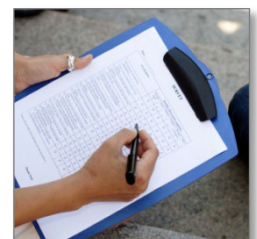
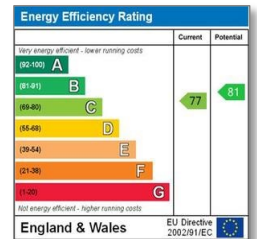




Bath & North East Somerset Local Housing Need Assessment

Report of Findings
September 2025 Draft





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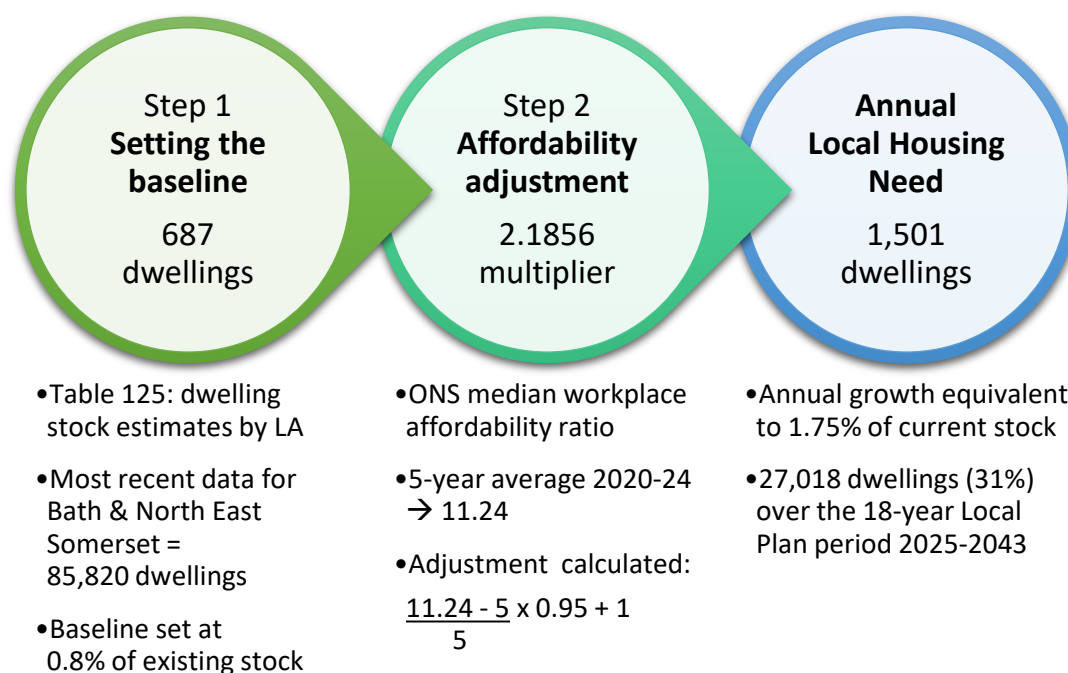
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Executive Summary

1. The National Planning Policy Framework (NPPF, December 2024) sets out the Government's objective of significantly boosting the supply of homes, with the aim of meeting each area's identified housing need with an appropriate mix of housing types for the local community. To determine the number of homes needed, the NPPF states that strategic policies should be informed by a local housing need assessment (LHNA) conducted using the standard method in national planning guidance.
2. Bath & North East Somerset (B&NES) Council commissioned Opinion Research Services (ORS) to prepare an LHNA to inform the Local Plan strategic policies as required by the NPPF. The standard method sets out a formulaic approach to determine the Local Housing Need (LHN) figure, using dwelling stock estimates to set the Step 1 baseline and the workplace-based house price to earnings ratio to calculate the Step 2 affordability adjustment (Figure 1).

Figure 1: Annual Local Housing Need for Bath & North East Somerset based on the Government's standard method calculation (Source: Dwelling stock estimates by local authority district, MHCLG May 2025; House price to workplace-based earnings ratio, ONS March 2025)

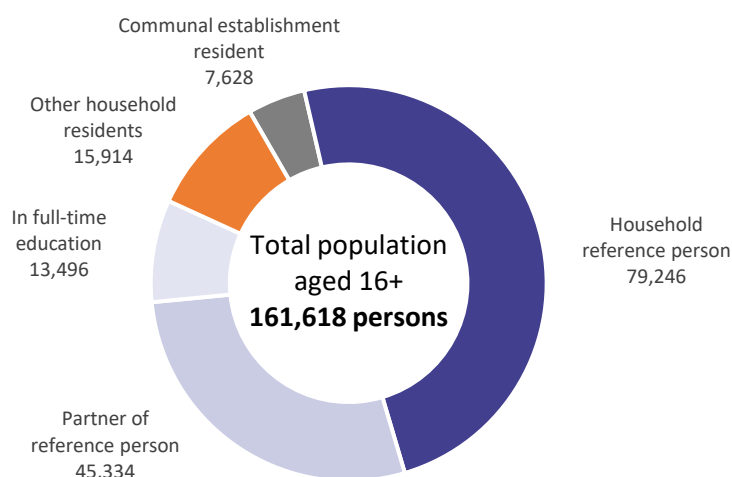


3. The standard method identifies that the annual LHN figure for Bath & North East Somerset is currently 1,501 dwellings per year. **The LHNA has therefore been prepared on the basis that 27,018 dwellings will be planned for in Bath & North East Somerset over the 18-year Local Plan period 2025-2043.**
4. Housing supply in Bath & North East Somerset has averaged around 800 net additions per year based on Government data for the last 10 years (2014-15 to 2023-24) so there will need to be a step-change in future supply to respond to housing market pressures which may have suppressed migration and household formation. If the Council is unable to plan for sufficient housing to meet the identified housing need, it will be important for this to be discussed with neighbouring local authorities under the Duty to Co-operate. However, when determining the overall amount of housing to be planned for, the Council will also have to consider any needs that cannot be met within neighbouring areas.

Growth of the Local Community

5. The number of households in Bath & North East Somerset was 79,200 at the time of the 2021 Census, an increase of 5,700 (8%) over the period 2011 to 2021. Over the same period, the number of adult children living with their parents increased by 1,500 (14%) to a total of 12,500 in 2021, and the number of concealed families increased by around 220 (43%) to a total of 720.
6. Figure 2 shows the 161,600 residents aged 16 or over on Census Day segmented into different categories. “Other household residents” include adult children living with parents and concealed family representatives.

Figure 2: Segmentation of resident population aged 16 or over on Census Day 2021 (Source: Census data, ONS)



7. Whilst many “other household residents” would not plan to move, including some that have chosen to live in multi-generational households, data from the English Housing Survey (EHS) data suggests that two fifths would prefer to live independently, and the majority would be the reference person for the new household. Applying age-specific EHS rates to the Census data for Bath & North East Somerset identifies that 5,900 of the “other” residents would want to live independently forming 5,400 potential households.
8. Given this context, the LHNA has considered two scenarios for future population growth over the Local Plan period 2025-2043. Both scenarios are based on the 27,018 dwellings identified by the standard method and assume that the housing need will provide for growth based on past trends, with student population growth separated from the rest of the population, but the assumptions then diverge as follows:
 - » **Scenario A** is based on past household formation trends and assumes that the increase to housing supply will enable additional population growth (above recent migration trends). The number of people moving to the area is therefore increased until household growth aligns with the identified housing need
 - » **Scenario B** is based on increased household formation and assumes that the increase to housing supply will enable the 5,400 potential households identified who want to live independently to form separate households. This scenario also assumes additional population growth with the number of people moving to the area increased, but with a smaller uplift.
9. Both scenarios identify a faster rate of population growth than the sub-national population projections (which assume that recent migration trends continue) although the projected population in 2043 is much higher in Scenario A (265,100 persons) than in Scenario B (245,500). Based on Scenario A there is a projected growth of 64,700 persons, which is 44% more than the growth of 45,100 persons identified by Scenario B.

10. Figure 3 provides a summary of key outputs based on the projected growth, with baseline estimates set out alongside the Scenario A and Scenario B outputs for 2043 and the change from 2025-2043.

Figure 3: Population growth by resident type, household growth and average household size, 2025-2043 (Source: ORS Model)

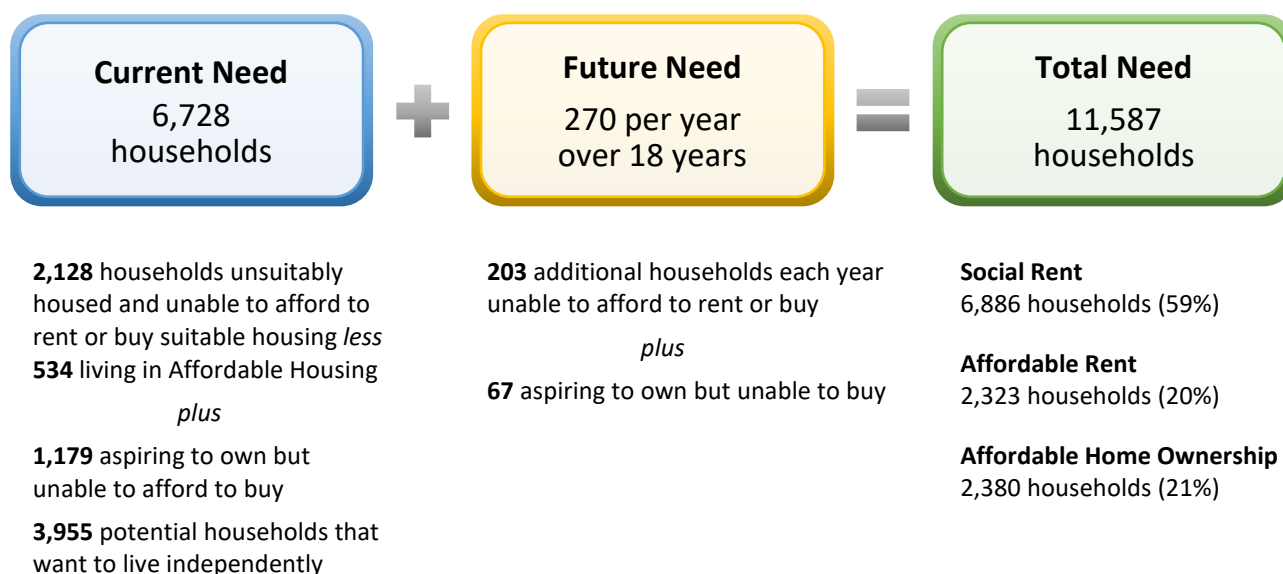
	Baseline 2025	Scenario A 2043	Change 2025-2043	Scenario B 2043	Change 2025-2043
HOUSING NEED					
Total households	83,374	108,678	+25,304	108,685	+25,311
Unoccupied dwellings	3,037	4,459	+1,422	4,460	+1,423
Dwellings in Use Class C3	86,411	113,137	+26,726	113,145	+26,734
Additional communal establishment bedspaces in Use Class C2 (equivalised to dwellings)	-	-	+292	-	+284
TOTAL HOUSING NEED	-	-	27,018	-	27,018
RESIDENT POPULATION					
Household residents	192,322	256,494	+64,173	237,119	+44,574
<i>Average household size (persons)</i>	<i>2.307</i>	<i>2.360</i>	<i>+0.053</i>	<i>2.182</i>	<i>-0.125</i>
Communal establishment residents	8,077	8,600	+523	8,361	+508
TOTAL POPULATION	200,399	265,094	+64,696	245,480	+45,082

11. Both scenarios reflect the 27,018 dwellings identified by the standard method calculation for the Local Plan period 2025-2043, but population growth in Scenario A is higher than in Scenario B due to the lower average number of persons resident in each household given the assumed increase in household formation.
12. Whilst both scenarios identify an increase of around 25,300 additional households, far more young residents aged under 35 would form households under Scenario B than under Scenario A resulting in a larger number of younger one-person households and couples without children.
- » **Scenario A** identifies growth across all household types, with one-person households and couples without children increasing by 6,800 and 6,000 respectively, families with children increasing by 7,400 and other household types increasing by 5,000
 - » **Scenario B** identifies a larger growth of one-person households (12,500) and couples without children (6,500) but a lower growth of families with children (5,500) and the number of other household types remaining stable, with an increase in all student households offset against fewer concealed families and adult children living with parents.
13. Having considered the two scenarios in detail, it is evident that Scenario B (i.e. providing the homes needed for local residents who want to form separate household and live independently) better aligns with the Government's objectives of addressing the impact of past undersupply, but more Affordable Housing will need to be provided (as many potential households have not formed as they cannot afford suitable housing) which will need to be tested in the context of economic viability.
14. Scenario B also provides a more credible demographic projection (albeit still far higher than past trends) particularly in the context of jobs growth, which broadly aligns with the number of resident workers needed based on established commuting patterns. Therefore, the LHNA has assessed the size, type and tenure of housing needed for different groups in the community on the basis of Scenario B.

Affordable Housing Need

15. The NPPF states that those groups who require Affordable Housing should be identified when assessing need, and Planning Practice Guidance confirms that “*all households whose needs are not met by the market can be considered in affordable housing need*” and that “*strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market*”.
16. Household affordability is therefore a key consideration in determining both the need for Affordable Housing and the type and tenure of homes likely to be needed by households that are unable to afford.
17. For the base date of the Plan, the LHNA identifies a current unmet need from around 2,100 households that are unable to afford to rent or buy suitable housing. Some of these households occupy Affordable Housing and taking account of the properties they would vacate reduces the net need.
18. In addition to the households unable to afford to rent or buy, there are around 1,200 households currently renting their homes who aspire to own but cannot afford to buy. Finally, of the potential households identified that want to live independently, almost 4,000 have been unable to form as they cannot afford to rent or buy suitable housing.
19. Over the 18-year Plan period, there will be additional need from new and existing households who will be unable to afford to rent or buy suitable housing and also from new households that will aspire to own but cannot afford to buy. The future need equates to an average of 270 households each year, an additional 4,900 households over the 18-year period.
20. Figure 4 summarises the LHNA analysis, which identifies a need to provide Affordable Housing for a total of 11,600 households over the 18-year Local Plan period 2025-2043, an average of around 644 per year.

Figure 4: Households needing Affordable Housing in Bath & North East Somerset 2025-2043 (Source: ORS Model. Note: Figures may not sum due to rounding)



Future Housing Mix

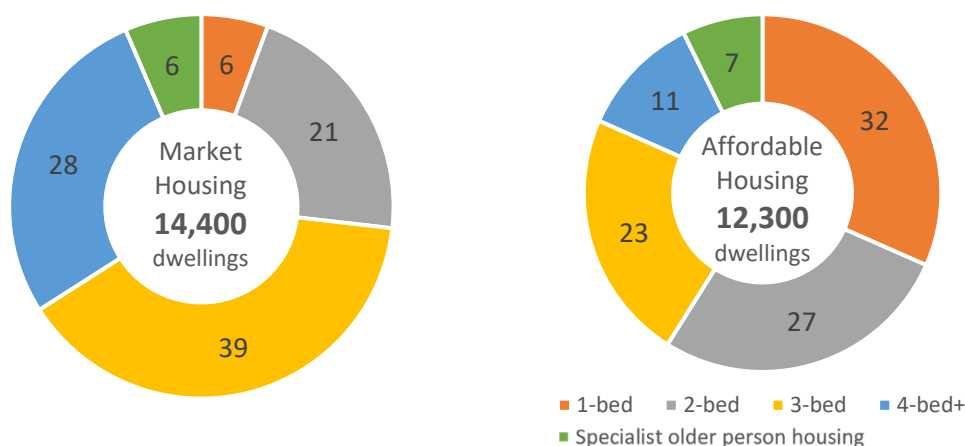
21. Figure 5 sets out the overall housing need identified for Market Housing and Affordable Housing in terms of the future housing mix based on the current inputs to the standard method calculation for Bath & North East Somerset over the 18-year period 2025-2043. The outputs identify the mix of general needs housing based on the number of bedrooms and the specialist older person housing need based on the type of housing.

Figure 5: Overall Market Housing and Affordable Housing need by property type and number of bedrooms 2025-2043
(Source: ORS Model. Note: Figures may not sum due to rounding)

Local Housing Need 2025-2043		Market Housing	Affordable Housing	TOTAL
General Needs Housing	1 bedroom	812	3,886	4,698
	2 bedrooms	3,060	3,360	6,421
	3 bedrooms	5,650	2,792	8,442
	4 bedrooms	3,026	1,016	4,042
	5+ bedrooms	956	347	1,303
Specialist Older Person Housing	Housing with Care	194	208	403
	Housing with Support	738	688	1,425
Dwellings in Use Class C3		14,437	12,297	26,734
Bedspaces in Use Class C2 (equivalised to dwellings)				284
TOTAL HOUSING NEED				27,018

22. The LHNA has identified a need for 14,400 homes for market sale or rent (54% of the total dwellings) and 12,300 affordable homes (46%). This includes an identified need for around 1,800 self-contained specialist older person housing units, comprising both Housing with Care and Housing with Support. There is also an identified need for additional bedspaces residential care and nursing homes.
23. Figure 6 provides a percentage breakdown of the identified need for Market Housing and Affordable Housing

Figure 6: Percentage mix of Market Housing and Affordable Housing need by property type and size (Source: ORS Model)



24. Whilst the LHNA forms an important part of the wider evidence base to inform the development of housing and planning policies, it is important to recognise that these findings should not be considered in isolation. The LHNA does not seek to determine rigid policy conclusions but instead provides a key component of the evidence required to develop and support a sound policy framework.

1. Introducing the Study

- 1.1 The National Planning Policy Framework (NPPF, December 2024) sets out the Government's objective of significantly boosting the supply of homes, with the aim of meeting each area's identified housing need with an appropriate mix of housing types for the local community:

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

*62. To determine the minimum number of homes needed, strategic policies should be informed by a **local housing need assessment**, conducted using the **standard method** in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

National Planning Policy Framework, December 2024 (emphasis added)

- 1.2 Bath & North East Somerset Council commissioned Opinion Research Services (ORS) to establish a robust evidence base about the housing need in their local area through preparing a Local Housing Need Assessment (LHNA) to inform their strategic policies as required by the NPPF and associated Planning Policy Guidance (PPG).
- 1.3 The "standard method in national planning guidance" sets out a formulaic approach to determine the minimum Local Housing Need (LHN) figure and prescribes the use of specific data for the calculation. Therefore, whilst the responsibility for establishing housing need continues to rest with the local planning authority, this is constrained to a minimum LHN figure that is determined centrally by the Government.

Overview of the LHNA

- 1.4 The LHNA provides robust evidence about the need for housing (Market Housing and Affordable Housing) and the housing needs of different groups across the local area.
- 1.5 Using a wide range of secondary data and administrative data sources, the LHNA:
- » Determines the local housing need figure using the standard method in national planning guidance
 - » Confirms the minimum number of homes needed over the 18-year period 2025-2043
 - » Identifies the resident population and households that are likely to occupy these homes
 - » Provides evidence about the appropriate mix of housing types needed for the local community
 - » Establishes the appropriate balance between Market Housing and Affordable Housing.
- 1.6 It is important to recognise that the LHNA provides an unconstrained assessment of housing need for the local area on a policy-neutral basis, which is the first step in the process of deciding how many homes need to be planned for. Based on this evidence, the Council will determine the appropriate housing requirement to be planned for over the Local Plan period, which could be higher or lower than the identified housing need.

- 1.7 The housing requirement may be higher than the identified housing need to reflect local growth aspirations, which would not normally have to be justified at examination. Alternatively, the housing requirement may be lower than the identified need; but only where that can be justified by evidence on land availability, development constraints and any other relevant matters. Otherwise, the housing requirement should plan to meet the identified housing need as a minimum.
- 1.8 When assessing the appropriate mix of housing types needed for different groups in the community, evidence from the LHNA should not be considered in isolation as it will form part of the wider evidence base to inform the development of housing and planning policies.
- 1.9 The LHNA does not seek to determine rigid policy conclusions but instead sets out the likely implications of different options that may be available for policy makers to consider, together with recommendations where appropriate. On this basis, the LHNA will provide a key component of the evidence required to develop and support a sound policy framework, but individual policies will be determined based on relevant policy decisions.

Duty to Co-operate

- 1.10 The Duty to Co-operate was introduced in the 2011 Localism Act and is a legal obligation.
- 1.11 The NPPF sets out an expectation that public bodies will maintain effective cooperation with others on issues with any cross-boundary impact, in particular in relation to strategic priorities such as the homes and jobs needed in the area. This co-operation will need to be demonstrated as sound when plans are submitted for examination.

*24. Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues **including meeting housing needs**, delivering strategic infrastructure and building economic and climate resilience. Local planning authorities and county councils (in two-tier areas) continue to be under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*

National Planning Policy Framework, December 2024 (emphasis added)

- 1.12 Officers from Bath & North East Somerset Council discussed the LHNA methodology and emerging findings with officers of neighbouring local authorities under the Duty to Co-operate, and Consultation Drafts of the LHNA reports were published as part of the evidence base for the Local Plan consultation.

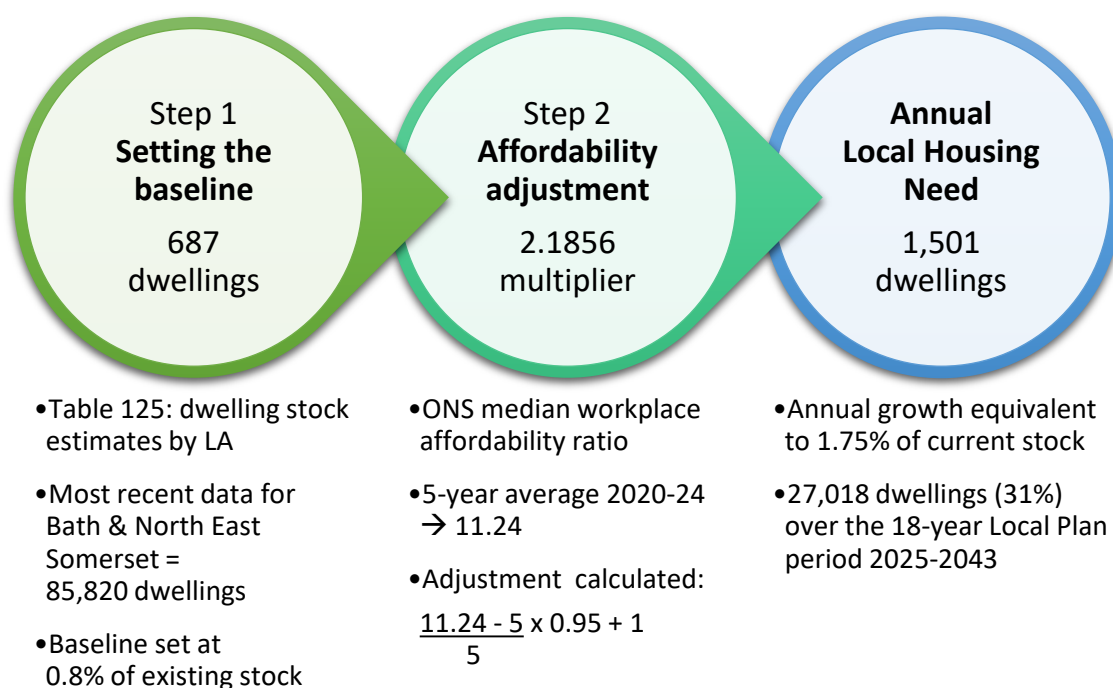
2. Establishing Local Housing Need

- 2.1 The NPPF confirms that planning authorities should normally use the standard methodology to establish a minimum Local Housing Need (LHN) figure.

Standard Method

- 2.2 The process set out in Planning Practice Guidance (PPG) for Housing Need Assessment establishes the annual LHN figure as follows, using dwelling stock estimates published by the Ministry of Housing, Communities and Local Government (MHCLG) to set the Step 1 baseline, and the house price to workplace-based earnings ratio published by the Office for National Statistics (ONS) to calculate the Step 2 affordability adjustment.¹

Figure 7: Annual Local Housing Need for Bath & North East Somerset based on the Government's standard method calculation
(Source: Dwelling stock estimates by local authority district, MHCLG May 2025; House price to workplace-based earnings ratio, ONS March 2025)



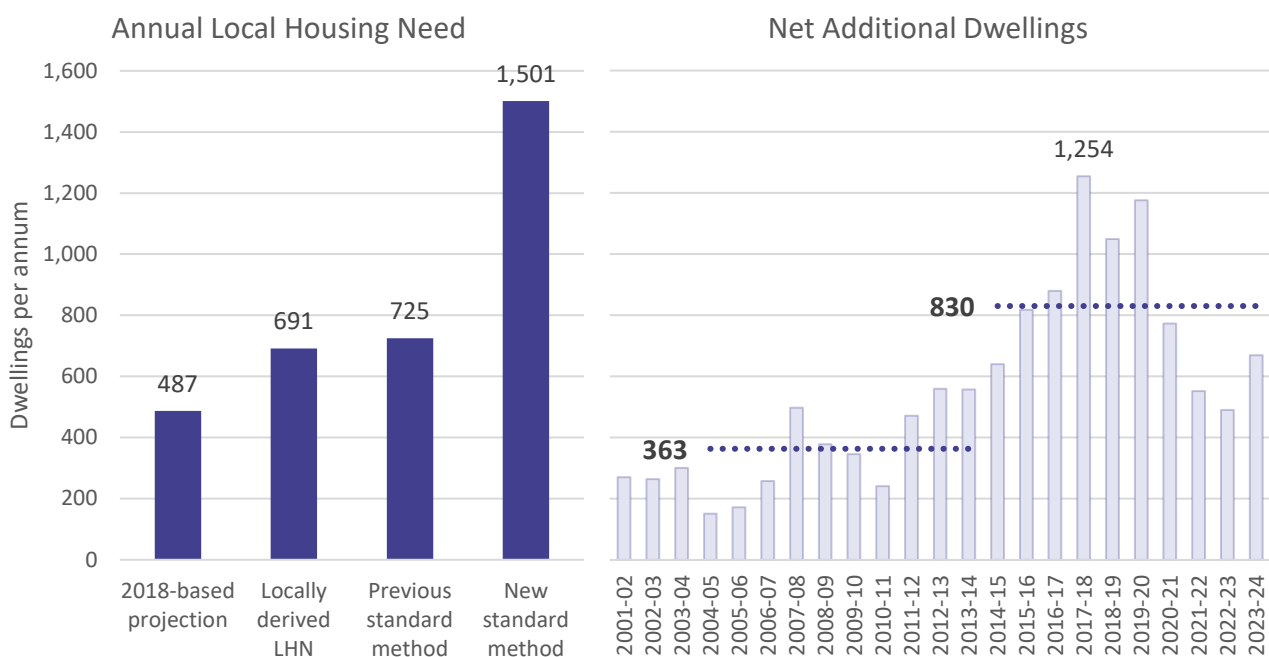
- 2.3 Based on the latest inputs for Bath & North East Somerset, the standard method calculation identifies that the minimum LHN figure for the local area is currently 1,501 dwellings per year. **The LHNA has therefore been prepared on the basis that 27,018 dwellings will be planned for in Bath & North East Somerset over the 18-year Local Plan period 2025-2043.**
- 2.4 If the Council is unable to plan for sufficient housing to meet the identified housing need, it will be important for this to be discussed with neighbouring local authorities under the Duty to Co-operate. However, when determining the overall amount of housing to be planned for, it will also be important for the Council to take into account any needs that cannot be met within neighbouring areas.

