

# Affordable Housing Update Statement

Nutfield Green Park, Nutfield, Surrey

# Affordable Housing Update Statement

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

Nutfield Green Park, Nutfield, Surrey

Nutfield Park (Developments) Ltd

August 2025

OUR REF: M22/0514-08.RPT

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## Appendices

Appendix TKP1 Council's FOI response 7 August 2025

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# Introduction

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## Section 1

- 1.1 This Affordable Housing Statement is prepared by **Tetlow King Planning** ("TKP") on behalf of **Nutfield Park (Developments) Ltd**. It examines the need for affordable housing in the Tandridge District Council administrative area (where the application site is located), as well as the local need for affordable housing in Bletchingley & Nutfield Ward, and the Tandridge 008 MSOA.
- 1.2 Outline planning permission is sought for '*the development of the site for new homes (Use Class C3) and Integrated Retirement Community (Use Classes C2, E(e), F2), creation of new access, landscaping and associated works to facilitate the development, in phases which are severable (Outline with all matters reserved, except for Access).*'
- 1.3 The proposed development includes 50% on site affordable housing provision, which exceeds the requirements of Policy CSP4 of the Core Strategy 2006-2026 (adopted October 2008). Further, the proposed development is consistent with the 'Golden Rules' for development in the Green Belt set out by paragraphs 155 to 157 of the NPPF.
- 1.4 The proposed tenure split will be determined at reserved matters stage but will reflect the requirements of relevant local and national policy and guidance adopted at that time. The proposed affordable housing will be secured by way of a section 106 planning obligation.
- 1.5 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government.
- 1.6 This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), and recent Written Ministerial Statements which acknowledge the need to address an "*acute and entrenched housing crisis*".
- 1.7 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

- 1.8 This Affordable Housing Statement considers the need for affordable housing and the contribution that the proposed development can make towards meeting the affordable housing needs of the Tandridge District Council administrative area and of Betchingley & Nutfield Ward.
- 1.9 It also takes account of a range of affordable housing indicators as well as consideration of national planning policy, performance against plan requirements, affordability issues, and the Council's own corporate objectives.
- 1.10 It concludes that there is a genuine and acute need for the proposed affordable homes now, and that **very substantial positive weight** should be attributed to the provision of affordable housing at the application site in the planning balance.
- 1.11 In undertaking this work, reliance has been placed upon data obtained through a Freedom of Information ("FOI") request to which the Council responded on 5 August 2025. The FOI request is included at **Appendix TKP1** to this Statement.
- 1.12 This statement comprises the following five sections:
  - Section 2 reviews relevant Development Plan policies and other material considerations relevant to the site;
  - Section 3 provides analysis of affordable housing needs;
  - Section 4 examines past affordable housing delivery;
  - Section 5 identifies a range of affordability indicators; and
  - Section 6 sets out our conclusions and recommendations.

# The Development Plan and Related Policies

## Section 2

### Introduction

- 2.1 In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 2.2 The relevant Development Plan in respect of affordable housing for the application site currently comprises the Tandridge District Core Strategy 2006-2026 (adopted 2008) and the Tandridge Local Plan (Part 2) Detailed Policies 2014-2029 (adopted 2014).
- 2.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the PPG (March 2014, ongoing updates), and a number of corporate documents which support the provision of affordable housing at the corporate level.

### The Development Plan

#### **Tandridge District Core Strategy 2006-2026 (adopted 2008)**

- 2.4 The Tandridge District Core Strategy (the 'Core Strategy') was adopted in October 2008 and covers the period between 2008/09 and 2025/26. Core Strategy shows how housing will be delivered over a fifteen-year period from its start.
- 2.5 Chapter two of the Core Strategy outlines the profile of the district. Paragraph 2.11 (page 3) that at the time of writing '*Tandridge is one of the most expensive local authority areas in the country for housing, it is also important to note that house prices within Tandridge have risen dramatically in recent years. ... Due to high house prices in the District, affordability is a major issue;*'
- 2.6 Chapter two concludes with paragraph 2.13 (page 3) stating the following:  
  
*'house prices have risen to very high levels leading to an increased gap between incomes and house prices, this makes it difficult for many people to access the housing market. There is risk of labour supply shortages in particular sectors with some people being unable to afford to live in the District [emphasis added].'*

- 2.7 Chapter 3 sets out the key challenges facing the District which the Core Strategy seeks to address. Issue 4 relates to housing states that '*providing adequate housing in terms of quantity, type and affordability is essential. The inability of households to have a home of their own is unacceptable ... Affordability is a big issue with many people being unable to access market housing. ... and may have impacts on the economy if businesses are unable to recruit staff because they cannot afford to live in the District.*'
- 2.8 Chapter 4 (Vision for Tomorrow's Tandridge) includes the Council's vision for the District to be delivered by the policies of the Core Strategy. These include (page 10) '*adequate housing, ... meet the needs of all sections of the community.*'
- 2.9 Paragraphs 4.2 (page 10) introduces the Tandridge Community Strategy 2006-2011, which was prepared by the Local Strategic Partnership comprising members of the public, volunteers, and other stakeholders from across Surrey. It goes on to note that the visions are different but compatible.
- 2.10 Paragraph 4.3 (page 10) states that the Core Strategy will seek to support the Tandridge Community Strategy by '*Supplying Affordable Housing*' alongside commitments to other elements of the Strategy.
- 2.11 This is reflected in Objective 1 (Social Progress) of the Core Strategy (page 11) through its inclusion of '*Provision of sufficient and adequate housing ...to meet the needs of all sections of the community, including affordable dwellings...*'
- 2.12 Chapter 8 (Housing Need and Balance) notes (page 22) that an Affordable Housing Development Plan Document ('DPD') will be prepared to supplement the policies of the Core Strategy and will be informed by additional evidence on the viability of affordable housing to ensure that it can be delivered.
- 2.13 This reflects the concerns raised in the Inspector's Report on the Examination of the Core Strategy (2008). Paragraph 9.5 of which (page 19) expressly notes:
 

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

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

2.15 Paragraph 8.3 goes on to comment on the findings of its evidence base<sup>0F1</sup> which '*show that there is a very high level of unmet housing need within the District ... This level of need justifies the Council seeking to maximise the supply of affordable housing from all possible sources, but particularly through the planning system which is the principal means of delivery at the present time [emphasis added].*'

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

2.17 Policy CSP4 states the following.

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

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

2.18 An overall policy target of 50 affordable completions per annum is set for the five-year period from 2007 to 2012. With paragraph 8.4 (page 22) of the supporting text clarifying that the details of how the target was set being set out in the Affordable Housing Technical Paper.<sup>1F2</sup>

2.19 Within Policy CSP4 the Council may require up to 75% of the affordable housing on a site to be social rented, the precise proportions will be agreed having regard to the specific need at the time and within the area.

