

Proof of Affordable Housing Evidence of Ewan Wright BA (Hons)

Land at Oakley Farm, Cheltenham, GL52 6PW

EWAN WRIGHT

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Oakley Farm Appeal Affordable Housing Statement:

Section 1: Qualifications and Experience:

- 1.1 My name is Ewan Wright and I hold the position of Housing Strategy and Enabling Officer at Cheltenham Borough Council. I have worked for Cheltenham Borough Council since November 2018. I hold a First Class Honours in BA History from the University of Birmingham and I have worked in the affordable housing sector for 3 years.

Section 2: Introduction

- 2.1 On 13th August 2021, the Council received the Appellants' Affordable Housing Proof of Evidence for the Land at Oakley Farm, Cheltenham. The Council has specifically prepared this Affordable Housing Statement as supplementary to, and in rebuttal of, the Affordable Housing Proof of Evidence submitted by the Appellant, which, in the absence of essential accompanying context, offers the impression of an "affordable housing crisis engulfing Cheltenham".
- 2.2 To provide essential context surrounding the need, demand and delivery of affordable housing in Cheltenham, the Council's affordable housing statement will seek to contextualise Cheltenham's affordable housing situation, thereby enabling the Planning Inspector to make an informed decision regarding the weight to be attributed to the affordable housing provision as part of the planning balance.
- 2.3 To be clear, the Council acknowledges that a considerable affordable housing need exists within the Borough, which is compounded by an unmet backlog of affordable housing need across all affordable housing tenures. Additionally, it is acknowledged that the Council faces a range of challenges that may impact affordable housing delivery.
- 2.4 Notwithstanding these points, my evidence will illustrate that, in seeking to demonstrate that the Borough has a 'huge' shortfall of affordable housing delivery compared to identified needs, the proof of affordable housing evidence provided by James Stacey amounts to an oversimplification of the Borough's affordable housing situation.
- 2.5 Specifically, this affordable housing statement will address each of the following issues in turn:
 - Housing Homelessness and Rough-Sleeping Strategy
 - Evidence Bases of Affordable Housing Need
 - Past Affordable Housing Delivery in Cheltenham Borough
 - Future Affordable Housing Delivery in Cheltenham Borough
 - Affordable Housing Demand in Cheltenham Borough (Move to Section 3?!)
 - The National Affordable Housing Position
 - Affordable Housing Statement Concluding Remarks

Section 2: Housing, Homelessness and Rough-Sleeping Strategy:

- 2.1 The proof of evidence provided by James Stacey fundamentally overlooks the crux of the Council's [2018-2023 Housing, Homelessness and Rough Sleeping Strategy](#), namely that increasing the supply of affordable housing in Cheltenham Borough alone will not be sufficient to resolve the multi-faceted issues associated with affordable housing delivery. Instead, a more holistic approach is required,

involving steps to reduce homelessness, making best use of current stock (e.g. by tackling empty homes and addressing serious health & safety hazards in the private sector) and improving the health and wellbeing of our communities (through designing schemes to promote a sense of belonging and tackling anti-social behaviour).

In this vein, notable outcomes achieved by the Council since the publication of the Council's 2018-2023 Housing, Homelessness and Rough Sleeping Strategy include, but are not limited to:¹

- Between 2018/19 and 2020/21, nearly 2,200 homes in Cheltenham's private sector have been made safer.
- Between 2018/19 and 2020/21, Cheltenham Borough Homes (CBH) Housing Options Team helped to prevent or relieve homelessness for 986 households.
- Alongside partners, CBC has delivered 195 major Disabled Facilities Grant (DFG) adaptations since 2018/19, enabling disabled or frail people to remain in their homes and communities.
- Between 2018/19 and 2020/21, working with registered providers (RPs), CBC have delivered 154 new homes as 'additionality' (i.e. affordable housing delivery above and beyond what market forces would normally deliver), including 79 homes delivered by the CBC through CBH.
- Between 2018/19 and 2020/21, Cheltenham Borough Homes (CBH) have enabled 44 households to downsize from family-sized accommodation via Cheltenham's Help to Move Scheme.

