

Affordable Housing Proof of Evidence of [REDACTED] MPlan MRTPI

Land North of Wilderness Lane, Great Barr

Affordable Housing Proof of Evidence of [REDACTED] MRTPI

Outline planning application (with the exception of access) for the development of up to 150 new dwellings (including 40% affordable housing), a countryside park and associated works

Land North of Wilderness Lane, Great Barr

Wain Estates (Land) Ltd

June 2024

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Appendices (bound separately)

- Appendix JRO1 [Freedom of Information Correspondence dated 18 April 2024 and 4 June 2024](#)
- Appendix JRO2 [Relevant Extracts from the Planning Practice Guidance](#)
- Appendix JRO3 [Independent Article on Right to Buy Sales, June 2020](#)
- Appendix JRO4 [Report to Cabinet, 26 February 2020: Housing Allocations Policy](#)

Core Document references

CD 2	The Development Plan and National Policy
CD 2.1	Black Country Core Strategy 2006 to 2026
CD 2.2	National Planning Policy Framework (December 2023)
CD 2.3	Planning Practice Guidance
CD 2.4	Site Allocations and Delivery Development Plan Document
CD 3	Emerging Development Plan
CD 3.1	Sandwell Local Plan - Regulation 18 Draft, November 2023
CD 4	Relevant Appeal Decisions
CD 4.3	Langton Road, Norton, Appeal Ref. 3136237 and 3136233, July 2016
CD 4.4	Land east of Park Lane, Coalpit Heath, South Gloucestershire, Appeal Ref. 3191477, September 2018
CD 4.5	North Worcestershire Gold Club Ltd, Hanging Lane, Birmingham, Appeal Ref. 3192918, July 2019
CD 4.7	Oxford Brookes University, Wheatley, Appeal Ref. 3230827, April 2020
CD 4.8	Land Off Bullens Green Lane, Colney Heath, Appeal Ref. 3265925, June 2021
CD 4.13	Land at Sondes Place Farm, Westcott Road, Dorking, Appeal Ref. 3324361, November 2023
CD 5	Relevant Correspondence
CD 5.1	Decision Notice, January 2024
CD 5.2	Delegated Officer Report, January 2024

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CD 6	Other Core Documents
CD 6.1	<i>'Big Plans for a Great Place: The Sandwell Plan' 2021 to 2025</i>
CD 6.4	Black Country and South Staffordshire Strategic Housing Market Assessment SHMA 2017 Part 2
CD 6.5	Black Country and South Staffordshire Strategic Housing Market Assessment SHMA 2021
CD 6.8	Homelessness and Rough Sleeping Strategy 2022 to 2024
CD 6.9	Housing Strategy 2023 to 2028
CD 6.11	LPA Statement of Case
CD 6.14	Regeneration Strategy 2022
CD 6.15	Sandwell Authority Monitoring Report 2021/22
CD 6.17	Strategic Housing Land Availability Assessment May 2024
CD 6.27	<i>'Bleak Houses: Tackling the Crisis of Family Homelessness in England'</i> ; Children's Commissioner, August 2019
CD 6.28	<i>'Denied the Right to a Safe Home – Exposing the Housing Emergency'</i> ; Shelter, May 2021

Executive Summary

1. This **Affordable Housing Proof of Evidence** has been prepared by [REDACTED] [REDACTED] **MPlan MRTPI** of Tetlow King Planning on behalf of the Appellant, Wain Estates (Land). It deals specifically with affordable housing and the weight to be attributed to it in this planning decision considering the evidence of need in Sandwell Metropolitan Borough and the Great Barr local area.
2. Outline planning permission (with all matters reserved except access) is sought for up to 150 dwellings, of which **40% or up to 60 dwellings will be affordable**. This represents **an 'enhanced' offer which exceeds the policy expectation for 25% affordable housing** as set out in Core Strategy Policy HOU3 'Delivering Affordable Housing'. In numerical terms, this is up to 22 dwellings more than that required by policy.

Affordable Housing as an Important Material Consideration

3. 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 retains an important role in national planning policy including the National Planning Policy Framework ("NPPF") and the Planning Practice Guidance ("PPG").

The Consequences of Failing to Meet Affordable Housing Needs

4. The consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:
 - a. A lack of financial security and stability;
 - b. Poor impacts on physical and mental health;
 - c. Decreased social mobility;
 - d. Negative impacts on children's education and development;
 - e. Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour, or those with substance abuse issues;
 - f. Being housed outside social support networks;

- g. Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
 - h. An increasing national housing benefit bill.
5. These harsh consequences on households, individuals and children unequivocally highlight the importance of meeting affordable housing needs. **These are real people in real need.** An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

The Development Plan and Related Policies

6. The relevant Development Plan Documents for Sandwell include the Black Country Core Strategy 2006 to 2026 (**CD 2.1**) and the Site Allocations and Delivery Development Plan Document (**CD 2.4**). Other material considerations include the NPPF (**CD 2.2**); the PPG (**CD 2.3**); the emerging Local Plan (**CD 3.1**) and a range of corporate documents produced by Sandwell MBC.

Black Country Core Strategy 2006 to 2026 (adopted 2011) (**CD 2.1**)

7. The adopted Core Strategy was prepared jointly between the four authorities of Dudley, Sandwell, Walsall and Wolverhampton, and covers a twenty-year plan period between 2006/07 and 2025/26.
8. The main policy for affordable housing in the Core Strategy is Policy HOU3 'Delivering Affordable Housing' at page 72, which identifies a minimum target of 11,000 gross new affordable homes between 2006/07 and 2025/26 across the four Black Country authorities (equivalent to 550 affordable dwellings per annum). **The policy seeks 25% affordable housing provision on qualifying sites of 15 dwellings or more**, where financially viable.

Site Allocations and Delivery Development Plan Document (adopted December 2012) (**CD 2.4**)

9. The Site Allocations and Delivery Development Plan Document (the "SAD") provides more detailed policies pursuant to the Core Strategy. SAD policy H3 'Affordable Housing' does not change the overall approach that is already set out in Core Strategy policy HOU3, but confirms that the size, type and tenure of affordable housing should follow the *"latest Housing Needs and Demands Study"*.

Emerging Sandwell Local Plan - Regulation 18 Draft (CD 3.1)

10. Sandwell MBC consulted on a 'Regulation 18' draft version of the Sandwell Local Plan between November and December 2023. The introductory chapters, vision and objectives recognise the importance of delivering affordable housing in the Borough.
11. Draft policy SHO4 'Affordable Housing' maintains the existing approach set out in Core Strategy Policy HO3 of seeking 25% affordable housing on qualifying sites of ten dwellings or more. In respect of tenure, draft policy SHO4 seeks 25% First Homes in line with national guidance, with the remaining affordable housing tenure split to be determined on a case-by-case basis.

Corporate Documents

12. A range of corporate documents prepared by Sandwell MBC identify **affordable housing as an important corporate priority for the Council**, including:
 - a. Sandwell Regeneration Strategy 2022 to 2027 (CD 6.14);
 - b. Sandwell Housing Strategy 2023 to 2028 (CD 6.9);
 - c. Sandwell Homelessness and Rough Sleeping Strategy 2022 to 2025 (CD 6.8);
and
 - d. 'Big Plans For A Great Place': The Sandwell Plan 2021 to 2025 (CD 6.1).

Affordable Housing Needs

13. Alongside the adopted Core Strategy policy HOU3 target for affordable housing delivery, it is also important to consider the objectively assessed need for affordable housing in Sandwell within recent Strategic Housing Market Assessments
 - a. The SHMA 2017 (CD 6.4) identified an objectively assessed need for 4,880 net affordable dwellings between 2011/12 and 2030/31 in Sandwell, which equates to **244 affordable dwellings per annum**.
 - b. The most recent assessment, the SHMA 2021 (CD 6.5), identified an objectively assessed need for 6,517 net affordable dwellings between 2020/21 and 2038/39 in Sandwell, which equates to **343 affordable dwellings per annum**.

Affordable Housing Delivery

14. The past record of affordable housing delivery in Sandwell reveals significant shortfalls in meeting identified needs across the Core Strategy period since 2006/07. This is exacerbated by the ongoing sale of affordable homes under the Right to Buy.

Gross Affordable Housing Delivery

15. Over the 17-year period between 2006/07 and 2022/23, a total of 11,698 dwellings were delivered in Sandwell, equivalent to 688 dwellings per annum. Of these, 3,697 dwellings were affordable tenures, equivalent to **217 gross affordable dwellings per annum**. This equates to **32% gross affordable housing delivery**.

Net Affordable Housing Delivery – Accounting for the Impact of the Right to Buy

16. The gross rate of affordable housing delivery does not reflect the amount of affordable housing that is available 'on the ground'. Homes sold under the Right to Buy are lost permanently from the affordable housing stock and can no longer be used to accommodate households in need. In Sandwell, the rate of Right to Buy sales is significant.
17. Between 2006/07 and 2022/23, 3,575 homes were sold from the Council's stock, a further 80 homes were sold from Registered Providers' stock, although 257 existing dwellings were purchased for use as affordable housing using Right to Buy receipts. This equals **an overall deduction of 3,398 affordable dwellings** over the 17-year period, which equates to **92% of the gross affordable housing completions of 3,697 affordable dwellings** over the period.
18. This means that **on average between 2006/07 and 2022/23, the Council has added just 18 affordable dwellings per annum, net of Right to Buy sales and associated acquisitions**, equivalent to 3% of the total average number of net housing completions.

Affordable Housing Delivery Compared to Affordable Housing Needs

SHMA 2017 – 244 dwellings per annum since 2011/12

19. Since the start of the SHMA 2017 period in 2011/12, net affordable housing additions have been negative, averaging -15 net affordable dwellings per annum, against a need of 244 net affordable dwellings per annum. **A shortfall of -3,107 affordable dwellings has accumulated over the 12-year period**, equivalent to an average annual shortfall of -259 affordable dwellings.

SHMA 2021 – 343 dwellings per annum since 2020/21

20. In the first three years of the SHMA 2021 period between 2020/21 and 2022/23, net affordable housing additions have been negative, averaging -11 net affordable dwellings per annum, against a need of 343 net affordable dwellings per annum. **A shortfall of -1,063 affordable dwellings has accumulated over the 3-year period so far**, equivalent to an average annual shortfall of -354 affordable dwellings.
21. It is clear that a 'step change' in affordable housing delivery is needed now in Sandwell to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.

The Future Supply of Affordable Housing

22. The future delivery of affordable housing is highly uncertain and the delivery of a higher number of affordable homes in one year obviously does not guarantee that this will continue for future years.
23. The Council's Strategic Housing Land Availability Assessment May 2024 (**CD 6.17**) sets out the Council's own assessment of its deliverable housing supply. It identifies a total supply of 2,607 homes over the five year period between 2023/24 and 2027/28.
24. When applying the rate of 32% gross affordable housing delivery to all 2,607 homes in the Council's trajectory, a total of **834 homes can be expected to be affordable**, which equates to **167 affordable dwellings per annum over the next five years**. This is some 50 dwellings fewer than the 217 affordable dwellings per annum that have been achieved on average over the Core Strategy period since 2006/07. Put another way, delivery is likely to reduce by just under a quarter.
25. It is important to account for potential Right to Buy losses and associated acquisitions. Overall, the Council is likely to lose 174 net affordable dwellings per annum through the Right to Buy and associated acquisitions.
26. The net position is therefore that the Council is likely to deliver 167 affordable dwellings per annum over the next five years, but will lose 174 affordable dwellings per annum through the Right to Buy, resulting in the **net loss of 7 affordable dwellings per annum between 2023/24 and 2027/28**. This is a bleak situation for anybody in housing need in the Borough who is potentially facing a diminishing housing stock.

Affordability Indicators

27. There is an increasing affordability challenge in Sandwell Metropolitan Borough. Whilst the cost of housing in Sandwell might generally be below that of the wider West Midlands region and of England as a whole, indicators are showing worsening affordability trends relative to the region and nation:
 - a. The **lower quartile affordability ratio in Sandwell now stands at 7.03**, a +44% increase since the post-recession period in 2014, and the highest ratio on record;
 - b. Lower quartile house prices in Sandwell now stand at £158,100, a +88% increase since 2014, and a faster rate of increase than in the West Midlands and in England as a whole;
 - c. Lower quartile private sector rents in Sandwell now stand at £625 per month, which is an increase of +£125 in the last three years, including two consecutive years where lower quartile rents increased by £50.
28. These worsening market signals show that it is becoming more challenging to afford a home to rent or to buy in Sandwell and in Great Barr.
29. Against this worsening backdrop, it is unsurprising that affordable housing in Sandwell is heavily oversubscribed:
 - a. There are a staggering **16,356 households on the Housing Register on 31 March 2024**;
 - b. Even successful applicants face **long average waits** for certain types of affordable homes – for example 103 weeks (almost 2 years) for a three-bedroom home in 2024;
 - c. Affordable homes in Great Barr attract **high numbers of bids** (as many as 213 bids for each three-bedroom home advertised) in the context of just 16 affordable housing lettings in 2023/24;
 - d. The use of temporary accommodation increased between 2023 and 2024 to **202 households**, of whom more than half (106 households) were placed outside the Borough; and
 - e. **1,251 households presenting to Sandwell MBC as either homeless, or facing imminent homelessness**, in 2022/23.

