

### **1 B**ACKGROUND

- 1.1 Brentwood is a sought-after location which supports a buoyant housing market. Its proximity to London and its excellent communication links, including the recently completed Elizabeth Line rail connection, result in high housing demand and high house prices.
- 1.2 The characteristics of the local housing market and economy give rise to substantial levels of affordable housing need among households of many types. Scarcity of housing development opportunities and pronounced competition for sites means that affordable housing is difficult to secure in Brentwood borough. The council is heavily reliant on the operation of the planning system to help it achieve a reasonable supply of new affordable homes to meet local needs.
- 1.3 The adopted Local Plan has earmarked a number of large strategic sites to help Brentwood respond positively to the demand and need for new homes. These sites are especially important to achieving a good supply of new affordable homes and to ensuring that the balance of that provision is appropriate to address the nature of local housing need and to contribute positively to ensuring that new or expanding communities have a sustainable and healthy mix of households.
- 1.4 Some of the existing published data influencing an understanding of local affordable housing need is not reflective of more detailed information on the nature of local housing need. It also doesn't reflect delivery and management considerations for affordable housing, nor the wider place-making requirements for new and expanded communities. The published data includes both the Strategic Housing Market Assessment 2016, which provided evidence to support the adopted Local Plan, and the subsequent Housing Needs Assessment 2022 (produced for South Essex as a whole).
- 1.5 Brentwood Borough Council (the Council) commissioned ARK Consultancy to undertake some research and analysis to help formulate more meaningful guidance on securing a suitable balance of new affordable homes in the borough. That research and analysis was focused on affordable housing need and did not consider other aspects and findings of the HNA 2022, for example market housing requirements.
- 1.6 The Council also asked ARK to consider accessibility standards for new affordable homes and to include in its recommendations an appropriate expectation for the balance of new homes which should offer good accessibility standards for people with mobility challenges and what these standards should be.
- 1.7 This document encompasses the findings and recommendations of the ARK study and has been accepted by the Council as planning practice guidance to support the implementation of adopted planning policy.



## 2 POLICY CONTEXT

### NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 2.1 NPPF articulates the Government's expectations for the principles underpinning the operation of the planning system in England. It is, effectively, the top tier of the statutory development plan and was updated in December 2024.
- 2.2 The following provisions in NPPF are relevant when considering how to achieve a suitable balance of housing in new developments:
  - 8 b) 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,
  - 11 b) strategic policies should, as a minimum, provide for objectively assessed needs for housing ...
  - 35 Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required,
  - 44 the right information is crucial to good decision making,
  - 61– the needs of groups with specific housing requirements are addressed...
  - 63 Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
  - 64 where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site ...
  - 77 c) set clear expectations for the quality of the places to be created and how this can be maintained ..... to secure a variety of welldesigned: homes to meet the needs of different groups in the community,
  - 135 a) planning policies and decisions should ensure that all developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;



### ADOPTED LOCAL PLAN

- 2.3 The current iteration of Brentwood's Local Plan was adopted in March 2022.
- 2.4 Some relevant Local Plan policy or content includes:
  - 6.1 it is important that new housing development addresses local needs and contributes to the creation of mixed and balanced communities. This means providing sufficient good quality housing of the right types, mix, sizes and tenure in the right places,
  - *Policy HPO1: Housing Mix 1*) all new residential development should deliver an inclusive, accessible environment throughout,
  - *Policy HPO1: Housing Mix 2)* on residential development proposals of 10 or more (net) additional dwellings the Council will require:
    - (a) an appropriate mix of dwelling types, sizes and tenures to meet the identified housing needs in the borough as set out in the Council's most up to date housing need evidence to provide choice, and contribute towards the creation of sustainable, balanced and inclusive communities, and
    - (b) each dwelling to be constructed to meet requirement M4 (2) accessible and adaptable dwellings, unless it is built in line with M4 (3) wheelchair adaptable dwellings,
  - Policy HP01: Housing Mix 3) on developments of 60 or more ... the Council will require all of the above, and: (a) a minimum of 5% of new affordable dwellings should be built to meet requirement M4 (3) ...
  - Policy HP05: 2b) Integration of the Affordable Housing the affordable housing be designed in such away as to be seamlessly integrated to that of market housing elements of a scheme (in terms of appearance, build quality and materials) and distributed throughout the development so as to avoid the over concentration in one area,
  - *Policy HP05: Affordable Housing 2c)* the type, mix, size and cost of affordable homes will meet the identified housing need as reported by the Council's most up-to-date housing evidence,
  - The Planning Obligations Supplementary Planning Document (December 2023) provides further detail of expectations in relation to affordable housing including the clustering of affordable dwellings and the requirement to create inclusive and mixed communities.



