

CD6.3

Tetlow King
PLANNING

Affordable Housing Proof of Evidence of James Stacey BA (Hons) DipTP MRTPI

Land South of Barrow Green Road, Oxted

Affordable Housing Proof of Evidence of James Stacey BA (Hons) DipTP MRTPI

Outline application for a residential development of up to 190 dwellings (including affordable homes) (Use Class C3), an extra care facility with up to up 80 beds (Use Class C2), together with the formation of vehicular access, landscaping, parking, open space, green and blue infrastructure, and all other associated development works. All matters reserved except access

Land South of Barrow Green Road, Oxted

Croudace Homes Ltd

December 2025

PINS REF: APP/M3645/W/25/3372747

LPA REF: 2025/245

OUR REF: M25/1019-01.RPT

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Core Documents

- CD3.1 Ref: 2025/245 Officer's Report
- CD3.3 Ref: 2025/245 Decision Notice (15 August 2025)
- CD4.1 TDC Core Strategy 2006-2026 (adopted 2008)
- CD4.8 TDC Corporate Plan 2024 to 2028
- CD4.9 TDC Housing Strategy 2019-2023
- CD4.10 TDC Homelessness Prevention and Rough Sleeping Strategy 2019-2023 (extended to 2025)
- CD4.11 East Surrey Strategic Housing Market Assessment (April 2008)
- CD4.12 TDC Affordable Housing Needs Assessment Technical Paper (September 2015)
- CD4.13 TDC Affordable Housing Needs Assessment Updated Technical Paper (June 2018)
- CD4.14 TDC Authority Monitoring Report 2023/24 (May 2024)
- CD4.17 Inspector's Report on the Examination of the Core Strategy (2008)
- CD4.25 Report on the Examination of the Tandridge District Council Our Local Plan: 2033
- CD5.1 National Planning Policy Framework (12 December 2024)
- CD7.1 TDC Statement of Case
- CD8.1 Rule 6 Statement of Case
- CD9.3 Appeal Decision: Land at Sondes Place Farm, Westcott Road, Dorking (December 2023)
- CD9.4 Appeal Decision: North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham (July 2019)
- CD9.6 Appeal Decision: Oving Road, Chichester (August 2017)
- CD9.7 SoS Appeal Decision: Oxford Brookes, Wheatley (April 2020)
- CD9.8 SoS Appeal Decision: Franklands Drive, (2006)
- CD9.9 Appeal Decision: Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (January 2022)
- CD9.10 Appeal Decision: Land to the west of Langton Road, Norton (September 2018)
- CD9.11 Appeal Decision: Coombebury Cottage, Dunsfold (May 2024)
- CD9.12 Appeal Decision: Firlands Farm, Hollybush Lane, Burghfield Common, Reading, Berkshire (July 2015)
- CD9.13 Appeal Decision: Land at Mans Hill, Burghfield Common (March 2015)
- CD9.14 Appeal Decision: Land to the East of Highgate Hill and South of Copthall Avenue, Hawhurst, Kent (March 2022)
- CD9.29 Appeal Decision: Land off Aviation Lane, Burton-upon-Trent (October 2020)
- CD9.30 Appeal Decision: Bullens Green Lane, Colney Heath (June 2021)
- CD9.31 Appeal Decision: Land South of Shenley Road, Radlett (January 2024)
- CD9.32 Appeal Decision: Land lying to the east of Hartfield Avenue and fronting on to Barnet Lane, Elstree, Hertfordshire (March 2024)
- CD9.33 Appeal Decision: Land West of Limpsfield Road, Warlingham CR6 9RD (April 2023)
- CD9.34 Appeal Decision: Land at Grove End, Bagshot (March 2025)
- CD9.35 Appeal Decision: Land at Little Bushey Lane, Bushey (July 2023)
- CD9.36 Appeal Decision: Land at Witney Road, Ducklington (January 2023)
- CD9.37 Appeal Decision: Maitland Lodge, Billericay (November 2022)
- CD11.1 "Building the Homes We Need" Written Ministerial Statement (30 July 2024)

- CD11.2 Building the Homes We Need" Written Ministerial Statement (13 December 2024)
- CD11.3 "Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing" Written Ministerial Statement (12 February 2025)
- CD12.1 Children's Commissioner Report "Bleak Houses: Tackling the Crisis of Family Homelessness in England" (August 2019)
- CD12.2 Shelter "Denied the Right to a Safe Home – Exposing the Housing Emergency" (May 2021)
- CD12.3 Shelter "Unlocking Social Housing: How to fix the rules that are holding back building" (April 2022)
- CD12.4 Shelter "Briefing: Cost of Living Crisis and the Housing Emergency" (September 2022)

Executive Summary / Summary Proof of Evidence

- i. This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in the planning decision in light of the evidence of need in the Tandridge District Council area.
- ii. Outline planning permission is sought for up to 190 dwellings, of which 50% (up to 95 dwellings) are to be provided on-site as affordable housing. This level of provision exceeds the requirements of Policy CSP4 of the Core Strategy 2006-2026 (adopted October 2008). The proposal meets the Golden Rules test, as set out in Paragraphs 157 and 158 of the Framework.
- iii. The proposed tenure split will be determined at Reserved Matters stage but will reflect the requirements of relevant local and national policy and guidance adopted at that time.
- iv. The affordable housing provision will be secured through a Section 106 agreement.

Key Findings

Corporate Documents

- v. Corporate documents identify the delivery of affordable housing as a high corporate priority of Tandridge District Council. These include the Corporate Plan 2024-2028 and the Homelessness and Rough Sleeping Prevention Strategy 2019-2023 (extended to 2025).

Affordable Housing Needs

- vi. There are a number of needs assessments. These are not directly comparable. The 2008 SHMA identifies a need for 720 affordable homes per annum between 2008/09 and 2012/13.
- vii. The 2015 AHNA identifies a need for 456 affordable homes per annum between 2015/16 and 2019/20.

viii. The 2018 AHNA identifies a need for 391 affordable homes per annum between 2015/16 and 2019/20 to meet the 'backlog' of need in five years, which falls to 310 affordable homes per annum for period between 2023/24 and 2038/39.

Affordable Housing Delivery

ix. In the 17-year period, for which there is data, since the start of the Core Strategy period in 2008/09, net of Right to Buy affordable housing delivery represented just 22% of overall housing delivery, equating to just 50 affordable dwellings per annum.

Affordable Housing Shortfalls

x. The 2015 AHNA identified a need for 456 affordable homes per annum over the period between 2015/16 and 2019/20, or a total need for the period of 2,280 affordable homes. Over the same period, just 313 affordable homes, net of the Right to Buy were delivered. This represents **a shortfall in delivery of -1,967 affordable homes** against identified needs.

xi. The 2018 AHNA identifies a need for 2,575 affordable homes between 2018/19 and 2024/25, 391 dwellings per annum over the first five years falling to 310 per annum from 2023/24. Between 2018/19 and 2024/25 just 424 affordable homes, net of the Right to Buy, were delivered; **this equates to a shortfall of -2,151 affordable homes** over the period.

xii. This is in this context that the shortfalls in affordable housing delivery against identified needs should be understood. For this reason, it is my opinion that the identified shortfalls should be considered as conservative figures and that were there to be an up-to-date and NPPF compliant assessment of affordable housing need against which delivery could be measured there is a real prospect that the shortfall would be greater.

Affordability Indicators

xiii. The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Tandridge District Council for any household seeking an affordable home:

Housing Register

- On 31 March 2025 there were 1,956 households on the Housing Register. This represents a 7% increase in a single year from 1,835 households MHCLG data shows on 31 March 2024.

- On 20 November 2025 543 registered households indicated they would consider an affordable home in Oxted Civil Parish; this represents 28% of the total housing register.
- Based on the dwelling size, successful applicants in the 2024/25 period experienced average waiting times ranging from 608 days (approximately 1 year and 8 months) to 1,387 days (approximately 3 years and 10 months) for an affordable home. Notably, no affordable homes with four or more bedrooms were advertised in the 2024/25 monitoring year.

Temporary Accommodation

- MHCLG statutory homelessness data highlights that on 31 March 2024, there were 47 households housed in temporary accommodation by the Council, with 55% of these households housed in local authority or Registered Provider stock.
- Of these, 43 households (91%) were households with children. The council has a responsibility to house these households. It is notable that 31 (72%) of the 43 households with children had been in temporary accommodation for more than six months, and 19 (44%) for at least a year.
- MHCLG data indicates that Tandridge spent £1,733,000 on temporary accommodation between 1 April 2023 and 31 March 2024.
- On 17 September 2025 the Regulator of Social Housing published its regulatory judgement for Tandridge District Council along with a grading of C4. C4 is the lowest possible grade and means that the Regulator of Social Housing may directly intervene.

Homelessness

- MHCLG statutory homelessness data shows that in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 170 households in need of homelessness prevention duty¹, and a further 105 households in need of relief duty² from the Council.
- The Tandridge Homelessness Prevention Strategy 2019 to 2023 (extended to 2025) notes that of the four main causes of homelessness in the district, '*The first*

¹ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

² The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

three causes are all symptoms of the acute lack of affordable housing in the district ... [my emphasis]'. These are loss of Assured Shorthold Tenancy (38%), parental eviction (29%) and eviction by a friend or relative (10%).

Private Rental Market

- Office for National Statistics ("ONS") data (first produced in 2014/15) shows that average (mean) private rents in Tandridge stood at £1,545 per calendar month ("pcm") in 2024/25. This represents a 35% increase from 2014/15 where average private rents stood at £1,143 pcm.
- An average rent of £1,545 pcm in 2024/25 is 13% higher than the South East figure of £1,368 pcm and 11% higher than the national figure of £1,386 pcm.

Median House Prices

- The ratio of median house prices to median incomes in Tandridge now stands at **12.98**, an 11% increase since the start of the Core Strategy period in 2008 where it stood at 11.65. A ratio of 12.98 in 2024 stands substantially above the national median of 7.71 (+68%) and significantly above the South East median of 9.61 (+35%).
- Notably the median house price to income ratio in Tandridge increased (+4%) in 2023/24 in stark contrast to the declines observed in England (-8%) and the South East (-9%). The national trend has been for falling ratio's both locally and nationally, demonstrating a more acute problem in Tandridge.
- The median house price across Tandridge has risen by 75% from £279,950 in 2008 to £490,000 in 2025. This figure is strikingly above (63% higher) the national figure of £300,000, which has seen an increase of 67% over the same period and 28% higher than the South East figure of £384,000 which has seen an increase of 74% over the same period.
- The median house price across Oxted North MSOA has risen by 47% from £395,000 in 2008 to £580,000 in 2025. Despite the median house prices in the Oxted North MSOA increasing at a lower rate over the period than those in Tandridge (+75%) and England (+74%) they remain significantly higher.
- In 2025 the median house price in Oxted North MSOA (£580,000) is 18% higher than the figure for Tandridge as a whole (£490,000) and substantially (+51%) higher than the median house price in England (£384,000).

Lower Quartile House Prices

- For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in Tandridge in 2024 stood at **14.94**, a 27% increase since the start of the Core Strategy period in 2008 when it stood at 11.77.
- This means that those on lower quartile incomes in Tandridge, seeking to purchase a property priced in the lower quartile, now need to find almost **15 times their annual income** to do so.
- The lower quartile ratio in Tandridge stands substantially above the national average of 6.79 (+120%) and significantly above the South East average of 9.47 (+58%). It follows that housing in this area is unaffordable for a significant part of the local population.
- The lower quartile ratio between lower quartile incomes and house prices in Tandridge increased 14% in the last twelve months, between 2023 and 2024; this stands in stark contrast with the declining ratios in both the South East (-9%) and England (-9%) over the same period.
- Only 30 of the 318 local planning authorities in England and Wales have seen an increase (worsening) in the lower quartile affordability ratio in the last 12 months, **Tandridge saw the largest increase – i.e. Tandridge was top of the list of authorities where the affordability of housing has worsened.** This again demonstrates an acute problem for those households at the lower end of the house price ladder.
- The lower quartile house price across Tandridge has risen by 78% from £210,941 in 2008 to £375,000 in 2025. This compares to a 71% increase across the South East and a national increase of 58% over the same period.
- In 2025 lower quartile house prices in Tandridge (£375,000) were 32% higher than across the South East (£284,838) and 82% higher than the national figure (£202,000).
- The lower quartile house price across North Oxted MSOA (Tandridge 006) has risen by 59% from £282,500 in 2008 to £450,000 in 2025. This figure is 20% higher than the Tandridge figure of £375,000, (which has seen an increase of 78% over the period) and 58% higher than the South East figure of £284,838 (which has seen an increase of 71% over the period).

The Future Supply of Affordable Housing

- xiv. In the first seven years of the 2018 AHNA period, the Council have overseen the delivery of 424 affordable homes (net of Right to Buy) against a need of 2,575 net new affordable homes, which has resulted in a shortfall of -2,151 affordable homes.
- xv. I consider that any shortfall in delivery should be dealt with within the next five years (Sedgefield approach to removing housing land supply backlogs). This is also an approach set out within the PPG³ and endorsed at appeal.
- xvi. When the shortfall is factored into the need for 310 affordable homes per annum identified by the 2018 AHNA period between 2025/26 and 2029/30, the number of affordable homes the Council will need to complete increases by 139% to 740 net affordable homes per annum over the period. This would ensure that for the remainder of the 2018 AHNA period up to 2038/39 the annual affordable housing need falls back to 310 per annum to deal solely with newly arising need.
- xvii. The evidence demonstrates that Council is highly unlikely to be able to meet its affordable housing needs over the next five years. Generously assuming all sites in the Council's latest supply of 2,170 dwellings as of 1 October 2025 would provide policy compliant levels of affordable housing, there is a possible supply of just 148 new affordable dwellings per annum.
- xviii. If we were to assume that the past gross affordable housing provision of 22% is to be continued over the next five years, this is likely to deliver only 477 affordable dwellings over the period, equating to a much lower affordable housing future supply of just 75 new affordable dwellings per annum.
- xix. These figures fall chronically short of the 740 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and substantially short of the 310 net affordable housing needs per annum identified in the 2018 SHMA.

Conclusion

- xx. In light of the key findings of my evidence and the acute need for affordable housing within Tandridge District Council, I consider that **very substantial weight** should be attributed to the delivery of up to 95 affordable homes through the appeal scheme in the planning balance.

³ Paragraph: 022 Reference ID: 68-031-20190722

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by **James Stacey BA (Hons) DipTP MRTPI** of **Tetlow King Planning (TKP)** on behalf of **Croudace Homes Ltd**, in respect of the appeal 'APP/M3645/W/25/3372747' at Land South of Barrow Green Road, Oxted.
- 1.2 The proposed development is for up to 190 dwellings, of which 50% (up to 95 dwellings) are to be provided on-site as affordable housing. The proposed affordable housing provision (50%) exceeds the cumulative 49% affordable housing provision required under Policy CSP4 of the Core Strategy 2006-2026 (34%) with the (15%) uplift required by the Golden Rules under paragraphs 157 and 158 of the NPPF 2024.
- 1.3 The proposed tenure split will be determined at Reserved Matters stage but will reflect the requirements of relevant local and national policy and guidance adopted at that time. The proposed affordable housing will be secured by way of a Section 106 planning obligation.
- 1.4 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision⁴ considering evidence of need in the area. It should be read alongside the Appellant's Planning Evidence and Housing Land Supply Evidence.
- 1.5 My credentials as an expert witness are summarised as follows:
 - I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England ("UWE") (1997). I am a member of the Royal Town Planning Institute ("RTPI").
 - I have over 30 years professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and been in private practice since 2001.

⁴ For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

- During my career I have presented evidence at more than 160 Section 78 appeal inquiries and hearings. I act for a cross-section of clients and advise upon a diverse range of planning housing related matters.
- In December 2022, I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.
- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plan documents and supplementary planning documents on affordable housing throughout the UK.

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

"The evidence which I have prepared and provide for this appeal in this Statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."

1.7 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper.

1.8 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.9 As part of my evidence, I have sought data from the Council, upon which I rely, through a number of Freedom of Information ("FOI") requests submitted to Tandridge District Council. Responses were received from the Council on 5 August 2025 and a partial response on 21 November 2025. On 24 November a number of clarifications were sought from the Council; the Appellant reserves the right to provide an update in light of any response received from the Council. The full FOI correspondence is attached at **Appendix JS1**.

1.10 This proof of evidence comprises the following ten sections:

- Section 2 establishes the importance of affordable housing as an important material consideration;
- Section 3 considers the consequences of failing to meet affordable housing needs;
- Section 4 analyses the development plan and related policy framework including corporate documents;
- Section 5 sets out the identified affordable housing needs;
- Section 6 examines past affordable housing delivery against identified needs;
- Section 7 covers a range of affordability indicators;
- Section 8 considers the future supply of affordable housing;
- Section 9 sets out the council's and Rule 6's assessment of the application;
- Section 10 identifies the benefits of the proposed affordable housing at the appeal site; and
- Section 11 considers the weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

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

National Planning Policy Framework (12 December 2024) (CD5.1)

2.2 The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-taking processes.

2.3 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) is to "*support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.*" (My emphasis).

2.4 At the heart of the NPPF is the presumption in favour of sustainable development contained at paragraph 11. Under paragraph 11c, proposals which accord with an up-to-date development plan should be approved without delay. Under paragraph 11d, where the most important policies are out of date, permission should be granted unless the policies in the NPPF provide a strong reason for refusal, or where any adverse impacts of the scheme significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.

2.5 The December 2024 revisions to the NPPF expand the decision-taker's assessment under paragraph 11d to have "*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 combination*" (my emphasis). In doing so, the **NPPF now makes affordable housing a central part of**

applying the presumption to which the decision-taker must have particular regard (my emphasis).

2.6 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:

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

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

2.8 Paragraph 63 also makes clear that *“within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing...”* (My emphasis).

2.9 The NPPF places a core responsibility on all major developments (involving the provision of housing) to provide affordable housing. In particular, paragraph 66 establishes that *“where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.”*

2.10 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *“housing for sale or rent, for those whose needs are not met by the market [...] and which complies within one or more of the following definitions”* before identifying four categories of affordable housing: Social Rent in accordance with Government’s conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

National Planning Policy Framework: proposed reforms and other changes to the planning system (16 December 2025)

- 2.11 On 16 December 2025 the Ministry of Housing, Communities, and Local Government opened a consultation on proposed changes to the planning system, including the National Planning Policy Framework. The consultation is scheduled to close at 11:45 on 10 March 2026.
- 2.12 The consultation draft of the revised NPPF is a material consideration but carries limited weight owing to the inherent uncertainty as to whether the consultation draft will be adopted in whole or in part.
- 2.13
- 2.14
- 2.15
- 2.16
- 2.17 .

“Building the Homes We Need” Written Ministerial Statement (30 July 2024) (CD11.1)

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

“Building the Homes We Need” Written Ministerial Statement (13 December 2024) (CD11.2)

- 2.20 In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government’s objective to deliver 1.5 million homes during the current Parliament and made a series of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

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

“Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing” Written Ministerial Statement (12 February 2025) (CD11.3)

2.21 Another WMS from Matthew Pennycook MP once again references the scale of the housing crisis, but places specific emphasis on affordable housing, alongside the ambition to *“deliver the biggest increase in social and affordable housebuilding in a generation”*:

“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.

Among the most important causes of the housing crisis is a failure over many decades to build enough homes of all tenures to meet housing demand and housing need.”

Planning Practice Guidance (March 2014, Ongoing Updates)

2.22 The Planning Practice Guidance (“PPG”) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application. **Appendix JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

2.23 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority of successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so

long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

- 3.1 The National Housing Strategy⁵ sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 As set out earlier in this evidence, a debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply; despite the debate taking place almost a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Tandridge.

Consequences of Failing to Meet Affordable Housing Need

- 3.3 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.
- 3.4 In August 2019 the Children's Commissioner produced a report titled "*Bleak Houses: Tackling the Crisis of Family Homelessness in England*" (CD12.1) to investigate impact of homelessness and in particular the effect of this upon children.
- 3.5 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms⁶.
- 3.6 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.

⁵ Laying the Foundations: A Housing Strategy for England (November 2011).

⁶ The Children's Commissioner Report references a National Audit Office Report titled 'Homelessness' (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 3.7 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that “*Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work*” (page 18).
- 3.8 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and no choice but to move out of their local area, which can have a “*deeply disruptive impact on family life*”. This can include lack of support (from grandparents for example) and travel costs.
- 3.9 It found that a child’s education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children’s educational development can also be delayed.
- 3.10 Temporary accommodation also presents serious risks to children’s health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 3.11 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a “*significant impact on many aspects of their lives*”.
- 3.12 More recently in May 2021, Shelter published its report “*Denied the Right to a Safe Home – Exposing the Housing Emergency*” (**CD12.2**) which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that Affordability of housing is the main cause of homelessness (page 15) and that “*we will only end the housing emergency by building affordable, good quality social homes*” (page 10).
- 3.13 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years, the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

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

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

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

If you live in a home with damp and black mould on the walls, your health will suffer. (Page 9)

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

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

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

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

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

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

3.14 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).

3.15 The Report concludes (page 33) that for change to happen, “*we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there's only one way to end the housing emergency. Build more social housing*” (emphasis in original).

3.16 In April 2022 Shelter published a further report titled “*Unlocking Social Housing: How to fix the rules that are holding back building*” (CD12.3). The first paragraph of the Executive Summary is clear that:

“Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings. Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food.”

3.17 The Executive Summary goes on to state that “***An affordable and secure home is a fundamental human need***” (emphasis in original) noting that one in three of us don't have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

3.18 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the 'infrastructure levy'. It states that:

“This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners.” (My emphasis).

3.19 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – “*That's taxpayer money subsidising private landlords providing insecure and often poor-quality homes.*” The paragraph goes on to note that:

“The lack of social housing has not just pushed homeownership out of reach, it's made it nearly impossible for working families to lead healthy lives and keep stable

jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home.”

- 3.20 Regarding the temporary accommodation (“TA”) the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that “*TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies.*”
- 3.21 Page 11 goes on to highlight that “*Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the Local Authority area they previously lived in.*” This means that “*Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks.*”
- 3.22 The page goes on to conclude that “*As a result, the national housing benefit bill has grown. Tenants' incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. There are now more private renters claiming housing benefit than ever before.*” (emphasis in original).
- 3.23 Page 9 is also clear that “*Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters' housing benefit simply doesn't meet the cost of paying the rent.*”
- 3.24 In considering the consequences of this page 12 notes that “*With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution, and homelessness.*”
- 3.25 Finally, page 21 is clear that:

“For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one's life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory, but also contributes to the threads of society by helping people contribute to their communities.

The evidence is clear, the financial requirements to own one's home are out of reach for many. And many will spend years stuck in a private rented sector that's not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them.” (My emphasis).

3.26 The consequences of failing to provide enough affordable homes were also recognised by the Inspector in a recent decision in Mole Valley where I provided affordable housing evidence. Inspector McGlone (**CD9.3**) was clear at paragraph 88 of his decision that:

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

3.27 It is also pertinent to highlight that Tandridge themselves recognises the consequences of failing to meet affordable housing needs. The Foreword to the Council’s Homelessness Prevention and Rough Sleeping Strategy 2019-2023 (extended to 2025) (**CD4.10**) notes that:

“Homelessness is linked to the complex relationship between poverty and ill health... It is well documented that people living in any sort of poverty are more likely to have unhealthier lifestyles and poorer wellbeing. They are also likely to borrow money, live in overcrowded and poor quality housing, encounter more violence and abuse and experience homelessness.”

3.28 Further details are provided in my review of the Council’s Corporate Documents at Section 4⁷ below.

The Cost of Living Crisis

3.29 On 8 March 2024, the House of Commons published its ‘Rising Cost of living in the UK’ briefing report which highlights that the annual rate of inflation reached 11.1% in October 2022, a 41-year high, affecting the affordability of goods and services for households.

⁷ Paragraphs 4.33 – 4.41

3.30 The briefing report details at Section 5.1 that “*47% of adults in Great Britain reported an increase in their cost of living in February 2024 compared to a month ago*”. Moreover, Section 5.1 further specifies that “*64% of those who reported a rise in the cost of living between 14 and 25 February 2024 said they are spending less on non-essentials as a result, while 45% reported using less energy at home and 40% report cutting back on essentials like food shopping. 3% were being supported by a charity, including food banks*”.

3.31 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits.

3.32 Shelter published a briefing report in September 2022 titled ‘Briefing: Cost of Living Crisis and the Housing Emergency’ (**CD12.4**) which further explains the private rented sector problem on page one:

“LHA which determines the amount of housing benefit private renters receive has been frozen since March 2020 while private rents have risen 5% in England – and even more in some parts of the country. The freeze has left low-income private renters in an incredibly precarious position. 54% of private renters claiming housing benefit have a shortfall to their rent.” (My emphasis).

3.33 The Shelter briefing sets out that low-income households (including those at risk of homelessness) have no choice but to turn to the private rented sector due to a severe shortage of affordable housing and concludes on page two that “*the only sustainable solution is to address the causes of the housing emergency by investing in truly affordable social homes*”.

The Cost of Temporary Accommodation

3.34 In my opinion the cost of temporary accommodation is an important material consideration in the determination of this appeal.

3.35 BBC News reported on 13 October 2023 that English Councils spent more than £1.7bn on temporary accommodation for homeless people in the 2022/23 financial year. In my opinion this is a significant cost arising primarily as a consequence of a lack of affordable housing to adequately house people in need.

