st April 2025

Annual Housing Requirement (Standard Method)	567
5 Year Requirement (5 x 567)	2,835
5% Buffer	142
Total 5 Year Requirement	2,977
Annual Requirement	595
Deliverable Supply	1,472
Five-Year Supply	2.47 years

9.18 I do not consider this assessment to be an accurate position for the determination of this appeal.

Housing Supply Scenarios

9.19 The following sections consider four scenarios relating to the Council's annual housing requirement and five-year supply:

- Scenario 1: Base date of 1st April 2026, including the Appellant's position on deliverable supply
- Scenario 2: Base date of 1st April 2026, including the Council's position on deliverable supply
- Scenario 3: Base date of 1st April 2025, including the Appellant's position on deliverable supply
- Scenario 4: Base date of 1st April 2026, including the Appellant's position on deliverable supply with 20% buffer

9.20 The table below provides a summary of the four scenarios, setting out the base date used for the calculation, and whether the scenario is based on the Council's list of deliverable sites or those considered deliverable by the Appellant, together with the buffer applied, and the resulting five-year supply.

Table 10: Summary of Five-Year Housing Land Supply Scenarios

Scenario	Base Date	Site Deliverability Position	Buffer	Five-Year Supply
Scenario 1	1st April 2026	Appellant	5%	1.89
Scenario 2	1st April 2026	Council	5%	2.16
Scenario 3	1st April 2025	Appellant	5%	1.93
Scenario 4	1st April 2026	Appellant	20%	1.67

Scenario 1: 5YHLS Position as of 1st April 2026 using Appellant's position on deliverable supply

9.21 This scenario is considered to reflect the most realistic, up-to-date, and policy-compliant assessment of supply. It applies a base date of 1st April 2026 and applies the most recent available data to calculate the LHN.

- 9.22 On this basis, using the most up-to-date housing stock and affordability ratio with a base date of 1st April 2026, the annual housing requirement and five-year supply would be as set out in **Table 11** below.

Table 11: 5YHLS position based on 1st April 2026 and Appellant's deliverable sites

Annual Housing Requirement (Standard Method)	580
5 Year Requirement (5 x 580)	2,900
5% buffer	145
Total 5 Year Requirement	3,045
Annual Requirement	609
Deliverable Supply	1,149
Five-Year Supply	1.89 years
Surplus / Shortfall against five-year supply	-1,896

Scenario 2: 5YHLS Position as of 1st April 2026 using Council's position on deliverable supply

- 9.23 This second scenario uses the same base date of 1st April 2026, but calculates the supply based on the Council's list of deliverable sites, which includes sites that the Appellant does not agree meet the definition of deliverable. Year 1 sites have been removed from this scenario to reflect the base date moving from 1st April 2025 to 1st April 2026.
- 9.24 It is intended to show that when applying the most recent base date and accepting the Council's assumptions on site deliverability, the five-year supply still falls below the five-year requirement and the position advanced by the Council in their 5YHLS prepared in support of this appeal.

Table 12: 5YHLS position based on 1st April 2026 and Council's deliverable sites

Annual Housing Requirement (Standard Method)	580
5 Year Requirement (5 x 580)	2,900
5% buffer	145
Total 5 Year Requirement	3,045
Annual Requirement	609
Deliverable Supply	1,316
Five-Year Supply	2.16 years
Surplus / Shortfall against five-year supply	-1,729

Scenario 3: 5YHLS Position as of 1st April 2025 using Appellant's position on deliverable supply

- 9.25 This scenario sets out the Appellant's position against a base date of 1st April 2025, as used by the Council, and calculated using the supply of sites that the Appellant considers to meet the definition of deliverable.

- 9.26 This scenario shows that the Council's supply is overly optimistic through the inclusion of sites which are not deliverable.

Table 13: 5YHLS position based on 1st April 2025 and Appellant's deliverable sites

Annual Housing Requirement (Standard Method)	567
5 Year Requirement (5 x 567)	2,835
5% Buffer	142
Total 5 Year Requirement	2,977
Annual Requirement	595
Deliverable Supply	1,149
Five-Year Supply	1.93 years
Surplus / Shortfall against five-year supply	-1,828

Scenario 4: 5YHLS Position as of 1st April 2026 using Appellant's position on deliverable supply and applying 20% buffer

- 9.27 This scenario applies the appellant's deliverability position against a base date of 1st April 2026 and with the application of a 20% buffer.
- 9.28 The 20% buffer is applied in this scenario as a means of illustrating the effect on five-year supply in the event that the 2024 and 2025 Housing Delivery Test results show delivery falling below the 85% threshold below which the 20% buffer must be applied.
- 9.29 The 2024 and 2025 HDT results are expected to be published by the Government in the near future and, as discussed at paragraph 4.5, based on the Council's latest Annual Monitoring Report and the data contained within **Table 1**, housing completions have been equivalent to approximately 50% of the housing need over the last three-year period.

