

Town and Country Planning Act 1990 (as amended)

Proof of Evidence on Housing Mix On behalf of Keepmoat Homes Ltd.

An appeal by Keepmoat Homes Ltd against Newark and Sherwood District Council's decision to refuse an application for planning permission. The appeal proposal is for residential development of 103 dwellings and associated access and infrastructure, on Field Reference Number 7108, Eakring Road, Bilsthorpe.

PINS Reference: APP/B3030/W/3265876

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Inspectorate Ref: APP/B3030/W/326587
Planning Application Ref: 20/00873/FULM

Appeal Site: Field Reference Number 7108, Eakring Road, Bilsthorpe

Town and Country Planning Act 1990
Section 78

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Prepared on behalf of
Keepmoat Homes Ltd

Evidence of
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CONTENTS	PAGE
1.0 Experience and Scope of Evidence.....	4
a) Experience.....	4
b) Scope of this Evidence	5
2.0 Introduction.....	6
3.0 Housing Need and Housing Mix National Policy, Guidance And Appeal Decisions	8
a) National Planning Policy Framework and Guidance.....	8
i) Delivering a sufficient supply of homes	8
ii) National Planning Practice Guidance.....	8
iii) The Buffer.....	Error! Bookmark not defined.
b) Conclusion.....	8
4.0 Local Policy.....	9
a) Amended Core Strategy (2019)	9
b) Housing Monitoring and Five Year Housing Land Supply Report (2020).....	10
5.0 The Housing Requirement	Error! Bookmark not defined.
a) Local Housing Need in Newark and Sherwood	Error! Bookmark not defined.
b) Requirement for Five Year Land Supply	Error! Bookmark not defined.
6.0 Review of the Newark and Sherwood Housing Need Assessment – December 2020	12
7.0 Context of Housing in Bilsthorpe – Local Housing Need	18
a) Existing Housing Stock by Dwelling Type	18
b) Existing Housing Stock by Number of Bedrooms.....	19
c) Recent Completions and Sales.....	21
d) Emerging Housing Stock	22
8.0 The Keepmoat Proposal.....	25
9.0 Summary and Conclusions	27
LIST OF APPENDICES	29


1.0 EXPERIENCE AND SCOPE OF EVIDENCE

a) Experience

- 1.1 My name is Alex Roberts; I have a Joint Honours Degree in Urban and Regional Planning and Geography and am an Associate Member of the Royal Town Planning Institute. I am currently a Director of DLP Planning Ltd (DLP), specifically the Strategic Planning Research Unit (SPRU) which specialises in undertaking bespoke planning research projects including Housing Need Assessments, Local Housing Need Assessments and analysis of housing mix. DLP Planning Ltd are a national planning consultancy and I am based in the Sheffield office.
- 1.2 I have a wide range of experience and have held various positions within local government culminating in the post of Development Plan Manager at Tamworth Borough Council. During this time, I was responsible for producing the Tamworth Local Plan adopted in February 2016.
- 1.3 Between 2004 and 2006, I worked at Swansea University. Whilst at the university I undertook research into and assessments of the 2001 Census and in particular changes to urban populations since 1991. Through this work I wrote articles and papers with colleagues. I also taught undergraduate courses on the use of statistical analysis and geographic information systems (GIS) in research.
- 1.4 In 2006, I took up the position of Planner within the Cassidy Group, based in Meriden. I undertook work identifying development opportunities across England and promoted the development of sites through the development plan process.
- 1.5 In 2007, I began working with Wakefield Council as a Senior Planner, within the Spatial Policy department. Whilst at the Council I assisted regional colleagues on the preparation of the Yorkshire and Humber Regional Strategy, in respect of housing and employment need. I prepared and gave evidence regarding housing need and supply at the examination of the Council's Core Strategy, Area Action Plan and Site Allocations DPD.
- 1.6 In 2012, I joined Tamworth Borough Council as Development Plan Manager, a post which I held for 3 years. Within that time, I prepared and represented the Council at the examination of the Tamworth Local Plan (adopted 2016). I also represented the Council at a sub-regional and regional level on strategic planning issues, with particular focus on housing, employment and transport. I was a member of the GBSLEP (Greater Birmingham and Solihull LEP) Spatial Planning Steering Group which sought to prepare a plan to guide development in the region to tackle the issue of un-met housing need.
- 1.7 I have been with DLP Planning for over 5 years. During this time, I have advised private and public sector clients on a wide range of planning issues with particular focus upon the calculation of housing need and 5-year land supply, appearing at both Local Plan examinations and planning appeals, including public inquiries.
- 1.8 For over 2 years I was a Member of the RTPI Membership Panel which has delegated authority to make decisions on applications to join the Institute. For this I was required to make assessments of each application against strict membership criteria.

b) Scope of this Evidence

- 1.9 I have been instructed by Keepmoat Homes Ltd to prepare a proof of evidence which considers the Council's most up to date assessment of housing mix and any other available information.
- 1.10 I confirm that this evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I also confirm that the opinions expressed are my true and professional opinions.

Signed	
Name	Alex J Roberts BSc (Joint Hons) AssocRTPI
Position	Director, DLP Planning Ltd
Date	13 April 2021

2.0 INTRODUCTION

- 2.1 The appeal is made by Keepmoat Homes Ltd ('the appellant') against the decision of Newark and Sherwood District Council ('the Council') to refuse a planning application for up a residential development of 103 dwellings and associated access and infrastructure on Field Reference Number 7108, Eakring Road, Bilsthorpe.
- 2.2 I have been instructed by Keepmoat Homes Ltd to give evidence on the issue of housing mix in Bilsthorpe and I will be giving evidence on behalf of the appellant.
- 2.3 The Council's extant policy on housing mix is Core Policy 3 (CD5.12) 'Housing Mix, Type and Density' of the Amended Core Strategy (CD5.5) adopted March 2019).
- 2.4 The Council's most recently published evidence on housing need (including recommendations for dwelling type and mix at a district and sub-area level) is set out in the Housing Needs Assessment (HNA) prepared by arc4 in December 2020 (CD6.20). This evidence did not inform Core Policy 3 of the adopted Core Strategy.

a) The Council's Case

- 2.5 The Council's case is set out in their Statement of Case (CD6.13), of relevance to my proof of evidence, which deals with housing mix, are paragraphs 3.16 to 3.20 (pages 14 to 16) and 4.31 to 4.32 (pages 29 to 30) present the Council's case on this specific matter.
- 2.6 With regards to housing mix I understand the Council's case to be as follows:
- a. The HNA identifies a strategic need to meet the needs of an ageing population.
 - b. The HNA identifies a strategic need to develop housing for younger age groups and a range of income groups.
 - c. The HNA identifies that within the Newark Sub Area, there is a particular need for 3 bed houses (45.2%) and 4 bedroom houses (27.9%) and 2+ bedroom bungalows (21.5%). Demand for 1 or 2 bedroom units is within affordable tenure only.
 - d. The Council concludes that a better housing mix would have seen some 3 bedroom houses replaced by 2 bedroom bungalows and some 3 bedroom houses replaced by 1 bedroom flats.
- 2.7 In summary my response to the Council's case on the specific matter of housing mix, is that:
- a. Amended Core Strategy policy Core Policy 3 does not specify any split in mix for proposed developments, for example 50% should be 4 bedrooms, 50% should be 1 bedroom. Instead, at a strategic level it lists 3 areas of need which housing developments should address: 3+ bedroom housing, 2 bedroom or less houses and housing for elderly and disabled persons.
 - b. The policy has no specific requirement for house types, e.g., bungalows, flats or houses.
 - c. The policy states that the Council will seek to secure an appropriate mix of housing types to reflect local need. However, the Council do not have an assessment of local need for Bilsthorpe, the only available need assessments are at a district level and a sub-area level.
 - d. The policy goes further and states that such a mix will be dependent on local circumstances of the site, the viability of the development and any localised housing need information. Therefore, a proposed development mix will need to be balanced and arrived at using these criteria.

- e. The Housing Need Assessment 2020 prepared by Arc4, did not inform the preparation or examination of Core Policy 3. The 2020 HNA has not been tested at a Local Plan examination, nor does it inform any wider housing, or needs strategy of the Council.
- f. The Amended Core Strategy has no policy to implement the HNA's recommendation to meet the needs of an ageing population as purported in the HNA.
- g. There is no wider housing strategy of the Council, or County Council to meet the needs of an ageing population as purported in the HNA.
- h. The appeal site **will assist** with Core Policy 3 to bring forward family housing of 3 bedrooms or more.
- i. The appeal site **will assist** with Core Policy 3 to bring forward smaller houses of 2 or less. In addition, as identified in the HNA 2020 and in the Council's Statement of Case, these will be affordable units.

2.8 The above points (a to i) in paragraph 2.7 above will be expanded upon in my proof of evidence.

b) The Appellant's Case

- 2.9 The Appellant's case, specific to housing mix, is set out in their Statement of Case (CD 6.4) from paragraph 6.30 to 6.46. Whilst the 2014 HNA has been superseded by the 2020 HNA, the Appellant's position remains the same; that the limb of the Council's reason for refusal regarding housing mix is still not justified.
- 2.10 I consider that the mix of the appeal site **does meet** housing needs and crucially is in accordance with Core Policy 3.
- 2.11 The mix of the scheme secures family housing of 3 beds or more and provides smaller houses of two beds or less, furthermore as identified in the 2020 HNA the preference in the Sherwood sub-area is for 2 bed houses to be affordable, which all the 10 bed houses on the appeal scheme are. This has been achieved when considering the local circumstances of the site, the viability of development and localised housing need.
- 2.12 As evidenced in the 2020 HNA, there is a need for housing which is affordable¹ for first time buyers and young families. As set out in the Appellant's Statement of Case (6.36 to 6.37), the research commissioned by Keepmoat at the planning application stage, demonstrates that the Keepmoat Home product is affordable to these key groups.
- 2.13 Furthermore, as referred to at 6.38 in the Statement of Case, the Government's response to the Covid-19 pandemic is having implications on working practices and therefore demand in the property market. This has not been explored in the 2020 HNA and will undoubtedly have implications on household's aspirations and demand for house types. For example, a household in need of a two bed home, may now have an aspiration for a larger home because they work from home several days a week. The additional space would facilitate this happening.

¹ To clarify, this does not mean affordable housing.

