

# Local Housing Need Report

In respect of:

**Yatton Parish**

Prepared by:

**Pioneer Property Services Ltd**

On behalf of:

**Persimmon Homes  
(Severn Valley) Ltd**

Date:

**19<sup>th</sup> March 2024**



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## EXECUTIVE SUMMARY

### Introduction and Overview

- i. In support of a planning application for 190 new homes at Yatton, North Somerset Pioneer Property Services Limited (“Pioneer”) has undertaken a review of market and affordable housing need (in terms of quantum, tenure and mix) within the Parish of Yatton on behalf of Persimmon Homes (Severn Valley) Limited. The report identifies that the proposals contribute positively to the identified overall housing need in Yatton Parish.

### *Housing Quantum*

- ii. Significant uncertainty regarding the progress, timing and overall soundness of the emerging Local Plan could substantially undermine the overall supply of market and affordable housing proposed between 2024 and 2039 that can be delivered.
- iii. There is a pressing need for the overall housing requirement to be increased beyond the 321 (inclusive of c.90 windfall homes) proposed by the emerging Local Plan within Yatton Parish between 2024 and 2039.
- iv. Based on analysis undertaken by Pioneer the requirement in Yatton Parish for market housing is suggested to be c.2.6 times the supply planned through the emerging Local Plan and a shortfall of c.399 market homes could accrue in Yatton Parish unless additional supply sources are identified over the 2024 to 2039 period.
- v. If overall housing supply remains at the level proposed through the emerging Local Plan significant shortfalls of up to 565 Affordable Homes could accrue in Yatton Parish 2024 to 2039.
- vi. Even if Affordable Housing need is constrained to exclude a significant number of households eligible for Affordable Home Ownership (“AHO”), at a minimum shortfalls of c.99 Affordable Homes could accrue. Existing backlogs in unmet Affordable Housing need suggest this lower shortfall scenario to be an optimistic outcome with c.985 households waiting for Affordable Housing selecting Yatton Parish as a location in which they would accept a home.
- vii. The latest 2022 Mid-year population estimates suggest population increases at a local authority level and Parish level between 2021 and 2022 which are likely to result in

increases, as opposed to decreases, in projected households / housing demand particularly in Yatton Parish which is suggested to have seen increases between 2021 and 2022 significantly in excess of those across North Somerset.

### *Housing Mix*

- viii. The existing characteristics of owner occupier housing in Yatton Parish suggest that the primary focus for additional market housing should be on providing 3 bedroom family housing whilst also increasing the proportion of entry level market homes - this approach will improve the availability of both entry level and family housing and therefore contribute towards meeting the need for homes in Yatton Parish.
- ix. Affordable Housing need (current unmet and projected) suggests that provision in Yatton Parish should primarily be focused on the provision of 1 and 2 bedroom homes alongside a remaining element of 3 bedroom or larger family homes.

### *Affordable Housing Tenure*

- x. LHNA23 North Somerset level outputs suggest that Affordable Housing should include a significant proportion of AHO. In view of: increased affordability challenges faced by eligible households aspiring to home ownership within Yatton Parish compared to North Somerset; the constrained availability of existing AHO housing stock (both in the Parish and in North Somerset) and the demographic similarities between the Parish and the wider local authority area the LHNA23 tenure split range (i.e. between 27% excluding a significant number of households eligible for AHO and up to 68% including all households aspiring to AHO) can reasonably be applied in Yatton Parish.

### *Location Context*

- xi. Yatton Parish is suggested to be similar demographically (in terms of household composition and age) to North Somerset as a whole.
- xii. As at the 2021 Census Affordable Housing is recorded to comprise only c.10% of the overall housing stock in both North Somerset and Yatton Parish and 11% of the Affordable Housing within Yatton Parish (i.e. just 46 homes) is comprised of Affordable Home Ownership.

- xiii. **Affordability is more challenging within Yatton than in North Somerset on average, with a median house price to income ratio (at 12.5) exceeding that for North Somerset (at c.10) and for England (at 8.3).**

### **Policy Context**

- xiv. **The delivery of housing is a material consideration of significant importance; the National Planning Policy Framework (“NPPF”) includes the clear objective of ‘significantly boosting the supply of homes’ and the ‘minimum number of homes needed’ should be informed by a local housing need assessment using the Standard Method unless exceptional circumstances apply.**
- xv. **National Planning Policy and Guidance, as acknowledged in the North Somerset Local Housing Needs Assessment Report of Findings (October 2023) (“LHNA23”), includes all households able to afford market rents but aspiring to home ownership and unable to afford to buy as eligible for Affordable Housing. Further affordability testing is not required in the NPPF / NPPG to derive the overall need for Affordable Home Ownership (“AHO”).**
- xvi. **Extant Plan Core Strategy policy in North Somerset defines Yatton as a Service Village alongside other settlements which are to receive 2,100 homes. Core Strategy policy targets the delivery of only 150 Affordable homes per annum for North Somerset (c.14% of the overall 1049 planned housing supply).**
- xvii. **Council published Housing Land Supply data in March 2023 for the 2022 to 2027 period acknowledges a 3.5 year supply – reflecting a failing to address overall local housing need across North Somerset and within Yatton Parish.**
- xviii. **Yatton Neighbourhood Plan (“NHP”) allocates a single site for residential development and does not contain policies specifically in respect of Affordable Housing provision.**
- xix. **The Pre-submission (reg 19) Autumn 2023 ‘Local Plan 2039’ plans for ‘a minimum’ of 14,902 homes 2024 to 2039 across North Somerset (albeit increasing to c.1,049 per annum once distributed), of which 3,610 are proposed across the ‘villages and rural area’ within which Yatton Parish lies. In Yatton Parish 231 homes are proposed for allocation (which includes the settlement of Claverham) through emerging Policy LP2 and Schedule 1. The Spatial Strategy and capacity paper (November 2023 – “SSCP”)**

assumes the provision of a further c.90 small site windfall dwellings within Yatton Parish during 2024 to 2039.

- xx. Emerging Policy DP43 seeks 38.5% Affordable Housing on eligible Greenfield sites and 20% on eligible previously developed land (“PDL”). 25% of this Affordable Housing is sought as First Homes, with the remaining 75% split as 90% Social Rent and 10% Shared Ownership, or in a 77% Social Rent and 23% Shared Ownership split where First Homes is not provided.
- xxi. However, 2023 Dixon Searle viability evidence suggests that the Affordable Housing proportions in emerging Policy DP43 are unlikely to be deliverable.

### **Quantum of Housing Required**

- xxii. The North Somerset Local Housing Needs Assessment (October 2023) (“LHNA23”) does not provide sub-local authority area level conclusions on market or Affordable Housing need.
- xxiii. In this regard, not only is the basis of the overall housing planned across different sub-areas within emerging Policies SP08 and LP2 / Schedule 1 of the Local Plan 2039 unclear, but the district-wide and local levels of market and Affordable Housing provision could fall significantly short of requirements.
- xxiv. Demographic projections prepared by Pioneer (reflecting differences in population distribution in terms of age and sex at a sub-area level compared to across the wider local authority area to inform local sub-area level overall housing requirements) suggest a requirement for c.930 homes overall over a 15 year period in Yatton Parish.
- xxv. 2023 Dixon Searle viability evidence suggests that a minimum of c.651 of the 930 projected overall housing need would need to be provided as market housing to enable delivery of Affordable Housing (at 30%).
- xxvi. The viability evidence suggests that c.69 affordable homes (i.e. based on a 321 overall planned supply minus 90 small windfall sites x 30%) could be provided in Yatton Parish during 2024 to 2039. Deducted from the 321 overall planned housing supply this suggests a planned supply of 252 market homes (i.e. 231 minus 69 affordable homes, plus 90 windfall dwellings as market housing) 2024 to 2039 in Yatton Parish.

- xxvii. Taken together, the projected market housing need and planned supply suggests that, unless additional supply sources are identified, the 2024 – 2039 market housing requirement will exceed the planned supply of market housing by almost 2.6 times and a shortfall of c.399 market homes could accrue in Yatton Parish between 2024 and 2039:

**Market Housing Shortfall - Yatton Parish 2024 – 2039**

Parish	Projected Market Housing Required 2024 - 2039	Maximum Overall Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations	Shortfall / Surplus in Market Housing 2024 to 2039	Projected Market Housing Requirement as a % of Planned Market Housing
<b>Yatton</b>	651	252	-399	258%

Source: Pioneer March 2024 (see Sections 4.2 and 4.3 in the main report)

NB: All outputs subject to rounding, a minus figure equals a shortfall

- xxviii. For Affordable Housing need in Yatton Parish, demographic projection based and ‘top-down’ LHNA23 based Affordable Housing need outcomes (the latter assumes that Affordable Housing need arises at a proportionate rate within Yatton Parish as across North Somerset) have been modelled and compared to the supply of c.69 affordable homes that are likely to be provided 2024 to 2039 in the Parish as a result of the overall housing planned through Policy LP2 / Schedule 1.
- xxix. This analysis suggests that if overall planned housing supply remains at the levels proposed through the emerging Local Plan significant shortfalls of up to 565 Affordable Homes could accrue in Yatton Parish 2024 to 2039.
- xxx. Even if Affordable Housing need is constrained (excluding a significant number of households eligible for AHO) at minimum, a significant shortfall will be experienced of c.99 Affordable Homes which could accrue and the overall estimated Affordable Housing need is suggested to equate to c.139% of the likely planned supply of Affordable Housing.

### Affordable Housing Shortfall - Yatton Parish 2024 – 2039

Yatton Parish Affordable Housing Need Analysis Scenario:	Estimated Affordable Housing Need 2024 - 2039	Affordable Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations (which ever is the highest) assuming Dixon Searle Viability Outcomes*	Estimated Re-lets / Re-Sales 2024 - 2039 Based on Past Trends	Potential Shortfall / Surplus in Affordable Housing 2024 to 2039	Estimated Affordable Housing Need as a % of Affordable Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations
<b>Demographic Projection Based</b>	352 to 818	69	183	-99 to -565	139% to 324%
<b>LHNA23 'Top-Down' Based</b>	210 to 481	69	Already Applied	-141 to -412	303% to 694%

Source: Pioneer March 2024 (see Sections 5.1, 5.2 and 5.3 in the main report)

NB: All outputs subject to rounding, a minus figure equals a shortfall \*Assumes 30% Affordable Housing in locations such as Yatton

- xxxii. Existing backlogs in unmet Affordable Housing need (with c.985 households already on the Housing Waiting List and selecting Yatton Parish as a location in which they would accept Affordable Housing) suggest the lower shortfall scenario (c.99 affordable homes) to be an optimistic outcome.

#### Market Housing Mix

- xxxiii. Small changes to underlying assumptions when modelling market housing mix, particularly over a 15 year period, will significantly alter the market housing mix outputs from those within the LHNA23. This lends weight to the reasonable, proactive position that market housing mix should be flexibly applied at a site level.
- xxxiiii. Having regard to the LHNA23 conclusions for North Somerset on market mix (and its assumptions on how older people will occupy their homes) and the existing characteristics of owner occupier housing in Yatton Parish, the primary focus should be on providing 3 bedroom family market housing whilst also increasing the proportion of entry level market homes above the c.15% recorded in the 2021 Census to improve the availability of both entry level and family housing in the Parish.

#### Affordable Housing Mix and Tenure

- xxxv. Housing Waiting List data for North Somerset suggests is a significant backlog of unmet need for one and two bedroom rented Affordable Housing (2,078 households equating to c.83% of the whole waiting list).



- xxxv. Council Parish level Housing Waiting List data in respect of Affordable Housing for rent suggests up to 82% of all selections made by households across Yatton Parish are for one and two bedroom rented Affordable Housing.
- xxxvi. The Affordable Housing mix proportions concluded in Figure 52 of the LHNA23 for North Somerset, particularly in the absence of sub-area level outputs, should be applied flexibly for developers in terms of dwelling size and type at a site level.
- xxxvii. Having regard to housing mix analysis undertaken by Pioneer for Yatton Parish, existing stock profiles and the existing data within the LHNA23 for North Somerset, proposing up to c.80% of additional rented Affordable Housing with one and two bedrooms alongside a remaining proportion of 3 bedroom or larger family homes would be reasonable approach for the delivery of rented Affordable Housing in Yatton Parish.
- xxxviii. For Affordable Home Ownership (“AHO”) to optimise affordability (which is more challenging in Yatton than in North Somerset on average), having regard to preferences generally expressed by Registered Providers and in the context of the profile of existing Affordable Housing stock, providing an AHO mix that includes c.70% 2 bedroom (predominantly houses) and c.30% 3 bedroom houses represents a reasonable approach for AHO delivery in Yatton Parish.
- xxxix. Whilst sub-area outputs are not presented in the LHNA23, location specific data on the tenure of existing Affordable Housing stock suggests Yatton has similarly low levels of AHO to those across North Somerset. In view of the increased affordability challenges faced by households within Yatton Parish and the demographic similarities between North Somerset and Yatton Parish, Affordable housing can reasonably be provided in a similar split to that across the local authority area as a whole i.e. within the range of 27% to 68% AHO with the balance as rented Affordable Housing.

## **1 INTRODUCTION**

- 1.1 This report has been prepared by Pioneer Property Services Ltd (“Pioneer”) on behalf of Persimmon Homes (Severn Valley) Limited to review housing need within the Parish of Yatton. The report accordingly reviews the available evidence to provide a view on the likely need for market and Affordable Housing in terms of quantum, tenure split and dwelling size mix and having regard to planned supply. This report supports a planning application for 190 new homes at Yatton, North Somerset.
- 1.2 The following section provides background context for Yatton Parish having regard to local characteristics in terms of demographics, household composition, tenure and affordability. Section 3 provides an overview of national and local policy / emerging local policy in relation to housing provision.
- 1.3 Section 4 examines the need for market housing in terms of quantum and mix in Yatton Parish having regard to the current Local Housing Needs Assessment evidence base underpinning emerging Local Plan policy, demographic modelling undertaken by Pioneer to project housing need at a sub-area level and planned housing supply. A similar process is undertaken in Section 5 in respect of Affordable Housing. Section 6 provides an overall summary and sets out the conclusions of this report.

## 2 LOCATION CONTEXT

2.1 The primary focus of this report is to examine the likely extent of market and Affordable Housing need within Yatton Parish. The modelling within this report draws on data for Lower Super Output Areas, and where necessary at Ward level, that are the best fit for Yatton Parish.<sup>1</sup>

### Local Characteristics

#### *Population Growth*

**Figure 2.1 – Population Growth 2011 to 2021**

Location	2011 Census	2021 Census	2021 MYE	2022 MYE	Population Increase 2011 – 2021 Census	Population Increase 2021 – 2022 MYE
Yatton	7,552	8,073	9,831	10,097	6.9%	3.3%
North Somerset	<b>202,566</b>	<b>216,727</b>	<b>217,385</b>	<b>219,145</b>	<b>7.0%</b>	<b>0.8%</b>

Source: 2011 and 2021 Census and ONS 2021 and 2022 Mid Year Population Estimates (“MYE”) - ONS Crown Copyright Reserved 2024

2.2 Figure 2.3 suggests that the population across North Somerset has increased c.0.8% 2021 to 2022 (based on 2021 and 2022 Mid-year estimate data) – this is slightly in excess of that over the ten years 2011 to 2021 (at c.0.7% per annum). However, the 2022 mid-year population estimates (“MYE2022”) for Yatton Parish suggest a more significant increase between 2021 and 2022 at 3.3% – this is significantly in excess of that over the ten years 2011 to 2021 (at c.0.7% per annum). MYE2022 data broken down by age and sex is as yet unavailable at a Parish / Lower Super Output Area level – for this reason 2021 Census population data is used to inform the Yatton Parish level housing needs modelling in Sections 4 and 5 below, but the overarching MYE2022 data suggests an increased number of households is likely.

