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Affordable Housing Proof of Evidence of James Stacey BA (Hons) Dip TP MRTPI

Land at Newark Road, Sutton in Ashfield

Affordable Housing Proof of Evidence of James Stacey BA (Hons) Dip TP MRTPI

Outline planning application (with all matters reserved except access) for a residential development of up to 300 dwellings with associated infrastructure and landscaping.

Land at Newark Road, Sutton in Ashfield

Hallam Land Management

December 2024

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Appendices

Appendix JS1	FOI Correspondence dated September 2024
Appendix JS2	Extracts from Planning Practice Guidance (March 2014, Ongoing Updates)
Appendix JS3	Article from the Independent (2020)
Appendix JS4	Appeals relating to Affordable Housing as an individual benefit

Core Documents

CD 3.1	Committee Report July 2024
CD 4.1	Saved Policies of the Ashfield District Local Plan Review (2002)
CD 6.1	Ashfield Local Plan 2023 -2040
CD 7.7	Appeal Decision: Sutton in Ashfield, (December 2021)
CD 7.13	Appeal Ref: 3324631 – Land at Sondes Place Farm, Westcott Road, Dorking
CD 7.14	SoS Decision: Land at Former North Worcestershire Golf Club, Birmingham (July 2019)
CD 7.15	Appeal Decision: Land at the corner of Oving Road, Chichester (August 2017)
CD 7.16	SoS Decision: Oxford Brookes University, Wheatley Campus (April 2020)
CD 7.17	SoS Decision: Land at Franklands Drive, Addlestone (October 2006)
CD 7.18	Appeal Decision: Land to the West of Langton Road, Norton (July 2016)
CD 7.19	Appeal Decision: Coombebury Cottage, Dunsfold (May 2024)
CD 7.20	Appeal Decision: Land at Firlands Farm, Hollybush Lane, (July 2015)
CD 7.21	Appeal Decision: Mans Hill, Burghfield Common (March 2015)
CD 7.22	Appeal Decision: Land to East of Highgate Hill and South of Copthall Avenue, Hawkhurst (March 2022)
CD 7.23	Appeal Decision: Land at Deerlands Road, Wingerworth (November 2018)
CD 7.24	Appeal Decision: Coalpit Heath, South Gloucestershire (September 2018)
CD 7.25	Appeal Decision: Land South of (East of Griffin Place) Radwinter Road, Saffron Waldon (October 2022)
CD 7.26	Appeal Decision: Land at Junction with Carr Road and Hollin Busk Lane, Sheffield (August 2021)
CD 9.3	Ashfield District Council Statement of Case
CD 12.1	Ashfield Housing Land Monitoring Report 2024
CD 12.13	Inspectors’ Initial Questions for ADC on the Matter of the Local Plan Examination (July 2024)
CD 15.7	Homelessness and Rough Sleeping Prevention Strategy 2019-2024
CD 15.8	Ashfield Affordable Housing Strategy 2019-2021
CD 15.9	The Affordable Housing Delivery Strategy and Action Plan 2021 to 2023
CD 15.10	Ashfield District Corporate Plan 2023-2027
CD 15.11	‘The Economic Impact of Building Social Housing’, Centre for Economics and Business Research (February 2024)

Executive Summary

- i. This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in the planning decision in light of the evidence of need in the Ashfield District Council area.
- ii. Outline planning permission is sought for up to 300 dwellings, of which 10% are proposed as affordable homes equivalent to up to 30 affordable. This level of provision exceeds the requirements of the Ashfield Local Plan Policy HG4 (6%) and complies with the 10% requirement of Ashfield Affordable Housing Delivery Strategy 2019-2021.
- iii. The proposed quantum and mix of affordable housing is considered to meet the identified local needs in accordance with NPPF paragraph 66, and will be agreed in the final details approved at RM stage.
- iv. The tenure split would be policy compliant at 75% affordable rent (up to 23 units) and 25% shared ownership (up to 7 units) in accordance with the requirements of Ashfield Affordable Housing Delivery Strategy 2019-2021.
- v. The affordable housing provision will be secured through a Section 106 agreement.

Key Findings

Corporate Documents

- vi. Corporate documents identify the delivery of affordable housing as a high corporate priority of Ashfield District Council. These include the Corporate Plan 2023-2027, The Affordable Housing Delivery Strategy and Action Plan 2021 - 2023 and The Homelessness and Rough Sleeping Prevention Strategy 2019-2024.

