



NUTFIELD GREEN PARK

AFFORDABLE HOUSING
STATEMENT

OCTOBER 2023

Affordable Housing Statement

Nutfield Green Park, Nutfield, Surrey

Affordable Housing Statement

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

October 2023

OUR REF: M22/0514-04.RPT

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Contents

| | | |
|-----------|--|----|
| Section 1 | Introduction | 1 |
| Section 2 | The Development Plan and Related Policies | 3 |
| Section 3 | Affordable Housing Needs | 8 |
| Section 4 | Affordable Housing Delivery | 10 |
| Section 5 | Affordability Indicators | 19 |
| Section 6 | Conclusions and Recommendations | 31 |

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Appendices

Appendix TKP1 [Freedom of Information Response
\(29 June 2023 & 16 August 2023\)](#)

Appendix TKP2 [Independent newspaper Article
\(June 2020\)](#)

Introduction

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 and Nutfield Ward.
- 1.2 The outline proposals seek to provide up to 166 class C3 dwellings and 41 class C2 extra care units, of which there is an aspiration of up to 45% (up to 74 units) of the C3 dwellings to be delivered as affordable housing. The extra care units (41 units) would need to contribute towards affordable housing; however, this provision would form part of the overall affordable housing component due to matters of operational viability. The overall provision is therefore more like 36% affordable housing when measured against the total delivery of 207 units.
- 1.3 Following discussions with the Council's Housing Officer (Nicola Cresswell) the proposed tenure split and mix of the C3 affordable units will include 75% affordable rented and 25% shared ownership. This level of provision reflects the Tandridge Housing Strategy 2019-2023 which supersedes the development plan in terms of tenure split.
- 1.4 It should also be noted that the Council's Housing Officer explained that the Council is not seeking First Homes at this stage as there is an overwhelming need for affordable rented accommodation in Tandridge.
- 1.5 Providing a significant boost in the delivery of housing is a key priority of the Government's National Planning Policy Framework (September 2023). Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.6 This Affordable Housing 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 Bletchingley and Nutfield Ward. It concludes that there is a genuine and acute need for the

proposed affordable homes now and that planning permission should be granted promptly.

- 1.7 The Statement 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.
- 1.8 In undertaking this work, reliance has been placed upon data obtained through a Freedom of Information ("FOI") request which is included at **Appendix TKP1** to this Statement. The request was submitted on 29 June 2023 and a partial response was received on 16 August 2023.
- 1.9 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 adopted Development Plan for Tandridge District Council comprises:
- The Tandridge District Core Strategy 2006-2026 (adopted 2008); and
 - The Tandridge Local Plan (Part 2) Detailed Policies 2014-2029 (adopted 2020) (the “LPP2”)
- 2.3 Other material considerations include the National Planning Policy Framework (2021), the Planning Practice Guidance (March 2014, Ongoing Updates) and the draft Local Plan 2033 as well as several corporate documents.

The Development Plan

The Tandridge District Core Strategy 2006-2026

- 2.4 The Tandridge Core Strategy was adopted in October 2008 and sets out a series of strategic policies that are intended to steer and manage the approach for development.
- 2.5 Section 8 “*Housing Need and Balance*” sets out policies and context for affordable housing. Paragraph 8.3 explains that both the Council-commissioned Housing Need Survey (2005) and a joint East Surrey SHMA (2007) found that “*there is a very high level of unmet housing need within the District, with a significant number of households unable to access private rented or market housing” (emphasis added). The Council suggests this level of need justifies seeking to maximise the supply of affordable housing from all possible sources, particularly through the planning system.*
- 2.6 Affordable housing policy expectations are set out in **Policy CSP4 ‘Affordable Housing’** of the Core Strategy. In Tandridge the affordable housing to be sought (subject to market and site conditions) is:

- *On sites within the built up areas of 15 units or more or sites of or greater than 0.5 hectare; and*
- *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.** (emphasis added).*

- 2.7 An overall policy target of 50 affordable completions per annum is set for the five year period from 2007 to 2012.
- 2.8 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.
- 2.9 Whilst the policy wording indicates that Policy CSP4 is prepared on an interim basis in advance of a separate Affordable Housing Development Plan Document, no such document has been prepared.

The Tandridge Local Plan (Part 2) Detailed Policies 2014-2029

- 2.10 The Local Plan Part 2 was adopted in 2020. There are limited policies that deal with the ‘*general*’ provision of affordable housing that isn’t on previously developed land, a rural exception site or hasn’t been allocated as affordable housing. None of the policies are relevant to the consideration of the Nutfield Green Park scheme.

Other Material Considerations

Draft ‘Our Local Plan 2033’

- 2.11 At the time of writing, the Inspector examining the draft Tandridge Local Plan ‘Our Local Plan: 2033’ has issued a letter to the Council dated 10th August 2023, following a procedural meeting held on 27th July 2023. Following a three year protracted examination process, the Inspector has acknowledged a number of procedural challenges in progressing the Plan such that it is not possible to make the Plan sound by proposing main modifications to it and will therefore recommend that the Plan is unsound and that it is not adopted. Alternatively, the Inspector has suggested that the Council may wish to withdraw the Local Plan before his recommendation is confirmed within the Inspector’s Examination Report. Until the position on the draft Plan is formalised this Report has included draft Local Plan policies, but in the circumstances, limited weight should now be attributed to them. Once the Local Plan has been found unsound / withdrawn, the draft policies referenced will no longer be relevant and carry no weight in the determination process.

- 2.12 Notwithstanding the position with regards the draft Local Plan, the draft Local Plan and its underlying evidence base documents are considered to still provide some use for the analysis in the locality in terms of demonstrating need for affordable housing and as such referenced documents are the most up-to-date evidence base there is from the Council on such matters. Therefore, whilst the draft policies themselves cannot be afforded any weight (or very limited weight) for the planning determination of the Proposed Development; we have retained analysis of all relevant corporate documents issued by the Council.
- 2.13 Paragraph 2.2 notes the intention of the plan to help develop the district in the right way, ensuring the district have *“the right facilities and infrastructure in place to support communities, grow the local economy and provide homes which are affordable including for those looking for their forever home and those just starting out on the housing ladder.”*

Corporate Documents

- 2.14 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:
- a. *Tandridge Housing Strategy 2019-2023; and*
 - b. *Tandridge Homelessness Prevention and Rough Sleeping Strategy 2019-2023.*
- Tandridge Housing Strategy 2019-2023

- 2.15 Page 6 sets out the Council’s Strategic Vision and states that:

“To improve the quality of residents’ lives and wellbeing by delivering high quality homes of all types and tenure, including affordable housing and by maintaining conditions of homes in the district to the decent homes standard, while focussing our assistance on those in most urgent need.” (emphasis added).

- 2.16 Paragraph 1.28 (page 12) of the Tandridge Housing Strategy states that:

“The Council needs a steady stream of sites coming forward through the planning process that will supply in excess of 50 homes a year with a split between affordable rent and affordable homeownership of 75% and 25% respectively. These will be sites delivering greater than 15 homes in our urban areas and 10 units in semi-rural.” (emphasis added).

