

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

Land at Longsight Road, Langho



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Outline planning application for up to 300 residential dwellings, associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access to, but not within, the site).

Land at Longsight Road, Langho

Hallam Land Management Limited

December 2025

OUR REF: M25/0708-01.RPT

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Contents

Section 1	Introduction	1
Section 2	Affordable Housing as an Important Material Consideration	4
Section 3	Consequences of Failing to Meet Affordable Housing Needs	7
Section 4	The Development Plan and Related Policies	19
Section 5	Affordable Housing Needs	24
Section 6	Affordable Housing Delivery	27
Section 7	Affordability Indicators	36
Section 8	Benefits of the Proposed Affordable Housing at the Appeal Site	43
Section 9	Conclusions and Recommendations	45

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Appendices

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| Appendix JS1 | Freedom of Information Correspondence (21 November 2025) |
| Appendix JS2 | Extracts from Planning Practice Guidance (March 2014, Ongoing Updates) |
| Appendix JS3 | Appeal Decision: Land at Sondes Place Farm (November, 2023) |
| Appendix JS4 | Appeal Decision: Land to the West of Langton Road, Norton (July 2016) |
| Appendix JS5 | Appeal Decision: Coombebury Cottage, Dunsfold (May 2024) |

Introduction

Section 1

1.1 This Affordable Housing Proof of Evidence has been prepared by James Stacey BA (Hons) Dip TP MRTPI of **Tetlow King Planning** (“TKP”) on behalf of **Hallam Land Management Limited**. It examines the need for affordable housing in the Ribble Valley Borough Council administrative area (where the appeal site is located), as well as the local need for affordable housing in Langho.

1.1 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 (“RTPI”).
- I have over 30 years professional experience in the field of town planning and housing. I was first employed by two local authorities in the south west and been in private practice since 2001.
- During career I have presented evidence at more than 170 section 78 appeal inquiries and hearings. I act for cross-section of clients and advise upon a diverse range of planning housing related matters.
- In December 2022 I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.
- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plan documents and supplementary planning documents on affordable housing throughout the UK.

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

"The evidence which I have prepared and provide for this appeal in this proof of Evidence is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."

1.3 I further confirm that no part of this evidence has been assisted by the use of Artificial Intelligence (AI).

1.4 Outline planning permission is sought for up to 300 residential dwellings, of which 30% are proposed as affordable homes equivalent to up to 90 affordable. This level of provision meets the requirements of Policy H3 of the Core Strategy (2014).

1.5 The proposed affordable housing will be secured by way of a Section 106 planning obligation, with the tenure split of the development to be agreed with the Council at this later stage.

1.6 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government.

1.7 This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), and recent Written Ministerial Statements which acknowledge the need to address an *"acute and entrenched housing crisis"*.

1.8 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.9 My Proof of Evidence considers the need for affordable housing and the contribution that the proposed development can make towards meeting the affordable housing needs of the Ribble Valley Borough Council administrative area and of Brockhall & Dinckley Ward and Billington & Langho Ward, and MSOA¹ Ribble Valley 007 'Whalley & Brockhall' where the appeal site lies.

1.10 It also takes account of a range of affordable housing indicators as well as consideration of national planning policy, performance against plan requirements, affordability issues, and the Council's own corporate objectives.

¹ Middle layer Super Output Areas, or MSOAs, are statistical areas that are used for the reporting of local-level statistics such as house prices and Census data.

- 1.11 I conclude that there is a genuine and acute need for the proposed affordable homes now, and that **substantial² positive weight** should be attributed to the provision of affordable housing at the appeal site in the planning balance.
- 1.12 In undertaking this work, I place reliance upon data obtained through a Freedom of Information (“FOI”) request to the Council which is included at **Appendix JS1** to this Proof of Evidence.
- 1.13 My Proof of Evidence comprises the following eight sections:
- Section 2 establishes the importance of affordable housing as an important material consideration;
 - Section 3 considers the consequences of failing to meet affordable housing needs;
 - Section 4 reviews relevant Development Plan policies and other material considerations relevant to the site;
 - Section 5 provides analysis of affordable housing needs;
 - Section 6 examines past affordable housing delivery;
 - Section 7 identifies a range of affordability indicators;
 - Section 8 identifies the benefits of the proposed affordable housing at the appeal site; and
 - Section 9 sets out our conclusions and recommendations.

² For clarity, the weightings applied are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

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

National Planning Policy Framework (12 December 2024)

- 2.2 The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-taking processes.
- 2.3 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) 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."* (Emphasis added).
- 2.4 At the heart of the NPPF is the presumption in favour of sustainable development contained at paragraph 11. Under paragraph 11c, proposals which accord with an up-to-date development plan should be approved without delay. Under paragraph 11d, where the most important policies are out of date, permission should be granted unless the policies in the NPPF provide a strong reason for refusal, or where any adverse impacts of the scheme significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.
- 2.5 The December 2024 revisions to the NPPF expand the decision-taker's assessment under paragraph 11d to have *"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"* (my emphasis). In doing so, the **NPPF now makes affordable housing a central part of**

applying the presumption to which the decision-taker must have particular regard.

- 2.6 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:

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

- 2.7 It should be stressed that paragraph 61 identifies the ‘overall aim’ as to meet an area’s identified housing need. Paragraph 62 clarifies that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.”*

- 2.8 The NPPF places a core responsibility on all major developments (involving the provision of housing) to provide affordable housing. In particular, paragraph 66 establishes that *“where major development involving the provision of housing is proposed, 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.”*

- 2.9 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *“housing for sale or rent, for those whose needs are not met by the market [...] and which complies within one or more of the following definitions”* before identifying four categories of affordable housing: Social Rent in accordance with Government’s conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

“Building the Homes We Need” Written Ministerial Statement (30 July 2024)

- 2.10 On 30 July 2024, the Secretary of State, Angela Rayner MP, delivered a Written Ministerial Statement (“WMS”) indicating the ‘direction of travel’ for the new Government’s intentions for national planning policy.

- 2.11 The WMS set out the Government’s aspirations to drive the delivery of affordable homes, stating that *“the Government are committed to the biggest growth in social and affordable housebuilding in a generation”* and setting an objective to deliver 1.5 million homes during the current Parliament.

“Building the Homes We Need” Written Ministerial Statement (12 December 2024)

- 2.12 In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government’s objective to deliver 1.5 million homes during the current Parliament and made a series of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

“This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters’ income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.” (my emphasis)

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.13 The Planning Practice Guidance (“PPG”) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application. **Appendix JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

- 2.14 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority of successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

- 3.1 The National Housing Strategy³ sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply. Despite the debate taking place over a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Ribble Valley.
- 3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:
- “I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”*
- 3.4 When asked to clarify the word “*crisis*” by the MP for Tewkesbury, Nick Boles, commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.

³ Laying the Foundations: A Housing Strategy for England (November 2011)

3.5 In response to questions, Nick Boles reaffirmed that:

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

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

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

3.8 Mr Boles indicates that there are *“a lot of statistics to prove it”*. My evidence in subsequent sections sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now as it did in 2013.

3.9 Moving forward over a decade and a new Government, we see even more alarming comments from the Housing Minister, Matthew Pennycook. On 20 November 2024, the Minister addressed the Housing, Communities and Local Government Committee: He began with a powerful reminder:

“We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates.”

3.10 He went on to say:

It is not just the lives it blights; it is also the impact on our economy. We are all suffering. The public services we rely on, for example, are harmed by the fact that we are consuming ever larger amounts of public money in the form of the rapidly rising housing benefit bill. The situation that we are in also hampers economic growth and productivity. It constrains the ability of our great towns and cities to realise their full potential. We are taking decisive action to tackle the housing crisis and boost economic growth.

