

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

Land at Oakley Farm, Cheltenham

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Outline application for development comprising up to 250 residential dwellings, associated infrastructure, ancillary facilities, open space and landscaping. Demolition of existing buildings. Creation of new vehicular access from Harp Hill.

Land at Oakley Farm, Cheltenham

Robert Hitchins Limited

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Executive Summary

- i. This Proof of Evidence deals specifically with affordable housing and my consideration of the degree of weight which I believe should be applied in the context of the acute need and the woeful level of affordable housing that has been delivered in Cheltenham.
- ii. The appeal proposals seek permission for 250 dwellings, of which 40% - 100 dwellings - are proposed as affordable homes. The provision of 100 affordable homes (comprising 38 affordable rented units (38%), 32 social rented units (32%), and 30 shared ownership properties (30%)) satisfies the requirements of JCS Policy SD12 which requires 40% provisions on qualifying sites.
- iii. The affordable housing provision will be secured through a Section 106 agreement.
- iv. There is irrefutable evidence of an acute national housing crisis. The former Housing Minister described the shortage of housing in the UK as possibly the largest scandal to hit the country in the past 30 years. Esther McVey acknowledged at her RESI Convention speech in September 2019 that the housing crisis has led *“to a rise in renting and costs, and to a fall in home ownership which has destroyed the aspiration of a generation of working people.”*

“Since the mid-1990s, house prices have risen to 8 times, 10 times, 12 times, in some of the most expensive parts of this country 44 times the actual income of someone, that cannot be right”, claimed the former Housing Minister.
- v. Meanwhile in a House of Commons debate in September 2019 it was resolved that *“this House notes with concern the ongoing shortage of housing and the housing crisis across England; further notes with concern the number of families in temporary accommodation and the number of people rough sleeping; [and] acknowledges that there are over one million households on housing waiting lists...”*
- vi. In a speech on 4 March 2020 to the Planning Inspectorate, the current Housing Minister, Christopher Pincher stated that:

“I know a lot about the need for new and better homes. Because in my part of the world, houses for purchase and rent are appreciatively more expensive than in other parts of the West Midlands as we simply do not have enough homes.

There isn't a week that goes by without my constituents contacting me saying, "Chris, we just aren't able to buy or to rent the homes that we want to live in in this beautiful part of the world." (emphasis added)

- vii. More recently at his speech on 14 October 2020 to the District Councils' Network, Housing Minister Christopher Pincher stated that: "*Local plans do not provide for the ambition we have – 300,000 new homes each year – nor enough to meet the demands of organisations and such as KPMG and Shelter, both of which say we need to be building north of 250,000 homes a year to deal with the housing challenges that we have.*"
- viii. On a national level, in every scenario, against every annual need figure identified since the publication of the Barker Review in 2004, the extent of the shortfall in housing delivery in England is staggering and ranges from a shortfall of -1,105,490 to a shortfall of -2,635,490 homes over the past 17 years depending on which annual target actual housing completions are measured against. However, the true picture is that since 1969 the scale of the shortfall is over 5.5 million homes have not been provided. Not once in the last 50 years has the country built more than 300,000 homes. In January 2019, Shelter reported at least three million new homes will need to be built in England over the next 20 years to solve the housing crisis.
- ix. Analysis undertaken by Shelter and Savills in June 2020 identifies a range of scenarios for housebuilding recovery following the significant impact Covid-19 has had for the housebuilding industry and the wider economy in 2020.
- x. The scenarios anticipate that between 125,000 and 318,000 fewer new dwellings will be delivered in the five years 2020-2025, because of Covid-19, equating to a 9-23% drop in delivery. Of these, between 25,000 and 66,000 fewer affordable homes will be delivered (an 8-21% drop in delivery). Of these scenarios, the 'best case' assumes a rapid economic recovery (e.g. in light of medical advances) and the worst case assumes deeper and longer economic difficulties.
- xi. Shelter recommends boosting social housing provision in order to support overall housing output, with social housing demand being counter-cyclical to the prevailing wider economy. This merely serves to further compound the acute affordability problems that the country is facing.
- xii. As recently as May 2021, Shelter published '*Denied the Right to a Safe Home – Exposing the Housing Emergency*' which sets out in stark terms the impacts of the housing crisis. Shelter estimate that some 17 million people face the effects of high

housing costs, lack of security of tenure and discrimination in the housing market, and notably concludes that “*when it comes down to it, there’s only one way to end the housing emergency. Build more social housing*”.

Key Findings

xiii. Affordable Housing Needs in Cheltenham Borough

- Joint Core Strategy Policy SD12 does not define a numerical target for the provision of affordable homes in Cheltenham Borough, instead it requires 40% provision from qualifying sites in Cheltenham.
- The reasoned justification to the policy draws reference to the need for 638 affordable homes per annum across the Joint Core Strategy (JCS) area which is taken from the 2015 Strategic Housing Market Assessment (SHMA) Update.
- Within this JCS area need figure the 2015 SHMA Update identifies a need for 231 net affordable homes per annum in Cheltenham Borough between 2015/16 and 2031/32, equivalent to 3,696 net affordable dwellings when using 30% income thresholds.
- When comparison is drawn between affordable housing delivery and the needs identified in the SHMA Update since its 2015 base date, there has been a shortfall in the delivery of affordable housing of some -1,160 affordable homes against an identified need for 1,386 between 2015/16 and 2020/21.
- The Gloucestershire Local Housing Needs Assessment (LHNA) published in September 2020 finds a minimum net annual need of 194¹ affordable homes per annum over the 20-year period between 2021 and 2041 for the Cheltenham Borough Council area. This equates to a minimum of 3,874 net affordable dwellings over the period.
- Is it important to note that the 2020 LHNA focuses on households with the most acute housing needs but does not however take into account households currently residing in the Private Rented Sector (PRS). If these households were to be included the annual affordable housing need figure for the Borough increases significantly by 52% to 295 dwellings per annum, equivalent to 5,900 new affordable dwellings over the 20-year period.

¹ Figures do not sum due to rounding – $3,874 / 20 = 193.7$

xiv. **Affordable Housing Delivery in Cheltenham Borough and Battledown Ward**

- Since the start of the JCS period in 2011/12 and 2019/20, there have been a total of 3,570 net overall housing completions and 394 net affordable housing completions. This equates to an average of 44 net affordable housing additions to stock over the nine-year period. There has been an average rate of 11% affordable housing delivery over the period.
- Over the same period in Battledown Ward, there have been a total of 337 net overall housing completions and 44 net affordable housing completions. This equates to an average of 5 net affordable housing additions to stock per annum over the nine-year period. There has been an average rate of 13% affordable housing delivery over the period.
- These figures should also be viewed in context of the fact that since the start of the JCS period in 2011/12 there have been a total of 178 losses to affordable housing stock through the Right to Buy across the Borough in the nine-year period. This equates to an average of approximately 20 affordable dwellings lost from stock across the Borough per annum.
- It is abundantly clear that the Council have a poor performance record in terms of delivering affordable housing at a Borough and local level. A position I describe as woeful.

xv. **Future Delivery in Cheltenham Borough**

- The future delivery of affordable housing is highly uncertain. Within Cheltenham Borough the delivery of affordable homes has fluctuated considerably since the start of the JCS period in 2011/12 and the 2015 SHMA Update period in 2015/16.
- The delivery of a higher number of affordable homes one year does not guarantee this will continue for future years. The supply of affordable housing is affected by the local market factors, including the number of sites with planning permission and also wider national factors including availability of public funding.
- When the Sedgefield approach is applied in seeking to address the backlog in delivery of affordable homes which has accrued since 2015/16 compared with identified needs taken from the 2015 SHMA Update, there would be a need for 463 net affordable homes per annum for the five years period between 2021/22 and 2025/26 across the Borough.

- The Council produced its latest five-year housing land supply (5YHLS) statement in December 2019 covering the period 1 April 2019 to 31 March 2024. If we were generously to assume that all 2,265 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (i.e., 40%) as a proportion of overall housing completions, this is likely to deliver only 906 affordable dwellings over the period, equating to just 181 new affordable dwellings per annum.
- This figure falls substantially short of both the 231 per annum and 463 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach. Similarly, this figure falls below the minimum net annual need of 194 affordable homes per annum over the 20-year period between 2021 and 2041 identified in the 2020 LHNA.
- It should also be highlighted that net affordable completions in the 2019/20 monitoring period only averaged 11% of net overall housing. This further serves to demonstrate the Council are actively failing to plan to address affordable housing needs across the Borough and have been for some time.

xvi. **Affordability Indicators**

- Housing Register:

The housing register data has been updated and shows that at 1 April 2021 there were 2,514 households on the register, qualifying for assistance with their housing needs. This figure has risen by 16% in just one year, from 2,161 households at 1 April 2020. There is no specific local preference data available for Battledown Ward. However, local preference data is available for the adjoining ward of Charlton Kings which shows there are 551 households with a local need. This demonstrates that there is significant local need for affordable properties in the general area of the appeal site.

- Relets

Within Battledown Ward there is an extremely low level of annual relets. Between 2019 and 2020 there were three relets and between 2020 and 2021 there was just one home relet.

- Temporary Accommodation

At 1 April 2021 there were nine households being housed in temporary accommodation within the Borough.

- Waiting Times

There have been significant increases in waiting times in just one year between 1 April 2020 and 1 April 2021 across all but one size of affordable accommodation in Cheltenham (refer to Figure 6.2).

- Private Market Rents

Average rental costs in Cheltenham reached £837 per month in 2020/21, an increase of 13% from £744 in 2015/16 (base date of the 2015 SHMA Update).

The lower quartile monthly rents for the Borough rose by 19% over the same period, rising from £528 in 2015/16 to £625 per month in 2020/21.

Private market rents are increasingly unaffordable in the Borough, even with Local Housing Allowance support there are shortfalls in monthly rental costs ranging from -£88 to -£307 for average rental prices, to shortfalls of -£5 to -£137 for lower quartile rental properties which are typically considered to be the 'more affordable' segment of the rental market. For those in need of an affordable home in Cheltenham, the private rental market fails to provide an appropriate alternative to genuinely affordable homes.

- Affordability:

The average house price to average income ratio in This exceeds the ratio of 8 referred to by the former Prime Minister Teresa May in the Governments white paper – entitled “Fixing our Broken Housing Market”, where she, “*Today the average house costs almost eight times average earnings – an all-time record*”. Cheltenham now stands at 10. Even those seeking a home in the 'more affordable' lower quartile segment of the market would need to find almost nine times their annual income to do so with the lower quartile house price to lower quartile income ratio now standing at 8.94, a 20% increase since the start of the JCS period in 2011 where it stood at 7.44.

- House Prices:

The National Housing Federation report that the average house price in Cheltenham in 2018/19 was £332,953 which exceeds the national average. By comparison, data taken from Zoopla shows that over the past 12 months the average house price paid in Battledown Ward was £378,000.

- Tenure Profile:

Using Census 2011 data, social housing tenures comprised 19% of all households nationally. Within Cheltenham just 13% of tenures were affordable. The picture in Battledown Ward was even more bleak with just 5% of homes comprising affordable tenures. This means the prospect of households having their housing needs met in Battledown Ward is exceedingly low, especially when the level of relets averages just two a year.

- xvii. In light of the Borough's poor record of affordable housing delivery compared to the level of affordable housing needs identified I consider that the provision of 100 affordable dwellings on this site should be afforded **substantial weight** in the determination of this appeal.

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by James Stacey of Tetlow King Planning on behalf of Robert Hitchins Limited for Land at Oakley Farm, Cheltenham. It examines the affordable housing need in Cheltenham and considers the weight to be attributed to affordable housing in the overall planning balance.
- 1.2 The appeal proposals seek permission for 250 dwellings, of which 40% - 100 dwellings - are proposed as affordable homes. The provision of 100 affordable homes (comprising 38 affordable rented units (38%), 32 social rented units (32%), and 30 shared ownership properties (30%)) satisfies the requirements of JCS Policy SD12 which requires 40% provisions on qualifying sites at a split of 70:30 affordable rented to shared ownership tenures.
- 1.3 The affordable housing provision will be secured through a Section 106 agreement.
- 1.4 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision in light of evidence of need in the area. It should be read alongside the main Planning evidence of David Hutchinson and the Housing Land Supply evidence of Neil Tiley.
- 1.5 My credentials as an expert witness are summarised as follows:
 - I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England (UWE) (1997). I am a member of the Royal Town Planning Institute.
 - I have over 26 years' professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and have been in private practice since 2001. I have been a Director of Tetlow King Planning Ltd for the past ten years.
 - I act for a cross-section of clients and advise upon a diverse range of planning and housing related matters.

- During the course of my career, I have presented evidence at over 80 Section 78 appeal inquiries and hearings.
 - Both Tetlow King Planning generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plans, including the Regional Strategy, all Local Development Framework Core Strategies and many specific development plan and supplementary planning documents on affordable housing throughout the UK.
- 1.6 In accordance with the Planning Inspectorates Procedural Guidance, I hereby declare that:
- “The evidence which I have prepared and provide for this appeal reference APP/B1065/W21/3273053 this Statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions.”*
- 1.7 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. This is set out in the most up-to-date version of the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG), the National Housing Strategy and the Government’s Housing White Paper. Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.8 In researching the evidence which underpins my evidence, I have placed reliance upon a Freedom of Information (FOI) request submitted to Cheltenham Borough Council on 24 June 2021 seeking a range of information relating to affordable housing delivery. A partial response was received on 30 July 2021 followed by an additional response with the remaining data on 6 August 2021.
- 1.9 Copies of all relevant correspondence relating to the FOI requests are included within **Appendix JS1**.
- 1.10 This proof of evidence comprises the following eight sections:
- Section 2 establishes the importance of affordable housing as an important material consideration;
 - Section 3 considers the national housing crisis and the extent of the national shortfall in housing delivery;

- Section 4 analyses the development plan and related policy framework including Cheltenham Borough Council corporate documents;
- Section 5 examines the extent to which new affordable homes are being delivered towards meeting identified needs in Cheltenham Borough;
- Section 6 covers a range of affordability indicators in Cheltenham Borough;
- Section 7 considers the weight to be attached to the proposed affordable housing provision; and
- Section 8 draws together my summary and conclusions.

Affordable Housing as an Important Material Consideration

Section 2

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG in 1992 and has continued to play an important role in subsequent national planning policy, including the NPPF.
- 2.2 It has been reflected in a number of court cases including *Mitchell v Secretary of State for the Environment and Another*, Court of Appeal (1994); *ECC Construction Limited v Secretary for the Environment and Carrick District Council*, Queens Bench Division (1994); *R v Tower of Hamlets London Borough Council, ex parte Barratt Homes Ltd*, Queens Bench Division (2000).

National Planning Policy Framework (July 2021) – CD D1

- 2.3 The revised NPPF was last updated on 20 July 2021 and is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 2.4 It sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective 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*” (paragraph 8).
- 2.5 Chapter 5 NPPF (2021) focuses on delivering a sufficient supply of homes, in which paragraph 60 confirms the Government's objective of “*significantly boosting the supply of homes*”.
- 2.6 The NPPF (2021) is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include “*those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*” (paragraph 63).

- 2.7 It places a great responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. Paragraph 65 establishes that *“at least 10% of new homes on major residential developments be available for affordable home ownership”*.
- 2.8 Affordable housing is defined within the NPPF (2021) glossary as affordable housing for rent (in accordance with the Government’s rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents), Starter Homes, discounted market sales housing (at least 20% below local market value) and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.9 The PPG was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application.
- 2.10 **Appendix JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Conclusions on Affordable Housing as an Important Material Consideration

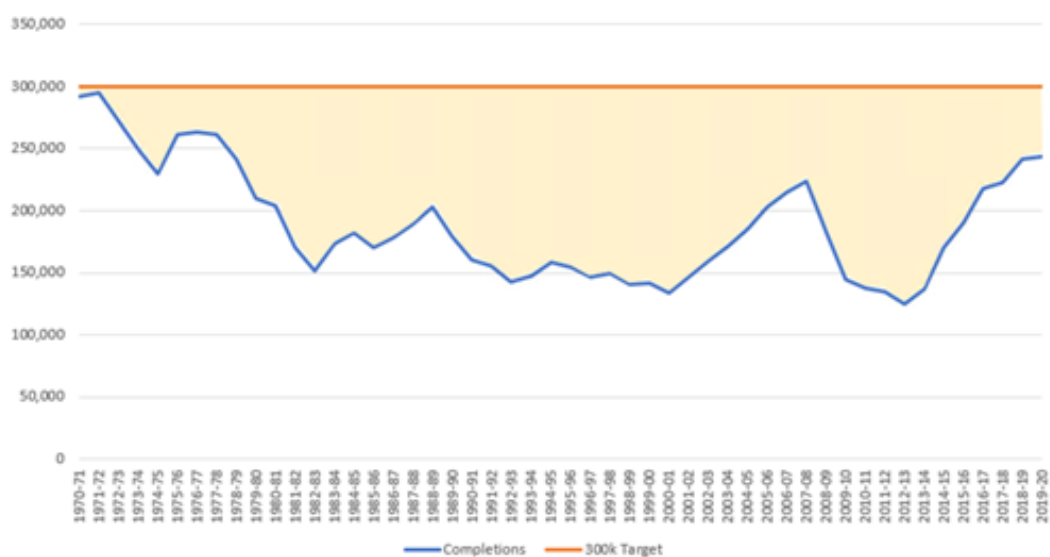
- 2.11 Within national policy, providing affordable housing has long been established as, and remains, a key national priority as part of the drive to address the national housing crisis.

The National Housing Crisis and the Extent of the National Shortfall in Housing Delivery

Section 3

- 3.1 There is irrefutable evidence of a national housing crisis, a position the Council recognised in the signed Statement of Common Ground relating to affordable housing.
- 3.2 There is an ever-increasing wealth of evidence including from the Johnson Conservative Government that unaffordability and inability to get on the housing ladder is a significant problem. I set this out in more detail in **Appendix JS3**.
- 3.3 It is widely accepted that 300,000 new homes are needed per annum and have been for quite some considerable time. The last time the country built more than 300,000 homes was in 1969. Since that time there is an accumulated shortfall of 5,542,181. This shortfall is set out in Figure 3.1 below.

Figure 3.1 National Housing Shortfall since 1970/71



Source: MHCLG Live Tables 209 and 122

- 3.4 On 6 August 2020 the Government published its consultation on the future of the planning system, entitled 'White Paper: Planning for the Future'.
- 3.5 The Planning White Paper identifies a need for radical reform. The Foreword from the Prime Minister, Boris Johnson, makes clear on page 6 the need for a whole new planning system that *“above all, that gives the people of this country the homes we*

need in the places we want to live at prices we can afford, so that all of us are free to live where we can connect our talents with opportunity.” (my emphasis).

- 3.6 In his foreword, the Secretary of State for Housing, Communities and Local Government, Robert Jenrick, states that their proposals for the planning system seek a significantly simpler, faster and more predictable system. They aim to facilitate a more diverse and competitive housing industry, providing the “*affordable housing existing communities require*” (page 8).
- 3.7 The White Paper’s introduction identifies the shortcomings of the current system, including that there is a ‘*shortage of beautiful, high quality homes...and our capacity to house the homeless and provide security and dignity*’, with particular reference to the shortage of affordable homes.
- 3.8 It goes on to say (page 12) that the current system ‘*simply does not lead to enough homes being built*’ and that ‘*the result of long-term and persisting undersupply is that housing is becoming increasingly expensive*’.
- 3.9 The Government’s desires for the new system it is consulting on includes the wish to “*increase the supply of land available for new homes where it is needed to address affordability pressures, support economic growth and the renewal of our towns and cities, and foster a more competitive housing market*” (page 14) and to create a virtuous circle of prosperity including in villages, to support their ongoing renewal and regeneration.
- 3.10 One of the Government’s proposals (number 21) is to reform the Infrastructure Levy, so that it also provides affordable housing. At paragraph 4.21, the Government states its commitment to deliver on-site affordable housing at least at present levels (this is one of its questions). The consultation however proposes that this would be secured through in-kind delivery on-site, with it being considered delivery of the reformed Levy.
- 3.11 As part of moving to the new system, in the shorter term the consultation paper contemplates at paragraph 5.4 the temporarily lifting the small sites threshold, below which developers do not need to contribute to affordable housing, to up to 40 or 50 units. The risk of this approach, however, in my opinion, is that the number of affordable houses delivered from those proposals would fall and that the new system would not make up those units lost.
- 3.12 The Prime Minister’s approach is perhaps best summed up in the summary of the press release that accompanied the launch of the consultation – ‘PM: Build, Build, Build’.

- 3.13 On a national level, in every scenario, against every annual need figure identified since the publication of the Barker Review in 2004, the extent of the shortfall in housing delivery in England is staggering and ranges from a shortfall of -1,105,490 to a shortfall of -2,635,490 homes over the past 17 years depending on which annual target actual housing completions are measured against. The Barker Review and a wealth of other evidence regarding the extent of the national shortfall in housing delivery is included at **Appendix JS4**.
- 3.14 Analysis undertaken by Shelter and Savills in June 2020 identifies a range of scenarios for housebuilding recovery following the significant impact Covid-19 has had for the housebuilding industry and the wider economy in 2020 at **Appendix JS5**.
- 3.15 The scenarios anticipate that between 125,000 and 318,000 fewer new dwellings will be delivered in the five years 2020-2025, because of Covid-19, equating to a 9-23% drop in delivery. Of these, between 25,000 and 66,000 fewer affordable homes will be delivered (an 8-21% drop in delivery). Of these scenarios, the ‘best case’ assumes a rapid economic recovery (e.g. in light of medical advances) and the worst case assumes deeper and longer economic difficulties.
- 3.16 Shelter recommends boosting social housing provision in order to support overall housing output, with social housing demand being counter-cyclical to the prevailing wider economy. This merely serves to further compound the acute affordability problems that the country is facing.
- 3.17 As recently as May 2021, Shelter published ‘*Denied the Right to a Safe Home – Exposing the Housing Emergency*’ which sets out in stark terms the impacts of the housing crisis. Shelter estimate that some 17 million people face the effects of high housing costs, lack of security of tenure and discrimination in the housing market, and notably concludes that “*when it comes down to it, there’s only one way to end the housing emergency. Build more social housing*”.

Conclusions on the National Housing Crisis and Extent of the National Shortfall in Housing Delivery

- 3.18 The evidence is clear and, in my opinion, demonstrates the pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable. A shortfall of over 5.5 million homes is nothing short of a national scandal. The evidence suggests that failure to do so will present a risk to the future economic and social stability of the United Kingdom.

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for Cheltenham Borough currently comprises the Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council Joint Core Strategy (2017) and the Cheltenham Plan (2020).
- 4.3 Other material considerations include the NPPF (2021) and the PPG, the Affordable Housing Supplementary Planning Guidance (2004), the emerging Cheltenham Plan, and the emerging Joint Core Strategy Review.

The Development Plan

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (2017) – CD E1

- 4.4 The Plan vision at section two sets out that by 2031 across the JCS authorities *“improved access to housing will have addressed the needs of young families, single people and the elderly”*.
- 4.5 In identifying key challenges at paragraph 2.29 the JCS sets out that *“for young people the key issue in the area is not just the availability of housing, but also the price of housing”*. It reports that in the JCS area the house price to earnings ratios was around 6:1 for people aged under 40 in 2011, noting that *“there has been insufficient delivery of housing in recent years to lower this ratio”*.
- 4.6 Paragraph 2.29 goes on to explain that whilst 8,266 homes were delivered across the JCS between 2006 and 2011, only 2,015² of these were affordable which equates to around 400 per annum across the entire JCS area. As a result, it notes that *“housing need in both the rural and urban areas remains a pressing issue”*.

² Equivalent to 24%

- 4.7 There are three overarching ambitions of the JCS identified with a series of strategic objectives sitting beneath these ambitions. Ambition 3: A healthy, safe and inclusive community, includes Strategic Objective 8: Delivering a Wide Choice of Quality Homes, which seeks to *“deliver good quality new housing to meet the needs of the current and future population and ensure greater affordability for all sectors of the community”*. It aims to do so by:
- *“Delivering, at least, a sufficient number of market and affordable houses; and*
 - *Delivering housing of the right size, type and tenure to ensure the creation of mixed communities located in sustainable locations with good access to jobs and services”*.
- 4.8 Policy SD12: Affordable Housing, applies a sliding scale approach to affordable housing contributions. Strategic Allocations are required to provide a minimum of 35% affordable housing. Outside of these allocations, qualifying sites within Gloucester City administrative area are required to provide 20% affordable housing, whilst qualifying sites in Cheltenham Borough and Tewkesbury Borough administrative areas are required to provide 40% affordable housing.
- 4.9 The reasoned justification to the policy at paragraph 4.12.6 states that evidence from the 2015 SHMA Update determined a need for 638³ affordable homes per annum across the JCS area.

The Cheltenham Plan (2020) – CD E2A

- 4.10 The Cheltenham Plan was adopted 20 July 2020 and runs to 2031. It supports the Joint Cores strategy of the three Councils. The Cheltenham Plan must be read in conjunction with the other documents that make up the development plan as well as the latest iteration of the National Planning Policy Framework (NPPF), as policies are not replicated from one document to another.
- 4.11 Chapter 11 – Residential Development, identifies local sites suitable for new homes and jobs while protection the natural and built environment. Policy HD4: Land off Oakhurst Rise amongst other criteria set out a minimum requirement of 25 dwellings.
- 4.12 Chapter 12 – deals with housing mix and standards, in regard to affordable, it confirms that affordable housing policy for Cheltenham is set out in the JCS (Policy SD12).

³ The 2015 SHMA Update also found that within this need figure for the JCS, there was a need for 231 affordable homes per annum in Cheltenham Borough

Other Material Considerations

Charlton Kings Parish Plan (2017) – CD E3

- 4.13 Chapter three is titled ‘Our urban environment – housing and green space’. In setting out residents’ views on development in Charlton Kings at page eight of the Parish Plan it states that the question about what type of development would be appropriate elicited many responses *“with almost every response strongly emphasising the need to prioritise the building of affordable/starter/council/social housing, especially for young people and disadvantaged groups”*.
- 4.14 The conclusions in respect of future development in Charlton Kings are also covered on page eight and reported that:
- “Respondents were mostly pragmatic in respect of identifying the likely future demand for, and need to satisfy, housing in Charlton Kings. Many went further and actively promoted the need to maintain the social mix of residents, by moving to a phase of housing provision that actively favoured starter and properly affordable homes that would allow young people and those on low incomes to own their own home”*.
- 4.15 The overall conclusions to chapter three on page 13 state that *“the Parish Council will promote and encourage affordable housing development”*.
- 4.16 The conclusions and next steps are detailed at chapter 10 on page 38 and outline the aspiration that *“people of all ages will be able to afford to live in Charlton Kings through the mix of housing available”* and acknowledge that in order to achieve this a *“range of affordable housing to be included in future developments enabling Charlton Kings to be home to people of all ages”*.