¹ PPG ID 2a-004-20241212

Setting the Housing Need in Context

- 2.5 Although the Government’s standard method calculation now uses dwelling stock estimates (and not household projections) to set the baseline at Step 1, it is important to recognise that new homes will continue to be occupied by new households.
- 2.6 The most recent official household projections for Bath & North East Somerset are the 2018-based figures. Based on current trends, the 10-year migration variant projects a growth of around 8,600 households over the 20-year period 2022-2042. Taking account of the projected growth of older residents living in residential or nursing care and unoccupied dwellings (which would normally be vacant homes, second homes, or holiday lets) the household projection-based housing need is around 487 dwellings per annum (dpa).
- 2.7 The household projection-based need was much lower than the LHN figure identified by the standard method calculation under the December 2023 version of the NPPF (725 dpa). Bath & North East Somerset Council therefore commissioned ORS to establish a locally derived LHN figure based on the available evidence. That analysis assumed that established rates of net migration should be maintained in future years as a percentage of the overall population and that household formation returned to previous rates, which led to a locally derived annual local housing need of 691 dpa which comprised 573 dpa for the general population and a further 367 bedspaces annually (which equivalised to 118 dpa) to accommodate student population growth.
- 2.8 Figure 8 summarises these assessments of Local Housing Need in the context of recent housing delivery. Based on the new standard method calculation, the Council is going to have to plan for a step-change in future housing supply to deliver the minimum number of homes needed. This increase is designed to help respond to housing market pressures which may have suppressed past rates of migration and household formation. Given this context, delivering this number of homes is likely to result in a much larger population increase than identified by past trends – but the overall number will depend on the balance between homes provided for the local population and homes provided for population growth.

Figure 8: Previous assessments of annual Local Housing Need compared with annual Net Additional Dwellings 2001-2024
(Source: Household projections for England 2018-based, ONS; Bath & North East Somerset LHNA January 2024 Draft, ORS; Net additional dwellings by local authority district, MHCLG)



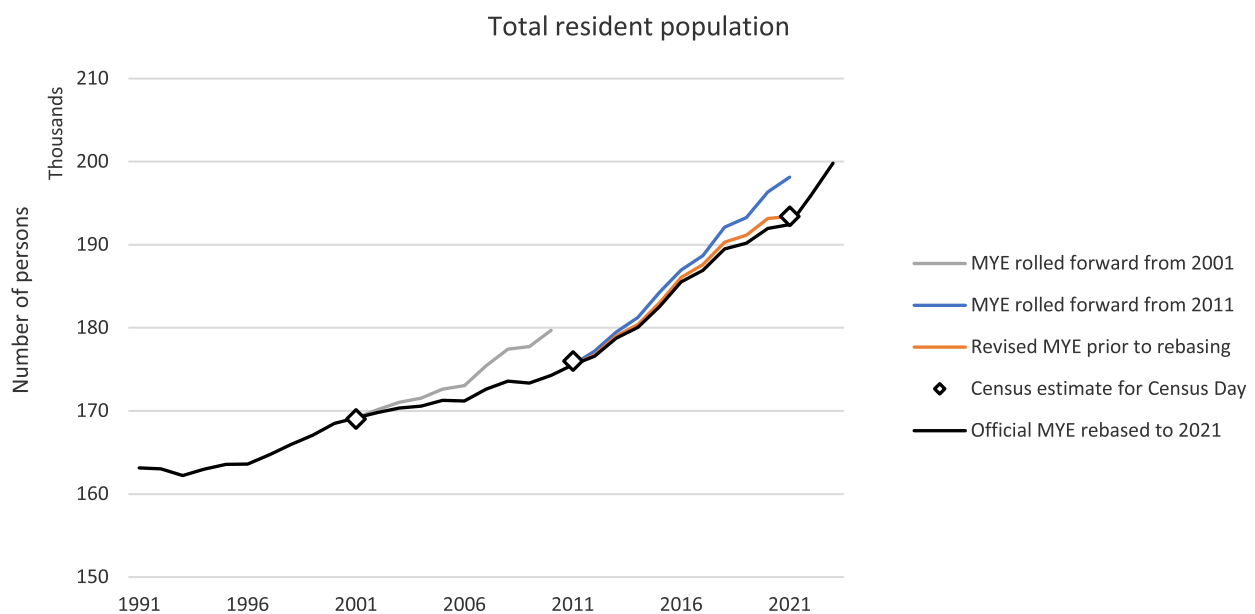
3. Growth of the Local Community

- 3.1 The following demographic analysis identifies the resident population and households that currently live in the local community and considers how these could change. On this basis, it is possible to establish the type of households that are likely to occupy homes in the area in future based on the identified housing need.

Population Trends

- 3.2 Figure 9 shows the total population for Bath & North East Somerset over the period 1991 to 2023 based on Census estimates and both current and superseded mid-year estimates.

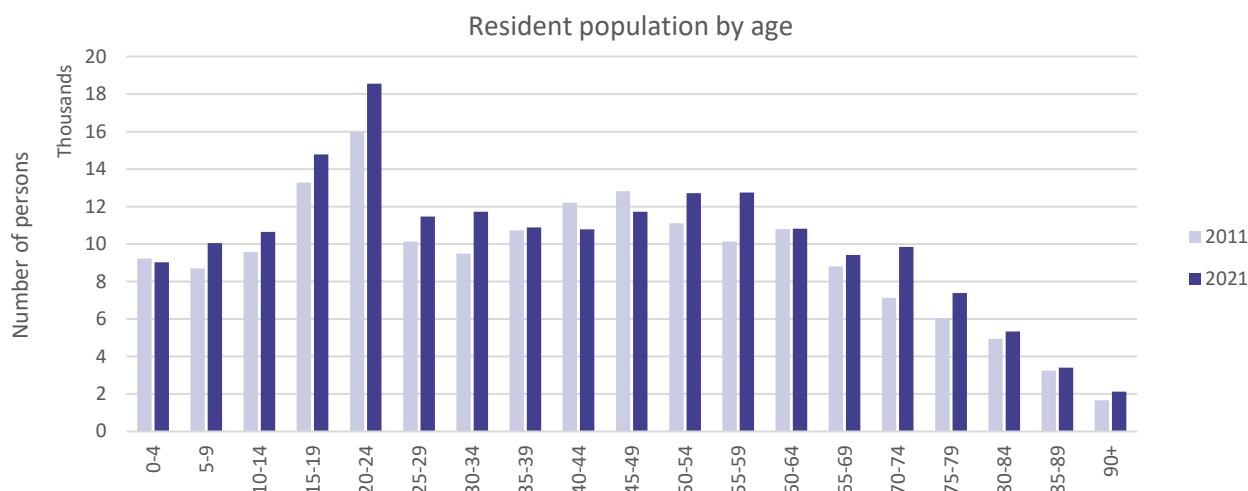
Figure 9: Official population estimates 2001-2023 (Source: Census data, ONS; Mid-year population estimates, ONS)



- 3.3 It is evident that the population has increased consistently, with annual growth over the period 2011-2021 averaging around 1,700 persons per year and an estimated resident population of around 193,400 persons at the time of the 2021 Census.
- 3.4 Unfortunately, it has been difficult to accurately estimate the resident population for years between the censuses and the methodology used by the ONS for producing the mid-year estimates has consistently overstated population growth. The original estimate for mid-2021 was reduced by 5,715 persons following the 2021 Census; and similarly, the estimate for mid-2010 was reduced by 5,437 persons following the 2011 Census. This is largely due to the analysis failing to capture students leaving the area at the end of their studies, resulting in the size of the resident population aged 20-34 being overestimated.
- 3.5 Following a detailed review of the mid-year population estimates for Bath & North East Somerset, ORS has concluded that the detailed data that would typically inform local demographic projections cannot be relied upon in this area. Whilst the estimates of births and deaths are based on accurate records, the estimates of movements in and out of the area have not typically provided a reliable basis for detailed modelling analysis. That is consistent with our conclusions when the data was reviewed for the previous Bath LHNA (2024), the Bath SHMA Update (2018) and the original Bath SHMA (2013). All three assessments concluded that the official mid-year population estimates for the area could not be relied upon uncritically.

- 3.6 Given this context, the LHNA has focussed on Census data and changes during the intercensal periods, given that these provide a more appropriate basis for the analysis. Figure 10 shows the population by age on Census Day in 2011 and 2021. There has been an increase across most age groups with the largest growth being those residents aged 15 to 34 (increasing by 7,600 persons) and aged 65 or over (increasing by 5,700).

Figure 10: Total resident population 2011 and 2021 by 5-year age group (Source: Census data, ONS)



- 3.7 Although the mid-year estimates for the area have been unreliable between Census years, the Census-based estimates in mid-2011 and mid-2021 can be relied upon as movements in and out of the area have a very limited impact on the estimates for these years. Figure 11 summarises the 10-year population change by age group (people of the same age) and by age cohort (people born in the same year) and provides further detail on the drivers of population change.

Figure 11: 10-year change in resident population by age group and age cohort (Source: Mid-year population estimates, ONS.

Note: darker and lighter shading used to identify the same populations from 2011 when considered by age group and by age cohort)

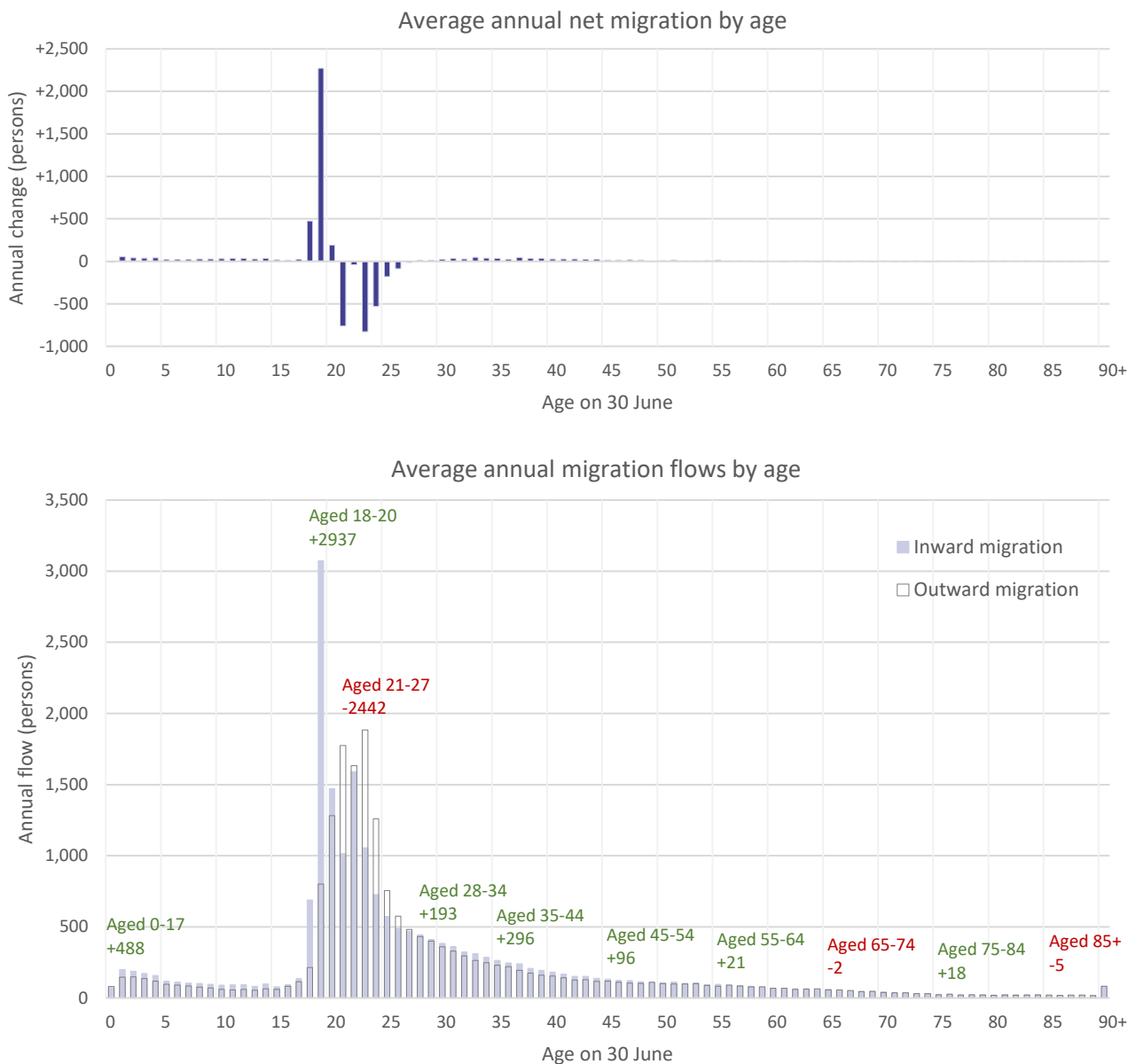
Age	Total population 2021	2011 population by age group	10-year change by age group	2011 population by age cohort	10-year change by age cohort	Natural change	Net migration and other change
Aged 0-15	31,701	29,553	+2,148	11,058	+20,643	+17,493	+3,150
Aged 16-24	30,048	26,817	+3,231	16,471	+13,577	-22	+13,599
Aged 25-34	23,115	19,605	+3,510	28,841	-5,726	-77	-5,649
Aged 35-44	21,853	22,646	-793	19,605	+2,248	-151	+2,399
Aged 45-54	24,265	24,011	+254	22,646	+1,619	-339	+1,958
Aged 55-64	23,705	20,847	+2,858	24,011	-306	-790	+484
Aged 65-74	19,221	16,118	+3,103	20,847	-1,626	-1,664	+38
Aged 75-84	12,901	11,005	+1,896	16,118	-3,217	-3,238	+21
Aged 85 or over	5,610	4,936	+674	15,941	-10,331	-10,350	+19
TOTAL	192,419	175,538	+16,881	175,538	+16,881	+862	+16,019

- 3.8 When considering the change by age group, it is evident that population in the older age groups has notably increased. However, when considering changes by age cohort, it is evident that the number of residents in older cohorts has generally reduced, primarily as a consequence of natural change.

Components of Population Change

- 3.9 Considering population change across all ages, it is apparent that natural change accounted for a net gain of almost 900 residents over the decade – i.e. there were 900 more births than deaths recorded. The remaining population growth was due to people moving from elsewhere to live in the area. A total of 16,000 persons resident in 2021 had moved to the area over the decade, but the overall level of inward migration was higher than this given that those moving away from the area are offset against this figure. It is also important to note that this analysis is based on the age of the population at the end of the 10-year period in 2021, therefore some individuals would have been younger at the time of their move.
- 3.10 Figure 12 shows trends in annual migration flows to and from the area (and the associated net migration) based on all moves over the years from 1 July 2011 to 30 June 2012 through to 1 July 2020 to 30 June 2021. This shows the age of migrants at the end of the year in which they moved (i.e. their age on 30 June) which is helpful to understand the population moving to live in the area – although these estimates should be treated with some caution given the data quality issues previously identified.

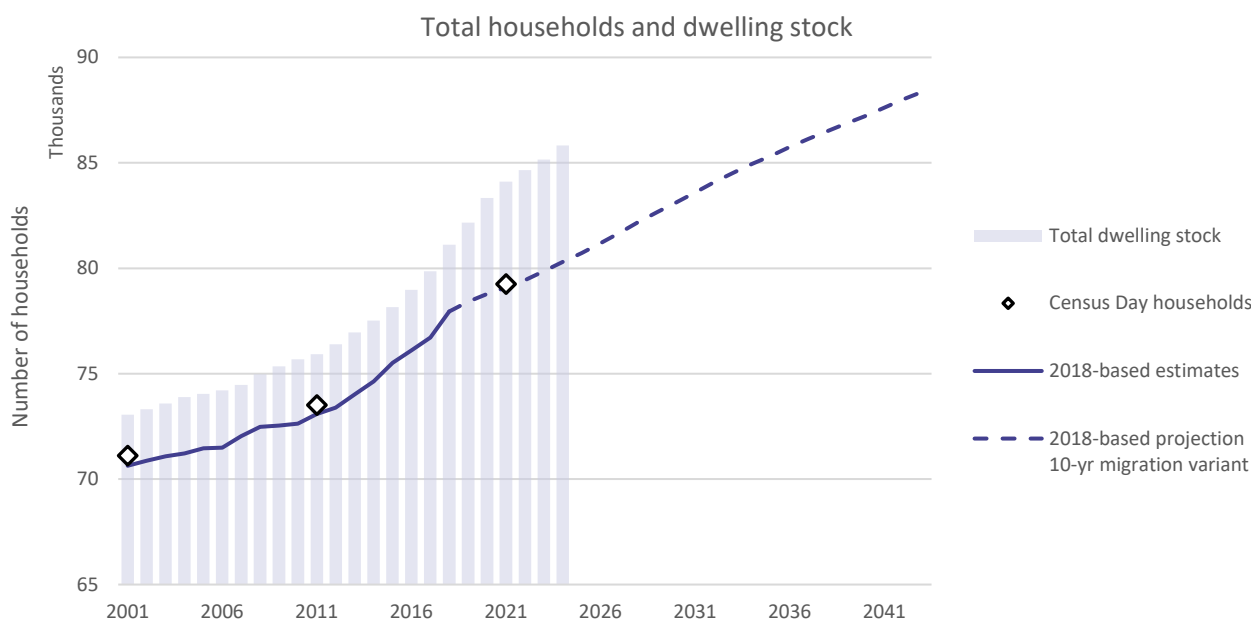
Figure 12: Average annual net migration and migration flows by age 2011-2021 (Source: Mid-year population estimates, ONS)



Household and Dwelling Estimates

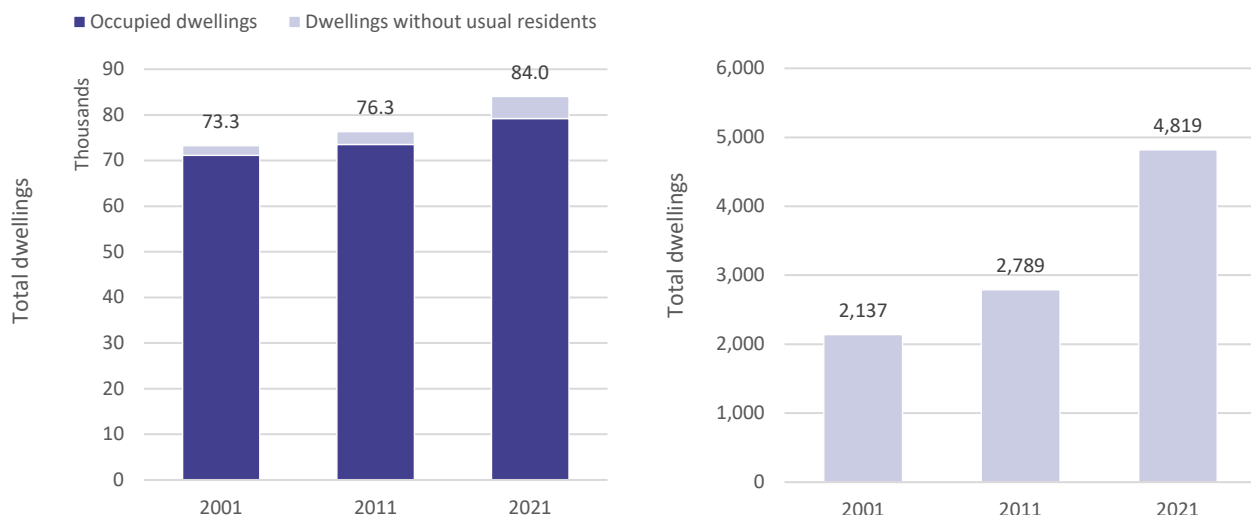
3.11 Figure 13 shows that the latest official household projections estimated there to be 77,900 households in Bath & North East Somerset at the 2018 base date, which was projected to increase to around 88,400 households over the 25-year period 2018-2043 representing an average growth of 417 households each year. The 2021 Census identified around 79,200 households resident on Census Day, which was broadly consistent with the 79,100 households that had been projected.

Figure 13: Household estimates and projections 2001 to 2043 and Dwelling estimates 2001 to 2024 for Bath & North East Somerset (Source: Census data, ONS; Household projections for England 2018-based, ONS; Dwelling stock estimates by local authority district, MHCLG)



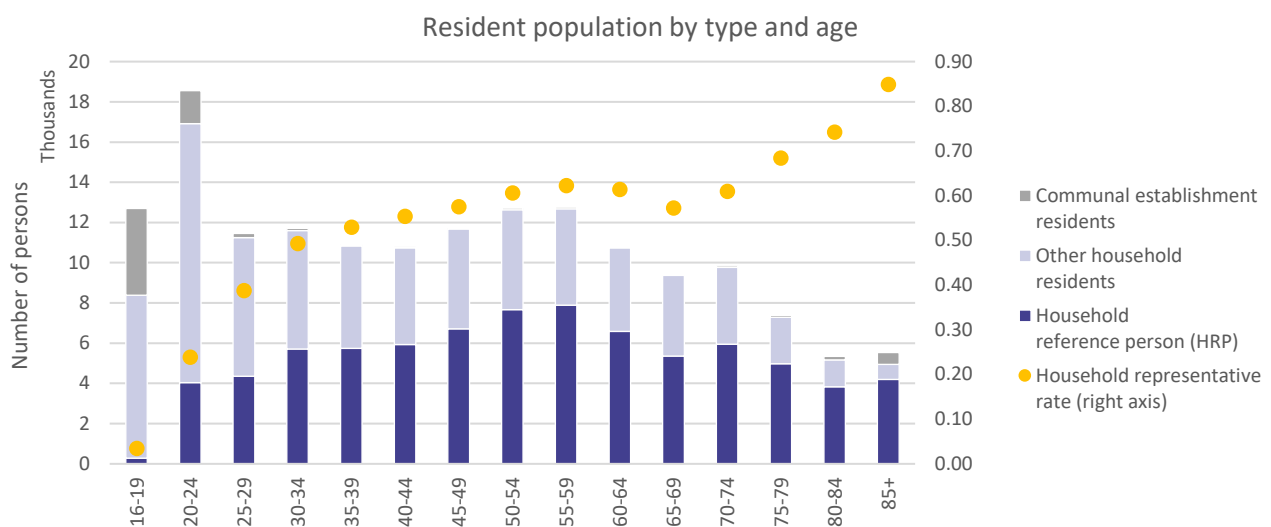
3.12 However, Figure 14 shows that the number of unoccupied dwellings on Census Day was considerably higher in 2021 than it had been in previous Census years, with around 4,800 dwellings identified without residents. This represents an increase of over 2,000 dwellings (73%) over the 10-year period 2011-2021.

Figure 14: Estimates of occupied dwellings and dwellings without usual residents 2001 to 2021 (Source: Census data, ONS)



- 3.13 Figure 15 shows the age distribution of household and communal establishment residents aged 16 or over. For the household population, the Household Reference Person (HRP) is identified separately from other household residents. This is the person who serves as a reference point and a representative of the whole household, determined statistically based mainly on their economic activity status and age. There is one reference person in every household, so the number of HRP residents will equal the number of households.
- 3.14 The Household Representative Rate (HRR) identifies the proportion of household residents are reference persons and represent their household within each age group. Fewer than half of residents aged under 35 are reference persons, so the HRR for these age groups is lower than 0.5. The rates for these groups have been reducing as fewer young people have been able to form independent households.

Figure 15: Resident population aged 16 or over by resident type and age, household representative rate by age, 2021
(Source: Census data, ONS)



- 3.15 Figure 16 identifies the number of household residents and reference persons in 2011 and 2021. Based on this data, we can see how the household representative rates have changed over the 10-year period.

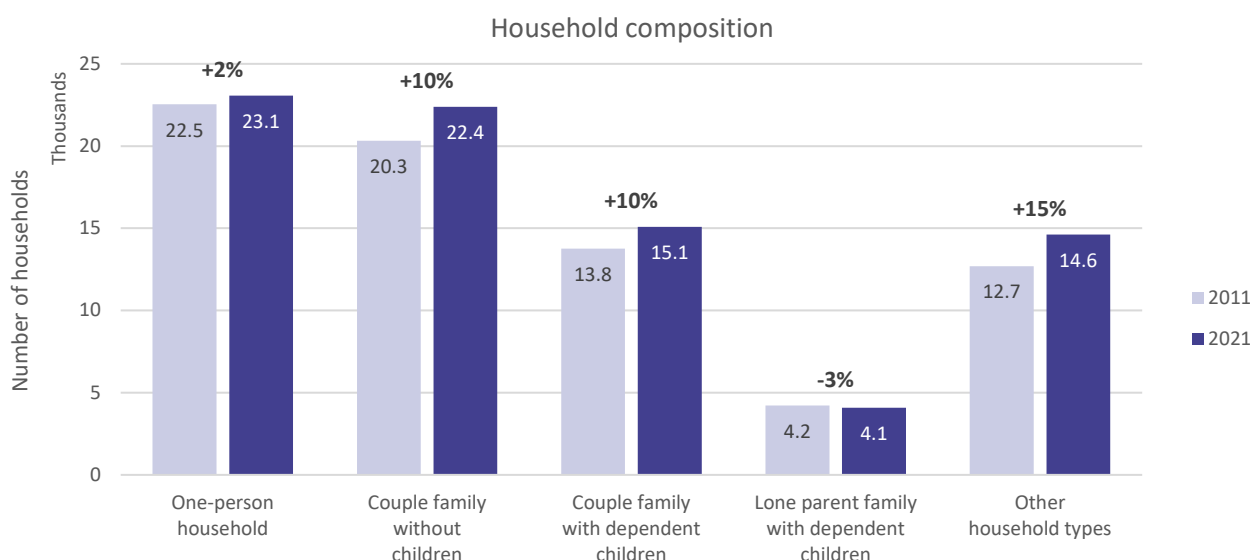
Figure 16: Household residents, household reference persons, and household representative rate by age, 2011 and 2021
(Source: Census data, ONS)

	Household residents		Household reference persons (HRP)		Household representative rate (HRR)	
	2011	2021	2011	2021	2011	2021
Aged 0-15	29,302	31,448	-	-	-	-
Aged 16-24	23,325	25,294	3,835	4,322	0.1644	0.1709
Aged 25-34	19,282	22,836	8,806	10,067	0.4567	0.4408
Aged 35-44	22,793	21,576	12,820	11,677	0.5625	0.5412
Aged 45-54	23,788	24,316	14,370	14,371	0.6041	0.5910
Aged 55-64	20,833	23,427	12,657	14,487	0.6075	0.6184
Aged 65-74	15,807	19,143	9,641	11,312	0.6099	0.5909
Aged 75-84	10,638	12,453	7,759	8,814	0.7294	0.7078
Aged 85 or over	4,209	4,945	3,627	4,196	0.8617	0.8485
TOTAL	169,977	185,438	73,515	79,246	-	-

Household Composition

- 3.16 Over the 10-year period 2011 to 2021, the number of households increased from around 73,500 to 79,200 which represents an increase of 8% overall.
- 3.17 Figure 17 shows the change over the same period based on household composition. Single family couples without children and couples with dependent children had an above average rate of growth (10%) whereas one-person households increased by only 2% and there was a 3% reduction in lone parent families with dependent children. The largest increase was other household types (15%) which increased from around 12,700 to 14,600 households over the 10-year period.