3.0 HOUSING NEED AND HOUSING MIX NATIONAL POLICY, GUIDANCE

3.1 This chapter sets out the applicable National Planning Policy Framework and Planning Practice Guidance paragraphs.

a) National Planning Policy Framework and Guidance

i) Delivering a sufficient supply of homes

3.2 The 2019 National Planning Policy Framework (the Framework) was published on 20th February 2019 and came into force with immediate effect.

3.3 Chapter 5 of the Framework covers the delivery of a sufficient supply of homes.

3.4 Paragraph 59 of the Framework states:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

3.5 Paragraph 60 states that the Local Housing Need (LHN) is to be calculated using the standard methodology unless exceptional circumstances justify an alternative approach. In addition to the housing need figure calculated by the standard methodology, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

3.6 Paragraph 61 of the Framework states that *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”*. This includes, for example, planning for those who require affordable housing, and families with children.

ii) National Planning Practice Guidance

3.7 There is no specific guidance how needs of different groups, apart from affordable housing, older persons and gypsies and travellers, should be calculated.

b) Conclusion

3.8 In summary, local planning authorities are required to ensure that the needs of different groups with specific housing requirements, such as families with children, are assessed and met through planning policies. Apart from the need to prepare evidence and subsequent planning policies, there is no specific guidance on how these needs should be assessed, there is no specific paragraph within the Framework which sets out how matters of housing mix should be dealt with by a decision maker, there is no nationally prescribed housing mix and such matters such be dealt with through a Local Plan.

4.0 LOCAL POLICY

a) Amended Core Strategy (2019)

- 4.1 The Council's most up-to-date policy on housing mix is Core Policy 3 'Housing Mix, Type and Density' (CD 5.12) of the Amended Core Strategy, adopted March 2019 (CD 5.5). In respect of housing mix, this policy states:

"The District Council will seek to secure new housing development which adequately addresses the housing need of the District, namely:

- *Family housing of 3 bedrooms or more*
- *Smaller houses of 2 bedrooms or less.*
- *Housing for the elderly and disabled population.*

Particular emphasis will be placed on securing smaller houses of 2 bedrooms or less and those for housing for elderly and disabled population.

The District Council will seek to secure an appropriate mix of housing types to reflect local housing need. Such a mix will be dependent on the local circumstances of the site, the viability of the development and any localised housing need information". (emphasis added)

- 4.2 The supporting policy wording for Core Policy 3 (at paragraph 5.13) states that:

"The [Housing Needs, Market and Affordability Study 2014] also indicates that need is more focused towards smaller properties. In general terms, the indicated split in the study is that 50% of all new dwellings should be 1 or 2 bedroom dwellings and 50% should be of 3 bedrooms and above. An appropriate mix will depend on the local circumstances and information on local need in the particular part of the district where development is proposed".

- 4.3 This policy has been drafted with the intention of being flexible, as highlighted in the emphasis above. It is this section of the policy which I consider to be specific to decision taking. The flexibility of the policy is there to ensure new houses do get built in the District and thus meeting the objective and policy obligation of meeting the Plan's identified housing requirement. The housing mix of new developments, as set out in policy, is a balance between local circumstances, viability, and localised housing need information, this gives the policy flexibility.

- 4.4 I consider that the three bullet points are strategic in nature, this is because they are high level and can be achieved independently of one another. In particular, the final bullet point refers to specific housing products which are usually delivered by specialists in the housing market and very rarely delivered by national house builders, it can be considered mutually exclusive. For example, the developer of a proposed new development for a retirement village of 50 dwellings, would not typically deliver a small number of 3 bedroom family houses. Likewise, an allocation to be delivered by a housebuilder would not deliver a small number of retirement dwellings. But independently the developments could achieve these objectives of the Council.

- 4.5 The suggested 50-50 split of 1-2 bedroom dwellings and 3+ bedroom dwellings, in the supporting text, is not included in the policy wording and is therefore not a policy requirement.

- 4.6 Core Policy 3 requires the mix of housing types to be 'appropriate' and to 'reflect local need'. The policy does not specify, or require, what house types should be built, e.g., flats, bungalows, or houses.

- 4.7 The Housing Needs, Market and Affordability Study (2014) referred to in the supporting policy

wording for Core Policy 3 has since been superseded by the recently published Housing Needs Assessment (HNA) (arc4, December 2020).

b) Housing Monitoring and Five Year Housing Land Supply Report (2020)

- 4.8 Only one published annual monitoring report² (CD 7.7) covers the period since the adoption of the amended Core Strategy in 2019. This covers the period 1st April 2019 to 31st March 2020 and sets out the number of (gross) dwelling completions by bedroom size and sub-area for the monitoring period. These figures are shown in Table 1 below. As expected, there is no analysis of house type (house, bungalow, flat) as there is no requirement for certain house types in the adopted policy.

Table 1. Completions by bedroom size and area (1st April 2019 to 31st March 2020)

Plan Area	Bedroom Size					Total	Total (%)
	1	2	3	4	5+		
Newark & Rural South Sub-Area 1	24	34	35	64	11	168	29%
Collingham Sub-Area 2	0	7	18	13	7	45	8%
Rural North Sub-Area 3	1	13	12	3	1	30	5%
Southwell Area	9	13	20	34	7	83	14%
Nottingham Fringe Area	1	0	4	0	0	5	1%
Sherwood Area	7	22	23	11	2	65	11%
Mansfield Fringe Area	13	37	80	60	0	190	32%
Total	55	126	192	185	28	586	100%
Total (%)	9%	22%	33%	32%	5%	100%	

Source: 2020 Housing Monitoring and 5 Year Housing Land Supply Report (Newark and Sherwood District Council, 2020, Figure 22)

- 4.10 This data reveals that across the district, as a whole, in the year 2019-2020, 31% of dwelling completions were 1-2 bedrooms and 70% of dwellings were 3+ bedrooms.
- 4.11 In the Sherwood sub-area, within which the appeal site is located, 45% of dwelling completions were 1-2 bedrooms and 55% of dwelling completions were 3+ bedrooms. A smaller proportion of dwelling completions in the Sherwood sub-area were 4 bedroom dwellings (17%) compared with 32% across the district as a whole.
- 4.12 This analysis at the District and Sherwood Sub-Area level confirms how Core Policy 3 should be interpreted, it is through the delivery of many new development proposals that the broad

² Housing Monitoring and 5 Year Land Supply Report 2020

objectives, or strategic elements, of Core Policy 3 will be met. Clearly through a range of development sites, each with their own factors to allow for flexibility, a higher proportion of smaller bedroom homes have been delivered in the Sherwood Sub-Area than at a District level.

- 4.13 I consider that this shows some sub-area priorities for Sherwood are being met and some are not. Table 3 within section 5 of my proof shows the HNA's priorities for the Sherwood sub-area. These are split between market, affordable and intermediate priorities. The Council's AMR analysis does not split completions down in a similar way, nor does it split between houses, bungalows and flats, so therefore it is not possible to compare the two exactly. However, when looking at market need priorities in the sub-area as proxy indicator for need profile, against total completions by size, as in table 1 above, it shows a priority need for 4+ bed developments at 27.9%, which is not being met, 3 bed developments at 51.4%, which is not being met and 1 and 2 bed developments at 20.7%, which has been exceeded.

Bed Size Property	Sub Area Market Priority %	Sub-Area Report %	Monitoring
1 to 2	20.7	45	
3	51.4	35	
4+	27.9	20	

5.0 REVIEW OF THE NEWARK AND SHERWOOD HOUSING NEED ASSESSMENT – DECEMBER 2020

- 5.1 At the time of the determination of the approved outline application, the refusal of the application (which is now the subject of this appeal) and the submission of the Appellant's Statement of Case for this appeal, the Council's evidence regarding housing mix was drawn from the Housing Needs, Market and Affordability Study (2014). This document has since been superseded by the December 2020 study (CD 6.20). This was made available to the Appellant on 3rd March 2021.
- 5.2 The Council has also conducted several household surveys at the Parish level between 2005 and 2020. No survey of Bilsthorpe Parish has been undertaken by the Council to date.
- 5.3 As set out in the Appellant's Statement of Case (CD 6.4), paragraphs 6.40 to 6.45 and tables 1, 2 and 3 (pages 25 to 27), the Council had previously accepted the housing mix for the outline application on this site, when the 2014 study was their most up to date evidence at the district level. The indicative mix, in terms of percentage per dwellings size, in the outline and the mix in the application scheme (which is now the subject of this appeal) are broadly the same.

c) Review of the Newark and Sherwood Housing Need Evidence Assessment – December 2020

- 5.4 The Council's most recently published evidence on housing need (including recommendations for dwelling type and mix) is set out in the 2020 HNA. This evidence is presented in the form of both a district-wide assessment of housing need and a series of sub-area summaries. The appeal site located in Bilsthorpe is within the Sherwood sub-area. The Amended Core Strategy does not sub-divide the District into sub-areas through a distribution or hierarchy policy, they are referenced in the descriptive text of the Spatial Portrait of Newark and Sherwood.
- 5.5 The HNA (2020) was partly informed by a household survey of a random sample of 13,266 households (approximately 25% of the District total) undertaken in 2020. Technical Appendix D of the 2020 HNA (CD 6.20) sets out the method used to model future dwellings type and size mix across the district.

iii) Key Strategic Matters Identified in the HNA and the Council's Statement of Case

- 5.6 At page 12 of the HNA, the key strategic messages at the district level are listed. Those which I consider relevant to this appeal are as follows:
- a. New development needs to reflect the needs of an ageing population.
 - b. Continue to develop housing for younger age groups.
 - c. Continue to develop housing for a range of income groups to support economic growth.
 - d. Increase the number of 2 and 3 bed dwellings delivered.
 - e. Increase the delivery of bungalows.
 - f. The majority of older people want to remain in their own homes with help and support when needed.
 - g. Need to increase provision of specialist older persons housing, such as extra care and retirement housing.
 - h. To deliver 1% of new dwellings to M4(3) and 23% of new homes to M4(2) standards.

