Tetlow King
PLANNING

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

Land West of Tattenhall Road, Tattenhall

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

Outline planning application for the erection of up to 110 residential dwellings (including affordable housing), introduction of structural planting and landscaping, public open space, sustainable urban drainage system and associated works (all matters reserved except for access)

Land West of Tattenhall Road, Tattenhall

Gladman Developments Ltd

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Contents

	Executive Summary	
Section 1	Introduction	1
Section 2	Affordable Housing as an Important Material Consideration	4
Section 3	The Development Plan and Related Policies	9
Section 4	Affordable Housing Needs	16
Section 5	Affordable Housing Delivery	22
Section 6	Other Relevant Evidence - Affordability Indicators and Future Supply	31
Section 7	Council and Rule 6 Assessment of the Proposals	45
Section 8	Benefits of and Weight to be Attributed to the Proposed Affordable Housing at the Appeal Site	48

Appendices

Appendix JS1	FOI Request Correspondence submitted on 16 October 2026
Appendix JS2	Relevant PPG Extracts
Appendix JS3	West Cheshire Homes Webpage Extract – Housing Register Data

Core Documents

CD6.11	Relevant Extracts from the CWaC Local Plan (Part One) Strategic Policies Plan 2015
CD7.06	CWaC Borough Plan 2024 – 2028
CD7.07	CWaC Housing Strategy 2025 - 2035
CD7.08	CWaC Homelessness and Rough Sleeping Strategy 2025 – 2030
CD7.09	CWaC Strategic Housing Market Assessment (July 2013)
CD7.10	CWaC Housing Needs Assessment (February 2026)
CD6.01	Tattenhall & District Parish Housing Needs Report (2023)
CD6.03	CWaC Housing Land Monitor Summary Report 2026
CD1.05	Gladman's Planning and Affordable Housing Statement
CD7.01	Government Housing White Paper 'Fixing our Broken Housing Market' (February 2017)
CD7.02	Written Ministerial Statement 'Building the Homes We Need' (July 2024)
CD7.03	Written Ministerial Statement 'Building the Homes We Need' (December 2024)
CD7.04	Written Ministerial Statement 'Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing' (February 2025)
CD7.05	Letter to Chief Executive of the Planning Inspectorate 'The New National Planning Policy Framework: Creating a Clear, Rules-Based Planning System' (October 2026)
CD6.12	Local Plan (Part Two) Land Allocations and Detailed Policies (2019)
CD6.10	Tattenhall and District Neighbourhood Plan (2014)
CD6.05	Draft Tattenhall and District Revised Neighbourhood Plan (2026)
CD8.06	Tattenhall District Modified Neighbourhood Plan Examiner Report Final 22102026

CD7.12	CWaC Response to Tattenhall District Modified Neighbourhood Plan (July 2026)
CD8.02	Appeal Decision 3192918: Former North Worcestershire Golf Club Ltd, Hanging Land, Birmingham (July 2019)
CD6.02	New Economics Foundation 'Reforming Right to Buy: Options for Preserving and Delivering New Council Homes for the Twenty-First Century' (2024)
CD6.04	MHCLG 'A National Plan to End Homelessness' (2025)
CD8.07	Appeal Decision 3324631: Land at Sondes Place Farm, Westcott Road, Dorking (28 November 2023)
CD8.01	Appeal Decision 3165228: Land at the Corner of Oving Road, Chichester (18 August 2017)
CD8.08	Appeal Decision 3230827: Oxford Brookes University Campus at Wheatley (23 April 2020)
CD7.11	Children's Commissioner 'Bleak Houses: Tackling the Crisis of Family Homelessness in England' (2019)
CD8.06	Appeal Decision 3278256: Land at Filands Road/Jenner Lane, Malmesbury (5 January 2022)
CD3.06	CWaC Housing Policy Officer Consultee Response (July 2025)
CD8.05	Appeal Decision 3136237 & 3136233: Land to the west of Langton Road, Norton (22 July 2016)
CD8.04	Appeal Ref 6005671: 'Land South of Green Road, Wivelsfield Green' (6 October 2026)
CD8.03	Appeal 60082308: 'Land North of A507, West of A10, Buntingford' (24 September 2026)
CD8.09	Appeal 6005664: 'Land West of Spratts Farm, Queenborough Road, Southminster, Essex (August 2026)

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 Cheshire West and Chester (CWaC) area.

ii. Outline planning permission is sought for up to 110 dwellings, of which 30% are proposed as affordable homes equivalent to up to 33 affordable homes. This level of provision meets the requirements of Policy SOC1 (30%) of the Local Plan (Part One) Strategic Policies Plan 2015 **(CD6.11).**

iii. The tenure split will be determined at the Reserved Matters stage, to reflect local needs at that time.

iv. The affordable housing provision 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 CWaC. These include:

- Borough Plan 2024 - 2028 **(CD7.06);**
- Housing Strategy 2025 – 2035 **(CD7.07)**; and
- Homelessness and Rough Sleeping Strategy 2025 - 2030 **(CD7.08)**.

Affordable Housing Needs

vi. Since the preparation of the Local Plans (Part One and Part Two), there have been two assessments of affordable housing need in CWaC:

Summary of Annual Average Affordable Housing Needs based on the Council's published Housing Needs Assessments 2013 - 2026 (Figure 4.1 in the Proof)

Report	Monitoring Period	Annual Average Affordable Housing Needs
2013 SHMA **(CD 7.09)**	2013/14 - 2017/18	714
2026 HNA **(CD7.10)**	2025-2045	1,694

Source: Published CWaC Housing Needs Assessments

vii. Although there has been no needs assessment prepared for the years 2018 – 2024, it is worth noting that since the production of the 2013 SHMA, the affordable housing needs for CWaC have more than doubled.

viii. In addition, in 2023 the Tattenhall & District Parish Housing Needs Report **(CD6.01)** identifies a shortfall of 12 affordable homes in the Parish. This is based on an affordable housing need for 29 affordable / social rent homes (derived from the Housing Register December 2023) minus an estimated supply of 17 affordable housing from pipeline developments with planning permission and re-lets of existing stock. Consideration of this level of need appears to have been superseded by housing allocations in the emerging Neighbourhood Plan, which as Mr Mark Johnson states the housing numbers for Tattenhall are not a maximum.

ix. It is also worth noting, that the above is based on a narrow snap-shot in time and focuses only on those households on the Housing Register based in Tattenhall as of December 2022. Therefore, ignoring the households in affordable housing need who might have a local connection to Tattenhall but be based outside of Tattenhall or indeed have a preference for an affordable home in Tattenhall.

x. Furthermore, it doesn't account for any households in need of other forms of affordable housing (as per NPPF Annex B) such as affordable home ownership properties. Overall, it is an under-representations of actual affordable housing need in Tattenhall. In addition, the proposed affordable housing will also meet a District wide need.

Affordable Housing Delivery

xi. Against the identified affordable housing in the 2013 SHMA over the period 2013/14 to 2017/18, a substantial cumulative shortfall has emerged, amounting to -1,520 affordable homes over the five-year period; equating to an average annual shortfall of -304 dwellings.

xii. As affordable housing delivery data for 2025/26 is not yet available, it is not possible to assess delivery performance against the identified need in the 2026 HNA. That said, the average net delivery of affordable housing since 2018/19 has been 394 affordable dwellings per annum; therefore, a four-fold uplift in delivery would be required if the 2026 HNA identified need is to be met.

Other Relevant Evidence - Affordability Indicators and Future Supply

xiii. The other relevant evidence presented in the form of the following affordability indicators are important material considerations and in this particular case

demonstrate a worsening situation in CWaC for any household seeking an affordable home:

Housing Register

- West Cheshire Homes **(Appendix JS3)** reports that there are 6,351 applicants on the Housing Register. This represents a 7% increase from the MHCLG reported position as of 31 March 2025 of 5,931 households on the Housing Register.

Housing Register Bids and Lettings

- The CWaC Housing Strategy **(CD7.07)** explains that social housing in CWaC is advertised and allocated via a Choice Based Lettings (CBL) system known as West Cheshire Homes. It goes on to set out that during 2023/24, there were 1,318 properties advertised through CBL and over 38,463 bids received but only 1,043 social housing properties were let during that 12 months (page 10). The sheer number of bids demonstrates the scale of the acute need for more affordable homes in CWaC.

Temporary Accommodation

- MHCLG statutory homelessness data highlights that on 31 March 2025, there were 74 households housed in temporary accommodation by the Authority, with 24% of these being households with children.

- MHCLG data indicates that CWaC spent £3,346,000 on temporary accommodation between 1 April 2024 and 31 March 2025; with over £2.9m of this being on Bed and Breakfast Hotels.

Homelessness

- MHCLG statutory homelessness data shows that in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 924 households in need of homelessness prevention duty[1], and 830 households in need of relief duty[2] from the Council.

[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 homelessness. 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.

Private Rental Market

- ONS data shows that average (mean) private rents in CWaC stood at £959 per calendar month ("pcm") in 2025/26. This represents a 6% increase in a single year from 2024/25 where average private rents stood at £907 pcm.

Median House Prices

- The ratio of median house prices to median incomes in CWaC now stands at **6.93**. This is above the regional average for the North West by 15%. In addition, the affordability ratio for the North West has been improving (decreasing) since 2021, however, in CWaC the ratio has started to increase again between 2024 and 2025.
- The median house price across CWaC 046 'Dodleston, Tattenhall and Duddon' MSOA has risen by 53% from £275,000 in 2010 to £419,995 in 2025. The 2025 house price figure for the MSOA is 48% higher than the CWaC figure of £258,000 and 62% higher than the North West figure of £220,000.

Lower Quartile House Prices

- For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in CWaC in 2025 stood at **6.58**.
- The lower quartile house price across CWaC 046 'Dodleston, Tattenhall and Duddon' MSOA has risen by 52% from £205,000 in 2010 to £311,748 in 2025. This figure is 56% higher than the CWaC figure of £175,000 and 67% higher than the North West figure of £154,950.

The Future Supply of Affordable Housing

xiv. If all 3,269 dwellings included in the 2026 HLM forward supply (**CD6.03**) come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (i.e. 30%) as a proportion of overall housing completions, this is likely to deliver only 981 affordable dwellings over the period, equating to just 196 new affordable dwellings per annum. However, this represents an over-estimation of the likely future supply as not all sites will be of a sufficient size to trigger the requirement to deliver affordable housing.

xv. Furthermore, if one were to assume that the past gross affordable housing provision over the last 15 years of 32% (Figure 5.1) is to be continued over the next five years,

this is likely to deliver only 1,046 affordable dwellings over the period, equating to just 209 new affordable dwellings per annum.

xvi. Notwithstanding the above, even taking into account the over-estimation of likely future supply of affordable housing and assuming a gross delivery of affordable housing above policy compliant requirements, the future rate of delivery is substantially below the 1,694 per annum 2026 HNA need figure. Therefore, it is unlikely that the Council will be able to meet its affordable housing needs over the next five years.

xvii. In addition, the fact that CWaC cannot demonstrate the required five year supply of housing, means it is not just under providing on the delivery of housing, but also on the delivery of affordable housing. In very simple terms, if it was assumed that all 10,135 dwellings (required to achieve a five year supply) were to come forward on eligible sites for affordable and that all would provide policy compliant levels of affordable, this would mean CWaC would deliver 3,041 affordable homes over the next five year, or 608 per annum. This means that there are at least 2,060[3] affordable homes over the next five years not being built; which in an Authority where this is already an acute affordable housing crisis will just seek to exacerbate the issue.

Conclusion

xviii. In light of the key findings of my evidence and the acute need for affordable housing within CWaC, I consider that **substantial weight** should be attributed to the delivery of up to 33 affordable homes through the appeal scheme in the planning balance.

[3] 3,041 – 981 = 2,060

Introduction

Section 1

1.1 This Affordable Housing Proof of Evidence has been prepared by **James Stacey BA (Hons) Dip TP MRTP** of **Tetlow King Planning** on behalf of the Appellant **Gladman Developments Ltd**, in respect of a planning appeal at land to the west of Tattenhall Road, Tattenhall.

1.2 The appeal is made against Cheshire West and Chester (CWaC) Council's failure to determine planning application 25/01764/OUT at the above site which sought planning permission for the following:

> *"Outline planning application for the erection of up to 110 residential dwellings (including affordable housing), introduction of structural planting and landscaping, public open space, sustainable urban drainage system and associated works (all matters reserved except for access)".*

1.3 The proposed development is for up to 110 dwellings, of which 30% (up to 33 dwellings) are to be provided on-site as affordable housing. This level of provision meets the requirements of Policy SOC1 (30%) of the adopted Local Plan (Part One) Strategic Policies Plan (2015) (**CD6.11**).

