

Affordable Housing Proof of Evidence of Annie Gingell BSc (Hons) MSc MRTPI

Bricket Wood Sports and Country Club, Paintball Site and
Bricket Lodge, Lye Lane, Bricket Wood, Hertfordshire
AL2 3TF

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Outline application (access sought) - Demolition of existing buildings and construction of up to 115 dwellings and creation of new access

Bricket Wood Sports and Country Club, Paintball Site and Bricket Lodge,
Lye Lane, Bricket Wood, Hertfordshire AL2 3TF

JK Rudkin Builders Limited

May 2024

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Appendices

Appendix AG1	Freedom of Information Response (11 May 2023 and 18 April 2024)
Appendix AG2	Extracts from Planning Practice Guidance (March 2014, ongoing updates)
Appendix AG3	Summary of Corporate Documents
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Appendix AG5	Affordable Housing Future Supply
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Appendix AG7	Summary of relevant Secretary of State and Inspector Appeal Decisions
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Core Documents

- CD4.1 St Albans Local Plan Review (1994)
- CD4.2 St Stephen Parish Neighbourhood Plan 2019 – 2036 (2022)
- CD4.4 St Albans City and District Council Affordable Housing Supplementary Planning Guidance (2004)
- CD8.8 Emerging Local Plan 2041 (Regulation 18)
- CD8.1 South West Hertfordshire Strategic Housing Market Assessment (2016)
- CD8.2 South West Hertfordshire Local Housing Need Assessment (2020)
- CD8.6 St Albans City and District Council Housing Strategy
- CD8.4 St Albans City and District Council Homelessness Strategy 2022-2025
- CD8.3 St Albans City and District Council Corporate Plan 2021-2026
- CD8.5 St Albans City and District Council Housing Department Statutory Consultee Comment (April 2022)
- CD8.7 St Albans Authority's Monitoring Report 2023 (March 2024)
- CD5.1 Appeal Decision: Land off Bullens Green, Colney Heath (June 2021)
- CD2.7.1 Appeal Decision: Land to the west of Langton Road, Norton (July 2018)
- CD2.7.2 Appeal Decision: Land to the rear of the former Dylon International Premises, Station Approach, Lower Sydenham, London (June 2019)
- CD2.7.3 Appeal decision: Land at Filands Road Jenner Lane, Malmesbury (January 2022)
- CD2.7.4 Appeal Decision: Land at Dene Road, Cotford St Luke (February 2023)
- CD5.6 Appeal Decision: Maitland Lodge, Billericay (November 2022)
- CD2.7.5 Appeal Decision: Land between Lodge Lane and Burtons Lane, Little Chalfont, Buckinghamshire (March 2023)
- CD2.7.6 Appeal Decision: Land adjacent to Cornerways, High Street, Twyning, Tewkesbury (July 2015)
- CD2.7.7 Appeal Decision: Sondes Place Farm, Dorking (November 2023)
- CD2.7.8 Appeal Decision: Land Rear of 248 Hart Road, Thundersley, Benfleet (May 2023)

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by **Annie Gingell BSc (Hons) MSc MRTPI** of **Tetlow King Planning** on behalf of the Appellant, **J K Rudkin Builders Limited**.
- 1.2 The proposed development is for up to 115 dwellings, of which 35% (up to 40 dwellings) are to be provided on-site as affordable housing.
- 1.3 This level of affordable housing provision meets the Affordable Housing Supplementary Planning Guidance (2004) minimum requirement of 35% which relates to Policy 7A of the Local Plan Review (1994).
- 1.4 The proposed affordable housing tenure split will allocate 15% to First Homes and the remaining 85% of the affordable homes will be a mixture of affordable rent and discount market sales housing.
- 1.5 The proposed affordable housing will be secured by way of a Section 106 Planning Obligation.
- 1.6 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision¹ considering evidence of need in the area. It should be read alongside the main Planning Evidence of Brian Parker (McPartland Planning).
- 1.7 My credentials as an expert witness are summarised as follows:
 - I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development from Cardiff University (2020).
 - I am a chartered member of the Royal Town Planning Institute (“RTPI”).
 - I have over 9 years’ professional experience in the field of town planning and housing. I have previously been employed by a Local Authority in the South West

¹ For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

and have been in private practice since 2017. I have been employed at Tetlow King Planning Ltd for the past 7 years.

- During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East of England, and London.
- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging Development Plan Documents and Supplementary Planning Documents on affordable housing throughout the UK.

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

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

1.9 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government.

1.10 This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper.

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

1.12 As part of my evidence, I have sought data, upon which I rely, from the Council through Freedom of Information ("FOI") requests which can be viewed at **Appendix AG1**.

1.13 This Proof of Evidence comprises the following nine sections:

- Section 2 establishes the importance of affordable housing as an important material consideration;
- Section 3 analyses the Development Plan and related policy framework including corporate documents;
- Section 4 identifies affordable housing needs in St Albans;
- Section 5 examines past affordable housing delivery in St Albans;

- Section 6 analyses a range of affordability indicators in St Albans;
- Section 7 considers the future supply of affordable housing in St Albans;
- Section 8 analyses affordable housing need and delivery in the local area
- Section 9 considers the weight to be attached to the proposed affordable housing provision;
- Section 10 draws together my Summary and Conclusions.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

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

National Planning Policy Framework (19 December 2023)

- 2.2 The revised NPPF was last updated on 19 December 2023 and is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 2.3 The NPPF (2023) sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective is to *"support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations"* (paragraph 8).
- 2.4 Chapter 5 of the NPPF (2023) focuses on delivering a sufficient supply of homes; and paragraph 60 confirms the Government's objective of *"significantly boosting the supply of homes"*.
- 2.5 The NPPF (2023) is clear that local authorities should deliver a mix of housing sizes, types, and tenures for different groups, which include *"those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers [FN28]; people who rent their homes and people wishing to commission or build their own homes [FN29]."* (paragraph 63).
- 2.6 It places a great responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. Paragraph 66 establishes that *"at least 10% of the total number of homes to be available for affordable home ownership [FN32]"*.

- 2.7 Affordable housing is defined within the NPPF (2023) glossary as affordable housing for rent (in accordance with the Government’s rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents), Starter Homes, discounted market sales housing (at least 20% below local market value) and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.8 The Planning Practice Guidance (“PPG”) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application. **Appendix AG2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

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

The Development Plan and Related Policies

Section 3

Introduction

- 3.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises the St Albans Local Plan Review (1994) (**CD4.1**) and the St Stephen Neighbourhood Plan (2022) (**CD4.2**)
- 3.3 Other material considerations relevant to affordable housing include National Planning Policy Framework (2023); the Planning Practice Guidance (March 2014, ongoing updates); the St Albans City and District Council Affordable Housing Supplementary Planning Guidance (2004) (**CD4.4**); the emerging Local Plan 2041 (Regulation 18 version) (**CD8.8**); and a number of corporate documents which support the provision of affordable housing at the corporate level.

The Development Plan

The St Albans Local Plan Review (1994) – CD4.1

- 3.4 The St Albans District Local Plan review was adopted in November 1994, covering the period 1981 to 1996 (and, for Housing, 2001²). In 2007, a Direction was made saving specified policies of the Plan. The saved policies are therefore the remaining operational policies within the district until replaced by a new Local Plan.
- 3.5 The Plan has two saved policies relating to affordable housing. The first is **Policy 7A** which is concerned with affordable housing in towns and specified settlements. The policy states that:

“In the towns and specified settlements as defined in Policy 2, the Council will therefore normally seek to negotiate an element of affordable housing on sites

² Policy 3 Housing Land Supply 1981-1996 and 1986-2001.

over 0.4 hectares and on sites under this size where 15 or more dwellings are proposed.”

- 3.6 The policy also sets a target of 200 affordable dwellings per annum in its supporting text (paragraph 3.36). However, the policy accepts that this represents a considerable under-estimation of the total need for affordable housing. Clearly, given the length of time since this figure was formulated, it can be given no weight now.
- 3.7 The second affordable housing policy is **Policy 8** which is concerned with affordable housing in the metropolitan Green Belt. The policy states that permission for affordable housing for local needs will only be granted where 100% of the new dwellings affordable.
- 3.8 However, Policy 8 also requires the proposed housing to meet only the needs of the relevant Parish, to be within the reasonable physical limits of a Green Belt Settlement and, normally, to be on a small site of c.0.4 hectares, none of which apply to the appeal proposals.
- 3.9 At a meeting of the Planning Referrals Committee on 26 July 2021, Planning Officers confirmed that Policy 8 does not apply to major sites in the Green Belt.
- 3.10 It is therefore considered that the Development Plan is silent on affordable housing requirements for the appeal proposals as the proposed development is not located within a specified town or settlement, is not proposed as a 100% affordable scheme, and exceeds 0.4 hectares in size.

St Stephen Neighbourhood Plan (2022) – CD4.2

- 3.11 The St Stephens Neighbourhood Plan was ‘Made’ on 20 July 2022 and forms part of the St Albans Development Plan, covering the 17-year period between 2019 to 2036, providing a guide for development within the St Stephen over the period.
- 3.12 The Plan does not provide any specific policies for affordable housing. It does, however, make reference to affordability issues facing the area.

Other Material Considerations

St Albans City and District Council Affordable Housing Supplementary Planning Guidance (2004) – CD4.4

- 3.13 The St Albans City and District Council Affordable Housing Supplementary Planning Guidance (“SPG”) was adopted by the Council in March 2004. The SPG sets out the Council’s negotiation position for the element of affordable housing to be delivered on suitable development sites.
- 3.14 The SPG provides supplementary guidance on the Council’s main policy on Affordable Housing, Policy 7A of the District Plan, which is set out in Appendix B.
- 3.15 Paragraph 1.11 of the SPG 2004 states
- “Policy 7A is entitled ‘Affordable housing in towns and specified settlements’. Policy 2 in the District Plan classifies St Albans and Harpenden as towns and Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street/Frogmore, Redbourn and Wheathampstead as specified settlements (i.e. large villages excluded from the Green Belt). This SPG will also apply to open market housing developments that may be permitted in the Green Belt.”*
- 3.16 At paragraph 7.13, the SPG goes on to note that *“The Council will seek, by negotiation, a target level of 35% affordable units on suitable sites above the site size thresholds.”*
- 3.17 The SPG states at paragraph 7.10 that the Council is applying the threshold of Circular 6/98, meaning that affordable housing is required on all sites of 1ha or more, or of 25+ dwellings, and that the Council will seek an on-site affordable housing provision equivalent to 35% of dwellings.
- 3.18 However, Circular 6/98 is no longer relevant and St Albans City and District Council therefore applies the threshold that affordable housing is required on sites where 15 or more dwellings are proposed, as set out in Policy 7A, across the entire District.
- 3.19 It should also be noted that paragraph 64 of the National Planning Policy Framework (“NPPF”) (2023) is clear that:
- “Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)” (my emphasis).*

- 3.20 Annex 2 of the 2021 NPPF defines major development for housing as “*development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more*”.

Emerging Local Plan 2041 – CD8.8

- 3.21 The Council is currently preparing a new Local Plan to 2041 and the Regulation 18 consultation ran from 12 July 2023 to 25 September 2023. The Council’s latest Local Development Scheme shows that a Regulation 19 version of the emerging Local Plan will be published for consultation between October and December 2024.
- 3.22 Pages 6 to 7 of the emerging Local Plan 2041 (Regulation 18) set out ‘A Brief Portrait of St Albans City and District’. Paragraph 1.27 states that:

“Overall, the District is prosperous, with above average levels of highly qualified professionals and high average salaries of residents. Combined with the good quality of life offered in the area, this means that house prices are very high throughout the District, averaging £619,567 in 2022. This success has the effect of making the area unaffordable for many, and a shortage of reasonably priced accommodation is an important issue. Whilst the residents are on average prosperous, there are individuals and areas that are more deprived.” (my emphasis).

- 3.23 The supporting text to **emerging Policy HOU2** ‘Affordable Housing’ (paragraph 4.8, page 44) explains that:

“The District’s house prices are amongst the highest not only in Hertfordshire, but across the whole country. As a result, local people on lower-level incomes, especially younger people, and key workers, often find themselves priced out of the market, and there is clearly a high need for affordable housing. This is also reflected by the number of people on the Council Housing Register³.”

