

Affordable Housing Proof of Evidence of James Stacey BA (Hons) DipTP MRTPI

Land to North of Little Green Lane, Croxley Green

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Outline Application: Construction of up to 600 residential dwellings (Use Class C3(a)), a 5-bedroom property for children's social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and café provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (All matters are reserved except for vehicular access).

Land to North of Little Green Lane, Croxley Green, Rickmansworth, WD3 3SR

Richborough

July 2026

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TETLOW KING PLANNING
UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL, BS16 5EL
Tel: 0117 9561916 Email: all@tetlow-king.co.uk

www.tetlow-king.co.uk

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Appendices

Appendix JS1	FOI Correspondence (28 April, 6 May, 12 and 23 June 2026, 29 May, 13 June 2024)
Appendix JS2	Relevant NPPF Extracts
Appendix JS3	Planning Practice Guidance Extracts
Appendix JS4	Relevant Written Ministerial Statement Extracts
Appendix JS5	Summary of the National Housing Crisis
Appendix JS6	Corporate Documents Summary
Appendix JS7	Affordable Housing as a Separate Material Consideration

Core Documents

CD7.1	Three Rivers Core Strategy (2011)
CD7.2	Three Rivers Development Management Policies (2013)
CD7.3	Matthew Pennycook MP Intervention Letter (18 March 2026)
CD7.4	Sarratt Neighbourhood Plan (2025)
CD7.5	Three Rivers Affordable Housing Supplementary Planning Document (2011)
CD7.6	Three Rivers Corporate Framework 2026 – 2029
CD7.7	Three Rivers Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028
CD7.8	Three Rivers Temporary Accommodation Placement Policy (December 2018, reviewed May 2024)
CD7.9	London Commuter Belt (West) Sub-Region Strategic Housing Market Assessment (2008) (published 2010)
CD7.10	South West Herts Local Housing Needs Assessment Update (2024)
CD5.2	Appeal decision: Sondes Place Farm, Dorking (November 2023)
CD7.11	Five Year Housing Land Supply Update (April 2026)
CD4.2	Decision Notice (30 January 2026)
CD4.4	Committee Report (22 January 2026)
CD8.4	Three Rivers Statement of Case
CD8.5	Croxley Green Parish Statement of Case
CD5.3	Appeal decision: Hawkhurst, Kent (March 2022)
CD7.12	“Social and Affordable Housing Renewal” Written Ministerial Statement (2 July 2025)
CD7.13	“Building the Homes We Need” Written Ministerial Statement (30 July 2024)
CD7.14	“Building the Homes We Need” Written Ministerial Statement (12 December 2024)
CD7.15	“Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing” Written Ministerial Statement (12 February 2025)
CD7.16	House of Commons Debate (24 October 2013)
CD7.17	Bleak Houses: Tackling the Crisis of Family Homelessness in England (August 2019)
CD7.18	Denied the Right to a Safe Home – Exposing the Housing Emergency (May 2021)
CD7.19	Unlocking Social Housing: How to fix the rules that are holding back building (April 2022)
CD5.4	Land rear of 17-49 Church Lane, Sarratt (3 May 2024)

Executive Summary

- i. This 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 Three Rivers District Council area.
- ii. The proposed development is for up to 600 dwellings, of which 50% (up to 300 dwellings) are to be provided on-site as affordable housing. This level of provision exceeds the requirements of Affordable Housing Policy CP4 (45%) of the adopted Core Strategy (2011) and meets the NPPF Golden Rules requirements.
- iii. The affordable housing tenure mix reflects the Emerging Local Plan, proposing 70% for Rent (comprised 70% Social Rent (147 units) and 30% Affordable Rent (63 units)) and 30% Affordable Home Ownership (90 units).
- iv. The affordable housing provision and delivery will be secured through a Section 106 agreement.

Key Findings

Corporate Documents

- v. Corporate documents identify the delivery of affordable housing as a high corporate priority of Three Rivers. These include:
 - Three Rivers Corporate Framework 2026 – 2029 (**CD7.6**);
 - Three Rivers Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028 (**CD7.7**); and
 - Three Rivers Temporary Accommodation Placement Policy (December 2018, reviewed May 2024) (**CD7.8**).

Affordable Housing Needs

- vi. The 2008 SHMA forms part of the housing evidence base for the adopted Three Rivers Core Strategy (2011). The 2008 SHMA identified a net need for 1,200 affordable rented homes and an additional 3,100 intermediate affordable homes between 2007/08 and 2020/21 in Three Rivers District; a total of 4,300 net affordable homes. Aggregated on a per annum basis over the 14-year period, this gives a net affordable housing need

figure of **307¹ affordable homes per annum** in Three Rivers District between 2007/08 and 2020/21.

- vii. Given that the 2008 SHMA is almost 2 decades old and is also now time expired it cannot be used for assessing current and on-going affordable housing need in Three Rivers.
- viii. Whereas the 2024 South West Hertfordshire Local Housing Needs Assessment ("LHNA") currently provides the most up to date assessment of affordable housing needs in Three Rivers District and was produced following the revisions to the NPPF definition of affordable housing, to inform the emerging plan.
- ix. Table 7.10 on page 100 of the 2024 LHNA identifies a net need for **364 affordable/social rented homes per annum** in Three Rivers District between 2021 and 2041, equivalent to 7,280² net affordable/social rented dwellings over the 20-year period.
- x. Table 7.42 on page 119 of the 2024 LHNA identifies a net need for **163 affordable home ownership homes per annum** in Three Rivers District between 2021 and 2041, equivalent to 3,260³ net affordable/social rented dwellings over the 20-year period.
- xi. Combining the affordable/social rented need and the home ownership need figures, the 2024 LHNA identifies a net need for **527⁴ affordable homes per annum** over the 2021 to 2041 period, equivalent to a total of 10,540⁵ net affordable dwellings over the 20-year period.

Affordable Housing Delivery

- xii. Between the start of the Local Plan period in 2001/02 and 2024/25, the Council has added just 33 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 15% of the total average number of net housing completions.
- xiii. Furthermore, there have been zero affordable housing completions in Chorleywood North & Sarratt Ward in the 24-year period between 2001/02 and 2023/24.
- xiv. Over the 2008 SHMA's full assessment period from 20007/08 to 2020/21, affordable housing additions (net of Right to Buy) averaged 41 net affordable dwellings per

¹ $4,300/14 = 307.14$

² $364 \times 20 = 7,280$

³ $163 \times 20 = 3,260$

⁴ $364 + 163 = 527$

⁵ $527 \times 20 = 10,540$

annum, against a need of 307 net affordable dwellings per annum, equating to just 13% of identified needs. A shortfall of 3,724 affordable dwellings arose over the 14-year period, equivalent to an average annual shortfall of -266 affordable dwellings.

- xv. Since the start of the 2024 LHNA period in 2021/22, affordable housing additions (net of Right to Buy) have averaged just 29 net affordable dwellings per annum, against a need of 527 net affordable dwellings per annum. A shortfall of 1,992 affordable dwellings has therefore arisen over the four-year period, equivalent to an average annual shortfall of -498 affordable dwellings.
- xvi. Between 2021/22 and 2024/25, only 6% of the affordable housing need identified by the 2024 LHNA was met. This means that 94% of households in affordable housing need had their needs go unmet. This is a very bleak situation for these households in need of an affordable home.

Affordability Indicators

- xvii. The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Three Rivers for any household seeking an affordable home:

Housing Register

- The Council's FOI response (**Appendix JS1**) confirms that on 31 March 2026 there were 946 households on the Housing Register.

Housing Register Bids and Lettings

- The Council's FOI response (**Appendix JS1**) confirms that there was just one affordable dwelling advertised for let in Chorleywood North & Sarratt Ward in the 2025/26 monitoring period. This was a 1-bed affordable dwelling that received 25 bids from households in affordable housing need.

Temporary Accommodation

- The Council's FOI response (**Appendix JS1**) sets out that on 31 March 2026, there were 44 households housed in temporary accommodation within the Three Rivers District region. Three Rivers District Council has a responsibility to house these households.
- Furthermore, an additional two households were housed in temporary accommodation outside the Three Rivers District region on 31 March 2026.

- MHCLG data indicates that Three Rivers spent £332,000 on temporary accommodation spends in 2025.

Homelessness

- MHCLG statutory homelessness data shows that in the 12 months between 1 April 2025 and 31 March 2026, the Council accepted 229 households in need of homelessness prevention duty⁶, and a further 66 households in need of relief duty⁷ from the Council.

Private Rental Market

- Office for National Statistics (“ONS”) data (first produced in 2014/15) shows that average (mean) private rents in Three Rivers stood at £1,807 per calendar month (“pcm”) in 2025/26. This represents a 49% increase from 2014/15 where average private rents stood at £1,212 pcm.
- An average rent of £1,807 pcm in 2025/26 is 42% higher than the East of England figure of £1,274 pcm and 26% higher than the national figure of £1,434 pcm.

Lower Quartile House Prices

- The ratio of lower quartile house price to incomes in Three Rivers in 2025 stood at **12.70**, an 82% increase since the start of the Core Strategy period in 2001/02 when it stood at 6.98.
- The lower quartile ratio in Three Rivers stands substantially above the national average of 6.98 (+82%) and significantly above the Region average of 8.76 (+45%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.
- The lower quartile house price across Three Rivers has risen by 237% from £115,750 in 2001 to £390,000 in 2025. This compares to a 297% increase across the East of England and a national increase of 268% over the same period.
- In 2025 lower quartile house prices in Three Rivers (£390,000) were 55% higher than across the East of England (£252,000) and 93% higher than the national figure (£202,000).

⁶ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

⁷ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

- The lower quartile house price across MSOA 'Three Rivers 003' (within which the site lies) has risen by 266% from £159,000 in 2001 to £582,500 in 2025. This figure is 49% higher than the Three Rivers figure of £390,000, and 131% higher than the East of England figure of £252,000.

The Future Supply of Affordable Housing

- xviii. I consider that any shortfall in affordable housing delivery should be dealt with within the next five years. This is also an approach set out within the PPG⁸ and has been endorsed at an appeal, where I presented evidence. When the -1,992 affordable housing shortfall is factored into the 2024 LHNA identified need of 527 affordable homes per annum for the period 2021/22 and 2040/41, the number of affordable homes the Council will need to complete increases by 76% to 925 net affordable homes per annum over the period.
- xix. The Council published its latest Five-Year Housing Land Supply Update in April 2026 (**CD7.11**), covering the period 1 April 2025 to 31 March 2030. Generously assuming all sites in the in the 5YHLS would provide policy compliant levels of affordable housing (45%) there is a possible supply of just 107 new affordable dwellings per annum. If we were to assume that the past gross affordable housing provision of 24% is to be continued over the next five years, this is likely to deliver a much lower affordable housing future supply of just 57 new affordable dwellings per annum.
- xx. Both figures fall very substantially short of the 925 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach as well as the 527 net affordable housing needs per annum identified in the 2024 LHNA.

Conclusion

- xxi. In light of the key findings of my evidence and the persistent, acute and on-going need for affordable housing within Three Rivers, I consider that **very substantial weight** should be attributed to the delivery of up to 300 affordable homes through the appeal scheme in the planning balance.

⁸ Paragraph: 022 Reference ID: 68-031-20190722

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by **James Stacey BA (Hons) DipTP MRTPI** of **Tetlow King Planning** on behalf of **Richborough**.
- 1.2 The proposed development is for up to 600 dwellings, of which 50% (up to 300 dwellings) are to be provided on-site as affordable housing. This level of provision exceeds the requirements of Affordable Housing Policy CP4 (45%) of the adopted Core Strategy (2011) and meets the NPPF Golden Rules requirements.
- 1.3 The application originally proposed 50% Affordable Housing comprising 70% Social Rent (210 units), 25% First Homes (75 units) and 5% Shared Ownership (15 units). However, the revised NPPF (2024) removed the requirement to provide 25% First Homes, and so the application was revised to remove the provision of First Homes.
- 1.4 The affordable housing tenure mix reflects the Emerging Local Plan, proposing 70% for Rent (comprised 70% Social Rent (147 units) and 30% Affordable Rent (63 units)) and 30% Affordable Home Ownership (90 units).
- 1.5 The provision and delivery of the proposed affordable housing will be secured by way of a Section 106 planning obligation.
- 1.6 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision⁹ considering evidence of need in the area.
- 1.7 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 (“RTPI”).
 - I have over 30 years professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and been in private practice since 2001.

⁹ For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

- During my career I have presented evidence at more than 180 Section 78 appeal inquiries and hearings, including in Three Rivers. I act for a cross-section of clients and advise upon a diverse range of planning housing related matters.
- In December 2022, I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.
- Both Tetlow King 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 plan documents and supplementary planning documents on affordable housing throughout the UK.

1.8 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

"The evidence which I have prepared and provide for this appeal in this Proof of Evidence 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."

1.9 I further confirm that none of this evidence has been produced with the use of AI technology.

1.10 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 Paper¹⁰.

1.11 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.12 As part of my evidence, I have sought data from the Council, upon which I rely, through a Freedom of Information ("FOI") request submitted to Three Rivers Council on 28 April 2026. A response was received on 6 May 2026. The 2024 FOI response provided by the Council that informed the production of the Tetlow King Planning Affordable Housing Statement (ref: M24/0511-01.RPT) produced in support of the application (ref:

¹⁰ Fixing Our Broken Housing Market (2017)

24/2073/OUT) has also been utilised in respect of local housing completions. All of the FOI correspondence is available to view at **Appendix JS1**.

- 1.13 A number of matters in respect of affordable housing have been agreed in paragraphs 6.38 to 6.49 of the signed Statement of Common Ground (dated 7 July 2026) (**CD8.1**), including that there is an acute, on-going and pressing need for more affordable housing in Three Rivers District.
- 1.14 This proof of evidence comprises the following nine sections:
- Section 2 establishes the importance of affordable housing as an important material consideration;
 - Section 3 considers the consequences of failing to meet affordable housing needs;
 - Section 4 analyses the development plan and related policy framework including corporate documents;
 - Section 5 sets out the identified affordable housing needs;
 - Section 6 examines past affordable housing delivery against identified needs;
 - Section 7 covers a range of affordability indicators;
 - Section 8 considers the future supply of affordable housing;
 - Section 9 reviews the Council's Assessment of the Application; and
 - Section 10 considers weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

- 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 PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF").

National Planning Policy Framework (12 December 2024)

- 2.2 The NPPF is a material planning consideration and identifies the role of affordable housing in the plan-making and decision-taking processes. I set out a summary of the key matters relating to affordable housing in **Appendix JS2**.

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.3 The Planning Practice Guidance ("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. **Appendix JS3** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Written Ministerial Statements

- 2.4 In 2024 and 2025, the government issued a number of Written Ministerial Statements (WMS) setting out their commitment to delivering more affordable housing in the context of a housing crisis. I set out a summary of each in **Appendix JS4**.

Summary and Conclusions

- 2.5 This section clearly demonstrates that, within national policy and guidance, providing affordable housing has long been established as, and remains, a key national priority of successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

- 3.1 The National Housing Strategy¹¹ sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 The consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:
- A lack of financial security and stability;
 - Harmful impacts on physical and mental health;
 - Decreased social mobility;
 - Negative impacts on children's education and development;
 - Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour, or those with substance abuse issues;
 - Being housed outside social support networks;
 - Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food; and
 - An increasing national housing benefit bill.
- 3.3 These harsh consequences on households, individuals and children unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

¹¹ Laying the Foundations: A Housing Strategy for England (November 2011)

- 3.4 I set out in **Appendix JS5** a series of reports, articles and debates that highlight the consequences of failing to delivery sufficient levels of affordable housing. I appreciate these relate to the national picture, but each authority where there has been under delivery of affordable housing, bears a responsibility for the national housing crisis.
- 3.5 I am strongly of the opinion that a step change in delivery of affordable housing locally and nationally is needed now.

Summary and Conclusions

- 3.6 The delivery of affordable housing both locally and nationally is urgently required. The level of affordable housing need in Three Rivers, coupled with worsening pressure on the affordability of housing, discussed in detail in the subsequent sections of my evidence, will continue to limit local households' ability to live stable, fulfilling lives. National policy recognises this challenge and calls for decisive action to increase housing supply, highlighting the significant social consequences of failure to meeting housing needs.

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 relevant Development Plan in respect of affordable housing for the application site currently comprises the Three Rivers Core Strategy 2011 – 2026 (2011). As the site is located in the Green Belt, the Three Rivers Development Management Policies Local Development Document (2013) is also of relevance.
- 4.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the PPG (March 2014, ongoing updates), the Draft Sarratt Neighbourhood Plan, the Affordable Housing Supplementary Planning Document (“SPD”) (2011) and a number of corporate documents which support the provision of affordable housing at the corporate level.