Figure 17: Household composition, 2011 and 2021 (Source: Census data, ONS)



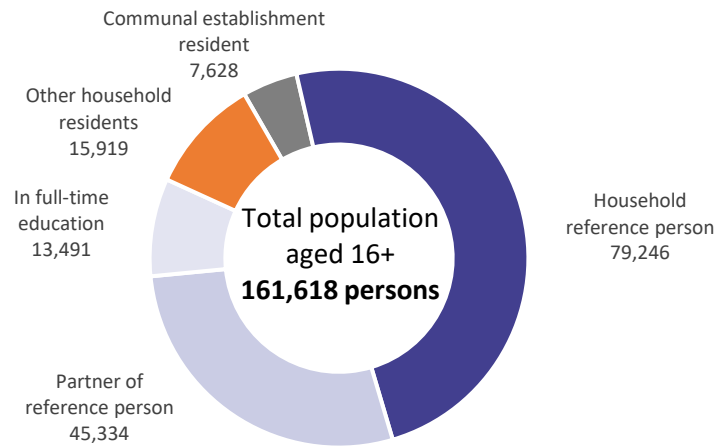
- 3.18 Other household types include student households or other groups of adults living together, households with more than one family living together, single families living with other adults, and single-family households with only non-dependent (adult) children.
- 3.19 Figure 18 provides some further details about residents and families that would form other household types. Almost 7,500 of the 14,600 other households (51%) were single-family households with only adult children, and of the remainder around 700 (5%) were multi-family households that contain two (or more) families. Whilst data about the number of multi-family households is not available from the 2011 Census, the number of concealed families (i.e. families living in a multi-family household where another family is the main family) increased by over 200 (43%) whilst there was an increase of 1,500 adult children living with parents (14%).

Figure 18: Non-dependent children, concealed families, and multi-generational households (Source: Census data, ONS)

Category	2011	2021	Change 2011-2021	% change 2011-2021
Single-family households with all children non-dependent	6,299	7,506	+1,207	+22%
Multi-family households	-	710	-	-
Concealed families	503	720	+217	+43%
Multi-generational households	-	985	-	-
Families with non-dependent children	8,907	10,110	+1,203	+14%
Non-dependent children	11,007	12,530	+1,523	+14%

3.20 Using Census data, the resident population can be separated into different categories. Figure 19 shows the breakdown for the 161,600 residents aged 16 or over on Census Day 2021.

Figure 19: Segmentation of resident population aged 16 or over on Census Day 2021 (Source: Census data, ONS)

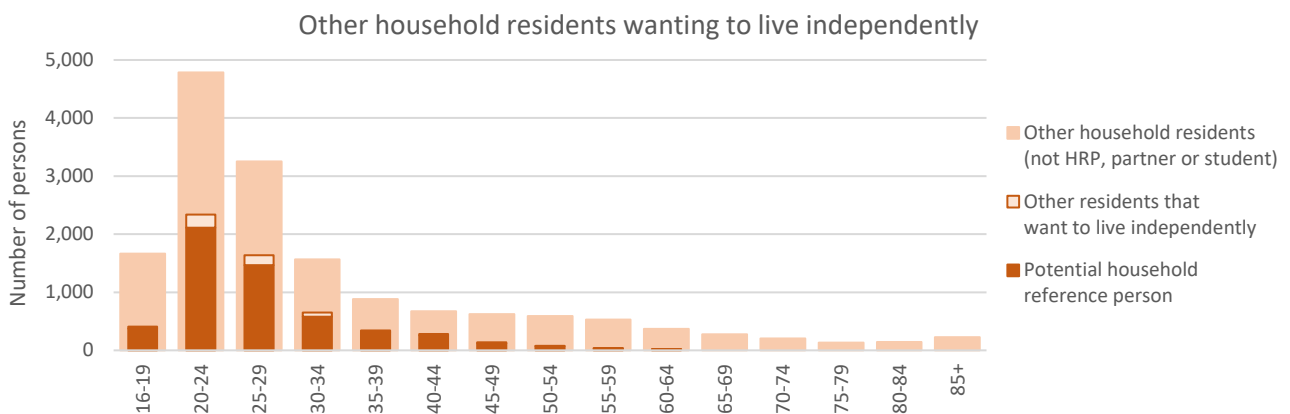


3.21 It is apparent that most residents were living as established households that already had a separate home at the time of the Census. 79,200 residents (49%) were the household reference person, 45,300 residents (28%) were the reference person’s partner, and 13,500 residents aged 16 or over (8%) were in full-time education, which would include residents living in student households and also children aged 16 or over attending school or sixth form college whilst living with their parents. Of the remainder, around 15,900 residents (10%) were not students and lived in a household where they were not the reference person or their partner, whilst 7,600 (5%) lived in a communal establishment.

3.22 The other household residents would include many of the 12,500 adult children living in their parental home (all of those no longer in full-time education) and the 700 representatives of concealed families, as well as those living in multi-adult households where they are not the reference person. Many of these individuals would have chosen to live in their current household, including some living in multi-generational households. However, it is likely that others would want to live independently if they were able to do so.

3.23 English Housing Survey (EHS) data identifies that around two fifths (38%) of “other” household residents would prefer to live independently and the majority of these (87%) would be the reference person for the new household. Applying age-specific EHS rates to the Census data for Bath & North East Somerset identifies that 5,900 of the “other” residents would want to live independently forming 5,400 potential households, and they have been considered when developing the scenarios for assessing future housing need.

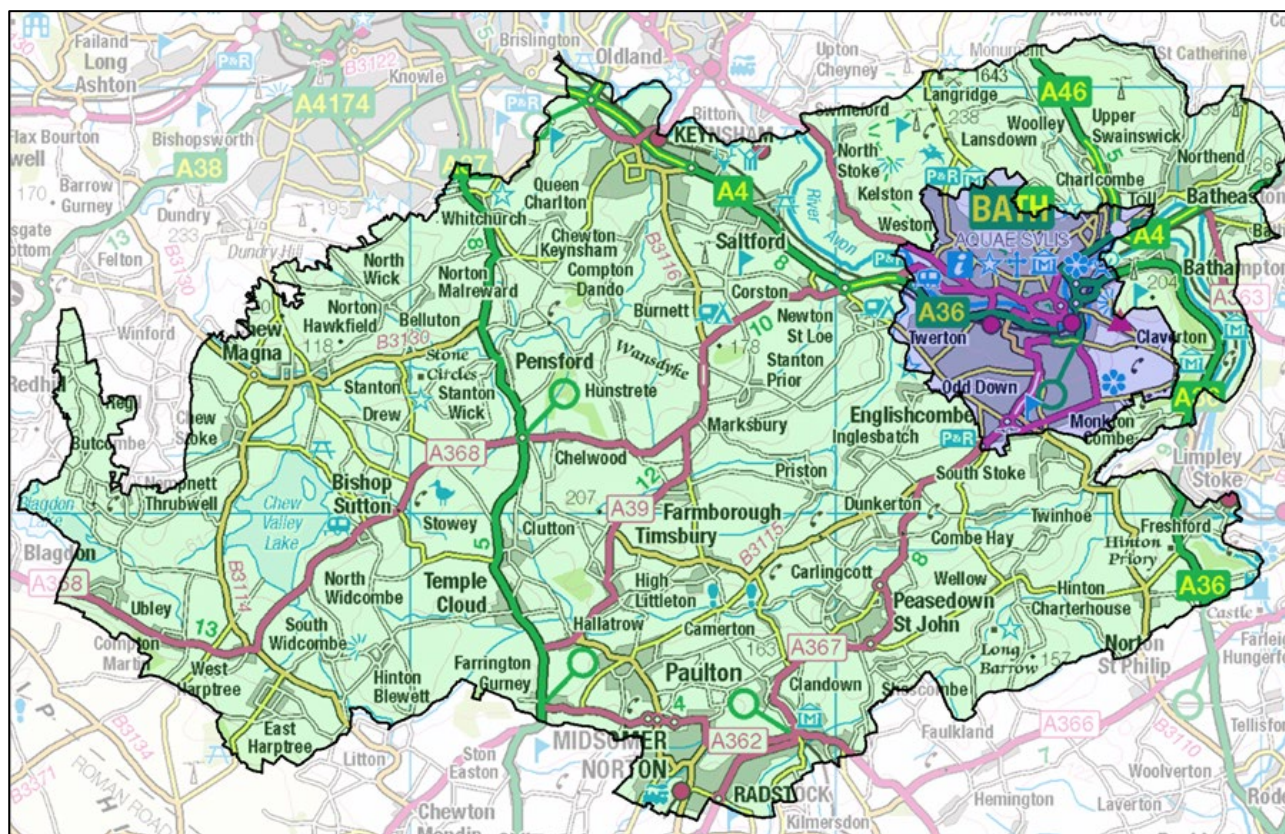
Figure 20: Residents wanting to live independently and potential household representatives by age (Source: ORS Model)



Baseline Population

- 3.24 The LHNA forms part of the evidence base that will inform the emerging Local Plan, which will plan for the development needs of the district over the 18-year period 2025-2043. Given this context, it is necessary to establish the baseline population at the base date of the Plan in 2025.
- 3.25 The population and household projections for the LHNA are based on the official projections and cover the 18-year period 2025-2043. However, given the data quality concerns associated with the mid-year estimates, the LHNA has taken the 2021 Census as a starting point with the baseline projection of future population growth based on intercensal population change. This provides a robust basis that accurately reflects the local population without artificially inflating the number of students assumed to stay in the area after completing their studies.
- 3.26 The use of Census estimates and the availability of detailed population data has enabled the LHNA to consider the core student population separately from other residents. In addition, as data is available for small areas, Bath City has been considered separately from North East Somerset. Figure 21 illustrates the boundaries for the two sub-market areas.

Figure 21: Map of sub-area boundaries



- 3.27 Figure 22 provides a summary of the baseline demographics at the base date of the Plan in 2025.
- 3.28 There are estimated to be around 83,400 established households with a total of around 192,300 residents. A further 8,100 residents will live in communal establishments which yields an overall population of around 200,400 persons at the base date, which includes around 97,800 economically active residents.

Figure 22: Summary of baseline demographics at the start of the Plan period by sub-area, 2025 (Source: ORS Model)

Baseline 2025	Bath City	North East Somerset	Total
Total households	41,339	42,035	83,374
Household residents	91,295	101,027	192,322
Communal establishment residents	5,934	2,143	8,077
TOTAL POPULATION	97,230	103,169	200,399
Economically active residents	46,833	50,924	97,757

3.29 Figure 23 provides a detailed breakdown of the baseline households by age of household reference person, identifying the number of established households by household composition and the further 5,400 potential households – 2,200 in Bath City and 3,200 in North East Somerset – that want to live independently but do not occupy a separate home at the base date of the Plan.

Figure 23: Baseline number of households by household composition and age of household reference person by sub-area, 2025 (Source: ORS Model)

Households 2025	16-24	25-34	35-44	45-54	55-64	65-74	75-84	85+	Total
BATH CITY									
One-person household	715	1,457	1,224	1,589	2,192	2,356	2,140	1,322	12,994
Couple family without children	215	1,855	895	856	2,013	2,105	1,584	484	10,007
Couple family with dependent children	18	768	2,518	2,489	599	47	3	0	6,442
Lone parent family with dependent children	33	482	608	621	140	10	3	1	1,899
Other household types	4,415	1,009	556	1,042	1,718	726	365	166	9,997
BATH CITY TOTAL	5,396	5,571	5,801	6,596	6,661	5,244	4,096	1,973	41,339
<i>Potential households living in Bath City that want to form independently</i>	822	1,021	276	89	21	-	-	-	2,228
NORTH EAST SOMERSET									
One-person household	82	790	835	1,161	1,889	2,268	2,447	1,692	11,165
Couple family without children	69	1,438	755	1,056	2,878	3,390	2,667	784	13,038
Couple family with dependent children	26	1,535	3,856	2,911	596	46	3	0	8,973
Lone parent family with dependent children	39	580	792	677	107	10	3	0	2,208
Other household types	102	375	411	1,608	2,390	958	544	263	6,651
NORTH EAST SOMERSET TOTAL	318	4,719	6,649	7,413	7,860	6,672	5,665	2,739	42,035
<i>Potential households living in North East Somerset that want to form independently</i>	1,616	1,082	342	102	29	-	-	-	3,171

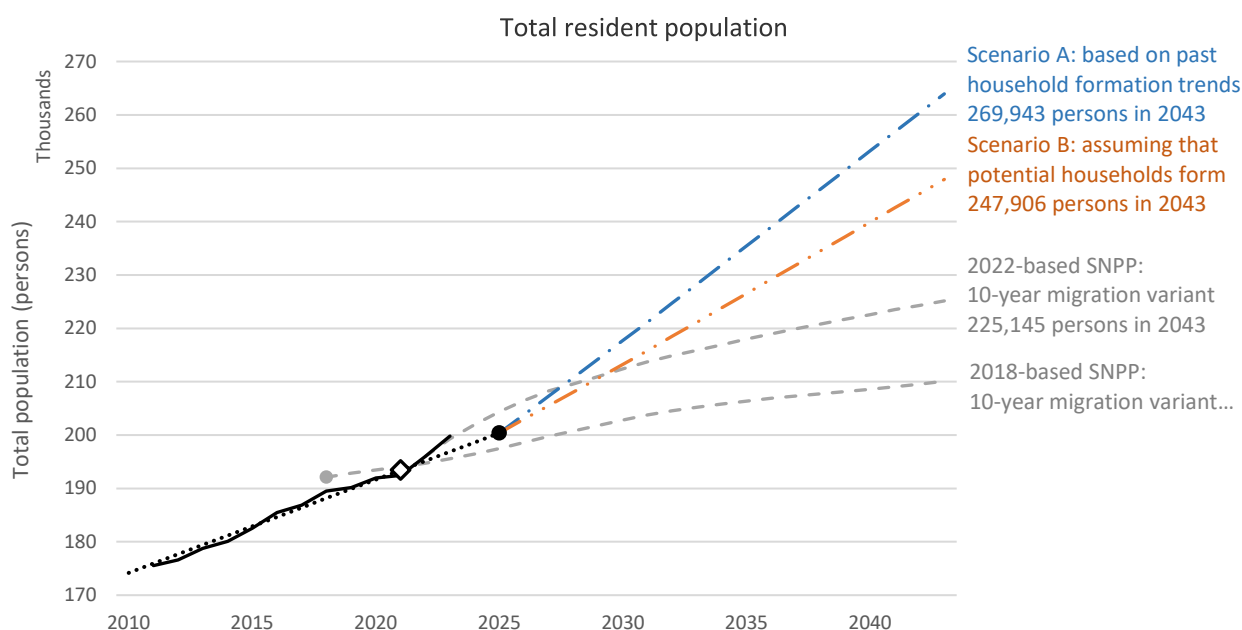
Population Growth

- 3.30 Based on the Government's standard method calculation (Figure 7) there is a need to plan for a minimum of 27,018 dwellings over the 18-year Local Plan period 2025-2043. In assessing the appropriate mix of housing, it is necessary to establish demographic projections that align with this number of homes.
- 3.31 The LHNA population projections have separated the future growth of the student population aged 18-23 from the growth of the rest of the population. Recent trends provide the starting point for both groups, but the dwelling-led projections assume that household growth across the general population will increase above past trends to align with the LHN figure.
- 3.32 Student population growth assumes that the number of students will increase year-on-year based on the long-term growth sustained by the University of Bath and Bath Spa University. The number of students aged 18-23 resident in the local area has increased by around 7,300 over the 20-year period 2001-2021, equivalent to an average of around 370 per year. The LHNA projections assume that the average annual growth in future years will continue at a comparable rate. Nevertheless, whilst the general population is aged-on each year, the age of the core student population is held constant, so this core group of students remain aged 18-23 throughout the projection period.
- 3.33 Whilst recent trends provide the starting point for the general population, the dwelling-led projections seek to align the household growth for other residents with the LHN figure through aggregating key assumptions:
- » The starting population is the 2021 Census estimate, which is initially projected forward to 2043 using trend-based growth based on the 2001-2011 and 2011-2021 intercensal population change
 - » Institutional population growth needing communal accommodation over the projection period is established using estimates and rates from the 2021 Census
 - » Unoccupied dwellings are estimated based on rates from the 2021 Census. This includes any properties which are temporarily vacant before a new household moves in, as well as properties which have no usual residents due to them being second homes or holiday lets
 - » Household formation rates are based on 2021 Census data for the proportion of household residents that are representatives of either established households or potential households (concealed families or individuals that would prefer to live independently)
 - » To align with the dwelling targets, the level of net inward migration is increased to ensure that population and household growth aligns with the number of dwellings identified by the LHN figure: trend-based migration is maintained for the Bath City sub-area, with additional inward migrants assumed to move into the North East Somerset sub-area.
- 3.34 The LHNA has considered two scenarios for future population growth over the Local Plan period 2025-2043. Both scenarios are based on the 27,018 dwellings identified by the standard method and assume that the housing need will provide for natural growth (based on new household formations offset against dissolutions) and will enable recent migration trends to continue, but the assumptions then diverge as follows:
- » **Scenario A** is based on past household formation trends and assumes that the increase to housing supply will enable additional population growth (above recent migration trends). The number of people moving to the area is therefore increased until household growth aligns with the identified housing need (with allowances for unoccupied dwellings and additional residents living in communal establishments)

- » **Scenario B** is based on increased household formation and assumes that the increase to housing supply will enable the 17,200 potential households identified (i.e. people living in the local area but as part of another household, and who want to live independently) to form separate households. These potential households would only represent a proportion of the housing need, so this scenario also assumes additional population growth (with the number of people moving to the area increased above recent migration trends) but with a smaller uplift.

3.35 Figure 24 shows the total resident population, including the projected growth over the period 2025-2043 based on the two scenarios and also the 2018-based and 2022-based sub-national population projections, which assume that migration trends over the 10-year periods up to the respective base dates will continue. Whilst both dwelling-led scenarios identify a faster rate of population growth than the two sub-national projections, the projected population in 2043 is notably higher in Scenario A (269,900 persons) than in Scenario B (247,900). Based on Scenario A there is a projected growth of 63,500 persons, which is 34% more than the growth of 47,500 persons identified by Scenario B.

Figure 24: Population estimates and projections 2011 to 2043 (Source: Mid-year population estimates, ONS; Sub-national population projections for England 2018-based and 2022-based, ONS; ORS Model)



3.36 Figure 25 provides a summary of the components of housing need, with baseline estimates set out alongside the Scenario A and Scenario B outputs for 2043 and the change from 2025-2043. This confirms that both scenarios reflect the 27,018 dwellings identified by the standard method for the 18-year period 2025-2043.

Figure 25: Components of housing need, 2025-2043 (Source: ORS Model)

Housing need	Baseline 2025	Scenario A 2043	Change 2025-2043	Scenario B 2043	Change 2025-2043
Total households	83,374	108,678	+25,304	108,685	+25,311
Unoccupied dwellings	3,037	4,459	+1,422	4,460	+1,423
Dwellings in Use Class C3	86,411	113,137	+26,726	113,145	+26,734
Additional communal establishment bedspaces in Use Class C2 (equivalised to dwellings)	-	-	+292	-	+284
TOTAL HOUSING NEED	-	-	27,018	-	27,018

- 3.37 Scenario A shows an increase of 26,726 dwellings in Use Class C3, plus additional bedspaces in Use Class C2 which equalise to the remaining 292 dwellings. Scenario B shows an increase of 26,734 dwellings, plus 284 based on the equivalised bedspaces.
- 3.38 The number of dwellings identified in Use Class C3 is based on the total household growth, on the basis that each household will occupy a dwelling, plus an allowance for unoccupied dwellings which would include vacant homes, second homes, and holiday lets. The additional bedspaces in Use Class C2 are based on the total growth in communal establishment residents, on the basis that each resident will occupy a bedspace, plus an allowance for vacant bedspaces. The increase in bedspaces is equalised to dwellings using the same method as set out in the Housing Delivery Test measurement rule book for calculating supply,² with the increase in bedspaces divided by the average number of adults in households in England.
- 3.39 Figure 26 provides a summary of the projected population growth, with baseline estimates set out alongside the Scenario A and Scenario B outputs for 2043 and the change from 2025-2043.

Figure 26: Population growth by resident type, household growth and average household size, 2025-2043 (Source: ORS Model)

Resident population	Baseline 2025	Scenario A 2043	Change 2025-2043	Scenario B 2043	Change 2025-2043
Household residents	192,322	256,494	+64,173	237,119	+44,574
Average household size (persons)	2.307	2.360	+0.053	2.182	-0.125
Communal establishment residents	8,077	8,600	+523	8,361	+508
TOTAL POPULATION	200,399	265,094	+64,696	245,480	+45,082

- 3.40 Scenario A population growth is higher than Scenario B due to the average number of persons resident in each household. Scenario A projects an average of 2.360 persons in 2043, whilst Scenario B projects 2.182 due to the assumed increase in household formation. As the potential households identified would form from within the existing population, these additional households do not result in any additional residents, thereby reducing the average number of residents per household overall.

Future Households

- 3.41 Figure 27 provides a breakdown of the projected household composition, with baseline estimates set out alongside the Scenario A and Scenario B outputs for 2043 and the change from 2025-2043.

Figure 27: Household growth by household composition, 2025-2043 (Source: ORS Model)

Household composition	Baseline 2025	Scenario A 2043	Change 2025-2043	Scenario B 2043	Change 2025-2043
One-person household	24,159	30,991	6,832	36,707	12,548
Couple family without children	23,045	29,081	6,036	29,541	6,496
Couple family with dependent children	15,415	21,379	5,964	19,657	4,242
Lone parent family with dependent children	4,107	5,569	1,462	5,384	1,277
Other household types	16,648	21,658	5,010	17,397	749
TOTAL HOUSEHOLDS	83,374	108,678	25,304	108,685	25,311
Bath City	41,339	46,094	4,755	48,356	7,018
North East Somerset	42,035	62,584	20,549	60,329	18,293

² <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>

3.42 Both scenarios identify a similar increase overall, with total growth of around 25,300 additional households. However, there are notable differences in the household composition.

- » **Scenario A** identifies growth across all household types, with one-person households and couples without children increasing by 6,800 and 6,000 respectively, families with dependent children increasing by around 7,400 (including 6,000 couples and 1,500 lone parents) and the number of other household types increasing by 5,000 to a total of 21,700 by 2043
- » **Scenario B** identifies a larger growth of one-person households (12,500) and couples without children (6,500) on the basis that potential households have been able to form independently, but a lower growth of families with dependent children (5,500) fewer are projected to move to the area, and the number of other household types remaining stable at a total of around 17,400 with an increase in all student households that is offset against fewer concealed families and adult children living with parents.

3.43 Figure 28 provides a further breakdown of the projected household growth based on household composition and the age of the household representative. It is evident that many more young residents aged under 35 would form new households under Scenario B than under Scenario A (9,300 cf. 4,500) with a larger number of one-person households and couples without children aged 16-34 and also aged 35-54. However, these are inevitably offset against a lower household growth across other age groups.

Figure 28: Household growth by household composition and age of household reference person, 2025-2043 Source: ORS Model)

Change 2025-2043	Scenario A				Scenario B			
	16-34	35-54	55-74	75+	16-34	35-54	55-74	75+
BATH CITY								
One-person household	+314	+40	-30	+1,393	+1,964	+550	+157	+1,479
Couple without children	+135	+41	-24	+847	+359	+250	+193	+844
Couple with children	+57	+88	-81	+1	+106	+177	-77	+1
Lone parent with children	+35	+21	-20	+2	+77	+84	-15	+2
Other household types	+1,875	+12	-167	+216	+1,776	-481	-562	+133
BATH CITY TOTAL	+2,416	+201	-322	+2,460	+4,282	+580	-304	+2,460
NORTH EAST SOMERSET								
One-person household	+387	+1,550	+889	+2,289	+3,397	+1,930	+786	+2,285
Couple without children	+675	+1,347	+1,336	+1,679	+906	+1,279	+1,086	+1,579
Couple with children	+540	+5,178	+179	+1	+505	+3,440	+88	+1
Lone parent with children	+251	+1,138	+33	+1	+262	+844	+23	+1
Other household types	+229	+1,632	+791	+422	-18	-69	-315	+284
NE SOMERSET TOTAL	+2,083	+10,845	+3,229	+4,392	+5,052	+7,423	+1,667	+4,151
BATH & NE SOMERSET								
One-person household	+701	+1,590	+859	+3,682	+5,361	+2,480	+943	+3,764
Couple without children	+810	+1,388	+1,312	+2,526	+1,265	+1,529	+1,279	+2,423
Couple with children	+597	+5,266	+98	+2	+611	+3,617	+11	+2
Lone parent with children	+286	+1,159	+13	+3	+339	+928	+8	+3
Other household types	+2,104	+1,644	+624	+638	+1,758	-550	-877	+417
OVERALL TOTAL	+4,499	+11,046	+2,907	+6,852	+9,334	+8,003	+1,363	+6,611

Aligning Jobs and Workers

- 3.44 Figure 29 identifies the growth in economically active residents, with the baseline estimates for 2025 set out alongside the Scenario A and Scenario B outputs for 2043 and the associated change from 2025-2043.