- 5.7 The evidence and justification for each of the key messages is set out in the HNA in subsequent chapters.
- 5.8 Turning to the Council's Statement of Case, paragraphs 4.31 to 4.32, the key points which are drawn out are:
- a. An increase in the requirement for 4 bedroom houses
 - b. Meeting the needs of an ageing population – through 2 and 3 bed bungalows
 - c. 3 bedroom houses for first time buyers and younger persons
- 5.9 These points align with the HNA's key strategic matters.
- 5.10 In paragraph 4.32 of the Council's Statement of Case it is clear the outstanding objections to the proposed mix of the appeal scheme is focused on bungalows and -1 & 2-bedroom flats.
- 5.11 Therefore, my review of the Council's District HNA evidence will focus on the evidence supporting the need for bungalows and flats.

iv) Summary of tenure and mix split at a district and sub-area geography

- 5.12 Table D.9 of Appendix D (CD 6.20) (reproduced in Table 2 below) sets out the proportion of new housing which should fall within each dwelling type by number of bedrooms and tenure mix under the baseline demographic scenario for the period 2019 to 2033. There are a total of 27 different tenures, house type and size combinations, which the HNA is recommending to achieve. I consider this to be a very high number of different overall house types to deliver and would therefore be difficult to achieve this separately on all developments.

Table 2. Overall dwelling type and number of bedrooms by and tenure mix under baseline demographic scenario, 2019-2033 (Column %)

Dwelling type and number of bedrooms	Tenure			Total
	Market	Affordable Rented	Intermediate	
1 or 2 bedroom house	5.0	19.1	6.0	7.7
3 bedroom house	40.4	23.5	37.0	36.9
4 or more-bedroom house	10.9	15.5	37.0	14.8
1-bedroom flat	6.9	5.9	0.0	5.9
2 or 3- bedroom flat	2.8	0.1	0.2	2.0
1-bedroom bungalow	-0.6	9.9	1.3	1.5
2-bedroom bungalow	22.1	21.0	7.4	20.2
3 or more bedroom bungalow	11.2	2.7	11.1	9.6
Other	1.5	2.3	0.0	1.4
Total	100.0	100.0	100.0	100.0
Dwelling type	Market	Affordable Rented	Intermediate	Total
House	56.3	58.0	80.0	59.4
Flat	9.6	6.0	0.2	7.9
Bungalow	32.7	33.6	19.8	31.3

Other	1.5	2.3	0.0	1.4
Total	100.0	100.0	100.0	100.0
Number of bedrooms	Market	Affordable Rented	Intermediate	Total
1	7.0	17.5	1.8	8.3
2	30.4	40.8	13.2	30.2
3	51.7	26.2	48.1	46.7
4	10.9	15.5	37.0	14.8
Total	100.0	100.0	100.0	100.0

Source: Table D.9, HNA (2020)

5.13 Table 5.12 of the 2020 HNA (reproduced in Table 3 below) sets out the future development priorities of the Sherwood sub-area by dwelling type and number of bedrooms. This analysis is based on different data to the district-level analysis because detailed demographic projection data is not available at the sub-area level. Paragraph 5.14 of the HNA (2020) states that this sub-area analysis is based on:

- “the aspirations/expectations of market housing for households planning to move at the sub-area level;
- the need for affordable rented housing based on the findings of sub-area housing need analysis; and
- the need for affordable home ownership housing based on the district-wide need (this is used because the samples considering affordable home ownership at the sub-area level are too low for meaningful results).”

Table 3. Dwelling mix and future development priorities: Sherwood

Dwelling type and number of bedrooms	Current stock profile (%)	Market need profile (%)	Affordable rented need profile (%)	Intermediate need profile (%)
1 to 2-bedroom house	3.4	0.0	42.5	6.0
3-bedroom house	46.3	45.2	17.3	35.8
4 or more-bedroom house	17.2	27.9	0.0	35.8
1-bedroom flat	4.6	4.3	6.5	0.0
2 or more-bedroom flat	1.4	1.1	0.0	0.4
1-bedroom bungalow	3.2	0.0	8.9	2.4
2-bedroom bungalow	12.6	15.3	17.9	7.9
3 or more-bedroom bungalow	9.7	6.2	6.8	11.7
Other	1.5	0.0	0.0	0.0
Total	100.0	100.0	100.0	100.0

Source: Table 5.12, HNA (2020)

v) Evidence to Support the Need for Bungalows

- 5.14 As set out above, one of the HNA's key strategic matters for the District is the delivery of bungalows.
- 5.15 The evidence used to support this objective is set out in sections 2 (housing market and key drivers) and 4 (The needs of different groups) of the HNA and brought together in 5 (Overall housing need).
- 5.16 When looking at the dwelling stock information for Sherwood sub-area compared to the District, it is notable that 17% of district stock is bungalows, whereas 26.5% of Sherwood stock is bungalows. (paragraphs 2.6 to 2.7 page 22 CD 6.20).
- 5.17 Stakeholder interviews are summarised in section 2 and throughout the HNA, they contribute to the HNA's view on the need for older persons housing needs and seemingly bungalows. The response to stakeholder engagement is set out in appendix E. Stakeholders identified that there was a gap in supply for older persons housing in terms of specialist housing needs, bungalows are referenced together with sheltered accommodation and downsizing. However, no justification is set out why stakeholders consider older persons, who would normally live in standard market housing, not specialist accommodation, need to live in bungalows.
- 5.18 When looking at the demographic projections in section 2, it is summarised in paragraph 2.67 that households with persons over the age of 60 will be one of the largest increases in household types between 2019 and 2033.
- 5.19 Section 4 of the HNA looks at meeting the needs of specific groups, a large part of this section is concerned with meeting needs of older persons. Paragraphs 4.101 to 4.107 set out the specialist accommodation needs for older persons.
- 5.20 I consider that paragraph 4.101 misinterprets the PPG regarding bungalows. PPG Paragraph: 012 Reference ID: 63-012-20190626, gives Plan Makers the option of bungalows for people to move to as well as adapting their own homes, as an alternative to living in specialist older housing.

Do plans need to make specific provision for specialist housing for older people?

Plans need to provide for specialist housing for older people where a need exists.

Innovative and diverse housing models will need to be considered where appropriate.

Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.

Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.

- 5.21 The evidence drawn together in the HNA regarding the need for bungalows is centred around the driver of an ageing population, feedback from a single stakeholder and responses from the household survey in the District. This survey is unavailable and therefore I have not had the opportunity to review it. There is no evidence provided by the Council as to why bungalows should form part of a specific housing mix, other than they might be preferable to older persons. However, the need for older persons is covered in section 4. It is clear that meeting the needs of older persons goes beyond potentially providing bungalows, indeed most respondents to the survey would prefer to stay in their current homes rather than move.
- 5.22 Within the Key Strategic messages (paragraph 6.23, page 122) it is difficult to understand

how the increase of bungalows within the general housing market will meet the needs of older persons. Bungalows for sale to the general market, are not age restricted and provide no adaptations for older persons, apart from that bedrooms might be on the ground floor, assuming it is not a dorma-bungalow. It is clear there is an ageing population in Newark and Sherwood and that a strategy needs to be developed by the Council to address this particular issue. However, there is no evidence within the HNA or presented by the Council in other documents, which sets out the Council's strategy to meet this specific need. I have considered other documents available from Nottinghamshire County Council, the Adult Social Care Market Position Statement 2019-2021 (CD 7.6) and the Adult Social Care and Public Health Departmental Strategy (CD 7.5). Both documents cover Newark and Sherwood District, as well as the other district and borough Councils of Nottinghamshire. These documents are relatively high level and are not focused on land use planning, however a clear theme runs throughout, which is to support people living in their own homes for longer, to adapt their homes, provide more support in the community and to avoid, where possible, the discharge of older persons to care/nursing homes, instead of their own home. Specific development needs identified are those which can only be delivered as a separate development, such as a care home or retirement / extra care development, and not ad-hoc in other developments.

- 5.23 In my experience of working with local planning authorities, NHS Trusts and CCGs and for specialist providers of older persons accommodation it is important that the overall housing need assessment, or housing strategy and the strategy for adult social care come together to form a strategy which can be implemented to deliver and meet older persons needs. This is because the needs of older persons are quite diverse. One end of the spectrum is that older people (65+) will not need any specialist care and will continue to live at home for a long time, this is because they do not have any long term health issues or disabilities. The other end of the spectrum is that older people will require specialist nursing accommodation, which can only be provided for in a specialist development. In between this, there are a range of options, from home adaptations, moving to specialist retirement developments/villages or living in a care home. As the 2020 HNA identifies and in my experience is typical across England, most older people do not want to move home and that adaptations, not the delivery of specific housing types, is the most suitable way to meet most older persons needs. The HNA's recommendation to increase the delivery of bungalows is ill-informed and misses the mark of how to meet the housing needs of older people. Building general market bungalows does not guarantee they will be occupied by older persons and furthermore there is no rationale that a bungalow, by virtue of being a bungalow, can meet any specialist need or be more adaptable than a house. The types of development which can achieve this, are those which I have identified in Bilsthorpe at Scholars Close which are meeting specific housing needs for specific households.

vi) Evidence to Support the Need for 1 and 2 bed houses and flats

- 5.24 As set out in table 5.12, page 166 of the 2020 HNA there is no market need for 1 or 2 bedroom houses in the Sherwood sub-area, and slight a market need of 1.1% for 2 + bedroom flats. For affordable needs there is a need for 42.5% affordable rent and 6% intermediate for 1 to 2 bedroom houses, for 2+ bedroom flats there is no affordable rent need and a slight need of 0.4% for intermediate products. For 1 bedroomed flats there is a 4.3% market need and a 6.5% affordable rent need. This shows low levels of need for small bedroomed properties, apart from 1 to 2 bedroom houses.
- 5.25 Looking at the analysis of these priorities for the sub-area of the 3 different scenarios in appendix D, summarised in figure D.2, page 152 of the HNA, it would appear the biggest group for change in smaller developments, is for older persons aged 60+. When looking at the aspiration and expectation scenarios, the overall percentage change for small houses

and flats is very small or negative, but in the demographic scenario the change is mostly small and positive. I consider that my conclusions in v) above can be referenced for the needs of smaller properties. It would appear that the driver is a demographic change, more older persons, which has been left in isolation and existing trends rolled forward, rather than considering strategically how older persons needs are met.

vii) Working from Home and impact upon housing demand and aspirations

- 5.26 It is clear that COVID-19 has necessitated a large shift in the amount of home working. This change in working practices could have a significant impact on the demand and aspirations for house types across England. This particular issue has not been considered in the 2020 HNA and how it will impact on the demand for larger properties. In appendix 1 I have examined the trends nationally for home working in the UK.
- 5.27 I consider that to facilitate working from home practices, even at lower levels than experienced during the Covid-19 pandemic, then it would be necessary to make space available in workers homes to do this. To sustain higher levels of and pre-pandemic homeworking, I consider one way this can be achieved is for people to move to a new house which is bigger than their defined basic need.
- 5.28 I consider this to be additional justification to provide more larger bedroom properties in the district.

viii) Robustness of the methodology

- 5.29 The HNA (2020) was partly informed by a household survey of a random sample of 13,266 households (approximately 25% of the District total) undertaken in 2020. 2,143 surveys were completed, of which 223 were from Sherwood sub-area, representing 2.13% of all households in this sub-area (HNA 2020, p.125, Table 8.1). It is unclear what proportion, if any, of these completed surveys were from households within Bilsthorpe Parish.
- 5.30 Appendix B of the HNA sets out the weighting and grossing process used in the data analysis; however, it is not clear how this has been carried out. The process is not transparent. Whilst paragraph B5 says the assessment is sufficiently statistically robust, it is not possible for this to be checked by one else.
- 5.31 As set out elsewhere in my proof, the level of stakeholder engagement with the house building industry I consider has been low. Appendix E states that only 1 registered provider responded and only 1 house builder responded to the stakeholder questionnaires. It is not clear how much stakeholder engagement has influenced the HNA's recommendations to the Council. However, I would be cautious of basing recommendations on such a low response rate.
- 5.32 Ultimately the HNA has not been tested at a local plan examination, where such questions would be explored in detail to ascertain how robust the conclusions of the work are. Therefore, the fact this work has not been tested at examination should be taken into consideration by the Inspector.

