

## **Appeal by Mr P Crocker**

Appeal Ref: APP/D1265/W/24/3353912

LPA Ref: P/OUT/2023/02644

## **Affordable Housing Statement**

Annie Gingell (BSc (Hons) MSc MRTPI)

**March 2025**

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## Contact

Annie Gingell

[annie.gingell@turley.co.uk](mailto:annie.gingell@turley.co.uk)

## Client

Mr P Crocker

## Our reference

02537

March 2025

# 1. Introduction

- 1.1 My name is Annie Gingell, and I am an Associate Director at **Turley**. I am instructed to present affordable housing evidence at this Inquiry by **Mr P Crocker**, herein referred to as 'the Appellant.'
- 1.2 This Appeal follows the refusal by Dorset Council ('the Council') of a hybrid planning application with the outline element for up to 120 dwellings on Land off Butts Close and Schoolhouse Lane ('the Appeal Site').
- 1.3 My evidence specifically addresses affordable housing provision and the weight to this benefit in the planning balance, taking into account evidence of local needs and delivery as well as a range of other affordable housing need and affordability indicators.
- 1.4 As part of my evidence, I have obtained and relied upon data from the Council through a Freedom of Information (FOI) request, available at **Appendix AG1**.
- 1.5 The evidence which I have prepared and provide for this Appeal (PINS Reference No. APP/D1265/W/24/3353912) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

## Qualifications

- 1.6 I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development also from Cardiff University (2020).
- 1.7 I am a chartered member of the Royal Town Planning Institute (RTPI) with over 10 years professional experience in the field of town planning and housing.
- 1.8 I joined Turley in October 2024 as an Associate Director. Before my role at Turley, I was an Associate Director at Tetlow King Planning, having joined the company in 2017 as a Graduate Planner. Prior to this I worked as a Planning Policy Officer in Local Government at Bristol City Council. During my undergraduate degree I worked as an Assistant Planner at Pegasus Group primarily on Section 78 appeals.
- 1.9 During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East of England, and London. I have also acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country.
- 1.10 I also sit on British Property Federation (BPF) Affordable Housing Committee, the Women in Planning (WiP) South West Committee and I am a network leader for Neurodiversity in Planning (NiP).

## Scope of Evidence

- 1.11 My evidence comprises this Statement, associated Core Documents, and an accompanying volume of Appendices. The Core Documents referred to in this evidence are listed at **Appendix AG2**.
- 1.12 This Statement comprises the following sections:
- Section 2 - Affordable Housing Offer
  - Section 3 - Relevant Planning Policy and Guidance
  - Section 4 - Affordable Housing Needs
  - Section 5 - Past Affordable Housing Delivery
  - Section 6 - Market Conditions
  - Section 7 - Future Supply of Affordable Housing
  - Section 8 - Justification and Associated Benefits
  - Section 9 - Summary
- 1.13 My evidence should be read alongside the main Planning Evidence of Clare Spiller (Chapman Lilly Planning) (**CD11.001**) and Five-Year Housing Land Supply Evidence of Jeff Richards (Turley) (**CD11.002**). It should also be read alongside the overarching Statement of Common Ground (SoCG) (**CD4.019**).

## 2. Affordable Housing Offer

- 2.1 The proposed development is for up to 120 dwellings, of which 40% (up to 48 dwellings) are to be provided on-site as affordable housing.
- 2.2 This level of provision meets the expectations of Policy 8 of the North Dorset Local Plan (2016) which seeks 40% provision from qualifying developments in this location.
- 2.3 The proposed tenure split of the affordable housing units is set out in Table 2.1 below.

*Table 2.1: Tenure Split of Affordable Housing Units*

Tenure	No. Affordable Units	%age
Affordable Rented	25	52%
Shared Ownership	11	23%
First Homes	12	25%
<b>Total</b>	<b>48</b>	<b>100%</b>

- 2.4 The proposed tenure split has been amended to the above from '8 Affordable Rent, 15 Shared Ownership and 25 First Homes' in line with recommendations made by the Housing Team on 12 December 2023 (**CD8.001**).
- 2.5 The affordable housing provision will be secured through a Section 106 Planning Obligation.

### 3. Relevant Planning Policy and Guidance

#### Introduction

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan as a whole unless other material considerations indicate otherwise.
- 3.2 The former Dorset County, East Dorset, North Dorset, Purbeck, Weymouth & Portland, and West Dorset councils merged on 1 April 2019 to become a single unitary authority (UA) under Dorset Council. The appeal site lies within the former North Dorset Council authority area of the Dorset Council Unitary Authority.
- 3.3 This section identifies the relevant adopted and emerging Development Plan documents across the former North Dorset Council authority area and the Dorset Council Unitary Authority area for the provision of affordable housing at the appeal site; as well as any pertinent material considerations. It also addresses the relevant policy context set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

#### The Development Plan

##### North Dorset Local Plan Part 1 (January 2016) – CD3.001

- 3.4 The North Dorset Local Plan Part 1 (the 'LPP1') was adopted on 15 January 2016 and sets out the approach to managing development in the former district over the 20 year period from 2011 to 2031.
- 3.5 Paragraph 2.46 on page 18 sets out the vision for North Dorset by 2031 which includes to *"have more housing, and in particular more affordable housing, that better meets the diverse needs of the District"*. This is underpinned by '**Objective 5** – Meeting the District's Housing Needs' detailed at paragraph 2.53 on page 21 which sets out that the diverse needs of the district will be met by (among other things) *"ensuring that all new dwellings contribute to overcoming the affordable housing shortfall"*.
- 3.6 **Policy 8 'Affordable Housing'** serves as the main policy for affordable housing provision across the former district. It states that developments that deliver 11 or more net additional dwellings and which have a maximum combined gross floorspace of more than 1,000 square metres will be required to provide onsite affordable housing. For sites of 6 to 10 in Areas of Outstanding Natural Beauty<sup>1</sup>, financial contributions to the provision of affordable housing will be sought.
- 3.7 The level of affordable housing provision required is contingent on location and sets out the following proportions for qualifying developments:

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<sup>1</sup> Now National Landscapes

- a) *“within the settlement boundaries of Gillingham and Sturminster Newton and within any urban extensions to these towns, 25% of the total number of dwellings will be affordable; and*
  - b) *within the settlement boundaries of Shaftesbury and Blandford (Forum and St. Mary) and within any urban extensions to these towns, 30% of the total number of dwellings will be affordable; and*
  - c) *elsewhere in the District 40% of the total number of dwellings will be affordable.”*
- 3.8 In respect of tenure mix the policy sets out that *“Within the District as a whole, 70% to 85% of all new affordable housing should be provided as affordable rented and/or social rented housing. The remaining 15% to 30% should be provided as intermediate housing.”*
- 3.9 Page 369 of the Plan sets out the ‘Monitoring Framework’ for ‘Objective 5’ and associated Policy 8. In respect of the objective to ensure that new dwellings contribute to overcoming the affordable housing shortfall, the ‘Intended Outcome’ is that appropriate provision of affordable housing is made with the ‘Achievement Indicator’ being the number of affordable homes approved per annum.

## Other Material Considerations

### National Planning Policy Framework (December 2024)

- 3.10 The latest NPPF was published on 12 December 2024 and outlines the government's planning policies for delivering affordable housing in England within the broader context of sustainable development (paragraph 8) and in support of the Government's objective of significantly boosting the supply of homes (paragraph 61).
- 3.11 Paragraph 8b highlights that the social objective 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”*. Whilst paragraph 61 makes 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” (emphasis added).*
- 3.12 A significant update pertains to Paragraph 11d(ii), which outlines the presumption in favour of sustainable development where policies are out of date or where a local planning authority cannot demonstrate a five-year supply of deliverable housing sites. Paragraph 11dii emphasizes that in such circumstances permission should be granted unless:
- “(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing*

*development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination” (emphasis added).*

3.13 Key provisions in respect of affordable housing include:

- **Meeting Housing Needs:** Paragraph 61 is clear that in order to support the Government’s objective of significantly boosting the supply of homes, the overall aim should be to meet an area’s identified housing need in full.
- **Assessing Housing Needs:** Paragraph 62 emphasises that planning policies should be informed by a local housing needs assessment, whilst paragraph 63 is clear that the size, type, and tenure of housing required for different groups, including those requiring affordable housing should be assessed and reflected in planning policies.
- **Affordable Housing Provision:** Paragraph 64 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified.
- **Thresholds for Provision:** Paragraph 65 indicates that affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas where policies may set out a lower threshold of five units or fewer.
- **Affordable Home Ownership:** Paragraph 66 expects that, for major developments involving the provision of housing, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.
- **Mixed Tenure Sites:** Paragraph 71 is clear that mixed tenure sites can provide a range of benefits, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported).
- **Definition of Affordable Housing:** Annex 2 of the NPPF defines affordable housing as housing for sale or rent for those whose needs are not met by the market.

3.14 These provisions are designed to ensure that affordable housing is not only integrated into new developments but also aligns with the evolving needs of diverse community groups, fostering sustainable and inclusive growth for present and future generations.

#### **National Planning Practice Guidance (2014, Ongoing Updates)**

3.15 The NPPG is an online resource that provides detailed guidance to support the implementation and application of the NPPF. It was first published in March 2014 and is regularly updated to reflect changes in planning legislation, policies, and best practices.



**Appendix AG3** sets out the paragraphs of the NPPG of particular relevance to affordable housing.

#### **Emerging Dorset Local Plan**

- 3.16 The Council commenced work on a Dorset Council Local Plan at the point that Dorset Council was formed in 2019. A consultation on the draft Plan was undertaken in January 2021. In March 2024, the Council resolved to produce a new-style local plan prepared under the then proposed reforms to the plan-making system.
- 3.17 The latest Local Development Scheme (**CD7.1**) sets out an updated timetable for its production, including an intended site options consultation in August 2025, an intended publication consultation in August 2026, and an intended submission plan in December 2026. Given the early stages of the emerging Plan, it holds no weight in the determination of the appeal proposals.

#### **Emerging Marnhull Neighbourhood Plan – CD6.001**

- 3.18 A Regulation 14 draft of the emerging Marnhull Neighbourhood Plan was published for consultation on 10 February 2025, closing on 31 March 2025. The emerging Plan is intended to cover the 15 year period from 2023 to 2028.
- 3.19 In considering the results of a Parish Survey undertaken in 2023 paragraph 4.3 on page 11 notes that *“For many the priority should be for more ‘affordable’ housing, one, two and three bedroom homes rather than expensive ‘executive’ houses. Smaller units, both affordable and open market, would provide opportunities for younger people and for those wishing to downsize whilst remaining in the village.”*
- 3.20 Chapter 5 concerns the ‘Vision’ for Marnhull in 2028. Paragraph 5.2 on page 12 highlights a number of characteristics to be found in order to be *“a thriving and sustainable village”* including *“Housing that supports this mix, meets local needs, is affordable and future-proofed against the impact of climate change”*.
- 3.21 In respect of ‘Objectives’, paragraph 5.3 notes that, among other things, the Plan aims to *“Encourage a mix of housing and other development designed to attract people of all ages and backgrounds to enhance our thriving local community. Prioritise affordable housing for residents with a ‘local connection’, young and old.”*
- 3.22 Page 33 sets out an indicated supply of affordable housing for the Parish. Four sites are stated as providing a total of 141 homes. It is however important to recognise that only the ‘Land north of Burton Street’ site has full planning permission (P/RES/2022/05524). The remaining three sites currently only have outline permission, two of which do not have live reserved matters applications. None of the sites are allocations.
- 3.23 The Burton Street site is the only site in the Council’s latest Five Year Housing Land Supply Statement (see Section 7 of this evidence) providing affordable housing in the Parish. This development is expected to deliver a total of 25 gross affordable homes over the period, averaging five per year.

- 3.24 Paragraph 8.6 (page 35) states that the Parish's affordable housing need is evidenced by the Housing Register, which records 11 households with a local connection. It goes on to consider that *"Whilst not everyone in need will be on the Housing Register, the projected supply of affordable homes (in excess of 140 homes) is much greater."*
- 3.25 This data is supplemented by an 'assessment' of affordable housing needs on page 103. In addition to the 11 households with a local connection the data highlights that on 28 January 2025 there were **89 households** on the Council's Housing Register that had specified Marnhull Civil Parish as a preferred choice of location. This represents a 44% increase from the 62 households identified in the Council's FOI response (**Appendix AG1**).
- 3.26 While this data provides insight into the current need for social and affordable rented housing in the parish, it does not account for need over the 15-year plan period. Nor does it consider the need for the range of other affordable tenures outlined in Annex 2 of the NPPF. Therefore, while a useful indicator of present need, this data does not constitute a formal assessment of affordable housing need.
- 3.27 Criterion D of emerging Policy 7 'Meeting Local Housing Needs' considers affordable housing provision within the parish noting that:
- "Affordable home sizes should seek to meet the requirements of eligible households with a local connection to Marnhull parish, as recorded in the Dorset Council affordable housing register at the time the application is considered, and including affordable homes for first time buyers. Where affordable housing is provided, this should be tenure-blind and made on the basis of prioritising people in housing need who have a local connection to the Neighbourhood Plan area (based on the local connection criteria of the Dorset Housing Allocations Policy), cascading out to the adjoining parishes, and only then to the wider Dorset Council area if there is no local need."*
- 3.28 Given the early stages of the Neighbourhood Plan, it holds limited weight in the determination of the appeal proposals.

