Proof of Evidence

Appeal Site:

Land off Eakring Road, Bilsthorpe, Nottinghamshire

NG22 8PZ

APPEAL REF: APP/B3030/W/20/3265876

March 2021

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Please note that in this report some of the tables include rounded figures. This can result in some column or row totals not adding up to 100 or to the anticipated row or column 'total' due to the use of rounded decimal figures. We include this description here as it covers all tables and associated textual commentary included. If tables or figures are to be used in-house then we recommend the addition of a similarly worded statement being included as a note to each table used.

1. Introduction

1.1   This proof of evidence has been prepared by Dr Michael Bullock, Managing Director of arc4 Ltd. I hold a BSc(Hons) and PhD in Geography, both from Lancaster University. I have over 24 years' housing research experience and I am a Member of the Market Research Society and a Member of the Chartered Institute of Housing.

1.2   arc4 has prepared a comprehensive 2020 district-wide housing needs assessment for Newark and Sherwood District Council (2020 HNA). This provides up to date evidence to inform strategies, policies and decisions of the council and its partners. It included an assessment of overall housing need, future dwelling mix, affordable need, and the housing need of different groups including older people and those with additional needs. The HNA included a questionnaire which was sent to a random sample of 13,266 households and 2,143 responses were achieved (a 16.2% response rate and a district-level sample error of +/-2.1%).

1.3   The 2020 HNA took into account the requirements of the National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance.

1.4   NPPF paragraphs 60 to 62 relate to the evidence base requirements which underpin this study:

Paragraph 60: 'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need Figure, 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.'

Paragraph 61: 'the size, type and tenure of housing need for different groups in the community, should be assessed and reflected in planning policies including but not limited to:

- *those who require affordable housing;*

- *families with children;*

- *older people;*

- *students;*

- *people with disabilities;*

- *service families;*

- *travellers;*

- *people who rent their homes; and*

- *people wishing to commission or build their own homes.'*

Paragraph 62: 'where a need for affordable housing is identified, planning policies should specify the type of affordable housing required'

1.5   This proof of evidence focuses on affordable housing need, the needs of additional groups with specific reference to older people and the need for adapted dwellings and the dwelling mix evidenced in the 2020 HNA. This evidence helps to determine the dwelling type and mix appropriate for the proposed development which reference to local needs as assessed under the requirements of the NPPF.

2.   Affordable housing need and affordability

Affordable housing need

2.1   The 2020 HNA assessed affordable housing need in accordance with Planning Practice Guidance. The detailed analysis is set out in Technical Appendix C of the HNA and considered current housing need, newly arising need and future affordable supply to calculate the net annual shortfall of affordable housing. A range of data was used in the modelling which included data from the 2020 household survey, data on affordable lettings and housing register information.

2.2   The overall gross shortfall across the district is **617** affordable dwellings each year. After taking into account supply of affordable accommodation, the net shortfall is **243** each year. This justifies a continued need for a robust affordable housing policy.

2.3   Table 1 sets out the gross annual need by number of bedrooms and sub-area. For Sherwood, the gross annual need is for 90 affordable dwellings, with a broad mix of dwelling types and sizes required as shown in Table 1.

2.4   The HNA also confirmed that a 60% affordable rented and 40% affordable home ownership remains appropriate for Newark and Sherwood district.

Table 1   Annual affordable imbalance by sub-area and number of bedrooms

Table 5.3 Affordable dwelling type and number of bedrooms (%)									
Dwelling type/size	**Sub-Area**								**Newark and Sherwood**
	Collingham	Mansfield Fringe	Newark	Nottingham Fringe	Rural South	Sherwood	Southwell	Sutton on Trent	
1 or 2-bedroom house	58.6	0	11.7	0	71	42.5	0	27.2	19.1
3-bedroom house	21.6	42.5	14.8	79	8.3	17.3	42.3	0	23.7
4 or more-bedroom house	16.6	32.2	19.5	0	0	0	0	17.9	15.5
1-bedroom flat	0	11	7.1	0	0	6.5	0	0	5.9
2 or 3-bedroom flat	0	0	0	0	0	0	0	3.7	0.1
1-bedroom bungalow	0	0	19.8	0	0	8.9	0	9.7	9.9
2-bedroom bungalow	3.1	14.2	27.1	12.2	20.7	17.9	23.6	23.2	21
3 or more-bedroom bungalow	0	0	0	8.8	0	6.8	7.7	18.2	2.5
Other	0	0	0	0	0	0	26.4	0	2.3
Total	100	100	100	100	100	100	100	100	100
Gross annual need	31	112	258	15	35	90	54	21	617