1.4 The proposed tenure split and bedroom mix will be determined at the Reserved Matters stage, to reflect local needs at that time. The proposed affordable housing will be secured by way of a Section 106 planning obligation.

1.5 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision considering evidence of need in the area. It should be read alongside the Planning Proof of Evidence prepared by Mr Mark Johnson from Johnson Mowat Planning & Development Consultants.

1.6 A Planning and Affordable Housing Statement (June 2025) **(CD1.05),** prepared by Gladman Developments Ltd, formed part of the planning application. As the data for the affordable housing element has by and large moved on since 2025, my Proof of Evidence provides an updated position and reflects the changes since 2025 in both data and planning policy.

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.
- During my career I have presented evidence at more than 180 Section 78 appeal inquiries and hearings. 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 Statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."*

1.9 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 **(CD7.01)**.

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 through a Freedom of Information ("FOI") request submitted to CWaC on 16 October 2026 (**Appendix JS1**). At the time of writing no response had been received, therefore, I reserve the right to provide a short update to my evidence in due course once a response has been received.

1.13 This proof of evidence comprises the following seven sections:

- Section 2 establishes the importance of affordable housing as an important material consideration;
- Section 3 analyses the Development Plan and related policy framework including corporate documents;
- Section 4 sets out the identified affordable housing needs;
- Section 5 examines past affordable housing delivery against identified needs;
- Section 6 covers other relevant evidence including a range of affordability indicators and considers the future supply of affordable housing;
- Section 7 sets out the Council's assessment of the application; and
- Section 8 identifies the benefits of and weight to be attributed to the proposed affordable housing at the appeal site.

Affordable Housing as an Important Material Consideration

Section 2

2.1 In this Section I consider the importance of affordable housing as an important material consideration that should be identified and given weight to, as a separate benefit in the overall planning balance in the determination of this appeal in CWaC.

2.2 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 (August 2026)

2.3 The NPPF was most recently updated on 17 August 2026 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-taking processes.

2.4 The revised NPPF maintains a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 17(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).

2.5 At the heart of the NPPF continues to be the presumption in favour of sustainable development contained at Policy S3. Under Policy S3, for proposals within settlements Policy S4 should be applied; for proposals outside settlements Policy S5 should be applied and *"in all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay".*

2.6 In this instance, Policy S5 'Principle of development outside settlements' is of relevance. Policy S5 provides a list of certain forms of development that should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework. This includes at part j:

> *"Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test)".*

2.7 In addition to the above, development proposals under part j would need to be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.

2.8 Section 6 deals with delivering a sufficient supply of homes and identifies that the objectives of the policies in that Section are to *"support the delivery of a substantial increase in the supply of homes…this includes planning for an appropriate mix of accommodation for the local community".*

2.9 With regards to assessing the need for homes, Policy HO1 notes that Development Plans should take into account an assessment of the size, type and tenure of housing or other accommodation needed for different groups, which includes those who require affordable housing as defined in glossary at Annex B.

2.10 Policy HO5 'Meeting the needs of different groups' requires Development Plans to set out policies to *"address the housing needs of different groups"* and with regards to affordable housing notes this should include *"setting requirements for the type and mix of affordable housing (applying the definition in the glossary at Annex B) required to meet identified local needs" (my emphasis).*

2.11 In terms of meeting the need for homes, Policy HO7 states:

> *"substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence. This includes, but is not limited to, homes needed for different groups assessed under policy HO1"* (my emphasis).

2.12 As set out above, the housing needs of *"different groups assessed under policy HO1"* includes those in need of affordable housing.

2.13 Policy HO8 deals with the provision of affordable homes and establishes that *"development proposals should meet or exceed up-to-date development plan*

requirements for the proportion and mix of affordable housing tenures relevant to the location, including the minimum proportion of Social Rent" (my emphasis).

2.14 Affordable housing is defined within the glossary of the NPPF (Annex B) 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 five categories of affordable housing:

i) Social Rent in accordance with Government's conditions and requirements;

ii) Other Affordable Housing for Rent which is at least 20% below market value;

iii) Discounted Market Sales Housing which is at least 20% below market value;

iv) 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); and

v) Military Affordable Housing where the rent is sub-market military rent as determined by the Ministry of Defence.

Planning Practice Guidance Extracts

2.15 The Planning Practice Guidance ("PPG") was first published online on 6 March 20214 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 JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Written Ministerial Statements (WMS)

***"Building the Homes We Need"* Written Ministerial Statement (30 July 2024) – CD7.02**

2.16 On 30 July 2024, the then-Secretary of State, Angela Rayner MP, delivered a WMS indicating the 'direction of travel' for the new Government's intentions for national planning policy.

2.17 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) – CD7.03**

2.18 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) – CD7.04**

2.19 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."*

Letter to the Chief Executive of the Planning Inspectorate

***"The New National Planning Policy Framework: Creating a Clear, Rules-Based Planning System"* (6 October 2026) CD7.05**

2.20 This letter from the Minister of State, Matthew Pennycook MP, highlights the elements of the new NPPF which *"are intended to support the government's ambitions in respect of boosting housing supply and driving economic growth"*. The letter affirms that *"The new Framework is a material consideration of critical importance"*.

2.21 In the fifth paragraph, Pennycook describes a *"universal tilt in favour of granting planning permission"* as being a *"clear representation of the government's commitment to a planning system that is an enabler of appropriate development and is something which the Framework places at the heart of decision-making".*

2.22 In the sixth paragraph, Pennycook highlights the benefits to which substantial weight should be attached, including housing that meets evidenced needs. Pennycook reaffirms the importance of applying this weight:

> *"The new Framework also emphasises the importance of certain benefits by identifying where substantial weight should be afforded to them. This includes the benefits of providing homes which meet the evidenced needs of communities and the economic benefits of commercial development that allow businesses to invest, adapt and/or expand. Applying this weight appropriately will support our ambitions in respect of housing supply and economic growth."*

Summary and Conclusions

2.23 This Section clearly demonstrates that, within national policy, 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 is 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.

The Development Plan and Related Policies

Section 3

Introduction

3.1 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.

3.2 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises:

i) the CWaC Local Plan (Part One) Strategic Policies (2015) (**CD6.11**),

ii) CWaC Local Plan (Part Two) Land Allocations and Detailed Policies (2019) (**CD6.12**), and

iii) Tattenhall and District Neighbourhood Plan (TDNP) (Made 2014) (**CD6.10**).

3.3 Other material considerations relevant to affordable housing include the NPPF (2026) and the PPG (March 2014, ongoing updates), and a number of corporate documents which support the provision of affordable housing at the corporate level.

3.4 In addition, CWaC has commenced work on a new Local Plan which will replace both the Local Plan Part One and Part Two once adopted. The Tattenhall & District Parish Council has also prepared a Modified Neighbourhood Plan which will cover the period 2025 – 2045. The draft Modified Neighbourhood Plan was submitted for Examination in May 2026, and the Examiners Report was published on 22 October 2026. Further details on the preparation of the Modified Neighbourhood Plan are set out in the Appellant's Planning Proof of Evidence, prepared by Becky Richmond.

The Development Plan

Local Plan (Part One) Strategic Policies Plan (2015) **(CD6.11)**

3.5 The Local Plan (Part One) was adopted in January 2015 and covers a 20-year period from 2010 to 2030. It sets out the strategic policies for the CWaC area.

3.6 On page 11 paragraph 1.8, the Local Plan addresses the area's profile and cites one of its many challenges is with regards to housing affordability compared to incomes:

"In comparison to the wider North West area, Cheshire West and Chester is an area where house prices are high and when considered alongside income levels are relatively unaffordable" (my emphasis added).

3.7 On page 14, it discusses the Council's vision for the area within the Plan period. At paragraph 2.3, one of the main visions is for: *"Residents will have access to a range of high quality market and affordable homes and the needs of all our communities…"*

3.8 Tattenhall is identified as one of the Key Service Centres in the Rural Area of CWaC which provide a good range of facilities and services and will be the focus for new development in the rural area. In accordance with Policy STRAT8, Tattenhall will accommodate at least 250 new dwellings.

3.9 At paragraph 5.3, reference is made to the Strategic Housing Market Assessment ("SHMA") of 2013 which indicated an affordable housing need for 714 dwellings per annum.

3.10 The affordable housing expectations are set out in **Policy SOC 1 (Delivering affordable housing)** which notes the Council will seek 30% affordable housing on qualifying sites as follows:

- In the urban areas on sites that have a capacity for ten or more dwellings or comprise an area of 0.3 hectares or more; and
- In the rural areas on sites that have a capacity of three or more dwellings or comprise an area of 0.1 hectares or more.

3.11 The explanatory text at paragraphs 7.4 and 7.5 make clear that proposals are required to take account of the latest housing needs evidence, and that the Council will also have regard to viability considerations when determining applications:

"*7.4 The policy takes into account the most up to date evidence of need from the Strategic Housing Market Assessment (SHMA). It aims to give certainty to landowners, developers, local communities, and provide guidance for the preparation of neighbourhood plans. The policy will help create balanced and mixed communities and help deliver much needed affordable housing. The policy needs to reflect changing market conditions over time. It is recognised that the quantity of new affordable housing development will often, in practice, be determined as much by the financial viability of new provision as by the level of need. The policy is therefore considered flexible enough to take into account*

the viability of each site and not be so restrictive as to unnecessarily prevent development.

7.5 In seeking to negotiate the maximum level of affordable housing on each site, the Council will have regard to the economic viability of site development, likely costs, market conditions, the availability of public subsidy and the aim of achieving a mixed, balanced and sustainable community. Developers will be expected to demonstrate the validity of such viability factors, providing supporting evidence" (my emphasis).

3.12 The Council go on to acknowledge at paragraph 7.6 that:

"The SHMA shows an annual net shortfall of 714 affordable homes each year across Cheshire West and Chester for the five year period 2013/2014 to 2017/2018. This demonstrates the degree of imbalance between supply and demand for affordable housing, rather than being specific targets for affordable housing…"

3.13 **Policy SOC 3 (Housing Mix)** sets out that in order to support mixed and balanced communities, new residential proposals will need to provide a mix of house types, tenures of both market and affordable housing. However, no specific tenure mix is referenced. At paragraph 7.7, it simply signposts the reader stating that: "*The dwelling type, tenure and size must be reflective of the most up to date SHMA and housing needs information."*

3.14 The Monitoring Framework set out at Appendix H of the Local Plan, notes that based on the housing target to deliver 22,000 net additional dwellings (Policy STRAT 2) and assuming 30% affordable housing is provided, that would give a target of 6,600 affordable homes to be delivered by 2030.

3.15 It is important to note that, in my opinion, this just a target derived from the overall housing target and is not an indication of the actual level of affordable housing across CWaC.

Local Plan (Part Two) Land Allocations and Detailed Policies (2019) (**CD6.12**)

3.16 The Local Plan (Part Two) was adopted by the Council on 18 July 2019 and should be read in conjunction with the Local Plan (Part One). The Plan also covers the period between 2010 and 2030. This Plan sets out the site allocations and detailed development management policies.

3.17 **Policy DM20 (Mix and type of new housing development)** notes that line with Local Plan (Part One) Policy SOC3, proposals for residential development must take account of the housing needs of the local area to ensure a range of house types, tenures and sizes are provided across CWaC. It goes on to set out that the Council will work with developers to agree a suitable housing mix taking full account of the characteristics of the site and viability considerations. Where a Neighbourhood Plan sets out locally specific polices on housing mix and type these will take priority.

3.18 In Tattenhall there is both a Made and an emerging Modified Neighbourhood Plan, therefore, further details on relevant policies on housing mix and type and set out at paragraphs 3.23, 3.28 and 3.29 below.

3.19 The explanatory text at paragraph 12.20 identifies that most up-to-date housing evidence base must be considered in the development of proposals and will need to be agreed with the Council and will allow for a degree of flexibility to achieve a viable mix: *"The Council will work with developers to agree on the most appropriate mix and type and it may not always be possible to provide a range of dwellings across all sites. The most up to date evidence of need at borough and local level should be fully taken into account. The Council recognises that the most appropriate housing mix may not always be achievable and account will be taken of any negative impacts on the viability of a scheme and local design considerations when determining the most suitable mix and type."*

3.20 **Policy DM23 (Delivering Affordable Housing)** sets out that residential development proposals should meet the affordable housing requirements set out in the Local Plan (Part One) Policy SOC1. It also requires the Council to be satisfied that the proposed size and design of any affordable housing, will meet the specific identified need for that type of affordable housing in that area.