Figure 29: Change in economically active residents over the 18-year Plan period 2025-2043 (Source: ORS Model)

	Baseline 2025	Scenario A 2043	Change 2025-2043	Scenario B 2043	Change 2025-2043
Bath City	46,833	49,730	+2,897	49,730	+2,897
North East Somerset	50,924	80,364	+29,440	69,773	+18,849
Total economically active residents	97,757	130,094	+32,337	119,807	+22,050

- 3.45 Scenario A identifies an increase of 32,300 economically active residents, whereas Scenario B identifies an increase of 22,000 active residents over the 18-year period 2025-2043. This compares to an additional 13,000 jobs forecast by both Oxford Economics and Cambridge Econometrics for the same period.
- 3.46 The employment evidence for the Local Plan considered six scenarios overall, the highest of which was a labour supply scenario that was based on emerging findings from the LHNA. This identified an additional 25,000 jobs based on an increase of around 23,000 economically active residents, which broadly aligns with the Scenario B outputs. Although emerging outputs from Scenario A were reviewed, these were not included as a plausible scenario as the number of jobs identified was considerably higher than the trends and forecasts.

Establishing the Future Mix of Housing

- 3.47 Having considered the two scenarios in detail, it is evident that Scenario B (i.e. providing the homes needed for local residents who want to form separate household and live independently) better aligns with the Government's objectives of addressing the impact of past undersupply.
- 3.48 Scenario B also provides a more credible demographic projection (albeit still far higher than past trends) particularly in the context of jobs growth, which broadly aligns with the number of resident workers needed based on established commuting patterns. Therefore, the LHNA has assessed the size, type and tenure of housing needed for different groups in the community on the basis of Scenario B.
- 3.49 However, delivering Scenario B is likely to need more Affordable Housing to be provided (as the majority of the potential households have not formed due to them being unable to afford to buy or rent suitable housing in the local area). This is considered further when assessing the need for Affordable Housing and it will be important for this to be tested in the context of economic viability.

4. Affordable Housing Need

4.1 The NPPF sets out that within the context of establishing need, those groups who require Affordable Housing should be identified, and that the size, type and tenure of Affordable Housing needed for different groups in the community should be assessed and the minimum proportion of Social Rent homes identified:

63. 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) ...**

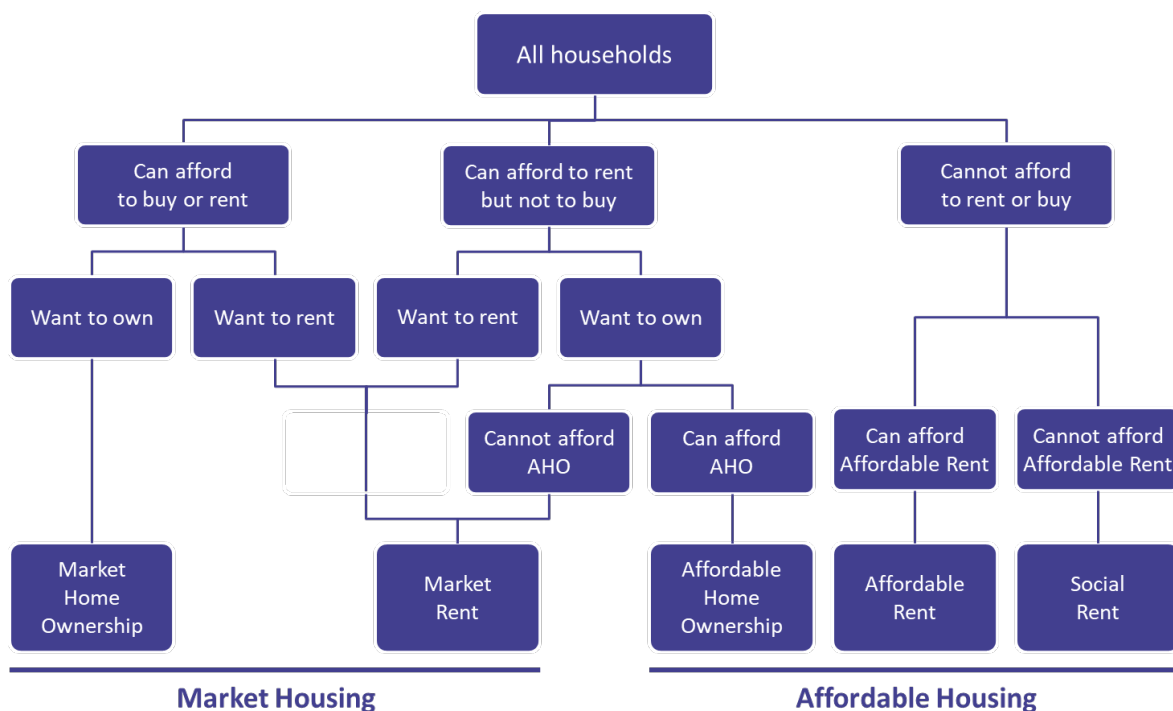
64. Where a need for affordable housing is identified, planning policies should specify the **type of affordable housing required** (including the minimum proportion of Social Rent homes required)

National Planning Policy Framework, December 2024 (emphasis added)

4.2 Given this context, PPG sets out that “all households whose needs are not met by the market can be considered in affordable housing need” and that “strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market”.³

4.3 Household affordability is therefore a key consideration in determining both the need for Affordable Housing and the type and tenure of homes likely to be needed by households that are unable to afford. Figure 30 identifies the way in which affordability is considered when assessing the need for Affordable Housing in the context of households’ aspiration to own.

Figure 30: Considering affordability when establishing the need for Market Housing and Affordable Housing



³ PPG ID 2a-018-20190220 and ID 2a-019-20190220

House Prices and Rents

- 4.4 Figure 31 shows lower quartile house prices for existing and newly built dwellings in Bath City and North East Somerset based on the number of bedrooms. Newly built dwellings generally attract a premium, and the difference in values is likely to be down to a range of factors which include the location of newbuild housing, the relative size of properties, gardens, the availability of parking, comparative quality and condition of existing stock, and other intangible issues such as character.
- 4.5 When considering rented housing, it is important to reflect on the range of different options available.
- » Private Rent is based on the lower quartile of rents recorded by the Valuation Office Agency (properties rented by Housing Benefit claimants are not included in the sample) and the Price Index of Private Rents published by the Office for National Statistics
 - » Social Rent and Affordable Rent are based on the gross rent (including any service charges) for general needs housing (which excludes supported housing and housing for older people) for the year ending March 2024 based on information published by the Regulator of Social Housing.

Figure 31: House prices and rent thresholds in Bath City and North East Somerset (Source: Price Paid Data, HM Land Registry; House Price Statistics, Price Index of Private Rents, ONS; Statistical Data Return, Regulator of Social Housing)

House Prices and Rents	Bath City				North East Somerset			
	1 bed	2 beds	3 beds	4+ beds	1 bed	2 beds	3 beds	4+ beds
HOMEOWNERSHIP								
Lower quartile house price for existing dwellings	£266,346	£330,511	£409,205	£742,696	£182,290	£234,393	£297,849	£460,000
Lower quartile house price for newly built dwellings	£399,806	£509,781	£584,144	£673,389	£200,056	£314,054	£395,263	£491,910
Equity based on 50% of price for newly built dwellings	£199,903	£254,890	£292,072	£336,694	£100,028	£157,027	£197,631	£245,955
MONTHLY RENT								
Lower quartile private rent	£1,101	£1,351	£1,742	£2,708	£718	£937	£1,146	£1,454
Affordable Rent	£708	£855	£972	£1,364	£462	£593	£640	£732
Social Rent	£498	£599	£697	£869	£325	£415	£458	£467

Income Needed for Home Ownership

- 4.6 The income needed to purchase Market Housing will depend on the house price together with the mortgage income multiplier and the available deposit (or percentage loan-to-value). For example, if we consider a property costing £300,000, and assume the buyer could afford a deposit of 10%. The outstanding mortgage requirement would be £270,000. Using a typical income multiple of 3.5x we can calculate an income of just over £77,100 would be needed ($77,143 \times 3.5 = £270,000$).
- 4.7 Whilst some households will have higher deposits available and others will seek to extend their borrowing as far as possible, the initial assumptions of a 10% deposit and a 3.5 x mortgage multiplier provides a reasonable indication of the income that first-time buyer households are likely to need. Based on these assumptions, Figure 32 shows incomes needed to buy existing dwellings at lower quartile house prices, though households will tend to have higher deposits when buying larger homes (often equity from the sale of another property) so it is relatively artificial to consider incomes in isolation. Figure 32 also shows the income needed for a 50% equity share in a newly built dwelling, which is assumed to be the threshold for Affordable Home Ownership.

Income Needed to Rent Housing

- 4.8 The income needed to rent housing will depend on the monthly rent together with the income multiplier allowed for housing costs. The previous DCLG Strategic Housing Market Assessments Practice Guidance (Version 2, August 2007)⁴ stated:
- “A household can be considered able to afford market house renting in cases where the rent payable was up to 25 per cent of their **gross household income**” (page 42)*
- 4.9 However, this previous Guidance was rescinded in 2014 following the publication of the NPPF and PPG. Although the PPG does not propose a specific multiplier for assessing housing costs, it notes that *“care should be taken ... to include only those households who cannot afford to access suitable housing in the market”*.⁵
- 4.10 The English Housing Survey (EHS) provided information about the percentage of gross household income that households spent on their housing costs in 2015-16.⁶ Based on the Household Reference Person and partner, households renting privately spent on average 41% of their income (including housing benefit) on rent, compared to an average of 31% for households in social rent. Basing this on all income earners (irrespective of whether they contribute to the housing cost) reduced the average to 35% at that time. Therefore, many households pay considerably more than 25% of gross household income on their housing costs.
- 4.11 The proportion of household income allocated to housing costs is necessarily based on a judgement. At the lower end of the range, the previous DCLG Practice Guidance sets out a percentage of 25%. However, as the EHS identifies that households renting privately spend 41% of their gross income **on average**, there must be many households currently spending more than 41% of their income on housing costs (which will be offset against others spending lower proportions). This leads to our judgement that **35% of income** provides a reasonable basis for assessing the **maximum** that households should expect to pay for their housing costs.

Housing Affordability Thresholds

- 4.12 Based on the above assumptions, Figure 32 shows the annual incomes needed to afford Market and Affordable Home Ownership, as well as Market Rent, Affordable Rent and Social Rent.

Figure 32: Annual household income thresholds for housing options in Bath City and North East Somerset by number of bedrooms (Note: Calculated based on the house prices and rents set out in Figure 31)

Annual Household Income Affordability Thresholds	Bath City				North East Somerset			
	1 bed	2 beds	3 beds	4+ beds	1 bed	2 beds	3 beds	4+ beds
ANNUAL INCOME TO OWN <i>10% deposit, 3.5x multiplier</i>								
Market Home Ownership	£68,489	£84,989	£105,224	£190,979	£46,875	£60,273	£76,590	£118,286
Affordable Home Ownership	£51,404	£65,543	£75,104	£86,579	£25,721	£40,378	£50,819	£63,246
ANNUAL INCOME TO RENT <i>35% of gross income, no HB</i>								
Market Rent	£37,733	£46,334	£59,711	£92,832	£24,613	£32,121	£39,275	£49,840
Affordable Rent	£24,260	£29,313	£33,340	£46,751	£15,825	£20,321	£21,930	£25,100
Social Rent	£17,074	£20,528	£23,897	£29,801	£11,138	£14,231	£15,718	£16,000

⁴ <https://www.gov.uk/government/publications/strategic-housing-market-assessments-practice-guidance>

⁵ PPG ID 2a-020-20190220

⁶ <https://www.gov.uk/government/statistics/english-housing-survey-2015-to-2016-headline-report>

Current Unmet Need

- 4.13 In terms of establishing the current unmet need for Affordable Housing, the PPG draws attention to those types of households considered to be in housing need; whilst emphasising the need to avoid double-counting and including only those households unable to afford their own housing.

How can the current unmet gross need for affordable housing be calculated?

Strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market.

The unmet (gross) need for affordable housing by assessing (sic) past trends and current estimates of:

- » *the number of homeless households;*
- » *the number of those in priority need who are currently housed in temporary accommodation;*
- » *the number of households in over-crowded housing;*
- » *the number of concealed households;*
- » *the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and*
- » *the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.*

Care should be taken to avoid double-counting, which may be brought about with the same households being identified on more than one transfer list, and to include only those households who cannot afford to access suitable housing in the market.

Planning Practice Guidance, ID 67-006-20190722

- 4.14 To assess the current need for Affordable Housing, the number of households who are not suitably housed and who are unable to afford Market Housing must be identified. Figure 33 sets out the current need for Affordable Housing and identifies 2,128 households living in unsuitable housing and unable to afford. It will be important to update this analysis once data is available for 2025, to align with the base date of the Plan.

Figure 33: Assessing current unmet need for Affordable Housing in 2024 (Sources: Census data, ONS; Homelessness statistics, Local Authority Housing Statistics, MHCLG)

Current unmet housing need from households unable to afford to rent or buy	Source	Without a separate home	Occupying Market Housing	Occupying Affordable Housing	Total Households
Homeless households in priority need Living in temporary accommodation	Homelessness statistics	<i>Nightly paid</i> 39	PRs or PSL 5	LA/RSL stock 30	74
Homeless households in priority need Without temporary accommodation provided	Homelessness statistics	5	-	-	5
Households living in overcrowded housing Households living in overcrowded housing	Census data	852	254	450	1,556
Other households in unsuitable housing Needing to move on medical or welfare grounds or where failure to meet the identified need would cause hardship	LA Housing Statistics returns	-	439	54	493
TOTAL CURRENT UNMET NEED		896	698	534	2,128
Bath City		558	409	307	1,274
North East Somerset		338	289	227	854

Households that Aspire to Homeownership

4.15 When considering the number of households from other tenures in who aspire to homeownership, data from the English Housing Survey shows that over half (56.6%) of households who rent privately and a fifth (21.1%) of those in social rented housing plan to own in the long-term.

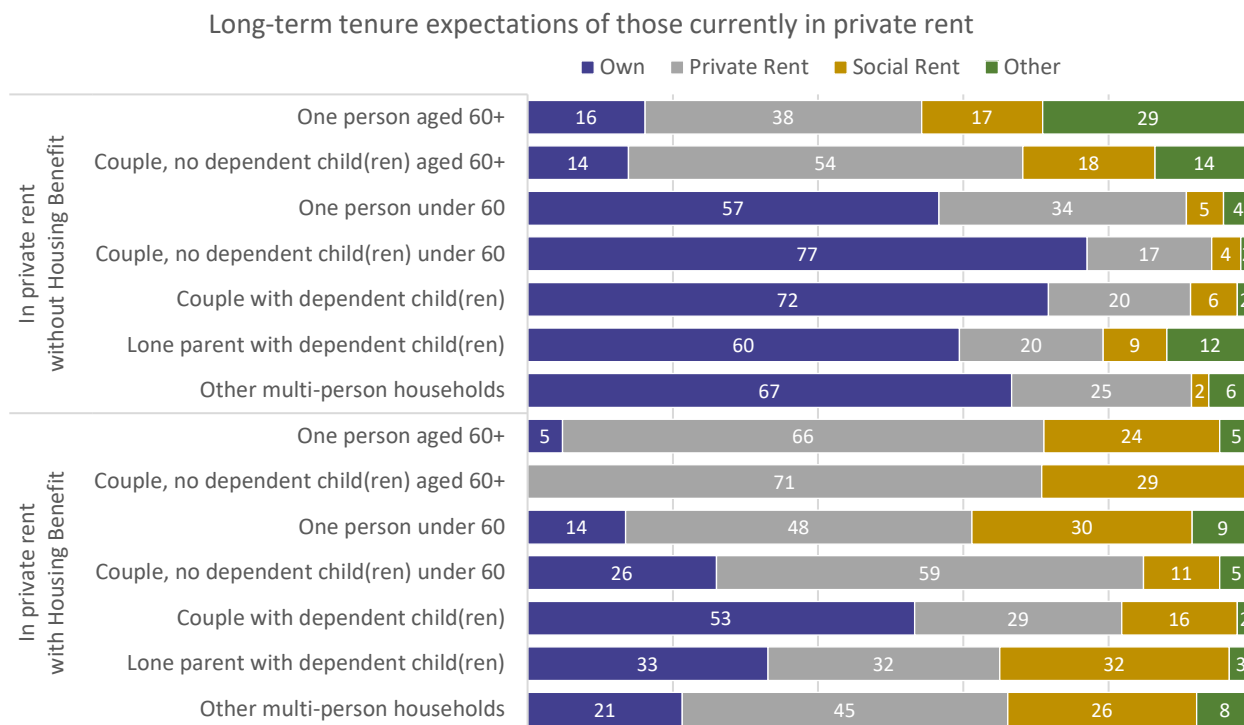
Figure 34: Long-term tenure aspirations (Source: English Housing Survey, MHCLG)

Current tenure	Long-term plan			
	Owner occupier	Rent from private landlord	Rent from social landlord	Other
Owner occupied	97.1%	0.3%	0.5%	2.1%
Rent from private landlord	56.6%	29.2%	9.5%	4.7%
Rent from social landlord	21.1%	1.4%	74.2%	3.3%

4.16 These figures relate to aspirations only and there is no test within the data as to whether this aspiration is affordable. It is therefore worth considering the responses of those currently in private rent in more detail with a view to understanding the types of household aspiring to buy.

4.17 Figure 35 shows long-term tenure aspirations of different types of households currently renting privately either with or without Housing Benefit.

Figure 35: Long-term tenure expectation for those renting from a private landlord with and without Housing Benefit support (Source: English Housing Survey, MHCLG. Note: Own includes shared ownership)



4.18 Through combining data on the number of households of each type in each age group living in private rented housing and paying their own rent with the aspiration data from the EHS, Figure 36 establishes the number of existing households that aspire to homeownership. It is important to recognise that all of these households can afford to rent Market Housing and therefore none would have previously been counted as needing Affordable Housing.

Figure 36: Existing households renting from a private landlord without Housing Benefit that aspire to homeownership by household composition and age of household reference person (Source: ORS Model. Note: Figures may not sum due to rounding)

Household composition	15-24	25-34	35-44	45-54	55-64	65+	Total
One-person household	147	670	480	358	213	37	1,906
Couple family without children	176	1,238	431	229	143	12	2,228
Couple family with dependent children	9	389	589	351	40	3	1,380
Lone parent family with dependent children	11	209	113	100	11	0	444
Other household types	857	600	185	108	55	22	1,827
TOTAL HOUSEHOLDS	1,200	3,107	1,798	1,145	462	73	7,785
Bath City	1,095	2,203	1,145	707	221	3	5,374
North East Somerset	105	904	652	438	241	71	2,411

- 4.19 We can therefore conclude that there are around 7,800 households currently resident in Bath & North East Somerset who do not own their own home but aspire to do so. Of these households, most (78%) are aged under 45 including around 3,100 (41%) aged 25-34.
- 4.20 It is important to recognise that the figures for those who aspire to homeownership are based upon those households who can afford to rent Market Housing without Housing Benefit support. But not all of these households would necessarily choose to buy Affordable Home Ownership, and others may not need Affordable Home Ownership if their circumstances change to such a degree that they can afford to buy without financial assistance. Furthermore, it is also important to recognise that the identified demand could only be realised if Affordable Home Ownership products could be delivered at prices that were genuinely affordable in the area based on local incomes.
- 4.21 Neither the NPPF nor PPG identify that any affordability criteria should be applied to those households who aspire to homeownership but cannot afford to buy their own home. However, it is appropriate to consider the extent to which these households could plausibly afford Affordable Home Ownership products if they were provided. It is also important to recognise that income limits apply to some products – for example, the maximum household income for shared ownership outside London is currently £80,000.
- 4.22 Figure 37 sets out the key stages of the analysis, which identifies that around 1,200 currently renting from a private landlord aspire to homeownership, and whilst they couldn't afford Market Housing they are likely to form an effective demand for Affordable Home Ownership.

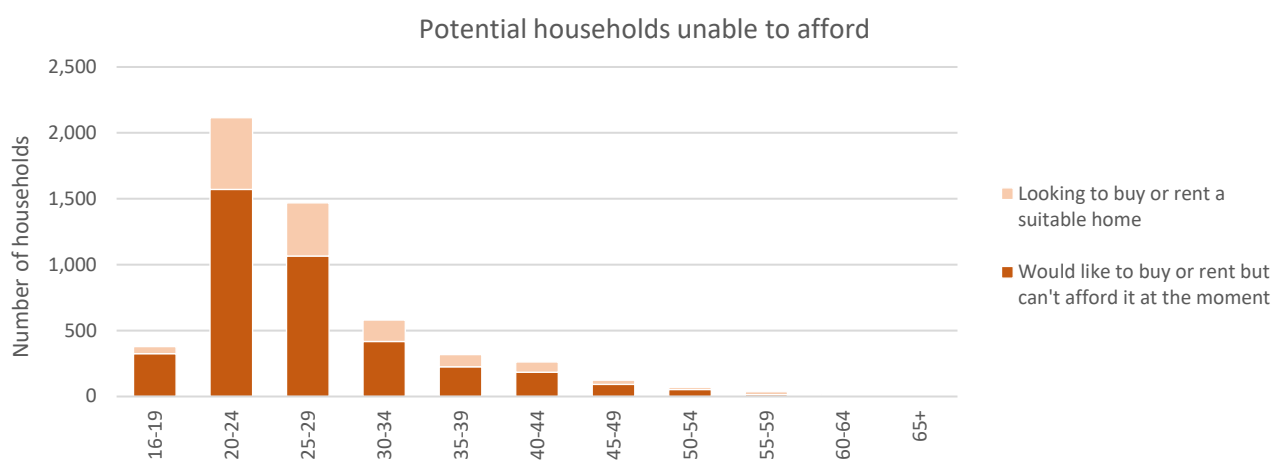
Figure 37: Need from households that aspire to homeownership but cannot afford to buy Market Housing in Bath & North East Somerset (Source: ORS Model. Note: Figures may not sum due to rounding)

Current unmet need from households that aspire to homeownership but cannot afford to buy	Bath City	North East Somerset	Total
Households renting privately that aspire to homeownership	5,374	2,411	7,785
Less households unable to afford based on 50% of the lower quartile price for newly built dwellings	3,427	1,157	4,584
Less households with savings of less than £5,000	1,122	899	2,022
HOUSEHOLDS THAT ASPIRE TO OWN BUT CANNOT AFFORD TO BUY likely to form an effective demand for Affordable Home Ownership	825	354	1,179

Need from Potential Households

- 4.23 The previous analysis established that there were around 5,400 potential households in the area that want to live independently but do not occupy a separate home at the base date of the Plan in 2025 (Figure 23). Many of these potential households have not been able to form a new household as they are unable to afford to rent or buy suitable housing.
- 4.24 Applying age-specific EHS rates to the identified potential households shows that around 4,000 would not be able to afford suitable housing, which includes around 1,100 in Bath City and 2,900 in North East Somerset. It is therefore important that their needs are counted when establishing the overall number of households that are currently unable to afford.

Figure 38: Potential household unable to afford suitable housing (Source: ORS Model)



Newly Arising Need

- 4.25 In terms of establishing the newly arising need for Affordable Housing in future years, the PPG draws attention to new household formation (in particular the proportion of newly forming households unable to buy or rent in the market area) as well as the number of existing households falling into need.

How can the number of newly arising households likely to be in affordable housing need be calculated (gross annual estimate)?

Projections of affordable housing need will have to reflect new household formation, the proportion of newly forming households unable to buy or rent in the market area, and an estimate of the number of existing households falling into need. This process will need to identify the minimum household income required to access lower quartile (entry level) market housing (strategic policy-making authorities can use current costs in this process, but may wish to factor in anticipated changes in house prices and wages). It can then assess what proportion of newly forming households will be unable to access market housing.

Planning Practice Guidance, ID 2a-021-20190220

- 4.26 To assess the projected future Affordable Housing need, it is necessary to consider need from new households (in particular the proportion of newly forming households unable to rent or buy Market Housing) as well as the number of existing households falling into need. It is also necessary to consider the number of additional households that aspire to homeownership that cannot afford to buy.

- 4.27 The ORS Model establishes future Affordable Housing need based on the dwelling-led household projections together with a range of secondary data sources to profile how the stock will have to change to meet the needs of the future population. The Model provides robust and credible evidence over the full Plan period and recognises how housing market trends and drivers are likely to impact on the appropriate housing mix.
- 4.28 The Model recognises that the proportion of households unable to buy or rent in the market area will not be the same for all households, so the appropriate proportion is determined separately for each household type and age group. The affordability percentages in Figure 39 are calculated using detailed information on existing households living in Bath & North East Somerset from Census data, alongside administrative data published by DWP about housing benefit claimants. For each type of household in each age group, the table identifies the percentage of households that are unable to afford their housing costs based on them either occupying Affordable Housing or receiving housing benefit to enable them to afford Market Housing.

Figure 39: Assessing affordability by household type and age (Source: Census data, ONS; Housing Benefit claimants, DWP)

Percentage of households unable to afford to rent or buy	16-24	25-34	35-44	45-54	55-64	65+
BATH CITY						
One-person household	27%	13%	22%	32%	32%	31%
Couple family without children	4%	2%	5%	10%	9%	11%
Couple family with dependent children	40%	17%	11%	8%	10%	22%
Lone parent family with dependent children	73%	63%	52%	39%	33%	71%
Other household types	5%	6%	24%	31%	28%	20%
NORTH EAST SOMERSET						
One-person household	24%	11%	16%	22%	19%	19%
Couple family without children	4%	2%	4%	6%	5%	6%
Couple family with dependent children	61%	17%	11%	7%	8%	20%
Lone parent family with dependent children	75%	54%	51%	38%	29%	63%
Other household types	10%	9%	23%	23%	19%	11%

- 4.29 Based on the dwelling-led projections, the LHNA analysis identifies the annual need from new households unable to afford to rent or buy and existing households falling into need. This increase must be offset against changes to households previously identified as being in need.
- 4.30 The annual net increase in households unable to afford to rent or buy suitable housing is 203 per year, with a further 67 households likely to have formed in Market Rent who aspire to homeownership, cannot afford buy, but are likely to have sufficient income and savings to afford Affordable Home Ownership.

Figure 40: Summary annual components of household growth 2025-43 (Source: ORS Model. Note: Figures may not sum due to rounding)

Projected future need from households needing Affordable Housing	Bath City	North East Somerset	Total
Net increase in households unable to afford to rent or buy suitable housing	54	149	203
Need from additional households aspiring to homeownership that cannot afford to buy	40	27	67
NET ANNUAL NEED based on the increase in households needing Affordable Housing	94	176	270

Households Needing Affordable Housing

4.31 Figure 41 summarises the LHNA analysis and sets out the information sources used at each stage, which identify that there will be a need to provide Affordable Housing for a total of 11,600 households.