6.0 CONTEXT OF HOUSING IN BILSTHORPE – LOCAL HOUSING NEED

a) Existing Housing Stock by Dwelling Type

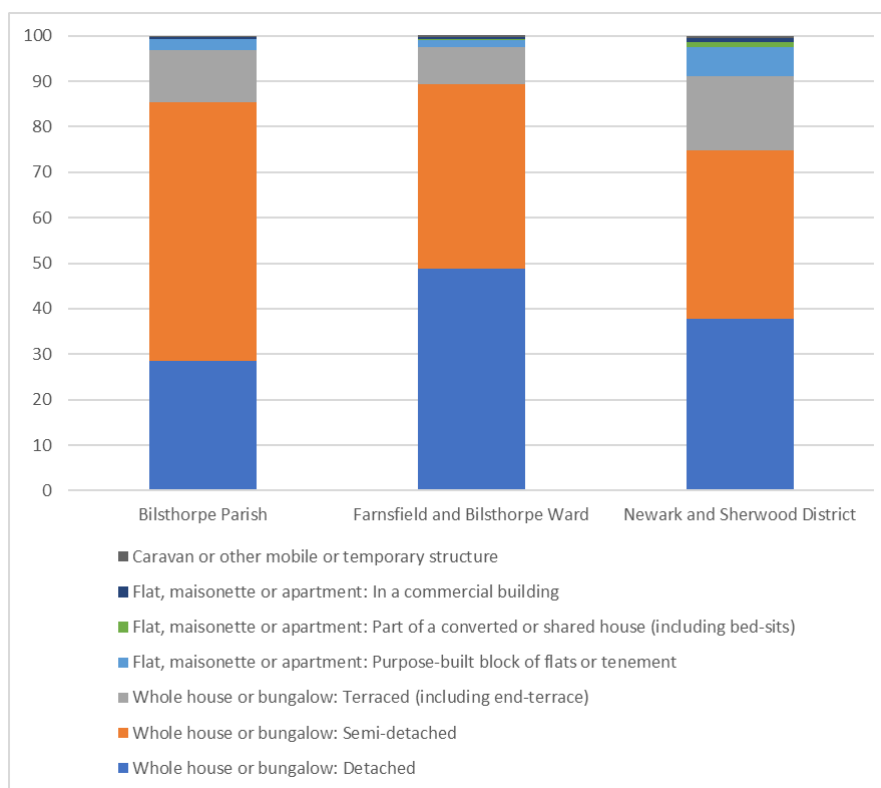
6.1 The following Table 4 and Figure 1 show the breakdown of existing housing stock in Bilsthorpe Parish, by type, compared to the wider Farnsfield & Bilsthorpe ward and Newark & Sherwood District averages. A breakdown of dwelling type by 'houses' and 'bungalows' is not available in the Census data.

Table 4. Housing Stock by Dwelling Type (Parish, Ward and District)

Dwelling Type	Bilsthorpe Parish		Farnsfield and Bilsthorpe Ward		Newark and Sherwood District	
	number	%	number	%	number	%
Whole house or bungalow: Detached	417	28.5	1,743	48.9	19,198	37.7
Whole house or bungalow: Semi-detached	832	56.9	1,445	40.5	18,866	37.0
Whole house or bungalow: Terraced (including end-terrace)	166	11.4	289	8.1	8,394	16.5
Whole house or bungalow: Total	1,415	97	3,477	98	46,458	91
Flat, maisonette or apartment: Purpose-built block of flats or tenement	35	2.4	53	1.5	3,216	6.3
Flat, maisonette or apartment: Part of a converted or shared house (including bed-sits)	1	0.1	12	0.3	632	1.2
Flat, maisonette or apartment: In a commercial building	8	0.5	17	0.5	350	0.7
Flat, maisonette or apartment: Total	44	3	82	2	4,198	8
Caravan or other mobile or temporary structure	3	0.2	9	0.3	299	0.6
All categories: Dwelling type	1,462	100.0	3,568	100.0	50,936	100.0

Source: Census 2011

Figure 1. Housing Stock by Parish, Ward and District (%)



6.2 This data shows that the majority of the existing housing stock in Bilsthorpe Parish (97%) is houses and bungalows, with the remainder (3%) being flats, maisonettes, and apartments. This is higher than the proportion of houses and bungalows across Newark and Sherwood District as a whole (91%). As expected, the number of flats is lower, as typically these are located in more urbanised and main settlements, such as Newark and most of the housing stock in Bilsthorpe is affordable, lower cost family housing a legacy of the coal mining industry.

b) Existing Housing Stock by Number of Bedrooms

6.3 Table 5 and Figure 2 below show the housing stock of Bilsthorpe Parish by bedroom size, compared to Farnsfield and Bilsthorpe Ward and the wider District.

6.4 This data illustrates that the majority of the existing housing stock in Bilsthorpe Parish is 3 bedroom dwellings (60%), followed by 2 bedrooms (20%), 4+ bedrooms (16%) and 1 bedroom (3%).

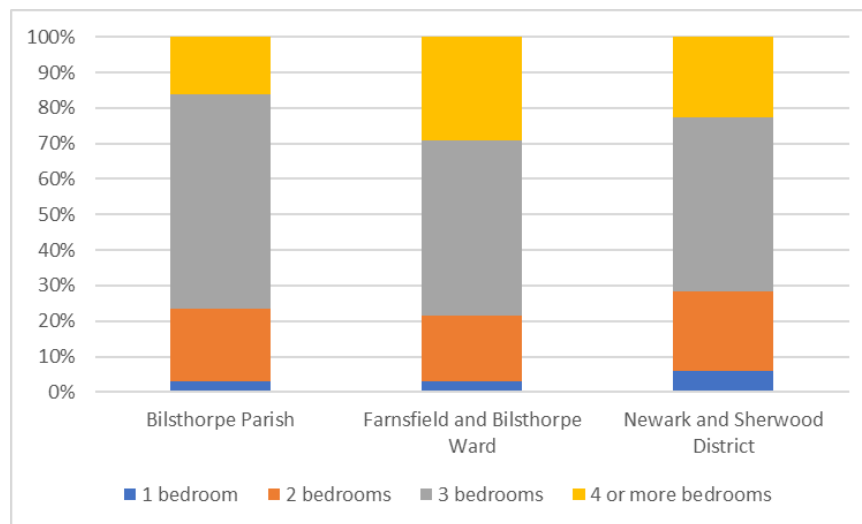
6.5 The proportion of 3 bedroom dwellings in Bilsthorpe Parish (60%) is higher than the equivalent figure in the wider Ward and District (both 49%). The proportion of 1 and 2 bedroom dwellings in Bilsthorpe Parish is broadly in line with figures for the wider Ward and District. However, the number of dwellings in Bilsthorpe Parish with 4+ bedrooms (16%) is lower than the equivalent figure for the Ward (29%) and District (23%). Again, as above, the housing stock is a legacy of the coal mining industry, expressed in table 5 by the high proportion of 3 bedroom homes.

Table 5. Housing Stock by Number of Bedrooms (Parish, Ward and District)

Bedrooms	Bilsthorpe Parish		Farnsfield and Bilsthorpe Ward		Newark and Sherwood District	
1 bedroom	41	3%	99	3%	2,838	6%
2 bedrooms	286	20%	638	19%	10,971	22%
3 bedrooms	844	60%	1,699	49%	23,886	49%
4 or more bedrooms	226	16%	997	29%	11,078	23%
Total	1,397	100%	3,433	100%	48,773	100%

Source: Census 2011

Figure 2. Housing Stock by Number of Bedrooms (Parish, Ward and District) (%)



c) Recent Completions and Sales

- 6.6 New build transaction data from Land Registry reveals a total of six new build property sales in Bilsthorpe Parish in the last five years (March 2016 to March 2021). Details of these transactions are listed in Table 6 below. These are corroborated with the Building Control record 16/03333/PAS for 6 plots.

Table 6. New Build Transactions in Bilsthorpe Parish (March 2016 – March 2021)

Address	Planning Ref.	Dwelling Type	Bedrooms	Transaction Date
The Larches, Eakring Road, Bilsthorpe, NG22 8PY	14/01883/FUL	Detached bungalow	2 x 2-beds 4 x 3-beds	21/09/2017
1 Goodman Close, Bilsthorpe, NG22 8UJ	14/01883/FUL	Detached bungalow		02/05/2017
2 Goodman Close, Bilsthorpe, NG22 8UJ	14/01883/FUL	Detached bungalow		12/05/2017
3 Goodman Close, Bilsthorpe, NG22 8UJ	14/01883/FUL	Detached bungalow		30/05/2017
4 Goodman Close, Bilsthorpe, NG22 8UJ	14/01883/FUL	Detached bungalow		09/06/2017
5 Goodman Close, Bilsthorpe, NG22 8UJ	14/01883/FUL	Detached bungalow		01/08/2017

Source: HM Land Registry Open Data

- 6.7 In addition to these 6 plots, I have identified an additional 7 new builds at Scholars Way (off Church Street)³. These are all bungalows, 6 two beds and 1 one bed. This illustrates that all recorded new build dwellings sold in Bilsthorpe in the past five years were 1, 2 and 3-bed bungalows. From HM Land Registry and Building Control Records, there are no details of new build family housing has been sold in Bilsthorpe in the last five years.
- 6.8 The Housing Monitoring and 5 Year Land Supply Reports identify 30 completions in Bilsthorpe Parish in the last five years. It has not been possible to find these completions on the Building Control records or within the HM Land Registry. Unfortunately, there are no planning application details in the Council's monitoring report which detail which permissions relate to completions. Because of this I cannot confirm what the missing 17 dwellings are or if they have been sold.
- 6.9 Through this analysis it confirms that within Bilsthorpe Parish in the last 5 years, there have been at least 13 new bungalows built and sold (43%), out of a total possible 30 completions. Comparing this back to the 2020 HNA, this exceeds expectations.
- 6.10 As I had previously referenced in section 5 It is typical for specialist housing to be developed by specialist providers. The scheme for 7 bungalows at Scholars way was developed by Minster Developments Ltd who specialised in affordable housing and care facilities. The 6 plots on Goodman Close were developed by Rippon Homes Ltd, this proposal was allowed by appeal. I understand the reason for providing bungalows on site was because of site specific design characteristics. It is my understanding the Rippon Homes development was for general market sale.

