

Affordable Housing Addendum

Scotland Park, Haslemere, Waverley



Affordable Housing Addendum

“Hybrid application consisting of an:

Outline application (all matters reserved except access) for up to 110 residential dwellings accessed from the proposed access road (linking to Midhurst Road), associated landscaping, restricted access for emergency access, community growing space and associated infrastructure, including green infrastructure.

Full application for the erection of 1 dwelling and associated works; a junction alteration from Midhurst Road, associated access road to serve the development (including the diversion of a public footpath), car park, associated landscaping and drainage; the erection of a scout facility/nursery (use class F) and an education facility (use class F); a Suitable Alternative Natural Greenspace (SANG).”

Scotland Park, Haslemere, Waverley

Redwood (South West) Limited

December 2023

PINS REF: APP/R3650/W/23/3327643

LPA REF: WA/2022/01887

OUR REF: M22/0313-03.RPT

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Introduction

Section 1

- 1.1 This Affordable Housing Addendum is prepared by **Tetlow King Planning** on behalf of **Redwood (South West) Limited**.
- 1.2 The proposed development is for up to 111 dwellings, of which 35% (39 dwellings) will be provided as affordable housing on site. This level of provision exceeds the requirements of Policy AHN1 of the adopted Waverley Local Plan Part 1 which seeks 30% affordable housing.
- 1.3 The proposed tenure split of the 39 affordable homes will be secured at Reserved Matters and will reflect the requirements of the development plan and local needs.
- 1.4 The proposed affordable housing will be secured by way of a Section 106 planning obligation.
- 1.5 Providing a significant boost in the delivery of housing is a key priority of the Government's National Planning Policy Framework (2023). Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.6 This Affordable Housing Addendum provides an update to the Affordable Housing Statement prepared by Tetlow King Planning to support the application. It considers the need for affordable housing and the contribution that the proposed development can make towards meeting the affordable housing needs of the Waverley Borough Council administrative area and Haslemere. It concludes that there is a genuine and acute need for the proposed affordable homes.
- 1.7 The Affordable Housing Addendum takes account of a range of affordable housing indicators as well as consideration of national planning policy, performance against plan requirements, affordability issues, and the Council's own corporate objectives. It should be read alongside the application Affordable Housing Statement and the planning and housing land supply evidence.

- 1.8 In undertaking this work, reliance has been placed upon data obtained through a Freedom of Information (“FOI”) request. The request was submitted on 4 July 2023 and a full response was received on 28 July 2023. The full FOI correspondence is included at **Appendix TK1** to this Addendum.
- 1.9 This statement comprises the following six sections:
- Section 2 reviews relevant Development Plan policies and other material considerations relevant to the site;
 - Section 3 provides analysis of affordable housing needs in Waverley;
 - Section 4 illustrates past affordable housing delivery performance in Waverley;
 - Section 5 reviews the future supply of affordable housing in Waverley;
 - Section 6 sets out a range of affordability indicators; and
 - Section 7 discusses the weight to be attached to the proposed affordable housing provision in the context of the appeal.

The Development Plan and Related Policies

Section 2

Introduction

- 2.1 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.
- 2.2 The Development Plan for Waverley Borough Council comprises the Local Plan Part 1: Strategic Policies and Sites (February 2018) and the Local Plan Part 2: Site Allocations and Development Management Policies (March 2023). The site is also subject to the policies of the Haslemere Neighbourhood Plan (November 2021).
- 2.3 Other material considerations include the National Planning Policy Framework (2023) and the Planning Practice Guidance.
- 2.4 This Section considers any updates in Waverley's Development Plan that have occurred since the drafting of the Tetlow King Planning Affordable Housing Statement (dated June 2022) submitted at the application stage (WA/2022/01887) in 2022.

The Development Plan

Local Plan Part 1: Strategic Policies and Sites (February 2018) – CD6.1

- 2.5 The Local Plan Part 1 ("LPP1") sets out the planning policies for Waverley Borough for the 20-year period between 2013 and 2032.
- 2.6 In the context of affordable housing, there have been no changes to the LPP1 document since the determination of the planning application. In order to avoid repetition, please refer to paragraphs 2.4 to 2.20 of the Tetlow King Planning Affordable Housing Statement (June 2022) submitted with the application for content on the LPP1 with regard to affordable housing.
- 2.7 To provide clarity for the purposes of this affordable housing addendum, **Policy AHN1 'Affordable Housing on Development Sites'** sets the Council's over-arching approach to seeking affordable housing. The Council seeks **30% affordable provision** on sites outside designated rural areas of 11 or more dwellings, such as the appeal site.

- 2.8 The proposed development is for up to 130 dwellings, of which **35%** (46 dwellings) will be provided as affordable housing on site. This level of provision therefore **exceeds policy requirements**.
- 2.9 Policy AHN1 also details that the mix, size and tenure split of any proposed affordable homes should accord with up-to-date evidence of housing needs, the information in the latest SHMA, and achieving an appropriate site-specific solution for each site.

Local Plan Part 2: Site Allocations and Development Management Policies (March 2023) – CD6.2

- 2.10 The Local Plan Part 2 (“LPP2”) was adopted by Waverley Borough Council on 21 March 2023. The LPP2 provides a suite of development management policies and allocates sites for housing and other uses consistent with the strategic approach expressed in LPP1.
- 2.11 There are no relevant policies for affordable housing provision in the LPP2 given that the LPP1 sets out the relevant policies for affordable housing.

Haslemere Neighbourhood Plan 2013-2032 (2021) – CD6.3

- 2.12 Please refer to paragraphs 2.22 to 2.35 of the Affordable Housing Statement submitted with the application.

Other Material Considerations

Affordable Housing Supplementary Planning Document (April 2021, updated 2023) – CD7.2

- 2.13 The Affordable Housing Supplementary Planning Document (“SPD”) sets guidance for the application of affordable housing policies contained in LPP1, primarily AHN1 ‘Affordable Housing on Development Sites’ and AHN2 ‘Rural Exceptions Sites’.
- 2.14 The Affordable Housing SPD is addressed in the Affordable Housing Statement, although the Council made a number of updates to the SPD in 2023 which are set out below.
- 2.15 Page three of the updated Affordable Housing SPD (2023) states that *“This update reflects changing policy and practice since the Affordable Housing Supplementary Planning Document was published in April 2021, including the introduction of First Homes.”*

2.16 It is noted that the PPG¹ states that the role of an SPD is to “*build upon and provide more detailed advice or guidance on policies in an adopted local plan*”. Given SPDs do not form part of the development plan, “*they cannot introduce new planning policies into the development plan.*” The following information with regard to affordable housing size, mix and tenure split is therefore guidance for applicants, and not policy.

2.17 Updated guidance is provided on the size, mix and tenure split of affordable housing on qualifying sites at paragraph 54:

“The overall housing target is to provide 60% of the total as social rents or affordable rents. 25% of affordable homes need to be First Homes, in line with the revised National Planning Policy Framework. The remaining 15% are recommended as shared ownership. This recommended mix also meets the national requirement for at least 10% of the homes overall on each site to be available for affordable home ownership. However, it is recognised that the tenure split on each site may vary, having regard to the specific circumstances of the site. All affordable tenures must meet the definitions set out in Annex 2 of the revised National Planning Policy Framework.”

2.18 Further updates included at paragraph 58 of the Affordable Housing SPD (2023) state that:

“The Council is committed to delivering Locally Affordable Homes that local workers and households on low incomes can afford. Social rents for households on the lowest incomes remain a priority for the Council and should be provided on new developments whenever possible. However, where this is not viable, affordable rents should be capped at 70% for 1 and 2 beds and 65% for 3 and 4 bed homes (including service charges) or the current Local Housing Allowance rate for the area; whichever is lower, in order to be affordable to local households.”

2.19 Although the SPD was consulted on before its adoption, the capping of affordable rents do not appear to have been viability tested and so remain solely as guidance for applicants. The capping of affordable rents to 65% and 70% respectively is not currently a requirement of the adopted development plan for Waverley or national planning policy.

¹ Paragraph: 008 Reference ID: 61-008-20190315

- 2.20 First Homes are discussed from paragraph 70. Paragraph 71 clarifies that 25% of affordable homes on site should be provided as First Homes. Paragraphs 73 and 74 sets out the requirements of a S106 Agreement to secure First Homes and Waverley's local criteria for First Homes.
- 2.21 The proposed tenure split of the 39 affordable homes will be secured at Reserved Matters and will reflect the requirements of the development plan and local needs.

Waverley Corporate Strategy 2020-2025 (October 2020) – CD7.55

- 2.22 The Waverley Corporate Strategy 2020-2025 sets out the Council's Vision and Priorities for the five-years from 2020 to 2025.
- 2.23 The Council's Vision is presented on page four. The Vision includes promoting *"housing to buy and to rent, for those at all income levels."*
- 2.24 On page five, the Council lists its Strategic Priorities for the 2020 to 2025 period. One of the priorities is to deliver *"Good quality housing for all income levels and age groups"*.
- 2.25 This Strategic Priority is discussed further on page five, with the Council stating that it will *"...optimise the availability of housing that meets the needs of local people at all income levels..."*. The Council describes (page five) that it will achieve this vision by:
- *"delivering Waverley's new Housing Strategy to ensure homes are the right homes in the right places and that they are truly affordable for those who need them"*
 - *preventing homelessness and meeting housing needs, including needs for supported accommodation and housing for older people*
 - *working in partnership with social housing providers to deliver good quality homes, building and managing communities which are sustainable in the long term*
 - *continuing to secure affordable housing on new developments in line with planning policy and ensuring developers meet their planning obligations."*

Conclusions on the Development Plan and Related Policies

- 2.26 The adopted Development Plan in Waverley Borough consists of the Local Plan Part 1: Strategic Policies and Sites 2013-2032, adopted February 2018, alongside saved policies of the Local Plan 2002. The Haslemere Neighbourhood Plan, made November 2021, is also applicable in this case.