Source: 2020 HNA Table 5.3

Affordability

2.5   The 2020 HNA considers house prices, rents and affordability across the district and at sub-area level. In 2019, lower quartile prices were £110,000 in Sherwood (District £127,500 and England £152,000) and median prices were £171,864 (District £181,750 and England £237,000). The lower quartile household income in Sherwood was £15,000 and median was £25,000 (CAMEO UK Data).

2.6   The HNA assumes that a property is affordable if it costs no more 3.5x household income with a 10% deposit available. On this basis, lower quartile prices are 7.3x lower quartile incomes and median prices are 6.9x median incomes. Both ratios are above the 3.5x benchmark and without substantial deposits the ability to buy is a challenge for many households.

2.7   Table 2.12 of the HNA sets out income by sub-area using data from the 2020 household survey. In the Sherwood sub-area, 24.8% of households had an income of at least £39,000 with 14.3% earning £59,800 or more. Table 2.13 of the HNA sets out gross household income by sub-area using CAMEO UK data. In the Sherwood sub-area, 13.6% of households had an income of at least £40,000 with 2% earning £75,000 or over.

2.8   The household survey also considered the extent to which households could afford higher priced properties. As part of the household survey data analysis, an 'affordability threshold' was calculated for each household. This takes into account household income and access to equity/savings to help fund the purchase of a home. The proportion who could afford higher priced properties in the Sherwood sub-are shown in Table 2.

Table 2 Affordability of higher priced properties in the Sherwood sub-area	
Price that could be afforded*	% of households who could afford
£250,000	10.9
£300,000	7.1
£350,000	3.3
Base	10,457 households

Source: supplementary analysis from the 2020 household survey provided to the council

*Based on affordability threshold of 3.5x household income plus any savings/equity available

3.   The needs of older people and need for adapted homes

Older person needs

3.1   According to the latest 2018-based Office for National Statistics (ONS) population projections, over the period 2019 to 2033, the number of people in the district aged 65 and over is projected to increase from 26,994 in 2019 to 35,322 in 2033. This represents an increase of 8,328 or 30.9%. The number aged 75 and over is expected to increase by 5,090 or 41.9%. These data are presented in Table 4.1 of the 2020 HNA.

3.2   Paragraph 4.20 of the 2020 HNA stated 'The 2020 household survey data indicates that older people are mostly living in 3 or 4-bedroom houses and 2 or 3-bedroom bungalows. Of those who intend to move home in the next five years *(around 15% or 1,835 older person households)*, these households have strong aspirations and expectations to move to bungalows with 2 and 3 or more-bedrooms. Given the anticipated increase in older person households, it is important that the council recognises the impact this will have on the range of dwelling types and sizes being developed over the plan period.'

3.3   Paragraph 4.23 of the 2020 HNA stated 'In terms of moving home, over half households seeking to move home (60.4%), expected to move to a dwelling with fewer bedrooms. 31.6% expected to move to a dwelling with the same number of bedrooms and 8.0% expected to move to a greater number of bedrooms.'

3.4   The needs of older people are an increasingly important consideration in developing new homes and should be specifically recognised in the proposed development.

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The need for adapted homes

3.5   The 2020 HNA considered the need for M4(2) accessible and adaptable and M4(3) wheelchair user dwellings as part of the assessment of overall housing need.

3.6   Paragraph 4.58 of the 2020 HNA concluded 'Given the ageing population in the district and the identified levels of disability amongst the population, it is recommended that a policy to provide new homes built to accessibility standards is included in the local plan. On the basis of available evidence, it is therefore suggested:

- that a minimum of 1% of new dwellings are built to M4(3) wheelchair accessible standard; and

- a minimum of 23% of new dwellings are built to M4(2) standard based on the proportion of households in the district who would currently benefit from M4(2) accessible housing.

3.7   These needs should be recognised in the proposed development.

4.   Dwelling mix at district and sub-area level

District-level analysis

4.1   The target for housing delivery is 454 dwellings each year across the district as presented in the Amended Core Strategy of March 2019.