Figure 41: Current unmet need and future need from households needing Affordable Housing in Bath & North East Somerset 2025-2043 (Source: ORS Model. Note: Figures may not sum due to rounding)

Total need from households needing Affordable Housing	Step	Source	Bath City	North East Somerset	Total
CURRENT NEED					
Current unmet need from households unable to afford	A	Figure 33	1,274	854	2,128
Less households occupying Affordable Housing	B	Figure 33	534	307	227
Households aspiring to own who cannot afford to buy	C	Figure 37	825	354	1,179
Potential households that want to live independently	D	Figure 38	1,104	2,852	3,955
Net current need	E	A - B + C + D	2,895	3,833	6,728
FUTURE NEED					
Net annual need	F	Figure 40	94	176	270
Net future need over the 18-year period 2025-43	G	F × 18	1,692	3,167	4,859
TOTAL NEED 2025-43	H	E + G	4,587	7,000	11,587
Average annual need	I	H ÷ 18	255	389	644

4.32 The LHNA identifies a current unmet need from around 2,100 households that are unable to afford to rent or buy suitable housing. Some of these households occupy Affordable Housing and taking account of the properties they would vacate reduces the net need.

4.33 In addition to the households unable to afford, there are around 1,200 households currently renting their homes who aspire to own but cannot afford to buy; and of the potential households identified that want to live independently that have not previously been counted, around 4,000 have been unable to form as they cannot afford to rent or buy suitable housing. This yields an overall current need from around 6,700 household at the start of the Plan period.

4.34 Over the 18-year Plan period, there will be additional need from new and existing households unable to afford to rent or buy suitable housing and new households that aspire to own but cannot afford to buy. Together, these yield an average annual net future need of around 270 households per year, which equates to a total net future need from around 4,900 households over the 18-year period 2025-2043.

4.35 The current need from 6,700 household and the future need from a further 4,900 households result in the total need from 11,600 households over the 18-year Local Plan period, 644 households per year on average. This includes all households unable to afford to rent or buy suitable housing, and all households who want to own but cannot afford to buy where Affordable Home Ownership would provide a suitable housing option.

4.36 The total need identified by the LHNA analysis is a net figure and therefore any future losses from the current stock (such as demolition, or sales through Right to Buy) would increase the number of affordable homes needed by an equivalent amount. The analysis also assumes that the number of households in receipt of Housing Benefit to enable them to afford Market Rent will not change.

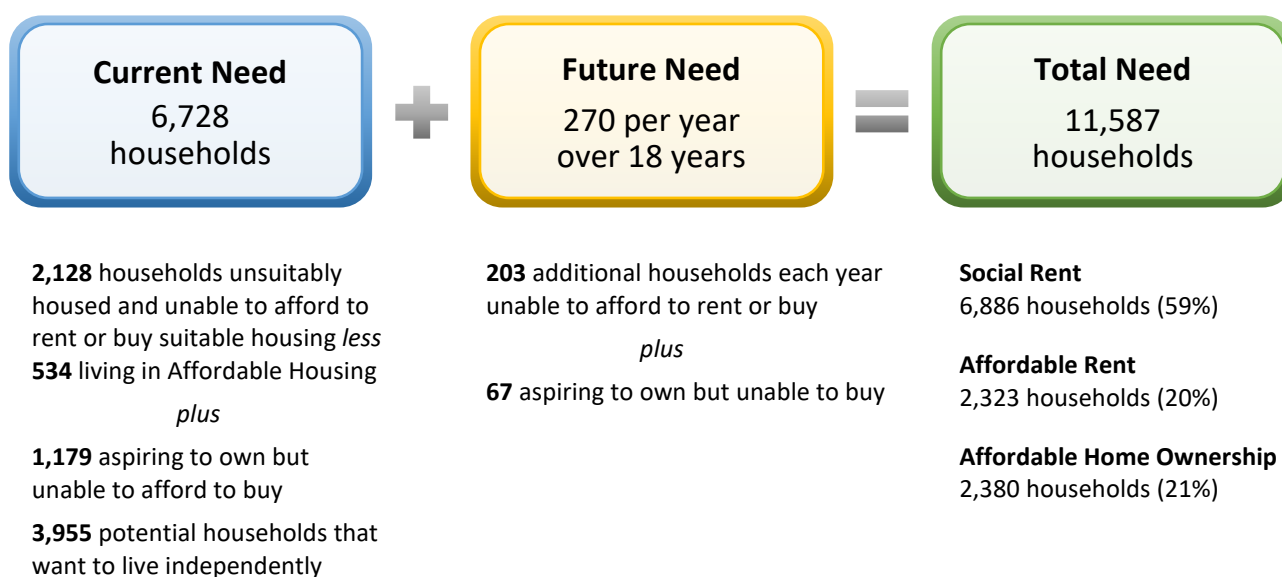
Private Rented Housing

- 4.37 Private rented housing (with or without Housing Benefit) does not meet the definitions of Affordable Housing and is not counted as Affordable Housing supply; however, households in receipt of Housing Benefit can afford their housing costs given that they receive a specific payment based on their rent, so they are not counted towards the need for Affordable Housing. However, if Housing Benefit support was no longer provided (or if there was not sufficient private rented housing available at a price they could afford) then this would increase the need for Affordable Housing.
- 4.38 As policy decisions about housing benefit support provided to households living in the private rented sector are determined by the Government, it will be necessary for the Council to consider the possible impact of any changes when determining the most appropriate Affordable Housing targets for the area.

Overall Need for Affordable Housing

- 4.39 Figure 41 summarises the LHNA analysis, which identifies a need to provide Affordable Housing for a total of 11,600 households over the 18-year Local Plan period 2025-2043.

Figure 42: Households needing Affordable Housing in Bath & North East Somerset 2025-2043 (Source: ORS Model. Note: Figures may not sum due to rounding)



- 4.40 Households needing Affordable Housing represent 46% of the total household growth identified by the dwelling-led projections (Figure 25, Scenario B). Given the current need from around 6,700 households at the start of the Plan period, it would seem appropriate for the Council to aim to maximise Affordable Housing delivery in the early years of the Plan where possible.
- 4.41 It is important to recognise that the overall number of dwellings that need to be provided will inevitably be higher than the 11,600 households identified, as there will always be a proportion of unoccupied dwellings due to transactional vacancies. **The LHNA analysis has identified need for around 12,300 dwellings to be delivered as Affordable Housing over the 18-year Local Plan period 2025-2043, equivalent to 46% of the overall housing need identified by the standard method calculation.**

Future Mix of Affordable Housing

4.42 Figure 43 provides a breakdown of the identified need for Affordable Housing based on the number of bedrooms needed and the type of housing that households would be able to afford, calculated using the affordability framework previously set out (Figure 30).

Figure 43: Total need for Affordable Housing by type of Affordable Housing and number of bedrooms 2025-2043 (Source: ORS Model. Note: Figures may not sum due to rounding)

Number of dwellings	Social Rent	Affordable Rent	Affordable Home Ownership	Total
BATH CITY				
1 bedroom	1,489	114	596	2,199
2 bedrooms	655	218	506	1,380
3 bedrooms	414	179	242	835
4 bedrooms	114	44	141	299
5+ bedrooms	59	23	73	156
BATH CITY TOTAL	2,731	579	1,558	4,868
NORTH EAST SOMERSET				
1 bedroom	1,824	296	164	2,284
2 bedrooms	1,475	562	242	2,279
3 bedrooms	1,089	597	271	1,957
4 bedrooms	397	211	110	718
5+ bedrooms	106	56	29	191
ALL DWELLINGS	4,892	1,722	815	7,429
BATH & NORTH EAST SOMERSET				
1 bedroom	3,313	410	759	4,483
2 bedrooms	2,131	780	748	3,659
3 bedrooms	1,503	776	513	2,792
4 bedrooms	511	255	250	1,016
5+ bedrooms	165	79	103	347
OVERALL TOTAL	7,623	2,301	2,374	12,297

4.43 The LHNA analysis identifies a need for around 9,900 dwellings to be provided as rented Affordable Housing, comprising 2,300 dwellings (23%) for households that could afford Affordable Rent (without Housing Benefit and spending no more than 35% of their income on rent) and 7,600 dwellings (77%) provided as Social Rent for households that could not afford Affordable Rent.

4.44 When considering the future delivery of affordable homes for rent, this does not necessarily mean that 23% of housing should be provided as Affordable Rent with the remainder provided as Social Rent on each individual site. Instead, the Council should aim to achieve this balance overall across all of the rented Affordable Housing that is delivered. It will therefore be important for the Council to take account of all of the available evidence when determining the appropriate mix of housing to be provided on individual sites, in order to ensure that the overall balance is achieved.

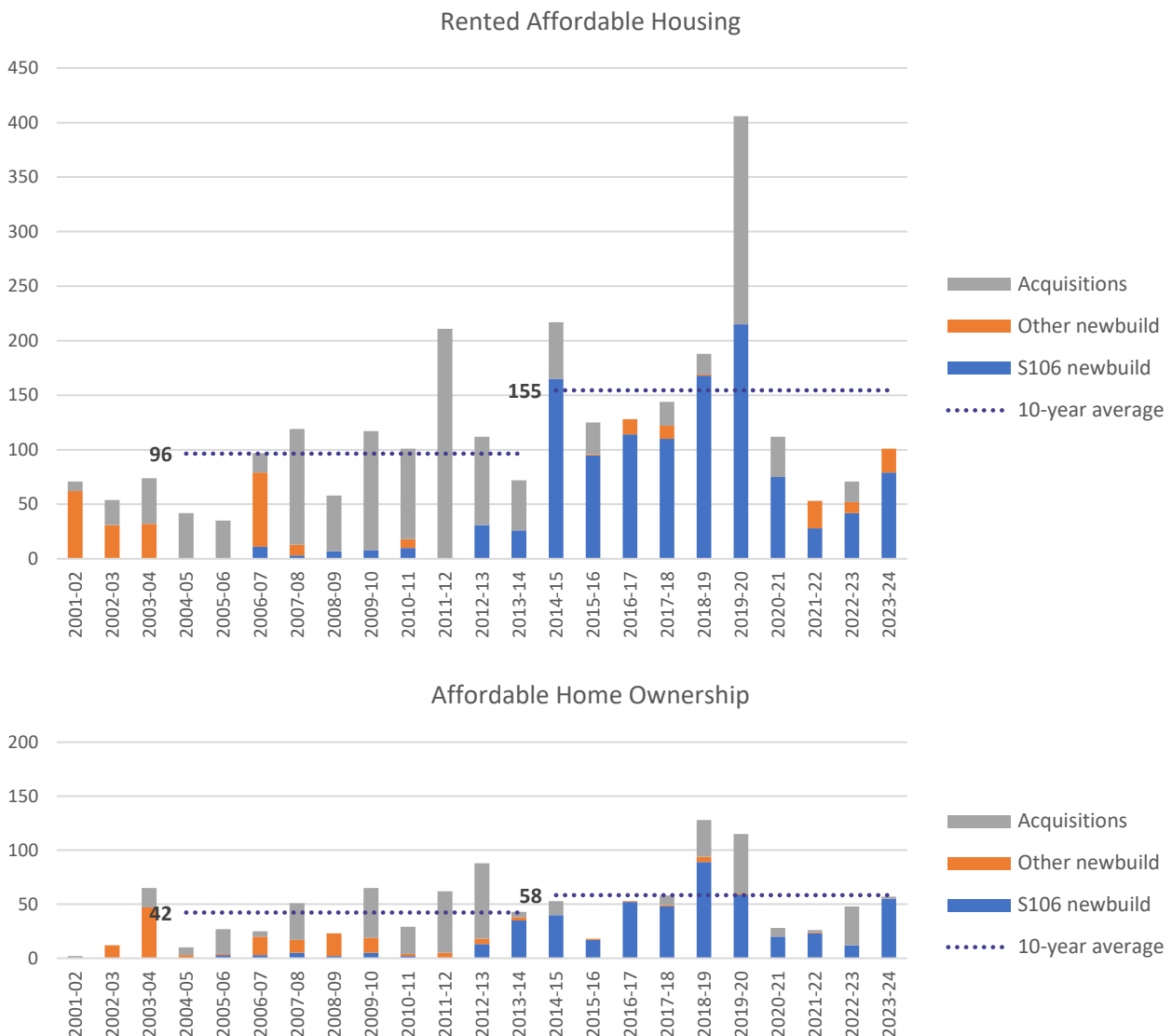
4.45 The remaining 2,400 dwellings identified by the analysis would be for households that aspire to own but cannot afford to buy, where they have been assessed as having sufficient income and savings to afford Affordable Home Ownership. It should be noted that other households that aspire to own are unable to afford Affordable Home Ownership, so this would not provide a suitable housing option, but these households have not been counted as needing rented Affordable Housing as they can afford Market Rent.

4.46 When considering the size of Affordable Housing needed, 36% of households would need 1 bedroom and a further 30% would need 2 bedrooms, which will include some that need specialist older person housing. There is a need to provide around 1,400 dwellings as homes for larger families (1,000 with 4 bedrooms and over 300 with 5 or more bedrooms). Whilst this represents only 11% of the total need, this still represents around 75 homes every year over the 18-year Plan period.

Setting the Need for Affordable Housing in Context

4.47 Figure 44 summarises the annual supply of Affordable Housing that has been delivered in the local area each year since 2001-02.

Figure 44: Affordable Housing supply by source and tenure, 2001-02 to 2023-24 (Source: Live tables on Affordable Housing supply, MHCLG)



- 4.48 Between 2014-15 and 2023-24, a total of 2,129 affordable homes were delivered in the local area, representing an average of 213 homes per year. This average comprised 155 affordable homes for rent and 58 for affordable homeownership. The majority of these homes – 1,506 dwellings (71%) – were newbuild properties secured through Section 106 contributions. A further 528 newbuild homes (25%) were delivered through alternative mechanisms, while 95 homes (4%) were acquired through purchases of Market Housing from the existing stock.
- 4.49 The current supply of Affordable Housing falls significantly short of the annual need identified by the LHNA, 551 affordable homes for rent and 132 for affordable homeownership each year (Figure 43). As a result, not enough permanent homes are being delivered to accommodate homeless households currently living in temporary accommodation. In addition, other households in need of Affordable Housing are facing lengthy waiting times – often many years for those needing larger family homes.
- 4.50 Census data shows that households renting a home with four or more bedrooms from a social landlord increased from 326 to 430 between 2011 and 2021 – an increase of 104 over 10 years, an average of only 10 per year. Given this context, delivering the identified need for approximately 1,400 family homes with four or more bedrooms over the 18-year plan period – equivalent to an average of more than 75 larger homes each year – is likely to require considerable effort. The Council will therefore need to consider whether the delivery of larger affordable homes should be prioritised, especially given the difficulties that are experienced when trying to secure suitable permanent accommodation for families needing larger homes.
- 4.51 The LHNA has identified that the Council will need to plan for a step-change in housing delivery to meet the minimum number of homes needed under the new standard method. The annual LHN figure has been calculated at 1,501 dpa, whereas recent housing delivery has averaged 830 dpa (Figure 8). There will therefore need to be an increase of around 80% in the overall number of homes delivered each year, and increasing the overall number of homes delivered will help support the provision of more Affordable Housing given that the majority of new affordable homes are typically secured through Section 106 contributions linked to Market Housing developments.
- 4.52 Given that recent Affordable Housing delivery has averaged 213 dpa (Figure 44) an 80% increase in the overall number of homes delivered could therefore be expected to increase the number of affordable homes delivered to around 385 per year on a pro rata basis. However, moving forwards it seems likely that a larger proportion of housing will be provided on greenfield sites, and these tend to be able to deliver higher proportions of Affordable Housing. Therefore, the increase in overall housing delivery is likely to yield more affordable homes than suggested by the pro rata uplift. In this context, paragraph 67 of the December 2024 version of the NPPF states that any housing delivered on land that is proposed to be released from the Green Belt should “*require at least 50% of the housing to be affordable*” (unless that would make the development of the site unviable). The Council should therefore consider the likely impact of this on the future Affordable Housing supply.
- 4.53 Given that the LHNA has identified a need for 683 affordable homes per year (Figure 43) it will be important for the Local Plan to seek to maximise the delivery of Affordable Housing. However, the Council will need to consider the specific policy approach and undertake an assessment of development viability to inform the relevant targets and thresholds for different types of sites.
- 4.54 Whilst it remains likely that Section 106 contributions will continue to deliver the majority of new Affordable Housing, the Council should also continue to maximise provision of Affordable Housing through other mechanisms, including acquisitions of existing properties and working with Registered Providers to deliver sites with 100% Affordable Housing.

5. Housing Need for Different Groups

- 5.1 The NPPF (December 2024) requires that local planning authorities consider the housing needed for a range of different groups in the community, so that any specific needs can be reflected in planning policies.

*63. 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); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes*

National Planning Policy Framework, December 2024 (emphasis added)

- 5.2 The needs of those who require Affordable Housing (including Social Rent) have already been established. This chapter considers the specific housing needs of the other identified groups in turn, except for:
- » Service families, as they are likely to have a minimal impact on the local housing market given that there is no military base in the local area
 - » Travellers, as a separate Gypsy and Traveller Accommodation Assessment has considered their needs as set out in Planning Policy for Traveller Sites.

Housing for Families with Children

- 5.3 Figure 27 previously identified a projected increase of 5,500 single families with children under Scenario B (22% of the household growth) over the 18-year period 2025-2043. Around three quarters of these households were couple families (4,200) and the remaining quarter were lone parent families (1,300). Nevertheless, when considering the need for additional family housing it is important to recognise that many couples without children and one-person households will also occupy family housing.
- 5.4 On the basis of current occupancy trends, it is likely that many older couples without children and one-person households will continue to live in family homes after their adult children have left to live independently. Where the current occupiers of family housing choose not to move, existing properties will not be vacated so will be unavailable for new families with children, therefore more family housing will need to be provided.
- 5.5 The analysis identifies that in addition to the family homes needed to accommodate the projected increase of up to 5,500 families with children, there would also be need to provide an additional 8,400 family homes (5,900 with 3 bedrooms and 2,500 with 4 or more bedrooms) given the increase in households without children who are likely to stay in their current family home based on current trends. It will therefore be necessary to provide family housing for around 13,900 households (equivalent to 55% of the projected household growth) based on current occupancy patterns continuing in future.
- 5.6 Although many older households do not want to leave their family home and are unlikely to move, it is likely that a proportion will move to specialist older person housing and others would choose to move within the general housing stock if there were suitable homes available that better met their needs – so there could be opportunity for existing family homes to be vacated if the right type of general needs housing could be provided for older households.

Looked After Children

- 5.7 The Government issued a Written Ministerial Statement in May 2023 which stressed the importance of providing accommodation for looked after children, referring to the NPPF requirement to consider the needs of different groups in the community and stating that Local Planning Authorities should “*consider whether it is appropriate to include accommodation for children in need of social services care*” as part of their LHNA.
- 5.8 The December 2024 NPPF now states at Footnote 26 that “*Evidence of need for looked after children can be found in the relevant local authority’s Children’s Social Care Sufficiency Strategy*”. Bath & North East Somerset Council has developed the “BaNES Looked After Children Sufficiency Strategy” to set out how it will meet its legal obligations regarding the care and placement of looked-after children.⁷ The strategy outlines how the Council intends to ensure there is a range of suitable accommodation available to meet the diverse and changing needs of children in its care.
- 5.9 The Council’s legal duties are underpinned by Section 22G of the Children Act 1989 (as amended by the Children and Young Persons Act 2008) which places a general duty on local authorities to take steps to secure, so far as reasonably practicable, sufficient accommodation within their area to meet the needs of looked-after children. This includes ensuring placements are appropriate to the individual needs of children and located within the authority’s area wherever it is consistent with their welfare.

Care Leavers

- 5.10 Interpreting the ministerial statement of May 2023 in an inclusive sense would also include assessing the need for young people leaving care. Figure 45 shows the accommodation arrangements and suitability of accommodation for young people currently aged 17 to 21 who were looked after children when aged 16.

Figure 45: Accommodation arrangements and suitability of accommodation for young people currently aged 17 to 21 who were looked after children when aged 16 by age group, 2024 (Source: Education Statistics, Department for Education)

	Aged 17-18	Aged 19-21
Independent living	< 5	25
Semi-independent, transitional arrangements	24	18
With parents or relatives	< 5	11
With former foster carers	17	8
Other type of accommodation	< 5	18
TOTAL	46	80
Accommodation considered suitable	45	76

- 5.11 Based on this information, we can establish that 126 young people currently aged 17 to 21 were looked after when aged 16, equivalent to an average of 25 in each individual year of age. On this basis, it is expected that approximately 25 young people leaving care each year will require accommodation, representing a total of between 400 and 500 individuals over the 18-year period 2025-2043.
- 5.12 Although these needs will already be included within the overall need for Affordable Housing (Figure 41), more detailed planning and coordination with children and young people’s social care services will be necessary to ensure that care leavers are appropriately and suitably housed.

⁷ <https://democracy.bathnes.gov.uk/mgConvert2PDF.aspx?ID=80779>

Housing for Older People

- 5.13 The UK population is ageing, and people can expect to live longer healthier lives than previous generations, so the older population living in England is forecast to grow significantly over the next 20 years. Given this context, PPG recognises the importance of providing housing for older people.
- 5.14 Figure 46 identifies the type of dwellings occupied by households aged 75 or over in the local area based on 2021 Census data. The Census does not provide details about specialist older person housing, but information about this stock is maintained by the Elderly Accommodation Counsel.

Figure 46: Existing dwelling stock occupied by households aged 75+ living in Bath City and North East Somerset (Source: Census data, ONS; Specialist Older Person Housing based on data published by the Elderly Accommodation Counsel for 2024)

	Bath City				North East Somerset			
	Owner occupied	Private rented	Social landlord	TOTAL	Owner occupied	Private rented	Social landlord	TOTAL
DWELLINGS OCCUPIED BY HOUSEHOLDS AGED 75+								
1 bedroom	241	83	512	836	157	57	427	641
2 bedrooms	1,119	96	232	1,447	1,542	116	207	1,865
3 bedrooms	2,193	60	109	2,362	3,050	104	129	3,283
4 or more bedrooms	957	10	9	976	1,560	26	12	1,598
Total Households	4,510	249	862	5,621	6,309	303	775	7,387
SPECIALIST OLDER PERSON HOUSING UNITS								
Housing with Support	245	-	645	890	250	-	1,035	1,285
Housing with Care	50	-	309	359	136	-	60	196
Total Specialist Older Person Housing Units	295	-	954	1,249	386	-	1,096	1,481

- 5.15 The stock of specialist older person housing rented from a social landlord (2,050 homes) is higher than the number of households aged 75 or over living in one- and two-bedroom housing rented from a social landlord at the time of the Census (1,378 households) which suggests that a number of these homes are likely to have been occupied by households aged under 75.
- 5.16 The owner-occupied stock of specialist older person housing (681 homes) represents just over a fifth (22%) of all one- and two-bedroom dwellings occupied by owner occupiers aged 75 or over. Nevertheless, as many older owner occupiers live in properties with three bedrooms or more, the specialist older person housing stock represents only 6% of households when considering all owner occupiers aged 75 or over.
- 5.17 PPG for “Housing for older and disabled people” was published in June 2019. This states:

The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector ... Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can also be useful. The assessment of need can also set out the level of need for residential care homes.

Planning Practice Guidance, ID 63-004-20190626

- 5.18 The Housing Learning and Improvement Network (LIN) has published a number of different online toolkits that have provided standardised rates for estimating demand for specialist older person housing products. These have been based on applying prevalence rates per 1,000 people aged 75 or over, as summarised in Figure 47.^{8,9} The table also presents baseline rates from a model developed by Sheffield Hallam University Centre for Regional Economic and Social Research (CRESR).¹⁰

Figure 47: Benchmark Figures for Specialist Older Person Housing

Form of Provision <i>Demand per 1,000 persons aged 75+</i>	More Choice, Greater Voice Toolkit 2008	Housing in Later Life SHOP Resource Pack 2011	SHOP@ National Benchmark 2016	Housing LIN Review Proposals 2016	Sheffield Hallam CRESR Model 2017
Housing with Support: Retirement Living or Sheltered Housing	125	180	100	100	153.2
Housing with Care: Extra Care or Enhanced Sheltered	45	65	14	35 "Proactive" rate	19.5
Sub-total	170	245	114	135	172.7
Residential care	65	-	43	40	-
Nursing care	45	-	45	45	-
Sub-total	110	-	88	85	110.8
OVERALL TOTAL	280	-	202	220	283.5

- 5.19 These rates provide a useful framework for understanding the potential demand for different forms of older person housing, but there is limited detail about the derivation of the figures published by the Housing LIN.
- 5.20 The More Choice, Greater Voice toolkit recognises that the suggested framework simply:
- "...represents an attempt to quantify matters with explicit numerical ratios and targets. It is contentious, but deliberately so, in challenging those who must develop local strategies to draw all the strands together in a way that quantifies their intentions."* (page 44)
- 5.21 Similarly, the SHOP resource pack acknowledged that the framework simply provides a baseline, which extrapolates *"...crude estimates of future demand from existing data"* (page 36) and the 2016 Review acknowledged that the Housing in Later Life report had *"suggested a large increase in leasehold housing for older people which were not substantiated at the time"* (page 4).
- 5.22 In contrast, the baseline rates for the CRESR model were established based on:
- "the level and composition of supply of age-exclusive housing, specialist housing, and care beds across the 100 English local authorities with the highest overall provision of each broad type of older person housing per 1,000 older people (aged 75 years or older)."* (page 26)
- 5.23 The Housing LIN states that the More Choice, Greater Voice Toolkit and SHOP Resource Pack are both now out-of-date and remain published only as an 'archived' resource for public policy interest purposes. The more recent SHOP@ analysis tool is provided through the Housing LIN consultancy services, where target prevalence rates are established based on local circumstances.

⁸ http://www.housinglin.org.uk/library/Resources/Housing/Support_materials/Reports/MCGVdocument.pdf

⁹ <http://www.housinglin.org.uk/library/Resources/Housing/SHOP/SHOPResourcePack.pdf>

¹⁰ <https://www.shu.ac.uk/centre-regional-economic-social-research/projects/all-projects/older-peoples-housing-care-and-support-needs-in-greater-cambridge-2017-2036>

- 5.24 The West of England authorities commissioned the Housing LIN to prepare a research study to help understand the need for extra care housing.¹¹ However, that study did not provide any quantitative estimates of need but instead only sought to consider the profile of need drawing on qualitative evidence. Whilst the study did not seek to provide any quantitative estimates of future needs, the existing supply of Extra Care Housing was considered, and the report concluded:

“that the prevalence of extra care housing in all four council areas is above both the South West and the England average prevalence. Based on the Housing LIN’s experience of the commissioning and provision of extra care housing across England, this should be interpreted as meaning that other areas of England are likely to have an under supply of extra care housing, rather than that there is an ‘oversupply’ of extra care housing in the West of England” (para 2.23)

- 5.25 The Housing LIN has since confirmed that *“there is evidence of an undersupply of ECH for sale across the WoE footprint”* although no details have been provided about the current level of need relative to existing provision in the local area, but the following benchmarks for tenure mix were identified by their 2016 Review based on the relative affluence or deprivation of the local authority area (Figure 48). Given that the English indices of deprivation ranked Bath & North East Somerset in the upper quartile of all local authorities,¹² the relevant tenure mix benchmark would be that proposed for the “Most Affluent” areas.