Affordable Housing Supplementary Planning Guidance (2004) – CD E4

- 4.17 The Affordable Housing Supplementary Planning Guidance (SPG) cross-referenced a Housing Needs Survey from 2000 at paragraph 5.1 which concluded that there was a need for 709 affordable homes between 2001 and 2005 in Cheltenham.
- 4.18 Paragraph 5.2 goes on to explain that a 2003 update to the 2000 survey indicated that when taking account of changes in the levels of affordability Cheltenham since 2000, there was a gross affordable housing requirement of 753 per annum.
- 4.19 At paragraph 5.6 it explained that when annual supply has been taken into account, this indicated a net requirement of 294 affordable homes per annum over the next five years (2004 to 2009) in order to meet local needs.

- 4.20 Paragraph 6.6 explained that *“in light of the considerable level of housing needs which exist in Cheltenham Borough, the Council will generally seek a minimum level of affordable housing provision amounting to 40% of total dwellings proposed”*.

Emerging Joint Core Strategy Review – Issues and Options (2018) – CD E5

- 4.21 The JCS authorities are undertaking a review of the JCS and published an Issues and Options paper for consultation between 12 November 2018 and 11 January 2019. 223 responses were received to the questionnaire, these are available to view on the Council’s website. The JCS are still to publish their formal response to representations received.
- 4.22 Section nine explains at paragraph 9.3 that the six Gloucestershire districts are currently working on a new Local Housing Needs Assessment (LHNA) which will replace the existing Strategic Housing Market Assessment (SHMA) and is intended to provide a robust evidence based around specific housing needs to provide policies to inform the JCS review.

Cheltenham Borough Corporate Plan 2019-2023 (2019) – CD E6

- 4.23 A key priority of the Plan at page 13 is *“increasing the supply of housing and investing to build resilient communities”*. It identifies that success will be measured as *“work[ing] with partners to increase the supply of new homes in the Borough”*.

Housing and Homelessness Strategy 2018-2023 – CD E7

- 4.24 The foreword to the Strategy by Councillor Pete Jeffries, Deputy Leader of the Council and Cabinet Member for Housing, states that *“everyone should have the right to a decent affordable home; this is something I passionately believe. At present Cheltenham doesn’t have all the homes that local people need”*.
- 4.25 At section 1.1 the Strategy outline a number of constraints that compromise the supply of affordable housing. These include:
- *“The National Planning Policy Framework, which has introduced a policy that enables developers to reduce their affordable housing contributions, potentially to zero, where they can demonstrate that the financial viability of a scheme would otherwise be compromised. Whilst this policy may have the benefit of stimulating the market and bringing about development on what might otherwise be stalled sites, the consequence is that fewer affordable homes are being provided locally.”*

- *“Recent relaxations in the Right to Buy criteria, which have led to greater discounts for tenants and a shortening of the period (from 5 years to 3 years) for which a tenant needs to reside in social housing in order to be eligible to buy their home, have incentivised the take-up of right to buy, which in turn has reduced the supply of affordable homes”*; and
 - *“Whilst councils are able to retain an element of their Right to Buy receipts on homes sold, there are restrictions over how these receipts can be used, and this has the effect of limiting our options to increase supply”*.
- 4.26 Section 1.4 analyses local pressures in the Borough and reports that the number of affordable housing completions has fallen in recent years and that this has been compounded by high house prices which have led to more households seeking private rented accommodation as a solution to their housing needs. However, it sets out that this in turn has pushed up the price of the private rental market and the Government’s freeze on welfare benefits have meant that benefits have failed to keep pace with these increases in rents. This has forced many lower income households out of the private rented sector.
- 4.27 The vision, detailed in section two has four key outcomes, the first of which is “increasing the provision of affordable housing” which is covered in more detail at page 11 where it recognises that “Cheltenham has some of the highest house prices in the South West”.
- 4.28 It goes on to detail that “real earnings are failing to keep pace with house price rises and these pressures are set to grow, as the population both within Cheltenham and more generally within the Joint Core Strategy area continues to grow”.
- 4.29 In discussing the specific affordable housing requirements of the Borough, on page 11 the Strategy goes on to set out that the 2015 SHMA Update identified a requirement for 231 affordable homes per annum in Cheltenham between 2015 and 2031, totalling 3,696 affordable homes. It considers that there is a potential supply of around 2,654 affordable homes (from commitments and allocations) leaving an unmet requirement of 1,042 affordable homes.
- 4.30 It recognises that this figure may increase if viability issues are presented on S106 sites, resulting in a loss of affordable homes, or if S106 sites become stalled. It acknowledges that *“Affordable housing delivery in the last three years in particular has been poor, with the number of completions for 2014/15, 2015/16 and 2016/17 being*

24, 34 and 52 respectively” and concludes that *“this simply cannot be allowed to continue”*.

- 4.31 At page 12 the Strategy accepts that the Council relies significantly on the market to provide affordable housing through landowners S106 obligations and notes that “if sites do not come forward in a timely manner, then housing supply generally will be affected, and this in turn will affect the delivery of the majority of our affordable housing supply”.
- 4.32 In discussing the private rented sector at page 14, the Strategy recognises that private rental rates in Cheltenham have increased significantly in recent years, reflecting the fact that demand is outpacing supply and reports that “this is hardly surprising given that home ownership is now out of reach for many, in particular young people”.
- 4.33 Another key outcome identified by the Strategy is ‘tackling homelessness’. At page 22 the Strategy examines the causes of homelessness and finds that “by far the main cause of homelessness in Cheltenham is loss of private rented accommodation”
- 4.34 At pages 24-25 the Strategy reports on future trends and notes that the continued freeze on Local Housing Allowance (LHA) will create even more pressures on low-income households trying to access and remain in the private rented sector, should rents continue to rise. It anticipates that the loss of private rented accommodation will continue to remain the main cause of homelessness in Cheltenham.

Conclusions on the Development Plan and Related Policies

- 4.35 The Development Plan for Cheltenham Borough currently comprises the Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council Joint Core Strategy (2017) and the Cheltenham Plan (2020).
- 4.36 At a national level the direction of travel to address housing need and supply, including affordable housing, is abundantly clear. It is my opinion that the evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Cheltenham.
- 4.37 The appeal proposals provide an affordable housing contribution which exceeds requirements of JCS Policy SD12. The 100 affordable homes will make a substantial contribution towards the annual affordable housing needs of the Borough, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in section five of my evidence.

Affordable Housing Needs and Delivery in Cheltenham

Section 5

Affordable Housing Needs

- 5.1 JCS Policy SD12 does not define a numerical target for the provision of affordable homes in Cheltenham Borough, instead it requires 40% provision from qualifying sites in Cheltenham. The reasoned justification to the policy draws reference to the need for 638 affordable homes per annum across the JCS area which is taken from the 2015 SHMA Update (**CD F1**).
- 5.2 Within this SHMA Update need figure for the JCS area there is an identified need for 231 net affordable homes per annum in Cheltenham Borough between 2015/16 and 2031/32, equivalent to 3,696 net affordable dwellings when using 30% income thresholds.
- 5.3 The 2015 SHMA Update also sets out alternative net annual affordable housing need figures for the Borough over the same period when calculated using a variety of other income thresholds. These are set out in Figure 5.1 below.

Figure 5.1: Net Annual Affordable Housing Need Adjusted Using Gross Household Income

Gross Income Threshold	Annual Need (2015/16 to 2031/32)	Total Need (2015/16 to 2031/32)
25%	431	6,896
30%	302	4,832
35%	231	2,432
40%	86	1,376

Source: 2015 SHMA Update, Table A1.13

- 5.4 Since the production of the SHMA Update in 2015 there has only been one other assessment of local housing need commissioned for the JCS area and by proxy Cheltenham Borough Council.

- 5.5 The Gloucestershire Local Housing Needs Assessment (LHNA) **(CD F2)** was published in September 2020 and finds a minimum net annual need of 194⁴ affordable homes per annum over the 20-year period between 2021 and 2041 for the Cheltenham Borough Council area. This equates to a minimum of 3,874 net affordable dwellings over the period.
- 5.6 Is it important to note that the 2020 LHNA focuses on households with the most acute housing needs but does not however take into account households currently residing in the private rented sector (PRS).
- 5.7 This is because 2020 LHNA was prepared on the basis that it assumes that households in receipt of housing benefit within the PRS are not in need of affordable housing. This is a very odd conclusion and one that serves to mask housing need, since it excludes those who need state financial assistance to even access the rental sector. Such people on any view are in need of affordable housing. Where there is a shortage in affordable housing – then inevitably the PRS sector ends up accommodating those in housing need who would otherwise be homeless but whose entitlement to housing benefit enables them to access a home.
- 5.8 Section 6 of this Proof of Evidence finds that even with Local Housing Allowance support there are shortfalls in monthly rental costs ranging from -£88 to -£307 for average rental prices, to shortfalls of -£5 to -£137 for lower quartile rental properties which are typically considered to be the ‘more affordable’ segment of the rental market.
- 5.9 Furthermore, the councils own Homeless Strategy **(CD E7)** acknowledges this issue setting out clearly at paragraph 1.2 that:
- ‘The number of new affordable housing completions has fallen in recent years, largely due to our reliance on delivery through s.106 provision. These pressures have been compounded by high house prices, which have led to more households seeking private rented accommodation as a solution to their housing needs. This in turn has pushed up the price of the private rented market. The government’s introduction of the freeze on welfare benefits, most notably Local Housing Allowance, has meant that benefits have failed to keep pace with these increases in rents, forcing many low-income households out of the private rented sector.’* (my emphasis).
- 5.10 The 194 per annum figure should therefore be considered as a minimum at best.

⁴ Figures do not sum due to rounding – 3,874 / 20 = 193.7

- 5.11 It is commonly accepted that the PRS should not be regarded as a form of affordable housing. Indeed, the PRS is not within the definition of affordable housing set out in the 2021 NPPF and this has been emphasised through numerous examples such as the Eastleigh Local Plan examination (**CD F9**), in which the Inspector’s report states at Paragraph 34:

“There is no justification in the Framework or Guidance for reducing the identified need for affordable housing by the assumed continued role of the PRS with LHA. This category of housing does not come within the definition of affordable housing in the Framework. There is not the same security of tenure as with affordable housing and at the lower-prices end of the PRS the standard of accommodation may well be poor”.

- 5.12 The 2020 LHNA appears to acknowledge this lack of security in the PRS at paragraph 9.6 by stating *“As the PRS expands and other sectors contract, it is clear that many households who would traditionally meet their housing needs in other sectors are now renting privately. This includes many households currently unable to afford their housing costs, which can be seen from the expansion of families receiving Housing Benefit in the sector, in particular since the start of the most recent recession.”*

- 5.13 However, at paragraph 9.10, the 2020 LHNA states that *‘it remains appropriate to recognise that the private rented sector will continue to make an important contribution towards providing housing options for households unable to afford their housing costs in future.’*

- 5.14 In light of this, I suggested that the 2020 LHNA underestimates the extent to which affordable housing is required within the Cheltenham administrative area. If these households were to be included the annual affordable housing need figure for the Borough increases significantly by 52% to 295⁵ dwellings per annum over the period.

Past Affordable Housing Delivery in Cheltenham Borough

- 5.15 Figure 5.2 illustrates the delivery of affordable housing in Cheltenham Borough over the nine-year period between 2011/12⁶ and 2019/20.

⁵ See 2020 LHNA Figure 62: 1,510 + 2,022 + 2,364 = 5,896 / 20 years = 294.8 affordable dwellings per annum

⁶ Start of JCS period

Figure 5.2: Net Housing and Affordable Housing Completions in Cheltenham Borough

Monitoring Period	Overall Housing Completions (Net)	Affordable Housing Completions (Net)	Affordable Housing as a %age of Overall Housing
2011/12	36	8	22%
2012/13	266	88	33%
2013/14	413	119	29%
2014/15	316	15	4%
2015/16	397	-17	-4%
2016/17	296	-11	-4%
2017/18	594	85	14%
2018/19	776	53	7%
2019/20	476	54	11%
Total	3,570	394	11%

Source: Freedom of Information Response (30 July and 6 Aug 2021)

- 5.16 I note that the Freedom of Information response details that an additional 62 affordable dwellings were delivered in Cheltenham in 2020/21, but I am unable to compare this data as a percentage of total completions due to a lack of data for total housing completions in 2020/21⁷.
- 5.17 Since the start of the JCS period in 2011/12 there have been a total of 3,570 net overall housing completions and 394 net affordable housing completions.
- 5.18 This equates to an average of 44 net affordable housing additions to stock over the nine-year period. There has been an average rate of 11% affordable housing delivery over the period.

Affordable Housing Delivery in Battledown Ward

- 5.19 Figure 5.3 illustrates the delivery of affordable housing in Battledown Ward over the nine-year period between 2011/12⁸ and 2019/20.

⁷ see Appendix JS1

⁸ Start of JCS period

Figure 5.3: Net Housing and Affordable Housing Completions in Battledown Ward

Monitoring Period	Overall Housing Completions (Net)	Affordable Housing Completions (Net)	Affordable Housing as a %age of Overall Housing
2011/12	3	25	833%
2012/13	4	17	425%
2013/14	2	11	550%
2014/15	18	-1	-6%
2015/16	23	0	0%
2016/17	33	-2	-6%
2017/18	109	-3	-3%
2018/19	35	-1	-3%
2019/20	110	-2	-2%
Total	337	44	13%

Source: Freedom of Information Response (30 July and 6 Aug 2021)

- 5.20 Since the start of the JCS period in 2011/12 there have been a total of 337 net overall housing completions and 44 net affordable housing completions.
- 5.21 This equates to an average of 5 net affordable housing additions to stock per annum over the nine-year period. There has been an average rate of 13% affordable housing delivery over the period.

Losses to Social Housing Stock through the Right to Buy

- 5.22 Research published by the Local Government Association (LGA) in April 2018⁹ indicated 12,224 were homes sold under the scheme in 2017. Should these levels of sales remain consistent, with continuing borrowing restrictions, the research calculated that in 2023 councils will only be able to replace 2,000 of these homes. The LGA stated that *“Councils are being hampered in replacing homes because a portion of all receipts are given to the Treasury, rather than reinvested in housing.”*
- 5.23 The representative for Councils in England and Wales noted that in the past six years more than 60,000 homes have been sold off at an average price of half the market rate. This means that councils can fund to build or buy just 14,000 replacement homes.
- 5.24 It is also of relevance to note that only 30% of Right to Buy receipts can be retained to use for affordable housing provision and £17,000 of each Right to Buy receipt has to be paid into the Attributable Debt Pot to cover Housing Revenue Account debt.

⁹ Local Government Association: Sustainability of Right to Buy (April 2018)

- 5.25 At a national level, almost two million households have exercised their right to buy since it was introduced in 1980. *‘Fixing the Foundations’ (2015) confirmed that the Government is committed to extending the Right to Buy to housing association tenants, noting that “since the Right to buy for council tenants was reinvigorated in the last Parliament, the number of sales has increased by nearly 320%”.*
- 5.26 The Government recently undertook a Voluntary Right to Buy pilot scheme with a limited number of RPs in a limited area. It is understood that plans are still being drawn up to extend this to all tenants but that the publication of Guidelines for the Voluntary Right to Buy has been delayed by the Brexit vote. In the Government’s Autumn Statement, Chancellor Philip Hammond, outlined that there would be a large-scale regional pilot scheme of Right to Buy for housing association tenants.
- 5.27 In my opinion, the extension of Right to Buy to Housing Association tenants would seriously increase the loss of existing affordable housing stock, putting increasing pressure on the need to deliver more affordable homes in Cheltenham in the future.
- 5.28 This was acknowledged by the Inspector presiding over the appeal at land at Site of Former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019 (**CD K3**). Paragraph 14.108 of the Inspector’s Report sets out that:
- “Mr Stacey’s unchallenged evidence shows that only 2,757 new affordable homes were provided in the City over the first 6 years of the plan period. This represents less than half of the target provision and a net increase of only 151 affordable homes if Right to Buy sales are taken into account. On either measure there has been a very low level of provision against a background of a pressing and growing need for new affordable homes in Birmingham.”* (emphasis added)
- 5.29 This approach was endorsed by the Secretary of State, who stated that the 800 family homes, including up to 280 affordable homes, was a benefit of significant weight.
- 5.30 Figure 5.4 illustrates the rate of affordable housing stock being lost through the Right to Buy in Cheltenham Borough and Battledown Ward over the nine-year period between 2011/12¹⁰ and 2019/20.

¹⁰ Start of JCS period

Figure 5.4: Right to Buy Losses to Affordable Housing Stock in Cheltenham Borough and Battledown Ward

Monitoring Period	Cheltenham Borough RtB losses to stock	Battledown Ward RtB losses to stock
2011/12	7	0
2012/13	13	0
2013/14	28	0
2014/15	13	0
2015/16	22	0
2016/17	28	0
2017/18	26	0
2018/19	21	1
2019/20	20	0
Total	178	1

Source: Freedom of Information Response (30 July and 6 August 2021)

- 5.31 Since the start of the JCS period in 2011/12 there have been a total of 178 losses to affordable housing stock through the Right to Buy across the Borough. This equates to an average of 20 affordable dwellings lost from stock across the Borough per annum.
- 5.32 Only one loss has occurred in Battledown Ward over the past nine-years.
- 5.33 This issue is also acknowledged on the Borough Council's website where it states that *"should the number of affordable dwellings in Cheltenham continue to decrease, this will inevitably place even greater pressure on existing housing to meet housing needs"*.

Figure 5.5: Extract from Cheltenham Borough Council website

Requirement for affordable housing

Cheltenham Borough Council faces significant challenges in relation to the affordability of homes in the town. A combination of high average house prices and relative constraints on developable land has resulted in a significant unmet need for affordable housing in Cheltenham Borough. As of August 2020, the **UK House Price Index** indicated that the average house price in England stands at £256,109, with the South West having an average house price of £264,886. In comparison, Cheltenham borough's average house price as of August 2020 stood at £280,199, 9% greater than English average and 6% greater than South West average respectively.



Clearly, therefore, increasing the provision of affordable housing in Cheltenham is a key priority for the council. We recognise that increasing the delivery of affordable homes can provide a critical safety net to help tackle and prevent homelessness and rough-sleeping, reducing the reliance upon temporary accommodation, as well as creating strong, resilient communities with a sense of belonging.

Between April 2015 and April 2020, the total amount of Council and Registered Provider (housing association) affordable homes in Cheltenham borough has risen slightly, from 6,873 homes in 2015 to 6,935 homes in 2020, despite the loss of 126 council affordable homes over this period through Right to Buy, in addition to the demolition of 44 affordable homes.

In terms of new affordable housing provision, since April 2015 Cheltenham has delivered 340 new affordable homes, with an average annual delivery of 68 affordable homes, this is broken down as follows:

- 2015-2016- 34 affordable homes delivered
- 2016-2017- 35 affordable homes delivered
- 2017-2018- 112 affordable homes delivered
- 2018-2019- 80 affordable homes delivered
- 2019-2020- 79 affordable homes delivered

Additionally, our **current Local Housing Needs Assessment (LHNA)** identifies a need for Cheltenham borough to deliver 3,874 new affordable homes (194 per annum) between 2021 and 2041.

Comparing this identified need against our prior delivery over the past 5 years indicates that demand for affordable housing in Cheltenham continues to significantly outstrip supply. As of October 2020, the council had 2,180 households on our housing register waiting for a new affordable home. However, between April 2015- October 2020, affordable housing need in Cheltenham was more than three times greater than the actual supply of new affordable homes.

Source: https://www.cheltenham.gov.uk/info/49/housing_strategy_and_enabling/635/housing_enabling [accessed 30 July 2021]

- 5.34 It is unclear why the affordable housing completions figures shown in Figure 5.5 do not align with the affordable housing completions provided in the Councils Freedom of Information (FOI) response (**Appendix JS1**) which have been replicated in Figure 5.2 above. For the purposes of this appeal, I have assumed the figures in the FOI response are the correct affordable housing completions figures for the Borough.

Affordable Housing Delivery Compared to Objectively Assessed Needs

- 5.35 When a comparison is drawn between affordable housing delivery and the needs identified in the SHMA Update since its 2015 base date, it can be seen in Figure 5.6 that there has been a shortfall in the delivery of affordable housing of some -1,160 affordable homes against an identified need for 1,386 over the same period.

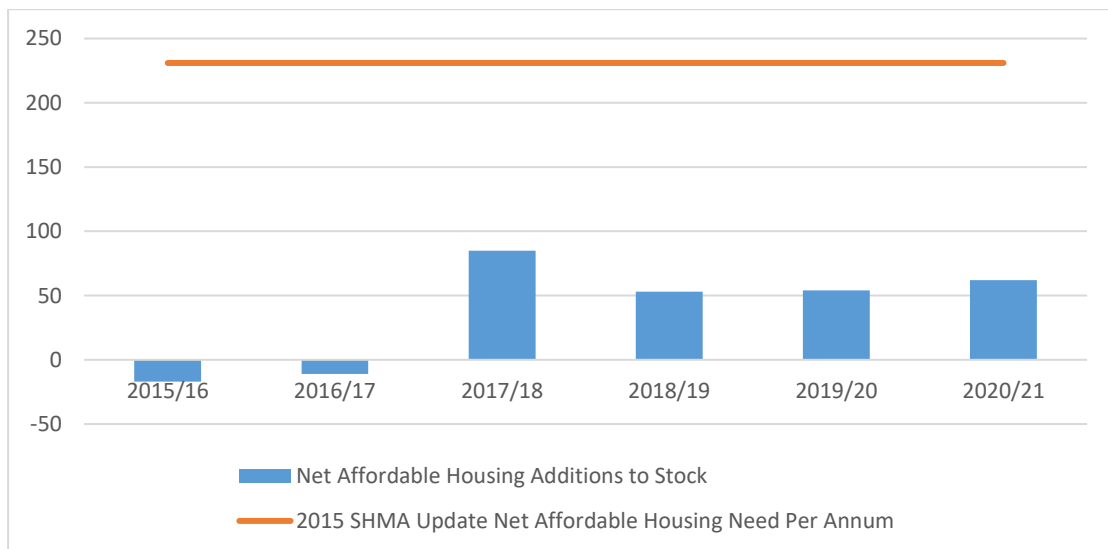
Figure 5.6: Net Affordable Housing Delivery in Cheltenham Borough Compared with the 2015 SHMA Update Identified Needs

Monitoring Period	Additions to Affordable Housing Stock (Net)	2015 SHMA Update Identified Needs ¹¹ (Net)	Shortfall	Shortfall a % of Identified Needs
2015/16	-17	231	-253	-110%
2016/17	-11	231	-246	-106%
2017/18	85	231	-146	-63%
2018/19	53	231	-174	-75%
2019/20	54	231	-196	-85%
2020/21	62	231	-169	-73%
Total	226	1,386	-1,160	-84%

Source: Freedom of Information Response (30 July 2021) and 2015 SHMA Update

- 5.36 The sheer scale of the Council's persistent failure to meet identified needs is better illustrated graphically, as shown in Figure 5.7.

Figure 5.7 Affordable Housing Delivery Compared to Identified Affordable Housing Needs



Source: Freedom of Information Response (30 July 2021) and 2015 SHMA Update

- 5.37 The 100 affordable homes provided by the appeal proposals represents the equivalent of 44% of the total number of affordable homes delivered across the entire Borough since the 2015 SHMA Update base period in 2015/16.

¹¹ Need calculated using 35% gross income threshold

Future Affordable Housing Delivery in Cheltenham Borough

- 5.38 The future delivery of affordable housing is highly uncertain. Within Cheltenham Borough the delivery of affordable homes has fluctuated considerably since the start of the JCS period in 2011/12 and the 2015 SHMA Update period in 2015/16 as illustrated in Figure 5.2 and 5.6, respectively.
- 5.39 The delivery of a higher number of affordable homes one year does not guarantee this will continue for future years. The supply of affordable housing is affected by the local market factors, including the number of sites with planning permission and also wider national factors including availability of public funding.
- 5.40 The 2015 SHMA Update identifies an objectively assessed need for 231 net affordable homes per annum between 2015/16 and 2031/32. Over the 16-year period this equates to a total need for 3,696 net affordable homes.
- 5.41 Since 2015/16, the Council have overseen the delivery of 226 net affordable homes against a need of 1,386 net new affordable homes which has resulted in a shortfall of -1,160 affordable homes in just six years.
- 5.42 I consider that any shortfall in delivery should be dealt with within the next five years. This is also an approach set out within the PPG¹² and endorsed at appeal.
- 5.43 The Inspector presiding over the appeal at land off Aviation Lane, Burton-upon-Trent which was allowed in October 2020 (**CD K11**) set out at paragraph 8 of her decision that:
- “In my view, the extent of the shortfall and the number of households on the Council’s Housing Register combine to demonstrate a significant pressing need for affordable housing now. As such, I consider that, the aim should be to meet the shortfall as soon as possible.” (my emphasis).*
- 5.44 Similarly, in considering the disputed sites in the Council’s five-year housing land supply that did not yet have planning permission the Inspector stated at paragraph 9 that:
- ‘I am not convinced, in accordance with the guidance in the PPG and the Framework, that there is clear evidence that the 108 dwellings relied on by the Council from these two sites would be deliverable within five years. There is nothing within the Framework*

¹² Paragraph: 031 Reference ID: 68-031-20190722

or the PPG to suggest that this definition should not apply to affordable housing as well as market housing.' (my emphasis).

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

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

5.46 It is therefore imperative that the -1,160 dwelling affordable housing shortfall which has accumulated since 2015/16 is addressed within the next five years. When the shortfall is factored into the 2015 SHMA's Updates identified need of 231 affordable homes per annum for the period 2015/16 to 2031/32, the number of affordable homes the Council will need to complete substantially increases to 463 per annum for the period 2021/22 to 2025/26.

5.47 This would ensure that for the remainder of the period to 2031/32 the annual affordable housing need reduces to 231 per annum to deal solely with newly arising needs. This is illustrated in Figures 5.8 and 5.9.

Figure 5.8: Annual Affordable Housing Need incorporating Backlog Needs since the 2015 base date of the 2015 SHMA Update (Applying the Sedgefield Approach)

A	Affordable housing need per annum for the period 2015/14 to 2020/21 identified in the 2015 SHMA Update	231
B	Net Affordable housing need for the period 2015/14 to 2020/21 (A x 6)	1,386
C	Net Affordable housing completions for the period 2015/14 to 2020/21	226
D	Shortfall/backlog of affordable housing need for the period 2015/14 to 2020/21 (B – C)	1,160
E	Backlog affordable housing need per annum required over the period 2021/22 to 2025/26 (D/5)	232
F	Full affordable housing need per annum for the period 2021/22 to 2025/26 (A + E)	463
G	Full affordable housing need for the period 2021/22 to 2025/26 (F x 5)	2,315

- 5.48 Further illustration of the severity of the situation can be seen in Figure 5.9 which illustrates that the Council need to deliver 2,315 net affordable homes over the next five years to address backlog needs in line with the Sedgefield approach.
- 5.49 Between 2011/12 and 2019/20, the Council delivered a total of just 394 net affordable homes, equivalent to an average of a mere 44 homes per year. It is clear that the backlog affordable housing needs within the Borough will continue to grow exponentially unless the Council takes drastic action to address the needs and deliver more affordable homes.

