

Appeal by Countryside Partnerships (Eastern Home Counties)

Land at Brook Farm adjoining 451-469 Daws Heath Road Hadleigh Essex

Appeal Ref: APP/M1520/W/24/3351658

LPA Ref: 22/0484/FUL

Proof of Evidence – Affordable Housing Matters

Annie Gingell (BSc (Hons) MSc MRTPI)

December 2024

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Our reference

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1. Introduction

- 1.1 My name is Annie Gingell, and I am an Associate Director at Turley. I am instructed to present affordable housing evidence at this Inquiry by Countryside Partnerships (Eastern Home Counties), herein referred to as 'the Appellant.'
- 1.2 This Appeal follows Castle Point Borough Council's ('the Council') refusal of a full planning application for 173 dwellings on Land at Brook Farm Daws Heath Road Hadleigh Essex.
- 1.3 My evidence specifically addresses affordable housing provision and the weight that should be given to this benefit in the planning balance, taking into account evidence of local needs and delivery as well as a range of other affordable housing need and affordability indicators.
- 1.4 As part of my evidence, I have obtained and relied upon data from the Council through a Freedom of Information (FOI) request, available at **Appendix AG1**.
- 1.5 The evidence which I have prepared and provide for this Appeal (PINS Reference No. APP/M1520/W/24/3351658) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

Qualifications

- 1.6 I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development also from Cardiff University (2020).
- 1.7 I am a chartered member of the Royal Town Planning Institute (RTPI) with over 10 years professional experience in the field of town planning and housing.
- 1.8 I joined Turley in October 2024 as an Associate Director. Before my role at Turley, I was an Associate Director and Head of Affordable Housing at Tetlow King Planning, having joined the company in 2017 as a Graduate Planner. Prior to this I worked as a Planning Policy Officer in Local Government at Bristol City Council.
- 1.9 During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East of England, and London. I have also acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country.

Scope of Evidence

- 1.10 My evidence comprises this Proof of Evidence, associated Core Documents, and an accompanying volume of Appendices. The Core Documents referred to in this evidence are listed at **Appendix AG2**.
- 1.11 This Proof of Evidence comprises the following sections:

- Section 2 - Affordable Housing Offer
- Section 3 - Relevant Planning Policy and Guidance
- Section 4 - Affordable Housing Needs
- Section 5 - Past Affordable Housing Delivery
- Section 6 - Market Conditions
- Section 7 - Future Supply of Affordable Housing
- Section 8 - Justification and Associated Benefits
- Section 9 - Summary

1.12 My evidence should be read alongside the main Planning Evidence of Matthew Wood (Phase 2 Planning) (CD12.6) and Five-Year Housing Land Supply Evidence of Ben Pycroft (Emery Planning) (CD12.3). It should also be read alongside the overarching Statement of Common Ground (SoCG) which has been agreed between the parties (CD10.1).

2. Affordable Housing Offer

- 2.1 The proposed development is for 173 dwellings, of which 50% (87 dwellings) are to be provided on-site as affordable housing.
- 2.2 This level of provision exceeds expectations of paragraph 4.28¹ of the Local Plan (1998) and the Developer Contributions Guidance Supplementary Planning Document (2023) which seeks 35%² provision from qualifying developments.
- 2.3 This level of provision meets the 'Golden Rules' for Green Belt development as set out in the National Planning Policy Framework (NPPF) published in December 2024 which requires 50% of the housing to be affordable on such sites.
- 2.4 The affordable housing units on site will comprise the following tenures:
- 50% Affordable Rented (44 homes); and
 - 50% Shared Ownership (43 homes).
- 2.5 The tenure split aligns with the recommendations provided by the Housing Development and Finance Manager in their comments dated 7 September 2024 (CD7.12).
- 2.6 The affordable housing provision will be secured through a Section 106 Planning Obligation.
- 2.7 An Expression of Interest from Moat Homes Limited is included at **Appendix AG3** which demonstrates that there is confirmed interest from Registered Providers (RPs) in delivering the proposed affordable homes at the appeal site in the event the appeal is allowed.

¹ Advises that the Council will seek up to 20% provision of affordable housing on sites of over 40 dwellings. This is supporting text, not policy.

² This is supplementary guidance, not adopted policy.

3. Relevant Planning Policy and Guidance

Introduction

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan as a whole unless other material considerations indicate otherwise.
- 3.2 This section identifies the relevant adopted and emerging Development Plan documents for the provision of affordable housing at the appeal site; as well as any pertinent material considerations. It also addresses the relevant policy context set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

The Development Plan

Local Plan (November 1998) – CD4.1

- 3.3 The Local Plan was adopted in November 1998 and its policies were ‘saved’ by direction of the Secretary of State (SoS) in September 2007. The Local Plan covers the 15-year period from 1986 to 2001, in accordance with the Essex and Southend-on-Sea Structure Plan (which expired in September 2007).
- 3.4 At paragraph 4.28, the Plan sets out an expectation that up to 20% of all dwellings built on large sites (defined as 40 dwellings or more) will be affordable tenures. This is supporting text and not policy.
- 3.5 It should also be noted that Annex 2 of NPPF defines major development for housing (i.e., large sites) as 10 dwellings³ or more. Paragraph 65 of the NPPF makes clear that:

“Provision of affordable housing should not be sought from residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”

- 3.6 Policy H7 ‘Affordable Housing’ serves as the main policy for affordable housing in the Borough. It does not state the amount of affordable housing to be sought, the tenure split or the applicable site size threshold. The policy states:

“Where appropriate the Council will seek to negotiate a proportion of affordable housing for rent, shared ownership, or outright sale, where appropriate to the scale of development schemes. The number of affordable dwellings to be provided will be dependent upon the size of the site, its location, and any substantial costs associated with the provision of other necessary infrastructure, and will be determined by the Council, following negotiation with the applicant.”

³ or the site has an area of 0.5 hectares or more.

- 3.7 The policy wording goes on to explain that affordable housing will be exempt from the Council's plot size requirements (since revoked) but will be required to meet all other standards for residential development.

Other Material Considerations

National Planning Policy Framework (December 2024)

- 3.8 The latest NPPF was published on 12 December 2024 and outlines the government's planning policies for delivering affordable housing in England within the broader context of sustainable development (paragraph 8) and in support of the Government's objective of significantly boosting the supply of homes (paragraph 61).
- 3.9 Paragraph 8b highlights that the social objective of sustainable development is to *"support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations"*. Whilst paragraph 60 makes clear that:

"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed [...]. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community" (emphasis added).

- 3.10 A significant update pertains to Paragraph 11dii, which outlines the presumption in favour of sustainable development where policies are out of date or where a local planning authority cannot demonstrate a five-year supply of deliverable housing sites. Paragraph 11dii emphasizes that in such circumstances permission should be granted unless:

"(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination" (emphasis added).

- 3.11 Key provisions in respect of affordable housing include:

- Meeting Housing Needs: Paragraph 61 is clear that in order to support the Government's objective of significantly boosting the supply of homes, the overall aim should be to meet an area's identified housing need in full.
- Assessing Housing Needs: Paragraph 62 emphasises that planning policies should be informed by a local housing needs assessment, whilst paragraph 63 is clear that the size, type, and tenure of housing required for different groups, including those requiring affordable housing should be assessed and reflected in planning policies.

- Affordable Housing Provision: Paragraph 64 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified.
 - Thresholds for Provision: Paragraph 65 indicates that affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas where policies may set out a lower threshold of five units or fewer.
 - Affordable Home Ownership: Paragraph 66 expects that, for major developments involving the provision of housing, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.
 - Mixed Tenure Sites: Paragraph 71 is clear that mixed tenure sites can provide a range of benefits, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported).
 - Definition of Affordable Housing: Annex 2 of the NPPF defines affordable housing as housing for sale or rent for those whose needs are not met by the market.
- 3.12 These provisions are designed to ensure that affordable housing is not only integrated into new developments but also aligns with the evolving needs of diverse community groups, fostering sustainable and inclusive growth for present and future generations.
- 3.13 A further notable update is in relation to the 'Golden Rules' for Green Belt development set out in paragraphs 156- 157. Key provisions in respect of affordable housing include:
- Affordable Housing Contributions: Paragraph 156 states that major housing development on land released from the Green Belt, or on Green Belt sites subject to a planning application, must provide affordable housing contributions in line with either adopted development plan policies or, where such policies are not yet updated, the requirements of paragraph 157.
 - Minimum Affordable Housing Requirement: Paragraph 157 requires affordable housing contributions to be set at 15 percentage points above the highest existing policy requirement, capped at 50%. Where no affordable housing policy exists, a default contribution of 50% applies.
 - Viability Assessments: Paragraph 157 is clear that for land within or released from the Green Belt, site-specific viability assessments must adhere to national planning practice guidance on viability.
- 3.14 These provisions ensure that affordable housing delivery remains a core priority within Green Belt developments, balancing housing need with sustainable growth objectives while addressing local and national policy requirements.

National Planning Practice Guidance (2014, Ongoing Updates)

- 3.15 The NPPG is an online resource that provides detailed guidance to support the implementation and application of the NPPF. It was first published in March 2014 and is regularly updated to reflect changes in planning legislation, policies, and best practices. **Appendix AG4** sets out the paragraphs of the NPPG of particular relevance to affordable housing.

Affordable Housing Developer Contributions Guidance Supplementary Planning Document (2023) – CD5.2

- 3.16 The Affordable Housing Developer Contributions Guidance Supplementary Planning Document ('the Affordable Housing SPD') was adopted by the Council in March 2023. The Affordable Housing SPD sets out the types of developer contributions and/or planning obligations required for affordable housing. It also highlights the process for how affordable housing will be sought and delivered.
- 3.17 Section 2 considers the relevant policy context noting the NPPF Annex 2 definition of affordable housing and the introduction of First Homes as an affordable tenure by the Government in 2021. Paragraph 2.1.4 sets out that the Council will accept First Homes as part of the affordable housing mix in line with Government policy.
- 3.18 Affordable housing requirements are dealt with in Section 5. Paragraph 5.1.1 makes clear that affordable housing will be sought from developments resulting in ten or more net additional homes in line with the NPPF.
- 3.19 At paragraph 5.3.3 the SPD notes that the Council will seek 35% on site provision from qualifying developments. The preceding paragraph notes that this requirement is based on evidence collected in the withdrawn Local Plan (CIL Viability Study 2020 [DV-005]) which found that this requirement is acceptable in most cases. This requirement does not feature in the adopted Development Plan.
- 3.20 In this context it is important to highlight that SPD's cannot introduce new policy. Annex 2 of the NPPF is clear that SPDs are documents that *"add further detail to the policies in the development plan"* going on to note that they *"are capable of being a material consideration in planning decisions but are not part of the development plan."* The NPPG⁴ builds on this stating that *"As they do not form part of the development plan, they cannot introduce new planning policies into the development plan."*

Emerging Castle Point Plan – CD7.21

- 3.21 On 17 July 2024, the Council approved to proceed to a formal Regulation 18 public consultation on the Issues and Options Consultation Document July 2024 and associated documents. The consultation ran until 19 September 2024 with a Regulation 19 consultation expected in early 2025.
- 3.22 The consultation document does not set out any emerging policy relating to affordable housing, rather it seeks responses on range of questions relating to policy options for

⁴ Paragraph: 008 Reference ID: 61-008-20190315

affordable housing provision, with page 56 noting that *“More social housing and affordable housing is required, with private rental properties not being affordable to many in the borough”*. It also acknowledges the findings of the Castle Point Local Housing Needs Assessment (2023) which is discussed in detail at Section 4 of this evidence.

- 3.23 The ‘Castle Point Plan Timetable’ outlines the process for developing and adopting the Plan. It indicates that a Regulation 19 consultation is expected between January 2025 and March 2025 with submission to the SoS expected in April 2025. It anticipates adoption in March 2026. Given the early stage of the Plan, it holds limited weight in the determination of the Appeal Proposals.

Corporate Documents

- 3.24 The Council’s corporate documents identify the delivery of affordable housing as a high corporate priority. These include the following documents:
- Corporate Plan 2021-2024 (CD7.11); and
 - Castle Point Homelessness and Rough Sleeping Strategy 2019-2024 (CD7.13).
- 3.25 Relevant quotes from each of these documents are referred to throughout this evidence.

Conclusions

- 3.26 There is currently an absence of up to date affordable housing policy in Castle Point. The adopted Development Plan and its associated evidence base is some 16 years old. Whilst not contained within policy, the Local Plan seeks 20% affordable housing provision from qualifying developments. The affordable housing contribution proposed at the appeal site is in excess of this requirement, making a 50% contribution (87 dwellings) which meets the ‘Golden Rules’ for Green Belt development as set out in the NPPF (2024).
- 3.27 The Councils Affordable Housing SPD published in March 2023 seeks to introduce a requirement for qualifying developments to provide 35% on site affordable housing provision. This requirement does not feature in the adopted Development Plan and given SPDs cannot introduce new policy it can only be considered advisory. Irrespective of this the appeal proposals exceed this advisory threshold.
- 3.28 As such there is a local affordable housing policy lacuna in Castle Point. This will severely limit the Council's ability to secure affordable housing contributions secure much needed affordable housing both now and in the future. This issue is further compounded by the fact that the emerging Local Plan is not envisaged for adoption until March 2026 at the earliest. This underscores the urgency of addressing the Borough's affordable housing needs through developments like the Appeal Site.

4. Affordable Housing Needs

Introduction

- 4.1 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 Borough.
- 4.2 In addition to formal assessments, this section examines other indicators of affordable housing need such as the Housing Register, waiting times, and homelessness rates. These real-world metrics offer additional insights and perspective on the pressing need for affordable housing in Castle Point.

Assessments of Affordable Housing Need

- 4.3 Since the adoption of the Local Plan in 1998 there have been significant changes to national policy in respect of the provision of affordable housing. Key changes include the introduction of the NPPF in 2012 and subsequent revisions which have broadened the definition of affordable housing. As such the evidence base underpinning the Local Plan is not considered relevant to the Appeal Proposals.
- 4.4 It is therefore necessary to consider more recently published assessments of affordable housing need for the Borough, particularly as the definition of affordable housing has evolved over time. Over the past eight years, the Council has commissioned five assessments, each of which provides insights into affordable housing needs. These assessments are reviewed below to provide an overview of their findings and context.

South Essex Strategic Housing Market Assessment (2016) and Addendum (2017) – CD7.22 and CD7.23

- 4.5 The South Essex Strategic Housing Market Assessment published in May 2016 ('the 2016 SHMA') was commissioned by Thames Gateway South Essex authorities of Basildon, Castle Point, Rochford, Southend-on-Sea, and Thurrock as part of the evidence base for their respective emerging Local Plans.
- 4.6 The 2016 SHMA calculates housing need for the respective authorities over the 23-year period from 2014/15 to 2036/37.
- 4.7 Figure 6.13 on page 145 calculates an affordable housing need of 298 net dwellings per annum over the first five years of the period (2014/15 to 2018/19) to clear the existing back log (62 dwellings per annum). This figure then falls to 236 net affordable dwellings per annum over the remainder of the period (2019/20 to 2036/37) to meet newly arising need.
- 4.8 An addendum to the 2016 SHMA was published in May 2017 ('the 2017 SHMA') which takes account of updated data sets and national guidance. Paragraph 4 makes clear that *"The addendum does not represent a comprehensive update of all elements of the SHMA, and is intended to be read alongside the earlier document"*.

- 4.9 Table 3.2 in Appendix 3 calculates a revised affordable housing need of 353 net dwellings per annum over the first five years of the period (2014/15 to 2018/19) to clear the existing back log (62 dwellings per annum). This figure then falls to 291 net affordable dwellings per annum over the remainder of the period (2019/20 to 2036/37) to meet newly arising need.
- 4.10 It is important to note that both of these assessments were undertaken prior to the implementation of the updated Annex 2 definition of affordable housing in the revised 2018 NPPF (now July 2023 version); and therefore, do not make provision for the range of affordable routes to home ownership included within the current definition of affordable housing. As such the findings should be treated as minimums.