Figure 48: Proposed tenure mix for 2035 influenced by the affluence/deprivation ratio from the Housing LIN 2016 Review

SHOP@ MARKET SPLIT 2035 OPTIONS - DEPRIVATION/AFFLUENCE SPLIT								
	Most Deprived		Deprived		Affluent		Most Affluent	
	% Rented	% Leasehold	% Rented	% Leasehold	% Rented	% Leasehold	% Rented	% Leasehold
Sheltered, Age Exclusive	80	20	67	33	50	50	33	67
Housing with Care	75	25	50	50	33	67	25	75
Split based on quantiles of ONS deprivation index								
It can be expected that the % of public sector sheltered, age exclusive accommodation will retain a higher % than housing with care as there already exists a substantial level of current service provision.								

- 5.26 In contrast, the CRESR Model determined the tenure mix for each type of housing based on the proportion of residents aged 75 or over living in owner occupation, and the “above median” benchmarks apply for Bath & North East Somerset. These give rented-to-owned ratios of 69:31 for Sheltered Housing and 71:29 for Extra Care. However, as the CRESR Model is based on the mix of current provision, these benchmarks may not always reflect the most appropriate distribution when planning for additional provision.

“These tenure splits reflect current provision, which is significantly skewed towards social rented provision. If there is a desire to expand the provision of older people’s housing beyond current levels, this is likely to require disproportionate increases in ownership forms of supply. This is in part due to demand being focused on these ownership forms, particularly in areas with high levels of existing older homeowners.”

- 5.27 The LHNA is based on a rate of population growth that aligns with the LHN figure (Figure 24). Based on Scenario B, the dwelling-led projections identify that the population aged 75 or over is likely to increase from 20,300 to 29,500 persons over the 18-year period 2025-2043 (an overall increase of 45%) equivalent to an average of 511 persons per year.

¹¹ “West of England extra care housing improvement project”, Housing LIN, May 2023

¹² <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

- 5.28 Given this context, the population projections underlying the Local Housing Need figure show a substantial increase in the older population over the projection period. It is important to recognise that many of these extra residents will be aged 85 or over (a total of 10,100 persons by 2043) and they are likely to have increasingly complex care and support needs, including dementia, but also mental health and frailty related needs. It will therefore be necessary to consider the associated changes in the profile of housing need.
- 5.29 The household projections assume that the population aged 75 or over living in communal establishments will remain constant as a proportion for each 5-year age group, based on the rates identified by the Census. On this basis, there was an increase of 500 residents projected to need bedspaces provided in residential or nursing care homes (Figure 25, Scenario B). Bedspaces provided in Use Class C2 (residential institutions) will form part of the overall housing need and the allowance for C2 provision can be equivalised using the calculation set out in the Housing Delivery Test measurement rule book.¹³ The projected increase yields a need for around 300 dwellings once equivalised.
- 5.30 Figure 49 considers the need for specialist older person housing in Bath & North East Somerset over the 18-year period 2025-2043. This uses baseline rates based on existing supply and considers appropriate target rates taking account of the range of different benchmarks identified by the toolkits.
- » The target rates are based on the average of (i) the mid-point between the sub-area baseline and the baseline for the local authority as a whole, and (ii) the mid-point of the benchmark range
 - » Based on the identified target rates, the projected number of residents aged 75 or over at the end of the 18-year period in 2043 is used to establish the overall gross need
 - » The existing supply is then offset to identify the net housing need for the period to 2043.

Figure 49: Need for Specialist Older Person Housing to 2043 (Source: ORS Model. Note: Figures may not sum due to rounding)

Form of provision	Existing supply	Baseline rate	Benchmark range	Target rate	Total 2043	Change 2025-2043
BATH CITY						
Market Housing	295	35	-	54	626	+331
Housing with Care	50	6	7 - 26	11	114	+64
Housing with Support	245	29	47 - 67	43	512	+267
Affordable Housing	954	114	-	104	1,216	+262
Housing with Care	309	37	9 - 13	29	353	+44
Housing with Support	645	77	33 - 106	75	869	+218
TOTAL	1,249	150	-	157	1,842	+593
NORTH EAST SOMERSET						
Market Housing	386	32	-	54	987	+601
Housing with Care	136	11	7 - 26	14	266	+130
Housing with Support	250	21	47 - 67	40	721	+471
Affordable Housing	1,096	92	-	93	1,728	+634
Housing with Care	60	5	9 - 13	12	224	+164
Housing with Support	1,035	87	33 - 106	81	1,504	+469
TOTAL	1,481	124	-	153	2,715	+1,234

¹³ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

- 5.31 On this basis, there would be need to provide an additional **1,800 specialist older person housing units over the 18-year period 2025-2043** (equivalent to an average of 101 dwellings per year) of which 49% would need to be provided as Affordable Housing.
- 5.32 It is important to recognise that the LHNA analysis assumes a continuation of current types of housing, although it is uncertain if older people will aspire to these types of specialist housing in the future. Some types of specialist housing are already experiencing lower demand, and other, newer types of provision may appear to meet changing aspirations in the future.
- 5.33 The delivery of specific schemes for specialist older person housing need should be considered in partnership with other agencies, in particular those responsible for older person support needs. It will be important to consider other factors and constraints in the market:
- » **Demographics:** the changing health, longevity and aspirations of Older People mean people will live increasingly healthy longer lives and they may have different housing needs in future
 - » **New supply:** development viability of schemes, and the availability of revenue funding for care and support services, need to be carefully considered before commissioning any new scheme, so the Council and its partners will need to take account of this when deciding the mix of homes
 - » **Existing supply:** this may be inappropriate for future households and already experiencing lower demand, as other forms of specialist older person housing may be more suited to future needs
 - » **Other agencies:** any procurement of existing supply needs to be undertaken with other agencies who also plan for the future needs of Older People, particularly the Health Service and local authority Supporting People Teams.

Housing for Students

5.34 PPG includes specific reference to identifying the needs of students:

Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus ... Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements

Planning Practice Guidance, ID 67-004-20190722

5.35 When considering data from the Census, a total of 13,100 full-time students aged 16 or over were resident in the local area in 2001, which increased to 19,700 over the decade to 2011 (equivalent to a growth of 660 additional students each year) and further increased to 23,700 by 2021 (an average of 400 per year).

5.36 When considering student housing needs, it is necessary to consider those young people that would have normally been resident in the area separately from those choosing to move to the area specifically for study. Given this context, it is reasonable to assume that any full-time students aged 16 or 17 (as well as some already aged 18 on Census-day) would have been attending schools or sixth form colleges in the area, with most continuing to live with their parents or other family. Therefore, it is more appropriate to consider those full-time students that would have been aged 18 or over at the start of September.

5.37 Figure 50 identifies the type of accommodation occupied by full-time students based on Census data for the 20-year period 2001 to 2021. The figures are based on those aged 18 or over, which will exclude most of those students in schools and sixth form colleges. The overall number of full-time students is estimated to have increased from around 9,100 to 18,400 over the 20-year period – an extra 9,300 students resident in the local area, equivalent to a growth of 465 per year on average. The majority of the additional students have either been accommodated in communal establishments or are living in student households, with very little change in the number living with parents, living alone or in other types of household.

Figure 50: Full-time students aged 18 or over resident in Bath & North East Somerset in 2001, 2011 and 2021 by accommodation type (Source: Census data, ONS)

Accommodation type	Total 2001	Total 2011	Total 2021	Change 2001-2021	Annual average
Living with parents	1,273	1,863	1,947	+674	+34
Living in a communal establishment	2,109	3,259	5,193	+3,084	+154
Living in an all-student household	3,928	7,211	9,104	+5,176	+259
Living alone	366	574	574	+208	+10
Living in another household type	1,435	1,915	1,593	+158	+8
TOTAL	9,111	14,822	18,411	+9,300	+465

5.38 It is apparent that most of the all-student household increase occurred between 2001 and 2011 with growth of 84% in the number of students living in the general dwelling stock (an increase from 3,900 to around 7,200) and although the number of all-student households has continued to grow, the increase over the last decade was more moderate, with the total increasing to 9,100 students by 2021. In contrast, the number of students living in communal establishments (either halls of residence or other Purpose Built Student Accommodation) increased moderately between 2001 and 2011 (from 2,100 to 3,300) with more significant growth in the last decade (reaching 5,200 in 2021).

5.39 The shift from student growth placing pressure on general needs housing (with more all-student households) to student growth being accommodated in communal accommodation is largely a consequence of the Council’s decision to plan for student housing needs separately from the needs of the wider population. Based on the evidence from the Census, it is clear that this approach has reduced the pressure on general market housing with a more moderate growth of student households living in the private rented sector than would have otherwise been expected.

Higher Education Institutions

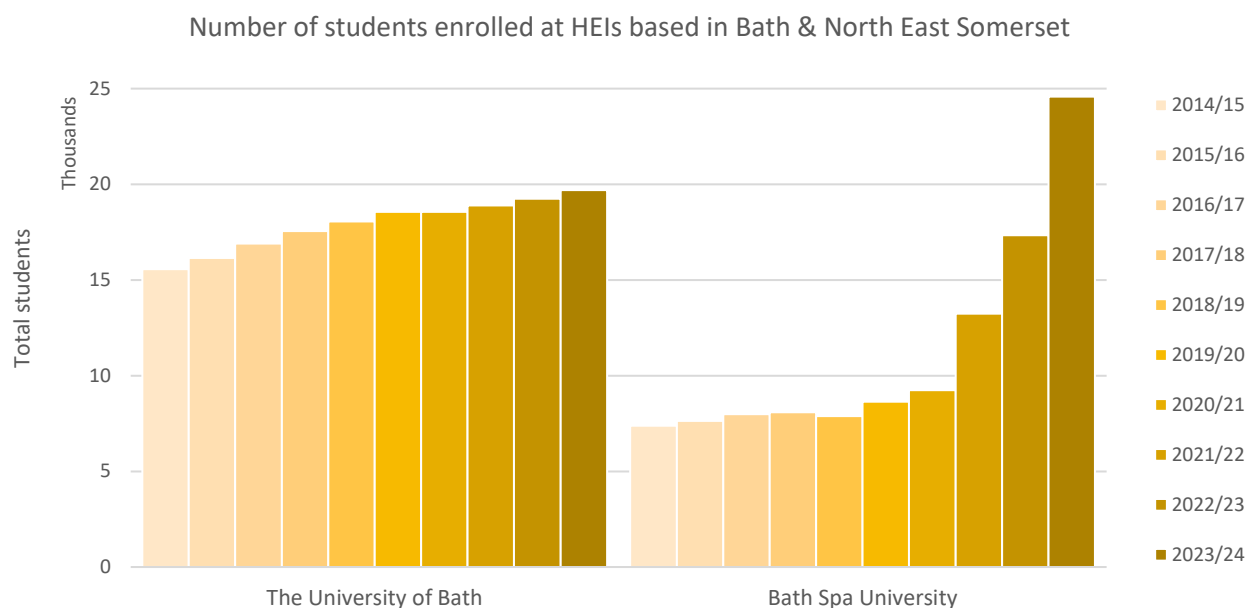
5.40 There are two Higher Education Institutions (HEIs) based in Bath & North East Somerset. Data published by the Higher Education Statistics Agency (HESA) shows that the University of Bath had around 19,700 students and Bath Spa University had around 24,600 students enrolled for the 2023/24 academic year. Most students at Bath Spa University are studying undergraduate degrees (91%) almost a quarter at the University of Bath (23%) are studying at postgraduate level (Figure 51).

Figure 51: Full-time equivalent students at Higher Education Institutions based in Bath & North East Somerset by level of study, 2023/24 (Source: Higher Education Statistics Authority. Note: Figures may not sum due to rounding)

	Undergraduate	Postgraduate research	Postgraduate taught	Total
University of Bath	15,190	1,405	3,105	19,695
Bath Spa University	22,310	85	2,190	24,585

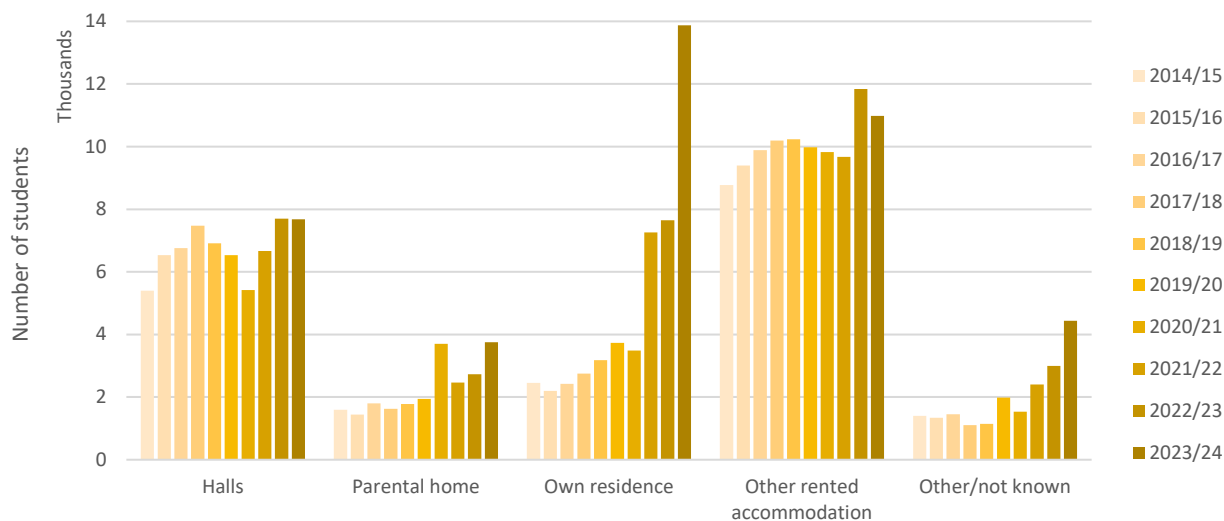
5.41 The number of students enrolled at the University of Bath has increased gradually year-on-year from 15,600 in 2014/15 up to 19,700 in 2023/24, an average increase of around 400 students each year. The number enrolled at Bath Spa University also increased gradually from 7,400 in 2014/15 up to 9,200 in 2020/21, equivalent to an average increase of around 300 students each year; however, more recently the number of students has increased significantly to 24,600 in 2023/24 (Figure 52).

Figure 52: Number of students enrolled at Higher Education Institutions based in Bath & North East Somerset by academic year, 2014/15 to 2023/24 (Source: Higher Education Statistics Agency)



5.42 Over 90% of students currently enrolled at both universities are on full-time courses with fewer than 10% studying part-time. Figure 53 shows the number of full-time students registered across the two HEIs from 2014/15 to 2023/24 by type of residence.

Figure 53: Number of full-time students registered at Higher Education Institutions in Bath & North East Somerset by type of residence, academic years 2014/15 to 2023/24 (Source: Higher Education Statistics Authority)



5.43 The HESA data shows that the number of students living in halls increased progressively to 7,500 in the 2017/18 academic year before falling back to 5,400 in 2020/21 (the year after the first Covid pandemic lockdowns) but the number has now returned to that previous peak and has remained stable at around 7,700 over the last two years.

5.44 There has been a sustained increase in the number living in the parental home, from 1,600 to 3,800 over the 10-year period, and there has also been an increase in students living in their own residence (normally their permanent residence, which may be owned or rented) which totalled around 13,900 in 2023/24 compared to 7,700 the previous year (2022/23) and 2,500 at the start of the 10-year period (2014/15). However, those students that continue to live in a permanent home – either their parental home or their own residence – are unlikely to add to the housing needs of the local area.

5.45 Students living in other rented accommodation (which typically refers to a more temporary arrangement, such as a yearly house share) do need to be considered in the context of the additional pressures likely to be placed on the housing market. This number increased from 8,800 to 10,200 over the 4-year period 2014/15 to 2018/19 (an average increase of 350 per year) before falling back to 9,700 in 2021/22. However, the number of students living in other rented accommodation has since increased to 11,000 in 2023/24.

5.46 It is also important to recognise that not all students that are enrolled will be resident in the local area. HESA data shows that the University of Bath had 1,475 distance learners, 2,255 students on placements, and 245 studying abroad, which together accounted for a fifth of all students enrolled for 2023/24 academic year. Similarly, Bath Spa University had 715 distance learners and 440 students on placements, which together accounted for 5% of all students.

5.47 As the number of students resident in the local area can vary considerably from year-to-year, it is more appropriate to focus on long-term growth. On this basis, the number of students not living in their permanent home – and living either in halls or other rented accommodation – increased from 14,200 in 2014/15 to 18,700 in 2024/25, which represents an overall increase of 4,500 equivalent to an average of 450 per year.

Student population growth

- 5.48 When projecting future population growth, the LHNA projections separated the future growth of the student population from the growth of the rest of the population. This is consistent with the longstanding approach that has been taken when assessing housing need in Bath & North East Somerset.
- 5.49 The previous Bath Strategic Housing Market Assessment (SHMA) 2018 Update assumed a growth of around 500 students per year, primarily informed by trends from the 20-year period 1996-2016 which identified that the overall number of students needing accommodation in Bath had increased from around 6,600 in 1996 to 16,700 by 2016, an average increase of around 500 per year.
- 5.50 Given the potential scale of future student population growth, the Council engaged with both universities about their future plans. The University of Bath expected student numbers to remain stable at around 18,500 over the 15-year period to 2035/36 and did not anticipate any increase in student housing need. Bath Spa University expected student numbers to increase from 8,200 to around 9,800 over the same 15-year period, which resulted in a likely need for around 1,000 additional student bedspaces (65 per year). This was notably lower than the trend-based estimate of 500 per year that was established by the SHMA Update in 2018.
- 5.51 The latest data on enrolment (Figure 52) shows that the number of students at the University of Bath has not stabilised at 18,500 students but has continued to increase in line with the well-established incremental growth trends. The growth of Bath Spa University – reaching 24,600 students in the 2023/24 academic year – has clearly exceeded their previous plans, but it seems unlikely that the recently experienced rate of growth could be sustained over the Local Plan period to 2043 and it is possible that there could be some reduction in student numbers if the larger number of students cannot be maintained. However, it is important to recognise that many of the additional students are living in their permanent homes and will therefore already be included within the resident population, and they typically do not create additional student housing need, and they would therefore not reduce the need if the number was to reduce.
- 5.52 The draft LHNA (January 2024) focussed specifically on the growth of the core group of students aged 18-23 given that this is the group that has a specific impact on the demographic analysis, given the large number of inward and outward migrants (Figure 12). Census data identifies that the number of students aged 18-23 resident in the local area increased by around 7,300 over the 20-year period 2001-2021, equivalent to an average of around 370 per year. On this basis, the population projections assumed that this long-term rate of growth would continue year-on-year for this core group of students. However, whilst this may provide a reasonable basis for the plan period as a whole, it will be important for the Council to continue to engage with both universities to understand their individual plans as they continue to develop.
- 5.53 The demographic analysis in Chapter 3 of the LHNA projected a growth of around 6,600 additional full-time students aged 18-23 that would need accommodation in the local area over the 18-year period 2025-2043 (an average of around 370 per year). Based on the average number of residents currently living in all-student households in the local area, the student population growth would equate to around 2,100 households if they were to occupy general needs housing. On that basis, the dwelling-led household projections take account of this projected growth which is counted towards the LHN figure identified by the standard method calculation. Nevertheless, the Council may still want to consider whether it may be appropriate for some of that need to be delivered as Purpose Built Student Accommodation if suitable sites could be identified in the context of competing development needs, with the student bedspaces equivalised to dwellings using the calculation set out in the Housing Delivery Test measurement rule book.¹⁴

¹⁴ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

Housing for People with Health Difficulties and Disabilities

Accessible and Adaptable Housing

- 5.54 The Government’s reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible, and Part M of the Building Regulations for new developments covers the required standards for accessibility, adaptability and wheelchair housing based on three categories.¹⁵
- 5.55 Requirement M4(1) Visitable Dwellings is mandatory for all new homes, whereas the Local Plan will identify the proportion of new homes in the local area that must comply with Requirement M4(2) Accessible and Adaptable Dwellings and Requirement M4(3) Wheelchair User Dwellings. PPG confirms that it will be for the LPA to set out how they demonstrate the need for these higher standards, and provides further details on the evidence that should be used:

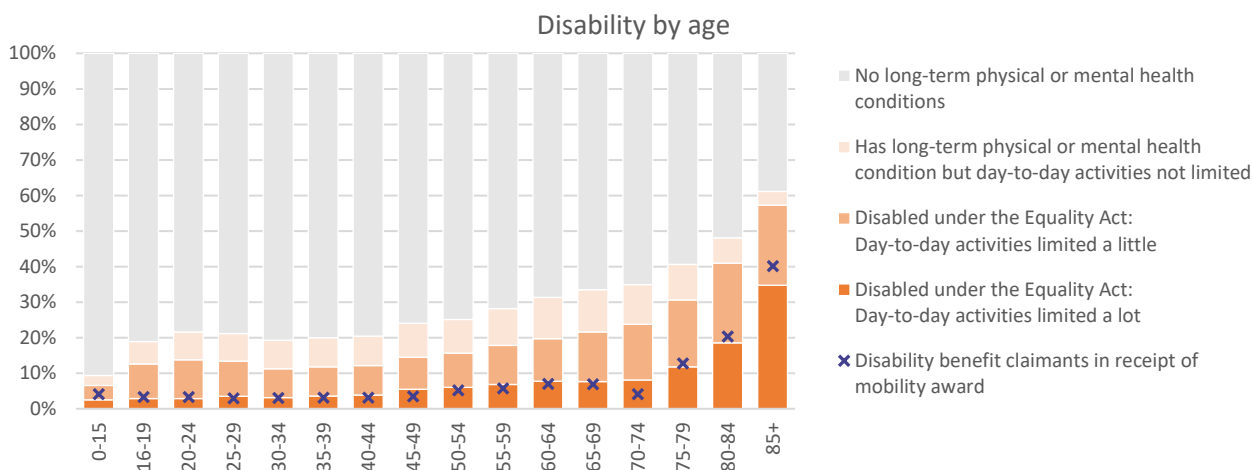
What evidence should local planning authorities use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards?

Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations ... To assist local planning authorities in appraising this data the government has produced a summary data sheet. This sets out in one place useful data and sources of further information which planning authorities can draw from to inform their assessments ...

Planning Practice Guidance, ID 56-007-20150327

- 5.56 The summary data sheet that is referenced is the “Guide to available disability data” (DCLG, March 2015).¹⁶ This provides a general indication of the situation on disabled housing need at that time based on information on the demographics and housing stock across England. It also identifies various local authority data sources including population estimates and projections, Census data on long-term health problems and disabilities, and benefit claimant data. The LHNA has considered population estimates and projections in detail, and Figure 54 presents the disability data for Bath & North East Somerset based on the number of claimants.

Figure 54: Disability status by age, 2021; and disability benefit claimants in receipt of mobility award by age, 2023
(Source: Census data, ONS; Benefit claimant data, DWP)

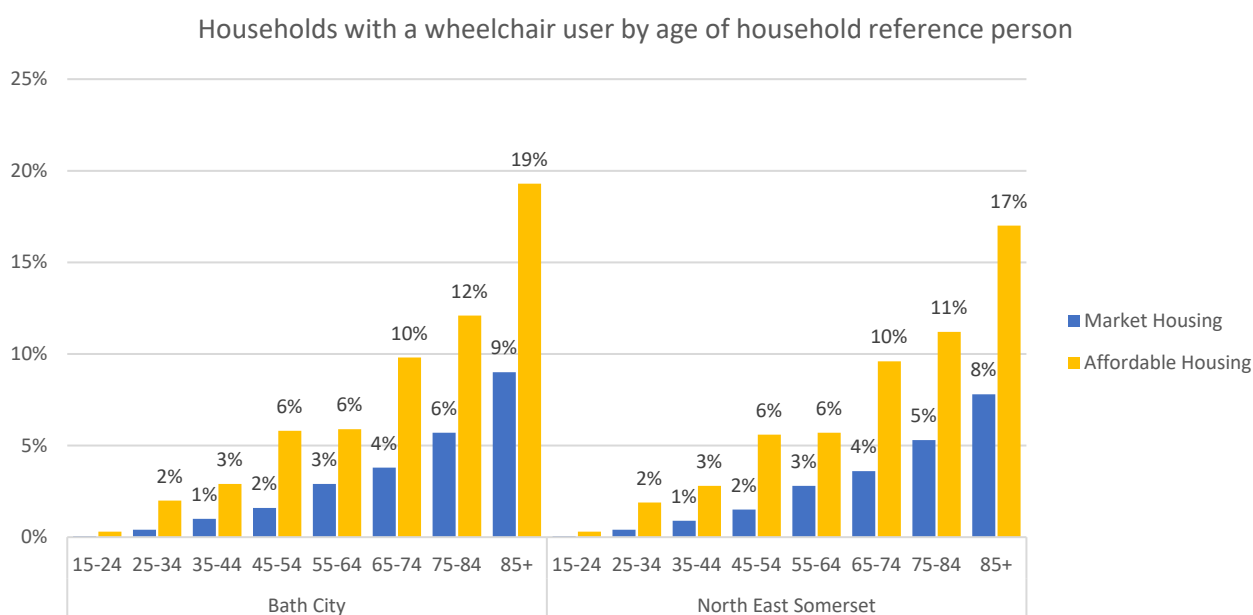


¹⁵ <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>

¹⁶ <https://www.gov.uk/government/publications/building-regulations-guide-to-available-disability-data>

5.57 The DCLG data sheet showed that around one in thirty households in England (3.3%) had at least one wheelchair user, although the rate was notably higher for households living in Affordable Housing (7.1%). English Housing Survey (EHS) data provides further details based on the proportion of households by age, and combining this national data with local data on disability benefit claimants in receipt of mobility award provides the basis for deriving age-specific rates for Bath & North East Somerset (Figure 55).

Figure 55: Households with a wheelchair user in Market Housing and Affordable Housing by age (Source: ORS Model)



5.58 Figure 56 identifies the number of households with a wheelchair user based on applying the derived rates to the dwelling-led household projections. The baseline estimates for 2025 are set out alongside the outputs for 2043 and the associated change from 2025-2043.