Consequences of Failing to Meet Affordable Housing Need

- 3.11 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.
- 3.12 In August 2019 the Children’s Commissioner produced a report titled “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” to investigate the impact of homelessness and in particular the effect of this upon children.
- 3.13 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms⁴.
- 3.14 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
- 3.15 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that “*Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work*”.
- 3.16 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a “*deeply disruptive impact on family life*”. This can include lack of support (from grandparents for example) and travel costs.

⁴ The Children’s Commissioner Report references a National Audit Office Report titled ‘Homelessness’ (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 3.17 It found that a child's education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children's educational development can also be delayed.
- 3.18 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety. This is particularly so for families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 3.19 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a "*significant impact on many aspects of their lives*".
- 3.20 More recently, in May 2021, Shelter published its report "*Denied the Right to a Safe Home – Exposing the Housing Emergency*" which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that "*we will only end the housing emergency by building affordable, good quality social homes*" (page 10).
- 3.21 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

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

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

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

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

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

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

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

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

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

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

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

- 3.24 In April 2022 Shelter published a further report titled “*Unlocking Social Housing: How to fix the rules that are holding back building*”. The first paragraph of the Executive Summary is clear that:

“Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings. Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food.”

- 3.25 The Executive Summary goes on to state that “**An affordable and secure home is a fundamental human need**” (emphasis in original) noting that one in three of us don’t have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

- 3.26 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the ‘infrastructure levy’. It states that:

“This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners.” (My emphasis).

- 3.27 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – “*That’s taxpayer money subsidising private landlords providing insecure and often poor-quality homes.*” The paragraph goes on to note that:

“The lack of social housing has not just pushed homeownership out of reach, it’s made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home.”

- 3.28 Regarding the temporary accommodation (“TA”) the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that “*TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies.*”

- 3.29 Page 11 goes on to highlight that *“Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in.”* This means that *“Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks.”*
- 3.30 The page goes on to conclude that *“As a result, the national housing benefit bill has grown. Tenants' incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. **There are now more private renters claiming housing benefit than ever before.**”* (emphasis in original).
- 3.31 Page 9 is also clear that *“Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters' housing benefit simply doesn't meet the cost of paying the rent.”*
- 3.32 In considering the consequences of this page 12 notes that *“With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution and homelessness.”*
- 3.33 Finally, page 21 is clear that:

“For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one's life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory, but also contributes to the threads of society by helping people contribute to their communities.”

The evidence is clear, the financial requirements to own one's home are out of reach for many. And many will spend years stuck in a private rented sector that's not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them.” (My emphasis).

- 3.34 The consequences of failing to provide enough affordable homes were also recognised by the Inspector in a recent decision in Mole Valley where I provided affordable housing evidence. Inspector McGlone (**Appendix JS3**) was clear at paragraph 88 of his decision that:

“The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”

- 3.35 It is also pertinent to highlight that Ribble Valley themselves recognise the consequences of failing to meet affordable housing needs.

The Cost of Living Crisis

- 3.36 On 8 March 2024, the House of Commons published its ‘Rising Cost of living in the UK’ briefing report⁵ which highlights the affordability of goods and services for households.

- 3.37 The briefing report details at Section 5.1 that *“47% of adults in Great Britain reported an increase in their cost of living in February 2024 compared to a month ago.”* Moreover, Section 5.1 further specifies that *“64% of those who reported a rise in the cost of living between 14 and 25 February 2024 said they are spending less on non-essentials as a result, while 45% reported using less energy at home and 40% report cutting back on essentials like food shopping. 3% were being supported by a charity, including food banks.”*

- 3.38 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits.

- 3.39 Shelter published a briefing report in September 2022 titled ‘Briefing: Cost of Living Crisis and the Housing Emergency’ which further explains the private rented sector problem on page one:

“LHA which determines the amount of housing benefit private renters receive has been frozen since March 2020 while private rents have risen 5% in England – and even more in some parts of the country. The freeze has left low-income private

⁵ Source: <https://commonslibrary.parliament.uk/research-briefings/cbp-9428/>

renters in an incredibly precarious position. 54% of private renters claiming housing benefit have a shortfall to their rent.” (My emphasis).

- 3.40 The Shelter briefing sets out that low-income households (including those at risk of homelessness) have no choice but to turn to the private rented sector due to a severe shortage of affordable housing, and concludes on page two that *“the only sustainable solution is to address the causes of the housing emergency by investing in truly affordable social homes”*.

The Cost of Temporary Accommodation

- 3.41 In my opinion the cost of temporary accommodation is an important material consideration in the determination of this appeal.
- 3.42 BBC News reported on 13 October 2023 that English Councils spent more than £1.7bn on temporary accommodation for homeless people in the 2022/23 financial year. In my opinion this is a significant cost arising primarily as a consequence of a lack of affordable housing to adequately house people in need.
- 3.43 The article highlighted that the figure, published by the Ministry of Housing, Communities and Local Government (“MHCLG”), has increased by around 9% from the previous year. B&B accommodation alone in 2022/23 accounted for almost £500m in gross costs, increasing by a third on the previous year.
- 3.44 Shelter's chief executive Polly Neate was quoted in the article, stating that the amount spent on temporary accommodation was not only *“outrageous, but it's also illogical”*. She went on to say that:

“We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home. [..]”

This decision combined with the decades of failure to build enough social homes has meant that families can't find anywhere affordable to live and as a result are forced into homelessness in cramped and unsuitable temporary accommodation, often miles away from their children's schools and support networks.” (Emphasis added)

- 3.45 Inside Housing reported in October 2023 that homelessness in England is continuing to increase, with figures published in July 2023 showing the number of people in temporary accommodation was at a record high and that the number of children in this situation is also at the highest level since records began in 2004.

- 3.46 On the 5 March 2024 MHCLG published data on the age of children under ten in temporary accommodation. The study found that there were 86,945 children under the age of ten living in temporary accommodation at the 30 June 2023, with 19,430 of these children less than 12 months old.
- 3.47 The Inside Housing article also highlighted that the growing cost of temporary accommodation is putting local authorities' budgets under strain. It noted that that Hastings Borough Council recently faced bankruptcy, partly due to its large expenditure on temporary accommodation, which had risen to £5.6m per year, compared with £730,000 in 2019.
- 3.48 The report added that London councils are expected to overspend on temporary accommodation by £90m this year.
- 3.49 In December 2023, ITV News reported that almost one in five council leaders in England expect to issue Section 114 notices⁶ in 2024.
- 3.50 On the 23 January 2024, ITV News reported that the increasing cost of housing homeless people in temporary accommodation is putting local authorities on the brink of financial ruin.
- 3.51 The ITV News article added that according to homelessness charity Crisis, some 298,430 households approached their local council for homelessness support in the past year. Jasmine Basran, head of policy and campaigns at Crisis, said:
- "Crippling financial pressures from rising living costs, unaffordable rents and a severe lack of social homes is forcing more and more people into homelessness."*
(Emphasis added)
- 3.52 The ITV News article continued, adding that Eastbourne Borough Council ("EBC") is currently spending 49p of every £1 on temporary accommodation for homeless people. Stephen Holt, the leader of EBC said ministers must "recognise the gravity of this situation" and work out how to resolve it "before it is too late", adding that:
- "Simply put, without government intervention to tackle the tremendous cost of temporary accommodation and homelessness, the next step for many councils of all stripes is emergency budgets and section 114 notices."*

⁶ A section 114 notice means the council cannot make new spending commitments and must meet within 21 days to discuss what to do next.

- 3.53 A further article from Inside Housing on 24 January 2024 reported that the surge in spending on temporary accommodation could spell the “end of local government”.
- 3.54 The article highlighted that Councillors from across the political spectrum had expressed serious concerns over temporary accommodation spending at an emergency meeting in Westminster on 23 January 2024 where more than 50 local leaders met to discuss the “national crisis” caused by the cost of temporary accommodation.
- 3.55 I agree that the cost of housing people in affordable housing is spiralling out of control. I also agree with Polly Neate that, “*We simply can’t keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home.*”

Summary and Conclusions

- 3.56 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:
- A 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.
- 3.57 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.
- 3.58 I am strongly of the opinion that a step change in the delivery of affordable housing is needed now.