Table 14: 5YHLS position based on 1st April 2026, Appellant's deliverable sites, and 20% buffer

Annual Housing Requirement (Standard Method)	580
5 Year Requirement (5 x 580)	2,900
20% buffer	580
Total 5 Year Requirement	3,480
Annual Requirement	696
Deliverable Supply	1,149
Five-Year Supply	1.65 years
Surplus / Shortfall against five-year supply	-2,331

Summary

- 9.30 I have carried out an assessment of four scenarios to analyse the effects on the five-year housing land supply resulting from the use of different base dates, 5% or 20% buffer, and against a list of sites considered deliverable by either the Council or Appellant.
- 9.31 The change in base date has a relatively small effect on the LHN figure due to changes in the existing housing stock and affordability figures, resulting in a higher annual housing requirement and a corresponding decrease in five-year supply for the 2026 base date. However, the change in base date and amendments to delivery trajectory have more considerable effects on the five-year supply.
- 9.32 **Table 15** below provides a comparison of the Council and Appellant's positions in relation to housing land supply. The Appellant's position is that set out in Scenario 1 above, based on a base date of 1st April 2026 and with the sites listed in this chapter removed from the supply.

Table 15: Council and Appellant's Positions in relation to Housing Land Supply

	Council's Position	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Base Date	1st April 2025	1st April 2026	1st April 2026	1st April 2025	1st April 2026
Annual Housing Requirement (Standard Method)	567	580	580	567	580
Five-Year Requirement	2,835	2,900	2,900	2,835	2,900
Total Five-Year Requirement (inc. 5% / 20% buffer)	2,977	3,045	3,045	2,977	3,480
Annual Requirement	595	609	609	595	696
Deliverable Supply	1,472	1,149	1,316	1,149	1,149
Five-Year Supply	2.47 years	1.89 years	2.16 years	1.93 years	1.65 years
Shortfall	-1,505	-1,896	-1,729	-1,828	-2,331

- 9.33 The deliverable supply of 1,149 dwellings identified in the assessment above contrasts with the Council's stated supply of 1,472 dwellings. The supply identified above equates to a 1.89-year land supply against the Council's stated 2.47-year supply.
- 9.34 The above calculations for Scenarios 1-3 have been based on a housing requirement with 5% buffer. However, as noted above, based on the Council's recent housing delivery, as set out in the Council's AMR, housing delivery is expected to drop significantly when the latest Housing Delivery Test results are published and is expected to be approximately 50% of the housing requirement.
- 9.35 If, as expected, the HDT result is less than 85%, then a 20% buffer would need to be applied. **Table 16** below shows the consequences of the 20% buffer in respect of the five-year supply.

Table 16: Consequences of the 20% Buffer in respect of the Five-Year Supply

	Potential Position
Five-year requirement (inc. 20% buffer)	3,480

Deliverable Supply	1,149
5YHLS	1.65 years
Shortfall	-2,331

- 9.36 In the event that the Council's Housing Delivery Test result falls below 85%, the 20% buffer would therefore be applicable, and would result in a five-year requirement of 3,480 versus the current requirement of 3,045. This would result in a reduction in the five-year supply from 2.47 years (as identified by the Council) to **a five-year supply of only 1.65 years**.
- 9.37 In all four of the scenarios detailed above, the Council is unable to demonstrate a five-year supply, with the Appellant identifying a worse situation than has been advanced by the Council, with a total five-year supply of only 1.89 years.

Appeal Decisions and the Weight afforded to housing provision

- 9.38 The Secretary of State has determined many applications where the weight afforded to the provision of housing and affordable housing has been considered. **Table 17** below provides a summary of the weight afforded under various recent appeal decisions.
- 9.39 It is clear from national planning policy and these appeal decisions that the provision of housing attracts a substantial, significant, very substantial, or very significant degree of weight in the planning balance, particularly when councils are unable to demonstrate a five-year housing land supply.