- 2.17 It should be noted that Planning Practice Guidance¹ requires that 25% of the affordable housing units should be delivered as 'First Homes'. It goes on to set out that the remaining 75% of the affordable housing units should be delivered in line with the proportions set out in local planning policy².
- 2.18 Pages 14-15 of the Housing Strategy set out the Council's preferred dwelling sizes for the period 2013-2033. Table 14 of the Housing Strategy is replicated below for ease of reference:

Figure 2.1: Size of Accommodation Required 2013-2033

| | No. of dwellings | % of need for dwelling type | % of total need |
|----------------------|------------------|-----------------------------|-----------------|
| Detached | | | |
| 3 or less bedrooms | 1,323 | 39% | 14% |
| 4 bedrooms | 1,277 | 38% | 14% |
| 5 or more bedrooms | 767 | 23% | 8% |
| Semi-detached | | | |
| 2 or less bedrooms | 569 | 22% | 6% |
| 3 bedrooms | 1,548 | 59% | 17% |
| 4 or more bedrooms | 502 | 19% | 5% |
| Terraced | | | |
| 2 or less bedrooms | 520 | 40% | 6% |
| 3 or more bedrooms | 784 | 60% | 9% |
| Flats | | | |
| 1 bedroom | 706 | 38% | 8% |
| 2 bedroom | 1,156 | 62% | 13% |

Source: Table 4 (Page 15) of the Housing Strategy 2019-2023

Tandridge Homelessness Prevention and Rough Sleeping Strategy 2019-2023

- 2.19 The Tandridge Homelessness Prevention and Rough Sleeping Strategy was published in 2019. Paragraph 1.4 of the introduction (page 8) states that: “

“The five-year duration of the previous Homelessness Prevention Strategy has been at a time of fast-paced and significant change in the public sector. As a consequence, the Council has needed to profoundly reconsider how services are delivered to its communities with far fewer resources. This challenge, combined with the extreme shortage of affordable housing, to rent and to buy; the increasing unaffordability of the private rented sector; set against a backdrop of welfare reform which for many reduced the amount of financial

¹ Paragraph: 014 Reference ID: 70-014-20210524

² Paragraph: 015 Reference ID: 70-015-20210524

support available to cover housing costs, has all served to intensify the challenge of preventing homelessness." (emphasis added).

2.20 Page 19 relates to the housing register and states that:

"Levels of homelessness applications and numbers waiting on the Council's housing register are directly influenced by the supply of affordable housing. In years where limited or no new affordable housing units were delivered, numbers of people coming forward as homeless increased, as did numbers of households registered on the Council's housing waiting list."

2.21 Page 25 titled 'delivering more affordable housing' states that *"the solution to homelessness is the delivery of more affordable housing, of the right type and size and in the right areas, supported by infrastructure."* (paragraph 3.1).

2.22 Paragraph 3.22 (page 29) goes on to explain that *"The main solution for homelessness is the provision of more affordable housing in the district."*

Conclusions on the Development Plan and Related Policies

2.23 The Development Plan for Tandridge District Council currently comprises the Core Strategy 2006-2026 (2008); and the Tandridge Local Plan Part 2 2014-2029 (2020).

2.24 The evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Tandridge District.

2.25 The application proposals provide an affordable housing contribution which exceeds requirements of Core Strategy, Policy CSP4.

2.26 The up to 74 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 3 of this statement.

Affordable Housing Needs

Section 3

The Development Plan

- 3.1 The adopted Development Plan does not define a numerical target for the provision of affordable homes. Instead, the adopted Core Strategy seeks 34% affordable housing provision is made from qualifying developments; and the emerging Local Plan seeks 40% affordable housing provision³.
- 3.2 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.

Needs Assessments

- 3.3 Tandridge District Council have published three assessments of affordable housing need over the course of the past 14 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

- 3.4 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.
- 3.5 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

- 3.6 The Affordable Housing Needs Assessment Technical Paper (“2015 AHNA”) was published September 2015. The 2015 AHNA covers the period 2015/16 to 2019/20. It is important to highlight this assessment of need has been tested at Examination in

³ Please see paragraph 2.11 of this statement.

Public as part of the Emerging Local Plan 2033 but is still awaiting final views of the Inspector and should therefore be treated with caution.

- 3.7 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

- 3.8 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.
- 3.9 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.
- 3.10 The 2018 AHNA concluded that there is a need for **391 affordable dwellings per annum between 2018/19 and 2022/23**. 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.

Conclusions on Affordable Housing Needs

- 3.11 Figure 3.1 below summarises the identified needs set out in each of the three assessments of affordable housing need discussed above.

Figure 3.1: Summary of Housing Needs Assessments in Tandridge District

| Document | Base date | End date | Annual affordable housing need |
|-----------|-----------|----------|--------------------------------|
| 2008 SHMA | 2008/09 | 2012/13 | 720 dwellings |
| 2015 AHNA | 2015/16 | 2019/20 | 456 dwellings |
| 2018 AHNA | 2018/19 | 2022/23 | 391 dwellings |

Affordable Housing Delivery

Section 4

Past Affordable Housing Delivery

- 4.1 Figure 4.1 illustrates the delivery of affordable housing ("AH") in Tandridge District since the start of the Core Strategy period in 2006/07.

Figure 4.1: Gross Additions to Affordable Housing Stock, 2006/07 to 2021/22

| Monitoring Period | Total Housing Completions (Net) | Additions to AH Stock (Gross) | Gross AH as a %age of total completions |
|-------------------|---------------------------------|-------------------------------|---|
| 2006/07 | 417 | 318 | 76% |
| 2007/08 | 269 | 43 | 16% |
| 2008/09 | 281 | 37 | 13% |
| 2009/10 | 155 | 27 | 17% |
| 2010/11 | 147 | 54 | 37% |
| 2011/12 | 123 | 60 | 49% |
| 2012/13 | 221 | 43 | 19% |
| 2013/14 | 257 | 57 | 22% |
| 2014/15 | 142 | 60 | 42% |
| 2015/16 | 318 | 12 | 4% |
| 2016/17 | 214 | 56 | 26% |
| 2017/18 | 307 | 150 | 49% |
| 2018/19 | 244 | 76 | 31% |
| 2019/20 | 262 | 122 | 47% |
| 2020/21 | 117 | 44 | 38% |
| 2021/22 | 238 | 60 | 25% |
| Total | 3,710 | 1,219 | 33% |
| Avg. Pa. | 232 | 76 | |

Source: DLUHC Live Tables 122, 1008C, 691 and 693; Statistical Data Returns data sets for the period 2011/12 to 2021/22.

- 4.2 Between 2006/07 and 2021/22, a total of 3,710 dwellings were delivered in Tandridge District, equivalent to 232 per annum. Of these, 1,219 dwellings were affordable tenures, equivalent to 76 per annum. This equates to 33% gross affordable housing delivery.
- 4.3 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy (“RtB”) sales from existing Council and Registered Provider⁴ (“RP”) affordable housing stock.
- 4.4 Figure 4.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy period in 2006/07, net of Right to Buy sales. A net loss of 157⁵ affordable dwellings over this period equates to 12% of the gross affordable housing completions of 1,219 affordable dwellings over the 16-year period.

