

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

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Nutfield Green Park, Nutfield, Surrey

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Outline planning permission for the development of the site for new homes (Use Class C3) and Integrated Retirement Community (Use Classes C2, E(e), F2), creation of new access, landscaping and associated works to facilitate the development, in phases which are severable (Outline with all matters reserved, except for Access).

Nutfield Green Park, Nutfield, Surrey

For and on behalf of Nutfield Park (Developments) Ltd

February 2026

PINS REF: APP/M3645/W/25/3374913

LPA REF: TA/2023/1281

OUR REF: M25/1205-01.RPT

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- CD10.23 APP/N1920/W/24/3346928 - Land at Barnet Lane and Furzehill Road, Borehamwood, Hertfordshire
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- CD10.30 APP/L3815/W/16/3165228 - Land at the corner of Oving Road and A27, Chichester, P020 2AG
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- CD10.33 APP/Y3940/W/21/3278256 and APP/Y3940/W/21/3282365: Land at Filands Road/Jenner Lane, Malmesbury, SN16 9HZ (January 2022)
- CD10.34 APP/Y2736/W/15/3136237 AND APP/Y2736/W/15/3136233 - Land to the west of Langton Road, Norton
- CD10.35 APP/R3650/W/23/3332590 - Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold GU8 4NB
- CD10.36 APP/M2270/W/21/3282908 - Land to the East of Highgate Hill and South of Copthall Avenue, Hawhurst, Kent, TR18 4LR
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- CD10.40 APP/M3645/W/22/3309334 - Land West of Limpsfield Road, Warlingham CR6 9RD
- CD10.41 APP/D3640/W/24/3347530 - Land at Grove End, Bagshot
- CD10.42 APP/N1920/W/23/3314268 - Land at Little Bushey Lane, Bushey
- CD10.43 APP/D3125/W/22/3297487 - Land at Witney Road, Ducklington, Oxfordshire
- CD10.44 APP/V1505/W/22/3296116 - Maitland Lodge, Southend Road, Billericay, CM11 2PT
- CD10.45 APP/M2270/V/21/3273015 - Land adjacent to Turnden, Hartley Road, Cranbrook, TN17 3QX
- CD10.46 APP/M3645/W/23/3319149 - Land at The Old Cottage, Station Road, Lingfield RH7 6PG
- CD10.47 APP/M3645/W/24/3345915 - Land at Chichele Road, Oxted, RH8 0NZ
- CD11.17 Iain Warner Proof of Evidence (Older Persons Housing)
- CD12.1 Council's Statement of Case

# Executive Summary

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- 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 166 dwellings and 41 extra care units. The 41 extra care units are considered in the evidence of Mr Iain Warner (**CD11.17**).
- iii. Of the 166 (C3) dwellings and 41 extra care units 50% will be affordable. This level of provision exceeds the requirements of Policy CSP4 (34%) of the adopted Core Strategy 2006-2026, with the (15%) uplift required by the Golden Rules under paragraphs 157 and 158 of the NPPF 2024.
- iv. The tenure split for the affordable housing provision for the C3 dwellings will be 75% Affordable Rent/Social Rent and 25% Shared Ownership to meet the range of Affordable Housing needs in the locality, as agreed between the Appellant and the Council.
- v. The affordable housing provision will be secured through a Section 106 agreement.

## **Key Findings**

### **Corporate Documents**

- vi. Corporate documents identify the delivery of affordable housing as a high corporate priority of Tandridge District Council. These include the:
  - a. Corporate Plan 2024 to 2028 (**CD6.26**);
  - b. Homelessness Prevention and Rough Sleeping Strategy 2019-2023 (extended to 2025) (**CD6.27**); and the
  - c. Tandridge Housing Strategy 2019-2023 (**CD6.28**).

### **Affordable Housing Needs**

- vii. 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 2006/07 and 2012/13.

- viii. The 2015 AHNA identifies a need for 456 affordable homes per annum between 2015/16 and 2019/20.
- ix. 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.
- x. As agreed in the Affordable Housing Statement of Common Ground (**CD8.4**), the 2018 AHNA is not an up-to-date or NPPF compliant assessment of affordable housing need in the District.

### **Affordable Housing Delivery**

- xi. In the 19-year period, for which data is available, since the start of the Core Strategy period in 2006/07, net of Right to Buy affordable housing delivery represented just 24% of overall housing delivery, equating to just 58 affordable dwellings per annum.

### **Affordability Indicators**

- xii. The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Tandridge 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 31 March 2025 105 registered households indicated they would consider an affordable home in Nutfield; this represents 6% of the total housing register.
- Between 1 April 2024 and 31 March 2025 there were just 3 Social Housing Lettings in Nutfield.

#### Housing Register Bids and Lettings

- 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.

- Between 1 April 2024 to 31 March 2025 there were an average of 130 bids per 1-bed affordable dwelling put up for let in Nutfield, 203 average bids per 2-bed affordable dwelling and 137 average bids per 3-bed affordable dwelling, and no 4+ bed affordable dwellings were advertised.

#### Temporary Accommodation

- The Council's FOI response (**Appendix JS1**) provides that that on 31 March 2025, there were 53 households housed in temporary accommodation by the Council. Of whom 7 households were housed outside the District up from a single household on 31 March 2024.
- MHCLG data shows that of the 53 households in temporary accommodation 42 (79%) were households with children. The Council has a responsibility to house these households. It is notable that 27 (64%) of the 42 households with children had been in temporary accommodation for more than six months, 23 (55%) for at least a year, and 12 (64%) for between two and five years.
- The regulatory judgement of the Regulator of Social Housing, published 17 September 2025 (**Appendix JS7**), was accompanied by a grading of C4, which 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...*'

#### Homelessness

- MHCLG statutory homelessness data shows that in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 197 households in need of homelessness prevention duty<sup>1</sup>, and a further 89 households in need of relief duty<sup>2</sup> from the Council.

#### 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.

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<sup>1</sup> 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 homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

<sup>2</sup> 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.

- 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**. 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 99% from £246,500 in 2006 to £490,000 in 2025. This figure is strikingly above (63% higher) the national figure of £300,000, which has seen an increase of 88% over the same period and 28% higher than the South East figure of £384,000 which has seen an increase of 99% over the same period.
- The median house price across the Nutfield and Bletchingley MSOA has risen by 116% from £250,000 in 2006 to £540,000 in 2025. This represents a significantly greater rate of increase over the period than observed in Tandridge (+99%) and the South East (+99%).

### 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 32% increase since the start of the Core Strategy period in 2006 when it stood at 11.37.
- 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 99% from £188,500 in 2006 to £375,000 in 2025. This compares to a 92% increase across the South East and a national increase of 75% 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 Nutfield and Bletchingley MSOA (Tandridge 008) has risen by 98% from £215,000 in 2006 to £425,000 in 2025. This figure is 13% higher than the Tandridge figure of £375,000, (which has seen an increase of 99% over the period) and 49% higher than the South East figure of £284,838 (which has seen an increase of 92% over the period).

### **The Future Supply of Affordable Housing**

- xiii. In the first seven years of the 2018 AHNA period, the Council have overseen the delivery of 385 affordable homes (net of Right to Buy) against a need of 2,575 net new affordable homes, which has resulted in a shortfall of -2,190 affordable homes.
- xiv. 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 PPG<sup>3</sup> and endorsed at appeal.
- xv. 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 142% to 749 net affordable homes per annum over the period. This would ensure that for the remainder

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<sup>3</sup> Paragraph: 022 Reference ID: 68-031-20190722

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.

- xvi. 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 in the Council's latest supply of 2,158 dwellings would provide policy compliant levels of affordable housing, there is a possible supply of just 147 new affordable dwellings per annum.
- xvii. If we were to assume that the past gross affordable housing provision of 27% is to be continued over the next five years, this is likely to deliver only 583 affordable dwellings over the period, equating to a much lower affordable housing future supply of just 117 new affordable dwellings per annum.
- xviii. These figures fall very substantially short of the 749 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**

- xix. 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 50% of the appeal scheme, up to 166 C3 dwellings and up to 41 C2 extra care units, as affordable dwellings in the planning balance.

# Introduction

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## Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by **James Stacey BA (Hons) DipTP MRTPI** of **Tetlow King Planning** on behalf of **Nutfield Park (Developments) Ltd**.
- 1.2 The proposed development seeks Outline planning permission is sought for *‘the development of the site for new homes (Use Class C3) and Integrated Retirement Community (Use Classes C2, E(e), F2), creation of new access, landscaping and associated works to facilitate the development, in phases which are severable (Outline with all matters reserved, except for Access).’*
- 1.3 The appeal scheme includes 50% on site affordable housing provision which exceeds the requirements of Policy CSP4 (34%) of the adopted Core Strategy 2006-2026, with the (15%) uplift required by the Golden Rules under paragraphs 157 and 158 of the NPPF 2024.
- 1.4 The tenure split for the affordable housing provision has been agreed with the Council as being set at 75% Affordable Rent/Social Rent and 25% Shared Ownership to meet the range of Affordable Housing needs in the locality. The proposed affordable housing will be secured by way of a section 106 planning obligation.
- 1.5 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision<sup>4</sup> considering evidence of need in the area. It should be read alongside Appellant’s Planning Evidence and Housing Land Supply Evidence.
- 1.6 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”).

