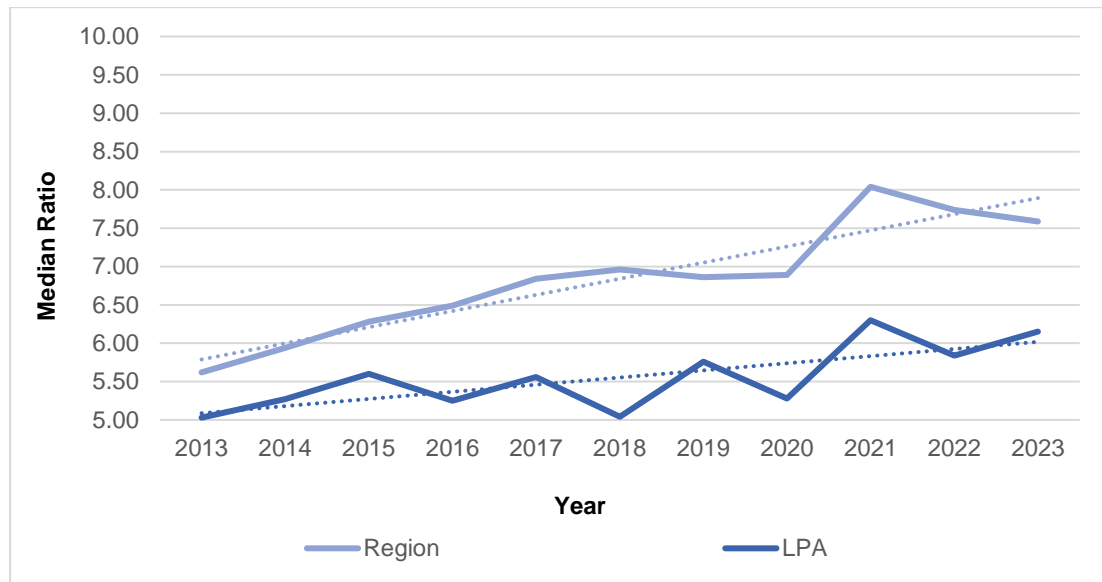


### Median House Prices

7.42 The ratio of median house prices to median incomes in Ashfield now stands at **6.15**, a 22% increase since the start of the 2015 SHMA period in 2013/14 where it stood at 5.03

Figure 7.6: Median Workplace-Based Affordability Ratio comparison, 2013 to 2023

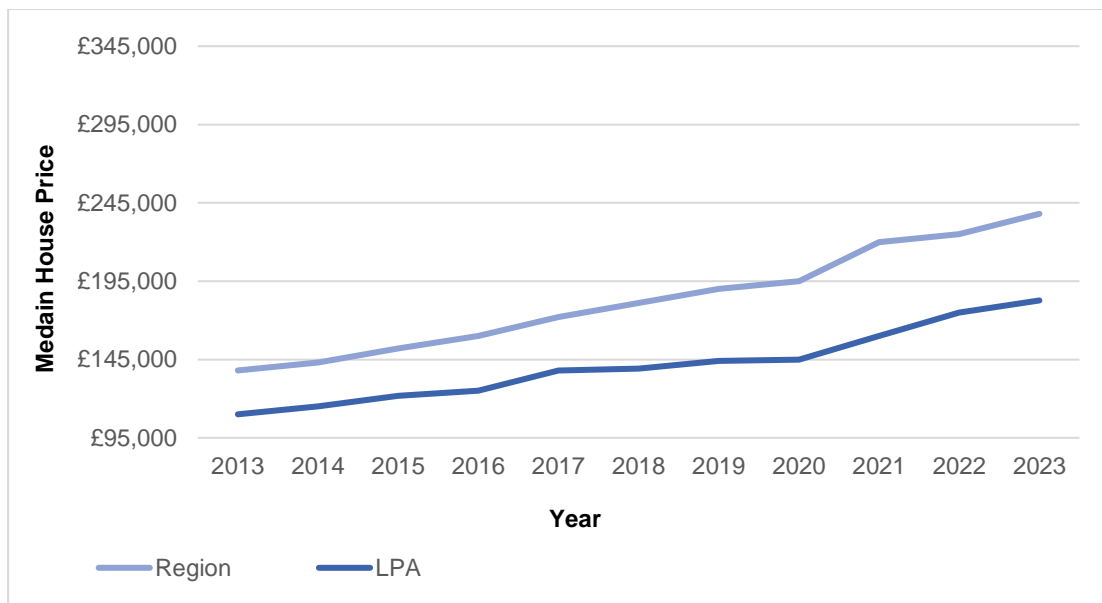


Source: ONS.

7.43 It is also worth noting that the median ratio increased in the last year while it decreased regionally.

7.44 Figure 7.7 illustrates the median house sale prices for the East Midlands, and Ashfield. It demonstrates that they have increased dramatically between the start of the 2015 SHMA period in 2013/14 and 2023.