Emerging Policy HOU2 states that 40% affordable housing should be provided in residential development proposals (Class C3) where 10 or more homes are proposed, or on sites of 0.5ha or more. **Corporate Documents**

- 3.24 The Council’s corporate documents identify the delivery of affordable housing as a high corporate priority of St Albans City and District Council. These include the following documents:

³ On 31 March 2023 there were 376 households on the Council’s Housing Register – please see Section 4 of this Proof of Evidence for full details.

- St Albans City and District Council Housing Strategy 2023 – 2026 (**CD8.6**);
- St Albans City and District Council Homelessness Strategy 2022 - 2025 (**CD8.4**);
and
- St Albans City and District Council Corporate Plan 2021 - 2026 (**CD8.3**).

3.25 Summaries of each of these documents are provided at **Appendix AG3** and quotes from each of the documents are referred to throughout this evidence.

Summary and Conclusions

3.26 The relevant Development Plan for St Albans City and District Council in respect of affordable housing matters currently comprises the St Albans District Local Plan Review (1994).

3.27 The evidence set out within this section clearly highlights that, within adopted policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority for St Albans City and District Council.

3.28 Given the recognised need for affordable housing across St Albans, the appeal proposals provide an affordable housing contribution which would contribute significantly towards the requirements of the Council's Affordable Housing SPG and emerging Policy HOU2 to meet the identified need for affordable housing in St Albans City and District.

Affordable Housing Needs in St Albans

Section 4

Introduction

- 4.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the District.
- 4.2 In addition to formal assessments, this section examines other indicators of affordable housing need such as the Housing Register, waiting times, and homelessness rates. These real-world metrics offer additional insights and perspective on the pressing need for affordable housing in St Albans.

Development Plan and Evidence Base

- 4.3 The Council's Development Plan currently comprises the St Albans Local Plan Review which was adopted in 1994. As such, the evidence base for this plan is wholly out-of-date, and not considered relevant to this appeal.

Emerging Development Plan and Evidence Base

- 4.4 The emerging Local Plan 2041 is at Regulation 18 consultation stage, which took place between July and September 2023. Both the South West Hertfordshire Strategic Housing Market Assessment (2016) and the South West Hertfordshire Local Housing Need Assessment (2020) form part of the evidence base for the emerging Plan.

South West Hertfordshire Strategic Housing Market Assessment (2016) – CD8.1

- 4.5 The South West Hertfordshire Strategic Housing Market Assessment (“2016 SHMA”) was published in January 2016 and covers the 23-year period 2013 to 2036.
- 4.6 Table 39 of the 2016 SHMA sets out the annualised estimated affordable housing need for each Authority and is replicated below at Figure 4.1. It demonstrates that St Albans and Watford jointly have the highest affordable housing need across the region.

Figure 4.1: Estimated level of Affordable Housing Need per annum – by location

Area	Current need	Newly forming households	Existing households falling into need	Total need	Supply	Net need
Dacorum	30	609	308	947	581	366
Hertsmere	34	519	181	735	301	434
St Albans	33	663	161	858	241	617
Three Rivers	17	419	110	546	189	357
Watford	52	549	254	855	237	617
South West Herts	167	2,760	1,014	3,941	1,550	2,391

Source: 2016 SHMA - Table 39

- 4.7 Table 40 (replicated at Figure 4.2 below) sets out estimated levels of affordable housing need at other variant income thresholds. The table finds that, at a gross 25% income threshold (the recommended threshold in the now withdrawn 2007 SHMA guidance), the annual affordable housing need for St Albans increases to 764 affordable homes per annum over the period, an uplift of 24% from the 617 pa figure.

Figure 4.2: Estimated level of Affordable Housing Need (per annum) at Variant Income Thresholds – by location

Area	25%	30%	35%	40%
Dacorum	523	366	237	126
Hertsmere	527	434	346	272
St Albans	764	617	497	398
Three Rivers	442	357	284	223
Watford	727	617	517	429

Source: 2016 SHMA, Table 40, Page 113

- 4.8 Table 43 on page 120 sets out estimated level of affordable housing need per annum by type of affordable housing. It identifies a net need for 102 intermediate affordable properties and 515 social/affordable rented properties per annum⁴ in St Albans.
- 4.9 The 2016 SHMA was prepared, however, prior to the implementation of the updated Annex 2 definition of affordable housing in the revised 2018 NPPF (now July 2021 version). The calculation of need within the 2016 SHMA therefore does not make provision for the range of affordable routes to home ownership included within the current definition of affordable housing.

⁴ 102 + 515 = 617 dwellings

- 4.10 If these households were also to be factored in to the calculation of affordable housing need, it is likely that the net affordable housing need figure for St Albans would increase further.

South West Hertfordshire Local Housing Need Assessment (2020) – CD8.2

- 4.11 The South West Hertfordshire Local Housing Need Assessment (“2020 LHNA”) was published in September 2020 and covers the 16-year period from 2020 to 2036.
- 4.12 Paragraph 5.50 on page 79 sets out that, for St Albans, a 35% income threshold has been used to calculate rental affordability. In respect of income thresholds for owner-occupation, paragraph 5.53 sets out that it has been assumed a household has a 10% deposit and can secure a mortgage for four and a half times their salary.
- 4.13 Table 37 on page 89 identifies a need for 443 net affordable/social rented affordable dwellings per annum over the period. Table 42 on page 97 identifies a need for 385 net affordable home ownership dwellings per annum over the period.
- 4.14 In total, therefore, there is an objectively assessed need for 828 affordable dwellings per annum for the period 2020 to 2036 in St Albans. This figure is 34% higher than the affordable needs identified in the 2016 SHMA (617 pa). It is worth noting that the affordability threshold used is 5% higher than in the 2016 SHMA.
- 4.15 It is also worth noting that this issue was considered in a recent appeal decision (February 2023) at Land at Dene Road, Cotford St. Luke (**CD2.7.4, p.18-17, [100-101]**), wherein Inspector Bristow found as follows, at paragraphs 100 to 101 of his decision letter:

“In TBDC’s Strategic Housing Market Assessment of 2016 (‘SHMA’), affordable housing needs were forecast to be 161dpa. However, in SWTC’s Local Housing Needs Assessment document of 2020 (‘LHNA’), affordable housing needs were forecast, across a much wider geography following the local government reorganisation referenced in paragraph 4 of this decision, to be only 158dpa. Given evidence of the decreasing affordability of housing based on affordability ratios, and also rising numbers of individuals on the Somerset Homefinder Register, that is surprising.

I understand that differential arises, in large part, as the SHMA was based on 29% of household spending being devoted to housing costs, whereas the LHNA is premised on up to 35% of household spending being used in that way. In itself that reflects the decreasing affordability of housing. Inputting into the

calculation that households are necessarily devoting more of their income to meeting housing costs **poses a real risk of circularity and underrepresentation of need.**” (my emphasis).

- 4.16 Indeed, the 2020 LHNA makes the recommendation on page 112 that “*Such is the scale of affordable housing need that the local authorities should seek to deliver as much affordable housing to rent as viability allows.*”

Local Housing Need vs Affordable Housing Need

- 4.17 The Council’s 2023 Authority’s Monitoring Report (**CD8.7**) sets out that the Council’s overall housing need for the period 2023/24 to 2026/27 is being calculated using a figure based on the Government’s Standard Methodology for assessing Local Housing Need.

- 4.18 Whilst the Standard Method for calculating Local Housing Need applies an affordability adjustment, the PPG is clear that:

*“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the **affordability of homes**”⁵ (emphasis added).*

- 4.19 Evidently, providing an affordability adjustment to start to address the affordability of homes in an Authority is clearly not the same as calculating an affordable housing need figure. The affordability uplift is simply a function of the standard methodology, and it is not a basis for determining the numerical need for affordable housing nor the types of affordable housing required as defined in Annex 2 of the NPPF (2023).

- 4.20 This is further supported by the fact that calculating such need for an Authority is dealt with under a separate section of the PPG, entitled ‘*How is the total annual need for affordable housing calculated?*’, which clearly sets out that⁶:

“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.”

⁵ Paragraph: 006 Reference ID: 2a-006-20190220

⁶ Paragraph: 024 Reference ID: 2a-024-20190220

4.21 The NPPF is clear, at paragraphs 63, that:

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

4.22 Whilst the Standard Method calculation may be appropriate for monitoring general housing needs and supply across the Authority, it does not provide a need figure for affordable housing in line with the PPG. As such, it does not reflect affordable housing need; nor is it an appropriate basis with which to monitor affordable housing supply.

4.23 In a similar fashion, the achievement of Housing Delivery Test targets does not signify that affordable housing needs have been being met over a period when using the standard method to calculate the ‘number of homes required’ for a Local Authority area.

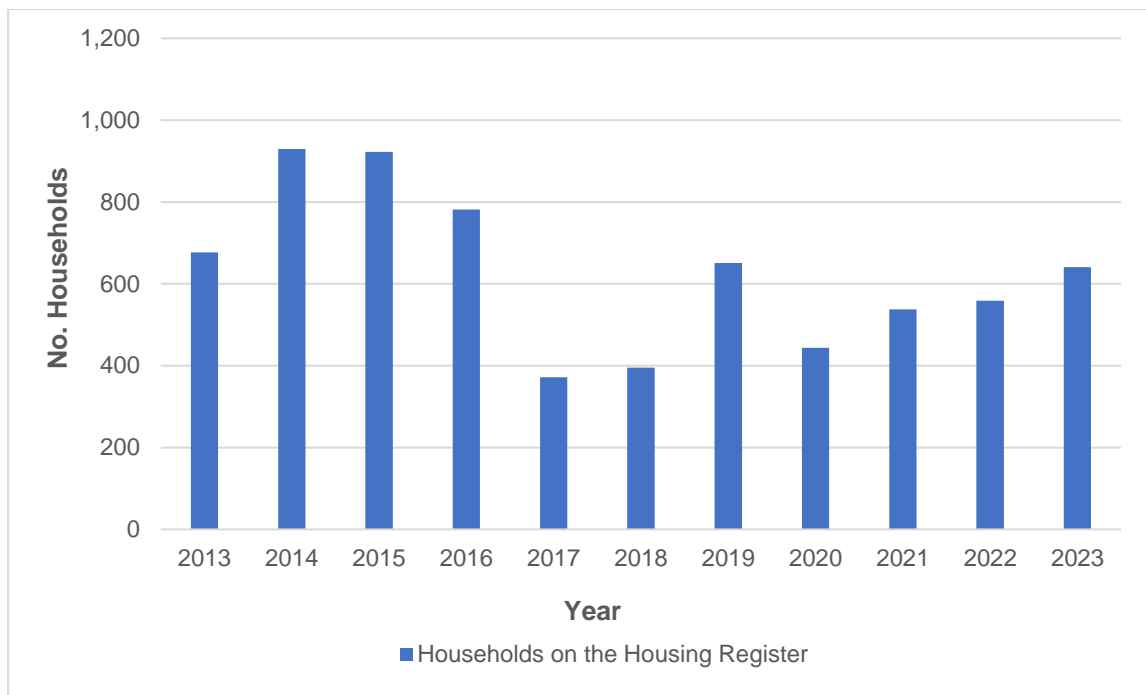
Indicators of Affordable Housing Need

4.24 Key indicators like the number of households on the Council's Housing Register, homelessness rates and households housed in temporary accommodation, all serve as crucial markers of affordable housing need in St Albans.

Housing Register

4.25 The Council's FOI response (**Appendix AG1**) shows that on 31 March 2023 there were **641 households on the Housing Register in St Albans**. This represents a 15% increase from the previous year, when the figure stood at 559 households.

Figure 4.3: Number of Households on the Housing Register, 2013 to 2023



Source: DLUHC Open Data; and Freedom of Information Response (11 May 2023).

- 4.26 Footnote 4 of Department for Levelling Up Homes and Communities (“DLUHC”) Live Table 600 highlights that:

“The Localism Act 2011, which came into force in 2012, gave local authorities the power to set their own qualification criteria determining who may or may not go onto the housing waiting list. Previously, local authorities were only able to exclude from their waiting list people deemed guilty of serious unacceptable behaviour. The Localism Act changes have contributed to the decrease in the number of households on waiting lists since 2012” (emphasis added).

