



Affordable Housing Technical Note - Appendix to Planning Evidence

Land south of the A271 and east of the
A22, Lower Horsebridge, Hailsham, East
Sussex

Appellant: Hertfordshire Holdings Ltd

Planning Inspectorate No. Appeal:
APP/C1435/W/23/3335625

Wealden District Council
Application ref: WD/2022/3222/MAO

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1 Introduction

- 1.1 This technical note has been prepared by Gemma Saffhill, Technical Director and viability expert at tor&co, for Hertfordshire Holdings Ltd (the Appellant). The report is prepared for a site known as land south of the A271 and east of the A22, Lower Horsebridge, Hailsham, East Sussex. (see CD1.3 for the Site Location Plan) This is hereafter referred to as the 'Appeal Site'.
- 1.2 The Appellant submitted an outline planning application for the development of the Site to Wealden District Council (WDC) in December 2022. The total number of homes to be provided is up to 124 dwellings (including affordable homes). The planning application reference number is WD/2022/3222/MAO, and it is herein referred to as the 'Appeal Scheme'. The planning application was refused by the delegated decision of the planning case officer on 30 June 2023, and it is that decision which is subsequently being appealed.
- 1.3 This technical note focusses specifically on the affordable housing provision proposed and how granting planning permission, as proposed, would impact beneficially on local affordable housing delivery. It informs the Planning Evidence of Andrew Elliot of tor&co in terms of the beneficial weight to be given to the delivery of affordable housing in the planning balance.
- 1.4 To prepare this technical note, a Freedom of Information (FOI) request was submitted to WDC on Friday 9th February 2024 (**Appendix One**). The Freedom of Information Act 2000 provides public access to information held by public authorities. Information was requested about the housing waiting list, social housing stock, housing completions and planning permissions. The associated correspondence received from WDC (7th March 2024) is at **Appendix Two**.

Qualifications and experience

- 1.5 I have an MA in Oriental Studies: Japanese, from Oxford University. I have 18 years' experience within the town planning field, specifically relating to advisory services for the delivery of affordable housing and economic viability assessments.
- 1.6 I joined tor&co in October 2020 as Technical Director for Affordable Housing and Viability. Prior to this I held the position of Director at DS2, a specialist economic viability consultancy, from 2013.
- 1.7 I simultaneously held a Board role and ultimately Head of Development Committee role for the Affordable Housing Provider now known as PA Housing.
- 1.8 Since 2005 I have also worked with a specialism in affordable housing delivery and viability at the London-based planning consultancy Quod, the multi-disciplinary agency Knight Frank and completed a secondment at Homes England (contemporaneously The Homes and Communities Agency).
- 1.9 I advise on a wide variety of projects at various stages throughout the planning process, normally specialising in explaining how the planning gain package of measures proposed by an applicant appropriately addresses both local and national policy tests.

- 1.10 My experience of providing advice on scheme viability and affordable housing delivery throughout the development process from consideration of land purchase through to completed development on site and onward sale to an Affordable Housing Provider, provides me with a broad understanding of the entire development context.
- 1.11 The maximum recommended term of 9 years' Board level experience for an Affordable Housing Provider indelibly informs my view on the advantages of a secure home for any individual and family.

Context

- 1.12 The proposed affordable housing contribution, to be secured via the section 106 agreement (s106), is 35%, or up to 43 affordable dwellings on site. in accordance with *Policy AFH1: Affordable Housing* of the Wealden District Council Affordable Housing Delivery Local Plan (May 2016).

Structure

- 1.13 This note examines the affordable housing proposed in the Appeal Scheme, to assess whether the proposal in general terms meets the objectives of the local affordable housing policies.
- 1.14 It then considers local affordable housing need, and how the delivery of affordable housing over the lifetime of the Wealden District Core Strategy Local Plan (adopted 2013) (CD5.2) has addressed that identified housing need. This gives a sense of how well WDC has been able to address its own housing need in the past.
- 1.15 The note then turns to examine the potential affordable housing supply that could be brought forward, as one constituent part of the future development capacity identified in the WDC 5YHLS Position Statement – as of 1st April 2023 (Dec 2023) (CD10.1).
- 1.16 Finally, the note considers; housing affordability in the local market, the depth of affordable housing need for social/affordable rented homes and for intermediate homes and the potential benefits of affordable housing provision for its future residents.

2 Proposed affordable housing

Policy Context

- 2.1 Currently the local Development Plan (hereafter ‘the Plan’) comprises the following documents:
- Wealden District Local Plan Core Strategy 2013 – 2027 (Feb 2013)
 - The saved policies of the adopted Wealden Local Plan (1998)
 - Affordable Housing Delivery Local Plan (May 2016)
 - Waste and Minerals Local Plan (Feb 2013) and Waste and Minerals Sites Plan (Feb ’17)
 - Hellingly Neighbourhood Plan (Feb 2021)
- 2.2 Upon the adoption of the Wealden Local Plan in 2013, Policy WCS8 and the associated text in paragraphs 7.10 – 7.14 contained the relevant policy and guidance to affordable housing delivery. However, in 2016 this policy was superseded by the adoption of the Affordable Housing Delivery Local Plan. As a result, *Policy AFH1: Affordable Housing* is now the policy which dictates affordable housing supply in the district. This policy requires the delivery of 35% affordable housing on all development sites which propose 5 or more (net) dwellings.
- 2.3 On 8 February 2024, WDC resolved to publish a Reg 18 Local Plan, including site allocations, for consultation in March - April 2024.
- 2.4 Of key relevance to this technical note is also the WDC *Five Year Housing Land Supply Statement – as of 1 April 2023*, published in December 2023. This sets out WDC’s anticipated housing supply position over the next five years, with a base date of 1 April 2023, to 31 March 2028.
- 2.5 The latest Housing Land Supply Statement (HLSS) identifies a HLS of **3.83 years**, representing a reduction relative to the previous HLSS, base dated 1 April 2022, which identified a HLS of 3.92 years, as referenced by officers in the delegated report for the appealed application.

The importance of housing in the Plan

- 2.6 The Wealden District Local Plan Core Strategy 2013 – 2027 establishes at paragraph 2.17 that:

*‘Wealden’s good quality of life, and its proximity to London and the Crawley/Gatwick growth area, creates a high demand for housing, especially in the north of the District. Demand has, in the past, exerted considerable upward pressure on house prices, and has caused a widening gulf between local incomes and market prices, **and led to severe shortages of affordable housing**. Whilst the affordability gap between incomes and house prices can be addressed in part by economic processes **the need to provide affordable housing stock remains a priority for the Council**. This demand for affordable housing*

also provides a need to increase the stock of market housing within the District, with an established need for smaller dwellings in north Wealden and family homes in south Wealden.’ (Our emphasis).

- 2.7 The Affordable Housing Local Plan (2016) reiterates these points, adding a new local plan objective which seeks:

‘To help meet affordable housing needs of the District by securing and delivering a significant proportion of affordable housing from developments with market housing, whilst ensuring the overall viability of the development is not prejudiced and that a mix of tenure is provided that meets the needs of the local area and creates balanced communities.’

Status of the Wealden District Local Plan Core Strategy (Adopted 2013)

- 2.8 The WDC Local Plan Core Strategy was adopted in 2013, with a plan period of 2006 – 2027.
- 2.9 As the Wealden District Local Plan was adopted in February 2013 it is consequently now more than five years old. Therefore, the development policies contained within the Local Plan are out of date, and as such trigger Paragraph 11d of the NPPF (the tilted balance) where decision-taking is made on the presumption of sustainable development, unless doing so would cause adverse impacts that demonstrably outweigh the benefits when assessed against the NPPF as a whole.
- 2.10 The National Planning Policy Framework (NPPF, 2023) states¹ that where a local plan is more than five years old, housing supply should be calculated using the Standard Method (Standard Methodology Local Housing Need (SM LHN)), and housing supply should be demonstrated against local housing need.² Current housing need is set out in the WDC 5YHLS Statement (Dec ’23).

Policy in the Wealden District Local Plan Core Strategy (Adopted 2013)

- 2.11 Policy WCS1 Provision of Homes and Jobs 2006 - 2027 identifies that the plan will allocate land, to enable the provision of some 4,525 ‘net additional’ dwellings in Wealden District to provide for 9,440 dwellings over the period 2006 - 2027. As the policy is more than five years old, the delivery quantum is updated via the Standard Method calculation set out in the WDC 5YHLS Statement.
- 2.12 Policy WCS2 Distribution of Housing Growth 2006 - 2027 establishes the spatial strategy for the delivery of the identified housing requirement. It establishes a settlement hierarchy which it utilises to set out the distribution of development in the Borough and allocates development quantum by Town/Settlement. Hailsham / Hellingly is identified in this policy and is allocated to deliver 2,945 homes over the Plan period.

¹ Department for Levelling Up, Housing & Communities, *NPPF 2023, paragraphs 76, 77 & footnote 42*, <https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf> [accessed Feb 2024]

² Ibid., paragraph 77

- 2.13 The 2013 Core Strategy retains some saved policies from the Wealden Local Plan (1998), but they are not relevant to affordable housing as affordable housing policies are updated by the Affordable Housing Delivery Local Plan in 2016.

Housing Delivery Test

- 2.14 The Housing Delivery Test (HDT) is an annual measurement of housing delivery against housing need, within a local authority. Where the HDT is 85% or more, there is no need to add a buffer to the requirement. However, where the HDT is less than 85% the authority is required to demonstrate a sufficient HLS, and a 20% buffer must be added to the requirement.³
- 2.15 The predicted substantial level of under supply in WDC over the next five years (3.83 years, representing a shortfall of 1,687 homes) is underscored by significant levels of previous under provision. The HDT has not been met in full in Wealden since 2018, and provision against target is generally decreasing, as illustrated below.
- 2022 - 78% - buffer and action plan required
 - 2021 - 82% - buffer and action plan required
 - 2020 - 83% - buffer and action plan required
 - 2019 - 83% - buffer and action plan required
 - 2018 - 112% - no action required

Hellingly Neighbourhood Plan 2018 - 2028 (June 2021)

- 2.16 The Hellingly Neighbourhood Plan 2018 – 2028 was formally made by Full Council in July 2021. Policy *HNDP7 – Housing Type*, specifies that proposals that provide for a high percentage of homes for the elderly and starter homes/shared ownership (2-3 bed or smaller) will be supported. There is no additional policy in the Neighbourhood Plan on the amount of affordable housing to be delivered.

Affordable Housing Delivery Local Plan (May 2016)

- 2.17 The Wealden District Affordable Housing Delivery Local Plan was adopted in May 2016, following examination by an independent planning inspector. It therefore constitutes the most recently adopted policy in the district.
- 2.18 The purpose of the Plan is to update adopted Core Strategy Policy WCS8, by superseding it with policy *AFH1: Affordable Housing*.
- 2.19 The 2016 Plan is based on the 2010 Housing Needs Assessment, which identifies an annual affordable housing need of 812 affordable dwellings per annum.⁴ *Policy AFH1: Affordable Housing* stipulates that new housing developments must make the most

³ Ibid., paragraph 77, footnote 43

⁴ Fordham Research, Wealden District Council Housing Needs Assessment January 2010 paragraph S13 <https://www.wealden.gov.uk/UploadedFiles/xl9b_Housing_Needs_Report.pdf>, [accessed Feb 2024]

effective use of the land, taking into account the character of the local area. The Plan explains that;

‘Even when re-lets and alternative mechanisms of meeting housing need are taken into account, this figure is substantial and highlights the importance of delivering the maximum number of affordable dwellings from new housing growth that will take place within the District.’

- 2.20 The 2016 policy also stipulates that development of 5 or more (net) dwellings must provide 35% of all housing on site as affordable housing, with specific tenure provisions set out, based on the total quantum of dwellings proposed. On development sites of 50 dwellings (net) or more, around 40% of the total number of affordable homes provided should be for social rented accommodation, 40% for affordable rent and 20% intermediate accommodation. Affordable housing should be delivered on site, however in exceptional circumstances a commuted payment may be accepted in lieu of on-site provision.
- 2.21 Parts of these policies have since been updated by national policy. Site size minimum threshold was updated to ten homes in the NPPF (2018) and First Homes were introduced as a priority affordable housing tenure in a Ministerial Statement (24 May 2021). The NPPF amendment confirms that the appropriate site size threshold, outside of the AONB, to trigger an affordable housing requirement is ten units. First Homes were introduced as a priority affordable housing tenure, making first call on 25% of the affordable housing, with social rented housing retaining its original proportion (40%) and the remaining 35% being split on the proportional balance advocated in policy (40:20). This results in a requirement for 23% affordable rent and 12% intermediate.

