

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

Land at Barkby Road, Queniborough

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

Outline application for up to 150 dwellings, together with new open space, landscaping and drainage infrastructure, with all matters reserved except for access.

Land at Barkby Road, Queniborough

David Wilson Homes

May 2023

PINS REF: APP/X2410/W/23/3316574

LPA REF: P/20/2380/2

OUR REF: M23/0408-01.RPT

TETLOW KING PLANNING
UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL, BS16 5EL
Tel: 0117 9561916 Email: all@tetlow-king.co.uk

www.tetlow-king.co.uk

Contents

	Executive Summary	
Section 1	Introduction	1
Section 2	Affordable Housing as an Important Material Consideration	4
Section 3	Consequences of Failing to Meet Affordable Housing Needs	6
Section 4	The Development Plan and Related Policies	15
Section 5	Affordable Housing Needs	33
Section 6	Affordable Housing Delivery	35
Section 7	Affordability Indicators	47
Section 8	Future Supply of Affordable Housing	62
Section 9	Council's Assessment of the Application	66
Section 10	Benefits of the Proposed Affordable Housing at the Appeal Site	68
Section 11	The Weight to be Attributed to the Proposed Affordable Housing Provision	71

Appendices

- Appendix JS1 Area Maps
- Appendix JS2 Freedom of Information Correspondence (6 February 2023, 24 February 2023, 21 March 2023 and 9 May 2023)
- Appendix JS3 Extracts from Planning Practice Guidance (March 2014, Ongoing Updates)
- Appendix JS4 Independent Article (June 2020)
- Appendix JS5 Watt a Save by HBF – October 2022
- Appendix JS6 Summary of relevant SoS appeal decisions
- Appendix JS7 Summary of relevant Inspector appeal decisions

Executive Summary

- 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 compelling evidence of need in the Charnwood Borough Council area.
- ii. Outline planning permission is sought for up to 150 dwellings, of which 40% are proposed as affordable homes equivalent to up to 60 affordable homes. This level of provision meets the requirements of Policy CS3 (40%) of the Core Strategy (2015) and significantly exceeds the requirements of emerging Policy H4 (30%).
- iii. The proposed tenure split will be agreed as part of the Reserved Matters application. The proposed affordable housing, along with a scheme to agree the tenure split, will be secured by way of a Section 106 planning obligation.

Key Findings

Corporate Documents

- iv. Corporate documents identify the delivery of affordable housing as a high corporate priority of Charnwood Borough Council. These include the Homelessness and Rough Sleeping Reduction Strategy 2019-2022 and the Housing Strategy 2015-2020.

Affordable Housing Needs

- v. Core Strategy (2015) Policy CS3 set a target of 180 affordable dwellings per annum between 2011 and 2028.
- vi. The 2014 SHMA sets a need of 174 affordable dwellings per annum between 2011 and 2036.
- vii. The 2017 HEDNA identifies an annualised need for 384 affordable dwellings per annum between 2011 and 2036.
- viii. The 2020 HNA requires 469 affordable dwellings per annum between 2020 and 2037.
- ix. The most recent assessment of affordable housing need is contained within the 2022 HENA which sets a need of 827 affordable dwellings per annum between 2021 and 2031.

- x. As can be seen each successive needs study has identified a higher net annual requirement for affordable housing. The annual need by 2021 is almost 5 times the annual need at the start of the core strategy period.

Affordable Housing Delivery

- xi. Since the start of the Core Strategy (2015) period, only 1,498 affordable dwellings have been delivered, equivalent to 137 per annum. This rate of delivery equates to 16% affordable housing delivery against the total number of housing completions.
- xii. This level of affordable housing delivery has resulted in a shortfall of -2,726 affordable dwellings between 2011/12 and 2021/22 as required by the 2017 HEDNA, equivalent to a deficit of -248 per annum.
- xiii. Against the most recent assessment of affordable housing need (2022 HENA), a shortfall of -792 affordable dwellings has arisen in the first year of the 2022 HENA period between 2021/22 and 2030/31.
- xiv. This is a very worrying and increasing shortfall with hundreds of households not having their needs met.

Affordability Indicators

- xv. The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Charnwood Borough for any household seeking an affordable home:

Housing Register

- The Council's Freedom of Information response confirms that as at 31st March 2022 there were 1,174 households on the Housing Register. This represents a 11% increase in a single year from 1,058 households at 31 March 2021.

Housing Register Bids and Lettings

- Between 1 April 2021 to 31 March 2022 there were an average of 37 bids per 1-bed affordable dwelling put up for let in the parish, 23 average bids per 2-bed affordable dwelling and 19 average bids per 3-bed affordable dwelling. No 4+ bed affordable dwellings were let over the period in Queniborough Civil Parish.
- This should be viewed in context of the fact that the FOI response also highlights that over the 2020/21 monitoring period there were just 18 social housing letting in

Queniborough Civil Parish decreasing by 63% to just 7 lettings over the 2021/22 monitoring period.

Temporary Accommodation

- The FOI response details that 133 households were housed in temporary accommodation within the Charnwood Borough region at 31 March 2022.

Private Rental Market

- Median private rents in Charnwood Borough stood at £595 per calendar month (“pcm”) in 2021/22. This represents a 20% increase from 2013/14 where median private rents stood at £495 pcm. A median private rent of £595 pcm in 2021/22 is comparable to the East Midlands region figure of £650 pcm.
- The average lower quartile monthly rent in Charnwood Borough in 2021/22 was £450 pcm. This represents a 15% increase from 2013/14 where average lower quartile monthly rents stood at £390 pcm. A lower quartile rent of £450 pcm in 2021/22 comparable to the East Midlands region figure of £525 pcm.

Median House Prices

- A 2022 median affordability ratio of 7.59 in Charnwood Borough stands above the East Midlands average of 7.45 and just below the national average of 8.28.
- In 2022 median house prices in LSOA ‘Charnwood 015D’ (£330,000) were 18% higher than MSOA ‘Charnwood 015’ (£279,000), 16% higher than Queniborough Ward (£285,025), 38% higher than Charnwood Borough (£240,000), 50% higher than the East Midlands average (£220,000) and 22% higher than the national average (£270,000). There is a particular local affordability problem therefore.

Lower Quartile House Prices

- A 2022 lower quartile affordability ratio of 8.19 in Charnwood Borough stands above the national average 7.37 and the East Midlands average of 7.26.
- In 2022 lower quartile house prices in LSOA ‘Charnwood 015D’ (£279,000) were 23% higher than MSOA ‘Charnwood 015’ (£227,000), 35% higher than Queniborough Ward (£207,250), 47% higher than Charnwood Borough (£190,000), 71% higher than the East Midlands average (£163,000) and 55% higher than the national average (£180,000).

The Future Supply of Affordable Housing

- xvi. The Council's latest Five Year Housing Land Supply statement includes 3,701 dwellings coming forward in the next five years. If we were to generously assume that all of these sites would provide policy compliant levels of affordable housing (40%), this is likely to deliver only 1,480 affordable dwellings, equating to at best 296 per annum between 2022/23 and 2026/27. The projected delivery of 296 affordable dwellings per annum falls significantly short of the 827 affordable dwellings per annum required by the 2022 HENA. It is important to note that this figure falls substantially short of the 985 per annum figure required when back-log needs are addressed in the next five years in line with the Sedgefield approach.

Conclusion

- xvii. In light of the key findings of my evidence and the acute need for affordable housing within Charnwood Borough and within Queniborough, I consider that **substantial weight** should be attributed to the delivery of up to 60 affordable homes through the appeal scheme in the planning balance.

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by **James Stacey BA (Hons) Dip TP MRTPI** of **Tetlow King Planning** on behalf of **David Wilson Homes**.
- 1.2 The proposed development is for up to 150 dwellings, of which 40% (up to 60 dwellings) are to be provided on-site as affordable housing. This level of provision meets the requirements of Policy CS3 (40%) of the adopted Core Strategy (2015) and exceeds the requirements of emerging Policy H4 which requires 30% affordable housing provision.
- 1.3 The proposed tenure split will be agreed as part of the Reserved Matters application. The proposed affordable housing, along with a scheme to agree the tenure split, will be secured by way of a Section 106 planning obligation.
- 1.4 The site sits entirely within Queniborough Civil Parish, Queniborough Ward, MSOA 'Charnwood 015' and LSOA 'Charnwood 015D'. Population estimates for 2020¹ indicate that within Queniborough Ward there 4,535 residents. A map of the Parish, Ward, MSOA and LSOA areas as well the Charnwood Borough Council area is contained at **Appendix JS1**.
- 1.5 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision² considering evidence of need in the area. It should be read alongside the planning evidence of Angela Brookes.
- 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").

¹ Derived from the Office for National Statistics - Population estimates - small area based by single year of age - England and Wales data.

² For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

- I have over 28 years' professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and have been in private practice since 2001.
- During my career, I have presented evidence at more than 110 Section 78 appeal inquiries and hearings. I act for a cross-section of clients and advise upon a diverse range of planning and 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 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government.

1.9 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 (**CD6.36**).

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, upon which I rely, from the Council through a Freedom of Information ("FOI") request submitted to Charnwood Borough Council on 6 February 2023. A partial response was received on 24 February 2023 and a full response was received on 9 May 2023. The full FOI correspondence is attached at **Appendix JS2**.

1.12 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

Section 2

- 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").
- 2.2 It has been reflected in a number of court cases including *Mitchell v Secretary of State for the Environment and Another*, (1995) 69 P&CR 60; *ECC Construction Limited v Secretary for the Environment and Carrick District Council*, (1995) 69 P&CR 51; *R v Tower of Hamlets London District Council, ex parte Barratt Homes Ltd* [2000] JPL 1050.

National Planning Policy Framework (20 July 2021)

- 2.3 The revised NPPF was last updated on 20 July 2021 and is, of course, a key material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 2.4 The document sets a strong emphasis on the delivery of sustainable development, an element of which is the social objective... 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*" (paragraph 8).
- 2.5 Chapter 5 / paragraph 60 of the revised NPPF confirms the Government's objective of "*significantly boosting the supply of homes*".
- 2.6 The revised NPPF is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include "*those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*" (paragraph 62).
- 2.7 The national guidance places a "corner-stone" responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. In

particular, paragraph 65 establishes that “*Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership*”.

- 2.8 Affordable housing is defined within the revised NPPF’s glossary as: affordable housing for rent (in accordance with the Government’s rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents), starter homes, discounted market sales housing (at least 20% below local market value) and 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).

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.9 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 JS3** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary

- 2.10 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority; it is a fundamental element in the drive to address and resolve the national housing crisis.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

- 3.1 The National Housing Strategy³ 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 almost a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Charnwood Borough.
- 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 (**CD6.34**). 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 Member 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*”.
- 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 Laying the Foundations: A Housing Strategy for England (November 2011)

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 there are “a lot of statistics to prove it” my evidence in subsequent sections sets of an array of statistics, which I consider demonstrates the crisis remains as prominent now as it did in 2013.

Consequences of Failing to Meet Affordable Housing Need

3.9 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.

3.10 In August 2019 the Children’s Commissioner produced a report titled “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*”. (CD6.30) to investigate impact of homelessness and in particular the effect of this upon children.

3.11 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 reforms⁴.

3.12 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.

⁴ 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.

- 3.13 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”*.
- 3.14 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and no choice but to move out of their local area, which can have a *“deeply disruptive impact on family life”*. This can include lack of support (from grandparents for example) and travel costs.
- 3.15 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.
- 3.16 Temporary accommodation also presents serious risks to children’s health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 3.17 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”*.
- 3.18 More recently in May 2021, Shelter published its report *“Denied the Right to a Safe Home – Exposing the Housing Emergency”* (CD.6.31) 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).
- 3.19 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)

3.20 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).

3.21 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).

3.22 In April 2022 Shelter published a further report titled *“Unlocking Social Housing: How to fix the rules that are holds back building” (CD6.38)*. 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.”

3.23 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.

3.24 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).

3.25 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.”

- 3.26 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.”*
- 3.27 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.”*
- 3.28 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).
- 3.29 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.”*
- 3.30 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.”*
- 3.31 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).

- 3.32 It is also pertinent to highlight that Charnwood Borough Council themselves recognise the consequences of failing to meet affordable housing needs.
- 3.33 Page 20 of the Homelessness and Rough Sleeping Reduction Strategy 2019-2022 sets out a number of challenges facing Charnwood Borough Council. It states that:

“Council housing stock levels within Charnwood are decreasing due to Right to Buy sales. With reduced funding for new affordable housing, it will be more difficult to meet the housing needs of households who are unable to access Home Ownership or the Private Rented Sector.”

The Cost of Living Crisis

- 3.34 On 21 November 2022, the House of Commons published its ‘Rising Cost of living in the UK’ briefing report (**CD6.33**) which highlights that the annual rate of inflation reached 11.1% in October 2022, a 41-year high, affecting the affordability of goods and services for households.
- 3.35 The briefing report details at Section 5.1 that:

“91% of adults in Great Britain reported an increase in their cost of living in October-November 2022 since the same period in 2021”. Moreover, Section 5.1 further specifies that “65% of those who reported a rise in the cost of living between 26 October - 6 November 2022 say they are spending less on non-essentials as a result, while 63% report using less energy at home and 44% report cutting back on essentials like food shopping. 2% were being supported by a charity, including food banks.” (My emphasis).