- 2.27 In combination with the information presented in the Affordable Housing Statement, the evidence clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority for Waverley Borough Council.
- 2.28 The application proposals will provide an affordable housing contribution which exceeds the requirements of Local Plan Policy AHN1.

Affordable Housing Needs

Section 3

The Development Plan

- 3.1 The adopted Local Plan Part 1 does not set any annual targets for affordable housing provision. However, adopted policy AHN1 seeks 30% affordable provision on sites of 6 dwellings or more in designated rural areas, 11 dwellings or more outside of designated rural areas, or with a combined gross floorspace of 1,000 sqm.

Affordable Housing Needs Evidence Base

- 3.2 It is important to consider the objectively assessed need for affordable housing within the most up-to-date assessments of local housing need.
- 3.3 As of December 2023, in Waverley, this evidence is contained within the West Surrey Strategic Housing Market Assessment (2015) (the “SHMA”) and the Waverley Housing Affordability Study (2021).
- 3.4 This position has not changed since the production of the Affordable Housing Statement. However, for clarity for the purposes of this affordable housing addendum, the key findings of both assessments are set out below.

West Surrey Strategic Housing Market Assessment (2015) – CD7.56

- 3.5 The analysis within the West Surrey Strategic Housing Market Assessment (“SHMA”) (2015) is based upon meeting affordable housing need over the 20-year period from 2013/14 to 2032/33. It covers a housing market area which includes the administrative areas of Guildford Borough Council, Waverley Borough Council and Woking Borough Council.
- 3.6 The 2015 SHMA forms part of the evidence base for the LPP1 (2018).
- 3.7 Table 42 titled ‘Estimated Level of Housing Need (per annum)’ on page 96 of the 2015 SHMA identifies a total annualised requirement of **314 affordable dwellings per annum in Waverley for the 20-year period between 2013/14 and 2032/33.**

- 3.8 In addition to the September 2015 SHMA report, a Waverley Sub Area Addendum dated November 2015 expands upon the overall assessment contained in the 2015 SHMA and sets out the affordable housing need figures for five 'sub areas' within Waverley. One of the five 'sub areas' is the town of Haslemere, to which the appeal site relates.
- 3.9 Table 13 titled 'Estimated Level of Housing Need (per annum)' on page nine of the SHMA Addendum 2015 shows the breakdown of affordable housing need by sub areas. For the sub area of Haslemere, the net annual need is **25 dwellings per annum for the 20-year period between 2013/14 and 2032/33.**
- 3.10 It should be highlighted that the 2015 SHMA was produced prior to the revision of the NPPF definition of affordable housing in 2018 which was broadened to include a wider variety of tenures to meet specific needs. The level of affordable housing need identified by the 2015 SHMA should therefore be treated as a minimum figure.

Waverley Housing Affordability Study (2021) – CD7.50

- 3.11 The Waverley Housing Affordability Study (2021) informs the Council's Affordable Housing Delivery Strategy (2022) and considers the new affordable housing products introduced by the NPPF (2018), including products such as Discounted Market Sale Homes. The 2021 Study presents the assessed annual affordable housing need for the period 2020/21 to 2031/32 in Waverley.
- 3.12 Figure 3.1 titled 'Annual Affordable Housing Need by Sub-Area' on page 48 of the 2021 Study identifies a need for **770 affordable homes per annum in Waverley for the 12-year period between 2020/21 and 2031/32.**
- 3.13 This is significantly higher than the 314 affordable homes per annum identified by the 2015 SHMA. Of these 770 affordable homes, 390 (51%) are for rented affordable tenures, and 380 (49%) are for affordable home ownership products.
- 3.14 Figure 3.1 of the Study also provides affordable housing need by sub-area for Waverley. **Within Haslemere, there is an identified need for 118 affordable homes per annum for the 12-year period between 2020/21 and 2031/32.** Again, this figure is much higher than the 25 affordable homes per annum identified by the 2015 SHMA. Of these 118 affordable homes, 55 (46%) are for affordable rented, and 63 (54%) are for affordable home ownership products.

Conclusions on Affordable Housing Needs

- 3.15 The 2021 Waverley Housing Affordability Study provides the most up to date assessment of affordable housing need in Waverley. It identifies that there is a substantial on-going need for affordable housing across Waverley of 770 affordable homes per annum for the 12-year period between 2020/21 and 2031/32.
- 3.16 The 2015 SHMA was produced prior to the revision of the NPPF definition of affordable housing in 2018; therefore the level of affordable housing need identified by the 2015 SHMA is considered out of date and should be treated as a minimum figure for identified affordable housing needs.
- 3.17 In circumstances where affordable housing needs may be met in the short term on a local or 'sub-area' basis, it should be stressed that the requirement is to deliver affordable housing in Waverley to meet district wide needs.
- 3.18 It is clear that there is an acute need for affordable housing in a variety of tenures in Waverley and that the provision of new affordable housing is an important and pressing issue in the authority area.

Affordability Housing Delivery

Section 4

- 4.1 This Section provides an update to Section 3 of the Affordable Housing Statement submitted with the application.
- 4.2 No updates are provided in terms of local affordable housing delivery in Haslemere East Ward given that no further housing delivery figures have been published for the Ward area since the production of the Affordable Housing Statement.

Past Affordable Housing Delivery

- 4.3 Figure 4.1 illustrates the delivery of affordable housing ("AH") in Waverley since the start of the LPP1 period in 2013/14.

Figure 4.1: Gross Additions to Affordable Housing Stock, 2013/14 to 2021/22

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2013/14	137	18	13%
2014/15	230	105	46%
2015/16	232	62	27%
2016/17	403	66	16%
2017/18	519	60	12%
2018/19	342	75	22%
2019/20	605	186	31%
2020/21	684	184	27%
2021/22	710	230	32%
Total	3,862	986	26%
Avg. Pa.	429	110	26%

Source: DLUHC Live Tables 122 and 1008c

- 4.4 Between 2013/14 and 2021/22, a total of 3,862 dwellings were delivered, equivalent to 429 per annum. Of these, 986 dwellings were affordable tenures, equivalent to 110 per annum. This equates to 26% gross affordable housing delivery.
- 4.5 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 Provider² (“RP”) affordable housing stock.
- 4.6 Figure 4.2 below calculates the affordable housing delivery per annum since the start of the LPP1 period in 2013/14, net of Right to Buy sales. A net loss of 143³ affordable dwellings over this period equates to 15% of the gross affordable housing completions of 986 affordable dwellings over the nine-year period.

² RtB data on RP sales of affordable housing to RP tenants is contained in the annual Statistical Data Returns (‘SDR’) data sets for the period 2011/12 to 2021/22 published by the Regulator of Social Housing. These figures have been combined on an annual basis to produce total Right to Buy sales.

³ $(145 + 2) - 4 = 143$ dwellings

Figure 4.2: Net of Right to Buy Additions to Affordable Housing Stock, 2013/14 to 2021/22

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
	<i>A</i>	<i>B</i>	<i>C</i>	<i>D</i>	<i>E</i>	<i>F</i> (<i>B</i> + <i>C</i>) - (<i>D</i> + <i>E</i>)	<i>G</i> (<i>F</i> / <i>A</i>) X 100
2013/14	137	18	n/a	13	0	5	4%
2014/15	230	105	n/a	9	0	96	42%
2015/16	232	62	n/a	15	1	46	20%
2016/17	403	66	n/a	23	0	43	11%
2017/18	519	60	0	14	0	46	9%
2018/19	342	75	0	14	0	61	18%
2019/20	605	186	0	14	0	172	28%
2020/21	684	184	0	15	1	168	25%
2021/22	710	230	4	28	0	206	29%
Total	3,862	986	4	145	2	843	22%
Avg. Pa.	429	110	0.4	16	0.2	94	22%

Source: DLUHC Live Tables 122, 1008c, 691 and 693c; Statistical Data Returns 2011-2022

- 4.7 Figure 4.2 demonstrates that on average between 2013/14 and 2021/22, the council has added just 94 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 22% of the total average number of net housing completions. This figure is likely to fall even further if demolitions to existing stock were to be accounted for.
- 4.8 The above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Waverley faster than the replacements from acquisitions.
- 4.9 The seriousness of the impact was considered in a Newspaper article in the Independent newspaper in June 2020. The article is attached as **Appendix TK2**. The reporter considered how Council housing sell-off continues as government fails to replace most homes sold under Right to Buy.
- 4.10 It advised that, *“Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show.”* It went on to say that *“Housing charities warned that enough “desperately needed” genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show”.*
- 4.11 The articles goes on to quote Jon Sparkes, chief executive at homelessness charity Crisis, who said: *“These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.”*
- 4.12 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.
- 4.13 The recent comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery Compared to Affordable Housing Needs

West Surrey SHMA 2015

- 4.14 Figure 4.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 314 net affordable dwellings per annum between 2013/14 and 2032/33, as set out in the 2015 SHMA.