- 4.27 Following the changes brought about by the Localism Act, St Albans City and District Council published a revised Housing Allocations Scheme in August 2012 which received further revisions in September 2013, December 2013, July 2015, May 2016, August 2018, February 2021, and December 2021.
- 4.28 It is notable that drops in the number of households on the Housing Register largely correspond with the dates of these changes.
- 4.29 Evidently, the result of the Localism Act is that many Local Authorities, including St Albans City and District Council, have been able to exclude applicants already on the Housing Register who no longer meet the new narrower criteria but who are still in need of affordable housing.

Help to Buy Register

- 4.30 The Housing Register falls short in recognising the needs of households unable to afford purchase a home on the open market but are also ineligible to join the Housing Register due to factors like surpassing income limits. Instead, it is possible to identify the extent of need for affordable home ownership options through information from Help to Buy South.
- 4.31 Help to Buy South was one of three agents appointed by the Government to manage the Help to Buy initiative as well as other affordable home ownership options including Shared Ownership. The Help to Buy Register (**Appendix AG4**) shows that on 27 March 2023, **776 households were seeking affordable home ownership across St Albans.**
- 4.32 Whilst the Help to Buy Equity Loan scheme closed at the end of 2022, the extant data from the Help to Buy South system helps to identify the number of households who have registered for an affordable home ownership home in St Albans.

Temporary Accommodation

- 4.33 DLUHC statutory homelessness data highlights that, on 31 March 2023, there were 98 households housed in temporary accommodation by St Albans City and District Council, an increase of 26% from 31 March 2022, when the figure stood at 78.
- 4.34 Of these 98 households, 67% were households with children. The Council has a responsibility to house these households.
- 4.35 Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network, at significant cost to local taxpayers.
- 4.36 The “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” report, published in August 2019 by the Children’s Commissioner, found that temporary accommodation presents serious risks to children’s health, wellbeing, and safety, particularly families in B&Bs, where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 4.37 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room), and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a “*significant impact on many aspects of their lives*”.

Homelessness

- 4.38 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 189 households in need of homelessness prevention duty⁷, and a further 193 households in need of relief duty⁸ from the Council.
- 4.39 Page 3 of the St Albans Homelessness Strategy 2022-2025 (**CD8.4, p.3**) highlights that the top 10 reasons for customers approaching the Council for assistance in 2020/21 were:
1. Asked to leave by family;
 2. Fleeing Domestic Abuse;
 3. Relationship Breakdown;
 4. Section 21 Notice (private rental sector eviction);
 5. Leaving Prison;
 6. Friends no longer willing to accommodate;
 7. Rough Sleeping;
 8. Sofa Surfing;
 9. Fleeing Harassment; and
 10. Eviction From Supported Housing.
- 4.40 Furthermore, a 2017 report by the National Audit Office (“NAO”) found that *“The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England.”*

Summary and Conclusions

- 4.41 Both the adopted and emerging Development Plan, while lacking specific numerical targets for affordable homes, integrate a percentage-based approach from qualifying developments, contingent on their location. The 2016 SHMA which underpins the

⁷ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

⁸ The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

emerging Local Plan 2041 (Regulation 18), indicates **a net need for 617 new affordable homes annually**, totalling 14,191 affordable homes over 23 years.

- 4.42 The absence of a defined affordable housing target prompts consideration of more up-to-date objectively assessed needs. The 2020 LHNA which also forms part of the evidence base for the emerging Local Plan 2041 (Regulation 18), accounting for the latest National Planning Policy Framework (NPPF) definitions, suggests a more nuanced and updated approach, reflecting **a net need for 828 affordable dwellings annually**.
- 4.43 Indicators such as the Housing Register and homelessness rates provide additional insights. The Help to Buy Register complements the Housing Register, showcasing the demand for affordable homeownership dwellings.
- 4.44 Temporary accommodation and homelessness statistics highlight the pressing need for affordable housing solutions, emphasising the critical role they play in fostering stable and secure living conditions for vulnerable populations.
- 4.45 In summary, the nature of affordable housing needs in St Albans requires a comprehensive and adaptive approach, integrating the latest data, policy adjustments, and community-specific considerations to effectively address the evolving challenges in the District.

Affordable Housing Delivery in St Albans

Section 5

Introduction

5.1 This section of the evidence analyses the delivery of affordable housing in St Albans. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across St Albans.

Affordable Housing Delivery

5.2 Figure 5.1 illustrates the delivery of affordable housing (“AH”) in St Albans over the ten-year period since the start of the 2016 SHMA period in 2013/14.

Figure 5.1: Additions to Affordable Housing Stock (Net of demolitions), 2013/14 to 2022/23

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Net of demolitions)	AH as a %age of total completions
2013/14	375	-42	-11%
2014/15	313	70	22%
2015/16	396	97	24%
2016/17	340	59	16%
2017/18	385	106	28%
2018/19	624	82	13%
2019/20	437	31	7%
2020/21	516	169	33%
2021/22	314	71	23%
2022/23	401	68	17%
Total	4,101	711	17%
Avg. Pa.	410	71	

Source: St Albans City and District Council Authorities Monitoring Reports (2015 to 2023); and DLUHC Open Data

5.3 Figure 5.1 demonstrates that between 2013/14 and 2022/23, a total of 4,101 net dwellings were delivered in St Albans, equivalent to 410 per annum. Of these, 711 dwellings (net of demolitions) were affordable tenures, equivalent to 71 per annum. This equates to 17% gross affordable housing delivery.

- 5.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy (“RtB”) sales from existing Council and Registered Provider⁹ (“RP”) affordable housing stock. It also does not take account of any acquisitions funded through the receipts from eligible sales.
- 5.5 Figure 5.2 below calculates the additions to affordable housing stock on a per annum basis since the start of the 2016 SHMA period in 2013/14, net of Right to Buy sales and acquisitions.
- 5.6 A net loss of 156¹⁰ affordable dwellings over this period equates to 22% of the additions to gross affordable housing additions figure of 711 affordable dwellings over the ten-year period.

⁹ RtB data on RP sales of affordable housing to RP tenants is contained in the annual Statistical Data Returns (‘SDR’) data sets for the period 2011/12 to 2021/22 published by the Regulator of Social Housing. These figures have been combined on an annual basis to produce total Right to Buy sales.

¹⁰ $(198 + 16) - 58 = 156$ dwellings

Figure 5.2: Net of Right to Buy Additions to Affordable Housing Stock, 2013/14 to 2022/23

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Net of demolitions)	LPA Acquisitions	LPA RtB sales	RP RtB sales	Additions to AH Stock (Net)	Additions to AH Stock (Net) as a %age of total completions
	A	B	C	D	E	F (B + C) - (D + E)	G (F / A) X 100
2013/14	375	-42	n/a	37	2	-81	-22%
2014/15	313	70	n/a	27	1	42	13%
2015/16	396	97	n/a	24	0	73	18%
2016/17	340	59	n/a	24	13	22	6%
2017/18	385	106	1	20	0	87	23%
2018/19	624	82	18	12	0	88	14%
2019/20	437	31	25	15	0	41	9%
2020/21	516	169	14	10	0	173	33%
2021/22	314	71	0	15	0	56	18%
2022/23	401	68	0	14	0	54	13%
Total	4,101	711	58	198	16	555	14%
Avg. Pa.	410	71	10	20	2	56	

Source: St Albans City and District Council Authorities Monitoring Reports (2015 to 2023); and DLUHC Open Data.

5.7 Figure 5.2 demonstrates that, between 2013/14 and 2022/23, the Council has added just 555 net affordable dwellings, equivalent to 56 per annum. This equates to 14% net affordable housing delivery.

Affordable Housing Delivery Compared to Identified Affordable Housing Needs

5.8 When comparison is drawn between affordable housing delivery and the needs identified in the 2016 SHMA since its 2013/14 base date, it can be seen in Figure 5.3 that there has been an accumulated shortfall in the delivery of affordable housing of some -5,615 affordable homes against an identified need for 6,170 over the ten-year period.

Figure 5.3: Additions to Affordable Housing Stock (Net) Compared to Affordable Needs Identified in the 2016 SHMA, 2013/14 to 2022/23

Monitoring Year	Additions to AH Stock (Net)	2016 SHMA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2013/14	-81	617	-698	-698	-13%
2014/15	42	617	-575	-1,273	7%
2015/16	73	617	-544	-1,817	12%
2016/17	22	617	-595	-2,412	4%
2017/18	87	617	-530	-2,942	14%
2018/19	88	617	-529	-3,471	14%
2019/20	41	617	-576	-4,047	7%
2020/21	173	617	-444	-4,491	28%
2021/22	56	617	-561	-5,052	9%
2022/23	54	617	-563	-5,615	9%
Total	555	6,170	-5,615		9%
Avg. Pa	56	617	-562		

Source: St Albans City and District Council Authorities Monitoring Reports (2015 to 2023); DLUHC Open Data; and 2016 SHMA.

5.9 This shortfall is likely to be higher even if the 2016 SHMA calculation of need accounted for all Annex 2 affordable housing tenures. As such the -5,615 dwelling shortfall should be seen as a minimum.

5.10 As demonstrated by Figure 5.3, the delivery of only 555 affordable homes over the period means that no more than 9% of identified affordable housing needs over the period were met. Put another way, at least 91% households in need of an affordable home over the period were let down by the Council’s inability to deliver.

5.11 Figure 5.4 illustrates net affordable housing delivery compared to the affordable housing need of 828 net affordable dwellings as set out in the 2020 LHNA since its 2020/21 base date.

Figure 5.4: Additions to Affordable Housing Stock (Net) Compared to Affordable Needs Identified in the 2020 LHNA, 2020/21 to 2022/23

Monitoring Year	Additions to AH Stock (Net of RtB)	2020 LHNA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	173	828	-655	-655	21%
2021/22	56	828	-772	-1,427	7%
2022/23	54	828	-774	-2,201	7%
Total	283	2,484	-2,201		11%
Avg. Pa	94	828	-734		

Source: St Albans City and District Council Authorities Monitoring Reports (2015 to 2023); DLUHC Open; and 2020 LHNA.

5.12 Since the start of the 2020 LHNA period in 2020/21, affordable housing completions have averaged just 94 net affordable dwellings per annum, against a need of 828 net affordable dwellings per annum. **A shortfall of -2,201 affordable dwellings has arisen in the first three years of the 2020 LHNA assessment period**, equivalent to an average annual shortfall of -734 affordable dwellings.

5.13 As demonstrated by Figure 5.4, the delivery of only 283 Net of Right to Buy affordable homes over the period means that no more than 11% of identified affordable housing needs over the period were met. Put another way, at least 89% households in need of an affordable home over the period were let down by the Council’s inability to deliver.

Affordable Housing Delivery Compared to Households on the Housing Register

5.14 The affordable housing needs of households on the Housing Register is met either by social rented or affordable rented tenures. Both these tenures are exclusively provided by RP’s or local Councils, with the level of rent payable set in accordance with the Government’s rent policy.

- 5.15 The affordable housing needs of households on the Housing Register is met either by social rented or affordable rented tenures. Both these tenures are exclusively provided by RP's or local Councils, with the level of rent payable set in accordance with the Government's rent policy.
- 5.16 Unfortunately, the Council's Annual Monitoring Reports do not breakdown affordable housing completions by tenure for the full period. As such, the only publicly available data breaking down affordable housing completions by tenure for the period 2013/14 to 2022/23 are the DLUHC Open Data tables.
- 5.17 Figure 5.5 below sets out rented affordable housing delivery in St Albans for the period 2013/14 to 2022/23 once recorded Right to Buy sales and acquisitions are accounted for.

Figure 5.5: Rented Additions to Affordable Housing Stock (Net of Right to Buy), 2013/14 to 2022/23

Monitoring Year	Social Rent Additions to AH Stock (Gross)	Affordable Rent Additions to AH Stock (Gross)	LPA Acquisitions	Total RtB Sales	Total Additions to Rented AH Stock (Net of RtB)
	A	B	C	D	F (A+B+C) - D
2013/14	9	65	n/a	39	35
2014/15	25	103	n/a	28	100
2015/16	19	68	n/a	24	63
2016/17	20	48	n/a	37	31
2017/18	4	38	1	20	23
2018/19	66	22	18	12	94
2019/20	54	67	25	15	131
2020/21	56	67	14	10	136
2021/22	2	76	0	15	63
2022/23	10	33	0	14	29
Totals	265	587	58	214	696
Avg. Pa.	27	59	10	21	70

Source: DLUHC Open Data.