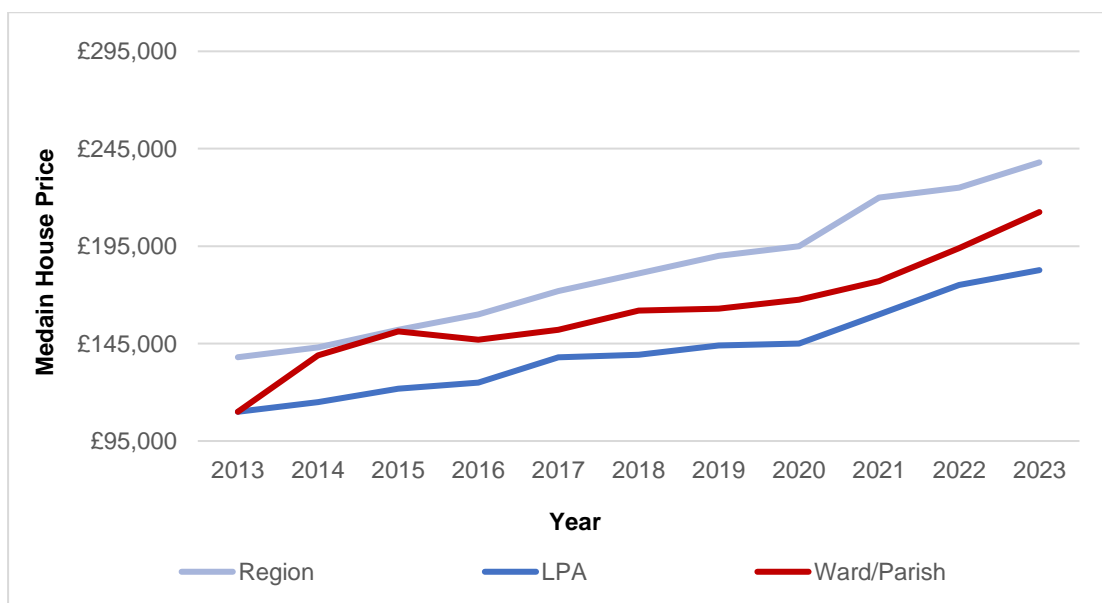
Figure 7.7: Median House Price Comparison, 2013 to 2023



Source: ONS.

- 7.45 The median house price across Ashfield has risen by 66% from £110,000 in 2013 to £182,700 in 2023. It should also be noted that since the start of the 2015 SHMA period median house prices in Ashfield have increased by 66 %.
- 7.46 Figure 7.8 below compares the median house sale prices in the Sutton Junction & Harlow Wood Ward with Ashfield and the East Midlands. It demonstrates that they have increased dramatically between the start of the 2015 SHMA period in 2013 and 2023.

Figure 7.8: Median House Price Comparison, 2013 to 2023



Source: ONS.

7.47 The median house price across the Sutton Junction & Harlow Wood Ward has risen by 93% from £110,000 in 2013 to £212,500 in 2023. This figure is 16% higher than the Ashfield District figure of £182,700, (which has seen an increase of 66% over the period).

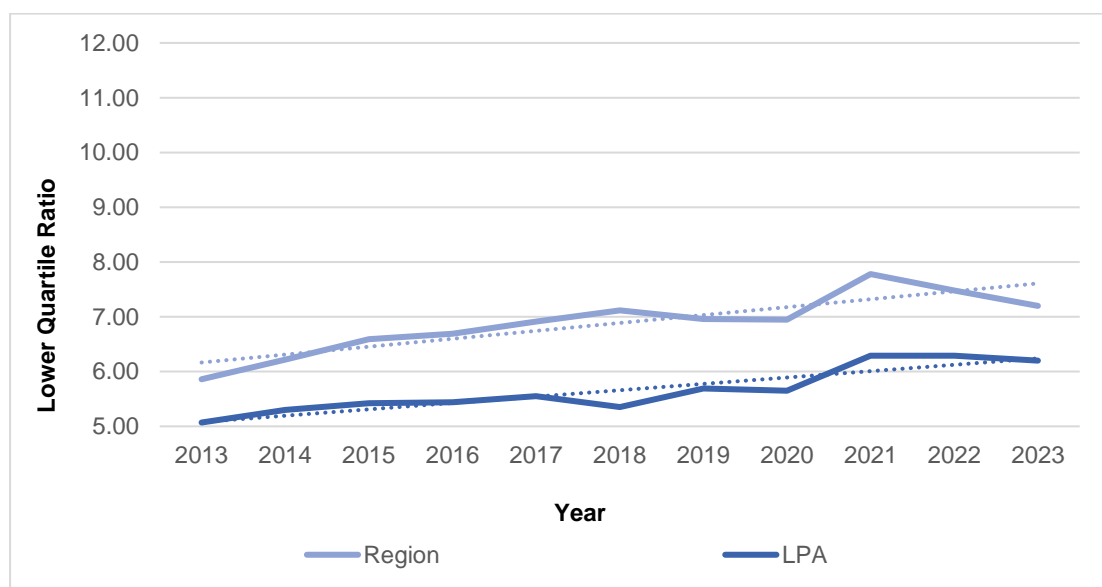
### Lower Quartile House Prices

7.48 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 Ashfield in 2023<sup>16</sup> stood at **6.20**, a 22% increase since the start of the 2015 SHMA period in 2013/14 when it stood at 5.07.