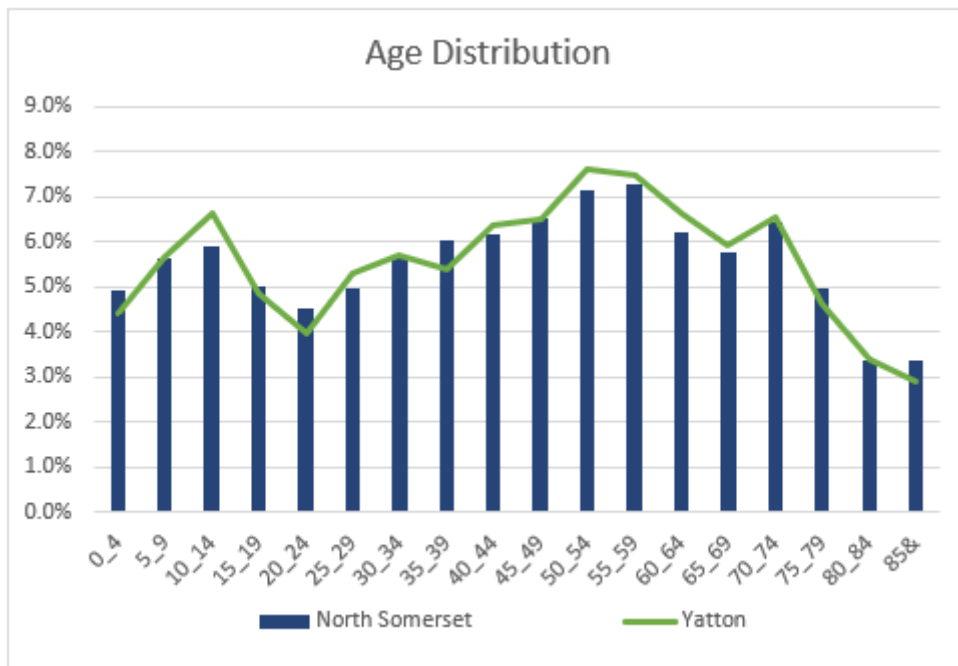
2.3 The above suggests that the proportion of population growth in Yatton Parish has been broadly similar to that across North Somerset during the intercensal period, albeit seeing more rapid growth between 2021 and 2022 based on ONS population estimates. This growth will place increased pressure on the demand for housing in the Parish.

<sup>1</sup> North Somerset 012A, North Somerset 012B, North Somerset 012C, North Somerset 012D, North Somerset 012E, North Somerset 012F. Yatton Ward is the closest comparable area for Yatton Parish in terms of Ward level data.

Age Structure

2.4 The figure below shows the age structure of households across Yatton Parish compared to North Somerset as a whole. This suggests that Yatton broadly aligns with the age structure across North Somerset.

**Figure 2.2 – Age Structure – Yatton Parish and North Somerset**



Source: 2021 Census, ONS Crown Copyright Reserved 2024

2.5 The peak in the proportions of people in Yatton Parish aged 45 to 60 and the fact that c.52% of the population is aged 45+ (similar North Somerset at c.51%) means there is likely to be a demand for additional larger market family housing should owner occupiers in these age groups (and older) choose to stay on in the family home as they age as opposed to downsizing and releasing this type of housing back into the market. The age distribution of the usual resident population suggests a need to provide homes that will attract / retain younger working age people.

*Tenure*

2.6 Across North Somerset and Yatton Parish home ownership is the predominant tenure, although there is a low proportion of private rented accommodation compared to the North Somerset average:

**Figure 2.3 – Tenure by Location**

	Yatton	North Somerset
Owned	79.3%	71.6%
Shared ownership	1.1%	0.7%
Social rented	8.9%	9.2%
Private rented	10.7%	18.4%
Lives rent free	0.0%	0.1%

	Yatton	North Somerset
All Affordable Housing	415	9,393
Shared ownership	11%	7%
Social rented	89%	93%

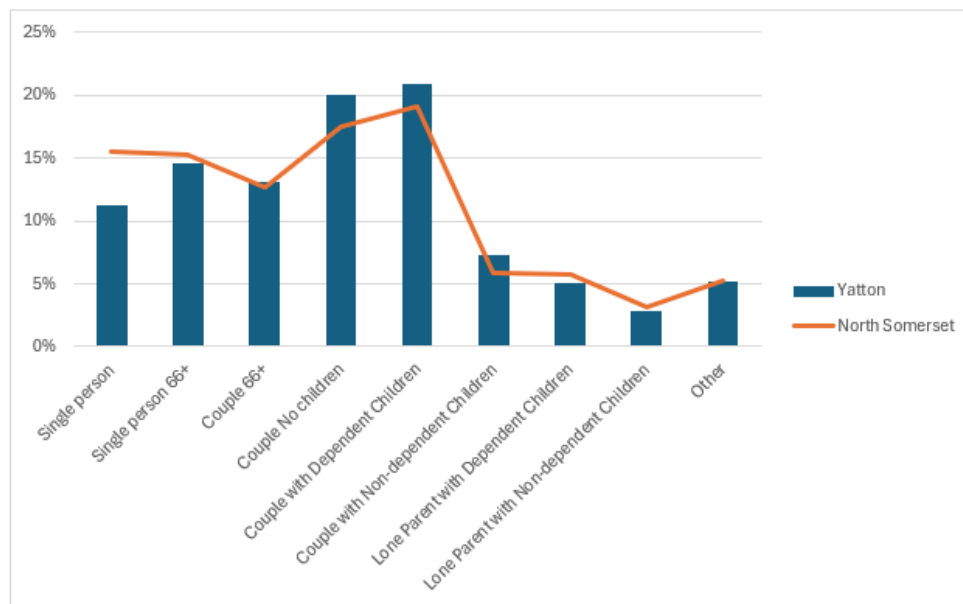
Source: 2021 Census, ONS Crown Copyright Reserved 2024

2.7 Whilst the level of Affordable Housing is low at c.10% of all homes across Yatton Parish / North Somerset, the proportion of Affordable Housing that is available for purchase (c.11% in Yatton and c.7% in North Somerset) is suggested by 2021 Census data to be extremely limited.

*Household Composition*

2.8 A review of household composition data across the Yatton Parish suggests that Yatton has less single person households, but more couples with and without dependent children than the average for North Somerset, although having a broadly similar household composition profile to that across North Somerset in other respects.

**Figure 2.4 – Household Composition – Yatton and North Somerset**



Source: 2021 Census, ONS Crown Copyright Reserved 2024

*Affordability*

2.9 Based on ONS<sup>2</sup> House Price Statistics for administrative geographies (“HPSSA”) as at March 2023 (the latest published data)<sup>3</sup> and Provisional Annual Survey of Hours and Earnings (“ASHE”) data in Table 7.7a as at November 2023 an affordability ratio of 10.04<sup>5</sup> is suggested in North Somerset. This is above the average for England at 8.3 suggested using the same data sources.<sup>6</sup>

2.10 This can be compared to Yatton Ward<sup>7</sup> assuming a median gross annual full time income of £31,963<sup>8</sup> as applicable to North Somerset and based on median house prices at a Ward level<sup>9</sup>:

**Figure 2.5 – Ward and North Somerset Affordability Ratio Ranges**

Location	Median House Price Range	Affordability Ratio Range
Yatton	£399k	12.5
North Somerset	£320k	10.04

Source: HPSSA Dataset 9 March 2023, HPSSA Dataset 37 March 2023, ASHE November 2023, ONS Crown Copyright Reserved 2024

Yatton Ward is subject to greater affordability pressures than across the wider North Somerset local authority area.

<sup>2</sup> Office for National Statistics

<sup>3</sup> Based on Table 2a, HPSSA Dataset 9. Median price paid for administrative geographies, ONS

<sup>4</sup> Earnings and hours worked, place of work by local authority: ASHE Table 7, Tab 7.7a ONS

<sup>5</sup> £320,000 divided by £31,963

<sup>6</sup> Based on a median house price at £290,000 year ending March 2023 (HPSSA Dataset 9. Median price paid for administrative geographies, ONS) and full time median income £35,106 at November 2023 (Earnings and hours worked, place of work by local authority: ASHE Table 7, Tab 7.7a ONS)

<sup>7</sup> Yatton Ward is the area on which this data is based as it is unavailable as a single output at a Parish administrative geography

<sup>8</sup> Earnings and hours worked, place of work by local authority: ASHE Table 7, Tab 7.7a ONS

<sup>9</sup> HPSSA Dataset 37 Table 1a

### **3 POLICY CONTEXT**

#### **3.1 National Policy and Guidance**

3.1.1 The provision of housing (both market and Affordable) as a material consideration in the determination of planning applications remains of vital importance within the current National Planning Policy Framework (“NPPF” – as revised on the 20<sup>th</sup> of December 2023) and accompanying online National Planning Practice Guidance (initially published in March 2014 and updated from time to time (“NPPG”).

3.1.2 Whilst transitional arrangements<sup>10</sup> mean that the emerging North Somerset Local Plan does not fall to be considered under the December 2023 iteration of the NPPF, the current NPPF is a material consideration from the date of publication. Much of the wording in respect of the approach to housing, including Affordable Housing, remains the same in the pre and post December 2023 NPPF.

3.1.3 When providing advice in respect of ‘Achieving Sustainable Development’ the NPPF describes the social role (the second ‘objective’ of sustainable development) as supporting:

*“...strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations;.”<sup>11</sup>*

3.1.4 Development proposals which assist with meeting ‘present’ and ‘future’ housing and affordable housing needs (whilst having regard to the other objectives of national guidance) fulfil this objective.

3.1.5 Paragraph 60 of the NPPF confirms that it remains an objective of national policy to significantly boost housing supply. The needs of different groups in the community ‘should be assessed and reflected in planning policies’ and these groups include those who require Affordable Housing.<sup>12</sup>

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<sup>10</sup> Paragraph 230, NPPF

<sup>11</sup> paragraph 8b, NPPF

<sup>12</sup> Paragraph 62 NPPF Sept 2023, paragraph 63 NPPF Dec 2023



- 3.1.6 The NPPF makes it clear that where a need for Affordable Housing is identified the type of affordable housing required should be set out within planning policies and met on-site unless certain exceptions apply.<sup>13</sup>
- 3.1.7 However, guidance within a ‘Housing needs of different groups’ section of the NPPG, whilst providing broad advice on an assessment methodology for affordable housing need (in line with that provided previously within Government guidance) and vague commentary (albeit without a proposed methodology) on the assessment of private rented, self-build / custom build and student housing, provides no guidance on the methodology or approach to the assessment of types and sizes of housing.
- 3.1.8 Therefore, whilst affordable housing policies should specify the type of affordable housing needed based on the NPPF, it is inherent in national planning policy and guidance (given the lack of direction to the contrary) that any approach to market mix should remain flexible when considering development proposals.
- 3.1.9 The imposition of rigid market mix requirements would have a negative impact on the ability to realise opportunities to contribute towards meeting development needs in the life of a Plan or during the development of a site and would remove the ability to adapt rapidly to changes in market housing demand within specific locations and across local authority areas.
- 3.1.10 Under the NPPF the main responsibility of providing affordable housing falls to major developments (i.e. sites of 10 or more dwellings / 0.5 hectares or more) on which ‘at least 10%’ of the homes overall should be ‘made available’ for affordable home ownership, subject to a limited number of exceptions.<sup>14</sup>
- 3.1.11 The overarching NPPF Annex 2 affordable housing definition confirms that affordable housing is that for sale or rent ‘for those whose needs are not met by the market’. This includes housing for all those eligible for subsidised routes to home ownership. The NPPF affordable housing definition includes Affordable Rent and Shared Ownership as potential affordable housing tenures, alongside other previously existing affordable home ownership and rent options.<sup>15</sup>
- 3.1.12 There is a clear emphasis on increasing the opportunities for households in need of affordable housing to access home ownership. Through national First Homes Guidance (“FHG”) issued

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<sup>13</sup> Paragraph 63 NPPF Sept 2023, paragraph 64 NPPF Dec 2023

<sup>14</sup> Paragraphs 64 to 65 NPPF Sept 2023, Paragraphs 65 to 66, NPPF Dec 2023

<sup>15</sup> Under the Dec 2023 NPPF Annex 2 is to be read in conjunction with the Affordable Home Update Written Ministerial Statement 24 May 2021 – “WMS”

on the 24<sup>th</sup> of May 2021 in conjunction with the Affordable Home Update Written Ministerial Statement 24 May 2021 (“WMS”) the Government seeks 25% of all Affordable Housing as First Homes, subject to transitional provisions.

3.1.13 First Homes must be discounted by 30% against market value at minimum (in perpetuity), be sold to eligible purchasers (as defined in the FHG as First Time Buyers and with a combined household income of up to £80k outside Greater London), and have a sale price of no more than £250k (£420k in Greater London). These are the minimum national standards to be applied unless alternative approaches are applied through the Plan Making process and in accordance with the FHG / WMS.

3.1.14 The NPPG confirms that ‘all households whose needs are not met by the market can be considered in affordable housing need’.<sup>16</sup> It provides guidance on how both current and future affordable housing need can be assessed.<sup>17</sup> The NPPG sets out that the gross need for Affordable Housing should be informed by past trends and current estimates of a number of things including:

*“the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.”<sup>18</sup>*

3.1.15 This is a wide eligibility test, thus re-confirming the commitment by Government to widen Affordable Housing choice for all households (seeking to buy or rent) and unable to afford to access such homes on the open market.

3.1.16 Further significant proposed changes to the planning system set out within the ‘White Paper: Planning for the Future, August 2020’ consultation have been responded to by the Government through planning reform via the Levelling Up and Regeneration Act (“the Act”) November 2023. Much of the contents of the Act relies on secondary legislation being put into place before it can become operational. The ‘Planning for the Future’ August 2020 White Paper, the Levelling Up White Paper (February 2022) and the May 2022 ‘Levelling Up and Regeneration: further information’ Policy Paper, all make it clear that the delivery of affordable housing within developments remains of significant importance.<sup>19</sup>

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<sup>16</sup> Housing and Economic Needs Assessment Paragraph 018

<sup>17</sup> Housing and Economic Needs Assessment, paragraphs 019 - 024

<sup>18</sup> Housing Needs of Different Groups, Paragraph 006

<sup>19</sup> Paragraph 4.20, White Paper: Planning for the Future, August 2020 - **Appendix DP6**, page 223 Levelling Up White Paper February 2022 - **Appendix DP7**, and the ‘Delivering infrastructure’ section of the ‘Levelling Up and Regeneration: further information’ May 2022 Policy Paper - **Appendix DP8**

- 3.1.17 The NPPF<sup>20</sup> retains this objective and it is important to note that there is no downgrading within the latest December 2023 iteration of the NPPF of the importance of the provision of Affordable or market housing. The consultation paper ‘Levelling-up and Regeneration Bill: reforms to national planning policy’ which accompanied the consultation process for the December 2023 NPPF places an emphasis on the need to provide both Affordable Housing for owner occupation and for rent.<sup>21</sup>
- 3.1.18 The Standard Method continues to be the assessment by which local authorities should assess the ‘minimum’ Local Housing Need unless ‘exceptional’ circumstances justify otherwise. Whilst the emerging Local Plan does not fall to be considered under the December 2023 iteration of the NPPF,<sup>22</sup> it is helpful to consider that in the December 2023 NPPF footnote 25 has been added to emphasise that a high bar is set in terms of the exceptional circumstances that will need to be met to use an alternative method.
- 3.1.19 Whilst the December 2023 NPPF confirms the Standard Method to be an ‘advisory starting point’ for establishing an areas Housing Requirement,<sup>23</sup> paragraph 67 states that the requirement may be higher (as opposed to lower) than the identified housing need in certain circumstances. In any event, the relevant NPPF, September 2023 under which the emerging Local Plan should be Examined, does not refer to the Standard Method as an advisory starting point. It instead states that the Standard Method should be used in local housing needs assessments.
- 3.1.20 In terms of the Act, until this is accompanied by the various Statutory Regulations that will be needed for parts of it to come into operation, the NPPF continues to provide the national planning policy context within which Affordable Housing planning proposals should be considered.