South Essex Housing Needs Assessment (2022) – CD7.7

- 4.11 The South Essex Housing Needs Assessment published in June 2022 ('the 2022 HNA') was commissioned by the South Essex authorities of Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea, and Thurrock. It updates and replaces the findings of the 2016 and 2017 SHMA.
- 4.12 The 2022 HNA calculates housing need for the respective authorities over the 19-year period from 2021/22 to 2039/40.
- 4.13 Table 6.7 on page 80 identifies need for 326 net affordable dwellings per annum between 2021/22 and 2039/40 in Castle Point, equivalent to 6,194 affordable dwellings over the 19-year period. Unlike the previous SHMAs it seeks to address the backlog over the full assessment period (Liverpool) rather than over the first five years (Sedgefield).
- 4.14 The 2022 HNA formed part of the evidence base for the withdrawn Castle Point Local Plan. Whilst the Plan (and its evidence base) was found sound by an independent Inspector; in June 2022, the Council resolved to withdraw the Local Plan against the advice of its professional officers.

Castle Point Local Housing Needs Assessment (2023) – CD7.9

- 4.15 The Castle Point Local Housing Needs Assessment published in December 2023 ('2023 LHNA') was commissioned by the Council as part of the evidence base for the emerging Local Plan. It calculates housing need for the Borough over the 20-year period from 2023/24 to 2042/43.
- 4.16 Figure 45 on page 60 identifies a need for 210 net affordable dwellings per annum between 2023/24 and 2042/43 in Castle Point, equivalent to 4,208⁵ affordable dwellings over the 20-year period.
- 4.17 The 2023 LHNA provides a further calculation at Figure 47 on page 64 which seeks to calculate affordable housing need based on a household's ability to 'access affordable home ownership' via the First Homes tenure. As accepted at paragraph 5.60, "*Neither*

⁵ Figures do not sum due to rounding

the NPPF nor PPG identify that any affordability criteria should be applied to those households who aspire to homeownership but cannot afford to buy their own home.”

- 4.18 The NPPF is clear that affordable housing need is defined by households whose needs are not met by the market, without applying additional affordability criteria to those aspiring to homeownership. As such, this figure is not calculated in line with national policy and should not be relied upon as an objective measure of affordable housing need.
- 4.19 Furthermore, the NPPG⁶ highlights that the First Homes WMS gives local authorities and neighbourhood planning groups the discretion to require a higher minimum discount of either 40% or 50% if they can demonstrate a need for this. It goes on to note that:

“As part of their plan-making process, local planning authorities should undertake a housing need assessment to take into account the need for a range of housing types and tenures, including various affordable housing tenures (such as First Homes). Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidence-based planning judgement to be made about the need for a higher minimum discount level in the area, and how it can meet the needs of different demographic and social groups.”

- 4.20 It will therefore be a policy decision for the Council during the emerging Local Plan process whether to utilize mechanisms, such as those outlined in the First Homes WMS, to meet the affordable housing needs identified in the 2023 LHNA in full.

Indicators of Affordable Housing Need

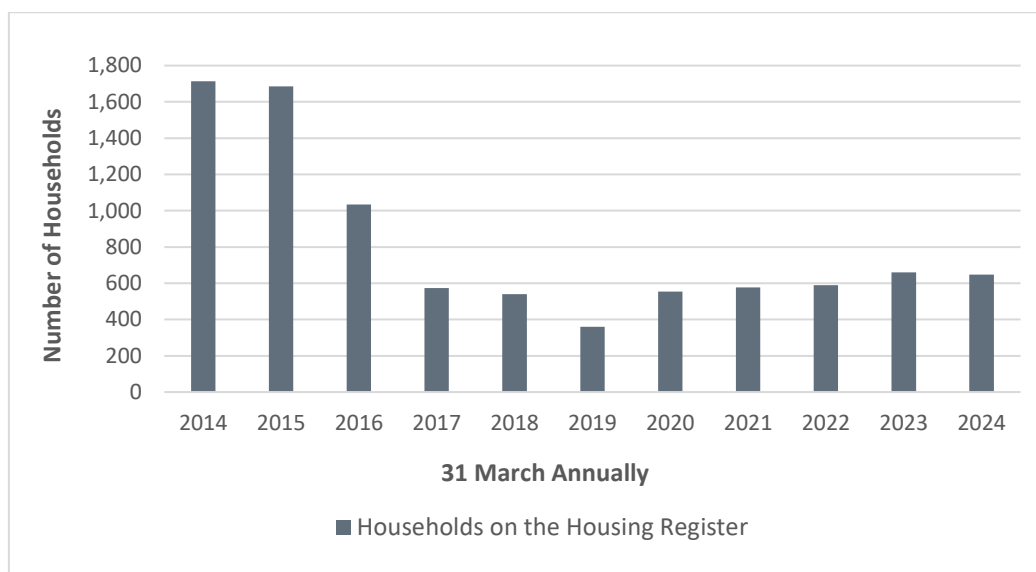
- 4.21 Key indicators like the number of households on the Council's Housing Register, homelessness rates and households housed in temporary accommodation all serve as crucial markers of current affordable housing need in the Borough.
- 4.22 The data in this section has been obtained from Ministry of Housing Communities & Local Government (MHCLG) published statistics and incorporates data provided in the Council's FOI response (**Appendix AG1**).

Housing Register

- 4.23 On 31 March 2024 there were 648 households on the Council Housing Register, the second highest number of households since 2017. Figure 4.1 below illustrates the trend in the number of households on the Housing Register since 2014.

⁶ Paragraph: 004 Reference ID: 70-004-20210524

Figure 4.1: Number of Households on the Housing Register, 2014 to 2024



Source: MHCLG Open Data.

- 4.24 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 MHCLG data set acknowledges that *“The Localism Act 2011, has contributed to a decrease in the size of waiting lists, as it allowed local authorities to set their own qualification criteria”*.
- 4.25 Figure 4.1 indicates a sharp decline in the number of households on the Council’s Housing Register between 2015 and 2016, followed by an additional decrease in 2017. This apparent reduction in demand reflects changes made by the Council to its Housing Allocations Policy criteria, rather than a genuine decrease in housing need.
- 4.26 The Council’s FOI response (**Appendix AG1**) indicates that revised Allocations Policies were published in 2012, 2018, 2020 and 2023. However, in a different FOI response (**Appendix AG5**) provided in July 2022 the Council advised that changes had also occurred between 2015 and 2017, explicitly acknowledging the related reductions.
- 4.27 Irrespective of the fluctuations in the total number of households on the Housing Register, Figure 4.1 demonstrates that the total number of households on the Housing Register has been increasing since 2019. The most significant changes in the number of households on the Register has coincided with changes to the Councils Housing Allocation policy, whilst other fluctuation can be attributed to the Council periodically removing ineligible applicants⁷.
- 4.28 It however important not to lose sight of the fact that each of the 648 households on the Council’s Housing Register are real people in need of an affordable home *now*. In an appeal decision at Oxford Brookes University Campus at Wheatley, (CD8.3, p74,

⁷ Paragraph 5.5.5 of the Affordable Housing SPD highlights that the Council reviews its Housing Register annually.

[13.101]) the Inspector asserted at paragraph 13.101 of his report that in the context of a lengthy housing register of 2,421 households:

“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses” (emphasis added).

Waiting Times

- 4.29 The Council’s Freedom of Information response (**Appendix AG1**) shows that successful applicants for affordable housing face lengthy and increasing waits for an affordable home in Castle Point.
- 4.30 Table 4.1 illustrates that, based on the dwelling size, successful applicants in the 2023/24 monitoring period experienced average waiting times ranging from 28 months to 92 months for an affordable home.

Table 4.1: Housing Register Average Waiting Times, March 2024

Size of Affordable Property	Average Waiting Time to be Housed (31 March 2024)
1-bedroom home	28 months
2-bedroom home	37 months
3-bedroom home	51 months
4+ bedroom home	92 months

Source: Freedom of Information response

- 4.31 It is important to recognise that these figures represent averages, meaning that some households may have experienced waiting times even longer than those indicated. Furthermore, these statistics reflect only the waiting periods of successful applicants, who are often in the highest priority need. Households with lower priority needs are likely to face substantially longer waiting times, further highlighting the disparities in access to affordable housing.

Lettings and Bids

- 4.32 The appeal site is located in St. Michael’s Ward which borders Thundersley North Ward, Thundersley South Ward, and Hadleigh St. James Ward.
- 4.33 Table 4.2 below demonstrates the average number of bids per property in these wards over the 2023/24 monitoring period for a range of types of affordable property. Hadleigh St. James Ward is not included in the table as there were no properties let in the ward over the period.

Table 4.2: Bids Per Property, April 2023 to March 2024

Type of affordable property	St Michael's Ward		Thundersley North Ward		Thundersley South Ward	
	No. advertised	Avg. Bids	No. advertised	Avg. Bids	No. advertised	Avg. Bids
1-bed affordable property	7 (NB all units within our sheltered schemes)	57	1	162	5	113
2-bed affordable property	1 sheltered housing unit	3			2	75
3-bed affordable property					1	85
4+ bed affordable property						
Totals	8	60	1	162	8	273

Source: Freedom of Information response

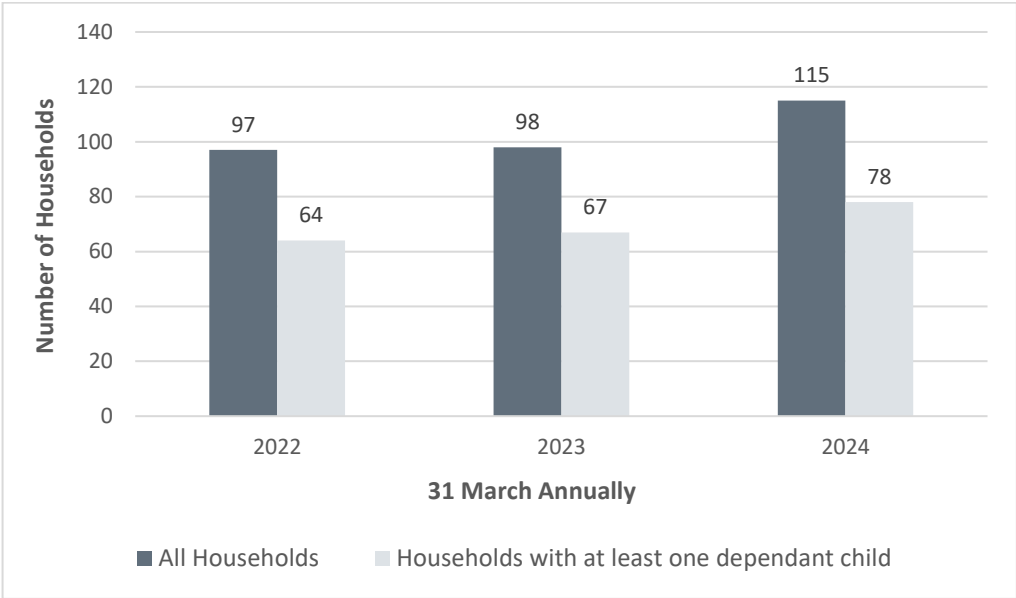
- 4.34 Table 4.2 demonstrates that between 1 April 2023 to 31 March 2024 there were an average of 57 bids per 1-bed affordable dwelling put up for let in St Michael's Ward, 3 average bids per 2-bed affordable dwelling, and no advertised 3-bed or 4+ bed affordable dwellings. It is notable that all properties let over the period were sheltered housing.
- 4.35 In Thundersley North Ward, there were an average of 162 bids per 1-bed affordable dwelling, with no 2-bed, 3-bed, or 4+ bed affordable dwellings advertised during this period. In Thundersley South Ward, there were an average of 113 bids per 1-bed affordable dwelling, 75 average bids per 2-bed affordable dwelling, and 85 average bids per 3-bed affordable dwelling, with no 4+ bed affordable dwellings advertised
- 4.36 For every successful letting, there are tens, sometimes hundreds, of households left without access to an affordable home, highlighting the significant gap between demand and supply. This underscores an urgent and pressing need for increased availability of affordable housing to address the unmet demand and support those waiting for a place to call home.

Temporary Accommodation

- 4.37 Temporary accommodation is intended to provide an immediate, short-term housing solution for individuals and families facing homelessness or urgent housing needs.

4.38 Figure 4.2 below shows the total number of households and households with children within temporary accommodation in the Borough between 2022 (first produced) and 2024. It highlights that on 31 March 2024 there were 115 households in temporary accommodation, 68% of which had at least one dependent child.

Figure 4.2: Households in temporary accommodation, 2022 to 2024



Source: MHCLG Open Data.

4.39 The data demonstrates a 19% increase in the number of households in temporary accommodation over the three-year period. Whilst the proportion of households with at least one dependent child has remained similar, the total number of households with children has increased by 22% over the period. On 31 March 2024 there were 169 children housed in temporary accommodation by the Council. Table 4.1 below shows the length of time households had been in temporary accommodation.

Table 4.3: Number households in temporary accommodation by length of time, 31 March 2024

Length of time	Less than a year	1 to 2 years	2 to 5 years	5+ years	Total
Number of Households	57	21	28	9	115
%age of Total	50%	18%	24%	8%	100%

Source: MHCLG Open Data.

4.40 Table 4.3 highlights that 50% of households had spent at least a year in temporary accommodation. This means that those in need of affordable housing are spending extended periods of time in accommodation which is unlikely to be suited to their needs. As demonstrated by Table 4.4 below just 5% of households in 2023/24 were housed in Local authority or Housing Association stock indicating significant taxpayer spend on private sector solutions.

Table 4.4: Number households in temporary accommodation by accommodation type, 31 March 2024

Accommodation Type	Number of Households	%age of Total
Bed and breakfast hotels (including shared annexes)	10	9%
Nightly paid, privately managed accommodation, self-contained	31	27%
Hostels (including reception centres, emergency units and refuges)	18	16%
Leased Private sector accommodation	49	43%
Local authority or Housing association stock	6	5%
Any other type of temporary accommodation	1	1%
Total	115	100%

Source: MHCLG Open Data.

- 4.41 The data in Table 4.4 shows that the majority of households in temporary accommodation (95%) are placed in private sector solutions, including leased private sector accommodation (43%), nightly paid, privately managed self-contained units (27%), and bed and breakfast hotels (9%). Hostels account for 16% of temporary accommodation placements, noting the use of shared facilities for some households.
- 4.42 The Councils Homeless and Rough Sleeping Strategy 2019 -2024 (CD7.13) highlights on pages 19 and 20 that Council has access to three Bed and Breakfast establishments within a neighbouring authority and privately managed hostel within a neighbouring authority and that 10 of its private sector leases are in Basildon. This means that some of the Councils most vulnerable residents are being housed away from their support networks. The strategy also notes at page 4 that *“Homeless households may give up their jobs prior to moving into temporary accommodation because they have had to move further away from their place of work”*.
- 4.43 The above evidence underscores the pressing need for an increase in rented affordable housing stock to reduce dependency on costly private sector accommodations and provide more stable and suitable housing solutions for households in temporary accommodation. Such an increase would not only alleviate financial pressures on public resources but also offer vulnerable households a greater sense of security and community stability, contributing to improved long-term social and economic outcomes.

Homelessness

- 4.44 Homelessness is a critical social challenge, reflecting broader issues of housing affordability, availability, and support for vulnerable populations. Authorities have a statutory duty under the Homelessness Reduction Act 2017 to prevent and relieve homelessness:
- 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.

- 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.

4.45 As demonstrated by Table 4.5 below, in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 106 households in need of homelessness prevention duty, and a further 141 households in need of relief duty from the Council.

Table 4.5: Number households owed a homeless duty by reason for loss of last settled home, 1 April 2023 to 31 March 2024

Reason for loss of last settled home	Prevention duty		Relief duty	
	No. Households	%age	No. Households	%age
Family or friends no longer willing or able to accommodate	20	19%	57	40%
End of private rented tenancy - assured shorthold	78	74%	30	21%
Domestic abuse	3	3%	16	11%
Non-violent relationship breakdown with partner	2	2%	10	7%
End of social rented tenancy	0	0%	3	2%
End of private rented tenancy - not assured shorthold	0	0%	6	4%
Other violence or harassment	0	0%	2	1%
Left institution with no accommodation available	0	0%	4	3%
Required to leave accommodation provided by Home Office as asylum support	0	0%	1	1%
Other reasons / not known	3	3%	12	9%
Totals	106	100%	141	100%

Source: MHCLG Open Data.