Figure 5.9: Annual Affordable Housing Need 2021/22 to 2025/26 incorporating Backlog Needs Accrued Since 2015/16 and applying the Sedgefield Approach

Monitoring Period	Net Affordable Housing Need – 2015 SHMA Update	Net Affordable Housing Need When Addressing Backlog Within Next Five Years
2021/22	231	463
2022/23	231	463
2023/24	231	463
2024/25	231	463
2025/16	231	463
Total	1,155	2,315

- 5.50 The Council produced its latest five-year housing land supply (5YHLS) statement in December 2019 covering the period 1 April 2019 to 31 March 2024 (**CD F3**).
- 5.51 If we were generously to assume that all 2,265 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (i.e. 40%) as a proportion of overall housing completions this is likely deliver only 906 affordable dwellings over the period, equating to just 181 new affordable dwellings per annum.
- 5.52 As figure 5.2 of this proof highlights, affordable housing provision has slipped far below the policy compliant 40% in recent years, most recently showing that net affordable completions in the 2019/20 monitoring period only averaged 11% of net overall housing completions. This demonstrates that the Council are actively failing to plan to address affordable housing needs across the Borough and have been for some time.
- 5.53 Regardless, the 181 annual future delivery figure falls substantially short of both the 231 per annum and 463 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach. Similarly, this

figure falls below the minimum net annual need of 194 affordable homes per annum over the 20-year period between 2021 and 2041 identified in the 2020 LHNA.

- 5.54 I have no confidence that the council can see a sufficient step change in the delivery of affordable housing to meet the new annual needs requirements. It makes it even more important that suitable sites, such as the appeal site, being granted planning permission in order to boost the supply of affordable housing.
- 5.55 In light of the Council's abysmal record of affordable housing delivery, the anticipated levels and rates of future affordable housing delivery in Cheltenham Borough Council and the level of affordable housing needs identified there can be no doubt that the provision of up to 100 affordable dwellings on this site to address the Borough-wide needs of Cheltenham Borough should be afforded **substantial weight** in the determination of this appeal.

Conclusions on Affordable Housing Needs and Past Delivery

- 5.56 On a borough-wide basis, in the nine-year period between 2011/12 and 2019/20 net affordable housing delivery represented just 11% of overall net housing delivery. Average delivery on a per annum basis over the same period has been just 44 net affordable homes per annum.
- 5.57 In Battledown Ward for the nine-year period between 2011/12 and 2019/20 net affordable housing delivery represented 13% of overall net housing delivery. Average delivery on a per annum basis over the same period has been 5 net affordable homes per annum.
- 5.58 The Borough's performance in delivering affordable housing is failing to meet the needs of its residents, which has resulted in an accumulated shortfall of -1,160 households not having their housing needs met in just six years, against a net need of 1,386 affordable dwellings.
- 5.59 In light of the Borough's poor record of affordable housing delivery and the level of affordable housing needs identified within Cheltenham Borough there can be no doubt that the provision 100 affordable dwellings on this site should be afforded **substantial weight** in the determination of this appeal.

Affordability Indicators in Cheltenham

Section 6

Market Signals

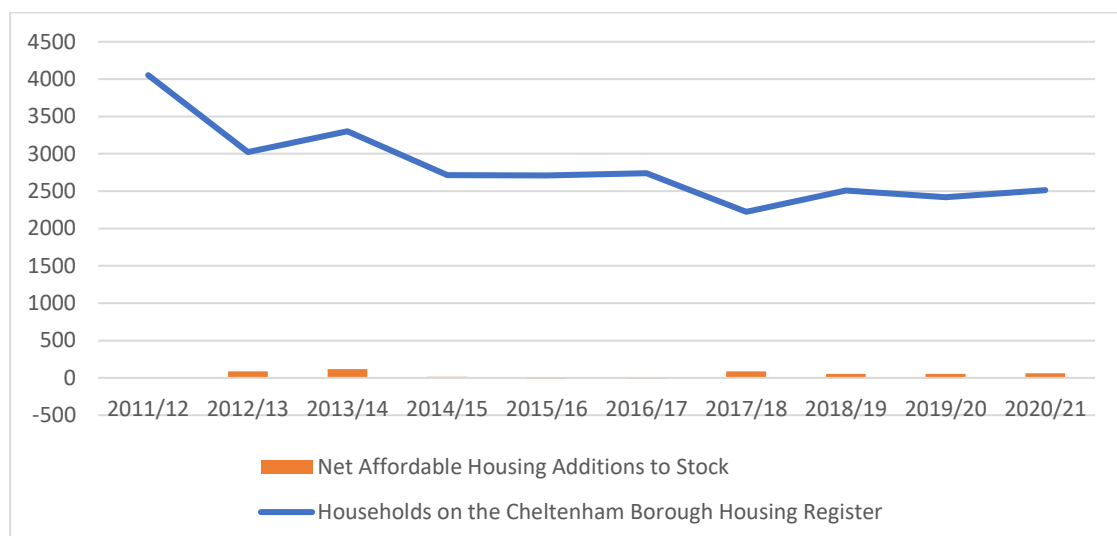
6.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of Plan making.

Cheltenham Borough Housing Register

6.2 At 1 April 2021, there were 2,514 households on the Borough’s Housing Register. This figure has risen by 16% in just one year, previously standing at 2,161 at 1 April 2020. There is no specific local preference data available for Battledown Ward. However, local preference data is available for the adjoining ward of Charlton Kings which shows there are 551 households with a local need. This demonstrates that there is significant local need for affordable properties in the general area of the appeal site.

6.3 Figure 6.1 illustrates changes in the Housing Register and the delivery of affordable homes in Cheltenham over the 10-year period since 2011/12. This illustrates that the rate of affordable housing delivery in the Borough has persistently failed to meet identified needs on the Housing Register.

Figure 6.1: Cheltenham Borough Housing Register and Affordable Housing Delivery



Source: MHCLG Live Table 685, Residential Land Availability Report (February 2020); Freedom of Information Response (30 July 2021)

- 6.4 The Borough is part of the Homeseeker Plus Partnership which comprises Cheltenham Borough Council, Cotswold District Council, Gloucester City Council, Stroud District Council, Tewkesbury Borough Council, Forest of Dean District Council and West Oxfordshire District Council as well as Registered Providers.
- 6.5 The Housing Allocations Policy (**CD F4**) covering all the Homeseeker Plus authorities details local connection criteria at section 11. Paragraph 11.1 states that *“due to the exceptional demand for housing across the Homeseeker Plus area and the difficulty in solving local housing need, preference will usually be given to applicants with a local connection to the appropriate district”*.
- 6.6 It explains that each authority may set quotas of dwellings available for cross boundary moves, if necessary, to increase mobility but will balance this against the local connection requirements.
- 6.7 Paragraph 11.2 defines local connection as:
- Those who are normally resident in the local authority area, and that residence is or was of their own choice (for six of the last 12 months or there of the last five years);
 - Those employed in the local authority area (permanent employment, not seasonal or temporary);
 - Those who have family connections in the local authority area (immediate family members who have lived in the area for five years); and
 - Members of the armed forces have a local connection to the district of their choice (those currently serving, served within the immediate preceding 5 years; bereaved spouse or civil partner who has recently or will cease to be entitled to Ministry of Defence accommodation following the death of their service spouse and the death was wholly or partly attributable to their service; existing or former members of the reserve forces who are suffering from a serious injury, illness or disability which is wholly or partly attributable to their service).
- 6.8 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. affordable rented, starter homes, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low cost homes for

sale and rent to buy, provided to eligible households whose needs are not met by the market.

- 6.9 As such the number of households on the Housing register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.
- 6.10 The wait to be housed in an affordable home within Cheltenham is set out at figure 6.2 below and presents further stark evidence of the acute affordable housing crisis afflicting the Borough.
- 6.11 There have been significant increases in waiting times in one year between 1 April 2020 and 1 April 2021 across all sizes of affordable accommodation, with the exception of 1-bed accommodation which itself still has a waiting time of eight months at 1 April 2021.

Figure 6.2: Average Affordable Accommodation Waiting Times in Cheltenham

Affordable Accommodation Type	Average Waiting time at 1 April 2020	Average waiting time at 1 April 2021
Sheltered accommodation	n/a	9 months
Studio general needs	11 weeks	22 months
1-bed general needs	11 months	8 months
2-bed flat or maisonette	5 months	7 months
2-bed house	11 months	20 months
3-bed flat or maisonette	8 months	15 months
3-bed house	15 months	20 months
4-bed	10 months	16 months
5-bed	11 months	n/a

Source: Freedom of Information Response (30 July 2021)

- 6.12 The extent of the affordable housing crisis within Cheltenham Borough is such that at 1 April 2021 there were nine households being housed in temporary accommodation within the Borough (**See Appendix JS1**).
- 6.13 Within Battledown Ward there is an extremely low level of annual relets. Between 2019 and 2020 there were three relets and between 2020 and 2021 there was just one home relet.

Private Rental Market in Cheltenham Borough

- 6.14 Average rental costs in Cheltenham reached £837 per month in 2020/21, an increase of 13% from £744 in 2015/16 (base date of the 2015 SHMA Update).
- 6.15 The lower quartile monthly rents for the Borough rose by 19% over the same period, rising from £528 in 2015/16 to £625 per month in 2020/21.
- 6.16 It is important to consider this in the context of the level of Local Housing Allowance (LHA) available to qualifying residents of the Borough. Figure 6.3 illustrates the disparity between not only average private market rents in the borough but also lower quartile private rents, whilst illustrating the relative affordability of Registered Provider rents to lower income households.

Figure 6.3: Comparison of Monthly Rental Costs with Local Housing Allowance in Cheltenham

No. Bedrooms	of	Average Monthly Private Rent	Maximum Monthly LHA Rate ¹³	Disparity between LHA and Average Monthly Private Rent
1-Bedroom		£632	£544	-£88
2-Bedroom		£823	£688	-£135
3-Bedroom		£1,088	£841	-£247
4+ Bedroom		£1,490	£1,183	-£307
No. Bedrooms	of	Lower Quartile Monthly Rent	Maximum Monthly LHA Rate ¹⁴	Disparity between LHA and Lower Quartile Rent
1-Bedroom		£550	£486	-£64
2-Bedroom		£700	£623	-£77
3-Bedroom		£895	£758	-£137
4+ Bedroom		£1,050	£1,045	-£5

Source: Directgov website, ONS Private Rental Market Statistics (2020/21)

- 6.17 The evidence demonstrates that private market rents are increasingly unaffordable in the Borough, even with LHA support there are shortfalls in monthly rental costs ranging from -£88 to -£307 for average rental prices, to shortfalls of -£5 to -£137 for lower quartile rental properties which are typically considered to be the 'more affordable' segment of the rental market. For those in need of an affordable home in Cheltenham, the private rental market fails to provide an appropriate alternative to genuinely affordable homes.

¹³ Figures based on weekly LHA Rate multiplied by 4.3 to represent monthly LHA rate available

¹⁴ Figures based on weekly LHA Rate multiplied by 4.3 to represent monthly LHA rate available

Average House Prices in Cheltenham Borough

- 6.18 The National Housing Federation (NHF) produce an annual report for each of the regions in England, looking at various elements of the housing market across each area.
- 6.19 The September 2020 Home Truths report (**Appendix JS6**) for the South West covering the 2018/19 period identifies the ratio of average house prices to average incomes in Cheltenham stands at 10. This means that average house prices in the Borough are more than 10 times average incomes. This exceeds the ratio of 8 referred to by the former Prime Minister Teresa May in the Governments white paper – entitled “Fixing our Broken Housing Market”, where she, “*Today the average house costs almost eight times average earnings – an all-time record*”.
- 6.20 The report also found that whilst an income of £76,104 per annum would be required in order to obtain an 80% mortgage¹⁵ in the Borough, by comparison the average annual earnings in the Borough in 2018/19 were £32,583¹⁶.
- 6.21 In terms of house prices themselves, the NHF reported that whilst the average for England was £303,006 in Cheltenham the average house price was £332,953.

Lower Quartile House Prices in Cheltenham Borough

- 6.22 For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to incomes stood at 8.94 in 2020, a 20% increase since the start of the JCS period in 2011 where it stood at 7.44.
- 6.23 This means that those on the lowest incomes in the Borough seeking to purchase a home in the lower end of the property market now need to find more than eight times their annual income to do so.

House Prices in Battledown Ward

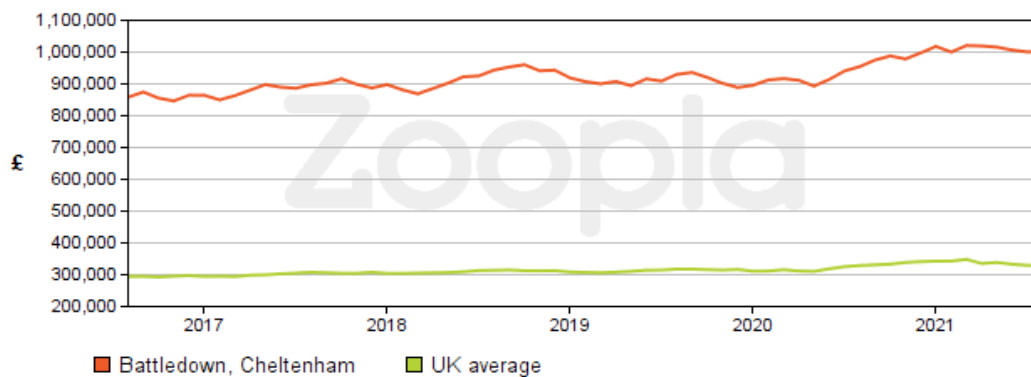
- 6.24 Data taken from Zoopla indicates that the average price paid for a home in Battledown Ward over the past 12 months¹⁷ was £378,000.
- 6.25 Figure 6.4 illustrates that average home prices in Battledown Ward have consistently far outstripped the UK average.

¹⁵ Based on 3.5 x income multiples

¹⁶ Based on Valuation Office Agency data

¹⁷ Accessed 5 August 2021

Figure 6.4: Average Home Prices in Battledown Ward Compared to UK Average

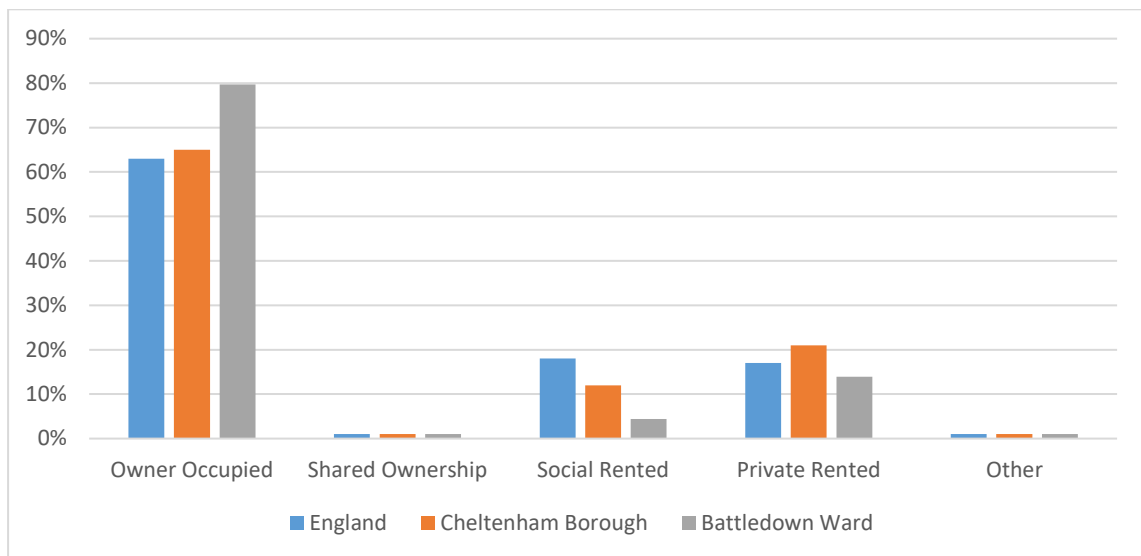


Source: <https://www.zoopla.co.uk/market/battledown/?q=Battledown%20ward> [accessed 5 August 2021]

Tenure Profile in Cheltenham Borough and Battledown Ward

- 6.26 Figure 6.5 illustrates the breakdown of tenures within Cheltenham Borough and Battledown Ward compared with the tenure breakdown nationally at the time of the 2011 Census. Owner occupation by far represents the largest tenure typology within the Borough with 65% of households owned outright or with a mortgage which exceeds the national average.
- 6.27 By comparison only 12% of households in Cheltenham were social rent/affordable rent, which is lower than the national average by 6%, whilst less than 1% of the households in the Borough were shared ownership tenure properties. The picture in Battledown Ward was even worse, with just 5% of tenures being affordable products (considerably below both the national and the Borough average) and some 80% of households being homeowners which far exceeds both the national (63%) and the Borough (65%) average.
- 6.28 This means the prospect of households having their housing needs met in Battledown Ward is exceedingly low, especially when the level of relets averages just two a year.

Figure 6.5: Tenure Breakdown for England, Cheltenham Borough and Battledown Ward



Source: 2011 Census

- 6.29 The data shows that by comparison to the national average, there are a larger percentage of owner occupiers in Cheltenham and an even higher proportion in Battledown Ward and lower proportions of social housing tenures available.
- 6.30 The evidence indicates that the situation for those in need of an affordable home in Cheltenham Borough is poor and is worsening.
- 6.31 The importance of the analysis of such data was acknowledged in Inspectors Drew appeal decision concerning Cornerways, Twyning in Tewkesbury (CD K4) where in considering affordable housing provision through the appeal scheme, he stated that:
- 6.32 *“The significance of this scheme in meeting the needs of different groups in the Borough, as required by paragraph 50 of the Framework, is underlined by the stark figure that this scheme alone would result in a 100% increase in shared ownership properties in the Parish of Twyning, as well as a 27% increase in social rented properties. Those figures are a powerful illustration of the extent to which the proposed development would contribute to creating a more mixed and balanced community, which is a key Government objective”* (paragraph 65).

Conclusions on Affordability Indicators in Cheltenham

- 6.33 As demonstrated through the analysis in this section, affordability in the Borough has been and continues to be, in crisis. House prices and rent levels in both the average and lower quartile segments of the market are increasing whilst at the same time the

stock of affordable homes is decreasing. LHA rates for the Borough are insufficient to cover average private rents or lower quartile rents.

- 6.34 This only serves to push buying or renting in Cheltenham out of the reach of more and more people.
- 6.35 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Cheltenham Borough, with an average house price to average income ratio of 10.
- 6.36 The picture for those seeking to purchase a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market) is not much better with a lower quartile house price to income ratio of 8.94, meaning those on lower earnings would need to find more than eight their annual salary to purchase a lower price home.
- 6.37 The Borough's woeful record of affordable housing delivery and the failure to plan for a significant boost in the supply of affordable homes to meet identified needs are merely serving to further fuel the acute affordability crisis in Cheltenham.
- 6.38 Market signals indicate a worsening trend in affordability in Cheltenham and by any measure of affordability, this is a Borough in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 7

7.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing.

The Need for Affordable Housing

7.2 The National Housing Strategy sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.

7.3 The JCS does not define a numerical target for the provision of affordable homes in Cheltenham Borough, instead it requires that in Cheltenham 40% of homes are provided as affordable tenures from qualifying developments.

7.4 In the absence of a defined affordable housing target in adopted policy, it is important to consider the objectively assessed need for affordable housing within the most up-to-date SHMA. Notably the reasoned justification to Policy SD12 of the JCS cross-references the identified needs of the 2015 SHMA Update.

7.5 The 2015 SHMA Update identifies a need for 213 net affordable homes per annum in the Borough between 2015 and 2031 when the Liverpool approach to addressing backlog is applied.

7.6 The Gloucestershire Local Housing Needs Assessment (LHNA) published in September 2020 finds a minimum net annual need of 194¹⁸ affordable homes per annum over the 20-year period between 2021 and 2041 for the Cheltenham Borough Council area.

7.7 Against either estimate of need, this is a Borough which has overseen an average delivery rate of just 44 affordable homes per annum over the course of the past nine years, which helps to illustrate the sheer scale of the affordable housing crisis engulfing

¹⁸ Figures do not sum due to rounding – $3,874 / 20 = 193.7$

Cheltenham Borough. There has been an average rate of just 11% affordable housing delivery over the period.

- 7.8 When the Council's record of affordable housing delivery is compared with the needs identified in the SHMA then there has been a shortfall of -1,160 affordable homes since the base date in 2015/16.
- 7.9 It is my view that backlog needs should be addressed within the first five years in line with the Sedgefield approach. This would ensure that the same approach to addressing backlog needs is applied for both market and affordable housing and is an approach which has been endorsed at appeal (**CD K11**).
- 7.10 When the Sedgefield approach is applied to address the backlog of -1,160 affordable homes within the next five years, then this results in a need for 463 net affordable homes per annum between 2021/22 to 2025/26.
- 7.11 For the sake of clarity, the Council has overseen the delivery an annual average of just 38 net affordable homes per annum over the six years since the base date of the 2015 SHMA Update in 2015/16. The challenge the Council faces in addressing affordable housing needs in the Borough is stark.
- 7.12 In addition to the shortfall in delivery against the affordable housing needs identified in the SHMA, other indicators further point to an affordability crisis in the Borough. This includes increasing house prices, a large number of households on the housing register and increasingly unaffordable private rents.
- 7.13 This demonstrates an acute need for affordable housing in Cheltenham and one which the Council and decision makers need to do as much as possible to seek to address. Indeed, they are required to do so, and proactively, by the NPPF (2021).

Cheltenham Borough Council's Assessment of the Application

- 7.14 The application was recommended for refusal by the Planning Officer in their report (**CD F5**). However, the appeal has been lodged on the grounds of "non-determination" following the failure of the Council to determine the application within the statutory 16 week period.
- 7.15 At paragraph 6.155 of the Officer's Report, the Officer recognises, "*The application proposes a policy compliant level of affordable housing (40%); included within the applicant's Draft Heads of Terms.*"
- 7.16 The Officer continues:

“To achieve a policy complaint scheme and in line with the latest Local Housing Needs Assessment (LHNA) the Council would seek a provision of 100 affordable homes for this development with a 70/30 tenure split between social rented and shared ownership/intermediate properties. Affordable housing provision would be secured via a s106 Agreement.” (Paragraph 6.157)

7.17 The appeal scheme proposes a tenure mix of 70/30 rented/shared ownership based on 38% affordable rented, 32% social rented, 30% shared ownership.

7.18 The Council reported the application to its Planning Committee on 20th May 2021, to request that Members confirm whether they would have refused planning permission had the Council still been the determining authority. The Planning Committee determined that the application would have been refused.

7.19 The Committee identified the seven putative reasons for refusal listed in the Officer’s Report. Reason number six states:

“Policy SD12 of the JCS seeks the provision of 40% affordable housing in developments of 11 or more dwellings within the Cheltenham Borough administrative area. Affordable housing requirements will be delivered by way of on and/or off site provision and secured through the s106 mechanism.”

7.20 Sub-point three of refusal reason number six elaborates:

“3. A need to provide for an element of affordable housing (Policy SD12 of the JCS and Policy CI1 of the Cheltenham Plan) which would be expected to be provided in full on site.

No agreement has been completed to secure the delivery of affordable housing requirements, and schemes/strategies for play space provision and site management and maintenance. The proposal therefore does not adequately provide for affordable housing requirements, schemes/strategies for play space provision and site management maintenance and conflicts with Policies SD11, SD12, INF3, INF4, INF6 and INF7 of the JCS, Policies CI1 and CI2 of the Cheltenham Plan (adopted 2020), Supplementary Planning Guidance – Playspace in Residential Development and the NPPF as referred to above.”

7.21 Since the refusal of the application, a legal agreement has been drawn up in order to secure the delivery of up to 100 affordable dwellings.

7.22 I do not consider that the Council sufficiently assessed the substantial benefits, such as affordable housing, that the scheme would achieve.

Weight to be Afforded to the Proposed Affordable Housing

- 7.23 The NPPF (2021) is clear at paragraph 31 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and takes into account relevant market signals.
- 7.24 Paragraph 60 of the NPPF (2021) sets out the Governments clear objective of “*significantly boosting the supply of homes*” with paragraph 61 setting out that in order to “*determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment*”. The NPPF (2021) requires local authorities at paragraph 61 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, “*including those who require affordable housing*”.
- 7.25 There has been a persistent under delivery of affordable homes to meet identified needs and demand in the Borough where since 2015 alone there has been a shortfall of some -1,160 affordable homes against identified needs taken from the 2015 SHMA Update.
- 7.26 The Borough’s track record of affordable housing delivery must also be viewed in the context of the fact that at 1 April 2021 there were 2,514 households on the Housing Register in need of an affordable home in Cheltenham, an increase of 16% from 1 April 2020 where it stood at 2,161 households.
- 7.27 There have been significant increases in waiting times in one year between 1 April 2020 and 1 April 2021 across all but one size of affordable accommodation in Cheltenham (refer to Figure 6.2). In addition, at 1 April 2021 there were nine households being housed in temporary accommodation within the Borough.
- 7.28 It is critically important that we do not lose sight of the fact that these are real people, who are in real housing need, now.
- 7.29 Cheltenham Borough Council’s poor past track record of affordable housing delivery and the concerning number of households on the housing register was recognised in May 2021 by Inspector Searson who presided over an appeal at Land adjacent to Oakhurst Rise, Cheltenham (**CD K6**), for which I presented affordable housing evidence.
- 7.30 Acknowledging my evidence and understanding that the policy compliant provision of affordable housing was secured through a unilateral undertaking, Inspector Searson

awarded the affordable housing benefits of the scheme **substantial weight** in the planning balance:

“Comprehensive and undisputed evidence has been provided in relation to affordable housing need across the country as well as on a Borough level and specifically for Charlton Kings. There is an accumulated shortfall of 1,015 affordable homes against the requirements of the 2015 SHMA and the need is acute. The contribution of 40% affordable housing at the site including social rented units, affordable rented units and shared ownership units of different sizes as guaranteed by the submitted UU. This is of substantial weight.” (Paragraph 141)

- 7.31 The appeal garnered numerous benefits including 40% affordable housing but was dismissed on 11 May 2021 as a result of heritage and ecology harms that were not outweighed by the public benefits.
- 7.32 The acute level of affordable housing need in Cheltenham will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.
- 7.33 Against the scale of need in the Borough and the Council’s affordable housing delivery track record, I therefore consider that the provision of 100 affordable homes on the appeal site should be afforded **substantial weight** in the determination of this appeal.
- 7.34 The weight to be applied to affordable housing in the planning balance is a matter for Mr Hutchinson to address in his planning evidence. I have set out my consideration of the degree of weight which I believe should be applied in the context of the acute need and the level of affordable housing that has been delivered in Cheltenham.

