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NORTH WARWICKSHIRE
BOROUGH COUNCIL

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**PLANNING & DEVELOPMENT
DIVISION**

AFFORDABLE HOUSING STATEMENT

LAND NORTH OF ORTON ROAD, WARTON

March 2025

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1. INTRODUCTION

- 1.1 This Affordable Housing Statement has been prepared on behalf of Richborough, Michael Caton and Andrew Caton ('the applicants') and supports an outline planning application for residential development on land north of Orton Road, Warton, North Warwickshire ('the application site').

- 1.2 The description of development ('the proposed development') being applied for is:

"Outline planning application for the construction of up to 110 dwellings, with access, landscaping, sustainable drainage features, and associated infrastructure. All matters are reserved except for primary vehicular access from Church Road."

- 1.3 This Affordable Housing Statement has been prepared in support of this application and sets out the provision of affordable housing as part of the proposed development in the context of both the national policy framework and local planning policy. The Statement is structured as follows:

Chapter 2 – sets out the national policy context for the delivery of affordable homes.

Chapter 3 – sets out the local policy context for the delivery of affordable homes in North Warwickshire.

Chapter 4 – sets out the proposals subject to this outline planning application at Warton, including details on affordable housing provision and how such provision accords with the requirements of the development plan.

Chapter 5 – concludes the Statement and notes that substantial weight should be attached to the delivery of affordable housing which is in accordance with national policy and the development plan.

- 1.4 This Affordable Housing Statement should be read alongside the Planning Statement, Design & Access Statement and Illustrative Framework Plan which provide greater detail on the overall proposals and policy requirements.

2. NATIONAL PLANNING POLICY CONTEXT

The National Planning Policy Framework

- 2.1 The National Planning Policy Framework 2024 ("the Framework") is a material consideration in the determination of planning applications.
- 2.2 Achieving sustainable development sites at the heart of the Framework. There are three overarching objectives to sustainable development: economic, social and environmental. With regards to the social role the Framework requires the planning system 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; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- 2.3 Paragraph 11 of the Framework is clear that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:
- *Approving development proposals that accord with an up-to-date development plan without delay; or*
 - *Where there are no relevant development plan policies, or the policies which are the most important for determining the application are out-of-date, granting permission unless:*
 - *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*
- 2.4 The Government's imperative to deliver a sufficient supply of homes is set out in Chapter 5 of the Framework. Paragraph 61 states 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 and that land with permission is developed without unnecessary delay. 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.

- 2.5 Paragraph 62 sets out the policy considerations to determine the minimum number of homes in an area. Paragraph 63 adds that when assessing the number homes required, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing (including social rent), families with children, looked after children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- 2.6 The Framework at paragraph 64 sets out that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:
- a) Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
 - b) The agreed approach contributes to the objective of creating mixed and balanced communities.*
- 2.7 Paragraph 66 states that where major 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.
- 2.8 The definition of affordable housing is set out in Annex 2 of the Framework. It defines affordable housing as 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: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build*

to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

- b) Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*
- c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.*
- d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement. or the relevant authority specified in the funding agreement.*

3. LOCAL PLANNING POLICY CONTEXT

North Warwickshire Local Plan (2021)

- 3.1 The Local Plan establishes the following policies in respect of housing:
- 3.2 Policy LP7 (Housing Development) expects sites to provide for a range of needs and opportunities including homes for those with mobility issues, older people; younger people; and plots for custom/ self-builders. It expands that development proposals should make serviced plots available for self-build to address relevant demand identified in the Council's Self and Custom Build register at the time of the planning application, unless that would be unfeasible on account of the nature of the development proposed, its scale, or viability. Special needs housing will be sought on all major development. The amount of special needs housing sought will be expected to amount to 10% of the total housing provision on the site. Housing is expected to be built at a net density of no less than 30 dwelling per hectare.
- 3.3 No prescriptive housing mix is identified.
- 3.4 Policy LP9 (Affordable Housing Provision) requires all major development on greenfield sites to provide 40% of housing as affordable. On sites of over 100 dwellings consideration will be given to land being gifted to the Borough Council in lieu of the total affordable housing provision. Affordable housing should include a tenure to be approximately 85% affordable rent and 15% intermediate tenure will be provided where practicable and unless evidence justifies departure from this.

Affordable Housing SPD (2008)

- 3.5 The Council's Affordable Housing SPD sets out the following guidance:

Size & Mix

- 3.6 The size and mix of affordable homes in terms of the number of bedrooms and flats/family houses should reflect the local need, unless physical or locational site constraints preclude this from being applied. The most up-to-date information on local need can be found in the latest Housing Needs Surveys and in the Council's Housing Register.
- 3.7 Affordable homes should be at least as large as market homes on the site with the same number of bedrooms. Minimum floor space requirements noted for RSL properties should apply to affordable homes in all circumstances, regardless of

method of delivery and management. In both rural and urban settlements conversions as well as new build can also make a valuable contribution to affordable housing.

