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deliver affordable homes. Furthermore, the Council have subsequently published a revised affordable housing strategy which is discussed in further detail below.

Other material considerations

Ashfield Local Plan 2023 -2040– CD 6.1

- 4.7 Ashfield District Council are currently preparing a new Local Plan which covers the period between 2023 and 2040. The draft plan is currently at Regulation 19 stage and consultation closed on 29th January 2024. The draft Plan has since been submitted for examination in April 2024. The Planning Inspectorate have published the hearing dates for the examination of the plan with the final date being 31st January 2025⁸. It is unclear when the plan will be adopted, however the Council's published Local Development Scheme aims for an April 2025 adoption.
- 4.8 Notwithstanding the above, emerging Policy DS1 sets out the requirement for affordable housing, it states that for developments of more than 10 dwellings or above 0.5ha in size will be required to provide 30% affordable on site. It also sets out a tenure mix of 66% for affordable or social rent, 25% for first homes and 9% for other affordable home ownership models.

Ashfield District Local Plan Examination – Matter 2: Affordable Housing – CD 12.13

- 4.9 Within this local plan examination document, under paragraph 2.8 the question asked is regarding whether affordable housing needs will be met. The Council's response refers to the 2020 and 2024 housing needs assessments and lists several ways they will look to meet need through the emerging policy. It concludes in paragraph 2.8.6 that *"Despite the level of need, it is not considered that this points to any requirement for the Council to increase the Local Plan housing requirement due to affordable needs"*.

⁸ <https://www.ashfield.gov.uk/local-plan-examination/local-plan-latest-news/>

Ashfield Affordable Housing Delivery Strategy 2019-2021 – CD 15.8

- 4.10 The Ashfield Affordable Housing Strategy 2019-2021 sets out a strategy and actions to increase the supply of affordable homes within the District. On page 3 it states that there is a supply shortfall of 223 affordable homes each year based on the 2015 SHMA between the period 2010-2017.
- 4.11 I note since the 2015 SHMA the need in the 2020 and 2024 needs assessments have both increased the net annual need per annum. Furthermore, tables 6.3, 6.4 and 6.5 show the shortfalls exceed that quoted in the Ashfield Affordable Housing Strategy 2019-2021.
- 4.12 On page 1 of the Strategy, it states the following *“It is Ashfield District Council’s vision that the residents of Ashfield have affordable and warm housing in a safe community that promotes their health and wellbeing. To achieve this, it is vital that we and others continue to build new affordable homes each year to keep up with the demand from our growing population. Whilst hundreds of new homes are built each year in Ashfield, only a small number of these are affordable for those residents on low incomes and who cannot afford to buy or rent properties on the open market”*.
- 4.13 The strategy increases the affordable provision over the Local Plan Policy HG3 from 6% to 10%.

Ashfield District Corporate Plan 2023-2027 – CD 15.10

- 4.14 The Council’s corporate plan sets out priorities for the district over the 2023-2027 period. It sets out 6 priorities, with one of them being “homes and housing”, with regards to affordable housing it states the following on page 7 *“our aim for the next five years is to significantly increase the overall supply of affordable and appropriate houses across the District so that everyone has somewhere to live”*.
- 4.15 In terms of outcomes with regards to homes and housing one of the key indicators stated on page 9 is *“Increased supply of affordable housing - new build and acquisitions”*. On the same page it goes on to state that *“We will work closely with partners through our direct alignment to the new EMCCA Land and Housing priority workstream focussed on affordable housing, better mix of tenures, new housing sites and sustainable homes. Initial focus on retrofit/net zero and opportunity to build a pipeline of housing sites, working with Homes England”* (My emphasis).

The Affordable Housing Delivery Strategy and Action Plan 2021 to 2023 (CD 15.9)

4.16 This strategy provides an update on actions set out by the previous Affordable Housing Strategy and sets out further actions for the 2023 to 2025 period. The Action Plan sets out 13 actions as listed below:

