

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

Land at Pear Tree Lane, Euxton, Chorley

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Outline application for the erection of up to 180 dwellings including 30% affordable housing, with public open space, structural planting and landscaping, surface water flood mitigation and attenuation and vehicular access points from School Lane

Land at Pear Tree Lane, Euxton, Chorley

Gladman Developments Limited

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Introduction

Section 1

- 1.1 My name is **James Stacey** and my credentials as an expert witness are summarised as follows: I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England (UWE) (1997). I am a member of the Royal Town Planning Institute. I have over 25 years' professional experience in the field of town planning and housing. I have been a Director of Tetlow King Planning Ltd for the past nine years.
- 1.2 The Proof of Evidence (PoE) examines the affordable housing need in the Chorley Council area and considers the weight to be attributed to affordable housing in the overall planning balance.
- 1.3 The appeal proposals seek permission for up to 180 dwellings, of which up to 30% (up to 54 dwellings) are to be provided as affordable housing. This fully accords with the requirements of Policy 7 of the Central Lancashire Core Strategy (2012).
- 1.4 In researching the evidence which underpins my evidence, I have placed reliance upon a Freedom of Information (FOI) received on 12 May 2020.
- 1.5 There is a clear and pressing need for more affordable homes to be delivered in Chorley Borough and within Euxton which the appeal proposals would make a very substantial contribution towards addressing.

Affordable Housing as an Important Material Consideration

Section 2

- 2.1 The importance of affordable housing as a material consideration has long been established, originating from PPG3 (1992).
- 2.2 It continues to play an important role in the National Planning Policy Framework (NPPF) which along with the Planning Practice Guidance (PPG) are material planning considerations.
- 2.3 The NPPF is important in setting out the role of affordable housing in the planning and decision making process. The key paragraphs of the NPPF include:
- A strong emphasis on the delivery of sustainable development. Fundamental to the social objective is to *“support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”* (paragraph 8).
 - A focus on delivering a sufficient supply of homes, in which paragraph 59 confirms the Government’s objective of *“significantly boosting the supply of homes”*.
 - The revised NPPF is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include *“those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes”* (paragraph 61).
- 2.4 This section of my main evidence clearly highlights that within national policy, providing affordable housing has long been established as, and remains, a key national priority as part of the drive to address the national housing crisis.

The National Housing Crisis

Section 3

- 3.1 There is incontrovertible evidence that there is a national housing crisis in the UK affecting many millions of people, who are unable to access suitable accommodation to meet their housing needs.
- 3.2 The housing crisis we face has been recognised both within the UK and internationally. This includes from figures at the highest levels of the Bank of England and internationally with the European Commission and the International Monetary Fund.
- 3.3 In my main PoE, I set out that there have been numerous speeches and announcements from Members of the Government in the last 3 years.
- 3.4 The Housing White Paper, Fixing our Broken Housing Market, was published on 7 February 2017. The foreword by the Prime Minister, Theresa May, indicates that, “*The Government is determined to build a stronger, fairer Britain where people who work hard are able to get on in life. That means breaking down barriers to progress by taking the big, difficult decisions that are right for Britain in the long term*”. The Prime Minister went on to say that, “*Our broken housing market is one of the biggest barriers to progress facing the country today.* (my emphasis).
- 3.5 Furthermore, the introduction to the White Paper is clear:
“The housing market in this country is broken, and the cause is very simple: for too long, we haven’t built enough homes”.
- 3.6 Speaking at the Local Government Association Conference in July 2017, the former Secretary of State for Housing Communities and Local Government, Mr Sajid Javid stated that “*there’s a serious shortage of decent, affordable housing in this country*”. He added “*since the 1970s – under Wilson, Callaghan, Thatcher, Major, Blair, Brown, Cameron and now May – we’ve supplied an average of 160,000 new homes each year. That’s far below what’s needed, and that failure of supply to keep up with demand has led to predictable results*”.
- 3.7 Mr Javid summarised the issue, by outlining that “*the simple fact is that to put this right we need to build more homes that people want to live in, in places people want to live*”.