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

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the appeal should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises the Ribble Valley Core Strategy (adopted 2014) and the Housing and Economic Development – Development Plan Document (adopted 2019).
- 4.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the PPG (March 2014, ongoing updates), the emerging Ribble Valley Local Plan (2021-2038), and a number of corporate documents which support the provision of affordable housing at the corporate level.

The Development Plan

Ribble Valley Core Strategy 2008 to 2028 (adopted 2014)

- 4.4 The Ribble Valley Core Strategy was adopted in December 2014 and covers the 20-year plan period between 2008 and 2028. Paragraph 3.12 of the Core Strategy outlines the strategic objective to “*increase the supply of affordable and decent homes in the borough to help meet identified needs*”.
- 4.5 **Key Statement H3 (Affordable Housing)** at page 58 of the Core Strategy is the Council’s main affordable housing policy. The policy outlines that within the settlement boundaries of Clitheroe and Longridge, on housing developments of 10 units or more dwellings (or sites of 0.5 hectares or more, irrespective of the number of dwellings) an element of affordable, local needs housing will be required on all schemes. The policy adds that the Council will seek affordable housing provision at 30% of units on the site.
- 4.6 Policy H3 states that in all other location in the Borough, on developments of 5 or more dwellings (or sites of 0.2 hectares or more irrespective of the number of dwellings) **the council will require 30% affordable units on the site.**

- 4.7 The policy adds that the Council will only consider a reduction in this level of provision, to a minimum of 20% only where supporting evidence, including a viability appraisal fully justifies a lower level of provision to the council's satisfaction.
- 4.8 Policy H3 states that providing housing for older people is a priority for the Council within the Housing Strategy. The policy adds that within the negotiations for housing developments, 15% of the units will be sought to provide for older people on sites of 10 units or more. Within this 15% figure a minimum of 50% would be affordable and be included within the overall affordable housing threshold of 30%. The remaining 50% (ie the remaining 50% of the 15% older people's element) will be for market housing for older people.
- 4.9 Policy H3 outlines that all affordable housing provided must be made available to those in housing need and will remain affordable in perpetuity.
- 4.10 The Policy adds that developers will be expected to provide affordable housing on site as part of the proposed development unless Ribble Valley Borough Council and the developer both agree that it is preferable to make a financial or other contribution towards the delivery of affordable housing on another site.

Housing and Economic Development DPD 2008 to 2028 (adopted 2019)

- 4.11 The Housing and Economic Development - Development Plan Document ("HED DPD") was adopted in October 2019 and sets out more detailed policy coverage for matters relating to housing and economy.
- 4.12 Key Statement **DS1 (Development Strategy)** outlines on page 5 that the majority of new housing development will be
- *“concentrated within an identified strategic site located to the south of Clitheroe towards the A59; and*
 - *the principal settlements of: Clitheroe; Longridge; and Whalley.”*
- 4.13 Policy DS1 adds that *“In addition to the strategic site at Standen and the borough's principal settlements, development will be focused towards the Tier 1 Villages, which are the more sustainable of the 32 defined settlements”*. The settlement of Langho, where the appeal site lies, is listed as one of these defined settlements.

Other material considerations

Emerging Ribble Valley Plan 2021-2038

4.14 The Council consulted on the Regulation 18 draft Local Plan from 26 May 2022 to 7 July 2022. The Ribble Valley Local Development Scheme (LDS) published in March 2025 outlines the following timetable for producing the new Local Plan:

- *Second Regulation 18 Consultation - Autumn 2025*
- *Consultation on draft plan (Regulation 19) - January 2026*
- *Publication of Proposed Submission Documents - March 2026*
- *Submission - May 2026*
- *Examination in Public* 2026*
- *Adoption* December 2026*

**subject to Planning Inspectorate timetable*

4.15 Page 21 of the draft Local Plan document outlines that the local plan should *“increase the supply of affordable and decent homes in the borough to help meet identified needs in a sustainable manner”*.

4.16 Chapter 4.3 ‘Affordable Housing’ sets out on page 30 the emerging Local Plan’s key issues/aims for affordable housing. Paragraph 4.3.1 states that *“Affordability is a key issue within Ribble Valley as an area with very high housing values that continues to place pressure on many residents’ ability to access housing. The Council has pursued as a corporate objective a desire to try and re-balance the housing market by seeking to match needs with supply. This of course continues to be a challenge and the lack of truly affordable housing has an impact upon people being able to remain in their local area, live close to where they work or return to support older family members”*.

4.17 Paragraph 4.3.2 goes on to say: *“There are also ongoing issues around the availability of the right affordable stock to address people’s needs as well as tenures that people can afford with a well reported shortfall in affordable rented accommodation. The SHMA report sets out detail of key issues in relation to affordable housing and provides for the area, based on national guidance, an assessment of need for affordable housing”*.

- 4.18 Furthermore, paragraph 4.2.4 outlines that: *“The most recent SHENA calculates a need for affordable housing of some 88 dwellings annually. This is important in considering the housing requirement overall as the main mechanism for delivery relies on new house building”.*

Ribble Valley Borough Council Corporate Plan 2023-2027

- 4.19 The Ribble Valley Borough Council Corporate Plan 2023-2027 sets out the direction of the Council over the set period, ensuring that the needs of the communities are met.
- 4.20 Page 16 of the Plan outlines that Ribble Valley will *“Deliver good quality, affordable and sustainable housing that meets the needs of our communities”.*
- 4.21 Page 17 of the Plan adds that the Council will measure success by monitoring performance in respect of *“Meeting the housing needs of all sections of the community”.*

Ribble Valley Borough Council Homelessness Strategy 2022-2025

- 4.22 The Ribble Valley Borough Council Homelessness Strategy 2022-2025 sets out the Council's vision and objectives for services for homelessness people.
- 4.23 Page 2 of the Strategy outlines the Council’s Vision and Objectives, stating:
“through partnership working with all stakeholders the Council’s strategy sets out to prevent homelessness, provide effective support for households who are or may become homeless and make available sufficient affordable accommodation within the borough.” (Emphasis added).
- 4.24 Page 6 of the Strategy also states that *“The availability of affordable housing is one of the most important needs for families and communities in the Ribble Valley”.* It adds *“Developing affordable housing is a corporate ambition of the Council to meet the identified ‘housing need’”.*
- 4.25 On page 6 of the Strategy it outlines that *“addressing affordability is a key factor in providing the homelessness service”.*
- 4.26 The impacts of affordability is discussed further at page 16, with the Strategy adding that it *“has a massive impact on all aspects of the homelessness service and is at the root of all obstacles in homelessness prevention. Affordability has always been a key barrier in Ribble Valley”.*

4.27 Whilst Page 20 the Strategy highlights that *“Although affordability has theoretically improved since the start of the economic downturn, there remains a large proportion of households in Ribble Valley that are unable to afford to buy”*.

4.28 Overall, it can be seen that addressing the availability of affordable homes is a key issue for the Council.

Conclusions on the Development Plan and Related Policies

4.29 The relevant Development Plan in respect of affordable housing for Ribble Valley currently comprises the Ribble Valley Core Strategy (2014), and the HED DPD (2019).

4.30 The evidence set out in this section clearly highlights that within adopted policy, the emerging Ribble Valley Local Plan and a wide 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 Ribble Valley.

4.31 The appeal proposals provide an affordable housing contribution which meets the requirements of the Core Strategy, Policy H3.

4.32 The up to 90 affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of the Borough, particularly when viewed in the context of past rates of affordable housing delivery which I consider in more detail in Section 6 of this proof of Evidence.