Section 3: Evidence Bases of Affordable Housing Need

- 3.1 In seeking to establish affordable housing need and subsequently calculate the shortfall of affordable housing delivery in the Borough, the Appellant draws heavily upon the 2015 SHMA Update Note, with the appellants' narrative and overarching case being both premised upon and underpinned by figures drawn from the 2015 SHMA.
- 3.2 It is not surprising, therefore, that the Appellant explicitly refers to the 2015 SHMA as the primary housing evidence base for establishing affordable housing need (paragraphs 8.7-8.11), whilst not recognising the [2020 primacy of the Gloucestershire Local Housing Need Assessment](#).²
- 3.3 To justify utilising the SHMA, the appellant casts doubt upon the reliability of the LHNA on the basis that the 2020 LHNA does not take account of households living in the Private Rented Sector (PRS). The appellant suggests that, if these households were included within the annual housing need figure, this would increase Cheltenham's affordable housing need by 52% to 295 dwellings per annum.
- 3.4 The appellant certainly makes a fair point. However, the fact that the LHNA's excludes households in PRS when determining affordable housing need does not automatically make the LHNA an unreliable mechanism for determining affordable housing need, contrary to the appellants suggestion.
- 3.5 Scrutinising the narrative found within the LHNA justifying this decision provides further clarity. The LHNA's position is not unequivocal. Indeed, the LHNA recognises that if, housing benefit support was no longer provided (or if there wasn't sufficient PRS housing available at a price that they could afford), then this would correlate with an increase in affordable housing need.

¹ Outcomes referred to within this statement have been collated from the July 2018, July 2019, July 2020 and July 2021 Housing, Homeless and Rough Sleeping Action Plan shared with [Cheltenham Borough Council's Cabinet](#).

² Affordable Housing Evidence of James Stacey BA (Hons) Dip TP MRTPI, Land at Oakley Farm, Cheltenham, pp. 46-47 (Accessed 23.08.21)

- 3.6 As James Stacey's evidence of proof acknowledges, reference to PRS is notably absent from the Government's definition of affordable housing (found in Annex 2 of the July 2021 NPPF).³ In fact, as the LHNA notes, the Government makes a clear distinction between the role of affordable housing, and the role of the PRS, emphasising the importance of PRS in accommodating a range of housing needs.⁴
- 3.7 Examining the Borough's adopted planning policies, it is quickly apparent that the Appellant's position (in utilising the 2015 SHMA Update Note to determine affordable housing need) is contrary to Cheltenham Borough's adopted policy position. [The Joint Core Strategy \(JCS\)](#) Policy SD11: Housing Mix and Standards states that- "Development should address the needs of the local area... as set out in... the *most up-to-date* (note my emphasis) SHMA".⁵ Therefore, if (as the Appellant notes in Paragraph 5.5), the 2020 Local Housing Needs Assessment (LHNA) represents the Council's most up-to-date affordable housing evidence base, why does the Appellant consistently employ the outdated 2015 SHMA as a framework for establishing affordable housing need?
- 3.8 The validity of using the 2015 SHMA to inform affordable housing need is also called into question by current Government policy. The July 2021 National Planning Policy Framework (NPPF) states that- "To determine the minimum number of homes needed, strategic policies should be informed by a *local housing needs assessment* (note my emphasis), conducted using the standard method in national planning guidance".⁶ In light of updates to the Government's standard method (in 2019) and the SHMA's September 2015 publication date, it is clear that the 2015 SHMA Update Note cannot comply with the Government's policy requirements, and thus should not be used as an evidence base to inform affordable housing need.
- 3.9 Put simply, therefore, the Appellants approach towards calculating affordable housing need stands fundamentally at odds with both local and national policy, and, in turn, should not be used to determine the Borough's affordable housing need or indeed any identified affordable housing shortfall.

Section 4: Past Affordable Housing Delivery in Cheltenham Borough

- 4.1 A centrepiece of the Appellants' argument derives from the claim that the Council has, to quote, "a woeful record of affordable housing delivery" which (in the appellants view) is compounded by a "failure (by the Council) to plan for a significant boost in the supply of affordable homes".⁷ Addressing the Council's past affordable housing delivery record, the Appellant identifies a Borough-wide shortfall of -1,160 affordable homes, leaving the Council to deliver 463 affordable homes per annum between 2021/22-2025/26 to meet identified affordable housing needs.⁸
- 4.2 As this statement has established, these figures are inflated by the misapplication of the 2015 SHMA Update Note to calculate both affordable housing need and the Council's affordable housing shortfall. Yet, even in view of the fact that the Council has a significant affordable housing shortfall compared to the LHNA's identified housing need, the Appellants analysis fails to provide a balanced, contextualised analysis of affordable housing delivery in Cheltenham Borough.

³ National Planning Policy Framework (NPPF), July 2021, p. 64.

⁴ 2020 Gloucestershire Local Housing Needs Assessment (LHNA), p.97.

