

Affordable Housing Proof of Evidence of Mr James Stacey BA (Hons) Dip TP MRTPI

Land at Farleigh Farm and 54 and 56 Farleigh Road,
Backwell, North Somerset

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Outline planning application for demolition of 54 and 56 Farleigh Road; residential development of up to 125 dwellings (Class C3); strategic landscaping and earthworks, surface water drainage and all other ancillary infrastructure and enabling works with means of site access (excluding internal roads) from the new junction off Farleigh Road for approval; all other matters (internal access, layout, appearance, scale and landscaping) reserved for subsequent approval

Land at Farleigh Farm and 54 and 56 Farleigh Road, Backwell, North Somerset

Persimmon Homes (Severn Valley)

February 2022

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Contents

Section 1	Introduction	1
Section 2	Affordable Housing as an Important Material Consideration	4
Section 3	The National Housing Crisis	6
Section 4	The Extent of the National Shortfall in Housing Delivery	39
Section 5	The Development Plan and Related Policies	52
Section 6	Affordable Housing Needs and Delivery	63
Section 7	Affordability Indicators	77
Section 8	The Consequences of Failing to Deliver Affordable Housing and Weight to be Attributed to the Proposed Affordable Housing Provision	91

Appendices

- Appendix JS1 Freedom of Information Response dated 13 January 2022
- Appendix JS2 Extracts from the Planning Practice Guidance
- Appendix JS3 Hansard Transcript of House of Commons Debate, October 2013
- Appendix JS4 Former Secretary of State Speech on the Housing Market, November 2017
- Appendix JS5 Affordable Housing Forward Supply Review
- Appendix JS6 Right to Buy Consultation Paper 2018 Extract: Use of Receipts for Acquisition
- Appendix JS7 North Somerset HomeChoice Allocations Policy, October 2020
- Appendix JS8 'Applicants barred by local connection rules', Inside Housing', March 2016
- Appendix JS9 Appeal decision extract: Land at Franklands Drive, Addlestone, Surrey (1198326)

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by James Stacey of Tetlow King Planning on behalf of the Appellant, Persimmon Homes (Severn Valley), in respect of the proposed development at Land at Farleigh Farm and 54 and 56 Farleigh Road, Backwell, North Somerset. The site is also known as “Farleigh Fields”. This Proof examines the affordable housing need in the North Somerset Council (“NSC”) authority area and in the Backwell settlement area and considers the weight to be attributed to affordable housing in the overall planning balance.
- 1.2 My Proof deals specifically with affordable housing and the weight to be attributed to it in the planning decision in light of evidence of need in the area. It should be read alongside the evidence of;
- Mr Gary Holliday on landscape matters;
 - Mr Gareth Howell on urban design matters;
 - Mr Andrew Moger, on self- and custom-build housing;
 - Mr Nick Paterson-Neild on the housing land supply; and
 - Mrs Kathryn Ventham on planning matters.
- 1.3 Outline planning permission is sought for the development of up to 125 dwellings; the full description of development is set out below:
- “Outline planning application for demolition of 54 and 56 Farleigh Road; residential development of up to 125 dwellings (Class C3); strategic landscaping and earthworks, surface water drainage and all other ancillary infrastructure and enabling works with means of site access (excluding internal roads) from the new junction off Farleigh Road for approval; all other matters (internal access, layout, appearance, scale and landscaping) reserved for subsequent approval”.*
- 1.4 The proposed development will deliver 30% affordable housing, equivalent to 38 dwellings. This level of provision meets the expectation set out in adopted Core Strategy policy CS16 which sets a benchmark of 30% affordable housing provision.

1.5 I understand the Appellant seeks to limit the number of units to 115 dwellings by way of a proposed condition. Please refer to the Planning Proof of Evidence of Ms Kathryn Ventham. The percentage of affordable housing will remain the same at 30% and the proposed number of affordable houses reduces from 38 to 35 dwellings.

1.6 My credentials as an expert witness are summarised as follows:

- I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England (UWE) (1997). I am a member of the Royal Town Planning Institute.
- I have over 26 years' professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and have been in private practice since 2001. I have been a Director/Senior Director of Tetlow King Planning Ltd for the past 11 years.
- During the course of my career, I have presented evidence at in excess of 90 Section 78 appeal inquiries and hearings, including a number within North Somerset and the South West region. I act for a cross-section of clients and advise upon a diverse range of planning and housing related matters.
- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plans, including Local Development Framework Core Strategies and many specific development plan and supplementary planning documents on affordable housing throughout the UK.

1.7 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

"The evidence which I have prepared and provide for this appeal reference APP/D0121/W/21/3285624 in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions".

1.8 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. This is set out in the most up-to-date

version of the National Planning Policy Framework (“NPPF”), the Planning Practice Guidance (“PPG”), the National Housing Strategy and the Government’s Housing White Paper. Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.9 In researching the information which underpins my evidence, I have placed reliance on a Freedom of Information (“Fol”) request submitted to North Somerset Council on 3 December 2021 seeking a range of information in respect of affordable housing matters. The Council provided a response on 13 January 2022. Copies of all correspondence relating to the FOI request can be found at **Appendix JS1**.

1.10 This Proof of Evidence comprises the following seven sections:

- Section 2 of the report establishes the importance of affordable housing as an important material planning consideration;
- Section 3 considers the national housing crisis;
- Section 4 discusses the extent of the national shortfall in housing delivery;
- Section 5 analyses the Development Plan and related policy framework including North Somerset corporate documents;
- Section 6 considers the need for affordable housing in North Somerset and in Backwell, and the extent to which new affordable homes are being delivered towards meeting this;
- Section 7 considers a range of affordability indicators; and
- Section 8 considers consequences of failing to deliver affordable housing and the weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent national planning policy, including the NPPF.
- 2.2 It has been reflected in a number of court cases including *Mitchell v Secretary of State for the Environment and Another*, Court of Appeal (1994); *ECC Construction Limited v Secretary for the Environment and Carrick District Council*, Queens Bench Division (1994); *R v Tower of Hamlets London District Council, ex parte Barratt Homes Ltd*, Queens Bench Division (2000).

National Planning Policy Framework (July 2021) (CD-F1)

- 2.3 The revised NPPF was last updated on 20 July 2021 and is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 2.4 It sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective is to “*support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations*” (paragraph 8).
- 2.5 Chapter 5 NPPF (2021) focuses on delivering a sufficient supply of homes, in which paragraph 60 confirms the Government's objective of “*significantly boosting the supply of homes*”.
- 2.6 The NPPF (2021) is clear that local authorities should deliver a mix of housing sizes, types and tenures for different groups, which include “*those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*” (paragraph 63).

- 2.7 It places a great responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. Paragraph 65 establishes that *“at least 10% of new homes on major residential developments be available for affordable home ownership”*.
- 2.8 Affordable housing is defined within the NPPF (2021) glossary as affordable housing for rent (in accordance with the Government’s rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents), Starter Homes, discounted market sales housing (at least 20% below local market value) and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Planning Practice Guidance (March 2014, Ongoing Updates) (CD-F2)

- 2.9 The PPG was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application.
- 2.10 **Appendix JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Conclusions on Affordable Housing as an Important Material Consideration

- 2.11 Within national policy, providing affordable housing has long been established as, and remains, a key national priority as part of the drive to address the national housing crisis.

The National Housing Crisis

Section 3

- 3.1 There is incontrovertible evidence that there is a national housing crisis in the UK affecting many millions of people, who are unable to access suitable accommodation to meet their housing needs. This section highlights some of this evidence and the Government's response to grappling with this issue.

Laying the Foundations – A Housing Strategy for England (November 2011)

- 3.2 Laying the Foundations: A Housing Strategy for England was published on 21 November 2011. The foreword by the former Prime Minister and former Deputy Prime Minister set out the former Coalition Government's intention to unblock the housing market and tackle the social and economic consequences of the failure to develop sufficient high-quality homes over recent decades.
- 3.3 The Executive Summary signed off by both the then Secretary of State for Communities and Local Government and the then Minister for Housing and Local Government included the following:
- A thriving active but stable housing market that offers choice, flexibility and affordable housing is stated as being critical to our economic and social wellbeing;
 - *'The problems we face are stark'* and have been compounded by the impact of the credit crunch;
 - *'Urgent action to build new homes'* is necessary as children will grow up without the opportunities to live near their family and older people will not have the choice and support, they need;
 - *'Housing is crucial for our social mobility, health and wellbeing'*;
 - *'Housing is inextricably linked to the wider health of the economy'*; and
 - Fundamental to the whole approach of the strategy is communities (including prospective owners and tenants), landlords and developers working together.

House of Commons Debate (October 2013)

3.4 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply; despite the debate taking place over eight years ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in North Somerset. A copy of the debate can be found at **Appendix JS3**. The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:

“I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”

3.5 When asked to clarify the word “*crisis*” by the Member for Tewkesbury, Nick Boles commented that in the past year the percentage of first time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.

3.6 In response to questions, Nick Boles reaffirmed that:

“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.

3.7 He went on to say: “*It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”*”

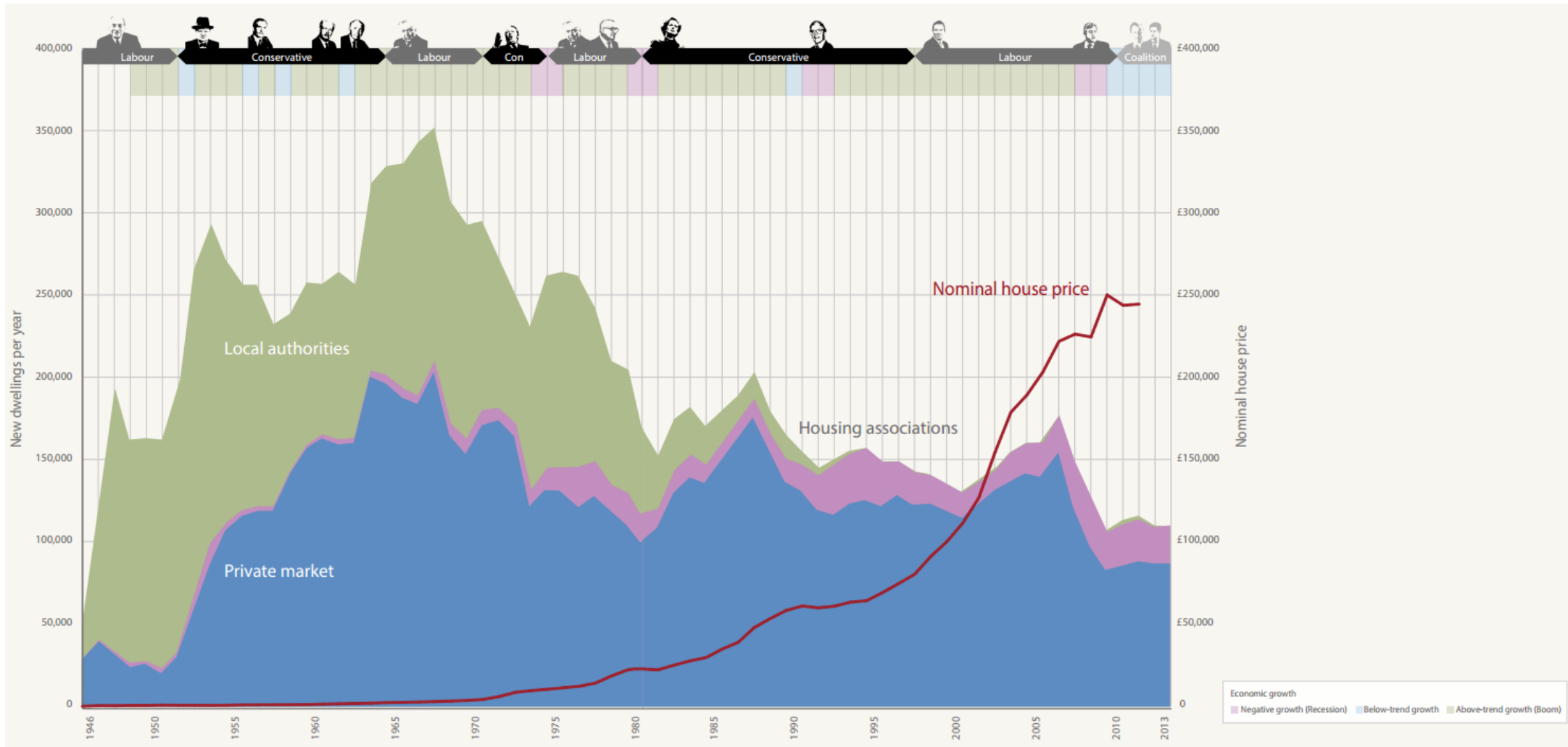
3.8 Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable,

housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

Building the Homes We Need (April 2014)

- 3.9 This report was the result of a year-long project by KPMG and Shelter to understand the housing shortage and was intended to provide advice to the incoming 2015 Government.
- 3.10 The report started by setting out that *“everyone now accepts that we have a desperate housing shortage in England.”* It further explained that *“each year we build 100,000 fewer homes than we need, adding to a shortage that has been growing for decades. What’s more, our current house building system seems incapable of delivering growth on the scale required. Growing demand means that without a step change in supply we will be locked into a spiral of increasing house prices and rents – making the current housing crisis worse”.*
- 3.11 The report highlighted that if we do not take firm action to build more homes there will be very worrying consequences for our economy and society; including rising homelessness, stalled social mobility, declining pension saving and an ever-rising benefit bill.
- 3.12 The report set out the graph illustrated in figure 3.1 showing the levels of house building in England since 1946.

Figure 3.1: House building since 1946



Source: *Building the Homes We Need, Shelter and KPMG (2014)*

3.13 The figure 3.1 graph shows four interrelated trends:

- An overall decline in house building since 1946, including a steep decline from 1980 and a marked further decline since 2007;
- Relatively high levels of social housing provision by local authorities up until the mid-1970s;
- The growing relative contribution to affordable housing provision by housing associations since the late 1980s; they are providing most of the new affordable housing stock but not matching anything like the previous local authority contribution; and
- The gradual increase in the nominal house price through until about 1985 then grows exponential over the subsequent 30 years. There appears to be a correlation with the decline in new housing provision, although there are clearly other interrelated factors.

Fixing our Broken Housing Market (February 2017) (CD I20)

3.14 The Housing White Paper: Fixing our Broken Housing Market, was published in February 2017. The foreword by the then Prime Minister, Theresa May, was very clear that the housing crisis is one of the biggest barriers to progress facing the country.

3.15 The then Prime Minister's foreword stated that:

“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working-class people who are struggling to get by.

Today the average house costs almost eight times average earnings – an all-time record. As a result, it is difficult to get on to the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000.

These high housing costs hurt ordinary working people the most. In total more than 2.2 million working households with below-average incomes spend a third or more of their disposable income on housing.

This means they have less money to spend on other things every month, and are unable to put anything aside to get together the sums needed for a deposit...

...I want to fix this broken market so that housing is more affordable, and people have the security they need to plan for the future.

The starting point is to build more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the costs of renting down...

...By building the homes Britain needs and giving those renting a fairer deal, we will give those growing up in society today more chance of enjoying the same opportunities as their parents and grandparents. It will ensure that the housing market is as fair for those who don't own their own homes as it is for those that do. This is a vital part of our Plan for Britain and a critical step along the way towards fulfilling the mission I have set out to make Britain a country that works for everyone."

- 3.16 The former Secretary of State for Communities and Local Government, Sajid Javid, also provided commentary on the housing crisis in his foreword to the White Paper where he stated that:

"This country doesn't have enough homes. That's not a personal opinion or a political calculation. It's a simple statement of fact.

For decades, the pace of house building has been sluggish at best. As a result, the number of new homes has not kept pace with our growing population. And that, in turn, has created a market that fails to work for far too many people.

Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation...

...The housing market has taken decades to reach the state it's now in. Turning it around won't be quick or easy. But it can be done. It must be done".

- 3.17 The introduction to the White Paper was clear:

"The housing market in this country is broken, and the cause is very simple: for too long, we haven't built enough homes".

- 3.18 It goes onto explain that since the 1970s, there have been on average, 160,000 new homes each year in England and that the consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under-supply. The laws of supply and demand mean the result is simple. Since 1998, the ratio of average house prices to average earnings has more than doubled. That means the most basic of human needs – a safe, secure home to call your own – isn't just a distant dream for millions of people. It's a dream that's moving further and further away.
- 3.19 Furthermore, as recently as the 1990s, a first-time buyer couple on a low-to-middle income saving 5% of their wages each month would have enough for an average sized deposit after just three years. Today it would take them 24 years. It's no surprise that home ownership among 25 to 34-year olds has fallen from 59% just over a decade ago to just 37% today.
- 3.20 The White Paper also reported that Britain's broken housing market hurts all of us. Sky high property prices stop people moving to where the jobs are. That's bad news for people who can't find work, and bad news for successful companies that can't attract the skilled workforce they need to grow which is bad news for the whole economy.
- 3.21 Section four of the White Paper identified at paragraph 4.1 that England has some of the highest house price inflation and worst affordability in the OECD. An average home now costs almost eight times average earnings, and nearly 30% of local authorities have house prices over 10 times average earnings.
- 3.22 Paragraph 4.3 revealed that rising prices are particularly tough on younger people trying to get onto the housing ladder or wanting to move into their first family home. Some young people have no choice but to continue to live with their parents, friends or strangers to make ends meet. Renters are seeing their rents rise; some are only just managing to cover their costs. For the average couple in the private rented sector, rent now takes up roughly half of their gross income.
- 3.23 At paragraph 4.4 the White Paper reported that in areas where the housing shortage is most acute, high demand and low supply is creating opportunities for exploitation and abuse: unreasonable letting agent's fees, unfair terms in leases, landlords letting out dangerous, overcrowded properties. In short, it's becoming harder to rent a safe, secure property. And more and more people can't find a place to rent at all, added to which the loss of a private rented sector tenancy is now the most common cause of homelessness.

Priced Out: Affordable Housing in England (November 2017)

- 3.24 The Institute for Public Policy Research (IPPR) identified that affordable housing delivery continued to fall well behind the required level of need. In this study, the IPPR provided an overview of current affordability challenges across England, alongside a set of recommendations to increase affordable housing delivery.
- 3.25 The report found that in 67% of local authorities across England, insufficient homes were built to meet demand in 2015/16. In addition, house prices have risen by 76% since 1995, far outstripping inflation and as a result are out of reach to many on average incomes.
- 3.26 It also highlighted that the nature of affordable housing has changed in recent years. The range of available products has increased with these products becoming increasingly divorced from earnings and linked to market prices or rents.
- 3.27 Many affordable housing models are out of the reach of single people. Whilst dual earning couples, even those with lower quartile earnings, can afford most models in most areas, when income is diminished by the removal of a full-time earner as in the case of couples with a child, a much larger range of models become out of reach, particularly for those on lower incomes.

Government Post-EU Referendum

- 3.28 The government which formed after the Brexit vote continued to pursue the issue of increased housebuilding. In commenting upon the increase on the number of new homes built and started in June 2016 the-then Communities Secretary Sajid Javid said:

“We’ve got the country building again with more new homes started and built than this time last year...”

...This is real progress but there is much more to do. That’s why we are going further and increasing our investment in house building to ensure many more people can benefit.”

- 3.29 In terms of continued support for home ownership the then Housing and Planning Minister Gavin Barwell said in response to the English Housing Survey (released 21 July 2016):

“We are determined to ensure that anyone who works hard and aspires to own their own home has the opportunity to do so...”

Since 2010 over 300,000 households have been helped into home ownership through government-backed schemes...

The ground-breaking Housing and Planning Act will allow us to go even further delivering our ambition to build an additional one million homes."

- 3.30 This suggests that successive governments are continuing with their earlier aspirations and policies regarding housebuilding and homeownership.

**Former Secretary of State for Housing, Communities and Local Government
Speech to Local Government Association Conference (July 2017)**

- 3.31 At the beginning of July 2017 the then Secretary of State for Housing, Communities and Local Government, Sajid Javid, addressed the conference reflecting on *"what has gone wrong in local government"* and outlining what the national and local governments need to do to address the nationwide housing crisis.

- 3.32 On housing, Mr Javid stated that *"there's a serious shortage of decent, affordable housing in this country"*. He added *"since the 1970s – under Wilson, Callaghan, Thatcher, Major, Blair, Brown, Cameron and now May – we've supplied an average of 160,000 new homes each year. That's far below what's needed, and that failure of supply to keep up with demand has led to predictable results"*.

- 3.33 Mr Javid summarised the issue, by outlining that *"the simple fact is that to put this right we need to build more homes that people want to live in, in places people want to live"*.

Former Prime Minister's Speech (15 November 2017)

- 3.34 In November 2017, former Prime Minister Theresa May delivered a speech in which she made it her 'mission' to speed up the delivery of more homes.

- 3.35 Mrs May announced that *"for decades we simply have not been building enough homes, nor have we been building them quickly enough, and we have seen prices rise"*. Whilst *"the number of new homes being delivered each year has been increasing since 2010"* and acknowledged that *"there is more we can do"*.

- 3.36 She stated that *"we must get back into the business of building the good quality new homes for people who need them most"* and *"that is why I have made it my mission to build the homes the country needs and take personal charge of the Government's response"*.

- 3.37 The former Prime Minister added that *“today I am seeing the work now underway to put this right and, in coming weeks and months, my Government will be going further to ensure that we build more homes, more quickly”*.
- 3.38 In concluding, Theresa May stated that *“this will be a long journey and it will take time for us to fix the broken housing market - but I am determined to build a Britain fit for the future”*.

**Former Secretary of State for Housing, Communities and Local Government
Speech on the Housing Market (16 November 2017)**

- 3.39 The day after the former Prime Minister pledged her commitment to providing more homes, former Communities Secretary Sajid Javid delivered a speech setting out his blueprint for boosting housing provision. A copy of this speech is attached as **Appendix JS4**.
- 3.40 Mr Javid announced that following the publication of official figures, there was an additional 217,000 new homes (net) which were delivered during the 2016/17 financial year. He added that this was the *“first time in almost a decade that the 200,000 milestone had been reached”*.
- 3.41 However, Mr Javid acknowledged that *“it is painfully obvious that there remains much, much more to be done”*, and that *“fixing the broken housing market will require a much larger effort”*.
- 3.42 He set out that *“even today, I still hear from those who say that there isn’t a problem with housing in this country. That we don’t need to build more. That affordability is only a problem for Millennials that spend too much on nights out and smashed avocados. It’s nonsense...where once it would have taken an average couple 3 years to save for a deposit – it will now take a quarter of a century. Assuming of course they could save at all”*.
- 3.43 Mr Javid compared the position of a first-time buyer in London saying a deposit of more than £90,000 was needed and lamented *“that’s a lot of avocados.”*
- 3.44 The former Communities Secretary stated that *“without affordable, secure, safe housing we risk creating a rootless generation, drifting from one short-term tenancy to the next, never staying long enough to play a real role in their community”*.

Former Prime Minister’s Speech to the National Housing Federation Summit (September 2018)

3.45 There is continued acknowledgment from the-then Prime Minister that the housing market is broken with the importance of more indistinguishable, high quality affordable homes being a crucial to resolving the housing crisis, with housing associations being at the forefront of increased affordable housing delivery.

3.46 In her speech to the National Housing Federation, Theresa May spoke to housing leaders about tackling “*what remains one of the greatest challenges of our time*” and *how she has made it her “personal mission to fix our broken housing system”*.

3.47 The former Prime Minister set out that one of the Government’s priorities is:

“doing all we can to get more of the right homes built in the right places, so we can help more people onto the housing ladder – and ensure that those who cannot afford to own their own home also have a decent place to live”.

3.48 She went on to make clear that:

“the housing crisis we face today did not come about overnight. It is the result of decades of neglect. Year after year in which housebuilding of all kinds fell even as demand rose. So, while the steps we are taking are already making a real and lasting difference to millions of lives, we should not pretend that our broken housing system can be fixed at the flick of a switch.”

House of Commons Briefing Paper: Tackling the under-supply of Housing (12 December 2018)

3.49 The Paper provided an analysis of evidence in relation to how much housing the UK needs, trends in UK housing supply, barriers and solutions to supply in England and additional responses to the Housing White Paper.

3.50 The Briefing Paper set out that “*according to DCLG’s projections, the number of households in England is expected to grow from 22.7 million in 2014 to 28.0 million in 2039. This is an average increase of around 210,000 households per year.*”

3.51 It stated that “*in 2015/16, the total housing stock in England increased by around 190,000 residential dwellings: 12% higher than the previous year’s increase but a long way short of the estimated 240-250,000 new homes needed to keep pace with household formation*” (my emphasis).

- 3.52 The Paper went on to identify that “*the new supply of social housing has not kept pace with growth in other sectors; in the long term, it has generally been lower than the amount lost through sales and demolitions*” (my emphasis).

Centre for Policy Studies Press Release (January 2019)

- 3.53 The press release outlines new analysis indicating that the 2010s will see housebuilding figures in England come in below any decade since the Second World War which is part of a 50-year pattern in which each decade has seen fewer new homes built than the last.
- 3.54 It stated that despite the Government’s recent efforts to boost construction, new-build housing completions in England between 2010 and 2019 are set to be approximately 130,000 per year - well below the 147,000 of the 2000s or 150,000 of the 1990s, and half of the level in the 1960s and 1970.
- 3.55 It goes on to say the picture becomes even worse when you factor in population size. In the 1960s, the new-build construction rate in England was roughly the equivalent of one home for every 14 people over the decade. In the 2010s, that ratio was one to 43, more than three times higher.