Affordable Housing Needs

- vii. The most recent assessment of affordable housing need in Ashfield is the Greater Nottingham and Ashfield Housing Needs Update March 2024 (the '2024 GNAHN Update') and covers the period from 2023 to 2041. The assessment identifies a need for 399 affordable homes per year over the 18-year period between 2023/24 and 2040/41.

- viii. There have also been two preceding housing needs assessments, the Nottingham Outer 2015 Strategic Housing Market Assessment (the '2015 SHMA') the Greater Nottingham and Ashfield Housing Needs Assessment 2020 (the '2020 HNA'). Under the 2015 SHMA it set a target of 164 affordable dwellings per annum, this increased further in the 2020 HNA to 319 affordable dwellings per annum. It can be seen with each assessment there has been a trend of increasing affordable need.

Affordable Housing Delivery

- ix. In the period between 2012/13 and 2022/23 a total of 3,820 dwellings were delivered in Ashfield, equivalent to 382 per annum. Of these, 588 gross dwellings were affordable tenures, equivalent to just 59 per annum.
- x. Accounting for the effect of the Right to Buy on average between 2013/14 and 2022/23, the Council has added just 152 affordable dwellings in total or only 15 per annum, net of Right to Buy sales and additions from acquisitions. This against a target of delivering 164 affordable dwellings under the 2015 SHMA. (My emphasis).
- xi. This trend has continued when assessing delivery against the 2020 HNA (319 per annum) and 2024 GNAHN (399 per annum) getting progressively worse. Under the 2020 HNA shortfall of -882 affordable dwellings has arisen over the 3-year period, equivalent to an average annual shortfall of -294 affordable dwellings.
- xii. In the first year of the 2024 GNAHN there is already a -403-dwelling shortfall. The largest annual shortfall to date and due to the impact of Right to Buy losses, net delivery exceeds the annual requirement in the 2024 GNAHN.

Affordability Indicators

- xiii. The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Ashfield for any household seeking an affordable home:

Housing Register

- FOI data confirms that on 31 March 2024 there were 4,404 households on the Council's Housing Register.

Housing Register Bids and Lettings

- On 31 March 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.

- 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.

Temporary Accommodation

- On 31 March 2024, there were 50 households housed in temporary accommodation by Ashfield District Council.

Homelessness

- In the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 205 households in need of homelessness prevention duty, and a further 286 households in need of relief duty from the Council.

Private Rental Market

- Median private rents in Ashfield stood at £600 pcm in 2022/23. This represents a 33% increase from 2013/14 where median private rents stood at £450 pcm.
- 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 rent stood at £785 pcm).

Median House Prices

- The ratio of median house prices to median incomes in Ashfield now stands at **6.15**, a 22% increase since the start of the 2015 SHMA period in 2013/14 where it stood at 5.03
- The median house price across Ashfield has risen by 66% from £110,000 in 2013 to £182,700 in 2023.

Lower Quartile House Prices

- The ratio of lower quartile house price to incomes in Ashfield in 2023 stood at **6.20**, a 22% increase since the start of the Core Strategy (2013) period 2012/13 when it stood at 5.07.
- The lower quartile house price across Ashfield has risen by 77% from £82,000 in 2012 to £145,000 in 2023.

The Future Supply of Affordable Housing

- xiv. The 2020 HNA identifies an objectively assessed need for 319 net affordable homes per annum between 2020/21 and 2037/38. Over the 18 -year period this equates to a total need for 5,742 net affordable homes.
- xv. Since the start of the 2020/21 monitoring period, the Council have overseen the delivery of 78 affordable homes (net of Right to Buy) against a need of 957 net new affordable homes, which has resulted in a shortfall of -882 affordable homes.
- xvi. When the shortfall is factored into the 2020 HNA identified need of 319 affordable homes per annum for the period 2020 and 2038, the number of affordable homes the Council will need to complete increases by 55% to 495 net affordable homes per annum over the period.
- xvii. The Council needs to deliver 2,475 net affordable homes over the next five years to address backlog needs and for the needs thereafter to return to 319 per annum to 2037/38. Whilst this level of delivery is clearly unrealistic it shows the sheer scale of the problem facing those households in need of assistance with their housing.

Conclusion

- xviii. In light of the key findings of my evidence and the acute need for affordable housing within Ashfield District, I consider that **substantial weight** should be attributed to the delivery of up to 30 affordable homes through the appeal scheme in the planning balance.