30. Sandwell Borough is experiencing **nothing short of a housing crisis** and that matters are only getting worse. Urgent action is therefore needed now to deliver more affordable homes.

The Benefits of the Proposed Affordable Housing

31. As the agreed Statement of Common Ground establishes, the proposed affordable housing represents a separate benefit to be weighed in the planning balance, in addition to the weight afforded to general housing provision.
32. The offer of 40% affordable housing exceeds the requirements of adopted Policy HOU3. Affordable housing policies are drafted to capture a benefit rather than to ward off harm or be needed in mitigation.

The Weight to be Attributed to the Proposed Affordable Housing

33. The Council's Officers' Report (**CD 5.2**) demonstrates very little engagement with the serious issues surrounding affordable housing in Sandwell, although the Council's Statement of Case goes on to confirm that *"It is common ground that the provision of market and affordable housing carry very substantial weight in the planning balance"* (my emphasis).
34. In my view, although the proposed 60 affordable dwellings might represent a small proportion of the accumulated housing shortfalls in Sandwell, the NPPF makes clear at paragraph 60 that *"The overall aim should be to meet as much of an area's identified housing need as possible"*. In this context, I consider that any progress is still valuable and that opportunities to get closer to meeting that need should be taken.
35. The present prospects for housing in Sandwell may be bleak but **every additional affordable home will help to alleviate some of the worst impacts of the housing crisis for a real household**. I am firmly of the view that **an affordable home can be transformative to the livelihoods and prospects of its occupants**.
36. Against the scale of the unmet need for affordable housing and Sandwell's housing crisis; and taking account of the 'enhanced' affordable housing offer which will secure 22 more affordable homes than the minimum required under policy; I consider that the proposed affordable housing should carry **very substantial weight** in the planning balance.

Introduction

Section 1

- 1.1 This **Affordable Housing Proof of Evidence** has been prepared by [REDACTED] **MPlan MRTPI** of Tetlow King Planning on behalf of the Appellant, Wain Estates (Land), in respect of the appeal reference APP/G4620/W/24/3341688 for residential development at Land north of Wilderness Lane, Great Barr.
- 1.2 Outline planning permission (with all matters reserved except access) is sought for up to 150 dwellings, of which **40% or up to 60 dwellings will be affordable**. The description of development as set out on the application forms and confirmed at the Case Management Conference is as follows:
- “Outline planning application (with the exception of access) for the development of up to 150 new dwellings, a countryside park and associated works.”*
- 1.3 For administrative purposes, the Local Planning Authority is Sandwell Metropolitan Borough Council (“Sandwell MBC” or “the Council”) within the West Midlands region. The appeal site is located within the Great Barr and Yew Tree council ward.
- 1.4 **The proposed 40% affordable housing represents an ‘enhanced’ offer** which exceeds the policy expectation for 25% affordable housing as set out in Policy HOU3 ‘Delivering Affordable Housing’ of the adopted Black Country Core Strategy (**CD 2.1**).
- 1.5 The proposed affordable housing will be secured through a Section 106 planning obligation. The mix of dwelling sizes, types and tenures will be confirmed at the reserved matters stage.
- 1.6 This Proof of Evidence deals specifically with affordable housing and the weight to be attributed to it in this planning decision considering the evidence of need in the area¹. It is particularly relevant to the Inspector’s Main Issue 5 (as set out after the Case Management Conference), namely *“whether harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify it”*.

¹ For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

1.7 My Proof of Evidence should be read alongside the evidence of:

- a. [REDACTED] of Turley (Planning);
- b. [REDACTED] of Turley (Housing Land Supply);
- c. [REDACTED] of FPCR (Ecology); and
- d. [REDACTED] of FPCR (Landscape).

1.8 My credentials as an expert witness are summarised as follows:

- a. I hold a Master of Planning (MPlan) degree in Urban Studies and Planning from the University of Sheffield (2013). I am a chartered member of the Royal Town Planning Institute.
- b. I have over ten years' professional experience in the field of town planning. I was first employed in 2013 at a national planning consultancy in the East of England. I joined Tetlow King Planning in 2019 and became an Associate in 2024.
- c. I have previously given evidence to inquiries and hearings as well as Local Plan examinations in recent years, throughout England, at which my evidence and methodology have been accepted and endorsed by Inspectors.
- d. I act for a range of clients including housebuilders, strategic land promoters, and housing associations. My work is primarily in the residential sector, with interests in matters of housing need and affordable housing.

1.9 In accordance with the Planning Inspectorate's Procedural Guidance, I declare that:

"The evidence which I have prepared and provide for this appeal reference APP/G4620/W/24/3341688 in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions."

1.10 I first became involved in this project in March 2020 when I advised the (then) applicant on affordable housing matters as they drafted their proposals for the proposed development. I provided more up-to-date information in 2022 which is referenced within the Planning Statement which accompanies the application.

- 1.11 It is a key priority of national planning policy to significantly boost the delivery of housing, and in particular affordable housing. This national policy imperative is set out in the latest version of the National Planning Policy Framework (**CD 2.2**), the Planning Practice Guidance (**CD 2.3**), the Government's National Housing Strategy 2011 "*Laying the Foundations: A Housing Strategy for England*" and the Government's Housing White Paper 2017 "*Fixing Our Broken Housing Market*". A thriving housing market that offers choice, flexibility and affordable housing is critical to our economic and social wellbeing.
- 1.12 In preparing this evidence, I place reliance on data sought from the Council through a Freedom of Information request made on 18 April 2024. A response was received on 4 June 2024. The full FoI correspondence can be found at **Appendix JRO1** to this Proof of Evidence.
- 1.13 This Proof of Evidence comprises the following nine sections:
- Section 2 establishes the importance of affordable housing as an important material consideration;
 - Section 3 considers the consequences of failing to deliver enough affordable housing;
 - Section 4 reviews the Development Plan and related policy framework including relevant corporate documents produced by Sandwell MBC;
 - Section 5 sets out the identified affordable housing needs in the Borough;
 - Section 6 examines past affordable housing delivery against identified needs;
 - Section 7 considers the future supply of affordable housing;
 - Section 8 covers a range of affordability indicators;
 - Section 9 identifies the benefits of the proposed affordable housing at the appeal site; and
 - Section 10 considers the weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF").

National Planning Policy Framework (19 December 2023) (CD 2.2)

- 2.2 The NPPF was last updated on 19 December 2023 and is a material planning consideration. It is important in setting out the role of affordable housing in the plan-making and decision-making processes.
- 2.3 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social dimension of sustainable development is to *"support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations"* (paragraph 8) (my emphasis).
- 2.4 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 60 is clear that:

"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed [...] The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community" (my emphasis).

- 2.5 Paragraph 63 also makes clear that *"within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing"* (my emphasis).

- 2.6 The national guidance places a corner-stone responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. In particular, paragraph 66 establishes that *“Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership”*.
- 2.7 Affordable housing is defined within the revised NPPF’s glossary as affordable housing for rent (in accordance with the Government’s rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents), starter homes, discounted market sales housing (at least 20% below market value) and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Planning Practice Guidance (March 2014, Ongoing Updates) (CD 2.3)

- 2.8 The Planning Practice Guidance (“PPG”) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application. **Appendix JRO2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

- 2.9 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority as set out in the National Housing Strategy and the Government’s Housing White Papers; it is a fundamental element in the drive to address and resolve the national housing crisis.

The Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

3.1 The National Housing Strategy sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.

3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply. Despite the debate taking place over a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Sandwell.

3.3 The former Planning Minister, [REDACTED], provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:

“I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”

3.4 When asked to clarify the word “crisis” by the Member for Tewkesbury, [REDACTED] commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. [REDACTED] commented on the geographical reach of the housing crisis, remarking that that the crisis *“is intense within the south-east and the south, but there are also pockets in parts of Yorkshire”*.

3.5 In response to questions, [REDACTED] reaffirmed that:

“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury [REDACTED] does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.

3.6 He went on to say:

“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”

3.7 Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

3.8 Mr Boles indicates that there are *“a lot of statistics to prove it”*. My evidence in subsequent sections sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now – if not worse – as it did in 2013.

Consequences of Failing to Meet Affordable Housing Need

3.9 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.

3.10 In August 2019 the Children’s Commissioner produced a report titled *“Bleak Houses: Tackling the Crisis of Family Homelessness in England”* (CD 6.27) to investigate the impact of homelessness and in particular the effect of this upon children.

3.11 The report identifies that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms. It states that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.

- 3.12 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are identified as being a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. The report states that *“Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work”*.
- 3.13 The report focuses on the effect on children. The report reveals that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a *“deeply disruptive impact on family life”*. This can include lack of support (for example, from grandparents) and travel costs.
- 3.14 It found that a child’s education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children’s educational development can also be delayed.
- 3.15 Temporary accommodation also presents serious risks to children’s health, wellbeing, and safety. This is particularly so for families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 3.16 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report finds (page 12) that denying children their right to adequate housing has a *“significant impact on many aspects of their lives”*.
- 3.17 More recently, in May 2021, Shelter published its report *“Denied the Right to a Safe Home – Exposing the Housing Emergency”* (CD 6.28) which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that *“we will only end the housing emergency by building affordable, good quality social homes”* (page 10).
- 3.18 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

“Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it’s damp, cramped, or away from jobs and support networks.” (page 5)

“... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option.” (page 5)

“The high cost of housing means the private-rented sector has doubled in size over the last 20 years [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability.” (page 6)

“If you live in an overcrowded home, you’re more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer.” (page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding.” (page 12)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%).” (page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn.” (page 25)

“Landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.” (page 29)

“The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing.” (page 30)

- 3.19 Shelter estimates that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (page 32).
- 3.20 The report concludes at page 33 that for change to happen, *“we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there’s only one way to end the housing emergency. Build more social housing”* (emphasis in original).

Summary and Conclusions

- 3.21 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:
- a. A lack of financial security and stability;
 - b. Poor impacts on physical and mental health;
 - c. Decreased social mobility;
 - d. Negative impacts on children’s education and development;
 - e. Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
 - f. Being housed outside social support networks;
 - g. Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
 - h. An increasing national housing benefit bill.
- 3.22 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.
- 3.23 I am strongly of the opinion that a step change in the delivery of affordable housing is needed now.

- 3.24 The acute level of affordable housing need in Sandwell coupled with worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

- 4.1 The relevant Development Plan Documents for Sandwell include the Black Country Core Strategy 2006 to 2026 (**CD 2.1**) and the Site Allocations and Delivery Development Plan Document (**CD 2.4**).
- 4.2 Other material considerations include the National Planning Policy Framework 2023 (the “NPPF”); the Planning Practice Guidance (the “PPG”); and a range of corporate documents produced by Sandwell MBC.
- 4.3 The Council is preparing a new Local Plan which reached the Regulation 18 draft consultation stage in late 2023; the emerging Local Plan and its evidence base are also material considerations.

The Development Plan

Black Country Core Strategy 2006 to 2026 (adopted 2011) (**CD 2.1**)

- 4.4 The adopted Core Strategy was prepared jointly between the four authorities of Dudley, Sandwell, Walsall and Wolverhampton, and covers a twenty-year plan period between 2006/07 and 2025/26.
- 4.5 Section 2 of the Core Strategy explains the overall vision for the Black Country area; at paragraph 2.2 at page 20, under the heading of ‘Sustainable Communities’, the Plan explains that it seeks to *“create a network of cohesive, healthy and prosperous communities across the Black Country, with equal access to a mix of affordable and aspirational housing”*.
- 4.6 Paragraph 2.3 at page 21 details five sustainability challenges for the Black Country area. Challenge 3 is titled ‘Social Inclusion’ and seeks to *“Ensur[e] all members of the community have the best possible access to facilities, housing and opportunities. It will be particularly important to ensure that people who suffer from social exclusion and disadvantage including the disabled are able to fully contribute to the regeneration of the Black Country”*.

- 4.7 The main policy for affordable housing in the Core Strategy is **Policy HOU3 ‘Delivering Affordable Housing’** at page 72, which identifies a minimum target of 11,000 new affordable homes between 2006/07 and 2025/26 across the four Black Country authorities (equivalent to 550 affordable dwellings per annum). The policy seeks 25% affordable housing provision on qualifying sites of 15 dwellings or more, where financially viable. The policy also details that the type and tenure of affordable housing to be sought will be based upon the best available information in respect of housing need, site surroundings and viability considerations.
- 4.8 The reasoned justification to the Policy at paragraph 3.14 (at page 72) explains that there is an affordability challenge in the Black Country, noting that *“whilst the current economic situation has impacted on house prices in recent times rising house prices and low average incomes have made market housing increasingly unaffordable for many Black Country households”* (my emphasis).
- 4.9 Paragraph 3.14 then discusses the extent of affordable housing need across the Black Country, explaining that *“the C3 Strategic Housing Market Assessment (SHMA) 2008 identified a significant need for affordable housing in the Black Country up to 2011 amounting to 3,125 units per year”* and that *“to meet this level of need over the Plan period 80% of new housing would have to be affordable”* (my emphasis).
- 4.10 Paragraph 3.15 explores some of the difficulties in meeting affordable housing need in the Black Country; it explains that details that whilst the then-extant Regional Spatial Strategy suggested a minimum affordable housing target of 29% of gross completions, it would not be achievable in the Black Country as *“even when residential values were at their peak, it has only been possible to secure, on average, half the target affordable housing”*.
- 4.11 In this context, paragraph 3.16 at page 73 explains that the Councils will seek to achieve 25% affordable housing in the first instance, and where a lesser proportion of affordable housing is agreed on viability grounds, that a claw-back mechanism is used in the event that development is more profitable than anticipated.
- 4.12 Paragraph 3.18 at page 73 explains the provenance of the 11,000 affordable dwelling target. This is based upon the availability of grant funding and the expectation that the prevailing rate of affordable housing completions since 2006 will continue to be achieved, based upon 15% of an estimated 72,450 gross completions across the Plan area over its full 20-year Plan period. I note that the evidence of Mr Armfield explains that the adopted Core Strategy requirement was based upon an assessment of capacity, rather than reflecting the extent of housing need.