Building for Our Future: A Vision for Social Housing (January 2019)

- 3.56 The report produced by Shelter states three million homes must be built in England over 20 years to solve the housing crisis. It advises 1.2 million homes are needed for younger families who cannot afford to buy and face a lifetime in expensive and insecure private renting.
- 3.57 The research estimates 277,000 people are homeless in England, most commonly because they have lost their privately rented homes. The report indicates that upfront costs of £11bn a year could come from housing benefit savings by moving tenants from privately rented homes to social housing.
- 3.58 It also claims that schemes such as Help-to-Buy are a less effective use of taxpayers’ money. It reports that 59% of people who used Help to Buy said they could have afforded the same or a similar property without using the scheme, meaning that only 24,000 households have been able to get into home ownership because of Help to Buy.

Bleak Houses: Tackling the Crisis of Family Homelessness in England (August 2019)

- 3.59 The report was produced by the Children’s Commissioner to investigate the impact of homelessness and in particular the effect of this upon children.
- 3.60 It identifies that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms. It states that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, as a result of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
- 3.61 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It states that *“Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work”*.
- 3.62 The report particularly focused on the effect on children. In particular the report reveals that many families face the problem of poor temporary accommodation and no choice but to move out of their local area, which can have a *“deeply disruptive impact on family life”*. This can include lack of support (from grandparents for example) and travel costs.
- 3.63 It finds that a child’s education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children’s educational development can also be delayed.
- 3.64 Temporary accommodation also prevents serious risks to children’s health, wellbeing and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour or those with substance abuse issues.
- 3.65 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a *“significant impact on many aspects of their lives”*.

House of Commons Debate on a Motion on the British Housebuilding Industry (August 2019)

- 3.66 The debate pack was produced by the House of Commons Library in August 2019 in advance of a debate on the British housebuilding industry in September 2019.
- 3.67 The report noted at paragraph 1.2 that there were 83,700 homeless households living in temporary accommodation in England at the end of December 2018, a 74% increase compared with December 2010.
- 3.68 Furthermore, the number of people sleeping rough in England on any given night in Autumn 2018 was 4,677 people, 165% higher than in 2010.
- 3.69 In the debate itself, it resolved at Column 465, 4.59pm, that:

“This House notes with concern the ongoing shortage of housing and the housing crisis across England; further notes with concern the number of families in temporary accommodation and the number of people rough sleeping; [and] acknowledges that there are over one million households on housing waiting lists...”

- 3.70 It concluded that it *“calls on the Government to tackle the housing crisis as an urgent priority”* (my emphasis).

Housing Minister’s speech to the RESI Convention 2019 (September 2019)

- 3.71 Following her appointment as the then Housing Minister on 24 July 2019, Esther McVey spoke at the RESI Convention claiming that the shortage of housing in the UK is possibly the largest scandal to hit the country in the past 30 years.
- 3.72 Ms McVey acknowledged that the housing crisis has led *“to a rise in renting and costs, and to a fall in home ownership which has destroyed the aspiration of a generation of working people.”*
- 3.73 Continuing to talk on the subject of affordability, the Housing Minister stated that:
- “Since the mid-1990s, house prices have risen to 8 times, 10 times, 12 times, in some of the most expensive parts of this country 44 times the actual income of someone, that cannot be right.”*
- 3.74 Ms McVey detailed that *“too many people feel that vital link between hard-work and owning their own home is broken. And when that link is severed, social mobility and opportunity falls away.”*

National Housing Federation Research (September 2019)

- 3.75 The National Housing Federation (“NHF”) published new research on the state of the housing crisis which found that 8.4 million people across England are directly affected by the housing crisis, which amounts to one in seven people.
- 3.76 The NHF report that people are affected in a variety of ways, including:
- Living in overcrowded homes;
 - Living with ex-partners or parents;
 - Living in unsuitable homes, such as homes that are not suitable for people with mobility issues; and
 - People who are homeless or at risk of homelessness.
- 3.77 Of these 8.4 million, around half, some 43% or 3.6 million, would need a social rented home to meet their needs.
- 3.78 Commenting on the NHF’s report the Local Government Association said that the Government “*should now go further and devolve Right to Buy so that councils retain 100 per cent of their receipts to reinvest*”.

Conservative Party Manifesto (December 2019)

- 3.79 The Conservative Party Manifesto for the December 2019 election reports at page 29 that “*the biggest problem that young people face in getting on the housing ladder is the deposit.*” It commits to ensure that the Government will “*offer more homes to local families*”
- 3.80 At page 30 of the Manifesto it states that “*home ownership is one of the most fundamental Conservative values. People are happier, more secure and more rooted in their communities when they own their own home – and know that they can pass it on to future generations*”. It goes on to set out that “*young people need the security of knowing that home ownership is within their reach – that they too can have a tangible stake in society, can be rooted in their communities and have a place to raise a family*”.
- 3.81 The Manifesto (page 30) details that “*while we want to encourage as many people as possible into home ownership, we recognise that not everyone can afford their own home – and that those in social housing deserve the same dignity, respect and fair treatment as private renters*”. It commits to bring forward a Social Housing White

Paper to “*support the continued supply of social housing*” and commits to “*end the blight of rough sleeping by the end of the next parliament*”.

- 3.82 Under the heading of ‘places we want to live in’ at page 31, the Manifesto explains that despite increased housebuilding since 2010 “*it still isn’t enough. That is why we will continue our progress towards our target of 300,000 homes a year by the mid-2020s. This will see us build at least a million more homes, of all tenures over the next Parliament*”.

BBC Housing Briefing (February 2020)

- 3.83 The BBC Housing Briefing summarises a range of secondary data and case studies relating to the scale of housing need, quality, availability, and tenure. Sections 1 to 4 cover the broad context and issues; sections 5 to 7 consider the role of the public and private sectors in housing provision; and sections 8 to 10 cover policy mechanisms to address housing issues. The Briefing is prepared at the national level and sets out the overall ‘picture’ in respect of housing matters.
- 3.84 The Briefing was the topic of several news stories on the BBC Website and was widely promoted on the day of its publication, including through radio phone-ins, television news items, and the Bitesize revision service for teenagers.
- 3.85 The BBC states that the Housing Briefing was prepared in order to address public demand for “*more transparency and better explanation of the facts behind the headlines*”. The acknowledgements include Dame Kate Barker who undertook a review of the housing market in 2004, and Toby Lloyd, the former policy director of Shelter.
- 3.86 Section 8 of the Briefing refers to the scale of the housing shortfall that has amassed in recent years. It highlights at page 134 the work undertaken by Dame Kate Barker in 2004, the KPMG/Shelter study of 2014; the joint study between Heriott Watt University, Crisis and the National Housing Federation in 2018/9; all of which are referenced at Section 4 of this Proof of Evidence.
- 3.87 The Briefing contains case studies throughout which highlight the impact of the housing crisis on real people and households. These include the numerous case studies at pages 33, 40, 66, 69, 84, and 125 which include those in desperate need, facing homelessness or temporary accommodation, and those trapped in rented housing unable to afford to purchase.

- 3.88 The Briefing also refers to the serious impact of family homelessness upon children at page 34 and the work undertaken by the Children’s Commissioner, which I have reviewed at paragraphs 3.49 to 3.55 of this section.

Spring Budget 2020 (March 2020)

- 3.89 The Spring Budget 2020 was presented by the Chancellor of the Exchequer, Rishi Sunak, to Parliament on 11 March, setting out an ambitious package of investment plans in the first Budget since the UK’s departure from the European Union (EU).

- 3.90 Speaking on housing, the Chancellor stated the following:

“Everyone should be able to access a safe and affordable home. Increasing housing supply is essential to creating a fairer, more affordable housing market and boosting productivity across the country”.

- 3.91 The Chancellor continued to explain in further detail the demand for more housing in the UK, concluding his points by confirming that *“the government has committed to creating at least 1 million new homes in England by the end of this Parliament and an average of 300,000 homes a year by the mid-2020s.”*

- 3.92 The Chancellor also confirmed that the Government will be investing a further £9.5 billion into the Affordable Homes Programme, raising the level of investment to £12.2 billion of grant funding from 2021-22 to support the creation of affordable homes across England.

‘Planning for the Future’ Policy Paper (March 2020)

- 3.93 On 12 March 2020, and as trailed in the Budget the previous day, the Government published a policy paper titled ‘Planning for the Future’. It provides a summary of the reforms the Government expects to explore in more detail in the forthcoming Planning White Paper.

- 3.94 The introductory paragraphs emphasise the Government’s intention to boost homeownership, noting at paragraph 2 *that “for many who are still trapped paying high rents and struggling to save for a deposit, home ownership seems like a dream which is increasingly out of reach”.* The paper also clearly recognises the importance of providing for those who are not homeowners. Paragraph 4 states *that “We must ensure security for those who do not own their homes”* and that *“We also need to prevent people from falling into homelessness by building more affordable homes and ensure that those living in social housing are treated with the dignity and respect they deserve”.*

3.95 Relevant measures proposed in the policy paper include those to help first time buyers onto the property ladder (paragraph 14), through the proposed First Homes scheme, work to deliver long-term fixed rate mortgages, and a new Shared Ownership model. Paragraph 17 goes further in respect of affordable housing, noting that *“We [the Government] are committed to improving access to safe and high-quality housing, improving affordability...”* and proposed measures include a renewed financial commitment to affordable housing and a package of measures to protect social and private sector renters. Paragraphs 18 to 20 explain that, in order to inform the Planning White Paper the Government will review the housing market and planning system and will consider, amongst other related matters, *“how to ensure affordable, quality, safe housing”*.

Affordable Housing Commission Report (March 2020)

3.96 The Affordable Housing Commission (“AHC”) is an independent, non-partisan group comprising fifteen experts drawn from the public, private and voluntary sectors. Its extensive full report was released in late March 2020 and examines a wide range of issues relating to the housing affordability crisis, with data from a wide range of sources. The AHC report examines the approach taken to affordable housing through the planning system; the definition of an ‘affordable’ rent; the challenges facing households in housing stress; and other measures including the approach taken to public investment and taxation.

3.97 The AHC report paints a bleak picture of housing affordability at present. It makes the simple proposition that *“Something has gone fundamentally wrong with the housing system and what it offers local people”*. The effects of this are serious and wide-ranging. The AHC notes that:

“Housing stress is impoverishing families and young and old struggling renters, creating debts and arrears, harming health and well-being, and limiting life chances and aspiration. There are wider negative effects too – on the economy and productivity, on wealth inequality and poverty – resulting in more public expenditure subsidising rents and healthcare and tackling homelessness”.

3.98 The AHC concludes that the root cause of the current affordability crisis is a clear shift in the structure of the housing market over the last 20 years. The AHC note that social rented sector has contracted, with low rates of new supply and extensive losses through the Right to Buy. By contrast, the AHC notes that the private rented

sector has expanded significantly, even though it is ill-equipped to provide for those groups in greatest housing need.

- 3.99 The AHC is clear that the housing crisis is of such a scale that it will take many years to resolve. Its first recommendation is that the Government commits to ensure all households have access to affordable housing by 2045 so that the next generation does not face the same kind of hardships as the current.
- 3.100 Its package of 53 recommendations seek to substantially boost the role of the social rented sector, whilst also helping a sizeable cohort of households termed ‘frustrated first time buyers’ into homeownership. Key recommendations for planning include recommendation 5 to address the supply of affordable housing, namely that *“the government seeks a step change in affordable housing supply in line with the latest assessments of housing need. On current best evidence, this would equate to an increase to about 90,000 social rented homes a year (forming part of the government’s overall housing target of 300,000 homes a year)”*. Recommendation 43 notes the important role that Local Planning Authorities must play in this, and states that:

“The Commission recommends that the preparation of local plans be made an enforceable statutory duty to ensure that all councils are delivering on their housing plans and targets. Local and city-region plans must be based on accurate housing needs assessment – including numbers of concealed households – which should be updated regularly”.

- 3.101 Recommendation 16 addresses the impact of Right to Buy and proposes reforms to the system. It states that:

“The Commission recognises that the Right to Buy remains a popular scheme. However, it is undermining efforts to address affordability, reducing numbers of relets at lower rents and moving properties from social renting to the PRS. Accordingly, the Commission recommends that the RTB is radically overhauled, including giving councils and housing associations discretion over the level of discount they offer, complete control over receipts and the opportunity to restrict any letting by a purchaser (e.g. requiring consent for letting the property)”.

Speech by the Housing Minister Christopher Pincher at the Planning Inspectorate Annual Training Event (March 2020)

3.102 In a speech on 9 March 2020 to the Planning Inspectorate, the then- Housing Minister, Christopher Pincher stated that:

“I know a lot about the need for new and better homes. Because in my part of the world, houses for purchase and rent are appreciatively more expensive than in other parts of the West Midlands as we simply do not have enough homes.

There isn’t a week that goes by without my constituents contacting me saying, “Chris, we just aren’t able to buy or to rent the homes that we want to live in in this beautiful part of the world.” (my emphasis)

Shelter/Savills - Social Housing & Britain’s Housebuilding Recovery (June 2020)

3.103 Analysis undertaken by Shelter and Savills in June 2020 identifies a range of scenarios for housebuilding recovery following the significant impact Covid-19 has had for the housebuilding industry and the wider economy in 2020.

3.104 The scenarios anticipate that between 125,000 and 318,000 fewer new dwellings will be delivered in the five years 2020-2025 as a result of Covid-19, equating to a 9-23% drop in delivery.

3.105 Of these, between 25,000 and 66,000 fewer affordable homes will be delivered (an 8-21% drop in delivery). Of these scenarios, the ‘best case’ assumes a rapid economic recovery (e.g. in light of medical advances) and the worst case assumes deeper and longer economic difficulties.

3.106 Shelter recommends boosting social housing provision in order to support overall housing output, with social housing demand being counter-cyclical to the prevailing wider economy.

Housing, Communities and Local Government Committee: Building more social Housing, Third Report of Session 2019–21

3.107 The Housing, Communities and Local Government Committee held an inquiry in 2020 into the delivery of social housing, building upon work undertaken in 2018 by its predecessor committee. The inquiry sought to investigate matters relating to the long-term delivery of social and affordable rented homes in England.

- 3.108 The Committee identified several matters of concern relating to the state of the housing market and the availability of affordable housing. Drawing in evidence from housing associations, charitable bodies and local authorities, the Committee noted the research by Shelter that some 500,000 households are homeless or not living in satisfactory housing; some 1 in 9 children live in overcrowded homes, and that use of Temporary Accommodation has risen by 82% since 2010. It also noted the increasing rates of poverty observed in the private rented sector, and the Committee supported the Affordable Housing Commission's finding that where housing costs more than one third of household incomes then serious issues such as arrears and debts become prevalent.
- 3.109 In terms of the annual need for affordable homes, the Committee considered evidence from a number of sources and was supportive of the work by the National Housing Federation in 2018 which identifies an annually-arising need for around 90,000 social rented homes, 30,000 affordable rented homes, and 25,000 shared ownership homes. The Committee noted that although local authority housing registers had declined this was largely attributable to the provisions of the Localism Act 2011 which allowed councils to apply additional eligibility criteria.
- 3.110 The Committee was critical of the impact of Right to Buy losses upon the overall affordable housing stock which resulted in a significant depletion of the affordable housing stock – falling from 5.49 million dwellings in 1981 to 4.13 million dwellings in 2019. The Committee noted that the Government's aim of a one-for-one replacement was not being achieved and that restrictions on the spending of receipts limited the ability of councils to replace lost stock.
- 3.111 The Committee has set out a package of recommendations which include improvements to the way housing statistics are collated and published, prioritising a social housebuilding programme, reforms to compulsory purchase rules, and reforms to the Right to Buy.

White Paper: Planning for the Future (August 2020)

- 3.112 On 6 August 2020, the Ministry of Housing, Communities and Government opened a 12-week public consultation on the long anticipated Planning for the Future White Paper. The Planning for the future consultation proposes reforms of the English planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed.

- 3.113 In his foreword on page seven of the White Paper, the Prime Minister, Boris Johnson, highlights the importance of housing delivery, stating the following:

‘And, above all, that gives the people of this country the homes we need in the places we want to live at prices we can afford, so that all of us are free to live where we can connect our talents with opportunity.

Getting homes built is always a controversial business. Any planning application, however modest, almost inevitably attracts objections and I am sure there will be those who say this paper represents too much change too fast, too much of a break from what has gone before.

But what we have now simply does not work.

So let’s do better. Let’s make the system work for all of us. Any let’s take big, bold steps so that we in this country can finally build homes we all need and the future we all want to see.’

- 3.114 On page eight, in his foreword, the former Secretary of State for Housing, Communities and Local Government, Robert Jenrick, declares:

“These proposals will help us to build the homes our country needs, bridge the present generational divide and recreate an ownership society in which more people have the security and dignity of a home of their own.”

Speech by former Secretary of State for Housing, Communities and Local Government to the Chartered Institute for Housing (September 2020)

- 3.115 The former Secretary of State, Robert Jenrick, gave a speech to the Chartered Institute of Housing (“CIH”) in September 2020 covering a range of issues including affordable housing.
- 3.116 The Secretary of State made clear the problems that the Covid-19 pandemic has caused for those less fortunate than most – those stuck in poor, cramped accommodation, struggling to pay the rent, or those – worst of all – who have no home of their own at all. For these people, Jenrick stated that the pandemic *“has unquestionably been one of the darkest periods”*.
- 3.117 Jenrick stated that ‘they deserve better’ and that, as we recover from the pandemic, the Government is absolutely determined to deliver the homes needed.
- 3.118 The Secretary of State recognised that there is ‘still a great deal more to do’ to help those trapped paying high rents who are ‘struggling to save for a deposit to enjoy

homeownership or even to enjoy the security and the dignity that comes with a secure home of their own, whether that be owned or rented’.

3.119 Jenrick stated specifically that ‘*Affordability remains a very big issue across the board*’ and that ‘*issues around affordability are higher than ever on our agenda*’.

3.120 The speech talked about the Government’s Affordable Homes Programme announcement, which aims to deliver up to 180,000 affordable homes over five years from 2021 to 2026, right across the country. This is part of the Government’s commitment to ‘levelling up’ and ensuring that opportunities are available to people across the country.

3.121 Jenrick went on to say that “*whether we’re aiming to help more people onto the housing ladder, people who are renting or, crucially, who are homeless or sleeping rough, we will only succeed if we build more homes*” (my emphasis)

3.122 The Secretary of State also highlighted the planning reforms that were set out at the beginning of the summer, which he stated will help to deliver even more affordable homes.

3.123 The Secretary of State for Housing, Communities and Local Government concluded that, to be on track to realise individual hopes and dreams, and to power the economy and social revival, requires ‘building more homes – affordable homes’, getting more people onto the housing ladder and ‘building where affordability is most challenging’.

NHF – People in Housing Need (September 2020)

3.124 In September 2020, the National Housing Federation (“NHF”) published an analysis of the scale and shape of housing need in England today.

3.125 On page 4, the report shows that ‘*nearly 8 million people in England have some form of housing need*’. Nearly 1.9 million households are hosting a ‘concealed’ household while 3.4 million people found to be living in overcrowded accommodation.

3.126 The report expresses concern that the number of people in need of social housing could rise rapidly as a result of the coronavirus crisis – with low-income earners roughly twice as likely to lose their jobs.

3.127 It finds (page 2) that ‘*Long-term investment in social housing is needed to tackle this problem and provide people with suitable homes they can afford*’.

- 3.128 The report describes how the number of people in need of social housing in England has now hit 3.8 million people. This equates to 1.6 million households – 500,000 more than the 1.16 million households recorded on official waiting lists.
- 3.129 The report provides a clear measurement of housing need, necessary because local housing registers (or waiting lists) have become inadequate following the introduction of the Localism Act in 2011.
- 3.130 It states (page 3) that *‘There is now no consistent set of criteria for allowing households to join a register’* and the data on these registers is not necessarily reviewed for accuracy on a regular basis. While local registers serve an important function, *‘they do not give the full picture of how many people are in need of a home’*, hence the reason for the NHF analysis.
- 3.131 The report identifies how *‘the housing crisis is not one crisis, but a series of interrelated and overlapping crises’* (page 3). These include affordability, the suitability, size and condition of homes, and the ability of people to find accommodation in the first place. Some people will experience one of these problems – others will experience many at once. The complicated picture of interrelated housing crises means there is a need for new, accurate and comprehensive research on housing need, the report finds.
- 3.132 It reveals that the number of people for whom social rent is the most appropriate tenure has increased since the previous iteration of the analysis. It states that *‘This suggests an intensifying of need at the ‘sharp end’ – things are getting worse for the worst off’* (page 5). This is reflected both in the growth in the numbers of people affected by affordability issues and in the growth in overcrowding.
- 3.133 The report continues that more than 3.4 million people were found to be living in overcrowded households, a 5% increase on the previous figures, and 2.7 million were found to have an affordability issue – up nearly 10%.
- 3.134 As might be expected, a significant proportion of these people are to be found within the social sector already. Overcrowding is a known issue in this sector, the report establishes. A shortage of larger homes can make finding a suitably sized home more difficult for families as a result of the sale of council housing and a decrease in government funding for building new social homes since 2010.
- 3.135 This is because larger, family homes are more expensive to build and therefore more difficult to build with less government funding. The ‘spare bedroom subsidy’ has also acted as an incentive for developers to build smaller homes. Given the freeze on

working-age benefits (introduced in 2016 following the 2015 Budget), benefits sometimes *'no longer cover even the cheapest forms of social housing rent'*, the report finds (page 6).

- 3.136 Meanwhile the analysis finds that nearly 1.9 million households are hosting a 'concealed' household, and that concealed households make up the third largest group of people affected, including nearly 1.8 million single people concealed within a total of nearly 1.5 million host households.
- 3.137 Across different tenures, when examining the proportions relative to the size of each tenure, the report finds that problems are more prevalent in the rented sectors, particularly the private rented sector, *'where more than a quarter of households have some form of housing need'* (page 6).
- 3.138 In addition, when the report looks at those households with needs for whom social rent is the most appropriate tenure, 18.8% of private renting households are in this position compared to 11.6% of social renters and just 1.3% of homeowner households.
- 3.139 Within the private rented sector, affordability, unsuitability and overcrowding are the most frequent issues. In particular, the wider measure of affordability (using an additional higher threshold) shows up highly, as does the measure of unsuitability for the age and health of the occupant.

Speech by former Secretary of State for Housing, Communities and Local Government to the Creating Communities Conference 2020 (September 2020)

- 3.140 The former Secretary of State, Robert Jenrick, reiterated the importance of affordability in a speech he gave to the Creating Communities Conference 2020.
- 3.141 In the speech, Jenrick made clear that *'We owe it to the next generation to radically reform the existing system, so we can offer them a future where our children and grandchildren can afford to own their own home.'*

Speech by the Minister for Housing to the District Councils' Network (October 2020)

- 3.142 The former Housing Minister, Christopher Pincher, gave a speech to the District Councils' Network explaining why the Government is seeking reforms to the planning system. In explaining why the Government is considering a revised methodology for calculating housing need, Pincher noted the work of KPMG and Shelter, stating that *"Local plans do not provide for the ambition we have – 300,000 new homes each*

year – nor enough to meet the demands of organisations and such as KPMG and Shelter, both of which say we need to be building north of 250,000 homes a year to deal with the housing challenges that we have”.

- 3.143 Pincher also emphasised the need to address poor housing affordability, particularly that observed in the South and the South East. He explained that in calculating housing need under the Government’s proposed methodology, that *“Fundamentally the initial driver, the first driver of need, must be affordability because there are parts of our country, not just in the south and the south east, where the affordability is low and people who want and need to live in a certain place and work in that place cannot afford to do so”.*

Minister of State for Housing Speech at Savills Annual Housing Seminar (24 November 2020)

- 3.144 The then- Housing Minister, Christopher Pincher, gave a speech to Savills Annual Housing Seminar about the government's strategy for housing.
- 3.145 The Minister made clear that the coronavirus pandemic only reinforced the need to double our efforts to build more quality homes with strong and sustainable communities, which are needed now *“more urgently than ever”.*
- 3.146 The Minister continued, that that means *“keeping up the pace on supply”* to make up for ground lost and that notwithstanding the emergency and the challenges to the economy the Government’s target of building 300,000 new homes of all types and tenures each year by the middle of this decade must be met, so that people can *“afford to buy or afford to rent the sorts of homes that they want to be able to provide them with the security and the opportunity that they want and need”.*

Coming Home – Tackling the housing crisis together (February 2021)

- 3.147 The report by the independent Commission on Housing, Church and Community lays out a positive vision for housing. The vision is centred on five core values, which are rooted in the Christian story but resonate with us all: good housing should be sustainable, safe, stable, sociable and satisfying.
- 3.148 At the heart of the report is the idea that simply building more houses, whilst important, is not sufficient to address the prolonged housing issues this country continues to face. The report suggests that we need more truly affordable homes and stronger communities that people can be proud of and where they can feel safe and welcome, put down roots and flourish.

- 3.149 Chapter 8 focuses on what Government can do, it recommends six actions for the Government to consider, these include, that the Government should develop a coherent, long-term housing strategy, focusing particularly on those in the greatest need. It recommends a full review of the social security system to ensure it provide adequate housing support for low- income households and that all public land should maximise its long term social, environmental and economic value, not simply be sold for the highest achievable price.
- 3.150 It is this Commission’s contention that we all need to start to think differently, and act differently, if the next 20 years are not simply to be a re-run of the last 20. It states that:

“The housing problems in our society, which have been consistently documented for many years, must not continue to be borne solely by those living in unaffordable or inadequate housing, while nearly everyone else – the Church included – continues to act largely in their own interests, and effectively perpetuates this injustice”.