Affordable Housing Needs

Section 5

Introduction

- 5.1 In this section I explore the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the Borough.

The Development Plan

- 5.2 The 'Housing Trajectory Notes' on page 179 of the Core Strategy states that *"The plan requires that 30% of these are affordable (Policy H3). This results in 3,920 market dwellings and 1,680 affordable dwellings over the plan period. Annually the overall requirement equates to 280 dwellings per year which (shown as a red line on the chart) comprising 196 market dwellings and 84 affordable dwellings"*. As such, **the adopted Core Strategy sets a target of 84 affordable dwellings per annum**.
- 5.3 However, the affordable housing target mentioned above is underpinned by a severely dated evidence base. It is therefore important to consider the objectively assessed need for affordable housing within the most up-to-date assessments of local housing need, which crucially take into account the latest definition of affordable housing, as contained in the NPPF.

Housing Market Assessments

- 5.4 Ribble Valley have published several housing market assessments over the course of the past 17-years. These are summarised in turn below.

2008 Strategic Housing Market Assessment

- 5.5 The Core Strategy (2014) was informed by the findings of the 2008 Strategic Housing Market Assessment ("SHMA") which was published in December 2008. It should be noted that the SHMA is severely outdated and was produced prior to the introduction of the NPPF in 2012.

- 5.6 The SHMA identifies at page 77 the need for an additional **264 affordable dwellings per annum**. Page 78 of the SHMA adds that this figure is “*not designed to be an accurate or binding target for the provision of affordable rented housing as this scale of development would be extremely challenging*”.
- 5.7 Whilst the monitoring period is not clear from the content of the SHMA, it is assumed that the assessment applies to the local plan period as it underpins the adopted Core Strategy.

2020 Strategic Housing and Economic Needs Assessment

- 5.8 The 2020 Strategic Housing and Economic Needs Assessment (“SHENA”) was published in April 2020 by the consultancy Turley. Whilst the 2020 SHENA makes up part of the evidence base for the emerging Ribble Valley Local Plan, and is referenced within the Regulation 18 consultation document, it has since been updated by the 2025 Affordable Housing Needs Assessment.
- 5.9 I note that paragraph 18 sets out that **88 affordable dwellings per annum** are needed in Ribble Valley between 2019/20 and the remainder of the emerging plan period to 2032/33.

2025 Affordable Housing Needs Assessment

- 5.10 The 2025 Affordable Housing Needs Assessment (“AHNA”) was published in May 2025 by the consultancy JG Consulting. Paragraph 3.33 outlines that there is a need for **230 affordable dwellings per annum** between 2024/25 and 2027/28.
- 5.11 As set out in a meeting at Ribble Valley Borough Council on 29 May 2025⁷, the AHNA is to be used as a material consideration in determining planning applications with immediate effect, and as an evidence base document to support the development of housing policies in the emerging Ribble Valley Local Plan.
- 5.12 As such, the AHNA is the most recent ongoing affordable housing needs figure for Ribble Valley. It effectively supersedes the SHENA as the Council have approved the updated AHNA as an evidence base document to support the development of housing policies in the new Ribble Valley Local Plan. In my subsequent analysis I use this assessment as the best measure of current and future affordable housing need.

⁷ [Decision - Affordable Housing Needs Assessment | Ribble Valley Borough Council](#)

Summary and Conclusions

- 5.13 As set out within the Development Plan and its supporting housing evidence base, there is a pressing and ongoing need for new affordable homes in Ribble Valley.
- 5.14 The adopted Core Strategy sets a target of 84 affordable dwellings per annum between 2008/09 and 2027/28
- 5.15 The SHMA sets out a net affordable housing need of **264 affordable dwellings per annum** between 2008/09 and 2027/28. This assessment of housing need is severely outdated and does not consider the NPPF which was first published in 2012.
- 5.16 The SHENA sets out a net affordable housing need of **88 affordable dwellings per annum** between 2019/20 and 2032/33. Whilst this assessment of housing need was previously used to inform the emerging Ribble Valley Local Plan, it has since been replaced with the AHNA.
- 5.17 The AHNA sets out a net affordable housing need of **230 affordable dwellings per annum** between 2024/25 and 2027/28. The AHNA is the most up-to-date assessment of housing need and identifies a significantly higher affordable housing need in the next five years than the SHENA.
- 5.18 The AHNA has been recognised by the Council as the evidence base document to support the development of housing policies in the new Ribble Valley Local Plan. Of the affordable housing need assessments carried out in Ribble Valley, it should be given the most weight.

Affordable Housing Delivery

Section 6

Introduction

- 6.1 This section of my Proof of Evidence analyses the delivery of affordable housing in Ribble Valley. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the Borough.
- 6.2 Figure 6.1 illustrates the delivery of affordable housing (“AH”) in Ribble Valley since the start of the Core Strategy period in 2008/09.

Figure 6.1: Gross Additions to Affordable Housing Stock, 2008/09 to 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2008/09	75	37	49%
2009/10	89	43	48%
2010/11	69	27	39%
2011/12	147	61	41%
2012/13	172	29	17%
2013/14	183	45	25%
2014/15	345	113	33%
2015/16	300	78	26%
2016/17	390	86	22%
2017/18	400	92	23%
2018/19	412	116	28%
2019/20	559	163	29%
2020/21	453	115	25%
2021/22	499	62	12%
2022/23	546	149	27%
2023/24	349	64	18%
2024/25	332	96	29%
Total	5,320	1,376	26%
Average	313	81	26%

Source: Freedom of Information Response (21 November 2025)

- 6.3 Between 2008/09 and 2024/25, a total of 5,320 dwellings were delivered in Ribble Valley, equivalent to 313 per annum. Of these, 1,376 dwellings were affordable tenures, equivalent to 81 per annum. This equates to 26% gross affordable housing delivery.
- 6.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy (“RtB”) sales from existing Council and Registered Provider (“RP”) affordable housing stock.
- 6.5 At a national level over two million households have exercised their Right to Buy since it was introduced in 1980. In her Written Ministerial Statement of 30 July 2024, the former Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:

“Over the last five years, there has been an average of 9,000 council Right to Buy sales annually, but only 5,000 replacements each year. Right to Buy provides an important route for council tenants to be able to buy their own home. But the discounts have escalated in recent years and councils have been unable to replace the homes they need to move families out of temporary accommodation.”

- 6.6 Figure 6.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy period in 2008/09, net of Right to Buy sales. A net loss of 52⁸ affordable dwellings over this period equates to 4% of the gross affordable housing completions of 1,376 affordable dwellings over the 17-year period.

*** Continued Overleaf ***

⁸ 1 + 51 = 52 dwellings

Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2008/09 to 2024/25

Monitoring Year	Total housing completions (Net)	Additions to AH Stock (Gross)	LPA RtB sales	RP RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	<i>A</i>	<i>B</i>	<i>C</i>	<i>D</i>	<i>E</i> <i>B - (C + D)</i>	<i>F</i> <i>(E / A) X 100</i>
2008/09	75	37	0	n/a	37	49%
2009/10	89	43	0	n/a	43	48%
2010/11	69	27	0	n/a	27	39%
2011/12	147	61	0	0	61	41%
2012/13	172	29	0	3	26	15%
2013/14	183	45	0	8	37	20%
2014/15	345	113	0	6	107	31%
2015/16	300	78	0	8	70	23%
2016/17	390	86	0	4	82	21%
2017/18	400	92	0	3	89	22%
2018/19	412	116	1	1	114	28%
2019/20	559	163	0	6	157	28%
2020/21	453	115	0	3	112	25%
2021/22	499	62	0	4	58	12%
2022/23	546	149	0	0	149	27%
2023/24	349	64	0	5	59	17%
2024/25*	332	96	n/a	n/a	96	29%
Total	5,320	1,376	1	51	1,324	25%
Average	313	81	0	4	78	25%

Source: MHCLG and Freedom of Information Response (21 November 2025) *Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

6.7 Figure 6.2 demonstrates that on average between 2008/09 and 2024/25, the Council has added just 78 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 25% of the total average number of net housing completions. This figure is likely to fall even further if demolitions to existing stock were to be accounted for.