7.49 This means that those on lower quartile incomes in Ashfield, seeking to purchase a median priced property, now need to find more than 6 times their annual income to do so.

7.50 The ratio in Ashfield stands lower than the East Midlands average of 7.2 (-16%). However, a ratio of 6.20 still indicates that housing in this area is significantly unaffordable for a significant part of the local population.

*Figure 7.9: Lower Quartile Workplace-Based Affordability Ratio comparison, 2013 to 2022*

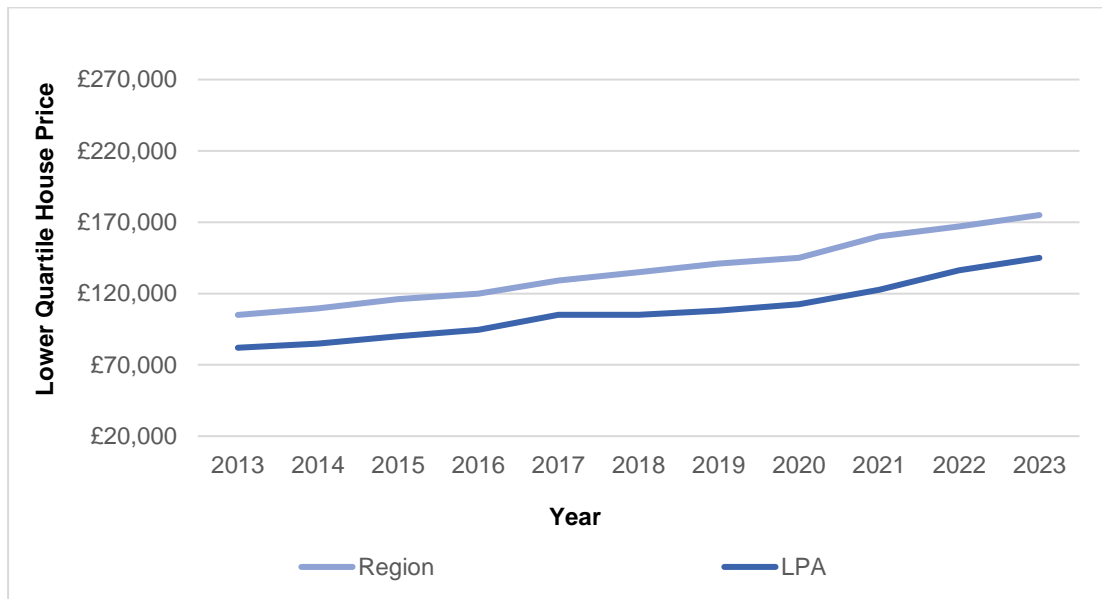


Source: ONS.

<sup>16</sup> Please note that lower quartile house price to income ratio data is only available up to 2023.

- 7.51 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 38% higher than that.
- 7.52 Figure 7.10 illustrates the lower quartile house sale prices for East Midlands, and Ashfield. It demonstrates that they have increased dramatically between the start of the SHMA period in 2013 and 2023.