- 4.13 Page 73 also includes the relevant monitoring indicator for affordable housing completions, which is “11000 [gross affordable housing completions] by 2026 (15% of target gross housing completions between 2006 and current year)”.
- 4.14 The monitoring framework is discussed at Section 9 of the Core Strategy; paragraph 9.2 at page 212 explains that the Councils will produce Annual Monitoring Reports against which performance will be monitored.
- 4.15 I note that the Council’s Authority Monitoring Report 2021/22 (the “AMR”; **CD 6.15**) monitors performance against Sandwell’s portion of the 11,000 gross affordable dwellings, which equates to 3,933 dwellings across the full twenty-year period, or 196 affordable dwellings per annum.

Site Allocations and Delivery Development Plan Document (adopted December 2012)
(CD 2.4)

- 4.16 The Site Allocations and Delivery Development Plan Document (the “SAD”) makes site-specific allocations and provides detailed development management policies, pursuant to the broader strategic policies contained in the Core Strategy.
- 4.17 In introducing the SAD’s housing policies, paragraph 4.3 at page 11 highlights the affordability challenge in Sandwell as was the case in 2012; it notes that even though house prices had fallen slightly since 2006, it remained difficult for many households to raise a deposit or to afford to rent in the private sector:

“Between 2006 – 2010, property prices in Sandwell have decreased by around 1.4% and sales of new homes have varied up and down over the last three years. Most notably 94% of newly formed households do not have enough of a deposit to buy a house and 40% of these cannot afford to rent properties in the private sector. This is having an increased impact on the need for affordable homes in the Borough.”

- 4.18 **SAD policy H3 ‘Affordable Housing’** at page 14 does not change the overall approach that is already set out in Core Strategy policy HOU3, but confirms that the size, type and tenure of affordable housing should follow the “*latest Housing Needs and Demands Study*”.

- 4.19 Monitoring Indicator COI HOU3 for Gross Affordable Housing Completions is set out at page 14, and sets a target of 25% of all housing completions on eligible sites. This differs slightly from the target in the Core Strategy (15% across all housing completions) although I note that the Council's AMR does not measure performance against this target.

Other Material Considerations

Emerging Sandwell Local Plan (CD 3.1)

- 4.20 The Council consulted on a 'Regulation 18' draft version of the Sandwell Local Plan between November and December 2023.
- 4.21 Paragraph 21 of the Introduction explains the need for a new Local Plan in the face of a growing population and the inability of the existing Core Strategy to address this, explaining that *"The most immediate issues both Sandwell and the Black Country are facing is that both their population and economy are continuing to grow and as a result there is a need to identify additional housing and employment sites. This demand is now beyond the capacity of the existing Strategy to address"*.
- 4.22 Section 1 of the Draft Local Plan sets out the wider vision, priorities and objectives that the Local Plan intends to achieve. The 2030 Vision for the Borough at paragraph 1.2 highlights the importance of having a place to call home:
- "It's where we call home and where we're proud to belong - where we choose to bring up our families, where we feel safe and cared for, enjoying good health, rewarding work, feeling connected and valued in our neighbourhoods and communities, confident in the future, and benefiting fully from a revitalised West Midlands."*
- 4.23 Ambition 4 sets out the intention to deliver 'many' new homes to meet what is described as a 'full range of housing needs', stating the aim that *"We now have many new homes to meet a full range of housing needs in attractive neighbourhoods and close to key transport routes"* and noting the role of the Local Plan in *"supporting the creation of additional affordable and sustainable communities"* in achieving this ambition.

- 4.24 The vision for 2041 is set out at paragraph 1.4 and again emphasises the role of affordable housing in achieving this:

“There is a wide range of housing available to Sandwell residents, aiming to help meet housing needs, designed to support green living and suitable for adaptation to benefit all sections of the community. Affordable, social and local authority-provided homes are available to those who need them.”

- 4.25 Objective 6 for the Local Plan is linked to this theme, which is to “Address Sandwell’s identified and wide-ranging housing needs by supporting the provision of high-quality new homes”.

- 4.26 Chapter 7 ‘Sandwell’s Housing’ addresses the key issues relating to housing and affordable housing in the Borough. **Draft policy SHO4 ‘Affordable Housing’** maintains the existing approach set out in Core Strategy Policy HO3 of seeking 25% affordable housing on qualifying sites of ten dwellings or more. In respect of tenure, draft policy SHO4 seeks 25% First Homes in line with national guidance, with the remaining affordable housing tenure split to be determined on a case-by-case basis (in a similar fashion to existing SAD policy H3).

- 4.27 The supporting text for draft policy SHO4 acknowledges the scale of housing need in the Borough and the context of worsening affordability. Paragraph 7.25 states:

“Rising house prices and low average incomes over a long period have made market housing increasingly unaffordable for many Sandwell households. The Black Country HMA (2021) identifies a requirement for 16.9% of new homes to be made available for affordable or social rent, 7% to be shared ownership and 8.2% to be First Homes. To meet this level of need over the Plan period, 32.1% of new housing would have to be affordable. Sandwell aspires to provide this level of affordable housing, through a range of schemes delivering up to 100% affordable housing funded through grant and other financial sources and supported by developer contributions where viable.”

- 4.28 The proposed monitoring framework is set out in the Delivery, Monitoring and Implementation section of the draft Local Plan. It intends to monitor ‘net affordable units completed’ against a target of ‘25% on eligible sites’.

Corporate Documents

Sandwell Regeneration Strategy 2022 to 2027 (CD 6.14)

- 4.29 The Sandwell Regeneration Strategy sets out the Council's ambitions for the regeneration of the Borough across a range of environmental, social and economic matters.
- 4.30 The Strategy outlines on page 9 that the Council is *"Faced with a high level of housing need"* and that Sandwell MBC has *"focused on increasing the level of affordable housing across the borough"*.
- 4.31 Page 14 of the Strategy outlines the five-year ambition for housing of to *"Facilitate and deliver more new homes and more affordable housing across the borough, faster"*.
- 4.32 Section 7 'Housing' at page 22 of the Strategy expands on this theme, with the Council adding *"We aim to improve our existing homes whilst increasing the amount of affordable housing in Sandwell, which includes a mix of private, shared ownership, social rented and affordable rented housing tenures"* (my emphasis).
- 4.33 Page 22 continues, stating that *"Much of our local demand is for affordable homes"* and *"Affordable housing needs have increased in recent years along with overall demand"*. I summarise the latest evidence of affordable housing need in Section 5 of this Proof of Evidence.
- 4.34 Furthermore, page 22 highlights lengthy waiting times and a diminishing affordable housing stock, noting that *"the average wait for a house is 1 year and 9 months and overall social housing stock has declined in the past 30 years. We aim to do more to provide our residents with access to affordable accommodation"* (my emphasis).
- 4.35 Page 24 of the Strategy outlines the Council's actions, with page 24 outlining that Sandwell will *"Use the council's position and powers to unlock sites attractive to investment and to uphold quality"* to *"Progress the case for a social housing programme to support the delivery of affordable housing"*.
- 4.36 Page 50 of the Strategy outlines ways in which the Council will measure their success. It adds that by 2027, the Council will have *"Increased the number of new homes, including affordable homes"*.

Sandwell Housing Strategy 2023 to 2028 (CD 6.9)

- 4.37 The Sandwell Housing Strategy outlines how the Council intends to provide housing that meets the needs of the Borough and its residents. The Foreword of the Strategy, by Councillor Laura Rollins, the Cabinet Member for Housing and the Built Environment, states that *“Not everyone in Sandwell can access affordable, secure, sustainable and good quality housing and yet this is central to residents being able to live prosperous, healthy and happy lives”* (my emphasis).
- 4.38 The Foreword also adds that the Council *“will work in partnership with housing associations, developers and others to tackle the shortage of affordable housing”*.
- 4.39 The Executive Summary on page 1 highlights some of the challenges for housing in the Borough, stating that *“The borough has lower than average levels of owner occupation, a large but dwindling stock of local authority housing and a growing but unaffordable private rented sector”*. This section of the Strategy also identifies *“five key priorities for action”*, with the first of these outlined as *‘providing more affordable homes’*.
- 4.40 Priority 1 ‘Providing more affordable homes’ is expanded on at page 7 with the Strategy, highlighting the affordability challenges in the Borough. It notes that while property values in Sandwell may be low in comparison with the West Midlands, they remain *“outside the reach of many households living locally”*. It further highlights a lengthy housing register and waiting times, and a rising need for affordable homes (I discuss the findings of the latest assessments in more detail at Section 5 of this Proof of Evidence).
- 4.41 Page 8 adds that *“there is also a substantial need for social and affordable rented properties for those that cannot afford to own their own home”*. The Strategy continues on page 8, adding that *“needs for low-cost affordable rental homes remain high and we will continue to focus on this tenure within our council house building programme”*.
- 4.42 Page 9 of the Strategy sets out that by the end of the strategy period, the Council aims to have:
- *“Increased the delivery of new build council homes to 100 - 150 per annum”;*
 - *“Increased the amount and diversity of affordable housing”;*
 - *“Delivered a balanced mix of affordable housing sizes, types and tenures”;*

- *“Delivered housing that meets the needs of specific, vulnerable groups and helps to address inequalities in housing provision”; and*
- *“Improved access to affordable housing for essential keyworkers”.*

4.43 Furthermore, page 11 of the Strategy highlights that *“the majority of private rented housing is supplied at an unaffordable cost for many within the borough”.*

4.44 Page 13 of the Strategy highlights the rising proportion of housing that is in the private rented sector (which I discuss at Section 8 of this Proof of Evidence), and states that the Council is *“committed to working with landlords and tenants to ensure private rented housing is accessible, secure, affordable and good quality”.* It however notes that *“a proportion of the private sector housing stock in Sandwell is of poor quality in terms of energy efficiency”.*

Sandwell Homelessness and Rough Sleeping Strategy 2022 to 2025 (CD 6.8)

4.45 The Homelessness and Rough Sleeping Strategy sets out how the Council aims to *“prevent homelessness and to ensure that support and accommodation will be available for people who are either at risk of losing their home or have lost their home”.* It focuses on homelessness but recognises the importance of housing affordability and availability in addressing this.

4.46 Page 5 of the Strategy notes the ongoing structural changes in Sandwell’s housing market, stating that *“In recent years the private rental market has expanded greatly whilst the local authority sector, once the numerically highest sector, continues to decline in number”.* It further notes that 47% of all private tenancies in Sandwell are supported by Housing Benefit, and it goes on to state that *“Affordability remains an issue in Sandwell”.*

4.47 Page 12 of the Strategy outlines a vision of *“To prevent homelessness and rough sleeping and where people find themselves homeless, ensure that we can resolve their housing need through a range of suitable and sustainable housing options”.*

‘Big Plans For A Great Place’: The Sandwell Plan 2021 to 2025 (CD 6.1)

4.48 The Sandwell Corporate Plan sets out what the Council will do to deliver its Vision 2030 and ten associated ambitions over the next five years. The Plan outlines six outcomes for the Borough, which include *“Strong, resilient communities”* and *“Quality homes in thriving neighbourhoods”.*

- 4.49 Page 33 of the document states that *“By 2030, we aim to have 8,000 more new homes in the borough. This will be a mix of council house building and homes built by registered housing providers and the private sector”*.
- 4.50 Page 33 of the plan adds that *“More than 4,000 Sandwell families or individuals declared themselves homeless in 2020/21”*.
- 4.51 Page 34 of the Plan highlights policy H1, adding that the Council *“will deliver much needed new homes across the borough, especially affordable homes, on our own land and other viable sites in order to help meet the demand for affordable housing in our communities”* (my emphasis).
- 4.52 Page 34 goes on to highlight policy H3, stating that the Council *“will help keyworkers to access affordable housing in order that Sandwell can attract and retain a strong local health and social care workforce for the benefit of our communities”*.

Conclusions on the Development Plan and Related Policies

- 4.53 There is a wide range of Sandwell MBC documents that clearly highlight the need for more affordable housing within the authority area to address the existing housing issues within Sandwell. In addition to which, the delivery of affordable homes has been a long-standing corporate priority of the Council.