3.36 The article highlighted that the figure, published by the Ministry of Housing, Communities and Local Government (“MHCLG”) has increased by around 9% from the previous year. B&B accommodation alone in 2022/23 accounted for almost £500m in gross costs, increasing by a third on the previous year.

3.37 Shelter's chief executive Polly Neate was quoted in the article, stating that the amount spent on temporary accommodation was not only "*outrageous, but it's also illogical*". She went on to say that:

"We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home. [...]

This decision combined with the decades of failure to build enough social homes has meant that families can't find anywhere affordable to live and as a result are forced into homelessness in cramped and unsuitable temporary accommodation, often miles away from their children's schools and support networks." (Emphasis added)

3.38 Inside Housing reported in October 2023 that homelessness in England is continuing to increase, with figures published in July 2023 showing the number of people in temporary accommodation was at a record high and that the number of children in this situation is also at the highest level since records began in 2004.

3.39 On the 5 March 2024 MHCLG published data on the age of children under ten in temporary accommodation. The study found that there were 86,945 children under the age of ten living in temporary accommodation at the 30 June 2023, with 19,430 of these children less than 12 months old.

3.40 The Inside Housing article also highlighted that the growing cost of temporary accommodation is putting local authorities' budgets under strain. It noted that Hastings Borough Council recently faced bankruptcy, partly due to its large expenditure on temporary accommodation, which had risen to £5.6m per year, compared with £730,000 in 2019.

3.41 On the 23 January 2024, ITV News reported that the increasing cost of housing homeless people in temporary accommodation is putting local authorities on the brink of financial ruin.

3.42 The ITV News article added that according to homelessness charity Crisis, some 298,430 households approached their local council for homelessness support in the past year. Jasmine Basran, head of policy and campaigns at Crisis, said:

"Crippling financial pressures from rising living costs, unaffordable rents and a severe lack of social homes is forcing more and more people into homelessness." (Emphasis added)

3.43 A further article from Inside Housing on 24 January 2024 reported that the surge in spending on temporary accommodation could spell the “end of local government”.

3.44 The article highlighted that Councillors from across the political spectrum had expressed serious concerns over temporary accommodation spending at an emergency meeting in Westminster on 23 January 2024 where more than 50 local leaders met to discuss the “national crisis” caused by the cost of temporary accommodation.

3.45 I agree that the cost of housing people in affordable housing is spiralling out of control. I also agree with Polly Neate that, *“We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home.”*

Conclusions

3.46 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:

- A lack of financial security and stability with increased propensity for unsecured debt;
- Poor impacts on physical and mental health;
- Decreased social mobility;
- Negative impacts on children’s education and development;
- Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour, or those with substance abuse issues;
- Being housed outside social support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increasing national housing benefit bill.

3.47 These harsh consequences on households, individuals and children unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

- 3.48 I am strongly of the opinion that a step change in delivery of affordable housing is needed now.
- 3.49 The acute level of affordable housing need in Tandridge coupled with worsening affordability will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The relevant Development Plan in respect of affordable housing for the application site currently comprises the Tandridge District Core Strategy 2006-2026 (adopted 2008) and the Tandridge Local Plan (Part 2) Detailed Policies 2014-2029 (adopted 2014).
- 4.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the PPG (March 2014, ongoing updates), and a number of corporate documents which support the provision of affordable housing at the corporate level.
- 4.4 In September 2022 the Council published an Interim Policy Statement for Housing Delivery (the 'IPSHD'); it provides criteria for residential development on unallocated sites. The IPSHD does not form part of the Development Plan but has been treated as a material consideration at appeal. All sites that come forward under the IPSHD are expected, *inter alia*, to provide affordable housing.

The Development Plan

Tandridge District Core Strategy 2006-2026 (adopted 2008) (CD4.1)

- 4.5 The Tandridge District Core Strategy (the 'Core Strategy') was adopted in October 2008 and covers the period between 2008/09 and 2025/26. Core Strategy shows how housing will be delivered over the 15-year period.
- 4.6 Chapter two of the Core Strategy sets out the profile of the District. Paragraph 2.11 (page 3) that at the time of writing '*Tandridge is one of the most expensive local authority areas in the country for housing, it is also important to note that house prices within Tandridge have risen dramatically in recent years. ... Due to high house prices in the District, affordability is a major issue*'.

4.7 Chapter two concludes with paragraph 2.13 (page 3) stating the following:

'...house prices have risen to very high levels leading to an increased gap between incomes and house prices, this makes it difficult for many people to access the housing market. There is risk of labour supply shortages in particular sectors with some people being unable to afford to live in the District [emphasis added].'

4.8 Chapter 3 sets out the key challenges facing the District which the Core Strategy seeks to address. Issue 4 relates to housing states that '*providing adequate housing in terms of quantity, type and affordability is essential. The inability of households to have a home of their own is unacceptable ... Affordability is a big issue with many people being unable to access market housing. ... and may have impacts on the economy if businesses are unable to recruit staff because they cannot afford to live in the District.*'

4.9 Chapter 4 (Vision for Tomorrow's Tandridge) includes the Council's vision for the District to be delivered by the policies of the Core Strategy. This includes (page 10) '*adequate housing, ... meet the needs of all sections of the community.*'

4.10 Paragraphs 4.2 (page 10) introduces the Tandridge Community Strategy 2006-2011, which was prepared by the Local Strategic Partnership comprising members of the public, volunteers, and other stakeholders from across Surrey. It goes on to note that the visions are different but compatible.

4.11 Paragraph 4.3 (page 10) states that the Core Strategy will seek to support the Tandridge Community Strategy by '*Supplying Affordable Housing*' alongside commitments to other elements of the Strategy.

4.12 This is reflected in Objective 1 (Social Progress) of the Core Strategy (page 11) through its inclusion of '*Provision of sufficient and adequate housing ...to meet the needs of all sections of the community, including affordable dwellings...*'

4.13 Chapter 8 (Housing Need and Balance) notes (page 22) that an Affordable Housing Development Plan Document ('DPD') will be prepared to supplement the policies of the Core Strategy and will be informed by additional evidence on the viability of affordable housing to ensure that it can be delivered.

4.14 This reflects the concerns raised in the Inspector's Report on the Examination of the Core Strategy (2008) (**CD4.17**). Paragraph 9.5 of which (page 19) expressly notes:

'As the Council's evidence base for this policy [affordable housing] is flawed and fails Test 7, I intend to recommend that an interim holding policy be substituted, based on policies in the existing Development Plan and past practice which has been shown to work. I also urge the Council to prepare an Affordable Housing DPD as quickly as possible.'

4.15 As far as I can ascertain, there has been no Affordable Housing DPD published to date.

4.16 Chapter 8 continues by emphasising the importance of affordable housing, with paragraph 8.3 (page 22) providing that '*... it is necessary to provide adequate homes for a wide range of local workers in particular areas, thus underpinning economic activity.*'

4.17 Paragraph 8.3 (page 22) goes on to comment on the findings of its evidence base⁸ which '*show that there is a very high level of unmet housing need within the District ... This level of need justifies the Council seeking to maximise the supply of affordable housing from all possible sources, but particularly through the planning system which is the principal means of delivery at the present time [emphasis added].*'

4.18 Policy CSP4 (Affordable Housing) (page 24) is the principal affordable housing policy of the Core Strategy. However, the first line of Policy CSP4 states '*This is an interim holding policy pending the adoption of a substitute policy in an Affordable Housing DPD.*' As previously stated, no Affordable Housing DPD has been published to date.

4.19 Policy CSP4 states the following:

'to maximise the supply of affordable housing the Council will require:

- '*On sites within the built-up areas of 15 units or more or sites of or greater than 0.5 hectare; and*
- '*on sites within the rural areas (see Annex 3) of 10 units or more that up to 34% of the dwellings will be affordable.*'

⁸ Specifically, it refers to the Housing Needs Study (2005) and the East Surrey Strategic Housing Market Assessment (2007).

- 4.20 An overall policy target of 50 affordable completions per annum is set for the five-year period from 2007 to 2012. With paragraph 8.4 (page 22) of the supporting text clarifying that the details of how the target was set being set out in the Affordable Housing Technical Paper.1F⁹
- 4.21 Within Policy CSP4 the Council may require up to 75% of the affordable housing on a site to be social rented, the precise proportions will be agreed having regard to the specific need at the time and within the area.

**Tandridge Local Plan (Part 2) Detailed Policies 2014-2029 (adopted 2014)
(CD4.2)**

- 4.22 The Tandridge Local Plan (Part 2) Detailed Policies 2014-2029 (adopted 2014) (the 'LPP2') and principally relates to development management. Consequently, it does not contain an 'overarching' policy for the provision of affordable housing, nor does it contain policies of specific relevance to the application scheme in the context of this Proof of Evidence.

Other material considerations

Emerging Development Plan

- 4.23 The draft Tandridge Local Plan 'Our Local Plan: 2033' was submitted for examination on 18 January 2019. During the course of examination, the Inspector concluded that the plan was not capable of being made sound and on 14 February 2024 formally advised of this finding. Following this, the Full Council resolved on 18 April 2024 to withdraw the 'Our Local Plan 2033' from examination and prepare a revised new Local Plan.
- 4.24 Work on the new Local Plan remains at an early stage and is currently preparing a new evidence base with documents for consultation to follow. The Local Development Scheme (February 2025) notes that a Housing and Economic Development Needs Assessment is being prepared but has not yet been published.
- 4.25 Consequently, there is neither a published draft of the Emerging Local Plan nor has any relevant new documents been published as part of the evidence base to the new Emerging Local Plan.

⁹ The target of 50 affordable homes per years is just 7% of the 720 affordable homes per year identified as needed by the 2008 SHMA. The Affordable Housing Technical Paper referred to by paragraph 8.3 is not currently available on the Council's website.

National Planning Policy Framework (2024) (CD5.1)

4.26 The National Planning Policy Framework ("NPPF") was most recently updated in December 2024. This update included significant changes to the requirements for affordable housing provision, particularly on land within the Green Belt.

4.27 Paragraph 67 sets out the 'Golden Rules' for development within the Green Belt, stating that:

'a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should:

- a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and*
- b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable.'*

4.28 The adopted Core Strategy pre-dates all iterations of the NPPF including that published in December 2024. Consequently, paragraph 157 of the NPPF is engaged; it states:

'Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%'

4.29 In local authorities where existing policies are not in line with paragraph 67, a 15% increase in affordable housing provision should be applied to current adopted policies, up to a maximum of 50%. Policy CSP4 requires 34% affordable housing provision from qualifying sites, therefore after the 15% uplift is applied **the affordable housing requirement applicable to the appeal site is 49%**. The appeal proposals meet this requirement, **proposing 50% affordable housing** on site.

4.30 Paragraph 158 of the NPPF is clear that: *'a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.'*

Corporate Documents

4.31 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority of Tandridge District Council.

Corporate Plan 2024 to 2028 (CD4.8)

4.32 The Introduction to the Corporate Plan sets out that the Council wants an increased level of affordable housing in Tandridge that meets the individual needs of the community. Similarly, the Council's Vision for the 2024 to 2028 period is "*Protecting the environment, delivering affordable housing, putting residents at the heart of what we do and encouraging economic growth.*"

4.33 In order to achieve this Vision the Corporate Plan lists four priorities, including Priority Two, which is '*Delivering affordable housing for local people*'. The supporting text to Priority Two specifies that "*The number of households in temporary accommodation is increasing due to the cost of living crisis. The lack of affordable housing and the cost of private rented accommodation in the Tandridge district is a significant challenge for families needing affordable housing options.*"

4.34 Priority Two is accompanied by four Council objectives. Of notable relevance to this appeal is Objective Two '*Encourage the development of affordable housing by developers, ensuring new homes are well designed*'. The Council explains that this Objective will be delivered by:

- "*Using our planning policies to require private developers to deliver affordable housing from qualifying schemes in accordance with Core Strategy Policy CSP4 with a mix of housing types, tenures and size and high quality design.*
- *Giving priority to local people for affordable housing.*
- *Expand our support for registered providers of social housing, such as housing associations, to help them increase the amount of affordable accommodation they provide.*"

Homelessness Prevention and Rough Sleeping Strategy 2019-2023 (extended to 2025) (CD4.10)

4.35 The Introduction to the Strategy makes the following observations:

“...the extreme shortage of affordable housing, to rent and to buy; the increasing unaffordability of the private rented sector; set against a backdrop of welfare reform which for many reduced the amount of financial support available to cover housing costs, has all served to intensify the challenge of preventing homelessness.”

4.36 The cost of housing in Tandridge is discussed at paragraphs 1.23 and 1.24 of the Strategy, with the Council acknowledging that a significant proportion of households in the district are unable to buy or rent their own home on the open market:

“This data on poverty and ill health is significant for this district as housing is very expensive and there is a known acute shortage of affordable housing. Research¹⁰ commissioned by the Council has established that an annual income of around £71,000 per year is required to purchase entry level housing in the district. However, 75% of households in the district earn less than £70,000, suggesting that only one in four households in the district can afford to buy their own home.

Furthermore, a lower income of £38,000 has been established as being needed to be able to privately rent in Tandridge but 44% of households living in the district earn less than £40,000 per year, meaning that the cost of renting is unaffordable for these households.” [my emphasis].

4.37 The Strategy also considers the private rented sector, clarifying that monthly housing benefits are far below average rents in the district:

“The private rental sector comprises 14% of the district’s housing stock, with rents up to an average of 39% higher than the maximum level of Local Housing Allowance that can be claimed. The impact of policies such as the benefit cap are felt keenly in the district, with affected households having to fund the gap between benefits for housing costs and actual rent. In turn this impacts on the money available for essentials such as food, heating and clothing. This also has an impact on the health and wellbeing of household members...”

¹⁰ TDC Affordable Housing Needs Assessment (June 2018). This Assessment is considered in Section 5 of this Proof of Evidence.

- 4.38 At paragraph 1.33, the Council specifies that level of homelessness applications and numbers waiting on the Council's housing register are directly influenced by the supply of affordable housing.
- 4.39 The Council states at paragraph 3.1 that "*The solution to homelessness is the delivery of more affordable housing, of the right type and size and in the right area*".

Summary and Conclusions

- 4.40 The relevant Development Plan in respect of affordable housing for Tandridge District Council currently comprises the Core Strategy and LPP2.
- 4.41 The evidence set out in this section clearly highlights that within adopted policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Tandridge District Council.
- 4.42 The application proposals provide an affordable housing contribution which exceeds requirements of Core Strategy Policy CSP4.
- 4.43 The up to 95¹¹ affordable homes at the application site will make a significant contribution towards the annual affordable housing needs of the district, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 6 of this Proof of Evidence.

¹¹ The development consists of up to 190 dwellings 50% of which will be affordable, or up to 95 affordable homes.

Affordable Housing Needs

Section 5

Introduction

5.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the District.

The Development Plan

5.2 Policy CSP4 of the Core Strategy 2006 to 2026 includes a target of 50 affordable homes per annum for the period between 2007 and 2012, but this should be understood in the context of the period in question having ended more than thirteen years ago.

5.3 The Development Plan does not include a numerical target for the provision of affordable homes for the period after 2012. Instead, the adopted Core Strategy seeks 34% affordable housing provision is made from qualifying developments.

5.4 In the absence of a defined affordable housing target figure in adopted and/or emerging policy, it is important to consider the objectively assessed need for affordable housing within the most up-to-date assessment of local housing need.

Housing Market Assessments

5.5 Tandridge District Council have published three assessments of affordable housing need over the 17-year period since the start of the Core Strategy period in 2006, each of which demonstrates a severe lack of affordable housing delivery in Tandridge District. These are summarised in turn below.

East Surrey Strategic Housing Market Assessment 2008 (CD4.11)

5.6 The East Surrey Strategic Housing Market Assessment ('2008 SHMA') was published in April 2008 and identifies the objectively assessed affordable housing need for Tandridge District Council for the five-year period between 2008/09 and 2012/13. The SHMA pre-dates the National Planning Policy Framework's publication in 2012.

- 5.7 The 2008 SHMA forms part of the housing evidence base for the adopted Core Strategy (2008).
- 5.8 The 2008 SHMA concluded that there is a **need for 720 affordable dwellings per annum between 2008/09 and 2012/13.**

Affordable Housing Needs Assessment 2015 (CD4.12)

- 5.9 The Affordable Housing Needs Assessment Technical Paper ('2015 AHNA') was published September 2015. The 2015 AHNA covers the period 2015/16 to 2019/20.
- 5.10 It is important to highlight this assessment of need has been tested at Examination in Public as of the examination of the Local Plan 2033, but this should be understood in the context of that plan being found unsound and withdrawn from examination. Considered further in relation to the 2018 AHNA.
- 5.11 The 2015 AHNA concluded that there is a **need for 456 affordable dwellings per annum between 2015/16 and 2019/20.**

Affordable Housing Needs Assessment 2018 (CD4.12)

- 5.12 The Affordable Housing Needs Assessment Updated Technical Paper ("2018 AHNA") was published in June 2018. The 2018 AHNA is an update to the 2015 AHNA which previously formed part of the Council's SHMA evidence base.
- 5.13 The **2018 AHNA concluded that there is a need for 391 affordable dwellings per annum between 2018/19 and 2022/23, falling to 310 affordable homes per annum for the period between 2023/24 and 2038/39.** For the purposes of my subsequent analysis this need figure is relied upon as it's the most up to date assessment of affordable housing need within Tandridge District.
- 5.14 The 2018 AHNA provides an updated calculation of affordable housing needs, which fully updates and therefore supersedes the calculation presented in the previous 2015 AHNA. It was prepared in part to respond to the Inspector of the 2033 Local Plan requests for updates to the submitted evidence base.
- 5.15 Notwithstanding, the Inspector's principal reason for finding the plan unsound was the lack of an up-to-date evidence base. The Inspector's letter to the Council concludes in paragraph 110 (page 28) as follows:

'The Plan is not based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. It is not, therefore, sound as it is not consistent with national policy,

justified or effective, and I am not able to make it sound by main modifications for the reasons explained above.'

- 5.16 The 2018 AHNA preceded the 2018 NPPF which introduced the wider definition of affordable housing that remains the definition in the current NPPF. The 2018 AHNA does not reflect the full range of affordable housing needs recognised by the NPPF.
- 5.17 This is evident in paragraph 2.5 (page 2) of the 2018 AHNA which provides that existing affordable housing need has been identified using the households on the Housing Register '*with a continued focus on those assigned to Band A, B or C. This omits those with low preference.*'
- 5.18 Paragraph 4.21 (page 25) states that those households able to afford shared ownership are able to access the private rental market and '*therefore do not require affordable housing.*'
- 5.19 Therefore, the 2018 AHNA is likely to underestimate the level of affordable housing need in the District if the full range of affordable housing needs recognised by the current NPPF were to be considered.
- 5.20 For example, an increase in affordable housing need from the Darlington 2015 SHMA (**Appendix JS3**) was identified in the Darlington 2020 SHMA by consultants ORS (the authors of both assessments). Paragraph 3.70 of the 2020 SHMA recognised that:

'... the additional affordable housing need contained in this study comes directly from the change in definition for affordable housing set out in Annex 2 of the NPPF 2018.'

Local Housing Need vs Affordable Housing Need

- 5.21 The Council's most recently published position on is five-year housing land supply is contained in the Authority Monitoring Report ('AMR') 2023/24 (May 2024) (**CD4.14**). It sets out that the Council's overall housing need for the period 2024/25 to 2028/29 is being calculated using a figure based on the Government's Standard Methodology for assessing Local Housing Need.
- 5.22 Whilst the Standard Method for calculating Local Housing Need applies an affordability adjustment, the PPG is clear that:

'The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific

adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes' [emphasis added].

- 5.23 Providing an affordability adjustment in the calculation of local housing need to reflect disparities in the affordability of homes in an authority, is not the same as calculating a figure for number of affordable homes needed in that authority. The affordability uplift is simply a function within the standard method for calculating local housing need; it is not a basis for determining the numerical need for affordable housing nor the types of affordable housing required as defined in Annex 2 of the NPPF (December 2024).
- 5.24 This is further supported by the calculation of such need in an authority is considered under a separate section of the PPG entitled '*How is the total annual need for affordable housing calculated?*' which clearly sets out that:

'The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.'¹²

- 5.25 The NPPF is clear, at paragraph 63, that:

'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing' [emphasis added]

- 5.26 Whilst the Standard Method calculation may be appropriate for monitoring general housing needs and supply across the Authority, it does not provide a need figure for affordable housing in line with the PPG. As such, it does not reflect affordable housing need; nor is it an appropriate basis with which to monitor affordable housing supply.
- 5.27 In a similar fashion, the achievement of Housing Delivery Test targets does not signify that affordable housing needs have been being met over a period when using the standard method to calculate the 'number of homes required' for a Local Authority area.

¹² Paragraph: 024 Reference ID: 2a-024-20190220

Summary and Conclusions

- 5.28 There is a clear need for affordable housing in Tandridge. While a numerical monitoring target of 50 affordable homes is set out for the five-year period between 2007 and 2012, no numerical target is provided for the subsequent monitoring years of the plan period.
- 5.29 The 2008 SHMA identifies a need for 720 affordable homes per annum between 2008/09 and 2012/13.
- 5.30 The 2015 AHNA identifies a need for 456 affordable homes per annum between 2015/16 and 2019/20.
- 5.31 The 2018 AHNA identifies a need for 391 affordable homes per annum between 2015/16 and 2019/20 to meet the 'backlog' of need in five years, which falls to 310 affordable homes per annum for period between 2023/24 and 2038/39.
- 5.32 The 2018 AHNA is the most recent assessment of affordable housing need in the district and is that principally relied in my Proof of Evidence. However, as detailed above, the 2018 AHNA is not consistent with the NPPF and is now almost ten years old. Importantly, it will not take account of the most version definition of affordable housing as contained in the NPPF, which now includes a much broader spectrum of households that all into need. Moreover, it was prepared as part of the evidence base to the now withdrawn emerging Local Plan 2033; the having been withdrawn following the Inspector's finding, *inter alia*, during its examination that it was not supported by an up-to-date or robust evidence base.
- 5.33 Whilst the 2018 AHNA is the most recent assessment of affordable housing need in the District it is, for the reasons outlined, it is likely to underestimate the actual level of affordable housing need and was not considered to be sufficiently up-to-date or robust at examination. The 2018 AHNA and its findings should be understood in, and afforded weight proportionate to this context.

Affordable Housing Delivery

Section 6

Introduction

6.1 This section of my Proof of Evidence analyses the delivery of affordable housing in Tandridge. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the district.

Past Affordable Housing Delivery

6.2 Figure 6.1 illustrates the delivery of affordable housing (“AH”) in Tandridge since the start of the Core Strategy period in 2008/09.

*** continued overleaf ***

Figure 6.1: Gross Additions to Affordable Housing Stock, 2008/09 to 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2008/09	297	37*	12%
2009/10	172	27*	16%
2010/11	132	54*	41%
2011/12	261	60*	23%
2012/13	221	43*	19%
2013/14	256	57	22%
2014/15	142	60	42%
2015/16	322	12	4%
2016/17	228	85	37%
2017/18	332	76	23%
2018/19	244	75	31%
2019/20	262	121	46%
2020/21	117	31	26%
2021/22	238	59	25%
2022/23	303	60	20%
2023/24	238	77	32%
2024/25	175*	33	19%
Totals	3,940	967	25%
Avg. Pa.	232	57	

Source: Freedom of Information Response 5 August 2025; MHCLG Open Data

*Completions data provided by MHCLG Open Data due to incomplete response to FOI request.

- 6.3 Between 2008/09 and 2024/25, a total of 3,940 dwellings were delivered in Tandridge, equivalent to 232 per annum. Of these, 967 dwellings were affordable tenures, equivalent to 57 per annum. This equates to 25% gross affordable housing delivery.
- 6.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy ("RtB") sales from existing Council and Registered Provider ("RP") affordable housing stock.

6.5 At a national level over two million households have exercised their Right to Buy since it was introduced in 1980. In her Written Ministerial Statement of 30 July 2024, Angela Rayner MP observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:

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

6.6 Figure 6.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy period in 2008/09, net of Right to Buy sales. A net loss of 125¹³ affordable dwellings over this period¹⁴ equates to 15% of the gross affordable housing completions of 848 affordable dwellings over the 17-year period.

*** continued overleaf ***

¹³ $(125 + 5) - 5 = 125$ dwellings.

¹⁴ Right to Buy data for 2024/25 unavailable at the time of writing

Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2008/09 to 2024/25

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	LPA Acquisitions	LPA RtB sales	RP RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	A	B	C	D	E	F (B + C) - (D + E)	G (F / A) X 100
2008/09	297	37	n/a	4	n/a	33	11%
2009/10	172	27	n/a	1	n/a	26	15%
2010/11	132	54	n/a	2	n/a	52	39%
2011/12	261	60	n/a	4	0	56	21%
2012/13	221	43	n/a	11	0	32	14%
2013/14	256	57	n/a	15	0	42	16%
2014/15	142	60	n/a	7	3	50	35%
2015/16	322	12	n/a	21	1	-10	-3%
2016/17	228	85	n/a	10	0	75	33%
2017/18	332	76	0	8	0	68	20%
2018/19	244	75	0	11	0	64	26%
2019/20	262	121	0	6	1	114	44%
2020/21	117	31	1	11	0	21	18%
2021/22	238	59	7	8	0	58	24%
2022/23	303	60	2	2	0	60	20%
2023/24	238	77	1	4	0	74	31%
2024/25	175	33	n/a	n/a	n/a	33	19%
Total	3,940	967	11	125	5	848	22%
Avg. Pa.	232	57	2	8	0	50	

Source: Fol Response 5 August 2025 and MHCLG Open Data.

