

SB5

AFFORDABLE HOUSING NEED AND SUPPLY IN WEALDEN DISTRICT

June 2025

1.0 Introduction and Context

- 1.1. The Appeal Scheme proposes the on-site provision of up to 67 affordable dwellings¹, thus achieving a policy-compliant 35% affordable housing provision.
- 1.2. There is an acute need for affordable housing within the District, which is confirmed in recent appeal decisions.
- 1.3. Paragraph 22 of the Old Orchard House, Horebeech Lane, Horam appeal (Appeal Ref: APP/C1435/W/22/3297371, 4 Aug 2022) states:

"The 35% affordable housing provided would comply with CS Policy WCS8. The appellant's evidence over an acute need for affordable housing in Wealden, with affordability worsening, was not challenged. This is a specific social benefit to which I also attach very significant weight. Quite significant weight is attached to the provision of two plots for self-build homes, as this would help meet a demand for such opportunities." (My emphasis underlined)

- 1.4. In the appeal scheme for up to 58 dwellings on land at Old Nursery House, The Street, Framfield (Appeal Ref: App/C1435/W/22/3301104, 5 Jan 2023) the Inspector concluded on affordable housing matters at paragraph 68 as follows:

"In addition, the evidence before me shows that delivery of affordable housing in the district has been substantially below the level of identified need for at least the last few years, and the main parties agree that there is an acute need for more affordable homes in Wealden. The proposal includes 35% affordable housing which would provide for up to 20 affordable homes, and I afford substantial weight to this benefit. I also give significant weight to the provision for 5% of dwellings as self-build or custom-build which would contribute to meeting needs." (My emphasis underlined)

¹ Assuming 190 dwellings are built

- 1.5. Paragraphs 20 and 63 of the NPPF sets a strong emphasis on the delivery of sustainable development including affordable homes, whilst paragraph 61 clearly sets out the Government's aim to "boost significantly the supply of homes".
- 1.6. The need for affordable housing and their importance in achieving sustainable development is emphasised in many government publications, including House of Commons Committee of Public Accounts – Planning and the Broken Housing Market (19th June 2019).
- 1.7. The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent national planning policy, including the NPPF (2012, 2018, 2019, 2021, 2023 and 2024 versions).
- 1.8. The National Planning Policy Framework (NPPF) is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process. The NPPF sets a strong emphasis on the delivery of sustainable development, including affordable homes, at paragraphs 20 and 63.
- 1.9. The need for affordable housing and the importance of its provision is emphasised in many Government publications, including:
- Planning and the broken housing market, Committee of Public Accounts, House of Commons (June 2019)
 - Planning White Paper – August 2020
 - The publication of the revised NPPF in December 2024 as part of the wider Government objective of delivery 1.5 million new homes in the current Parliament. The accompanying Ministerial Statement on 12th December 2024 indicated "**We have taken wider steps to drive the reformed housebuilding industry we are committed to delivering - one that is more responsive to consumer needs, which places affordability at the heart of what it does, and which builds out faster.**"
 - The integral role of affordable housing in achieving the Government's objectives as outlined in the revised NPPF was re-affirmed through the commitment of investing ██████ in the new affordable housing programme as part of the Spending Review announcement on 11th June 2025. This investment of ██████ is referenced as the largest in a generation.

2.0 Affordable Housing in Wealden

Policy and Evidence Base

- 2.1. Policy AFH1 of the Affordable Housing Delivery Local Plan sets out a 35% affordable housing requirement on schemes of 5 or more dwellings.
- 2.2. The supporting text to Policy AFH1 (paragraph 2.2) notes that the Council's commissioned local housing needs survey in 2009 confirmed an annual need to 812 affordable homes.
- 2.3. Whilst the Wealden District SHMA (2016) identified an annual need for 331 affordable homes from 2013 to 2033, this is still a significant need as illustrated in the Council's achievement of delivery.
- 2.4. This is shown in Table 1 below, alongside the extent provision has achieved that assessed in the Council's more recent Local Housing Need Assessment (LHNA) (August 2021) which indicates that at least 519 affordable homes (social or affordable rent) are required annually 2019-39 (Table 7.16).
- 2.5. Paragraph 7.78 of the LHNA also indicates that there is a further net annual need for at least 193 affordable homes for ownership in the District. This is consequently a total annual need for 712 affordable homes. This is reflected in Table 1.

