

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

St Stephens Green Farm, Chiswell Green Lane, St
Albans, Hertfordshire

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Outline application (access sought) for demolition of existing buildings, and the building of up to 330 discounted affordable homes for Key Workers, including military personnel, the creation of open space and the construction of new accesses and highway

St Stephens Green Farm, Chiswell Green Lane, St Albans, Hertfordshire

Mr S Collins, Headlands Way Limited

March 2023

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TETLOW KING PLANNING
UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL, BS16 5EL
Tel: 0117 9561916 Email: all@tetlow-king.co.uk

www.tetlow-king.co.uk

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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 6 years.
- 1.3 The Proof of Evidence examines affordable housing needs and delivery across St Albans and considers the weight to be attributed to affordable housing provision at the appeal site in the overall planning balance.
- 1.4 There is an acute need for more affordable homes to be delivered across St Albans District which the appeal proposals would make a very substantial contribution towards addressing.

Affordable Housing Evidence

Section 2

- 2.1 My Proof of Evidence deals specifically with affordable housing needs and delivery and my consideration of the degree of weight¹ which I believe should be applied in the context of the acute need and the poor level of affordable housing that has been delivered in St Albans.
- 2.2 There is irrefutable evidence of an acute national housing crisis. On a national level, in every scenario, against every annual need figure identified since the publication of the Barker Review in 2004, the extent of the shortfall in housing delivery in England is staggering and ranges from a shortfall of -1,082,847 to a shortfall of -2,702,847 homes over the past 18 monitoring years depending on which annual target actual housing completions are measured against.
- 2.3 However, the true picture is that since 1969 the scale of the shortfall is over 5.5 million homes have not been provided. Not once in the last 50 years has the country built more than 300,000 homes.

Key Findings

Affordable Housing Offer

- 2.4 The Appellant, Mr S Collins, Headlands Way Limited, proposes the development of 330 dwellings, of which 100% are proposed as affordable homes at St Stephens Green Farm, Chiswell Green Lane, St Albans, Hertfordshire.
- 2.5 The tenure split of the affordable housing offer will comprise a mix of First Homes, Shared Ownership dwellings, and Discount Market Sale properties (all discounted by at least a third of open market value) which will be secured through a Section 106 agreement.
- 2.6 The appeal proposals comprise the only site within St Albans to date that exclusively seeks to meet the affordable housing needs of key workers.

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

National Policy Position

- 2.7 The NPPF sets out, at paragraph 62, that the type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Paragraph 63 is clear that: *“Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required”*.
- 2.8 The NPPF is clear that any household whose housing needs, either to buy or rent, that are not met by the market are considered to be in need of affordable housing products.
- 2.9 Within the context of the appeal proposals, this means any key worker households unable to buy a home on the open market in St Albans. Despite the Council’s assertions to the contrary, there is nothing in the NPPF or the PPG that ranks one form of affordable housing above another.

Local Policy Position

- 2.10 The Development Plan for St Albans City and District Council comprises the St Albans District Local Plan Review (1994); and the St Stephen Neighbourhood Plan (2022).
- 2.11 Unfortunately, despite a clear requirement in national policy the Council’s adopted/ emerging development plan and associated evidence bases are silent on the needs of key workers. This is in spite of the fact that the only category of persons specifically identified in the NPPF definition of “affordable housing” is “essential local workers”.

Affordable Housing Needs

- 2.12 There is a significant need for affordable homes in St Albans with the 2016 SHMA identifying an objectively assessed need for 14,191 net affordable homes between 2013 and 2036, equivalent to an estimated annual need of 617 affordable homes in St Albans
- 2.13 The most recent assessment, 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 in St Albans, with almost half of those needs being for affordable home ownership.
- 2.14 Crucially, neither of the above needs assessments provide a specific need figure for key worker affordable homes across the St Albans Local Authority, despite the fact that paragraph 63 of the NPPF requires them to do so. The appeal proposal seeks to directly meet the needs of Key Workers, with appropriate controls set out in the accompanying Section 106 agreement.

- 2.15 As such, the exact need for this type of affordable accommodation over this period has not been definitively established. This is a serious omission in the Council's evidence base and means that Council are not properly looking to provide the needs of those people who require such provision into the future, a section of need I describe as the "hidden middle".

Affordable Housing Delivery

- 2.16 In the nine-year period since the start of the 2016 SHMA period in 2013/14 net of Right to Buy affordable housing delivery represented just 13% of overall housing delivery, equating to just 55 affordable dwellings per annum.
- 2.17 Since the start of the 2016 SHMA period in 2013/14, a shortfall of -5,056 affordable dwellings has arisen over the nine-year period, equivalent to an average annual shortfall of -562 affordable dwellings. Put another way, 91% households in need of an affordable home were let down by the Council's inability to deliver.
- 2.18 In the first two years of the 2020 LHNA period between 2020/21 and 2021/22, affordable housing completions (net of Right to Buy) have averaged just 114 affordable dwellings per annum, against a need of 828 net affordable dwellings per annum.
- 2.19 A shortfall of -1,428 affordable dwellings has arisen in the first two years of the 2020 LHNA period, equivalent to -714 per annum. This means that just 14% of identified affordable housing needs were met.
- 2.20 Additionally, a shortfall of -712 affordable home ownership dwellings has arisen in the first two years of the 2020 LHNA period, equivalent to -356 per annum. It is likely that this shortfall would increase if demolitions over the period were to be accounted for in the figures. It should also be noted that none of the dwellings delivered were exclusively for key workers.
- 2.21 It is clear that a 'step change' in affordable housing delivery is needed now in St Albans District to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.

