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29th August 2025

Dear Mr. Howard

LAND ON THE SOUTH SIDE OF COWARDS LANE, CODICOTE
APPLICATION REFERENCE: 25/01766/OP

We write on behalf of the Applicant in respect of the consultation response from the Housing Supply officer on the 11th August 2025. We address each of the points in turn albeit we note the first two pages are citation of policy and the comments do not commence until midway through page 3 and focus on two areas:

1. It is said that the Application is proposing 50% affordable housing with 10 social rent and 5 for affordable home ownership.

Response: Whilst it is correct that 50% affordable housing is required; the tenure split is a matter for discussion between the two parties.

2. The registered providers for the three sites already under construction are struggling to find applicants with a local connection for the shared ownership homes and therefore all affordable homes must be for social rent to meet housing needs if the application can be justified and approved.

Response: The Applicant has spoken with both local developers who are building out 2 of the 3 sites in Codicote. In addition, the Applicant's have also spoken with the Housing Associations who have entered into contracts with the developers on said schemes. All 4 parties have confirmed that any issues in respect of disposal of Shared Ownership homes have been caused by the Council's requirement for the Shared Ownership properties to have a local connection criteria (within Codicote). At the end of the restricted period when they were able to offer the homes across the whole of the District – then the homes were taken up quickly. Furthermore, both

Housing Associations, as referred to above, have confirmed that they are very much in need of more Shared Ownership properties in the District.

The application is not submitted on the basis of meeting housing need in Codicote – it is clearly framed around meeting District wide housing need and this applies equally to the affordable housing. On this basis, the Applicant does not support the inclusion of a local connection criteria which would restrict the disposal of the Shared Ownership homes in the face of two Housing Associations expressing a need for such homes. Given that this is a development of only 30 homes – a year long restriction would create significant delivery problems for the site given that all homes could be constructed within a year and the development completed.

This principle of a local connection was discussed recently at an appeal in North Somerset – Rectory Farm, Yatton¹. Paragraphs 129 – 131 deal with this matter as below – relevant sections are emphasised:

129. The Agreement sets out alternative criteria for determining who would qualify to be an applicant for the affordable housing. Under the first option the applicants would be people who have a local connection to the district of North Somerset as defined in the Council's nomination policy. Under the second option, the applicants would be people who live in the parish of Yatton, or are connected to it by work or family, subject to a cascade provision if no such people are found.

130. The Agreement is drafted such that the first option will apply unless this decision states that the second option should apply instead. I conclude that the second option should not apply because there is no sound evidence base to justify any particular level of affordable housing need in Yatton. The second option would not accord with Regulation 122 of the CIL Regulations because it would not be necessary. Moreover, it could well be counter-productive in terms of meeting priority housing needs. It could result in housing being allocated to persons with a local connection, but a lower level of housing need, thereby displacing persons without a local connection with a higher level of housing need.

131. That said, there is a pressing district-wide need for affordable housing. The district wide need will include some

¹ Appeal Reference: APP/D0121/W/24/3343144 - [Reference: APP/D0121/W/24/3343144](#)

households who either live in Yatton or have a local connection to it. Meeting that need is an important objective of both the Framework and the NSCS. The proposal would provide 50% affordable housing, which is in excess of the minimum level set out in Policy CS16. Drawing all this together, I attach substantial weight to the delivery of up to 95 units of affordable housing.

We consider that the same principles can be applied here and that the use of a local connection criteria could deny those in greater housing need access to a home in place of those with a lesser housing need but a local connection.

The remaining points in the letter are all related to reserved matter items i.e. design / parking / use of national space standards. We note that there is reference to issues of viability at the end of the letter – it is not clear why this is included as the Applicant proposes 50% affordable housing rather than seeking a reduction in provision.

We note therefore that as a matter of principle, the inclusion of 50% affordable housing is supported, and the issue relates to the tenure split / local connection criteria. For the reasons which are set out in this letter and backed up by discussions by those currently delivering affordable housing in Codicote, the provision of 100% social rent and/or a local connection is not supported and we would be grateful if this matter could be further reviewed.

As a final matter – we note that previously a request has been made for details of the housing mix for the site (both market and affordable). However this is an outline application and the housing mix does not form part of this application and is not a matter for consideration at this time.

We trust that the above demonstrates the need for a flexible approach to tenure and eligibility criteria. We are happy to meet to discuss this further if required. In the meantime, if you have any queries, please do not hesitate to contact me.

Yours sincerely,



Kathryn Ventham
Senior Director

cc Hawridge Strategic Land Ltd.