Figures may not sum due to rounding.

- 6.7 Figure 6.2 demonstrates that on average between 2008/09 and 2024/25, the Council has added just 50 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 22% of the total average number of net housing completions. This figure is likely to fall even further if demolitions to existing stocks were to be accounted for.
- 6.8 It should be emphasised that in the period between 2008/09 and 2012/13, net of the Right to Buy, on average 40 affordable homes were completed per annum¹⁵; the gross completion figure for the same period was 44¹⁶ affordable homes per annum. This means that both net and gross affordable housing completions were below the 50 affordable homes per annum target for this period.
- 6.9 As detailed in Section 5 of this Proof of Evidence, the target of 50 affordable homes year is just 7% of the 720 affordable homes per year identified by the 2008 SHMA as needed for the period. Consequently, the failure to deliver sufficient affordable homes to meet a target that itself is more than an order of magnitude below the level of need is an astonishing level of under delivery.
- 6.10 Notwithstanding, the above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Tandridge faster than the replacements from acquisitions.
- 6.11 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal at land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019 (**CD9.4**). Paragraph 14.108 of the Inspector's Report sets out that:

"Mr Stacey's unchallenged evidence shows that only 2,757 new affordable homes were provided in the City over the first 6 years of the plan period. This represents less than half of the target provision and a net increase of only 151 affordable homes if Right to Buy sales are taken into account. On either measure there has been a very low level of provision against a background of a pressing and growing need for new affordable homes in Birmingham [emphasis added]"
- 6.12 This was later endorsed by the Secretary of State who stated that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.

¹⁵ 199/5 = 39.8 (rounded to 40).

¹⁶ 221/5 = 44.2 (rounded to 44).

- 6.13 The seriousness of the impact was considered in an article in the Independent newspaper in June 2020 which is attached at **Appendix JS4**.
- 6.14 The article reports that "*Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show*". It goes on to discuss the national picture, explaining that "*Housing charities warned that enough "desperately needed" genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show*".
- 6.15 The article goes on to quote Jon Sparkes, who was the chief executive at homelessness charity Crisis at the time. He remarked that "*These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision.*"
- 6.16 The article also notes that a significant proportion of homes sold under the Right to Buy (for instance, around 40% of apartments) have gone on to be let in the private rented sector – in other words, what was once affordable housing is now being let out at full market rates. The article notes that "*Previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London*".
- 6.17 It is important, therefore, that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account to reflect the actual level of affordable houses available.
- 6.18 The comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery in Oxted Civil Parish

6.9 Figure 6.3 illustrates the delivery of affordable housing in Oxted Civil Parish between 2015/16 and 2024/25.¹⁷

Figure 6.3: Gross Additions to Affordable Housing Stock in Oxted Civil Parish, 2011/12 to 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2015/16	56	15	27%
2016/17	80	27	34%
2017/18	80	19	24%
2018/19	34	12	35%
2019/20	7	4	57%
2020/21	-4	5	-125%
2021/22	115	13	11%
2022/23	1	2	200%
2023/24	34	5	15%
2024/25	3	4	133%
Totals	406	106	26%
Avg. Pa.	41	11	

Source: Council's FOI response dated 21 November 2025.

6.10 Over the 10- year period between 2015/16 and 2024/25 there have been a total of 406 net overall housing completions and 106 affordable housing completions in Oxted Civil Parish. Losses existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.

6.11 Affordable housing delivery in Oxted Civil Parish over the past 10 years should be viewed in context of the fact that the Council's FOI response (**Appendix JS1**) shows that as of 20 November 2025 there were 543 households on the Housing Register specifying Oxted Civil Parish as their preferred choice of location, or 28% of 1,956 households registered on 31 March 2025.

¹⁷ The Council's FOI response of 21 November 2025 provides data for the period between 2011/12 and 2024/25, no data was provided for the 2014/15 monitoring year. Consequently, Figure 6.3 shows the period between 2015/16 and 2024/25; the Appellant reserves the right to provide updated evidence in light of any clarification received from the Council.

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Affordable Housing Delivery Compared to Affordable Housing Needs

6.12 Figure 6.4 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 456 net affordable dwellings per annum between 2015/16 and 2019/20, as set out in the 2015 AHNA.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2015 AHNA, 2015/16 to 2019/20

Monitoring Year	Additions to AH Stock (Net of RtB)	2015 AHNA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2015/16	-10	456	-466	-466	-2%
2016/17	75	456	-381	-847	16%
2017/18	68	456	-388	-1,235	15%
2018/19	64	456	-392	-1,627	14%
2019/20	114	456	-342	-1,969	25%
Total	311	2,280	-1,969		14%
Avg. Pa	62	456	-394		

Source: 2015 AHNA

6.13 Since the start of the 2015 AHNA period in 2015/16 affordable housing completions (net of Right to Buy) have averaged just 62 net affordable dwellings per annum, against a need of 456 net affordable dwellings per annum. A shortfall of -1,969 affordable dwellings arose over the five-year period, equivalent to an average annual shortfall of -394 affordable dwellings.

6.14 Figure 6.5 (overleaf) sets out affordable housing delivery, net of the Right to Buy, compared to the affordable housing need of 391 dwellings per annum between 2018/19 and 2022/23, falling to 310 affordable homes per annum from 2023/24, identified by the 2018 AHNA.

Figure 6.5: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2018 AHNA, 2018/19 to 2024/25

Monitoring Year	Additions to AH Stock (Net of RtB)	2018 AHNA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2018/19	64	391	-327	-327	16%
2019/20	114	391	-277	-604	29%
2020/21	21	391	-370	-974	5%
2021/22	58	391	-333	-1,307	15%
2022/23	60	391	-331	-1,638	15%
2023/24	74	310	-236	-1,874	24%
2024/25	33	310	-277	-2,151	11%
Total	424	2,575	-2,151		16%
Avg. Pa	61	368	-307		

Source: 2018 AHNA

- 6.15 Since the start of the 2018 AHNA period in 2018/19 affordable housing completions (net of Right to Buy) have averaged just 61 net affordable dwellings per annum, against an average net need for 368¹⁸ affordable homes per annum over the same period. A shortfall of -2,151 affordable dwellings has arisen over the seven-year period, equivalent to an average annual shortfall of -307 affordable dwellings.
- 6.16 It bears reiteration that neither the 2015 AHNA nor the 2018 AHNA reflect the current definition of affordable housing. Consequently, the shortfalls illustrated by Figures 6.4 and 6.5 would likely be greater still were they to include the full range of affordable housing need recognised by the NPPF.
- 6.17 This section has demonstrated that affordable housing delivery in Tandridge has fallen short of that required to meet the need for affordable housing identified by every assessment of since the start of the Core Strategy period.
- 6.18 Affordable housing delivery has been below even the 50 affordable homes per annum set as a target between 2008/09 and 2012/13 by the Core Strategy. By any measure

¹⁸ $((391*5) + (310*2))/7 = 368$.

The Development Plan and Related Policies

the Core Strategy has failed to deliver on its objectives or those of the Community Strategy.

Summary and Conclusions

- 6.19 The above evidence demonstrates that across Tandridge, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 6.20 In the 17-year period, for which there is data, since the start of the Core Strategy period in 2008/09, net of Right to Buy affordable housing delivery represented just 22% of overall housing delivery, equating to just 50 affordable dwellings per annum.
- 6.21 This section has highlighted that affordable housing delivery, net of the Right to Buy, has persistently fallen short of the identified need for affordable housing. Moreover, these shortfalls have arisen against a quantum of affordable housing need identified by the 2015 AHNA and the 2018 AHNA which are out of date and fail to reflect the current definition of affordable housing, introduced by the 2018 NPPF seven years ago.
- 6.22 The 2015 AHNA identified a need for 456 affordable homes per annum over the period between 2015/16 and 2019/20, or a total need for the period of 2,280 affordable homes. Over the same period, just 313 affordable homes, net of the Right to Buy were delivered. This represents a shortfall in delivery of -1,967 affordable homes against identified needs.
- 6.23 The 2018 AHNA identifies a need for 2,575 affordable homes between 2018/19 and 2024/25, 391 dwellings per annum over the first five years falling to 310 per annum from 2023/24. Between 2018/19 and 2024/25 just 424 affordable homes, net of the Right to Buy, were delivered; this equates to a shortfall of -2,151 affordable homes over the period.
- 6.24 The concerns raised about the recency of the assessments of affordable housing need, detailed in Section 5 of this Proof, were one of the principal reasons for the Inspector during examination to have considered the now withdrawn Emerging Local Plan incapable of being made sound.
- 6.25 It is in this context that the shortfalls in affordable housing delivery against identified needs should be understood. For this reason, it is my opinion that the identified shortfalls should be considered as conservative figures and that were there to be an up-to-date and NPPF compliant assessment of affordable housing need against which

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delivery could be measured there is a real prospect that the shortfall would be greater. Clearly, a position substantiated by the findings of the Darlington SHMA, included as **Appendix JS3**.

- 6.26 It is clear that a 'step change' in affordable housing delivery is needed now in Tandridge to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.27 In light of the identified level of need there can be no doubt that the delivery of up to 95 affordable dwellings on the proposed site will make an extremely important contribution to the affordable housing needs of Tandridge.

Affordability Indicators

Section 7

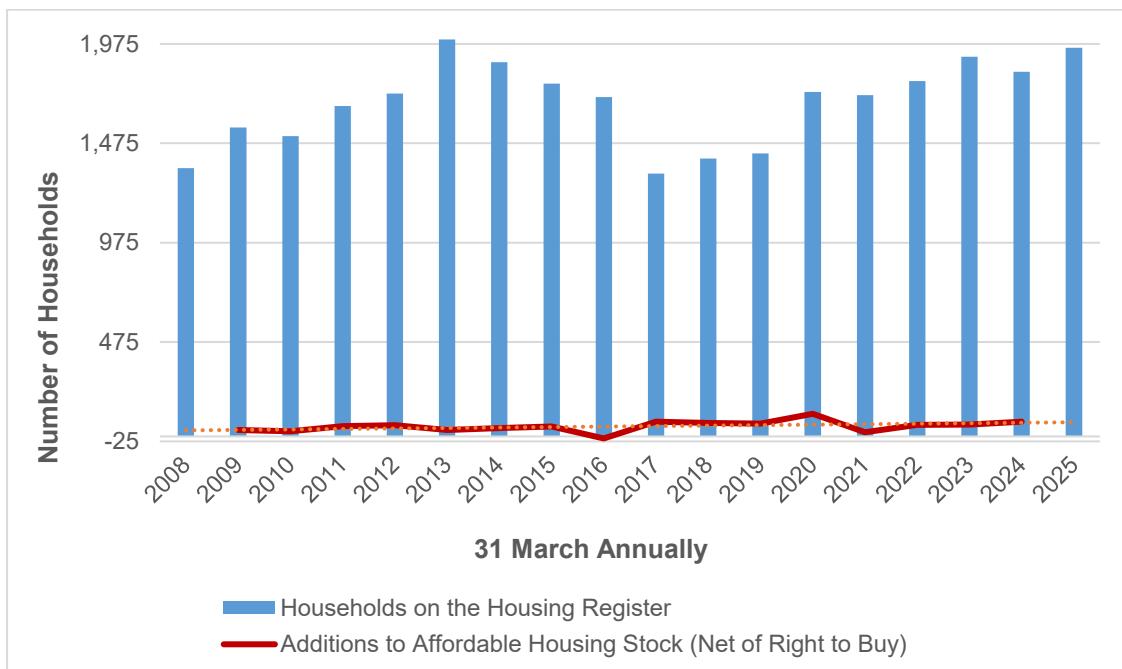
Introduction

- 7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.
- 7.2 It is important to highlight that a number of clarifications in relation to the Council's Freedom of Information response of 21 November 2025 (**Appendix JS1**) have been sought. The data to be clarified principally relates to indicators of local affordable housing need including the availability and demand for existing affordable housing stock.

Housing Register

- 7.3 The Council's Freedom of Information response (**Appendix JS1**) confirms that on 31 March 2025 there were 1,956 households on the Housing Register. This represents a 7% increase in a single year from 1,835 households MHCLG data shows on 31 March 2024.
- 7.4 The Council's FOI response (**Appendix JS1**) also identifies that whilst the Council does not require those on the Housing Register to specify a locational preference, 543 registered households indicated they would consider an affordable home in Oxted Civil Parish; this represents 28% of the 1,956 households on the Housing Register on 31 March 2025, as shown by the Council's FOI response (**Appendix JS1**).
- 7.5 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Tandridge since the start of the Core Strategy period in 2008.

Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2008 to 2025



Source: MHCLG Open Data and FOI Response 5 August 2025.

7.6 As Figure 7.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Tandridge since 2008.

7.7 Footnote 4 of MHCLG8F¹⁹ Live Table 600 highlights that:

“The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, contributed to a rise in the number of households on housing registers. The Localism Act 2011 then contributed to a decrease in the number of households on housing registers, as it allowed local authorities to set their own qualification criteria.”

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

¹⁹ Ministry of Housing, Communities and Local Government

7.9 Following the changes brought about by the Localism Act in 2011, Tandridge published a revised Housing Allocations Scheme in 2016, which received further revisions in July 2021, August 2022, and April 2023.

7.10 The Council acknowledges this process at paragraph 1.35 of its Homelessness Prevention Strategy 2019 – 2023 (extended to 2025) which states the following:

"It is important to note that in 2016, the Council undertook a review of its Allocation Scheme, which resulted in a waiting list more focussed on local housing need with many out of area and out of date applications being cancelled and this is the reason for the drop in numbers registered on the housing register between 2014/2015 and 2015/2016, rather than the reason being that the Council was meeting housing need more successfully."

7.11 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 7% in the past 12-months, indicating a worsening of affordability across Tandridge. Since the start of the Core Strategy period the Housing Register has increased by 45%, from 1,350 households in 2008 to 1,956 households in 2025.

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

7.13 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester (**CD9.6**) in August 2017. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

"The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal" (my emphasis).

7.14 Furthermore, in the appeal at Oxford Brookes University Campus at Wheatley, (CD9.7) Inspector DM Young states in paragraph 13.101 of the decision that in the context of a lengthy housing register of 2,421 households:

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

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

“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list” before concluding that “Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”.

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

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

7.17 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In my opinion the numbers on LPA’s housing register remains high.

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

7.19 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the NPPF.

7.20 The Franklands Drive Secretary of State appeal decision in 2006 (**CD9.8**) underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 of the Inspector's report the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.

7.21 As such, the number of households on the Housing Register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents. Further, as previously raised the wider definition of affordable housing is not reflected in the 2018 AHNA.

Waiting Times for Housing

7.22 The Council's Freedom of Information response (**Appendix JS1**) shows that successful applicants for affordable housing face lengthy and increasing waits for an affordable home in Tandridge.

7.23 Figure 7.2 illustrates that, based on the dwelling size, successful applicants in the 2024/25 period experienced average waiting times ranging from 608 days (approximately 1 year and 8 months) to 1,387 days (approximately 3 years and 10 months) for an affordable home. Notably, no affordable homes with four or more bedrooms were advertised in the 2024/25 monitoring year.

Figure 7.2: Housing Register Average Waiting Times, March 2025

Size of Affordable Property	Average Waiting Time to be Housed (31 March 2025) ²⁰
1-bedroom home	608 days
2-bedroom home	788 days
3-bedroom home	1,387 days
4+ bedroom home	None advertised in the period.

Source: Freedom of Information response (5 August 2025)

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

Housing Register Bids and Lettings

7.25 The Council's FOI response (**Appendix JS1**) confirms that as of 20 November 2025, there were 543 households who specified a preference for an affordable home in Oxted Civil Parish. This represents 28% of the total Housing Register (1,956 households).

7.26 Figure 7.3 below demonstrates average number of bids per property in Oxted Civil Parish over the 2024/25 monitoring period for a range of types of affordable property.

Figure 7.3: Bids Per Property in Oxted Civil Parish, April 2024 to March 2025

Type of Affordable Property	No. Properties Advertised	Average Bids Per Property
1-bed affordable dwelling	18	99
2-bed affordable dwelling	6	136
3-bed affordable dwelling	3	121
4+ bed affordable dwelling	1	137

Source: Freedom of Information response (21 November 2025)

7.27 Figure 7.3 demonstrates that between 1 April 2024 to 31 March 2025 there were an average of 99 bids per 1-bed affordable dwelling put up for let in the parish, 136 average bids per 2-bed affordable dwelling and 121 average bids per 3-bed affordable dwelling, and 137 bids per 4+ bed affordable dwelling.

²⁰ The Council's Freedom of Information response provided average waiting times for each property type by Housing Register band, including the percentage of lettings each band represented. The waiting times cited in Figure 7.2 relies on data provided in the FOI response to calculate the average waiting time for each property type across all bands as a weighted total.

7.28 For every successful letting, there are clearly tens, if not hundreds of households who have missed out and are left waiting for an affordable home. Evidently, there is a clear and pressing need for affordable homes within the Oxted Civil Parish this is not being met.

Affordable housing Stock

7.29 Data has been requested from the Council to on the level of affordable housing stock in the Oxted Civil Parish on 31 March 2025 along with the number of social housing lettings in the period between 1 April 2024 and 31 March 2025.

Temporary Accommodation

7.30 MHCLG statutory homelessness data highlights that on 31 March 2024, there were 47 households housed in temporary accommodation by the Council, with 55% of these households housed in local authority or Registered Provider stock.

7.31 Of these, 43 households (91%) were households with children. The council has a responsibility to house these households. It is notable that 31 (72%) of the 43 households with children had been in temporary accommodation for more than six months, and 19 (44%) for at least a year.

7.32 Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network, at significant cost to local taxpayers.

7.33 MHCLG data indicates that Tandridge spent £1,733,000 on temporary accommodation between 1 April 2023 and 31 March 2024.

7.34 The Tandridge Homelessness Prevention Strategy 2019 – 2023 (extended to 2025) states in paragraph 3.77 (page 40):

'The Council also works in partnership with Raven Housing Trust which provides temporary accommodation on behalf of the Council. The Council entered into a partnership with Raven because it was committed to improving the quality of temporary accommodation, which historically was not purpose built and required intensive management to support the residents to avoid issues such as anti social behaviour for the local community.'

7.35 On 17 September 2025 the Regulator of Social Housing published its regulatory judgement for Tandridge District Council along with a grading of C4. C4 is the lowest possible grade and means that the Regulator of Social Housing may directly intervene. Tandridge District Council was found to have ‘*very serious failings*’ and that ‘*Fundamental changes are required to the service...*’

7.36 The “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” report (**CD12.1**) published in August 2019 by the Children’s Commissioner found that temporary accommodation presents serious risks to children’s health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.

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

Homelessness

7.38 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 170 households in need of homelessness prevention duty²¹, and a further 105 households in need of relief duty²² from the Council.

7.39 The Tandridge Homelessness Prevention Strategy 2019 to 2023 (extended to 2025) notes that of the four main causes of homelessness in the district, ‘*The first three causes are all symptoms of the acute lack of affordable housing in the district ...* [my emphasis]’. These are loss of Assured Shorthold Tenancy (38%), parental eviction (29%) and eviction by a friend or relative (10%).

7.40 Furthermore a 2017 report by the National Audit Office (“NAO”) found that “*The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England.*”

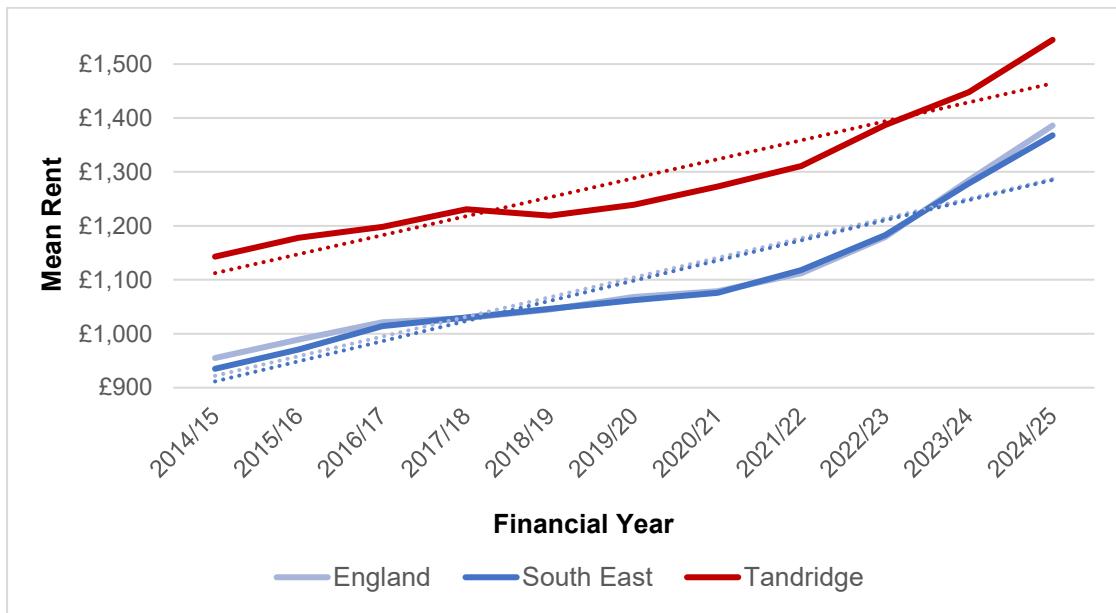
²¹ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

²² The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

Private Rental Market

7.41 Office for National Statistics ("ONS") data (first produced in 2014/15) shows that average (mean) private rents in Tandridge stood at £1,545 per calendar month ("pcm") in 2024/25. This represents a 35% increase from 2014/15 where average private rents stood at £1,143 pcm.

Figure 7.4: Average (Mean) Private Sector Rents, 2014/15 to 2024/25



Source: ONS.

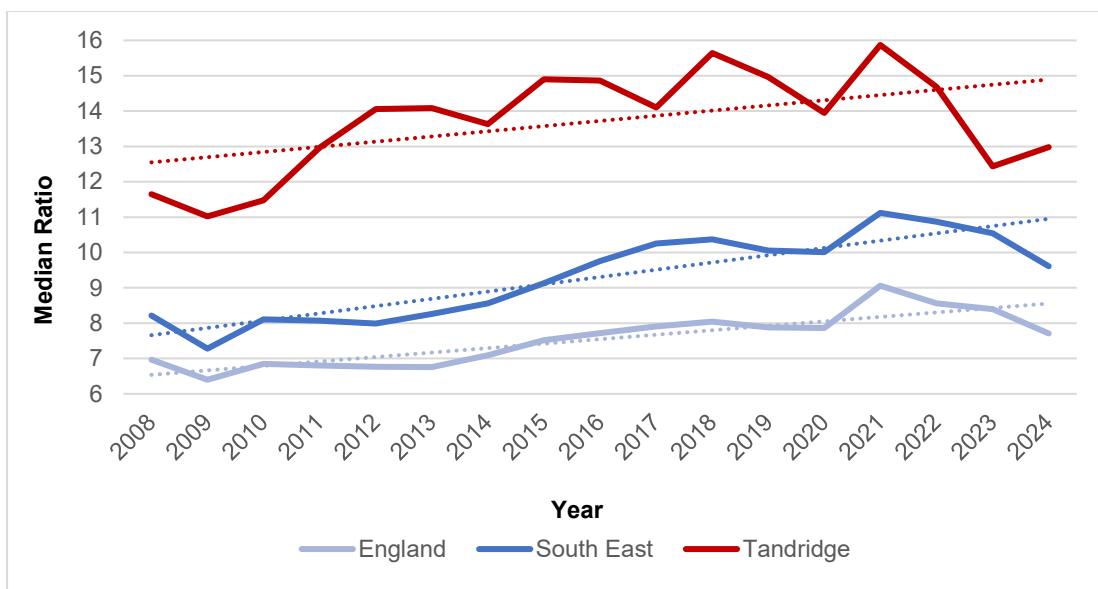
7.42 An average rent of £1,545 pcm in 2024/25 is 13% higher than the South East figure of £1,368 pcm and 11% higher than the national figure of £1,386 pcm.

7.43 It is important to note that ONS rental data is calculated using all transaction data, i.e., existing lets as well as new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Tandridge.

Median House Prices

7.44 The ratio of median house prices to median incomes in Tandridge now stands at **12.98**, an 11% increase since the start of the Core Strategy period in 2008 where it stood at 11.65. A ratio of 12.98 in 2024 stands very substantially above the national median of 7.71 (+68%) and significantly above the South East median of 9.61 (+35%).

Figure 7.5: Median Workplace-Based Affordability Ratio comparison, 2008 to 2024



Source: ONS.

7.45 It is also worth noting that a figure of 8 times average incomes was described as a problem by the former Prime Minister in the foreword to the White Paper entitled 'Fixing our broken housing market'. Here, the affordability ratio is some 62% higher than that.