Affordable Housing Delivery Compared to Affordable Housing Needs

Affordable Housing Delivery Compared to the Core Strategy (2014) Target

6.8 Figure 6.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing target of 84 net affordable dwellings per annum between 2008/09 and 2027/28, as set out in the Core Strategy (2014).

Figure 6.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the Core Strategy (2014), 2008/09 to 2024/25

Monitoring Year	Additions to AH Stock (Net of RtB)	Core Strategy (2014) AH Target (Net)	Annual Surplus / Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2008/09	37	84	-47	-47	44%
2009/10	43	84	-41	-88	51%
2010/11	27	84	-57	-145	32%
2011/12	61	84	-23	-168	73%
2012/13	26	84	-58	-226	31%
2013/14	37	84	-47	-273	44%
2014/15	107	84	+23	-250	127%
2015/16	70	84	-14	-264	83%
2016/17	82	84	-2	-266	98%
2017/18	89	84	+5	-261	106%
2018/19	114	84	+30	-231	136%
2019/20	157	84	+73	-158	187%
2020/21	112	84	+28	-130	133%
2021/22	58	84	-26	-156	69%
2022/23	149	84	+65	-91	177%
2023/24	59	84	-25	-116	70%
2024/25*	96	84	+12	-104	114%
Total	1,324	1,428	-104	-104	93%
Average	78	84	-6	-	93%

Source: MHCLG, Freedom of Information Response (21 November 2025), and Core Strategy (2014)

* Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

- 6.9 Since the start of the Core Strategy period in 2008/09 affordable housing completions (net of Right to Buy) have averaged 78 net affordable dwellings per annum, against a target of 84 net affordable dwellings per annum. A shortfall of -104 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -6 affordable dwellings.
- 6.10 It is important to note that the needs figure identified in the Core Strategy is considerably lower than that identified in the SHMA (264 dwellings per annum), and the most recent AHNA (230 dwellings per annum).

Affordable Housing Delivery Compared to the 2008 SHMA

- 6.11 Figure 6.4 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 264 net affordable dwellings per annum between 2008/09 and 2027/28, as set out in the 2008 SHMA.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2008 SHMA, 2008/09 to 2024/25

Monitoring Year	Additions to AH Stock (Net of RtB)	2008 SHMA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2008/09	37	264	-227	-227	14%
2009/10	43	264	-221	-448	16%
2010/11	27	264	-237	-685	10%
2011/12	61	264	-203	-888	23%
2012/13	26	264	-238	-1,126	10%
2013/14	37	264	-227	-1,353	14%
2014/15	107	264	-157	-1,510	41%
2015/16	70	264	-194	-1,704	27%
2016/17	82	264	-182	-1,886	31%
2017/18	89	264	-175	-2,061	34%
2018/19	114	264	-150	-2,211	43%
2019/20	157	264	-107	-2,318	59%
2020/21	112	264	-152	-2,470	42%
2021/22	58	264	-206	-2,676	22%
2022/23	149	264	-115	-2,791	56%
2023/24	59	264	-205	-2,996	22%
2024/25*	96	264	-168	-3,164	36%
Total	1,324	4,488	-3,164	-3,164	30%
Average	78	264	-186	-	30%

Source: MHCLG, Freedom of Information Response (21 November 2025), and 2008 SHMA.

*Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

6.12 Since the start of the 2008 SHMA period in 2008/09 affordable housing completions (net of Right to Buy) have averaged 78 net affordable dwellings per annum, against a need of 264 net affordable dwellings per annum. A shortfall of -3,164 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -186 affordable dwellings.

Affordable Housing Delivery Compared to the 2020 SHENA

6.13 Figure 6.5 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 88 net affordable dwellings per annum between 2019/20 and 2032/33, as set out in the 2020 SHENA.

Figure 6.5: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2020 SHENA, 2019/20 to 2024/25

Monitoring Year	Additions to AH Stock (Net of RtB)	2020 SHENA AH Needs (Net)	Annual Shortfall / Surplus	Cumulative Surplus	Additions as a %age of Needs
2019/20	157	88	+69	+69	178%
2020/21	112	88	+24	+93	127%
2021/22	58	88	-30	+63	66%
2022/23	149	88	+61	+124	169%
2023/24	59	88	-29	+95	67%
2024/25*	96	88	+8	+103	109%
Total	631	528	+103	+103	120%
Average	105	88	+17		120%

Source: MHCLG, Freedom of Information Response (21 November 2025), and 2020 SHENA

*Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

6.14 Since the start of the 2020 SHENA period in 2019/20 affordable housing completions (net of Right to Buy) have averaged 105 net affordable dwellings per annum, against a need of 88 net affordable dwellings per annum. A surplus of 103 affordable dwellings has arisen over the six-year period, equivalent to an average annual surplus of 17 affordable dwellings.

6.15 It is important to note that the affordable housing need identified in the SHENA has since been replaced by a significantly higher ongoing need in the most recent AHNA.

Affordable Housing Delivery Compared to the 2025 AHNA

6.16 While direct comparisons with past affordable housing delivery are limited since the available data only extends to 2024/25, it is evident that recent delivery levels have fallen significantly short of the 230 affordable dwellings per annum target outlined in the AHNA. Figure 6.6 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 230 net affordable dwellings per annum between 2024/25 and 2027/28, as set out in the 2025 AHNA.

Figure 6.6: Gross Additions to Affordable Housing Stock vs Needs Identified in the 2025 AHNA, 2024/25

Monitoring Year	Additions to AH Stock (Gross)	2025 AHNA AH Needs (Net)	Shortfall	Additions as a %age of Needs
2024/25*	96	230	-134	42%

Source: Freedom of Information Response (21 November 2025), and 2025 AHNA

*Note: Right to Buy data is currently unavailable for the monitoring year 2024/25, therefore the affordable housing figure given for this year is gross.

6.17 In the first year of the 2025 AHNA period in 2024/25, there were 96 gross affordable housing completions, against a need of 230 net affordable dwellings per annum. This has resulted in a shortfall of -134 affordable dwellings in the first year of the period.

6.18 This shortfall in affordable housing delivery underscores the critical importance of ensuring that sites like the appeal site are assessed in a robust, fair, and balanced manner. Given the pressing need for affordable homes, such opportunities must not be overlooked or dismissed without thorough and objective consideration, as they may play a vital role in helping to meet the identified affordable housing need.

Affordable Housing Delivery in Brockhall & Dinckley Ward

6.19 Figure 6.7 illustrates the delivery of affordable housing in Brockhall & Dinckley Ward over the last two monitoring years⁹.

Figure 6.7: Gross Additions to Affordable Housing Stock in Brockhall & Dinckley Ward, 2023/24 and 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2023/24	0	0	0%
2024/25	20	0	0%
Totals	20	0	0%
Average	10	0	0%

Source: Freedom of Information Response (21 November 2025)

6.20 As Figure 6.7 shows, there have been a total of 20 net overall housing completions and zero affordable housing completions in Brockhall & Dinckley Ward over the past two monitoring years. Losses existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.

Affordable Housing Delivery in Billington & Langho Ward

6.21 Figure 6.8 illustrates the delivery of affordable housing in Billington & Langho Ward over the last two monitoring years.

Figure 6.8: Gross Additions to Affordable Housing Stock in Billington & Langho Ward, 2023/24 and 2024/25

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2023/24	20	6	30%
2024/25	11	0	0%
Totals	31	6	0%
Average	16	3	0%

Source: Freedom of Information Response (21 November 2025)

⁹ Ribble Valley's FOI response was only able to provide ward housing completions data for the last two monitoring years.