- 4.46 The data highlights distinct patterns in the reasons for the loss of settled homes among households receiving Prevention Duty and Relief Duty support. For those under Prevention Duty, the predominant cause is the end of private rented tenancy (assured shorthold), accounting for 74% of cases. In contrast, the breakdown of informal living arrangements with family or friends no longer willing or able to accommodate is a secondary issue under Prevention Duty (19%), reflecting a less urgent but still a notable risk factor for future housing instability.
- 4.47 Under Relief Duty, the data shifts to emphasize crisis driven causes. The breakdown of arrangements with family or friends becomes the leading factor (40%), highlighting the reliance on informal housing arrangements as a last resort. Additionally, domestic abuse (11%) and non-violent relationship breakdowns (7%) represent significant contributors,

underscoring the urgent need for responsive and supportive housing solutions for vulnerable individuals. These findings collectively point to the need for tailored strategies addressing both predictable risks in the private rental sector and immediate crises arising from personal and social breakdowns.

Conclusions

- 4.48 Due to the age of the evidence base underpinning the adopted Development Plan it is necessary to consider more recently published assessments of affordable housing need for the Borough, particularly as the definition of affordable housing has evolved over time. Over the past eight years, the Council has commissioned five assessments, all of which highlight a consistent and substantial demand for affordable housing:
- 2016 SHMA: 298 net dwellings per annum between 2014/15 and 2018/19, falling to 236 net affordable dwellings per annum up to the end of the period in 2036/38.
 - 2017 SHMA: 353 net dwellings per annum between 2014/15 and 2018/19, falling to 291 net affordable dwellings per annum up to the end of the period in 2036/38.
 - 2020 HNA: 326 net affordable dwellings per annum between 2021/22 and 2039/40.
 - 2023 LHNA: 210 net affordable dwellings per annum between 2023/24 and 2042/43.
- 4.49 In addition to formal assessments, real-world indicators such as the Housing Register and homelessness data highlight the tangible impacts of housing shortages in the Borough. As of 31 March 2024, there were 648 households on the Housing Register, the second highest figure since 2017. The total number of households on the Register has been increasing since 2019, reflecting a growing demand for affordable housing.
- 4.50 Temporary accommodation figures reveal further strain, with 115 households housed temporary accommodation in March 2024, a 19% increase over three years, 68% of which had at least one dependent child. Half of these households had spent over a year in temporary accommodation, reflecting prolonged stays in unsuitable housing, while 95% were placed in costly private sector solutions such as leased properties and nightly paid units. Rising numbers of households with dependent children in temporary accommodation illustrate the pressing need for an increase in affordable housing stock.
- 4.51 Homelessness data further underscores the urgency of addressing the shortage of affordable housing facing the Borough. Between April 2023 and March 2024, 106 households were accepted as being owed a Prevention Duty, with 74% of cases linked to the end of private rented tenancies (assured shorthold). During the same period, 141 households were accepted as being owed Relief Duty, with the leading cause being the breakdown of informal housing arrangements, representing 40% of cases. These indicators reflect the human scale of the Borough's housing challenges and underscore the importance of addressing these needs.

5. Past Affordable Housing Delivery

Introduction

- 5.1 This section reviews past rates of affordable housing delivery across Castle Point, revealing significant and persistent shortfalls against identified needs. These findings underscore an urgent and pressing need for a substantial increase in affordable housing provision throughout the Borough.
- 5.2 The analysis in the section is underpinned by the data tables provided at **Appendix AG6**, which have been compiled from Ministry of Housing Communities & Local Government (MHCLG) published statistics.

Additions to Affordable Housing Stock

- 5.3 Since the start of the 2017 SHMA period in 2014/15 and 2022/23 the Council has added a total of 128 gross affordable dwellings to its housing stock, equivalent to just 13 new dwellings per annum. When compared with the total net housing completions figure of 1,142 dwellings, gross affordable housing delivery has represented 11% of additions.
- 5.4 In an October 2024 WMS on 'Social and Affordable Housing', Deputy Prime Minister Angela Rayner MP made clear that:

"These measures to increase affordable housing come alongside changes to the Right to Buy scheme. England's existing social housing supply is depleted every year by the scheme while also disincentivising councils to build new social housing. To address this, the Chancellor will confirm at Budget that councils will be able to retain 100% of the receipts generated by Right to Buy sales. This will enable councils to scale-up delivery of much needed social homes whilst still enabling longstanding tenants to buy their own homes" (emphasis added).

- 5.5 Similarly in her closing speech at the Social Housing Conference on 20 November 2024 the Deputy Prime Minister was clear that:

"I want to say loud and clear that no longer will social housing be seen as an after-thought, or worse actively discouraged."

"It starts by going net positive because we want to build more social homes than we lose. This matters. For the 1.2 million households on the waiting list for a safe and secure home. For the 150,000 children stuck in unsuitable temporary accommodation."

"And as I said, this is personal for me. Because I know that a secure, affordable home is not a luxury or simply nice to have. It's the foundation on which everything else is built." (emphasis added).

- 5.6 Whilst the gross data from MHCLG accounts for new build affordable dwellings and acquisitions from the private sector, it does not account for any reductions in affordable

housing stock due to demolitions or Right to Buy sales from existing Council and Registered Provider (RP) affordable housing portfolios. Table 5.1 below illustrates the effect of Right to Buy sales on gross additions in Castle Point.

Table 5.1: Net Additions to Affordable Housing Stock, 2014/15 to 2023/24

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2014/15	51	11	40
2015/16	0	3	-3
2016/17	16	7	9
2017/18	45	4	41
2018/19	0	5	-5
2019/20	1	5	-4
2020/21	6	5	1
2021/22	0	16	-16
2022/23	0	4	-4
2023/24	9	2	7
Totals	128	62	66
Avg. Pa.	13	6	7

Source: MHCLG Open Data

- 5.7 The data highlights that over the past decade there has been a total of 62 losses to affordable housing stock through the Right to Buy, this represents almost 50% of gross additions. When the effect of the Right to Buy is taken in to account the Council has delivered just 66 net affordable homes since 2014/15, equivalent seven dwellings per annum. This represents only 6% of total net housing additions. This figure is likely to fall even further if demolitions were taken into account⁸.
- 5.8 It should also be noted that the Councils Corporate Plan 2021 – 2024 (CD7.11, p12), identifies the following objective “*We need to have enough quality new homes to support our growing population, minimise homelessness and meet our housing needs as they change over different stages of our lives*”. To meet this objective the Council will “*Increase the number of new affordable homes to 100 per annum by 2025*”. Table 5.1 demonstrates that since 2021/22 the Council have delivered -13 affordable homes.

Net Additions vs Net Needs

- 5.9 When comparison is draw between the affordable housing needs identified in the 2016 and 2017 SHMAs, cumulative shortfalls of 2,604 and 2,879 affordable homes have accrued respectively in the 10-year period between 2014/15 and 2023/24. It is however important to recognise that the finding’s in of these assessments were superseded by

⁸ MHCLG does not provide affordable housing demolition data at local authority level.

the 2022 HNA. Table 5.2 calculates the current cumulative shortfall against the affordable housing needs identified in the 2022 HNA.

Table 5.2: Net Additions to Affordable Housing Stock Compared to Affordable Needs Identified in the 2020 HNA, 2021/22 to 2023/24

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	1	326	-325	-325	0%
2021/22	-16	326	-342	-667	-5%
2022/23	-4	326	-330	-997	-1%
2023/24	7	326	-319	-1,316	2%
Total	-12	1,304	-1,316		-1%
Avg. Pa	-3	326	-329		

Source: MHCLG Open Data; and 2020 HNA.

- 5.10 Table 5.2 demonstrates that in the four-year period since the start of the 2020 HNA period in 2020/21 the Council has lost more homes than it has delivered. This has resulted in a cumulative shortfall of 1,316 affordable homes against a need for 1,304. The average annual delivery of -3 affordable homes per annum starkly contrasts with the identified need of 326 affordable homes per year. In percentage terms -1% of needs were met over the period.
- 5.11 In the first year of the 2023 LHNA assessment period, the Council delivered only 7 net affordable homes, falling significantly short of the identified need for 210 net affordable dwellings. This represents a shortfall of 203 affordable homes, meeting just 3% of the identified need. In other words, 97% of households requiring affordable housing were left without suitable provision. This underscores the urgent need for accelerated efforts to address affordable housing needs in the Borough.

Addressing the Shortfall

- 5.12 In my view, the scale of the shortfall, combined with the substantial number of households on the Council's Housing Register, underscores an urgent and pressing need for affordable housing. The 648 households on the Councils Housing Register are in need of an affordable home *now*; as are the 169 children in temporary accommodation.
- 5.13 In my view, the aim should be to meet the shortfall in affordable housing provision as soon as possible i.e. over the next five years, in line with the approach set out in the NPPG⁹ for overall housing shortfalls. A summary of SoS and Inspectors appeal decisions that support this approach is provided at **Appendix AG7**.

⁹ Paragraph: 031 Reference ID: 68-031-20190722

- 5.14 To clear the 1,316 dwelling shortfall accumulated between 2020/21 and 2023/24 against the needs identified in the 2020 HNA, the Council would need to deliver 589¹⁰ net affordable dwellings per annum over the next five years (2024/25 to 2029/30), representing an 81% increase from the annual need of 326 net affordable dwellings identified in the 2020 HNA.
- 5.15 Similarly, to clear the 203 dwelling shortfall accumulated in 2023/24 against the needs identified in the 2023 LHNA, the Council would need to deliver 251¹¹ net affordable dwellings per annum over the next five years (2024/25 to 2029/30), representing an 20% increase from the annual need of 210 net affordable dwellings identified in the 2023 LHNA. Without a step change in affordable housing delivery this is unlikely to be realised.

Conclusions

- 5.16 The analysis of affordable housing delivery in Castle Point reveals a stark and persistent failure to meet identified needs, with a cumulative shortfall of more than 1,316 affordable homes in the four years of the 2020 HNA assessment period. In order to address the past shortfall and meet current needs the Council will need to deliver 525 net affordable homes per annum over the next five years. In the first year of the 2023 LHNA assessment period a shortfall of 203 affordable homes has accrued. If this shortfall is to be addressed in the next five years the Council will need to deliver 251 net affordable dwellings per annum over the next five years, a 20% increase from the annual need of 210 net affordable dwellings identified in the 2020 HNA.
- 5.17 This trend is underpinned by consistently low delivery rates, averaging just seven net affordable homes per annum since 2014/15, combined with significant losses through the Right to Buy scheme, which has eroded almost half of gross additions over the same period. Despite the Council's stated objective to deliver 100 affordable homes per year by 2025, recent data highlights a net reduction in affordable housing stock since 2021/22, directly contradicting its own targets and amplifying the crisis. The scale of this shortfall, coupled with the growing backlog of unmet need, demonstrates a systemic failure to address affordability challenges across the Borough.

¹⁰ $1,316 / 5 = 263.2 + 326 = 589.2$

¹¹ $203 / 5 = 40.6 + 210 = 250.6$

6. Market Conditions

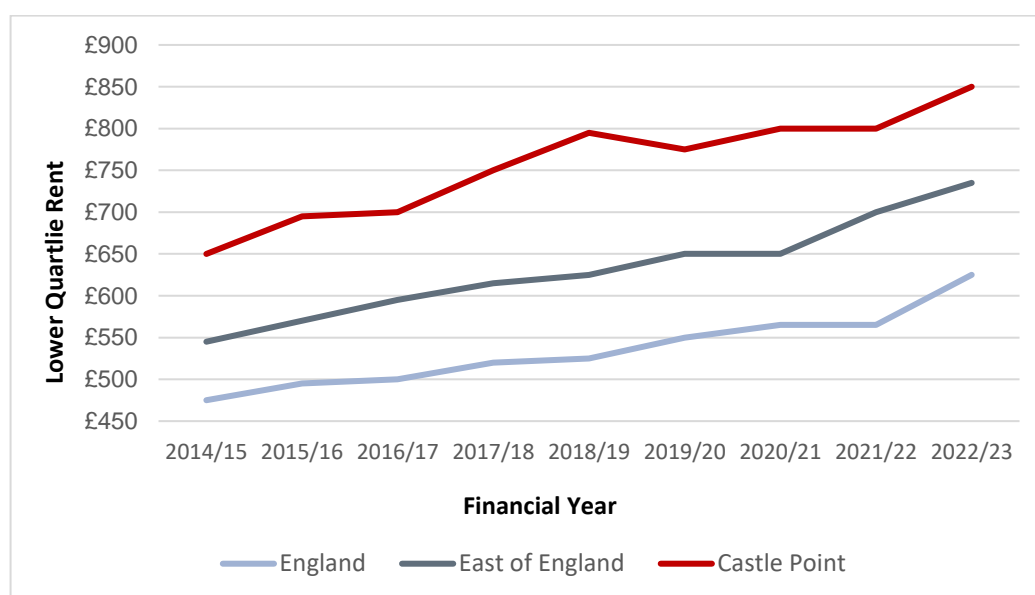
Introduction

- 6.1 The NPPF is clear that all households whose needs are not met by the market (either to rent or to buy) are considered to be in affordable housing need. This section analyses past and current market conditions in both the rental and ownership segments of the market to understand the nature of the housing market in the Borough.

Private Rental Market

- 6.2 The following analysis relies on Office for National Statistics (ONS) Private Rental Market Statistics (formerly produced by the Valuation Office Agency (VOA)). The data includes both existing and new lets, meaning it may not fully reflect costs faced by new tenants in the Borough.

Figure 6.1: Lower Quartile Private Sector Rents, 2014/15 to 2022/23

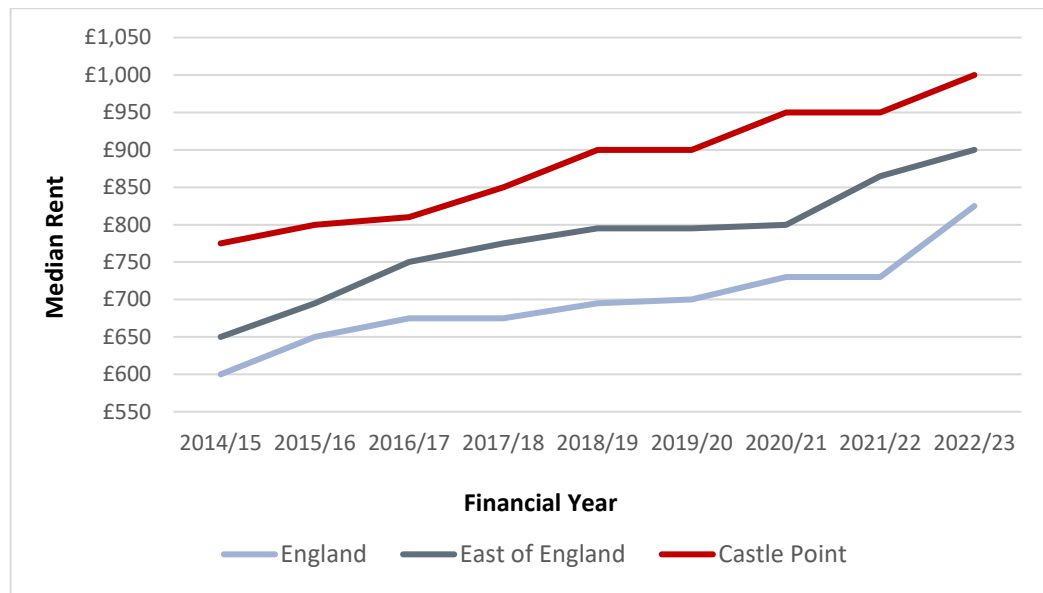


Source: VOA Open Data; and ONS Open Data.

- 6.3 Figure 6.1 above shows the following trends in the lower quartile segment of the private rental market, representing entry-level rental prices, across the Borough since the beginning of the 2017 SHMA period in 2014/15:

- LQ rents in Castle Point increased by 31% between 2014/15 and 2022/23, rising from £650 pcm to £850 pcm.
- LQ rents in Castle Point have been consistently significantly above both the national and regional figures.
- LQ rents in Castle Point were 16% higher than the regional figure (£735pcm) and 36% higher than the national figure (£625 pcm) in 2022/23.