### **Corporate Documents**

- 3.29 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority. These include the following documents:
- Dorset Council Housing Strategy 2024 to 2029 (**CD5.005**); and
  - Dorset Council Homelessness and Rough Sleeping Strategy 2021 to 2026 (**CD5.006**).

### **Conclusions**

- 3.30 The relevant Development Plan in respect of affordable housing for the appeal site comprises North Dorset Local Plan Part 1 (January 2016).
- 3.31 The evidence set out in this section clearly highlights that within adopted policy, and a range of other plans and strategies, providing affordable housing has long been

established as, and remains, a key issue which urgently needs to be addressed within North Dorset and Dorset more widely.

- 3.32 The appeal proposals provide an affordable housing contribution which meets requirements of Policy 8 in terms of quantum and mix.
- 3.33 The up to 48 affordable homes at the appeal site will make a significant contribution towards meeting the annual affordable housing needs of the Dorset, particularly when viewed in context of poor past rates of affordable housing delivery which is considered in more detail in Section 5 and inadequate future supply as identified in Section 7 of this evidence.

## 4. Affordable Housing Needs

### Introduction

- 4.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base for the former North Dorset Council area, as well as a more recent assessment of affordable housing need for the wider Dorset Council area in order to provide a comprehensive understanding of formally identified affordable housing needs across Dorset.
- 4.2 In addition to formal Local Housing Need Assessments ('LHNAs'), this section examines other indicators of affordable housing need such as the number of households on the Housing Register, households housed in temporary accommodation and homelessness rates. These real-world metrics offer additional insights and perspective on the pressing need for affordable housing in Dorset.

### Local Housing Need Assessments

#### **Bournemouth/Poole Strategic Housing Market Assessment Update (January 2012) – CD5.007**

- 4.3 The Bournemouth/Poole Strategic Housing Market Assessment Update published January 2021 ('2012 SHMA') provides an update to the 2007 Strategic Housing Market Assessment SHMA for the Bournemouth/Poole Housing Market Area ('HMA'); covering the six former local authorities of Bournemouth, Christchurch, East Dorset, North Dorset, Poole, and Purbeck.
- 4.4 The 2012 SHMA calculates housing need for the respective authorities over the 5-year period from 2011/12 to 2015/16 and forms part of the evidence base for LPP1<sup>2</sup>.
- 4.5 Figure 6.16 on page 80 of the 2012 SHMA identifies a housing need of **387 net affordable homes per annum between 2011/12 to 2015/16** for the former North Dorset Council area, equivalent to 1,935 dwellings over the 5-year assessment period.
- 4.6 It is however important to highlight that the 2012 SHMA was prepared prior to the implementation of the updated Annex 2 definition of affordable housing in the revised NPPF (now December 2024 version). As such it does not account for the range of affordable routes to home ownership included within the current definition of affordable housing.
- 4.7 If these households were also to be factored into the calculation of affordable housing need it is likely that the net affordable housing need figure for North Dorset would increase further.

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<sup>2</sup> As set out at paragraphs 5.77 to 5.79 of LPP1

## **Dorset and Bournemouth, Christchurch, and Poole Local Housing Needs Assessment (November 2021) – CD5.008**

- 4.8 Following the establishment of the Dorset Unitary Authority in 2019, Dorset Council commissioned the Dorset and Bournemouth, Christchurch, and Poole Local Housing Needs Assessment ('the 2021 LHNA').
- 4.9 The 2021 LHNA provides the most recent evidence of affordable housing need for Dorset and forms part of the evidence base for the emerging Dorset Local Plan.
- 4.10 In assessing the need for affordable housing in Dorset, the 2021 LHNA calculates the need for social/affordable rented accommodation and the need for affordable home ownership tenures separately:
- Table 7.29 on page 107 identifies an annual affordable housing need of 950 net social/affordable rented homes across Dorset over the 18-year period from 2021/22 to 2037/38.
  - Furthermore, Table 7.40 on page 117 identifies an annual affordable housing need of 767 net affordable home ownership homes across Dorset over the 18-year period from 2021/22 to 2037/38.
- 4.11 When combining the identified needs for social/affordable rented accommodation (950pa) and affordable home ownership homes (767pa) **in Dorset, there is an ongoing total net need for 1,717 affordable homes per annum over the 18-year period from 2021/22 to 2037/38.** This equivalent to **30,906** new affordable dwellings over the period.
- 4.12 It is noted that the 2021 LHNA also identifies affordable housing need by 'sub-area', including the 'Northern Dorset' sub-area in which the appeal site lies.
- 4.13 Table 7.29 on page 107 identifies that there is an affordable housing need of 144 net social/affordable rented homes per annum in the 'Northern Dorset' sub-area over the 18-year period from 2021/22 to 2037/38.
- 4.14 Table 7.40 on page 117 identifies that there is an affordable housing need of 115 net affordable home ownership homes per annum in the Northern Dorset' sub-area over the 18-year period from 2021/22 to 2037/38.
- 4.15 When combining the identified needs for social/affordable rented accommodation (144 pa) and affordable home ownership homes (115 pa) in the Northern Dorset' sub-area, there is an on-going **total need for 259 net affordable homes per annum** over the 18-year period from 2021/22 to 2037/38.

### **Indicators of Affordable Housing Need**

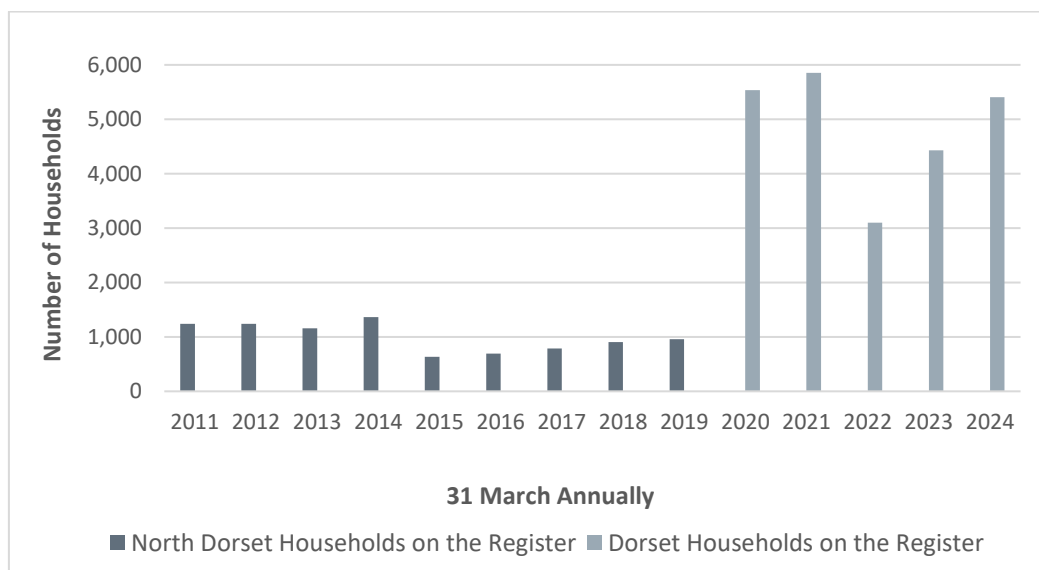
- 4.16 Key indicators like the number of households on the Councils Housing Register, homelessness rates and households housed in temporary accommodation all serve as crucial markers of current affordable housing need in Dorset.

- 4.17 The data in this section has been obtained from Ministry of Housing Communities & Local Government (MHCLG) published statistics and incorporates data provided in the Council's FOI response (**Appendix AG1**).

### Housing Register

- 4.18 On 31 March 2024 there were **5,406 households** on the Council Housing Register. This represents a 22% increase from the previous year where the figure stood at 4,430 households. 39% of households (2,131) on the Housing Register on 31 March 2024 had at least one dependent child.
- 4.19 It is also relevant to note that in January 2025 the Council published a 'State of Dorset Housing' in 2024 report (**Appendix AG4**). It highlights that as of 31 October 2024 the Councils Housing Register stood at 6,536 households, a 21% increase in just 7 months.
- 4.20 Figure 4.1 below illustrates the trend in the number of households on the North Dorset Housing Register from 31 March 2011<sup>3</sup> to 31 March 2018 and the Dorset Housing Register between 31 March 2019<sup>4</sup> and 31 March 2024.

*Figure 4.1: Number of Households on the Housing Register in North Dorset and Dorset, 31 March 2011 to 31 March 2024*



Source: MHCLG Open Data.

- 4.21 The Localism Act 2011, which came into force in 2012, gave local authorities the power to set their own qualification criteria determining who may or may not go onto the housing waiting list. Previously, local authorities were only able to exclude from their waiting list people deemed guilty of serious unacceptable behaviour. The MHCLG data set acknowledges that *"The Localism Act 2011, has contributed to a decrease in the size of waiting lists, as it allowed local authorities to set their own qualification criteria"*.

<sup>3</sup> Start of Local Plan Part 1 period

<sup>4</sup> Formation of Dorset Council UA

- 4.22 Following the 2012 changes brought about by the Localism Act, Dorset Unitary Authority published a revised Housing Allocations Scheme on 1 October 2021. As shown in Figure 4.1, this revision coincided with a significant reduction in the number of households on the Dorset Housing Register from 5,853 households on 31 March 2021 to 3,100 households on 31 March 2022. Notably, following the sharp drop in 2022, the number of households on the Housing Register has steadily increased each year, highlighting a growing and persistent demand for housing support in spite of the stricter eligibility criteria.
- 4.23 The Council's FOI response shows that successful applicants for affordable housing face lengthy waits for an affordable home. Table 4.1 illustrates that, based on the dwelling size, successful applicants in the 2023/24 period who were on the Housing Register experienced average waiting times ranging from 275 days to 544 days for an affordable home.

*Table 4.1: Housing Register Average Waiting Times, 1 April 2023 and 31 March 2024*

Type of affordable property	Average Waiting Times (2023/24)
1-bed affordable property	275 days
2-bed affordable property	241 days
3-bed affordable property	376 days
4+ bed affordable property	544 days

*Source: Freedom of Information response.*

- 4.24 It is crucial to note that these figures represent averages, implying that some households may have been waiting even longer than the indicated times. Additionally, these statistics only capture the waiting times for successful applicants, typically those in the highest priority need. Households with less urgent needs can anticipate significantly lengthier waiting periods.
- 4.25 At a local level the Council's FOI response (**Appendix AG1**) highlights that as of 4 April 2024<sup>5</sup> there were **62 households** on the Council's Housing Register that had specified Marnhull Civil Parish as a preferred choice of location. Table 4.2 below demonstrates the average number of bids per property let in Marnhull Civil Parish over the 2023/24 monitoring period for a range of types of affordable property.

<sup>5</sup> Closest date available to 31 March 2024

Table 4.2: Bids Per Property, April 2023 to March 2024

Type of affordable property	Marnhull Civil Parish	
	Number of properties advertised	Average Bids per Property
1-bed affordable property	Nil	N/A
2-bed affordable property	Nil	N/A
3-bed affordable property	1	109
4+ bed affordable property	2	64
<b>Totals</b>	<b>3</b>	<b>173</b>

Source: Freedom of Information response.

- 4.26 Table 4.2 demonstrates that between 1 April 2023 to 31 March 2024 there were 109 bids for the one 3-bed affordable dwelling put up for let in the parish and 64 average bids for the two 4+ bed affordable dwellings advertised. There were no 1-bed or 2-bed affordable dwellings advertised over the period.
- 4.27 For every successful letting, there are tens, sometimes hundreds, of households left without access to an affordable home, highlighting the significant gap between demand and supply. This underscores an urgent and pressing need for increased availability of affordable housing to address the unmet demand and support those waiting for a place to call home.

#### Temporary Accommodation

- 4.28 Temporary accommodation is intended to provide an immediate, short-term housing solution for individuals and families facing homelessness or urgent housing needs.
- 4.29 On 31 March 2024, there were **261 households** living in temporary accommodation, 46% of which included at least one dependent child. On this date, a total of **289 children** were being housed in temporary accommodation by the Council. Table 4.3 below shows the type of accommodation these households were housed in.