⁴ RtB data on RP sales of affordable housing to RP tenants is contained in the annual Statistical Data Returns (‘SDR’) data sets for the period 2011/12 to 2021/22 published by the Regulator of Social Housing. These figures have been combined on an annual basis to produce total Right to Buy sales.

⁵ $(160 + 5) - 8 = 157$ dwellings

Figure 4.2: Net of Right to Buy Additions to Affordable Housing Stock, 2006/07 to 2021/22

| Monitoring Period | Total housing completions (Net) | Additions to AH Stock (Gross) | LPA Acquisitions | LPA RtB sales | RP RtB sales | Additions to AH Stock (Net of RtB) | Additions to AH Stock (Net of RtB) as a %age of total completions |
|-------------------|---------------------------------|-------------------------------|------------------|---------------|--------------|---|---|
| | <i>A</i> | <i>B</i> | <i>C</i> | <i>D</i> | <i>E</i> | <i>F</i> (<i>B</i> + <i>C</i>) - (<i>D</i> + <i>E</i>) | <i>G</i> (<i>F</i> / <i>A</i>) X 100 |
| 2006/07 | 417 | 318 | n/a | 19 | n/a | 299 | 72% |
| 2007/08 | 269 | 43 | n/a | 12 | n/a | 31 | 12% |
| 2008/09 | 281 | 37 | n/a | 4 | n/a | 33 | 12% |
| 2009/10 | 155 | 27 | n/a | 1 | n/a | 26 | 17% |
| 2010/11 | 147 | 54 | n/a | 2 | n/a | 52 | 35% |
| 2011/12 | 123 | 60 | n/a | 4 | 0 | 56 | 46% |
| 2012/13 | 221 | 43 | n/a | 11 | 0 | 32 | 14% |
| 2013/14 | 257 | 57 | n/a | 15 | 0 | 42 | 16% |
| 2014/15 | 142 | 60 | n/a | 7 | 3 | 50 | 35% |
| 2015/16 | 318 | 12 | n/a | 21 | 1 | -10 | -3% |
| 2016/17 | 214 | 56 | 0 | 10 | 0 | 46 | 21% |
| 2017/18 | 307 | 150 | 0 | 8 | 0 | 142 | 46% |
| 2018/19 | 244 | 76 | 0 | 11 | 0 | 65 | 27% |
| 2019/20 | 262 | 122 | 0 | 6 | 1 | 115 | 44% |
| 2020/21 | 117 | 44 | 1 | 11 | 0 | 34 | 29% |
| 2021/22 | 238 | 60 | 7 | 8 | 0 | 59 | 28% |
| Total | 3,710 | 1,219 | 8 | 160 | 5 | 1,062 | 29% |
| Avg. Pa. | 232 | 76 | 1 | 10 | 0 | 66 | 29% |

Source: DLUHC Live Tables 122, 1008C, 691 and 693; Statistical Data Returns data sets for the period 2011/12 to 2021/22.

- 4.5 Figure 4.2 demonstrates that on average between 2006/07 and 2021/22, the council has added just 66 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 29% of the total average number of net housing completions. This figure is likely to fall even further if demolitions to existing stock were to be accounted for.
- 4.6 The above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Tandridge District faster than the replacements from acquisitions.
- 4.7 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal at land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019⁶. 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).*
- 4.8 This was later endorsed by the Secretary of State, who stated that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.
- 4.9 The seriousness of the impact was considered in a Newspaper article in the Independent newspaper in June 2020. The article is attached as **Appendix TKP2**. The reporter considered how Council housing sell-off continues as government fails to replace most homes sold under Right to Buy.
- 4.10 It advised that, *“Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show.”* It went on to say that *“Housing charities warned that enough “desperately needed” genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090*

⁶ SoS decision reference: 3192918

built to replace them, statistics from the Ministry of Housing, Communities and Local Government show”.

- 4.11 The articles goes on to quote Jon Sparkes, chief executive at homelessness charity Crisis, who said: *“These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.”*
- 4.12 It is important therefore that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account, to reflect the actual level of affordable houses available.
- 4.13 The recent comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery Compared to Affordable Housing Needs

2008 SHMA

- 4.14 Figure 4.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 720 net affordable dwellings per annum between 2008/09 and 2012/13, as set out in the 2008 SHMA.

Figure 4.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2008 SHMA, 2008/09 to 2012/13

| Monitoring Period | Additions to AH Stock (Net of RtB) | 2008 SHMA AH Needs Per Annum (Net) | Annual Shortfall | Cumulative Shortfall | Additions as a %age of Needs |
|-------------------|------------------------------------|------------------------------------|------------------|----------------------|------------------------------|
| 2008/09 | 33 | 720 | -687 | -687 | 5% |
| 2009/10 | 26 | 720 | -694 | -1,381 | 4% |
| 2010/11 | 52 | 720 | -668 | -2,049 | 7% |
| 2011/12 | 56 | 720 | -664 | -2,713 | 8% |
| 2012/13 | 32 | 720 | -688 | -3,401 | 7% |
| Total | 199 | 3,600 | -3,401 | | 6% |
| Avg. Pa. | 40 | 720 | -680 | | |

Source: DLUHC Live Tables 122, 1008C, 691 and 693; Statistical Data Returns data sets for the period 2011/12 to 2021/22; and 2008 SHMA.

- 4.15 Since the start of the 2008 SHMA period in 2008/09 affordable housing completions (net of Right to Buy) have averaged just 40 net affordable dwellings per annum, against a need of 720 net affordable dwellings per annum. A shortfall of -3,401 affordable dwellings has arisen over the five-year period, equivalent to an average annual shortfall of -680 affordable dwellings.

2015 AHNA

- 4.16 Figure 4.4 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 4.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2015 AHNA, 2015/16 to 2019/20

| Monitoring Period | Additions to AH Stock (Net of RtB) | 2015 AHNA AH Needs Per Annum (Net) | Annual Shortfall | Cumulative Shortfall | Additions as a %age of Needs |
|-------------------|------------------------------------|------------------------------------|------------------|----------------------|------------------------------|
| 2015/16 | -10 | 456 | -466 | -466 | -2% |
| 2016/17 | 46 | 456 | -410 | -876 | 10% |
| 2017/18 | 142 | 456 | -314 | -1,190 | 31% |
| 2018/19 | 65 | 456 | -391 | -1,581 | 14% |
| 2019/20 | 115 | 456 | -341 | -1,922 | 25% |
| Total | 358 | 2,280 | -1,922 | | 16% |
| Avg. Pa. | 72 | 456 | -384 | | |

Source: DLUHC Live Tables 122, 1008C, 691 and 693; Statistical Data Returns data sets for the period 2011/12 to 2021/22; and 2015 AHNA.

- 4.17 Since the start of the 2015 AHNA period in 2015/16 affordable housing completions (net of Right to Buy) have averaged just 72 net affordable dwellings per annum, against a need of 456 net affordable dwellings per annum. A shortfall of -1,922 affordable dwellings has arisen over the five-year period, equivalent to an average annual shortfall of -384 affordable dwellings.

2018 AHNA

- 4.18 Figure 4.5 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 391 net affordable dwellings per annum between 2018/19 and 2021/22, as set out in the 2018 AHNA.

