

Telford & Wrekin Council
Local Plan 2021 – 2041

September 2025

AFFORDABLE HOUSING TOPIC PAPER



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1.0 INTRODUCTION

- 1.1 The purpose of this paper is to set out the evidence and justification behind the requirements set out in Policy HO4: Affordable Housing Requirement and Policy HO5: Affordable Housing Delivery. These policies are shown below:

Policy HO4

Affordable housing requirements

1. All major residential developments (as defined in national policy) will look to maximise affordable housing delivery and be required to deliver a minimum of:
 - a. 25% affordable homes in the Telford built-up area; and
 - b. 35% affordable homes in Newport and the rural area
2. The council will, as per NPPF requirements, secure a tenure mix across both affordable housing for rent and affordable home ownership tenures. The tenure mix should be identified through discussions with the local authority and informed by the latest Government guidance.
3. Developments providing affordable housing above these targets (up to 100%) will be supported where it meets local housing needs, creates mixed and balanced communities and conforms to other relevant policies within the Local Plan.
4. Developments that do not meet the policy requirements must provide a clear justification supported by a viability assessment.

Policy HO5

Affordable housing delivery

1. The majority of affordable housing is expected to be delivered on-site. However, there are a number of housing needs that cannot readily be met through the provision of general needs affordable housing. This will require off-site contributions in order to positively meet local housing need. Affordable housing will be delivered through:

- a. Provision of a mix of affordable housing sizes and tenures based on local housing needs evidence. The tenure split should prioritise affordable housing for rent.
- b. Affordable housing being sensitively integrated across the site, including each phase of larger sites.
- c. Affordable housing being tenure neutral in its design, materials, compliance with space standards and private amenity space, and parking provision
- d. Off-site affordable housing contributions (with the exception of 100% affordable housing schemes), at a minimum of 10% of the proportion set out in Policy HO4, will be required on the basis that:
 - It contributes towards the delivery of housing outside general needs affordable housing for groups listed in Policy HO3; and/or
 - It is not feasible or practical to deliver on-site affordable housing; or
 - There are other overriding benefits to off-site provision.

2. Affordable housing provided under Part 1 of this policy will be secured through a planning obligation, and:

- e. Will be transferred to a Registered Provider or other body providing affordable housing prior to the completion of all open market housing on-site;
- f. Remain affordable in perpetuity; and
- g. Enable affordable housing to be provided elsewhere in the borough via off-site contributions.

3. Proposals for reduced affordable housing contributions, below the requirements of Policy HO5, will only be considered in exceptional circumstances, including:

- h. Where vacant buildings are being reused or redeveloped and the buildings have not been abandoned, in accordance with the government's vacant building credit; or
- i. Where a viability appraisal has been submitted and agreed by the council, with an appropriate review mechanism as set out in Policy S7.

- 1.2 This Topic Paper commences with a review of national policy and guidance, followed by a review of the affordable housing need evidence. Past trends in affordable housing delivery are then examined, followed by consideration of evidence on viability. The approach to setting the affordable housing policy is then explained, coupled with an explanation of the emerging policy.
- 1.3 The emerging Telford & Wrekin Local Plan has been prepared and will be examined under the National Planning Policy Framework (NPPF) published in December 2024.
- 1.4 This topic paper has been written to support the submission of the Local Plan for examination and relates to the Regulation 19 version of emerging Local Plan.
- 1.5 The main evidence base documents discussed in this paper are the Whole Plan Viability Assessment (June 2023), the Whole Plan Viability Assessment Update Note (December 2024) referred to as the WPVA 2023 and WPVA 2024), the Housing Mix

and Affordable Housing Update (October 2023) and the Economic and Housing Development Needs Assessment (EHDNA) (October 2020 and update published February 2025).

- 1.6 These documents provide recently prepared, comprehensive and robust evidence sources that are drawn on at various points throughout the paper.

2.0 NATIONAL PLANNING POLICY

2.1 The NPPF outlines that strategic policies, such as emerging Policy HO4 and HO5, should make sufficient provision for housing including affordable housing (Paragraph 20).