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

- 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.
- During my career I have presented evidence at more than 170 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.

1.7 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."*

1.8 I further confirm that none of this evidence has been produced with the use of AI technology.

1.9 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 (**CD5.17**).

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

- 1.11 As part of my evidence, I have sought data from the Council, upon which I rely, through a 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; the Council issued a further clarification on 18 December 2025. The full FOI correspondence is attached at **Appendix JS1**.
- 1.12 For clarity, the Council’s planning/affordable housing evidence in an ongoing appeal (Oxted Appeal reference: APP/M3645/W/25/3372747), where I have also provided affordable housing evidence, indicated that it (the Council) relies on completions data from Authority Monitoring Reports (‘AMR); consequently my evidence utilises these figures rather than those provided in the Council’s FOI response (**Appendix JS1**), with the exception of local housing completion data, which is not included in the AMR data.
- 1.13 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 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

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## 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)

- 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. ,

- 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 (including Social Rent)...”* (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 The December 2024 version of the NPPF has introduced “Golden Rules” at paragraph 156 for major development involving housing provision, which is proposed on sites which are either released from Green Belt through a Development Plan or on sites presently within the Green Belt that are subject to a planning application. In situations where the Golden Rules are complied with, 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”*.

- 2.11 Under paragraphs 67 and 68 of the NPPF, updated Development Plan policies should set a higher affordable housing requirement for sites that have been released from the Green Belt or are proposed on land which is presently Green Belt. This should be at least 50% affordable housing unless this is unviable.
- 2.12 Where Development Plan policies have not yet been updated paragraph 157 requires an uplift in affordable housing provision of at least 15 percentage points above the existing Development Plan policy, to a cap of 50%:

*“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%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.”*

- 2.13 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).

***“Building the Homes We Need” Written Ministerial Statement (30 July 2024)***

- 2.14 On 30 July 2024, the 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.
- 2.15 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 (12 December 2024)**

- 2.16 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)

**Planning Practice Guidance (March 2014, Ongoing Updates)**

- 2.17 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**

- 2.18 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

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## Section 3

### Introduction

- 3.1 The National Housing Strategy<sup>5</sup> sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 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 over a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Tandridge.
- 3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:
- “I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”*
- 3.4 When asked to clarify the word “*crisis*” by the MP for Tewkesbury, Nick Boles, commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.

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<sup>5</sup> Laying the Foundations: A Housing Strategy for England (November 2011)

3.5 In response to questions, Nick Boles reaffirmed that:

*“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.*

3.6 He went on to say: *“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”*

3.7 Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

3.8 Mr Boles indicates that there are *“a lot of statistics to prove it.”* My evidence in subsequent sections sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now as it did in 2013.

3.9 Moving forward over a decade and a new Government, we see even more alarming comments from the Housing Minister, Matthew Pennycook. On 20 November 2024, the Minister addressed the Housing, Communities and Local Government Committee: He began with a powerful reminder:

*“We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates.”*

3.10 He went on to say:

*It is not just the lives it blights; it is also the impact on our economy. We are all suffering. The public services we rely on, for example, are harmed by the fact that we are consuming ever larger amounts of public money in the form of the rapidly rising housing benefit bill. The situation that we are in also hampers economic growth and productivity. It constrains the ability of our great towns and cities to realise their full potential. We are taking decisive action to tackle the housing crisis and boost economic growth.*

### **Consequences of Failing to Meet Affordable Housing Need**

- 3.11 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.
- 3.12 In August 2019 the Children’s Commissioner produced a report titled “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” to investigate the impact of homelessness and in particular the effect of this upon children.
- 3.13 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 reforms<sup>6</sup>.
- 3.14 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.
- 3.15 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*”.
- 3.16 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have 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.

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<sup>6</sup> 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.

- 3.17 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.
- 3.18 Temporary accommodation also presents serious risks to children’s health, wellbeing, and safety. This is particularly so for 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.
- 3.19 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*”.
- 3.20 More recently, in May 2021, Shelter published its report “*Denied the Right to a Safe Home – Exposing the Housing Emergency*” 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).
- 3.21 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 an overcrowded home, you're more likely to get coronavirus. 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)

- 3.22 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).
- 3.23 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).

- 3.24 In April 2022 Shelter published a further report titled “*Unlocking Social Housing: How to fix the rules that are holding back building*”. 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.”*

- 3.25 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.

- 3.26 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).*

- 3.27 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.”*

- 3.28 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.*”

- 3.29 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.”*
- 3.30 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).
- 3.31 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.”*
- 3.32 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.”*
- 3.33 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).

- 3.34 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 (**CD10.28, p.16, [88]**) 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.”*

- 3.35 It is also pertinent to highlight that Tandridge themselves recognise the consequences of failing to meet affordable housing needs. The Council’s Housing Strategy 2019 to 2023, at page 11 goes on to outline the impact of the shortage of affordable housing and the results for households that rely on the private rented sector; it notes that for many such households

*‘... the main way to make privately rented housing affordable is to take a property that is too small for the household. This often means that families on low incomes and benefits live in overcrowded conditions for extended periods of time, even years...’*

### **The Cost of Living Crisis**

- 3.36 On 8 March 2024, the House of Commons published its ‘Rising Cost of living in the UK’ briefing report<sup>7</sup> which highlights the affordability of goods and services for households.
- 3.37 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.”*
- 3.38 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits.

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<sup>7</sup> Source: <https://commonslibrary.parliament.uk/research-briefings/cbp-9428/>

- 3.39 Shelter published a briefing report in September 2022 titled ‘Briefing: Cost of Living Crisis and the Housing Emergency’ 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).*

- 3.40 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**

- 3.41 In my opinion the cost of temporary accommodation is an important material consideration in the determination of this appeal.
- 3.42 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.
- 3.43 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.

### **Summary and Conclusions**

- 3.44 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;
  - 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.

3.45 These harsh consequences fall upon real households and 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.

3.46 I am strongly of the opinion that a step change in the delivery of affordable housing is needed now.

3.47 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

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## 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 2006/07 and 2025/26. Core Strategy shows how housing will be delivered over a 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) (**CD6.1**). 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 base<sup>8</sup> 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.’*

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<sup>8</sup> 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.1F<sup>9</sup>
- 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.

**Early Engagement Document (Regulation 18) (CD7.1)**

- 4.25 Between 19 January 2026 and 1 March 2026 the Council is holding a consultation on an Early Engagement Document (Regulation 18).

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<sup>9</sup> 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.

- 4.26 Section 1.2 of the Consultation Document highlights that the *‘new standard method establishes a housing requirement for Tandridge of 827 homes per year ..’* whilst *‘Completions at present average around 250 homes per year ...’*. It carries on by stating *‘The Council’s new Local Plan must meet the new rules that are predicated on the starting assumption that all areas and plans should meet the standard method in full, or it will not pass the examination process.’*
- 4.27 Section 3.5 (pages 14 and 15) of the Early Engagement Document considers affordable housing, and identifies *‘the delivery of affordable homes is one of the key challenges we face ...’*.
- 4.28 Page 14 highlights in that *‘RPs are increasingly unable to take S106 affordable homes’* and the Council has instead sought commuted sums to support the direct provision of affordable housing by the Council. This is particularly relevant given the finding from the Regulator of Social Housing on 17 September 2025 (**Appendix JS7**) that there were *‘very serious failings’* in affordable housing provided and administer by Tandridge District Council, this is considered further in Section 7 of my evidence.
- 4.29 There is no published draft of an Emerging Local Plan nor have any relevant new evidence base documents been published. The Early Engagement Document (Regulation 18) does not identify any draft allocations or present any draft policies and whilst a positive early step in the preparation of a new Local Plan it is not considered to hold any planning weight at this stage.

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

- 4.30 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.
- 4.31 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.'*

4.32 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%'*

4.33 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.

4.34 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.'*

#### **Draft National Planning Policy Framework for Consultation (December 2025)**

4.35 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. 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.

4.36 The draft December 2025 NPPF places additional emphasis on the delivery of affordable housing, within the context of the wider proposed changes to the planning system which seek to make *'planning policy easier to use, underpin the development of faster and simpler local plans, and be more directive of decision-making in support of both appropriate housing and commercial development ...'*

4.37 HO5 (meeting the needs of different groups) requires development plans to include policies that set requirements for the type and mix of affordable housing *'required to meet identified needs...'*

- 4.38 HO8 (providing affordable homes) establishes that development proposals are expected to *'meet or exceed up-to-date development plan requirements'* for the relevant mix of affordable housing tenures.

### **Corporate Documents**

- 4.39 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 (CD6.26)

- 4.40 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."*
- 4.41 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."*
- 4.42 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) (CD6.27)

4.43 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.”*

4.44 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. Research<sup>10</sup> 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].*

4.45 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...”*

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

- 4.46 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.
- 4.47 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"*.