3.21 The Monitoring Framework (page 243) sets a target for the delivery of 6,600 affordable homes by 2030 (based upon 30% of housing 22,000 net additional dwellings).

3.22 As part of the Local Plan Part Two Review (June 2024) the Council concluded that no update was required to policies DM20 and DM23 discussed above.

Tattenhall and District Neighbourhood Plan 2010 to 2030 (Made 2014) (CD6.10)

3.23 The TDNP covers the 20 year period 2010 to 2030. With regards to the challenges faced by the local community, affordability of housing is identified: *"affordability remains a key housing issue for Tattenhall and there is a compelling case to meet local*

targets for affordable housing provision, with average house prices too high for those on average incomes resulting in an affordability ratio of seven to one" (page 12).

3.24 There is also an acknowledgement in the TDNP that *"the community recognises that housing development can sometimes bring wider benefits such as…providing much needed affordable homes. Such proposals will be supported in accordance with this policy and the Neighbourhood Plan"* (page 12).

3.25 Policy 1 notes that all housing proposals should provide a mix of homes taking into account objectively identified housing needs and include an element of affordable housing specified in the Local Plan.

Other material considerations

Emerging New Cheshire West & Chester Local Plan

3.26 The Council is preparing a new Local Plan which will cover a 15-year period between December 2028 to December 2043. Once adopted it will replace the existing Local Plan (Part One) Strategic Policies (2015) and Local Plan (Part Two) Land Allocations and Detailed Policies (2019).

3.27 Following the Government's guidance and legislation requiring Local Plans to be prepared, examined and adopted within a 30-month timeline, the Council have recently published a Notice of Commencement and an accompanying Local Plan timetable dated 12 June 2026. This programme sets out that the content and evidence consultation is likely to take place between November 2026 and January 2027. The proposed Local Plan consultation is forecasted for between October 2027 and December 2027. Submission of the Local Plan for Examination is expected for May 2028 and adoption thereafter in December 2028.

3.28 As the Council is still in the early stages of developing its new Local Plan and have not yet published a draft Local Plan for comment, there is presently no emerging policy that is capable of carrying any weight, although the emerging evidence base for the new Local Plan may be a material consideration.

Draft Tattenhall and District Modified Neighbourhood Plan (CD6.05)

3.29 Tattenhall and District Parish Council applied for a Modified Neighbourhood Plan Area in 2023 and have since been preparing a Modified Neighbourhood Plan to cover the period 2025 to 2045 which will contain housing allocations. The Modified Neighbourhood Plan was submitted for Examination in May 2026, with the Examiners Report being published on 22 October 2026 **(CD6.06).**

3.30 Draft Policy 1 notes that housing proposals of 10 or more dwellings should include the provision of onsite affordable housing providing a mix of types, tenures and sizes of homes, taking into account objectively identified housing needs (established through the Tattenhall Housing Needs Report December 2023 or subsequent update). Part Bii of the draft policy requires affordable housing provision to be in accordance with NPPF Policy HO8 and that it will be secured via a S106 Legal Agreement ensuring it remains affordable in perpetuity and also include a short eligibility cascade.

3.31 The Examiners Report (22 October 2026) seeks to amend the draft policy to remove reference to NPPF Policy HO8 and just require affordable housing to be provided in accordance with national guidance. Furthermore, the Inspector has recommended describing the full eligibility criteria for Rented Affordable Housing and Low Cost Ownership in the supporting text but leaving reference to the short eligibility cascade in the policy.

3.32 As explained in the Mr Johnson's Planning Proof of Evidence the weight that is to be afforded to the emerging Modified Neighbourhood Plan at this stage is limited, due to concerns expressed about the Examination process. However, I note that Mr Johnson has also considered the planning balance if the emerging Modified Neighbourhood Plan were to be given significant weight in the planning balance.

Corporate Documents

3.33 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority of CWaC. These include the following documents:

- Borough Plan 2024 - 2028 **(CD7.06)**;
- Housing Strategy 2025 – 2035 **(CD7.07)**; and
- Homelessness and Rough Sleeping Strategy 2025 - 2030 **(CD7.08)**.

3.34 The CWaC Borough Plan 2024 – 20228 notes that one of the six missions of its vision (page 6) is *"Neighbourhood Pride: Residents live in well maintained, connected and safe places with good and affordable homes".*

3.35 One of the three priorities identified in the CWaC Housing strategy is *"affordable homes of all tenures across the Borough"* (page 3). The Strategy goes on to set out that *"working with developers, registered housing providers and communities we want to build homes that meet what we know our borough needs including homes for young people trying to access the housing market…a range of property types and option are*

important including Rent to Buy, shared ownership and discount market sale homes" (page 24).

3.36 Key challenges facing CWaC are identified as including high house prices, with the CWaC Housing Strategy highlighting that in February 2024 CWaC had the fifth-highest average house price in the North West (page 8) alongside an acknowledged lack of the availability of affordable housing in the Homelessness and Rough Sleeping Strategy (page 8).

3.37 Further reference to these corporate documents is made throughout this Proof of Evidence.

Summary and Conclusions

3.38 The relevant Development Plan in respect of affordable housing for CWaC currently comprises the Local Plan (Part One) Strategic Policies Plan 2010 to 2030 (adopted 2015); Local Plan (Part Two) Land Allocations and Detailed Policies (2019) and the Tattenhall and District Neighbourhood Plan (Made 2014). The emerging Modified Tattenhall Neighbourhood Plan has also recently been subject to Examination, with the Inspectors Report being issued on 22 October 2026.

3.39 The evidence set out in this section clearly highlights that within adopted 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 CWaC.

3.40 The appeal proposals provide an affordable housing contribution which meets the requirements of Local Plan (Part One) Policy SOC1 (30%).

3.41 The delivery of up to 33 affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of the Authority, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 5 of my evidence.

Affordable Housing Needs

Section 4

Introduction

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

The Development Plan

4.2 The adopted Development Plan does not define a policy requirement for the provision of affordable homes. Instead, the adopted Local Plan seeks 30% affordable housing provision is made from qualifying developments.

4.3 It does however acknowledge the findings of the 2013 SHMA at paragraph 5.3 of the Local Plan (Part One) which identifies a need for 714 affordable dwellings per annum.

4.4 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 recent assessments of local housing need.

Housing Market Assessments

Cheshire West and Chester Strategic Housing Market Assessment (July 2013) **(CD7.09)**

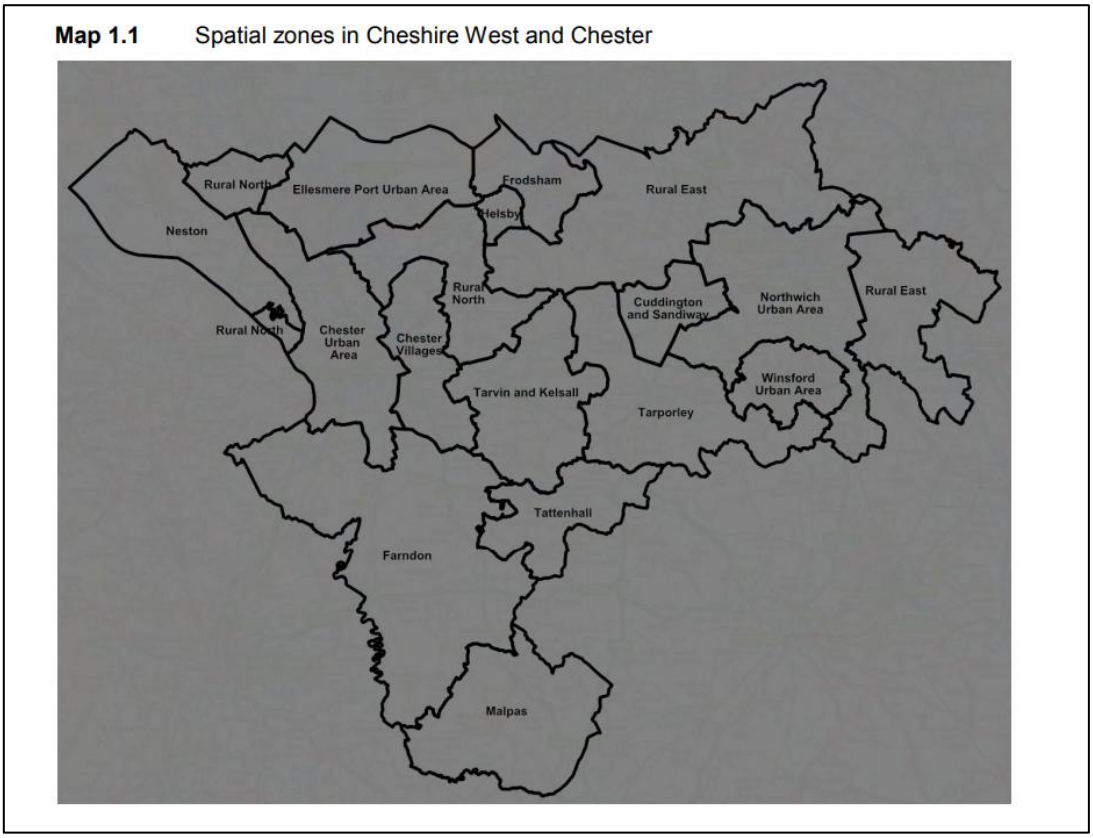
4.5 The CWaC Strategic Housing Market Assessment ("2013 SHMA") prepared by arc4 is the main housing needs evidence base which underpins the housing policies of both the adopted Local Plans, Part One and Two.

4.6 Table D1 on page 111 identifies that there is a net need for **714 affordable dwellings per annum between 2013/14 and 2017/18**, equivalent to 2,856 affordable dwellings over the period.

4.7 Table 4.24 illustrates tenure preferences of existing households in need and newly forming households requiring affordable housing. Overall, analysis would suggest a tenure split of 67.3% affordable rent and 32.7% intermediate tenure based on household preferences.

4.8 Table 4.23 provides a sub-area breakdown of the recommendation for annual affordable housing delivery by property size and designation over the period 2013/14 to 2017/18, which is based on the Map 1.1 taken from page 10 of the 2013 SHMA.

Figure 4.1: Spatial Zones in Cheshire West and Chester



Source: 2013 SHMA, page 10

4.9 For Tattenhall, Table 4.23 recommends the annual delivery of 15 affordable properties, split between 12 one-bed, 2 two-bed and 1 three-bed properties.

Cheshire West & Chester Housing Needs Assessment (February 2026) **(CD7.10)**

4.10 The latest housing needs evidence is the CWaC Housing Needs Assessment ("2026 HNA"). The 2026 HNA covers the 20-year period between 2025 and 2045 and notes at paragraph 1.27:

> *"The evidence indicates that there is an acute need for affordable housing in the Council area and a need in all sub-areas".*

4.11 It goes on to concluded at paragraph 1.38, *"overall, the analysis identifies a notable need for affordable housing, and it is clear that the provision of new affordable housing is an important and pressing issue in the area".*

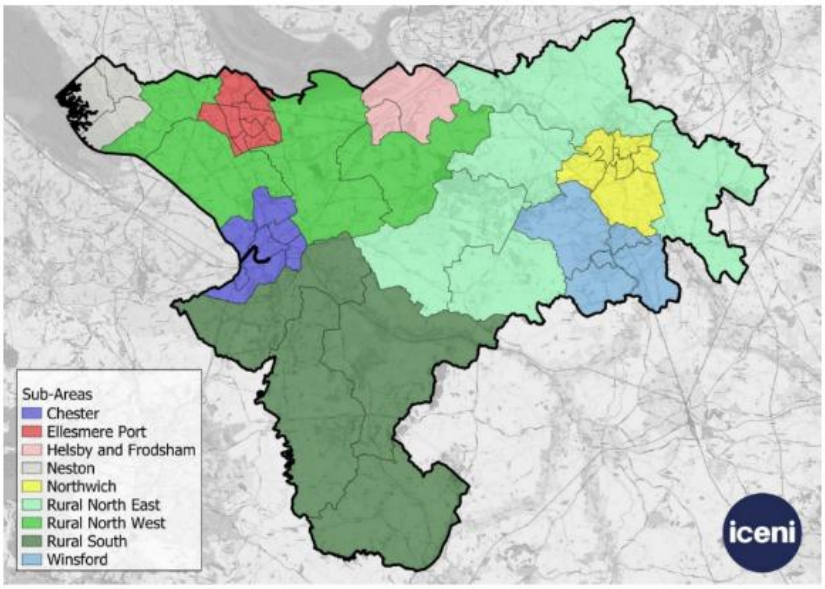
4.12 Paragraph 1.40 acknowledges that: *"It does, however, need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will depend on the amount that can be viably provided."*

4.13 Table 8.15 identifies a net need for affordable housing of 1,694 dwellings per annum across CWaC and also provides a breakdown by sub-area. In terms of the need in the Rural South Area (where the site is located), the net need is 75 affordable homes per annum.