Affordable Housing Needs

Section 5

The Development Plan

- 5.1 The adopted Black Country Core Strategy does not define a numerical target for the provision of affordable homes on a disaggregated basis by local authority, instead its policy HOU3 provides a minimum target of 11,000 gross affordable homes across the four authority areas (Dudley, Sandwell, Walsall and Wolverhampton) over the twenty year Core Strategy period from 2006/07 to 2025/26. This equates to an annual target of 550 affordable dwellings per annum across the four authority areas.
- 5.2 As I set out in the preceding section of this Proof of Evidence, the Council's AMR (CD 6.15) at page 22 identifies that the affordable housing monitoring target for Sandwell (based upon 3,933 of the overall target of 11,000 affordable dwellings across the Plan area being required for Sandwell) equates to an average of 196 gross affordable homes per annum.
- 5.3 It is also important to consider the objectively assessed need for affordable housing in Sandwell within recent Strategic Housing Market Assessments. Whilst this has not been formally tested at Examination, it represents the most up to date position.

Housing Market Assessments

- 5.4 The adopted Core Strategy was informed by the '*Strategic Housing Market Assessment for the C3 Housing Market Area of the West Midlands*' which was undertaken in 2008 by Ecotec and covered the four Black Country authorities, as well as neighbouring Cannock Chase, South Staffordshire, and Telford & Wrekin authority areas. Given that this document is now some 16 years old, I consider it is more relevant to consider the two more recent Strategic Housing Market Assessments that have been undertaken since 2017. These are summarised in turn below.

Black Country and South Staffordshire Strategic Housing Market Assessment SHMA 2017 Part 2 (CD 6.4)

- 5.5 The Black Country and South Staffordshire Strategic Housing Market Assessment SHMA 2017 (the “SHMA 2017”) was published in March 2017 and was prepared by Peter Brett Associates and HDH Planning & Development Ltd. It covers the twenty-year period from 2011/12 to 2030/31.
- 5.6 At appendix 5, the SHMA 2017 provides local authority specific affordable housing need figures. Table 5.10b at page 162 shows that for Sandwell, based upon households being able to afford 30% of their gross household income on rent and assuming that the backlog of affordable housing need is cleared over the 20-year period, an annual need for 244 net affordable homes is identified between 2011 and 2031.

Black Country and South Staffordshire Strategic Housing Market Assessment SHMA 2021 (CD 6.5)

- 5.7 The Black Country and South Staffordshire Strategic Housing Market Assessment SHMA 2021 (“SHMA 2021”) was published in March 2021 by HDH Planning & Development Ltd. This document informs the preparation of the emerging Local Plan and is referred to in the Council’s Housing Strategy 2023 to 2028 (**CD 6.9**).
- 5.8 Table 6.1b at page 166 identifies a total affordable housing need for 6,517 affordable dwellings in the Sandwell District area between 2020/21 and 2038/39, which equates to 343 affordable dwellings per annum during the 19-year period. As with the preceding SHMA 2017, this affordable housing need figure is based upon households being able to afford 30% of gross household income on rent, and assuming that the backlog is cleared over the 19 year period.

Conclusions on Affordable Housing Needs

- 5.9 The SHMA 2017 identified an objectively assessed need for 4,880 net affordable dwellings between 2011/12 and 2030/31 in Sandwell, which equates to **244 affordable dwellings per annum**.
- 5.10 The most recent assessment, the SHMA 2021, identified an objectively assessed need for 6,517 net affordable dwellings between 2020/21 and 2038/39 in Sandwell, which equates to **343 affordable dwellings per annum**.

Affordable Housing Delivery

Section 6

- 6.1 This section of the evidence analyses the delivery of affordable housing in Sandwell. It highlights significant shortfalls in meeting identified needs, exacerbated by the ongoing sale of existing affordable homes under the Right to Buy, illustrating a pressing need for a substantial increase in affordable housing provision across the Borough.

Past Affordable Housing Delivery

- 6.2 Figure 6.1 below illustrates the delivery of affordable housing ("AH") in Sandwell Borough over the 17-year period since the start of the Core Strategy period in 2006/07, as set out in the Council's AMR 2021/22 (unless otherwise stated).

Figure 6.1: Gross Additions to Affordable Housing Stock, 2006/07 to 2022/23

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2006/07	1,162	222	19%
2007/08	1,136	195	17%
2008/09	450	187	46%
2009/10	505	292	58%
2010/11	549	286	52%
2011/12	599	394	66%
2012/13	712	323	45%
2013/14	536	330	62%
2014/15	961	258	27%
2015/16	561	329	59%
2016/17	901	29	3%
2017/18	676	117	17%
2018/19	794	93	12%
2019/20	501	107	21%
2020/21	654	162	25%
2021/22	661	250	38%
2022/23	340*	123*	36%
Total	11,698	3,697	32%
Average	688	217	32%

Sources: AMR 2021/22 (CD 6.9) for monitoring years 2006/07 to 2021/22, * DLUHC for monitoring year 2022/23

- 6.3 Between 2006/07 and 2022/23, a total of 11,698 dwellings were delivered in Sandwell, equivalent to 688 dwellings per annum. Of these, 3,697 dwellings were affordable tenures, equivalent to 217 affordable dwellings per annum. This equates to 32% gross affordable housing delivery, which exceeds the 15% target that is set out in the Core Strategy's monitoring framework.
- 6.4 I would note that this performance across the Core Strategy period has been somewhat 'flattered' by stronger rates of until around 2015/16 after which lower rates have typically been achieved.
- 6.5 I would also note that, in the context of overall housing delivery, the achievement of 32% gross affordable housing additions is below what might have been expected had the targets for overall housing provision been met. Sandwell's total housing requirement in the Core Strategy between 2006/07 and 2022/23 (i.e. the planned level of growth that the Core Strategy was expected to achieve) was 17,184 homes (based on an annualised 1,074 dwellings per annum). The gross supply of 3,697 homes over the same period equates to just 21% of the planned level of growth.

Accounting for the Impact of the Right to Buy

- 6.6 It is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through Right to Buy ("RtB") sales from existing Council and Registered Provider² ("RP") affordable housing stock. Homes sold under the Right to Buy are lost permanently from the affordable housing stock and can no longer be used to accommodate households in need.
- 6.7 It is important to note that Councils are able to use a portion of retained receipts from Right to Buy sales to fund the purchase of existing dwellings for use as affordable housing, which can be added back into the affordable housing stock and offset a proportion of these losses.
- 6.8 Figure 6.2 below calculates the affordable housing delivery per annum over the 17 years since the start of the Core Strategy period in 2006/07, net of Right to Buy sales. The sale of 3,398³ affordable dwellings over this period equates to 92% of the gross affordable housing completions of 3,697 affordable dwellings over the 17-year period.

² RtB data on RP sales of affordable housing to RP tenants is contained in the annual Statistical Data Returns ('SDR') data sets for the period 2011/12 to 2021/22 published by the Regulator of Social Housing. These figures have been combined on an annual basis to produce total Right to Buy sales.

³ 3,575 sales from local authority stock + 80 sales from Registered Providers' stock – 257 acquisitions = 3,398 dwellings

Figure 6.2: Calculation of Net Additions to Affordable Housing Stock, 2006/07 to 2022/23

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	Local Authority Acquisitions	Local Authority RtB sales	Registered Provider RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	A	B	C	D	E	F (B + C) - (D + E)	G (F ÷ A) × 100
2006/07	1,162	222	n/a	304	n/a	-82	-7%
2007/08	1136	195	n/a	213	n/a	-18	-2%
2008/09	450	187	n/a	91	n/a	96	21%
2009/10	505	292	n/a	42	n/a	250	50%
2010/11	549	286	n/a	54	n/a	232	42%
2011/12	599	394	n/a	77	0	317	53%
2012/13	712	323	n/a	184	2	137	19%
2013/14	536	330	n/a	274	4	52	10%
2014/15	961	258	n/a	256	4	-2	0%
2015/16	561	329	n/a	228	2	99	18%
2016/17	901	29	n/a	264	2	-237	-26%
2017/18	676	117	38	296	1	-142	-21%
2018/19	794	93	0	283	4	-194	-24%
2019/20	501	107	43	281	44	-175	-35%
2020/21	654	162	82	176	8	60	9%
2021/22	661	250	80	288	5	37	6%
2022/23	340*	123*	14	264	4	-131	-39%
Total	11,698	3,697	257	3,575	80	299	3%
Average	688	217	43	210	7	18	3%

Sources: See Figure 6.1 for completions data; DLUHC for local authority Right to Buy sales and acquisitions; Registered Provider Statistical Data Returns for RP Right to Buy sales.

- 6.9 Figure 6.2 demonstrates that on average **between 2006/07 and 2022/23, the Council has added just 18 affordable dwellings per annum, net of Right to Buy sales and associated acquisitions**, equivalent to 3% of the total average number of net housing completions.
- 6.10 The above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Sandwell faster than the replacements from acquisitions.
- 6.11 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal in another West Midlands authority, at land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019 (**CD 4.5**). Paragraph 14.108 of the Inspector's Report summarises the Inspector's comments on the evidence of my colleague at Tetlow King Planning, and sets out that:
- “Mr Stacey’s unchallenged evidence shows that only 2,757 new affordable homes were provided in the City over the first 6 years of the plan period. This represents less than half of the target provision and a net increase of only 151 affordable homes if Right to Buy sales are taken into account. On either measure there has been a very low level of provision against a background of a pressing and growing need for new affordable homes in Birmingham” (my emphasis).*
- 6.12 The seriousness of the impact was considered in an article in the Independent newspaper in June 2020 which is attached at **Appendix JRO3**.
- 6.13 The article reports that *“Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show”*. It goes on to discuss the national picture, explaining that *“Housing charities warned that enough “desperately needed” genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show”*.

- 6.14 The article goes on to quote [REDACTED], who was the chief executive at homelessness charity Crisis at the time. He remarked that *“These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision.”*
- 6.15 The article also notes that a significant proportion of homes sold under the Right to Buy (for instance, around 40% of apartments) have gone on to be let in the private rented sector – in other words, what was once affordable housing is now being let out at full market rates. The article notes that *“Previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London”.*
- 6.16 It is important, therefore, that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account to reflect the actual level of affordable houses available.
- 6.17 I note that the Core Strategy and its monitoring framework only reflect the gross delivery of affordable housing, before accounting for any Right to Buy sales and associated acquisitions, and they do not reflect the situation ‘on the ground’ where the affordable housing stock is diminishing (a point acknowledged in the Council’s Homelessness and Rough Sleeping Strategy).
- 6.18 The comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of my subsequent analysis, I use the net affordable housing completions calculated in Figure 6.2 above, which take account of the Right to Buy losses and associated re-sales.

Affordable Housing Delivery Compared to Affordable Housing Needs

SHMA 2017

- 6.19 Figure 6.3 illustrates net affordable housing delivery compared to the affordable housing need of 244 net affordable dwellings per annum between 2011/12 and 2030/31, as identified in the SHMA 2017.

Figure 6.3: Net Additions to Affordable Housing Stock Compared to Needs Identified in the SHMA 2017 from 2011/12 to 2022/23

Monitoring Period	Additions to AH Stock (Net of RtB)	SHMA 2017 AH Needs Per Annum	Annual Surplus / Shortfall	Cumulative Surplus / Shortfall	Additions as a %age of Needs
2011/12	317	244	+73	+73	130%
2012/13	137	244	-107	-34	56%
2013/14	52	244	-192	-226	21%
2014/15	-2	244	-246	-472	-1%
2015/16	99	244	-145	-617	41%
2016/17	-237	244	-481	-1,098	-97%
2017/18	-142	244	-386	-1,484	-58%
2018/19	-194	244	-438	-1,922	-80%
2019/20	-175	244	-419	-2,341	-72%
2020/21	60	244	-184	-2,525	25%
2021/22	37	244	-207	-2,732	15%
2022/23	-131*	244	-375	-3,107	-54%
Total	-179	2,928	-3,107	-3,107	-6%
Average	-15	244	-259	-259	-6%

Source: AMR 2006/07 to 2021/22, DLUHC 2022/23*

6.20 Since the start of the SHMA 2017 period in 2011/12, net affordable housing additions have been negative, averaging -15 net affordable dwellings per annum, against a need of 244 net affordable dwellings per annum. A shortfall of -3,107 affordable dwellings has accumulated over the 12-year period, equivalent to an average annual shortfall of -259 affordable dwellings.

6.21 As demonstrated by Figure 6.3, the net loss of -179 affordable homes (after accounting for the impact of the Right to Buy) over the period means that none of the identified affordable housing needs were met.

SHMA 2021

6.22 As previously highlighted, the SHMA 2021 identifies a need for 343 net affordable dwellings per annum in Sandwell Borough between 2020/21 and 2038/39.

Figure 6.4: Net Additions to Affordable Housing Stock Compared to Needs Identified in the SHMA 2021 from 2020/21 to 2022/23

Monitoring Period	Additions to AH Stock (Net of RtB)	SHMA 2021 AH Needs Per Annum	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	60	343	-283	-283	17%
2021/22	37	343	-306	-589	11%
2022/23	-131	343	-474	-1,063	-38%
Total	-34	1,029	-1,063	-1,063	-3%
Average	-11	343	-354	-354	-3%

Source: AMR 2020/21 to 2021/22, DLUHC 2022/23*

- 6.23 In the first three years of the SHMA 2021 period between 2020/21 and 2022/23, net affordable housing additions have been negative, averaging -11 net affordable dwellings per annum, against a need of 343 net affordable dwellings per annum. **A shortfall of -1,063 affordable dwellings has accumulated over the 3-year period so far, equivalent to an average annual shortfall of -354 affordable dwellings.**
- 6.24 As demonstrated by Figure 6.4, the net loss of -34 affordable homes (after accounting for the impact of the Right to Buy) over the period means that none of the identified affordable housing needs were met.