- 1. Deliver 100 new affordable homes between 2023 - 2028*
- 2. Continue to maximise the delivery of adapted homes on Council led or enabled developments*
- 3. Explore all available opportunities to acquire properties and sites, including other public sector estate, regeneration opportunities, auction and private sale opportunities, s.106 properties.*
- 4. As part of the Towns Fund and Future High Streets Fund Project, lead on any opportunities to deliver affordable housing*
- 5. Ensure all committed sums are utilised within the required timescales*
- 6. Explore opportunities to increase the supply of Extra Care housing in Ashfield*
- 7. Explore opportunities to deliver homes that achieve the highest standards of energy efficiency, such as Passivhaus*
- 8. Explore opportunities resulting from the East Midlands Mayoral Authority (launching May 2024)*
- 9. Maximise the delivery of affordable housing by Registered Provider partners*
- 10. Revise policies and procedures as required by the Social Housing (Regulation) Act*
- 11. Identify opportunities to maximise affordable housing delivery as a result of proposed planning policy reforms*
- 12. Monitor customer satisfaction with new homes to identify opportunities for improvement*
- 13. Monitor ongoing quality of new homes by reviewing data (such as defect reports, repairs requests, stock condition surveys) to identify opportunities for improvement*

4.17 As demonstrated through these listed actions there is a need to increase the provision of affordable housing across the District.

Homelessness and Rough Sleeping Prevention Strategy 2019-2024 (CD 15.7)

- 4.18 Ashfield Homelessness and Rough Sleeping Strategy covers the 4-year period from 2019 to 2024 and outlines strategies to tackle homelessness and rough sleeping within the District. Within the forward of the document, it states *“Ashfield has been committed to the prevention of homelessness for many years and has invested in a range of services to provide the assistance our residents need to access a secure, warm and affordable home”*.
- 4.19 The forward also points out that there is an undersupply of affordable homes *“However, the demand for our services continues to rise as our residents feel the impact of a weak economy, changes to the welfare system, an undersupply of affordable housing and funding cuts for public services and the voluntary sector”* (My emphasis).
- 4.20 Furthermore, the strategy also prioritises *“Increase overall supply of affordable and appropriate homes in the district”* (page 6).
- 4.21 Ashfield’s homeless webpage also highlights statistics related to affordability issues within the district, which include the following⁹:
- i. The median house price affordability ratio worsening, with house prices around 6 times the average Ashfield income
 - ii. Median rental price affordability is more than 3 times the average Ashfield income
 - iii. It would take around 7.5 years for someone in Ashfield to save a 20% deposit
 - iv. The gap between private rents and LHA rates ranges from £51 pcm to £892 pcm
 - v. 15% of Ashfield residents are income deprived – Ashfield is ranked 73rd most income-deprived area in England and 18 neighbourhoods are in the 20% most income-deprived areas in England.
 - vi. Between 2018-2023, 242 new affordable homes have been developed on large sites, this is 23% of all homes delivered. Each year 237 new affordable homes are required.
 - vii. Around 5-7% of homes owned by the Council are re-let each year
 - viii. Demand for homes owned by the Council has increased by 76%; and

⁹ <https://www.ashfield.gov.uk/your-council/strategies-plans-policies/housing-strategy-research/homelessness-strategy/>

- ix. Nationally the turnover of PRS properties has reduced by 38% and demand has increase by 46%

Summary and Conclusions

- 4.22 The relevant Development Plan in respect of affordable housing for Ashfield District Council currently comprises Saved Policies of the Ashfield District Local Plan Review (2002).
- 4.23 The evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Ashfield District.
- 4.24 The appeal proposals provide an affordable housing contribution which exceeds requirements of Policy HG4 of the Local Plan.
- 4.25 The up to 30 affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of the District, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 6 of my evidence.

Affordable Housing Needs

Section 5

Introduction

- 5.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the District.

The Development Plan

- 5.2 The relevant development plan for Ashfield District Council (DC) comprises the Saved Policies of the Ashfield District Local Plan Review (2002) (the 'Local Plan Review 2002') covering the period to 2011.
- 5.3 Policy HG4 (Affordable Housing) of the Local Plan Review 2002 is relevant affordable housing policy for the purposes of the appeal. In areas other than Hucknall, Policy HG4 seeks 6% of total dwellings, on sites of 25 or more dwellings or greater than 1 hectare, to be provided as affordable housing.
- 5.4 The Affordable Housing Delivery Strategy 2021-2023 was reviewed in May 2023 and is a material consideration. It identifies the delivery of '*100 new affordable homes by 2025*' as a target.
- 5.5 In the absence of a defined affordable housing target figure in adopted and/or emerging policy, it is important to consider the objectively assessed need for affordable housing within the most up-to-date assessment of local housing need.