Figure 4.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2015 SHMA, 2013/14 to 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	2015 SHMA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2013/14	5	314	-309	-309	2%
2014/15	96	314	-218	-527	31%
2015/16	46	314	-268	-795	15%
2016/17	43	314	-271	-1,066	14%
2017/18	46	314	-268	-1,334	15%
2018/19	61	314	-253	-1,587	19%
2019/20	172	314	-142	-1,729	55%
2020/21	168	314	-146	-1,875	54%
2021/22	206	314	-108	-1,983	66%
Total	843	2,826	-1,983	-1,983	30%
Avg. Pa.	94	314	-220	-220	30%

Source: DLUHC Live Tables 122, 1008c, 691 and 693c; Statistical Data Returns 2011-2022; 2015 SHMA

- 4.15 Since the start of the 2015 SHMA period in 2013/14 affordable housing completions (net of Right to Buy) have averaged just 94 net affordable dwellings per annum, against a need of 314 net affordable dwellings per annum. A shortfall of 1,983 affordable dwellings has arisen over the nine-year period, equivalent to an average annual shortfall of -220 affordable dwellings.
- 4.16 As demonstrated by Figure 4.3, delivery of only 843 affordable homes net of Right to Buy over the period means that just 30% of identified affordable housing needs were met. Put another way 70% households in need of an affordable home were let down by the councils inability to deliver.

Waverley Affordability Report 2021

- 4.17 Figure 4.4 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 770 net affordable dwellings per annum between 2020/21 and 2031/32, as set out in the 2021 Waverley Affordability Report.

Figure 4.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2021 Waverley Affordability Report, 2020/21 to 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	2015 SHMA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	168	770	-602	-602	22%
2021/22	206	770	-564	-1,166	27%
Total	374	1,540	-1,166	-1,166	24%
Avg. Pa.	187	770	-583	-583	24%

Source: DLUHC Live Tables 122, 1008c, 691 and 693c; Statistical Data Returns 2011-2022; 2021 Waverley Affordability Report

- 4.18 Since the start of the 2021 Waverley Affordability Report period in 2020/21 affordable housing completions (net of Right to Buy) have averaged just 187 net affordable dwellings per annum, against a need of 770 net affordable dwellings per annum. A shortfall of 1,166 affordable dwellings has arisen over the two-year period, equivalent to an average annual shortfall of -583 affordable dwellings.
- 4.19 As demonstrated by Figure 4.3, delivery of only 374 affordable homes net of Right to Buy over the period means that just 24% of identified affordable housing needs were met. Put another way 76% households in need of an affordable home were let down by the councils inability to deliver.

Conclusions on Affordable Housing Delivery

- 4.20 The above evidence demonstrates that across Waverley, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 4.21 In the nine-year period since the start of the LPP1 period in 2013/14 net of Right to Buy affordable housing delivery represented just 22% of overall housing delivery, equating to just 94 affordable dwellings per annum.

- 4.22 Against the identified needs of the 2015 SHMA, in the nine-year period between 2013/14 and 2021/22, the Council averaged a net affordable housing delivery of just 94 dwellings per annum, against an identified need of 314 net affordable dwellings per annum. A shortfall of 1,983 affordable dwellings has arisen over the nine-year period, equivalent to an average annual shortfall of -220 affordable dwellings.
- 4.23 Against the more recent identified needs in the 2021 Waverley Affordability Report, in the two-year period between 2020/21 and 2021/22, the Council averaged a net affordable housing delivery of 187 dwellings per annum, against an identified need of 770 net affordable dwellings per annum. A shortfall of 1,166 affordable dwellings has arisen over the two-year period, equivalent to an average annual shortfall of -583 affordable dwellings.
- 4.24 It is clear that a 'step change' in affordable housing delivery is needed now in Waverley to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 4.25 In light of the identified level of need there can be no doubt that the delivery of up to 39 affordable dwellings (above policy compliant levels) on the proposed site will make an important contribution to the affordable housing needs of Waverley.

Future Supply of Affordable Housing

Section 5

- 5.1 The future delivery of affordable housing is highly uncertain. Within Waverley the delivery of affordable homes has fluctuated considerably since the start of the LPP1 period in 2013/14, as illustrated in Figures 4.1 and 4.2.
- 5.2 The delivery of a higher number of affordable homes in one year obviously does not guarantee this will continue for future years. The supply of affordable housing is affected by the local market factors, including the number of sites with planning permission and also wider national factors including availability of public funding.
- 5.3 The Housing Land Supply evidence provided by the Appellant shows that overall completions have reached a 'high tide' mark and overall completions are set to fall over the remainder of the development plan period to 2031/32.
- 5.4 The Council published its Five Year Housing Land Supply Statement ("5YHLS") in October 2023 (**CD7.12**), covering the period 1 April 2023 to 31 March 2028.
- 5.5 If we were generously to assume that all 2,943 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (i.e. 30%) as a proportion of overall housing completions, this is likely to deliver only 883 affordable dwellings over the period, equating to just 177 new affordable dwellings per annum.
- 5.6 This falls substantially below the 2021 Waverley Affordability Report identified needs of 770 affordable homes per annum between 2020/21 and 2031/32.
- 5.7 As Figure 4.2 of this Addendum highlights, affordable housing provision has slipped far below the policy compliant 30% since the start of the plan period in 2013/14 up to 2021/22. Average delivery on a per annum basis over the same period has been just 94 affordable homes net of Right to Buy.
- 5.8 Consequently, TKP has 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, being granted planning permission now in order to boost the supply of affordable housing

Conclusions on Future Affordable Housing Supply

- 5.9 In light of the Council's poor record of affordable housing delivery, the volatility of future affordable housing delivery and the level of affordable housing needs identified there can be no doubt that the provision of up to 39 affordable dwellings on this site to address the district-wide needs of Waverley should be afforded **substantial weight** in the determination of this appeal.

Affordability Indicators

Section 6

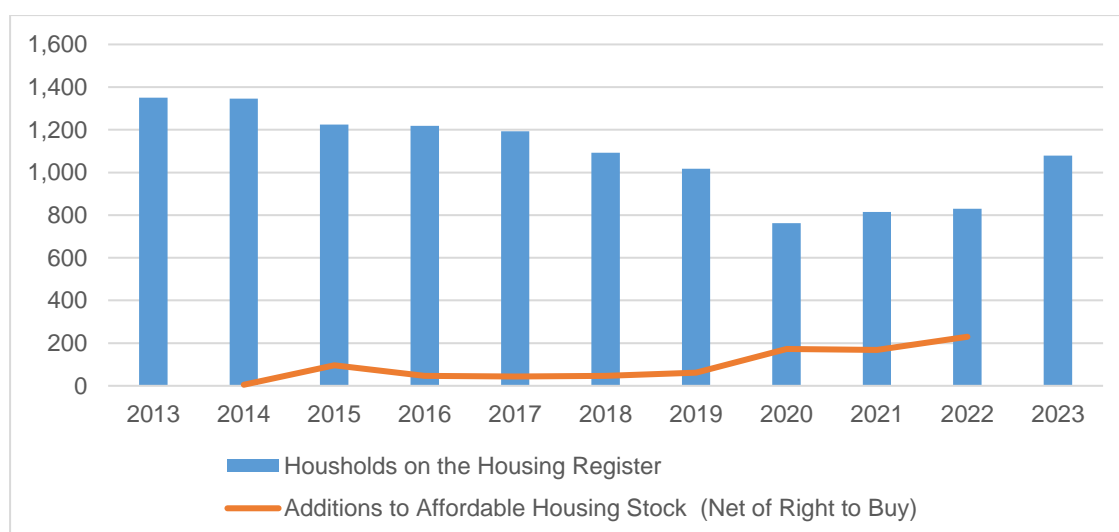
Market Signals

- 6.1 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.
- 6.2 This Section provides an update to Section 4 of the Affordable Housing Statement submitted with the application.

Housing Register

- 6.3 The Council's Freedom of Information response (**Appendix TK1**) confirms that as at 31st March 2023 there were 1,079 households on the Housing Register. This represents a 30% increase in a single year from 830 households at 31 March 2022 (which itself was a 2% increase from 815 households at 31 March 2021).
- 6.4 Figure 6.1 provides a comparative analysis of the number of households on the Housing Register and affordable housing delivery (net of Right to Buy) across Waverley since the start of the LPP1 period in 2013.

Figure 6.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2013 to 2023



Source: DLUHC Live Table 600, 122, 1008c, 691 and 693c; Statistical Data Returns 2011-2022

Note: completions figures are not yet available for the 2022/2023 monitoring period

- 6.5 As Figure 6.1 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 Waverley since 2013.
- 6.6 The Affordable Housing Statement sets out the effects of the Localism Act on the number of households on the housing register. Evidently the result of the Localism Act is that many local authorities, including Waverley, have been able to exclude applicants already on Housing Register waiting lists who no longer meet a new narrower criteria but who are still in need of affordable housing.
- 6.7 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.
- 6.8 It may also have other negative impacts when you consider that those who are excluded from the register may be forced to move away from Waverley to cheaper more affordable areas but due to their connections to the area, they still have to commute back into the area to visit friends, family and travel to their place of work.
- 6.9 One clear impact of this is that such an eventuality would generate extra traffic which brings in to question the sustainability of such an approach.
- 6.10 In an appeal decision at Oxford Brookes University Campus at Wheatley, (CD9.41) Inspector DM Young asserted at paragraph 13.101 of their report 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” (Emphasis added).