Tandridge Housing Strategy 2019-2023 (CD6.28)

- 4.48 The forward to the Housing Strategy, provided by Councillor Martin Fisher (leader of the Council), states on page 3 that *'... we need a mix of homes for people of all ages so our young people don't have to leave the district simply because they can't afford to stay.'* It goes on to clarify that *'The Council has a vital role to play in boosting the supply of housing and focusing on making homes in our district more affordable.'*
- 4.49 Page 6 sets out the vision for the Strategy which includes delivering affordable housing, as reflected in Objective 1 ('Building the homes we need') (page 6) of the Strategy.
- 4.50 Page 7 outlines 'Key Facts' for the District includes *'1,555 households on the housing register in July 2018'<sup>11</sup>.* Whilst it does not state how the percentages have been calculated the Key Facts include the staggering figures that *'81% can't afford to buy a property. 57% can't afford to privately rent a 3 bedroom property. 39% can't afford to privately rent a 2 bedroom property.'*
- 4.51 Page 10 provides that *'... rents are very expensive and can be 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. ... This impacts on the money these households have available for other essentials such as food, heating and clothing.'*
- 4.52 Paragraph 1.18 (page 11) provides an overview of the incomes of those on the Housing Register. It concludes *'... the majority of the applicants on the Housing Register do not have sufficient income to be able to rent affordable rented properties. ... thereby placing additional pressure on the Council's Housing Register because **there are insufficient truly affordable housing options in the district** which enable them to meet their housing need for themselves [my emphasis].'*

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<sup>11</sup> The Council's FOI response (**Appendix JS1**) provides that as of 31 March 2025 there are 1,956 households on the Housing Register.

- 4.53 Paragraph 1.26 (page 12) describes meeting the District’s need for affordable housing as ‘*sizeable task.*’ With paragraph 1.27 clarifying that ‘*Without a supply of affordable housing arising from larger sites the Council will find it more difficult to meet its housing obligations, notwithstanding our own programme.*’
- 4.54 Pages 24 to 32 stress the need for affordable housing in the District and reference the 2015 SHMA and the evidence prepared in relation to the now withdrawn ‘Our Local Plan 2033’. This includes support for the provision of affordable housing as part of market housing led developments along with residential development by Registered Providers and through the then to be established house building company of the Council.
- 4.55 Paragraph 9.5 of the Council’s Housing Revenue Account 2026/27 Proposed Budget (**Appendix JS8**), presented at the Housing Committee meeting of 22 January 2026 states:
- ‘The Council House Building programme reflects the Council’s **ambitions to complete 40 homes per year** and allows the programme to catch up with years where this has not been achieved due to Covid followed by high inflation and pressure on the construction industry [my emphasis].’*
- 4.56 Notably this is unchanged from the Council’s ambitions to build 40 homes per year outlined in 2025/26 budget.
- 4.57 The priorities associated with Strategic Objective 1 (‘Building the homes we need’) are summarised on page 37 and strongly emphasis the need for additional affordable housing in the District and the Council’s commitment to increasing the delivery of affordable housing.
- 4.58 Whilst the Council House building programme is welcomed it in itself will not resolve the on-going and pressing need for more affordable housing in Tandridge. Furthermore, any completions from this source would be recorded as part of the overall affordable housing completions, which are recorded each year in the AMR (**CD6.3, CD6.3, CD6.5, and CD6.53**).

### **Summary and Conclusions**

- 4.59 The relevant Development Plan in respect of affordable housing for Tandridge District Council currently comprises the Core Strategy and LPP2.

- 4.60 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.
- 4.61 The appeal proposals provide an affordable housing contribution which exceeds requirements of Core Strategy Policy CSP4.
- 4.62 The provision of affordable homes<sup>12</sup> at the appeal 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.

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<sup>12</sup> This includes, among other things, the provision of up to 166 C3 dwellings and up to 41 C2 extra care units of which 50% are proposed as affordable; the extra care units considered in the evidence of Mr Iain Warner (**CD11.17**).

# Affordable Housing Needs

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## 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 19-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 (CD6.29)

- 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 2006/07 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 2006/07 and 2012/13.**

Affordable Housing Needs Assessment 2015 (CD6.30)

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 (CD6.31)

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 its five-year housing land supply is contained in the Authority Monitoring Report ('AMR') 2024/25 (December 2025) (**CD6.53**). It sets out that the Council's overall housing need for the period 2025/26 to 2029/30 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.'*<sup>13</sup>

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.

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<sup>13</sup> 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 2006/07 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

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## 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 2006/07.

*\*\* continued overleaf \*\**

Figure 6.1: Gross Additions to Affordable Housing Stock, 2006/07 to 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2006/07	459	256	56%
2007/08	285	64	22%
2008/09	297	49	16%
2009/10	172	8	5%
2010/11	132	61	46%
2011/12	261	62	24%
2012/13	221	47	21%
2013/14	256	57	22%
2014/15	142	56	39%
2015/16	322	12	4%
2016/17	228	85	37%
2017/18	332	91	27%
2018/19	244	55	23%
2019/20	262	127	48%
2020/21	117	9	8%
2021/22	238	51	21%
2022/23	303	60	20%
2023/24	238	77	32%
2024/25	183	33	18%
<b>Totals</b>	<b>4,692</b>	<b>1,260</b>	<b>27%</b>
<b>Avg. Pa.</b>	<b>247</b>	<b>66</b>	

Source: Tandridge District Council Authority Monitoring Report 2024/25 CD6.53.

- 6.3 Between 2006/07 and 2024/25, a total of 4,692 dwellings were delivered in Tandridge, equivalent to 247 per annum. Of these, 1,260 dwellings were affordable tenures, equivalent to 66 per annum. This equates to 27% 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 2006/07, net of Right to Buy sales. A net loss of 149<sup>14</sup> affordable dwellings over this period equates to 12% of the gross affordable housing completions of 1,260 affordable dwellings over the 19-year period.

*\*\* continued overleaf \*\**

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<sup>14</sup> (156 + 5) – 12 = 149 dwellings.

Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2006/07 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
2006/07	459	256		19		237	52%
2007/08	285	64		12		52	18%
2008/09	297	49		4		45	15%
2009/10	172	8		1		7	4%
2010/11	132	61		2		59	45%
2011/12	261	62		4	0	58	22%
2012/13	221	47		11	0	36	16%
2013/14	256	57		15	0	42	16%
2014/15	142	56		7	3	46	32%
2015/16	322	12		21	1	-10	-3%
2016/17	228	85		10	0	75	33%
2017/18	332	91	0	8	0	83	25%
2018/19	244	55	0	11	0	44	18%
2019/20	262	127	0	6	1	120	46%
2020/21	117	9	1	11	0	-1	-1%
2021/22	238	51	7	8	0	50	21%
2022/23	303	60	2	2	0	60	20%
2023/24	238	77	1	4	0	74	31%
2024/25	183	33	1	-	0	34	19%
<b>Total</b>	<b>4,692</b>	<b>1,260</b>	<b>12</b>	<b>156</b>	<b>5</b>	<b>1,111</b>	<b>24%</b>
<b>Avg. Pa.</b>	<b>247</b>	<b>66</b>	<b>2</b>	<b>9</b>	<b>0</b>	<b>58</b>	

Source: Figure 6.1 and MHCLG Open Data

- 6.7 Figure 6.2 demonstrates that on average between 2006/07 and 2024/25, the Council has added just 58 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 24% 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 Footnote 2 of the 2021/22 Authority Monitoring Report (**CD6.3**) states *‘The high number of affordable completions in 2006-2007 is largely due to 208 key worker affordable completions at ‘Well Farm Heights’ in Whyteleafe.’*
- 6.9 It should be emphasised that in the period between 2006/07 and 2011/12, accounting for the Right to Buy and the 208 key worker dwellings, on average 42 affordable homes were completed per annum;<sup>15</sup> the gross completion figure for the same period was 49<sup>16</sup> 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.
- 6.10 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.
- 6.11 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.
- 6.12 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 (**CD10.29**). 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]”.*

<sup>15</sup> (458-208) / 6 = 41.6 (rounded to 42).

<sup>16</sup> (500 – 208) / 6 = 48.6 (rounded to 49).