- 5.18 Between 2013/14 and 2022/23, a total of 265 gross Social Rented properties and 587 gross Affordable Rent properties were delivered in St Albans, equivalent to a total 852¹¹ gross provision over the period. Once the effect of the Right to Buy is accounted for the gross rented delivery figure falls by 18% to 696 properties.
- 5.19 Figure 5.6 below compares the number of households on the Housing Register on 31 March each year with net of Right to Buy rented affordable housing delivery between 1 April and 31 March the following year, since the start of the 2016 SHMA period in 2013/14.

Figure 5.6: Additions to Rented Affordable Housing Stock (Net of Right to Buy) vs Households on the Housing Register, 2013/14 to 2022/23

Housing Register Date (31 March)	Households on the Housing Register	Monitoring Year	Total Additions to Rented AH Stock (Net of RtB)	%age of Housing Register Need Met
2013	677	2013/14	35	5%
2014	930	2014/15	100	11%
2015	923	2015/16	63	7%
2016	782	2016/17	31	4%
2017	372	2017/18	23	6%
2018	395	2018/19	94	24%
2019	651	2019/20	131	20%
2020	444	2020/21	136	31%
2021	538	2021/22	63	12%
2022	559	2022/23	29	5%
Avg. Pa.	627	Avg. Pa.	70	11%

Source: DLUHC Open Data.

- 5.20 Figure 5.6 demonstrates that in the ten-year period between 2013/14 and 2022/23, on an average per annum basis, St Albans City and District Council have delivered enough rented affordable housing tenures to meet the needs of just 11% of households on the Housing Register. Put another way, on an average per annum basis, 89% of households on the housing Register did not have their housing needs met.

¹¹ 265 + 587 = 852

Summary and Conclusions

- 5.21 The above evidence demonstrates that, across the St Albans administrative area, the delivery of affordable housing has fallen short of meeting identified needs.
- 5.22 The data shows that, on average, only 14% of the overall housing delivery represents net affordable housing, amounting to just 56 net affordable dwellings per annum. When compared against the net affordable housing needs identified in the 2016 SHMA, a cumulative shortfall of -5,615 affordable homes is evident.
- 5.23 Furthermore, the evidence highlights that the recently identified need in the 2020 LHNA points to a net affordable housing need of 828 dwellings per annum. In the first three years of the 2020 LHNA period, the delivery of only 283 net affordable dwellings reveals a shortfall of -2,201 homes, indicating that only 11% of the identified needs were met.
- 5.24 The analysis also underscores the impact of Right to Buy sales on the net additions to affordable housing stock, with a recorded total of 214 sales between 2013/14 and 2022/23, averaging 22 sales and just 10 acquisitions per annum.
- 5.25 The evidence presented paints a clear picture of the challenges and shortcomings in the delivery of affordable housing in St Albans over the past ten-years.
- 5.26 In light of these findings, a substantial increase in affordable housing provision is *urgently required* in St Albans. The identified shortfalls in meeting housing needs, especially in the context of Right to Buy losses, highlight the pressing need for a 'step change' in the approach to affordable housing delivery.

St Albans Affordability Indicators

Section 6

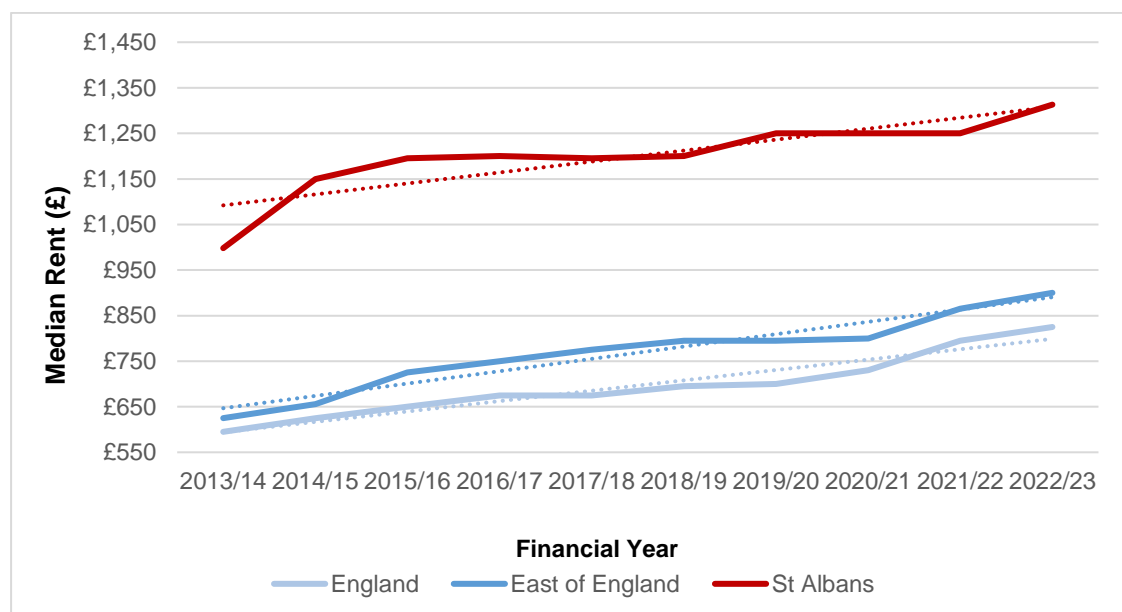
Introduction

- 6.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability¹².

Private Rental Market

- 6.2 Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data (first produced in 2013/14¹³) show that median private rents in St Albans stood at £1,313 per calendar month (“pcm”) in 2022/23. This represents a 32% increase from 2013/14 where median private rents stood at £998 pcm.

Figure 6.1 Median Private Sector Rents, 2013/14 to 2022/23



Source: VOA and ONS.

¹² I acknowledge that this is in the context of Plan-making.

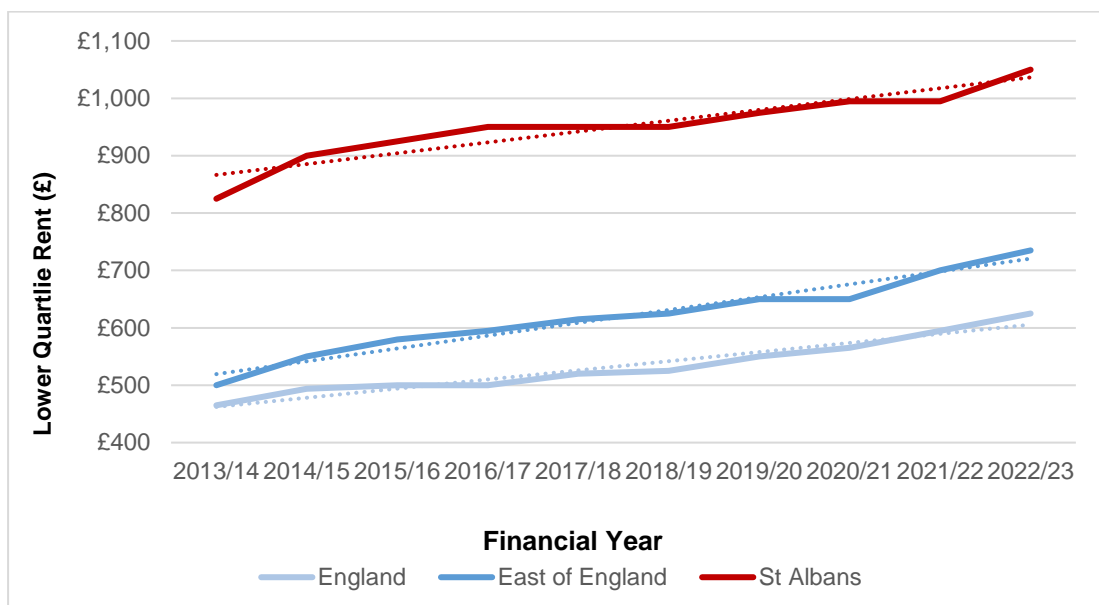
¹³ Start of the 2016 SHMA period

6.3 A median private rent of £1,313 pcm in 2022/23 is 46% higher than the East of England figure of £900 pcm and 59% higher than the national figure of £825 pcm. It should also be noted that since the start of the 2020 LHNA period median rents in 2020/21 have increased by 6%.

6.4 Lower quartile private sector rents are representative of the ‘entry level’ of the private rented sector and include dwellings sought by households on lower incomes.

6.5 The average lower quartile monthly rent in St Albans in 2022/23 was £1,050 pcm. This represents a 27% increase from 2013/14 where average lower quartile monthly rents stood at £825 pcm.

Figure 6.2: Lower Quartile Private Sector Rents, 2013/14 to 2022/23



Source: VOA and ONS.

6.6 A lower quartile rent of £1,050 pcm in 2022/23 is 43% higher than the East of England figure of £735 pcm and 68% higher than the national figure of £625 pcm.

6.7 It is important to note that VOA/ONS rental data is calculated using all transaction data i.e., existing lets as well new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in St Albans.

6.8 Figure 6.3 below shows median rents in St Albans for a range of property types in March 2024, using data taken from [Home.co.uk](https://www.home.co.uk). Unfortunately, data is not provided for the lower quartile segment of the rental market.

Figure 6.3: Median Private Sector Rents, March 2024

Size of Property	No. of properties Advertised	Median Rent (pcm)
1-bedroom home	41	£1,350
2-bedroom home	54	£1,750
3-bedroom home	31	£2,250
4-bedroom home	13	£3,000
5-bedroom home	6	£4,000

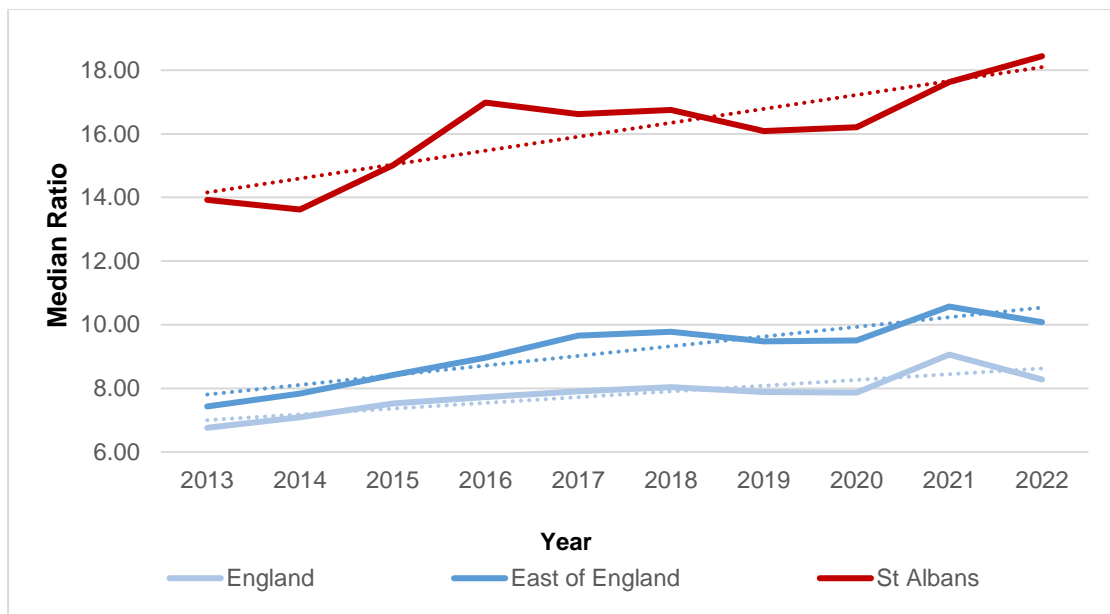
Source: [Home.co.uk](https://www.home.co.uk).