Figure 4.5: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2018 AHNA, 2018/19 to 2021/22

| Monitoring Period | Additions to AH Stock (Net of RtB) | 2018 AHNA AH Needs Per Annum (Net) | Annual Shortfall | Cumulative Shortfall | Additions as a %age of Needs |
|-------------------|------------------------------------|------------------------------------|------------------|----------------------|------------------------------|
| 2018/19 | 65 | 391 | -326 | -326 | 17% |
| 2019/20 | 115 | 391 | -276 | -602 | 29% |
| 2020/21 | 34 | 391 | -357 | -959 | 9% |
| 2021/22 | 59 | 391 | -332 | -1,291 | 15% |
| Total | 273 | 1,564 | -1,291 | | 17% |
| Avg. Pa. | 68 | 391 | -323 | | |

Source: DLUHC Live Tables 122, 1008C, 691 and 693; Statistical Data Returns data sets for the period 2011/12 to 2021/22; and 2018 AHNA.

- 4.19 Since the start of the 2018 AHNA period in 2018/19 affordable housing completions (net of Right to Buy) have averaged just 70 net affordable dwellings per annum, against a need of 391 net affordable dwellings per annum. A shortfall of -1,291 affordable dwellings has arisen over the four-year period, equivalent to an average annual shortfall of -323 affordable dwellings.
- 4.20 As demonstrated by Figure 4.5, delivery of only 281 affordable homes net of Right to Buy over the period means that just 17% of identified affordable housing needs were met. Put another way 83% households in need of an affordable home were let down by the councils inability to deliver.
- 4.21 A recent appeal decision at Limpsfield Road, Warlingham (within Tandridge District)⁷ refers to the Council's most recent assessment of affordable housing need (2018 AHNA). The appeal decision outlines that just 68 affordable dwellings per annum have delivered since 2006. This report assesses affordable housing delivery since the start of the Core Strategy period in 2006 and concludes that the Council have delivered just 67 net of RtB affordable dwellings per annum since this date.
- 4.22 The appeal decision goes on to conclude that the Council have a shortfall of -53 affordable dwellings per annum against the 2018 AHNA which requires 391 affordable dwellings per annum between 2018/19 and 2021/22. This affordable housing

⁷ Appeal reference: 3309334

statement concludes that the shortfall is significantly higher when taking in account RtB losses, with a shortfall of -321 affordable dwellings per annum.

- 4.23 In the Limpsfield Road appeal decision the Inspector gives significant weight to provision of affordable housing. Given that TKPs own analysis shows a much higher shortfall of -321 per annum, we consider it appropriate for a above policy offer of 45% affordable housing to attract very substantial weight in the planning balance.

Conclusions on Affordable Housing Delivery

- 4.24 The above evidence demonstrates that across Tandridge District, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 4.25 In the 16-year period since the start of the Core Strategy period in 2006/07 net of Right to Buy affordable housing delivery represented just 29% of overall housing delivery, equating to just 67 affordable dwellings per annum.
- 4.26 The 2008 SHMA sets a need for 720 affordable dwellings per annum between 2008/09 and 2012/13. A shortfall of -3,401 affordable dwellings has arisen in the five year period, equivalent to -680 per annum.
- 4.27 The 2015 AHNA sets a need for 456 affordable dwellings per annum between 2015/16 and 2019/20. A shortfall of -1,922 affordable dwellings has arisen in the five year period, equivalent to -384 per annum.
- 4.28 The 2018 AHNA is the most recent assessment of affordable housing need, requiring 391 affordable dwellings per annum between 2018/19 and 2021/22. A shortfall of -1,283 affordable dwellings has arisen in first four years of the 2018 AHNA period, equivalent to -321 per annum.
- 4.29 It is clear that a 'step change' in affordable housing delivery is needed now in Tandridge District to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 4.30 In light of the identified level of need there can be no doubt that the delivery of up to 74 affordable dwellings on the proposed site will make a significant contribution to the affordable housing needs of Tandridge District Council.

Affordability Indicators

Section 5

Market Signals

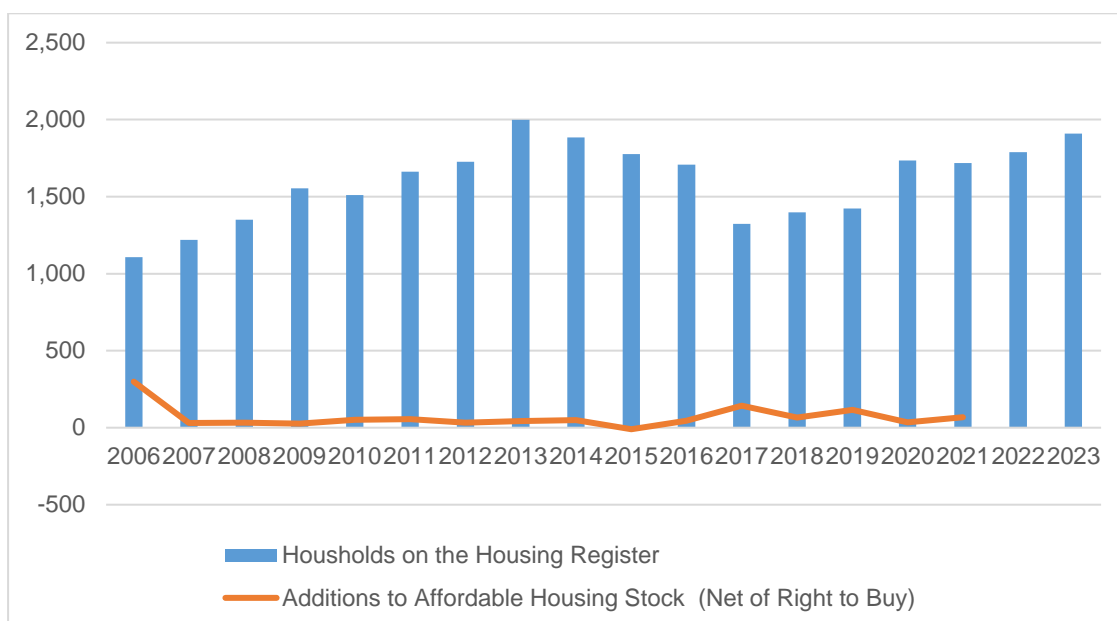
- 5.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.

Housing Register

- 5.2 The Council's Freedom of Information response (**Appendix TKP1**) confirms that as at 31st March 2023 there were 1,910 households on the Housing Register. This represents a 7% increase in a single year from 1,788 households at 31 March 2022 (which itself was a 4% increase from 1,718 households at 31 March 2021).
- 5.3 Of the 1,910 households on the Housing Register at 31st March 2022, 156 households specified a preference for an affordable home in Nutfield⁸; this represents 8% of the housing register.
- 5.4 Figure 5.1 provides a comparative analysis of the number of households on the Housing Register and affordable housing delivery (net of Right to Buy) across Tandridge District since the start of the Core Strategy period in 2006.

⁸ FOI data was provided for the settlement of Nutfield, rather than at ward level.

Figure 5.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2006 to 2022



Source: Freedom of Information response (16 August 2023); DLUHC Live Tables 122, 1008C, 600, 691 and 693; Statistical Data Returns data sets for the period 2011/12 to 2021/22; and 2018 AHNA.