*Table 4.3: Number households in temporary accommodation by accommodation type, 31 March 2024*

Accommodation Type	Number of Households	%age of Total
Bed and breakfast hotels (including shared annexes)	80	31%
Nightly paid, privately managed accommodation, self-contained	16	6%
Hostels (including reception centres, emergency units and refuges)	25	10%
Leased Private sector accommodation	67	26%
Local authority or Housing association stock	67	26%
Any other type of temporary accommodation	6	2%
<b>Total</b>	<b>261</b>	<b>100%</b>

*Source: MHCLG Open Data.*

- 4.30 The data in Table 4.3 demonstrates that just 26% of households in 2023/24 were housed in Local authority or Housing Association stock, indicating significant taxpayer spend on private sector solutions. MHCLG data highlights that the Council spent **£6,921,000 on temporary accommodation** between 1 April 2022 and 31 March 2023. This figure rose by 2% between 1 April 2023 and 31 March 2024 to **£7,077,000** with 85% being spent on Hostels (including reception centres, emergency units and refuges).
- 4.31 The remaining 74% of households were housed in various forms of temporary accommodation, including bed and breakfast hotels (31%), privately managed nightly paid accommodation (6%), and hostels (10%). These types of accommodation are often unsuitable for long-term living, with issues such as overcrowding, lack of privacy, and limited access to essential facilities. This reliance on temporary private sector solutions underscores the inadequate provision of stable and affordable housing to meet the needs of vulnerable households.
- 4.32 The above evidence demonstrates the pressing need for an increase in rented affordable housing stock to reduce dependency on costly private sector accommodations and provide more stable and suitable housing solutions for households in temporary accommodation. Such an increase would not only alleviate financial pressures on public resources but also offer vulnerable households a greater sense of security and community stability, contributing to improved long-term social and economic outcomes.

### **Homelessness**

- 4.33 Homelessness is a critical social challenge, reflecting broader issues of housing affordability, availability, and support for vulnerable populations. Authorities have a statutory duty under the Homelessness Reduction Act 2017 to prevent and relieve homelessness:
- 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.

- 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.

4.34 As demonstrated by Table 4.4 below, in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted **762 households** in need of homelessness prevention duty, and a further **645 households** in need of relief duty from the Council.

*Table 4.4: Number households owed a homeless duty by reason for loss of last settled home, 1 April 2023 to 31 March 2024*

Reason for loss of last settled home	Prevention duty		Relief duty	
	No. Households	%age	No. Households	%age
Family or friends no longer willing or able to accommodate	202	27%	192	30%
End of private rented tenancy - assured shorthold	282	37%	73	11%
Domestic abuse	62	8%	118	18%
Non-violent relationship breakdown with partner	28	4%	79	12%
End of social rented tenancy	54	7%	12	2%
Eviction from supported housing	19	2%	21	3%
End of private rented tenancy - not assured shorthold	37	5%	29	4%
Other violence or harassment	6	1%	15	2%
Left institution with no accommodation available	10	1%	47	7%
Home no longer suitable - disability / ill health	14	2%	17	3%
Other reasons / not known	48	6%	42	7%
<b>Totals</b>	<b>762</b>	<b>100%</b>	<b>645</b>	<b>100%</b>

*Source: MHCLG Open Data.*

4.35 The data highlights distinct patterns in the reasons for the loss of settled homes among households receiving Prevention Duty support. For those under Prevention Duty, the most common reason was the end of private rented tenancies under assured shorthold agreements, accounting for 37% of cases. This indicates a significant reliance on the private rental sector, which is often subject to instability due to factors such as rising rents, lack of tenant protections, and landlords choosing to sell their properties. Additionally, 27% of cases involved family or friends no longer being willing or able to accommodate, reflecting the fragility of informal housing arrangements and the broader lack of affordable housing options.

- 4.36 Under Relief Duty, the data shifts to emphasize crisis-driven causes of homelessness. While family or friends no longer being able to accommodate remains a prominent factor at 30%, there is a marked increase in cases involving domestic abuse, which accounts for 18% of households under Relief Duty. This indicates that individuals experiencing domestic abuse often find themselves in urgent and vulnerable situations, requiring immediate support to ensure their safety and stability. Non-violent relationship breakdowns with partners also feature more prominently under Relief Duty (12%) compared to Prevention Duty, emphasizing the significant housing challenges that can arise from unexpected changes in personal relationships.

### **Conclusions**

- 4.37 The 2012 SHMA which underpins the LPP1, indicates a net need for 387 new affordable homes annually across the former North Dorset Local Council area, totalling 1,935 homes over the 5 year period between 2011/12 and 2015/16.
- 4.38 The latest evidence for affordable housing need in Dorset is contained within the 2021 LHNA, identifying a net need for 1,717 new affordable homes each year across Dorset between 2021/12 and 2037/38, equivalent to 30,906 new affordable dwellings over the 18-year period.
- 4.39 Additional indicators, including the substantial rise in the number of households on the Housing Register, high homelessness rates, and the reliance on temporary accommodation, further underscore the severity of the issue. The data shows that demand for affordable housing continues to outpace supply, placing financial strain on public resources and leaving many households in unstable living conditions.
- 4.40 In this context, the provision of affordable housing at the appeal site would directly contribute to addressing the well-documented local housing need. It would align with both the objectives set out in LPP1 and national planning policies that seek to significantly boost the supply of affordable homes. Given the persistent and growing demand for affordable housing, the appeal proposal represents an important opportunity to deliver much needed accommodation and alleviate housing pressures.

## 5. Past Affordable Housing Delivery

### Introduction

- 5.1 This section reviews past rates of affordable housing delivery across the former North Dorset Council area and Dorset Council, revealing significant and persistent shortfalls against identified needs. These findings underscore the urgent and pressing need for a substantial increase in affordable housing provision throughout Dorset.
- 5.2 The analysis in this section is underpinned by the data tables provided at **Appendix AG5**, which have been compiled from Ministry of Housing Communities & Local Government ('MHCLG') published statistics. It also incorporates data provided in the Council's FOI response (**Appendix AG1**).

### Additions to Affordable Housing Stock

- 5.3 Since the start of the LPP1 period in 2011/12, through to the merger of the former Council areas at the end of the 2018/19 monitoring period, there were a total of 493 gross affordable dwellings added to housing stock in the former North Dorset Council area, equivalent to 62 new dwellings per annum. When compared with the total net housing completions figure of 1,684 dwellings, gross affordable housing delivery has represented 29% of additions.
- 5.4 In an October 2024 WMS on 'Social and Affordable Housing', Deputy Prime Minister Angela Rayner MP made clear that:

*"These measures to increase affordable housing come alongside changes to the Right to Buy scheme. **England's existing social housing supply is depleted every year by the scheme** while also disincentivising councils to build new social housing. To address this, the Chancellor will confirm at Budget that councils will be able to retain 100% of the receipts generated by Right to Buy sales. **This will enable councils to scale-up delivery of much needed social homes whilst still enabling longstanding tenants to buy their own homes**" (emphasis added).*

- 5.5 Similarly in her closing speech at the Social Housing Conference on 20 November 2024 the Deputy Prime Minister was clear that:

*"I want to say loud and clear that no longer will social housing be seen as an after-thought, or worse actively discouraged. [...] It starts by going **net positive** because we want to build more social homes than we lose. This matters. For the 1.2 million households on the waiting list for a safe and secure home. For the 150,000 children stuck in unsuitable temporary accommodation. [...] And as I said, this is personal for me. Because I know **that a secure, affordable home is not a luxury or simply nice to have. It's the foundation on which everything else is built.**" (emphasis added).*

- 5.6 Whilst the gross data from MHCLG accounts for new build affordable dwellings and acquisitions from the private sector, it does not account for any reductions in affordable housing stock due to demolitions or Right to Buy sales from Council and/or RP affordable housing portfolios. Table 5.1 below illustrates the effect of Right to Buy sales on gross additions in the former North Dorset Council area between 2011/12 and 2018/19.

*Table 5.1: Net Additions to Affordable Housing Stock in the former North Dorset Council area, 2011/12 to 2018/19*

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2011/12	144	0	144
2012/13	57	13	44
2013/14	103	13	90
2014/15	81	9	72
2015/16	44	2	42
2016/17	52	2	50
2017/18	9	2	7
2018/19	3	1	2
<b>Totals</b>	<b>493</b>	<b>42</b>	<b>451</b>
<b>Avg. Pa.</b>	<b>62</b>	<b>5</b>	<b>56</b>

*Source: MHCLG Open Data*

- 5.7 The data highlights that over the 8-year period there has been a total of 42 losses to affordable housing stock through the Right to Buy, this represents 9% of gross additions. When the effect of the Right to Buy is taken in to account just 451 net affordable homes were delivered over the period, equivalent 56 dwellings per annum. This represents 27% of total net housing additions. This figure is likely to fall even further if demolitions were taken into account<sup>6</sup>.
- 5.8 Since the formation of Dorset Council at the beginning of the 2019/20 monitoring period the Council has added a total of 1,178 gross affordable dwellings to its housing stock, equivalent to just 236 new dwellings per annum. When compared with the total net housing completions figure of 7,804 dwellings, gross affordable housing delivery has represented just 15% of additions. Table 5.2 below illustrates the effect of Right to Buy sales on gross additions in the Dorset Council area between 2019/20 and 2023/24.

<sup>6</sup> MHCLG does not provide affordable housing demolition data at local authority level.

*Table 5.2: Net Additions to Affordable Housing Stock in the Dorset Council area, 2019/20 to 2023/24*

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2019/20	206	17	189
2020/21	167	11	156
2021/22	196	15	181
2022/23	296	10	286
2023/24	313	3	310
<b>Totals</b>	<b>1,178</b>	<b>56</b>	<b>1,122</b>
<b>Avg. Pa.</b>	<b>236</b>	<b>11</b>	<b>224</b>

Source: MHCLG Open Data

- 5.9 The data highlights that over the 5-year period there has been a total of 56 losses to affordable housing stock through the Right to Buy, this represents 5% of gross additions. When the effect of the Right to Buy is taken in to account just 1,122 net affordable homes were delivered over the period, equivalent 224 dwellings per annum. This represents 14% of total net housing additions. Again, this figure is likely to fall even further if demolitions were taken into account.

### Net Additions vs Net Needs

- 5.10 When comparison is draw between the affordable housing needs identified in the 2012 SHMA for the former North Dorset Council area, a cumulative shortfall of 1,543 net affordable homes has accrued in the 5-year period between 2011/12 and 2015/16. It is however important to recognise that the findings of this assessment are significantly out of date and do not reflect the current definition of affordable housing nor the housing needs of the Dorset Council area as a whole.
- 5.11 Table 5.3 calculates the current cumulative shortfall against the affordable housing needs identified in the 2021 LHNA for the Dorset Council area.

*Table 5.3: Net Additions Compared to Needs Identified in 2021 LHNA for the Dorset Council area, 2021/22 to 2023/24*

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	181	1,717	-1,536	-1,536	11%
2022/23	286	1,717	-1,431	-2,967	17%
2023/24	310	1,717	-1,407	-4,374	18%
Total	777	5,151	-4,374		15%
Avg. Pa	259	1,717	-1,458		

Source: MHCLG Open Data; and 2021 HNA.

- 5.12 Table 5.3 demonstrates that in the 3-year period since the start of the 2021 LHNA period in 2021/22 the Council has delivered just 777 net affordable homes. This has resulted in a cumulative shortfall of 4,374 affordable homes against a need for 5,151. The average annual delivery of 259 affordable homes per annum starkly contrasts with the identified need of 1,717 affordable homes per year. In percentage terms 15% of needs were met over the period, i.e. 85% of identified needs when unmet.

### **Addressing the Shortfall**

- 5.13 In my view, the scale of the shortfall, combined with the substantial number of households on the Council's Housing Register, underscores an urgent and pressing need for affordable housing. The 5,406 households on the Councils Housing Register are in need of an affordable home *now*; as are the 289 children in temporary accommodation.
- 5.14 As such, the aim should be to meet the shortfall in affordable housing provision as soon as possible i.e. over the next five years, in line with the approach set out in the NPPG<sup>7</sup> for overall housing shortfalls. A summary of SoS and Inspectors appeal decisions that support this approach is provided at **Appendix AG6**.
- 5.15 To clear the 4,374 dwelling shortfall accumulated between 2021/22 and 2023/24, the Council would need to deliver 2,592<sup>8</sup> net affordable dwellings per annum over the next five years (2024/25 to 2028/29), representing a 51% increase from the annual need of 1,717 net affordable dwellings identified in the 2021 LHNA. Without a step change in affordable housing delivery this is unlikely to be realised.

### **Affordable Housing Delivery in Marnhull Civil Parish**

- 5.16 Table 5.4 illustrates the delivery of affordable housing in Marnhull Civil Parish over the eight-year period since the start of the start of the LPP1 period in 2011/12.

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<sup>7</sup> Paragraph: 031 Reference ID: 68-031-20190722

<sup>8</sup>  $4,374 / 5 \text{ years} = 874.8 + 1,717 = 2,592$

*Table 5.4: Gross Additions to Affordable Housing Stock in Marnhull Civil Parish, 2019/20 to 2023/24*

Monitoring Period	Housing Completions (Net)	Affordable Housing Completions (Gross)
2011/12	1	0
2012/13	3	0
2013/14	6	0
2014/15	1	0
2015/16	2	0
2016/17	1	0
2017/18	9	0
2018/19	15	3
2019/20	9	5
2020/21	8	0
2021/22	1	0
2022/23	11	0
2023/24	8	0
<b>Total</b>	<b>75</b>	<b>8</b>
<b>Avg. Pa</b>	<b>6</b>	<b>1</b>

*Source: FOI Response*

- 5.17 Over the period there has been a total of 75 net overall housing completions and 8 affordable housing completions in the Parish. Losses to existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.
- 5.18 Affordable housing delivery in the Parish should be viewed in context of the fact that as of 4 April 2024 there were 62 households on the councils Housing Register specifying Marnhull Civil Parish as a preferred choice of location. This is likely to underestimate demand for affordable housing given in 2023/24 there were just three properties let in the Parish which received an average of 173 bids.