2.2 The NPPF defines affordable housing as per the below:

“Affordable housing: Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Social Rent: meets all of the following conditions: (a) the rent is set in accordance with the government’s rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

b) Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the government’s rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

(c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

(d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to government or the relevant authority specified in the funding agreement.”

(Annex 2: NPPF)

2.3 Paragraph 63 of the NPPF provides further guidance, confirming that the need, size, type and tenure of affordable housing should be assessed and reflected in planning policies.

2.4 The PPG defines households whose needs are not met by the market and who are eligible for one of more types of affordable housing are deemed to be in affordable housing need (005 ID: 76-005-20190722).

2.5 Within the PPG (006 ID: 67-006-20190722) it also states that strategic policy-making authorities will need to estimate their current affordable housing need and that they should do so by working with colleagues in other departments such as housing and

health and social care.

- 2.6 In regard to affordable housing policy drafting guidance, paragraph 64-66 of the NPPF provides further direction, stating that the following in Paragraph 64:

“Where a need for affordable housing is identified, planning policies should specify the type of affordable housing 29 required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:

a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and

b) the agreed approach contributes to the objective of creating mixed and balanced communities.”

- 2.7 Paragraph 65 states that affordable housing should not be sought on residential developments that are not major developments other than in designated rural areas.
- 2.8 Footnote 35 of the NPPF references the Affordable Homes Update Written Ministerial Statement (WMS) published on 24 May 2021. It confirms that the minimum 25% First Homes no longer applied.
- 2.9 In regard to development contributions, guidance regarding viability is given. Here paragraph 35 of the NPPF outlines that Plans should set out the contributions expected including affordable housing provision. These policies should not undermine the deliverability of the Plan.

3.0 AFFORDABLE HOUSING NEED EVIDENCE

- 3.1 In order to prepare the affordable housing policy, the first step was the preparation of evidence relating to affordable housing need. This evidence is set out in the EHDNA (2020) and the latest EHDNA Update (February 2025).
- 3.2 The EHDNA Update identifies future housing growth needs across the Telford & Wrekin for the period 2023 to 2040. This update also includes the application of the new Standard Method calculation following the publication of the NPPF (December 2024).
- 3.3 Within the EHDNA Update (February 2025) it confirms that there are a total 1,208 households in need. This figure includes 416 homeless households, 90 lettings to reasonable preference categories, 438 overcrowded households and 264 concealed households.
- 3.4 When adding the number of newly forming households who are unable to afford lower quartile rents (787) to the number of existing households falling into need (338) this produces an estimated gross figure of 1,125 households per year falling into need over the emerging Plan period.
- 3.5 Therefore, there is an identified need of 824 affordable homes per year up until the end of the Plan period.

Need for social / affordable rented housing

- 3.6 The split between the need for social and affordable rent is considered in the EHDNA Update (2025).
- 3.7 Social rent is the cheapest form of affordable housing followed by affordable housing rent. Both of these forms of rent are significantly cheaper than market rent.
- 3.8 The EHDNA Update (2025) notes that in regard to future need it is estimated that 47% of households cannot afford to rent in the open market. When taken into account alongside the current annual quota of need being 71 dwellings per annum (dpa), the total newly arising affordable housing need being 1,125 dpa and the total affordable housing supply available each year, this leads to a significant need for social / affordable rented housing.
- 3.9 Therefore, the EHDNA (2025) has assessed that there is a need for 696 social and affordable rented housing units per year across the borough.
- 3.10 The EHDNA (2025) concludes that both social and affordable rented housing are likely to be required. It recommends that, if practicable, 66% social rent and 34% affordable rent is provided. However, it is acknowledged that the tenure split will need to be reconciled against the need, the viability of the development and the latest national planning policy guidance.