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<sup>20</sup> September 2023 and December 2023

<sup>21</sup> ‘Levelling-up and Regeneration Bill: reforms to national planning policy’, paragraphs 2 – 4, Chapter 5 - **Appendix DP9**

<sup>22</sup> Paragraph 230, NPPF, December 2023

<sup>23</sup> Paragraph 61, draft NPPF

## **3.2 Local Policy**

- 3.2.1 The current development plan for North Somerset includes a Core Strategy (“CS”) initially adopted in 2012 following which additional policies were adopted in 2015 and 2017. Policy CS13 (re-adopted in 2015) plans for a supply of 20,985 homes overall across North Somerset during 2006 to 2026 (20 years) or c.1,049 per annum.
- 3.2.2 Policy CS14 (adopted in 2017 following re-examination) distributes this across North Somerset including 6,300 homes in Weston-Super-Mare (urban) a further 6,500 across Weston Villages, 5,100 in Clevedon, Nailsea and Portishead combined and a further 2,100 in Service Villages. Policy CS32 (also adopted in 2017 following re-examination) defines Yatton as a Service Village alongside other settlements (such as Backwell).
- 3.2.3 Policy CS16 ‘Affordable Housing’ was prepared prior to the current NPPF affordable housing definition and as such the target within it for the ‘at least 150’ annual affordable dwelling homes across the local authority area as a whole (i.e. c.3,000 over 20 years) to be provided as 82% for Social Rent and 18% ‘Intermediate’ affordable housing needs to be considered in the light of the revised affordable housing definition (which no longer categorises ‘intermediate’ affordable housing as a tenure type specifically). It is clear that the CS policy wording can be applied flexibly when making development control decisions.
- 3.2.4 Within the Pre-submission (reg 19) Autumn 2023 version of the ‘Local Plan 2039’, through emerging Policy SP8, ‘a minimum’ of 14,902 homes overall are planned for 2024 to 2039 (c.993 homes per annum for 15 years) although the proposed distribution of these totals 15,743 homes across the district as a whole (c.1,049 per annum thus aligning with the requirement in the adopted CS). Yatton and Backwell fall within a ‘villages and rural area’ alongside numerous other settlements for which a combined 3,610 overall housing supply is planned.
- 3.2.5 Additional information on the planned supply in these can be found in emerging Policy LP2 which sets out the proposed residential site allocations (for sites of 10 or more homes) within Schedule 1, including for Yatton Parish as follows:

Yatton – 207

Claverham - 24

- 3.2.6 Emerging Policy DP43 sets out the proposed approach to Affordable Housing provision. This seeks 38.5% Affordable Housing on Greenfield sites and 20% on previously developed land (“PDL”) (where sites are sized at 0.5 hectares / 10 dwellings or more).
- 3.2.7 The emerging policy wording sets out that the ‘precise size and type of Affordable Housing’ will be ‘guided’ by the ‘Local Housing Needs Assessment’, the ‘housing needs register’ and ‘local housing needs surveys’.
- 3.2.8 In terms of tenure, emerging Policy DP43 seeks 25% of Affordable Housing as First Homes, with the remaining 75% split as 90% Social Rent and 10% Shared Ownership, or 77% Social Rent and 23% Shared Ownership where it is agreed that First Homes will not be provided. Supporting text confusingly refers to a 90% Affordable Rent / 10% Shared Ownership split on the remaining 75% where 25% First Homes is applied, or a 77% ‘rented’ and 23% Shared Ownership where it is not.
- 3.2.9 The supporting text notes that the 2023 Dixon Searle viability evidence concludes that 0% Affordable Housing is likely to be viable in Weston town centre, whilst 20% is suggested to be viable in outer Weston and c.30% elsewhere in the district (reducing to 20% on PDL). As such, the Affordable Housing targets in Policy DP43 are suggested from the outset to be unlikely to be deliverable.
- 3.2.10 Proposed Policy DP46 relates to housing type and mix and, alongside other things, seeks residential development to be provided in a range of types and sizes of homes ‘as set out in the Local Housing Needs Assessment’. This is caveated that the tenure, type and size of housing will be ‘appropriate to the site size, characteristics and location’. The wording is not specific to Affordable Housing, which the policy confirms is covered under emerging Policy DP43.

*Neighbourhood Plan (“NHP”)*

- 3.2.11 The Yatton NHP was made in July 2019 and covers the 2017 to 2026 period. The Yatton NHP includes a Housing Objective HO 1. ‘To promote and maintain a mixed housing stock that includes affordable homes so that future generations can choose to stay in Yatton’. A single site is allocated for residential development, but the NHP does not contain policies specifically in respect of Affordable Housing provision.

## **4 MARKET HOUSING NEED**

### **4.1 Local Authority Evidence Base**

4.1.1 The Council's evidence base includes the North Somerset Local Housing Needs Assessment Report of Findings (October 2023) ("LHNA23") prepared by Opinion Research Services ("ORS") on behalf of North Somerset Council.

4.1.2 There is no assessment of Market or Affordable Housing need at a sub-local authority area level – the overarching conclusions on the number, tenure and mix of homes needed will not necessarily reflect localised requirements arising within Yatton.

#### Quantum

4.1.3 Within the Pre-submission (reg 19) Autumn 2023 version of the 'Local Plan 2039', through emerging Policy SP8, 'a minimum' of 14,902 homes overall are planned for 2024 to 2039 (c.993 homes per annum for 15 years) across North Somerset based on the LHNA23.<sup>24</sup>

4.1.4 The LHNA23 recommendation is significantly below the 1,347 homes acknowledged in the LHNA23<sup>25</sup> as being the minimum Local Housing Need figure for North Somerset established using the NPPF Standard Method.

4.1.5 Although the proposed distribution of the LHNA23 14,902 homes within the emerging Local Plan 2039 totals 15,743 homes (market and affordable) across the district as a whole, the basis for the distribution is unclear given the lack of sub-area level housing needs assessment within the LHNA23. Additional demographic modelling for Yatton Parish has been undertaken by Pioneer to project housing need at a Parish level and the outcome of this, in the context of planned supply, is summarised in Sections 4.2 and 4.3 below.

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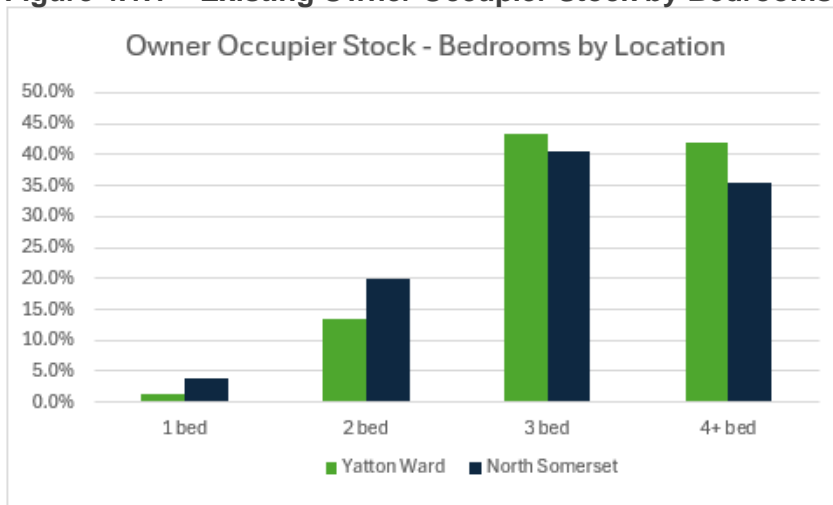
<sup>24</sup> Paragraph 3, LHNA23

<sup>25</sup> Figure 9, LHNA23

Market Housing Mix

4.1.6 Analysis of existing Owner Occupier housing stock based on 2021 Census data suggests that the mix of housing stock in Yatton is broadly similar to the North Somerset average, albeit with c.42% four bedroom homes compared to c.36% across North Somerset and a lower proportion (at c.15%) of entry level homes compared to North Somerset (at c.24%):

**Figure 4.1.1 – Existing Owner Occupier Stock by Bedrooms and Location**



Source: 2021 Census, ONS Crown Copyright Reserved 2024 – NB: Yatton Ward is the area on which this multivariate data is based as it is unavailable at a Parish administrative geography.

4.1.7 The LHNA23 conclusions on the mix of Market Housing need in North Somerset in Figure 52 are broken down not only by the number of bedrooms required, but also by dwelling type to suggest the following requirement over the 15 year period:

**Figure 4.1.2 – Summary of LHNA23 Market Housing Dwelling Mix**

	Market Housing
1 bed flat	2%
2+ bedroom flat	7%
1-2 bed house	11%
3 bed house	51%
4+ bed house	29%
	100%

Source: LHNA23 Figure 52

4.1.8 The basis of the LHNA23 conclusions on the mix of market dwellings required is not explained within the LHNA23 and the validity of the methodology cannot, therefore, be tested.

- 4.1.9 However, Figure 18 and paragraph 2.37 of the LHNA23 confirm that 43% of all household growth between 2024 and 2039 will be within families with dependent children. Whilst this is not tenure specific, that the majority (c.62%) of additional housing need in Figure 52 is suggested to be for market housing strongly suggests that there will be a significant requirement for open market family housing in North Somerset. The LHNA23 Figure 52 focuses the provision of this within 3 bedroom housing, followed by 4 bedroom housing.
- 4.1.10 Some c.80% of market housing need in North Somerset is suggested in the LHNA23 to be for 3 and 4 bedroom housing. Given the broad similarity in characteristics between Yatton Parish and North Somerset (in terms of household composition, age structure and tenure) it is reasonable to suggest that a similar proportion of larger market family housing will be needed in Yatton Parish, albeit subject to an increased proportion of entry level 2 bedroom market homes to reflect greater affordability challenges and the lower levels of such stock than across North Somerset on average.
- 4.1.11 The LHNA23 acknowledges that the modelling assumptions for Figure 52 assume that 481 older person households will move into C2 accommodation and that if this does not occur an additional 481 C3 homes will be needed to those assumed. Where these households occupy family open market housing, this housing will not become available for re-occupation by other families if these older person households do not move into C2 accommodation as assumed in the LHNA23. This would result in a significantly larger proportion of family market homes being needed than projected in the LHNA23. There is no sensitivity testing in the LHNA23 of alternative mix scenarios where older person households choose not to vacate their open market homes.
- 4.1.12 No evidence that older people will either downsize into three bedroom housing or move into C2 housing as assumed is provided in the LHNA23. The LHNA23 acknowledges that c.41% of owner occupiers aged 75+ have three bedrooms and c.23% have four or more; this supports that should older people not vacate their open market family homes as assumed in the LHNA23 there would be an additional need for 3+ bedroom market housing compared to that suggested in Figure 52.
- 4.1.13 In analysis published by the 'Centre for Ageing Better' nearly one in five people aged 50 to 69 are noted to have expressed 'stronger desire to move home because of lockdown – with



space and lack of privacy the biggest drivers'.<sup>26</sup> Notably 25% of people aged 60 to 69 would not want to move at all, and 32% of people aged 70+ would not want to move at all.<sup>27</sup>

4.1.14 The key point is that where insufficient private sector family housing for sale is provided this will be to the detriment of the whole market given that families will be unable to find suitable accommodation and cannot simply move to smaller properties which are not being taken up by downsizers / entry level purchaser, regardless of any policy ambitions in this regard. Such an approach has a high probability of failing to achieve the overarching National Planning Policy objective of facilitating sustainable development.

4.1.15 The emphasis should be on the flexible application of the market housing mix set out within the LHNA23 both across North Somerset and within Yatton Parish, particularly as the LHNA23 acknowledges that c.481 older people across North Somerset may not move into C2 housing as assumed in Figure 52 – as a significant proportion of older people are suggested to occupy three and four bedroom housing this would result in additional demand pressures on these sizes of dwelling. Where owner occupier older person households *do* decide to downsize into general needs two bedroom market housing this will also place additional pressures on this form of accommodation.

4.1.16 It is not in a developer's interest to deliver housing that it cannot sell and it is, therefore, essential that an element of flexibility is retained within policy and development control decisions, particularly in terms of market housing mix, allowing developers to react quickly to the ebb and flow in demand for different open market housing types and sizes. Any attempt to stifle this reactive approach will risk slowing or even preventing delivery and, therefore, act to frustrate overall housing delivery objectives. This view is acknowledged in the Callcutt Review of Housebuilding Delivery (published in November 2007) which says on page 20 that:

*“...local planning authorities should be very cautious about assuming that they are better able than developers to judge what the local housing market demands. It is true that the developer is concerned with making a return, not with serving the public interest; but the developer's judgement on what will best satisfy market demand is very likely to be better than the planning authority's”*

(emphasis added)

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<sup>26</sup> <https://ageing-better.org.uk/housing-state-ageing-2020> as at 5th September 2022, Source: [The Ageing Better NatCen Panel Homes and Communities Study 2020](#)

<sup>27</sup> Source: [The Ageing Better NatCen Panel Homes and Communities Study 2020](#)

- 4.1.17 It is notable that the Calcutt Review reached this conclusion during the peak of the market prior to recession, when market housing transactions were numerous. Any prescription of such matters should, therefore, be of significant concern, particularly as we are now faced with ongoing global economic uncertainty.
- 4.1.18 In this context, and having regard to the LHNA23 conclusions for North Somerset on market mix (and its assumptions on how older people will occupy their homes) and the existing characteristics of owner occupier housing in Yatton Parish, the primary focus should be on providing 3 bedroom family market housing whilst also increasing the proportion of entry level market homes above the c.15% recorded in the 2021 Census to improve the availability of both entry level and family housing in the Parish. Taking this approach will contribute towards meeting the need for homes in Yatton Parish.

## **4.2 Demographic Modelling**

### Overview

- 4.2.1 In the absence of any sub-area level assessment within the LHNA23 or within an assessment underpinning the Yatton NHP, demographic projections have been prepared by Pioneer to consider overall housing needs in Yatton Parish. This further modelling is useful as it will reflect differences in population distribution in terms of age and sex at a sub-area level compared to across the wider local authority area, providing a finer grained assessment for the analysis to inform local sub-area level overall housing requirements and to reach a view of the likely amount of this that will be needed as market housing.
- 4.2.2 Pioneer has modelled a scenario taking the 2014-based household projections as the starting point and assessing a 10 year period – 2023 to 2033 - in line with the Standard Method timeframe as currently set out in the NPPG and the 2023 to 2033 timeframe applied to the Standard Method calculation within the LHNA23.<sup>28</sup> The NPPG continues at present to utilise the 2014-based household projections to inform Standard Method local housing need (“LHN”) calculations.<sup>29</sup>
- 4.2.3 The projections developed are based on the most up-to-date information available from both Office for National Statistics (“ONS”) and the Department for Levelling Up Housing and

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<sup>28</sup> Figure 9, LHNA23

<sup>29</sup> Paragraph: 004 Reference ID: 2a-004-20201216

Communities (“DLUHC”) and calibrated by up-to-date sub-area information using 2021 Census population<sup>30</sup> and vacancy level data.<sup>31</sup>

- 4.2.4 The 2022 mid-year population estimates (“MYE2022”) have so far at the time of preparing this report not been published by the ONS at a Lower Super Output Area level broken down by single year of age and sex. For this reason 2021 Census population data is used to inform the sub-area Affordable Housing needs modelling, but the MYE2022 population data suggests an increased number of households in the Parish to be likely.
- 4.2.5 The purpose of this section is to provide an additional up to date demographic approach to projecting the likely required level of housing and based on this, affordable housing need in Yatton Parish.

#### Methodology

- 4.2.6 The methodology to look at smaller-area projections has involved setting up a model for the local authority area and then using a sub-model for Yatton Parish. Within the modelling it is broadly assumed that a proportional increase in population in any age/sex category across the district will also occur at a smaller area level.
- 4.2.7 The methodology works by looking at incremental changes in each age and sex band (for each year of each projection) and applies this to the local population. For example, if a particular age/sex group is projected to increase by 10% local authority-wide then the methodology will assume a similar level of population growth for that particular age/sex group at a smaller area level albeit applied to the existing age / sex profile in that location (which may differ to that at a local authority wide level).
- 4.2.8 The methodology used to assign the population change figures to smaller areas is therefore based on overall change at a local authority-wide level (by age and sex) being applied to the demographic profile of the local population. This methodology takes account of past trends in fertility, mortality and migration to the extent that these will have shaped the current population profile (with such trends likely to shape the future population). Some of the key data sources are summarised below:

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<sup>30</sup> Using custom datasets from the Office for National Statistics

<sup>31</sup> Number of dwellings by housing characteristics in England and Wales, ONS, 30 March 2023

- 2014-based DLUCH<sup>32</sup> household projections – provides baseline data at local authority level
- ONS mid-year population estimates (MYE) / 2021 Census data (which ever provides the most recent position at time of modelling) – provides an up-to-date view on the age/sex profile of the local population.<sup>33</sup>
- 2021 Census – provides a range of information including about population, household spaces and vacancy rates

4.2.9 The methodology is essentially taking a need for housing across the local authority area and estimating what proportion should be in Yatton Parish, but recognising the different demographic structure in each area.

4.2.10 However, the analysis is not seeking to establish the overall need for housing in the local authority area (the local housing need (or “LHN”)), but the starting point for the demographic analysis in this report has been aligned with the starting point within the Government Standard Method (i.e. which remains the 2014-based DLUCH household projections).