Affordable housing quantum and tenure

- 2.22 The Appeal Scheme would deliver up to 124 new homes, including 5% made available as self or custom build and 35% affordable housing provision, equating to a total of 43 affordable homes (based on a 124 homes capacity, in compliance with the Wealden Housing services’ response to the planning application). Percentage targets for the affordable housing tenure split are as detailed below.

	Social Rented	Affordable Rent	Shared Ownership	First Homes	Total
Dwelling Percentage (units)	40% (17)	23% (10)	12% (5)	25% (11)	100% (43)

Table 1: Appeal scheme housing tenure

- 2.23 The affordable housing tenure split, as set out above, includes c.25% First Homes, 63% Rented and the remaining 12% Shared Ownership, in line with the guidance set out in the relevant policy, and the NPPF (2023).

Proposed affordable housing contribution

- 2.24 The affordable housing commitments included in the Appeal Scheme, to be secured via the Section 106 Agreement, are fully compliant with the affordable housing policies in the Wealden Local Plan. The on-site delivery of affordable homes accords with the

latest affordable housing policy (2016) on quantum and tenure and the unit mix is as guided by local need by WDC, for optimum local benefit.

- 2.25 Affordable housing delivery on the Appeal Site would make a significant contribution towards addressing local affordable housing need, providing up to 43 affordable homes for local people otherwise unable to access housing in the open market. This is particularly important in addressing local policy priorities, where it is acknowledged that there are acute housing affordability issues in the district.

3 Affordable housing need, delivery and supply in Wealden District

- 3.1 This section of the note examines affordable housing need, past affordable housing delivery and future anticipated affordable housing supply. Scrutiny of past delivery and future potential supply facilitates a comprehensive assessment of WDC's ability to facilitate a sufficient supply of affordable housing to address need.

Methodology

- 3.2 Prior to proceeding with the following analysis, it should be noted that there are two commonly used methods for factoring in delivery backlog, to future need. One, known as the 'Liverpool Approach', takes any backlog of delivery at the time of assessment and spreads it over the remaining years of the plan period. It is therefore a more generous way of factoring in the backlog, typically allowing the target to address the existing backlog to be spread over a considerably longer period of time.
- 3.3 The second, known as the 'Sedgefield Approach', is where existing backlog of delivery at the time of assessment is spread over the upcoming five years (the same time period as the 5YHLS calculation). The Sedgefield Approach is more appropriate for the assessment of affordable housing need within a Plan period as it creates a more pressing target to deal with an already legacy issue.
- 3.4 The Sedgefield Approach is specifically the more appropriate approach for this as the need for affordable housing is more acute. Affordable housing residents have no control and little choice over the allocation of affordable homes and may be in particularly vulnerable circumstances.
- 3.5 The use of the Sedgefield Approach in these circumstances is supported by the Planning Practice Guidance (PPG). In response to the question '*how can past shortfalls in housing completions against planned requirements be addressed?*', the PPG states, inter alia, that;

'...Under delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing'⁵

Further, that;

*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**), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination*

⁵ Planning Practice Guidance, Paragraph: 031 Reference ID: 68-031-20190722, Revision date: 22 July 2019, <<https://www.gov.uk/guidance/housing-supply-and-delivery>> [accessed 22 Feb 2024]

process rather than on a case by case basis on appeal.’ (Our Emphasis).

3.6 Applying the principles of this guidance to the current situation means;

1. Affordable housing backlog during the Plan period should be dealt with via the Sedgefield Approach;
2. Past under delivery of affordable housing within the Plan period, as identified in the mid-Plan Strategic Housing Market Assessment (SHMA) / Housing Needs Assessment (HNA), should be dealt with in accordance with the Sedgefield Approach;
3. The positions on affordable housing need in the 2016 SHMA and 2021 Local Housing Needs Assessment (LHNA) do not yet form part of the scrutinised evidence base for plan making as no Local Plan has been examined since the production of the evidence bases (see §3.16). These assessments dissipate existing affordable housing need over the lifetime of the studies, thereby under-representing affordable housing need over the upcoming five year period.
4. The last scrutinised assessment of affordable housing need is the 2010 HNA, which formed the evidence base for the Affordable Housing Local Plan, adopted in 2016. This states an affordable housing need of 812 homes per annum.

3.7 Correspondingly, this report uses the Sedgefield Approach to factor in existing backlog of affordable housing delivery within the Plan period, to spread it over the upcoming five year supply period.

Total Housing Need

3.8 To accurately understand the weight of affordable housing need, it is important to consider the total housing need context within a district. Detailed information for Wealden is included within the Appellant’s Five Year Housing Land Supply Proof of Evidence, however for ease of reference a short summary is set out below.

3.9 Policy WCS1 Provision of Homes and Jobs 2006 - 2027 identifies that the Plan will allocate land to enable the provision of some 4,525 ‘net additional’ dwellings in Wealden District to provide for 9,440 dwellings over the period 2006 - 2027. It is worth noting that whilst the contemporaneous need over the Plan period from the time of the adoption of the Plan (450 dpa) equates to 9,450 dwellings [450 * 21], this quantum is now well below the number of homes needed to meet the district’s total housing requirement over the entire plan period (using the revised housing requirements, as per the NPPF) which is currently 17,286 dwellings, as set out in Table 3 below.

3.10 The ‘net additional’ quantum identified in the Plan includes for meeting the affordable housing need of the District over the Plan period. In accordance with Paragraph 74 of the NPPF, the assessment of local housing need has been periodically updated during the Plan, using the government’s Standard Method. It is currently as reported in WDC’s latest 5 Year Housing Land Supply (5YHLS) Statement, published in December 2023. This is the most up to date source of information.

Year	Total Housing Requirement (need)
2006/07	450
2007/08	450

2008/09	450
2009/10	450
2010/11	450
2011/12	450
2012/13	450
2013/14	450
2014/15	450
2015/16	735
2016/17	946
2017/18	950
2018/19	950
2019/20	1,231
2020/21	1,212
2021/22	1,212
2022/23	1,200
2023/24	1,200
2024/25	1,200
2025/26	1,200
2026/27	1,200
Total	[17,286]

Table 3: Housing requirement over the Plan period 2006 - 2027

- 3.11 As set out in Section 2 of this note, the latest HLSS (base dated April 2023, published December 2023) identifies a shortfall of housing supply in the immediate five year period. The Standard method 5 year supply requirement of 7,200 homes is not met, and the anticipated deliverable supply is 5,513 homes; this equates to a HLS position of 3.83 years. This represents a reduction relative to the previous HLS position of 1st April 2022, which identified a HLS of 3.92 years, as referenced by officers in the delegated report for the appealed application.
- 3.12 The Appellant's technical team has reviewed the 5YHLS as published by WDC in the latest supply statement (CD10.1), full details of which are in the 5YHLS Proof of Evidence. The Appellant's position is that the 5YHLS situation in WDC is 4,526 homes, equivalent to 3.14 years' housing supply. This represents a reduction of 987 homes over the five year period.
- 3.13 For the purposes of this Appeal, WDC have indicated that they are willing to agree a range of delivery. The top end of the range is 3.83 years, whilst the Appellant's position is 3.14 years, which is yet to be agreed. This is equivalent to a shortfall of between -1,687 and -2,674 homes over the five year period.
- 3.14 It is not unreasonable to anticipate that this shortfall in supply will persist at least in the short to medium term, due to the ongoing lack of a spatial framework which would enable the currently arising need to be met. On 8 February 2024, WDC resolved to publish a Reg 18 Local Plan. The Local Development Scheme estimates a timeframe for the adoption of the emerging Local Plan as Q1 2026/'27. Add to this the relevant time to submit a planning application, secure planning consent, discharge conditions, deliver development and facilitate occupation to estimate the delivery of new housing as a result of a new Plan.
- 3.15 Additionally, it is noted that although the Reg 18 Consultation Plan included site allocations for consultation, it does not include sufficient residential sites to meet identified demand, and as a result WDC has begun a further Call for Sites process (on

15 March 2024), which may extend the wait until a suitable, adopted spatial framework will be in place.

- 3.16 This adds weight to the benefits of the Appeal Scheme in respect of the potential to deliver housing and affordable housing in a timely manner, as additions to the identified supply.

Affordable housing need

- 3.17 As set out above, the WDC Local Plan Core Strategy was adopted in 2013, with a plan period of 2006 – 2027. There are three relevant assessments which advise on both affordable and total housing need in Wealden District, which are:

- The 2010 WDC Housing Needs Assessment
- The 2016 WDC Strategic Housing Needs Assessment
- The 2021 Wealden Local Housing Needs Assessment

- 3.18 These assessments all set different quantum of affordable and total housing need for their respective periods; the relevant quantum are included within Table 4 below.

- 3.19 It should be noted that the 2010 Housing Needs Assessment is the last dataset that has been scrutinised as part of an independently examined policy: the 2016 Affordable Housing Local Plan, which was reviewed by an inspector during the Local Plan examination.

	Affordable Need	Total Housing Need
2010 WDC Housing Needs Assessment	812	1,215
2016 WDC Strategic Housing Market Assessment	331	736
2021 Wealden Local Housing Needs Assessment (CD10.9)	854	1,225

Table 4: Identified affordable, and total housing need over the course of the Plan period, from relevant assessments

- 3.20 Analysis within the 2016 SHMA makes clear that it deviates in methodology from previous assessments for certain elements of the affordable housing assessment and relies upon information provided by the Council in some areas, where in other circumstances wider data sources would have been relied upon.
- 3.21 The most recent housing need evidence is produced in the Wealden Local Housing Needs Assessment published in August 2021 which assesses affordable housing need for the 2019 – 2039 period. It states a combined affordable housing need of 854 homes per annum, split as 519 for rent and 335 affordable home ownership.
- 3.22 This assessment is notably much closer to the 2010 HNA affordable housing need quantum (812 homes per annum), than it is the 2016 SHMA assessment of an annual affordable housing need of 331 homes.
- 3.23 Housing need from the contemporaneous SHMA/HNAs has been used to compare against respective delivery years in this report, but it is noted that this may understate affordable housing need, and therefore the actual affordable housing delivery deficit.

- 3.24 To cross check the assumption that there remains significant need for affordable housing, it is reasonable to check whether there is unmet demand for affordable housing by checking the number of households on the local Housing Register. The 2022 - 2023 Local Authority Housing Statistics returned to government⁶ (published November 2023) states that the number of households on the WDC Housing Register is 743. This is sizeable demand.
- 3.25 The WDC response to the Freedom of Information request (**Appendix Two**) states that, as of April 2023, there are 743 households on WDC's Housing Register; this is the most up to date position available. Further data from the WDC Housing Register is considered in section 4 below.
- 3.26 As set out above, the Wealden Local Housing Needs Assessment published in August 2021 identifies the net annual affordable housing need in Wealden District is 854 affordable homes. To meet this through the application of the 35% affordable housing requirement contained in the adopted policy *AFH1*, the total housing supply required per annum would be c. 2,440 homes. However, the WDC 2023 5YHLS Assessment states that the total local housing requirement (including buffer) is 1,440 dwellings per annum (7200/5).
- 3.27 If the adopted affordable housing policy of 35% were met on the reported 5YHLS average annual supply ($5,315/5 = 1,063$ dwellings), the approximate policy compliant affordable housing supply would be 372 homes per annum ($1,063 * 35\%$). This is significantly (482) short of meeting the identified annual affordable housing need (854).
- 3.28 Consequently, even if the local policy *AFH1* affordable housing target of 35% across all delivery is reached, this would not yield sufficient affordable housing delivery to appropriately address need.
- 3.29 Schemes that independently meet the affordable housing policy requirement therefore offer a significant benefit in their delivery.
- 3.30 It is agreed common ground that there is an acute need for affordable housing delivery (CD13.8).

Historic affordable housing delivery

- 3.31 The annual performance on affordable housing delivery is reported in WDC's Annual Monitoring Reports, as referenced below. Table 5 below details affordable housing delivery in the district since 2013 (the adoption of the Plan).