Affordable Housing Delivery in Great Barr and Yew Tree Ward

- 6.25 Figure 6.5 overleaf illustrates the delivery of affordable housing (“AH”) in Great Barr and Yew Tree ward over the 17-year period since the start of the Core Strategy period in 2006/07.

Figure 6.5: Gross Additions to Affordable Housing Stock, Great Barr with Yew Tree Ward, 2006/07 to 2022/23

Monitoring Period	Total Housing Completions (Net) Great Barr with Yew Tree Ward	Additions to AH Stock (Gross) Great Barr with Yew Tree Ward	Gross AH as a %age of total completions
2006/07	12	0	0%
2007/08	16	0	0%
2008/09	1	0	0%
2009/10	1	0	0%
2010/11	0	0	0%
2011/12	25	10	40%
2012/13	26	25	96%
2013/14	7	0	0%
2014/15	47	8	17%
2015/16	34	6	18%
2016/17	28	12	43%
2017/18	9	0	0%
2018/19	0	0	0%
2019/20	8	8	100%
2020/21	45	39	87%
2021/22	0	0	0%
2022/23	0	0	0%
Total	259	108	42%
Average	15	6	42%

Source: Freedom of Information Response dated 4 June 2024

- 6.26 Between 2006/07 and 2022/23, a total of 259 dwellings were delivered in Great Barr with Yew Tree ward, equivalent to 15 dwellings per annum. Of these, 108 dwellings were affordable tenures, equivalent to 6 affordable dwellings per annum. This equates to 42% gross affordable housing delivery, which exceeds the 32% delivery across the Borough, although this is calculated based upon a relatively small number of dwellings.
- 6.27 The completions data in Figure 6.5 above is calculated on a gross basis and does not account for Right to Buy sales.

Conclusions on Affordable Housing Delivery

- 6.28 The above evidence demonstrates that across Sandwell, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 6.29 In the 17-year period since the start of the Core Strategy period in 2006/07, net of Right to Buy affordable housing delivery represented just 3% of overall housing delivery, equating to just 18 affordable dwellings per annum.
- 6.30 A shortfall of -3,107 dwellings has arisen against the SHMA 2017, which identifies a need of 244 affordable dwellings per annum between 2011/12 and 2030/31.
- 6.31 Against the most recent assessment of affordable housing need in Sandwell, a shortfall of -1,063 dwellings has arisen in the first three years of the SHMA 2021 period, which identifies a need for 343 affordable dwellings per annum between 2020/21 and 2038/39.
- 6.32 It is clear that a 'step change' in affordable housing delivery is needed now in Sandwell to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.

The Future Supply of Affordable Housing

Section 7

- 7.1 The future delivery of affordable housing is highly uncertain. In Sandwell borough, the delivery of affordable homes has fluctuated considerably over the Core Strategy period since 2006/07. Annual gross rates of affordable housing completions have varied from as many as 394 dwellings in 2011/12, to as few as 29 dwellings in 2016/17.
- 7.2 The delivery of a higher number of affordable homes in one year obviously does not guarantee that this will continue for future years. The supply of affordable housing is affected by the local market factors, including the number of sites with planning permission and wider national factors including availability of public funding.

The Future Supply of Affordable Housing

- 7.3 The Council's Strategic Housing Land Availability Assessment May 2024 (**CD 6.17**) sets out the Council's own assessment of its deliverable housing supply. It identifies a total supply of 2,607 homes over the five year period between 2023/24 and 2027/28.
- 7.4 From this total figure, it is possible to estimate how many homes might be affordable. As I calculated in Figure 6.1 in the preceding section, the Council has secured an average of 32% gross affordable housing completions over the Core Strategy period since 2006/07. When applying this rate to the 2,607 homes in the Council's trajectory:
- A total of **834 homes can be expected to be affordable**⁴; and
 - This equates to **167 affordable dwellings per annum over the next five years**⁵.
- 7.5 The delivery of around 167 gross affordable dwellings per annum over the next five years between 2023/24 and 2027/28 is some 50 dwellings fewer than the 217 affordable dwellings per annum that have been achieved on average over the Core Strategy period since 2006/07. Put another way, delivery is likely to reduce by just under a quarter.

⁴ 2,607 homes × 32% = 834 affordable homes

⁵ 834 affordable dwellings ÷ 5 years = 167 dwellings per annum

- 7.6 It is important to account for potential Right to Buy losses and associated acquisitions. As Figure 6.2 in the preceding section shows, the Council has lost an average of 210 affordable dwellings per annum from its own stock, and a further 7 dwellings per annum from Registered Providers' stock. The Council has acquired an average of 43 existing homes for affordable use by spending Right to Buy receipts, which can be offset against these losses. Overall, the Council is likely to lose 174 net affordable dwellings per annum through the Right to Buy and associated acquisitions⁶.
- 7.7 The net position is therefore that the Council is likely to deliver 167 affordable dwellings per annum over the next five years, but will lose 174 affordable dwellings per annum through the Right to Buy, resulting in the **net loss of 7 affordable dwellings per annum between 2023/24 and 2027/28**. This is a bleak situation for anybody in housing need in the Borough who is potentially facing a diminishing housing stock.
- 7.8 Figure 7.1 below illustrates the likely future shortfall against affordable housing needs identified in the SHMA 2021. It shows that **the existing shortfall of -1,063 affordable dwellings at the end of 2022/23 will widen to -2,813 affordable dwellings by the end of 2027/28**.

Figure 7.1: Estimated Net Additions to Affordable Housing Stock Compared to Needs Identified in the SHMA 2021 from 2020/21 to 2027/28

Monitoring Period	Additions to AH Stock (Net of RtB) Actual	Additions to AH Stock (Net of RtB) Projected	SHMA 2021 AH Needs Per Annum	Annual Shortfall	Cumulative Shortfall
2020/21	60		343	-283	-283
2021/22	37		343	-306	-589
2022/23	-131		343	-474	-1,063
2023/24		-7	343	-350	-1,413
2024/25		-7	343	-350	-1,763
2025/26		-7	343	-350	-2,113
2026/27		-7	343	-350	-2,463
2027/28		-7	343	-350	-2,813
Total	-34	-35	2,744	-2,813	-2,813
Average	-11	-7	343	-352	-

Sources: See Figure 6.3; SHLAA May 2024 (CD 6.17)

⁶ 210 sales from local authority stock + 7 sales from Registered Providers' stock – 43 acquisitions = net deduction of 174 affordable dwellings

- 7.9 Against the scale of the accumulated shortfalls to date, and the insufficient future supply of affordable housing over the five years 2023/24 to 2027/28, I am in no doubt that each of the (up to) 60 affordable dwellings proposed will be occupied by a household in need. The appeal scheme can make a meaningful contribution to meeting the housing needs of Sandwell borough.

Affordability Indicators

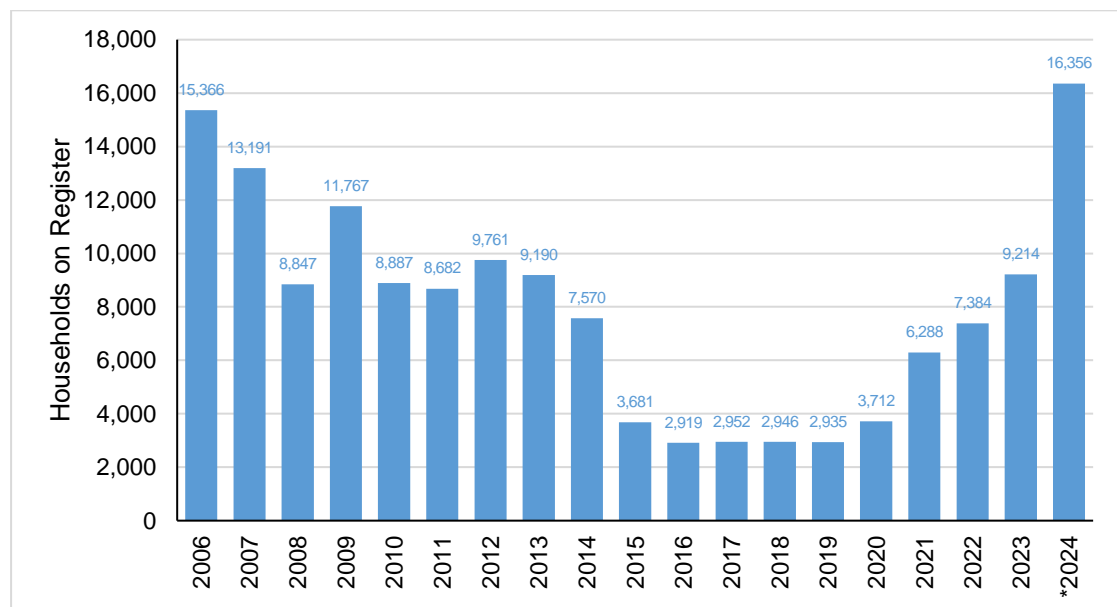
Section 8

- 8.1 This section of this Proof of Evidence reviews the latest affordability indicators and market signals in Sandwell and in the Great Barr local area, since the start of the Core Strategy period in 2006/07.
- 8.2 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of plan making.

Housing Register

- 8.3 The Council's Freedom of Information Response (**Appendix JRO1**) confirms that on **31 March 2024, there were 16,356 households on the Housing Register in Sandwell Borough** – this is the highest number of households since 2006.

Figure 8.1: Housing Register, 2006 to 2024



Source: DLUHC for 2006 to 2023; * Freedom of Information Response (dated 6 June 2024) for 2024

8.4 The Council's FoI response confirms that the Council revised its Housing Allocations Policy in 2020. The paper to the Council's Cabinet meeting of 26 February 2020 (included in **Appendix JRO4**) explained the rationale behind the changes in the context of a changing housing market and the new requirements under the Homelessness Reduction Act 2017:

- a. Paragraph 4.2 raises issues including declining numbers of lettings, ongoing pressure on the use of Temporary Accommodation, high numbers of bids per affordable house (average of between 111 and 217 bids per house, and an ongoing reduction in the number of applicants).
- b. Paragraph 4.2 also highlights affordability problems and tenancy terminations (i.e. evictions) in the private rented sector; it explains that:

"It is clear that many households excluded from accessing the housing register on account of the five-year residency test are also caught up in the growing affordability pressures experienced in the private rented sector (PRS). Tenancy termination in the PRS is now the most common causal factor behind homeless presentations in the borough."

- c. Paragraph 4.5 explains that the relaxation of the existing residency requirement from five years to two years will improve the Council's capacity to respond to homelessness arising from private sector tenancy termination.
- d. Paragraph 4.7 highlights certain restrictive criteria, including an income test, a requirement to bid every twelve months, and the five-year residency test, as being *"very time consuming for staff to process and gatekeep and this in turn is diverting resources that could otherwise be used more purposefully on providing advice and assistance to customers"*.

8.5 The Housing Register in Sandwell has risen sharply in the five years since 2019. The latest figure of 16,356 households is more than five times the 2,935 households that were recorded in 2019. Even in the last year alone, the Housing Register has risen by 7,142 households or 78%, from 9,214 households in 2023 to 16,356 households in 2024.

Waiting Times

- 8.6 The Council's Fol response shows that successful applicants face lengthy waiting times to be allocated an affordable home, as illustrated in Figure 8.2 below. The wait to be housed in an affordable home within the area ranges from 31 weeks for a 1-bedroom dwelling, to 103 weeks for a 3-bedroom dwelling (i.e. almost 2 years) and 169 weeks (i.e. over 3 years) for a 4-bedroom dwelling⁷.

Figure 8.2: Average Waiting Times for Affordable Housing, 2023 and 2024

Size of affordable property	Average waiting time for successful applicants 31 March 2023	Average waiting time for successful applicants 31 March 2024	Change between 2023 and 2024
1 bedroom	30 weeks	31 weeks	+1 week
2 bedrooms	57 weeks	47 weeks	-10 weeks
3 bedrooms	95 weeks	103 weeks	+8 weeks
4+ bedrooms	179 weeks	169 weeks	-10 weeks

Source: Freedom of Information Response (dated 6 June 2024)

- 8.7 The Council's Fol response confirms that the above data includes all applicants across all priority bands, so that those in the highest priority bands are likely to be housed more quickly. Households in less urgent need will by proxy face considerably longer waiting times.

Bids and Lettings in Great Barr with Yew Tree Ward

- 8.8 Sandwell MBC operates a 'choice based lettings' scheme under which applicants can bid for affordable homes advertise on an online portal. The Council's Fol response includes information on the average number of bids received, by dwelling size, in Great Barr with Yew Tree ward.
- 8.9 Figure 8.3 below shows the average number of bids per property in in Great Barr with Yew Tree ward over the 2023/24 monitoring period for a range of types of affordable property.

⁷ The Fol response explains that data for 4-bedroom dwellings should be treated with caution since there are small numbers of these properties and applicants.