- 3.8 To minimise any potential for creating enclaves or ghettos of “Social Housing” to which stigma may be applied developments should include an overall mix of dwelling sizes and types, reflecting the need and ‘pepperpotted’ throughout the estate development, where appropriate, rather than concentrated in a single location. This can be via individual units or cluster groups throughout an estate.

Standards & Design

- 3.9 Design standards for affordable housing should be no lower than for market housing and the affordable housing should not be distinguishable by its external appearance.

Timing of Provision

- 3.10 Affordable housing should generally be provided at the same time as open market housing on a site. On large developments, where the cost of providing infrastructure may be substantial, the Council may permit the sale of a certain percentage of market properties before the sale or transfer of affordable housing with the remainder being sold or transferred in tranches/batches with the market housing. This will be negotiated on a site-by-site basis but will normally be in the region of 30% of open market properties for sites at or over 25 units. However, no development should take place until the affordable housing scheme has been approved

Occupancy

- 3.11 Affordable housing should always be offered in accordance with the Council’s nominations policy, detailed in the Councils Allocation Policy, which prioritises households who are living in unsuitable or insecure accommodation, and newly forming households who have a local connection with North Warwickshire and who cannot afford to buy or rent housing of a suitable size on the open market in the Borough. The Council will wish to be satisfied that the occupancy criteria will be met and will require a Nominations Agreement to be in place with the RSL or affordable housing provider prior to commencement on site, providing the Council with 100% nomination rights for tenants at the initial letting stage and 75% nomination rights for subsequent re-lets. The Councils Allocation Policy will also apply to intermediate, shared ownership housing, where those on the

Register and in identified housing need have indicated a preference for purchase over rental.

Eligibility

- 3.12 In order that the housing caters for local needs the Borough Council will adopt a cascade approach. As such, affordable housing should initially go to those who live or work in the Parish or Ward where the housing development is taking place. Once demand is met from within the Ward those living in adjacent Parishes and Wards will be considered. Any remaining units will be offered to anyone living or working within North Warwickshire Borough who is in housing need, which can include those who have been offered a job in North Warwickshire and need to move into the area but cannot afford a house. As such they will need to provide proof of the job offer. Finally, if there are no eligible individuals from within the Borough the affordable units can be made available to adjoining local authority wards and subsequently the wider region.

Tenure

- 3.13 Affordable housing can be rented, owned with a discount in perpetuity or shared ownership/equity (New Build Homebuy) but in all cases will require a significant subsidy to make it affordable. The Housing Needs Survey demonstrates that the majority of households in need of affordable housing will only be able to afford to rent. The priority will therefore be the provision of rented housing through involvement of a RSL. However, subject to there being an identified need, private rented (maintained and managed as affordable in perpetuity) shared ownership and discount market housing will all be acceptable where the monthly/weekly cost is comparable to RSL levels in similar properties.

Method of Delivery/Provision

- 3.14 The Borough Council will expect to secure affordable housing provision on site where open market housing is proposed in order to ensure mixed sustainable communities. National Planning Policy and Guidance notes that there is greater scope for securing affordable housing through off site-provision, developer contributions or "planning obligations". However, the Adopted Local Plan Policy does not specifically provide for alternatives due to the lack of alternative sites and the need to ensure mixed communities. Only in exceptional circumstances will the Borough Council accept that provision can be made on another site or through an alternative method.

Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) November 2022

- 3.15 The 2022 Coventry & Warwickshire HEDNA represents the latest published evidence in respect of housing needs within North Warwickshire.
- 3.16 The HEDNA estimates the need for social/affordable rented housing (per annum) in North Warwickshire. This identifies a net need for 60 social/affordable rented properties per annum (Table 8.15).
- 3.17 The HEDNA estimates a total gross need of 120 affordable home ownership dwellings per annum (Table 8.25). Having required to supply it is forecast the net need is just 2 dwellings per year.
- 3.18 Part D of the HEDNA considers the appropriate mix of housing, with a particular focus on the sizes of homes required in different tenure groups for new development.
- 3.19 The adjusted modelled mix of housing by size and tenure for North Warwickshire is as follows (Table 12.13):

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	41%	43%	6%
Affordable home ownership	23%	36%	34%	7%
Affordable housing (rented)	34%	36%	26%	4%

Source: Housing Market Model (with adjustments)

- 3.20 The HEDNA concludes that further analysis, linked to demographic change concludes that the following represents an appropriate mix of affordable and market homes for new development, taking account of household change and ageing of the population (Table 12.23):

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	40%	40%	10%
Affordable home ownership	20%	45%	25%	10%
Affordable housing (rented)	35%	35%	20%	10%

Source: Derived from Housing Market Model

- 3.21 The HEDNA recognises the limited flexibility which 1 bed properties offer to changing household circumstances, which feed through into higher turnover and management issues.

Housing Register

3.22 Through pre-application discussions the following need was identified on the Borough Council's waiting list:

- 18 x 1 bed flats
- 1 x 2 bed flat
- 3 x 2 bed bungalow
- 31 x 2 bed houses
- 11 x 3 bed houses
- 10 x 4 bed houses

3.23 Of those on the waiting list, the majority live within North Warwickshire Borough, including Warton. It is also noted that this data does not include those who may aspire to affordable home ownership including shared ownership or First Homes.