4.14 It is worth noting that the sub-areas used in the 2026 HNA do differ from the sub-areas in the 2013 SHMA. Figure 4.2 below shows the sub-areas used in the 2026 HNA and it's clear that Tattenhall and a number of other settlements are now included together in the Rural South Area.

Figure 4.2: Sub-Areas of CWaC in the 2026 HNA

Figure 3.6 Suggested Sub-Area – Cheshire West and Chester boundary.



Source: Iceni Projects, 2025

Source: 2026 HNA, page 33

4.15 Table 8.16 splits the net need between Unable to buy OR rent and Able to rent but not buy and identifies a net need for 1,529 AH per annum for those unable to buy OR rent and 165 AH per annum for those able to rent but not buy.

4.16 It is important to note that between end of the 2013 SHMA period in 2017/18 and the start of the 2026 HNA in 2025/26, the Council does not have an identified housing

needs assessment which establishes the affordable housing needs in CWaC. Consequently, there is a seven-year period during which identified affordable housing need has not been assessed or accounted for.

Tattenhall & District Parish Housing Needs Report – Final Version (December 2023) (CD6.01)

4.17 Cheshire Community Action (CCA) was commissioned by Tattenhall & District Parish Council to carry out a housing needs assessment of the Parish. The introduction notes that the data will be relevant for up to five years (from June 2023).

4.18 The Executive Summary reports that median house prices are 74% higher than the Borough and lower quartile house prices are 58% higher than CWaC, resulting in a median affordability ratio of 10.5 and a lower quartile affordability ratio of 10.3; which is higher than the CWaC average 6.83.

Figure 4.3: Affordable Housing Shortfall Surplus

	Affordable Housing Need	Estimated Supply		Shortfall (-) / Surplus (+)
Property Type	**Need for Affordable / Social Rent from the Housing Register (Households based in Tattenhall Ward Dec 2022)**	**Estimated Supply of Affordable / Social Rent from Planning Approvals**	**Estimated Supply from Re-lets of Existing Affordable Stock (Annual Average)**	**Housing Register and Survey Needs Minus Estimated Supply**
1 Bed	16	4	4	8
2 Bed	8		5	3
3 Bed	5		4	1
4+Bed				0
Total	**29**	**4**	**13**	**12**

Source: Tattenhall & District Housing Parish Housing Needs Report (2023) – Notes Planning Approval data from CWaC Housing Land Monitor

4.19 Page 3 includes the table above which seeks to estimate the shortfall/surplus of affordable housing in the Tattenhall & District Parish. The affordable housing need is taken from the Housing Register (December 2023) and then deducts the estimated housing supply from pipeline developments with planning permission and re-lets of existing stock to give a shortfall or surplus of affordable housing.

4.20 The table shows an affordable housing need for 29 affordable / social rent homes (based on households based in Tattenhall Ward in December 2022). The estimated supply is shown as 17 affordable dwellings, giving a shortfall of 12 affordable homes.

4.21 It is first of all worth noting, that the identified shortfall of 12 affordable homes in Tattenhall is a snap-shot in time and is based on the number of households based in the Tattenhall Ward as of December 2022. Therefore, it discounts any households on the Housing Register (at that time) who weren't based in the Tattenhall Ward but still have a local connection to Tattenhall, or indeed have a preference for an affordable home in Tattenhall.

4.22 In responding to the consultation on the emerging Tattenhall Modified Neighbourhood Plan (**CD8.06**), the Council's representations (dated July 2026) (**CD7.12**) refer to recommendations made by the Council's Housing Policy Officer which recommend that a specific local connection cascade with timescales is included in emerging policy, noting, *"this would ensure that not only households with a local connection to the Parish are prioritised, but also for areas close to Tattenhall, who depend on Tattenhall as a Key Service Centre to meet their housing needs".* Therefore, demonstrating that the Council already consider delivery of new housing (including affordable housing) in Tattenhall having a wider reach than just meeting the needs of the Parish, which I consider isn't acknowledged in the Housing Needs Assessment.

4.23 Secondly, the needs assessment solely relates to the need for Affordable / Social Rent properties and does not account for any households in need of other forms of affordable housing specified in the NPPF Annex B definition such as affordable home ownership properties. As a result, any shortfall doesn't reflect the full extent of all types of affordable housing in need in Tattenhall, with the needs assessment downplaying the actual level affordable housing need.

4.24 Thirdly, the proposed affordable housing will also contribute to the District wide needs of the Authority.

4.25 Lastly, the emerging Tattenhall Modified Neighborhood Plan seeks to allocate land to accommodate the delivery of up to 600 dwellings (draft Policy 7), which will assist in addressing housing needs at an Authority-wide level. In addition, as the draft policy requires 30% affordable housing to be provided, this will exceed the shortfall of 12 affordable dwellings, therefore, again it is clear that the draft allocation is intended to address needs on a wider scale; which is also what the appeal site is able to do in terms of contributing to meeting the wider evidenced affordable housing across CWaC.

Summary and Conclusions

4.26 Since the preparation of the Local Plans (Part One) and (Part Two), there have been two assessments of affordable housing need in CWaC:

Figure 4.4: Summary of Annual Average Affordable Housing Needs based on the Council's published Housing Needs Assessments 2013 - 2026

Report	Monitoring Period	Annual Average Affordable Housing Needs
2013 SHMA	2011/12 – 2030/31	714
2026 HNA	2025-2045	1,694

Source: Published CWaC Housing Needs Assessments

4.27 The Council has not undertaken an assessment of affordable housing need for the period between 2017/18 and 2025/26. As a result, affordable housing needs have not been formally identified or evidenced for approximately seven years.

4.28 In addition, the Tattenhall & District Parish Housing Needs Report identifies a shortfall of 12 affordable homes in the Parish. However, as set out above, this is based on a narrow snap-shot in time and focuses only on those households on the Housing Register based in Tattenhall as of December 2022. Therefore, ignoring an households in affordable housing need who might have a local connection to Tattenhall but based outside of the Ward or indeed have a preference for an affordable home in Tattenhall.

4.29 Furthermore, it doesn't account for any households in need of other forms of affordable housing (as per NPPF Annex B) such as affordable home ownership properties. Overall, it is an under-representation of actual affordable housing need in Tattenhall and the affordable homes will contribute to the District wide need.

4.30 However, the delivery of up to 33 affordable homes proposed as part of this appeal will contribute towards meeting the evidenced accommodation of the CWaC community.

Affordable Housing Delivery

Section 5

Introduction

5.1 This Section of my evidence analyses the delivery of affordable housing in CWaC. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the Authority.

Past Affordable Housing Delivery

5.2 Figure 5.1 illustrates the delivery of affordable housing ("AH") in CWaC since the start of the Local Plan period in 2010/11.

Figure 5.1: Gross Additions to Affordable Housing Stock, 2010/11 to 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2010/11	752	347	46%
2011/12	713	415	58%
2012/13	583	253	43%
2013/14	880	231	26%
2014/15	1,481	856	58%
2015/16	1,679	277	16%
2016/17	1,930	499	26%
2017/18	2,456	633	26%
2018/19	2,064	734	36%
2019/20	1,759	273	16%
2020/21	1,245	362	29%
2021/22	1,519	426	28%
2022/23	1,355	598	44%
2023/24	1,370	402	29%
2024/25	1,219	502	40%
Totals	**21,005**	**6,808**	**32%**
Avg. Pa.	**1,400**	**454**	

Source: MHCLG Data

5.3 Between 2010/11 and 2024/25, a total of 21,005 dwellings were delivered in CWaC, equivalent to 1,400 per annum. Of these, 6,808 dwellings were affordable tenures, equivalent to 454 per annum. This equates to 32% gross affordable housing delivery.

5.4 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.

5.5 At a national level over two million households have exercised their Right to Buy since it was introduced in 1980. In her Written Ministerial Statement of 30 July 2024, the then Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:

> *"Over the last five years, there has been an average of 9,000 council Right to Buy sales annually, but only 5,000 replacements each year. Right to Buy provides an important route for council tenants to be able to buy their own home. But the discounts have escalated in recent years and councils have been unable to replace the homes they need to move families out of temporary accommodation."*

5.6 Figure 5.2 below calculates the affordable housing delivery per annum since the start of the Local Plan period in 2010/11, net of Right to Buy sales. A net loss of 1,061[4] affordable dwellings over this period equates to 16% of the gross affordable housing completions of 6,808 affordable dwellings over the 15-year period.

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[4] 548 + 513 = 1,061 dwellings

Figure 5.2: Net of Right to Buy Additions to Affordable Housing Stock, 2010/11 to 2024/25

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	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*** ***B - C - D***	***F*** ***(E / A) X 100***
2010/11	752	347	13	n/a	334	44%
2011/12	713	415	3	7	405	57%
2012/13	583	253	15	36	202	35%
2013/14	880	231	44	38	149	17%
2014/15	1,481	856	31	25	800	54%
2015/16	1,679	277	42	45	190	11%
2016/17	1,930	499	40	51	408	21%
2017/18	2,456	633	78	52	503	20%
2018/19	2,064	734	66	57	611	30%
2019/20	1,759	273	48	48	177	10%
2020/21	1,245	362	33	31	298	24%
2021/22	1,519	426	41	32	353	23%
2022/23	1,355	598	43	42	513	38%
2023/24	1,370	402	14	21	367	27%
2024/25	1,219	502	37	28	437	35%
Total	**21,005**	**6,808**	**548**	**513**	**5,747**	**27%**
Avg. Pa.	**1,400**	**454**	**37**	**37**	**383**	**27%**

Source: MHCLG Data and Private Registered Provider Statistical Data Returns

5.7 Figure 5.2 demonstrates that on average between 2010/11 and 2024/25, the Council has added just 383 affordable dwellings per annum net of Right to Buy sales, equivalent to 27% of the total average number of net housing completions. There have been no acquisitions of affordable housing stock by the Council.

5.8 The above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across CWaC faster than the replacements from acquisitions.

5.9 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal at land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019 **(CD8.02)**, where I presented affordable evidence. 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"* (my emphasis).

5.10 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.

5.11 The seriousness of the impact was considered in a report from the New Economics Foundation in May 2024 titled *"Reforming Right to Buy: Options for Preserving and Delivering New Council Homes for the Twenty-First Century"* **(CD6.02)**.

5.12 The report highlights that the Right to Buy scheme has depleted the existing affordable housing stock, explaining that *"Right to Buy has resulted in a net loss of social rent homes every year since its introduction".* Despite Government commitments, *"the one-for-one replacement pledge has never been met";* the report notes that *"for every three homes sold, only one replacement has been started or acquired"*. Clearly, the data shows that homes lost through Right to Buy are not being replaced anywhere near the pace that is needed to counterbalance those sales.

5.13 Furthermore, the report shows that around 4-in-10 homes sold under Right to Buy have not remained in owner occupation, but have instead moved into the private rented sector, often at far higher rents than they would have been in the social rented sector. It cites evidence that *"40.8% of homes sold under right to buy are now let on the private market, compared to 37.66% in 2014/15, a 3.2 percentage point increase* […] *2m*

homes we know have been sold to 2022/23 would mean approximately 824,000 of these sold homes are now privately let, a rise of 109,000 homes since 2014/15 […] *In short, right to buy is increasingly failing to deliver on its stated guiding principle: to increase home ownership."*

5.14 Appendix 1 to the New Economics Foundation report sets out how many Right to Buy homes are now in the private rented sector by Authority (based upon Freedom of Information requests made by the New Economics Foundation). The appendix shows that in CWaC, 57% of all Right to Buy homes are now being let privately.