⁵ [Gloucester, Cheltenham and Tewkesbury Joint Core Strategy \(JCS\) 2011-2031](#), (Adopted Dec 2017), p. 79. (Accessed 23.08.21).

⁶ [National Planning Policy Framework \(NPPF\)](#), (July 2021), Paragraph 61, p. 17. (Accessed 23.08.21).

⁷ Affordable Housing Evidence, p. 35.

⁸ *Ibid*; p.58.

- 4.3 This approach is best reflected within the Appellant's focus upon the Borough's 'net' affordable housing delivery, which serves, at best, to undermine a nuanced understanding of the wider context of affordable housing delivery within the Borough.⁹ By examining both net and gross affordable housing delivery in the round, a more holistic assessment of Cheltenham's affordable housing context can be reached. To illustrate this point, the Inspector is referred to Appendices 1 and 2, which present Cheltenham Borough's gross and net affordable housing delivery from 2011/12 to 2020/21 (Appendix 1) and 2015/16 to 2020/21 (Appendix 2) respectively.
- 4.4 Whilst it is true that affordable housing delivery has a tendency to fluctuate over time, Appendix 1 reflects a consistent upward growth in both gross and net affordable housing delivery, with a gross total of 720 new affordable homes completed between 2011/12, with 386 gross new affordable homes being delivered between 2016/17-2020/21.
- 4.5 Quoting Council FOI statistics, the Appellant suggests that Cheltenham's affordable housing delivery has been disproportionately low when compared to market delivery (Paragraph 5.56).¹⁰ Although there is some truth in this argument, by predicating this evidence on the basis that all market schemes should deliver 40% affordable housing, the Appellant distorts the reality of local affordable housing delivery. For example, adopted JCS Policy SD12 is clear that affordable housing provision will not be sought on sites that fall below 11 dwellings. Consulting [Residential Land Availability Reports](#) between 2011/12 and 2019/20 reflects that 1,785 dwellings either fell under the affordable housing requirement, or, alternatively, were not obliged to deliver affordable housing (i.e. through a C2 Use Planning Class application).
- 4.6 In reality, therefore, only 1,785 net dwellings qualified for an affordable housing requirement in the first place. Comparing this figure against net affordable housing delivery (396 dwellings) reflects an average of 22% affordable housing delivery over this period.
- 4.7 Another strand of the appellants' analysis quotes the Council's 2018-2023 Housing, Homelessness and Rough Sleeping Strategy in an attempt to imply that the Council is overly reliant upon Section 106 sites to deliver affordable housing in the Borough.
- 4.8 The Council recognises that Section 106 delivery has made (and continues to make) a significant contribution to affordable housing delivery in the Borough. Yet, by omitting reference to the Council's plan to mitigate this issue, the appellant weakens the strength of their case. By way of illustration, the Inspector should refer to Appendix 3, which details the Council's affordable housing delivery between 2017/18- 2020/21, broken down via delivery by S.106 and 'additionality' (i.e. affordable housing delivery above and beyond what the market would normally provide) respectively.
- 4.9 Appendix 3 provides strong evidence to dispel the appellants claim that the Borough is overly reliant upon S.106 delivery. Indeed, of 351 new affordable homes delivered between 2017/18 and 2020/21, 191 new affordable homes, (representing 54% of total delivery) were secured as additionality, clearly indicating the Council's commitment to delivering a step change in affordable housing delivery in practice.
- 4.10 Any balanced analysis of Cheltenham's affordable housing situation would be incomplete without acknowledging that past affordable housing supply has been constrained by delays to the JCS Strategic Allocations. Collectively, Cheltenham's two Strategic Allocations have the potential to deliver

⁹ Please refer to Paragraph XIV of the Appellants Affordable Housing Evidence for further information.

¹⁰ *Ibid*; p.27.

upwards of 1,825 new affordable homes.¹¹ Indeed, the stated purpose of the JCS is to assist Cheltenham in accommodating the Borough's unmet housing needs, as, due to the constrained nature of the Borough, Cheltenham cannot fully accommodate our housing needs without assistance from Tewkesbury Borough.

- 4.11 The appellant has focussed upon the problems associated with the delivery of the strategic sites in respect of the housing land supply and I submit that, in a similar vein, it is also appropriate to recognise the effect of these problems in respect of the delivery of affordable housing. The Council recognises that these sites will deliver the planned affordable housing units but over an extended time frame.
- 4.12 Rather, therefore, than reflecting a failure to plan to accommodate affordable housing need, this context demonstrates that site delays are a major contributor to a hiatus in affordable housing delivery rather than a lack of planning- as alleged by the appellant. Accordingly, to consider net affordable housing delivery in isolation is to effectively neglect the valuable context explaining how Cheltenham has arrived in this situation.