Need for affordable home ownership products

- 3.11 The EHDNA 2025 update assesses the current and projected need for affordable home ownership. To purchase an entry-level (lower quartile) property at a price of £160,000, an income of £38,860 is required when a loan to income ratio of 3.5 and mortgage deposit of 15% is assumed.
- 3.12 Analysis undertaken shows that the current number of households currently in need of affordable home ownership is 49 per year, with the number of additional households seeking to become a homeowner but are unable to afford on the open market being 92 per year. This, when combined with the current backlog of need, suggests a gross

affordable home ownership need figure of 142 per year. There is also estimated to be 14 dpa of committed supply in Telford & Wrekin.

- 3.13 Therefore, the EHDNA (2025) has assessed that there is a need for 128 affordable home ownership properties per year.

4.0 PAST TRENDS IN AFFORDABLE HOUSING DELIVERY

- 4.1 This section reviews the Council's track record of affordable housing delivery.
- 4.2 The Council's annual monitoring report data (AMR) shows housing and affordable housing delivery since 2007. Data from the more recent years are shown in Table 1 and Table 2 below. Table 1 shows the number of completions out of gross completions and Table 2 shows the tenure mix of affordable housing delivered.

Affordable housing completions

- 4.3 The table below shows the percentage of affordable housing completions¹ in comparison to overall housing completions over the last ten years.

¹ Affordable housing completions are defined as a completed property which is transferred to a registered provider and properties which are sold at a discounted rate (e.g. shared ownership properties).

Year		2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Totals	5yr Average	10yr Average
		Net Housing Completions													
Area	Telford	795	947	1025	943	803	1152	944	684	1106	1308	1022	10729	1013	975
	Newport	39	87	166	168	179	122	5	34	167	227	67	1261	100	115
	Rural	8	40	64	37	85	71	42	99	200	197	206	1049	149	95
	Borough Total	842	1074	1255	1148	1067	1345	991	817	1473	1732	1295	13039	1262	1185
Affordable Housing Total ²		319	427	343	301	290	322	293	222	397	368	265	3547	309	322
Percentage of AH out of Completions		38%	40%	27%	26%	27%	24%	30%	27%	27%	21%	20%	27%	25%	28%

Table 1: Housing completions 2013/14 – 2023/24

² The affordable housing completions include units delivered through Homes England grant as well as Section 106 contributions.

- 4.4 This shows that over the last ten-years 25% of homes completed have been affordable dwellings. Obviously, the inclusion of schemes providing 100% affordable housing are increasing the average percentage, but nonetheless delivery rates are strong.
- 4.5 During this period, Policies HO5: Affordable Housing Thresholds and Percentages and HO6: Delivery of Affordable Housing, of the adopted Telford & Wrekin Local Plan 2011 – 2031 (adopted January 2018) were applicable. Here Policy HO5 states the following:

“Affordable housing thresholds and percentages

Residential developments shall contribute towards meeting the affordable housing needs of the borough where proposals comprise 11 dwellings or more, or where gross floorspace is greater than 1,000 square metres.

To ensure that new residential development sites (including mixed use schemes containing residential development) provide for the range of housing needs identified and create a balance of tenures, the Council will apply the following percentages:

- i. 25% to be applied to Telford; and*
- ii. 35% to be applied to Newport and in any other location, including the rural area*

Schemes that seek to deliver a higher percentage may be appropriate, depending on individual site circumstances, subject to other relevant policies in the Local Plan.”

- 4.6 These are the same affordable housing percentages that are in the emerging Local Plan Policy HO4.
- 4.7 As illustrated in the figure below, there has been a relatively strong historical delivery of affordable housing since 2011. It is apparent that in 2020 low levels of delivery were recorded, however that is most likely a result of economic downturn following the Covid-19 pandemic.