#### Overall Housing Projection Summaries and Outputs

4.2.11 The overarching projection approach can be summarised as follows:

##### **DLUHC 2014-based household projections (“PROJ 1a”)**

- This baseline demographic projection reflects the level of household growth reported in the DLUHC 2014-based household projections (which is the same starting point as the Standard Method prior to any uplift) applied within the context of local level 2021 Census based population data, which is then converted into housing numbers through the application of a vacancy rate based on 2021 Census data.<sup>34</sup>

4.2.12 The following table provides the Yatton Parish outputs:

<sup>32</sup> Department for Levelling Up, Housing and Communities

<sup>33</sup> Lower Layer Super Output Areas (“LLSOA”) are applied as a best fit to Yatton Parish as set out in Section 2 above. 2021 Census estimates used in this modelling classify all usual residents in England and Wales by age and sex as at census day, 21 March 2021.

<sup>34</sup> Number of dwellings by housing characteristics in England and Wales, ONS, 30 March 2023

**Figure 4.2.1 – Projected Household Growth**

Parish	Household Growth 2023 - 2033	
	PROJ 1a - DLUCH 2014-based household projections	
	No.	% change
Yatton	433	9.47%

Source: Pioneer March 2024

4.2.13 The above Yatton Parish projection is prior to any adjustment factor having been applied to reflect affordability pressures based on workplace based median incomes and house prices (i.e. in line with the Standard Method). The Standard Method formula applied when using the Standard Method calculation<sup>35</sup> suggests an adjustment factor of ‘1.3775’ (or c.38%) for North Somerset.<sup>36</sup>

4.2.14 Whilst house prices vary from sub-area to sub-area the local authority adjustment reflects the average across North Somerset and so remains a reasonable adjustment for the Parish assessment. The NPPG clarifies that:

*“An affordability adjustment is applied as household growth on its own is insufficient as an indicator of future housing need because:*

*-household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and*

*-people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.*

*The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this*

<sup>35</sup> Step 2 ‘An adjustment to take account of affordability’ of the Local Housing Need calculation set out in the NPPG ‘Housing and Economic Development Needs Assessment’ section, paragraph 4

<sup>36</sup> Based on the 2022 median workplace-based affordability ratio ONS spreadsheet as advised in the NPPG - the most recent available although recent median house price and income data explored in Section 2 above suggests this remains at c.10 for the year ending 2023.

guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”

(Housing and economic needs assessment paragraph 6, NPPG)

4.2.15 When calculating local housing need figures the NPPG advises the application of a cap to any uplifts (the approach to which depends upon the age of the plan) to ensure that the minimum local housing need figure is ‘as deliverable as possible’.<sup>37</sup> However, the purpose of this part of this report is to assess the need for housing at a sub-area level. The NPPG does not refer to sub-area housing need assessments being subject to caps, although delivery will obviously be limited by the availability of suitable land. As such, it is appropriate to understand the full likely extent of housing need when establishing the need for additional housing and the weight to be attached to the benefit of providing this additional housing.

4.2.16 When the North Somerset affordability adjustment factor is applied to the Yatton Parish projection this suggests the following overall dwelling requirement in Yatton Parish:

**Figure 4.2.2 – Projected Overall Dwelling Requirement**

Parish	PROJ 1a - DLUCH 2014-based household projections					
	Household Growth	Household Growth Plus Affordability Adjustment Factor (1.3775)	Vacancy Rate	Household Growth Converted into Dwellings (Using Vacancy Rate) 2023 - 2033	Dwellings Over 15 yrs	Dwellings Per Annum
<b>Yatton</b>	433	596	3.9%	620	930	62

Source: Pioneer March 2024

NB: All outputs subject to rounding, NPPG affordability adjustment based on 2022 median workplace-based affordability ratio - the most recent available, vacancy rate based on 2021 Census data<sup>38</sup>

4.2.17 The above dwelling requirement includes both market and Affordable Housing, although given the significant amount of Affordable Housing need once backlog unmet Affordable Housing need is taken into account, the overall amount of housing that would be needed to address this need without risking development viability is likely to exceed the above total.

<sup>37</sup> ‘Housing and Economic Development Needs Assessment’ section, paragraph 7, NPPG

<sup>38</sup> Vacancy Rate for overall housing calculation = Number of dwellings by housing characteristics in England and Wales, ONS, 30 March 2023

- 4.2.18 In this regard it can be noted that the 2023 Dixon Searle viability evidence underpinning the emerging local plan concludes that 0% Affordable Housing is likely to be viable in Weston town centre, 20% is suggested to be viable in outer Weston and c.30% elsewhere in the district (reducing to 20% on PDL) – i.e. suggesting 30% to be the maximum viable proportion of Affordable Housing in Yatton Parish.
- 4.2.19 A further point to consider is that household projections are trend-based drawing on population projections which use past trends in migration, fertility and mortality – this may result in constrained household projection outcomes; matters such as migration are harder to predict for smaller areas. As already noted, the MYE2022 suggest population increases at a local authority level (with significant international net migration components) and Parish level which are likely to result in increases, as opposed to decreases, in projected households.

### **4.3 Market Housing Need and Supply**

- 4.3.1 The Yatton Parish level of overall housing need projected over a 15 year period based on demographic modelling undertaken by Pioneer (totalling 930 homes as summarised in Figure 4.2.2) can be compared to the supply of overall housing planned to be allocated in Yatton Parish.
- 4.3.2 The Yatton NHP allocates a single brownfield site for residential development during the 2017 to 2026 period, suggested in the examining Inspector’s report to have previously been subject to an application for 37 dwellings.<sup>39</sup>
- 4.3.3 The Strategic Housing Land Availability Assessment (November 2023 – “SHLAA”) concludes there to be a total of three sites which could have the potential to deliver 322 homes subject to further investigation in Yatton and Claverham.<sup>40</sup> The SHLAA also refers to Yatton has having seen 30 homes completed between 2018/19 and 2022/23 (i.e. 6 per annum) via windfall sites (no windfalls are identified for Claverham).<sup>41</sup> Beyond anecdotal commentary<sup>42</sup> the SHLAA does not provide any significant degree of reasoning in terms of why this level of delivery should be expected to continue in future years.

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<sup>39</sup> Paragraph 4.68, Yatton Neighbourhood Development Plan 2017-2026, 18<sup>th</sup> January 2019

<sup>40</sup> Page 30, SHLAA, November 2023

<sup>41</sup> Page 18, SHLAA, November 2023

<sup>42</sup> Paragraph 6.22, SHLAA, November 2023

- 4.3.4 The Spatial Strategy and capacity paper (November 2023 – “SSCP”) states that Yatton and Backwell have been amalgamated within the Local Plan 2039 into the ‘Rural Area’,<sup>43</sup> but additional information is provided at paragraph 7.1 in a table which identifies 207 dwellings as existing commitments and a further 90 dwellings based on a windfall assumption of 6 homes per annum (based on past trends set out in the SHLAA as noted above) over a 15 year emerging Plan period. Claverham is not referenced; presumably it is included within ‘other areas’ and includes no windfall assumption in line with past trends.
- 4.3.5 Policy LP2 / Schedule 1 (emerging Policy SP08 does not identify a housing target for Yatton Parish specifically) suggests a planned supply of 207 homes in Yatton and 24 in Claverham (which falls within Yatton Parish) 2024 to 2039. A further 90 dwelling supply is suggested by the SSCP to apply to Yatton Parish over the 15 year period based on past trends in windfalls. This supply total (321) enables consideration of the ability of the overall proposed housing distribution to assist with meeting the housing need arising in Yatton Parish (although the inclusion of 90 windfall dwellings is open to challenge given a lack of evidence to support future trend assumptions).
- 4.3.6 A proportion of the 930 projected housing requirement is needed as Affordable Housing and a proportion of the 321 planned supply (231 excluding small site windfalls<sup>44</sup>) will be provided as Affordable Housing. This is considered in more detail within Section 5 below, but the LHNA23 suggests that between 38.5% (‘policy-on’) and 89.5% (unconstrained) of all additional housing in North Somerset is needed for Affordable Housing. Affordability in Yatton is suggested to be more challenging than across the wider local authority on average so lower requirements are unlikely to apply in Yatton Parish.
- 4.3.7 Notwithstanding this, the high level 2023 Dixon Searle viability evidence suggests 30% Affordable Housing to be viable in locations such as Yatton suggesting that a minimum of c.651 of the 930 projected overall housing need would need to be provided as market homes if Affordable Housing is to be delivered at a viable level. However, this means that planning for a supply of 930 homes overall (with 651 homes as market housing) will be insufficient to address the full ‘unconstrained’ need for Affordable Housing.

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<sup>43</sup> Paragraphs 1.4 and 6.12, SSCP, November 2023

<sup>44</sup> Small sites under the Affordable Housing site size threshold will not generally deliver Affordable Housing



- 4.3.8 Based on a 231 planned overall housing supply excluding 90 small site windfalls (due to Affordable Housing site size thresholds) and the Dixon Searle viability evidence c.69 affordable homes (231 x 30%) could be provided in Yatton Parish during 2024 to 2039.
- 4.3.9 When these Affordable Homes are deducted from the overall planned housing supply a planned supply of 252 market homes (i.e. 231 minus 69 affordable homes, plus 90 windfall dwellings as market housing) is suggested 2024 to 2039 in Yatton Parish and can be compared to a requirement for 651 market homes.
- 4.3.10 Unless additional supply sources are identified, a 651 market housing requirement is c.2.6 times the planned supply of market housing and a shortfall of c.399 market homes could accrue in Yatton Parish over the 2024 to 2039 period:

**Figure 4.3.1 – Market Housing Need Yatton Parish 2024 - 2039**

Parish	Projected Market Housing Required 2024 - 2039	Maximum Overall Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations	Shortfall / Surplus in Market Housing 2024 to 2039	Market Housing Need as a % of Policy LP2 Overall Planned Housing Allocations and windfalls
<b>Yatton</b>	651	252	-399	258%

Source: Pioneer March 2024

NB: All outputs subject to rounding, a minus figure equals a shortfall

## 5 AFFORDABLE HOUSING NEED

### 5.1 Local Authority Evidence Base

5.1.1 As noted in Section 4 above, there is no assessment of Market or Affordable Housing need at a sub-local authority area level – this means the overarching conclusions on the number, tenure and mix of homes needed will not necessarily reflect localised requirements or even different requirements arising within Yatton.

#### Tenure Split

5.1.2 Affordable Housing tenure analysis is not provided within the LHNA23 or within a Parish level Housing Needs Survey or Assessment for Yatton. The only position on Affordable Housing tenure split is therefore that provided at a local authority level within the LHNA23.

5.1.3 Figure 51 of the LHNA23 suggests that across North Somerset (“NS”) 8,589 households (during 2024-2039 – 15 years) need Affordable Housing on the basis that they aspire to own their own home, can afford market rents, but are unable to afford to buy. This is in addition to 4,058 households in need of Affordable Housing who cannot afford market rents (giving a total need from 12,647 households eligible for Affordable Housing). This translates as a 68% Affordable Home Ownership (“AHO”) and 32% other forms of affordable housing tenure split.

5.1.4 However, the LHNA23 goes on to suggest that the Council should only plan to meet the Affordable Housing needs of 1,463 of the 8,589 households, resulting in a constrained ‘policy-on’ overall Affordable Housing requirement from 5,521 households. This translates as a c.27% Affordable Home Ownership (“AHO”) and 73% other forms of affordable housing tenure split.

5.1.5 To arrive at this constrained ‘policy on’ Affordable Housing need the LHNA23 applies various deductions to the 8,589 households assessed in Figure 51 as aspirational purchaser households able to afford market rents, but unable to afford to buy a suitable home. However, based on the NPPF Affordable Housing definition and the NPPG and as acknowledged at paragraph 4.4 of the LHNA23 **all** such households are eligible for Affordable Housing.

5.1.6 At paragraph 4.58 the LHNA23 also acknowledges that the NPPF and NPPG do not specify that affordability tests should be applied to such households (beyond that they are unable to afford open market housing) as part of the net Affordable Housing need assessment process.

- 5.1.7 When adjustments are made to the LHNA23 constrained 'policy-on' scenario to factor in that i) a number of households eligible for Affordable Housing will source a deposit / other funds from family and parents (as opposed to from savings) and that ii) a further number of households unable to afford market rents, in need of affordable housing and aspiring to buy will be able to afford AHO, a c.50% Affordable Home Ownership and 50% rented affordable housing tenure split is suggested<sup>45</sup> (although this is still constrained in that it will not address all of the AHO need from eligible households).
- 5.1.8 The LHNA23 conclusion that First Homes should start at a 50% discount to open market value ("OMV") is unjustified given that 'at least 30%' is a minimum discount not a cap and the majority (58%) of the households included by the LHNA23 in need of AHO are suggested by the LHNA23 to be able to afford First Homes at a 30% discount.<sup>46</sup> The AHO element is suggested to be needed across a range of housing costs, with LHNA23 data suggesting that Discounted Market Sale options provide a more affordable option than Shared Ownership.<sup>47</sup> Furthermore, the Dixon Searle 2023 North Somerset Viability Assessment does not appear to test viability at a 50% discount to OMV, only at a 30% discount (paragraph 3.2.2).
- 5.1.9 Whilst sub-area outputs are not presented in the LHNA23, location specific data on the tenure of existing Affordable Housing stock suggests Yatton has similarly low levels of AHO to that across North Somerset on average. Affordable housing can, therefore, reasonably be provided in a similar split to that across the local authority area as a whole i.e. within the range of 27% to 68% AHO with the balance as rented Affordable Housing.
- 5.1.10 Affordability within in parts of Yatton is suggested to be more challenging than across North Somerset on average. As such, Yatton Parish will benefit significantly from the provision of new Affordable Housing.

#### Quantum

- 5.1.11 Whilst there are no sub-area level outputs for Affordable Housing need within the LHNA23, the LHNA23 local authority wide Affordable Housing need outputs can be used to assist with understanding the proportionate Yatton Parish level of Affordable Housing need.
- 5.1.12 As noted under Affordable Housing tenure above, the LHNA23 concludes a need from 12,647 households for Affordable Housing 2024 to 2029 (over 15 years) across North Somerset, but

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<sup>45</sup> See Appendix 1 for additional information.

<sup>46</sup> See Appendix 1 for additional information.

<sup>47</sup> See Appendix 1 for additional information.

goes on to apply various deductions to households aspiring to AHO resulting in a constrained 'policy-on' overall Affordable Housing requirement from 5,521 households.

5.1.13 When converting the households needing Affordable Housing into dwellings at paragraph 4.72 a 0.47% rate appears to be applied by the LHNA23<sup>48</sup> based on dwellings without a usually resident household. However, the Regulator of Social Housing ("RSH") Statistical Data Return ("SDR") 2023 reports a 2.1% vacancy rate in Affordable Housing stock in North Somerset.

5.1.14 Applied to the 12,647 households needing Affordable Housing (i.e. unconstrained) a 2.1% vacancy rate suggests a total requirement for 12,913 affordable homes over 15 years across North Somerset. Applied to the LHNA23 constrained 'policy on' Affordable Housing requirement (5,521 households) a 2.1% vacancy rate results in a requirement for 5,637 affordable homes over 15 years across North Somerset.

5.1.15 To estimate Affordable Housing need across Yatton Parish it can be assumed to arise within the Parish at a rate per person that is broadly proportionate with that across the local authority area. This 'top down' approach is applied in this section in respect Yatton Parish.

5.1.16 Based on the 2021 Census Yatton Parish and North Somerset are suggested to contain the following usual resident population:

**Figure 5.1.1 – Usual Resident Population**

Location	2021
Yatton Parish	8,073
North Somerset	216,727

Source: ONS 2021 Census - ONS Crown Copyright Reserved 2024

5.1.17 The above population data provides a useful starting point for estimating the net need for additional affordable homes in Yatton Parish assuming that this need will arise at a rate per head of population proportionate to that across North Somerset as a whole.

5.1.18 For this modelling 2021 Census population data is used to inform this sub-area Affordable Housing needs modelling to align with the demographic modelling in sections 4.2 and 5.2, but 2022 MYE population data suggests an increase in the number of households to be likely.