<sup>1</sup> Specifically, it refers to the Housing Needs Study (2005) and the East Surrey Strategic Housing Market Assessment (2007).

<sup>2</sup> The target of 50 affordable homes per years is just 7% of the 720 affordable homes per year identified as needed by the 2008 SHMA. The Affordable Housing Technical Paper referred to by paragraph 8.3 is not currently available on the Council's website.

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

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

### **Other material considerations**

#### **Emerging Development Plan**

2.21 The draft Tandridge Local Plan 'Our Local Plan: 2033' was submitted for examination on 18 January 2019. During the course of examination, the Inspector concluded that the plan was not capable of being made sound and on 14 February 2024 formally advised of this finding. Following this, the Full Council resolved on 18 April 2024 to withdraw the 'Our Local Plan 2033' from examination and prepare a revised new Local Plan.

2.22 Work on the new Local Plan remains at an early stage and is currently preparing a new evidence base with documents for consultation to follow. The Local Development Scheme (February 2025) notes that a Housing and Economic Development Assessment is being prepared but has not yet been published.

2.23 Consequently, there is neither a published draft of the Emerging Local Plan nor has any relevant new documents been published as part of the evidence base to the new Emerging Local Plan.

#### **Corporate Documents**

2.24 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority of Tandridge District Council. These include the following documents:

- Corporate Plan 2024 to 2028;
- Tandridge Housing Strategy 2019-2023; and
- Tandridge Homelessness Prevention and Rough Sleeping Strategy 2019-2023 (extended to 2025).

## **Summary and Conclusions**

- 2.25 The relevant Development Plan in respect of affordable housing for Tandridge District Council currently comprises the Core Strategy and LPP2.
- 2.26 The evidence set out in this section clearly highlights that within adopted policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Tandridge District Council.
- 2.27 The application proposals provide an affordable housing contribution which exceeds requirements of Core Strategy Policy CSP4.
- 2.28 The up to 103<sup>3</sup> affordable homes at the application site will make a significant contribution towards the annual affordable housing needs of the district, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 4 of this Statement.

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<sup>3</sup> The development consists of up to 166 dwellings and 41 later living units 50% of which will be affordable, or up to 83 affordable homes and up to 20 affordable homes from each respectively.

# Affordable Housing Needs

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## Section 3

### Introduction

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

### The Development Plan

3.2 Policy CSP4 of the Core Strategy 2006 to 2026 includes a target of 50 affordable homes per annum for the period between 2007 and 2012, but this should be understood in the context of the period in question having ended more than thirteen years ago and the wider comments set out in paragraph 2.18 of this Statement.

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

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

### Housing Market Assessments

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

#### East Surrey Strategic Housing Market Assessment 2008

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

3.7 The 2008 SHMA concluded that there is a **need for 720 affordable dwellings per annum between 2008/09 and 2012/13.**

Affordable Housing Needs Assessment 2015

3.8 The Affordable Housing Needs Assessment Technical Paper ('2015 AHNA') was published September 2015. The 2015 AHNA covers the period 2015/16 to 2019/20.

3.9 It is important to highlight this assessment of need has been tested at Examination in Public as of the examination of the Local Plan 2033, but this should be understood in the context of that plan being found unsound and withdrawn from examination. Considered further in relation to the 2018 AHNA.

3.10 The 2015 AHNA concluded that there is a **need for 456 affordable dwellings per annum between 2015/16 and 2019/20.**

Affordable Housing Needs Assessment 2018

3.11 The Affordable Housing Needs Assessment Updated Technical Paper ("2018 AHNA") was published in June 2018. The 2018 AHNA is an update to the 2015 AHNA which previously formed part of the Council's SHMA evidence base.

3.12 The **2018 AHNA concluded that there is a need for 391 affordable dwellings per annum between 2018/19 and 2022/23, falling to 310 affordable homes per annum for the period between 2023/24 and 2038/39.** For the purposes of TKP's subsequent analysis this need figure is relied upon as it's the most up to date assessment of affordable housing need within Tandridge District.

3.13 The 2018 AHNA provides an updated calculation of affordable housing needs, which fully updates and therefore supersedes the calculation presented in the previous 2015 AHNA. It was prepared in part to respond to the Inspector of the 2033 Local Plan requests for updates to the submitted evidence base.

3.14 Notwithstanding, the Inspector's principal reason for finding the plan unsound was the lack of an up-to-date evidence base. The Inspector's letter to the Council concludes in paragraph 110 (page 28) as follows:

*'The Plan is not based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. It is not, therefore, sound as it is not consistent with national policy, justified or effective, and I am not able to make it sound by main modifications for the reasons explained above.'*

- 3.15 The 2018 AHNA preceded the 2018 NPPF which introduced the wider definition of affordable housing that remains the definition in the current NPPF. The 2018 AHNA does not reflect the full range of affordable housing needs recognised by the NPPF.
- 3.16 Therefore, the 2018 AHNA is likely to underestimate the level of affordable housing need in the District if the full range of affordable housing needs recognised by the current NPPF were to be considered.
- 3.17 For example, an increase in affordable housing need from the Darlington 2015 SHMA (**Appendix TKP2**) was identified in the Darlington 2020 SHMA by consultants ORS (the authors of both assessments). Paragraph 3.70 of the 2020 SHMA recognised that:
 

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

### **Local Housing Need vs Affordable Housing Need**

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

*'The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes [emphasis added].'*<sup>4</sup>

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<sup>4</sup> Paragraph: 006 Reference ID: 2a-006-20190220

3.20 Providing an affordability adjustment in the calculation of local housing need to reflect disparities in the affordability of homes in an authority, is not the same as calculating a figure for number of affordable homes needed in that authority. The affordability uplift is simply a function within the standard method for calculating local housing need; it is not a basis for determining the numerical need for affordable housing nor the types of affordable housing required as defined in Annex 2 of the NPPF (December 2024).

3.21 This is further supported by the calculation of such need in an authority is considered under a separate section of the PPG entitled '*How is the total annual need for affordable housing calculated?*' which clearly sets out that:

*'The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.'*<sup>5</sup>

3.22 The NPPF is clear, at paragraph 63, that:

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

3.23 Whilst the Standard Method calculation may be appropriate for monitoring general housing needs and supply across the Authority, it does not provide a need figure for affordable housing in line with the PPG. As such, it does not reflect affordable housing need; nor is it an appropriate basis with which to monitor affordable housing supply.

3.24 In a similar fashion, the achievement of Housing Delivery Test targets does not signify that affordable housing needs have been being met over a period when using the standard method to calculate the 'number of homes required' for a Local Authority area.