Figure 8.3: Average Bids per Affordable Dwelling, Great Barr with Yew Tree Ward, 2023/24

Size of affordable property	Number of properties let	Average bids per property
1 bedroom	2	87
2 bedrooms	6	157
3 bedrooms	8	213
4+ bedrooms	None	None

Source: Freedom of Information Response (dated 6 June 2024)

- 8.10 Figure 8.3 shows that affordable housing in the area attracts significant numbers of bids – from 87 bids per one-bedroom property, to as many as 213 bids per three-bedroom property (indicating particularly high demand for family-sized accommodation).
- 8.11 The Council's Fol response confirms that across Great Barr with Yew Tree ward, there were 16 lettings in 2023/24, and 21 lettings in the previous year 2022/23. This equates to between 2.5% to 3.3% of the total stock of 631 affordable dwellings in the ward, or no more than 1-in-30 affordable dwellings becoming available for letting each year.
- 8.12 For every successful letting, there are clearly tens, if not hundreds of households who have missed out and are left waiting for an affordable home. It is clear that there are limited opportunities to access affordable housing in the Great Barr with Yew Tree area, in light of the low number of lettings.

Homelessness

- 8.13 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted **578 households as having a homelessness prevention duty⁸** and a further **662 households as having a homelessness relief duty⁹** from the Council. This is a total of 1,251 households.
- 8.14 These are households facing the most extreme effects of the housing crisis and have no option but to turn to the Council. Those households with a prevention duty are facing imminent homelessness (e.g. having been served with an eviction notice) and those with a relief duty are already homeless.

⁸ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

⁹ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.

8.15 Furthermore a 2017 report by the National Audit Office (“NAO”) found that:

“The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England. The proportion of households accepted as homeless by local authorities due to the end of an assured shorthold tenancy increased from 11% during 2009-10 to 32% during 2016-17. The proportion in London increased during the same period from 10% to 39%. Across England, the ending of private sector tenancies accounts for 74% of the growth in households who qualify for temporary accommodation since 2009-10. Before this increase, homelessness was driven by other causes. These included more personal factors, such as relationship breakdown and parents no longer being willing or able to house children in their own homes. The end of an assured shorthold tenancy is the defining characteristic of the increase in homelessness that has occurred since 2010.” (Emphasis in original).

8.16 This trend is recognised by Sandwell MBC itself, citing increased private sector tenancy terminations in its decision to relax its Housing Register qualification criteria.

Temporary Accommodation

8.17 The Council’s Fol response shows that on 31 March 2024 it was accommodating 202 households in temporary accommodation, an increase of 79 households (or 64%) compared with the previous year.

Figure 8.4: Use of Temporary Accommodation in Sandwell Borough, 2023 and 2024

Households in Temporary Accommodation	31 March 2023	31 March 2024	Change between 2023 and 2024
Households housed within the Borough	54	96	+42 households
Households housed outside the Borough	69	106	+37 households
Total	123	202	+79 households

Source: Freedom of Information Response (dated 6 June 2024)

8.18 Strikingly, more households were being accommodated outside the Borough rather than within it. Sometimes, this means households are being placed further away from their social support networks (e.g. friends and family), employment and education.

- 8.19 It is important to remember that each household in temporary accommodation is experiencing the most acute effects of the housing crisis, lacking a permanent home and experiencing sometimes poor conditions.
- 8.20 As I highlighted in section 3 of this Proof of Evidence, the “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” report published in August 2019 by the Children’s Commissioner (**CD 6.27**) found that temporary accommodation presents serious risks to children’s health, wellbeing and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour or those with substance abuse issues. Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability.

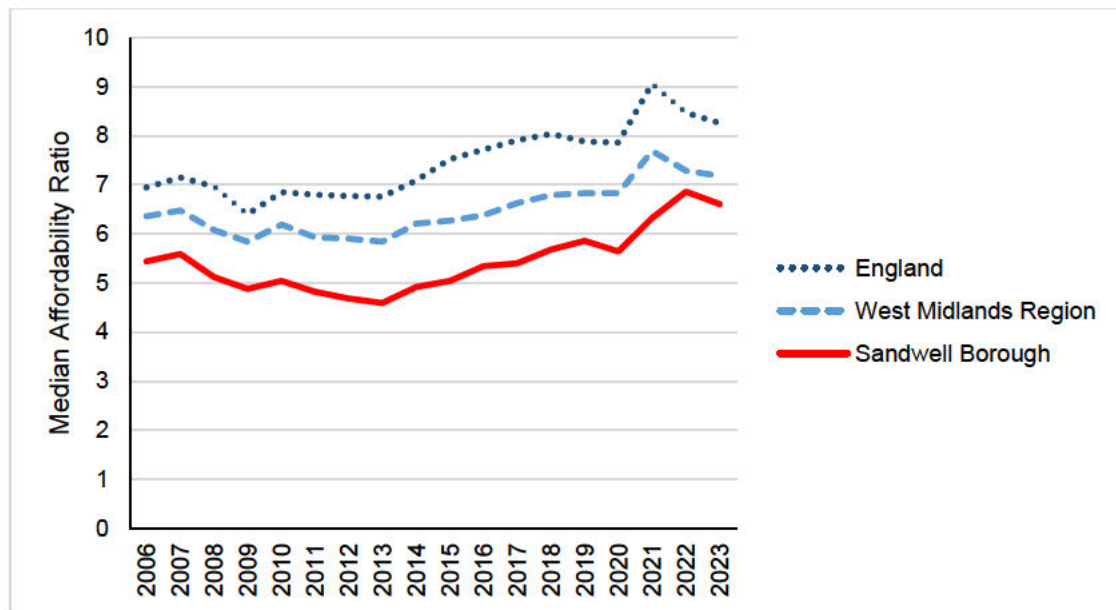
Affordability Ratios

- 8.21 Affordability ratios illustrate the relationship between average house prices and average workplace-based earnings, i.e. how much does a house cost in relation to the earnings of somebody working in Sandwell borough? For context, mortgage lending is typically offered on a maximum of 4.5 times earnings, subject to individual circumstances.

Median Affordability Ratio

- 8.22 In Sandwell in 2023, **the median house cost 6.61 times median workplace based earnings**. This is 47% higher than the ‘benchmark’ of 4.5 times earnings which is used for lending. It is also the second-highest median affordability ratio in the Borough since current records began in 1997 (the highest being in 2022).

Figure 8.5: Median Affordability Ratio, Sandwell, 2006 to 2023



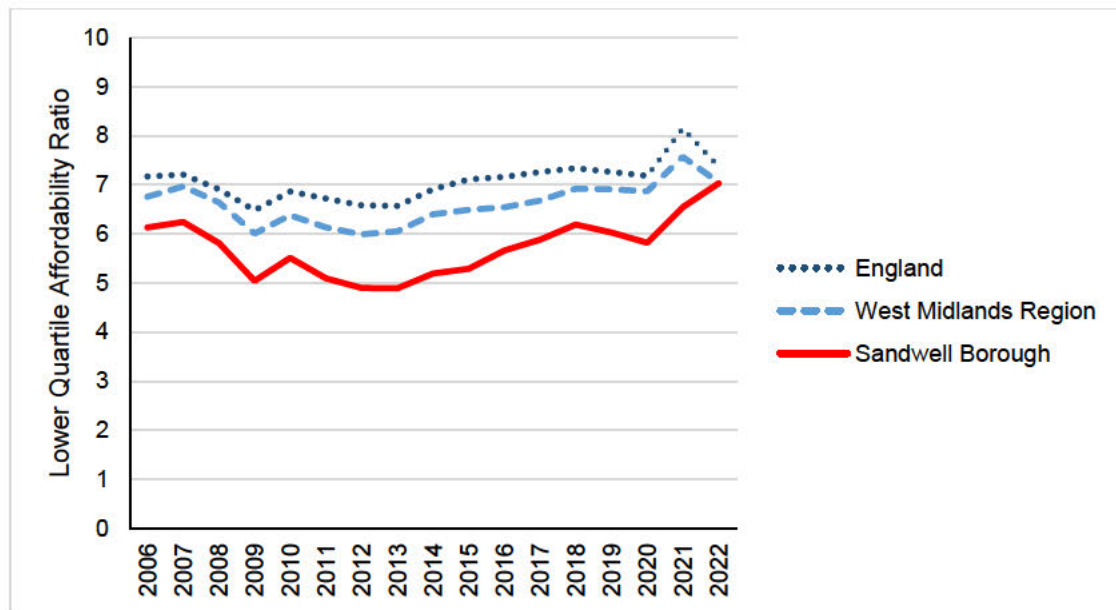
Source: Office for National Statistics

- 8.23 Between 2007 and 2013, the median affordability ratio in Sandwell reduced from 5.44 to 4.59; this drop coincided with the 2008 financial crisis and its aftermath, and was in line with regional and national trends. However, **the median affordability ratio has increased markedly since 2013, and at a faster rate than in the West Midlands and in England.** Between 2013 and 2023, the median ratio in Sandwell increased by 44%, which is faster than the 23% increase seen in the West Midlands, and the 22% increase seen across England.

Lower Quartile Affordability Ratio

- 8.24 Lower quartile affordability ratios are representative of the 'entry level' of the housing market; they compare lower quartile house prices with lower quartile incomes. In Sandwell in 2022 (the most recent year for which lower quartile data was published), **the lower quartile house cost 7.03 times lower quartile workplace based earnings.** This is 56% higher than the 'benchmark' of 4.5 times earnings which is used for lending, and is also 2% higher than the median ratio of 6.86 that same year. It is also the highest lower-quartile affordability ratio in the Borough since current records began in 1997.

Figure 8.6: Lower Quartile Affordability Ratio, Sandwell, 2006 to 2022



Source: Office for National Statistics

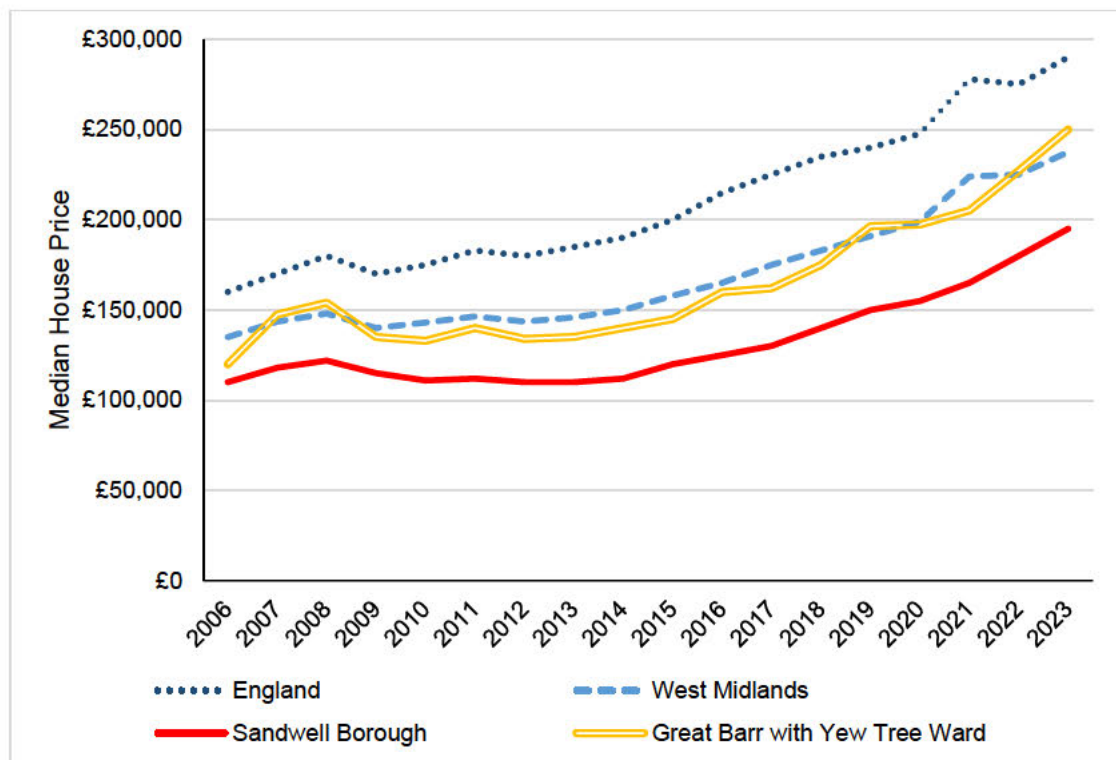
- 8.25 Between 2007 and 2014, the lower quartile affordability ratio in Sandwell reduced from 6.13 to 4.89, following a similar trend to the median ratio (as discussed above). However, **the lower quartile affordability ratio has also increased markedly since 2014, and at a faster rate than in the West Midlands and in England.** Between 2014 and 2022, the lower quartile ratio in Sandwell increased by 44%, which is faster than the 17% increase seen in the West Midlands, and the 12% increase seen across England.

House Prices

Median House Prices

- 8.26 The median house price in Sandwell remained broadly stable between 2006, when it stood at £110,000, and 2014 when it stood at £112,000, just £2,000 or 1% higher. Since 2014, the median house price in Sandwell has increased significantly, rising by 74% to reach £195,000 in 2023. This is faster than the 58% increase in the West Midlands and the 53% increase in England recorded over the same period.