- 3.36 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits. Shelter published a briefing report in September 2022 titled ‘Briefing: Cost of Living Crisis and the Housing Emergency’ (**CD6.37**) 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).

3.37 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”*.

Conclusions

3.38 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.

3.39 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.

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

3.41 The acute level of affordable housing need in Charnwood Borough coupled with worsening affordability will detrimentally affect the ability of people to lead the best

lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for Charnwood Council comprises of the Charnwood Core Strategy (2015) and Charnwood Local Plan (2004) Saved Policies. The Queniborough Neighbourhood Plan 2019-2028 (2021) is also relevant to the appeal site and forms part of the Development Plan for this area.
- 4.3 Other material considerations include the National Planning Policy Framework (2021), the Planning Practice Guidance (March 2014, Ongoing Updates), the emerging Charnwood Local Plan 2021-37, Charnwood Housing Supplementary Planning Document (2017) as well as several corporate documents.

The Development Plan

Charnwood Local Plan Core Strategy 2011 to 2028 (2015) – CD5.03

- 4.4 Charnwood Local Plan was adopted in November 2015 and covers the 17-year period from 2011 to 2028. The Plan sets out how the Council thought new development should have taken place up until 2028. It goes without saying that it is long overdue a review.
- 4.5 Page 14 and 15 sets out a Vision for Charnwood, part of this vision states:

“Our community will have access to homes to suit their needs. In particular, there will be a good provision of affordable housing particularly in rural communities. Issues previously associated with houses in multiple occupation will have been managed and social cohesion will have improved.”

- 4.6 Pages 16 and 17 go on to set out a series of strategic objectives, strategic objective SO17 states:

“SO17: to meet needs for homes, including affordable housing in line with the requirements of the Leicester and Leicestershire Housing Market Area.”

4.7 Pages 30 to 32 sets out **Policy CS1 (Development Strategy)**. In relation to meeting the local social and economic need for the settlement of Queniborough, Policy CS 1 seeks to do this by *“responding positively to affordable housing developments in accordance with Policy CS3”*.

4.8 Chapter 5 deals with meeting the housing needs of the authority, with page 34 setting out the context of affordable housing across Charnwood. Paragraphs 5.9 to 5.11 on page 35 states:

“The price of a home has increased significantly over the past 10 years and remains out of reach for many people despite the recent economic climate.

The average house price in Charnwood was £189,635 in 2011. The price of the cheapest properties, which are likely to be attractive to first time buyers, was £127,000. The household income required to purchase an entry level home is £38,100 based on a 90% mortgage, although many mortgages require a larger than 10% deposit. Whilst a larger deposit makes it easy for a homebuyer to support a mortgage on a lower salary, it presents a different challenge of saving a large enough deposit and the increased time needed for this.

The generally accepted ratio for the amount of mortgage a household can borrow is 3 to 3.5 times household income. The average household income in Charnwood was £33,629 in 2011. Average house prices have reached over 5.5 times average household income in Charnwood. However, many people earn less than this, and in fact even the cheapest homes are 6.6 times the household income of buyers on lower incomes”.

4.9 Paragraph 5.13 on page 37 goes on to set out the shortage of affordable housing across the borough:

“However, our evidence suggests that there are not enough affordable homes to meet the needs of our community. Between 2011 and 2031 the estimated number of affordable homes required to address outstanding and newly arising needs is 180 houses a year. The lack of affordable homes can result in people being unable to downsize or move out from living with their parents. For those who do move they may not live near their work and may have to leave their home town or village.”

4.10 Whilst paragraph 5.14 on page 37 goes on to state the Council’s intention *“to increase the amount of affordable homes being delivered.”*

- 4.11 Paragraph 5.17 on page 37 sets out the required size and type of affordable housing to be provided:

“Our evidence shows that the greatest need for affordable homes is generally for 2 and 3 bed houses. In terms of tenure, our evidence suggests that 20% of affordable homes should be provided for intermediate housing and the remaining 80% should generally be split equally for social or affordable rent.”

- 4.12 Paragraph 5.18 on page 37 sets out the Council’s affordable housing delivery target:

“The size and type of affordable housing on new housing developments should reflect our needs as identified by the Strategic Housing Market Assessment and the requirements of the local area. We have considered how many affordable homes we may be able to deliver and have set an ambitious but realistic target of 3,060 new affordable homes to be delivered with our partners in Charnwood between 2011 and 2028”.

- 4.13 **Policy CS3 (Strategic Housing Needs)** is the main affordable housing policy. Pages 38 and 39 set out the affordable housing requirements by location. For sites within Queniborough, Policy CS3 sets a target of 40% affordable housing delivery on sites delivering 5 or more dwellings.

- 4.14 Appendix 3 sets out the monitoring framework for Charnwood. The monitoring Framework for Policy CS3 Strategic Housing Needs sets out the following affordable housing delivery target:

- 700 by April 2016
- 1,900 by April 2021
- 2,700 by April 2026
- 3,060 by April 2028

- 4.15 My analysis at Section 6 shows that 633 affordable dwellings (net of RtB) were delivered by 2016; and 1,462 affordable dwellings (net of RtB) were delivered by 2021.

Queniborough Neighbourhood Plan 2019-2028 – CD5.06

- 4.16 The Queniborough Neighbourhood Plan was made in June 2021 and covers the 9-year period between 2019 and 2028.

4.17 Chapter 7 of the Plan deals with Housing, paragraph 7.26 on pages 44 and 45 sets out the appropriate mix of housing across both market and affordable sectors: Paragraph 7.27 on page 45 goes on to explain a list of considerations that new housing needs to take account of relevant considerations include:

- *“House prices are high.*

The average house value in Queniborough was £309,846 compared with £222,704 in Syston and £206,369 in East Goscote (Zoopla Zed-Index)

- *The greatest local need is for 2 or 3 bed homes.*

129 respondents to our 2019 Questionnaire Survey indicated that they would be looking for alternative housing within Queniborough over the next 10 years. 53% wanted a 2bed home, 34% a 3bed home.

- *Local people would like to see a mix of housing types and sizes.*

49% of respondents to our 2019 Questionnaire Survey have said they think bungalows of 1 or 2 bedrooms & starter homes of 2 bedrooms are needed the most.”

4.18 Page 46 sets out **Policy Q12 (Housing Mix)** which states:

“Applicants for the development of a rural exception site or five or more new dwellings will need to demonstrate how their proposals will meet the housing needs of older households and/or the need for smaller, low-cost homes for sale including as part of any affordable housing element.”

4.19 Paragraph 7.31 on pages 46 and 47 sets out a definition of affordable housing:

“Affordable housing is 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). Affordable housing can include affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership.”

4.20 Furthermore, paragraphs 7.32 and 7.33 on page 47 sets out the delivery of affordable housing across Queniborough:

“Our 2019 Questionnaire Survey also included questions on housing need. The results identify a need for local housing, but this need can largely be met by market housing.

70 of the 176 dwellings on Davidsons' Barley Fields site are to be affordable. While people with a connection to Queniborough Parish are not prioritised, there are opportunities for local people to access affordable homes for rent or shared-ownership."

- 4.21 Paragraph 7.34 on page 47 explains that *"If there were to be a proven local need for additional affordable homes in the future, Core Strategy Policy CS3 makes provision to allow planning permission to be granted for affordable housing on 'Rural Exception Sites', i.e., sites that would not normally be released for private market housing."*

Charnwood Local Plan (2004) Saved Policies – CD5.01

- 4.22 The Charnwood Local Plan (2004) was adopted in 2004 and covered the 15-year period of 1991 to 2006. In 2007 the Secretary of State saved a number of its policies, many of these have since been superseded by the Charnwood Local Plan Core Strategy, none of the remaining saved policies relate to the delivery of affordable housing.

Other Material Considerations

Emerging Charnwood Local Plan 2021-2037 – CD5.04

- 4.23 The Charnwood Local Plan 2021-37 has been submitted to the Secretary of State and is currently under examination. The Plan sets out the Council's vision for development across the 16-year period from 2021 to 2037.

- 4.24 Pages 13 and 14 sets out a vision for Charnwood, part of this vision states:

"Our communities will have access to homes to suit their needs. There will be provision of affordable housing including in rural communities. Issues previously associated with houses in multiple occupation will have been managed and social cohesion will have improved."

- 4.25 Page 15 goes on to set out a number of objectives, under the theme of "Society: Supporting strong, vibrant, and healthy communities", Objective 1 states:

"To provide our communities with access to homes to suit their needs and providing affordable homes, including for rural communities."

- 4.26 Paragraph 2.10 on page 19 discusses the need for affordable housing in Charnwood:

"In addition, we have considered whether our Local Housing Need figure needs to be adjusted to take account of the delivery of affordable housing. Our evidence shows that provision of new affordable housing is an important and

pressing issue in the Borough. It does not however conclude that there is a need to consider a housing requirement greater than our Local Housing Need figure in order to enable the delivery of more affordable housing. This is because some of the affordable housing need is already counted in the Local Housing Need figure as this measures the total number of new households that will form, including those in need of affordable housing. Identifying this group again in our housing need evidence does not therefore demonstrate an additional overall need for housing above that identified. In addition, many households with a need for affordable housing will already be living in housing and so providing an affordable housing option will release another home meaning there is no overall net increase in the need.”

4.27 Paragraph 4.2 on page 133 states the Council’s priority in relation to housing needs:

“Our priority is that over the plan period enough homes are built to meet our identified housing needs and that their size, tenure, adaptability and type also meet people’s needs.”

4.28 Table 6 on page 133 goes on to set out the ‘Preferred Overall Mix of New Housing by Size and Tenure’, this is set out below:

Preferred Overall Mix of New Housing by Size and Tenure				
	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	Up to 10%	20-30%	45-55%	15-25%
Affordable home ownership	10-20%	35-45%	30-40%	15-25%
Affordable housing (rented)	60-75%		20-30%	Up to 10%

4.29 Furthermore, paragraph 4.7 on page 133 explains what affordable housing types and tenures the Council will seek to avoid:

“It is also important to consider the types of affordable homes to ensure what is provided best meets the needs of households and ensures a Registered Provider can be successfully secured to manage the homes. On this basis we will generally seek to avoid the following:

- *rented affordable flats for families with children;*
- *large numbers of one bedroom rented affordable flats on an individual site;*
- *one-bedroom intermediate affordable homes; and*
- *intermediate affordable flats.”*

- 4.30 Policy H1 ‘Housing Mix’ on page 135 sets out the Council’s approach to providing for the housing needs of the authority area:

“We will seek a mix of house types, tenures and sizes that meet the overall needs of the Borough in line with our most up to date evidence. We will do this whilst having regard to the extent to which those needs have already been met by other development, local housing needs and housing market evidence, economic conditions, viability and site-specific circumstances.”

- 4.31 Paragraph 4.21 and 4.22 on page 137 acknowledge the affordability challenge in the authority, stating:

“The difference between house prices and household incomes makes it difficult for some people to afford to buy a home. Market rent levels can also be unaffordable for some people who are unable to or do not wish to purchase their home.

Evidence from the Land Registry shows that house prices in Charnwood have increased significantly over the last decade and have done so by more than the regional and national average. Household earnings have not kept pace with this increase in house prices. The generally accepted ratio for the amount of mortgage a household can borrow is 3 to 3.5 times household income and in Charnwood average house prices are over 7 times average earnings.”

- 4.32 Paragraph 4.25 on page 137 states “an identified need for 476 new affordable homes for rent (category a) a year in Charnwood over the plan period to meet existing and newly arising needs.”

- 4.33 Paragraph 4.25 on pages 37 and 38 discusses the tenure of Affordable homes for rent that is required:

“The majority of that need is for homes where rent is charged at the social rent level, which is less expensive than the affordable rent level. It is recognised that there is also a role for affordable rents and our evidence suggests that a significant proportion of the need for affordable homes for rent could be met by either affordable rent or social rent when access to housing benefits and the local housing allowance cap sought on affordable are taken into account. It is clear from our evidence that both tenures of homes are likely to be required in all areas of the Borough.”

- 4.34 Paragraph 4.27 on page 138 discusses First Homes and states that in line with national policy the Council “will require at least 25% of all affordable homes delivered through developer contributions to be First Homes.”
- 4.35 Furthermore, paragraph 4.28 on page 137 goes on to state that “that shared ownership is the most appropriate form of affordable home ownership to meet the needs of those most in need in the Borough due to the lower deposit requirements and lower overall costs. Once the First Homes requirement has been met, this will be the preferred affordable home ownership tenure”.
- 4.36 **Policy H4: Affordable Housing** on pages 139 and 140 sets out the Council’s affordable housing policy, Policy H4 explains that the Council “will seek 30% affordable housing from all major housing developments with the exception of brownfield sites where 10% affordable housing will be sought.”
- 4.37 Policy H4 goes on to set out the required tenure mix:

	Total Affordable	% of Affordable Homes for Rent	% of Affordable Homes for Ownership
Greenfield	30%	67%	33%
Brownfield	10%	50%	50%

- 4.38 Page 209 sets out how Policy H4 will be monitored:

Indicators	Target
H4 - Affordable Housing	
Number and percentage of new affordable homes completed.	30% on greenfield sites and 10% on brownfield sites
Amount of developer financial contributions secured for affordable housing (commuted sums)	No target

Supplementary Planning Document

Charnwood Housing Supplementary Planning Document (2017) – CD5.11

- 4.39 The Charnwood Housing Supplementary Planning Document (“SPD”) was adopted in May 2017 and further updated in December 2017. The Housing SPD provides further guidance on the housing policies contained within the Charnwood Local Plan (2015).
- 4.40 The foreword to the SPD on page 1, written by Councillor Eric Vardy states:

“One of the key policies in the Local Plan aims to meet housing needs in the Borough by seeking affordable housing and an “appropriate mix of types,

tenures and sizes of homes, having regard to identified needs and the character of the area". By seeking an appropriate mix of housing, the Council will act positively to try and ensure that the new houses that are being provided in the Borough are those that best meet the changing needs of the population."