5.15 The report then notes the financial implications of the transfer of these homes into the private rented sector, stating that: *"All this places additional financial burdens on taxpayers because of the higher housing benefit costs arising from the transfer of what* [has] *been a socially rented property into being privately let. Because PRS rents are far higher than social rents, the private letting of former council homes costs taxpayers an additional £50m per year in housing benefit".*

5.16 It is important, therefore, that losses to affordable housing stock through the Right to Buy are taken into account to reflect the actual level of affordable houses available. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery Compared to Affordable Housing Needs

2013 SHMA **(CD 7.09)**

5.17 Figure 5.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 714 net affordable dwellings per annum between 2013/14 and 2017/18, as set out in the 2013 SHMA.

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Figure 5.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2013 SHMA, 2013/14 to 2017/18

Monitoring Year	Additions to AH Stock (Net of RtB)	2013 SHMA AH Needs (Net)	Annual Surplus / Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2013/14	149	714	-565	-565	21%
2014/15	800	714	+86	-479	112%
2015/16	190	714	-524	-1,003	27%
2016/17	408	714	-306	-1,309	57%
2017/18	503	714	-211	-1,520	70%
Total	**2,050**	**3,570**	**-1,520**		**57%**
Avg. Pa	***410***	***714***	***-304***		

Source: MHCLG Data and 2013 SHMA

5.18 Since the start of the 2013 SHMA period in 2013/14 affordable housing completions (net of Right to Buy) have averaged just 410 net affordable dwellings per annum, against a need of 714 net affordable dwellings per annum. A shortfall of -1,520 affordable dwellings has arisen over the five-year period, equivalent to an average annual shortfall of -304 affordable dwellings.

5.19 As demonstrated by Figure 5.3, delivery of only 410 affordable homes net of Right to Buy over the period means that just 57% of identified affordable housing needs were met. Put another way 43% households in need of an affordable home were let down by the Council's inability to deliver.

5.20 As previously stated, between 2017/18 – 2025/26 CWaC doesn't have a published position on affordable housing need, resulting in a period of seven-years where affordable housing need has not assessed. At the start of this seven-year period, the Council already had a shortfall in affordable housing delivery of -304 dwellings per annum, therefore, any affordable housing delivery from 2018/19 onwards would have had to address that pre-existing shortfall and also meet current needs to ensure that the affordable housing needs of the local community were being met.

2026 HNA **(CD7.10)**

5.21 The 2026 HNA covers the period between 2025 and 2045. The 2026 HNA identifies a need for 1,694 affordable housing per annum, however, as the delivery data for the first monitoring year of 2025/26 is not yet available, subsequently I have not been able to analyse the delivery against the needs identified in the 2026 HNA.

5.22 Given the average net delivery over the last four years (up to 2025) is 482 affordable dwellings per annum, in my opinion, it is highly unlikely that the delivery will have increased by over three times to meet the need identified in the 2026 HNA.

Consequences of Failing to Deliver Affordable Housing

5.23 Drawing the above evidence together, demonstrates that across CWaC the delivery of affordable housing has fallen persistently short of meeting identified needs. When measured against the 2013 SHMA (monitoring data is not yet available to compare to the 2026 HNA), between 2013/14 and 2017/18 (up to the end of the 2013 SHMA period), an average of 410 net affordable homes have been completed each year, compared with an identified requirement of 714 dwellings per annum. As a result, a substantial cumulative shortfall has emerged, amounting to -1,520 affordable homes over the five-year period; equating to an average annual shortfall of -304 affordable dwellings.

5.24 The consequences of failing to meet affordable housing needs in any Local Authority, including CWaC are significant.

5.25 In December 2025, MHCLG published 'A National Plan to End Homelessness' **(CD6.04),** which noted that there is a record 132,410 households, including 172,420 children, living in temporary accommodation in England[5]. It goes on to highlight that *"whilst some temporary accommodation is of decent quality, much is not. At the worst extreme, 2,070 families are currently living in B&B-type accommodation and hostels beyond the 6-week statutory limit. This is both unlawful and deeply damaging"* (page 11).

5.26 The CWaC Homelessness and Rough Sleeping Strategy 2025 – 2030 **(CD7.08)** acknowledges *"there is a lack of social housing, and our housing register continues to grow…there has been an increase in the use of temporary accommodation over the last five years, and to meet this demand the Council has relied on hotel*

[5] MHCLG (2025) Statutory Homelessness in England, available: Statutory homelessness in England April to June 2025 – GOV.UK

accommodation. Hotel accommodation is expensive and can have a negative impact on households due to limited facilities and lack of support" (page 19) (my emphasis).

5.27 The consequences of failing to provide enough affordable homes were recognised by the Inspector presiding over an appeal in Mole Valley where I provided affordable evidence **(CD8.07, p.16, [88])**. Inspector McGlone was clear at paragraph 88 of his decision that:

> *"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".*

5.28 In addition to the above, other key consequences of households being denied a suitable affordable home have been identified as follows:

- 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 support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increased national housing benefit bill.

5.29 These harsh consequences fall upon real households, individuals and children, and 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.

5.30 These sentiments about the importance of a good quality affordable home are echoed in the CWaC Borough Plan 2024 – 2028, which states that *"a good home is the bedrock of a good quality of life. Unfortunately, there is a national housing crisis, with real pressure on the cost and availability of housing"* (page 44). It goes to note with regards to the position in CWaC, *"average house prices in the Borough are seven times the local average wage and rents are higher than the national average"* (page 44).

Summary and Conclusions

5.29 The above evidence demonstrates that across CWaC, the delivery of affordable housing has fallen persistently short of meeting identified needs.

5.30 Since the start of the Local Plan (Part One) period in 2010, affordable housing delivery (net of Right to Buy) represented just 27% of overall housing delivery, equating to just 383 affordable dwellings per annum.

5.31 Since the beginning of the 2013 SHMA period in 2013/14, affordable housing delivery (net of Right to Buy losses) has significantly underperformed against identified needs. Between 2013/14 and 2017/18, an average of 410 net affordable homes have been completed each year, compared with an identified requirement of 714 dwellings per annum. As a result, a substantial cumulative shortfall has emerged, amounting to -1,520 affordable homes over the five-year period; equating to an average annual shortfall of -304 dwellings.

5.32 The Council has not undertaken an assessment of affordable housing need for the period between 2017/18 and 2025/26. As a result, affordable housing needs have been formally identified or evidenced for approximately seven years.

5.33 The 2026 HNA identifies a need for 1,694 affordable homes per annum for the period 2025/2045. However, as affordable housing delivery data for 2025/26 is not yet available, it is not possible to assess delivery performance against this identified need. That said, the average net delivery of affordable housing since 2018/19 has been 394 affordable dwellings per annum; therefore, a four-fold uplift in delivery would be required if the 2026 HNA identified need is to be met.

5.34 It is clear that a 'step change' in affordable housing delivery is needed now in CWaC to address these shortfalls and ensure that the future Authority-wide needs for affordable housing can be met. Failure to do so will mean the consequences identified above will only get worse and start to impact a wider number of households in CWaC.

5.35 In light of the identified level of need there can be no doubt that the delivery of up to 33 affordable dwellings on the proposed site will make an important contribution towards meeting evidenced affordable housing accommodation needs of the CWaC community as identified through the 2013 SHMA, prepared for CWaC. Therefore, in accordance with the provisions of NPPF Policy HO7, the benefit of the contribution of affordable housing, as part of the appeal scheme, in the planning balance should be **substantial.**

Other Relevant Evidence - Affordability Indicators and Future Supply

Section 6

Introduction

6.1 The recently published revised NPPF notes at Policy HO7 that substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments and other relevant evidence.

6.2 The previous Section duly presented such evidence on the unmet affordable housing needs in CWaC compared to the 2013 SHMA (the most recent assessment for which monitoring data is available). The substantial weight as advoked in the NPPF is thus triggered.

6.3 This Section of my evidence provides a plethora of "other relevant evidence", as also advocated in the NPPF, in the form of a range of affordability indicators which evidence the affordability challenges faced by the local community. The delivery of up to 33 affordable homes as part of these appeal proposals will undoubtedly contribute towards meeting these evidenced affordable accommodation needs of the community.

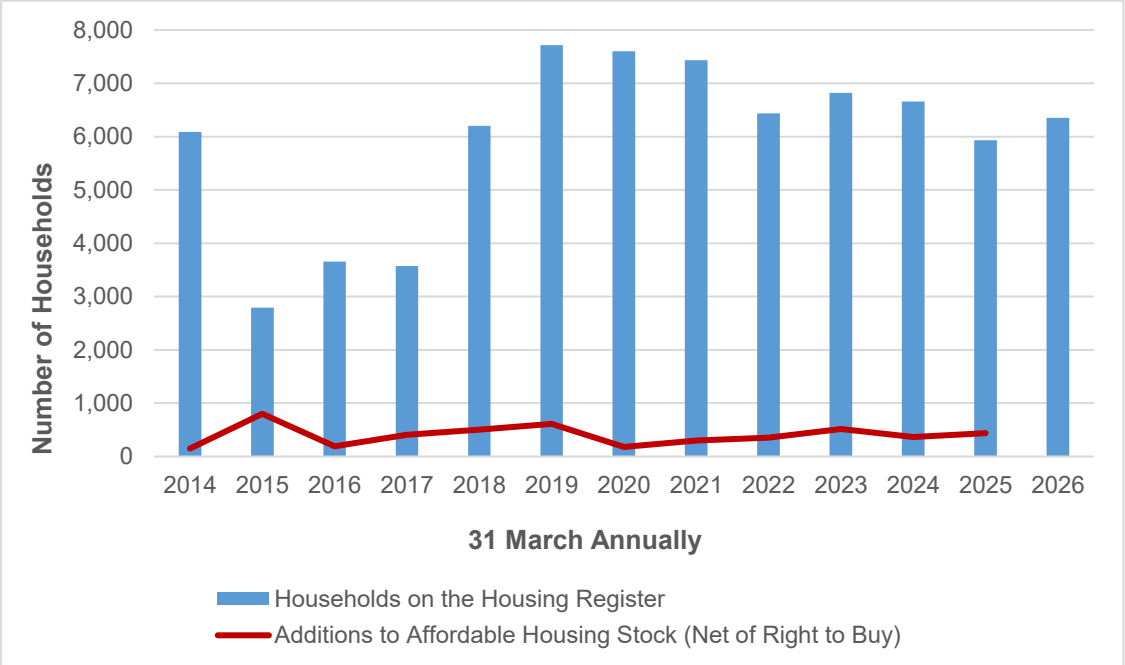
Housing Register

6.4 The CWaC Housing Strategy 2025 – 2030 **(CD7.07)** notes that *"whilst Cheshire West is an affluent borough the overall picture masks stark gaps between areas of prosperity and deprivation…some 24,670 local people live in neighbourhoods ranked in the most deprived 10% in England*" (page 7).

6.5 West Cheshire Homes notes on its website that as of 3 November 2026 (**Appendix JS3**) that there are 6,351 applicants on the Housing Register. This represents a 7% increase from the MHCLG reported position as of 31 March 2025 of 5,931 households on the Housing Register.

6.6 Figure 6.1 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 CWaC. This starts in 2014, after the Council introduced a Common Allocations Policy under the Localism Act 2011.

Figure 6.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2014 to 2026



Source: MHCLG Open Data and 2026 data from West Cheshire Homes (Appendix JS3)

6.7 As Figure 6.1 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 CWaC since 2014.

6.8 Footnote 4 of MHCLG[6] Live Table 600 highlights that:

> *"The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, contributed to a rise in the number of households on housing registers. The Localism Act 2011 then contributed to a decrease in the number of households housing registers, as it allowed local authorities to set their own qualification criteria."*

6.9 Evidently the result of the Localism Act is that many Local Authorities, including CWaC, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

6.10 Following the changes brought about by the Localism Act, West Cheshire Homes (a partnership between the Council and those Registered Providers with housing stock in the area) published a revised Housing Allocations Scheme in October 2013 and more recently in 2021, with the Cheshire West Common Allocations Policy 2021 –

[6] Ministry of Housing, Communities and Local Government

2026 now being the most up to date policy. The latest policy made a number of amendments including to the local connection rule (now requiring a minimum of two years of residency in the Borough) and reducing the income and savings thresholds for households being excluded from the Housing Register (as set out in the CWaC Report to Cabinet 18 March 2020).

6.11 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.

6.12 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester (**CD8.01, p.11, [63]**) in August 2017, where I presented the affordable housing evidence. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

> "*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. Consequently, I attach substantial weight to this element of the proposal*" (my emphasis).

6.13 Furthermore, in the appeal at Oxford Brookes University Campus at Wheatley, (**CD8.08, p74, [13.101]**), where I also presented the evidence, Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

> "*It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses*" (my emphasis).