Relevant Secretary of State and Appeal Decisions

- 7.35 The importance of affordable housing as a material consideration has been reflected in a number of Secretary of State (SoS) and appeal decisions. Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations.
- 7.36 The importance of affordable housing as a material consideration has been reflected in a number of Secretary of State (SoS) and appeal decisions. Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations. Brief summaries are outlined below, and the full decisions are included as Core Documents.

Secretary of State Decision: Pulley Lane, Droitwich Spa (July 2014) – CD K8

7.37 The Inspector recognised that the contribution of the scheme in meeting some of the affordable housing deficit in the area cannot be underestimated (Inspector’s Report, Page 89). The Inspector set out under paragraph 8.122 of their Report that:

“The SOS should be aware that a major plank of the Appellant’s evidence is the significant under provision of affordable housing against the established need Figure and the urgent need to provide affordable housing in Wychavon. If the position in relation to the overall supply of housing demonstrate a general district-wide requirement for further housing, that requirement becomes critical and the need overriding in relation to the provision of affordable housing. The most recent analysis in the SHMA (found to be a sound assessment of affordable housing needs) demonstrates a desperate picture bearing hallmarks of overcrowding, barriers to getting onto the housing ladder and families in crisis.”

7.38 The Inspector continued under paragraph 8.123 of his report to state that *“the SHMA indisputably records that affordability is at crisis point. Without adequate provision of affordable housing, these acute housing needs will not be met. In terms of the NPPF’s requirement to create inclusive and mixed communities at paragraph 50, this is a very serious matter. Needless to say, these socially disadvantaged people were not represented at the Inquiry.”*

7.39 The level of significance attached to affordable housing provision was addressed through paragraph 8.124 of the Inspectors Report where he stated that:

“These bleak and desperate conclusions are thrown into even sharper focus by an examination of the current circumstances in Wychavon itself. Over the whole of the District’s area, there is presently a need for 268 homes per annum. These are real people in real need now. Unfortunately, there appears to be no early prospect of any resolution to this problem...Given the continuing shortfall in affordable housing within the District, I consider the provision of affordable housing as part of the proposed development is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission” (Inspectors Report, page 111).

7.40 This statement is supplemented at paragraph 8.125 by the Inspector considering that *“from all the evidence that is before me the provision of affordable housing must attract very significant weight in any proper exercise of planning balance.”*

7.41 The Secretary of State concluded that both schemes delivered *“substantial and tangible”* benefits, including the delivery of 40% *“much needed”* affordable housing.

Appeal Decision: Land North of Upper Chapel, Launceston (11 April 2014) – CD K9

- 7.42 At paragraph 51 the Inspector noted that *“irrespective of whether the five-year housing land supply figure is met or not, NPPF does not suggest that this has be regarded as a ceiling or upper limit on permissions. On the basis that there would be no harm from a scheme, or that the benefits would demonstrably outweigh the harm, then the view that satisfying a 5 year housing land supply figure should represent some kind of limit or bar to further permissions is considerably diminished, if not rendered irrelevant”*.
- 7.43 The Inspector acknowledged at paragraph 41 that the appeal proposal would have a very significant social role in bringing forward 40 affordable housing units, noting that there was an acute shortage of affordable housing in Launceston. The Inspector also noted that the need for additional affordable housing was all the greater having regard to other sites negotiating lower proportions of affordable housing in lieu of other planning obligation contributions.
- 7.44 At paragraph 52 of their report, the Inspector considered that *“there is an acknowledged acute need for affordable housing in this locality and the proposed scheme would bring forward 40 affordable units. This has to be a substantial benefit of the scheme.”* (my emphasis). In concluding the Inspector found that the benefits of the proposals outweighed the small degree of policy conflict.

Appeal Decision: Oldmixon Road, Weston-super-Mare (10 April 2017) – CD K10

- 7.45 The appeal proposals made provision for 150 dwellings of which 30% (45 dwellings) would be provided as affordable housing. Paragraph 92 of the Inspectors report acknowledged that the Sustainable Community Strategy *“recognises that one of the main challenges is the growing number of people seeking social housing in the area”* and that *“it is apparent that the need for more affordable housing in North Somerset has been, and continues to be, an issue of concern.”*
- 7.46 The Inspector went on at paragraph 94 to note the 3,608 households on the Housing Register at 1 April 2016 with paragraph 95 referring to the fact that the average waiting time for an affordable home in North Somerset was 735 days. In addition to which reference was drawn to the 34% increase in homelessness, high levels of affordability ratios and 32% house price increase over the past five years. Following on from this at paragraph 96 he found that *“the need in the district is glaring with a significant number of people having bleak housing prospects for the foreseeable future”*.

7.47 Furthermore, the Inspector made clear at paragraph 97 that *“although the Council sought to undermine the veracity of the affordable housing obligation, in the absence of a viability appraisal, nothing of any substance was placed before me. It is also telling that the appellant has not considered the 30% contribution to be unrealistic on the grounds of lack of viability”*.

7.48 Paragraph 101 set out that the Inspector *“remain[ed] content to afford substantial weight to the benefit arising from the market and affordable homes which the scheme would deliver”*.

Appeal Decision: Land east of Park Lane, Coalpit Heath, South Gloucestershire (September 2018) – CD K5

7.49 Paragraph 61 of the decision states that *“there are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing (CBH). They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply”* (my emphasis)

Overview of Secretary of State and Appeal Decisions

7.50 The decisions above emphasise the great weight which both Inspectors and the Secretary of State have, on various occasions, attached to the provision of affordable housing in the consideration of planning appeals.

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

- Affordable housing is an important material consideration;
- The importance of unmet need for affordable housing being met immediately;
- Planning Inspectors and the Secretary of State has attached **substantial weight** to the provision of affordable housing; and
- Even where there is a five-year housing land supply the benefit of a scheme’s provision of affordable housing can weigh heavily in favour of development.

Conclusions on Weight to be attributed to the Proposed Affordable Housing Provision

- 7.52 JCS Policy SD12 does not define a numerical target for the provision of affordable homes, instead it requires that 40% of dwellings are provided as affordable homes from qualifying development in Cheltenham.
- 7.53 The reasoned justification to the policy draws reference to the need for 638 affordable homes per annum across the JCS which is taken from the 2015 SHMA Update. Within this SHMA Update need figure for the JCS there is an identified need for 231 affordable homes per annum in Cheltenham Borough between 2015/16 and 2031/32.
- 7.54 In the nine-year period since the start of the JCS period in 2011/12, there have been just 394 net affordable housing additions to stock, equivalent to an average of just 44 per annum and representing an astonishingly low 11% of overall net housing additions over the same period.
- 7.55 When the 226 net affordable housing additions to stock since 2015/16 are compared with the 2015 SHMA Update need figure of 231 per annum over the same period, there has been a shortfall in delivery of -1,160 affordable homes compared to identified needs.
- 7.56 If this backlog were to be addressed within five years in line with the Sedgefield approach, then there would need to be 463 affordable homes per annum delivered between 2021/22 to 2025/26.
- 7.57 There were 2,514 households on the Council's Housing Register at 1 April 2021 with an identified need for an affordable home in Cheltenham. This figure has risen by 16% in just one year from where it previously stood at 2,161 at 1 April 2020. There is no specific local preference data available for Battledown Ward. However, local preference data is available for the adjoining ward of Charlton Kings which shows there are 551 households with a local need. This demonstrates that there is significant local need for affordable properties in the general area of the appeal site.
- 7.58 It is critically important that we do not lose sight of the fact that these are real people, who are in real housing need, now. In my opinion there is a substantial need for new affordable homes in Cheltenham and Battledown Ward.
- 7.59 The appeal proposals provide 40% affordable housing which meets the requirements of JCS Policy SD12, equivalent to 100 affordable dwellings. It is my view that this will make a substantial contribution to meeting the identified needs in Cheltenham.

- 7.60 Given the Council's performance towards meeting its identified housing needs across the Borough, I consider that **substantial weight** should be afforded to the delivery of affordable housing in the determination of this appeal.
- 7.61 As discussed above at paragraphs 7.30 to 7.32 of this proof, as recently as May 2021, substantial weight was awarded to the affordable housing benefits presented at an appeal at Land adjacent to Oakhurst Rise, Cheltenham, by Inspector Searson.
- 7.62 The weight to be applied to affordable housing in the planning balance is a matter for Mr Hutchinson to address in his planning evidence. I have set out my consideration of the weight which I believe should be applied in the context of the acute need and the poor level of affordable housing that has been delivered in Cheltenham.

Summary and Conclusions

Section 8

- 8.1 My Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in the planning decision in light of the evidence of need in the area.
- 8.2 Britain is in the midst of an undisputed housing crisis with unaffordable housing one of the biggest challenges for the South West with low and stagnating wages combined with drastically rising house prices making it one of the most unaffordable regions in the country¹⁹. The National Housing Strategy states that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 8.3 The NPPF (2021) sets out the Governments clear objective of *“significantly boosting the supply of homes”*.
- 8.4 Locally, providing housing is a key issue as acknowledged by the foreword to the Housing and Homelessness Strategy by Councillor Pete Jeffries, Deputy Leader of the Council and Cabinet Member for Housing, who stated that *“everyone should have the right to a decent affordable home; this is something I passionately believe. At present Cheltenham doesn’t have all the homes that local people need”*.
- 8.5 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 8.6 In this context, it is important to consider that the NHF report that the average house price in the Borough now stands at £332,953, which exceeds the national average. The average house price to average income ratio in the Borough sits at 10. For those seeking a lower quartile priced property the situation is not much better with a lower quartile house price to income ratio of 8.94.
- 8.7 JCS Policy SD12 does not identify a defined affordable housing numerical target, though the reasoned justification to the policy does cross refer to the affordable housing need figure identified in the 2015 SHMA Update. In the absence of which

¹⁹ NHF Home Truths South West 2019/20

consideration must be given to the objectively assessed need for affordable housing within the most up-to-date SHMA.

- 8.8 The 2015 SHMA update identifies a net annual need of 231 affordable dwellings between 2015/16 and 2031/32 in Cheltenham.
- 8.9 The 2020 Gloucestershire LHNA found a minimum net annual need of 194 affordable homes per annum over the 20-year period between 2021 and 2041 for the Cheltenham Borough Council area. This figure increases by 52% to 295 dwellings per annum over the period when those in receipt of housing benefit within the PRS are factored into the calculation.
- 8.10 Since the base period of the 2015 SHMA update in 2015/16, the Borough have overseen the delivery of a total of 226 net affordable homes, equivalent to an average of just 38 per annum over this period. This has resulted in a shortfall of -1,160 affordable homes when compared with the identified need for 1,386 net affordable homes over the same period.
- 8.11 When the Sedgefield approach is applied in seeking to address the backlog in delivery of affordable homes which has accrued since 2015/16 compared with identified needs taken from the 2015 SHMA Update, there would be a need for 463 net affordable homes per annum for the five years period between 2021/22 and 2025/26 across the Borough.
- 8.12 In the nine-year period since the start of the JCS period in 2011/12, there have been just 394 net affordable housing additions to stock, equivalent to an average of just 44 per annum and representing an astonishingly low 11% of overall net housing additions over the same period.
- 8.13 When viewed in this context, the stark challenge that the Borough faces becomes clear and a monumental step change in the delivery of affordable housing is required. Given the persistent under delivery of affordable housing delivery in the Borough there appears to be little prospect of the backlog affordable housing needs being met without a substantial boost in the delivery of affordable housing.
- 8.14 The 100 affordable homes that the appeal proposal would provide represents the equivalent of 44% of the total number of affordable homes delivered across the entire Borough since the SHMA base period in 2015/16. It is evident that the appeal site can help to make a substantial contribution towards addressing the acute affordable housing needs of Cheltenham.

- 8.15 It is critical to view this appeal in the context of the 2,514 households on the Borough's Housing Register at 1 April 2021 and it is important not to lose sight of the fact that these are real people, who are in real need, now.
- 8.16 The lack of affordable homes is fuelling the Boroughs persistent homelessness issue. By the Borough's own admission in its Housing and Homelessness Strategy private rental rates in Cheltenham has increased significantly in recent years and *"by far the main cause of homelessness in Cheltenham is loss of private rented accommodation"*
- 8.17 The evidence demonstrates that private market rents are increasingly unaffordable in the Borough, even with LHA support there are shortfalls in monthly rental costs ranging from -£88 to -£307 for average rental prices, to shortfalls of -£5 to -£137 for lower quartile rental properties which are typically considered to be the 'more affordable' segment of the rental market. For those in need of an affordable home in Cheltenham, the private rental market fails to provide an appropriate alternative to genuinely affordable homes.
- 8.18 Existing stock in the Borough is dominated by owner occupiers. By comparison to the national average, there are a larger percentage of owner occupiers in Cheltenham and a lower proportion of rented tenures available. Within Battledown Ward, the proportion of owner occupiers exceeds both the Borough and the national average, whilst the proportion of social tenures at just 5% is particularly low in comparison to the national average of 19% and Borough average of 13%.
- 8.19 The future supply of affordable homes in Cheltenham is highly uncertain. Past delivery has fluctuated considerably and the delivery of a higher number of affordable homes one year does not guarantee this will continue for future years.
- 8.20 The acute level of affordable housing need coupled with worsening affordability will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.
- 8.21 The appeal proposals would make a substantial contribution towards broadening the type and mix of dwellings in the Borough, including the provision of 100 much needed affordable homes.
- 8.22 Since 1969 there has been an accumulated shortfall of housing in excess of 5.5 million new homes. Furthermore, on a national level, in every scenario, against every annual need figure identified since the publication of the Barker Review in 2004, the extent of the shortfall in housing delivery in England is staggering and ranges from a shortfall of

-1,105,490 to a shortfall of -2,635,490 over the past 17 years depending on which annual target actual housing completions are measured against. This merely serves to further compound the acute affordability problems that the country is facing.

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

8.24 Against the scale unmet need and the lack of suitable alternatives in the private rented sector in Cheltenham Borough, there is no doubt in my mind that the provision of 100 affordable homes will make a substantial contribution. In light of all the evidence I consider that it should be afforded **substantial weight** in the determination of this appeal.

Appendix 1

Freedom of Information Correspondence
(24 and 30 June, 9, 19 and 30 July and 4, 6 August 2021)



Dear Sir/Madam,

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

Housing Register

1. The total number of households on the Council's Housing Register at 1st April 2021.
2. The total number of households on the Council's Housing Register at 1st April 2021 specifying the Charlton Kings Civil Parish as their preferred choice of location.
3. The average number of bids per property in Charlton Kings Civil Parish over the 2020/21 monitoring period for the following types of affordable property:
 - a. A shared accommodation affordable dwelling;
 - b. 1-bed affordable dwelling;
 - c. 2-bed affordable dwelling;
 - d. 3-bed affordable dwelling;
 - e. 4-bed affordable dwelling; and
 - f. A 4+ bed affordable dwelling.
4. The average waiting times at 1 April 2021 for the following types of affordable property:
 - g. A shared accommodation affordable dwelling;
 - h. 1-bed affordable dwelling;
 - i. 2-bed affordable dwelling;
 - j. 3-bed affordable dwelling;
 - k. 4-bed affordable dwelling; and
 - l. A 4+ bed affordable dwelling.
5. The average waiting times at 1 April 2020 for the following types of affordable property:
 - a. A shared accommodation affordable dwelling;
 - b. 1-bed affordable dwelling;
 - c. 2-bed affordable dwelling;
 - d. 3-bed affordable dwelling;
 - e. 4-bed affordable dwelling; and
 - f. A 4+ bed affordable dwelling.
6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:
 - a. The date they occurred;
 - b. What they entailed; and
 - c. Copies of the respective documents

Social Housing Stock

7. The total number of social housing dwelling stock at 1st April 2021 in Charlton Kings Civil Parish.
8. Whether all, or a part of, the Local Authority's social housing dwelling stock as been transferred to another organisation(s). If so, when did this occur and to whom (i.e. which housing association(s) or Arms-Length Management Organisation (ALMO)) was the stock transferred.

Social Housing Lettings

9. The number of social housing lettings in the period between 1 April 2019 and 31 March 2020; and between 1 April 2020 and 31 March 2021 in Charlton Kings Civil Parish.

Housing Completions

10. The number of NET housing completions in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.
11. The number of NET affordable housing completions in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.
12. The number of NET housing completions in Charlton Kings Civil Parish broken down on a per annum basis for the period between 2000/01 and 2020/21.
13. The number of NET affordable housing completions in Charlton Kings Civil Parish broken down on a per annum basis for the period between 2000/01 and 2020/21.

Right to Buy

14. The number of social rented dwellings lost in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21 through:
 - a. Right to Buy;
 - b. Preserved Right to Buy; and
 - c. Voluntary Right to Buy
15. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.
16. The number of social rented dwellings lost in the Charlton Kings Civil Parish broken down on a per annum basis for the period between 2000/01 and 2020/21 through:
 - a. Right to Buy;

- b. Preserved Right to Buy; and
- c. Voluntary Right to Buy

17. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Charlton Kings Civil Parish broken down on a per annum basis for the period between 2000/01 and 2020/21.

Temporary Accommodation

18. The number of households on the Housing Register housed in temporary accommodation within the Cheltenham Borough Council region at 1st April 2021.

19. The number of households on the Housing Register housed in temporary accommodation outside the Cheltenham Borough Council region at 1st April 2021.

20. The number of households on the Housing Register housed in temporary accommodation within the Cheltenham Borough Council region at 1st April 2020.

21. The number of households on the Housing Register housed in temporary accommodation outside the Cheltenham Borough Council region at 1st April 2020.

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

Gina Day

From: Internet-CustomerRelations@cheltenham.gov.uk
Sent: 25 June 2021 10:45
To: Leonie Stoate
Subject: RE: Freedom of information - Housing data

Dear Ms Stoate,

Thank you for your enquiry received 24/06/21. Your request for information has been logged with the reference 8151 and you will receive a response within 20 working days.

Kind regards,

Charlotte Gayton
Customer Services Officer
Cheltenham Borough Council
Tel: 01242 264350

Email: customerrelations@cheltenham.gov.uk

Website: <http://www.cheltenham.gov.uk>

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From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Sent: 24 June 2021 16:17
To: Internet - Customer Relations <Internet-CustomerRelations@cheltenham.gov.uk>
Cc: James Stacey <James.Stacey@tetlow-king.co.uk>
Subject: Freedom of information - Housing data

Good afternoon,

Please find the attached freedom of information request.

I look forward to hearing from you.

Kind regards,

Leonie Stoate BSc (Hons) MSc
Planner

TETLOW KING PLANNING

Please read our statement on COVID-19 [here](#)



Unit 2, Eclipse Office Park, High Street,
Staple Hill, Bristol, BS16 5EL

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Gina Day

From: Internet-CustomerRelations@cheltenham.gov.uk
Sent: 30 July 2021 09:10
To: Leonie Stoate
Subject: RE: FOI Request- Reference 8151- Housing Data.
Attachments: FOI 8151.docx

Dear Ms Stoate,

The information the council holds in relation to your request for information is attached.

Please note: If you are dissatisfied with the Council's response you have a right of appeal. In the first instance please forward your appeal to Customer Relations, Cheltenham Borough Council, Municipal Offices, Promenade, Cheltenham, GL50 9SA or email: customerrelations@cheltenham.gov.uk. Your appeal will be considered and a response sent to you within 20 working days.

If you are still not happy with any decision following any review you have a further right of appeal to the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Kind regards,

Beth Cordingley (Mrs)
Customer Relations and Information Officer
Cheltenham Borough Council
Tel: 01242 264350
Email: customerrelations@cheltenham.gov.uk
Website: <http://www.cheltenham.gov.uk>

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From: Internet - Customer Relations
Sent: 19 July 2021 12:17
To: 'Leonie Stoate' <Leonie.Stoate@tetlow-king.co.uk>
Cc: adam.waller@cbh.org; Ewan Wright <Ewan.Wright@cheltenham.gov.uk>
Subject: RE: FOI Request- Reference 8151- Housing Data.

Dear Ms Stoate,

Thank you for your email. I can confirm that we have received your clarification. The new response deadline for providing the councils response is 29/07/21.

Many thanks,

Beth Cordingley (Mrs)
Customer Relations and Information Officer
Cheltenham Borough Council
Tel: 01242 264350
Email: customerrelations@cheltenham.gov.uk
Website: <http://www.cheltenham.gov.uk>

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From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Sent: 19 July 2021 12:03
To: Ewan Wright <Ewan.Wright@cheltenham.gov.uk>

Cc: adam.waller@cbh.org; Internet - Customer Relations <Internet-CustomerRelations@cheltenham.gov.uk>
Subject: RE: FOI Request- Reference 8151- Housing Data.

Some people who received this message don't often get email from leonie.stoate@tetlow-king.co.uk. [Learn why this is important](#)

Hi Ewan,

Please could you confirm that you have received my response below and update me with the new deadline for the Council's FOI response.

Kind regards,

Leonie Stoate BSc (Hons) MSc
Planner
TETLOW KING PLANNING



T: 0117 9561916 **M:** 07517 106104 **W:** tetlow-king.co.uk

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From: Leonie Stoate
Sent: 09 July 2021 12:21
To: Ewan.Wright@cheltenham.gov.uk
Cc: adam.waller@cbh.org; Internet-CustomerRelations@cheltenham.gov.uk
Subject: RE: FOI Request- Reference 8151- Housing Data.

Good afternoon Ewan,

Thank you for bringing this to my attention. If you are only able to provide the data for questions 3, 7, 10, 13, 14, 17 and 18 on a ward basis, then please may we receive data based on the Battledown Ward boundary for those questions please?

Kind regards,

Leonie Stoate BSc (Hons) MSc
Planner
TETLOW KING PLANNING



T: 0117 9561916 **M:** 07517 106104 **W:** tetlow-king.co.uk

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From: Ewan.Wright@cheltenham.gov.uk <Ewan.Wright@cheltenham.gov.uk>
Sent: 30 June 2021 15:38
To: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Cc: adam.waller@cbh.org; Internet-CustomerRelations@cheltenham.gov.uk
Subject: RE: FOI Request- Reference 8151- Housing Data.
Importance: High

Good Afternoon Leonie,

I have been working on your FOI Request regarding Housing Data, FOI reference number 8151.

I have discussed the finer points of FOI 8151 with Adam Waller at CBH, who I am working with to collate the information you have requested. We have a point clarification to ask, to ensure you receive the most accurate information possible:

- In relation to Questions 3, 7, 10, 13, 14, 17 and 18, our Housing Register database is only able to gauge need on a Ward, rather than a Parish level. As you may be aware, the Charlton Kings Parish encompasses areas of Ewen's Farm, Charlton Kings and Battledown, however, there is no direct correlation between the Parish and ward boundaries respectively. *In this vein, would you be happy to accept the figures arising from the Questions mentioned above based upon the Charlton Kings ward boundary, rather than based on a Parish level??*

I look forwards to hearing from you soon,

Kind regards,

Ewan.

Ewan Wright

Housing Strategy and Enabling Officer

Cheltenham Borough Council

Municipal Offices

The Promenade

Cheltenham

GL50 1PN

Tel: 01242 264325/07444533415

ewan.wright@cheltenham.gov.uk

website: <http://www.cheltenham.gov.uk>

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Dear Sir/Madam,

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

Housing Register –

1. The total number of households on the Council's Housing Register at 1st April 2021.

Answer: 2514 households

2. The total number of households on the Council's Housing Register at 1st April 2021 specifying the Charlton Kings Ward as their preferred choice of location.

Answer: Applicants provide three preferred choices of location. The number of applicants that included Charlton Kings Ward as their preferred choice of location was 551.

3. The average number of bids per property in Charlton Kings Ward over the 2020/21 monitoring period for the following types of affordable property:
 - a. A shared accommodation affordable dwelling;
 - b. 1-bed affordable dwelling;
 - c. 2-bed affordable dwelling;
 - d. 3-bed affordable dwelling;
 - e. 4-bed affordable dwelling; and
 - f. A 4+ bed affordable dwelling.

Answer: We do not categorise this information in the requested way, though please see the below table that provides the number of bids per property in Charlton Kings Ward over the 2020/21 monitoring period. The property with 0 bedrooms is a bedsit and the below table demonstrates the 13 properties within Charlton Kings Ward and the number of bids each property received.

Bids	Bedrooms	
152	Cheltenham - Charlton Kings	3
14	Cheltenham - Charlton Kings	1
260	Cheltenham - Charlton Kings	2
75	Cheltenham - Charlton Kings	2
56	Cheltenham - Charlton Kings	2
12	Cheltenham - Charlton Kings	1
10	Cheltenham - Charlton Kings	0
7	Cheltenham - Charlton Kings	1
41	Cheltenham - Charlton Kings	2
8	Cheltenham - Charlton Kings	1
18	Cheltenham - Charlton Kings	1
10	Cheltenham - Charlton Kings	1
1	Cheltenham - Charlton Kings	2

4. The average waiting times at 1 April 2021 for the following types of affordable property:

- g. A shared accommodation affordable dwelling;
- h. 1-bed affordable dwelling;
- i. 2-bed affordable dwelling;
- j. 3-bed affordable dwelling;
- k. 4-bed affordable dwelling; and
- l. A 4+ bed affordable dwelling.

Answer: please see the below table

Accommodation Type	Average wait
Sheltered accommodation	9 months
Studio general needs	22 months
1-bed general needs	8 months
2-bed flat or maisonette	7 months
2-bed house	20 months
3-bed flat or maisonette	15 months
3-bed house	20 months
4-bed	16 months
5-bed	N/A

5. The average waiting times at 1 April 2020 for the following types of affordable property:

- a. A shared accommodation affordable dwelling;
- b. 1-bed affordable dwelling;
- c. 2-bed affordable dwelling;
- d. 3-bed affordable dwelling;
- e. 4-bed affordable dwelling; and
- f. A 4+ bed affordable dwelling.

Answer: please see the below table

Accommodation type	Average wait
Studio general needs	11 weeks
1-bed general needs	11 months
2-bed flat or maisonette	5 months
2-bed house	11 months
3-bed flat or maisonette	8 months
3-bed house	15 months
4-bed	10 months
5-bed	11 months

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:
- a. The date they occurred;
 - b. What they entailed; and
 - c. Copies of the respective documents

Answer: CBC are part of countywide CBL scheme and a copy of the policy can be found at www.homeseeckerplus.co.uk .