Note: completions figures are not yet available for the 2022/2023 or 2023/24 monitoring period

5.5 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 District since 2006.

5.6 Footnote 4 of DLUHC⁹ Live Table 600 highlights that:

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

5.7 Evidently the result of the Localism Act is that many local authorities, including Tandridge District Council, 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.

⁹ Department for Levelling Up, Housing and Communities

- 5.8 Following the 2012 changes brought about by the Localism Act, Tandridge District Council published a revised Housing Allocations Scheme which received further revisions in **July 2021, August 2022, and April 2023.**
- 5.9 The most up to date Housing Allocation Scheme was published in April 2023. Section 4 (page 7) sets out the households which are not eligible for the Housing Register:
- *Those considered to be guilty of unacceptable behaviour;*
 - *Those who are property owners who have an asset that could be used to obtain accommodation suitable to their needs.*
 - *Those with an annual household gross income in excess of £60,000 or savings/assets in excess of £75,000.*
 - *Those who have within 5 years of the date of their application, disposed of an asset which they could reasonably have been expected to use to resolve their own housing difficulties, or*
 - *Those who have previously benefitted from the Right to Buy of a social housing property whether in Tandridge or another local authority area. Exceptions may be made on a case by case basis, such as relationship breakdown, where one partner is unable to live in the property and has no legal rights to force sale or release any equity.*
- 5.10 Section 6 of the April 2023 Housing Allocation Scheme goes on to outline the Council's 'Reduced Preference' policy, stating that *"The supply of rented social housing available to the Council is limited and the Council cannot provide rented accommodation to everyone who requests it. Reduced priority for housing will therefore be given to eligible applicants where:*
- *They do not have a local connection with the District of Tandridge;*
 - *They have financial resources available to meet their housing costs or where they have had such resources but have unreasonably disposed of them;*
 - *Their behaviour or that of a member of their household affects their suitability to be a tenant; and*
 - *They are the tenant of a housing association (registered provider) property in Tandridge for which the Council does not have nomination rights or are living in temporary accommodation provided by another local housing authority.*

- 5.11 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 District.
- 5.12 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.
- 5.13 It may also have other negative impacts when you consider that those who are excluded from the register may be forced to move away from Tandridge District to cheaper more affordable areas but due to their connections to the area, they still have to commute back into the area to visit friends, family and travel to their place of work.
- 5.14 One clear impact of this is that such an eventuality would generate extra traffic which brings in to question the sustainability of such an approach.
- 5.15 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester¹⁰ in August 2017. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

“The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal” (emphasis added).

- 5.16 Furthermore, in the recent appeal decision at Oxford Brookes University Campus at Wheatley¹¹, Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family

¹⁰ Appeal reference: 3165228

¹¹ SoS decision reference: 3230827

in urgent need who have been let down by a persistent failure to deliver enough affordable houses" (emphasis added).

5.17 The Inspector went on to state at paragraph 13.102 that:

"Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list" before concluding that "Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight".

5.18 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

"The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight".

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

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

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

- 5.22 The Franklands Drive Secretary of State appeal decision in 2006¹² underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 of the Inspector's report the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.
- 5.23 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. Furthermore, as previously raised the wider definition of affordable housing is not reflected in the 2008 SHMA.

Waiting Times

- 5.24 In addition, the wait to be housed in an affordable home within the area ranges from 662 days for a 1-bed affordable home through to 1,536 days for a 3-bed+ affordable home.
- 5.25 The waiting times for all affordable property sizes is set out at Figure 5.2 below and presents further stark evidence of a deteriorating affordable housing crisis afflicting Tandridge District.

Figure 5.2: Housing Register Average Waiting Times, March 2022 to March 2023

| Size of Affordable Property | Average Waiting Time to be Housed at 31 March 2023 |
|-----------------------------|--|
| 1-bedroom home | Band B: 473 days |
| | Band C: 851 days |
| | Average: 662 days |
| 2-bedroom home | Band B: 856 days |
| 3-bedroom home | Band B: 1,536 days |
| 4+ bedroom home | No 4-bedroom properties were let during this period. |

Source: Freedom of Information response (16 August 2023)

¹² SoS decision reference: 1198326

Temporary Accommodation

- 5.26 The FOI response details that 42 households were housed in temporary accommodation within the Tandridge District at 31 March 2023. Tandridge District Council has a responsibility to house these households.
- 5.27 Furthermore, an additional 10 households were housed in temporary accommodation outside the Tandridge District region at 31 March 2023.
- 5.28 Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network.
- 5.29 The “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” report published in August 2019 by the Children’s Commissioner found that temporary accommodation presents serious risks to children’s health, wellbeing and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour or those with substance abuse issues.
- 5.30 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a “*significant impact on many aspects of their lives*”.

Homelessness

- 5.31 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 225 households in need of homelessness prevention duty¹³, and a further 100 households in need of relief duty¹⁴ from the Council.
- 5.32 The Tandridge Homelessness and Rough Sleeping Strategy 2019-2023 (paragraph 1.4) states that:

“...the Council has needed to profoundly reconsider how services are delivered to its communities with far fewer resources. This challenge, combined with the extreme shortage of affordable housing, to rent and to buy; the increasing unaffordability of the private rented sector; set against a backdrop of welfare

¹³ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

¹⁴ 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.

reform which for many reduced the amount of financial support available to cover housing costs, has all served to intensify the challenge of preventing homelessness." (emphasis added).

5.33 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. The proportion of households accepted as homeless by local authorities due to the end of an assured shorthold tenancy increased from 11% during 2009-10 to 32% during 2016-17. The proportion in London increased during the same period from 10% to 39%. Across England, the ending of private sector tenancies accounts for 74% of the growth in households who qualify for temporary accommodation since 2009-10. Before this increase, homelessness was driven by other causes. These included more personal factors, such as relationship breakdown and parents no longer being willing or able to house children in their own homes. The end of an assured shorthold tenancy is the defining characteristic of the increase in homelessness that has occurred since 2010." (Emphasis in original).