*Figure 7.10: Lower Quartile House Prices, 2013 to 2023*

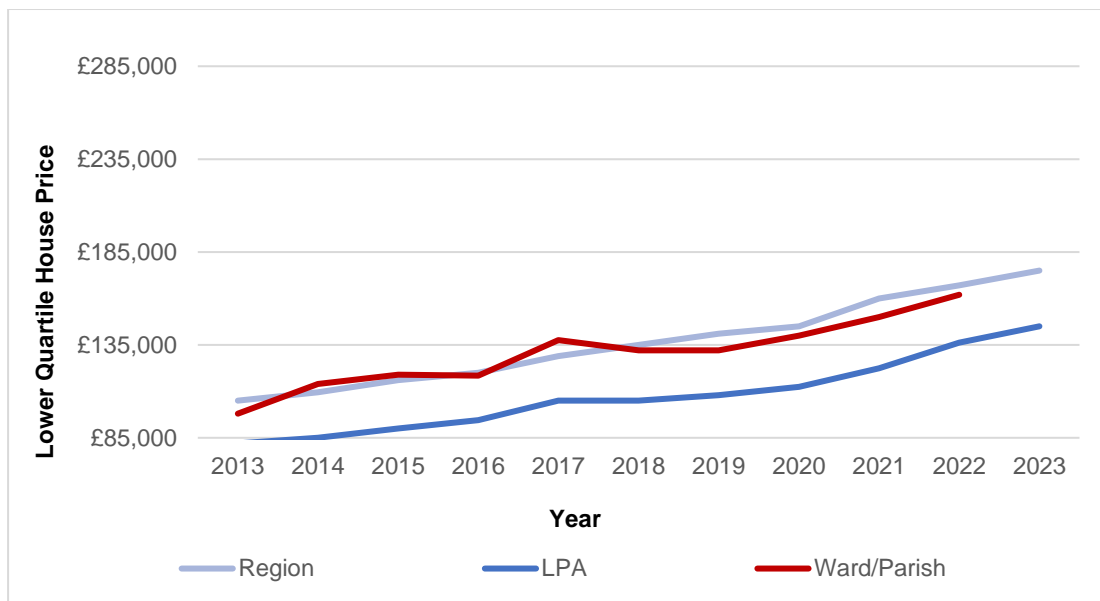


Source: ONS.

- 7.53 The lower quartile house price across Ashfield has risen by 77% from £82,000 in 2013 to £145,000 in 2023. This compares to a 67% increase across the East Midlands over the same period.
- 7.54 It should also be noted that since the start of the 2015 SHMA period lower quartile house prices in Ashfield have increased by 52%.
- 7.55 Figure 7.11 below compares the lower quartile house sale prices in the Sutton Junction & Harlow Wood Ward with Ashfield District and the East Midlands. Once again it demonstrates that they have increased dramatically between the start of the 2015 SHMA period in 2013 and 2022<sup>17</sup>.

<sup>17</sup> 2023 ONS Lower Quartile data for Wards been discontinued.

Figure 7.11: Lower Quartile House Price Comparison, 2013 to 2022



Source: ONS.

- 7.56 The lower quartile house price across the Sutton Junction & Harlow Wood Ward has risen by 65% from £98,000 in 2013 to £162,000 in 2022. This figure is 19% higher than the Ashfield figure of £136,248 (in 2022).

### Summary and Conclusions

- 7.57 As demonstrated through the analysis in this section, affordability across Ashfield has been, and continues to be, in crisis.
- 7.58 House prices and rent levels in both the median and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Ashfield 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 Ashfield, with a lower quartile house price to average income ratio of 6.20. It is also worth noting that the median ratio increased in the last year while it decreased in regional and national level.
- 7.60 Market signals indicate a worsening trend in affordability in Ashfield and within the Sutton Junction & Harlow Wood Ward. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

# Future Supply of Affordable Housing

---

## Section 8

### **Introduction**

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

### **Addressing the Shortfall in Affordable Housing Delivery**

- 8.2 The latest needs assessment for Ashfield is the 2024 GNAHN, however there is currently only one year of monitoring data against this assessment. Therefore, I have used the 2020 HNA as the starting point given there is 3 years' worth of monitoring data against this assessment. Notwithstanding this, the single year monitoring data available against 2024 GNAHN shows there is a -4 affordable housing delivery (net of Right to Buy) in the 2022/23 period which continues the trend of under delivery since the start of the 2020 HNA monitoring period in 2020/21 as detailed below. It is also worth noting that annual affordable housing need has risen to 399 per annum under the 2024 GNAHN.
- 8.3 The 2020 HNA identifies an objectively assessed need for 319 net affordable homes per annum between 2020/21 and 2037/38. Over the 18 -year period this equates to a total need for 5,742 net affordable homes.
- 8.4 Since the start of the 2020/21 monitoring period, the Council have overseen the delivery of 78 affordable homes (net of Right to Buy) against a need of 957 net new affordable homes, which has resulted in a shortfall of -882 affordable homes.
- 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 PPG<sup>18</sup> and endorsed at appeal.
- 8.6 The critical importance of understanding the ability of the Council to meet future need was considered in a recent appeal at Sondes Place Farm, Dorking where I provided affordable housing evidence.

---

<sup>18</sup> Paragraph: 031 Reference ID: 68-031-20190722

- 8.7 The Inspector accepted the findings of the ‘future supply of affordable housing’ evidence and endorsed the use of the Sedgefield approach to clear a previous backlog of affordable housing delivery (**CD 7.13, p.16 [85-86]**):

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

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

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

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

- 8.9 It is therefore imperative that the -882 dwelling affordable housing shortfall accumulated since 2020/21 is addressed as soon as possible and in any event within the next five years.

- 8.10 When the shortfall is factored into the 2020 HNA identified need of 319 affordable homes per annum for the period 2020 and 2038, the number of affordable homes the Council will need to complete increases by 55% to 495 net affordable homes per annum over the period.