## Conclusions

- 5.19 The evidence demonstrates that affordable housing delivery in both the former North Dorset Council area and the wider Dorset Council has persistently fallen short of meeting identified affordable housing needs. Only 15% of the Dorset wide annual affordable housing need identified in the 2021 LHNA has been met since 2021/22. This means 85% of households did not have their needs met over the period due to the Councils inability to deliver affordable homes at the required level.



- 5.20 The cumulative shortfall of 4,374 affordable homes since 2021/22 presents a significant challenge, particularly given the growing number of households on the Housing Register and high levels of homelessness. The data shows a clear failure to deliver at the scale required to address housing pressures, resulting in a heavy reliance on costly private-sector solutions for temporary accommodation.
- 5.21 The Council would need to increase its affordable housing delivery to 2,592 net dwellings per annum over the next five years just to clear the existing shortfall, a 51% increase on the annual need identified in the 2021 LHNA. Given past trends, this is unlikely to be achieved without a fundamental shift in housing delivery strategies, including maximising opportunities for new affordable housing development.
- 5.22 The evidence strongly supports the urgent need for additional affordable housing, particularly in light of government commitments to prioritising social and affordable housing provision. Without a step change in delivery, housing need in Dorset will continue to grow, worsening affordability challenges and increasing pressure on local housing services. The appeal proposal represents an important opportunity to contribute towards addressing this critical shortfall and delivering much-needed affordable homes in line with national and local policy objectives.

## 6. Market Conditions

### Introduction

- 6.1 The NPPF is clear that all households whose needs are not met by the market (either to rent or to buy) are considered to be in affordable housing need. This section analyses past and current market conditions in both the rental and ownership segments of the market to understand the nature of the housing market in Dorset.

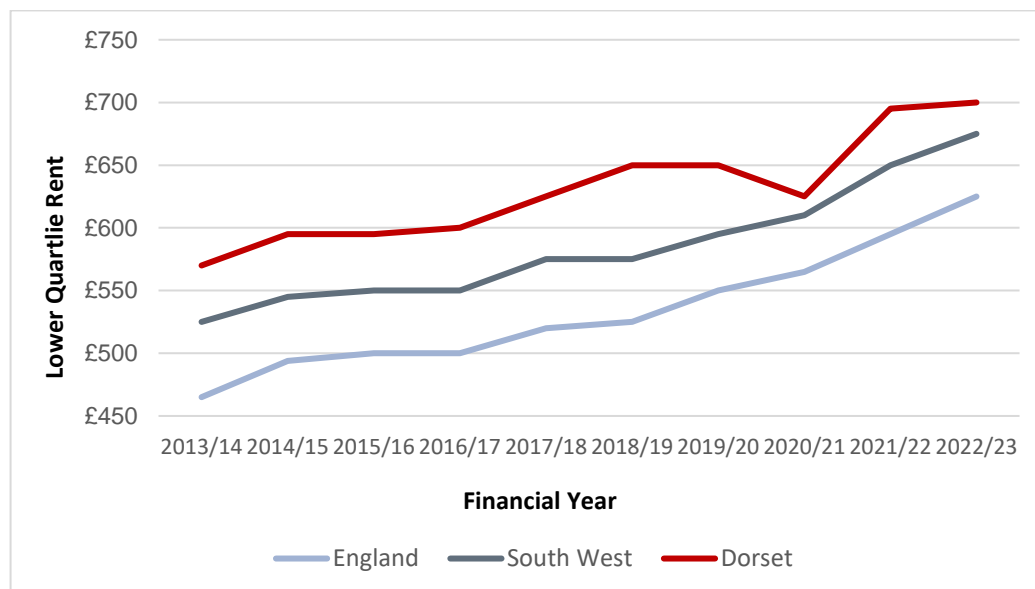
### Private Rental Market

- 6.2 The following analysis relies on Office for National Statistics (ONS) Private Rental Market Statistics (formerly produced by the Valuation Office Agency (VOA)), first published in 2013/14. The data includes both existing and new lets, meaning it may not fully reflect costs faced by new tenants in Dorset.

- 6.3 Figure 6.1 below shows the following trends in the lower quartile segment of the private rental market, representing entry-level rental prices:

- Lower quartile rents in Dorset increased by 23% between 2013/14 and 2022/23, rising from £570 pcm to £700 pcm.
- Lower quartile rents in Dorset have been consistently significantly above both the national and regional figures.
- Lower quartile rents in Dorset were 4% higher than the regional figure (£675pcm) and 12% higher than the national figure (£625 pcm) in 2022/23.

Figure 6.1: Lower Quartile Private Sector Rents, 2013/14 to 2022/23

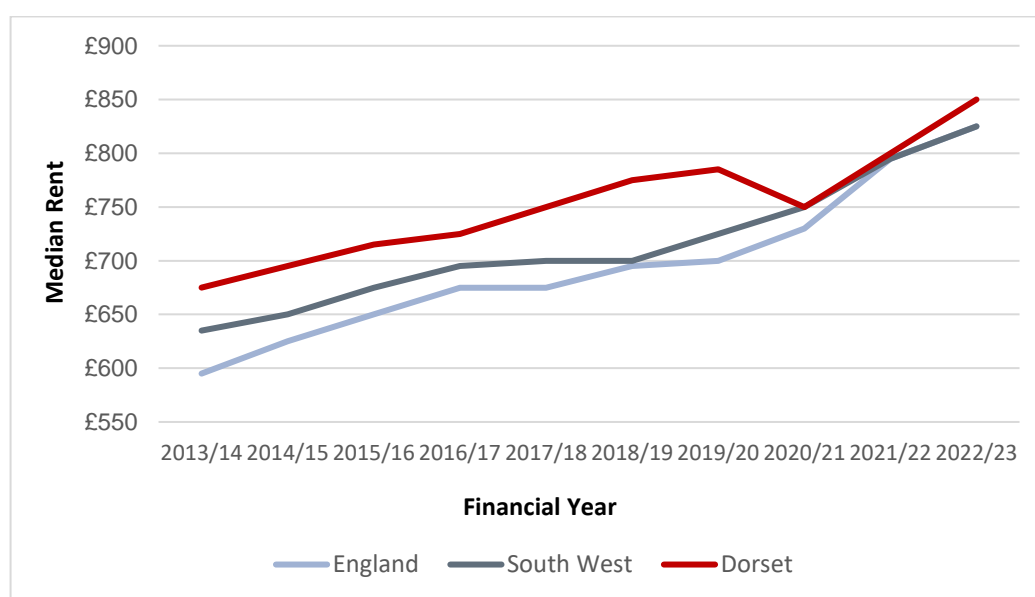


Source: VOA Open Data; and ONS Open Data.

6.4 Figure 6.2 below shows the following trends in the median segment of the private rental market, representing the midpoint of rental prices, across Dorset over the period:

- Over the period there has been a 26% increase in median rents, from £675 pcm to £850 pcm.
- As with lower quartile rents, median rents in Dorset have been consistently above both the national and regional figures, apart from in 2021/22 where the regional and Dorset figures both stood at £750 pcm.
- Median rents in Dorset are 3% higher than the regional figure and national figure of £825 pcm in 2022/23.

Figure 6.2: Median Private Sector Rents, 2013/14 to 2022/23



Source: VOA Open Data; and ONS Open Data.

6.5 The analysis of the private rental market in Dorset highlights significant and sustained increases in rental costs over the past decade. Lower quartile rents, which represent entry-level rental prices, have risen by 23% from £570 pcm in 2013/14 to £700 pcm in 2022/23, consistently exceeding both regional and national averages. Similarly, median rents have increased by 26% over the same period, reaching £850 pcm in 2022/23. This trend underscores the growing affordability pressures faced by renters in Dorset, with rental costs outpacing both national and regional figures, making it increasingly difficult for lower income households to access affordable private sector housing.

### Homeownership Market

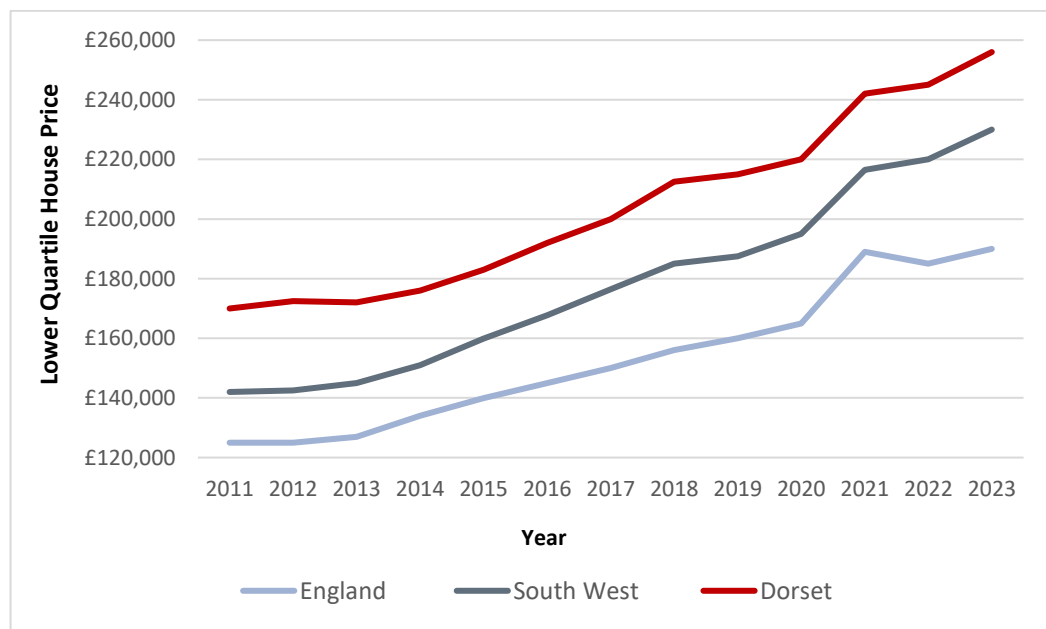
6.6 The ONS publishes annual house price and earnings data for affordability ratios at the lower quartile and median levels. The median affordability ratio is key component in the Standard Method calculation for determining Local Housing Need.

### Lower Quartile House Prices

6.7 Figure 6.3 below identifies the following trends in lower quartile house prices, representing entry-level housing costs, across Dorset since the start of the LPP1 period in 2011:

- Lower quartile house prices in Dorset rose by 51% over the period from £170,000 in 2011 to £256,000 in 2023.
- Lower quartile house prices have been consistently significantly above both the national and regional figures.
- Dorset lower quartile house prices are 11% higher than the regional average (£230,000) and 35% higher than the national average (£190,000).

Figure 6.3: Lower Quartile House Prices, 2011 to 2023

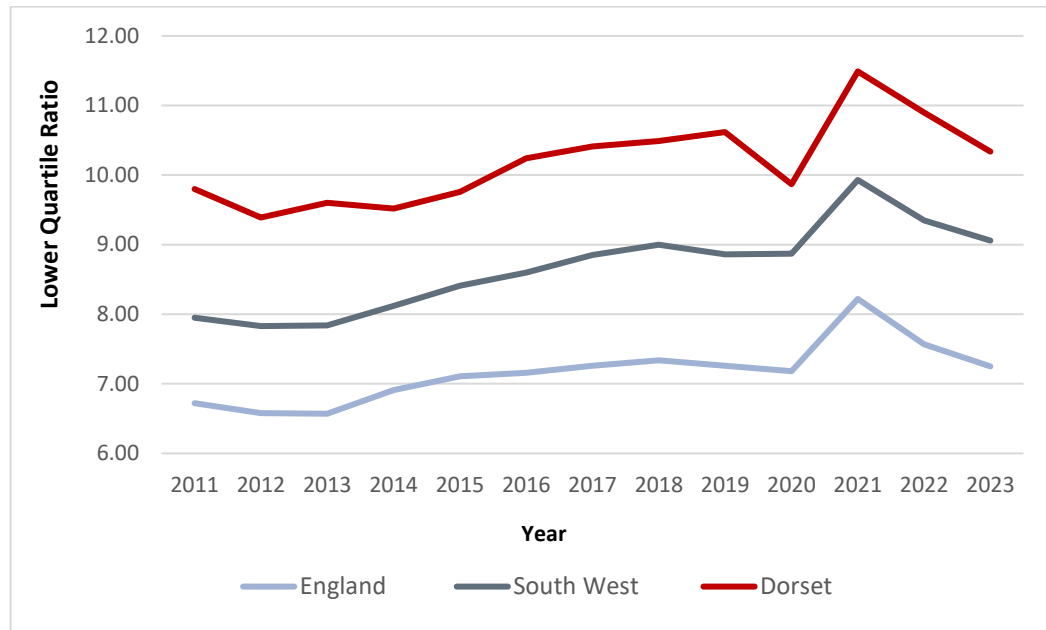


Source: ONS Open Data.