<sup>48</sup> Based on the 5,521 households suggested in Figure 51 and paragraph 4.69 to need Affordable Housing being converted into 5,547 dwellings in paragraphs 4.71 and 4.72

5.1.19 The LHNA23 Affordable Housing Need (ranging from 5,637 to 12,913<sup>49</sup> over the 2020 to 2035 period) suggests the following rate of Affordable Housing need per person which can be applied to the Yatton Parish population:

**Figure 5.1.2 – Affordable Housing Need based on the LHNA23 (2024 – 2039)**

Location	Tenure	2021 Census Total Population	Rate of Affordable Housing Need per Person	Affordable Housing Need (LHNA23 based range)*
North Somerset	Rented Affordable Housing	216,727	0.019	4,143
	Affordable Home Ownership Housing		0.007 to 0.040	1,494 to 8,769
	<b>TOTAL Affordable Housing Need</b>		<b>0.026 to 0.060</b>	<b>5,637 to 12,913</b>

Source: Pioneer Analysis based on 2021 Census - ONS Crown Copyright Reserved 2024 and LHNA23 \*This range is based on outputs in the LHNA23 Figure 50 and paragraph 4.69, and converting need from households into dwellings based on a 2.1% vacancy rate (in line with SDR data)

5.1.20 The application of these rates of Affordable Housing need suggests the following range of net Affordable Housing need in across the Parish over a 2024 to 2039 period:

**Figure 5.1.3 – Yatton Parish Affordable Housing Need based on the LHNA23 (2024 – 2039)**

Parish	Population	Affordable Housing Need - LHNA23 based Range (2024 - 2039 or 15yrs)					
		Rented Affordable Housing	Affordable Home Ownership Housing		TOTAL Affordable Housing Need		
			Constrained 'Policy-on'	All Eligible Hholds	Constrained 'Policy-on'	All Eligible Hholds	
<b>Yatton</b>	8073	154	56	to 327	210	to 481	

Source: Pioneer Analysis based on 2021 Census - ONS Crown Copyright Reserved 2024 and LHNA (subject to rounding)

<sup>49</sup> The 12,913 figure includes all households able to afford to rent privately but aspiring to home ownership and unable to afford to buy a suitable home on the open market in line with the NPPF / NPPG eligibility for Affordable Home Ownership plus a vacancy rate in line with that suggested by SDR data (at 2.1%),

Housing Waiting List

5.1.21 In terms of unmet current / backlog Affordable Housing need Housing Waiting List data has been provided by the Council at a Parish level (see Appendix 2) which provides an insight into this:

**Figure 5.1.4 – Housing Waiting List Data**

Location	Households on the Housing Waiting List
Yatton Parish	985

Source: North Somerset Council, January 2024 – see Appendix 2

5.1.22 The above data, whilst caveated on the basis that households can select more than one location and the data is not reflective of households' first choice for location, nevertheless suggests that Yatton is likely to be subject to significant demand pressures for Affordable Housing.

5.1.23 The Housing Waiting List data may not include households who are able to afford to rent privately but aspire to own their own home and are unable to afford to do so and nor will it include newly arising need in future years. Data specifically on households waiting for Affordable Home Ownership housing is not held by the Council (see Appendix 2).

Affordable Housing Mix

5.1.24 As with tenure split and quantum, the LHNA23 does not provide sub-area level housing mix requirements, but provides the following mix of Affordable Housing need in Figure 52 across North Somerset as a whole, broken down not only by the number of bedrooms required, but also by dwelling type over the 15 year period:

**Figure 5.1.5 – Summary of LHNA23 Affordable Housing Dwelling Mix**

	Rented Affordable Housing	Affordable Home Ownership*
1 bed flat	14%	25%
2+ bedroom flat	19%	28%
1-2 bed house	21%	16%
3 bed house	36%	26%
4 bed house	8%	4%
5 bed house	2%	1%
	100%	100%

Source: LHNA23 Figure 52 \*At a discount of at least 30%

5.1.25 The basis of the LHNA23 methodology on the mix of housing required is not explained and so the validity of the conclusions cannot be tested.

*Rented Affordable Housing*

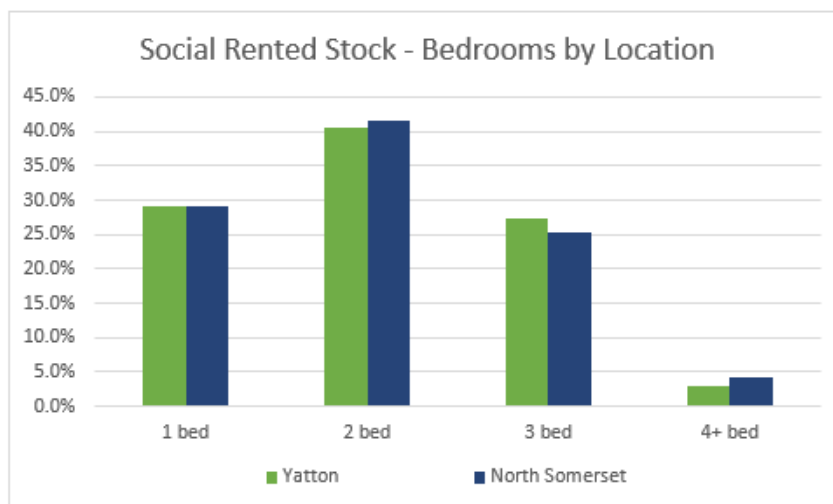
5.1.26 As set out in respect of quantum (and in Appendix 1) the LHNA23 excludes certain households (the additional need from which is likely increase the requirement for 1 and 2 bedrooms) from being included in the Affordable Housing need calculations and, with backlogs annualised over 15 years, provides no view on the size and type of Affordable Housing needed in the short to near term.

5.1.27 Local Authority Housing Statistics 2021/22 (“LAHS”) report a total of 2,078 households waiting for one and two bedroom rented Affordable Housing in North Somerset. This is a huge c.83% of all 2,516 households on the Housing Waiting list.

5.1.28 As at January 2024 Housing Waiting List data provided by the Council (see Appendix 2) suggests that 76% of all households waiting for general needs Affordable Housing and 80% of all households overall (including waiting for sheltered housing) are seeking rented Affordable Housing with one to two bedrooms.

- 5.1.29 The level of three and four bedroom rented Affordable Housing need suggested by the LHNA23 across North Somerset does not seem credible given the huge current numerical backlog need for 1 bedroom rented housing at 1,331 households and given that this has remained unaddressed over recent years consistently accounting for c.50% of the overall Housing Waiting List (suggesting the supply of 1 bed homes is routinely significantly failing to meet demand) and the fact that the majority of newly forming households will be unlikely to need (or be eligible for) 3 bedroom or larger rented affordable homes.
- 5.1.30 At a Parish level Housing Waiting List data provided by the Council (see Appendix 2 - this enables households to select more than one location and is not reflective of households' first choice for location) broadly suggests that 78% of all selections by households across Yatton is for general needs rented Affordable Housing with one and two bedrooms. When all selections (including for sheltered housing) are included this broadly suggests that 82% of all selections by households across Yatton is for one and two bedroom rented Affordable Housing.
- 5.1.31 Analysis of existing Social Rented Affordable Housing stock based on 2021 Census data (data is not included in the 2021 Census for Affordable Rent) suggests that the mix of housing stock in Yatton Parish is broadly similar to the North Somerset average with the majority of homes (over 90%) provided with one, two and three bedrooms.

**Figure 5.1.6 – Comparison of Existing Social Rented Stock by Bedrooms and Location**



Source: 2021 Census, ONS Crown Copyright Reserved 2024



5.1.32 In the absence of sub-area level outputs within the LHNA23 or any local housing needs survey, using multivariate 2021 Census data for North Somerset in combination with sub-area level 2014 based Household Projections<sup>50</sup> over a 10 year period<sup>51</sup> it is possible to project the sizes of homes that households living in rented Affordable Housing in Yatton Parish are likely to require if households continue to occupy homes as they have previously (in terms of size mix and tenure) within each age cohort.<sup>52</sup>

5.1.33 This provides a baseline output on the additional number of rented affordable dwellings required by dwelling size based on a 2023 to 2033 period (in line with the Standard Method overall local housing need calculation ten year timeframe and the 2023 starting point in the LHNA23). This suggests the following additional rented Affordable Housing dwelling mix requirement in Yatton Parish:<sup>53</sup>

**Figure 5.1.7 – Yatton Rented Affordable Housing Mix Requirement 2023 - 2033**

	Change Required 2023 - 2033	Change Required 2023 - 2033
1 bedroom	17	45%
2 bedrooms	14	37%
3 bedrooms	6	15%
4 bedrooms	1	3%
<b>TOTAL</b>	<b>37</b>	<b>100%</b>

Source: Pioneer March 2024, ONS 2021 Census Custom Dataset, Pioneer sub-area 2014 Household Projections

5.1.34 The above does not include any backlog / current unmet rented Affordable Housing need, but current Housing Waiting List data suggests this is predominantly comprised of households waiting for 1 and 2 bedroom homes and is unlikely to increase the proportionate requirement for 3 or 4+ bedroom homes. Whilst the above assumes past trends in how households across the age cohorts occupy housing in North Somerset as a whole (in terms of tenure and size) it provides a useful basic cross-check against which the LHNA23 rented North Somerset wide

<sup>50</sup> See sub-area demographic modelling in Section 5 below

<sup>51</sup> given the 2014 projections are still required to be used by the current NPPG for the Standard Method Local Housing Need calculation

<sup>52</sup> The modelling assumes that homes in Yatton will be occupied by age and tenure and number of bedrooms as they are across North Somerset on average (both as at 2023 and 2033) but this occupation 'profile' is applied to sub-area level household projections (based on modelling summarised in Section 5 below) which reflect the different distribution of households across age cohorts within Yatton Parish.

<sup>53</sup> Shared Ownership is included within market housing in the multivariate data as separating it out significantly reduces the locations for which data is provided across the combination of multivariate topics selected - hence this Affordable Housing mix projection relates to Social Rent Affordable Housing.

Affordable Housing need outputs can be considered when seeking to understand likely housing mix requirements at a Parish level.

- 5.1.35 Having regard to this additional analysis, existing stock profiles (which are similar to the wider local authority area) and the existing data within the LHNA23 for North Somerset proposing up to c.80% of additional rented Affordable Housing with one and two bedrooms alongside a remaining proportion of 3 bed and / or larger family homes would be reasonable approach to the delivery of rented Affordable Housing in Yatton Parish.

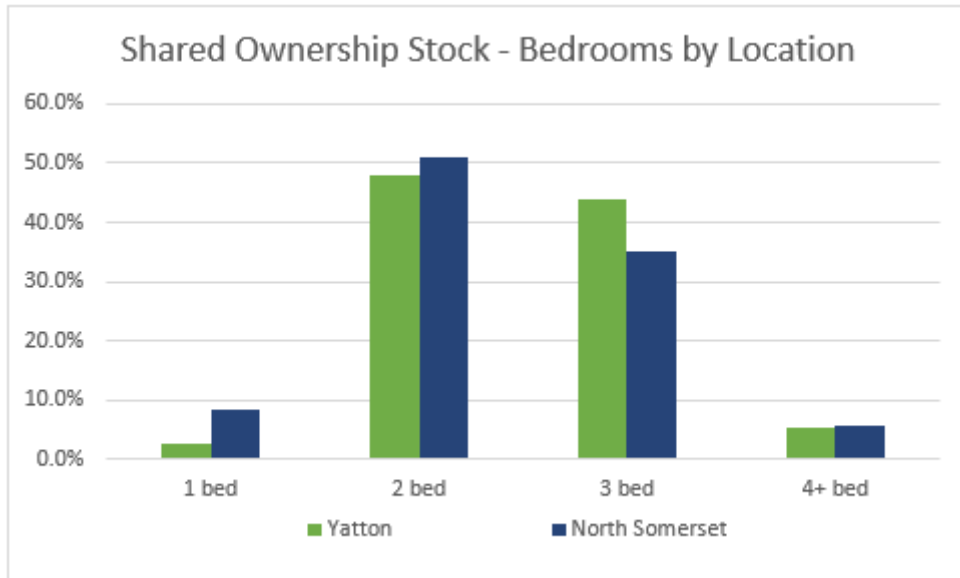
*Affordable Home Ownership*

- 5.1.36 The mix of Affordable Home Ownership (“AHO”) dwellings suggested in Figure 52 of the LHNA23 to be needed in North Somerset looks to be based on the size of dwellings purported to be required by households in Figure 50. The LHNA23 mix includes a 53% demand for one and two bedroom flats.
- 5.1.37 However, whilst First Homes and / or discounted market sale could assist with meeting demand for apartments, in our experience as Affordable Housing consultants working daily on the provision of Affordable Housing via Registered Providers, Shared Ownership provision will need to be focused on 2 and 3 bedroom houses. Anecdotally, Registered Providers do not generally want Shared Ownership with 4+ bedrooms due to affordability and perceived household purchaser demand being focussed on 2 and 3 bedroom AHO.
- 5.1.38 Having regard to the above operational / demand factors and given the lack of transparency in the LHNA23 on how the mix / type conclusions are arrived at, the AHO mix proportions in the LHNA23 should not be imposed on developments as fixed targets within Plan Policy.
- 5.1.39 At a Yatton Ward<sup>54</sup> level analysis of existing Shared Ownership Affordable Housing stock based on 2021 Census data (other tenures of AHO are not reported on) suggests a limited proportion of 1 and 4 bedroom Shared Ownership homes (in line with North Somerset averages):

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<sup>54</sup> This multivariate data is unavailable based on a Parish geography

**Figure 5.1.8 –  
Comparison of Existing Shared Ownership Stock by Bedrooms and Location**



Source: 2021 Census, ONS Crown Copyright Reserved 2024

5.1.40 This could be reflective of a limited demand both in Yatton Ward and across North Somerset from purchaser households for this kind of accommodation (with 4+ being subject to affordability constraints) and / or likely Registered Provider preferences for the provision of 2 and 3 bedroom Shared Ownership.

5.1.41 In the wider context of trends in demand from First Time Buyers, preferences generally expressed by Registered Providers and the profile of existing stock, providing an AHO mix that includes c.70% 2 bedroom (predominantly houses) and c.30% 3 bedroom houses represents a reasonable approach for AHO delivery in Yatton Parish subject to site specific constraints and objectives.

## 5.2 Demographic Modelling

- 5.2.1 It is necessary to determine the level of the 433 local household growth set out in Figure 4.2.1 (once affordability adjusted to be consistent with the Government policy objective of significantly boosting the supply of homes) that is from households likely to require Affordable Housing and how many additional Affordable dwellings will need to be provided to meet the requirements of these households.
- 5.2.2 The LHNA23 Figure 52 suggests that c.38.5% of all housing needed in North Somerset is needed as Affordable Housing<sup>55</sup> (this is reflected in the target in emerging Policy DP43).
- 5.2.3 The c.38.5% Affordable Housing need threshold reflects various affordability based deductions applied in the LHNA23 to the aspirational purchaser households eligible for Affordable Housing and which are included in Figure 52 which results in a constrained 'policy-on' Affordable Housing need from households unable to afford a market housing solution. If all households eligible for Affordable Housing are included affordable housing need equates to c.89.5% of the LHNA23 overall housing need.<sup>56</sup>
- 5.2.4 As noted in Section 5.1 above the Regulator of Social Housing ("RSH") Statistical Data Return ("SDR") 2023 reports a 2.1% vacancy rate in Affordable Housing stock in North Somerset; this can be applied when considering how many additional dwellings need to be delivered to meet the Affordable Housing need from the households projected to need it.
- 5.2.5 As also noted in Section 5.1, there is no assessment of affordable housing need at a sub-area level within the LHNA23 that reflects differences in population distribution in terms of age and sex at a sub-area level. In the absence of any sub-area assessment the c.38.5% 'policy-on' constrained and 89.5% unconstrained proportions of overall housing suggested in the LHNA23 likely to be needed as Affordable Housing can reasonably be applied to the sub-area level demographic modelling outputs set out above. These reflect differences in population distribution in terms of age and sex at a sub-area level to provide a view on the range of Affordable Housing need where this is linked to projected household growth.
- 5.2.6 Applied to the overall household growth output in Figure 4.2.1 and converted into dwellings using a 2.1% vacancy rate based on SDR data these Affordable Housing thresholds suggest

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<sup>55</sup> Excluding C2 provision. i.e. 5,547 is 38.5% of 14,421

<sup>56</sup> 12,913 is 89.5% of 14,421

the following range of Affordable Housing need across Yatton Parish annually and over the 15 year emerging Plan period:

**Figure 5.2.1 – Affordable Housing Need Projection**

<b>Parish</b>	<b>Annual Household Growth Plus Affordability Adjustment Factor (1.3775)</b>	<b>Affordable Housing Need Per Annum @ 38.5% to 89.5% of Household Growth plus 2.1% Vacancy Rate</b>	<b>Projected Range of Affordable Housing Need over 15 Yrs</b>
<b>Yatton</b>	59.6	23.45 to 54.50	352 to 818

Source: Pioneer March 2024 drawing on DLUCH 2014-based household projections

NB: Annual Household Growth based on Figure 4.2.1 i.e. (433\*1.3775)/10 and the

'Projected Range of Affordable Housing Need Over 15 years' is based on 'Affordable Housing Need Per Annum' outputs multiplied by 15 years and subject to rounding.