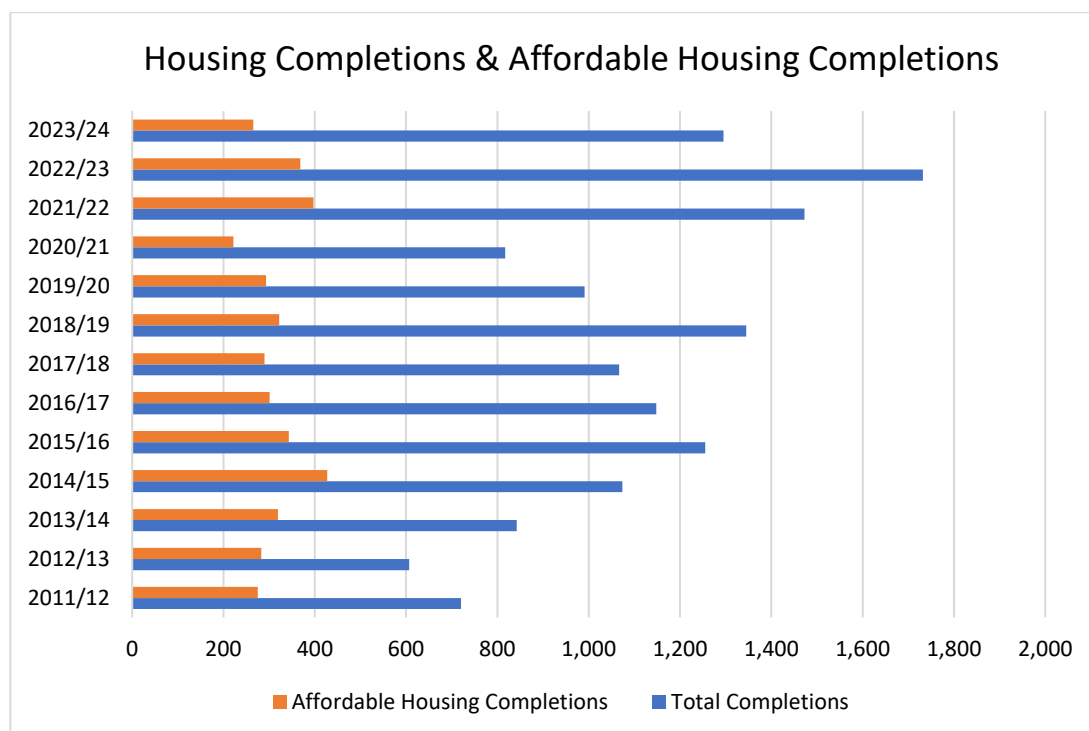


Figure 1: Housing Completions and Affordable Housing Completions

Affordable housing tenure

- 4.8 The table below shows the different tenures within the affordable housing which has been delivered in the borough.

Year	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total	5yr Average	7yr Average
Social Rent Homes Provided	30	115	31	20	27	0	20	243	19.6	35
	12%	36%	11%	9%	7%	0%	8%	11%	7%	12%
Intermediate/ Shared Homes Provided	39	59	86	46	89	41	58	418	64	60
	16%	18%	29%	21%	22%	11%	22%	20%	21%	20%
Affordable Rent Provided	178	148	176	156	281	327	187	1453	225.4	208
	72%	46%	60%	70%	71%	89%	71%	69%	72%	68%
Total Affordable	247	322	293	222	397	368	265	2114	309	302

Table 2: Affordable housing completions by tenure

- 4.9 As shown in Table 2, out of the affordable housing tenures, the majority of affordable housing delivered in Telford & Wrekin since 2017 has been affordable rent, with social rent providing the lowest proportion. This explains why the EHDNA outlines the higher need for social rent given delivery rates of this tenure have been lower.
- 4.10 In terms of affordable home ownership, this equates to 15.5% of total need in borough. In the EDHNA it is illustrated that affordable home ownership resales are, on average, 7 per year coupled with a committed supply of 7 dwellings. This is also illustrative of intermediate and shared ownership properties equating to 21% of the affordable housing supply over the last five years tenure wise.

Examples of schemes providing affordable housing

- 4.11 Numerous schemes providing affordable housing have been delivered to date. The Council has an excellent track record of achieving policy-compliant development with regards to affordable housing.
- 4.12 This has been achieved by working proactively with Homes England, developers and registered providers.
- 4.13 For example, the Council entered a 10-year Land Deal with Homes England³. This Deal cumulatively delivered 25 residential sites and 34 commercial sites, achieving a gross sales income of £60.3m to date.
- 4.14 Furthermore, as evidenced within the AMRs, since 2011 on average 310 dpa have been transferred to Registered Housing Providers. This number includes sites where a S106 contribution was sought, where Homes England grant was secured and where affordable dwellings have been built on site.