6.8 It is important to consider lower quartile house prices in context of lower quartile incomes. Figure 6.4 below compares the workplace-based lower quartile affordability ratio for Dorset against regional and national averages over the period, highlighting the following trends:

- The lower quartile ratio in Dorset rose by 6% over the period from 9.80 in 2011 to 10.34 in 2023.
- The lower quartile income to house price ratio across Dorset has been consistently significantly above both the national and regional figures.
- The Dorset lower quartile ratio is 14% higher than the regional figure (9.06) and 43% higher than the national figure (7.25).

Figure 6.4: Lower Quartile Workplace-Based Affordability Ratio comparison, 2011 to 2023



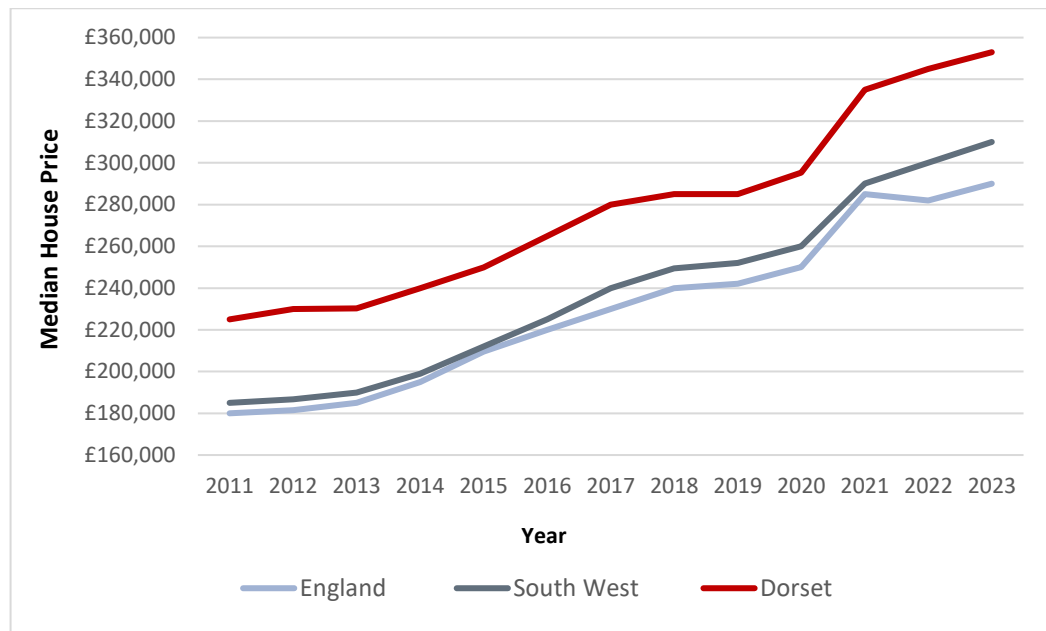
Source: ONS Open Data.

- 6.9 The analysis of lower quartile house prices in Dorset reveals a sharp increase in entry-level housing costs, rising by 51% from £170,000 in 2011 to £256,000 in 2023. Throughout this period, lower quartile house prices in Dorset have remained significantly above both national and regional averages, with prices currently 11% higher than the regional figure and 35% higher than the national figure. When assessed against lower quartile incomes, affordability has worsened, with the lower quartile house price-to-income ratio increasing from 9.80 in 2011 to 10.34 in 2023. This affordability ratio remains substantially higher than both regional and national figures, underscoring the growing challenge for lower-income households in Dorset to access homeownership.

### Median House Prices

- 6.10 Figure 6.5 below shows trends in median house prices, representing the midpoint of the housing market, across Dorset since the start of the LPP1 period in 2011:
- Median house prices in Dorset rose by 57% over the period from £225,000 in 2011 to £353,000 in 2023.
  - Median house prices have been consistently above both the national and regional figures.
  - Dorset median house prices are 14% higher than the regional average (£310,000) and 22% higher than the national average (£290,000).

Figure 6.5: Median House Prices, 2011 to 2023

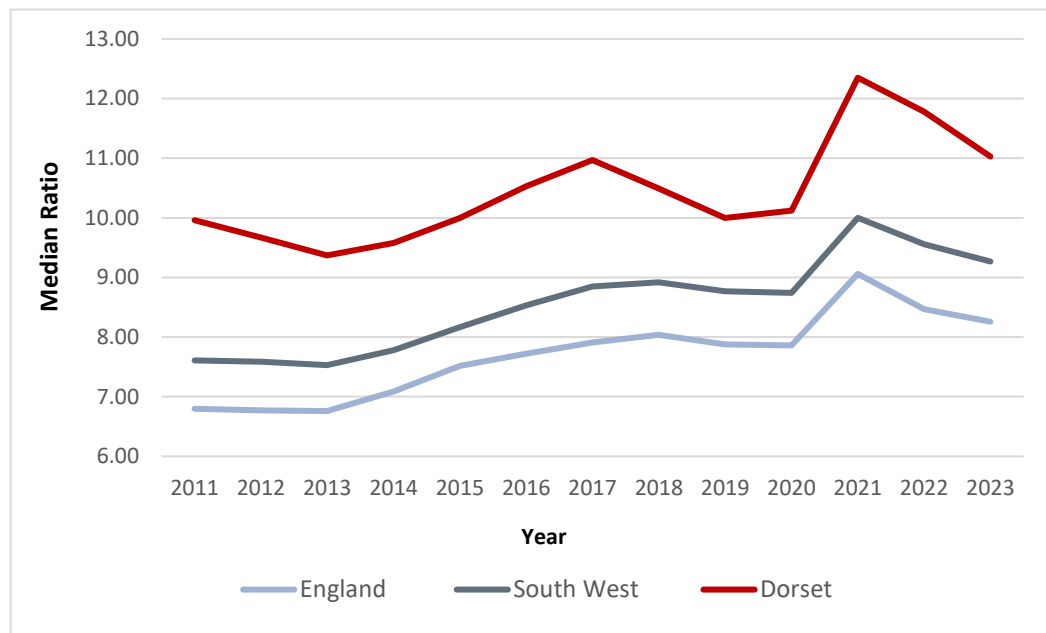


Source: ONS Open Data.

6.11 Analysing the affordability of median house prices requires placing them in the context of median incomes. Figure 6.6 below illustrates the workplace-based median affordability ratio for Dorset compared to regional and national averages over the period highlighting the following trends:

- The median ratio in Dorset rose by 11% over the period from 9.96 in 2011 to 11.03.
- The median income to house price ratio across Dorset has been consistently significantly above both the national and regional figures.
- The Dorset median ratio is 19% higher than the regional figure (9.27) and 34% higher than the national figure (8.26).

Figure 6.6: Median Workplace-Based Affordability Ratio comparison, 2011 to 2023



Source: ONS Open Data.

- 6.12 The analysis of median house prices in Dorset highlights a significant rise in housing costs, with prices increasing by 57% from £225,000 in 2011 to £353,000 in 2023. Median house prices in Dorset have consistently remained above both regional and national averages, currently standing 14% higher than the regional figure and 22% higher than the national figure. Affordability has also worsened over this period, with the median house price-to-income ratio rising from 9.96 in 2011 to 11.03 in 2023. This ratio remains significantly above regional and national levels, indicating that homeownership is becoming increasingly out of reach for many households in Dorset, exacerbating affordability pressures and reinforcing the need for increased affordable home ownership provision.

## Conclusions

- 6.13 The analysis of market conditions in Dorset highlights a persistent affordability crisis in both the private rental and homeownership sectors. Rental costs have risen significantly, with lower quartile rents increasing by 23% and median rents by 26% since 2013/14, consistently exceeding national and regional figures. This upward trend has made access to private rental housing increasingly difficult, particularly for lower-income households.
- 6.14 In the homeownership market, lower quartile house prices have surged by 51% since 2011, while median house prices have risen by 57%. Affordability ratios have also worsened, with lower quartile and median house price-to-income ratios significantly higher than both regional and national averages. These trends indicate that homeownership is becoming increasingly unattainable for many households in Dorset, exacerbating the demand for affordable housing solutions.

## 7. Future Supply of Affordable Housing

### Introduction

- 7.1 This section focuses on the future supply of affordable housing in Dorset, analysing the Councils projected delivery against identified needs. Drawing on the latest Five-Year Housing Land Supply (5YHLS) trajectory and planning permissions data, it evaluates the extent to which planned developments can address Dorset's shortfall in affordable housing provision.

### Methodology

- 7.1 I have analysed the Council's latest published Five-Year Housing Land Supply trajectory which is contained in the Annual Position Statement ('APS') published in October 2024 (CD5.002).
- 7.2 The Council anticipates that it has a total supply of 8,999 dwellings over the five-year period from 1 April 2024 to 31 March 2029 from the following sources of supply (CD5.003):
- Appendix A: Major sites with planning permission
  - Appendix B: Sites allocated within Local Plans
  - Appendix C: Sites allocated within neighbourhood plans
  - Appendix D: Specific large sites
  - Appendix E: Minor sites with planning permission
  - Appendix F: Minor sites windfall allowance
  - Appendix G: Rural exceptions sites
- 7.3 For the purpose of this evidence, future affordable housing delivery has been calculated using sites included in the supply which are permitted for 6 dwellings and above in line with Policy 8 as they are considered to qualify for onsite affordable housing contributions.
- 7.4 I have not assumed any affordable housing delivery from the windfall allowance, since this is likely to comprise mostly smaller sites that will not qualify for affordable housing contributions.
- 7.5 As larger sites often deliver housing across several phases and over an extended timeframe, a 'pro-rata' estimate of affordable housing contributions for the five-year period has been applied.

### Council Position

- 7.6 I have reviewed each of the sites that qualify for affordable housing contributions in Appendices A to E and G of the Council's APS. A detailed breakdown of my site by site review can be found in **Appendix AG7**.



- 7.7 My analysis reveals that, based upon the Council's estimates of delivery from sites within its trajectory, there is a likely pipeline supply of 2,168 **gross** affordable homes over the next five years, equivalent to an average of just 434<sup>9</sup> affordable dwellings per annum.
- 7.8 It is noteworthy that there is only one site within the supply providing affordable housing in Marnhull Civil Parish (P/RES/2022/05524). This development is expected to deliver a total of 25 gross affordable homes over the period, averaging five per year.
- 7.9 When this is viewed in context of the 173 average bids for the three social housing properties let in the Parish in 2023/24 it is evident there is a pressing need for more affordable homes in the Parish as well as Dorset more widely.
- 7.10 Figure 7.1 calculates the potential shortfall over the next five years across Dorset, assuming an average of 434 gross affordable dwellings per annum will be delivered in this period. It shows that the existing shortfall of 4,374 dwellings will increase 147% to 10,789 dwellings by the end of the 2028/29 monitoring period.

*Figure 7.1: Additions (Actual and Projected) Compared to Needs Identified in 2021 LHNA for the Dorset Council area, 2021/22 to 2028/29*

Monitoring period	Actual (Net)	Projected (Gross)	2021 LHNA Net Need	Shortfall	Cumulative Shortfall
2021/22	181		1,717	-1,536	-1,536
2022/23	286		1,717	-1,431	-2,967
2023/24	310		1,717	-1,407	-4,374
2024/25		434	1,717	-1,283	-5,657
2025/26		434	1,717	-1,283	-6,940
2026/27		434	1,717	-1,283	-8,223
2027/28		434	1,717	-1,283	-9,506
2028/29		434	1,717	-1,283	-10,789
<b>Total</b>	<b>2,947</b>		<b>13,736</b>	<b>-10,789</b>	
<b>Avg. Pa</b>	<b>368</b>		<b>1,717</b>	<b>-1,349</b>	

Source: MHCLG Open Data; 2021 LHNA; and APS (October 2024).

- 7.11 The Council's 5YHLS future supply figure derived from the analysis falls substantially short of the 2,592 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and substantially short of the 1,717 net affordable housing needs per annum identified in the 2021 LHNA.

## Summary and Conclusions

- 7.12 The evidence set out in this section clearly demonstrates that the Council has failed to meet its affordable housing needs in recent years and will continue to do so in the future. The latest Five-Year Housing Land Supply trajectory indicates that only 434 gross affordable homes per annum are expected to be delivered over the next five years, far

<sup>9</sup> 2,168 / 5 years = 434.6

below the 1,717 affordable homes per annum identified as required in the 2021 LHNA, and even further below the 2,592 per annum required under the Sedgefield approach.

- 7.13 As a result, the existing shortfall of 4,374 dwellings will increase by 147% to 10,789 dwellings by the end of the 2028/29 monitoring period. This widening gap between need and delivery directly contradicts paragraph 8b of the NPPF, which seeks to ensure that sustainable development meets the housing needs of present and future generations. The lack of affordable housing delivery also undermines the objective of creating strong, vibrant, and healthy communities.
- 7.14 In Marnhull Civil Parish, the supply situation is even more acute, with only 25 affordable homes projected over five years, an average of just five per annum. When compared to the 173 average bids per social housing property let in 2023/24, it is evident that local demand vastly exceeds supply, reinforcing the urgent need for additional affordable housing provision.