- 6.9 Figure 6.3 illustrates that current median rents for new tenancies in St Albans across all property types surpass the median private rent of £1,313 per calendar pcm in 2022/23.
- 6.10 The rent differentials are striking, with 1-bedroom properties at 3% higher, 2-bedroom properties at 29% higher, 3-bedroom properties at 53% higher, 4-bedroom properties at 78% higher, and 5-bedroom properties at 101% higher.
- 6.11 This stark contrast further underscores the significant disparity in rental costs between new tenancies and the overall median private rent data in St Albans. This implies that lower quartile rents are also likely to be significantly higher than stated.

Median House Prices

- 6.12 The ratio of median house prices to median incomes in St Albans now stands at **18.44**, a 25% increase since the start of the 2016 SHMA period in 2013 where it stood at 13.92. A ratio of 18.44 in St Albans stands substantially above the national median of 8.28 (+123%) and significantly above the East of England median of 10.08 (+83%).

Figure 6.4: Median Workplace-Based Affordability Ratio comparison, 2013 to 2022



Source: ONS.

- 6.13 It is also worth noting that a figure of 8 times average incomes was described as a problem by the former Prime Minister in the foreword to the White Paper entitled ‘Fixing our broken housing market’. Here, the affordability ratio is some 131% higher than that.
- 6.14 As demonstrated by Figure 6.5 below St Albans has the highest median house price to income ratio across all 45 Local Authorities in the East of England region. An affordability ratio of 18.44 in St Albans is 19% higher than the figure of 15.48 for Epping Forest which ranks second in the region.

Figure 6.5: Median Affordability Ratio's for Local Authorities in the East of England Comparison, 2013 to 2022

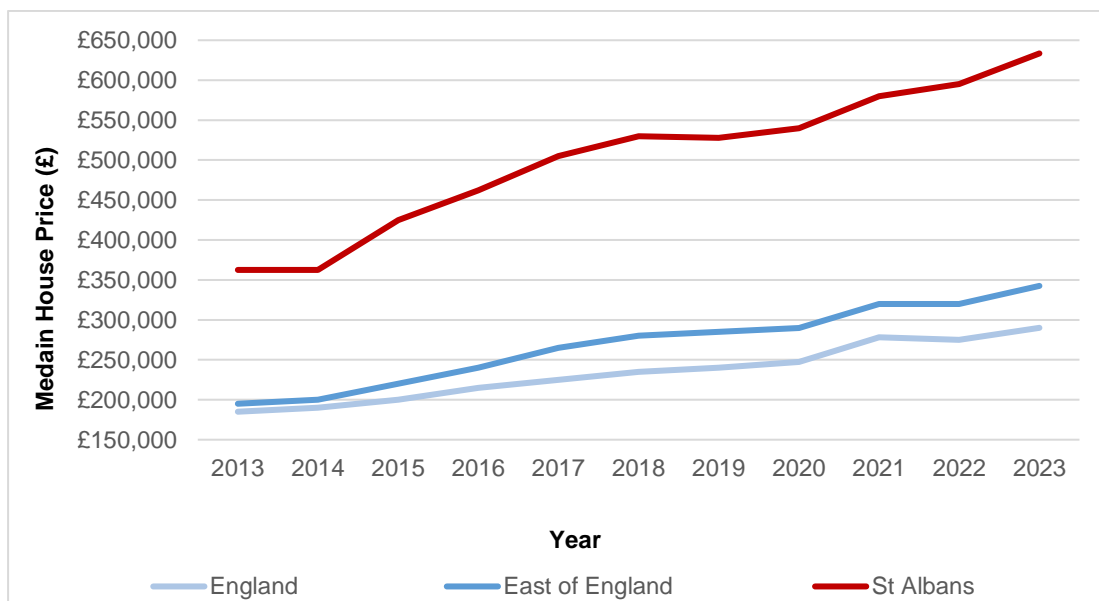
2022 Rank	Local Authority	Ratio of median house prices to median gross annual workplace based earnings	
		2013	2022
1	St Albans	13.92	18.44
2	Epping Forest	11.33	15.48
3	Hertsmere	10.17	14.39
4	Watford	7.74	14.21
5	Dacorum	8.86	13.86
6	Brentwood	8.91	13.65
7	Cambridge	9.61	13.25
8	Uttlesford	11.22	13.18
9	Three Rivers	10.28	13.17
10	Babergh	8.91	12.64
11	East Hertfordshire	9.12	12.29
12	Rochford	8.99	12.23
13	Castle Point	9.55	12.22
14	Chelmsford	8.17	12.21
15	Broxbourne	8.64	11.88
16	Southend-on-Sea	7.45	11.53
17	Welwyn Hatfield	8.74	11.43
18	Basildon	6.55	11.18
19	North Hertfordshire	8.07	11.17
20	Harlow	6.57	10.76
21	Maldon	7.32	10.71
22	North Norfolk	8.59	10.64
23	Central Bedfordshire	7.75	10.60
24	East Cambridgeshire	7.53	10.58
25	South Cambridgeshire	7.74	10.46
26	Mid Suffolk	7.35	10.28
27	Braintree	7.17	10.25
28	Thurrock	6.57	9.97
29	Colchester	7.41	9.73
30	West Suffolk	7.46	9.55
31	Bedford	7.31	9.52
32	Huntingdonshire	6.96	9.39

33	Breckland	6.99	9.25
34	Broadland	7.19	9.25
35	South Norfolk	7.13	9.13
36	Luton	5.93	8.84
37	King's Lynn and West Norfolk	6.54	8.64
38	Tendring	6.69	8.63
39	Stevenage	5.73	8.41
40	East Suffolk	6.82	8.35
41	Fenland	5.57	7.91
42	Norwich	5.94	7.83
43	Ipswich	5.53	7.20
44	Peterborough	5.07	7.19
45	Great Yarmouth	5.28	6.70

Source: ONS.

- 6.15 Figure 6.6 illustrates the median house sale prices for England, the East of England, and St Albans. It demonstrates that they have increased dramatically between the start of the 2016 SHMA period in 2013 and 2023.

Figure 6.6: Median House Price Comparison, 2013 to 2023



Source: ONS.

- 6.16 The median house price across St Albans has risen by 75% from £362,500 in 2013 to £633,500 in 2023. This compares to a 76% increase across the East of England and a national increase of 57% over the same period.

6.17 In 2023 median house prices in St Albans (£633,500) were 85% higher than across the East of England (£342,500) and 118% higher than the national figure (£290,000). It should also be noted that since the start of the 2020 LHNA period median house prices in 2020 have increased by 17%.

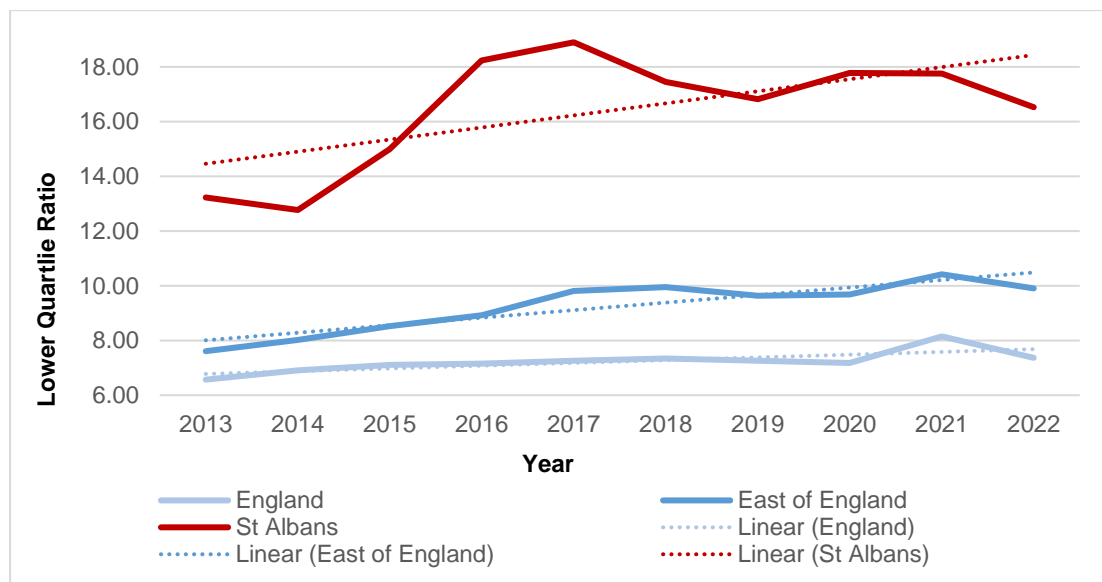
Lower Quartile House Prices

6.18 For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to incomes in St Albans now stands at **16.53**, a 25% increase since the start of the 2016 SHMA period in 2013, when it stood at 13.23.

6.19 This means that those on lower quartile incomes in St Albans, seeking to purchase a median priced property, now need to find more than 16 times their annual income to do so.

6.20 Once again, it remains the case that the ratio in St Albans stands substantially above the national average of 7.37 (+124%) and significantly above the Region average of 9.90 (+67%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.

Figure 6.7: Lower Quartile Workplace-Based Affordability Ratio comparison, 2013 to 2022



Source: ONS.

6.21 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 267% higher than that.

6.22 As demonstrated by Figure 6.8 below, St Albans has the highest lower quartile house price to income ratio across all 45 Local Authorities in the East of England region and shows no sign of improvement since 2013, with an increase of 25% over this period.

Figure 6.8: Lower Quartile Affordability Ratio's for Local Authorities in East of England Comparison, 2013 to 2022

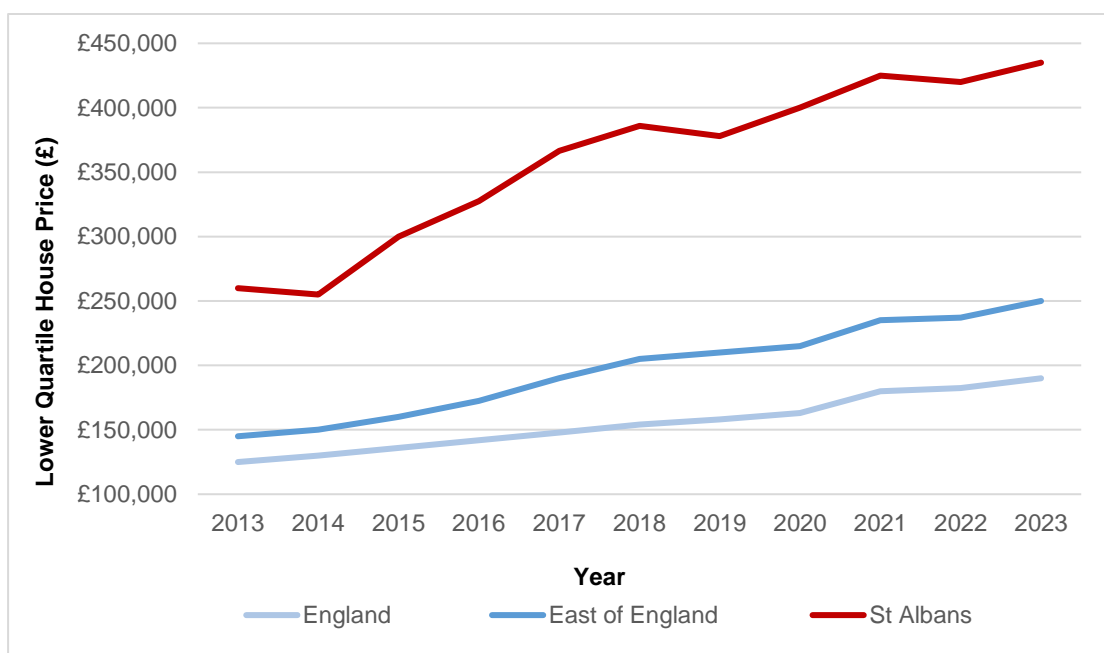
2022 Rank	Local Authority	Ratio of lower quartile house prices to median gross annual workplace based earnings	
		2013	2022
1	St Albans	13.23	16.53
2	Uttlesford	11.66	15.30
3	Epping Forest	12.02	15.28
4	Dacorum	9.63	15.23
5	Hertsmere	11.06	13.98
6	Brentwood	9.99	13.31
7	Cambridge	9.87	13.24
8	Watford	8.54	13.19
9	Three Rivers	11.22	12.85
10	Castle Point	10.10	12.18
11	East Hertfordshire	10.44	12.17
12	Chelmsford	9.02	12.01
13	Welwyn Hatfield	9.08	11.99
14	Southend-on-Sea	7.40	11.71
15	Maldon	8.17	11.67
16	Basildon	7.40	11.65
17	Rochford	9.75	11.49
18	Broxbourne	8.15	11.40
19	Babergh	8.89	11.39
20	Central Bedfordshire	9.00	11.36
21	South Cambridgeshire	8.99	11.18
22	Harlow	7.62	11.12
23	North Hertfordshire	8.86	10.99
24	Braintree	8.40	10.83
25	Thurrock	7.32	10.69
26	Luton	6.98	10.41
27	East Cambridgeshire	8.46	10.19
28	Mid Suffolk	7.58	10.16

29	Bedford	7.51	10.10
30	Broadland	8.16	10.10
31	Stevenage	7.31	10.02
32	Colchester	7.63	9.85
33	South Norfolk	7.69	9.79
34	West Suffolk	7.67	9.78
35	North Norfolk	7.45	9.35
36	Breckland	7.68	9.22
37	Huntingdonshire	6.87	9.21
38	Tendring	6.65	9.07
39	East Suffolk	6.89	8.71
40	King's Lynn and West Norfolk	7.51	8.56
41	Fenland	6.18	8.23
42	Peterborough	5.37	7.59
43	Norwich	6.60	7.59
44	Ipswich	5.84	7.51
45	Great Yarmouth	6.02	6.37

Source: ONS.

