

**TOWN AND COUNTRY PLANNING ACT  
1990 (AS AMENDED) SECTION 78  
APPEAL**

**TOWN AND COUNTRY PLANNING  
(INQUIRIES PROCEDURE) (ENGLAND)  
RULES 2000**

On behalf of:

**Persimmon Homes (Severn  
Valley) Ltd**

In respect of:

**Land at Rectory Farm (North),  
Chescombe Road, Yatton**

**PROOF OF EVIDENCE IN  
RESPECT OF  
AFFORDABLE HOUSING  
PROVISION**

By:

**DAVID PARKER** MSc BA(Hons) DMS FCIH

PINS reference:

**APP/D0121/W/24/3343144**

LPA References:

**23/P/0664/OUT**

Date:

**22<sup>nd</sup> August 2024**

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## **STATEMENT OF TRUTH**

- a) I am David Parker, Chairman of Pioneer Property Services Ltd, and have been appointed by the Appellants to address matters in respect of the need for, and the proposed provision of, affordable housing on the development under consideration.
- b) In that regard I have an Honours degree in Housing, a post-graduate diploma in Management, a Master's degree in Construction Management, and I have been a Fellow of the Chartered Institute of Housing for more than 35 years.
- c) I worked for local authorities, housing associations, a construction company, a national house builder and a PLC property company before establishing Pioneer in 1999. I therefore have 40 years' experience in the management and development of housing and now manage a team of consultants providing housing and residential development expertise throughout England.
- d) I have acted as an Expert Witness for some 25 years and have consequently appeared at numerous round table debates and planning inquiries and have submitted evidence in respect of large and small residential development proposals. The evidence which I have prepared and provide for this appeal reference APP/D0121/W/24/3343144 is true and I confirm that the opinions expressed are my true and professional opinions.

## 1 INTRODUCTION

1.1 This proof of evidence relates to the proposed residential development by Persimmon Homes (Severn Valley) Limited (the “Appellant”) of Land to the North of Rectory Farm, Chescombe, Yatton (the “Appeal Site”) and considers the very substantial material benefits associated with the contribution of affordable housing from the Appeal Site. The Appeal Site is situated within the North Somerset District Council administrative area (“the Council”).

1.2 The Appeal Site is the subject of planning application 23/P/0664/OUT which has been appealed due to non-determination by the Council and is described as an:

*“Outline planning application for the development of up to 190no. homes (including 50% affordable homes) to include flats and semi-detached, detached and terraced houses with a maximum height of 3 storeys at an average density of no more than 20 dwellings per net acre, 0.13ha of land reserved for Class E uses, allotments, car parking, earthworks to facilitate sustainable drainage systems, orchards, open space comprising circa 70% of the gross area including children’s play with a minimum of 1no. LEAP and 2no. LAPS, bio-diversity net gain of a minimum of 20% in habitat units and 40% in hedgerow units, and all other ancillary infrastructure and enabling works with means of access from Shiners Elms for consideration. All other matters (means of access from Chescombe Road, internal access, layout, appearance and landscaping) reserved for subsequent approval.”*

(Planning Statement, Stantec, March 2024 – **A18**)

1.3 The proposed development will provide 50% affordable housing exceeding the policy requirement. Responding to the proposals, the Council’s Housing Development Officer consultation response (17<sup>th</sup> April 2013 – **N1**) states that a 50% affordable housing provision ‘is welcomed on the basis that 30% policy compliant is at nil public subsidy, with a tenure split of 77% social rent and 23% shared ownership’.

1.4 To assist the Inspector to formulate a judgement regarding the importance of affordable housing in the district of North Somerset this Proof of Evidence examines the appropriate weight that should be attributed to the provision of 50% (c.95) affordable dwellings within the context of policy and guidance on the matter, previous determinations by Planning Inspectors, and consideration of the need for additional affordable housing provision in Yatton and across the district compared to the past and planned supply.

1.5 This Proof of Evidence is structured as follows:

- Section 2 of this report provides a brief review of National Planning Policy, the Development Plan and other policy pertinent to affordable housing and summarises the Appeal Site affordable housing proposals and drawing on the affordable housing mix findings in the Yatton LHNA to highlight that the proposals will assist with meeting this need.
- Section 3 summarises the available evidence of affordable housing need in North Somerset and Yatton Parish drawing on a Local Housing Needs Assessment submitted in support of the planning application to which this Planning Appeal relates.
- Section 4 examines sources of affordable housing supply past and present and draws the evidence together and considers the implications of this for the level of additional affordable housing needed in North Somerset and in Yatton Parish.
- Section 5 reviews affordability indicators, establishing the significant pressures facing households seeking to access market housing options for sale and rent.
- Section 6 considers the housing situation nationally, which remains amid a housing crisis, and examines the weight that is routinely applied by the Secretary of State and Planning Inspectors to the proposed provision of affordable housing.
- Section 7 provides a summary and conclusion.

## 2 Policy Context and Affordable housing Proposals

### 2.1 National and Local Policy and Guidance

2.1.1 The National and local Planning policy position remains as that reported in Section 3 of the March 2024 Yatton Parish Local Housing Need Report (“Yatton LHNA” – **B8**) submitted in support of the planning application that is the subject of this Appeal. It can be summarised as follows:

- The provision of affordable housing as a material consideration in the determination of planning applications remains of central importance within national policy and guidance.
- The NPPF (**L2 / online link**) includes the clear objective of ‘significantly boosting the supply of homes’ with overall Local Housing Need being assessed using the Standard Method.<sup>1</sup>
- The NPPG ‘Housing and Economic Needs Assessment’ (**L3 / online link**) confirms that ‘all households whose needs are not met by the market can be considered in affordable housing need’.<sup>2</sup>
- The North Somerset Core Strategy (“CS” – **F1**) Policy CS13 plans for a supply of 20,985 homes overall across North Somerset during 2006 to 2026 (20 years) or c.1,049 per annum.
- CS Policy CS32 defines Yatton as a Service Village
- CS Policy CS14 distributes 2,100 homes across all the Service Villages combined (which includes Yatton).
- CS Policy CS16 ‘Affordable Housing’ targets the delivery of only 150 affordable homes per annum which equates to only c.14% of the overall 1,049 housing supply and falls significantly short of the level of affordable housing need identified within both the 2009 West of England Strategic Housing Market Assessment (“SHMA09” – **H22**) and the North Somerset Local Housing Needs Assessment Report of Findings (October 2023)

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<sup>1</sup> Paragraphs 60 and 61, NPPF

<sup>2</sup> Housing and Economic Needs Assessment Paragraph 018

(“LHNA23” – **H6**); albeit the latter assessment excludes significant numbers of households eligible for affordable housing for sale.

- The Pre-submission Plan 2040 (reg 19) Autumn 2024 consultation has been put on hold pending the outcome of the government July 2024 Planning Reform consultation. The emerging Local Plan remains of **very limited weight**. However, in terms of affordable housing Policy DP43 in the Pre-submission (reg 19) Autumn 2023 Local Plan (“Local Plan 2039” – **G4**) seeks 38.5% affordable housing on eligible Greenfield sites (in a 77% Social Rent and 23% Shared Ownership split where First Homes are not provided) and 20% on eligible previously developed land (“PDL”). **These targets will not be sufficient to meet the backlog in unmet affordable housing need that has accrued in combination with future newly arising need.**
- Yatton Parish has prepared a Neighbourhood Plan (“NHP” – **F6**) which identifies one site for residential development and contains no policies specifically in respect of affordable housing.

2.1.2 On the 2<sup>nd</sup> of August 2024 the Government issued an ‘Open consultation; Proposed reforms to the National Planning Policy Framework and other changes to the planning system’ (“Planning Reform Consultation” – **M1**) and a ‘National Planning Policy Framework: draft text for consultation’ (**M2**). The Planning Reform Consultation proposes significant reforms to both the NPPF and legislation with the consultation ending in September 2024. At present the proposals, therefore, carry limited weight.

## 2.2 Affordable Housing Proposals

2.2.1 The applicant is proposing that 50% (c.95) of the ‘up to 190 homes’ proposed on the Appeal Site will be provided as affordable housing. This exceeds the 30% sought by Policy CS16.

2.2.2 In terms of tenure split it is further proposed that 30% affordable housing will be provided in a tenure split which specifically complies with Policy CS16 of the Core Strategy:

77% Social Rent

23% Shared Ownership

The additional 20% affordable housing will **also** be delivered as Shared Ownership. The affordable housing proposals and the mechanisms for the delivery of the affordable housing are to be set out in a Planning Obligation.

2.2.3 The Yatton LHNA (**B8**) sets out<sup>3</sup> that the LHNA23 suggests that across North Somerset (“NS”) 8,589 households (during 2024-2039 – 15 years) need affordable housing on the basis that they aspire to own their own home but are unable to afford to buy. This suggests that 68% of all households in need of affordable housing would require Affordable Home Ownership (“AHO”).

2.2.4 **Location specific data on the tenure of existing affordable housing stock<sup>4</sup> suggests Yatton has low levels of AHO. Furthermore, affordability within Yatton is suggested to be more challenging than across North Somerset.<sup>5</sup> AHO supply and affordability pressures in Yatton (and across North Somerset<sup>6</sup>) and the district wide unconstrained need for c.68% of affordable housing for AHO suggest that Yatton Parish will benefit significantly from the provision of additional AHO at the levels proposed.**

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<sup>3</sup> Paragraph 5.1.3, Yatton LHNA **B8**

<sup>4</sup> See Figure 2.3 in the Yatton LHNA **B8**

<sup>5</sup> See Figure 2.5 in the Yatton LHNA **B8**

<sup>6</sup> See Section 5 below



### 3 AFFORDABLE HOUSING NEED

#### 3.1 Local Authority Housing Waiting List

- 3.1.1 The Council confirmed on the 15<sup>th</sup> of July 2024 (**Appendix 2**) that there are **2,616 households registered on their Waiting List for affordable housing** to rent across North Somerset. This is a 3% reduction on the figure recorded in January 2024 when the Yatton LHNA<sup>7</sup> (**B8**) was prepared, although the number of households choosing Yatton as their **'area of preference'** declined by less than 1% in the same period. Furthermore, the 2,616 households remain a significant increase over the 2,306 households recorded in March 2021 as needing rented affordable housing in North Somerset.
- 3.1.2 These figures do not include those households in need of affordable housing for sale as there is no central register; instead, the Council rely upon each Registered Provider operating in their area to maintain their own separate lists (the extent of which are neither collated, nor reported, by the Council).

#### 3.2 Local Authority Evidence Base

- 3.2.1 The Yatton LHNA (**B8**) Section 5.1 reviews the LHNA23<sup>8</sup> in detail and, in the absence of sub-area level housing need assessments, draws on the outputs to estimate affordable housing need within Yatton Parish.

##### North Somerset

- 3.2.2 Key outputs for affordable housing need across North Somerset based on the LHNA23 and updated vacancy rates as per the Yatton LHNA are as follows:
- i) Unconstrained affordable housing Need: there is a total need from 12,647 households eligible for affordable housing for 12,913 affordable homes<sup>9</sup> during 2024-2039 (over 15 years – c.861 per annum). This is comprised of:

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<sup>7</sup> Yatton LHNA **B8**

<sup>8</sup> prepared by Opinion Research Services ("ORS") on behalf of North Somerset Council to review the 2024 to 2039 period

<sup>9</sup> the Regulator of Social Housing ("RSH") Statistical Data Return ("SDR") 2023 reports a 2.1% vacancy rate in affordable housing stock in North Somerset and this is applied in the analysis in the Yatton LHNA Section 5.1 and Appendix 1 – see the Yatton LHNA **B8**.

- a. 8,589 households in need of Affordable Home Ownership (“AHO”) on the basis that they aspire to own their own home, can afford market rents, but are unable to afford to buy, and,
- b. a further 4,058 households in need of affordable housing who cannot afford market rents.

The “unconstrained” affordable housing need, which suggests a 68% AHO and 32% other forms of affordable housing tenure split, takes account of all households eligible for affordable housing in accordance with the NPPF definition and NPPG advice on the assessment of affordable housing need.