Former Secretary of State for Communities, Housing and Local Government’s speech to the National Housing Federation (25 March 2021)

- 3.151 The former Secretary of State for Communities, Housing and Local Government, Robert Jenrick, addressed the National Housing Federation on the subject of *‘building back better – fairer, and safer and with opportunity for all’*.
- 3.152 Jenrick identified the need to strengthen the safety net that social housing has always provided, while also extending the ladder of opportunity that has always been there. He stated that this means *“we must ensure that more affordable and social housing gets built”* (my emphasis).
- 3.153 The former Secretary of State made clear that the Government is *“determined to do all we can to support you – social landlords who make an important contribution to housing delivery – to keep up the momentum on supply”* to ensure that homes are completed and that new properties are started” (my emphasis).
- 3.154 Jenrick went on to say (referring to the Coronavirus pandemic) that what has happened over the past year has made this an *“even more urgent, even more important mission for the country”*.

- 3.155 The Secretary of State identified the opportunity for housing associations to build the homes we need, whether for rent, whether for shared ownership or indeed for outright ownership as well – and not just in urban areas.
- 3.156 Jenrick identified that from 2015 to 2019, just over 10% of new affordable homes have been built in villages accommodating around 3,000 people. He made clear that *“I’d like to go much further than that in the years ahead”*.
- 3.157 Jenrick concluded that the Government’s mission to build back better and to level up all parts of the country *“will, in no small part, be powered by the provision of more affordable housing”* (my emphasis).

Ministry of Housing, Communities and Local Government, Press Release (19 April 2021)

- 3.158 This press release outlines that a new government-backed mortgage scheme to help people with a 5% deposit buy a house (up to the value of £600,000) is now available from high street lenders across the country. It explains that when asked 69% of private renters and 63% of those living at home who had looked into a mortgage said they cannot find many mortgages with a low deposit. The 95% mortgage scheme aims to make home ownership more accessible.
- 3.159 The former Secretary of State for Communities, Housing and Local Government, Robert Jenrick stated that *“For too many people, no matter how hard they work, home ownership can seem out of reach. One of the biggest divides in our country has been between those who can afford their own home and those who cannot.”* (my emphasis).
- 3.160 Jenrick concluded that *“In recent years we’ve reversed the trend and seen a positive increase in owner-occupiers. We’re determined to build on this through the range of flexible ownership options which help ensure home ownership is achievable. We want to match the ambitions of aspiring homeowners up and down the country. Together we can turn ‘Generation Rent into ‘Generation Buy”*.
- 3.161 The press release explains that the government intervention comes as new figures published by the government show a greatly increased desire for home ownership and a sharp reduction in 95% mortgage availability over the past year.

Denied The Right to a Safe Home – Exposing the Housing Emergency, Shelter (May 2021) (CD-I19)

- 3.162 This report by Shelter identifies what it describes as the Housing Emergency, with 1 in 3 adults (17.5 million people) being denied the right to safe home. These people are trapped by the Housing Emergency.
- 3.163 Page 4 of the Report explains that Shelter commissioned research with 13,000 people to bring to light the extent of the Housing Emergency. This found that one in seven had to cut down on essentials like food to pay the rent or mortgage and 6% lived in a home that harms their family’s physical health.
- 3.164 It goes on to identify on page 5 that the high cost of housing is the main cause of homelessness. Housing benefit was designed to ‘take the strain’ of unaffordable rents but restrictions mean it is well below what’s needed, which it describes as a *“recipe for rising poverty and homelessness”* where *“too many are forced to choose between rent and feeding their families”*.
- 3.165 It found that 14% of people saying that they regularly have to cut spending on household essentials like food or heating to pay their rent or mortgage payments.
- 3.166 The Report (on page 10) calls for the Government to commit to building at least 90,000 new social homes in England a year, making very clear that: *“Something needs to change. We need to end the housing emergency. We need social housing. For the thousands stuck in bad homes. For the renters terrified of losing their home. For everyone facing discrimination. For everyone denied the right to a safe home. We will only end the housing emergency by building affordable, good quality social homes”*.
- 3.167 In respect of the private rented sector, Shelter identified (page 13) that as people are priced out of the housing market, the number of households renting privately more than doubled between 2000 and 2019 from 2 million to 4.4 million – or 1 in 5 of us.
- 3.168 It found that private renters spend the most of their income on housing, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%). Furthermore, private rented homes are more likely to fail the Decent Homes Standard.
- 3.169 Shelter highlight the problems of discrimination, with landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone

claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.

- 3.170 Shelter also identifies (page 26) the benefits of social housing compared with alternative forms such as private renting. Of those privately renting, 43% of families worry about their landlord ending their contract early, and this is a constant possibility.
- 3.171 Social housing is more stable and people in social homes have longer and more secure tenancies. Families can plan for the future without fear of losing their home. Social housing is also quality controlled, being more likely to meet the standard for 'decent' housing. It states that a new generation of quality social homes could set the gold standard for liveable housing.
- 3.172 Shelter state that for generations, this country has failed to build enough social homes. There are over one million people in England on the waiting list, and the lack of social housing has pushed people into expensive and insecure private renting.
- 3.173 On Page 32 the Report highlights that a safe home for everyone is what Shelter fights for, but 17.5 million people are denied that right. Whether because of the cost of rent, being forced to live in unsafe conditions, or because they've been discriminated against because of their class, disability, gender, sexuality or race.
- 3.174 The Report concludes (page 33) that for change to happen, "*we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there's only one way to end the housing emergency. **Build more social housing***" (emphasis in original).

The Centre for Social Justice: Exposing the Hidden Housing Crisis (November 2021)

- 3.175 The report found that the "*collapse in the supply of decent, affordable homes*" for people living on modest to low incomes has not just made homeownership less attainable. It has made it harder to start and maintain healthy families, to thrive in work, and to provide an educational foundation for children. The thinktank identified that 'tonight', over 90,000 families and more than 120,000 children will go to sleep in 'temporary accommodation', and that an estimated 150,000 properties see parents sharing a bedroom with their children.
- 3.176 Section 1.3 of the report discusses how high housing costs have critically undermined the impact of positive government initiatives to raise incomes among

lower earners, constituting a key driver of ‘in-work poverty’. A quarter of the English population said they found it either fairly or very difficult to pay their housing costs, this rising to 43% of private renters; a group of individuals where 60% have less than £100 in savings.

3.177 Chapter four of the report reviews the attitudes to housing affordability among the public. The report survey found that:

- 60% of those surveyed think the housing crisis has worsened ‘significantly’ due to the pandemic;
- 63% believe the Government needs to supply low-cost homes to rent to end the housing crisis;
- 55% said building social housing should be a priority of the Government;
- 58% said building more low-cost homes to rent would ‘level up’ the country;
- 55% of people said ‘affordability’ should be the primary aim of housing policy, while 11% said ‘eventual ownership’; and
- The public most highly associates social housing with being ‘affordable’ (44%) and providing ‘community’ (28%). Other popular positive answers included ‘safe’ (18%) and ‘comfortable’ (16%).

3.178 On page 7 the report identifies that expenditure on housing benefits is forecast to be £30.3 billion by 2021–22. This is more than double the total government grant allocated (£11.5 billion) for new affordable housing until 2026, in just one year. The research further alluded that it warned that the annual housing benefit bill could reach £50bn by 2050.

3.179 Prefacing the report, Former Prime Minister Theresa May stated in her Foreword that her party’s focus on homeownership had become a distraction and that rediscovering affordable housebuilding for the 2020s is what is needed if we are to address the social, economic and fiscal costs of the hidden housing crisis.

3.180 The report recommends that the government initiates a process of rapid evidence-gathering to reshape social housing policy for the 2020s with the forthcoming Levelling Up White Paper.

House of Lords: Built Environment Committee (1st Report of Session 2021-2022): Meeting housing demand (10 January 2022)

- 3.181 The report by the House of Lords Built Environment Committee considers extensive evidence in respect of the delivery and affordability of housing and the functioning of the wider housing market. The report found that *“The challenges facing the housing market have been well documented: too many people are living in expensive, unsuitable, poor quality homes. To address these complex challenges in the long term, it is necessary to increase housing supply now.”* (summary – page 4).
- 3.182 Chapter two (Housing demand and demographic trends) concludes that the Government’s target to deliver 300,000 new homes per year and one million homes by 2025 is welcomed. However, *“even with increased development through SMEs, ‘build to rent’, self-commissioned homes and local authorities, building will likely still fall short of the target.”*
- 3.183 Chapter three (Housing types and tenures) sets out that over the past 40 years the private rented sector has doubled in the UK, with social rented dwellings halving over the same period (paragraph 39). Paragraph 41 explains that homeownership is becoming increasingly unaffordable as growth in house prices has outstripped growth in wages.
- 3.184 The report identifies that those living in the private rented sector are more likely to live in poor quality, overcrowded conditions than owner-occupiers (Paragraph 61). The report highlights a serious shortage of social housing, which is reflected in long waiting lists for social homes and a large number of families housed in temporary accommodation (paragraph 76). Chapter three goes on to state *that “Right to Buy has left some councils unable to replace their social housing stock. Right to Buy must be reformed to help councils replenish their social housing stock: councils should keep more of the receipts from Right to Buy sales, have a longer period to spend the receipts, and there should be tighter restrictions on the conditions under which social homes can be bought.”*
- 3.185 Chapter five (planning) concludes that uncertainty about the future of the planning system and delays to planning reforms have led to a ‘chilling effect’ on housebuilding and created uncertainty for planners and housebuilders (paragraph 118). It goes on to state that *“Only 40% of local plans are less than five years old or have been updated or reviewed in the past five years. The lack of local plan-making means the system is not ‘plan led’ and creates an uncertain environment for housebuilders.”* (paragraph 122).

3.186 Paragraph 41 outlines the overall conclusions of the report and states that *“Evidence to our inquiry has shown how vital it is that that new homes are built to help meet housing demand. Building more homes will not address affordability pressures in the short term but is an essential first step to ensure that demand can be met in the long term.”* Paragraph 42 goes on to explain that *“To meet that challenge, the sector needs certainty and a clear direction from the Government about reforms to the planning system and more resources to address chronic delays.”*

Conclusions on the National Housing Crisis

3.187 There is an ever-increasing wealth of evidence including from figures at the highest levels of Government that unaffordability and inability to get on the housing ladder is a significant problem.

3.188 What is also clear is that the messages from previous Governments have failed to ensure enough new homes, especially affordable homes, are being built.

3.189 The evidence is clear and, in my opinion, demonstrates the pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable.

3.190 Evidence suggests that failure to do so will present a risk to the future economic and social stability of the United Kingdom.

The Extent of the National Shortfall in Housing Delivery

Section 4

4.1 In a speech to the House of Commons on 24 October 2013 the former Planning Minister, Nick Boles, referred to *“the scale of the housing crisis faced by this country”* and *“the extent of the need for housing”*.

4.2 The extent of the need for housing and the scale of the crisis as a result of the persistent under delivery of both market and affordable housing in the UK is explored further in this section of my evidence, starting over 17 years ago with Dame Kate Barker’s Review of Housing Supply in March 2004.

The Barker Review of Housing Supply (17 March 2004)

4.3 In her 2004 review into issues underlying the lack of supply and responsiveness of the housing in the UK, Barker reported that housing is a basic human need, fundamental to our economic and social well-being. She found that:

- A weak supply of housing contributes to macroeconomic instability and hinders labour market flexibility;
- Housing has become increasingly unaffordable over time, noting that the aspiration for home ownership is as strong as ever, yet the reality is that for many this aspiration will remain unfulfilled unless the trend in real house prices is reduced;
- This brings potential for an ever widening social and economic divide between those able to access market housing and those kept out; and
- Homes are more than shelter. They provide access to a range of services and to communities. Housing also plays a major role as an asset in household’s balance sheets and in household planning for their financial futures.

- 4.4 Barker considered that continuing at the current rate of housebuilding was not a realistic option:
- “Unless we are prepared to accept increasing problems of homelessness, affordability and social division, decline in standards of public service delivery and increasing costs of doing business in the UK – hampering our economic success”.*
- 4.5 She found that whilst demand for housing is increasing over time, driven by demographic trends and rising incomes, in 2001 the construction of new houses in the UK fell to its lowest level since the Second World War.
- 4.6 A weak response of housing supply to demand changes has been one of the factors underlying the instability of the UK housing market with Barker reporting that *“there is growing evidence of a persistent inadequate supply”* noting that in the UK the trend rate of real house price growth over the past 30 years had been 2.4% compared to the European average of 1.1%
- 4.7 She found that affordability has worsened and that in 2002 only 37% of new households could afford to buy a property compared to 46% in the late 1980s. The overall objective of the Barker Review included:
- To achieve improvements in housing affordability in the market sector;
 - A more stable housing market; and
 - An adequate supply of publicly funded housing for those who need it.
- 4.8 Taking the baseline level of private sector housing built in 2002/03 of 140,000 gross starts and 125,000 gross completions, Barker estimated that:
- Reducing the trend in real house prices to 1.8% would require an additional 70,000 private sector homes per annum; and
 - More ambitiously, to reduce the trend in real house prices to 1.1% an additional 120,000 private sector homes per annum would be required.
- 4.9 Even in the case of the less ambitious price trend, Barker found that this would include pricing an additional 5,000 new households into the market each year and improving the access for the backlog of those currently priced out.
- 4.10 She found that an increase in supply of 17,000 affordable homes per annum would be required to meet the needs among the flow of new households, noting that there

is also a case for the provision of up to 9,000 affordable homes per annum above this rate in order to make inroads into the backlog of need, a total of 26,000 per annum

4.11 Barker presented three scenarios for real house price trends ranging from slowing the rate at which households were being priced out to a long-term reduction of house price inflation:

- 2.4% per annum – which represented the Government’s target aimed at slowing the rate at which households were being priced out of the market, would have required an increase in housebuilding to 160,000 per annum;
- 1.8% per annum – to reduce the long-term trend would have required an increase in housebuilding to 200,000 per annum; and
- 1.1% per annum – which represented the EU average at the time, and which was considered would ‘improve the housing market’ would have required an increase in housebuilding to 260,000 per annum.

4.12 Meeting Barker’s most optimistic objective of improving the housing market and pricing many more households back into the marketplace would have required an estimated 260,000 homes per annum.

The Barker Review: A Decade On (24 March 2014)

4.13 In March 2014, the Home Builders Federation (HBF) undertook a review of housing delivery against the findings of the Barker Review and the impacts of this upon the market and affordability. They found that by 2004 the housing crisis was already building and in the 10 years since then, even against the most modest of the housing targets identified by Barker (which was met only once in 2005/06), the average annual shortfall has been 45,000 homes.

4.14 Measured against the objective of improving the housing market, housebuilding had been an average of 145,000 per annum down on the target of 260,000 per annum over the period between 2004 and 2014.

4.15 The HBF found that when measured against the middle of Barker’s three price inflation targets for 200,000 per annum, the shortfall of homes over the decade stood at 953,000 homes in 2014. This was on top of a backlog that had already been identified as being large (estimated at between 93,000 and 146,000) and growing in 2004.

- 4.16 They reported that in 2014 even if housebuilding rose to 210,000 per annum overnight, assessed against the middle objective of reducing the long-term rate of inflation, the country would be four and a half years behind where it was in 2004.
- 4.17 In 2014, the HBF found that a decade on from the Barker Review, the UK was 1.45 million homes short of where Kate Barker projected would have brought about an improved housing market.
- 4.18 The HBF reported that a basic estimate would suggest that in order to achieve the very modest objective of slowing the increase in the affordability gap so that fewer new households are priced out of the market, in 2014 some 200,000 private household starts would be required, a figure last achieved in 1972/73.
- 4.19 It goes further to detail that the objective of improving the housing market would, in 2014, have required 320,000 private housing starts per annum, a figure achieved in England only four times since World War II.

Building the Homes We Need (April 2014)

- 4.20 The KPMG and Shelter research was intended to provide a package of new housing policies to inform the new 2015 Government.
- 4.21 It reported that each year an average of 100,000 fewer homes are built that are needed which adds to a shortfall which has been growing for decades, noting that growing demand means that without a step-change in supply we will be locked into a spiral of increasing house prices and rents, making the housing crisis worse.
- 4.22 Because of private housing becoming less affordable, the number of people in need of affordable housing has grown and with the failure of successive governments to deliver new social housing whilst existing stock continues to be depleted through the Right to Buy, waiting lists have grown whilst social housing stock has shrunk as illustrated by figure 4.1¹.

¹ Reduction in total numbers on housing waiting lists in 2013 as a result of local authorities utilising the freedoms afforded to set their own housing allocation criteria through the Localism Act.

Figure 4.1: Social Housing Waiting Lists and Stock



Source: Building the Homes We Need (2014)

4.23 KPMG and Shelter found that changing demographics meant that we need to build a minimum of 250,000 new homes per annum in England to meet rising demand. In 2013 (the most recent monitoring period available at the time of publication of the report) just 109,660 new homes were built, the lowest annual level since 1946, the year of recovery after the Second World War.

4.24 In addition to which the report found that estimates suggest that the backlog of housing need may be as large as two million households and that to clear this England would need to build well over 250,000 homes each year, which would require doubling current output at the time of publication of the report.

The House of Lords Select Committee on Economic Affairs: Building More Homes (15 July 2016)

4.25 The Select Committee found that a growing population, rising immigration and rising incomes have increased demand for housing in England in recent decades but that too few homes have been built over this period. As a result, house prices and rents have risen sharply and there has been a decline in home ownership over the past decade.

4.26 They considered that we must build enough homes to make housing more affordable for everyone, noting that aspirant home owners who are unable to afford a deposit pay substantial proportions of their income on rent, families on waiting lists of social housing contend with insecure tenancies and rogue landlords, and at the same time housing benefit spending has doubled in the past two decades.

4.27 The Lords reported that as former Housing and Planning Minister Brandon Lewis had explained to them, the Government aimed to address the problems by building one

million homes by the end of Parliament. However, it was noted that since the Brexit vote the Minister had effectively abandoned this target and prior to the vote had warned that it would be difficult to achieve if the UK voted to leave the European Union.

- 4.28 In addition to this the Committee found that whilst the Government's ambition was welcomed, it must be matched by appropriate action on a much larger scale than currently envisaged and across all tenure. They considered that the Government was focused on building for home ownership and therefore neglecting housing for affordable and social rent.
- 4.29 It was reported that it had been 10 years since 200,000 homes (the implied annual rate from the Government's target) were added to the housing stock in a single year, but the evidence suggested that this will not be enough to meet future demand and the backlog from previous years of undersupply.
- 4.30 The Select Committee found that in order to meet demand and have a moderating effect on house prices, at least 300,000 homes a year need to be built for the foreseeable future otherwise the age of a first-time buyer will continue to rise. The main conclusions of the Select Committee included that:

"The Government's target of one million new homes by 2020 is not based on a robust analysis. To address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future. One million homes by 2020 will not be enough".

National Housing Federation Press Release: 'England Short of Four Million Homes' (18 May 2018)

- 4.31 The NHF press release² reported that new figures reveal the true scale of the housing crisis in England and that the research (conducted by Heriot-Watt University) shows that England's total housing backlog has reached four million homes.
- 4.32 They report that in order to both meet this backlog and provide for future demand, the country needs to build 340,000 homes per year until 2031, noting that this is significantly higher than current estimates which have never before taken into account the true scale of housing need created by both homelessness and high house prices.

² <https://www.housing.org.uk/press/press-releases/england-short-of-four-million-homes/>

- 4.33 However, the NHF is clear that these need to be the right type of houses with a need for 145,000 of these new homes per year to be affordable homes, compared to previous estimates of annual affordable housing need of around 78,000 homes. It reports that this means around two fifths (or 40%) of all new homes built every year must be affordable homes, yet in 2016/17 only around 23% of the total built were affordable homes.
- 4.34 The research breaks down exactly what type of affordable homes are needed:
- 90,000 per annum should be for social rent;
 - 30,000 per annum should be for intermediate affordable rent; and
 - 25,000 per annum should be for shared ownership.
- 4.35 Reference was drawn to the September 2017 announcement by the former Prime Minister Theresa May that £2 billion will be invested in affordable housing and indicating that this could deliver around 25,000 new homes for social rent over three years, however the NHF report that even when this funding is made available, the research shows that it would deliver less than 10% of the social rented homes needed each year.
- 4.36 Government funding for social housing has been steadily declining for decades. In 1975/76 investment in social housing stood at more than £18 billion a year but had declined to just £1.1 billion in 2015/16. Over the same period, the housing benefit bill grew from £4 billion to £24.2 billion each year.
- 4.37 The NHF set out that homeownership rates have plummeted among young people, rough sleeping has risen by 169% since 2010 and that unless the Government takes steps to deliver more private, intermediate and social housing, the number of households in temporary accommodation is on track to reach 100,000 by 2020.
- 4.38 A series of quotes accompany the NHF press release from senior industry professionals, summaries of which are detailed below:
- David Orr, Chief Executive of the NHF – *“This ground-breaking new research shows the epic scale of the housing crisis in England”.*
 - Jon Sparkes, Chief Executive of Crisis – *“Today’s findings are stark and shocking, but they also represent a huge opportunity for us as a country to get to grips with our housing and homelessness crisis – and to end it once and for all”.*

- Terrie Alafat CBE, Chief Executive of the Chartered Institute of Housing – *“This new report once again highlights the chronic housing shortage we face in the UK and it is clear that only a bold and ambitious plan to solve the housing crisis will prevent a decent, genuinely affordable homes being out of reach for our children and their children.”*
- Campbell Robb, Chief Executive of the Joseph Rowntree Foundation – *“It is unacceptable that currently in our society millions of people are locked out of being able to afford a decent and secure home. For years our failure to deliver enough affordable housing in England has led to rising levels of poverty and homelessness across our country.”*
- Polly Neate, Chief Executive of Shelter – *“We are in the midst of a housing emergency where an entire generation faces a daily struggle for a decent home...Government can turn things around but only by building many more of the high quality, genuinely affordable homes this country is crying out for”.*

Ministry of Housing, Communities and Local Government Single Departmental Plan (27 June 2019)

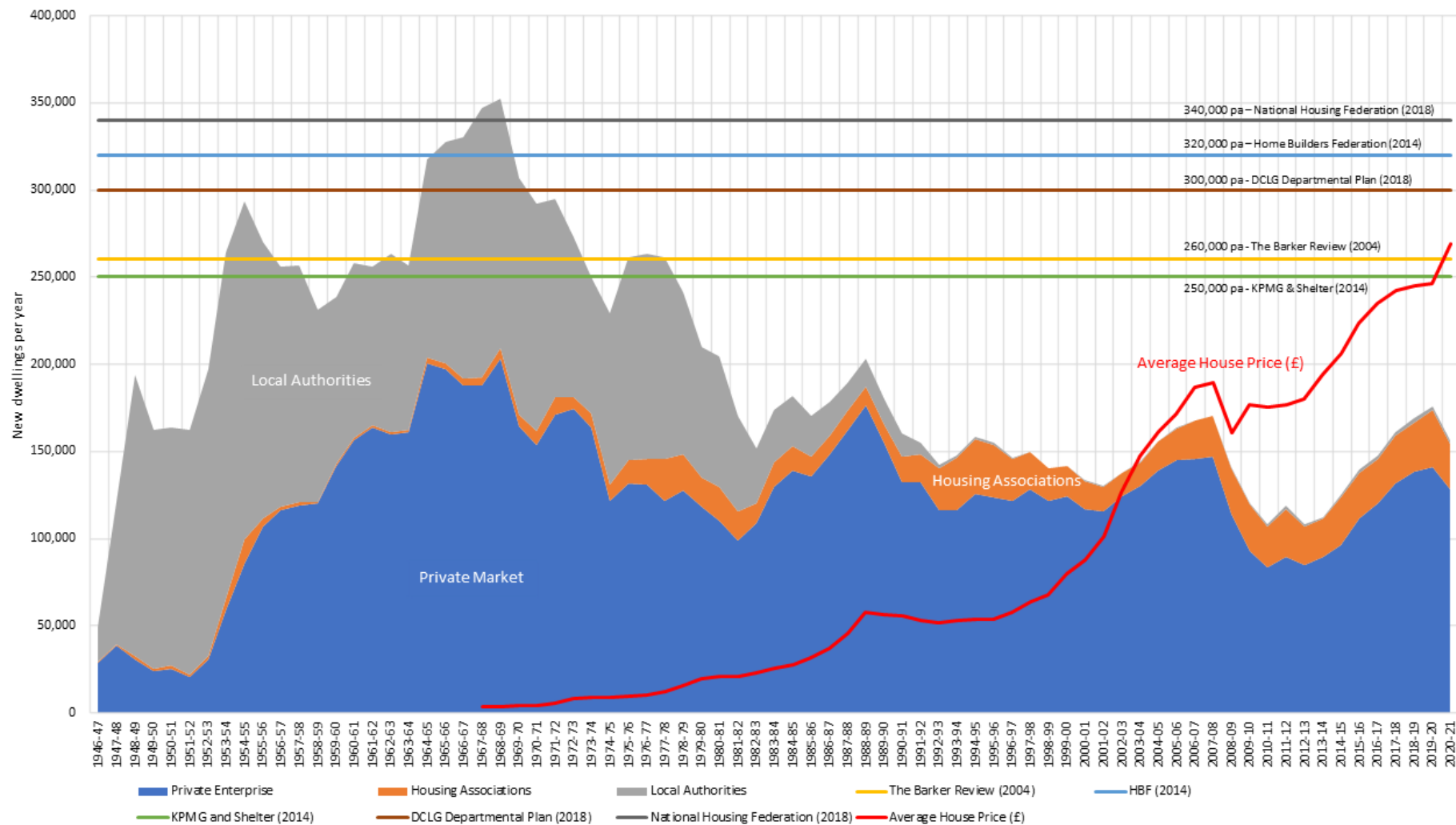
- 4.39 The Ministry³ Single Departmental Plan outlines its objectives which include to *“deliver the homes the country needs”* and to *“make the vision of a place you call home a reality.”*
- 4.40 Under the objective of delivering the homes the country needs, the Plan states that the Ministry will:
- “Support the delivery of a million homes by the end of 2020 and half a million more by the end of 2022 and put us on track to deliver 300,000 net additional homes a year on average by the mid-2020s, to help increase affordability.”*
- 4.41 The Departmental Plan clearly outlines the Government’s aim to deliver 300,000 new homes per annum in order to address the housing crisis in England.