- 6.23 Figure 6.9 illustrates the lower quartile house sale prices for England, East of England, and St Albans. It demonstrates that they have increased dramatically between the start of the 2016 SHMA period in 2013 and 2023.

Figure 6.9: Lower Quartile House Prices, 2013 to 2023



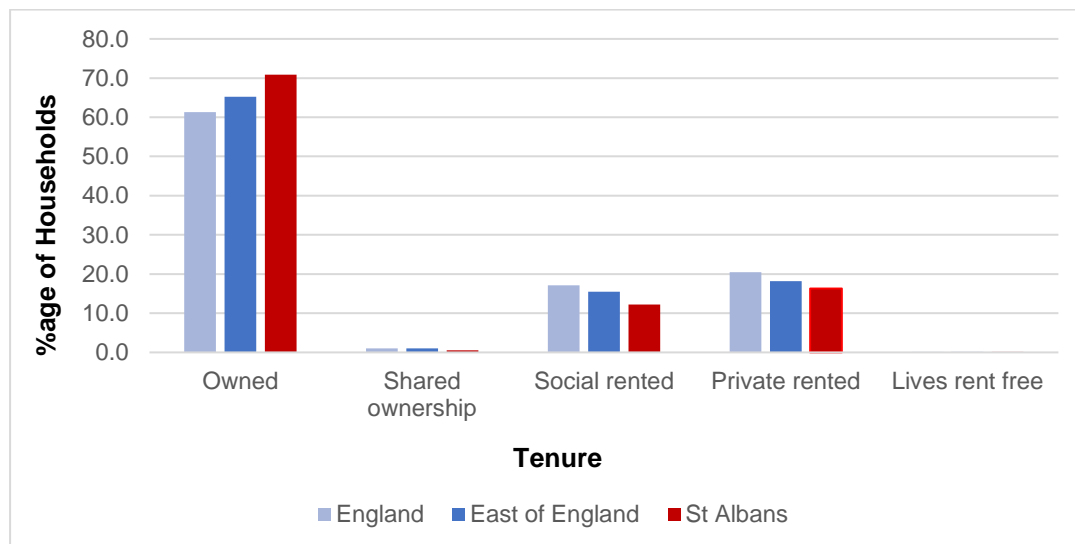
Source: ONS.

- 6.24 The lower quartile house price across St Albans has risen by 67% from £260,000 in 2013 to £435,000 in 2023. This compares to a 72% increase across the East of England and a national increase of 52% over the same period.
- 6.25 In 2023 lower quartile house prices in St Albans (£435,000) were 74% higher than across the East of England (£250,000) and 129% higher than the national figure (£190,000). It should also be noted that since the start of the 2020 LHNA period median rents in 2020 have increased by 9%.

Tenure Comparison

- 6.26 Figure 6.10 illustrates the tenure mix in England, the East of England and St Albans, using data from the 2021 Census.

Figure 6.10: Tenure, 2021



Source: Census 2021. Chart excludes households 'living rent free' as this accounts for <0.2% of households at all geographic levels).

- 6.27 The tenure mix in St Albans diverges from that of England and the East of England. In St Albans, the proportion of owner occupiers stands at 70.9% of households (compared with 65.2% in the East of England and 61.3% in England). The proportion of social renters in St Albans is correspondingly smaller, at 12.2% (compared with 15.5% in the East of England and 17.1% in England).
- 6.28 This should be viewed in context of the fact that at the time of the 2011 Census there were just 261 (0.5%) Shared Ownership dwellings in St Albans. This means that over the ten-year period between 2011 and 2021, the Council has added just 36 Shared Ownership units to its dwelling stock.

- 6.29 As for Social Rent/Affordable rent, this is the third most uncommon tenure within St Albans accounting for just 12.2% of all properties. It can be observed that the presence of Social Rent/Affordable rented tenures are proportionally lower in St Albans than nationally (17.1%) and regionally (15.5%) at the time of the 2021 Census.
- 6.30 At the time of the 2011 census, Social Rent/Affordable rented accommodation accounted for 13.6% of all properties across St Albans. This means that the proportion of Social Rent/Affordable rent properties across St Albans has decreased from 13.6% to 12.2% over the ten-year period between 2011 and 2021. This should be viewed in context of a regional increase in Social Rent/Affordable rented tenures from 14.7% in 2011 to 15.5% in 2021.

Summary and Conclusions

- 6.31 **As demonstrated through the analysis in this section, affordability across St Albans has been and continues to be, in crisis.**
- 6.32 The key priority identified by the adopted Development Plan has not been addressed. Rather, affordability and the availability of affordable housing has significantly worsened. Similarly, since the start of the 2020 LHNA period, affordability has continued to decline.
- 6.33 House prices and rent levels in both the median and lower quartile segments of the market are increasing whilst, at the same time, the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in St Albans out of the reach of more and more people.
- 6.34 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in St Albans, with a lower quartile house price to average income ratio of 16.53. Market signals indicate a worsening trend in affordability in St Albans.
- 6.35 **By any measure of affordability, this is an Authority in the midst of an affordable housing crisis.**

Future Supply of Affordable Housing

Section 7

Introduction

- 7.1 This section of the evidence considers the future supply of affordable housing across St Albans in comparison with identified needs.

Addressing the Shortfall in Affordable Housing Delivery

- 7.2 The 2020 LHNA identifies an objectively assessed need for 828 net affordable homes per annum between 2020 and 2036. Over the 16-year period this equates to a total need for 13,248 net affordable homes.
- 7.3 In the first three years of the 2020 LHNA period, the Council have overseen the delivery of 283 net affordable homes against a need of 2,484 net new affordable homes, which has resulted in a shortfall of -2,201 affordable homes.
- 7.4 I consider that any shortfall in delivery should be dealt with within the next five years. This is also an approach set out within the PPG¹⁴ and endorsed at appeal.
- 7.5 The critical importance of understanding the ability of the Council to meet future need was considered in a recent appeal at Sondes Place Farm, Dorking where I provided affordable housing evidence.
- 7.6 The Inspector accepted the findings the ‘future supply of affordable housing’ evidence and endorsed the use of the Sedgefield approach to clear a previous backlog of affordable housing delivery (**CD2.7.7, p.16, [85-86]**):

“Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.

To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to

¹⁴ Paragraph: 031 Reference ID: 68-031-20190722

be substantially below that level of delivery. This will mean the existing shortfall will only become worse.” (my emphasis).

- 7.7 The Inspector went on to outline the consequences of not providing sufficient affordable housing (paragraph 88):

“The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”

- 7.8 It is therefore imperative that the -2,201 dwelling affordable housing shortfall accumulated since 2020/21 is addressed as soon as possible and in any event within the next five years.

- 7.9 When the shortfall is factored into the 2020 LHNA identified need of 828 affordable homes per annum for the period 2023/24 and 2027/28, the number of affordable homes the Council will need to complete increases by 53% to 1,268 net affordable homes per annum over the period.

- 7.10 This would ensure that for the remainder of the 2020 LHNA period up to 2036 the annual affordable housing need reduces to 828 per annum to deal solely with newly arising needs. This is illustrated in Figures 7.1 and 7.2.

Figure 7.1: Annual Affordable Housing Need incorporating Backlog Needs since the 2020/21 base date of the 2020 LHNA

A	Affordable housing need per annum for the period 2020/21 to 2022/23 identified in the 2020 LHNA	828
B	Net Affordable housing need for the period 2020/21 to 2022/23 (A x 3)	2,484
C	Net Affordable housing completions for the period 2020/21 to 2022/23	283
D	Shortfall/backlog of affordable housing need for the period 2020/21 to 2022/23 (B – C)	2,201
E	Backlog affordable housing need per annum required over the period 2023/24 to 2027/28 (D/5)	440*
F	Full affordable housing need per annum for the period 2023/24 to 2027/28 (A + E)	1,268
G	Full affordable housing need for the period 2023/24 to 2027/28 (F x 5)	6,340

* Please note that figures account for rounding

- 7.11 Further indication of the severity of the situation can be seen in Figure 7.2 below which illustrates that the Council need to deliver 6,340 net affordable homes over the next five years to address backlog needs in line with the Sedgfield approach.

Figure 7.2: Annual Affordable Housing Need 2023/24 to 2027/28 incorporating Backlog Needs Accrued from 2020/21 to 2022/23 when applying the Sedgfield Approach

Monitoring Period	2020 LHNA Net Affordable Housing Need per annum	Net Affordable Housing Need per annum When Addressing Backlog Within Next Five Years
2023/24	828	1,268
2024/25	828	1,268
2025/26	828	1,268
2026/27	828	1,268
2027/28	828	1,268
Total	4,140	6,340

- 7.12 It is clear that the backlog affordable housing needs within St Albans will continue to grow unless the Council takes urgent and drastic action to address needs and deliver more affordable homes.

The Future Supply of Affordable Housing

- 7.13 I have analysed the Council's latest published Five-Year Housing Land Supply ("5YHLS") trajectory which contained in the Council's 2023 Authority's Monitoring Report (**CD8.7**)
- 7.14 The Council anticipates that it has a total supply of 2,060 dwellings over the five-year period from 1 April 2023 to 31 March 2028 from the following two sources of supply:
- Permissions (estimated future completions); and
 - Windfall allowance.
- 7.15 For the purpose of this evidence, future affordable housing delivery has been calculated using those sites included in the supply which are above 15 dwellings as they are considered to qualify for affordable housing contributions.
- 7.16 I have not assumed any affordable housing delivery from the windfall allowance, since this is likely to comprise mostly smaller sites that fall below the affordable housing threshold.
- 7.17 As larger sites often deliver housing across several phases and over an extended timeframe, a 'pro-rata' estimate of affordable housing contributions for the five-year period has been applied. A full breakdown of the Council's and the Appellant's positions is available at **Appendix AG5**.
- 7.18 My analysis reveals that, based upon the Council's estimates of delivery from sites within its trajectory, there is a likely pipeline supply of 323 gross affordable homes over the next five years, equivalent to an average of just 65 affordable dwellings per annum.
- 7.19 Figure 7.3 calculates the potential shortfall over the next five years, assuming an average of 65 affordable dwellings per annum will be delivered in this period. It shows that **the existing shortfall of -2,201 dwellings will increase to -6,016 dwellings by the end of the 2027/28 monitoring period.**

Figure 7.3: Projected Affordable Housing Completions Compared with 2020 LHNA Identified Needs

Monitoring Period	Additions to AH Stock		2020 LHNA Net Affordable Housing Need per annum	Surplus / shortfall	Cumulative shortfall
	Actual (Net)	Gross Projected (Council's position)			
2020/21	173		828	-655	-665
2021/22	56		828	-772	-1,427
2022/23	54		828	-774	-2,201
2023/24		65	828	-763	-2,964
2024/25		65	828	-763	-3,727
2025/26		65	828	-763	-4,490
2026/27		65	828	-763	-5,253
2027/28		65	828	-763	-6,016
Total	608		6,624	-6,016	
Avg. Pa	73		828	-752	

Source: St Albans City and District Council Authorities Monitoring Reports (2015 to 2023); DLUHC Open Data; 2020 LHNA; and Public Access.