4.41 Chapter 2 addresses affordable housing. Paragraph 2.1 on page 5 explains:

"The difference between average house prices/rents and household incomes makes it difficult for some people to find a home. We can help people in our community whose needs are not met by the open market by providing access to affordable housing as defined in the National Planning Policy Framework. Affordable housing is usually provided by registered providers such as the Council or a Housing Association and it is only available to those unable to afford to purchase or rent a home privately. The definition of affordable housing for the purposes of planning does not relate to price of a home but to the type or tenure of a home."

4.42 Paragraph 2.9 on pages 6 and 7 clarifies that following revisions to national policy, *"affordable homes will only be sought on sites of 11 dwellings or more in all areas whilst the National Planning Practice Guidance on this matter is in place."*

4.43 Paragraph 2.13 on page 8 explains that *"The Leicester and Leicestershire Housing and Employment Development Needs Assessment (2017) found that 77% of the affordable housing need identified was for rented properties and 23% for intermediate housing. The assessment found that homes for social and affordable rent are likely to meet the needs of the same group of households and therefore they are grouped together."*

4.44 Paragraph 2.15 on page 8 goes on to discuss the provision of intermediate homes, stating:

"In relation to intermediate homes, the registered providers active in the Borough have a preference for shared ownership homes. These products generally have clear criteria for eligibility and are recognised by high street lenders. Where applicants wish to propose an alternative intermediate housing product we will consider this against the definition set out in the NPPF and consider how the product proposed meets identified need now and in the future"

- 4.45 SPD guidance at HSPD 2 ‘Tenure Mix of Affordable Housing’ on page 7 offers further details on the expected tenure mix of affordable housing, this includes a tenure split of Social or Affordable Rent of 77% and an Intermediate (Shared Ownership) provision of 23%. HSPD2 goes on to explain:

We will continue to work collaboratively with registered providers and housebuilders to consider alternative mixes where there is a clear justification. In considering alternative mixes the Council will balance the need to meet the objectively assessed needs of our community with the need for flexibility to avoid delays to the delivery of housing.”

- 4.46 Further SPD guidance at HSPD3 ‘Affordable Housing Cascade’ on page 9 sets out the council’s approach to the cascade of affordable housing in S106 agreements:

“Where appropriate, Section 106 agreements should include an affordable housing cascade that will be triggered where an applicant demonstrates that they have done everything they reasonably can to secure either a registered provider or the local housing authority to purchase the affordable homes but have been unsuccessful.

In these circumstances the cascade will allow the applicant to continue to deliver market homes beyond agreed caps related to the provision of affordable housing whilst the following options are considered in turn:

- *the applicant and Council to agree as a first solution an alternative tenure mix or reduction in units to make the package more attractive to a registered provider or the local housing authority.*
- *If the alternative package does not successfully attract a registered provider (or the local housing authority) then the cascade will provide a mechanism for the following options to be considered:*
 - *the gifting of a reasonable proportion of the units to the Council; or*
 - *the provision of a commuted sum to the Council.*

As a last resort the cascade will provide a mechanism for the affordable units to be sold on the open market to a person in housing need at 60% of their open market value with legal safeguards attached ensuring that the discount remains in perpetuity.”

4.47 Chapter 3 offers further guidance on housing mix, paragraph 3.9 on page 16 explains:

“We will seek to ensure affordable homes are designed to accommodate the following number of people to reflect how homes will be allocated to those on the housing register:

- *“1 bed affordable rented homes need to accommodate 2 people;*
- *2 bed affordable rented homes need to accommodate 4 people;*
- *3 bed affordable rented homes need to accommodate minimum of 5 people;*
and
- *4 bed affordable rented homes need to accommodate minimum of 7 people.”*

4.48 Paragraph 3.9 goes on to set out the types of affordable homes that the Council seek to avoid:

“It is also important to consider the types of affordable homes to ensure what is provided best meet the needs of the community and ensures a registered provider can be successfully secured to manage the homes. On this basis we will generally seek to avoid the following:

- *rented affordable flats for families;*
- *large numbers of one bedroom rented affordable flats on an individual site;*
- *one bedroom intermediate affordable homes; and*
- *intermediate affordable flats.”*

Corporate Documents

Charnwood Housing Strategy 2015-2020 – CD6.35

4.49 Charnwood Housing Strategy covers the 5-year period of 2015-2020 its sets out how the Council intends on dealing with the housing issues facing the authority.

4.50 Page 3 of the Strategy sets out the Council’s long-term vision:

“The vision sets out that our place to live...will have world class design, where new developments reflect the wishes of the community, and are built to reflect their surroundings, protect our heritage, and take advantage of our natural beauty. We will have specific developments for our ageing population, where they can be cared for when needed, but able to live full and active lives into older age. Families will live in good quality homes, many of which will be low

cost and inclusive, supported by a range of facilities to enjoy all that Charnwood has to offer, to take full advantage of our unique location. Our neighbourhoods will be attractive to city workers who want to live in a friendly community, with plenty of open spaces, but be able to travel easily to work on efficient roads and railways, that make facilities and services accessible to all.”

4.51 Page 3 goes on to state how the Council will support the vision and sets out how it will achieve these priorities:

“We will support this vision through our Housing Strategy by: -

- *Increasing the supply of suitable housing.*
- *Reducing the barriers to housing.*
- *Prioritising our services to enable people to remain in their homes.*

To achieve these priorities, we will focus on

- *Delivery of New Housing*
- *Making best use of existing stock*
- *Improving advice and support*

Furthermore, the strategy identifies two key offers the strategy can deliver:

*Our **Offer to Health-** to maximise the contribution that housing can make to the health and wellbeing of the borough.*

*Our **Offer to the Private Rented Sector-** to improve standards and to reduce barriers to access in order to make this tenure one of choice.”*

4.52 Page 4 discusses increasing the supply of suitable housing, it explains:

“Increasing the supply of suitable housing is not simply concerned with the delivery of new affordable housing although that does indeed play an important part. Equally important are initiatives that ensure existing housing is more suitable for those who need it.”

4.53 Page 4 goes on to state the findings of the 2014 SHMA and sets out the affordable housing needs of Charnwood:

“It goes on to break down the overall need into a need for 4,350 new affordable homes over the same period and this equates to 174 per year, of which 21.2% should be Low Cost Home Ownership such as Shared Ownership or Equity Share.

This affordable housing need equates to 21.5% of all the new housing planned for over the period.”

4.54 Page 5 also explains that *“To meet the overall strategic need of the borough we therefore need to be mindful not just of the size of affordable housing being delivered, but also the market units. A repeated theme in the consultation responses for the strategy has been the need to ensure that market as well as affordable housing meets local demand.”*

4.55 Page 6 sets out the Council’s past affordable housing delivery between 2009/10 and 2013/14, this highlights that 162.8 affordable dwellings have been delivered in Charnwood per annum⁵.

4.56 Page 7 of the Strategy states the council desired affordable housing mix:

- *“The need to increase the supply of 2 bedroom houses as our highest priority.*
- *The need to ensure a pipeline of 2 bedroom bungalows through a combination of traditional single storey and dormer type.*
- *The fact that 70% of one bedroom need comes from older people and so we shall seek for around 2/3 of one bed units to be accessible as either bungalows or ground floor flats.”*

4.57 Page 8 goes on to explain that the Council will *“continue to monitor evidence of the required split between rented and low cost home ownership products although for the last 6 years this has remained at around 80/20 in favour of rented.”*

4.58 Page 8 continues, explaining the provision of affordable housing in rural settlements:

“The delivery of section 106 sites is intended to meet the needs of the borough as a whole, however when development takes place in small rural settlements, we will consider both reflecting any identified local need as part of the affordable housing mix and applying a degree of local preference to the allocation of the homes to the extent of meeting that need.”

4.59 Furthermore, page 8 discusses affordable and social rent:

“We recognise the role that both affordable and social rent can make towards meeting housing need and therefore we will consider either tenure (or a combination of both) within the rented units. However, units delivered as affordable rent need to be accepted into the Homes and Communities Agency

⁵ Please see Section, Figure 6.2 for up to date delivery figures.

(HCA) programme and so it is the responsibility of the developer to identify a suitable Registered Provider (RP) and to confirm the necessary standards with them if they wish the units to be let at affordable rents.”

**Charnwood Homelessness and Rough Sleeping Reduction Strategy 2019-2022
– CD6.32**

4.60 The Charnwood Homelessness and Rough Sleeping Reduction Strategy 2019-2022 covers the three year period of 2019 to 2022. The Strategy sets out the Council’s approach for tackling homelessness and rough sleeping across Charnwood.

4.61 The Foreword to the Strategy on page 2 written by Councillor Paul Mercer, Lead Member for Housing sets out 6 key objectives of the Strategy:

1. *“Strong and effective partnership working.*
2. *Early targeted advice and intervention to prevent the loss of accommodation.*
3. *Effective action to relieve homelessness.*
4. *Support for rough sleepers.*
5. *Support to sustain tenancies and prevent repeat homelessness.*
6. *Protect and increase local housing options.”*

4.62 Page 5 of the Strategy explains that *“Since 2016-2017, the Council has utilised receipts from Right to Buy sales to acquire 21 properties to increase the Council’s social housing stock.”*

4.63 Page 7 sets out the local context of Homelessness in Charnwood stating:

“609 homeless applications were made to Charnwood Borough Council’s Housing Options Team during 2018-2019 following the implementation of the Homelessness Reduction Act. 45% of these applications were from individuals who were at risk of becoming homeless and 55% were from individuals who were already homeless”.

4.64 Page 8 sets out the main reasons for homelessness during 2018-2019:

“The main reasons for homelessness during 2018-2019 were nonviolent breakdown of relationship with family (20%), loss of Assured Shorthold Tenancy due to the landlord wishing to sell or re-let the property (15%), domestic abuse (14%) and non-violent breakdown of relationship with partner (10%).”

- 4.65 Page 10 sets out how many households were held in temporary accommodation in 2018-2019:

“The number of households who were being temporarily accommodated by Charnwood Borough Council on the last day of each quarter during 2018-2019 increased in every quarter up until the 31st March 2019, when the number decreased slightly. However, the number of households being temporarily accommodated on the 31st March 2019 (63 households) was 43% higher than on the 31st March 2018 (44 households). The majority of these households were being temporarily accommodated within self-contained properties within the Council’s own housing stock.

The number of households who were being temporarily accommodated in Bed and Breakfast increased up until 31st March 2019, when the number decreased slightly. However, the number of households in Bed and Breakfast on the 31st March 2019 (5 households) was 67% higher than on the 31st March 2018 (3 households).”

- 4.66 Furthermore, page 10 also discusses social housing:

“On the 31st March 2019, the Council had a total of 5,571 social rented properties and multiple Registered Providers collectively had 3,037 affordable rental properties within Charnwood. Due to Right to Buy sales, the Council’s housing stock has reduced in every year since 2015-2016 (5,700 properties) to 2018-2019 (5,571 properties).”

- 4.67 Page 11 goes on to discuss right to buy receipts and the housing register, it explains:

“The Council used receipts from Right to Buy sales to purchase 11 properties during 2018-2019. In addition, the Council negotiated 27 gifted units from property developers during 2018-2019. The number of active applications on the Council’s Housing Register on the 31st March increased each year from 2015- 2016 (2,029 households) to 2018-2019 (2,816 households).

The Council introduced a new Housing Allocations Policy on the 1st April 2019. Applicants who do not have a confirmed Housing Need no longer qualify for the Council’s Housing Register.”

- 4.68 Page 11 also sets out the private rented sector, it states:

“The number of homeless households who were successfully assisted to secure accommodation in the private sector during 2018-2019 (50) was low in

comparison to the number of homeless applicants who became homeless/at risk of homelessness from accommodation in the Private Sector (231 households) during 2018/19.

The Council introduced a Social Lettings Service (CBC Lettings) in Charnwood in 2018-2019 and expanded the service across Leicestershire County and Rutland County in 2019-2020. The primary aim of this service is to increase access to suitable affordable private rental accommodation for homeless and vulnerably housed households.”

4.69 Page 12 explains that *“Levels of demand for the limited amounts of Social Housing within Charnwood are increasing. Council housing stock levels continue to decrease due to Right to Buy sales.”*

4.70 Page 13 sets out 6 strategic objectives of the Strategy, relevant objectives are set out below:

“3. Effective action to relieve homelessness.

Strong and effective pathways ensure that suitable accommodation can be secured as soon as possible.

Suitable local temporary accommodation can minimise the negative effects of homelessness.

“6. Protect and increase local housing options.

Demand for the limited amounts of Social housing and supported accommodation within Charnwood is high and some households have difficulty accessing accommodation in the private rented sector.