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by **James Stacey BA (Hones) Dip TP MRTPI** of **Tetlow King Planning** on behalf of **Hallam Land Management**.
- 1.2 The proposed development is for up to 300 dwellings, of which 10% (up to 30 dwellings) are to be provided on-site as affordable housing. This level of provision exceeds the requirements Policy HG4 (6%) of the Local Plan.
- 1.3 The proposed tenure split will be 75% affordable rent (up to 23 units) and 25% shared ownership (up to 7 units) in accordance with the requirements of Ashfield Affordable Housing Delivery Strategy 2019-2021. The proposed affordable housing will be secured by way of a Section 106 planning obligation.
- 1.4 The proposed quantum and mix of affordable housing is considered to meet the identified local needs in accordance with NPPF paragraph 66, and will be agreed in the final details approved at RM stage.
- 1.5 The site sits entirely within the Sutton Junction & Harlow Wood ward. Population estimates for 2020¹ indicate that within the Ashfield District there were 126,300 residents.
- 1.6 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision² considering evidence of need in the area. It should be read alongside the planning proof of evidence of Mr. Gary Lees (Pegasus).
- 1.7 My credentials as an expert witness are summarised as follows:
 - I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England (“UWE”) (1997). I am a member of the Royal Town Planning Institute (“RTPI”).

¹ Derived from the Office for National Statistics - Population estimates - small area based by single year of age - England and Wales data.

² For the clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

- I have over 29 years professional experience in the field of town planning and housing. I was first employed by two local authorities in the south west and been in private practice since 2001.
- During my career I have presented evidence at more than 150 section 78 appeal inquiries and hearings. I act for cross-section of clients and advise upon a diverse range of planning housing related matters.
- In December 2022, I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.
- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plan documents and supplementary planning documents on affordable housing throughout the UK.

1.8 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

"The evidence which I have prepared and provide for this appeal in this Statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."

1.9 I further confirm that no part of this evidence has been assisted by the use of Artificial Intelligence (AI).

1.10 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper.

1.11 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.12 As part of my evidence, I have sought data from the Council, upon which I rely, through a Freedom of Information ("FOI") request submitted to Ashfield District Council on 14th August 2024. A full response was received on 11th September 2024. The full FOI correspondence is attached at **Appendix JS1**.

1.13 This proof of evidence comprises the following ten sections:

- Section 2 establishes the importance of affordable housing as an important material consideration;
- Section 3 considers the consequences of failing to meet affordable housing needs;
- Section 4 analyses the development plan and related policy framework including corporate documents;
- Section 5 sets out the identified affordable housing needs;
- Section 6 examines past affordable housing delivery against identified needs;
- Section 7 covers a range of affordability indicators;
- Section 8 considers the future supply of affordable housing;
- Section 9 sets out the council's assessment of the application;
- Section 10 identifies the benefits of the proposed affordable housing at the appeal site; and
- Section 11 considers the weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF")

National Planning Policy Framework (12 December 2024)

- 2.2 The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-making processes. The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective is to *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations [my emphasis]'*.
- 2.3 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:
- '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 [...] **The overall aim should be to meet an area's identified housing need**, including with an appropriate mix of housing types for the local community [my emphasis].'*
- 2.4 It should be stressed that paragraph 61 identifies the 'overall aim' as to meet an area's identified housing need. Paragraph 62 clarifies that *'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 practice guidance.'*

- 2.5 Paragraph 63 also makes clear 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 (including Social Rent); [my emphasis]’*
- 2.6 The national guidance places a core responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. In particular, paragraph 66 establishes that *‘where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.’*
- 2.7 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *‘housing for sale or rent, for those whose needs are not met by the market ... and which complies within one or more of the following definitions.’*
- 2.8 It goes on to identify four categories of affordable housing: Social Rent in accordance with Government’s conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.9 The Planning Practice Guidance (“PPG”) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application. **Appendix JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

- 2.10 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority as set out in the National Housing Strategy and the Government’s Housing White Papers; it is a fundamental element in the drive to address and resolve the national housing crisis.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

- 3.1 The National Housing Strategy³ sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply. Despite the debate taking place over a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Ashfield District.
- 3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:
- “I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”*
- 3.4 When asked to clarify the word “*crisis*” by the Member for Tewkesbury, Nick Boles commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.

³ Laying the Foundations: A Housing Strategy for England (November 2011)

3.5 In response to questions, Nick Boles reaffirmed that:

“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.