- 3.8 The former Prime Minister, Theresa May, acknowledged in her Speech to the National Housing Federation Summit in September 2018 that the housing market is broken with the importance of more indistinguishable, high quality affordable homes being a crucial to resolving the housing crisis. The former Prime Minister set out that one of the Government's priorities is:
- “doing all we can to get more of the right homes built in the right places, so we can help more people onto the housing ladder – and ensure that those who cannot afford to own their own home also have a decent place to live”.*
- 3.9 More recently, a House of Commons Debate on a motion on the British House Building Industry in August 2019 resolved (Column 465, 4.59pm), *“That this House notes with concern the ongoing shortage of housing and the housing crisis across England; further notes with concern the number of families in temporary accommodation and the number of people rough sleeping; [and] acknowledges that there are over one million households on housing waiting lists...”*
- 3.10 It concluded that it *“calls on the Government to tackle the housing crisis as an urgent priority”* (my emphasis).
- 3.11 Further evidence of the importance and need for affordable housing was highlighted by the current Housing Minister, Esther McVey who stated at the RESI Convention in September 2019 that *“Since the mid-1990s, house prices have risen to 8 times, 10 times, 12 times, in some of the most expensive parts of this country 44 times the actual income of someone, that cannot be right.”*
- 3.12 As I have sought to demonstrate there is an ever-increasing wealth of evidence including from figures at the highest levels of Government that unaffordability and inability to get on the housing ladder is a significant problem.
- 3.13 What is also clear is that the messages from previous Governments have failed to ensure enough new homes, especially affordable homes, are being built.
- 3.14 The evidence is clear and, in my opinion, demonstrates the pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable.
- 3.15 Evidence suggests that failure to do so will present a risk to the future economic and social stability of the United Kingdom.

The Extent of the National Shortfall in Housing Delivery

Section 4

- 4.1 The extent of the need for housing and the scale of the crisis as a result of the persistent under-delivery of both market and affordable housing in the UK is explored in my main PoE.
- 4.2 Over the course of the past 15 years a series of industry-leading professionals and figures at the highest level of Government have identified that there is a need for between 200,000 to 340,000 homes per annum to address the housing crisis that has engulfed the country.
- 4.3 On a national level, in every scenario, against every annual need figure identified since the publication of the Barker Review in 2004, the extent of the shortfall in housing delivery in England is staggering and ranges from a shortfall of -1,100,091 to a shortfall of -2,540,091 over the past 15 years depending on which annual target actual housing completions are measured against.
- 4.4 When the Government's most recently published target of 300,000 home per annum taken from the MHCLG 2018 Single Departmental Plan is used for comparison, there has been a shortfall of -1,800,091 homes since 2014.
- 4.5 The extent of the shortfall in housing delivery in England is staggering and merely serves to further compound the acute affordability problems that the country is facing. What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is absolutely essential to arrest the housing crisis and prevent further worsening of the situation.

The Development Plan and Related Policies

Section 5

- 5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The Development Plan for Chorley currently comprises the Chorley Local Plan (2015), and the Central Lancashire Core Strategy (2012).
- 5.3 Other material considerations include the NPPF (2019), the Planning Practice Guidance (PPG), the Central Lancashire Affordable Housing Supplementary Planning Document (2012) and the emerging Local Plan Update.
- 5.4 The Chorley Local Plan was adopted in 2015 and covers the period between 2012 and 2026. It replaces the Chorley Borough Local Plan Review (2003).
- 5.5 Paragraph 5.2 highlights that Local authorities are required to plan for a mix of housing, informed by a Strategic Housing Market Assessment (SHMA). It goes on to cross reference the 2009 Central Lancashire Strategic Housing Market Assessment (SHMA) which estimated an annual shortfall of 723 affordable dwellings.
- 5.6 At paragraph 5.4 the Plan highlights that it does not include an affordable housing policy as Policy 7 of the Core Strategy deals with this issue
- 5.7 The Central Lancashire Core Strategy was adopted in 2012 and covers the combined areas of Preston, South Ribble and Chorley for the period between 2010 and 2026.
- 5.8 Paragraph 8.23 highlights that *“the percentage of owner-occupied properties is higher within Central Lancashire than the national average, increased also through the ‘Right to Buy’ initiative where many Council homes were transferred to private ownership.”*
- 5.9 **Policy 7** is concerned with affordable and special needs housing and requires 30% in the urban parts and 35% in rural areas. The site threshold is 15 dwellings or 0.5 ha in the urban parts and 5 dwellings or 0.15 ha in the rural areas.
- 5.10 Appendix D to the Core Strategy sets the ‘Performance Monitoring Framework’ for the Plan period. Monitoring indicator 5 is concerned with Policy 7 (affordable housing) and sets a target of 50 affordable housing completions annually in Chorley over the Plan

