

**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**

**SUMMARY 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:

22nd August 2024

1 SUMMARY AND CONCLUSION

Policy Context

- 1.1 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.
- 1.2 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’.
- 1.3 The adopted policy, CS Policy CS16 ‘Affordable Housing’, targets the delivery of only 150 affordable homes per annum. This equates to only c.14% of the anticipated overall housing supply of 1049 dwellings and falls significantly short of the level of affordable housing need identified within the 2009 West of England Strategic Housing Market Assessment (“SHMA09”) and within the North Somerset Local Housing Needs Assessment Report of Findings (October 2023) (“LHNA23”) – albeit the latter assessment excludes significant numbers of households eligible for affordable housing for sale.
- 1.4 Emerging Local Plan Policy DP43 seeks 38.5% affordable housing on eligible Greenfield sites and 20% on eligible previously developed land (“PDL”) 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).
- 1.5 **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

- 1.6 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
- 1.7 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

- 1.8 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).
- 1.9 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.
- 1.10 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.
- 1.11 Location specific 2021 Census data on the tenure of existing Affordable Housing stock in the March 2024 Yatton Parish Local Housing Need Report ("Yatton LHNA") submitted in support of the planning application confirms Yatton has low levels of affordable home ownership ("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

- 1.12 Nationally, we remain in the midst 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.
- 1.13 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
- 1.14 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.
- 1.15 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.
- 1.16 The prioritisation of the provision of additional affordable housing in the district is a primary objective within Development Plan policy.

1.17 The need for additional affordable housing in North Somerset remains acute. There is significant, unmet affordable housing need in the district and, within that context, it is worthy of emphasis to note 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,

1.18 It is therefore my conclusion and recommendation 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 an established, acute, shortfall in the provision of affordable housing to meet the identified housing need within the locale and wider district.

DAVID PARKER MSc BA(Hons) DMS FCIH
Pioneer Property Services Ltd
Islington House
60 Semington Road
Melksham
Wiltshire
SN10 2RZ

22nd August 2024