MASTER

LAND & PLANNING

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25 March 2024

T: ███████████
M: ██████████
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Dear Sir / Madam

Test Valley Draft Local Plan 2040 Regulation 18 Stage 2 – February 2024

Master Land & Planning Ltd is instructed by English Rural Housing Association (ERHA), who welcome the opportunity to comment on the Regulation 18 consultation for the Test Valley Draft Local Plan 2040.

These representations are submitted via email and comprise:

- Representations below with cross-references to the appropriate paragraphs and policies; and
- Associated evidence.

Please can our client be kept informed of the progress of the Local Plan.

Yours faithfully

Hollie Sturgess BA(Hons) MSc MRTPI
Senior Planner

Paragraphs 5.380 – 5.386 Rural Exception Affordable Housing – the role of English Rural Housing Association

English Rural Housing Association (ERHA) are a non-profit organisation that have been providing affordable housing to rural communities in England since the early 1990s. ERHA works in partnership with those communities, parish councils, landowners and local authorities to deliver a unified approach, and aims to be the foremost specialist provider of rural affordable housing in England to help sustain the economic and social life or rural areas.

Affordability in rural areas is worsening, with high property values, increased aspirations to live in the countryside and limited development of new homes meaning many local households are now unable to find a home they can afford and remain within the rural community where they have grown up or where they work. The absence of affordable homes is a national crisis, exacerbating rural poverty and driving the real and growing problem of rural homelessness. The **'Homelessness in the Countryside: A Hidden Crisis'** (March 2023) report (enclosed) conducted by University of Kent and University of Southampton identify that rural areas receive 65% less funding per capita that urban areas for homelessness prevention resulting in the funding for genuinely affordable housing being highly inadequate and having limited impact in rural areas.

The provision of affordable housing can therefore have a transformative impact on individual lives and communal vitality, being an effective economic stimulus to support communities and rural regions to thrive. Planning policy needs to actively enable the growth and development of rural areas.

Currently owning and managing over 1,500 homes across 130 villages, the mission of ERHA is *"to build and manage affordable housing for local people in rural communities in England and to be an advocate for affordable rural housing".* They seek to build high-quality attractive homes with minimal environmental impact through energy efficient solutions that ensure affordability and local access for generations to come.

ERHA are a trusted partner and registered housing association with a top-tier regulatory grading for Governance (G1) from the Government's Regulator of Social Housing. Their financial stability and status as an Investment Partner with Homes England ensure that resources can be secured to develop affordable housing, catering to a diverse range of needs through affordable rental properties, shared ownership and other discounted sales options.

Most of the affordable houses delivered by ERHA are through rural exception sites. Delivering small scale bespoke developments that are built to meet local needs for local people. However,

there are many challenges to their delivery, of which planning policies is one. The recent paper **'Land, Landowners, and the Delivery of Affordable Homes in Rural Areas'** (September 2023) (enclosed) was completed by University College London in collaboration with ERHA undertakes a 'deep dive' into the use of rural exception sites as a mechanism for delivering new homes in the countryside. The number of new homes built using rural exception sites is a fraction of wider housing delivery and, more crucially, a drop in the ocean when it comes to responding to demonstrable unmet housing needs in rural areas. This is further emphasised by more recent research by University College London '**Factors in the effective delivery of Rural Exception Sites in England'** (February 2024) (enclosed) which found that only a fraction (17%) of rural local planning authorities have made use of Rural Exception Sites to deliver affordable homes between 2021 and 2022. The many challenges of bringing forward new exception sites span a range of issues, including the need for corporate support, national clarity of cross-subsidy, community involvement and funding. However, as outlined in the paper planning policy and the approach of each local planning authority do have significant impacts, and there is a need for Local Plans to *"have spatial development strategies that support RES in lowest tier settlements, in order to advance the future sustainability of England's villages and rural communities."*

ERHA therefore welcomes the opportunity to contribute to your emerging Local Plan so that it sets a proactive and viable framework to encourage rural exception sites to be brought forward at the earliest opportunity.

Policy HOU3 – Rural Exception Affordable Housing

Existing National Policy Context

The NPPF (December 2023) defines rural exception sites as:

> *"Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding."*

A variety of NPPF policies support the delivery of housing to meet specific needs and boost the supply of housing in rural areas, by stating:

> *60. 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 and that land with permission is developed without unnecessary delay.*

> *63. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers 27 , people who rent their homes and people wishing to commission or build their own homes 28).*

> *82. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.*

> *83. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*

The PPG provides further guidance on a range of points, stating:

How can planning policies support sustainable rural communities?

People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities. Strategic policies will need to be informed by an understanding of these needs and opportunities, especially where authorities in designated rural areas wish to demonstrate that it is appropriate to set lower thresholds for affordable housing than those which apply generally.

The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness. A neighbourhood plan can allocate additional sites to those identified in an adopted plan so long as the neighbourhood plan meets the basic conditions.

Local planning authorities can support opportunities to bring forward rural exception sites by working proactively with landowners and potential delivery partners such as parish councils and community land trusts.

Paragraph: 009 Reference ID: 67-009-20190722

Where can rural exception sites come forward?

As set out in the National Planning Policy Framework, rural exception sites can come forward in any rural location. In designated rural areas and areas designated as Green Belt, rural exception sites are the only sort of exception site than can come forward.

Paragraph: 011 Reference ID: 67-011-20210524

What sorts of affordable housing can be delivered on rural exception sites?

Rural exception sites should seek to address the affordable housing needs of local communities. They can be used to deliver any form of affordable housing, including First Homes, provided this is supported by appropriate evidence of local need, such as a local housing needs survey.

Paragraph: 012 Reference ID: 67-012-20210524

Can rural exception sites deliver market housing?

Rural exception sites can deliver a small proportion of market housing, provided that it can be demonstrated that this is necessary in order to ensure the overall viability of the site. Local authorities and neighbourhood planning groups are encouraged to produce policies that specify in further detail the proportions of market housing would be considered acceptable, and under what circumstances.

Other than allowing for market housing, what other ways can the viability of rural exception sites be improved? Where a local authority is satisfied because of the evidence provided that a rural exception site would not be viable if it were required to deliver only affordable housing, they may wish to consider whether alternative approaches to securing site viability could be pursued. This could include (but is not limited to):

- *allowing for flexibility in tenure, size, or type of housing to be provided*

- *allowing for flexibility in the phasing of the development*

- *accepting the provision of a commuted sum to be used for provision of affordable housing on another site or sites*

- *obtaining other sources of funding such as grants*

Plan-making authorities are encouraged to set policies that set out in greater detail the circumstances in which alternative approaches to viability would be considered.

Paragraph: 013 Reference ID: 67-013-20210524

How can land for rural exception sites be identified?

Organisations, local authorities, or individuals seeking to bring forward rural exception sites are encouraged to take a proactive approach to identifying suitable locations for rural exception site delivery through such measures as:

- *actively seeking the details of relevant landowners and approaching them directly, in order to determine their level of interest in putting their sites forward for such developments*

- *working in collaboration with local communities, parish councils and other relevant groups to identify and deliver rural exception sites*

Paragraph: 014 Reference ID: 67-014-20210524

How can rural exception site delivery be encouraged?

Strategies for bringing forward rural exception sites will vary depending on local circumstances. However, where local authorities are keen to increase the number of rural exception sites that can come forward in their areas, or developers or landowners have site(s) that they wish to pursue, they may wish to consider establishing or strengthening working relationships with relevant groups including (but not limited to):

- *parish and town councils*

- *neighbourhood planning qualifying bodies*

- *housing associations*

- *local landowners*

Close partnership working between these different groups may assist in managing expectations in terms of the timescales, financial rewards and resource commitments required for effective rural exception site delivery.

Paragraph: 015 Reference ID: 67-015-20210524

Existing Local Plan Context

The existing Test Valley Local Plan set a target of 200 (net) affordable homes per annum between 2011 and 2029. The Test Valley Annual Monitoring Report 2022/23 confirms that overall, this target has been met since adoption of the LP, however in the 2022/23 monitoring period only 114 affordable homes were delivered. The AMR does not identify that any of the affordable homes were delivered through a rural exception scheme.

Policy HOU3 and whether it is a sound way to deliver affordable housing through exception sites in Test Valley?

The January 2022 'Strategic Housing Market Assessment' (SHMA) gives an assessment of affordable housing need at Section 5. The SHMA has identified a need for 437 (net) affordable rented homes per annum across the district, as well as a need for at least 215 (net) affordable home ownership dwellings per annum. This is a significant increase on the affordable housing need set out in the 2013 SHMA, which identified a need of 292 rented dwellings per annum.

ERHA support the inclusion of a rural exception sites policy within the Local Plan as an important mechanism to deliver small scale rural affordable housing. However, modifications are required in order to address paragraphs 16 and 35 of the NPPF to ensure a positive framework is set for rural exception sites.

Paragraph 5.384 of the supporting text states that '*The mix of dwellings will be guided by the identified need, as evidenced by a Local Housing Needs Survey (LHNS) and/or the Housing Register.*' It would be helpful if this clarification on how the Council expect needs to be evidenced is also included within criterion a) of the policy text.

It is important to note that there are a range of evidence sources that will be applicable to identify need including Local Housing Needs Surveys, as well as the Council's Housing Register. ERHA consider that local housing need surveys can include those commissioned by a community, and those that are commissioned by an applicant. Flexibility is therefore needed to allow a range of sources to be used as evidence of need.

It is also noted that there are other cases where exception sites may meet the needs of adjoining parishes, particularly where a range of smaller parishes or settlements and development in one will support a range of communities. A flexible wording is required to address these concerns in criterion a).

ERHA object to the supporting text at Paragraph 3.385. The NPPF does not restrict the location of rural exception sites to only that which is well related to community facilities and public transport, but rather permits them to come forward in any location. Whilst it may be desirable for sites to come forward that are in close proximity to facilities such as schools, health services and shops, rural areas by their very nature have limited access to services and facilities. This restriction would therefore be highly restrictive and counter-productive to the aim of rural exception sites, preventing the provision of housing to meet local needs in many rural communities. This supporting text should therefore be deleted.

Criterion d) of the Policy should be deleted. ERHA would not support a policy that contains inherent blockages to the delivery of rural exception sites given the national and local imperative to meet needs at the earliest opportunity. The suitability of land must be guided by land-use considerations and not a public competition for potential candidate sites.

ERHA support the recognition within the Policy that market housing may be needed in some cases to deliver schemes and ensure affordable housing needs are met, and are supportive of the requirements for this to be limited to the necessary maximum in order to achieve viability. Whilst it is important to ensure the primary purpose is to provide affordable housing in perpetuity, in our experience it is becoming increasingly necessary for proposals to provide some market housing to make the proposal viable and deliverable in the short term, as a result of external factors such as higher build costs and land owner expectation, which must be balanced against delivering affordable housing at the restricted rents affordable to their

tenants. This has recently become more evident through the regrading of many registered housing providers from V1 to V2, which reflects the broader decline of economic conditions and business capacity from the disconnect between rent levels and costs.

A range of modifications are recommended to the Policy HOU3 text as summarised below.

Modifications to address consistency with national policy:

- Amend Policy HOU3 text as follows:

Development for rural affordable housing will be permitted provided that:

a) The proposal is accompanied by evidence, such as a local housing needs assessment, the Council's household register, or other appropriate evidence, which demonstrates that there is an unmet need within the parish (or that parish plus its immediately adjoining parishes within Test Valley Borough) for accommodation by households unable to afford open market housing where a member of each household has either:

> *i. been ordinarily resident in the parish or previously lived in the parish and has a strong family connection; or*
> *ii. a demonstrable need by virtue of their employment to live in the village or its immediate surroundings; or*
> *iii. a demonstrable need to live within the village either to support or be supported by a family member.*

b) it is restricted in perpetuity to occupation by households with a member in housing need;

c) the proposed mix of housing meets the identified need;

d) an assessment of deliverable sites within the parish has been undertaken and informed the selection of the proposed site; and

e) where a proposal also includes open market housing to enable deliverability, that this is on the same site and demonstrated as being limited to the necessary maximum proportion of market housing in order to achieve viability, and is in proportion to the size of the development.

Affordable housing should be the predominate tenure in any event.

HOMELESSNESS IN THE COUNTRYSIDE:
A HIDDEN CRISIS

March 2023

Dr Carin Tunaker, Professor Helen Carr and Dr Laura Burke with Dr Guillermo Reyes-Pascal

Executive Summary

This report was commissioned, funded and co-designed by a coalition of housing and homelessness organisations concerned by the growing yet unacknowledged problem of rural homelessness.

The research found that:

- Rural homelessness is a real and growing problem that requires specific, locally informed and properly funded policy interventions. Without active interventions and good preventive services rural homelessness will keep increasing.

- People with intersecting disadvantages are particularly at risk of homelessness in rural areas. Support services are very dispersed and often unavailable.

- The voices of those experiencing, or who have experienced homelessness in rural areas are rarely heard. They told us about the high costs of food and transport and unavailable support services.

- The shame and stigma associated with homelessness in prosperous areas is a significant barrier to getting support. This intensifies the invisibility of rural homelessness which in turn leads to reduced support services, exacerbating need.

- Frontline workers have valuable insights into rural homelessness. 91% of professional respondents to our survey in rural areas told us that they think homelessness has increased in the last five years. This is corroborated by our analysis of the latest statistics from DLUHC which indicates that there is a 24% increase in rural rough sleeping in the past year.

- Rural poverty exacerbated by high housing costs are fundamental drivers of rural homelessness. Severe restrictions in local authority funding since 2009 intensifies risk. Rural areas receive 65% less funding per capita than urban for homelessness prevention who themselves are severely underfunded. Funding for genuinely affordable housing and state support for housing costs are also highly inadequate and have limited impact in rural areas.

- The aftermath of the Covid-19 pandemic and the current cost of living crisis leave people in rural areas at much greater risk of homelessness than before. We have a particular concern that 83% of respondents who work in rural areas think that addressing homelessness has become harder in the past five years.

We recommend:

- Improved information about the scale and distribution of rural homelessness and more developed understandings about what is distinct about rural homelessness.

- Recognition of and strategies to respond to the problem of rural poverty. This is particularly urgent in the context of the aftermath of Covid-19 and the cost of living crisis.

- A renewed political commitment to ending all homelessness including rural homelessness and other hidden forms of homelessness.

- In the light of market failure, a reconsideration of what it means for housing to be affordable and how genuinely affordable rural housing should be provided.

- A radical rethink of Local Housing Allowances and how they operate to exclude many from accessing housing in rural areas.

- Flexible, multi-disciplinary prevention services must be provided in rural areas with mental health services a priority. Those services must be proactive and seek out those in need. There needs to be innovation and joined up thinking in responding to the dispersed nature of rural homelessness.

- The provision of sustainable, reliable and affordable public transport links between rural and urban areas and market towns.

- Listening to those who are experiencing, have experienced or are at risk of experiencing homelessness in rural areas. Those experiences provide vital underpinnings to effective policy making.

Contents

1. Introduction

This research report, written by researchers from the University of Kent and the University of Southampton, was funded and commissioned by a number of organisations and Housing Associations working in rural areas who were increasingly concerned by what seemed to them to be a growing yet unacknowledged problem of rural homelessness. Inspired by Rory Weal's research into rural homelessness in the United States, funded by a Churchill Fellowship (Weal 2021), they organised themselves into a Steering Group to see how the knowledge gap and policy vacuum around rural homelessness could be addressed. The members of the steering group are listed in Appendix A.

Research on homelessness in most countries focuses on urban areas, where official statistics record larger concentrations of homelessness. The more dispersed nature of homelessness in rural areas and the perception that these areas are more affluent means they do not receive the same attention. This is not to say that there has not been research on rural housing and homelessness in the UK (most notably Cloke et al 2002, but also Satsangi et al 2010 and Gibbons et al 2020), but there is a significant knowledge gap, particularly post-pandemic, about contemporary rural housing and homelessness issues and the scale, effectiveness and nature of local interventions. There is significant research on rural homelessness in the United States (Spissinger 2019, Weal 2021) and Canada (Waegemakers et al 2016, MacDonald and Gaulin 2020, Buck-McFadyen 2022), as well as some comparative projects (Milbourne and Cloke 2006). An interesting consensus emerges from the literature:

- Rural homelessness is often hidden, invisible and under-reported.

- Rural homelessness requires targeted and specific interventions that are different from those in urban areas.

- National welfare programmes and initiatives are rarely set up to consider their impact in rural areas, which limits their ability to tackle rural poverty (Milbourne 2010).

Our research took place between January 2022 and February 2023, and was a collaboration between the Steering Group and Research Team. The project also benefited from advice and support from a Sounding Board, comprising key organisations and stakeholders concerned with homelessness in the UK. Further information about those involved is available on the project website: www.research.kent.ac.uk/rural-homelessness

Whilst this report has been written independently of the Steering Group, the authors are very grateful for its careful reading and comments on the contents and would like to acknowledge in particular the input and insights of Martin Collet and Rory Weal. The authors would also like to acknowledge the time and thoughtfulness of all those who responded to the survey, participated in interviews, invited us to projects and joined in conversations about rural homelessness. Without their insights, particularly of those who are experiencing or have recently experienced homelessness, this report would be considerably diminished.

Research Questions and Aims

The aim of the project is to address the lack of evidence about rural homelessness, paving the way for possible larger scale research projects into rural homelessness. For the purposes of the project we took a broad definition of homelessness, incorporating not only rooflessness but those living in insecure accommodation and/or at risk of becoming homeless in the near future. This

moves beyond England's definition of statutory homelessness to include consideration of all 'core' and 'wider' homelessness categories (Bramley 2017). Although the project is small in scale, it has enabled a review of existing knowledge and data and the identification of research gaps. We have also been given 'snapshot' insights into the experience of homelessness and rough sleeping in the countryside from interviews and conversations with people who are currently, or have recently been in this situation, who were very generously willing to share their stories. In addition we have benefited from the insights of housing/homelessness professionals from statutory and third sector organisations. Many of those who talked to us have worked on housing and homelessness issues in rural areas for a very long time. We recognise that without their dedication and expertise the situation for those experiencing homelessness or who are at risk of homelessness would be considerably worse.

The research aims to:

- Identify the evidence gap between rural and urban homelessness;

- Consider possible intersectional causes of homelessness that structurally disadvantage certain populations;

- Investigate whether ending rural rough sleeping requires distinct policy responses; and

- Inform government responses to rural homelessness and rural housing policy.

Field sites

Our research took place in four rural areas, selected to represent different types of rurality throughout England. Choosing a range of rural areas was important as the ways in which homelessness is experienced and responded to locally differs.

In making our selections we drew on the 2011 Rural-Urban Classification for Local Authority Districts in England (Government Statistical Service 2017) which categorises settlements

with a population of over 10,000 as 'urban', and recognises three different types of rural local authority districts: 'mainly rural' 'largely rural' and 'urban with significant rural'. For coherence and policy impact in a small scale project, we focussed our qualitative research in England, but our survey was open to anyone in the United Kingdom. As the legal framework for housing and homelessness is different in each of the devolved nations, our recommendations and findings focus on England only.

2011 Rural-Urban Classification for Local Authorities in England

Predominately rural
- Mainly rural
- Largely rural
- Urban with significant rural

Predominately urban
- Urban with city and towns
- Urban with minor conurbation
- Urban with major conurbation
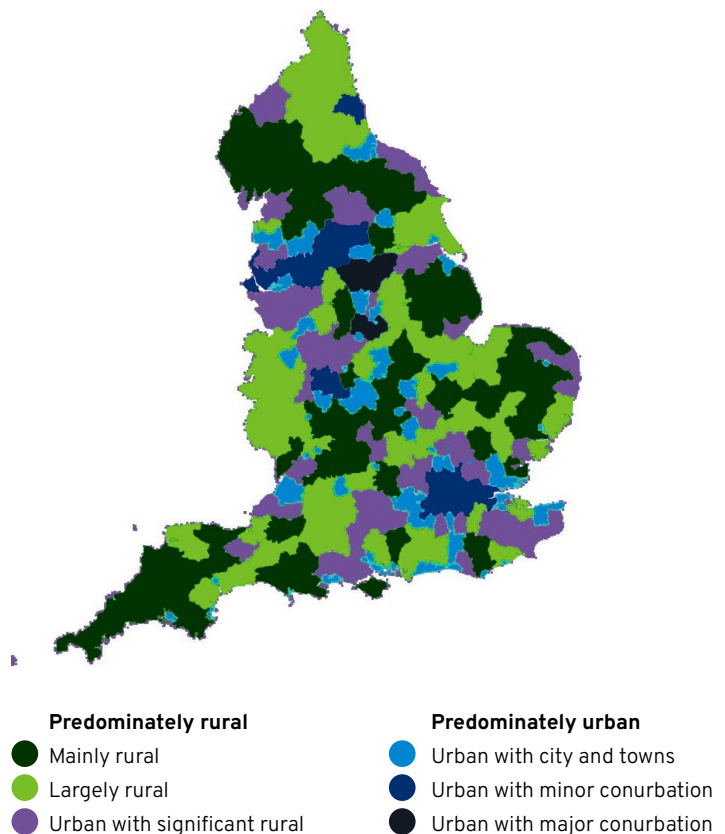
Our choices of field sites reflected the need to consider areas from different geographical locations in England, and took into account the different dispersal of centres of population within and within reach of the area. We also considered proximity to urban areas, as well as proximity to larger settlements that are still considered rural within the Rural-Urban Classification system. We chose areas

which were not, or at least not predominantly, coastal. We focussed on rural settlements of under 10,000 inhabitants within the counties chosen, and paid particular focus to smaller settlements of under 3,000 inhabitants. Our research sites were South Cambridgeshire, Herefordshire, North Yorkshire and Kent.

South Cambridgeshire, mainly rural

The district comprises more than 100 villages, and no towns. The district totally surrounds the City of Cambridge, a large urban district with a significant population of students and those working in higher education and research. The district is around 50 miles from London and combines traditional sectors such as farming with technology, finance, and business located at a small number of business and innovation parks. The South Cambridgeshire District Council (SCDC) is based at a business park in the village of Cambourne, about 1 hour from the City of Cambridge. SCDC reports[14] low levels of people who are sleeping rough (5), whereas the City of Cambridge report high levels (23). People migrate from the SCDC area to the city of Cambridge to access the support available there such as hostels and hot food provision. They are also directed to the City by the SCDC. Despite the City of Cambridge and SCDC being two different district councils, there is a clear relationship between them, with people experiencing homelessness, as well as housing and homelessness providers in SCDC, relying on the City to provide support for people sleeping rough, as well as a joint housing strategy. According to our conversations, at the time of the research there were three individuals 'living off grid' in the rural areas on the edge of the City and into South Cambridgeshire. These individuals have been contacted and apparently chosen not to engage with services. The main issue SCDC reports is homelessness arising from the termination of Assured Shorthold Tenancies (ASTs) with no other affordable options available. Homelessness in the area rose significantly between 2012 - 2019 with the largest factors being terminations of ASTs, which overtook the factor 'parents no longer being able to accommodate' their children. Based on

these trends and taking into account rising private rents, SCDC expects homelessness to continue to increase significantly. There has also been a notable increase in complex cases with clients requiring mental health support.

Herefordshire and North Yorkshire, largely rural

In largely rural areas, such as Herefordshire and North Yorkshire, urban conurbations are further away. Our research found that many people who sleep rough in rural areas are escaping challenging situations in urban centres, such as violence, abuse, crime and drug related negative relationships. This means they do not want to seek support or accommodation in cities or towns, but then find that rural areas have limited options for emergency or temporary accommodation and support. Furthermore, people do not necessarily escape the problems of the urban; county lines drug operations may operate in rural areas that have easy access from the motorway and congregate in the larger market towns.

Public transport to urban centres or larger towns has become more inaccessible in recent years due to reduced services and increased prices, thus limiting options for support even further. Some also told us that they were 'born and bred' in the area and reluctant to go elsewhere, so offers of accommodation out of the area have not been right for them. Some mentioned not wanting to leave support networks in the area or leaving behind their sense of belonging to a village or hamlet. There are therefore both emotional and practical reasons for those experiencing rural homelessness to stay in their local areas. One person with experience of homelessness in a rural setting described it as a 'postcode lottery'; if you happen to be born in a rural area you simply do not have access to appropriate services and support when in a crisis.

In Herefordshire we found that most services were based from the central town of Hereford. Travelling to Hereford from the surrounding market towns and villages was expensive and difficult without a car as the area comprises mainly C roads leading

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[4]Rough sleeping snapshot data 2022 https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2022/rough-sleeping-snapshot-in-england-autumn-2022#annex-regional-maps [accessed 03/03/2023]

off single carriageway A roads. A number of charitable organisations, food banks and church run services provided support in areas outside the town. Farming is the main industry alongside manufacturing and food and drink production. Agricultural jobs are often seasonal meaning that those relying on work in the industry could be without work in the winter months.

In North Yorkshire we found it was challenging to access shelters and support. Much support for rough sleeping is based in areas with more dense populations. However food banks were in operation and were reported to be very busy. There were a range of small charitable and religious organisations providing different kinds of support such as warm spaces and community fridges. Tourism is critical to the economy in North Yorkshire, particularly in the Craven District, which sits on the edge of the Yorkshire Dales National Park. The increase in holiday lettings including AirBnB was explained to us by local organisations as a significant issue affecting the housing market. The area also sees migration of people begging from urban centres to more affluent market towns and those popular with tourists.

Kent, urban with significant rural areas
Kent, which is classified as urban with significant rural areas, sees more frequent movement between rural, urban and coastal settings. Kent, like Cambridge, is within easy reach of London, which probably impacts upon the forms of homelessness found in the county. The South East is also the area with the highest concentration of rough sleeping after London (gov.uk). We focussed our field work in the Ashford and Canterbury districts, but spoke with services and organisations across the county. We found that bus services are more frequent than in the more rural counties, and in many places have direct connections to larger towns or cities where support is readily available, compared to more rural areas. However transport in and out of smaller villages can be challenging as some locations have only one service per day. Organisations in Kent talked to us about the transience of homeless populations, particularly those rough sleeping. A typical scenario would be for someone sleeping rough moving between larger towns or cities to

find shelter, support, healthcare and food when needed, but moving into more rural parts for safety at night. However, issues with attachments to smaller villages and not wanting to move out of their locality were also prevalent. Poverty prevents people from staying in their local areas, when they want to. Finding appropriate types of property in terms of affordability and size in rural villages is problematic, and those on the housing register can wait for years, unless they are willing to move to an urban area, as rural housing stock has disappeared through the 'Right to Buy' scheme and has not been replaced.

Data collection

This research project made use of quantitative and qualitative data. Our methodology comprised four strands of data gathering and evidencing.

- Research/literature review with focus on information and research already available regarding rural homelessness, identifying the gaps;

- Analysis of existing data from DLUHC (Department for Levelling Up, Housing & Communities) regarding rural homelessness and rough sleeping;

- Quantitative data collection: Survey distributed to NGOs and Local Authorities (LAs), distributed nationally via a project website and social media;

- Qualitative data collection: Short-term ethnographic research in our four field sites, and telephone interviews with organisations from other rural areas in the country (see Appendix B). The ethnographic research took place between May 2022 and January 2023, with site visits ranging from 2 to 10 days. During this time we had group and/or individual conversations (informal or semi-structured interviews) with staff in NGOs and local authorities (LAs) as well as conversations with people with experience of rural homelessness. We aimed to speak with at least three people with experience of homelessness

in each area, but there was some variation depending on the time of year of our site visit and people's willingness to partake in the research.

For the ethnographic research we identified local organisations concerned with rural homelessness and we interviewed key personnel, including representatives from the Local Authority Housing and Homelessness teams. We also met and spent time with people currently experiencing homelessness in each area, and completed in-depth interviews (full breakdown of interviews in Appendix B). In collaboration with all interviewees, we mapped out availability of vital services, including health, food, advice, hygiene, public transport.

Our survey (N=157), which was completed by staff members in organisations working with housing and homelessness in the UK (see Chapter 3 for further details), comprised questions relating to experiences of homelessness in different areas of the UK, including specific questions about how rural homelessness differs from urban. Survey data was analysed and cross-tabulated using SPSS and produced statistically significant findings.

Ethics

We worked with our Steering Group to identify our case study areas and potential participants and to gain informed consent. We prepared information sheets, aimed at different audiences, to inform participants about the project aims and activities, including the organisation and funding of the research, the process of ethical approval, the intended beneficiaries, the project team and access to the data. The sheets also explained what participation in the project would mean (time commitment, activity), how data would be used, the measures to protect confidentiality, the process of data anonymisation, where results will be published, how data will be stored, feedback on the project outcomes, and the right to withdraw from the research. Participants were asked to complete and sign a consent form[5] before taking part in any research activities. People who were experiencing

homelessness at the time of the project were offered shopping vouchers for their time. To protect those taking part in the project we ensured that all interviews took place with a support worker present, or in a shelter with support staff available. All participants have been anonymised, including place signifiers that may give away their locations.

For qualitative data we made use of a confidential, professional transcription service to transcribe recordings of interviews and meetings. Ethnographic fieldnotes, interviews, telephone interviews and group interviews were analysed in a two-tiered thematic approach, using coding to identify key issues and then completing more detailed analysis to unpack relevant information that related to our key themes.

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[5]In some instances verbal consent only was obtained at the request of interviewees.

Good practice example:
Pop-up legal clinics

Pop-up Legal Clinics

The Chief Executive of two small separate homeless charities told us about how they responded to the problem of getting legal advice to people who are homeless or threatened with homelessness in rural areas. They created 'pop-up' legal clinics which use local libraries and similar sites. They bring in a solicitor from a London Law Centre on Zoom, they have support workers there, and they provide legal advice that way. It has a cost, but it is much more sustainable than setting up a law centre which would not really work in a rural area. At the moment the advice is limited to housing and homelessness but they are thinking of extending it to adult social care.

2. Rural Governance and Housing Law

In this section we explain the formal policy responsibilities for housing and homelessness in rural areas and set out the legal framework as it impacts upon people who are experiencing or threatened with homelessness. Here we will also consider the criminal law as it affects people experiencing homelessness. The section will put the findings from the survey and field sites into their broader legal and bureaucratic context.

Local government

The structure of local government varies from area to area. In most of England there are two tiers of local government – county and district – and responsibility for council services is split between them. District councils are responsible, inter alia, for housing and homelessness services. County councils are responsible for social services including adult social care. The complexity of the problems that underpin rural homelessness means that responsibilities for services that individuals may require may be split between district and county level. Our professional interviewees noted that the bureaucratic divisions between county and district councils can impede the wraparound care that those experiencing homelessness or are at risk of homelessness may need. Particular difficulties have been experienced as a result of county councils historically having control of Supporting People funding whilst district councils have housing and homelessness responsibilities.

The county council/district council split is not present in all rural areas. Whilst unitary authorities which provide all local government services in their areas are generally concentrated in cities and larger towns there are now six shire county councils that are unitary, including Herefordshire, one of our field sites. North Yorkshire, another of our field sites, is due to become a unitary local authority in April 2023 replacing North Yorkshire County Council, and seven district and borough councils. This will bring together spending power and services to reduce the impact of rising costs. It is anticipated that savings will be directed towards housing, health care, transport links and local enterprise.

At the time of our field work, in each of our other two research sites, Kent and South Cambridgeshire, there was a county council/district council split. South Cambridgeshire is however part of a combined authority, Cambridgeshire and Peterborough. Being part of a combined authority does not replace the existing local authority structure but it is a means for pooling resources and making collective decisions. There was some evidence that this worked well for the effective delivery of services.

The legal framework

The legal framework differs in each of the devolved areas of the UK. In this report we are concerned with England where the law about individual entitlement to housing assistance is set out in Part 7 of the Housing Act 1996. The responsibilities upon housing authorities have been considerably extended since then, first by the Homelessness Act 2002 which facilitated a strategic approach to housing and homelessness and more recently by the Homelessness Reduction Act 2017 which focussed on prevention. It places duties on local authorities to intervene at earlier stages to prevent homelessness in their areas. It also requires housing authorities to provide homelessness services to all those affected, not just those who have 'priority need'.

The current Homelessness Code of Guidance was last updated on 31st January 2023. It provides extensive policy guidance on how local authorities should operate the legislation. Some of the housing professionals we interviewed suggested that priority need requirements were a barrier to providing effective help.

The Housing Act 1996 (HA 1996)

The law about homelessness is not expressed in terms of individual rights but in terms of duties that local housing authorities have towards certain individuals who are homeless or threatened with homelessness.

In summary, local authorities owe duties to provide accommodation (or assistance to obtain accommodation) to some people experiencing homelessness. These duties only arise if an applicant is

i. homeless or threatened with homelessness

ii. not subject to immigration control, and

iii. has not left their previous accommodation intentionally.

iv. In addition, they must fall into a category of priority need, which includes

    a. pregnant women

    b. people with dependent children, and

    c. people who are 'vulnerable as a result of old age, mental illness or handicap or physical disability or other special reason'.

Where the local authority has reason to believe an applicant is homeless or threatened with homelessness, they have a responsibility to inquire whether any duties are owed to them. If an applicant successfully establishes they are owed a duty, the local authority can decide to house them in the private rented sector.

Priority need

Various updates have been made to the categories of priority need since 1996. The Homelessness (Priority Need for Accommodation) (England) Order 2002 strengthened the assistance available to people who are homeless or threatened with homelessness by extending the priority need categories to homeless 16 and 17 year olds; care leavers aged 18, 19 and 20; people who are vulnerable as a result of time spent in care, the armed forces, prison or custody, and people who are vulnerable because they have fled their home because of violence.

The Domestic Abuse Act 2021 amends Part 7 of the 1996 Act to further strengthen support available to victims of domestic abuse by extending priority need to all eligible victims of domestic abuse regardless of whether they have children, if they become homeless as a result of fleeing domestic abuse. Domestic abuse is broadly defined in the legislation to include behaviour which is controlling or coercive, psychologically or emotionally abusive and financial abusive as well as physical or sexual abuse and violent or threatening behaviour.

The other significant legal change in connection with priority need is the decision of the Supreme Court in Hotak v London Borough of Southwark [2015] UKSC 30 (Meers 2017). The Court decided that when judging vulnerability a housing officer must compare the applicant before them with an ordinary person if made homeless, and not, as previously thought, with an ordinary actual homeless person. This not only simplifies the legal test but also makes it clear that decisions on vulnerability must take account of all an applicant's circumstances.

Local connection

Several of our professional interviewees suggested that the lack of local connection was a barrier to people receiving local authority assistance. This may be because they have misunderstood the law on local connection, or that local authorities are inappropriately using local connection as a gate-keeping exercise.

The Housing Act 1996 provides that, if an applicant has no connections in the area they are applying, but they do have a connection (known as a 'local connection') to another local authority, the local authority receiving the application is permitted to refer them back to that other authority. It does not, as is often mistakenly stated, mean that an individual must have a local connection with a particular area if they are to make an application there. A local connection can be established through residence, work or family connections.

Ineligibility

There are certain categories of people who cannot apply for housing help because they are statutorily ineligible for housing assistance although they are entitled to advice and information free of charge. These rules are complex and subject to change, but in summary they require either that an applicant is habitually resident (has a settled home) in the Common Travel Area i.e. the UK, the Channel Islands, the Isle of Man and or the Republic of Ireland or that they are people from abroad who are specifically eligible for housing assistance. In general people subject to immigration control (that is people who require leave to enter or remain in the UK (whether or not such leave has been given) are not eligible for housing assistance but there are some exceptions. These include refugees, people with indefinite leave to remain and EU settled status as long as they are habitually resident, people with humanitarian protections and people with leave granted under Article 8 of the Human Rights Convention.

The Homelessness Act 2002

This Act introduced requirements that local housing authorities adopt strategic approaches to tackling homelessness by requiring (i) regular reviews of levels and likely future levels of homelessness in their districts and (ii) homelessness strategies aimed at the prevention of homelessness.

The Homelessness Reduction Act 2017 (HRA)

The HRA, which came about at least in part as a result of the campaigning work of Crisis, introduced five key changes to the legal framework set out in the Housing Act 1996 (Cowan 2019)

  i. people threatened with homelessness should receive proper advice;

  ii. a duty is placed on specified public authorities to refer applicants to housing authorities ('the referral duty');

  iii. local authorities must work with applicants to produce a personalised plan of action following an assessment;

  iv. local authorities have a duty to prevent homelessness ('the prevention duty')

  v. local authorities have a duty to relieve homelessness ('the relief duty').

The Act also extends the definition of 'threatened with homelessness' so that duties are owed if it is likely a person will become homeless within 56 days (as opposed to 28 days under the 1996 Act). Someone who is served with a valid notice under s.21 of the Housing Act 1988 to end their assured shorthold tenancy is also treated as if they are threatened with homelessness if the notice has expired or will expire within 56 days and their rented accommodation is the only accommodation that is available for them to occupy.

Our professional interviewees generally welcomed the Homelessness Reduction Act, although one commented that it was like 'Marmite'; either loving it or hating it. Whilst it was full of good intentions it was a 'bureaucratic sledgehammer'. Their wish was that the bureaucracy be streamlined, and that front line workers should be involved in the design of any preventive service.

Criminal law and homelessness

Concerns about the unproductive impact of criminal law on people sleeping rough are long standing. Although provisions repealing the Vagrancy Act 1824 have been enacted via the Police, Crime, Sentencing and Courts Act 2022, the repeal is not to be implemented until the government decides upon replacement provisions. The government has indicated that it intends that the replacement law will prioritise those specific forms of begging that can be most detrimental and which may involve aggressive behaviours and it will provide for responses that encourage and mandate individuals into support (DLUHC 2022). The consultation on the replacement provisions closed in May 2022 but to date there have been no proposals published about alternative provisions. Squatting of residential property was criminalised by s.144 of the Legal Aid, Sentencing and

Punishment of Offenders Act 2012 despite evidence from Crisis that criminalising squatting would only work to further criminalise vulnerable people and that squatting was more a reflection of scarcity of provision and inadequate support and assistance than evil intent (Crisis 2011). There have been some suggestions that the criminalisation of squatting has led to poor outcomes and even death (Hern 2013).

There is a raft of other anti-social behaviour measures from criminal behaviour orders to dispersal orders that are available to the authorities to control the behaviour of experiencing homelessness. Of these perhaps public space protection orders (PSPOs) are the best known. Introduced by the Anti-Social Behaviour, Crime and Policing Act 2014 PSPOs replaced previous legislation and introduced flexible locally focused powers to deal with nuisances or problems which are perceived to harm the local community's quality of life. An order will specify an area where harmful activities may be taking place and can impose conditions and restrictions on people using the specified area to prevent the prescribed behaviour. The impact of these measures on people experiencing street homelessness has been researched by Heap et al (2022) who note a strong correlation between the behaviours associated with people experiencing street homelessness and the sanctioned behaviour such as sitting on the pavement. They report that,

People experiencing street homelessness said they felt constantly policed within a PSPO area. The PSPO can be considered a mechanism for controlling the street sleeping population. Many of our participants felt harassed by the nature of the policing, feeling continually on edge. This was fuelled by the high volume of informal interactions with the policing bodies where they were repeatedly told to move on.
(Heap et al 2022: 136)

People sleeping rough are also more likely to be subject to informal enforcement measures, such as being moved on by the police (Crisis 2017, Heap 2022).

Avoiding the police is likely to contribute to the invisibility of rural homelessness. It also potentially diverts people from support rather than engaging with their needs. As Heap et al note,

There was consensus amongst our participants that the way the PSPO was policed, such as moving people on and tipping away alcohol, did not solve the underlying ASB problems. This view was supported by the participants experiencing street homelessness who confirmed that the PSPO did not change their behaviour, but instead made their lives more difficult and unpleasant. It was also clear from these participants that the PSPO was not often used to engage and support (Heap 2022: 138).

Criminality associated with homelessness

The association of homelessness with criminality can act as an additional barrier to the provision and access to effective support.

One hostel in Cambridge often got phone calls from the police after noise complaints from neighbours. The neighbours complained about groups of people smoking crack and being antisocial in a park backing onto the hostel and assumed it was people using the hostel who were causing the issues. A charity worker told us that it wasn't people in the hostel, whose beds were in high demand, who were being antisocial in the park. However, neighbours simply linked the behaviour to the hostel. This served as an example of how people in the area had a lower tolerance for anti-social behaviour as well as the stigma and criminal association attached to homelessness. This is despite the fact that research by Crisis has shown that people sleeping on the street are almost 17 times more likely to be victims of violence compared to the general public.

On the other hand sometimes breaking the law was the only way some people felt they could survive on the streets:

"I know a lot of homeless people like me brother, he was, and me brother was homeless for five and a half years before he got his

property. And yeah, and then the council was on the verge of kicking him out 'cos they didn't like him and because of his criminal record. Obviously, he had to go out stealing to go and get food. He had to do what he had to do to survive, that's what most homeless people do, that's why some homeless people go out, do serious crimes 'cos they know they can go to prison, they've got a roof over their – they've got three meals a day, at least they've got a bed and everything to depend on like".

Instances of crime can have serious effects on community attitudes. Cambridge is a city known for cycling, and bicycles are a popular mode of transportation. One charity worker told us how they were disgusted by an online social media group that named and shamed bicycle thieves.

Often, stealing and selling bicycles was a source of income for people experiencing homelessness. The online group claimed that thieves were mainly drug addicts who had 'already lost all dignity' and invited photo and video footage to be posted to the group so the community could identify them. Whilst it was obviously wrong to steal bicycles, the charity worker was disgusted at the aggression and verbal abuse the online group directed at people experiencing homelessness, and the lack of sympathy and understanding for their situation. Sometimes people's family members would intervene and defend people accused of theft, explaining their difficult situations and asking the community to 'give them a break'.

Good practice example:
Mobile community hub

Turning Tides is a West Sussex single homelessness charity that runs various rural homelessness initiatives. Their mission is to end local homelessness, putting local communities at their heart. This includes the predominantly rural areas of Horsham and Mid Sussex. Rough sleeping is much more hidden than in the towns but with such a huge geography they struggled to make sure people rough sleeping could find them. The first thing they learnt was to enlist local businesses, park staff etc to be their eyes and ears for referrals, but a further challenge was to find a place to meet people sleeping rough. As a solution, they started a mobile hub in a converted double decker bus.

It is highly visible when parked up in various locations. It meant Tom, who has been rough sleeping for 6 years with severe alcohol issues, could meet his outreach worker safely, have showers, warm food and make plans. He had been in and out of hostels for years. Over time Turning Tide's worker based in the bus has managed to build trust with Tom and after some temporary hostel stays he will now go into one of their Housing First flats leading to long term independence.

3. Survey Findings and National Data

The survey was distributed online via social media and email and through our project website. It consisted of approximately 60 questions relating to homelessness in rural areas, including one free text question. Our respondents (N=157) were spread across the country, with higher response rates from the South of England. The survey was open to anyone in a housing or homelessness organisation in the UK, but the majority of our respondents were from England. We have analysed findings from the survey overall, as well as analysing results from respondents who stated their organisation is based in a rural area.

Those who completed the survey were from Local Authorities (50.5%), NGOs such as campaigning organisations (10%) and social organisations, such as shelters (18%), and some did not fit any of these categories (18%) and 68% were from rural areas. It is also worth noting that 34% of those who completed the survey reported that they had experienced homelessness themselves in the past.