- ii) Constrained ‘policy-on’ affordable housing need: data in the LHNA23 suggests a requirement from 5,521 households. This equates to 5,637 affordable homes during 2024-2039 (over 15 years – c.376 per annum).<sup>10</sup> This is comprised of:
  - a. 1,463 households in need of AHO and able to afford market rents, and
  - b. a further 4,058 households in need of affordable housing and unable to afford market rents.

Based on LHNA23 assumptions regarding incomes and savings the ‘policy-on’ affordable housing need, which suggests a c.27% AHO and 73% other forms of affordable housing tenure split, excludes a significant number of households eligible for affordable housing under the NPPF affordable housing definition.

### Yatton Parish

3.2.3 In the absence of sub-area level affordable housing need outputs within the LHNA23 it can be broadly estimated need will arise within the Parish at a rate per person that is proportionate with that across the local authority area. This approach has been utilised in the Yatton LHNA<sup>11</sup> which concludes:

- iii) Unconstrained affordable housing Need: there is a total need for 481 affordable homes<sup>12</sup> during 2024-2039 (over 15 years – c.32 per annum). This is comprised of:

<sup>10</sup> when a 2.1% vacancy rate is applied

<sup>11</sup> See paragraphs 5.1.11 to 5.1.20 and Figures 5.1.2 and 5.1.3 of the Yatton LHNA (B8)

<sup>12</sup> when a 2.1% vacancy rate is applied

- a. 327 dwellings for AHO for households aspiring to own their own home, able to afford market rents, but unable to afford to buy, and,
  - b. a further 154 dwellings for households who cannot afford market rents and need affordable housing.
- iv) Constrained 'policy-on' affordable housing Need: a total need for 210 affordable homes<sup>13</sup> during 2024-2039 (over 15 years – c.14 per annum) is suggested. This is comprised of:
- a. 56 dwellings for AHO for eligible households able to afford market rents, and
  - b. a further 154 dwellings for households who cannot afford market rents and need affordable housing.

However, this tenure split is based on assumptions regarding incomes and savings in the LHNA23 which thereby exclude a significant number of households eligible for affordable housing under the NPPF affordable housing definition.

#### 2009 Strategic Housing Market Assessment

- 3.2.4 To understand how unmet affordable housing need will have accrued prior to 2024 it is necessary to consider the 2009 West of England Strategic Housing Market Assessment ("SHMA09" – H22) which forms part of the evidence base underpinning the adopted Core Strategy. This concludes that a net need for 904 affordable homes per annum across the district 2009 to 2021 of which 735 are for rented affordable housing and 169 are for 'intermediate' forms of affordable housing<sup>14</sup> (i.e. AHO).
- 3.2.5 Across Yatton Parish<sup>15</sup> a net need for 34 affordable homes per annum 2009 to 2021 is suggested of which 27 are for rented affordable housing and 6 are for 'intermediate' forms of affordable housing.

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<sup>13</sup> when a 2.1% vacancy rate is applied

<sup>14</sup> Table 4.11, SHMA09

<sup>15</sup> applying the same 'top-down' calculation methodology to the SHMA09 as presented in the Yatton LHNA using the LHNA23 data but applying 2011 Census population data to align more closely with the SHMA09 publication date (see **Appendix 1** to this report)

### 3.3 Demographic Modelling

3.3.1 In the absence of any sub-area level assessment within the LHNA23 or within an assessment underpinning the Yatton NHP, in addition to the 'Top Down' LHNA23 based analysis, demographic projections<sup>16</sup> have been prepared by Pioneer to project future overall housing needs in Yatton Parish.

3.3.2 This process is summarised in Section 4.2 of the Yatton LHNA and reflects differences in population distribution in terms of age and sex at a sub-area level compared to the wider local authority area, providing a fine-grained assessment for the analysis.

3.3.3 The projected household growth, including an affordability adjustment applied in accordance with the current NPPG Standard Method, projects a need for additional housing across all tenures from 596 households in Yatton Parish over a ten-year period 2023 to 2033 (or 59.6 households per annum).

3.3.4 In the absence of any sub-area assessment of affordable housing need, the c.38.5% 'policy-on' constrained and 89.5% unconstrained proportions of overall housing that are suggested in the LHNA23 as being likely to be needed as affordable housing are applied to the Yatton LHNA demographic modelling outputs for affordability adjusted household growth in Yatton Parish.<sup>17</sup>

3.3.5 **The assessment process suggests an:**

i) **Unconstrained affordable housing Need: for 818 affordable homes in Yatton Parish over 15 years ( c.55<sup>18</sup> affordable homes per annum)**

ii) **Constrained 'policy-on' affordable housing Need: for 352 affordable homes in Yatton Parish over 15 years ( c.23<sup>19</sup> affordable homes per annum)**

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<sup>16</sup> taking the 2014-based household projections as the starting point and assessing a 10 year period – 2023 to 2033 - in line with the Standard Method timeframe as set out in the NPPG and the 2023 to 2033 timeframe applied to the Standard Method calculation within the LHNA23 (Figure 9, LHNA23)

<sup>17</sup> See paragraphs 5.2.1 to 5.2.7 and Figure 5.2.1 of the Yatton LHNA (B8).

<sup>18</sup> 54.5 unrounded

<sup>19</sup> 23.45 unrounded

### 3.4 Summary

3.4.1 Based on the analysis within the Yatton LHNA, and a review of the levels of affordable housing need assessed in the SHMA09 (which forms part of the Core Strategy evidence base), the following range of overall affordable housing requirements are suggested to apply per annum across the district and in Yatton Parish 2009/10 to 2028/29:

#### *North Somerset*

- i) 2009/10 to 2023/24 (15 years) – a need for 13,560 affordable homes (i.e. 904 per annum based on the SHMA09 and assuming this applies 2021/22 to 2023/24 in the absence of alternative data)
- ii) 2024/25 to 2028/29 (5 years) – a need for 1,504 (constrained ‘policy on’) to 3,444 (all eligible households) affordable homes (i.e. 376 to 861 per annum based on the LHNA23 applying an updated affordable housing vacancy rate).

#### *Yatton Parish*

Assuming need arises per head of population at a rate commensurate with that suggested for the district (in the SHMA09 and LHNA23), taking account of likely affordable housing vacancy rates and additional affordable housing need projections based on demographic modelling and LHNA23 affordability assumptions, the following range of affordable housing need is suggested:

- i) 2009/10 to 2023/24 (15 years) – a need for 510 affordable homes (i.e. 34 per annum and assuming this continues into 2021/22 to 2023/24)
- ii) 2024/25 to 2028/29 (5 years) – a need for 56 (constrained ‘policy on’) to 128 (all eligible households) affordable homes (i.e. 14 to 55 per annum).

## 4 AFFORDABLE HOUSING SHORTFALL

### 4.1 Affordable Housing Need and Past Supply

#### *North Somerset*

- 4.1.1 The affordable housing need summarised in section 3.4 above over the 2009/10 to 2022/23 period can be compared to the additional affordable housing supply across the district during this period.
- 4.1.2 The affordable housing supply assumptions draw on additional affordable housing completions data from the Ministry of Housing, Communities & Local Government<sup>20</sup> (“MHCLG”)<sup>21</sup> and Private Registered Provider Social Housing Stock in England: Statistical Data Returns (“SDR”) data on affordable housing stock held in North Somerset<sup>22</sup> (thus enabling net increases / decreases in affordable housing stock to be calculated) (see **Appendix 4**).
- 4.1.3 This process suggests a shortfall amounting to 10,752 affordable homes has accrued against the SHMA09 net annual need for affordable housing over the 2009/10 to 2022/23 period:

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<sup>20</sup> Previously the Department for Levelling Up, Housing and Communities

<sup>21</sup> For the 2009/10 to 2011/12 period – this may be a gross additional position but is the only data available for this period – Live Table 1008c

<sup>22</sup> Enabling net additions to be calculated for the 2012/13 to 2022/23 period for which data is so far available

**Figure 4.1.1 - North Somerset Affordable Housing Shortfall 2009/10 – 2022/23**

Year	Annual Affordable Housing Need	Affordable Housing Supply (Net)	Surplus / Shortfall**
2009/10	904	239	-665
2010/11	904	112	-792
2011/12	904	41	-863
2012/13	904	137	-767
2013/14	904	86	-818
2014/15	904	184	-720
2015/16	904	25	-879
2016/17	904	151	-753
2017/18	904	159	-745
2018/19	904	-450	-1,354
2019/20	904	534	-370
2020/21	904	96	-808
2021/22*	904	222	-682
2022/23*	904	368	-536
<b>TOTAL</b>	<b>12,656</b>	<b>1,904</b>	<b>-10,752</b>

Source: SHMA09, MHCLG Live Table 1008c (2009/10 to 2011/12) and Private Registered Provider Social Housing Stock in England: Statistical Data Returns 2012/13 to 2022/23 \*assumes SHMA09 affordable housing net annual need continues as assessed in the SHMA09 for the 2009/10 to 2020/21 period. \*\* a minus indicates a shortfall

#### Yatton Parish

- 4.1.4 As at a Parish level, the affordable housing need summarised in section 3.4 above during the 2009/10 to 2022/23 period can be compared to the additional affordable housing supply across the Parish during this period.
- 4.1.5 The Council (see **Appendix 2**) have provided affordable housing supply data for the 2018/19 to 2023/24 period suggesting a total supply of 150 units, of which 75 were provided in the three years 2018/19 to 2020/21.
- 4.1.6 **However, these are gross figures which do not reflect dwellings which change tenure because of Right to Buy sales to tenants.** In that respect, 2011 and 2021 Census data suggests a net additional 69 Affordable Homes have been provided in Yatton Parish<sup>23</sup> over the 10 year period

<sup>23</sup> Based on best fit LSOAs

2011 to 2021<sup>24</sup> – six dwellings less than the Council have reported for the three years 2018/19 to 2020/21. Furthermore, 2001 and 2011 Census data suggests a reduction of 9 affordable homes across the Parish over the 2001 to 2011 ten-year period (or 0.9 homes per annum).

4.1.7 The following table therefore reflects a loss of one Affordable Home per annum 2009/10 to 2010/11 and nil completions in the years 2011/12 to 2017/18, given that Council completions data suggests all net additional provision is likely to only have occurred 2018/19 to 2023/24:

**Figure 4.1.2 – Yatton Parish Affordable Housing Shortfall 2009/10 – 2023/24**

Year	Annual Affordable housing Need	Affordable housing Supply (Net)	Surplus / Shortfall**
2009/10	34	-1	-35
2010/11	34	-1	-35
2011/12	34	0	-34
2012/13	34	0	-34
2013/14	34	0	-34
2014/15	34	0	-34
2015/16	34	0	-34
2016/17	34	0	-34
2017/18	34	0	-34
2018/19	34	11	-23
2019/20	34	4	-30
2020/21	34	60	26
2021/22*	34	17	-17
2022/23*	34	19	-15
2023/24*	34	39	5
<b>TOTAL</b>	<b>510</b>	<b>148</b>	<b>-362</b>

Source: SHMA09 and Pioneer Analysis as summarised at Section 3.4, 2001, 2011 and 2021 Census data and completions data provided by North Somerset Council, July 2024 \*assumes SHMA09 affordable housing net annual need continues as assessed in the SHMA09 for the 2009/10 to 2020/21 period. \*\*a minus indicates a shortfall

<sup>24</sup> KS018 2001 Census and KS402EW 2011 Census for Yatton Parish and TS054 2021 Census based on best fit LSOAs



## 4.2 Affordable Housing Need and Planned Supply

- 4.2.1 The Council's housing evidence base does not include information specifically on a committed 'deliverable' supply of affordable housing. The Yatton LHNA reviewed potential sources of future affordable housing supply based on the overall housing supply reported in the 'Strategic Housing Land Availability Assessment' (November 2023 – "SHLAA" – **H15**), the 'Spatial Strategy and Capacity Paper (November 2023 – "SSCP" – **G7**) and through a review of emerging Local Policy (based on draft allocations and windfall assumptions).
- 4.2.2 The latter is not adopted, and the draft allocations cannot yet be considered a 'deliverable' supply of housing. The Yatton LHNA seeks to provide a view on the additional affordable housing that would be needed even if the emerging Local Plan is adopted as suggested.
- 4.2.3 However, when assessing the weight that should be attached to the supply of additional affordable housing through the Appeal proposals this should be in the context of the assessed need for affordable housing across the district and in Yatton against the deliverable supply of affordable housing assessed to be present at the time. This is because only limited weight can be attached to the emerging allocations and planned housing land supply given that it is yet to be independently examined.
- 4.2.4 Similarly, the SHLAA, whilst providing an assessment of potential residential development land in Yatton and across the district and of past windfall supply, does not provide a view on deliverable housing supply through planning permissions and / or adopted Local Plan allocations.
- 4.2.5 As noted in the Yatton LHNA,<sup>25</sup> the table at paragraph 7.1 of the SSCP identifies a deliverable supply of 207 dwellings (of all tenures) along with a 90 windfall dwellings (of all tenures) over a 15-year emerging Plan period. Across the district 6,656 residential commitments / existing permissions (of all tenures) are identified in the SSCP.
- 4.2.6 Affordable housing evidence submitted to the 'Land at Farleigh Farm and 54 and 56 Farleigh Road, Backwell, North Somerset' Planning Appeal (**H23**) dated February 2022<sup>26</sup> provided an updated position on the planned supply of affordable housing.