- 6.13 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.
- 6.14 The seriousness of the impact was considered in a report from the New Economics Foundation in May 2024 which is attached at **Appendix JS4**.
- 6.15 The report highlights that the Right to Buy Scheme has depleted the existing affordable housing stock, explaining that *'Right to Buy has resulted in a net loss of social rent homes every year since its introduction'*. Despite government commitments, *"the one-for-one replacement pledge has never been met"*; the report notes that *'for every three homes sold, only one replacement has been started or acquired.'* Clearly, the data shows that homes lost through Right to Buy are not being replaced anywhere near the pace that is needed to counterbalance those sales.
- 6.16 Furthermore, the report shows that around 4-in-10 homes sold under Right to Buy have not remained in owner occupation, but have instead moved into the private rented sector, often at far higher rents than they would have been in the social rented sector. It cites evidence that *'40.8% of homes sold under right to buy are now let on the private market, compared to 37.66% in 2014/15, a 3.2 percentage point increase [...] 2m homes we know have been sold to 2022/23 would mean approximately 824,000 of these sold homes are now privately let, a rise of 109,000 homes since 2014/15 [...] this means that between 2014/15 and 202/23, an additional approximate 119,000 homes were sold under right to buy [...] In short, right to buy is increasingly failing to deliver on its stated guiding principle: to increase home ownership.'*
- 6.17 The report then notes the financial implications of the transfer of these homes into the private rented sector, stating that: *'All this places additional financial burdens on taxpayers because of the higher housing benefit costs arising from the transfer of what been a socially rented property into being privately let. Because PRS rents are far higher than social rents, the private letting of former council homes costs taxpayers an additional £50m per year in housing benefit.'*
- 6.18 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.
- 6.19 The comments of the New Economics Foundation 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 Nutfield Civil Parish**

- 6.20 The Council's FoI response of 5 August 2025 (**Appendix JS1**) states that completions data is only available from the 2013/14 monitoring year onwards. The Council's response provided affordable housing completions data for the '*Nutfield local area*'<sup>17</sup> but no data on market housing completions.
- 6.21 It stated that between 2013 and 2017 there were no affordable housing completions, 10 in 2018/19, none between 2019 and 2023, and just one in 2024/25. In total just 11 affordable homes were completed in Nutfield over the thirteen-year period between 2013/14 and 2024/25. Moreover, Right to Buy data is not available at parish level and consequently the delivery of 11 affordable homes in Nutfield is the gross figure and would likely be lower if the Right to Buy were accounted for.
- 6.22 Affordable housing delivery in Nutfield over the past thirteen years should be viewed in context of the fact that the Council's FOI response (**Appendix JS1**) shows that as of 31 March 2025 there were 115 households on the Housing Register that expressed a desire for an affordable home in Nutfield, this equates to 6% of the 1,956 households registered on 31 March 2025.
- 6.23 The completion of just 11 affordable homes in Nutfield since 2013/14 represents just 2% of the 713 gross affordable homes completed across the District since 2013/14; this means that the proportion of the Housing Register with an expressed desire to live in Nutfield (6% of the Housing Register) is on face value about three times greater than the proportion of affordable dwellings completions in the District located within Nutfield (2%). This demonstrates to me, there is likely to be a local pent-up need for affordable housing.

### **Affordable Housing Delivery Compared to Affordable Housing Needs**

- 6.24 Figure 6.3 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.

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<sup>17</sup> The Council's FoI response of 5 August 2025 did not identify the boundaries of the '*Nutfield local area*' for which data was provided.

Figure 6.3: 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	83	456	-373	-1,220	18%
2018/19	44	456	-412	-1,632	10%
2019/20	120	456	-336	-1,968	26%
<b>Total</b>	<b>312</b>	<b>2,280</b>	<b>-1,968</b>		<b>14%</b>
<b>Avg. Pa</b>	<b>62</b>	<b>456</b>	<b>-394</b>		

Source: Figure 6.2 and 2015 AHNA

\*Figures subject to rounding.

- 6.25 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 -1,968 affordable dwellings arose over the five-year period, equivalent to an average annual shortfall of -394 affordable dwellings.
- 6.26 Figure 6.4 (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 6.4: 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	44	391	-347	-347	11%
2019/20	120	391	-271	-618	31%
2020/21	-1	391	-392	-1,010	0%
2021/22	50	391	-341	-1,351	13%
2022/23	60	391	-331	-1,682	15%
2023/24	74	310	-236	-1,918	24%
2024/25	34	310	-276	-2,194	11%
<b>Total</b>	<b>381</b>	<b>2,575</b>	<b>-2,194</b>		<b>15%</b>
<b>Avg. Pa</b>	<b>54</b>	<b>368</b>	<b>-313</b>		

Source: Figure 6.2 and 2018 AHNA

\*Figures may not sum due to rounding.

- 6.27 Since the start of the 2018 AHNA period in 2018/19 affordable housing completions (net of Right to Buy) have averaged just 54 net affordable dwellings per annum, against an average net need for 368<sup>18</sup> affordable homes per annum over the same period. A shortfall of -2,194 affordable dwellings has arisen over the seven-year period, equivalent to an average annual shortfall of -313 affordable dwellings.
- 6.28 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 6.3 and 6.4 would likely be greater still were they to include the full range of affordable housing need recognised by the NPPF.
- 6.29 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.

<sup>18</sup>  $((391*5) + (310*2))/7 = 368$ .

## Summary and Conclusions

- 6.30 The above evidence demonstrates that across Tandridge, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 6.31 In the 19-year period since the start of the Core Strategy period in 2006/07, net of Right to Buy affordable housing delivery represented just 24% of overall housing delivery, equating to just 58 affordable dwellings per annum.
- 6.32 Only with the inclusion of the 208 key worker dwellings completed in 2006/07 do gross affordable housing completions for the period come above the 50 affordable homes per annum set as a target between 2006/07 and 2012/13 by the Core Strategy. By any measure the Core Strategy has failed to deliver on its objectives or those of the Community Strategy.
- 6.33 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.
- 6.34 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 381 affordable homes, net of the Right to Buy, were delivered; this equates to a shortfall of -2,194 affordable homes over the period, or an average annual shortfall of -313 affordable homes.
- 6.35 The concerns raised about the up-to-date nature 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.
- 6.36 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. Clearly, a position substantiated by the findings of the Darlington SHMA, included as **Appendix JS3**.
- 6.37 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.

6.38 In light of the identified level of need there can be no doubt that the delivery of affordable dwellings on the proposed site will make an extremely important contribution to the affordable housing needs of Tandridge.

# Affordability Indicators

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## Section 7

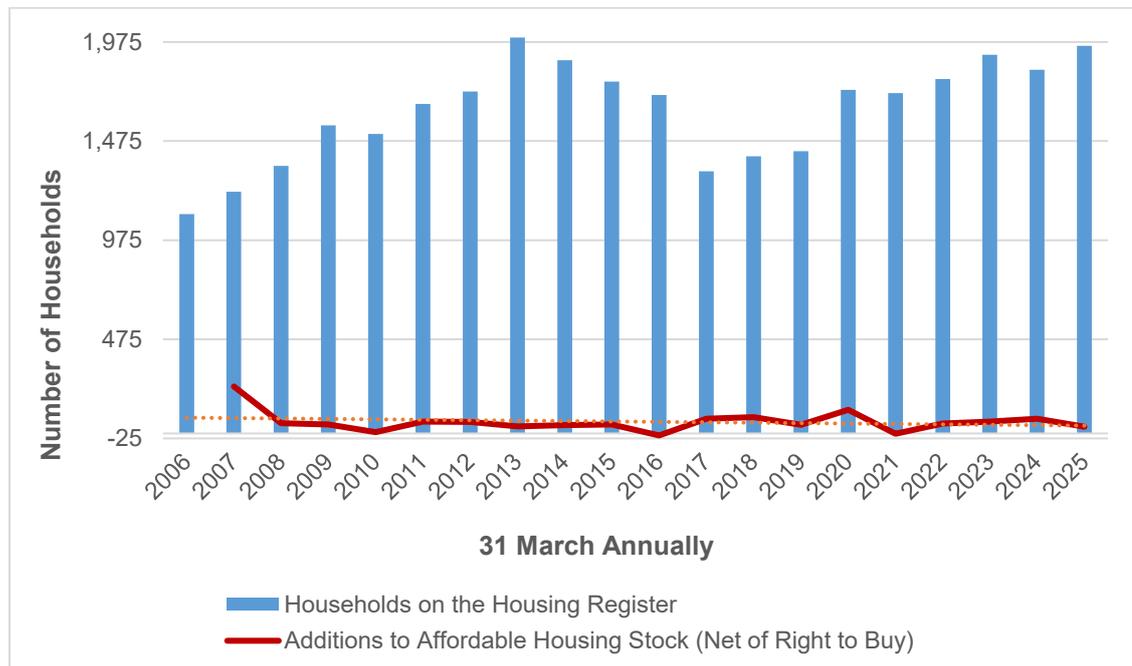
### Introduction

- 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.

### Housing Register

- 7.2 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.
- 7.3 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, 115 registered households indicated they would consider an affordable home in Nutfield; this represents 6% of the 1,956 households on the Housing Register on 31 March 2025, as shown by the Council's FOI response (**Appendix JS1**).
- 7.4 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 2006.

Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2006 to 2025



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

7.5 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 2006.

7.6 Footnote 4 of MHCLG<sup>19</sup> 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 housing registers, as it allowed local authorities to set their own qualification criteria.”*

7.7 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.

<sup>19</sup> Ministry of Housing, Communities and Local Government

7.8 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.

7.9 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.”*

7.10 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 77%, from 1,107 households in 2006 to 1,956 households in 2025.

7.11 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.

7.12 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 (**CD10.30**) 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).*

- 7.13 Furthermore, in the appeal at Oxford Brookes University Campus at Wheatley, (CD10.31) 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).*

- 7.14 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”.*

- 7.15 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”.*

- 7.16 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 Tandridge’s housing register remains high.