### **Summary and Conclusions**

3.25 There is a clear need for affordable housing in Tandridge and whilst a numerical target of 50 affordable homes is provided for the period between 2007 and 2012, but no numerical target is provided for the subsequent monitoring years of the plan period.

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<sup>5</sup> Paragraph: 024 Reference ID: 2a-024-20190220

- 3.26 The 2008 SHMA identifies a need for 720 affordable homes per annum between 2008/09 and 2012/13.
- 3.27 The 2015 AHNA identifies a need for 456 affordable homes per annum between 2015/16 and 2019/20.
- 3.28 The 2018 AHNA identifies a need for 391 affordable homes per annum between 2015/16 and 2019/20 to meet the 'backlog' of need in five years, which falls to 310 affordable homes per annum for period between 2023/24 and 2038/39.
- 3.29 The 2018 AHNA is the most recent assessment of affordable housing need in the district and is that principally relied on by this Statement. However, as detailed above, the 2018 AHNA is not consistent with the NPPF and is now almost ten years old. Importantly, it will not take account of the most version definition of affordable housing as contained in the NPPF, which now includes a much broader spectrum of households that all into need. Moreover, it was prepared as part of the evidence base to the now withdrawn emerging Local Plan 2033; the having been withdrawn following the Inspector's finding, *inter alia*, during its examination that it was not supported by an up-to-date or robust evidence base.
- 3.30 Whilst the 2018 AHNA is the most recent assessment of affordable housing need in the district it is, for the reasons outlined, it is likely to underestimate the actual level of affordable housing need and was not considered to be sufficiently up-to-date or robust at examination. The 2018 AHNA and its findings should be understood in, and afforded weight proportionate to this context.

# Affordable Housing Delivery

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## Section 4

### **Introduction**

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

### **Past Affordable Housing Delivery**

4.2 Figure 4.1 illustrates the delivery of affordable housing (“AH”) in Tandridge since the start of the Core Strategy period in 2008/09.

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

Figure 4.1: Gross Additions to Affordable Housing Stock, 2008/09 to 2023/24

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2008/09	297	37	12%
2009/10	172	27	16%
2010/11	132	54	41%
2011/12	261	60	23%
2012/13	221	43	19%
2013/14	256	57	22%
2014/15	142	60	42%
2015/16	322	12	4%
2016/17	228	85	37%
2017/18	332	76	23%
2018/19	244	75	31%
2019/20	262	121	46%
2020/21	117	31	26%
2021/22	238	59	25%
2022/23	303	60	20%
2023/24	238	77	32%
<b>Totals</b>	<b>3,527</b>	<b>857</b>	<b>24%</b>
<b>Avg. Pa.</b>	<b>220</b>	<b>54</b>	

Source: Freedom of Information Response 5 August 2025.

- 4.3 Between 2008/09 and 2023/24, a total of 3,527 dwellings were delivered in Tandridge, equivalent to 220 per annum. Of these, 857 dwellings were affordable tenures, equivalent to 54 per annum. This equates to 24% gross affordable housing delivery.
- 4.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy ("RtB") sales from existing Council and Registered Provider ("RP") affordable housing stock.
- 4.5 At a national level over two million households have exercised their Right to Buy since it was introduced in 1980. In her Written Ministerial Statement of 30 July 2024, the incoming Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:

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

4.6 Figure 4.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy period in 2008/09, net of Right to Buy sales. A net loss of 1214<sup>F</sup><sup>6</sup> affordable dwellings over this period equates to 14% of the gross affordable housing completions of 3,527 affordable dwellings over the 16-year period.

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

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<sup>6</sup>  $(121 + 5) - 5 = 121$  dwellings.

Figure 4.2: Net of Right to Buy Additions to Affordable Housing Stock, 2008/09 to 2023/24.

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	LPA Acquisitions	LPA RtB sales	RP RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	A	B	C	D	E	F (B + C) - (D + E)	G (F / A) X 100
2008/09	297	37		4		33	11%
2009/10	172	27		1		26	15%
2010/11	132	54		2		52	39%
2011/12	261	60	0	4	0	56	21%
2012/13	221	43	0	11	0	32	14%
2013/14	256	57	0	15	0	42	16%
2014/15	142	60	3	7	3	53	37%
2015/16	322	12	1	21	1	-9	-3%
2016/17	228	85	0	10	0	75	33%
2017/18	332	76	0	8	0	68	20%
2018/19	244	75	0	11	0	64	26%
2019/20	262	121	1	6	1	115	44%
2020/21	117	31	0	11	0	20	17%
2021/22	238	59	0	8	0	51	21%
2022/23	303	60	0	2	0	58	19%
2023/24	238	77	0	4	0	73	31%
<b>Total</b>	<b>3,527</b>	<b>857</b>	<b>5</b>	<b>121</b>	<b>5</b>	<b>736</b>	<b>21%</b>
<b>Avg. Pa.</b>	<b>220</b>	<b>54</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>46</b>	<b>21%</b>

Source: FOI Response 5 August 2025 and MHCLG data.

4.7 Figure 4.2 demonstrates that on average between 2008/09 and 2023/24, the Council has added just 736 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 21% of the total average number of net housing completions. This figure is likely to fall even further if demolitions to existing stocks were to be accounted for.

4.8 It should be emphasised that in the period between 2008/09 and 2012/13, net of the Right to Buy, on average 40 affordable homes were completed per annum<sup>5F<sup>7</sup></sup>; the gross completion figure for the same period was 446<sup>F<sup>8</sup></sup> affordable homes per annum. This means that both net and gross affordable housing completions were below the 50 affordable homes per annum target for this period.

4.9 As detailed in sections 2 and 3 of this Statement, the target of 50 affordable homes year is just 7% of the 720 affordable homes per year identified by the 2008 SHMA as needed for the period. Consequently, the failure to deliver sufficient affordable homes to meet a target that itself is more than an order of magnitude below the level of need is an astonishing level of under delivery.

4.10 Notwithstanding, the above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Tandridge faster than the replacements from acquisitions.

4.11 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal at land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019 (**Appendix TKP3**). Paragraph 14.108 of the Inspector's Report sets out that:

*“Mr Stacey’s unchallenged evidence shows that only 2,757 new affordable homes were provided in the City over the first 6 years of the plan period. This represents less than half of the target provision and a net increase of only 151 affordable homes if Right to Buy sales are taken into account. On either measure there has been a very low level of provision against a background of a pressing and growing need for new affordable homes in Birmingham [emphasis added]”.*

4.12 This was later endorsed by the Secretary of State who stated that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.

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<sup>7</sup> 199/5 = 39.8 (rounded to 40).

<sup>8</sup> 221/5 = 44.2 (rounded to 44).

4.13 The seriousness of the impact was considered in an article in the Independent newspaper in June 2020 which is attached at **Appendix TKP4**.