Figure 6.2: Median Private Sector Rents, 2014/15 to 2022/23



Source: VOA Open Data; and ONS Open Data.

6.4 Figure 6.2 above shows the following trends in the median segment of the private rental market, representing the midpoint of rental prices, across the Borough since the beginning of the 2017 SHMA period in 2014/15:

- Over the period there has been a 29% increase in median rents, from £775 pcm to £1,000 pcm.
- Median rents in Castle Point have been consistently significantly above both the national and regional figures.
- Median rents in Castle Point are 11% higher than the regional figure (£900 pcm) and 21% higher than the national figure (£825 pcm) in 2022/23.

6.5 Rental prices in Castle Point, at both lower quartile and median levels, consistently surpass regional and national averages, underscoring significant affordability challenges for renters in the Borough. These elevated rents place increasing pressure on households, particularly those seeking entry-level housing, and highlight the strain on the private rental sector as a primary housing option. The severity of the affordability crisis is further evidenced by the fact that the loss of a private rented sector tenancy is the leading cause of a homelessness prevention duty being owed, reflecting the precarious nature of rental housing for many residents.

Homeownership Market

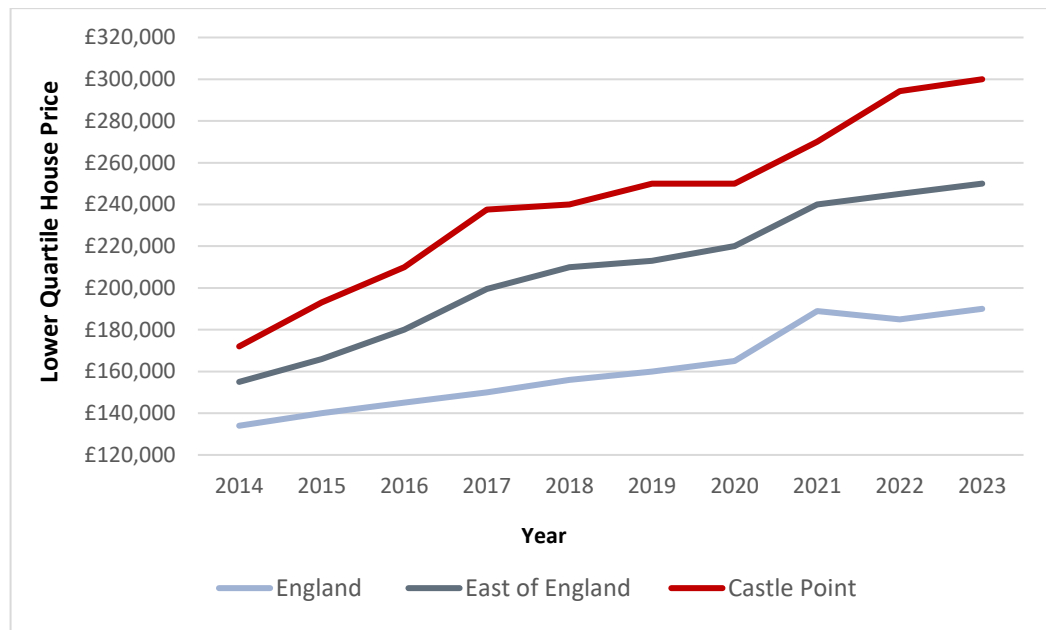
6.6 The ONS publishes annual house price and earnings data for affordability ratios at the lower quartile and median levels. The median affordability ratio is key component in the Standard Method calculation for determining Local Housing Need.

Lower Quartile House Prices

6.7 Figure 6.3 below identifies the following trends in lower quartile house prices, representing entry-level housing costs, across the Borough since the start of the 2017 SHMA period in 2014:

- LQ house prices in Castle Point rose by 74% over the period from £172,000 in 2014 to £300,000 in 2023.
- This growth exceeded regional (+61%) and national (+42%) increases.
- LQ house prices have been consistently significantly above both the national and regional figures.
- Castle Point LQ house prices are 20% higher than the regional average (£250,000) and 58% higher than the national average (£190,000).

Figure 6.3: Lower Quartile House Prices, 2014 to 2023

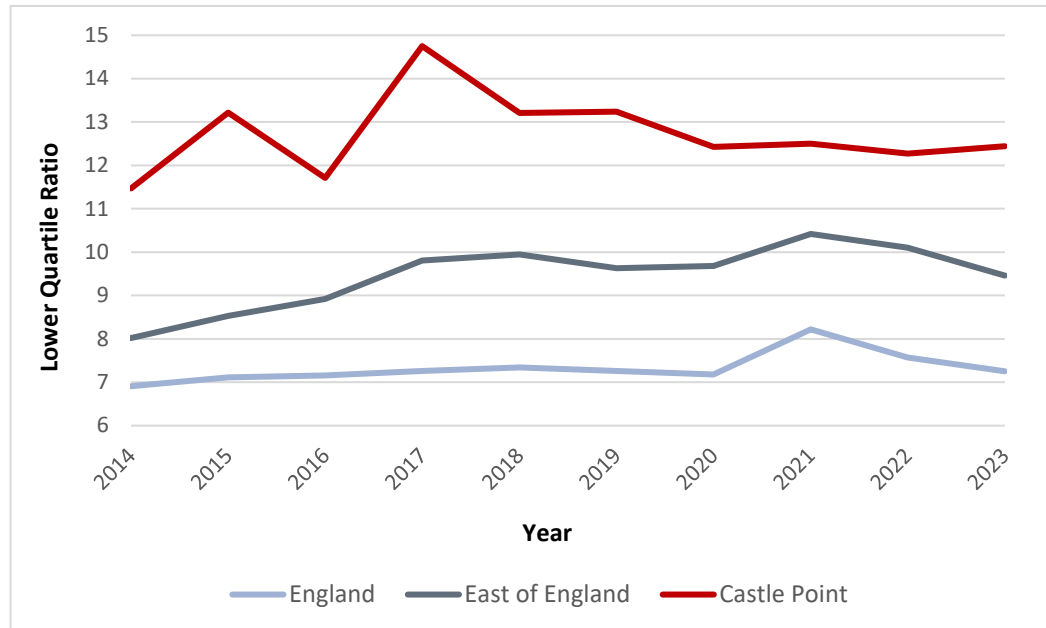


Source: ONS Open Data.

6.8 It is important to consider LQ house prices in context of LQ incomes. Figure 6.4 below compares the workplace-based lower quartile affordability ratio for Castle Point against regional and national averages from 2014 to 2023, highlighting the following trends:

- The LQ ratio in Castle Point rose by 8% over the period from 11.47 in 2014 to 12.44.
- The LQ income to house price ratio across the Borough has been consistently significantly above both the national and regional figures.
- Castle Point LQ ratio is 32% higher than the regional figure (9.46) and 72% higher than the national figure (7.25).

Figure 6.4: Lower Quartile Workplace-Based Affordability Ratio comparison, 2014 to 2023



Source: ONS Open Data.

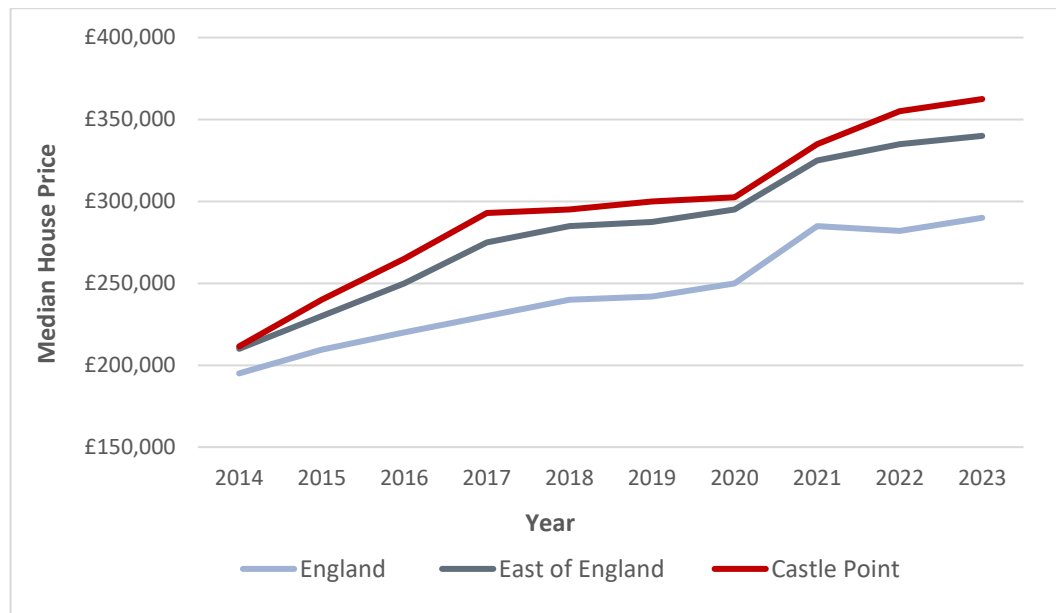
- 6.9 Castle Point has experienced significant and sustained affordability pressures in the lower quartile housing market, with house prices rising by 74% since 2014, outpacing income growth over the same period. The Borough's lower quartile affordability ratio, which has increased by 8% to 12.44, is consistently and significantly higher than both regional and national averages. These disparities highlight the severe challenges faced by lower-income households in accessing homeownership in Castle Point.

Median House Prices

- 6.10 Figure 6.5 below shows trends in median house prices, representing the midpoint of the housing market, across the Borough since the start of the 2017 SHMA period in 2014:

- Median house prices in Castle Point rose by 71% over the period from £211,500 in 2014 to £3062,500 in 2023.
- This growth exceeded regional (+62%) and national (+49%) increases.
- Median house prices have been consistently above both the national and regional figures.
- Castle Point median house prices are 7% higher than the regional average (£340,000) and 25% higher than the national average (£290,000).

Figure 6.5: Median House Prices, 2014 to 2023

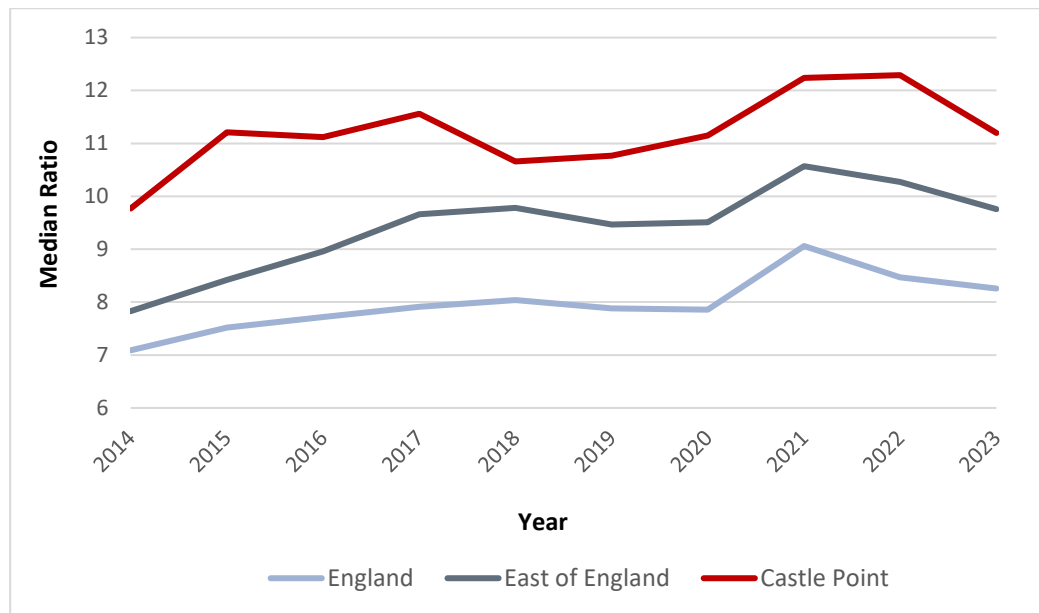


Source: ONS Open Data.

6.11 Analysing the affordability of median house prices requires placing them in the context of median incomes. Figure 6.6 below illustrates the workplace-based median affordability ratio for Castle Point compared to regional and national averages over the period 2014 to 2023, highlighting the following trends:

- The median ratio in Castle Point rose by 15% over the period from 9.77 in 2014 to 11.20.
- The median income to house price ratio across the Borough has been consistently significantly above both the national and regional figures.
- Castle Point median ratio is 15% higher than the regional figure (9.76) and 36% higher than the national figure (8.26).

Figure 6.6: Median Workplace-Based Affordability Ratio comparison, 2014 to 2023



Source: ONS Open Data.

- 6.12 Castle Point's median house prices have risen significantly, increasing by 71% since 2014, outpacing regional and national growth rates of 62% and 49%, respectively. This rapid increase has pushed median house prices consistently above regional and national averages. When placed in the context of incomes, the Borough's median affordability ratio has risen by 15% over the same period, reaching 11.20 in 2023, which is 15% higher than the regional ratio and 36% above the national ratio. While there was a slight decline in affordability pressures in 2023, the gap between house prices and incomes remains significant, underscoring persistent challenges for median-income households.

Conclusions

- 6.13 The analysis highlights significant affordability challenges in both the rental and ownership segments of Castle Point's housing market, with costs consistently exceeding regional and national averages. In the private rental market, lower quartile rents have risen by 31% and median rents by 29% since 2014/15, placing substantial pressure on households, particularly those seeking entry-level housing. This affordability crisis is reflected in homelessness data, where the loss of private rented sector tenancies is the leading cause of a homelessness prevention duty being owed.
- 6.14 Similarly, house prices have increased dramatically, with lower quartile prices rising by 74% and median prices by 71% over the same period, outpacing income growth and further marginalising lower and median income households. The Borough's affordability ratios for both lower quartile and median house prices underscore the scale of the challenge, with ratios significantly above regional and national benchmarks. Lower quartile house prices are 32% less affordable than the regional figure and 72% less affordable than the national figure, while the median affordability ratio is 15% and 36% higher than regional and national figures, respectively.

7. Future Supply of Affordable Housing

Introduction

- 7.1 This section focuses on the future supply of affordable housing in Castle Point, analysing the Councils projected delivery against identified needs. Drawing on the latest Five-Year Housing Land Supply (5YHLS) trajectory and planning permissions data, it evaluates the extent to which planned developments can address the Borough's shortfall in affordable housing provision.

Methodology

- 7.1 I have analysed the Council's latest published 5YHLS trajectory which is contained in the Authority Monitoring Report 1st April 2022 – 31st March 2024 ('the AMR') (CD7.8).
- 7.2 The Council anticipates that it has a total supply of 1,143 dwellings over the five-year period from 1 April 2024 to 31 March 2029 from the following three sources of supply:
- 573 dwellings on Strategic Site Allocations;
 - 494 dwellings on sites with extant planning permission as listed in Appendix 4 of the AMR;
 - 36 dwellings on sites listed as "SHLAA Policy Compliant and expired consents";
 - 100 dwellings on the net Brownfield register sites;
 - 180 dwellings on windfall sites; and
 - Minus 240 dwellings on losses on strategic sites (i.e. land at Thorney Bay).
- 7.3 For the purpose of this evidence, future affordable housing delivery has been calculated using sites included in the supply which are permitted for 10 dwellings and above as they are considered to qualify for affordable housing contributions.
- 7.4 For sites without planning permission, I have assumed that the Council will be seeking 35% affordable housing provision from qualifying sites as set out in the Affordable Housing SPD. However, as previously noted this is not a Development Plan policy requirement, which may frustrate the Councils ability to secure this level of provision.
- 7.5 I have not assumed any affordable housing delivery from the windfall allowance, since this is likely to comprise mostly smaller sites that will not qualify for affordable housing contributions. I have also assumed that none of the losses on strategic sites will be affordable dwellings.
- 7.6 As larger sites often deliver housing across several phases and over an extended timeframe, a 'pro-rata' estimate of affordable housing contributions for the five-year period has been applied.

Councils Position

Strategic Allocations

- 7.7 Three of the Strategic Allocation included in the Councils 5YHLS have planning permission (HO24, HO27 and HO30), none of which provide affordable housing. The remaining allocations without planning permission (HO15, HO17, HO22, HO25 and HO28) are indicated as providing 485 total dwellings toward the supply.
- 7.8 In order to provide a 'best case' scenario I have assumed that the strategic sites without planning permission will provide 35% affordable housing provision. This equates to 170¹² affordable dwellings over the five year period.