5.2.7 It should be noted that this will not include unmet current (i.e. backlog) Affordable Housing need (such as included in the LHNA23 'Top Down' scenario) and that household projections are trend-based drawing on population projections which use past trends in migration, fertility and mortality – this may result in constrained household projection outcomes; matters such as migration are harder to predict for smaller areas. As already noted, the MYE2022 suggest population increases at a local authority level (with significant international net migration components) and at a Parish level which are likely to result in increases, as opposed to decreases, in projected households.

### 5.3 Affordable Housing Need and Supply

#### Past Supply

5.3.1 Data on Affordable Housing completions at a sub-area level has been provided by the Council as follows:

**Figure 5.3.1 – Affordable Housing Completions in Yatton Parish 2018/19 to 2022/23**

Year	Yatton
2018/19	11
2019/20	4
2020/21	60
2021/23	17
2022/23	19
Total	111
Annual Average	22

Source: North Somerset Council, 1<sup>st</sup> January 2024 – see Appendix 2

5.3.2 The Council have also provided data on new lets and re-lets to a Parish level:

**Figure 5.3.2 – Annual Average Rented Affordable Housing Lets (2021 – 2023)**

Parish	Re-Lets	New Lets
Yatton	12	12

Source: North Somerset Council, 1<sup>st</sup> January 2024 – see Appendix 2

5.3.3 Data on re-sales of Affordable Housing over the last three years has been provided to the Council by Registered Providers operating in Yatton Parish:

**Figure 5.3.3 – Re-Sales of Affordable Housing**

	2020/21	2021/22	2022/23	2023/24
Yatton	1	-	-	1

Source: North Somerset Council, 1<sup>st</sup> January 2024 – see Appendix 2

The above re-lets and re-sales are not confirmed as being net of transfers within the Parish i.e. transfers will not provide additional housing stock when factoring in Affordable Housing supply from existing sources against the projected need for Affordable Housing.

Need / Supply Comparison

- 5.3.4 When considering how much Affordable Housing the Council's planned overall housing supply in Yatton Parish is likely to provide it is necessary to bear in mind that different Affordable Housing proportions are proposed for Previously Developed land ("PDL") and Greenfield land ("GF") – emerging Policy DP43 seeks 20% from eligible PDL sites and 38.5% from eligible GF sites.
- 5.3.5 For the purposes of the following exercise it is assumed that all allocated sites deliver Affordable Housing / policy compliant levels of Affordable Housing, which is unlikely given that the Dixon Searle Viability Assessment for North Somerset Local Plan 2039, Final Report, November 2023 suggests the Affordable Housing targets are unviable. Furthermore, site size thresholds are assumed to preclude the delivery of Affordable Housing from the assumed windfall allowance which is based on past trends in housing delivery from small sites.
- 5.3.6 The Yatton Parish Affordable Housing need projected over a 15 year period based on demographic modelling undertaken by Pioneer and affordability conclusions in the LHNA23 (summarised in Section 5.2 of this report) can be compared to the supply of overall housing planned through Policy LP2 / Schedule 1 (excluding small site windfalls due to site size thresholds). This enables consideration of the ability of the overall proposed housing distribution to assist with meeting Affordable Housing need arising in Yatton Parish:

**Figure 5.3.4 – Affordable Housing Need as a % of Overall Planned Housing Supply**

Parish	Emerging Policy SP08 Overall Housing Distribution	Emerging Policy LP2 / Schedule 1 Overall Housing Allocations	Projected Range of Affordable Housing Need over 15 Yrs	Affordable Housing Need as a % of Policy SP08 Overall Planned Housing Distribution	Affordable Housing Need as a % of Policy LP2 Overall Planned Housing Allocations
<b>Yatton</b>	n/a	231	352 to 818	n/a	152% to 354%

Source: Pioneer March 2024 (for projected Affordable Housing need see sub-section 5.2 in this report) – supply excludes 90nr. small site windfalls due to Affordable Housing site size thresholds

*NB: All outputs subject to rounding*

- 5.3.7 It can be noted that Yatton Parish will have insufficient housing land allocations for the range of projected Affordable Housing need to be addressed at the target levels of Affordable Housing set through emerging Plan Policy i.e. even if all of the proposed housing land allocations in Yatton Parish were delivered as Affordable Housing this would still be insufficient to address the projected housing need.
- 5.3.8 A further way of considering the impact of the planned levels of overall housing supply on the ability to address Affordable Housing need is to look at what likely shortfalls in Affordable Housing provision are likely to accrue against the proposed planned distribution / allocation of housing land across Yatton Parish and having regard for the potential supply of Affordable Housing from re-lets / re-sales of existing stock (albeit this source is not confirmed as being net of transfers within the Parish i.e. transfers will not provide additional housing stock).
- 5.3.9 The 2023 Dixon Searle viability evidence underpinning the emerging local plan concludes that c.30% Affordable Housing should be viable in locations such as Yatton Parish (reducing to 20% on PDL) – as already noted this suggests that the Affordable Housing targets in Policy DP43 are aspirational and unlikely to be deliverable.
- 5.3.10 If the Dixon Searle viability conclusions are applied in broad terms to the proposed planned distribution / allocation of housing land across Yatton Parish (excluding small site windfalls due to site size thresholds) and a potential supply from existing Affordable Housing re-lets / re-sales is taken account of, the following surplus / shortfalls in Affordable Housing are suggested:



**Figure 5.3.5 – Projected Affordable Housing Need / Supply Comparison**

Parish	Projected Range of Affordable Housing Need 2024 - 2039	Affordable Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations (which ever is the highest) assuming Dixon Searle Viability Outcomes*	Estimated Re-lets Over 15 Years Based on Past Trends	Estimated Re-Sales Over 15 Years Based on Past Trends	Shortfall / Surplus in Affordable Housing 2024 to 2039
Yatton	352 to 818	69	175	8	-99 to -565

Source: Pioneer March 2024 (see Figure 5.2.1 in this report for Projected Affordable Housing need, Figures 5.3.2 and 5.3.3 for past trends in re-lets / re-sales and Figure 4.3.1 for planned overall housing supply to which Dixon Searle viability outcomes are applied).

NB: All outputs subject to rounding, **a minus figure equals a shortfall**

\*Assumes 30% Affordable Housing in locations such as Yatton

The above assumes 30% Affordable Housing delivery in Yatton Parish and that that no sites will have viability constraints (over and above those concluded in the Council’s evidence base) justifying a lower level of Affordable Housing provision. The above outputs do not take into account unmet current Affordable Housing need and the lower end of the range of the above surplus / shortfall does not take account of all households eligible for Affordable Home Ownership. Additionally, the supply from re-lets / re-sales is not confirmed as being net of transfers within the Parish i.e. such transfers will not provide additional housing stock available to meet increases in Affordable Housing need.

‘Top Down’ Affordable Housing Need / Planned Supply Comparison

5.3.11 The LHNA23 does not provide Affordable Housing need outputs at a sub-area level, but in addition to projecting Affordable Housing need based on demographic modelling an indication of Affordable Housing need arising in Yatton Parish studied in this report has also been estimated using LHNA23 based Affordable Housing need outcomes for North Somerset as a whole (the Parish level Affordable Housing need assessed as a result of process is summarised in sub-section 5.1 / Figure 5.1.3 above and already takes account of Affordable Housing supply through re-lets / re-sales).

5.3.12 When compared to an estimated supply of Affordable Housing based on the Dixon Searle viability conclusions and overall planned housing supply (using the proposed planned distribution / allocation of housing land across Yatton Parish) the following surplus / shortfalls in Affordable Housing are suggested:

**Figure 5.3.6 – ‘Top-Down’ Affordable Housing Need / Planned Supply Comparison**

Parish	Affordable Housing Need - LHNA23 based Range (2024-2039 or 15yrs)		Affordable Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations (which ever is the highest) assuming Dixon Searle Viability Outcomes*	Shortfall / Surplus in Affordable Housing 2024 to 2039
	Constrained 'Policy-on'	All Eligible Hholds		
<b>Yatton</b>	210	to 481	69	-141 to -412

Source: Pioneer March 2024 (see sub-section 5.1 Figure 5.1.3 in this report for LHNA23 based Affordable Housing need and Figure 4.3.1 for planned overall housing supply to which Dixon Searle viability outcomes are applied).

NB: All outputs subject to rounding, **a minus figure equals a shortfall**

\*Assumes 30% Affordable Housing in Yatton Parish

5.3.13 The above assumes 30% Affordable Housing delivery in Yatton Parish and that that no sites will have viability constraints (over and above those concluded in the Council’s evidence base) justifying a lower level of Affordable Housing provision. The lower end of the range of the above shortfall does not take account of all households eligible for Affordable Home Ownership and the upper end of the range of the shortfall will be primarily comprised of a need for AHO (given that this is the majority of the need in this scenario and planned supply is likely to contain more Affordable Housing for rent than sale).

## **6 SUMMARY AND CONCLUSION**

### **Overview**

6.1 This report, prepared by Pioneer Property Services Ltd on behalf of Persimmon Homes (Severn Valley) Limited and in support of a planning application for 190 new homes, draws on the Council's evidence base and other secondary data sources to provide an assessment of market and Affordable Housing need (in terms of quantum, tenure and mix) within the Parish of Yatton.

### **Housing Quantum**

6.2 Significant uncertainty regarding the progress, timing and overall soundness of the emerging Local Plan could substantially undermine the overall supply of market and affordable housing proposed between 2024 and 2039 can realistically be delivered.

6.3 There is a pressing need for the overall housing requirement to be increased beyond the 321 (inclusive of c.90 windfall homes) proposed by the emerging Local Plan within Yatton Parish between 2024 and 2039.

6.4 Based on Pioneer's analysis the requirement in Yatton Parish for market housing is suggested to be c.2.6 times the supply planned through the emerging Local Plan and a shortfall of c.399 market homes could accrue in Yatton Parish unless additional supply sources are identified over the 2024 to 2039 period.

6.5 If overall housing supply remains at the level proposed through the emerging Local Plan significant shortfalls of up to 565 Affordable Homes could accrue in Yatton Parish 2024 to 2039.

6.6 Even if Affordable Housing need is constrained to exclude a significant number of households eligible for Affordable Home Ownership ("AHO"), at minimum shortfalls of c.99 Affordable Homes could accrue. Existing backlogs in unmet Affordable Housing need suggest this lower shortfall scenario to be an optimistic outcome with c.985 households waiting for Affordable Housing selecting Yatton Parish as a location in which they would accept a home.

6.7 The latest 2022 Mid-year population estimates suggest population increases at a local authority level and Parish level between 2021 and 2022 which are likely to result in increases, as opposed to decreases, in projected households / housing demand particularly in Yatton

Parish which is suggested to have seen increases between 2021 and 2022 significantly in excess of those across North Somerset.

### **Housing Mix**

- 6.8 The existing characteristics of owner occupier housing in Yatton Parish suggest that the primary focus for additional market housing should be on providing 3 bedroom family housing whilst also increasing the proportion of entry level market homes - this approach will improve the availability of both entry level and family housing and therefore contribute towards meeting the need for homes in Yatton Parish.
- 6.9 Affordable Housing need (current unmet and projected) suggests that provision in Yatton Parish should primarily be focused on the provision of 1 and 2 bedroom homes.

### **Affordable Housing Tenure**

- 6.10 LHNA23 North Somerset level outputs suggest that Affordable Housing should include a significant proportion of AHO. In view of: increased affordability challenges faced by eligible households aspiring to home ownership within Yatton Parish compared to North Somerset; the constrained availability of existing AHO housing stock (both in the Parish and in North Somerset) and the demographic similarities between the Parish and the wider local authority area the LHNA23 tenure split range (i.e. between 27% excluding a significant number of households eligible for AHO and up to 68% including all households aspiring to AHO) can reasonably be applied in Yatton Parish.

### **Location Context**

- 6.11 As part of the process of assessing housing need at a sub-area level a review of demographic and other local characteristics has been undertaken using data at a Parish, Lower Layer Super Output Area, and Ward level. This suggests that the proportion of population growth in Yatton Parish (at 6.9%) has been broadly similar to that across North Somerset as a whole (at 7%) for the 2011 to 2021 intercensal period.
- 6.12 The latest 2022 Mid-year population estimates suggest population increases at a local authority level and Parish level between 2021 and 2022 which are likely to result in increases, as opposed to decreases, in projected households / housing demand particularly in Yatton Parish which is suggested to have seen increases between 2021 and 2022 significantly in excess of those across North Somerset.

- 6.13 The 2021 Census data suggests that Yatton Parish has a broadly similar population age profile to North Somerset, with 52% and 51% of people being aged 45+ in each respective location and with the same proportion of older single person / couple households (at 28%). The age profile suggests a need to attract / retain working age households with entry level and family housing, but the substantial proportion of people aged 45+ means there is likely to be a demand for additional larger market family market housing as the population ages should older person owner occupiers choose to remain in the family home thus not releasing this type of housing back into the market.
- 6.14 In terms of tenure 2021 Census data records that only c.10% of the overall housing stock in North Somerset and in Yatton Parish is Affordable Housing with the majority of homes (c.79%) in owner occupation. Whilst 11% of the total Affordable Housing stock in Yatton Parish is Shared Ownership (compared to 7% across North Somerset) numerically this is still only 46 homes – the Affordable Housing stock remains strongly skewed towards Affordable Housing for rent (of which 369 homes were recorded in the 2021 Census).
- 6.15 Based on 2021 Census data the mix of existing Owner Occupier housing stock in Yatton, whilst broadly similar to that across North Somerset, contains c.42% four bedroom homes compared to c.36% across North Somerset and fewer entry level homes with only 13% of owner occupier homes having two bedrooms compared to c.20% across North Somerset.
- 6.16 Affordable Housing is predominantly comprised of 1 to 3 bedroom homes with Yatton suggested to have a slightly higher proportion of three bedroom homes than North Somerset.
- 6.17 Affordability is likely to be more challenging within Yatton than in North Somerset on average, with a median house price to income ratio (at 12.5) exceeding the average for North Somerset (at c.10) and the average for England (at 8.3).

### **Policy Context**

- 6.18 That housing is a material consideration of significant importance is evident from the fact that, for many years, its delivery has been prioritised within National Planning Policy. The NPPF includes the clear objective of 'significantly boosting the supply of homes' and confirms that the 'minimum number of homes needed' should be informed by a local housing need assessment using the Standard Method unless exceptional circumstances apply.

- 6.19 The NPPF sets out that the need for different types, sizes and tenures of housing should be assessed and policy should reflect this, specifically in respect of Affordable Housing where a need for it is established.
- 6.20 Whilst, based on the NPPF, affordable housing policies should specify the type of affordable housing needed, it is inherent in national planning policy and guidance (given the lack of direction to the contrary) that any approach to market mix should remain flexible when considering development proposals.
- 6.21 The imposition of rigid market mix requirements would have a negative impact on the ability to realise opportunities to meet development needs in the life of a Plan or during the development of a site and would remove the ability to adapt rapidly to changes in market housing demand within specific locations and across local authority areas as a whole.
- 6.22 Whilst there is no specific legislative requirement to deliver First Homes, additional footnoted text in the NPPG Affordable Housing definition, the First Homes Planning Guidance (“FHG”) and an accompanying Written Ministerial Statement (“WMS”) demonstrates the Government’s commitment to increasing the opportunities for Affordable Home Ownership.
- 6.23 The North Somerset Core Strategy (“CS”) Policy CS13 (re-adopted in 2015) plans for a supply of 20,985 homes overall across North Somerset during 2006 to 2026 (20 years) or c.1,049 per annum. Policy CS32 (adopted in 2017 following re-examination) defines Yatton as a Service Village alongside other settlements (such as Backwell) and Policy CS14 (adopted in 2017 following re-examination) distributes 2,100 homes across all of the Service Villages combined (which includes Yatton).
- 6.24 Set against a planned overall housing supply of 1,049 per annum extant Plan policy in North Somerset targets the delivery of only 150 (c.14%) Affordable homes per annum. However, 150 per annum equates to only c.18% of the overall unconstrained Affordable Housing need from households suggested in the North Somerset Local Housing Needs Assessment (October 2023) (“LHNA23”) Figure 51 (at 843 per annum over 15 years) and c.41% of the ‘policy-on’ constrained Affordable Housing need from households in LHNA23 paragraph 4.72 (at 368 per annum over 15 years). Furthermore, Housing Land Supply data published by the Council in March 2023 covering the 2022 to 2027 period states that there is a 3.5 year housing land supply suggesting that the levels of both market and Affordable Housing are failing to address the assessed local housing need across North Somerset.