The Development Plan

Three Rivers Core Strategy (2011) – CD7.1

- 4.4 The Core Strategy sets out the Council strategy for delivering new homes, jobs and infrastructure over the 25-year plan period from 2001/02 to 2025/26. The Core Strategy is now time expired given that the end of the 2025/26 monitoring period has passed.
- 4.5 The Core Strategy was adopted before the introduction of the NPPF in 2012. Much of the content in the Core Strategy refers to the National policies of the PPS3 and RSS in force prior to the NPPF and is therefore substantially out of date.
- 4.6 Chapter 2 of the Core Strategy provides the ‘background and context’ to Three Rivers District. At paragraph 2.2, a number of issues are highlighted in Three Rivers that need to be addressed. This includes:

“House prices in Three Rivers are very high and affordability has been worsening¹². Alongside the need to provide more housing to meet forecast housing growth, there is therefore a particular need to achieve more affordable housing and to provide more family sized affordable housing” (emphasis added).

- 4.7 The Spatial Vision and Strategic Objectives of the Core Strategy are set out in Chapter 3. The Vision can be found at paragraph 3.2 and reads as follows:

“Looking forward to 2026 and beyond, the District will remain a prosperous, safe and healthy place where people want and are able to live and work.”

- 4.8 Nine priorities (a to i) are listed beneath the Spatial Vision on page eight, including priorities a) and c) which are of relevance to affordable housing:

“a) To provide growth required to support local communities and provide for their needs in the most sustainable way possible”

“c) To improve access to housing and affordable housing for communities across the whole District.”

- 4.9 Twelve Strategic Objectives (S1 to S12) are presented at paragraph 3.3. Strategic Objective S5 on page 10 concerns affordable housing:

“To increase levels of affordable housing in the District, prioritising the provision of social rented and larger family-sized homes

A step-change in the provision of affordable housing is needed in order to seek to meet the large, identified need for affordable housing in the District¹³. House prices are high relative to incomes in the District and a significant proportion of the population, particularly the young and those within the less affluent parts of the District, are unable to access housing in the general market. The lack of suitable and affordable housing within the District also has impacts on the ability of the District to attract and retain workers with impacts on key services and the local economy. There is a very high need for affordable housing within the District¹⁴, but viability considerations mean that it will not be possible to

¹² This problem remains prevalent. See Section 7 of this Proof of Evidence which illustrates that lower quartile house prices across the District and within the vicinity of the appeal site have continued to worsen.

¹³ Sadly, the shortfalls in affordable housing delivery against identified needs in Three Rivers demonstrated in Section 6 of my evidence and the scale of the Council's housing register (see section 7) show that the Core Strategy priority has not been addressed over the lifetime of the strategy.

¹⁴ Since the adoption of the Core Strategy in 2011, annual affordable housing needs have increased from 307 affordable homes per annum as demonstrated by the 2008 SHMA, to 527 affordable homes per annum as demonstrated by the 2024 LHNA. Affordable housing need remains substantially high.

meet all of this need within the period to 2026. The priority will therefore be social rented homes and larger family sized homes, as these are required to meet the most urgent housing needs within the District” (emphasis added).

- 4.10 Chapter 4 of the Core Strategy sets out the Council’s Place-Shaping Policies. This includes **PSP2 Development in the Key Centres (South Oxhey, Croxley Green, Abbots Langley, Chorleywood, Leavesden and Garston and Mill End)**, which states that development in these settlements will, among other points:

“Provide approximately 60% of the District’s housing requirements over the Plan period to include approximately 45% of affordable housing.”

- 4.11 Chapter 5 of the Core Strategy contains the Council’s Core Policies. Supporting text at paragraph 5.7 states that *“Providing sufficient housing to meet the needs of local communities in a sustainable way is one of the key challenges facing Three Rivers.”* Development in the District needs to provide a range of types and sizes of homes to meet needs and needs to address local affordability issues.
- 4.12 Table 1, located at paragraph 5.9 of the Core Strategy, sets out that housing supply and delivery is being monitored over the period 2001-2026. This aligns with the Council’s monitoring framework at Appendix 7 of the Core Strategy.
- 4.13 ‘Addressing Local Affordability’ is discussed from paragraph 5.25. Paragraph 5.25 echoes the comments made earlier at paragraph 2.2 that young people are having difficulty accessing housing on the open market and that house prices are very high in Three Rivers District.
- 4.14 Paragraph 5.38 recognises that *“It is clear from the evidence therefore that, in order to ensure affordability in the District in any meaningful way, a step-change in policy approach and affordable housing delivery is required.”* The Core Strategy expires at the end of the 2026 period. Unfortunately, there was no step-change as envisaged by the Core Strategy to improve affordability in the District. Section 6 of my Proof of Evidence demonstrates that over the Core Strategy period to date, the Council has achieved a woeful net delivery of just 33 affordable homes per annum.
- 4.15 **Policy CP4 Affordable Housing** is the main affordable housing policy for Three Rivers District, requiring 45% affordable housing provision on all new developments resulting in a net gain of one or more dwellings.

- 4.16 As a guide, Policy CP4 seeks 70% of the affordable housing provided to be social rented and 30% to be intermediate, however the Council will treat each case on its merits when assessing the amount, type and tenure mix.
- 4.17 Appendix 7 of the Core Strategy provides a Monitoring Framework for each of the Place-Shaping and Core Policies. Observing the Monitoring Framework for Core Policy CP4, despite calling for a step change in delivery, there is no target figure for the number of affordable homes to be delivered in Three Rivers District over the plan period.

Development Management Policies Local Development Document (2013) – CD7.2

- 4.18 Policy DM2 'Green Belt' sets out the exceptions to the construction of new buildings in the Green Belt, which include demonstrating very special circumstances (this pre-dates the most recent Green Belt policies contained in the NPPF and the PPG).

Other material considerations

Emerging Three Rivers Local Plan

- 4.19 Three Rivers District Council is preparing a new Local Plan that will set out a vision and policy framework for development in the District between 2014 and 2041.
- 4.20 Between July 2017 and August 2025, the Council undertook a series of Regulation 18 Consultations. Most recently, from 16 July to 31 August 2025, Three Rivers undertook a consultation on sites that were submitted to the council during a call for sites exercise earlier in 2025, as well as new and updated Local Plan policies. To date, the Council has not yet published a draft affordable housing policy for consultation.
- 4.21 On the 27 January 2026, the Local Plan was approved to proceed to Regulation 19 consultation by the Council's Extraordinary Full Council Committee. However, on 5 February 2026, Three Rivers was issued a holding direction by Matthew Pennycook MP, Minister of State for Housing and Planning, preventing the council from proceeding with the Regulation 19 consultation until the Minister reviewed its contents alongside the emerging Plan's evidence base.
- 4.22 Following his review, Matthew Pennycook set out in his Intervention Letter dated 18 March 2026 (**CD7.3**) that *"the available evidence demonstrates that the Council's Regulation 19 draft plan fails to propose allocating all appropriate housing sites available that could contribute towards meeting housing need. The Council are therefore proposing a plan which is highly likely to be found unsound at examination."*

- 4.23 The Minister of State for Planning and Housing issued a total of nine directions to the council, including to make modifications to lift the housing requirement to approximately 85% of need, and to review and update the draft plan and evidence base in readiness for Regulation 19 consultation and Submission.
- 4.24 Given the status and on-going intervention with the emerging plan, it should be afforded limited weight in the planning balance.

Sarratt Neighbourhood Plan (2025) – CD7.4

- 4.25 While the appeal site is geographically adjacent to the settlement of Croxley Green, it falls within the designated area for the Sarratt Neighbourhood Development Plan¹⁵ (“NDP”). The Sarratt NDP was Made in December 2025.
- 4.26 **Policy 5 ‘Affordable Housing’**, presented on page 35 of the Sarratt NDP sets out that development proposals of 1+ units or over are required to deliver at least 40% affordable housing on site at a tenure split of 75% social rent and 25% First Homes/affordable shared ownership products. The appeal proposals meet these requirements.
- 4.27 Page 35 refers to a 2018 Parish Plan survey where residents indicated *“housing stock was in short supply and too expensive for family members to be able to stay in Sarratt”*.
- 4.28 The NDP is also supported by the January 2020 Housing Needs Assessment undertaken by AECOM which identifies a need for 122 affordable rented homes and 48 affordable home ownership dwellings in the Sarratt neighbourhood plan area between 2020 and 2036.
- 4.29 The appeal scheme will be able to serve the affordable housing needs of the Sarratt neighbourhood Plan area as well as Croxley Green. The FOI correspondence at **Appendix JS1** shows that there has been no affordable housing delivery in Chorleywood North & Sarratt Ward in the last 24 years¹⁶, the proposed appeal scheme can provide very substantial benefits to local households in affordable housing need.

Affordable Housing Supplementary Planning Document (2011) – CD7.5

- 4.30 The Affordable Housing SPD was approved at Executive Committee in June 2011. It provides guidance on the application of Core Strategy Policy CP4 ‘Affordable Housing’.

¹⁵ The Designated NDP area aligns with the boundary for Sarratt Civil Parish (CP). For comparison purposes, please note that Chorleywood North & Sarratt Ward, referred to throughout this evidence, encompasses the whole of the Sarratt CP area as well as the land around Junction 18 of the M25 to the south of Sarratt.

¹⁶ See **Appendix JS1** and Figure 6.3 in Section 6 of this Proof of Evidence.

4.31 Chapters 1 and 2 of the SPD refer to the PPS3, RSS and previous evidence base documents. Much of this has since been superseded by the NPPF and later housing needs assessments. The SPD is therefore largely out of date.

4.32 This being said, while opening paragraph 1.1 of the SPD introduction is over 10 years old, it is still relevant in the context of today's housing market:

“Average house prices within Three Rivers are some of the highest in the country outside of London. House prices are high relative to incomes¹⁷ in the District resulting in a significant proportion of the population, particularly the young and those within the less affluent parts of the District, being unable to access housing in the general market. The lack of suitable and affordable housing within Three Rivers impacts on the ability of the District to attract and retain workers with impacts on key services and the local community.” (My emphasis)

4.33 Paragraph 1.2 recognises that *“A step-change in the provision of affordable housing is therefore required in order to seek to meet the large, identified need for affordable housing. To address these issues, the provision of affordable housing to meet the needs of the local people is one of the Council's top corporate priorities...”*

4.34 The definitions set out in paragraphs 3.1 to 3.3 of the Affordable Housing SPD are now largely out of date and are superseded by those in Annex 2 of the NPPF (2024).

4.35 In discussing the tenure mix to be secured on site, paragraph 3.11 states that *“The tenure mix of affordable housing units on-site should reflect the identified local and District wide housing need and contribute towards a balanced housing market and the creation of mixed, integrated and sustainable communities.”*

4.36 Paragraph 3.21 further explains that *“The overall balance of the type and size of affordable housing to be sought across the District will be informed by the Strategic Housing Market Assessment (SHMA) subject to local considerations on a site by site basis.”*

4.37 Paragraph 4.5 of the SPD requires that *“Affordable housing requirements will be secured by planning obligations under Section 106 of the Town and Country Planning Act 1990 or, where appropriate, by planning conditions.”*

¹⁷ See Figure 7.5 in Section 7 of this Proof which indicates that the ratio of lower quartile house price to incomes in Three Rivers in 2025 stood at 12.70, an 82% increase since the start of the Core Strategy period in 2001/02 when it stood at 6.98.

Corporate Documents

- 4.38 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority of Three Rivers District. These include the following documents:
- Three Rivers Corporate Framework 2026 – 2029 (**CD7.6**);
 - Three Rivers Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028 (**CD7.7**); and
 - Three Rivers Temporary Accommodation Placement Policy (December 2018, reviewed May 2024) (**CD7.8**).
- 4.39 A summary of the Council's Corporate Documents in the context of affordable housing is provided at **Appendix JS6**.

Summary and Conclusions

- 4.40 The relevant Development Plan in respect of affordable housing for Three Rivers District currently comprises the Three Rivers Core Strategy 2011 – 2026 (2011) and the Three Rivers Development Management Policies Document (2013).
- 4.41 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 Three Rivers District.
- 4.42 The application proposals provide an affordable housing contribution which exceeds requirements of Core Strategy Policy CP4.
- 4.43 The up to 300 affordable homes at the application site will make a very substantial contribution towards the annual affordable housing needs of the District, particularly when viewed in the context of the poor past rates of affordable housing delivery which is considered in detail in Section 6 of this Proof of Evidence.

Affordable Housing Needs

Section 5

Introduction

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

The Development Plan

- 5.2 The adopted Development Plan does not define a numerical target for the provision of affordable homes. Instead, the adopted Core Strategy (Policy CP4) seeks 45% affordable housing provision from qualifying developments.
- 5.3 In the absence of a defined affordable housing target figure in adopted and/or emerging policy, it is important to consider the objectively assessed need for affordable housing within the most up-to-date assessment of local housing need.

Housing Market Assessments

- 5.4 For the purposes of completeness, in addition to the two assessments set out below, I note that the Council also published SHMAs in 2016 and 2020 which assessed affordable housing need. These assessments both pre-date the 2018 update to the NPPF national definition of affordable housing and have since been superseded by the 2024 LHNA and so no longer provide the most robust or reliable assessment of affordable housing need in Three Rivers. I have therefore not considered them any further in my Proof of Evidence.

London Commuter Belt (West) Sub-Region Strategic Housing Market Assessment (2008) (published 2010) – CD7.9

- 5.5 The 2008 SHMA forms part of the housing evidence base for the adopted Three Rivers Core Strategy (2011). The 2008 SHMA provided an assessment of the housing (market and affordable) requirement for Three Rivers District between 2007/08 and 2020/21.

- 5.6 The 2008 SHMA pre-dates the NPPF and was informed by the now defunct Planning Policy Statement 3: Housing (“PPS3”) definitions and requirements, and the Regional Spatial Strategies (“RSS”). The PPS3 affordable housing definition has since been superseded by the NPPF (2024) Annex 2 definition for affordable housing which includes a wider variety on tenures to meet specific needs.
- 5.7 Figure 156 on page 166 of the 2008 SHMA identifies a net need for 1,200 affordable rented homes and an additional 3,100 intermediate affordable homes between 2007/08 and 2020/21 in Three Rivers District; a total of 4,300 net affordable homes. Aggregated on a per annum basis over the 14-year period, this gives a net affordable housing need figure of **307¹⁸ affordable homes per annum** in Three Rivers District between 2007/08 and 2020/21.
- 5.8 Given that the 2008 SHMA is now time expired it cannot be used for assessing current and on-going affordable housing need in Three Rivers. However, it is useful to understand the findings of the 2008 SHMA in the context of past affordable housing delivery in Three Rivers – see Figure 6.4 of this Proof of Evidence.

South West Herts Local Housing Needs Assessment Update (2024) – CD7.10

- 5.9 The 2024 South West Hertfordshire Local Housing Needs Assessment (“LHNA”) currently provides the most up to date assessment of affordable housing needs in Three Rivers District and was produced following the revisions to the NPPF definition of affordable housing.
- 5.10 The 2024 LHNA was commissioned to assess future development needs for housing across South West Hertfordshire over the 2021-2041 period to help inform strategic and local planning activities, including the production of the Three Rivers Emerging Local Plan.
- 5.11 The 2024 LHNA provides two separate assessments of affordable housing need; affordable/social rented housing need and affordable home ownership housing need.
- 5.12 Table 7.10 on page 100 of the 2024 LHNA identifies a net need for **364 affordable/social rented homes per annum** in Three Rivers District between 2021 and 2041, equivalent to 7,280¹⁹ net affordable/social rented dwellings over the 20-year period.

¹⁸ 4,300/14 = 307.14

¹⁹ 364*20 = 7,280

- 5.13 Table 7.42 on page 119 of the 2024 LHNA identifies a net need for **163 affordable home ownership homes per annum** in Three Rivers District between 2021 and 2041, equivalent to 3,260²⁰ net affordable/social rented dwellings over the 20-year period.
- 5.14 Combining the affordable/social rented need and the home ownership need figures, the 2024 LHNA identifies a net need for **527²¹ affordable homes per annum** over the 2021 to 2041 period, equivalent to a total of 10,540²² net affordable dwellings over the 20-year period. This is agreed between the Council and the Appellant at paragraph 6.46 of the signed Statement of Common Ground (dated 7 July 2026) (**CD8.1**).

Conclusions on Affordable Housing Needs

- 5.15 There is a clear and on-going pressing need for more affordable homes in Three Rivers District, with each successive needs assessment identifying a higher level of needs than its predecessor. The 2024 LHNA identifies a need for 527 affordable homes per annum over the 2021 to 2041 period.
- 5.16 In this context, the up to 300 affordable homes proposed (almost ten sites the net annual delivery from a single site) on the application site would make a meaningful and substantial contribution to meet the affordable housing needs of Three Rivers District, which the council accept is an acute and pressing need.

²⁰ 163*20 = 3,260

²¹ 364+163 = 527

²² 527*20 = 10,540

Affordable Housing Delivery

Section 6

Introduction

- 6.1 This section of the Statement analyses the delivery of affordable housing in Three Rivers District. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the District.
- 6.2 As part of my data collection in producing this evidence, the FOI request to TRDC at **Appendix JS1** asked for total and affordable completions figures for the authority broken down on a per annum basis for the period 2000/01 to 2025/26, if available. While the Council provided a response, I query the reliability of the response, noting that the total completions provided do not align with either the Council's Annual Monitoring Reports ("AMR") or MHCLG Live Table data, nor the 2024 FOI response (see **Appendix JS1**) provided by the Council to inform the production of the Tetlow King Planning Affordable Housing Statement (ref: M24/0511-01.RPT) produced in support of the application (ref: 24/2073/OUT). I note that the affordable housing completions provided do align with the Annual Monitoring Reports ("AMRs").
- 6.3 For the purposes of the following analysis, I have utilised the total and affordable housing completions figures reported by Three Rivers in their AMRs²³. As the AMR for 2024/25 is yet to be published, the 2024/25 overall and affordable housing completions figures in this Section of my proof are sourced from the accompanying FOI correspondence at **Appendix JS1**.