3.6 He went on to say: *“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”*

3.7 Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

3.8 Mr Boles indicates that there are *“a lot of statistics to prove it”*.

3.9 Sadly, it appears the views of the then Housing Minister are still prevalent today. Furthermore, in my opinion the evidence on the housing crisis is even more undeniable.

3.10 This is witness in the recent appearance of The Minister, who addressed the Housing, Communities and Local Government Committee⁴, He began the address with a powerful reminder:

“We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates.”

⁴ committees.parliament.uk/oralevidence/15026/html/

- 3.11 My evidence in subsequent sections sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now, as it did in 2013.

Consequences of Failing to Meet Affordable Housing Need

- 3.12 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.
- 3.13 In August 2019 the Children's Commissioner produced a report titled *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* to investigate the impact of homelessness and in particular the effect of this upon children.
- 3.14 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms⁵.
- 3.15 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
- 3.16 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that *"Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work"*.
- 3.17 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a *"deeply disruptive impact on family life"*. This can include lack of support (from grandparents for example) and travel costs.
- 3.18 It found that a child's education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children's educational development can also be delayed.
- 3.19 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety. This is particularly so for 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.

⁵ The Children's Commissioner Report references a National Audit Office Report titled 'Homelessness' (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 3.20 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*”.
- 3.21 More recently, in May 2021, Shelter published its report “*Denied the Right to a Safe Home – Exposing the Housing Emergency*” which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that “*we will only end the housing emergency by building affordable, good quality social homes*” (page 10).
- 3.22 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

“Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it’s damp, cramped, or away from jobs and support networks.” (Page 5)

“... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option.” (Page 5)

The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability. (Page 6)

If you live in an overcrowded home, you’re more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer. (Page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding” (Page 12)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%).” (Page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (Page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn.” (Page 25)

“Landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.” (Page 29)

“The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing.” (Page 30)

3.23 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).

3.24 The Report concludes (page 33) that for change to happen, *“we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there’s only one way to end the housing emergency. **Build more social housing**”* (emphasis in original).

3.25 In April 2022 Shelter published a further report titled *“Unlocking Social Housing: How to fix the rules that are holding back building”*. The first paragraph of the Executive Summary is clear that:

“Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings.

Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food.”

3.26 The Executive Summary goes on to state that **“An affordable and secure home is a fundamental human need”** (emphasis in original) noting that one in three of us don’t have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

3.27 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the ‘infrastructure levy’. It states that:

“This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners.” (My emphasis).

3.28 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – *“That’s taxpayer money subsidising private landlords providing insecure and often poor-quality homes.”* The paragraph goes on to note that:

“The lack of social housing has not just pushed homeownership out of reach, it’s made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home.”

3.29 Regarding the temporary accommodation (“TA”) the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that *“TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies.”*

3.30 Page 11 goes on to highlight that *“Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in.”* This means that *“Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks.”*

- 3.31 The page goes on to conclude that *“As a result, the national housing benefit bill has grown. Tenants' incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. **There are now more private renters claiming housing benefit than ever before.**”* (emphasis in original).
- 3.32 Page 9 is also clear that *“Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters’ housing benefit simply doesn’t meet the cost of paying the rent.”*
- 3.33 In considering the consequences of this page 12 notes that *“With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution and homelessness.”*
- 3.34 Finally, page 21 is clear that:
- “For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one’s life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory, but also contributes to the threads of society by helping people contribute to their communities.*
- The evidence is clear, the financial requirements to own one’s home are out of reach for many. And many will spend years stuck in a private rented sector that’s not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them.”* (My emphasis).
- 3.35 The consequences of failing to provide enough affordable homes were also recognised by the Inspector in a recent decision in Mole Valley where I provided affordable housing evidence. Inspector McGlone (**CD7.13, p.16, [88]**) was clear at paragraph 88 of his decision that:
- “The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development. In Mole Valley the number of people on the housing register has*

risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”

- 3.36 It is also pertinent to highlight that Ashfield themselves recognise the consequences of failing to meet affordable housing needs. Page 1 of the Council’s Homelessness Strategy 2019-2024 states that:

“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.

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).