³ The Ministry of Housing, Communities and Local Government was renamed Department for Levelling Up, Housing and Communities (DLUHC) in September 2021.

The National Housing Shortfall

- 4.42 Over the course of the past 17 years a series of industry leading professionals and figures at the highest level of Government have identified that there is a need for between 200,000 to 340,000 homes per annum to address the housing crisis that has engulfed the country. Figure 4.2 below illustrates the level of house building in England between 1946 and 2020 and compares delivery over this period with the range of annual housing needs identified between 2004 and 2020, the most recent of which of course being the Government's own Department for Levelling Up, Housing and Communities ("DLUHC") target for 300,000 new homes per annum.

Figure 4.2: House Building in England 1946 to 2021



Source: DLUHC Live Table 209; DLUHC Live Table 253; HM Land Registry (2021); The Barker Review (2004); HBF (2014); Building the Homes We Need, KPMG & Shelter (2014); MHCLG Single Departmental Plan (2019); NHF (18 May 2018).

- 4.43 Figure 4.2 shows that the Government's current target of 300,000 new homes per annum is a figure that the country has not seen achieved since the mid to late 1960s. Whilst housing completions have generally been increasing since around 2011, they are still a long way short of meeting the level of housing delivery that is desperately needed to address the housing crisis in this country. Furthermore, completions dropped in the 2020-21 monitoring year, coincident with the Covid-19 pandemic; the first recorded fall since 2012-13.
- 4.44 At Figure 4.3 net additional dwellings in England since 2004 sourced from DLUHC Live Table 122 are compared with the annual need figures identified in the Barker Review (2004), the KPMG & Shelter research (2014), the HBF research (2014), the NHF research (2018), and the MHCLG Single Departmental Plan (2019).
- 4.45 The results are stark. The lowest of the annual need figures since 2004, that of the KPMG/Shelter report of 250,000 homes per annum, results in a shortfall of -1,140,069 homes in the past 18 years. To put this into context, this is equivalent to:
- 96% of the total number of households on local authority Housing Registers in the whole of England⁴; and
 - Almost four times the total number of homes across the entire County of Oxfordshire⁵.
- 4.46 At the other end of the scale, the need for 340,000 homes per annum most recently identified in the NHF research results in a shortfall figure of -2,760,069 homes. This is equivalent to more than twice the total number of homes in the entire West Midlands metropolitan area⁶.
- 4.47 When the Government's most recently published target of 300,000 home per annum taken from the MHCLG 2018 Single Departmental Plan is used for comparison, there has been a shortfall of -2,040,069 homes since 2004. To put this into context, this is equivalent to:
- More than 1.7 times the number of households on local authority Housing Registers in the whole of England (see footnote 4); and
 - More than one-and-a-half times the total number of homes in Greater Manchester⁷.

⁴ Source: DLUHC Live Table 600 – 1,187,641 households on Housing Registers in England at 1 April 2021

⁵ Source: DLUHC Live Table 100 – 300,806 homes in Oxfordshire at 1 April 2020

⁶ Source: DLUHC Live Table 100 – 1,184,150 homes in West Midlands at 1 April 2020

⁷ Source: DLUHC Live Table 100 – 1,237,582 homes in Greater Manchester Metropolitan County at 1 April 2020

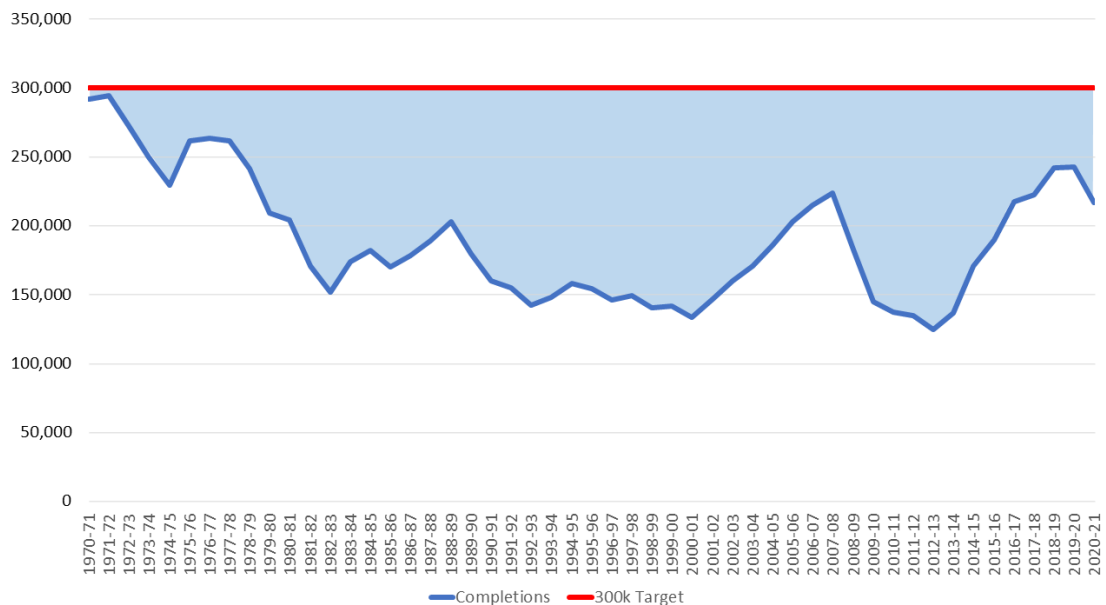
Figure 4.3: National Housing Shortfall Comparison

Year	Net Additions	KPMG/Shelter (2014) 250,000 pa		Barker Review (2004) 260,000 pa		MHCLG Departmental Plan (2019) 300,000 pa		The HBF (2014) 320,000 pa		NHF Research (2018) 340,000 pa	
		Annual	Cumulative	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative
03/04	170,969	-79,031	-79,031	-89,031	-89,031	-129,031	-129,031	-149,031	-149,031	-169,031	-169,031
04/05	185,553	-64,447	-143,478	-74,447	-163,478	-114,447	-243,478	-134,447	-283,478	-154,447	-323,478
05/06	202,653	-47,347	-190,825	-57,347	-220,825	-97,347	-340,825	-117,347	-400,825	-137,347	-460,825
06/07	214,936	-35,064	-225,889	-45,064	-265,889	-85,064	-425,889	-105,064	-505,889	-125,064	-585,889
07/08	223,534	-26,466	-252,355	-36,466	-302,355	-76,466	-502,355	-96,466	-602,355	-116,466	-702,355
08/09	182,767	-67,233	-319,588	-77,233	-379,588	-117,233	-619,588	-137,233	-739,588	-157,233	-859,588
09/10	144,870	-105,130	-424,718	-115,130	-494,718	-155,130	-774,718	-175,130	-914,718	-195,130	-1,054,718
10/11	137,394	-112,606	-537,324	-122,606	-617,324	-162,606	-937,324	-182,606	-1,097,324	-202,606	-1,257,324
11/12	134,896	-115,104	-652,428	-125,104	-742,428	-165,104	-1,102,428	-185,104	-1,282,428	-205,104	-1,462,428
12/13	124,722	-125,278	-777,706	-135,278	-877,706	-175,278	-1,277,706	-195,278	-1,477,706	-215,278	-1,677,706
13/14	136,605	-113,395	-891,101	-123,395	-1,001,101	-163,395	-1,441,101	-183,395	-1,661,101	-203,395	-1,881,101
14/15	170,693	-79,307	-970,408	-89,307	-1,090,408	-129,307	-1,570,408	-149,307	-1,810,408	-169,307	-2,050,408
15/16	189,645	-60,355	-1,030,763	-70,355	-1,160,763	-110,355	-1,680,763	-130,355	-1,940,763	-150,355	-2,200,763
16/17	217,345	-32,655	-1,063,418	-42,655	-1,203,418	-82,655	-1,763,418	-102,655	-2,043,418	-122,655	-2,323,418
17/18	222,281	-27,719	-1,091,137	-37,719	-1,241,137	-77,719	-1,841,137	-97,719	-2,141,137	-117,719	-2,441,137
18/19	241,877	-8,123	-1,099,260	-18,123	-1,259,260	-58,123	-1,899,260	-78,123	-2,219,260	-98,123	-2,539,260
19/20	242,702	-7,298	-1,106,558	-17,298	-1,276,558	-57,298	-1,956,558	-77,298	-2,296,558	-97,298	-2,636,558
20/21	216,489	-33,511	-1,140,069	-43,511	-1,320,069	-83,511	-2,040,069	-103,511	-2,400,069	-123,511	-2,760,069
Total Shortfalls Since 2004 compared to:		KPMG/Shelter Research	-1,140,069	The Barker Review	-1,320,069	MHCLG Departmental Plan	-2,040,069	The HBF	-2,400,069	NHF Research	-2,760,069

Source: DLUHC Live Table 122; HM Land Registry; The Barker Review (2004); HBF (2014); Building the Homes We Need, KPMG & Shelter (2014); NHF (18 May 2018); MHCLG Single Departmental Plan (2019)

4.48 It is widely accepted that 300,000 new homes are needed per annum and have been for quite some considerable time as set out above. The last time the country built more than 300,000 homes was in 1969. Since that time there has arisen an accumulated shortfall of 5,626,760. This 50-year duration accumulated shortfall is set out in Figure 4.4 below.

Figure 4.4 National Housing Shortfall since 1970/71



Source: DLUHC Live Tables 122

Conclusion on the Extent of the National Housing Shortfall

- 4.49 The evidence before the Inspector shows that in every scenario, against every annual need figure, the extent of the shortfall in housing delivery in England is staggering and merely serves to further compound the acute affordability problems that the country is facing.
- 4.50 It is my view that what is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is absolutely essential to arrest the housing crisis and prevent further worsening of the situation.

The Development Plan and Related Policies

Section 5

Introduction

- 5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the appeal should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The Development Plan for North Somerset comprises:
- North Somerset Core Strategy 2006-2026, adopted April 2012 (**CD-G1**), which contains the strategic policies for development in North Somerset including the principal policies for affordable housing;
 - Sites and Policies Plan, Part 1: Development Management Policies, adopted July 2016 (**CD-G2**), which sets out detailed development management policies pursuant to the Core Strategy; and
 - Sites and Policies Plan, Part 2: Site Allocations Plan adopted April 2018 (**CD-G3**), which allocates sites for development pursuant to the Core Strategy.
- 5.3 In Backwell, the Backwell Neighbourhood Plan (**CD-G4**) also forms part of the Development Plan, having been made in 2015.
- 5.4 Other material considerations include:
- The emerging Local Plan, a draft of which was published in February 2022 for consultation later in Spring 2022 (**CD-H1**);
 - the National Planning Policy Framework (2021) (**CD-F1**) and the Planning Practice Guidance (**CD-F2**);
 - Affordable Housing Supplementary Planning Document adopted November 2013 (**CD-I11**); and
 - Corporate documents prepared by the Council, including:
 - North Somerset Corporate Plan 2020-2024 (**CD-I12**);
 - Housing Strategy 2016-2021 (**CD-I13**);

- Draft Housing Strategy 2022-2027 (**CD-I14**);
- North Somerset Preventing Homelessness Strategy 2017-2022 (**CD-I15**); and
- Sustainable Community Strategy 2008-2026 (**CD-I16**).

Core Strategy 2006-2026 (CD-G1)

- 5.5 The Core Strategy was adopted in 2012 and covers a 20 year period from 2006 to 2026. Nine policies relating to the overall amount and distribution of housing were remitted for re-examination following a legal challenge, and these policies were re-adopted in 2015 and 2017.
- 5.6 The Introduction at Chapter 1 of the Core Strategy sets out a brief overview of the characteristics of North Somerset. Paragraph 1.16 at page 11 of the Core Strategy notes that housing affordability in the authority area is a challenge; it states that *“There are serious housing affordability issues with affordable housing completions falling well below the required amount”*.
- 5.7 The Visions and Objectives for the Core Strategy are set out at Chapter 2. Vision 1 at page 15 is the authority-wide vision for North Somerset; it states that *“By 2026 North Somerset will be a more prosperous district, with reduced inequalities throughout”*.
- 5.8 A set of ten Priority Objectives are listed at page 20 of the Core Strategy. Priority Objective 1 relates to housing and seeks to *“Deliver sustainable housing development across North Somerset to meet housing needs, through the provision of a minimum of 20,985 new homes by 2026”*.
- 5.9 **Policy CS16 Affordable Housing** is the principal affordable housing policy in North Somerset. Its key provisions are:
- On-site affordable housing to be sought on all residential developments of 10 dwellings or more (or 0.3ha in area);
 - A benchmark of 30% affordable housing delivery to be sought on sites (subject to viability)
 - An authority-wide target of at least 150 affordable dwellings per annum (although it is not specified as to whether this is a net or gross figure);
 - A tenure split of 82% social rented, and 18% intermediate housing (although paragraph 3.220 of the supporting text advises that the split will be revised through the subsequent Affordable Housing SPD);

- The size and type of affordable housing to be negotiated having regard to evidence of need including the Strategic Housing Market Assessment, housing register data and local housing needs surveys;
 - Use of a local lettings approach to priorities affordable housing lettings to local people; and
- 5.10 It should be noted that Policy CS16 pre-dates the National Planning Policy Framework 2021 and does not reflect the most up-to-date definitions of affordable housing.
- 5.11 Paragraph 3.221 of the supporting text notes that in North Somerset affordable housing will be primarily delivered as a proportion of development on open market schemes. It states that “*The main opportunity to deliver affordable housing numbers is through open market schemes delivering a proportion of affordable housing*”.
- 5.12 Policy CS17 ‘Rural Exceptions Schemes’ provides for the delivery of affordable housing on ‘exception’ sites which would not ordinarily be considered for development, subject to certain criteria.

‘Backwell Future’ Backwell Neighbourhood Plan (CD-G4)

- 5.13 The Backwell Neighbourhood Plan was made in March 2015 and sets out a range of policies for the Backwell area. Chapter 8 discusses new development and identifies the delivery of affordable housing as an important element of this.
- 5.14 Paragraph 8.1 at page 12 of the Neighbourhood Plan states “*Backwell’s need is for more smaller dwellings comprising [...] affordable (social) housing for rent or shared ownership*”. Paragraph 8.2 notes that in Backwell there is an existing affordable housing stock of 94 dwellings plus 23 sheltered accommodation units.
- 5.15 Paragraph 8.3 explains that the Neighbourhood Plan seeks to meet local needs for affordable housing. It states that: “*BACKWELL FUTURE is based on a target of 15 to 20 additional [affordable] dwellings. This is double that implied by the Core Strategy and in excess of Backwell’s current need as indicated by the HomeChoice register maintained by North Somerset Council*”. I discuss the latest affordable housing data at section 7 of this Proof of Evidence which indicates a substantially higher rate of local preference for affordable housing in Backwell, based on the Freedom of Information request (**Appendix JS1**). Paragraph 8.5 goes on to indicate that the Plan “*makes adequate provision for [affordable housing] within the existing Settlement Boundary*” but Planning Policy: Development 3 provides a mechanism for rural

exception sites to come forward in the event that the planned affordable housing is insufficient to meet local needs.

Emerging Local Plan (CD-H1)

- 5.16 North Somerset Council is preparing a new Local Plan. In 2020 and 2021 it undertook a series of Regulation 18 consultations; the ‘Challenges for the Future’ paler in Summer 2020, and the ‘Choices for the Future’ in Autumn 2020.
- 5.17 On 2 February 2022 the Council’s Executive approved the Draft Local Plan for consultation, which is expected to take place later in Spring 2022.
- 5.18 Chapter 2 of the Draft Local Plan sets out the vision, strategic priorities and objectives that the Plan seeks to achieve. Strategic priorities are listed at paragraph 12 at page 8; the priorities include *“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”*. Paragraph 14 at page 9 sets out the Sustainability Appraisal objectives used to assess the Local Plan’s policies; these include objective 2.2 to *“Deliver affordable or specialist housing where it is most needed to meet the needs of North Somerset’s population”*.
- 5.19 Draft policy SP1 ‘Sustainable Development’ at page 11 is an overarching policy which sets out how development should contribute to the environmental, social and economic objectives of sustainable development. The policy includes an array of criteria which include *“Deliver the mix and type of housing to meet local needs including affordable and specialist needs housing”*.
- 5.20 Draft policy SP8 ‘Housing’ is the main emerging policy for affordable housing, which seeks 35% affordable housing provision on qualifying sites (up from 30% in the adopted Core Strategy policy CS16). The policy also sets out an updated expectation in terms of tenure, to include the new First Homes form of discount market sale housing. Policy SP8 states:

“The Council will seek the delivery of a minimum of 35% affordable housing from all sites of 10 or more dwellings, and from sites of 5 or more dwellings within the Area of Outstanding Natural Beauty. The precise size and type of affordable housing to be provided on individual sites will be determined through negotiation, guided by the Local Housing Need Assessment or other evidence and taking account of viability. The expectation is that the first 25%

will be First Homes with the remainder 90% social rented and 10% shared ownership”.

- 5.21 The supporting text at page 21 of the draft Local Plan highlights the importance of affordable housing and the scale of the need in North Somerset. It states that “*Addressing affordable housing needs is an important component of sustainable development. Within North Somerset the Local Housing Needs Assessment identified total affordable housing need 2023-2038 as 4,802 households*”. I discuss the assessment of affordable housing need in more detail at Section 6 of this Proof of Evidence.
- 5.22 Draft Policy DP42 ‘Affordable Housing (including rural exception schemes) at page 136 of the Plan is a specific policy for affordable housing which largely replicates the requirements of draft policy SP8. However, it sets a policy target for the delivery of affordable housing to meet identified needs over the plan period, stating that “*The affordable housing target for North Somerset 2023-2038 will be 4,802 dwellings*”. The table at page 137 shows the components of affordable housing need as set out in the Local Housing Needs Assessment 2021 (**CD-I18**), showing an overall affordable housing need of 4,923 dwellings⁸ as a proportion of 24% of the total Local Housing Need figure.
- 5.23 I note that at the meeting on 2 February 2022 the Executive approved the Local Plan for consultation but subject to an amendment to increase the affordable housing policy requirement from 35% as set out in the draft document, to 40% affordable housing provision. As yet, I am not aware of any viability evidence provided by the Council that supports this apparent ad hoc increase.

Other material considerations

Affordable Housing Supplementary Planning Document (CD-I11)

- 5.24 The Affordable Housing Supplementary Planning Document (SPD) was adopted in November 2013. It provides guidance on the application of adopted Core Strategy policies CS16 and CS17.
- 5.25 Section 4 ‘Housing Need and Supply’ provides an overview of the evidence base for affordable housing need. It notes that the Strategic Housing Market Assessment 2009 was the relevant evidence of affordable housing need at that time but that it

⁸ I note this figure is similar but not consistent with the identified need figure of 4,802 affordable dwellings 2023 to 2038 as set out in the LHNA 2021.

was due to be updated in 2014⁹. Full details of the successive assessments of housing need are set out at section 6 of this Proof of Evidence. The section also notes that a SHMA Addendum ‘Need for Affordable Rent Housing’ was prepared in 2013 to consider the level of need for the then-new tenure of affordable rent as defined in the NPPF. It concluded that the tenure split of 82% social rented, and 18% intermediate housing remained appropriate.

North Somerset Corporate Plan 2020-2024 (CD-I12)

- 5.26 The Corporate Plan sets out North Somerset Council’s corporate priorities across its departments and activity. The ‘About the Plan’ section at page 5 explains that the Corporate Plan *“is the only plan which covers the full range of the council’s responsibilities and is an important tool to help focus our effort and resources on the right things.”*
- 5.27 The section titled Baseline, Opportunities and Challenges presents a summary of the existing situation in North Somerset. At page 8, housing is identified as a challenge:

“Housing – there is a need for significantly more homes to meet the demand of our growing population and government targets, including affordable homes with the average house costing nine times average earnings. We also need to ensure we have sufficient employment land”.

Housing Strategy 2016-2021 (CD-I13)

- 5.28 The Housing Strategy sets out how the Council *“will strive to meet the housing needs of communities in North Somerset over the next five years”* through the delivery of key aims and ambitions. From the outset, the document emphasises that the Council’s Strategy is about meeting housing needs and housing affordability issues.
- 5.29 In setting out the local context and challenges, the Strategy referred to the findings of the June 2015 Strategic Housing Market Assessment (“SHMA”) for the Wider Bristol Housing Market Area (comprising the local planning authorities of Bristol City, South Gloucestershire and North Somerset) there was a need for 29,000 affordable homes across the Housing Market Area up to the year 2036. It is important to note that the 2015 SHMA has since been withdrawn.
- 5.30 The Strategy recorded that in the 12 months between September 2014 and September 2015, the number of applicants joining the HomeChoice register with at

⁹ Full details of the successive assessments of housing need are set out at section 6 of this Proof of Evidence

least one priority housing need was 928 (or an average of 18 per week), compared to an average lettings of 444 per year.

- 5.31 One of the three strategic aims of the Housing Strategy is to increase the supply of new homes. This aim sets several ambitions in which the Council seeks to fulfil which includes “*accelerating the delivery of homes in sustainable locations*”.

Draft Housing Strategy 2022-2027 (CD-I14)

- 5.32 The draft Housing Strategy 2022-2027 is a strategic document “*that pulls together all aspects of the council’s strategic housing function.*” The document is intended to replace the Housing Strategy 2016-2021 and was subject to public consultation between September and November 2021.

- 5.33 Pages 3 and 4 provides some basic facts and figures in relation to housing issues within North Somerset¹⁰. Such facts include:

- The median house price in 2020 was £266,000. This represents 9.47 times the median earnings for a full- time worker in North Somerset, Property ownership is less affordable now than in 2011, when the ratio was 7.1 times median earnings.
- There are 2,700 waiting on the HomeChoice register, with approximately 140 new applications every month. Around 600 HomeChoice properties become available each year

- 5.34 Page 5 presents the vision and aims of the strategy. The vision seeks “*the delivery of a broad range of homes to meet our growing need, with an emphasis on quality and affordability*”. The aims of the new strategy include to increase the supply of homes in particular “*increasing supply including sufficient affordable schemes to meet housing need*” and “*improving and making best use of existing homes*”.

- 5.35 Pages 5-8 sets out the challenges and actions required to address each of the aims that the strategy puts forward. For the aim of ‘*Increasing the supply of homes*’ ten challenges are identified (at pages 5 and 6). These challenges include:

- Lack of supply of affordable homes in all sectors;
- Urgent need for one and two bed homes as there are more single occupancy households due to and increase in older residents and young people needing housing;

¹⁰ I consider housing affordability in more detail at Section 7 of this Proof of Evidence.

- Particular lack of supply in social rented affordable homes of the right size, location and for specific clients (for example, those with complex needs);
- Attracting sufficient funding and inward investment; and
- Identifying suitable sites. This includes brownfield sites which can be expensive to develop due to abnormal costs.

5.36 In order to address the ten challenges, nine actions have been identified (at page 6). These include supporting developers “*by ensuring that our planning processes are clear and giving guidance and advice where needed*” and working “*with local, regional and national partners and maximise funding opportunities to deliver a broad range of new homes that meet the needs of individual locations, with an emphasis on sustainability, Public Health impacts and affordability*”.

5.37 The third aim, “*Providing housing options, prevention and support*” discusses the wider affordability context and seven challenges are presented in respect of this. These include:

- Increasing rents in the private rented sector and the insecurity of private tenancies
- Continued impacts from welfare reforms, including Local Housing Allowance rates, the benefit cap and the removal of the spare room subsidy (sometimes termed the “bedroom tax”)
- Lack of suitable accommodation to meet specific needs and support requirements, especially for people who are leaving hospital or residential care
- Emergency accommodation does not always meet the needs of the people who require it

5.38 Page 8 explains eight actions required to address the identified challenges. These action points include “*tenancy support to those in need to sustain tenancies and assist with access to welfare services*”. A number of action points also provide a renewed commitment to a series of existing initiatives and strategies such as the Home Choice allocation policy and the Housing with Support Strategy 2017-2027.

North Somerset Preventing Homelessness Strategy 2017-2022 (CD-I15)

5.39 The North Somerset ‘Preventing Homelessness Strategy’ sets out the Council’s strategic direction, priorities and actions in respect of homelessness in North

Somerset over a five year period. Section 1 of the strategy on pages 4 and 5 highlight three key themes and subsequent actions, identified themes include:

“Supply – work with partners to improve existing and develop/innovate new accommodation solutions to meet the need of homeless people.