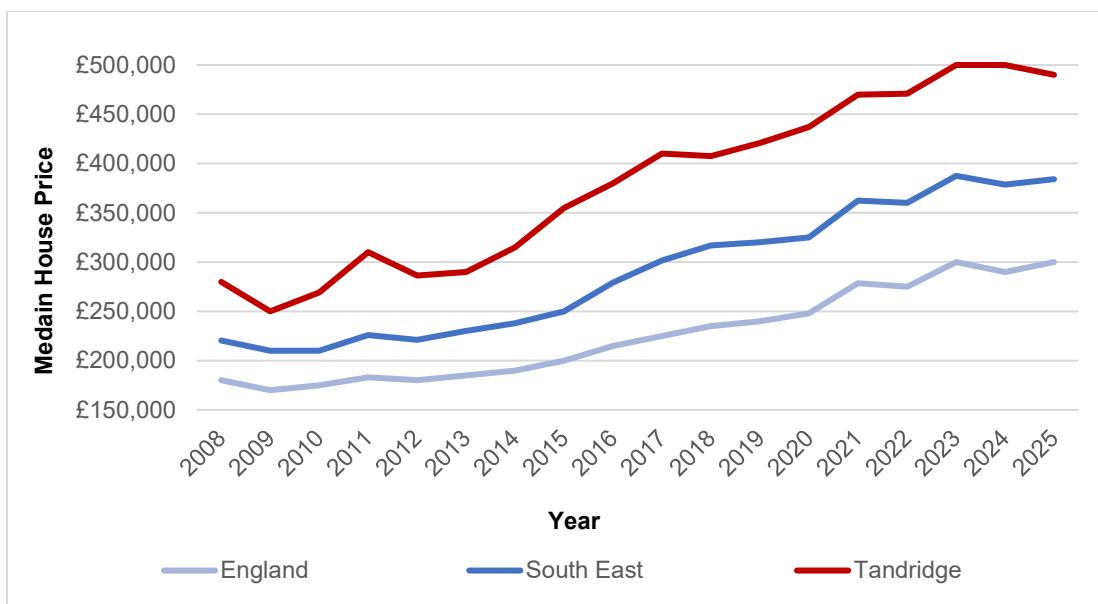
7.46 Notably the median house price to income ratio in Tandridge increased (+4%) in the most recent monitoring year²³ in stark contrast to the declines observed in England (-8%) and the South East (-9%).

7.47 Figure 7.6 illustrates the median house sale prices for England, the South East, and Tandridge. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2008 and 2025.

*** continued overleaf ***

²³ The 2023 to 2024 monitoring year is the most recent for which data is available.

Figure 7.6: Median House Price Comparison, 2008 to 2025



Source: ONS.

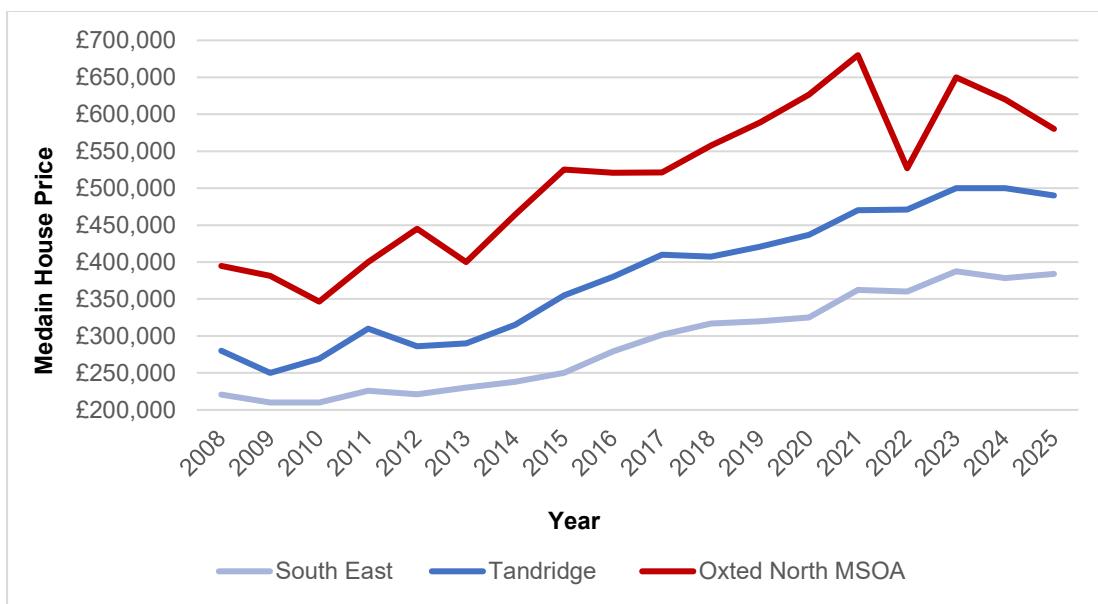
7.48 The median house price across Tandridge has risen by 75% from £279,950 in 2008 to £490,000 in 2025. This figure is strikingly above (63% higher) the national figure of £300,000, which has seen an increase of 67% over the same period and 28% higher than the South East figure of £384,000 which has seen an increase of 74% over the same period.

7.49 Figure 7.7 below compares the median house sale prices in the Oxted North MSOA²⁴ (Tandridge 006) with Tandridge and the South East. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2008 and 2025.

** continued overleaf **

²⁴ Middle-layer Super Output Area, a medium-sized statistical geography in England and Wales, used by the Office for National Statistics. MSOAs are designed to have consistent population sizes (5,000 to 15,000) and household numbers (2,000 to 6,000), making them useful for statistical analysis.

Figure 7.7: Median House Price Comparison, 2008 to 2025



Source: ONS.

7.50 The median house price across Oxted North MSOA has risen by 47% from £395,000 in 2008 to £580,000 in 2025. Despite the median house prices in the Oxted North MSOA increasing at a lower rate over the period than those in Tandridge (+75%) and England (+74%) they remain significantly higher.

7.51 In 2025 the median house price in Oxted North MSOA (£580,000) is 18% higher than the figure for Tandridge as a whole (£490,000) and substantially (+51%) higher than the median house price in England (£384,000).

Lower Quartile House Prices

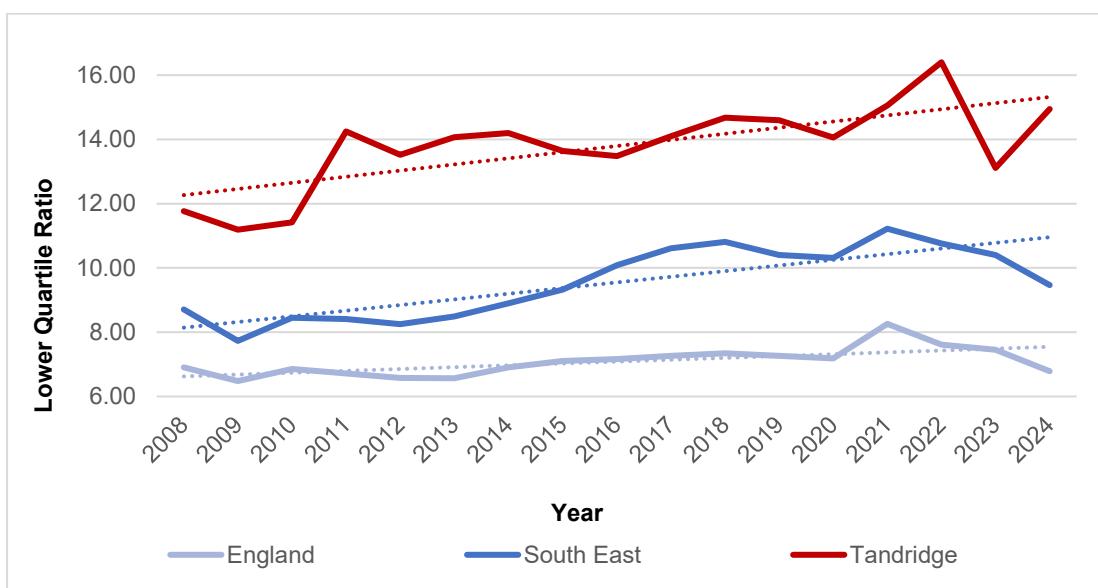
7.52 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in Tandridge in 2024 stood at **14.94**, a 27% increase since the start of the Core Strategy period in 2008 when it stood at 11.77.

7.53 Pertinently, the start of the Core Strategy period broadly corresponds with the onset of the 2008 financial crash. This is notable as while the ratio between lower quartile incomes and house prices in England has remained broadly flat since 2008 (-2% over the period), with the exception of spike in 2021 and 2022 potentially linked to Covid 19 related changes in the housing market, whereas in Tandridge it increased 27%. **The increase in the ratio in Tandridge is triple the increase observed in the South East** region as whole (+9%) over the same period.

7.54 This means that those on lower quartile incomes in Tandridge, seeking to purchase a property priced in the lower quartile, now need to find almost **15 times their annual income** to do so.

7.55 Once again it remains the case that the ratio in Tandridge stands substantially above the national average of 6.79 (+120%) and significantly above the South East average of 9.47 (+58%). It follows that housing in this area is unaffordable for a significant part of the local population.

Figure 7.8: Lower Quartile Workplace-Based Affordability Ratio comparison, 2008 to 2024



Source: ONS.

7.56 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is more than three times (332%) higher than that.

7.57 Crucially, the ratio between lower quartile incomes and house prices in Tandridge increased 14% in the last twelve months, between 2023 and 2024; this stands in stark contrast with the declining ratios in both the South East (-9%) and England (-9%) over the same period.

7.58 Figure 5.5, unfortunately, bears out the concerns of the Core Strategy. As highlighted in Section 4 of this Proof of Evidence, paragraph 2.13 of the Core Strategy observed that:

'house prices have risen to very high levels leading to an increased gap between incomes and house prices, this makes it difficult for many people to access the housing market. There is risk of labour supply shortages in particular sectors with some people being unable to afford to live in the District.'

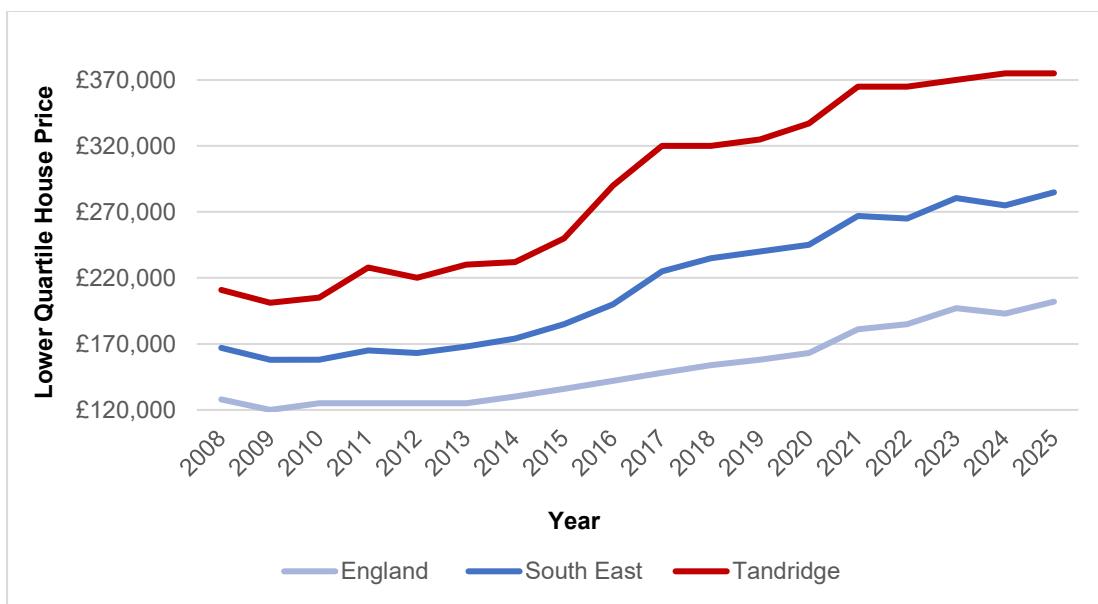
7.59 Figure 7.8 illustrates that the ratio between lower quartile incomes and house prices in Tandridge at the start of the Core Strategy period was (11.77) 35% higher than that of the South East (8.71) and 70% higher than that for England (6.91). In 2024 the lower quartile ratio in Tandridge (14.94) was 58% higher than that in the South East (9.47) and a substantial 120% higher than the rest of England (6.78).

7.60 Over the Core Strategy period, affordability in Tandridge has not just failed to improve, but it has worsened dramatically, markedly faster than the rest of the South East and England. Only 30 of the 318 local planning authorities in England and Wales have seen an increase (worsening) in the lower quartile affordability ratio in the last 12 months, **Tandridge saw the largest increase – i.e. Tandridge was top of the list of authorities where the affordability of housing has worsened.**

7.61 This fact alone demonstrates the acute nature of the affordable housing crisis in Tandridge.

7.62 Figure 7.9 illustrates the lower quartile house sale prices for England, South East, and Tandridge. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2008 and 2025.

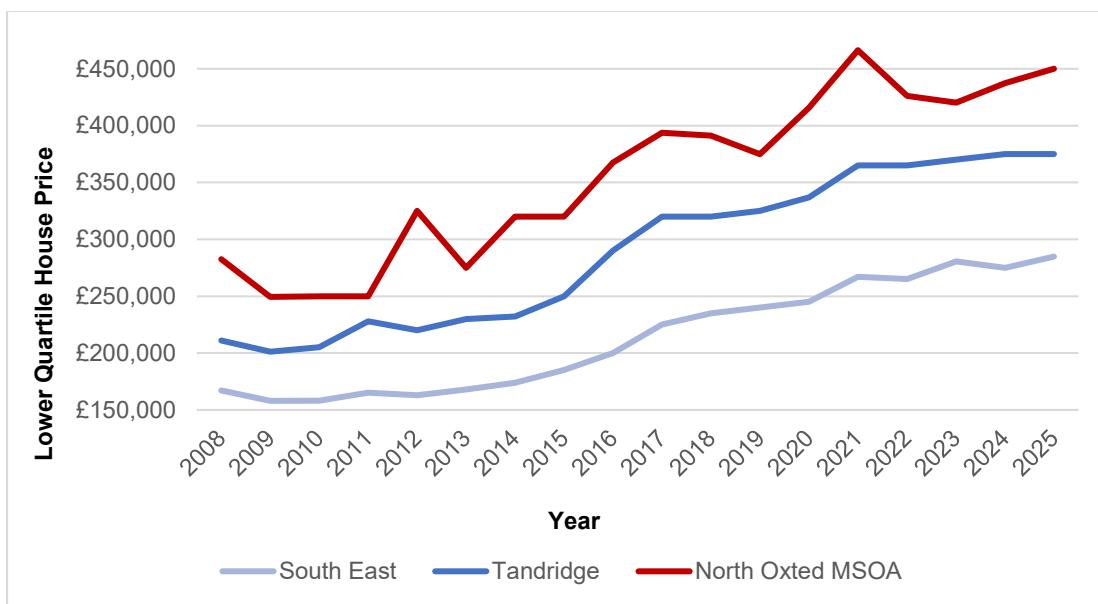
Figure 7.9: Lower Quartile House Prices, 2008 to 2025



Source: ONS.

- 7.63 The lower quartile house price across Tandridge has risen by 78% from £210,941 in 2008 to £375,000 in 2025. This compares to a 71% increase across the South East and a national increase of 58% over the same period.
- 7.64 In 2025 lower quartile house prices in Tandridge (£375,000) were 32% higher than across the South East (£284,838) and 82% higher than the national figure (£202,000).
- 7.65 Figure 7.10 below compares the lower quartile house sale prices in the Tandridge 006 MSOA with Tandridge and the South East. Once again it demonstrates that they have increased dramatically between the start of the Core Strategy period in 2008 and 2025.

Figure 7.10: Lower Quartile House Price Comparison, 2008 to 2025



Source: ONS.

7.66 The lower quartile house price across North Oxted MSOA (Tandridge 006) has risen by 59% from £282,500 in 2008 to £450,000 in 2025. This figure is 20% higher than the Tandridge figure of £375,000, (which has seen an increase of 78% over the period) and 58% higher than the South East figure of £284,838 (which has seen an increase of 71% over the period).

7.67 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (**CD9.9, p.17, [78-79]**) in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

“78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere. In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products.

79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. I therefore place **substantial positive weight** on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard [my emphasis].'

Summary and Conclusions

- 7.68 As demonstrated through the analysis in this section, affordability across Tandridge has been, and continues to be, in an acute crisis.
- 7.69 House prices and rent levels are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Tandridge out of the reach of more and more people, as recognised by the Council itself in its Homelessness and Rough Sleeping Strategy.
- 7.70 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Tandridge, with a lower quartile house price to average income ratio of **14.94**. In other words lower quartile house prices are now **almost 15 times annual earnings**.
- 7.71 Market signals indicate a worsening trend in affordability in Tandridge and within the Oxted North MSOA. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Future Supply of Affordable Housing

Section 8

Introduction

8.1 This section of the evidence considers the future supply of affordable housing across Tandridge in comparison with identified needs.

Addressing the Shortfall in Affordable Housing Delivery

8.2 The 2018 AHNA identifies an objectively assessed need for 391 affordable dwellings per annum between 2018/19 and 2022/23, falling to 310 affordable homes per annum for the period between 2023/24 and 2038/39. Over the 20-year period this equates to a total need for 6,605 net affordable homes.

8.3 It is important to highlight that the 2018 AHNA does not reflect the full range of affordable housing recognised by the current NPPF. Moreover, the 2018 AHNA is more than seven years old and was prepared as part of the evidence base to the 'Our Local Plan 2033'. Which was withdrawn having been found during examination to not be '*based on adequate, up-to-date and relevant evidence...*'

8.4 On that basis, despite being the most recent assessment of affordable housing need in Tandridge the 2018 AHNA is likely to represent an underestimate of that need. Consequently, the shortfalls in affordable housing delivery that have arisen against that need must be understood in that context.

8.5 In the first seven years of the 2018 AHNA period, the Council have overseen the delivery of 424 affordable homes (net of Right to Buy) against a need of 2,575 net new affordable homes, which has resulted in a shortfall of -2,151 affordable homes.

8.6 I consider that any shortfall in delivery should be dealt with within the next five years. This is also an approach set out within the PPG²⁵ and endorsed at appeal.

²⁵ Paragraph: 022 Reference ID: 68-031-20190722

8.7 The critical importance of understanding the ability of the Council to meet future need was considered in a recent appeal at Sondes Place Farm, Dorking, where I provided affordable housing evidence. The Inspector accepted the findings of the 'future supply of affordable housing' evidence and endorsed the use of the Sedgefield approach to clear a previous backlog of affordable housing delivery (**CD9.3, p.16 [85-86]**):

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

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

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

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

8.9 In my opinion, it is therefore imperative that the shortfall of -2,151 affordable homes accumulated since 2018/19 is addressed as soon as possible and in any event within the next five years.

8.10 When the shortfall is factored into the need for 310 affordable homes per annum identified by the 2018 AHNA period between 2025/26 and 2029/30, the number of affordable homes the Council will need to complete increases by 139% to 740 net affordable homes per annum over the period.

8.11 This would ensure that for the remainder of the 2018 AHNA period up to 2038/39 the annual affordable housing need falls back to 310 per annum to deal solely with newly arising need. This is illustrated in Figures 8.1 and 8.2.

Figure 8.1: Annual Affordable Housing Need incorporating Backlog Needs since the 2018/19 base date of the 2018 AHNA

A	Affordable housing need per annum for the period 2018/19 to 2024/25 identified in the 2018 ANHA	368²⁶
B	Net Affordable housing need for the period 2018/19 to 2024/25 (A x 7)	2,575
C	Net of Right to Buy sales Affordable housing completions for the period 2018/19 to 2024/25	424
D	Shortfall/backlog of affordable housing need for the period 2018/19 to 2024/25 (B – C)	2,151
E	Backlog affordable housing need per annum required over the period 2025/26 to 2029/30 (D /5)	430²⁷
F	Full affordable housing need per annum for the period 2025/26 to 2029/30 (310 + E)	740²⁸
G	Full affordable housing need for the period 2025/26 to 2029/30 (F x 5)	3,700

8.12 Further indication of the severity of the situation can be seen in Figure 8.2 below which illustrates that the Council would need to deliver 740 net affordable homes over the next five years to address backlog needs in line with the Sedgefield approach (which seeks to address accumulated needs within 5 years along with ongoing need).

Figure 8.2: Annual Affordable Housing Need 2025/26 to 2029/30 incorporating Backlog Needs Accrued in 2018/19 to 2025/25 when applying the Sedgefield Approach

Monitoring Period	2018 AHNA Net Affordable Housing Need per annum	Net Affordable Housing Need per annum When Addressing Backlog Within Next Five Years
2025/26	310	740
2026/27	310	740
2027/28	310	740
2028/29	310	740
2029/30	310	740
Total	1,550	3,700

8.13 It is clear that the backlog of affordable housing needs within Tandridge will continue to grow unless the Council takes urgent and drastic action to address needs and deliver more affordable homes.

²⁶ $((391*5)+(310*2))/7=367.9$ (rounded to 368).

²⁷ $2,151/5=430.2$ (rounded to 430).

²⁸ $310+430.2=740.2$ (rounded to 740).

The Future Supply of Affordable Housing

- 8.14 The Council's latest Five-Year Housing Land Supply position ("5YHLS") is set out in its Statement of Case (**CD7.1**) for this appeal, covering the period 1 October 2025 to 31 September 2030.
- 8.15 If we were to generously to assume that all 2,170 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide Policy CPS4 compliant levels of affordable housing (i.e. 34%) as a proportion of overall housing completions, this is likely to deliver only 738 affordable dwellings over the period, equating to just 148 new affordable dwellings per annum.
- 8.16 This figure falls chronically short of the 740 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and substantially short of the 310 net affordable housing needs per annum identified in the 2018 SHMA.
- 8.17 More realistically, if one were to assume that the past gross affordable housing provision of 22% is to be continued over the next five years, this is likely to deliver only 477 affordable dwellings over the period, equating to just 75 new affordable dwellings per annum.
- 8.18 As Figure 6.2 of this evidence highlights, affordable housing provision has slipped far below the policy CSP4 compliant 34% since the start of the plan period in 2008/09 up to 2023/24. Average delivery on a per annum basis over the same period has been just 51 affordable homes net of Right to Buy.
- 8.19 Consequently, I have no confidence that the Council can see a sufficient step change in the delivery of affordable housing to meet annual needs. This makes it even more important that suitable sites, such as the appeal site, are granted planning permission now in order to boost the supply of affordable housing.

Summary and Conclusions

- 8.20 It is imperative that the -2,151 dwelling affordable housing shortfall accumulated since 2018/19 is addressed as soon as possible and in any event within the next five years.
- 8.21 When the shortfall is factored into the 2018 SHMA identified need of 310 affordable homes per annum for the period 2025/26 to 2029/30, the number of affordable homes the Council will need to complete increases by 139% to 740 net affordable homes per annum over the period.

8.22 The above evidence demonstrates that Council is unlikely to be able to meet its affordable housing needs over the next five years. Generously assuming all sites in the in the 5YHLS would provide policy compliant levels of affordable housing there is a possible supply of just 148 new affordable dwellings per annum. If we were to assume that the past gross affordable housing provision of 22% is to be continued over the next five years, this is likely to deliver only 477 affordable dwellings over the period, equating to a much lower affordable housing future supply of just 75 new affordable dwellings per annum.

8.23 Consequently, there is a substantial need for more affordable housing now. In light of the Council's poor record of affordable housing delivery and the volatility of future affordable housing delivery there can be no doubt that the provision of up to 95 affordable dwellings on this site to address the district-wide needs of Tandridge should be afforded **very substantial weight** in the determination of this appeal.

Council's and Rule 6's Assessment of the Application

Section 9

Introduction

- 9.1 This section of the evidence considers the Council's Assessment of the appeal proposal in relation to affordable housing during the course of the application and the appeal process.
- 9.2 The Council's assessment of the proposed development, in relation to affordable housing provision, centres on two points.
- 9.3 The first is that Tandridge District Council is constrained in its ability to meet its identified housing need and that the Council has increased the supply delivery of housing. Effectively asserting, that the need for housing is reduced by the constraints on the delivery of housing.
- 9.4 The second being the weight to be ascribed to the provision of affordable housing. In that despite the constraints on housing delivery in the District the Council asserts that it has sufficiently increased housing delivery such that the weight in the planning balance to be ascribed to the provision of housing, including affordable housing, is limited to significant combined weight.

Interim Policy Statement for Housing Delivery

- 9.5 The Council and the Rule 6 party refer to the Interim Policy Statement for Housing Delivery (the 'IPSHD'). The specific points raised by the Council and the Rule 6 party are considered in turn below; however, the overarching point raised by both the Council and the Rule 6 party is that the IPSHD identifies '*clear delivery pipeline of new housing and has evidenced increased housing supply and delivery as a direct result of the adoption of the IPSHD.*'²⁹

²⁹ Paragraph 8.5 page 19 of the Council's Statement of Case.

9.6 The IPSHD was published in September 2022 and I note does not form part of the Development Plan or any other statutory status. The IPSHD supports applications on sites that were identified in the now withdrawn Our Local Plan: 2033' (Appendix A Sites) '*where the Examiner did not raise concerns*' inter alia.

9.7 The sites identified by the Council's Statement of Case and that of the Rule 6 party as having been delivered in accordance with the IPSHD represent a mixture of Appendix A Sites and those met other criteria. The pertinent point being that those cited by the Council and Rule 6 Party omit Appendix A Sites that have been refused planning permission³⁰ and includes sites that were allowed at appeal.³¹

9.8 This suggests that the IPSHD may play a role in facilitating affordable housing delivery in the District, but it is not a credible means of addressing the scale of shortfall identified. Moreover, the number of appeals and applications referred to the Secretary of State³² despite being Appendix A Sites suggests that irrespective of the Council's assertion that the IPSHD represents a '*clear delivery pipeline*' the delivery pipeline is by no means clear or sufficient.