- 6.25 The Pre-submission (reg 19) Autumn 2023 (“Local Plan 2039”) at page 12, responding to Government Guidance, is explicit that one of the Strategic Priorities is to: *“To deliver a diverse range of housing in a variety of tenures, sizes and forms, particularly genuine affordable housing, to meet future needs of North Somerset residents at locations where they are most needed”*.
- 6.26 Within the ‘Local Plan 2039’ emerging Policy SP8 plans for ‘a minimum’ of 14,902 homes overall during 2024 to 2039, with the bulk of provision focussed in the environs of Weston-Super-Mare. Policy LP2 and Schedule 1 sets out the proposed residential site allocations elsewhere which include 231 homes across Yatton Parish (in Yatton and Claverham) which falls within a ‘villages and rural area’. A further supply from small windfall sites is also assumed in the Local Plan 2039 across the ‘villages and rural area’. Although this is not broken down by settlement within the Local Plan 2039, the Spatial Strategy and capacity paper (November 2023 – “SSCP”) suggests a total of c.90 such windfall dwellings within Yatton Parish. These small windfall sites are unlikely to deliver Affordable Housing.
- 6.27 Emerging Policy DP43 seeks 38.5% Affordable Housing on eligible Greenfield sites and 20% on eligible previously developed land (“PDL”) - 25% of this Affordable Housing is sought as First Homes, with the remaining 75% split as 90% Social Rent and 10% Shared Ownership, or in a 77% Social Rent and 23% Shared Ownership split where First Homes is not provided. However, the 2023 Dixon Searle viability evidence suggests that the targets for Affordable Housing quantum in Policy DP43 are unlikely to be deliverable, with a maximum of 30% Affordable Housing being likely to be viable in locations such as Yatton Parish (reducing to 20% on Previously Developed Land).
- 6.28 Whilst Yatton Parish has a made Neighbourhood Plans (“NHP”) in place this allocates only a single site for residential development and does not contain policies specifically in respect of Affordable Housing provision.

### **Quantum of Housing Needed**

#### *Market Housing*

- 6.29 The North Somerset Local Housing Needs Assessment (October 2023) (“LHNA23”) does not provide sub-local authority area level conclusions on market or Affordable Housing need. In this regard, not only is the basis of the overall housing planned across different sub-areas within emerging Policies SP08 and LP2 / Schedule 1 of the draft Local Plan unclear, but there

is also no clear understanding of the levels of market housing need likely to arise within Yatton Parish. This means that the levels of market and Affordable Housing that will be provided may fall significantly short of the amount required.

- 6.30 In the absence of any sub-area level assessment within the LHNA23 or within an assessment underpinning the Yatton NHP, demographic projections which reflect differences in population distribution in terms of age and sex at a sub-area level compared to across the wider district have been prepared by Pioneer and suggest a requirement for c.930 homes over a 15 year period in Yatton Parish. This has been used to consider the likely amount of market housing that will be required in Yatton Parish.
- 6.31 To consider how much of the 930 projected overall housing need in Yatton Parish is likely to be needed as market housing it is relevant to note that the high level 2023 Dixon Searle viability evidence underpinning emerging Local Plan policy suggests 30% Affordable Housing to be viable in locations such as Yatton (reducing to 20% on Previously Developed land (“PDL”)). This suggests that a minimum of c.651 of the 930 projected overall housing need would need to be provided as market housing to enable the viable delivery of Affordable Housing.
- 6.32 Based on a 231 planned overall housing supply excluding 90 small site windfalls (due to Affordable Housing site size thresholds) and the Dixon Searle viability evidence c.69 affordable homes (231 x 30%) could be provided in Yatton Parish during 2024 to 2039. When these Affordable Homes are deducted from the overall planned housing supply a planned supply of 252 market homes (i.e. 231 minus 69 affordable homes, plus 90 windfall dwellings as market housing) is suggested 2024 to 2039 in Yatton Parish.
- 6.33 Based on the analysis within this report, unless additional supply sources are identified, the market housing requirement is c.2.6 times the planned supply of market housing and a shortfall of c.399 market homes could accrue in Yatton Parish over the 2024 to 2039 period.

**Figure 6.1 – Market Housing Need Yatton Parish 2024 – 2039**

Parish	Projected Market Housing Required 2024 - 2039	Maximum Overall Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations	Shortfall / Surplus in Market Housing 2024 to 2039	Projected Market Housing Requirement as a % of Planned Market Housing
Yatton	651	252	-399	258%

Source: Pioneer March 2024 NB: All outputs subject to rounding, a minus figure equals a shortfall



*Affordable Housing*

- 6.34 Whilst households can select multiple locations Housing Waiting List data provided by the Council as at January 2024 suggests that Yatton Parish is selected by a significant number of households (985) as a place in which they would accept rented Affordable Housing. Housing Waiting List data will not include all households able to afford to rent privately but aspiring to purchase a home and unable to afford to do so, nor will it necessarily include all other households waiting for AHO homes or newly arising need. Nevertheless, this data suggests that Yatton is likely to be subject to significant demand pressures for Affordable Housing.
- 6.35 As in respect of the overall North Somerset Local Housing Need (“LHN”), the LHNA23 does not provide sub-local authority area level conclusions on Affordable Housing need. In this regard, not only is the basis of the overall housing planned across different sub-areas within emerging Policies SP08 and LP2 / Schedule 1 of the draft Local Plan unclear, but there is also no clear understanding of the levels of Affordable Housing need likely to arise within key settlements across North Somerset. This means that the levels of Affordable Housing that will be provided based on the planned distribution of housing and emerging Affordable Housing targets (informed by high level Local Plan viability testing) may fall significantly short of the amount required.
- 6.36 Demographic projections have been prepared by Pioneer to consider housing needs in Yatton Parish. This reflects differences in population distribution in terms of age and sex at a sub-area level compared to across the wider district to inform local sub-area level overall housing requirements in order to reach a view of the likely amount of this that will be needed as Affordable Housing.
- 6.37 This demographic projection based sub-area level assessment of Affordable Housing need is in addition to sub-area level ‘top-down’ Affordable Housing need estimates prepared by Pioneer using LHNA23 based Affordable Housing need outcomes for North Somerset as a whole and which assume that this need arises at a proportionate rate within Yatton Parish.
- 6.38 These demographic (2021 Census informed) and ‘top-down’ LHNA23 based sub-area level Affordable Housing need outcomes can be compared to the supply of Affordable Housing that is likely to be provided as a result of the overall housing planned in Yatton Parish through Policy LP2 / Schedule 1:

**Figure 6.3 – Affordable Housing Need Shortfall / Surplus 2024 – 2039**

Yatton Parish Affordable Housing Need Analysis Scenario:	Estimated Affordable Housing Need 2024 - 2039	Affordable Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations (which ever is the highest) assuming Dixon Searle Viability Outcomes*	Estimated Re-lets / Re-Sales 2024 - 2039 Based on Past Trends	Potential Shortfall / Surplus in Affordable Housing 2024 to 2039	Estimated Affordable Housing Need as a % of Affordable Housing Deliverable 2024 - 2039 Based on Planned Housing Distribution / Allocations
<b>Demographic Projection Based</b>	352 to 818	69	183	-99 to -565	139% to 324%
<b>LHNA23 'Top-Down' Based</b>	210 to 481	69	Already Applied	-141 to -412	303% to 694%

Source: Pioneer March 2024 (see Sections 5.1, 5.2 and 5.3 in this report)

NB: All outputs subject to rounding, **a minus figure equals a shortfall**

\*Assumes 30% Affordable Housing in locations such as Yatton

- 6.39 The Affordable Housing need based on a constrained 'policy-on' Affordable Housing need proportion (i.e. the lower end of the assessed Affordable Housing need range) does not take account of all households eligible for Affordable Home Ownership.
- 6.40 Given the large number (985) of households already on the Housing Waiting List and selecting Yatton Parish as a location in which they would accept Affordable Housing and given the Council's viability evidence base conclusions which suggest that emerging Plan policy Affordable Housing targets are unlikely to be deliverable, it is apparent that demand / supply pressures on Affordable Housing in Yatton Parish are already significant.
- 6.41 Whilst the amount of Affordable Housing that can realistically be planned for is likely to lie somewhere between the constrained and unconstrained Affordable Housing need, analysis suggests that if overall planned housing supply remains at the levels proposed through the emerging Local Plan (which, itself, will require a significant uptick in committed supply to that identified by the Council in the 2022 to 2027 housing land supply) significant shortfalls of up to 565 Affordable Homes could accrue in Yatton Parish 2024 to 2039.
- 6.42 Even if Affordable Housing need is constrained (excluding a significant number of households eligible for AHO) at minimum, shortfalls of c.99 Affordable Homes could accrue and the overall estimated Affordable Housing need is suggested to equate to c.139% of the likely planned supply of Affordable Housing. However, existing backlogs in unmet Affordable Housing need suggest this lower shortfall scenario to be a very optimistic outcome.

### Market Housing Mix

- 6.43 The mix of owner occupier housing stock within the environs of Yatton is suggested by 2021 Census data to be broadly similar to the average across North Somerset, albeit with c.42% four bedroom homes compared to c.36% across North Somerset and a lower proportion (at c.15%) of entry level homes compared to North Somerset (at c.24%).
- 6.44 Some c.80% of market housing need in North Somerset is suggested in the LHNA23 to be for 3 and 4 bedroom housing. Much of this need (51%) is suggested to be for three bedroom housing, although the LHNA23 acknowledges that the housing mix modelling assumptions assume that 481 older person households will move into C2 accommodation. Where such households occupy family open market housing and do not move into C2 accommodation as assumed in the LHNA23 this will result in a significantly larger proportion of family market homes being needed than projected in the LHNA23. There is no sensitivity testing in the LHNA23 of alternative mix scenarios where older person households choose not to vacate their open market homes.
- 6.45 Small changes to underlying assumptions when modelling market housing mix, particularly over a 15 year period, will significantly alter the market housing mix outputs from those within the LHNA23. This lends weight to the position that market housing mix should be informed by a more balanced judgement on housing needs and demands than simply inflexibly imposing a single set of outputs on market housing mix at a site level.
- 6.46 To this end, it is critical to have close regard to the mixes of market housing being sought by developers who will understand the local demand for housing for sale. It is this market knowledge which the Calcutt review alluded to (when setting out that that developers are likely to be the best judge of market housing demand) and is so important when housebuilders are making decisions about what to bring forward. The Calcutt position on this remains just as valid now as when it was published in 2007.
- 6.47 A housebuilder needs to achieve a consistent sales rate on a development to maintain delivery of the scheme and avoid phases stalling as demand falls behind production. This constant balancing of demand and supply is critical to the business model of the housebuilder and failure to achieve the correct relationship will threaten scheme delivery and commercial viability.
- 6.48 Buyer behaviour in the market place is driven by a number of factors and some of these will tend to move their approach away from what might be reasonably modelled in an exercise

such as the LHNA23. Firstly there is an economic input in terms of the buying power of individuals in the open market. Many households opt to consume more housing than they technically 'need'. This is the case for older households who don't take up (or delay) the decision to downsize their accommodation as children leave home but equally this is the case for households moving up the housing ladder.

- 6.49 Any constraint on purchaser choice by the under provision of larger homes fails to understand market housing purchase dynamics. The pressures that such a 'policy-on' approach will place on the existing stock of larger family housing cannot be ignored and additional provision (not less) should, therefore, be planned to meet demand.
- 6.50 It is important to highlight that these factors are very distinct from the affordable housing sector (particularly rented) where occupation of homes will more closely reflect 'need' because the households are 'allocated' according to rules which closely match household size to bedroom count.
- 6.50.1 In this context, and having regard to the LHNA23 conclusions for North Somerset on market mix (and its assumptions on how older people will occupy their homes) and the existing characteristics of owner occupier housing in Yatton Parish, the primary focus should be on providing 3 bedroom family market housing whilst also increasing the proportion of entry level market homes above the c.15% recorded in the 2021 Census to improve the availability of both entry level and family housing in the Parish. Taking this approach will contribute towards meeting the need for homes in Yatton Parish.

#### **Affordable Housing Tenure Split**

- 6.51 Based on the NPPF Affordable Housing definition and the NPPG (and as acknowledged at paragraph 4.4 of the LHNA23) all households able to afford market rents but aspiring to home ownership and unable to afford to buy are eligible for Affordable Housing; further affordability testing is not required to derive the overall need for Affordable Home Ownership ("AHO").
- 6.52 The full objective Affordable Housing need breaks down in the LHNA23 into a tenure split requirement across North Somerset for 68% AHO and 32% other forms of affordable housing. However, the LHNA23 uses a constrained 'policy-on' overall Affordable Housing outcome (which limits the need for AHO using a non-NPPF / non-NPPG informed methodology) to suggest a tenure split of c.27% AHO and 73% other forms of affordable housing.

- 6.52.1 When adjustments are made to the LHNA23 constrained 'policy-on' scenario to factor in that i) a number of households eligible for Affordable Housing will source a deposit / other funds from family and parents (as opposed to from savings) and that ii) a further number of households unable to afford market rents, in need of affordable housing and aspiring to buy will be able to afford AHO, a c.50% Affordable Home Ownership and 50% rented affordable housing tenure split is suggested in North Somerset.
- 6.53 In the context of the overwhelming requirement for AHO across North Somerset suggested by the LHNA23 full objective assessment of Affordable Housing need and Government objectives to increase opportunities for home ownership, the provision of additional Affordable Housing as AHO is much needed to assist the Council with making meaningful inroads into meeting a full range of Affordable Housing need. Where Affordable Housing is provided as First Homes a review of data within the LHNA23 suggests that provision in line with nationally set discounts to open market value will assist with addressing the needs of a significant proportion of households for whom this will be affordable.
- 6.54 Whilst sub-area outputs are not presented in the LHNA23, unless a sub-area enjoys improved affordability / significant proportions of existing AHO stock compared to North Somerset averages, then it is reasonable to suggest that affordable housing should be provided in a similar split to that across the local authority area. Affordability within in parts of Yatton is suggested to be more challenging than across North Somerset on average.
- 6.55 As such, Yatton Parish, which contains very limited existing AHO housing stock (11% of all Affordable Housing based on 2021 Census data), will benefit from the provision of a significant proportion of AHO as part of any new Affordable Housing supply – based on a review of the tenure split range within the LHNA23 lies between 27% and 68% of any Affordable Housing proposed, albeit the lower end of the range will not address the full need for AHO from eligible households.

### **Affordable Housing Mix**

- 6.56 It is apparent from the Housing Waiting List that there is a significant backlog of unmet need for one and two bedroom rented Affordable Housing in North Somerset (2,078 households equating to c.83% of the whole waiting list) and that little headway has been made in tackling this over recent years. Numerically this need dwarfs the need for 3 and 4 bedroom rented Affordable Housing.