- 8.11 This would ensure that for the remainder of the period up to 2038 the annual affordable housing need reduces to 319 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 2020 HNA.

<b>A</b>	Affordable housing need per annum for the period 2020/21 to 2022/23 identified in the 2020 HNA	<b>319</b>
<b>B</b>	Net Affordable housing need for the period 2020/21 to 2022/23 (A x 3)	<b>957</b>
<b>C</b>	Net of Right to Buy sales Affordable housing completions for the period 2020/21 to 2022/23	<b>78</b>
<b>D</b>	Shortfall/backlog of affordable housing need for the period 2020/21 to 2022/23 (B – C)	<b>879</b>
<b>E</b>	Backlog affordable housing need per annum required over the period 2024/25 to 2028/29 (D/5)	<b>176</b>
<b>F</b>	Full affordable housing need per annum for the period 2024/25 to 2028/29 (A + E)	<b>495</b>
<b>G</b>	Full affordable housing need for the period 2024/25 to 2028/29 (F x 5)	<b>2,475</b>

\* Please note that figures account for rounding

8.12 Further indication of the severity of the situation can be seen in Figure 7.2 below which illustrates that the Council need to deliver 2,475 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 2024/25 to 2028/29 incorporating Backlog Needs Accrued in 2020/21 to 2022/23 when applying the Sedgefield Approach

Monitoring Period	2020 HNA Net Affordable Housing Need per annum	Net Affordable Housing Need per annum When Addressing Backlog Within Next Five Years
2023/24	319	495
2024/25	319	495
2025/26	319	495
2026/27	319	495
2027/28	319	495
<b>Total</b>	<b>1,595</b>	<b>2,475</b>

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



## The Future Supply of Affordable Housing

- 8.14 The Council has published its latest Five-Year Housing Land Supply Statement (“5YHLS”) in July 2024 (**CD 12.1**), covering the period 1 April 2024 to 31 March 2029.
- 8.15 If we were to generously to assume that all 2,060 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (i.e. 10%) as a proportion of overall housing completions, this is likely to deliver only 206 affordable dwellings over the period, equating to just 41 new affordable dwellings per annum.
- 8.16 This figure falls substantially short of the 495 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 319 net affordable housing needs per annum identified in the 2020 HNA.
- 8.17 Figure 6.1 of this evidence shows that since the start of the 2020 HNA period in 2020/21 gross affordable housing delivery as averaged 19% of total completions. Should losses to Right to Buy or demolitions be included the figure is lower at 8%.
- 8.18 If the prevailing rate of gross affordable housing delivery since the start of the 2020 HNA (2020/21 to 2022/23) of 19% be applied to the five-year housing supply likely to be eligible to contribute towards affordable housing provision (2,060 dwellings) there is a future supply of 391<sup>19</sup> affordable dwellings over the five-year period between 1 April 2023 to 31 March 2028. This equates to just 78<sup>20</sup> gross affordable dwellings per annum.
- 8.19 However, should losses to Right to Buy be accounted for the prevailing rate of delivery since the start of the 2020 HNA period (2020/21 to 22/23) falls to 8%, as demonstrated by Figure 6.2 of this evidence. This would result in a future affordable housing supply of just 165<sup>21</sup> affordable dwellings over the five-year period between 1 April 2023 to 31 March 2028. This equates to just 33<sup>22</sup> dwellings (net of Right to Buy) per annum.
- 8.20 I consider this to be a much more realistic outcome.
- 8.21 Both figures derived from the analysis fall very substantially short of the 495 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach.

<sup>19</sup>  $2060 * 0.19 = 391.4$  (rounded 391).

<sup>20</sup>  $391 / 5 = 78.2$  (rounded to 78).

<sup>21</sup>  $2060 * 0.08 = 164.8$  (rounded 165).

<sup>22</sup>  $165 / 5 = 33$ .

- 8.22 Furthermore, both figures also fall substantially short of the 319 net affordable housing needs per annum identified in the 2020 HNA and the revised needs of 399 per annum as per the 2024 HNA.
- 8.23 Consequently, I have no confidence that the Council can see a sufficient step change in the delivery of affordable housing to meet annual needs. This makes it even more important that suitable sites, such as the appeal site, are granted planning permission now in order to boost the supply of affordable housing.

### **Summary and Conclusions**

- 8.24 It is imperative that the -882 dwelling affordable housing shortfall accumulated since 2020/21 is addressed as soon as possible and in any event within the next five years.
- 8.25 When the shortfall is factored into the 2020 HNA identified need of 319 affordable homes per annum for the period 2020 and 2038, the number of affordable homes the Council will need to complete increases by 55% to 495 net affordable homes per annum over the period.
- 8.26 The above evidence demonstrates that Council is unlikely to be able to meet its affordable housing needs over the next five years. Generously assuming all sites in the in the 5YHLS would provide policy compliant levels of affordable housing there is a possible supply of just 41 new affordable dwellings per annum and 78 dwellings per annum when gross delivery is considered and 33 dwellings (net of Right to Buy) per annum.
- 8.27 Consequently, there is a substantial need for more affordable housing now. In light of the Council's poor record of affordable housing delivery and the volatility of future affordable housing delivery there can be no doubt that the provision of up to 30 affordable dwellings on this site to address the District-wide needs of Ashfield should be afforded **substantial weight** in the determination of this appeal.