6.22 As Figure 6.8 shows, there have been a total of 31 net overall housing completions and six affordable housing completions in Billington & Langho Ward over the past two monitoring years. Losses existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.

Summary and Conclusions

6.23 In the 17-year period since the start of the Core Strategy period in 2008/09, net of Right to Buy affordable housing delivery represented 25% of overall housing delivery, equating to 78 affordable dwellings per annum.

6.24 Since the start of the Core Strategy period in 2008/09, against a need of 84 net affordable dwellings per annum, a shortfall of -104 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -6 affordable dwellings.

6.25 Since the start of the SHMA period in 2008/09, against a need of 264 net affordable dwellings per annum, a shortfall of -3,164 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -186 affordable dwellings per annum.

6.26 Since the start of the SHENA period in 2019/20, against a need of 88 net affordable dwellings per annum, a surplus of 103 affordable dwellings has arisen over the six-year period, equivalent to an average annual surplus of 17 affordable dwellings. It is important to note that the affordable housing needs figure identified in the SHENA has since been replaced with a significantly higher figure in the AHNA.

6.27 In the first year of the 2025 AHNA period in 2024/25, there were 96 gross affordable housing completions, against a need of 230 net affordable dwellings per annum. This has resulted in a shortfall of -134 affordable dwellings in the first year of the period.

6.28 In my opinion it is clear that a 'step change' in affordable housing delivery is needed now in Ribble Valley to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.

6.29 I consider that in light of the identified level of need there can be no doubt that the delivery of up to 90 affordable dwellings on the proposed site will make an important contribution to the affordable housing needs of Ribble Valley.

Affordability Indicators

Section 7

Introduction

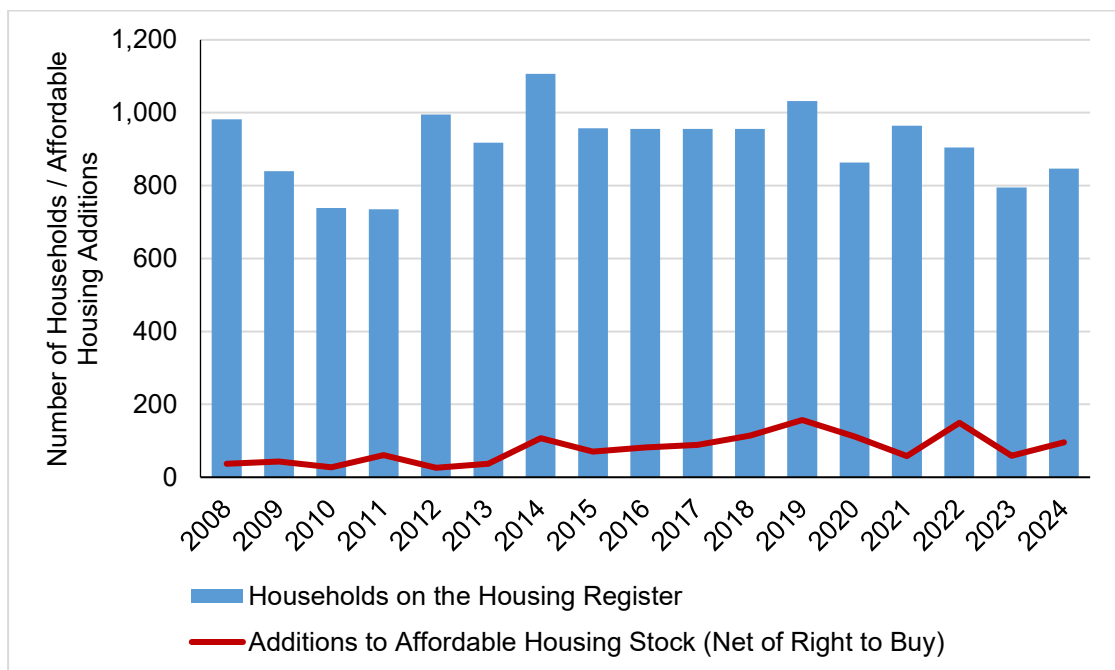
7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.

Housing Register

7.2 The Ministry of Housing, Communities and Local Government’s (MHCLG) data confirms that on 31 March 2024 there were **847 households on the Housing Register**. This is a 7% increase in a single year from 795 households on 31 March 2023.

7.3 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Ribble Valley since the start of the Core Strategy period in 2008/09.

Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2008/09 to 2024/25



Source: MHCLG Open Data and Freedom of Information response (21 November 2025).

- 7.4 As Figure 5.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Ribble Valley since 2008.
- 7.5 Footnote 4 of MHCLG¹⁰ Live Table 600 highlights that:
- “The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, contributed to a rise in the number of households on housing registers. The Localism Act 2011 then contributed to a decrease in the number of households housing registers, as it allowed local authorities to set their own qualification criteria.”*
- 7.6 Evidently the result of the Localism Act is that many local authorities, including Ribble Valley, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.
- 7.7 Following the changes brought about by the Localism Act, Ribble Valley published a revised Housing Allocations Scheme which received further revisions in **2023**.
- 7.8 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 7% in the past 12-months, indicating a worsening of affordability across Ribble Valley.
- 7.9 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 7.10 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. social rented, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

¹⁰ Ministry of Housing, Communities and Local Government

- 7.11 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the NPPF.
- 7.12 As such, the number of households on the Housing Register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

Temporary Accommodation

- 7.13 The Council's FOI response (**Appendix JS1**) confirms that on 31 March 2025, there were 11 households housed in temporary accommodation by the Borough. In 2023/24, Ribble Valley's gross spend on temporary accommodation costs was £83,000.

Homelessness

- 7.14 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023¹¹, the Council accepted 22 households in need of homelessness prevention duty¹², and a further 54 households in need of relief duty¹³ from the Council.
- 7.15 Page 16 of the Ribble Valley Borough Council Homelessness Strategy 2022 to 2025 states that affordability *"has a massive impact on all aspects of the homelessness service and is at the root of all obstacles in homelessness prevention"*. The Strategy adds that *"Affordability has always been a key barrier in Ribble Valley"*.
- 7.16 Furthermore a 2017 report by the National Audit Office ("NAO") found that *"The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England."*

¹¹ Homelessness data in Ribble Valley for 2023/24 is currently unavailable

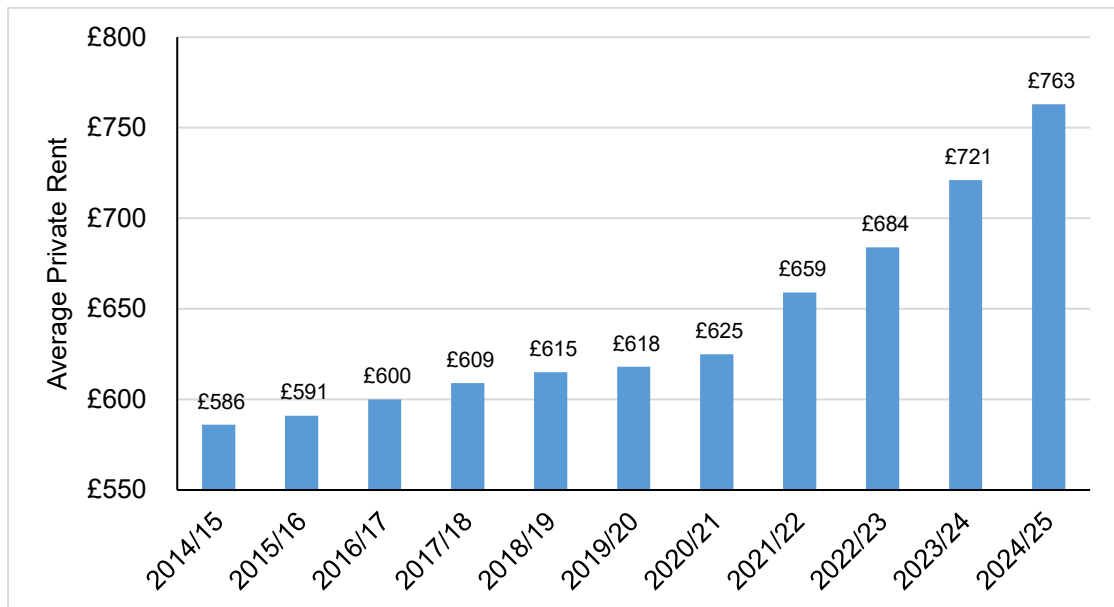
¹² The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

¹³ 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.