Our survey was not designed to, and nor did we have the resources to produce accurate figures for the scale of homelessness in rural areas, but it did give an indication of how organisations working with rural homelessness view the problem.
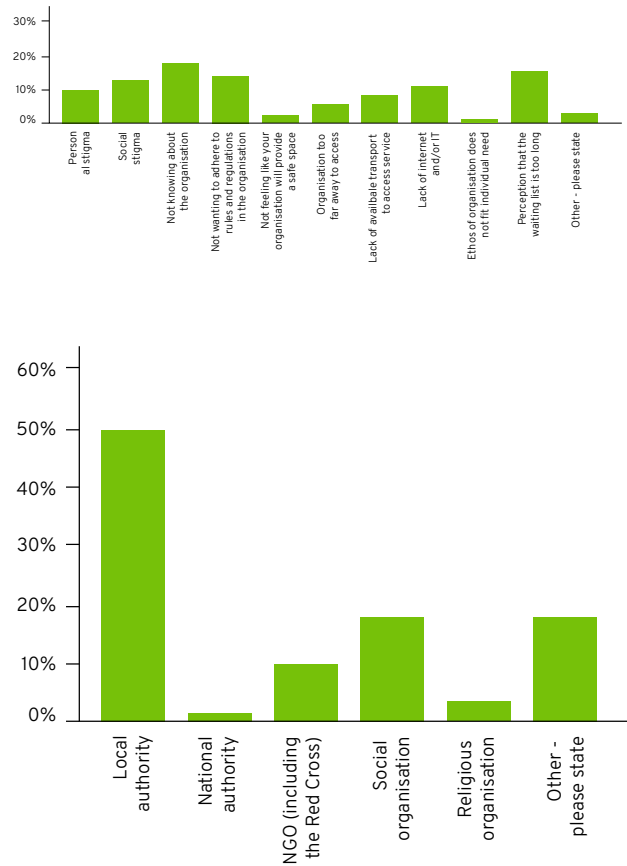
Main findings

86% consider homelessness to be a significant or acute problem, with 55% stating it is a significant problem in their area of action, and 31% considering it a major problem or an emergency.

88% of all respondents from rural and urban areas think that homelessness has increased in their areas in the past five years.

91% of respondents from rural areas believe homelessness has increased in their location in the past five years.

83% of respondents who work in rural areas think that addressing homelessness in rural areas has become harder in the past five years.

Our survey respondents highlighted that rural homelessness is distinct from urban homelessness and that those experiencing homelessness in rural areas receive less support.

81% of respondents believe that rough sleeping is experienced differently in rural compared to urban areas.

81% of the respondents consider the overall experience of homelessness in rural areas is different from urban scenarios.

55% of the respondents think that the reasons for rural homelessness are different from urban homelessness.

65% of those who work in rural areas believe that rural providers are less supported in comparison to their urban counterparts.

47% think that the future prospects for rural providers are negative, although nearly the same percentage of respondents stated that they do not know (44%).

The two most common responses from the open-ended question asking what is distinct about rural homelessness referred to invisibility and lack of resources. Respondents highlighted the perception that rural homelessness does not exist or that people are less aware of it, because they don't see it. They also highlighted that urban areas tend to have more resources to deal with homelessness which may be at the expense of rural settings.

> *"People do not believe that rural homelessness exists, but it does. There are far fewer accommodation options in rural villages with high second home ownerships and few AST [Assured Shorthold Tenancies], and we do not build sufficient social housing."*

> *"Provision of accommodation and support for homeless people tends to be concentrated in urban areas, yet many rural residents are understandably unwilling to move to urban areas to access services."*

Drivers for rural homelessness

We asked our respondents to tell us what they believe are the three most important drivers for homelessness in their area. The survey showed that LAs and organisations believe the three most important drivers of rural homelessness are a lack of funding and resources, followed by a lack of affordable accommodation and emergency accommodation, and a lack of mental health provision.

80% of respondents believe that the main obstacle in addressing homelessness in their area is structural (lack of funding/resources/housing), rather than individual (reasons relating to choices or actions by the individual).

What are the three most important drivers?

29% of all respondents stated that a lack of affordable housing and emergency accommodation is the most important reason for the increase in homelessness in their area in the past five years.

Respondents from rural areas stated that the three most important drivers for homelessness in their areas are:

16%
Lack of affordable housing

14%
Decline of social sector housing as a proportion of all housing

11%
Financial problems

Other drivers:

9%

of all respondents stated that substance misuse is one of the top 3 reasons behind the increase in homelessness in their area

11%

of all respondents believe that mental health is one of the top 3 reasons for the increase in homelessness in their area

43%

of all respondents stated that housing (both emergency and affordable housing), B&B's and shelters (Emergency accommodation; Hostels; Assured Shorthold Tenancies (ASTs); Housing First) are lacking in their areas

Respondents from rural areas stated that the 3 most important services lacking in their areas were:

45%

housing (Emergency accommodation; hostels; AST's; Housing First);

16%

mental health services; and

12%

domestic abuse/gender based violence services.

What are the services most in demand in your area?

18%

of all respondents stated that the services in most demand in their area is emergency accommodation

18%

of all respondents stated that the services most in demand in their areas are mental health services

12%

of all respondents stated that food (including food banks and soup kitchens) is the service in most demand in their area

"Lack of services available, overstretched statutory services, limited housing availability, lack of funding support for homelessness charities, breakdown of partnership working around people sleeping rough by local authority [are some of the biggest challenges]. People living with complex needs not sufficiently supported. [Further problems include] Major cuts to funding for floating support services Lack of work opportunities, lack of temporary accommodation, lack of transport."

Proportion of respondents listing barriers in their top 3 in rural areas

Respondents told us that stigma is one of the most important barriers to people seeking support in rural areas. The lack of affordable and reliable public transport was also noted in the free-text comments as a very big problem in rural areas.

- 23% of respondents think that stigma, either personal or social, is one of the three most important reasons/barriers that people experiencing homelessness face when seeking support.

  "We provide services in a rural area which attracts wealthy incomers, resulting in a housing market that is almost impossible to access for those with modest incomes. It seems at times that the wealthy incomers are the most vociferous opponents of new rural affordable housing schemes, and we often hear prejudice against 'those sorts

of people' who require affordable homes."

"Rural communities tend to be more insular and sometimes less welcoming."

- In our free text comments many commented on travel being an extremely important factor in the challenges of rural homelessness.

"I think that there is a lot more hidden homelessness in rural areas. There are fewer services as the demand is lower, access to services is difficult due to poor transport links. Low wage economy and super ageing population in a beautiful area means that there is a prevalence of second/holiday homes. Social/affordable housing is difficult to access so people sofa surf. There are fewer people with [no recourse to public funds] NRPF as there is little to attract them to the area - no shelters/ work prospects/housing/visible migrant support services."

Rural respondents: Main driver for increase of homelessness in the past 5 years (choose up to 3)	Percentage
Decline of social sector housing as a proportion of all housing	14.34%
Groawing fragmentation of families	4.78%
Lack of affordable housing	15.81%
Reduced welfare provision	9.19%
Tighter mortgage regulation and higher costs for first time buyers	2.94%
Unfavourable market conditions	2.21%
Addiction	7.72%
Discharge from prison	5.15%
Financial problems	10.66%
Leaving the care system	3.68%
Mental illness	9.93%
Relationship breakdown (including domestic abuse and violence)	11.03%
Other reason	1.84%
Do not know	0.74%
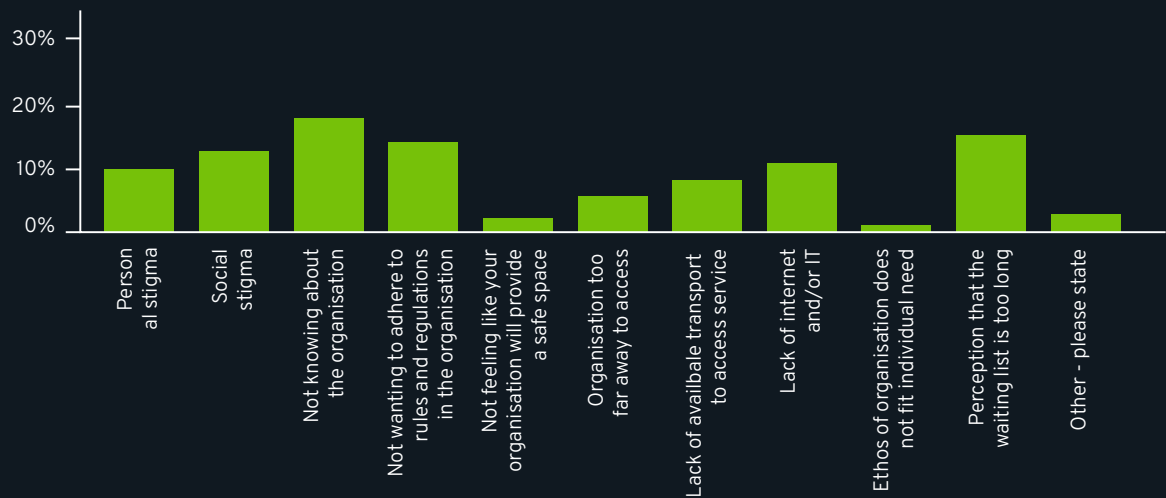
National data

Scale of rural homelessness according to government statistics

In addition to our survey analysis, we examined official statistics on rough sleeping and homelessness in England. In official statistics, the scale of rough sleeping in rural areas appears to be small in comparison to urban homelessness. In other words, the number of people sleeping rough in rural areas is smaller than that of people in urban areas. However, our qualitative research and survey have highlighted that organisations in rural areas perceive homelessness to have increased over the last five years, and many report that they believe the figures in official statistics are not accurate. Additionally, although the number of people experiencing homelessness in the countryside are lower than in urban areas, the increase in reported rough sleeping in rural areas is nearly as high as in urban areas.

Rough sleeping data

The Department for Levelling Up Housing and Communities' (DLUHC) snapshot data from 2021 showed a total of 2443 people were sleeping rough in one single night in England, out of which 382 were found in rural areas[4]. The total figure was a decrease of 9% from the previous year (DLUHC 2023a).

In 2022 the number of people sleeping rough has risen drastically to 3069, which is an increase of 26% from the previous year. Rural areas: 473 people were classified as sleeping rough in one single night in rural areas. This represents an increase of 24% (23.82%) in comparison to the same areas in the previous year.

Urban areas: 2,302 people were classified as sleeping rough in one single night in urban areas. This represents an increase of 25% (24.84%) in comparison to the same areas in the previous year.

Homelessness data

According to Crisis (2023) the rising levels of rough sleeping are also happening alongside increases in households accepted as statutorily homeless, as well as higher numbers of individuals in temporary accommodation, including children.

With figures currently available for 2021-22, the initial figures of assessments (290 180) nearly matches the pre-covid figure from 2018-19 (292 690), but the total amount of households owed a prevention or relief duty has increased (2018-19: 269 500) (2021-22: 278 110), which is an increase of 3%. Current data for the financial year 2022-23 is not yet available, but if the trend continues we can expect further increases in both households assessed as homeless, and those owed a prevention or relief duty.

Homelessness Prevention Grant

Funding allocations for homelessness prevention in rural areas is also significantly lower than in urban areas. For example, in the total allocation of the Homelessness Prevention Grant 2022-2023 rural areas will receive £29.270.553 and urban areas £263.508.049. This means that in the next financial year, rural areas will receive £234.237.496 less financial support than their urban counterparts (DLUHC 2023b). As population size is smaller in rural areas, we looked at this figure per capita.

- **Rural** local authorities receive **£2.50** of financial provisions for homelessness per capita.

- **Urban** local authorities receive **£7.15** of financial provisions for homelessness per capita.

Rural areas receive 65% less[5] financial provisions for homelessness per capita in comparison to their urban counterparts.

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4 The figures disaggregated by rural and urban areas have been calculated as follows: The rural category corresponds to the category "Predominantly Rural" from the 2011 Rural-Urban Classification for Local Authority Districts in England. The urban category corresponds to the category "Predominantly Urban" from the 2011 Rural-Urban Classification for Local Authority Districts in England. The category "Urban with significant rural" has been discharged as it cannot be catalogued as either rural or urban. These UK figures are directly extracted from the raw data provided by the UK Gov and relate to the jurisdiction of England. https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness and https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2022

5 This figure was calculated using government data regarding the Homelessness Prevention Fund for the year 2022-23 and calculated by total population size in Local Authority Districts considered as 'rural and 'urban', as defined in footnote 3. We also analysed the data per household in the areas, and the figure was similar. Please note that there are other sources of funding available for homelessness, rough sleeping prevention and intervention. We have analysed one funding stream only, showing an indication that funding is significantly less in rural areas. https://www.gov.uk/government/publications/homelessness-prevention-grant-2022-to-2023

Case Study **Mary's Story**

Mary* has two children. She was evicted from her house and moved into a caravan. When her children were taken into care she moved into a tent. Someone disturbed her tent when she went into the local town to get food so she slept on a bench in the entrance of the church.

She was able to collect clean water from the farmer whose land she was staying on. She had been in trouble with the police for lighting fires to keep warm.

'Like if I'm in a tent, obviously, I've got to – I know I've had the police come to me a couple of times, like for making a fire… they came there and told me to put the fire out, I'm like,

"How else do you want me to eat?" I've even had friends, obviously, I can't steal, I've even had friends who are saying, "Have you eaten today?" And I'm like, "No." And they've gone into town and they've actually stole food for me so I could eat that thing.*

'…some of me family don't drive and they've said come over and they can stay with me and I'm like – and that's down in [place], and it's going to cost you about £60 a train ticket and I'm like I haven't even got 60p.'

* Names have been changed to protect people's identities.

4. Understanding Rural Homelessness

One of our major findings is that rural homelessness is distinct from urban homelessness and requires specific policy attention. Causes, experiences, contexts and responses differ from urban areas and there are specifically rural characteristics that need to be taken into account. In this section of the report we consider some of the ways that experiencing homelessness in rural areas is different from experiencing it in the urban context. Before we do that however we acknowledge that drawing a clear line between the urban and the rural when understanding homelessness is increasingly complex.

Rural and Urban relations: the elimination of the rural?

In many ways our research goes against the grain of contemporary social research which suggests that the significance of place, and the meaning and importance of distinctions such as those between the urban and the rural, and the centre and the periphery, are changing and diminishing as a result of technological innovation (Agnew 2011). Whilst in this report we are insisting on the need to pay attention to the specificities of the rural, we acknowledge that it is at times challenging to draw clear distinctions between issues and experiences that are rural as opposed to urban; in a country as small and urbanised as England the urban and the rural are inextricably linked. Movement between areas takes place on a daily basis through work and other commitments, as does the transport of goods and services. People who are rough sleeping in rural areas may have recently left urban areas, perhaps driven away because of the expense of accommodation in the city, or attracted to the rural area because of the possibility of unskilled seasonal work. Alternatively they may be passing through a rural area on their way to the city. A survey respondent summarised the issues as:

"Lack of resources, and the resources we have are in larger towns leading to migration of rough sleepers to those towns. Geographical neighbours are similarly rural and have similar lack of resources leading to a lack of beneficial sharing of what little resources are available, for example: London boroughs can share resources within a few miles, rural authorities do not have that luxury with transport infrastructure difficulties and the huge geographical areas."

One example of the blurring of the rural and the urban is the case of 'county lines'. 'County lines' is a model of drug dealing which has emerged during the past 10 – 15 years in contrast with previous forms of street level distribution (Coomber and Moyle 2018). In the county lines model 'drug dealers are engaging in outreach activity and travelling from their urban hub to provincial towns and cities within a wide radius of their home turf, not just to deliver their product to that location as a 'weight' but also to retail it there themselves' (Coomber and Moyle 2018: 1324). Not only is the supply of drugs increased but vulnerable people are harnessed to undertake the supply operation at street-level. Dependent drug users, vulnerable women, looked after children, and adults with welfare needs are habitually targeted and recruited in a variety of front-line roles including as 'drug runners', 'commuters' and for 'cuckooing' - the practice of a drug dealer taking over a vulnerable person's accommodation and using it as a drug dealing base (Coomber and Moyle 2018). Whilst people we talked to in the course of this research mentioned county lines as a problem, the scale of this research project did not enable us to investigate it further, but we consider it requires far closer academic attention as it is likely to have an increasing impact upon rural poverty and rural homelessness.

Despite this evidence of a blurring of rural and urban space, we gathered evidence of particular rural problems.

Rough Sleeping

Specific challenges for people sleeping rough in rural areas include not being able to easily access food, water and other supplies. A common response from the people we spoke to who were currently sleeping rough in rural areas was that smaller rural shops charged higher prices, and often located too far away. Food banks in rural areas were also limited and often only open once or twice per week. Donations for food banks are often inappropriate as items need to be cooked, and most people sleeping rough do not have access to cooking facilities. There was also an interesting denial of the fact of rough sleeping in rural areas at all as well as ignorance about service provision. One of our survey respondents said:

> *"There are more places to sleep in tents, cars and vans. We get a lot of people who do not realise they are rough sleeping. This is very different in urban areas where a higher proportion of people will sofa-surf. People are also much more removed from services by geography. There is a lack of knowledge about what services are where, what they do and how to access them. As a result, more people develop multiple and complex needs, fall victim to gate keeping, and their situations become more entrenched".*

In rural locations we found that pets, in particular dogs, were important to combat loneliness and isolation, as well as being needed for safety and warmth. There is extensive literature on the importance of pets to people experiencing homelessness (Irvine 2013, Kerman et al 2019, Blomley et al 2020). Pet ownership can be problematic for people experiencing or at risk of homelessness as it can prevent people getting settled accommodation due to restrictions on pets in the private rented and social rented sectors. One of our professional interviewees told us that she was actively working on developing pet friendly accommodation. We think that pet ownership may be of greater significance in rural areas and may therefore pose a bigger obstacle to rehousing but we do not have the data to verify this. We suggest this could be the subject of specific research. One support worker hinted that they turned a blind eye

to pets being housed in temporary accommodation as they felt it helped people settle much more easily and was a source of wellbeing. A housing professional told us that they were developing accommodation which would allow pets as they recognised the need.

Rough sleeping in the countryside inevitably involves close contact with more settled residents and landowners, particularly farmers. Many of the people we spoke to had relationships with farmers, some of whom extended enormous amounts of goodwill and support to rough sleepers on their farmland. We saw examples of them providing access to clean water, offering cups of tea in the morning and allowing people to camp on their land. Some farmers were also frustrated by regulations that prevented them from allowing people sleeping rough to stay on their land, for fear of being criminalised by local authorities. We were not clear what regulations they were referring to. Not all farmers were positive about people sleeping rough on their land; some had experienced violence and aggression from trespassers and felt forced to contact police and local authorities.

Hidden Homelessness in Rural Areas

Hidden homelessness is a commonly used term which does not have an agreed definition and can be used to encompass or even disguise a number of complex problems. It often refers to populations that are not visibly rough sleeping, such as those sofa-surfing, squatting, or living in unsuitable accommodation. The term has also been used to refer to minorities within homeless populations, such as LGBTQ+ or ethnic minorities, who are less likely to appear in statistical data. Referring to any type of homelessness as 'hidden' is problematic, as Pleace and Hermans (2020) have argued. Defining a person's homelessness as 'hidden' does not reduce their vulnerability within the housing market and does not necessarily address the issues of exclusion they are likely to experience. It can also obscure the many reasons why different types of homelessness are not counted or included in official statistics. Many of the people we spoke with in rural areas described how much rural homelessness is not accounted for. There are

Case Study **Resilience**

One person who had experienced homelessness in the past was able to live on a friend's dairy farm whilst doing an apprenticeship told us:

"I grew up in a rural area and I very much felt that it was up to me to fend for myself, right? And I kind of think that is ok I guess….so it's about resilience as well and resilience of communities and resilience of people, though, I was homeless, I didn't not feel isolated, right? There was a community around me and for, you know, me. I could have been part of it if I'd wanted to be…but I think people who have a rural background might be less willing to seek help".

People with experience of rural homelessness talked about how they were helped by community members, such as farmers who gave them access to land or water, and local people who offered them work. This willingness of support and resilience within rural communities was a lifeline for many who had experienced long term homelessness in rural areas. However this could shield these people from

view. Rural homelessness was an issue that needed resilience when services were not available,but that resilience kept the issue hidden from view.

A young person told us how he focused on survival:

"I'm pretty screwed on, quite street smart, I know where I - I don't tell anyone my secret location. … Cos I'm not getting mugged and I'm not getting stamped on and I'm not sleeping in a doorway. 'Cos I live in a tent or what I call a one-bed semi-detached, underneath a tree, out of the way of people, near the wood because that's how you've got to do it."

He had really thought about what is necessary for survival:

*"Get some good boots, you know I could write a f*****g book on homelessness - Homeless for Dummies. Get a four season tent, cos come winter you're going to freeze your t**s off in f*****g one season tent, especially the tents they give you here, they are s**t. Sleeping bags here are s**t, you've got to buy - you've got to spend at least £1,000 on stuff".*

a number of reasons for this. Visibility is more challenging in rural areas, in particular for people sleeping rough who hide in farmland or woodland. Those who would otherwise sofa-surf have limited options in rural villages, and may be forced to sleep rough for this reason. Sofa-surfing was seen as problematic by some of our participants.

One participant was concerned with the number of people relying on family and friends for housing, or 'sofa-surfers'. Another told us how the sense of community in the area can be a double-edged sword; people may be able to rely on others, particularly family, in the community, but at the same time, this reliance keeps people 'hidden' from homelessness services and local authorities for a long time. Others may simply be out of sight or relying on the good will of the community. John* described some of the difficult situations he found himself in:

'I've slept in abandoned hotels by the river, and under the bridge by the river, and woke up covered in snow…'

'One night I slept in an old car park, and the building that was at the back of McDonald's was an old garage and the people who owned it were letting us stay there in like that little garage. But 'cos we were looking after the place they agreed to stay there until he sold it, which they did say in the end and they knocked it down and built all that new motorway…but that was all, that was one of the best places we had. We could lock the door from the inside so no one could get in, and we had a carpet and mattresses on the floor with electricity going from there to the toilet.'

One homelessness outreach team described the difficulties of engaging people in rural areas versus urban areas:

'we don't want [our work] to be looking under the bushes. We want to know exactly who is where, and what they're doing so we can help'

"…one of the differences, if you were to compare us with a city, it would be, "Go and

find somebody in the doorway of Marks and Spencers." And the doorway of Marks and Spencers is fairly well defined. So from the office, you can go and find them, or at least find their sleeping bag. We get, "There's somebody sleeping in a tent on the riverbank. Well, going to find the tent on the riverbank will probably take you two or three hours, first to get there and then to search for the place. And also, try not to fall into the river at the same time'.

Youth Homelessness in Rural Areas

Young people face significant differences in their experience of homelessness generally, and also in rural areas. Finding housing for young people is a bigger challenge, due to age discrimination in the private rented sector, for instance many landlords do not accept tenants under age 26 (St Basils 2021). Cuts in benefits (discussed below) have particularly impacted upon young people and the limits placed on Local Housing Allowance for young people, their restriction to single room rates and the disadvantageous benefits rates for under 25 year olds creates further barriers. We heard reports of young people sleeping rough in rural areas, but accessing support during the day with relatives or friends because there are no services available to them.

Even if young people can get work, they remain at risk of homelessness. Mckee et al's research into young people's employment opportunities in rural areas indicated that they were 'lacking in comparison to larger towns and cities. Not only were job opportunities generally limited, participants highlighted a lack of well-paid, full-time, permanent positions as they perceived most jobs to be low-income and on a part-time and/or fixed-term basis' (Mckee et al 2017 :121).

Limited housing stock makes it extremely challenging for local authorities to find suitable accommodation for young people, or for young people to find accommodation for themselves, as most options are unaffordable, or too large or inappropriate in other ways. The housing stock is more homogenous in rural than in urban areas

with houses generally built for families, not for single occupancy or house shares (CLA 2022) . Many young people are driven out of their local areas and into urban centres or towns where they might have more viable housing options. In the long term, this creates challenges for villages with ageing populations to maintain local economies. McKee et al argue for spatial nuance in housing research overall; existing literature suggests that while young people in general are facing housing and employment precarity, these challenges may be intensified for those living in rural places. Yet, despite this evidence, spatial distinctions are often overlooked in discussions of 'generation rent'.

A support worker told us about an issue with a young couple who were sleeping rough and in the early stages of pregnancy. They weren't married and due to priority need the pregnant woman was offered temporary accommodation. However her partner was not allowed to join her. For this reason the woman turned down the offer of accommodation as she didn't want to leave her partner.

Young families who had children in schools also face difficulties with the suitability of housing offers when it comes to being housed near current schools, support networks and child care. One housing professional told us:

"...people wouldn't want to move schools. Yeah, the actual homeless legislation, it makes it clear that, you know, that isn't really a sufficient reason to refuse accommodation, but, you know, I'm a parent and I wouldn't want my children to move schools, and a lot of people might rely on family for child care. So, you know, it's all very well saying we can move, 15 miles away, but then if your child care is in a certain area and you rely on that to actually be able to go out to work in the cost of putting your child, in nursery would be more than you were using a lot of instances."

Experiences of Rural Homelessness

In this section we focus on what people experiencing homelessness or have recently experienced it tell us about their experiences. We heard stories about isolation and loneliness, shame and resilience. People with experiences of homelessness told us about communities coming together to create support, and contrasting feelings of being 'outsiders', being spat on, tents set on fire and violence and abuse whilst sleeping rough.

Isolation and loneliness

'Rural homelessness is by far one of the worst things...nobody knows you're there, nobody cares you're there, you are on your own and you're just...free..'

Rob* was conflicted about his experience of rural homelessness. His mother had died when he was young and he suffered violent abuse from his step father. After working on funfares and as a seasonal chef he became a carer for girlfriend and suffered several nervous breakdowns. He lived in the woods for 8 years, and felt it was on the one side the worst thing you could experience, but on the other liberating from the stresses of life, no one bothered him and he was able to live off the land. He would sleep in the woods and trap rabbits, but whilst there was a sense of freedom he also felt this sort of life was 'killing' him.

'I made trenches, made sure they were water secure...out there all winters, one winter there was three foot of snow... I had to get up every hour and walk around...and I was really thinking, I can't do this, I can't do this.'

Loneliness and social isolation brought other dangers too. Rob* described how he was mugged by six people and suffered a brain injury and lost his teeth, he described how he then felt the need to 'get off the streets, 'because it was killing me'. For Rob, in addition to isolation he felt that stigma was a big issue ' as soon as someone looks down at you, as a homeless person, and walks off, that is the most degrading thing ever'.

We asked Fred* a man who had experience of homelessness what the best thing to do to help people in his situation would be and he said

"First thing is, talk to them. The homeless get ignored, everything thinks oh they're homeless so they must be druggies and alcoholic and stuff like that...we're not, talk to us, we're lonely, just talking to us is nice sometimes...just don't ignore us".

This participant had found long term accommodation through a charity. Now he was no longer on the streets and felt at home in his accommodation, he didn't count himself as homeless. However he pointed out that he still referred to the community of people experiencing sleeping rough as 'we'.

Shame and Stigma

Another issue Fred described was shame. The shame and stigma people experienced whilst homeless was something that stayed with people long after they received meaningful support.

"People said to me, weren't you scared when you were homeless, and I said yeah, in the beginning I was. There were some days, three or four days, you wouldn't eat...the one thing I didn't like was every night, having to put your bit of cardboard down, and get into your sleeping bag, and you knew people were watching you...people were staring at you, people were watching, that was the worst thing all together, I couldn't stand that".

Another participant Ed* shared his experiences of stigma he still suffers even as he is in supported accommodation.

"To look at me, people wouldn't realise that I'm agoraphobic and that I can't stand being around people, and I've got severe depression...they only see the size of me and because I've been on drugs and where I live and they take an instant dislike to me. But that's not me, that's just something that's happened. They need to get to know the person...don't judge a book by its cover... this is their problem, they are projecting their own image".

Ed described how ultimately the thing that most helped him in the end was 'people believing in me and being there for me and me being able to feel like I could trust someone.'

Case Study **North Yorkshire**

Craven District in North Yorkshire is just south of Richmond, the current Prime Minister's constituency. It has a particular problem with second homes. As you approach Skipton from Leeds on the train you pass a number of locks on the canal, showing how the land rises to the Yorkshire Dales. Factory towns, small houses and tall chimneys are part of the post-industrial landscape, and in the distance is the edge of the dales. Skipton is a small market town that relies on tourism to the Yorkshire dales. Despite a booming tourism industry, the 'economic vitality' of the town reportedly suffers fromthe lack of a young and enterprising demographic (Craven District Council Homelessness Strategy 2020-2025).

5. Drivers of Rural Homelessness

There are a number of factors that emerge from our research that indicate that rural homelessness is a growing and chronic issue that may well become acute in the near future. In this section we consider some of the structural and other issues that impact upon rural homelessness. Taking as our starting point the issues recognised by Cloke et al in 2002, we focus on how rural poverty and the lack of affordable housing contribute to rural homelessness, we then consider the overarching issue of governance of rural homelessness in a section which summarises the relevant local authority responsibilities, welfare provisions and issues relating to crime and anti-social behaviour, including county lines, before turning to recent major events, Brexit, Covid-19 and the cost of living crisis which have had a dramatic impact upon the context of rural homelessness.

Poverty is the single most important driver of homelessness in the UK (Fitzpatrick & Davies 2021) so inevitably rural poverty is a key factor in rural homelessness. Many people are surprised by the existence of rural poverty which, like rural homelessness, is characterised by its invisibility (Cloke et al 2002). This is in part because it is "widely dispersed rather than concentrated in limited geographical areas as in urban "blackspots" (Commins 2004:61) and in part because of its cultural invisibility. 'There is a tendency to regard rural living as idyllic or 'problem-free', or the existence of problems is contested by ideologies which romanticise rural life and the rural environment' (Commins 2004:61). For Cloke et al the unimaginability of rural poverty and homelessness has consequences;

> *Rural spaces can be (re)purified against out-of-place people and practices, either by strenuous denial of the very existence of phenomena such as homelessness, or by purposeful exclusionary practices, designed to move the people, and the troublesome issue, on into its 'proper' urban place (Cloke et al 2002:80).*

Understanding the causes and scale of rural poverty and its distinctiveness from urban poverty is complex and problematic and an in-depth discussion is beyond the scope of this report. But it is important to note that whilst urban poverty dominates policy discourse there are poor people in relatively affluent rural areas of England. Our overview of existing research suggests that people in rural areas can be disadvantaged by limited social and economic opportunity, in particular the lack of educational opportunities and the dominance of low paid work, and by constrained welfare provision. In addition costs such as housing and transport can be higher than in urban areas (Cloke et al 2002, Milbourne 2004, Bernard 2019, Shucksmith et al 2021). This leads to social exclusion – the loss of the ability to connect with the services and facilities needed to fully participate in society. Shucksmith et al's conclusions, from research carried out both before and during the pandemic, that many rural residents are at risk of poverty, while poverty is perceived as an urban issue and that the welfare system is not well adapted to rural lives (Shucksmith et al 2021:4) are very significant in the context of increasing rural homelessness.

Rural employment

Local employment prospects in rural areas are often limited. As Shucksmith et al noted, in many instances 'rural work is not 'good work', with incomes often volatile and irregular' (Shucksmith et al 2021:4). Jobs tend to be concentrated in agriculture, tourism and services, sectors known for lower wages. DEFRA statistics published in 2020 indicate that workplace based earnings are lowest in rural areas in England. In 2020, median workplace-based earnings in predominantly urban areas (excluding London) were £25,400 while predominantly rural areas were lower at £22,900. This is distinct from residence-based earnings because many people living in rural areas work in urban areas in higher paid jobs. In 2020, the median residence-based earnings in Predominantly

Urban areas (excluding London) were £25,100, compared with £25,000 in Predominantly Rural areas. This is significant because whilst on average earnings have kept pace with inflation measured by the Consumer Price Index, which has increased by 21 per cent in the years 2009 – 2020, workplace based earnings have provided much more limited protection against inflationary rises. These figures were compiled before the post pandemic cost of living crisis (discussed below) and could explain why housing professionals believe that there are more people homeless or at risk of homelessness. The discrepancy between work-based and residence-based earnings (i.e. the difference between the earnings of those who work in rural areas and those who live in rural areas but work elsewhere) also explains why poverty can be invisible in rural areas. The problem of lower work-based earnings in rural areas is exacerbated by what might be described as a rural premium – the additional costs of energy, transport and housing.

Energy costs and rural poverty

Individuals are defined as being in fuel poverty if they are unable to adequately heat their homes because of a lack of resources and/or because of the inefficiency of their housing insulation and heating (Boardman 2010). Rural households are particularly susceptible to fuel poverty because many of them are not connected to the gas network. This is due to their distance from the network, which forces them to rely on non-mains gas heating fuels that tend to be more expensive. Additionally, there are concerns about a lack of competition in fuel supply markets in rural areas, as noted by Roberts et al in 2015. The quality of rural housing stock tends to have lower energy efficiency standards with a greater likelihood of such homes being older, detached and built with solid walls so there is less possibility of making meaningful economies. In rural areas there is also a higher concentration of under-occupancy. This leaves 'some smaller households in disproportionately large properties that require excessive heating to maintain adequate warmth' (Robinson et al 2018: 80). Energy costs are also higher in private rented accommodation as

landlords have little incentive to invest in energy saving measures.

According to Roberts et al,

'Despite the higher probability of being trapped in persistent fuel poverty among urban dwellers, the impact of some of the characteristics already known to adversely influence the level of fuel poverty (living in a flat, and living in private rental accommodation) have an even more negative effect in rural areas than in urban areas. Moreover, they also indicate that an individual from an average rural household is more vulnerable to fuel price increases than an individual from an average urban area (Roberts et al 2015:217)

Many participants who had experienced rural homelessness reiterated their struggle to access everyday necessities such as water, food and soap. Basic costs and lack of amenities or public facilities led one of our participants to wash clothes in a river. Below one of our participants compares the luxury of a bed and heating with the harsh reality they live with day to day:

" ...when I would stop in me friend's flat, I actually felt like a queen. I was like, you know, heating, couldn't get over it. A bed, literally a bed, but I tried sleeping in the bed but I got that used to sleeping on the floor. I got off and actually slept on the floor with a blanket. And like I'd just get up and have a shower or bath, I could wash me clothes any time I wanted. But now there's no launderette in the town, obviously, I've had to use the river to wash me clothes in. I've actually gone up to [place], a little shop up town, I've had like £1.20, obviously, I bought like little bits and things like that and food. And I had £1.20 left so I bought a 69p bottle of liquid, just to wash me clothes in the river".

A housing professional described how one elderly man had been discharged from hospital and made contact with the local food bank in Hereford. However when the food bank went to drop off some

supplies for the man in his rural home, they found he had no heating and electricity.

Affordable and accessible transport

As a result of austerity (discussed below) local authority subsidies to local transport have been dramatically reduced. The lack of access to affordable public transport plays a critical role in rural social exclusion and rural poverty (Berg and Ihistrom 2019). It provides a significant barrier to accessing services and employment. DEFRA's statistics on rural accessibility by walking and public transport for 2019 indicate that:

- The average minimum travel time to a hospital was a little over one hour in rural areas, compared with a little over half an hour in urban areas.

- Fewer than half the users living in rural areas have access to places with 5,000 or more jobs within 45 minutes, compared with 91 percent of users in urban areas.

- 51 percent of users living in rural areas do not have access to their nearest hospital (DEFRA 2019)

DEFRA's report also points out that for people living in rural areas, making the same journey by car compared with using public transport or walking, had the effect of halving the average minimum journey times. This considerably reduced the disadvantage experienced by those living in rural areas. It suggests that cars are necessary for a minimum living standard but this means that rural households face significant additional costs in order to achieve the equivalent standard of living as their urban counterparts. Smith et al argue that most rural working-age households would need incomes equivalent to 72% or more of national average (median) income.Those unable to afford a car are most likely to rely on buses. But rural bus services have been particularly badly impacted over the past decade. As one of our survey respondents said, in response to why rural homelessness is different from urban:

"There are less services to start with. Due to distances, transport is a MAJOR issue. Lack of affordable public transport at useful times. Hubs in towns or accessing the Job centre are useless when people cannot get there. Phone and internet can be unreliable, leaving people very isolated. Services will not travel out to rural areas due to cost".

The Campaign for Better Transport also points out that:

- Cuts to national and local funding for buses have led to many services being reduced or withdrawn.

- Bus fares have risen much faster than rail fares or motoring costs.

- In many places buses are no longer frequent or reliable, and traffic on the roads can make journeys slow.

- Government messaging during the Covid pandemic damaged passenger trust in public transport and stay at home restrictions impacted on passenger numbers and bus operator revenue which is causing further cuts to services (Campaign for Better Transport 2023).

The CPRE - The Countryside Charity, argues that England should recognise a universal basic right to public transport, backed up with guaranteed service frequency standards, and the government should fund local transport authorities to achieve that level of service. Our research confirms that poor public transport has a very negative impact on rural homelessness.

One housing services officer told how the centralisation of resources and cost of public transport caused issues for keeping employment:

'...to rely on social housing, when it is such a finite resource, is very, very difficult in those areas and we have ever sympathy for those particular people, because we sometimes get people who split shifts, for example.

Good practice example:
Farmhouse accomodation

Turning Tides has also leased a five bedroom farmhouse in 100 acres of National Trust land from another charity Lorica. This unique setting has meant that a person they supported had a solution to entrenched rough sleeping. Adrian who experienced homelessness after a family and mental health break down and slept rough in local woods for 4 years, now has a room which looks out over the woods/fields from the farmhouse. Adrian has told them that it calms him when anxious and if becomes stressed he can walk straight out into the peace of the woods. He has been there over a year and has said that he feels the most settled he has been for many years.

Case Study **Fred**

Fred* described how he disguised himself when he was sleeping out on the streets by wrapping his head with scarves. He was afraid someone would recognise him. Fred* became homeless after an amicable divorce. He moved into hotels, then as his savings dwindled, bed-and-breakfast, then sofa surfing, hostels and eventually found himself sleeping on the streets on a piece of cardboard with a sleeping bag. He slept on the streets of a large city where he used to work on the public transport network. He refused to beg but was grateful when he woke up with a bag of hot food, a coffee or a sandwich next to his head. For him, the worst thing was the loneliness and lack of human connection. He eventually moved to a rural area with the help of a charity and found friends and a community. Now he likes the ruralness of the area, the peacefulness and waking up being able to see a badger out of his window.

* Names have been changed to protect people's identities.

So they might work a morning shift. Go home and then go back out and if they are homeless our temporary accommodations is in the main centre. So if they had to go into our temporary accommodation and they didn't drive, for example, then they would just have to give up their work because there's no way that public transport would allow them to make those kinds of journeys as well as the cost burden as well.'

As Cloke et al pointed out in 2002, whilst 'homelessness is often about far more than a lack of housing, housing remains fundamental to its resolution. This is particularly the case in rural areas where there are quite simply not the housing options that exist in urban areas' (Cloke et al 2002:194). There is extensive evidence to suggest that the problems of rural housing costs and availability have intensified in the twenty years since Cloke et al's work was published.

Housing is much less affordable in predominantly rural areas. DEFRA statistics published in May 2022 suggest that the average lower quartile house price was 9.2 times the average lower quartile earnings, compared with 8.0 times in predominantly urban areas (excluding London) (DEFRA 2022). The Rural Services Network suggests that excluding London, the average house purchase price is £90,000 higher in rural areas than it is in urban areas. (Rural Services Network 2021). The most affordable form of home ownership, flats are rarely available in rural areas. Flats in rural areas comprise only 4% of the overall housing stock as compared to 63% in city centres (CLG English Housing Survey), Rather than flats developers focus on building larger homes on new market developments, because these secure a better financial return. The constrained supply of smaller homes, especially those that would be affordable or suitable for supporting living, compounds the challenges facing vulnerable and low-income households with little or no realistic housing options in rural areas.

The scarcity of affordable housing in rural areas is exacerbated by ownership of second homes and the increase in holiday rentals, particularly Airbnb. The CPRE - The Countryside Charity's

Chief Executive argues that there must be a 'government response to the fact that our rural housing supply is disappearing into an unregulated short-term rentals market that simply didn't exist six years ago.'

A Shelter blog provides a pithy summary of the crisis in home ownership in rural areas:

In many rural communities, the market for housing has become divorced from local people and their incomes. Homes are sold for as much as people are willing and able to pay for them. In theory, this means that lower average rural wages should be reflected in lower rural house prices. But in much of the countryside, the market serves primarily second and holiday homeowners and retirees, who have far more to spend on housing than local workers. The market doesn't try to be affordable to local people, because it has plenty of demand from out of the area to feed on. As a result, house price to income ratios are out of control – 13:1 in Horsham, 10:1 in Central Bedfordshire, 9:1 in Cornwall and South Lakeland. (Rose Grayston Shelter blog July 6th 2018)

With home ownership out of the question for many in rural areas, private renting is often the only option. But it has become increasingly inaccessible to those on low incomes or benefits. Whilst rental prices in general flatlined following the global financial crisis of 2009, real incomes fell, making private renting increasingly unaffordable. More recently rural rents, alongside all other rents, have increased since the pandemic. The cost of living crisis, increased interest rates affecting landlords' mortgages together with some evidence of a decrease in the supply of rented homes and increase in demand have all contributed to higher rents. Kovia Consulting, in research commissioned by the Rural Services Network found that:

In 2021, on average, the percentage of monthly earnings spent on rent showed very similar levels of affordability in predominantly rural, predominantly urban (exc. London), and urban with significant rural areas (34%).

However, for households with the lowest income, rent was less affordable in rural areas. Workers in the 25th percentile for residence-based earnings spent 47% of their earnings on rent in predominantly rural areas, compared to 43% in predominantly urban areas (Rural Services Network 2022:20).

In Cambridgeshire, one of our fieldwork sites, the university brings students and an elite middle class into the central urban area. This leads to high house prices and high rents which, when combined with the lack of social housing, means that many are priced out of the area. Support workers, usually earning around £24,000 a year, described this as 'social cleansing'.

Even for those who manage to access private renting, their housing situation remains problematic. McKee et al demonstrate their existence is stressful. Private renters experience a lack of control and insecurity which 'has significant impacts on subjective well-being. Security is pivotal to transforming a house into a home. But it also provides an important 'foothold' enabling people to get by, and get on, in life' (McKee et al 2020: 1477). In addition, 'the financial stress individuals were placed under to maintain their tenancy was also clear, with the relative cost of renting further contributing to people's precarious existence' (McKee et al 2020:1477).

There is limited social rented housing in rural settlements. According to the Rural Services Network 12% of the rural housing stock in England is social housing compared with 19% in urban areas (Rural Housing Alliance 2016). The Right to Buy initiative has had a particular impact. The Rural Services Network found that in rural areas only one replacement home was built for every eight homes sold and those replacements are rarely in the same settlement (Rural Services Network 2021). This is particularly problematic for those with strong attachments to place because of family connections or other reasons.

Lack of emergency and move-on accommodation

People who are homeless require emergency and move-on accommodation but this is very limited in many rural areas and providers have to make difficult choices.

"We've had to make people homeless in order to house homeless people".

A support worker explained that in their area the local council lacked housing stock and a large number of homeless people were temporarily housed in B&Bs and hotels. A local church had run a night shelter during the winter months for those sleeping rough, but there were problems once the church was no longer able to provide this service. To provide this service itself, the council then had to convert one of their seven room supported accommodation properties into a night shelter with 17 beds. Consequently, a house which had been providing long-term support for seven people had to be used as a night shelter in order to accommodate up to 17 people nightly. This meant moving seven people out of their homes and into Bed and Breakfast - an expensive and unsatisfactory alternative.

One support worker in a city hostel told us about the lack of availability of services in rural areas:

"We had this one lady who had lived in [village] her whole life, its a village in the county that is quite rural. Essentially her relationship with her husband had broken down. And so I think she became homeless in that area, but there just weren't any services there to support her, so she came to us".