Social Housing Stock

7. The total number of social housing dwelling stock at 1st April 2021 in Charlton Kings Ward.

Answer: 40

8. Whether all, or a part of, the Local Authority's social housing dwelling stock as been transferred to another organisation(s). If so, when did this occur and to whom (i.e. which housing association(s) or Arms-Length Management Organisation (ALMO)) was the stock transferred.

Answer: all the Local Authority's social housing dwelling stock was transferred to the management of Cheltenham Borough Homes Ltd. in 2003. Cheltenham Borough Homes are an Arms-Length Management Organisation with responsibility for the management and maintenance of Cheltenham Borough Council's (CBC) and our own housing stock.

Social Housing Lettings –

9. The number of social housing lettings in the period between 1 April 2019 and 31 March 2020; and between 1 April 2020 and 31 March 2021 in Charlton Kings Ward.

Answer: 8

Housing Completions

10. The number of NET housing completions in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer: Please see the table below. It should be noted that the forecasting for the 2020/21 financial year has yet to be completed.

Year	Net
2000	409

2001	417
2002	418
2003/04	559
2004/05	590
2005/06	452
2006/07	926
2007/08	558
2008/09	280
2009/10	275
2010/11	136
2011/12	36
2012/13	266
2013/14	413
2014/15	316
2015/16	397
2016/17	296
2017/18	594
2018/19	776
2019/20	476
2020/21	
Total	8,590

11. The number of NET affordable housing completions in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer: Please see the table below.

Financial Year	NET affordable housing completions
2000/01	-128
2001/02	-119
2002/03	-49
2003/04	45
2004/05	23
2005/06	-7
2006/07	-18
2007/08	77
2008/09	42
2009/10	-62
2010/11	20
2011/12	8

2012/13	88
2013/14	119
2014/15	15
2015/16	-17
2016/17	-11
2017/18	85
2018/19	53
2019/20	54
2020/21	62
TOTAL	280

12. The number of NET housing completions in Charlton Kings Ward broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer: See table below. Note that the way residential monitoring was handled changed in 2003 to match financial years and not calendar years. Also, monitoring has always been done on a ward basis, not a Parish basis. The wards were changed in 2002 and no information seems to be available on which wards were in CK Parish pre-2002, so only net completions in CK ward have been included for 2000 and 2001, marked with an asterisk (*). Monitoring for the 2020/21 financial year is yet to be completed.

Year	Net
2000	16*
2001	19*
2002	8
2003/04	27
2004/05	13
2005/06	39
2006/07	26
2007/08	21
2008/09	9
2009/10	20
2010/11	4
2011/12	18
2012/13	11
2013/14	3
2014/15	13
2015/16	34
2016/17	1
2017/18	7
2018/19	3
2019/20	50
2020/21	
Total	342

13. The number of NET affordable housing completions in Charlton Kings Ward broken down on a per annum basis for the period between 2000/01 and 2020/21.

Financial Year	NET affordable housing completions
2000/01	6
2001/02	0
2002/03	0
2003/04	0
2004/05	0
2005/06	0
2006/07	-1
2007/08	0
2008/09	0
2009/10	0
2010/11	0
2011/12	0
2012/13	0
2013/14	-3
2014/15	-2
2015/16	-2
2016/17	-2
2017/18	0
2018/19	-1
2019/20	2
2020/21	1
Total	-2

Right to Buy –

14. The number of social rented dwellings lost in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21 through:

- a. Right to Buy;

Answer:

2000/1	91
2001/2	103
2002/3	101
2003/4	104
2004/5	82
2005/6	34
2006/7	22
2007/8	13
2008/9	1

2009/10	3
2010/11	5
2011/12	7
2012/13	13
2013/14	28
2014/15	13
2015/16	22
2016/17	28
2017/18	26
2018/19	21
2019/20	20
2020/21	15
total	752

- b. Preserved Right to Buy; and - N/A
- c. Voluntary Right to Buy - N/A

15. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer:

2015/16	2
2016/17	24
2017/18	10
2018/19	17
2019/20	27
2020/21	26
Total	106

16. The number of social rented dwellings lost in the Charlton Kings Ward broken down on a per annum basis for the period between 2000/01 and 2020/21 through:

- a. Right to Buy;

Answer:

2000/1	3
2001/2	3

2002/3	1
2003/4	7
2004/5	2
2005/6	0
2006/7	1
2007/8	0
2008/9	0
2009/10	0
2010/11	0
2011/12	0
2012/13	0
2013/14	3
2014/15	1
2015/16	2
2016/17	2
2017/18	0
2018/19	1
2019/20	0
2020/21	2
total	28

b. Preserved Right to Buy; and – N/A

c. Voluntary Right to Buy – N/A

17. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Charlton Kings Ward broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer:

2011/12	0
2012/13	0
2013/14	0
2014/15	0
2015/16	0
2016/17	0
2017/18	2
2018/19	0
2019/20	2
2020/21	4

total	8
-------	---

Temporary Accommodation –

18. The number of households on the Housing Register housed in temporary accommodation within the Cheltenham Borough Council region at 1st April 2021.

Answer: Nine

19. The number of households on the Housing Register housed in temporary accommodation outside the Cheltenham Borough Council region at 1st April 2021.

Answer: None

20. The number of households on the Housing Register housed in temporary accommodation within the Cheltenham Borough Council region at 1st April 2020.

Answer: Seventeen

21. The number of households on the Housing Register housed in temporary accommodation outside the Cheltenham Borough Council region at 1st April 2020.

Answer: None

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

Gina Day

To: Internet-CustomerRelations@cheltenham.gov.uk
Subject: RE: FOI Request- Reference 8151- Housing Data.

From: Internet-CustomerRelations@cheltenham.gov.uk <Internet-CustomerRelations@cheltenham.gov.uk>
Sent: 06 August 2021 09:56
To: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Subject: RE: FOI Request- Reference 8151- Housing Data.

Dear Ms Stoate,

Please accept my apologies; I was hoping to be able to come back to you yesterday afternoon. Please find the updated response to your FOI request attached.

Kind Regards,

Beth Cordingley (Mrs)
Customer Relations and Information Officer Cheltenham Borough Council
Tel: 01242 264350
Email: customerrelations@cheltenham.gov.uk <mailto:customerrelations@cheltenham.gov.uk>
Website: <http://www.cheltenham.gov.uk> <<http://www.cheltenham.gov.uk>>

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From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk <mailto:Leonie.Stoate@tetlow-king.co.uk> >
Sent: 05 August 2021 17:57
To: Internet - Customer Relations <Internet-CustomerRelations@cheltenham.gov.uk <mailto:Internet-CustomerRelations@cheltenham.gov.uk> >
Subject: RE: FOI Request- Reference 8151- Housing Data.

Good afternoon,

I note that the remainder of this FOI response is now a full week overdue.

I am in need of this data by midday tomorrow. An update on the situation would be appreciated.

Kind regards,

Leonie Stoate BSc (Hons) MSc
<<http://www.tetlow-king.co.uk/>> .
Planner
TETLOW KING PLANNING

T: 0117 9561916 M: 07517 106104 W: [tetlow-king.co.uk](http://www.tetlow-king.co.uk/) <<http://www.tetlow-king.co.uk/>>

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telephone, delete the transmission and destroy any hard copies. Tetlow King Planning Ltd has used all reasonable efforts to ensure that this message and any attachments are free from viruses.

From: Leonie Stoate
Sent: 04 August 2021 10:16
To: Internet-CustomerRelations@cheltenham.gov.uk <mailto:Internet-CustomerRelations@cheltenham.gov.uk>
Subject: RE: FOI Request- Reference 8151- Housing Data.

Good morning Beth,

Do you have an update on the Council's response?

Kind regards,

Leonie Stoate BSc (Hons) MSc
<<http://www.tetlow-king.co.uk/>> .
Planner
TETLOW KING PLANNING

T: 0117 9561916 M: 07517 106104 W: [tetlow-king.co.uk](http://www.tetlow-king.co.uk) <<http://www.tetlow-king.co.uk/>>

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From: Internet-CustomerRelations@cheltenham.gov.uk <mailto:Internet-CustomerRelations@cheltenham.gov.uk>
<Internet-CustomerRelations@cheltenham.gov.uk <mailto:Internet-CustomerRelations@cheltenham.gov.uk> >
Sent: 30 July 2021 12:03
To: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk <mailto:Leonie.Stoate@tetlow-king.co.uk> >
Subject: RE: FOI Request- Reference 8151- Housing Data.

Dear Ms Stoate,

Please except my apologise for this error, there seems to have been a miscommunication within the teams providing the information who thought there had been a second clarification reverting back to Charlton King. I am very sorry for this and the delay it will cause to providing you with the correct information. I have spoken to the relevant officers within CBC and CBH and discussed the need for a swift reply; we will come back to you with the requested information on Battledown as soon as possible.

Kind Regards,

Beth Cordingley (Mrs)
Customer Relations and Information Officer Cheltenham Borough Council
Tel: 01242 264350
Email: customerrelations@cheltenham.gov.uk <mailto:customerrelations@cheltenham.gov.uk>
Website: <http://www.cheltenham.gov.uk> <<http://www.cheltenham.gov.uk/>>

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From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk <mailto:Leonie.Stoate@tetlow-king.co.uk> >
Sent: 30 July 2021 11:25
To: Internet - Customer Relations <Internet-CustomerRelations@cheltenham.gov.uk <mailto:Internet-CustomerRelations@cheltenham.gov.uk> >
Subject: RE: FOI Request- Reference 8151- Housing Data.

Good morning,

Thank you for providing a response. However, the Council has incorrectly given the ward data for Charlton Kings Ward instead of Battledown Ward, as requested in my email below dated 19/07 following discussion with Ewan.

Please may the Council correctly re-issue the FOI with the data for Battledown Ward in response to questions 2, 3, 7, 9, 12, 13, 16 and 17 as soon as possible.

Kind regards,

Leonie Stoate BSc (Hons) MSc
<<http://www.tetlow-king.co.uk/>> .
Planner
TETLOW KING PLANNING

T: 0117 9561916 M: 07517 106104 W: [tetlow-king.co.uk](http://www.tetlow-king.co.uk) <<http://www.tetlow-king.co.uk/>>

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Dear Sir/Madam,

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

Housing Register –

1. The total number of households on the Council's Housing Register at 1st April 2021.

Answer: 2514 households

2. The total number of households on the Council's Housing Register at 1st April 2021 specifying the Battledown Ward as their preferred choice of location.

Answer: We do not hold information categorised in the requested way.

3. The average number of bids per property in Battledown Ward over the 2020/21 monitoring period for the following types of affordable property:

- a. A shared accommodation affordable dwelling;
- b. 1-bed affordable dwelling;
- c. 2-bed affordable dwelling;
- d. 3-bed affordable dwelling;
- e. 4-bed affordable dwelling; and
- f. A 4+ bed affordable dwelling.

Answer: We do not hold information categorised in the requested way.

4. The average waiting times at 1 April 2021 for the following types of affordable property:

- g. A shared accommodation affordable dwelling;
- h. 1-bed affordable dwelling;
- i. 2-bed affordable dwelling;
- j. 3-bed affordable dwelling;
- k. 4-bed affordable dwelling; and
- l. A 4+ bed affordable dwelling.

Answer: please see the below table

Accommodation Type	Average wait
Sheltered accommodation	9 months
Studio general needs	22 months
1-bed general needs	8 months
2-bed flat or maisonette	7 months
2-bed house	20 months

3-bed flat or maisonette	15 months
3-bed house	20 months
4-bed	16 months
5-bed	N/A

5. The average waiting times at 1 April 2020 for the following types of affordable property:

- a. A shared accommodation affordable dwelling;
- b. 1-bed affordable dwelling;
- c. 2-bed affordable dwelling;
- d. 3-bed affordable dwelling;
- e. 4-bed affordable dwelling; and
- f. A 4+ bed affordable dwelling.

Answer: please see the below table

Accommodation type	Average wait
Studio general needs	11 weeks
1-bed general needs	11 months
2-bed flat or maisonette	5 months
2-bed house	11 months
3-bed flat or maisonette	8 months
3-bed house	15 months
4-bed	10 months
5-bed	11 months

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- a. The date they occurred;
- b. What they entailed; and
- c. Copies of the respective documents

Answer: CBC are part of countywide CBL scheme and a copy of the policy can be found at www.homesekerplus.co.uk .

Social Housing Stock

7. The total number of social housing dwelling stock at 1st April 2021 in Battledown Ward

Answer: 40.

8. Whether all, or a part of, the Local Authority's social housing dwelling stock as been transferred to another organisation(s). If so, when did this occur and to whom (i.e. which housing association(s) or Arms-Length Management Organisation (ALMO)) was the stock transferred.

Answer: all the Local Authority's social housing dwelling stock was transferred to the management of Cheltenham Borough Homes Ltd. in 2003. Cheltenham Borough Homes are an Arms-Length Management Organisation with responsibility for the management and maintenance of Cheltenham Borough Council's (CBC) and our own housing stock.

Social Housing Lettings –

9. The number of social housing lettings in the period between 1 April 2019 and 31 March 2020; and between 1 April 2020 and 31 March 2021 in Battledown Ward

Answer: There were 3 lettings between 1 April 2019 and 31 March 2020 including 1 mutual exchange and, 0 lettings between 1 April 2020 and 31 March 2021.

Housing Completions-

10. The number of NET housing completions in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer: Please see the table below. It should be noted that the forecasting for the 2020/21 financial year has yet to be completed.

Year	Net
2000	409
2001	417
2002	418
2003/04	559
2004/05	590
2005/06	452
2006/07	926
2007/08	558
2008/09	280
2009/10	275
2010/11	136
2011/12	36
2012/13	266
2013/14	413
2014/15	316
2015/16	397
2016/17	296

2017/18	594
2018/19	776
2019/20	476
2020/21	
Total	8,590

11. The number of NET affordable housing completions in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.

Year	Net
2000/01	-128
2001/02	-119
2002/03	-49
2003/04	45
2004/05	23
2005/06	-7
2006/07	-18
2007/08	77
2008/09	42
2009/10	-62
2010/11	20
2011/12	8
2012/13	88
2013/14	119
2014/15	15
2015/16	-17
2016/17	-11
2017/18	85
2018/19	53
2019/20	54
2020/21	62
Total	280

12. The number of NET housing completions in Battledown Ward broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer: Please note, the monitoring for the 2020/21 financial year is yet to be completed.

Year	Net
2000	1
2001	5
2002	3
2003/04	22
2004/05	12
2005/06	2
2006/07	75
2007/08	140
2008/09	95
2009/10	85
2010/11	56
2011/12	3
2012/13	4
2013/14	2
2014/15	18
2015/16	23
2016/17	33
2017/18	109
2018/19	35
2019/20	110
Total	833

13. The number of NET affordable housing completions in Battledown Ward broken down on a per annum basis for the period between 2000/01 and 2020/21.

Year	Net
2000/01	3
2001/02	20
2002/03	4
2003/04	3
2004/05	0
2005/06	2
2006/07	0
2007/08	0
2008/09	0
2009/10	0
2010/11	9
2011/12	25
2012/13	17
2013/14	11
2014/15	-1

2015/16	0
2016/17	-2
2017/18	-3
2018/19	-1
2019/20	-2
2020/21	0
Total	85

Right to Buy –

14. The number of social rented dwellings lost in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21 through:
- a. Right to Buy;

Answer:

2000/1	91
2001/2	103
2002/3	101
2003/4	104
2004/5	82
2005/6	34
2006/7	22
2007/8	13
2008/9	1
2009/10	3
2010/11	5
2011/12	7
2012/13	13
2013/14	28
2014/15	13
2015/16	22
2016/17	28
2017/18	26
2018/19	21
2019/20	20
2020/21	15
total	752

- b. Preserved Right to Buy; and - N/A
- c. Voluntary Right to Buy - N/A

15. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Cheltenham Borough Council region broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer:

2015/16	2
2016/17	24
2017/18	10
2018/19	17
2019/20	27
2020/21	26
Total	106

16. The number of social rented dwellings lost in the Battledown Ward broken down on a per annum basis for the period between 2000/01 and 2020/21 through:
a. Right to Buy;

Answer:

Sales	Sales in Battledown (including Ewan's Farm)
2000/1	0
2001/2	2
2002/3	1
2003/4	3
2004/5	2
2005/6	0
2006/7	1
2007/8	0
2008/9	0
2009/10	0
2010/11	0
2011/12	0
2012/13	0
2013/14	0
2014/15	0
2015/16	0
2016/17	0

2017/18	0
2018/19	1
2019/20	0
2020/21	0
total	10

- b. Preserved Right to Buy; and – N/A
- c. Voluntary Right to Buy – N/A

17. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the Battledown Ward broken down on a per annum basis for the period between 2000/01 and 2020/21.

Answer:

	Battledown Ward New Build & Purchases
2011/12	0
2012/13	0
2013/14	0
2014/15	0
2015/16	2
2016/17	1
2017/18	2
2018/19	0
2019/20	1
2020/21	0
	6

Temporary Accommodation –

18. The number of households on the Housing Register housed in temporary accommodation within the Cheltenham Borough Council region at 1st April 2021.

Answer: Nine

19. The number of households on the Housing Register housed in temporary accommodation outside the Cheltenham Borough Council region at 1st April 2021.

Answer: None

20. The number of households on the Housing Register housed in temporary accommodation within the Cheltenham Borough Council region at 1st April 2020.

Answer: Seventeen

21. The number of households on the Housing Register housed in temporary accommodation outside the Cheltenham Borough Council region at 1st April 2020.

Answer: None

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

Appendix 2

Extracts from Planning Practice Guidance
(March 2014, Ongoing Updates)



Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-006-20190220	<p>This section sets out that assessments of housing need should include considerations of and be adjusted to address affordability.</p> <p>This paragraph sets out that <i>“an affordability adjustment is applied as household growth on its own is insufficient as an indicators or future housing need.”</i></p> <p>This is because:</p> <ul style="list-style-type: none"> • <i>“Household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and</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>
Housing and Economic Needs Assessment	018 Reference ID 2a-01820190220	Sets out that <i>“all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework”</i> .
Housing and Economic Needs Assessment	019 Reference ID 2a-01920190220	States that <i>“strategic policy making authorities will need to estimate the current number of households and projected number of households who lack 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	020 Reference ID 2a-02020190220	<p>The paragraph sets out that in order to calculate gross need for affordable housing, <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</i>

		<i>afford their own homes, either to rent, or to own, where that is their aspiration.”</i>
Housing and Economic Needs Assessment	024 Reference ID 2a-02420190220	<p>The paragraph states that <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>It also details that:</p> <p><i>“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>
Housing Supply and Delivery	031 Reference ID: 68-031-20190722	<p>With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states:</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)”</i></p>

Appendix 3

The National Housing Crisis



The National Housing Crisis

1. There is incontrovertible evidence that there is a national housing crisis in the UK affecting many millions of people, who are unable to access suitable accommodation to meet their housing needs. This section highlights some of this evidence and the Government's response to grappling with this issue.

Laying the Foundations – A Housing Strategy for England (November 2011)

2. Laying the Foundations: A Housing Strategy for England was published on 21 November 2011. The foreword by the former Prime Minister and former Deputy Prime Minister set out the former Coalition Government's intention to unblock the housing market and tackle the social and economic consequences of the failure to develop sufficient high-quality homes over recent decades.
3. The Executive Summary signed off by both the then Secretary of State for Communities and Local Government and the then Minister for Housing and Local Government included the following:
 - A thriving active but stable housing market that offers choice, flexibility and affordable housing is stated as being critical to our economic and social wellbeing;
 - *'The problems we face are stark'* and have been compounded by the impact of the credit crunch;
 - *'Urgent action to build new homes'* is necessary as children will grow up without the opportunities to live near their family and older people will not have the choice and support, they need;
 - *'Housing is crucial for our social mobility, health and wellbeing'*;
 - *'Housing is inextricably linked to the wider health of the economy'*; and
 - Fundamental to the whole approach of the strategy is communities (including prospective owners and tenants), landlords and developers working together.

House of Commons Debate (October 2013)

4. A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply; despite the debate taking place over six years ago the issues remain, and the commentary is sadly still highly pertinent to the issues

surrounding affordable housing in Cheltenham. The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:

“I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”

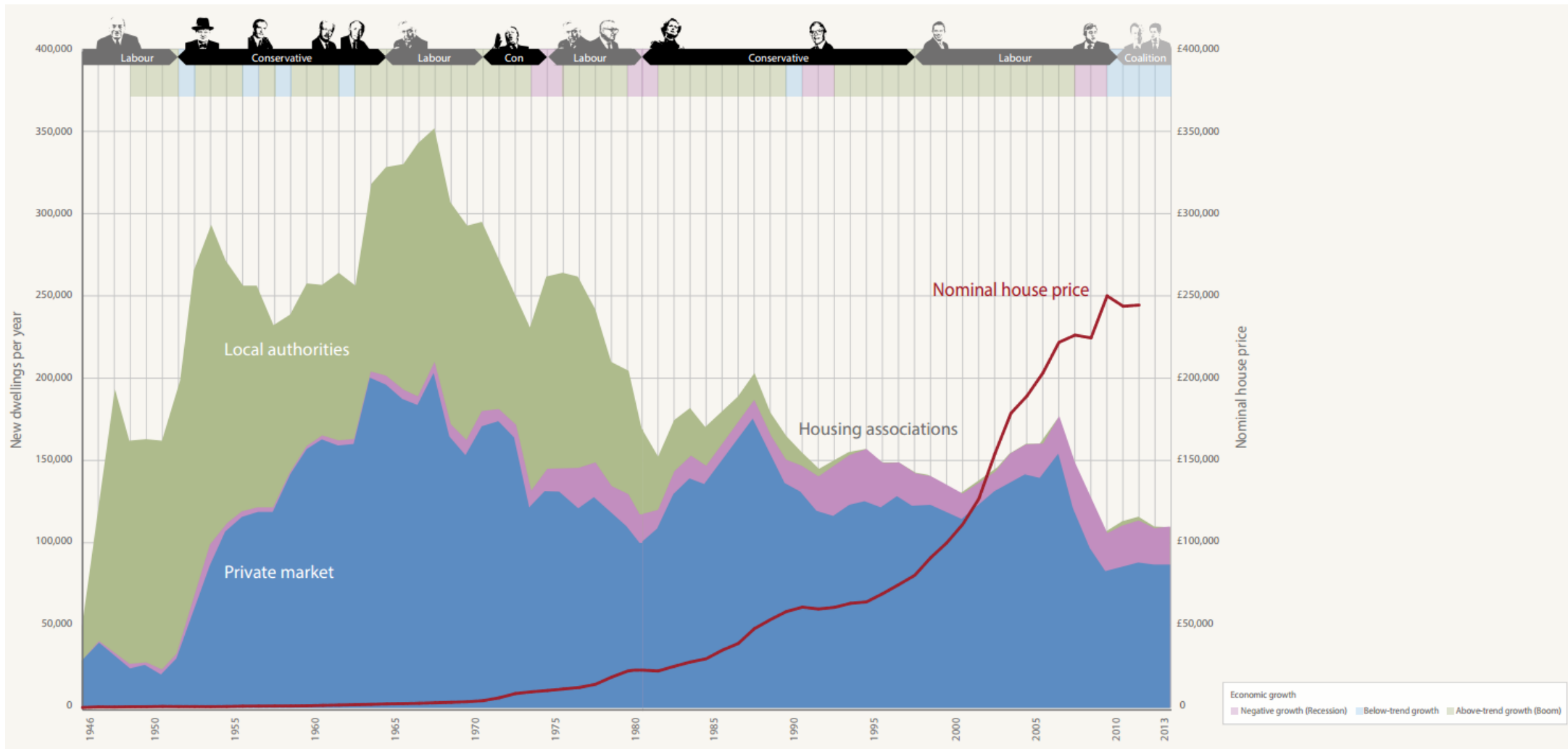
5. When asked to clarify the word “*crisis*” by the Member for Tewkesbury, Nick Boles commented that in the past year the percentage of first time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.
6. In response to questions, Nick Boles reaffirmed that:

“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.
7. He went on to say: “*It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”*
8. Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

Building the Homes We Need (April 2014)

9. This report was the result of a year-long project by KPMG and Shelter to understand the housing shortage and was intended to provide advice to the incoming 2015 Government.
10. The report started by setting out that *“everyone now accepts that we have a desperate housing shortage in England.”* It further explained that *“each year we build 100,000 fewer homes than we need, adding to a shortage that has been growing for decades. What’s more, our current house building system seems incapable of delivering growth on the scale required. Growing demand means that without a step change in supply we will be locked into a spiral of increasing house prices and rents – making the current housing crisis worse”.*
11. The report highlighted that if we do not take firm action to build more homes there will be very worrying consequences for our economy and society; including rising homelessness, stalled social mobility, declining pension saving and an ever-rising benefit bill.
12. The report set out the graph illustrated in figure 3.1 showing the levels of house building in England since 1946.

Figure 3.1: House building since 1946



Source: *Building the Homes We Need, Shelter and KPMG (2014)*

13. Figure 3.1 graph shows four interrelated trends:
- An overall decline in house building since 1946, including a steep decline from 1980 and a marked further decline since 2007;
 - Relatively high levels of social housing provision by local authorities up until the mid-1970s;
 - The growing relative contribution to affordable housing provision by housing associations since the late 1980s; they are providing most of the new affordable housing stock but not matching anything like the previous local authority contribution; and
 - The gradual increase in the nominal house price through until about 1985 then grows exponential over the subsequent 30 years. There appears to be a correlation with the decline in new housing provision, although there are clearly other interrelated factors.

Fixing our Broken Housing Market (February 2017)

14. The Housing White Paper: Fixing our Broken Housing Market, was published in February 2017. The foreword by the then Prime Minister, Theresa May, was very clear that the housing crisis is one of the biggest barriers to progress facing the country.

15. The then Prime Ministers foreword stated that:

“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working-class people who are struggling to get by.

Today the average house costs almost eight times average earnings – an all-time record. As a result, it is difficult to get on to the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000.

These high housing costs hurt ordinary working people the most. In total more than 2.2 million working households with below-average incomes spend a third or more of their disposable income on housing.

This means they have less money to spend on other things every month, and are unable to put anything aside to get together the sums needed for a deposit...

...I want to fix this broken market so that housing is more affordable, and people have the security they need to plan for the future.

The starting point is to build more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the costs of renting down...

...By building the homes Britain needs and giving those renting a fairer deal, we will give those growing up in society today more chance of enjoying the same opportunities as their parents and grandparents. It will ensure that the housing market is as fair for those who don't own their own homes as it is for those that do. This is a vital part of our Plan for Britain and a critical step along the way towards fulfilling the mission I have set out to make Britain a country that works for everyone."

16. The former Secretary of State for Communities and Local Government, Sajid Javid, also provided commentary on the housing crisis in his foreword to the White Paper where he stated that:

"This country doesn't have enough homes. That's not a personal opinion or a political calculation. It's a simple statement of fact.