period. It goes on to note the trigger for review will be the “*shortfall of new affordable housing completions of more than 20% on a rolling three-year average*”. It is uncertain why such a low figure of just 50 dwellings was chosen to review the delivery of affordable housing, as this is not reflective of any of the annual needs identified in the various housing assessments.

- 5.11 The emerging Central Lancashire Local Plan will cover the period 2021 to 2036 upon its adoption. An Issues and Options consultation was undertaken between November 2019 and February 2020. The consultation document does not seek any views on the wording of future policy or future level of needs.
- 5.12 Central Lancashire Affordable Housing Supplementary Planning Document (2012) was adopted in October 2012 and is intended to provide advice on how the Council’s affordable housing policy is to be implemented.
- 5.13 Paragraph 14 details that the 2009 SHMA indicated that Chorley had an estimated annual shortfall of 723 affordable homes, the highest in the HMA.
- 5.14 There are a number of Corporate Documents and strategies, which assist in the understanding of the Council’s objectives for dealing with housing need, including the Chorley Sustainable Community Strategy 2010-2020, the Chorley Corporate Strategy 2019/20-2021/22, and the Chorley Housing Strategy 2019-2024.
- 5.15 The evidence set out in this section clearly highlights that within adopted policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority for Chorley Council.
- 5.16 Given the recognised shortfall in affordable housing across Chorley, the appeal proposals provide an affordable housing contribution which would contribute significantly towards addressing this key corporate priority.

Affordable Housing Needs in Chorley Borough

Section 6

- 6.1 The Central Lancashire Strategic Housing Market Assessment (SHMA), used to inform the Core Strategy, was published in 2009. The SHMA covered the period between 2009 and 2014 with the Housing Market Area consisting of Preston, South Ribble and Chorley Councils. It found an estimated annual shortfall of 723 affordable homes in Chorley, compared to 397 in Preston and 660 in South Ribble. Chorley therefore has the highest shortfall across the HMA.
- 6.2 The Central Lancashire Strategic Housing Market Assessment (September 2017) covered the same HMA as the 2009 SHMA. It covers the period 2014 to 2034 and identified a net need for 12,402 affordable homes across the HMA, equivalent to 620 per annum across the 20 years from the SHMA base date of 2014 up to 2034.
- 6.3 When this is broken down to local authority level, the SHMA (Table 59) finds a total annual need for 645 net affordable homes in Chorley. Table 59 also identifies that the annual supply from existing stock is 498 homes, meaning there is an annual net need of 146 affordable homes.
- 6.4 The Central Lancashire Housing Study Final Report (2020) is dated March 2020 and addresses (amongst other considerations) the revised definitions of affordable housing set out in the NPPF (February 2019) and the affordable housing need of the three Central Lancashire Councils.
- 6.5 Table 5.6 (estimated need for rented affordable housing per annum) finds that within Chorley in the 18-year period between 2018 and 2036, there is a net need for 132 rented affordable homes per annum. The overall need figure for Central Lancashire is 590 dwellings per annum.
- 6.6 Table 5.7 provides a comparison of affordable housing needs assessments with the 2017 SHMA, which found an overall need of 620 affordable homes per annum.
- 6.7 Crucially, at paragraph 5.22 the study identifies that, *“For the individual local authorities, the analysis in this report shows a slightly higher level of need in Chorley, but lower in the other two authorities. Regardless, both studies clearly demonstrate a*

substantial need for additional affordable housing and the Councils should seek to maximise delivery where opportunities arise” (my emphasis).