- 7.17 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.

- 7.18 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.
- 7.19 The Franklands Drive Secretary of State appeal decision in 2006 (**CD10.32**) 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.
- 7.20 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**

- 7.21 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.
- 7.22 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) <sup>20</sup>
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)

- 7.23 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

- 7.24 The Council's FOI response (**Appendix JS1**) confirms that as of 20 November 2025, there were 115 households who specified a preference for an affordable home in Nutfield. This represents 6% of the total Housing Register (1,956 households).
- 7.25 Figure 7.3 below demonstrates average number of bids per property in Nutfield over the 2024/25 monitoring period for a range of types of affordable property.

Figure 7.3: Bids Per Property in Nutfield,<sup>21</sup> April 2024 to March 2025

Type of Affordable Property	No. Properties Advertised	Average Bids Per Property
1-bed affordable dwelling	1	130
2-bed affordable dwelling	1	203
3-bed affordable dwelling	1	137
4+ bed affordable dwelling	0	N/A

Source: Freedom of Information response (5 August 2025)

- 7.26 Figure 7.3 demonstrates that between 1 April 2024 to 31 March 2025 there were an average of 130 bids per 1-bed affordable dwelling put up for let in Nutfield, 203 average bids per 2-bed affordable dwelling and 137 average bids per 3-bed affordable dwelling, and no 4+ bed affordable dwellings were advertised.

<sup>20</sup> 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.

<sup>21</sup> The Council's Freedom of Information response provides data in relation to 'Nutfield' but does not specify whether the data provided relates to the parish or ward area.

- 7.27 In my opinion, the extremely high ratio of bids to properties advertised is a clear indication of inadequate level of affordable housing delivery and demonstrates that a very substantial increase is required to address the scale of unmet need.
- 7.28 For every successful letting, there are clearly 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 Nutfield that is not being met.

### **Temporary Accommodation**

- 7.29 The Council's FOI response (**Appendix JS1**) provides that that on 31 March 2025, there were 53 households housed in temporary accommodation by the Council. Of whom 7 households were housed outside the District up from a single household on 31 March 2024.
- 7.30 MHCLG statutory homelessness data highlights that 58% of these households housed in local authority stock. This represents a 13% increase from the 47 households in temporary accommodation on 31 March 2024, as reported by MHCLG data.
- 7.31 Notably, of the 53 households in temporary accommodation as of 31 March 2025, 39 had been in housed in temporary accommodation for more than six months, 25 (47%) for more than a year, and 13 (25%) for between two and five years.
- 7.32 Of these, 42 (79%) were households with children. The Council has a responsibility to house these households. It is notable that 27 (64%) of the 42 households with children had been in temporary accommodation for more than six months, 23 (55%) for at least a year, and 12 (64%) for between two and five years.
- 7.33 The regulatory judgement of the Regulator of Social Housing, published 17 September 2025 (**Appendix JS7**), should be highlighted given the degree to which the Council relies on its own housing stock to accommodate those requiring temporary accommodation, often the most vulnerable households. The Regulator of Social Housing describes its role as '*We regulate for a viable, efficient, and well governed social housing sector able to deliver quality homes and services for current and future tenants.*'
- 7.34 The Regulator of Social Housing assessed the performance of Tandridge District Council in relation to those households to whom it acts as landlord – i.e. those in housing stock owned by the Council. The judgement was accompanied by a grading of C4, which 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...*’

- 7.35 It should be emphasised that grades are only provided ‘*for landlords with more than 1,000 social housing homes.*’ Consequently, the C4 grade received by Tandridge District Council is relevant not only to those households in temporary accommodation managed by the Council as MHCLG data shows that as of 31 March 2025 there were 2,462 dwellings owned by the Council and provided as affordable housing for Social Rent in the District, with a further 135 for Affordable Rent.
- 7.36 MHCLG data indicates that Tandridge spent £1,733,000 on temporary accommodation between 1 April 2023 and 31 March 2024. No figure is available for the amount spent on temporary accommodation in Tandridge between 1 April 2024 and 31 March 2025.
- 7.37 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.
- 7.38 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.’*
- 7.39 The “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” report (CD6.33) 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.
- 7.40 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

- 7.41 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 197 households in need of homelessness prevention duty<sup>22</sup>, and a further 89 households in need of relief duty<sup>23</sup> from the Council.
- 7.42 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%).
- 7.43 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."*

## Private Rental Market

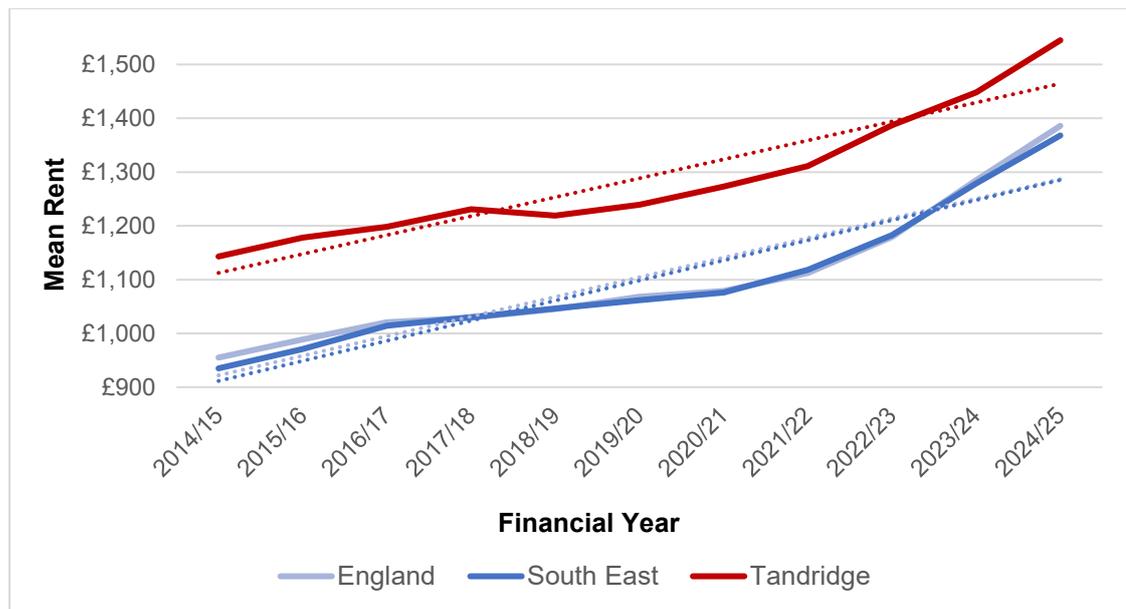
- 7.44 Office for National Statistics ("ONS") data (first produced in 2014/15) shows that average (mean) private rents in Tandridge stood at £1,545 per calendar month ("pcm") in 2024/25. This represents a 35% increase from 2014/15 where average private rents stood at £1,143 pcm.

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<sup>22</sup> 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 homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

<sup>23</sup> 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.

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



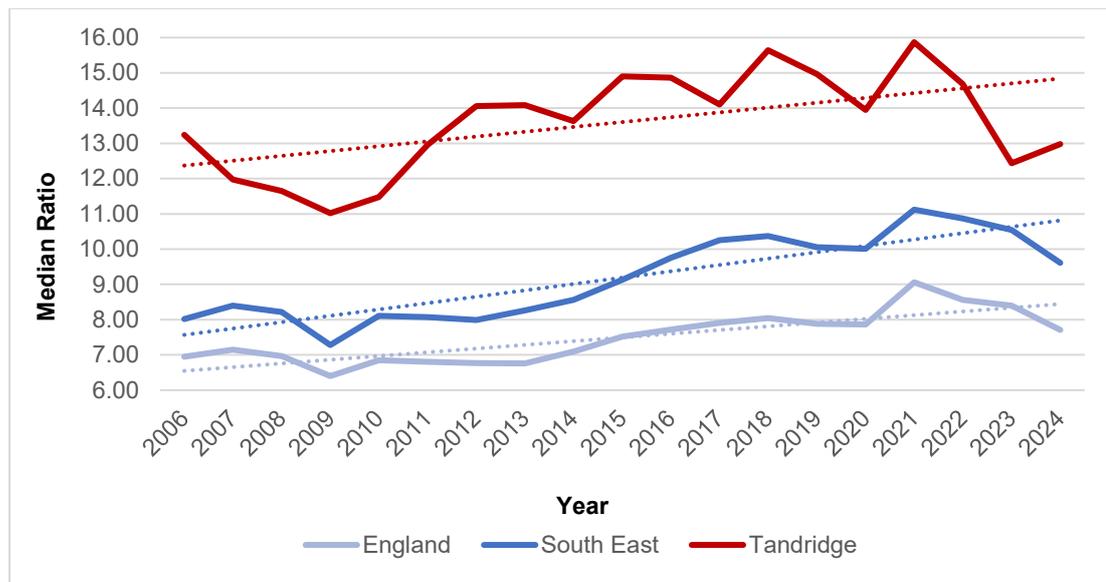
Source: ONS.