4.14 The article reports that “*Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show*”. It goes on to discuss the national picture, explaining that “*Housing charities warned that enough “desperately needed” genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show*”.

4.15 The article goes on to quote Jon Sparkes, who was the chief executive at homelessness charity Crisis at the time. He remarked that “*These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision.*”

4.16 The article also notes that a significant proportion of homes sold under the Right to Buy (for instance, around 40% of apartments) have gone on to be let in the private rented sector – in other words, what was once affordable housing is now being let out at full market rates. The article notes that “*Previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London*”.

4.17 It is important, therefore, that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account to reflect the actual level of affordable houses available.

4.18 The comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

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

4.19 Figure 4.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 456 net affordable dwellings per annum between 2015/16 and 2019/20, as set out in the 2015 AHNA.

*Figure 4.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2015 AHNA, 2015/16 to 2019/20*

Monitoring Year	Additions to AH Stock (Net of RtB)	2015 AHNA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2015/16	-9	456	-465	-465	-9
2016/17	75	456	-381	-846	75
2017/18	68	456	-388	-1,234	68
2018/19	64	456	-392	-1,626	64
2019/20	115	456	-341	-1,967	115
<b>Total</b>	<b>313</b>	<b>2,280</b>	<b>-1,967</b>		<b>14%</b>
<b>Avg. Pa</b>	<b>63</b>	<b>456</b>	<b>-393</b>		

Source: 2015 AHNA

4.20 Since the start of the 2015 AHNA period in 2015/16 affordable housing completions (net of Right to Buy) have averaged just 63 net affordable dwellings per annum, against a need of 456 net affordable dwellings per annum. A shortfall of 1,967 affordable dwellings has arisen over the five-year period, equivalent to an average annual shortfall of 393 affordable dwellings.

4.21 Figure 4.4 sets out affordable housing delivery, net of the Right to Buy, compared to the affordable housing need of 391 dwellings per annum between 2018/19 and 2022/23, falling to 310 affordable homes per annum from 2023/24, identified by the 2018 AHNA.

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

*Figure 4.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2018 AHNA, 2018/19 to 2023/24*

Monitoring Year	Additions to AH Stock (Net of RtB)	2015 AHNA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2018/19	64	391	-327	-327	16%
2019/20	115	391	-276	-603	29%
2020/21	20	391	-371	-974	5%
2021/22	51	391	-340	-1,314	13%
2022/23	58	391	-333	-1,647	15%
2023/24	73	310	-237	-1,884	24%
<b>Total</b>	<b>381</b>	<b>2,265</b>	<b>-1,884</b>		<b>17%</b>
<b>Avg. Pa</b>	<b>64</b>	<b>378</b>	<b>-145</b>		

Source: 2018 AHNA

4.22 Since the start of the 2018 AHNA period in 2018/19 affordable housing completions (net of Right to Buy) have averaged just 64 net affordable dwellings per annum, against an average net need for 3787<sup>F9</sup> affordable homes per annum over the same period. A shortfall of 1,884 affordable dwellings has arisen over the six-year period, equivalent to an average annual shortfall of 145 affordable dwellings.

4.23 It bears reiteration that neither the 2015 AHNA nor the 2018 AHNA reflect the current definition of affordable housing. Consequently, the shortfalls illustrated by Figures 4.3 and 4.4 would be greater still were they to include the full range of affordable housing need recognised by the NPPF.

4.24 Section 2 of this Statement highlighted that the Core Strategy's vision includes delivering more affordable housing to support the goals of the Community Strategy along with the Council's own objectives for the District.

4.25 This section has demonstrated that affordable housing delivery in Tandridge has fallen short of that required to meet the need for affordable housing identified by every assessment of since the start of the Core Strategy period.

<sup>9</sup>  $((391*5) + 310)/6 = 378$ .

4.26 Affordable housing delivery has been below even the 50 affordable homes per annum set as a target between 2008/09 and 2012/13 by the Core Strategy. By any measure the Core Strategy has failed to deliver on its objectives or those of the Community Strategy.

### **Summary and Conclusions**

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

4.28 In the 16-year period, for which there is data, since the start of the Core Strategy period in 2008/09, net of Right to Buy affordable housing delivery represented just 21% of overall housing delivery, equating to just 46 affordable dwellings per annum.

4.29 This section has highlighted that affordable housing delivery, net of the Right to Buy, has persistently fallen short of the identified need for affordable housing. Moreover, these shortfalls have arisen against a quantum of affordable housing need identified by the 2015 AHNA and the 2018 AHNA which are out of date and fail to reflect the current definition of affordable housing, introduced by the 2018 NPPF –seven years ago.

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

4.31 The 2018 AHNA identifies a need for 2,265 affordable homes between 2018/19 and 2023/24, 391 dwellings per annum over the first five years falling to 310 per annum from 2023/24. Between 2018/19 and 2023/24 just 381 affordable homes, net of the Right to Buy, were delivered; this equates to a shortfall of 1,884 affordable homes over the period.

4.32 The concerns raised about the recency of the assessments of affordable housing need, detailed in sections 2 and 3 of this Statement, were one of the principal reasons for the Inspector during examination to have considered the now withdrawn Emerging Local Plan incapable of being made sound.

4.33 It is in this context that the shortfalls in affordable housing delivery against identified needs should be understood. For this reason, it is Tetlow King Planning's opinion that the identified shortfalls should be considered as conservative figures and that were there to be an up-to-date and NPPF compliant assessment of affordable housing need against which delivery could be measured there is a real prospect that the shortfall would be greater. Clearly, a position substantiated by the findings of the Darlington SHMA, included as Appendix TKP2.

4.34 It is clear that a 'step change' in affordable housing delivery is needed now in Tandridge to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.

4.35 In light of the identified level of need there can be no doubt that the delivery of up to 103<sup>10</sup> affordable dwellings on the proposed site will make an important contribution to the affordable housing needs of Tandridge.

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<sup>10</sup> The development consists of up to 166 dwellings and 41 later living units 50% of which will be affordable, or up to 83 affordable homes and up to 20 affordable homes from each respectively.

# Affordability Indicators

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## Section 5

### Introduction

5.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.