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<sup>25</sup> Paragraph 4.3.5, Yatton LHNA

<sup>26</sup> In respect of APP/D0121/W/21/3285624 (I12)

- 4.2.7 As of February 2022 this evidence<sup>27</sup> concluded a deliverable supply of 867 affordable homes (175 homes per annum) across North Somerset during a five-year 2021/22 to 2025/26 period, of which 60 are identified as falling within Yatton Parish<sup>28</sup> (i.e. c.12 per annum).
- 4.2.8 This assessment is described as based on a detailed analysis of the overall deliverable housing supply in the district and the estimated number of affordable homes that would be delivered as a result.<sup>29</sup>
- 4.2.9 The Inspector referred to a supply of 171 affordable homes per annum 2021-26 (855 over five years) falling 'short of the need identified by the LHNA' for North Somerset.<sup>30</sup> The Inspector's report set out that the Appellant concluded a supply of 4501 homes overall (3.1 years), whilst the Inspector concluded a 5,181 overall housing land supply (3.5yrs).
- 4.2.10 Assuming the Inspector's concluded annual rate of deliverable affordable housing supply continues to apply across the district over the next five years - i.e. 171 net affordable homes per annum - the following affordable housing shortfalls are calculated against the affordable housing need across North Somerset established in Section 3 above:

**Figure 4.2.1 - North Somerset Affordable Housing Shortfall 2023/24 – 2028/29**

Year	Annual Affordable housing Need		Affordable housing Supply (Net)	Surplus / Shortfall**	
2023/24	904		171	-733	
	Constrained 'Policy-on'	All Eligible Households		Constrained 'Policy-on'	All Eligible Households
2024/25	376	to 861	171	-205	to -690
2025/26	376	to 861	171	-205	to -690
2026/27	376	to 861	171	-205	to -690
2027/28	376	to 861	171	-205	to -690
2028/29	376	to 861	171	-205	to -690
<b>TOTAL</b>	<b>2784</b>	<b>to 5209</b>	<b>1,026</b>	<b>-1758</b>	<b>to -4183</b>

Source: Affordable housing need: SHMA09 for 2023/24, LHNA23 and updated affordable housing vacancy rates for 2024/25 to 2028/29 – see Affordable housing need summary in section 3.5 above, Affordable housing supply: See paragraphs in Section 4.2 of this Proof of Evidence. \*\* a minus indicates a shortfall

<sup>27</sup> Affordable housing Proof of Evidence 'Land at Farleigh Farm and 54 and 56 Farleigh Road, Backwell, North Somerset' (APP/D0121/W/21/3285624) paragraph 6.38 and Appendix JS5 (H23)

<sup>28</sup> as well as £240k as a commuted sum

<sup>29</sup> Affordable housing Proof of Evidence 'Land at Farleigh Farm and 54 and 56 Farleigh Road, Backwell, North Somerset' (APP/D0121/W/21/3285624) paragraph 6.37 (H23)

<sup>30</sup> Land at Farleigh Farm and 54 and 56 Farleigh Road, Backwell, BS48 3PD - Appeal Reference APP/D0121/W/21/3285624, Inspector's Report 22<sup>nd</sup> June 2022 - Paragraph 105, Inspector's report

4.2.11 Across Yatton Parish since the Farleigh work was undertaken, there have been c.68 new affordable housing approvals. Meanwhile some of the approvals within the Farleigh evidence may have been delivered and fallen out of the future supply calculation, but they will still need to be factored into the past need / supply comparison in 4.1 above.

4.2.12 However, assuming the Farleigh evidence affordable housing units are still within the current 5yr period this now gives a total of 128 affordable housing approvals / deliverable supply – 25.6 per annum. This supply is factored into the future need / deliverable supply analysis for Yatton in the Table below:

**Figure 4.2.2 – Yatton Parish Affordable housing Shortfall 2024/25 – 2028/29**

Year	Annual Affordable Housing Need		Affordable Housing Supply (Net)	Surplus / Shortfall*	
	Constrained 'Policy-on'	All Eligible Households		Constrained 'Policy-on'	All Eligible Households
2024/25	14	to 55	25.6	11.6	to -29.4
2025/26	14	to 55	25.6	11.6	to -29.4
2026/27	14	to 55	25.6	11.6	to -29.4
2027/28	14	to 55	25.6	11.6	to -29.4
2028/29	14	to 55	25.6	11.6	to -29.4
<b>TOTAL</b>	<b>70</b>	<b>to 275</b>	<b>128</b>	<b>58</b>	<b>to -147</b>

Source: Affordable housing need: LHNA23 (H6) and Pioneer analysis for 2024/25 to 2028/29 – see Affordable housing need summary in section 3.5 above, Affordable housing supply: See paragraphs in Section 4.2 of this Proof of Evidence. \*a minus indicates a shortfall

4.2.13 While the estimated planned supply may meet future affordable housing need at the lower, constrained, end of the range in Yatton, Section 4.3 below demonstrates that where past need and future need / supply are brought together, there remains an overall shortfall.

### 4.3 Affordable Housing Shortfall Summary

4.3.1 Taking account of the assessed past and future need for affordable housing and the past and planned levels of supply of affordable housing the following overall affordable housing shortfalls are suggested to accrue by 2028/29 in North Somerset and Yatton Parish unless an additional supply is identified:

**Figure 4.3.1 - North Somerset Affordable Housing Shortfall 2009/10 – 2028/29**

Period	Affordable Housing Need	Affordable Housing Supply (Net)	Surplus / Shortfall**
2009/10 to 2028/29	15,440 to 17,865	2,930	-12,510 to -14,935

Source: Affordable housing Need and Supply analysis summarised in Sections 4.1 and 4.2 of this Proof of Evidence \*\* a minus indicates a shortfall

**Figure 4.3.2 – Yatton Parish Affordable Housing Shortfall 2009/10 – 2028/29**

Period	Affordable housing Need	Affordable housing Supply (Net)	Surplus / Shortfall*
2009/10 to 2028/29	580 to 785	276	-304 to -509

Source: Affordable housing need and supply analysis summarised in Sections 4.1 and 4.2 of this Proof of Evidence \*a minus indicates a shortfall

4.3.2 Based on housing needs analysis in the Yatton LHNA and past / planned supply, unless a significant additional net deliverable supply of affordable housing is identified across North Somerset and in Yatton Parish over the next five years an **affordable housing shortfall will continue to accrue to 12.5k to 14.9k homes across North Somerset and 304 to 509 homes across Yatton Parish by 2028/29.**

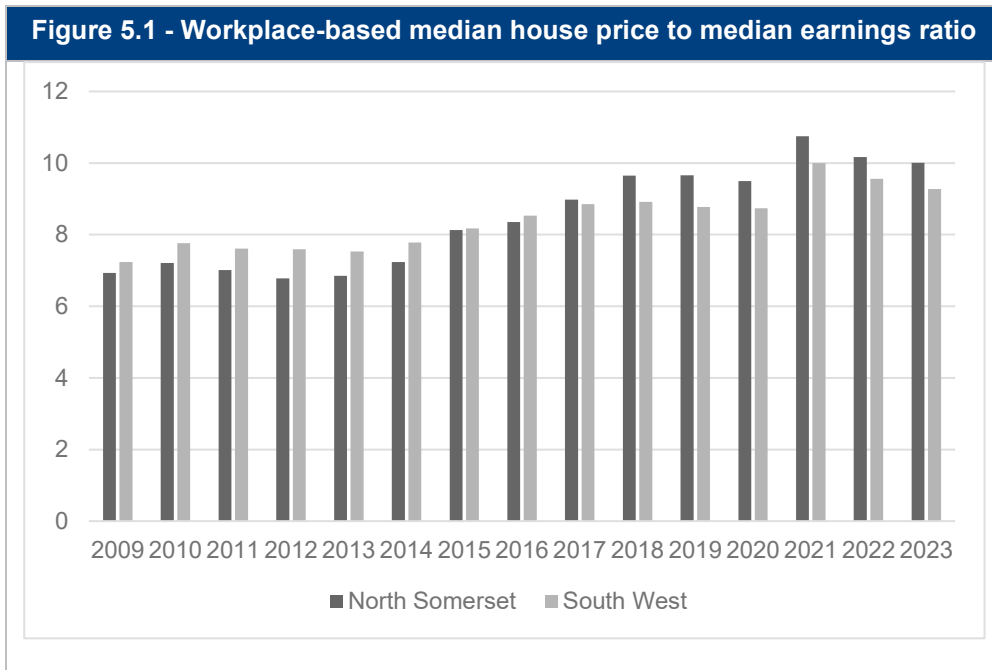
4.3.3 As well as the new committed affordable housing supply already factored into the above calculations, there will be a supply of re-lets / re-sales of Affordable Housing, data provided by the Council for the three years 2021 to 2023 suggests these will average c.12 affordable homes per annum if past trends continue (i.e. amounting to c.60 affordable homes over

2024/25 to 2028/29). This will be insufficient to address the significant backlogs in unmet Affordable Housing need likely to accrue across the Parish by 2028/29.

- 4.3.4 The appeal site, which will provide 50% of the homes proposed as affordable housing (20% more than sought in adopted Core Strategy policy), will assist with addressing unmet Affordable Housing need.

## 5 AFFORDABILITY INDICATORS

5.1 Median house price to workplace earnings ratios are identified by national guidance as a measure of affordability:



Source: Office for National Statistics Crown copyright 2024

- 5.2 Data published by the Office for National Statistics (“ONS” – see **Appendix 3**) suggests that the ratio of median house price to workplace based earnings across the district has increased from 6.93 in 2009 to 10.01 in 2023.<sup>31</sup> Affordability is suggested to be worse than it is across the South West as a whole (the latter has a ratio of 9.27 as at 2023).
- 5.3 Trends in house price to income ratios provide a significant indicator of housing affordability pressures over time. The increasing affordability pressures in the district since 2009 suggest that affordable housing need (and the backlog of unmet need) is very unlikely to have diminished in the local authority area. The data suggests that households are increasingly unlikely to be able to afford to resolve their housing needs in the private sector.
- 5.4 It is currently unclear how house prices will fare over the medium term but given ongoing cost of living pressures, affordability is unlikely to improve in real terms.