The Council aims to work with partners to make the best use of existing resources, improve access to available housing options, increase supply and identify and address gaps in provision.”

4.71 Page 16 discusses Objective 3 ‘Effective action to relieve homelessness’ in detail and sets out a series of challenges and actions, relevant challenges are set out below:

“Low income households often lack the funds or references required to secure accommodation in the Private Rented Sector within Charnwood.

Bed and Breakfast accommodation is not suitable for applicants who are aged 16 and 17 years of age, pregnant women or households containing dependent children. However, there are limited temporary accommodation options within

Charnwood for households who require accommodation in an emergency. As a result, households often need to be accommodated within Bed and Breakfasts that are located outside of the Charnwood area, away from their existing networks.”

4.72 Page 16 also sets out 5 actions in order to address Objective 3, relevant actions include:

- *“Ensure homeless households are assisted to access suitable, affordable long-term housing in the Social Sector or Private Sector.”*
- *“Ensure a sufficient supply of suitable temporary accommodation within Charnwood.”*

4.73 Page 19 sets out Objective 6 ‘Protect and increase local housing options’, relevant challenges include:

“Some Private Sector Landlords and Lettings Agents are reluctant to accept Tenants who are on low incomes or who claim welfare benefits.

Council housing stock levels within Charnwood are decreasing due to Right to Buy sales. With reduced funding for new affordable housing, it will be more difficult to meet the housing needs of households who are unable to access Home Ownership or the Private Rented Sector.”

4.74 In order to address Objective 6 page 19 sets out four actions, these are set out below:

- *“Work with partners to ensure there are sufficient supported accommodation units to meet demand and to meet the needs of groups who are particularly at risk of homelessness in Charnwood.*
- *Increase the supply of affordable Social Housing within Charnwood, particularly accommodation that is let at social rent level.*
- *Make the best use of existing Council housing stock within Charnwood.*
- *Improve access to suitable, affordable housing within the Private Rented Sector within Charnwood for homeless households.”*

Conclusions on the Development Plan and Related Policies

4.75 The Development Plan for Charnwood Borough Council currently comprises of the Charnwood Core Strategy (2015) and Charnwood Local Plan (2004) Saved Policies. The Queniborough Neighbourhood Plan 2019-2028 (2021) also forms part of the

development plan for this area. For many years it has sought to provide policies to deliver housing, especially affordable housing.

- 4.76 As I set out above the commentary purports that the Council has a desire to improve the delivery of affordable housing in Charnwood Borough. However, from my reading of the success (or more appropriately the lack of success) it appears that whilst the Council are saying all the right things, notably within their corporate documents and the Core Strategy (2015), these are simply not being followed through with real actions to help the most vulnerable people in Charnwood Borough.
- 4.77 My Sections 5-7 below clearly demonstrate that the situation is in fact seriously worsening with ever-increasing affordable housing needs, poor affordable housing delivery and increasing numbers of households on the Council's housing register. As such, there is a need to urgently address the needs of those households, desperately seeking assistance with their housing needs.
- 4.78 It is my opinion that the evidence set out in this section 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 issue which urgently needs to be addressed within Charnwood Borough.
- 4.79 The appeal proposals provide an affordable housing contribution which meets requirements of Policy CS3 of the Core Strategy (2015).
- 4.80 The up to 40% (60 units) affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of Charnwood Borough Council, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 6 of my evidence.

Affordable Housing Needs

Section 5

The Development Plan

- 5.1 The supporting text to Policy CS3 of the adopted Core Strategy (2015) states that “*We have considered how many affordable homes we may be able to deliver and have set an ambitious but realistic target of 3,060 new affordable homes to be delivered with our partners in Charnwood between 2011 and 2028.*” As such, the adopted Development Plan sets a target of 180 affordable dwellings per annum.
- 5.2 It is also important to consider the objectively assessed need for affordable housing within the most up-to-date assessment of local housing need.

Affordable Housing Needs Assessments

Leicester and Leicestershire Strategic Housing Market Assessment 2014 – CD5.28

- 5.3 The Strategic Housing Market Assessment (“2014 SHMA”) was published in June 2014 by GL Hearn, covering a 25-year period between 2011 and 2036. The 2014 SHMA forms part of the evidence base for the adopted Core Strategy (2015).
- 5.4 Table 45 (Page 120) outlines that 174 affordable dwellings are needed within Charnwood Borough between 2011 and 2036.

Housing and Economic Development Needs Assessment 2017 – CD5.14

- 5.5 The Housing and Economic Development Needs Assessment (“2017 HEDNA”) was published in January 2017 by GL Hearn. The 2017 HEDNA sets out the objectively assessed need for housing and affordable for each Local Authority in the Leicestershire area, including Charnwood Borough Council, covering a 25-year period between 2011 and 2036.
- 5.6 Table 38 (Page 102) identifies an annualised affordable housing need for 384 affordable dwellings per annum between 2011 and 2036, equivalent to 5,760 over the 25-year period.

Housing Needs Assessment 2020 – CD5.15

- 5.7 The most recent assessment of affordable housing need for the Charnwood Borough Council administrative area is contained within the Charnwood Borough Council Housing Needs Assessment 2020 (“2020 HNA”).
- 5.8 The 2020 HNA was published in September 2020 by JG Consulting and sets out the objectively assessed need for housing and affordable housing in Charnwood Borough. The 2020 HNA covers a 17-year period between 2020 and 2037.
- 5.9 Figure 4.16 (Page 90) sets out that 476 net social/affordable rented dwellings are needed per annum between 2020 and 2037.
- 5.10 Figure 4.22 (Page 97) sets out that -7 net affordable home ownership dwellings are needed per annum between 2020 and 2037 (although this calculation is based upon the overall cost of housing, and paragraph 4.88 at page 98 notes that there are other barriers to home ownership such as deposit requirements and lending restrictions beyond just the cost of housing). As such, this results in an overall need for 469⁶ affordable dwellings per annum.

Housing and Economic Needs Assessment 2022 – CD5.18

- 5.11 The Leicester and Leicestershire Housing and Economic Needs Assessment (“2022 HENA”) was published in April 2022 and Updated in June 2022 by Icenl. The report once again sets out the objectively assessed need for housing and affordable housing in Charnwood Borough. The 2022 HENA covers a 10-year period between 2021 and 2031.
- 5.12 Figure 9.40 (Page 178) sets out that 372 affordable home ownership dwellings and 455 affordable rented dwellings are needed per annum between 2021 and 2031. As such, this equates to an overall need for 827⁷ affordable dwellings per annum. As noted above – this is nearly 5 times the affordable housing need which the Core Strategy professes that it will address, though in fact hasn’t done so.
- 5.13 It is important to highlight that the affordable housing need within Charnwood Borough has dramatically increased with each assessment of affordable housing need, which in part must be as a consequence of persistent under-delivery.

⁶ 476 (social/affordable rented) - 7 (affordable homeownership) = 469 affordable dwellings per annum.

⁷ 372 (affordable home ownership) + 455 (affordable rented) = 827 affordable dwellings per annum.

Affordable Housing Delivery

Section 6

Past Affordable Housing Delivery

6.1 Figure 6.1 illustrates the delivery of affordable housing (“AH”) in Charnwood Borough since the start of the Core Strategy (2015) period in 2011.

Figure 6.1: Gross Additions to Affordable Housing Stock, 2011/12 to 2021/22

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2011/12	697	202	29%
2012/13	503	99	20%
2013/14	602	151	25%
2014/15	723	155	21%
2015/16	831	181	22%
2016/17	943	180	19%
2017/18	1,107	253	23%
2018/19	1,117	189	17%
2019/20	993	199	20%
2020/21	1,116	213	19%
2021/22	792	76	10%
Total	9,424	1,898	20%
Avg. Pa.	857	173	20%

Source: Freedom of Information Response (9 May 2023)

6.2 Between 2011/12 and 21/2022, a total of 9,424 dwellings were delivered in Charnwood Borough, equivalent to 857 per annum. Of these, 1,898 dwellings were affordable tenures, equivalent to 173 per annum. This equates to 20% gross affordable housing delivery.

- 6.3 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 Provider⁸ (“RP”) affordable housing stock.
- 6.4 Figure 6.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy (2015) period in 2011, net of Right to Buy sales. A net loss of 400⁹ affordable dwellings over this period equates to 21% of the gross affordable housing completions of 1,898 affordable dwellings over the 11-year period.

⁸ 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.

⁹ $(415 + 27) - 42 = 400$ dwellings

Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2011/12 to 21/2022

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 + C) - (D + E)</i>	<i>G</i> <i>(F / A) X 100</i>
2011/12	697	202	n/a	4	1	197	28%
2012/13	503	99	n/a	24	0	75	15%
2013/14	602	151	n/a	34	0	117	19%
2014/15	723	155	n/a	39	1	115	16%
2015/16	831	181	n/a	51	1	129	16%
2016/17	943	180	n/a	60	7	113	12%
2017/18	1,107	253	2	36	3	216	20%
2018/19	1,117	189	13	47	3	152	14%
2019/20	993	199	13	44	8	160	16%
2020/21	1,116	213	4	26	2	189	17%
2021/22	792	76	10	50	1	35	4%
Total	9,424	1,898	42	415	27	1,498	16%
Avg. Pa.	857	173	8	38	2	137	16%

Source: Freedom of Information Response (9 May 2023); DLUHC Live Tables 691 and 693; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2015/16 to 2021/22).

- 6.5 Figure 6.2 demonstrates that on average between 2011/12 and 2021/22, the council has added just 137 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 16% of the total average number of net housing completions, against a target of 40%. This figure is likely to fall even further if demolitions to existing stock were to be accounted for.
- 6.6 The above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Charnwood faster than the replacements from acquisitions.
- 6.7 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 (CD6.26). 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” (my emphasis).*
- 6.8 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.
- 6.9 The seriousness of the impact was considered in a Newspaper article in the Independent newspaper in June 2020. The article is attached as **Appendix JS4**. The reporter considered how Council housing sell-off continues as government fails to replace most homes sold under Right to Buy.
- 6.10 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”.*

- 6.11 The articles go 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.”*
- 6.12 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.
- 6.13 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

- 6.14 The supporting text to Policy CS3 of the Core Strategy (2015) states that *“We have considered how many affordable homes we may be able to deliver and have set an ambitious but realistic target of 3,060 new affordable homes to be delivered with our partners in Charnwood between 2011 and 2028.”*
- 6.15 A target of 3,060 affordable dwellings, equates to 180 affordable dwellings per annum¹⁰. Figure 6.3 illustrates net of RtB affordable housing delivery compared to the Policy CS3 target of 180 net affordable dwellings per annum since the start of the Core Strategy (2015) period in 2011/12.

¹⁰ Please note this is a policy target rather than an assessment of affordable housing need and therefore, this figure is much lower than any of the recent assessments of affordable housing need.

Figure 6.3: Net of Right to Buy Additions to Affordable Housing Stock vs Target Identified by Policy CS3, 2011/12 to 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	Core Strategy Policy CS3 target	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2011/12	197	180	+17	+17	109%
2012/13	75	180	-105	-88	42%
2013/14	117	180	-63	-151	65%
2014/15	115	180	-65	-216	66%
2015/16	129	180	-51	-267	72%
2016/17	113	180	-67	-334	63%
2017/18	216	180	+36	-298	120%
2018/19	152	180	-28	-326	85%
2019/20	160	180	-20	-346	89%
2020/21	189	180	+9	-337	105%
2021/22	35	180	-145	-482	19%
Total	1,498	1,980	-482		76%
Avg. Pa.	136	180	-44		76%

Source: Freedom of Information Response (9 May 2023); DLUHC Live Tables 691 and 693; DLUHC Live Table 1008C; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2015/16 to 2021/22); Core Strategy (2015).

- 6.16 Figure 6.3 demonstrates that since the start of the Core Strategy period in 2011/12 affordable housing completions have averaged 137 net affordable dwellings per annum, against a policy target of 180 net affordable dwellings per annum. A shortfall of -482 affordable dwellings has arisen since the start of the Core Strategy period in 2011/12, equivalent to -44 affordable dwellings per annum.
- 6.17 Figure 6.4 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 174 net affordable dwellings per annum between 2011/12 and 2021/22, as set out in the 2014 SHMA.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2014 SHMA, 2011/12 to 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	2014 SHMA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2011/12	197	174	+23	+23	113%
2012/13	75	174	-99	-76	43%
2013/14	117	174	-57	-133	67%
2014/15	115	174	-59	-192	66%
2015/16	129	174	-45	-237	74%
2016/17	113	174	-61	-298	65%
2017/18	216	174	+42	-256	124%
2018/19	152	174	-22	-278	87%
2019/20	160	174	-14	-292	92%
2020/21	189	174	+15	-277	109%
2021/22	35	174	-139	-416	22%
Total	1,498	1,914	-416		78%
Avg. Pa.	137	174	-38		78%

Source: Freedom of Information Response (9 May 2023); DLUHC Live Tables 691 and 693; DLUHC Live Table 1008C; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2015/16 to 2021/22); 2014 SHMA.

- 6.18 Since the start of the 2014 SHMA period in 2011/12 affordable housing completions (net of Right to Buy) have averaged just 137 net affordable dwellings per annum, against a need of 174 net affordable dwellings per annum. A shortfall of -416 affordable dwellings has arisen over the 11-year period, equivalent to an average annual shortfall of -38 affordable dwellings.
- 6.19 As demonstrated by Figure 6.4, the delivery of only 1,498 affordable homes net of Right to Buy over the period means that just 78% of identified affordable housing needs were met. Or put another way 22% households in need of an affordable home were let down by the council's inability to deliver.