Housing Market Assessments

Greater Nottingham and Ashfield Housing Needs Update March 2024

- 5.6 The most recent assessment of affordable housing need in Ashfield DC is the Greater Nottingham and Ashfield Housing Needs Update March 2024 (the '2024 GNAHN Update') and covers the period from 2023 to 2041.
- 5.7 Table A6 of Appendix A1 of the 2024 GNAHN provides that there is an annual net need for 302 social/affordable rented dwellings.

- 5.8 Table A11 of Appendix A1 of the 2024 GNAHN provides that there is a gross annual need for 104 dwellings in affordable home ownership ('AHO') tenures, which falls to 97 per annum if supply from AHO resales is accounted for.
- 5.9 It should be noted that this assessment along with the previous 2020 assessment have considered 50% of lower quartile home sales (LQ) as part of affordable home ownership supply, resulting in the need for affordable home ownership to be -195 in the 2020 assessment and -101 for the 2024 assessment (Table A15, p.158).
- 5.10 It should be noted that lower quartile home sales do not meet the definition of affordable homes as set out in Annex 2 of the NPPF, without meeting this definition these dwellings cannot be designated or secured as affordable housing. Neither can these LQ homes be allocated to those on the housing register.
- 5.11 Therefore, as part of my assessment, lower quartile homes have been discounted from the affordable ownership supply meaning there is a **total net affordable housing need of 399 affordable dwellings per annum** when accounting for both affordable rented and ownership (302 Social Rent + 97 Home ownership).
- 5.12 The affordable housing need identified by the 2024 GNAHN is higher than that identified by the previous two assessments, the Greater Nottingham and Ashfield Housing Needs Assessment 2020 (the '2020 HNA') and the Nottingham Outer 2015 Strategic Housing Market Assessment (the '2015 SHMA'), demonstrating the trend that the need for affordable homes is increasing.

Greater Nottingham and Ashfield Housing Needs Assessment 2020

- 5.13 The 2020 HNA covers the period between 2020/21 and 2037/38. Table 5.13 (page 73) provides that there is an annual net need for 237 affordable rented dwellings in Ashfield DC. Table 5.18 (page 78) provides that there is a gross annual need for 85 affordable dwellings in AHO tenures and an annual supply of 3 dwellings in AHO tenures. This results in a net annual need of 82 affordable dwellings in AHO tenures.
- 5.14 The 2020 HNA provides that there is a total net affordable housing need of **319 affordable dwellings per annum**, this figure again discounts the 50% lower quartile house sales for reasons already set out above.

Nottingham Outer 2015 Strategic Housing Market Assessment

- 5.15 The 2015 SHMA covers the period between 2013/14 and 2032/33. Table 57 (page 170) provides that there is a **net annual need for 164 affordable homes** in Ashfield District Council at an affordability threshold of 30%.

Local Housing Need vs Affordable Housing Need

- 5.16 The council's latest Housing Land Monitoring Report, (CD 12.1), published in 2024, sets out that the council's overall housing need for the period 1/4/2023 to 31/4/2040 is being calculated using a figure based on the Government's Standard Methodology for assessing Local Housing Need.
- 5.17 Whilst the Standard Method for calculating Local Housing Need applies an affordability adjustment, the PPG is clear that:

*"The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the **affordability of homes**"¹⁰ (my emphasis).*

- 5.18 Evidently, providing an affordability adjustment to start to address the affordability of homes in an Authority, is clearly not the same as calculating an affordable housing need figure. The affordability uplift is simply a function of the standard methodology, and it is not a basis for determining the numerical need for affordable housing nor the types of affordable housing required as defined in Annex 2 of the NPPF (2024).
- 5.19 This is further supported by the fact that calculating such need for an Authority is dealt with under a separate section of the PPG entitled 'How is the total annual need for affordable housing calculated?' which clearly sets out that¹¹:
- 5.20 *"The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period."*
- 5.21 The NPPF is clear, at paragraph 63, that:

*"Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community **should be assessed and reflected in planning policies**. These groups should include (but are not limited to) **those who require affordable housing**;"* (my emphasis).