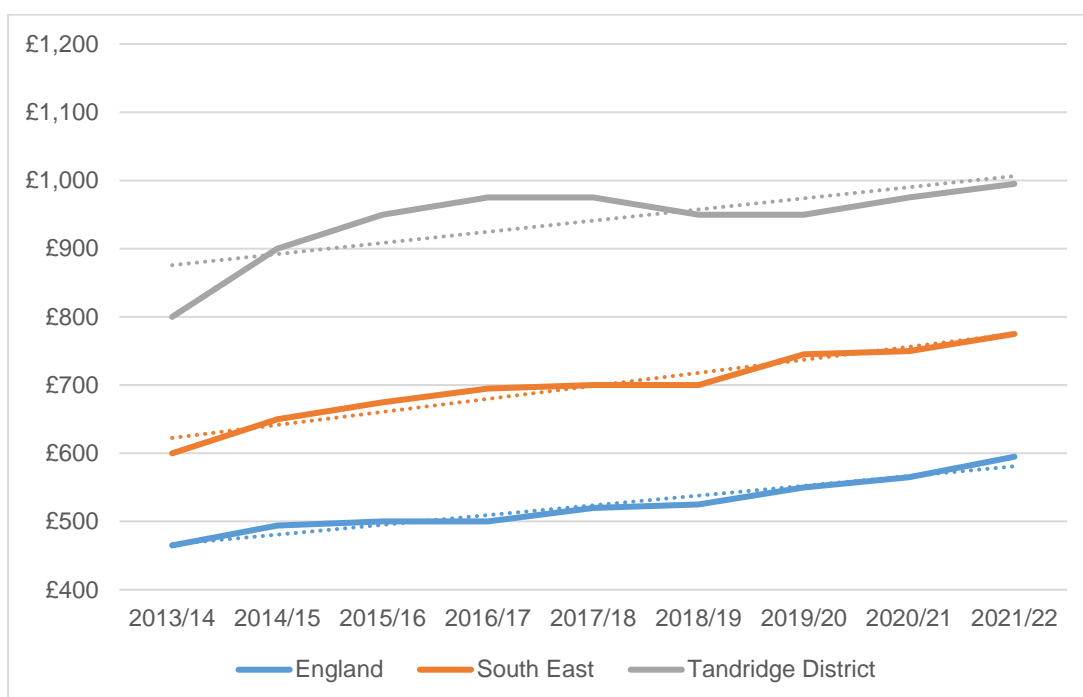
5.34 The NAO report also noted that *"The affordability of tenancies is likely to have contributed to the increase in homelessness"* and that *"Changes to Local Housing Allowance are likely to have contributed to the affordability of tenancies for those on benefits and are an element of the increase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

Private Rental Market

5.35 Valuation Office Agency ("VOA") and Office for National Statistics ("ONS") data (first produced in 2013/14) provide lower quartile rental data. Lower quartile private sector rents are representative of the 'entry level' of the private rented sector and include dwellings sought by households on lower incomes, and those relying upon Local Housing Allowance ("LHA") to cover their housing costs.

5.36 The average lower quartile monthly rent in Tandridge District in 2021/22 was £995 pcm. This represents a 24% increase from 2013/14 where average lower quartile monthly rents stood at £800 pcm.

Figure 5.3: Lower Quartile Private Sector Rents, 2013/14 to 2021/22



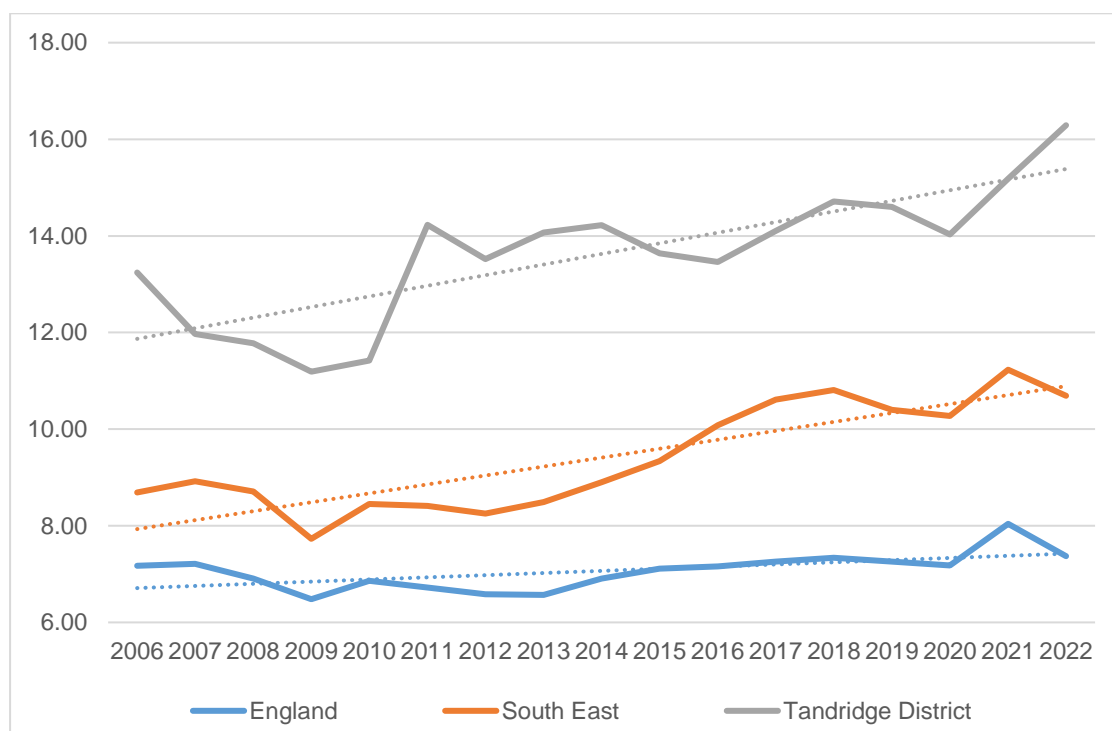
Source: VOA and ONS Private Rental Market Statistics

- 5.37 A lower quartile rent of £995 pcm in 2021/22 is 25% higher than the South East figure of £775 pcm and 67% higher than the national figure of £595 pcm.

Lower Quartile House Prices

- 5.38 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 District now stands at 16.29, a 23% increase since the start of the Core Strategy period in 2006 where it stood at 13.24.
- 5.39 As demonstrated by Figure 5.4, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 5.40 Once again it remains the case that the ratio in Tandridge District (16.29) stands significantly above the national average of 7.37 (+121%) and above the South East average of 10.69 (+52%).
- 5.41 For context, a ratio of 16.29 in Tandridge District is the fourth highest in the South East region, from a total of 64 local authorities.

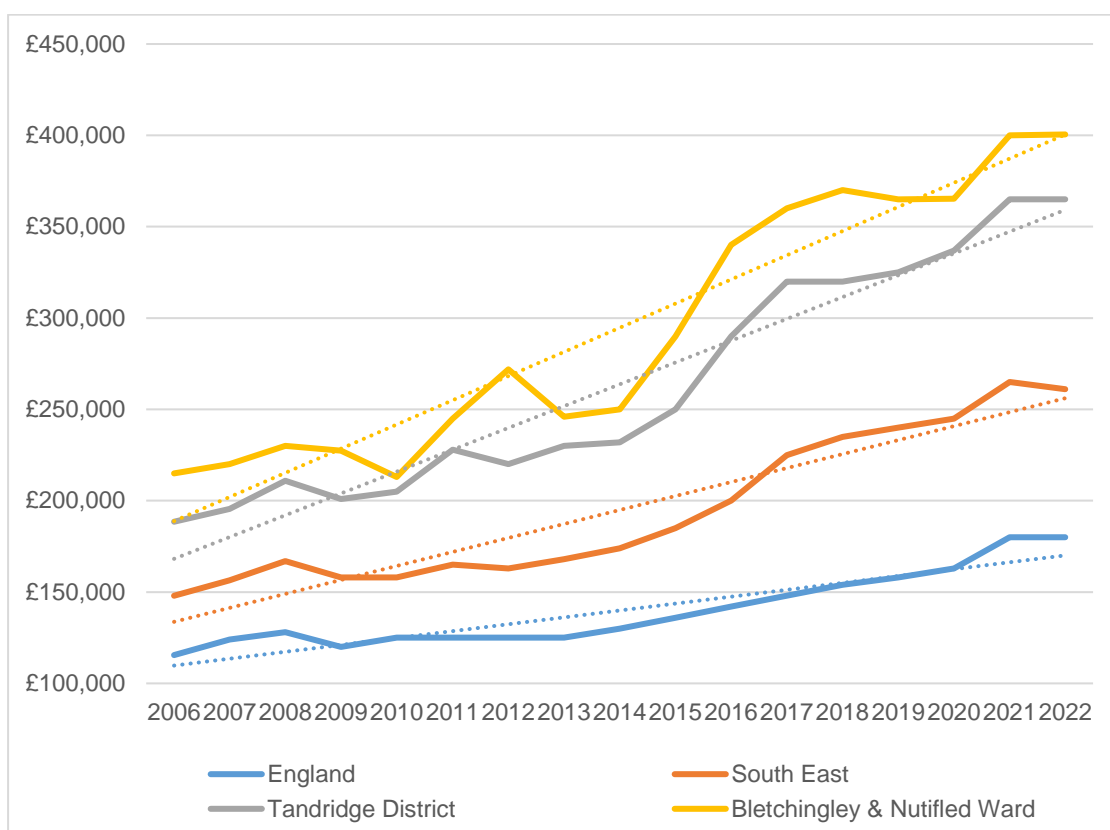
Figure 5.4: Lower Quartile Workplace-Based Affordability Ratio comparison, 2006 to 2022