	Total housing completions (net)	Affordable housing completions	Affordable housing as a percentage of all housing
April 2013 – March 2014	560	201	36%
April 2014 – March 2015	576	193	34%
April 2015 – March 2016	520	82	16%
April 2016 – March 2017	564	81	14%

⁶ Department for Levelling Up, Housing and Communities, *Local authority housing statistics data returns for 2022 to 2023*, <<https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2022-to-2023>> [accessed Feb 2024]

April 2017 – March 2018	462	144	31%
April 2018 – March 2019	828	130	16%
April 2019 – March 2020	1,034	273	26%
April 2020 – March 2021	722	275	38%
April 2021 – March 2022	685	176	26%
April 2022 – March 2023	1,138	218	19%
TOTAL	7,089	1,773	25%

Table 5: Affordable housing delivery 2013 - '14 to 2022 - '23

- 3.32 Since 2013 – 2014, the average affordable housing delivery of 177 homes per annum, as a proportion of overall housing delivery constitutes 25%. This is below the 35% affordable housing target sought by policy *AFH1: Affordable Housing*, and incidentally, is below the ‘*general 30%*’ target set out in the supporting text for policy HG2 of the 1998 Wealden Local Plan, which formed the target prior to the adoption of the current core strategy in 2013.
- 3.33 Again, it is of note that a district wide quantum of affordable housing delivery that meets the local *AFH1: Affordable Housing* policy target of 35% affordable housing would still not deliver sufficient affordable housing to fully address local affordable housing need.

Losses to social housing stock

- 3.34 The Right to Buy (RtB) and associated Right to Acquire (RtA) schemes affect the net provision of affordable housing stock. Right to Buy allows residents to purchase their home from a Council. The Right to Acquire is similar but allows residents to buy their affordable home from an Affordable Housing Provider (AHP). Both schemes result in a net loss to the local affordable housing stock.
- 3.35 The guidance provided for the schemes suggests that any dwelling sold under RtB/RtA should be replaced on a one-for-one basis. However, in reality this is rarely the case.
- 3.36 The government publishes data related to the sale of dwellings transacted through the RtB and RtA schemes. WDC owns the majority of the social housing stock in the district, and there is also a notable amount of stock that is owned by Affordable Housing Providers. As such, there will be two sources of potential social housing stock losses, through both programmes.
- 3.37 All losses from RtB and RtA are recorded by central Government. RtB losses are recorded and published via Live Table no. 691⁷ and RtA losses are recorded and published under National Statistics “data release” returns⁸. When aggregated per year, the result is the following loss to the local affordable housing stock, shown in Table 6 below.

⁷ Department for Levelling Up, Housing and Communities, *Live tables on social housing sales* <<https://www.gov.uk/government/statistical-data-sets/live-tables-on-social-housing-sales>> [accessed 21 February 2024]

⁸ Regulator of Social Housing, *Private Registered Provider social housing stock in England*, <<https://www.gov.uk/government/collections/private-registered-provider-social-housing-stock-in-england>> [accessed 21 February 2024]

	Total housing completions (net)	Affordable housing completions	RtB losses	RtA losses	Affordable housing completions (net, after acquisitions)	Net affordable housing as a percentage of all housing
April 2013 – March 2014	560	201	22	0	179	31.9%
April 2014 – March 2015	576	193	14	0	179	31%
April 2015 – March 2016	520	82	21	0	61	11.7%
April 2016 – March 2017	564	81	19	3	59	10.4%
April 2017 – March 2018	462	144	21	0	123	26.6%
April 2018 – March 2019	828	130	15	0	115	13.8%
April 2019 – March 2020	1,034	273	18	0	255	24.6%
April 2020 – March 2021	722	275	9	0	266	36.8%
April 2021 – March 2022	685	176	12	1	163	23.7%
April 2022 – March 2023	1,138	218	19	0	199	15.1%
TOTAL	7,089	1,773	170	4	1,599	22.5%

Table 6: Net affordable housing delivery 2013 - 2014 to 2022 - 2023

- 3.38 170 homes have been lost from the affordable housing stock through the Right to Buy scheme in the district in the period from April 2013 to March 2023. An additional 4 homes have been lost from the stock through the Right to Acquire scheme from April 2013 to March 2023. This equates to a total loss of 174 homes from the affordable housing stock, over the period since 2013.
- 3.39 The table above shows that there has been a steady, notable loss of affordable homes since 2013. This loss should be subtracted from the annual affordable housing delivery quantum, to provide a total net affordable housing quantum available.
- 3.40 By subtracting the affordable housing stock losses to 2023 (174) from affordable housing completions (1,773), it is demonstrated that the average net affordable housing delivery (1,599 homes) over the ten year period is equivalent to 160 homes per annum (1,599/10).
- 3.41 Therefore, the average net affordable housing delivery over the 10-year period to 2023 is equivalent to 160 homes per annum.

Comparing affordable housing need with past affordable housing delivery

- 3.42 Affordable housing need is as determined by a local SHMA or equivalent and can be updated throughout a plan period. Despite the last two affordable housing need assessments (2016 and 2021) not yet forming part of the evidence base of a local, adopted development plan, their evidence is referenced below.
- 3.43 When a SHMA is produced as part of an evidence base to underpin a Local Plan, it is expected that a conversation would take place between the author of the study and the commissioning authority to determine the appropriate treatment of existing backlog of affordable housing need. It is often deemed appropriate at the start of a Plan period to dissipate a backlog of existing need over the study period, typically 20 years, instead of addressing it in the upcoming five year period.
- 3.44 Use of the affordable housing need calculated the 2016 and 2021 SHMA/HNA assessments may therefore underrepresent current affordable housing need, as the

existing backlog is dissipated over the remainder of the study period in each case. The PPG is clear that assessments undertaken *within* a Plan period, should factor in existing backlog using the Sedgefield Approach.

- 3.45 The tables below show net affordable housing delivery for the respective years, having taken the appropriate deduction for stock losses experienced under the RtB / RtA schemes, detailed in Table 6 above. The average net annual delivery rate over the ten year period is 160 homes per annum.
- 3.46 The WDC SHMA 2016 cites an annual affordable housing need of 331 homes, applicable in delivery years 2013 – 2018.
- 3.47 In Table 7 below, the calculated net affordable housing delivery (as set out in Table 6 above) from April 2013 – March 2018 is assessed against the housing need identified in the 2016 SHMA. Any cumulative surplus or shortfall in delivery is then calculated and shown in the final column.

	Affordable Housing Completions	2016 SHMA Affordable Housing Need (net)	Annual shortfall / surplus in Affordable Housing Delivery (net)	Cumulative shortfall / surplus in Affordable Housing Delivery (net)
April 2013 – March 2014	179	331	-152	-152
April 2014 – March 2015	179	331	-152	-304
April 2015 – March 2016	61	331	-270	-574
April 2016 – March 2017	59	331	-272	-846
April 2017 – March 2018	123	331	-208	-1,054
TOTAL	601	4,060		-1,054

Table 7: Affordable housing need and delivery April 2013 – March 2018

- 3.48 Table 7 above shows a shortfall in affordable housing delivery of -1,054 homes over a five year period to March 2018.
- 3.49 Housing need evidence is updated in 2021 by a Wealden Local HNA, applicable for the 2019 – 2039 delivery period. It states a combined affordable housing need of 854 homes per annum, split as 519 for rent and 335 affordable home ownership.
- 3.50 When backlog of affordable housing need is considered in the 2021 HNA, it is not clear whether the full backlog incurred through the Plan period to 2019 is fully addressed or otherwise. However, as the affordable housing need assessment has been updated, it should be assumed that the 1,054 affordable home backlog to 2018 has been accounted for in the new need analysis at 854 affordable homes. Irrespective of whether the full backlog is accounted for or not, the backlog identified is dissipated across a 20 year period.
- 3.51 As the PPG advises that unmet housing need during a plan period should be accounted for in the upcoming five years, if the 1,143 home existing need identified in the 2021 HNA⁹ is redistributed over the upcoming five year period, rather than the next twenty years, the rented affordable housing need would increase from 519, to 748. Total

⁹ Iceni, *Wealden Local Housing Needs Assessment, August 2021*, §7.44
<<https://www.wealden.gov.uk/UploadedFiles/Wealden-Local-Housing-Needs-Assessment.pdf>> [accessed 28 Feb 2024]

affordable housing need would then extend to 1,083 homes per annum, or 5,415 homes over the subsequent five year period.

- 3.52 For the purposes of the current assessment, the annual affordable housing need of 854 homes (2021 HNA) has been maintained.

	Affordable Housing Completions	2021 HNA Affordable Housing Need (net)	Annual shortfall / surplus in Affordable Housing Delivery (net)	Cumulative shortfall / surplus in Affordable Housing Delivery (net)
April 2018 – March 2019	115	854	-739	-739
April 2019 – March 2020	255	854	-599	-1,338
April 2020 – March 2021	266	854	-588	-1,926
April 2021 – March 2022	163	854	-691	-2,617
April 2022 – March 2023	199	854	-655	-3,272
TOTAL	998	4,270		-3,272

Table 8: Affordable housing need and delivery April 2018 – March 2023

- 3.53 It is of note that the cumulative shortfall in affordable housing delivery from 2018 – 2023 (already incorporating the 2013 – 2018 backlog into need) is -3,272 homes, relative to the five year affordable housing need of 4,270 homes. This shows a significant unmet affordable housing need for the preceding five years of the Plan.
- 3.54 If this deficit is distributed equally over the five year period it averages a delivery deficit of 654 affordable homes per annum, or c. 77% of annual affordable housing need. In terms of households, this means that since April 2018, 998 households have been given access to affordable housing locally, and up to 3,272 may remain in need.
- 3.55 The above takes an optimistic view of housing need and identifies what is likely to be a minimum cumulative shortfall position. Had the existing affordable housing need in the 2021 HNA been dissipated over a five year period in accordance with the Sedgefield Approach (§3.5), the deficit would be in the order of -4,417 affordable homes (998 – 5,415).

Future affordable housing need

- 3.56 The 2021 HNA identifies an affordable housing need of 854 affordable homes per annum for the 2019 – 2039 delivery period. Over this 20-year period, the total affordable housing need is therefore 17,080 homes.
- 3.57 Since April 2018, there have been 998 net affordable homes delivered, against a need for 4,270 new affordable homes, thereby resulting in a shortfall of 3,272 affordable homes to the end of March 2023 (the last AMR data available).
- 3.58 When, in accordance with the Sedgefield Approach, the current backlog of 3,272 homes is accommodated in the next 5 years of the WDC Local Plan (2023/24 – 2027/28), the requirement would increase by 654 homes per annum (3,272 / 5), from 854 homes per annum, to 1,508 homes per annum.

- 3.59 From 2028 to the end of the plan period (2031), the affordable housing need/requirement would then fall back to 854 homes per annum, as identified in the HNA.

Delivery timescale	2021 HNA Affordable Housing Need	Revised need, incorporating backlog to 2028
April 2023 – March 2024	854	1,508
April 2024 – March 2025	854	1,508
April 2025 – March 2026	854	1,508
April 2026 – March 2027	854	1,508
April 2027 – March 2028	854	1,508
April 2028 – March 2029	854	854
April 2029 – March 2030	854	854
April 2030 – March 2031	854	854
TOTAL	6,832	10,102

Table 9: Updated affordable housing need to 2030-'31

- 3.60 It can therefore be seen that a significant uplift in annual affordable housing delivery is required to meet the current backlog of need and ensure that every household in the district could have a suitable home that they could afford. In the context of this accumulated shortfall, proposing a policy compliant amount of affordable housing over the next five years is clearly a substantial benefit of the Appeal Scheme.