For decades, the pace of house building has been sluggish at best. As a result, the number of new homes has not kept pace with our growing population. And that, in turn, has created a market that fails to work for far too many people.

Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation...

...The housing market has taken decades to reach the state it's now in. Turning it around won't be quick or easy. But it can be done. It must be done".

17. The introduction to the White Paper was clear:

"The housing market in this country is broken, and the cause is very simple: for too long, we haven't built enough homes".

18. It goes onto explain that since the 1970s, there have been on average, 160,000 new homes each year in England and that the consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under-supply. The laws of supply and demand mean the result is simple. Since 1998, the ratio of average house prices to average earnings has more than doubled. That means the most basic of human needs – a safe, secure home to call your own – isn't just a distant dream for millions of people. It's a dream that's moving further and further away.

19. Furthermore, as recently as the 1990s, a first-time buyer couple on a low-to-middle income saving 5% of their wages each month would have enough for an average sized deposit after just three years. Today it would take them 24 years. It's no surprise that home ownership among 25 to 34-year olds has fallen from 59% just over a decade ago to just 37% today.
20. The White Paper also reported that Britain's broken housing market hurts all of us. Sky high property prices stop people moving to where the jobs are. That's bad news for people who can't find work, and bad news for successful companies that can't attract the skilled workforce they need to grow which is bad news for the whole economy.
21. Section four of the White Paper identified at paragraph 4.1 that England has some of the highest house price inflation and worst affordability in the OECD. An average home now costs almost eight times average earnings, and nearly 30% of local authorities have house prices over 10 times average earnings.
22. Paragraph 4.3 revealed that rising prices are particularly tough on younger people trying to get onto the housing ladder or wanting to move into their first family home. Some young people have no choice but to continue to live with their parents, friends or strangers to make ends meet. Renters are seeing their rents rise; some are only just managing to cover their costs. For the average couple in the private rented sector, rent now takes up roughly half of their gross income.
23. At paragraph 4.4 the White Paper reported that in areas where the housing shortage is most acute, high demand and low supply is creating opportunities for exploitation and abuse: unreasonable letting agent's fees, unfair terms in leases, landlords letting out dangerous, overcrowded properties. In short, it's becoming harder to rent a safe, secure property. And more and more people can't find a place to rent at all, added to which the loss of a private rented sector tenancy is now the most common cause of homelessness.

Priced Out: Affordable Housing in England (November 2017)

24. The Institute for Public Policy Research (IPPR) identified that affordable housing delivery continued to fall well behind the required level of need. In this study, the IPPR provided an overview of current affordability challenges across England, alongside a set of recommendations to increase affordable housing delivery.
25. The report found that in 67% of local authorities across England, insufficient homes were built to meet demand in 2015/16. In addition, house prices have risen by 76%

since 1995, far outstripping inflation and as a result are out of reach to many on average incomes.

26. It also highlighted that the nature of affordable housing has changed in recent years. The range of available products has increased with these products becoming increasingly divorced from earnings and linked to market prices or rents.
27. Many affordable housing models are out of the reach of single people. Whilst dual earning couples, even those with lower quartile earnings, can afford most models in most areas, when income is diminished by the removal of a full-time earner as in the case of couples with a child, a much larger range of models become out of reach, particularly for those on lower incomes.

Government Post-EU Referendum

28. The government which formed after the Brexit vote continued to pursue the issue of increased housebuilding. In commenting upon the increase on the number of new homes built and started in June 2016 the-then Communities Secretary Sajid Javid said:

“We’ve got the country building again with more new homes started and built than this time last year...

...This is real progress but there is much more to do. That’s why we are going further and increasing our investment in house building to ensure many more people can benefit.”
29. In terms of continued support for home ownership the then Housing and Planning Minister Gavin Barwell said in response to the English Housing Survey (released 21 July 2016):

“We are determined to ensure that anyone who works hard and aspires to own their own home has the opportunity to do so...

Since 2010 over 300,000 households have been helped into home ownership through government-backed schemes...

The ground-breaking Housing and Planning Act will allow us to go even further delivering our ambition to build an additional one million homes.”
30. This suggests that successive governments are continuing with their earlier aspirations and policies regarding housebuilding and homeownership.

**Former Secretary of State for Housing, Communities and Local Government
Speech to Local Government Association Conference (July 2017)**

31. At the beginning of July 2017 the then Secretary of State for Housing, Communities and Local Government, Sajid Javid, addressed the conference reflecting on *“what has gone wrong in local government”* and outlining what the national and local governments need to do to address the nationwide housing crisis.
32. On housing, Mr Javid stated that *“there’s a serious shortage of decent, affordable housing in this country”*. He added *“since the 1970s – under Wilson, Callaghan, Thatcher, Major, Blair, Brown, Cameron and now May – we’ve supplied an average of 160,000 new homes each year. That’s far below what’s needed, and that failure of supply to keep up with demand has led to predictable results”*.
33. Mr Javid summarised the issue, by outlining that *“the simple fact is that to put this right we need to build more homes that people want to live in, in places people want to live”*.

Former Prime Minister’s Speech (15 November 2017)

34. In November 2017, former Prime Minister Theresa May delivered a speech in which she made it her ‘mission’ to speed up the delivery of more homes.
35. Mrs May announced that *“for decades we simply have not been building enough homes, nor have we been building them quickly enough, and we have seen prices rise”*. Whilst *“the number of new homes being delivered each year has been increasing since 2010”* and acknowledged that *“there is more we can do”*.
36. She stated that *“we must get back into the business of building the good quality new homes for people who need them most”* and *“that is why I have made it my mission to build the homes the country needs and take personal charge of the Government’s response”*.
37. The former Prime Minister added that *“today I am seeing the work now underway to put this right and, in coming weeks and months, my Government will be going further to ensure that we build more homes, more quickly”*.
38. In concluding, Theresa May stated that *“this will be a long journey and it will take time for us to fix the broken housing market - but I am determined to build a Britain fit for the future”*.

**Former Secretary of State for Housing, Communities and Local Government
Speech on the Housing Market (16 November 2017)**

39. The day after the former Prime Minister pledged her commitment to providing more homes, former Communities Secretary Sajid Javid delivered a speech setting out his blueprint for boosting housing provision.
40. Mr Javid announced that following the publication of official figures, there was an additional 217,000 new homes (net) which were delivered during the 2016/17 financial year. He added that this was the *“first time in almost a decade that the 200,000 milestone had been reached”*.
41. However, Mr Javid acknowledged that *“it is painfully obvious that there remains much, much more to be done”*, and that *“fixing the broken housing market will require a much larger effort”*.
42. He set out that *“even today, I still hear from those who say that there isn’t a problem with housing in this country. That we don’t need to build more. That affordability is only a problem for Millennials that spend too much on nights out and smashed avocados. It’s nonsense...where once it would have taken an average couple 3 years to save for a deposit – it will now take a quarter of a century. Assuming of course they could save at all”*.
43. Mr Javid compared the position of a first-time buyer in London saying a deposit of more than £90,000 was needed and lamented *“that’s a lot of avocados.”*
44. The former Communities Secretary stated that *“without affordable, secure, safe housing we risk creating a rootless generation, drifting from one short-term tenancy to the next, never staying long enough to play a real role in their community”*.

**Former Prime Minister’s Speech to the National Housing Federation Summit
(September 2018)**

45. There is continued acknowledgment from the-then Prime Minister that the housing market is broken with the importance of more indistinguishable, high quality affordable homes being a crucial to resolving the housing crisis, with housing associations being at the forefront of increased affordable housing delivery.
46. In her speech to the National Housing Federation, Theresa May spoke to housing leaders about tackling *“what remains one of the greatest challenges of our time”* and *how she has made it her “personal mission to fix our broken housing system”*.

47. The former Prime Minister set out that one of the Government's priorities is:
"doing all we can to get more of the right homes built in the right places, so we can help more people onto the housing ladder – and ensure that those who cannot afford to own their own home also have a decent place to live".

48. She went on to make clear that:

"the housing crisis we face today did not come about overnight. It is the result of decades of neglect. Year after year in which housebuilding of all kinds fell even as demand rose. So, while the steps we are taking are already making a real and lasting difference to millions of lives, we should not pretend that our broken housing system can be fixed at the flick of a switch."

House of Commons Briefing Paper: Tackling the under-supply of Housing (12 December 2018)

49. The Paper provided an analysis of evidence in relation to how much housing the UK needs, trends in UK housing supply, barriers and solutions to supply in England and additional responses to the Housing White Paper.

50. The Briefing Paper set out that *"according to DCLG's projections, the number of households in England is expected to grow from 22.7 million in 2014 to 28.0 million in 2039. This is an average increase of around 210,000 households per year."*

51. It stated that *"in 2015/16, the total housing stock in England increased by around 190,000 residential dwellings: 12% higher than the previous year's increase but a long way short of the estimated 240-250,000 new homes needed to keep pace with household formation"* (my emphasis).

52. The Paper went on to identify that *"the new supply of social housing has not kept pace with growth in other sectors; in the long term, it has generally been lower than the amount lost through sales and demolitions"* (my emphasis).

Centre for Policy Studies Press Release (January 2019)

53. The press release outlines new analysis indicating that the 2010s will see housebuilding figures in England come in below any decade since the Second World War which is part of a 50-year pattern in which each decade has seen fewer new homes built than the last.

54. It stated that despite the Government's recent efforts to boost construction, new-build housing completions in England between 2010 and 2019 are set to be approximately

130,000 per year - well below the 147,000 of the 2000s or 150,000 of the 1990s, and half of the level in the 1960s and 1970.

55. It goes on to say the picture becomes even worse when you factor in population size. In the 1960s, the new-build construction rate in England was roughly the equivalent of one home for every 14 people over the decade. In the 2010s, that ratio was one to 43, more than three times higher.

Building for Our Future: A Vision for Social Housing (January 2019)

56. The report produced by Shelter states three million homes must be built in England over 20 years to solve the housing crisis. It advises 1.2 million homes are needed for younger families who cannot afford to buy and face a lifetime in expensive and insecure private renting.
57. The research estimates 277,000 people are homeless in England, most commonly because they have lost their privately rented homes. The report indicates that upfront costs of £11bn a year could come from housing benefit savings by moving tenants from privately rented homes to social housing.
58. It also claims that schemes such as Help-to-Buy are a less effective use of taxpayers' money. It reports that 59% of people who used Help to Buy said they could have afforded the same or a similar property without using the scheme, meaning that only 24,000 households have been able to get into home ownership because of Help to Buy.

Bleak Houses: Tackling the Crisis of Family Homelessness in England (August 2019)

59. The report was produced by the Children's Commissioner to investigate the impact of homelessness and in particular the effect of this upon children.
60. It identifies that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms. It states that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, as a result of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
61. The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It states that

“Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work”.

62. The report particularly focused on the effect on children. In particular the report reveals that many families face the problem of poor temporary accommodation and no choice but to move out of their local area, which can have a *“deeply disruptive impact on family life”*. This can include lack of support (from grandparents for example) and travel costs.
63. It finds that a child’s education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children’s educational development can also be delayed.
64. Temporary accommodation also prevents serious risks to children’s health, wellbeing and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour or those with substance abuse issues.
65. Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a *“significant impact on many aspects of their lives”*.

House of Commons Debate on a Motion on the British Housebuilding Industry (August 2019)

66. The debate pack was produced by the House of Commons Library in August 2019 in advance of a debate on the British housebuilding industry in September 2019.
67. The report noted at paragraph 1.2 that there were 83,700 homeless households living in temporary accommodation in England at the end of December 2018, a 74% increase compared with December 2010.
68. Furthermore, the number of people sleeping rough in England on any given night in Autumn 2018 was 4,677 people, 165% higher than in 2010.
69. In the debate itself, it resolved at Column 465, 4.59pm, that:

“This House notes with concern the ongoing shortage of housing and the housing crisis across England; further notes with concern the number of families in temporary accommodation and the number of people rough sleeping; [and] acknowledges that there are over one million households on housing waiting lists...”

70. It concluded that it “*calls on the Government to tackle the housing crisis as an urgent priority*” (my emphasis).

Housing Minister’s speech to the RESI Convention 2019 (September 2019)

71. Following her appointment as the then Housing Minister on 24 July 2019, Esther McVey spoke at the RESI Convention claiming that the shortage of housing in the UK is possibly the largest scandal to hit the country in the past 30 years.
72. Ms McVey acknowledged that the housing crisis has led “*to a rise in renting and costs, and to a fall in home ownership which has destroyed the aspiration of a generation of working people.*”
73. Continuing to talk on the subject of affordability, the Housing Minister stated that:

“*Since the mid-1990s, house prices have risen to 8 times, 10 times, 12 times, in some of the most expensive parts of this country 44 times the actual income of someone, that cannot be right.*”
74. Ms McVey detailed that “*too many people feel that vital link between hard-work and owning their own home is broken. And when that link is severed, social mobility and opportunity falls away.*”

National Housing Federation Research (September 2019)

75. The National Housing Federation (NHF) published new research on the state of the housing crisis which found that 8.4 million people across England are directly affected by the housing crisis, which amounts to one in seven people.
76. The NHF report that people are affected in a variety of ways, including:
- Living in overcrowded homes;
 - Living with ex-partners or parents;
 - Living in unsuitable homes, such as homes that are not suitable for people with mobility issues; and
 - People who are homeless or at risk of homelessness.
- 3.61 Of these 8.4 million, around half, some 43% or 3.6 million, would need a social rented home to meet their needs.

77. Commenting on the NHF's report the Local Government Association said that the Government "*should now go further and devolve Right to Buy so that councils retain 100 per cent of their receipts to reinvest*".

Conservative Party Manifesto (December 2019)

78. The Conservative Party Manifesto for the December 2019 election reports at page 29 that "*the biggest problem that young people face in getting on the housing ladder is the deposit.*" It commits to ensure that the Government will "*offer more homes to local families*"
79. At page 30 of the Manifesto it states that "*home ownership is one of the most fundamental Conservative values. People are happier, more secure and more rooted in their communities when they own their own home – and know that they can pass it on to future generations*". It goes on to set out that "*young people need the security of knowing that home ownership is within their reach – that they too can have a tangible stake in society, can be rooted in their communities and have a place to raise a family*".
80. The Manifesto (page 30) details that "*while we want to encourage as many people as possible into home ownership, we recognise that not everyone can afford their own home – and that those in social housing deserve the same dignity, respect and fair treatment as private renters*". It commits to bring forward a Social Housing White Paper to "*support the continued supply of social housing*" and commits to "*end the blight of rough sleeping by the end of the next parliament*".
81. Under the heading of 'places we want to live in' at page 31, the Manifesto explains that despite increased housebuilding since 2010 "*it still isn't enough. That is why we will continue our progress towards our target of 300,000 homes a year by the mid-2020s. This will see us build at least a million more homes, of all tenures over the next Parliament*".

BBC Housing Briefing (February 2020)

82. The BBC Housing Briefing summarises a range of secondary data and case studies relating to the scale of housing need, quality, availability, and tenure. Sections 1 to 4 cover the broad context and issues; sections 5 to 7 consider the role of the public and private sectors in housing provision; and sections 8 to 10 cover policy mechanisms to address housing issues. The Briefing is prepared at the national level and sets out the overall 'picture' in respect of housing matters.

83. The Briefing was the topic of several news stories on the BBC Website and was widely promoted on the day of its publication, including through radio phone-ins, television news items, and the Bitesize revision service for teenagers.
84. The BBC states that the Housing Briefing was prepared in order to address public demand for *“more transparency and better explanation of the facts behind the headlines”*. The acknowledgements include Dame Kate Barker who undertook a review of the housing market in 2004, and Toby Lloyd, the former policy director of Shelter.
85. Section 8 of the Briefing refers to the scale of the housing shortfall that has amassed in recent years. It highlights at page 134 the work undertaken by Dame Kate Barker in 2004, the KPMG/Shelter study of 2014; the joint study between Heriott Watt University, Crisis and the National Housing Federation in 2018/9; all of which are referenced at Section 4 of this Proof of Evidence.
86. The Briefing contains case studies throughout which highlight the impact of the housing crisis on real people and households. These include the numerous case studies at pages 33, 40, 66, 69, 84, and 125 which include those in desperate need, facing homelessness or temporary accommodation, and those trapped in rented housing unable to afford to purchase.
87. The Briefing also refers to the serious impact of family homelessness upon children at page 34 and the work undertaken by the Children’s’ Commissioner, which I have reviewed at paragraphs 3.49 to 3.55 of this section.

Spring Budget 2020 (March 2020)

88. The Spring Budget 2020 was presented by the Chancellor of the Exchequer, Rishi Sunak, to Parliament on 11 March, setting out an ambitious package of investment plans in the first Budget since the UK’s departure from the European Union (EU).
89. Speaking on housing, the Chancellor stated the following:

“Everyone should be able to access a safe and affordable home. Increasing housing supply is essential to creating a fairer, more affordable housing market and boosting productivity across the country”.
90. The Chancellor continued to explain in further detail the demand for more housing in the UK, concluding his points by confirming that *“the government has committed to creating at least 1 million new homes in England by the end of this Parliament and an average of 300,000 homes a year by the mid-2020s.”*

91. The Chancellor also confirmed that the Government will be investing a further £9.5 billion into the Affordable Homes Programme, raising the level of investment to £12.2 billion of grant funding from 2021-22 to support the creation of affordable homes across England.

‘Planning for the Future’ Policy Paper (March 2020)

92. On 12 March 2020, and as trailed in the Budget the previous day, the Government published a policy paper titled ‘Planning for the Future’. It provides a summary of the reforms the Government expects to explore in more detail in the forthcoming Planning White Paper, expected later in 2020.
93. The introductory paragraphs emphasise the Government’s intention to boost homeownership, noting at paragraph 2 *that “for many who are still trapped paying high rents and struggling to save for a deposit, home ownership seems like a dream which is increasingly out of reach”*. The paper also clearly recognises the importance of providing for those who are not homeowners. Paragraph 4 states *that “We must ensure security for those who do not own their homes”* and that *“We also need to prevent people from falling into homelessness by building more affordable homes and ensure that those living in social housing are treated with the dignity and respect they deserve”*.
94. Relevant measures proposed in the policy paper include those to help first time buyers onto the property ladder (paragraph 14), through the proposed First Homes scheme, work to deliver long-term fixed rate mortgages, and a new Shared Ownership model. Paragraph 17 goes further in respect of affordable housing, noting that *“We [the Government] are committed to improving access to safe and high-quality housing, improving affordability...”* and proposed measures include a renewed financial commitment to affordable housing and a package of measures to protect social and private sector renters. Paragraphs 18 to 20 explain that, in order to inform the Planning White Paper the Government will review the housing market and planning system and will consider, amongst other related matters, *“how to ensure affordable, quality, safe housing”*.

Affordable Housing Commission Report (March 2020)

95. The Affordable Housing Commission (AHC) is an independent, non-partisan group comprising fifteen experts drawn from the public, private and voluntary sectors. Its extensive full report was released in late March 2020 and examines a wide range of issues relating to the housing affordability crisis, with data from a wide range of

sources. The AHC report examines the approach taken to affordable housing through the planning system; the definition of an 'affordable' rent; the challenges facing households in housing stress; and other measures including the approach taken to public investment and taxation.

96. The AHC report paints a bleak picture of housing affordability at present. It makes the simple proposition that *“Something has gone fundamentally wrong with the housing system and what it offers local people”*. The effects of this are serious and wide-ranging. The AHC notes that:

“Housing stress is impoverishing families and young and old struggling renters, creating debts and arrears, harming health and well-being, and limiting life chances and aspiration. There are wider negative effects too – on the economy and productivity, on wealth inequality and poverty – resulting in more public expenditure subsidising rents and healthcare and tackling homelessness”.

97. The AHC concludes that the root cause of the current affordability crisis is a clear shift in the structure of the housing market over the last 20 years. The AHC note that social rented sector has contracted, with low rates of new supply and extensive losses through the Right to Buy. By contrast, the AHC notes that the private rented sector has expanded significantly, even though it is ill-equipped to provide for those groups in greatest housing need.

98. The AHC is clear that the housing crisis is of such a scale that it will take many years to resolve. Its first recommendation is that that the Government commits to ensure all households have access to affordable housing by 2045 so that the next generation does not face the same kind of hardships as the current.

99. Its package of 53 recommendations seek to substantially boost the role of the social rented sector, whilst also helping a sizeable cohort of households termed 'frustrated first time buyers' into homeownership. Key recommendations for planning include recommendation 5 to address the supply of affordable housing, namely that *“the government seeks a step change in affordable housing supply in line with the latest assessments of housing need. On current best evidence, this would equate to an increase to about 90,000 social rented homes a year (forming part of the government's overall housing target of 300,000 homes a year)”*. Recommendation 43 notes the important role that Local Planning Authorities must play in this, and states that:

“The Commission recommends that the preparation of local plans be made an enforceable statutory duty to ensure that all councils are delivering on their housing

plans and targets. Local and city-region plans must be based on accurate housing needs assessment – including numbers of concealed households – which should be updated regularly”.

100. Recommendation 16 addresses the impact of Right to Buy and proposes reforms to the system. It states that:

“The Commission recognises that the Right to Buy remains a popular scheme. However, it is undermining efforts to address affordability, reducing numbers of relets at lower rents and moving properties from social renting to the PRS. Accordingly, the Commission recommends that the RTB is radically overhauled, including giving councils and housing associations discretion over the level of discount they offer, complete control over receipts and the opportunity to restrict any letting by a purchaser (e.g. requiring consent for letting the property)”.

Speech by the Housing Minister Christopher Pincher at the Planning Inspectorate Annual Training Event (March 2020)

101. In a speech on 9 March 2020 to the Planning Inspectorate, the current Housing Minister, Christopher Pincher stated that:

“I know a lot about the need for new and better homes. Because in my part of the world, houses for purchase and rent are appreciatively more expensive than in other parts of the West Midlands as we simply do not have enough homes.

There isn’t a week that goes by without my constituents contacting me saying, “Chris, we just aren’t able to buy or to rent the homes that we want to live in in this beautiful part of the world.” (emphasis added)

Shelter/Savills - Social Housing & Britain’s Housebuilding Recovery (June 2020)

102. Analysis undertaken by Shelter and Savills in June 2020 identifies a range of scenarios for housebuilding recovery following the significant impact Covid-19 has had for the housebuilding industry and the wider economy in 2020.
103. The scenarios anticipate that between 125,000 and 318,000 fewer new dwellings will be delivered in the five years 2020-2025 as a result of Covid-19, equating to a 9-23% drop in delivery.
104. Of these, between 25,000 and 66,000 fewer affordable homes will be delivered (an 8-21% drop in delivery). Of these scenarios, the ‘best case’ assumes a rapid economic

recovery (e.g. in light of medical advances) and the worst case assumes deeper and longer economic difficulties.

105. Shelter recommends boosting social housing provision in order to support overall housing output, with social housing demand being counter-cyclical to the prevailing wider economy.

Housing, Communities and Local Government Committee: Building more social Housing, Third Report of Session 2019–21

106. The Housing, Communities and Local Government Committee held an inquiry in 2020 into the delivery of social housing, building upon work undertaken in 2018 by its predecessor committee. The inquiry sought to investigate matters relating to the long-term delivery of social and affordable rented homes in England.
107. The Committee identified several matters of concern relating to the state of the housing market and the availability of affordable housing. Drawing in evidence from housing associations, charitable bodies and local authorities, the Committee noted the research by Shelter that some 500,000 households are homeless or not living in satisfactory housing; some 1 in 9 children live in overcrowded homes, and that use of Temporary Accommodation has risen by 82% since 2010. It also noted the increasing rates of poverty observed in the private rented sector, and the Committee supported the Affordable Housing Commission's finding that where housing costs more than one third of household incomes then serious issues such as arrears and debts become prevalent.
108. In terms of the annual need for affordable homes, the Committee considered evidence from a number of sources and was supportive of the work by the National Housing Federation in 2018 which identifies an annually-arising need for around 90,000 social rented homes, 30,000 affordable rented homes, and 25,000 shared ownership homes. The Committee noted that although local authority housing registers had declined this was largely attributable to the provisions of the Localism Act 2011 which allowed councils to apply additional eligibility criteria.
109. The Committee was critical of the impact of Right to Buy losses upon the overall affordable housing stock which resulted in a significant depletion of the affordable housing stock – falling from 5.49 million dwellings in 1981 to 4.13 million dwellings in 2019. The Committee noted that the Government's aim of a one-for-one replacement was not being achieved and that restrictions on the spending of receipts limited the ability of councils to replace lost stock.

110. The Committee has set out a package of recommendations which include improvements to the way housing statistics are collated and published, prioritising a social housebuilding programme, reforms to compulsory purchase rules, and reforms to the Right to Buy.

White Paper: Planning for the Future (August 2020)

111. On 6 August 2020, the Ministry of Housing, Communities and Government opened a 12-week public consultation on the long anticipated Planning for the Future White Paper. The Planning for the future consultation proposes reforms of the English planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed.

112. In his foreword on page seven of the White Paper, the Prime Minister, Boris Johnson, highlights the importance of housing delivery, stating the following:

‘And, above all, that gives the people of this country the homes we need in the places we want to live at prices we can afford, so that all of us are free to live where we can connect our talents with opportunity.

Getting homes built is always a controversial business. Any planning application, however modest, almost inevitably attracts objections and I am sure there will be those who say this paper represents too much change too fast, too much of a break from what has gone before.

But what we have now simply does not work.

So let’s do better. Let’s make the system work for all of us. Any let’s take big, bold steps so that we in this country can finally build homes we all need and the future we all want to see.’

113. On page eight, in his foreword, the Secretary of State for Housing, Communities and Local Government, Robert Jenrick, declares:

“These proposals will help us to build the homes our country needs, bridge the present generational divide and recreate an ownership society in which more people have the security and dignity of a home of their own.”

Speech by Secretary of State for Housing, Communities and Local Government to the Chartered Institute for Housing (September 2020)

114. The Secretary of State, Robert Jenrick, gave a speech to the Chartered Institute of Housing (CIH) in September 2020 covering a range of issues including affordable housing.
115. The Secretary of State made clear the problems that the Covid-19 pandemic has caused for those less fortunate than most – those stuck in poor, cramped accommodation, struggling to pay the rent, or those – worst of all – who have no home of their own at all. For these people, Jenrick stated that the pandemic ‘has unquestionably been one of the darkest periods’.
116. Jenrick stated that ‘they deserve better’ and that, as we recover from the pandemic, the Government is absolutely determined to deliver the homes needed.
117. The Secretary of State recognised that there is ‘still a great deal more to do’ to help those trapped paying high rents who are ‘struggling to save for a deposit to enjoy homeownership or even to enjoy the security and the dignity that comes with a secure home of their own, whether that be owned or rented’.
118. Jenrick stated specifically that ‘*Affordability remains a very big issue across the board’ and that ‘issues around affordability are higher than ever on our agenda’.*
119. The speech talked about the Government’s Affordable Homes Programme (AHP) announcement, which aims to deliver up to 180,000 affordable homes over five years from 2021 to 2026, right across the country. This is part of the Government’s commitment to ‘levelling up’ and ensuring that opportunities are available to people across the country.
120. Jenrick went on to say that ‘*whether we’re aiming to help more people onto the housing ladder, people who are renting or, crucially, who are homeless or sleeping rough, we will only succeed if we build more homes*’
121. The Secretary of State also highlighted the planning reforms that were set out at the beginning of the summer, which he stated will help to deliver even more affordable homes.
122. The Secretary of State for Housing, Communities and Local Government concluded that, to be on track to realise individual hopes and dreams, and to power the economy and social revival, requires ‘building more homes – affordable homes’, getting more people onto the housing ladder and ‘building where affordability is most challenging’.