## 8. Justification and Associated Benefits

### Introduction

- 8.1 Pursuant to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, when determining planning applications (and appeals) decision makers should first have regard to the relevant Development Plan as a whole, and then to any other material considerations.
- 8.2 Affordable housing serves a dual role in the planning process. It is both a Development Plan policy requirement and a material consideration. As a material consideration, the provision of affordable housing addresses wider societal needs, including housing affordability and social inclusion, thereby carrying weight in the planning balance.
- 8.3 In evaluating planning benefits (such as the provision of affordable housing) of a proposal, it is essential to recognise that compliance with policy, whether meeting or exceeding expectations, does not reduce a benefit's weight in the planning balance. Rather, the value of each benefit must be gauged on its own merits, considering the specific policy context and broader implications of the development.
- 8.4 As underscored in the *Vistry Homes Limited and Fairfax Acquisitions Limited v Secretary of State for Levelling Up, Housing and Communities and Others* [2024] EWHC 2088 (Admin) High Court Judgement (**CD13.001**) ('the Vistry Judgment'), the fact that a benefit aligns with policy requirements does not make it less significant; it should still contribute meaningfully to the overall planning balance. The judgment is clear at paragraph 154 that:
- "Whether a measure should be treated as a benefit, depends upon inter alia its nature and purpose, including whether it would help to meet a need which is, or is not, related to the development proposed."*
- 8.5 With particular regard to the weighting of the benefit of providing affordable housing, paragraph 157 emphasizes that:
- "I turn to consider questions of weight. If a decision-maker were to reduce the weight which he would otherwise give to a 40% provision of affordable housing because the development will provide the level of housing required by the development plan, that would also be objectionable, certainly in the absence of any logical explanation. The decision-maker should be assessing how the developer's contribution of affordable housing stands in relation to inter alia the justification in the development plan for the level of affordable housing required by the policy. Key considerations could include the level and nature of the need for affordable housing in the district and any shortfall in delivery."* (emphasis added).
- 8.6 As such the judgment affirms that affordable housing delivery should not be viewed merely as a baseline expectation for compliance with planning policy but as a meaningful benefit that carries weight in decision-making. It is incumbent upon the decision-maker to evaluate the extent to which the affordable housing provision responds to specific

needs of an authority, particularly in the context of any existing deficiencies in meeting these needs and/or shortfalls in delivery when ascribing weight in the planning balance.

### **Justification and Associated Benefits**

- 8.7 There is a significant shortfall in affordable housing provision in Dorset. There is currently no adopted Local Plan for the Dorset Unitary Authority, further exacerbating the challenges in securing sufficient affordable housing delivery. Policy 8 of the LPP1 for the former North Dorset Council area requires affordable housing provision from qualifying developments, yet persistent under delivery has resulted in an acute and worsening crisis. The appeal proposals fully meet policy requirements, providing up to 48 affordable dwellings (40%), making a meaningful contribution to addressing the chronic housing need.
- 8.8 The severity of the housing crisis is well-documented in formal assessments. The 2012 SHMA identified an affordable housing need of 387 net affordable dwellings per annum across the former North Dorset Council area. The 2021 LHNA identifies a net need for 1,717 affordable dwellings per annum across Dorset as a whole, yet the Council's current delivery rate falls significantly below this figure. Given the lack of progress on a Dorset-wide Local Plan, there remains significant uncertainty over how the growing need for affordable housing will be effectively addressed in the coming years.
- 8.9 Dorset Council has persistently failed to meet its affordable housing needs. Over the last three years alone, a cumulative shortfall of 4,374 affordable homes has accrued against the needs identified in the 2021 LHNA. To address this backlog, the Council would need to deliver 2,592 affordable dwellings per annum over the next five years, a 51% increase from the current identified need. Yet, despite this, the Council projects a delivery of only 434 affordable homes per annum over the next five years, just one-quarter of the identified need.
- 8.10 Additional real-world indicators reinforce the scale of the problem, with 5,406 households on the Housing Register as of March 2024, reflecting a 22% increase in a single year. Temporary accommodation figures further highlight the severity of the issue, with 261 households on 31 March 2024, 46% of whom have dependent children. The number of households accepted for Homeless Prevention Duty remains significant, with 762 cases recorded in 2023/24, of which 37% were due to the end of private rented tenancies.
- 8.11 The affordability crisis extends across both the rental and homeownership sectors. Lower quartile rents have risen 23% since 2013/14, consistently exceeding regional and national averages, while lower quartile house prices have increased by 51% since 2011, far outpacing wage growth. Affordability ratios remain significantly higher than both regional and national benchmarks, making homeownership unattainable for many. A lower quartile affordability ratio of 10.34 is 132% above the standard mortgage lending of 4.5 times income, highlighting the significant affordability gap.
- 8.12 In this context it is important to acknowledge 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<sup>10</sup> as follows:

- A lack of financial security and stability;
- Poor impacts on physical and mental health;
- Decreased social mobility;
- Negative impacts on children's education and development;
- Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour, or those with substance abuse issues;
- Being housed outside social support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increasing national housing benefit bill.

8.13 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need now. 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.

8.14 The appeal proposal provides 48 much-needed affordable homes, which will help alleviate the growing pressure on the affordable housing sector in Dorset. This development will contribute towards reducing the current backlog of unmet need and support those who are unable to access market housing. Given the scale of the shortfall and the clear national policy direction to increase affordable housing, this contribution must be given very substantial weight in the planning balance.

### **Summary**

8.15 Affordable housing serves as both a policy requirement and a significant material consideration due to its broader societal benefits, including housing affordability and social inclusion.

8.16 Compliance with Development Plan policy does not diminish the weight of affordable housing as a planning benefit; rather, it should be assessed based on the extent to which it meets local needs. Decision-makers must evaluate the shortfall in affordable housing and the scale of local demand when determining the weight of such benefits in the planning balance.

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<sup>10</sup> Sources for this evidence include a diverse range of reports from the Children's Commissioner, Shelter, the House of Commons Library, and the National Housing Federation. While the content of these reports is not reproduced word for word in this evidence for reasons of proportionality, copies can be made available as Core Documents upon request.

- 8.17 Dorset faces a severe and worsening affordable housing crisis, exacerbated by the absence of a Dorset wide adopted Local Plan and persistent under delivery of affordable homes. The provision of 48 affordable dwellings, amounting to 40% of the development, directly contributes to addressing this shortfall. With a current backlog of 4,374 affordable homes, a Housing Register increase of 22% in a year, and worsening affordability indicators, the need for affordable housing in Dorset is critical.
- 8.18 The failure to meet these needs has significant social consequences, including financial instability, negative health impacts, and decreased social mobility. Given the scale of the crisis and national policy priorities, the proposal's contribution to affordable housing are significant factors to be considered in the overall planning balance.

## 9. Summary

### Introduction

- 9.1 There is extensive evidence highlighting the severity of the national housing crisis in the UK, which leaves millions of people unable to secure adequate accommodation that meets their needs. It is evident that a significant increase in housing delivery, particularly affordable housing, is crucial to addressing the housing crisis.
- 9.2 The NPPF is clear that in order to meet the social dimension of sustainable development it is imperative to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations (paragraph 8b). In this respect it is important also acknowledge the Government's objective of significantly boosting the supply of homes (paragraph 61).
- 9.3 This evidence has demonstrated that the housing crisis is particularly acute in Dorset, where the delivery of affordable housing has persistently fallen short of identified needs. Market signals indicate a worsening trend in affordability across Dorset and, by any measure of affordability, the Council is amid an affordable housing emergency. Urgent action must be taken to deliver more affordable homes.

### Affordable Housing Offer

- 9.4 The appeal proposes up to 120 dwellings, comprising 40% affordable housing (up to 48 dwellings), secured through a Section 106 Agreement. The proposed tenure mix includes 52% Affordable Rented units (up to 25 homes), 23% Shared Ownership units (up to 11 homes) and 25% First Homes (up to 12 homes), delivering a balanced and sustainable community. This provision meets the expectations of Policy 8 of LPP1 and the NPPF.

### Policy Justification and Material Considerations

- 9.5 Policy 8 of the North Dorset Local Plan Part 1 (LPP1) establishes a requirement for 40% affordable housing provision on qualifying sites, reflecting the pressing need for affordable homes in the area. The Vistry Judgment confirms that the weight attributed to affordable housing should not be reduced simply because it aligns with policy requirements; instead, its significance should be assessed in the context of local need and delivery shortfalls.
- 9.6 The acute shortage of affordable housing in Dorset is well-documented, with a persistent and growing shortfall, exacerbated by the absence of an adopted Local Plan. The 2021 LHNA identifies a need for 1,717 net affordable dwellings per annum across Dorset, yet only 259 affordable homes per annum have been delivered on average since 2021/22, meeting just 15% of the identified need. This chronic under-delivery has resulted in a cumulative shortfall of 4,374 affordable homes in just three years, with projections indicating that this deficit could reach 10,789 by 2028/29 if current trends continue.
- 9.7 The consequences of this housing crisis are severe, with over 5,400 households on the Housing Register, high homelessness rates, and reliance on costly temporary accommodation. The appeal proposal will deliver 48 much-needed affordable homes,

directly contributing to addressing this crisis. Given the scale of need and the Council's failure to meet this need, the provision of affordable housing should be afforded substantial weight in the planning balance.

### **Planning Benefits**

- 9.8 The proposed development directly addresses these critical housing needs by delivering a balanced mix affordable homes that supports a range of incomes. It aligns with national planning policy objectives, which emphasizes meeting housing needs in full and delivering a variety of affordable housing options.
- 9.9 The proposed development offers an exceptional opportunity to deliver urgently needed affordable housing in Dorset. By addressing both current and future housing needs, it aligns with local and national policy objectives, representing a sustainable and positive contribution to Dorset's housing market.
- 9.10 Given the scale of the crisis and national policy priorities, the proposal's contribution to affordable housing are significant factors to be considered in the overall planning balance.



# Appendix AG1: Freedom of Information Response

## Housing Register

1. The average waiting times for households to be housed between 1 April 2023 and 31 March 2024 for the following types of affordable property:

Type of affordable property	Average Waiting Times (2023/24)
1-bed affordable property	275 days
2-bed affordable property	241 days
3-bed affordable property	376 days
4+ bed affordable property	544 days

2. The total number of households on the Housing Register on 31 March 2024 specifying the following locations as a preferred choice:

*\*There were 62 applications listing Marnhull as a preferred area on 4 April 2024. It is not possible to look back at the stats for a precise date. The closest date available is for 4<sup>th</sup> April 2024.*

Location	Household Preferences (31 March 2024)
Marnhull Civil Parish	*62

3. The number of properties advertised and the average number of bids per property between 1 April 2023 and 31 March 2024 in the following locations:

Type of affordable property	Marnhull Civil Parish	
	Number of properties advertised	Average Bids per Property
1-bed affordable property	Nil	N/A
2-bed affordable property	Nil	N/A
3-bed affordable property	1	109
4+ bed affordable property	2	64
Totals		

4. Any changes made to the Housing Register Allocations Policy since 2011, including:

- Dates each new/ amended Allocations Policy was published;

- Dates each new/ amended Allocations Policy was implemented;
- Description of the changes in each new/ amended Allocations Policy; and
- Copies of each new/ amended Allocations Policy published.
- 

**Data not available for changes to the policy before 01/04/2021 due to being sovereign authorities at that time and historical changes are unknown.**

**The current policy was implemented on 01/04/2021 and updated in 2024 to reword the Ukraine response under the exemptions and to reword our reviewing officer details**

**Current Policy: Dorset Council Housing Allocations Policy 2021 to 2026. Revised August 2024 - Dorset Council**

### **Temporary Accommodation**

5. The number of households housed in temporary accommodation by the Council within and outside the Local Authority area on the following dates:

Temporary Accommodation Location	31 March 2023	31 March 2024
Households Housed within the Local Authority area	338	265
Households Housed outside the Local Authority area	7	1
<b>Total Households</b>		

6. The number of households housed in temporary accommodation within the Local Authority area by other Council's on the following dates:

Date	Total Households
31 March 2023	0
31 March 2024	0

### **Housing Completions**

7. The number of **NET<sup>1</sup>** housing completions<sup>2</sup> in the former North Dorset Council area that were part M4 (2) compliant over the following monitoring years (1 April to 31 March):  
**This information is not recorded.**

<sup>1</sup> Net refers to total (gross) completions minus any losses to stock through demolitions.

<sup>2</sup> A housing completion refers to a newly constructed or converted dwelling that is ready for occupation.

Monitoring Year	Housing Completions (Net)	Affordable Housing Completions (Net)
2011/12		
2012/13		
2013/14		
2014/15		
2015/16		
2016/17		
2017/18		
2018/19		
2019/20		
2020/21		
2021/22		
2022/23		
2023/24		
<b>Totals</b>		

8. The number of NET<sup>3</sup> housing completions<sup>4</sup> in the Dorset Council area that were part M4 (2) compliant over the following monitoring years (1 April to 31 March):  
**This information is not recorded.**

Monitoring Year	Housing Completions (Net)	Affordable Housing Completions (Net)
2019/20		
2020/21		
2021/22		
2022/23		
2023/24		
<b>Totals</b>		

<sup>3</sup> Net refers to total (gross) completions minus any losses to stock through demolitions.

<sup>4</sup> A housing completion refers to a newly constructed or converted dwelling that is ready for occupation.