A housing officer told us about the issue with Section 21 evictions in rural areas:

"people are left with eight weeks and they might have lived in a property for 15 years to then try and find somewhere else to live and if that is in a rural area, then you know, there should have more time to try and find accommodation where they want to be... because to put it bluntly, there are some areas

in this district where, you know, someone's more or less got to die before that property comes up. You know, it's heartbreaking, because there's, you know, there young families fighting for accommodation in areas where they just can't get rehoused.'

Planning, development, and building

There is an urgent need to improve the supply of housing in rural areas which is affordable for those earning local wages. Mechanisms for delivery of homes that are genuinely affordable in rural areas are limited by scale, opportunity, and conservationism.

Planning

The National Planning Policy Framework (NPPF) sets out government policy on the development and building of new homes - this includes consideration of rural matters. Local planning authorities must operate their own planning policies within the constraints of the NPPF together with any relevant additional guidance. The NPPF provides local authorities with 'carrots and sticks.' The carrots are financial incentives, vital for local authorities that are still accommodating the impact of austerity and are otherwise reliant on local taxation or central government funding. Sticks include a controversial provision, the presumption in favour of sustainable development, which, in lay terms, means allowing more speculative building to make up any shortfall in homes necessary to meet house building targets.

Affordable housing

Government policy acknowledges the affordability challenge of living in the countryside and the need to enable exceptions to secure land for affordable housing developments. Affordable home ownership is supported through schemes such as Help to Buy and Right to Shared Ownership, with large scale public subsidies above the investment in affordable and social rented homes targeted at lower-income households. A report by the House of Lords Built Environment committee calculated that the Help to Buy scheme would have cost £29 billion by its conclusion in 2023. This is a figure more

than double than the equivalent invested through the Affordable Homes Programme during the same period.

The 'affordable rent' tenure was introduced in 2008 and marked the shift towards lower levels of public grant for Registered Providers (Housing Associations). 'Affordable rents' means that rents set by Registered Providers are set at 80% of market rent, which is 15-25% higher than a social rent for a comparable property. These rent levels are necessary to support the financial viability of development and support higher levels of debt that Registered Providers have secured to fund investment in new homes, at historically low interest rates. But there is a fundamental flaw to the policy. In rural areas the low level of household income makes these 'affordable rents' unaffordable. There is state support available for households unable to afford the higher rents, either from housing benefit or the government's new single welfare payment system Universal Credit. However welfare support for rent is limited to a threshold known as the Local Housing Allowance. This is determined locally using (since 2009) the lowest 30th percentile of the rental market. In many rural areas this threshold is insufficient to cover private rent levels and in high value areas even falls below affordable rent levels. The repeated freezes to LHA levels in recent years have further reduced the support available. Given the level of demand for affordable housing, eligible households not fortunate enough to secure a home have been supported within the private rented sector, but again with support capped at the Local Housing Allowance. This means that substantial public sector funds have been paid to private landlords, which the National Audit Office calculated at £9.1b a year in their 2021 Private Rented Sector report. As in urban areas, the most common policy approach to securing affordable rural housing is onsite provision from market-led development. The mechanism, known as S.106 delivery (Town and Country Planning Act 1990, as amended), secures a quota of affordable homes as a condition of planning approval. These houses are generally then owned and managed by a Registered Provider. However current policy provides that

a proposed development must comprise at least 10 houses before the s.106 quota applies, unless the settlement is as a Designated Protected Area when this can be reduced to five or fewer. However almost 70% of small rural parishes (those with populations below 3,000) are not classed as Designated Protected Areas, reducing the value of the mechanism. Almost invariably the market sites made available in rural areas are small. Anecdotally the consensus is that there is a degree of 'gaming' by developers to ensure that thresholds are evaded and onsite provision of affordable housing avoided. Developers also argue that there is an absence of Registered Providers willing to purchase just a few homes and/or that s.106 requirements will make schemes unviable, in their efforts to avoid providing affordable homes, instead offering to pay a commuted sum. Nonetheless most affordable rural homes come forward via the s.106 route, with 4,446 being built in 2021-22 (DLUHC – LA Statistical Return Data). However this represents only 8% of overall affordable housing delivery nationally and is considerably lower than the level of rural population, which stands at 17.6% (DEFRA Statistical digest of Rural England).

The other, more rurally focused mechanism for providing affordable housing, is the Rural Exception Site Policy which is common to most adopted local plans. Sites are permitted across the countryside, including on greenbelt, Areas of Outstanding Natural Beauty, and National Parks. The principles of the policy have remained broadly unchanged since its inception in 1988, allowing for small scale mixed tenure development on land outside of, but adjacent to existing planning boundaries – usually low-grade agricultural sites.

Rural Exception Sites are appraised based on a proven need for affordable homes locally and, as a rule, developed with a high degree of community engagement. Once planning is secured, arrangements are made to safeguard the affordability of the homes into the future and a degree of preference is given to local households when allocated. Over recent years, cross-subsidy has become more common to support the viability of rural exception developments which often have high build costs associated with design, scale, and infrastructure. Land values are negotiated within a range that allows for a modest uplift on agricultural use but remains reasonable and supports proposals that the local planning authority consider to be viable and proportionate. Rural Exception Sites are mostly developed by Registered Providers, with 548 affordable homes built using the policy in 2021/22 (DLUHC – LA statistical return data). Along with quota sites, they are the mainstay of affordable rural housing delivery with both mechanisms key to achieving the 10% affordable housing target reintroduced by Homes England in 2020.

Rural proofing

National rural proofing of housing and planning policy is limited and reflects the restrained role that the government's rural agency, DEFRA, can realistically play, despite its endeavours to hold policy shapers and makers to account. The continuation of the Right to Buy policy and the sustained focus on homeownership will inevitably limit the effectiveness of any efforts at rural proofing housing policy. Some local authorities have responded to the lack of affordable homes in rural areas by devising restrictive housing allocations policies, taking advantage of freedoms within the Localism Act 2011. As with national housing policy, the extent to which local authorities rural proof housing allocations varies, with households unable to afford to live in their home rural communities ending up winners and losers depending on how policy genuinely sought to accommodate the affordability of rural living.

Constraints on the delivery of rural affordable housing.

Despite some of these successes, overall affordable rural homes have not been delivered on anything near the necessary scale. There are three main reasons for this. The first is local opposition. Anyone hoping to build even a handful of new homes, market or affordable, in smaller rural communities is likely to face vocal and coordinated local objection. Zealous conservationism and a culture of buying into the stigma associated with affordable homes and those that live in them are often at the core of such opposition.

The second challenge is securing a site. Housing delivery favours urban and larger settlements, where strategic or bigger scale sites can better meet home building targets. Smaller rural communities are quickly written off as not sustainable locations for development or fall outside of local planning authority land-supply arrangements. As a result mainly opportunities are limited to windfall, and even these often progress slowly due to limited local authority housing and planning capacity. Enabling a Rural Exception Site is not straightforward. Success is reliant on securing a site that

a. lends itself to building homes

b. is agreeable to planners and

c. has the support of a landowner willing to sell for a reasonable uplift of current use value.

The third challenge is financial viability more generally. Scheme viability is impacted by

a. Scale

b. extent of infrastructure necessary to connect homes to services

c. design and build quality requirements

d. the need for and cost of environmental mitigations

e. the level at which rents can be afforded, public grant agreed, and loan borrowing applied.

The extent to which these variables can be applied to a development, either through policy or what is practical on the site, will impact on the willingness to invest sparse resource in schemes that show limited value for money.

Good practice example:
Warm Spaces, Churches and Food Banks

In the winter of 2022, amid the energy and cost of living crisis, communities found spaces to invite people inside to keep warm. In a number of our field sites 'warm spaces' were opened at churches, community centres, charities and cafes. One Church, aimed to 'provide a safe, warm space', and volunteers served soup and bread for free at lunch time, then sold refreshments and cakes afterwards. Another Church hall had a sign outside inviting people in stating 'it's ok not to be ok'. Warm spaces such as churches, libraries and charity run cafes provided spaces for people to sit and sometimes get a hot drink or meal. We also found that communities were doing a lot together to support each other through times of need, in particular through food banks and churches where people gathered for purposes way beyond food. In two areas the food banks also tried to visit rural areas with mini vans or buses to provide for remote communities.

Food bank workers often consist of retired social workers and health workers, who volunteer and offer support, advice and help to people in need, including help to complete welfare benefit applications and informal counselling. Many workers reported that the demand for food banks had doubled or tripled in their areas, in particular families with children, and that there has been stark increases in people with learning disabilities needing support as they are not reaching thresholds for social care. In one area a food bank worker told us that 'People come here to cry about childcare, housing, money, food and mental health. We get an awful lot of tears'.

6. Contemporary issues

Welfare cuts and austerity

One key change over the years between Cloke et al s research published in 2002 into rural homelessness and the current conditions is the impact of the decade of austerity which followed the global financial crisis of 2009 and the election of the Coalition government in 2010. Austerity measures included restrictions in local government funding and wide-ranging cuts to benefits. As Hoolachan et al observe, 'these reductions, along with the insecure labour market, have left some at risk of greater stress and hardship; forcing them further into poverty' (Hoolachan 2016: 76). There are several strands to welfare cuts worth noting in the context of rural poverty and rural homelessness.

- The institution of the benefit cap, designed to ensure that out of work benefits do not exceed average weekly wages, the shift to uprating benefits via by the consumer price index from the previously used retail price index and several years of below CPI increases have all had a detrimental impact on benefit levels

- Benefits for housing costs have been considerably limited as a result of Local Housing Allowances being limited to the 30th percentile of local rent levels as opposed to the median and facing year on year freezes in its value. Additional factors include the increased deductions for non-dependents, benefits limited to shared accommodation rates for under 35s and the introduction of the bedroom tax

- The introduction of Universal Credit designed to increase incentives to work and the intensification of the conditionality of benefits

- Reduction of state support for young people particularly the abolition of the Child's Trust Fund, Educational Maintenance Allowance - a means tested benefit designed to support young people with the costs of staying on at school, and tripling student fees to £9,000.

- People who are subject to immigration control are generally prevented from accessing welfare benefits including Universal Credit and from housing assistance. This bar, known as 'No Recourse to Public Funds' was extended in 2012 and was recognised by the House of Commons Committee on Housing Communities and Local Government as a serious obstacle in responding to street homelessness post the pandemic (discussed below).

Another casualty of austerity was Supporting People. Launched in 2003, in its original form it provided a £1.8 billion ring-fenced grant to local authorities for the purpose of funding housing related support services to help vulnerable people live independently. It was used to support a wide variety of provision including refuges, care leaver support, support for people leaving institutions and support for people who have been living as homeless to set up their own home. However in 2009 the ring fence was removed from the grant which enabled local authorities to spend their Supporting People allocation as they deemed appropriate. In the 2010 Spending Review significant cuts were announced to the programme. This combined with the cuts to local authority funding set out below has had a serious impact on the provision of services that helped prevent and/or assisted those living as homeless or at risk of homelessness.

Central government funding of local authorities has fallen considerably since 2010 which explains in part why Supported People funding became diverted from housing support. The National Audit Office reported in 2018 that there had been an estimated 49.1% cut in real terms to the entire Supporting People program between 2010 – 11 and 2017 – 18 (NAO 2018). Research by WPI Economics

and St Mungo's, found that council spending on support for single homeless people specifically in England fell by 53% between 2008-9 and 2017-18, and argued this was a contributing factor to rising levels of rough sleeping in this period. In a 2018 LGA briefing it was noted that these cuts happened at the same time as growing demand for services and additional burdens have been imposed upon local government. It concludes that 'Leaving councils to pick up the bill for unfunded government policies, at the same time as managing spending reduction and such growing demand for services, is unacceptable' (LGA 2018).

Already existing problems were considerably impacted by the pandemic which had a dramatic impact upon revenue, for instance commercial income from car parks and leisure centres fell, and there were difficulties in securing rental income from commercial property. The result has been significant cuts to the discretionary services provided by local government whilst it prioritised as far as possible statutory and more acute services. A 2022 report by the Institute for Government concluded that, in the last decade,

> *The scope of the state has shrunk locally, across England. Within smaller budgets, councils have had to concentrate spending on statutory and demand-led services such as homelessness, waste collection and concessionary bus passes. This came at the expense of preventative and universal services such as children's centres, subsidised bus routes and housing programmes to help vulnerable people to live independently (Atkins and Hoddinott 2022:4)*

Research by Watts et al provides a close examination of the impact of austerity on homelessness prevention services run by Newcastle city council and its partners. They observe that despite great efforts by the local authority, and an impressive track record of homelessness prevention, 'The current context is particularly pernicious in this regard, with local authority efforts to prevent homelessness directly limited by national policies that increase homelessness risk and restrict local authorities'

capacity to respond effectively to it (Watts et al 2019:144).

Covid-19

Glass et al, in the context of a wider research project into rural lives, produced a report in 2021 on the consequences of Covid-19 and lockdown on those living in rural areas. They concluded that:

> *The national lockdown that began in March 2020 delivered a huge shock to rural economies and societies, most obviously through the temporary closure of many businesses and the loss of earnings to employees, self-employed and freelance workers. These impacts reinforce the importance of diversifying rural economies that rely heavily on tourism and hospitality, and of promoting 'good work' which offers a reasonable, secure income (Glass et al 2021:2).*

Their research provides an important context to our own project. Our findings focus on the consequences of policy initiatives relating to rough sleeping and private renting.

Everyone in

Covid-19 presented particular risks to homeless populations because of the difficulties of self-isolation in hostel accommodation, and the vulnerability of homeless populations who experience multiple morbidities and are particularly susceptible to respiratory illness (BMJ 2018). In response, at the very beginning of the first national lockdown, on 26th March 2020 the Ministry of Housing, Communities & Local Government launched its Everyone In initiative. This required local authorities to provide Covid-19 secure accommodation to rough sleepers and those at risk of rough sleeping to protect public health and control transmission. Everyone In is generally celebrated as a success. The National Audit Office estimated 33,139 people were brought into accommodation as at end of November 2020 (including those who have no recourse to public funds) and Covid-19 infections and deaths were relatively low with only 16 deaths of homeless

people identified as involving COVID-19 in the first lockdown (National Audit Office 2021). There also appears to have been a quite surprising amount of success in moving people from hotels and into settled accommodation, with an estimated 26,000 people being housed either with a private tenancy providing a minimum of six months security or by being offered supported housing or social housing.

However Everyone In raised some important issues which have long term implications for housing and homelessness policy:

- Whilst the accuracy of the numbers of people helped can be debated (LSE 2021) there is no doubt that the scale of rough sleeping and those at risk of rough sleeping is much greater than the government had previously estimated.

- There was an increase in first time people sleeping rough during the pandemic probably as a result of people being evicted from lodgings or sofa surfing because of lockdown and those people who lost their jobs because of the pandemic and who therefore could no longer afford housing. Whilst it was anticipated that this increase would be temporary, the cost-of-living crisis (see below) that followed the pandemic suggests that the problems may be more long term.

- Dealing with people who have No Recourse to Public Funds has proved problematic. The first iteration of Everybody In explicitly included those with no recourse to public funds, but moving people who have no recourse to public funds into settled accommodation is problematic because they cannot claim benefits and are likely to struggle financially to move into the private rental. The House of Commons HCLG Committee concluded that 'No recourse to public funds has been an obstacle to reducing rough sleeping for a long time: the pandemic has just shone a spotlight on its impact. If the Government is serious about meeting its manifesto commitment to end rough sleeping by 2024, it must reform the no recourse to public funds policy'

(HCLG 2021)

- Shortage of affordable housing is an inevitable blocker in finding move on accommodation.

The Public Accounts Committee, in a report published in March 2021, whilst noting the remarkable success of Everybody In in limiting infection transmission and deaths among a very vulnerable population, concluded that

This initiative has also exposed gaps in the Department's approach to tackling rough sleeping. The Department has a target to end rough sleeping by May 2024, but does not have a strategy for achieving this outcome or maintaining it once met; nor does it have a clear understanding of how it will measure and report on progress. The scale of effort required to achieve this target may also be greater than previously suggested: the number of people accommodated in the first ten months of Everyone In (37,430) was nearly nine times the number of rough sleepers recorded in the Department's last official snapshot before the start of the pandemic (4,266). This also raises further questions about whether the Department's funding of local authorities to achieve its objectives is adequate and sufficiently long-term

For our professional interviewees responding to Covid 19 was a watershed experience.
'I suppose what Covid has done is demonstrate that if you throw money at the problem, homelessness can be resolved, because that's the issue.' (Support Worker,)

During Everybody In, some support workers found that without 'tolerance' and understanding that came through spending time with people and wrap around care, it was impossible to keep people safe. The usual policies around the behaviour in temporary and supported accommodation were too tricky for people to adhere to, particularly when service users had complex needs and were not used to living in their newly granted accommodation due to long periods of time spent sleeping rough. It was only through tolerance and

understanding, perhaps more afforded during the unfamiliar period of the pandemic, that support workers were able to maintain people in their accommodation.

'There's only a certain amount of time we can actually dedicate to that and support we can put in place. And that's been my argument, is we're – we've done great throughout Covid. And we've housed a lot of people who've never been housed before. But if we don't keep them in their accommodation, all of that doesn't matter…and some of that actually requires almost that you go and live with them and be their buddy'

I think we're tolerant because we understand the big picture of all of the things that go on around them. We don't look at them in isolation… we see all the other services that are involved. So we understand the big picture…it makes us more tolerant, because we really know the whole thing. We're not just seeing that person in isolation as a housing officer' (Support Worker)

Private renters

It was not just those who were sleeping rough who were impacted by Covid-19. People renting in the private rented sector were also vulnerable because of their limited security of tenure. In most cases, outside of the initial six-month period or where there are fixed term agreements, private sector landlords can evict someone providing them with only two months' notice. Lockdown and furlough inevitably placed private renters at a high risk of eviction. However, Robert Jenrick's pledge on twitter that, "no one should lose their home as a result of the coronavirus epidemic" gave a strong indication that private renters would get protection[4]. What the government did was to ban evictions except in specific cases during the pandemic period. The exact details of the eviction ban differed at different stages of the pandemic The Housing Communities and Local Government Committee in its review of the eviction ban noted housing lawyers' criticism of the complexity of the legal adjustments (HCLG 2021:23). It recorded

evidence from Giles Peaker, Partner at Anthony Gold Solicitors, who criticised the 'hotchpotch of interventions and last-minute secondary legislation that is very hard for anyone to grasp'. What particularly concerns housing advisers is that there is nothing in place to help renters who built up arrears during lockdown. This may well mean that there will be an increase in homelessness in the near future as private renters cannot afford to reduce their arrears. As Simon Mullings, representing the Housing Law Practitioners' Association (HLPA), pointed out to the HCLG, there is a lack of "long-term strategy about how to protect the sector".

The cost of living crisis

The cost of living crisis has rapidly succeeded the pandemic as a significant risk factor in homelessness. For a number of reasons, most particularly the war in Ukraine which has caused energy and grain shortages, inflation is high and there has been a rapid increase in the prices of basic commodities (ONS 2023). Rural households may be more affected by current price rises than other regions because of rural vulnerability to high fuel costs, high food prices and high transport costs, all of which we have discussed above. The Rural Services Network, which commissioned research into the differential cost of living between rural and urban areas (Rural Services Network 2022) is now collecting data from rural residents about the impact of the cost of living crisis on them. Suffering from the rural cost of living? Make your thoughts known in household survey - Rural Services Network (rsnonline.org.uk), We expect the results of the survey to confirm that rural households are significantly more impacted than urban households.

Adult social care

Adult social care faced a number of problems prior to the pandemic. Over the decade between 2010 and 2020 research by the Kings Fund identified that the key problems comprised means testing, catastrophic costs, unmet need, poor quality of care, workforce pay and conditions, market fragility,

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[4] Robert Jenrick on Twitter: "Thank you @Shelter - no one should lose their home as a result of the #coronavirus epidemic." / Twitter

disjointed care and the postcode lottery and argues that they have all been exacerbated by Covid–19 (The Kings Fund 2020). Since the pandemic there are particular problems around unmet need and there is no long term solution proposed to the staffing crisis in adult social care. There appears to be little data on particular problems of Adult Social Care in rural areas, although it is established that the demographic in rural areas is older, which means that care needs are more likely (Skinner et al 2021). Shucksmith et al suggest that in rural areas adult social care is placed under particular strain due to the 'greater distances that care workers need to travel, staff shortages and the higher costs of formal provision at home' (Shucksmith et al 2021:18).

During our research we spoke with social workers in rural areas where they explained that the system is at the brink of collapse, and they can only provide support to the absolutely most acute cases. Many of their clients do not meet the threshold requirements for adult social care and therefore the demands on NGOs and local organisations to support people at risk of or experiencing homelessness who have complex needs is far greater. People working in rural food banks told us that those accessing their services had social care needs far beyond the need for food. Many provided emotional and wellbeing support, and many reported undiagnosed or unsupported mental health needs. In one location a retired social worker unofficially supported people with care needs through the food bank on a weekly basis as a volunteer.

Brexit and migration

In 2018 Crisis and Homeless Link commissioned a report on the potential impact of Brexit on homelessness as a policy area. The report makes several important points; 'The underlying causes and the harm caused by homelessness do not distinguish by nationality, so nor should support for people at risk of homelessness and identified the risk that EU nationals, particularly those who are homeless may fail to apply for settled status or temporary residence permits.
It identifies several risk factors, for people failing to

apply, it could be because 'they are unaware of the need to do so, fear being rejected, are mistrustful of interacting with officials, or are unable to afford the fee (no more than the cost of a UK passport – currently up to £85 – a significant sum for those on low or no income). The fact that the application process is expected to be solely available online may also prove a barrier for EU nationals that are homeless with no internet access or low computer literacy'.

Our findings revealed an increase in migrants within the homeless population. In one area the local authority noted an increase of European migrants who were now sleeping rough as they did not gain settled status following Brexit, and consequently do not have recourse to public funds. A housing and homelessness manager from another local authority told us that, 'The EU/Brexit legislation and the Citizen's Rights Act has changed the way that we deal with EU migration. So there are people now who are finding themselves destitute for brand new reasons. It's kind of that we've never had to deal with before, so it has made things more complicated'. Some of our respondents also raised concerns regarding increases to the number of people from Ukraine displaced by the war whose temporary housing with British families has come to an end. Organisations and local authorities across the country are now warning that there may be a drastic increase in migrant populations at risk of homelessness.

Case Study **David**

David*, a 47-year-old man with a replacement hip and severe mental health issues, described how he felt ashamed to use a food bank, whilst also receiving social welfare benefits. He had to spend most of his benefits that month on a new pair of glasses so he could see, as his eyesight was so bad he had taken a few falls. He had disagreements with his mother whose house he had been staying in and now he was sleeping rough with only £20 left for the month. He explained that the price of food was going up in the supermarkets and the money wasn't going far so he went to the food bank. He explained his desperation:

'It was my eyes or my health…I just said I'm with a doctor and everything now and the doctors that want to refer me to the mental health and things like that because I've tried to commit suicide '

He was able to receive food packages from the food back and was regularly checked on by one of their volunteers. However, he described how he wasn't eating enough and his stomach was swollen. The doctors had sent him to the hospital to check for bowel cancer, but he didn't have the money to get the train to the hospital, so he would have to jump the fare, which he didn't like to do. David expressed guilt and shame for using the food bank, having no choice but to spend his benefits on new glasses, and the thought of having to jump the train.

* Names have been changed to protect people's identities.

7. Emerging Themes

Inequalities, intersectionality and social injustice

In this section we draw together some of the key themes that have emerged from this research and make suggestions for future research priorities. The themes that we would like to emphasise are:

- Inequalities in rural areas may not be obvious to the casual visitor or the resident who works elsewhere but they are deeply embedded, have been exacerbated in recent years and place rural residents for whom home ownership is out of reach at serious risk of homelessness.

- The intersections of disadvantage and vulnerability with rurality intensifies the risk of homelessness and makes homelessness much more difficult to respond to

- Whilst homelessness in rural and urban areas are distinct problems there is significant movement between the rural and the urban and a clear interdependence between the rural and the urban which suggests there are policy implications and opportunities for innovation

- Whilst there is clear evidence in our research of the individual resilience of those experiencing homelessness there is a particular shame and stigma attached to being homelessness in areas of affluence which can intensify the barriers to support.

- Rural homelessness and the precariousness of rural housing provides a useful lens for us to understand inequalities and social injustice more generally

Inequalities

Our review of the literature and our field work has demonstrated the embeddedness of rural poverty despite its invisibility. Traditional employment in rural areas is poorly paid and often seasonal. More well paid employment is difficult to access because of limited transport options. There are also limited educational and training opportunities. The literature also discusses the rural premium, the additional costs that those who are resident in rural areas face, such as higher energy costs and more expensive fuel and food costs. Housing is a particular source of rural inequality. House prices are unaffordable for those who are working locally who face competition for housing with those who commute for work to rural areas as well as competing with those who buy houses as second or holiday homes. As a result of the reduced supply and high demand rents are high. Yet rural poverty is invisible because many people living in rural areas have high incomes from working elsewhere. The problem of rural poverty has been exacerbated by welfare cuts and by cuts to local government funding. Local government has responded by cutting funding for discretionary services, yet these are the services that sustain rural populations and their absence has been acutely felt.

The pandemic hit rural economies hard, and the cost of living crisis appears to be having a particularly deleterious impact. So the rural poor are in jeopardy and our research shows that this has contributed to the increase in rural homelessness. Whilst homelessness is often the consequence of poverty and structural disadvantage there can be multiple compounding factors. The interface of these factors is described as intersectionality and is discussed below.

Intersectional disadvantage

Our research has shown that within homelessness provision in rural areas, there is a lack of services for groups who are known to be more likely to experience homelessness. For example, there is inadequate provision for people who identify as LGBTQ+ (Tunaker 2023), those from ethnic minority backgrounds (Bramley 2022), people with disabilities (Housing Rights Watch 2018) and migrant populations (Bramley et at 2021). Specialist support is most likely to be located in

Case Study **John**

John* is 27 years old and has been rough sleeping for 3 months. He is currently sleeping in a tent on private land. He is type 1 diabetic and insulin dependent, and he has incontinence issues as a result of diabetes. He needs to keep his diabetes medication in a fridge and he has mental health issues as a result of his diabetes and rough sleeping, so he requires specialist mental health support. The local authority goes out to see him regularly and offers support, but he does not want to take up offers of support that are too far from his own local area. He does not feel confident to travel far distances due to his incontinence and being too far away from his support network.

He gets fresh water and use of a fridge from the landowner whose land he is sleeping on and buys food from a local shop but this is expensive and takes up a lot of his benefit payments. His outreach worker has explained to us that John's situation is challenging as John's own needs to stay local and familiar to his area, as well as his need for a self contained home/flat, along with his age reducing his eligibility for higher rates of housing benefit mean he is excluded for a longer period of time as the system is set up such that out of area placements for temporary accommodation are deemed as appropriate despite his clear need to stay as close to the local area as possible. His outreach worker has explained that medical professionals are very concerned for his wellbeing as his ability to manage his health in a rural location are reduced without access to affordable transport.

His outreach worker was able to negotiate temporary accommodation centrally in the end and a private landlord sourced appropriate accommodation - the local authority covered any shortfall in rent and John's benefits were maximised so he could afford the diet he requires and became eligible for higher rent benefits as a result of receiving Personal Independence Payments (PIP). His outreach worker also managed to apply for a free bus pass based on his disability.

* Names have been changed to protect people's identities.

urban centres, which in some cases means several hours journey from a rural location. This makes minorities even more vulnerable in rural areas, and less likely to seek or acquire appropriate support. As one of our survey respondents explained:

> *"As a mainly rural area we do not have access to many of the services that urban areas have. Decreasing funding tends to centralise provision in urban areas."*

Nearly 16% of our survey respondents highlighted that mental health support services are missing in their area. 28% of our respondents also noted that what they need in order to tackle homelessness in their area, aside from affordable housing and more homelessness services, is increased funding for prevention services.

Another respondent said:

> *"Urban areas tend to have a network of agencies working closely within a close proximity to provide the support required across a range of issues. This is much more difficult to achieve in rural settings due to the area it would have to cover and the difference in population density".*

Another summarised the issues in rural areas compared to urban as follows:

> *"Less specialist support for addiction and mental health crisis. Little or no supported accommodation. Little or no 16/17 year old accommodation. Public transport makes accessing work, health and support services expensive".*

The Covid-19 pandemic revealed existing 'multiple and interrelating structures of inequality' (Maestripieri 2021: 1) that together make some people more susceptible to homelessness than others. Homelessness prevention needs to focus on groups that are likely to experience marginalisation, microaggressions and discrimination in society. Unfortunately, these groups are least likely to find specialist support in rural areas. Our research respondents have also

highlighted the specific needs and concerns of the Gypsy/Traveller communities who experience marginalisation and multiple discriminations (Greenfields 2017 Richardson and Codona 2016)). The 2002 Homelessness Act requires each local authority to consider the needs of Gypsy/Traveller community in its homelessness prevention strategy However, according to many of our respondents in rural areas, this community remains at high risk of homelessness and lacks support.

Our research suggests that problems faced by the elderly and the young are exacerbated in rural areas. It also highlighted that women's homelessness is an increasing demographic within rough sleeping, often linked to domestic violence and abuse (see Bretherton and Pleace 2018), In rural areas women are likely to be even more invisible/hidden, and less likely to find the support they need. 7% of our survey respondents suggested that domestic violence and abuse is one of the three main drivers for the increase in homelessness in their area.

The rural and the urban

This research is highlighting the causes, the responses to and experiences of rural homelessness. There are three points we wish to make here. First in no way are we suggesting that there should be competition between the rural and urban for scarce resources. Our point is that policy makers have overlooked rural homelessness because of its invisibility and it needs to be recognised as a significant and distinct social problem. Second, we understand that urban and rural homelessness are connected in a multiplicity of ways, not least because there is a movement of those experiencing homelessness and housing precarity from the rural to the urban and vice versa. We did not have the resources in this project to document those journeys but we consider them important from a policy perspective. We would also encourage innovative partnerships and the sharing of good practice between urban and rural services to respond more generally to homelessness. Finally the failure to recognise rural homelessness as an issue demonstrates a failure to understand the characteristics and consequences of rural poverty and rural housing precarity which in turn increases

the risks of experiencing homelessness in rural areas.

Shame and stigma

One particular characteristic of rural homelessness that our research revealed is that those experiencing homelessness or who are at risk of homelessness feel ashamed and stigmatised by their position. The shame and stigma of being homeless or at risk of homelessness in rural areas adds to the problems of accessing services. It certainly contributes to the invisibility of homelessness in rural areas. It is also likely to exacerbate the trauma that people experiencing homelessness suffer. The relationship between trauma and homelessness is fully discussed in the literature (see for instance Maguire et al 2009, Someville 2013, Woodhall-Melnik, et al 2018).

Several people who have experienced or are experiencing homelessness told us that they tried to hide themselves away from scrutiny. Stigmatisation was experienced as people not caring. As one respondent said:

"They don't care to tell you the truth, as long as they can go home to a warm loving home and things like that and, you know, have a cooked meal and all that, they don't care about the people what lives on the streets".

Behaviour often went beyond stigmatisation. Some of our respondents were assaulted whilst they slept on the streets. In general people reported that understanding and compassion were much more common in urban areas;people would buy food and check up on people sleeping rough and in general were experienced as more generous.

Housing and homelessness as a lens on rural inequality

The final theme we wish to identify in this research is that looking at rural homelessness and the experiences of those at risk of homelessness, we learn as much about inequalities in rural society as we do about rural homelessness itself. We live in a society where home ownership is the marker of social inclusion. In rural areas those who cannot afford to own homes are doubly excluded.

They have failed to conform to the rural norm of home ownership and they are highly unlikely to be able to afford to rent secure and decent accommodation or be given social housing. What our research shows is that rural inequalities are increasing rapidly, this not only increases the risk of rural homelessness but also may lead to social destabilisation. The causes of rural homelessness and the scale and effectiveness of interventions need to be investigated urgently to avoid any further escalation of inequalities, social injustices and social exclusion.

Further research

This was a small scale research project which, whilst we made important findings about the increasing prevalence of rural homelessness and rural housing precarity, also revealed the need for further research particularly in the following fields

- Housing affordability and housing economies in rural areas including community attitudes to new affordable housing developments

- Rural poverty following Covid 19 and the cost of living crisis

- The impact of the criminalisation of behaviours associated with homelessness

- Urban/rural trajectories of homelessness and precarious housing

- Community responses to homelessness, precarious housing and rural poverty

- The role of pets in the lives of rural people at risk of or experiencing homelessness

8. Recommendations

- The rise in rural homelessness is a strong indicator of rural deprivation. We need more information about its scale and distribution. As part of levelling-up there needs to be a renewed political commitment to ending all homelessness including rural homelessness and other hidden forms of homelessness. Part of that commitment must be an acknowledgement of the 'rural premium' which is unaffordable for the rural poor and places them at risk of homelessness.

- There is a sharp divide between the housing that is available in rural areas and the housing that is needed. Genuinely affordable housing must be a priority for rural areas. It is time for a radical rethink of what it means for housing to be affordable, and how affordable housing is provided in rural areas.

- Local Housing Allowances do not work in rural areas. Support for rental costs has to be more targeted and the government must be confident that huge sections of the rural population are not priced out of housing. Move-on accommodation must be available and affordable. Saving money on housing allowances is short sighted as the long term costs of homelessness are very high.

- There needs to be a long term commitment to providing flexible, multi-disciplinary prevention services in rural areas. Mental health services are a priority. Joined up thinking and innovation must be encouraged through pilot projects, mobile services and one-stop shops. The successes of Supporting People prior to 2009 needs to be evaluated and what worked best in those early years of Supporting People replicated.

- Local networks, local knowledge and the experience, commitment and innovation of local government, third sector and informal and community providers need to be mined for workable solutions.

- Waiting for those experiencing rural homelessness to contact services is not good enough. Providers need to understand and eliminate the barriers people have in accessing their services and be proactive in reaching out to those in need.

- The provision of sustainable, reliable and affordable public transport links between rural and urban areas and market towns must be a priority. Effective public transport would reduce costs on service provision as it would be easier for people to access those services, and will help sustain employment.

- Listening to those who are experiencing, have experienced or are at risk of experiencing homelessness in rural areas - those experiences provide vital underpinnings to effective policy making

Good practice example:
Housing with Employment and Wrap Around Care

Amongst people we interviewed who had experienced homelessness, and housing professionals, there was a strong desire for sustainable long term housing solutions that provided 'more than just a roof over the head'. A number of those who had experienced homelessness emphasised the positive aspects of wrap-around care they had received and the desire for meaningful activities for those in supported or temporary accommodation, alongside a supportive community of people they could trust.

Emmaus in Cambridgeshire is a self sufficient social enterprise which is part of a larger network in the UK. The site offers long term accommodation to people who are experiencing homelessness alongside full time work in its recycling warehouse, gardens and shop. Those that join, referred to as 'companions', work alongside volunteers and staff and are involved in jobs that range from sorting books or textiles, fixing and delivering furniture, repairing computers and tech equipment to be resold, growing produce in the garden or making and sorting things to sell in the shop and cafe. The organisation operates on the principle of 'solidarity' and provides access to services such as mental health support and employment training opportunities.
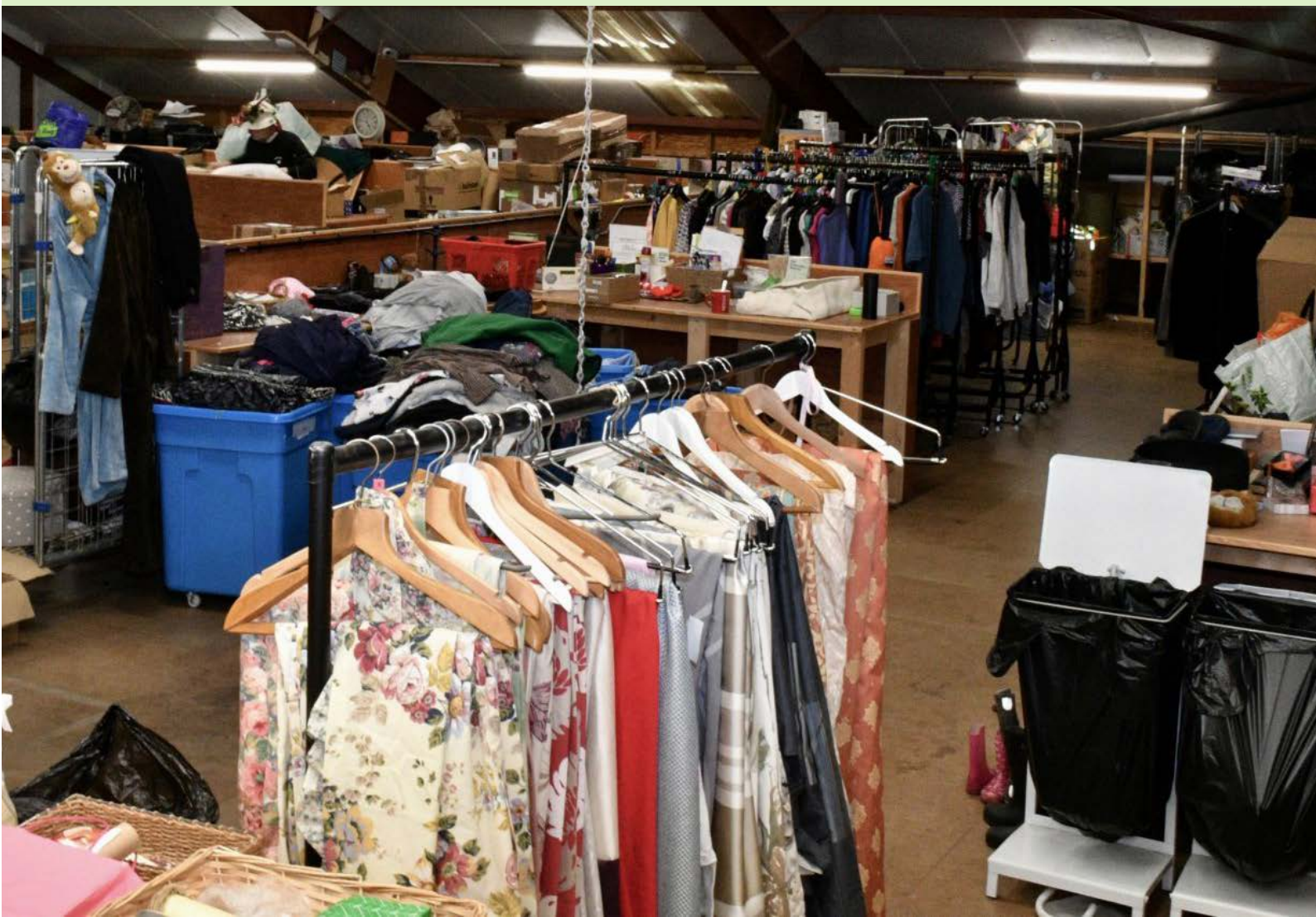
9. Acknowledgements

We would first and foremost like to dedicate this report to people who are currently experiencing homelessness in all forms in the UK, particularly in the countryside, and to those who work tirelessly to support them. We hope that this report can bring about much needed change. Thank you to everyone who gave their time and expertise, whilst experiencing hardship and rural homelessness.

Our gratitude to our task-force/steering group for initiating this research and providing invaluable knowledge into rural communities, and our sounding board for providing scrutiny and advice.

Thank you for funding from the University of Kent's Knowledge Exchange Development Fund, Migration and Movement Signature Research Theme and LSSJ Impact fund. Thank also for support from the Research and Innovation team from University of Kent's Division for the study of Law, Society and Social Justice, Kent Law School and the Southampton Law School.

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10. Appendices

Appendix A - List of Steering Group Members

The research has been commissioned by a rural homelessness task force co-chaired
by Martin Collett and Rory Weal, bringing together experts from organisations listed below.

English Rural Housing Assocation

CPRE The countryside charity

National Housing Federation

Homeless Link

Hastoe Housing Association

Action with Communities in Rural England (ACRE)

The Rural Services Network

Citizen Housing

Trent and Dove Housing

The Rural Housing Alliance

Church of England Public Policy Team

Susan Eastoe

Jo Richardson, Prof. of Housing & Social Inclusion, DMU, Leicester

Appendix B - Interviewees in Ethnographic Research

Interviewees with lived experience of homelessness
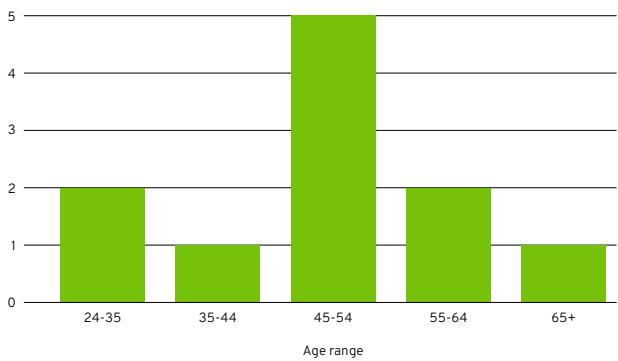
Interviewees with lived experience of homelessness
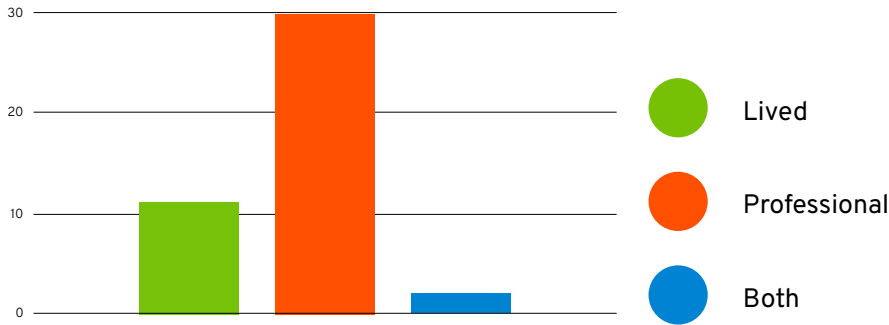
Total Interviewees
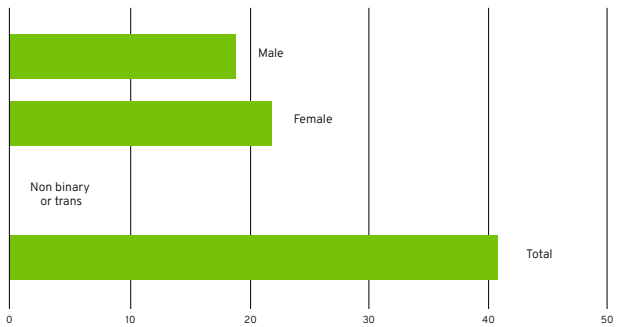
University of
Kent

University of
Southampton

LAND, LANDOWNERS, AND THE DELIVERY OF AFFORDABLE HOMES IN RURAL AREAS

September 2023

Phoebe Stirling, Nick Gallent and Iqbal Hamiduddin

FOREWORD

The countryside has an acute affordable housing crisis.

Less of the housing stock is owned and managed by affordable housing providers when compared to urban, house prices are typically higher than other housing markets and local incomes lower. There is high migration from urban to rural areas and not enough new rural homes are being built. For several decades now there has been a lack of ambition and investment in tackling this issue. It is a problem getting worse each year, to the detriment of the national economy and rural communities.

This insightful project, completed by researchers from University College London in collaboration with English Rural Housing Association undertakes a 'deep dive' into the use of rural exception sites as a mechanism for delivering new homes in the countryside. Most critically, affordable homes that secure benefit for the local community and low-income households who have a need to live there. In short, the research explores what is seen as an important part of the solution to the countryside's housing crisis.