Support – provide a range of support services that sustain independent living and reduce or avoid the risk of households becoming homeless.

Prevention – act to prevent homelessness and help sustain independent living by enabling household to remain in their current home or achieve a planned move to new housing”.

- 5.40 Section 5 of the strategy presents the findings of the Homeless Review 2016/17 including key statistics. The explanatory text to Figure 1 at page 13 discusses the number of homelessness applications the Council has received, stating that *“homelessness applications have been in the range of 264 to 268 for four of the last five years, an average of five applications per week. It seems very unlikely applications will reduce for the foreseeable future to below 200 as they were in 2010/11”*. Whilst an increase in homelessness acceptances is also demonstrated; *“Acceptances have moved above 100 per year in the last two years having been in the range 79-99 for the four previous years”*.
- 5.41 Pages 14 to 15 explain reasons why households have become homeless. The Strategy notes that if the private rented sector (“PRS”) was as ‘secure’ as the social housing sector it would *“go towards preventing a third of all homelessness cases”*. Continuing, page 18 demonstrates the ‘Top 5 prevention methods 2016/16’, the biggest prevention method identified is a ‘social housing offer’.
- 5.42 Following this topic, page 19 expresses that the most frequently used preventative measure in 2010/11 was private sector accommodation. This is expressed as a *“major concern”* accounting for 48% of all cases. By 2015/16 the use of private rented accommodation accounted for 19% of all prevention cases, *“this highlights how hard it is becoming for potentially homeless and homeless people on a low income to access affordable, PRS lets”*.
- 5.43 Page 19 goes on to explain the issues with finding accommodation. It notes the *“shrinking”* ability to locate *“affordable PRS accommodation.”* The reason for this is described as *“the lack of PRS accommodation at rents below the [Housing Benefit] Local Housing Allowance”* along with *“landlords who will not let to those dependent or partly dependent on [Housing Benefit]”*.

5.44 Page 19 further explains that there is increasing pressure on the social rented sector in preventing homelessness, stating that “*year on year, a higher percentage of social housing lettings are being made to prevention case households, from 18% in 2010/11 to 31% in 2015/16*”. Page 19 of the Strategy goes on to state:

“If the use of social housing continues to grow as a main response to preventing homelessness, then this will significantly affect the chances of those with a similarly pressing housing need (e.g. those with greater or equally poor housing conditions, those with a greater or equal level of vulnerability) on the HomeChoice (housing) register of getting access to social housing”.

Sustainable Community Strategy 2008-2026 (CD-I16)

5.45 This Strategy provides a vision whereby, as set out in the Foreword, the Council hopes to create “*better opportunities and a quality of life for all*”.

5.46 With regard to housing, the Strategy recognises at page 14 that one of the main challenges is the “*growing number of people seeking social housing in the area*”. The Strategy adds that the “*availability of housing association property is limited*”. The Council adds at page 15 that it “*must look at ways to narrow the gap between wages and housing costs, and provide affordable housing to tackle the growing demand across the area*”.

5.47 The Strategy establishes a series of ‘shared priorities’ which include “*developing strong inclusive communities*” set out at page 22, and “*improving health and wellbeing*” at page 37. Increasing the provision of accessible and affordable housing was a continual theme within both of these priorities.

5.48 Within the Council’s aim at page 43 to “*Increase the supply and access to affordable housing*”, the Council wishes to see improvements in:

- “*maximised investment to improve supply;*
- *innovation and delivery of affordable homes without the need for public subsidy;*
- *working with housing associations, private sector developers, businesses and landowners for more opportunities for affordable housing; and*
- *new housing developments to provide more affordable housing in development plans”*

Conclusions on the Development Plan and Related Policies

- 5.49 The evidence set out in this section clearly highlights that within adopted and emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority for North Somerset Council. The Council has produced an array of guidance and policy documents, all of which seek to address issues relating to housing and affordable housing in the authority area.

Affordable Housing Needs and Delivery

Section 6

Affordable Housing Need in North Somerset

- 6.1 Whilst the adopted Core Strategy Policy CS16 'Affordable Housing' sets a policy target of 150 affordable dwellings per annum in North Somerset over the Core Strategy period., it is also relevant to consider the assessment of affordable housing need in North Somerset. A number of assessments have been undertaken in recent years including the Strategic Housing Market Assessment in 2009, and the Local Housing Needs Assessment in 2021¹¹.
- 6.2 In the context of identified affordable housing need, it is important to note that the Policy CS16 target of 150 affordable dwellings per annum does not reflect the level of need itself.

Strategic Housing Market Assessment 2009 (CD-I17)

- 6.3 The Strategic Housing Market Assessment ("SHMA") 2009 formed part of the evidence base for the Core Strategy. It sets out an assessment of affordable housing need for North Somerset between 2009 and 2021.
- 6.4 Section 4 of the SHMA 2009 sets out the calculation of affordable housing need:
- Figure 8 at page 28 shows an existing backlog need of 3,286 households in need of social rented housing and 333 households in need of intermediate housing;
 - Figure 9 at page 29 shows an annual average of 555 newly forming households in need of social rented housing and a further 162 newly forming households in need of intermediate housing;
 - Figure 11 at page 30 shows an annual average of 456 projected relets of social rented housing, and a further 11 relets of intermediate housing, each year between 2009 and 2021;

¹¹ In addition, a Strategic Housing Market Assessment ("SHMA") was prepared in 2015 in support of the now-withdrawn Joint Strategic Plan. The SHMA 2015 is referred to in some contemporary documents (for example, the 2016 Housing Strategy). However, the Joint Strategic Plan and its supporting evidence have effectively been deleted from the public record, and copies of the SHMA 2015 are no longer easily accessible in the public domain. As such, I do not consider the SHMA 2015 any further in this report.

- Figure 12 at page 31 shows a committed supply of 254 social rented dwellings and 149 intermediate dwellings;
- Figure 18 at page 35 sets out the overall need for social rented housing for the period 2009-2021, drawing together the evidence set out in the previous tables. For social rented housing the net annual need is 735 affordable dwellings per annum 2009-2021.
- Figure 19 at page 35 sets out the overall need for intermediate housing for the period 2009-2021 in a similar fashion. For intermediate housing the net annual need is 169 intermediate dwellings per annum 2009-2021.
- Figure 20 at page 36 sets out the overall affordable housing need in North Somerset of **904 affordable dwellings per annum between 2009 and 2021**, at a ratio of 81% housing for social rent, and 19% intermediate housing.

West of England Local Housing Needs Assessment 2021 (CD-I18)

- 6.5 The West of England Local Housing Needs Assessment (“LHNA”) 2021 has been commissioned jointly by North Somerset Council and the West of England Combined Authority and forms part of the evidence base for the emerging North Somerset Local Plan. The LHNA covers the fifteen-year period 2023 to 2038.
- 6.6 Figure 90 at page 117 shows that in North Somerset, 1,151 households are anticipated to be in affordable housing need. A further 2,203 households are projected to seek affordable housing over the fifteen year period. This gives a total of 3,354 households seeking affordable housing for rent between 2023 and 2038 (224 dwellings per annum).
- 6.7 The LHNA sets out a separate calculation of need for households aspiring to homeownership. Figure 90 at page 117 shows that in North Somerset, 6,860 households are anticipated to aspire to homeownership. A further 4,310 households are projected to seek homeownership over the fifteen year period. This gives a total of 11,170 households seeking affordable home ownership between 2023 and 2038. However, of these, 1,448 households require assistance to access affordable home ownership. This gives a total of 1,448 households seeking affordable home ownership between 2023 and 2038 (97 dwellings per annum).
- 6.8 Paragraph 5.67 at page 117 of the LHNA combines the need figures for affordable housing and affordable home ownership. It sets out the overall gross affordable

housing need in North Somerset of 968 affordable dwellings per annum between 2023 and 2038.

- 6.9 Paragraph 5.68 notes that the gross affordable housing need exceeds the projected household growth (for all tenures) of 877 households per annum. It explains that a large proportion of the affordable housing need is associated with the whole population, rather than just projected new household growth, and cites the Planning Practice Guidance in support of this approach.
- 6.10 However, subsequent sections net off a significant proportion of households who are in housing need but are otherwise able to afford housing. This is summarised at figure 92 and paragraph 5.77 at page 121 of the LHNA. **This leaves a net housing need in North Somerset of 320 affordable dwellings per annum between 2023 and 2038.** Overall, the affordable housing need stands at 4,802 households over the fifteen-year period between 2023 and 2038.
- 6.11 It should be noted that the LHNA 2021 adopts a substantially different methodology when compared with the SHMA 2009. Key differences include;
- The LHNA 2021 uses different data sources to identify backlog needs, and divides the backlog need over a fifteen year period rather than the ten years allowed for in the SHMA 2009;
 - The LHNA 2021 assumes that households in the private rented sector (“PRS”), who can afford their housing because they receive housing benefit, are not in affordable housing need.

Consideration of Affordable Housing Need by Appeal Inspectors

- 6.12 The status of both the identified affordable housing need of 904 dwellings per annum, and the Core Strategy Policy CP16 target of 150 dwellings per annum, were considered in detail at an appeal at Scot Elm Drive, Weston-super-Mare, in 2015 (**CD-J29**).
- 6.13 In respect of the objectively assessed need figure of 904 dwellings per annum, the Inspector raised a number of concerns at paragraph 48 at page 9 of the decision letter. These include the dated nature of the calculation (which was already six years old at the time of the appeal); and the fact it does not account for the contribution of the Private Rented Sector in meeting housing need. At paragraph 49 at page 10, the Inspector noted the Council’s position that “*the SHMA indicates a substantial level of housing need for North Somerset over the plan period which is*

considerably in excess of what could realistically be delivered” but also recognised the Council’s position that *“the practical implication of this is that affordable housing opportunities should be maximised”*.

- 6.14 The Inspector went on to consider the provenance of the 150 dwelling per annum target set out in adopted policy CS16. At paragraph 48 at page 9 of the decision letter, the Inspector stated: *“it is not clear from the evidence how this figure was derived and, like the appellant, the Council has not submitted an updated [affordable housing objectively assessed need figure] as part of its Evidence”*. At paragraph 49 at page 10, the Inspector noted that the Council’s stated position *“serve[s] to underline that the target of 150 affordable homes per year is a minimum target”* and at paragraph 50 the Inspector commented that in the context of other uncontested evidence including housing register data, that *“it is also reasonable to conclude that the current [affordable housing objectively assessed need figure] is likely to be greater than 150 dwelling per year”*.
- 6.15 Taking the above factors into account, the Inspector considered that the proposed affordable housing provision would contribute to meeting the identified affordable housing need; paragraph 55 at page 10 of the decision letter confirming that the provision of market and affordable housing carried *“substantial”* weight in favour of the scheme.
- 6.16 In my opinion, the Scot Elm Drive decision provides important context for the identified affordable housing need figure. I recognise the SHMA 2009 identified need of 904 affordable dwellings per annum is somewhat out-of-date, albeit it still provides the only objective assessment of affordable housing need in North Somerset that has been tested at Examination. The decision also clearly indicates that the CS16 policy target of 150 affordable dwellings per annum bears little resemblance to the identified affordable housing needs in North Somerset.

Local Housing Need vs Affordable Housing Need

- 6.17 From September 2020 the Council’s housing supply has been measured against a figure based on the Government’s standard methodology for assessing Local Housing Need. This results in an assessment of Local Housing Need of 1,389 dwellings per year in the North Somerset area at the time of writing¹².
- 6.18 Whilst the Standard Method for calculating Local Housing Need applies an affordability adjustment, the PPG is clear that:

¹² As set out in the housing land supply evidence of Mr Paterson-Neild.

“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 guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes¹³.” (my emphasis)

- 6.19 Evidently providing an affordability adjustment to start to address the affordability of homes in an authority is clearly not the same as calculating an affordable housing need figure. The affordability uplift is simply a function of the standard methodology, and it is not a basis for determining the numerical need for affordable housing nor the types of affordable housing required as defined in Annex 2 of the NPPF (2021).
- 6.20 This is further supported by the fact that calculating such need for an authority is dealt with under a separate section of the PPG titled ‘*How is the total annual need for affordable housing calculated?*’ which clearly sets out that:

“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period¹⁴.”

- 6.21 As such whilst the Standard Method calculation may be appropriate for monitoring general housing needs and supply across the authority it does not provide an objectively assessed need figure for affordable housing in line with the PPG. As such it does not reflect affordable housing need; nor is it an appropriate basis with which to monitor affordable housing supply.

Affordable Housing Delivery in North Somerset

- 6.22 Figure 6.1 illustrates the delivery of affordable housing in North Somerset since the start of the SHMA 2009 period in 2009/10 (the SHMA 2009 being the document that formed the evidence for the Core Strategy).

¹³ Paragraph: 006 Reference ID: 2a-006-20190220

¹⁴ Paragraph: 024 Reference ID: 2a-024-20190220

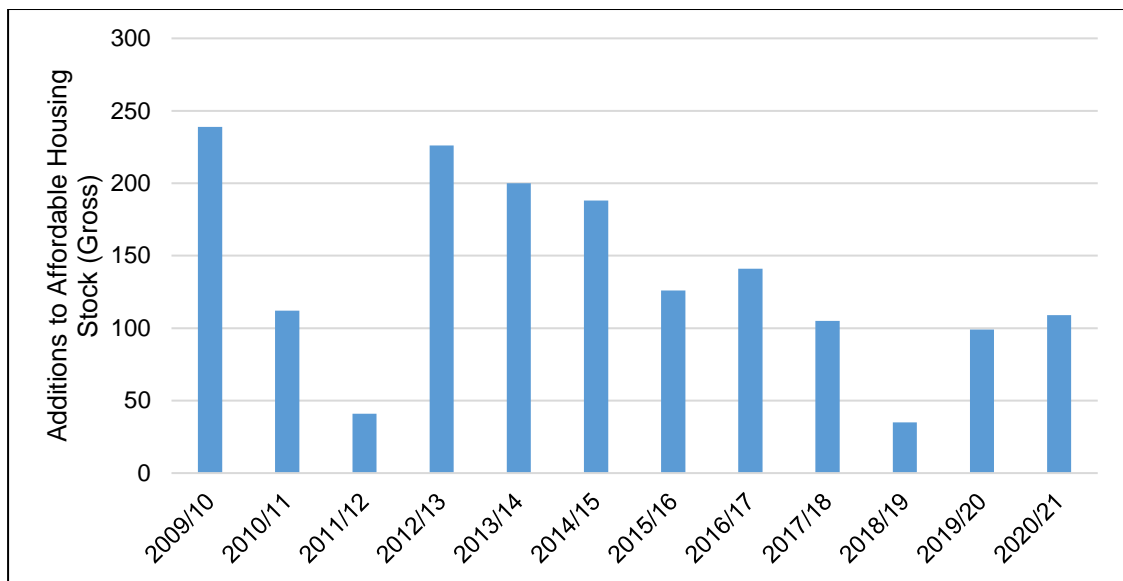
Figure 6.1: Gross Additions to Affordable Housing Stock 2009/10 to 2020/21

Monitoring Year	Total housing completions (Net)	Additions to Affordable Housing Stock (Gross)	Gross affordable additions as a %age of total completions
2009/10	521	239	46%
2010/11	386	112	29%
2011/12	515	41	8%
2012/13	527	226	43%
2013/14	762	200	26%
2014/15	674	188	28%
2015/16	569	126	22%
2016/17	852	141	17%
2017/18	863	105	12%
2018/19	729	35	5%
2019/20	868	99	11%
2020/21	966	109	11%
Total	8,232	1,621	20%
Annual Average	686	135	20%

Source: DLUHC Live Tables 122 and 1008c

- 6.23 Figure 6.1 demonstrates that on average during the twelve-year period between 2009/10 and 2020/21, North Somerset has added an average of 135 gross affordable dwellings per annum, equivalent to 20% of net housing completions.
- 6.24 The delivery of affordable housing is illustrated in the chart at Figure 6.2 below. This shows a steady decline in affordable housing delivery over this period, with rates of delivery in the latter years of the period generally being lower than the earlier six years. Gross delivery has not exceeded 150 dwellings per annum since 2014/15.

Figure 6.2: Gross Additions to Affordable Housing Stock 2009/10 to 2020/21



Source: DLUHC Live Tables 122 and 1008c

- 6.25 It is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through the Right to Buy. As set out below, once such losses are taken in to account the Council's gross completions figures falls by 11% to 1,439 net affordable dwellings over the twelve-year period.

Accounting for the Right to Buy

- 6.26 At a national level almost two million households have exercised their Right to Buy since it was introduced in 1980. In July 2015, the Conservative Government published 'Fixing the Foundations: Creating a More Prosperous Nation' which confirms that the Government is committed to extending the Right to Buy to housing association tenants, noting that "*since the Right to Buy for council tenants was reinvigorated in the last Parliament, the number of sales has increased by nearly 320%*".
- 6.27 In my opinion the extension of Right to Buy to Housing Association tenants will further increase the loss of existing affordable housing stock, putting increasing pressure on the need to deliver more affordable homes in North Somerset in the future.
- 6.28 The Government's Housing White Paper (February 2017) sets out at paragraph 4.22 that the reinvigoration of the Right to Buy scheme in 2012 which increased discounts significantly, has resulted in over 60,000 affordable homes being sold.

This is equivalent to an average of 12,000 affordable homes lost per year, every year, on a national basis for the five-year period between 2012 and 2017.

- 6.29 North Somerset Council has confirmed in its Freedom of Information response of 13 January 2022 (**Appendix JS1**) that all their affordable housing stock was transferred to a Registered Provider, Alliance Homes in 2006.
- 6.30 Data on Registered Provider sales of affordable housing to Registered Provider tenants is contained in the annual Statistical Data Returns (“SDR”) data sets for the period 2011/12 to 2020/21 published by the Regulator of Social Housing. Figure 6.3 below sets out the recorded Right to Buy sales in North Somerset for this period.
- 6.31 Figure 6.3 below demonstrates that a total of 182 Right to Buy sales were recorded, an average of 18 dwellings per annum over the ten-year period between 2011/12 and 2020/21.

Figure 6.3: Registered Provider Right to Buy Sales in North Somerset, 2011/12 to 2020/21

Monitoring Year	Registered Provider Right to Buy Sales
2011/12	4
2012/13	15
2013/14	29
2014/15	24
2015/16	29
2016/17	23
2017/18	18
2018/19	15
2019/20	21
2020/21	4
Total	182
Annual Average	18

Source: Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2012 to 2021)

- 6.32 Figure 6.4 below calculates the net affordable housing delivery per annum during the twelve-year period since the start of the SHMA 2009 period in 2009/10. The loss of 182 affordable dwellings equates to 11% of the gross affordable housing completions of 1,621 affordable dwellings over this twelve-year period.

Figure 6.4: Net Additions to Affordable Housing Stock 2009/10 to 2020/21

Monitoring Year	Total housing completions (Net)	Additions to Affordable Housing Stock (Gross)	Registered Provider Right to Buy Sales	Additions to Affordable Housing Stock (Net)	Net affordable additions as a %age of total completions
2009/10	521	239	<i>Not available</i>	239	46%
2010/11	386	112	<i>Not available</i>	112	29%
2011/12	515	41	4	37	7%
2012/13	527	226	15	211	40%
2013/14	762	200	29	171	22%
2014/15	674	188	24	164	24%
2015/16	569	126	29	97	17%
2016/17	852	141	23	118	14%
2017/18	863	105	18	87	10%
2018/19	729	35	15	20	3%
2019/20	868	99	21	78	9%
2020/21	966	109	4	105	11%
Total	8,232	1,621	182	1,439	17%

Source: DLUHC Live Tables 122 and 1008c; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2012 to 2021)

Affordable Housing Delivery Compared to Affordable Housing Target and Needs

- 6.33 As set out above, the Core Strategy CS16 target of 150 affordable dwellings per annum is substantially lower than either the prevailing objectively assessed need in the SHMA 2009 of 904 affordable dwellings per annum, and the need figure in the more recent LHNA 2021 of 320 affordable dwellings per annum. The CS16 target bears no resemblance to identified affordable housing need and in my view is of limited utility in the context of the Scot Elm Drive decision. Nonetheless, I set out below a comparison of net affordable housing delivery against the CS16 target.
- 6.34 When comparison is drawn between affordable housing delivery and Policy CS16 target, a shortfall of 299 affordable dwellings has arisen, against a cumulative target of 1,350 affordable dwellings over the nine years between the adoption of the Core Strategy in 2012/13, and 2020/21.

Figure 6.5: Net Additions to Affordable Housing Stock Compared with CS16 Policy Target, 2012/13 to 2020/21

Monitoring Year	CS16 Policy Target (150dpa)	Additions to Affordable Housing Stock (Net)	Surplus/Shortfall
2012/13	150	211	61
2013/14	150	171	21
2014/15	150	164	14
2015/16	150	97	-53
2016/17	150	118	-32
2017/18	150	87	-63
2018/19	150	20	-130
2019/20	150	78	-72
2020/21	150	105	-45
Total	1,350	1,051	-299

Source: DLUHC Live Tables 122 and 1008c; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2012 to 2021); Core Strategy 2012

- 6.35 When comparison is drawn between affordable housing delivery and the objectively assessed affordable housing need of 904 affordable dwellings per annum as set out in the SHMA 2009, a shortfall of 9,409 affordable dwellings has arisen, against a cumulative need of 10,848 affordable dwellings over the twelve years between 2009/10 and 2020/21. The SHMA 2009 remains the only assessment of affordable housing need in North Somerset that has been tested at Examination and forms part of the evidence base that underpins the adopted Core Strategy.

Figure 6.6: Net Additions to Affordable Housing Stock Compared with Identified Affordable Housing Needs SHMA 2009, 2009/10 to 2020/21

Monitoring Year	SHMA 2009 Affordable Housing Need (904dpa)	Additions to Affordable Housing Stock (Net)	Surplus/Shortfall
2009/10	904	239	-665
2010/11	904	112	-792
2011/12	904	37	-867
2012/13	904	211	-693
2013/14	904	171	-733
2014/15	904	164	-740
2015/16	904	97	-807
2016/17	904	118	-786
2017/18	904	87	-817
2018/19	904	20	-884
2019/20	904	78	-826
2020/21	904	105	-799
Total	10,848	1,439	-9,409

Source: DLUHC Live Tables 122 and 1008c; Private Registered Provider Social Housing Stock in England: Statistical Data Returns (2012 to 2021); SHMA 2009

- 6.36 It is too soon to be able to assess performance against the affordable housing need of 320 dwellings per annum identified in the LHNA 2021, since this covers a period from 2023 to 2038 which is yet to commence. However, the average rate of delivery to date stands at 135 affordable dwellings per annum (between 2009/10 and 2020/21) before Right to Buy losses are accounted for; which is less than half the level of need identified in the LHNA.

Future Delivery of Affordable Housing in North Somerset

- 6.37 The future delivery of affordable housing is highly uncertain. It is possible to undertake a more detailed analysis of the projected housing land supply to better understand the prospects for future affordable housing delivery in North Somerset. I set out in **Appendix JS5** an assessment of the likely deliverable supply of affordable housing in North Somerset. I base this assessment on the Appellant's position on housing land supply, set out in the evidence of Mr Paterson-Neild.

6.38 For the purposes of the assessment:

- The estimated affordable housing delivery for each site is based upon the Section 106 agreement or where this is not available, other documentary evidence (for example, officers' reports or approved accommodation schedules);
- The projected affordable housing is pro-rated as a percentage of overall affordable delivery per annum;
- Nil delivery is assumed from small sites and windfall as these typically fall under the application size threshold from which affordable housing is sought;
- Similarly, nil delivery is assumed from pending 'live' planning applications since the precise nature and amount of affordable housing is subject to negotiation and cannot be confirmed at this stage. Moreover, there are no guarantees that planning permission will be granted on these sites.
- I have not counted emerging allocations in the draft Local Plan since the document is at an early stage of production, has not yet been subject to public consultation, and its planned adoption remains several years away in the future.

6.39 The assessment reveals that the Council has a deliverable supply of 867 affordable dwellings over the next five years between 2021/22 and 2025/26. This is an average of 175 affordable dwellings per annum. Whilst this is an improvement when compared against the gross affordable housing delivery of 135 affordable dwellings per annum between 2012/13 and 2020/21; it nonetheless falls significantly short of meeting identified needs. The LHNA 2021 identifies a need of 320 affordable dwellings per annum from 2023/24 onwards; the delivery of 175 affordable dwellings per annum over the next five years represents just 55% of the identified need figure.

6.40 In addition to the on-site delivery of affordable housing, my assessment of future supply also shows that financial contributions totalling £1,267,078 have been secured for off-site provision. In 2018/19 the Government indicated the average cost of providing a new affordable home in the South West was £152,000 (see **Appendix JS6**). The financial contribution is therefore equivalent to delivering eight additional affordable homes.

6.41 It is clear that a 'step change' in affordable housing delivery in North Somerset will be needed to bolster the supply to meet the. It makes it even more important that suitable sites, such as the appeal site, are granted planning permission.