- 2.5 The Strategic Housing Market Assessment (SHMA) of June 2016 was the objectively assessed evidence base for the adopted Local Plan at the time the policies were formulated and adopted. Part 2 is the Objectively Assessed Need for Affordable Housing. The suggested typical mix for affordable housing provision is discussed in Section 3.
- 2.6 In June 2022, after the Local Plan was adopted, a further assessment of housing needs for Brentwood was published, as part of the HNA for the wider South Essex area. This assessment suggested a different mix for affordable housing provision which is discussed in some detail in Section 3.

## **3 DEMOGRAPHIC DATA AND NEEDS FORECASTS**

- 3.1 There are 77,000 people living in Brentwood according to the 2021 Census, this is an increase of 4.7% since the last Census in 2011. This increase is lower than the level for other districts in the East of England. The population aged over 65 has increased by 10.3%.
- 3.2 Families with dependant children are the single largest household type, at 28% of all households in Brentwood. Single households aged 65 and under make up 15% of all households. This aligns with the 2022 HNA projections for household need with the majority of dwelling types required being houses, at 70% of the total need.
- 3.3 As mentioned previously, the most recent published housing needs assessment for Brentwood was the assessment published in June 2022 for the whole of the South Essex area and carried out by Turley Associates. This was published after the adoption of the most recent iteration of the Local Plan. During the formulation of that Local Plan, including its examination in public, the housing needs data relied upon was the SHMA of 2016.
- 3.4 The 2016 SHMA and the 2022 HNA present very different forecasts for the preferred distribution of new affordable housing as follows (the 2016 SHMA projections informed Policy H05 of the Local Plan):

Tenure	% Split	Indicative Size					
		One bedroom	Two bedrooms	Three bedrooms	Four/+ bedrooms	Total Size	
Affordable rent / Social rent	86%	31%	24%	19%	26%	100%	
Other forms of affordable housing	14%	28%	36%	24%	12%	100%	



#### 3.5 2022 HNA suggested mix for Brentwood:

1 bed	2 beds	3 beds	4+ beds
49%	36%	14%	1%

- 3.6 The differences in the two proposed dwelling distributions are very pronounced. ARK undertook a review of the Turley Associates HNA document to try to understand why the results for Brentwood seemed so unusual and so different from those of the 2016 assessment.
- 3.7 The Government produces helpful guidance on the conduct of housing needs assessments. This is contained within nationally published Planning Practice Guidance (PPG) and that relating to housing needs assessments is mainly dated from 2015 but with 2020 updates. An assessment following this guidance is referred to as having adopted the 'standard method'.
- 3.8 The 'standard method' approach to forecasting the requirement for new homes actually applies a different methodology to the general housing requirement as it does to the affordable housing requirement.
- 3.9 Current gross need for affordable homes can be assessed by looking at past trends and current estimates for homeless households, those in priority need in temporary accommodation, households in overcrowded housing, concealed households, existing affordable housing tenants in need and households in other tenures in need and unable to rely on the market.
- 3.10 The process needs to identify new households forming with income insufficient to access lower quartile market housing.
- 3.11 Local planning authorities are expected to look at current stock of different sizes and assess whether these match current and future needs.

### THE SOUTH ESSEX HNA

- 3.12 The Turley report does advise the monitoring of emerging trends in the housing markets studied and the refinement of Turley's key assumptions. The report notes that 'there has been a particular lack of reliable data on accessible homes'.
- 3.13 In terms of general housing provision, the Turley report recognises that three-bedroom properties are the most needed in each of the six authorities included. For general housing provision, two in every three new homes should be houses. Brentwood is expected only to target 9% of new provision overall as one-bedroom dwellings.