Officer Report

9.9 The application was refused on 15 August 2025 (**CD3.3**) under delegated powers. The Planning Officer's Report³³ can be seen under **CD3.1** which recommended the application for refusal.

Affordable Housing Need and Delivery

9.10 Paragraph 10i) (page 3) identifies '*Housing land supply (that is market housing, affordable housing and extra care housing) and the weight that should be afforded to this ...*' as the first of the key issues in determining the application.

9.11 Notably, this frames housing as a single issue thereby conflating questions of need and supply along with the separate weight that should be ascribed to different types and tenures of housing.

³⁰ Land at The Old Cottage, Station Road, Lingfield was dismissed at appeal in October 2023, reference APP/M3645/W/23/3319149.

³¹ Land West of Limpfield Road, Warlingham CR6 9RD was allowed at appeal in April 2023, reference APP/M3645/W/22/3309334

³² Former Shelton Sports Club was granted planning permission in June 2025 having been validated in March 2022, reference 2022/267. The Council's Planning Committee resolved to grant planning permission on 7 December 2023, referred to the Secretary of State on 4 January 2024, and the Secretary of State responded on 11 January 2024 confirming that the application would not be called in for determination.

³³ The Officer's Report does not include page numbers; consequently, the page numbers referenced are those of the PDF.

9.12 It should also be highlighted that Policy CSP4 (Affordable Housing) is omitted from the list of Development Plan policies '*considered most important in the determination of this application ...*', paragraph 22 (page 15). It also appears that there is no comment of any kind from the Council's Housing Enabling Officer.

9.13 Given the scale of affordable housing need identified in the evidence base to the adopted Core Strategy and the withdrawn 'Our Local Plan: 2033' it is striking that the principal policy for the delivery of affordable housing is not considered by the Council to be included among the 18 '*most important*' policies in determining the application.

9.14 Paragraph 28 (pages 15 and 16) of the Officer's Report refers to the Interim Policy Statement for Housing Delivery (the 'IPSHD'), published in September 2022, as enabling '*new housing to boost the supply because of the problems with the then emerging Local Plan...*'

9.15 Paragraphs 29 and 30 (page 16) clarify that the Council consider that sites granted planning permission under the IPSHD have '*contributed significantly*' to its current housing land supply and that further delivery is expected on '*other sites that are likely to come forward*'. These '*other sites*' are not identified.

9.16 The IPSHD is not a policy for the delivery of affordable housing, it has not resulted in the Council having a demonstrable five year housing land supply, and the planning permissions referenced by the Council have not resulted in a measurable increase in the delivery of affordable housing relative to delivery prior to the publication of the IPSHD.

9.17 The IPSHD was published in the middle of the seven monitoring years since the start of the 2018 AHNA in 2018/19. Figure 6.1 of this evidence shows that in the monitoring years between 2018/19 and 2021/22 a gross annual average of 72 affordable homes were delivered.

9.18 Over the three monitoring years since the publication of the IPSHD, 2022/23 to 2024/25, the gross average rate of delivery fell to 57 affordable homes per annum. These figures are lower still once the Right to Buy is accounted for.³⁴

³⁴ For the 2024/25 monitoring year there is no data on total completions or the impact of the Right to Buy.

9.19 The delivery of affordable housing in Tandridge has not met the need identified in any assessment since the start of the Core Strategy period, as demonstrated in Section 6 of my evidence. This reflects findings of the Inspector's Report on the Examination of the Core Strategy (**CD4.17**), paragraph 9.5 (page 19) provides:

'As the Council's evidence base for this policy [affordable housing] is flawed and fails Test 7, I intend to recommend that an interim holding policy be substituted ... I also urge the Council to prepare an Affordable Housing DPD as quickly as possible.'

9.20 Almost ten years later there remains no published Affordable Housing DPD and the interim policy (CSP4) is still in place.

9.21 Paragraph 34 (page 17) sets out the Council's conclusions on housing supply, need, and the weight it should be ascribed in the planning balance.

'... in the absence of a five year housing land supply, and notwithstanding the progress being made in housing delivery in Tandridge District through the adoption and implementation of the IPSHD, significant weight should be given to the proposal in this planning application for the delivery of market and affordable housing in the overall planning balance [my emphasis].'

9.22 It is unclear why the Officer's Report makes no reference to either the extent of the need for affordable housing or the rate of affordable housing delivery despite, as shown by my evidence, there is not only a very substantial identified need for affordable housing in the District but that delivery has persistently fallen short of meeting that need.

9.23 Almost ten years ago the Core Strategy recognised (page 3) that '*affordability is a major issue*' leading to a '*risk of labour supply shortages in particular sectors with some people being unable to afford to live in the District*.'

9.24 In my view, the Council lacks an up-to-date, NPPF compliant, assessment of affordable housing need in the District. Moreover, affordable housing delivery has been persistently and significantly below every assessment of affordable housing need since the start of the Core Strategy.

Weight

9.25 The Officer's Report, at paragraph 167 (page 54), provides that the provision of market and affordable housing collectively carry significant positive weight in the planning balance.

9.26 However, the Officer's Report makes no reference the appeal scheme delivering affordable housing in excess of the requirement under Policy CSP4 or to the scale of affordable housing need.

9.27 Paragraph 169 of the Officer's Report acknowledges that the '*provision of market and affordable housing*' represent the most significant benefits of the scheme but references the absence of a five-year housing land supply not the chronic under-delivery of affordable housing or the scale of unmet need.

9.28 Further, the Officer's Report does not consider affordable housing need separately to the overall housing need nor does it consider the benefits of affordable housing separately to the benefits of market housing. Affordable housing is recognised as a separate material consideration to market housing, as shown by Section 11 of my evidence.

9.29 In my opinion, the Officer's Report does not appropriately reflect the extent of the affordable housing need in the District or the inadequate level of affordable housing delivery.

Tandridge District Council Statement of Case

9.30 The Council submitted their Statement of Case ("SoC") in respect of the appeal proposals to the Inspectorate in November 2025 which can be viewed under **CD7.1**.

Need and Delivery

9.31 The Council's SoC does not provide any comment on the need for affordable housing in the District. Paragraph 8.7 (page 20) states that evidence on provision of affordable housing will be provided but does include any reference to affordable housing needs.

9.32 In this context, I highlight paragraph 8.6 (page 19) of the Council's SoC which states that in examining the 'Our Local Plan: 2033' (**CD4.25**) the Inspector '*accepted that Tandridge would not be able to meet its objectively assessed need for housing in full.*' It continues on page 19 to conclude '*These constraints can reasonably be expected to reduce any future housing requirement.*'

9.33 Footnote 1 of the Council's SoC clarifies that paragraph 8.6 relies on paragraph 44 of the Inspector's Report, which relates to the preliminary conclusions and advice of 11 December 2020. Paragraph 44 provides that whilst '*in principle*' the Plan could be found sound without meeting the OAN in full this resulted from being unable to '*conclude on what a sound requirement should be. This is because of the position on the OAN, the need to recalibrate housing supply...*

9.34 In other words, the deficiencies in the evidence base prevented the Inspector from reaching a conclusion on the extent to which the housing requirement was constrained by policies of the NPPF. Further, 'Our Local Plan: 2033' was not examined against the current iteration of the NPPF which introduced the Golden Rules for development in the Green Belt.

9.35 Moreover, the December 2024 NPPF clarified the importance of meeting housing needs. Specifically, paragraph 61 (previously 60) has been revised to exclude the words '*as possible*' in relation to the aim of meeting local housing needs. It now reads as follows.

'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community [my emphasis].'

9.36 The Inspector's recommendation to withdraw the 'Our Local Plan: 2033' was principally the result of its inadequate evidence base, with the 2018 AHNA being specifically identified for review.³⁵ Paragraph 40 of the Inspector's Report states '*The low affordability of homes and the high need for affordable homes to meet existing and future needs add to the acuteness and intensity of need for new homes in Tandridge.*'

9.37 It bears emphasis that the 2018 AHNA remains the most recent assessment of affordable housing need in the District. Section 5 of my evidence demonstrates the 2018 AHNA is likely to be an underestimate the actual level of affordable housing need in Tandridge, as it does not reflect the broader spectrum of affordable housing need first recognised in the definition provided by 2018 NPPF, and retained in every subsequent publication of the NPPF.

9.38 Paragraph 8.5 (page 19) of the Council's SoC asserts that '*... the Council is taking a proactive approach to meeting housing needs by positively using its IPSHD to significantly boost housing supply on suitable locations as required by the NPPF.*' Paragraph 8.7 (page 20) continues '*Tandridge Council is pro-actively seeking to build*

³⁵ The Inspector Report on the Examination of the Tandridge District Council Our Local Plan: 2033 (February 2024) provides on pages 30 to 31 a list of evidence base documents to be reviewed and updated; the list includes all of the assessments of affordable housing need in the District.

affordable homes on its land and land the Council can acquire on the right terms, and in other ways.'

9.39 However, neither provide a figure for affordable housing needs the Council aims to meet nor is any strategy for alleviating the backlog of unmet need – the needs of these households are not acknowledged in any form.

Weight

9.40 Paragraph 23.1A (page 44) of the Council's SoC identifies the policies of the Development Plan the appeal scheme is considered to comply with; it omits Policy CSP4 the requirements of which the proposed development not only meets but exceeds.

9.41 No reference is made to the 'Golden Rules' for development in the Green Belt provided by paragraphs 156 to 157 of the NPPF. Section 4 of my evidence outlines the applicability and operation of the Golden Rules in relation to the appeal scheme. Notwithstanding, the appeal scheme in providing 50% affordable housing more than meets the requirements of the Golden Rules.³⁶

9.42 Pursuant to paragraph 158 of the NPPF '*development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.*' It is not clear what, if any, weight the Council has given to the proposed development's compliance with the Golden Rules.

9.43 Affordable housing delivery in the District relies on Policy CSP4 of the Core Strategy despite Policy CSP4 being an interim policy intended to be superseded by an Affordable Housing DPD more than ten years ago.

9.44 This is reflected in the Council's delivery record. Since 2018/19 it has delivered just 17% of the need identified by the 2018 AHNA, as outlined in Figure 6.5 of this evidence.

9.45 Clearly, the policies of the Core Strategy have failed to meet the identified need for affordable housing, and the Council has no identifiable policy or strategy to do so.

³⁶ 49% affordable housing provision is required after applying the 15% uplift under the Golden Rules to the 34% provision sought by Policy CSP4 of the Core Strategy.

Oxted & Limpsfield Residents Group and Oxted Parish Council Statement of Case (CD8.1)

9.46 The Oxted & Limpsfield Residents Group (the 'OLRG') and Oxted Parish Council (the 'Parish Council') were collectively granted Rule 6 (R6) status in October 2025 (hereafter the 'R6 Party'). In November 2025 the R6 Party submitted their Statement of Case (the 'R6 SoC') (**CD8.1**).

9.47 Paragraph 78 (a-f) (pages 23-24) of the R6 SoC considers affordable housing in Tandridge in relation to the appeal scheme. It is important to highlight that paragraph 78 asserts that the '*weight given to the provision of market and affordable housing should be reduced ...*' but the R6 SoC does not state what weight market or affordable housing should be given.

9.48 Paragraph 78a. (page 23) asserts that the IPSHD has given the Council a '*clear delivery pipeline of new housing*' and that the sites granted permission under this pipeline include affordable housing. Paragraph 78b. (page 24) continues by repeating the argument that the constraints in the District '*can reasonably be expected to reduce any future housing requirement*' without presenting any alternative figure as an affordable housing requirement.

9.49 No reference is made to the level of affordable housing need identified by any Housing Need Assessment, including the 2018 AHNA. Notwithstanding the concerns raised by the Inspector in relation to the evidence base, including the 2018 AHNA, the delivery of affordable housing has been substantially below the level required to meet the identified need, as demonstrated in Section 6 of my evidence.

9.50 Therefore, the assertion that housing delivery, including affordable housing, in the District has improved carries little weight when it is decoupled from any accepted metric of assessment. This is underscored by the delivery of affordable housing remaining chronically below even the level of need identified by the 2018 AHNA, which in itself is likely to be an underestimate of affordable housing need i.e there is now a broader spectrum of need due to a change in the definition of affordable housing in the NPPF.

9.51 Paragraph 78.e (page 24) alludes to '*affordable market housing*' not '*directly assist[ing] those on its housing register*' in contrast to '*affordable rental homes*' delivered by the Council.

9.52 Leaving aside the point that the R6 SoC “appears” to be referring to affordable home ownership (‘AHO’), which comprise a range of affordable housing needs recognised by the NPPF, the proposed tenure mix of the affordable housing is a Reserved Matter. Irrespective of the R6 Party’s view of AHO there is no basis to conclude now that AHO is not needed, because the 2018 AHNA does not consider this.

9.53 Overall, the R6 SoC provides no cogent reason to reduce the planning weight given to the up-to 95 affordable homes that will be provided by the appeal scheme.

Summary and Conclusions

9.54 I do not consider that the Council (not the R6 Party) have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.

9.55 The acute level of affordable housing need in Tandridge, coupled with a persistent lack of delivery and worsening affordability bucking national trends, will detrimentally affect the ability of people to lead the best lives they can. Whilst I do not challenge the right of objectors to oppose unwelcome development, it is a stark aspect of my experience of almost all of the inquiries in which I have given evidence, that those in housing need never attend to explain exactly why they need additional housing and the consequences of not providing it.

9.56 In my opinion, the Council has thus far sought to downplay the provision of up to 95 affordable homes at the appeal site in its Statement of Case. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **very substantial weight** in the determination of this appeal.

Benefits of the Proposed Affordable Housing at the Appeal Site

Section 10

- 10.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 10.2 As set out in the previous chapter there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. Tandridge is no exception to this.
- 10.3 The appeal scheme will provide 95 affordable dwellings on site. The wider social and economic benefits of affordable housing per se are commonly recognised.
- 10.4 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

Benefits of the proposed Affordable Housing at the appeal site

- 10.5 The affordable housing offer exceeds the requirements of Policy CSP4 of the Core Strategy 2006-2026 (adopted October 2008). It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 10.6 This fact was acknowledged by the Inspector presiding over two appeals on Land to the west of Langton Road, Norton (**CD9.10**) in September 2018 who was clear at paragraph 72 of their decision that:

“[I]n the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit” (my emphasis).

10.7 Similarly, as recognised in a recent appeal decision in at Coombebury Cottage, Dunsfold (**CD9.1, p.8, [48]**) “*the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs.*” The benefits of the proposed affordable homes at the appeal site should therefore be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.

10.8 The affordable housing benefits of the appeal scheme are therefore:

- 50% (95 dwellings) of the scheme provided as affordable housing;
- A deliverable scheme which provides much needed affordable homes;
- In a sustainable location;
- With the affordable homes managed by a Registered Provider;
- Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation; and
- Greater security of tenure than the private rented sector.

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

Summary and Conclusions

10.10 I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.

10.11 The acute level of affordable housing need in Tandridge, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can.

10.12 In my opinion, the Council have deliberately sought to downplay the provision of 95 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **very substantial weight** in the determination of this appeal.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 11

- 11.1 The NPPF is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 11.2 Paragraph 61 of the NPPF sets out the Government's clear objective of "*significantly boosting the supply of homes*" before explaining that "*The overall aim should be to meet an area's identified housing need*".
- 11.3 Furthermore, paragraph 62 requires that "*To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.*" (My emphasis).
- 11.4 The NPPF requires local authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, "*including those who require affordable housing*".
- 11.5 I also note the findings of Inspector Kevin Ward in July 2015 who considered (and subsequently allowed) an outline planning permission for the erection of up to 90 dwellings with vehicular access on to Hollybush Lane and associated public open space, landscaping, and drainage work on Land at Firlands Farm, Hollybush Lane, Burghfield Common, Reading, Berkshire (**CD9.12**).
- 11.6 Mr Ward identified that the individual benefits of a scheme are not transferable, as each development should be considered on its own merits. Mr Ward indicated at paragraph 58 that:

"Whilst it may be that similar economic and social benefits could be achieved from other sites including the preferred option sites, I do not consider that this is relevant to the assessment of whether the particular proposal before me represents sustainable development in its own right."

11.7 The context of this decision is in relation to a previously determined appeal at Mans Hill also located within Burghfield Common (**CD9.13**). However, Mr Ward set out his comments in relation to the distinction between the two appeals at paragraphs 70 and 71, which I set out below:

"70. I have given careful consideration to the decision of the Inspector who dealt with the appeal at Mans Hill. It is worth emphasising that in that case the Inspector was considering a noticeably larger proposal adjoining a different part of the village. Whilst I have approached the issue of housing land requirements and supply from a different perspective, I reach the same conclusion that Policy HSG.1 of the Local Plan should not be considered up to date and the proposal should be assessed in the light of Paragraph 14 of the NPPF.

71. As explained above I take a different view as to the weight to be given to the emerging HSADPD and do not consider that the particular proposal before me would undermine the plan making process. I have also taken a different view of the weight to be attached to social and economic benefits as I consider that the proposal should be assessed in its own right in terms of sustainable development. Notwithstanding this, it is clear that the Inspector in the Mans Hill case had significant concerns regarding the adverse effect on the character and appearance of the area. I do not share such concerns in relation to the proposal before me."

11.8 As can be seen, it is for each case to be considered on its individual merits.

11.9 Another appeal that considers the issue of benefits is the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at Hawkhurst in Kent (**CD9.14**). In critiquing the Council's views regarding the affordable housing benefits of the scheme, the Inspector made the following comments:

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

11.10 I agree, the recipients of 95 homes here will not describe their needs as generic.

11.11 Considering the authority's past poor and lamentable record of affordable housing delivery, high and rising numbers of households on the housing register and the absence of an up to date assessment of affordable housing needs for the District, there can be no doubt in my mind that the provision of up to 95 affordable dwellings on this site should be afforded **very substantial weight** in the determination of this appeal.

Relevant Secretary of State and Appeal Decisions

11.12 The importance of affordable housing as a material consideration has been reflected in several Secretary of State ("SoS") and appeal decisions.

11.13 Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance. A collection of such SoS decisions can be viewed at **Appendix JS5**.

11.14 Brief summaries of appeal decisions relevant to this appeal are summarised at **Appendix JS6**.

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

- Affordable housing is an important material consideration;
- The importance of unmet need for affordable housing being met immediately;
- Planning Inspectors and the Secretary of State have attached substantial weight and very substantial weight to the provision of affordable housing; and
- Even where there is a five-year housing land supply the benefit of a scheme's provision of affordable housing can weigh heavily in favour of development.

Summary and Conclusion

11.16 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.

11.17 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.

11.18 Market signals indicate a worsening trend in affordability across Tandridge and, by any measure of affordability, this is an authority amid an affordable housing emergency, and one through which urgent action must be taken to deliver more affordable homes.

11.19 Against the scale of unmet need and the lack of suitable alternatives in the private rented sector across Tandridge, there is no doubt in my mind that the provision of up to 95 affordable homes will make a substantial contribution. Considering all the evidence I consider that this contribution should be afforded **very substantial weight** in the determination of this appeal.

Appendices for Affordable Housing Proof of Evidence of James Stacey BA (Hons) DipTP MRTPI

Land South of Barrow Green Road, Oxted

Appendices for Affordable Housing Proof of Evidence of James Stacey BA (Hons) DipTP MRTPI

Outline application for a residential development of up to 190 dwellings (including affordable homes) (Use Class C3), an extra care facility with up to up 80 beds (Use Class C2), together with the formation of vehicular access, landscaping, parking, open space, green and blue infrastructure, and all other associated development works. All matters reserved except access

Land South of Barrow Green Road, Oxted

Croudace Homes Ltd

December 2025

PINS REF: APP/M3645/W/25/3372747

LPA REF: 2025/245

OUR REF: M25/1019-01.RPT

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Appendices

Appendix JS1	Freedom of Information Correspondence (5 August, 21 November 2025, and 24 November 2025)
Appendix JS2	Planning Practice Guidance, relevant extracts (March 2014, ongoing updates)
Appendix JS3	Extract: 2020 Darlington SHMA
Appendix JS4	Independent News Article (June 2020)
Appendix JS5	Affordable Housing as a Separate Material Consideration
Appendix JS6	Relevant Secretary of State and Appeal Decisions

Appendix JS1

Freedom of Information Correspondence (5 August, 21 November 2025, and 24 November 2025)

Housing Register

1. The total number of households on the Council's Housing Register on 31 March 2025 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2025)
Oxted Civil Parish	This information is not held for the date requested. However, the figure at 20/11/25 is 543

2. The number of properties advertised, and the average number of bids per property over the 2024/25 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Oxted Civil Parish	
	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling	18	99
2-bed affordable dwelling	6	136
3-bed affordable dwelling	3	121
4+ bed affordable dwelling	1	137

Social Housing Stock

3. The total number of social housing dwelling stock on 31 March 2025 in the following locations:

Location	Total Social Housing Stock (31 March 2025)
Oxted Civil Parish	The housing management system uses wards not parish boundaries, we have a total of 156 properties in Oxted

Social Housing Lettings

4. The number of social housing lettings in the period between 1 April 2024 and 31 March 2025 in the following locations:

Location	Social Housing Lettings
1 April 2024 to 31 March 2025	
Oxted Civil Parish	28

Housing Completions

5. The number of NET housing completions in Oxted Civil Parish broken down on a per annum basis between 2000/01 and 2024/25.

6. The number of NET affordable housing completions in Oxted Civil Parish broken down on a per annum basis between 2000/01 and 2024/25.

	Net completions	Net affordable units
11/12	13	4
12/13	31	7
13/14	19	11
15/16	56	15
16/17	80	27
17/18	80	19
18/19	34	12
19/20	7	4
20/21	-4	5
21/22	115	13
22/23	1	2
23/24	34	5
24/25	3	4
Oxted Total	469	128

Jemma Hutchinson

From: Nathan Price
Sent: 05 December 2025 15:39
To: freedomofinformation@tandridge.gov.uk
Cc: Dan Austen-Fainman
Subject: RE: Freedom of Information Request - Housing Data

Good afternoon,

I am writing to please request an update to the below Freedom of Information clarification query.

Best regards,

**Nathan Price BA (Hons) MSc
Planner**
TETLOW KING PLANNING



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Appendix JS2

Planning Practice Guidance, relevant extracts (March 2014, ongoing updates)

Extracts from Planning Practice Guidance

Appendix JS2

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-006-20241212	<p>This section sets out that assessments of housing need should include considerations of and be adjusted to address affordability.</p> <p>This paragraph sets out that <i>“an affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need.”</i></p> <p>This is because:</p> <ul style="list-style-type: none"> • <i>housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed</i> • <i>people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.</i> <p><i>“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”</i></p>
Housing and Economic Needs Assessment	018 Reference ID 2a-01820190220	Sets out that <i>“all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework”</i> .
Housing and Economic Needs Assessment	019 Reference ID 2a-01920190220	States that <i>“strategic policy making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments)”</i> .
Housing and Economic Needs Assessment	020 Reference ID 2a-02020190220	<p>The paragraph sets out that in order to calculate gross need for affordable housing, <i>“strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:</i></p> <ul style="list-style-type: none"> • <i>the number of homeless households;</i>

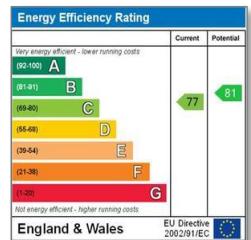
		<ul style="list-style-type: none"> • <i>the number of those in priority need who are currently housed in temporary accommodation;</i> • <i>the number of households in over-crowded housing;</i> • <i>the number of concealed households;</i> • <i>the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i> • <i>the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.”</i>
Housing and Economic Needs Assessment	024 Reference ID 2a-02420190220	<p>The paragraph states that “<i>the total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period</i>”.</p> <p>It also details that:</p> <p><i>“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”</i></p>
Housing Supply and Delivery	022 Reference ID: 68-031-20190722	<p>With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states:</p> <p><i>“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach)…”</i></p>
Housing Needs of Different Groups	001 Reference ID: 67-001-20190722	<p>Sets out the relationship between affordable housing need and overall housing need:</p> <p><i>“This need [for specific groups of people] may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.”</i></p>

Appendix JS3

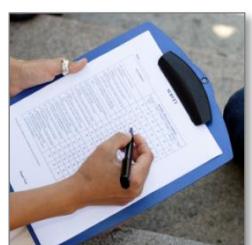
Extract: 2020 Darlington SHMA



Darlington Strategic Housing Market Assessment 2020



Report of Findings December 2020





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1. Introducing the Study

Background to the project

Introduction

- 1.1 Opinion Research Services (ORS) was commissioned by Darlington Borough Council in 2015 to prepare a Strategic Housing Market Assessment, which was subsequently published as Part 1 Objectively Assessed Needs including affordable housing and Part 2 which considered the housing needs of particular groups.
- 1.2 An update to Part 1 was published in 2017 to reconsider the overall housing need for Darlington and this found an annual need for 459 dwellings plus the equivalent of 33 more dwellings to provide for Class C2 needs. However, the need for affordable housing and the needs of particular groups were not reassessed in that study.
- 1.3 Since 2015, the National Planning Policy Framework and Planning Practice Guidance for housing needs has been updated and the date range for the proposed Darlington Local Plan has been changed from 2011-36 to 2016-36. Therefore, the evidence to be found in both Parts 1 and 2 of the SHMA 2015 is now over 5 years old and references policies and guidance which is now out of date.
- 1.4 This current study utilises with the 2017 updated overall housing need figure of 459 dwellings annum plus the 33 dwellings to provide for Class C2 needs, but provides up to date information on affordable housing needs and the needs of particular groups in line with current policy requirements. It also includes information from the SHMA 2015, such as the section on Housing Market Areas, to ensure that with the 2017 update it can be read without further need to reference the SHMA 2015.