6.14 The Inspector went on to state at paragraph 13.102 that:

> "*Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list*" before concluding that "*Given the*

importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight".

6.15 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

"*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*".

6.16 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In

6.17 my opinion the numbers on LPA's housing register remains high.

6.18 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 B definitions i.e. social rented, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership including shared, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

6.19 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.

6.20 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

6.21 The CWaC Housing Strategy **(CD7.07)** explains that social housing in CWaC is advertised and allocated via a Choice Based Lettings (CBL) system known as West Cheshire Homes. It goes on to set out that during 2023/24, there were 1,318 properties advertised through CBL and over 38,463 bids received but only 1,043 social housing properties were let during that 12 months (page 10). This demonstrates that there was significantly more demand for social housing in CWaC compared to the supply; meaning not tens or hundreds but thousands of households who bid on the available supply of properties will have missed out and not been awarded one of the social housing lettings.

Temporary Accommodation

6.22 MHCLG statutory homelessness data highlights that on 31 March 2025, there were 74 households housed in temporary accommodation by the Authority, with 24% of these being households with children.

6.23 The CWaC Housing Strategy 2025 – 2030 notes that a large proportion of temporary accommodation is provided in the form of hotels, which generate significant costs for the Council. MHCLG data indicates that CWaC spent £3,346,000 on temporary accommodation between 1 April 2024 and 31 March 2025; with over £2.9m of this being on Bed and Breakfast Hotels.

6.24 One of the measures of success of the Housing Strategy is identified as being a reduction in the use of unsuitable hotels as temporary accommodation and increasing the number of affordable homes.

6.25 The CWaC Homelessness and Rough Sleeping Strategy 2025 – 2030 includes as one of its priorities (Priority Three of the Vision) to develop and improve access to a range of settled, supported and temporary accommodation options.

6.26 The *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* report published in August 2019 by the Children's Commissioner **(CD7.11)** found that temporary accommodation presents serious risks to children's health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.

6.27 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*".

Homelessness

6.28 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 924 households in need of homelessness prevention duty[7], and 830 households in need of relief duty[8] from the Council.

6.29 The CWaC Homelessness and Rough Sleeping Strategy 2025 – 2030 **(CD7.08)** identifies tackling homelessness and rough sleeping as a key priority for the Council. It seeks to achieve this through the following three strategic priorities: i) prevent homelessness through early intervention and personalised housing options; ii) end rough sleeping and support those with complex needs; and iii) develop and improve access to a range of settled, supported and temporary accommodation options (page 12).

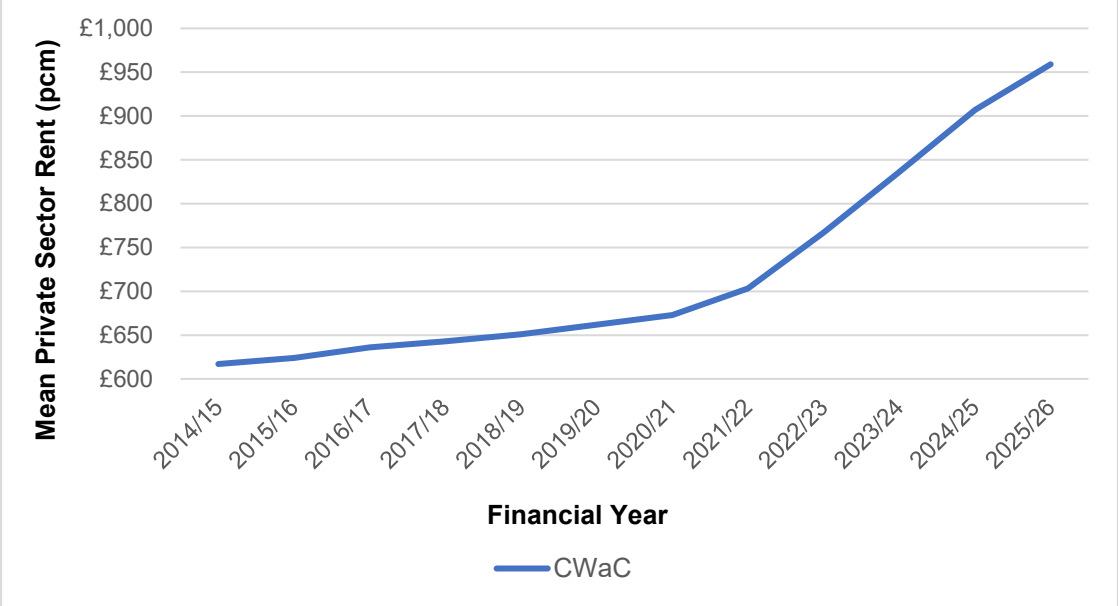
6.30 The role that delivery of additional affordable homes can play is highlighted by the Council in Priority three of the CWaC Housing Strategy 2025 – 2030 **(CD7.07)** 'Affordable homes of all tenures across the Borough', noting *"it is important that everyone who lives in our borough can find a permanent home that they can afford whether they are looking to rent or buy. We need more affordable homes to meet the needs of local residents and address homelessness"* (page 21) (my emphasis).

Private Rental Market

6.31 Office for National Statistics ("ONS") data (first produced in 2014/15) shows that average (mean) private rents in CWaC stood at £959 per calendar month ("pcm") in 2025/26. This represents a 6% increase in a single year from 2024/25 where average private rents stood at £907 pcm.

[7] 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.
[8] 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 6.2: Average (Mean) Private Sector Rents in CWaC, 2014/15 to 2025/26



Source: VOA and ONS.

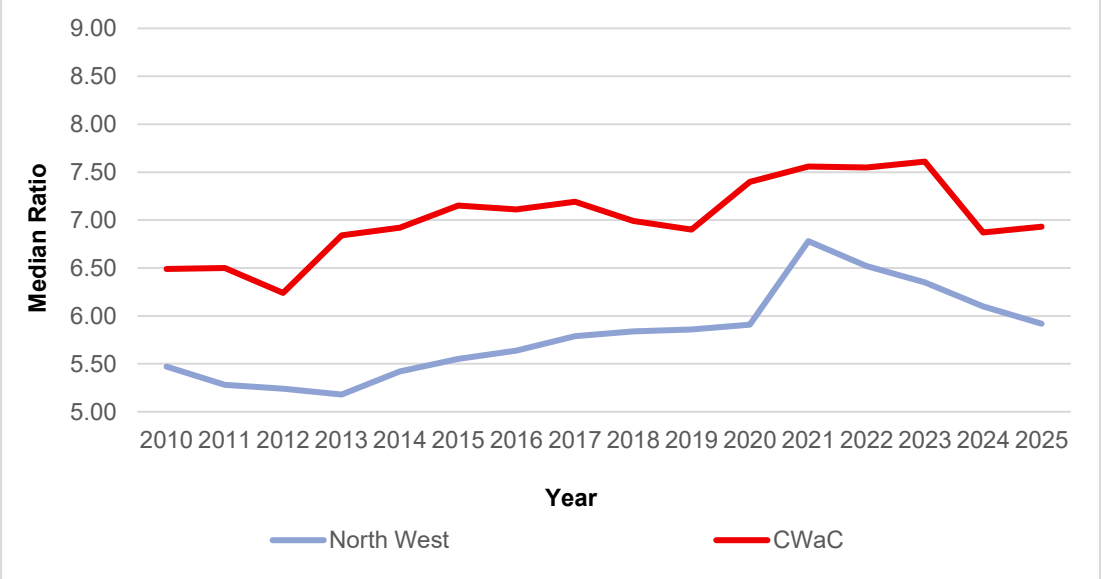
6.32 Figure 6.2 demonstrates that private rents in CWaC have increased substantially over the past decade, rising from £617 pcm in 2014/15 to **£959 pcm in 2025/26**. This is an increase of 55% over the period. Over the last four years alone, private rents in CWaC have increased by approximately £256 pcm (+36%). This steep upward trend, particularly from 2020/21 onwards, highlights the growing affordability pressures facing households in the private rented sector and reinforces the need for the delivery of affordable housing within the Borough.

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

Median House Prices

6.34 The ratio of median house prices to median incomes in CWaC now stands at **6.93**.

Figure 6.3: Median Workplace-Based Affordability Ratio comparison, 2010 to 2025



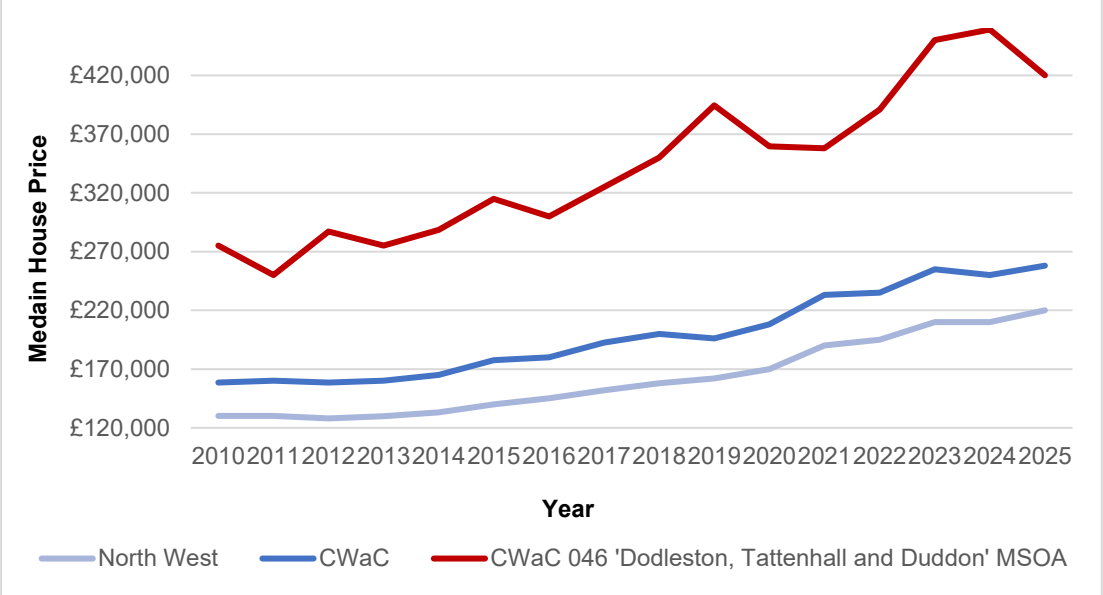
Source: ONS.

6.35 The median affordability ratio for CWaC stands above the regional average for the North West by 15%. In addition, the affordability ratio for the North West has been improving (decreasing) since 2021, however, in CWaC the ratio has started to increase again between 2024 and 2025, highlighting more acute affordability issues in CWaC compared to the North West region.

6.36 Figure 6.4 below compares the median house sale prices for the North West, CWaC and the CWaC 046 'Dodleston, Tattenhall and Duddon' MSOA. It demonstrates that they have increased dramatically between the start of the Local Plan (Part One) period in 2010 and 2025; particularly in the MSOA.

Continued Overleaf

Figure 6.4: Median House Price Comparison, 2010 to 2025



Source: ONS

6.37 The median house price across CWaC 046 'Dodleston, Tattenhall and Duddon' MSOA has risen by 53% from £275,000 in 2010 to £419,995 in 2025. The 2025 house price figure for the MSOA is 48% higher than the CWaC figure of £258,000 and 62% higher than the North West figure of £220,000. This demonstrates that affordability is particularly challenging in Tattenhall.

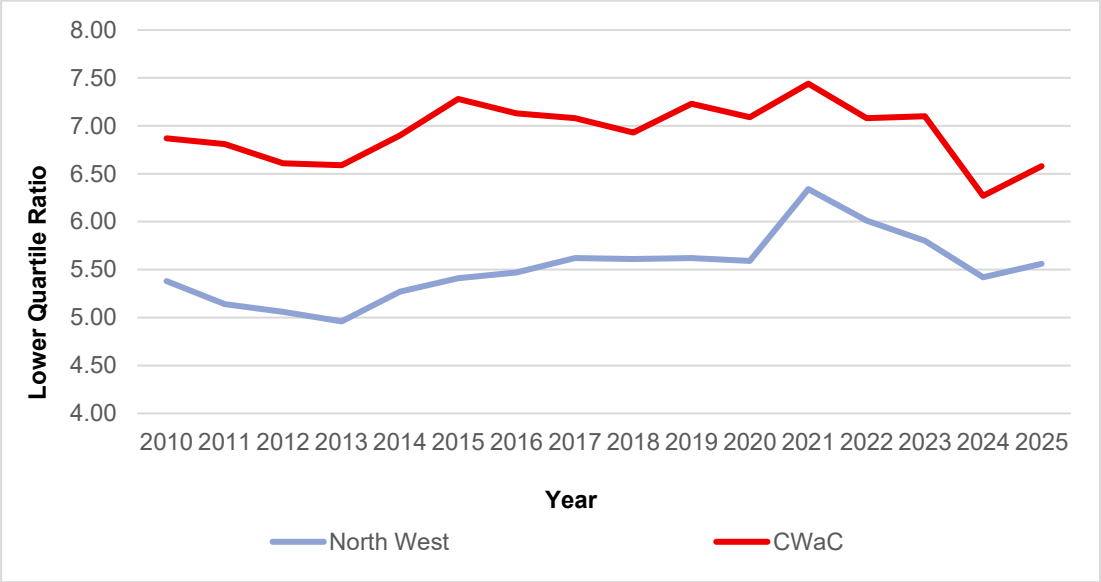
Lower Quartile House Prices

6.38 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in CWaC in 2025 stood at **6.58**.