First established in national planning policy back in 1991, rural exception sites provide a route for delivering small scale affordable housing developments in rural settlements. Subject to certain conditions being met, including ensuring that homes remain affordable and that households with a local housing need are given priority, planning is given on an exceptional basis. The exception being that the land to be developed sits outside of the settlement boundary and would not ordinarily attract planning permission.

Exploring rural exception sites in the way that this research does shines a light onto an underutilised and underrated planning policy, that when used effectively, has the potential for delivering transformative benefits for villages across England. When done well, the approach delivers a targeted development of new homes in partnership with local people, at an appropriate scale - meeting local housing need, securing economic gain and providing wide ranging benefits for landowners.

Through their work the researchers have listened to first hand experiences and appraised actual rural exception site developments to draw together a series of objective and impactful recommendations. They have explored a range of real-life examples incorporating both successes and failures, examined these through the lens of different but critical players involved to secure unique and contrasting perspectives.

The recommendations emerging from this work provide a blueprint for scaling-up affordable housing delivery in the countryside through more effective awareness raising, and a positive approach by local planning authority and enabling agents.

FOREWORD

Perhaps most critically, the researchers explore the essential role that landowners play in making rural exception sites available and the lack of clarity around site values and permissible incentives. As well as getting a unique glimpse into the views of landowners, the researchers expose the informal rules guiding site values and inconsistent approach to offering incentives outlined within national planning policy guidance.

During 2021/22 only 548 homes were built using the rural exception site policy and most of these within a handful of local planning authority areas. This research must be the start of a bigger conversation about leveraging the policy nationally to deliver the affordable homes that those who live and work in the countryside desperately need.

Martin Collett,
Chief Executive, English Rural

RECOMMENDATIONS

1

Getting good information to parish councils

To have a consistent and positive approach to supporting RES development in Local Plans and supply every parish council with up-to-date information about the RES policy and how it works in their area, so that they understand the role they can play and the process.

2

Understanding what makes RES different

Train Rural Housing Enablers and similar roles with the expertise necessary to convey how RES sites are different and can help to provide an extension of the already existing community.

3

Qualifying landowner incentives

Bring together a taskforce to develop guidance on incentives permissible on RES developments, beyond that for cross-subsidy and from this publish additional guidance to qualify the incentives that can be used to encourage landowners to release land, framing these in a way that is transparent, reasonable, and proportional.

4

Better use of Rural Exception Sites through a national programme

Through political commitment there is better promotion and use of more effective policies for delivering RES with an ambition that each rural settlement in England delivers a proportionate development of affordable homes.

5

Promoting 'good design'

Produce a good design that showcases positive RES development to counter local stigma around what new homes will look like, and how they will affect the character of already existing communities.

WHY IS AFFORDABLE HOUSING IMPORTANT TO RURAL COMMUNITIES?

Affordable housing is vital for building thriving and sustainable rural communities. In small towns, villages and hamlets, there can be a significant gap between local earnings and house prices. Since wages in rural areas do not guarantee access to the housing market, access to good quality, affordable homes, usually provided by a housing association or other registered provider (RP), means local residents can stay in their area. By allowing people to stay in the communities they are connected with, affordable housing contributes to the wellbeing of families, allows young children to attend local schools, and allows adult children to remain living close to their parents. It situates people in important social networks and thereby contributes to the social life of a local area.

It also allows people to live where they work, providing access to local jobs and supporting the rural economy. Organic community growth is supported by a range of different kinds of housing, providing homes for people in a range of different types of employment. These functions also underpin the community vitality that makes rural areas so attractive to newcomers, either holidaying or moving to the area. But low build rates mean that rural areas have proportionally far fewer affordable homes than urban areas (Taylor 2008; Baxter and Murphy 2018), resulting in a lack of housing options for people living and working in rural communities. This can have detrimental social and economic consequences, like outmigration of low-income and younger groups.

THE CHALLENGE OF AFFORDABLE HOUSING DELIVERY

Rural RPs exist for this purpose, delivering a service that the market cannot. Central to the work of delivering affordable housing, is dealing with the price of land. The cost of land designated for housing development (land price is determined by best permissible use) is one of the greatest obstacles to delivering non-market housing. Developing housing in rural areas can be particularly costly, in part due to the higher cost of housebuilding. Sites are smaller and economies of scale harder to achieve, resulting in less affordable housing. Since the smaller income raised from affordable rents and sales cannot cover the costs of market development, RPs rely on finding low-cost sites, to deliver affordable housing in rural areas.

This is set within a planning framework that prioritises 'sequential' development, showing a preference for expansion of urban areas over development in rural areas. The desire of local communities to protect the countryside, rural amenities, the environment and house prices can also restrict development in rural areas. This, combined with the migration of affluent groups out of cities and into the countryside, where their financial resources often eclipse those of local populations, means the demand for houses in rural areas can outstrip supply, pushing land prices further upwards. A central challenge faced by rural RPs is therefore finding low-cost sites on which to build affordable housing.

> " The cost of land is one of the greatest obstacles to delivering non-market housing "

HOW DO RES SUPPORT THE DELIVERY OF AFFORDABLE HOUSING

Rural exception sites (RES) are a policy mechanism for delivering affordable homes on small plots of rural land that would not otherwise be granted permission for housing development. Since 1991, housebuilding has been granted on these sites in the 'exceptional' circumstance that any development is guaranteed to provide affordable housing for people with a connection to the local area, in perpetuity. Otherwise, these sites would not be granted planning permission, meaning the land carries a lower value, potentially removing the cost impediment to affordable housing delivery. The value of these sites is not dictated by the policy and is open to negotiation in each case, but if land can be secured at a price well below the value of land for open-market development, this makes it possible to build affordable homes in rural areas.

Despite the benefits that landowners can gain from bringing unallocated land forward for RES delivery – achieving a greater value than for its best permissible use – securing sites for RES delivery is still a huge challenge for rural RPS. Questions therefore arise about how RPs can work with landowners to encourage more sites being brought forward, and what additional mechanisms might be required to support their work.

By granting exceptional permission to build housing on land with a lower value, RES can play a key role in the delivery of more affordable homes in rural areas. This was recognized when the National Planning Policy Framework (NPPF) was first published in 2012, encouraging the inclusion of RES policies in local plans.

Traditionally, rural exception sites could be used only for affordable housing. However, since 2012 the NPPF has stipulated that "small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding". This cross-subsidy is an additional mechanism to encourage more land being brought forward for RES development. Building some market housing on exception sites is intended to generate funds that will subsidise the cost of the land, making affordable housing development viable where it might not otherwise have been. The viability of each scheme, the need for cross-subsidy and amount of market development required to make schemes viable without grant funding, will be assessed by the local authority and subcontracted consultants, and paid for by the landowner. Views are mixed as to the appropriateness of building market housing on exception sites.

HOW DO RES SUPPORT THE DELIVERY OF AFFORDABLE HOUSING

The main advantage of cross-subsidy is that it incentivises landowners to bring sites forward. But there is a risk that the potential for market development changes landowners' expectations of the value they can achieve by bringing land forward for RES delivery. Safeguards may also be necessary, to limit the amount of market housing built on exception sites and preserve the primary purpose of providing affordable housing, held in perpetuity for local needs. .

Despite the benefits that landowners can gain from bringing unallocated land forward for RES delivery – achieving a greater value than for its best permissible use – securing sites for RES delivery is still a huge challenge for rural RPS. Questions therefore arise about how RPs can work with landowners to encourage more sites being brought forward, and what additional mechanisms might be required to support their work

WHAT DO WE ALREADY KNOW ABOUT RURAL EXCEPTION SITES?

During the past 30 years, the factors affecting the progression of RES have been periodically investigated. While research in this area is not comprehensive, the following observations can be drawn from the research literature.

While RES delivery is significant for local communities and may feel significant at the level of individual villages, it has not been used to deliver great numbers of affordable homes nationally (Webb et al 2019). A significant proportion of affordable rural housing has been created using RES, but this should not be confused with overall delivery. The policy "actually delivers relatively few new homes to rural communities" (Taylor 2008).

Indeed, the geography of RES delivery is patchy, with only 14 of 91 rural authorities delivering homes on these sites in 2016/17, 37% of which were delivered in Cornwall alone (Baxter and Murphy 2018). A map of where homes on RES were delivered between 2017 and 2022 is presented at the end of this report, and a table of the top-delivering local authorities is provided below.

A key impediment to progressing RES is a lack of information. Information on the need for affordable housing in a local area can be scarce, so the first port of call in progressing RES is often the local authority housing enabling officer or Rural Housing Enabler (RHE) (Lavis et al 2017).

Table 1: Local authorities with the most affordable homes on RES, 2017 to 2022

LOCAL AUTHORITY	NUMBER OF AFFORDABLE HOMES
Cornwall	1097
Shropshire	264
Sedgemoor	185
North Norfolk	101
Derbyshire Dales	93
South Cambridgeshire	89
Cheshire West and Chester	86
East Hampshire	85
Winchester	68
Stroud	65

Source: Local Authority Housing Statistical Data Returns, Affordable Housing Supply, 2017-2022

A RHE can give landowners information about possible housing associations they can work with, can work with local communities and collect data to assess the need for affordable housing locally, and help to build local support (RHA 2021). However, as Webb et al (2019) observe, coverage of RHEs has declined.

A further impediment to progressing RES are the expectations of landowners (Baxter and Murphy 2018). The 'hope value' of land can discourage landowners from selling sites for RES development (Satsangi and Dunmore 2003). Therefore, working to manage landowners' expectations around the value of their land can be a central part of the work that goes into affordable housing delivery. This might be done by appealing to their other priorities, such as a desire to see local communities thrive. Landowners may even have their own priorities and preferences for the site (Lavis 2017), and large estates may see 'stewardship' as a motivating factor for releasing land (CLA 2017).

The approach taken by the local planning authority can also affect the success of exception site policy. Many local authorities have RES policies in their local plans, but may not pursue them in practice (Satsangi and Dunmore 2003), viewing them for 'exceptional' use, applying very strict criteria, thereby discouraging engagement by local residents and landowners (Taylor 2008). The CPRE (2020) observes that the wording of RES policies are significant, and can put off landowners if they seem like a list of criteria disqualifying sites from the policy.

Finally, the literature tells us that local support is essential for successful RES delivery. Local residents are not always in favour of affordable housing development. However, the buy-in of local residents may be more likely when schemes are in keeping with village aesthetics and use local materials (CPRE 2020).

The research in this area therefore acknowledges that the RES policy does not deliver on its potential, and highlights some impediments to delivery. Nevertheless, more could be learned about these impediments from those who are successfully working to overcome them, encouraging landowners to bring forward sites, building consensus amongst those with divergent views, and maintaining support for these projects. Our research involved speaking with RP officers working on the ground to bring RES projects forward, liaising with communities and landowners (see Table 1). We aimed to find out more about what it really takes to make land available for RES delivery, and given this, why the RES mechanism might be falling short of its potential.

WHAT DOES A RES PROJECT LOOK LIKE?

RES projects can start in many ways and can develop very differently. There is no fixed formula. Projects may be kick-started by landowners looking to sell their land; when a parish council decides to survey the local need for affordable housing; or when the local authority requests that this is done. While no project is the same, from the RP perspective, the general model can look like this:

Housing needs surveys are used to determine the level of need for affordable housing locally.

Site searches are performed to identify all potential sites in the area. This could involve a 'walkabout', where the parish council and RP officers walk around the local area assessing possible sites. If a specific site has already been proposed, either by the landowner themselves or by the parish council, a site search should be performed anyway, to satisfy the planning authority that this is the most appropriate site for development.

Once a site has been identified and a provisional agreement to proceed has been made between the landowner and RP (and preferably also the parish council), a pre-application discussion can be held with the local planning authority, making sure they are broadly happy with the site and access, making further enquiries with the statutory authorities, and making sure the requisite services (e.g. highway connection etc.) are available.

At the point that the RP becomes involved, it is beneficial to secure the support of the parish council, if this has not already been established.

At this stage the RP will also look to move forward with a more formal agreement with the landowner. The first step is the Heads of Terms, which is not legally binding, but sets out in principle the terms of sale. The Heads of Terms will establish that the landowner owns the land, providing a copy of the title deed to make sure there are no caveats or obligations that prevent development. The price is also established at this point.

After the Heads of Terms are agreed, a legally binding agreement will be set out in the Option Agreement, to sell the land subject to gaining planning permission.

If pre-application discussions are positive, this provides the security to move forward with a planning application, including a public consultation to receive comments and objections from the local community.

If planning permission is granted, this represents a watershed moment in the project timeline. A contractor will be identified, this will usually involve a formal tender process that is managed by the housing association. A surveyor would also be engaged to look after the on-site day-to-day aspects of the project, on behalf of the RP.

The interviews and case studies we undertook for our research suggest that successful projects are those with the most transparent and open dynamics between all parties. It is therefore important to keep all parties in touch and updated of all developments throughout the project. There will be multiple back-and-forth exchanges throughout.

A nominations agreement will be drawn up to allocate the housing to local residents, to be included in the S106 agreement. This includes making sure that any buyers of discounted sale housing are not put in a position they cannot afford.

At completion, the RP's housing management team will take over from the contractor.

WHAT ARE THE CRITICAL FEATURES OF RURAL EXCEPTION SITE DELIVERY?

Our interviews with national stakeholders drew attention to various features of RES delivery that can impact on the success of projects.

Registered housing providers need to invest in building durable local relationships

Delivering housing using RES requires that RP officers work closely with other partners. The RP has the successful delivery of each project as its priority. Whether they are brought on board by a parish council looking to build affordable housing to support their community, contracted by a landowner looking to sell their land, or by a RHE, the RP will play a central role in the project, liaising between all the other interested parties and making sure each side is satisfied and prepared to move the project forward.

It therefore falls to the RP to build and maintain a good relationship with local landowners, which can be crucial to the success of projects. One major task is to understand what further incentives might be needed to encourage landowners to sell their land at a price that is viable for the RP.

There are different 'tiers' of relationships that need to be maintained at different levels, from the small local builder, local parishioners, local planners, ward councillors, independent community organisations with experience of progressing RES, to the statutory authority, or Homes England.

Creating a joined up approach between these parties can facilitate the kind of open environment that fosters ongoing support for RES projects.

The long timeframe of rural exception sites can affect critical partnerships

A major feature of RES projects is that they can be drawn out over very long timeframes. Some projects take up to five years, others even longer. This means that both support for and opposition to any scheme can wax and wane, and the continued support of the parish or parish councillors cannot be taken or granted throughout. People can change their minds, parish councillors and local planners can come and go. For example, in the case of Hernhill, the RES project was already at consultation stage when three people from a local opposition group were voted onto a parish council of seven. New parish council members can tip the balance and change the minds of supporters. When there are changes in personnel at local planning authorities, new planning officers may not be convinced by the project, and can reject a planning application that had previously received informal support for approval. It may be necessary to revisit aspects of the application, redo a site search to conclusively demonstrate the need for a specific site, or have a second housing needs survey done, confirming an ongoing need for affordable housing.

The timeframe of these projects makes it necessary to maintain contact between all parties and maintain momentum throughout. RP officers often take on the role of project coordinators, making sure everyone is kept in the loop. This role comes at a cost, requiring a significant amount of up-front consultation. But the in-depth work required to identify local housing need, to identify sites, and to manage local opposition, means that RES projects will usually be lengthy. Overcoming this challenge is about staying the course, keeping all parties engaged, and taking one challenge at a time, rather than attempting to solve every problem at once.

Identifying the most appropriate site can be a contentious process

Another major challenge can be the potential for conflict about what constitutes the best possible site. The parish council and local planning authority may have very different ideas about the sites that are available.

Once a parish council have chosen a site they feel is appropriate, they may feel committed to this site and the contribution they believe it will make to their community. This may not align with what local planners judge to be suitable, for example if there is a risk of flooding. Choosing a site can depend on negotiation between these groups, for example by communicating to a parish council that their preferred site is inappropriate, or communicating to planners that a site is non-negotiable and that the project won't go ahead without it. Even where planners and the parish council are agreed on a site, local residents have been known to club together to fight for an alternative use, or even to buy the land themselves, as may have been the case in East Boldre.

The housing built on rural exception sites is often misunderstood

Even where RES development has the support of the parish council, local opposition can be fierce, and stop a scheme in its tracks. At times this may be based on a misunderstanding about the housing contribution that RES makes to a local community. RES schemes always give priority to new residents that have a local connection to the area, as well as a need for affordable housing. This local connection ensures that residents will be found from those within or engaged with the local area and that developments form an extension of the existing community. People do not always understand this feature of RES housing, and may fear that housing on RES sites will provide general needs social housing for people from outside the local area. Even when this distinction is made clear, people may fear that it will not be held to in each case.

The local connection criteria of RES housing may therefore need to be communicated to parishioners right from the start of a project. Where projects take a particularly long time, conducting additional housing needs surveys can help to bring new parties on board by confirming the need for affordable housing in the area.

The design of schemes may also affect their acceptance by the local community. There is a stigma around low quality affordable housing, that goes hand-in-hand with the fear that RES will change the character of a place by introducing new residents without any local connection. Parishioners are less likely to support projects when they fear these will not be sympathetic to the existing social fabric, character, and style of a place. An assurance on good design, high standards, and that developments will be consistent with local aesthetics could help to affirm RES development as an extension of the existing place, for the people who live and work there.

Cross-subsidy is not always sufficient to meet landowners' expectations for their land

Increasingly, a challenge for RES delivery is that landowners are looking for better returns from their land than from traditional RES delivery. The NPPF states that 'a proportion of market homes may be allowed on the [exception] site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding'. Some local plans limit the proportion of market homes to the minimum necessary to support viability. However, there is no strict policy about additional development on rura

l exception sites, for landowners' benefit. This means RPs must enter into negotiations with landowners who are not otherwise interested in selling the land at or near agricultural value. With levels of cross-subsidy established between the RP and the landowner and only then agreed with the local authority, the distinction between cross-subsidy and landowner incentives may be blurred. In addition to building market housing for cross-subsidy, RPs often provide further development on the site, such as serviced plots, site improvements, or including commercial property to be retained by the landowner in the planning application, as an incentive.

This sort of incentive was well known to our discussants, and to the landowners they worked with, who went into negotiations with a 'hope-value' far exceeding the agricultural/non-housing value of their land. Commercial sensitivity may prevent RPs from discussing the true value of RES plots openly.

> **Commercial sensitivity may prevent RPs from discussing the true value of RES plots openly.**

Discussants explained that the value of additional development needed to be 'proportionate' to the value of the land, so as not to set unrealistic precedents. Nevertheless in reality, the value going to landowners in exchange for RES plots certainly exceeded the £10,000 that has often been associated with the policy.

Since there is no formal policy as to the value of RES plots, nor of any additional development that might be required as an incentive, these are negotiated informally on a case-by-case basis by the landowner and RP. This comes at a cost to RPs, who need to manage the expectations of individual landowners in each case, balancing these against their own financial constraints, rather than having recourse to a consistent approach.

HOW CAN THE CHANCES OF SUCCESS BE MAXIMISED?

1. Support of the parish council is key

The support of the parish council is important in part because the local authority planning committee will have a hard time approving a planning application that the parish council doesn't support. Additionally, the support of the parish council may be critical in their ability to bring local objectors round, meaning public consultation can be particularly difficult when the parish council is not totally behind a project. In our case study of East Boldre, the RP English Rural had been contacted by a local landowner about a pocket of land they wanted to sell, and the parish council were not involved from the inception of the project. While they were supportive in principle, they had reservations about the site, and the scheme was beset by opposition, and was ultimately unsuccessful.

Cases where the parish council are involved right from the outset have shown greater success. At Leaveland near Throwley, the parish council had a clear view that affordable housing was needed in order to house families who had lived in these villages for a long time. They contacted the organisation Action for Communities in Rural Kent (ACRK) which then got English Rural on board. This meant the local community were involved at the stage in which the housing association were brought on board, which may have engendered greater trust between them

2. Managing the planning process

Both pre-applications and planning applications can be time consuming, and require several back-and-forth exchanges with local planners to make sure all possible factors affecting development have been considered, and that the development satisfies local policies. RP officers can play a significant role in maintaining this relationship, which can require consistency and repeated exchanges to maintain dialogue with the local planning authority. If the parish council and others involved in bringing the project to planning are convinced by their chosen site but this is dismissed by the planning authority, it can help to include every detail about the site search process within the planning application.

This can serve to convince planners that every step has been taken to consider alternatives, leaving no choice but the selected site. In Leaveland near Throwley, English Rural engaged in a back-and-forth debate with the local planning team about the site chosen by the parish council. In the end it was felt that securing planning permission came down to persistence, and working to persuade the planning team to accept the site over two years. The intervention of an experienced RP may be decisive at such a stage, preventing a battle-of-wills between local authority planners and parish councillors with very different ideas of what constitutes the most appropriate site.

From the local planning authority's perspective, it can be helpful to consider the wording of any RES policy within the local plan. These policies should seek to support rather than to restrict RES development. Continuity of resourcing may also be an issue, because of the long timeframe of RES projects, and the turnover of planning officers can stymie projects as officers' views may shift. In the case of Hernhill, and West Kingsdown, the local planning authority took the initiative to invite all parish councils locally to have a housing needs survey done, kick-starting the discussion about affordable housing across the borough. The goal was to be systematic and survey all local housing need in the area, rather than taking the piecemeal approach more usually applied, in which parish councils initiate housing needs surveys as-and-when they decide to.

3. Managing public opposition

Managing the concerns of local residents at public planning consultations can require taking each comment at a time, considering its value, and addressing it on its own terms. This is therefore a lengthy process, but helpful if local residents are going to feel heard and come to support the project. Part of the strategy for dealing with opposition at public consultations, we were told, is separating the 'planning objections' from the 'emotional objections'. Practical concerns, such as those to do with road access, can be addressed in a systematic way. For example, in the case of West Kingsdown, the main objector was a nursery, which had concerns about houses overlooking the nursery grounds.

This can be addressed through the design of the scheme. A very different kind of objection are those raised by people more fundamentally opposed to development. Addressing these concerns can be a more delicate matter of making the case for local needs housing in the area.

If local residents feel they have somehow been left in the dark, this can create opposition to a scheme that would be less significant if they felt more in the loop. The public may feel the parish council have been 'operating behind closed doors' if public consultation takes place after a long period of internal negotiation. In Hernhill, when a local action group formed in opposition to the scheme and three members were voted onto the parish council, English Rural invited them to become part of the project's design group. This extended the length of the project, but meant they were really listened to, and may have given them a clearer sense of the project's goals and constraints. While this kind of collaborative approach can be hard work, in this case the group withdrew their opposition.

4. Housing associations need to build long term relationships in order to garner local support

RPs may find that they need to have a long-term strategy for managing RES, rather than managing each project on a case-by-case basis, in order to maintain a good track record for delivering on their promises, and a reputation for consistent outcomes. The final quality of a scheme, how well managed it is once it is up and running, or whether it reflects what the

community felt they were going to get can all affect a RP's reputation. Consistency in these areas over the long-term can help RPs to manage local opposition in specific cases. As part of this strategy, RP officers may do well to identify potential hurdles in advance, such as if a landowner is using a rural exception site to begin developing on land that the community would otherwise object to. In Burstow, the prioritisation of need above connection with the local community and economy resulted in homes being allocated in a way that had not been expected by the parish council. Discussing issues like the local authority approach to allocating homes upfront helps to maintain a culture of transparency and avoids one where one party may look to apportion blame to another. Regular information exchange with all the other parties involved in a scheme will be key, but also with other rural RPs, who may be able to share their experience. This need for intensive communication is increasingly one of the main costs associated with smoothing the delivery of RES schemes.
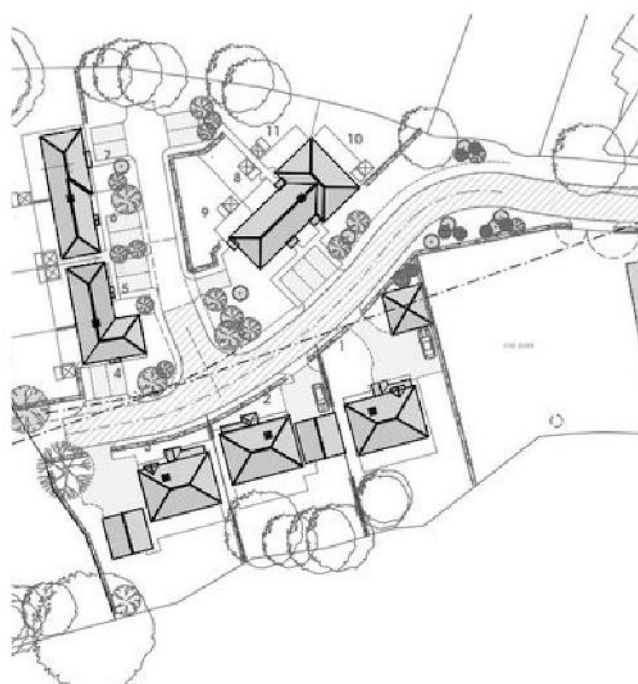
5. Incentivising landowners

There are two broad schools of thought around incentives for landowners. The first view is that the main incentive lies in the granting of exceptional permission for the development of affordable housing, providing greater value to landowners than for agricultural/non-housing use. According to this view, the RP should only need grant funding – or additional development for cross-subsidy – to support the cost of development.

Under this school of thought, there are still various incentives that RPs can use to encourage landowners to bring land forward. These include the landowners' ability to maintain an ongoing interest in the site, for example by building or delivering the housing themselves, as was the case in our case study of Chiddingstone. Larger estates in particular may wish to retain nomination rights, if they have employees living in local affordable housing, as was the case in Leveland near Throwley. Even when landowners are keen to bring land forward for RES, they will need the energy and enthusiasm to become involved in the RES process, which can be lengthy, time consuming, and complex. In Chiddingstone, English Rural were able to help the landowner with the transaction costs associated in bringing land forward, helping them to manage the process and the relationships involved. In Hernhill, English Rural were able to help the landowner manage personal opposition, by keeping him in the loop about all details, and letting him know everything that was being done to address opposition to the scheme.

The second school of thought is that landowners releasing land for RES development are foregoing the 'hope value' attributed to their land, when they release it at less than full residential value. This view sees land released for RES development as being sold at a discount to RPs, even when the current best permissible use may be agricultural. It is this sense that landowners are selling their land at a discount which makes additional incentives necessary. Our research tells us that RPs are faced with this reality. Since rural RPs are concerned primarily with getting schemes off the ground and to completion, they have no choice but to engage in negotiating additional incentives with landowners.

There is no strict policy about additional development on rural exception sites, for landowners' benefit. Local planners may be reluctant to give guidance about what additional development will be accepted in a planning application, or how to manage the design of such schemes, because while it is recognised that additional development can be required to achieve the buy-in of landowners, planners prefer that RES sites are not

used to open the door for further residential development.

We identified various ways that RPs can work with landowners to incentivise RES delivery without opening sites to further development down the road. By keeping additional development to an agricultural (rather than domestic) standard, this can limit the potential for further development close to the site, and help to satisfy local planners that this will not be 'the thin end of the wedge'. Features like an access road, or a concrete foundation for a building, can benefit the landowner if they are retaining some land or development for personal use. Features like these are cost-effective incentives: small exception sites often require access roads in any case; contractors may build foundations for their own on-site offices during the development phase; meaning they don't add to the cost of the scheme.

Some landowners are very upfront about what additional development or land value they expect to achieve in exchange for bringing forward their land. Others may not be so upfront, preferring instead to negotiate later, once plans are more progressed. Others may not even have clear ideas about what they expect from the process, beyond the cost of the land. RP officers may have to work to draw out landowners' feelings about the different approaches and incentives available. In-person meetings may be the best means of doing this, allowing RPs to view the site for themselves, and building a full understanding of the landowners' position.

Nevertheless, it remains that incentives for landowners to release RES plots have been established on an ad-hoc basis, and that RPs are left to negotiate these in an unclear policy context.

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MAP 1: DISTRIBUTION OF AFFORDABLE HOMES ON RES, 2017-2022

5 Year RES Total
- 0 - 7
- 7 - 25
- 25 - 58
- 58 - 101
- 101 - 264
- 264 - 1097

0   50   100   150 km
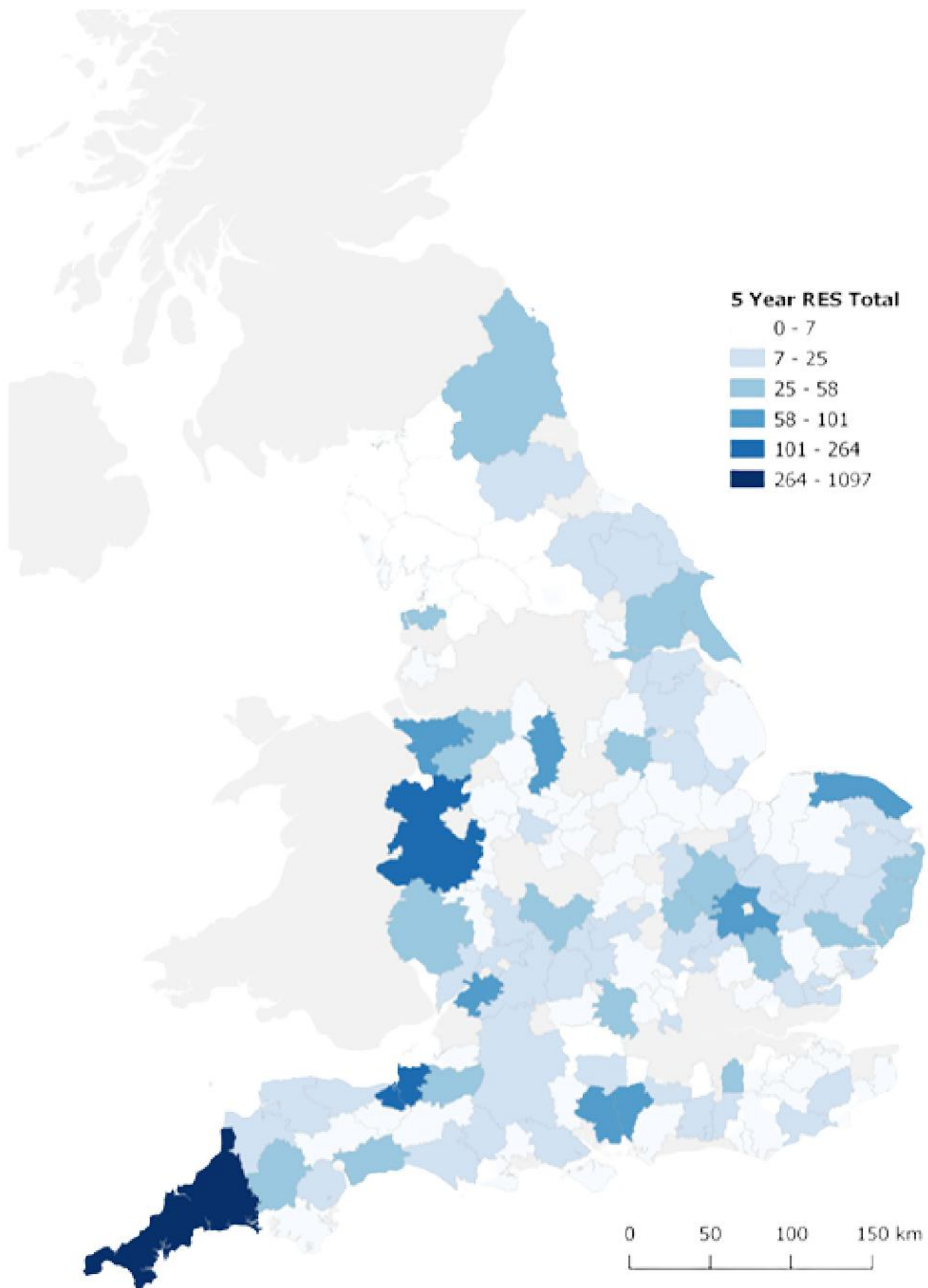
Credit: Map produced by Duncan Smith, CASA, UCL.

TABLE 1: CASE STUDIES OF RURAL EXCEPTION SITE DEVELOPMENTS BY ENGLISH RURAL HOUSING ASSOCIATION

Name of Parish	Local Authority Area	No of affordable homes	No of market homes	Date completed
Burstow	Tandridge DC	3 affordable homes	None	2022
Chiddingstone	Sevenoaks DC	8 affordable homes	3 open market homes	Not yet completed
Dunsfold	Waverley BC	6 affordable homes	2 homes for discounted market sale	2020
East Boldre	New Forest National Park Authority	Unsuccessful	Unsuccessful	Unsuccessful
Hambledon	Waverley BC	5 affordable homes	2 open market homes (bungalows)	Not yet completed
Hernhill	Swale BC	6 affordable homes	2 open market homes (bungalows)	2022
Leaveland near Throwley	Swale BC	6 affordable homes	2 open market homes (bungalows)	2019
West Kingsdown	Sevenoaks DC	10 affordable homes	2 open market homes (bungalows)	Not yet completed

FACTORS IN THE EFFECTIVE DELIVERY OF RURAL EXCEPTION SITES IN ENGLAND

February 2024

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APPENDICES

MAIN ACRONYMS USED IN THIS REPORT

RES	Rural Exception Site	**CLT**	Community Land Trust
RHE	Rural Housing Enabler (independent)	**HRA**	Housing Revenue Account
LA	Local Authority	**NPA**	National Park Authority
RP	Registered Provider (of social housing)	**ACRE**	Action with Communities in Rural England
RCC	Rural Community Council	**DM**	Development Management
NPPF	National Planning Policy Framework	**AONB**	Area of Outstanding Natural Beauty
LPA	Local Planning Authority	**PIP**	Planning in Principle

EXECUTIVE SUMMARY

This is a summary of research into the delivery of affordable homes on Rural Exception Sites (RES) in England. It was commissioned by the Rural Housing Network and undertaken by a team of researchers based at the Bartlett School of Planning, University College London. Its focus was the factors and processes that advance or impede the successful delivery of RES, extending to the capacity of local authority planning teams to support these small rural housing schemes.

1.1 What are rural exception sites?

Housing need in rural areas can be met on allocated or exceptions sites. Development on rural exception sites, often led by Registered Providers, is intended specifically to provide affordable homes for local need. Exception sites are not allocated for development in Local Plans. Land price therefore reflects their prescribed use and is far below the full residential development value paid for land on allocated sites.

These are small-scale needs-led developments involving:

- The **Parish Council** (representing the community and working with partners on understanding and measuring need)
- A **Rural Housing Enabler or a dedicated enabling officer from the Local Authority** who will work with Parish Councils and communities to evidence need, identify potential sites, and bring development forward by acting as an 'honest broker'

- A **Registered Provider** of social housing (purchasing land, developing or contracting the development of homes, and managing units)
- A **Landowner** (willing to sell land at a price that supports affordability)
- Community led groups can also help with evidence gathering and with building local support, sometimes forming a **Community Land Trust (CLT)** (that may purchase land and lease it to a Registered Provider or develop it themselves)
- And the **Local Authority** (comprising a housing department, leading on evidencing need and enabling development, and a planning department, setting the local policy framework, advising on the suitability of sites, and performing a Development Management role)

Sources of funding and finance for Rural Exception Sites are mixed. Grant support may be provided by **Homes England**. Local Authorities may also use capital receipts, Section 106 revenues, and/or public borrowing to support projects. Registered Providers also directly support projects from reserves and new borrowing.

1.2 Project Description

- The research behind this report comprised:
- A review of existing research studies focused on rural exception site delivery (set out in Part 4 and summarized below in 1.3)
- Conversations with national stakeholders sitting on the project steering group, to 'baseline' current knowledge (see Part 5 and 1.4 below)
- A survey of rural planning authorities that aimed to understand how local resource constraints might impact on exception site delivery (see Part 6 and 1.5 below)
- Six local case studies that sought to understand different approaches to delivering affordable homes on exception sites, identifying 'what has worked' on the ground (see Part 7 and 1.6 below)

Key messages from the research are brought out in Part 8 of the report and summarized below in 1.7.

1.3 Lessons from Past Research

Past research on rural exception sites has been consistent in its key messaging over the last 30 years:

- Community support is key to the success of small rural housing projects, whilst strong opposition is often a cause of failure
- Rising land costs and landowner price expectations have often impeded the

the delivery of RES, an issue that has more recently been associated with the inclusion of market housing (for the purpose of cross-subsidy) which may further lift price expectation unless clear limits are placed on the market element, and land price, in local policy

- delivery of RES, an issue that has more recently been associated with the inclusion of market housing (for the purpose of cross-subsidy) which may further lift price expectation unless clear limits are placed on the market element, and land price, in local policy
- Working with landowners to secure land at the right price is critical to success
- The case for affordable housing is won in Parish Councils, where landowners interface with communities
- Independent and/or LA-based Rural Housing Enablers are crucial: their knowledge, experience, and their capacity to be honest brokers, drives RES projects
- A flexible government/Homes England funding regime that recognises the challenging economies of scale, and build costs, of rural exception sites is fundamental to their success

- Clear and stable planning policy – setting out where sites will be allocated for housing and where RES are likely to be the major source of affordable homes - gives certainty to local projects, although the implementation of that policy needs to adapt to local circumstances (including, for example, settlement density and morphology, landscape character, or ground/ environmental risks)
- Lack of plans and out-of-date plans impede RES because potential sites can be developed as market housing under the Presumption in Favour of Sustainable Development
- A resource crisis in planning coincides with the laying of new duties on local authorities, potentially resulting in delays in identifying sites and taking RES through the planning process

1.4 Lessons from Baselining Conversations

The pace and volume of RES delivery is impacted by:

- The level of corporate priority attached to rural housing delivery across a local authority: political priority incubates officer and partner confidence
- The presence of an active and experienced 'rural housing enabler', either LA-based or independent
- Parish councils, enablers, and RPs must work together to build the evidence and the community support for RES

- Supportive local plan policy is vital
- A planning pre-app service, available at an early stage, is needed to test the suitability and viability of sites. This must be affordable to partners and viewed as part of local authorities' strategic enabling service
- Constructive engagement with a willing landowner is also vital

Planning resourcing may impact RES in the following ways:

- Staff shortages, and unfilled posts, mean low capacity to pursue challenging opportunities such as potential RES
- Loss of knowledge and experience can make small rural housing sites particularly challenging for local authorities
- Slowing of the planning service may drain the impetus from RES
- Resource challenges can result in a refocusing on 'core duty' – e.g., plan-led housing allocations – and away from exceptional developments
- Loss of LA-based enablers (as a broader outcome of local government under-funding) and reduced coverage of independent RHEs (that are periodically government funded) may significantly undermine RES

1.5 Lessons from the National Survey of Planning Authorities

- Forty (40) local authorities responded to the survey of rural planning authorities in England

- Planners are determined to do their jobs, and believe they do them well despite resource constraints
- Recruitment (reported by 87% of respondents) and retention of senior staff (92% of respondents) are the biggest constraining factors. Solving these issues has the greatest potential to fill the skills gap, and encourage junior staff to remain in the sector
- Vacancies exist in 80% of responding authorities' planning departments
- 83% of respondents cited new requirements (including nutrient neutrality and biodiversity net gain) as contributing to high levels of stress. Policy uncertainty and change was a contributing factor
- Planning departments do not feel that delivery of RES is their responsibility: it lies with housing teams, although the way in which Development Management engages with prospective RES projects is critical to their success

- 78% of responding authorities felt that sharing good practice would be the most effective way of enhancing service levels and quality.
- Local planning authorities highlighted the importance of:

  - Being able to fill senior posts, and therefore having the experience needed to fulfil complex tasks well (and also having leadership capacity);
  - A stable policy framework, which supports certainty and gives officers the confidence and space to do their jobs;
  - Investment in skill development at all levels, with apprenticeships flagged as an important way of supporting the planning profession;
  - Greater flexibility in respect of work/life balance, in order to increase the appeal of local authority planning for a range of groups;
  - Increased application fees, to support greater capacity and upskilling in planning teams.

1.6 Lessons from the Local Case Studies

Factors advancing RES include the following, which are evidenced by particular experiences emerging from the listed case studies. These experiences may of course by common to other areas, including the other case study areas discussed in this report.

High level political support is crucial	
Strong political leadership, manifesting itself as determined and positive processes and engagements, is key to RES delivery.	All case studies
Aspirational housing targets are valuable in headlining an area's ambition to combat socio-economic exclusions centered on housing market pressures.	Cornwall
Political support may beget local financial support, driving resources into schemes to ensure their viability.	Derbyshire Dales
A clear corporate focus on rural affordable housing, sometimes extending to direct local authority delivery (with development partners), will drive delivery across local authority housing and planning teams.	Winchester
Close working with communities, building evidence and support, provides the essential foundation for projects	
Key delivery partners (councils, RPs, and enablers) must engage in close working with communities, to evidence need, and to build support for affordable housing.	Cornwall/ North Norfolk
Use of secondary data and alternative approaches to monitor and map housing - need as the evidence base to support RES development e.g. Shropshire's online portal: the Right Home, Right Place initiative.	Shropshire
Community opposition poses a key challenge to rural development: development partners (local councils, RPs, and landowners) need to devise strong proposals that are well-evidenced, but also address community concerns around the scale and form of development.	Shropshire
Parish councils must navigate the contradiction between in-principle support for affordable housing and nervousness around specific sites. They need to work with partners, but avoid jumping at a particular site too quickly.	Derbyshire Dales
A strategic search for sites (tracking the SHLAA or SHELAA process) can help direct a local authority to conversations with particular Parish Councils and development partners.	Winchester
Building long term delivery partnerships results in smoother projects and reduced risk	
Strong, open, working relationships between all key development, community and landowner partners, resolving difficulties early on through open dialogue is vital.	North Norfolk
Investment in long-term relationships contributes to de-risking projects and smoothing planning processes.	Winchester

A trusted private development partner can play an important role in RP or local authority projects.	Winchester
A skilled RP partner, adept as working with the council and communities, and advancing powerful public interest arguments in favour of building rural affordable homes will help drive a programme of affordable housing delivery.	North Norfolk
Higher level strategic partnerships help maintain corporate focus on rural housing delivery, with positive implications for ground-level work, including the work of LA-based and independent RHE.	North Yorkshire
Local 'project management' of the development pipeline, involving local authority and RP partners working alongside the housing enabler, helps to maintain the focus on RES delivery.	North Yorkshire
Effective and sustainable LA-based and independent enabling provides projects with ongoing support	
Effective joint working between LA-based enabling officer(s) and independent RHEs (in this case, under the auspices of the HARAH programme) provides capacity and drives RES delivery.	Winchester
Rural housing enablers play a critical role building the enduring relationships that are key to successful rural exception site delivery.	North Yorkshire
RP-authority funding partnerships provide a means of securing long-term support for enablers, tied to housing delivery through the combination of an RP retention fee and a per-unit recharge mechanism.	North Yorkshire
Cross-subsidy arrangements that support delivery and affordability must adapt to different situations	
Tailored cross-subsidy policies that reflect local market realities (setting levels of permissible market housing components depending on land values) play a role in maximizing affordable housing delivery.	Cornwall
A pragmatic approach to cross-subsidy is one of a number of means of bringing sites to viability.	Winchester
Small projects can, in some circumstances, be made viable through a clear planning approach in instances where all affordable rural housing is exceptional, and none is on allocated sites.	Derbyshire Dales
'Linked schemes' (some with market housing and some without) where cross-subsidy is generated on higher value sites and is moved to support lower value schemes may be helpful. Such linking may face community resistance, where a particular village is being asked to host more housing – hence the importance of mobilizing strong public interest arguments.	North Norfolk

Mixed funding models, including direct council build, are crucial and will depend on local circumstances	
The potential of direct provision by councils, on allocated and exception sites, and of utilizing mixed funding that may include sustainable borrowing and HRA revenues, to support ambitious housing programmes, although where HRA revenues are utilized, the homes delivered will be subject to the Right to Buy.	Cornwall
Supportive planning and spatial development strategies provide a broader context for RES success	
Spatial development strategies that support a 'dispersed approach', utilizing a mix of allocated and exception sites, will advance the use of RES.	Cornwall/ Shropshire
RES outcomes cannot be 'unhitched' from the local plan: RES activity may decline during plan reviews if landowners perceive a chance of allocation. Local plans that allocate a significant number of housing sites may have less RES activity, whilst those with no allocated sites outside of larger towns, may have much more. This is particularly true of protected areas.	North Yorkshire
In areas of dispersed population, smaller settlements, and hence small market schemes, the exempting of developments (of 10 units or fewer) from contributing to affordable housing Section 106 agreements has potentially made it more difficult to fund smaller RES schemes (which then have to grow to achieve viability).This national policy, enacted in 2016, should be reversed in protected rural areas.	Shropshire

1.7 Mapping the key messages

Taken together, the different parts of the project allow us to map key messages, and unpack these into key actions. Whilst the project has focused on RES, these messages and actions apply to the delivery of all rural affordable housing:

The centrality of political support	A corporate emphasis on supporting RES is fundamental to the success of these small rural schemes; that corporate emphasis brings senior officer support and mobilises an ecosystem of activity, at all levels, that aims to evidence need, win support and bring forward sites for development.
	Action for LAs: clear messaging in support of affordable housing and its vital importance to rural communities is needed at an authority level, backed up by proactive planning and funding policies.
The critical role of enabling	Enabling comprises the independent RHE network and LA-based generic and rural enablers. Both play key roles in RES delivery, pointing to a need for additional LA capacity for enabling and a strengthened RHE network, with sustainable funding.
	Action for LAs and government: dedicated funding for rural housing enabling within local authorities plus consistent national and local funding to the independent Rural Housing Enabling network.