Government Policy

- 1.5 The Government published the National Policy Planning Framework (the Original NPPF) in 2012. This set out the planning policies for England and how these were expected to be applied.
- 1.6 The Original NPPF had a presumption in favour of sustainable development, and paragraph 47 stated that Local Plans should meet "*the full, objectively assessed needs for market and affordable housing in the housing market area*". The responsibility for establishing housing need rested with the local planning authority and Paragraph 159 of the Original NPPF set out that they "*should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries*".
- 1.7 A revised version of the National Policy Planning Framework (the Revised NPPF) was published in July 2018. Whilst the Revised NPPF maintains the underlying theme of sustainable development, several significant changes have been introduced in relation to identifying and meeting housing needs. The Revised NPPF was updated in February 2019 to incorporate a number of detailed changes following a technical consultation. Whilst most of the changes appear relatively minor, they may have a substantial impact on identifying and meeting housing needs in some areas. The results of the consultation were summarised in the document "Government response to the technical consultation on updates to national planning policy and guidance".
- 1.8 Under the Revised NPPF, local planning authorities are still responsible for assessing their local housing needs; however, Paragraph 60 identifies that "*strategic policies should be informed by a local housing need*

assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach". This represents a significant change, as the standard method sets out a formulaic approach to determine the minimum Local Housing Need (LHN) figure and prescribes the use of specific data for the calculation. Therefore, whilst the responsibility for establishing housing need continues to rest with the local planning authority, this is now constrained to a minimum figure that is determined centrally by the Government.

^{1.9} This focus on local area has led to a change in the Duty to Cooperate, where neighbouring authorities now have to produce Statements of Common Ground. Whilst HMA are no longer mentioned explicitly in the Revised NPPF, Paragraph 60 identifies that "*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*"; and PPG identifies that HMA are still one of the factors which must be considered when determining the relevant cross-boundary areas for plan-making [ID 61-010-20180913].

^{1.10} The Revised NPPF has also introduced a new definition for affordable housing. Whilst the Original NPPF identified (in the Glossary at Annex 2) that affordable housing should be provided for households "*whose needs are not met by the market*", the Revised NPPF adds that this includes "*housing that provides a subsidised route to home ownership and/or is for essential local workers*". This has led to a specific change in the Planning Practice Guidance (PPG) for assessing affordable housing need.

^{1.11} Under the Original NPPF, affordable housing need was based on those who could not afford to buy or rent in the market. Households who could afford market rent were not counted as in affordable housing need even if they would have preferred to buy and couldn't afford to do so. However, the latest PPG states that assessments must now include the needs of "*those that cannot afford their own homes, either to rent, or to own, where that is their aspiration*" [ID 2a-020-20190220]. On this basis, households able to afford market rent who aspire to but are unable to afford homeownership must now be counted as being in affordable housing need.

Covid 19

^{1.12} Queries have been raised across the country about the impact of Covid 19 on population projections. However, unless Covid 19 becomes an recurring event the impact on population projections over a plan period is likely to be minimal. Similarly, any movement away from major cities to rural locations cannot yet be taken as a long-term trend. Therefore, we have made no adjustments within this study in light of the impact of Covid 19.

Brexit

^{1.13} It is important to recognise that at this stage there is still great uncertainty as to the nature of any future trade relationship with the EU and therefore the potential short, medium, and long-term implications of Brexit on the UK economy. As a result, there is little clarity on what that will mean for the economy or housing needs, so it is difficult to specifically account for at this stage and again we have made no specific adjustments to the report.

3. Affordable Housing Need

Identifying households who cannot afford market housing

Introduction

3.1 This section represents an update of the analysis in the SHMA 2015 to include new data and the impact of policy changes. It represents a technical exercise to comply with the requirements of the NPPF and the PPG. We would note that all figures in this section relate to households, not dwellings, until Figure 21 where the results are converted in to the need for dwellings.

3.2 The definition of affordable housing was changed by the new National Planning Policy Framework (2018), with a specific emphasis now placed on affordable homeownership. Annex 2 of the Framework now defines affordable housing as being:

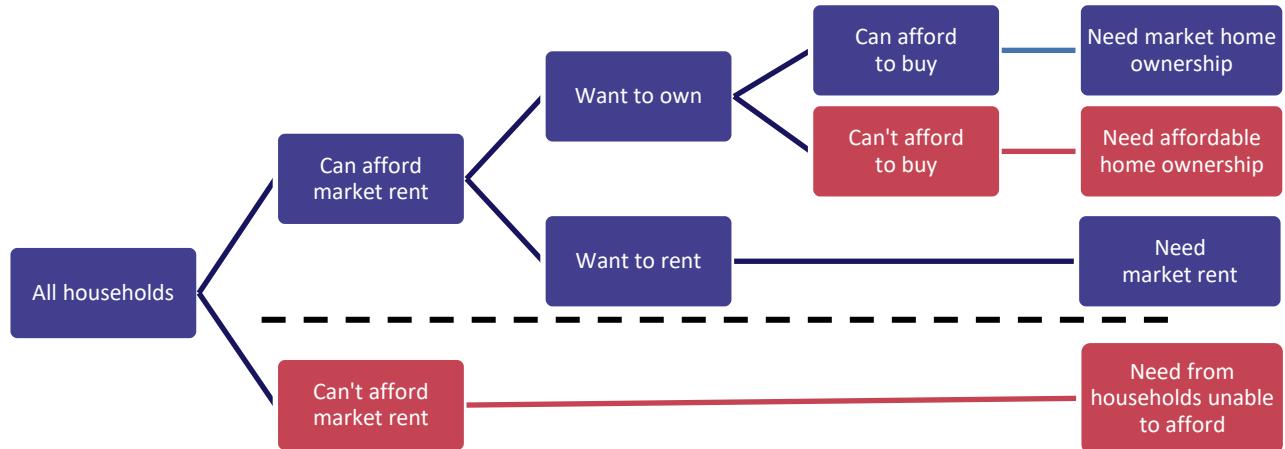
Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)

National Planning Policy Framework 2018, Annex 2

3.3 To reflect this change, relevant paragraphs of PPG have also been updated to confirm that the types of household to be considered in housing need should include “*those that cannot afford their own homes, either to rent, or to own, where that is their aspiration*” [PPG ID 2a-020-20190220].

3.4 The assessment of affordable housing need therefore needs to consider both those who cannot afford to rent and those households who can afford to rent but would like to buy.

Figure 6: Establishing the need for market and affordable housing



3.5 There is a well-established method for assessing the needs of households who cannot afford to own or rent suitable market housing. However, PPG provides no guidance on how the needs of households who can afford to rent but would prefer to own, should be assessed.

Assessing Affordable Housing Needs

^{3.6} The ORS Housing Mix Model considers the need for market and affordable housing on a long-term basis that is consistent with household projections. The model uses a range of secondary data sources to build on existing household projections and profile how the housing stock will need to change in order to accommodate the projected future population.

^{3.7} The model provides robust and credible evidence about the required mix of housing over the full planning period and recognises how key housing market trends and drivers will impact on the appropriate housing mix.

^{3.8} The PPG identifies that “projections of affordable housing need will need to take into account new household formation, the proportion of newly forming households unable to buy or rent in the market area, and an estimation of the number of existing households falling into need” (ID 2a-021). **The ORS Model recognises that the proportion of households unable to buy or rent in the market area will not be the same for all types of household, and that this will also differ by age.** Therefore, the appropriate proportion is determined separately for each household type and age group.

^{3.9} The affordability percentages in Figure 7 are calculated using detailed information from the 2011 Census alongside data published by DWP about housing benefit claimants. For each type of household in each age group, the table identifies the percentage of households unable to afford their housing costs. This is the proportion of households in each group that either occupy affordable housing or receive housing benefit to enable them to afford market housing.

Figure 7: Assessing affordability by household type and age (Source: Census 2011 and DWP)

Percentage unable to afford market housing	Under 25	25-34	35-44	45-54	55-64	65+
Single person household	24%	13%	35%	37%	40%	34%
Couple family with no dependent children	21%	7%	10%	7%	8%	13%
Couple family with 1 or more dependent children	39%	24%	13%	7%	12%	20%
Lone parent family with 1 or more dependent children	82%	64%	47%	37%	43%	55%
Other household type	53%	59%	39%	22%	20%	13%

Current Unmet Needs of Households Unable to Afford

^{3.10} Any exploration of housing need in an area must first give consideration to existing unmet needs. The PPG states:

How should the current unmet gross need for affordable housing be calculated?

Plan makers should establish unmet (gross) need for affordable housing by assessing past trends and recording current estimates of:

- » *the number of homeless households;*
- » *the number of those in priority need who are currently housed in temporary accommodation;*
- » *the number of households in overcrowded housing;*
- » *the number of concealed households;*

- » the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings);
- » the number of households from other tenures in need and those that cannot afford their own homes.

Care should be taken to avoid double-counting, which may be brought about with the same households being identified on more than one transfer list, and to include only those households who cannot afford to access suitable housing in the market.

Planning Practice Guidance (February 2019), ID 2a-020-20190220

^{3.11} Households assumed to be unable to afford housing include:

- » All households that are currently **homeless**;
- » All those currently housed in **temporary accommodation**; and
- » People in a **reasonable preference category** on the housing register, where their needs have not already been counted.

^{3.12} Given this context, the model includes the needs of all these households when establishing the need for affordable housing at a base date of 2016.

^{3.13} The analysis counts the needs of all households living in overcrowded rented housing when establishing the affordable housing need (which could marginally overstate the requirements) but it does not count the needs of owner occupiers living in overcrowded housing (which can be offset against any previous over-counting). Student households are also excluded, given that their needs are assumed to be transient and do not count towards the need for affordable housing in Darlington.

^{3.14} **Concealed families** are an important part of unmet housing need. However, not all concealed families want separate housing. Those with older family representatives will often be living with another family, perhaps for cultural reasons or in order to receive help or support due to poor health. However, those with younger family representatives are more likely to be experiencing affordability difficulties or other constraints (although even here not all will want to live independently).

^{3.15} Any concealed families in a reasonable preference category on the housing register will be counted regardless of age. The analysis also considers the additional growth of concealed families with family representatives aged under 55 (even when not on the housing register) and assumes that all such households are unlikely to be able to afford housing (otherwise they would have found a more suitable home).

^{3.16} The analysis does not count people occupying insanitary housing or otherwise living in unsatisfactory housing conditions as a need for additional affordable housing. These dwellings would be unsuitable for any household and enabling one household to move out would simply allow another to move in – so this would not reduce the overall number of households in housing need. This housing need should be resolved by improving the existing housing stock, and the Council have a range of statutory enforcement powers to improve housing conditions.

^{3.17} Figure 8 sets out the assessment of current affordable housing need for Darlington:

Figure 8: Assessing current unmet gross need for affordable housing (Source: ORS Housing Model)

	Affordable Housing			Current unmet Housing Need
	Gross Need	Supply	Net Need	
Homeless households in priority need [Source: CLG P1E returns 2016]				
Currently in temporary accommodation in communal establishments (Bed and breakfast or Hostels)	3		3	3
Currently in temporary accommodation in market housing (Private sector leased or Private landlord)	0		0	
Currently in temporary accommodation in affordable housing (Local Authority or RSL stock)	1	1	0	
Households accepted as homeless but without temporary accommodation provided	6		6	6
Concealed households [Source: Census 2001 and 2011]				
Growth in concealed families with family representatives aged under 55	63		63	63
Overcrowding based on the bedroom standard [Source: Census 2011 and English Housing Survey]				
Households living in overcrowded private rented housing	247		247	
Households living in overcrowded social rented housing	273	273	0	
Other households living in unsuitable housing that cannot afford their own home [Source: CLG Local Authority Housing Statistics 2016]				
People who need to move on medical or welfare grounds, including grounds relating to a disability	222	11	211	
People who need to move to a particular locality in the authority, where failure to meet that need would cause hardship (to themselves or to others)	27	1	26	
TOTAL	842	286	556	72

^{3.18} Based on a detailed review of both the past trends and current estimates our analysis has concluded that 842 households are currently living in unsuitable housing and are unable to afford their own housing. This assessment is based on the criteria set out in the PPG and avoids double counting, as far as possible.

^{3.19} Of these households, 286 currently occupy affordable housing that does not meet the current householders' needs, mainly due to overcrowding. Providing more suitable housing for these households will enable them to vacate their existing affordable housing property, which can subsequently be allocated to another (smaller) household in need of affordable housing.

^{3.20} There is, therefore, a net affordable housing need of 556 households (842 less 286 = 556). However, depending on property types and size of households in need, a higher number of new homes may be needed to ensure there is no overcrowding.

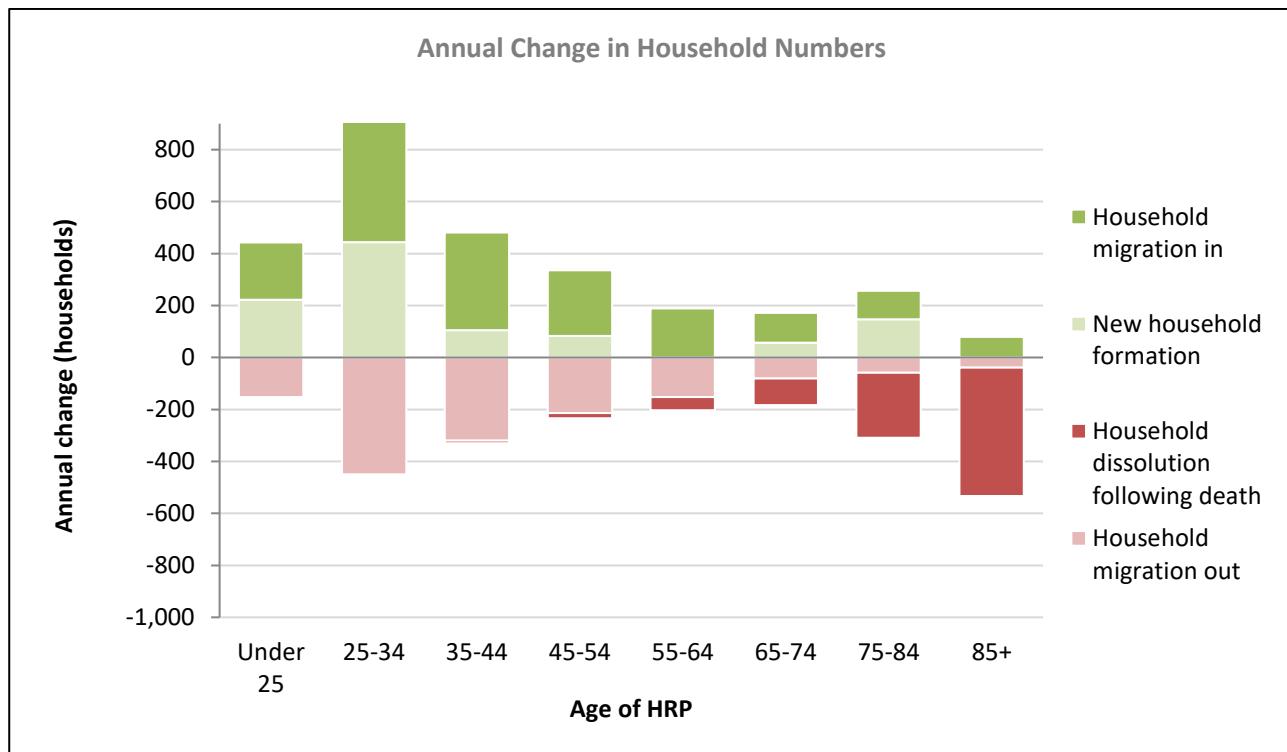
^{3.21} Providing the net affordable housing need for 556 households will release back into the market (mainly in the private rented sector) the dwellings currently occupied by a total of 484 households (556 less the 72 households which are homeless or concealed and thus do not release dwellings).

Projected Future Need of Households Unable to Afford

^{3.22} When considering the number of newly arising households likely to be in affordable housing need, the PPG recommends a “*gross annual estimate*” (ID 2a-021) suggesting that “*the total need for affordable housing should be converted into annual flows*” (ID 2a-024).

^{3.23} Figure 9 shows the age structure of each of the components of household change. This analysis is based on changes within each age cohort. Comparisons are based on households born in the same year and relate to their age at the end of the period. Therefore, all new households are properly counted, rather than only counting the increase in the number of households in each age group.

Figure 9: Annual change in household numbers in each age cohort by age of HRP in Darlington (Source: ORS Housing Model)



^{3.24} Together with information on household type, this provides a framework for the model to establish the proportion of households who are unable to afford their housing costs. The following tables looks at the impact of different types of household.

Figure 10: Annual components of Household Growth 2016-36 (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Newly forming households	977	657	320	33%
Households migrating into the area	1,858	1,341	517	28%
All new households	+2,835	+1,998	+837	30%

^{3.25} The ORS Model identifies 977 new households projected to form in Darlington each year, of which 33% will be unable to afford their housing costs. This amounts to 320 households each year.

^{3.26} The model also considers new households migrating to the area. The projection is for 1,858 households per annum of which 28% (517 households) will be unable to afford their housing costs.

^{3.27} **This results in a total of 837 new households in need of affordable housing** (Figure 10).

Figure 11: Annual components of Household Growth 2016-36 (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Household dissolutions following death	931	691	240	26%
Households migrating <u>out</u> of the area	1,468	1,062	406	28%
All households no longer present	+2,399	+1,754	+645	27%

^{3.28} PPG identifies that “there will be a current supply of housing stock that can be used to accommodate households in affordable housing need” and that it is necessary to establish “the number of affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households in need” (ID 2a-022).

^{3.29} The model identifies 931 households are likely to dissolve following the death of all household members. Many of these households will own their homes outright however, 240 of these are likely to have been unable to afford market housing and will mostly be living in social rented housing.

^{3.30} In addition, some households that are unable to afford housing are will migrate away from the area, so their needs should be discounted to ensure consistency with the household projections. The model identifies that 1,468 households will migrate out of the area each year, including 406 households who are unable to afford their housing costs. A proportion of these will vacate rented affordable housing (which will become available for another household) whereas others that have not yet been allocated an affordable home will reduce the number of households waiting. (It should be noted that some might have chosen to stay if housing costs were cheaper or more affordable housing was available).

^{3.31} **Altogether, there are 645 households who will vacate affordable dwellings or will no longer be waiting for a home** (Figure 11).

Figure 12: Annual components of Household Growth 2016-36 (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Existing households falling into need	-	-203	+203	100%
Existing households climbing out of need	-	+264	-264	0%
Change in existing households	-	+61	-61	-

^{3.32} PPG also identifies that it is important to estimate “*the number of existing households falling into need*” (ID 2a-021). Whilst established households that continue to live in Darlington will not contribute to household growth, changes in household circumstances (such as separating from a partner or the birth of a child) can lead to households who were previously able to afford housing falling into need. The needs of these households are counted by the model, and it is estimated that 203 established households will fall into need in Darlington each year.

^{3.33} However, established households' circumstances can also improve. For example:

- » When two single person households join together to form a couple, pooling their resources may enable them to jointly afford their housing costs (even if neither could afford separately).
- » Households also tend to be more likely to afford housing as they get older, so young households forming in the early years of the projection may be able to afford later in the projection period.

^{3.34} These improved circumstances can therefore reduce the need for affordable housing over time. The model identifies that the circumstances of 264 households will improve such that they become able to afford their housing costs having previously being unable to afford.

^{3.35} Therefore, considering the changing needs of existing households overall, **there is a net decrease of 61 existing households needing affordable housing each year** (Figure 12).

^{3.36} The following table (Figure 13) summarises the overall impact of

- » new households adding to housing need,
- » the households no longer present reducing housing need and
- » the changes in circumstances impacting existing households.

Figure 13: Annual components of Household Growth 2016-36 (Source: ORS Housing Model)

		All households	Households able to afford housing costs	Households unable to afford housing costs
All new households		2,835	1,998	837
All households no longer present		2,399	1,754	645
Change in existing households		-	+61	-61
Future affordable housing need 2016-36	Annual average	+436	+305	+131
	20-year Total	+8,716	+6,103	+2,612

^{3.37} Overall reviewing the contribution of each element amounts **to an additional 2,612 households needing affordable housing over the 20-year period 2016-36.**

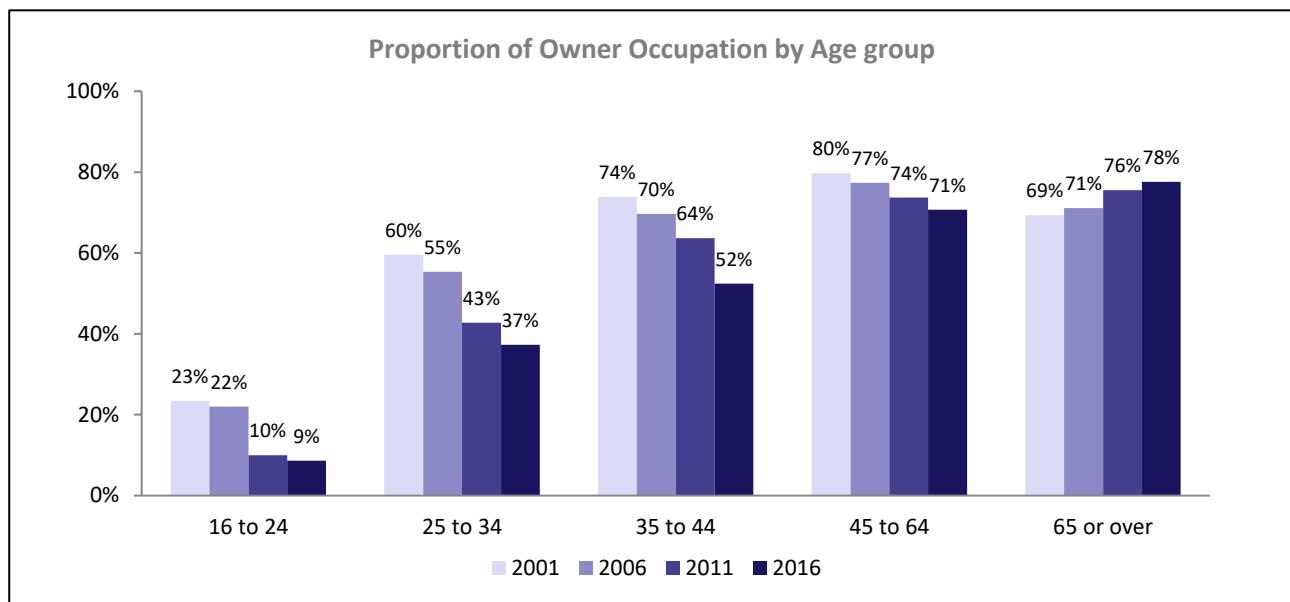
Needs of Households Aspiring to Homeownership

Home Ownership Trends

^{3.38} The new emphasis on households that cannot afford to own their home reflects Government concerns that the proportion of owner occupiers has reduced nationally over the last ten to fifteen years. Estimates from the English Housing Survey suggest that the proportion of owner occupiers reduced from around 69% in 2006 to 65% in 2011 and to 63% by 2016. Over the same period the proportion of households renting from a social landlord also reduced from 19% to 17% whilst the proportion renting privately increased from 12% to 20%.

^{3.39} The proportion of owner occupiers varies by age with younger age groups less likely to own their home than older households. The real change is in the extent to which younger age groups owning their property has fallen over recent years whilst at the upper end of the age scale (aged 65 or over) home ownership has been increasing (Figure 14).

Figure 14: Percentage of Owner Occupiers by Age Group 2001-2016 (Source: English Housing Survey)



Establishing the number of households aspiring to home ownership

^{3.40} English Housing Survey data shows that, unsurprisingly, 96% of households who currently own their property wish to stay as owner occupiers in the long term. In terms of potential demand over half (54%) of households who rent privately and almost a fifth (18%) of those in social rented housing aspire to homeownership.