Potential future total housing supply

- 3.61 For the purposes of this Appeal, WDC have indicated that they are willing to agree a range of delivery. The top end of the range is 3.83 years, whilst the Appellant's position is 3.14 years, which is yet to be agreed. This is equivalent to a shortfall of between -1,687 and -2,674 homes over the five year period.
- 3.62 The WDC anticipated total housing supply as identified in the HLS Statement is summarised as follows;

Housing Requirement and Supply for period between 1 April 2023 and 31 March 2028		
A	Five Year Housing Requirement	6,000 (net) dwellings
B	20% buffer (20% of 6,000)	1,200
C (A + B)	Five Year Housing Requirement including buffer	7,200 (net) dwellings
D	Total Housing Land Supply (Projected Net Housing Completions)	8,132 (net) dwellings
E	Five Year Housing Land Supply (Projected Net Housing Completions)	5,513 (net) dwellings
F (C – D)	Projected Completions above/below requirement	-1,687
G	Five Year Housing Land Supply against Requirement	3.83 years (or 76.6%)

Table 10: WDC 5 year housing land supply position 1 April 2023 – 31 March 2028

Row 'E' Source	Number of dwellings 23/24 – 27/28
1. Housing Developments with planning permission (Small Sites)	690

2. Housing Developments with detailed Planning permission (Major Sites)	2,662
3. Housing Developments with Outline Planning permission or Resolution to Grant (Major Sites)	2,083
4. Projected Delivery/Loss of Use Class C2 Accommodation with Detailed or Outline Planning Permission	78
TOTAL	5,513

Table 11: Breakdown of 5YHLS origins

- 3.63 It should be noted at this point that it is agreed common ground, and is set out in the 5YHLS statement that WDC does not have a 5YHLS, so it should be anticipated that housing need for any tenure, including market housing, is not met.

The potential affordable housing supply: Wealden District Council position

- 3.64 Future affordable housing supply is largely derived from large existing sites with planning permission.
- 3.65 Sites delivering fewer than 10 homes (Row 1) fall below the affordable housing requirement threshold (NPPF 2023). Consequently, it is assumed that Row 1 sites do not generate any net affordable housing provision.
- 3.66 Additionally, as Use Class C2 Accommodation (Row 4) does not trigger the requirement to provide affordable housing in the Plan, these sites are removed from the affordable housing generating supply, reducing the total affordable housing generating supply to 4,745, as shown in Table 12 below.

Row 'E' Source (Rows 1 & 4 removed)	Number of dwellings 23/24 – 27/28
~~1. Housing Developments with planning permission (Small Sites)~~	~~690~~
2. Housing Developments with detailed Planning permission (Major Sites)	2,662
3. Housing Developments with Outline Planning permission or Resolution to Grant (Major Sites)	2,083
~~4. Projected Delivery/Loss of Use Class C2 Accommodation with Detailed or Outline Planning Permission~~	~~78~~
TOTAL	4,745

Table 12: Breakdown of 5YHLS origins, excluding non-affordable housing generating provision

- 3.67 If a policy compliant amount of 35% affordable housing came forward over the five year period, based on the total applicable quantum of 4,745 homes, this would amount to 1,661 affordable homes, or 332 dwellings per annum.

The potential affordable housing supply: Appellant's position

- 3.68 The Appellant's technical team has reviewed the 5YHLS as published by WDC in the latest supply statement (CD10.1), full details of which are in the 5YHLS Proof of Evidence.
- 3.69 The Appellant's position is that the 5YHLS situation in WDC is 4,526 homes, equivalent to 3.14 years housing supply. This equates to a reduction of 987 homes over the five year period and affects the 'supply source' as set out in Table 13 below.

Supply Source	WDC Position: Number of dwellings '23/'24 – '27/'28	Appellant Position: Number of dwellings '23/'24 – '27/'28
1. Housing Developments with planning permission (Small Sites)	690	642
2. Housing Developments with detailed Planning permission (Major Sites)	2,662	2,389
3. Housing Developments with Outline Planning permission or Resolution to Grant (Major Sites)	2,083	1,417
4. Projected Delivery/Loss of Use Class C2 Accommodation with Detailed or Outline Planning Permission	78	78
TOTAL	5,513	4,526

Table 13: Breakdown of 5YHLS sources: WBC and Appellant positions

- 3.70 Taking the Appellant's assessment generating 4,526 homes of total 5YHLS as the baseline, the amount of affordable housing generating supply is then calculated, using the same method as set out in paragraphs 3.65 and 3.66 above, as detailed below.

Appellants 5YHLS: Row 'E' Source (Row's 1 & 4 removed)	Number of dwellings 23/24 – 27/28
~~1. Housing Developments with planning permission (Small Sites)~~	~~642~~
2. Housing Developments with detailed Planning permission (Major Sites)	2,389
3. Housing Developments with Outline Planning permission or Resolution to Grant (Major Sites)	1,417
~~4. Projected Delivery/Loss of Use Class C2 Accommodation with Detailed or Outline Planning Permission~~	~~78~~
TOTAL	3,806

Table 14: Breakdown of Appellants 5YHLS origins

- 3.71 The method for assessing the affordable housing supply generated is the same when using the WDC 5YHLS as baseline and the Appellant's 5YHLS position as baseline.
- 3.72 If a policy compliant amount of 35% affordable housing came forward over the five year period, based on the total applicable quantum of 3,806 homes, this would amount to 1,332 affordable homes, or 266 dwellings per annum.

Balance between affordable housing need and supply

- 3.73 As set out in paragraph 3.32 above, the average net affordable housing delivery over the Plan period to date is equivalent to 160 affordable homes per annum. If this trend were to continue for the upcoming five years instead, an estimated 800 affordable homes total, would come forward over the 5YHLS period to 2028 (160 * 5).
- 3.74 It would not be unreasonable to hypothesise potential future affordable housing supply at a rate of 160 dwellings per annum (paragraph 3.32), as this represents the average delivery that has been brought forward across the district during the Plan period.
- 3.75 In contrast, both the total potential supply of 332 affordable homes per annum (a policy compliant 35% of 4,745 homes) identified using the WDC 5YHLS, or 266 affordable homes per annum (a policy compliant 35% of 3,806 homes) identified using the Appellant's 5YHLS position, would represent a very optimistic upturn in affordable housing supply rates over the upcoming five year period.

- 3.76 The total future affordable housing supply for Wealden District as a proportion of the 2021 HNA affordable housing need is illustrated in the table below.

		WDC 5YHLS	Appellant 5YHLS
A	Total supply of affordable dwellings for April 2023 – March 2028	1,661	1,332
B	Five-year affordable housing need on 2021 HNA (854 dpa)	4,270	4,270
C	Shortfall (A-B)	-2,609	-2,938

Table 15: Potential affordable housing supply compared with 2021 HNA affordable housing need

- 3.77 When disregarding the backlog entirely (Table 15), there is a considerable shortfall between the potential total supply of affordable dwellings for April 2023 – March 2028 (generated by applying 35% policy compliant quantum to the forecast supply) and the five-year affordable housing need. This 'new' shortfall (-2,609 to -2,938 homes) represents households who are in acute need of housing and demonstrates that a significant uplift in annual affordable housing provision is required, now, to facilitate more families in the district being able to have a permanent home.
- 3.78 When the current backlog of affordable housing delivery is used to update the future five year housing need quantum using the Sedgefield Approach, the 2021 HNA quantum of 854 dwellings per annum, increases to 1,508 dwellings per annum, totalling 7,540 homes over five years, as set out in Table 9 above.
- 3.79 On that basis, the shortfall in affordable housing supply as set out below in Table 16, is a substantial -5,879 to -6,208 homes, or up to 82% of affordable housing need not being met.

		WDC 5YHLS	Appellant 5YHLS
A	Total supply of affordable dwellings for April 2023 – March 2028	1,661	1,332
B	Five-year affordable housing need including current backlog (Sedgefield Approach) 2021 HNA (1,508 dpa)	7,540	7,540
C	Shortfall (A-B)	-5,879	-6,208

Table 16: Potential affordable housing supply compared with 2021 HNA affordable housing need, including current backlog

- 3.80 All of the backlog calculations above demonstrate that the five year potential supply pipeline of affordable housing will result in significant local under delivery of affordable housing, and an inability of WDC to facilitate sufficient affordable housing supply to either those in newly arising housing need, or those who already occupy positions on the Housing Register.
- 3.81 This will commensurately increase the housing backlog and increase waiting times experienced on the Housing Register.

Summary of future affordable housing need and potential supply

- 3.82 WDC current affordable housing need as determined by the 2021 HNA is 854 dwellings per annum.

- 3.83 When the current affordable housing delivery backlog (3,272 dwellings) is addressed using the Sedgefield Approach, and added to ongoing annual need, the affordable need rises to 1,508 dwellings per annum for the upcoming five year period, before falling back down to 854 for the remainder of the Plan period. This equates to a need for 10,102 total affordable dwellings up to 2031. Over the next five years, this equates to a need for 7,540 dwellings.

Potential affordable housing supply: WDC Position

- 3.84 The potential affordable housing supply for the next five years will arise largely via large existing sites with planning permission. If a policy compliant amount of 35% affordable housing came forward over the five year period, based on the total applicable quantum of 4,745 homes (Table 12), this would amount to 1,661 affordable homes, or 332 dwellings per annum.
- 3.85 At a potential supply total of 1,661 affordable homes, this would meet approximately 22% of need, but more critically, when existing backlog is considered, will leave 5,879 households who qualify for affordable housing, without an affordable home.

Potential affordable housing supply: The Appellant's Position

- 3.86 As set out at paragraph 3.76, the Appellant's technical team has reviewed WDC's 5YHLS and concluded that the deliverable supply in WDC is 4,526 homes, equivalent to 3.14 years' housing supply. This equates to a reduction of 987 homes within the five year period. Removing the supply categories that do not yield affordable housing results in a revised base position of 3,806 total applicable dwellings coming forward over the five year period.
- 3.87 If a policy compliant quantum of 35% affordable housing came forward over the five year period, based on the total applicable quantum of 3,806 homes, this would amount to 1,332 affordable homes, or 266 dwellings per annum.
- 3.88 These 1,332 homes would only meet c.18% of affordable need, and significantly, would leave 6,208 households who qualify for affordable housing, without an affordable home.

Conclusion

- 3.89 WDC cannot demonstrate a 5 year housing land supply (3.14 - 3.83 years), have no 'in date' adopted Local Plan, the HDT has not been met in full in the district since 2018, (and results are getting progressively worse (§2.14)), and as a result it is clear that WDC is failing its most vulnerable residents.
- 3.90 Whilst it is acknowledged that WDC does facilitate the delivery of some affordable housing, it is neither of a sufficient quantum, nor with sufficient pace to match even newly arising housing need, let alone to make meaningful inroads to address the backlog of need experienced in WDC.
- 3.91 The current five year affordable housing supply proposes addressing between c.18% and 22% of need with future supply. The Appeal Scheme would deliver 35% affordable housing (43 affordable homes when capacity is up to 124 homes). This would make a meaningful contribution towards local affordable housing delivery.

4 Affordability of the local housing market

- 4.1 There is a spectrum of affordability in a typical housing market. Generally, outright ownership in a housing market is the most expensive option and requires the highest house price to income affordability ratio to achieve. Rental market options can be less expensive than outright ownership and may not have such onerous upfront deposit requirements to meet to be viable.
- 4.2 The need for any affordable housing is created when people with a need to live locally are unable to fulfil their housing needs in the open market. Where all forms of market housing are unaffordable for a local resident, affordable housing provides homes that are less expensive than market housing options.
- 4.3 Affordable housing is defined in Annex 2 of the National Planning Policy Framework. The overarching principles are that it is housing for sale or rent, for those whose needs are not met by the market. Affordable housing types include; social rent, affordable rent, starter homes, First Homes, discount market sale and other lower cost home ownership routes, including shared ownership and Rent to Buy.
- 4.4 Intermediate housing types such as shared ownership and discount market rent are less expensive forms of housing than market housing, provided for households who meet the stipulated affordability criteria, but who are not eligible to join the Local Authority's Housing Register.
- 4.5 The least expensive housing options are rented tenure homes, typically let by an Affordable Housing Provider or Council directly. People eligible to move into the lowest cost rental homes are eligible to join the Local Authority Housing Register, provided they also meet other non-financial criteria set in place by each Local Authority independently.

The need for affordable housing

- 4.6 Affordable housing can therefore be considered in two distinct parts. Firstly, rented tenures (social rent and affordable rent) provided to households on the Housing Register. Secondly, intermediate tenures provided to people who are not eligible to join the Housing Register, but by means of income can qualify to live in intermediate sale or rental tenures.
- 4.7 The Housing Register gives a sense of the scale of need for rented homes locally. Most local authorities do not hold intermediate housing eligibility lists, therefore the scale of need for intermediate housing can be appreciated by assessing the affordability 'gap' in a local market. The affordability gap occurs below the market access cost for housing, and above the income threshold below which an individual is allowed onto the Housing Register.