¹⁰ Paragraph: 006 Reference ID: 2a-006-20190220

¹¹ Paragraph: 024 Reference ID: 2a-024-20190220

- 5.22 Whilst the Standard Method calculation may be appropriate for monitoring general housing needs and supply across the Authority, it does not provide a need figure for affordable housing in line with the PPG. As such, it does not reflect affordable housing need; nor is it an appropriate basis with which to monitor affordable housing supply.
- 5.23 In a similar fashion, the achievement of Housing Delivery Test targets does not signify that affordable housing needs have been being met over a period when using the standard method to calculate the 'number of homes required' for a Local Authority area.

Summary and Conclusions

- 5.24 It is my opinion that the evidence set out in this section demonstrates there is a clear and pressing need for more affordable homes across the Ashfield District.
- 5.25 The 2015 SHMA identified a need for 164 net affordable homes between 2013/14 and 2032/33 across the Ashfield District.
- 5.26 The 2020 HNA provides that there is a total net affordable housing need of 319 affordable dwellings per annum between the period 2020/21 and 2037/38.
- 5.27 The latest assessment of affordable housing needs is the '2024 GNAHN Update' which identifies 399 affordable homes per annum between the period from 2023 to 2041.
- 5.28 It can be seen that with each subsequent new review of the needs for affordable housing that need has increased on a per annum basis, now rising to its highest level at 399 affordable homes per annum.
- 5.29 The up to 30 affordable homes proposed at the appeal site will contribute towards meeting the substantial level of affordable housing need identified.

Affordable Housing Delivery

Section 6

Introduction

- 6.1 This section of the evidence analyses the delivery of affordable housing in Ashfield District. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the district.

Past Affordable Housing Delivery

- 6.2 Figure 6.1 illustrates the delivery of affordable housing (“AH”) in Ashfield since the start of the 2015 SHMA period in 2013/14¹².

Figure 6.1: Gross Additions to Affordable Housing Stock, 2013/14 to 2022/23

Monitoring Period	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH as a %age of total completions
2013/14	447	46	10%
2014/15	418	89	21%
2015/16	552	0	0%
2016/17	537	176	33%
2017/18	390	30	8%
2018/19	293	34	12%
2019/20	166	25	15%
2020/21	258	61	24%
2021/22	412	85	21%
2022/23	351	42	12%
Total	3,820	588	15%
Average.	382	59	

Source: MHCLG open data.

¹² The 2015 SHMA has been selected as the starting point as the Local Plan is out of date and predates the last 3 housing assessments.

- 6.3 Between 2013/14 and 2023/23, a total of 3,820 dwellings were delivered in Ashfield District, equivalent to 382 per annum. Of these, 588 dwellings were affordable tenures, equivalent to 59 per annum. This equates to 15% gross affordable housing delivery.
- 6.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy (“RtB”) sales from existing Council and Registered Provider (“RP”) affordable housing stock.
- 6.5 At a national level almost two million households have exercised their Right to Buy since it was introduced in 1980. In her Written Ministerial Statement of 30 July 2024, the incoming Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:
- “Over the last five years, there has been an average of 9,000 council Right to Buy sales annually, but only 5,000 replacements each year. Right to Buy provides an important route for council tenants to be able to buy their own home. But the discounts have escalated in recent years and councils have been unable to replace the homes they need to move families out of temporary accommodation.”*
- 6.6 Figure 6.2 below calculates the affordable housing delivery per annum since the start of the of the 2015 SHMA period in 2013/14, net of Right to Buy sales.

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Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2013/14 to 2022/23

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	Local Authority Acquisitions	Registered Provider RtB sales	Local Authority RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	A	B	C	D	E	F (B + C) - (D + E)	G (F / A) * 100
2013/14	447	46	n/a	36	3	7	2%
2014/15	418	89	n/a	42	1	46	11%
2015/16	552	0	n/a	62	0	-62	-11%
2016/17	537	176	n/a	43	3	130	24%
2017/18	390	30	0	47	1	-18	-5%
2018/19	293	34	17	48	1	2	1%
2019/20	166	25	9	56	9	-31	-19%
2020/21	258	61	16	32	6	39	15%
2021/22	412	85	2	42	2	43	10%
2022/23	351	42	4	47	3	-4	-1%
Total	3,820	588	48	455	29	152	4%
Average	382	59	8	46	3	15	

Source: MHCLG open data.