- 7.45 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.
- 7.46 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

- 7.47 The ratio of median house prices to median incomes in Tandridge now stands at **12.98**. 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, 2006 to 2024

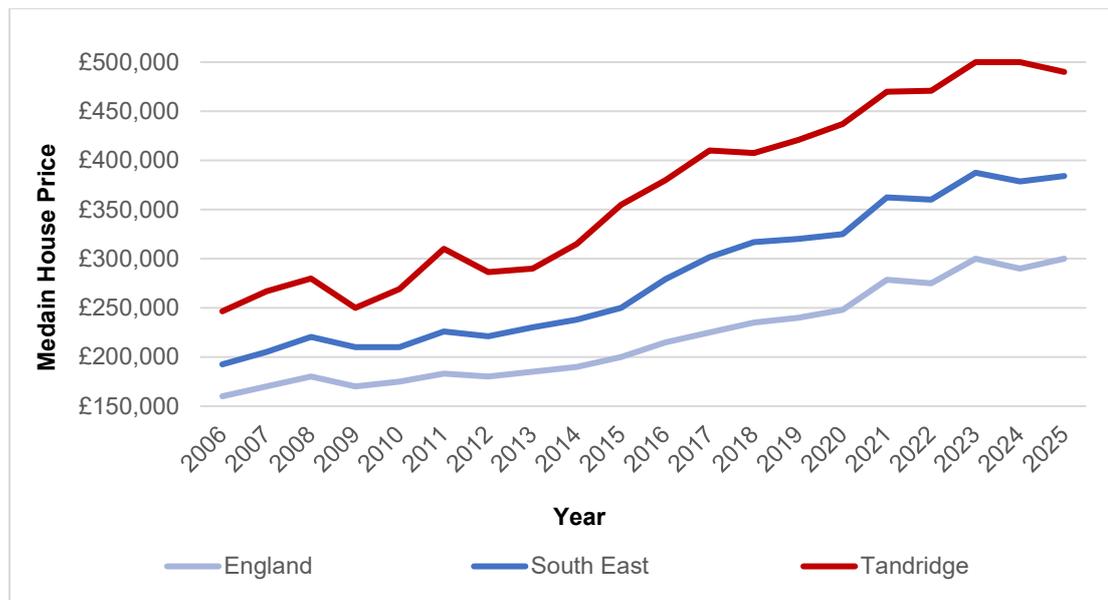


Source: ONS.

- 7.48 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.
- 7.49 Notably the median house price to income ratio in Tandridge increased (+4%) in the most recent monitoring year<sup>24</sup> in stark contrast to the declines observed in England (-8%) and the South East (-9%).
- 7.50 Between 2023 and 2024, out of the 318 local planning authorities the increase in the median house price to income ratio in Tandridge was the eleventh highest; meaning the increase in Tandridge was greater than 307 other local planning authorities, only ten authorities saw a greater increase (worsening) of the ratio.
- 7.51 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 2006 and 2025.

<sup>24</sup> The 2023 to 2024 monitoring year is the most recent for which data is available.

Figure 7.6: Median House Price Comparison, 2006 to 2025



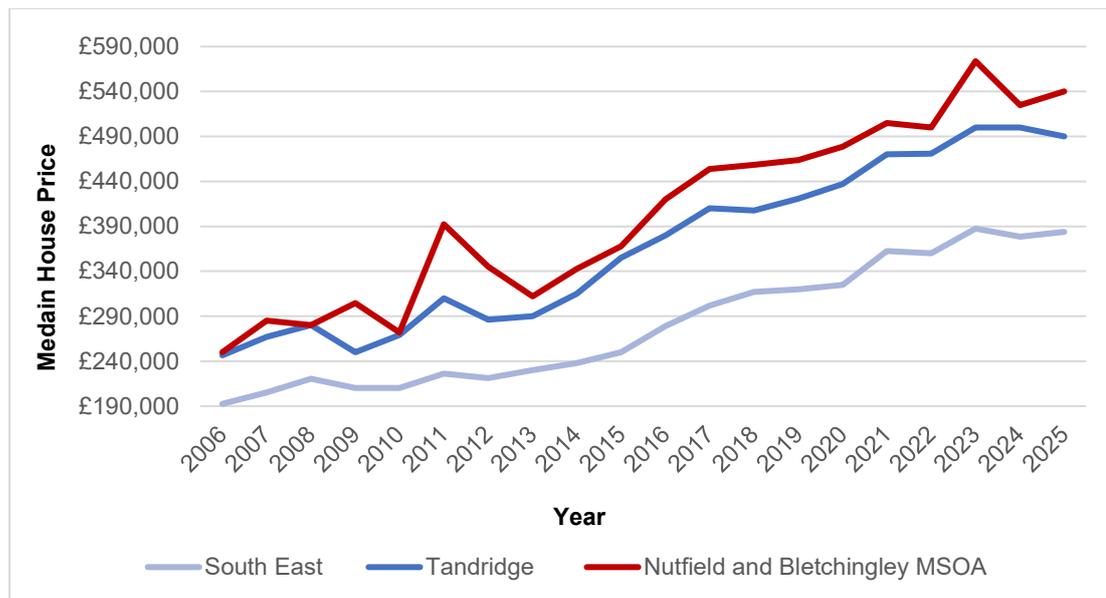
Source: ONS.

- 7.52 The median house price across Tandridge has risen by 99% from £246,500 in 2006 to £490,000 in 2025. This figure is strikingly above (63% higher) the national figure of £300,000, which has seen an increase of 88% over the same period and 28% higher than the South East figure of £384,000 which has seen an increase of 99% over the same period.
- 7.53 Figure 7.7 below compares the median house sale prices in the Nutfield and Bletchingley MSOA<sup>25</sup> (Tandridge 008) with Tandridge and the South East. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2006 and 2025.

\*\* continued overleaf \*\*

<sup>25</sup> 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, 2006 to 2025



Source: ONS.

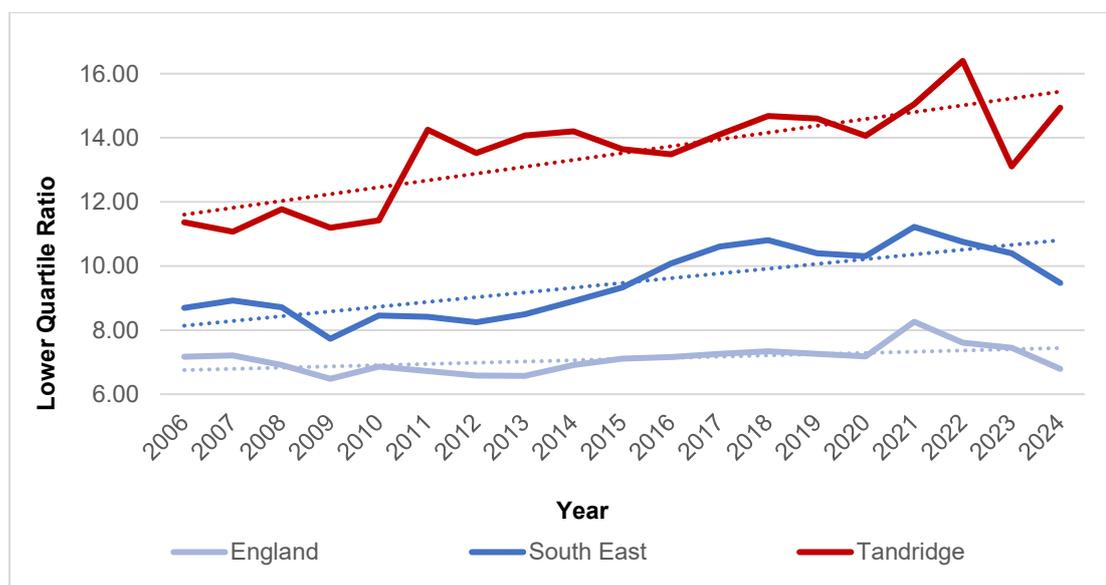
- 7.54 The median house price across the Nutfield and Bletchingley MSOA has risen by 116% from £250,000 in 2006 to £540,000 in 2025. This represents a significantly greater rate of increase over the period than observed in Tandridge (+99%) and the South East (+99%).
- 7.55 Moreover, in 2006 the median house price in the Nutfield and Bletchingley MSOA (£250,000) was aligned with that of Tandridge (£246,500); strikingly in 2025 the median house price in the Nutfield and Bletchingley MSOA (£540,000) is 10% higher than the figure for Tandridge as a whole (£490,000).
- 7.56 Again, the gap between the median house price in the MSOA and those of the South East has increased substantially since the start of the Core Strategy period. In 2006 the median house price in the Nutfield and Bletchingley MSOA was 30% higher than in the South East (£192,500); in 2025 the median house price in MSOA is 41% higher than that in the South East.

### Lower Quartile House Prices

- 7.57 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 32% increase since the start of the Core Strategy period in 2006 when it stood at 11.36.