- 6.11 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”.

- 6.12 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”.

- 6.13 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.
- 6.14 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. affordable rented, starter homes, 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.
- 6.15 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 a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, TKP suggest, the Government intends to assist by increasing the range of affordable housing types in the most recent NPPF.
- 6.16 The Franklands Drive Secretary of State appeal decision in 2006 (**CD9.42**) 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.
- 6.17 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.

Waiting Times

- 6.18 The wait to be housed in an affordable home within the area ranges from 1,355 days for a 1-bed affordable home through to 73 days for a 4-bed+ affordable home.
- 6.19 The waiting times for all affordable property sizes is set out at Figure 6.2 below and presents further stark evidence of a deteriorating affordable housing crisis afflicting Waverley.

Figure 6.2: Housing Register Average Waiting Times, March 2023

Size of Affordable Property	Average Waiting Time to be Housed at 31 March 2023
1-bedroom home	1,355 days (3.7 years)
2-bedroom home	897 days (2.5 years)
3-bedroom home	741 days (2.0 years)
4+ bedroom home	73 days (0.2 years)

Source: Freedom of Information response (28 July 2023)

Help to Buy Register

- 6.20 Further evidence in respect of the need across Waverley for affordable housing is provided in information from Help to Buy South.
- 6.21 Help to Buy South was one of three agents appointed by the Government to help provide Help to Buy schemes across England. They covered the South of England. Households who were seeking shared ownership homes are required to register with Help to Buy South so that they may apply for properties.
- 6.22 The Help to Buy Register provides details of those seeking shared-ownership accommodation in the south of England. This demonstrates that as of 24 March 2023, 685 households were seeking a shared ownership home in Waverley. This is clearly a significant proportion of those seeking assistance with their housing.

Temporary Accommodation

- 6.23 While the FOI response details that zero households were housed in temporary accommodation within the Waverley region at 31 March 2023, there were eight households were housed in temporary accommodation outside the Waverley region.
- 6.24 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.

- 6.25 The “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” report 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.
- 6.26 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

- 6.27 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 767 households in need of homelessness prevention duty⁴, and a further 755 households in need of relief duty⁵ from the Council.
- 6.28 Furthermore a 2017 Homelessness 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. The proportion of households accepted as homeless by local authorities due to the end of an assured shorthold tenancy increased from 11% during 2009-10 to 32% during 2016-17. The proportion in London increased during the same period from 10% to 39%. Across England, the ending of private sector tenancies accounts for 74% of the growth in households who qualify for temporary accommodation since 2009-10. Before this increase, homelessness was driven by other causes. These included more personal factors, such as relationship breakdown and parents no longer being willing or able to house children in their own homes. The end of an assured shorthold tenancy is the defining characteristic of the increase in homelessness that has occurred since 2010.” (Emphasis in original).

⁴ 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.

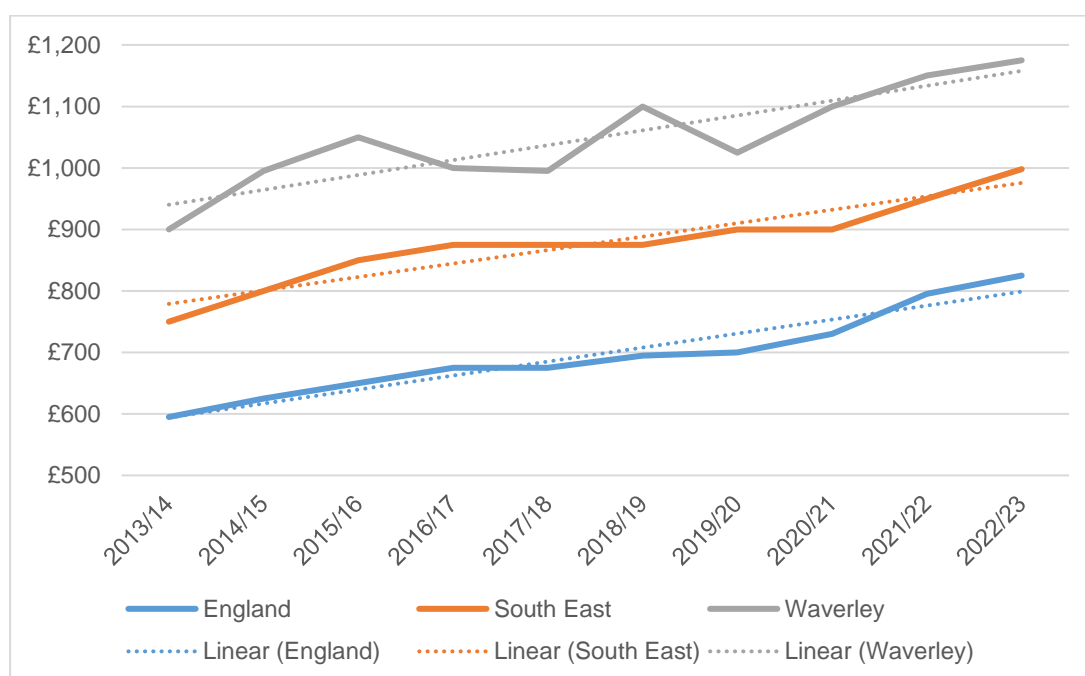
⁵ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.

- 6.29 The NAO report also noted that *“The affordability of tenancies is likely to have contributed to the increase in homelessness”* and that *“Changes to Local Housing Allowance are likely to have contributed to the affordability of tenancies for those on benefits, and are an element of the increase in homelessness.”*

Private Rental Market

- 6.30 Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data (first produced in 2013/14) show that median private rents in Waverley stood at £1,175 per calendar month (“pcm”) in 2022/23. This represents a 31% increase from 2013/14 where median private rents stood at £900 pcm.

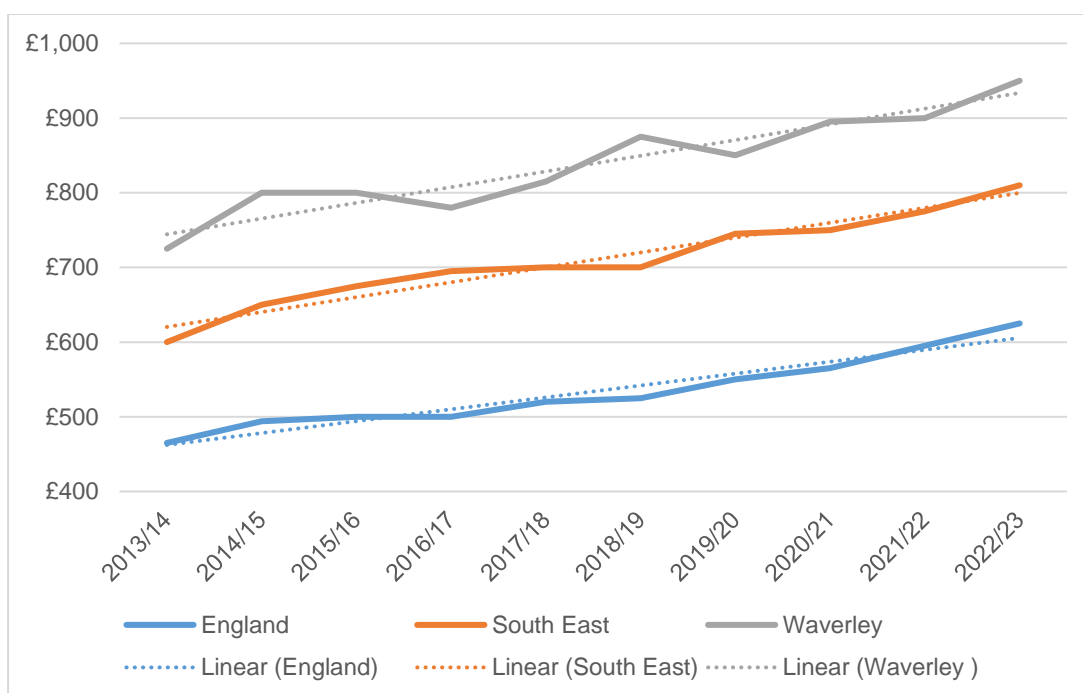
Figure 6.3: Median Private Sector Rents, 2013/14 to 2022/23



Source: VOA and ONS Private Rental Market Statistics

- 6.31 A median private rent of £1,175 pcm in 2022/23 is 18% higher than the South East figure of £998 pcm and 42% higher than the national figure of £825 pcm.
- 6.32 Lower quartile private sector rents are representative of the ‘entry level’ of the private rented sector and include dwellings sought by households on lower incomes.
- 6.33 The average lower quartile monthly rent in Waverley in 2022/23 was £950 pcm. This represents a 31% increase from 2013/14 where average lower quartile monthly rents stood at £725 pcm.