Past Affordable Housing Delivery

- 6.4 Figure 6.1 illustrates the delivery of affordable housing ("AH") in Three Rivers District since the start of the Core Strategy monitoring period in 2001/02.

²³ Use of the AMR completions data is consistent with the data utilised in Affordable Housing Statement that supported the application that was produced by Tetlow King Planning.

Figure 6.1: Gross Additions to Affordable Housing Stock, 2001/02 to 2024/25

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2001/02	381	71	19%
2002/03	255	91	36%
2003/04	186	42	23%
2004/05	94	18	19%
2005/06	229	57	25%
2006/07	369	123	33%
2007/08	286	13	5%
2008/09	351	83	24%
2009/10	48	0	0%
2010/11	107	25	23%
2011/12	185	55	30%
2012/13	176	39	22%
2013/14	142	48	34%
2014/15	285	93	33%
2015/16	215	85	40%
2016/17	144	0	0%
2017/18	264	90	34%
2018/19	149	22	15%
2019/20	406	82	20%
2020/21	99	91	92%
2021/22	154	34	22%
2022/23	204	61	30%
2023/24	260	3	1%
2024/25	376	42	11%
Total	5,365	1,268	24%
Avg. Pa.	224	53	

Source: TRDC Annual Monitoring Reports; FOI response (2024/25 only)

- 6.5 Between 2001/02 and 2024/25, a total of 5,365 dwellings were delivered in Three Rivers District, equivalent to 224 per annum. Of these, 1,268 dwellings were affordable tenures, equivalent to 53 per annum. This equates to 24% gross affordable housing delivery.
- 6.6 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor

through Right to Buy (“RtB”) sales from existing Council and Registered Provider (“RP”) affordable housing stock.

- 6.7 Figure 6.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy monitoring period in 2001/02, net of Right to Buy sales. A net loss of 485²⁴ affordable dwellings over this period equates to 38% of the gross affordable housing completions of 1,268 affordable dwellings over the 24-year period. This is a very concerning level of losses to affordable housing stock which the Council should be seeking to replace.

** continued overleaf **

²⁴ $(327 + 158) - 0 = 485$ dwellings

Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2001/02 to 2024/25

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	LPA Acquisitions	LPA RtB sales	RP RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	A	B	C	D	E	F (B + C) - (D + E)	G (F / A) X 100
2001/02	381	71		57		14	4%
2002/03	255	91		77		14	5%
2003/04	186	42		75		-33	-18%
2004/05	94	18		33		-15	-16%
2005/06	229	57		28		29	13%
2006/07	369	123		39		84	23%
2007/08	286	13		18		-5	-2%
2008/09	351	83		0		83	24%
2009/10	48	0		0		0	0%
2010/11	107	25		0		25	23%
2011/12	185	55		0	4	51	28%
2012/13	176	39		0	32	7	4%
2013/14	142	48		0	11	37	26%
2014/15	285	93		0	34	59	21%
2015/16	215	85		0	9	76	35%
2016/17	144	0		0	8	-8	-6%
2017/18	264	90	0	0	12	78	30%
2018/19	149	22	0	0	10	12	8%
2019/20	406	82	0	0	8	74	18%
2020/21	99	91	0	0	6	85	86%

2021/22	154	34	0	0	2	32	21%
2022/23	204	61	0	0	12	49	24%
2023/24	260	3	0	0	3	0	0%
2024/25	376	42	0	0	7	85	23%
Total	5,365	1,268	0	327	158	783	15%
Avg. Pa.	224	53	0	14	11	33	

Source: TRDC Annual Monitoring Reports; FOI response (2024/25 only); Registered Provider Statistical Data Returns

** continued overleaf **

6.8 Figure 6.2 demonstrates that on average between 2001/02 and 2024/25, the Council has added just 33 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 15% of the total average number of net housing completions.

6.9 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal²⁵ at Land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019. 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).

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

6.11 It is important that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account to reflect the actual level of affordable houses available, albeit there are no acquisitions recorded in Three Rivers. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery in Chorleywood North & Sarratt Ward

6.12 Figure 6.3 below illustrates the delivery of affordable housing in Chorleywood North & Sarratt Ward since the start of the Core Strategy monitoring period in 2001/02.

²⁵ APP/P4605/W/18/3192918

Figure 6.3: Gross Additions to Affordable Housing Stock in Chorleywood North & Sarratt Ward, 2001/02 to 2023/24

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2001/02	9	0	0%
2002/03	9	0	0%
2003/04	3	0	0%
2004/05	5	0	0%
2005/06	26	0	0%
2006/07	16	0	0%
2007/08	11	0	0%
2008/09	11	0	0%
2009/10	-2	0	0%
2010/11	19	0	0%
2011/12	5	0	0%
2012/13	13	0	0%
2013/14	13	0	0%
2014/15	0	0	0%
2015/16	18	0	0%
2016/17	5	0	0%
2017/18	6	0	0%
2018/19	4	0	0%
2019/20	11	0	0%
2020/21	9	0	0%
2021/22	40	0	0%
2022/23	4	0	0%
2023/24	13	0	0%
Totals	248	0	0%
Avg. Pa.	11	0	

Source: Freedom of Information response (13 June 2024)

- 6.13 Between 2001/02 and 2023/24 there have been a total of 248 net overall housing completions in Chorleywood North & Sarratt Ward. However, not single one of these dwellings over the 24-year period were delivered as affordable tenures. Losses existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.

- 6.14 I acknowledge that 83 new homes, including 44 affordable, are due to be delivered on Land rear of 17-49 Church Lane, Sarratt, given that I presented an affordable housing case at the appeal through which the scheme was approved. However, I am of the view that there remains a substantial unmet need for new affordable housing in the area, which justifies both the forthcoming development at 17-49 Church Lane and the appeal scheme at Croxley Green. This is clear when considering the Council's poor track record of affordable housing delivery against identified needs set out below.

Affordable Housing Delivery Compared to Affordable Housing Needs

- 6.15 Figure 6.4 illustrates net of Right to Buy affordable housing delivery compared to the assessment of affordable housing need provided by the 2008 SHMA of 307 net affordable dwellings per annum between 2007/08 and 2020/21.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2008 SHMA, 2007/08 to 2020/21

Monitoring Year	Additions to AH Stock (Net of RtB)	2008 SHMA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2007/08	-5	307	-312	-312	-2%
2008/09	83	307	-224	-536	27%
2009/10	0	307	-307	-843	0%
2010/11	25	307	-282	-1,125	8%
2011/12	51	307	-256	-1,381	17%
2012/13	7	307	-300	-1,681	2%
2013/14	37	307	-270	-1,951	12%
2014/15	59	307	-248	-2,199	19%
2015/16	76	307	-231	-2,430	25%
2016/17	-8	307	-315	-2,745	-3%
2017/18	78	307	-229	-2,974	25%
2018/19	12	307	-295	-3,269	4%
2019/20	74	307	-233	-3,502	24%
2020/21	85	307	-222	-3,724	28%
Total	574	4,298	-3,724		13%
Avg. Pa	41	331	-266		

Source: TRDC Annual Monitoring Reports; Registered Provider Statistical Data Returns; 2008 SHMA

- 6.16 Over the 2008 SHMA's full assessment period from 2007/08 to 2020/21, affordable housing additions (net of Right to Buy) averaged 41 net affordable dwellings per annum, against a need of 307 net affordable dwellings per annum. This equates to just

13% of identified needs. A shortfall of 3,724 affordable dwellings arose over the 14-year period, equivalent to an average annual shortfall of -266 affordable dwellings.

- 6.17 In reviewing Figure 6.4 above, it is quite clear that there is a substantial historic trend of failing to deliver sufficient affordable housing in Three Rivers District to meet identified needs. In three of the 14 monitoring years, net additions to affordable housing stock were so low that it totalled 0% or a negative figure.
- 6.18 Not once over the 14-year period was the 2008 SHMA need figure of 307 affordable homes met; the closest the Council came was in 2020/21 when it delivered 85 net affordable homes, equal to 28% of identified needs.
- 6.19 Figure 6.4 illustrates net of Right to Buy affordable housing delivery compared to the most recent assessment of affordable housing need provided by the 2024 LHNA of 527 net affordable dwellings per annum between 2021 and 2041.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2024 LHNA, 2021/22 to 2024/25

Monitoring Year	Additions to AH Stock (Net of RtB)	2024 LHNA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	32	527	-495	-495	6%
2022/23	49	527	-478	-973	9%
2023/24	0	527	-527	-1,500	0%
2024/25	35	527	-492	-1,992	7%
Total	116	2,108	-1,992		6%
Avg. Pa	29	527	-498		

Source: TRDC Annual Monitoring Reports; FOI response (2024/25 only); Registered Provider Statistical Data Returns; 2024 LHNA

- 6.20 As can be seen, since the start of the 2024 LHNA period in 2021/22, affordable housing additions (net of Right to Buy) have averaged just 29 net affordable dwellings per annum, against a need of 527 net affordable dwellings per annum. A shortfall of 1,992 affordable dwellings has arisen over the four-year period, equivalent to an average annual shortfall of -498 affordable dwellings.
- 6.21 To date, affordable housing delivery in Three Rivers continues to be severely lacking in the context of identified needs. Between 2021/22 and 2024/25, only 6% of the affordable housing need identified by the 2024 LHNA was met. This means that 94% of households in affordable housing need had their needs go unmet. This is a very bleak situation for these households in need and has necessitated the governments

intervention in the emerging plan to increase the prospects of higher delivery of housing including affordable housing.

- 6.22 This Council and the Appellant agree at paragraph 6.46 of the signed Statement of Common Ground (dated 7 July 2026) (**CD8.1**) that there has not been enough affordable homes built per year and there isn't sufficient affordable housing stock in Three Rivers District.

Summary and Conclusions

- 6.23 The above evidence demonstrates that across Three Rivers District the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 6.24 In the 24-year period since the start of the Core Strategy monitoring period in 2001/02, net of Right to Buy affordable housing delivery represented just 15% of overall housing delivery, equating to just 33 affordable dwellings per annum.
- 6.25 The Council has a historic and persistent trend in failing to deliver sufficient affordable housing to meet identified needs in the context of the -3,724 shortfall in affordable housing delivery against the 2008 SHMA between 2007/08 and 2020/21. Only 13% of identified needs were met.
- 6.26 Against the most recent assessment of affordable housing need identified in the 2024 LHNA, there has been a shortfall in delivery of -1,992 affordable dwellings over the four-year period between 2021/22 and 2024/25, equivalent to an average annual shortfall of -498 affordable dwellings. Only 6% of identified needs have been met to date.
- 6.27 Delivery on a local level is poorer still as the Council has set out in its FOI response (see **Appendix JS1**) that there have been no affordable homes delivered in Chorleywood North & Sarratt Ward since the start of the Core Strategy monitoring period in 2001/02. This should be viewed in the context of the adopted Sarratt Neighbourhood Plan and its evidence base which identified a need for 122 affordable rented homes and 48 affordable home ownership dwellings in the Sarratt neighbourhood plan area between 2020 and 2036. In reviewing the future pipeline of housing delivery sites in Sarratt in the TRDC April 2026 Housing Land Supply Update (**CD7.11**) for the 2025/26 to 2029/30 period, it does not appear that there are sufficient sites delivering affordable housing in the area over the next five years to work toward meeting this identified need.

- 6.28 It is clear that a 'step change' in affordable housing delivery, as called for on the adopted Core Strategy²⁶, is very much still needed now in Three Rivers District to address these severe shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.29 In light of the identified level of need there can be no doubt that the delivery of up to 300 affordable dwellings on the proposed site will make a very important and substantial contribution to the acute and pressing affordable housing needs of Three Rivers District.

²⁶ See paragraph 5.38 of the adopted Core Strategy (2011).

Affordability Indicators

Section 7

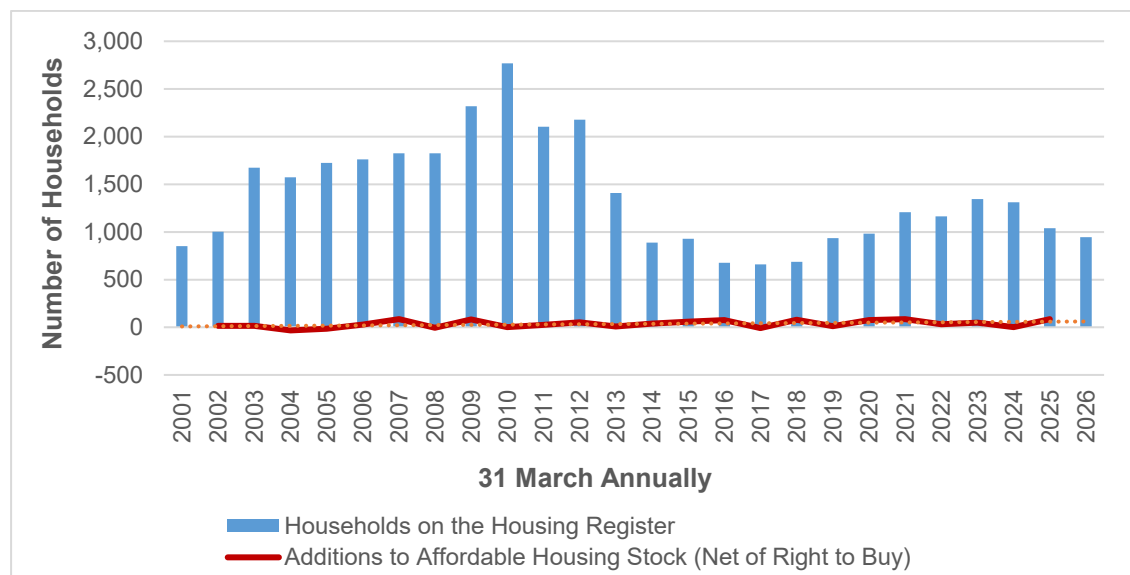
Introduction

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

Housing Register

- 7.2 The Council's Freedom of Information response (**Appendix JS1**) confirms that on 31 March 2026 there were 946 households on the Housing Register.
- 7.3 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Three Rivers District since the start of the Core Strategy monitoring period in 2001.

Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2001/02 to 2025/26



Source: MHCLG Open Data; TRDC Annual Monitoring Reports; Registered Provider Statistical Data Returns

- 7.4 As Figure 7.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Three Rivers District since 2001/02.

- 7.5 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF Annex 2 definitions, i.e. social rented, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.
- 7.6 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the NPPF. This includes routes to affordable home ownership.
- 7.7 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.

Housing Register Bids and Lettings

- 7.8 Figure 7.2 below demonstrates average number of bids per property in Chorleywood North & Sarratt Ward over the 2025/26 monitoring period for a range of types of affordable property.

Figure 7.2: Bids Per Property in Chorleywood North & Sarratt Ward, April 2025 to March 2026

Type of Affordable Property	No. Properties Advertised	Average Bids Per Property
1-bed affordable dwelling	1	25
2-bed affordable dwelling	0	n/a
3-bed affordable dwelling	0	n/a
4+ bed affordable dwelling	0	n/a

Source: Freedom of Information Response (6 May 2026)

- 7.9 Figure 7.2 demonstrates that that there was just one affordable dwelling advertised for let in Chorleywood North & Sarratt Ward in the 2025/26 monitoring period. This was a 1-bed affordable dwelling that received 25 bids from households in affordable housing need. No 2-bed, 3-bed or 4+bed affordable homes were advertised for let in the ward in the 2025/26 monitoring period.

- 7.10 Appendix JS1 confirms that over the 2025/26 monitoring period there was **just one social housing letting in Chorleywood North & Sarratt Ward**.
- 7.11 For every successful letting, there are clearly many households who have missed out and are left waiting for an affordable home. Evidently, there is a clear and pressing need for affordable homes locally within the Chorleywood North & Sarratt Ward this is not being met.

Temporary Accommodation

- 7.12 Figure 7.3 below shows that on 31 March 2026, there were 44 households housed in temporary accommodation within the Three Rivers District region. Three Rivers District Council has a responsibility to house these households.
- 7.13 Furthermore, an additional two households were housed in temporary accommodation outside the Three Rivers District region on 31 March 2026. Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network.

Figure 7.3: Temporary Accommodation, 2025 and 2026

Households in Temporary Accommodation	31 March 2026
Households Housed within Three Rivers District Council	44
Households Housed outside Three Rivers District Council	2
Total Households	46

Source: Freedom of Information (6 May 2026)

- 7.14 MHCLG data indicates that Three Rivers spent £332,000 on temporary accommodation spends in 2025.

Homelessness

- 7.15 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2025 and 31 March 2026, the Council accepted 229 households in need of homelessness prevention duty²⁷, and a further 66 households in need of relief duty²⁸ from the Council.