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

- 5.42 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 262% higher than that and rising.
- 5.43 Figure 5.5 illustrates the lower quartile house sale prices for England, the South East, Tandridge District and Bletchingley & Nutfield Ward. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2006 and 2022.
- 5.44 The lower quartile house price across Bletchingley & Nutfield Ward has risen by 86% from £215,000 in 2006 to £400,500 in 2022. This compares to a 94% increase across Tandridge District, a 76% increase across the South East and a national increase of 56% over the same period.
- 5.45 In 2022 lower quartile house prices in the Bletchingley & Nutfield Ward (£400,500) were 10% higher than across Tandridge District (£365,000), 53% higher than across the South East (£261,000) and 123% higher than the national figure (£180,000).

Figure 5.5: Lower Quartile House Prices, 2008 to 2022



Source: ONS HPSSA Datasets

- 5.46 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire¹⁵ in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

“78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere. In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products.”

¹⁵ Appeal reference: 3278256

79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. I therefore place **substantial positive weight** on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard" (emphasis added).

Conclusions on Affordability Indicators

- 5.47 As demonstrated through the analysis in this section, affordability across Tandridge District has been and continues to be, in crisis.
- 5.48 House prices and rent levels in both the average, median and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Tandridge District out of the reach of more and more people.
- 5.49 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Tandridge District, with a lower quartile house price to average income ratio of 16.29.
- 5.50 Market signals indicate a worsening trend in affordability in Tandridge District and within Bletchingley & Nutfield 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.

Conclusions and Recommendations

Section 6

Affordable Housing Offer

- 6.1 As detailed at paragraph 1.2 of this statement, the outline proposals seek to provide 166 class C3 dwellings and 41 class C2 extra care units, of which there is an aspiration of up to 45% (up to 74 units) of the C3 dwellings to be delivered as affordable housing. The extra care units would need to contribute towards affordable housing; however, this provision would form part of the overall affordable housing component due to matters of operational viability. The overall provision is therefore more like 36% affordable housing when measured against the total delivery of 205 units.
- 6.2 In any event, this level of provision exceeds the requirements of adopted Policy CS4 of the Core Strategy which requires 34% affordable housing.
- 6.3 The proposed tenure split and mix of the C3 affordable units will include 75% affordable rented and 25% shared ownership. This level of provision reflects the Tandridge Housing Strategy 2019-2023 and discussions with the Council's Housing Officer.

Policy Position

- 6.4 The relevant adopted Development Plan for Tandridge District Council currently comprises the Core Strategy 2006-2026, which was adopted in 2008 and the Local Plan (Part 2) Detailed Policies 2014-2029 which was adopted in 2020.
- 6.5 Paragraph 1.28 (page 12) of the Tandridge Housing Strategy states that:
- "The Council needs a steady stream of sites coming forward through the planning process that will supply in excess of 50 homes a year with a split between affordable rent and affordable homeownership of 75% and 25% respectively. These will be sites delivering greater than 15 homes in our urban areas and 10 units in semi-rural."* (emphasis added).
- 6.6 It should be noted that Planning Practice Guidance¹⁶ requires that 25% of the affordable housing units should be delivered as 'First Homes'. It goes on to set out that

¹⁶ Paragraph: 014 Reference ID: 70-014-20210524

the remaining 75% of the affordable housing units should be delivered in line with the proportions set out in local planning policy¹⁷.

- 6.7 This Statement 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 priority for Tandridge District Council.

Affordable Housing Needs

- 6.8 Tandridge District Council have published three assessments of affordable housing need over the course of the past 16 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.

Figure 6.1: Summary of Housing Needs Assessments in Tandridge District

| Document | Base date | End date | Annual affordable housing need |
|-----------|-----------|----------|--------------------------------|
| 2008 SHMA | 2008/09 | 2012/13 | 720 dwellings |
| 2015 AHNA | 2015/16 | 2019/20 | 456 dwellings |
| 2018 AHNA | 2018/19 | 2022/23 | 391 dwellings |

Affordable Housing Delivery

- 6.9 In the 16-year period since the start of the Core Strategy period in 2006/07 net of Right to Buy affordable housing delivery represented just 29% of overall housing delivery, equating to just 66 affordable dwellings per annum.
- 6.10 The 2008 SHMA sets a need for 720 affordable dwellings per annum between 2008/09 and 2012/13. A shortfall of -3,401 affordable dwellings has arisen in the five year period, equivalent to -680 per annum.
- 6.11 The 2015 AHNA sets a need for 456 affordable dwellings per annum between 2015/16 and 2019/20. A shortfall of -1,922 affordable dwellings has arisen in the five year period, equivalent to -384 per annum.
- 6.12 The 2018 AHNA is the most recent assessment of affordable housing need, requiring 391 affordable dwellings per annum between 2018/19 and 2021/22. A shortfall of -1,291 affordable dwellings has arisen in first four years of the 2018 AHNA period, equivalent to -323 per annum.

¹⁷ Paragraph: 015 Reference ID: 70-015-20210524

- 6.13 Given the recognised shortfall in affordable housing across Tandridge District, the application proposals provide an affordable housing contribution which would contribute significantly towards addressing this key corporate priority.

Affordability

- 6.14 In addition to the current shortfalls in delivery against the objectively assessed need for affordable housing identified in the 2008 SHMA, 2015 AHNA and 2018 AHNA, other indicators further point to an affordability crisis in Tandridge District.
- 6.15 Set out below are the key findings in respect of affordability across Tandridge District:

Housing Needs

- The Council's Freedom of Information response confirms that as at 31st March 2023 there were 1,910 households on the Housing Register. This represents a 7% increase in a single year from 1,788 households at 31 March 2022 (which itself was a 4% increase from 1,718 households at 31 March 2021).
- In addition, the wait to be housed in an affordable home within the area ranges from 662 days for a 1-bed affordable home through to 1,536 days for a 3-bed+ affordable home.
- DLUHC statutory homelessness data shows that in the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 225 households in need of homelessness prevention duty, and a further 100 households in need of relief duty from the Council.