# Council's Assessment of the Application

---

## Section 9

### Introduction

- 9.1. This section of the evidence considers the Council's Assessment of the appeal proposals during the course of the application and the appeal process.

### Committee/Officer Report

- 9.2. The application was considered at a planning committee meeting on 31<sup>st</sup> July 2024 with Officer recommendation to approve the application, the Committee Report can be seen under **CD 3.1**. The Planning Committee resolved to defer consideration of the application until a later time, as a consequence the applicants have appealed to the Planning Inspectorate on non-determination grounds.
- 9.3. Affordable housing is considered under the heading 'Provision of Affordable Housing' on page 34 of the committee report. It summarises the current Policy position for affordable housing provision and states 6% provision is required in compliance with Policy HG4 of the Local Plan, however it does concede that the policy is out of date. Given the proposals exceed local plan policy requirements the report summarises the position on affordable housing as below:

*"Irrespective of the above and having had regard to the current planning policies it is on balance considered that subject to a Section 106 to secure the provision and transfer of the affordable housing offer to a registered provider the proposal is acceptable in respect to affordable housing."*

- 9.4. Under the 'Planning Balance' section on page 38 the report states the following on the weight afforded to affordable housing:

*"In contrast, the proposal would deliver 300 dwellings, including 30 affordable dwellings to meet the current needs of the District. This would make a limited contribution to meeting the need for affordable housing requirements in the District. This limited contribution goes some way to meet the affordable housing need identified in the evidence supporting the emerging local plan but provides limited weight. However, delivery will also be unlikely to be made in the first 4 years following the outline consent. It is accepted the Council has not got a 4-*

*year housing supply, that the 4 years target is a minimum and there is a national and local need to increase housing delivery. It is therefore considered that substantial weight should be afforded to developments meeting this requirement.”*

- 9.5. I disagree with the assessment that the delivery of 30 affordable homes would make a limited contribution to meeting District affordable housing needs. As has been demonstrated in this evidence there is a substantial need for affordable homes which the Council is failing to meet, there is also a significant backlog that needs to be cleared. These issues have not been considered in the report.
- 9.6. Furthermore, an appeal at Sutton in Ashfield (**CD 7.7**) in Ashfield District decided in December 2021 highlighted the need for affordable housing in the District and attached substantial weight to the provision of affordable housing. At Paragraph 85 the inspector states the following:

*“Having regard to the Government’s objective of significantly boosting the supply of homes, the proposed development would have the benefit of contributing up to 300 dwellings towards the supply of housing in the District. Of those dwellings, the proposed 10% contribution to the local supply of affordable housing would be an added benefit, particularly due to the likely numbers involved and the clear need for such housing in the District. Such combined benefits attract substantial weight, particularly in the scenario whereby the Council is not only unable to demonstrate a 5-year HLS but that the deficit concerned is significant.” (my emphasis).*

- 9.7. As demonstrated in my analysis of affordable housing delivery in there has been a continued failure to meet affordable housing needs in the District since this appeal decision, therefore, the provision of 30 affordable homes does contribute to much needed demand for affordable homes in the District.
- 9.8. However, the report does accurately identify that there is a pressing need to increase the supply of homes, and I agree the delivery of homes should be afforded substantial weight.

#### **Ashfield District Council Statement of Case**

- 9.9. The Council submitted their Statement of Case (“SoC”) in respect of the appeal proposals to the Inspectorate in October 2024 which can be viewed under **CD 9.3**.

- 9.10. The Council's SoC states that if the appeal against non-determination had not been made the Planning Committee would have been minded to refuse the application. None of the five reasons listed in paragraph 1.3 relate to affordable housing, which are listed below:

*Reason 1*

*The site is not a sustainable location for further residential development by virtue of the limited public transport opportunities and the need to travel by car to access higher level services. The development would therefore be contrary to Policy ST1 of the Ashfield Local Plan Review 2002 and the aims and objectives of the National Planning Policy Framework (2023).*

*Reason 2*

*The proposed development would result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the National Planning Policy Framework (2023).*

*Reason 3*

*The proposed development would have an adverse impact on the character and appearance of the open countryside. The development is therefore contrary to Policy ST1 of the Ashfield Local Plan Review 2002 and objectives of the National Planning Policy Framework (2023).*