Adaptive cross-subsidy arrangements	Whilst clarity is needed on cross-subsidy, different places (and market circumstances) tend to need different arrangements. Clearer guidance is required on viability and land values (so planning authorities can design consistent policy within a national framework).
	Action for Government/Homes England: Issuing of national guidance to RES partners on viability, cross-subsidy, incentives, and land values – forming part of a broader RES (or 'rural affordable housing') toolkit.
Building delivery partnerships	Local authorities and delivery partners, including RPs and landowners, play critical roles in RES delivery. Coverage of RPs in remoter rural areas is crucial, as is local authority resourcing, and positive relationships with landowners, extending to good practice and guidance concerning cross-subsidy and landowner incentives.
	Action for Homes England: resourcing to rural authorities to reflect the challenges of working with multiple under-resourced partners, and incentives for RPs to extend their reach into under-served rural areas.
Working with communities	The case for affordable housing, and for RES, needs to be won among communities. This begins with robust evidence of need that hopefully underpins community support. But resistance can remain, requiring delivery partners to design clear, viable, and well-evidenced proposals.
	Action for Homes England and partner groups: a RES (or RAH) toolkit addressing practices and engagements, including via social media, that help win support for rural housing projects, whilst illustrating good practice in evidence gathering.
Funding flexibility and clarity	Local partners are innovating different funding solutions for RES, mixing various sources of grant funding and finance. This flexibility is important and different areas need to share their experiences. Homes England needs to be part of this conversation, working flexibly to support schemes that are 'outside the box' of standard practice, including linked RES schemes.
	Action for Homes England and partner groups: advice on mixed funding packages including in a RES (or RAH) toolkit (extending to linked subsidy schemes), and work with Homes England to support RES in under-served areas.
Supportive planning and spatial development strategies	Well-resourced local planning (and housing) can stay the course, possessing the skills and understanding to support RES. The National Planning Policy Framework needs to give clearer support to RES, underpinned by a 'toolbox' for supporting small rural housing schemes that takes its cue from the messages mapped here. Local plans are also crucial for RES: they must have spatial development strategies that support RES in lowest tier settlements, in order to advance the future sustainability of England's villages and rural communities.
	Action for government: NPPF to give clearer support to RES, stressing its value to rural communities and economies. NPPF to reference a future RES (or RAH) toolkit and underscore the sustainability arguments for a dispersed development approach in many rural areas.

PART 2: WHAT ARE RES AND WHY ARE THEY IMPORTANT?

2.1 Relative to in-area earnings, housing is often less affordable in rural parts of England than in larger towns and cities. A hundred years ago, rural housing was relatively inexpensive but also of poor quality. Counter-urbanisation during the second half of the twentieth century (i.e. more households choosing to relocate away from cities) and the establishment of a planning system that has sought to protect the countryside from development considered inappropriate, have brought demand and supply-side housing pressures to rural areas. Those pressures can be especially acute in smaller villages, where high demand for homes together with planning restriction (which allows fewer homes to be built) can mean reduced housing affordability for households, particularly those who work in the rural economy and whose wages are lower.

2.2 Those households need to live and work in the countryside. They are part of a wider labour force that supports rural economies, and also an integral part of rural communities. Access to good quality, affordable housing is essential to the wellbeing of those communities and economies. It supports the foundational economy and ensures that rural places are vibrant, mixed and fully-functioning. Historic sources of affordable housing – i.e. council homes built by rural district councils after 1919 – have been heavily depleted by the Right to Buy, which has had a disproportionate impact in rural compared to urban areas. Much of the housing built in rural parts of the country is now provided by the private sector.

2.3 But rising demand pressures, and supply constraints, drive up land prices and hence the cost of housing. During the past 30 years, one critical solution to this challenging dynamic has been 'rural exception sites' (introduced in DoE Circular 7/91). The value of land is determined by its best permissible use. This means, for example, that land where only rough grazing is possible and permissible, commands a far lower price than high quality farmland. However, the highest price will be paid for land allocated to residential use. Given demand pressures, such land will attract speculative interest and, depending on location, will command a price hundreds of times greater than land used for grazing animals or land where 'market housing' will not be permitted by a planning authority.

2.4 The RES mechanism seeks to bring land forward land for non-market development at a price that supports the delivery of affordable housing for local need. A lower land price will mean a lower development cost, and therefore an opportunity to build homes that can be rented to local households at an affordable price. The key parties involved in a RES include: the community (which sees the need for affordable housing), the landowner (with a site suitable for a RES), the local planning authority (which has

produced a local plan containing policies to facilitate development on a RES), a registered provider of social housing (which is attracted to a development opportunity that furthers its social mission), and either an LA-based enabling officer (sitting in the local authority's housing department) or an independent Rural Housing Enabler (RHE) that may play a central role in brokering a relationship between all these parties.

2.5 RES can start and progress in different ways. There is no fixed formula and additional actors may participate in the process: for example, agents representing the landowner, or Community Land Trusts looking for opportunities to build affordable homes. Typically, an enabler – either an LA-based one or an independent – will seek to support a community to get the affordable homes it needs and, to that end, will facilitate a deal between key stakeholders. Those stakeholders will include a (generally) supportive community (which has been involved in the gathering of evidence of local need that could be met via a RES); a landowner who has expressed a willingness to release land at a price which would support affordable housing; and an RP whose mission is to deliver affordable homes and who sees an opportunity to deliver a financially viable scheme. Outside of that deal, the local authority's housing and planning departments will fulfil enabling and development management roles: housing officers may well be involved in driving the project (especially where there is no independent RHE), whilst planning officers will offer advice on the feasibility of developing specific sites. Relationships need to be strong and durable, as small rural housing projects can take several years to come to fruition.

2.6 Between 2017 and 2022, more than 3,500 homes were provided on RES across rural England (see Map 1). Set against national housing supply, this can seem like a small number, but RES are immensely important to those communities struggling to increase their supply of affordable homes, and even more important to the households whose livelihoods depend on access to those homes. However, data also show that just 548 affordable homes on exception sites were delivered in 2021-22 compared with almost 800 in 2017-18. The difficulties of progressing sites through the Covid-19 pandemic may explain some of this fall, although it is clear that RES face persistent challenges that need to be better understood if they are to be overcome.

Map 1: Affordable homes on RES sites, 2017 to 2022, by local authority area

5 Year RES Total

- 0 - 7
- 7 - 25
- 25 - 58
- 58 - 101
- 101 - 264
- 264 - 1097

0   50   100   150 km
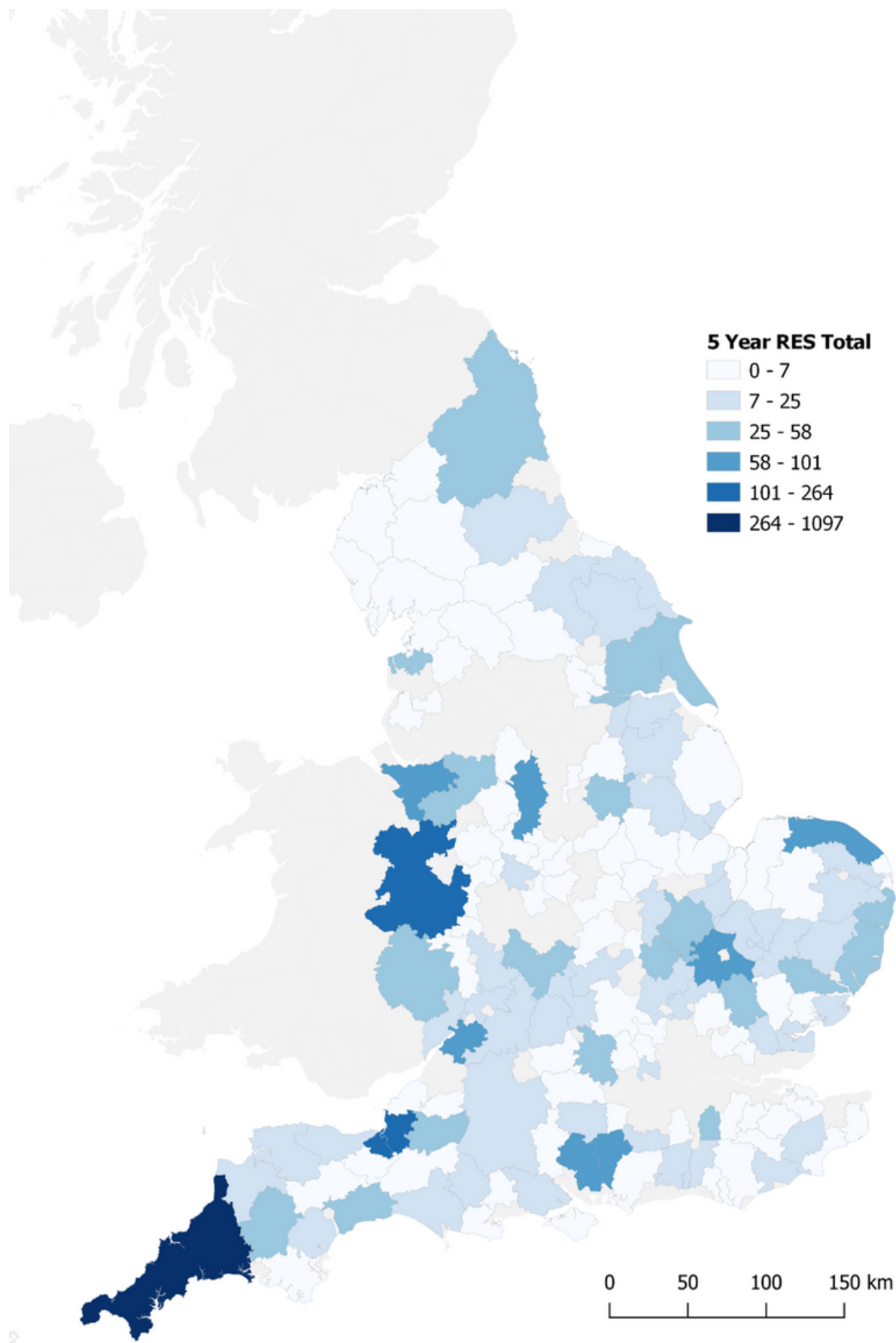
PART 3: THE GOALS AND METHODS OF THIS RESEARCH

3.1 This project sought to address one overarching question:

How should prospective RES schemes maximise their chances of success and avoid potential pitfalls?

In other words, is there a 'winning formula' that might be followed by projects everywhere, increasing the likelihood of success and minimising the chances of failure? This is the question that we turn to at the end of this report.

Whilst being undertaken, the project was guided by more functional questions that sought to address its two key foci: on the planning resources needed to support RES and the local factors that shape outcomes. The overall guiding question was this:

What underpins success in the delivery of RES?

This was split into two 'resourcing' and one 'factors' components, i.e.:

1. How does LA resourcing of the planning function affect the success of RES?
2. How can LAs mitigate resource shortcomings through local working practices and innovations?
3. Besides planning resourcing, what other factors/practices/policies underpin successful RES schemes?

In order to address these questions, the project moved through 5 stages:

- **A review of existing published research, with findings now presented in Part 3**
- **Baselining conversations with Steering Group members, reported in Part 4**
- **The collation of publicly available data for rural planning authorities, on RES delivery and planning performance for last 5 years, which augments the survey findings presented in Part 5**
- **A survey of rural planning authorities, requesting self-assessment of the nature of local resource constraints, impacts of constraints (for the broader planning function and for RES or small rural site delivery), and mitigation strategies, reported in Part 5**
- **Case studies of six rural authorities with strong track-records of RES delivery. These are detailed in Part 6 with key learning extracted from longer presented narratives.**

The ultimate goal was to produce a report that addresses the 'how should' question noted above. Part 7 of the report tries to do exactly that.

PART 4: KEY MESSAGES FROM PAST STUDIES

4.1 This is not the first study to examine the progression of RES and their contribution to affordable housing supply in village locations. A full literature review is appended to this report. For the sake of brevity, only a tabular summary of the review is included here.

Table 1: Factors including resourcing affecting RES, from literature

Community engagement and support	Getting the community on board by winning the argument that affordable housing is key to economic and community vitality is a prerequisite for RES success
Land cost	Rising land costs and landowner price expectations are a barrier to RES, but working with landowners to secure land at the right price is critical to success
Community governance and parish councils	Governance structures, and particularly parish councils, bring together critical interests. This is where the case for affordable housing is won, and where landowners interface with communities
Rural housing enablers	Success can hinge on the work of housing enablers (either LA-based or independent), their store of knowledge and experience, and their capacity to be honest brokers and maintain the momentum of RES projects
Effective partnerships	Partners have different motivations and roles in the RES process. The ambition of community activism can grate against normative systems, of planning and finance. Effective partnerships are supportive of different interests and manage expectations
The policy framework	The policy framework extends from national policy to local plans. The former need to be stable and give certainty to local projects. Plans need to have clear but flexible policies that support RES in different situations
The funding regime	Access to funding is critical to RES success. This frequently means accessing Homes England grants. RPs have a critical role to play in securing funding and finance for RES, through their access to grants and through their ability to secure loans. Local authorities are also key funders, using a mix of borrowing, Section 106 revenues, and capital receipts.

Build costs	Build costs can undermine the 'value for money' (and viability) that RPs seek from RES schemes. The current inflationary environment is particularly challenging for small schemes, which are unable to capture economies of scale. It is these lack of economies of scale and remoteness that results in RES development being more costly than building in towns and cities
First homes exceptions	RES work by securing land at a price that will support the affordability of homes built. Land price is determined by best permissible use. If 'first homes', which are an affordable sale product, become best permissible use, RPs and their partners will struggle to access land at a price that supports the delivery of rented homes
Resourcing for local planning services	A quarter of planning authorities in England have no local plan and a third of plans that are in place are out of date. Central funding to planning has dropped by more than 40% over the last twelve years. Planning teams are afflicted by high workloads and low morale. This is impacting the strategic functions of authorities, including plan making, and leading to longer turnaround times for applications. Resource cuts have been concomitant with the laying of new duties on planning authorities.

5.1 The steering group for this project comprised individuals representing major Registered Providers (Trent & Dove, Hastoe, English Rural and Coastline), Landowners (The Country Land and Business Association), the key funding body (Homes England), the responsible government department for housing (DLUHC), the voluntary network supporting independent rural housing enablers (ACRE), the representative body of social housing providers (NHF), and a key consultant supporting rural affordable housing delivery (Rural Housing Solutions).

5.2 We were therefore presented with an opportunity to establish a baseline of existing knowledge to carry forward into this project, using the coalface and policy insights of steering group members to construct a framework of 'success factors' (and pitfalls) and 'resourcing issues' that would be further investigated in a national on-line survey of local planning authorities (classified as largely or mainly rural, or urban with significant rural parts) and six local cases studies of policy design and project delivery.

5.3 Nine interviews were held with thirteen steering group members in February 2023. These addressed the following questions:

1. What has to 'go right' for an RES to be successful? (e.g. evidence of need; community support/effective community liaison; enabling; willing landowner; RP partner; clear and proactive planning policy; stamina among key partners; trust; etc.)
2. What 'goes wrong' where an RES fails or where an RES is not feasible?
3. What resource constraints are faced by rural planning authorities?
4. What impacts do these have, on the planning service or housing delivery in general, or on RES more specifically?
5. How are rural authorities mitigating those constraints?

5.4 All interviews were conducted on-line, auto-transcribed and immediately summarised. Those summaries were used to construct two significant tables, revealing the reasons why RES schemes succeed or fail (Table 2), and the nature of resourcing constraints affecting local planning authorities, alongside the impacts of those constraints and potential mitigations (Table 3).

Baselining Conversations: Key delivery factors

Why RES schemes succeed

5.5 Four prominent success factors were agreed upon by interviewees: building and sustaining community support for a project; partnering a land owner who is willing to sell land at a price that will allow affordable homes to be built; having 'higher political support' within the local authority; and working with an 'honest broker' (often an independent RHE or LA-based enabler, but not always) who will champion a project and keep it moving.

5.6 Whilst these were the top-cited factors, others are also clearly important, and their slightly lower ranking might be due to the fact that only project-level actors drew attention to them. These include, for example, being able to engage with knowledgeable planning officers at pre-app stage, and pursuing a project that will offer clear value for money and will attract grant funding.

5.7 Again, the full range of success factors are listed in the left column of Table 2.

Table 2: Why RES schemes succeed or fail

Factors driving success	Causes of failure
Clear community support (8)	Lack of community support (6)
Landowner support (6)	Lack of sites / lack of landowner engagement or enthusiasm (3)
Higher political support (5)	Lack of political support (5)
Enabling Officer / RHE or local champion as honest broker (5)	Weak enabling (5)
Knowledgeable planning officers engaging in constructive pre-app (4)	Lack of planning capacity (4)
Proactive partnerships that deliver collective understanding (3)	No locally-active RP partners (1)
Clarity of planning policies (3)	Time: slow and fragmented planning (5) and/or technical planning hurdles (3)
Funding availability and flexibility (3)	Funding challenges (2)
Value for money of the project (2)	Rising planning and build costs (5) linking to inflated land price expectation (3) and problematic economies of scale (1)
Intra-authority enabling arrangements (2)	Lack of support for enabling (2)
Stamina, resilience and enthusiasm (2)	Lack of energy (2)
Non RP-led models, including CLTs (2)	No CLTs, no other pathways (2)
Clear evidence baseline (1)	Weak evidence (1)

NB: Bracketed numbers denote times mentioned

Why RES schemes fail

5.8 Obviously, reasons for failure are the inverse of success factors: so - not having community support, a willing landowner, higher level political support, or a project champion.

5.9 However, interviewees drew attention to three particular factors that seemed to sink RES schemes, beyond these inversions. The first of these was a lack of community support, leaning into entrenched NIMBYism. The second was 'time' and in particular the time-cost of a slow and fragmented planning process, which struggles with more technical considerations (possibly because of a lack of requisite skills within a planning authority). And the third was cited as 'rising planning and build costs'. Whilst this final reason for failure was viewed as a product of the current inflationary environment (in 2023), overall costs are more generally inflated by land price expectations, especially where a land agent is raising the expectations of the owner, and by the problematic 'economies of scale' that always affect small sites.

5.10 Table 2 provided a framework of delivery factors investigated at the case study stage.

Baselining Conversations: Planning Resources

The nature of planning resource constraints

5.11 Interviewees were asked to reflect on resource challenges facing local planning authorities. Most of those interviewed were on the housing delivery side (i.e. representing Registered Providers) or from national bodies that maintained regular contact with planning teams. However, the purpose of the interviews was to identify cues for further research that would focus on actual local authority situations in England.

5.12 Two prominent resource constraints stood out from the interviews: first, a shortage of planning officers within authorities and consequent high workloads; and second, the lack and loss of knowledge and experience associated with having too few senior officers (because they had retired or left and not been replaced). Some interviews suggested that the plight of planning authorities was shared across the public sector: under-funding is generally resulting in a deficiency of resource.

Table 3: Resource challenges faced by local planning authorities

Constraints	Implications	Mitigations
Shortage of planning officers/high workloads (6)	Slow service, draining enthusiasm of partners (4)	Invest in LA-based enablers/RHEs/hubs to support planning function (5)

Constraints	Implications	Mitigations
Loss of knowledge and experience (4)	LPAs refocus on strategic priorities (4)	Simplified two-stage rule-based RES policy (PIP) (4)
Underfunding of local government and other partners (3)	RES assigned low priority/fewer RES (3)	Outsourcing (3)
Too many technical duties (2)	Informal advice lost and pre-app advice poor quality (2)	Training and sharing best practice (2)
Recruitment challenges (1)	Fail to gain political support (lack of evidence, etc.) (1)	View res as a strategic priority (2)
-	Enabling function lost (1)	RPs funding technical services (2)
-	No updated local plan (1)	Stronger corporate leadership (1)
-	Uncertainty and risk causes scaling back of RES projects (1)	Inter-LPA service sharing (1)
-	Planning stalls, costs rise (1)	Frontload resources to pre-app (1)
-	Lack of technical capacities (1)	Junior recruitment and apprentices (1)
-	-	Stability in the planning framework (1)
-	-	Positive 'can do' culture in planning (1)

NB: Bracketed numbers denote times mentioned

5.13 As Table 3 shows, some interviewees felt that the resource constraints were being compounded by recruitment challenges and by the widening array of technical duties being placed on planning authorities.

The impacts of resource constraints

5.14 A much longer list of impacts attributable to resource constraints emerged from the interviews. Three were prominent. First, inadequate resourcing (i.e. too few officers) resulted in a slow planning service that could drain enthusiasm from small rural housing schemes. This slow service was responsible for the 'time' factor in RES failure. Second and third, authorities enduring resource constraints devote the resources they have to strategic priorities at the expense of smaller rural projects. This means that fewer RES schemes come forward or are supported by planning authorities. A reduction in RES may result from a lack of resource investment in pre-app

discussions with Registered Providers, which are therefore more cautious about pursuing opportunities given the perception of greater uncertainty and therefore risk.

Mitigating resource constraints

5.15 How might local planning authorities adapt to this lower resourcing environment? The list of potential mitigations was partly speculative and partly rooted in experience. Three strategies were prominent: first, invest in enabling (either LA-based enablers or independent RHE) as a means of stretching limited resources. Rural Housing Enablers (LA-based or independent) were thought to be good value for money and able to add capacity to stretched local authorities. Second, reduce the planning bureaucracy associated with RES schemes by implementing a two-stage rule-based approach to these schemes (using the 'Permission in Principle' mechanism). Once sites have been identified, permission for a RES should be fixed in principle so the scheme only requires second stage technical consent. This may seem to be a highly technical and specific remedy to broader resource constraints. One of the Steering Group members interviewed had previously advocated this approach and its logic was known to other members. The third most cited strategy was out-sourcing: building capacity by contracting out functions to consultants.

5.16 A longer list of more varied mitigations was proposed by interviewees: perhaps notable amongst these were 'training and the sharing of best practice' and stronger corporate leadership that fosters a 'can do' attitude within local authorities. Not all of those interviewed felt that problems in the planning service could be traced to resourcing. It was also argued that the profession had retrenched into negativity. There could be a number of reasons for this, but broader denigration of planning and planners was considered a potential contributory factor.

PART 6: FINDINGS FROM THE NATIONAL SURVEY OF PLANNING RESOURCING

6.1 A survey of rural planning authorities was conducted as part of this research. That survey sought to gain a clearer picture of the resource constraints facing authorities, the impacts of those constraints, and the workability of different mitigations. Map 2 shows, in varying shades of green, the three types of Local Planning Authorities (using DEFRA's definition of rural urban areas) targeted for this research. National Park Authorities are not shown but all were contacted. A summary of the responses received, split according to region and local authority type, is provided in Table 4.

Map 2: Rural England – Districts and Unitary Authorities surveyed
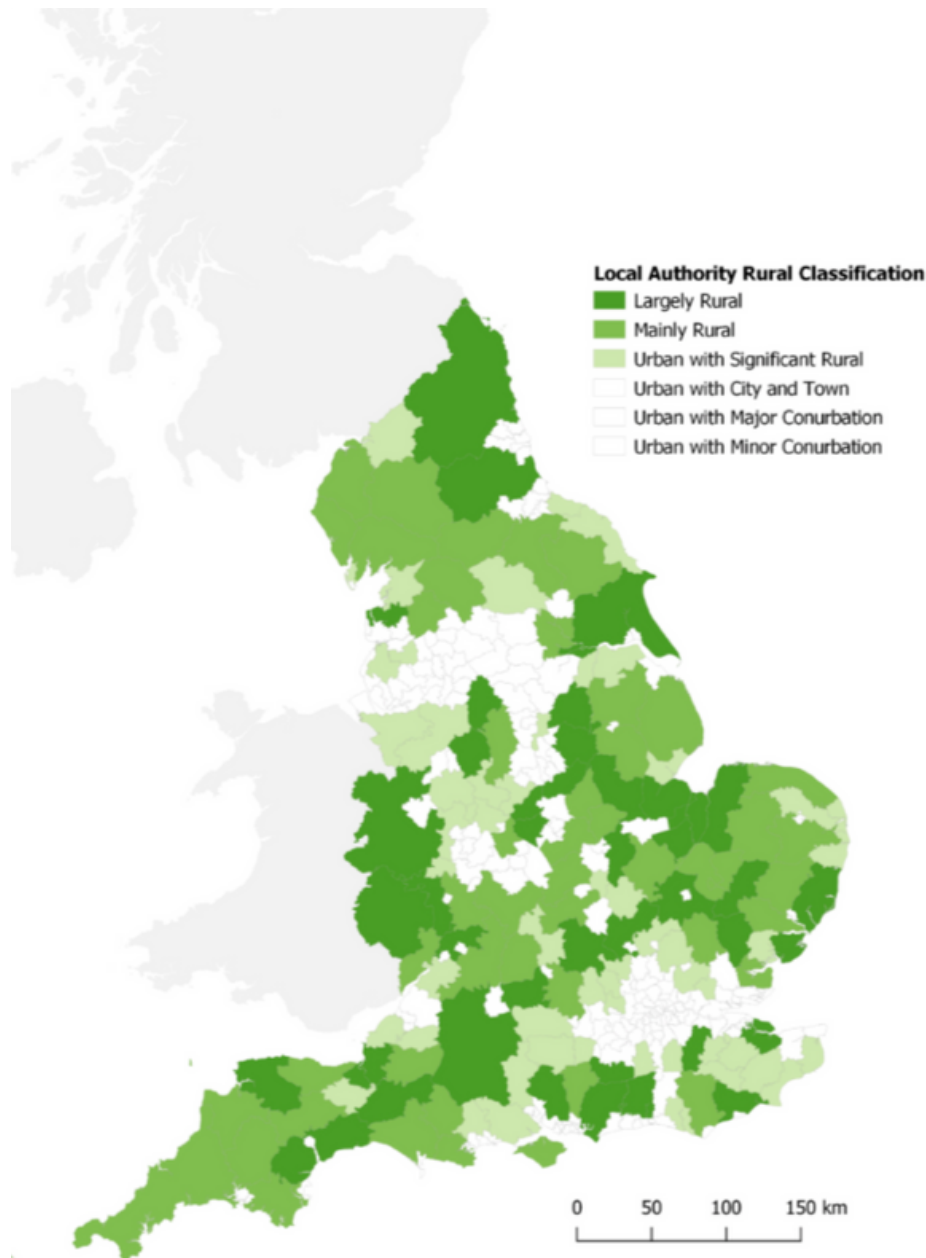
Table 4: Regional distribution of responding authorities, and type of authority

Regional responses	Total	District	Unitary	National Park	Within combined
East of England	7	5	2		
South East	8	4	2	2	
South West	9	2	5	2	
North West	3	1	1	1	
North East	2		2		(2)
Yorkshire and the Humber	3		1	2	
East Midlands	2	1		1	
West Midlands	6	5	1		

Designing the questionnaire and survey

6.2 Using the feedback provided by the baselining conversations (summarised in Tables 2 and 3), an on-line questionnaire was designed and dispatched to local planning authorities across rural England. The questionnaire provided lead planning officers with an opportunity to self-assess in three areas:

1. The nature and severity of resource constraints affecting each local authority.
2. The impacts of those constraints on the general planning service and on the delivery of small rural housing sites.
3. Perceptions of the operability and value of different mitigation strategies, leading to an assessment of resourcing priorities.

6.3 The questionnaire (Appendix 3) comprised 61 questions, roughly divided between these three areas. It was initially tested within the research team, then tested with a small sample of planning officers (for sense, logic, and functionality), and then reviewed with Steering Group members. Following content adjustments, the survey was administered on-line using MS Forms and distributed to 157 local planning authorities (mainly districts, but also unitary authorities and national park authorities) on behalf of the research team by the Rural Services Network.

6.4 Only authorities classified as 'mainly rural' (rural >= 80%), 'largely rural' (rural = 50 to 79%) and 'urban with significant rural' (rural = 26 to 49%) (based on the 2011 DEFRA

classification), or other authorities that had delivered affordable homes on RES sites during the last 5 years (there were just two of these, both 'urban with city or town'), were included in the survey sample.

Responses received

6.5 A total of 46 questionnaires were returned from 40 planning authorities. Duplicate returns were discarded for the survey results, although comments from individual respondents were retained for the analysis.

6.5 Respondents had worked in the planning sector for an average of 24 years, and an average of 12 years in their current authority. Of the 46 respondents, 17 were Directors, Assistant or Deputy Directors, Chief, Head or Principal Planners; the remainder were Managers or Officers with responsibility for Planning Policy, Development Management, Spatial Planning, Planning Services, Housing Delivery, Development, Infrastructure or Neighbourhood Planning. Responses came from all of England's regions and all types of planning authority (see Table 4).

Planning teams and vacancies

6.6 The average number of planners in responding authorities was 37, ranging from 3 to 130. Thirty-two (32) out of the forty individual authorities reported vacancies within their teams, ranging from 1 to 12, and an average of 3.7 vacancies per authority.

6.7 In commenting on the high number of vacancies, respondents referred to difficulties in recruitment of senior and/or experienced planners, and the need to compensate with additional training for graduate or less experienced recruits. Apprenticeship schemes were often singled out for praise in respect of giving opportunities for career progression. A lack of specialists can delay planning decisions, and pressure on budgets has meant that salaries are no longer competitive with those in the private sector. One respondent commented that the shift of some planning service jobs to an outsourced private company had led to worsening terms of employment without the same opportunities for progression and promotion.

Theme 1: The nature and severity of resource constraints affecting each planning authority

Resourcing and work pressure

6.8 More than 65% of responding authorities felt they did not have the resources (workforce and skills) to fulfil their statutory duties, nor to engage informally with their communities and development partners.

6.9 Two National Park Authorities had suspended their pre-app advice service, while

four others spoke of a 'reduced capacity' to offer such advice, or a 'difficulty to offer informal advice' or being unable to engage informally with development partners while 'timescales for pre-app advice are increasingly long'.

6.10 Forty out of 46 respondents agreed or strongly agreed that planning officers face a high degree of pressure at work. Pressure at work was reported to lead to a higher rate of staff
turnover. Despite this, morale appeared to be relatively balanced, neither extremely good nor extremely poor. Most respondents felt that planning departments had the experience and expertise to deliver an effective service despite earlier comments regarding the recruitment of specialists and senior planners. Two respondents referred to the need to prioritise larger developments at the expense of RES due to resource constraints.

Policy uncertainty and new requirements

6.11 Policy uncertainty, alongside new requirements such as nutrient neutrality, was cited as the biggest obstacle preventing the consistent delivery of decisions – with 83% of respondents citing this as the cause of increasing pressure on the service. In contrast, one respondent commented that '[...] the wide range of duties is what makes the planning role interesting; there is always something new, such as bio-diversity net gain and nutrient neutrality. This should be attractive to professionals.' Despite increasing demands on planning teams, one respondent commented that the timeframe for decision making on new developments had not changed since 1947.

Home working

6.12 Only 2% of respondents felt that working from home had made the planning service less efficient, while 58% were undecided, offering mixed views on the advantages and disadvantages. Less time spent travelling to and from offices meant that officers could spend more time on caseloads each day. However, there were fewer opportunities to share knowledge and experience with colleagues.

Theme 2: The impacts of those constraints on the general planning service and on the delivery of small rural housing sites

General impacts

6.13 Despite the lack of resource described in the previous section, 60% of respondents believed that decisions were given on time and to an expected quality without the need to seek extensions of time. In addition, a clear majority of respondents felt that their authority had the resources to deliver their Local Plan, even if particular expertise had to be 'bought in' on a consultancy basis.

Small rural sites

6.14 Regarding delivery of affordable housing on RES, very few respondents were aware of, or had experience of involvement in, exception sites. Only two respondents confirmed that their authorities were delivering more than 'one or two' homes on RES per year. The answers to the questions in this section suggested a prioritisation of larger allocated sites due to resource constraints, with many respondents neither agreeing or disagreeing with the statements concerning small rural sites.

6.15 Some respondents considered that (broader) engagement with communities, RPs, external agencies or landowners was the responsibility of their housing departments. One respondent commented that 'it is not the role of the LPA to propose or prepare/develop the evidence in support of Rural Exception Sites as, by their very definition, they are proposals for (predominantly) affordable housing on small parcels of land that would not normally be developed for housing. It is for the applicant to prepare and submit the necessary evidence (including of local affordable housing needs), and the Council will consider that evidence as part of determining the planning application in accordance with development plan policies and other material considerations.'

6.16 One local authority respondent commented that 'we do not have rural exception sites'. Another said that despite having RES policies in their Local Plan, 'RES proposals are virtually unknown'.

6.17 Of course, authorities without RES or with only a small number of RES coming forward will wish to stress that questions are not relevant. Results suggested a general prioritisation of allocated sites which is likely to be due to the resource needs of larger applications and the as-and-when incidental nature of RES in many cases.

Theme 3: Perceptions of the operability and value of different mitigation strategies

Enabling

6.18 Exactly half of all local authority respondents agreed that working with an LA-based or independent RHE was an effective means of supporting housing delivery. It was clear that some respondents had in mind 'generic' enabling officers working on allocated sites, whilst others were referring more specifically to rural specialists and independent RHEs focused on small rural sites. However, there was strong overall support for dedicated enabling activities.

Consultants and training

6.19 Whilst the majority of respondents felt that out-sourcing some planning tasks to

consultants could occasionally generate efficiencies and increase cost-effectiveness, none had used consultants to assist with RES schemes. It was not clear what additional capacity consultants might bring, beyond that brought by LA-based or independent enablers.

6.20 Within planning authorities, it was not felt that additional training would help officers deliver homes on RES. Linking to earlier findings, respondents had already stated that the major responsibility for RES lay with their housing colleagues (see 6.13) and that the planning role was confined mainly to development management.

Sharing good practice and staff

6.21 Seventy-eight (78%) percent of respondents believed that systematic sharing of good practice could enhance the delivery capacity of planning authorities, in general terms and in relation to small rural housing schemes where applicable. Seventy-one (71%) said that this was
already happening and that best practice was being shared across neighbouring authorities.

6.22 Only 19% believed that the 'informal sharing of staff' would mitigate resource constraints, believing instead that it would more likely denude their own capacity to deliver. Moreover, the formal sharing of staff via 'shared service' arrangements was not viewed as an effective mitigation to resource constraints: only 15% thought that it would bring benefits to their authority.

6.23 However, 47% of respondents agreed that planning authorities are able to mitigate resource constraints by changing working practices, partnering with others, and making less go further, which appears to be at odds with the apparent reticence around sharing staff resource, informally or formally. Such contradictions may suggest concerns around capacity paired with uncertainty around the best ways forward. Authorities learning from one another was judged to have clear benefits, but those same authorities view dedicated in-house resources, which allow them to guarantee a high quality and timely planning service, as being key to overall delivery.

Key measures for addressing resourcing

6.24 When asked about measures that could potentially deliver greatest impact on performance, 87% of respondents referenced a need to fill senior posts. Being able to recruit and retain senior staff would not only add capacity but also bring people into authorities who are able to guide and inspire junior staff: experienced innovators, able to create new efficiencies.

6.25 Others asked for increased clarity in Government policy, especially in respect of housing targets. New systems for the processing of development applications were also

thought to be essential, alongside training specifically on the assessment of new requirements.

6.26 Ninety-two (92%) of planning authority respondents said that staff retention and skill development were the resourcing priorities within their departments.

6.27 In response to our invitation for general comments on key actions that might be taken to support planning teams, the following were flagged as vital:
- Incentives for the retention of senior staff, encouraging them to stay in post or return to planning;
- Greater flexibility in respect of work/life balance, in order to increase the appeal of local authority planning for a range of groups;
- Increased application fees, to support greater capacity and upskilling in planning teams;
- Greater certainty in the planning system, providing local authorities with the confidence to invest time and resource in dealing with planning applications. Related to this, it was argued that there is a need to manage public expectations around new development, to ensure that it is more readily accepted rather than automatically opposed. This is about making the case for housing – a theme that also emerged in the case studies.

7.1 Six case studies are presented in this part of the report. These are 'deep dives' into local experiences of delivering affordable homes on RES. They look across higher level strategy, and the support given to rural housing delivery, and at project-level processes. Case studies begin by detailing the planning policy context, before 'first-level' interviews explore corporate priorities and 'project-level' interviews detail delivery narratives.

7.2 The choice of case studies, listed in Table 5, was agreed with the Steering Group late in March 2023. England's 'top performing' rural authorities – in terms of affordable homes delivered on RES – are revealed in local authority statistical returns (Table 6 – and see also Map 1). Our objectives when selecting case study authorities were as follows:

- To achieve a good geographical spread across England;
- To include a mix of authority types – single tier and unitary;
- To include authorities adopting different strategic approaches to supporting RES schemes;
- To have a broad choice of delivered schemes from which generalizable lessons might be gained.

7.3 Five of our selected case studies are amongst the top-10 authorities for affordable housing delivery on RES sites. North Yorkshire is not on that list because it is a new unitary authority (formed in April 2023) covering the old districts of Craven, Hambleton, Harrogate, Richmondshire, Ryedale, Scarborough and Selby. A total of fifty-one affordable homes were delivered on RES between 2017 and 2022 across the old North Yorkshire districts. North Yorkshire was a special case, not focused on project delivery but on strategic support for rural housing enabling.

Table 5: Case study authorities

Authority	Type	NPA	Region	Focus
Cornwall	Unitary (mainly rural)		South West	Cross subsidy on RES
Shropshire	Unitary (largely rural)		West Midlands	General

Derbyshire	District (mainly rural)	*	East Midlands	General
Winchester	District (largely rural)	*	South East	Focus on use of RHEs
North Norfolk	District (mainly rural)	*	East	General
North Yorkshire	County (7 districts and 4 unitary authorities)	*	Yorkshire and Humber	Strategic partnership in support of rural housing enablers

* Case study local authority has a National Park Authority (NPA) in its area; two in the case of North Yorkshire.

Table 6: Local authorities with the most affordable homes on RES, 2017 to 2022

Local Authority	Number of affordable homes
Cornwall*	1097
Shropshire*	264
Sedgemoor	185
North Norfolk*	101
Derbyshire Dales*	93
South Cambridgeshire	89
Cheshire West and Chester	86
East Hampshire	85
Winchester*	68
Stroud	65
North Yorkshire*	51

Source: Local Authority Housing Statistical Data Returns, Affordable Housing Supply, 2017-2022 (*Case Studies)

7.4 Two broad distinctions in the case studies, notable at the outset, are approaches to the use of cross-subsidy (some more cautious, and others more flexible) and the complication that comes from housing authorities working with separate national park (planning) authorities. It is noted in Table 5 that three of the case studies involved a

district authority paired with a national park (Derbyshire Dales and the Peak District National Park; Winchester City and the South Downs National Park; and North Norfolk and the Broads Authority), and one unitary with two national parks (North Yorkshire and the Yorkshire Dales and North Yorkshire Moors National Parks).

Case study approach

7.5 The case studies build on the framework of key delivery and resourcing factors introduced in Part 4. Baselining conversations with steering group members identified general issues to be investigated in the cases. The broader approach has been to use authority-level contacts as entry points to the cases before 'snowballing' into further general and project level interviews. Each case study draws on 5 interviews with key informants split between 'first-level' (authority/corporate strategy) and the 'project-level'.

7.6 The aim of that split (in all the cases apart from North Yorkshire – see below) was to establish the 'corporate approach' framing RES delivery in the cases, before investigating how that approach affected the progression of projects. For example, Cornwall was known to place special emphasis on cross-subsidy on larger-than-typical RES; and Winchester was known to have adopted a strategic focus on rural enabling. North Yorkshire was planned as a special case, with an exclusive focus on strategic support for rural housing enablers through the York, North Yorkshire & East Riding Strategic Housing Partnership (YNYER - SHP).

7.7 Case studies had four main parts, shown in Table 7. The goal of the cases was to track the delivery of RES projects, how they gain support from higher level strategy, and sequence the factors that are key to delivery.

Table 7: Three-part case studies

Planning policy context	General area overview including administrative structure Rural geography and characteristics Local plan status; RES policies RES delivery (as component of general affordable housing supply) Planning performance

First level – strategy and corporate priority	• Perceived importance of affordable housing to rural communities and economies • Housing and development pressures • Focus on RES policies and their use

↓

	• Corporate approach to rural housing / RES delivery • Place of affordable housing in wider strategic framework • General structures and partnership working
Informants	• Planning and housing leads (or substitutes)

↓

Project-level (a)	• Profiling of location and project • Use of planning portal data where available (key dates, key partners, community reaction etc.)
Project-level (b)	• Focus on success factors and barriers - General mapping of the project – sequence of events - Notable events, engagements, etc. • Cues taken from Table 2 - Building and sustaining community support (+) - Building relationships with landowner (+) - Higher level political buy-in (+) - Role of champion or RHE (+) - Support from planning, including at pre-app (+) - Managing risk of losing community support (-) - Fragmentation or technical hurdles in planning (-) - Addressing land costs and rising build costs (-) - Etc.
Informants	• Community (e.g. Parish Council); Landowner or agent; RP or Enabler

↓

Key Learning	Key learning from the case in the form of 3 to 5 main messages Categorisation of key learning in Table 8, forming the main output from the local cases studies.

Case Study 1: Cornwall

7.8 Each of the case studies was analysed in a template that followed the above sequencing.

Case Study 1: Cornwall – strong political support, tailored cross-subsidy policies, and mixed mode delivery including council-led models

Planning Policy Context

Cornwall is a large unitary authority located in the South West of England. It is bordered on three sides by the sea and by Devon to the east. Its location – at the extreme south-western tip of the country – and the sense of closure, and relative isolation, that its geography affords have incubated a strong Cornish identity, reflected not only in everyday culture but also in the culture of policy and planning practice. Cornwall became a Unitary Authority in 2009.