### Housing Register

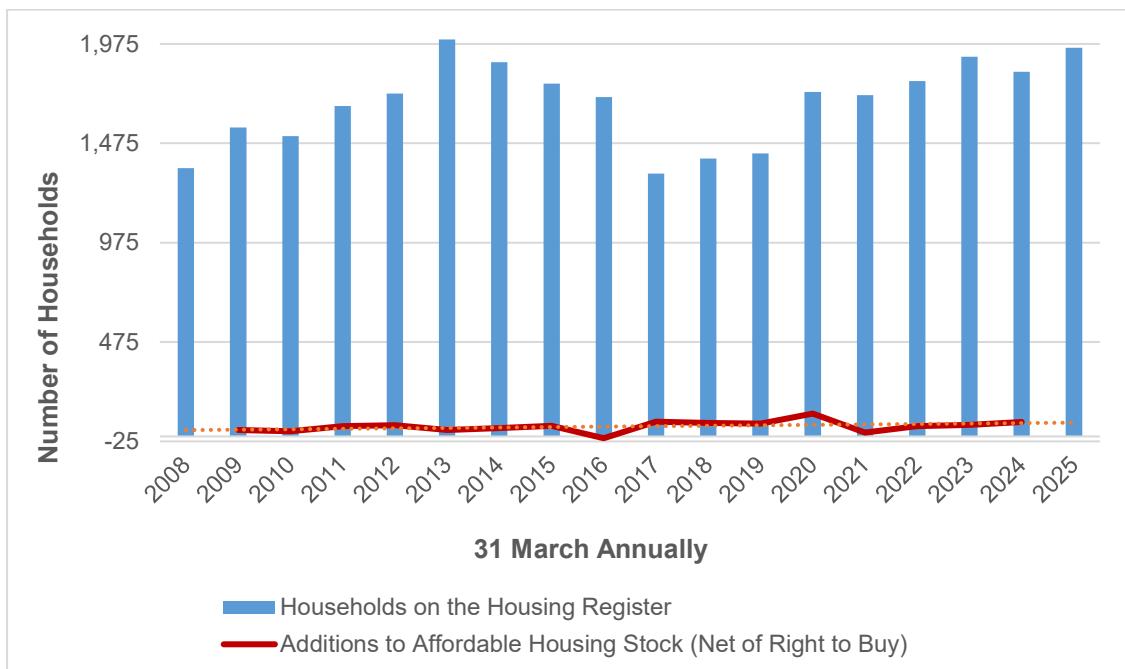
5.2 The Council's Freedom of Information response (**Appendix TKP1**) confirms that on 31 March 2025 there were 1,956 households on the Housing Register. This represents a 7% increase in a single year from 1,835 households, MHCLG data shows on 31 March 2024.

5.3 The Council's FOI response (**Appendix TKP1**) notes that whilst the Council does not require those on the Housing Register to specify a locational preference, 115 registered households indicated they would consider an affordable home in Nutfield; this represents 6% of the total housing register.

5.4 It is not known what proportion of the total number of households on the Housing Register provided any locational information and therefore this figure is considered to represent the minimum number of the registered households that could wish to be housed in Nutfield, if more homes became available.

5.5 Figure 5.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Tandridge since the start of the Core Strategy period in 2008.

*Figure 5.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2008 to 2025*



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

5.6 As Figure 5.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Tandridge since 2008.

5.7 Footnote 4 of MHCLG8F<sup>11</sup> Live Table 600 highlights that:

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

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

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

<sup>11</sup> Ministry of Housing, Communities and Local Government

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

5.11 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.

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

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

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

### **Waiting Times for Housing**

5.15 The Council's Freedom of Information response (**Appendix TKP1**) shows that successful applicants for affordable housing face lengthy and increasing waits for an affordable home in Tandridge.

5.16 Figure 5.2 illustrates that, based on the dwelling size, successful applicants in the 2024/25 period experienced average waiting times ranging from 608 days (approximately 1 year and 8 months) to 1,387 days (approximately 3 years and 10 months) for an affordable home. Notably, no affordable homes with four or more bedrooms were advertised in the 2024/25 monitoring year.

*Figure 5.2: Housing Register Average Waiting Times, March 2025*

Size of Affordable Property	Average Waiting Time to be Housed (31 March 2025) <sup>12</sup>
1-bedroom home	608 days
2-bedroom home	788 days
3-bedroom home	1,387 days
4+ bedroom home	None advertised in the period.

*Source: Freedom of Information response (5 August 2025)*

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

### **Housing Register Bids and Lettings**

5.18 The Council's FOI response (**Appendix TKP1**) confirms that as of 31 March 2025, there were 115 households who specified a preference for an affordable home in Nutfield. This represents 7% of the total Housing Register (1,956 households).

5.19 Figure 5.3 below demonstrates average number of bids per property in Nutfield over the 2024/25 monitoring period for a range of types of affordable property.

<sup>12</sup> The Council's Freedom of Information response provided average waiting times for each property type by Housing Register band, including the percentage of lettings each band represented. The waiting times cited in Figure 5.2 relies on data provided in the FOI response to calculate the average waiting time for each property type across all bands as a weighted total.

Figure 5.3: Bids Per Property in Nutfield, April 2024 to March 2025

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

Source: Freedom of Information response (5 August 2025)

5.20 Figure 5.3 demonstrates that between 1 April 2024 to 31 March 2025 there were an average of 130 bids per 1-bed affordable dwelling put up for let in Nutfield, 203 average bids per 2-bed affordable dwelling and 137 average bids per 3-bed affordable dwelling, and no 4+ bed affordable dwellings were advertised.

5.21 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 Nutfield that is not being met.

### Temporary Accommodation

5.22 MHCLG statutory homelessness data highlights that on 31 March 2024, there were 47 households housed in temporary accommodation by the Council, with 43 (91%) of these households with children.

5.23 The “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” report<sup>10F</sup><sup>13</sup> 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.

5.24 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*”.

<sup>13</sup> [Bleak Houses: Tackling the Crisis of Family Homelessness in England](#).

## Homelessness

5.25 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 170 households in need of homelessness prevention duty<sup>11F</sup><sup>14</sup>, and a further 105 households in need of relief duty<sup>12F</sup><sup>15</sup> from the Council.

5.26 The Tandridge Homelessness Prevention Strategy 2019 to 2023 (extended to 2025) states in paragraphs 1.23 and 1.24 (page 16):

*'1.23 This data on poverty and ill health is significant for this district as housing is very expensive and there is a known acute shortage of affordable housing. ... only one in four households in the district can afford to buy their own home.*

*1.24 ... [for] 44% of households living in the district the cost of renting is unaffordable ...'*

5.27 Paragraph 1.30 notes on the four identified causes of homelessness in the district that '*The first three causes are all symptoms of the acute lack of affordable housing in the district ... [emphasis added]*'