Private Rental Market

7.17 Office for National Statistics (“ONS”) data (first produced in 2014/15) shows that average (mean) private rents in Ribble Valley stood at £763 per calendar month (“pcm”) in 2024/25. This represents a 30% increase from 2013/14 where average private rents stood at £586 pcm.

Figure 7.2: Average (Mean) Private Sector Rents, Ribble Valley, 2014/15 to 2024/25



Source: VOA and ONS.

7.18 It should also be noted that since the start of the 2020 SHENA period in 2019/20, average rents in Ribble Valley have increased by 22%.

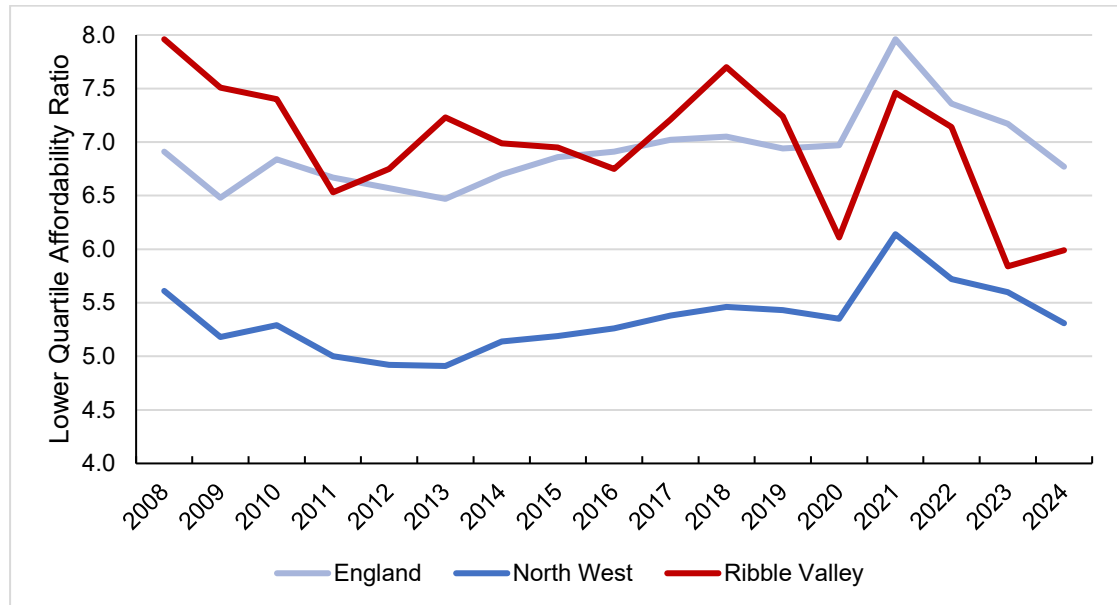
7.19 It is important to note that ONS rental data is calculated using all transaction data, i.e., existing lets as well a new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Ribble Valley.

Lower Quartile House Prices

7.20 For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to incomes in Ribble Valley in 2024 stood at **6.17**.

7.21 The ratio in Ribble Valley stands above the North West English region average of 5.42 (+14%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.

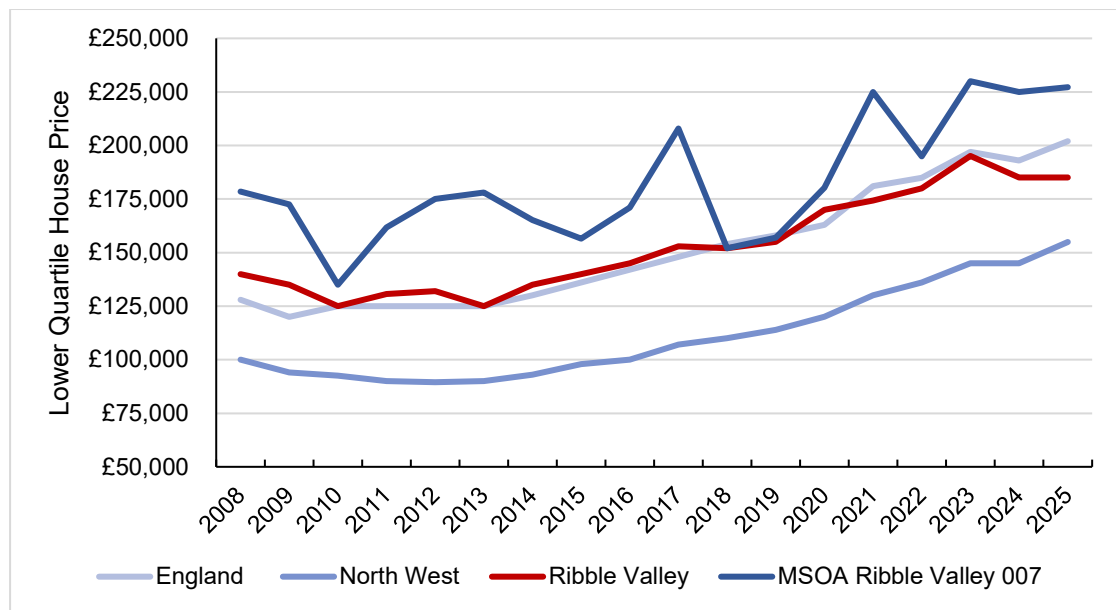
Figure 7.3: Lower Quartile Workplace-Based Affordability Ratio comparison, 2008/09 to 2024/25



Source: ONS.

- 7.22 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 37% higher than that.
- 7.23 Figure 7.4 illustrates the lower quartile house sale prices for England, the North West English region, Ribble Valley and MSOA Ribble Valley 007. It demonstrates that they have increased dramatically between the start of the Core Strategy period in 2008 and 2025.

Figure 7.4: Lower Quartile House Prices, 2008/09 to 2025/26



Source: ONS.

- 7.24 The lower quartile house price across Ribble Valley has risen by 32% from £140,000 in 2008 to £185,000 in 2025. Similarly, the lower quartile house price across MSOA Ribble Valley 007 has risen by 27% from £178,500 in 2008 to £227,212 in 2025. It should also be noted that since the start of the 2020 SHENA period lower quartile house prices in MSOA Ribble Valley 007 have increased by 45%.
- 7.25 In 2025 lower quartile house prices in MSOA Ribble Valley 007 (£227,212,000) were 23% higher than across Ribble Valley (£185,000), 47% higher than across the North West English region (£154,950) and 12% higher than the national figure (£202,000).

Summary and Conclusions

- 7.26 As demonstrated through the analysis in this section, affordability across Ribble Valley has been, and continues to be, in crisis.
- 7.27 House prices and rent levels in the 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 Ribble Valley out of the reach of more and more people.
- 7.28 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Ribble Valley, with a lower quartile house price to average income ratio of 6.17, which is 14% higher than the North West English region average of 5.42.