More than half a million people reside in this 'mainly rural' authority: four-fifths in areas judged rural or rural hub towns. Cornwall adopted its Local Plan in November 2016 and is not currently engaged in a plan review. However, the plan is said to provide a framework for development in Cornwall that runs until 2030. Policy 9 of the Local Plan refers to RES: 'Development proposals on sites outside of, but adjacent to, the existing built up area of smaller towns, villages and hamlets, whose primary purpose is to provide affordable housing to meet local needs will be supported where they are clearly affordable housing led and would be well related to the physical form of the settlement and appropriate in scale, character and appearance'. Critically, the policy supports market housing on RES, where it comprises no more than 50% of the total number of units or 50% of the land take, 'excluding infrastructure and services'.

Cornwall Council has supported a significant number of affordable homes on RES. Local authority statistical returns show that 1,097 units were delivered in the five years to 2022. Nearly a third (31%) of all affordable homes on RES in England were delivered in Cornwall during this period. Because Cornwall is a large authority, in terms of population, we might also consider RES output according to population. On that measure, Cornwall (with 33.6 affordable homes per 10,000 residents between 2017 and 2022) was second only to Sedgemoor on RES output. It also delivers an efficient planning service: it made decisions on over 12,600 non-major applications in the 24 months to September 2022, turning 84.5% of these around within 8 weeks.

Cornwall is a successful planning authority, in terms of securing affordable homes on RES and processing planning applications at a time of significant pressure on planning resources. he overall housing delivery target for the County (between 2017 and 2020) of 7,263 was exceeded by almost 2,400 homes; at the time, the Council could demonstrate 6.5 years land supply, with land sufficient for 33,194 homes between 2020 and 2030.

First level – strategy and corporate priority

First-level interviews were conducted with the Principal Rural Housing Enabler and Affordable Housing Manager, as well as the Planning Policy Manager for the authority. These focused on the general approach to supporting affordable housing delivery on RES.

There is strong political support for affordable housing delivery in Cornwall Council, which has been maintained through recent changes (the Conservative group took control following elections in 2021). In 2017, a commitment was made by the Council to build 1,000 affordable homes within 4 years. Delivery of those homes was achieved by 2021, after which a new target of 1,700 additional affordable homes by 2028 was set. There is one full-time RHE and nine generic, full-time, Affordable Housing Officers in Cornwall. These work closely with more than a dozen RPs and multiple large landowners, including the Church Commissioners and the Duchy of Cornwall. Cornwall Council – in the form of the districts, before the unitary authority was formed – was an early adopter of development on RES, as also pioneered a cross-subsidy approach, through a departures policy, prior the revision of the NPPF in 2012.

The scale of RES projects ranges from single homes (often self-built) to developments of between 20 and 30 homes, mainly in villages but occasionally on the edges of towns. Support for delivering affordable housing exists at every level - 'It's so ingrained in the policy and delivery approach that it's almost entirely normal for us now' – although it sometimes breaks down at the very local level, when actual sites need to be selected for development and communities may reject development in the 'wrong places'.

A 2018 grant of over £5 million from the Community Homes Fund (CHF) has been used to build delivery capacity, including the extension of financial assistance to the Cornwall Community Land Trust (established in 2016), which supports local groups working on individual projects. There are currently seven CLT schemes either on-site or at the planning stage. Although it was recognised that CLTs play a vital part in delivery, they do not offer a complete solution to the challenge of supplying affordable rural homes. Many work in partnership with RPs who can help with access to development funding, or ultimately manage the homes built. CLTs, however, can be the catalysts for getting schemes into play.

As in North Norfolk (see Case 5), support from the CHF round recognised the high proportion of second homes affecting Cornwall's housing market and hence the need for affordable housing solutions. Money was allocated for land remediation, including sites affected by past mining activities, and for seed-corning (with individual grants of up to £40,000) project feasibility studies that community groups wished to undertaken, with the support of the RHE.

At a very local level, communities have been entry points for affordable housing schemes. Emphasis is always placed on understanding communities' aspirations (rather than making assumptions and directing from the top-down) as a means of building local support. However, where communities accept some housing (and feel that they have 'done their bit), it can be difficult to persuade them to accept more, even where evidence points to a much higher level of need. Communities need time to absorb and integrate development; they need to see its positive benefit before larger projects become acceptable. Both the independent RHE and the Affordable Housing Officers tend to have planning experience, and can therefore quickly assess the development potential of sites where local need has been established. Putting the community at the 'core' of site selection was viewed as vital: co-opting the community to identify sites builds early momentum.

But that only happens once need has been established. Cornwall's Affordable Housing Team, together with the independent and in-house enablers, hold events within parishes to publicize the Council's 'Home Choice' register. It was suggested that households in need sometimes found the registration process confusing, and that road-show events have increased the number of people with a registered need. However, under-registration of need remains an issue across Cornwall. The number putting their names on the register is always higher once homes have actually been built. Prior to that happening, need remains hidden as the expectation that suitable homes will become available is low. It was suggested that such under-registration is more evident in rural than urban areas, because of a lower expectation of new housing being built in villages. A recent initiative has been to issue a regular newsletter, sent to parishes and community groups, and also circulated via social media: the aim is to dispel myths about who gets the new homes, which may also be contributing to a rise in registered need, and to promote successful projects.

At a strategic level, there are several nested partnerships that form the knowledge and support network for RES in Cornwall. The Cornwall Housing Partnership (for RPs) is top-tier, sitting above a Sites Delivery Group and a Landed Estates Group. Cornish policy is that a minimum level of 50% affordable housing is required on RES. Developers (and some RPs) may interpret that minimum as a maximum that they need to deliver, relative to the market component. In order to break through this ceiling, there is a proposal to classify the viability of sites: higher value sites (for example, in St Mawes or Rock) would be set higher affordable housing minimums, say 75%. Such a classification would align with Policy 8 in the Local Plan, which maps five 'house price value zones' (page 43). The idea is that such an approach would keep plot prices on RES closer to £10,000, by limiting the hope of a bigger market component and higher land price on more valuable sites. It would also ensure that more of the homes built on RES are affordable. The desire to maximize social benefit and minimize private profit-taking was a recurrent them in interviews: it was suggested, for example, that post-build assessments of viability could be conducted, once all costs and revenues were known, to ensure that fair value had been obtained from a development by the council – with claw-back agreements in place to curtail 'super profits'.

Besides cross subsidy, funding for RES (and for activities that indirectly support RES) has been secured from the Community Homes Fund (see above), Homes England, and the Cornwall Commission Funded Programme, with the latter bringing together capital receipts, Section 106 contributions from allocated sites, and borrowing from the Public Works Loan Board. The Council has also established its own limited company, Treveth, which builds market homes for sale and rent, and affordable homes within its schemes through an RP subsidiary, Piran Homes.

Whilst much has been achieved, in terms of the number of affordable homes on RES (and allocated sites), challenges remain that can derail projects. Rising construction and borrowing costs were said to threaten some projects, whilst a lack of capacity within some agencies – not only local planning but also Natural England and Western Power – can cause delay in the progression of schemes and add to their cost. The perception amongst landowners that more sites may be allocated for housing in the future (sometimes because this aspiration is articulated in neighbourhood plans) can also slow the rate of RES delivery by increasing the hope that more lucrative development opportunities may arise.

- There is considerable interest, nationally, in Cornwall's apparent success in the delivery of affordable homes on RES. Officers noted that other rural councils, often ones with no track-record of RES delivery, ask them 'how they do it'. They flag the following factors:
- A clear articulation of the challenge: the low average wages of people working in Cornwall versus high house prices, generating a very significant socio-economic stress;
- Strong political support from members manifests as persistence among officers, and in positive development management in respect of RES;
- A spatial development strategy that supports a 'dispersed approach' utilizing a mix of allocated and exception sites.

Project level

First-level interviews identified a site in Veryan, on the Roseland Peninsula, as being typical of the 'Cornish' approach to RES delivery. Interviews at the project-level were conducted with the Senior Project Lead, a parish councillor for the village (and former independent leader of Cornwall Council, still serving as a member), the former RHE for the site and the Allocations Manager for Cornwall Housing. Veryan Parish had a population of just under 950 at the 2011 Census. The site delivered is known as Market Garden.

The site originated in the Cornwall Land Initiative, started in 2009 and since renamed Homes Cornwall. That initiative sought to bring council land forward for development and broker development agreements between the council, a developer, and an RP. In light of the land deal, the developer would provide an agreed percentage of affordable homes (or cash in lieu) which the RP would then manage. It was acknowledged that some sites would be more attractive to developers than others, but the RES mechanism would ensure the successful delivery of a mix of market and affordable homes. The site in Veryan was high value, as demand for homes in this attractive village is significant. Agreements reached under the Cornwall Land Initiative required developers to work with communities and parish councils to ensure the formulation of acceptable proposals. The Veryan site was part of Cornwall Council's Farm Estate: its lease was up for renewal and the tenant wanted to reduce his landholding, which resulted in a site large enough to accommodate 14 homes being freed up.

Veryan's Neighbourhood Plan only allowed for RES sites of up to five homes, and the developer wanted to build 4 and 5-bed 'executive homes' on the site, with minimal affordable provision. The parish council and community wanted a mix of 1 and 2-bed bungalows and a few family homes – all for social rent. No agreement could be reached, leading the developer to withdraw from the initiative in 2016/17. By this point, members of the parish council were determined to deliver what the community wanted. Support for new homes was particularly evident amongst young people, who were the children and grandchildren of many existing residents. At the same time, the Council was establishing its own development company, Treveth, but the aim of that initiative was to build on larger sites, so the Veryan project was left as a potential direct delivery scheme that would be taken forward by Cornwall Council's Housing Revenue Account (HRA) Delivery Unit, which has since delivered more than 300 homes.

Veryan became one of the villages in which the council would deliver against its pledge to build 1,000 affordable homes. The community's aspiration – to deliver 100% social rent that would enable young and old to stay in the village – did not change. Council direct delivery can include a mix of social rent and affordable rent (80% of market rent), but the latter is unaffordable for many households in need. Although, at 14 units, the project exceeded the limit set in the Neighbourhood Plan, the Parish Council and the RHE worked hard to secure community support. Six objections were received from people living very close to the site - referencing extra traffic, parking constraints, and the removal of ancient hedgerows – but support from the Parish Council was unanimous.

The Market Garden scheme cost £3.468 million, more than a third (£1.38 million) of which was covered by Homes England grant funding. Additional sources of funding included council borrowing, HRA reserves, and Section 106 monies from allocated sites. Build costs reflected particular design requirements, including the use of stone and the installation of some round windows, which are a feature of the area. Two aspects of the funding package are of note. Firstly, whilst homes built using HRA reserves are vulnerable to the Right to Buy (RTB), a discount floor applies to this scheme which would allow the Council to recover the full build cost for each home for the first 15 years. After that, the usual RTB discounts will apply. Secondly, Cornwall Council has borrowed £374 million from the Public Works Loan Board since 2006 on different fixed rates. The first loan repayment is due in 2042. The Project Lead commented that this level of borrowing has provided between £20 million and £22 million per year to its development programme. The borrowing is considered sustainable and has supported the Council in its pursuit of ambitious affordable housing targets.

Finally, when the Market Garden development was progressed, the infrastructure, drainage and access were all designed in such a way as to facilitate future expansions of the site. In light of its positive benefits, and strong community support, the Parish Council is now suggesting that new homes are added, although formal plans have not been prepared. The scheme has also caught the attention of neighbouring parishes, which have brought forward proposals for their own 100% social housing developments on potential council-owned RES. Veryan's success has been an inspiration to others.

Key learning

The case illustrates:

- The critical importance of strong political leadership manifesting itself as determined and positive processes and engagements – and in the harnessing of all local authority resources, financial and land, to deliver RES;
- The value of aspirational targets that headline an area's ambition to combat socio-economic exclusions centered on housing market pressures;
- How key delivery partners (councils, RPs, and enablers) must engage in close working with communities, to evidence need, and to build support for affordable housing;

- The critical role of tailored cross-subsidy policies that reflect local market realities in maximizing affordable housing delivery;
- The potential of direct provision by councils, on allocated and exception sites, and of utilizing mixed funding that includes sustainable borrowing and HRA revenues, to support ambitious housing programmes.
- The role played by a spatial development strategy that supports a 'dispersed approach' utilizing a mix of allocated and exception sites.

Case Study 2: Shropshire

Case Study 2: Shropshire – enablers working with RPs to deliver affordable homes for key workers

Planning policy context

Shropshire is a unitary authority. The authority borders the Welsh local authorities of Powys to the west and Wrexham to the north. This 'largely rural' authority has more than 300,000 inhabitants, three-quarters of whom were judged to be living in rural areas, including hub towns, at the 2011 Census. Shropshire Council last completed an update of its Local Plan in March 2011. Government data on the status of strategic plans notes that the Council submitted a new Local Plan in September 2021. That Plan is currently under Examination and passed its Stage 1 Hearing in February 2023, when the Inspector confirmed that the authority had met its Duty to Cooperate with neighbouring councils, principally on identifying housing and employment land. In terms of total delivery of affordable homes on RES between 2017 and 2022, Shropshire is second only to Cornwall (with 264 units delivered), although its delivery per 10,000 population (15 units) drops it to sixth place nationally. In the 24 months to September 2022, the Council turned around 81.4% of its non-major applications within 8 weeks. Shropshire is another successful planning authority, delivering affordable housing on RES and turning around applications during a period in which it has also been focused on delivering against the requirements of a Local Plan Review.

First level – strategy and corporate priority

The creation of Shropshire Council as a unitary authority from the merger of five separate districts in 2009 meant the centralising of some novel policy approaches to rural affordable housing, including the single-plot RES policy for self-build housing – the 'Build Your Own Affordable Home' scheme – that had been pioneered by South Shropshire District Council. Although Shropshire has no national parks, the Shropshire Hills Area of Outstanding Natural Beauty (AONB), which covers much of the south of the authority area, provides a particular set of challenges for rural affordable housing delivery. House prices have been elevated by demand from home-workers through the Covid-19 pandemic whilst Shropshire's smaller settlements restrict potential for new housing delivery. Housing affordability problems in and around the AONB area have been exacerbated by the increasing popularity of short-term holiday lets, which have reduced the availability of long-term private letting to local families and pushed up rents. Interviews were conducted with the two housing officers responsible for rural housing in the southern and northern parts of Shropshire. Affordable housing is a key corporate priority. There are approximately 6,000 households on Shropshire's housing waiting list but the generally small scale of development means that an insufficient number of affordable homes are delivered though Section 106 contributions on allocated sites. RES schemes are therefore potentially important, especially in the south of Shropshire, which has a more dispersed settlement pattern. But whilst the northern part contains towns that have been able to accommodate sites of up to 40 homes, many of the smaller settlements in the south

contain few or no affordable homes, and land seldom comes forward for RES housing. The shortage of such homes has contributed to population aging and a particular challenge Shropshire is a unitary authority. The authority borders the Welsh local authorities of Powys to the west and Wrexham to the north. This 'largely rural' authority has more than 300,000 inhabitants, three-quarters of whom were judged to be living in rural areas, including hub towns, at the 2011 Census. Shropshire Council last completed an update of its Local Plan in March 2011. Government data on the status of strategic plans notes that the Council submitted a new Local Plan in September 2021. That Plan is currently under Examination and passed its Stage 1 Hearing in February 2023, when the Inspector confirmed that the authority had met its Duty to Cooperate with neighbouring councils, principally on identifying housing and employment land. In terms of total delivery of affordable homes on RES between 2017 and 2022, Shropshire is second only to Cornwall (with 264 units delivered), although its delivery per 10,000 population (15 units) drops it to sixth place nationally. In the 24 months to September 2022, the Council turned around 81.4% of its non-major applications within 8 weeks. Shropshire is another successful planning authority, delivering affordable housing on RES and turning around applications during a period in which it has also been focused on delivering against the requirements of a Local Plan Review.

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Shropshire's 'Home Point' housing register and a Strategic Housing Market Assessment (SHMA) have been important in profiling the need for affordable housing. The housing strategy team undertook an area-wide housing needs survey in 2022, which pinpointed the locations of most acute need. High-level surveys tend to be supplemented, where necessary, by targeted housing needs assessments undertaken in partnership with the parish councils under the 'Right Home, Right Place' programme – described as 'a Shropshire Council-led initiative to identify hidden housing needs across the county and ensure local people have access to the right housing in their area'. The programme allows residents to complete an on-line live survey, which details needs at a parish level. However, the assessments it produces, along with other surveys, were described as 'a starting point but not the full picture'. Regular under-reporting of need was attributed to a widespread tendency – particularly from those whose needs were described as 'middling' – to not 'see any possibility that they would ever get a home' and therefore see no point in completing a survey.

Potential development sites may come forward through a variety of means. Knowledge of RES housing is relatively widespread among landowners across the county and it is reasonably commonplace for a landowner, or a landowner's agent, to approach a particular parish council, the local authority, or an RP with a potential site – often in the hope that private housing for family members can be included in a scheme. On other occasions, the local authority will work with parish councils and RPs on the identification of potential sites during village 'walkabouts'. A community-led approach to initiating affordable housing development is becoming more common. In Prees, a village in north Shropshire, the parish council established a local need, initiated its own search for sites, and subsequently engaged an architect to design the scheme and found an RP to undertake the development. This approach resulted in a high degree of community buy-in but also placed significant pressure on the housing team, which needed to advise the community and guide the process. Looking ahead, the council hopes to identify plots suitable for RES during the Strategic Housing Land Availability Assessment's 'call for sites' stage: plots that might be viably developed but which are not allocated within the Local Plan.

Shropshire Council has a strong track record of delivering rural affordable housing through a combination of affordable contributions from small market led sites and rural exception sites. This was significantly disrupted by the 2014 Written Ministerial Statement, subsequently incorporated into the NPPF that prevented local authorities from securing affordable housing contributions from sites of less than 10 dwellings. However, provision was made and then further amended that allows LPAs to require affordable housing on small sites in Designated Rural Areas (DRA). In response Shropshire successfully applied for an extension of DRA coverage across the county and their Submission draft Local Plan includes a policy that will enable them to seek affordable housing on sites of 5 or more dwellings in rural areas.

The extant RES policy, adopted in 2011 permits 'exception schemes for local needs affordable housing on suitable sites in and adjoining Shrewsbury, Market Towns and Other Key Centres, Community Hubs, Community Clusters and recognisable named settlements, subject to suitable scale, design, tenure and prioritisation for local people and arrangements to ensure affordability in perpetuity' (its spatial strategy is to disperse

development as needed). It does not make any provision for cross-subsidy on RES.

The Submission Local Plan marks a departure from this approach. In the specified types of rural settlement affordable housing can be provided under three different types of Exception Site policy. Rural Exception Sites of up to 25 dwellings, solely for affordable housing to meet local housing need, with no provision of cross-subsidy from market housing. Entry Level Exception Sites providing affordable housing for first time buyers or those looking to rent their
Cross-subsidy Exception Sites where up to 30% of the dwellings can be market housing where this facilitates the development, there is no grant available and an Affordable Exception Site is unviable.

Shropshire's well-known single-plot RES policy was developed by South Shropshire District Council prior to the formation of the unitary authority in 2009. The policy sought to support a scale of development that was deemed consistent with the county's dispersed rural settlement geography, and with the then-emergent 'localism' agenda in planning. It extended support to the 'Build Your Own Affordable Home' (self-build) scheme on exceptions plots, which has facilitated more than 20 new affordable homes each year in Shropshire. However, the dispersal of new homes encouraged by the single-plot approach is now regarded as incompatible with the more recent emphasis on sustainable development, prompting adjustments to the single-plot policy that reduces car dependence and steers affordable homes to more sustainable locations.

Shropshire Council has long-established and close relationships with a number of local registered providers, notably Shropshire Rural HA and South Shropshire HA. Which of the local RPs is engaged to take forward a project will depend on location and the scale of a development opportunity. The Council does not have preferred partners and there are no independent rural housing enablers operating in Shropshire. The lack of RHEs results in a capacity challenge and makes it difficult to forge strong links with communities and local landowners. The more generic local authority based enablers, of which there are two for the entire council, work more generally on affordable housing delivery and are not dedicated to RES. This capacity issue is perhaps amplified by the lack of active CLT. There is just one, based in the market town of Bishops Castle, so CLT partnership working is not a key part of rural housing delivery at the present time – and the appetite for more CLTs was judged to be low across the county.

However, awareness of 'what works' has been increased through the forging of an important relationship with the housing teams in the neighbouring districts of Wychavon and Malvern Hills. There are regular discussions and knowledge-sharing meetings focused on affordable housing delivery in the Malvern Hills and Shropshire Hills AONBs.

Although smaller RES schemes may face significant viability challenges, linked to escalating procurement and build costs (which were said to have doubled in real terms over the last decade), community opposition is by far the bigger obstacle to affordable housing projects. This is especially true in the smaller communities of south Shropshire where there is a fear that any development will bring unwanted community change. Opposition to development occurs even where there is significant population aging, where there is heightened need for elderly care, and where housing affordability is a critical

barrier to the recruitment of care and health workers. Whilst that opposition seldom stops development, it generates additional costs for Shropshire Council and for RPs, which must invest more time engaging, supporting, and encouraging communities. The Council's two enabling officers are frequently over-stretched, increasing the risk of project failure. First-level interviews presented early engagement as a foundation for successful RES schemes: engagement that establishes an accurate picture of housing need; that seeks to understand what landowners want from development, including the required level of incentive; and that builds support for a project that is right for a community. The required intensity of engagement creates a huge workload for the council's enabling officers, particularly when communities are resistant to development – either because residents believe that there is no need for affordable homes or because such homes will be let to newcomers.

First-level interviews with the housing officers pointed to the case of Doddington village in the parish of Hopton Wafers. The Doddington case is in many ways typical of RES schemes in Shropshire. The authority's enabling officer has expended considerable effort in trying to bring forward a RES development opportunity presented to the Council by a landowner, close to an important assisted living facility – Doddington Lodge Care Home. A planning application for RES housing on the site is currently awaiting determination, following the refusal of a previous application on ecology grounds.

The scenario is a familiar one: the parish has an established need for affordable homes, including for existing and prospective staff at Doddington Lodge, but the community is fiercely opposed to such development. Population aging in the area is placing substantial demand on care services. The 2011 Census revealed that a third (32.8%) of residents in the parish were retired – a third more than the Shropshire average (21.7%) and double the national level (16.3%). 5.6% of residents were over the age of 80 – almost three times the national level of 2.2%. Early results from the 2021 Census suggest that Hopton Wafers' population has continued to age. Doddington Lodge is the only assisted living facility in an area of 250 square km stretching from Ludlow to Stourport. It is a critical infrastructure for the area's aging population, but conversations between the RP and the care home manager have revealed significant problems in recruiting and retaining staff, largely because of a lack of nearby affordable homes.

The Doddington case pinpoints some of the challenges of bringing forward a RES in an area of high landscape value and where a project is ostensibly landowner-led. Insights into this case were gained through one of the first level interviews, planning portal documents, and an interview with the Shropshire Rural HA's Chief Executive.

Evidence gathered for a Local Plan review showed a substantial need for affordable homes across Shropshire in 2011. This prompted further efforts to understand the geography of need, culminating in the 'Right Home, Right Place' initiative. However, because there were no existing affordable homes in Hopton Wafers, few people registered a need in this Parish (although the lack of registered need is at odds with the experience of Doddington

Lodge Care Home). In the meantime, the Parish Council developed a 'community-led' Parish Plan in 2012 and, before reviewing that plan in 2021, conducted a household survey on a range of issues including local housing and planning. The survey showed that residents of Doddington village were particularly resistant to new development: 60% were against any and all development, and 30% supported the principle of limited development only.

The RES site, for which there is a live application, is adjacent to the Doddington Lodge Care Home. It is understood to have been acquired by a family that hoped to build homes for their three children on this unallocated site. The owner contacted the Council's housing team and was advised that the site might work as an exception. This initial contact was followed by an introduction to Shropshire Rural HA and the formulation of a proposal for 8 affordable homes and 10 self-build plots for open market sale. This proposal satisfied the owner's financial interest (and presumably the interest in providing homes for their children) and offered a means of cross-subsidizing the affordable component.

The anticipated barrier presented by community resistance has been compounded by a turnover in planning staff. In the space of 6 years, the case officer for the proposal changed four times. Each new officer gave different advice on the scheme, although that advice often reflected shifts in the changing national planning framework and in local policies. Opposition to development has however been the defining feature of this project.

Opposition to development on this particular RES is partly explained by the defence of landscape amenity in the Shropshire Hills AONB (many residents have retired to the area, often from the West Midlands conurbation) and also by a difficult relationship between some residents and the landowner. Residents have jumped on errors in the application, including an incorrectly drawn-up land transfer agreement (required to provide access to the site via land owned by the village hall) and an expired ecology survey. Where there is stiff opposition, development partners need to give careful attention to the detail of a planning application. One might conclude that the decision of the RP and landowner to take forward a project without community buy-in was a fundamental error. On the one hand, it appears unlikely that buy-in could have been achieved given residents' expressed opposition to development. But on the other hand, a problematic relationship between residents and the landowner may well have been accentuated by the significant component of market development in the proposal (the interests of the landowner have trumped the conservatism of the community?)

Ahead of the submission of a further planning application, a new ecology survey has now been commissioned and new access arrangements have been agreed that will not require a land transfer. Despite problems with the Doddington scheme, Shropshire Council and the RP remain committed to it. They view it as a necessary response to population aging, which brings new service needs that can only he met by younger residents, who require affordable housing. The RP has taken on substantial risk, meeting planning costs and agreeing to pay £120,000 for land on which to build the 8 affordable homes (the remainder of the site, for the 10 self-build plots, will be retained by the family). However, an element of the planning costs will be subtracted from the price agreed for the land. Overall, this unfinished project at Doddington highlights the challenge of providing affordable homes in a protected landscape with an aging, and often retired, population that may not accept the need for such housing.

- The case illustrates:
- How online portals for monitoring and mapping housing need, i.e. Shropshire's Right Home, Right Place initiative, contribute to building the evidence base needed to support RES development;
- The challenge that community opposition poses to development, especially that expressed by aging/retired populations in protected areas, which can make it extremely difficult to secure community buy-in;
- How, in the absence of that buy-in, development partners (local councils, RPs, and landowners) need to devise strong proposals that are well-evidenced, but also address community concerns around the scale and form of development;
- How, in areas of dispersed population, smaller settlements, and hence small market schemes, the exempting of developments (of 10 units or fewer) from contributing to affordable housing Section 106 agreements has potentially made it more difficult to fund smaller RES schemes (which then have to grow to achieve viability). This national policy, enacted in 2016, should be reversed in protected rural areas; and
- How the Doddington scheme's difficulties may relate to this policy change: a smaller scheme, representing 'limited development' may have attracted greater community support.

Case Study 3: Derbyshire Dales

Planning policy context

Derbyshire Dales is a district in the East Midlands. It lies to the South East of High Peak District and borders both the West Midlands (specifically Staffordshire) and the North East (the city of Sheffield). There are significant urban pressures on its housing stock. A large part of the district, to the west of Matlock and north of Ashbourne, is covered by the Peak District National Park. Derbyshire Dales, Bolsover, North East Derbyshire and Chesterfield districts form part of the South Yorkshire Mayoral Combined Authority.

Derbyshire Dales is a mainly rural district that had a population of 70,000 in 2011, residing entirely in rural areas including hub towns. Two plans are extant in the district: a Local Plan that was adopted in December 2017 and a Peak District National Park LDF Core Strategy that was adopted in October 2011 (updating and supplementing a 2001 Local Plan). The latter was superseded in May 2019 by new Development Management Policies, which now form an updated part of the 2001 plan.

Derbyshire Dales' Local Plan gives support to RES in Policy S9 ('Rural Parishes Development Strategy') and details how RES should be progressed in Policy HC5 ('Meeting Local Affordable Housing Need (Exception Sites)'. There is a strong preference for RES that comprise 100% affordable homes, although HC5 states that 'in exceptional circumstances, planning permission will be granted for mixed affordable and open market housing as part of an exception site where it can be demonstrated that the provision of open market housing is required to facilitate the delivery of the local needs affordable housing'. The proportion of open market homes cannot exceed 50% of the dwelling total.

The National Park's Development Management Policies document set out its unique and restrictive approach to housing provision. Extensive general policies on housing do not detail the circumstances in which RES are appropriate, but there is a significant focus on housing need and the characteristics of those in need, whether essential workers or existing/returning residents with a 'local connection'. There is no housing target or site allocations, in effect making all sites exception sites. Market housing is allowed through conversions and where re-development of a site would bring environmental enhancement, but not to cross-subsidize affordable housing delivery. Affordable housing is allowed where it meets a proven local housing need, but is limited by the overriding National Park Purpose of conserving and enhancing the landscape. There is a specific mention of self-build and custom build homes being permissible on exception sites, if need is proven.

Despite the split responsibility for planning, the total output of affordable homes on RES is reported by Derbyshire Dales District Council (specifically, by the Housing Authority). Ninety-three (93) homes were provided between 2017 and 2022: or 16.6 for each 10,000 population. Decisions were reached on nearly 88% of all non-major applications in the 24 months to September 2022, although a figure on planning performance for the National

Park Authority is not available. Derbyshire Dales District Council is a strongly performing authority, which began a review of its Local Plan in November 2022 – driven largely by the need to look again at growth scenarios up to 2040. But because the Council is the planning authority only for that area that sits outside the National Park, our general focus looks across the Park and District authorities.

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First level – strategy and corporate priority

Derbyshire Dales is a nested case study, predominantly concerned with the support given by a housing authority to a National Park. First round interviews were undertaken with housing and planning leads within the Derbyshire Dales District Council (DDDC) and with the planning policy lead within the Peak District National Park Authority (PDNPA). DDDC's Housing Director (who was the council's housing manager until 2017) has been with the authority for more than 20 years, joining the authority shortly after it transferred its own housing stock to Platform Housing Group. The Planning Policy Manager has been with the council for 22 years. Before it became a 'transfer authority', its corporate focus had been on housing management and repairs, although it had been involved in supporting delivery on RES during the 1990s (back to 1994 in the National Park), working with High Peak Council to set up Peak District Rural Housing Association (PDRHA) back in 1990. After the stock transfer, and because of the need determined with partners, DDDC's corporate priority switched to the delivery of new affordable rural housing. That priority was confirmed following council elections in 2003.

The longstanding corporate focus on affordable rural housing was said to be a source of 'officer confidence and capacity', despite numerous contextual challenges (key amongst which has been a reduction in the number of RPs, from 17 to 3, operating in the Derbyshire Dales over the last 20 years – those remaining are PDRHA, Nottingham Community HA, and Platform Housing Group). Recent council elections in 2023 have not altered the council's focus, with a number of members making housing delivery their critical mission. Member support gives officers the confidence to invest 3 or 4 years (or much more) in supporting a RES, knowing that their efforts will not be fruitless. Confidence spreads through key departments, from estates, through finance, and legal.

Confidence is crucial when RES schemes take so long to progress. Time is spent, firstly, in gathering evidence. Some years ago, the authority and its partners would rely on broader housing surveys to evidence need (strategic level work was undertaken by John Herrington Associates and, later on, by GL Hearn). There has now been a shift to mixed methods – especially the analysis of secondary data from housing registers, the Census, and 'Hometrack' to gain a sense of market change and affordability – alongside targeted

support for parish needs surveys. Despite the availability of better general data (some supporting sophisticated spatial analysis), parish surveys remain essential. They tie need explicitly to the type and number of homes that are proposed on a RES, and therefore seed broader support for a project: the quality of evidence has an impact on delivery, producing a good rapport with parish councils. Surveys are supported and 'pushed hard' by the housing authority – they give shape to the conversation on what housing a community needs and how it might be delivered. Time then needs to be spent on identifying developable sites. The 'walkabout' is a well-known approach to site search. One important expression of the priority placed on affordable housing at DDDC has been the longstanding appointment of an in-house rural housing enabler, now part-funded by the National Park Authority (although DDDC is the principal funder of this post). It was agreed that these are vital, bringing capacity and acting as the glue for projects. They chase planners, work closely with parish councils, and they have the skills needed to engage multiple partners and deliver the '3 minute presentations' to the planning committee in which schemes must be sold to nervous, and sometimes resistant, communities and their political representatives. There is 'no RES without the enabler' – the independent brokers with the human skills to drive forward projects. As in other areas, DEFRA funding for RHEs was once channeled through the Rural Community Councils (RCCs), but then dried up. For a period, they were then co-funded with RPs (when there were more of them). They were then brought in-house, sitting in the housing authority, which seems not to have undermined their claims of independence, and has given them an inside track on planning, aiding their effectiveness.

The RHE will organise a walkabout in a village where the need for affordable homes is clear, with an RP development officer (usually from Peak District Rural HA) and parish council members. Initial long lists of sites are quickly whittled down to the few that are likely to be supported in principle by planning. Exploratory conversations with landowners will give the RP the confidence needed to seek a pre-app service view from Development Management planners, either in the National Park or DDDC.

The majority of RES in this 'nested' case are progressed in the National Park where there are no allocated sites for development (only 'indicative figures' for housing, and a view that all housing should be exceptional and affordable). Therefore the relationship between the Housing Authority and the National Park Authority is critical. DDDC contributes significant capital grant funding to avoid having market housing on RES, often Section 106 receipts from allocated sites outside the National Park. This was said to be the major source of cash for RES, with DDDC often spending those receipts to support projects in the National Park. It was once believed that the receipts of one 'plan area' could not be transferred to another, but this proved not to be the case. Another source of local funding is from capital receipts. Tenants of former council homes transferred to Platform Housing Group retain a 'protected right to buy'. When they exercise that right, the money raised provides DDDC with a 'capital receipt' rather than a 'right to buy receipt', giving the authority greater flexibility in how it is spent.

The overarching message was that the authority's willingness to support RES, including RES undertaken in the National Park, is an expression of the priority given to rural affordable housing: the authority not only 'talks the talk', but also 'walks the walk'.

Despite DDDC's policy of allowing cross-subsidy on RES the practice is to avoid it wherever possible. This aligns with the National Park's policy. Adding market homes to a RES, and therefore increasing the scale and footprint of development, is incongruous with the purpose of the National Park.

There is of course an acknowledgement that design and the acceptable scale of development in the Park will impact on viability, and hence financial support from DDDC is welcome and essential. But, for its part, DDDC recognises that a lot of new housing in the Derbyshire Dales, especially in the Park but also outside it, will need to utilise local materials and accord with vernacular style ('in our own area brick is usually ok though some sites need stone, whereas in the Park, stone is the only material we can use. Sometimes render is allowed, but only on elevations that are out of site'). It is the combination of the small-scale of these developments and the high design requirements of the national Park that affect viability and which, in the absence of any cross subsidy from market housing, require high levels of grant from Homes England and added grant contributions from Derbyshire Dales District Council.

Land cost also needs to be low, with hope value suppressed – by the clarity of a local plan in which all housing release is exceptional and none is allocated. Operating in the National Park gives that clarity, enabling partners – i.e. the RP – to hold the line on land price. It was acknowledged that not all areas are the same or have the same landscape attributes. In protected landscapes, it is easier to 'hold the line' on land price, bringing it a little closer to £10,000 per plot.

The 93 affordable homes built on RES between 2017 and 2022 across the Derbyshire Dales have been delivered on half a dozen sites. They range in scale and type – from a much larger scheme in Bakewell comprising 34 units, a CLT-led scheme in Youlgrave of 8 homes (across two phases), and four affordable homes in Taddington. The last of these projects is typical of the scale of 100% affordable RES development in the Peak District and therefore provides the project-level focus.

Project level

First round interviews revealed that RES developments in the National Park are small (typically fewer than six units) and there is no use of cross-subsidy. They abide by strict design standards, adding to overall development cost. Larger schemes have been progressed more recently, but these are atypical. Hence, the selected project case study was a scheme of four affordable homes for rent in the village of Taddington. These were completed in 2020.

Interviews were undertaken with a member of Taddington Parish Council and a Board Member of PDRHA. These interviewees had secondary roles, as a Board Member of the National Park Authority in the case of the Parish Council Member, and a planning policy officer at the time of the project in the case of the PDRHA Board Member. Further insights into the Taddington scheme were gained during policy-level interviews. The then RHE had

moved to a new role and was uncontactable, and the RP lead (see below) had retired.

Taddington is an old lead mining village with a resident population of just over 450 at the 2011 Census (a figure which included neighbouring Blackwell in the Peak and Brushfield parishes). The story of the Gregory Croft development began in the mid-2000s, when those living in the village saw that 'there were local families in Taddington not living in the best situations'. A housing needs survey was undertaken by DDDC, led by the RHE, later in the 2000s and provided evidence of 15 local households in need. The survey was repeated in 2012 (8 years before eventual project completion) and confirmed this approximate level of need – 12 households on that occasion, requiring homes with 2 or 3 bedrooms for rent. The need figure suggested by a survey is 'divided by 3' to arrive at a required unit figure: hence the second survey supported the size of the scheme eventually progressed, i.e. four units. At the time of the two surveys, acceptance that there was a need for affordable housing in the village was almost universal, but it was known that an actual planning application would likely provoke a different response – contestation always focuses on sites and never on the principle that local people should have access to affordable homes. Hence objectors always 'understand the need' but the site is 'always wrong'.

The parish council has a key role in helping partners navigate this contradiction. Two years after the second survey, and following discussions between the housing enabler (based at DDDC), PDRHA, and the Parish Council, a meeting was hosted in Taddington to discuss the prospect of developing homes on a RES. A site walkabout had been conducted after the first survey, in either 2009 or 2010, but nothing was taken forward at that time. The new meeting however, in 2014, gave much greater momentum to the project, possibly because the two surveys – 5 years apart – had now demonstrated a consistent need for affordable homes in the village. From that point, the Parish Council became responsible for making the community aware of what might happen: the National Park Authority was strongly of the view that, as the representative body for the community, the Parish Council should be 'on board and supportive of any local development', although the housing enabler and the RP were thought to have critical roles to play in 'building understanding amongst the community beyond the Parish Council itself'. The contradiction between in-principle support for housing and site nervousness means that the Parish Council must be circumspect, not pushing too hard for any particular site, but appearing open to all options.

The first challenge after the survey and initial meeting was the new walkabout. There were a number of 'derelict sites' in Taddington, mainly old farmyards. The Housing Manager suggested that a long-list of 22 sites in the village was eventually whittled down to a couple. This may have happened across the two walkabouts as the Parish Council interviewee thought that just five sites had potential, which included the eventually selected site, referred to as 'town end'. This was not the Parish Council's preferred site. It was in a triangle between three lanes and was wooded and over-grown. There was a view that it had the potential to become a community open space. Members of the Parish Council preferred a nearby site, but the NPA judged that site to be potentially problematic and favoured the 'town end' site for planning reasons. Interviews suggested that, ultimately, the choice of site was not a dealbreaker. There was momentum behind

affordable housing by this stage, which was not going to be derailed by relatively minor differences of opinion on the relative merits of the last two sites.

Leadership of the Taddington project was split between the RHE and the development lead at PDRHA. The Parish Council interviewee put the RP lead on an equal footing with the enabler, describing the former as having a pervasive influence on RES projects across the Peak District for a number of years. The PDRHA interviewee agreed, describing that person as a 'huge figure in the affordable housing space in the Park and beyond'. They agreed that the project benefited from the collective energy of the enabler, the RP lead, and the Housing Manager at DDDC. The latter was seen as one of the primary funders of the Taddington project. Indeed, there was the sense that funding had come personally from that officer – he was said to have been a 'major supporter of all projects and, because of [him], the Derbyshire Dales part of the National Park has more RES than other parts'. However, it was noted that some disagreement had arisen within DDDC between those officers (in planning) who pushed for the use of cross subsidy, arguing that local authority funding (from Section 106 and capital receipts from protected right to buy sales) is unsustainable and finite, and those (in housing), who argue that where the RP-LA partnership 'holds the line' (on 100% affordable and no cross-subsidy), price expectations can be suppressed and land prices will continue to support project viability. There is considerable alignment between the views of the housing authority, the National Park Authority, and PDRHA on this issue.

Indeed, the PDRHA Board Member noted that there was 'no inflation above agricultural value' and no incentive to the landowner for bringing land forward in Taddington beyond an appeal to civic duty (this is your opportunity to help the community) and the offer of engagement with a 'reputable RP on the development of their land'. Land was, of course, not sold at agricultural value, but for £10,000 per plot. It was noted that RP Boards are always nervous about inflation by hope value. Hence the NPA has a 'hold the line' approach to no plan-led allocations and only exceptions. The scheme, and the dealings with the landowner at Taddington were said to be typical of this approach, which applies also to cross subsidy. The NPA logic is that permitting market housing as a means of unlocking affordable housing would simply accelerate the loss of acceptable sites to a form of housing for which there is no demonstrated need: 'when acceptable building land is hard to come by, why build what you don't need?'

Following the survey of local needs, the site walkabout, and the agreement with the landowner, a planning application was submitted to Peak District National Park Authority on 16th December 2016. The critical features of the Taddington case are, locally, the circumspection of the Parish Council – leading but not pushing too hard ('bear in mind that even small schemes of four homes can feel significant for a tiny village like Taddington') and the collective energy expended on the project by the triad of the housing enabler, RP lead, and the Housing Manager in DDDC. The corporate features are the push for affordable housing within Derbyshire Dales, reflected in funding arrangements; and the shared antipathy towards putting market housing on rural exception sites in a protected area. The act of 'holding the line' in respect of cross-subsidy and land price is a defining feature of the Taddington project.

Key learning

The case study Illustrates:

- That where the delivery of rural affordable housing is given strong political support, officers have the confidence to invest time and energy in progressing challenging projects;
- How political support may beget local financial support, driving resources into schemes to ensure their viability;
- That parish councils must navigate the contradiction between in-principle support for affordable housing and nervousness around specific sites. They need to work with partners, but avoid jumping at a particular site too quickly;
- How 'holding the line' on 100% affordable housing, the suppression of hope value, and land price, potentially works in protected areas where that line is supported by key policy partners;
- How small projects can, in some circumstances, be made viable through a clear planning approach in instances where all affordable rural housing is exceptional, and none is on allocated sites.

Case Study 4: Winchester

Case Study 4: Winchester – invest in long-term partnerships to de-risk projects

Planning policy context

Winchester is a 'largely rural' district council in the South East of England (just under 60% of its population reside in rural parts of the district). The authority covers Winchester itself and a significant part of the surrounding Hampshire countryside. The City Council was formed in 1974, combining the old City of Winchester with Droxford and Winchester Rural Districts.

The extant plan has a joint core strategy with the South Downs National Park, part of which lies in the City of Winchester authority. The joint core strategy was adopted by the National Park on the 19 March 2013, and by the City of Winchester on the following day. A second part of the plan – a Development Management and Site Allocations document (LPP2) – was adopted by the City in April 2017, and this applies only to that part of Winchester that does not lie in the National Park (the Park covers a significant central part of the district, to the east of Winchester itself, although the district extends west, north, and south of the Park).

Winchester began a review of its existing plan in 2018 and has published an emergent Local Plan. It is anticipated that the new Local Plan will be adopted in 2024. SDNPA adopted its own Local Plan back in 2019.

The City Council's Core Strategy was adopted in 2013. Policy CP4 ('Affordable Housing on Exception Sites to Meet Local Needs') set out general rules on RES (location, size, tenure, design, character, and perpetuity requirements) and states that affordable homes must be for rent (with 'with rent levels being determined by reference to local incomes of those in priority housing need'). With regards to cross subsidy (introduced in the 2012 version of NPPF), the Core Policy is that 'in exceptional circumstances a modest element of other tenures may be allowed on the most suitable identified sites in order to enable a development to proceed, providing no less than 70% of the homes proposed meet priority local affordable housing needs'. CP4 became a 'saved policy', now transferred to SD29 of the new Local Plan ('Rural Exception Sites').