<sup>31</sup> Most recent period available as at August 2024

Private Rent

- 5.5 The LHNA23 suggests that it is reasonable to assume that households spend 35% of their household income on housing costs.<sup>32</sup>
- 5.6 Private Rental Market Statistics data is published by the ONS and provides a ‘Summary of monthly rents recorded between 1 October 2022 to 30 September 2023 by administrative area for England’:

**Figure 5.2 - Private Rental Market Statistics Extract – North Somerset 2022-2023**

LA Code <sup>1</sup> Area Code <sup>1</sup> Area			All categories				
			Count of rents	Mean	Lower quartile	Median	Upper quartile
NA	E92000001	ENGLAND	459,340	994	650	850	1,200
0121	E06000024	North Somerset UA	1,930	970	750	900	1,150

Source: Private Rental Market Statistics Table 2.7, ‘Summary of monthly rents recorded between 1 October 2022 to 30 September 2023 by administrative area for England’, ONS

- 5.7 The above data suggests that, assuming households costs equate to 35% of the household income, an annual household income of c.£26k per annum would be required to afford a lower quartile rent of c.£173 per week in North Somerset. This is equivalent to a median market rent reported in the LHNA23 for a one bedroom property in North Somerset.<sup>33</sup>
- 5.8 Figure 43 in the LHNA23 suggests that c.34% of households<sup>34</sup> in need of housing in North Somerset 2024 to 2039 will be unable to afford market rents. This suggests that some of the lowest income households, despite not being prioritised for affordable housing, may struggle to source suitable homes that they can afford in the private rented sector across the region.
- 5.9 **Affordability pressures look set to remain high across North Somerset and where demand for private rented housing outstrips supply households unlikely to meet ‘waiting list qualifying criteria’ and unable to afford open market housing for sale will be prevented from accessing the homes they need.**

<sup>32</sup> Paragraph 3.34, LHNA23 (H6)

<sup>33</sup> Paragraph 3.35, LHNA23 (H6)

<sup>34</sup> 4,058 out of 12,038 households

## 6 THE WEIGHT TO BE ATTACHED TO AFFORDABLE HOUSING

### 6.1 National Housing Crisis

6.1.1 Nationally, we remain amid a national housing crisis. The Government target for the provision of 300,000 new homes per annum (of all tenures) in England has been in place for several years<sup>35</sup> and was reconfirmed within the ‘Levelling-up and Regeneration Bill: reforms to national planning policy’ which accompanied the draft NPPF consultation and stated that:

*“The government remains committed to delivering 300,000 homes a year by the mid-2020s...”*

(paragraph 6, Levelling-up and Regeneration Bill: reforms to national planning policy Consultation, December 2023 – **M5**)

6.1.2 The same paper also places an emphasis on the need to provide both affordable housing for owner occupation and for rent.<sup>36</sup>

6.1.3 The new Labour administration has confirmed an objective for this national target to be maintained (‘with 1.5 million new homes over the next parliament’) or at least increased (with a new Standard Method setting targets that will collectively seek 370,000 homes per annum nationally), and has further proposed that housing delivery targets for local authorities will be made mandatory and planning reforms will speed up housing and infrastructure delivery.<sup>37</sup>

6.1.4 This re-confirms the accepted importance of significantly increasing overall housing supply. However, given the shortfalls in supply that have already accrued against the longstanding existing 300k annual housing delivery target, even provision on an increased 370k annual scale will be insufficient.

6.1.5 Research published in February 2024 by the Centre for Economics and Business Research (“CEBR”) for Shelter and the National Housing Federation entitled ‘The economic impact of building social housing’ (“CEBR report” – **H24**) sets out that:

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<sup>35</sup> 2017 Autumn Budget **M4** – 300,000 target set by Chancellor

<sup>36</sup> ‘Levelling-up and Regeneration Bill: reforms to national planning policy’, paragraphs 2 – 4, Chapter 5

<sup>37</sup> Change Labour Party Manifesto 2024 and Angela Rayner Speech at Labour Party Conference, 8<sup>th</sup> Oct 2023 (**M6**) – these proposals are now set out in the ‘Open consultation; Proposed reforms to the National Planning Policy Framework and other changes to the planning system’ (“Planning Reform Consultation” - 2<sup>nd</sup> of August 2024 – **M1**).



*“It is widely acknowledged within the housing sector that there is a need to build a minimum of 90,000 social rented homes a year, over a span of ten years, in England. This commitment is considered crucial for clearing social housing waitlists and effectively combatting homelessness.”*

(page 5, CEBR report)

6.1.6 **The CEBR report concludes that funding a programme to deliver this affordable housing would result in:**

- ‘direct annual savings of £243.8 million to the Exchequer in housing benefits’
- ‘increased economic activity in the construction sector is projected to yield £2.5 billion in tax revenue’, and,
- ‘Over 30 years, the net impact for the Exchequer of funding 90,000 social homes is expected to be positive, with a net benefit of £11.9 billion’.

6.1.7 Since the 300,000 overall housing delivery annual target was announced by the Chancellor in the 2017 Autumn Budget, significantly less than 300,000 net additional homes have been built in each subsequent year. In April 2024 the Church of England with the Nationwide Foundation published ‘Homes for All: A Vision for England’s Housing System’ (“HFA” – **H25** - providing a potential thirty year ‘Housing Strategy’ and suggesting targets for government to aspire to during an initial five-year period). The HFA states that:

*“There is broad consensus that England needs a minimum of 300,000 additional homes per year, but during the period 2018-2022, only 842,980 homes were completed. This implies a backlog of 657,020, which means the number of homes we need to build each year is now even greater.”*

(page 14, HFA)

6.1.8 Using the same data source as the HFA,<sup>38</sup> taking account of the completions data for 2024 suggests that the situation has worsened; a total of 1,002,270 completions 2018 to 2023 (see **Appendix 3**) compared to a target requirement for 300,000 homes per annum suggests there is now a 797,730 shortfall.

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<sup>38</sup> Live Table 244, House building: permanent dwellings started and completed, by tenure, England, Historical Calendar Year Series

6.1.9 Whilst a review of overall net additions to the housing stock based on Live Table 120<sup>39</sup> (which takes account of completions through permitted development rights, net conversions, net changes of use and net other gains and demolitions and Census adjustments as opposed to simply gross new build completions – see Appendix 3) suggests a lower shortfall, it is still in the region of 389,000 homes over the 2017/18 to 2022/23 six-year period.<sup>40</sup>

6.1.10 In addition to its observations on overall housing supply the HFA also reports:<sup>41</sup>

- there to be 1.2 million households on local authority social housing waiting lists,
- that there were ‘a minimum of 271,000 people recorded as homeless in England on any given night in 2022 and 131,000 children in temporary accommodation in 2023’.
- that ‘England’s house prices have risen 377% in 30 years, while average disposable income in the UK has risen 51%’, and that,
- social housing delivery is only just keeping ahead of sales and demolitions.

6.1.11 Specifically in respect of affordable housing the 90k per annum requirement for Social Rented homes referred to in the CEBR is based on a 2019 Bramley study (H26)<sup>42</sup> prepared for Crisis and the National Housing Federation which concludes that:

*“There is a current backlog of households with housing need of 3.91million households in Great Britain with 3.37m in England. Adding in various core and wider homeless people not within private households, and private renters with affordability problems would bring the total up to 4.75 million across Britain.”*

(Chapter 8, Housing supply requirements across Great Britain for low-income households and homeless people)

6.1.12 The report concludes that a 340k annual level of housebuilding (across all tenures) is needed over a 15-year timeframe, with an annual target level of 90k ‘social housing’ homes and a

<sup>39</sup> ‘Components of net housing supply, England, 2006-07 to 2022-23, unrounded’

<sup>40</sup>Target for 2017/18 to 2022/23 6yr period (300k x 6 years) = 1,800,00 minus net additions 2017/18 to 2022/23 (1,411,140) = 388,859

<sup>41</sup> Pages 5 and 14, HFA

<sup>42</sup> Housing supply requirements across Great Britain for low-income households and homeless people: Research for Crisis and the National Housing Federation; Main Technical Report, Bramley, G (2019)

further 60k homes for Affordable Home Ownership and 'intermediate affordable rent'<sup>43</sup> – this equates to 150k Affordable Homes per annum.

- 6.1.13 Live Table 1000c (see **Appendix 3**) suggests that there have been 338,729 affordable housing completions 2017/18 to 2022/23 (6 years) across England – this equates to 56.5k per annum. Compared to a suggested annual need for 150k affordable homes (a total of 900k 2017/18 to 2022/23) this suggests a shortfall in affordable housing provision across England of 561k homes.
- 6.1.14 These points highlight the pressing need for more homes and more affordable housing across the Country and support that very substantial weight should be applied to affordable housing proposals that assist with addressing this need.

## 6.2 Secretary of State and Appeal Decisions of Relevance

- 6.2.1 There are numerous appeal decisions which have continued to highlight the accepted importance of overall housing delivery, affordable housing delivery and the need to widen housing choice and improve affordability across the housing market. The decisions emphasise the very significant / substantial weight which the Secretary of State and Planning Appeal Inspectors have, on numerous occasions, attached to proposals for the provision of affordable housing when determining planning applications.

### **Rectory Farm, Kings Langley, Hertfordshire, Dacorum, WD4 8HG, Appeal Reference APP/A1910/W/23/3333545, Inspector's Report 9th May 2024 (I14)**

- 6.2.2 The local authority in this Planning Appeal is described as having 'a systemic and acute housing shortfall'<sup>44</sup> and the Inspector reported that:

*"In my view the delivery of 135 dwellings, 54 of which would be affordable, in an area where there is a chronic under supply of housing and staggering levels of affordability, is the weightiest consideration in the planning balance. I attach **very substantial weight** to these benefits."*

(paragraph 96, Inspector's report – emphasis added)

<sup>43</sup> Chapter 8, Housing supply requirements across Great Britain for low-income households and homeless people: Research for Crisis and the National Housing Federation; Main Technical Report, Bramley, G (2019)

<sup>44</sup> paragraph 31, Inspector's report

**Land south of Burford Road, Minster Lovell, Oxfordshire, Appeal Reference APP/D3125/W/23/3331279, Inspector’s Report 28th March 2024 (I15)**

6.2.3 The Inspector concluded that the Council could not demonstrate a Housing Land Supply<sup>45</sup> when considering proposals for development on this site and that:

*“The appeal proposal would deliver a significant amount of much needed housing, making an important contribution to housing supply in the District and Witney sub-area. It would boost the supply in the short term and assist in meeting housing requirements for the Local Plan period. The housing would include 40% affordable housing and 5% custom/self-build. I attach **substantial weight** to these benefits.”*

(paragraph 76, Inspector’s report – emphasis added)

**Land lying to the east of Hartfield Avenue and fronting on to Barnet Lane, Elstree, Hertfordshire, Appeal Reference APP/N1920/W/23/3329947, Inspector’s Report 25th March 2024 (I16)**

6.2.4 The Inspector concluded the Council to have a Housing Land Supply shortfall<sup>46</sup> when considering proposals for development on this site within the Green Belt and on affordable housing concluded:

*“...the anticipation of up to 33 affordable units being delivered within the five-year period also merits **very substantial weight**.”*

(paragraph 133, Inspector’s report – emphasis added)

**Appeals A. Land South Of Chiswell Green Lane, Chiswell Green, St. Albans & B. Land North Of Chiswell Green Lane, Chiswell Green, St. Albans, Appeal References A. APP/B1930/W/22/3313110 & B. APP/B1930/W/22/3312277, Inspector’s Report 24<sup>th</sup> October 2023, Secretary of State Letter 22<sup>nd</sup> March 2024 (I17)**

6.2.5 The local authority, unable to demonstrate a 5-year housing land supply, is noted by the Secretary of State to have failed the Housing Delivery Test ‘by some margin’ and:

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<sup>45</sup> Paragraph 27, Inspector’s report

<sup>46</sup> Paragraph 114, Inspector’s report

*“...the Secretary of State agrees with the Inspector that in the context of such a great housing need, **very substantial weight** should be attached to the proposed housing.”*

(paragraph 29, Secretary of State Letter – emphasis added)

Thus, the Secretary of State allowed the appeals for these sites within the Greenbelt.