Wealden District Housing Market

- 4.8 The ONS median house price for Wealden District (WD) is £390,000, in the most recent dataset available in February 2024¹⁰.
- 4.9 Land Registry data¹¹ indicates that in April 2013, the 'all property average price' in WD was £250,005. This rises to £406,939 in December 2023 (last reported data). This represents an increase of 63% over a c.10 year time frame, the same time frame as the plan period to date.
- 4.10 This tracks slightly below the wider East Sussex increase (73%), and broadly in line with the south east region (66%), over the same time period.

Local incomes and affordability

- 4.11 The median income for full time employees in WD is £34,735 in the 2023 ONS provisional data set¹². This reduces to £27,817 when considering all employee jobs in WD.
- 4.12 The median house price for WD is £380,000, in the ONS data for y/e September 2022¹³ and the median full time income for the same time period is quoted as £32,256¹⁴. This means that the affordability ratio for WD as a whole is 11.78 times¹⁵, which is significantly above the all England affordability ratio of 8.28 times for 2022.¹⁶
- 4.13 For year ending September 2013 (concurrent with the start of the Core Strategy), the median house price was £239,995 the median income was £28,271 and the affordability ratio was 8.49 times.
- 4.14 This demonstrates that while local house prices rose by c.58% over the past ten years, local incomes increased by approximately 14%; showing that the local housing market is becoming less affordable over time. This will be impacted by, inter alia, lack of supply compared with demand and circumstantial factors like the step change in geographical areas that commuters are willing to live in, when faced with options for more home and flexible working since the COVID-19 pandemic.

¹⁰ Office for National Statistics, *Median house prices for administrative geographies: HPSSA dataset 9, Table 2a* <<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianhousepriceforationalandsubnationalsectorquarterlyrollingyearhpssadataset09>>, [accessed 28 February 2024]

¹¹ Land Registry, *UK House Price Index* <<https://landregistry.data.gov.uk/app/ukhpi/browse?from=2013-04-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2Fwealden&to=2024-02-01&lang=en>> [accessed 28 February 2024]

¹² Office for National Statistics, *Earnings and hours worked, place of residence by local authority: ASHE Table 8, PROV – Home Geography Table 8.7a Annual pay – Gross 2023*, <<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/placeofresidencebylocalauthorityashtable8>>, [accessed 28 February 2024]

¹³ Office for National Statistics, *House price to residence-based earnings ratio, Tables 5a, 5b and 5c* <<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>>, [accessed 28 February 2024]

¹⁴ *ibid*

¹⁵ *ibid*

¹⁶ Office for National Statistics, *House price to residence-based earnings ratio, Table 1c* <<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>> [accessed 28 February 2024]

Access to market housing for ownership

- 4.15 The local affordability ratio is relevant because most purchasers rely on a mortgage to purchase a property, and mortgage providers consider affordability to the purchaser to determine how much they are willing to lend.
- 4.16 The mortgage market uses many affordability tests to determine eligibility for a mortgage in the current market, however the income multiple remains a relevant consideration. For mainstream, low/medium risk lending on a first home purchase, a four times income multiple can be accessible to joint applicants¹⁷. Single purchasers may be afforded a little more headroom with a 4.5 – 5 times multiplier not uncommon.
- 4.17 If a purchaser services significant debt repayments or other outgoings relative to income, this multiple may be reduced. If the purchaser is a particularly low risk borrower, the multiple may be increased. Larger multiples tend to be more readily available once the loan to value ratio drops below c. 80% - 70% - an unlikely scenario for many first time buyers.
- 4.18 The below sets out an approximate consideration of the mortgage capacity that two people on local average, full time earnings, purchasing a property together would generate.

Individual income (LA full time average)	£34,735
Joint income (two working people in one household)	£69,470
Deposit (10%)	£31,000
Income multiplier for mortgage	4x
Mortgage capacity ±	£278,000
Maximum property value ±	£309,000

Table 17: Illustrative mortgage capacity for two individuals on local full time average earnings

- 4.19 This demonstrates that with a local median house price of £380,000, two people purchasing together would not be able to create sufficient mortgage capacity to afford a median priced market house locally.
- 4.20 This begins to demonstrate the depth of housing need in the WD market on financial principles alone, when at least half of the local working population is unable to afford the average priced local home.
- 4.21 Working on the same affordability principles set out in Table [17] above, the required income to afford access to the median house is c. £42,750 each, on the principle that two full time working individuals are purchasing jointly. (123% of the local median income)

¹⁷ Online Mortgage Advisor, *Salary and income mortgage multiples*,
<<https://www.onlinemortgageadvisor.co.uk/mortgage-affordability/mortgage-income-multiples/>> [accessed 28 February 2024]

- 4.22 If the required joint purchasing c.£42,750 annual income is assessed against the 2023 income data, it evidences that between 30% and 40% of local full time working people could afford access to home ownership on these terms, already assuming they had access to sufficient savings to meet the requirements to pay a deposit¹⁸. For a £380,000 purchase, this would be savings in the order of at least £38,000 plus all taxes and fees.
- 4.23 More realistically, if the assumptions are amended to take account of all employees (not only full time) the c.£42,750 individual income threshold is not reached until over the 75th percentile, thereby meaning home ownership is affordable to less than 25% of local working people.
- 4.24 Equally, if a single purchaser (full time employee basis) on a generous five times affordability multiplier is considered for a mortgage, the income required for access to market housing is approximately £68,500 (with a £38,000 deposit), placing the individual significantly above the 70th percentile (uppermost percentile data available) local working income threshold of £45,786¹⁹.

Lower quartile house prices and incomes

- 4.25 The lower quartile house price for WD at September 2022 is £295,000, and the corresponding lower quartile income is £24,833²⁰. This gives an affordability ratio of 11.88, which is marginally less affordable than the 11.78 times ratio experienced at median house prices and incomes. This demonstrates that at the less expensive end of the housing market, those on lower quartile incomes and below (25% of the local population) have more difficulty, i.e. a higher affordability ratio, to access the respective sector of the housing market than those at the midpoint.
- 4.26 At the lower quartile of the market, there is also a worsening affordability position in WD in 2022 than in 2013, when the lower quartile house price to affordability ratio was 9.3 times.
- 4.27 Over the nine year period, lower quartile house prices grew by c.£115,000, or 64%, whilst incomes grew by £5,480 or 28%. This disparity in the rate of increase between house prices and incomes results in a continually worsening affordability position.

Access to market housing for rent

- 4.28 The ONS Private Rental Market Statistics release²¹ from December 2023 reports that median rents for October 2022 to September 2023 for WD were £1,150 per month. Lower quartile rents were £920 per month.

¹⁸ Office for National Statistics, Earnings and hours worked, place of residence by local authority: ASHE Table 8, Home Geography Table 8.7a Annual pay – Gross 2023, <<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/placeofresidencebylocalauthorityashtable8>>, [accessed 28 February 2024]

¹⁹ There are no full time work percentile data thresholds above 70th, as there is insufficient data to provide a reliable estimate.

²⁰ Office for National Statistics, *House price to residence-based earnings ratio, Tables 6a, 6b and 6c* <<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>>, [accessed 6 March 2024]

²¹ Office for National Statistics, *Private rental market summary statistics in England (14 December 2022)* <<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/privaterentalmarketsummarystatisticsinengland>>, [accessed 28 February 2024]

- 4.29 The ONS uses a generic marker of rental affordability as being able to spend less than 30% of income on housing costs, when assessing affordability. Consequently, maximum private rental affordability in WD can be calculated as follows.

	Median Rent	Lower Quartile (25%) Rent
A. Rental cost pcm	£1,150	£920
B. Monthly income required (limit) for rent to be affordable ($A/30 * 100$)	£3,825	£3,050
C. Annual income required to pay rent ($B * 12$)	£46,000	£36,750

Table 18: Private market rental affordability analysis

- 4.30 The above data demonstrates that to afford the lower quartile rents in the open market, an annual income of c. £36,750 is required, when required rent is equivalent to no more than 30% of income.
- 4.31 The 2023 median local income (full time) is £34,735 and an income of £36,750 is observed in the 50th – 60th percentile. This means even lower quartile rents would not be affordable to over half of the local full time working population if the requirement to cap rental payments at 30% of income is observed and a property is rented by an individual.
- 4.32 If two joint incomes (all jobs) are considered to reach the £36,750 income requirement, a lower quartile priced rental property would be accessible to 60% - 70% of local working people, on a joint basis. A median priced rental property would be accessible to 50% - 60% of local working people on the same basis.
- 4.33 To afford the median rent, a single renter (full time job) would need an annual income of c.£46,000, observed above the 70th percentile of local full time working incomes. This means less than 30% of the local full time working population would be able to afford the median rent without breaching affordability guidelines.
- 4.34 More realistically, if the assumptions are amended to take account of all employees (not only full time) the £46,000 individual income threshold is not reached until over the 75th (maximum shown) percentile, thereby meaning median priced rental properties are affordable to less than 25% of local working people, if renting as an individual.

Housing affordability 'gap' summary

- 4.35 Table 19 summarises local housing affordability. Owner occupation on the most affordable basis (lower quartile prices and with joint purchasers) should be available to up to 60% of the local full time working market, based on local income data. This assumes potential purchasers already have saved a sufficient deposit to be granted access to a mortgage (£29,500 + taxes and fees in this case).
- 4.36 Market rent on the most affordable basis (lower quartile rents with joint renters) should be available to up to 70% of the local working market, assuming they are anticipating renting on the terms set out above. Single occupation of a rental property is clearly commensurately more expensive.

Tenure	Owner occupation			Market rent			
Price threshold	Median house price		Lower quartile price	Median rent		Lower quartile rent	
Occupation	Single ownership	Joint ownership (2x)	Joint ownership (2x)	Single occupation	Joint occupation (2x)	Single occupation	Joint occupation (2x)
Income required	£68,500	£42,750	£33,000	£46,000	£23,000	£36,750	£18,250
Full time / all incomes basis	Full time	Full time	Full time	Full time	All jobs	Full time	All jobs
Proportion of local population able to meet monthly payments, based on ONS income data	<30%*	30% - 40%	50% - 60%	<30%*	50% - 60%	40% - 50%	60% - 70%

Table 19: Affordability 'gap' analysis. Uses 2023 provisional WD income deciles.

*income data sample too small above 70% threshold for full time employees and 75% threshold for all employees to produce an accurate result, so no data provided. 70th percentile threshold for full time employees is £45,786

- 4.37 Nonetheless, this demonstrates that even the access points to market rent and home ownership on the most affordable terms, are not within reach for 30% and 40% of the local working population respectively.
- 4.38 It is anticipated by the government in its definitions of affordable housing that intermediate housing products are provided to address housing need in this economic group.
- 4.39 In very round terms, 30% of the population in work in WD equates to approximately 10,500 people, unable to afford access to market rent properties (the cheapest market housing solution) in the open market. Whilst it is not a WD core priority to house the people locally in this group, they form a very significant proportion of local housing need.
- 4.40 Constrained market housing supply, mortgage affordability and the under delivery of affordable housing of all types widens the housing 'affordability gap' each year, disproportionately affecting young people starting careers and lower paid workers, often employed in vital, local public sector roles and/or contributing significantly to the local environment and community.
- 4.41 The ability to provide housing that facilitates the retention of these young people and/or key workers locally is a critical component of the perpetuation of mixed and balanced communities that support the local economy.
- 4.42 The affordability constraints discussed in this section do not even begin to consider the affordability of market housing options for people not in employment, or those employed on temporary contracts. They are all additional to the above affordability analysis and compound the issue of constrained access to affordable homes in Wealden District.

Housing Register

- 4.43 The Housing Register is a list of people who have evidenced that they are not able to fulfil their housing need in the market independently and have qualified as eligible under the terms set out by each Local Authority independently.
- 4.44 Whilst qualification terms must be reasonable and justifiable, they are not nationally defined and are subject to legal challenge. Households deemed to have the financial means to access market housing in some form are not required to be included on the Housing Register.
- 4.45 Those in most pressing need of affordable housing without means to access the least expensive market housing are eligible for entry onto the WDC Housing Register. The total number on the Housing Register as of April 2023 is 743 households, as stated by the Council in the response to the Freedom of Information request provided at **Appendix Two**.

- 4.46 The housing need experienced by those eligible spans the full range of unit sizes. The current snapshot of unit size need is as detailed in Table 20 below²².