- 3.14 Turley state that it has relied on information provided by Brentwood to arrive at the breakdown of size of affordable housing required. The report does not provide this data and ARK has checked with the Council officers who hold housing needs data and none could recall being asked by Turley for relevant information. Based on the data ARK has studied, it is difficult to understand how Turley arrived at a requirement of 49% of new affordable homes being 1 bed units.
- 3.15 Elsewhere in the Turley report it states that 'households with children would be expected to drive growth in Brentwood....' This observation does not seem to accord with the projected affordable housing requirement.
- 3.16 Another comment in the Turley report may illustrate a reason for the seeming misrepresentation of the requirements for affordable housing by dwelling type. It explains the approach taken to distributing the overall affordable housing requirement by dwelling type.

'This stage of the calculation can also be broken down to illustrate the number of bedrooms needed with such information specifically recorded by the housing registers... the number of bedrooms required by these households has been assumed to align with the requirements of those already on the housing register in each area, excluding transfer tenants. This is considered to provide a robust if illustrative basis for estimating needs, in the absence of sufficiently comprehensive data'.

3.17 The following section of this guidance, Section 4, explains how the housing register and linked allocation policies actually operate. It explains that families who are not existing council tenants are registered only as eligible for flats. Subsequently, those families have to register for a transfer in order to access houses. So, if transfer applicants are excluded from an assessment of the affordable housing requirements, this will understate to a substantial level the need for houses. Also, a significant proportion of applicants on Brentwood's register seeking small dwellings, particularly one-bedroom dwellings, are older households. Often those households are seeking bungalows or sheltered housing. They skew the housing requirement very considerably. ARK's clear impression is that Turley has not appreciated the factors outlined above and has therefore grossly overestimated the proportion of the affordable housing requirement which should be met by one-bedroom dwellings.

# 4 HOUSING REGISTER - EXPRESSED DEMAND

## **REGISTER POSITION AT NOVEMBER 2024**

4.1 Based on our investigation and assessment, the South Essex HNA arrived at a suggested distribution of new affordable homes in Brentwood without a clear analysis of locally generated needs data in Brentwood. ARK has sought to 'plug this gap' in the assessment methodology by first analysing the local housing register.



- 4.2 The Council classifies applicants on its housing register as either 'Homeseekers' or 'Transfers'. Homeseekers are applicants not currently living in housing owned and managed by the Council and Transfers are those who are resident in council housing and who are seeking to move to more suitable housing.
- 4.3 An important policy backdrop to recognise when analysing the housing register in Brentwood is that Homeseekers are only eligible for flatted accommodation whereas Transfer applicants are also eligible for houses as well as flats. Therefore, for families seeking a house who are not currently council tenants, they are expected to spend time living in a flat before being able to transfer to a house. This policy curtails Homeseeker demand for houses and also drives a relatively high level of transfer applications.
- 4.4 As at November 2024, there were 247 Homeseeker households registered for accommodation and 264 Transfer households.
- 4.5 34% of Homeseeker households seeking one bedroom accommodation and 49% of Transfer households were headed by an applicant aged 60 or over. So, a very significant proportion of local demand for one bedroom accommodation is being generated by older people. Indeed, 36% of Transfers for one beds are applicants seeking bungalow accommodation (which is in very short supply).
- 4.6 If we subtract older applicants from the households registered, 47% of Homeseekers and 13% of Transfers require 1 bed accommodation and combined this is **28%** of all applicants.
- 4.7 Of Transfer applicants, 74% of those looking for a flat are actually seeking a 2 bedroom rather than a 1 bedroom flat. 2 bed flats are typically a more popular and desirable 'downsizing' option for households living in houses but looking to move.
- 4.8 Because turnover rates for smaller accommodation, especially onebedroom flats, tend to be higher than for houses, it is informative to consider how long applicants typically have to wait on the register for an offer of suitable housing. For applicants seeking one-bedroom general needs housing the average wait is 32 months. For a two-bedroom flat it is a similar wait, at 28 months. For a two or three bedroom house the average wait is 48 months.
- 4.9 To emphasise the higher incidence of vacancies among existing flatted stock, an average of 57% of all relets in Brentwood in the past three years was for 1 or 2 bedroom flats whereas the average incidence of relets for houses of all types was 18%.