**Land To The West Of Moreton Road And Castlemilk, Moreton Road, Buckingham, Buckinghamshire, Appeal Reference APP/J0405/V/23/3322305, Inspector’s Report 4<sup>th</sup> December 2023, Secretary of State Letter 1<sup>st</sup> March 2024 (I18)**

- 6.2.6 The Secretary of State concluded there to be less than a 5-year housing land supply and that in terms of the affordable housing for this Greenfield site:

*“...as affordable housing provision of 35% would materially exceed the minimum requirement of the LP, 25%, this provision carries **significant weight**”*

(paragraphs 39 and 40, Secretary of State Letter – emphasis added)

**Land south of Badminton Road, Old Sodbury, South Gloucestershire - Appeal Reference APP/P0119/W/22/3303905, Inspector’s Report 6<sup>th</sup> January 2023 (I19)**

- 6.2.7 In this appeal the Inspector allowed a 35-dwelling proposal despite noting that the local authority could potentially have a housing land supply of up to 5.64 years:

*“However, regardless of which figure is taken, I consider the affordable housing carries **significant positive weight** despite its modest number due to the serious and significant shortfall that has not been addressed in previous plan period years.”*

(paragraph 42, Inspector’s Report – emphasis added)

The 5-year target was noted to be a minimum not a maximum number.<sup>47</sup>

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<sup>47</sup> Paragraph 42, Inspector’s report

**Site To The West Of The A1237 And South Of North Lane, Huntington, York - Appeal References APP/C2741/W/21/3282969, Inspector’s Report 17<sup>th</sup> March 2022, Secretary of State Letter 14<sup>th</sup> December 2022 (I20)**

6.2.8 The Secretary of State allowed an appeal for the provision of 970 dwellings in the Green Belt in Huntingdon, York and in so doing agreed with the Planning Inspector:

*“...that delivery of 30% affordable housing would be a further social and economic benefit to which **significant weight** should be attached.”*

(paragraph 29, Secretary of State Letter – emphasis added)

In this case the level of affordable housing proposed was in accordance with policy.

**Land to the West of Clyst Road, Topsham, Appeal Reference APP/Y1110/W/22/3296946, Inspector’s Report 11<sup>th</sup> October 2022 (I21)**

6.2.9 The reporting Inspector noted there to be a housing land supply shortfall, the NPPF objective to significantly boost housing supply and the ‘significant under delivery of affordable housing in the past’ meaning that:

*“...the need is now acute. Therefore, I also attribute **substantial weight** to the scheme’s affordable housing contribution.”*

(paragraph 46, Inspector’s Report – emphasis added)

**Land at Farleigh Farm and 54 and 56 Farleigh Road, Backwell, BS48 3PD - Appeal Reference APP/D0121/W/21/3285624, Inspector’s Report 22<sup>nd</sup> June 2022 (I12)**

6.2.10 In this North Somerset Planning Appeal relating to proposals for up to 125 dwellings on a Greenfield site the Inspector reported a 3.5-year housing land supply (as at June 2022) and described it as ‘a very significant shortfall in housing land supply’.<sup>48</sup> In respect of affordable housing the Inspector stated that 128 affordable homes have been delivered per annum over 15 years and this has ‘fallen significantly short of meeting affordable housing needs’.<sup>49</sup>

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<sup>48</sup> Paragraph 90, Inspector’s report

<sup>49</sup> Paragraph 104, Inspector’s report

6.2.11 In terms of future supply the Inspector referred to a supply of 171 affordable homes per annum 2021-26 falling 'short of the need identified by the LHNA' for North Somerset.<sup>50</sup>

6.2.12 The Inspector stated that:

*“Bearing in mind the importance that the Framework attaches to meeting the needs of groups with specific housing requirements, the provision of 30% affordable homes, is a benefit attracting **significant weight** in my decision.”*

(paragraph 105, Inspector’s report – emphasis added)

The Inspector went on to ‘give **very significant weight** to the provision of market and affordable housing...’<sup>51</sup> (emphasis added) when considering the planning balance in paragraph 146 of their report.

**Rectory Farm, Chescombe Road, Yatton, Bristol BS49 4EU - Appeal Reference APP/D0121/W/21/3286677, Inspector’s Report 15<sup>th</sup> June 2022 (I11)**

6.2.13 This planning appeal relates to a site within Yatton, North Somerset and so is of particular relevance to this inquiry. The proposal, for 100 dwellings including 30% affordable housing, was allowed at appeal with the Inspector reporting:

*“With regard to the delivery of **market housing**, it is clear to me that the Council has a very poor record of housing delivery and has consistently failed to demonstrate a 5YHLS. The shortfall is significant and should be given **very significant weight**. As I perceive it, the Council is not taking any urgent or effective action to address this, and a review of the housing requirement and Local Plan as a whole is now overdue and is unlikely to be completed for the foreseeable future. From the evidence that is before me it is unlikely that the shortfall would be made up quickly.”*

(paragraph 145, Inspector’s report – Inspector’s own emphasis)

The Inspector noted that the Council’s Expert Witness ‘agreed that **very significant weight** should apply’ to the provision of market housing where there is no 5-year housing land supply

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<sup>50</sup> Paragraph 105, Inspector’s report

<sup>51</sup> Paragraph 146, Inspector’s report

and ‘agreed that **very significant weight** should apply’ to the 30% provision of affordable housing regardless of the housing land supply position.<sup>52</sup>

**Land at Moor Road, Yatton, North Somerset - Appeal Reference APP/D0121/W/21/3285343, Inspector’s Report 27<sup>th</sup> April 2022 (I9)**

6.2.14 This North Somerset appeal was allowed with 18 affordable homes and the Inspector concluded in their report at paragraph 88 that this provision should attract ‘**significant weight**’.

**Roundhouse Farm, Land Off Bullens Green Lane, Colney Heath - Appeal References APP/B1930/W/20/3265925 and APP/C1950/W/20/3265926, Inspector’s Report 14<sup>th</sup> June 2021 – (I22)**

6.2.15 The reporting Inspector in this St Albans District Planning Appeal stated that:

*“The persistent under delivery of affordable housing in both local authority areas presents a critical situation. Taking into account the extremely acute affordable housing position in both SADC and WHBC, I attach **very substantial weight** to the delivery of up to 45 affordable homes in this location in favour of the proposals.”*

(paragraph 54, Inspector’s Report – emphasis added)

**Land At Citroen Site, Capital Interchange Way, Brentford, Secretary of State Letter 10<sup>th</sup> September 2020 and Inspector’s Report 11<sup>th</sup> June 2020, Appeal Reference: APP/G6100/V/19/3226914 (I23)**

6.2.16 Despite a five-year housing land supply being applicable to the London Borough of Hounslow, considering the ‘acute housing shortage across London’ and ‘the Inspector’s conclusions on affordable housing’

*“...the Secretary of State considers that overall, the benefits of housing should be given **substantial weight**.”*

(paragraph 21, Secretary of State Letter – emphasis added)

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<sup>52</sup> Paragraphs 146 and 147, Inspector’s report



6.2.17 The same sentiment is repeated at paragraph 30 of the Secretary of State’s letter and on the basis that the Inspector’s report stated that the affordable housing ‘is no more than would be policy compliant’.<sup>53</sup>

**Land at Hatchfield Farm, Fordham Road, Newmarket, Inspector’s Report 1<sup>st</sup> August 2019, Secretary of State Letter 12<sup>th</sup> March 2020, Appeal reference: APP/H3510/V/14/2222871 (I24)**

6.2.18 Even though a five-year housing land supply is demonstrated the Hatchfield Farm appeal decision confirms that affordable housing provision can be of ‘substantial weight’, with the Secretary of State letter stating that:

*“The Inspector confirmed that it is common ground between the parties that West Suffolk Council can demonstrate a five-year supply of deliverable housing sites (IR502). This scheme would deliver a substantial number of new dwellings, 30% of which would be affordable. For the reasons given at IR528 the Secretary of State agrees with the Inspector that there is no reason to depart from the position in the 2016 decision that the delivery of this housing would carry **substantial weight** in favour of the proposal.”*

(paragraph 14, Secretary of State Letter - – emphasis added)

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<sup>53</sup> Paragraph 15.60, page 114

## **7 SUMMARY AND CONCLUSION**

### *Policy Context*

- 7.1 That affordable housing is an important material consideration is evident from the fact that, for many years, its delivery has been prioritised within National Planning Policy. Paragraph 60 of the NPPF includes the clear objective of ‘significantly boosting the supply of homes’ and paragraph 61 confirms that the ‘minimum number of homes needed’ should be informed by a local housing need assessment. Paragraph 63 sets out that the need for different types, sizes and tenures of housing should be assessed and policy should reflect this, specifically in respect of affordable housing where a need for it is established.
- 7.2 Proposed reforms to national planning policy, anticipated to come into force in 2024 will place an increased emphasis on the weight to be attached to the benefit of affordable housing provision, with a commitment in the August 2024 Planning Reform Consultation document to ‘boost affordable housing’, ‘bring home ownership into reach’ and to ‘deliver more affordable, well-designed homes quickly’.
- 7.3 CS Policy CS16 ‘Affordable Housing’ targets the delivery of only 150 affordable homes per annum which equates to only c.14% of the overall 1,049 housing supply and falls significantly short of the level of affordable housing need identified within the SHMA09 and within the LHNA23 – albeit the latter assessment excludes significant numbers of households eligible for affordable housing for sale.
- 7.4 Emerging Local Plan Policy DP43 seeks 38.5% affordable housing on eligible Greenfield sites and 20% on eligible previously developed land in a 77% Social Rent and 23% Shared Ownership split where First Homes are not provided (in line with contemporaneous proposed national planning policy reform).
- 7.5 It has been, found at the Farleigh Farm Appeal (reported in February 2022), the Council can only demonstrate a 3.5 year housing land supply. As such, the opportunities to secure affordable housing are limited, particularly considering the wider strategic viability pressures suggested by the Council’s evidence base.

*Quantum of Unmet Affordable Housing Need*

- 7.6 Based on affordable housing needs analysis, unless a significant additional net deliverable supply of affordable housing is identified across North Somerset and in Yatton Parish over the next five years an **affordable housing shortfall will continue to accrue, accumulating to 12.5k to 14.9k homes across North Somerset and to 304 to 509 homes across Yatton Parish by 2028/29** – the lower end of this range excludes a significant number of households eligible for affordable housing under the NPPF affordable housing definition. The potential supply of re-lets / re-sales of Affordable Housing will be insufficient to address the significant backlogs in unmet Affordable Housing need likely to accrue across the Parish
- 7.7 The appeal site, which will provide 50% of the homes proposed as affordable housing (**20% more than sought in adopted Core Strategy policy**), will assist with addressing unmet Affordable Housing need.

*Affordability and Affordable Housing Tenure*

- 7.8 Office for National Statistics data suggests that the ratio of median house price to workplace based earnings across the district has increased from 6.93 in 2009 to 10.01 in 2023. Affordability is suggested to be worse than it is across the South West as a whole (the latter has a ratio of 9.27 as at 2023).
- 7.9 Figure 43 in the LHNA23 suggests that c.34% of households in need of housing in North Somerset during 2024 to 2039 will be unable to afford market rents.
- 7.10 Affordability pressures look set to remain high across North Somerset and where demand for private rented housing outstrips supply households unlikely to meet 'waiting list qualifying criteria' and unable to afford open market housing for sale will be prevented from accessing the homes they need.
- 7.11 Location specific 2021 Census data on the tenure of existing Affordable Housing stock in the Yatton LHNA suggests Yatton has low levels of AHO as a proportion of the overall affordable housing stock. Furthermore, the Yatton LHNA suggests affordability within Yatton to be more challenging than across North Somerset. AHO supply and affordability pressures in Yatton (and across North Somerset) and the district wide 'unconstrained' need for c.68% of affordable housing for AHO based on the LHNA23 suggest that Yatton Parish will benefit significantly from the provision of additional AHO at the levels proposed.