6.39 This means that those on lower quartile incomes in CWaC, seeking to purchase a lower quartile priced property, now need to find almost seven times their annual income to do so.

6.40 The ratio in CWaC stands 18% above the North West figure of 5.56. It follows that housing in this area is significantly unaffordable for a significant part of the local population.

Figure 6.5: Lower Quartile Workplace-Based Affordability Ratio comparison, 2010 to 2025



Source: ONS

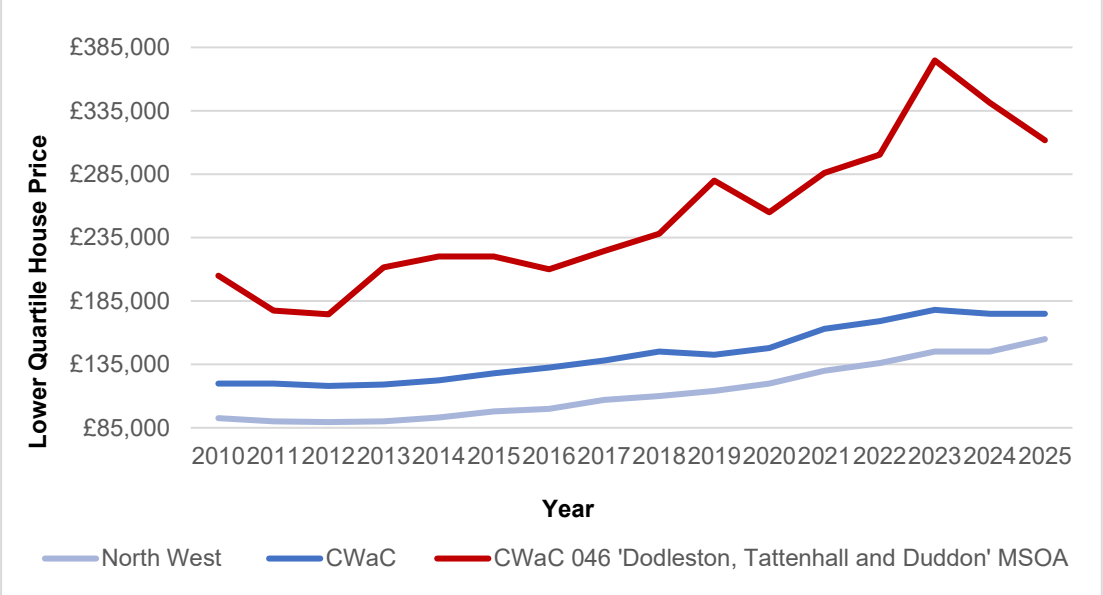
6.41 Similarly to the median affordability ratio, the lower quartile ratio in CWaC is also increasing and at a sharper rate that the regional increase. Again this demonstrates the affordability challenges in CWaC, with the steeper rise indicating more acute affordability issues locally.

6.42 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 46% higher than that.

6.43 Figure 6.6 below compares the lower quartile house sale prices in the CWaC 046 'Dodleston, Tattenhall and Duddon' MSOA with CWaC and the North West. Once again, it demonstrates that they have increased dramatically between the start of the Local Plan (Part One) period in 2010 and 2025.

Continued Overleaf

Figure 6.6: Lower Quartile House Price Comparison, 2010 to 2025



Source: ONS.

6.44 The lower quartile house price across CWaC 046 'Dodleston, Tattenhall and Duddon' MSOA has risen by 52% from £205,000 in 2010 to £311,748 in 2025. This figure is 56% higher than the CWaC figure of £175,000 and 67% higher than the North West figure of £154,950.

6.45 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, Wiltshire (**CD8.06, p.17, [78-79]**) in January 2022. In considering the 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).

The Future Supply of Affordable Housing

6.46 The Council has published its latest Housing Land Monitor Summary Report 2026 (2026 HLM) (**CD6.03**), covering the period 1 April 2026 to 31 March 2031.

6.47 The 2026 HLM includes a forward supply of 3,269 dwellings for the period 2026 - 2031; generating a 1.6 year supply of housing against the Local Housing Need (Standard Method + 5% buffer). This includes a total of 210 dwellings on small sites.

6.48 Local Plan (Part One) Policy SOC1 seeks 30% affordable housing on sites in urban areas of 10 or more dwellings and on sites in rural areas of three or more dwellings. Therefore, if any of the small sites included in the forward supply are located in urban areas and indeed if any others proposed less than 3 dwellings, these sites won't trigger the need to provide an element of affordable housing.

6.49 However, notwithstanding the above, if I were to generously to assume that all 3,269 dwellings included in the 2026 HLM forward supply 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. 30%) as a proportion of overall housing completions, this is likely to deliver only 981 affordable dwellings over the period, equating to just 196 new affordable dwellings per annum.

6.50 This figure falls substantially short of the 1,694 affordable housing need per annum identified in the 2026 HNA.

6.51 Furthermore, if one were to assume that the past gross affordable housing provision over the last 15 years of 32% (Figure 5.1) is to be continued over the next five years, this is likely to deliver only 1,046 affordable dwellings over the period, equating to just 209 new affordable dwellings per annum. Again, this is still substantially below the identified need of 1,694 affordable homes per annum.

6.52 It is also worth highlighting that not all the sites within the 2026 HLM forward supply will come forward on sites meeting the threshold requirements to provide an element of affordable housing, therefore, the delivery of 196 new affordable homes per annum, or based on the prevailing gross delivery rate 209 per annum, over the next five years is considered to be an over-estimation, with likely delivery to be even less.

6.53 In addition, the fact that CWaC cannot demonstrate the required five year supply of housing, means it is not just under providing on the delivery of housing, but also on the delivery of affordable housing. In very simple terms, if it was assumed that all 10,135 dwellings (required to achieve a five year supply) were to come forward on eligible sites for affordable and that all would provide policy compliant levels of affordable, this would mean CWaC would deliver 3,041 affordable homes over the next five year, or 608 per annum. This means that there are at least 2,060[9] affordable homes over the next five years not being built; which in an Authority where this is already an acute affordable housing crisis will just seek to exacerbate the issue.

6.54 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

6.55 As demonstrated through the analysis of other relevant evidence in this Section, affordability across CWaC has been, and continues to be, in crisis.

6.56 House prices and rent levels in both the median and lower quartile segments of the market are high, particularly in the MSOA, 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 CWaC out of the reach of more and more people.

6.57 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in CWaC, with a lower quartile house price to average income ratio of 6.58.

6.58 Market signals indicate a worsening trend of affordability in CWaC and within CWaC 046 'Dodleston, Tattenhall and Duddon' MSOA. By all accounts, this is an Authority experiencing an affordable housing crisis, where it is critical that action is taken to increase affordable housing delivery.

[9] 3,041 – 981 = 2,060

6.59 The delivery of up to 33 affordable homes as part of the appeal proposals will, therefore, contribute to meeting the evidenced affordability challenges facing the local community, which are currently impacting upon the ability of households to meet their accommodation needs.

6.60 It has also been demonstrated that the Council is unlikely to be able to meet its affordable housing needs over the next five years, with a generous calculation estimating the delivery of 196 new affordable homes per annum against an identified need of 1,694 affordable dwellings per annum; resulting in a significant shortfall with many households not having their affordable housing needs met.

6.61 Consequently, there is a substantial need for more affordable housing now. In light of the Council's shortfall of affordable housing delivery and the volatility of future affordable housing delivery there can be no doubt that the provision of up to 33 affordable dwellings on this site to address the Authority-wide needs of CWaC should be afforded **substantial weight** in the determination of this appeal.

Council and Rule 6 Assessment of the Proposals

Section 7

Introduction

7.1 This Section of the evidence considers the Council's Assessment of the appeal proposals during the course of the application and the appeal process, alongside the Rule 6 Statement of Case.

CWaC Housing Policy Officer

7.2 The CWaC Housing Policy Officer's response of July 2025 **(CD3.06)** states that the *"the provision of 33 units of affordable accommodation is supported".* It goes on to explain that the 2013 SHMA **(CD7.09)** indicated a need for 15 affordable dwellings per annum in the Tattenhall sub-area split between a need for 12 one-bedroom dwellings, 2 two-bedroom 1 three-bedroom property per year (as explained in Section 5 the sub-areas of CWaC are different between the 2013 SHMA and 2026 HNA).

7.3 With regards to delivery, the Officer notes, *"there has been some affordable provision in Tattenhall in recent years to meet the need for two and three bedroom affordable properties, however, since the Strategic Housing Market Assessment in 2013, only two one-bedroom affordable homes per annum of the recommended 12 units p.a. have been completed".*

7.4 Therefore, there the Officer highlights that the social rented element should include one bedroom homes. This will be a matter for the Reserved Matters application.

LPA Statement of Case

7.5 As this appeal is against the failure of CWaC to determine planning application 25/01764/OUT, there was no Officer's Report or Decision Notice available at the time the appeal was lodged.

7.6 Instead, the LPA's Statement of Case submitted in September 2026 appends the Officer's Report (Appendix A) setting out the Council's assessment of the proposals had the application been determined by the LPA. A draft Decision Notice is also included (Appendix B) setting out two putative reasons for refusal, one of which is

failure to secure the necessary planning obligations which includes affordable housing provision.

7.7 The Officer's Report acknowledges that the CWaC HNA (February 2026) is the most up to date evidence of housing need across the Borough and notes it identifies a clear requirement for two and three bedroom homes (paragraph 6.93).

7.8 Reference is also made to the Tattenhall Housing Needs Report (2023) **(CD6.01)**, with the LPA noting it identifies *"a strong need for smaller and more affordable homes… alongside a shortfall in affordable housing. This reflects local affordability pressures and housing register demand, reinforcing the importance of delivering policy-compliant affordable housing"* (paragraph 6.94) (my emphasis).

7.9 Whilst the Officer's Report acknowledges affordability pressures in Tattenhall and a shortfall in affordable housing provision, the only mention of affordable housing in the LPA's SoC is in relation to the absence of a secured S106 Planning Obligation, which does form one of the Council's putative reasons for refusal. In the usual way, Gladman are preparing a S106 and fully anticipate this will resolve this reason for refusal in advance of the appeal.

7.10 The Council has not given any consideration to the past delivery shortfalls of affordable housing, the challenging affordability indicators and the benefits that the provision of much needed affordable housing will bring to the local community. I have set out in this Proof of Evidence that there is already a significant and indeed growing need for affordable housing in CWaC and that the needs of many households just aren't being met. In addition, looking forward, it is unlikely that CWaC will be able to meet the identified affordable housing needs over the next five years.

7.11 Therefore, it does not appear that this specific benefit in its own right has been properly considered by the Council as part of the planning balance exercise. Section 2 of my Proof of Evidence sets out why affordable housing is an important material consideration that should be weighted in the planning balance.

Rule 6 Statement of Case

7.12 Tattenhall & District Parish Council has Rule 6 status and has prepared and submitted a Statement of Case.

7.13 In summary, the Parish Council maintains its objection to the proposals. With regards to affordable housing, the SoC refers to the Tattenhall HNA (2023) noting it identifies an estimated annual shortfall of 12 affordable rented homes for the Parish. As already

set out in Section 4, this represents a narrow snap-shot in time which only takes account of those already based in Tattenhall on the Housing Register, ignoring those households in need who reside outside of Tattenhall and either have a local connection to Tattenhall or a preference for an affordable home in that area. Furthermore, it doesn't account for any households in need of affordable home ownership, therefore, doesn't capture the full spectrum of households in need as per the NPPF Annex B definition.

