

TOWN AND COUNTRY PLANNING ACT 1990

**AFFORDABLE HOUSING STATEMENT OF COMMON
GROUND IN RESPECT OF AFFORDABLE NEEDS
AND DELIVERY ACROSS THE MALVERN HILLS
ADMINISTRATIVE AREA**

SECTION 78 APPEAL

**Outline planning permission for up to 55 dwellings
(with means of access to the site be considered at
this stage and all other matters reserved)**

Land at Berrow Green Road, Martley

**On behalf of: Hayfield Homes and Malvern Hills
District Council**

November 2024

PINS REF: APP/W1860/W/24/3348743

LPA REF: M/23/01711/OUT

The following matters are agreed by the parties.

1.0 Affordable Housing Policy

- 1.1 The relevant Development Plan in respect of affordable housing for the appeal site comprises the South Worcestershire Development Plan (2016) ("SWDP") (**CD3.1**). Policy SWDP 15 (Meeting Affordable Housing Needs) requires 40% affordable housing provision on schemes of 15 or more dwellings on greenfield sites.

2.0 Affordable Housing Offer

- 2.1 The appeal proposals seek full permission for up to 55 dwellings, of which 40% are proposed as affordable homes equivalent to 22 affordable homes which meets the requirements of Policy SWDP 15.
- 2.2 The proposed tenure split will be 25% First Homes (up to 6 units) and 69% Social Rented (up to 15 units) and 6% shared Ownership (up to 1 unit), which reflects the requirements of 2021 SHMA update. The proposed affordable housing will be secured by way of a Section 106 planning obligation.

3.0 Affordable Housing Needs

Housing Need Assessments

- 3.1 The 2012 Strategic Housing Market Assessment ("SHMA") (**CD7.8**) outlines at figure 7.3 that Malvern Hills has a need for **131 affordable dwellings per annum**, equivalent to a total of 655 dwellings in the period 2012/13 and 2016/17.
- 3.2 The 2021 SHMA update at Table C7 identifies an ongoing need for **331 affordable dwellings per annum**, equivalent to 3,310 dwellings in the 10-year period between 2021/22 and 2030/31.

Local Housing Need vs Affordable Housing Need

- 3.3 The Government's Standard Methodology for assessing Local Housing Need does not provide a need figure for affordable housing in line with the Planning Practice Guidance.
- 3.4 The Standard Method does not reflect affordable housing need; nor is it an appropriate basis with which to monitor affordable housing supply.

Housing Register

- 3.5 The Council's Freedom of Information ("FOI") response confirms that on 8 August 2024, when the response was received, there were 1,026 households on the Housing Register.
- 3.6 The Council's FOI response specifies that 285 households specified a preference for an affordable home in Martley Parish as of 31 March 2024.

Temporary Accommodation

- 3.7 The Council's FOI response details that 2 households were housed in temporary accommodation within the Malvern Hills District area on 31 March 2024 and a further 13 households were housed in temporary accommodation outside the District.
- 3.8 MHCLG data indicates that Malvern Hills spent £102,000 on Bed and Breakfast hotels (including shared annexes) for use as temporary accommodation, in the 2022 – 2023 monitoring period.

Homelessness

- 3.9 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 83 households in need of homelessness prevention duty¹, and a further 156 households in need of relief duty² from the Council.

4.0 Gross Additions to Affordable Housing Stock

- 4.1 Figure 1 illustrates the delivery of affordable housing ("AH") in the Malvern Hills area over the 17-year period since the start of the SWDP (2016) period in 2006/07.

*** Continues Overleaf ***

¹ 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.

² 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.

Figure 1: Additions to Affordable Housing Stock (Gross), 2006/07 to 2022/23

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2006/07	183	39	21%
2007/08	299	23	8%
2008/09	256	100	39%
2009/10	222	51	23%
2010/11	137	74	54%
2011/12	229	115	50%
2012/13	176	8	5%
2013/14	184	53	29%
2014/15	258	95	37%
2015/16	323	117	36%
2016/17	363	90	25%
2017/18	467	188	40%
2018/19	591	180	30%
2019/20	417	152	36%
2020/21	528	254	48%
2021/22	448	175	39%
2022/23	462	153	33%
Totals	5,543	1,867	34%
Avg. Pa.	326	110	

Source: FOI Response August 2024

4.2 Between 2006/07 and 2022/23, a total of 5,543 dwellings were delivered in Malvern Hills, equivalent to 326 per annum. Of these, 1,867 dwellings were affordable tenures, equivalent to 110 per annum. This equates to 34% gross affordable housing delivery.

5.0 Additions to Affordable Housing Stock Net of Right to Buy Losses

5.1 Figure 2 below sets out net affordable housing delivery in Malvern Hills for the period 2006/07 and 2022/23 once recorded Right to Buy sales and acquisitions are accounted for.