Affordable Housing Delivery in Backwell

- 6.42 The Council's Freedom of Information response (**Appendix JS1**) advises that between adoption of the Core Strategy in 2012 and the most recent monitoring year in 2020/21, the delivery of affordable housing in Backwell Civil Parish has been nil¹⁵. The response also advises that the last affordable dwelling completions in Backwell were nine dwellings in 2002/03, almost 20 years ago.
- 6.43 The Council does not hold data on Right to Buy losses in Backwell Civil Parish prior to 2006 but data from 2000 to 2004 (set out in the Freedom of Information response) indicates annual losses of between 1 and 3 affordable dwellings per annum. In the likely situation that dwelling losses have occurred since 2006 then affordable housing delivery in Backwell CP will be a net negative position between 2006/07 and 2020/21.
- 6.44 I note that since then, 20 affordable dwellings have recently been completed at land at Moor Lane, Backwell, as part of a development of 65 dwellings by Taylor Wimpey. Construction of these was completed in late 2021.
- 6.45 In a context where 744 households on the Housing Register have expressed a preference for accommodation in Backwell electoral ward in 2021¹⁶(as confirmed through the Freedom of Information response) I consider that the delivery of just 20 affordable homes in Backwell since 2012 is an alarming and inadequate situation.

Conclusion on Affordable Housing Needs and Delivery

- 6.46 It is my view that the evidence demonstrates there is an acute need for affordable housing in North Somerset. The delivery record since 2009/10 has fallen far short of meeting identified needs, or even the Council's much lower policy target contained in policy CS16. Since 2009/10 there have been 1,621 net additions to affordable housing stock, or an average of 135 dwellings per annum. This level of delivery has resulted in substantial shortfalls in affordable housing delivery:
- The SHMA 2009 identifies an objectively assessed need for 904 net affordable homes per annum for the period 2009/10 to 2020/21 in North Somerset. The Council has accrued a substantial shortfall of 9,409 affordable dwellings against the cumulative need over this period.

¹⁵ See my paragraph 6.44

¹⁶ I discuss the Housing Register in more detail in more detail in Section 7 of this Proof of Evidence.

- Policy CS16 identifies a target of 150 affordable homes per annum in North Somerset. Since adoption of the Core Strategy in 2012/13, the Council has accrued a shortfall of 299 affordable dwellings against the cumulative target over this period. It should be noted that the CS16 target does not reflect identified need.
- The LHNA 2021 has identified an objectively assessed need for 320 affordable dwellings per annum from 2023/24 to 2037/38. Whilst this period is yet to commence, the prevailing rate of 141 net affordable completions per annum between 2006/07 and 2020/21 shows that a step change in delivery will be required in order to meet the LHNA identified need in the future.

6.47 Looking ahead at the future deliverable supply of affordable housing, the Council is likely to deliver an average of 175 affordable dwellings per annum over the five years between 2021/22 and 2025/26. This is not enough to meet the identified need for 320 affordable dwellings per annum from 2023 onwards. In addition, financial contributions equivalent to delivering eight dwellings have been secured.

6.48 In Backwell itself, there have been just 20 affordable houses delivered since adoption of the Core Strategy in 2012, as a single site in 2021/22. I consider this is inadequate in the context of local needs. Furthermore, there are no other sites, identified in Appendix JS6, delivering any affordable homes in Backwell in the next five years.

6.49 It is clear that the delivery of affordable housing in North Somerset is persistently falling far short of meeting identified need; has done so since at least the adoption of the Core Strategy in 2012/13; and will continue to do so into the future.

Affordability Indicators

Section 7

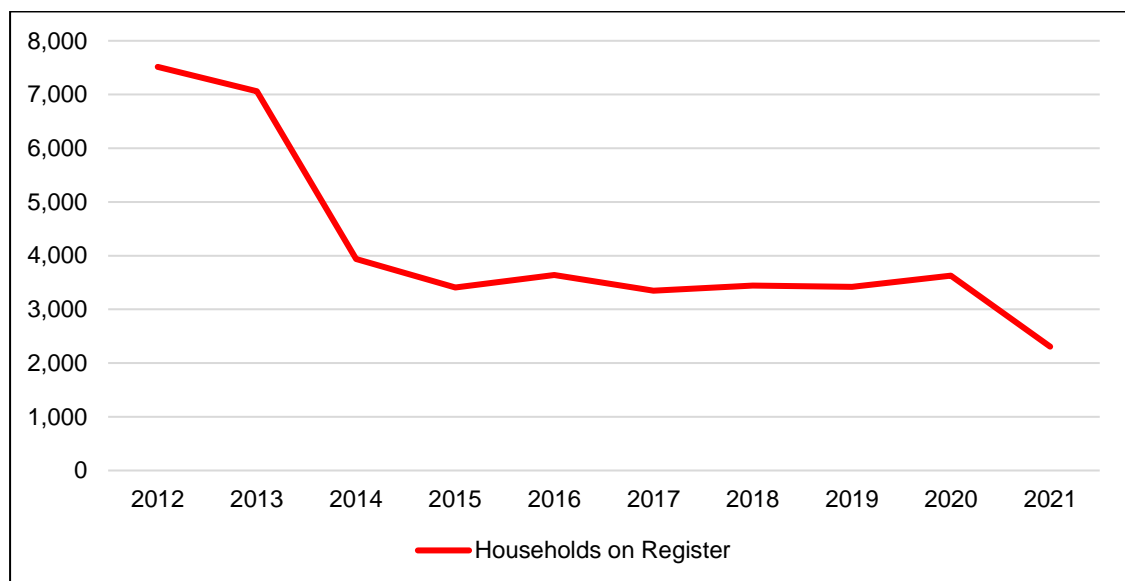
Market Signals

- 7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of plan making.

Housing Register

- 7.2 The number of households on North Somerset Council's housing register stood at 2,306 households on 31 March 2021.

Figure 7.1: North Somerset Housing Register, 2012 to 2021



Source: DLUHC Live Table 600

- 7.3 As a result of changes introduced by the Localism Act 2011, Local Housing Authorities have been able to set their own Housing Register criteria from June 2012. In the case of North Somerset, a new policy came into effect in April 2013¹⁷, coincident with a sharp fall in the housing register between 2013 and 2014.
- 7.4 For many authorities this has meant excluding applicants already on the list who no longer meet their new narrower criteria but who were still in need of affordable

¹⁷ Confirmed through the Council's Freedom of Information response at Appendix JS1.

housing. As mentioned earlier many of these were forced to meet their housing needs by entering the PRS.

- 7.5 On 11 March 2016 *Inside Housing* magazine reported that 159 English Councils have struck 237,793 people off their waiting lists and barred a further 42,994 new applicants since the Localism Act came into effect in June 2012. The Head of Policy at the Chartered Institute of Housing commented that the requirements “*generally aren’t good practice*” as they can be “*discriminatory depending on how long they’re applied*”.
- 7.6 Such an approach does not reduce the need for affordable housing but instead makes it even harder for those unable to access open market housing to find a suitable place to live, with even more at risk of homelessness.
- 7.7 The research suggests a surge in people removed or barred from waiting lists, which is much higher than the 113,000 found by *Inside Housing* in April 2014. The article acknowledges however that there have been 775 occasions since 2012 where a decision to remove an applicant from the waiting list or refuse access has been reversed after it was contested. A copy of the March 2016 article is included as **Appendix JS8**.
- 7.8 This was also recognised in the House of Commons Briefing Paper: Allocating Social Housing (June 2017) which analysed the impact of new allocations policies. It highlighted that “*there has been a reduction in the numbers of applicants registering on local authority housing waiting lists following the introduction of revised housing allocation schemes under the Localism Act 2011*”.
- 7.9 The Briefing Paper found that the reasons for these reductions were that “*...English local authorities had used powers to limit access to social housing by amending their allocation policies...*” and “*...the requirements generally aren’t good practice*” as they can be “*discriminatory depending on how long they’re applied*”.
- 7.10 Indeed, there have been several legal challenges to local authority allocation schemes since the 2011 Act came into force and Councils were “*...reportedly reviewing their allocation policies...*” following a High Court judgment which held that a council’s allocation policy indirectly discriminated against women and disabled and older people.
- 7.11 Such an approach does not reduce the need for affordable housing but instead makes it even harder for those unable to access open market housing to find a suitable place to live, with even more at risk of homelessness.

7.12 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester (**CD-J26**). In assessing the need for affordable housing in the District, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged that:

“The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal” (my emphasis).

7.13 A similar view was expressed in the July 2019 decision by the Inspector presiding over an appeal at Dylon International Premises in the London Borough of Bromley (**CD-J27**), where the Inspector commented, *“Currently, there are some 3,477 households on the Council’s, heavily circumscribed, housing waiting list. For those accepted on the waiting list, there is an average wait time of 1.3-years for a one-bed home, 2.7-years for a 2-bed home and 2.6 -years for a 3-bed home.”*

7.14 The Inspector went on to conclude at paragraph 35 that *“very substantial weight attaches to the contribution of this scheme to the provision of market housing and particularly the pressing need for affordable housing” (my emphasis).*

7.15 Furthermore, in the appeal decision at Oxford Brookes University Campus at Wheatley, (**CD-J28**) Inspector DM Young asserted that in the context of a lengthy housing register of 2,421 households *“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses” (my emphasis).* He went on to state that *“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list”* before concluding that *“Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”.*

- 7.16 In the planning balance the Inspector stated that, *“The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”*.
- 7.17 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery.
- 7.18 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. affordable rented, starter homes, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.
- 7.19 There is no “Housing Register” for households who do not meet the Council’s qualification criteria for social or affordable rented dwellings but still need assistance with their accommodation because they cannot afford a property on the open market. Intermediate housing is an important part of the affordable housing needs of the Borough, however there is no Housing Register for those needing an intermediate or shared ownership dwelling.
- 7.20 In short there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the new NPPF.
- 7.21 The Franklands Drive Secretary of State appeal decision in 2006 (**Appendix JS9**) underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.

7.22 As such the number of households on the Housing register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

Local demand for affordable housing

7.23 There is a high level of demand for affordable housing in Backwell. The Council’s Freedom of Information response (**Appendix JS1**) sets out that of 2,306 households on the Housing Register in April 2021, 744 have expressed a preference for housing in Backwell electoral ward. This is equivalent to 32% of all applicants on the Housing Register.

7.24 This can be compared against the average number of affordable housing lettings in Backwell. The Freedom of Information response shows that there were 4 lettings in 2019/20 and 6 lettings in 2020/21. On this basis, it would take 124 years at the current rate of lettings, to accommodate every household on the Register with a preference for Backwell. Such a scenario is plainly unrealistic but illustrates the scale of the challenge of meeting affordable housing needs in Backwell.

Waiting times for affordable housing

7.25 Figure 7.2 sets out the average waiting time on 1 April 2021 by dwelling size in North Somerset

Figure 7.2: Average Waiting Times for Affordable Housing, North Somerset, 2020/21

Type of Affordable Dwelling	Average Wait Time
1-bedroom / shared accommodation	588 days (approximately 1 year 7 months)
2-bedrooms	694 days (approximately 1 year 11 months)
3-bedrooms	956 days (approximately 2 years 7 months)
4+ bedrooms	928 days (approximately 2 years 6 months)

Source: Freedom of Information Response, 13 January 2022

7.26 The data reveal that applicants on the Housing Register face lengthy waits to be allocated an affordable dwelling. Average waiting times for three- and four-bedroom dwellings are the longest, in excess of two-and-a-half years. During these waiting periods, households may well be experiencing the day-to-day effects of overcrowding, high prices or poor conditions.

7.27 The waiting times for affordable housing were noted by Inspector David MH Rose in considering an appeal at Land north of Oldmixon Road, Weston-super-Mare, in April 2017 (CD-J30) an appeal at which I gave evidence. Paragraph 95 of the decision letter noted that “*The average waiting time for an affordable home in North Somerset is 735 days. The most severe needs experience an average delay of 602 days*”. The most recent data show little change in this position; whilst average waits for 1- and 2-bed dwellings are shorter in 2020/21 than the average for 2016, waiting times for 3- and 4+ bedroom dwellings have lengthened.

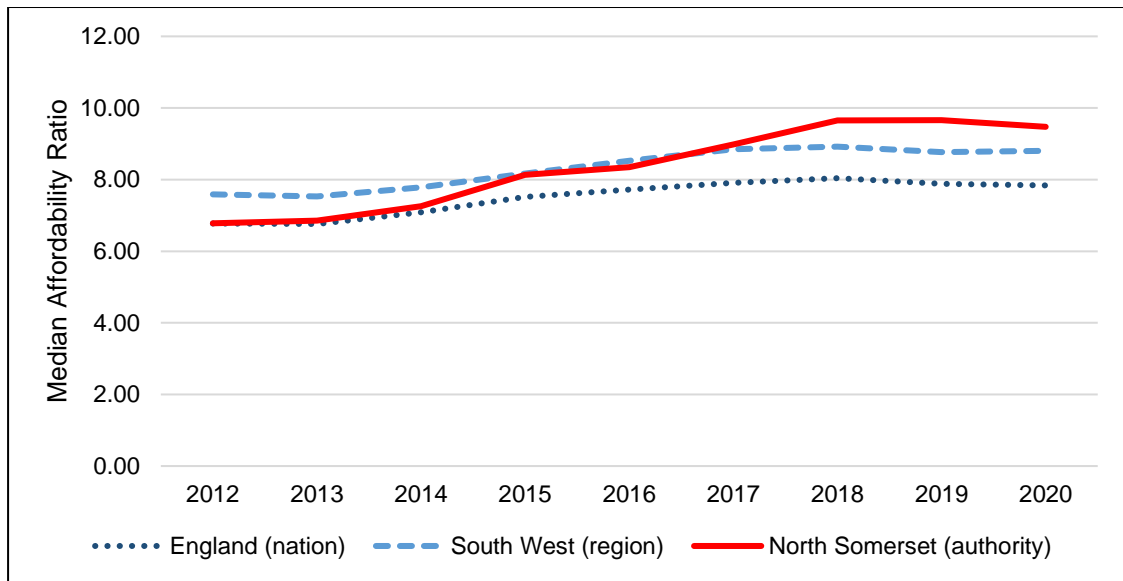
Affordability Ratios

7.28 Affordability ratios are published each year by the Office for National Statistics (“ONS”). These compare average house prices with average workplace-based earnings.

7.29 In North Somerset, the median affordability ratio stood at 9.47 in 2020. This means it costs the average worker in North Somerset 9.47 times their income to purchase a house. This represents a significant barrier to homeownership. This matter is recognised in the Council’s adopted and emerging Development Plan, within which various documents have identified poor affordability as a problem in North Somerset.

7.30 Upon adoption of the Core Strategy in 2012, the median affordability ratio in North Somerset stood at 6.97, meaning that the affordability ratio has worsened by 40% in the eight years between 2012 and 2020. By comparison, the median affordability ratio worsened by 16% in both the South West region and in England as a whole. This indicates that housing affordability is worsening at a faster rate in North Somerset than the region and the nation. As Figure 7.3 below illustrates, the median affordability ratio in North Somerset has overtaken that of the region since the Core Strategy was adopted.

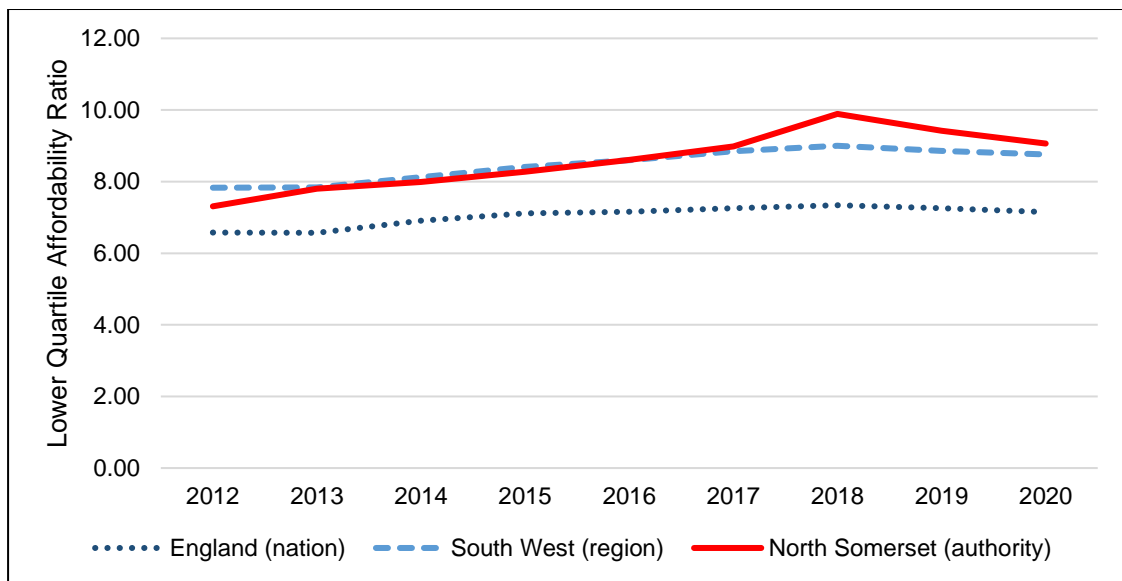
Figure 7.3: Median Affordability Ratio, North Somerset, 2012 to 2020



Source: ONS

- 7.31 The lower quartile affordability ratio, which is more representative of the entry level of the housing market, shows a similar situation. In North Somerset, the lower quartile affordability ratio stood at 9.06 in 2020.
- 7.32 Upon adoption of the Core Strategy in 2012, the lower quartile affordability ratio in North Somerset stood at 7.31, meaning that the affordability ratio has worsened by 24% in the eight years between 2012 and 2020. By comparison, the median affordability ratio worsened by 12% in the South West region and by 9% in England as a whole. This indicates that lower quartile housing affordability is worsening at a faster rate in North Somerset than the region and the nation. As Figure 7.4 below illustrates, as with the median ratio, the lower quartile affordability ratio in North Somerset has overtaken that of the region during the Core Strategy period.

Figure 7.4: Lower Quartile Affordability Ratio, North Somerset, 2012 to 2020

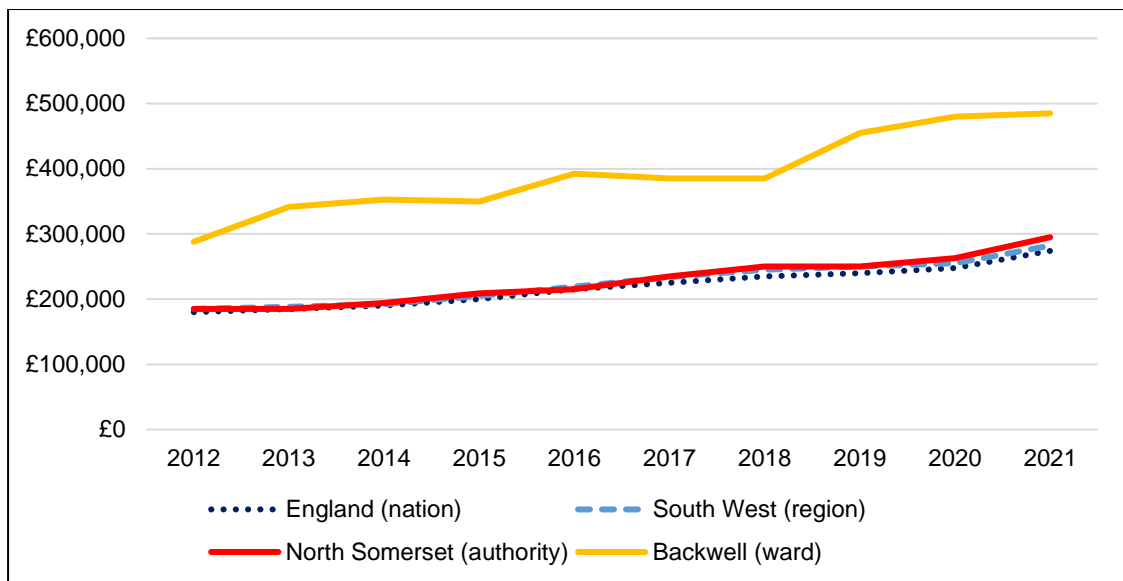


Source: ONS

House Prices in North Somerset

- 7.33 Data from the Valuation Office Agency (“VOA”) shows changes in median and lower quartile house prices observed since the adoption of the Core Strategy in 2012. The data illustrates that prices in North Somerset are currently higher than in the nation and region, and that prices in Backwell are substantially higher still than the authority-wide level.
- 7.34 In 2021, the median house price in North Somerset stood at £295,000, a 59% increase from the figure of £185,000 in 2012 when the Core Strategy was adopted. By comparison, in 2021 the median house price in the South West region stood at £282,000 (a 52% increase since 2012) and in England stood at £274,000 (also a 52% increase since 2012). This shows that median prices have risen faster in North Somerset than in the nation and region.
- 7.35 In 2021, the median house price in Backwell stood at £485,000, a 68% increase from the figure of £288,000 in 2012. The median house price in Backwell is some £190,000 higher than the authority-wide figure for North Somerset, and prices have risen faster than in the authority as a whole over this period.

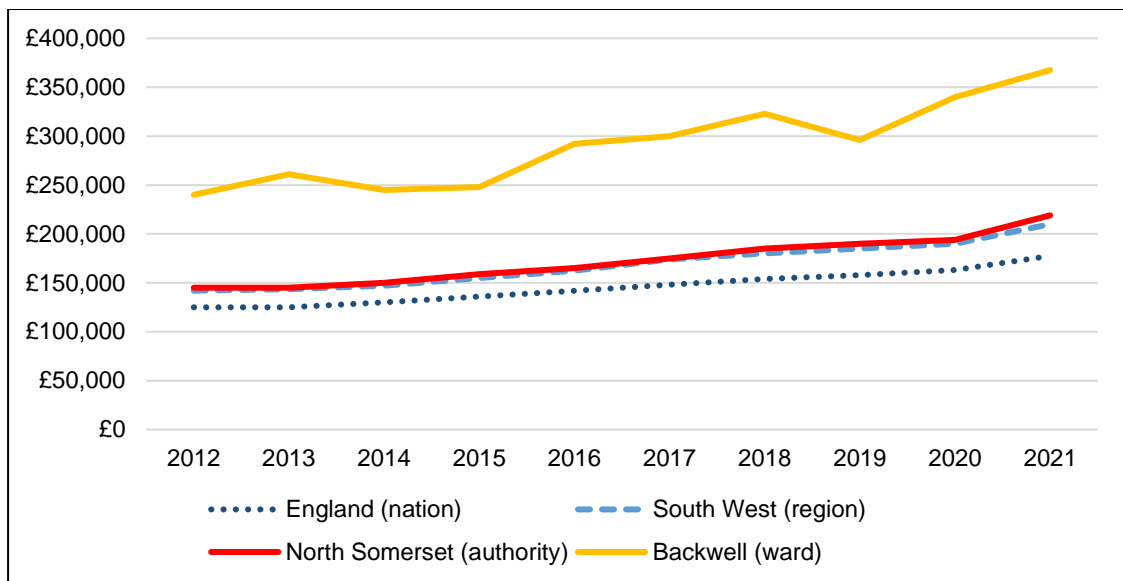
Figure 7.5: Median House Prices, North Somerset and Backwell, 2012 to 2021



Source: VOA

- 7.36 Lower quartile house prices are more representative of the ‘more affordable’ end of the property market. In 2021, the lower quartile house price North Somerset stood at £219,000, a 51% increase from the figure of £145,000 in 2012. By comparison, in 2021 the median house price in the South West region stood at £210,000 (a 48% increase since 2012) and in England stood at £177,500 (a 42% increase since 2012). This shows that lower quartile prices have risen faster in North Somerset than in the nation and region.
- 7.37 In 2021, the lower quartile house price in Backwell stood at £367,500, a 53% increase from the figure of £240,000 in 2012. The lower quartile house price in Backwell is now some £148,500 higher than the authority-wide figure for North Somerset.

Figure 7.6: Lower Quartile House Prices, North Somerset and Backwell, 2012 to 2021

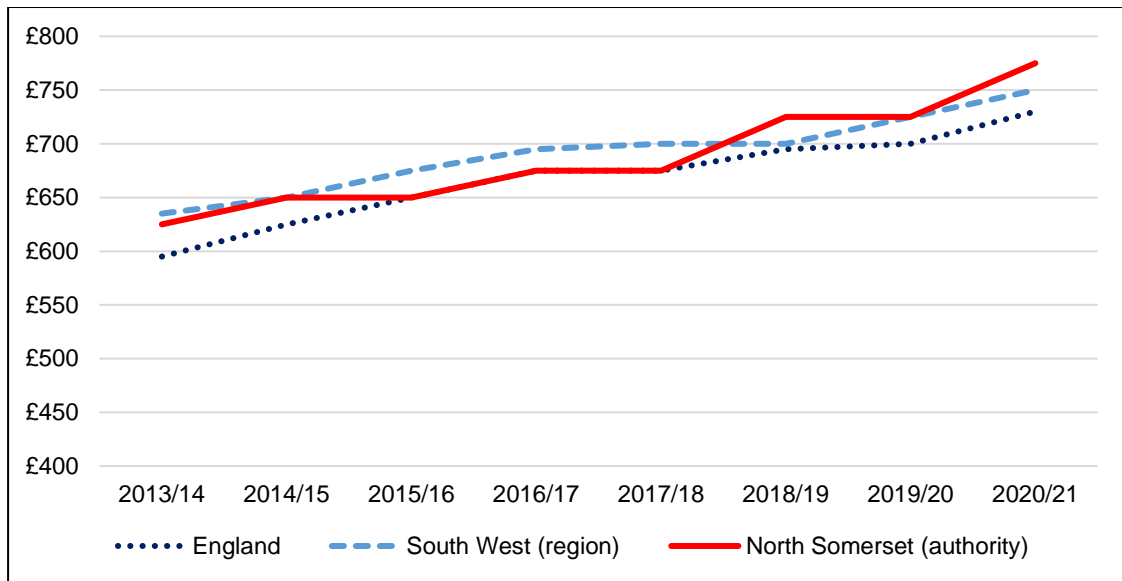


Source: VOA

Private Sector Rents in North Somerset

- 7.38 Data from the VOA and ONS, published since 2013/14, shows changes in median and lower quartile private sector rents. The data illustrates that private sector rents in North Somerset are currently higher than in the nation and region.
- 7.39 In 2020/21, the median private sector rent in North Somerset stood at £775, a 24% increase from the figure of £625 in 2013/14. By comparison, in 2020/21 the median private sector rent in the South West region stood at £750 (an 18% increase since 2013/14) and in England stood at £730 (a 23% increase since 2013/14). This shows that the median private sector rent is currently £25 more than the regional average, and £45 more than the national average.

