

Summary 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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Introduction

Section 1

- 1.1 My name is **Annie Gingell** and 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).
- 1.2 I am a member of the Royal Town Planning Institute. 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 and have been in private practice since 2017. I have been employed at Tetlow King Planning Ltd for the past 7 years.
- 1.3 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").
 - 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.
- 1.4 My Proof of Evidence examines the affordable housing need in St Albans and considers the weight to be attributed to affordable housing in the overall planning balance.
- 1.5 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** of my main Proof of Evidence.

- 1.6 There is an acute need for more affordable homes to be delivered in St Albans which the appeal proposals would make a substantial contribution towards addressing.

Affordable Housing Evidence

Section 2

Introduction

- 2.1 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.
- 2.2 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.
- 2.3 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

- 2.4 **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.
- 2.5 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).
- 2.6 The proposed affordable housing will be secured by way of a Section 106 Planning Obligation.

Local Policy Position

- 2.7 The adopted Development Plan for St Albans City and District Council currently comprises the St Albans District Local Plan Review (1994).
- 2.8 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

- 2.9 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.
- 2.10 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.
- 2.11 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.
- 2.12 The Help to Buy Register shows that on 27 March 2023, 776 households were seeking affordable home ownership across St Albans (**CD2.6.4**)
- 2.13 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.
- 2.14 Of these 98 households, 67% were households with children. The Council has a responsibility to house these households.
- 2.15 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

- 2.16 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.
- 2.17 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.
- 2.18 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.

- 2.19 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

- 2.20 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%.

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

2.22 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

2.23 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.

2.24 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.

2.25 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

- 2.26 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.
- 2.27 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.
- 2.28 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).
- 2.29 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).
- 2.30 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.
- 2.31 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

- 2.32 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.

- 2.33 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.
- 2.34 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.
- 2.35 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.