Figure 6.4: Lower Quartile Private Sector Rents, 2013/14 to 2022/23



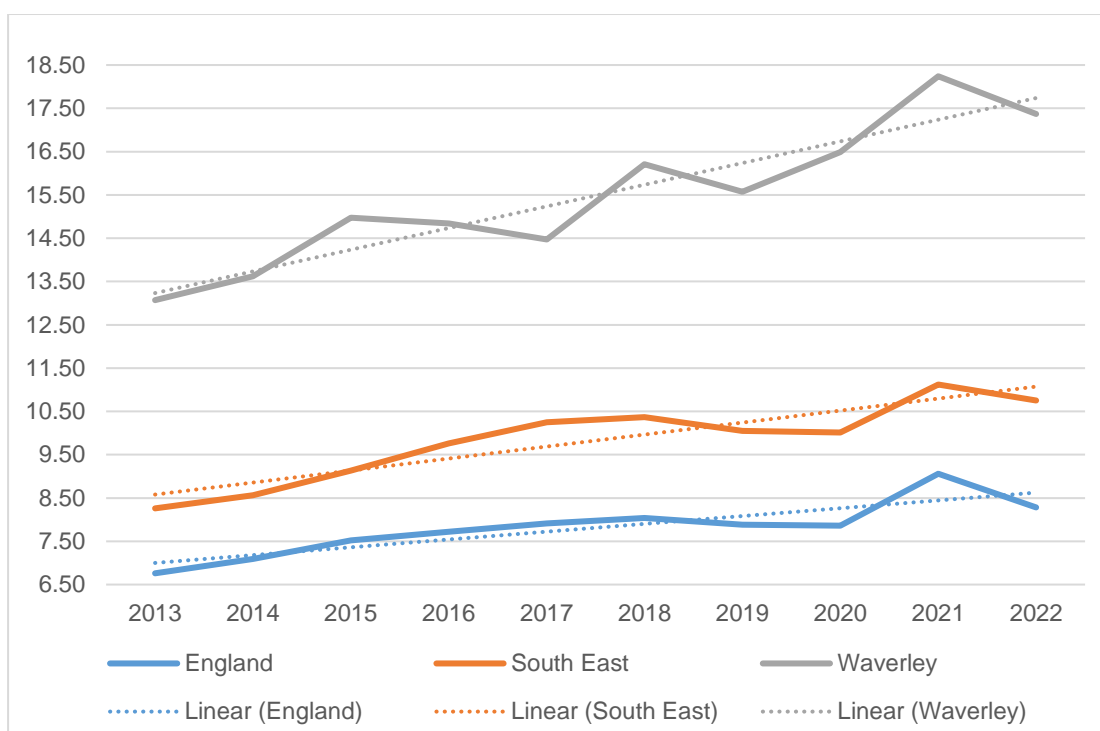
Source: VOA and ONS Private Rental Market Statistics

- 6.34 A lower quartile rent of £950 pcm in 2022/23 is 17% higher than the South East figure of £810 pcm and 52% higher than the national figure of £625 pcm.

Median House Prices

- 6.35 The ratio of median house prices to median incomes in Waverley now stands at 17.37, a 33% increase since the start of the LPP1 period in 2013/14 where it stood at 13.07. This means that those on median incomes in Waverley, seeking to purchase a median priced property, now need to find more than 17 times their annual income to do so.
- 6.36 As demonstrated by Figure 6.5 below, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 6.37 A median ratio of 17.37 in Waverley stands significantly above the national average of 8.28 (+110%) and the South East average of 10.75 (+62%).

Figure 6.5: Median Workplace-Based Affordability Ratio comparison, 2013 to 2022

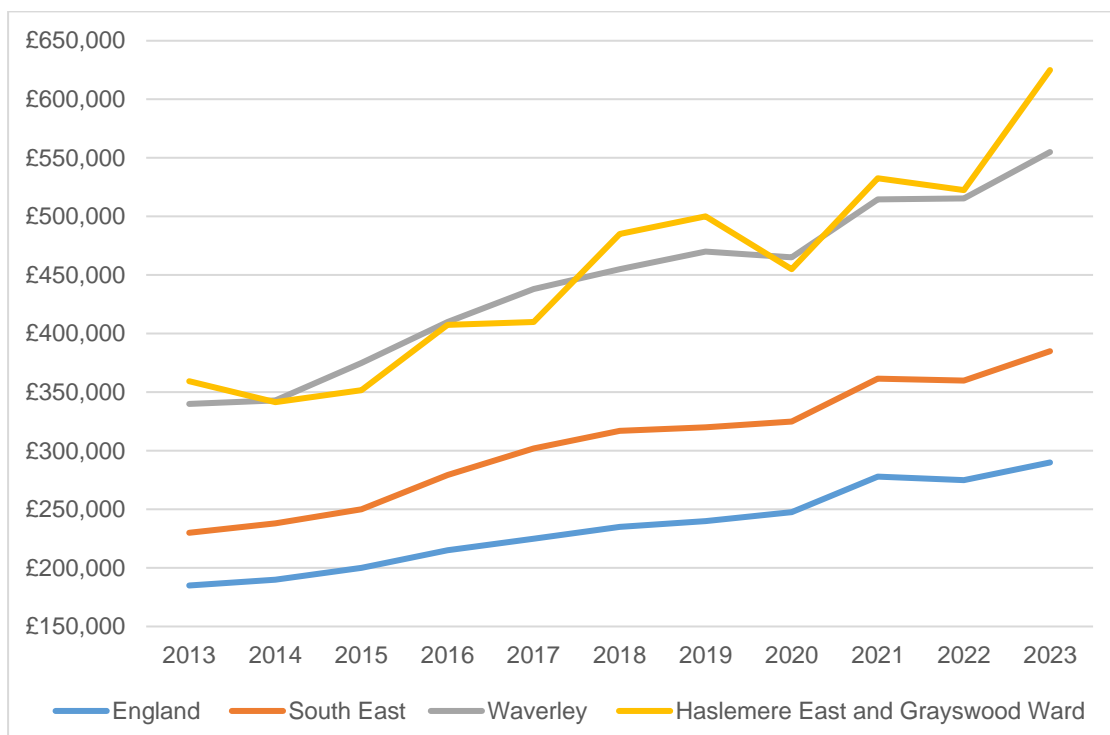


Source: ONS Ratio of House Price to Work-place Based Earnings

- 6.38 Furthermore, a median ratio of 17.37 in Waverley makes it by far the most unaffordable authority area in the West Surrey Housing Market Area given that the median affordability ratio for Guildford in 2022 was 12.67, and lower again in Woking at 11.07.
- 6.39 It is worth noting that a figure of 8 times average incomes was described as problematic by the former Prime Minister in the foreword to the White Paper entitled – Fixing our Broken Housing Market. Here, the affordability ratio is some 117% higher than that and rising.
- 6.40 Figure 6.6 illustrates the median house sale prices for England, the South East, Waverley and Haslemere East and Grayswood Ward. It demonstrates that they have increased dramatically between the start of the LPP1 period in 2013 and 2023.
- 6.41 The median house price across Waverley has risen by 63% from £340,000 in 2013 to £555,000 in 2023. This compares to a 67% increase across the South East and a national increase of 57% over the same period.
- 6.42 The median house price across Haslemere East and Grayswood Ward has risen at an even quicker rate than across Waverley; 74% from £359,500 in 2013 to £625,000 in 2023.

- 6.43 In 2023, median house prices in Waverley (£555,000) were 44% higher than across the South East (£385,000) and 91% higher than the national figure (£290,000).
- 6.44 In the 12-month period between March 2022 and March 2023 median house price across Waverley has increased by 8% from £515,537 to £555,000. An increase of 20% was observed over the same period in Haslemere East and Grayswood Ward where median house prices climbed from £522,500 to £625,000.