*The Weight to be Attached to the Affordable housing Proposals*

- 7.12 Nationally, we remain in the middle of a national housing crisis. A review of overall net additions to the housing stock based on Government data suggests a national shortfall in the region of 389,000 homes over the 2017/18 to 2022/23 six-year period.
- 7.13 The 'Homes for All: A Vision for England's Housing System' paper reported in April 2024:
- 1.2 million households on local authority social housing waiting lists
  - a minimum of 271,000 people recorded as homeless in England on any given night in 2022
  - 131,000 children in temporary accommodation in 2023
  - a 377% rise in house prices in England in 30 years compared to a 51% increase in average disposable incomes in the UK
- 7.14 Research commissioned by Crisis and the National Housing Federation states that there is 'a backlog of housing need of 4.75 million households across Great Britain (4 million in England)' and concludes nearer c.340,000 homes (of all tenures) need to be built annually in England if a 'meaningful levelling of affordability differences' is to be achieved.
- 7.15 Secretary of State and appeal decisions confirm that affordable housing is an important material consideration, that the need to address affordable housing requirements is acute and urgent, and that the Secretary of State has routinely attached 'significant weight' and 'substantial weight' to the provision of affordable housing. Even when a five-year housing land supply exists, when Plans are up to date, when affordable housing proposals do not exceed or are below policy requirements and when on Greenbelt land, the material benefits of affordable housing proposals have still been concluded to weigh substantially in favour of development proposals.
- 7.16 The prioritisation of the provision of additional affordable housing in the district is a primary objective within Development Plan policy.
- 7.17 The need for additional affordable housing in North Somerset remains acute. It is in the context of this ongoing significant, unmet affordable housing need, and that:

- the council does not have an NPPF compliant Housing Land Supply,
- the proposals will deliver 50% affordable housing which is in excess of the 30% policy requirement, in a tenure split that will assist with addressing affordable housing need in Yatton Parish and across the district, and,
- the outlook in terms of the Council providing enough affordable housing to address existing and future need remains bleak,

that the weight to be attached to the benefit of the additional affordable housing proposed in this Planning Appeal should be considered.

7.18 It is therefore concluded that **very substantial weight** should be attached to the proposed delivery of affordable housing on the Appeal Site. This reflects the approach taken in numerous Inspector and Secretary of State decisions where there are persistent Housing Land Supply shortfalls and shortfalls in the provision of affordable housing to meet the identified housing need.

Appendix 1 –

**SHMA09 Top-Down Analysis**

<b>Annual Affordable Housing Need based on the SHMA09 (2009 – 2021)</b>				
<b>Location</b>	<b>Tenure</b>	<b>2011 Census Total Population</b>	<b>Rate of Affordable Housing Need per Person</b>	<b>Affordable Housing Need Per Annum</b>
<b>North Somerset</b>	Rented Affordable Housing	202,566	0.003628447	735
	Intermediate / Affordable Home Ownership Housing		0.000834296	169
	TOTAL Affordable Housing Need		0.004462743	904
<b>Yatton Parish</b>	Rented Affordable Housing	7,552	0.003628447	27
	Intermediate / Affordable Home Ownership Housing		0.000834296	6
	TOTAL Affordable Housing Need		0.004462743	34

**Appendix 2 –**

**Housing Waiting List / Supply Data, North Somerset Council, 15<sup>th</sup> July 2024**

**Date:** 15/07/2024  
**My ref:** Corresp28Nov23  
**Contact:** Kevin Stamper  
**Email:** Kevin.stamper@n-somerset.gov.uk



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

Dear Zoe

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

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

Area of Preference	Property Type								Total
	Family			Non-Family			Sheltered		
	2	3	4+	1	2	3+	1	2	
<b>Whole Register</b>	625	301	138	851	162	23	478	38	<b>2616</b>
<b>Backwell</b>	190	97	51	374	57	8	143	9	<b>929</b>
<b>Clevedon</b>	229	116	52	421	71	9	174	11	<b>1083</b>
<b>Nailsea</b>	188	106	41	369	57	9	159	9	<b>938</b>
<b>Portishead</b>	221	114	40	399	66	8	177	14	<b>1039</b>
<b>Weston-Super-Mare</b>	407	187	91	598	107	17	270	25	<b>1691</b>
<b>Yatton</b>	208	115	51	376	58	7	153	8	<b>976</b>
<b>Nb. Applicants can select multiple areas of preference, and do not indicate a "first choice".</b>									

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

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



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

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

Year	Number of AH Delivered
2018/19	96
2019/20	75
2020/21	91
2021/22	193
2022/23	404
2023/24	225

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

Year	Total Number AH units completed in Yatton	Total Number AH units completed in Clevedon	Total Number AH units completed in Backwell & Nailsea	Total Number AH units completed in Portishead	Total Number AH units completed in W-S-M	Total Number AH units completed in other Parishes	Total Number AH units completed
2018/19	11	0	0	0	36	35	82
2019/20	4	0	0	19	8	44	75
2020/21	60	0	0	54	15	21	150
2021/23	17	0	18	8	99	80	222
2022/23	19	2	16	135	196	32	400
2023/24	39	0	37	37	81	31	225
<b>Total</b>	<b>150</b>	<b>2</b>	<b>71</b>	<b>253</b>	<b>435</b>	<b>243</b>	<b>1,154</b>

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

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

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

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

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

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

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

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

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

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## Appendix 3 –

### Table A3.1 - Workplace-based Median House Price To Median Earnings Ratio Statistics Extract

**Table 5c - Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2023**

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
North Somerset	6.93	7.21	7.01	6.78	6.85	7.24	8.13	8.35	8.98	9.65	9.66	9.5	10.75	10.17	10.01
South West	7.24	7.76	7.61	7.59	7.53	7.78	8.17	8.53	8.85	8.92	8.77	8.74	10	9.56	9.27

House price to workplace-based earnings ratio, ONS  
Release: 25 March 2024

Three year Average: 10.31

### Table A3.2 - Live Table 244 'House Building' Extract

**Table 244 House building: permanent dwellings started and completed, by tenure, England, Historical Calendar Year Series**

This worksheet contains one table. Figures are rounded to the nearest 10, so components may not sum to totals. Some cells refer to notes which can be found in the Notes sheet.

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Calendar Year	Private Enterprise	Housing Association	Local Authority	All Starts	Private Enterprise	Housing Association	Local Authority	All Completions
	Starts	Starts	Starts		Completions	Completions	Completions	
2018	138,180	28,000	2,430	168,610	135,210	27,590	2,690	165,490
2019	123,060	28,160	1,780	153,000	143,690	32,000	2,190	177,880
2020	102,460	25,720	1,780	129,960	120,060	25,320	1,270	146,650
2021	141,430	33,950	2,580	177,950	142,130	31,220	1,590	174,950
2022	142,640	32,160	1,580	176,390	144,570	31,820	1,620	178,010
2023 [r]	116,290	30,350	3,020	149,660	120,910	36,020	2,360	159,290

Source: Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities, Date of publication: 27 June 2024

### Table A3.3- Live Table 120 'Net Additional Dwellings' Extract

**Table 120: Components of net housing supply, England, 2006-07 to 2022-23, unrounded**

This worksheet contains one table. Totals have been presented as unrounded where available, some data is only available rounded to the nearest 10, so components may not sum to totals.

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Components of net housing supply	2017-18	2018-19	2019-20	2020-21	2021-22 [r]	2022-23 [p]	Change 2021-22 to 2022-23
<b>Total net additional dwellings</b>	228,170	247,766	248,591	217,754	234,462	234,397	-65

Source: Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities, Date of publication: November 2023

**Table A3.4 - Live Table 1000c 'Additional affordable homes' Extract**

<b>Table 1000C: Additional affordable homes<sup>8,11</sup> provided by type of scheme, Completions, England</b>						
Tenure	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
All affordable <sup>8</sup>	47,388	57,226	58,964	52,072	59,170	63,909

Source: Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities, Publication Date: 27 June 2024

## Appendix 4 –

**Table A4.1 - Live Table 1008c ‘Additional affordable homes’ Extract**

Table 1008C: Total additional affordable dwellings provided by local authority area - Completions					
ONS code	Single Tier Authority Data	2009-10	2010-11	2011-12	
E0600002	North Somerset	239	112	41	

Source: Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities, Publication Date: 27 June 2024

**Table A4.2 – Statistical Data Return Extract 2011/12**

PRP Name	PRP registration number	Local Authority name	LA code	General needs - Self contained - Owned low cost rental accommodation by Local Authority area	General needs - Bedspace - Owned low cost rental accommodation by Local Authority area	Supported housing - Owned low cost rental accommodation by Local Authority area	Housing for older people - Owned low cost rental accommodation by Local Authority area	No. Low Cost Housing Units Owned where Purchaser has <100% Equity
Advance LH0280	North Soi	E060000	0	0	9	0	5	
Anchor T LH4095	North Soi	E060000	0	0	0	123	0	
Aster Cor 4691	North Soi	E060000	48	0	0	0	38	
Bristowe L1990	North Soi	E060000	9	0	0	0	0	
Brunelca LH0269	North Soi	E060000	4	0	0	0	0	
Christian H3658	North Soi	E060000	0	0	28	0	0	
East Horr LH2833	North Soi	E060000	0	0	0	0	1	
Elim Hou: LH0977	North Soi	E060000	46	0	0	0	0	
English R L4004	North Soi	E060000	22	0	0	0	0	
Gloucest L0865	North Soi	E060000	0	0	0	0	0	
Guinness 4656	North Soi	E060000	0	0	0	0	0	
Habinteg LH0459	North Soi	E060000	6	0	0	0	0	
Hanover L0071	North Soi	E060000	0	0	0	147	15	
Heart Of L4526	North Soi	E060000	0	0	0	0	0	
Home Gr. L3076	North Soi	E060000	0	0	6	0	0	
Housing : L0055	North Soi	E060000	0	0	0	76	0	
Knightstc L0291	North Soi	E060000	781	0	44	132	233	
Locking I H1972	North Soi	E060000	0	0	0	34	0	
Methodis LH2343	North Soi	E060000	0	0	0	17	0	
Metropoli L0726	North Soi	E060000	0	0	0	0	1	
Moat Hor L0386	North Soi	E060000	0	0	0	0	2	
NSAH (A L4459	North Soi	E060000	4924	0	78	1095	29	
Orbit Gro. L4123	North Soi	E060000	0	0	0	0	9	
Places fc L0659	North Soi	E060000	0	0	0	0	0	
Places fc LH3926	North Soi	E060000	10	0	2	0	2	
Raglan H L1556	North Soi	E060000	285	0	0	0	7	
Redland L0419	North Soi	E060000	232	0	1	58	19	
Rooftop LH4405	North Soi	E060000	10	66	0	0	0	
Sanctuai L0247	North Soi	E060000	8	0	52	0	0	
Sidcot Fr H0299	North Soi	E060000	0	0	0	27	0	
Somer C: LH4209	North Soi	E060000	28	0	14	0	0	
South W: L2424	North Soi	E060000	5	0	0	0	0	
Sovereig L3865	North Soi	E060000	192	0	0	0	12	
The Abbe H0348	North Soi	E060000	0	0	34	0	0	
The Guin LH0036	North Soi	E060000	89	0	9	0	15	
United H: L3758	North Soi	E060000	4	0	0	0	4	
TOTAL	North Somerset		6703	66	277	1709	332	

Source: Regulator of Social Housing

**Table A4.3 – Statistical Data Return Extract 2012/13**

PRP name	PRP registration number	Size of organisation	Local Authority name	LA code	General needs - Self contained - Owned low cost rental accommodation by Local Authority area	General needs - Bedspace (non-self-contained) - Owned low cost rental accommodation by Local	Supported housing - Owned low cost rental accommodation (units / bedspaces) by Local Authority	Housing for older people - Owned low cost rental accommodation (units / bedspaces) by Local	No. Low Cost Home Ownership Units Owned where Purchaser has <100% Equity
A2Domi	LH0391	Large	North Sc	E06000024					1
Advance	LH0280	Large	North Sc	E06000024			9		5
Anchor	LH4095	Large	North Sc	E06000024				124	
Aster C	L4691	Large	North Sc	E060000	48	0	0	0	37
Bristow	L1990	RASA	North Sc	E060000	20				
Brunel	LH0269	Large	North Sc	E060000	4				
Christiar	H3658	RASA	North Sc	E06000024			42		
Curo Pl	L0419	Large	North Sc	E060000	232	0		59	19
Curo Pl	LH4209	Large	North Sc	E060000	28	0	14	0	
East Ho	LH2833	Large	North Sc	E06000024					1
Elim Ho	LH0977	RASA	North Sc	E060000	47	0	0	0	
English f	L4004	Large	North Sc	E060000	22	0	0	0	12
Habinte	LH0459	Large	North Sc	E060000	6				
Hanovei	L0071	Large	North Sc	E06000024				147	15
Heart Of	L4526	Large	North Sc	E06000024					
Home G	L3076	Large	North Sc	E060000	0		8	0	
Housing	L0055	Large	North Sc	E06000024				76	
Knightst	L0291	Large	North Sc	E060000	813	0	44	132	237
Locking	H1972	RASA	North Sc	E06000024				34	
Methodi	LH2343	RASA	North Sc	E060000	0	0	0	17	
Metropc	L0726	Large	North Sc	E06000024					
Moat H	L0386	Large	North Sc	E06000024					2
New Fox	L4666	RASA	North Sc	E06000024			1		
NSAH	L4459	Large	North Sc	E060000	4940		93	1087	28
Orbit Gr	L4123	Large	North Sc	E06000024					8
Places f	L0659	Large	North Sc	E06000024					0
Places f	LH3926	Large	North Sc	E060000	10	0	2	0	2
Raglan f	L1556	Large	North Sc	E060000	284	0	0	0	7
Rooftop	LH4405	RASA	North Sc	E060000	10	66			
Sanctua	L0247	Large	North Sc	E060000	8		52	0	
Sidcot F	H0299	RASA	North Sc	E06000024				27	
South w	L2424	RASA	North Sc	E060000	18				
Sovereig	L3865	Large	North Sc	E060000	217				19
The Abb	H0348	RASA	North Sc	E06000024			34		
The Guir	L4729	Large	North Sc	E060000	89		8		15
United H	L3758	RASA	North Sc	E060000	4				
Western	L1446	Large	North Sc	E06000024					
<b>TOTAL</b>			<b>North Somerset</b>		<b>6800</b>	<b>66</b>	<b>307</b>	<b>1703</b>	<b>408</b>