- 7.58 Pertinently, the start of the Core Strategy period, in 2006, 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 relatively flat since 2006 (-5% over the 19 year period), with the exception of a spike in 2021 and 2022 potentially linked to Covid 19 related changes in the housing market, whereas in Tandridge it increased 32%. **The increase in the ratio in Tandridge is triple the increase observed in the South East region as whole (+9%) over the same period.**
- 7.59 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.
- 7.60 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, 2006 to 2024*

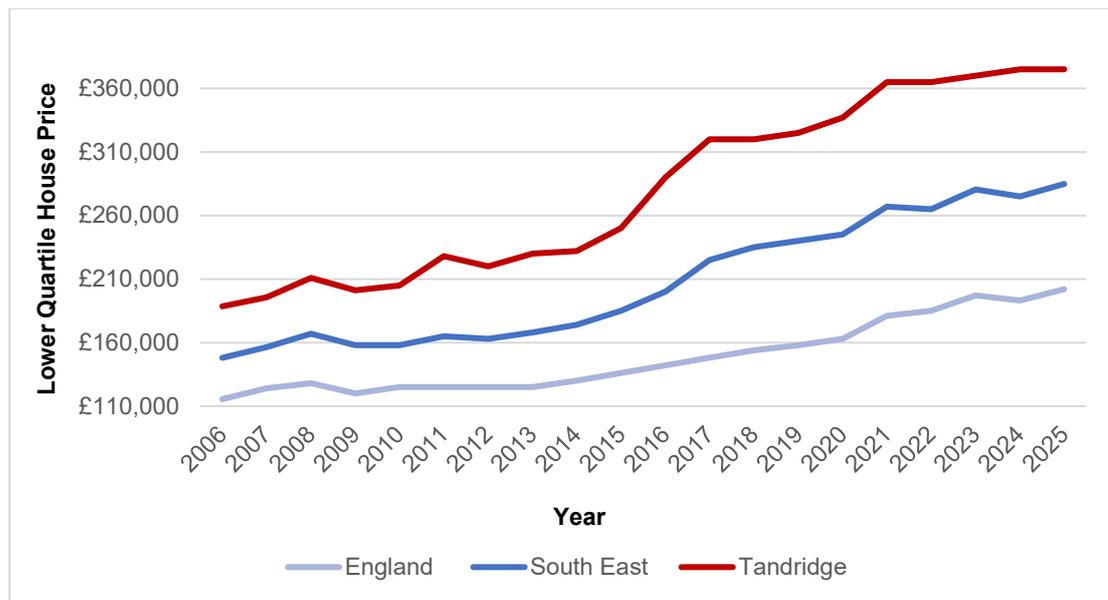


Source: ONS.

- 7.61 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.

- 7.62 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.
- 7.63 Figure 7.8, 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.’*
- 7.64 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 (11.36) 31% higher than that of the South East (8.69) and 58% higher than that for England (7.17). 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).
- 7.65 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.**
- 7.66 This fact alone demonstrates the acute nature of the affordable housing crisis in Tandridge.
- 7.67 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 2006 and 2025.

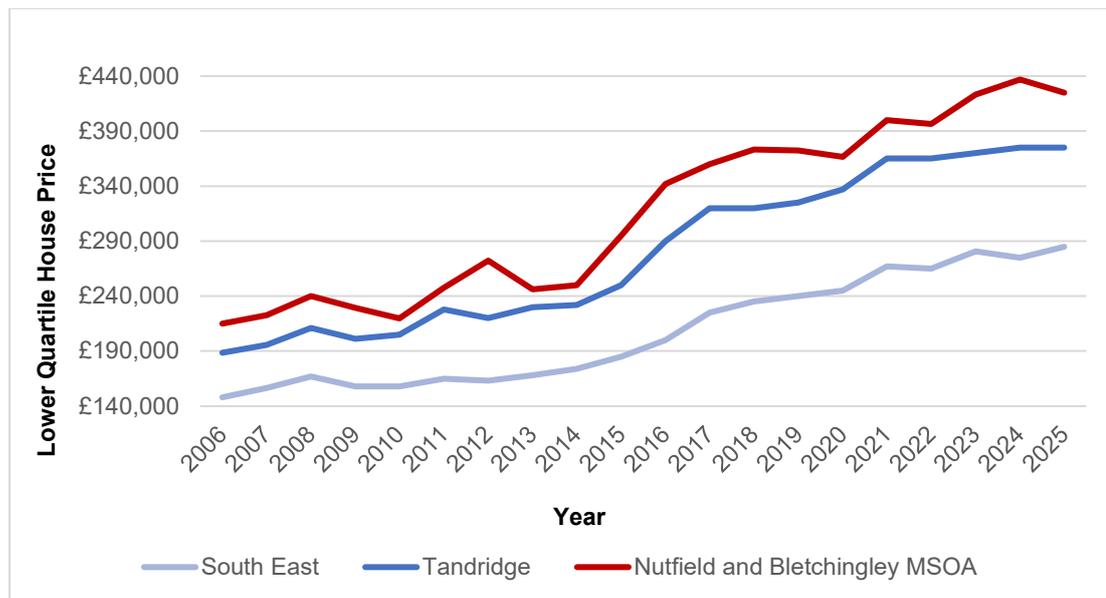
Figure 7.9: Lower Quartile House Prices, 2006 to 2025



Source: ONS.

- 7.68 The lower quartile house price across Tandridge has risen by 99% from £188,500 in 2006 to £375,000 in 2025. This compares to a 92% increase across the South East and a national increase of 75% over the same period.
- 7.69 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).
- 7.70 Figure 7.10 below compares the lower quartile house sale prices in the Tandridge 008 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 2006 and 2025.

Figure 7.10: Lower Quartile House Price Comparison, 2006 to 2025



Source: ONS.

- 7.71 The lower quartile house price across Nutfield and Bletchingley MSOA (Tandridge 008) has risen by 98% from £215,000 in 2006 to £425,000 in 2025. This figure is 13% higher than the Tandridge figure of £375,000, (which has seen an increase of 99% over the period) and 49% higher than the South East figure of £284,838 (which has seen an increase of 92% over the period).
- 7.72 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 (CD10.33, 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

- 7.73 As demonstrated through the analysis in this section, affordability across Tandridge has been, and continues to be, in an acute crisis.
- 7.74 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.
- 7.75 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**.
- 7.76 Market signals indicate a worsening trend in affordability in Tandridge and within the Nutfield and Bletchingley 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

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## 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 381 affordable homes (net of Right to Buy) against a need of 2,575 net new affordable homes, which has resulted in a shortfall of -2,194 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 PPG<sup>26</sup> and endorsed at appeal.

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<sup>26</sup> 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 (**CD10.28, 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 -2,194 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 142% to 749 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

<b>A</b>	Affordable housing need per annum for the period 2018/19 to 2024/25 identified in the 2018 ANHA	<b>368<sup>27</sup></b>
<b>B</b>	Net Affordable housing need for the period 2018/19 to 2024/25 (A x 7)	<b>2,575</b>
<b>C</b>	Net of Right to Buy sales Affordable housing completions for the period 2018/19 to 2024/25	<b>381</b>
<b>D</b>	Shortfall/backlog of affordable housing need for the period 2018/19 to 2024/25 (B – C)	<b>2,194</b>
<b>E</b>	Backlog affordable housing need per annum required over the period 2025/26 to 2029/30 (D/5)	<b>439<sup>28</sup></b>
<b>F</b>	Full affordable housing need per annum for the period 2025/26 to 2029/30 (310 + E)	<b>749<sup>29</sup></b>
<b>G</b>	Full affordable housing need for the period 2025/26 to 2029/30 (F x 5)	<b>3,744</b>

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 749 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 2024/25 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	749
2026/27	310	749
2027/28	310	749
2028/29	310	749
2029/30	310	749
<b>Total</b>	<b>1,550</b>	<b>3,744</b>

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.

<sup>27</sup>  $((391*5)+(310*2))/7=367.9$  (rounded to 368).

<sup>28</sup>  $2,194/5 = 438.8$  (rounded to 439).

<sup>29</sup>  $310+438.8 = 748.8$  (rounded to 749).

## 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 (**CD12.1**) for this appeal, covering the period 1 October 2025 to 31 September 2030.
- 8.15 If we were to generously to assume that all 2,158 dwellings included in the Council's 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 734<sup>30</sup> affordable dwellings over the period, equating to just 147<sup>31</sup> new affordable dwellings per annum.
- 8.16 This figure falls chronically short of the 748 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 AHNA.
- 8.17 More realistically, if one were to assume that the past gross affordable housing provision of 27% is to be continued over the next five years, this is likely to deliver only 583<sup>32</sup> affordable dwellings over the period, equating to just 117<sup>33</sup> 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 2006/07 up to 2024/25. Average delivery on a per annum basis over the same period has been just 58 affordable homes net of Right to Buy, equating to 24% of total completions over the period.
- 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.

<sup>30</sup>  $2,158 * 0.34 = 733.72$  (rounded to 734).

<sup>31</sup>  $733.72 / 5 = 146.74$  (rounded to 147).

<sup>32</sup>  $2,158 * 0.27 = 582.66$  (rounded to 583).

<sup>33</sup>  $582.66 / 5 = 116.53$  (rounded to 117).