Figure 6.6: Median House Price Comparison, 2013 to 2023

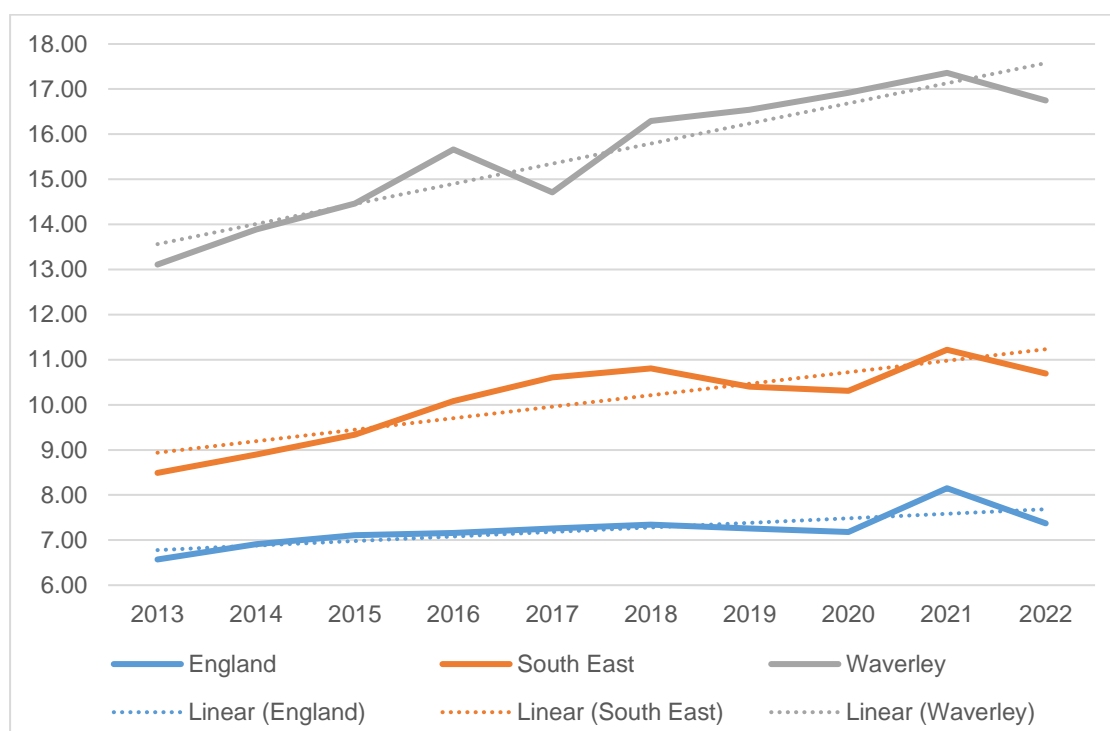


Source: ONS HPSSA Datasets

Lower Quartile House Prices

- 6.45 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 Waverley now stands at 16.75, a 28% increase since the start of the LPP1 period in 2013 where it stood at 13.11. This means that those on lower quartile incomes in Waverley, seeking to purchase a median priced property, now need to find almost 17 times their annual income to do so.
- 6.46 As demonstrated by Figure 6.7, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 6.47 Once again it remains the case that the ratio in Waverley stands significantly above the national average of 7.37 (+127%) and the South East average of 10.69 (+57%).

Figure 6.7: Lower Quartile Workplace-Based Affordability Ratio comparison, 2013 to 2022

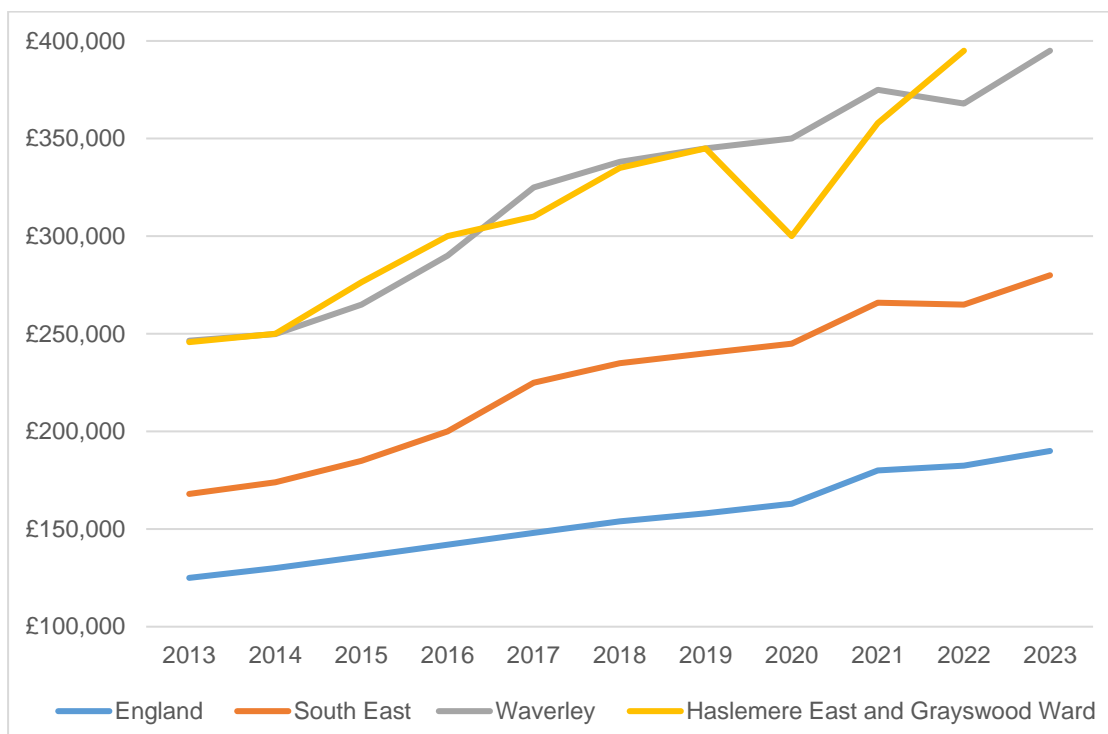


Source: ONS Ratio of House Price to Work-place Based Earnings

- 6.48 As with median ratios, a lower quartile ratio of 16.75 in Waverley makes it by far the most unaffordable authority area in the West Surrey Housing Market Area given that the lower quartile affordability ratio for Guildford in 2022 was 12.53, and lower again in Woking at 11.12.
- 6.49 It is 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 some 272% higher than that and rising.
- 6.50 Figure 6.8 illustrates the lower quartile house sale prices for England, the South East, Waverley and Haslemere East and Grayswood Ward. It demonstrates that they have increased dramatically between the start of the LPP1 period in 2013 and 2023. Note that the 2023 lower quartile house prices for Haslemere East and Grayswood Ward are not yet available.
- 6.51 The lower quartile house price across Waverley has risen by 60% from £246,500 in 2013 to £395,000 in 2023. This compares to a 67% increase across the South East and a national increase of 52% over the same period.
- 6.52 In 2023, lower quartile house prices in Waverley (£395,000) were 41% higher than across the South East (£280,000) and 108% higher than the national figure (£190,000).

- 6.53 In the 12-month period between March 2022 and March 2023 median house price across Waverley has increased by 7% from £368,000 to £395,000.

Figure 6.8: Lower Quartile House Prices, 2013 to 2023



Source: ONS HPSSA Datasets

- 6.54 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (**CD9.34**) 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" (Emphasis added).*

Conclusions on Affordability Indicators

- 6.55 As demonstrated through the analysis in this section, affordability across Waverley has been and continues to be, in crisis.
- 6.56 House prices and rent levels in both the median and lower quartile segments of the market 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 Waverley out of the reach of more and more people.
- 6.57 Analysis of market signals is critical in understanding the affordability of housing. There is an acute housing crisis in Waverley, with a lower quartile house price to average income ratio of 16.75 in 2022.
- 6.58 Market signals indicate a worsening trend in affordability in Waverley. 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.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 7

- 7.1 The NPPF is clear at paragraph 31 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 7.2 Paragraph 59 of the NPPF sets out the Governments clear objective of “*significantly boosting the supply of homes*” with paragraph 60 setting out that to “*determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment*”.
- 7.3 The NPPF requires local authorities at paragraph 61 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, “*including those who require affordable housing*”.
- 7.4 TKP also notes the findings of Inspector Kevin Ward in July 2015 who considered (and subsequently allowed) an outline planning permission for the erection of up to 90 dwellings with vehicular access on to Hollybush Lane and associated public open space, landscaping, and drainage work on land at Firlands Farm, Hollybush Lane, Burghfield Common, Reading, Berkshire (**CD9.32**).
- 7.5 Mr Ward identified that the individual benefits of a scheme are not transferable, as each development should be considered on its own merits. Mr Ward indicated at paragraph 58 that:

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

- 7.6 The context of this decision is in relation to a previously determined appeal at Mans Hill also located within Burghfield Common (**CD9.36**). Mr Ward set out his comments in relation to the distinction between the two appeals at paragraphs 70 and 71, as below:

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

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

- 7.7 As can be seen in relation to Mr Wards’ comments at paragraph 58, it is for each case to be considered on its individual merits.
- 7.8 Another appeal that considers the issue of benefits is the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at Hawkhurst in Kent (**CD9.33**). 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)

- 7.9 TKP agree, the recipients of 46 homes here will not describe their needs as generic.
- 7.10 Considering the authority's past poor record of affordable housing delivery, high and rising numbers of households on the housing register, there should be no doubt that the provision of up to 39 affordable dwellings on this site should be afforded **substantial weight** in the determination of this appeal.

Relevant Secretary of State and Appeal Decisions

- 7.11 The importance of affordable housing as a material consideration has been reflected in several Secretary of State ("SoS") and appeal decisions.
- 7.12 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 TK3**.

Appeal decision: Land rear of Monkton House (formerly Bindon House), Monkton Lane, Farnham – CD9.4

- 7.13 A recent appeal for the development of 56 new homes in Waverley was approved in November 2023. TKP provided the affordable housing evidence for the Appellant at the appeal. The scheme proposed 40% affordable housing, an offer in excess of policy requirements (30%).
- 7.14 The Inspector recognised at paragraph 26 of their decision that the evidence demonstrated *"a large shortfall in affordable home provision in the Borough."*
- 7.15 The Inspector also acknowledged at paragraph 27 that *"affordability indicators for property show a worsening situation for those at the entry level of the market. For all these reasons, the affordable housing part of the proposal would represent a significant benefit and the proposal would comply with Policy AHN1 of the LPP1."*
- 7.16 At paragraph 40 of their decision, the Inspector awarded **substantial weight** to the delivery of affordable housing on the appeal site in Waverley, further clarifying at paragraph 51 that *"The proposal would boost housing supply and provide affordable housing in accordance with policies of the LPP1, LPP2 and FNP."*
- 7.17 In respect of the enhanced offer of affordable housing, the Inspector stated at paragraph 52 of their decision that *"There would be a greater amount of affordable housing provided than required by the development plan and this would address an urgent need."*

7.18 Further summaries of appeal decisions relevant to this appeal are summarised at **Appendix TK4**.

7.19 Some of the key points to 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

7.20 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.