- 6.8 In analysing affordable home ownership, the study found no net requirement for provision based upon identified needs and current supply.
- 6.9 However, this appears to be significantly qualified in paragraph 5.45 which states that, “*Given the analysis above, it would be reasonable to conclude, on the basis of the evidence, that in general terms there is no substantive need to provide housing under the new definition of ‘affordable home ownership.’ Overall whilst there are clearly some households in the gap between renting and buying, they in many cases will be able to afford homes below lower quartile housing costs. This said, it is important to recognise that some households will have insufficient savings to be able to afford to buy a home on the open market (in terms of the ability to afford both a deposit and stamp duty) and low cost home ownership homes - and shared ownership homes in particular - will therefore continue to play a role in supporting some households in this respect*” (my emphasis).
- 6.10 Furthermore, the 2020 study identifies that, “the evidence points to a clear and acute need for rented affordable housing from lower income households, and it is important that a supply of rented affordable housing – around 70% of which should reasonably be social rent - is maintained to meet the needs of this group including those to which the authorities have a statutory housing duty” (my emphasis).

¹ Hence why the appeal proposal includes 30% Shared Ownership as part of the proposed Affordable Housing mix

Affordable Housing Delivery Chorley Borough

Section 7

- 7.1 Figure 7.1 demonstrates the delivery of housing and affordable housing in Chorley Brough over the 10-year period between 2009/10² and 2018/19. Since 20010/11 there have been a total of 6,432 net overall housing completions and 1,447 net affordable housing completions, equivalent to an average of just 145 net affordable dwellings per annum. There has been an average rate of 22% affordable housing delivery over the period.
- 7.2 Comparative analysis of net completions since 2009 (notwithstanding that Affordable Housing data is not available prior to 2010) shows that a cumulative shortfall of -2,795 affordable homes had arisen by 2014/15. This is equivalent to an average annual shortfall of 559 affordable homes for the period the data is available.
- 7.3 In the period between 2015/16 and 2018/19 a total of just 546 net affordable homes were delivered, representing just a fifth of the shortfall identified in 2014/15 against the SHMA that has been tested at Examination. The four-year total of 546 is less than the average annual shortfall of 559.
- 7.4 Even when consideration is given to the needs identified in the 2017 SHMA (146 net per annum in Chorley between 2014 and 2034) a shortfall has still arisen against this substantially reduced requirement. The already accrued shortfall of 101 affordable homes is equivalent to 69% of the annual need. If this shortfall was to be removed in the next 5 years (the PPG approach to removing backlog) the annual need would increase to 166³ affordable homes per annum.
- 7.5 In light of the identified level of need there is no doubt in my mind that the delivery of up to 54 affordable dwellings on the proposed site will make an important contribution to the affordable housing needs of Chorley Borough and should be afforded nothing less than **substantial weight** in the determination of this appeal.

² Start of the Core Strategy plan period

³ 101/5 + 146 = 166

Affordability Indicators

Section 8

- 8.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability, albeit in the context of Plan making. Nevertheless, market signals are an important consideration in assessing the weight to be ascribed to the benefit of providing affordable housing.

Affordability Indicators

- Housing Register:

At 1 April 2020 there were a total of 655 households on the Housing Register with an identified affordable housing need within the Borough.

Despite various alterations to the allocation policies in 2013 and 2018 it is important to remember that these are real people, in real need, now.

- Private Market Rents:

The average lower quartile monthly rent in Chorley Borough in 2018/19 was £475⁴ pcm. This represents a 6% increase from the figure reported in 2013/14⁵ where average lower quartile monthly rents stood at £450 pcm.