²⁷ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

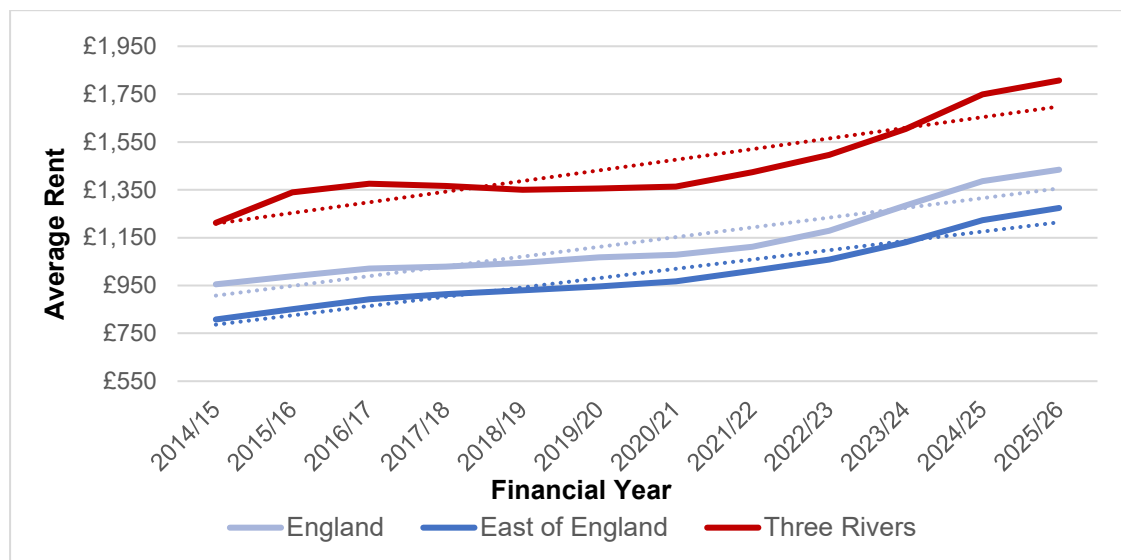
²⁸ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

- 7.16 The Council's Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028 confirms on pages 9-11 that “*overall demand on the Housing Service has increased by 50% since 2017*”, and that following the Covid-19 pandemic “*a significant increase in enquiries can be seen post 2019/20.*”
- 7.17 The Strategy also clarifies that “*Data indicates that the primary reason for the council to accept the homelessness duty towards a household is due to an eviction by a family member (parents/extended family) or friend. This is followed closely by the eviction of a household from a property in the private rented sector.*”
- 7.18 The Private Rented Sector (“PRS”) is not a suitable substitute for affordable housing and does not have an equivalent role in meeting the housing needs of low-income families. It is highly pertinent that in the NPPF, PRS housing is not included within the Annex 2 definition of affordable housing.

Private Rental Market

- 7.19 Office for National Statistics (“ONS”) data (first produced in 2014/15) shows that average (mean) private rents in Three Rivers stood at £1,807 per calendar month (“pcm”) in 2025/26. This represents a 49% increase from 2014/15 where average private rents stood at £1,212 pcm.

Figure 7.4: Average (Mean) Private Sector Rents, 2014/15 to 2025/26



Source: VOA and ONS.

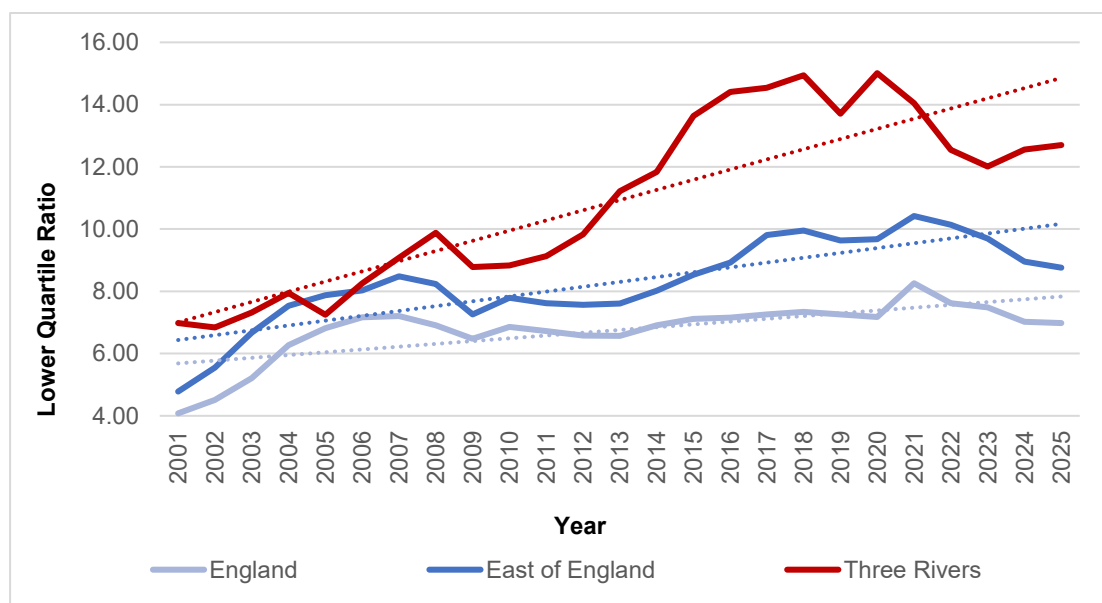
- 7.20 An average rent of £1,807 pcm in 2025/26 is 42% higher than the East of England figure of £1,274 pcm and 26% higher than the national figure of £1,434 pcm. It should also be noted that since the start of the 2024 LHNA period in 2021/22, average rents in Three Rivers have increased by 27%.

- 7.21 It is important to note that ONS rental data is calculated using all transaction data, i.e., existing lets as well as new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Three Rivers.

Lower Quartile House Prices

- 7.22 For those seeking a lower quartile (“LQ”) priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of LQ house price to incomes in Three Rivers in 2025 stood at **12.70**, an 82% increase since the start of the Core Strategy period in 2001/02 when it stood at 6.98.
- 7.23 This means that those on LQ incomes in Three Rivers, seeking to purchase a LQ priced property, now need to find almost 13 times their annual income to do so.
- 7.24 The LQ ratio in Three Rivers stands substantially above the national average of 6.98 (+82%) and significantly above the Region average of 8.76 (+45%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.
- 7.25 As clearly seen in Figure 7.5 below, the LQ ratio in Three Rivers has worsened considerably since 2023, climbing from 12.01 to 12.70 in 2025 (+6%). Compare this to the East of England (-10%) and to England (-7%) which have both seen improvements in LQ affordability over the same period. It is apparent that Three Rivers is currently bucking the trend seen on a national and regional basis in the context of affordability.

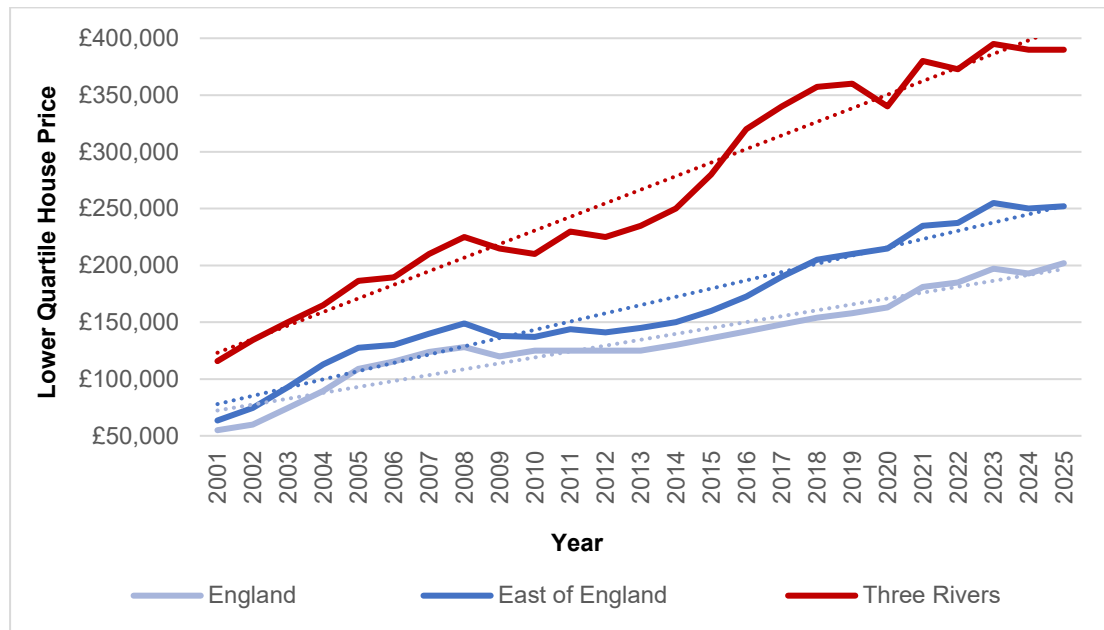
Figure 7.5: Lower Quartile Workplace-Based Affordability Ratio comparison, 2001 to 2025



Source: ONS.

- 7.26 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 182% higher than that.
- 7.27 Figure 7.6 illustrates the LQ house sale prices for England, the East of England, and Three Rivers District. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2001 and 2025.

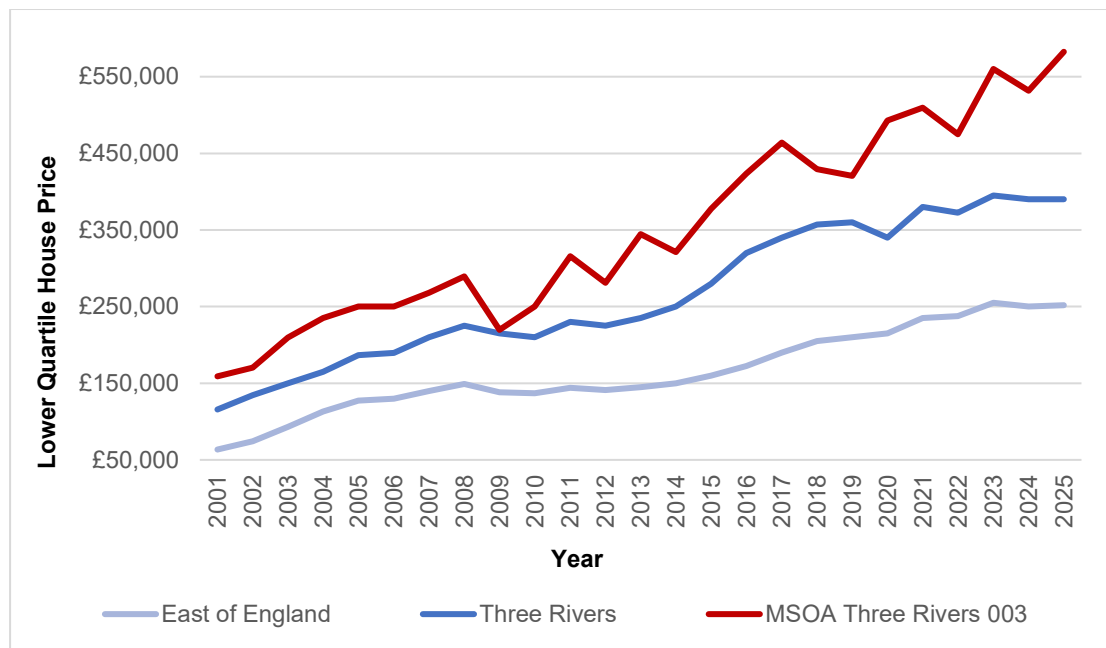
Figure 7.6: Lower Quartile House Prices, 2001 to 2025



Source: ONS.

- 7.28 The LQ house price across Three Rivers has risen by 237% from £115,750 in 2001 to £390,000 in 2025. This compares to a 297% increase across the East of England and a national increase of 268% over the same period.
- 7.29 In 2025 LQ house prices in Three Rivers (£390,000) were 55% higher than across the East of England (£252,000) and 93% higher than the national figure (£202,000). It should also be noted that since the start of the 2024 LHNA period in 2021/22 LQ house prices in Three Rivers have increased by 9%.
- 7.30 Figure 7.7 below compares the lower quartile house sale prices in MSOA 'Three Rivers 003' with Three Rivers District and the East of England. Once again, it demonstrates that they have increased dramatically between the start of the Core Strategy period in 2001 and 2026.

Figure 7.7: Lower Quartile House Price Comparison, 2001 to 2025



Source: ONS.

- 7.31 The LQ house price across MSOA 'Three Rivers 003' has risen by 266% from £159,000 in 2001 to £582,500 in 2025. This figure is 49% higher than the Three Rivers figure of £390,000, (which has seen an increase of 237% over the period) and 131% higher than the East of England figure of £252,000 (which has seen an increase of 297% over the period).
- 7.32 Figure 7.7 vividly illustrates that local LQ house prices in MSOA 'Three Rivers 003' have risen steeply in the past 12 months from £531,625 in 2024 to £582,500 in 2025. This is important in that the same pattern has not been observed across Three Rivers or across the East of England where LQ house prices have both remained broadly consistent. Not only is the local area unaffordable for a significant part of the local population, but it is also becoming increasingly more unaffordable for a larger proportion of the local population, which will result in many households being pushed out of the area. It is imperative that Three Rivers delivers new affordable housing in the area to counteract rising house prices and to house those in need.
- 7.33 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire²⁹ in January 2022. In considering the

²⁹ APP/Y3940/W/21/3278256

provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

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

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

Summary and Conclusions

- 7.34 As demonstrated through the analysis in this section, affordability across Three Rivers has been, and continues to be, in crisis.
- 7.35 House prices and rent levels in are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Three Rivers out of the reach of more and more people.
- 7.36 Analysis of market signals is critical in understanding the affordability of housing. It is TKP’s opinion that there is an acute housing crisis in Three Rivers, with a lower quartile house price to average income ratio of **12.70**.
- 7.37 Market signals indicate a worsening trend in affordability in Three Rivers and within the local area of the appeal site. By any measure of affordability, this is an authority in the midst of an acute affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Future Supply of Affordable Housing

Section 8

Introduction

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

Addressing the Shortfall in Affordable Housing Delivery

- 8.2 The 2024 LHNA identifies an objectively assessed need for 527 net affordable homes per annum between 2021/22 and 2040/41. Over the 20-year period this equates to a total need for 10,540 net affordable homes.
- 8.3 In the first four years of the 2024 LHNA period, the Council have overseen the delivery of 116 affordable homes (net of Right to Buy) against a need of 2,108 net new affordable homes, which has resulted in a shortfall of -1,992 affordable homes.
- 8.4 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 PPG³⁰ and endorsed at appeal.
- 8.5 The critical importance of understanding the ability of the Council to meet future need was considered in a recent appeal at Sondes Place Farm, Dorking where I provided affordable housing evidence.
- 8.6 The Inspector accepted the findings of the ‘future supply of affordable housing’ evidence and endorsed the use of the Sedgefield approach to clear a previous backlog of affordable housing delivery (**CD5.2, p.16 [85-86]**):

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

To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to

³⁰ Paragraph: 022 Reference ID: 68-031-20190722

be substantially below that level of delivery. This will mean the existing shortfall will only become worse.” (my emphasis).

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

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

- 8.8 It is therefore imperative that the -1,992 dwelling affordable housing shortfall accumulated since 2021/22 is addressed as soon as possible and in any event within the next five years.
- 8.9 When the shortfall is factored into the 2024 LHNA identified need of 527 affordable homes per annum for the period 2021/22 and 2040/41, the number of affordable homes the Council will need to complete increases by 76% to 925 net affordable homes per annum over the period.
- 8.10 This would ensure that for the remainder of the 2024 LHNA period up to 2040/41 the annual affordable housing need reduces back down to 527 per annum to deal solely with newly arising needs. This is illustrated in Figures 8.1 and 8.2.

Figure 8.1: Annual Affordable Housing Need incorporating Backlog Needs since the 2021/22 base date of the 2024 LHNA

A	Affordable housing need per annum for the period 2021/22 to 2040/41 identified in the 2024 LHNA	527
B	Net Affordable housing need for the period 2021/22 to 2024/25 (A x 4)	2,108
C	Net of Right to Buy sales Affordable housing completions for the period 2021/22 to 2024/25	116
D	Shortfall/backlog of affordable housing need for the period 2021/22 to 2024/25 (B – C)	1,992
E	Backlog affordable housing need per annum required over the period 2025/26 to 2029/30 (D/5)	*398
F	Full affordable housing need per annum for the period 2025/26 to 2029/30 (A + E)	925
G	Full affordable housing need for the period 2025/26 to 2029/30 (F x 5)	4,625

** Please note that figures account for rounding*

- 8.11 Further indication of the severity of the situation can be seen in Figure 8.2 below which illustrates that the Council would need to deliver 4,625 net affordable homes over the next five years to address backlog needs in line with the Sedgefield approach (which seeks to address accumulated needs within 5 years along with ongoing need).