7.21 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.

7.22 Market signals indicate a worsening trend in affordability across Waverley 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.

7.23 Against the scale of unmet need and the lack of suitable alternatives in the private rented sector across Waverley, there should be no doubt that the provision of up to 39 affordable homes will make a substantial contribution. Considering all the evidence, this contribution should be afforded **substantial weight** in the determination of this appeal.

Appendix TK1

Freedom of Information Correspondence - 28 July 2023



Leonie Stoate

From: Waverley Borough Council <rfi@waverley-chhost02.oncreate.app>
Sent: 28 July 2023 11:09
To: Iwan Evans
Subject: [[AI2/5357]] - Response
Attachments: AI2-5357 Iwan Evans ANSWERS.docx

Dear Iwan Evans

Request for Information – AI2/5357

Thank you for your email to request information which has been processed under the Freedom of Information Act 2000 (FOIA).

Please see the response attached.

In the event you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be made within 40 working days of the initial response. The internal review will be carried out by a separate Council Officer.
Please remember to quote your reference number in all future correspondence.

If you are still not satisfied with the outcome of the internal review, you have the right to apply directly to the information Commissioner for a decision. The Information Commissioner can be contacted at:
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
Telephone: 0303 123 1113
Website: <https://ico.org.uk/>

Yours sincerely,
Freedom of Information
Waverley Borough Council

Can you please provide the following data in line with the provisions of the Freedom of Information Act.

Questions 1 to 9 of this request relate to data held by the Housing Department.

Questions 10 to 13 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2023. **1079**

2. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

- a. 1-bed affordable dwelling; **1355 days**
- b. 2-bed affordable dwelling; **897 days**
- c. 3-bed affordable dwelling; and **741 days**
- d. A 4+ bed affordable dwelling. **73 days**

3. The average waiting times at 31 March 2022 for the following types of affordable property across the Authority:

- a. 1-bed affordable dwelling; **1460 days**
- b. 2-bed affordable dwelling; **859 days**
- c. 3-bed affordable dwelling; and **805 days**
- d. A 4+ bed affordable dwelling. **Information not held**

4. The total number of households on the Council's Housing Register at 31 March 2023 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2023)
Haslemere East Ward	Information not held

5. The average number of bids per property over the 2022/23 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Average Bids Per Property (1 April 2022 to 31 March 2023)
	Haslemere East Ward
1-bed affordable dwelling	Information not held
2-bed affordable dwelling	Information not held
3-bed affordable dwelling	Information not held
4+ bed affordable dwelling	Information not held

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

Please see the document located here: [WBC Housing Allocation Scheme V6 \(waverley.gov.uk\)](https://www.waverley.gov.uk/wbc-housing-allocation-scheme-v6)

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2023 in the following locations:

Location	Total Social Housing Stock (31 March 2023)
Haslemere East Ward	Information not held

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2021 and 31 March 2022; and between 1 April 2022 and 31 March 2023 in the following locations:

Location	Social Housing Lettings	
	1 April 2021 to 31 March 2022	1 April 2022 to 31 March 2023
Haslemere East Ward	Information not held	Information not held

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Waverley Borough Council region on the following dates:

Households in Temporary Accommodation	31 March 2022	31 March 2023
Households Housed within Waverley Borough Council	0	0
Households Housed outside Waverley Borough Council	3	8
Total Households	3	8

Housing Completions

10. The number of NET housing completions in the Waverley Borough Council region broken down on a per annum basis for the period between 2000/01 and 2022/23.
11. The number of NET affordable housing completions in the Waverley Borough Council region broken down on a per annum basis for the period between 2000/01 and 2022/23.
12. The number of NET housing completions in Haslemere East Ward broken down on a per annum basis for the period between 2000/01 and 2022/23.
13. The number of NET affordable housing completions in Haslemere East Ward broken down on a per annum basis for the period between 2000/01 and 2022/23.

10-13

The requested information about NET housing completions and affordable housing completions in Waverley Borough Council broken down from 2001-2022 is publicly available in Authority Monitoring Report (links below). Please note that The Council does not hold records for pre-2001. The numbers of completions are not broken down to Haslemere East Ward but cover the whole Haslemere Parish. Initially in the early monitoring years number include only gross numbers; please note we do not hold the records of the net dwellings for early monitoring years. Later Authority Monitoring Reports include only net dwellings.

- [2021-2022 Authority Monitoring Report](#)
- [2019-2020 Authority Monitoring Report](#)
- [2018-2019 Authority Monitoring Report](#)
- [2017-2018 Authority Monitoring Report](#)
- [2016-2017 Authority Monitoring Report](#)
- [2015-2016 Authority Monitoring Report](#)

- [2014-2015 Authority Monitoring Report](#)
- [2011-2012 Annual Monitoring Report](#)
- [2010-2011 Annual Monitoring Report](#)

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: <ul style="list-style-type: none"> a) Affordable housing for rent b) Starter Homes c) Discounted market sales housing; and d) Other affordable routes to home ownership.^[1]
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

^[1] As defined by Annex 2 of the National Planning Policy Framework (2021) which can be viewed [here](#).

Appendix TK2

Independent News Story - June 2020



Independent PremiumUK news

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

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



Sunday 21 June 2020 09:18

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix TK3

Affordable Housing as a Separate Material Consideration



Affordable Housing as a Separate Material Consideration

- Regarding the weight to be attached to the proposed affordable housing benefits at the appeal site, the need is acute, the benefits are significant, and the weight in the planning balance should be **substantial weight**. Affordable housing is a material benefit and should therefore be awarded its own weight in the planning balance.
- Many appeal decisions issued by Inspectors and the Secretary of State (“SoS”) have recognised affordable housing as an individual benefit and have specifically awarded affordable housing provision its own weight in the planning balance. Some examples are summarised below.

Appeal Ref.	Site Name	Decision Type	Decision	Date	Paragraph Ref.	Weight to Affordable Housing	Paragraph Text
APP/M0655/W/17/3178530	Land at Peel Hall, Warrington	SoS	Allowed	09-Nov-21	24	Very substantial	"He further agrees (IR524) that <u>the provision of affordable housing attracts very substantial weight</u> , for the reasons given."
APP/A2280/W/20/3259868	Land off Pump Lane, Rainham, Kent	SoS	Dismissed	03-Nov-21	33	Substantial	"...The Secretary of State considers that the weight to be afforded to the delivery of housing in the light of the housing land supply shortfall is substantial (all IR12.201). Similarly, the Secretary of State agrees at IR12.202 that for the reasons given there is an acute need for affordable housing and in light of that, <u>the delivery of at least 25% of the residential units as affordable accommodation attracts substantial weight</u> ."
APP/W1850/W/20/3244410	Land North of Viaduct adj. Orchard Business Park, Ledbury	SoS	Allowed	15-Mar-21	27	Substantial	"For the reasons given in IR16.122-16.123, the <u>Secretary of State also gives substantial weight to the delivery of affordable housing</u> ."
APP/Y0435/W/17/3169314	Newport Road and Cranfield Road	SoS	Dismissed	25-Jun-20	32	Significant	"Weighing in favour of the proposal, the Secretary of State affords <u>the provision of affordable housing significant weight</u> and also affords the provision of market housing significant weight."
APP/E5330/W/19/3233519	Land at Love Lane, Woolwich	SoS	Dismissed	03-Jun-20	28	Substantial	"The Secretary of State considers that, in terms of benefits, <u>the provision of housing benefits and affordable housing benefits each carry substantial weight</u> ."

