

From: [Alan Corinaldi-Knott](#)
To: [Programme Officer](#)
Subject: Written Statement to the SMDC Local Plan Additional Hearing Sessions
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Attachments: [image001.png](#)
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Dear Joanne

I am writing to you on behalf of Harlequin Development Strategies to confirm that we will not be submitting additional hearing statements for the purposes of the forthcoming hearing sessions and will largely be relying upon the submissions already made to date.

However, with regard to Matter 2 (Housing Land Supply Update) we would like to bring to the Inspector's attention the recent High Court judgement in the matter of *Compton Parish Council (and others) vs Guildford Borough Council and the Secretary of State for Housing, Communities and Local Government [2019] EWHC 3242 (Admin)*

A copy of this judgement is attached.

This relates to the submissions that we have previously made in that insufficient sites have been identified to meet housing needs.

The court judgement confirms that once meeting the OAN is accepted as a strategic level factor contributing to exceptional circumstances for releasing Green Belt land, it follows that the provision of headroom against slippage and for flexibility to meet changes in future circumstances would contribute to such circumstances. It is considered that such an approach is warranted in Staffordshire Moorlands for the reasons already highlighted in our submissions relating to the Housing Trajectory, the 5 year housing land supply, and the Housing Implementation Strategy. Our position is that insufficient deliverable sites have been identified and additional sites should be considered for allocation.

I would be grateful if you could forward this judgement and the commentary above to the Inspector and also make it available on the Examination Library page of the SMDC web site.

Regards

Alan Corinaldi-Knott
Associate

Knights plc