4.10 The scarcity of houses available for social letting is generally exacerbated by the cumulative impacts of Right to Buy. Unsurprisingly, tenants of houses have been much more inclined to buy their council homes than tenants of flats and this steepens the imbalance in the local stock. The unsubstantiated projection for the distribution of new social housing provision in the South Essex HNA (in favour of 1 bedroom flats) would amplify considerably the existing problem of the relative scarcity of houses and of accommodation suited to families.

**TEMPORARY ACCOMMODATION** 

- 4.11 A review of temporary accommodation data for Brentwood illustrates that there are around 25 households accommodated in temporary accommodation at any one time and around 73% of those households contain children (some of those households will typically be overoccupying their temporary accommodation). The average wait by dwelling type for rehousing for those households is as follows:
  - 1 Bedroom: 224 days
  - 2 Bedroom: 184 days
  - 3 Bedroom: 353 days

(figures from 2021 onwards)

4.12 This demonstrates clearly that households who require larger family accommodation are having to wait longer.

# 5 DELIVERY CHALLENGES

- 5.1 The delivery challenges, in recent years, associated with high density flatted dwellings are widely recognised in the affordable housing sector. The consultation with stakeholders in Brentwood, undertaken recently, provides qualitative information on experience at a local level. The main issues centre around:
  - Highly flatted developments, particularly when poorly designed, are problematic to manage for Registered Providers (RPs).
  - Concerns around fire safety and managing the safety of residents in the event of a fire, particularly as some residents are likely to be vulnerable.
  - If the homes are not spread across the development and blended in with the market homes, with a mix of dwellings more reflective of the overall development, the affordable homes are easily identifiable and therefore the development is not truly 'tenure blind'. This is contrary to the objective of creating sustainable and balanced communities.



- Service charge costs are a cause for concern particularly in mixed blocks as this leads to problems with affordability for residents.
- Smaller homes, particularly one beds and smaller two beds, are not seen as homes for life and people's circumstances change, meaning that they need to move again.
- 5.2 ARK advises a considerable number of local authorities and affordable housing providers on new homes provision, on the operation of local housing markets and on the application of affordable housing planning policies including reviewing planning obligations.
- 5.3 The delivery challenges associated with flats and especially small flats are widespread across the housing sector and have become very pronounced in recent years.
- 5.4 In 2022, ARK was commissioned by Harborough Council on behalf of all local authorities in Leicestershire to investigate the dearth of small flats being produced in both affordable and market tenures. As part of that assignment, we undertook extensive comparative analysis of the experience in many other parts of England, to help understand how widespread the problem appeared to be.
- 5.5 The Leicestershire authorities, and many others we spoke to, were concerned that the balance of new homes in their areas, especially affordable homes, did not respond effectively to recognised housing need because both developers and affordable housing providers chose not to want to provide or acquire small flats.
- 5.6 The evidence for under-provision emerging from our study was stark and we explored with the Leicestershire authorities what actions they could take to help improve the balance of new supply.
- 5.7 Affordable housing providers, especially RPs, confirmed their caution about the implications for them of managing flatted developments and especially schemes with higher concentrations of one-bedroom flats. Service charges, housing management problems and fire safety implications were all prominent considerations.
- 5.8 Well thought-out and carefully designed high density developments can be attractive to RPs. Affordable homes need to be distributed appropriately though and not highly concentrated in just a few areas. Locating the affordable homes in one or two dwelling types and in high concentrations is not viewed as desirable or acceptable. This approach can lead to a reluctance by RPs to acquire the homes and to the developer then seeking to convert the on-site provision of affordable housing to a commuted sum.



- 5.9 In ARK's experience, many developers and housebuilders are actually reluctant to develop high concentrations of flats. Where we do see evidence of this type of development being assertively promoted by developers for affordable housing, we recognise that this can be motivated by minimising the development 'footprint' of affordable homes on sites otherwise occupied by market housing and potentially also because developers know they will be unable to interest RPs in the on-site affordable housing obligation and can then argue for meeting their planning obligations via a commuted sum.
- 5.10 Some planning authorities recognise that creating conditions which favour developers arguing for meeting their affordable housing planning obligations by paying commuted sums is highly beneficial to those developers, allowing a major increase in profitable market housing on a site. Those authorities therefore calculate the commuted sum based on a proportion of affordable housing recognising the increase in market homes. This approach can incentivise developers to work constructively with the planning authority to design the affordable housing proposal to ensure it is delivered on site.