9. The number of NET<sup>5</sup> housing completions<sup>6</sup> and affordable housing<sup>7</sup> completions in Marnhull Civil Parish over the following monitoring years (1 April to 31 March):

Monitoring Year	Housing Completions (Net)	Affordable Housing Completions (Net)
2011/12	1	
2012/13	3	
2013/14	6	
2014/15	1	
2015/16	2	
2016/17	1	
2017/18	9	
2018/19	15	3
2019/20	9	5
2020/21	8	
2021/22	1	
2022/23	11	
2023/24	8	
<b>Totals</b>		

<sup>5</sup> Net refers to total (gross) completions minus any losses to stock through demolitions.

<sup>6</sup> A housing completion refers to a newly constructed or converted dwelling that is ready for occupation.

<sup>7</sup> As defined by Annex 2 of the National Planning Policy Framework (2024) which can be viewed [here](#).

## Appendix AG2: Core Documents List

### CD3 Development Plan

Ref.	Document
CD3.001	North Dorset Local Plan (2016)

### CD4 Inquiry Documents (includes Wheatcroft plans etc) (to include topic papers)

Ref.	Document
CD4.019	Agreed SoCG (Feb 2025)

### CD5 Other Relevant Documents

Ref.	Document
CD5.002	Dorset Annual Position Statement October 2024- Main Report
CD5.003	Dorset Annual Position Statement October 2024- Appendices A to G- site tables
CD5.004	Dorset Annual Position Statement October 2024- Appendix H- housing delivery test calculations
CD5.005	Dorset Council Housing Strategy 2024 to 2029
CD5.006	Dorset Council Homelessness and Rough Sleeping Strategy 2021 to 2026
CD5.007	Bournemouth/Poole Strategic Housing Market Assessment Update (January 2012)
CD5.008	Dorset and Bournemouth, Christchurch, and Poole Local Housing Needs Assessment (November 2021)

### CD6 Reg 14 Marnhull Neighbourhood Plan

Ref.	Document
CD6.001	Marnhull Neighbourhood Plan Regulation 14 Consultation Draft (February 2025)

**CD7 Emerging Dorset Local Plan**

Ref.	Document
<b>CD7.001</b>	Local Development Scheme (LDS) March 2025

**CD8 Consultee Responses on Planning application**

Ref.	Document
<b>CD8.001</b>	Housing Consultation Response (08 2023)

**CD11 Proofs of Evidence- Appellant**

Ref.	Document
<b>CD11.001</b>	Planning Evidence of Clare Spiller (Chapman Lilly Planning)
<b>CD11.002</b>	Five-Year Housing Land Supply Statement of Jeff Richards (Turley)
<b>CD11.003</b>	Affordable Housing Statement of Annie Gingell (Turley)

**CD13 Case Law and Appeals**

Ref.	Document
<b>CD13.001</b>	Vistry Homes Limited and Fairfax Acquisitions Limited v Secretary of State for Levelling Up, Housing and Communities and Others [2024] EWHC 2088 (Admin) High Court Judgement (August 2024)

## Appendix AG3: Relevant NPPG Extracts

Section	Paragraph	Relevant Extracts
Housing and Economic Needs Assessment <b>What is housing need?</b>	Paragraph: 001 Reference ID: 2a-001-20241212 Revision date: 12 12 2024	<i>“Housing need is an unconstrained assessment of the minimum number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”</i>
Housing and Economic Needs Assessment <b>Why is an affordability adjustment applied?</b>	Paragraph: 006 Reference ID: 2a-006-20241212 Revision date: 12 12 2024	<p><i>“An affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need because:</i></p> <ul style="list-style-type: none"> <li><i>• housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed</i></li> <li><i>• people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.</i></li> </ul> <p><i>The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”</i></p>
Housing and Economic Needs Assessment <b>What types of households are considered to be in affordable housing need?</b>	Paragraph: 018 Reference ID: 2a-018-20190220 Revision date: 20 02 2019	<i>“All households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing for planning purposes is set out in Annex 2 of the National Planning Policy Framework.”</i>
Housing and Economic Needs Assessment <b>How can affordable housing need be calculated?</b>	Paragraph: 019 Reference ID: 2a-019-20190220 Revision date: 20 02 2019	<i>“Strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority</i>

		<i>(e.g. housing, health and social care departments)."</i>
Housing and Economic Needs Assessment <b>How can the current unmet gross need for affordable housing be calculated?</b>	Paragraph: 020 Reference ID: 2a-020-20190220 Revision date: 20 02 2019	<p><i>"Strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:</i></p> <ul style="list-style-type: none"> <li><i>• the number of homeless households;</i></li> <li><i>• the number of those in priority need who are currently housed in temporary accommodation;</i></li> <li><i>• the number of households in over-crowded housing;</i></li> <li><i>• the number of concealed households;</i></li> <li><i>• the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i></li> <li><i>• the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."</i></li> </ul>
Housing and Economic Needs Assessment <b>How can the number of newly arising households likely to be in affordable housing need be calculated (gross annual estimate)?</b>	Paragraph: 021 Reference ID: 2a-021-20190220 Revision date: 20 02 2019	<p><i>"Projections of affordable housing need will have to reflect new household formation, the proportion of newly forming households unable to buy or rent in the market area, and an estimate of the number of existing households falling into need. This process will need to identify the minimum household income required to access lower quartile (entry level) market housing (strategic policy-making authorities can use current costs in this process, but may wish to factor in anticipated changes in house prices and wages). It can then assess what proportion of newly-forming households will be unable to access market housing."</i></p>
Housing and Economic Needs Assessment <b>How can the current total affordable housing supply available be calculated?</b>	Paragraph: 022 Reference ID: 2a-022-20190220 Revision date: 13 09 2018	<p><i>"Assessing the total affordable housing supply requires identifying:</i></p> <ul style="list-style-type: none"> <li><i>• the number of affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households in need;</i></li> <li><i>• suitable surplus stock (vacant properties); and</i></li> <li><i>• the committed supply of new net affordable homes at the point of the assessment (number and size).</i></li> </ul>



		<p><i>Sources of data: Ministry of Housing, Communities and Local Government affordable housing supply statistics to show recent trends, and local authority and Registered Social Landlord records including housing register, transfer lists, demolition and conversion programmes, development programme of affordable housing providers.</i></p> <p><i>Total affordable housing stock available = Dwellings currently occupied by households in need + surplus stock + committed additional housing stock – units to be taken out of management”</i></p>
<p>Housing and Economic Needs Assessment</p> <p><b>How is the total annual need for affordable housing calculated?</b></p>	<p>Paragraph: 024</p> <p>Reference ID: 2a-024-20190220</p> <p>Revision date: 20 02 2019</p>	<p><i>“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.</i></p> <p><i>The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”</i></p>
<p>Housing Supply and Delivery</p> <p><b>How can past shortfalls in housing completions against planned requirements be addressed?</b></p>	<p>Paragraph: 031</p> <p>Reference ID: 68-031-20190722</p> <p>Revision date: 22 July 2019</p>	<p><i>“Under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing.”</i></p> <p><i>“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied”</i></p>

## **Appendix AG4: State of Dorset Housing 2024**

Contained overleaf.

December  
2024

# State of Dorset Housing



Decent homes can result in a better quality of life. Good housing can improve health and financial well-being, helping residents feel safe and secure. It helps to support thriving communities and access to a safe and suitable home provides children with the best start in life.

Housing plays a key role in economic growth and employment opportunities for individuals and businesses.

## Big Numbers Box

**70.4%**

of Dorset homes are owner-occupied.

**£350,000** Average house price

**16.3%**

Private rent

**23,414**

Units of social housing

Shared Ownership 1%

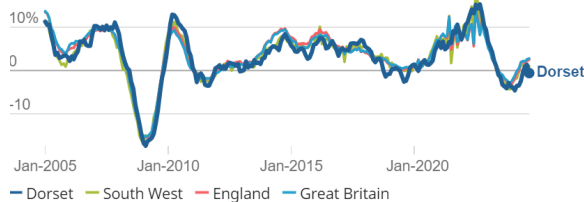
**12.3%**

Social Housing

## Box 1: Housing Costs

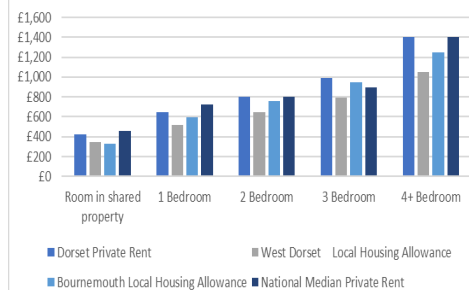
### Annual change in house prices in Dorset

House price annual inflation, Dorset, January 2005 to September 2024



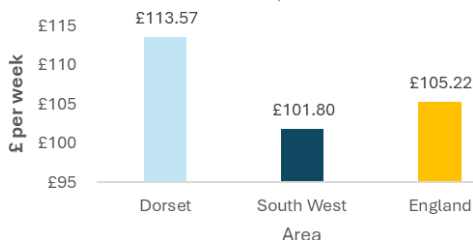
Source: UK House Price Index from Office for National Statistics and HM Land Registry

### Median Private Rents -v- Local Housing Allowance

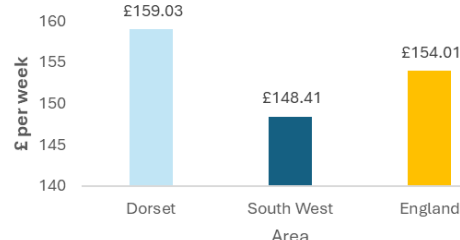


In the last twenty years, annual house prices have, in general, been on the rise, apart from a significant drop during the economic crash of 2008 and recent economic uncertainty. Dorset prices are higher than both the national and regional prices. Whilst median private rental costs are on par with the national rents, the gap between local housing allowance and rents has widened. Local Housing Allowance is used to calculate the maximum amount people renting from a private landlord can claim in Housing Benefit or Universal Credit. Local Housing Allowance was capped in 2016 but is due to increase in 2024.

### Average weekly net rent (£ per week) for Dorset, South West and England - Large PRPs (General needs)



### Affordable Rent general needs Average weekly gross rent (£ per week) and units for Dorset, South West and England - LARPs & all PRPs



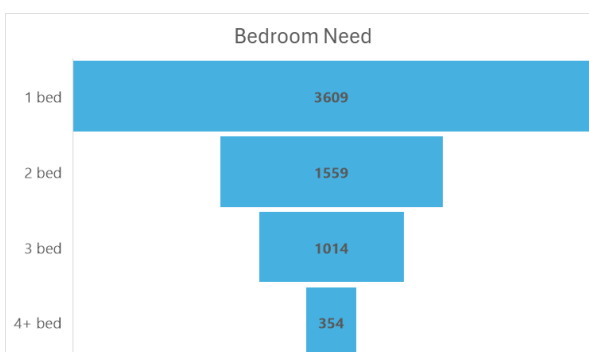
The figures above show the average cost to rent a housing association property at either a social rent or an affordable rent. Affordable rents are calculated based on 80% of the market rent in our area. As market rent increases, so does the affordable rent cost.

## Box 2: Housing Needs

Housing Register	2024
Band A Emergency Need	333
Band B High Need	984
Band C Medium Need	1,620
Band D Low Need	3,599

As at 31st October 2024 6,536 households were registered for housing through Homechoice Dorset, the register for those people seeking a move to social housing.

Bedroom Needs data



Across Dorset, 77.9% of homes are under-occupied by one or more bedrooms. With 64.2% of Dorset homes having 3 or more bedrooms.

The census says that 3,496 households with dependant children live in overcrowded conditions. 970 of these have applied to join the waiting list for social housing.

Whilst the biggest need is for smaller properties, families needing larger homes often wait longer to move. This is because larger homes rarely become available. During the 12 months to March 2023, 20 properties with 4 or more bedrooms were let through Homechoice Dorset.

The top heavy shape of the housing need for those who have applied to the housing register is reflected in the homeless approaches made to the Council.

Over half of emergency homeless households have a one bedroom need.

Approximately a quarter are waiting for a two bedroom property.

## Box 3: Homelessness Demand

There was a 3.5% increase in homeless approaches in the year to March 2023.