Sites with extant planning permission

- 7.9 I have reviewed each of the sites that qualify for affordable housing contributions in Appendix 4 of the AMR. The following two sites included in this source of supply secure affordable housing provision:
- Land Rear Of 248 Hart Road Thundersley Benfleet Essex SS7 3UQ (AMR page 68) – 46 affordable dwellings
 - Hobson And Sons Ltd Kenneth Road Thundersley Benfleet SS7 3AF (AMR page 68) – 4 affordable dwellings
- 7.10 This equates to 50 affordable dwellings over the five year period.

SHLAA and Brownfield Sites

- 7.11 The Council has not provided a breakdown of the sites that make up the following sources of supply:
- 36 dwellings on sites listed as "SHLAA Policy Compliant and expired consents";
 - 100 dwellings on the net Brownfield register sites;
- 7.12 I have generously assumed that these sources will comprise sites that qualify for affordable housing contributions (i.e., sites of 10 dwellings or more) and that they will provide 35% affordable housing provision. This equates to 48¹³ affordable dwellings over the five year period.
- 7.13 It is however important to recognise that brownfield sites typically do not deliver policy compliant level of affordable housing, if any.

Summary

- 7.14 The projected supply of affordable housing for the Council over the five year period totals 268¹⁴ affordable dwellings, equivalent to just 54¹⁵ dwellings per annum.

¹² 35% of 485 = 169.75 dwellings

¹³ 35% of 136 = 47.6 dwellings

¹⁴ 170 + 50 + 48 = 268 dwellings

¹⁵ 268 / 5 years = 53.6 dwellings

- 7.15 The Council's 5YHLS future supply figure derived from the analysis falls demonstrably short of the 251 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and short of the 210 net affordable housing needs per annum identified in the 2023 LHNA.

Appellant's Position

Strategic Allocations

- 7.16 The Appellants dispute the inclusion of the Strategic Allocations without planning permission (HO15, HO17, HO22, HO25 and HO28) in the supply. As such they do not make any contribution towards affordable housing provision over the five year period.

Sites with extant planning permission

- 7.17 The Appellants do not dispute the two sites included in Appendix 4 of the AMR that secure affordable housing provision. This equates to 50 affordable dwellings over the five year period.

SHLAA and Brownfield Sites

- 7.18 The Appellants dispute the inclusion of these sites in the supply. As such they do not make any contribution towards affordable housing provision over the five year period.

Summary

- 7.19 The projected supply of affordable housing for the Appellants over the five year period totals 50 affordable dwellings, equivalent to just 10 dwellings per annum. It is notable that the appeal site will provide almost seven times this figure on a single site.
- 7.20 As with the Council's position, the Appellants 5YHLS future supply figure derived from the analysis falls demonstrably short of the 251 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and short of the 210 net affordable housing needs per annum identified in the 2023 LHNA.

Summary and Conclusions

- 7.21 On either scenario, the Council is unable to meet its affordable housing needs over the next five years between 2024/25 and 2028/29:
- At best, the Council's evidence shows it can deliver 54 gross affordable dwellings per annum over the next five years.
 - At worst, the Appellant's evidence shows that the Council can deliver just 10 gross affordable dwellings per annum over the next five years.
- 7.22 There is an urgent and pressing need for more affordable housing. Given the Council's inadequate track record in delivering affordable housing and the uncertainty surrounding future delivery, the importance of providing 87 affordable homes on this site to meet the Borough-wide needs of Castle Point should be appropriately recognised. This provision should carry very substantial weight in the determination of this appeal.

8. Justification and Associated Benefits

Introduction

- 8.1 Pursuant to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, when determining planning applications (and appeals) decision makers should first have regard to the relevant Development Plan as a whole, and then to any other material considerations.
- 8.2 Affordable housing serves a dual role in the planning process. It is both a Development Plan policy requirement and a material consideration. As a material consideration, the provision of affordable housing addresses wider societal needs, including housing affordability and social inclusion, thereby carrying weight in the planning balance.
- 8.3 In evaluating planning benefits (such as the provision of affordable housing) of a proposal, it is essential to recognise that compliance with policy, whether meeting or exceeding expectations, does not reduce a benefit's weight in the planning balance. Rather, the value of each benefit must be gauged on its own merits, considering the specific policy context and broader implications of the development.
- 8.4 As underscored in the *Vistry Homes Limited and Fairfax Acquisitions Limited v Secretary of State for Levelling Up, Housing and Communities and Others* [2024] EWHC 2088 (Admin) High Court Judgement (CD9.5), the fact that a benefit aligns with policy requirements does not make it less significant; it should still contribute meaningfully to the overall planning balance. The judgment is clear at paragraph 154 that:
- “Whether a measure should be treated as a benefit, depends upon inter alia its nature and purpose, including whether it would help to meet a need which is, or is not, related to the development proposed.”*
- 8.5 With particular regard to the weighting of the benefit of providing affordable housing, paragraph 157 emphasizes that:
- “I turn to consider questions of weight. If a decision-maker were to reduce the weight which he would otherwise give to a 40% provision of affordable housing because the development will provide the level of housing required by the development plan, that would also be objectionable, certainly in the absence of any logical explanation. The decision-maker should be assessing how the developer’s contribution of affordable housing stands in relation to inter alia the justification in the development plan for the level of affordable housing required by the policy. Key considerations could include the level and nature of the need for affordable housing in the district and any shortfall in delivery.”* (emphasis added).
- 8.6 As such the judgment affirms that affordable housing delivery should not be viewed merely as a baseline expectation for compliance with planning policy but as a meaningful benefit that carries weight in decision-making. It is incumbent upon the decision-maker to evaluate the extent to which the affordable housing provision responds to specific

needs of an authority, particularly in the context of any existing deficiencies in meeting these needs and/or shortfalls in delivery when ascribing weight in the planning balance.

Councils Assessment of the Development Proposals

- 8.7 On 7 September 2022, the Council's Housing Development and Finance Manager (CD7.12) made the following comments on the affordable housing offer:

"The mix of dwellings would appear to meet the needs of the borough and it is welcome to see 40% being affordable homes, it is noted that this will be a mix of rent and home ownership and we would welcome 50% of these being rental properties.

The properties show a mix of houses flats and bungalows, with wheelchair accessibility which would be particularly welcome to the rented stock in the area with 1 and 2 bed properties being in high demand."

- 8.8 This confirms that the appeal proposals would meet identified housing needs in the Borough by delivering a significant proportion of affordable homes (40% of the total¹⁶), with a balanced mix of rental and home ownership opportunities. The proposals align with the Council's preference for 50% rental properties.
- 8.9 Additionally, the variety of dwelling types, including houses, flats, and bungalows, along with the provision of wheelchair-accessible units, further addresses specific needs in the area. The inclusion of 1 and 2 bedroom properties, which are noted to be in high demand, further supports the suitability and relevance of the appeal proposals in meeting the housing needs of the community.
- 8.10 The Committee Report dated 19 March 2024 (CD3.2) acknowledges at paragraph 1.3 that *"The submitted scheme would make a significant contribution towards meeting both market and affordable housing needs"* going on to state at paragraph 1.7 that *"Whilst a number of benefits may be identified within the scheme, detailed analysis has failed to determine, either individually or cumulatively, they constitute the very special circumstance need to outweigh the harm to the Green Belt."*
- 8.11 Pages 23 and 24 consider the provision of affordable housing at the application site making the following comments:

"The Castle Point Strategic Housing Market Assessment Addendum 2017 identifies a net annual affordable housing need of some 291 dwellings. More recent work suggests that the Council's Housing Waiting List, which currently has 591 requests for housing accommodation, is increasing by some 110 requests per year. These are requests from local people who are unable to access housing within the borough.

It may be noted that the lower quartile house price to income ratio in Castle Point is 12:1. In other words, the cheapest market housing in the borough is

¹⁶ It is important to note that the appeal proposals now offer 50% affordable housing provision on site.

some 12 times the average annual household income of Castle Point residents.

The situation for rented property is similarly difficult, with the average rent for a 2-bedroomed house being £241 a week.

The demand for affordable housing is growing. Given the opportunities available for the provision of affordable housing, the likelihood of this Authority fully meeting its affordable housing needs is remote.

In this context, it is considered that the proposed development of the site to provide 40% of dwellings as affordable housing represents a significant benefit. This attracts significant weight in favour of the proposal.” (emphasis added).

- 8.12 Whist the Committee Report provides commentary on the need for affordable housing in the Borough, it makes no attempt to analyse the delivery of affordable housing to meet these needs nor any associated shortfalls. This is concerning given that at the time writing the Council would have been aware that they had delivered no affordable homes in the 2021/22 and 2022/23 monitoring periods. In this respect I consider the Council has sought to downplay the benefits of affordable housing at the site.
- 8.13 The Councils Statement of Case (CD11.2) makes a single reference to affordable housing at paragraph 3.11 on page 8 *“Moreover, there are clear benefits in the provision of new affordable dwellings commensurate with the Council’s policy requirement”*. The Council has made no attempt to understand the need for nor the benefits of the affordable housing proposed as part of the appeal scheme in the context of the acute housing affordability challenges within the borough.
- 8.14 In contrast, this evidence demonstrates that the Appeal Proposals offer a critical opportunity to address the Boroughs acute affordable housing needs. The Councils failure to fully appreciate or articulate the significance of this benefit represents a considerable oversight, particularly in light of their documented inability to meet affordable housing needs historically and in recent years.

Appellants Assessment of the Development Proposals

- 8.15 There is currently an absence of up to date affordable housing policy in Castle Point. The adopted Development Plan and its associated evidence base is some 16 years old. Whilst not contained within policy, the Local Plan seeks 20% affordable housing provision from qualifying developments. The affordable housing contribution proposed at the appeal site is in excess of this requirement, making a 50% contribution (87 dwellings) which meets the ‘Golden Rules’ for Green Belt development as set out in the NPPF (2024).
- 8.16 The Councils Affordable Housing SPD published in March 2023 seeks to introduce a requirement for qualifying developments to provide 35% on site affordable housing provision. This requirement does not feature in the adopted Development Plan and given SPDs cannot introduce new policy it can only be considered advisory. Irrespective of this the appeal proposals exceed this advisory threshold. The policy vacuum in Castle

Point is likely to have contributed to the Boroughs poor rate of affordable housing delivery in recent years.

- 8.17 As such there is a local affordable housing policy lacuna in Castle Point. This will severely limit the Council's ability to secure affordable housing contributions secure much needed affordable housing both now and in the future. This issue is further compounded by the fact that the emerging Local Plan is not envisaged for adoption until March 2026 at the earliest. This underscores the urgency of addressing the Borough's affordable housing needs through developments like the Appeal Site.
- 8.18 Due to the age of the evidence base underpinning the adopted Development Plan it is necessary to consider more recently published assessments of affordable housing need for the Borough, particularly as the definition of affordable housing has evolved over time. Over the past eight years, the Council has commissioned five assessments, all of which highlight a consistent and substantial demand for affordable housing:
- 2016 SHMA: 298 net dwellings per annum between 2014/15 and 2018/19, falling to 236 net affordable dwellings per annum up to the end of the period in 2036/38.
 - 2017 SHMA: 353 net dwellings per annum between 2014/15 and 2018/19, falling to 291 net affordable dwellings per annum up to the end of the period in 2036/38.
 - 2020 HNA: 326 net affordable dwellings per annum between 2021/22 and 2039/40.
 - 2023 LHNA: 210 net affordable dwellings per annum between 2023/24 and 2042/43.
- 8.19 In addition to formal assessments, real-world indicators such as the Housing Register and homelessness data highlight the tangible impacts of housing shortages in the Borough. As of 31 March 2024, there were 648 households on the Housing Register, the highest second figure since 2017. The total number of households on the Register has been increasing since 2019, reflecting a growing demand for affordable housing.
- 8.20 Temporary accommodation figures reveal further strain, with 115 households housed temporary accommodation in March 2024, a 19% increase over three years, 68% of which had at least one dependent child. Half of these households had spent over a year in temporary accommodation, reflecting prolonged stays in unsuitable housing, while 95% were placed in costly private sector solutions such as leased properties and nightly paid units. Rising numbers of households with dependent children in temporary accommodation illustrate the pressing need for an increase in affordable housing stock.
- 8.21 Homelessness data further underscores the urgency of addressing the shortage of affordable housing facing the Borough. Between April 2023 and March 2024, 106 households were accepted as being owed a Prevention Duty, with 74% of cases linked to the end of private rented tenancies (assured shorthold). During the same period, 141 households were accepted as being owed Relief Duty, with the leading cause being the breakdown of informal housing arrangements, representing 40% of cases. These indicators reflect the human scale of the Borough's housing challenges and underscore the importance of addressing these needs.

- 8.22 There are significant affordability challenges in both the rental and ownership segments of Castle Point's housing market, with costs consistently exceeding regional and national averages. In the private rental market, lower quartile rents have risen by 31% and median rents by 29% since 2014/15, placing substantial pressure on households, particularly those seeking entry-level housing. This affordability crisis is reflected in homelessness data, where the loss of private rented sector tenancies is the leading cause of a homelessness prevention duty being owed.
- 8.23 Similarly, house prices have increased dramatically, with lower quartile prices rising by 74% and median prices by 71% over the same period, outpacing income growth and further marginalising lower and median income households. The Borough's affordability ratios for both lower quartile and median house prices underscore the scale of the challenge, with ratios significantly above regional and national benchmarks. Lower quartile house prices are 32% less affordable than the regional figure and 72% less affordable than the national figure, while the median affordability ratio is 15% and 36% higher than regional and national figures, respectively.
- 8.24 The analysis of affordable housing delivery in Castle Point reveals a stark and persistent failure to meet identified needs, with a cumulative shortfall of more than 1,316 affordable homes in the four three years of the 2020 HNA assessment period. In order to address the past shortfall and meet current needs the Council will need to deliver 525 net affordable homes per annum over the next five years. In the first year of the 2023 LHNA assessment period a shortfall of 203 affordable homes has accrued. If this shortfall is to be addressed in the next five years the Council will need to deliver 251 net affordable dwellings per annum over the next five years, a 20% increase from the annual need of 210 net affordable dwellings identified in the 2020 HNA.
- 8.25 This trend is underpinned by consistently low delivery rates, averaging just seven net affordable homes per annum since 2014/15, combined with significant losses through the Right to Buy scheme, which has eroded almost half of gross additions over the same period. Despite the Council's stated objective to deliver 100 affordable homes per year by 2025, recent data highlights a net reduction in affordable housing stock since 2021/22, directly contradicting its own targets and amplifying the crisis. The scale of this shortfall, coupled with the growing backlog of unmet need, demonstrates a systemic failure to address affordability challenges across the Borough.
- 8.26 The analysis of future affordable housing supply in Castle Point highlights stark differences between the Council's projected delivery figures and those calculated by the Appellants. Under the Council's position, the projected supply of affordable housing over the five year period totals 268 affordable dwellings, equivalent to just 54 dwellings per annum. It is however important to recognise that this figure is underpinned by a number of assumptions and caveats. In contrast, the Appellants analysis identifies a much lower projected supply, totalling just 50 affordable dwellings over the period, equating to a mere 10 dwellings per annum.
- 8.27 Both positions fall woefully short of the identified need. The Council's figure is less than one-quarter of the 251 net affordable dwellings per annum required to address the backlog in line with the Sedgfield approach. The Appellants figure underscores the severe lack of affordable housing supply, representing only 4% of the identified annual

need. These figures highlight the critical importance of delivering the 87 affordable homes at the Appeal Site. This level of provision exceeds the total affordable housing delivery projected by the Appellants and would make a substantial contribution toward meeting the acute affordable housing needs in Castle Point.

8.28 In this context it is important to acknowledge the consequences of failing to meet affordable housing needs in any Local Authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified¹⁷ as follows:

- A lack of financial security and stability;
- Poor impacts on physical and mental health;
- Decreased social mobility;
- Negative impacts on children's education and development;
- Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour, or those with substance abuse issues;
- Being housed outside social support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increasing national housing benefit bill.