Figure 8.2: Annual Affordable Housing Need 2025/26 to 2029/30 incorporating Backlog Needs Accrued in 2021/22 to 2024/25 when applying the Sedgefield Approach

Monitoring Period	2024 LHNA Net Affordable Housing Need per annum	Net Affordable Housing Need per annum When Addressing Backlog Within Next Five Years
2025/26	527	925
2026/27	527	925
2027/28	527	925
2028/29	527	925
2029/30	527	925
Total	2,635	4,625

- 8.12 It is clear that the backlog of affordable housing needs within Three Rivers will continue to grow unless the Council takes urgent and drastic action to address needs and deliver more affordable homes.

The Future Supply of Affordable Housing

- 8.13 The Council has published its latest Five-Year Housing Land Supply (“5YHLS”) Update in April 2026 (**CD7.11**), covering the period 1 April 2025 to 31 March 2030.
- 8.14 If we were to generously to assume that all 1,184 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. 45%³¹) as a proportion of overall housing completions, this is likely to deliver only 533 affordable dwellings over the period, equating to just 107 new affordable dwellings per annum.
- 8.15 If one were to assume that the past gross affordable housing provision of 24% is to be continued over the next five years, this is likely to deliver only 284 affordable dwellings over the period, equating to just 57 new affordable dwellings per annum.
- 8.16 Both figures fall very substantially short of the 925 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach

³¹ I accept that some sites, such as the appeal site, may deliver as much as 50% affordable housing in the context of the NPPF Golden Rules. However, some sites included in my assumption will deliver 0% affordable housing due to factors such as the relevant size thresholds or viability constraints.

as well as the 527 net affordable housing needs per annum identified in the 2024 LHNA.

- 8.17 As Figure 6.2 of this evidence highlights, affordable housing provision has slipped far below the policy compliant 45% since the start of the plan period in 2001/02 up to 2024/25. Average delivery on a per annum basis over the same period has been just 33 affordable homes net of Right to Buy.
- 8.18 Consequently, I have no confidence that the Council can see a sufficient step change in the delivery of affordable housing to meet annual needs. This makes it even more important that suitable sites, such as the appeal site, are granted planning permission now in order to boost the supply of affordable housing.

Summary and Conclusions

- 8.19 It is imperative that the -1,992 dwelling affordable housing shortfall accumulated since 2021/22 is addressed as soon as possible and in any event within the next five years.
- 8.20 When the shortfall is factored into the 2024 LHNA identified need of 527 affordable homes per annum for the period 2021/22 and 2040/41, the number of affordable homes the Council will need to complete increases by 76% to 925 net affordable homes per annum over the period.
- 8.21 The above evidence demonstrates that Council is unlikely to be able to meet its affordable housing needs over the next five years. Generously assuming all sites in the in the 5YHLS would provide policy compliant levels of affordable housing (45%) there is a possible supply of just 107 new affordable dwellings per annum. If we were to assume that the past gross affordable housing provision of 24% is to be continued over the next five years, this is likely to deliver a much lower affordable housing future supply of just 57 new affordable dwellings per annum.
- 8.22 Consequently, there is a substantial need for more affordable housing now. In light of the Council's poor record of affordable housing delivery and the volatility of future affordable housing delivery there can be no doubt that the provision of up to 300 affordable dwellings on this site to address the district-wide needs of Three Rivers should be afforded **very substantial weight** in the determination of this appeal.

Council's Assessment of the Application

Section 9

Introduction

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

Committee Report

- 9.2 The application was refused on 30 January 2026 (see decision notice **CD4.2**) by delegated powers. The Committee Report (dated 22 January 2026) can be seen under **CD4.4** which recommended the application for approval subject to the completion of a S106 Agreement.
- 9.3 At paragraph 7.22.14 the Committee acknowledge the pressing need for affordable housing within the District.
- 9.4 In undertaking the planning balance, paragraph 7.22.15 confirms the following in respect of affordable housing:

"The proposed development would exceed the requirements of Policy CP4 of the Core Strategy (adopted October 2011) and Policy 5.1 of the Sarratt Neighbourhood Plan (adopted 2025) in terms of the overall percentage of affordable housing provided, providing an additional 30 affordable units over that required by Policy CP4. The affordable housing would all be provided on site and would be tenure blind. The tenure mix would not strictly accord with these policies, with the inclusion of an element of Affordable Rent. However, overall, 70% (210 units) would be provided as a Rented product with an additional 30% (63 units) as Affordable Home Ownership (e.g. Shared Ownership) in accordance with the Emerging Local Plan and the tenure mix is supported by TRDC Housing Services."

- 9.5 The Committee recommends at paragraph 7.22.16 that significant weight should be afforded to the need for affordable housing in the decision-making process.

- 9.6 Paragraphs 7.22.17 and 7.22.18 confirm that the application complies with the NPPF Golden Rules and should be afforded significant weight in the decision-making process.
- 9.7 Both of these weightings are confirmed again in the table at paragraph 7.22.38.
- 9.8 The comments from the TRDC Housing Officer are provided at paragraph 9.30.1 and 9.30.2 which state that the Housing Services generally support this application in principle.
- 9.9 Comments from the TRDC Planning Policy Team are provided at paragraph 9.33.1, including: “...*there has been an undersupply of affordable housing within the District throughout the plan period and as such there is a pressing need for the delivery of affordable housing. The submitted planning statement sets out that up to 50% of the dwellings would be affordable housing, which would make a significant and positive contribution to the affordable housing need within the District.*” (my emphasis).

Three Rivers Statement of Case – CD8.4

- 9.10 There is no consideration of the affordable housing benefits of the appeal scheme in the Council’s Statement of Case.

Croxley Green Parish Council Statement of Case – CD8.5

- 9.11 There was no consideration of the affordable housing benefits of the appeal scheme in Croxley Parish Council’s Statement of Case. I note that they have since withdrawn their Rule 6 status.

Summary and Conclusions

- 9.12 I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.
- 9.13 The acute level of affordable housing need in Three Rivers, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. Whilst I do not challenge the right of objectors to oppose unwelcome development, it is a stark aspect of my experience of almost all of the inquiries in which I have given evidence, that those in housing need never attend to explain exactly why they need additional housing and the consequences of not providing it.
- 9.14 In my opinion, the Council has thus far sought to downplay the provision of up to 300 affordable homes at the appeal site in its Statement of Case. It is my view that

affordable housing is an individual benefit of the appeal proposals which should be afforded **very substantial weight** in the determination of this appeal.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 10

Introduction

- 10.1 The NPPF is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 10.2 Paragraph 61 of the NPPF sets out the Government's clear objective of *"significantly boosting the supply of homes"* before explaining that *"The overall aim should be to meet an area's identified housing need"*.
- 10.3 Furthermore, paragraph 62 requires that *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."* (My emphasis).
- 10.4 The NPPF requires local authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, *"including those who require affordable housing"*.
- 10.5 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.

Benefits of the proposed Affordable Housing at the appeal site

- 10.6 The offer exceeds the requirements of adopted Policy CP4 (45%) of the Local Plan (2011). It should be noted that this policy was drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 10.7 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton³² in September 2018 who was clear at paragraph 72 of their decision that:

³² APP/Y2736/W/15/3136237

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

10.8 Similarly, as recognised in a recent appeal decision in at Coombebury Cottage, Dunsfold³³ *“the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs.”* The benefits of the proposed affordable homes at the appeal site should therefore be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.

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

- Policy compliant offer of 50% (up to 300 dwellings) of the scheme provided as affordable housing;
- An addition of up to 147 social rent homes;
- An addition of up to 63 affordable rent homes;
- An addition of up to 90 affordable home ownership homes;
- A deliverable scheme which provides much needed affordable homes;
- In a sustainable location;
- With the affordable homes managed by a Registered Provider;
- Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation; and
- Greater security of tenure than the private rented sector.

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

10.11 An appeal that considers the issue of benefits is the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at

³³ APP/R3650/W/23/3332590

Hawkhurst in Kent (**CD5.3**). In critiquing the Council's views regarding the affordable housing benefits of the scheme, the Inspector made the following comments:

“The Council are of the view that the housing benefits of the scheme are ‘generic’ and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council’s acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts on the most vulnerable people in the borough, who are unlikely to describe their needs as generic.” (Paragraph 118)

10.12 I agree, the recipients of 300 homes here will not describe their needs as generic.

10.13 Considering the high and rising numbers of households on the housing register and worsening affordability indicators in Three Rivers, there can be no doubt in my mind that the provision of up to 300 affordable dwellings on this site should be afforded **very substantial weight** in the determination of this appeal.

Relevant Secretary of State and Appeal Decisions

10.14 The importance of affordable housing as a material consideration has been reflected in several Secretary of State (“SoS”) and appeal decisions.

10.15 Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance. A collection of such SoS decisions can be viewed at **Appendix JS7**.

Appeal decision: Land rear of 17-49 Church Lane, Sarratt (3 May 2024) (ref: 3311477) – CD5.4

10.16 This appeal concerned 83 new dwellings, including 44 affordable homes³⁴, and a new doctors’ surgery in the Green Belt in Three Rivers where I presented affordable housing evidence for the appellant.

10.17 The Inspector set out in paragraph 79 of their decision letter that *“The Council does not dispute that there is a significant and pressing need for affordable housing, nor does it question the Appellant’s evidence on this matter”* (my emphasis).

³⁴ I acknowledge that this scheme will deliver new affordable homes in the Sarratt area at paragraph 6.14 of this Proof of Evidence. I remain of the opinion that the scale of unmet affordable housing need in Three Rivers District justifies both schemes at Church Lane and Croxley Green in respect of affordable housing.

- 10.18 Similar to the appeal proposals at Croxley Green, the Inspector noted that the appeal proposal comprised a mix of social rent/affordable rent and affordable home ownership tenures, concluding at paragraph 81 that *“The proposal would make a very positive contribution to all these types of much needed housing within the district.”*
- 10.19 In considering the weight to affordable housing in their decision, the Inspector specified at paragraph 81, *“I consider the benefits of market and affordable housing each attract **very substantial weight**”* (my emphasis).
- 10.20 Furthermore, in discussing the planning balance at paragraph 95: *“...the substantial benefits of the scheme, comprising the provision of market and affordable housing, first homes, and custom and self-build housing, the provision of a doctors’ surgery, as well as the various other benefits, including design quality, open space provision and economic benefits, clearly outweigh the harms that would be caused”* (my emphasis).
- 10.21 In understanding the content of this Proof of Evidence, I am of the view that the circumstances in Three Rivers in the context of affordable housing delivery remain unchanged in that the Council has continued to severely underperform against its identified needs and affordability continues to be in crisis.
- 10.22 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 have attached substantial weight and very 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.

Summary and Conclusion

- 10.23 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.
- 10.24 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.

- 10.25 The Three Rivers Core Strategy plan period expires at the end of the 2026 and it is clear that the affordable housing priorities and concerns of the adopted Core Strategy have not been addressed. There has been no step-change as envisaged by the Core Strategy to improve affordability in the District, and net delivery to date over the plan period has been very poor at just 33 affordable homes per annum.
- 10.26 Market signals indicate a worsening trend in affordability across Three Rivers and, by any measure of affordability, this is an authority amid an affordable housing emergency, and one through which urgent action must be taken to deliver more affordable homes.
- 10.27 Against the scale of unmet need and worsening affordability indicators across Three Rivers, there is no doubt in my mind that the provision of up to 300 affordable homes will make a very substantial contribution. Considering all the evidence I consider that this contribution should be afforded **very substantial weight** in the determination of this appeal.

Appendix JS1

FOI Correspondence (28 April, 6 May, 12 and 23 June 2026,
29 May, 13 June 2024)

Leonie Stoate

From: FOI (Three Rivers) <foi@ThreeRivers.gov.uk>
Sent: 23 June 2026 15:13
To: Leonie Stoate
Subject: RE: Housing Data

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Leonie

The Planning Policy department has provided the information in the table below and we apologise for not including this in our original response to you.

Regards

Phil King
Freedom of Information Team
Ref: 1127-0526

Three Rivers District Council
www.threerivers.gov.uk

Number of net affordable housing completions in the Three Rivers District Council area from 2000/01 to 2025/26	
Year	Number of units
2000/2001	0
2001/2002	71
2002/2003	91
2003/2004	42
2004/2005	18
2005/2006	57
2006/2007	123
2007/2008	13
2008/2009	83
2009/2010	0
2010/2011	25
2011/2012	55
2012/2013	39
2013/2014	48
2014/2015	93
2015/2016	85
2016/2017	0
2017/2018	90
2018/2019	22
2019/2020	82
2020/2021	91
2021/2022	34
2022/2023	61
2023/2024	3
2024/2025	42
2025/2026	0

From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Sent: 12 June 2026 18:20
To: FOI (Three Rivers) <foi@ThreeRivers.gov.uk>
Subject: RE: Housing Data

Good afternoon,

Many thanks for the swift response.

I note that the Council has not provided the affordable completions for the district on a per annum basis in response to Q13. Can this please be corrected? Alternatively, if the Council could provide the figure for net affordable housing completions in 2024/25 across Three Rivers district that would be useful.

Kind regards,

Leonie Stoate BSc (Hons) MSc MRTPI
Principal Planner
Tetlow King Planning



Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol,
BS165EL

E: leonie.stoate@tetlow-king.co.uk

T: 0117 9561916

M: 07517 106104

W: tetlow-king.co.uk



From: FOI (Three Rivers) <foi@ThreeRivers.gov.uk>
Sent: 06 May 2026 15:11
To: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Subject: RE: Housing Data

Thank you for your Freedom of Information request.

Colleagues from the Housing department and Planning Policy department have provided the information which has been added to your e-mail below.

Regards

Phil King
Freedom of Information Team
Ref: 1127-0526

Three Rivers District Council
www.threerivers.gov.uk

From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Sent: 28 April 2026 10:22
To: FOI (Three Rivers) <foi@ThreeRivers.gov.uk>
Subject: Housing Data

Dear Sir / Madam,

I hope this email finds you well. I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in Chorleywood North & Sarratt Ward, as well as the Three Rivers District Council area.

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

Confirmation of receipt would be greatly appreciated.

Freedom of Information Request

Questions 1 to 11 of this request relate to data held by the Housing Department.
Questions 12 to 15 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register on 31 March 2026.

We are unable to provide retrospective numbers but as of today we have 946 households on the register.

2. The average waiting times on 31 March 2026 for the following types of affordable property across the Authority:
- 1-bed affordable dwelling;
 - 2-bed affordable dwelling;
 - 3-bed affordable dwelling; and
 - A 4+ bed affordable dwelling.

We operate a choice based lettings system rather than a waiting list. Applicants choose which types of properties they wish to bid on and in which geographical locations. Therefore, we cannot give an accurate answer to your question as an applicant who bids on all suitable properties would be housed much quicker than an applicant who only bids on a particular property type in an area of choice.

3. The average waiting times on 31 March 2025 for the following types of affordable property across the Authority:
- 1-bed affordable dwelling;
 - 2-bed affordable dwelling;
 - 3-bed affordable dwelling; and
 - A 4+ bed affordable dwelling.

See response to Q2 above..

4. The total number of households on the Council's Housing Register on 31 March 2026 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2026)
Chorleywood North & Sarratt Ward	

Households do not specify preferred choice of location, they choose which properties they wish to bid on.

5. The number of properties advertised, and the average number of bids per property over the 2025/26 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Chorleywood North & Sarratt Ward	
	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling	1	25
2-bed affordable dwelling	0	N/A
3-bed affordable dwelling	0	N/A
4+ bed affordable dwelling	0	N/A

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

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

Please see attached. Link to our current allocations policy is here:

<https://www.threerivers.gov.uk/services/housing/strategies-and-policies>

Social Housing Stock

7. The total number of social housing dwelling stock on 31 March 2026 in the following locations:

Location	Total Social Housing Stock (31 March 2026)
Chorleywood North & Sarratt Ward	

We are a non-stock holding authority, so we do not hold a stock list broken down by Parish.

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2025 and 31 March 2026; and between 1 April 2024 and 31 March 2025 in the following locations:

Location	Social Housing Lettings	
	1 April 2025 to 31 March 2026	1 April 2024 to 31 March 2025
Chorleywood North & Sarratt Ward	1	0

Temporary Accommodation

9. The number of households housed in temporary accommodation within and outside the Three Rivers District region on the following dates:

Households in Temporary Accommodation	31 March 2026	31 March 2025
Households Housed within Three Rivers District	44	48
Households Housed outside Three Rivers District	2	12
Total Households	46	60

10. The amount of money spent on temporary accommodation per household within the Three Rivers District Council area over the following periods:

- 1 April 2025 to 31 March 2026.

We are unable to provide an accurate figure for this as we own our own temporary accommodation and charge rent via housing benefit. However, it is managed by Watford Community Housing to whom we pay an annual management fee - £196,763. Nightly let prices vary by property, by night.

11. The amount of money spent on temporary accommodation per household outside the Three Rivers District Council area over the following periods:

- 1 April 2025 to 31 March 2026.

We are unable to provide an accurate figure for this as we own our own temporary accommodation and charge rent via housing benefit. However, it is managed by Watford Community Housing to whom we pay an annual management fee - £196,763. Nightly let prices vary by property, by night.