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

## Private Rental Market

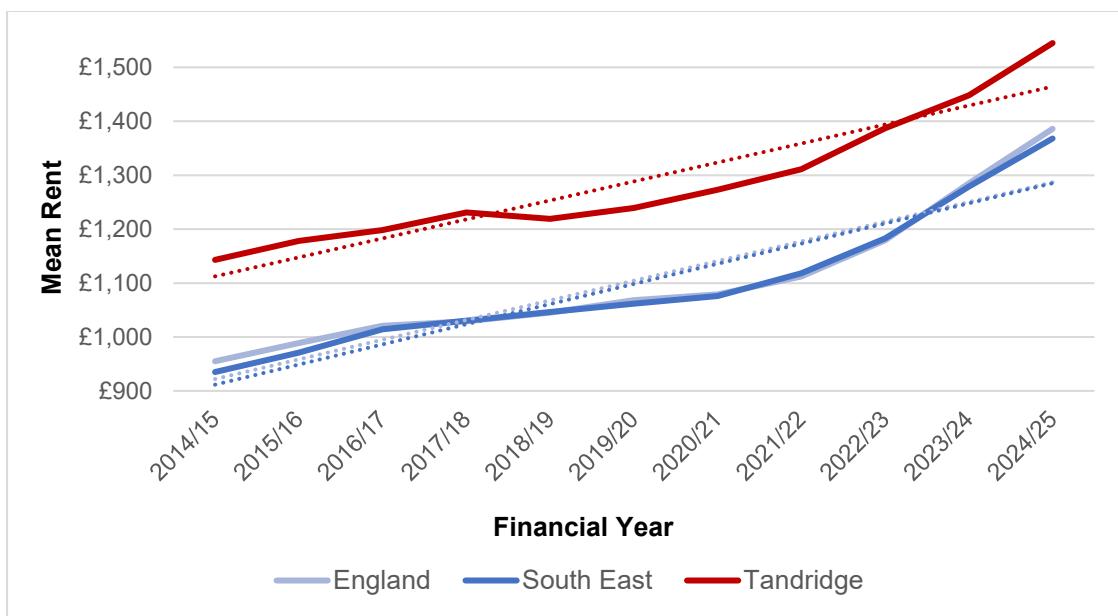
5.29 Office for National Statistics ("ONS") data (first produced in 2014/15) shows that average (mean) private rents in Tandridge stood at £1,545 per calendar month ("pcm") in 2024/25. This represents a 35% increase from 2014/15 where average private rents stood at £1,143 pcm.

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<sup>14</sup> The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

<sup>15</sup> The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

Figure 5.4: Average (Mean) Private Sector Rents, 2014/15 to 2024/25



Source: VOA and ONS.

- 5.30 An average rent of £1,545 pcm in 2024/25 is 13% higher than the South East figure of £1,368 pcm and 11% higher than the national figure of £1,386 pcm.
- 5.31 It is important to note that ONS rental data is calculated using all transaction data, i.e., existing lets as well as new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Tandridge.

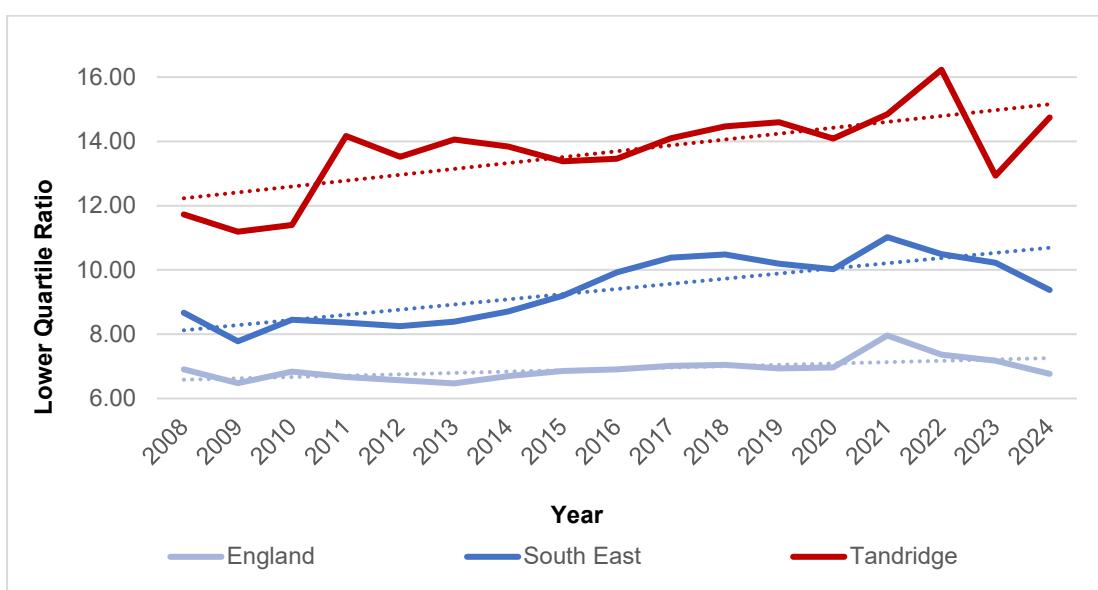
### Lower Quartile House Prices

- 5.32 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in Tandridge in 2024 stood at **14.75**, a 26% increase since the start of the Core Strategy period in 2008 when it stood at 11.73.
- 5.33 Pertinently, the start of the Core Strategy period broadly corresponds with the onset of the 2008 financial crash. This is notable as while the ratio between lower quartile incomes and house prices in England has remained broadly flat since 2008 (-2% over the period), with the exception of a spike in 2021 and 2022 potentially linked to Covid 19 related changes in the housing market, whereas in Tandridge it increased 26%. The increase in the ratio in Tandridge is more than double the increase observed in the South East region as whole (+8%) over the same period.

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

5.35 Once again it remains the case that the ratio in Tandridge stands substantially above the national average of 6.77 (+118%) and significantly above the South East average of 9.38 (+57%). It follows that housing in this area is unaffordable for a significant part of the local population.

*Figure 5.5: Lower Quartile Workplace-Based Affordability Ratio comparison, 2008 to 2024*



Source: ONS.

5.36 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is more than three times (328%) higher than that.

5.37 Crucially, the ratio between lower quartile incomes and house prices in Tandridge increased 14% in the last twelve months, between 2023 and 2024; this stands in stark contrast with the declining ratios in both the South East (-8%) and England (-6%) over the same period.