8.29 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need now. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

8.30 The Appeal Proposals would provide 87 much needed affordable homes. Not only is this more than the Councils projected future supply, but it is also more than the Councils total net delivery of affordable homes since 2014, which amounted to just 66 homes. The affordable homes proposed would represent a significant step forward in addressing the acute affordable housing shortfall in the Borough, where delivery has consistently fallen far below identified needs. The Appeal Proposals offer a unique opportunity to make meaningful progress in tackling the persistent housing crisis and meeting the needs of households currently excluded from the housing market.

8.31 As such I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve. The acute level of affordable housing need in Castle Point, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can.

¹⁷ Sources for this evidence include a diverse range of reports from the Children's Commissioner, Shelter, the House of Commons Library, and the National Housing Federation. While the content of these reports is not reproduced word for word in this evidence for reasons of proportionality, copies can be made available as Core Documents upon request.

In my opinion, the Council have deliberately sought to downplay the provision of 87 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded very substantial weight in the determination of this appeal.

Summary

- 8.32 The analysis underscores the critical importance of the proposed 87 affordable homes as part of the appeal scheme. Affordable housing is not merely a policy requirement but a pressing societal need, especially in Castle Point, where delivery has been persistently and significantly below the identified need. The Council's failure to meet its own affordable housing targets, combined with escalating affordability challenges in both the rental and ownership markets, has resulted in a housing crisis affecting some of the Borough's most vulnerable households. The proposed development offers a rare and impactful opportunity to provide affordable homes at a scale that exceeds the Council's total net delivery since 2014, assisting in addressing the acute shortfall and meaningfully contributing to alleviating housing pressures.
- 8.33 The evidence highlights a systemic failure to deliver the levels of affordable housing necessary to meet its identified needs, exacerbating the housing crisis for local residents. The proposed development represents a significant step toward addressing this deficit, improving housing access for those most in need. The Council's lack of sufficient consideration for this benefit underscores the need for decision-makers to fully recognise the potential of the affordable housing contribution in the planning balance. In light of the Borough's acute affordability challenges, worsening income to house price ratios, and growing Housing Register, the provision of 87 affordable homes should be afforded **very substantial weight** in the determination of this appeal.

9. Summary

Introduction

- 9.1 There is extensive evidence highlighting the severity of the national housing crisis in the UK, which leaves millions of people unable to secure adequate accommodation that meets their needs. It is evident that a significant increase in housing delivery, particularly affordable housing, is crucial to addressing the housing crisis.
- 9.2 The NPPF is clear that in order to meet the social dimension of sustainable development it is imperative to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations (paragraph 8c). In this respect it is important also acknowledge the Government's objective of significantly boosting the supply of homes (paragraph 60).
- 9.3 This evidence has demonstrated that the housing crisis is particularly acute in Castle Point, where the delivery of affordable housing has persistently fallen short of identified needs. Market signals indicate a worsening trend in affordability across the Borough and, by any measure of affordability, the Council is amid an affordable housing emergency. Urgent action must be taken to deliver more affordable homes.

Affordable Housing Offer

- 9.4 The appeal proposes 173 dwellings, comprising 50% affordable housing (87 dwellings), secured through a Section 106 Agreement. The proposed tenure mix includes 50% Affordable Rented units (44 homes) and 50% Shared Ownership units (43 homes), delivering a balanced and sustainable community. This provision surpasses the expectations of paragraph 4.28 of the Local Plan (1998) and the Developer Contributions Guidance Supplementary Planning Document (2023) and meets the expectations of the NPPF (2024).

Justification and Need

- 9.5 The evidence presented in this Statement highlights the acute need for affordable housing in Castle Point. Key indicators include a cumulative shortfall of over 1,316 affordable homes during the 2020 HNA assessment period and a backlog against the 2023 LHNA that requires the delivery of 251 affordable homes annually for the next five years to address unmet needs. Market conditions further underscore this urgency, with lower quartile house prices rising by 74% since 2014 and rents increasing by 31% over the same period. These affordability pressures are reflected in the growing Housing Register, which now stands at 648 households, and the increasing reliance on temporary accommodation, housing 115 families as of March 2024, 68% of whom include dependent children.
- 9.6 This context demonstrates the essential role that developments like the appeal site play in addressing the severe affordability crisis in Castle Point. The proposed 87 affordable homes equate to more than the Council's entire net delivery of affordable housing over the last decade. Based on the Council's heavily caveated future supply position there is

likely delivery of only 54 affordable homes per year at best, which is less than the appeal proposals. In contrast, the Appellants' analysis estimates an even lower supply of just 10 affordable homes annually. The Appeal Site would deliver almost seven times this figure on a single site. This stark disparity underscores the transformative impact the Appeal Site could have in addressing the Borough's acute affordable housing crisis, making its provision a considerable benefit.

Planning Benefits

- 9.7 The proposed development directly addresses these critical housing needs by delivering a balanced mix affordable homes that supports a range of incomes. It aligns with national planning policy objectives, including those outlined in the consultation draft of the NPPF, which emphasises meeting housing needs in full and delivering a variety of affordable housing options. The weight of these planning benefits is substantial and should be recognised as a key consideration in the determination of this application.
- 9.8 In conclusion, the proposed development offers an exceptional opportunity to deliver urgently needed affordable housing in Castle Point. By addressing both current and future housing needs, it aligns with local and national policy objectives, representing a sustainable and positive contribution to the Borough's housing market. **Very substantial weight** should be given to this benefit in the planning balance.

Turley Bristol Office
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Bristol
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Appeal by Countryside Partnerships (Eastern Home Counties)

Land at Brook Farm adjoining 451-469 Daws Heath Road Hadleigh Essex

Appeal Ref: APP/M1520/W/24/3351658

LPA Ref: 22/0484/FUL

Proof of Evidence Appendices – Affordable Housing Matters

Annie Gingell (BSc (Hons) MSc MRTPI)

December 2024

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Contact

Annie Gingell

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Client

Countryside Partnerships (Eastern Home Counties)

Our reference

02168

December 2024

Appendix 1: Freedom of Information Response

Housing Register

1. The total number of households on the Housing Register on 31 March 2024: **589**
2. The total number of households with active applications pending acceptance onto the Housing Register on 31 March 2024: **217**
3. The average waiting times for households to be housed between 1 April 2023 and 31 March 2024 for the following types of affordable property:

Type of affordable property	Average Waiting Times (2023/24)
1-bed affordable property	28 months
2-bed affordable property	37 months
3-bed affordable property	51 months
4+ bed affordable property	92 months

4. The number social housing re-lets (a property that becomes available for a new tenant when a previous tenant vacates it) between 1 April 2023 and 31 March 2024: **96 dwellings.**
5. The number of properties advertised and the average number of bids per property between 1 April 2023 and 31 March 2024 in the following locations:

Type of affordable property	St Michael's Ward		Thundersley North Ward		Thundersley South Ward		Hadleigh St. James Ward	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable property	7 (NB all units within our sheltered schemes)	57	1	162	5	113		
2-bed affordable property	1 sheltered housing unit	3			2	75		
3-bed affordable property					1	85		
4+ bed affordable property								
Totals								

6. Any changes made to the Housing Register Allocations Policy since 2011, including:

- Dates each new/ amended Allocations Policy was published:
Dates each new/ amended Allocations Policy was implemented;
- Description of the changes in each new/ amended Allocations Policy; and
- Copies of each new/ amended Allocations Policy published.

Since 2011 the following amendments were made to the Allocations Policy:

- Spring 2012 - To reflect the Localism Housing Act 2011 resulting only those households with a housing need being eligible to join our register,
- April 2018 - To reflect the Homeless Reduction Act 2017,
- 2020 (see not sure of exact date) general review of policy and to increase eligibility for those applying for sheltered housing.
- July 2023 – minor amendments capital savings/assets

Click on the following line for current Allocations Policy [allocation-policy-2020pdf.pdf](#)

Temporary Accommodation

7. The number of households housed in temporary accommodation by the Council within and outside the Local Authority area on the following dates:

Temporary Accommodation Location	31 March 2023	31 March 2024
Households Housed within the Local Authority area	74	66
Households Housed outside the Local Authority area	44	65
Total Households		

8. The number of households housed in temporary accommodation within the Local Authority area by other Council's on the following dates:

Date	Total Households
31 March 2023	4
31 March 2024	19

Housing Completions

9. The number of NET¹ housing completions² and affordable housing³ completions in St Michael's Ward over the following monitoring years (1 April to 31 March):

Monitoring Year	Housing Completions (Net)	Affordable Housing Completions (Net)
2006/07		
2007/08		
2008/09		
2009/10		
2010/11		
2011/12		
2012/13		
2013/14		
2014/15		
2015/16		
2016/17	3	0
2017/18	4	0
2018/19	6	0
2019/20	46	0
2020/21	6	0
2021/22	2	0
2022/23	2	0
2023/24	0	0
Totals	69	0

¹ Net refers to total (gross) completions minus any losses to stock through demolitions.

² A housing completion refers to a newly constructed or converted dwelling that is ready for occupation.

³ As defined by Annex 2 of the National Planning Policy Framework (2023) which can be viewed [here](#).

Appendix 2: Core Documents List

CD3 Committee/Officer's Report and Decision Notice

Ref.	Document
3.2	Committee Report

CD4 The Development Plan

Ref.	Document
4.1	Adopted Local Plan Saved Policies

CD5 Supplementary planning documents / guidance

Ref.	Document
5.2	Developers Contributions Guidance SPD Affordable Housing

CD7 Planning Policy Evidence Base

Ref.	Document
7.7	South Essex Housing Needs Assessment
7.8	Castle Point Authority Monitoring Report 1st April 2022 -31st March 2024
7.11	Castle Point Corporate Plan 2021/2024
7.12	Housing Development and Finance Manager e-mail
7.13	Castle Point Homelessness and Rough Sleeping Strategy 2019-2024
7.17	Building the homes we need Ministerial Statement
7.18	Draft New NPPF
7.21	Castle Point Issues and Options Consultation Document
7.22	South Essex Strategic Housing Market Assessment
7.22	South Essex Strategic Housing Market Assessment Addendum

CD8 Relevant Appeal Decisions

Ref.	Document
8.3	APP/Q3115/W/19/3230827, Oxford Brookes University

CD9 Relevant Judgements

Ref.	Document
9.5	Vistry Homes Ltd v Secretary of State for Levelling Up, Housing and Communities & Fairfax Acquisitions Ltd v Secretary of State for Levelling Up, Housing and Communities

CD10 Signed Statement of Common Ground

Ref.	Document
10.1	Signed Statement of Case

CD11 Statements of Case

Ref.	Document
11.2	Councils Statement of Case

CD12 Inquiry documents

Ref.	Document
12.3	Appellant Proof Ben Pycroft (Housing Land Supply)
12.4	Appellant Proof Annie Gingell (Affordable Housing)
12.6	Appellant Proof Matthew Wood (Planning Policy and Planning Balance)

Appendix 3: Expression of Interest Letter

Letter contained overleaf.



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Alex Harrison
Vistry Eastern Counties, Countryside House, Brentwood

Mobile: 07711 438532
Email: nick.sills@moat.co.uk

2nd December 2024

Dear Alex,

Land at Brook Farm, Daws Heath Road, Daws Heath - 22/0484/FUL

Moat boasts a distinguished history of providing affordable housing throughout the South East, a legacy we hold in high regard. Moat are one of the local authority's recognised preferred partners, meaning we conform to recognised standards on housing management, development and governance. The Council strive to actively work with preferred partners to identify sites to be brought forward for new affordable housing.

Moat currently manage over 21,000 homes across Kent, Sussex, Essex, South East London and Surrey. As a not-for-profit organisation, we reinvest any surplus income we make into maintaining and improving our existing homes and building new ones where they are most needed. Our long development history is an important part of our DNA, and we're proud of the great homes and communities we've helped create by building attractive, safe, and sustainable homes in desirable surroundings, with many more in the pipeline.

Expanding our housing stock in Castle Point has long been a priority for Moat, especially in areas where affordable housing options are scarce. The provision of new homes not only addresses the pressing need for housing but also holds the promise of fostering thriving, inclusive communities. Affordable housing plays a pivotal role in providing stability and security for individuals and families who may otherwise struggle to find suitable accommodation. By offering affordable homes, we aim to alleviate financial burdens, reduce housing insecurity, and enhance the overall well-being of residents. Access to safe and affordable housing is fundamental to achieving positive social outcomes, such as improved health, education, and employment opportunities. Therefore, the development of new affordable housing in Castle Point represents a tangible investment in the future vitality and resilience of our communities.

The proposed development at Daws Heath Road is one that Moat is eager to be involved with. We would certainly be interested in putting forward an offer to acquire the affordable housing on the scheme should the planning appeal be successful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nick Sills'.

Nick Sills
Senior Land & New Business Manager

Appendix 4: Relevant NPPG Extracts

Section	Paragraph	Relevant Extracts
Housing and Economic Needs Assessment What is housing need?	Paragraph: 001 Reference ID: 2a-001-20241212 Revision date: 12 12 2024	<i>“Housing need is an unconstrained assessment of the minimum number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”</i>
Housing and Economic Needs Assessment Why is an affordability adjustment applied?	Paragraph: 006 Reference ID: 2a-006-20241212 Revision date: 12 12 2024	<p><i>“An affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need because:</i></p> <ul style="list-style-type: none"> <i>• housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed</i> <i>• people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.</i> <p><i>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.”</i></p>
Housing and Economic Needs Assessment What types of households are considered to be in affordable housing need?	Paragraph: 018 Reference ID: 2a-018-20190220 Revision date: 20 02 2019	<i>“All households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing for planning purposes is set out in Annex 2 of the National Planning Policy Framework.”</i>
Housing and Economic Needs Assessment	Paragraph: 019	<i>“Strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack</i>

How can affordable housing need be calculated?	Reference ID: 2a-019-20190220 Revision date: 20 02 2019	<i>their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments)."</i>
Housing and Economic Needs Assessment How can the current unmet gross need for affordable housing be calculated?	Paragraph: 020 Reference ID: 2a-020-20190220 Revision date: 20 02 2019	<p><i>"Strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:</i></p> <ul style="list-style-type: none"> <i>• the number of homeless households;</i> <i>• the number of those in priority need who are currently housed in temporary accommodation;</i> <i>• the number of households in over-crowded housing;</i> <i>• the number of concealed households;</i> <i>• the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i> <i>• the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."</i>
Housing and Economic Needs Assessment How can the number of newly arising households likely to be in affordable housing need be calculated (gross annual estimate)?	Paragraph: 021 Reference ID: 2a-021-20190220 Revision date: 20 02 2019	<i>"Projections of affordable housing need will have to reflect new household formation, the proportion of newly forming households unable to buy or rent in the market area, and an estimate of the number of existing households falling into need. This process will need to identify the minimum household income required to access lower quartile (entry level) market housing (strategic policy-making authorities can use current costs in this process, but may wish to factor in anticipated changes in house prices and wages). It can then assess what proportion of newly-forming households will be unable to access market housing."</i>
Housing and Economic Needs Assessment How can the current total affordable housing supply	Paragraph: 022 Reference ID: 2a-022-20190220 Revision date: 13 09 2018	<p><i>"Assessing the total affordable housing supply requires identifying:</i></p> <ul style="list-style-type: none"> <i>• the number of affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households in need;</i>

<p>available be calculated?</p>		<ul style="list-style-type: none"> • <i>suitable surplus stock (vacant properties); and</i> • <i>the committed supply of new net affordable homes at the point of the assessment (number and size).</i> <p><i>Sources of data: Ministry of Housing, Communities and Local Government affordable housing supply statistics to show recent trends, and local authority and Registered Social Landlord records including housing register, transfer lists, demolition and conversion programmes, development programme of affordable housing providers.</i></p> <p><i>Total affordable housing stock available = Dwellings currently occupied by households in need + surplus stock + committed additional housing stock – units to be taken out of management”</i></p>
<p>Housing and Economic Needs Assessment</p> <p>How is the total annual need for affordable housing calculated?</p>	<p>Paragraph: 024</p> <p>Reference ID: 2a-024-20190220</p> <p>Revision date: 20 02 2019</p>	<p><i>“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.</i></p> <p><i>The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”</i></p>
<p>Housing Supply and Delivery</p> <p>How can past shortfalls in housing completions against planned requirements be addressed?</p>	<p>Paragraph: 031</p> <p>Reference ID: 68-031-20190722</p> <p>Revision date: 22 July 2019</p>	<p><i>“Under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing.”</i></p> <p><i>“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied”</i></p>

Appendix 5: Historic Freedom of Information Response

Response contained overleaf.