The Cost of Living Crisis

- 3.37 On 8 March 2024, the House of Commons published its ‘Rising Cost of living in the UK’ briefing report⁶ which highlights that the annual rate of inflation reached 11.1% in October 2022, a 41-year high, affecting the affordability of goods and services for households.
- 3.38 The briefing report details at Section 5.1 that *“47% of adults in Great Britain reported an increase in their cost of living in February 2024 compared to a month ago.”* Moreover, Section 5.1 further specifies that *“64% of those who reported a rise in the cost of living between 14 and 25 February 2024 said they are spending less on non-essentials as a result, while 45% reported using less energy at home and 40% report cutting back on essentials like food shopping. 3% were being supported by a charity, including food banks.”*
- 3.39 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits.
- 3.40 Shelter published a briefing report in September 2022 titled ‘Briefing: Cost of Living Crisis and the Housing Emergency’ which further explains the private rented sector problem on page one:

“LHA which determines the amount of housing benefit private renters receive has been frozen since March 2020 while private rents have risen 5% in England – and even more in some parts of the country. The freeze has left low-income private

⁶ Source: <https://commonslibrary.parliament.uk/research-briefings/cbp-9428/>

renters in an incredibly precarious position. 54% of private renters claiming housing benefit have a shortfall to their rent.” (My emphasis).

- 3.41 The Shelter briefing sets out that low-income households (including those at risk of homelessness) have no choice but to turn to the private rented sector due to a severe shortage of affordable housing and concludes on page two that *“the only sustainable solution is to address the causes of the housing emergency by investing in truly affordable social homes”*.

The Cost of Temporary Accommodation

- 3.42 In my opinion the cost of temporary accommodation is an important material consideration in the determination of this appeal.
- 3.43 BBC News reported on 13 October 2023 that English Councils spent more than £1.7bn on temporary accommodation for homeless people in the 2022/23 financial year. In my opinion this is a significant cost arising primarily as a consequence of a lack of affordable housing to adequately house people in need.
- 3.44 The article highlighted that the figure, published by the Ministry of Housing, Communities and Local Government (“MHCLG”), has increased by around 9% from the previous year. B&B accommodation alone in 2022/23 accounted for almost £500m in gross costs, increasing by a third on the previous year.
- 3.45 Shelter's chief executive Polly Neate was quoted in the article, stating that the amount spent on temporary accommodation was not only *“outrageous, but it's also illogical”*. She went on to say that:

“We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home. [..]

This decision combined with the decades of failure to build enough social homes has meant that families can't find anywhere affordable to live and as a result are forced into homelessness in cramped and unsuitable temporary accommodation, often miles away from their children's schools and support networks.” (Emphasis added)

- 3.46 Inside Housing reported in October 2023 that homelessness in England is continuing to increase, with figures published in July 2023 showing the number of people in temporary accommodation was at a record high and that the number of children in this situation is also at the highest level since records began in 2004.

Summary and Conclusions

- 3.47 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:
- i. A lack of financial security and stability;
 - ii. Poor impacts on physical and mental health;
 - iii. Decreased social mobility;
 - iv. Negative impacts on children's education and development;
 - v. Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
 - vi. Being housed outside social support networks;
 - vii. Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
 - viii. An increasing national housing benefit bill.
- 3.48 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.
- 3.49 I am strongly of the opinion that a step change in the delivery of affordable housing is needed now.
- 3.50 The acute level of affordable housing need in Ashfield coupled with worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises the Saved Policies of the Ashfield District Local Plan Review (2002) covering the period to 2011 (**CD 4.1**).
- 4.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the PPG (March 2014, ongoing updates), The Ashfield Affordable Housing Strategy 2019-2021 (**CD 15.8**) and a number of corporate documents which support the provision of affordable housing at the corporate level.

The Development Plan

Saved Policies of the Ashfield District Local Plan Review (2002) – CD 4.1

- 4.4 The Saved Policies of the Ashfield District Local Plan review was adopted in November 2002. Although the plan is considerably out of the date the Council state the following regarding the status of the policies *“Under current national planning policy (the National Planning Policy Framework) due weight can be given to relevant policies in the Ashfield Local Plan Review, according to their degree of consistency with the National Planning Policy Framework. The closer the policies in the Plan are to the policies in the Framework, the greater the weight that may be given.”*⁷
- 4.5 At Paragraph 5.12 of the Plan, it states one of the housing objectives is to meet the affordable housing needs of the district and gives target figures for the period up until 2011 and affordable housing Policy HG4 requires a 18.5% provision in Hucknall and 6% within the rest of the district.
- 4.6 However, the housing policies within the Local Plan are now clearly out of date and are not relevant. Notwithstanding this, the Local Plan does emphasise the need to

⁷ <https://www.ashfield.gov.uk/planning-building-control/local-plan/current-development-plan/>