Table 17: Summary of weight afforded under various recent appeal decisions

Decision	Weight afforded to housing	Weight afforded to affordable housing	5YHLS position
APP/U2750/W/25/3371863 [CD 7.19] Highfield Meadows, Land East of Rainbow Lane, Peasey Hills, Malton, YO17 7AF	Very Significant	Very Significant	0.8 years
APP/N0410/W/24/3347882 [CD 7.20] Land at Broad Lane, Holtspur, Beaconsfield, HP9 1UB	Substantial	Substantial	0.9 years
APP/N0410/W/25/3374132 [CD 7.21] Land Adjacent to Amersham Road and Minerva Way (Beeches Park), Beaconsfield, Buckinghamshire	Very Significant	Very Significant	0.91 years
APP/N1920/W/25/3374962 [CD 7.22] Land South of Shenley Hill, Radlett WD7 7EL	Very Substantial	Very Substantial	0.98 years
APP/V4630/W/25/3369937 [CD 7.23] Land West of Longwood Lane, Walsall	Very Significant	Significant	1.01 – 1.97 years

Decision	Weight afforded to housing	Weight afforded to affordable housing	5YHLS position
Land to the West of Burley-in-Wharfedale (ref: 3208020) [CD 7.24]	Very Substantial		<2.06
160 Stanley Road, Stockport (ref: 3205559) [CD 7.25]	Very Significant		2.8
APP/F1040/W/25/3368728 [CD 7.26] Land South of Kings Newton Lane, Melbourne	Substantial	Very Substantial	3.4 years
APP/D2320/W/25/3376957 [CD 7.27] Former Camelot Theme Park, Park Hall Road, Charnock Richard, Lancashire, PR7 5LP	Substantial	Very Substantial	3.4 years
APP/C1570/W/25/3370631 [CD 7.28] Land off Bedwell Road, Elsenham, CM22 6JQ	Substantial	Substantial	3.42 – 3.46 years
APP/Q3115/W/25/3370273 [CD 7.29] Land off the B480, Chalgrove OX49 5BA	Very Significant	Substantial	3.64 – 3.81 years
APP/W2845/W/25/3367158 [CD 7.30] Land to the west of Brackley, Brackley, NN13 6FA	Very Significant	Substantial	3.89 years
APP/J0405/W/25/3372565 [CD 7.31] Land South Of Bourton Road, Bourton, Buckingham.	Very Substantial	Substantial	3.9 years
Land North of Viaduct, Ledbury (ref: 3244410) [CD 7.32]	Substantial	Substantial	4.22

10. FUTURE PROSPECTS FOR HOUSING DELIVERY

- 10.1 It is clear that housing delivery rates have been declining in recent years, alongside a reduction in new housing starts. This trend is likely to result in continued under-delivery against housing targets.
- 10.2 This position is compounded by the Council's Local Plan context. The adopted High Peak Local Plan is now more than ten years old (adopted on 14th April 2016), and preparation of a replacement Local Plan is significantly delayed.
- 10.3 The Local Development Scheme published in February 2025 **[CD 6.11]** (in effect at the time of the planning application submission and determination) indicates that the Council has not progressed beyond the early engagement carried out between January – March 2023. A Preferred Options Consultation was scheduled for Spring 2025, Proposed Submission Consultation for Winter 2025, and Submission of the Local Plan in Spring 2026; however, none of these milestones have been met and progress against this timetable is now significantly delayed.
- 10.4 The Council has subsequently updated the LDS (published on 6th March 2026) **[CD 6.12]**, reflecting a shift to the new plan-making regulations. This sets out a timetable for a Regulation 18 consultation in Q1 2026. To date, this has not begun and the Council is therefore 3 months behind even this latest LDS.
- 10.5 The NPPF requires LPA's to proactively monitor, update, and maintain a five-year housing land supply, stating that:

"Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old."
- 10.6 The Council has failed to identify and update annually the necessary supply of deliverable sites and does not have an up-to-date Local Plan.
- 10.7 There is no credible basis to conclude that housing delivery will improve in the short term. On the contrary, all available indicators, declining starts, falling completions, and slow progress on key sites, point towards continued under-delivery.
- 10.8 This position is compounded by significant delays in the preparation of a new Local Plan. The Council is materially behind its own timetable, with no clear prospect of adoption within the relevant period.
- 10.9 As there is no emerging Local Plan capable of allocating new, deliverable sites in the short term, the Council has limited means to materially increase housing building. In light of the delays in the plan-making process, lack of five-year housing land supply, and anticipated HDT failure in the near future, the deficit is likely to continue for the foreseeable future.
- 10.10 As such, the council cannot provide a plan-led solution, nor can they demonstrate an up-to-date five-year supply, and it is expected that the upcoming HDT results will show an under delivery against housing requirements, such that a 20% buffer would be applicable. On this basis, there is no realistic mechanism by which the identified shortfall will be addressed, further reinforcing the weight to be given to sustainable development proposals.