5.38 Figure 5.5, unfortunately, bears out the concerns of the Core Strategy. As highlighted in section 2 of this Statement, paragraph 2.13 of the Core Strategy observed that:

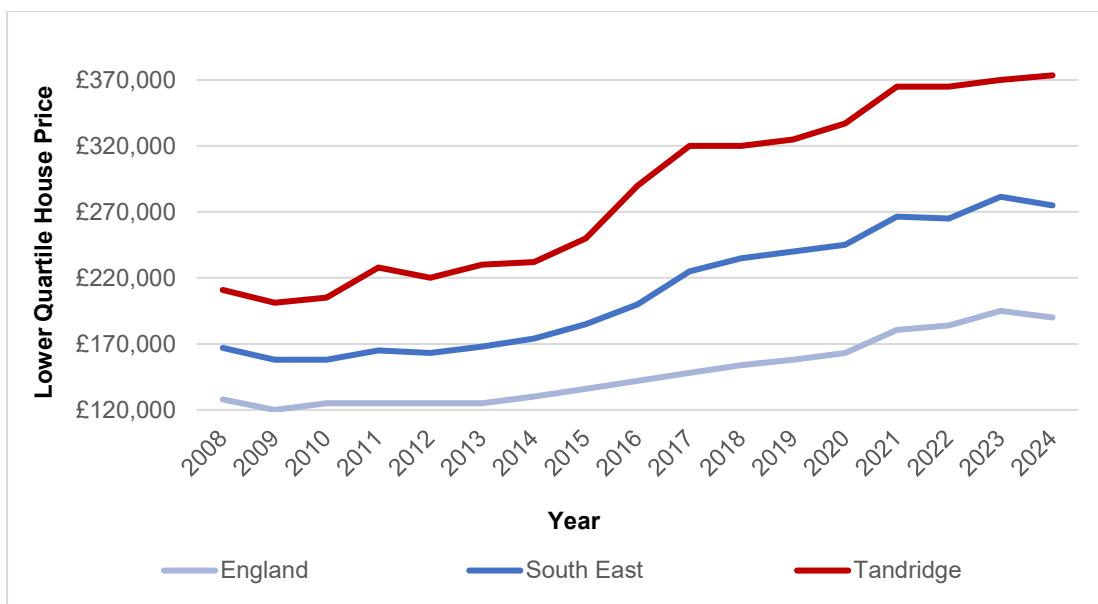
*'house prices have risen to very high levels leading to an increased gap between incomes and house prices, this makes it difficult for many people to access the housing market. There is risk of labour supply shortages in particular sectors with some people being unable to afford to live in the District.'*

5.39 Figure 5.5 illustrates that the ratio between lower quartile incomes and house prices in Tandridge at the start of the Core Strategy period was (11.73) 35% higher than that of the South East (8.67) and 70% higher than that for England (6.91). In 2024 the ratio in Tandridge (14.75) was 57% higher than that in the South East (9.38) and a staggering 118% higher than the rest of England (6.77).

5.40 Clearly, over the Core Strategy period affordability in Tandridge has not only not improved it has worsened dramatically, markedly faster than the rest of the South East and England. Only 30 of the 318 local planning authorities have seen an increase (worsening) in the lower quartile affordability ratio in the last 12 months, **Tandridge saw the largest increase – i.e. Tandridge was top of the authorities where the affordability of housing has worsened.**

5.41 Figure 5.6 illustrates the lower quartile house sale prices for England, South East, and Tandridge. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2008 and 2024.

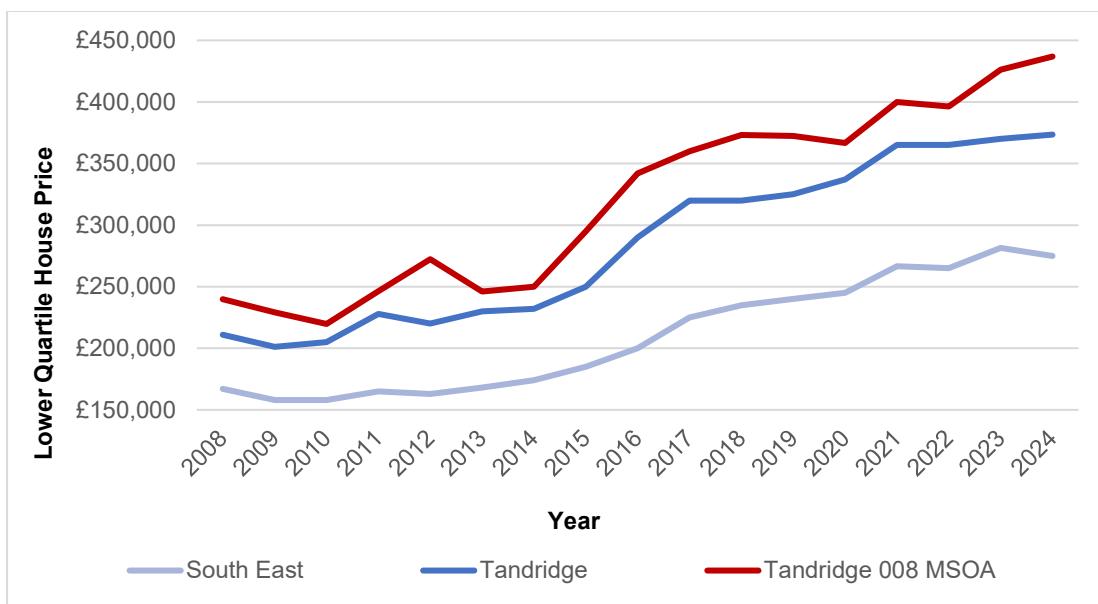
Figure 5.6: Lower Quartile House Prices, 2008 to 2024



Source: ONS.

- 5.42 The lower quartile house price across Tandridge has risen by 77% from £210,941 in 2008 to £373,500 in 2024. This compares to a 65% increase across the South East and a national increase of 48% over the same period.
- 5.43 In 2024 lower quartile house prices in Tandridge (£373,500) were 36% higher than across the South East (£275,000) and 97% higher than the national figure (£190,000).
- 5.44 It should be emphasised that in the last twelve months (2023 to 2024) lower quartile house prices in Tandridge have increased by 1%, whereas they have fallen in the South East (-2%) and England (-3%).
- 5.45 Figure 5.7 below compares the lower quartile house sale prices in the Tandridge 008 MSOA with Tandridge and the South East. Once again it demonstrates that they have increased dramatically between the start of the Core Strategy period in 2008 and 2024.

Figure 5.7: Lower Quartile House Price Comparison, 2008 to 2024



Source: ONS.

5.46 The lower quartile house price across Tandridge 008 MSOA has risen by 82% from £239,950 in 2008 to £436,875 in 2024. This figure is 17% higher than the Tandridge figure of £373,500, (which has seen an increase of 77% over the period) and 59% higher than the South East figure of £275,000 (which has seen an increase of 65% over the period).

5.47 The trend observed in relation to Tandridge at district level - that lower quartile prices are higher and have risen faster than the South East as a region and those of England – are not only present at MSOA level they are more pronounced. Strikingly, the modest (1%) increase observed in lower quartile prices between 2023 and 2024 in Tandridge when those in England and the South East fell was greater in Tandridge 008 MSOA, with prices having risen by 2% in the last year.

### Summary and Conclusions

5.48 As demonstrated through the analysis in this section, affordability across Tandridge has been, and continues to be, in crisis.