- 6.7 Between 2013/14 and 2022/23 the Council added 48 affordable dwellings through acquisitions to the 588 gross affordable dwellings delivered through completions. This figure is then reduced by 484 dwellings once Right to Buy is accounted for.
- 6.8 The net of Right to Buy total is 152 affordable dwellings delivered between 2013/14 and 2022/23, which equates to just 15 affordable dwellings per annum or 4% of the total number of dwellings delivered over the period.
- 6.9 The above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Ashfield faster than the replacements from acquisitions.
- 6.10 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal at land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019 (**CD 7.14**). Paragraph 14.108 of the Inspector's Report sets out that:

"Mr Stacey's unchallenged evidence shows that only 2,757 new affordable homes were provided in the City over the first 6 years of the plan period. This represents less than half of the target provision and a net increase of only 151 affordable homes if Right to Buy sales are taken into account. On either measure there has been a very low level of provision against a background of a pressing and growing need for new affordable homes in Birmingham" (my emphasis).

- 6.11 This was later endorsed by the Secretary of State who stated that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.
- 6.12 The seriousness of the impact was considered in an article in the Independent newspaper in June 2020. The article is attached as **Appendix JS3**. The reporter considered how Council housing sell-off continues as government fails to replace most homes sold under Right to Buy.
- 6.13 It advised that, *"Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show."* It went on to say that *"Housing charities warned that enough 'desperately needed' genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show"*.

- 6.14 The articles goes on to quote Jon Sparkes, chief executive at homelessness charity Crisis, who said:

“These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.”

- 6.15 It is important, therefore, that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account to reflect the actual level of affordable houses available.
- 6.16 The recent comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery Compared to Affordable Housing Needs

- 6.17 Figure 6.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 164 net affordable dwellings per annum at an affordability threshold of 30%, between 2013/14 and 2022/23, as set out in the 2015 SHMA.

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Figure 6.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2015 SHMA, 2013/14 to 2022/23:

Monitoring Year	Additions to AH Stock (Net of RtB)	2015 SHMA AH Needs (Net) @30%	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2013/14	7	164	-157	-157	4%
2014/15	46	164	-118	-275	28%
2015/16	-62	164	-226	-501	0%
2016/17	130	164	-34	-535	79%
2017/18	-18	164	-182	-717	0%
2018/19	2	164	-162	-879	1%
2019/20	-31	164	-195	-1,074	0%
2020/21	39	164	-125	-1,199	24%
2021/22	43	164	-121	-1,320	26%
2022/23	-4	164	-168	-1,488	0%
Total	152	1,968	-1,488		16%
Avg. Pa	15	164	-149		

Source: MHCLG Open data; and 2015 SHMA

- 6.18 Since the start of the 2015 SHMA period in 2013/14 and 2022/23 affordable housing completions (net of Right to Buy) have averaged just 15 net affordable dwellings per annum, against a need of 164 net affordable dwellings per annum. A shortfall of 1,488 affordable dwellings has arisen over the 10-year period, equivalent to an average annual shortfall of 149 affordable dwellings.
- 6.19 As demonstrated by Figure 6.3, delivery of only affordable homes net of Right to Buy over the period means that just 16% of identified affordable housing needs were met. Put another way 84% households in need of an affordable home were let down by the council's inability to deliver.
- 6.20 When the same exercise is undertaken in respect of the 2020 HNA which sets a need of 319 net affordable dwellings per annum between 2020 and 2038 annual shortfalls are also evident, as set out in Figure 6.4 below.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2020 HNA, 2020/21 to 2022/23:

Monitoring Year	Additions to AH Stock (Net of RtB)	2020 HNA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	39	319	-280	-280	12%
2021/22	43	319	-276	-556	13%
2022/23	-4	319	-323	-882	0%
Total	78	957	-882		13%
Avg. Pa	26	319	-294		

Source: MHCLG Open data; and 2020 HNA

- 6.21 As demonstrated by Figure 6.4, a shortfall of 882 affordable dwellings has arisen over the 3-year period, equivalent to an average annual shortfall of 294 affordable dwellings. The rate of delivery means that just 13% of identified affordable housing needs were met. In other words, 87% of households in need of an affordable home were not provided with one.
- 6.22 Figure 6.5. illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 399 net affordable dwellings as set out in the 2024 GNAHN since it's 2023 base date.