11. CONCLUSION

- 11.1 In conclusion, the Council accepts that it cannot demonstrate a five-year supply of deliverable housing sites. The Appellant's evidence shows that the position is materially worse than acknowledged, with a supply of 1.89 years and potentially as low as 1.65 years, as set out in **Table 18** below.

Table 18: Council and Appellant's Positions in relation to Housing Land Supply

Base Date	1st April 2025	1st April 2026	1st April 2026	1st April 2025	1st April 2026
Annual Housing Requirement (Standard Method)	567	580	580	567	580
Five-Year Requirement	2,835	2,900	2,900	2,835	2,900
Total Five-Year Requirement (inc. 5% / 20% buffer)	2,977	3,045	3,045	2,977	3,480
Annual Requirement	595	609	609	595	696
Deliverable Supply	1,472	1,149	1,316	1,149	1,149
Five-Year Supply	2.47 years	1.89 years	2.16 years	1.93 years	1.65 years
Shortfall	-1,505	-1,896	-1,729	-1,828	-2,331

- 11.2 Irrespective of which position is used, there is a significant deficit in the Council's housing land supply of at least 50%. Notwithstanding this, I conclude that the Council's position is inaccurate and should not be used.
- 11.3 The Appellant's position, set out in Scenario 1, applies an up-to-date base date and associated housing and affordability data to calculate the Local Housing Need and supply position.
- 11.4 The Council's latest position statement, prepared in response to this appeal, is that there is a deliverable housing land supply of 2.47 years. The Appellant's position is that the supply is 1.89 years. The difference in positions results from the base date used for calculations and the deliverability of several sites included within the housing supply.
- 11.5 The analysis above demonstrates that there is significant unmet need for housing and a significant undersupply in future years, which is unlikely to be satisfactorily addressed through the Local Plan in the short term.
- 11.6 The findings represent a severe and worsening shortfall, engaging the tilted balance in paragraph 11(d) of the NPPF.
- 11.7 In these circumstances, the need to significantly boost the supply of housing, particularly in the context of persistent under-delivery, attracts substantial weight in favour of the appeal proposal.

- 11.8 Table 17 and Paragraphs 9.38 and 9.39 set out a number of appeal decisions and the weight afforded to market and affordable housing delivery in recent appeal decisions. These show that in cases where supply has been below 3 years, the weight afforded is generally 'very significant', 'substantial', 'significant', or 'very substantial'. I consider that this appeal scheme should be afforded a similarly high degree of weight, reflective of the severity of the housing supply position and the contribution that the site could make towards meeting local housing need.

APPENDIX 1 – RICHARD HOLLIDAY CV



Richard Holliday MRTPI

Associate Partner

Leeds

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Richard is a chartered town planner with over 18 years' experience in the planning sector. He works with a diverse client base which includes developers, landowners, government agencies, and public and private companies. He manages the planning process from site promotion, pre-application, application, and post-decision matters for a broad range of developments including residential, education, health care, commercial, and leisure.

Primary Skills

Richard has significant experience within the public and private sector, providing him with the ability and knowledge to guide and assist clients through the planning process. He advises a range of clients on all elements of the planning process, including undertaking initial site appraisals, preparation of planning strategy advice, preparation and submission of Local Plan representations, pre-application enquiries, planning and listed building consent applications, post-decision negotiations and appeals, and advising on planning enforcement matters.

Richard brings significant local authority experience from his previous positions at both Kirklees Council and Bradford Council, latterly as a senior officer in a major developments team, where he managed a varied caseload of major development proposals, including large and complex residential, commercial, industrial, and mixed-use developments. This experience included work on pre-application, application, and post-decision matters and appeals, as well as advising on the preparation of development plan and design guide documents, which provides valuable insight when dealing with local planning authorities. He is also highly skilled and experienced in presenting at planning committee and to a variety of stakeholders.