Housing Completions

12. The number of **NET** housing completions in the Three Rivers District Council area broken down on a per annum basis for the period between 2000/01 and 2025/26.

Please see document titled "Net completions per year".

13. The number of **NET** affordable housing completions in the Three Rivers District Council area broken down on a per annum basis for the period between 2000/01 and 2025/26.

Please see attached a PDF titled "Number of Affordable Completions 2000-2026" with the total number of affordable completions within the district between 1 April 2000 and 31 March 2026.

14. The number of **NET** housing completions in Chorleywood North & Sarratt Ward broken down on a per annum basis for the period between 2000/01 and 2025/26.

We only hold information from 2001/02 – 2019/20. Please see attached document titled "Net completions by Ward – Chorleywood North and Sarratt".

15. The number of **NET** affordable housing completions in Chorleywood North & Sarratt Ward broken down on a per annum basis for the period between 2000/01 and 2025/26.

We do not have information pertaining to the number of **NET** affordable housing completions in the Chorleywood North and Sarratt Ward specifically. Please see the document referenced in the response to question 13.

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: a) Social rent; b) Other affordable housing for rent; c) Discounted market sales housing; and d) Other affordable routes to home ownership. ^[1]
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.

Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

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

Kind regards,

Leonie Stoate BSc (Hons) MSc MRTPI

Principal Planner

Tetlow King Planning



Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol,
BS165EL

E: leonie.stoate@tetlow-king.co.uk

T: 0117 9561916

M: 07517 106104

W: tetlow-king.co.uk



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^[1] As defined by Annex 2 of the National Planning Policy Framework (2024) which can be viewed [here](#).

Year	Net completions
00/01	132
01/02	365
02/03	223
03/04	138
04/05	73
05/06	197
06/07	335
07/08	254
08/09	331
09/10	48
10/11	107
11/12	185
12/13	176
13/14	142
14/15	285
15/16	215
16/17	144
17/18	264
18/19	149
19/20	406
20/21	99
21/22	154
22/23	204
23/24	219
24/25	376
25/26	Data not yet available

Net Completions by Ward - Chorleywood North and Sarratt

Borough/District Name Three Rivers

Res Completions (inc Losses) between

Ward Name	Ward ONS Code	Total Net Completions	Net Completions																		
			2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Chorleywood North & Sarratt Ward	E05009427	254	9	9	3	5	26	16	11	11	-2	19	5	13	13	0	18	5	6	4	10

Housing Allocations Policy comparison document

Brief table detailing the changes between the two policies

Allocations Policy 2013	Allocations Policy 2020	Rationale for change
Residency local connection established through current and five years continuous residence.	Residency local connection criteria established through current residence and have lived in TRDC five out of six years (excluding time spent in temporary accommodation).	To allow customers who have moved out of the district for a period of up to but no more than one year in a six year period to establish a residency local connection. Examples could include temporarily moving due to employment or to look after family members living in another local authority area.
Family local connection where an immediate family member (parents, adult children, adult siblings) is currently resident and has continuously been a resident within the district for at least ten years.	Family local connection where an immediate family member (parents, adult children, adult siblings) is currently resident and has continuously been a resident within the district for at least ten years. The customer must have a relationship with that family member and a need for their support, at the point of application and point of offer of any accommodation.	To take into consideration the nature of a family association and the specific need for a customer to move to the district to be near family support. The current policy simply stipulates that a customer must have a family connection, regardless of the nature of a relationship nor whether there is a need or not to move into the district.
Employment local connection established through being employed in the district for a minimum of 24 hours per week for at least the last 12 months.	Removal of employment local connection criteria. Inclusion of 'Right to Move'. Customers with a 'Right to Move' are exempt from the local connection qualifying criteria. This includes customers who need to move to the district to take up employment or an offer of employment who would suffer hardship if they do not do so.	There is no statutory requirement to include an employment local connection. This is now covered by the 'Right to Move'. The 'Right to Move' is statutory guidance from the Government. This incorporates the need for a customer being required to move to the district for employment purposes to avoid financial hardship.
No specific exemption to the local connection qualifying criteria for victims of domestic abuse.	Victims of domestic abuse are exempt from the local connection qualifying criteria.	This is in accordance with Government guidance, recognising that victims of domestic abuse may need to

		move areas to ensure they are free from risk of harm.
The following groups of people are exempt from the local connection qualifying criteria: • a person having serviced in the Regular Forces; • a bereaved spouse or civil partner of someone service in the Regular Forces where the bereaved spouse or civil partner is no longer entitled to reside in military accommodation due and the death of their spouse or partner was whole or partly attributable to their service; • a person who is an existing or former member of the Reserve Forces and are suffering from a serious injury or illness which is wholly or partly attributable to their service.	The following groups of people are exempt from the local connection qualifying criteria: • a member or former member of the Regular Armed Forces and the application is made within five years of discharge (includes bereaved spouses and civil partners leaving service family accommodation provided by the Ministry of Defence following the death of their partner); • a divorced or separated spouse or civil partner of a Regular Armed Forces member who need to move out of accommodation provided by the Ministry of Defence due to relationship breakdown; • an adult child of a serving Regular Armed Forces member who is no longer able to remain in the family accommodation provided by the Ministry of Defence.	To reflect new Government guidance to ensure that estranged spouses, civil partners and adult children of serving personnel are not disadvantaged when applying for social housing. Members or former members of the Armed Forces who lived in the district for 12 months immediately prior to enlisting will continue to be awarded a minimum Band C priority.
Customers who did not meet the local connection criteria and registered prior to January 2013 could remain on the Housing Register prioritised in Band D.	Only customers with a local connection as defined in Housing Allocations Policy 2020 qualify to remain on the Housing Register.	To remove a 'two-tier' system on the Housing Register, of one set of rules applying to customers who applied to join the Housing Register before the local connection qualifying criteria was introduced (2013) and another set of rules for customers who applied after.
Worker priority (12 months band start date backdate) is awarded to customers who are currently employed for at least 24 hours a week and have been for 12 months.	Worker priority remains, but working priority also awarded to customers who are unable to work due to illness or disability.	To ensure customers who are unable to work due to an illness or disability are not disadvantaged by the worker priority.

A couple making a joint application, their combined employment is 24 hours a week to be eligible for 12 month back date.	A couple making a joint application, their combined employment is 37 hours a week to be eligible for 12 month back date.	To acknowledge a couple who are both able to work will have greater capacity to work the equivalent of one full time job (37 hours) than a single person. This is particularly the case for customers who have caring or childcare responsibilities.
An unborn child is not considered part of a customer's household.	An unborn child will be considered as part of a customer's household four weeks prior to estimated due date.	In most cases a Registered Provider will not accept a nomination if a customer is expecting a new child where this would change the size of the property they need. This change acknowledges this, allowing a customer to bid for the property size they will need once an unborn child is born.
Customers with a gross income of over £35,000 are considered to have financial means to resolve their own housing need.	Customers with a gross income of over £60,000 are considered to have financial means to resolve their own housing need.	To reflect the increasing property prices and typical private rented sector rent charge in the district. In July 2020 the median rent charge for a three bedroom property is approximately £1,500. It is recommended that a household should spend no more than 30% of their gross income on rent. To afford a typical three bedroom property and resolve their own housing need, a household would need a minimum gross income of £60,000 pa.
Housing Register applications are verified at the point of application and the point of offer. A customer must provide all relevant documentation prior to being made live on the Housing Register.	Housing Register applications are verified at the point of offer. Customers are requested to provide relevant documentation at the point of application, but this is not checked until a customer is nominated for a property.	Due to the high demand for social housing, most customers who make an application to join the Housing Register will not be successful in bidding for a property. This change will improve officer efficiency, by officers only verifying those who are nominated to a Registered Provider for an offer, rather than all customers applying to join the Housing Register.

Non-dependent children living with a customer are considered part of a customer's household.	Non dependent children are not considered part of a customer's household unless they are unable to live independently due to care or support needs.	A non-dependent child is typically considered a child who is over the age of 18 and no longer in secondary education (including sixth-form or college). This change will allow the Council to make best use of the social housing stock in the district. Non-dependent children who are unable to live independently due to care or support needs will continue to be part of a customer's household.
Properties are advertised through Herts Choice Homes.	The Council is no longer part of Herts Choice Homes Consortium. Properties are advertised through Home Connections.	The Herts Choice Homes Consortium disbanded in 2018. The Council changed the housing software system used to administer lettings.
Certain groups of social housing tenants living in a property smaller than their housing need are awarded a five year backdate to their band start date.	No additional priority awarded to these groups of social housing tenants.	Additional priority is currently given to certain groups of social housing tenants over customers in exactly the same housing situation but renting in the private rented sector. These groups of people typically include social housing tenants who have been awarded priority due to living in 'over-crowded' housing. The housing need of customers in either tenure (social housing and private rented housing) does not differ. Removing the additional priority ensures the banding scheme reflects this.
Banding system changes	Applicants living in accommodation and a hazard awareness notice has been served awarded Band D.	To recognise a customer is living in a property where a health and safety issue has been identified and raised with the landlord.

	Customers owed a Prevention Duty awarded Band D. Customers owed a Relief Duty with a priority need awarded Band C. Customers owed a Relief Duty without a priority need awarded Band D.	New priority has been introduced to incorporate the new Prevent and Relief duties introduced in the Homelessness Reduction Act.
Composite needs not recognised by the banding scheme.	The introduction of composite needs. One composite need must be medical priority.	Composite needs recognises that a customer may have two separate housing needs of 'equal priority' which can result in having an overall greater housing need than another customer with just one housing need. For example a customer could be awarded Band C medical priority and Band C overcrowding priority. The current policy would award Band C priority; however composite needs recognises they have an overall greater priority and they would instead be awarded Band B priority. Customers with two separate Band D (including medical) needs will be awarded Band C. Customers with two separate Band C (including medical) needs will be awarded Band B. However customers with two separate Band B needs will not be awarded Band A. Customers in Band A typically have such an urgent need to move that the highest possible priority is awarded. This would not be applicable to customers with two separate Band B needs.

Housing Allocations Policy comparison document

Brief table detailing the changes between the existing and proposed policies

Allocations Policy 2022	Allocations Policy 2025	Rationale for change
1.5 Service Standards The service you can expect from our Housing Team can be found on the Council's website.	To be deleted.	Service standards are no longer posted on the council's website.
2.2.1 Local Connection To be considered as having a local connection to TRDC, at least one of the following criteria must apply: • have current residence (by choice) in the district and have lived in the district for at least five of the last six years, excluding any time spent in temporary accommodation. This requirement applies at the point of application and the point of offer; • have an immediate family member (parents, adult children, adult siblings) who is currently resident and has continuously been a resident within the district for at least ten years. The customer must have a relationship with that family member and a need for their support or to provide support to that family member. The Council would consider a need for support to be a formal care requirement, significant childcare needs or the need to assist in the care of a child with high complex needs. This requirement applies at the	2.2.1 Local Connection To be considered as having a local connection to TRDC, at least one of the following criteria must apply: • have current residence (by choice) in the district and have lived in the district for at least five of the last six years, excluding any time spent in temporary accommodation. This requirement applies at the point of application and the point of offer; • have an immediate family member (parents, adult children, adult siblings) who is currently resident and has continuously been a resident within the district for at least ten years. The customer must have a relationship with that family member, a need for their support or to provide support to that family member and must demonstrate that the distance they currently travel to provide this support is unreasonable or creates a barrier to delivering effective care or assistance. The Council would consider a need for support to be a formal care requirement, significant childcare needs, the need to assist in the care of a child with high complex needs. This	The Council will retain local connection criteria for those supporting long-standing family members in the district. A new procedure will assess if applicants living nearby qualify, considering travel distance, transport access, and level of support provided.

point of application and the point of offer.	requirement applies at the point of application and the point of offer.	
The following are listed in Section 2.2.1 of the Policy as having an exemption to the local connection criteria - - those who are currently serving in the Regular Armed Forces or who were serving in the Regular Forces at any time in the five years preceding their application for an allocation of social housing; - bereaved spouses or civil partners of those serving in the Regular Forces where (i) the bereaved spouse or civil partner has recently ceased, or will cease, to be entitled to reside in Ministry of Defence accommodation following the death of their Service spouse or civil partner, and (ii) the death was wholly or partly attributable to their service; - serving or former members of the Reserve Armed Forces who are suffering from a serious injury, illness or disability which is wholly or partly attributable to their service; • a member or former member of the Regular Armed Forces and the application is made within five years of discharge (includes bereaved spouses and civil partners leaving accommodation provided by the Ministry of Defence following the death of their partner); - a divorced or separated spouse or civil partner of a Regular Armed Forces member who needs to move out of	Section 2.2.2 Armed Forces Exemptions All Armed Forces veterans, irrespective the length of Service or when this Service ended, are exempt from local connection criteria to join the council's Housing Register. This includes: - Current serving members of the Armed Forces; - Former members of the Armed Forces; - Bereaved spouses or civil partners of Armed Forces members, where the death was attributable to service; - Adult children of serving Armed Forces members who need to move out of family accommodation.	The exemptions for Armed Forces members (and families) will be removed from Section 2.2.1 and a new section will be added (Armed Forces Exemptions) that clarify the exemptions to the local connection criteria for this cohort. These changes have been made to reflect new Government guidance on the local connection criteria for this cohort, released in December 2023. This updated guidance removes any reference to length of Service.

accommodation provided by the Ministry of Defence due to a relationship breakdown; • an adult child of a serving Regular Armed Forces member who is no longer able to remain in family accommodation provided by the Ministry of Defence		
2.2.2 Housing Need – A customer may be considered to have a housing need if they or a member of their household has a medical condition or disability that is affected by their current housing situation. A customer will be required to complete an online medical form and provide supporting documentation dated within the last 12 months. Medical needs will be assessed and may be referred to an Independent Medical Advisor for a recommendation on whether medical priority should be awarded.	2.2.3 Housing Need – A customer may be considered to have a housing need if they or a member of their household has a medical condition or disability that is affected by their current housing situation. A customer will be required to complete an online medical form and provide supporting documentation dated within the last 12 months. Medical needs will be assessed and may be referred to an Independent Medical Advisor for a recommendation on whether medical priority should be awarded. Should a recommendation on medical priority be provided by the council's independent medical advisor, any decision to award medical priority to the application will be taken by the council's Housing Solutions Manager.	This additional text has been added to ensure alignment with our current procedures on the award of medical priority banding to a customer.
2.2.2 Housing Need – ‘However, there is an exception for customers over 60 years of age with a local connection who do not have a housing need. These customers will only be considered for age restricted properties and only prioritised in Band E.’	2.2.3 Housing Need – ‘However, there is an exception for customers over 55 years of age with a local connection who do not have a housing need. These customers will only be considered for age restricted properties and only prioritised in Band E.’	The age has been changed within this exception to 55 from 60. This reflects the fact that most Registered Providers will now accept those aged 55 and over for age restricted properties.

2.2.3 Home Ownership Most customers who own a property will not be considered to have a housing need as they have sufficient financial means to resolve their housing and will not qualify to join the housing register. Applications from customers who own a property but are experiencing financial hardship which may result in them losing their home will be considered on an individual basis.	2.2.4 Home Ownership Most customers who own a property will not be considered to have a housing need as they have sufficient financial means to resolve their housing and will not qualify to join the housing register. Applications from customers who own a property but are experiencing financial hardship which may result in them losing their home will be considered on an individual basis, however, these customers must be engaging with the council's Housing Options team.	The council may be able to prevent the homelessness of a customer who own's a property but are experiencing financial hardship which may result in them losing their home with early intervention. Therefore, to be considered for access to the Housing Register in these circumstances, it is appropriate to require the engagement from this customer with the Housing Service due to their threat of homelessness.
3.8 Home Visits A customer may be visited at their home prior to an offer to confirm their circumstances. Home visits may be conducted at short notice and the customer will have to ensure that they are available; otherwise, an offer of accommodation may not be made. If a customer does not have any settled accommodation, a visit may be made to the address provided on the application form.	3.8 Home Visits A customer may be visited at their home prior to an offer to confirm their circumstances. Visits can be scheduled, requested at short notice, or conducted unannounced. If a customer is unavailable for a scheduled visit, the accommodation offer will be subject to reconsideration. If a customer does not have any settled accommodation, a visit may be made to the address provided on the application form. These visits are essential, with access granted to all areas of the property as part of this verification process.	These visits already take place; this policy change simply clarifies that they may be unannounced. Verifying application details is essential to ensure accuracy, transparency, and that any housing offer is based on reliable information about the applicant's current circumstances.
4.2 Additional Priority For customers that must be awarded reasonable preference (4.1) and have urgent housing needs, they	4.2 Additional Priority The following customers that must be awarded reasonable preference (4.1) and have urgent housing needs, will	This section has been amended to align with new guidance; however, the Council is only

may also receive additional priority in the following circumstances: • currently serving in the regular forces and suffering from a serious injury, illness or disability which is attributable to that service; • has formerly served in the regular armed forces; • has recently ceased or will cease to be entitled to reside in accommodation provided by the Ministry of Defence following the death of a spouse or civil partner who served in the regular forces and whose death was attributable to that service; • has served or is serving in the reserve forces and is suffering from a serious injury, illness or disability which is attributable to that service.	receive a Band C priority on the council's Housing Register – • currently serving in the regular forces and suffering from a serious injury, illness or disability which is attributable to that service; • has formerly served in the regular armed forces; • has recently ceased or will cease to be entitled to reside in accommodation provided by the Ministry of Defence following the death of a spouse or civil partner who served in the regular forces and whose death was attributable to that service; • has served or is serving in the reserve forces and is suffering from a serious injury, illness or disability which is attributable to that service.	required to grant 'additional' priority. As part of our review into best practice for Armed Forces veterans engaging with the Housing Service, the Council propose granting a Band C priority to this cohort in these circumstances.
4.2 Additional Priority A customer may be awarded additional priority if one or more of the criteria below are met. This will be awarded by backdating their band start date by 12 months. • For sole applications, a customer has been employed for at least 12 months for a minimum of 24 hours per week; • for joint applications, both customers have been employed for at least 12 months for a minimum of 37 hours per week;	4.2 Additional Priority A customer may be awarded additional priority if one or more of the criteria below are met. This will be awarded by backdating their band start date by 12 months. • For sole applications, a customer has been employed for at least 12 months for a minimum of 24 hours per week; • for joint applications, both customers have been employed for at least 12 months for a minimum of 37 hours per week;	As part of our review into best practice for Armed Forces veterans engaging with the Housing Service, it is proposed to grant this additional priority, by backdating the band start date of a customer in this cohort, to recognise their service to the country.