## 6 ACCESSIBILITY OF HOMES

6.1 Local Plan Policy HP01 is clear on the requirements for accessible and adaptable homes and should be referred to in order to clearly understand the Council's requirements. The policy reflects good practice, expects M4(3) units to be spread throughout schemes and dwelling types and is an appropriate response to recognised need for accessible homes. In addition, the Council's preference, where practical, is for all affordable M4(3) units to be located at ground floor level. This is based on feedback from RPs and their experience of managing this type of accommodation.

# 7 LOCAL CONSULTATION

- 7.1 Consultation has taken place as part of formulating this planning practice guidance with RPs which are active in Brentwood borough and also with the Council's Housing and Planning teams.
- 7.2 The outcomes of the consultation support the understanding of local housing need emerging from ARK's analysis and also recognise the delivery and placemaking challenges associated with the very high level of one bedroom accommodation suggested by the Turley HNA. The following information summarises the relevant consultation feedback:



### **BRENTWOOD HOUSING**

- There is a pressing need for larger accommodation for families.
- Families are having to wait much longer than other household types for accommodation.
- The 1 bed flats in particular that are coming through the planning system are not meeting housing need on the ground.
- The long wait for suitable accommodation is leaving families with children in unsatisfactory housing conditions (including temporary accommodation) with overcrowding a problem.
- Affordability is challenging in some flatted accommodation due to high service charge costs.
- M4(3) dwellings need to be distributed throughout new schemes and across the range of dwelling sizes provided.

#### **BRENTWOOD PLANNING**

- When considering planning applications, more localised housing need data would be extremely helpful.
- Greater clarity is needed to ensure the right type of affordable homes are being provided.
- As a result of the number of affordable flats, some developments are not tenure blind nor creating mixed communities. Much of the affordable housing is flatted, whilst the majority of the private dwellings are provided as houses. It also makes implementing clustering of affordable homes across developments difficult. This does not align with policy.
- Early engagement with RPs is beneficial to provide views on design and management of the proposed affordable homes.

#### **REGISTERED PROVIDERS**

- A large number of 1 bedroom properties can lead to significant management problems (detailed in the previous section).
- Poor design in high density developments contributes to problems with anti-social behaviour and dissatisfaction from residents.
- Brentwood does seem to have a higher number of 1 and 2 bedroom flats than other similar districts delivered through S106 agreements.
- A mix of houses and flats, with smaller clusters of flats, is preferred other than in Brentwood town centre.



# 8 SUSTAINABLE MIXED COMMUNITIES

- 8.1 As mentioned earlier in this guidance, in Section 2.4, Brentwood's Local Plan is very clear about the importance the Council places on achieving an appropriate mix of new homes. Policy HP01: Housing Mix 2 states that 'the Council will require: a) an appropriate mix of dwelling types, sizes and tenures to meet the identified housing needs in the borough as set out in in the Council's most up to date housing need evidence to provide choice, and contribute towards the creation of sustainable, balanced and inclusive communities.'
- 8.2 The Council's Planning Obligations Supplementary Planning Document also notes 'the requirement to create inclusive and mixed communities.'
- 8.3 This guidance also highlighted in Section 2.2 earlier the NPPF expectation in Section 8b) 'to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided...'
- 8.4 The principles of the desirability of achieving mixed and balanced communities through the diversity of housing on offer are well established and are at the heart of the role of both the planning system and of local authorities' role as the strategic housing authority for their areas.
- 8.5 In applying these principles in the Brentwood locality, the Council have produced other documents which emphasise the importance of securing a well designed mix of dwellings (and other property/land uses) which contribute to achieving a sustainable community. A good example is the Dunton Hills Garden Village Supplementary Planning Document of January 2023.
- 8.6 Striving for more mixed communities is a long-standing goal of Government, housing providers and the housing sector more generally. A study undertaken by the London School of Economics in 2010 on behalf of what was then the Department for Communities and Local Government made some very telling recommendations on housing mix. The mixed communities initiative linked to this study tended to focus on more deprived communities but the observations it made have wide application. 'There is substantial evidence that areas with more mixed social composition tend to be more popular, more satisfactory to live in, and have better services than poorer areas.'
- 8.7 A major concern for housing and planning professionals over recent years has been the tendency for some larger new developments to polarise occupiers of social housing from their neighbouring market housing occupiers. A number of high-profile flatted schemes in areas of central London for example have entrances in some blocks for affordable housing tenants separate from the main entrance for other residents. Obviously this reinforces difference and can stigmatise affordable housing residents.