Section 5: Future Affordable Housing Delivery in Cheltenham Borough:

- 5.1 The Appellant notes that the Council's future affordable housing delivery pipeline is "highly uncertain", before stating that- "the delivery of a higher number of affordable homes one year does not guarantee this will continue in future".¹² Whilst predicting affordable housing delivery can be difficult, it is telling that the Appellant relies upon the 5YHLS to estimate the level of affordable housing delivery instead of offering directly relevant quantitative evidence (i.e. figures indicating the scale of the Council's affordable housing pipeline).
- 5.2 By applying the Sedgefield Approach, Appendix 4 establishes that the Council has a projected shortfall of 1,910 affordable homes between 2021/22-2026/27.¹³ This figure (1,910) represents a 20% reduction in the identified shortfall of affordable homes (405 affordable homes) compared to the affordable housing shortfall identified provided by the appellant (2,315 affordable homes). At any rate, the Council accepts that the revised shortfall still constitutes a notable shortage which should be addressed by forthcoming affordable housing delivery.
- 5.3 A summary of the Council's gross indicative affordable housing delivery pipeline can be found in **Appendix 5. It should** be noted that figures recorded under the 'delivery timelines TBD' and the 'Strategic Allocations' are yet to receive full planning permission. Appendix 5 reflects that the Council has a potential delivery capacity of 2,801 homes (subject to Planning Permissions being granted and sites coming forwards as anticipated).
- 5.4 Cross analysing this substantial shortfall against projected delivery, **(see Appendix 5) reflects that 757** new affordable homes could be delivered between 2021/22-2025/26, equating to an average gross delivery of 151 new affordable homes per annum. Currently, 203/757 affordable homes have been granted final planning permission.
- 5.5 Of the aforementioned 757 figure, it is notable that the Council are seeking to deliver the majority (372) of new affordable homes between 2021/22-2025/26 via CBH, demonstrating the Council's firm commitment to delivering a step-change in affordable housing delivery.

¹¹ Please note- figures drawn from [Golden Valley Supplementary Planning Document](#), p. 7. (Accessed 23/08/21), and planning application reference 16/02000/OUT for the Elms Park Strategic Allocation.

¹² Affordable Housing Evidence, p. 24.

¹³

- 5.6 The Council’s affordable housing pipeline also identifies that an additional 740 new affordable homes could be built on Council owned land (of which a minimum of 118 new homes will be delivered as ‘additionality’*), granting the Borough greater discretion over delivery timescales.¹⁴ Once again, it must be stressed that these homes have yet to receive planning permission.
- 5.7 Demonstrating the Council’s commitment to creating strong and sustainable communities, the [Council’s £37.5m acquisition of 45 hectares of prime development land](#) on the Golden Valley Strategic Allocation in particular cannot be overstated. This acquisition is likely to give the Council considerable discretion over the delivery of affordable housing and is indicative of the Council’s intent to significantly boost affordable housing supply.
- 5.8 Addressing the Council’s Strategic Allocations specifically, it is anticipated that a minimum of 1,825 new affordable homes could be delivered at the Elms Park (1,440 affordable homes) and [Golden Valley Strategic Allocations \(a minimum of 385 affordable homes\)](#) respectively, representing a significant contribution to meeting the identified shortfall of affordable housing need, albeit with the vast majority of homes likely to be delivered after 2025/26.¹⁵
- 5.9 Suggesting, therefore, that the Council have failed to plan to address affordable housing need is simply not borne out by a thorough assessment of the evidence.

Section 6: Affordable Housing Demand in Cheltenham Borough:

- 6.1 Considerable emphasis is placed upon Cheltenham’s “acute” affordable housing need, with the Appellant highlighting that: “The Council are actively failing to plan to address affordable housing needs... and have been for some time”.¹⁶ In support of this position, the appellant references a 16% rise in the number of households on the Council’s Housing Register from April 2020-April 2021 as proof of ‘acute’ housing need within the Borough.¹⁷
- 6.2 Yet, a more detailed analysis of longer-term trends reveals that the reverse position is apparent, with Housing Register figures remaining broadly consistent (falling by 4% between 2017-2021) and a 33% reduction in households with a Reasonable Preference between April 2017 (855) and April 2020 (570), following the publication of the [Council’s 2018 Housing, Homelessness and Rough Sleeping Strategy](#) and the introduction of the [Homelessness Reduction Act 2017](#), as illustrated within in Figure 1, below.