Questions 1 to 14 of this request relate to data held by the Housing Department.
Question 15 of this request relates to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2022. **598**
2. Is any breakdown available of the housing register by:
 - a. Household composition (e.g. single person, couple, family etc?)
 - b. Number of bedrooms needed per household
 - c. Applicants who require an accessible/adaptable property

Data from January 22

Breakdown of Housing Need						
Band	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	Total
A	37	43	22	2	1	105
B	47	36	38	7	0	128
C	115	83	51	2	0	251
D	106	1	0	0	0	107
Total	305	163	111	11	1	591
Dwelling type need as a percentage of total need						
Band	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom	
A	35%	41%	21%	2%	1%	
B	37%	28%	30%	5%	0%	
Overall	52%	28%	19%	2%	0%	

In the table above the highest priority are bands A and B, Band A would be predominately households with homeless priority need, severely overcrowded or those in unsuitable accommodation. Whilst Band B are households who have lower need homeless cases, those with medical needs and lower level overcrowding. The applications in band A are reviewed every 6 months, all other bands annually.

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

d. 1-bed affordable dwelling;	12-18 months
e. 2-bed affordable dwelling;	18-24 months
f. 3-bed affordable dwelling; and	30 - 36 months
g. A 4+ bed affordable dwelling.	

4. The average waiting times at 31 March 2021 for the following types of affordable property across the Authority:

Consistent with 22

- a. 1-bed affordable dwelling;
 - b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.
5. The total number of households on the Council's Housing Register at 31 March 2022 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2022)
Canvey Island West ward	
Cedar Hall ward	
St Marys ward	

No data as Choice Based Letting system

6. The average number of bids per property over the 2021/22 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Average Bids Per Property (1 April 2021 to 31 March 2022)		
	Canvey Island West ward	Cedar Hall ward	St Marys ward
1-bed affordable dwelling			
2-bed affordable dwelling			
3-bed affordable dwelling			
4+ bed affordable dwelling			

7. We see that according to DLUHC data, the housing register fell sharply between 2015 and 2016 (1,686 households on 31 March 2015, to 1,034 on the same date in 2016) and then again between 2016 and 2017 (to 574 on 31 March 2017. Can officers advise on the reasons for this – for instance, was it related to changes to the allocations criteria, or through removal of dormant applications? **Both these**

Social Housing Stock

8. The total number of social housing dwelling stock at 31 March 2022 in the following locations:

Location	Total Social Housing Stock (31 March 2022)
Canvey Island West ward	46
Cedar Hall ward	134
St Marys ward	87

All Stock

Bedsit	1 bed	2bed	3 bed	4 bed	
203	505	357	414	11	1490

Social Housing Lettings

9. The number of social housing lettings in the period between 1 April 2020 and 31 March 2021; and between 1 April 2021 and 31 March 2022 in the following locations:

Location	Social Housing Lettings	
	1 April 2020 to 31 March 2021	1 April 2021 to 31 March 2022
Canvey Island West ward	2	5
Cedar Hall ward	10	7
St Marys ward	6	2

Temporary Accommodation

10. The number of households on the Housing Register housed in temporary accommodation within and outside the Castle Point area on the following dates:
99-125 about 50% on HR Majority in Borough

Households in Temporary Accommodation	31 March 21	31 March 22
Households Housed within Castle Point		
Households Housed outside Castle Point		
Total Households		

11. Does the Council use caravans as temporary or permanent accommodation, and if so, how many households are currently accommodated by the Council in caravans? No
12. Does the Council use other forms of temporary accommodation such as hotels, bed and breakfast and purpose-built accommodation, and if so, how many households are currently accommodated in each type? Council HMO 17 rooms, Private Sector Leased 60, rest B&B or Daily lets

13. Can the Council advise on the profile of households accommodated in each type of temporary accommodation (e.g. single person, couple, family etc?) **PSL Families, B&B & HMO Single people, Daily lets mixed**

Homelessness

14. The number of homelessness applications in the last 12 months (please specify 12 month period used) which the Council has assessed as having: TBC
- a. a prevention duty; and
 - b. a relief duty.

Housing Completions

15. The number of NET housing completions in the Castle Point Borough Council area and selected localities, broken down on a per annum basis for the period between 2014/15 and 2021/22.

	Castle Point Borough		Canvey Island		Benfleet		Thundersley	
	Total net completions	Affordable net completions	Total net completions	Affordable net completions	Total net completions	Affordable net completions	Total net completions	Affordable net completions
2014/15								
2015/16								
2016/17								
2017/18								
2018/19								
2019/20								
2020/21								
2021/22								

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: a) Affordable housing for rent b) Starter Homes c) Discounted market sales housing; and d) Other affordable routes to home ownership. ¹
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

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

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

Appendix 6: Data Tables

Table 1: Gross Additions to Affordable Housing Stock, 2014/15 to 2023/24

Monitoring Period	Total Housing Completions (net)	Gross Additions	Gross additions as a %age of total completions
2014/15	177	51	29%
2015/16	88	0	0%
2016/17	84	16	19%
2017/18	133	45	34%
2018/19	173	0	0%
2019/20	44	1	2%
2020/21	141	6	4%
2021/22	205	0	0%
2022/23	156	0	0%
2023/24	-58	9	-16%
Totals	1,142	128	11%
Avg. Pa.	114	13	11%

Source: MHCLG Open Data

Table 2: Net Additions to Affordable Housing Stock, 2014/15 to 2023/24 (detailed)

Monitoring Year	Total Housing Completions (net)	Gross Additions	LPA Right to Buy Sales	RP Right to Buy Sales	Net Additions	Net additions as a %age of total completions
2014/15	177	51	10	1	40	23%
2015/16	88	0	3	0	-3	-3%
2016/17	84	16	7	0	9	11%
2017/18	133	45	4	0	41	31%
2018/19	173	0	5	0	-5	-3%
2019/20	44	1	4	1	-4	-9%
2020/21	141	6	4	1	1	1%
2021/22	205	0	16	0	-16	-8%
2022/23	156	0	4	0	-4	-3%
2023/24	-58	9	2	0	7	-12%
Total	1,142	128	59	3	66	6%
Avg. Pa.	114	13	6	0	7	6%

Source: MHCLG Open Data

Table 3: Net Additions to Affordable Housing Stock, 2014/15 to 2023/24 (summary)

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2014/15	51	11	40
2015/16	0	3	-3
2016/17	16	7	9
2017/18	45	4	41
2018/19	0	5	-5
2019/20	1	5	-4
2020/21	6	5	1
2021/22	0	16	-16
2022/23	0	4	-4
2023/24	9	2	7
Totals	128	62	66
Avg. Pa.	13	6	7

Source: MHCLG Open Data

Table 4: Net Additions Compared to Needs Identified in the 2016 SHMA, 2014/15 to 2023/24

Monitoring Period	Net Additions	2016 SHMA	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2014/15	40	298	-258	-258	13%
2015/16	-3	298	-301	-559	-1%
2016/17	9	298	-289	-848	3%
2017/18	41	298	-257	-1,105	14%
2018/19	-5	298	-303	-1,408	-2%
2019/20	-4	236	-240	-1,648	-2%
2020/21	1	236	-235	-1,883	0%
2021/22	-16	236	-252	-2,135	-7%
2022/23	-4	236	-240	-2,375	-2%
2023/24	7	236	-229	-2,604	3%
Total	66	2,670	-2,604		2%
Avg. Pa	7	267	-260		

Source: MHCLG Open Data; and 2016 SHMA

Table 5: Net Additions Compared to Needs Identified in the 2017 SHMA, 2014/15 to 2023/24

Monitoring Period	Net Additions	2017 SHMA	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2014/15	40	353	-313	-313	11%
2015/16	-3	353	-356	-669	-1%
2016/17	9	353	-344	-1,013	3%
2017/18	41	353	-312	-1,325	12%
2018/19	-5	353	-358	-1,683	-1%
2019/20	-4	236	-240	-1,923	-2%
2020/21	1	236	-235	-2,158	0%
2021/22	-16	236	-252	-2,410	-7%
2022/23	-4	236	-240	-2,650	-2%
2023/24	7	236	-229	-2,879	3%
Total	66	2,945	-2,879		2%
Avg. Pa	7	295	-288		

Source: MHCLG Open Data; and 2017 SHMA

Table 6: Net Additions Compared to Needs Identified in the 2020 HNA, 2021/22 to 2023/24

Monitoring Period	Net Additions	2020 HNA	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	1	326	-325	-325	0%
2021/22	-16	326	-342	-667	-5%
2022/23	-4	326	-330	-997	-1%
2023/24	7	326	-319	-1,316	2%
Total	-12	1,304	-1,316		-1%
Avg. Pa	-3	326	-329		

Source: MHCLG Open Data; and 2020 HNA

Table 7: Net Additions Compared to Needs Identified in the 2023 LHNA, 2023/24

Monitoring Period	Net Additions	2023 LHNA	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2023/24	7	210	-203	-203	3%

Source: MHCLG Open Data; and 2020 HNA

Appendix 7: Relevant Decisions Summary

Summary table contained overleaf.

Appeal Ref.	Site Name	Decision Type	Decision	Decision Date	Affordable Housing Offer	Paragraph Ref.(s) / Text	Weight to Affordable Housing
A. APP/K3415/W/24/3340089 B. APP/Z3445/W/24/3340094	A. Land North of Browns Lane, Tamworth, Staffordshire B79 8UT B. Land North of Browns Lane, Tamworth, Staffordshire B79 8UT	Inspector	A. Allowed B. Allowed	04/10/2024	A. 210 homes (100% provision) B. 210 homes (100% provision)	<p>IR 69. It is common ground that The Housing and Economic Development Need Assessment – Update (HEDNA) identifies a net need for 220 new affordable rented homes per annum in LDC between 2016 and 2036, and a net need for 170 new affordable rented homes per annum in TBC between 2016 and 2036. Those assessed needs are across the whole of each administrative area.</p> <p>IR 70. Since the HEDNA, new affordable homes in LDC net of Right to Buy (RtB) have averaged 144 per year. This pace of delivery has resulted in a shortfall of -535 affordable homes since 2016/17 which is around -76 affordable homes per year below the identified need. In respect of TBC, new affordable homes net of RtB have averaged 25 per year. This has created a shortfall against the identified need of -1,017 affordable homes with an annual shortfall of -145 homes.</p> <p>IR 71. The parties agree that the shortfalls should be dealt with within the next five years. To do so in LDC, the Council need to deliver 327 net affordable homes each year between 2023/24 and 2027/28 (220 +(535/5)). Thereafter the need would reduce and revert to that identified by the HEDNA.</p> <p>IR 72. To address TBC's shortfall 373 net affordable homes are needed each year between 2023/24 and 2027/28 (170 + (1,017/5)). For the remaining period up to 2036, the annual need would be 170 affordable homes.</p> <p>IR 91. Collectively, for the above reasons, I give the proposed affordable housing provision on the appeal site very substantial positive weight. In reaching this view, I have taken the Council's case at its highest, i.e. the gross affordable housing supply for LDC and TBC.</p>	Very Substantial weight
B. APP/B1930/W/22/3312277	B. Land North Of Chiswell Green Lane, Chiswell Green, St. Albans	SoS	B. Allowed	22/03/2024	B. 330 homes (100% provision)	<p>SoS 29. For the reasons given in IR586-591, the Secretary of State agrees with the Inspector that in the context of such a great housing need, very substantial weight should be attached to the proposed housing.</p> <p>IR 193. Over the nine-year period between 2013/14 and 2021/22, there was a shortfall against that need of 5,053 affordable dwellings, equivalent to 561 per annum.</p> <p>IR 194. In the first two years of the 2020 LHNA period since 2020/21, there has been an additional shortfall of 1,428 affordable dwellings, equivalent to 714 per annum.</p> <p>IR 195. The agreed approach is that any shortfall in delivery should be dealt with in the next five years.</p> <p>IR 196. When the 1,428 dwelling affordable housing shortfall which has accumulated since 2020/21 is factored into the need of 828 affordable dwellings per annum for the period 2020 to 2036, the number of affordable homes that the Council needs to deliver in the 5-year period from 2022/23 to 2026/27 is 5,570, or 1,114 per annum.</p> <p>IR 197. The Council's current supply figure for the next five years is, however, just 39 affordable dwellings per annum.</p> <p>IR 198. That means there will be a shortfall of 1,075 affordable dwellings per annum, and a total shortfall of 5,375 affordable dwellings over the next five years.</p> <p>IR 199. These conclusions are absolutely irrefutable. In St Albans, the delivery of affordable housing has collapsed. Worse still, in refusing permission for the Appeal application, 330 affordable homes in one quick hit, the Council has given up on even attempting to address this affordable housing emergency.</p> <p>IR 591. In these respects, the scheme is unusual, but is facilitated by the appellant's desire to meet these particular needs by offering the land for free and discounting all properties by at least 33%, in excess of that required to qualify as affordable housing. Such a scheme is unquestionably a positive aspiration that would</p>	Very Substantial weight

go a long way towards boosting the Council's supply of affordable housing. In the context of such a great housing need, I attach very substantial weight to the proposed housing.

APP/C3620/W/ 23/3324631	Land at Sondes Place Farm, Westcott Road, Dorking RH4 3EF	Inspector	Allowed	28/11/2023	72 homes (50% provision)	<p>IR 85. Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need [26] points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.</p> <p>IR 86. To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to be substantially below that level of delivery. This will mean the existing shortfall will only become worse.</p> <p>IR 89. The proposal would deliver up to 72 affordable homes with a suitable tenure split, which exceeds the 40% on site provision that Core Strategy Policy CS 4 requires. The s106 agreement secures the provision and tenure split. The affordable homes would make a sizeable contribution to addressing the acute and long-established shortfall which will not be fully addressed in the short term. I give the affordable housing provision very substantial positive weight.</p>	Very Substantial weight
APP/B3410/W/ 20/3245077	Land off Aviation Lane, Burton-upon-Trent	Inspector	Allowed	07/10/2022	128 homes (100% provision)	<p>IR 8. The appellant suggests that the Council should recoup the existing shortfall over the next five years, in line with the approach set out in the Planning Practice Guidance (PPG) for overall housing shortfalls. [1] That would result in the need to secure delivery of some 164 dwellings per year over the next five years. The Council, on the other hand, considers that the total amount of required affordable housing, constituting some 1,484 dwellings, would be provided over the whole plan period (2012-2031). In my view, the extent of the shortfall and the number of households on the Council's Housing Register combine to demonstrate a significant pressing need for affordable housing now. As such, I consider that, the aim should be to meet the shortfall as soon as possible.</p> <p>IR 52. Planning law requires that applications be determined in accordance with the development plan, unless material considerations indicate otherwise. In this case I have found that the delivery of the site for 100% affordable housing would be a very significant benefit. Indeed, the SOCG sets out agreement that the weight to be afforded to the provision of affordable housing is at least significant. On a straightforward development plan balance, I am firmly of the view that the provision of the affordable housing proposed is a significant material consideration which, in this instance, outweighs the development plan conflict.</p>	Very Significant benefit
A. APP/B1930/W/ 20/3265925 B. APP/C1950/W/ 20/3265926	A. Roundhouse Farm, Land Off Bullens Green Lane, Colney Heath B. Roundhouse Farm, Land Off Bullens Green Lane, Colney Heath	Inspector	A. Allowed B. Allowed	14/05/2021	45 homes – split 50:50 between SADC and WHBC (45% provision)	<p>IR 53. The uncontested evidence presented by the appellant on affordable housing for both local authorities illustrates some serious shortcomings in terms of past delivery trends. In relation to WHBC, the affordable housing delivery which has taken place since 2015/16 is equivalent to a rate of 23 homes per annum. The appellant calculates that the shortfall stands in the region of 4000 net affordable homes since the 2017 SHMA Update, a 97% shortfall in affordable housing delivery. If the shortfall is to be addressed within the next 5 years, it would require the delivery of 1397 affordable homes per annum. In SADC, the position is equally as serious. Since the period 2012/13, a total of 244 net affordable homes have been delivered at an average of 35 net dwellings per annum. Again, this equates to a shortfall also in the region of 4000 dwellings (94%) which, if to be addressed in the next 5 years, would require the delivery of 1185 affordable dwellings per annum.</p> <p>IR 54. The persistent under delivery of affordable housing in both local authority areas presents a critical situation. Taking into account the extremely acute affordable housing position in both SADC and WHBC, I attach very substantial weight to the delivery of up to 45 affordable homes in this location in favour of the proposals.</p>	Very Substantial weight