The 2018/19 figure for Chorley Borough exceeds the average for the North West region which stood at £450 pcm over the same period.

- House Prices:

The National Housing Federations Home Truths for the North West of England 2018/19 analysis reported that the average house price in Chorley Borough is now £194,086.

By comparison, the average annual earnings in the Borough in 2017/18 were £28,085⁶, a 38% increase from 2010/11 where the figure stood at £20,405. In terms

⁴ Valuation Office Private Rental Market Statistics

⁵ When current records began

⁶ Based on Valuation Office Agency data

of house prices themselves, the NHF reported that the average house price within Chorley in 2017/18 was £194,086, a 15% (£169,091) increase since 2010/11.

Data taken from Zoopla⁷ indicates that the average price paid for a home in Euxton over the past 12 months ranged from £147,515 for a terraced property, £167,350 for a semi-detached property and £295,982 for a detached property.

- Affordability:

For those seeking a lower quartile priced property the ratio of lower quartile house price to incomes in Chorley Borough stands at 6.88, a 10% increase since the start of the plan period where it stood at 5.82. It is currently the highest on record.

- 8.2 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Chorley Borough, with an average house price to average income ratio of seven.
- 8.3 Market signals indicate a worsening trend in affordability in Chorley and within Euxton, and by any measure of affordability, this is a Borough in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

⁷ <https://www.zoopla.co.uk/market/euxton/?q=Euxton%2C%20Lancashire> [Accessed 19 May 2020]

Response to LPA's Statement of Case

Section 9

- 9.1 The LPA set out several matters in relation to the need for affordable housing in their Statement of Case (SoC).
- 9.2 In respect of the affordable housing benefits, the listed sites will not fully provide for all the people remaining in need of an affordable home in Euxton, and it is important to consider them individually and cumulatively. **Appendix JS30** sets out the likely affordable housing delivery the next 5 years, based on the Council's most recent Five Year Housing Supply Statement (2020).
- 9.3 At paragraph 6.44 of their SoC the Borough Council boldly state, "*There is no need for this development to come forward for affordable housing to be provided...., as at 26/06/19 there were 868 people on the Housing Register of which only 34 selected Euxton as their preferred location. Of these only 18 had a local connection to Euxton.*" However, the FOI response dated 12 May 2020 reveals that the number of households on 1 April 2020, who selected Euxton as their preferred location, was in fact 180 households. This is a 429% increase above the figure relied upon by the Council.
- 9.4 The FOI further reveals that of the 180 households, 124 have an established local connection to the wider Chorley Borough and out of the 124, 17 currently reside in Euxton (and would qualify based on a local connection of residence). Although, critically, the FOI response goes on to reveal that, "the 107 households who currently do not live in Euxton may still have a local connection through family, employment or previous residence but this information is not available and would be something what would be checked by the social landlords at the point of offer".
- 9.5 Evidently, the information in the SoC seems to somewhat underplay the significance of the wider local connections and in my opinion thereby misinforms the Inquiry. Not least this is because there are 180 who have expressed Euxton as their preferred choice of location and there are 124 who have a local connection with Euxton. This is in stark contrast to the figures of 34 and 18 presented in paragraph 6.44 by the Council.
- 9.6 Therefore, in contrast to the Council's claim that the site is not needed, I consider that there is a great and pressing need for more affordable homes in Euxton to meet the needs identified in the FOI response.