³ 15/02022/FUL

Table 7. New Build Completions in Bilsthorpe Parish (31st March 2016 – 31st March 2020)

Monitoring Year	New Build Completions
1st April 2019 to 31st March 2020	3
1st April 2018 to 31st March 2019	6
1st April 2017 to 31st March 2018	7
1st April 2016 to 31st March 2017	12
1st April 2015 to 31st March 2016	2
Total	30

Source: Housing Monitoring and 5 Year Land Supply Reports 2015 – 2020

d) Emerging Housing Stock

6.11 The Housing Monitoring and 5 Year Land Supply Report (2020) identifies a total of 218 dwelling commitments in Bilsthorpe Parish as at 1st April 2020. These are all new build developments and are detailed in Table 8 below.

6.12 I have updated the Council's monitoring information through a review of the Newark and Sherwood online planning application database. This reveals 17 additional dwellings permitted in Bilsthorpe Parish during the period 2nd April 2020 to 26th March 2021. These are all new build developments and have also been added to the table below.

Table 8. Planning Commitments in Bilsthorpe Parish as at 26th March 2021

Street	Site Ref	Net Total Dwellings	App Type	Site Status	Dwelling Type
Eakring Road (Field ref' no' 7108)	17/01139/OUT	85	Outline	Not yet started	This is the previously consented application on the appeal site so has been excluded from this analysis as it would be superseded by the current appeal development.
Farnsfield Road (Rose Cottage)	19/00331/OUT / 19/02269/RMA	6	Outline	Not yet started	2 x 2-bed dormer bungalows 1 x 2-bed house 2 x 3-bed houses 1 x 4-bed house
Farnsfield Road (White Cottage) front	17/00665/FUL	1	Detailed	Not yet started	1 x 3-bed house
Farnsfield Road (White Cottage) rear	17/00596/FUL	1	Detailed	Not yet started	1 x 3-bed house
Kirklington Road (23, Land at)	19/00754/FUL	1	Detailed	Not yet started	1 x 3-bed house

Oaktree Drive (31, Milfield)	18/00215/FUL	1	Detailed	Under construction	1 x 3-bed bungalow
Oldbridge Way (Land at)	19/00491/FUL	3	Detailed	Not yet started	3 x 3-bed houses
Oldbridge Way (Land at)	20/00642/FULM (Replacement scheme for 16/01618/OUTM / 18/01971/RMAM)	120	Detailed	Not yet started	25 x 2-bed houses 73 x 3-bed houses 22 x 4-bed houses
The Crescent	05/00775/FULM	7	Detailed	Under construction	7 x 1-bed flats
6 Oldbridge Way	20/02430/FUL	1	Detailed	Not yet started	1 x 1-bed house
Land at Eastwell Court	21/00159/FUL	9	Detailed	Not yet started	4 x 1-bed flats (two of which are ground floor) 5 x 2-bed houses
Total		235			

Source: *Housing Monitoring and 5 Year Land Supply Report (2020, p.27)*, *Five Year Land Supply Statement (as at 1st April 2020)*, Newark and Sherwood online planning application database

6.13 The housing mix of the existing commitments shown in the above table are summarised in Table 9 below.

Table 9. Summary of Dwelling Commitments in Bilsthorpe Parish by Housing Mix and Type

Dwelling Type	Commitments (Number of Units with Extant Permission)	Percentage of total dwellings
1-bed flat	11	
Total Flats	11	7%
2-bed bungalow	2	
3-bed bungalow	1	
Total Bungalows	3	2%
1-bed house	1	
2-bed house	31	
3-bed house	82	
4-bed house	23	
Total Houses	137	91%
TOTAL	151	

6.14 This illustrates that only 15% of dwelling commitments in Bilsthorpe Parish are 4-bed houses, which is lower than the sub-area requirement for Sherwood of 35.8% as identified in the HNA (2020) (see Section 7 below). There is therefore an unmet need for 4-bedroom properties within Bilsthorpe.

6.15 With respect to provision of bungalows, whilst only 3% of existing dwelling commitments in

Bilsthorpe Parish are for bungalows, when factoring in the recent 30 total completions for Bilsthorpe, the total percentage of bungalows increases to just under 9% (16 bungalows from 181 dwellings).

6.16 The number of 3-bed dwellings within the committed supply (55%) illustrates that there is a continuing demand for these properties within Bilsthorpe Parish, permitted by the Council.

6.17 It is notable that planning permission ref. 20/00642/FULM involved the removal of 6no. bungalows from the scheme previously approved on the same site under permissions ref. 16/01618/OUTM and 18/01971/RMAM. The Officer's report (CD 7.8) for permission reference. 20/00642/FULM, which was approved on 1st July 2020, states in respect of the assessment of the proposed housing mix on the site:

*"It is difficult to be overly prescriptive to the 2014 [Housing Market and Needs Assessment] survey given that this is now almost 6 years old and due to be updated imminently. **However, of more relevance to the current assessment is the type of product that would be delivered. Gleeson are a national housebuilder who rely on specific product delivery (which continues to be successful in the market). One of the key characteristics of their product is house types which are modest in size (as discussed further below). There is therefore a case to be made that a Gleeson 3 bed dwelling would still be suited (and affordable) to someone in the market for an average 2 bed dwelling. In this respect, an apparent over-reliance on 3 bed units as identified above is not considered fatal to the scheme to a degree that it would justify refusal.**" (emphasis added)*

6.18 This same justification used by the case officer in that decision can be applied to the appeal proposal, in which the case officer's point that the appeal proposal includes a 'predominance' of 3-bed houses should not be sufficient to justify refusal. In addition, under this logic it can be argued that the 3-bed dwellings included in the appeal scheme may also be suitable for people who may usually only be able to afford 2-bed dwellings. I consider that it is appropriate to apply the same judgement on mix the case officer has taken in the Gleeson scheme to the Keepmoat scheme. This is because both housebuilders' products are aimed at households seeking more affordable market housing, typically first time buyers and families needing more space.

6.19 There was also notably no reference made in the Officer's report (application ref. 20/00642/FULM) to the fact that bungalows no longer formed part of the revised development scheme or that no bungalows were provided within the proposed housing mix. This is inconsistent with the arguments that are now being applied to the current appeal by the Council.

7.0 THE KEEPMOAT PROPOSAL

- 7.1 As set out in the Appellant's Statement of Case (CD 6.4), paragraphs 6.40 to 6.45 and tables 1, 2 and 3 (pages 25 to 27), the Council had previously accepted the housing mix for the outline application on this site, when the 2014 study was their most up to date evidence at the district level. The indicative mix, in terms of percentage per dwellings size, in the outline and the mix in the application scheme (which is now the subject of this appeal) are broadly the same. Table 1, page 25 of the appellant's Statement of Case, shows 10.5% are 2 beds, 56% 3 bed, 32% 4 bed and 1% 5 bed. There are now no 5 bed homes in the appeal scheme.
- 7.2 The proposed development seeks permission for 103 residential units with the unit mix identified in Table 10 below.

Table 10. Housing Mix of Proposed Development

Number of Beds	Affordable Units	%	Market Units	%	Total Units	%
1	0	0%	0	0%	0	0%
2	10	100%	0	0%	10	10%
3	0	0%	58	62%	58	56%
4	0	0%	35	38%	35	34%
Total	10	100%	93	100%	103	100%

- 7.3 Table 11 below illustrates how the total unit mix of the proposed development compares with the dwelling type and number of bedroom housing mix requirements set out in the HNA (2020) at both the district and sub-area level.

Table 11. Housing Mix of Proposed Development compared with District-level and Sherwood Sub-Area Dwelling Type and Bedroom Number Housing Mix Requirement set out in HNA (2020)

Unit Type	All Units (%)				
	Proposed Scheme (%)	HNA (2020) District-level requirement (%)	Difference compared with proposed scheme (%)	HNA (2020) Sherwood sub-area requirement (%)	Difference compared with proposed scheme (%)
1 or 2-bed house	10	5.6	4.4	15.5	-5.5
3-bed house	56	39.9	16.1	20.2	35.8
4 or more bed house	34	10.4	23.6	35.8	-1.8
1-bedroom flat	0	7.0	-7.0	0.0	0.0
2 or more-bedroom flat	0	2.7	-2.7	1.2	-1.2
1-bedroom bungalow	0	0.0	0.0	0.0	0.0
2-bedroom bungalow	0	22.2	-22.2	14.4	-14.4
3 or more-bedroom bungalow	0	11.2	-11.2	12.9	-12.9
Other	0	1.1	-1.1	0.0	0.0

Source: HNA (2020) (including Sub-Area Summaries) and SPRU analysis

- 7.4 The Council's decision notice states that the 'skew towards larger units (in terms of number of bedrooms) fails to represent the preferences of the latest District wide housing needs evidence'. However, as illustrated in Table 11 above, the distribution of units in terms of

number of bedrooms is only marginally different to that proposed in the appeal scheme. As set out in Section 6 above (paragraphs 6.17 to 6.18) in applying Core Policy 3 the Council have previously concluded that larger size dwellings may still be suitable for meeting the needs of people looking for smaller dwellings. Therefore, the fact that the appeal scheme proposes a higher proportion of 3-bedroom dwellings compared to the proportion identified as being required in the HNA (2020) should not be considered a valid reason for refusal.