³ [Agenda item - Telford Land Deal Update - Telford & Wrekin Council](#)

5.0 VIABILITY EVIDENCE

- 5.1 In this section the results of the WPVA 2023 and 2024 are discussed in the context of its implications for the affordable housing policies.
- 5.2 The WPVA 2023 appraises the impact of policy requirements from both a local and national level, including Building Regulations, on development viability. This study uses a methodology consistent with the NPPF, taking a typology-based approach to preparing financial development appraisals (taking into account build costs, sales values and land values).
- 5.3 The WPVA 2023 and 2024 update note follow a methodology consistent with the NPPF.
- 5.4 Average house prices in Telford & Wrekin are lower than those in the West Midlands and across England & Wales, with land registry data showing the average house price is £237,295 compared to a national average of £303,769. It also shows that since April 2023 to September 2024 house prices in Telford & Wrekin rose 6% which was 2% more than those seen nationally. For Telford & Wrekin this increase was predominantly seen in the newbuild sales arena which rose by 20% (c £58,000).
- 5.5 The following typologies have been assessed including greenfield and brownfield sites. These have been broken down into different scale typologies. This has resulted in 30 different typologies overall.
- 5.6 Various affordable housing thresholds, which means the percentage of affordable housing being delivered on site, have been tested (0 – 40%) in light of the latest economic circumstances and build costs to provide an up-to-date assessment of viability.
- 5.7 The WPVA (2024) recommends a target affordable housing threshold of 20% in Telford and 35% elsewhere. This recommended threshold is slightly inconsistent with the high need for affordable rented accommodation within the authority. It is also at odds with the strong track record of a blended approach of Homes England grant along with S106 being used to secure the delivery of affordable housing in the authority. Therefore, the emerging policy HO4 therefore sets a target affordable housing threshold of 25% in Telford built-up area and 35% in Newport and the rural area.
- 5.8 It is considered that the emerging policy thresholds are still deliverable, particularly given the WPVA (2023) included First Homes in the scenarios. Given the requirement to deliver First Homes has now been removed following changes in national policy, we consider that the emerging policy target is viable and will help to maximise delivery of much needed affordable housing within the authority.
- 5.9 However, the WPVA (2023 and 2024) does not take into account potential grant funding for affordable housing – it only reviews the viability of S106 affordable homes. Despite this, the Council has a long history of joint working with public sector bodies such as Homes England to deliver affordable housing, as shown in the table below.

Year	Total New Affordable Housing Completions	Delivered by S106 Agreement	%	Delivered by Homes England Grant	%
2015/16	343	133	39%	210	61%
2016/17	296	135	46%	161	54%
2017/18	348	58	17%	290	83%
2018/19	322	140	43%	182	57%
2019/20	293	157	54%	136	46%
2020/21	222	112	50%	110	50%
2021/22	397	168	42%	229	58%
2022/23	368	36	10%	332	90%
2023/24	265	214	81%	51	19%
TOTAL	1,602	623	39%	979	61%

Table 3: Percentage of affordable homes delivered via S106 / Homes England Grant

- 5.10 This is recognised in the WPVA (2023), as it is explained that over the last seven years about 60% of all affordable housing has been delivered through some form of Council or Homes England funding. This is particularly relevant in and around Telford due to the extent of public sector ownership there. Furthermore, a significant number of the brownfield sites are in the Council's control and there is a strong track record of securing 'gap funding'.