• a customer is unable to work due to medical issues and has been unable to work for the last 12 months. Evidence must be provided from the DWP that a customer is receiving the support component of ESA or they have proof from the DWP stating that they have been assessed and are unable to work. As applications are verified at the point of offer, the onus will be on a customer to provide evidence of the above should it apply. If evidence is not provided a customer Housing Allocations Policy will not receive this additional priority. Customers will be advised of this requirement when making their online application. Backdates in priority will not be awarded should a customer not provide the necessary evidence when applicable.	• a customer is unable to work due to medical issues and has been unable to work for the last 12 months. Evidence must be provided from the DWP that a customer is receiving the support component of ESA or they have proof from the DWP stating that they have been assessed and are unable to work. A customer who has served in the Armed Forces who has joined the Housing Register as they have a housing need, however, are not currently homeless, will be awarded additional priority. This priority will be awarded by backdating their band start date by 2 years. As applications are verified at the point of offer, the onus will be on a customer to provide evidence of the above should it apply. If evidence is not provided a customer Housing Allocations Policy will not receive this additional priority. Customers will be advised of this requirement when making their online application. Backdates in priority will not be awarded should a customer not provide the necessary evidence when applicable.	
5.2 Domestic Abuse	The Domestic Abuse Caseworker role to be mentioned within Section 5.2 of the council's Housing Allocation Policy. Customers engaging with the Council's Domestic Abuse Caseworker who have experienced domestic abuse may be awarded welfare priority. Where appropriate, information may be requested	To confirm to customers that the Council employs a specialist Officer to provide support to victims of domestic abuse engaging with the Council.

	from relevant professionals supporting a customer.	
5.10 Extra Room for a Carer If an extra room is required for a carer, supporting documentation must be provided stating that a live in carer is required for the customer's care needs. This information must satisfy the Housing Supply Team. This may be referred to the Council's Independent Medical Advisor.	5.10 Extra Room for a Carer If an extra room is required for a carer, supporting documentation must be provided stating that a live in carer is required for the customer's care needs. This information must satisfy the Housing Supply Team. This may be referred to the Council's Independent Medical Advisor. If an additional bedroom is approved by the Housing Solutions Manager, the customer must provide evidence that they receive the benefits needed to cover its cost, to ensure affordability if they become benefit dependent. This evidence must be submitted before they can bid on larger properties.	This clarification has been added to help customers understand the affordability criteria set by our Registered Providers. Whilst a working household may be able to afford a larger property without any help from any benefit entitlement, Registered Providers will not accept a nomination for a property with an extra bedroom to the household's requirement unless that household is eligible to receive the relevant benefits to cover the rental amount. In the event that the household becomes benefit dependant in the future, without the correct benefit entitlement within the household, the extra rental amount required to cover the additional room in the property would not be provided, therefore, making the property unaffordable for the household.
5.11 Ground Floor Flats Priority for ground floor flats may be given to customers in Bands A to C with a medical need for ground floor accommodation. This will be clearly stated in the advert.	5.11 Ground Floor Flats Priority for ground floor flats may be given to customers in Bands A to C with a medical need for ground floor accommodation. This will be clearly stated in the advert. If priority is granted for ground floor accommodation, the customer will only be considered for	This additional text has been included to improve clarity for customers. The Council has had a number of applications where ground floor priority has been awarded to an application where the customer has attempted to debate with Officers that whilst they are unable to manage an external staircase, they are

	accommodation of this type (no external or internal stairs)	able to manage internal staircase. The purpose of this priority is to identify those customers who require ground floor, step free accommodation, not those who 'may' be able to use internal stairs. Therefore, this addition is required.
The council's Senior Housing Options Officer is referred to throughout the Policy	Wherever this title is mentioned it has been changed to the council's Housing Solutions Manager.	Title changed to reflect the new title of this role .
No exception to the local connection criteria for care leavers	Care leavers under the age of 25 will have an exemption to the council's local connection criteria.	Added to ensure adherence to updated Government legislation

Colleagues from our Housing department and Planning Policy department have provided the information which has been added to your e-mail below.

Regards

Phil King
Freedom of Information Officer
Ref: 8524-0624

Three Rivers District Council
www.threerivers.gov.uk

From: Lisa Luong <lisa.luong@tetlow-king.co.uk>
Sent: Wednesday, May 29, 2024 5:04 PM
To: FOI (Three Rivers) <foi@ThreeRivers.gov.uk>
Cc: James Stacey <James.Stacey@tetlow-king.co.uk>; Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Subject: Freedom of Information request

Dear Sir / Madam,

I hope this email finds you well. I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in Chorleywood North & Sarratt Ward, as well as the Three Rivers District Council area.

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

Confirmation of receipt would be greatly appreciated.

Freedom of Information Request

Questions 1 to 11 of this request relate to data held by the Housing Department.
Questions 12 to 15 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2024.

1,310

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

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

We cannot provide realistic waiting times as we operate a choice based letting system rather than a traditional waiting list. Customers bid on properties of choice in geographical areas of choice. We verify at point of offer so some accounts may also be inactive.

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

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

We cannot provide realistic waiting times as we operate a choice based letting system rather than a traditional waiting list. Customers bid on properties of choice in geographical areas of choice. We verify at point of offer so some accounts may also be inactive.

4. The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2024)
Chorleywood North & Sarratt Ward	

Customers are not asked to specify their preferred choice of location as part of the application process, so we are unable to provide this information.

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Chorleywood North & Sarratt Ward	
	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling	1	42
2-bed affordable dwelling	0	N/A
3-bed affordable dwelling	0	N/A
4+ bed affordable dwelling	0	N/A

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

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

Changes in 2013, 2020 and 2022 – see attached documents.

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2024 in the following locations:

Location	Total Social Housing Stock (31 March 2024)
Chorleywood North & Sarratt Ward	84 properties

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	Social Housing Lettings	
	1 April 2022 to 31 March 2023	1 April 2023 to 31 March 2024
Chorleywood North & Sarratt Ward	2	1

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Three Rivers District Council on the following dates:

Households in Temporary Accommodation	31 March 2023	31 March 2024
Households Housed within Three Rivers District Council	51	57
Households Housed outside Three Rivers District Council	10	16
Total Households	61	73

10. The amount of money spent on temporary accommodation per household within the Three Rivers District Council over the following periods:
- 1 April 2023 to 31 March 2024.

No spend as this is all our own temporary accommodation.

11. The amount of money spent on temporary accommodation per household outside the Three Rivers District Council over the following periods:
- 1 April 2023 to 31 March 2024.

£173,149 total spend across the year on nightly lets and hotels. We are unable to report the specific costs associated with each household.

Housing Completions

12. The number of NET housing completions in the Three Rivers District Council broken down on a per annum basis for the period between 2000/01 and 2023/24.

	01/02 - 08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Completions (net)	1926	48	107	185	176	142	285	215	144	264	149	406	99	154	204	260
Affordable Comps (net)	498	0	25	55	39	48	93	85	0	90	22	82	91	34	61	3

For a breakdown of housing completions per annum for the years prior to 09/10, please view previous Annual Monitoring Report's, available at <https://www.threerivers.gov.uk/services/planning/planning-policy/monitoring>. The AMR for the period 2010/2011 is suggested.

Please note the above relates to financial years.

13. The number of NET affordable housing completions in the Three Rivers District Council broken down on a per annum basis for the period between 2000/01 and 2023/24.

	01/02 - 08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Completions (net)	1926	48	107	185	176	142	285	215	144	264	149	406	99	154	204	260
Affordable Comps (net)	498	0	25	55	39	48	93	85	0	90	22	82	91	34	61	3

For a breakdown of affordable housing completions per annum for the years prior to 09/10, please view previous Annual Monitoring Report's, available at <https://www.threerivers.gov.uk/services/planning/planning-policy/monitoring> The AMR for the period 2010/2011 is suggested.

Please note the above relates to financial years.

14. The number of NET housing completions in Chorleywood North & Saratt Ward broken down on a per annum basis for the period between 2000/01 and 2023/24.

2001/2002 = 9
2002/2003 = 9
2003/2004 = 3
2004/2005 = 5
2005/2006 = 26
2006/2007 = 16
2007/2008 = 11
2008/2009 = 11
2009/2010 = -2
2010/2011 = 19
2011/2012 = 5
2012/2013 = 13
2013/2014 = 13
2014/2015 = 0
2015/2016 = 18
2016/2017 = 5
2017/2018 = 6
2018/2019 = 4
2019/2020 = 11
2020/2021 = 9
2021/2022 = 40
2022/2023 = 4
2023/2024 = 13

Please note the above relates to financial years.

15. The number of NET affordable housing completions in Chorleywood North & Saratt Ward broken down on a per annum basis for the period between 2000/01 and 2023/24.

According to our records there have been no affordable housing completions within the Chorleywood North & Saratt Ward between 2000/01 and 2023/24.

■

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: a) Affordable housing for rent b) Starter Homes c) Discounted market sales housing; and d) Other affordable routes to home ownership. ^[1]
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

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

Kind regards,

Lisa Luong BSc (Hons) MSc
Planner
TETLOW KING PLANNING



E: lisa.luong@tetlow-king.co.uk **T:** 0117 9561916 **M:** 07933 821572 **W:** tetlow-king.co.uk

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^[1] As defined by Annex 2 of the National Planning Policy Framework (2023) which can be viewed [here](#).

Appendix JS2

Relevant NPPF Extracts



Relevant NPPF Extracts

Appendix JS2

National Planning Policy Framework (12 December 2024)

- 1.1 The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-taking processes.
- 1.2 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) 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.*” (My emphasis).
- 1.3 At the heart of the NPPF is the presumption in favour of sustainable development contained at paragraph 11. Under paragraph 11c, proposals which accord with an up-to-date development plan should be approved without delay. Under paragraph 11d, where the most important policies are out of date, permission should be granted unless the policies in the NPPF provide a strong reason for refusal, or where any adverse impacts of the scheme significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.
- 1.4 The December 2024 revisions to the NPPF expand the decision-taker’s assessment under paragraph 11d to have “*particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination*” (my emphasis). In doing so, the **NPPF now makes affordable housing a central part of applying the presumption to which the decision-taker must have particular regard.**
- 1.5 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:

“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing

requirements are addressed [...] **The overall aim should be to meet an area's identified housing need,** including with an appropriate mix of housing types for the local community." (My emphasis).

- 1.6 It should be stressed that paragraph 61 identifies the 'overall aim' as to meet an area's identified housing need. Paragraph 62 clarifies that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."*
- 1.7 Paragraph 63 also makes clear that *"within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent)..."* (My emphasis).
- 1.8 The NPPF places a core responsibility on all major developments (involving the provision of housing) to provide affordable housing. In particular, paragraph 66 establishes that *"where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures."*
- 1.9 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *"housing for sale or rent, for those whose needs are not met by the market [...] and which complies within one or more of the following definitions"* before identifying four categories of affordable housing: Social Rent in accordance with Government's conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, 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).

National Planning Policy Framework Consultation (December 2025)

- 1.10 On 16 December 2025 the Ministry of Housing, Communities, and Local Government opened a consultation on proposed changes to the planning system, including the National Planning Policy Framework. The consultation is scheduled to close at 11:45 on 10 March 2026. The consultation draft of the revised NPPF is a material

consideration but carries limited weight owing to the inherent uncertainty as to whether the consultation draft will be adopted in whole or in part.

- 1.11 The draft December 2025 NPPF places additional emphasis on the delivery of affordable housing, within the context of the wider proposed changes to the planning system which seek to make *'planning policy easier to use, underpin the development of faster and simpler local plans, and be more directive of decision-making in support of both appropriate housing and commercial development ...'*
- 1.12 HO5 (meeting the needs of different groups) requires development plans to includes policies that set requirements for the type and mix of affordable housing *'required to meet identified needs'*.
- 1.13 HO8 (providing affordable homes) establishes that development proposals are expected to *'meet or exceed up-to-date development plan requirements'* for the relevant mix of affordable housing tenures.

Appendix JS3

Planning Practice Guidance Extracts



Extracts from Planning Practice Guidance

Appendix JS3

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-006-20241212	This section sets out that assessments of housing need should include considerations of and be adjusted to address affordability. This paragraph sets out that <i>“an affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need.”</i> This is because: <i>housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed</i> <i>people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.</i> <i>“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”</i>
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	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> <i>the number of homeless households;</i>

		• <i>the number of those in priority need who are currently housed in temporary accommodation;</i> • <i>the number of households in over-crowded housing;</i> • <i>the number of concealed households;</i> • <i>the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i> • <i>the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."</i>
Housing and Economic Needs Assessment	024 Reference ID 2a-02420190220	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>. It also details that: <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>
Housing Supply and Delivery	022 Reference ID: 68-031-20190722	With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states: <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 Sedgfield approach)..."</i>
Housing Needs of Different Groups	001 Reference ID: 67-001-20190722	Sets out the relationship between affordable housing need and overall housing need: <i>"This need [for specific groups of people] may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method."</i>

Appendix 4

Relevant Written Ministerial Statement Extracts



Relevant Written Ministerial Statement Extracts

Appendix JS4

***“Social and Affordable Housing Renewal”* Written Ministerial Statement (2 July 2025) (CD7.12)**

- 1.1 The Government has sought to bolster affordable housing delivery through the new Social and Affordable Homes Programme, which provides a £39bn funding package over the ten years from 2026/27 to 2035/36. This WMS acknowledges that *“Ending England’s acute and entrenched housing crisis will be a painstaking and laborious effort that will require focus, energy, and determination over many years”*.
- 1.2 The funding settlement includes new measures in respect of capital funding, access to finance, and rent-raising abilities, so that Registered Providers are better able to deliver affordable housing and to invest in affordable homes delivered through Section 106 planning obligations. The WMS outlines the objective to *“significantly improve the capacity of Registered Providers, enabling them to borrow and invest in new and existing homes. We also expect that improved financial capacity will see Registered Providers reassess their position in respect of uncontracted and unsold Section 106 units across the country”*.

***“Building the Homes We Need”* Written Ministerial Statement (30 July 2024) (CD7.13)**

- 1.3 On 30 July 2024, the then-Secretary of State, Angela Rayner MP, delivered a Written Ministerial Statement (“WMS”) indicating the ‘direction of travel’ for the new Government’s intentions for national planning policy.
- 1.4 The WMS set out the Government’s aspirations to drive the delivery of affordable homes, stating that *“the Government are committed to the biggest growth in social and affordable housebuilding in a generation”* and setting an objective to deliver 1.5 million homes during the current Parliament.

“Building the Homes We Need” Written Ministerial Statement (12 December 2024) (CD7.14)

- 1.5 In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government’s objective to deliver 1.5 million homes during the current Parliament and made a series of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

“This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters’ income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.” (my emphasis)

“Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing” Written Ministerial Statement (12 February 2025) (CD7.15)

- 1.6 Another WMS from Matthew Pennycook MP once again references the scale of the housing crisis, but places specific emphasis on affordable housing, alongside the ambition to *“deliver the biggest increase in social and affordable housebuilding in a generation”*:

“England is in the grip of an acute and entrenched housing crisis. The detrimental consequences of this disastrous state of affairs are now all pervasive. We have a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into insecure, unaffordable and far too often sub-standard private rented housing; and 160,000 homeless children living in temporary accommodation.

Among the most important causes of the housing crisis is a failure over many decades to build enough homes of all tenures to meet housing demand and housing need.”

Appendix 5

Summary of the National Housing Crisis



Summary of National Housing Crisis

Appendix JS5

1.1 A debate took place in the House of Commons on 24 October 2013 **(CD7.16)** concerning the issue of planning and housing supply. Despite the debate taking place over a decade ago the issues remain, and the commentary is sadly still pertinent to the issues surrounding affordable housing in Cotswold District Council.