Figure 6.5: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2024 GNAHN, 2023 base date:

Monitoring Year	Additions to AH Stock (Net of RtB)	2024 GNAHN AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2022/23	-4	399	-403	-403	0%
Total	-4	399	-403		0%
Avg. Pa	0	399	-403		

Source: MHCLG Open data; and 2024 GNAHN

- 6.23 Although there is only a single year of data available it carries on the trend of severe under delivery against the requirements of the housing need assessments and as demonstrated in figures 6.3 & 6.4 there is no indication of this changing. Notwithstanding this, under the current 2024 GHAHN affordable housing completions are in a negative of 4 affordable dwellings for the year (net of Right to Buy), against a

need of 399 affordable dwellings for the year. A shortfall of 403 affordable dwellings has arisen in the first year of the assessment period.

- 6.24 The delivery of no gross affordable homes over the first year means that 0% of identified affordable housing needs over the year was met. Put another way, all households in need of an affordable home over the year were let down by the Council. (my emphasis).

Summary and Conclusions

- 6.25 The above evidence demonstrates that across Ashfield District, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 6.26 In the 10-year period since the start of the 2015 SHMA period in 2013, net of Right to Buy affordable housing delivery represented just 16% of overall housing delivery, equating to just 15 affordable dwellings per annum.
- 6.27 This trend has continued when assessing delivery against the 2020 HNA and 2024 GNAHN getting progressively worse. In the first year of the 2024 GNAHN there is already a 403-dwelling shortfall.
- 6.28 It is clear that a 'step change' in affordable housing delivery is needed now in Ashfield to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.29 In light of the identified level of need there can be no doubt that the delivery of up to 30 affordable dwellings on the proposed site will make an important contribution to the affordable housing needs of Ashfield.

Affordability Indicators

Section 7

Introduction

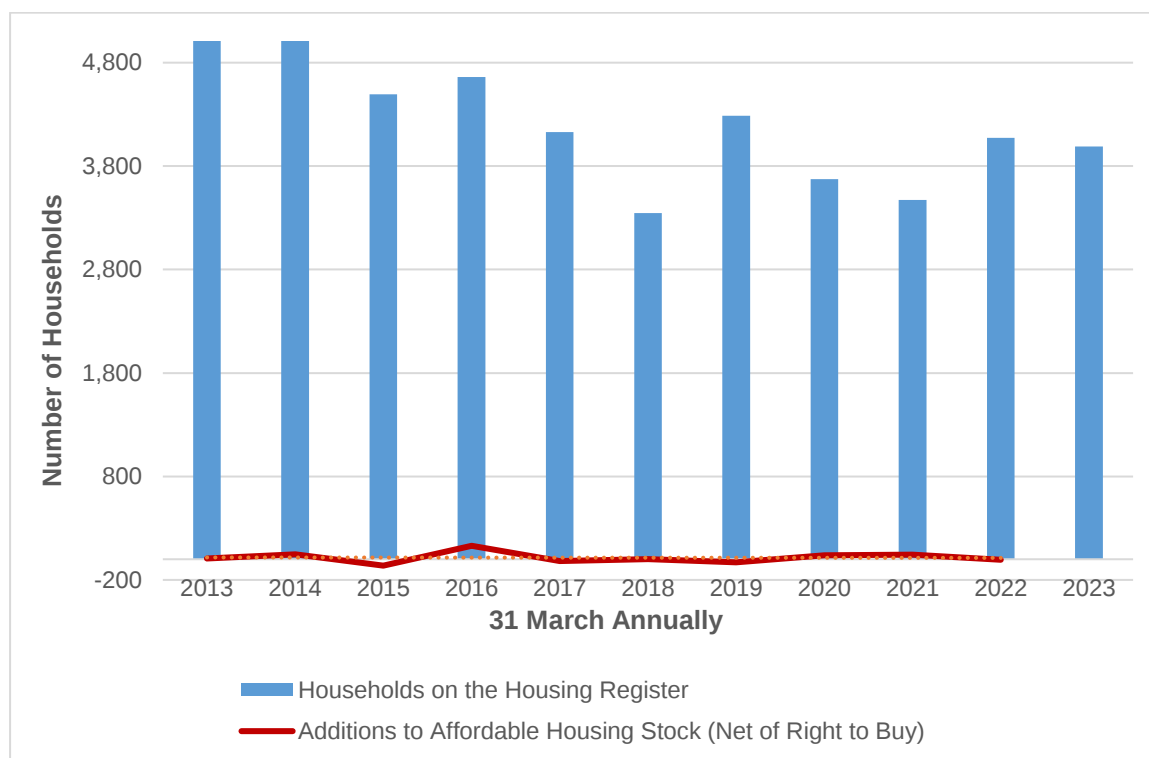
- 7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of plan making.