- 7.5 In respect of 4-bed dwellings, the need identified in the Council's evidence (HNA, 2020) for larger dwellings of this size is not currently being met in Bilsthorpe, as discussed in paragraph 6.14 above. Therefore, the Council's reason for refusal that by providing a significant proportion of larger-size dwellings the scheme fails to meet an identified local need is not correct as the evidence suggests there is an unmet need for 4-bed dwellings. The Council's HNA (2020) shows an overall housing requirement in Sherwood sub-area for 4-bed dwellings of 35.8%.
- 7.6 Notwithstanding that the Council's reasons for refusal do not refer to dwelling type (only to the numbers of bedrooms proposed), it is also noted that whilst there is a purported identified need for bungalows in Sherwood sub-district as outlined in the HNA (2020), there is also a significant need for family sized housing, which would be delivered by the appeal proposals. As outlined in Table 6 of Section 6, all recorded new build transactions in Bilsthorpe Parish in the last five years were detached bungalows, at least 43% of new bulids, indicating that this need is at least in part being met. The lack of family housing new build transactions in recent years further indicates that this need is not currently being met.
- 7.7 The Council's Statement of Case (paragraph 4.32) states "*A mix which better reflects the local housing requirements would replace some of the three bedroom houses with 2 bedroom bungalows and 1 bedroom flats*". However, the need for 1 bedroom flats (0%) and 2 bedroom bungalows (14.4%) in Sherwood sub-area as a proportion of all dwellings required, is minimal compared to the need for family sized 3 and 4 bedroom houses (56%) as shown in the HNA (2020) (see Table 11 above). Therefore, the appeal development contributes towards meeting the identified local need for young people, first time buyers and family sized housing.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 The appeal is made by Keepmoat Homes Ltd against the decision of Newark and Sherwood District Council to refuse a planning application for up a residential development of 103 dwellings and associated access and infrastructure on Field Reference Number 7108, Eakring Road, Bilsthorpe.
- 8.2 As set out in the Appellant's Statement of Case (CD 6.4), paragraphs 6.40 to 6.45 and tables 1, 2 and 3 (pages 25 to 27), the Council had previously accepted the housing mix for the outline application on this site, when the 2014 study was their most up to date evidence at the district level. The indicative mix, in terms of percentage per dwellings size, in the outline and the mix in the application scheme (which is now the subject of this appeal) are broadly the same.
- 8.3 The Council's extant policy on housing mix is Core Policy 3 (CD5.12) 'Housing Mix, Type and Density' of the Amended Core Strategy (CD5.5) adopted March 2019).
- 8.4 The Council's most recently published evidence on housing need (including recommendations for dwelling type and mix at a district and sub-area level) is set out in the Housing Needs Assessment (HNA) prepared by arc4 in December 2020 (CD6.20). This evidence did not inform Core Policy 3 of the adopted Core Strategy.
- 8.5 The Council's case is set out in their Statement of Case (CD6.13), of relevance to my proof of evidence, which deals with housing mix, are paragraphs 3.16 to 3.20 (pages 14 to 16) and 4.31 to 4.32 (pages 29 to 30) present the Council's case on this specific matter.
- 8.6 The 2019 National Planning Policy Framework (the Framework) was published on 20th February 2019 and came into force with immediate effect. Local planning authorities are required to ensure that the needs of different groups with specific housing requirements, such as families with children, are assessed and met through planning policies. Apart from the need to prepare evidence and subsequent planning policies, there is no specific guidance on how these needs should be assessed there is no nationally prescribed housing mix and such matters such be dealt with through a Local Plan.
- 8.7 The Council's most up-to-date policy on housing mix is Core Policy 3 'Housing Mix, Type and Density' (CD 5.12) of the Amended Core Strategy, adopted March 2019 (CD 5.5). This policy has been drafted with the intention of being flexible. I consider the policy is split into two parts, one which is relevant to decision taking and one which is more strategic in nature. The decision taking element specifies what information is relevant to making that decision, the strategic part gives an indication to the types of housing to be built within the plan period, it does not specific a mix for each proposal.
- 8.8 Based on the Council's monitoring data I consider that some of the housing needs are being met, as identified by the 2020 HNA. However, this is meeting the need of 1-2 sized bed properties and not needs in 3 bed or 4 + bed properties.
- 8.9 I do not consider the Council's 2020 HNA is sufficiently justified to set out a specific need for bungalows and for flats for general market sale, whilst there may be justification to provide them on some schemes, there should not be a blanket requirement on each scheme. There is no requirement for house type in the development plan. The impacts and changes to housing demand due to Covid-19 have not been considered in the report. Furthermore, the assessment methodology is not transparent and the HNA has not been tested at a local plan examination, where such questions would be explored in detail to ascertain how robust the conclusions of the work are. Therefore, the fact this work has not been tested at examination should be taken into consideration by the Inspector.
- 8.10 In the last 5 years in Bilsthorpe, at least 45% of new homes built have been bungalows, of

those built at least 7 have been to meet a specific specialist need. Taking existing completions into account and the future supply for Bilsthorpe, bungalows will account for just under 9% of new completions and supply and only 15% of supply will be for 4 bed houses. In respect of 4-bed dwellings, the need identified in the Council's evidence (HNA, 2020) for larger dwellings of this size is not currently being met in Bilsthorpe in completions or future supply.

8.11 The Council's Statement of Case (paragraph 4.32) states "A mix which better reflects the local housing requirements would replace some of the three bedroom houses with 2 bedroom bungalows and 1 bedroom flats". However, the need for 1 bedroom flats (0%) and 2 bedroom bungalows (14.4%) in Sherwood sub-area as a proportion of all dwellings required, is low when compared to the need for family sized 3 and 4 bedroom houses (56%) as shown in the HNA (2020) (see Table 11 above). Therefore, the appeal development contributes towards meeting many of the identified local needs, including for young people, persons in need of affordable two bed homes, first time buyers and family sized housing.

8.12 In summary my response to the Council's case on the specific matter of housing mix, is that:

- a. Amended Core Strategy policy Core Policy 3 does not specify any split in mix for proposed developments, for example 50% should be 4 bedrooms, 50% should be 1 bedroom. Instead, at a strategic level it lists 3 areas of need which housing developments should address: 3+ bedroom housing, 2 bedroom or less houses and housing for elderly and disabled persons.
- b. The policy has no specific requirement for house types, e.g., bungalows, flats or houses.
- c. The policy states that the Council will seek to secure an appropriate mix of housing types to reflect local need. However, the Council do not have an assessment of local need for Bilsthorpe, the only available need assessments are at a district level and a sub-area level.
- d. The policy goes further and states that such a mix will be dependent on local circumstances of the site, the viability of the development and any localised housing need information. Therefore, a proposed development mix will need to be balanced and arrived at using these criteria.
- e. The Housing Need Assessment 2020 prepared by Arc4, did not inform the preparation or examination of Core Policy 3. The 2020 HNA has not been tested at a Local Plan examination, nor does it inform any wider housing, or needs strategy of the Council.
- f. The Amended Core Strategy has no policy to implement the HNA's recommendation to meet the needs of an ageing population as purported in the HNA.
- g. There is no wider housing strategy of the Council, or County Council to meet the needs of an ageing population as purported in the HNA.
- h. The appeal site **will assist** with Core Policy 3 to bring forward family housing of 3 bedrooms or more.
- i. The appeal site **will assist** with Core Policy 3 to bring forward smaller houses of 2 or less. In addition, as identified in the HNA 2020 and in the Council's Statement of Case, these will be affordable units.

8.13 Council's reason for refusal regarding housing mix is still not justified and I consider that the mix of the appeal site **does meet** housing needs and crucially is in accordance with Core Policy 3.

LIST OF APPENDICES

Appendix 1 Working from Home and Impact Upon Housing Demand and Aspirations

APPENDIX 1 - WORKING FROM HOME AND IMPACT UPON HOUSING DEMAND AND ASPIRATIONS

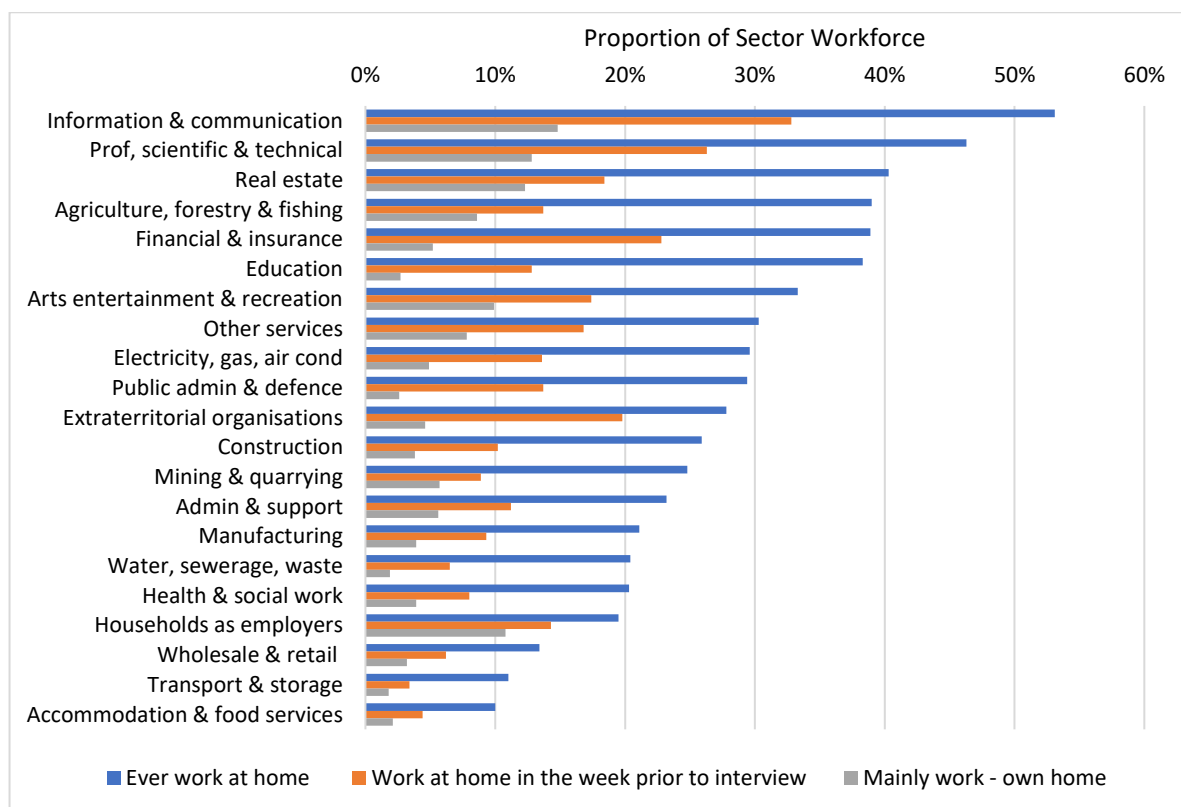
A1.1 It is clear that COVID-19 has necessitated a large shift in the amount of home working in the last 12 months. This change in working practices could have a significant impact on the demand and aspirations for house types across England. This particular issue has not been considered in the 2020 HNA and how it will impact on the demand for larger properties. I have examined the trends nationally for home working in the UK (as set out below) and I consider this relevant evidence to demonstrates a need for houses with more bedrooms.

ix) Working from Home Assessment

A1.2 Figure 3 shows the proportion of home working in different sectors in 2019 and provides a useful baseline position pre-COVID. This shows that pre-COVID working from home was still relatively rare. This shows working from home is most prevalent in the Information and Communications sector, and this sector was the only one where more than half of the workforce (53%) had ever worked from home. Conversely, in the Accommodation and Food Service sector 90% had never worked from home.