North Warwickshire Annual Monitoring Report 2023/24

3.24 The Council's latest Annual Monitoring Report (AMR) has a base date of 31st March 2024 and reviews plan-making progress and assess the implementation of adopted planning policies.

3.25 Regarding affordable housing the AMR states that affordable housing completions in 2023/24 was just 17 dwellings, equating to around 6% of total housing completions achieved in this period. Table 3 of the AMR sets out affordable housing completions over the last 5 years and is replicated below:

Year	Total Affordable Completions
2019/20	28
2020/21	93
2021/22	76
2022/23	32
2023/24	17

3.26 The delivery is demonstrated to be lower, on average, than the identified annual affordable housing need.

4. THE PROPOSED DEVELOPMENT

- 4.1 This planning application relates to the development of up to 110 dwellings on land to the north of Orton Road, Warton. The proposal is outline in nature, with all matters reserved, saved for access.
- 4.2 The proposal includes the provision of 40% affordable housing on site in line with current Local Plan requirements, to be secured through a S106 Agreement.
- 4.3 Richborough would support the inclusion of Local Occupancy Criteria within the S106 Agreement to ensure those with a connection to Warton are prioritised. This would reflect the cascade approach set out in the Affordable Housing SPD.

Affordable Housing Mix

- 4.4 The draft Heads of Terms, contained within the submitted Planning Statement, states that affordable housing would be secured with the following tenure split:
- 85% affordable/social rented
 - 15% intermediate
- 4.5 If the Council wishes to secure the affordable housing mix at the outline application stage, the following is proposed.

Table 4.1: Proposed Affordable Mix

Type	Aff/Social Rent	Intermediate
1 Bed	20%	0%
2 Bed	50%	65%
3 Bed	25%	35%
4 Bed	5%	0%
TOTAL	100%	100%

- 4.6 The identified affordable housing mix has regard to the latest housing needs evidence set out in the 2022 HEDNA and the needs identified on the Council's current affordable housing waiting list.
- 4.7 In line with evidence, 50% of the affordable/social rented units are proposed as two bed units. Two bed units represent the greatest need as set out in the HEDNA and the current housing waiting list.
- 4.8 A slight reduction against the HEDNA evidence is proposed in the level of one bed affordable/social rented units, reflecting the limited flexibility which 1 bed

properties offer to changing household circumstances, which feed through into higher turnover and management issues for Registered Providers.

- 4.9 On this basis it is considered that the proposed affordable housing mix would accord with the requirements of LP7 and LP9 and the approach

Layout and Integration

- 4.10 The layout and integration of affordable housing within the site will be determined through a subsequent reserved matters application, however there is no reason why provision could not be provided in small clusters and designed to be tenure blind to accord with guidance set out in the Affordable Housing SPD.

Weighing in the Balance

- 4.11 The provision of affordable housing is commonly seen as planning benefit that attracts weight in the planning balance when a decision-maker is considering residential development proposals that include the provision of affordable housing. There are a significant number of recent decisions issued both by Local Planning Authorities, the Secretary of State and various planning Inspectors, which have placed significant weight upon the delivery of affordable housing in the planning balance.
- 4.12 The social benefit of affordable housing is also clear and recognised in terms of supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations, creating inclusive and mixed communities and also supporting social well-being. The social dimension is one of the three dimensions in achieving sustainable development as set out in the NPPF.
- 4.13 Affordable housing needs exist now with real people. It is therefore imperative that all is done to ensure that these needs are met, which includes giving significant weight to the provision of affordable housing from larger residential schemes, particularly in smaller settlements in increasingly unaffordable areas.
- 4.14 The application proposals offer the opportunity for up to 44 new affordable homes to be built contributing towards meeting the affordable housing need for North Warwickshire and therefore substantial weight should be attached to the provision of affordable homes in the planning balance when determining this application.

5. CONCLUSIONS

- 5.1 This Affordable Housing Statement has been prepared on behalf of Richborough, Michael Caton and Andrew Caton and supports a outline planning application for residential development of up to 110 dwellings at land north of Orton Road, Warton
- 5.2 It has been consistently recognised by various UK Government's that there is a dire shortage of homes and affordable homes across England and Wales, with more and more people unable to afford market rate housing, with the Government seeking the delivery of more Council and housing association homes.
- 5.3 The NPPF seeks 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; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- 5.4 With regards to the social aspects of affordable housing, the benefits towards social well-being that affordable housing offers should be a material planning consideration which should be afforded substantial weight in the planning balance and decision-taking process
- 5.5 Upon consideration of the latest evidence there is a growing need for affordable housing both nationally and in North Warwickshire. There has been an under provision of affordable housing completions in the last five years across the Borough.
- 5.6 It has been demonstrated that the provision of up to 44 affordable homes as part of this proposed development accords with the policy requirements as set out in the adopted Local Plan.
- 5.7 The proposed development will provide a suitable mix and variety of dwelling sizes with the provision of affordable housing attracting substantial weight in the determination of the application.