7.14 Given the Neighbourhood Plan seeks to allocate housing, that's affordable housing contribution will exceed the 12 homes, in my opinion the findings of the Tattenhall HNA is not a reason to reduce the weight to the affordable housing offer.

Summary and Conclusions

7.15 I do not consider that the Council nor the Rule 6 Party have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.

7.16 The acute level of affordable housing need in CWaC, coupled with a shortfall in 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.

7.17 In my opinion, the Council has thus far sought to downplay the provision of up to 33 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 **substantial weight** in the determination of this appeal.

Benefits of and Weight to be Attributed to the Proposed Affordable Housing at the Appeal Site

Section 8

8.1 This Section brings together all the evidence presented and identifies and considers the benefits and weight to be attached to the proposed affordable housing provision as part of the appeal.

8.2 The objectives of Section 6 of the NPPF set out the Government's clear objective of supporting *"the delivery of a substantial increase in the supply of homes…this includes planning for an appropriate mix of accommodation for the local community".*

8.3 NPPF Policy HO1 notes that *"at the most appropriate level, development plans should also take into account an assessment of the size, type and tenure of housing or other accommodation needed for different groups. These groups include but are not limited to a) those who require affordable housing (including Social Rent) as defined in the glossary at Annex B"* (my emphasis).

Benefits of Providing Affordable Housing

8.4 As set out in the previous Sections there are significant social and economic consequences for failing to meet affordable housing needs at both national and Local Authority level; CWaC is no exception to this.

8.5 NPPF Policy HO8 requires development proposals to *"meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures relevant to the location"* (my emphasis).

8.6 In this instance, the appeal proposals accord with the provisions of NPPF Policy HO8 as the affordable housing offer meets the requirements of adopted Policy SOC1 of the Local Plan (Part One). It should be noted that these Local Plan policies were drafted to capture a benefit rather than to ward off harm or be needed in mitigation.

8.7 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton **(CD8.05, p.14,[72])** in September 2018 who was clear at paragraph 72 of their decision that:

"[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).

8.8 NPPF Policy HO7 now gives *"substantial weight"* to the benefits of providing homes (including affordable homes) where these will contribute towards meeting evidenced accommodation needs of the community.

8.9 The benefits of the provision of affordable housing as part of this appeal scheme are:

- Policy compliant offer of 30% (up to 33 dwellings) of the scheme provided as affordable housing;
- Mix of affordable housing tenures to reflect local needs at that time;
- Contributing to the accommodation needs of the community given the evidenced shortfall in affordable housing delivery against the identified affordable housing needs in the 2013 SHMA;
- Assisting in addressing the evidenced affordability challenges faced by the local community; and
- Providing better quality affordable homes with benefits such as improved energy efficiency and insultation.

8.10 Therefore, it is clear that the provision of affordable housing as part of the appeal proposals should be a benefit that is given substantial weight as it can contribute to meeting evidenced accommodation needs of the community.

8.11 Section 5 has demonstrated that against the identified needs in the 2013 SHMA, there was an annual average shortfall of -304 affordable dwellings during the period 2013/14 and 2017/18.

8.12 Given that affordable housing delivery data for 2025/26 is not yet available, it is not possible to assess delivery performance against the identified need of 1,694 affordable dwellings per annum (2026 HNA). However, the average net delivery of affordable housing since 2018/19 has been 394 affordable dwellings; therefore, a four-fold increases in delivery is needed if the 2026 HNA identified need is to be met.

8.13 In addition, Section 6 presents other relevant evidence in the form of a range of affordability indicators, illustrating the significant affordability challenges faced by the local community and the insufficient future affordable housing supply.

8.14 The importance of affordable housing as a material consideration has gained increased prominence through the publication of the revised NPPF, with a number of appeal decisions acknowledging the substantial weight to be given to the provision of affordable housing, including:

- **Appeal Ref: 6005671 'Land South of Green Road, Wivelsfield Green' (6 October 2026) (CD8.04)** – provision of 40% affordable housing, with the Inspector concluding at paragraph 81: *"given the substantial weight that I have attributed to the Council's housing land shortfall and under delivery of affordable housing the benefits of granting permission would not be substantially outweighed by any adverse effects".*

- **Appeal 6008238 'Land North of A507, West of A10, Buntingford' (24 September 2026) (CD8.03) –** provision of 40% affordable alongside homes for the elderly and custom self-build housing, with the Inspector finding at paragraph 139: *"the substantial positive weight that I afford to <u>each</u> (my emphasis) of these benefits is necessary given the wording in national decision-making policy HO7 of the Framework which links to national decision-making policy HO1. Put another way, I find that the appellant has correctly disaggregated these benefits rather than considering them as one single benefit".*

- **Appeal 6005664 'Land West of Spratts Farm, Queenborough Road, Southminster, Essex (18 August 2026) (CD8.09)** – provision of 30% affordable, the Inspector concluded at paragraph 51: *"the (public) benefits of the scheme are numerous. I attribute substantial weight to the scheme's delivery of both market and affordable housing".*

Summary and Conclusions

8.15 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.

8.16 At the local level, these issues are also affecting households in CWaC, where delivery of affordable housing is failing to keep pace with identified needs.

8.17 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 the situation.

8.18 For CWaC, based on the current position, looking forward it is unlikely that future affordable housing needs will be met. Market signals indicate challenging affordability across CWaC, and, by any measures 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.

8.19 There is a clear, pressing, acute and on-going need for more affordable homes in CWaC. The delivery of up to 33 affordable homes proposed at the appeal site would make a sizeable contribution to meeting the evidenced accommodation needs of the community.

8.20 Considering the high numbers of households on the Housing Register and other indicators of poor affordability across CWaC, and inadequate future supply of affordable housing, there can be no doubt in my mind that the provision of up to 33 affordable dwellings on this site should be afforded **substantial weight** in the determination of this appeal.

8.21 Without a step change in approach, the acute level of affordable housing need in CWaC, coupled with challenging affordability and insufficient future supply of affordable homes, will detrimentally affect the ability of people to lead the best lives they can.

Appendix JS1

FOI Request Correspondence submitted on 16 October 2026

From: Amy James
To: "foiwest@cheshirewestandchester.gov.uk"
Subject: Freedom of Information Request - Housing Data
Date: 16 October 2026 16:35:00
Attachments: image001.png
image002.jpg
image003.png
image004.png
image005.png

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 Tattenhall, as well as the Cheshire West and Chester (CWaC) 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 9 of this request relate to data held by the Housing Department.
Questions 10 and 11 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

2. 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)
Tattenhall Ward	
Tattenhall and District Civil Parish	

3. 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	Tattenhall Ward		Tattenhall and District Civil Parish	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property

1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

-

4. Any changes the Council has made to its Housing Register Allocations Policy since 2021 including:

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

-

Social Housing Stock

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

Location	**Total Social Housing Stock (31 March 2026)**
Tattenhall Ward	
Tattenhall and District Civil Parish	

Social Housing Lettings

6. 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**
Tattenhall Ward		
Tattenhall and District Civil Parish		

-

Temporary Accommodation

-

7. The number of households housed in temporary accommodation within and outside of the Cheshire West and Chester area on the following dates:

-

Households in Temporary Accommodation	**31 March 2026**	**31 March 2025**
Households Housed within Cheshire West and Chester		

Households Housed outside Cheshire West and Chester		
Total Households		

-

8. The average amount of money spent on temporary accommodation per household within the Cheshire West and Chester area over the period 1 April 2025 and 31 March 2026.

9. The average amount of money spent on temporary accommodation per household outside the Cheshire West and Chester area over the period 1 April 2025 to 31 March 2026.

-

Housing Completions

10. The number of NET housing completions in Tattenhall Ward (or if data is only recorded at a Parish level then for the Tattenhall and District Civil Parish) broken down on a per annum basis for the period between 2000/01 and 2025/26.

11. The number of NET affordable housing completions in Tattenhall Ward (or if data is only recorded at a Parish level then for the Tattenhall and District Civil Parish) broken down on a per annum basis for the period between 2000/01and 2025/26.

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

Amy

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[1] As defined by Annex B of the National Planning Policy Framework (2026) which can be viewed here.

Appendix JS2

Relevant PPG Extracts

Relevant Extracts from Planning Practice Guidance

Appendix JS2

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 *"an affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need."* This is because: • *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* • *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.* *"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."*
Housing and Economic Needs Assessment	018 Reference ID 2a-018-20190220	Sets out that *"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".*
Housing and Economic Needs Assessment	019 Reference ID 2a-019-20190220	States that *"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)".*

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	020 Reference ID 2a-020-20190220	The paragraph sets out that in order to calculate gross need for affordable housing, *"strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:* • *the number of homeless households;* • *the number of those in priority need who are currently housed in temporary accommodation;* • *the number of households in over-crowded housing;* • *the number of concealed households;* • *the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and* • *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."*
Housing and Economic Needs Assessment	024 Reference ID 2a-024-20190220	The paragraph states that "*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".* It also details that: *"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."*
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: "*The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach)…"*
Housing Needs of Different Groups	001 Reference ID: 67-001-20190722	Sets out the relationship between affordable housing need and overall housing need: *"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."*

Relevant Extracts from Planning Practice Guidance

Appendix JS3

West Cheshire Homes Webpage Extract – Housing Register Data

The demand for social housing is very high. This means that you will need to be realistic in terms of the type of property you get and the area in which it is located. To help you, this page contains useful information so that you can make an informed decision when placing bids for any vacant properties that are advertised on this website.

- There are 6351 applicants on our housing register all looking for accommodation.
- There are 2075 applicants in bands A and B all looking for accommodation.
- From April 2025 to March 2026, only 1218 vacant properties have been advertised on this website.

Property and area waiting times

The below tables detail the average time in weeks that an applicant waited to be housed for a property by band during **April 2025 to March 2026.**

General needs accommodation - average wait times.

These are households who need accommodation for families and single/couple households who are under the age of 55.

Chester

Property Type	Band A	Band B
1 bed	31 weeks	66 weeks
2 beds	17 weeks	32 weeks
3 beds	27 weeks	108 weeks
4 beds	56 weeks	*No allocations*

Ellesmere Port

Property Type	Band A	Band B
1 bed	23 weeks	37 weeks
2 beds	17 weeks	28 weeks
3 beds	16 weeks	55 weeks
4 beds	60 weeks	151 weeks

Neston

Property Type	Band A	Band B
1 bed	37 weeks	35 weeks
2 beds	17 weeks	22 weeks

3 beds	18 weeks	73 weeks
4 beds	*No allocations*	*No allocations*

Northwich

Property Type	Band A	Band B
1 bed	28 weeks	35 weeks
2 beds	23 weeks	34 weeks
3 beds	33 weeks	104 weeks
4 beds	31 weeks	309 weeks

Winsford

Property Type	Band A	Band B
1 bed	29 weeks	31 weeks
2 beds	12 weeks	36 weeks
3 beds	16 weeks	49 weeks
4 beds	26 weeks	153 weeks

Over 55's accommodation - average wait times

These are households who meet the criteria for properties which we might sometimes refer to as "sheltered accommodation" where all household members are 55 or over.

Chester

Property Type	Band A	Band B
1 bed	16 weeks	27 weeks
2 beds	61 weeks	42 weeks

Ellesmere Port & Neston

Property Type	Band A	Band B
1 bed	24 weeks	66 weeks
2 beds	58 weeks	*No allocations*

Northwich

Property Type	Band A	Band B
1 bed	48 weeks	36 weeks

2 beds	19 weeks	38 weeks

Winsford

Property Type	Band A	Band B
1 bed	24 weeks	23 weeks
2 beds	45 weeks	62 weeks

Other useful information

- One and two bedroom properties were the most sought after property type in terms of bedroom requirement.
- In total, there are 1464 applicants in bands A and B looking for one-or two-bedroom properties.
- Only 9, 4-bedroom houses have been advertised since April 2025.
- The average waiting time for an applicant in band A is around 25 weeks and the longest an applicant in band A waited was 309 weeks.
- The average waiting time for an applicant in band B is 44 weeks and the longest an applicant in band B waited was 348 weeks.
- From April 2025 to March 2026, only 284 properties became available in Chester.
- From April 2025 to March 2026, only 293 properties became available in Ellesmere Port and Neston.
- From April 2025 to March 2026, only 179 properties became available in Northwich.
- From April 2025 to March 2026, only 226 properties became available in Winsford.

Note

“No allocations” means there were no allocations of that property size, to that Band in that particular area during this time period.