There can be no cross subsidy element on RES within the National Park. This is clarified in a note on 'mix of tenures':

The National Park Authority believes that a policy of allowing market housing would reduce the number of affordable homes coming forward and may reduce the willingness of communities to support the principle of rural exception sites. The emphasis on rural exception sites in national parks should be on 100 per cent affordable housing. If a viability appraisal has robustly demonstrated that viability genuinely risks preventing a rural exception site from coming forward, and there are no alternative, more viable, sites, the Authority will work with the landowner, community and other stakeholders to establish the optimum alternative option which best meets the local need.

The NPA details what it sees as essential features of RES: locations that have a positive impact on ecosystem services; demonstration of effective community engagement; fulfilment of the aspirations of communities in terms of meeting local need; and effective partnerships that include Rural Housing Enablers. Although the 2013 Winchester District Plan makes no mention of RHEs, an enabling strategy had been in place from 2005. Winchester City Council reported that 68 affordable homes were delivered on RES between 2017 and 2022: a rate of 10.2 per 10,000 population (tenth in the list of top-10 performing local authorities, by population). This figure includes a small number of affordable homes facilitated by the National Park Authority. Planning performance – the turnaround of non-major applications – was in the first decile, with 92.2% of applications determined within 8 weeks in the 24 months to September 2022. The City Council looks to have worked closely with the National Park on the formulation of planning policy, but differ in their approaches to RES, with cross-subsidy viewed as generally inappropriate within the Park.

First level – strategy and corporate priority

Although roughly 40% of the Winchester City Council area (and nearly 17% of its population) falls within the South Downs National Park area, none of the seven RES schemes delivered since 2015 are located within a parish that falls entirely within the National Park: and only one site (at Twyford, to the south of Winchester) is located in a parish that is partially within the Park. In contrast to the Derbyshire Dales case (Case Study 3), there has been more limited interaction between the NPA and the local authority around RES.

First-level interviews were conducted with the Housing and Built Environment leads and a long-serving housing officer from the City Council. All three interviewees had extensive experience of RES delivery.

Affordable housing has long been regarded as a corporate priority for WCC, a local authority with an established track-record of promoting public and affordable housing schemes. The city council's largely rural geography makes rural affordable housing a clear priority, although officers emphasised that the council wishes to build 'the right housing in the right places', irrespective of whether those places are urban or rural. The council therefore employs a (generic) Housing Enabling Officer whose focus is the broader provision of affordable housing and who has previously worked closely with the RHE network operated by Community Action Hampshire (see below).

Winchester City Council has established itself as an RP and is pursuing its own programme of council-led housing development. Although the broader corporate focus on affordable housing has remained strong (despite political changes in the control of the Council), there was a reported weakening of the focus on rural affordable housing at the county level. The Hampshire Alliance for Rural Housing (HARAH) was established in 2005. In April 2020, HARAH was wound down and merged with the Hampshire Community Housing Partnership to become the Hampshire Housing Hub (operated by Community Action

Hampshire). This is a 'a partnership to increase the supply of rural and community led housing, primarily as affordable homes, to meet local needs in Hampshire.'

The reported 'weakening' may be due to the combining of community and RP led provision, and certainly relates to a reduction in funding to independent RHEs. It was noted that the City Council's RES activity is now less proactive, and is rather a reaction to the initiatives of parish councils (identifying need) and the desire of community groups to drive forward projects. Evidencing the need for rural housing is a perennial challenge, with 'standard' measures – including parish housing needs surveys – tending to under-report the true level of need, including from 'sofa surfers' or 'concealed households' (residing with family because of the lack of available housing within their price range). As in other areas, such households will only register their need, to the local authority or in response to a survey, if they perceive a realistic chance of being housed – this means, for example, that needs are expressed only when those concealed households see homes being built, or hear about plans to build homes. Although WCC's housing team has worked closely with parish councils, and with the RHE network (operated by Community Action Hampshire) on the assessment of need, the quality of available data remains a significant challenge.

Potential RES come forward in a variety of ways. Parish councils often draw attention to sites once a needs survey has been completed and informal discussions have been held with local landowners. During the period of the HARAH programme (2005 to 2020), the RHEs worked proactively with communities on the identification of suitable sites. Short-lists were presented to council officers (and also National Park officers where applicable) and walkabouts were arranged in which initial assessments of probable planning compliance and landscape impacts could be undertaken. Where few sites were coming forward through this community-led approach, the WCC tended to initiate area-wide searches that ran alongside the Strategic Housing and Economic Land Availability Assessment (SHELAA) component of local plan reviews. But this more 'strategic' approach never sought to impose development; rather, it directed WCC to engage with particular parishes, to initiate the detailed dialogue that might result in parish councils supporting RES schemes.

Participants ascribed the success of RES projects in the WCC area to their 'more substantial scale', to the agreements reached with landowners on sale prices that support affordability, and to the grant funding secured from Homes England. These factors were said to have negated the need for cross subsidy in some instances. However, it was also reported that land price expectations have increased in recent years, with some landowners choosing to retain land in its current use (including as paddocks) and deriving what they viewed as an acceptable rental income (alongside a speculative hope that land might be worth more in the future as a greater range of uses might one day be permissible). The prices being offered by RPs, calibrated to delivering affordable homes, were not sufficient incentive to sell. In this changed context, cross-subsidy has been viewed as a means of unlocking sites. It has increased the variety of land deals being struck in the WCC area, including transfers to RPs at zero cost in return for permission from the local authority to build market homes. WCC is therefore receptive to cross-subsidy arrangements, especially where it plays a decisive role in making smaller sites

viable. On the other hand, the council is keen to secure affordable homes without cross-subsidy where possible: market homes on RES are a means of achieving viability where such viability cannot be achieved through other means.

Although WCC delivers some housing directly, it works closely with key RP partners – notably Hastoe and Hyde Housing – on the delivery of rural affordable housing. It also has a track-record of close working with Community Action Hampshire (which was previously the Hampshire Rural Community Council), especially its RHE network in which WCC's generic (in-house) enabling officer participated. As noted above, the RHE network was proactive in evidencing need and identifying sites. But the end of the HARAH programme, and the new arrangement with the community housing partnership, has meant some 'dropping off' of rural enabling activity. A reduction in funding, combined with a shift to CLT support, has resulted in a noticeable refocusing on enabling in particular places, where community-led housing is taking off. There is some concern that a lack of rural enabling capacity (provided by Community Action Hampshire) will deprive prospective RES of the energy and coordination they need to progress.

Other standard problems affecting RES, including opposition to housing amongst some local populations, have not been significant in the WCC areas, possibly because of the emphasis placed on community leadership through parish councils. However, there are sensitivities around the loss of council-owned homes through the right to buy which tend to colour residents' views of RES, reflected in concerns that even homes built on exception sites may not remain affordable in perpetuity (because a future government might alter the game rules) or that they will not solely benefit 'local' people. The involvement of CLTs can go some way towards assuaging these concerns. Another important challenge in Hampshire, affecting all development, has been the achievement of nutrient neutrality and the fear that new housing poses an environmental risk. WCC has been working with the Partnership for Urban South Hampshire (PUSH) on mitigation measures and ensuring that the infrastructure is in place to deal with additional homes.

All conversations, however, came back to the vital importance of collaborative working and enabling. HARAH was viewed as the programme that had spearheaded RES delivery, with its two full-time RHEs covering Hampshire, as well as a manager who dedicated half of their time to rural housing projects. The HARAH enablers interfaced effectively with WCC's enabling officer. Following the cessation / evolution of the HARAH programme, only the generic WCC enabling officer remains, reducing total capacity from 3 to 0.5 FTE. It is now much more difficult to build the community-level relationships that are key to the success of RES. Some of the energy that RHE bring can be substituted by the enthusiasm of CLT, but these lack the skill-set of enablers, and at the present time there is only one CLT operating in the south if the WCC area.

Project level

First-level interviews drew attention to a RES at Hook Pit Farm Lane at Kings Worthy, to the north of Winchester. The site was thought to illustrate a shift to larger sites and local

authority delivery with a private partner. Housing had first been proposed on the site in the 1970s but it was not until 2005 that outline permission was granted for a RES development of 25 affordable homes on part of the site. The land was then sold to a local developer, Drew Smith, who developed the site in two phases, firstly for 25 homes of mixed affordable tenure, in partnership with Hyde Housing Association, and then for a second phase of 35 affordable rented homes in partnership with WCC. Interviews were undertaken with a housing officer at WCC and with the developer.

During the period of the HARAH programme, Drew Smith and Hyde Housing partnered on a number of RES schemes. The majority of those were small sites, with Drew Smith typically acting as building contractor and technical consultant to Hyde Housing. The Hook Pit Farm Lane scheme was atypical in several respects. Its origins did not lie in the HARAH programme (and its evidence gathering and enabling activities) but in the development opportunity marketed by the landowner, following receipt of outline permission. The site comprised two parts: that part with exceptional permission for 25 homes (which Drew Smith and Hyde Housing were now seeking to develop) and an adjacent part that Drew Smith hoped would be allocated for mixed-tenure housing through the Local Plan process. Failure to secure that allocation led Drew Smith to promote this part of the site for additional affordable housing (in partnership with WCC), the need for which had been established in the evidence base for the new Local Plan. WCC's housing enabling officer was supportive and its 'New Council Homes' team assumed responsibility for community engagement and liaison with the Parish Council. The substantial amount of time subsequently invested in this process by WCC was judged worthwhile given the 'housing rewards' that it would bring.

Land price was fixed at £25,000 per plot. Although higher than HARAH schemes, a fixed price gave Hyde Housing the certainty of an overall package cost for phase 1. The second phase saw Drew Smith partnered with WCC, for whom homes were developed on a 'turnkey' basis. Drew Smith and Hyde Housing drew on experience gained through joint-working under the HARAH programme to obtain planning consent for Phase 1. Phase 2, however, presented a tougher challenge as residents appeared generally united in the view that the first phase had addressed need and a second phase was not required (a view that did not align with evidence and that was not shared by the Parish Council). As boundary paths around the site were used recreationally by local residents, a local campaign was launched to block the development through the site's registration as a Village Green.

Drew Smith and WCC responded positively to this challenge. It prompted them to look again at the design and detail of Phase 2, and to improve rights of way as an additional community benefit. The Village Green application failed, with opposition then fracturing between the more 'hardline' residents and those willing to look again at planned benefits. The Parish Council and developer redoubled their efforts to assuage residents' concerns and, to this end, received considerable support from the New Council Homes team. The pattern and volume of opposition had also shifted when the failure to have the Phase 2 site allocated in the local plan led to a focus on providing affordable homes, suggesting that whilst the community had some concerns over the scale of development, it broadly

supported new homes that met local need.

The Hook Pit Farm Lane RES was developer-led in both origins and eventual delivery process. Both Hyde Housing (Phase 1) and WCC (Phase 2) were brought into a process that was initiated by Drew Smith. For the developer, these linked RES projects were very much commercial propositions, but satisfied mixed commercial and social goals. Although they were outside of the HARAH programme, approaches developed through that programme were used to structure development agreements and enable the partners to more smoothly navigate both planning and community engagement processes. The projects were de-risked by early agreement around land and build costs; and 'intensive' engagement with community concerns (even after the most heated period of community opposition had ended) resulted in a 'big win' in terms of affordable homes delivered.

Key learning

The case study shows:

- The importance of a clear corporate focus on rural affordable housing, extending to direct local authority delivery (with development partners);
- The value of effective joint working between generic enabling officer(s) and independent RHE (in this case, under the auspices of the HARAH programme);
- The potential importance of a strategic search for sites (tracking the SHLAA or SHELAA process) that directs a local authority to conversations with particular Parish Councils and development partners;
- How a pragmatic approach to cross-subsidy is one of a number of means of bringing sites to viability;
- The value of investing in long-term relationships that contribute to de-risking projects and smoothing planning processes;
- The importance of having a trusted private development partner that can play an important role in RP or local authority projects.

Case Study 5: North Norfolk

Case Study 5: North Norfolk – supporting delivery across linked RES schemes with a trusted RP partner

Planning policy context

North Norfolk is a 'mainly rural' district on the north coast of East Anglia, in the East of England. Its 100,000 inhabitants reside entirely in rural areas or rural hub towns, and a third are over the age of 65. The Broads Authority extends into the eastern part of the district, although the major part of the Broads is in the district of Broadland, to the south, and in South Norfolk. Because North Norfolk is an area of significant agricultural production, covered by AONB (Area of Outstanding Natural Beauty) and SSSI (Site of Special Scientific Interest) designations, that has been affected by water quality challenges, nutrient neutrality policy is holding up many planning applications, as some of its water courses (e.g. the river Wensum) are already affected by nutrient pollution and the requirement to mitigate upstream of potential discharges (on land which applicants do not own) presents a critical challenge.

North Norfolk adopted its current Local Plan in 2008 and last updated it in 2010. It is currently preparing a new Local Plan. Its current plan references the Council's 'rural exception site policy' in SS2 ('Development in the Countryside'), giving further detail in clause 3.2.14. The countryside is not regarded 'as an appropriate location for new house building' but '[…] in order to contribute to balanced communities in rural areas affordable housing will be permitted outside selected settlements as rural exception sites'. Further detail on selection policies for RES are given in Policy HO3 (i.e. demonstration of local need; RES must be and on sites within 100m of village boundaries for 10 or more dwellings; for less than ten, the new homes will adjoin an existing group of ten or more houses. Affordability must be assured in perpetuity. The emerging Local Plan (2016-2036) contains a specific policy on RES (HOU3), which builds on HO3. There is strong support for delivering affordable homes on rural exception sites, but also two significant concerns around the use of cross-subsidy. The first is that 'the Council will only support the inclusion of the minimum number of market homes to make a rural exception scheme deliverable'. The second (which is stated in bold text in the Local Plan), is that the 'additional value created by the inclusion of market housing should not be reflected in the price paid for land'.

In short, market homes must be essential for the viability of a scheme. North Norfolk therefore insists that where such homes are shown to be essential, the number should be kept to a minimum. The preference is clearly for 100% affordable homes, but in practice pragmatism may override preference.

The new Local Plan maps those rural areas that are 'designated' (Figure 11, p. 119 of the Plan). The RES approach set out in Policy HOU3 applies in the 'designated' Countryside Policy Area. This map also highlights particular villages as 'large growth' (Blakeney for example) or 'small growth' (including Binham and Trunch).

The Broads Authority adopted its Local Plan in 2019. It follows North Norfolk's approach

to cross subsidy on RES: i.e. that market housing should be kept to a minimum and involve 'small numbers'. The Authority is currently reviewing its Local Plan and published an Issues and Options consultation in October 2022. It notes that the current Plan remains extant. 101 affordable homes were delivered on rural exception sites in North Norfolk between 2017 and 2022. The rate per 10,000 population was 11.3 homes during the same period. 80.1% of non-major applications were determined within 8 weeks during the 24 months to September 2022. The Council appears to effectively balance plan-making and development management, having been focused on a plan review during these data reporting periods. North Norfolk also works closely with the Broads Authority.

First level – strategy and corporate priority

First-level interviews were conducted with the Housing Strategy and Delivery Manager (who had been at NNDC for 6 years, following a long period in Bristol focused on the delivery of new council homes) and the Development Manager who had fulfilled several roles at NNDC over an 18-year period. A second interview was conducted with the Community Housing Enabler (6 years at NNDC) and a Team Leader within Development Management (who had spent 9 years in the planning profession and 18 months at NNDC). It was emphasised at the outset that the majority of affordable homes within the district are expected to be delivered on market-led developments in towns and larger villages. Affordable Housing on these allocated sites could be 45% or 50% of the total, but also up to 100% in the case of RP developments with grant support. Affordable housing on market-led sites was allocated to tenants on the basis of greatest need, whereas RES allocation was based on demonstrable housing need combined with strong local connection. This meant that development on allocated sites was often more controversial, and contested, than development on RES – because RES homes were perceived to be directly serving local communities, whilst general affordable housing was often let to people moving in.

Political support for RES development in villages was said to be strong at the Parish Council level, as exception sites are the only means of satisfying local need for affordable housing in a mainly rural district. The majority of villages have an acute housing need and therefore the majority of councillors, particularly those representing rural areas with small villages (where there will never be allocated sites), support development on RES '95% of the time'. But despite support for RES from many Parish Councils, many residents of North Norfolk are mortgage-free home-owners who have retired to the area from other parts of England. Their occasional opposition to development is often counter-balanced by support from more liberal and wealthy local households (whose families have lived in the area for generations) who support RES as a means of ensuring that pubs, restaurants, and vital services remain viable.

It was suggested, by respondents, that the district has a very 'open' housing need register, making it very easy for households to register a need (there are presently 2,500 applicants on the register), and therefore very easy for the housing team to identify those with the strongest local connection. A cascade approach to allocations (giving priority to the strongest local connections and seeking to allocate to those households first) strengthens

the perception that RES housing is for local people. Having an open register avoids having to always undertake costly surveys of local need, although such surveys can be useful where local support is not certain.

Site selection for RES was aided by a grant from the Community Housing Fund (£2.4 million) a made in the remaining village in order to secure access to the council-owned site.

The project gestated in the early 2010s, when government was seeking to reduce grant levels for housing and introducing 'affordable rent' (which required less grant). RPs were bidding for money from a shrinking pot, often securing only 50% of what they had previously received for affordable homes. Broadland decided that an alternative way needed to be found. The combination of available council land and the introduction of cross-subsidy on RES, from 2012 onwards, presented the partners with this alternative way. The innovation was the spreading of cross-subsidy from higher to lower value sites: 'we're not talking about five locations here that were absolutely on the money, we had probably three of those, and two on the periphery'.

The partners worked together to establish the level of need: evidence from NNDC's housing register was augmented by targeted surveys conducted via social media by Broadland HA, focused on getting a better picture of market demand (to inform calculations of likely revenues) and to understand possible resistance to development. The evidence gathering stage helped provide a clearer picture of communities' aspirations, providing the cues needed for Broadland and for NNDC's Community Enabling Officer. Three architects were employed to design houses appropriate to each location.

NNDC officers drew up the legal agreements, including the Section 106 linking the sites, and the agreement to transfer those sites to Broadland, whilst external consultants were engaged to present the linked scheme as a complete package to Development Management. That package saw some villages (e.g., Binham) with clearly more housing and more cross-subsidy than was needed to achieve site viability. Planning officers were said to favour formal legal agreements, tying together the sites and specifying how and where Section 106 funds would be used: it was felt that a 'half-cocked story' would not have elicited a positive response from planning. On the other hand, Broadland were said to prefer a less formal approach, starting with a clear outline that could flex as a project progressed. Open discussions between the RP, the enabler, Housing Officers and Development Management were said to be essential. Good working relationships are crucial.

As an epilogue, there is clearly an appetite to bring forward more linked schemes in the future. One currently in the pipeline involves six sites, all with different landowners, and will not feature a single Section 106 agreement. But there is reason for optimism: Homes England were said to be 'super with it', having recognised the merit of the approach and understood the need for a flexible funding approach.

Key learning

This case study illustrates:

- The role of a skilled RP partner, adept as working with the council and communities, and advancing powerful public interest arguments in favour of building rural affordable homes;
- The importance of good, open, working relationships between key partners, resolving difficulties early on through open dialogue;
- The shared responsibility for evidence gathering, with housing register evidence localized and enhanced through targeted surveys conducted by the RP; moreover;
- The importance of innovation, in this case manifest in 'linked schemes' (some with market housing and some without) where cross-subsidy is generated on higher value sites and is moved to support lower value schemes. Such linking may face community resistance, where a particular village is being asked to host more housing – hence the importance of mobilizing strong public interest arguments;
- How different sites with a single landowner (e.g. a council) may be linked, for the purpose of multi-site cross subsidy, by a single Section 106 agreement. Other arrangements may be preferable where multiple landowners are involved.

Case Study 6: York, North Yorkshire & East Riding

Case Study 6: York, North Yorkshire & East Riding Strategic Partnership – Critical Support for Rural Housing Enablers

Planning policy context

Until 1 April 2023, North Yorkshire was a county council covering the districts of Craven (mainly rural, 0 units delivered on RES between 2017 and 2022), Hambleton (mainly rural, 24 units on RES), Harrogate (urban with significant rural, 0 units on RES), Richmondshire (mainly rural, 0 units on RES), Ryedale (mainly rural, 15 units on RES), Scarborough (urban with significant rural, 12 units on RES) and Selby (mainly rural, 0 units on RES).

The local plans for each of the 7 districts and boroughs listed above remain extant. Craven's Local Plan was adopted in November 2019 and runs to 2032. It contains a policy on affordable housing (H2) that references RES. Strong support is given to schemes comprising 100% affordable housing. Where market housing is essential, it must comprise no more than 30% of the scheme. Hambleton's Local Plan was adopted in February 2022 and runs to 2036. Policy HG4 ('Housing exceptions') sets out the approach to First Homes Exceptions (essentially relaying NPPF policy) and RES. Its policy is similar to that of Craven: a proposal for a rural exception site must provide 100% affordable housing, unless it can be demonstrated that an element of market housing is essential to enable the delivery of the affordable housing'. Harrogate's Local Plan was adopted in March 2020 and runs to 2035. There is no reference to RES in Policy HS2 ('Affordable housing'). However, Harrogate's policy reflected the 2016 Written Ministerial Statement relating to affordable housing thresholds: 'on developments comprising six to nine dwellings in areas designated as rural areas under Section 157(1) of the Housing Act 1985, a financial contribution for the provision of affordable dwellings as a commuted sum will be sought unless the developer makes on-site provision'. Richmondshire's Local Plan was adopted in December 2014 and runs until 2028. It is currently under review. Policy CP6 of the extant plan ('Providing Affordable Housing') is supplemented by detailed consideration of cross subsidy on RES. Cross subsidy will be allowed where grant in unavailable, reduced grant makes the scheme unviable, or the applicant is a CLT. It adopts a minimum approach: 'The maximum number of open market dwellings permitted will be the minimum required to subsidise the development of the affordable housing. The Council will expect an 'open-book' approach to any application to cross-subsidise on an exception site and will not accept any land valuations which exceed comparable financial transactions in the Plan area'.

Planning in Ryedale was previously split between the District Council and North York Moors National Park (NYMNP). Ryedale's Local Plan covers the period 2012 to 2027. Policy SP3 ('Affordable housing') references NPPF cross subsidy: 'policy support for this [i.e. cross subsidy] has been included in the Plan on the basis that is an approach designed to support and cross subsidise the delivery of affordable housing in the absence of sufficient public subsidy through Registered Providers. It is not a policy which has been included in this Plan to encourage the release of sites through the inflation of land values'. SP3 references the 'minimum number' rule that is common to local authorities keen to ensure

that cross subsidy is permitted only where it is essential. Scarborough's Local Plan is under review. Its current plan was adopted in July 2017 and runs to 2032. Policy HC4 is specifically concerned with 'rural exceptions housing'. On cross-subsidy, it states that 'Open market housing will only be permitted to the scale at which it is proven to make the scheme viable'. Interestingly, it notes that 'potential rural exception sites [were] identified following the assessment of sites that were submitted by landowners through the plan making process' (p.59). Finally, Selby's Local Plan was adopted in October 2013. Policy SP10 ('Rural Housing Exceptions Sites') reiterates the NPPF's position of cross-subsidy involving 'small numbers' of market homes. It notes that future policy will be more detailed. The pre-publication Local Plan (for consultation) contains a new RES policy (HG8). This re-iterates the 'small numbers' position but extends the policy to cover First Homes Exceptions Sites.

The North York Moors National Park Authority's Plan (covering part of Ryedale) was adopted in July 2020 and runs to 2035. Policy CO11 ('Affordable Housing on Rural Exception Sites') notes that an element of 'principal residence housing' will be permitted on RES, to support financial viability, where a scheme is in a 'Larger Village'. The Park Authority does not wish 'cross-subsidy housing' to become second homes and will apply residency restrictions to prevent this from happening. The RES policy is supplemented with detailed discussion, including the rule that RES cannot exceed 12 dwellings in size.

The planning functions of Yorkshire Dales National Park also extend into the new unitary authority of North Yorkshire, covering much of Craven and Richmondshire. The Park is reviewing its 2015-2030 Local Plan because the area of the Park has been extended and therefore a new plan is required. The new Local Plan will cover the period 2023 to 2040. Policy C2 of the extant plan deals with RES, setting out a standard approach that also requires exception sites to meet the Park's development quality standard (SP4). There appears to be no reference to cross-subsidy and how the RES approach might evolve in the new plan is not yet clear.

There are multiple plans setting out the position of North Yorkshire Council regarding RES. They all agree that cross subsidy should be restricted to the minimum required to support viability. The policies are all similar, varying only in detail. Some detailed policies belong to authorities that did not see the delivery of affordable homes on RES.

Although this case study centers on North Yorkshire, the York, North Yorkshire & East Riding (YNYER) Partnership extended, as its name suggests, into East Riding. East Riding of Yorkshire Council is another unitary authority. Its Local Plan was adopted in 2016 and is now being updated (to reflect recent changes to national policy set out in the NPPF). Part C of Policy H2 of the extant plan restricts exceptions to larger villages, although they are acceptable further down the settlement hierarchy if they 'relate to' the development boundary. Schemes comprising 100% affordable homes are preferred, but where cross-subsidy is needed to support a scheme, it cannot exceed 20% of the unit total.

A total of 51 affordable homes were delivered on RES during the reporting period – and another 30 in East Riding. Craven's turnaround of planning applications slipped to below 68.8% in 8 weeks in the 24 months to September 2022. Other figures were Hambleton (87%), Harrogate (88.9%), Richmondshire (69.4%), Ryedale (87.4%), Scarborough (68.2%) and Selby (79.4%). East Riding's turnaround figure was 93.7% during the same period, placing it

in the top decile of rural authorities for this measure of planning performance.

This case study is diverse in terms of planning frameworks and performance. It is focused on the YNYER Strategic Housing Partnership and its purpose, mechanics and achievements in relation to rural housing enabling.

This special case focuses mainly on the support provided by the York, North Yorkshire and East Riding Strategic Housing Partnership (YNYER SHP) to the enabling service across the area. But it also has a secondary focus on RES delivery across the two National Parks (the 'Dales' and the 'Moors') as critical differences were identified between the two parks, which are pertinent to the enabling function and what it is able to achieve in different planning contexts.

Six interviews were undertaken: with the YNYER Partnership coordinator, planning officers in East Riding, the enabling officer based in East Riding, and the heads of the planning services in the two National Parks.

The YNYER SHP has been in existence for more than 15 years (at first it covered just the North Yorkshire 'patch' but eventually extended to East Riding). Historically (prior to Local Government Re-organisation in North Yorkshire), the Partnership was overseen by a Housing Board comprised of elected members from the constituent authorities (including the National Parks) and representatives from Homes England, Registered Provider partners, and the Home Builders Federation. The Partnership has a broad focus on housing delivery, on a mix of allocated and exception sites. There is a RHE Partnership embedded in the wider partnership, which provides the core focus of this case study. The 'North Yorkshire and East Yorkshire' (NYEY) RHE Partnership is coordinated by the Housing Strategy Manager at North Yorkshire and extends across rural North Yorkshire and East Riding. There is a team of dedicated enablers, covering North Yorkshire and East Riding.

The NYEY RHE Partnership is funded by the local housing authorities, National Park Authorities and RP partners. Co-funding in-house rural enablers has been a key part of the NYEY RHE Partnership from inception. A key aim of the Partnership has been to localize support for the housing enablers and tie it to delivery.

A question mark has hung over independent RHE funding across England for a number of years. Bouts of short-term government funding have not provided the long-term support that enabling needs in order to support and coordinate local projects that can run over several years. The NYEY RHE Partnership addressed this challenge through a co-funding structure that draws together contributions from the local authorities, national park authorities, and RPs who pay a grant contribution and a fee for each affordable home added to their portfolio through the programme.

This shared funding arrangement provides significant continuity for the housing enablers, which are viewed as vital for project delivery. There are 23 RPs operating in the YNYER SHP

area and 16 of these pay retention fees and are involved in the recharge mechanism. There has been sufficient funding for three full time RHEs in North Yorkshire and one 0.5 RHE (2.5 days per week) in East Riding until 2023/24.

Across North Yorkshire, the majority of affordable homes are delivered on allocated sites through Section 106 agreements. Between 2012-13 and 2021-22, the NYEY RHE Partnership facilitated the delivery of 2,224 affordable homes, with just 266 of these completed on RES. Exactly 10% of affordable homes were completed on RES in 2021-22. The YNYER Partnership's focus is broader than exception sites. It seeks to maintain corporate and political focus on housing delivery, with the NYEY RHE Partnership concentrating on delivery in rural communities across the patch. The NYEY RHE Partnership meets at least twice a year.

Beyond the innovative funding arrangement for RHEs, the Partnership is concerned with sharing best practice, through regular events, training, and through the Partnership's website.

To understand the challenges faced by housing enablers across the case study area, and the on-the-ground benefits of the Partnership, it is instructive to briefly consider two contrasting experiences of RES delivery. Interviews were conducted with planning officers in East Riding and with that authority's in-house RHE. There was agreement that East Riding is on the 'fringe' of the Partnership, although the 'handrail' it provides is greatly valued. The intensity of enabling activity is greater in North Yorkshire, in which the two National Parks – the Dales and the Moors – have significant presence. Interviews were also conducted with the planning leads of the two Parks.

The Yorkshire Dales National Park Authority had considerable success with RES in the 1990s and into the early 2000s, but the number of schemes coming forward was said to have 'dried up' since then. The NPA aims to deliver 20 affordable homes each year, but is not currently achieving that target. Landowner reluctance was thought to be the key explanation for stunted delivery, especially in the northern and western sections of the Park. The situation had been rosier in the southern section until recently, but now all parts of the National Park are seeing a lack of land for affordable housing development. The Partnership was valued, but not viewed as a means of overcoming land barriers. The pivot towards allocated sites offered some hope, but a sense of 'market failure' led to the conclusion that a more muscular approach might be needed, extending to the compulsory purchase of sites outside designated settlement boundaries at a price that would support affordability.

The experience with the North Yorkshire Moors National Park Authority appeared to be very different. It was noted that house prices in the Park are not as high as they are in other parts of the country, but earnings are low, driving a critical problem of affordability. Because the Moors contains only half of one larger town, Helmsley, the area is almost 100% dependent on RES and actively promotes their development. The NPA does not allocate sites for housing in its Local Plan, other than in Helmsley, and there is 'absolutely no market housing' allowed for the purpose of cross-subsidy on RES. However, in exceptional circumstances it will allow for some Principal Residence housing which is restricted to occupation by those

for whom this is their principal home. The Local Plan seeks to facilitate a plot price of £10,000 to support affordable homes on RES, with the interviewee repeating the claim (aired in the Peak District National Park – see Case 3) that National Park Authorities must 'hold the line' on land price in protected areas. The understanding on the part of landowners (and they tend to be larger in the Moors) that nothing but affordable homes will be permissioned in the Park supports delivery. The NPA provides a free pre-app service, which was said to be 'within the spirit' of the partnership. Delivery on RES in the Park was said to be possible because of the proactive work of the local RHE on the ground. The Moors works closely with the RHE and its RP partners. Close working means regular meetings between the RHEs and the Head of Strategic Policy; keeping the pipeline of sites under review; and proactively identifying villages where there is little activity, and seeking to catalyze it in those locations. In fact, the interviewee in the Dales referenced the Moors' 'project management' approach as a possible explanation for contrasting outcomes. Housing enablers are clearly important, ensuring longevity and shared learning across critical partnerships. The more deeply embedded the enablers (with partners and communities), the more successful they tend to be. Whilst this might be a factor in the Moors' relative success with RES schemes, it was pointed out that the Dales endures a more difficult geography, comprising smaller and less accessible villages. It was also said to have fewer delivery resources in comparison with the Moors, which also enjoys the advantages of an easier, more accessible geography.

But another critical difference lies in contrasting approaches to housing delivery, reflected in local plan policies. Some authorities allocate housing sites and some do not. The Dales has been leaning towards 'Section 106' (especially in the south of the Park where more options are available through allocations, although RES will feature in the Dales' Plan for 2025-2040 and will be pushed harder in the north of the Park where options for allocation are significantly lacking) whilst the Moors is 'all RES' (the only allocated sites are in the town of Helmsley: it was noted that whilst the vast majority of LPAs allocate housing sites across their areas, some National Parks do not allocate sites outside their main town, instead relying on a RES approach). Landowners will not go down the RES route if there is a chance of their land being allocated for market housing. Ebbs and flows in RES output track the planning cycle and the hope and prospect of planned allocation. The hope of allocation underpins the hope of achieving a higher land price (on RES), greatly reducing the chance of sites coming forward. Yet, against the backdrop of Local Plan support, rural housing enablers have a critical role to play in supporting the development of relationships, and the project management, that is crucial to the delivery of affordable homes, either on allocated or exception sites. The importance of finding a sustainable way of funding enablers is the critical lesson from this case study.

Key learning

The case study shows that:

- Rural housing enablers play a critical role in building the enduring relationships that are key to successful rural exception site delivery;

- Higher level strategic partnerships help maintain corporate focus on rural housing delivery, with positive implications for ground-level work, including the work of RHE; RP-authority funding partnerships provide a means of securing long-term support for enablers, tied to housing delivery through the combination of an RP retention fee and a per-unit recharge mechanism;
- Local 'project management' of the development pipeline, involving local authority and RP partners working alongside the housing enabler, helps to maintain the focus on RES delivery;
- RES outcomes cannot be 'unhitched' from the local plan: RES activity may decline during plan reviews if landowners perceive a chance of allocation. Local plans that allocate a significant number of housing sites may have less RES activity, whilst those with no allocated sites, outside of larger towns, may have much more. This is particularly true of protected areas.

PART 8: CONCLUSIONS, KEY MESSAGES, AND ACTIONS

8.1 This project has been guided by one overarching question, what underpins success in the delivery of rural exception sites?, split into three sub-questions, i.e.

- **How does local authority resourcing of the planning function affect the success of RES?**
- **How can local authorities mitigate resource shortcomings through local working practices and innovations?**
- **Besides planning resourcing, what other factors/practices/policies underpin successful RES schemes?**

8.2 The task of this conclusion is to present answers to these sub-questions by drawing on the findings of the survey and cases. Insights from the review of extant literature and the national scoping conversations are not repeated here. Therefore a more thorough overview of the research is provided in the Executive Summary.

The Survey of Rural Planning Authorities

Resource constraints

8.3 Two thirds of planning authorities reported resource constraints, with a small number unable to offer pre-application services for small rural housing schemes at all, and some providing a truncated service.

8.4 The same proportion agreed that the planning service, and planning officers, were under significant work pressure. This was leading to high rates of staff turnover and a loss of experienced staff. However, the majority of authority respondents felt that sufficient experience and capacity had been retained, allowing them to deliver an effective planning service overall.

8.5 Regular national policy shifts were felt to compound stretched resourcing, adding to the pressures faced by planning authorities. However, it was also felt that engagement with new challenges – bio-diversity net gain and nutrient neutrality – makes planning an

exciting and stimulating profession. Despite work pressures, planning authorities believe that the quality and timeliness of the service they provide is maintained.

8.6 Very few planning authority respondents felt that the shift to home working had adversely affected planning services. Many claimed that it had aided efficiency by reducing the amount of time lost to commuting, although less interaction with colleagues could mean less sharing of experience and good practice.

Impacts of constraints

8.7 Two thirds of respondents saw no significant impact on the general planning service from resourcing: 60% pointed out that decision timeframes were unaffected. A clear majority of authorities said that they had the resources needed to deliver their local plan.

8.8 Notably, few respondents were aware of, or had been involved with, housing delivery on RES. The majority of authorities were focused on the delivery of allocated sites.

8.9 Engagement with communities, RPs, and landowners – for the purpose of delivering small rural housing sites – was viewed as the responsibility of housing colleagues. RES were not felt to be something that needed to be addressed strategically or proactively. They are, by their nature, incidental and occasional.

Mitigation, where needed

8.10 Half of all respondents saw working with either an LA-based enabling officer or an independent RHE as an effective means of supporting housing delivery. There was strong overall support for the idea of enabling.

8.11 Out-sourcing some planning functions to consultants was viewed as a means of generating efficiencies, but consultants had not be used to facilitate RES. This was the domain of enablers, LA-based or independent.

8.12 Planning authority respondents did not believe that extra training was required in respect of RES delivery, either because this responsibility lies with housing or because of the incidental and occasional nature of these schemes.

8.13 Sharing good practice across authorities was considered key to increasing capacity.

8.14 Neither informal sharing of staff or formal 'shared service' arrangements were viewed as
panaceas for resource shortcomings: very few respondents, just 15%, saw any local benefit from such arrangements.

8.15 However, 47% of respondents agreed that planning authorities are able to mitigate resource constraints by changing working practices, partnering with others, and making less go further, which appears to be at odds with the apparent reticence around sharing staff resource, informally or formally.

8.16 Such contradictions may suggest concerns around capacity paired with uncertainty around the best ways forward. Authorities learning from one another was judged to have clear benefits, but those same authorities view dedicated in-house resources, which allow them to guarantee a high quality and timely planning service, as being key to overall delivery.

What local planning authorities need

8.17 Local planning authorities highlighted the importance of:
- Being able to fill senior posts, and therefore having the experience needed to fulfil complex tasks well (and also having leadership capacity);
- A stable policy framework, which supports certainty and gives officers the confidence and space to do their jobs;
- Investment in skill development at all levels, with apprenticeships flagged as an important way of supporting the planning profession;
- Greater flexibility in respect of work/life balance, in order to increase the appeal of local authority planning for a range of groups;
- Increased application fees, to support greater capacity and upskilling in planning teams;

The Six Case Studies

Accounting for success on RES

8.18 The following table notes key learning from the six case studies, arranged to

support headline messages from this stage of the project:

Table 8: Main messaging and key learning from the case studies

Factors advancing RES include the following, which are evidenced by particular experiences emerging from the listed case studies. **These experiences may of course by common to other areas, including the other case study areas discussed in this report.**

High level political support is crucial	
Strong political leadership, manifesting itself as determined and positive processes and engagements, is key to RES delivery	All case studies
Aspirational housing targets are valuable in headlining an area's ambition to combat socio-economic exclusions centered on housing market pressures	Cornwall
Political support may beget local financial support, driving resources into schemes to ensure their viability	Derbyshire Dales
A clear corporate focus on rural affordable housing, sometimes extending to direct local authority delivery (with development partners), will drive delivery across local authority housing and planning teams	Winchester
Close working with communities, building evidence and support, provides the essential foundation for projects	
Key delivery partners (councils, RPs, and enablers) must engage in close working with communities, to evidence need, and to build support for affordable housing	Cornwall/ North Norfolk
Use of secondary data and alternative approaches to monitor and map housing - need as the evidence base to support RES development e.g. Shropshire's online portal: the Right Home, Right Place initiative	Shropshire
Community opposition poses a key challenge to rural development: development partners (local councils, RPs, and landowners) need to devise strong proposals that are well-evidenced, but also address community concerns around the scale and form of development	Shropshire
Parish councils must navigate the contradiction between in-principle support for affordable housing and nervousness around specific sites. They need to work with partners, but avoid jumping at a particular site too quickly	Derbyshire Dales
A strategic search for sites (tracking the SHLAA or SHELAA process) can help direct a local authority to conversations with particular Parish Councils and development partners	Winchester

Building long term delivery partnerships results in smoother projects and reduced risk	
Strong, open, working relationships between all key development, community and landowner partners, resolving difficulties early on through open dialogue is vital	North Norfolk
Investment in long-term relationships contributes to de-risking projects and smoothing planning processes	Winchester
A trusted private development partner can play an important role in RP or local authority projects	Winchester
A skilled RP partner, adept as working with the council and communities, and advancing powerful public interest arguments in favour of building rural affordable homes will help drive a programme of affordable housing delivery	North Norfolk
Higher level strategic partnerships help maintain corporate focus on rural housing delivery, with positive implications for ground-level work, including the work of LA-based and independent RHE	North Yorkshire
Local 'project management' of the development pipeline, involving local authority and RP partners working alongside the housing enabler, helps to maintain the focus on RES delivery	North Yorkshire
Effective and sustainable LA-based and independent enabling provides projects with ongoing support	
Effective joint working between LA-based enabling officer(s) and independent RHEs (in this case, under the auspices of the HARAH programme) provides capacity and drives RES delivery	Winchester
Rural housing enablers play a critical role in building the enduring relationships that are key to successful rural exception site delivery	North Yorkshire
RP-authority funding partnerships provide a means of securing long-term support for enablers, tied to housing delivery through the combination of an RP retention fee and a per-unit recharge mechanism	North Yorkshire
Cross-subsidy arrangements that support delivery and affordability must adapt to different situations	
Tailored cross-subsidy policies that reflect local market realities (setting levels of permissible market housing components depending on land values) play a role in maximizing affordable housing delivery	Cornwall
A pragmatic approach to cross-subsidy is one of a number of means of bringing sites to viability	Winchester
Small projects can, in some circumstances, be made viable through a clear planning approach in instances where all affordable rural housing is exceptional, and none is on allocated sites	Derbyshire Dales
'Linked schemes' (some with market housing and some without) where cross-subsidy is generated on higher value sites and is moved to support lower value schemes may be helpful. Such linking may face community resistance, where a particular village is being asked to host more housing – hence the importance of mobilizing strong public interest arguments	North Norfolk

Mixed funding models, including direct council build, are crucial and will depend on local circumstances	
The potential of direct provision by councils, on allocated and exception sites, and of utilizing mixed funding that may include sustainable borrowing and HRA revenues, to support ambitious housing programmes, although where HRA revenues are utilized, the homes delivered will be subject to the Right to Buy.	Cornwall
Supportive planning and spatial development strategies provide a broader context for RES success	
Spatial development strategies that support a 'dispersed approach', utilizing a mix of allocated and exception sites, will advance the use of RES.	Cornwall/ Shropshire
RES outcomes cannot be 'unhitched' from the local plan: RES activity may decline during plan reviews if landowners perceive a chance of allocation. Local plans that allocate a significant number of housing sites may have less RES activity, whilst those with no allocated sites outside of larger towns, may have much more. This is particularly true of protected areas	North Yorkshire
In areas of dispersed population, smaller settlements, and hence small market schemes, the exempting of developments (of 10 units or fewer) from contributing to affordable housing Section 106 agreements has potentially made it more difficult to fund smaller RES schemes (which then have to grow to achieve viability). This national policy, enacted in 2016, should be reversed in protected rural areas.	Shropshire

8.10 Mapping the key messages

Taken together, the different parts of the project allow us to map key messages, and unpack these into key actions. Whilst the project has focused on RES, these messages and actions apply to the delivery of all rural affordable housing:

The centrality of political support	A corporate emphasis on supporting RES is fundamental to the success of these small rural schemes; that corporate emphasis brings senior officer support and mobilises an ecosystem of activity, at all levels, that aims to evidence need, win support and bring forward sites for development.
	Action for LAs: clear messaging in support of affordable housing and its vital importance to rural communities is needed at an authority level, backed up by proactive planning and funding policies.