NHF – People in Housing Need (September 2020)

123. In September 2020, the NHF (National Housing Federation) published an analysis of the scale and shape of housing need in England today.
124. On page 4, the report shows that '*nearly 8 million people in England have some form of housing need*'. Nearly 1.9 million households are hosting a 'concealed' household while 3.4 million people found to be living in overcrowded accommodation.
125. The report expresses concern that the number of people in need of social housing could rise rapidly as a result of the coronavirus crisis – with low-income earners roughly twice as likely to lose their jobs.
126. It finds (page 2) that '*Long-term investment in social housing is needed to tackle this problem and provide people with suitable homes they can afford*'.
127. The report describes how the number of people in need of social housing in England has now hit 3.8 million people. This equates to 1.6 million households – 500,000 more than the 1.16 million households recorded on official waiting lists.
128. The report provides a clear measurement of housing need, necessary because local housing registers (or waiting lists) have become inadequate following the introduction of the Localism Act in 2011.
129. It states (page 3) that '*There is now no consistent set of criteria for allowing households to join a register*' and the data on these registers is not necessarily reviewed for accuracy on a regular basis. While local registers serve an important function, '*they do not give the full picture of how many people are in need of a home*', hence the reason for the NHF analysis.
130. The report identifies how '*the housing crisis is not one crisis, but a series of interrelated and overlapping crises*' (page 3). These include affordability, the suitability, size and condition of homes, and the ability of people to find accommodation in the first place. Some people will experience one of these problems – others will experience many at once. The complicated picture of interrelated housing crises means there is a need for new, accurate and comprehensive research on housing need, the report finds.
131. It reveals that the number of people for whom social rent is the most appropriate tenure has increased since the previous iteration of the analysis. It states that '*This suggests an intensifying of need at the 'sharp end' – things are getting worse for the worst off*' (page 5). This is reflected both in the growth in the numbers of people affected by affordability issues and in the growth in overcrowding.

132. The report continues that more than 3.4 million people were found to be living in overcrowded households, a 5% increase on the previous figures, and 2.7 million were found to have an affordability issue – up nearly 10%.
133. As might be expected, a significant proportion of these people are to be found within the social sector already. Overcrowding is a known issue in this sector, the report establishes. A shortage of larger homes can make finding a suitably sized home more difficult for families as a result of the sale of council housing and a decrease in government funding for building new social homes since 2010.
134. This is because larger, family homes are more expensive to build and therefore more difficult to build with less government funding. The ‘spare bedroom subsidy’ has also acted as an incentive for developers to build smaller homes. Given the freeze on working-age benefits (introduced in 2016 following the 2015 Budget), benefits sometimes *‘no longer cover even the cheapest forms of social housing rent’*, the report finds (page 6).
135. Meanwhile the analysis finds that nearly 1.9 million households are hosting a ‘concealed’ household, and that concealed households make up the third largest group of people affected, including nearly 1.8 million single people concealed within a total of nearly 1.5 million host households.
136. Across different tenures, when examining the proportions relative to the size of each tenure, the report finds that problems are more prevalent in the rented sectors, particularly the private rented sector, *‘where more than a quarter of households have some form of housing need’* (page 6).
137. In addition, when the report looks at those households with needs for whom social rent is the most appropriate tenure, 18.8% of private renting households are in this position compared to 11.6% of social renters and just 1.3% of homeowner households.
138. Within the private rented sector, affordability, unsuitability and overcrowding are the most frequent issues. In particular, the wider measure of affordability (using an additional higher threshold) shows up highly, as does the measure of unsuitability for the age and health of the occupant.

Speech by Secretary of State for Housing, Communities and Local Government to the Creating Communities Conference 2020 (September 2020)

139. The Secretary of State, Robert Jenrick, reiterated the importance of affordability in a speech he gave to the Creating Communities Conference 2020.

140. In the speech, Jenrick made clear that *'We owe it to the next generation to radically reform the existing system, so we can offer them a future where our children and grandchildren can afford to own their own home.'*

Speech by the Minister for Housing to the District Councils' Network (October 2020)

141. The Housing Minister, Christopher Pincher, gave a speech to the District Councils' Network explaining why the Government is seeking reforms to the planning system. In explaining why the Government is considering a revised methodology for calculating housing need, Pincher noted the work of KPMG and Shelter, stating that *"Local plans do not provide for the ambition we have – 300,000 new homes each year – nor enough to meet the demands of organisations and such as KPMG and Shelter, both of which say we need to be building north of 250,000 homes a year to deal with the housing challenges that we have"*.
142. Pincher also emphasised the need to address poor housing affordability, particularly that observed in the South and the South East. He explained that in calculating housing need under the Government's proposed methodology, that *"Fundamentally the initial driver, the first driver of need, must be affordability because there are parts of our country, not just in the south and the south east, where the affordability is low and people who want and need to live in a certain place and work in that place cannot afford to do so"*.

Minister of State for Housing Speech at Savills Annual Housing Seminar (24 November 2020)

143. The Housing Minister, Christopher Pincher, gave a speech to Savills Annual Housing Seminar about the government's strategy for housing.
144. The Minister made clear that the coronavirus pandemic only reinforced the need to double our efforts to build more quality homes with strong and sustainable communities, which are needed now *"more urgently than ever"*.
145. The Minister continued, that that means *"keeping up the pace on supply"* to make up for ground lost and that notwithstanding the emergency and the challenges to the economy the Government's target of building 300,000 new homes of all types and tenures each year by the middle of this decade must be met, so that people can *"afford to buy or afford to rent the sorts of homes that they want to be able to provide them with the security and the opportunity that they want and need"*.

Property Index Overview of European Residential Markets, 9th Edition, Deloitte, 2020

146. This overview report summarises housing market data for nineteen European countries including the United Kingdom. Topics discussed include new dwelling starts and new dwelling completions, and the number of existing dwellings, per 1,000 persons population. The UK performs poorly on all three matters. Just 2.65 dwellings per 1,000 population were completed in the UK in 2019; this is the seventh-lowest of any of the countries assessed. The rate of new dwelling starts is even lower, at 2.24 dwellings per 1,000 population, the fourth-lowest of the countries assessed. This is in the context of the second-lowest number of existing dwellings, with just 360.6 dwellings per 1,000 population. These data show that, by international comparison, the UK has a small existing housing stock for its population and that new dwelling starts and completions are at a comparatively low rate.

Coming Home – Tackling the housing crisis together (February 2021)

147. The report by the independent Commission on Housing, Church and Community lays out a positive vision for housing. The vision is centred on five core values, which are rooted in the Christian story but resonate with us all: good housing should be sustainable, safe, stable, sociable and satisfying.
148. At the heart of the report is the idea that simply building more houses, whilst important, is not sufficient to address the prolonged housing issues this country continues to face. The report suggests that we need more truly affordable homes and stronger communities that people can be proud of and where they can feel safe and welcome, put down roots and flourish.
149. Chapter 8 focuses on what Government can do, it recommends six actions for the Government to consider, these include, that the Government should develop a coherent, long-term housing strategy, focusing particularly on those in the greatest need. It recommends a full review of the social security system to ensure it provide adequate housing support for low- income households and that all public land should maximise its long term social, environmental and economic value, not simply be sold for the highest achievable price.
150. It is this Commission’s contention that we all need to start to think differently, and act differently, if the next 20 years are not simply to be a re-run of the last 20. It states that:
- “The housing problems in our society, which have been consistently documented for many years, must not continue to be borne solely by those living in unaffordable or*

inadequate housing, while nearly everyone else – the Church included – continues to act largely in their own interests, and effectively perpetuates this injustice”.

Secretary of State for Communities, Housing and Local Government’s speech to the National Housing Federation (25 March 2021)

151. The Secretary of State for Communities, Housing and Local Government, Robert Jenrick, addressed the National Housing Federation on the subject of *‘building back better – fairer, and safer and with opportunity for all’*.
152. Jenrick identified the need to strengthen the safety net that social housing has always provided, while also extending the ladder of opportunity that has always been there. He stated that this means *“we must ensure that more affordable and social housing gets built”* (my emphasis).
153. The Secretary of State made clear that the Government is *“determined to do all we can to support you – social landlords who make an important contribution to housing delivery – to keep up the momentum on supply” to ensure that homes are completed and that new properties are started”* (my emphasis).
154. Jenrick went on to say (referring to the Coronavirus pandemic) that what has happened over the past year has made this an *“even more urgent, even more important mission for the country”*.
155. The Secretary of State identified the opportunity for housing associations to build the homes we need, whether for rent, whether for shared ownership or indeed for outright ownership as well – and not just in urban areas.
156. Jenrick identified that from 2015 to 2019, just over 10% of new affordable homes have been built in villages accommodating around 3,000 people. He made clear that *“I’d like to go much further than that in the years ahead”*.
157. Jenrick concluded that the Government’s mission to build back better and to level up all parts of the country *“will, in no small part, be powered by the provision of more affordable housing”* (my emphasis).

Ministry of Housing, Communities and Local Government, Press Release (19 April 2021)

158. This press release outlines that a new government-backed mortgage scheme to help people with a 5% deposit buy a house (up to the value of £600,000) is now available from high street lenders across the country. It explains that when asked 69% of private

renters and 63% of those living at home who had looked into a mortgage said they cannot find many mortgages with a low deposit. The 95% mortgage scheme aims to make home ownership more accessible.

159. The Secretary of State for Communities, Housing and Local Government, Robert Jenrick stated that *“For too many people, no matter how hard they work, home ownership can seem out of reach. One of the biggest divides in our country has been between those who can afford their own home and those who cannot.”* (my emphasis).
160. Jenrick concluded that *“In recent years we’ve reversed the trend and seen a positive increase in owner-occupiers. We’re determined to build on this through the range of flexible ownership options which help ensure home ownership is achievable. We want to match the ambitions of aspiring homeowners up and down the country. Together we can turn ‘Generation Rent into ‘Generation Buy”*.
161. The press release explains that the government intervention comes as new figures published by the government show a greatly increased desire for home ownership and a sharp reduction in 95% mortgage availability over the past year.

Denied The Right to a Safe Home – Exposing the Housing Emergency, Shelter (May 2021)

162. This report by Shelter identifies what it describes as the Housing Emergency, with 1 in 3 adults (17.5 million people) being denied the right to safe home. These people are trapped by the Housing Emergency.
163. Page 4 of the Report explains that Shelter commissioned research with 13,000 people to bring to light the extent of the Housing Emergency. This found that one in seven had to cut down on essentials like food to pay the rent or mortgage and 6% lived in a home that harms their family’s physical health.
164. It goes on to identify on page 5 that the high cost of housing is the main cause of homelessness. Housing benefit was designed to ‘take the strain’ of unaffordable rents but restrictions mean it is well below what’s needed, which it describes as a *“recipe for rising poverty and homelessness”* where *“too many are forced to choose between rent and feeding their families”*.
165. It found that 14% of people saying that they regularly have to cut spending on household essentials like food or heating to pay their rent or mortgage payments.
166. The Report (on page 10) calls for the Government to commit to building at least 90,000 new social homes in England a year, making very clear that: *“Something needs to*

change. We need to end the housing emergency. We need social housing. For the thousands stuck in bad homes. For the renters terrified of losing their home. For everyone facing discrimination. For everyone denied the right to a safe home. We will only end the housing emergency by building affordable, good quality social homes”.

167. In respect of the private rented sector, Shelter identified (page 13) that as people are priced out of the housing market, the number of households renting privately more than doubled between 2000 and 2019 from 2 million to 4.4 million – or 1 in 5 of us.
168. It found that Private renters spend the most of their income on housing, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%). Furthermore, private rented homes are more likely to fail the Decent Homes Standard.
169. Shelter highlight the problems of discrimination, with landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.
- 3.62 Shelter also identifies (page 26) the benefits of social housing compared with alternative forms such as private renting. Of those privately renting, 43% of families worry about their landlord ending their contract early, and this is a constant possibility.
170. Social housing is more stable and people in social homes have longer and more secure tenancies. Families can plan for the future without fear of losing their home. Social housing is also quality controlled, being more likely to meet the standard for ‘decent’ housing. It states that a new generation of quality social homes could set the gold standard for liveable housing.
171. Shelter state that for generations, this country has failed to build enough social homes. There are over one million people in England on the waiting list, and the lack of social housing has pushed people into expensive and insecure private renting.
172. On Page 32 the Report highlights that a safe home for everyone is what Shelter fights for, but 17.5 million people are denied that right. Whether because of the cost of rent, being forced to live in unsafe conditions, or because they’ve been discriminated against because of their class, disability, gender, sexuality or race.
173. The Report concludes (page 33) that for change to happen, “*we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing*

*benefit. But when it comes down to it, there's only one way to end the housing emergency. **Build more social housing**" (emphasis in original).*

Conclusions on the National Housing Crisis

174. There is an ever-increasing wealth of evidence including from figures at the highest levels of Government that unaffordability and inability to get on the housing ladder is a significant problem.
175. What is also clear is that the messages from previous Governments have failed to ensure enough new homes, especially affordable homes, are being built.
176. The evidence is clear and, in my opinion, demonstrates the pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable.
177. Evidence suggests that failure to do so will present a risk to the future economic and social stability of the United Kingdom.

Appendix 4

The Extent of the National Shortfall in Housing Delivery



Extent of the National Shortfall in Housing Delivery

1.1 In a speech to the House of Commons on 24 October 2013 the-then Planning Minister, Nick Boles, made reference to *“the scale of the housing crisis faced by this country”* and *“the extent of the need for housing”*.

1.2 The extent of the need for housing and the scale of the crisis as a result of the persistent under delivery of both market and affordable housing in the UK is explored further in this section of my evidence, starting almost 17 years ago with Kate Barker’s Review of Housing Supply in March 2004.

The Barker Review of Housing Supply (17 March 2004)

1.3 In her 2004 review into issues underlying the lack of supply and responsiveness of the housing in the UK, Barker reported that housing is a basic human need, fundamental to our economic and social well-being. She found that:

- A weak supply of housing contributes to macroeconomic instability and hinders labour market flexibility;
- Housing has become increasingly unaffordable over time, noting that the aspiration for home ownership is as strong as ever, yet the reality is that for many this aspiration will remain unfulfilled unless the trend in real house prices is reduced;
- This brings potential for an ever widening social and economic divide between those able to access market housing and those kept out; and
- Homes are more than shelter. They provide access to a range of services and to communities. Housing also plays a major role as an asset in household’s balance sheets and in household planning for their financial futures.

1.4 Barker considered that continuing at the current rate of housebuilding was not a realistic option:

“Unless we are prepared to accept increasing problems of homelessness, affordability and social division, decline in standards of public service delivery and increasing costs of doing business in the UK – hampering our economic success”.

- 1.5 She found that whilst demand for housing is increasing over time, driven by demographic trends and rising incomes, in 2001 the construction of new houses in the UK fell to its lowest level since the Second World War.
- 1.6 A weak response of housing supply to demand changes has been one of the factors underlying the instability of the UK housing market with Barker reporting that “*there is growing evidence of a persistent inadequate supply*” noting that in the UK the trend rate of real house price growth over the past 30 years had been 2.4% compared to the European average of 1.1%
- 1.7 She found that affordability has worsened and that in 2002 only 37% of new households could afford to buy a property compared to 46% in the late 1980s. The overall objective of the Barker Review included:
- To achieve improvements in housing affordability in the market sector;
 - A more stable housing market; and
 - An adequate supply of publicly funded housing for those who need it.
- 1.8 Taking the baseline level of private sector housing built in 2002/03 of 140,000 gross starts and 125,000 gross completions, Barker estimated that:
- Reducing the trend in real house prices to 1.8% would require an additional 70,000 private sector homes per annum; and
 - More ambitiously, to reduce the trend in real house prices to 1.1% an additional 120,000 private sector homes per annum would be required.
- 1.9 Even in the case of the less ambitious price trend, Barker found that this would include pricing an additional 5,000 new households into the market each year and improving the access for the backlog of those currently priced out.
- 1.10 She found that an increase in supply of 17,000 affordable homes per annum would be required to meet the needs among the flow of new households, noting that there is also a case for the provision of up to 9,000 affordable homes per annum above this rate in order to make inroads into the backlog of need, a total of 26,000 per annum
- 1.11 Barker presented three scenarios for real house price trends ranging from slowing the rate at which households were being priced out to a long-term reduction of house price inflation:

- 2.4% per annum – which represented the Government’s target aimed at slowing the rate at which households were being priced out of the market, would have required an increase in housebuilding to 160,000 per annum;
- 1.8% per annum – to reduce the long-term trend would have required an increase in housebuilding to 200,000 per annum; and
- 1.1% per annum – which represented the EU average at the time, and which was considered would ‘improve the housing market’ would have required an increase in housebuilding to 260,000 per annum.

1.12 Meeting Barker’s most optimistic objective of improving the housing market and pricing many more households back into the marketplace would have required an estimated 260,000 homes per annum.

The Barker Review: A Decade On (24 March 2014)

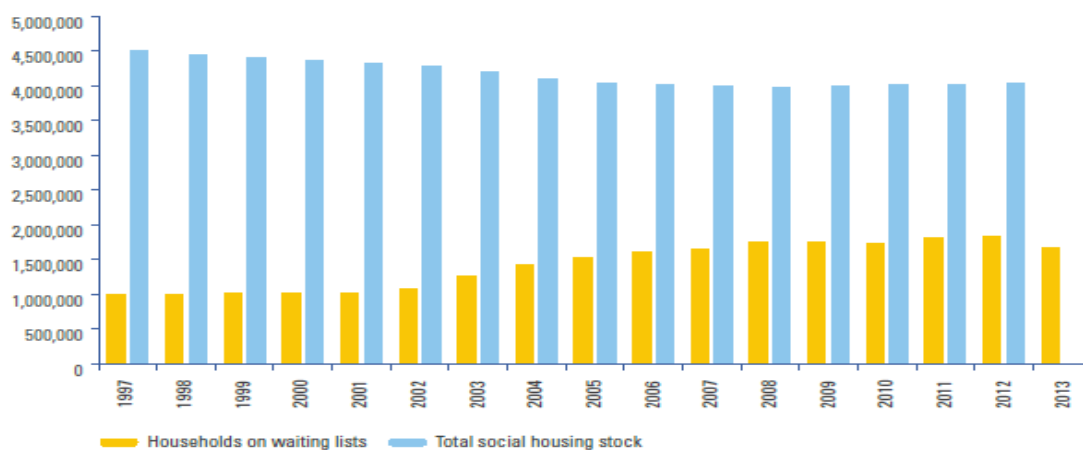
- 1.13 In March 2014, the Home Builders Federation (HBF) undertook a review of housing delivery against the findings of the Barker Review and the impacts of this upon the market and affordability. They found that by 2004 the housing crisis was already building and in the 10 years since then, even against the most modest of the housing targets identified by Barker (which was met only once in 2005/06), the average annual shortfall has been 45,000 homes.
- 1.14 Measured against the objective of improving the housing market, housebuilding had been an average of 145,000 per annum down on the target of 260,000 per annum over the period between 2004 and 2014.
- 1.15 The HBF found that when measured against the middle of Barker’s three price inflation targets for 200,000 per annum, the shortfall of homes over the decade stood at 953,000 homes in 2014. This was on top of a backlog that had already been identified as being large (estimated at between 93,000 and 146,000) and growing in 2004.
- 1.16 They reported that in 2014 even if housebuilding rose to 210,000 per annum overnight, assessed against the middle objective of reducing the long-term rate of inflation, the country would be four and a half years behind where it was in 2004.
- 1.17 In 2014, the HBF found that a decade on from the Barker Review, the UK was 1.45 million homes short of where Kate Barker projected would have brought about an improved housing market.

- 1.18 The HBF reported that a basic estimate would suggest that in order to achieve the very modest objective of slowing the increase in the affordability gap so that fewer new households are priced out of the market, in 2014 some 200,000 private household starts would be required, a figure last achieved in 1972/73.
- 1.19 It goes further to detail that the objective of improving the housing market would, in 2014, have required 320,000 private housing starts per annum, a figure achieved in England only four times since World War II.

Building the Homes We Need (April 2014)

- 1.20 The KPMG and Shelter research was intended to provide a package of new housing policies to inform the new 2015 Government.
- 1.21 It reported that each year an average of 100,000 fewer homes are built that are needed which adds to a shortfall which has been growing for decades, noting that growing demand means that without a step-change in supply we will be locked into a spiral of increasing house prices and rents, making the housing crisis worse.
- 1.22 Because of private housing becoming less affordable, the number of people in need of affordable housing has grown and with the failure of successive governments to deliver new social housing whilst existing stock continues to be depleted through the Right to Buy, waiting lists have grown whilst social housing stock has shrunk as illustrated by figure 1.1¹.

Figure 1.1: Social Housing Waiting Lists and Stock



Source: *Building the Homes We Need (2014)*

¹ Reduction in total numbers on housing waiting lists in 2013 as a result of local authorities utilising the freedoms afforded to set their own housing allocation criteria through the Localism Act.

- 1.23 KPMG and Shelter found that changing demographics meant that we need to build a minimum of 250,000 new homes per annum in England to meet rising demand. In 2013 (the most recent monitoring period available at the time of publication of the report) just 109,660 new homes were built, the lowest annual level since 1946, the year of recovery after the Second World War.
- 1.24 In addition to which the report found that estimates suggest that the backlog of housing need may be as large as two million households and that to clear this England would need to build well over 250,000 homes each year, which would require doubling current output at the time of publication of the report.

The House of Lords Select Committee on Economic Affairs: Building More Homes (15 July 2016)

- 1.25 The Select Committee found that a growing population, rising immigration and rising incomes have increased demand for housing in England in recent decades but that too few homes have been built over this period. As a result, house prices and rents have risen sharply and there has been a decline in home ownership over the past decade.
- 1.26 They considered that we must build enough homes to make housing more affordable for everyone, noting that aspirant home owners who are unable to afford a deposit pay substantial proportions of their income on rent, families on waiting lists of social housing contend with insecure tenancies and rogue landlords, and at the same time housing benefit spending has doubled in the past two decades.
- 1.27 The Lords reported that as former Housing and Planning Minister Brandon Lewis had explained to them, the Government aimed to address the problems by building one million homes by the end of Parliament. However, it was noted that since the Brexit vote the Minister had effectively abandoned this target and prior to the vote had warned that it would be difficult to achieve if the UK voted to leave the European Union.
- 1.28 In addition to this the Committee found that whilst the Government's ambition was welcomed, it must be matched by appropriate action on a much larger scale than currently envisaged and across all tenure. They considered that the Government was focused on building for home ownership and therefore neglecting housing for affordable and social rent.
- 1.29 It was reported that it had been 10 years since 200,000 homes (the implied annual rate from the Government's target) were added to the housing stock in a single year, but

the evidence suggested that this will not be enough to meet future demand and the backlog from previous years of undersupply.

- 1.30 The Select Committee found that in order to meet demand and have a moderating effect on house prices, at least 300,000 homes a year need to be built for the foreseeable future otherwise the age of a first-time buyer will continue to rise. The main conclusions of the Select Committee included that:

“The Government’s target of one million new homes by 2020 is not based on a robust analysis. To address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future. One million homes by 2020 will not be enough”.

National Housing Federation Press Release: ‘England Short of Four Million Homes’ (18 May 2018)

- 1.31 The NHF press release² reported that new figures reveal the true scale of the housing crisis in England and that the research (conducted by Heriot-Watt University) shows that England’s total housing backlog has reached four million homes.
- 1.32 They report that in order to both meet this backlog and provide for future demand, the country needs to build 340,000 homes per year until 2031, noting that this is significantly higher than current estimates which have never before taken into account the true scale of housing need created by both homelessness and high house prices.
- 1.33 However, the NHF is clear that these need to be the right type of houses with a need for 145,000 of these new homes per year to be affordable homes, compared to previous estimates of annual affordable housing need of around 78,000 homes. It reports that this means around two fifths (or 40%) of all new homes built every year must be affordable homes, yet in 2016/17 only around 23% of the total built were affordable homes.
- 1.34 The research breaks down exactly what type of affordable homes are needed:
- 90,000 per annum should be for social rent;
 - 30,000 per annum should be for intermediate affordable rent; and
 - 25,000 per annum should be for shared ownership.
- 1.35 Reference was drawn to the September 2017 announcement by the former Prime Minister Theresa May that £2 billion will be invested in affordable housing and

² <https://www.housing.org.uk/press/press-releases/england-short-of-four-million-homes/>

indicating that this could deliver around 25,000 new homes for social rent over three years, however the NHF report that even when this funding is made available, the research shows that it would deliver less than 10% of the social rented homes needed each year.