- 6.57 Housing Waiting List data in respect of Affordable Housing for rent provided by the Council at a Parish level broadly suggests that up to 82% of all selections made by households across Yatton Parish are for one and two bedroom rented Affordable Housing.
- 6.58 The Affordable Housing mix proportions concluded in Figure 52 of the LHNA23 for North Somerset, particularly in the absence of sub-area level outputs, should be applied flexibly in terms of dwelling size or type at a site level.
- 6.59 Having regard to housing mix analysis undertaken by Pioneer for Yatton Parish, existing stock profiles and the existing data within the LHNA23 for North Somerset, proposing up to c.80% of additional rented Affordable Housing with one and two bedrooms alongside a remaining proportion of 3 bed and / or larger family homes would be reasonable approach for the delivery of rented Affordable Housing in Yatton Parish.
- 6.60 For AHO, given the lack of transparency in the LHNA23 on how the mix / type conclusions are arrived at, in the wider context of trends in demand from First Time Buyers, to optimise affordability (which is more challenging in Yatton than in North Somerset on average), having regard to preferences generally expressed by Registered Providers and in the context of the profile of existing Affordable Housing stock, providing an AHO mix that includes c.70% 2 bedroom (predominantly houses) and c.30% 3 bedroom houses represents a reasonable approach for AHO delivery in Yatton Parish.
- 6.61 In summary, subject to site specific constraints and objectives, it will be reasonable in Yatton Parish for overall Affordable Housing mix proposals to comprise predominantly (c.80%) of 1 and 2 bedroom homes, albeit with a focus within this on two bedroom accommodation and noting likely AHO purchaser preferences for 2 and 3 bedroom houses as opposed to apartments.

### **Overall Summary**

- 6.62 Based on the analysis within this report, unless additional supply sources are identified, the 2024 – 2039 market housing requirement is c.2.6 times the planned supply of market housing and a shortfall of c.399 market homes could accrue in Yatton Parish over the 2024 to 2039 period.
- 6.63 Analysis also suggests that if overall planned housing supply remains at the levels proposed through the emerging Local Plan significant shortfalls of up to 565 Affordable Homes could accrue in Yatton Parish 2024 to 2039. Even if Affordable Housing need is constrained

(excluding a significant number of households eligible for AHO) at minimum, shortfalls of c.99 Affordable Homes could accrue and the overall estimated Affordable Housing need is suggested to equate to c.139% of the likely planned supply of Affordable Housing. However, existing backlogs in unmet Affordable Housing need (with c.985 households already on the Housing Waiting List and selecting Yatton Parish as a location in which they would accept Affordable Housing) suggest this lower shortfall scenario to be an optimistic outcome.

- 6.64 It is apparent that providing a range of 1, 2, 3 and 4 bedroom homes for market and Affordable Housing will assist with addressing housing demand and need within Yatton Parish. The existing characteristics of owner occupier housing in Yatton Parish suggest that the primary focus for additional market housing should be on providing 3 bedroom family housing whilst also increasing the proportion of entry level market homes - this approach will improve the availability of both entry level and family housing and therefore contribute towards meeting the need for homes in Yatton Parish.
- 6.65 Affordable Housing need (current unmet and projected) suggests that provision in Yatton Parish should primarily be focused on the provision of 1 and 2 bedroom homes alongside a remaining element of 3 bedroom or larger family homes and include a significant proportion of AHO (between 27% and 68%) in view of the affordability challenges faced by eligible households aspiring to home ownership within Yatton Parish.
- 6.66 There is a pressing need for the overall housing requirement in Yatton Parish to be increased beyond that currently planned for if shortfalls in both market and Affordable Housing provision during 2024 to 2039 are to be reduced and existing backlogs in Affordable Housing need are to be addressed.

## 7 APPENDICES

### Appendix 1 – Analysis of LHNA23 North Somerset Affordable Housing Need

#### Tenure

- 7.1 There is no assessment in the North Somerset Local Housing Needs Assessment Report of Findings (October 2023) (“LHNA23”) of how many of the 4,058 households assessed as unable to afford a market rent and in need of affordable housing (i.e. the more ‘traditional’ source of Affordable Housing need prior to the widening of the NPPF Affordable Housing definition) could afford and aspire to affordable home ownership – a proportion of these (particularly those able to afford Affordable Rent without Housing Benefit<sup>57</sup> – Figure 44 and paragraph 4.39 suggest 1,219 such households – see ‘NB’ at the end of this sub-section) may also be able to afford Shared Ownership or other affordable home ownership products at varying discounts to open market value (“OMV”).
- 7.2 In particular, these households are likely to have incomes that range across the Affordable Rent / Private Sector Rent housing costs ‘gap’; i.e. they may have incomes in excess of those needed to afford the Affordable Rent housing cost threshold, but just below those needed to afford the Private Sector Rent housing cost threshold. Based on data in the LHNA23 it can be seen that a proportion of households in this gap could potentially afford various Affordable Home Ownership options:

**Figure 7.1 – Housing Costs Comparison**

Beds	Social Rent	Affordable Rent	Median PRS	10% Equity Share	50% First Homes / Discounted Market Sale	60% First Homes / Discounted Market Sale
1	82.63	111.75	136.84	124.86	106.86	128.23
2	94.70	123.00	172.48	157.41	137.14	164.57
3	107.42	139.69	212.73	204.46	180.92	217.1
4	122.00	154.89	298.97	271.96	243.72	292.46

Social Rent and Affordable Rent Housing Costs based on Figure 24 LHNA23 and assuming costs = 35% of income as per LHNA23, PRS Housing Costs based on Figure 31 LHNA23, Affordable Home Ownership Housing Costs based on Figure 34 of the LHNA23 NB: red box indicates housing costs that exceed the median PRS housing costs, green boxes are below median PRS housing costs

- 7.3 Even if only half of the 1,219 households (i.e. c.610) in Affordable Housing need suggested to be able to afford Affordable Rent without Housing Benefit aspire to Home Ownership but

<sup>57</sup> Paragraph 4.39, LHNA23



cannot afford it, added to the 1,347 households requiring Affordable Home Ownership in the LHNA23 constrained 'policy-on' scenario, this suggests that 35% of the households would require Affordable Home Ownership (i.e.  $1,347 + 610 = 1,957$  divided into 5,521 households needing Affordable Housing) compared to the 27% suggested by the LHNA23 at page 56.

- 7.4 In arriving at its constrained 'policy-on' conclusions on households needing Affordable Housing the LHNA23 deducts 3,169 households unable to afford 50% of lower quartile newbuild house prices on the basis that these could not afford the cheapest Affordable Home Ownership product that is likely to be available (see Figure 34 of the LHNA23) and a further 3,956 households on the basis that they have savings of less than £5000. This analysis is described as drawing on household incomes and savings in the Private Rented Sector informed by the English Housing Survey,<sup>58</sup> but the background data used and the methodology by which it is updated is not presented for scrutiny.
- 7.5 The English Housing Survey last issued data on savings amounts held by private renters in 2017/18 (broken down by no savings, up to £15,999 and £16k or more). This was not cross tabulated against income bands or quintiles. As such, it is unclear how the savings and income data has been cross tabulated by ORS against aspirational purchaser Private Renter households to ensure the deductions in each category (i.e. unable to afford 50% / savings less than £5k) do not double count one another thus artificially restricting the number of such households included in the constrained 'policy-on' assessment of Affordable Housing need.
- 7.6 The savings assumption in the LHNA23 is tenuous; the English Housing Survey 'Housing Costs and Affordability, 2018-19' states in paragraph 1.26 that:
- “...34% of first time buyers reported that some of their deposit was sourced from their parents or family, compared to just 8% of previous purchasers. The reliance on familial financial support for first time buyers has increased across the 10 years: with 22% reporting a family loan or gift to help with deposit in 2008-09.”*
- 7.7 Based on the English Housing Survey findings for First Time Buyers it could reasonably be assumed that c.34% of those households that the LHNA23 purports to have savings of less than £5k may in practice source this money from parents or family members. This would mean a further 1,345 households being able to afford an Affordable Home Ownership product (i.e.  $3,956 \times 34\%$ ) suggesting a constrained 'policy-on' total of 2,808 households<sup>59</sup> able to afford

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<sup>58</sup> Paragraph 4.62, LHNA23

<sup>59</sup> 1,345 plus 1,463

market rents requiring Affordable Home Ownership (albeit it does not resolve the potential for duplicate deductions). In the LHNA23 constrained 'policy-on' scenario, applying this adjustment suggests that c.41% of the households would require Affordable Home Ownership (i.e. 2,808 divided into 6,866<sup>60</sup> households needing Affordable Housing) compared to the 27% suggested by the LHNA23 at page 56.

- 7.8 Furthermore, if as explored above, a further c.610 households unable to afford market rent, but able to afford Affordable Rent without Housing Benefit and aspiring to Home Ownership and unable to afford it are also included this suggests c.3,418 households<sup>61</sup> requiring Affordable Home Ownership. In the LHNA23 constrained 'policy-on' scenario, this further adjustment suggests that c.50% of the households would require Affordable Home Ownership (i.e. 3,418 divided into 6,866 households needing Affordable Housing).

#### *First Homes*

- 7.9 Paragraph 4.85 of the LHNA23 suggests that First Homes should be provided at a 'at least 50%' discount to market values as a starting point. However, the LHNA23 does not robustly justify this approach. Indeed, the LHNA23 presents data in Figure 52 which suggests an 'at least 30%' discount is an appropriate starting point given that 58% of dwellings provided at this discount would be affordable to eligible households needing AHO.<sup>62</sup>
- 7.10 Crucially, the FH NPPG discount levels all include 'at least' in the wording hence it is possible to apply discounts of at least 30% - this is a minimum not a maximum. The LHNA23 suggests the majority of households (58%) included in need of AHO can afford a 30% level of discount. Starting at 50% would over subsidise such households – this will impact of scheme economics possibly at the expense of other infrastructure / other affordable housing and it is also unclear that planning obligations which over subsidise in this way would be justified in the context of CIL Regulation 122 / paragraph 57 of the NPPF. Unless nil or a very limited proportion of eligible households can afford the 'at least 30%' position (and the LHNA23 suggests the opposite) then including a higher discount starting position within policy is not justified on a housing needs basis.

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<sup>60</sup> 5,521 plus 1,345

<sup>61</sup> 2,808 plus 610 – see paragraph 5.2.7 for the latter

<sup>62</sup> 858 households able to afford AHO at 30% discount divided into 1471 households needing AHO in the LHNA23 constrained 'policy on' Affordable Housing need

Quantum

7.11 When considering either the policy off or constrained policy on Affordable Housing need outputs within the LHNA23 it should further be considered that:

- Figure 44 of the LHNA23 (informing the need for rented Affordable Housing in Figure 52 which factors in a vacancy rate) assumes that the backlog / current need from 1,240 households<sup>63</sup> will be met over a period of fifteen years. However, this will see households who have already been waiting for Affordable Housing waiting even longer and fails to seek to address this pressing unmet current Affordable Housing need over a shorter period (5 years would be a more equitable timeframe in alignment with the housing land supply period).
- The LHNA23 does not include owner occupiers in overcrowded housing in the backlog need for Affordable Housing (paragraph 4.13). However, it should not be assumed that i) all of these households can resolve their overcrowding by moving in the open market and ii) it may be that households are overcrowded due to non-dependent occupants who need to move now into their own home but cannot afford to do so. These people will need Affordable Housing and single people will not be counted under the concealed families included by the LHNA23 based on the definition in paragraph 4.14.
- The LHNA23 does not include people occupying insanitary housing / living in unsatisfactory housing conditions as being in need of Affordable Housing on the basis that housing these households in new Affordable Housing will result in their existing unsuitable homes becoming available for other households to live in subjecting these households to the same problems (paragraph 4.16). However, it is inequitable to suggest these households should have to remain in insanitary unsuitable homes to prevent their unsuitable housing becoming available for anyone else. The backlog need from these households should be included if they are unable to afford an alternative suitable home on the open market; rehousing such households should be a priority.

7.11.1 Where the LHNA23 is adjusted to reflect these additional points, this will result in an increased level of overall Affordable Housing need within either the policy off or constrained 'policy-on' LHNA23 outputs.

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<sup>63</sup> Figure 43, LHNA23



**Appendix 2 – Housing Waiting List / Supply Letter from North Somerset Council  
Dated 2<sup>nd</sup> January 2024**

**Date:** 02/01/24  
**My ref:** Corresp28Nov23  
**Contact:** Kevin Stamper



**Email:** Kevin.stamper@n-somerset.gov.uk

Placemaking & Strategy  
 Place Directorate  
 North Somerset Council  
 Town Hall  
 Walliscote Grove Road  
 Weston-super-Mare  
 BS23 4EJ

Dear Zoe

In relation to your e-mail dated 28 November 2023 please find below the following responses to your queries:

1. How many households are recorded as currently waiting for rented affordable housing in the following areas and what sizes of dwellings are they seeking:

Area of Preference	Property Type								Total
	Family			Non-Family			Sheltered		
	2	3	4+	1	2	3+	1	2	
<b>Whole Register</b>	628	352	159	854	172	20	477	35	<b>2697</b>
<b>Backwell</b>	191	111	50	356	56	6	151	8	<b>929</b>
<b>Clevedon</b>	225	131	55	407	64	6	178	6	<b>1068</b>
<b>Nailsea</b>	187	111	42	354	50	7	150	9	<b>910</b>
<b>Portishead</b>	215	121	50	393	64	6	187	9	<b>1041</b>
<b>Weston-Super-Mare</b>	404	227	93	581	105	16	264	19	<b>1698</b>
<b>Yatton</b>	208	123	52	373	57	6	156	10	<b>985</b>
<b>Nb. Applicants can select multiple areas of preference, and do not indicate a "first choice".</b>									

2. Please are you able to provide any information in respect of how many households are seeking an Affordable Home Ownership home in the following areas and what sizes of dwellings are they seeking:

Answer: Information not available as we don't keep a central register on Affordable Home Ownership. Each Registered Provider we work with maintains a waiting list for this model.

3. How many new affordable homes (net of any losses through sales etc) by tenure, size and location have been delivered in each of the above Parishes in the last 5 years?

The information below is based on the number of completed/built Affordable Housing dwellings over the period from 2018 to March 2023. Property details for 2022/2023.

Year	Number of AH Delivered
2018/19	96
2019/20	75
2020/21	91
2021/22	193
2022/23	404

SRT		ART		Intermediate	
1 bed	35	1 bed	18	1 bed	19
2 bed	125	2 bed	67	2 bed	50
3 bed	50	3 bed	13	3 bed	28

Year	Total Number AH units completed in Yatton	Total Number AH units completed in Clevedon	Total Number AH units completed in Backwell & Nailsea	Total Number AH units completed in Portishead	Total Number AH units completed in W-S-M	Total Number AH units completed in other Parishes	Total Number AH units completed
2018/19	11	0	0	0	36	35	82
2019/20	4	0	0	19	8	44	75
2020/21	60	0	0	54	15	21	150
2021/23	17	0	18	8	99	80	222
2022/23	19	2	16	135	196	32	400
Total	111	2	34	216	354	212	929

4. How many Affordable Housing re-lets there have been in each of the above Parishes over the last three 12-month periods (i.e., 3 years)?

Area of Preference	2021			2022			2023		
	Re-Lets	New Lets	TOTAL	Re-Lets	New Lets	TOTAL	Re-Lets	New Lets	TOTAL
Whole Register	423	85	508	437	168	605	326	143	469
Backwell	8	5	13	7	9	16	5	0	5
Clevedon	19	0	19	29	2	31	27	0	27
Nailsea	30	0	30	37	5	42	23	17	40
Portishead	40	0	40	46	13	59	42	58	100
Weston-Super-Mare	215	15	230	240	40	280	150	3	153
Yatton	19	6	25	3	12	15	13	18	31

5.How many Intermediate Re-Sales there have been in each of the above Parishes over the last three 12-month periods (i.e., 3 years)?

As North Somerset Council doesn't have its own housing stock this information has been given by each respective Registered Provider individually, please see below.

	<b>20/21</b>	<b>21/22</b>	<b>22/23</b>	<b>23/24</b>
<b>Weston-Super-Mare</b>	9	9	1	2
<b>Yatton</b>	1			1
<b>Langford</b>		1		
<b>Sandford</b>				1
<b>Clevedon</b>	1		1	

6.Are you able to advise on the number of new affordable homes that are included in the 5-year planned housing land supply (by size and tenure if possible) in each of the above Parishes?

I would like to guide your attention towards the ongoing consultation for the Emerging Local Plan. Schedule 1 of this plan outlines sites for the next 15 years, providing details on those that have already obtained planning permission.

[www.n-somerset.gov.uk/localplan2039](http://www.n-somerset.gov.uk/localplan2039).

Please note pipeline programmes provided by Registered Providers are for the current financial year and offer a trajectory for the following financial year forecasts. However, these forecasts can vary subject to slippages, amendments to planning applications, S106 modifications and additional information required for planning conditions.

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