Examples of Experience

*Project experience prior to Carter Jonas

Mace & Department for Education

Richard works with Mace and the Department for Education providing planning strategy advice and guidance on the redevelopment and refurbishment of schools and the provision of new schools as part of the DfE's School Rebuilding Programme and Free Schools Programme. Richard's involvement includes leading the preparation, submission, and negotiation of pre-application enquiries and planning application submissions, and undertaking planning appraisals on behalf of the client to inform future development proposals.

Leeds Teaching Hospitals NHS Trust (LTHT)

Advising LTHT and providing detailed strategic planning advice covering the Trust's estate and various landholdings, including preparation and submission of planning applications, and advising the Trust on developments across their estate, including advising on and delivering planning permission for development of new medical facilities and upgrades to existing buildings within the wider estate, such as the new Rob Burrow MND Centre.

Derbyshire County Council

Working with the Council as landowner to advise on planning matters relating to their landholding and managing the preparation, submission, and negotiation of planning applications for redevelopment of vacant sites and representations through Call for Sites, prior to site disposal. This work involves managing project teams and responding to complex site constraints, public consultations, Design Review, and negotiations with LPAs.

Private Landowner

Provide ongoing planning advice to a landowner with significant landholdings across Kirklees, which requires close liaison with the Council's planning team to ensure the client's interests are promoted and to maximise opportunities for development and allocation of sites with longer term potential.

Airedale NHS Trust*

Case officer on an application for Airedale NHS Trust for the provision of a new hospital building on the existing hospital site to provide a new procedure suite, operating theatres, and other ancillary works to facilitate expansion of the healthcare facilities and upgrade of operating theatres.

Private Developer – Saltaire, Bradford*

Acted as planning officer for planning proposals for a mixed-use scheme involving the redevelopment of the former HMRC site in Saltaire, Bradford. The project involved the demolition of a significant office building, ancillary buildings and facilities, advising on matters relating to potential listing by Historic England and securing a Certificate of Immunity from Listing, and advising on the subsequent redevelopment proposals, which consisted of approximately 300 dwellings, office space, and other ancillary uses, on a site constrained by a UNESCO World Heritage Site, conservation area, listed buildings, flood risk, ecology, access, and other planning policy matters.

Rudding Park, Harrogate

Working closely with the owners of Rudding Park to provide strategic planning advice and deliver planning permissions for a long-term investment strategy for the redevelopment of the driving range and golf club, and new facilities including a country club, tennis facilities, a family facility, and restoration and improvement works to the Registered Park's heritage assets and special landscape, and extensive biodiversity net gain proposals.

Private Developer – Bradford City Centre*

Case officer for a planning application relating to the restoration and conversion of a derelict city centre listed former warehouse and mill building into 110 residential apartments, along with associated listed building consent and approvals required under a Local Development Order. The project involved working closely with a private developer and architect to secure appropriate re-use of the listed building.

Site Promotion – Kirklees Council, Leeds City Council, Sheffield City Council, and North Yorkshire Council Local Plans

Advised a range of clients including landowners, developers and government agencies on the Local Plan process and managed the submission of approximately 80 sites through various Councils' Call for Sites and public consultations, as well as representing clients at Local Plan examinations. Richard also works with North Yorkshire Council as part of its Local Plan Strategic Housing and Employment Land Availability Assessment (SHELAA) Working Group.

Incommunities – Various Residential Developments, Bradford*

Acted as case officer on several sites owned by Incommunities, a Registered Social Landlord, to provide pre-application advice and subsequently negotiate and determine planning applications and post-decision matters in respect of several sites including those in the city of Bradford, which collectively involved demolition of a total of eleven residential tower blocks and construction of approximately 200 dwellings.

Private Landowner – Ledston Hall

Providing planning advice to the client in respect of restoration works, new build development, and conversion of a derelict and dilapidated Grade I listed building set within a Registered Park and Garden. Negotiation with the LPA in respect of a series of applications for planning and listed building consent and subsequent post-decision approvals to assist the restoration and re-use as residential units.

*Project experience prior to Carter Jonas

Qualifications

Member of the Royal Town Planning Institute (MRTPI)

MA Town and Regional Planning – Leeds Beckett University

BSc (Hons) Geography – Queen Mary University of London

Career

2025 – Present: Associate Partner, Carter Jonas, Leeds

2022 – 2025: Associate, Carter Jonas, Leeds

2018 – 2022: Senior Planning Officer (Major Developments), Bradford Council

2008 – 2018: Planning Officer, Bradford Council

2013 – 2014: Planner (secondment), Kirklees Council