A1.3 There is a clear distinction between 'ever worked from home' and 'mainly work from home'. Even in the Information and Communications sector where 53% had ever worked from home, only 14.8% said that was their main working location. This was the highest of any sector. For the majority of sectors less than 5% of workers mainly worked from home.

Figure 3. Percentage of UK workforce homeworking by sector, 2019

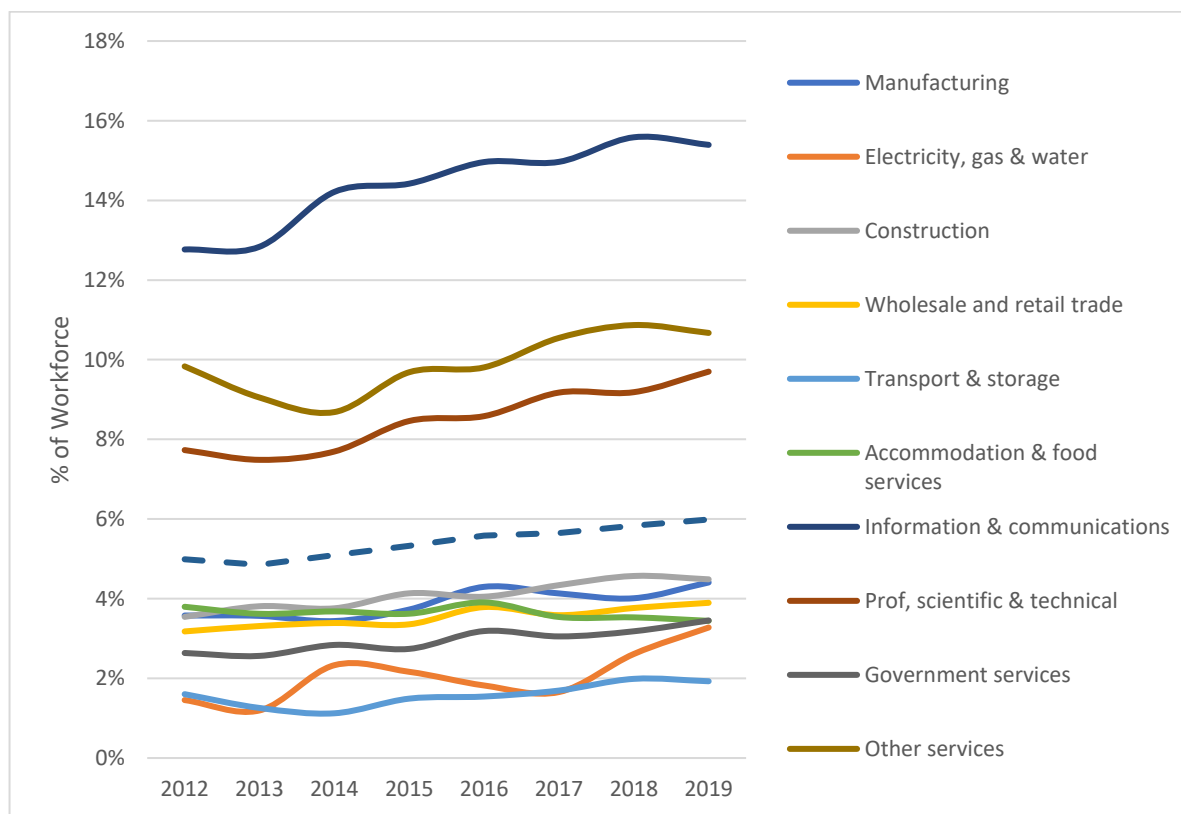


i. Source: ONS

A1.4 Prior to Covid there was a clear upward trend in the proportion of people working from home. ONS's remote working data at a national level shows that from 2012-19 the scale of homeworking – those who mainly work from home – has increased from 5.0% in 2012 to

6.0% in 2019. This ranges by sector, from 1.9% in Transport and Storage to 15.4% in IT and Communications.

Figure 4. Numbers of Homeworkers by Sector, UK



i. Source: ONS

A1.5 The future changes in working from home rates can be estimated by extrapolating the growth trend in home working from 2012-19 into the future. This is done for each sector and results in a total proportion of home working of 9.0% by 2040 – up from 6.0% in 2019. For some sectors this is notably higher – the highest is IT and Communications which grows to 23.3% by 2040. This suggests that the predominantly office-based sectors will be most impacted, which accords with the analysis above.

Table 12. Projected Change in Working from Home per Sector, 2019-40

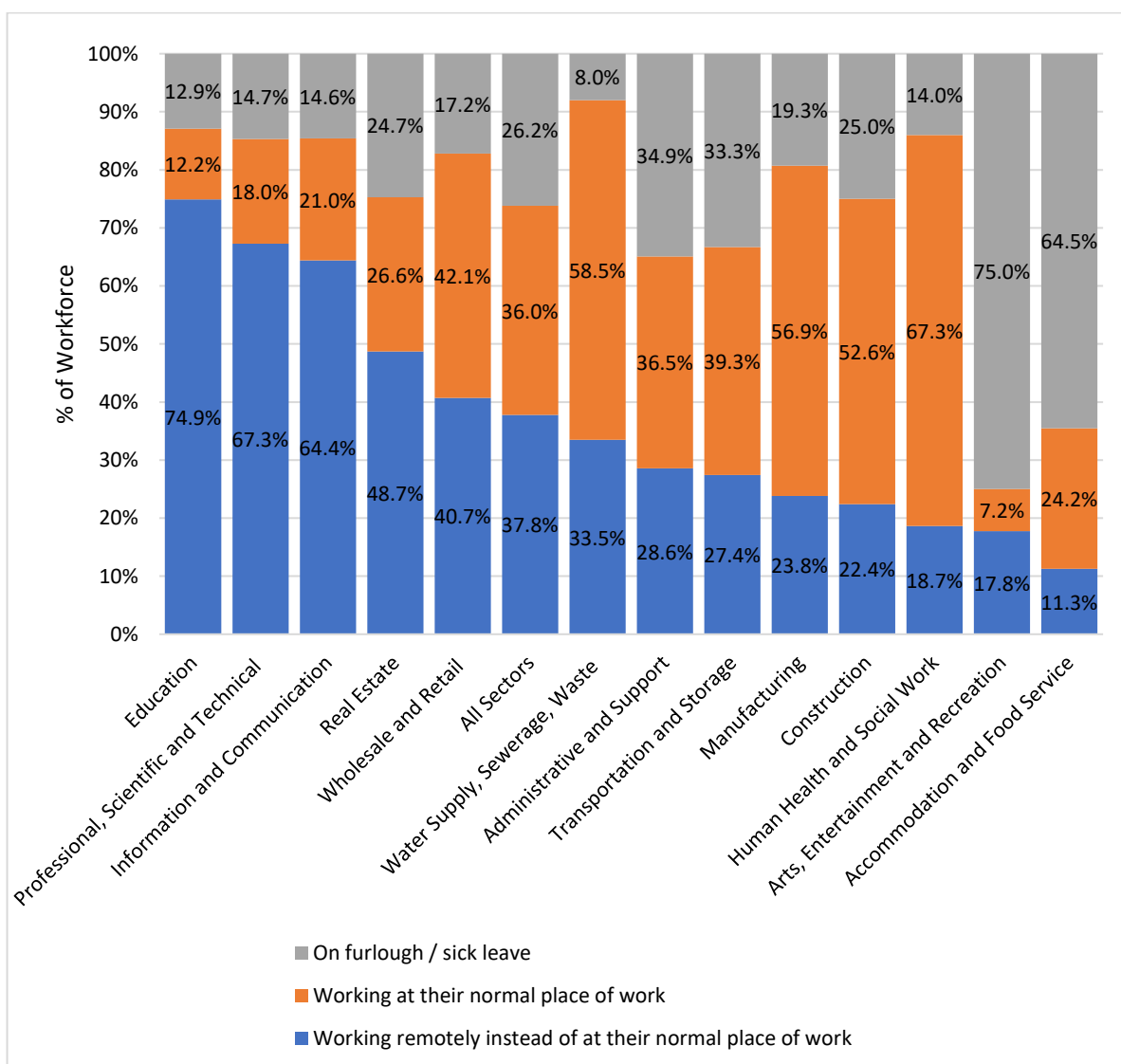
	2019	2040	Change
Manufacturing	4.4%	6.9%	2.5%
Electricity, gas & water	3.3%	8.7%	5.5%
Construction	4.5%	7.3%	2.8%
Wholesale and retail trade	3.9%	6.1%	2.2%
Transport & storage	1.9%	2.9%	1.0%
Accommodation & food services	3.4%	2.4%	-1.1%
Information & communications	15.4%	23.3%	7.9%
Prof, scientific & technical	9.7%	15.6%	5.9%
Government services	3.5%	5.9%	2.4%
Other services	10.7%	13.2%	2.5%

All Jobs	6.0%	9.0%	3.0%
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A1.6 The lockdown restrictions due to COVID-19 have affected different sectors to different degrees, depending largely on the nature of work and whether it is possible for normal work tasks to be completed whilst working from home. This has driven many companies to update their operating practices and computer hardware/software in order to facilitate longer-term home working. This has no doubt increased the capacity for homeworking for a number of businesses. The lockdown has also necessitated a change in business culture with regards to home working, for example a greater number of business meetings taking place online rather than face to face.