6.20 Figure 6.5 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 384 net affordable dwellings per annum between 2011/12 and 2021/22, as set out in the 2017 HEDNA.

Figure 6.5: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2017 HEDNA, 2011/12 to 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	2017 HEDNA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2011/12	197	384	-187	-187	51%
2012/13	75	384	-309	-496	20%
2013/14	117	384	-267	-763	30%
2014/15	115	384	-269	-1,032	30%
2015/16	129	384	-255	1,287	34%
2016/17	113	384	-271	-1,558	29%
2017/18	216	384	-168	-1,726	66%
2018/19	152	384	-232	1,958	40%
2019/20	160	384	-224	-2,182	42%
2020/21	189	384	-195	-2,377	49%
2021/22	35	384	-349	-2,726	10%
Total	1,498	4,224	-2,726		35%
Avg. Pa.	137	384	-248		35%

Source: Freedom of Information Response (9 May 2023); DLUHC Live Tables 691 and 693; DLUHC Live Table 1008C; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2015/16 to 2021/22); 2017 HEDNA.

6.21 Since the start of the 2017 HEDNA period in 2011/12 affordable housing completions (net of Right to Buy) have averaged just 137 net affordable dwellings per annum, against a need of 384 net affordable dwellings per annum. A shortfall of -2,726 affordable dwellings has arisen over the 11-year period, equivalent to an average annual shortfall of -248 affordable dwellings.

6.22 As demonstrated by Figure 6.5, delivery of only 1,498 affordable homes net of Right to Buy over the period means that just 35% of identified affordable housing needs were

met. Put another way 65% households in need of an affordable home were let down by the council's inability to deliver.

- 6.23 Figure 6.6 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 469 net affordable dwellings per annum between 2020/21 and 2021/22, as set out in the 2020 HNA.

Figure 6.6: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2020 HNA, 2020/21 to 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	2020 HNA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	189	469	-280	-280	41%
2021/22	35	469	-434	-714	7%
Total	224	938	-714		24%
Avg. Pa.	112	469	-357		24%

Source: Freedom of Information Response (9 May 2023); DLUHC Live Tables 691 and 693; DLUHC Live Table 1008C; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2015/16 to 2021/22); 2020 HNA.

- 6.24 When comparison is drawn between net of Right to Buy affordable housing delivery and the needs identified in the 2020 HNA, it can be seen in Figure 6.6 that there has been an accumulated shortfall in the delivery of affordable housing of some -714 affordable homes against an identified need for 938 net affordable homes over the same period, equivalent to an annual shortfall of -357 affordable dwellings.
- 6.25 The delivery of only 224 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 council's inability to deliver.
- 6.26 Figure 6.7 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 827 net affordable dwellings per annum in 2021/22, as set out in the 2022 HENA.

Figure 6.7: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2022 HENA, 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	2022 HENA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	35	827	-792	-792	4%
Total	228	938	-792		4%
Avg. Pa.	114	469	-792		4%

Source: Freedom of Information Response (9 May 2023); DLUHC Live Tables 691 and 693; DLUHC Live Table 1008C; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2015/16 to 2021/22); 2022 HENA.

- 6.27 When comparison is drawn between net of Right to Buy affordable housing delivery and the needs identified in the 2022 HENA, it can be seen in Figure 6.7 that there has been an accumulated shortfall in the delivery of affordable housing of some -792 affordable homes against an identified need for 827 net affordable homes in the first year of the 2022 HENA.
- 6.28 The delivery of only 35 affordable homes net of Right to Buy over the period means that just 4% of identified affordable housing needs were met. Put another way 96% households in need of an affordable home were let down by the council's inability to deliver.

Affordable Housing Delivery in Queniborough Civil Parish

- 6.29 Figure 6.8 illustrates the delivery of affordable housing in Parish since the start of the Core Strategy (2015) period in 2011/12.

Figure 6.8: Gross Additions to Affordable Housing Stock in Queniborough Civil Parish, 2011/12 to 2021/22

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2011/12	1	0	0%
2012/13	6	0	0%
2013/14	1	0	0%
2014/15	7	0	0%
2015/16	15	3	20%
2016/17	58	18	31%
2017/18	79	16	20%
2018/19	58	20	34%
2019/20	38	18	47%
2020/21	47	25	53%
2021/22	0	0	n/a
Total	310	100	32%
Avg. Pa.	28	9	32%

Source: Freedom of Information Response (9 May 2023)

6.30 Over the 11-year period between 2011/12 and 2021/22 there have been a total of 310 net overall housing completions and 100 affordable housing completions in Queniborough Civil Parish. Losses existing stock through the RtB are not recorded on a parish basis. The figure given above is therefore a gross figure.

6.31 It should be noted that no affordable dwellings were delivered in Queniborough Civil Parish in 2021/22. This should be viewed in the context that 79 bids were placed by households on the housing register for properties in Queniborough during this same period.

Conclusions on Affordable Housing Delivery

6.32 The above evidence demonstrates that across Charnwood Borough, the delivery of affordable housing has fallen persistently short of meeting identified needs.

- 6.33 In the 11-year period since the start of the Core Strategy (2015) period in 2011/12 net of Right to Buy affordable housing delivery represented just 16% of overall housing delivery, equating to just 137 affordable dwellings per annum.
- 6.34 When comparative analysis is undertaken against either of the assessments of affordable housing need for Charnwood Borough (the 2017 HEDNA, 2020 HNA and 2022 HENA) substantial shortfalls have arisen in the provision of affordable housing.
- 6.35 Against the 2017 HEDNA, a shortfall of -2,726 affordable dwellings has arisen between 2011/12 and 2021/22, equivalent to -248 per annum.
- 6.36 Against the 2020 HNA, a shortfall of -714 affordable dwellings has arisen in the first two years of the period, equivalent to -357 per annum.
- 6.37 Against the most recent assessment of affordable housing need, contained within the 2022 HENA, a shortfall of -792 affordable dwellings has arisen in the first year of the 2022 HENA period.
- 6.38 It is clear that a 'step change' in affordable housing delivery is needed now in Charnwood Borough to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.39 In light of the identified level of need there can be no doubt that the delivery of up to 60 affordable dwellings on the proposed site will make an important contribution to the affordable housing needs of Charnwood Borough Council.

Affordability Indicators

Section 7

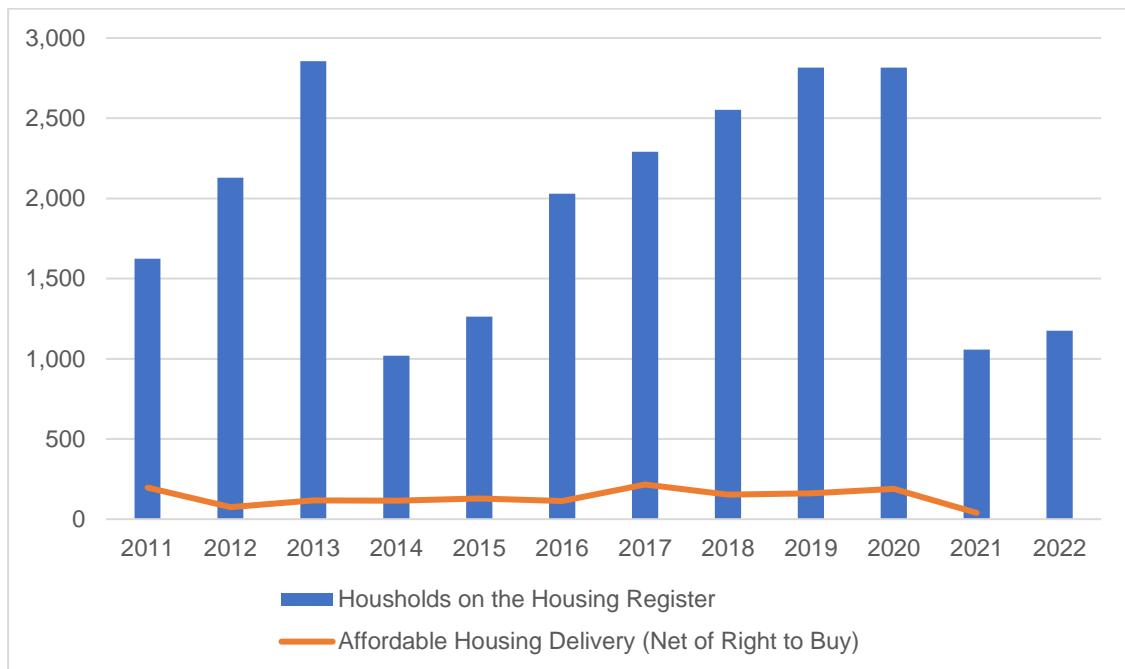
Market Signals

- 7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of plan making.

Housing Register

- 7.2 The Council's Freedom of Information response (**Appendix JS2**) confirms that as at 31st March 2022 there were 1,174 households on the Housing Register. This represents a 11% increase in a single year from 1,058 households at 31 March 2021.
- 7.3 Of the 1,174 households on the Housing Register at 31st March 2022, 146 households specified a preference for an affordable home in Queniborough Civil Parish; this represents 12% of the housing register.
- 7.4 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register and affordable housing delivery (net of Right to Buy) across Charnwood Borough since the start of the Core Strategy (2015) period in 2011.

Figure 7.1: Number of Households on the Housing Register Compared with Affordable Housing Delivery (Net of Right to Buy), 2011 to 2022



Source: Freedom of Information Response (21 March 2023 and 9 May 2023); DLUHC Live Tables 691 and 693; DLUHC Live Tables 600 and 1008C; and Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2015/16 to 2021/22).

Note: completions figures are not yet available for the 2022/23 monitoring period

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 Charnwood Borough since 2011.

7.6 Footnote 4 of DLUHC¹¹ Live Table 600 highlights that:

“The Localism Act 2011, which came into force in 2012, gave local authorities the power to set their own qualification criteria determining who may or may not go onto the housing waiting list. Previously, local authorities were only able to exclude from their waiting list people deemed guilty of serious unacceptable behaviour. The Localism Act changes have contributed to the decrease in the number of households on waiting lists since 2012” (my emphasis).

7.7 Evidently the result of the Localism Act is that many local authorities, including Charnwood Borough Council, have been able to exclude applicants already on

¹¹ Department for Levelling Up, Housing and Communities

Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

7.8 Following the 2012 changes brought about by the Localism Act, in August 2012 Charnwood Borough Council published a revised Housing Allocations Policy which received further revisions in **April 2014, April 2019 and April 2020**.

7.9 The April 2020 Housing Allocations Policy (**Appendix JS2**) outlines the eligibility and qualification criteria for persons seeking to join the housing register. This includes:

- Applicants who do not meet any of the Charnwood Local Connection criteria are not eligible – those who have lived in Charnwood for at least two years, those who have been a resident of Charnwood for 3 of the past 5 years, those who have close adult relatives who are currently residents within Charnwood and have been for 5+ years, and those with paid employment or a confirmed job offer within Charnwood on a permanent basis (at least 12 months) and 16 contracted hours per week;
- Applicants who are homeowners or who have the financial means to purchase a property within Charnwood are not eligible;
- Applicants who have been responsible for serious unacceptable behaviour and are not suitable to be a tenant are not eligible;
- Applicants below the age of 16 years old are not eligible; and
- Applicants who do not have a confirmed “Housing Need” as defined by page 21 of the Housing Allocations Policy are not eligible. Housing Need is categorised into 3 bands with Band 1 being the highest level of need.
 - **Band 3 (Housing Need)** – Overcrowding, disrepair, or other poor housing conditions; median or mobility need; welfare or hardship need; and homeless or at risk of homelessness.
 - **Band 2 (High Housing Need)** – Ready for ‘move on’ which includes those living in supported accommodation but seeking to move into independent housing; management need which includes those who need to move out due to the death of a relative or those currently residing in a disability property which is no longer needed.

- **Band 1 (Emergency Housing Need)** – Dangerous or hazardous housing conditions; emergency median or mobility need; emergency welfare or hardship need; and Homelessness Duty.
- 7.10 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 11% in the past 12-months, indicating a worsening of affordability across Charnwood Borough.
- 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 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 Charnwood Borough 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.
- 7.13 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.
- 7.14 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 (**CD6.19**) 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).*
- 7.15 Furthermore, in the recent appeal decision at Oxford Brookes University Campus at Wheatley, (**CD6.27**) 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” (my emphasis).

7.16 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”.

7.17 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”.

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

7.19 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.

7.20 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, I suggest, the Government intends to assist by increasing the range of affordable housing types in the most recent NPPF.

- 7.21 The Franklands Drive Secretary of State appeal decision in 2006 (**CD6.29**) 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.
- 7.22 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.

Housing Register Bids and Lettings

- 7.23 Figure 7.2 below demonstrates average number of bids per property in Queniborough Civil Parish over the 2021/22 monitoring period for a range of types of affordable property.