- 7.20 The Council's 5YHLS future supply figure derived from the analysis falls very substantially short of the 1,268 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and substantially short of the 828 net affordable housing needs per annum identified in the 2020 LHNA.

Summary and Conclusions

- 7.21 It is imperative that the -2,201 dwelling affordable housing shortfall accumulated since 2020/21 is addressed as soon as possible and in any event within the next five years.
- 7.22 When the shortfall is factored into the 2020 LHNA's identified need of 828 affordable homes per annum for the period 2023/24 and 2027/28, the number of affordable homes the Council will need to complete increases by 53% to 1,268 net affordable homes per annum over the period.
- 7.23 In respect of the supply of affordable dwellings, the evidence demonstrates that Council is unable to meet its affordable housing needs over the five-year period. The analysis shows the Council has a supply of 65 gross affordable dwellings per annum over the next five years, which will result in an accumulated shortfall of -6,016 affordable dwellings against the needs set out in the 2020 LHNA by the end of 2027/28.

7.24 Consequently, there is a substantial need for more affordable housing now. In light of the Council's poor record of affordable housing delivery and the volatility of future affordable housing delivery there can be no doubt that the provision of up to 40 affordable dwellings on this site to address the district-wide needs of St Albans should be afforded **very substantial weight** in the determination of this appeal.

Local Affordable Housing Needs and Delivery

Section 8

Introduction

- 8.1 The Government attaches weight to achieving a turnaround in affordability to help meet market and affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 8.2 As set out in Section 2, the benefit of affordable housing is a strong material consideration in support of development proposals. There are significant social and economic consequences for failing to meet affordable housing needs at both national and Local Authority level. St Albans is no exception to this.
- 8.3 This section sets out a series of facts and figures which support the Appellant's proposition that the appeal not only accords with the Development Plan in so far as the scheme will contribute to meeting identified affordable housing needs in St Albans, but will also meet identified affordable housing needs within the local area.

Local Affordable Housing Needs

- 8.4 The appeal site sits entirely within St Stephen Ward. Population estimates for 2020¹⁵ indicate that, within the ward, there were 6,664 residents.
- 8.5 The affordable housing needs of St Albans are identified in the 2016 SHMA and the 2020 LHNA. Neither of these assessments' set out what proportion of the needs identified occur within the local area. It is therefore necessary to look at other sources to understand the affordable housing needs within this locality.

Housing Register

- 8.6 The Council's FOI response (**Appendix AG1**) confirms that, as of 20 March 2024, there were 409 households who specified a preference for an affordable home in St Stephen Ward.

¹⁵ Derived from the Office for National Statistics - Population estimates - small area based by single year of age - England and Wales data.

8.7 Figure 8.1 below demonstrates average number of bids per property in St Stephen Ward over the 2022/23 monitoring period for a range of types of affordable property.

Figure 8.1: Bids Per Property in St Stephen Ward, April 2022 to March 2023

Type of Affordable Property	No. Properties Advertised	Average Bids Per Property
1-bed affordable dwelling	2	43
2-bed affordable dwelling	0	0
3-bed affordable dwelling	7	56
4+ bed affordable dwelling	0	0

Source: Freedom of Information response (18 April 2024)

8.8 Figure 8.1 demonstrates that between 1 April 2022 to 31 March 2023 there were an average of 43 bids per 1-bed affordable dwelling put up for let in the parish, and an average of 56 bids per 3 bed affordable dwelling. There were no lets for 2 or 3-bed affordable dwellings over the period in the ward.

8.9 This should be viewed in context of the fact that the Figure 8.1 also highlights that over the 2022/23 monitoring period there were **just 9 social housing lettings in the ward.**

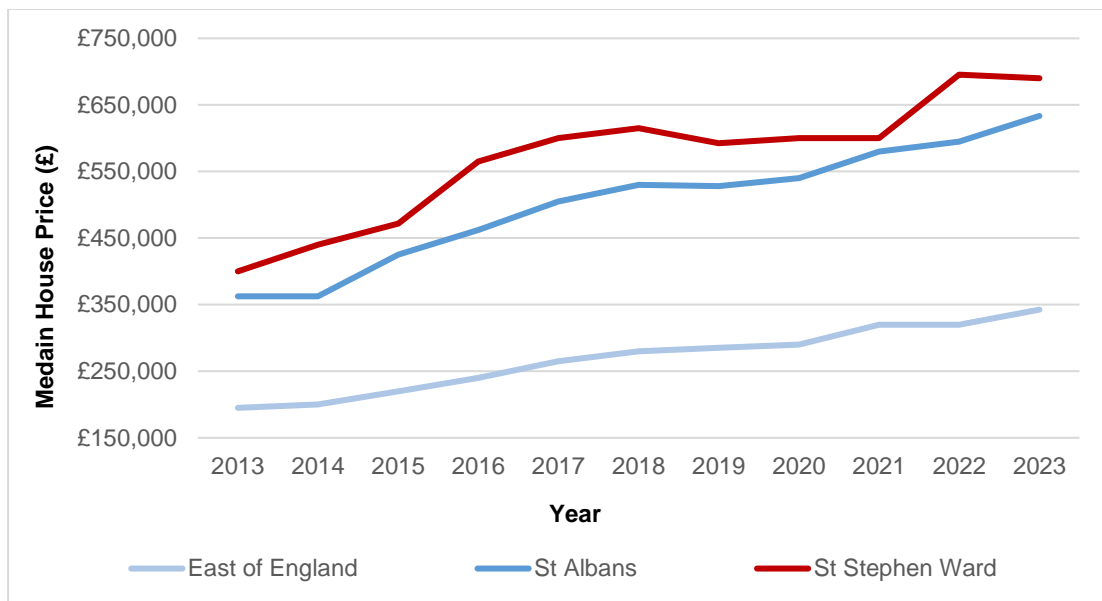
8.10 For every successful letting, there are clearly tens, if not hundreds of households who have missed out and are left waiting for an affordable home. Evidently, there is a clear and pressing need for affordable homes within the ward this is not being met.

Affordability of Market Housing

8.11 The Housing Register is only part of the equation relating to housing need. In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and, as such, are in need of affordable housing.

8.12 Figure 8.2 below compares the median house sale prices in the St Stephen Ward with St Albans and the East of England. It demonstrates that they have increased dramatically between the start of the 2016 SHMA period in 2013 and 2023.

Figure 8.2: Median House Price Comparison, 2013 to 2023

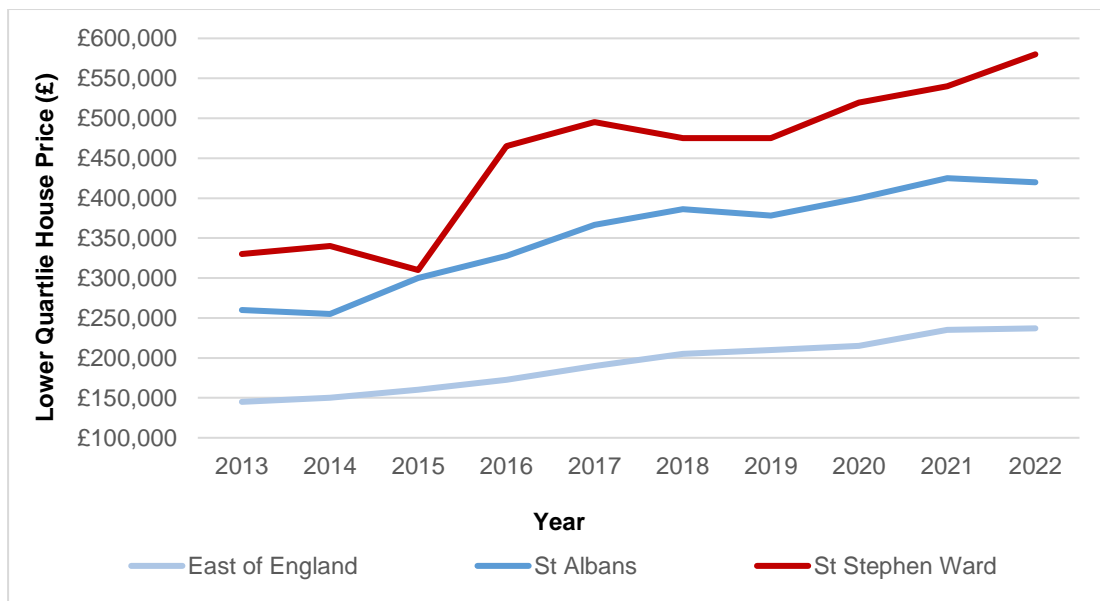


Source: ONS.

- 8.13 The median house price across St Stephen Ward has risen by 73% from £400,000 in 2013 to £690,000 in 2023. This figure is 9% higher than the St Albans figure of £633,500, (which has seen an increase of 75% over the period) and 102% higher than the East of England figure of £342,500 (which has seen an increase of 76% over the period).
- 8.14 Figure 8.3 below compares the lower quartile house sale prices in the St Stephen Ward with St Albans and the East of England. Once again it demonstrates that they have increased dramatically between the start of the 2016 SHMA period in 2013 and 2022¹⁶.

¹⁶ 2023 ONS Lower Quartile data for Wards been discontinued.

Figure 8.3: Lower Quartile House Price Comparison, 2013 to 2022



Source: ONS.

- 8.15 The lower quartile house price across St Stephen Ward has risen by 76% from £330,000 in 2013 to £580,000 in 2022. This figure is 38% higher than the St Albans figure of £420,000, (which has seen an increase of 62% over the period) and 145% higher than the East of England figure of £237,000 (which has seen an increase of 63% over the period).
- 8.16 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (**CD2.7.3, p.17, [78-79]**) in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

“78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere. In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products.”

79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. I therefore place **substantial positive weight** on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard" (my emphasis).

Affordable Housing Delivery

8.17 Figure 8.4 illustrates the gross delivery of affordable housing in St Stephen Ward since the start of the 2016 SHMA period in 2013/14.

Figure 8.4: Gross Additions to Affordable Housing Stock, 2013/14 and 2022/23

Monitoring Year	Total Housing Completions (Net)	Additions to AH Stock (Gross)	Gross AH additions as a %age of total completions
2013/14	-1	0	0%
2014/15	13	0	0%
2015/16	8	0	0%
2016/17	2	0	0%
2017/18	6	0	0%
2018/19	65	28	43%
2019/20	35	7	20%
2020/21	13	0	0%
2021/22	3	0	0%
2022/23	-3	0	0%
Total	141	35	25%
Ave. PA.	14	4	

Source: Freedom of Information response (18 April 2024)

8.18 Over the 10-year period between 2013/14 and 2022/23, there have been a total of 141 net overall housing completions and 35 gross affordable housing completions in St Stephens Ward. Losses of existing stock through the RtB are not recorded on a ward basis. The figure given above is therefore a gross figure.

- 8.19 The average affordable housing delivery in St Stephen Ward over the past 10-years should be viewed in context of the fact that as of 20 March 2024, there were 409 households who specified a preference for an affordable home in St Stephen Ward.

Future Supply of Affordable Housing

- 8.20 There are no sites included within the 5YHLS located within St Stephen that are providing affordable dwellings. As such the affordable housing needs of the ward will continue to go unmet for the foreseeable future.