Figure 56: Households needing wheelchair housing (Source: ORS Model. Note: Figures may not sum due to rounding)

Households with a wheelchair user	Baseline estimate 2025	Projected total 2043	Change 2025-2043
Market Housing	1,784	2,157	+373
Affordable Housing	912	1,288	+376
TOTAL HOUSEHOLDS	2,696	3,445	+749
Households aged 75 or over	1,113	1,643	+530

5.59 The projected household growth identifies an increase of around 749 additional households with a wheelchair user over the 18-year period, which represents around 3% of the overall household growth identified by the dwelling-led projections (Figure 25, Scenario B). On this basis, it would be appropriate for **a minimum of 3% of all new homes to comply with Requirement M4(3) Wheelchair User Dwellings**.

5.60 The analysis also identifies an increase of 376 households that are likely to have a wheelchair user that need Affordable Housing over the 18-year period 2025-2043, equivalent to an average of 21 per year. On this basis, the need for wheelchair adapted Affordable Housing represents 3% of the overall need (11,587) however it represents 10% of the average number of affordable homes delivered annually over the last 10 years (213 per year). The Council will therefore need to consider what percentage target is justified to ensure that an additional 376 Affordable Homes that comply with Requirement M4(3) can be delivered.

- 5.61 It is also notable that over seven-in-ten (71%) of the projected increase in households with a wheelchair user are aged 75 or over which equates to over 530 households over the 18-year period. This would include some households needing specialist older person housing.
- 5.62 Although not all households aged 75 or over that need wheelchair adapted housing will live in specialist older person housing, it is likely that many households that choose specialist older housing will need wheelchair adapted homes either at the time that they move, or at a later stage due to a deterioration in their health. On this basis it may be appropriate for a higher proportion of specialist older person housing to comply with Requirement M4(3) Wheelchair User Dwellings where it is both viable and practical for this to be achieved.
- 5.63 When considering the proportion of new homes in the local area that should comply with Requirement M4(2) Accessible and Adaptable Dwellings, it is appropriate to note that the Government launched a consultation on raising accessibility standards of new homes in September 2020 and their formal response to the feedback stated that:¹⁷

Government proposes that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes – option 2 in the consultation. M4(1) will apply by exception only, where M4(2) is impractical and unachievable. Subject to a further consultation on the draft technical details, we will implement this change in due course with a change to building regulations.

- 5.64 Despite this commitment, there has been no specific timeframe published for the further work that would be needed to implement this change, and the LPA must still demonstrate the need for the higher standard and identify the proportion of new homes that must comply in the local area through the Local Plan. Nevertheless, the Government proposal to mandate that all new homes comply with Requirement M4(2) provides a relevant context for this analysis.
- 5.65 To establish the need for homes to comply with Requirement M4(2) Accessible and Adaptable Dwellings, Figure 57 identifies the number of households with one or more persons with a long-term physical or mental health condition that limits their day-to-day activities and are disabled under the Equality Act 2010 based on data from the 2021 Census and the dwelling-led household projections. Based on this overall number of households, the number of households that are likely to need adaptations or to move to a more suitable home is estimated using national data from the EHS.

Figure 57: Households with one or more persons that are disabled under the Equality Act 2010 where this affects their housing need, 2025 (Source: ORS Model. Note: Figures may not sum due to rounding)

Households with one or more persons with a long-term physical or mental health condition that limits their day-to-day activities	Number of households
Households with one or more persons that are disabled under the Equality Act 2010	21,391
Less households where their disability does not affect their housing need	15,192
Total households where a disability affects their housing need	6,201
Current home is suitable for their needs	5,098
Current home requires adaptation	566
Need to move to a more suitable home	536

¹⁷ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

5.66 Figure 57 identifies that of the 21,400 households in the area with one or more persons that are disabled, around 6,200 have a disability that affects their housing needs. Most of these households (5,100; 82%) already live in a home that is suitable for their needs. However, the analysis identifies 566 households needing adaptations to their current home and 536 households that need to move to a more suitable home which represent a current unmet need for accessible housing.

5.67 Based on the dwelling-led household projections, we can establish the future need for accessible housing based on the projected household growth and the changing demographics of the area. Figure 58 identifies that there is likely to be around 6,300 households needing accessible housing to be provided by 2043, which represents 25% of the overall household growth. This includes households with a wheelchair user, as those households would evidently be counted as having a health problem that affects their housing need.

Figure 58: Current unmet need and future need from households needing accessible housing in Bath & North East Somerset 2025-2043 (Source: ORS Model. Note: Figures may not sum due to rounding)

	Total households
EXISTING HOUSEHOLDS	
Current unmet need from households needing to move to accessible housing	536
Households likely to develop health difficulties that will affect their housing need within the next 10 years	1,993
Total need from existing households in 2025	2,529
FUTURE POPULATION GROWTH	
Additional households in 2043 likely to experience health difficulties that affect their housing need or likely to develop health difficulties within 10 years	3,794
TOTAL NEED 2025-2043	6,322
Total household growth	25,311
<i>Need for accessible housing as percentage of household growth</i>	<i>25%</i>

5.68 In determining the proportion of new homes in the local area that should comply with the higher standards, it is important to recognise that not all households will want to move to new developments. Some will seek to adapt their current home, and others will move to another dwelling more suitable for adaptation. Nevertheless, EHS data identifies that many existing homes are not suitable for adaptation to meet the standards and others would require major works, so many households needing accessible housing are likely to consider new homes even if that may not be their first choice.

5.69 It is also important to recognise that not every new home that is built to meet the higher accessibility standards will be occupied by households with health difficulties that affect their housing needs – so more homes that meet the higher accessibility standards would need to be provided than the absolute number of households identified above.

5.70 Based on the evidence, it would be appropriate for the Council to seek at least 25% of homes on new development to comply with the optional higher accessibility, adaptability and wheelchair housing standards, including a minimum of 3% of homes that comply with Requirement M4(3) Wheelchair User Dwellings. Nevertheless, higher targets could be considered to ensure that there was sufficient choice and flexibility for households, providing that this was tested in the context of economic viability. As the Government has proposed that **all new homes should comply with Requirement M4(2) Accessible and Adaptable Dwellings** as a minimum whenever it is practical to do so, it would seem reasonable for the Council to also require this, subject to site-specific factors and viability.

Housing for People who Rent

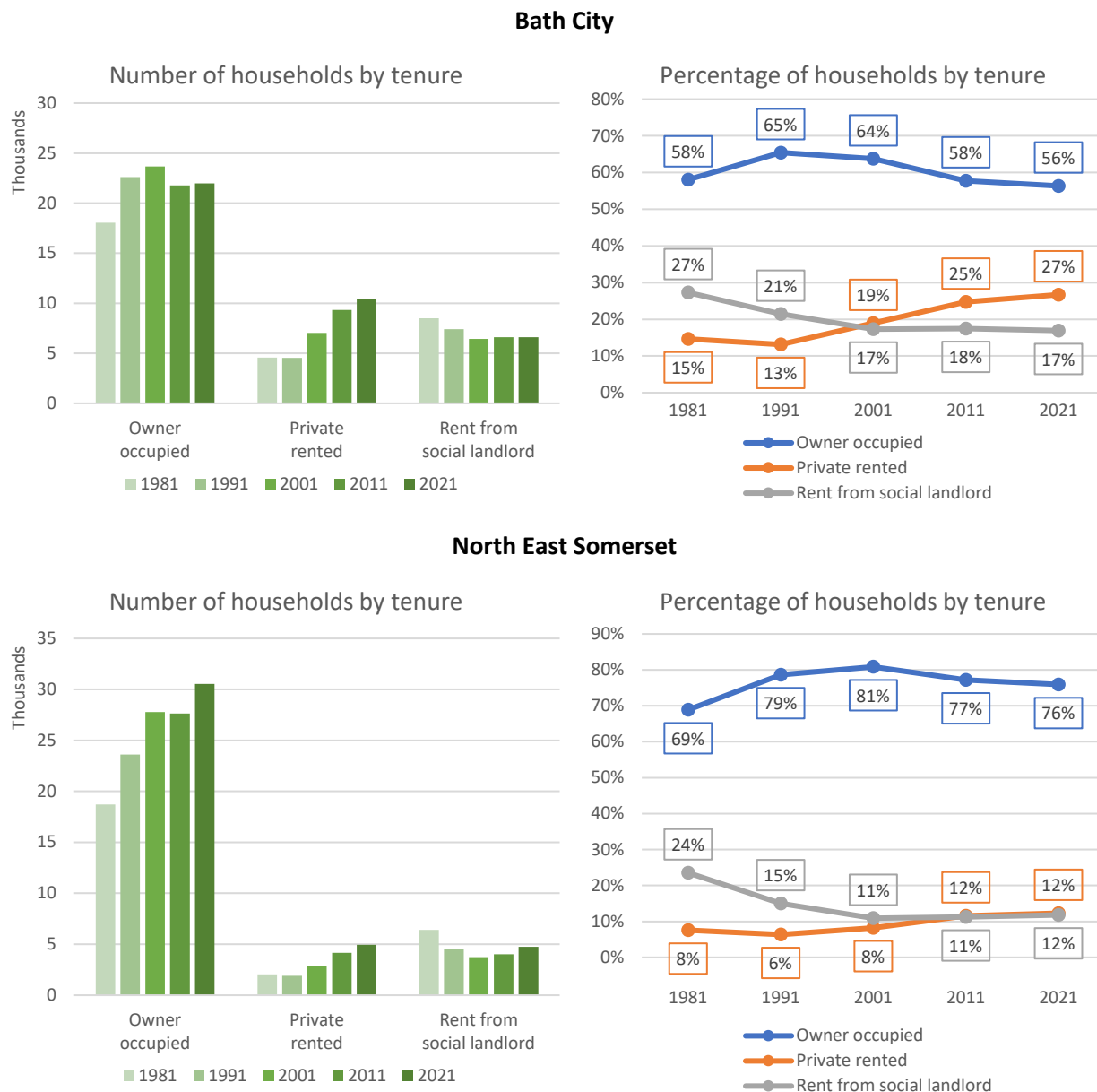
5.71 The PPG recognises the importance of understanding the likely future role of the private rented sector.

Tenure data from the Office for National Statistics can be used to understand the future need for private rented sector housing. However, this will be based on past trends. The level of changes in rents, (known as “market signals”), may reflect the demand in the area for private rented sector housing. Evidence can also be sourced from the English Housing Survey, Office for National Statistics Private Rental Index, the Valuation Office Agency, HomeLet Rental Index and other commercial sources.

Planning Practice Guidance, ID 67-002-20190722

5.72 When considering the local housing market, it is worth noting the historic changes to tenure in the local area, as recorded by past Census data (Figure 59).

Figure 59: Households by tenure 1981-2021 (Source: Census data, ONS)



- 5.73 In 2021, around 52,500 households were owner occupiers (58% in Bath City; 69% in North East Somerset) while 26,700 households rented their homes (42% in Bath City; 31% in North East Somerset). The proportion of owner-occupied households has declined over the past 20 years. Despite this, homeownership remains higher than recorded in 1981, shortly after the introduction of the Housing Act 1980, which established the Right to Buy scheme. This allowed local authority tenants to purchase their homes at discounted prices, leading to a significant increase in owner occupation. By 1991, the percentage of owner occupiers had risen from 58% to 65% in Bath City, and from 69% to 79% in North East Somerset. Over the same period, the proportion of households renting from a social landlord decreased from 27% to 21% and from 24% to 15% respectively in the two areas.
- 5.74 There has been a notable shift in the composition of the rental sector over this time. In 1981, around two thirds of tenants (69%) rented from a social landlord with around one third (31%) renting privately. By 2021, around two fifths rented from a social landlord (11,400; 14%) with three fifths renting privately (15,400; 19%). Many privately renters now depend on Housing Benefit to enable them to afford their housing costs, and the private rented sector is generally not seen as a long-term tenure option for many households (Figure 34).
- 5.75 Figure 60 summarises the Census breakdown of households that rented their home in 2021, alongside the change recorded over the 10-year period since 2011.

Figure 60: Tenure of households that rent, 2011-2021 (Source: Census data, ONS)

	Bath City				North East Somerset			
	2011	2021	Change 2011-21	% change	2011	2021	Change 2011-21	% change
Rented from private landlord	8,215	9,890	1,675	+20%	3,193	3,830	+637	+20%
Other private rented	612	855	243	+40%	427	695	+268	+63%
Living rent free	492	33	-459	-93%	526	24	-502	-95%
Private rent or live rent free	9,319	10,778	1,459	+16%	4,146	4,549	+403	+10%
Rented from social landlord	6,597	6,881	284	+4%	4,017	4,425	+408	+10%
TOTAL	15,916	17,659	1,743	+11%	8,163	8,974	+811	+10%

- 5.76 Across the whole of Bath & North East Somerset, the number of households that rent increased from around 24,100 in 2011 to 26,600 in 2021, representing an additional 2,600 households and an overall increase of 11% over the decade. However, growth was not evenly distributed, with only a 7% increase in households renting from a social landlord (4% in Bath City and 10% in North East Somerset).
- 5.77 The LHNA analysis identified a significant number of households that currently rent privately who aspire to homeownership but cannot afford to buy. This included around 1,200 households assessed as being able to afford Affordable Home Ownership (Figure 37). The analysis identified a need for around 2,400 dwellings for households who want to own who cannot afford to buy over the 18-year period 2025-2043 (Figure 43). The analysis also recognised that there were likely to be additional households that would like to own but do not have sufficient income or savings to access existing Affordable Home Ownership products.
- 5.78 Providing sufficient Affordable Housing to meet this need is likely to reduce the number of households relying on the private rented sector. However, demand for private rented accommodation is likely to continue, particularly among younger households who have limited other options available should they wish to form their own household and live independently. It is therefore unlikely that the overall number of households renting privately will reduce significantly without a substantial shift in long-term trends.

5.79 The Government recognises the importance of the private rented sector, but it is committed to developing a fairer, more stable rental market with greater accountability for landlords. To support this objective, the Renters' Rights Bill was introduced and passed its final parliamentary stage in July 2025. The Bill seeks to strengthen tenant protections and improve housing standards across the sector. Key provisions include:

- » The abolition of Section 21 “no-fault” evictions
- » A move towards periodic tenancies
- » Restrictions on rent increases and a cap of one month’s rent in advance
- » Prohibition of discrimination against tenants in receipt of benefits or those with children
- » An extension of Awaab’s Law, requiring landlords to promptly address serious hazards.

5.80 The Bill also introduces a national Decent Homes Standard, a private rented sector database, and a new ombudsman to support more efficient dispute resolution and ensure stronger enforcement of tenants’ rights. From a local perspective, the introduction of the Renters Reform Bill is viewed as a positive development. Proposed measures such as higher property standards and the creation of a national landlord register are expected to bring benefits.

Houses in Multiple Occupation

5.81 Under the Housing Act 2004, a “House in Multiple Occupation” (HMO) is defined as a dwelling occupied by three or more people from more than one family, where at least one occupant pays rent. This includes, for example, groups of unrelated adults sharing a house.

5.82 HMOs can be categorised based on how properties are subdivided and the extent of shared amenities:

- » **Section 257 buildings:** Converted flats in a building where more than one third of the flats are privately rented on short-term tenancies, and where the building conversion does not comply with 1991 (or later) building regulations
- » **Shared houses:** Properties that might otherwise be family homes but are occupied by three or more unrelated adults living in the dwelling and sharing facilities
- » **Bedsits:** Dwellings converted for multiple occupation where individual rooms typically have separate addresses with exclusive sleeping facilities, but cooking or bathroom facilities are shared with others living in the building.

5.83 The 2021 Census identified 2,085 “Households of Multiple Occupancy” that lived in HMOs in the local area. These were households – defined as groups of individuals who share cooking facilities and a living room, sitting room, or dining area – that lived in dwellings where at least three unrelated tenants rented the accommodation from a private landlord (Figure 61). However, there would be many other households living in HMOs as defined by the Housing Act 2004.

Figure 61: Number of Households of Multiple Occupancy (Source: Census data, ONS)

	Whole house or bungalow	Flat, maisonette or apartment	TOTAL
Small Households of Multiple Occupancy: 3 or 4 unrelated tenants	1,058	261	1,319
Large Households of Multiple Occupancy: 5+ unrelated tenants	701	65	766
TOTAL	1,759	326	2,085

- 5.84 Figure 62 provides a breakdown of all households living in private rented accommodation (including those living rent free) as recorded by the 2021 Census, along with changes for the 10-year period since 2011.

Figure 62: Household composition of households in private rent, 2011-2021 (Source: Census data, ONS)

Household composition	2011	2021	Change 2011-2021	% change 2011-2021
One-person household	3,946	4,420	+474	+12%
Single family household	5,127	6,973	+1,846	+36%
Other household types	3,374	3,972	+598	+18%
TOTAL	12,447	15,365	+2,918	+23%
Other household types with two persons	-	1,285	-	-
Other household types with three of four persons	-	1,746	-	-
Other household types with five or more persons	-	941	-	-

- 5.85 The number of other household types renting privately – those not classified as one-person or single-family households – increased by 18%, to almost 4,000 households in 2021. This included around 1,700 households with three or four persons, and around 900 households with five persons or more, and it is likely that many of these households would live in HMOs. It is also important to note that all self-contained flats, maisonettes or apartments that were part of a converted or shared house would have been counted as separate dwellings by the Census, regardless of whether or not the conversion complied with building regulations. On this basis, there are likely to be many more properties that would be HMOs under the Housing Act 2004 definition.
- 5.86 Although the Census does not provide a definitive total for the number of Houses in Multiple Occupation, the Council is required to submit annual estimates to Government of the number of HMOs in their local area. The Housing Act 2004 also introduced mandatory licensing for all HMOs in England with five or more persons, and the Council has to provide an estimate of the total number of mandatory licensable HMOs and confirm the number of properties that are currently licensed in their area (Figure 63).

Figure 63: Number of HMOs and properties with mandatory HMO licences, 2020/21 to 2023/24 (Source: Local Authority Housing Statistics data, MHCLG)

Category	2020/21	2021/22	2022/23	2023/24
Estimated total number of HMOs	3,556	3,556	3,000	3,967
Estimated number of mandatory licensable HMOs	1,129	1,060	1,125	1,109
Properties with mandatory HMO licenses	1,129	1,110	1,125	1,109

- 5.87 At the time of the 2021 Census, the Council estimated approximately 3,600 properties in the area met the HMO definition under the Housing Act 2004. The most recent estimate (2023/24) suggests that this has since increased to almost 4,000 properties. This represents 4.6% of the total dwelling stock, which provides housing for students and other households seeking HMO accommodation in the local area. Of the HMOs identified, around 1,100 properties are estimated to require a mandatory HMO license, which is consistent with the number of properties currently licensed.

Build to Rent

- 5.88 In seeking to improve housing options within the private rented sector, the Government has encouraged institutional investors to consider Build to Rent developments as part of their portfolios. The NPPF defines

Build to Rent as purpose-built housing that is typically 100% rented, offering longer tenancy agreements (usually three years or more) and professionally management under single ownership and control.

- 5.89 Build to Rent has the potential to offer a more secure and flexible long-term housing option for households currently renting privately. These schemes typically provide longer tenancy agreements, fewer restrictions, and greater flexibility in how homes are occupied and used. To further support growth in this sector, the Government has introduced reforms to pension fund regulations aimed at encouraging longer-term investment, which could include Build to Rent property portfolios.
- 5.90 Savills publish regular reviews of the Build to Rent market.¹⁸ These highlight that the sector now comprises over 132,000 homes, with an additional 51,000 under construction and 110,000 in the planning pipeline, which will bring the total stock to approximately 293,000 homes nationally. Build to Rent accounted for 8% of all new-build completions across England and Wales in 2024, up from 5% in 2019. With increasing institutional investment and reforms promoting longer-term funding strategies, the sector is expected to play an even more significant role in housing delivery across the UK.
- 5.91 The National Planning Policy Framework states that Affordable Housing on Build to Rent schemes should be provided in the form of Affordable Private Rent. In terms of setting affordable rent levels, national policy requires a rent discount of at least 20% for Affordable Private Rent homes relative to local market rents (inclusive of service charges).
- 5.92 The affordability of affordable Build to Rent options will be highly dependent on the rent being discounted. Research by JLL shows that the average Build to Rent property is 9.3% more expensive than median rents.¹⁹ Figure 64 sets out the current median and lower quartile private rents for Bath City and North East Somerset and illustrates likely monthly rents for Build to Rent properties (based on this uplift being applied to median private rents) and Affordable Private Rent being discounted by 20%.

Figure 64: Weekly rent thresholds in Bath City and North East Somerset (Source: Price Index of Private Rents, ONS; JLL.

Note: Highlighted cells indicate that Affordable Build to Rent would be higher than lower quartile private rent)

Monthly Rent	Bath City				North East Somerset			
	1 bed	2 beds	3 beds	4+ beds	1 bed	2 beds	3 beds	4+ beds
Median private rent	£1,246	£1,697	£2,104	£3,254	£813	£1,176	£1,384	£1,747
Build to Rent based on median +9.3%	£1,362	£1,855	£2,300	£3,557	£888	£1,286	£1,513	£1,910
Affordable Private Rent assuming 20% discount	£1,089	£1,484	£1,840	£2,846	£711	£1,029	£1,210	£1,528
Lower quartile private rent	£1,101	£1,351	£1,742	£2,708	£718	£937	£1,146	£1,454

- 5.93 These illustrative rents identify that the likely monthly rental costs of a 1-bedroom affordable Build to Rent property would only be marginally less than entry level market housing (based on lower quartile private rent) and the rental costs for properties with two or more bedrooms would be more than entry level market housing. On this basis, whilst Build to Rent could provide a useful mechanism for delivering additional housing and improving the quality of the private rented sector, it seems likely that rents for Affordable Private Rent would need to be discounted by more than 20% to ensure that properties were affordable for households unable to afford entry level market housing.

¹⁸ https://www.savills.co.uk/research_articles/229130/376156-0

¹⁹ <https://www.jll.co.uk/content/dam/jll-com/documents/pdf/research/emea/uk/jll-residential-insight-build-to-rent.pdf>

Housing for Other Groups

Housing for Essential Local Workers

- 5.94 Annex 2 of the NPPF defines public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers – as essential local workers.
- 5.95 Essential local worker households that cannot afford market rents and those that aspire to homeownership but cannot afford to buy will already be counted within the overall assessment of affordable housing need, so their needs will not add to the previously identified need for affordable housing. However, it will be important for the Council to ensure that housing allocation policies consider their needs specifically, and it may be appropriate to consider if any specific affordable homes should be set aside for essential local workers that are unable to afford suitable housing.

Housing for People Wishing to Build their Own Homes

- 5.96 Self-build and custom housebuilding currently represents less than 10% of housing completions in the UK, which compares to rates of around 40% in France and 70 to 80% elsewhere in Europe.
- 5.97 Given this context, the Government introduced the Self-Build and Custom Housebuilding Act 2015²⁰ and subsequent amendments in the Housing and Planning Act 2016²¹ which place a duty on LPAs to:
- » Keep a register (and publicise this) of eligible prospective ‘custom’ and self-build individuals, community groups and developers
 - » Provide sufficient serviced plots with planning permission for self-build or custom housebuilding to meet the need on the register, and offer these plots to those on the register at market value
 - » Allow developers working with housing associations to include self-build and custom housebuilding as part of their affordable housing contribution.
- 5.98 PPG for self-build and custom housebuilding was published in 2021.²² This updated the definition of self-build and custom housebuilding, and set out how the need should be assessed and met.

Self-build and custom housebuilding covers a wide spectrum, from projects where individuals are involved in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built ready for occupation (‘turnkey’) ...

In considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout. Off-plan housing, homes purchased at the plan stage prior to construction and without input into the design and layout from the buyer, are not considered to meet the definition of self-build and custom housing.

Planning Practice Guidance, ID: 57-016-20210208

²⁰ <http://services.parliament.uk/bills/2014-15/selfbuildandcustomhousebuilding.html>

²¹ <http://services.parliament.uk/bills/2015-16/housingandplanning.html>

²² [Self-build and custom housebuilding - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/self-build-and-custom-housebuilding)

5.99 LPAs are expected to grant sufficient permissions to meet the numbers on their register within three years, with demand measured across base periods that run from 31 October until 30 October the following year. However, whilst authorities must meet the demand for plots identified by their register, they are also expected to consider other data sources.

Local planning authorities should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources (as outlined in the housing and economic development needs guidance), to understand and consider future need for this type of housing in their area. Secondary sources can include data from building plot search websites, enquiries for building plots recorded by local estate agents and surveys of local residents. Demand assessment tools can also be utilised.

Planning Practice Guidance, ID: 57-011-20210208

5.100 MHCLG produced an action plan in 2021 which aimed to further support development of the self-build and custom housebuilding sector.²³ The Government at that time also commissioned an independent review into the scaling up of self-build and custom housebuilding,²⁴ which they responded to in June 2022.²⁵ The review focused primarily on supply side factors limiting the delivery of self-build and custom housebuilding, and produced six key recommendations which were broadly supported by the Government:

- » Greater role for Homes England
- » Raise awareness of the Right-to-Build
- » Support community-led housing, diversity of supply and levelling-up
- » Promote greener homes and more use of advanced manufacturing
- » Support custom and self-build housebuilding through the planning reforms
- » Iron out issues around tax which act as disincentives to build.

5.101 More recently, the Levelling Up and Regeneration Act 2023 has introduced two further provisions relating to self-build and custom housebuilding:

- » The Act imposes a new duty on councils to include pre-existing unmet demand for self-build and custom build housing when calculating their current level of demand
- » The demand for self-build and custom housebuilding in any “12-month base period should be treated as including any demand from an earlier 12-month base period which has not been met within the time period allowed for complying with the duty to meet that demand”.

5.102 Bath & North East Somerset Council introduced a Self-Build and Custom Housebuilding Register in April 2016, and a local connection test was introduced in 2017. The adopted Local Plan does not include a specific policy relating to self-build and custom housebuilding, though Policy H4 generally encourages this type of delivery. Figure 65 provides a summary of all applications received and planning permissions granted since the introduction of the register.