A1.7 The Business Impact of Coronavirus (COVID-19) Survey (BICS) data from ONS provides an indication of how this situation has changed since lockdown restrictions came into place. This shows the level of home working achieved for each sector during lockdown.

Work location of workforce by sector, June 2020

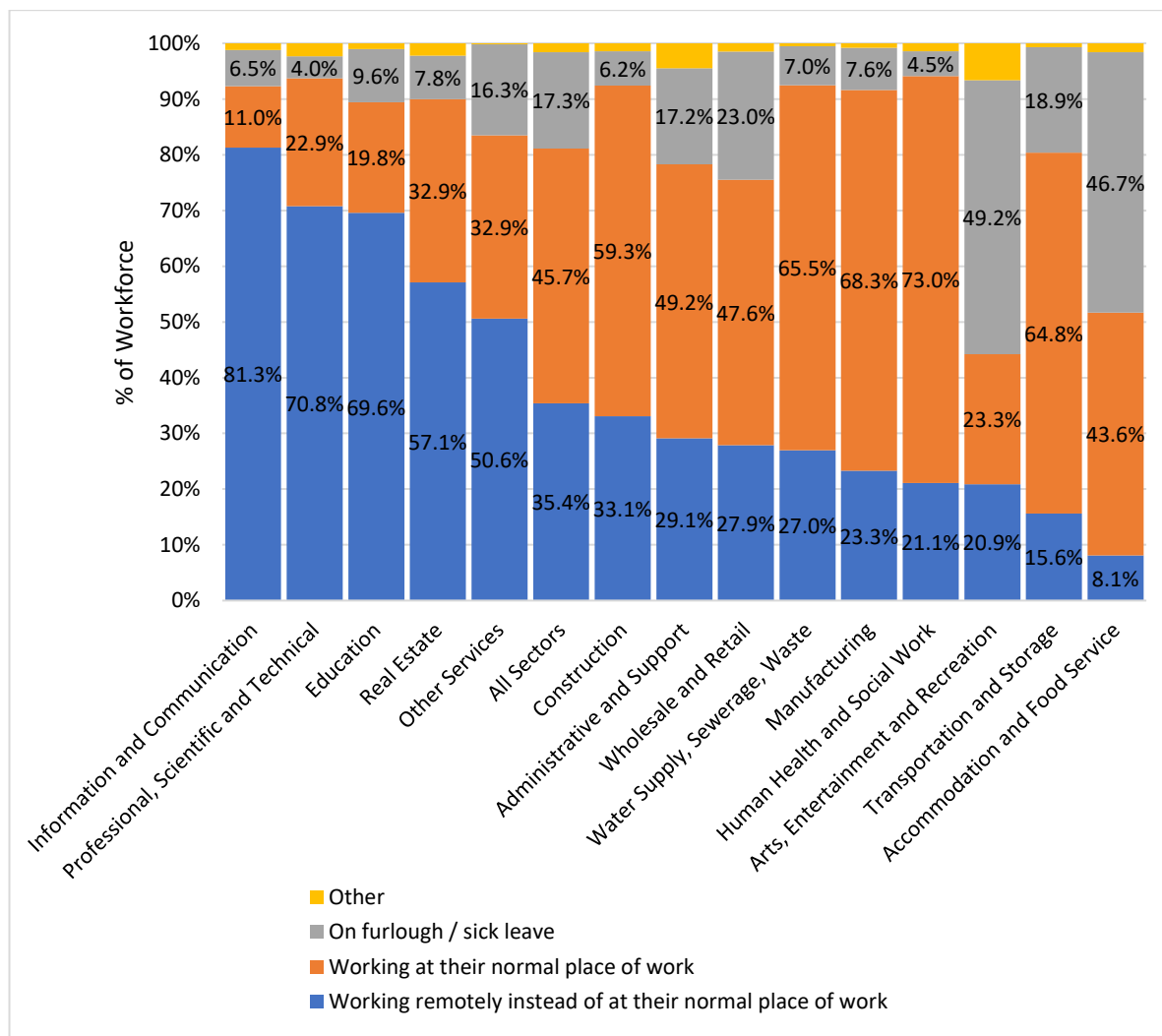


ii. ONS BICS June 2020

A1.8 The figure below shows similar data from February 2021. This data is taken from the

Business Insights and Impact on the UK Economy dataset produced by ONS which supersedes the BICS. This provides an update to the figures from the remote working figures from summer 2020 and shows a broadly similar level of remote working for the majority of sectors.

Figure 5. Work location of workforce by sector, February 2021



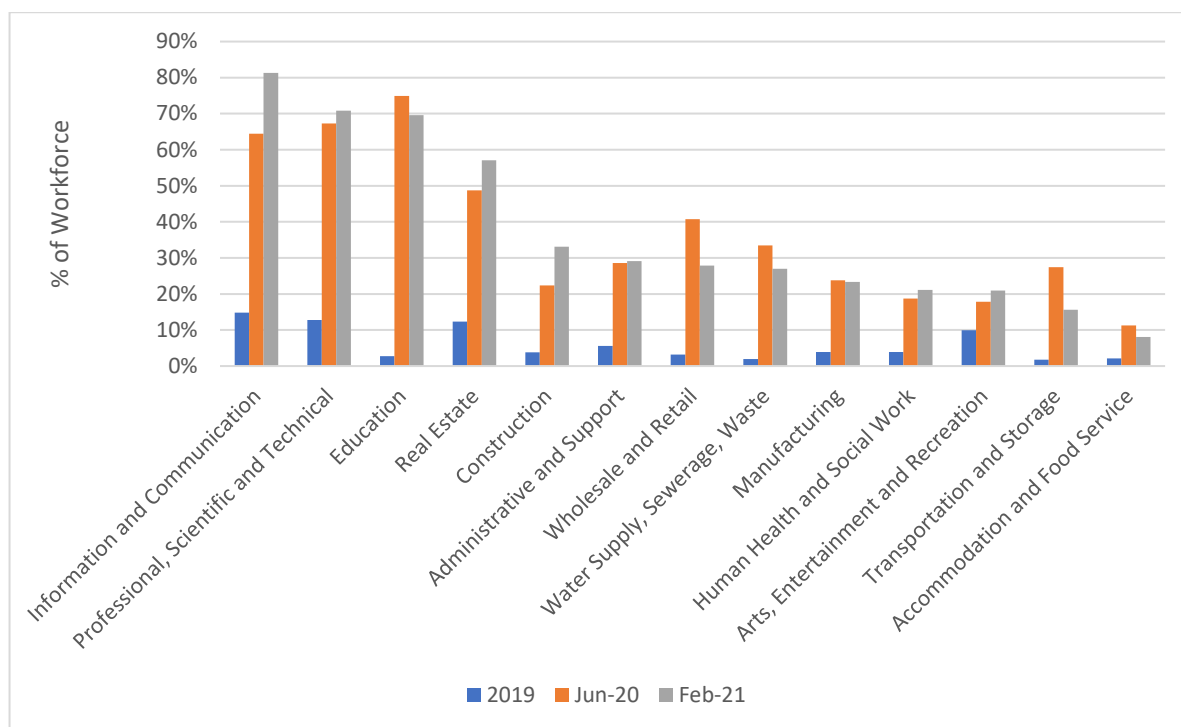
i. *ONS Business insights and impact on the UK economy March 2021*

A1.9 Figure 6 compares the pre-COVID and post-lockdown remote working figures from summer 2020 and spring 2021. This shows the increase in home working in each sector. It is clear from the data that sectors with high levels of office-based activities have seen particularly high levels of remote working, and large increases from the rates of home working seen pre-lockdown:

- Professional, Scientific and Technical Services increasing from 12.8% to 67.3%.
- Information and Communications increasing from 14.8% to 64.4%; and
- Real Estate from 12.3% to 48.7%.

A1.10 The data provides a reasonable estimate for the capacity for home working in each sector. In this sense it provides a reasonable 'upper bound' of the potential for home working in each sector.

Figure 6. Remote working by sector, 2019 vs June 2020 vs February 2021



i. Source: SPRU analysis of various ONS data

- A1.11 Whether these are long term changes to working practices remains to be seen. Going forward, as lockdown restrictions are eased, the 'new normal' is unlikely to see a continuation of this level of home working but equally it is unlikely to drop back to pre-COVID levels.
- A1.12 For some sectors – for example Education, which has seen one of the highest increases – the levels of remote working have been a requirement due to the closure of education establishments. These are very likely to drop significantly towards pre-COVID levels once these establishments are re-opened. Impacts for these will likely to be relatively short-term.
- A1.13 However, it is clear that the lockdown has required an unprecedented level of home working which has demonstrated that it is a viable option for many and has removed many of the barriers to home working such as technology and corporate culture. Many of the barriers to home working being overcome out of necessity such as:
- Technological barriers
 - Corporate attitudes towards homeworking and fears about reduced productivity
 - Limitations on teamworking, training, and client facing.
- A1.14 The table below summarises the current level of working from home for each broad sector, the increase if the pre-COVID growth rate were to continue, and the 'upper limit' of home working achieved during lockdown.
- A1.15 While it is unlikely that the remote working patterns which have arisen as a result of COVID will pertain long-term, they do demonstrate that the rate of continued growth in the level of home working is easily achievable. Indeed, in light of the rates of home working seen post-COVID this level of growth in home working appears to be conservative.
- A1.16 This notwithstanding, even the continuation of the pre-covid trend shows a considerable increase in the levels of home working – increasing by 50% by 2040.

Figure 7. Comparison of Working from Home Patterns

	2019 – pre-Covid	2040 – Continuation of pre-Covid Trend	Covid Lockdown Peak
Manufacturing	4.4%	6.9%	23.8%
Electricity, gas & water	3.3%	8.7%	33.5%
Construction	4.5%	7.3%	33.1%
Wholesale and retail trade	3.9%	6.1%	40.7%
Transport & storage	1.9%	2.9%	27.4%
Accommodation & food services	3.4%	2.4%	11.3%
Information & communications	15.4%	23.3%	81.3%
Prof, scientific & technical	9.7%	15.6%	70.8%
Education	0.8%	3.5%	74.9%
Health	0.6%	2.3%	21.1%

A1.17 I consider that to facilitate working from home practices, even at lower levels than experienced during the Covid-19 pandemic, then it would be necessary to make space available in workers homes to do this. To achieve this, I consider one way this can be achieved is for people to move to a new house which is bigger than their defined need.

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