*Reason 4*

*Insufficient information has been provided to demonstrate that the development proposed would be suitable to provide a residential use taking account of ground conditions and risks arising from contamination. The development is therefore contrary to paragraphs 180c) and 189 of the National Planning Policy Framework (2023).*

*Reason 5*

*Insufficient information has been provided to fully assess the impact upon the local highway network. In particular there is insufficient information on the impact of the development having regard to its proximity to the existing the level crossing and the implications when the crossing gates are closed during peak times. Consequently, this lack of information means that it has not been demonstrated that the proposal would not have a severe impact upon the highway, which would be contrary to Policy ST1 of the Ashfield Local Plan Review 2002 and paragraph 115 of the NPPF.*

- 9.11. The SoC does not provide any further commentary on the need for affordable housing in the District. However, under paragraph 6.21 it accepts that the appeal scheme's contribution towards market and affordable housing supply is a benefit. The SoC does not set out the weight attributed to this benefit and states in paragraph 6.22 that the Council will outline the weight to be attributed to each benefit in their evidence.

### **Summary and Conclusions**

- 9.12. I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.
- 9.13. The acute level of affordable housing need in Ashfield District, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can.
- 9.14. In my opinion, the Council have deliberately sought to downplay the provision of up to 30 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **substantial weight** in the determination of this appeal.

# Benefits of the Proposed Affordable Housing at the Appeal Site

---

## Section 10

### Introduction

- 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. Ashfield District is no exception to this.
- 10.3 The appeal scheme will provide up to 30 affordable dwellings on site comprising 75% affordable rent (23 units) and 25% shared ownership (7 units). The wider social and economic benefits of affordable housing per se are commonly recognised.
- 10.4 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

### Benefits of Providing Affordable Housing

- 10.5 In February 2024 new research titled “The economic impact of building social housing” carried out by the Centre for Economics and Business Research (“CEBR”) **CD 15.11** on behalf of Shelter and the NHF was published.
- 10.6 This research is the first to evidence the substantial economic and social benefits of building 90,000 new social rented homes – the figure that needs to be built each year to fix the housing crisis and help end homelessness.
- 10.7 The report demonstrated that building 90,000 social homes provides both immediate and long-term value for money for the government and the economy. It would directly support nearly 140,000 jobs in the first year alone.
- 10.8 Within three years, the wider economic benefits of building the homes would break even and return an impressive £37.8bn back to the economy, largely by boosting the construction industry.

10.9 Alongside this, the new social homes would generate huge savings for the taxpayer across multiple departments. These breakdown as follows:

- £4.5bn savings on housing benefit
- £2.5bn income from construction taxes
- £3.8bn income from employment taxes
- £5.2bn savings to the NHS
- £4.5bn savings from reduction in homelessness
- £3.3bn savings to Universal Credit

10.10 The report demonstrates that there are tangible solutions to the housing crisis and homelessness that not only benefit individuals and communities but also provide significant economic advantages to Councils and the wider economy.

10.11 By investing in the construction of 90,000 new social rented homes annually, policymakers could address pressing social issues while simultaneously stimulating job growth, bolstering tax revenues, and reducing the strain on public services. This comprehensive approach not only addresses immediate housing needs but also lays the foundation for long-term economic resilience and prosperity.

#### **Benefits of the proposed Affordable Housing at the appeal site**

10.12 The development exceeds (10%) the requirements of Policy HG4 of the Local Plan (6%). It should be noted that affordable housing strategies and policies were drafted to capture a benefit rather than to ward off harm or be needed in mitigation.

10.13 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD 7.18**) in September 2018 who was clear at paragraph 72 of their decision that:

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



10.14 Similarly, as recognised in a recent appeal decision in at Coombebury Cottage, Dunsfold (CD 7.19, p.8, [48]):

*“the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs.”*

The benefits of the proposed affordable homes at the appeal site should therefore be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.

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

- i. Exceeding current local plan Policy requirements (6%) and meeting the requirements of the Ashfield Affordable Housing Delivery Strategy 2019-2021 with an offer of 10% (up to 30 dwellings) of the scheme provided as affordable housing;
- ii. An addition of up to 23 affordable rent homes;
- iii. An addition of up to 7 shared ownership homes;
- iv. A deliverable scheme which provides much needed affordable homes;
- v. In a sustainable location;
- vi. Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation<sup>23</sup>; and
- vii. Greater security of tenure than the private rented sector.

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

### **Summary and Conclusions**

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

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

---

<sup>23</sup> Watt a Save by HBF – October 2022.

10.19 In my opinion, the Council have deliberately sought to downplay the provision of up to 30 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **substantial weight** in the determination of this appeal.

# The Weight to be Attributed to the Proposed Affordable Housing Provision

---

## Section 11

- 11.1 The NPPF is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 11.2 Paragraph 61 of the NPPF sets out the Governments clear objective of “*significantly boosting the supply of homes*” with paragraph 62 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 (**CD 7.20**).
- 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 (**CD 7.21**). 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, 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 (**CD 7.22**). 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 30 homes here will not describe their needs as generic.