Source: Regulator of Social Housing

**Table A4.4 – Statistical Data Return Extract 2013/14**

PRP name	PRP registration number	Size of organisation	Local Authority name	LA code	General needs - Self contained - Owned low cost rental accommodation by Local Authority area	Special needs - Bedspace (non-self-contained) - Owned low cost rental accommodation by Local Authority area	Supported housing - Owned low cost rental accommodation (units / bedspaces) by Local Authority area	Residential care for older people - Owned low cost rental accommodation (units / bedspaces) by Local Authority area	No. Low Cost Home Ownership Units Owned where Purchaser has <100% Equity
Advance Housing and Support Limited	LH0280	Large	North Somerset	E060000	0	0	9	0	4
Anchor Trust	LH4095	Large	North Somerset	E06000024				124	
Aster Communities	4631	Large	North Somerset	E060000	38				28
Bridgwater YMCA	H4245	RASA	North Somerset	E060000	0	0	9	0	
Bristowe (Fair Rent) Housing Association Limited	L1990	RASA	North Somerset	E060000	20				
Brunelcare	LH0269	Large	North Somerset	E060000	4			0	
Chapter 1 Charity Limited	H3658	Large	North Somerset	E06000024		9	42		
Curo Places (Bristol) Limited	L0419	Large	North Somerset	E060000	233	0		58	17
Curo Places Limited	LH4209	Large	North Somerset	E060000	28		31		
East Homes Limited	LH2833	Large	North Somerset	E06000024					1
Elim Housing Association Limited	LH0977	RASA	North Somerset	E060000	47	0	8	0	
English Rural Housing Association Limited	L4004	Large	North Somerset	E060000	22	0	0	0	12
Habinteg Housing Association Limited	LH0459	Large	North Somerset	E060000	6				
Hanover Housing Association	L0071	Large	North Somerset	E06000024				147	15
Heart Of England Housing Association Limited	L4526	Large	North Somerset	E06000024					
Home Group Limited	L3076	Large	North Somerset	E060000	0	0	8	0	
Housing & Care 21	L0055	Large	North Somerset	E06000024				76	
Knightstone Housing Association Limited	L0291	Large	North Somerset	E060000	839		44	132	233
Looking Deanery Housing Society Limited	H1972	RASA	North Somerset	E06000024				34	
Methodist Homes Housing Association Limited	LH2343	RASA	North Somerset	E060000	0	0	0	17	
Moat Homes Limited	L0386	Large	North Somerset	E06000024					2
New Foundations Housing Association Limited	4666	RASA	North Somerset	E06000024			1		
NSAH (Alliance Homes) Limited	L4459	Large	North Somerset	E060000	4945	0	93	1083	29
Places for People Homes Limited	L0659	Large	North Somerset	E060000	1	0	0	0	0
Places for People Individual Support Limited	LH3926	Large	North Somerset	E060000	10	0	1	0	2
Raglan Housing Association Limited	L1556	Large	North Somerset	E060000	335				7
Rooftop Homes Limited	LH4405	RASA	North Somerset	E060000	10	66			
Sanctuary Housing Association	L0247	Large	North Somerset	E060000	8		52	0	
Sidcot Friends Housing Society Limited	H0299	RASA	North Somerset	E060000	0	0	0	27	
South Western Housing Society	L2424	RASA	North Somerset	E060000	18	0	0	0	
Sovereign Housing Association Limited	L3865	Large	North Somerset	E060000	235				32
The Abbeyfield Weston-Super-Mare Society Limited	H0348	RASA	North Somerset	E06000024				2	
The Guinness Partnership Limited	4729	Large	North Somerset	E060000	89		8		15
United Housing Association Limited	L3758	RASA	North Somerset	E060000	4				
<b>TOTAL</b>			<b>North Somerset</b>		<b>6892</b>	<b>75</b>	<b>306</b>	<b>1700</b>	<b>397</b>

Source: Regulator of Social Housing


**Table A4.5 – Statistical Data Return Extract 2014/15**

PRP name	PRP regi	Size of o	Local Au	LA code	General needs - Self contained - Owned low	General needs - Bedspace (non-self-contained) -	Support ed housing - Owned low cost rental	Housing for older people - Owned low cost	No. Low Cost Home Ownership Units Owned
Advance Housing and Support	LH0280	Large	North Som	E0600002	0	0	9	0	4
Anchor Trust	LH4095	Large	North Som	E0600002	0	0	0	125	
Aster Communities	4691	Large	North Som	E0600002	48				34
Bridgwater YMCA	H4245	RASA	North Som	E06000024			9		
Bristowe (Fair Rent) Housing A	L1990	RASA	North Som	E0600002	20				
Brunelcare	LH0269	Large	North Som	E0600002	4				
Chapter 1 Charity Limited	H3658	Large	North Som	E0600002	34	16	42		
Curo Places (Bristol) Limited	L0419	Large	North Som	E0600002	253	0	0	37	15
Curo Places Limited	LH4209	Large	North Som	E0600002	28	0	31	0	0
Elim Housing Association Limite	LH0977	RASA	North Som	E0600002	69	0	0	0	
English Rural Housing Associati	L4004	Large	North Som	E0600002	30	0	0	0	12
Golden Lane Housing Ltd	4803	Large	North Som	E0600002	0	0	12	0	
Habinteg Housing Association I	LH0459	Large	North Som	E0600002	5	0	0	0	
Hanover Housing Association	L0071	Large	North Som	E0600002	1			146	15
Hilldale Housing Association Lir	4760	RASA	North Som	E06000024			3		
Home Group Limited	L3076	Large	North Som	E0600002	0	0	8	0	
Housing & Care 21	L0055	Large	North Som	E06000024				76	
Knightstone Housing Associati	L0291	Large	North Som	E0600002	1007	0	42	132	229
Locking Deanery Housing Soci	H1972	RASA	North Som	E0600002	0	0	0	34	
Methodist Homes Housing Ass	LH2343	RASA	North Som	E0600002	0	0	0	17	
Moat Homes Limited	L0386	Large	North Som	E06000024					2
New Foundations Housing Ass	4666	RASA	North Som	E06000024			1		
NSAH (Alliance Homes) Limite	L4459	Large	North Som	E0600002	4964	0	100	1079	33
Places for People Homes Limite	L0659	Large	North Som	E0600002	1	0	0	0	
Places for People Individual Suj	LH3926	Large	North Som	E0600002	10	0	1	0	2
Rooftop Homes Limited	LH4405	RASA	North Som	E0600002	10	66			
Sanctuary Housing Associatio	L0247	Large	North Som	E0600002	8		52	0	
Sidcot Friends Housing Society	H0299	RASA	North Som	E06000024				27	
South Western Housing Societ	L2424	RASA	North Som	E0600002	18	0	0	0	
Sovereign Housing Associatio	L3865	Large	North Som	E0600002	138				20
Spectrum Housing Group Limite	4759	Large	North Som	E06000024					
Stonewater Limited	L1556	Large	North Som	E0600002	335	0	0	0	7
The Abbeyfield Society	H1046	Large	North Som	E06000024				17	
The Guinness Partnership Limit	4729	Large	North Som	E0600002	89	0	8		15
United Housing Association Lim	L3758	RASA	North Som	E0600002	4	0	0	0	
<b>TOTAL</b>			North Somerset		<b>7076</b>	<b>82</b>	<b>318</b>	<b>1690</b>	<b>388</b>

Source: Regulator of Social Housing

**Table A4.6 – PRP Local Authority Trend Tool Statistical Data Return Extract**

**PRP local authority trend tool (SDR data) 2015-2023**



Select Local Authority area: North Somerset

Region: South West

[Click for help on the search function](#)

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**1 Total social units by provision type in North Somerset**

Provision Type (including Affordable Rent units in GN, SH and HOP)

		2015	2016	2017	2018	2019	2020	2021	2022	2023
Low cost rental	General needs	7,158	7,167	8,245	8,367	7,868	8,438	8,484	8,610	8,843
	contained	7,076	7,086	8,164	8,293	7,868	8,372	8,418	8,544	8,782
	General needs non-self-contained	82	81	81	74	-	66	66	66	61
	Supported housing	318	325	408	429	398	350	366	380	427
	Housing for older people	1,690	1,690	633	634	632	632	650	651	671
Low cost home ownership (LCHO)		388	397	444	459	541	553	569	650	718
<b>Total</b>		<b>9,554</b>	<b>9,579</b>	<b>9,730</b>	<b>9,889</b>	<b>9,439</b>	<b>9,973</b>	<b>10,069</b>	<b>10,291</b>	<b>10,659</b>
South West		244,941	248,978	251,806	256,018	261,214	265,593	267,870	272,711	277,645
England		2,608,767	2,655,501	2,672,026	2,708,355	2,741,601	2,777,878	2,804,350	2,842,600	2,882,687

Source: Regulator of Social Housing



## Appendix 5 – Draft Standard Method

### A5.1 Emerging National Planning Policy / Planning Reform

- A5.1.1 On the 2<sup>nd</sup> of August 2024 the Government issued an ‘Open consultation; Proposed reforms to the National Planning Policy Framework and other changes to the planning system’ (“Planning Reform Consultation” – **M1**) and a ‘National Planning Policy Framework: draft text for consultation’ (**M2**).
- A5.1.2 The Planning Reform Consultation proposes significant reforms to both the NPPF and legislation with the consultation ending in September 2024. At present the proposals therefore carry limited weight.
- A5.1.3 However, the consultation proposes to reverse many changes made in December 2023 to the NPPF including in respect of the Standard Method used to calculate Local Housing Need (“LHN”).
- A5.1.4 The Standard Method (using a revised methodology resulting in an increased overall national housing target for 370,000 homes a year) is to be used to establish local authorities’ Local Housing Need (“LHN”). It will no longer be an ‘advisory’ starting point and there is a clear emphasis on meeting identified housing needs with local authorities needing to demonstrate that ‘all possible steps’ have been taken ‘before a lower housing requirement will be considered’.<sup>54</sup> The requirement to continually demonstrate a 5 year housing land supply regardless of plan status is proposed to be restored.<sup>55</sup>
- A5.1.5 The weight attached to the benefit of affordable housing provision is increased in the draft NPPF; the presumption in favour of sustainable development in paragraph 11 makes specific reference to ‘securing affordable homes’ as one of the framework policies against which the adverse impacts of approving development proposals should be weighed.
- A5.1.6 A greater emphasis is placed on ensuring that the mix of affordable housing required through policy for both rent and sale meets identified local housing needs<sup>56</sup> including specifying minimum proportions of homes for Social Rent, albeit without any nationally prescribed percentages of specific affordable housing tenures on major developments or any

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<sup>54</sup> Planning Reform Consultation, Chapter 2, paragraph 6

<sup>55</sup> Page 20, draft NPPF

<sup>56</sup> Paragraphs 64 and 66, draft NPPF

requirement for 25% of all affordable housing to be provided as First Homes (the requirement<sup>57</sup> for which the Planning Reform Consultation proposes to remove).