	Total Households on Housing Register at April 2023
1 bed	342
2 bed	242
3 bed +	159
Total	743

Table 20: Housing Register April 2023 make up of housing need

- 4.47 There is significant affordable housing need across all unit sizes therefore the Appeal Scheme would contribute positively to the local affordable housing stock at all sizes, helping to reduce the amount of time people are waiting for a home.
- 4.48 There are fluctuations in the number of people on the Housing Register over the period since 2013, despite the level of affordable housing delivery generally rising over time on average.
- 4.49 In the current macro-economic climate, the country has been experiencing a period of financial instability and rapidly inflating household costs. Typically, housing costs are inflating faster than wages, consequently, it is to be expected that more people will be eligible for entry on to the Housing Register in the coming months.
- 4.50 The average waiting time per type of affordable home from 2020/'21 to 2022/'23 is set out below in table 21.

	01 Apr 2020 – 31 Mar 2021	01 Apr 2021 – 31 Mar 2022	01 Apr 2022 – 31 Mar 2023
1 bed	8 months	8 months	10 months
2 bed	9 months	8 months	9 months
3 bed	10 months	12 months	13 months
>3 bed	9 months	19 months	24 months

Table 21: Average waiting time for affordable homes per annum

- 4.51 The general trend shows waiting times to be housed increasing across the unit types over the last three years. This is at a time (2020 – 2023) when the number of households on the WDC Waiting List increases from 627 to 743.
- 4.52 The increasing in length of wait for larger family housing, would suggest that there is an acute need for family affordable housing in the district and that not enough of it is being developed. Therefore, the proposed family housing of the Appeal Scheme would specifically target a clear and pressing local affordable housing need.
- 4.53 The Appeal Scheme on completion has the capacity to increase the local affordable housing supply in Hellingly. This would be a positive addition for the local environment, facilitating more younger people being able to afford to remain in the local area, supporting a mixed and balanced local community, contributing to the local economy and potentially being employed locally.

²² Department for Levelling Up, Housing and Communities, *Local Authority housing statistics data returns for 2022 to 2023*, < <https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2022-to-2023>> [accessed 25 March 2024]

5 Benefits of Affordable Housing

- 5.1 Affordable housing delivery is not only about the provision of housing for people who need it – it can be a gateway to a better life.
- 5.2 Affordable housing provides security of tenure; an incentive to invest in the local community and view a house as a home. It is provided at a known and predictable cost and comes with the support of a financial assistance team when owned and managed by an Affordable Housing Provider (AHP), with a long term interest in the local area.
- 5.3 Known housing costs facilitate calculation of income to spend on bills, food and clothes. For some families this is transformational. Budgeting to afford energy costs for a month, food shopping and school uniform is not a universal skill. Residents who would live in the affordable homes in the Appeal Scheme would benefit from support to achieve this via a local AHP.
- 5.4 A scheme that could deliver up to 43 affordable homes, based on the total scheme capacity of 124 homes would include family housing, and therefore children among the new residents. For those who would move into this affordable housing and experience housing that fully meets need, potentially for the first time, this has the potential to fundamentally change the way these children access education.
- 5.5 Psychologist Maslow created a hierarchy of need in the 1940s to explain how effort and motivation are correlated in human behaviour. The principle of the theory is that an individual's more basic needs must be met, before they are motivated to achieve higher level needs.
- 5.6 In this theory, physiological needs are the first step – the need for water, food, shelter, heat and clothes. Next is the need for safety – a safe environment, free from danger that facilitates personal and emotional security. The next step is the need for love and social belonging, facilitated by cohesive families and trusting friendships. Only after this do people address esteem and cognitive needs. This is where, children particularly, feel secure enough in their surroundings and themselves, to access education and allow their brains to feel creativity and curiosity for learning.
- 5.7 An affordable home can often provide the catalyst for all levels of the Maslow hierarchy before esteem and cognitive needs. Not only does it provide the obvious shelter and safe environment, it can provide more financial security for families, which takes away a common external pressure and allows children to experience family life with fewer strains, feel truly loved and understood. With this base security in place, money available for regular nourishing food and the physical space to allow learning to take place, a child's experience of education can be transformed.
- 5.8 Consequently, the principal point is that the delivery of 35%, or up to 43 affordable homes (based on a capacity of 124 homes) on this site, deliverable in the short to medium term, should not be underestimated.
- 5.9 Should planning permission be granted, it is not excessive to suggest that the affordable homes provided on the Appeal Scheme will transform the lives of some



local families. This goes beyond the basic needs for shelter and security and extends to the unquantifiable benefits of the opportunity provided by education for children.

6 Summary

Proposed Appeal Scheme

- 6.1 The proposed Appeal Scheme consists of [an outline] planning application for up to 124 new homes, including 35% affordable housing provision (equating to up to 43 affordable homes, based on 124 homes capacity) on land south of the A271 and east of the A22, Lower Horsebridge, in Wealden District.
- 6.2 The adopted policy position set out in *AFH1: Affordable Housing* of the WDC Affordable Housing Delivery Local Plan (May 2016) requires the delivery of 35% affordable housing on all development sites which propose 5 or more (net) dwellings, therefore the Appeal Scheme meets this requirement.
- 6.3 The Appeal Scheme will provide affordable housing in a variety of tenures, to include First Homes, Intermediate and Rented affordable housing, in line with guidance provided in the NPPF, Ministerial Statements, local guidance and feedback from the WDC Housing Officer (CD3.18).

Historic affordable housing delivery

- 6.4 The historic net delivery performance of affordable housing in Wealden District is detailed in the tables below, measured against contemporaneous affordable housing need. Gross affordable housing delivery across the Plan period is detailed in Table 5 above.

	Affordable Housing Completions	2016 SHMA Affordable Housing Need (net)	Annual shortfall / surplus in Affordable Housing Delivery (net)	Cumulative shortfall / surplus in Affordable Housing Delivery (net)
April 2013 – March 2014	179	331	-152	-152
April 2014 – March 2015	179	331	-152	-304
April 2015 – March 2016	61	331	-270	-574
April 2016 – March 2017	59	331	-272	-846
April 2017 – March 2018	123	331	-208	-1,054
TOTAL	601	4,060		-1,054

Table 7: Affordable housing need and delivery April 2013 – March 2018

	Affordable Housing Completions (net)	2021 HNA Affordable Housing Need (net)	Annual shortfall / surplus in Affordable Housing Delivery (net)	Cumulative shortfall / surplus in Affordable Housing Delivery (net)
April 2018 – March 2019	115	854	-739	-739
April 2019 – March 2020	255	854	-599	-1,338
April 2020 – March 2021	266	854	-588	-1,926
April 2021 – March 2022	163	854	-691	-2,617
April 2022 – March 2023	199	854	-655	-3,272
TOTAL	998	4,270		-3,272

Table 8: Affordable housing need and delivery April 2018 – March 2023

- 6.5 This shows that after social housing stock losses, the Council has facilitated the delivery of 1,599 (601+998) net affordable homes over the ten years to March 2023. This is an average delivery rate of 160 homes per annum over the Plan period, or 23% of total housing delivery.
- 6.6 This is below the 35% affordable housing target sought by policy *AFH1: Affordable Housing*.
- 6.7 The data also shows a shortfall in affordable housing delivery of -3,272 homes when compared with affordable housing need, to March 2023.
- 6.8 If the affordable housing delivery deficit is distributed equally over the five year period ('18 – '23), it averages a delivery deficit of -654 affordable homes per annum, or a deficit of c. 77% of affordable housing need.
- 6.9 The Council's track record for affordable housing facilitation (April 2018 – March 2023) is therefore 998 affordable homes (net) out of the 4,270 homes required by the assessment of affordable housing need identified in the 2021 HNA.
- 6.10 Over the last five years, this meets c.23% of the affordable housing need, but more importantly leaves approximately 3,272 households without appropriate affordable housing.

Potential future total housing supply

- 6.11 For the purposes of this Appeal, WDC have indicated that they are willing to agree a range of delivery. The top end of the range is 3.83 years, whilst the Appellant's position is 3.14 years, which is yet to be agreed. This is equivalent to a shortfall of between -1,687 and -2,674 homes over the five year period, when compared with the five year requirement (inc. buffer) of 7,200 homes.

Potential affordable housing supply

- 6.12 The potential affordable housing supply for the next five years will arise largely via large existing sites with planning permission.
- 6.13 Using the WDC 5YHLS as the baseline position yields a total potential affordable housing supply of 1,661 homes, or 332 homes per annum (a policy compliant 35% of 4,745 homes). Adopting the Appellant's 5YHLS baseline yields 1,332 affordable homes, or 266 affordable homes per annum (a policy compliant 35% of 3,806 homes)
- 6.14 Both of these assessments are likely to be overstated. The average net affordable housing delivery over the Plan period to date is c. 160 affordable homes per annum. If *this* trend were to continue for the upcoming five years, an estimated 800 affordable homes total, would come forward over the 5YHLS period to 2028 (160 * 5). Consequently, the five year potential affordable housing supply at either 1,332 or 1,661 homes would represent a very optimistic upturn in affordable housing supply rates over the upcoming five year period.

Balance between affordable housing need and supply

- 6.15 When the current affordable housing delivery backlog (3,272 dwellings) is addressed using the Sedgefield Approach, and added to ongoing annual need, the 2021 HNA affordable housing need of 854 dwellings per annum rises to 1,508 dwellings per annum for the upcoming five year period. This totals a five year affordable housing need of 7,540 homes.
- 6.16 On this basis, the shortfall in affordable housing supply as set out below in Table 16, is a very substantial -5,879 to -6,208 homes, or up to 82% of affordable housing need not being met.

		WDC 5YHLS	Appellant 5YHLS
A	Total supply of affordable dwellings for April 2023 – March 2028	1,661	1,332
B	Five-year affordable housing need including current backlog (Sedgefield Approach) 2021 HNA (1,508 dpa)	7,540	7,540
C	Shortfall (A-B)	-5,879	-6,208

Table 16: Potential affordable housing supply compared with 2021 HNA affordable housing need, including current backlog

- 6.17 Evidently, much more needs to be done within the district to address the acute, persistent, and worsening local affordable housing crisis.

Affordability of local affordable housing

Wealden District housing market

- 6.18 The ONS median house price for Wealden District (WD) is £390,000, and Land Registry data indicates that house prices have increased by 63% over a c.10 year time frame; the same time frame as the Plan period to date.
- 6.19 The median income for full time employees in WD is £34,735 in the 2023 ONS provisional data set. This reduces to £27,817 when considering all employee jobs in WD.
- 6.20 At last reporting, the affordability ratio for WD as a whole is 11.78 times, and nine years ago the affordability ratio was 8.49 times.
- 6.21 This demonstrates that while the 'all property average' price rose by c. 58% over the past ten years, local incomes increased by approximately 14%; showing that the local housing market is becoming even less affordable over time and the affordability gap is widening. This means fewer people can afford to address their own housing need in the open market, and the provision of affordable housing plays a more important role in the housing market, for more people.

Quantifiable affordable housing need

- 6.22 Those in most pressing need of affordable housing without means to access the least expensive market housing are eligible for entry onto the WDC Housing Register. The latest reported Housing Register total households (2022/2023) is 743 households.

- 6.23 If WDC facilitated development at the current average net affordable housing delivery rate of 160 homes per annum (1,599/10) it would take over four and a half years to house the current Housing Register. There needs to be a timely push for affordable housing delivery locally if the Council is to make meaningful inroads to addressing the backlog of housing need that exists, alongside newly emerging housing need during a period of high housing costs and worsening affordability.
- 6.24 Most Local Authorities do not hold intermediate housing eligibility lists, therefore the scale of need for intermediate housing can be approximated by assessing the affordability 'gap' in a local market. The affordability gap occurs below the market access cost for housing, and above the income threshold below which an individual is allowed onto the Housing Register.
- 6.25 Owner occupation on the most affordable basis (lower quartile house prices, i.e. the price it would cost to access the cheapest quarter of the market and with joint purchasers) should be available to up to 60% of the local full time working market, based on local income data. This assumes potential purchasers already have saved sufficient deposit to be granted access to a mortgage. (£29,500 + taxes and fees in this case).
- 6.26 The access point to home ownership on the most affordable terms, for joint purchasers, is not within reach for 40% of the local, full time working population.
- 6.27 Market rent on the most affordable basis (lower quartile rents with joint renters) should be available to up to 70% of the local working market. Renting on an independent basis is clearly commensurately more expensive.
- 6.28 The access point to market rent on the most affordable terms, for joint renters, is not achievable for approximately 30% of the local, working population.
- 6.29 In very round terms, 30% of the population in work in WD equates to approximately 10,500 people, unable to afford access to market rent properties (the cheapest market housing solution) in the open market. Even more cannot afford to purchase a property. Whilst it is not a WD core priority to house the people locally in this group, they form a very significant proportion of local housing need.
- 6.30 Constrained market housing supply, mortgage affordability and the under delivery of affordable housing of all types widens the housing 'affordability gap' each year, disproportionately affecting young people starting careers and lower paid workers, often employed in vital, local public sector roles and/or contributing significantly to the local environment and community.
- 6.31 The ability to provide housing that facilitates the retention of young people and/or key workers locally is a critical component of the perpetuation of mixed and balanced communities that support the local economy and the long term success of a place.