11.10 Considering the authority's past poor and lamentable record of affordable housing delivery, high and rising numbers of households on then housing register, there can be no doubt in my mind that the provision of up to 30 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 JS4**.

11.13 Furthermore, brief summaries of appeal decisions relevant to this appeal are summarised below.

Land off Ashland Road West, Sutton in Ashfield (Appeal Ref: APP/W3005/W/21/3274818) (CD 7.7)

11.14 As previously mentioned at paragraph 9.6 a significant appeal decision which is particularly relevant due to it being in the same Local Authority is the appeal at Sutton in Ashfield decided in December 2021. This scheme also proposed a 10% provision of affordable housing and much like the appeal scheme proposed up to 300 new dwellings. The inspector at paragraph 72 states that *"in respect of the proposed provision for affordable housing, this would represent a benefit of the development, weighing in its favour"*. It also highlighted the need for affordable housing in the District and attached substantial weight to the provision of affordable housing. At Paragraph 85 the inspector states the following:

*"Having regard to the Government's objective of significantly boosting the supply of homes, the proposed development would have the benefit of contributing up to 300 dwellings towards the supply of housing in the District. Of those dwellings, the proposed 10% contribution to the local supply of affordable housing would be an added benefit, particularly due to the likely numbers involved and the clear need for such housing in the District. Such combined benefits attract substantial weight, particularly in the scenario whereby the Council is not only unable to demonstrate a 5-year HLS but that the deficit concerned is significant."* (my emphasis).

Land at Deerlands Road, Wingerworth (Appeal Ref: APP/R1038/W/17/3192255 (CD 7.23)

- 11.15 Much like the appeal site where there was a significant need for affordable housing an appeal at Wingerworth in North East Derbyshire District decided in November 2018, stated the following regarding the provision of affordable housing in paragraph 54 where very significant weight as attributed to affordable housing provision:

*“the provision of 40% affordable housing in the appeal scheme is a benefit. This is a very significant material consideration weighing in favour of the appeal scheme”.*

Land east of Park Lane, Coalpit Heath, South Gloucestershire (Appeal Ref: APP/P0119/W/17/3191477) (CD 7.24)

- 11.16 This is also acknowledged by the Inspector in an appeal decision at Coalpit Heath, South Gloucestershire (see paragraph 61):

*“There are three different components of housing that would be delivered: market housing, affordable housing (AH) and custom-build housing (CBH). They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply. The fact that the much-needed AH and CBH are elements that are no more than required by policy is irrelevant – they would still comprise significant social benefits that merit substantial weight”.* (My emphasis).

Land South of (East of Griffin Place) Radwinter Road, Saffron Waldon (Appeal Ref: APP/C1570/W/22/3296426) (CD 7.25)

- 11.17 This appeal for 233 dwelling including 40% affordable, also attracted substantial weight, under paragraph 68 the inspector states the following:

*“Turning to consider the benefits of the proposal, there is a general imperative to boost the supply of housing land. The delivery of dwellings in an authority which does not have a 5 year supply of housing sites attracts substantial weight. In addition, the proposal would provide 40% affordable housing as well as 5% custom build housing. The delivery of affordable housing would accord with the objectives of policy H9 of the UDLP. Based on the evidence I heard in relation to this matter, in a district where there is a clear need for such provision to be made, these factors also attract substantial weight.”*

Land at Junction with Carr Road and Hollin Busk Lane, Sheffield (Appeal Ref: APP/J4423/W/21/3267168) (CD 7.26)

11.18 Finally, this appeal for 85 units where 10% of the total GIA as affordable was allowed with substantial weight attached to affordable housing, under paragraph 147 the Inspector states the following:

*“The proposal would deliver a number of benefits. The Framework emphasises the importance of delivery of housing and the provision of up to 85 new homes will contribute to meeting the current shortfall that I have identified above. This requires me to attach substantial weight to the provision of market housing. Of those new homes, at least 10% GIA of the total GIA of all dwellings would be affordable housing, for which there is an undisputed need both locally and nationally. Such benefit would be consistent with the social dimension of sustainable development and is also a substantial benefit to be weighed in the planning balance.”*

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

- i. Affordable housing is an important material consideration;
- ii. The importance of unmet need for affordable housing being met immediately;
- iii. Planning Inspectors and the Secretary of State have attached substantial weight to the provision of affordable housing; and
- iv. 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**

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

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

11.22 Market signals indicate a worsening trend in affordability across Ashfield District 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.

11.23 Against the scale of unmet need and the lack of suitable alternatives in the private rented sector across Ashfield District, there is no doubt in my mind that the provision of up to 30 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.



# Appendix JS1

---

FOI Correspondence dated September 2024