Affordable Housing Delivery

- 2.6. As indicated in Table 1 below, the Council has delivered 2,144 affordable homes in the period April 2013 to March 2024. This is equivalent to an average rate of 194.9 affordable dwellings per annum since 2013.

Table 1: Affordable Housing Completions compared to SHMA and LHNA

Year	Affordable Delivery ²	Compared to SHMA (2016)		Compared to LHNA (2021)	
		331dpa	Annual Shortfall	712dpa	Annual Shortfall
2013/14	201	331	-130		
2014/15	193	331	-138		
2015/16	82	331	-249		
2016/17	81	331	-250		
2017/18	144	331	-187		
2018/19	130	331	-201		
2019/20	273	331	-58	712	-439
2020/21	275	331	-56	712	-437
2021/22	176	331	-155	712	-536
2022/23	218	331	-113	712	-494
2023/24	371	331	40	712	-341
Total	2,144	3,641	-1,497	3,560	-2,247

2.7. The delivery of affordable housing falls considerably short of the 331dpa or 712dpa requirements in the SHMA or the LHNA.

2.8. In addition to the under-delivery of affordable housing compared to that assessed within the SHMA and LHNA, it is also necessary to consider how the District's housing waiting list has also been affected by the under-delivery of affordable homes. This is shown in Table 2 below.

Table 2: Extent of housing waiting list in Wealden District³

	1/4/15	1/4/16	1/4/17	1/4/18	1/4/19	1/4/20	1/4/21	1/4/22	1/4/23	1/4/24
Households on waiting list	1,012	962	1,013	794	671	796	629	552	743	1,071
Households in reasonable preference category	506	388	537	407	347	448	371	252	430	282
Homeless	51	58	51	20	0	5	11	13	25	137

2.9. The Council's housing waiting list; especially those in a reasonable preference category; can be compared with the delivery of affordable homes as indicated in the authority's monitoring reports (see Table 1).

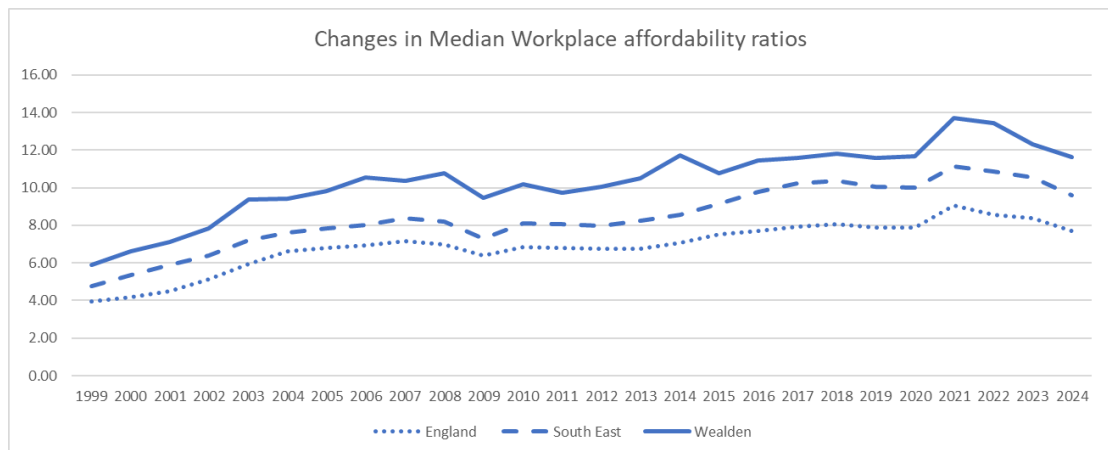
² Sourced from AMR (indicators 3B & 3C). This does not indicate any differentiation within the affordable tenure i.e. shared ownership or social rent.