Conclusions

- 8.21 The 2016 SHMA and 2020 LHNA identify the affordable housing need across St Albans. However, these assessments do not identify affordable housing need at the local level. As such, it is necessary to look at other sources of affordable housing need.
- 8.22 The Council's FOI response shows 409 households on the housing register have specified a preference for an affordable home in St Stephen Ward.
- 8.23 Between 1 April 2022 to 31 March 2023 there were an average of 43 bids per 1-bed affordable dwelling put up for let in the parish, and an average of 56 bids per 3 bed affordable dwelling. There were no lets for 2 or 3-bed affordable dwellings over the
- 8.24 This should be viewed in context of the fact that there were just 9 social housing lettings in St Stephen Ward during the 2022/23 monitoring period.
- 8.25 This section also demonstrates that both median and lower quartile house prices in St Stephen Civil Ward are higher than the figure for St Albans and significantly higher than the East of England average whilst the delivery of affordable housing in the ward is failing to keep pace with demand, with only 35 gross affordable dwellings delivered per annum since the start of 2016 SHMA period. That figure is likely to be even lower if Right to Buy losses were taken into account.
- 8.26 The Council's 5YHLS position shows that there are no sites included within the 5YHLS located within St Stephen that are providing affordable dwellings. As such, the affordable housing needs of the ward will continue to go unmet for the foreseeable future.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 9

Introduction

- 9.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 9.2 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals and there are significant social and economic consequences for failing to meet affordable housing needs at both national and Local Authority level. St Albans is no exception to this.

Benefits of the Proposed Affordable Housing

- 9.3 The affordable housing offer meets the requirements of the Affordable Housing SPG (2004) which requires 35% affordable housing. It should be noted that these policies were drafted to capture a benefit rather than to ward off or mitigate harm.
- 9.4 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD2.7.1, p.14, [72]**) in September 2018, who was clear, at paragraph 72 of the decision, that:

“... [I]n the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit” (my emphasis).

9.5 The affordable housing benefits of this appeal scheme are:

- Provision of 35% (up to 40 dwellings) of the scheme to be delivered as affordable housing;
- A deliverable scheme which provides much needed affordable homes;
- Addressing the polarised tenure profile of St Albans delivering a broader mix of tenures to provide a more balanced community and to enhance its vitality;
- With the affordable homes managed by a Registered Provider;
- Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation; and
- Greater security of tenure than the private rented sector.

9.6 These benefits are substantial and an important material consideration weighing heavily in favour of the appeal proposals.

Relevant Secretary of State and Appeal Decisions

9.7 The importance of affordable housing as a material consideration has been reflected in several Secretary of State (“SoS”) and appeal decisions.

9.8 Of particular interest is the amount of weight which has been afforded to affordable housing, relative to other material considerations, noting that many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance. A collection of such decisions can be viewed at **Appendix AG6**.

9.9 Brief summaries of appeal decisions relevant to this appeal are summarised at **Appendix AG7**. Some of the key points I would highlight from these examples are that:

- Affordable housing is an important material consideration;
- The importance of unmet need for affordable housing being met immediately;
- Planning Inspectors and the Secretary of State have attached substantial weight and very substantial weight to the provision of affordable housing; and
- Even where there is a five-year housing land supply, the benefit of a scheme’s provision of affordable housing can weigh heavily in favour of development.

Consequences of Failing to Meet Affordable Housing Needs

9.10 The consequences of failing to meet affordable housing needs in any Local Authority are significant. As set out in **Appendix AG8**, some of the main consequences of households being denied a suitable affordable home have been identified as follows:

- A lack of financial security and stability;
- Poor impacts on physical and mental health;
- Decreased social mobility;
- Negative impacts on children's education and development;
- Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour, or those with substance abuse issues;
- Being housed outside social support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increasing national housing benefit bill.

9.11 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need *now*. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

Summary and Conclusions

9.12 I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.

9.13 I agree with the Council's conclusions that very substantial weight should be afforded to the provision of affordable housing. The Council have come to this conclusion by using a 2021 appeal decision in Bullens Green, Colney Heath. However, the delivery of affordable housing and affordability in across St Albans have both worsened since this decision.

9.14 The acute level of affordable housing need in St Albans, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can.

- 9.15 In my opinion, the Council have deliberately sought to downplay the provision of up to 40 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **very substantial weight** in the determination of this appeal.

Summary and Conclusions

Section 10

Introduction

- 10.1 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 10.2 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 10.3 Market signals indicate a worsening trend in affordability across St Albans and, by any measure of affordability, this is an Authority amid an affordable housing emergency, and urgent action must be taken to deliver more affordable homes.

Affordable Housing Offer

- 10.4 **J K Rudkin Builders Limited** proposes the development of up to 115 dwellings, of which 35% (up to 40 dwellings) are to be provided on-site as affordable housing at Bricket Wood Sports and Country Club, Paintball Site and Bricket Lodge, Lye Lane, Bricket Wood, Hertfordshire.
- 10.5 This level of affordable housing provision meets the Affordable Housing Supplementary Planning Guidance (2004) requirement of 35%, which relates to Policy 7A of the Local Plan Review (1994).
- 10.6 The proposed affordable housing will be secured by way of a Section 106 Planning Obligation.

Local Policy Position

- 10.7 The adopted Development Plan for St Albans City and District Council currently comprises the St Albans District Local Plan Review (1994).
- 10.8 This Proof of Evidence clearly highlights that within adopted policy, emerging policy, and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key priority for St Albans City and District Council.

Affordable Housing Needs

- 10.9 The 2016 SHMA identified an objectively assessed need for 14,191 net affordable homes between 2013 and 2036, equivalent to an estimated annual need of 617 affordable homes across St Albans.
- 10.10 The most recent report, the 2020 LHNA, identified an objectively assessed need for 13,248 net affordable homes between 2020 and 2036, equivalent to an estimated annual need of 828 affordable homes across St Albans.
- 10.11 The Council's FOI response (**Appendix AG1**) shows that on 31 March 2023 there were 641 households on the Housing Register in St Albans. This represents a 15% increase from the previous year where the figure stood at 559 households.
- 10.12 The Help to Buy Register shows that on 27 March 2023, 776 households were seeking affordable home ownership across St Albans (**CD2.6.4**)
- 10.13 DLUHC statutory homelessness data highlights that on 31 March 2023 there were 98 households housed in temporary accommodation by St Albans City and District Council, an increase of 26% from 31 March 2022 where the figure stood at 78.
- 10.14 Of these 98 households, 67% were households with children. The Council has a responsibility to house these households.
- 10.15 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 189 households in need of homelessness prevention duty, and a further 193 households in need of relief duty from the Council.

Affordable Housing Delivery

- 10.16 In the ten-year period since the start of the 2016 SHMA period in 2013/14 net affordable housing delivery represented only 14% of overall housing delivery, equating to just 56 affordable dwellings per annum.
- 10.17 A shortfall of -5,615 affordable dwellings has arisen against the needs identified in the 2016 SHMA, which estimated a need for 617 affordable dwellings per annum between 2013 and 2036.
- 10.18 Against the most recent assessment of affordable housing need in St Albans, a shortfall of -2,201 affordable dwellings has arisen in the first three years of the 2020 LHNA period, which estimated a need 828 affordable dwellings per annum between 2020 and 2036.

10.19 Given the recognised shortfalls in affordable housing delivery across St Albans, the appeal proposals provide an affordable housing contribution which would contribute significantly towards addressing this key corporate priority.

Affordability

10.20 In addition to the persistent shortfall in affordable housing delivery against objectively assessed needs other indicators further point to an affordability crisis in St Albans. Set out below are the key findings in respect of affordability across the District:

Private Rental Market

- A median private rent of £1,313 pcm in 2022/23 is 46% higher than the East of England figure of £900 pcm and 59% higher than the national figure of £825 pcm.
- A lower quartile rent of £1,050 pcm in 2022/23 is 43% higher than the East of England figure of £735 pcm and 68% higher than the national figure of £625 pcm.
- Median rents for new tenancies in St Albans across all property types surpass the median private rent of £1,313 per calendar pcm in 2022/23.
- The rent differentials are striking, with 1-bedroom properties at 5% higher, 2-bedroom properties at 27% higher, 3-bedroom properties at 86% higher, 4-bedroom properties at 150% higher, and 5-bedroom properties at 220% higher.

Median House Prices

- A ratio of 18.44 in St Albans stands substantially above the national median of 8.28 (+123%) and significantly above the East of England median of 10.08 (+83%).
- St Albans has the highest median house price to income ratio across all 45 Local Authorities in the East of England region. An affordability ratio of 18.44 in St Albans is 19% higher than the figure of 15.48 for Epping Forest which ranks second in the region.
- The median house price across St Albans has risen by 75% from £362,500 in 2013 to £633,500 in 2023. This figure is some 118% higher than the national figure of £290,000, which has seen an increase of 57% over the same period and 85% higher than the East of England figure of £342,500 which has seen an increase of 76% over the same period. It should also be noted that since the start of the 2020 LHNA period median house prices in 2020 have increased by 17%.

Lower Quartile House Prices

- A lower quartile ratio of 16.53 in St Albans stands substantially above the national average 7.37 (+224%) and significantly above the East of England average of 9.9 (+167%).
- St Albans has the highest lower quartile house price to income ratio across all 45 Local Authorities in the East of England region and shows no sign of improvement since 2013 with an increase of 25% over this period.
- It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 267% higher than that.
- In 2023 lower quartile house prices in St Albans (£435,000) were 74% higher than across the East of England (£250,000) and 129% higher than the national figure (£190,000). It should also be noted that since the start of the 2020 LHNA period median rents in 2020 have increased by 9%.

10.21 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in St Albans.

10.22 This demonstrates an acute need for affordable housing in St Albans and one which the Council and decision takers need to do as much as possible to address as required to do so, proactively, by the NPPF (2023).

Future Supply of Affordable Housing

10.23 It is imperative that the -2,201 dwelling affordable housing shortfall accumulated since 2020/21 is addressed as soon as possible and in any event within the next five years.

10.24 When the shortfall is factored into the 2020 LHNA's identified need of 828 affordable homes per annum for the period 2023/24 and 2027/28, the number of affordable homes the Council will need to complete increases by 53% to 1,268 net affordable homes per annum over the period.

10.25 In respect of the supply of affordable dwellings, the evidence demonstrates that Council is unable to meet its affordable housing needs over the five-year period. The analysis shows the Council has a supply of 65 gross affordable dwellings per annum over the next five years, which will result in an accumulated shortfall of -6,016 affordable dwellings against the needs set out in the 2020 LHNA by the end of 2027/28.

Local Affordable Housing Needs and Delivery

- 10.26 The affordable housing needs of St Albans are identified in the 2016 SHMA and the 2020 LHNA. Neither of these assessments set out what proportion of the needs identified occur within the local area. It is therefore necessary to look at other sources to understand the affordable housing needs within this locality.
- 10.27 The Council's FOI response (**Appendix AG1**) confirms that, as of 20 March 2024, there were 409 households who specified a preference for an affordable home in St Stephen Ward. The FOI response also highlights that over the 2022/23 monitoring period there were just 9 social housing lettings in St Stephen Ward.
- 10.28 The median house price across St Stephen Ward has risen by 73% from £400,00 in 2013 to £690,000 in 2023. This figure is 8.5% higher than the St Albans figure of £633,500, (which has seen an increase of 75% over the period) and 102% higher than the East of England figure of £342,500 (which has seen an increase of 76% over the period).
- 10.29 The lower quartile house price across St Stephen Ward has risen by 76% from £330,000 in 2013 to £580,000 in 2022. This figure is 38% higher than the St Albans figure of £420,000, (which has seen an increase of 62% over the period) and 145% higher than the East of England figure of £237,000 (which has seen an increase of 63% over the period).
- 10.30 Over the 10-year period between 2013/14 and 2022/23, there have been a total of 141 net overall housing completions and 35 gross affordable housing completions in St Stephens Ward. Losses of existing stock through the RtB are not recorded on a ward basis. The figure is therefore a gross figure.
- 10.31 There are no sites included within the 5YHLS located within St Stephen that are providing affordable dwellings. As such the affordable housing needs of the ward will continue to go unmet for the foreseeable future.

Summary and Conclusions

- 10.32 There are serious and persistent affordability challenges across St Albans. This is exemplified by the affordability indicators which show a poor and worsening affordability across the District.
- 10.33 It is my opinion that there is an acute housing crisis in St Albans, with a lower quartile house price to income ratio of 16.53. Mortgage lending is typically offered on the basis

of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 267% higher than that.

10.34 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.

10.35 Considering the Authority's past poor record of affordable housing delivery and worsening affordability indicators at both the District and local level, it is my view that the provision of up to 40 affordable dwellings on this site should be afforded **very substantial weight** in the determination of this appeal.