Housing Register

- 7.2 The Council's Freedom of Information response (**Appendix JS1**) confirms that on 31 March 2024 there were 4,404 households on the Housing Register. This represents a 10% increase in a single year from 3,989 households on 31 March 2023.
- 7.3 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Ashfield DC since the start of the 2015 SHMA between period in 2013/14.

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Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2013/14 to 2022/23.



Source: MHCLG Open Data and Council FOI.

7.4 As Figure 7.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Ashfield since 2013.

7.5 Footnote 3 of MHCLG¹³ Live Table 600 highlights that:

“The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, has contributed to a rise in the size of waiting lists. The Localism Act 2011 has contributed to a decrease in the size of waiting lists, as it allowed local authorities to set their own qualification criteria. Since households can be on the waiting list of more than one local authority, there is the potential for double counting.”

7.6 Evidently the result of the Localism Act is that many local authorities, including Ashfield, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

¹³ Department for Levelling Up, Housing and Communities

- 7.7 Following the changes brought about by the Localism Act, enabling LPA's to set their own criteria, Ashfield published a Housing Allocations Scheme (Ashfield and Mansfield Homefinder Lettings Policy, September 2018) which received a further revision in July 2019.
- 7.8 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 10% in the past 12-months, indicating a worsening of affordability across Ashfield.
- 7.9 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 7.10 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester (**CD 7.15, p.11, [63]**) in August 2017. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

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

- 7.11 Furthermore, in the appeal at Oxford Brookes University Campus at Wheatley, (**CD 7.16, p74, [13.101]**) Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

"It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses" (my emphasis).

7.12 The Inspector went on to state at paragraph 13.102 that:

“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list” before concluding that “Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”.

7.13 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

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

7.14 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In my opinion the numbers on LPA’s housing register remains high.

7.15 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. affordable rented, starter homes, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

7.16 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the most recent NPPF.

7.17 The Franklands Drive Secretary of State appeal decision in 2006 (**CD 7.17**) underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 of the Inspector’s report the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in

meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.

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

Waiting Times

- 7.19 The Council's Freedom of Information response (**Appendix JS1**) shows that successful applicants for affordable housing face lengthy and increasing waits for an affordable home in Ashfield.
- 7.20 Figure 7.2 illustrates that, based on the dwelling size, successful applicants in the 2023/24 period experienced average waiting times ranging from 122 weeks (approximately 2 years and 3 months) to 129 weeks (approximately 2 years and 5 months) for an affordable home.

Figure 7.2: Housing Register Average Waiting Times, March 2024

Size of Affordable Property	Average Waiting Time to be Housed (31 March 2024)
1-bedroom home	122 weeks
2-bedroom home	123 weeks
3-bedroom home	129 weeks
4+ bedroom home	122 weeks

Source: Freedom of Information response (11 September 2025)

- 7.21 It is crucial to note that these figures represent averages, implying that some households may have been waiting even longer than the indicated times. Additionally, these statistics only capture the waiting times for successful applicants, typically those in the highest priority need. Households with less urgent needs can anticipate significantly lengthier waiting periods.

Housing Register Bids and Lettings

- 7.22 The Council's FOI response (**Appendix JS1**) confirms that as of 31 March 2024 provides details of the number of bids per property type in the Sutton Junction & Harlow Wood Ward. Figure 7.3 below demonstrates average number of bids per property in the Sutton Junction & Harlow Wood Ward over the 2023/24 monitoring period for a range of types of affordable property.