7.29 Market signals indicate a worsening trend in affordability in Ribble Valley and within MSOA Ribble Valley 007. In my opinion, by any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Benefits of the Proposed Affordable Housing at the Appeal Site

Section 8

Introduction

- 8.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 8.2 As set out in the previous chapter there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. Ribble Valley is no exception to this.
- 8.3 The appeal scheme will provide up to 90 affordable dwellings on site. The wider social and economic benefits of affordable housing commonly recognised.
- 8.4 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

Benefits of the proposed Affordable Housing at the appeal site

- 8.5 The affordable housing offer meets the requirements of adopted Policy H3 of the Core Strategy (30%). It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 8.6 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**Appendix JS4**) in September 2018 who was clear at paragraph 72 of their decision that:

“[I]n the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit” (my emphasis).

- 8.7 Similarly, as recognised in a recent appeal decision in at Coombebury Cottage, Dunsfold (**Appendix JS5**) *“the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs.”* The benefits of the proposed affordable homes at the appeal site should therefore be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.
- 8.8 The affordable housing benefits of the appeal scheme are therefore:
- Policy compliant offer of 30% (up to 90 dwellings) of the scheme provided as affordable housing;
 - A deliverable scheme which provides much needed affordable homes;
 - In a sustainable location;
 - Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation¹⁴; and
 - Greater security of tenure than the private rented sector.
- 8.9 In my opinion these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.

Summary and Conclusions

- 8.10 The acute level of affordable housing need in Ribble Valley, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can.
- 8.11 In my opinion, affordable housing is an individual benefit of the appeal proposals which should be afforded **substantial weight** in the determination of this appeal.

¹⁴ Watt a Save by HBF – October 2022.

Conclusions and Recommendations

Section 9

Introduction

- 9.1 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 9.2 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 9.3 Market signals indicate a worsening trend in affordability across Ribble Valley and, by any measure of affordability, this is an Authority amid an affordable housing emergency, and urgent action must be taken to deliver more affordable homes.

Affordable Housing Offer

- 9.4 Hallam Land Management Limited proposes the development of up to 300 dwellings of which 30% (up to 90 units) will be provided as affordable units at Land at Longsight Road, Langho. This level of provision meets the requirements of Policy H3 of the Core Strategy (2014).
- 9.5 The proposed affordable housing will be secured by way of a Section 106 planning obligation, and the tenure split of the development will be agreed with the Council at this stage.

Local Policy Position

- 9.6 The relevant Development Plan for the appeal site comprises the Ribble Valley Core Strategy (2014) and the Housing and Economic Development – Development Plan Document (adopted 2019).
- 9.7 I have clearly highlighted 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 Ribble Valley Borough Council.

Affordable Housing Needs

- 9.8 The Core Strategy (2014) identifies a need for 84 affordable dwellings per annum between 2008/09 and 2027/28.
- 9.9 The SHMA identifies a need for 264 affordable dwellings per annum, and whilst the monitoring period is not clear from the content of the SHMA, it is assumed that the assessment applies to the local plan period as it underpins the adopted Core Strategy.
- 9.10 The SHENA identifies a need for 88 affordable dwellings per annum between 2019/20 and 2032/33. Whilst the SHENA made up part of the evidence base for the emerging Ribble Valley Local Plan, and is referenced within the Regulation 18 consultation document, it has since been updated by the AHNA.
- 9.11 The AHNS identifies a need for 230 affordable dwellings per annum between 2024/25 and 2027/28. The AHNA is the most up-to-date ongoing affordable housing needs figure for Ribble Valley; effectively superseding the SHENA as the Council have approved the updated AHNA as an evidence base document to support the development of housing policies in the new Ribble Valley Local Plan.

Affordable Housing Delivery

- 9.12 On average between 2008/09 and 2024/25, the Council has added just 78 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 25% of the total average number of net housing completions.
- 9.13 Since the start of the Core Strategy period in 2008/09 affordable housing completions (net of Right to Buy) have averaged just 78 net affordable dwellings per annum, against a need of 84 net affordable dwellings per annum. A shortfall of -104 affordable dwellings has arisen over the 17-year period, equivalent to an average annual surplus of -6 affordable dwellings. However, it is important to note that the needs figure identified in the Core Strategy is considerably lower than that identified in the SHMA (264 dwellings per annum), and the most recent AHNA (230 dwellings per annum).
- 9.14 Since the start of the SHMA period in 2008/09 affordable housing completions (net of Right to Buy) have averaged just 78 net affordable dwellings per annum, against a need of 264 net affordable dwellings per annum. A shortfall of -3,164 affordable dwellings has arisen over the 17-year period, equivalent to an average annual shortfall of -186 affordable dwellings.

- 9.15 Since the start of the SHENA period in 2019/20 affordable housing completions (net of Right to Buy) have averaged 105 net affordable dwellings per annum, against a need of 88 net affordable dwellings per annum. A surplus of 103 affordable dwellings has arisen over the six-year period, equivalent to an average annual surplus of 17 affordable dwellings. However, it is important to note that the affordable housing need identified in the SHENA has since been replaced by a significantly higher ongoing need in the most recent AHNA.
- 9.16 In the first year of the 2025 AHNA period in 2024/25, there were 96 gross affordable housing completions, against a need of 230 net affordable dwellings per annum. This has resulted in a shortfall of -134 affordable dwellings in the first year of the period.
- 9.17 Given these significant shortfalls in affordable housing across Ribble Valley, the appeal proposals provide an affordable housing contribution which would contribute significantly towards addressing this key corporate priority

Affordability

- 9.18 In addition to the persistent shortfall in affordable housing delivery against objectively assessed needs other indicators further point to an affordability crisis in Ribble Valley. Set out below are the key findings in respect of affordability across the Borough:

Housing Needs

- a. On 31 March 2024 there were 847 households on the Housing Register. This represents a 7% increase in a single year from 795 households on 31 March 2023.
- b. On 31 March 2025, there were 11 households housed in temporary accommodation by the Borough.
- c. In 2023/24, Ribble Valley's gross spend on temporary accommodation costs was £83,000.
- d. In the 12 months between 1 April 2022 and 31 March 2023¹⁵, the Council accepted 22 households in need of homelessness prevention duty¹⁶, and a further 54 households in need of relief duty¹⁷ from the Council.

¹⁵ Homelessness data in Ribble Valley for 2023/24 is currently unavailable

¹⁶ 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.

¹⁷ 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.

Private Rental Market

- e. The average lower quartile monthly rent in Ribble Valley in 2024/25 was £763 pcm. This represents a 30% increase from 2014/15 where average lower quartile monthly rents stood at £586 pcm.

Lower Quartile House Prices

- f. The ratio of lower quartile house price to incomes in Ribble Valley now stands at 6.17, which is above the North West English region average of 5.42 (+14%).
 - g. In 2025 lower quartile house prices in MSOA Ribble Valley 007 (£227,212,000) were 23% higher than across Ribble Valley (£185,000), 47% higher than across the North West English region (£154,950) and 12% higher than the national figure (£202,000).
- 9.19 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Langho, as well as across Ribble Valley.
- 9.20 This demonstrates an acute need for affordable housing in Ribble Valley and one which the Council and decision takers need to do as much as possible to address as required to do so, proactively, by the NPPF (2024).

Summary and Conclusions

- 9.21 There are serious and persistent affordability challenges across Ribble Valley. This is exemplified by the affordability indicators which show a poor and worsening affordability across the Ribble Valley.
- 9.22 In my opinion there is an acute housing crisis in Ribble Valley, with a lower quartile house price to income ratio of 6.17. Mortgage lending is typically offered based on up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 37% higher than that.
- 9.23 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.

9.24 The affordable housing benefits of the appeal scheme are therefore:

- Policy compliant 30% (up to 90 dwellings) of the scheme provided as affordable housing;
- A deliverable scheme which provides much needed affordable homes;
- In a sustainable location;
- With the affordable homes managed by a Registered Provider;
- Which provide better quality affordable homes; and
- Greater security of tenure than the private rented sector.

9.25 Evidently, there can be no doubt that the provision of up to 90 affordable dwellings on this site to help those in acute need in Ribble Valley and in my opinion should be afforded **substantial weight** in the determination of this appeal.