The critical role of enabling	Enabling comprises the independent RHE network and LA-based generic and rural enablers. Both play key roles in RES delivery, pointing to a need for additional LA capacity for enabling and a strengthened RHE network, with sustainable funding.
	Action for LAs and government: dedicated funding for rural housing enabling within local authorities plus consistent national and local funding to the independent Rural Housing Enabling network.
Adaptive cross-subsidy arrangements	Whilst clarity is needed on cross-subsidy, different places (and market circumstances) tend to need different arrangements. Clearer guidance is required on viability and land values (so planning authorities can design consistent policy within a national framework).
	Action for Government/Homes England: Issuing of national guidance to RES partners on viability, cross-subsidy, incentives, and land values – forming part of a broader RES (or 'rural affordable housing') toolkit.
Building delivery partnerships	Local authorities and delivery partners, including RPs and landowners, play critical roles in RES delivery. Coverage of RPs in remoter rural areas is crucial, as is local authority resourcing, and positive relationships with landowners, extending to good practice and guidance concerning cross-subsidy and landowner incentives.
	Action for Homes England: resourcing to rural authorities to reflect the challenges of working with multiple under-resourced partners, and incentives for RPs to extend their reach into under-served rural areas.
Working with communities	The case for affordable housing, and for RES, needs to be won among communities. This begins with robust evidence of need that hopefully underpins community support. But resistance can remain, requiring delivery partners to design clear, viable, and well-evidenced proposals.
	Action for Homes England and partner groups: a RES (or RAH) toolkit addressing practices and engagements, including via social media, that help win support for rural housing projects, whilst illustrating good practice in evidence gathering.

Funding flexibility and clarity	Local partners are innovating different funding solutions for RES, mixing various sources of grant funding and finance. This flexibility is important and different areas need to share their experiences. Homes England needs to be part of this conversation, working flexibly to support schemes that are 'outside the box' of standard practice, including linked RES schemes.
	Action for Homes England and partner groups: advice on mixed funding packages including in a RES (or RAH) toolkit (extending to linked subsidy schemes), and work with Homes England to support RES in under-served areas
Supportive planning and spatial development strategies	Well-resourced local planning (and housing) can stay the course, possessing the skills and understanding to support RES. The National Planning Policy Framework needs to give clearer support to RES, underpinned by a 'toolbox' for supporting small rural housing schemes that takes its cue from the messages mapped here. Local plans are also crucial for RES: they must have spatial development strategies that support RES in lowest tier settlements, in order to advance the future sustainability of England's villages and rural communities.
	Action for government: NPPF to give clearer support to RES, stressing its value to rural communities and economies. NPPF to reference a future RES (or RAH) toolkit and underscore the sustainability arguments for a dispersed development approach in many rural areas.

Appendix

Appendix 1: Literature Review

Overcoming Planning Resource Constraints and Unpacking the Factors underpinning the successful delivery of Rural Exception Sites [RES] in England

Background and purpose

A1.1 There is an expansive literature on rural housing market dynamics and on interventions that support lower-income families access the homes they need. Studies have been conducted on these issues in different contexts around the world. They often draw attention to the migration pressures that rural areas have faced over the last 50 years, as lifestyle expectations and amenity motivations bring middle class people to the countryside. New roads have often facilitated these movements. In areas of countryside, a desire to protect amenity and support the farming economy (and food security) sometimes result in tighter planning restrictions, which limit the capacity of rural housing markets to adjust to changing patterns of housing demand. We have confined this review to the delivery of affordable homes in rural England, picking out cues from recent literature that are directly relevant to our focus on rural exception sites (RES). The review should be read in conjunction with the analysis of Steering Group conversations: the shared purpose of these elements has been to establish why RES might succeed or fail, and how the resources available to planning authorities, as facilitators of rural development, impact on the progress of small rural housing projects.

A1.2 Delivering rural development is challenging. Potential opposition is strong from existing homeowners, who may not want further development to undermine their reason for living in the countryside – a peaceful life in an idyllic setting rich in amenity – or the value of their homes, which depend on the preservation of that amenity and the scarcity of housing supply Equally, planning policy often aligns with these private aspirations by limiting the scale of new development, particularly in Areas of Outstanding Natural Beauty (AONB), the green belt, or in National Parks.

A1.3 On the other hand, new affordable housing provides an essential support to the rural economy and communities, ensuring that the social vitality (reflected in the presence of mixed populations, schools, and other essential services) that all social groups need and value, is maintained. Development on RES provides a means of

circumventing standard restrictions on market-led development in support of this outcome. But even where policy in a local plan is supportive of granting exceptional planning permission for schemes that deliver against local housing need, the success of a RES scheme will depend on a number of key factors.

A1.4 This research classifies these into two broad types: general success factors, broadly the softer alliances and collaborations within communities that are needed to overcome resistance (rooted in protecting amenity, preventing change, or seeking highest potential rent extraction from land), and the capacity within rural planning authorities to maintain these alliances with sustained energy and with the hard skills needed to get projects over the finishing line. That capacity has been undermined over the last decade, firstly by the financial cuts faced by the local public sector and, secondly, by the increasing range of responsibilities placed on planning teams.

A1.5 This 'rapid review' focuses attention on these two areas: the factors underpinning successful delivery of RES, and how a lack of planning capacity affects small rural housing schemes - and how it might be locally mitigated. Our past work on rural housing delivery draws attention to a 'planning-land-tax-finance nexus' which 'constrains potential responses to the market pressures and housing scarcities' faced by many rural communities (Gallent et al., 2022:xi). A broader political economy of private land rights and public intervention, generally operating in support of those rights, has fomented a challenging environment for non-market housing delivery and incubated a focus on finding 'exceptional' means of engineering more just social outcomes that run counter to standard policy and market processes (Harris, 2021). These exceptional means extend beyond RES and include planning initiatives, across the UK, to support necessary community outcomes: e.g., 'One Planet Development' in Wales, extensions of community land rights in Scotland, and exceptions to Green Belt policy.

A1.6 RES policy, introduced in England and Wales in 1991 - following local experiments during the preceding decade, notably in the New Forest (Barlow and Chambers, 1992) - exemplify the value of circumventing rules to achieve progressive outcomes. RES, often led by disruptive enablers, establish a special case for development, gain an exceptional planning permission, negotiate a lower land price, and address the particular difficulties of smaller development projects. They rely on different sectors and actors working in concert toward a goal that has an agreed value.

Factors affecting RES delivery

A1.7 Beyond these general statements on the value and challenges of RES delivery, what do recent studies tell us about specific challenges – and about those factors that can advance or halt a project?

Community engagement and support

A1.8 Building community support, and the prospect of encountering opposition, is a key area of potential difficulty for small rural housing projects (Sturzaker, 2010). Supporters and objectors are frequently passionate about the need for development or the negative impacts they expect it to bring. The Rural Housing Alliance (RHA, 2021) offers advice in this respect, suggesting that patient alliance building in private is often more effective than organising large public meetings or consultations, which can expose entrenched positions from the outset. Engaging local residents in the design of new housing, offering to incorporate local materials and styles can also ensure support, as can demonstrating the need for affordable homes to help preserve their way of life.

A1.9 Examples exist of 'community action' aimed at building local engagement in support of community projects (Gkartzios, Gallent and Scott, 2022) although it is often noted that communities are more eager to rally around projects that directly support local services or a key community asset, such as a valued green space or a pub, than 'affordable housing' – largely because they are uncertain of its benefits or who specifically will be housed in a new development. For these reasons, the success of housing projects is often dependent on close working with communities in a process that builds understanding of why affordable homes will bring broader benefit.

Land cost

A1.10 Land cost is another key factor in the progression of RES schemes and affordable rural housing projects more generally (Best and Shucksmith, 2006). Land prices vary locally and regionally, with those prices signalling major regional economic imbalances and inequalities (Murphy, 2018) that impact on RES delivery. More specifically, RES schemes are significantly affected by land price expectation on the part of land owners and land agents. The hope of achieving a higher land value in the future (for full market residential use – land price being determined by best permissible use), which may be

entirely unrealistic, may deter landowners from releasing land for development today (this is the lure of 'speculative rent'). Hope value can be a significant brake on RES, although clearly landowners play a pivotal role in the delivery of affordable housing (Lavis, McLarty and Beedel, 2017) where good relationships are nurtured and appropriate incentives are available to encourage participation in affordable projects. Landowners may worry that affordable homes may one day be sold at a market price: they are concerned about affordability in perpetuity. The IPPR has proposed establishing rural housing burdens in England, which have operated in Scotland since 2004, ensuring that new homes remain affordable in perpetuity (Baxter and Murphy, 2018: 4). The Country Land and Business Association (CLA), who represent rural land and business owners, wish to see more homes built by, and rented directly from, landowners, at a discounted rent. To this end, they have proposed that properties built for this tenure should be exempt from inheritance tax as long as they remain 'affordable' (CLA, 2022).

A1.11 Despite the mix of guarantees (designed to assuage the concerns of landowners) and incentives (that might reduce the tendency of landowner to hold out for a higher land price in the future), land cost remains a significant barrier to RES schemes. A major success factor for RES is the willingness of landowners to release land for affordable homes today (at a price closer to agricultural value than full residential development value) rather than holding out for a higher price tomorrow (when a future local plan might allocate their land for full market development) (Gallent and Bell, 2000: 378). Not much has changed since this analysis, except perhaps adjustments to the regulatory environment, with new policies introduced to increase home ownership (such as First Homes, to which we will return below). Often landowners recognise an alignment of interests with communities and housing providers in terms of meeting local need – including housing for agricultural workers, especially where those landowners comprise large estates with a tradition of stewardship that extends to providing homes for estate workers (Gallent et al., 2022). Often, large landowners with experience of managing tied cottages, will opt to remain in control of rented accommodation, even if they have used the services of an RP to build the homes in order to reduce their risk, while at the same time securing a long term income stream for their descendants.

A1.12 Moore (2021: 27) argues that landowners and communities share a common 'place attachment', which is instrumental in the decision to offer land to Community Land Trusts (CLT). It extends the notion of the paternalistic landlord, playing a critical role in long term stewardship.

Community governance and Parish Councils

A1.13 Issues of community and landowner support may be resolved in Parish Councils, which provide a critical interface between landowners and other community interests. Baxter and NMurphy (2018: 23) note how parish councils facilitate affordable housing projects alongside enablers, which are either embedded in local authorities (i.e. generic or rural LA-based enablers) or sit within voluntary networks (i.e. independent enablers). Parish Councils play a critical role in winning local authority support for the principle of RES ahead of actual sites being identified or landowners being approached to release land for community development. Their support is critical in negotiations with landowners and in driving forward the planning process.

A1.14 By operating within a Neighbourhood Planning process, the role of Parish Councils in RES schemes has arguably become more critical (Field and Layard, 2017: 106). Neighbourhood Development Orders – which are now part of the NDP toolkit – can be used to advance permitted development rights for community projects (Sturzaker and Shaw, 2015: 603). We have previously noted that 'numerous examples of neighbourhood plans framing community-led housing in England' exist, and 'those plans […] can change basic 'game rules' [allowing communities] to take charge of aspects of local planning and adapt it to their own particular circumstances' (Gallent et al., 2022: 130).

Rural housing enablers

A1.15 But although Parish Councils will play a critical role in supporting RES, they may lack a broader awareness of 'what works' in relation to these housing projects and may not have a wealth of experience on which to draw. Rural housing enablers have been identified as critical champions of RES, possessing the independence and experience needed to champion projects and act as 'honest brokers' between key partners. Yet in recent years, a shortage of rural enablers has been identified as a significant obstacle to RES delivery. Webb et al (2019) report a decline in numbers and increasingly patchy coverage. RES projects may run over several years. Enablers play a critical role in maintaining the momentum of those projects and the enthusiasm of partners. Where enablers are absent, it is left to other partners (key individuals in Parish Councils or RPs) to hold networks together and ensure that projects move forward. This may be easier in

more affluent communities, with a store of social capital and active citizens, than in more deprived or left behind places which lack the requisite networks and capacities. It has been observed that neighbourhood planning is more likely to progress in affluent communities (rich in social capital, transmuted from economic capital), and the same is likely to be true of project enabling in the absence of a public or voluntary sector support for 'external' rural housing enablers.

A1.16 Such external enablers are a critical plank in community support and their absence may go some way towards explaining significant regional variations in community-level project delivery (Brown and Bright, 2018) linked to the facilitation of critical partnerships.

Effective partnerships

A1.17 The strength and nature of partnerships between groups within the community (centred on parish councils) and those external to it, including registered providers are crucial to effective RES delivery. These partnerships come to embody different forms of knowledge: the local, lay and personal knowledge needed to build support for housing projects; and the specialist and technical knowledge needed to effectively interface with planning authorities and critical parties, including sub-contractors, in the development process (McDermott, 2010) and of course potential project funders, including central government ones (Moore, 2018). On the plus side, partnerships between communities and RPs can ensure that planning processes are navigated more smoothly and that funding is secured for actual development. However, the 'activist' objectives of communities versus the 'technical' or 'professional' considerations of experts can be a cause of friction that may derail projects (Jacobs and Manzi, 2020). 'Life-world' and 'system-world' tensions are a recurrent focus for social science (following Habermas), boiled down into the frictions that exist where the raw ambitions of interest groups are circumscribed by system constraints. In relation to RES, it is very important that communication happens early on and expectations are managed.

The policy framework

A1.18 The policy framework can mean the National Planning Policy Framework (NPPF), which has been subject to regular modification, or the way in which national policy is interpreted and implemented by local planning teams within local frameworks. The focus in the next section is on the resources and skills available to planning authorities

as they seek to deliver an effective planning service (effective in terms of the certainty it offers development actors and communities, and its timeliness) and support RES. Many authorities struggle to recruit and retain planning officers, not least because higher pay and better career prospects in the private sector may drain public planning authorities of the capacity and experience needed to deliver an effective service. It is an oft-cited statistic that a quarter of planning authorities in England do not have an adopted local plan and 30 percent of adopted plans are more than 5 years old. Although there may be political impediments to plan adoption, these figures are generally viewed as evidence of under-resourced local planning services in England.

A1.19 Having an adopted and up-to-date plan is important as local plan policies provide critical supports for affordable housing delivery. Local authorities may have thought long and hard about the wording of policies, also ensuring sufficient flexibility in order to promote the greatest supply of affordable homes in the widest range of situations. The same flexibilities are needed from Highways Authorities, to ensure that RES are not hindered by apparently challenging road geometries that might be easily overcome. Policy needs to be supportive, giving a positive push to RES rather than simply listing the barriers that will prevent RES from progressing. But of course, the weight of environmental regulation on development – from net-zero requirements to nutrient neutrality – may weigh on the ability of local partners to bring forward schemes that are value for money and meet critical social objectives.

A1.20 Numerous groups with an interest in the progression of RES schemes have proposed ways to accelerate delivery through policy innovation. We are aware of the proposal to grant RES 'permission in principle' once sites have been identified, which would bring cost savings for schemes compliant with the principle, and mean that they would only need to obtain a second-stage technical details consent. The CLA has also proposed national guidelines for managing land price expectations, with the aim of encouraging its members to release sites for RES. On the one hand, it has suggested that the expected premium over agricultural (or current use) value be fixed, to the benefit of development partners and in support of affordability. And on the other, it has argued for the reduction on capital gains tax (CGT) on land sold for a RES.

A1.21 Stability in the policy framework appears to be a wish shared by many different partners. Since its introduction in 2012, the NPPF has been revised on numerous occasions. Government is also fond of setting new general directions for the planning

system. The 2020 Planning White Paper ('Planning for the Future') sought a new approach to development permissioning, more akin to the zonal systems operated in North America and many parts of Europe. Its zoning plans were hugely unpopular with urban-edge voters, causing the government to abandon these reforms and make less radical changes, set out in the Levelling Up and Regeneration Bill, that would nevertheless seek greater consistency in plan making and local policy design – through the adoption of National Development Management Policies and a National Model Design Guide. These adjustments seek greater certainty for the development sector, but are arguably less important for rural areas, and for RES, than changes to the NPPF, which have resulted in the promotion of 'first homes' exceptions that have the potential to disrupt traditional RES objectives in some rural areas.

A1.22 The instability of policy results in uncertainty for all parties in the development process (the exact opposite of government's intended outcome). The prospect of new forms of exceptions may cause landowners to hold out for a better future land price; and then, beyond the planning system, ministerial comments on extending the right to buy may dissuade landowners from participating in exception schemes at all (if they do not understand the special status of homes built on RES). Stability and certainty support a range of development outcomes that are disrupted by the instability and uncertainty rooted in constant policy change.

The funding regime

A1.23 Funding is critical to RES delivery. Grants are available via the Homes England Affordable Housing Programme. Local authorities can also co-fund delivery of RES by using Section 106 contributions (cash in lieu of on-site contributions) from larger market-led development sites, often in towns, to fund development on exception sites. However, the operational geographies of RPs (with access to Homes England funding) in England is patchy. There are 'black-spots' where RPs are not present and will not take on RES. This will act to reduce RES activity, especially in remoter rural areas where there is considerable need for additional sources of affordable housing, but where sites can be difficult to deliver and where critical viability issues may arise.

A1.24 There are other ways to deliver affordable homes in the absence of RPs. Community-led housing, often via CLTs, may be able to bridge this gap but their activities are circumscribed by more limited development expertise and by past limits on the use of the Community Housing Fund. Local authorities can also take the lead, but

schemes spearheaded by arms-length local development/housing companies have tended to be located in larger towns and have sought economies of scale that facilitate the cross-subsidy of affordable homes with market development. The Park Lanneves scheme in Bodmin, for example, taken forward by a company wholly-owned by Cornwall Council, comprised 60 homes for private rental, 9 for shared ownership, and 10 for private sale – collectively subsidising 21 social rented homes (Gallent et al., 2022: 196).

A1.25 The role of RPs in securing funding for RES goes beyond the access they have to Homes England grants. They have the expertise needed to broker deals with landowners, sometimes building homes for use by a landowner's workers or family members as a form of participation incentive. They may have extensive portfolios of rented properties and can therefore take on loans at commercial rates (on the strength of their collateral and rental income) in support of new development projects. RPs have considerable commercial development expertise and will, depending on the local policy context, become involved in building homes for sale as a source of cross subsidy for social rented units. While there are mixed views as to the appropriateness of using market housing to enable the delivery of affordable homes on RES, clearer government guidelines on the extent and forms of permissible cross-subsidy would be welcomed in some quarters. Webb et al, 2019, for example, suggest that certain forms of specialist market housing might be more acceptable on RES. These could include 'downsizer' homes for retiring households that wish to release larger homes for families but remain in a community; or private co-housing suited to particular needs and aspirations.

Build costs

A1.26 Land costs and potential inadequacies in the funding regime for RES are joined by general build costs as another barrier to affordable housing delivery on RES. Small housing schemes do not achieve the economies of scale associated with larger projects. Fewer builders and contractors operating in rural areas may act to reduce competition and drive up cost, especially if material and labour has to be brought in from further afield (Satsangi et al, 2010). Once land prices are added in, the differential between urban and rural housing prices grows. If London is excluded, house prices (and underlying land prices) are between 26% (LGA, 2017) and 37% (Baxter and Murphy, 2018) higher in rural than in urban areas. Higher development costs reduce what is attainable from Section 106 agreements on larger housing sites, as the viability of

carrying larger planning gains is diminished. Those costs are currently rising rapidly. The Covid-19 pandemic is known to have caused some decentralisation of housing choices in England: the search for additional space and changing working patterns have resulted in a portion of urban families relocating to smaller towns and villages. This has driven up house and land prices. Then, during the tail-end of the pandemic, various global disruptions to supply chains have triggered an inflationary cycle that central banks are trying to get to grips with by raising interest rates. Labour, material and finance costs are being pushed up in this inflationary environment, causing rapid rises in procurement costs for social and market housing providers. As well as creating a hostile environment for residential development in general, these pressures have a disproportionate impact on small sites, including RES, that are not able to capture economies of scale.

First homes exceptions

A1.27 An emerging issue, which could further disrupt the delivery of affordable homes on RES is government's 'first homes exceptions' mechanism now set out in NPPF. First Homes Exceptions, led by landowners and their development partners, can provide discounted sale homes, targeted at first-time buyers, on exceptions sites in rural areas that are not 'designated' under Section 157 of the Housing Act 1985 (so excluding National Parks and AONBs, for example). Fewer than 40% of all rural parishes in England are designated, meaning that traditional RES, focused on delivering social rented housing, could be undermined by the land price expectation associated with discount-sale RES (i.e. first homes) in nearly two-thirds of rural England.

A1.28 Work by Lavis for the Rural Services Network (Lavis, 2022) suggests that first homes may not be affordable to key target groups in many rural areas (proposed discount levels would not be affordable given local wage levels); the policy will drive down the supply of affordable rented housing that communities need; and government should carefully monitor the impact of first homes exceptions on RES. RES support affordable housing delivery by establishing a new 'best use' for land short of full market development. Where first homes exceptions are permitted, discounted market sale will be the new best use, meaning that social rented housing will not be viable because of rising land price expectation. Government claims that RES sites are difficult to 'unlock' because of the requirement for community support and finding a landowner who is willing to sell land at a price closer to agricultural value than full residential value, and who is not distracted by the prospect of achieving a higher land price at a future date.

'Unlocking' happens, in government's reckoning, only where land price moves closer to full development value and where the onus on evidencing (a specific kind of) need is removed. In other words, private (landowning and development) interests, rather than community interests need to be in the driving seat.

The resourcing of local planning

A1.29 We now turn to the second focus of this review: resourcing the planning function in local authorities in England, in support of RES delivery.

The general state of (public) planning resourcing

A1.30 A study by the RTPI in 2019 showed that across 335 planning authorities, investment in the local planning service had fallen by 42% in real terms in the previous decade (Kenny, 2019). The study went on to argue that planning was underperforming against its huge potential: investment in the planning service would enable authorities to capture the value of land development more effectively, thereby supporting the delivery of infrastructure and affordable homes and reducing government expenditure in areas such as housing benefit. It argued that growth, per se, can benefit society at large if public services are fit for purpose and can facilitate development is such a way as to maximise public benefit. Without a good planning service, such benefits are lost and the overall quality of development diminished. Planning therefore enters a spiral of decline, being denigrated for the poor service and the poor outcomes which should in fact be attributed to under-resourcing.

A1.31 Against this backcloth of spending cuts, local planning services have tended to retrench into those statutory obligations, such as everyday development management, that bring in direct fees. Strategic functions are neglected, hence the gap in local plan production noted above (i.e. a quarter of authorities have no plan and, where plans are in place, a third are more than 5 years old). It is these strategic functions that frame RES policies, ensuring that those policies are evidenced, sufficiently clear, flexible, and up-to-date, and therefore provide local partners with the support needed to deliver affordable homes 'off plan'.

A1.32 The RTPI study quantified the national shortfall in funding. It calculated that an additional £442 million needed to be spent on staffing and key activities (including

working with partners on identifying the best sites for housing development, and promoting active place-making to ensure the level of housing and place quality needed to build public support for development) in support of government's (then) target of facilitating the delivery of 300,000 homes in England each year.

A1.33 The RTPI is a professional membership body that exists to advance the art and science of town planning, and advocate the interests of public planning. Many of its members work in the private sector, often having moved from public practice. However, its priority is building capacity within local government ('planning as a public service') rather than advocating for the expansion of broader cross-sector capacity, which might alleviate pressure on local authorities.

Wider capacity issues

A1.34 There has been some focus on plugging the resource gap in rural areas. Declining planning capacity in the local authority sector might be compensated by the creation of regional rural planning hubs (Baxter and Murphy, 2018) that pool expertise and capacity and provide a support service for local authorities. It has also been suggested that rural housing enablers have a critical role to play in adding capacity to beleaguered planning authorities, although these are not immune from underfunding. Webb et al (2019) have drawn attention to their dwindling numbers in Wales and similar cuts in England have reduced the capacity of local authorities and voluntary networks, i.e. ACRE, to provide an enabling service.

Impacts

A1.35 How planning resourcing affects rural housing delivery is an under-researched area. Logic suggests that planning authorities will be inclined to focus resources on the biggest sources of planning fees and planning gains, therefore prioritising larger strategic projects at the expense of smaller schemes. The CLA has noted a tendency to refocus on projects in larger settlements: it is claimed that these are more sustainable, although housing market pressures appear to be shifting to smaller settlements post-pandemic, suggesting that more effort might be expended on supporting the delivery of new housing in such locations. Whether planning resourcing is a factor in limiting the rural focus is not clear (CLA, 2022).

A1.36 What is much more clear is the impact that resourcing is having on public sector

workloads and morale. A recent survey by RTPI Cymru focused on the wellbeing of planners in Wales (which is likely to mirror the situation in England given the similar level of recent resource cuts) reported that 21% of planners feel 'stretched all of the time', with a higher proportion noting unmanageable workloads 'some of the time'. High post vacancy rates across local authorities saw some planners fulfilling non-planning functions. A potential to work more smartly using digital technologies was being hampered by a lack of investment in training and in essential digital resources. The upshot was that the planning service suffered, applications could not be turned around in required timeframes (RTPI, 2023), and planning officers faced frustration and abuse from service users – particularly from members of the public. The evidence of stress in the planning service has been building over recent years (see also RTPI, 2018) but seems now to be coming to a head. There was significant frustration at the RTPI General Assembly, where the RTPI Cymru survey was first reported in January 2023, with many members attributing the abuse targeted at planners not only to underfunding but also to the denigration of planners and planning by the UK government over several years.

A1.37 It is claimed, in some quarters, that 'low morale' in the planning profession, and particularly in local authorities, is a consequence of austerity and government's neo-liberal market logic. That neo-liberal logic, it is argued, lays blame for England's broader housing crisis at the door of planners, who are painted as 'bureaucrats' acting to limit the market's capacity to deliver the new homes that the country needs. An alternate view is that planning exists to facilitate the conversations, between critical partners, and the investments, including in key infrastructure, needed to enable development. Research has revealed that social and private housing providers regularly agree on the critical importance of a well-resourced planning service in supporting development, upholding the public interest, and helping deliver more equitable and sustainable development outcomes (Gallent et al, 2019).

A1.38 However, where planning is asked to do more – including navigating increasing layers of environmental regulation, relating to net-zero or nutrient neutrality for example – resource tensions become even more pressing. This appears to be the situation in England: a hard-pressed planning service being asked to do more with less, with implications for both the general service and for RES, which are investigated at the survey stage of this project.

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Summary

A1.39 Conversations with Steering Group members have highlighted the factors that support or stall RES schemes. They have also drawn attention to the nature of the resource constraints affecting local planning authorities, the impacts of those constraints, and potential mitigations. This review of available literature and recent studies, which has inevitably omitted some works, adds further insights into the issues being investigated in this research. The factors affecting the progression of RES schemes, flagged in the literature, are tabulated below. Literature on planning resourcing has tended to focus on the funding crisis afflicting local authorities. It calls for further investment in planning rather than showcasing the ways that authorities might live with austerity, through sharing resources, subcontracting, or relying on other actors to voluntarily support the planning function. Because much of the work on resourcing has been undertaken by the RTPI, there is a significant focus on defending the profession and securing additional money. This project will explore mitigation strategies at the survey stage.

Table A1: Factors including resourcing affecting RES, from literature

Community engagement and support	Getting the community on board by winning the argument that affordable housing is key to economic and community vitality is a prerequisite for RES success
Land cost	Rising land costs (and landowner expectations) are a barrier to RES, but working with landowners to secure land at the right price is critical to success
Community governance and parish councils	Governance structures, and particularly parish councils, bring together critical interests. This is where the case for affordable housing is won, and where landowners interface with communities
Rural housing enablers	Success can hinge on the work of housing enablers, their store of knowledge and experience, and their capacity to be honest brokers and maintain the momentum of RES projects
Effective partnerships	Partners have different motivations and roles in the RES process. The ambition of community activism can grate against normative systems, of planning and finance. Effective partnerships are supportive of different interests and manage expectations

The policy framework	The policy framework extends from national policy to local plans. The former need to be stable and give certainty to local projects. Plans need to have clear but flexible policies that support RES in different situations
The funding regime	Access to funding is critical to RES success. This frequently means accessing Homes England grants. RPs have a critical role to play in securing funding and finance for RES, through their access to grants and through their ability to secure loans. Local authorities are also key funders, using a mix of borrowing, Section 106 revenues, and capital receipts.
Build costs	Build costs can undermine the 'value for money' (and viability) that RPs seek from RES schemes. The current inflationary environment is particularly challenging for small schemes, which are unable to capture economies of scale. Development in rural areas is more costly than building in towns and cities
First homes exceptions	RES work by securing land at a price that will support the affordability of homes built. Land price is determined by best permissible use. If 'first homes' become best permissible use, RPs and their partners will struggle to access land at a price that supports the delivery of rented homes
Resourcing for local planning services	A quarter of planning authorities in England have no local plan and a third of plans that are in place are out of date. Central funding to planning has dropped by more than 40%. Planning teams are afflicted by high workloads and low morale. This is impacting the strategic functions of authorities, including plan making, and leading to longer turnaround times for applications. Resource cuts have been concomitant with the laying of new duties on planning authorities.

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Appendix 2: Questions for interviews with Steering Group members

1:1 Steering Group Conversations – Briefing Note

The purpose of these meetings with Steering Group members is to establish a knowledge base-line, drawing on insights from within the group.

The project asks one general question

A) What underpins success in the delivery of RES?

This one general question is unpacked into three more specific questions:

B) How does LA resourcing of the planning function affect the success of RES?
C) How can LAs mitigate resource shortcomings through local working practices and innovations?
D) Besides planning resourcing, what other factors/practices/policies underpin successful RES schemes?

The research we are undertaking to answer these questions comprises:

A) A review of existing published research
B) Baselining conversations with Steering Group members
C) Collation of publicly available data for rural planning authorities, on RES delivery and planning performance for last 5 years
D) Survey of rural planning authorities, requesting self-assessment of nature of resource constraints, impacts of constraints (for broader planning function and for RES or small rural site delivery), and mitigation strategies
E) Case studies of 6 rural authorities with strong track-records of RES delivery

Themes to be explored in 1:1 Steering Group member conversations, which are general in their scope

A) What has to 'go right' for a RES to be successful? (e.g. evidence of need; community support/effective community liaison; enabling; willing landowner; RP partner; clear and

proactive planning policy; stamina among key partners; trust; etc.)

B) What 'goes wrong' where a RES fails or where a RES is not feasible?

C) What resource constraints are faced by rural planning authorities?

D) What impacts do these have, on the planning service or housing delivery in general, or on RES more specifically?

E) How are rural authorities mitigating those constraints?

Appendix 3: Survey Questionnaire

Research on the impact of planning resourcing on the delivery of rural housing projects

Researchers based at University College London have been commissioned by the Rural Housing Network to assess the impacts of local planning authority resource constraints on the delivery of smaller rural housing projects.

We are undertaking an on-line survey of senior or lead planning officers, from which we are seeking 'self-assessments' of the following three issues:

1. The nature and severity of resource constraints – with resources defined as the workforce and skills needed to delivery against core planning duties;

2. The impacts resource constraints on the planning service, and on rural projects in particular;

3. How constraints are being mitigated, or options for future mitigation.

Most of the questions require tick-box responses. There are also opportunities to explain or expand upon responses.

The survey will aggregate responses to questions and no individual local planning authorities will be identified. All responses will be treated as confidential.

1. Do you consent to completing this survey? The Participant Information Sheet for this Survey has been attached to the email invitation to complete this survey. *

Yes / No

2. What is your role/job title? Please indicate any areas of previous experience, if not covered by your current position. *

3. Which local authority do you work for? * Enter your answer

4. For how many years have you worked in this local planning authority? (number) *

5. For how many years have you worked in the planning sector, in either the public or

private sectors, in total? (numerical response) *

6. How many team members work in your planning department, in all grades and functional roles (DM, policy, Local Plan etc.)? (numerical response). *

7. How many posts are currently vacant and waiting to be filled? (numerical response) *

8. Further comments concerning staffing levels:

Part 1: The nature and severity of resource constraints

9. Please rate your level of agreement with the statement (if you feel the question is not relevant to you, please ignore the question): This local planning authority has the resources (workforce and skills) it needs to fulfil **all statutory duties** within required timescales (including, but not limited to: maintaining an updated Local Plan, turning around major and non-major applications, pursuing timely enforcement action)

10. This local planning authority has the resources (workforce and skills) it needs to **engage informally with communities and development partners** (including, but not limited to: engaging with informal enquiries, engaging in pre-app discussion, informal partnership working) (Rate 1-5, or ignore)

11. Please add any further comments in respect of questions 9 & 10, as you feel are appropriate including any reference to particular departments and functions within the Planning Authority, or with external development partners.

12. In your opinion, to what degree of pressure are Planning Officers working under (Rate 1-5, or ignore)

13. Staff turnover has increased over the last five years (Rate 1-5, or ignore)

14. Morale amongst planning officers in this local planning authority is good (Rate 1-5, or ignore)

15. The local planning authority struggles to recruit new planning officers (Rate 1-5, or ignore)

16. It is difficult to retain experienced planning officers (Rate 1-5, or ignore)

17. The planning team possesses the full range of experience needed to deliver an effective planning service (Rate 1-5, or ignore)

18. Please indicate what areas of experience your department is lacking (if any)

19. The planning team possesses the full range of expertise needed to deliver an effective planning service (Rate 1-5, or ignore)

20. Please indicate what areas of expertise your department is lacking (if any)

21. A widening list of duties and responsibilities is increasing the pressure on planning teams (Rate 1-5, or ignore)

22. Please explain your response to question 21

23. Higher levels of home-working since the Covid-19 pandemic has increased efficiency

within the planning service in this local authority (Rate 1-5, or ignore)

24. Please explain your response to question 23

Part 2: The impacts of resource constraints (General Service Impacts)

25. Please rate your level of agreement with the following prepared statements (if you feel the question is not relevant to you, please ignore the question): The planning service in this LPA has the necessary resource to deliver services at the quality and/or speed expected of it. (Rate 1- 5, or ignore)

26. The local planning authority turns around all applications within statutory time limits (Rate 1-5, or ignore)

27. The local planning authority often needs to agree time extensions for application turn-around (Rate 1-5, or ignore)

28. The local planning authority has the resources it needs to build the evidence base for its Local Plan (Rate 1-5, or ignore)

29. The local planning authority has the resources it needs to update its Local Plan when necessary (Rate 1-5, or ignore)

30. The local planning authority has the technical skills needed to deal with responsibilities around net-zero, nutrient neutrality, etc. (Rate 1-5, or ignore)

31. Please add any additional comments

Part 3: The Impacts of resource constraints: (Rural Housing Impacts)

32. Do you have a RES policy that is less than 5 years old? Yes /No

33. On average how many RES scheme proposals (not planning applications) are you involved with per annum?

34. The local planning authority has the resources it needs to work with partners on developing the evidence required to support rural housing projects, including on Rural Exception Sites (Rate 1-5, or ignore)

35. The local planning authority has the resources it needs to engage informally (before pre-app) with Registered Providers on the potential of small housing sites (Rate 1-5, or ignore)

36. There is a tendency for our authority to focus on strategic priorities, including larger housing sites due to resource constraints (Rate 1-5, or ignore)

37. The local planning authority provides consistent, long term support to the delivery of RES, as can be demonstrated by the level of delivery in our area over the last ten years (Rate 1-5, or ignore)

38. The local planning authority is able to work effectively with key external partners on Rural Exception Sites, such as landowners (Rate 1-5, or ignore).

39. Communities (question as above)

40. And Registered Providers (question as above)

41. The local authority planning department is able to work effectively with other internal departments, and key external partners on Rural Exception Sites, including the Highways Agency and Environment Agency (if applicable) (Rate 1-5, or ignore).

42. Please add any additional comments

Part 3: Mitigation of resource constraints

43. Do you work with a Rural Housing Enabler: Yes - Internal Yes - External No

44/ Please rate your level of agreement with the following prepared statements (if you feel the question is not relevant to you, (not working with a rural housing enabler) please ignore the question): Directing resources to Rural Housing Enablers (RHE), within or out- with the local authority, is an effective means of supporting rural housing delivery.

45. Do you outsource any planning services? If so, which services. If not, please state no...

46. Outsourcing planning services to consultants improves service delivery (Rate 1-5, or ignore) 47.Outsourcing planning services to consultants is cost efficient (Rate 1-5, or ignore)

48. Local planning authority capacity can be enhanced through centrally-provided training (Rate 1-5, or ignore)

49. If you agree with the last question, what sort of training would you recommend?

50. Local planning authority capacity can be enhanced through the systematic sharing of best practice (Rate 1-5, or ignore)

51. The informal (ad hoc and occasional) sharing of staff between local planning authorities is an effective means of mitigating resource constraints (Rate 1-5, or ignore)

52. If you agree with the last question, what skills are being shared? Which skills are most useful or relevant to rural delivery. Please add your comments whether this is ad hoc or formal (the next question refers).

53. The formal sharing of staff, via 'shared service' arrangements, between planning authorities is an effective means of mitigating resource constraints

54. Regular changes to the national planning system may accentuate the challenges centred on local planning resourcing (Rate 1-5, or ignore)

55. The recruitment of junior staff on degree apprenticeships could help rebuild local planning resources (Rate 1-5, or ignore)

56. Local planning authorities are able to mitigate the impacts of centrally-imposed resource constraints by changing their working practices, partnering with others, and

making less go further (Rate 1-5, or ignore)

57. Please indicate if your authority has engaged in any of the following mitigations (tick all that apply).

- *Engagement of an in-house rural housing enabler*
- *Engagement with an external rural housing enabler*
- *Outsourcing planning services to an external consultant/provider Sharing best practice between local authorities*
- *Informal sharing of staff*
- *Formal 'shared service' arrangement*
- *Supporting junior planning staff on degree apprenticeships*

58. Please specify 'other' mitigations from question 57 (if any)

59. What are the immediate resourcing priorities (e.g. staffing or skills/capabilities) for this local planning authority)?

60. What are the resourcing priorities (e.g. staffing or skills / capabilities) for this local planning authority over the next 5 to 10 years?

61. We welcome any general comments you have on the nature of resource constraints affecting local planning authorities, their impacts, and their potential mitigations

Appendix 4: Corporate level questions
Policy Level (corporate approach to RES) – Questions

The UCL team will be conducting interviews with 5 individuals or organizations for this case study. Some interviews are at the 'Policy Level', exploring an area's corporate approach to RES, and others are at a 'Project Level', seeking to understand the impact that the area's approach has on how affordable housing on RES is delivered.

1. For how long has [name authority] been delivering affordable homes on RES? LA returns show that [n] affordable homes were delivered on RES in last five years. Across how many sites did that delivery occur?
2. What are the **strategic features** of the approach towards RES taken in [name authority]? (Prompt on the aspects listed below).

- *Political and/or corporate emphasis on rural housing;*
- *Approach to evidence gathering (e.g. who leads and authority involvement);*
- *Approach to site search and selection (e.g. whether strategic);*
- *Approach to cross-subsidy (prompt on the balance of tenures achieved and proportion of social rented / prompt on land price policies linked to cross-subsidy / prompt on grant funding from different sources);*

- *Approach to supporting and working with rural housing enablers;*
- *Approach to other strategic partnerships (prompt on presence of 'Rural Housing Partnerships'/'RHE Steering groups' – their membership and effectiveness)*
- *Other policy or practice innovations*

3. What **impediments or challenges**, if any, have you encountered in the delivery of affordable homes on RES?

4. How have these been overcome?

5. Does [name authority] have the **resources** needed to facilitate RES and work effectively with partners?

6. In terms of delivering RES, what has **worked well** in [name authority]? What lessons would you highlight for other parts of the country?

7. How do you see your approach to RES **evolving** in the future (and to what extent do you see CLTs being part of your success)?

8. Is there anything else that the local authority is doing to support the delivery of affordable housing?

9. Do you foresee any **risks on the horizon**, or any difficulties (arising from changing policy or other contextual factors), that may impact on the delivery of affordable homes in RES?

Appendix 5: Project level questions
Project Level – Questions

The UCL team will be conducting interviews with 5 individuals or organizations for this case study. Some interviews are at the 'Policy Level', exploring an area's corporate approach to RES, and others are at a 'Project Level', seeking to understand the impact that the area's approach has on how affordable housing on RES is delivered.

[Team note: prompts derive from baselining stage and the Policy Level interviews for this case study/seek basic information on number and mix of homes in advance]

1. Please tell us about the origins and inception of this project? How did it come about? Who were the key leaders / stakeholders?
2. Please reflect briefly on these stages/factors affecting RES? What involvement did local authority officers have in these stages, where applicable? Were any of the stages problematic? If they were, how did you address them?

- Evidencing the need for affordable homes;
- Building community support (was this centred on the Parish Council?);
- Partnering with landowners (including offering incentives), identifying sites, and accessing affordable land (prompt on land price);
- Building costs and procurement;
- Working with a Rural Housing Enabler;
- Maintaining momentum and enthusiasm (who took responsibility for this?);
- Finding a Registered Provider and accessing grant support, if applicable;
- Working with the planning team (clarity of policy and consistency of support, including at the pre-app stage);
- Support from the planning team (their capacity to dedicate time to the RES).

1. Policy level interviews drew attention to the importance of the following when delivering RES in [name authority] [Highlight those of the following that apply **BEFORE** project-level interview]

2. Policy level interviews drew attention to the importance of the following when delivering RES in [name authority] [Highlight those of the following that apply BEFORE project-level interview]

- Political and/or corporate emphasis on rural housing;
- Special approach to evidence gathering;
- Special approach to site search and selection;
- Special approach to cross-subsidy;
- Special approach to working with RPs;
- Special approach to supporting and working with rural housing enablers;
- Special Approach to other strategic partnerships, e.g. 'Rural Housing Partnerships'/'RHE Steering groups'
- Support for and role of CLTs;
- Other policy or practice innovations
  Please describe the significance of this / these to the delivery of affordable housing during   this project.

3. What was the key learning from this project: practices that should be repeated in future projects or mainstreamed to other jurisdictions?

Appendix 6: Case Study Interviews Conducted

Case Study	Policy Level Interviews	Project Level Interviews
Cornwall	Planning Policy Manager; interviewed 19 August 2023	Senior Project Lead, Market Garden, Veryan; interviewed 22 June 2023
	Principal Rural Housing Enabler & Affordable Housing Manager; interviewed 8 June 2023	Former co-leader, Cornwall County Council / Ward Councillor, Veryan; interviewed 11 June 2023
	Principal Housing Strategy Officer; interviewed 18 June 2023	Tenant Relations and Allocations Manager; interviewed 2 August 2023
Shropshire	Housing Enabling Officer 1; interviewed 24 May 2023	Housing Association (SRHA) CEO; interviewed 9 August 2023
	Housing Enabling Officer 2; interviewed 1 June 2023	
Derbyshire Dales	DM Policy Manager; interviewed 19 May 2023	Taddington Parish Councillor / NPA Member; interviewed 6 June 2023
	Housing Manager; interviewed 22 May 2023	PDRHA Board Member / former NPA Policy Officer; interview conducted 26 June 2023
	Peak District NPA Officer; interviewed 5 June 2023	
Winchester	Head of Planning; interviewed 9 June 2023	Developer, RES; interviewed 11 August 2023
	New Homes Strategy and Development Manager; interviewed 23 May 2023	Housing Development Officer; interviewed 19 May 2023
North Norfolk	Planning Team Leader & Community Housing Enabler; interviewed 9 June 2023	Development Director, Broadland Housing Association; interviewed 11 June 2023
	Housing Strategy & Delivery Manager Development Manager; interviewed 7 June 2023	Planning Consultant (led application for 5 linked projects); interview conducted 21 July 2023
		Parish Council Chair; interviewed 19 July 2023

North Yorkshire	Planning Leads at East Ryding (2); interviewed 21 June 2023	NA
	Housing Strategy Manager (YNYER); interviewed 3 July 2023	NA
	RHE at East Ryding; interviewed 12 June 2023	NA
	Yorkshire Dales NPA, lead officer; interviewed 20 June 2023	NA
	North Yorkshire Moors NPA, lead officer; interviewed 22 June 2023	NA