A5.1.7 The Planning Reform Consultation retains the objective of bringing ‘home ownership into reach, especially for young first-time buyers’<sup>58</sup> along with a commitment to ‘**boost affordable housing**, to deliver the biggest increase in social and affordable housebuilding in a generation’<sup>59</sup> and to ‘deliver more affordable, well designed homes quickly’.<sup>60</sup>

## A5.2 Affordable Housing Need

A5.2.1 It can be noted that the draft Standard Method formula proposed by the Government in the Planning Reform Consultation published on the 2<sup>nd</sup> of August 2024 (**M1**) does not use population projections as a basis for the calculation of housing targets (‘Local Housing Need’) and instead uses a combination of existing housing stock levels and an affordability adjustment. The proposed calculation takes 0.8% of an areas existing stock levels as a starting point to which an affordability adjustment is applied - no caps on the uplifted outcome are required.

A5.2.2 The proposed affordability adjustment continues to use the workplace-based median house price to median earnings ratio statistics as an adjustment factor for the calculation of housing targets.<sup>61</sup> For every 1% in house prices above a 4:1 median house price to work-place based earnings ratio a 0.6% affordability multiplier is proposed to be applied (compared to the current 0.25%). The ‘average affordability over the three most recent years for which data is available will be used’.<sup>62</sup> In case of North Somerset this results in a three year average ratio of ‘10.31’ (see **Appendix A5.1**) which, when used in the proposed affordability adjustment calculation,<sup>63</sup> results in an adjustment factor of ‘0.9465’.<sup>64</sup>

A5.2.3 The ‘Outcome of the proposed revised method’ published by the Government on the 2<sup>nd</sup> of August 2024 reports a Local Housing Need (“LHN”) for 1,587 homes (of all tenures) per annum in North Somerset – this is significantly in excess of the 1,049 planned for in the North Somerset Core Strategy (“CS”) Policy CS13 (**F1**), but even this uplift is still unlikely to be

<sup>57</sup> ‘Affordable Homes Update’ Written Ministerial Statement of 24 May 2021 – M3

<sup>58</sup> Planning Reform Consultation, Chapter 2, paragraph 4d

<sup>59</sup> Planning Reform Consultation, Chapter 2, paragraph 4c – Planning Reform Consultation emphasis

<sup>60</sup> Planning Reform Consultation, Chapter 2, paragraph 8

<sup>61</sup> Chapter 4, paragraphs 15 to 16

<sup>62</sup> Chapter 4, paragraph 14

<sup>63</sup> Chapter 4, paragraph 15: ‘Adjustment Factor = ((Three year average affordability ratio)-4)/4\*0.6’

<sup>64</sup>  $(10.31-4)/4*0.6 = 0.9465$

sufficient to enable the delivery of 861 affordable homes per annum (suggested to be needed based on unconstrained need for affordable housing from households within the North Somerset Local Housing Needs Assessment Report of Findings (October 2023) (“LHNA23” – **H6**) and which equates to c.54% of the draft Standard Method outcome – see Section 3.2 of the Affordable Housing Proof of Evidence) given outcomes in the Council’s viability evidence.<sup>65</sup>

A5.2.4 For Yatton<sup>66</sup> the proposed dwelling stock based calculation suggests a Local Housing Need (“LHN”) for c.67 homes (of all tenures) per annum compared to 62 based on the demographic projection in the Yatton LHNA. Assuming, based on the LHNA23, that from c.38.5% (‘policy-on’ constrained) to 89.5% (unconstrained) of the draft Standard Method overall housing requirement for Yatton<sup>67</sup> are needed as affordable housing (see **Appendix A5.1 Table A5.1.2a**) suggests an:

- iii) Unconstrained affordable housing Need: for c.300 affordable homes over 5 years (c.60<sup>68</sup> affordable homes per annum)
- iv) Constrained ‘policy-on’ affordable housing Need: for c.129 affordable homes over 5 years (c.26<sup>69</sup> affordable homes per annum)

A5.2.5 Whilst the draft Standard Method is still the subject of consultation this suggests that proposed planning reforms would require an increased level of affordable housing provision across Yatton to that modelled within the Yatton LHNA.

### *Summary*

A5.2.6 Where the draft Standard Method is applied to Yatton<sup>70</sup> (to assess the overall LHN) and applied in conjunction with affordable housing need proportions in the LHNA23 this suggests an unconstrained need for 300 affordable homes and a constrained need for 129 affordable homes 2024/25 to 2028/29 (5 years) (i.e. 26 to 60 per annum) – see **Appendix A5.1**. For North Somerset the draft Standard Method results in significant uplifts to the level of overall

<sup>65</sup> Dixon Searle Viability Assessment for North Somerset Local Plan 2039, Final Report, November 2023 (**G8**) and paragraph 5.3.5 of the Yatton LHNA (**B8**)

<sup>66</sup> Based on the best fit Lower Layer Super Output Areas (LSOA) for the Parish - North Somerset 012A, North Somerset 012B, North Somerset 012C, North Somerset 012D, North Somerset 012E, North Somerset 012F best for comparison with the demographic modelling in the Yatton LHNA.

<sup>67</sup> Based on the same best fit LSOA as used in the demographic projections.

<sup>68</sup> 60.04 unrounded

<sup>69</sup> 25.83 unrounded

<sup>70</sup> Using best fit LSOA for the Parish to align with the demographic modelling Study Area

housing currently planned for, but even this is unlikely to be able to full address assessed affordable housing need.

### A5.3 Affordable Housing Shortfall

A5.3.1 Where the draft Standard Method is used in conjunction with LHNA23 affordability assumptions to calculate affordable housing need 2024/25 to 2028/29 this suggests an increased unconstrained and constrained affordable housing need (at c.26 homes per annum constrained and c.60 homes per annum unconstrained) in Yatton to that based on the 'top down' and demographic modelling in the Yatton LHNA. Compared to planned supply, affordable housing need based on the draft Standard Method overall housing need outcome suggests a shortfall of between 2 and 172 affordable homes in Yatton between 2024/25 and 2028/29 (see **Appendix A5.1 Table A5.1.2c**).

A5.3.2 Where the draft Standard Method is applied to Yatton during the 2024/25 to 2028/29 five year period to provide the overall housing requirement underpinning the affordable housing need outcome and added to the shortfalls assessed based on the analysis of affordable housing Need and Past Supply at section 4.1 of this Proof of Evidence the **affordable housing shortfall which will accrue is 364 to 534 homes by 2028/29 (see Appendix A5.1 Tables A5.1.2b, A5.1.2c and A5.1d)**.

### A5.4 Affordability Indicators

A5.4.1 The draft Standard Method being consulted on by the Government retains house price to income ratios within the affordability adjustment for Local Housing Need calculations *and* increases the multiplier where the ratio of house prices to earnings exceeds 4:1 from 0.25% to 0.6%, thus reflecting an increased commitment to building more homes in less affordable locations.

### A5.5 Summary And Conclusion

A5.5.1 The draft Standard Method results in a Local Housing Need ("LHN") in North Somerset for 1,587 homes (of all tenures) per annum – this is significantly more than the 1,049 planned for in extant local policy. However, given outcomes in the Council's viability evidence, even this uplift is unlikely to be sufficient to enable the delivery of 861 affordable homes needed

per annum (based on the unconstrained need for affordable housing from households within the LHNA23) and which equates to c.54% of the draft Standard Method LHN.

A5.5.2 Where the draft Standard Method is applied to Yatton during the 2024/25 to 2028/29 period to provide the overall housing requirement underpinning the Affordable Housing need outcome and added to the shortfalls assessed based on the analysis of Affordable Housing Need analysis shows that **the affordable housing shortfall which will accrue increases to 364 to 534 homes by 2028/29.**

## Appendix A5.1 –

### Table A5.1.1 - Workplace-based Median House Price To Median Earnings Ratio Statistics Extract

Table 5c - Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2023

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
North Somerset	6.93	7.21	7.01	6.78	6.85	7.24	8.13	8.35	8.98	9.65	9.66	9.5	10.75	10.17	10.01
South West	7.24	7.76	7.61	7.59	7.53	7.78	8.17	8.53	8.85	8.92	8.77	8.74	10	9.56	9.27

House price to workplace-based earnings ratio, ONS  
Release: 25 March 2024

Three year Average: 10.31

### Table A5.1.2a - Yatton Draft Standard Method Calculations

#### Yatton Parish (Based on Best Fit LSOA)

Dwelling Stock (2021 Census):	4,308
Dwelling Stock x 0.8% for annual increase:	34.464

Three Year AvAR:	10.31
Adjustment Factor:	0.9465

(Table 5c - Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2023)

New Standard Method Local Housing Need (LHN all tenures) per annum:	67.1
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i.e.  $34.464 \times (1 + 0.9465)$

For comparison: Pioneer demographic projected LHN (all tenures) per annum (Yatton LHNA):	62
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NB: based on 2014 hhold proj adjusted to reflect local population characteristics and to include an affordability adjustment and vacancy rate to convert to homes - see Fig 4.2.2 of Yatton LHNA

#### Implication of new Standard Method for Affordable Housing need in Yatton:

.@ 38.5% of overall LHN (as per Yatton LHNA):	25.83
.@ 89.5% of overall LHN (as per Yatton LHNA):	60.04

(compared to 23.45 homes in Yatton LHNA Fig 5.2.1)

(compared to 54.50 homes in Yatton LHNA Fig 5.2.1)

**NB: This is before planned / committed supply is deducted**

Source: Pioneer Analysis August 2024, draft Standard Method

**Table A5.1.2b – Yatton affordable housing shortfall 2009/10 to 2023/24 – extract from Figure 4.1.2 in the Affordable Housing Proof of Evidence**

Year	Annual Affordable housing Need	Affordable housing Supply (Net)	Surplus / Shortfall**
2009/10	34	-1	-35
2010/11	34	-1	-35
2011/12	34	0	-34
2012/13	34	0	-34
2013/14	34	0	-34
2014/15	34	0	-34
2015/16	34	0	-34
2016/17	34	0	-34
2017/18	34	0	-34
2018/19	34	11	-23
2019/20	34	4	-30
2020/21	34	60	26
2021/22*	34	17	-17
2022/23*	34	19	-15
2023/24*	34	39	5
<b>TOTAL</b>	<b>510</b>	<b>148</b>	<b>-362</b>

Source: Figure 4.1.2 in the Affordable Housing Proof of Evidence

**Table A5.1.2c - Yatton Draft Standard Method Based Affordable Housing Need 2024/25 to 2028/29**

Draft Standard Method based affordable housing need:

Year	Annual Affordable Housing Need		Affordable Housing Supply (Net)	Surplus / Shortfall	
	Constrained 'Policy-on'	All Eligible Hholds		Constrained 'Policy-on'	All Eligible Hholds
2024/25	26	to 60	25.6	-0.4	to -34.4
2025/26	26	to 60	25.6	-0.4	to -34.4
2026/27	26	to 60	25.6	-0.4	to -34.4
2027/28	26	to 60	25.6	-0.4	to -34.4
2028/29	26	to 60	25.6	-0.4	to -34.4
<b>TOTAL</b>	<b>130</b>	<b>to 300</b>	<b>128</b>	<b>-2</b>	<b>to -172</b>

Source: Pioneer Analysis August 2024, draft Standard Method

**Table A5.1.2d - Yatton Draft Standard Method Based Affordable Housing Need 2024/25 to 2028/29 Plus Any Affordable Housing Need Shortfall from 2009/10 to 2023/24**

<b>Period</b>	<b>Affordable Housing Need (including future need based on Draft Standard Method)</b>	<b>Affordable Housing Supply (Net)</b>	<b>Surplus / Shortfall</b>
2009/10 to 2028/29	640 to 810	276	-364 to -534

Source: Pioneer Analysis August 2024, draft Standard Method

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