Figure 15: Long-term aspirations (Source: English Housing Survey 2013/4)

Current Tenure	Long-term Tenure Plan				
	Owner Occupier	Shared Ownership	Rent from Private Landlord	Rent from Social Landlord	Other
Owner occupied	96.1%	0.4%	0.7%	1.1%	1.6%
Private rent	53.5%	2.6%	28.8%	11.4%	3.8%
Social rent	18.1%	1.8%	1.9%	77.0%	1.1%

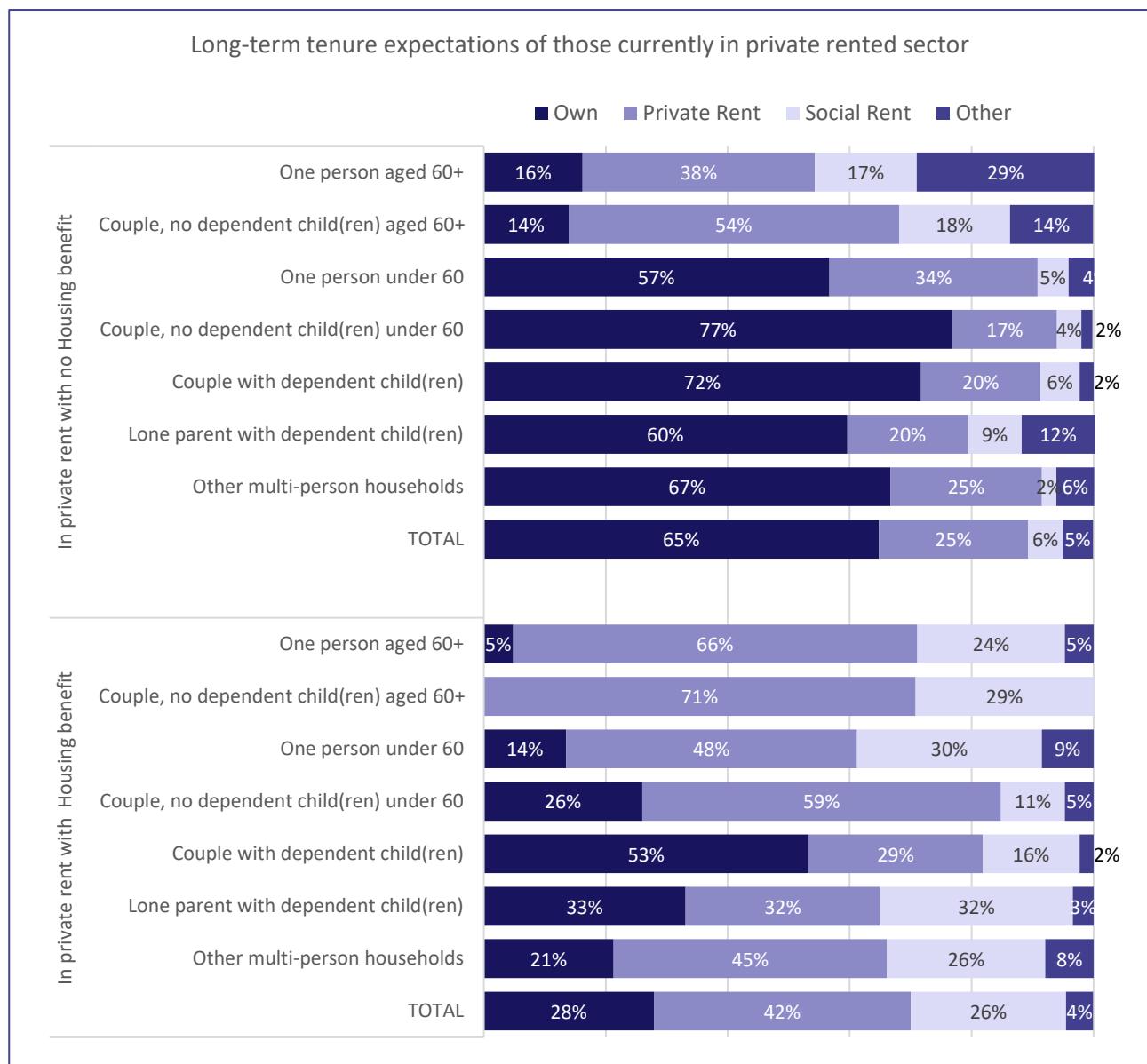
^{3.41} These figures relate to aspirations only and there is no test within the data as to whether this aspiration is affordable. It is therefore worth considering the responses of those currently in private rent in more detail with a view to understanding the types of household aspiring to buy.

^{3.42} The following chart (Figure 16) shows long-term tenure aspirations of those in private rent by household type as well as whether they are currently in receipt of housing benefit.

^{3.43} Almost two in three (65%) of those who are currently renting privately and NOT receiving housing benefit wish to buy their own home in the future. The proportion is much lower for those households with an HRP over 60 (averaging 15%) and slightly higher amongst couples under 60 (77% and 72% depending on whether or not there are dependent children in the household).

^{3.44} Just under three in ten (28%) of those households in the private rented sector and in receipt of housing benefit wish to buy their own home in the future. This increases to 53% of couples with dependent children.

Figure 16: Long-term Tenure Expectation for those in the Private Rented Sector with and without Housing Benefit support
 (Source: English Housing Survey 2013-14. Note: Own includes shared ownership)



Additional Need for Affordable Homeownership

3.45 Through combining data on the number of households of each type in each age group living in private rented housing and paying their own rent with the aspiration data from the EHS 2013-14, Figure 17 establishes the number of existing households likely to aspire to home ownership that have not been counted in the affordable housing need.

Figure 17: Households currently living in the Private Rented Sector and paying their own rent that aspire to home ownership
(Note: Figures may not sum due to rounding)

Household Type	Age of Household Representative						TOTAL
	15-24	25-34	35-44	45-54	55-64	65+	
Single person	200	541	234	106	16	24	1,122
Couple without children	71	347	80	109	78	23	708
Families with child(ren)	99	466	320	92	0	0	977
Other households	34	0	9	17	27	0	87
Total	404	1,354	643	325	121	47	2,894
<i>Percentage of households</i>	14%	47%	22%	11%	4%	2%	100%

3.46 Based on this analysis, we can estimate that there is a total of around 2,894 households currently resident in Darlington who cannot afford to own their own home but would aspire to do so. 61% of these households are aged 15-34 with the substantial majority (83%) aged under 45.

3.47 In addition to the current need, it is also important to consider new households that are projected to form over the period 2016-2036. Through combining this data with the aspiration data from the EHS, we can conclude that it is likely that there would be a further 2,116 households that form over the 20-year period who will be able to afford to pay market rent but unable to afford to own, despite that being their aspiration. **Overall, there are likely to be 5,010 households who aspire to homeownership but who cannot afford to buy their own home over the period 2016-36, a net annual need of 251 per year.**

3.48 When identifying the need for Affordable Home Ownership (AHO) including First Homes, it is necessary to consider the housing costs for both renting and buying market housing in order to understand the relative incomes required and establish the appropriate income range for AHO products and the associated purchase costs.

Identifying the Overall Affordable Housing Need

3.49 Figure 18 brings together the information on assessing the unmet need for affordable housing in 2020 together with the future need for affordable housing and those aspiring to home ownership arising over the 20-year period 2016-36. It can be noted that this assessment has no regard for whether those aspiring can access affordable home ownership options.

Figure 18: Assessing total need for affordable housing 2016-2036 (Source: ORS Housing Model)

	Affordable Housing Need		Overall Affordable Housing Need
	Households unable to afford	Households aspiring to home ownership	
Current housing need in 2016	556	2,894	3,450
Future housing need 2016-36	2,612	2,116	4,728
TOTAL HOUSING NEED	3,168	5,010	8,178

^{3.50} On this basis, we can conclude that the overall need for affordable housing would comprise a total of 8,176 households over the 20-year period 2016-2036, equivalent to an average of 409 per annum.

^{3.51} This represents a substantial proportion of the annual need of 459 dwellings. This is due to a large proportion of this need being associated with the whole population as opposed to the projected new households, which is recognised by the PPG:

How does the housing need of particular groups relate to overall housing need calculated using the standard method?

The standard method for assessing local housing need identifies an overall minimum average annual housing need figure but does not break this down into the housing need of individual groups. This guidance sets out advice on how plan-making authorities should identify and plan for the housing needs of particular groups of people.

This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method. How can needs of different groups be planned for?

Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- » *the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);*
- » *the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and*
- » *the anticipated deliverability of different forms of provision, having regard to viability.*

Planning Practice Guidance, ID 67-001-20190722

^{3.52} The size, type and tenure of homes also needs to be calculated separately from the standard method. PPG February 2019 states:

How does the housing need of particular groups relate to overall housing need calculated using the standard method?

The standard method for assessing housing need does not break down the overall figure into different types of housing. Therefore the need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately.

Planning Practice Guidance, ID 2a-017-20190220

^{3.53} Given that the need for affordable housing and affordable home ownership in particular is very high, it is necessary to consider how this need can be addressed within the overall need established.

^{3.54} It will be important for the local authority to plan for the needs of all households unable to afford to rent or own market housing if they are going to avoid the number of housing benefit claimants living in private rented housing increasing. This represents a need from 3,168 households.

^{3.55} It is important to recognise that the figures for those who aspire to home ownership are based upon those households who currently can afford market rent. But these households would not necessarily choose new

build Affordable Home Ownership if it was available, as some may prefer to secure full ownership in the less expensive second-hand housing market. Similarly, some households may not ultimately need affordable home ownership if their circumstances change to such a degree that they are eventually able to buy without financial assistance. It is also important to recognise that the identified demand could only be realised if Affordable Home Ownership products can be delivered at prices that are truly affordable in the area, in line with local house prices and incomes.

3.56 Neither the NPPF or PPG identify that any affordability criteria should be applied to those households who aspire to homeownership but cannot afford to buy their own home. However, it is appropriate to consider the extent to which these households could plausibly afford affordable homeownership products if they were provided. Whilst a range of affordable homeownership products are available, each with different costs and eligibility criteria, it is unlikely that housing would be delivered at values below 60% of newbuild prices.⁶ While 70% of market house prices is the maximum price suggested for a First Home in the consultation, a larger discount can be applied. However, if too large a discount is applied then this will significantly affect the viability of many schemes and lead to a reduction in the level of affordable housing which can be provided. Therefore, we have assumed a maximum discount of 40% on open market prices for properties which are compatible with the First Homes scheme.

3.57 Given this context, Figure 19 identifies those households with income that would be insufficient to afford 60% of newbuild prices at the lower quartile for the local area, and those households with savings of less than £5,000. This is based on further analysis of the EHS data which considers the income distribution and savings data for households that rent privately but aspire to homeownership. This data has been updated to reflect current income levels and scaled for each local area using indices from the ONS gross disposable household income (GDHI) tables.

3.58 Of the 5,010 households who can afford to rent but who aspire to homeownership and cannot afford to buy, there would be 1,130 where the household had insufficient income to have a realistic prospect of being able to afford at 60% of open market values (Figure 19). Of the remaining dwellings for households with incomes above the minimum threshold, there would be 2,523 where the household had savings of less than £5,000 and were therefore unable to afford the assumed deposit in the local area.

Figure 19: Affordable homeownership housing mix by household affordability to 2016-2036 (Source: ORS Housing Model)

	All households aspiring to home ownership	MINUS households unable to afford 60% of newbuild LQ	Households able to afford 60% of newbuild LQ	MINUS households with savings of less than £5,000	Households able to afford and have savings of £5,000 or more
1 bedroom	516	104	412	252	160
2 bedrooms	2,678	603	2,075	1,316	758
3 bedrooms	1,592	336	1,256	881	375
4+ bedrooms	223	86	137	73	65
TOTAL	5,010	1,130	3,880	2,523	1,358

3.59 On this basis, only 1,358 dwellings are needed for households that aspire to homeownership who have at least £5,000 in savings and incomes above the relevant threshold.

⁶ Developers will typically receive 50-60% of open market value when delivering Affordable Rented units

^{3.60} Whilst it will be a policy decision as to how much of the additional need for affordable homeownership from households able to afford market rent should be provided, it would seem appropriate to only plan for the needs of those 1,358 households likely to form an effective demand (i.e. those able to afford the various products that will be available) in addition to the 3,168 households unable to afford. Figure 20 provides a breakdown of the planned affordable housing on this basis.

Figure 20: Overall need for Affordable Housing, including aspiring households able to access affordable home ownership, by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

	Affordable Housing Need		Planned Affordable Housing
	Households unable to afford	Households aspiring to home ownership	
1 bedroom	437	160	596
2 bedrooms	1,218	758	1,976
3 bedrooms	1,267	375	1,642
4+ bedrooms	246	65	311
TOTAL HOUSING NEED	3,168	1,358	4,526

^{3.61} The LHNA identifies an overall affordable housing need from 4,526 households over the 20-year period 2016-36 (226 per annum). This includes the needs from all households unable to afford to rent or own market housing and also provide for those households who aspire to homeownership but who cannot afford to buy, where there is a realistic prospect of those households being able to purchase an affordable homeownership product.

^{3.62} However, it is important to recognise that there are many more households who aspire to homeownership who either do not have sufficient income or savings that would enable them to realise their aspiration. It is also important to recognise that these figures assume that the number of households in receipt of housing benefit to enable them to afford market housing in the private rented sector does not change. In determining the affordable housing requirement, the Council may want to consider these households alongside those households living in private rented housing who aspire to home ownership.

Size and Tenure Mix based Upon LHN

^{3.63} All data from this point onwards of the report now reference dwellings, not households. Therefore, we have taken the results from Figure 20 and applied a vacancy and second rate to them which allows us to calculate the number of dwellings required in Darlington. The totals therefore now match the annual need figure 459 dwellings per annum plus the equivalent of 33 dwellings for Class C2 per annum.

^{3.64} Whilst it will be a policy decision as to how much of the additional need for affordable homeownership from households able to afford market rent should be provided, it would seem appropriate to only plan for the needs of those households likely to form an effective demand (i.e. those able to afford the various products that will be available).

^{3.65} It would therefore seem appropriate for the local authority to plan to provide 1,394 dwellings for households aspiring to homeownership in addition to the 3,252 dwellings for households unable to afford. Figure 21 provides a breakdown of the Local Housing Need of 9,840 dwellings between market and affordable housing on this basis. In summary, there is a need for:

Social rented housing = 2,175 dwellings (22.1%) for households unable to afford affordable rent;

Affordable Rent = 1,077 dwellings (10.9%) for households that can afford affordable rent but unable to afford market rent;

Affordable home ownership = 1,394 dwellings (14.2%), for households that can afford market rent but aspire to homeownership and have reasonable prospect of being able to afford this;

Market housing = 5,194 dwellings (52.8%); and

Market housing includes an allowance for C2 provision within the total housing need of 9,840= equivalent to 660 dwellings that would be counted against the minimum LHN target.

Figure 21 Planned overall need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

	Affordable Housing			Total Affordable Housing	Total Market Housing	Total			
	Dwellings Unable to afford		Aspiring to Home Ownership						
	Social rent	Affordable Rent							
1 bedroom	384	64	164	612	-6	606			
2 bedrooms	828	423	779	2,029	884	2,913			
3 bedrooms	806	495	385	1,686	2,901	4,587			
4+ bedrooms	157	95	67	319	754	1,073			
DWELLINGS	2,175	1,077	1,394	4,646	4,534	9,180			
C2 Dwellings	-	-	-	-	660	660			
LHN	2,175	1,077	1,394	4,646	5,194	9,840			
Percentage Split	22.1%	10.9%	14.2%	47.2%	52.8%	100.0%			

^{3.66} The data indicates a split between affordable to rent and affordable to own of almost exactly 70:30. However, this must be placed in the context of local viability and policy considerations. In particular, the overall level of affordable housing need of 4,646 units is unlikely to be met, so Darlington will need to assess the relative priority given to different housing needs when setting policy targets.

Delivery 2016-2020

^{3.67} Figure 22 shows the that in the past 4 years, Darlington has achieved an average dwelling delivery of 452 per annum, which sits within the draft Local Plan dwelling requirement of 422-492 per annum. Affordable housing completions have been around 110 per annum, below the need figures set out in Figure 21. However, the delivery of affordable housing has been around 24% of the total dwelling delivery and is as high as could be expected given the levels of viability in Darlington.

Figure 22: Housing Delivery in Darlington 2016-2020 (Source: Darlington Borough Council. Note: Includes 49 Park Homes in the market total have been counted as 25 two bed and 24 three bed properties)

	Market Housing	Affordable Housing	TOTAL
1 bedroom	85	15	100
2 bedrooms	289	279	568
3 bedrooms	480	128	608
4+ bedrooms	515	19	534
TOTAL	1,369	441	1,810

Comparison with the 2015 SHMA Update

^{3.68} It is possible to compare Darlington Strategic Housing Market Assessment 2015 Part 1 – Objectively Assessed Needs with the figures set out above. Figure 53 of the SHMA 2015 (reproduced here as Figure 23) set out the size and tenure mix for the period 2011-36 for Darlington.

Figure 23: Housing mix of OAN for market and affordable housing 2011-36 (Source: Darlington Strategic Housing Market Assessment 2015 Part 1 – Objectively Assessed, Figure 53. Note: Figures may not sum exactly due to arithmetic rounding)

		Dwellings
MARKET HOUSING		
Flat	1 bedroom	28
	2+ bedrooms	265
House	2 bedrooms	1,915
	3 bedrooms	3,960
	4 bedrooms	870
	5+ bedrooms	89
	Total Market Housing	7,127
AFFORDABLE HOUSING		
Flat	1 bedroom	796
	2+ bedrooms	301
House	2 bedrooms	1,355
	3 bedrooms	1,368
	4+ bedrooms	214
	Total Affordable Housing	4,033
TOTAL		11,160

^{3.69} The SHMA 2015 assumed an overall annual housing growth rate of 446 dwellings per annum, with annual affordable housing need of 161 dwellings per annum which covered the need for affordable to rent and shared ownership properties. This represents 36% of the overall need. This current study has an affordable housing need to rent figure of 163 dwellings per annum which is 33% of the overall need.

^{3.70} These figures are comparable because they are both based upon households unable to afford the cost of market housing. However, this current study also includes the additional need from those who aspire to own, but who can afford to meet their own private rents. This amounts to a further 70 dwellings per annum which result from the need to consider private renters who aspire to own. Therefore, the additional affordable housing need contained in this study comes directly from the change in definition for affordable housing set out in Annex 2 of the NPPF 2018.

Appendix JS4

Independent News Article (June 2020)

Council housing sell-off continues as government fails to replace most homes sold under Right to Buy

Home ownership has fallen since the policy was introduced and flats are ending up in the hands of private landlords, writes **Jon Stone**



Sunday 21 June 2020 09:18

Two-thirds of the council homes sold off under [Right to Buy](#) are still not being replaced by new [social housing](#) despite a promise by the government, official figures show.

[Housing](#) charities warned that enough “desperately needed” genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock.

Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show.

Under [Right to Buy](#), the government sells off council housing at discounts of up to £100,000 to tenants.

Despite pitching the policy as a way to get more people on the property ladder, overall home ownership has actually fallen significantly since it was introduced in the 1980s.

Previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London.

Councils warned ministers when the policy was updated that the steep discounts meant the money would not be enough to replace homes one-to-one, and that the very existence of the policy undermined their ability to finance housebuilding by making it impossible to reliably borrow against future rents.

The government officially committed to replace the extra homes sold due to an increase in discounts in 2012-13, but housing charities say the affordable sector cannot afford to bleed stock at all. The government is still around 7,000 homes short of its own target, which covers construction up to the third quarter of 2016-17 because councils are given three years to replace the sold stock.

Jon Sparkes, chief executive at homelessness charity [Crisis](#), said: “These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this.

“People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.

“To address this, we need to see the government suspend Right to Buy going forward and prioritisation for social housing being given to people who are homeless so they are able to better access what is currently available. Alongside this, we also need commitment to build significantly more social homes in the coming years to keep in step with demand.

“Ending homelessness in the UK is completely within our grasp, but requires a rethink of existing policies that stand in the way.”

In 2018 Theresa May announced that a long-standing borrowing cap preventing councils from building more homes would be lifting. A survey by the Local Government Association

conducted in March 2019 found that a startling 93 per cent of councils were planning to use the extra headroom.

The Scottish and Welsh governments have already ended Right To Buy, citing its effect on the council housing stock.

Commenting on the Right to Buy figures, Polly Neate, chief executive of the housing charity [Shelter](#), said: “The coronavirus pandemic has drummed into us the importance of having a safe home like nothing before. By the same token it’s made it crushingly clear that not enough people do – including the million-plus households stuck on social housing waiting lists. Many of whom are homeless or trapped in grossly overcrowded accommodation right now.

“Despite being desperately needed, our recent track record on building new social homes is atrocious. There was actually a net loss of 17,000 social homes last year, and as it stands Right to Buy isn’t helping. While some people have benefited from the scheme, the failure to replace the properties sold has deprived many others of a genuinely affordable social home.

“But the status quo can be changed. As the government plots its economic recovery from coronavirus, it could give councils the means they need to replace and build social housing. As well as helping to create jobs and get housebuilding going again, this would offer all those without one, their best shot at a safe home.”

Asked about the figures, a spokesperson for the Ministry of Housing, Communities, and Local Government said: “The government is committed to Right to Buy, which has helped nearly two million council tenants realise their dream of home ownership and get on the property ladder.

“Since 2010 we have delivered more homes for social rent – over 140,000 in total – compared to the number of homes sold under the Right to Buy scheme.”

The ministry’s statement is misleading, however, as the 140,000 figure refers to all social housebuilding rather than those homes built to replace housing sold under Right To Buy using receipts earmarked for this purpose.

Appendix JS5

Affordable Housing as a Separate Material Consideration

Affordable Housing as a Separate Material Consideration

Appendix JS5

5.1 Regarding the weight to be attached to the proposed affordable housing benefits at the appeal site, as I set out in my Affordable Housing Hearing Statement, the need is acute, the benefits are considerable, and the weight in the planning balance should be **very substantial**. Affordable housing is a material benefit and should therefore be awarded its own weight in the planning balance.

5.2 Many appeal decisions issued by Inspectors and the Secretary of State ("SoS") have recognised affordable housing as an individual benefit and have specifically awarded affordable housing provision its own weight in the planning balance. Some examples are summarised below.

Appeal Ref.	Site Name	Decision Type	Decision	Date	Para Ref.	Weight to Affordable Housing	Paragraph Text
APP/R3650/W/23/3332590	Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold	Inspector	Allowed	08-May-24	48	Significant	<i>"I note that the Inspector in the 'Knowle Lane appeal' appears to have combined the benefits of market and affordable housing delivery when making his decision. Nonetheless, based on the evidence before me, the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs. Accordingly, the proposed provision of affordable housing also carries its own significant weight in favour of the appeal development."</i>
APP/F2360/W/22/3295498 and APP/F2360/W/22/3295502	Pickering's Farm Site, Flag Lane, Penwortham, Lancashire	SoS	Allowed	20-Nov-23	25	Significant	<i>"For the reasons given at IR343 the Secretary of State agrees that the delivery of a total of some 1,100 homes in a mix of sizes is a significant benefit, to which he gives significant weight. He further agrees that the delivery of affordable housing would be a benefit carrying significant weight."</i>
APP/C2741/W/21/3282598	Land to the East of New Lane, Huntington, York	SoS	Allowed	17-Oct-23	44	Very significant	<i>"He further agrees that the provision of 30% affordable housing, of a tenure and size to be agreed, would also be a very significant benefit of the scheme (IR380)."</i>
APP/Q3115/W/22/3296251	Land off Papist Way, Cholsey, Oxfordshire	SoS	Dismissed	10-Oct-23	26	Significant	<i>"For the reasons given at IR359 and IR390, the Secretary of State agrees that the benefits of affordable housing which the proposal would provide would comply with SOLP policy H9 and should be afforded significant weight."</i>
APP/C1570/W/21/3289755	Land East of Highwood Quarry, Park Road, Little Easton, Dunmow	SoS	Allowed	11-Sep-23	34	Great	<i>"For the reasons given at IR535 he agrees that the delivery of affordable housing is a benefit of great weight."</i>

APP/L5240/W/22/3296317	103-111a High Street, Croydon	SoS	Dismissed	06-Apr-23	25	Significant	<p><i>"For the reasons given at IR153 and IR168, the Secretary of State agrees with the Inspector that affordable housing delivery is a priority, and like the Inspector, he affords the provision of affordable dwellings significant beneficial weight (IR153)."</i></p>
APP/C2741/W/21/3282969	Site to the West of The A1237 and South of North Lane, Huntington, York	SoS	Allowed	14-Dec-22	27	Significant	<p><i>"For the reasons given at IR178 and IR196, the Secretary of State agrees that delivery of 30% affordable housing would be a further social and economic benefit to which significant weight should be attached."</i></p>
APP/M0655/W/17/3178530	Land at Peel Hall, Warrington	SoS	Allowed	09-Nov-21	24	Very substantial	<p><i>"He further agrees (IR524) that the provision of affordable housing attracts very substantial weight, for the reasons given."</i></p>
APP/A2280/W/20/3259868	Land off Pump Lane, Rainham, Kent	SoS	Dismissed	03-Nov-21	33	Substantial	<p><i>"...The Secretary of State considers that the weight to be afforded to the delivery of housing in the light of the housing land supply shortfall is substantial (all IR12.201). Similarly, the Secretary of State agrees at IR12.202 that for the reasons given there is an acute need for affordable housing and in light of that, the delivery of at least 25% of the residential units as affordable accommodation attracts substantial weight."</i></p>
APP/W1850/W/20/3244410	Land North of Viaduct adj. Orchard Business Park, Ledbury	SoS	Allowed	15-Mar-21	27	Substantial	<p><i>"For the reasons given in IR16.122-16.123, the Secretary of State also gives substantial weight to the delivery of affordable housing."</i></p>
APP/Y0435/W/17/3169314	Newport Road and Cranfield Road	SoS	Dismissed	25-Jun-20	32	Significant	<p><i>"Weighing in favour of the proposal, the Secretary of State affords the provision of affordable housing significant weight and also affords the provision of market housing significant weight."</i></p>
APP/E5330/W/19/3233519	Land at Love Lane, Woolwich	SoS	Dismissed	03-Jun-20	28	Substantial	<p><i>"The Secretary of State considers that, in terms of benefits, the provision of housing benefits and affordable housing benefits each carry substantial weight."</i></p>
APP/Q3115/W/19/3230827	Oxford Brooks University, Wheatley Campus	SoS	Allowed	23-Apr-20	35	Very substantial	<p><i>35 "...Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, that the delivery of up to 500 houses, 173 of which would be affordable, are considerations that carry very substantial weight."</i></p> <p><i>IR 13.111 "The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight irrespective of the fact that the Council can demonstrate a 3/5YHLS."</i></p>
APP/G1630/W/18/3210903	Land at Fiddington, Ashchurch near Tewkesbury	SoS	Allowed	22-Jan-20	20	Substantial	<p><i>"...The Secretary of State agrees with the Inspector, and further considers that the provision of affordable housing in an area with a serious shortfall would be of significant benefit and attracts substantial weight in favour of the proposal."</i></p>