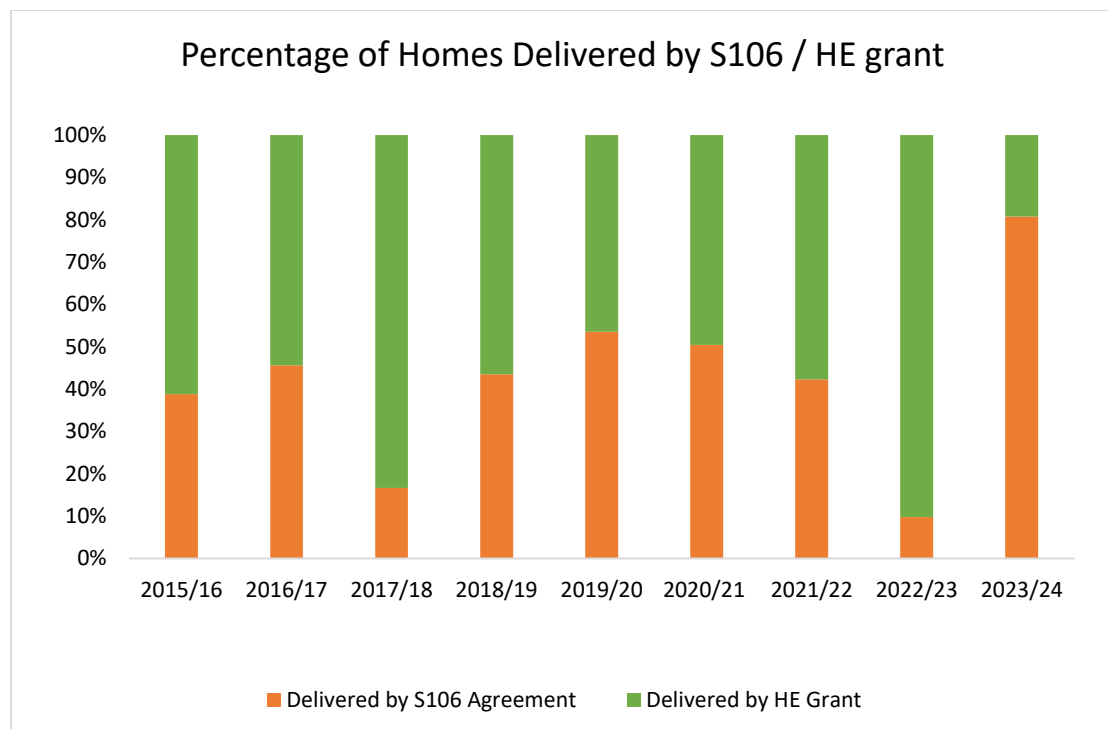


Figure 2: Percentage of Affordable Homes Delivered by S106 or Homes England Grant

- 5.11 Given the majority of affordable housing is delivered via Homes England grant as opposed to S106 agreements, the Council is confident that there is sufficient evidence to support the affordable housing policy target of 25% for Telford and 35% for Newport as set out in Policy HO4. The Council consider this to be a viable and justified policy requirement and that Homes England grant funding should be considered as a

legitimate source of supply to meet future need. This also provides further justification for 10% of the affordable housing contribution to be delivered off-site through commuted sum payments.

- 5.12 This approach to secure affordable housing provision via commuted sums is not uncommon with local authorities such as Manchester City Council doing as such. The purpose of securing offsite commuted sums is to address the affordable housing needs arising in the groups set out in paragraph 6.12.
- 5.13 The emerging Local Plan also supports the delivery of 100% affordable housing schemes which the Council actively seek to secure through working in partnership with registered providers. These schemes are often supported by Homes England grant and are therefore legitimately considered to contribute towards the Council's affordable housing supply.
- 5.14 Furthermore, the results shown in the WPVA (2023 and 2024) are only one of a number of factors the Council have considered in setting the affordable housing policy requirements in Policy HO4 and HO5. The results of the appraisals themselves do not determine the deliverability of development. Therefore, it is important to consider the evidence presented within this topic paper which outlines the significant need for new affordable homes in the borough and the Council's successful track record of securing Homes England grant and high delivery rates of affordable housing.
- 5.15 Thus, in light of this context, it is supported that Policy HO4 is modified, for the purposes of providing clarity, as per the below:

Policy HO4

Affordable housing requirements

1. All major residential developments (as defined in national policy) will look to maximise affordable housing delivery and be required to deliver a minimum of:

- a. 25% affordable homes in the Telford built-up area; and
- b. 35% affordable homes in Newport and the rural area

2. The council will, as per NPPF requirements, secure a tenure mix across both affordable housing for rent and affordable home ownership tenures. The tenure mix should be identified through discussions with the local authority and informed by the latest Government guidance.