4.2   Paragraph 61 of the National Planning Policy Framework (NPPF) requires local planning authorities to assess the size, type and tenure of housing needed for different groups in the community.

4.3   An analysis of overall dwelling mix has been presented in the 2020 HNA which considered:

- Future household projections;

- Dwelling stock information;

- Data identifying the relationships between households and dwellings derived from the 2020 household survey; and

- Data from affordable housing need analysis.

4.4   A key component of this analysis is to consider future demographic change and the impact this is expected to have on future dwelling mix. Data were modelled at the district level as household projections are only published at that level. The full technical analysis is set out in Appendix D of the 2020 HNA.

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4.5   Table 3 sets out the overall dwelling mix that would be appropriate at the district level over the period 2019-2033. This included the outputs from affordable housing needs analysis which is set out in Appendix C of the 2020 HNA.

Table 3	Overall dwelling type and number of bedrooms by and tenure mix under baseline demographic scenario, 2019-2033 (Tenure %)			
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 more-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 5.5 2020 Newark and Sherwood Housing Needs Assessment

Sub-area analysis

4.6   In order to provide further granularity of analysis, the 2020 HNA then considered the specific dwelling mixes appropriate for individual sub-areas. The method for this analysis was slightly different. It considered the affordable rented and intermediate tenure needs based on sub-area analysis. It then considered a blend of the market aspirations and expectations of households expecting to move in the open market.

4.7   This established a clear profile of sub-area market mix. Data for the Sherwood sub-area where the appeal site is located is show in Table 4.

Table 4	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 2020 Newark and Sherwood Housing Needs Assessment

4.8 This analysis showed that for market housing, strongest need was for 3- and 4-bedroom houses. There was also a need for 1- and 2-bedroom flats and bungalows.

4.9 For affordable rented dwellings, the main need was for 1 to 3 bedroom houses, 1 bedroom flats and 1-3 bedroom bungalows.

4.10 For intermediate dwellings which includes affordable home ownership, the main need was for 3- and 4-bedroom houses and 1 to 3 bedroom bungalows.

4.11 These sub-area needs broadly reflect the needs evidenced at the district level.

5. Proposed development mix

5.1 The proposed dwelling mix is set out in Table 4 of the LPA Statement of Case and reproduced as Table 5 overleaf. This clearly demonstrates that the overall dwelling mix proposed for the site is at variance with the evidence of market mix, affordable rented need and intermediate need. The specific variances are:

- A lack of bungalows in the market mix.

- A focus on 1- and 2-bedroom affordable rented dwellings compared with a broader range of need.

- A focus on 1- and 2-bedroom intermediate tenure dwellings compared with a broader range of need.

5.2 There are also no specific references as to how the proposed development will help meet the needs of older people or people with disabilities who require adapted accommodation.

Dwelling type and number of bedrooms	Market mix		Affordable rented		Intermediate	
	Sub-area profile (%)	Appeal Scheme (%)	Sub-area profile (%)	Appeal Scheme (%)	Sub-area profile (%)	Appeal Scheme (%)
1 to 2-bedroom house	0.0	0	42.5	100.0	6.0	100.0
3-bedroom house	45.2	62.4	17.3		35.8	
4 or more-bedroom house	27.9	37.6	0.0		35.8	
1-bedroom flat	4.3	0	6.5		0.0	
2 or more-bedroom flat	1.1	0	0.0		0.4	
1-bedroom bungalow	0.0	0	8.9		2.4	
2-bedroom bungalow	15.3	0	17.9		7.9	
3 or more-bedroom bungalow	6.2	0	6.8		11.7	

Table 5   Comparison of development mix priorities for Sherwood with Appeal Scheme housing mix

6. Conclusions

6.1   The 2020 HNA provides up to date evidence of overall housing need across the district to reflect the requirements of the NPPF. It identifies appropriate dwelling mixes which should inform new development taking place across the district and individual sub-areas.

6.2   The Appeal Site dwelling mix does not sufficiently reflect the local needs identified. To better meet local evidenced needs, the site needs to provide a broader range of dwellings across all tenures, particularly affordable rented and intermediate tenure. Additionally, the development needs to take account of the needs of older people and the need for adapted and wheelchair accessible accommodation.