Benefits of affordable housing

- 6.32 Affordable housing delivery is not only about the provision of housing for people who need it – it can be a gateway to a better life.

- 6.33 Affordable housing provides security of tenure; an incentive to invest in the local community and view a house as a home. It allows households to operate within a fixed financial set of parameters, to learn to budget appropriately for life where necessary and potentially even start to build savings.
- 6.34 It can provide safety and security for children, from which a platform for successful integration with education can be built. It is not excessive to suggest that the affordable housing proposed at the Appeal Scheme has the potential to transform the lives of some local families.

Conclusion

- 6.35 The proposed Appeal Scheme, on completion, would provide 35% of the up to 124 homes proposed, (up to 43 affordable homes) as affordable housing. This responds positively to clear and pressing local need for affordable housing delivery. It also appropriately addresses Affordable Housing Delivery Local Plan policy *AFH1*, with the provision of affordable housing.
- 6.36 When the current affordable housing delivery backlog (3,272 dwellings) is addressed using the Sedgefield Approach, and added to ongoing annual need, the 2021 HNA affordable housing need of 854 dwellings per annum rises to 1,508 dwellings per annum for the upcoming five year period. This totals a five year affordable housing need of 7,540 homes.
- 6.37 Using the WDC 5YHLS as the baseline position yields a total potential affordable housing supply of 1,661 homes, or 332 homes per annum (a policy compliant 35% of 4,745 homes). Adopting the Appellant's 5YHLS baseline yields 1,332 affordable homes, or 266 affordable homes per annum (a policy compliant 35% of 3,806 homes)
- 6.38 Both of these assessments are likely to be overstated. The average net affordable housing delivery rate over the Plan period to date is 160 homes per annum, compared with potential supply rates of between 266 and 332 per annum. It is therefore a generous assumption to include a policy compliant affordable housing delivery rate on all of the relevant supply.
- 6.39 On this basis, the shortfall in affordable housing supply is a very substantial -5,879 to -6,208 homes. This equates to up to 82% of affordable housing need left unaddressed.
- 6.40 The local, median house price for Wealden District is £390,000, and the median income for full time employees is £34,735. The affordability ratio is 11.75 times and the average mortgage affordability multiplier is four to five times. While local house prices rose by c. 58% over the past ten years, local incomes increased by approximately 14%; showing that the local housing market is becoming even less affordable over time and the affordability gap is widening.
- 6.41 The Housing Register contained 743 households at last reporting, and at the current average net affordable housing delivery rate of 160 homes per year, it would take over four and a half years to house the current Housing Register. This excludes all newly arising affordable housing need from now.

- 6.42 Access points to market rent and home ownership (joint) on the most affordable terms, are not within reach for 30% and 40% of the local working population respectively and this is the target group for intermediate housing eligibility.
- 6.43 In very round terms, 30% of the population in work in WD equates to approximately 10,500 people, unable to afford access to market rent properties (the cheapest market housing solution) in the open market. Even more cannot afford to purchase a property.
- 6.44 This note demonstrates with evidence that the need for affordable housing is acute and the potential for supply is constrained. Local housing affordability is worsening and the current macro-economic climate is very likely to exacerbate that situation.
- 6.45 The Appeal Scheme proposes 35% affordable housing, or up to 43 affordable homes (based on a capacity of 124 total homes) over various tenure types, at a mix of unit sizes and to be long term managed and maintained by a local Affordable Housing Provider. This complies with local affordable housing policy and guidance.
- 6.46 Whilst compliance with planning policy may be viewed as 'normal' in this Appeal context, the provision of secure housing in an otherwise locally unaffordable housing market (with an already acute affordable housing need) has the potential to profoundly change the lives of up to 43 local households. This would be far from ordinary.

Appendices

Appendix 1 – Freedom of Information Request



Wealden District Council
Council Offices
Vicarage Lane
Hailsham
BN27 2AX
(By Email:
informationgovernance@wealden.gov.uk)

9 February 2024

Our Reference: 688202

Dear Sir / Madam

Wealden District Council – Freedom of Information Request

The Freedom of Information Act 2000 provides public access to information held by public authorities. I am writing to request the data, as outlined below, in line with the provisions of the Act.

The below questions assume the most up to date housing completion metrics available are from April 2022 – March 2023, however if any data is collated based on a calendar year (i.e. Jan 2023 - Dec 2023) in any categories, please indicate where and include it below.

Where applicable, please input the data into the blank table provided.

For some questions data has been requested which relates to 'Hellingly Parish' if data for this parish is not available, please provide the data for the smallest spatial geography which includes the village of Lower Horsebridge.

Housing Waiting List

1. We note that in relation to the number of households on the Council's Housing Waiting List, the latest government Local Authority Housing Statistics 2022 - 2023¹ states the below. Please you could clarify in the blank table below whether this matches the most accurate and most up to date information held by the Council?

If you have the below data with and without '*Transfer cases*' (those currently in social housing who have been assessed as in need of moving) please can you provide it for both circumstances.

Government Local Authority Housing Statistics 2022 - 2023

	No. of Households
Total:	743
1 Bedroom	342
2 Bedroom	242
3 Bedroom	126
More than 3 Bedrooms	33

Wealden District Council Housing Statistics 2022 - 2023

¹ <https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2022-to-2023>

	No. of Households (without Transfer Cases)	No. of Households (with Transfer Cases)
Total:		
1 Bedroom		
2 Bedroom		
3 Bedroom		
More than 3 Bedrooms		

2. The average number of bids received for 1-bed, 2-bed, 3-bed and >3-bed homes for the years within the below table:

	No of Bids
2020 - 2021	
1 Bed	
2 Bed	
3 Bed	
>3 Bed Homes	
2021 - 2022	
1 Bed	
2 Bed	
3 Bed	
>3 Bed Homes	
2022 - 2023	
1 Bed	
2 Bed	
3 Bed	
>3 Bed Homes	

3. If data for the timeframes as requested above (Question 2) is not available, then any data available for the numbers of bids received for 1-bed, 2-bed, 3-bed and >3-bed homes, and the corresponding time period i.e. lettings in the last week, the last month, the last quarter and so on.
4. The average waiting times reported at 1st April each year below for the following types of affordable homes across the District:

	Average Waiting Time
2021	
1 Bed	
2 Bed	
3 Bed	
>3 Bed Homes	
2022	
1 Bed	
2 Bed	

3 Bed	
>3 Bed Homes	
2023	
1 Bed	
2 Bed	
3 Bed	
>3 Bed Homes	

Temporary Accommodation

5. The number of households on the Wealden District Council Housing Register housed in temporary accommodation inside and outside Wealden District Council boundary on 1st April of the following years.

Year	Inside Wealden District Council Boundary	Outside Wealden District Council Boundary
2013		
2014		
2015		
2016		
2017		
2018		
2019		
2020		
2021		
2022		
2023		

Ownership Type

6. What has been the total number of dwellings by ownership type (Local Authority owned / Registered Provider owned / Privately owned / Other ownership) in the Wealden District, per annum between 2013 and 2023.
7. What has been the total number of dwellings by tenure / ownership type (Local Authority owned / Registered Provider owned / Privately owned / Other ownership) in the Hellingly Parish (or the smallest applicable geography to Lower Horsebridge), per annum between 2013 and 2023.

	Total number of dwellings by ownership type.							
Year	LPA Owned		RP Owned		Privately Owned		Other	
	Total LPA	Hellingly Parish	Total LPA	Hellingly Parish	Total LPA	Hellingly Parish	Total LPA	Hellingly Parish
2013								
2014								
2015								
2016								
2017								
2018								

2019								
2020								
2021								
2022								
2023								

Social housing stock

8. Please complete the table below to show the total number of social housing dwellings at 1st April of the following years within Wealden District.

Year	Total number of social housing dwellings
2013	
2014	
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	

9. Please complete the table below to show the total number of social housing dwellings at 1st April of the following years within Hellingly Parish (or the smallest applicable geography to Lower Horsebridge).

Year	Total number of social housing dwellings in Hellingly Parish
2013	
2014	
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	

10. Whether any part of the Local Authority's social housing dwelling stock has been transferred to another organisation or organisations. If so, when did the transfer(s) take place, and who was the recipient organisation.

Social housing lettings

11. Please complete the table below to confirm the number of social lettings between 2013 and 2023 (per annum) within Wealden District.

Year	Total number of social lettings
2013	
2014	
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	

12. Please complete the table below to show the total number of social housing dwellings at 1st April of the following years within Hellingly Parish (or the smallest applicable geography to Lower Horsebridge).

Year	Total number of social housing lettings in Hellingly Parish
2013	
2014	
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	

Housing completions

15. Please confirm that the table below, represents the most up to date information held for full year net housing (Compiled from Wealden District Council's latest Authority Monitoring Report (AMR) (2022/23) (Appendix 1D)) and affordable housing (Compiled from AMRs 2013/14 – 2022/23) completions in the District to date.

Year	WDC Average Housing requirement	Net Housing Completions	Affordable Housing Completions (net or gross – delete as appropriate)	% of completions as AH

2013-2014	450	560	201	35.8%
2014-2015	450	576	193	33.5%
2015-2016	450	520	82	15.7%
2016-2017	450	564	81	14.3%
2017-2018	450	462	144	31.1%
2018-2019	450	828	130	15.7%
2019-2020	450	1,034	273	26.4%
2020-2021	450	722	275	38%
2021-2022	450	685	176	26%
2022-2023	450	1,138	218	19%

16. We note that it is not clear within the Wealden District Council's Authority Monitoring Report's if the affordable housing completions data is Net or Gross Affordable Housing Completions. Please confirm the opposite type of (Gross / Net) affordable housing completions to those shown above for the whole District per annum since 2013, in the table below.

Year	Total number of <u>net</u> / <u>Gross</u> affordable housing completions
2013	
2014	
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	

17. Please provide the Net / Gross number of market and affordable homes completed in Hellingly Parish for the period 2013 – 2014, to 2022 – 2023 in the table below.

Monitoring period	Number of new market homes completed (Net / Gross)	Number of affordable homes completed (Net/ Gross)
2013 - 2014		
2014 - 2015		
2015 - 2016		
2015 – 2016		
2016 – 2017		
2017 – 2018		
2018 - 2019		
2019 - 2020		
2020 - 2021		

2021 – 2022		
2022 - 2023		

Housing Planning permissions

18. Please provide the **net and gross** number of market and affordable homes granted planning permission in Wealden District for the period 2013 – 2014, to 2022 – 2023 in the table below.

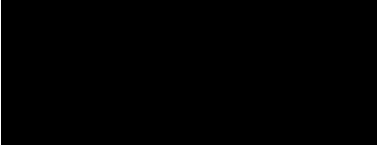
Monitoring period	Number of new market homes granted permission (net / gross)	Number of affordable homes granted permission (net / gross)
2013 - 2014		
2014 - 2015		
2015 - 2016		
2015 – 2016		
2016 – 2017		
2017 – 2018		
2018 - 2019		
2019 - 2020		
2020 - 2021		
2021 – 2022		
2022 - 2023		

19. Please provide the Net / Gross number of market and affordable homes granted planning permission in Hellingly Parish for the period 2013 – 2014, to 2022 – 2023 in the table below.