## Summary and Conclusions

- 8.20 It is imperative that the -2,194 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 AHNA 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 142% to 749 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 147 new affordable dwellings per annum. If we were to assume that the past gross affordable housing provision of 27% is to be continued over the next five years, this is likely to deliver only 583 affordable dwellings over the period, equating to a much lower affordable housing future supply of just 117 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 50% of the appeal scheme, up to 166 C3 dwellings and up to 41 C2 extra care units, as 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 Assessment of the Application

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## 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.

### Officer Report

- 9.2 The application was refused on 3 October 2025 (**CD3.2**) under delegated powers. The Planning Officer's Report (the 'OR') can be seen under **CD3.1** which recommended the application for refusal.
- 9.3 However, Paragraph 4.1 of the OR states that affordable housing was considered by the Council to be one of the key issues in determining the application. Furthermore, I note the comments from the Council's Housing Development Support Officer, dated 24 June 2025, are not referred to in paragraph 10 (Consultation Responses) or its sub-paragraphs (pages 4 to 9).
- 9.4 The comments noted that '*This increase in affordable housing provision aligns with the golden rules, satisfies policy CSP4, and will be a welcome contribution to our district.*' (my emphasis).
- 9.5 However, the representations made by the Raven Housing Trust are acknowledged in paragraph 11.1, which alongside those of the Council's Housing Development Support Officer are considered further below.
- 9.6 Paragraphs 12.47 (page 20) and 17.9-17.10 (page 37) recognise the appeal scheme's affordable housing provision exceeds the requirements of Policy CSP4 and the 'Golden Rules' set out in paragraph 156 of the NPPF.
- 9.7 Paragraph 13.8 ascribes a combined '*significant weight to market and affordable housing in the overall planning balance.*' This level of weight is not agreed by the Appellant.

- 9.8 The OR highlights, in paragraph 13.5 (page 22) the *'progress in housing delivery since the IPSHD was adopted.'* The Interim Policy Statement for Housing Delivery (the 'IPSHD'), which 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.
- 9.9 However, since the publication of the IPSHD in September 2022 affordable housing delivery remains very substantially below the level of need identified by the 2018 AHNA. As shown in Figure 6.4 of my evidence, between 2022/23 and 2024/25 (i.e. after the IPSHD was adopted), Net of the Right to Buy, 168 affordable dwellings were completed whilst the 2018 AHNA identified a need for 1,011 affordable dwellings over the same period.
- 9.10 The gulf between the two is even more striking in the context of the 2018 AHNA identifying a reduced level of affordable housing need from 2023/24 on the basis that the existing backlog of affordable housing need would be addressed between 2018/19 and 2023/24 – instead it has only increased.
- 9.11 Furthermore, for the reasons detailed in Section 5 of my evidence, the 2018 AHNA is likely to represent an underestimate of the current level of affordable housing need in the District, notably as it does not reflect the full range of affordable housing needs recognised by the NPPF since 2018.
- 9.12 As previously noted, the OR identifies affordable housing as one of the *'key issues'* and paragraph 29.2 (page 65) goes on to state there is an *'an acute affordable housing need across the district.'*
- 9.13 The Tandridge Homelessness Prevention Strategy 2019 – 2023 (extended to 2025) (**CD6.27**) and the Tandridge Housing Strategy 2019 – 2023 (**CD6.28**) identify the Raven Housing Trust as working in partnership with the Council in relation to the provision of temporary accommodation in the District; the Raven Housing Trust is one of the providers of affordable housing available through Tandridge HomeChoice which administers the Housing Register in the District.
- 9.14 The Raven Housing Trust submitted a representation on 22 December 2025 in relation to the appeal scheme. It stated the *'need for affordable homes in the area is acute. There is high demand for affordable homes, with notable interest from local young people eager to access shared ownership and take their first step onto the property ladder.'*

- 9.15 It is my opinion that whilst the OR acknowledges the *'acute affordable housing need'* in the District and the role of the IPSHD in meeting that need it is unclear how the Council assesses the scale of unmet affordable housing need without quantifying it.
- 9.16 As my evidence shows, despite there being no up-to-date NPPF compliant assessment of affordable housing need in the District the number of affordable dwellings completed falls very substantially short of the level of need identified by the 2018 AHNA. Moreover, in the absence of a figure for unmet affordable housing need it is unclear how the OR has fully assessed the benefits associated with the appeal schemes proposed affordable housing provision.

### **Tandridge District Council Statement of Case**

- 9.17 The Council submitted their Statement of Case ("SoC") in respect of the appeal proposals to the Inspectorate in January 2025 which can be viewed under **CD12.1**.
- 9.18 Paragraphs 8.7 and 8.8 (page 13) of the Council's SoC consider affordable housing but do not comment on the quantum of affordable housing need – only that it is *'demonstrable'* and that *'housing provision, and in particular affordable housing, attracts significant weight...'*
- 9.19 Paragraph 8.7 (page 13) states that the Council is *'pro-actively seeking to build affordable homes on its land and land the Council can acquire on the right terms and updated information will be referred to.'*
- 9.20 However, it is unclear to what extent the Council is seeking to meet the *'demonstrable'* and *'acute'* need for affordable housing, as the Council's SoC in my opinion seeks to downplay the level of need that should be met.
- 9.21 I note that the Council's SoC does this in two ways. The first being to highlight, in paragraph 8.5 (page 12), the IPSHD as providing *'a clear delivery pipeline of new housing and has evidenced increased housing supply and delivery ...'*. The second is to reference the findings of the Inspector in examining the now withdrawn *'Our Local Plan: 2033'* (**CD6.2**).
- 9.22 I address in detail the impact of the IPSHD on affordable housing completions in relation to the OR above. Whilst I do not repeat those points here it should be emphasised that the impact of the IPSHD on affordable housing completions has been small and is very substantially below the level required to meet the level of identified affordable housing need.

- 9.23 In my opinion the IPSHD is not a policy for the delivery of affordable housing and has not resulted '*clear delivery pipeline*' as contended by the Council.
- 9.24 With respect to the Council's second contention, paragraph 8.6 (page 13) of the Council's SoC, that the constraints present in the District '*can reasonably be expected to reduce any future housing requirement.*' The Council cite, paragraph 8.6 (page 13) that in examining the 'Our Local Plan: 2033' (CD6.2) the Inspector '*accepted that Tandridge would not be able to meet its objectively assessed need for housing in full.*'
- 9.25 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...*'
- 9.26 This is not the same as an acceptance that the constraints in the District preclude meeting the objectively assessed needs of the District. Instead, there was insufficient evidence before the Inspector to enable a conclusion to be reached on the extent to which those could be identified or met.
- 9.27 It bears emphasis that 'Our Local Plan: 2033' was not examined against the current iteration of the NPPF. Which not only introduced the Golden Rules for development in the Green Belt but underlined the importance of meeting housing needs in full.
- 9.28 Specifically, paragraph 61 (previously 60) was revised with the removal of the words '*as much of*' and '*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].'*

- 9.29 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.<sup>34</sup> 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* [my emphasis].’
- 9.30 In the absence of an up-to-date or NPPF compliant assessment of affordable housing need or Development Plan for the District it is not clear to what extent the constraints present in the District would limit a future Development Plan. What is clear is that the existing Development Plan and the IPSHD have failed to deliver sufficient affordable housing to meet the needs of the District.
- 9.31 Recent appeals in Tandridge have consistently concluded that the scale of the shortfall is such that the Council’s efforts to increase the delivery of affordable housing whilst commendable were insufficient. These decisions are summarised in **Appendix JS6** of my evidence, but the most recent of these to expressly consider the point, Land at Chichele Road (December 2024),<sup>35</sup> bears emphasis; paragraph 79 of the Inspector’s decision states:
- ‘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).’
- 9.32 It will be of little comfort to those in need of affordable housing now that the Council considers its ability to meet their needs to be limited. The appeal proposal represents a clear opportunity to assist in meeting ‘*demonstrable*’ and ‘*acute*’ need for affordable housing in the District.

### Summary and Conclusions

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

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<sup>34</sup> 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.

<sup>35</sup> CD10.47.

- 9.34 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.
- 9.35 In my opinion, the Council has thus far sought to downplay the provision of 50% of the appeal scheme, up to 166 C3 dwellings and up to 41 C2 extra care units, as affordable dwellings 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

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## 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 the up to 166 C3 dwellings and up to 41 C2 extra care units, of which 50% will be 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 (**CD10.34**) 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 (**CD10.35, 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% 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 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

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## 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 An 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 (**CD10.36**). 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)
- 11.6 I agree, the recipients of affordable homes here will not describe their needs as generic.

11.7 Considering the Tandridge District Council lamentable record of poor affordable housing delivery, high and rising numbers of households on then 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 affordable dwellings on this site should be afforded **very substantial weight** in the determination of this appeal.

### **Relevant Secretary of State and Appeal Decisions**

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

11.9 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**

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

11.11 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**

11.12 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.

11.13 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.

11.14 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.

11.15 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 50% of the appeal scheme, up to 166 C3 dwellings and up to 41 C2 extra care units, as affordable dwellings 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.