1.2 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.”

1.3 When asked to clarify the word “*crisis*” by the MP 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*”.

1.4 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”.

1.5 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.”

- 1.6 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.
- 1.7 Mr Boles indicates that there are “*a lot of statistics to prove it*”. My evidence in subsequent sections sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now as it did in 2013.
- 1.8 Moving forward over a decade and a new Government, we see even more alarming comments from the Housing Minister, Matthew Pennycook. On 20 November 2024, the Minister addressed the Housing, Communities and Local Government Committee: He began with a powerful reminder:

“We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates.”

- 1.9 He went on to say:

It is not just the lives it blights; it is also the impact on our economy. We are all suffering. The public services we rely on, for example, are harmed by the fact that we are consuming ever larger amounts of public money in the form of the rapidly rising housing benefit bill. The situation that we are in also hampers economic growth and productivity. It constrains the ability of our great towns and cities to realise their full potential. We are taking decisive action to tackle the housing crisis and boost economic growth.

- 1.10 The impact on people and the economy is real.

Consequences of Failing to Meet Affordable Housing Need

- 1.11 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.

- 1.12 In August 2019 the Children's Commissioner produced a report titled "*Bleak Houses: Tackling the Crisis of Family Homelessness in England*" (**CD7.17**) to investigate the impact of homelessness and in particular the effect of this upon children.
- 1.13 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms¹.
- 1.14 It stated 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, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
- 1.15 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 stated that "*Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work*" (page 18).
- 1.16 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a "*deeply disruptive impact on family life*" (page 10). This can include lack of support (from grandparents for example) and travel costs.
- 1.17 It found 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.
- 1.18 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety. This is particularly so for 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.
- 1.19 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*".

¹ The Children's Commissioner Report references a National Audit Office Report titled 'Homelessness' (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 1.20 More recently, in May 2021, Shelter published its report “*Denied the Right to a Safe Home – Exposing the Housing Emergency*” (CD7.18) which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that “*we will only end the housing emergency by building affordable, good quality social homes*” (page 10).
- 1.21 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

“Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it’s damp, cramped, or away from jobs and support networks.” (Page 5)

“... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option.” (Page 5)

The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability. (Page 6)

If you live in an overcrowded home, you’re more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer. (Page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding” (Page 12)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%).” (Page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (Page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn.” (Page 25)

“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.” (Page 29)

“The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing.” (Page 30)

- 1.22 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).
- 1.23 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).
- 1.24 In April 2022 Shelter published a further report titled *“Unlocking Social Housing: How to fix the rules that are holding back building” (CD7.19)*. The first paragraph of the Executive Summary is clear that:

“Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings. Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food.”
- 1.25 The Executive Summary goes on to state that **“An affordable and secure home is a fundamental human need”** (emphasis in original) noting that one in three of us don’t

have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

- 1.26 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the 'infrastructure levy'. It states that:

“This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners.” (My emphasis).

- 1.27 In considering the impact of the private rented sector, the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – *“That’s taxpayer money subsidising private landlords providing insecure and often poor-quality homes.”* The paragraph goes on to note that:

“The lack of social housing has not just pushed homeownership out of reach, it’s made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home.”

- 1.28 Regarding temporary accommodation the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has ‘gone through the roof’. The page also notes that *“TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies.”*

- 1.29 Page 11 goes on to highlight that *“Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in.”* This means that *“Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks.”*

- 1.30 The page goes on to conclude that *“As a result, the national housing benefit bill has grown. Tenants’ incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. **There are now more private renters claiming housing benefit than ever before.**”* (emphasis in original).

- 1.31 Page 9 is also clear that *“Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters’ housing benefit simply doesn’t meet the cost of paying the rent.”*
- 1.32 In considering the consequences of this page 12 notes that *“With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution and homelessness.”*
- 1.33 Finally, page 21 is clear that:
- “For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one’s life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory, but also contributes to the threads of society by helping people contribute to their communities.*
- The evidence is clear, the financial requirements to own one’s home are out of reach for many. And many will spend years stuck in a private rented sector that’s not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them.”* (My emphasis).
- 1.34 The consequences of failing to provide enough affordable homes were also recognised by the Inspector in a recent decision in Mole Valley (**CD5.2**) where I provided affordable housing evidence. Inspector McGlone was clear at paragraph 88 of his decision that:
- “The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”*

Appendix 6

Corporate Documents Summary



Corporate Documents Summary

Appendix JS6

Three Rivers Corporate Framework 2026 – 2029 – CD7.6

- 1.1 Councillor Stephen Giles-Medhurst OBE, Leader of Three Rivers District Council states in his foreword that affordable housing is ‘much needed’ in the authority area.
- 1.2 In reviewing housing affordability in Three Rivers District in 2025, the Framework recognises that house prices and rents are significantly above national averages. Page 7 clarifies that *“Housing affordability is a major issue. The council must continue to prioritise working with partners to deliver affordable housing”*.
- 1.3 Furthermore, the council expect that ongoing population growth is expected to drive increased demand for housing across the district, including a greater need for affordable housing options (page 6).
- 1.4 The Framework sets out a number of aims for the Council on pages 14 and 15. This includes to *“Work with developers and housing providers to help increase affordable housing within the district”*.

Three Rivers Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028 – CD7.7

- 1.5 The Strategy opens with a statement from Councillor Andrew Scarth, Lead Member for Housing, Public Health & Wellbeing at Three Rivers District Council, which states that *“As the Lead Member for Housing, I understand the importance that housing plays in the wellbeing of our residents. Ensuring there is a range of housing types is important for individuals and families across the district, from supported housing and affordable rentals to starter homes and larger family homes.”*
- 1.6 On page 5 the Strategy indicates that households on lower incomes have been forced to look beyond Three Rivers to source affordable housing.
- 1.7 The Council has identified three objectives; the first being to prevent and relieve homelessness. In relation to this objective, page 16 notes that *“Although Three Rivers is a largely affluent district, our customers are not immune to the current cost-of-living crisis affecting the country and it is predicted that due to this cost-of-living crisis,*

approaches to the council for housing advice and assistance will increase." (my emphasis).

- 1.8 The Strategy further states on page 16 that *"we [the council] will ensure that we work with their customers to enable them to access affordable, suitable and sustainable accommodation to relieve their homelessness."*

Three Rivers Temporary Accommodation Placement Policy (December 2018, reviewed May 2024) – CD7.8

- 1.9 The Council states at paragraph 2.2 that so far as reasonably practicable, the Council will seek to accommodate customers in the Three Rivers district. Nevertheless, the Council acknowledges the following:

"However due to an acute shortage of available and affordable housing locally and rising rental costs in the private rented sector, a number of customers are likely to be placed outside of the district, as it will not be reasonably practicable to provide accommodation within the district" (my emphasis).

Conclusions on Corporate Documents

- 1.10 The Council has produced an array of strategies and corporate documents, all of which seek to address issues relating to housing and affordable housing in the authority area.
- 1.11 The evidence set out above clearly highlights that within a number of plans and strategies, providing affordable housing is established as, and remains, a key challenge for Three Rivers.

Appendix 7

Affordable Housing as a Separate Material Consideration



Affordable Housing as a Separate Material Consideration

Appendix JS7

- 1.1 Regarding the weight to be attached to the proposed affordable housing benefits at the appeal site, as I set out in my Affordable Housing Hearing Statement, the need is acute, the benefits are considerable, and the weight in the planning balance should be **very substantial**. Affordable housing is a material benefit and should therefore be awarded its own weight in the planning balance.
- 1.2 Many appeal decisions issued by Inspectors and the Secretary of State (“SoS”) have recognised affordable housing as an individual benefit and have specifically awarded affordable housing provision its own weight in the planning balance. Some examples are summarised below.

Appeal Ref.	Site Name	Decision Type	Decision	Date	Para Ref.	Weight to Affordable Housing	Paragraph Text
APP/R3650/W/23/3332590	Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold	Inspector	Allowed	08-May-24	48	Significant	<i>"I note that the Inspector in the 'Knowle Lane appeal' appears to have combined the benefits of market and affordable housing delivery when making his decision. Nonetheless, based on the evidence before me, the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs. Accordingly, the proposed provision of affordable housing also carries its own significant weight in favour of the appeal development."</i>
APP/F2360/W/22/3295498 and APP/F2360/W/22/3295502	Pickering's Farm Site, Flag Lane, Penwortham, Lancashire	SoS	Allowed	20-Nov-23	25	Significant	<i>"For the reasons given at IR343 the Secretary of State agrees that the delivery of a total of some 1,100 homes in a mix of sizes is a significant benefit, to which he gives significant weight. <u>He further agrees that the delivery of affordable housing would be a benefit carrying significant weight.</u>"</i>
APP/C2741/W/21/3282598	Land to the East of New Lane, Huntington, York	SoS	Allowed	17-Oct-23	44	Very significant	<i>"He further agrees that <u>the provision of 30% affordable housing, of a tenure and size to be agreed, would also be a very significant benefit of the scheme (IR380).</u>"</i>
APP/Q3115/W/22/3296251	Land off Papist Way, Cholsey, Oxfordshire	SoS	Dismissed	10-Oct-23	26	Significant	<i>"For the reasons given at IR359 and IR390, the Secretary of State agrees that <u>the benefits of affordable housing which the proposal would provide would comply with SOLP policy H9 and should be afforded significant weight.</u>"</i>
APP/C1570/W/21/3289755	Land East of Highwood Quarry, Park Road, Little Easton, Dunmow	SoS	Allowed	11-Sep-23	34	Great	<i>"For the reasons given at IR535 he agrees that <u>the delivery of affordable housing is a benefit of great weight.</u>"</i>

APP/L5240/W/ 22/3296317	103-111a High Street, Croydon	SoS	Dismissed	06-Apr-23	25	Significant	"For the reasons given at IR153 and IR168, the Secretary of State agrees with the Inspector that affordable housing delivery is a priority, and like the Inspector, <u>he affords the provision of affordable dwellings significant beneficial weight (IR153).</u> "
APP/C2741/W/ 21/3282969	Site to the West of The A1237 and South of North Lane, Huntington, York	SoS	Allowed	14-Dec-22	27	Significant	"For the reasons given at IR178 and IR196, <u>the Secretary of State agrees that delivery of 30% affordable housing would be a further social and economic benefit to which significant weight should be attached.</u> "
APP/M0655/W/ 17/3178530	Land at Peel Hall, Warrington	SoS	Allowed	09-Nov-21	24	Very substantial	" <u>He further agrees (IR524) that the provision of affordable housing attracts very substantial weight, for the reasons given.</u> "
APP/A2280/W/ 20/3259868	Land off Pump Lane, Rainham, Kent	SoS	Dismissed	03-Nov-21	33	Substantial	"...The Secretary of State considers that the weight to be afforded to the delivery of housing in the light of the housing land supply shortfall is substantial (all IR12.201). Similarly, the Secretary of State agrees at IR12.202 that for the reasons given there is an acute need for affordable housing and in light of that, <u>the delivery of at least 25% of the residential units as affordable accommodation attracts substantial weight.</u> "
APP/W1850/ W/20/3244410	Land North of Viaduct adj. Orchard Business Park, Ledbury	SoS	Allowed	15-Mar-21	27	Substantial	"For the reasons given in IR16.122-16.123, the <u>Secretary of State also gives substantial weight to the delivery of affordable housing.</u> "
APP/Y0435/W/ 17/3169314	Newport Road and Cranfield Road	SoS	Dismissed	25-Jun-20	32	Significant	"Weighing in favour of the proposal, the Secretary of State <u>affords the provision of affordable housing significant weight</u> and also affords the provision of market housing significant weight."
APP/E5330/W/ 19/3233519	Land at Love Lane, Woolwich	SoS	Dismissed	03-Jun-20	28	Substantial	"The Secretary of State considers that, in terms of benefits, <u>the provision of housing benefits and affordable housing benefits each carry substantial weight.</u> "
APP/Q3115/W/ 19/3230827	Oxford Brooks University, Wheatley Campus	SoS	Allowed	23-Apr-20	35	Very substantial	35 "...Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, <u>that the delivery of up to 500 houses, 173 of which would be affordable, are considerations that carry very substantial weight.</u> " IR 13.111 " <u>The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight irrespective of the fact that the Council can demonstrate a 3/5YHLS.</u> "
APP/G1630/W/ 18/3210903	Land at Fiddington, Ashchurch near Tewkesbury	SoS	Allowed	22-Jan-20	20	Substantial	"...The Secretary of State agrees with the Inspector, and further considers that the <u>provision of affordable housing in an area with a serious shortfall would be of significant benefit and attracts substantial weight in favour of the proposal.</u> "

APP/A0665/W/14/2212671	Darnhall School Lane	SoS	Dismissed	04-Nov-19	28	Substantial	<i>"The Secretary of State agrees that the social benefits of <u>the provision of affordable housing should be given substantial weight</u>, for the reasons set out at IR408-411."</i>
APP/P4605/W/18/3192918	Former North Worcestershire Golf Club, Hanging Land, Birmingham	SoS	Allowed	24-Jul-19	33	Significant	<i>30 "Weighing in favour the <u>Secretary of State considers that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.</u>"</i>
APP/E2001/W/18/3207411	Hutton Cranswick	Inspector	Dismissed	05-Jun-19	39	Significant	<i>"However, <u>aside from the provision of affordable housing (to which I attach significant weight)</u>, the provisions are essentially intended to mitigate the effect of the development-although they could be of some benefit to the wider public, and I have therefore given them very limited weight."</i>
APP/P0119/W/17/3191477	Coalpit Heath, South Gloucestershire	Inspector	Allowed	06-Sep-18	61	Substantial	<i>"There are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing(CBH). <u>They are all important and substantial weight should be attached to each component</u> 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. <u>The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant –they would still comprise significant social benefits that merit substantial weight.</u>"</i>
APP/L3815/W/16/3165228	Land at the Corner of Oving Road and A27, Chichester	Inspector	Allowed	18-Aug-17	63	Substantial	<i>"Moreover, the provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. <u>Consequently I attach substantial weight to this element of the proposal.</u>"</i>
APP/P1425/W/15/3119171	Mitchelswood Farm, Newick, Lewes	SoS	Allowed	23-Nov-16	18	Significant	<i>"For the reasons given at IR196-201 the Secretary of State agrees that <u>the provision of 20 affordable homes is a tangible benefit of significant weight.</u>"</i>
APP/G1630/W/14/3001706	Cornerways, High Street, Twynning	Inspector	Allowed	13-Jul-15	63	Very substantial	<i>"...Table 7.16 of the Strategic Housing Market Assessment [SHMA] Update [CDA17] identifies that the net annual need for affordable housing in Tewkesbury is 587 dwellings. This is more than twice the equivalent figure for the neighbouring District of Wychavon, despite the fact that Tewkesbury's population is little more than two thirds of that in Wychavon. <u>The Inspector in the Wychavon appeal found that the provision of affordable housing in that case: "...is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission"; the Secretary of State agreed.</u> Given the much larger quantum of identified need in Tewkesbury and the magnitude of the accumulated shortfall in affordable housing delivery, <u>it would be appropriate to attribute very substantial weight to this important benefit of the proposal.</u>"</i>
APP/E2001/A/13/2200981 and	Brickyard Lane, Melton Park, East Riding	SoS	Dismissed	25-Jun-15	11	Substantial	<i>"However, he also agrees with the Inspector's conclusion that <u>substantial weight should attach to the proposals in proportion to the contribution they would make to the supply of affordable housing.</u>"</i>

APP/E2001/A/ 14/221394							
APP/K2420/A/ 13/2208318	Land surrounding Sketchley House, Watling Street, Burbage, Leicestershire	SoS	Allowed	18-Nov-14	13 / IR 6.19	Substantial	13. "For the reasons given at IR11.20-IR11.23, the Secretary of State agrees with the Inspector's findings in relation to affordable housing, and with his conclusion at IR11.23 that the need for affordable housing is acute and warrants the provision offered by the appeal proposal." IR 6.19 "In those circumstances, there is no reason to depart from the statutory basis to providing for affordable housing set out in policy 15 of the Core Strategy. The policy takes account of the needs identified in the SHMA (2008) and was found to be sound by the Core Strategy Inspector. Hence, although <u>substantial weight should be given to the affordable housing</u> offered, that weight should not be overwhelming."
APP/H1840/A/ 13/2199085 and APP/H1840/A/ 13/2199426	Pulley Lane, Droitwich Spa	SoS	Allowed	02-Jul-14	23 / IR 8.126	Very significant	23. "For the reasons given at IR8.112-8.126, the Secretary of State agrees with the Inspector's conclusion at IR8.127 that the Council does not have a 5-year supply of housing land and the appeal scheme is necessary to meet the housing needs of the district, including the need for affordable housing." IR 8.126 "It seems to me that the Council has largely ignored the affordable housing need in its evidence. The poor delivery record of the Council has also been largely overlooked. The Council's planning balance is struck without any apparent consideration being given to one of the most important reasons why housing in Droitwich Spa is needed. From all evidence that is before me the provision of <u>affordable housing must attract very significant weight in any proper exercise of the planning balance.</u>[4.47]"