

Rebuttal Affordable Housing Evidence of James Stacey BA Hons Dip TP MRTPI

Land at Junction with Carr Road and Hollin Busk Lane,
Deepcar

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Outline application for up to 85 residential dwellings including open space

Land at Junction with Carr Road and Hollin Busk Lane, Deepcar

Hallam Land Management

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Introduction

Section 1

- 1.1 This short rebuttal evidence is submitted in response to the Sheffield City Council Proofs of Evidence submitted by Ms Laura Stephens and Mr Adam Chapman, insofar as they relate to affordable housing matters.
- 1.2 The specific concern necessitating the need for this rebuttal evidence relates to:
 - Addressing the matter of Right to Buy losses through affordable housing net completions data and the need figures contained in the Strategic Housing Market Assessment; and
 - Weight to be attributed to the benefit of affordable housing.
- 1.3 I do not comment on other matters contained within the Council's Proofs of Evidence, but the lack of comment should not be construed as agreement.
- 1.4 I find the Council's lack of engagement with the issue of affordable housing very disappointing and somewhat surprising. It seems unwilling or unable to recognise the acute affordable housing need in the country and the particularly acute need across the Sheffield City Council administrative area together with the Council's failure to address it.

Affordable Housing Needs and Delivery

Section 2

Introduction

- 2.1 Paragraph 4.1 of Ms Stephens' Proof of Evidence discusses the Strategic Housing Market Assessment 2018 ("SHMA") and its identified affordable housing need figure of 902 affordable dwellings per annum.
- 2.2 The paragraph states that in reaching this figure the SHMA "*also takes into account other changes in the affordable stock such as losses through Right to Buy*".
- 2.3 I recognise that both the 2013 and 2018 SHMAs seek to compensate for expected Right to Buy losses, as illustrated at row 10 of table 6.1 of the 2018 SHMA (**CD3.12**). The 2013 SHMA included an estimated 65 Right to Buy losses from the available stock per annum 2013/14 to 2017/18. Whereas, the 2018 SHMA includes an estimated 533 Right to Buy losses from the available stock per annum 2018/19 to 2022/23.
- 2.4 In this context, I consider it is appropriate that the SHMA has already factored-in an estimate of the Right to Buy losses in the overall assessment of affordable housing need. The increase in the estimated rate of losses, from 65 dwellings per annum in the 2013 SHMA to 533 dwellings per annum in the 2018 SHMA is, in my view, an appropriate response to the high and increasing levels of Right to Buy losses observed in Sheffield in recent years (as illustrated in Figure 4.4 of my Proof of Evidence). Allowing for 533 affordable dwelling losses per annum through the Right to Buy in the SHMA shows the severe impact that Right to Buy losses are having in the city of Sheffield upon the available stock of affordable housing.
- 2.5 In light of this, I consider that it is no longer appropriate that I rely upon Figures 4.6 and 4.7 of my Proof of Evidence, in order to avoid potential double-counting of Right to Buy losses.
- 2.6 Figure 4.2 of my Proof of Evidence presents gross completions and does not make any deduction for Right to Buy losses. It still shows a serious underperformance against the prevailing SHMA figures from 2013/14, with a cumulative underperformance of 3,638 affordable dwellings between 2013/14 and 2019/20. In

other words, this is 3,638 estimated households whose housing needs are not being met.

- 2.7 By extension, references to affordable housing delivery performance at paragraphs 4.23, 7.4 and 8.6 should be disregarded to avoid potential double-counting (since these compare net delivery against a SHMA requirement that already factors in Right to Buy losses). Instead, the gross position of a cumulative underperformance of 3,638 affordable dwellings should be referred to.
- 2.8 However, it does remain appropriate to consider annual deductions from gross delivery arising from Right to Buy losses, as in my opinion that shows the true picture of net affordable housing additions to stock on an annual basis. It is the comparison exercise against the SHMA requirement using the net delivery figure (as per Figures 4.6 and 4.7) that would risk double-counting.

Weight to Be Attributed to the Benefit of Affordable Housing

Section 3

3.1 The Council's evidence seeks to 'downplay' the benefits of the delivery of affordable housing.

3.2 Paragraph 4.3 at page 15 of Ms Stephens' Proof of Evidence states that:

"Whilst it is not contested that the need for affordable housing in Sheffield is significant; delivery of a policy compliant 10% affordable homes on the appeal site will not make a sufficiently substantial contribution to meeting the overall shortfall such that it overrides other planning considerations".

3.3 Similarly, paragraph 8.3 at page 23 of Mr Chapman's Proof of Evidence states of the affordable housing delivery that:

"This is a limited contribution to the identified need of 902 dwellings per annum. As such limited weight is attributed to this benefit. That is not to deny it is a benefit, but simply to register the scale of the contribution made."

3.4 The Council's approach of limiting the weight to the benefit of a policy compliant 10% affordable housing is counter to that adopted by several appeal Inspectors as I detail at section 7 of my Proof of Evidence.

3.5 In my opinion the approach taken by the Council fails to respond to the pressing need for affordable homes in the City of Sheffield. This is an authority which is losing more homes through the Right to Buy than it is completing each year; where there is a substantial cumulative underperformance against affordable housing need figures in the SHMA; and where there were 32,026 households on the Council's Housing Register at 25 March 2021 with an identified need for an affordable home in Sheffield.

3.6 There can be no doubt that every one of the affordable dwellings secured by the proposed development will be allocated to a household in need – what Inspector Young termed *"a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses"* at paragraph 13.101 at page 74 of the Oxford Brookes decision (**CD5.38**).

- 3.7 In this context, it is puzzling that the Council seeks to limit the weight to the delivery of additional affordable housing. Boosting the supply of housing and affordable housing, as required by paragraph 59 of the NPPF, is an obvious remedy to the housing shortfall in the City of Sheffield. Even nine units will make a meaningful contribution towards this (especially given the limited amount of affordable housing coming forward from other sources in the City) and will ensure that nine more households have their needs met with a high quality new home where no such opportunity otherwise exists.
- 3.8 The Council's approach to the weight to apply to affordable housing delivery is perhaps symptomatic of the problem being likely to continue unabated, rather than taking all steps reasonably available to alleviate what is otherwise an acute and chronic concern affecting real households in the City of Sheffield.

Viability test

- 3.9 As a final point of clarification, paragraph 9.21 at page 30 of Mr Chapman's Proof of Evidence summarises the planning balance and notes that "*The development will have some benefits relating to the delivery of housing including affordable housing (subject to viability)*". The Planning Policy Statement of Common Ground, agreed 8 June 2021, confirms that contrary to this, there is no viability test for the proposed 10% affordable housing. The Statement of Common Ground sets out at paragraph 6.97 at page 17 that: "*The appellants have agreed that the scheme will provide a policy compliant 10% affordable housing contribution on site and there is no viability test within the S106*".
- 3.10 As such, full weight should be given to the benefit of the proposed affordable housing as the Section 106 does not contain a mechanism by which the 10% provision could be diluted.

Conclusions on Weight

- 3.11 For the reasons set out in this rebuttal and my main proof of evidence, I remain convinced that the benefits of providing 10% affordable housing are substantial and the weight is also **substantial**.