Figure 7.2: Bids Per Property in Queniborough Civil Parish, March 2021 to March 2022

Type of affordable property	Average Bids Per Property (1 April 2021 to 31 March 2022)
	Queniborough Civil Parish
1-bed affordable dwelling	37 bids
2-bed affordable dwelling	23 bids
3-bed affordable dwelling	19 bids
4+ bed affordable dwelling	None advertised

Source: Freedom of Information Response (24 February 2023)

- 7.24 Figure 7.2 demonstrates that between 1 April 2021 to 31 March 2022 there were an average of 37 bids per 1-bed affordable dwelling put up for let in the parish, 23 average bids per 2-bed affordable dwelling and 19 average bids per 3-bed affordable dwelling. No 4+ bed affordable dwellings were let over the period in Queniborough Civil Parish.
- 7.25 This should be viewed in context of the fact that the FOI response also highlights that over the 2020/21 monitoring period there were just 18 social housing lettings in Queniborough Civil Parish decreasing by 63% to only 7 lettings over the 2021/22 monitoring period.
- 7.26 For every successful letting, there are clearly tens, if not hundreds of households who have missed out and are left waiting for an affordable home. Evidently there is a clear and pressing need for affordable homes within the ward this is not being met.

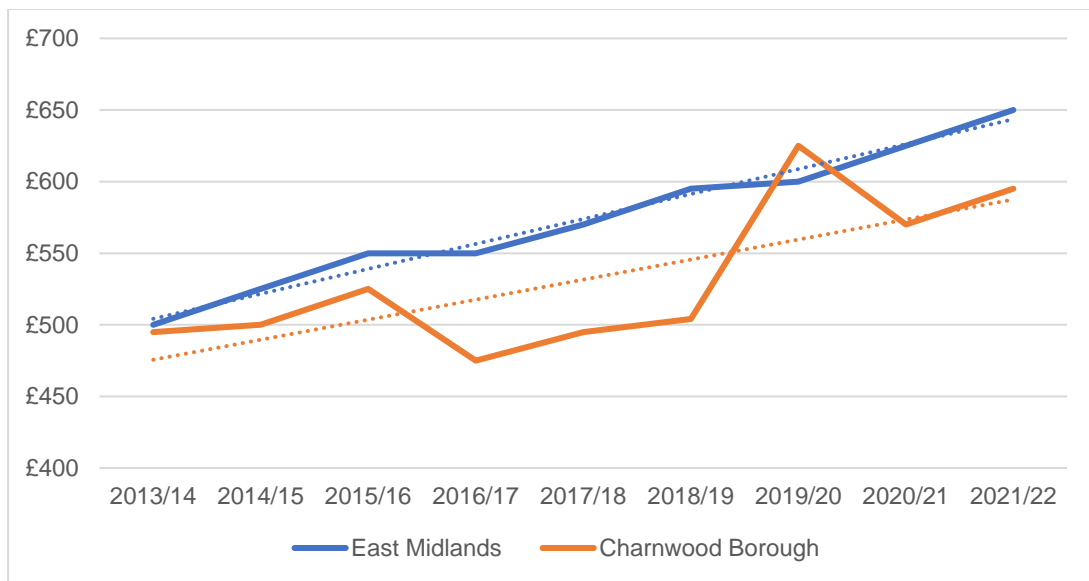
Temporary Accommodation

- 7.27 The FOI response details that 133 households were housed in temporary accommodation within the Charnwood Borough region at 31 March 2022. Charnwood Borough Council has a responsibility to house these households.
- 7.28 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.
- 7.29 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.
- 7.30 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*”.

Private Rental Market

- 7.31 Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data (first produced in 2013/14) show that median private rents in Charnwood Borough stood at £595 per calendar month (“pcm”) in 2021/22. This represents a 20% increase from 2013/14 where median private rents stood at £495 pcm.
- 7.32 A median private rent of £595 pcm in 2021/22 is comparable to the East Midlands region figure of £650 pcm.

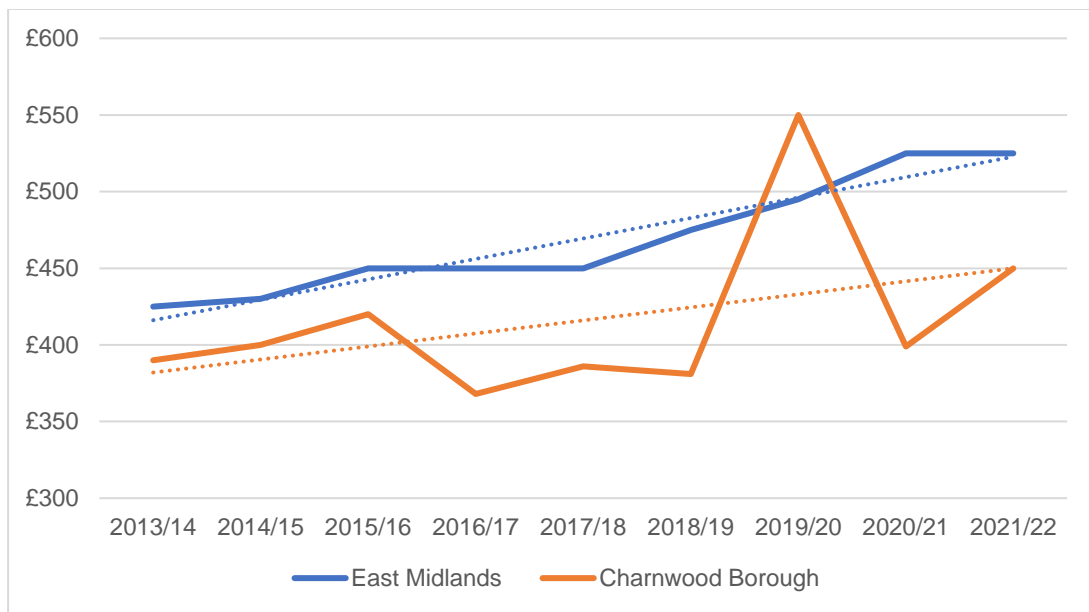
Figure 7.3: Median Private Sector Rents, 2013/14 to 2021/22



Source: VOA and ONS Private Rental Market Statistics

- 7.33 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.
- 7.34 The average lower quartile monthly rent in Charnwood Borough in 2021/22 was £450 pcm. This represents a 15% increase from 2013/14 where average lower quartile monthly rents stood at £390 pcm.
- 7.35 A lower quartile rent of £450 pcm in 2021/22 comparable to the East Midlands region figure of £525 pcm.

Figure 7.4: Lower Quartile Private Sector Rents, 2013/14 to 2021/22

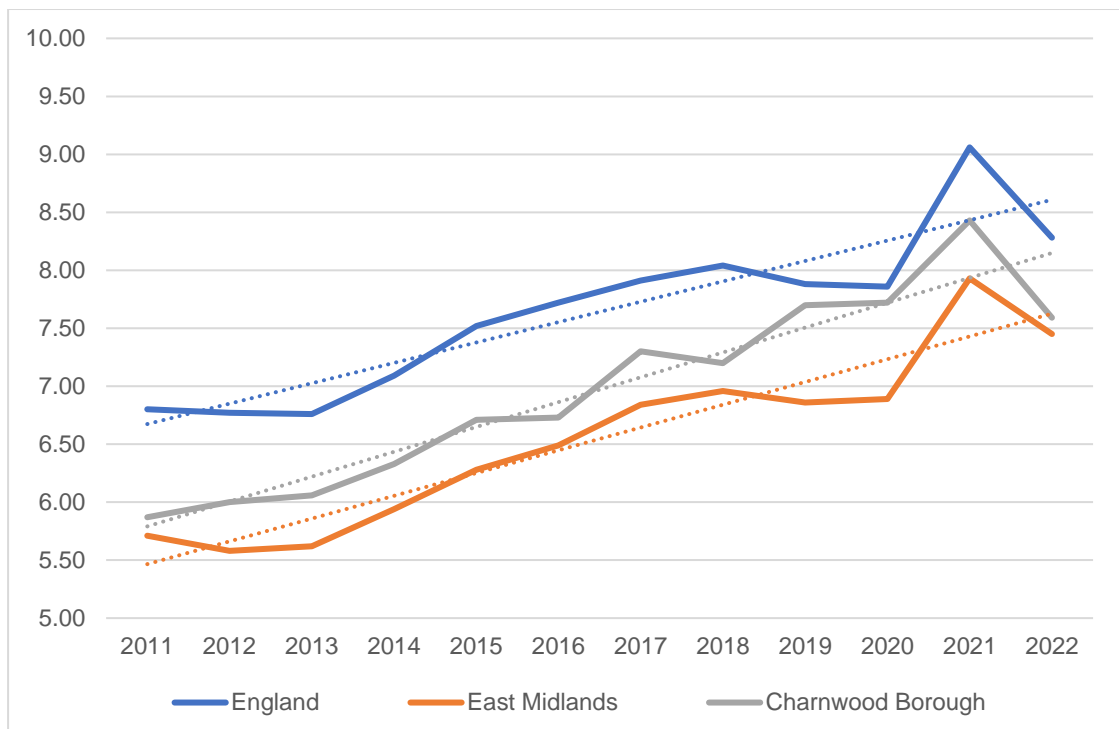


Source: VOA and ONS Private Rental Market Statistics

Median House Prices

- 7.36 The ratio of median house prices to median incomes in Charnwood Borough now stands at 7.59, a 29% increase since the start of the Core Strategy (2015) period in 2011 where it stood at 5.87.
- 7.37 As demonstrated by Figure 7.5, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 7.38 A ration of 7.59 in Charnwood Borough stands above the East Midlands average of 7.45 and just below the national average of 8.28.

Figure 7.5: Median Workplace-Based Affordability Ratio comparison, 2011 to 2022



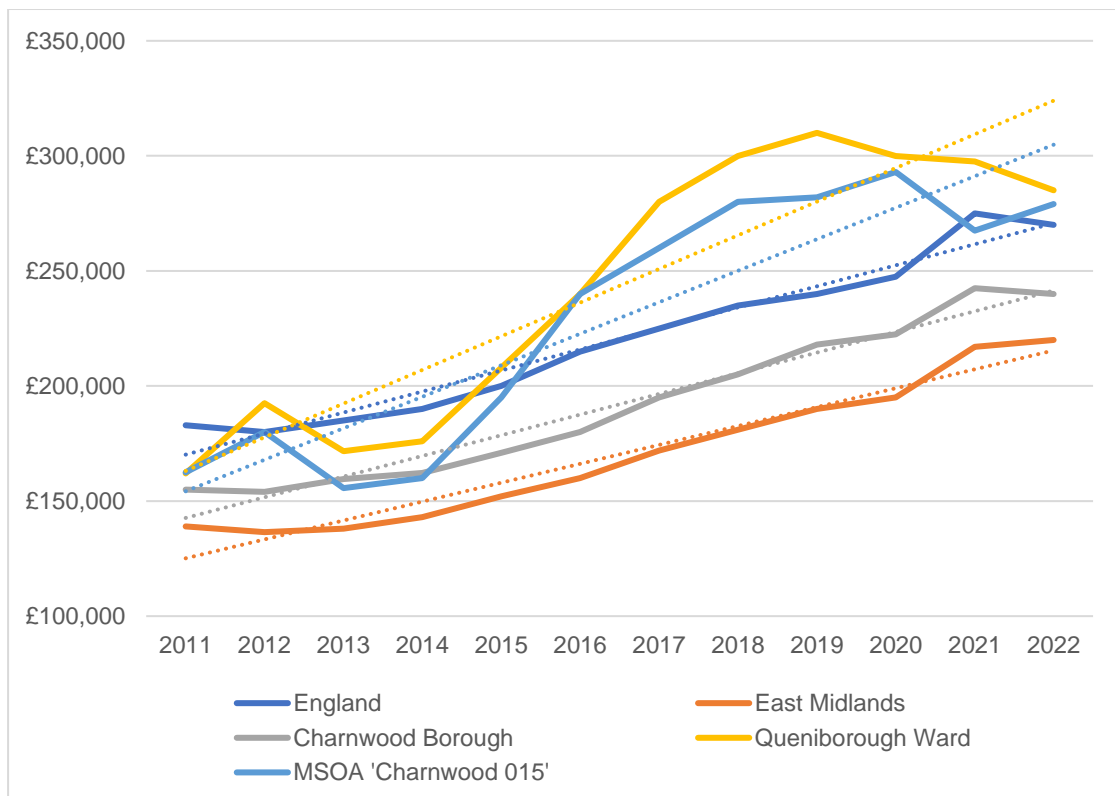
Source: ONS Ratio of House Price to Work-place Based Earnings

7.39 Figure 7.6 illustrates the median house sale prices for England, the East Midlands, Charnwood Borough, Queniborough Ward and MSOA ‘Charnwood 015’. It demonstrates that they have increased dramatically between the start of the Core Strategy (2015) period in 2011 and 2022.

7.40 The median house price across the MSOA has risen by 72% from £162,502 in 2011 to £279,000 in 2022. This compares to a 76% increase across Queniborough Ward, a 55% increase across Charnwood Borough, a 58% increase across the East Midlands and a national increase of 48% over the same period.

7.41 In 2022 median house prices in the MSOA (£279,000) were comparable with Queniborough Ward (£285,025), 16% higher than across Charnwood Borough (£240,000), 27% higher than across the East Midlands (£220,000) and 3% higher than the national figure (£270,000).