APP/Q3115/W/ 19/3230827	Oxford Brookes University, Wheatley Campus, College Close, Wheatley, Oxford OX33 1HX	SoS	Allowed	23/04/2020	173 homes (35% provision)	<p>SoS 35. While he has concluded that the council are able to demonstrate a 5 year supply of housing land, the Secretary of State agrees that, for the reasons given in IR13.97 to 13.102, the proposed development would contribute significantly towards the Council's affordable housing shortfall. Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, that the delivery of up to 500 houses, 173 of which would be affordable, are considerations that carry very substantial weight.</p> <p>IR 13.98 For South Oxfordshire, the SHMA identifies a need for 331 net affordable homes per annum to deal with the backlog using the Sedgefield approach for the period between 2013 and 2031. [8.87] In the 6-year period since this annual need figure was calculated in the SHMA, a shortfall of -713 affordable homes has accrued as a result of delivery falling substantially short of meeting identified needs. In order to address this backlog, the Council would need to deliver 2,370 net affordable homes over the course of the next 5 years.</p> <p>IR 13.111 The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight irrespective of the fact that the Council can demonstrate a 3/5YHLS.</p>	Very Substantial weight
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Turley Bristol Office
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Appeal by Countryside Partnerships (Eastern Home Counties)

Land at Brook Farm adjoining 451-469 Daws Heath Road Hadleigh Essex

Appeal Ref: APP/M1520/W/24/3351658

LPA Ref: 22/0484/FUL

Summary Proof of Evidence – Affordable Housing Matters

Annie Gingell (BSc (Hons) MSc MRTPI)

December 2024

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Contact
Annie Gingell
annie.gingell@turley.co.uk

Client
Countryside Partnerships (Eastern Home Counties)

Our reference
02168

December 2024

1. Introduction

- 1.1 My name is Annie Gingell, and I am an Associate Director at Turley. I am instructed to present affordable housing evidence at this Inquiry by Countryside Partnerships (Eastern Home Counties), herein referred to as 'the Appellant.'
- 1.2 This Appeal follows Castle Point Borough Council's ('the Council') refusal of a full planning application for 173 dwellings on Land at Brook Farm Daws Heath Road Hadleigh Essex.
- 1.3 My evidence specifically addresses affordable housing provision and the weight that should be given to this benefit in the planning balance, taking into account evidence of local needs and delivery as well as a range of other affordable housing need and affordability indicators.
- 1.4 As part of my evidence, I have obtained and relied upon data from the Council through a Freedom of Information (FOI) request, available at **Appendix AG1** of my main Proof of Evidence.
- 1.5 The evidence which I have prepared and provide for this Appeal (PINS Reference No. APP/M1520/W/24/3351658) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

Qualifications

- 1.6 I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development also from Cardiff University (2020).
- 1.7 I am a chartered member of the Royal Town Planning Institute (RTPI) with over 10 years professional experience in the field of town planning and housing.
- 1.8 I joined Turley in October 2024 as an Associate Director. Before my role at Turley, I was an Associate Director and Head of Affordable Housing at Tetlow King Planning, having joined the company in 2017 as a Graduate Planner. Prior to this I worked as a Planning Policy Officer in Local Government at Bristol City Council.
- 1.9 During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East of England, and London. I have also acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country.

2. Justification and Associated Benefits

Introduction

- 2.1 Pursuant to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, when determining planning applications (and appeals) decision makers should first have regard to the relevant Development Plan as a whole, and then to any other material considerations.
- 2.2 Affordable housing serves a dual role in the planning process. It is both a Development Plan policy requirement and a material consideration. As a material consideration, the provision of affordable housing addresses wider societal needs, including housing affordability and social inclusion, thereby carrying weight in the planning balance.
- 2.3 In evaluating planning benefits (such as the provision of affordable housing) of a proposal, it is essential to recognise that compliance with policy, whether meeting or exceeding expectations, does not reduce a benefit's weight in the planning balance. Rather, the value of each benefit must be gauged on its own merits, considering the specific policy context and broader implications of the development.

Affordable Housing Offer

- 2.4 The proposed development is for 173 dwellings, of which 50% (87 dwellings) are to be provided on-site as affordable housing.
- 2.5 This level of provision exceeds expectations of paragraph 4.28¹ of the Local Plan (1998) and the Developer Contributions Guidance Supplementary Planning Document (2023) which seeks 35%² provision from qualifying developments.
- 2.6 This level of provision meets the 'Golden Rules' for Green Belt development as set out in the National Planning Policy Framework (NPPF) published in December 2024 which requires 50% of the housing to be affordable on such sites.
- 2.7 The affordable housing units on site will comprise the following tenures:
- 50% Affordable Rented (44 homes); and
 - 50% Shared Ownership (43 homes).
- 2.8 The tenure split aligns with the recommendations provided by the Housing Development and Finance Manager in their comments dated 7 September 2024 (CD7.12).
- 2.9 The affordable housing provision will be secured through a Section 106 Planning Obligation.

¹ Advises that the Council will seek up to 20% provision of affordable housing on sites of over 40 dwellings. This is supporting text, not policy.

² This is supplementary guidance, not adopted policy.

Appellants Assessment of the Development Proposals

- 2.10 There is currently an absence of up to date affordable housing policy in Castle Point. The adopted Development Plan and its associated evidence base is some 16 years old. Whilst not contained within policy, the Local Plan seeks 20% affordable housing provision from qualifying developments. The affordable housing contribution proposed at the appeal site is in excess of this requirement, making a 50% contribution (87 dwellings) which meets the 'Golden Rules' for Green Belt development as set out in the NPPF (2024).
- 2.11 The Councils Affordable Housing SPD published in March 2023 seeks to introduce a requirement for qualifying developments to provide 35% on site affordable housing provision. This requirement does not feature in the adopted Development Plan and given SPDs cannot introduce new policy it can only be considered advisory. Irrespective of this the appeal proposals exceed this advisory threshold. The policy vacuum in Castle Point is likely to have contributed to the Boroughs poor rate of affordable housing delivery in recent years.
- 2.12 As such there is a local affordable housing policy lacuna in Castle Point. This will severely limit the Council's ability to secure affordable housing contributions secure much needed affordable housing both now and in the future. This issue is further compounded by the fact that the emerging Local Plan is not envisaged for adoption until March 2026 at the earliest. This underscores the urgency of addressing the Borough's affordable housing needs through developments like the Appeal Site.
- 2.13 Due to the age of the evidence base underpinning the adopted Development Plan it is necessary to consider more recently published assessments of affordable housing need for the Borough, particularly as the definition of affordable housing has evolved over time. Over the past eight years, the Council has commissioned five assessments, all of which highlight a consistent and substantial demand for affordable housing:
- 2016 SHMA: 298 net dwellings per annum between 2014/15 and 2018/19, falling to 236 net affordable dwellings per annum up to the end of the period in 2036/38.
 - 2017 SHMA: 353 net dwellings per annum between 2014/15 and 2018/19, falling to 291 net affordable dwellings per annum up to the end of the period in 2036/38.
 - 2020 HNA: 326 net affordable dwellings per annum between 2021/22 and 2039/40.
 - 2023 LHNA: 210 net affordable dwellings per annum between 2023/24 and 2042/43.
- 2.14 In addition to formal assessments, real-world indicators such as the Housing Register and homelessness data highlight the tangible impacts of housing shortages in the Borough. As of 31 March 2024, there were 648 households on the Housing Register, the highest second figure since 2017. The total number of households on the Register has been increasing since 2019, reflecting a growing demand for affordable housing.
- 2.15 Temporary accommodation figures reveal further strain, with 115 households housed temporary accommodation in March 2024, a 19% increase over three years, 68% of

which had at least one dependent child. Half of these households had spent over a year in temporary accommodation, reflecting prolonged stays in unsuitable housing, while 95% were placed in costly private sector solutions such as leased properties and nightly paid units. Rising numbers of households with dependent children in temporary accommodation illustrate the pressing need for an increase in affordable housing stock.

- 2.16 Homelessness data further underscores the urgency of addressing the shortage of affordable housing facing the Borough. Between April 2023 and March 2024, 106 households were accepted as being owed a Prevention Duty, with 74% of cases linked to the end of private rented tenancies (assured shorthold). During the same period, 141 households were accepted as being owed Relief Duty, with the leading cause being the breakdown of informal housing arrangements, representing 40% of cases. These indicators reflect the human scale of the Borough's housing challenges and underscore the importance of addressing these needs.
- 2.17 There are significant affordability challenges in both the rental and ownership segments of Castle Point's housing market, with costs consistently exceeding regional and national averages. In the private rental market, lower quartile rents have risen by 31% and median rents by 29% since 2014/15, placing substantial pressure on households, particularly those seeking entry-level housing. This affordability crisis is reflected in homelessness data, where the loss of private rented sector tenancies is the leading cause of a homelessness prevention duty being owed.
- 2.18 Similarly, house prices have increased dramatically, with lower quartile prices rising by 74% and median prices by 71% over the same period, outpacing income growth and further marginalising lower and median income households. The Borough's affordability ratios for both lower quartile and median house prices underscore the scale of the challenge, with ratios significantly above regional and national benchmarks. Lower quartile house prices are 32% less affordable than the regional figure and 72% less affordable than the national figure, while the median affordability ratio is 15% and 36% higher than regional and national figures, respectively.
- 2.19 The analysis of affordable housing delivery in Castle Point reveals a stark and persistent failure to meet identified needs, with a cumulative shortfall of more than 1,316 affordable homes in the four three years of the 2020 HNA assessment period. In order to address the past shortfall and meet current needs the Council will need to deliver 525 net affordable homes per annum over the next five years. In the first year of the 2023 LHNA assessment period a shortfall of 203 affordable homes has accrued. If this shortfall is to be addressed in the next five years the Council will need to deliver 251 net affordable dwellings per annum over the next five years, a 20% increase from the annual need of 210 net affordable dwellings identified in the 2020 HNA.
- 2.20 This trend is underpinned by consistently low delivery rates, averaging just seven net affordable homes per annum since 2014/15, combined with significant losses through the Right to Buy scheme, which has eroded almost half of gross additions over the same period. Despite the Council's stated objective to deliver 100 affordable homes per year by 2025, recent data highlights a net reduction in affordable housing stock since 2021/22, directly contradicting its own targets and amplifying the crisis. The scale of this

shortfall, coupled with the growing backlog of unmet need, demonstrates a systemic failure to address affordability challenges across the Borough.

- 2.21 The analysis of future affordable housing supply in Castle Point highlights stark differences between the Councils projected delivery figures and those calculated by the Appellants. Under the Councils position, the projected supply of affordable housing over the five year period totals 268 affordable dwellings, equivalent to just 54 dwellings per annum. It is however important to recognise that this figure is underpinned by a number of assumptions and caveats. In contrast, the Appellants analysis identifies a much lower projected supply, totalling just 50 affordable dwellings over the period, equating to a mere 10 dwellings per annum.
- 2.22 Both positions fall woefully short of the identified need. The Council's figure is less than one-quarter of the 251 net affordable dwellings per annum required to address the backlog in line with the Sedgefield approach. The Appellants figure underscores the severe lack of affordable housing supply, representing only 4% of the identified annual need. These figures highlight the critical importance of delivering the 87 affordable homes at the Appeal Site. This level of provision exceeds the total affordable housing delivery projected by the Appellants and would make a substantial contribution toward meeting the acute affordable housing needs in Castle Point.
- 2.23 In this context it is important to acknowledge the consequences of failing to meet affordable housing needs in any Local Authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified³ as follows:
- A lack of financial security and stability;
 - Poor impacts on physical and mental health;
 - Decreased social mobility;
 - Negative impacts on children's education and development;
 - Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour, or those with substance abuse issues;
 - Being housed outside social support networks;
 - Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
 - An increasing national housing benefit bill.
- 2.24 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need

³ Sources for this evidence include a diverse range of reports from the Children's Commissioner, Shelter, the House of Commons Library, and the National Housing Federation. While the content of these reports is not reproduced word for word in this evidence for reasons of proportionality, copies can be made available as Core Documents upon request.

now. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

- 2.25 The Appeal Proposals would provide 87 much needed affordable homes. Not only is this more than the Councils projected future supply, but it is also more than the Councils total net delivery of affordable homes since 2014, which amounted to just 66 homes. The affordable homes proposed would represent a significant step forward in addressing the acute affordable housing shortfall in the Borough, where delivery has consistently fallen far below identified needs. The Appeal Proposals offer a unique opportunity to make meaningful progress in tackling the persistent housing crisis and meeting the needs of households currently excluded from the housing market.
- 2.26 As such I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve. The acute level of affordable housing need in Castle Point, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. In my opinion, the Council have deliberately sought to downplay the provision of 87 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded very substantial weight in the determination of this appeal.

Summary

- 2.27 The analysis underscores the critical importance of the proposed 87 affordable homes as part of the appeal scheme. Affordable housing is not merely a policy requirement but a pressing societal need, especially in Castle Point, where delivery has been persistently and significantly below the identified need. The Council's failure to meet its own affordable housing targets, combined with escalating affordability challenges in both the rental and ownership markets, has resulted in a housing crisis affecting some of the Borough's most vulnerable households. The proposed development offers a rare and impactful opportunity to provide affordable homes at a scale that exceeds the Council's total net delivery since 2014, assisting in addressing the acute shortfall and meaningfully contributing to alleviating housing pressures.
- 2.28 The evidence highlights a systemic failure to deliver the levels of affordable housing necessary to meet its identified needs, exacerbating the housing crisis for local residents. The proposed development represents a significant step toward addressing this deficit, improving housing access for those most in need. The Council's lack of sufficient consideration for this benefit underscores the need for decision-makers to fully recognise the potential of the affordable housing contribution in the planning balance. In light of the Borough's acute affordability challenges, worsening income to house price ratios, and growing Housing Register, the provision of 87 affordable homes should be afforded **very substantial weight** in the determination of this appeal.

3. Summary

Introduction

- 3.1 There is extensive evidence highlighting the severity of the national housing crisis in the UK, which leaves millions of people unable to secure adequate accommodation that meets their needs. It is evident that a significant increase in housing delivery, particularly affordable housing, is crucial to addressing the housing crisis.
- 3.2 The NPPF is clear that in order to meet the social dimension of sustainable development it is imperative to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations (paragraph 8c). In this respect it is important also acknowledge the Government's objective of significantly boosting the supply of homes (paragraph 60).

Affordable Housing Offer

- 3.3 The appeal proposes 173 dwellings, comprising 50% affordable housing (87 dwellings), secured through a Section 106 Agreement. The proposed tenure mix includes 50% Affordable Rented units (44 homes) and 50% Shared Ownership units (43 homes), delivering a balanced and sustainable community. This provision surpasses the expectations of paragraph 4.28 of the Local Plan (1998) and the Developer Contributions Guidance Supplementary Planning Document (2023) and meets the expectations of the NPPF (2024).

Justification and Planning Benefits

- 3.4 The proposed development directly addresses these critical housing needs by delivering a balanced mix affordable homes that supports a range of incomes. It aligns with national planning policy objectives, including those outlined in the consultation draft of the NPPF, which emphasises meeting housing needs in full and delivering a variety of affordable housing options. The weight of these planning benefits is substantial and should be recognised as a key consideration in the determination of this application.
- 3.5 In conclusion, the proposed development offers an exceptional opportunity to deliver urgently needed affordable housing in Castle Point. By addressing both current and future housing needs, it aligns with local and national policy objectives, representing a sustainable and positive contribution to the Borough's housing market. **Very substantial weight** should be given to this benefit in the planning balance.

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