3. Developments providing affordable housing above these targets (up to 100%) will be supported where it meets local housing needs, creates mixed and balanced communities and conforms to other relevant policies within the Local Plan.

4. Developments that do not meet the policy requirements must provide a clear justification supported by a viability assessment.

5. In instances where it is not possible to secure the full percentage of affordable homes via a planning obligation, developers are required to demonstrate that they have investigated other sources of supply, for example provision through Homes England grant, to reach the thresholds set out above.

6.0 SETTING THE AFFORDABLE HOUSING REQUIREMENT

- 6.1 This section looks at how the Council has approached writing emerging policies HO4 and HO5 by taking into account the evidence within the EHDNA, the overall housing need and the emerging housing target.
- 6.2 The EHDNA Update identifies a need for 696 affordable rented dwellings and 128 affordable ownership properties per year.
- 6.3 The Housing Topic Paper provides guidance as to how the Council has set the overall housing requirement. The emerging housing requirement in the Local Plan is set to be 1,034 dpa between 2021-41⁴. This includes a 153 dpa contribution towards the Black Country Authorities' unmet housing need. Given the affordable housing need for Telford & Wrekin is 824 dpa, this shows that whatever percentage requirement for affordable housing is set, there will be substantial deficit of affordable housing provision compared to housing need. However, this is not an uncommon problem for a Local Plan to encounter.
- 6.4 Past trends of affordable housing delivery has been shown to be strong in the borough, whilst the findings of the WPVA (2023 and 2024) have been discussed and presented.
- 6.5 This policy position, within Policy HO4, is argued to be viable and evidence based, as despite the WPVA (2024) recommending 20% affordable housing in Telford and 30% elsewhere, the policy target set of 25% for Telford and 35% for Newport and the rural area is more appropriate given the WPVA (2024) has not taken into account the significant track record of delivering properties via Homes England grant funding.
- 6.6 Furthermore, the approach to the affordable housing percentage is justified (Policy HO4). It is recognised that the least affordable area within the borough is Newport and the rural area and so the higher threshold makes sense. Whereas Telford and the built-up area, comparatively, have a higher percentage of existing affordable housing stock and so this is reflected in the lower percentage (25%).
- 6.7 It is also clear that Policy HO4 sets to maximise affordable housing delivery across the borough by providing support for 100% affordable housing schemes.
- 6.8 Policy HO5 provides clarity on the position regarding commuted sums. This is not an unusual approach taken and instead is an approach undertaken by other Local Authorities too such as the Chesterfield Local Plan (2020) detailed within Policy CLP4 'Range of Housing'. Here Policy CLP4 states that where it is not possible or appropriate to deliver affordable housing on site a financial contribution will be sought for off-site provision. Furthermore, if a scheme requires a 'part' unit to be provided as affordable (such as 2.75 affordable dwellings), the Council will aim to ensure 2 dwellings are delivered on site and the 0.75 fraction is delivered as an off-site contribution. This consolidation of developer contributions can then be deployed to meet the borough wide affordable housing needs for a range of more bespoke needs that are not met through general needs affordable provision.
- 6.9 Section (a) of Policy HO5 is supported by the housing mix evidence in the EHDNA Update, requiring the majority of affordable housing to be affordable rent. It is also supported by the EHDNA Update recommendation that a flexible approach is taken so that the site-by-site deliverability and viability can be assessed.
- 6.10 In the supporting text of these policies 'pepper-potting' is also recommended. This is in line with best practice for creating mixed communities. Here pepper-potting refers

⁴ The Regulation 19 Plan used a housing figure of 1,010dpa but this has been revised prior to submission to account for the updated standard method.

to scattering affordable units throughout the new developments to enhance social integration.