- 9.7 At paragraph 6.43 of their SoC, the Council appear to denigrate the affordable housing offer as being merely policy compliant, indicating that, “*The appeal scheme is delivering 54 affordable dwellings however, this is not in excess of what is required by Core Strategy Policy 7 (page 78) which sets down the approach to the delivery of affordable and special needs housing*”.
- 9.8 I present evidence that Policy 7 of the Core Strategy is drafted as a benefit of the proposal; it is not drafted in mitigation or to ward off a harm. The fact that the appeal offer is policy compliant is not a reason to reduce the weight given to affordable housing in the planning balance.
- 9.9 Lastly, the Council claim there is no need to deliver the site now. However, the future delivery of Affordable Housing in Chorley is highly uncertain. Analysis contained in **Appendix JS30** reveals that the Council’s likely supply from allocated sites with planning permission is 178 affordable homes, 47 from allocated sites without planning permission and 58 from windfalls. This is a total of 283 affordable homes or 57 a year.
- 9.10 **Appendix JS30** also identifies that the appellants’ likely supply is slightly less with 171 coming from allocated with planning permission, zero from allocated sites without planning permission (site delivery is disputed by Gladman Developments) and 58 from Windfalls. This equates to 236 affordable homes or 47 a year.
- 9.11 The Council appears to have committed to an average of around 57 net affordable dwellings per annum on site over the next five years. This figure falls substantially short of the Council’s annual affordable housing requirement of 146 net affordable dwellings in the 2017 SHMA and the 132 identified in the recent 2020 Housing Study by Icenii.
- 9.12 Furthermore, compared to the average delivery of 145 net dwelling in the past 10 years, is reasonable to conclude the affordable housing supply in Chorley has collapsed.
- 9.13 As such, I disagree with the Council’s statement. The appeal site is very much needed now.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 10

- 10.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The revised NPPF (2019) is clear that the Government seeks to significantly boost the supply of housing.
- 10.2 There is an acute need for affordable homes in Chorley with the 2009 SHMA, which was tested at Examination, identifying a shortfall of 723 net affordable homes per annum between 2009 and 2014. Comparative analysis of gross completions since 2009 shows that a shortfall of -2,795 affordable homes had arisen by 2014/15 alone.
- 10.3 Even when consideration is given to the needs identified in the 2017 SHMA, (146 net per annum in Chorley between 2014 and 2034) a shortfall of 101 affordable homes has still arisen since the base period of the SHMA in 2014.
- 10.4 The Council's record of past delivery should be viewed in the context of the fact that at 1 April 2020 there were a total of 655 households on the Housing Register with an identified affordable housing need within the Borough. With over 25% (27.5%) of the register expressing a preference for a home in Euxton. It is important to remember that these are real people, in real need, now.
- 10.5 The acute level of affordable housing need will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.
- 10.6 In addition to the shortfall in delivery against the objectively assessed need for affordable housing identified in the SHMA, other indicators further point to an affordability crisis in the Borough. Affordability in the Borough has been and continues to be, in crisis. House prices and rent levels in both the average and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Chorley out of the reach of more and more people.

- 10.7 Future delivery appears to have collapsed with just 63 homes per annum likely to come forward for each of the next 5 years.
- 10.8 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Chorley Borough, with an average house price to average income ratio of seven.
- 10.9 Market signals indicate a worsening trend in affordability in Chorley and within Euxton, and by any measure of affordability, this is a Borough in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.
- 10.10 This demonstrates an acute need for affordable housing in Chorley Borough and one which the Council and decision makers need to do as much as possible to seek to address. Indeed, they are required to do so, and proactively, by the revised NPPF (2019).
- 10.11 The importance of affordable housing as a material consideration has been reflected in a number of Secretary of State (SoS) and appeal decisions. Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations. The decisions I have identified emphasise the great weight which the Secretary of State has, on various occasions, attached to the provision of affordable housing in the consideration of planning appeals.
- 10.12 From these decisions I conclude the following:
- Affordable housing is an important material consideration;
 - The importance of unmet need for affordable housing being met immediately;
 - The Secretary of State has attached ‘significant weight’ and ‘substantial weight’ to the provision of affordable housing as a substantial benefit; and
 - Even where there is a five year housing land supply material benefits of the scheme can weigh in favour of development.
- 10.13 Given the Council’s past performance towards meeting its identified housing needs across the Borough, I consider that nothing less than **substantial weight** should be afforded to the delivery of affordable housing through the appeal scheme in the planning balance.