Figure 1: Gloucestershire Homeseeker Plus Figures, April 2017- April 2021

	Total no. on Homeseeker Plus - Cheltenham	Reasonable Preference* Households
April 2017	2417	855
April 2018	2492	858
April 2019	2479	705

¹⁴ ‘Additionality’ is defined for the purposes of this statement as affordable housing delivery over and beyond normal market-led delivery.

¹⁵ See Footnote 9.

¹⁶ Affordable Housing Evidence, p.26.

¹⁷ Affordable Housing Evidence, paragraph xiv.

April 2020	2175* ¹⁸	599
April 2021	2325	570

- 6.3 In contrast to appellants assertions to the contrary, lettings statistics covering the period 2017-18 to 2020-21 clearly demonstrate that the Council is, in fact, effectively meeting priority affordable housing need, as captured in Figure 2, below.

Figure 2: Total Lets via Homeseeker Plus- Cheltenham Borough Council 2017/18-2020/21

Financial Year	Total Lets via Homeseeker Plus (Cheltenham)	Lets to Households with a Reasonable Preference
2017/18	510	496
2018/19	478	461
2019/20	412	390
2020/21	368	330

- 6.4 Examining the figures found in Figure 3, above, 95% (1,677/1,768) of the total lets via Homeseeker in Cheltenham Borough were allocated to households with a reasonable preference (i.e. Households in Silver, Gold or Emergency Band Priority Need). This approach is consistent with the Council’s statutory obligations, as stipulated [within Part 6 of the Housing Act 1996](#), and indicates that the Council’s approach towards accommodating households in acute affordable housing need is working effectively.

Meeting ‘Local’ Affordable Housing Needs:

- 6.5 The Appellant highlights the Council’s perceived inability to meet local affordable needs in Battledown Ward, providing evidence to reflect ‘net’ affordable housing delivery drawn from FOI evidence provided by the Council. Whilst the Council doesn’t debate that affordable housing delivery in Battledown Ward has been comparatively low, once again, the Appellants approach shows a fundamental miscomprehension of how the Gloucestershire Homeseeker Plus system operates in practice. When allocating new affordable homes, Gloucestershire Homeseeker Plus seeks to allocate affordable housing against identified Cheltenham-wide need, rather than targeting the allocation of affordable homes at a Parish or Ward level. Accordingly, it must be recognised that, through the Homeseeker Choice Based Lettings Scheme, households can, and do, bid outside their immediate locality.
- 6.6 On this basis, any attempt to establish and justify the need for affordable housing on a ‘local’ (i.e. Parish or Ward basis) is not a reliable indicator of affordable housing need. On the grounds captured above, it is therefore logical to assess affordable housing need on a Borough-wide basis, rather than seeking to establish parish or ward level need.

¹⁸ It should be noted that, in Spring 2020, Gloucestershire Homeseeker Plus was temporarily suspended to cope with the influx of demand arising from the COVID-19 Pandemic. Accordingly, these figures should be approached with caution.

Section 7: The National Affordable Housing Position

- 7.1 The Council agrees with the Appellants' assertion that England is suffering from a national affordable housing crisis. However, the Council challenges the Appellants' interpretation that Cheltenham's affordable housing situation is an exceptional outlier from the wider national picture.

Average House Prices in Cheltenham Borough:

- 7.2 Within the submitted evidence, the Appellant attempts to make a clear distinction between Cheltenham's housing market and the national housing picture. In doing so, however, the Appellant utilises outdated figures, thereby inflating Cheltenham's average house prices beyond currently recognised levels. Illustrating this point, the Appellant draws upon 2018/19 National Housing Federation (NHF) data, which signals that Cheltenham's average house price (in 2018/19) stood at £332,953, compared to the English average of £303,006.
- 7.3 However, the [May 2021 UK House Price Index \(HPI\)](#) indicates that Cheltenham's average house price stood at £288,746 in May 2021, representing a 5.1% value increase from £274,702 in May 2020. By comparison, HPI data reflects that England's average house price in May 2021 was £271,434. Upon closer inspection of HPI statistics, Cheltenham's average house price stands as the 194th highest out of 342 English local authorities. Equally, whilst house prices rose in Cheltenham, the percentage house price increase was 288th lowest of 342 local authorities, being almost half of the national average at 9.7% from 2020-2021. Thus, whilst it is recognised that HPI figures are likely to vary from month-to-month, these statistics nevertheless support the view that Cheltenham's affordability position is not highly dissimilar to other English local authorities.
- 7.4 At first glance, the Appellant's analysis seemingly indicates that Cheltenham's housing market is unique when compared to national affordability, reflecting that the ratio of lower quartile house prices to average incomes in Cheltenham Borough has risen by 20% between 2012 and 2020.¹⁹ However, upon closer inspection, this trend does not represent a significant departure from the national picture or similar housing markets during this period. In fact, by comparing lower quartile house prices in 2012 and 2020 respectively across similar housing market areas using [ONS Affordability Ratios](#), as found in Appendix 6, one can demonstrate that lower quartile price rises have been felt far more acutely elsewhere.
- 7.5 In summary, the existence of a national affordable housing crisis is undisputed by this Council. However, it is important to differentiate between the admittedly difficult local picture and the wider national crisis impacting the delivery of affordable housing.