Figure 8.7: Median House Prices, Sandwell and Great Barr with Yew Tree Ward, 2006 to 2023



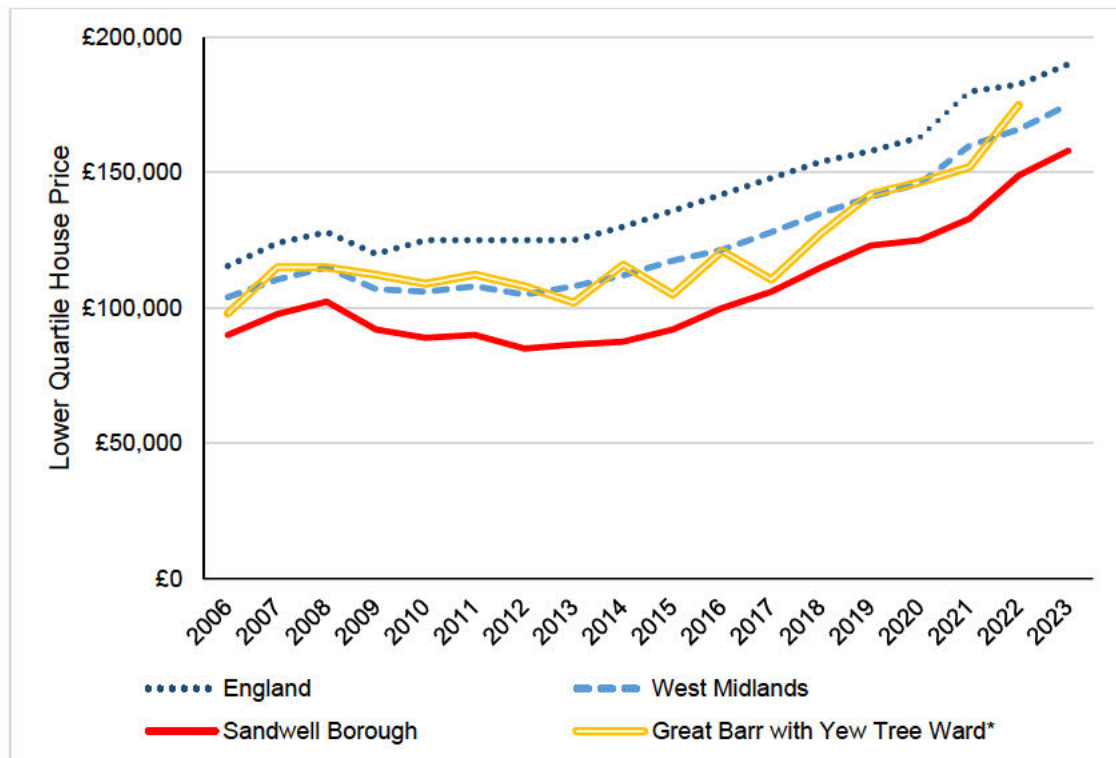
Source: House Price Statistics for Small Areas

- 8.27 Local house price data for Great Barr with Yew Tree Ward shows that the area is an expensive part of Sandwell borough, with the median house price reaching £250,000 in 2023. Notably, the ward-level median house price has increased by 79% between 2014 and 2023, which is even faster than the 74% increase in Sandwell as a whole over the same period.

Lower Quartile House Prices

- 8.28 The lower quartile house price in Sandwell fell between 2006, when it stood at £90,000, and 2014 when it stood at £87,500. However, since 2014, the lower quartile house price in Sandwell has increased significantly, rising by 81% to reach £158,100 in 2023. This is faster than the 56% increase in the West Midlands and the 46% increase in England recorded over the same period. When compared with the median house price data, it is clear that the lower quartile house price in Sandwell has risen faster, indicating greater pressure in the 'entry level' of the housing market.

Figure 8.8: Lower Quartile House Prices, Sandwell and Great Barr with Yew Tree Ward, 2006 to 2023



Source: House Price Statistics for Small Areas

* ward level data discontinued after 2022

- 8.29 Local house price data for Great Barr with Yew Tree Ward shows that the area is an expensive part of Sandwell borough even at the lower quartile level, with the lower quartile house price reaching £175,000 in 2022 (the most recent year for which data is available). The ward-level lower quartile house price has increased by 51% between 2014 and 2022.

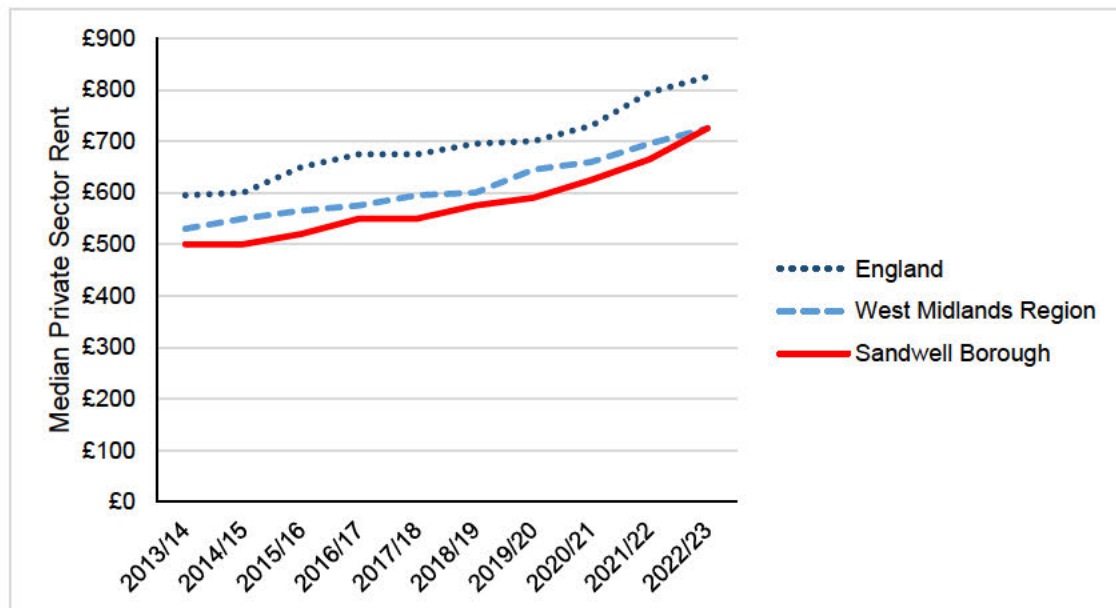
Private Sector Rents

Median Private Sector Rents

- 8.30 In the ten monitoring years between 2013/14 and 2022/23 (data available only from 2013/14 onwards), the median rent in Sandwell increased by 45%, rising from £500 in 2013/14 to £725 in 2022/23; this compares with the increases of 37% in the West Midlands and of 39% in England over the same period.

- 8.31 The median rent increased steadily in Sandwell for the seven years between 2013/14 and 2019/20, but has since increased sharply by £135, or 28%, in the last four years between 2019/20 and 2022/23. The increase in median rents over this four-year period compares with just a 12% increase in the West Midlands, and an 18% increase in England.

Figure 8.9: Median Private Sector Rents, Sandwell, 2013/14 to 2022/23

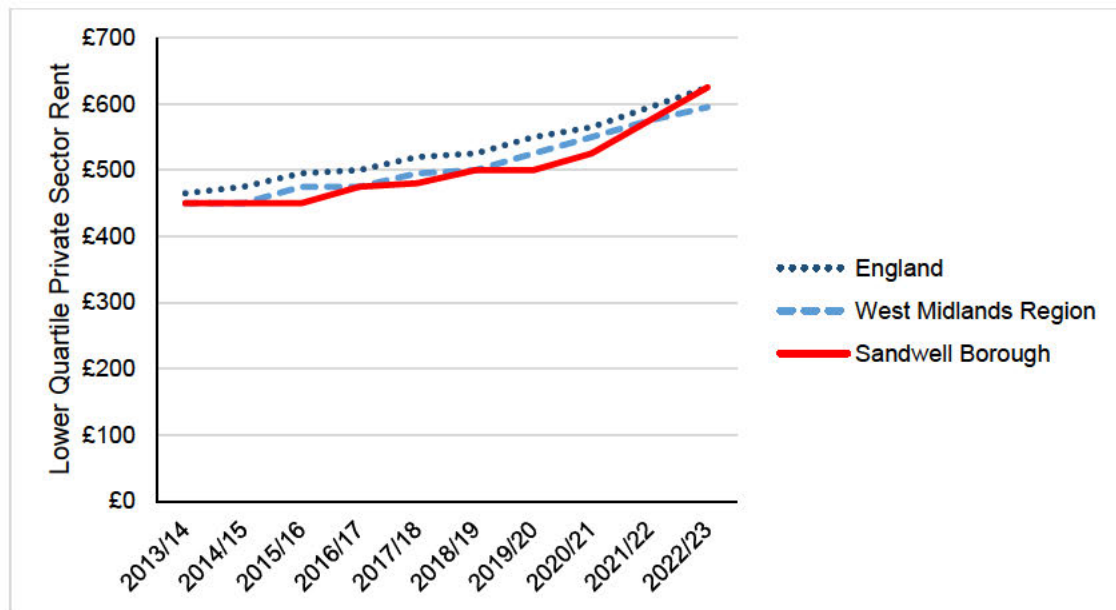


Sources: Office for National Statistics and Valuation Office Agency

Lower Quartile Private Sector Rents

- 8.32 Lower quartile private sector rents are representative of the cheaper properties on the rental market that are likely to be sought by those households on lower incomes.
- 8.33 In the ten monitoring years between 2013/14 and 2022/23, the lower quartile rent in Sandwell increased by 39%; this compares with the increases of 32% in the West Midlands and of 34% in England over the same period.
- 8.34 A similar trend to that seen amongst median rent prices in Sandwell, can also be seen with lower quartile rent prices. Over the seven year period from 2013/14 to 2019/20, the lower quartile rent prices increased steadily in Sandwell by just 11%. However, from 2019/20 to 2022/23 the lower quartile private rent increased sharply by £125, or 23%; this compares with an increase of just 19% in both the West Midlands and in England.

Figure 8.10: Lower Quartile Private Sector Rents, Sandwell, 2013/14 to 2022/23

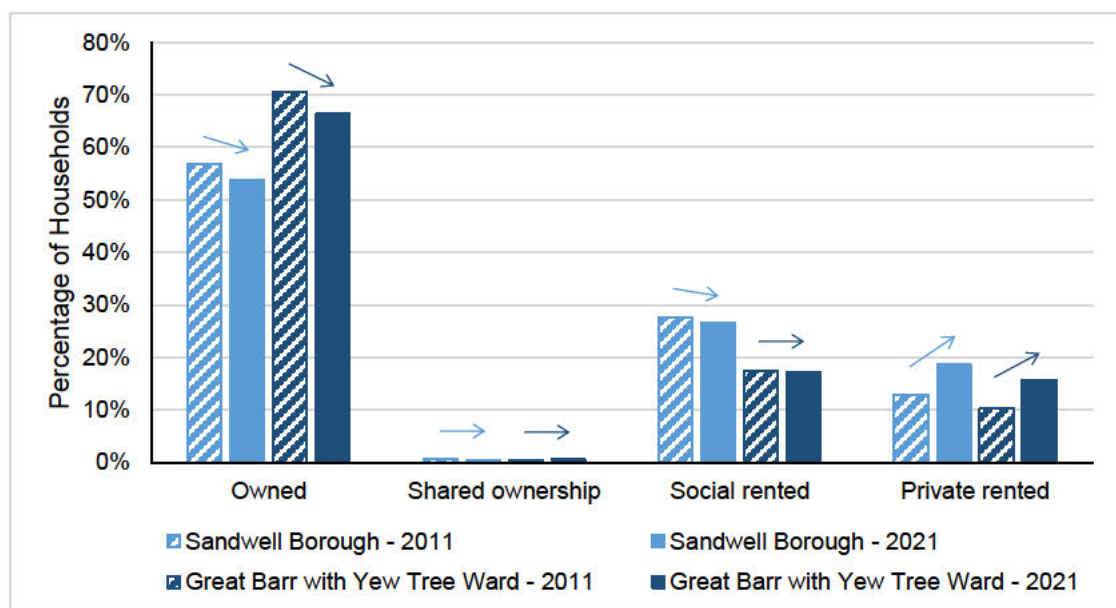


Sources: Office for National Statistics and Valuation Office Agency

Tenure

8.35 Figure 8.11 below compares the tenure mix in Sandwell and in Great Barr and Yew Tree ward between the Censuses undertaken in 2011 and 2021, to illustrate the changing trends in occupation. 2011 data is shown in hatched shading, and 2021 data in solid colour shading.

Figure 8.11: Tenure, 2011 and 2021



Source: Census 2011 and 2021

- 8.36 As the chart shows, the proportion of owner occupation has decreased (for example, falling from 63% in Sandwell in 2011, to 57% in 2021), as has the proportion of social renting (although only by around 1% at all levels). However, there have been corresponding increases in private renting (for example, rising from 13% in Sandwell in 2011 to 19% in 2021).
- 8.37 This data indicates that fewer households are accessing homeownership, with more households turning to the private rented sector, paying ever-rising rents and without security of tenure. Meanwhile, social renting has declined slightly, and shared ownership has grown little over the ten years, meaning that these alternatives to private renting are not keeping up with demand.