APP/Q3115/W/1 9/3230827	Oxford Brooks University, Wheatley Campus	SoS	Allowed	23-Apr-20	35	Very substantial	<p>35 "...Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, that the delivery of up to 500 houses, 173 of which would be <u>affordable, are considerations that carry very substantial weight.</u>"</p> <p>IR 13.111 "<u>The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight irrespective of the fact that the Council can demonstrate a 3/5YHLS.</u>"</p>
APP/G1630/W/1 8/3210903	Land at Fiddington, Ashchurch near Tewkesbury	SoS	Allowed	22-Jan-20	20	Substantial	<p>"...The Secretary of State agrees with the Inspector, and further considers that <u>the provision of affordable housing in an area with a serious shortfall would be of significant benefit and attracts substantial weight in favour of the proposal.</u>"</p>
APP/A0665/W/1 4/2212671	Darnhall School Lane	SoS	Dismissed	04-Nov-19	28	Substantial	<p>"The Secretary of State agrees that the social benefits of <u>the provision of affordable housing should be given substantial weight</u>, for the reasons set out at IR408-411."</p>
APP/P4605/W/1 8/3192918	Former North Worcestershire Golf Club, Hanging Land, Birmingham	SoS	Allowed	24-Jul-19	33	Significant	<p>30 "Weighing in favour the <u>Secretary of State considers that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.</u>"</p>
APP/E2001/W/1 8/3207411	Hutton Cranswick	Inspector	Dismissed	05-Jun-19	39	Significant	<p>"However, <u>aside from the provision of affordable housing (to which I attach significant weight)</u>, the provisions are essentially intended to mitigate the effect of the development-although they could be of some benefit to the wider public, and I have therefore given them very limited weight."</p>
APP/P0119/W/1 7/3191477	Coalpit Heath, South Gloucestershire	Inspector	Allowed	06-Sep-18	61	Substantial	<p>"There are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing(CBH). <u>They are all important and substantial weight should be attached to each component</u> for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply. <u>The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant—they would still comprise significant social benefits that merit substantial weight.</u>"</p>
APP/L3815/W/1 6/3165228	Land at the Corner of Oving Road and A27, Chichester	Inspector	Allowed	18-Aug-17	63	Substantial	<p>"Moreover, the provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. <u>Consequently I attach substantial weight to this element of the proposal.</u>"</p>

APP/P1425/W/1 5/3119171	Mitchelswood Farm, Newick, Lewes	SoS	Allowed	23-Nov-16	18	Significant	<i>"For the reasons given at IR196-201 the Secretary of State agrees that <u>the provision of 20 affordable homes is a tangible benefit of significant weight.</u>"</i>
APP/G1630/W/1 4/3001706	Cornerways, High Street, Twynning	Inspector	Allowed	13-Jul-15	63	Very substantial	<i>"...Table 7.16 of the Strategic Housing Market Assessment [SHMA] Update [CDA17] identifies that the net annual need for affordable housing in Tewkesbury is 587 dwellings. This is more than twice the equivalent figure for the neighbouring District of Wychavon, despite the fact that Tewkesbury's population is little more than two thirds of that in Wychavon. <u>The Inspector in the Wychavon appeal found that the provision of affordable housing in that case: "...is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission".</u> the Secretary of State agreed. Given the much larger quantum of identified need in Tewkesbury and the magnitude of the accumulated shortfall in affordable housing delivery, <u>it would be appropriate to attribute very substantial weight to this important benefit of the proposal.</u>"</i>
APP/E2001/A/13 /2200981 and APP/E2001/A/14 /221394	Brickyard Lane, Melton Park, East Riding	SoS	Dismissed	25-Jun-15	11	Substantial	<i>"However, he also agrees with the Inspector's conclusion that <u>substantial weight should attach to the proposals in proportion to the contribution they would make to the supply of affordable housing.</u>"</i>
APP/K2420/A/13 /2208318	Land surrounding Sketchley House, Watling Street, Burbage, Leicestershire	SoS	Allowed	18-Nov-14	13 / IR 6.19	Substantial	<i>13. "For the reasons given at IR11.20-IR11.23, the Secretary of State agrees with the Inspector's findings in relation to affordable housing, and with his conclusion at IR11.23 that the need for affordable housing is acute and warrants the provision offered by the appeal proposal." IR 6.19 "In those circumstances, there is no reason to depart from the statutory basis to providing for affordable housing set out in policy 15 of the Core Strategy. The policy takes account of the needs identified in the SHMA (2008) and was found to be sound by the Core Strategy Inspector. Hence, although <u>substantial weight should be given to the affordable housing</u> offered, that weight should not be overwhelming."</i>
APP/H1840/A/1 3/2199085 and APP/H1840/A/1 3/2199426	Pulley Lane, Droitwich Spa	SoS	Allowed	02-Jul-14	23 / IR 8.126	Very significant	<i>23. "For the reasons given at IR8.112-8.126, the Secretary of State agrees with the Inspector's conclusion at IR8.127 that the Council does not have a 5-year supply of housing land and the appeal scheme is necessary to meet the housing needs of the district, including the need for affordable housing." IR 8.126 "It seems to me that the Council has largely ignored the affordable housing need in its evidence. The poor delivery record of the Council has also been largely overlooked. The Council's planning balance is struck without any apparent consideration being given to one of the most important reasons why housing in Droitwich Spa is needed. <u>From all evidence that is before me the provision of affordable housing must attract very significant weight in any proper exercise of the planning balance.</u>[4.47]"</i>

Appendix TK4

Relevant Secretary of State and Appeal Decisions



Relevant Secretary of State and Appeal Decisions

Appendix TK4

- 1.1 Brief summaries of appeal decisions relevant to the appeal at Land at Spruce Close, Exeter, are summarised below. The full decisions are included as Core Documents.

Appeal Decision: Land North of Upper Chapel, Launceston (April 2014) – CD9.35

- 1.2 The Inspector acknowledged at paragraph 41 that the appeal proposal would have a very significant social role in bringing forward 40 affordable housing units, noting that there was an acute shortage of affordable housing in Launceston. The Inspector also noted that the need for additional affordable housing was all the greater having regard to other sites negotiating lower proportions of affordable housing in lieu of other planning obligation contributions.

- 1.3 At paragraph 52 of their report, the Inspector considered that *“there is an acknowledged acute need for affordable housing in this locality and the proposed scheme would bring forward 40 affordable units. This has to be a substantial benefit of the scheme.”* In concluding the Inspector found that the benefits of the proposals outweighed the small degree of policy conflict.

Secretary of State Decision: Pulley Lane, Droitwich Spa (July 2014) – CD9.39

- 1.4 The Inspector recognised that the contribution of the scheme in meeting some of the affordable housing deficit in the area cannot be underestimated (Inspector’s Report, Page 89). The Inspector set out under paragraph 8.123 of their Report that:

“The SOS should be aware that a major plank of the Appellant’s evidence is the significant under provision of affordable housing against the established need Figure and the urgent need to provide affordable housing in Wychavon. If the position in relation to the overall supply of housing demonstrate a general district-wide requirement for further housing, that requirement becomes critical and the need overriding in relation to the provision of affordable housing. The most recent analysis in the SHMA (found to be a sound assessment of affordable housing needs) demonstrates a desperate picture bearing hallmarks

of overcrowding, barriers to getting onto the housing ladder and families in crisis.”

- 1.5 The Inspector continued under paragraph 8.123 of his report to state that *“the SHMA indisputably records that affordability is at crisis point. Without adequate provision of affordable housing, these acute housing needs will not be met. In terms of the NPPF’s requirement to create inclusive and mixed communities at paragraph 50, this is a very serious matter. Needless to say, these socially disadvantaged people were not represented at the Inquiry.”*

- 1.6 The level of significance attached to affordable housing provision was addressed through paragraph 8.124 of the Inspectors Report where he stated that:

“These bleak and desperate conclusions are thrown into even sharper focus by an examination of the current circumstances in Wychavon itself. Over the whole of the District’s area, there is presently a need for 268 homes per annum. These are real people in real need now. Unfortunately, there appears to be no early prospect of any resolution to this problem...Given the continuing shortfall in affordable housing within the District, I consider the provision of affordable housing as part of the proposed development is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission” (Inspectors Report, page 111).

- 1.7 This statement is supplemented at paragraph 8.125 by the Inspector considering that *“from all the evidence that is before me the provision of affordable housing must attract very significant weight in any proper exercise of planning balance.”*

- 1.8 The Secretary of State concluded that both schemes delivered *“substantial and tangible”* benefits, including the delivery of 40% *“much needed”* affordable housing.

Appeal Decision: Oldmixon Road, Weston-super-Mare (10 April 2017) – CD9.37

- 1.9 The appeal proposals made provision for 150 dwellings of which 30% (45 dwellings) would be provided as affordable housing. Paragraph 92 of the Inspectors report acknowledged that the Sustainable Community Strategy *“recognises that one of the main challenges is the growing number of people seeking social housing in the area”* and that *“it is apparent that the need for more affordable housing in North Somerset has been, and continues to be, an issue of concern.”*

- 1.10 The Inspector went on at paragraph 94 to note the 3,608 households on the Housing Register at 1 April 2016 with paragraph 95 referring to the fact that the average waiting

time for an affordable home in North Somerset was 735 days. In addition to which reference was drawn to the 34% increase in homelessness, high levels of affordability ratios and 32% house price increase over the past five years. Following on from this at paragraph 96 he found that *“the need in the district is glaring with a significant number of people having bleak housing prospects for the foreseeable future”*.

- 1.11 Paragraph 101 set out that the Inspector *“remain[ed] content to afford substantial weight to the benefit arising from the market and affordable homes which the scheme would deliver”*

Appeal Decision: Land east of Park Lane, Coalpit Heath, South Gloucestershire (September 2018) – CD9.38

- 1.12 Paragraph 61 of the decision states that *“there are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing (CBH). They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply.”* (my emphasis)

Appeal Decision: Land off Spruce Close, Exeter (August 2022) – CD9.40

- 1.13 Paragraph 46 of the decision is clear that:

“There are key social and economic benefits associated with the provision of up to 93 dwellings. I attribute significant weight to the delivery of market housing in the context of a national policy objective to significantly boost the supply of homes and a less-than-modest HLS shortfall in Exeter, even if it is capable of being rectified in the short term. The proposal would also provide affordable dwellings at a full policy-compliant level and with a mix of dwellings that would contribute to the choice of homes in the City. Given the context of a demonstrably acute and persistent under-delivery of affordable housing, the affordable housing the appeal scheme would realise carries substantial weight in its favour.” (My emphasis).