Figure 2: Additions to Affordable Housing Stock (Net of Right to Buy), 2006/07 to 2022/23

Monitoring Year	Total housing completions (Net)	Additions to AH Stock (Gross)	RP RtB Sales	Additions to AH Stock (Net of RtB)	Net additions as a %age of total completions
	A	B	C	D (B – C)	E (E / A) X 100
2006/07	183	39	n/a	39	21%
2007/08	299	23	n/a	23	8%
2008/09	256	100	n/a	100	39%
2009/10	222	51	n/a	51	7%
2010/11	137	74	n/a	74	54%
2011/12	229	115	8	107	47%
2012/13	176	8	4	4	2%
2013/14	184	53	6	47	26%
2014/15	258	95	5	90	35%
2015/16	323	117	5	112	35%
2016/17	363	90	5	85	23%
2017/18	467	188	7	181	39%
2018/19	591	180	2	178	30%
2019/20	417	152	19	133	32%
2020/21	528	254	3	251	48%
2021/22	448	175	4	171	38%
2022/23	462	153	6	147	32%
Totals	5,543	1,867	74	1,793	32%
Avg. Pa.	326	110	6	105	

Source: FOI Response (August 2024); MHCLG Open Data

6.0 Affordable Housing Delivery Compared to Objectively Assessed Needs

6.1 Figure 3 below compares net of Right to Buy affordable housing delivery in Malvern Hills and the needs identified in the 2012 SHMA, between the periods 2012/13 and 2016/17, as set out in the SHMA.

Figure 3: Additions to Affordable Housing Stock (Net of Right to Buy) Compared to Affordable Needs Identified in the 2012 SHMA, 2012/13 to 2016/17

Monitoring Year	Additions to AH Stock (Net of RtB)	2012 SHMA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2012/13	4	131	-127	-127	3%
2013/14	47	131	-84	-211	36%
2014/15	90	131	-41	-252	69%
2015/16	112	131	-19	-271	85%
2016/17	85	131	-46	-317	65%
Total	338	655	-317		52%
Avg. Pa	68	131	-63		

Source: FOI Response (August 2024), 2012 SHMA

6.2 Figure 4 below compares net of Right to Buy affordable housing delivery in Malvern Hills and the needs identified in the 2021 SHMA Update since its 2021/22 base date:

Figure 4: Additions to Affordable Housing Stock (Net of Right to Buy) Compared to Affordable Needs Identified in the 2021 SHMA Update, 2021/22 and 2023/23

Monitoring Year	Additions to AH Stock (Net of RtB)	2021 SHMA Update AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	171	331	-160	-160	52%
2022/23	147	331	-184	-344	44%
Total	318	662	-344		48%
Avg. Pa	159	331	-172		

Source: FOI response (August 2024), 2021 SHMA Update

7.0 Affordability Indicators

7.1 The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Malvern Hills for any household seeking an affordable home:

Private Rental Market – VOA³/ONS⁴ open data

- Median private rents in Malvern Hills stood at £755 per calendar month (“pcm”) in 2022/23. This represents a 24% increase from 2013/14 (first publication) where median private rents stood at £610 pcm.
- The average lower quartile monthly rent in Malvern Hills in 2022/23 was £650 pcm. This represents a 30% increase from 2013/14 where average lower quartile monthly rents stood at £500 pcm.

Median House Prices – ONS open data

- The ratio of median house prices to median incomes across Malvern Hills now stands at 9.91, a 2% increase since the start of the SWDP period in 2006 where it stood at 9.69.
- The median house price across Malvern Hills has risen by 67% since the start of the SWDP period; from £195,000 in 2006 to £325,000 in 2023.

Lower Quartile House Prices – ONS open data

- The ratio of lower quartile house price to incomes across Malvern Hills in 2023 stood at 9.21.
- The lower quartile house price across Malvern Hills has risen by 63% since the start of the SWDP period; from £150,000 in 2006 to £245,000 in 2023.

8.0 Matters in Agreement

- 8.1 It is agreed that Policy SWDP 15 is drafted to capture a benefit and is not needed in mitigation or to ward off a harm.
- 8.2 It is agreed there is an acute national housing crisis.
- 8.3 It is agreed that there is an on-going and pressing need for affordable housing in Malvern Hills District Council.
- 8.4 It is agreed that the benefit of affordable homes is a material consideration weighing in favour of the development.

³ Valuation Office Agency

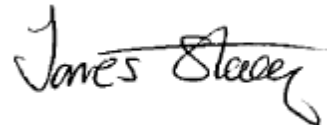
⁴ Office for National Statistics

8.5 The parties agree that very significant weight should be afforded to the benefit of 22 affordable homes.

Signed on behalf of the LPA:

Signed on behalf of the Appellant:

Lee Walton



Signature:

Signature:

Name:

Name: James Stacey

Date: 4th November

Date: 4 November 2024