Affordable housing needs in the borough that are not met by general needs housing developments

- 6.11 The Council recognise that local housing need is not always readily met through general needs affordable housing this includes the needs of residents identified in the Housing Strategy, Specialist and Supported Accommodation Strategy, Empty Homes Strategy and Telford & Wrekin Council and the Economic and Housing Development Needs Assessment.
- 6.12 Therefore, the Council will take a more proactive approach to securing offsite financial contributions, as set out in Policy HO5, in order to deliver:
- Supported and specialist housing for older and vulnerable people,
 - Care leavers,
 - Temporary accommodation for the homeless,
 - Bringing empty homes back into use as affordable housing,
 - Rural affordable accommodation enabling people to remain within their local community,
 - Affordable accommodation for the gypsy and traveller community.
- 6.13 This proactive approach will take a 'worst first' strategy prioritising bringing back into use properties with the most pressing condition. It shall also always try to make the best use of existing accommodation to help meet the need, coupled with supporting the development of new build specialist and supported accommodation. This is covered in Section (d) of Policy HO5, examples of the types of schemes to be delivered via this route include:
- Octavia Court – Refurbishing and repurposing an existing Council owned facility to create 11 units of self-contained supported living accommodation for young care leavers
 - Lion House – Redevelopment of a derelict public house and grounds that was a blight on the local community. This development will provide 11 bespoke units of social rent supported living accommodation for adults with learning disabilities.
 - Maurice Lee Avenue – Conversion of a pair of empty semi-detached houses into 8 units of social rent and affordable temporary accommodation.
 - Lakewood Court – Conversion of a Residential Home into 16 units of bespoke social rent supported living accommodation for adults with learning disabilities.
 - Farcroft – redevelopment of obsolete former residential care home site to provide 27 units of social rent and affordable high needs dementia care accommodation for older persons.
- 6.14 Telford and Wrekin Council have directly invested to develop the above schemes, enabling further grant funding from Homes England where applicable.
- 6.15 The Council will further invest to meet unmet demand for specialist and supported affordable and social rent housing where the market is not able or unwilling to respond. This includes;

- Fully accessible and adapted supported accommodation for residents with an acquired brain injury.
- Fully Accessible and adapted properties for adults with physical disabilities.
- Fully Accessible and adapted properties for children with physical disabilities.
- Fully Accessible and adapted properties for adults who are bariatric.
- Supported accommodation for care leavers and vulnerable young people.
- Supported accommodation for young people transitioning to independent living.
- High needs extra care schemes for older persons
- Specialist accommodation for dementia care.
- Properties reserved for protected or vulnerable groups such as veterans or care leavers let at a social rent.

6.16 The Council's investment will also seek to deliver general needs affordable housing where the market is unable or unwilling to specific property types, including;

- 1 bed houses
- 1 bed apartments
- 4 bed houses
- 5 bed houses
- 5+ bed houses
- Fully accessible properties of all sizes

7.0 CONCLUSION

- 7.1 The requirements set out in Policy HO4 and Policy HO5 are justified and effective. Here the suggested modification to Policy HO4 helps provide certainty that Homes England grant is a legitimate source of supply. These policies are in accordance with national policy requirements and guidance relating to affordable housing.
- 7.2 A summary of the affordable housing needs has been provided. Within the Economic and Housing Development Needs Assessment (EHDNA), this outlined a need for 696 social/affordable rented homes per annum, and for 128 affordable home ownership homes per annum, with the greatest need being for rented accommodation.
- 7.3 Past trends in affordable housing delivery have been examined, demonstrating that an average of 29% of gross housing completions have been for affordable housing across developments in the borough since 2007.
- 7.4 Viability evidence from the WPVA (2023 and 2024) is summarised, showing that since 2015 60% of affordable housing has been delivered with some form of Homes England or Council input.
- 7.5 The level of affordable housing need has been set in context with the overall level of housing need and the housing target. The evidence behind the housing target is discussed separately in the Housing Background Paper.
- 7.6 The emerging policy requirements have been justified, including the 25% affordable housing requirement in the Telford built-up area and 35% affordable housing requirement in Newport and the rural area.