The service receives:

- Average 583 calls per month. Each call lasting up to 30 minutes.
- Average of 2,250 emails each month
- More than 4,200 contacts from the online portal
- Initial enquiries resulted in 2,394 homeless assessments

### Main reasons given for homelessness

Evicted by family
End of private rented accommodation
Relationship breakdown
Victim of domestic abuse
Friends no longer willing to accommodate
Loss of social housing
Home no longer suitable

## Sources

The following datasets have been used throughout the bulletin:  
 Regulator of Social Housing—RP Social Housing by Local Authority Area 2023-2024  
 Huume Housing Register Data  
 Office for National Statistics Housing Data

## Appendix AG5:Data Tables

### Former North Dorset Council

Table 1: Gross Additions to Affordable Housing Stock in the former North Dorset Council area, 2011/12 to 2018/19

Monitoring Period	Total Housing Completions (net)	Gross Additions	Gross additions as a %age of total completions
2011/12	377	144	38%
2012/13	146	57	39%
2013/14	228	103	45%
2014/15	181	81	45%
2015/16	222	44	20%
2016/17	144	52	36%
2017/18	161	9	6%
2018/19	225	3	1%
<b>Totals</b>	<b>1,684</b>	<b>493</b>	<b>29.3%</b>
<b>Avg. Pa.</b>	<b>211</b>	<b>62</b>	<b>29.3%</b>

Source: MHCLG Open Data

Table 2: Net Additions to Affordable Housing Stock in the former North Dorset Council area, 2011/12 to 2018/19 (detailed)

Monitoring Year	Total Housing Completions (net)	Gross Additions	LPA Right to Buy Sales	RP Right to Buy Sales	Net Additions	Net additions as a %age of total completions
2011/12	377	144		0	144	38%
2012/13	146	57		13	44	30%
2013/14	228	103		13	90	39%
2014/15	181	81		9	72	40%
2015/16	222	44		2	42	19%
2016/17	144	52		2	50	35%
2017/18	161	9		2	7	4%
2018/19	225	3		1	2	1%
<b>Total</b>	<b>1,684</b>	<b>493</b>	<b>0</b>	<b>42</b>	<b>451</b>	<b>27%</b>
<b>Avg. Pa.</b>	<b>211</b>	<b>62</b>	<b>0</b>	<b>5</b>	<b>56</b>	<b>27%</b>

Source: MHCLG Open Data

Table 3: Net Additions to Affordable Housing Stock in the former North Dorset Council area, 2011/12 to 2018/19 (summary)

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2011/12	144	0	144
2012/13	57	13	44
2013/14	103	13	90
2014/15	81	9	72
2015/16	44	2	42
2016/17	52	2	50
2017/18	9	2	7
2018/19	3	1	2
<b>Totals</b>	<b>493</b>	<b>42</b>	<b>451</b>
<b>Avg. Pa.</b>	<b>62</b>	<b>5</b>	<b>56</b>

Source: MHCLG Open Data

Table 4: Net Additions Compared to Needs Identified in the 2012 SHMA for the former North Dorset Council area, 2011/12 to 2015/16

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2011/12	144	387	-243	-243	37%
2012/13	44	387	-343	-586	11%
2013/14	90	387	-297	-883	23%
2014/15	72	387	-315	-1,198	19%
2015/16	42	387	-345	-1,543	11%
Total	392	1,935	-1,543		20%
Avg. Pa	78	387	-309		

Source: MHCLG Open Data; and 2012 SHMA

Table 5: Net Additions Compared to Needs Identified in the 2015 SHMA for the former North Dorset Council area, 2013/14 to 2018/19

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2013/14	90	146	-56	-56	62%
2014/15	72	146	-74	-130	49%
2015/16	42	146	-104	-234	29%
2016/17	50	146	-96	-330	34%
2017/18	7	146	-139	-469	5%
2018/19	2	146	-144	-613	1%
Total	263	876	-613		30%
Avg. Pa	44	146	-102		

Source: MHCLG Open Data; and 2015 SHMA

## Dorset Unitary Authority

Table 6: Gross Additions to Affordable Housing Stock in the Dorset UA Council area, 2019/20 to 2023/24

Monitoring Period	Total Housing Completions (net)	Gross Additions	Gross additions as a %age of total completions
2019/20	1,432	206	14%
2020/21	1,388	167	12%
2021/22	1,818	196	11%
2022/23	1,687	296	18%
2023/24	1,480	313	21%
<b>Totals</b>	<b>7,804</b>	<b>1,178</b>	<b>15.1%</b>
<b>Avg. Pa.</b>	<b>1,561</b>	<b>236</b>	<b>15.1%</b>

Source: MHCLG Open Data

Table 7: Net Additions to Affordable Housing Stock in the Dorset UA Council area, 2019/20 to 2023/24 (detailed)

Monitoring Year	Total Housing Completions (net)	Gross Additions	LPA Right to Buy Sales	RP Right to Buy Sales	Net Additions	Net additions as a %age of total completions
2019/20	1,432	206		17	189	13%
2020/21	1,388	167		11	156	11%
2021/22	1,818	196		15	181	10%
2022/23	1,687	296		10	286	17%
2023/24	1,480	313		3	310	21%
<b>Total</b>	<b>7,804</b>	<b>1,178</b>	<b>0</b>	<b>56</b>	<b>1,122</b>	<b>14%</b>
<b>Avg. Pa.</b>	<b>1,561</b>	<b>236</b>	<b>0</b>	<b>11</b>	<b>224</b>	<b>14%</b>

Source: MHCLG Open Data

Table 8: Net Additions to Affordable Housing Stock in the Dorset UA Council area, 2019/20 to 2023/24 (summary)

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2019/20	206	17	189
2020/21	167	11	156
2021/22	196	15	181
2022/23	296	10	286
2023/24	313	3	310
<b>Totals</b>	<b>1,178</b>	<b>56</b>	<b>1,122</b>
<b>Avg. Pa.</b>	<b>236</b>	<b>11</b>	<b>224</b>

Source: MHCLG Open Data

Table 9: Net Additions Compared to Needs Identified in 2021 LHNA for the Dorset UA Council area, 2021/22 to 2023/24

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	181	1,717	-1,536	-1,536	11%
2022/23	286	1,717	-1,431	-2,967	17%
2023/24	310	1,717	-1,407	-4,374	18%
Total	777	5,151	-4,374		15%
Avg. Pa	259	1,717	-1,458		

Source: MHCLG Open Data; and 2021 LHNA



## Appendix AG6: Relevant Decisions Summary

Summary table contained overleaf.

Appeal Ref.	Site Name	Decision Type	Decision	Decision Date	Affordable Housing Offer	Paragraph Ref.(s) / Text	Weight to Affordable Housing
A. APP/K3415/W/24/3340089 B. APP/Z3445/W/24/3340094	A. Land North of Browns Lane, Tamworth, Staffordshire B79 8UT B. Land North of Browns Lane, Tamworth, Staffordshire B79 8UT	Inspector	A. Allowed B. Allowed	04/10/2024	A. 210 homes (100% provision) B. 210 homes (100% provision)	<p>IR 69. It is common ground that The Housing and Economic Development Need Assessment – Update (HEDNA) identifies a net need for 220 new affordable rented homes per annum in LDC between 2016 and 2036, and a net need for 170 new affordable rented homes per annum in TBC between 2016 and 2036. Those assessed needs are across the whole of each administrative area.</p> <p>IR 70. Since the HEDNA, new affordable homes in LDC net of Right to Buy (RtB) have averaged 144 per year. This pace of delivery has resulted in a shortfall of -535 affordable homes since 2016/17 which is around -76 affordable homes per year below the identified need. In respect of TBC, new affordable homes net of RtB have averaged 25 per year. This has created a shortfall against the identified need of -1,017 affordable homes with an annual shortfall of -145 homes.</p> <p>IR 71. The parties agree that the shortfalls should be dealt with within the next five years. To do so in LDC, the Council need to deliver 327 net affordable homes each year between 2023/24 and 2027/28 (220 +(535/5)). Thereafter the need would reduce and revert to that identified by the HEDNA.</p> <p>IR 72. To address TBC's shortfall 373 net affordable homes are needed each year between 2023/24 and 2027/28 (170 + (1,017/5)). For the remaining period up to 2036, the annual need would be 170 affordable homes.</p> <p>IR 91. Collectively, for the above reasons, I give the proposed affordable housing provision on the appeal site very substantial positive weight. In reaching this view, I have taken the Council's case at its highest, i.e. the gross affordable housing supply for LDC and TBC.</p>	Very Substantial weight
B. APP/B1930/W/22/3312277	B. Land North Of Chiswell Green Lane, Chiswell Green, St. Albans	SoS	B. Allowed	22/03/2024	B. 330 homes (100% provision)	<p>SoS 29. For the reasons given in IR586-591, the Secretary of State agrees with the Inspector that in the context of such a great housing need, very substantial weight should be attached to the proposed housing.</p> <p>IR 193. Over the nine-year period between 2013/14 and 2021/22, there was a shortfall against that need of 5,053 affordable dwellings, equivalent to 561 per annum.</p> <p>IR 194. In the first two years of the 2020 LHNA period since 2020/21, there has been an additional shortfall of 1,428 affordable dwellings, equivalent to 714 per annum.</p> <p>IR 195. The agreed approach is that any shortfall in delivery should be dealt with in the next five years.</p> <p>IR 196. When the 1,428 dwelling affordable housing shortfall which has accumulated since 2020/21 is factored into the need of 828 affordable dwellings per annum for the period 2020 to 2036, the number of affordable homes that the Council needs to deliver in the 5-year period from 2022/23 to 2026/27 is 5,570, or 1,114 per annum.</p> <p>IR 197. The Council's current supply figure for the next five years is, however, just 39 affordable dwellings per annum.</p> <p>IR 198. That means there will be a shortfall of 1,075 affordable dwellings per annum, and a total shortfall of 5,375 affordable dwellings over the next five years.</p> <p>IR 199. These conclusions are absolutely irrefutable. In St Albans, the delivery of affordable housing has collapsed. Worse still, in refusing permission for the Appeal application, 330 affordable homes in one quick hit, the Council has given up on even attempting to address this affordable housing emergency.</p> <p>IR 591. In these respects, the scheme is unusual, but is facilitated by the appellant's desire to meet these particular needs by offering the land for free and discounting all properties by at least 33%, in excess of that required to qualify as affordable housing. Such a scheme is unquestionably a positive aspiration that would</p>	Very Substantial weight

go a long way towards boosting the Council's supply of affordable housing. In the context of such a great housing need, I attach very substantial weight to the proposed housing.

APP/C3620/W/ 23/3324631	Land at Sondes Place Farm, Westcott Road, Dorking RH4 3EF	Inspector	Allowed	28/11/2023	72 homes (50% provision)	<p>IR 85. Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need [26] points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.</p> <p>IR 86. To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to be substantially below that level of delivery. This will mean the existing shortfall will only become worse.</p> <p>IR 89. The proposal would deliver up to 72 affordable homes with a suitable tenure split, which exceeds the 40% on site provision that Core Strategy Policy CS 4 requires. The s106 agreement secures the provision and tenure split. 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.</p>	Very Substantial weight
APP/B3410/W/ 20/3245077	Land off Aviation Lane, Burton-upon-Trent	Inspector	Allowed	07/10/2022	128 homes (100% provision)	<p>IR 8. The appellant suggests that the Council should recoup the existing shortfall over the next five years, in line with the approach set out in the Planning Practice Guidance (PPG) for overall housing shortfalls. [1] That would result in the need to secure delivery of some 164 dwellings per year over the next five years. The Council, on the other hand, considers that the total amount of required affordable housing, constituting some 1,484 dwellings, would be provided over the whole plan period (2012-2031). In my view, the extent of the shortfall and the number of households on the Council's Housing Register combine to demonstrate a significant pressing need for affordable housing now. As such, I consider that, the aim should be to meet the shortfall as soon as possible.</p> <p>IR 52. Planning law requires that applications be determined in accordance with the development plan, unless material considerations indicate otherwise. In this case I have found that the delivery of the site for 100% affordable housing would be a very significant benefit. Indeed, the SOCG sets out agreement that the weight to be afforded to the provision of affordable housing is at least significant. On a straightforward development plan balance, I am firmly of the view that the provision of the affordable housing proposed is a significant material consideration which, in this instance, outweighs the development plan conflict.</p>	Very Significant benefit
A. APP/B1930/W/ 20/3265925 B. APP/C1950/W/ 20/3265926	A. Roundhouse Farm, Land Off Bullens Green Lane, Colney Heath B. Roundhouse Farm, Land Off Bullens Green Lane, Colney Heath	Inspector	A. Allowed B. Allowed	14/05/2021	45 homes – split 50:50 between SADC and WHBC (45% provision)	<p>IR 53. 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.</p> <p>IR 54. 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 SADC and WHBC, I attach very substantial weight to the delivery of up to 45 affordable homes in this location in favour of the proposals.</p>	Very Substantial weight

APP/Q3115/W/ 19/3230827	Oxford Brookes University, Wheatley Campus, College Close, Wheatley, Oxford OX33 1HX	SoS	Allowed	23/04/2020	173 homes (35% provision)	<p>SoS 35. While he has concluded that the council are able to demonstrate a 5 year supply of housing land, the Secretary of State agrees that, for the reasons given in IR13.97 to 13.102, the proposed development would contribute significantly towards the Council's affordable housing shortfall. Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, that the delivery of up to 500 houses, 173 of which would be affordable, are considerations that carry very substantial weight.</p> <p>IR 13.98 For South Oxfordshire, the SHMA identifies a need for 331 net affordable homes per annum to deal with the backlog using the Sedgefield approach for the period between 2013 and 2031. [8.87] In the 6-year period since this annual need figure was calculated in the SHMA, a shortfall of -713 affordable homes has accrued as a result of delivery falling substantially short of meeting identified needs. In order to address this backlog, the Council would need to deliver 2,370 net affordable homes over the course of the next 5 years.</p> <p>IR 13.111 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 irrespective of the fact that the Council can demonstrate a 3/5YHLS.</p>	Very Substantial weight
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## **Appendix AG7: Future Supply Analysis**

See standalone PDF.

**Turley Bristol Office**  
40 Queen Square  
Bristol  
BS1 4QP

T 0117 989 7000