Figure 7.6: Median House Price Comparison, 2011 to 2022



Source: ONS HPSSA Datasets 2, 9 and 37

- 7.42 Data is also available from ONS for geographical areas smaller than MSOAs. These are known as Lower Layer Super Output Areas (“LSOA”) which have a minimum population of 1,000 households and a mean population of 1,500 households. The appeal site lies within LSOA ‘Charnwood 015D’.
- 7.43 The median house price in the LSOA for the appeal site has risen by 123% from £148,000 in 2011 to £330,000 in 2022. This figure is 18% higher than the figure of £279,000 for the MSOA, which has already been established as higher than the median house price for the Charnwood Borough, and the East Midlands.
- 7.44 In the 12-month period between March 2021 and March 2022 median house price in the LSOA has increased by 21% from £275,000 to £330,000.
- 7.45 Evidently house prices in the MSOA and LSOA are proportionally higher than in Charnwood Borough thus further constraining opportunities for those in need of affordable home ownership to purchase a home in this area of Charnwood Borough.

Lower Quartile House Prices

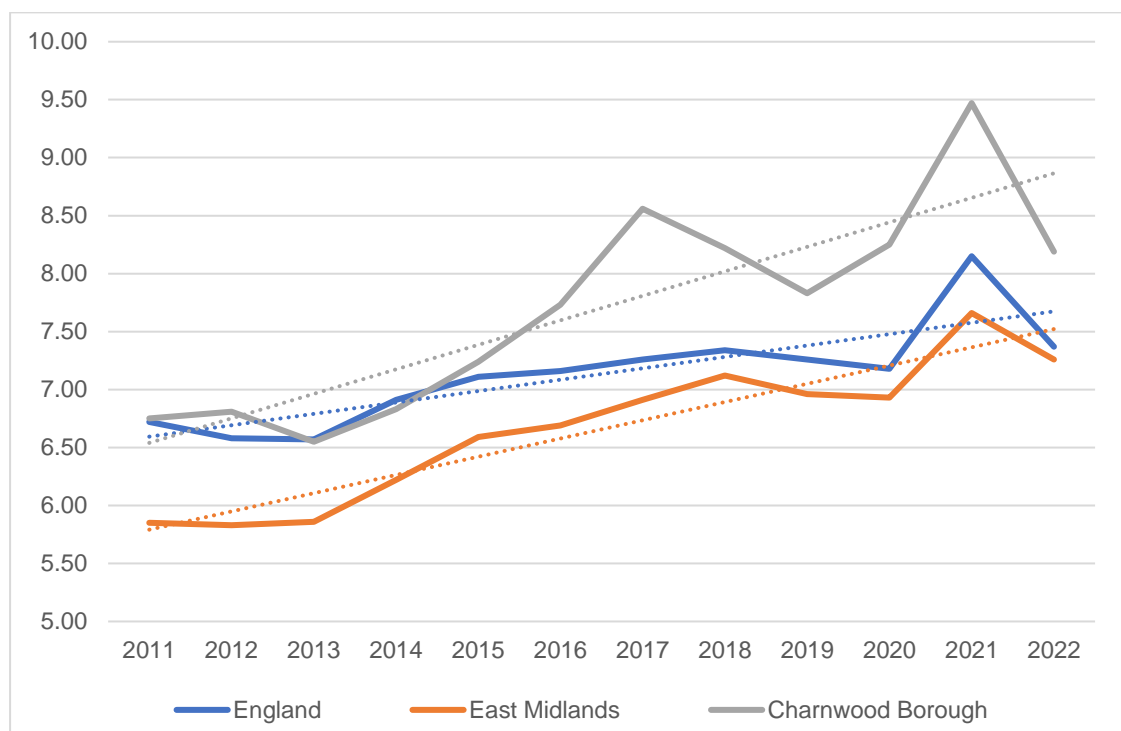
- 7.46 For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to

incomes in Charnwood Borough now stands at 8.19, a 21% increase since the start of the Core Strategy (2015) period in 2011 where it stood at 6.75.

7.47 As demonstrated by Figure 7.7, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.

7.48 It is important to note that the ratio in Charnwood Borough (8.19) stands above the national average 7.37 and the East Midlands average of 7.26.

Figure 7.7: Lower Quartile Workplace-Based Affordability Ratio comparison, 2011 to 2022



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

7.49 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 some 82% higher than that.

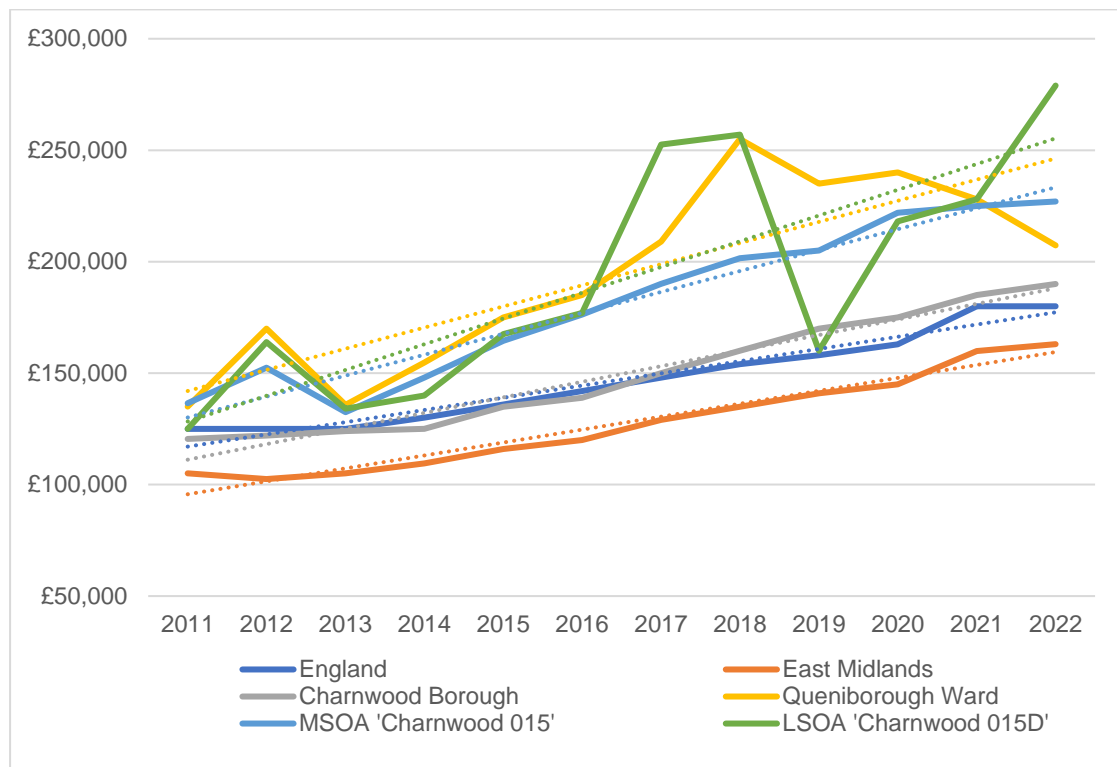
7.50 Figure 7.8 illustrates the lower quartile house sale prices for England, the East Midlands, Charnwood Borough, Queniborough Ward and MSOA 'Charnwood 015'. It demonstrates that they have increased dramatically between the start of the Core Strategy (2015) period in 2011 and 2022.

7.51 The lower quartile house price across the MOSA has risen by 66% from £136,500 in 2011 to £227,000 in 2022. This compares to a 54% increase across Queniborough

Ward, a 58% increase across Charnwood Borough, a 55% increase across the East Midlands and a national increase of 44% over the same period.

- 7.52 In 2022 lower quartile house prices in the MSOA (£227,000) were 10% higher than across Queniborough Ward (£207,250), 19% higher than across Charnwood Borough (£190,000), 39% higher than across the East Midlands (£163,000) and 26% higher than the national figure (£180,000).

Figure 7.8: Lower Quartile House Prices, 2011 to 2022



Source: ONS HPSSA Datasets 4, 15 and 39

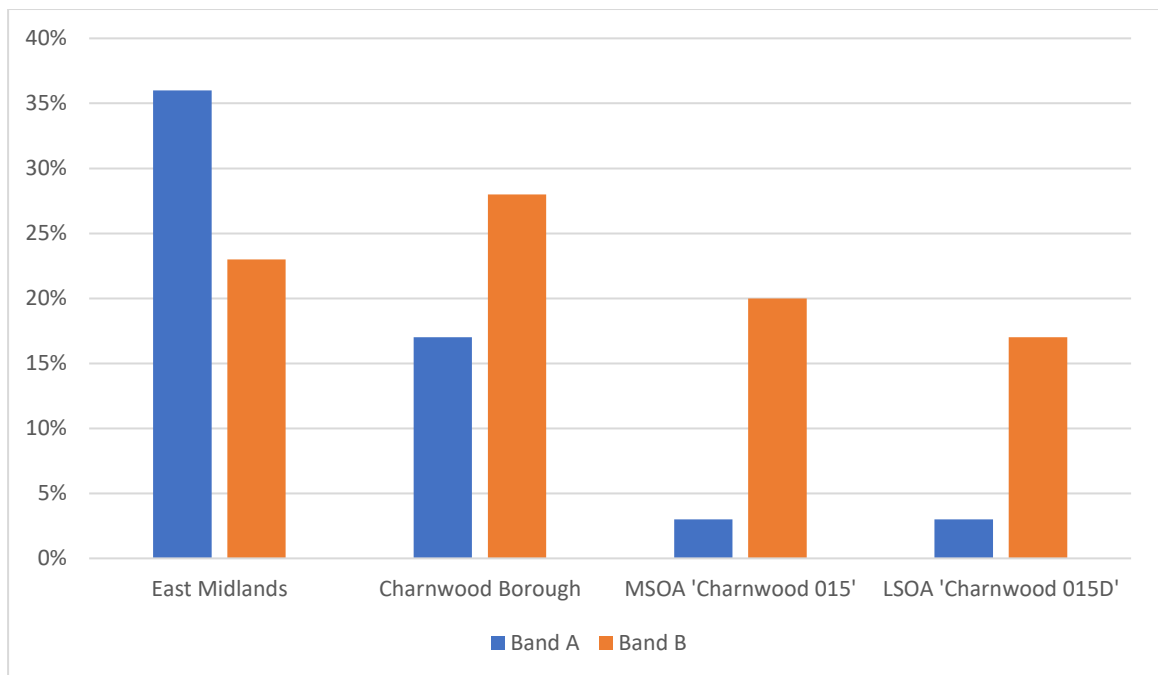
- 7.53 The lower quartile house price in the LSOA¹² for the appeal site has risen by 123% from £125,000 in 2011 to £279,000 in 2022. This figure is 23% higher than the figure of £227,000 for the MSOA, which has already been established as higher than the lower quartile house price for Queniborough Ward, Charnwood Borough, and the East Midlands.

Council Tax Bands

- 7.54 Further evidence of the need for affordable housing in the LSOA is provided by the VOA's data for Council Tax bands as at 31 March 2022, which is broken down into MSOAs and LSOAs.

¹² ONS HPSSA Dataset 48

Figure 7.9: Percentage of Properties in Council Tax Band A and B at 31 March 2022



Source: VOA CTSOP 1.1

- 7.55 Figure 7.9 demonstrates that the LSOA that includes the appeal site 3% of properties are in Council Tax Band A (the lowest band) and just 17% of properties are in Council Tax Band B.
- 7.56 This compares to 3% of properties being in Council Tax Band A in the MSOA which is also considerably lower than the 17% of properties across Charnwood Borough as a whole and 36% across the East Midlands indicating that higher value properties are more prevalent in the lower super output area than across the MSOA, authority and the region.

Conclusions on Affordability Indicators

- 7.57 As demonstrated through the analysis in this section, affordability across Charnwood Borough has been and continues to be, in crisis.
- 7.58 House prices and rent levels in both the average, 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 Charnwood Borough out of the reach of more and more people.
- 7.59 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Charnwood Borough, with a lower quartile house price to average income ratio of 8.19.

- 7.60 Market signals indicate a worsening trend in affordability in Charnwood Borough and within Queniborough Ward, MSOA 'Charnwood 015' and LOSA 'Charnwood 015D'. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Future Supply of Affordable Housing

Section 8

Future Affordable Housing Supply

- 8.1 The future delivery of affordable housing is highly uncertain. Within Charnwood Borough the delivery of affordable homes has fluctuated considerably since the start of the Core Strategy (2015) period in 2011, as illustrated in Figures 6.1 and 6.2.
- 8.2 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.

Addressing the Shortfall in Affordable Housing Delivery

- 8.3 The 2022 HENA identifies an objectively assessed need for 827 net affordable homes per annum between 2021/22 and 2030/31. Over the 10-year period this equates to a total need for 8,270 net affordable homes.
- 8.4 Since the start of the 2021/22 monitoring period, the Council have overseen the delivery of 39 affordable homes (net of Right to Buy) against a need of 827 net new affordable homes which has resulted in a shortfall of -788 affordable homes over the 1-year period.
- 8.5 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 PPG¹³ and endorsed at appeal.
- 8.6 The Inspector presiding over the appeal at land off Aviation Lane, Burton-upon-Trent where I presented evidence, which was allowed in October 2020 (**CD6.21**) set out at paragraph 8 of her decision that:

“In my view, the extent of the shortfall and the number of households on the Council’s Housing Register combine to demonstrate a significant pressing need for affordable housing now. As such, I consider that, the aim should be to meet the shortfall as soon as possible.” (My emphasis).