Section 8: Affordable Housing Statement Concluding Remarks

- 8.1 In summary, the Council recognises that a considerable shortfall of affordable housing delivery exists in Cheltenham Borough. Nevertheless, it is worth reiterating that the affordable housing issues facing Cheltenham will not be resolved by simply delivering new affordable housing supply, a point recognised within the Council's 2018-2023 Housing, Homelessness and Rough Sleeping Strategy. Accordingly, providing accompanying context is essential to reflect the reality of the Borough's affordable housing situation.

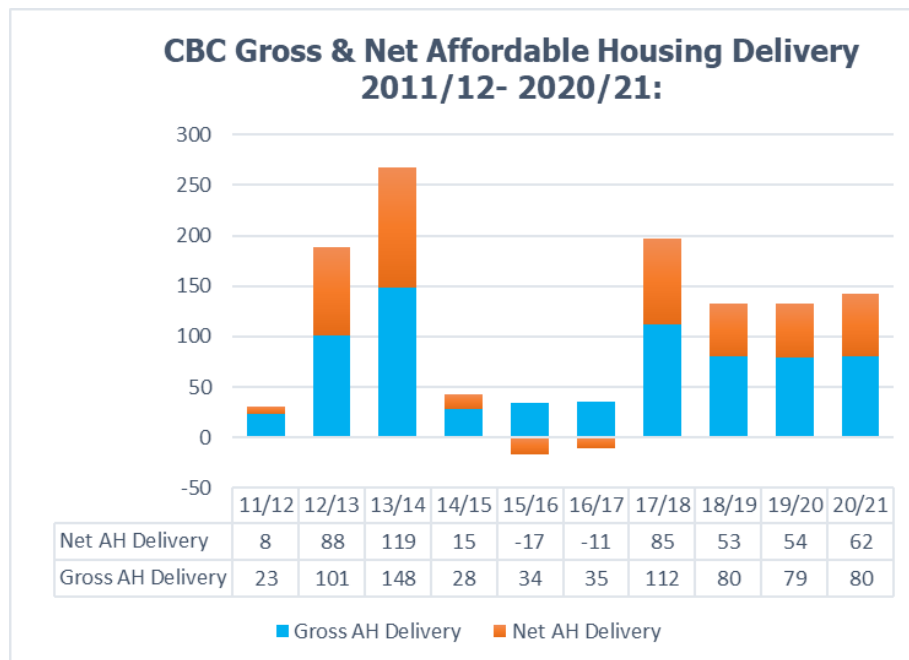
¹⁹ Affordable Housing Evidence, p. 32.