APP/A0665/W/14/2212671	Darnhall School Lane	SoS	Dismissed	04-Nov-19	28	Substantial	<p><i>"The Secretary of State agrees that the social benefits of <u>the provision of affordable housing</u> should be given substantial weight, for the reasons set out at IR408-411."</i></p>
APP/P4605/W/18/3192918	Former North Worcestershire Golf Club, Hanging Land, Birmingham	SoS	Allowed	24-Jul-19	33	Significant	<p><i>30 "Weighing in favour the <u>Secretary of State considers that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.</u></i></p>
APP/E2001/W/18/3207411	Hutton Cranswick	Inspector	Dismissed	05-Jun-19	39	Significant	<p><i>"However, <u>aside from the provision of affordable housing (to which I attach significant weight)</u>, the provisions are essentially intended to mitigate the effect of the development-although they could be of some benefit to the wider public, and I have therefore given them very limited weight."</i></p>
APP/P0119/W/17/3191477	Coalpit Heath, South Gloucestershire	Inspector	Allowed	06-Sep-18	61	Substantial	<p><i>"There are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing(CBH). <u>They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply.</u> The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant –they would still comprise significant social benefits that merit substantial weight."</i></p>
APP/L3815/W/16/3165228	Land at the Corner of Oving Road and A27, Chichester	Inspector	Allowed	18-Aug-17	63	Substantial	<p><i>"Moreover, the provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently I attach substantial weight to this element of the proposal."</i></p>
APP/P1425/W/15/3119171	Mitchelswood Farm, Newick, Lewes	SoS	Allowed	23-Nov-16	18	Significant	<p><i>"For the reasons given at IR196-201 the Secretary of State agrees that <u>the provision of 20 affordable homes is a tangible benefit of significant weight.</u>"</i></p>
APP/G1630/W/14/3001706	Cornerways, High Street, Twyning	Inspector	Allowed	13-Jul-15	63	Very substantial	<p><i>"...Table 7.16 of the Strategic Housing Market Assessment [SHMA] Update [CDA17] identifies that the net annual need for affordable housing in Tewkesbury is 587 dwellings. This is more than twice the equivalent figure for the neighbouring District of Wychavon, despite the fact that Tewkesbury's population is little more than two thirds of that in Wychavon. <u>The Inspector in the Wychavon appeal found that the provision of affordable housing in that case: "...is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission", the Secretary of State agreed.</u> Given the much larger quantum of identified need in Tewkesbury and the magnitude of the accumulated shortfall in affordable housing delivery, <u>it would be appropriate to attribute very substantial weight to this important benefit of the proposal.</u>"</i></p>
APP/E2001/A/13/2200981 and	Brickyard Lane, Melton Park, East Riding	SoS	Dismissed	25-Jun-15	11	Substantial	<p><i>"However, he also agrees with the Inspector's conclusion that <u>substantial weight should attach to the proposals in proportion to the contribution they would make to the supply of affordable housing.</u>"</i></p>

APP/E2001/A/ 14/221394							
APP/K2420/A/ 13/2208318	Land surrounding Sketchley House, Watling Street, Burbage, Leicestershire	SoS	Allowed	18-Nov-14	13 / IR 6.19	Substantial	<p>13. "For the reasons given at IR11.20-IR11.23, the Secretary of State agrees with the Inspector's findings in relation to affordable housing, and with his conclusion at IR11.23 that the need for affordable housing is acute and warrants the provision offered by the appeal proposal."</p> <p>IR 6.19 "In those circumstances, there is no reason to depart from the statutory basis to providing for affordable housing set out in policy 15 of the Core Strategy. The policy takes account of the needs identified in the SHMA (2008) and was found to be sound by the Core Strategy Inspector. Hence, although <u>substantial weight should be given to the affordable housing offered</u>, that weight should not be overwhelming."</p>
APP/H1840/A/ 13/2199085 and APP/H1840/A/ 13/2199426	Pulley Lane, Droitwich Spa	SoS	Allowed	02-Jul-14	23 / IR 8.126	Very significant	<p>23. "For the reasons given at IR8.112-8.126, the Secretary of State agrees with the Inspector's conclusion at IR8.127 that the Council does not have a 5-year supply of housing land and the appeal scheme is necessary to meet the housing needs of the district, including the need for affordable housing."</p> <p>IR 8.126 "It seems to me that the Council has largely ignored the affordable housing need in its evidence. The poor delivery record of the Council has also been largely overlooked. The Council's planning balance is struck without any apparent consideration being given to one of the most important reasons why housing in Droitwich Spa is needed. <u>From all evidence that is before me the provision of affordable housing must attract very significant weight in any proper exercise of the planning balance.</u>[4.47]"</p>

Appendix JS6

Relevant Secretary of State and Appeal Decisions

Relevant Secretary of State and Appeal Decisions

Appendix JS6

6.1 Brief summaries of appeal decisions relevant to the appeal, are summarised below. The full decisions are included as Core Documents.

Appeal Decision: Land to the west of Langton Road, Norton (22 July 2016) – CD9.10

6.2 In their decision to allow the appeal the Inspector considered the benefits of policy compliant affordable housing provision where the Council could, in contrast to Tandridge District Council, show a five-year housing land supply.

6.3 The weight to be ascribed to policy compliant affordable housing provision is considered in paragraphs 66 and 67 of the decision.

'66. In relation to affordable housing, the position is agreed. Annual affordable housing requirements have not been delivered in full in Ryedale in each year of the plan period to date. The 2016 SHMA's redefinition of the threshold for affordable housing does not and cannot rewrite the repeated plaints in the Local Plan Strategy to the effect that the lack of affordable housing is the main imbalance in Ryedale's housing market, that Ryedale has an acute need for affordable housing and that increasing the supply of new affordable homes is a priority.

67. Policy SP3 seeks the provision of 35% of new dwellings as affordable housing on site for developments of more than 5 dwellings or on sites of 0.2ha or more. The appellant's uncontested evidence shows that over a ten-year period, Ryedale achieved 25%, increasing to 31% in a more recent five-year period but in the three years of the Local Plan Strategy's existence has delivered 60, 47 and 67 affordable dwellings against a target of 79 each year. It follows that the offer of 35% in the submitted Unilateral Undertakings, although no more than complying with policy, should be regarded as a considerable benefit (my emphasis).'

6.4 Paragraph 72 brings these points together and considers the purpose of affordable housing policies.

'72. On the other hand, in the light of the Council's track record, the proposals' full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit (my emphasis).'

Appeal Decision: Land off Aviation Lane, Burton-upon-Trent (October 2020) – CD9.29

6.5 This appeal considered the weight to be afforded to 128 affordable dwellings in the context of a shortfall in delivery against identified affordable housing need and an uncertain future supply.

6.6 Paragraph 5 states:

"5. The annual requirement for new affordable housing contained within the East Staffordshire Borough Council Local Plan 2015 (Local Plan) is 112 units. This is based on the findings of the Strategic Housing Market Assessment 2013, updated 2014 (SHMA). It is agreed within the Affordable Housing Statement of Common Ground (AHSOCG) that since the start of the plan period, 638 affordable dwellings have been completed, equating to 80 dwellings per annum, leaving a shortfall of 258 dwellings.

6. As well as the current shortfall, I understand that there are some 2,166 households on the Council's Housing Register. While the Council advised that not all are in priority need, which would relate to those with medical conditions, or homeless persons, all meet the relevant qualification criteria."

6.7 The Inspector goes on to state in paragraph 8 "*.... In my view, the extent of the shortfall and the number of households on the Council's Housing Register combine to demonstrate a significant pressing need for affordable housing now. As such, I consider that, the aim should be to meet the shortfall as soon as possible.*"

18. In coming to a view on this, I am mindful of the importance attached to the provision of housing and the requirement within paragraph 59 of the Framework to ensure that the needs of groups with specific housing requirements are addressed. In view of the significant number of households on the Council's Housing Register (which demonstrates a significant pressing need now) the current shortfall in affordable housing provision and the

worsening affordability factors, I consider that the development proposal would be a significant benefit in terms of helping to address the shortfall in the supply of affordable housing in the Borough in the short term that, based on the evidence before me, there is no certainty will be met from existing or future planning permissions.

...

52. ... *Indeed, the SOCG sets out agreement that the weight to be afforded to the provision of affordable housing is at least significant. On a straightforward development plan balance, I am firmly of the view that the provision of the affordable housing proposed is a significant material consideration which, in this instance, outweighs the development plan conflict* (emphasis mine).

Appeal Decision: Bullens Green Lane, Colney Heath (June 2021) – CD9.30

6.8 In discussing the provision of affordable housing on the Green Belt site and the weight that should be attributed to the affordable housing element, the Inspector articulates at paragraph 54 that:

“The persistent under delivery of affordable housing in both local authority areas presents a critical situation. Taking into account the extremely acute affordable housing position in both SADC and WHBC, I attach very substantial weight to the delivery of up to 45 affordable homes in this location in favour of the proposals.” (my emphasis)

6.9 Notably, when drawing their conclusions at paragraph 78, the Inspector asserts:

“The proposals would cause harm by reason of inappropriateness and harm to openness. Both of these attract substantial weight. I have also attached moderate weight to harm to the character and appearance of the area. However, these appeals involves two local authority areas, both of which have acute housing delivery shortages and acute affordable housing need. The proposals would make a contribution towards addressing these needs in the form of market, self build and affordable housing in both WHBC and SADC. I have attached very substantial weight to the provision of both market housing and affordable housing (my emphasis).”

Appeal Decision: Maitland Lodge, Billericay (November 2022) – CD9.37.

6.10 A Green Belt site proposal for 47 dwellings, including 21 (45%) affordable housing units at Maitland Lodge, Billericay was allowed at appeal in November 2022.

6.11 Giving evidence at the appeal I demonstrated a shortfall of almost 2,500 homes and a net delivery of affordable housing of just five dwellings per annum over the past seven years. The Inspector described affordable housing delivery in Basildon as “*abysmal*” with an “*acute and persistent*” shortfall. The Inspector recognised that the delivery shortfall represents a significant conflict with the NPPF, specifying that:

“Each of the 2,494 affordable homes that should have been built, but have not, represent a missed opportunity to help alleviate the housing concerns of individuals and families. The situation represents a significant conflict with the economic and social overarching objectives set out in paragraph 8 of the Framework.”

6.12 The Inspector went on to place very substantial weight on the delivery of the proposed affordable housing at the site, stating:

“The proposed provision of 45% of total units, at 21 homes, is in excess of the policy requirements. However, given the critical situation regarding affordable housing delivery in the Borough, I place very substantial positive weight on all of the proposed affordable homes, not just those over and above policy requirements.” (my emphasis)

Appeal Decision: Land at Witney Road, Ducklington (January 2023) – CD9.36

6.13 At this appeal in Oxfordshire delivering 40% policy-compliant affordable housing (up to 48 affordable homes), the Inspector considered the role of open market-led housing development in delivering affordable homes in West Oxfordshire.

6.14 At paragraph 102 at page 14 of the decision, the Inspector noted that:

“The Council acknowledged that it relies upon the delivery of market housing to provide affordable homes. Such delivery is being impaired by the inadequate housing land supply provision and as I found earlier is unlikely to be remedied in the near future”.

6.15 The Inspector went on to consider evidence of past shortfalls of affordable housing delivery, alongside affordability indicators including long waits for allocation and lengthy Housing Register figures. Paragraph 103 at page 14 states that:

*“When assessed against the 2014 SHMA target there is 6 years of under delivery and 2 years of surplus but an overall significant shortfall. According to the Council’s own most recent figures, **there are 2,985 applicants on the Council’s housing register. Waiting times are between 721 days and 1,027 days according to the size of the dwelling. I find the affordable housing shortfall is substantial** (emphasis mine)”.*

6.16 At paragraph 103, the Inspector noted the real-world impact of these affordability problems, explaining that:

“These figures represent people lacking suitable housing everyday of their lives, resulting in impaired quality of life and challenges for health and wellbeing.”

6.17 At paragraph 105, the Inspector reaches a conclusion on weight and in doing so, supported the evidence of the Appellant, setting out that *“I therefore conclude that the proposal should be afforded the substantial weight suggested by the appellant* (my emphasis).”

Appeal Decision: Land at Little Bushey Lane, Bushey (July 2023) – CD.9.2

6.18 In reaching an appeal decision, the Inspector concluded that the provision of affordable housing (above policy compliant affordable housing provision at 40% equivalent to 124 units) should be afforded very substantial weight:

“111. For affordable housing, the picture is no less bleak. The South West Hertfordshire Strategic Housing Market Assessment 2016 (SHMA) identifies an annual need for 434 net affordable dwellings between 2013 and 2036, while the South West Hertfordshire Local Housing Need Assessment 2020 (LHNA) refers to an annual need for 503 affordable dwellings between 2020 and 2036. Data from the Department for Levelling Up, Housing and Communities shows that at 31 March 2022, 799 households were on the Housing Register. It is agreed in the Affordable Housing SOCG (3 May 2023) that from 2013/14 onwards, net affordable housing completions have averaged 54 per year compared to the SHMA need for 434 net affordable dwellings. This results in an average annual shortfall of 380 affordable homes. Affordable housing forms just 14% of housing completions, against CS Policy CS4’s target of 35%.

112. Even bearing in mind any affordability issues addressed by the standard method and the policy-off nature of the SHMA and LHNA figures, there is a

pressing, persistent and acute need for affordable housing within Hertsmere, which should be addressed as a matter of urgency. This is an area where house prices are well in excess of the national or even the East of England average, and where rents are rising. The ongoing shortfall of affordable housing would have real consequences, either in terms of homelessness or people living in unsuitable accommodation. In the context of paragraph 8 of the Framework, such a shortfall and the likely inadequate future supply fails to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations.”

Appeal Decision: Land at Sondes Place Farm, Westcott Road, Dorking (December 2023) – CD9.3

6.19 A recent appeal decision in Mole Valley District concluded that very substantial weight should be given to the provision of affordable housing in paragraphs 88 and 89:

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

89. The proposal would deliver up to 72 affordable homes with a suitable tenure split, which exceeds the 40% on site provision that Core Strategy Policy CS 4 requires. The s106 agreement secures the provision and tenure split. The affordable homes would make a sizeable contribution to addressing the acute and long-established shortfall which will not be fully addressed in the short term. I give the affordable housing provision very substantial positive weight (my emphasis).”

Appeal Decision: Land South of Shenley Road, Radlett (January 2024) – CD9.31

6.20 The appeal was refused on grounds other than affordable housing, the Inspector agreed with the submissions I made in relation to affordable housing and the weight to be attached to the delivery of affordable housing on a site located within the Green Belt.

6.21 The Inspector addresses affordable housing in paragraphs 61 to 65 of their decision:

*"64. I accept that **such a serious shortfall to provide AH units has serious real-world effects, which impact by definition on the poorest and neediest families in the Borough. The effect of poor housing on children has a serious effect on their educational attainment, which in turn perpetuates the cycle of built-in poverty and poor life prospects.***

*65. Accordingly, and in the context of net annual delivery figures of only 54 AH units over the last ten years in HBC, **I give very substantial weight to this benefit** (my emphasis)."*

Appeal Decision: Land lying to the east of Hartfield Avenue and fronting on to Barnet Lane, Elstree, Hertfordshire (March 2024) – CD9.32

6.22 The Inspector considers the weight to be afforded to affordable housing the context of limited prospects of meeting the identified need in paragraphs 130 to 133.

"Affordable housing

*132. **However, since that date, net delivery has decreased, and the shortfall has increased. It is telling that as little as 14% of total housing completions have been affordable and future prospects offer no solace to a mounting problem.***

*133. On this basis and taking account of the totality of Appellant's undisputed evidence, the anticipation of up to 33 affordable units being delivered within the five-year period also merits **very substantial weight** (emphasis mine)."*

Appeal Decision: Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold (May 2024) – CD9.11

6.23 The Inspector considers the weight to be given to affordable housing as separate material benefit in paragraphs 47 and 48 of their decision.

'47. The appeal scheme would also deliver 16 affordable homes at the site. The evidence indicates that there is substantial unmet need for affordable housing in the Borough.'

48. I note that the Inspector in the 'Knowle Lane appeal' appears to have combined the benefits of market and affordable housing delivery when making his decision. Nonetheless, based on the evidence before me, the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs. Accordingly, the

proposed provision of affordable housing also carries its own significant weight in favour of the appeal development (my emphasis).'

Secretary of State Decision: Land adjacent to Turnden, Hartley Road, Cranbrook (November 2024) – CD9.20

6.24 Application reference 20/00815/FULL was called in by the previous Secretary of State on 12 April 2021 and dismissed on 6 April 2023. That decision was subsequently quashed by the High Court in an order dated 6 October 2023. The therefore fell to be redetermined by the Secretary of State and the decision to grant planning permission was issued in November 2024.

6.25 In paragraph 42 of the decision housing need and delivery were considered along with the change in conditions since the previous decision was made. The relevance of paragraph 42, and the decision as whole, being that Tandridge District Council is similarly an authority where land and sites are restricted principally by landscape designations.

'42. In reaching her conclusions on housing need and delivery, the Secretary of State has taken into the account the effect of paragraph 226 of the Framework, which means that TWBC can now demonstrate a Framework-compliant housing land supply, and the progress of the eLP since the previous decision. As a result, she considers that some elements of the Inspector's conclusions at IR801-810 in respect of housing need and delivery are now out of date. However, it is undoubtedly still the case that the ability to respond to the need for housing is heavily constrained (IR803), and on the basis of the evidence now before her, in particular the significant weight which she attaches to policy STR/CRS 1 and draft allocation AL/CRS3 of the eLP, she agrees with the Inspector at IR810 that it is reasonable to conclude that there is a compelling case for the need for development of this type and in Cranbrook. She further agrees that there are considerable benefits associated with delivering market and affordable housing (IR810). In reaching this conclusion she has taken into account paragraph 60 of the Framework which sets out the Government's objective of significantly boosting the supply of homes. The Secretary of State considers that the delivery of 165 homes (40% affordable housing) carries significant weight (emphasis mine).'

Appeal Decision: Land at The Old Cottage, Station Road, Lingfield RH7 6PG (October 2023) – CD9.2

6.26 In a dismissed appeal on a Green Belt site in Tandridge the Inspector considered the need for affordable housing in Tandridge. Paragraph 89 of the Inspector's decision summarises the evidence of affordable housing need and delivery with reference to the Council's Housing Strategy, Housing Register, and Authority Monitoring Reports concluding that '*it is unsurprising that there is a significant need for affordable housing.*'

6.27 The Inspector comments on the Council's efforts to increase the supply of affordable housing in paragraph 90:

'I was referred to the District Council's commendable efforts to increase the supply of affordable housing through amongst other things its own land assets, the scale of what is being envisaged would make relatively little inroads into the substantial scale of need identified. Particularly, when on closer scrutiny some of the schemes referred to are already accounted for in the housing trajectory in the AMR. Overall, there remains a pressing and acute need for affordable housing within the District (my emphasis).'

6.28 Notably, at paragraph 107, the Inspector considered the weight to be ascribed to affordable housing provision in the context of the likely timeframe for the adoption of the emerging Local Plan, the now withdrawn Tandridge Local Plan 'Our Local Plan: 2033'.

'In relation to general housing and affordable housing delivery I have arrived at a different conclusion of very significant weight (as opposed to significant weight) mainly because of the situation with the eTLP examination and the ramifications that there will now be a further hiatus before there is any plan-led grip on meeting the housing requirement in Tandridge.'

Appeal Decision: Land at Chichele Road, Oxted, RH8 0NZ (December 2024) – CD9.1

6.29 The appeal concerned a site located within the Green Belt outside the settlement boundary of Oxted, Tandridge. In paragraph 77 of their decision the Inspector agreed with the appellant that '*... it will still be several years until a new Local Plan is adopted*' and therefore the prospect of a new Local Plan does not alleviate '*...the problems associated with an under supply of housing (including difficulties with accessing housing, increased house prices, worsening affordability...).*'

6.30 The Inspector highlighted the need for affordable housing in Tandridge in paragraph 79 and 80 of their decision.

'The presented evidence also clearly demonstrates that there is an acute shortage of affordable housing within the District. Again, I acknowledge the efforts engaged by the Council to provide additional affordable homes but, these are unlikely to suffice on their own to address the scale of the shortfall (my emphasis).'

6.31 The Inspector went on in paragraph 80 to ascribe 'very significant weight' to the provision of market and affordable housing in light of the '*critical housing supply and delivery issues faced by the Council...*'

Appeal Decision: Land West of Limpsfield Road, Warlingham CR6 9RD (April 2023) - CD9.33

6.32 In allowing an appeal against Tandridge District Council's non-determination of an outline application on a Green Belt Site the Inspector considered the need for and delivery of affordable housing in the District. The appeal scheme proposed up-to 100 dwellings of which 40% would be affordable housing.

6.33 The Inspector highlights the status of the Interim Policy Statement for the Housing Delivery ('IPSHD') in paragraphs 60 to 62 of their decision, noting that:

'61. The IPSHD sets out that applications will be invited to come forward in certain circumstances including housing sites included in the emerging Local Plan where the examiner did not raise concerns. The Council's evidence at the Inquiry stated that the appeal site would meet the criteria in the IPSHD.

62. However, the IPSHD does not form part of the development plan nor is a supplementary planning document, that has been subject to public consultation. Therefore, whilst it is matter to which I can only give limited weight, given its non-statutory status, it is nonetheless a matter which weighs in favour of the proposal.'

6.34 Affordable housing is considered in paragraphs 68 to 72 of the decision. The Inspector acknowledged '*uncontested affordable housing evidence from the appellant which demonstrates an enormous shortfall in delivery of homes over the next 5-year period equating to about 53 affordable homes per annum (my emphasis).*'

6.35 Paragraph 70 of the decision states that the provision of affordable housing in excess of the requirements of Policy CSP4 was agreed by the parties to carry significant weight in favour of the scheme. Notably, the Inspector affords '*substantial weight*' to the housing benefits of the appeal scheme in paragraph 95 of the decision; the only

other material consideration ascribed substantial weight in the decision was the harm to the Green Belt.

6.36 The Inspector concludes in paragraph 72 that:

'In summary, the evidence before me demonstrates an ongoing acute and continuing extremely bleak outlook for local affordable housing provision. The capability of the appeal proposal to contribute significantly to addressing the existing and predicted very serious affordable housing shortfall within the next 5 years attracts significant weight in favour of this appeal (my emphasis).'

Appeal Decision: Land West of Chapel Road, Smallfield, Surrey RH6 9JH (June 2025) – CD9.15

6.37 The Inspector allowed an appeal against Tandridge District Council's refusal to grant planning permission for up to 270 dwellings, including 49% to be provided as affordable housing, on a site within the Green Belt.

6.38 Paragraph 58 provides that '*Given the need for affordable housing in Smallfield, and in Tandridge generally, the Council and the appellant agree that significant weight should be attached to the delivery of affordable housing. I agree.*'

6.39 In paragraph 71 the Inspector recognised the appeal scheme complied with the 'Golden Rules' and that they '*have given significant weight to affordable housing*'. Paragraph 94 clarifies that the Inspector ascribed significant positive weight to the provision of affordable housing as a separate and distinct benefit, with significant weight being the greatest weight given to any of the material considerations identified in their decision.

Appeal Decision: Land at Grove End, Bagshot (March 2025) – CD9.34

6.40 In an appeal for 135 dwellings in the Green Belt the Inspector considered the benefits of affordable housing provision in excess of policy requirements. In reaching their decision the Inspector considered the indicators of affordable housing need.

6.41 Paragraph 32 of the decision notes '*Of the total number (409), around 215 have expressed a preference to live in the Bagshot area, indicating that it is a popular place to seek to live.*' Paragraphs 33 and 34 continue:

'33. On the point of stock numbers overall, the losses through Right to Buy appear only modest, but I agree with the separate point about needing to avoid an overreliance on the private rental sector to address affordable housing needs. The affordability ratios

are also emphasised, with the Surrey Heath area having a substantially above national median affordability ratio, also still significantly higher than the South East median.

34. All the above factors point towards an identifiable need for affordable housing, and though the Council dispute the severity of the need, the basic point about there being a need for affordable housing is a point which both parties at least agree. I reach the same view that an affordable housing for a range of tenures exists.'

6.42 The weight to be ascribed to affordable housing and compliance with the Golden Rules is considered in paragraph 57 of the decision.

'The significant weight to be attached to the compliance with the Golden Rules prescribed by the Framework recognises the minimum 50% contribution of affordable housing, which in this case exceeds the 40% existing policy requirement. There is demand for affordable homes in the area which such a provision would help to meet.'

Overview of Secretary of State and Appeal Decisions

6.43 The decisions above emphasise the great weight which the Secretary of State has, on various occasions, attached to the provision of affordable housing in the consideration of planning applications. Inspectors have agreed that affordable housing is a significant benefit in its own right. Some of the key points I would highlight from these examples are that:

- Affordable housing is an important material consideration;
- The importance of unmet need for affordable housing being met immediately;
- Planning Inspectors and the Secretary of State have attached **very substantial weight** to the provision of affordable housing; and
- Even where there is a five-year housing land supply material benefits of the scheme can weigh in favour of development.