¹³ Paragraph: 031 Reference ID: 68-031-20190722

8.7 Similarly, in considering the disputed sites in the Council's five-year housing land supply that did not yet have planning permission the Inspector stated at paragraph 9 that:

"I am not convinced, in accordance with the guidance in the PPG and the Framework, that there is clear evidence that the 108 dwellings relied on by the Council from these two sites would be deliverable within five years. There is nothing within the Framework or the PPG to suggest that this definition should not apply to affordable housing as well as market housing." (My emphasis).

8.8 The Inspector went on to set out at paragraph 11 that:

"My concern, given the nature of the development proposed, is whether the affordable housing needs of the District are being met. These are households in need of a home now. While the Council is of the view that there is not an overwhelming need for affordable housing which cannot be met within the settlement boundary, on allocated sites or through current planning permissions, just by excluding these three sites from its five year housing supply, the Council's expectation of 884 houses coming forward within five years is reduced to 768 which would be below the five year requirement of 818 dwellings including the existing shortfall." (My emphasis).

8.9 It is therefore imperative that the 788 dwelling affordable housing shortfall accumulated since 2021/22 in Charnwood Borough is addressed as soon as possible and in any event within the next five years.

8.10 When the shortfall is factored into the 2022 HENA identified need of 827 affordable homes per annum for the period 2022/23 and 2026/27, the number of affordable homes the Council will need to complete substantially increases to 985 net affordable homes per annum for the period 2022/23 to 2026/27.

8.11 This would ensure that for the remainder of the period up to 2030/31 the annual affordable housing need reduces to 827 per annum to deal solely with newly arising needs. This is illustrated in Figures 8.1 and 8.2.

Figure 8.1: Annual Affordable Housing Need incorporating Backlog Needs since the 2020/21 base date of the 2022 HENA

A	Affordable housing need per annum for the period 2020/21 to 2036/37 identified in the 2020 HNA	827
B	Net Affordable housing need for the period 2021/22 (A x 1)	827
C	Net of Right to Buy sales Affordable housing completions for the period 2021/22	39
D	Shortfall/backlog of affordable housing need for the period 2020/21 to 2021/22 (B – C)	788
E	Backlog affordable housing need per annum required over the period 2022/23 to 2026/27 (D/5)	158¹⁴
F	Full affordable housing need per annum for the period 2022/23 to 2026/27 (A + E)	985
G	Full affordable housing need for the period 2022/23 to 2026/27 (F x 5)	4,925

8.12 Further illustration of the severity of the situation can be seen in Figure 8.2 below which illustrates that the Council need to deliver 4,925 net affordable homes over the next five years to address backlog needs in line with the Sedgefield approach.

Figure 8.2: Annual Affordable Housing Need 2022/23 to 2026/27 incorporating Backlog Needs Accrued in 2021/22 when applying the Sedgefield Approach

Monitoring Period	2022 HENA Net Affordable Housing Need	Net Affordable Housing Need When Addressing Backlog Within Next Five Years
2022/23	827	985
2023/24	827	985
2024/25	827	985
2025/26	827	985
2026/27	827	985
Total	4,135	4,925

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

¹⁴ 157.6 rounded.

The Future Supply of Affordable Housing

- 8.14 The Council has published its Five Year Housing Land Supply Statement (“5YHLS”) in December 2022 (**CD5.24**), covering the period 1 April 2022 to 31 March 2027.
- 8.15 If we were generously to assume that all 3,701 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels¹⁵ of affordable housing (i.e., 40%) as a proportion of overall housing completions, this is likely to deliver only 1,480 affordable dwellings over the period, equating to just 296 new affordable dwellings per annum. This figure is likely to be much lower if the prevailing rate of Right to Buy losses continues as per Figure 6.2¹⁶. I.e., 260 new affordable dwellings per annum.
- 8.16 This figure falls substantially short of the 985 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and significantly short of the 827 net affordable housing needs per annum identified in the 2022 HENA.
- 8.17 As Figure 6.2 of this evidence highlights, affordable housing provision has slipped far below the policy compliant 20-40% since the start of the plan period in 2011/12 up to 2021/22. Average delivery on a per annum basis over the same period has been just 137 affordable homes net of Right to Buy.
- 8.18 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, being granted planning permission now in order to boost the supply of affordable housing.

Conclusions on Future Affordable Housing Supply

- 8.19 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 60 affordable dwellings on this site to address the district-wide needs of Charnwood Borough should be afforded **substantial weight** in the determination of this appeal.

¹⁵ Core Strategy Policy CS3 requires 20%, 30% and 40% affordable housing provision depending on location.

¹⁶ 296 – 36 RtB losses per annum as per Figure 6.2 (between 2017/18 and 2021/22 where acquisitions data is available) = 260 affordable dwellings per annum.

Council's Assessment of the Application

Section 9

Committee Report

- 9.1 The application was refused on 9 December 2022 (**CD4.01**) at Committee. The Committee Report can be seen under **CD4.02** which recommended the application for refusal.
- 9.2 Page 3 of the Committee Report sets out that Core Strategy (2015) Policy CS3 requires 30% affordable housing provision at major sites within Queniborough. However, it is assumed this is a typo error as 40% affordable housing provision is required in Queniborough as per Policy CS3.
- 9.3 Page 12 outlines the consultee comment from the Charnwood Affordable Housing Team which states that *"40% affordable housing required (77% rent, 23% shared ownership). The housing mix and type has not been provided and will need to take into consideration and meet the requirements of the Housing SPD."*
- 9.4 Page 25 explains that the size, type and design of the affordable units will be decided at the RM stage and outlines the recommended dwelling mix as per the 2022 HENA.
- 9.5 Page 26 then goes on to state that *"It is considered that a proposal which complies with Policies CS3 and Q12 could be achieved. The provision of up to 60 affordable units is also considered to be a significant benefit of the scheme which is to be weighed within the planning balance."* (my emphasis).
- 9.6 As such, I do not consider that the Council sufficiently assessed the substantial benefits, such as affordable housing, that the scheme would achieve. This represents a serious omission from the planning balance exercise.

Charnwood Borough Council Statement of Case

- 9.7 The Council submitted their Statement of Case ("SoC") in respect of the appeal proposals to the Inspectorate in April 2023 which can be viewed under **CD8.3**.
- 9.8 Page 2 of the Council's SoC outlines that one of the reasons for refusal was the absence of a signed Planning Obligation (although a Draft Heads of Terms was

provided). It is important to note that the appeal submission will be supported by a signed S106 agreement.

- 9.9 The Council's SoC fails to discuss the weight attributed to the provision of affordable housing.
- 9.10 It is therefore clear in my opinion that the Council have deliberately sought to downplay the provision of up to 60 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit¹⁷ of the appeal proposals which should be afforded **substantial weight** in the determination of this appeal.

¹⁷ As set out at Section 11 of this Evidence

Benefits of the Proposed Affordable Housing at the Appeal Site

Section 10

- 10.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 10.2 As set out in the previous chapter there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. Charnwood Borough is no exception to this.
- 10.3 The appeal scheme will provide up to 60 affordable dwellings on site. Tenure split to be agreed at the Reserved Matters stage.
- 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.

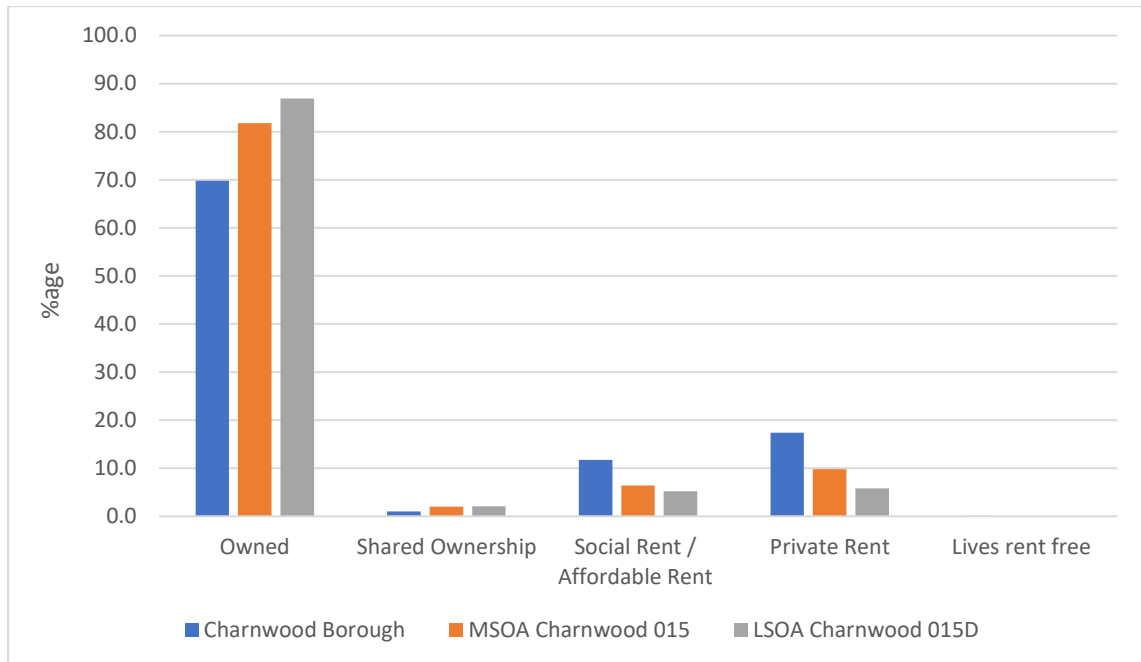
Benefits of the proposed Affordable Housing at the appeal site

- 10.5 The offer meets the requirements of adopted Policy CS3 (40%) of the Core Strategy (2015). It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or 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 (**CD6.23**) in September 2018 who was clear at paragraph 72 of their decision that:

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

10.7 Figure 10.1 below illustrates the breakdown of tenures within Charnwood Borough, MSOA 'Charnwood 015' and LSOA 'Charnwood 015D' compared with that nationally and regionally at the time of the 2021 Census.

Figure 10.1: Tenure Comparison



Source: Census 2021

10.8 Figure 10.1 clearly shows that at the time of the Census 2021, owner occupation was by far the most common tenure in Charnwood Borough (69.8%), the MSOA (81.8%) and the LSOA (86.9%). Note that owner occupation is much more prevalent at LSOA and MSOA level than at the Borough level.

10.9 When understanding the composition of the remaining housing stock in these areas, shared ownership properties are by far the most uncommon, representing just 1% at Borough level. There are just 60 shared ownership dwellings in the MOSA equal to 2% of stock and only 16 shared ownership dwellings in the LOSA, once again equal to 2% of stock.

10.10 The MSOA and LSOA also have a very low provision of social/affordable rented homes at just 6.4% (193 dwellings) and 3.9% (5.2 dwellings) respectively.

10.11 Whilst the exact tenure split of the proposed affordable dwellings will be decided at the Reserved Matters stage, the tenure split will reflect the most up to date assessment of affordable housing need at the point of determination and will therefore contribute towards addressing the polarised tenure profile of both the MSOA and LSOA to provide a more balanced community and to enhance the vitality of this rural locality.

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

- Policy compliant offer of 40% (up to 60 dwellings) of the scheme provided as affordable housing;
- A deliverable scheme which provides much needed affordable homes for the District and locally, where there is evidence of local need in the number of bids per property advertised and lettings;
- Addressing the polarised tenure profile locally;
- 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 insulation¹⁸; and
- Greater security of tenure than the private rented sector.

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

¹⁸ Appendix JS5 – Watt a Save by HBF – October 2022.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 11

- 11.1 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.
- 11.2 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*”.
- 11.3 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*”.
- 11.4 I also note the findings of Inspector Kevin Ward in July 2015 who considered (and subsequently allowed) an outline planning permission for the erection of up to 90 dwellings with vehicular access on to Hollybush Lane and associated public open space, landscaping, and drainage work on land at Firlands Farm, Hollybush Lane, Burghfield Common, Reading, Berkshire (**CD6.15**).
- 11.5 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.”*
- 11.6 The context of this decision is in relation to a previously determined appeal at Mans Hill also located within Burghfield Common (**CD6.24**). Mr Ward set out his comments in relation to the distinction between the two appeals at paragraphs 70 and 71, which I set out below:

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

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

11.7 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.

11.8 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 (**CD6.16**). 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)

11.9 I agree, the recipients of 60 homes here will not describe their needs as generic.

11.10 Considering the authority’s past poor and lamentable record of affordable housing delivery and high and rising numbers of households on the housing register, there can be no doubt in my mind that the provision of up to 60 affordable dwellings on this site should be afforded **substantial weight** in the determination of this appeal.

Relevant Secretary of State and Appeal Decisions

- 11.11 The importance of affordable housing as a material consideration has been reflected in several Secretary of State (“SoS”) and appeal decisions.
- 11.12 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 JS6**.
- 11.13 Brief summaries of appeal decisions relevant to this appeal are summarised at **Appendix JS7**.
- 11.14 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

- 11.15 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.
- 11.16 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.
- 11.17 Market signals indicate a worsening trend in affordability across Charnwood Borough 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.

11.18 Against the scale of unmet need and the lack of suitable alternatives in the private rented sector across Charnwood Borough, there is no doubt in my mind that the provision of up to 60 affordable homes will make a substantial contribution. Considering all the evidence I consider that this contribution should be afforded **substantial weight** in the determination of this appeal.