Private Rents

- The average lower quartile monthly rent in Tandridge District in 2021/22 was £995 pcm. This represents a 24% increase from 2013/14 (when data was first available) where average lower quartile monthly rents stood at £800 pcm.
- A lower quartile rent of £995 pcm in 2021/22 is 25% higher than the South East figure of £775 pcm and 67% higher than the national figure of £595 pcm.

House Prices

- A 2022 lower quartile income to house price ratio of 16.29 in Tandridge District stands significantly above the national average of 7.37 (+121%) and the South East average of 10.69 (+52%).
- For context, a ratio of 16.29 in Tandridge District is the fourth highest in the South East region, from a total of 64 local authorities.

- In 2022 lower quartile house prices in Bletchingley & Nutfield Ward (£400,500) were 10% higher than across Tandridge District (£365,000), 53% higher than across the South East (£261,000) and 123% higher than the national figure (£180,000).
- 6.16 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Bletchingley and Nutfield District as well as across Tandridge District more generally.
- 6.17 This demonstrates an acute need for affordable housing in Tandridge District and one which the Council and decision takers need to do as much as possible to seek to address as required to do so, proactively, by the NPPF (2023, para 38).

Conclusions

- 6.18 There are serious and persistent affordability challenges across Tandridge District. This is exemplified by the affordability indicators which show a poor and worsening affordability across Tandridge District.
- 6.19 It is the opinion of Tetlow King Planning that there is an acute housing crisis in Tandridge District, with a lower quartile house price to average income ratio of 16.29. 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 262% higher than that and rising.
- 6.20 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time on the waiting list and 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:
- Enhanced offer of 45% (up to 74 dwellings) of the C3 dwellings provided as affordable housing;
 - Policy compliant tenure mix and split;
 - 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 74 affordable dwellings on this site to help those in acute need in Tandridge District should be afforded **very substantial weight** in the determination of this application.
- 6.23 **Tetlow King Planning therefore recommends that the proposed development is granted consent**, to enable the prompt delivery of much-needed affordable housing.

Appendix TKP1

Freedom of Information Response (29 June 2023 & 16 August 2023)



Nathan Price

From: Nathan Price
Sent: 29 June 2023 10:18
To: freedomofinformation@tandridge.gov.uk
Cc: Conor Layton
Subject: Freedom of Information Request - Housing Data

Dear Sir/Madam,

I hope this email finds you well. I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in Nutfield, as well as Tandridge District Council.

Please see below the FOI request. Please let me know if you have any queries or require any clarification; I look forward to hearing from you within the relevant timescales.

Confirmation of receipt would be greatly appreciated.

Freedom of Information Request below

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

Questions 1 to 7 of this request relate to data held by the Housing Department.
Questions 8 to 11 of this request relate to data held by the Planning Department.

Dear Sir/Madam,

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

Questions 1 to 9 of this request relate to data held by the Housing Department.
Questions 10 to 13 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2023.
2. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:
 - a. 1-bed affordable dwelling;
 - b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.
3. The total number of households on the Council's Housing Register at 31 March 2023 specifying the following locations as their preferred choice of location:

| Location | Household Preferences (31 March 2023) |
|----------|--|
| Nutfield | |

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

| Type of affordable property | Average Bids Per Property (1 April 2022 to 31 March 2023) |
|-----------------------------|--|
| | Nutfield |
| 1-bed affordable dwelling | |
| 2-bed affordable dwelling | |
| 3-bed affordable dwelling | |
| 4+ bed affordable dwelling | |

Social Housing Stock

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

| Location | Total Social Housing Stock (31 March 2023) |
|----------|---|
| Nutfield | |

Social Housing Lettings

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

| Location | Social Housing Lettings | |
|----------|----------------------------------|----------------------------------|
| | 1 April 2021 to 31 March 2022 | 1 April 2022 to 31 March 2023 |
| Nutfield | | |

Temporary Accommodation

7. The number of households on the Housing Register housed in temporary accommodation within and outside the Tandridge District Council region on the following dates:

| Households in Temporary Accommodation | 31 March 2023 |
|--|---------------|
| Households Housed within Tandridge District Council | |
| Households Housed outside Tandridge District Council | |
| Total Households | |

Housing Completions

8. The number of NET housing completions in the Tandridge District Council region for the monitoring year 2022/23.
9. The number of NET affordable housing completions in the Tandridge District Council region for the monitoring year 2022/23.
10. The number of NET housing completions in Nutfield for the monitoring year 2022/23.
11. The number of NET affordable housing completions in Nutfield for the monitoring year 2022/23.

Glossary of Terms

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

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

I look forward to hearing from you. If there are any issues with providing any of the data then please get in touch.

Kind regards,

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

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

1910

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

1. 1-bed affordable dwelling;

The majority (50%) of 1-bed properties let during 2022/23 were allocated to applicants in Band C of the Council's Housing Register. The average waiting time in this band was 851 days. 27% of 1-bed properties let during 2022/2023 were allocated to applicants in Band B. The average waiting item in this band was 473 days.

2. 2-bed affordable dwelling;

The majority (90%) of 2-bed properties let during 2022/23 were allocated to applicants in Band B of the Council's Housing Register. The average waiting time in the band was 856 days.

3. 3-bed affordable dwelling; and

The majority (90%) of 3-bed properties let during 2022/23 were allocated to applicants in Band B of the Council's Housing Register. The average waiting time in this band was 1536 days.

4. A 4+ bed affordable dwelling.

No 4-bed properties were let during 2022/23

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

| Location | Household Preferences |
|----------|-----------------------|
| | (31 March 2023) |
| Nutfield | 156 |

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

Specific information on whether advertised properties were let at affordable rent or social rent is not held by the Council. Therefore, the figures below include properties let at both social and affordable rents.

| Type of affordable property | Average Bids Per Property (1 April 2022 to 31 March 2023) |
|-----------------------------|--|
| | Nutfield |
| 1-bed affordable dwelling | 8 |
| 2-bed affordable dwelling | 0 |
| 3-bed affordable dwelling | 0 |
| 4+ bed affordable dwelling | 0 |

Social Housing Stock

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

| Location | Total Social Housing Stock (31 March 2023) |
|----------|---|
| Nutfield | 83 |

Social Housing Lettings

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

| Location | Social Housing Lettings | |
|----------|-------------------------|-----------------|
| | 1 April 2021 to | 1 April 2022 to |
| | 31 March 2022 | 31 March 2023 |
| Nutfield | 5 | 3 |

Temporary Accommodation

7. The number of households on the Housing Register housed in temporary accommodation within and outside the Tandridge District Council region on the following dates:

| Households in Temporary Accommodation | 31 March 2023 |
|--|---------------|
| Households Housed within Tandridge District Council | 42 |
| Households Housed outside Tandridge District Council | 10 |
| Total Households | 52 |

Appendix 2

Independent newspaper Article (June 2020)



Independent PremiumUK news

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

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



Sunday 21 June 2020 09:18

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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