- 8.2 It is clear that affordable housing delivery has been comparatively low when compared to identified affordable housing needs. However, the narrative behind past delivery is both nuanced and multi-faceted, and cannot be appreciated by analysing statistical delivery of affordable housing in isolation. Put simply, therefore, the past delivery of affordable housing in Cheltenham Borough has been adversely impacted by policy constraints, (i.e. site falling below/not qualifying for an affordable housing obligation) delays to the Strategic Allocations and the inherently constrained nature of Cheltenham Borough. Detailed analysis of these factors remain notably absent from the appellants analysis, which ultimately provides a skewed picture of Cheltenham's affordable housing situation.
- 8.3 In spite of the appellants claims to the contrary, this affordable housing statement provides compelling evidence that the Council is on track to both realise a 'step-change' in affordable housing delivery and, critically, to address past shortfalls and current housing need. This point is epitomised within the Council's acquisition of a significant element of the Golden Valley Strategic Allocation, in addition to the Council's indicative affordable housing delivery pipeline consisting of 757 affordable homes (of which 372 new affordable homes could be delivered via CBH), notwithstanding the considerable outstanding delivery to be delivered through Cheltenham's Strategic Allocations.
- 8.4 Initially, the appellants claim that Cheltenham has an 'acute' level of affordable housing need would seem to be justified. However, as this statement demonstrates, by assessing affordable housing need over a longer time period (instead of taking a 'snapshot' picture of need), it is apparent that the number of households on the Council's Housing Register has remained consistent for the past 5 years. Perhaps more importantly, the evidence presented by this statement indicates that the number of households falling into a 'Reasonable Preference' band has fallen considerably by 33% since April 2017, indicating that the Council are effectively meeting acute housing needs. When viewed in the round, this evidence reflects that the Borough's actions (such as boosting affordable housing supply) has played an important role in alleviating acute housing needs.
- 8.5 After scrutinising the appellant's suggestion that Cheltenham's housing market and housing affordability is an outlier to the national average, a reasonable analysis of the available data reaches the opposite conclusion. Cheltenham's housing affordability is, in fact, broadly comparable with the national housing picture and similar housing markets. Of particular note, the evidence presented in this affordable housing statement indicates that house prices have rose more gradually in Cheltenham compared to similar housing markets across England, with Cheltenham's lower quartile house prices rising by 35% between 2012-2020 compared to a 47% increase in BANES, 42% in Wychavon and 37% in the Malvern Hills. To claim, therefore, that "affordability in the Borough has been and continues to be, in crisis" is not substantiated by the latest available evidence.²⁰
- 8.6 In summary, this Affordable Housing Statement illustrates and acknowledges that Cheltenham faces a range of challenges when delivering affordable housing in Cheltenham Borough to meet past, current and future affordable housing need. Even so, as this statement seeks to demonstrate, Cheltenham is not in an affordable housing crisis; to suggest otherwise would be to oversimplify the complex affordable housing situation in Cheltenham and to overlook the positive strides the Borough is taking to meet affordable housing need in the round. Conversely, the Borough is, as reflected within the outcomes achieved (see Page 3) taking a holistic approach towards managing the dynamic affordable housing situation, and has ambitious plans to boost the delivery of affordable housing supply moving forwards.

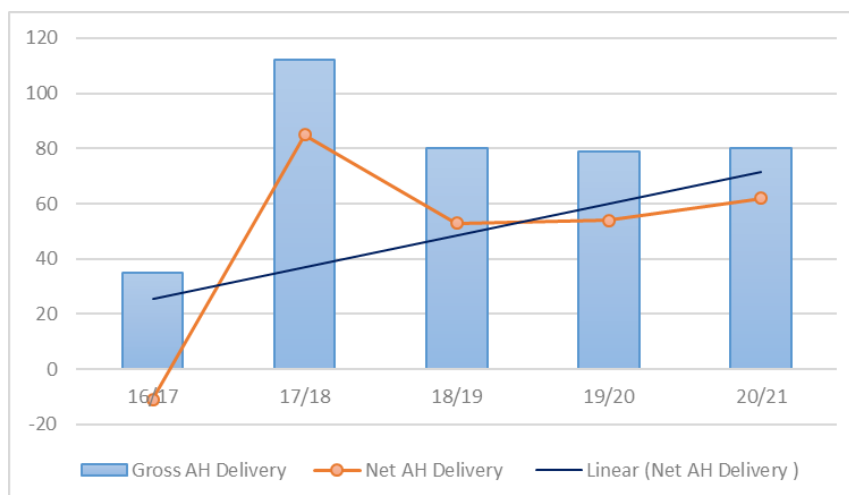
²⁰ Affordable Housing Evidence, P. 34.

Section 9: Appendices

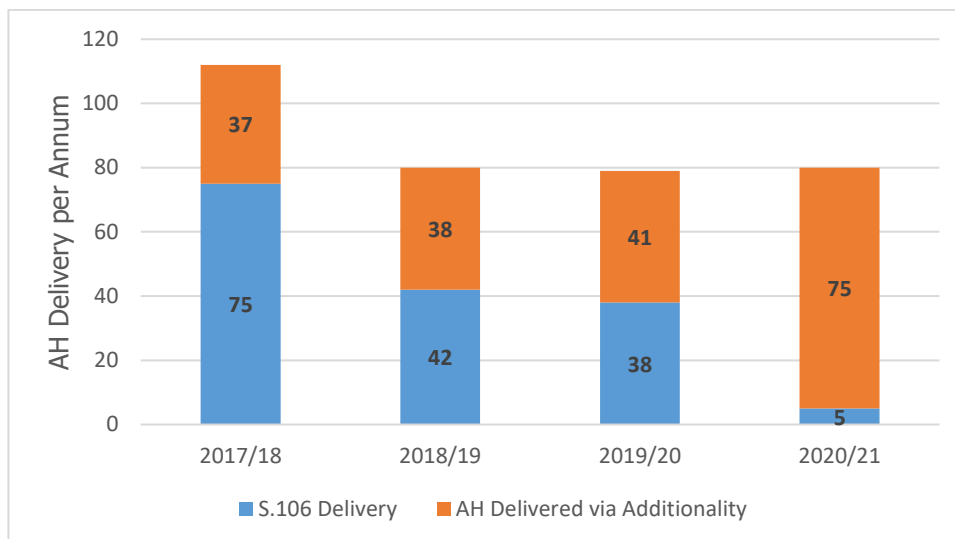
Appendix 1: CBC Gross & Net Affordable Housing Delivery Statistics 2011/12-2020/21