- 1.36 Government funding for social housing has been steadily declining for decades. In 1975/76 investment in social housing stood at more than £18 billion a year but had declined to just £1.1 billion in 2015/16. Over the same period, the housing benefit bill grew from £4 billion to £24.2 billion each year.
- 1.37 The NHF set out that homeownership rates have plummeted among young people, rough sleeping has risen by 169% since 2010 and that unless the Government takes steps to deliver more private, intermediate and social housing, the number of households in temporary accommodation is on track to reach 100,000 by 2020.
- 1.38 A series of quotes accompany the NHF press release from senior industry professionals, summaries of which are detailed below:
- David Orr, Chief Executive of the NHF – *“This ground-breaking new research shows the epic scale of the housing crisis in England”.*
 - Jon Sparkes, Chief Executive of Crisis – *“Today’s findings are stark and shocking, but they also represent a huge opportunity for us as a country to get to grips with our housing and homelessness crisis – and to end it once and for all”.*
 - Terrie Alafat CBE, Chief Executive of the Chartered Institute of Housing – *“This new report once again highlights the chronic housing shortage we face in the UK and it is clear that only a bold and ambitious plan to solve the housing crisis will prevent a decent, genuinely affordable homes being out of reach for our children and their children.”*
 - Campbell Robb, Chief Executive of the Joseph Rowntree Foundation – *“It is unacceptable that currently in our society millions of people are locked out of being able to afford a decent and secure home. For years our failure to deliver enough affordable housing in England has led to rising levels of poverty and homelessness across our country.”*
 - Polly Neate, Chief Executive of Shelter – *“We are in the midst of a housing emergency where an entire generation faces a daily struggle for a decent home...Government can turn things around but only by building many more of the high quality, genuinely affordable homes this country is crying out for”.*

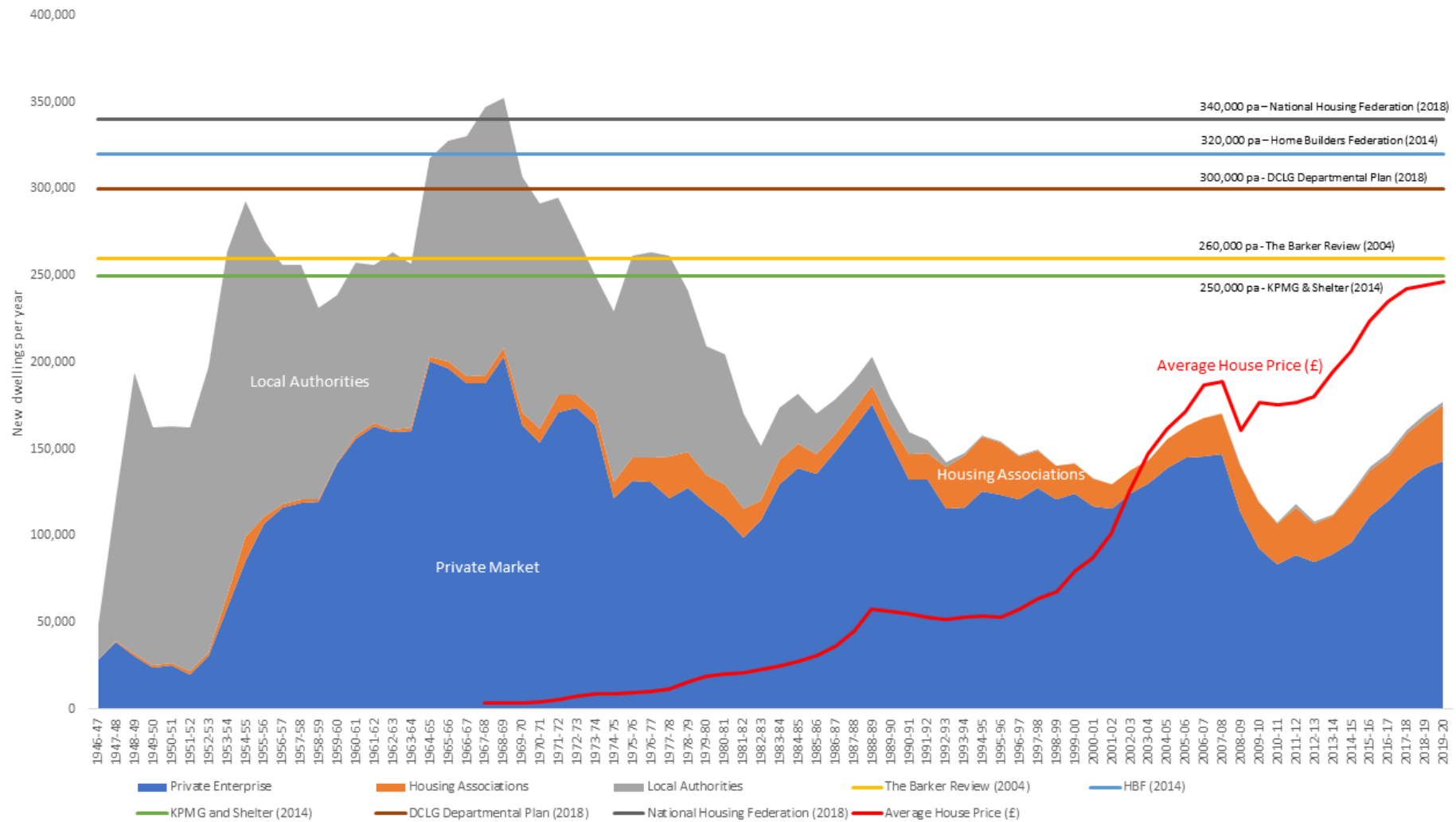
Ministry of Housing, Communities and Local Government Single Departmental Plan (27 June 2019)

- 1.39 The Ministry's Single Departmental Plan outlines its objectives which include to "*deliver the homes the country needs*" and to "*make the vision of a place you call home a reality.*"
- 1.40 Under the objective of delivering the homes the country needs, the Plan states that the Ministry will:
- "Support the delivery of a million homes by the end of 2020 and half a million more by the end of 2022 and put us on track to deliver 300,000 net additional homes a year on average by the mid-2020s, to help increase affordability."*
- 1.41 The Departmental Plan clearly outlines the Government's aim to deliver 300,000 new homes per annum in order to address the housing crisis in England.

The National Housing Shortfall

- 1.42 Over the course of the past 17 years a series of industry leading professionals and figures at the highest level of Government have identified that there is a need for between 200,000 to 340,000 homes per annum to address the housing crisis that has engulfed the country.
- 1.43 Figure 1.2 below illustrates the level of house building in England between 1946 and 2017 and compares delivery over this period with the range of annual housing needs identified between 2004 and 2020, the most recent of which of course being the Government's own Ministry for Housing, Communities and Local Government (MHCLG) target for 300,000 new homes per annum.

Figure 1.2: House Building in England 1946 to 2019



Source: MHCLG Live Table 209; MHCLG Live Table 253; HM Land Registry (2018); The Barker Review (2004); HBF (2014); Building the Homes We Need, KPMG & Shelter (2014); MHCLG Single Departmental Plan (2019); NHF (18 May 2018).

- 1.44 Figure 1.2 shows that the Government's current target of 300,000 new homes per annum is a figure that the country has not seen achieved since the mid to late 1960s. Whilst housing completions have been increasing since around 2011, they are still a long way short of meeting the level of housing delivery that is desperately needed to address the housing crisis in this country.
- 1.45 At Figure 1.3 net additional dwellings in England since 2004 sourced from MHCLG Live Table 122 are compared with the annual need figures identified in the Barker Review (2004), the KPMG & Shelter research (2014), the HBF research (2014), the NHF research (2018), and the MHCLG Single Departmental Plan (2019).
- 1.46 The results are stark. The lowest of the annual need figures since 2004, that of the KPMG/Shelter report of 250,000 homes per annum, results in a shortfall of -1,105,490 homes in the past 17 years. To put this into context, this is equivalent to:
- 95% of the total number of households on local authority Housing Registers in the whole of England³; and
 - Almost four times the total number of homes across the entire County of Oxfordshire⁴.
- 1.47 At the other end of the scale, the need for 340,000 homes per annum most recently identified in the NHF research results in a shortfall figure of -2,635,490 homes. This is equivalent to more than twice the total number of homes in the entire West Midlands region⁵.
- 1.48 When the Government's most recently published target of 300,000 home per annum taken from the MHCLG 2018 Single Departmental Plan is used for comparison, there has been a shortfall of -1,955,490 homes since 2004. To put this into context, this is equivalent to:
- More than 1.6 times the number of households on local authority Housing Registers in the whole of England (see footnote 3); and
 - More than one-and-a-half times the total number of homes in Greater Manchester⁶.

³ Source: MHCLG Live Table 600 – 1,159,833 households on Housing Registers in England at 1 April 2019

⁴ Source: MHCLG Live Table 100 – 295,517 homes in Oxfordshire at 1 April 2019

⁵ Source: MHCLG Live Table 100 – 1,174,904 homes in West Midlands at 1 April 2019

⁶ Source: MHCLG Live Table 100 – 1,223,807 homes in Greater Manchester Metropolitan County at 1 April 2019

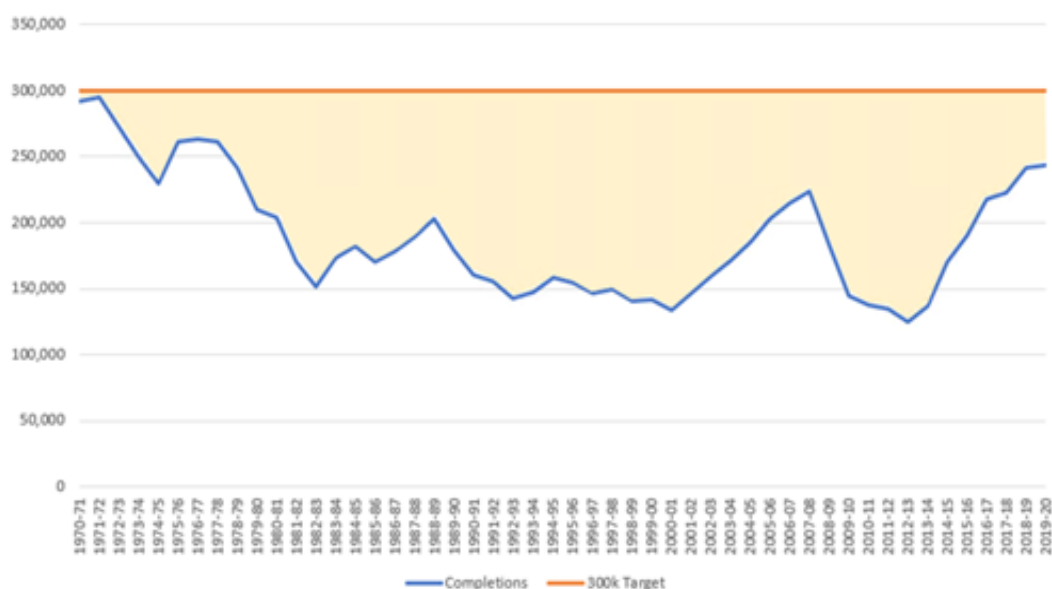
Figure 1.3: National Housing Shortfall Comparison

Year	Net Additions	KPMG/Shelter (2014) 250,000 pa		Barker Review (2004) 260,000 pa		MHCLG Departmental Plan (2019) 300,000 pa		The HBF (2014) 320,000 pa		NHF Research (2018) 340,000 pa	
		Annual	Cumulative	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative
03/04	170,969	-79,031	-79,031	-89,031	-89,031	-129,031	-129,031	-149,031	-149,031	-169,031	-169,031
04/05	185,553	-64,447	-143,478	-74,447	-163,478	-114,447	-243,478	-134,447	-283,478	-154,447	-323,478
05/06	202,653	-47,347	-190,825	-57,347	-220,825	-97,347	-340,825	-117,347	-400,825	-137,347	-460,825
06/07	214,936	-35,064	-225,889	-45,064	-265,889	-85,064	-425,889	-105,064	-505,889	-125,064	-585,889
07/08	223,534	-26,466	-252,355	-36,466	-302,355	-76,466	-502,355	-96,466	-602,355	-116,466	-702,355
08/09	182,767	-67,233	-319,588	-77,233	-379,588	-117,233	-619,588	-137,233	-739,588	-157,233	-859,588
09/10	144,870	-105,130	-424,718	-115,130	-494,718	-155,130	-774,718	-175,130	-914,718	-195,130	-1,054,718
10/11	137,394	-112,606	-537,324	-122,606	-617,324	-162,606	-937,324	-182,606	-1,097,324	-202,606	-1,257,324
11/12	134,896	-115,104	-652,428	-125,104	-742,428	-165,104	-1,102,428	-185,104	-1,282,428	-205,104	-1,462,428
12/13	124,722	-125,278	-777,706	-135,278	-877,706	-175,278	-1,277,706	-195,278	-1,477,706	-215,278	-1,677,706
13/14	136,605	-113,395	-891,101	-123,395	-1,001,101	-163,395	-1,441,101	-183,395	-1,661,101	-203,395	-1,881,101
14/15	170,693	-79,307	-970,408	-89,307	-1,090,408	-129,307	-1,570,408	-149,307	-1,810,408	-169,307	-2,050,408
15/16	189,645	-60,355	-1,030,763	-70,355	-1,160,763	-110,355	-1,680,763	-130,355	-1,940,763	-150,355	-2,200,763
16/17	217,345	-32,655	-1,063,418	-42,655	-1,203,418	-82,655	-1,763,418	-102,655	-2,043,418	-122,655	-2,323,418
17/18	222,281	-27,719	-1,091,137	-37,719	-1,241,137	-77,719	-1,841,137	-97,719	-2,141,137	-117,719	-2,441,137
18/19	241,877	-8,123	-1,099,260	-18,123	-1,259,260	-58,123	-1,899,260	-78,123	-2,219,260	-98,123	-2,539,260
19/20	243,770	-6,230	-1,105,490	-16,230	-1,275,490	-56,230	-1,955,490	-76,230	-2,295,490	-96,230	-2,635,490
Total Shortfalls Since 2004 compared to:		KPMG/Shelter Research	-1,105,490	The Barker Review	-1,275,490	MCHLG Departmental Plan	-1,955,490	The HBF	-2,295,490	NHF Research	-2,635,490

Source: MHCLG Live Table 122; HM Land Registry; The Barker Review (2004); HBF (2014); Building the Homes We Need, KPMG & Shelter (2014); NHF (18 May 2018); MHCLG Single Departmental Plan (2019)

- 1.49 It is widely accepted that 300,000 new homes are needed per annum and have been for quite some considerable time as set out above. The last time the country built more than 300,000 homes was in 1969. Since that time there is an accumulated shortfall of 5,542,181. This shortfall is set out in Figure 1.4 below.

Figure 1.4 National Housing Shortfall since 1970/71



Source: MHCLG Live Tables 122 and 209

Conclusion on the Extent of the National Housing Shortfall

- 1.50 The evidence before the Inspector shows that in every scenario, against every annual need figure, the extent of the shortfall in housing delivery in England is staggering and merely serves to further compound the acute affordability problems that the country is facing.

It is my view that what is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is absolutely essential to arrest the housing crisis and prevent further worsening of the situation.

Appendix 5

'Over 80,000 new homes will be lost in one year to Covid chaos' (June 2020)

[View our coronavirus \(COVID-19\) housing advice](#)

Posted 30 Jun 2020

Over 80,000 new homes will be lost in one year to Covid chaos

Shocking new analysis predicts the pandemic will see 84,000 fewer homes delivered this year – with overall output dropping from 255,000 last year to just 171,000 homes in 20/21.

Without urgent government action, the research carried out by Savills for Shelter, estimates 116,000 construction jobs could be lost by 2020/21 as housebuilding stalls. Under the worst-case scenario, the report also shows the government will fall significantly below its own housebuilding targets, with as many as 318,000 new homes lost over the next five years.

Savills suggests an initial dip in housebuilding will be down to necessary social distancing on building sites reducing capacity. With further decreases then triggered by the reduced demand for market sale homes and a heavy reliance on private instead of social housebuilding, at a time when the country is entering a protracted recession.

With the Prime Minister about to promise he will *'build, build, build'*, Shelter is warning that the housebuilding slump will have dire consequences for the provision of new housing, including much-needed social homes. Unless the government intervenes, a paltry 4,300 social rent homes could be delivered in this financial year, a catastrophic yearly drop of 30%.

This would be the lowest number of social homes built in any year since WW2 – striking a devastating blow for the million plus households stuck on social housing waiting lists across England. Just over 4,000 social homes would not even be enough to house those families currently waiting for a social home in Wakefield, never mind the rest of the country.

Amid fears of rising unemployment and homelessness, Shelter is urging the government to bring forward the £12.2 billion already promised to be spent over the next five years under the *Affordable Homes Programme*. By fast-tracking the cash and spending it in just two years on building social homes it could plug the gap and save tens of thousands of jobs.

Polly Neate, chief executive of Shelter, said: "As the government prepares a major push on infrastructure and investment, it has a perilously short window to avert a lengthy housebuilding crash that will wipe out tens of thousands of new homes and jobs. By bringing forward planned spending and building social housing the government has the chance to avert disaster.

"There are over a million households on social housing waiting lists, and even more likely to join them as the recession bites – making the case for social homes self-evident. The pandemic has shown that a safe home is fundamental, but just not enough people have one.

"As part of the Prime Minister's 'build, build, build' speech tomorrow, he should bring forward the spending promised under the Affordable Homes Programme. This would stimulate the economy, save jobs, and most importantly provide the social homes we urgently need. We can and we must build this country back better."

Need to contact the media team?

These numbers for media enquiries only. We cannot give housing advice on these lines. [Click here to contact a housing advisor.](#)

Call us: [0344 515 2162](tel:03445152162)
Monday to Friday 9:30 to 5:30
[07850 901 142](tel:07850901142) out of hours
media enquires
Or you can [email us](#)

Over 80,000 new homes lost in one year to Covid chaos - Shelter and Savills research (June 2020)

Notes to editor:

- Savills conducted their independent analysis of the impact of the Covid-19 pandemic on housing supply, using Oxford Economics forecasts as at 31st May. Under the baseline scenario, GDP is expected to fall 8.3% this year with a strong rebound in 2021. On the downside, it assumes the UK economy would suffer a deeper recession in 2020 and the subsequent recovery would be slower, with quarterly economic output only returns to pre-Covid levels by mid-2023. Both assume an orderly Brexit in December.
- The analysis compares expected demand for new build homes, with Governments stated target of achieving 300,000 net additional dwellings per annum by the middle of this decade.
- Savills estimates housing delivery in England in 2019/20 in 255,000 using new Energy Performance Certificates issued.
- A selection of summary results are presented below.

Number of homes lost under each scenario compared to pre-Covid Government target scenario – over five years 2020-21 to 2024-25

	all homes lost		Affordable homes lost		Social rent lost	
	Number	Prop.	Number	Prop.	Number	Prop.
baseline	218,000	15%	41,000	13%	4,600	14%
upside	125,000	9%	25,000	8%	2,700	8%
downside	318,000	23%	66,000	21%	7,900	23%

Source, Savills analysis

Number of homes supplied under each scenario in 2020-21 and the overall loss compared with 2019-20 delivery

	All additional homes	Loss vs 2019-20 delivery (255,000)	Affordable Homes	Social homes
2019/20	255,000	N/A		
baseline	171,000	-84,000	41,000	4,300
upside	175,000	-80,000	41,000	4,400
downside	130,000	-125,000	35,000	3,500

Source, Savills analysis

- Savills estimates the total new build supply for 2019/20 will be 255,000 of which 10% would come from change of use and conversions. In 2018/19 new build properties accounted for 214,000 units in MHCLG's net additional dwellings statistics (Table 118)
- Savills also estimated the loss of Affordable Housing Supply. Over five years Savills downside projection expects Affordable supply to drop by as much as 66,000 of which 7,900 would have been Social Rent.
- Full details of their model assumptions are in their report Impact of Covid-19 on social housing supply and residential construction
- Shelter's estimation of Social Homes is based on NHF's 2019 report "Capital grant required to meet social housing need in England 2021 – 2031"

Appendix 6

Home Truths: South West (September 2020)





Home Truths

The housing crisis in the South West

Created in September 2020

Solving the housing crisis

Housing associations are united by a single purpose – to ensure everyone in the country can live in a quality home that they can afford.

We meet shifting housing needs by building more homes, by providing extra support when it's needed and by innovating to tackle the challenges people face.

We generate income which doesn't go to shareholders so we can reinvest all our profits in homes and communities. That's what we have always done; it's what we will always do.

If you share our sense of purpose, we want to work with you. If you want to end the housing crisis, you need to work with us.

	South West	England
Unemployment rate in 2018/19	3%	4.1%
Percent of Housing Benefit claimants in employment in 2018/19	18.4%	20.7%
Mean annual earnings in 2018/19	£26,946	£30,170
Mean monthly private sector rents in 2018/19	£784	£858
Ratio of house prices to incomes in 2018/19	11	10

South West	Long term empty homes in 2018 ¹	Average (mean) house prices in 2018/19 ²	Percent of Housing Benefit claimants in employment in 2018/19 ³	Income required for 80% mortgage in 2018/19 ⁴	Ratio of house prices to incomes in 2018/19 ⁵	Mean annual earnings in 2018/19 ⁶	Mean monthly private sector rents in 2018/19 ⁷	Second homes in 2018 ⁸	Shortfall in new homes (cumulative 5 years) ⁹	Total housing association affordable homes in 2018/19 ¹⁰	Unemployment rate in 2018/19 ¹¹
England	216,186	£303,006	20.7%	£69,259	10	£30,170	£858	252,630	482,905	2,753,583	4.1%
South West	19,148	£290,735	18.4%	£66,454	11	£26,946	£784	46,444	21,597	261,214	3%
Bath and North East Somerset UA	605	£400,871	16.8%	£91,628	14	£29,260	£1,288	812	0	12,208	2.6%
Bournemouth UA	998	£283,757	20.8%	£64,859	0	£0	£848	5,213	2,700	4,058	0%
Bristol, City of UA	775	£311,120	19.6%	£71,113	11	£29,130	£1,070	2,355	5,892	14,118	3.8%
Cornwall UA	2,742	£262,749	19.4%	£60,057	11	£23,176	£693	14,015	2,911	24,269	2.7%
Isles of Scilly UA	9	£361,240	0%	£82,569	15	£23,800	£808	101	0	61	0%
North Somerset UA	216	£296,078	15.9%	£67,675	10	£29,115	£774	421	3,384	9,439	2.8%
Plymouth UA	715	£197,848	14.7%	£45,222	8	£24,903	£569	870	0	23,829	4.5%
Poole UA	514	£373,580	21.6%	£85,390	0	£0	£872	0	2,069	3,300	0%
South Gloucestershire UA	508	£296,482	23.1%	£67,767	11	£27,253	£977	99	0	13,584	3.1%
Swindon UA	484	£249,366	12.8%	£56,998	9	£29,422	£698	188	3,041	6,384	3.7%
Torbay UA	1,303	£220,267	18.2%	£50,347	10	£23,197	£624	1,541	737	6,041	3.6%
Wiltshire UA	1,640	£310,264	18.8%	£70,918	11	£28,028	£812	1,560	0	27,498	2.8%
Devon	2,384	£290,510	19.1%	£66,402	12	£24,934	£762	11,561	208	31,790	2.5%
East Devon	377	£319,569	22.1%	£73,044	12	£26,666	£728	2,476	0	3,116	1.9%
Exeter	400	£278,331	18.6%	£63,618	11	£26,374	£976	541	331	4,933	3.1%
Mid Devon	113	£264,928	12.9%	£60,555	10	£25,709	£675	232	208	1,699	2.5%
North Devon	600	£261,109	17.1%	£59,682	12	£21,741	£635	1,666	153	5,021	2.1%
South Hams	194	£367,604	20.8%	£84,024	16	£23,369	£786	3,730	0	5,079	2%
Teignbridge	338	£278,116	20.9%	£63,569	11	£24,939	£712	1,390	0	6,332	2.2%
Torrige	264	£239,243	16.7%	£54,684	10	£24,268	£607	992	240	3,000	2.1%
West Devon	98	£279,309	21.4%	£63,842	11	£24,461	£660	534	662	2,610	2.3%
Dorset	1,391	£327,837	19.5%	£74,934	0	£0	£821	1,969	1,798	24,826	2.4%
Christchurch	134	£373,129	18.3%	£85,287	0	£0	£924	1,969	610	2,732	0%
East Dorset	222	£388,730	21.1%	£88,853	0	£0	£943	0	710	3,409	0%
North Dorset	226	£295,303	18.6%	£67,498	0	£0	£785	0	17	4,530	0%
Purbeck	168	£342,399	23.4%	£78,263	0	£0	£825	0	0	2,617	0%
West Dorset	389	£328,238	18.5%	£75,026	0	£0	£821	0	587	7,084	0%
Weymouth and Portland	252	£243,145	18.8%	£55,576	0	£0	£670	0	0	4,454	0%
Gloucestershire	2,815	£304,865	18%	£69,683	11	£28,532	£767	3,888	1,555	31,748	1.9%
Cheltenham	416	£332,953	17.6%	£76,104	10	£32,583	£808	942	1,670	2,817	2.8%
Cotswold	481	£422,957	18%	£96,676	14	£30,753	£939	1,714	0	6,867	2.6%
Forest of Dean	424	£253,885	15.7%	£58,031	9	£27,986	£630	313	0	5,287	2.8%
Gloucester	650	£211,127	19.2%	£48,258	8	£25,412	£661	176	814	8,747	3.2%
Stroud	611	£311,074	15.9%	£71,103	11	£27,284	£739	520	371	2,117	2.3%
Tewkesbury	233	£303,598	21.4%	£69,394	11	£27,498	£744	223	0	5,913	2.6%
Somerset	2,049	£262,228	15.3%	£59,938	10	£26,234	£669	1,851	0	28,061	3.1%
Mendip	480	£305,952	15.7%	£69,932	11	£27,711	£711	357	0	6,914	3.6%
Sedgemoor	236	£240,821	14.7%	£55,045	9	£26,874	£649	705	215	3,522	3.6%
South Somerset	657	£252,861	16.4%	£57,797	10	£25,615	£655	789	378	11,723	2.7%
Taunton Deane	453	£253,057	14.5%	£57,842	0	£0	£681	0	0	3,378	0%
West Somerset	223	£275,594	14%	£62,993	0	£0	£660	0	6	2,524	0%

1. MHCLG - Table 615 Vacant Dwellings by LA district. Date range: Oct 2004-Oct 2018. Next update Apr 2020.
2. ONS - HPSSA Dataset 12a. Date range: 95/96-18/19. Next update: Sept 2020. PLEASE NOTE: DATES ARE FINANCIAL YEAR (2018=2018/19).
3. Calculated from DWP - Stat-Xplore. Date range: 08/09-18/19. Next update: Aug 2020. PLEASE NOTE: DATES ARE FINANCIAL YEAR (2018=2018/19).
4. National Housing Federation analysis. Date range 95/96-18/19. Next update: Sept 2020. PLEASE NOTE: DATES ARE FINANCIAL YEAR (2018=2018/19).
5. National Housing Federation analysis. Date range 01/02-18/19. Next update: Oct 2020. PLEASE NOTE: DATES ARE FINANCIAL YEAR (2018=2018/19).
6. ONS - ASHE Table 8. Date range: 01/02-18/19. Next update: Oct 2020. PLEASE NOTE: DATES ARE FINANCIAL YEAR (2018=2018/19).
7. Valuation Office Agency - Private Rental Market. Date range: 10/11-18/19. Next update: Nov 2020. PLEASE NOTE: DATES ARE FINANCIAL YEAR (2018=2018/19).
8. MHCLG - Council Taxbase: LA level data. Date range: September 2010 - September 2019. Next update Nov 2020.
9. National Housing Federation analysis, based on TCPA 'New estimates of housing requirements in England 2012-2037'.
10. Homes England - Statistical Data Return 2019. Date range: 11/12-18/19. Next update Oct 2020. PLEASE NOTE: DATES ARE FINANCIAL YEAR (2018=2018/19).
11. ONS - NOMIS model-based estimates. Date range: 04/05-18/19. Next update: Jul 2020. PLEASE NOTE: DATES ARE FINANCIAL YEAR (2018=2018/19).