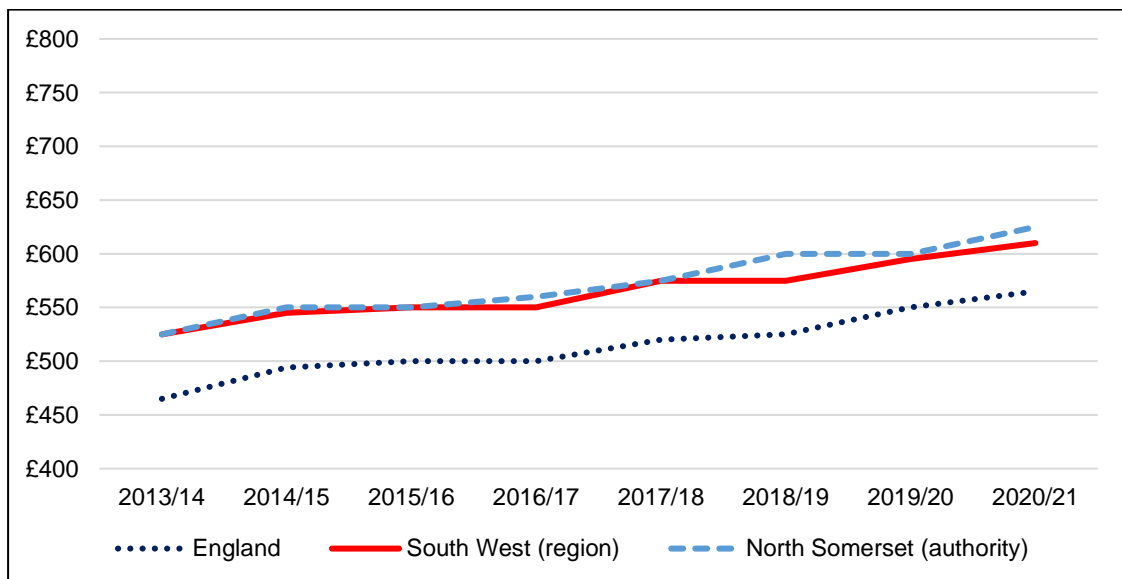
Figure 7.7: Median Private Sector Rents, North Somerset, 2013/14 to 2020/21



Source: VOA

7.40 In 2020/21, the lower quartile private sector rent in North Somerset stood at £625, a 19% increase from the figure of £525 in 2013/14. By comparison, in 2020/21 the lower quartile private sector rent in the South West region stood at £610 (an 16% increase since 2013/14) and in England stood at £565 (a 22% increase since 2013/14). This shows that the lower quartile private sector rent is currently £15 more than the regional average, and £60 more than the national average.

Figure 7.8: Lower Quartile Private Sector Rents, North Somerset, 2013/14 to 2020/21

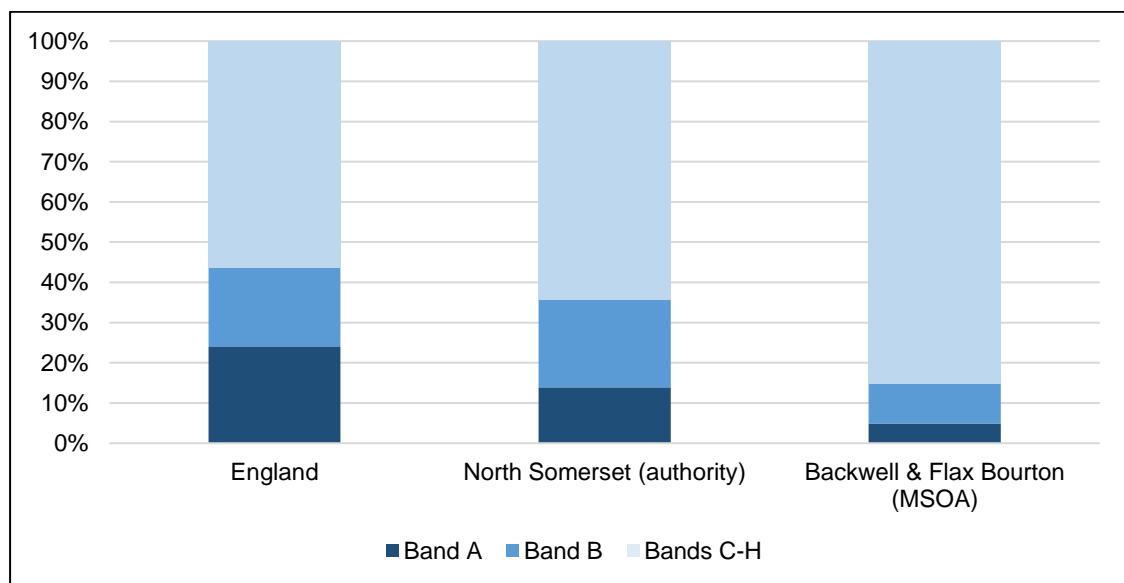


Source: VOA

Council Tax

- 7.41 The Valuation Office Agency (“VOA”) collates data in respect of the number of properties within each Council Tax Band, broken down by nation, authority and Middle-Layer Super Output Area (“MSOA”). Backwell lies in the Backwell and Flax Bourton MSOA.
- 7.42 Council Tax Bands A and B represent the council tax bands for the lowest valued properties in an area and are therefore properties that are those most likely to be affordable to those on low incomes.
- 7.43 The data demonstrates that in North Somerset at 31 March 2021, some 36% of properties were in Bands A and B; less than the 44% of properties in these bands across England. In Backwell the situation is even more pronounced, with just 15% of properties in Bands A and B.

Figure 7.9: Council Tax Bands, North Somerset and Backwell & Flax Bourton, 2021

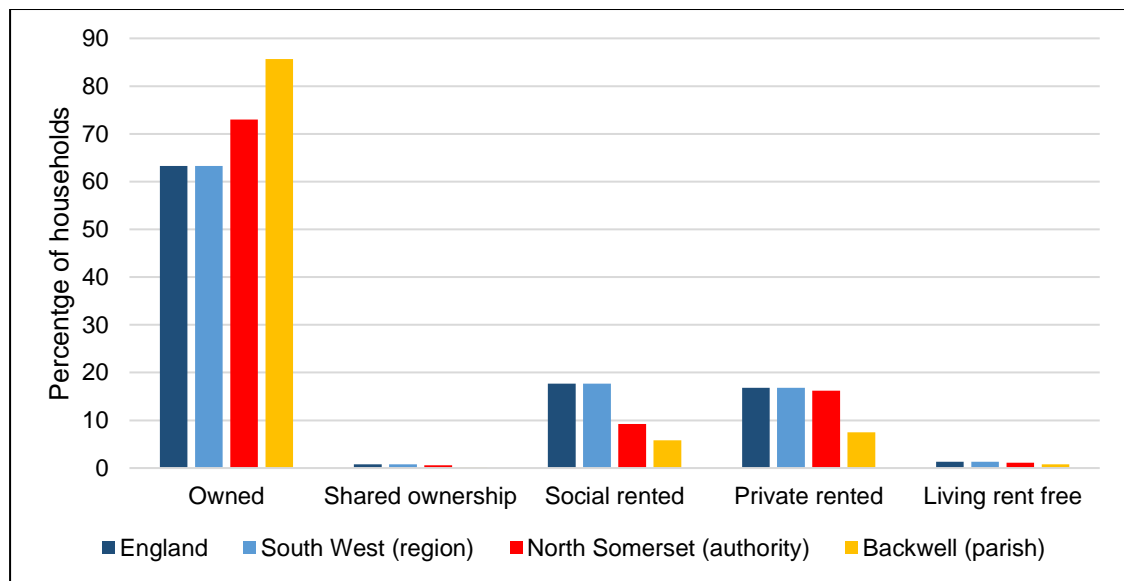


Source: VOA

Tenure

- 7.44 Figure 7.10 below illustrates the breakdown of tenures within England, the South West region, North Somerset, and Backwell Civil Parish, using data from the 2011 Census.

Figure 7.10: Tenure, North Somerset and Backwell, 2011



Source: Census 2011

- 7.45 The data show that the tenure mix in North Somerset leans towards home ownership, with 73% of households owning their own home (compared with 63% in both the South West and in England). A correspondingly smaller proportion of households in North Somerset occupy a social rented home, at just 9% of households (compared with 18% in both the South West and in England).
- 7.46 Notably, the private rented sector in North Somerset is similar in scale to that in the nation and region, at 16% of households (compared with 17% in both the South West and in England). However, with the low proportion of social rented homes in the authority area, the private rented sector accounts for nearly twice as many households in North Somerset than the social rented sector.
- 7.47 The data also show that the tenure mix in Backwell is even further skewed towards home ownership, with a significant 86% of households owning their home. Similarly, the tenure mix is skewed further away from social renting, with just 6% of households occupying a social rented home. There is a smaller private rented sector in Backwell, at 8% of households, which is still a larger proportion than those who occupy a social rented home.
- 7.48 Levels of shared ownership are low across North Somerset, the nation and the region.

Conclusions on Affordability Indicators

- 7.49 As demonstrated through the analysis in this section, affordability in North Somerset has been and continues to be in crisis.
- 7.50 House prices and rent levels in both the average and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in North Somerset out of the reach of more and more people.
- 7.51 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in North Somerset, with a median house price to income ratio of 9.47. This multiple has increased by 40% since the adoption of the Core Strategy in 2012.
- 7.52 House prices and rents in North Somerset have increased since adoption of the Core Strategy, and even faster increases in house prices have been observed in Backwell. With such a small social rented sector in Backwell and in the context of minimal affordable housing delivery, it is plain to see why affordable housing needs are so acute, with 744 preferences on the housing register for Backwell alone.
- 7.53 In short, market signals indicate a worsening trend in affordability in North Somerset and in Backwell and by any measure of affordability, this is an authority area in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

The Consequences of Failing to Deliver Affordable Housing and Weight to be Attributed to the Proposed Affordable Housing Provision

Section 8

8.1 This section draws together the analysis of the affordable housing context set out in the previous six chapters of this Proof of Evidence. At the end, I draw conclusions on the weight to be attributed to the proposed affordable housing provision in the planning balance.

The Consequences of Failing to Deliver Affordable Housing

8.2 The National Housing Strategy sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.

8.3 In May 2021, Shelter published its report '*Denied the Right to a Safe Home – Exposing the Housing Emergency*' (CD-I19) which sets out in stark terms the impacts of the housing crisis. The report affirms that Affordability of housing is the main cause of homelessness (page 15) and that *“we will only end the housing emergency by building affordable, good quality social homes”* (page 10).

8.4 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years, the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

“Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it’s damp, cramped, or away from jobs and support networks.” (Page 5)

“... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option.” (Page 5)

“The high cost of housing means the private-rented sector has doubled in size over the last 20 years. Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability.” (Page 6)

“If you live in an overcrowded home, you’re more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer.” (Page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding” (Page 10)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%).” (Page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (Page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn.” (Page 25)

“Landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.” (Page 29)

“A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing.” (Page 30)

- 8.5 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market. The report notably concludes at page 33 that *“when it comes down to it, there’s only one way to end the housing emergency. Build more social housing”*.

The Need for Affordable Housing

- 8.6 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The revised NPPF (2021) is clear that the Government seeks to significantly boost the supply of housing.
- 8.7 The Council’s adopted Core Strategy and emerging Local Plan consultation papers highlight a pressing need for affordable housing and poor housing affordability in North Somerset.
- 8.8 There is an acute need for affordable homes in North Somerset. My analysis in section 6 identifies that a shortfall of 9,409 affordable dwellings (net of Right to Buy losses) has arisen over the SHMA 2009 period between 2009/10 and 2020/21 when compared with the SHMA’s identified need for 904 affordable dwellings per annum.
- 8.9 My analysis in section 6 also identifies that a shortfall of 299 affordable dwellings (net of Right to Buy losses) has arisen since the Core Strategy was adopted in 2012/13 when compared with the Core Strategy policy CS16 target of 150 affordable dwellings per annum. It should be noted that the CS16 target is substantially less than the objectively assessed affordable housing need.
- 8.10 Given the shortfall in affordable housing in North Somerset, the appeal proposals provide 30% affordable housing which will contribute significantly to addressing this key corporate priority.
- 8.11 The Council’s record of past delivery should be viewed in the context of the fact that at March 2021 there were 2,306 households on the Housing Register with an

identified affordable housing need within North Somerset. It is important to remember that these are real people, in real need, now.

- 8.12 In addition to the shortfall in delivery against the identified affordable housing need in the SHMA and the CS16 target, other indicators further point to a chronic affordability crisis in North Somerset. House prices and private rents are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. Affordability ratios at the median and lower quartile levels in North Somerset are worse than in the nation and region, and have worsened at a faster rate over the Core Strategy period than in the nation and region.
- 8.13 At the settlement level, house prices in Backwell are significantly higher than in the authority level and have increased at a faster rate. The tenure mix in Backwell is skewed clearly to owner occupation with a correspondingly smaller social rented sector and virtually no shared ownership housing at all.

The Council's Assessment of the Application

- 8.14 The Officers' Report (**CD-C1**) records an element of public support for the principle of affordable housing. At page 7 the report notes the comments of Backwell Residents Association which include "*Support inclusion of affordable housing*". At page 8, the report notes that three letters of support were received and notes that one of the reasons given was "*Support if includes affordable homes and smaller homes for downsizing*".
- 8.15 The Officer's Report also reports the comments of the Housing Development Officer (**CD-B15**), which contain advice in respect of affordable housing mix and tenure, and the detailed provisions of the affordable housing to be secured through the Section 106 agreement. The Housing Development Officer's response does not go into the merits of the proposed affordable housing provision or its weight in the planning balance.
- 8.16 The Officers' Report sets out the planning balance of the scheme at pages 19 and 20. The planning balance recognises the benefit of affordable housing as one which merits 'significant' beneficial weight. The Officers' Report states at page 20 that:

"Nonetheless, this site could make a substantial contribution to North Somerset's supply of housing, including affordable housing, in a relatively sustainable location. This carries significant weight in favour of the proposal".

8.17 In my opinion, the Officers' Report rightly identifies the provision of affordable housing as a benefit of the proposal. However, the Council's assessment of the application to date has not included the in-depth consideration of performance against affordable housing needs or the CS16 policy target; nor has it considered the array of affordability indicators in North Somerset. In my view, these are important factors when determining the weight to be attributed to the proposed affordable housing provision.

Relevant Secretary of State and Appeal Decisions

8.18 The importance of affordable housing as a material consideration has been reflected in a number of Secretary of State and appeal decisions. Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations.

Appeal Decision: Scot Elm Drive, Weston-super-Mare (18 March 2015) (CD-J29)

8.19 In considering an appeal which provided for up to 22 affordable homes in 2015, at which my former Tetlow King Planning colleague presented evidence, the Inspector considered the relevance of identified affordable housing need and the Core Strategy affordable policy target, which I have discussed in greater detail at Section 6 of this Proof of Evidence.

8.20 The Scot Elm Drive decision identifies a number of affordable housing issues which remain prevalent in 2022, some seven years later. Paragraph 49 at page 10 of the decision highlights concerns in the Core Strategy that "there are serious housing affordability issues with affordable housing completions falling well below the required amount"; paragraph 50 noted that "*The Inspector conducting the examination of the remitted Core Strategy has also identified that there is a substantial need for affordable housing in North Somerset*".

8.21 Paragraph 50 also indicates that low rates of delivery of affordable housing in the face of high levels of need in North Somerset have persisted since 2006, noting that "*the appellant's uncontested evidence identifies that the housing register for the area currently stands at 3,543 households and, as summarised below, there has not been a significantly high level of delivery of affordable homes in the district since 2006*".

8.22 The Inspector concludes at paragraph 52 that the affordable housing provision “*would make a valuable contribution to identified housing need*” before finding that “*the need for both market and affordable housing carries substantial weight in favour of the proposal*” (my emphasis).

Appeal Decision: Oldmixon Road, Weston-super-Mare (10 April 2017) (CD-J30)

8.23 The appeal proposals made provision for 150 dwellings of which 30% (45 dwellings) would be provided as affordable housing. Paragraph 92 of the Inspectors report acknowledged that the Sustainable Community Strategy “*recognises that one of the main challenges is the growing number of people seeking social housing in the area*” and that “*it is apparent that the need for more affordable housing in North Somerset has been, and continues to be, an issue of concern.*”

8.24 The Inspector went on at paragraph 94 to note the 3,608 households on the Housing Register at 1 April 2016 with paragraph 95 referring to the fact that the average waiting time for an affordable home in North Somerset was 735 days. In addition to which reference was drawn to the 34% increase in homelessness, high levels of affordability ratios and 32% house price increase over the past five years. Following on from this at paragraph 96 he found that “*the need in the district is glaring with a significant number of people having bleak housing prospects for the foreseeable future*”. At section 7 of this Proof of Evidence, I set out further detail on the latest waiting times data which reveal a situation little changed since the Oldmixon Road appeal was determined.

8.25 Furthermore, the Inspector made clear at paragraph 97 that “*although the Council sought to undermine the veracity of the affordable housing obligation, in the absence of a viability appraisal, nothing of any substance was placed before me. It is also telling that the appellant has not considered the 30% contribution to be unrealistic on the grounds of lack of viability*”.

8.26 Paragraph 101 set out that the Inspector considered the proposed affordable housing carried substantial weight in the planning balance, noting that he “*remain[ed] content to afford substantial weight to the benefit arising from the market and affordable homes which the scheme would deliver*”.

Secretary of State Decision: Pulley Lane, Droitwich Spa (July 2014) (CD-J31)

- 8.27 The Inspector recognised that the contribution of the scheme in meeting some of the affordable housing deficit in the area cannot be underestimated (Inspector’s Report, Page 89). The Inspector set out under paragraph 8.123 of their Report that:

“The SOS should be aware that a major plank of the Appellant’s evidence is the significant under provision of affordable housing against the established need Figure and the urgent need to provide affordable housing in Wychavon. If the position in relation to the overall supply of housing demonstrate a general district-wide requirement for further housing, that requirement becomes critical and the need overriding in relation to the provision of affordable housing. The most recent analysis in the SHMA (found to be a sound assessment of affordable housing needs) demonstrates a desperate picture bearing hallmarks of overcrowding, barriers to getting onto the housing ladder and families in crisis.”

- 8.28 The Inspector continued under paragraph 8.123 of his report to state that *“the SHMA indisputably records that affordability is at crisis point. Without adequate provision of affordable housing, these acute housing needs will not be met. In terms of the NPPF’s requirement to create inclusive and mixed communities at paragraph 50, this is a very serious matter. Needless to say, these socially disadvantaged people were not represented at the Inquiry.”*

- 8.29 The level of significance attached to affordable housing provision was addressed through paragraph 8.124 of the Inspectors Report where he stated that:

“These bleak and desperate conclusions are thrown into even sharper focus by an examination of the current circumstances in Wychavon itself. Over the whole of the District’s area, there is presently a need for 268 homes per annum. These are real people in real need now. Unfortunately, there appears to be no early prospect of any resolution to this problem...Given the continuing shortfall in affordable housing within the District, I consider the provision of affordable housing as part of the proposed development is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission” (Inspectors Report, page 111).

8.30 This statement is supplemented at paragraph 8.125 by the Inspector considering that *“from all the evidence that is before me the provision of affordable housing must attract very significant weight in any proper exercise of planning balance.”*

8.31 The Secretary of State concluded that both schemes delivered *“substantial and tangible”* benefits, including the delivery of 40% “much needed” affordable housing.

Appeal Decision: Oxford Brookes University, Wheatley Campus, College Close, Wheatley, Oxford (23 April 2020) (CD-J28)

8.32 The SoS’ decision at Oxford Brookes University, Wheatley Campus, College Close, Wheatley, Oxford, dated 23 April 2020, underlines the importance of the housing register and in meeting affordable housing needs. Inspector DM Young asserted, at paragraph 13.101 at page 74 of his report, that in the context of a lengthy housing register of 2,421 households *“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses”* (my emphasis). He went on to state that *“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list”* before concluding that *“Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”* (my emphasis).

8.33 In the planning balance the Inspector stated that, *“The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”* (my emphasis).

8.34 In allowing the appeal, the Secretary of State concurred with these findings, including that the delivery of houses, and affordable houses *“are both considerations that carry very substantial weight”*.

8.35 The Secretary of State’s decision also underlines the importance of addressing needs on the Housing Register in the face of acute needs and persistent under delivery. At 2,306 households in March 2021, the Housing Register in North Somerset is very similar in its scale to that which was considered in the Oxford Brookes decision.

**Appeal Decision: Coalpit Heath, South Gloucestershire (September 2018)
(CD-J2)**

8.36 In this appeal the Inspector considered whether policy-compliant levels of affordable housing would generate a benefit in the planning balance, rather than be considered as merely compliant with policy and thus carrying neutral weight. At paragraph 61 of the decision, the Inspector sets out their clear conclusion:

“The fact that the much needed AH [affordable housing] and CBH [custom build housing] are elements that are no more than that required by policy is irrelevant – they would still comprise significant social benefits that merit substantial weight” (my emphasis).

Overview of Secretary of State and Appeal Decisions

8.37 The selection of decisions above emphasise the great weight which both Inspectors and the Secretary of State have, on various occasions, attached to the provision of affordable housing in the consideration of planning appeals.

8.38 Some of the key points I would highlight from these examples are that:

- Affordable housing is an important material consideration;
- An Inspector has previously considered that the need for affordable housing in North Somerset is a cause for concern; that there are bleak prospects in the authority area for those in housing need; and that affordable housing delivery merits substantial weight; and
- Planning Inspectors and the Secretary of State have attached substantial weight to the provision of affordable housing.

Conclusions on Weight to be attributed to the Proposed Affordable Housing Provision

8.39 I consider that the evidence demonstrates that there is an acute need for affordable housing in North Somerset. The SHMA 2009 identified a need for 904 net affordable homes per annum between 2009 and 2021. Against this figure, a shortfall of 9,409 dwellings has arisen; an eye-watering underperformance against the objectively assessed affordable housing needs of North Somerset. Against the much lower policy target of 150 dwellings per annum set out at policy CS16, the Council has underdelivered by 136 dwellings between 2006/07 and 2020/21. Looking ahead, the

future deliverable supply of affordable housing is not sufficient to meet identified needs.

- 8.40 There were 2,306 households on the Council's Housing Register in March 2021 with an identified need for an affordable home in North Somerset. These are households in priority need who are facing hardship as a result of their housing situation. The NPPF definition of affordable housing is much broader than meeting just those on the housing register and there is also a substantial cohort of households in North Somerset who are unable to purchase a home without support.
- 8.41 The appeal proposals offer 30% affordable housing which meets the requirements of adopted Core Strategy policy CS16. It is my view that this will make a substantial contribution to meeting the identified needs in North Somerset. In light of the extent of the unmet need in North Somerset I consider that every one of the affordable dwellings proposed through the appeal scheme will be occupied by a household in need. I am strengthened in that view by reference to the series of appeal decisions which I have cited above: the provision of affordable housing, especially in the context of a deficit in supply, has been judged to be an important material consideration, often carrying substantial or even very substantial weight.
- 8.42 I fully expect the council to merely state that affordable housing is a benefit meriting significant weight. However, in my view the Council's assessment of the application to date has not taken into account the breadth and scale of the need for affordable housing in North Somerset and Backwell. The data I present demonstrates an acute position. This is aptly demonstrated not least by 744 households, 32% of the entire register, expressing a need to live in Backwell.
- 8.43 Furthermore, given the Council's past poor performance towards meeting its identified housing needs across the authority area, I consider that **substantial weight** should be afforded to the delivery of affordable housing through the appeal scheme in the planning balance.