²³ <https://www.gov.uk/government/publications/self-and-custom-build-action-plan/self-and-custom-build-action-plan>

²⁴ <https://www.gov.uk/government/publications/independent-review-into-scaling-up-self-build-and-custom-housebuilding-report>

²⁵ <https://www.gov.uk/government/publications/government-response-to-the-independent-review-into-scaling-up-self-build-and-custom-housebuilding>

Figure 65: Self-build and Custom Housebuilding Register (Source: Right to build registers monitoring data, MHCLG)

Base period	Entries added during period	Part 1: with local connection	Part 2: with no local connection	Planning permissions granted
Up to 30 October 2016	459	-	-	-
31 October 2016 to 30 October 2017	267	-	-	65
31 October 2017 to 30 October 2018	137	-	-	103
31 October 2018 to 30 October 2019	126	41	85	199
31 October 2019 to 30 October 2020	65	32	33	32
31 October 2020 to 30 October 2021	89	54	35	46
31 October 2021 to 30 October 2022	37	21	16	34
31 October 2022 to 30 October 2023	34	23	11	35
31 October 2023 to 30 October 2024	29	22	7	41
TOTAL	1,243	862	381	555

- 5.103 While the self-build and custom housebuilding register may not capture all demand for this type of housing in the local area, the alternative sources suggested by PPG – such as the Need a Plot website – now rely on information from local authority registers. As a result, the housing register and actual plot uptake provide the only available sources of data. The Council should therefore focus on the demand identified by the register and address any supply constraints in line with the focus of national policy. It will also be important for the new Local Plan to include appropriate policies to ensure compliance with national policy and to help enable the Council to meet the demand identified by the register.
- 5.104 The number of applicants added to the register has varied from year-to-year, but the number has reduced since the register was first introduced. More detailed information is now published to separately identify applicants to Part 1 of the register (those with a local connection) and the applicants to Part 2. Over the period 2018/19 to 2023/24, the number of entries added to Part 1 of the register has averaged 32 applicants per year and the number added to Part 2 has averaged 31 per year.
- 5.105 Considering those applicants with a local connection, based on the average number of entries to Part 1 being sustained in future, the overall need is likely to represent around 580 additional households over the 18-year Local Plan period 2025-2043. Taking account of the difference between the overall number of entries added to date (862) and the planning permissions granted (555) suggests that there would be an additional 307 households at the start of the Plan period in 2025, thereby yielding an overall total of around 900 households needing serviced plots for self-build and custom housebuilding.
- 5.106 This represents around 4% of the overall household growth identified by the dwelling-led projections (Figure 25, Scenario B). On this basis, the Council will need to consider introducing a policy requirement for a proportion of plots on larger sites to be made available to deliver serviced plots for self-build and custom housebuilding. It might also be appropriate for the Council to explore possible options for increasing demand that could help to justify a higher percentage target.
- 5.107 Experience elsewhere suggests that the self-build and custom housebuilding sector works relatively well for households who are seeking to build bespoke properties on single plot sites and as part of multi-plot sites. However, such households tend to be relatively affluent and can afford to build homes to their own design. There is less evidence that needs of those with lower budgets are being met, as the price of plots remains high which is arguably a reflection of the market for self and custom housebuilding being supply constrained and that suitable plots attract a premium which is offsetting any potential discounts from CIL exemptions.

- 5.108 The Government's new Help-to-Build scheme may help to make self-build and custom housebuilding more accessible and affordable. For households with lower budgets, some will want to be heavily involved in the building of their final property (and possibly undertaking some of the work themselves to save on costs) whereas there will be others who would only want to customise the interior of their new home within a standard exterior. The Council could work proactively with both groups.
- 5.109 The Council could seek to work with developers and Registered Providers to assess the potential demand for Affordable Home Ownership being delivered through self-build and custom housebuilding. This could include providing serviced plots or partially completed dwellings that are sold at cost (in lieu of providing other Affordable Housing) which could enable households to deliver their own Affordable Home Ownership homes.
- 5.110 There is also potential to encourage builders to deliver market homes that is either customised at the outset, or which could be built with a standard exterior but with an interior that the final occupant could customise. Both of these approaches can be considered to fit within the definition of custom-built housing; and could both be encouraged with the provision of small and larger sites.

6. Future Mix of Housing

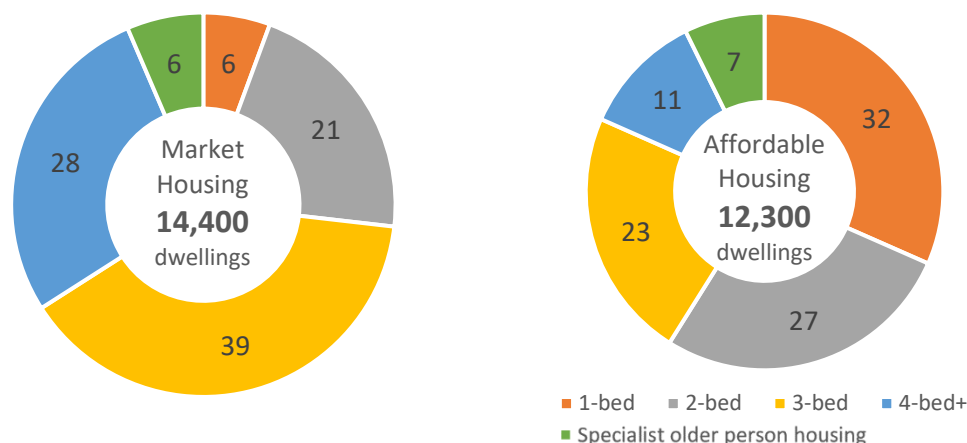
- 6.1 Figure 66 sets out the overall housing mix identified by the LHNA based on the housing need identified by the standard method calculation.
- 6.2 This provides a breakdown of the size, type and tenure of housing needed for the whole of Bath & North East Somerset local planning authority area over the 18-year period 2025-2043, based on the overall identified need for Market Housing and Affordable Housing. The outputs identify the mix of general needs housing based on the number of bedrooms and the specialist older person housing need based on the type of housing.

Figure 66: Overall Market Housing and Affordable Housing need by property type and number of bedrooms 2025-2043
(Source: ORS Model. Note: Figures may not sum due to rounding)

Local Housing Need 2025-2043		Market Housing	Affordable Housing	TOTAL
General Needs Housing	1 bedroom	812	3,886	4,698
	2 bedrooms	3,060	3,360	6,421
	3 bedrooms	5,650	2,792	8,442
	4 bedrooms	3,026	1,016	4,042
	5+ bedrooms	956	347	1,303
Specialist Older Person Housing	Housing with Care	194	208	403
	Housing with Support	738	688	1,425
Dwellings in Use Class C3		14,437	12,297	26,734
Bedspaces in Use Class C2 (equivalised to dwellings)				284
TOTAL HOUSING NEED				27,018

- 6.3 The LHNA has identified a need for 14,400 homes for market sale or rent (54% of the total dwellings) and 12,300 affordable homes (46%). This includes an identified need for around 1,800 self-contained specialist older person housing units, comprising both Housing with Care and Housing with Support. There is also an identified need for additional bedspaces in purpose-built student accommodation and in care homes.
- 6.4 Figure 67 summarises the percentage mix of the identified need for Market Housing and Affordable Housing.

Figure 67: Percentage mix of Market Housing and Affordable Housing need by property type and size (Source: ORS Model)



Overall Housing Need

Market Housing

- 6.5 The need for Market Housing includes around 900 self-contained specialist older person housing units, comprising both Housing with Care and Housing with Support, which represents around 6% of the total homes for market sale or rent.
- 6.6 The LHNA analysis also identified that two thirds (67%) of the homes for market sale or rent would need to be family homes with three or more bedrooms. However, the analysis identified that many older couples without children and one-person households will continue to live in family homes after their adult children have left to live independently. Although many older households do not want to leave their family home and are unlikely to move, some would move within the general housing stock if there were suitable homes available that better met their needs. On that basis, there could be opportunity for existing family homes to be vacated (reducing the need for additional family housing to be provided) if the right type of general needs housing could be provided for older households.

Affordable Housing

- 6.7 The need for Affordable Housing includes need for 9,900 dwellings that will need to be provided as rented Affordable Housing, comprising 2,300 dwellings (23%) for households that could afford Affordable Rent, and 7,600 dwellings (77%) provided as Social Rent for households that could not afford Affordable Rent. The remaining 2,400 dwellings identified by the analysis would be for households that aspire to own but cannot afford to buy, where they have been assessed as having sufficient income and savings to afford Affordable Home Ownership. Within the need for rented affordable homes, there is an identified need for around 900 specialist older person housing units, comprising Housing with Care and Housing with Support.
- 6.8 As previously noted, when considering the future delivery of affordable homes for rent, this analysis does not necessarily mean that 23% of the housing on each site should be Affordable Rent with the remainder provided as Social Rent. Instead, the Council should aim to achieve this balance overall across all of the rented Affordable Housing that is delivered. It will therefore be important for the Council to take account of all of the available evidence when determining the appropriate mix of housing to be provided on individual sites, in order to ensure that the overall balance is achieved.

Accessible and Adaptable Housing

- 6.9 The LHNA analysis also concluded that at least 25% of homes on new developments should comply with the optional higher accessibility, adaptability and wheelchair housing standards:
- » 3% of homes should comply with Requirement M4(3) Wheelchair User Dwellings, and
 - » A minimum of 22% should comply with Requirement M4(2) Accessible and Adaptable Dwellings.
- 6.10 The analysis also identified that 3% of all new Affordable Housing should comply with Requirement M4(3) and concluded that it would be appropriate for all specialist older person housing to comply with Requirement M4(3) where it is practical for this to be achieved. The Council could also consider a higher target for Requirement M4(2) Accessible and Adaptable Dwellings to ensure that there was sufficient choice and flexibility for households, although this would need to be tested in the context of economic viability.

Housing Need in Bath City

- 6.11 Figure 68 provides a breakdown of the overall housing need identified for Bath City: a total of 7,429 dwellings over the 18-year period 2025-2043.
- 6.12 For Bath City, the analysis has assumed that past trends in population growth will be sustained in future, which includes a continued growth of the student population. The analysis has also assumed that household formation rates will increase, so that the potential households identified (i.e. people living in the local area but as part of another household, and who want to live independently) are able to form separate households.
- 6.13 The need for Affordable Housing is based on the identified current and future need being met within the area, and the affordability analysis is based on house prices and rents in Bath City. On this basis, the Affordable Housing need represents two thirds (67%) of all dwellings.

Figure 68: Overall Market Housing and Affordable Housing need by property type, tenure and number of bedrooms, Bath City 2025-2043 (Source: ORS Model. Note: Figures may not sum due to rounding)

Local Housing Need 2025-2043	Market Housing	Affordable Housing				OVERALL TOTAL
		Social Rent	Affordable Rent	AHO	Total	
General Needs Housing						
1 bedroom	-35	1,314	114	596	2,024	1,989
2 bedrooms	504	568	218	506	1,293	1,797
3 bedrooms	864	414	179	242	835	1,698
4 bedrooms	457	114	44	141	299	756
5+ bedrooms	329	59	23	73	156	485
Specialist Older Person Housing						
Housing with Care	64	44	-	-	44	108
Housing with Support	267	218	-	-	218	485
Dwellings in Use Class C3	2,451	2,731	579	1,558	4,868	7,319
Bedspaces in Use Class C2 (equivalised to dwellings)						110
TOTAL HOUSING NEED						7,429
General Needs Housing						
1 bedroom	-0.5%	18.0%	1.6%	8.1%	27.7%	27.2%
2 bedrooms	6.9%	7.8%	3.0%	6.9%	17.7%	24.6%
3 bedrooms	11.8%	5.7%	2.4%	3.3%	11.4%	23.2%
4 bedrooms	6.3%	1.6%	0.6%	1.9%	4.1%	10.3%
5+ bedrooms	4.5%	0.8%	0.3%	1.0%	2.1%	6.6%
Specialist Older Person Housing						
Housing with Care	0.9%	0.6%	-	-	0.6%	1.5%
Housing with Support	3.6%	3.0%	-	-	3.0%	6.6%
ALL DWELLINGS	33.5%	37.3%	7.9%	21.3%	66.5%	100.0%
Affordable Housing Need	-	56.1%	11.9%	32.0%	100.0%	-

Housing Need in North East Somerset

- 6.14 Figure 69 provides a breakdown of the overall housing need identified for North East Somerset: a total of 19,589 dwellings over the 18-year period 2025-2043.
- 6.15 For North East Somerset, the analysis has assumed that future population growth will need to be higher than identified by past trends in order to ensure that the population and household growth across the whole of Bath & North East Somerset aligns with the number of dwellings identified by the LHN figure. Additional inward migrants are therefore assumed to move into the sub-area. The analysis also assumes that household formation rates will increase, so that the potential households identified can form separate households.
- 6.16 The need for Affordable Housing is based on the identified current and future need being met within the area, and the affordability analysis is based on house prices and rents in North East Somerset. On this basis, the Affordable Housing need represents around two fifths (38%) of all dwellings.

Figure 69: Overall Market Housing and Affordable Housing need by property type, tenure and number of bedrooms, North East Somerset 2025-2043 (Source: ORS Model. Note: Figures may not sum due to rounding)

Local Housing Need 2025-2043	Market Housing	Affordable Housing				OVERALL TOTAL
		Social Rent	Affordable Rent	AHO	Total	
General Needs Housing						
1 bedroom	848	1,402	296	164	1,861	2,709
2 bedrooms	2,556	1,264	562	242	2,068	4,624
3 bedrooms	4,787	1,089	597	271	1,957	6,744
4 bedrooms	2,568	397	211	110	718	3,286
5+ bedrooms	627	106	56	29	191	818
Specialist Older Person Housing						
Housing with Care	130	164	-	-	164	295
Housing with Support	471	469	-	-	469	940
Dwellings in Use Class C3	11,986	4,892	1,722	815	7,429	19,415
Bedspaces in Use Class C2 (equivalised to dwellings)						174
TOTAL HOUSING NEED						19,589
General Needs Housing						
1 bedroom	4.4%	7.2%	1.5%	0.8%	9.6%	14.0%
2 bedrooms	13.2%	6.5%	2.9%	1.2%	10.6%	23.8%
3 bedrooms	24.7%	5.6%	3.1%	1.4%	10.1%	34.7%
4 bedrooms	13.2%	2.0%	1.1%	0.6%	3.7%	16.9%
5+ bedrooms	3.2%	0.5%	0.3%	0.2%	1.0%	4.2%
Specialist Older Person Housing						
Housing with Care	0.7%	0.8%	-	-	0.8%	1.5%
Housing with Support	2.4%	2.4%	-	-	2.4%	4.8%
ALL DWELLINGS	61.7%	25.2%	8.9%	4.2%	38.3%	100.0%
Affordable Housing Need	-	65.8%	23.2%	11.0%	100.0%	-

Final Conclusions

- 6.17 Based on the LHNA evidence, the Council will determine the appropriate housing requirement to be planned for over the Local Plan period. The housing requirement may be higher than the identified housing need to reflect local growth aspirations, which would not normally have to be justified at examination. Alternatively, the housing requirement may be lower than the identified need; but only where that can be justified by evidence on land availability, development constraints and any other relevant matters. Otherwise, the housing requirement should plan to meet the identified housing need as a minimum.
- 6.18 Whilst the LHNA forms an important part of the wider evidence base to inform the development of more detailed housing and planning policies, it is important to recognise that these findings should not be considered in isolation as it will form part of the wider evidence base.
- 6.19 The LHNA does not seek to determine rigid policy conclusions but instead sets out the likely implications of different options that may be available for policy makers to consider, together with recommendations where appropriate. On this basis, the LHNA will provide a key component of the evidence required to develop and support a sound policy framework, but the Council will need to determine individual policies based on relevant policy decisions.

Glossary

There are a number of terms and acronyms used throughout the Local Housing Need Assessment (LHNA) which have specific meanings based on the following definitions.

Where appropriate these definitions reflect those in the National Planning Policy Framework (NPPF),²⁶ Planning Practice Guidance (PPG),²⁷ and the Office for National Statistics (ONS) Census 2021 dictionary.²⁸

Key Terms

Local Housing Need Assessment (LHNA)

An assessment to determine *housing need* and assess the size, type and tenure of housing needed for different groups in the community including those who need *Affordable Housing* (including *Social Rent*); families with children; looked after children; *older people* (including those who need retirement housing, housing-with-care and care homes); students; people with disabilities; service families; people who rent their homes and people wishing to commission or build their own homes.

National Planning Policy Framework (NPPF)

The *National Planning Policy Framework (NPPF)* sets out the Government's planning policies for England and how these are expected to be applied.

Planning Practice Guidance (PPG)

National Planning Practice Guidance (PPG) is an online resource that provides advice and guidance on various aspects of the planning system. It is intended to be read alongside the *NPPF* and helps both plan makers and decision-makers understand and apply national planning policies. The *PPG* is a material consideration in planning decisions, meaning it must be taken into account when assessing planning applications.

Local Planning Authority (LPA)

The public authority whose duty it is to carry out specific planning functions for a particular *local area*.

Local area

Local area refers to the specific geographic area covered by a *local planning authority*.

Local plan

A plan for the future development of a *local area*, drawn up by the *local planning authority* in consultation with the community, under the Town and Country Planning (Local Planning) (England) Regulations 2012.

Housing need

An unconstrained assessment of the minimum number of homes needed in a *local area*. Assessing *housing need* is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability and establishing a *housing requirement* figure.

Local Housing Need (LHN) figure

The number of homes identified as being needed through the application of the *standard method* set out in national *planning practice guidance*.

Standard method

The *standard method* for assessing *local housing need* is a formula used to determine the minimum number of homes a *local planning authority* in England should plan for in their *local area*. It uses local *dwelling stock* to establish a baseline figure which is then adjusted upwards to reflect local affordability pressures.

Housing requirement

The minimum number of homes that a *local plan* seeks to provide during the plan period. In addition to the *local housing need figure*, any needs that cannot be met within neighbouring areas should also be taken into account.

The planned *housing requirement* may be higher than the identified *housing need* to reflect growth aspirations, which should not normally have to be thoroughly justified at examination.

The planned *housing requirement* may be lower than the identified need where that can be justified by evidence on land availability, development constraints and any other relevant matters.

Where the *local plan* cannot provide for the identified *housing need* this should be discussed with neighbouring *local planning authorities* under the Duty to Cooperate.

²⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

²⁷ <https://www.gov.uk/government/collections/planning-practice-guidance>

²⁸ <https://www.ons.gov.uk/census/census2021dictionary>

Types of Housing and Housing Schemes

Dwelling

A unit of accommodation, for example a house or flat, that will either be the *usual residence* of a *household* or an *unoccupied dwelling* without any *usual residents*.

Unoccupied dwelling

A *dwelling* that has no *usual residents* living in the accommodation, for example empty homes for sale.

Unoccupied dwellings may be used by short-term residents or visitors, for example holiday homes, or as a second home for a *household* where the *dwelling* not their *usual residence*.

Communal establishment

A managed *communal establishment* is a place that provides managed full-time or part-time supervision of residential accommodation.

Examples include:

- university halls of residence and boarding schools
- care homes, hospitals, hospices and maternity units
- hotels, guest houses, hostels and bed and breakfasts, all with residential accommodation for seven or more guests
- prisons and other secure facilities
- Single Living Accommodation (SLA) in military bases
- staff accommodation
- religious establishments.

It does not include sheltered accommodation, serviced apartments, nurses' accommodation, and houses rented to students by private landlords. These are *dwellings* that would be occupied by *households*.

Use Class C2 (residential institution)

A building used as a *communal establishment* providing residential accommodation and care.

Use Class C3 (dwellinghouse)

A building used as a *dwelling* for:

- a *family* or individual living as a single *household*, or
- up to six unrelated people living together as a single *household*, with or without care.

The accommodation must be self-contained, with exclusive use of living, sleeping, cooking and bathroom facilities that are not shared with another household.

General needs housing

Housing to meet the needs of the general population.

Supported housing

Housing with support services for people who need help to live independently, typically vulnerable groups such as people with disabilities, mental health needs, or those at risk of homelessness. Support does not always involve personal care, and it may include help with managing health or daily living.

Specialist housing for older people

There are different types of *specialist housing* designed to meet the diverse needs of *older people*:

- age-restricted general market housing
- housing with support, such as retirement living or sheltered housing, with some support provided to help residents live independently
- housing with care, such as extra care housing, with access to support services and staff typically providing 24-hour onsite care.

These are *dwellings* in *Use Class C3*, as they have facilities that are not shared with other households, although community facilities may also be available. *Specialist housing* can also include bedspaces in *communal establishments* in *Use Class C2*, such as residential care homes and nursing homes.

Any single development may contain a range of different types of *specialist housing for older people*.

Market Housing

Housing for sale or rent, for those who can afford to rent or buy housing in the *local area*.

Affordable Housing

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for *essential local workers*); and which complies with one or more of the definitions in Annex 2 of the *NPPF*.

Social Rent

Social Rent housing meets the following conditions:

- the rent is set in accordance with the Government's rent policy for *Social Rent*
- the landlord is a registered provider
- provisions are included for the housing to remain at an affordable price for future eligible *households*, or for the subsidy to be recycled for alternative *Affordable Housing* provision.

Private Sector Leased (PSL) housing

A scheme where local authorities lease and manage privately owned properties to provide housing for *households* that are often homeless and in need of temporary accommodation.

Build to Rent

Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more and will typically be professionally managed stock in single ownership and management control.

Rural exception sites

Small sites used for *Affordable Housing* in perpetuity where sites would not normally be used for housing. *Rural exception sites* seek to address the needs of the local community by accommodating *households* who are either current residents or have an existing family or employment connection.

A proportion of *Market Housing* may be allowed on the site at the *local planning authority's* discretion, for example where essential to enable the delivery of *Affordable Housing* without grant funding.

Self-build and custom-build housing

Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either *Market Housing* or *Affordable Housing*. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Census and Demography

Usual resident

A person who has stayed or intends to stay in the *local area* for a period of 12 months or more, or has a *usual residence* in the *local area* and intends to be outside the *local area* for less than 12 months.

Usual residence

The primary address of a *usual resident*.

Household

A *household* is defined as:

- one person living alone, or
- a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room or sitting room, or dining area.

This includes:

- all sheltered accommodation units in an establishment (irrespective of whether there are other communal facilities), and
- all people living in caravans on any type of site that is their usual residence, and who has no other usual residence elsewhere in the UK.

A *household* must contain at least one *usual resident* whose *usual residence* is the *household* address.

A group of short-term residents living together is not classified as a *household*, and neither is a group of people at an address where only visitors are staying.

All *households* have one *Household Reference Person (HRP)*.

Household Reference Person (HRP)

A *Household Reference Person* serves as a reference point, mainly based on economic activity and age, to characterise a whole *household*. The person is not necessarily the member of the *household* in whose name the accommodation is owned or rented.

Dependent child

A *dependent child* is a person aged 0 to 15 years or a person aged 16 to 18 years who is in full-time education and lives in a *family* with their parent, parents, grandparent or grandparents. It does not include any person aged 16 to 18 years who has a spouse, partner or child living in the *household*.

Non-dependent child

A *non-dependent child* is a person living with their parent(s) and who is either aged 19 years or over and has no spouse, partner or child living in the *household*, or aged 16 to 18 years and who is not in full-time education and has no spouse, partner or child living in the *household*.

Non-dependent children are sometimes referred to as "adult children".

Older people

People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of *specialist housing for older people* including those with support or care needs.

Essential local workers

Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.

Family

A group of people who are any of the following:

- married, civil partnered or cohabiting couple with or without children (the children do not need to belong to both members of the couple)
- a lone parent with at least one child who lives in the same *household*
- a married, civil partnered or cohabiting couple with grandchildren but where the parents of those grandchildren are not present
- a single or couple grandparent with grandchildren but where the parents of those grandchildren are not present.

Children can be *dependent* or *non-dependent* and a family can have a mixture of *dependent* and *non-dependent children*.

All families have one *Family Reference Person (FRP)*.

Family Reference Person (FRP)

A *Family Reference Person* is identified by criteria based on the family make up.

In a lone parent family, the *FRP* is the lone parent.

In a couple family, the *FRP* is chosen from the two people in the couple based on their economic activity (in the priority order: full-time job, part-time job, unemployed, retired, other). If both people have the same economic activity, the *FRP* is identified as the elder of the two or, if they are the same age, the first member of the couple on the Census form.

Multi-generational family household

A *household* where people from across more than two generations of the same extended family live together. This includes *households* with grandparents and grandchildren, whether or not the intervening generation also live in the *household*.

Multi-family household

A *household* that consists of two or more *families*.

The *families* can be:

- unrelated (for example, two unrelated couples sharing a house)
- related and *multi-generational* (for example, cohabiting couple plus children and elderly parents, or married couple plus their teenage daughter and her child)
- related but not *multi-generational* (for example, cohabiting couple plus son and girlfriend, or two brothers and their partners sharing a house).

Concealed family

Concealed families are couple or lone parent *families* living in *multi-family households*, where the *FRP* is not the *Household Reference Person (HRP)*.

As an example:

George and Amy live at the same address as their daughter, Emily, and her husband and daughter. Because Emily is not a *dependent child* and has her own *family*, the *household* contains two *families*.

Family one are husband George and wife Amy.

George is the *Family Reference Person (FRP)*.

Family two are daughter Emily, husband Simon and their daughter Eve. Emily is the *FRP*.

As there is more than one *family* in the *household*, the *FRPs* are prioritised to decide who is the *HRP*.

In this *household*, George is the *HRP*. This means that Emily's *family* is a *concealed family*. Their *HRP* is George, and they will be included as part of his *household* in relevant outputs.

Potential household

Potential households are *concealed families* or *non-dependent children* or other individuals living as part of an existing *household* that want to live independently and form a separate *household* now.

Summary of Acronyms

B&NES	Bath & North East Somerset
DCLG	Department for Communities and Local Government (2006-2018) https://discovery.nationalarchives.gov.uk/details/c/F268656
DPA	Dwellings Per Annum
DWP	Department for Work and Pensions https://www.gov.uk/government/organisations/department-for-work-pensions
EHS	English Housing Survey https://www.gov.uk/government/collections/english-housing-survey
FRP	Family Reference Person
HDT	Housing Delivery Test https://www.gov.uk/government/collections/housing-delivery-test
HEI	Higher Education Institution
HESA	Higher Education Statistics Agency https://www.hesa.ac.uk/
HMO	House in Multiple Occupation
HRP	Household Reference Person
HRR	Household Representative Rate
LA	Local Authority
LAHS	Local Authority Housing Statistics https://www.gov.uk/government/collections/local-authority-housing-data
LHA	Local Housing Allowance https://www.gov.uk/guidance/local-housing-allowance
LHN	Local Housing Need
LHNA	Local Housing Needs Assessment
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government https://www.gov.uk/government/organisations/ministry-of-housing-communities-local-government
MYE	Mid-Year Estimates https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates
NHS	National Health Service https://www.nhs.uk/
NPPF	National Planning Policy Framework https://www.gov.uk/government/publications/national-planning-policy-framework--2
ONS	Office for National Statistics https://www.ons.gov.uk/
ORS	Opinion Research Services https://www.ors.org.uk/
PPG	Planning Practice Guidance https://www.gov.uk/government/collections/planning-practice-guidance
PRS	Private Rented Sector
PSL	Private Sector Leased
RSL	Registered Social Landlord

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