Affordability

- 2.22 In addition to the current shortfalls in delivery against the objectively assessed needs for affordable housing identified in the 2016 SHMA and 2020 LHNA, other indicators further point to an affordability crisis in the district.

2.23 Set out below are the key findings in respect of affordability across St Albans:

House Prices

- The ratio of median house prices to median incomes in St Albans now stands at 17.32, a 24% increase since the start of the 2016 SHMA period in 2013 where it stood at 13.92.
- A median ratio of 17.32 in St Albans stands significantly above the East of England average of 10.53 (+64%) and substantially above the national average of 9.05 (+91%).
- The median house price across the St Stephen Ward has risen by 75% from £400,000 in 2013 to £700,000 in 2022. This compares to a 63% (£362,500 to £590,000) increase across St Albans.
- In 2022, median house prices in the ward (£700,000) were 19% higher than across the St Albans (£590,000); 120% higher than across the East of England (£318,275); and 159% higher than the national figure (£270,000).
- The ratio of lower quartile house price to incomes in St Albans now stands at 17.69, a 34% increase since the start of the 2016 SHMA period in 2013 when it stood at 13.23.
- A lower quartile ratio of 17.69 in St Albans stands significantly above the East of England average of 10.40 (+70%), and over double the national average of 8.04 (+120%).
- The lower quartile house price across St Stephen Ward has risen by 78% from £330,000 in 2013 to £580,000 in 2022. This compares to a 60% (£260,000 to £415,000) increase across St Albans;
- In 2022, lower quartile house prices in St Stephen Ward (£580,000) were 40% higher than across the St Albans (£415,000); 147% higher than across the East of England (£235,000); and 222% higher than the national figure (£180,000).

Help to Buy Register

- As of 27 February 2023, 768 households are seeking a shared ownership home in St Albans.
- This is clearly a significant proportion of those seeking assistance with their housing.

Private Rents

- In 2021/22 median private rents in St Albans stood at £1,250 pcm. This represents a 25% increase from 2013/14 (start of the 2016 SHMA period) where median private rents stood at £998 pcm.
- A median private rent of £1,250 pcm in 2021/22 is 45% higher than the East of England figure of £865 pcm and 57% higher than the national figure of £795pcm.
- The average lower quartile monthly rent in St Albans in 2021/22 was £995 pcm. This represents a 21% increase from 2013/14 where average lower quartile monthly rents stood at £825 pcm.
- A lower quartile rent of £995 pcm in 2021/22 is 42% higher than the East of England figure of £700 pcm and 67% higher than the national figure of £595 pcm.

Tenure Profile

- At the time of the Census 2021, owner occupation was by far the most common tenure in St Albans (70.9%) and St Stephen Ward (83.5%).
- Owner occupation is therefore much more prevalent at Ward level than at the District level as well as at the regional (65.2%) and national levels (61.3%).
- Shared ownership properties are by far the most uncommon, representing just 0.5% at District level (297 dwellings). Worse still, there were just 19 shared ownership dwellings in the ward equal to 1.3% of stock.
- Over the ten year period between 2011 Census and the 2021 Census the Council has added just 36 shared ownership units to its dwelling stock, four of which were in the ward.

Council Tax Bands

- In St Albans, just 1% of properties are in Council Tax Band A (the lowest band) and just 5% of properties are in Council Tax Band B.
- By comparison, 14% of properties across the East of England are in Council Tax Band A, and 21% of properties are in Council Tax Band B; and nationally 24% of properties are in Council Tax Band A, and 20% of properties are in Council Tax Band B.

- 2.24 All these factors combine to create a very challenging situation for any key worker in need of affordable housing to rent or to buy in St Stephen as well as across St Albans more generally.
- 2.25 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 seek to address as required to do so, proactively, by the NPPF (2021).

Key Worker Affordable Housing Needs

- 2.26 The evidence clearly demonstrates that the majority of key worker households do not earn enough to be able to purchase a property on the open housing market. It also demonstrates that the majority of key worker households earn too much to be eligible for social / affordable rented housing.
- 2.27 These people represent the hidden middle whose needs have largely been forgotten about by the Council. It is estimated that within the St Albans Local Authority area alone there are as many as 27,089 key workers falling within this gap. This demographic of people clearly makes up a significant proportion of the population for the area.
- 2.28 Against the scale of unmet need and the lack of suitable alternatives in St Albans, there is no doubt in my mind that the provision of up to 330 affordable homes will make a substantial contribution to addressing the issues facing key workers in the district and Hertfordshire more widely.

Weight to be Attributed to the Proposed Affordable Housing Provision

- 2.29 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.
- 2.30 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.
- 2.31 Market signals indicate a worsening trend in affordability for key workers across St Albans and by any measure of affordability, this is an authority amid an affordable housing emergency, and one through which urgent action must be taken to deliver more affordable homes.

2.32 Against the scale of unmet need and the lack of suitable alternatives for key worker households in St Albans, there is no doubt in my mind that the provision of up to 330 affordable homes will make a substantial contribution. Considering all the evidence I consider that it should be afforded **very substantial weight** in the determination of this appeal.