³ Data from Government data with respect to Local authority housing information.

- 2.10. As Table 1 shows, the delivery of 2,144 affordable dwellings since April 2013 should be viewed in the context that this represents an under provision of 1,497 affordable dwellings as assessed by the SHMA to achieve the annual requirement of 331 affordable units.
- 2.11. It also represents an under provision of 2,247 affordable dwellings as assessed by the Wealden LHNA (2021) to achieve the minimum annual requirement of 721 affordable units.
- 2.12. On the basis of the available evidence, it is clear that there is a significant need for additional affordable homes and the delivery of affordable housing against the identified need has been woeful.
- 2.13. As the table above indicates, between April 2013 and March 2024, there has been a **cumulative under-delivery of 1,497 affordable dwellings** (when assessed against identified needs). This represents a 41% shortfall against assessed affordable housing needs during this period. Compared to the LHNA, there is a cumulative deficit of 2,247 dwellings (63.1% shortfall). These are very acute gaps in provision which affects Wealden District and how it functions in an economic, social and environmentally sustainable way.
- 2.14. On the basis of the available evidence, it is clear that there is a significant need for additional affordable homes and the delivery of affordable housing against the identified need has been woeful.
- 2.15. With its continued delays in delivery, this has the potential to make the situation even more severe not just for Wealden District's vulnerable position on affordable housing land supply, but for the significant number of households currently on the Council's Housing Register.
- 2.16. As at April 2024 there were 1,071 households on the Council housing register. Accordingly, it is evident that there is a significant need for additional affordable homes.
- 2.17. Paragraph 61 of the NPPF requires that needs of groups with specific housing requirements to be addressed. Paragraph 63 confirms that one of the specific groups relates to those requiring affordable housing.

Affordability Ratios

- 2.18. The continued under delivery of affordable housing, has contributed to the worsening of the affordability ratios in the District as indicated in the chart below:



- 2.19. The chart also shows that affordability ratios in Wealden District whilst have declined slightly from a peak of 13.7 in 2021 are still nearly doubled that from 1999 (5.88) in 2024 (11.62). The changes in affordability ratios in the District have mirrored those for England and the South East Region and have retained the divergence which has been apparent over the entire period.

- 2.20. This near doubling in the affordability ratio has occurred because of a failure to deliver sufficient homes to meet market and affordable need in the District. This is illustrated by the divergence of the affordability ratio for the district from those for both England and the Region. Consequently, it is essential that further increases in house building occurs to improve affordability, especially given the continual under-delivery in supply.

Future Affordable Housing Supply in Wealden

- 2.21. Although the Council publishes details of its planning commitments for housing, there is no information on the extent that those sites forming parts of its supply will deliver affordable housing to either address the current deficit of 1,497 affordable dwellings or ensure that this does not increase in the future.
- 2.22. The failure to meet the identified needs of affordable housing is a dire situation indicating that the Authority is not fulfilling the objectives in paragraph 61 of the NPPF.

- 2.23. A step change in the delivery of affordable housing is therefore required if the Council is to get anywhere near the identified need in the SHMA and begin to address the dysfunctions of the local housing market. Such a step change would be consistent with the thrust of paragraph 61 of the NPPF, to boost significantly the supply of housing.
- 2.24. The acute affordable housing need reinforces the merits of this Scheme with the on-site provision of 67 affordable dwellings⁴.
- 2.25. The Appellant considers substantial weight is attributable to the benefits associated with the provision of affordable housing.

⁴ Assuming 190 dwellings are built