Appendix JS5

Affordable Housing Forward Supply Review



North Somerset 5YHLS - Affordable Housing Analysis

Formatted to read on-screen

RLS Ref.	Application Ref.	Site Address	Proposal	Total units (Gross)	Total units (Net)	TKP Ref.	AH Policy Threshold %age	Proposed Affordable Housing Contributions					NPN Projected Supply	TKP Projected AH Supply	HLS Source / comments	
								Contribution type	On Site AH units	On Site AH %age	Commuted Sum					
Large sites with detailed planning permission																
4/660	16/P/5239/COA	Waverley House, Old Church Road, Clevedon	Conversion of vacant office buildings to 17 flats	17	17	TKP 1	30%	None	0	0	0	0	0	0	0	CLL form dated 13/01/2019
4/666	17/P/1078/F	2-6 Bay Road, Clevedon	Change of use from nursing home to 19 flats	19	19	TKP 2	30%	Commuted Sum	0	0	£48,782,15	19	0	0	0	S106 dated 05/06/2017
4/667	19/P/1719/RM	Court Farm, All Saints Lane, Clevedon	Erection of 9 new dwellings on allocated site	9	9	TKP 3	30%	None	0	0	0	0	0	0	0	Fewer than 10 dwellings proposed
4/698	18/P/4846/FUL	Land at 173-175 Kenn Road, Clevedon	Redevelopment for retirement and 54 self contained units	54	54	TKP 4	30%	None	0	0	0	54	0	0	0	CLL form dated 12/06/2019
4/639	17/P/1250/F	Land at Engine Lane, Nailsea	171 dwellings	171	171	TKP 5	30%	On site	51	30%	0	171	51	51	51	Site Layout Plan dated 28/07/2021
4/596a	20/P/2347/RM	Youngwood Lane Phase 1	Erection of 168 units pursuant to 16/P/1677/OT2	168	168	TKP 6	30%	On site	50	30%	0	168	50	50	50	Affordable Housing and Supporting Statement dated 28/09/2020
4/665	16/P/2066/F	Harbour Road/Gordano Gate, Portishead	93 dwellings and office unit	93	93	TKP 7	30%	On site	29	30%	0	33	10	10	10	Affordable Housing Statement dated 07/09/2016
4/670	17/P/1229/F	Land at Wyndham Way, off Cheviot Meadow	33 dwellings	33	33	TKP 8	30%	On site	11	30%	0	0	0	0	0	Affordable Housing Statement dated 01/06/2017
4/671	18/P/3512/FUL	Site V2, Harbour Road/Martingale Way, Portishead	Residential development comprising 26 apartments	26	26	TKP 9	30%	On site	8	30%	0	26	8	8	8	Officer Report dated 8/11/2019
4/440	08/P/0626/RM	Land adj Plum Tree Farm, off Summer Lane, WSM	Residential development - 8 units	8	8	TKP 10	30%	None	0	0	0	0	0	0	0	Fewer than 10 dwellings proposed
4/087	19/P/2933/MMA	Atlantic Road South, WSM	Erection of 18 flats	18	18	TKP 11	30%	None	0	0	0	18	0	0	0	S73 application pursuant to original consent 04/P/2089/F which contains no S106 or conditions which require affordable housing.
4/616	20/P/0792/FUL	Land at Scot Elm Drive, WSM	Residential development of 57 dwellings	57	57	TKP 12	30%	On site	11	20%	0	57	11	11	11	Officer report dated 23/04/2021
4/658	18/P/3468/RM	Land at Wentwood Drive, WSM	Residential development of up to 50 dwellings	50	50	TKP 13	30%	On site	15	30%	0	0	0	0	0	Officer report dated 04/12/2018
4/649	17/P/1832/F	Former TJ Hughes store, 17 High Street, Weston-super-Mare	Redevelopment incorporating retail on ground floor and 19 flats on upper floors	19	19	TKP 14	30%	None	0	0	0	0	0	0	0	Decision dated 29/06/2018
4/675	17/P/0752/F	Land at Wilton Gardens/Scot Elm Drive, WSM	Erection of 49 dwellings	49	49	TKP 15	30%	On site and Commuted Sum	6	12%	£104,069	£30	4	4	4	Officer Report dated 08/02/2019
4/672	18/P/4932/FUL, 18/P/4930/FUL, 18/P/4934/FUL, 18/P/4936/FUL	Dauncey's Hotel, Claremont Crescent, WSM	Conversion of hotel to a total of 28 dwellings	28	28	TKP 16	30%	None	0	0	0	28	0	0	0	Officer Reports dated 26/04/2019
4/688	18/P/4822/FUL	69-71 Locking Road, WSM	Change of use from guest houses and erection of new buildings to create 11 flats	11	11	TKP 17	30%	None	0	0	0	11	0	0	0	Officer Report dated 05/04/2019
4/362a	19/P/0413/FUL	Westlakes Caravan Park, West Wick, WSM	Erection of 125 dwellings	125	125	TKP 18	30%	On site	37	30%	0	125	38	38	38	Affordable Housing Plan dated 25/09/2019
4/695	19/P/1246/FUL	Parkside, Grove Road, WSM	Change of use from office to student accommodation	39	39	TKP 19	30%	None	0	0	0	0	0	0	0	CLL form dated 21/05/2019
4/696	19/P/1848/FUL	1 Clevedon Road, Weston-super-Mare	Change of use from residential care home to 13 self contained units of C3 supported housing	13	13	TKP 20	30%	None	0	0	0	0	0	0	0	Officer report dated 27/11/2019
4/664	20/P/0337/RM	Land North of Oldmixon Road, WSM	Erection of 130 dwellings	130	130	TKP 21	30%	On site	39	30%	0	119	38	38	38	Officer report dated 03/06/2020
4/697	18/P/3335/FUL	Madeira Cove Hotel, Birnbeck Road, WSM	Demolition of guest house and erection of 10 flats	10	10	TKP 22	30%	None	0	0	0	10	0	0	0	Planning Statement dated 11/06/2018
4/562	19/P/2018/FUL	Lynton House Hotel, Madeira Road, WSM	Demolition of existing buildings and erection of 40 flats	40	40	TKP 23	30%	None	0	0	0	40	0	0	0	Officer Statement dated 22/01/2021
4/704	19/P/3151/FUL	39-40 Birnbeck Road	Conversion of existing buildings to form 26 residential flats	26	26	TKP 24	30%	None	0	0	0	26	0	0	0	Officer Report dated 04/12/2020
4/706	20/P/1059/FUL	Land adjacent to Diamond Batch, Summer Lane	Erection of 20 affordable C2 extra care apartments	20	20	TKP 25	30%	On site	20	100%	0	20	20	20	20	Officer Report dated 11/01/2021
4/632a	18/P/2344/RM	Arnolds Way Phase 2, Yatton	Erection of 72 dwellings	72	72	TKP 26	30%	None	0	0	0	0	0	0	0	Officer Report dated 26/02/2019
4/634	17/P/1894/RM	Land at Pudding Pie Lane East, Churchill	Erection of up to 141 dwellings	141	141	TKP 27	30%	On site	42	30%	0	28	8	8	8	Officer report dated 21/12/2017
4/633	17/P/2560/RM	Land at SAYS Lane, Churchill	Residential development of up to 43 dwellings	43	43	TKP 28	30%	On site	13	30%	0	0	0	0	0	Officer report dated 20/06/2018
4/600	18/P/2169/RM	Moor Lane Backwell	Erection of 65 dwellings	65	65	TKP 29	30%	On site	20	30%	0	20	6	6	6	Site Layout Plan dated 02/04/2019
4/632	18/P/2170/RM	Arnolds Way Phase 2 sheltered housing, Yatton	Erection of a sheltered housing scheme providing 60 units	60	60	TKP 30	30%	None	0	0	0	0	0	0	0	Sheltered housing project, Undeas from submitted material what element, if any, will be affordable.
4/655	18/P/2275/RM	Land to the east of Wolvershill Road, Banwell	Erection of 44 dwellings	44	44	TKP 31	30%	On site	13	30%	0	0	0	0	0	Officer report dated 25/10/2018
4/636	18/P/3708/RM	Land south of Cobhorn Way, Congresbury	Erection of up to 38 dwellings	38	38	TKP 32	30%	On site	11	29%	0	0	0	0	0	Officer report dated 03/01/2019
4/676	18/P/3367/RM	Land south of Cadbury Garden Centre, Congresbury	Erection of 21 dwellings	21	21	TKP 33	30%	On site	2	10%	0	21	2	2	2	Officer report dated 24/01/2019
4/699	20/P/1690/RM	Land south of William Daw Close, Banwell	Erection of 26 dwellings	26	26	TKP 34	30%	On site	8	30%	0	26	8	8	8	Officer report dated 25/03/2021
4/590a	18/P/3214/RM	Woodborough Farm, Winscombe	Erection of 155 dwellings pursuant to outline 15/P/1979/O for a total of 175 units	155	155	TKP 35	30%	On site	53	34%	0	120	41	41	41	Officer report dated 15/02/2019
4/590b	19/P/1866/RM	Woodborough Farm, Winscombe (Phase 2)	Erection of 20 dwellings pursuant to 15/P/1979/O	20	20	TKP 36	30%	On site	6	30%	0	20	6	6	6	Officers report - reference to outline S106 REQUIREMENT 30% of overall outline scheme 15/P/1979/O (175 dwellings)
4/590c	19/P/3045/RM	Woodborough Farm, Winscombe (Phase 3)	Erection of 5 dwellings	5	5	TKP 37	n/a	None	0	0	0	5	0	0	0	Fewer than 10 dwellings proposed
4/681	18/P/4241/RM	Land south of Bristol Road, Churchill	Erection of 40 dwellings	40	40	TKP 38	30%	On site	11	28%	0	38	11	11	11	Officer delegated report
4/680	18/P/2691/RM	Land at Cox's Green, Wington	Erection of 59 dwellings	55	55	TKP 39	30%	On site	18	30%	0	45	14	14	14	Officer delegated report
4/680a	18/P/2692/RM	Land at Cox's Green, Wington	Erection of 4 dwellings	4	4	TKP 40	n/a	None	0	0	0	0	0	0	0	Fewer than 10 dwellings proposed
4/685	17/P/2377/F	Titan Ladders, Mendip Road, Yatton	Demolition of existing buildings and erection of 37 new dwellings	37	37	TKP 41	30%	None	0	0	0	0	0	0	0	Affordable housing statement indicates that vacant building credit sought. No section 106 attached to permission.
4/631	19/P/1684/RM	Land at North End, Yatton	Erection of 154 dwellings	154	154	TKP 42	30%	On site	46	30%	0	149	45	45	45	Officer report - reference to S106 attached to 15/P/0946/O
4/693	20/P/2144/FUL	Land at Smallway, Congresbury	Erection of 25 dwellings	25	25	TKP 43	30%	On site	25	100%	0	25	25	25	25	Officer report - refers to dwellings "to be provided as affordable housing and secured via S106 agreement." * Fall back position of 30% AH.
4/687	19/P/0834/COA	Land north east of Egret Drive, Arnolds Way, Yatton	Erection of 28 dwellings	28	28	TKP 44	30%	On site	8	30%	0	8	2	2	2	Officer delegated report
4/705	20/P/2574/COA	Unit C, Estune Business Park, Long Ashton	Change of use from offices to 24 dwellings	24	24	TKP 45	30%	None	0	0	0	24	0	0	0	Decision notice - permitted development
4/707	20/P/1665/COA	Unit A, Estune Business Park, Long Ashton	Change of use from offices to 18 dwellings	18	18	TKP 46	30%	None	0	0	0	18	0	0	0	Decision notice - permitted development
4/630	19/P/0230/RM	Land at Western Trade Centre, Knightcote Road, Banwell	Erection of 10 dwellings following demolition of existing buildings	10	10	TKP 47	30%	None	0	0	0	10	0	0	0	Planning Statement attached to 15/P/0668/O - indicates scheme is below 100sqm threshold
4/661	17/P/1146/RM	Winford Coach Station, 10 High Street, Winford	Demolition of existing buildings and erection of 11 new dwellings	11	11	TKP 48	30%	Commuted sum	0	0	Unknown	0	0	0	0	Officer report states "commuted sum with the developer towards the provision of affordable housing and this has been built into the s106 attached to the outline consent." Unable to locate original S106 to confirm amount.
4/686	18/P/3461/FUL	Leonard Elms, Brinsea Road, Congresbury	Convert part of care home to 11 self contained extra care apartments	11	11	TKP 49	30%	None	0	0	0	11	0	0	0	Officer report - care home
4/689	17/P/1339/F	Walton Bay Caravan Park, Coast Road, Walton-in-Gordano	Creation of handstandings to accommodate, and siting of, 14 residential caravans for permanent occupation	14	14	TKP 50	30%	None	0	0	0	0	0	0	0	No mention of AH in decision notice (Residential caravans)
4/653	17/P/1799/RM	Land to the north of the A366, Sandford	Erection of 118 dwellings and associated works (including demolition of an existing property to accommodate access)	118	118	TKP 51	30%	On site	35	30%	0	16	5	5	5	Officer report - reference to S106 but cannot be located
4/683	18/P/3659/FUL	Former UTAS site, Claverham Works, Bishops Road, Claverham	Demolition of former factory building and development of 77 dwellings	77	77	TKP 52	30%	None	0	0	0	69	0	0	0	Officer report - Vacant building credit
4/701	20/P/1260/FUL	Golden Acres Fruit Farm, Clevedon Road, Tickenham	Erection of 18 dwellings	18	18	TKP 53	30%	Commuted sum	2	13%	Unknown	0	0	0	0	Officer report - Vacant building credit applies. Financial contribution for 0.4 AH units but amount not specified.
4/654	20/P/0413/RM	Land at Tickenham Garden Centre, Clevedon Road, Tickenham	Redevelopment of vacant garden centre site to provide 32 new dwellings and 900sqm office space	32	32	TKP 54	30%	On site	11	0	0	32	0	0	0	Page 5 of Officers Report confirms nil affordable housing provision due to vacant building credit.
4/708	19/P/1963/FUL	Blagdon Water Garden Centre	Redevelopment of site to create 11 dwellings	11	11	TKP 55	30%	Commuted sum	0	0	£338,000.00	11	0	0	0	Officer report confirms commuted sum. Application 21/P/1827/MCO to remove commuted sum due to viability, decision yet to be made.
4/662	15/P/2301/F	Barrow Hospital (1)	Erection of 66 dwellings	66	66	TKP 56	30%	Commuted sum	0	0	£442,386.10	66	0	0	0	S106 dated 12 January 2018
4/663	15/P/2302/F	Barrow Hospital (2)	Erection of 14 dwellings	14	14	TKP 57	30%	Commuted sum	0	0	£93,838.50	14	0	0	0	S106 dated 12 January 2018
Large sites with outline planning permission																

4/597	17/P/0712/O 20/P/1186/RM	Land adjacent to Sweet Briar, West End, Nailsea	Erection of 6 dwellings	6	6	TKP 58	30%	None	0	0	0	6	0	17/P/0712/O - Officers report dated, 04/05/2018
4/596	16/P/1677/OT2	Land north of Youngwood Lane, Nailsea	Erection of 450 dwellings (capacity reduced to take account of RM phases)	282	282	TKP 59	30%	On site	135	30%	0	0	0	S106 dated 31/03/2020 and appeal decision dated 02/12/2019
4/595	18/P/5234/OUT	Land off Trendwood Way, Nailsea	Erection of 24 dwellings	24	24	TKP 60	30%	On site	7	27.5%	0	0	0	Officers report dated 12/08/2021
4/646	17/P/1138/O	Land at Bridgwater Road, Weston-super-Mare	Erection of 60 dwellings	60	60	TKP 61	30%	On site	18	30%	0	60	18	Officers report dated 06/02/2019
4/702	18/P/3038/OUT	Land to the west of M5 and east of Trenchard Road WSM	Erection of 75 dwellings	75	75	TKP 62	30%	On site	23	30%	0	0	0	Officers report dated 09/11/2021
4/659	16/P/1521/O	Land at Wrington Lane, Congresbury	Residential development of 50 dwellings	50	50	TKP 63	30%	On site	15	30%	0	50	15	Officers report dated 01/02/2017
4/524	15/P/1299/O	Oxford Plasma Technology, North End Road, Yatton	Residential development of 55 dwellings	55	55	TKP 64	30%	On site	6	11%	£240,000.00	0	0	Officers report dated 25/08/2015
4/690	18/P/2532/OUT	Land south of Station Road (A370) adjoining Station Close, Congresbury	Erection of 13 dwellings	13	13	TKP 65	30%	On site	4	30%	0	0	0	Appeal decision dated 25/07/2019
4/703	18/P/4735/OUT	Land west of Wolvershill Road and north of Wolvershill Park, Banwell	Erection of 54 dwellings	54	54	TKP 66	30%	On site	16	30%	0	0	0	Committee report dated 15 July 2020
4/682	18/P/2024/OUT	F Sweeting and Son site, Station Road, Sandford	Erection of 16 dwellings	16	16	TKP 67	30%	On site	5	30%	0	0	0	Officers report dated 25/03/2020
4/586	19/P/0835/OUT	Bleaden Quarry, Bleaden	Redevelopment of site for 42 dwellings	42	42	TKP 68	30%	On site	13	30%	0	0	0	Officers report 01/03/2021
4/478	11/P/0006/F	Royal Pier Hotel, Birnbeck Road, Weston-super-Mare	Demolition of hotel and construction of 63 apartments	63	63	TKP 69	30%	None	0	0	0	0	0	Application form and Officers Report dated, 15/05/2019
Strategic Sites														
4/558a-c	10/P/1614/F; 12/P/0760/F; 13/P/0997/OT2; 15/P/1777/RM; 17/P/5631/RM 18/P/2925/RM; 19/P/0032/RM; 21/P/3241/RM	Weston Villages - Locking Parklands	Major mixed use strategic development	1450	1450	TKP 70	30%	On site	388	29%	0	218	63	12/P/0760/F - Committee report states 30% affordable of 150 units = 45 affordable. 13/P/0997/OT2 - S106 agreement includes 343 affordable units which equates to 28.5% of 1200 units.
4/558d	12/P/1286/OT2; 17/P/5588/RM (TW) 18/P/5209/RM (TW) 18/P/5231/RM (Bellway) 20/P/3081/RM (Mead)	Weston Villages - Land south of Churchland Way	Major mixed use strategic development	1150	1150	TKP 71	30%	On site	344	30%	0	506	152	S106 dated 17/04/2015
4/558e	16/P/2758/RG4; 21/P/1220/RM	Weston Villages - Parklands, south of Locking Head Drove	Major mixed use strategic development	700	700	TKP 72	30%	On site	210	30%	0	295	89	Committee report dated, 03/01/2018 states 30% subject to viability and S106 but legal agreement not available online.
4/558f	16/P/1881/OT2; 19/P/1563/RM	Weston Villages - Parklands, Moss Land	Major mixed use strategic development	300	300	TKP 73	30%	On site	90	30%	0	235	71	Officers report dated 17/01/2018
4/558g	16/P/2744/OT2; 19/P/2662/RM	Weston Villages - Parklands, Mead Fields, south of Wolvershill Road	Major mixed use strategic development	250	250	TKP 74	30%	On site	75	30%	0	0	0	Committee report dated, 01/02/2017 states 30% subject to viability and S106 but legal agreement not available online.
4/558i	18/P/3175/FUL	Weston Villages - Locking Parklands Phase 3a	Major mixed use strategic development	36	36	TKP 75	30%	On site	11	30%	0	0	0	Officers report dated 01/04/2019
4/558h		Weston Villages - Parklands residual	Major mixed use strategic development	64	64	TKP 76	30%	None	0	0	0	0	0	NSC housing trajectory dated April 2021. Delivery on site expected beyond five year period.
4/568	Phase 1: 10/P/0756/OT2 13/P/0834/RM 14/P/2723/RM 15/P/2437/RM 15/P/2570/RM 16/P/1842/RM Phase 2: 12/P/1510/OT2 18/P/2337/RM 16/P/2867/RM 20/P/2026/RM	Weston Villages - Winterstoke, Haywood Village	Major mixed use strategic development	2548	2548	TKP 77	30%	On site	295	12%	0	371	45	10/P/0756/OT2 - S106 dated 10/08/2012, 12% affordable housing agreed across phases, with review mechanism in place to allow additional 18% of dwellings to be constructed as affordable (up to maximum of 30%).
Allocated sites														
4/526	-	Moor Lane, Clevedon	Allocated site for residential development	10	10	TKP 78	30%	None	0	0	0	0	0	No planning application
4/605	-	Millcross site, Clevedon	Allocated site for residential development	67	67	TKP 79	30%	None	0	0	0	0	0	No planning application
4/637	-	Land north of Churchill Avenue, Clevedon	Allocated site for residential development	44	44	TKP 80	30%	None	0	0	0	0	0	No planning application
4/638	-	Yeolands Farm, Clevedon	Allocated site for residential development	15	15	TKP 81	30%	None	0	0	0	0	0	No planning application
4/640	-	Land south of The Uplands, Nailsea	Allocated site for residential development	52	52	TKP 82	30%	On site	15	30%	0	52	16	Officers report dated 17/02/2021.
4/596	-	North West Nailsea	Allocated site for residential development	450	450	TKP 83	30%	None	0	0	0	150	0	No planning application
4/668	-	Weston College site, Somerset Square	Allocated site for residential development	28	28	TKP 84	30%	None	0	0	0	0	0	Application undetermined (15/P/0997/O)
4/644	-	Land south of Downside, Portishead	Allocated site for residential development	23	23	TKP 85	30%	None	0	0	0	0	0	No planning application
4/520	-	Bridge Farm, Bristol Road, WSM	Allocated site for residential development	73	73	TKP 86	30%	None	0	0	0	0	0	No planning application
4/443	-	Orchard House, Ebdon Road, WSM	Allocated site for residential development	12	12	TKP 87	30%	None	0	0	0	0	0	No planning application
4/591	-	Land to the west of Winterstoke Road Weston-super-Mare	Allocated site for residential development	70	70	TKP 88	30%	None	0	0	0	0	0	Application form dated 23/09/2021 - 99 flats for market housing, S106 PLANNING OBLIGATION REQUEST submitted by LPA for 30% affordable (30 dwellings).
4/619	-	Birnbeck Pier and Environs, Weston-super-Mare	Allocated site for residential development	50	50	TKP 89	30%	None	0	0	0	0	0	No planning application
4/592	-	Land to the rear of Locking Road, Weston-super-Mare	Allocated site for residential development	24	24	TKP 90	30%	None	0	0	0	0	0	No planning application

4/645	-	Station Gateway, Weston-super-Mare	Allocated site for residential development	429	429	TKP 91	30%	None	0	0	0	0	0	No planning application
4/602	-	Mead Vale Shopping Centre, Nightingale Close, Worle, Weston-super-Mare	Allocated site for residential development	34	34	TKP 92	30%	None	0	0	0	0	0	Viability Assessment dated 28/09/2021 "proposed scheme only achieves financial balance against industry standard measures with no affordable housing provision".
4/622	-	Gas works, Weston-super-Mare	Allocated site for residential development	95	95	TKP 93	30%	None	0	0	0	0	0	No planning application
4/594	-	Land south of Healin Way (Avoncrest site), Weston-super-Mare	Allocated site for residential development	750	750	TKP 94	30%	None	0	0	0	0	0	No planning application
4/647	-	Former Bourneville School site, Selworthy Road, Weston-super-Mare	Allocated site for residential development	45	45	TKP 95	30%	None	0	0	0	0	0	No planning application
4/648	-	Former Sweat FA site, Winterstoke Road, Weston-super-Mare	Allocated site for residential development	37	37	TKP 96	30%	None	0	0	0	0	0	No planning application
4/611	-	Wallscote Place (Police Station and Magistrates Court), Weston-super-Mare	Allocated site for residential development	70	70	TKP 97	30%	None	0	0	0	0	0	No planning application
4/607b	-	BT building, Boulevard, Weston-super-Mare	Allocated site for residential development, 48 units	48	48	TKP 98	30%	None	0	0	0	0	0	No planning application
4/650	-	Dolphin Square, Weston-super-Mare	Allocated site for residential development	183	183	TKP 99	30%	None	0	0	0	0	0	No planning application
4/674	-	Queensway/Midhaven Rise, Weston-super-Mare	Allocated site for residential development	35	35	TKP 100	30%	None	0	0	0	0	0	No planning application
4/677	-	Land at Shipham Lane, Winscombe	Allocated site for residential development	28	28	TKP 101	30%	None	0	0	0	28	0	Application withdrawn by the applicant (20/P/2724/FUL) Letter dated 07/02/2022.
4/678	-	Land adjoining Coombe Farm, Winscombe	Allocated site for residential development	24	24	TKP 102	30%	None	0	0	0	24	0	Application withdrawn by the applicant (20/P/2724/FUL) Letter dated 07/02/2022.
4/679	-	Broadleaze Farm, Winscombe	Allocated site for residential development	75	75	TKP 103	30%	None	0	0	0	0	0	Application withdrawn by the applicant (16/P/2795/O) Letter dated 12/04/2018.
4/342	-	Land to the east and west of Wemberham Lane, Yatton	Allocated site for residential development	24	24	TKP 104	30%	None	0	0	0	0	0	No evidence of a live application.
4/589	-	Yatton Station, Yatton	Allocated site for residential development	21	21	TKP 105	30%	None	0	0	0	0	0	No planning application
4/654	-	Moor Road, Yatton	Allocated site for residential development	60	60	TKP 106	30%	None	0	0	0	0	0	Appeal site.
4/651	-	Pudding Pie Lane West, Churchill	Allocated site for residential development	35	35	TKP 107	30%	None	0	0	0	0	0	No planning application, 15/P/2521/O Consent lapsed.
4/691	-	Land south of Station Road Adjoining Church Farm, Congresbury (Site B)	Allocation for residential development in the Congresbury NDP (Site B)	20	20	TKP 108	30%	None	0	0	0	0	0	No planning application
4/692	-	Bristol Road (A370) opposite Tesco express store, Congresbury (Site C)	Allocation for residential development in the Congresbury NDP (Site C)	25	25	TKP 109	30%	None	0	0	0	0	0	No planning application
4/694	-	The Causeway, corner of Dolemoor Lane, Congresbury (Site E)	Allocation for residential development in the Congresbury NDP (Site E)	10	10	TKP 110	30%	None	0	0	0	0	0	No planning application
4/608	-	Jackson Barstow House, 28 Thornbury Road, Uphill	Allocated site for residential development	20	20	TKP 111	30%	None	0	0	0	0	0	No planning application
Total contributions													Total 5yr AH Delivery	
£ 1267078													867	