Figure 7.3: Bids Per Property in Sutton Junction & Harlow Wood Ward, April 2023 to March 2024

Type of Affordable Property	No. Properties Advertised	Average Bids Per Property
1-bed affordable dwelling	5	162
2-bed affordable dwelling	10	285
3-bed affordable dwelling	7	320
4+ bed affordable dwelling	N/A	N/A

Source: Freedom of Information response (11th September 2024)

- 7.23 Figure 7.3 demonstrates that between 1 April 2023 to 31 March 2024 there were an average of 162 bids per 1-bed affordable dwelling put up for let in the ward, 285 average bids per 2-bed affordable dwelling and 320 average bids per 3-bed affordable dwelling.
- 7.24 This should be viewed in context of the fact that over the 2023/24 monitoring period there were **just 22 social housing lettings in Sutton Junction & Harlow Wood Ward** according to the Council's FOI response.
- 7.25 For every successful letting, there are clearly hundreds of households who have missed out and are left waiting for an affordable home. Evidently, there is a clear and pressing need for affordable homes within the Sutton Junction & Harlow Wood Ward this is not being met. (My emphasis).

Temporary Accommodation

- 7.26 MHCLG statutory homelessness data highlights that on 31 March 2024, there were 50 households housed in temporary accommodation by the District Council.
- 7.27 Of these, 28 households (56%) were households with children. The council has a responsibility to house these households.
- 7.28 Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network, at significant cost to local taxpayers.
- 7.29 MHCLG data indicates that Ashfield DC spent £152,000 on temporary accommodation between 1 April 2022 and 31 March 2023, 72% of which was spent on bed and breakfast hotels (including shared annexes).

- 7.30 The *“Bleak Houses: Tackling the Crisis of Family Homelessness in England”* report published in August 2019 by the Children’s Commissioner found that temporary accommodation presents serious risks to children’s health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 7.31 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a *“significant impact on many aspects of their lives”*.

Homelessness

- 7.32 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 205 households in need of homelessness prevention duty¹⁴, and a further 286 households in need of relief duty¹⁵ from the Council.
- 7.33 Page 7 of the Ashfield Homeless Prevention Strategy 2019-2024 highlights that *“Ashfield has seen a significant increase in the number of homeless acceptances over the last 10 years from 30 in 2008/09 to 123 in 2017/18. This increase in homelessness is reflected in the fact that Ashfield has had the most significant increase in the number of homelessness acceptances per 1,000 households over the last 10 years in Mid Nottinghamshire, from 0.61 to 2.28 in 2017/18. The Review identified that there are around 700 households at risk of homelessness each year in Ashfield. It identified an increasing trend in the number of households accepted as statutorily homeless, from a low of 16 in 2011-12, to a high of 123 in 2017-18”*.
- 7.34 Furthermore a 2017 report by the National Audit Office (“NAO”) found that *“The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England.”*
- 7.35 It is for this reason that the Private Rented Sector (“PRS”) is not a suitable substitute for affordable housing and does not have an equivalent role in meeting the housing needs of low-income families. It is highly pertinent that in the NPPF, PRS housing is not included within the Annex 2 definition of affordable housing.

¹⁴ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

¹⁵ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

Private Rental Market

- 7.36 Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data (first produced in 2013/14) show that median private rents in Ashfield stood at £600 per calendar month (“pcm”) in 2022/23. This represents a 33 % increase from 2013/14 where median private rents stood at £450 pcm.

Figure 7.4 Median Private Sector Rents, 2013/14 to 2022/23

Area	Median rent in 2013/14	Median rent in 2022/23	% change
East Midlands	£500	£675	+35%
Ashfield	£450	£600	+33%

Source: VOA and ONS.

- 7.37 It should also be noted that since the start of the 2015 SHMA period median rents in Ashfield have increased by 33%.
- 7.38 Lower quartile private sector rents are representative of the ‘entry level’ of the private rented sector and include dwellings sought by households on lower incomes.
- 7.39 The average lower quartile monthly rent in Ashfield in 2022/23 was £515 pcm. This represents a 30% increase from 2013/14 where average lower quartile monthly rents stood at £395 pcm.

Figure 7.5: Lower Quartile Private Sector Rents, 2013/14 to 2022/23

Area	Lower quartile rent in 2013/14	Lower quartile rent in 2022/23	% change
East Midlands	£425	£550	+29%
Ashfield	£395	£515	+30%

Source: VOA and ONS.

- 7.40 It should also be noted that since the start of the 2015 SHMA period in 2013/14 lower quartile rents in Ashfield have increased by 30%. It should also be noted that the growth is higher than East Midlands.
- 7.41 It is important to note that VOA/ONS rental data is calculated using all transaction data i.e., existing lets as well as new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Ashfield.