- 8.8 Approaching the design of new housing in Brentwood on the basis that market housing occupants will be living in 3, 4 and 5 bedroom houses and affordable housing occupants will be living in concentrations of small one bedroom flats (there have been applications in Brentwood following exactly these design principles) is not a recipe for a sustainable mixed community. The inappropriate conclusions on housing mix reached in the Turley HNA contribute to this polarising approach to providing new homes.
- 8.9 The Council is committed to achieving its stated policy aim of creating sustainable, balanced and inclusive communities and will resist attempts by applicants to create new housing schemes which 'pigeon-hole' affordable housing residents in concentrations of small flats and fail to deliver reasonable and appropriate housing choice.

# 9 PREFERRED APPROACH

- 9.1 As a starting point for reasonable expectations on dwelling mix for new affordable housing, the Council will expect delivery in line with its adopted Local Plan policy. The key consideration for the Council will remain the Policy HP01 expectation that the types of new homes should contribute towards the creation of sustainable, balanced and inclusive communities.
- 9.2 The ARK analysis outlined in this practice guidance identifies the shortcomings in the affordable housing mix requirement emerging from the 2022 HNA for South Essex completed by Turley Associates. Therefore, the Council's policy expectations remain founded primarily on the results of the 2016 SHMA, at least as a baseline for expectations. That mix requirement is included in the main table in section 3.4 of this practice guidance and repeated below for convenience:

Tenure	% Split	Indicative Size					
		One bedroom	Two bedrooms	Three bedrooms	Four/+ bedrooms	Total Size	
Affordable rent / Social rent	86%	31%	24%	19%	26%	100%	
Other forms of affordable housing	14%	28%	36%	24%	12%	100%	
Total Tenure	100%			1			



- 9.3 There are other salient considerations for the Council when agreeing an appropriate affordable housing dwelling mix with applicants on specific sites and these have been explored carefully in this document. They include more recent data extracted from the Council's housing register, feedback from knowledgeable housing practitioners, known delivery challenges in relation to concentrations of small flats and wider place-making and sustainability considerations for larger developments.
- 9.4 Conclusions from housing register analysis and qualitative feedback suggest that the Council should prioritise the provision of houses for family households as this is a form of affordable housing becoming more scarce and for which applicant households are having to wait the longest, including those living in temporary accommodation.
- 9.5 The Council also recognises that a significant proportion of its known affordable housing need for one and two bedroom dwellings is actually among older households. The preferred accommodation types to respond to this need group are bungalows and specialist retirement housing and the Council will also prioritise trying to improve the proportion of new affordable housing supply of these types.
- 9.6 For larger new development schemes and especially those on strategic sites, the Council recognises the crucial importance of creating sustainable communities with a mix of dwellings (and tenures) which supports a balance of household types. These sites are often in suburban or garden village settings. It is not in the interests of good quality placemaking for there to be large concentrations of small affordable housing flats in these settings and the Council will seek to avoid this.
- 9.7 In the same vein of creating or contributing to sustainable communities, the Council will continue to discourage applications which polarise market and affordable housing types, especially those where market housing types tend towards larger houses and affordable housing types are proposed to be mainly one and two bedroom flats. As far as possible, the Council seeks well integrated housing with developments which are 'tenure blind'.
- 9.8 The Council encourages applicants to develop proposals for new housing that respond positively to the principles set out in our policy and in this practice guidance. We welcome the opportunity to work with applicants in the pre-application and application processes to guide the development of housing mix, particularly for affordable homes. Applicants can benefit from input from the Council's Housing team to help inform arriving at an appropriate affordable housing mix.

ARK Consultancy Limited February 2025