Appendix 2: CBC Gross & Net Affordable Housing Delivery, 2015/16-2020/21



Appendix 3: CBC Gross Affordable Housing Delivery, 'Additionality' vs S.106, 2017/18 to 2020/21

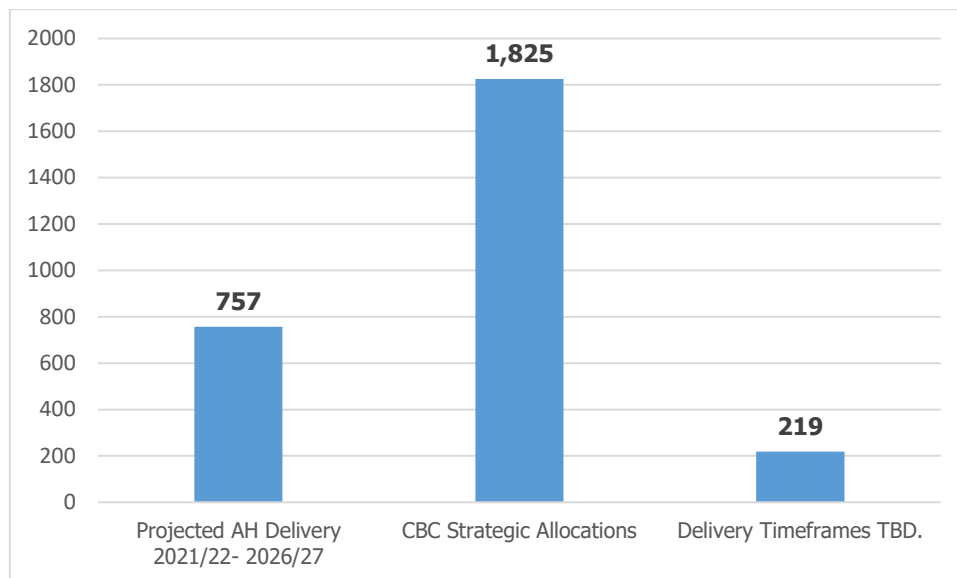


Appendix 4: CBC Affordable Housing Calculation 2021/22-2025/26.²¹

A	Affordable housing need per annum for the period 2015/16 to 2020/21 identified by the 2020 LHNA	194
B	Net affordable housing need for the period 2015/16 to 2020/21 (A x 6)	1,164
C	Net affordable housing completions from 2015/16 to 2020/21	226
D	Shortfall/backlog of affordable housing need for the period 2015/16 to 2020/21 (B-C)	938
E	Backlog affordable housing need per annum required over the period 2021/22 to 2025/26 (D/5)	188
F	Full affordable housing need per annum for the period 2021/22 to 2025/26 (A+E)	382
G	Full affordable housing need for the period 2021/22 to 2025/26	1,910

²¹ Please note that these figures have been calculated using a combination of the 2020 Gloucestershire Local Housing Needs Assessment and the Sedgfield Approach.

Appendix 5: CBC Gross Indicative Affordable Housing Delivery Pipeline



Appendix 6: Lower Quartile House Prices by LPA (£), Sept 2012-Sept 2020 (ONS)

Local Planning Authority:	Average Lower Quartile House Prices Sept 2012	Average LQ House Prices Sept 2020	% LQ House Price Rise Sept 2012- Sept 2020
Worcester	£130,000.00	£170,500.00	31%
Cheltenham	£148,000.00	£200,000.00	35%
Malvern Hills	£153,500.00	£209,975.00	37%
Harrogate	£156,500.00	£216,250.00	38%
Wychavon	£149,995.00	£213,500.00	42%
BANES	£169,950.00	£250,000.00	47%
Epsom	£241,000.00	£355,000.00	47%
Tunbridge	£192,250.00	£285,000.00	48%