Monitoring period	Number of new market homes granted permission (Net / Gross)	Number of affordable homes granted permission (Net/ Gross)
2013 - 2014		
2014 - 2015		
2015 - 2016		
2015 – 2016		
2016 – 2017		
2017 – 2018		
2018 - 2019		
2019 - 2020		
2020 - 2021		
2021 – 2022		
2022 - 2023		

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

Yours Faithfully,

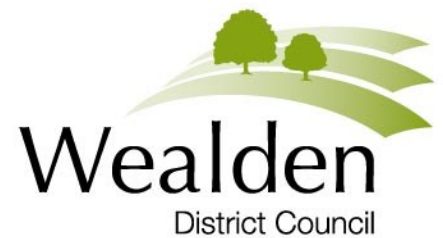


Gemma Saffhill

Technical Director – Affordable Housing and Viability

**Appendix 2 - Correspondence received from Wealden District
Council with regard to tor&co FOI Request**

OUR REF: **FOI 24-0775**
ASK FOR: **Information Governance**
DATE: **7 March 2024**



Information Governance
informationgovernance@wealden.gov.uk

Sent by email to:

[REDACTED]

Dear [REDACTED]

Freedom of Information Act 2000
Reference FOI 24-0775
Housing Statistics

We are writing in response to your request for information received on 9 February 2024. Your request has been dealt with under the Freedom of Information Act 2000.

We have processed your request and your questions, together with our corresponding responses are as follows:

The below questions assume the most up to date housing completion metrics available are from April 2022 – March 2023, however if any data is collated based on a calendar year (i.e. Jan 2023 - Dec 2023) in any categories, please indicate where and include it below.

Where applicable, please input the data into the blank table provided. For some questions data has been requested which relates to 'Hellingly Parish' if data for this parish is not available, please provide the data for the smallest spatial geography which includes the village of Lower Horsebridge.

Housing Waiting List

1. *We note that in relation to the number of households on the Council's Housing Waiting List, the latest government Local Authority Housing Statistics 2022 - 2023 states the below. Please you could clarify in the blank table below whether this matches the most accurate and most up to date information held by the Council?*
Yes

If you have the below data with and without 'Transfer cases' (those currently in social housing who have been assessed as in need of moving) please can you provide it for both circumstances
Government Local Authority Housing Statistics 2022 – 2023



	<i>No. of Households</i>
<i>Total:</i>	743
<i>1 Bedroom</i>	342
<i>2 Bedroom</i>	242
<i>3 Bedroom</i>	126
<i>More than 3 Bedrooms</i>	33

Wealden District Council Housing Statistics 2022 – 2023

Wealden District Council does not record this information. We are therefore unable to answer your request as we do not hold the information.

2. *The average number of bids received for 1-bed, 2-bed, 3-bed and >3-bed homes for the years within the below table:*

Wealden District Council does not record this information. We are therefore unable to answer your request as we do not hold the information.

3. *If data for the timeframes as requested above (Question 2) is not available, then any data available for the numbers of bids received for 1-bed, 2-bed, 3-bed and >3-bed homes, and the corresponding time period i.e. lettings in the last week, the last month, the last quarter and so on*

We do not record the number of bids per bedroom need. We are therefore unable to answer your request as we do not hold the information

4. *The average waiting times reported at 1st April each year below for the following types of affordable homes across the District:*

	<i>Average Waiting Time</i>
<i>2021</i>	
<i>1 Bed</i>	8 months
<i>2 Bed</i>	9 months
<i>3 Bed</i>	10 months
<i>> 3 Bed Homes</i>	9 months
<i>2022</i>	
<i>1 Bed</i>	8 months
<i>2 Bed</i>	8 months
<i>3 Bed</i>	12 months
<i>> 3 Bed Homes</i>	19 months
<i>2023</i>	
<i>1 Bed</i>	10 months
<i>2 Bed</i>	9 months
<i>3 Bed</i>	13 months
<i>> 3 Bed Homes</i>	24 months

Temporary Accommodation

5. *The number of households on the Wealden District Council Housing Register housed in temporary accommodation inside and outside Wealden District Council boundary on 1st April of the following years.*

Wealden District Council does not record this information in the format requested. As such, we are unable to provide a break down between inside and outside – therefore the figures provided include both inside and outside.

	<i>Inside/Outside Wealden DC Boundary</i>
2013	13
2014	5
2015	16
2016	27
2017	45
2018	31
2019	10
2020	13
2021	7
2022	13
2023	43

Ownership Type

6. *What has been the total number of dwellings by ownership type (Local Authority owned / Registered Provider owned / Privately owned / Other ownership) in the Wealden District, per annum between 2013 and 2023.*

Wealden District Council does not record this information. We are therefore unable to answer your request as we do not hold the information.

7. *What has been the total number of dwellings by tenure / ownership type (Local Authority owned / Registered Provider owned / Privately owned / Other ownership) in the Hellingly Parish (or the smallest applicable geography to Lower Horsebridge), per annum between 2013 and 2023.*

Wealden District Council does not record this information. We are therefore unable to answer your request as we do not hold the information.

Social housing stock

8. *Please complete the table below to show the total number of social housing dwellings at 1st April of the following years within Wealden District*

Year	Total number of social housing dwellings
2013/14	5182
2014/15	5290
2015/16	5416
2016/17	5415
2017/18	5439
2018/19	5515
2019/20	5694
2020/21	5883
2021/22	6161
2022/23	6281
2023/24	Information not yet available

9. Please complete the table below to show the total number of social housing dwellings at 1st April of the following years within Hellingly Parish (or the smallest applicable geography to Lower Horsebridge)

Year	Total number of social housing dwellings in Hellingly Parish
2013	96
2014	96
2015	96
2016	96
2017	109
2018	109
2019	161
2020	203
2021	299
2022	315
2023	Information not yet available

10. Whether any part of the Local Authority's social housing dwelling stock has been transferred to another organisation or organisations. If so, when did the transfer(s) take place, and who was the recipient organisation.

Wealden District Council does not have access to this information. We are therefore unable to answer your request as we do not hold the information.

Social housing lettings

11. Please complete the table below to confirm the number of social lettings between 2013 and 2023 (per annum) within Wealden District.

<i>Year</i>	<i>Total number of social lettings</i>
2013	325
2014	428
2015	323
2016	320
2017	232
2018	315
2019	210
2020	319
2021	215
2022	208
2023	Information not yet available

12. Please complete the table below to show the total number of social housing dwellings at 1st April of the following years within Hellingly Parish (or the smallest applicable geography to Lower Horsebridge).

<i>Year</i>	<i>Total number of social housing lettings in Hellingly Parish</i>
2013/14	13
2014/15	1
2015/16	5
2016/17	7
2017/18	19
2018/19	5
2019/20	0
2020/21	1
2021/22	81
2022/23	0
2023/24	Information not yet available

Housing completions

15. Please confirm that the table below, represents the most up to date information held for full year net housing (Compiled from Wealden District Council's latest Authority Monitoring Report (AMR) (2022/23) (Appendix 1D)) and affordable housing (Compiled from AMRs 2013/14 – 2022/23) completions in the District to date.

<i>Year</i>	<i>WDC Average Housing Requirement</i>	<i>Net Housing Completions</i>	<i>Affordable Housing Completions (net or gross – delete as appropriate)</i>	<i>% of completions as AH</i>
2013-2014	450	560	201	35.8%
2014-2015	450	576	193	33.5%
2015-2016	450	520	82	15.7%
2016-2017	450	564	81	14.3%
2017-2018	450	462	144	31.1%

2018-2019	450	828	130	15.7%
2019-2020	450	1,034	273	26.4%
2020-2021	450	722	275	38%
2021-2022	450	685	176	26%
2022-2023	450	1,138	218	19%

16. We note that it is not clear within the Wealden District Council's Authority Monitoring Report's if the affordable housing completions data is Net or Gross Affordable Housing Completions. Please confirm the opposite type of (Gross / Net) affordable housing completions to those shown above for the whole District per annum since 2013, in the table below.

The figures provided are the number of affordable homes that completed in a financial year. A 'completion' is considered to be a unit handed over and ready to let.

Year	Total number of net / Gross affordable housing completions
2013	207
2014	193
2015	172
2016	83
2017	144
2018	141
2019	262
2020	275
2021	181
2022	218
2023	Information not yet available

17. Please provide the Net / Gross number of market and affordable homes completed in Hellingly Parish for the period 2013 – 2014, to 2022 – 2023 in the table below.

Monitoring period	Number of new market homes completed (Net / Gross)	Number of affordable homes completed (Net / Gross)
2013 - 2014	41 (Net)/ 41 (Gross)	32 (Net)/ 32 (Gross)
2014 - 2015	16 (Net)/ 16 (Gross)	0
2015 – 2016	47 (Net)/ 47 (Gross)	0
2016 – 2017	49 (Net)/ 56 (Gross)	22 (Net)/ 22 (Gross)
2017 – 2018	59 (Net)/ 59 (Gross)	24 (Net)/ 24 (Gross)
2018 – 2019	99 (Net)/ 99 (Gross)	13 (Net)/ 13 (Gross)
2019 – 2020	122 (Net)/ 122 (Gross)	95 (Net)/ 95 (Gross)
2020 – 2021	77 (Net)/ 77 (Gross)	41 (Net)/ 41 (Gross)
2021 – 2022	81 (Net)/ 81 (Gross)	55 (Net)/ 55 (Gross)
2022 - 2023	117 (Net)/ 117 (Gross)	44 (Net)/ 44 (Gross)

Housing Planning permissions

18. Please provide the net and gross number of market and affordable homes granted planning permission in Wealden District for the period 2013 – 2014, to 2022 – 2023 in the table below.

Monitoring period	Number of new market homes granted permission (net / gross)	Number of affordable homes granted permission (net / gross)
2013 - 2014	773 (Net)/ 781 (Gross)	458 (Net)/ 480 (Gross)
2014 - 2015	829 (Net)/ 849 (Gross)	415 (Net)/ 415 (Gross)
2015 – 2016	1,415 (Net)/ 1,435 (Gross)	660 (Net)/ 702 (Gross)
2016 – 2017	1,607 (Net)/ 1,654 (Gross)	626 (Net)/ 626 (Gross)
2017 – 2018	363 (Net)/ 408 (Gross)	29 (Net)/ 29 (Gross)
2018 – 2019	526 (Net)/ 541 (Gross)	199 (Net)/ 199 (Gross)
2019 – 2020	785 (Net)/ 795 (Gross)	309 (Net)/ 309 (Gross)
2020 – 2021	1,063 (Net)/ 1,072 (Gross)	508 (Net)/ 508 (Gross)
2021 – 2022	1,587 (Net), 1,602 (Gross)	585 (Net)/ 585 (Gross)
2022 - 2023	1,454 (Net), 1,465 (Gross)	704 (Net)/ 704 (Gross)

19. Please provide the Net / Gross number of market and affordable homes granted planning permission in Hellingly Parish for the period 2013 – 2014, to 2022 – 2023 in the table below.

Monitoring period	Number of new market homes granted permission (net / gross)	Number of affordable homes granted permission (net / gross)
2013 - 2014	148 (Net)/ 148 (Gross)	96 (Net)/ 96 (Gross)
2014 - 2015	493 (Net)/ 500 (Gross)	312 (Net)/ 312 (Gross)
2015 – 2016	22 (Net)/ 23 (Gross)	12 (Net)/ 12 (Gross)
2016 – 2017	19 (Net)/ 19 (Gross)	6 (Net)/ 6 (Gross)
2017 – 2018	18 (Net)/ 18 (Gross)	0
2018 – 2019	190 (Net)/ 190 (Gross)	90 (Net)/ 90 (Gross)
2019 – 2020	66 (Net)/ 66 (Gross)	21 (Net)/ 21 (Gross)
2020 – 2021	21 (Net)/ 22 (Gross)	61 (Net)/ 61 (Gross)
2021 – 2022	397 (Net)/ 397 (Gross)	188 (Net)/ 188 (Gross)
2022 - 2023	99 (Net)/ 100 (Gross)	43 (Net)/ 43 (Gross)

If you are unhappy with our handling of your request, you should first contact Wealden Information Governance to see if they can resolve your concerns by requesting an internal review.

All requests for an internal review will be dealt with under the Council's published [Internal Review Procedure](#). Having read our guidance, should you wish to proceed with a review, please set out the grounds of your complaint by emailing informationgovernance@wealden.gov.uk ensuring that you quote reference FOI 24-0775.

If you do not have access to email, you can make your request in writing to Information Governance, Wealden District Council, Vicarage Lane, Hailsham, BN27 2AX quoting reference FOI 24-0775.

If you are not content with the outcome of the internal review, you have the right to complain directly to the Information Commissioner whose contact details can be found on their website at <https://ico.org.uk/>.

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Yours sincerely,

Information Governance Team
Wealden District Council