5.49 House prices and rent levels are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Tandridge out of the reach of more and more people, as recognised by the Council itself in its Homelessness and Rough Sleeping Strategy.

5.50 Analysis of market signals is critical in understanding the affordability of housing. It is TKP's opinion that there is an acute housing crisis in Tandridge, with a lower quartile house price to average income ratio of 14.75.

5.51 Market signals indicate a worsening trend in affordability in Tandridge and within the Tandridge 008 MSOA. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

# Conclusions and Recommendations

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## Section 6

### **Introduction**

- 6.1 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.
- 6.2 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.
- 6.3 Market signals indicate a worsening trend in affordability across Tandridge, and, by any measure of affordability, this is an Authority amid an affordable housing emergency, and urgent action must be taken to deliver more affordable homes.

### **Affordable Housing Offer**

- 6.4 The proposed development includes 50% on site affordable housing provision, which exceeds the requirements of Policy CSP4 of the Core Strategy 2006-2026 (adopted October 2008). Further, the proposed development is consistent with the 'Golden Rules' for development in the Green Belt set out by paragraphs 155 to 157 of the NPPF.
- 6.5 The proposed tenure split will be determined at reserved matters stage but will reflect the requirements of relevant local and national policy and guidance adopted at that time. The proposed affordable housing will be secured by way of a section 106 planning obligation.
- 6.6 The proposed affordable housing will be secured by way of a section 106 planning obligation.

### **Local Policy Position**

- 6.7 For the purposes of section 38(6) of the Planning and Compulsory Purchase Act 2004, the relevant development plan in respect of affordable housing for the application site currently comprises the Tandridge District Core Strategy 2006-2026 (adopted 2008) and the Tandridge Local Plan (Part 2) Detailed Policies 2014-2029 (adopted 2014).

6.8 This Statement highlights that within adopted policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority for the Council.

### **Affordable Housing Needs**

6.9 The most recent assessment of affordable housing need in Tandridge is the 2018 AHNA, which identifies a need for 390 affordable homes per annum between 2018/19 and 2022/23 falling to 310 affordable homes per annum between 2023/24 and 2038/39.

6.10 Though this level of affordable housing need should be understood in the context of the 2018 AHNA not reflecting the wider definition of affordable housing introduced by the 2018 NPPF. Therefore, it is likely to represent an underestimate of the full range of affordable housing need recognised by the NPPF.

6.11 Further, the 2018 AHNA is now more than seven years old and the absence of an up-to-date evidence base was the principal reason the (now withdrawn) Emerging Local Plan was found during its examination to be incapable of being made sound through the main modification process, as detailed in sections 2 and 3 of this Statement.

### **Affordable Housing Delivery**

6.12 In the sixteen-year period, for which there is data, since the start of the Core Strategy period in 2008/09, net of Right to Buy affordable housing delivery represented just 21% of overall housing delivery, equating to just 46 affordable dwellings per annum.

6.13 Since the start of the 2018 AHNA period in 2018/19, affordable housing delivery, net of the Right to Buy, has averaged just 64 dwellings per annum. This represents a substantial shortfall against the 391 affordable homes per annum the 2018 AHNA identified as needed between 2018/19 and 2022/23 and remains substantially below the 310 affordable homes per annum needed for the period after 2023/24.

6.14 Since the start of the 2018 AHNA period, net of the Right to Buy, there have been just 381 affordable housing completions. This results in a shortfall of 1,884 affordable homes when assessed against the 2,265 affordable homes the 2018 AHNA identified as needed over the same period – i.e. only 17% of the identified level of affordable housing need was met.

## **Affordability**

6.15 In addition to the persistent shortfall in affordable housing delivery against objectively assessed needs other indicators further point to an affordability crisis in Tandridge. Set out below are the key findings in respect of affordability across the District:

### Housing Register

- As of 31 March 2025, there were 1,956 households on the Housing Register.
- Successful applicants in Tandridge over the 2024/25 period experienced average waiting times of between one year and eight months and almost four years. With the longest waiting times being for family sized homes. Strikingly, no affordable homes with four or more bedroom were advertised over the period.
- Between 1 April 2024 to 31 March 2025, in Nutfield, the average number of bids per affordable home advertised ranged from a 'low' of 130 for the only 1-bedroom property advertised to 203 bids for the only 3-bedroom property advertised. It is again striking that there were just three affordable homes in total advertised in the 2024/25 monitoring year.

### Temporary Accommodation

- On 31 March 2024, there were 47 households housed in temporary accommodation by the Council, with 91% (43) of these households being households with children.

### Homelessness

- In the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 170 households in need of homelessness prevention duty, and a further 105 households in need of relief duty from the Council.

### Private Rental Market

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

### Lower Quartile House Prices

- The ratio of lower quartile house price to incomes in Tandridge in 2024 stood at **14.75**, a 26% increase since the start of the Core Strategy period in 2008 when it stood at 11.73.
- The ratio in Tandridge stands substantially above the national average of 6.77 (+118%) and significantly above the South East average of 9.38 (+57%).
- In Tandridge the lower quartile house price has risen by 77% from £210,941 in 2008 to £373,500 in 2024. This compares to a 65% increase across the South East and a national increase of 48% over the same period.
- The lower quartile house price across Tandridge 008 MSOA has risen by 82% from £239,950 in 2008 to £436,875 in 2024.

6.16 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Tandridge.

6.17 This demonstrates an acute need for affordable housing in Tandridge and one which the Council and decision takers need to do as much as possible to address as required to do so, proactively, by the NPPF (2024).

### **Summary and Conclusions**

6.18 There are serious and persistent affordability challenges across Tandridge. This is exemplified by the affordability indicators which show a poor and worsening affordability across Tandridge.

6.19 It is the opinion of Tetlow King Planning that there is an acute housing crisis in Tandridge, with a lower quartile house price to income ratio of 14.75. Mortgage lending is typically offered based on up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 328% higher than that.

6.20 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.

6.21 The affordable housing benefits of the application scheme are therefore:

- In excess of policy compliant affordable housing provision of 50% (up to 103<sup>16</sup> dwellings) of the scheme provided as affordable housing;
- A deliverable scheme which provides much needed affordable homes;
- In a sustainable location;
- With the affordable homes managed by a Registered Provider;
- Which provide better quality affordable homes; and
- Greater security of tenure than the private rented sector.

6.22 Evidently, there can be no doubt that the provision of up to 103 affordable dwellings on this site to help those in acute need in Tandridge should be afforded **very substantial weight** in the determination of this application.

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<sup>16</sup> The development consists of up to 166 dwellings and 41 later living units 50% of which will be affordable, or up to 83 affordable homes and up to 20 affordable homes from each respectively.