

To:	Planning Inspectorate obo Inspector Baird
Cc:	
From:	Cameron Austin-Fell
Date:	04 September 2026
Subject	Response to Inspectors Questions (dated 01 September 2026)

Question 3. Why is an Affordable Housing Cascade Mechanism appropriate in this case, given Government policy and the 25 August 2026 consultation?

The Appellant accepts that as a consultation paper, the 25 August policy document carries limited weight. And that it relates to housing proposals up to 49 dwellings. However, this gives a very clear steer on direction of travel from Government in recognising the legitimate role cascade mechanisms have and it is significant that the Government has chosen to recognise this explicitly at this time when there is a very significant problem in finding Registered Providers (RPS) who are willing to take on Section 106 sites.

As this is a consultation document some elements may change, Richborough amongst (expected) others will be responding with the request to firm measures to make cascade provisions mandatory.

The reason for this being to ensure that there is sufficient flexibility in the ability to respond to changing evidence of affordable need, and to be reactive to the requirements of RP's.

It is recognised that sometimes this issue is addressed by a Deed of Variation (DoV). But there are two main problems with them; willingness and timing. On the former, the DoV requires a willingness and agreement from the LPA (in first five years). Even with this and on the second point, the DoV can come with considerable delay and cost. In the Appellant's experience, DoV's are not marked for high priority, and can often take at least six months to agree. Sometimes longer in resource strapped LPAs. If the Council would resist a DoV it means this site could not progress for another 5 years.

We say that the general use of cascades can help to resolve issues where they arise and ensure delivery is not stalled.

The cascade works alongside the MIP to provide that additional layer of protection for affordable units, if no RP's step forward to deliver the 300 affordable units that can be delivered in a timely way.

It is very much hoped that an RP would be found and the agreed methodology means there would be several rounds of it being offered to RPs. The £9.58 billion the Government has

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recently agreed to give to 33 bodies including RPs like Clarion through the Social and Affordable Homes Programme should undoubtedly help with this.

Turning to local factors, as evidenced by Pioneer, there is very clear evidence of significantly reduced local demand from RPs operating in the local market, which would support the use of a cascade for this appeal. The evidence is very local as it relates to the appeal site specifically and major RPs in the area have all made clear their position at the present time. This demonstrates a specific problem impact directly on RPs operating in this area (albeit the problem is widespread).

To be clear however, as set out in the accompanying note from Pioneer (para 1.12), reasonable endeavours will be made to first dispose of AH to RPs. The quantum of affordable housing will be safeguarded.

Question 4 - Little Green Lane boundary: is the existing hedge retained and, where necessary, strengthened?

Acknowledging that the Landscape Strategy is illustrative, the Inspector would like the appellant to explain how the boundary with Little Green Lane is to be treated. Except for where the vehicular and pedestrian accesses are proposed is the existing hedge line to be retained and, if necessary, strengthened.

The hedgerow is proposed to be retained and managed to its current height (around 1.2-1.5m) to maintain a visual link between the existing and proposed houses. The hedgerow is proposed to be retained within a green corridor of open space, with scattered new tree planting incorporated into this open space, and the built development set back behind the corridor of open space. Additional hedge planting will be incorporated in places where there are gaps in the hedge or where it is weak. If required, the hedgerow could be strengthened in places with additional hedgerow or thicket planting.