Conclusions on Affordability Indicators

- 8.38 As demonstrated through the analysis in this section, there is an increasing affordability challenge in Sandwell Metropolitan Borough. Whilst the cost of housing in Sandwell might generally be below that of the wider West Midlands region and of England as a whole, indicators are showing worsening affordability trends relative to the region and nation.
- a. The lower quartile affordability ratio in Sandwell now stands at 7.03, a +44% increase since the post-recession period in 2014, and the highest ratio on record;
 - b. Lower quartile house prices in Sandwell now stand at £158,100, a +88% increase since 2014, and a faster rate of increase than in the West Midlands and in England as a whole;
 - c. Lower quartile private sector rents in Sandwell now stand at £625 per month, which is an increase of +£125 in the last three years, including two consecutive years where lower quartile rents increased by £50.
- 8.39 These worsening market signals show that it is becoming more challenging to afford a home to rent or to buy in Sandwell and in Great Barr. Against this worsening backdrop, it is unsurprising that affordable housing in Sandwell is heavily oversubscribed:
- a. There are a staggering 16,356 households on the Housing Register on 31 March 2024;
 - b. Even successful applicants face long average waits for certain types of affordable homes – for example 103 weeks (almost 2 years) for a three-bedroom home in 2024;

- c. Affordable homes in Great Barr attract high numbers of bids (as many as 213 bids for each three-bedroom home advertised) in the context of just 16 affordable housing lettings in 2023/24;
 - d. The use of temporary accommodation increased between 2023 and 2024 to 202 households, of whom more than half (106 households) were placed outside the Borough; and
 - e. 1,251 households presenting to Sandwell MBC as either homeless, or facing imminent homelessness, in 2022/23.
- 8.40 It is clear to me that **Sandwell Borough is experiencing nothing short of a housing crisis** and that matters are only getting worse. Urgent action is therefore needed now to deliver more affordable homes.

The Benefits of the Proposed Affordable Housing

Section 9

- 9.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 9.2 As set out elsewhere in this Proof of Evidence, there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. Sandwell Borough is no exception to this.
- 9.3 The appeal scheme will provide up to 60 affordable dwellings on site. The wider social and economic benefits of affordable housing per se are commonly recognised.
- 9.4 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

Benefits of the proposed Affordable Housing at the appeal site

- 9.5 As the agreed Statement of Common Ground establishes at paragraph 5.6 at page 8, the proposed affordable housing represents a separate benefit to be weighed in the planning balance, in addition to the weight afforded to general housing provision.
- 9.6 The offer of 40% affordable housing exceeds the requirements of adopted Policy HOU3 (25%) of the Core Strategy. It should be noted that affordable housing policies are drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 9.7 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD 4.3**) in September 2018 who was clear at paragraph 72 of their decision that:

“On the other hand, in the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full

compliance as here, when others have only achieved partial compliance, would be a considerable benefit". (my emphasis).

- 9.8 It is of course relevant to note that, as shown in section 4 of this Proof of Evidence, the Development Plan recognises that there are likely to be instances across Sandwell and the wider Black Country where other applications have only achieved partial compliance with the policy requirements (often due to viability) or are delivering no affordable housing at all.
- 9.9 The affordable housing benefits of the appeal scheme are therefore:
- a. An offer of 40% (up to 60 dwellings) of the scheme provided as affordable housing, in exceedance of the policy requirement;
 - b. In numerical terms, this is up to 22 dwellings more than a policy-compliant scheme will achieve;
 - c. A mix of affordable tenures in accordance with the definitions at Annex 2 of the NPPF, to be confirmed at the reserved matters stage to provide flexibility to respond to circumstances at that time;
 - d. A deliverable scheme which provides much needed affordable homes;
 - e. Delivering a broader mix of tenures to provide a more balanced community and to enhance its vitality;
 - f. In a sustainable location;
 - g. With the affordable homes managed by a Registered Provider;
 - h. Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation; and
 - i. Greater security of tenure than the private rented sector.
- 9.10 In my opinion these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.

The Weight to be Attributed to the Proposed Affordable Housing

Section 10

- 10.1 The NPPF is clear at paragraph 31 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 10.2 Paragraph 60 of the NPPF sets out the Government's clear objective of "*significantly boosting the supply of homes*" and I would emphasise that it explains "*The overall aim should be to meet as much of an area's identified housing need as possible*".
- 10.3 The NPPF requires local authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, "*including those who require affordable housing*".

The Council's Assessment of the Planning Application

- 10.4 The application was refused by the Council under delegated powers on 17 January 2024 (decision letter at **CD 5.1**). The Officers' Report (**CD 5.2**) summarises the Council's assessment of the planning application.
- 10.5 The Officers' Report provides a brief commentary on the merits of the proposed development. At the fifth page (pages and paragraphs unnumbered) the Officers' Report highlights the proposed affordable housing provision, simply stating that "*The offer of 40% AH has been tabled however (in my opinion) this does not out weight [sic] the harm caused by building on the Green Belt*". There is no further discussion of affordable housing need, delivery, affordability indications, nor even the affordable housing provisions in the Development Plan.
- 10.6 The Officers' Report further indicates that the Council does not appear to have consulted its own housing officers in considering this application.
- 10.7 In my view, the Council has failed to engage with the matter of affordable housing, evidenced by its perfunctory Officers' Report which demonstrates no meaningful consideration of the topic. It is my opinion that this this is a serious omission from the planning balance exercise.

The Council's Statement of Case (CD 6.11)

- 10.8 Paragraph 7.34 at page 34 of the Council's Statement of Case discusses the role of affordable housing in whether 'very special circumstances' can be demonstrated in respect of Green Belt policy.
- 10.9 The paragraph notes that *"It is common ground that the provision of market and affordable housing carry very substantial weight in the planning balance"*; in my view this recognition is welcome and a proper reflection of the weight that the proposed affordable housing should carry, in light of the scale of unmet needs, worsening affordability and the 'enhanced' 40% provision that the proposed development offers.
- 10.10 The paragraph then appears to backtrack, by suggesting that *"what is not agreed is combined with the limited number of properties provided (a small number in comparison to the Council's shortfall), is whether that weight is significant enough to overcome harm to the Green Belt by reason of inappropriateness and any other harm"*. This appears to 'downplay' the benefit of the proposed affordable housing (even though the Council ascribes 'very substantial' weight to it) because the proposed 60 affordable dwellings represents a small number compared with the existing shortfalls.
- 10.11 In my view, the Council's approach is not logical. The shortfalls in affordable housing provision are undoubtedly severe – at section 6 of this Evidence, I identify shortfalls of -3,107 dwellings against the needs calculated in the SHMA 2017, and of -1,063 dwellings against the needs calculated in the SHMA 2021. The proposed 60 affordable dwellings might represent a small proportion of these shortfalls, but they will still meet the needs of another 60 households which would otherwise remain unmet, and is consistent with paragraph 60 of the NPPF which makes clear that *"The overall aim should be to meet as much of an area's identified housing need as possible"*.
- 10.12 To my mind, challenging as it may be to rectify the shortfall, any progress is still valuable. Opportunities to get closer to meeting that need should be taken, especially in the context of the NPPF.

Relevant Appeal Decisions

Appeal - Land Off Bullens Green Lane, Colney Heath (June 2021) (CD 4.8)

- 10.13 An appeal at Colney Heath located partially in Welwyn Hatfield Borough Council and partially in St Albans District Council decided in June 2021 supports the view that the delivery of affordable housing in authorities with shortfalls in affordable housing

delivery can contribute towards demonstrating Very Special Circumstances. At Paragraphs 53 and 54 of the decision the Inspector was clear that:

“The uncontested evidence presented by the appellant on affordable housing for both local authorities illustrates some serious shortcomings in terms of past delivery trends. In relation to WHBC, the affordable housing delivery which has taken place since 2015/16 is equivalent to a rate of 23 homes per annum. The appellant calculates that the shortfall stands in the region of 4000 net affordable homes since the 2017 SHMA Update, a 97% shortfall in affordable housing delivery. If the shortfall is to be addressed within the next 5 years, it would require the delivery of 1397 affordable homes per annum. In SADC, the position is equally as serious. Since the period 2012/13, a total of 244 net affordable homes have been delivered at an average of 35 net dwellings per annum. Again, this equates to a shortfall also in the region of 4000 dwellings (94%) which, if to be addressed in the next 5 years, would require the delivery of 1185 affordable dwellings per annum.

The persistent under delivery of affordable housing in both local authority areas presents a critical situation. Taking into account the extremely acute affordable housing position in both [St Albans] and [Welwyn Hatfield], I attach very substantial weight to the delivery of up to 45 affordable homes in this location in favour of the proposals” (my emphasis).

10.14 In her conclusions at paragraph 78, the Inspector goes on to consider the planning balance and states that:

“The proposals would cause harm by reason of inappropriateness and harm to openness. Both of these attract substantial weight. I have also attached moderate weight to harm to the character and appearance of the area. However, these appeals involves two local authority areas, both of which have acute housing delivery shortages and acute affordable housing need. The proposals would make a contribution towards addressing these needs in the form of market, self-build and affordable housing in both WHBC and SADC. I have attached very substantial weight to the provision of both market housing and affordable housing. I have attached substantial weight to the provision of self-build housing. These factors, when considered collectively demonstrate that very special circumstances do exist” (my emphasis).

Appeal Decision: Land at Sondes Place Farm, Westcott Road, Dorking (November 2023) (CD 4.13)

- 10.15 At this recent appeal in Dorking, Surrey, the Inspector highlighted that the Council had experienced considerable shortfalls in its affordable housing delivery over the development plan period against multiple assessments of housing need (Paragraph 85).
- 10.16 As discussed above in Section 7 of this Proof of Evidence, the Inspector recorded, at paragraph 86 of the decision, that the shortfalls in affordable housing delivery are expected to widen due to the inadequate affordable housing supply.
- 10.17 The Inspector went on detail the adverse effects arising from insufficient affordable housing at paragraph 88 of the decision, that *“being able to access good housing has a bearing upon everyday life”, including “financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development”*.
- 10.18 In making his final comments on affordable housing at paragraph 89, the Inspector concluded that *“The affordable homes would make a sizeable contribution to addressing the acute and long-established shortfall which will not be fully addressed in the short term. I give the affordable housing provision very substantial positive weight”* (my emphasis).

Appeal Decision: Oxford Brookes University, Wheatley (March 2020) (CD 4.7)

- 10.19 In the appeal decision at Oxford Brookes University Campus at Wheatley, Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:
- “It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses”* (my emphasis).
- 10.20 The Inspector went on to state at paragraph 13.102 that *“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list”* before concluding that *“Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”*.

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

“The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight” (my emphasis).

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

Appeal Decision: Land east of Park Lane, Coalpit Heath, South Gloucestershire (September 2018) (CD 4.4)

- 10.23 Paragraph 61 of the decision states that *“there are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom build housing (CBH). They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply. The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant – they would still comprise significant social benefits that merit substantial weight.”* (my emphasis)

My Conclusions on the Weight to be Attributed to the Proposed Affordable Housing

- 10.24 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 10.25 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.

10.26 This Proof of Evidence has revealed the extent of Sandwell Borough's housing crisis, which shows a very challenging situation which is being compounded by worsening affordability over time:

- a. Most alarmingly, the Council is losing almost as many homes through the Right to Buy than it is delivering, resulting in meagre net contributions to the affordable housing stock, at an average of just 18 net affordable dwellings per annum between 2006/07 and 2022/23.
- b. These losses are affecting the Council's ability to meet affordable housing needs:
 - i. The SHMA 2017 identified a need for 244 net additional affordable homes per annum between 2011/12 and 2030/31; to date, a cumulative shortfall of -3,107 affordable dwellings has arisen; and
 - ii. The SHMA 2021 found a need for 343 net additional affordable homes per annum between 2020/21 and 2037/38; in the first three years of this period to date, a cumulative shortfall of -1,063 affordable dwellings has already arisen.
- c. Affordability indicators are all pointing to a worsening situation in Sandwell. Whilst the Borough is generally more affordable than the West Midlands and England as a whole, that is of little comfort given that the position has been deteriorating since 2013/14, with the affordability ratios, house prices and private rents all increasing at a faster rate than the nation and the region.
- d. This worsening position is exemplified by the lower quartile affordability ratio which (at the latest count in 2022) stands at 7.03, which is the highest such ratio in Sandwell on record and well above the 'benchmark' of 4.5 for which mortgages are typically offered.
- e. The impacts of Sandwell's housing crisis are reflected in the acute and rising level of demand for affordable housing, with 16,356 applicants on the Housing Register on 31 March 2024; lengthy waits for affordable homes even for successful applicants, and each affordable home in Great Barr attracting tens if not hundreds of bids. Evidently, affordable housing is heavily oversubscribed in Sandwell. This is a bleak situation for anybody who requires help with their housing situation in the Borough.

10.27 Together, these factors reveal the ways in which Sandwell's housing crisis is affecting real people in the borough.

- 10.28 The present prospects for housing in Sandwell may be bleak but every additional affordable home will help to alleviate some of the worst impacts of the housing crisis. I am firmly of the view that an affordable home can be transformative to the livelihoods and prospects of its occupants; the proposed development offers up to 60 much needed affordable dwellings - which will accordingly help 60 more households.
- 10.29 Against the scale of the unmet need for affordable housing and the worsening affordability picture; and taking account of the 'enhanced' affordable housing offer which will secure 22 more affordable homes than the minimum required under policy; I consider that the proposed affordable housing should carry **very substantial weight** in the planning balance.