

TOWN AND COUNTRY PLANNING ACT 1990

**AFFORDABLE HOUSING STATEMENT OF COMMON
GROUND IN RESPECT OF AFFORDABLE NEEDS
AND DELIVERY ACROSS THE ST ALBANS CITY AND
DISTRICT COUNCIL ADMINISTRATIVE AREA**

SECTION 78 APPEAL

**Outline application for up to 45 dwellings, including
new affordable homes, with areas of landscaping and
public open space, including points of access, and
associated infrastructure works.**

**Land To The Rear Of 96 to 106 High Street, Colney
Heath, St Albans, Hertfordshire**

**On behalf of: Tarmac Ltd and St Albans City and
District Council**

March 2024

PINS REF: APP/B1930/W/23/3333685

LPA REF: 5/2022/0599

Appendices

Appendix AH1 Help to Buy Register (27 March 2023)

Appendix AH2 Freedom of Information Response (11 May 2023)

Appendix AH3 Affordable Housing Future Supply

1.0 Affordable Housing Offer

- 1.1 The appeal proposals seek outline permission for up to 45 dwellings, of which 40% are proposed as affordable homes equivalent to up to 18 affordable homes.
- 1.2 This level of affordable housing provision exceeds the Affordable Housing Supplementary Planning Guidance (2004) minimum requirement of 35% which relates to Policy 7A of the Local Plan Review (1994); and meets the requirements of emerging Policy HOU2 of the emerging Local Plan 2041 (Regulation 18) which requires 40% affordable housing provision from qualifying sites.
- 1.3 The proposed tenure split has yet to be finalised by the Appellant and Council.
- 1.4 The proposed affordable housing will be secured by way of a Section 106 planning obligation.

2.0 Affordable Housing Policy

- 2.1 Policy 7A of the Local Plan states that the Council will seek to negotiate an element of affordable housing on sites over 0.4ha and on sites under this size where 15 or more dwellings are proposed. It is agreed this Policy is specific to sites contained within Towns and Specified Settlements as defined in Policy 2, which does not include Colney Heath and accordingly does not apply to the appeal scheme/site.
- 2.2 Paragraph 1.11 of the Affordable Housing Supplementary Planning Guidance ("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."
- 2.3 Paragraph 7.13 of the Affordable Housing SPG (2004) states:

“The Council will seek, by negotiation, a target level of 35% affordable units on suitable sites above the site size thresholds.”

2.4 The SPG states at paragraph 7.10 that the Council is applying the threshold of Circular 6/98, that being affordable housing is required on all sites of 1ha or more, or of 25+ dwellings, the Council will seek an on-site affordable housing provision equivalent to 35% of dwellings on the site. However, Circular 6/98 is no longer relevant and SADC 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.

2.5 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)” (emphasis added).

2.6 Annex 2 of the 2023 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*”.

2.7 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. Draft Policy HOU2 (Affordable Housing) 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. The draft Local Plan is afforded limited weight given its early stage of preparation.

3.0 Affordable Housing Needs

South West Hertfordshire Strategic Housing Market Assessment (2016) – CD10.1

3.1 The South West Hertfordshire Strategic Housing Market Assessment (“2016 SHMA”) was published in January 2016 and covers the 23 year period 2013 to 2036.

3.2 Table 39, on page 112, identifies the affordable housing need in St Albans to be 617 net dwellings per annum, when using the Liverpool approach, equivalent to a total need of 14,191 net affordable dwellings over the 23 year period.

3.3 Table 43, on page 120, sets out estimated level of affordable housing need per annum by tenure type. It identifies a net need for 102 intermediate affordable properties and 515 social/affordable rented properties per annum in St Albans.

South West Hertfordshire Local Housing Need Assessment (2020) – CD10.2

- 3.4 The South West Hertfordshire Local Housing Need Assessment (“2020 LHNA”) was published in September 2020 and covers 16 year period from 2020 to 2036.
- 3.5 Table 37 on page 89 identifies a net need for 443 net affordable/social rented affordable dwellings per annum, when using the Liverpool approach, equivalent to a total need of 7,088 net affordable dwellings over the 16 year period.
- 3.6 Table 42 on page 97 identifies a need for 385 net affordable home ownership dwellings per annum, equivalent to a total need of 6,160 net affordable dwellings over the 16 year period.
- 3.7 In total therefore, there is an objectively assessed need for 828 affordable dwellings per annum in St Albans, equivalent to a total need of 13,248 net affordable dwellings over the 16 year period.

Local Housing Need vs Affordable Housing Need

- 3.8 The Council’s 2023 Authority’s Monitoring Report (**CD10.11**) sets out that the Council’s overall housing need for the period 2023/24 to 2027/28 is being calculated using a figure based on the Government’s Standard Methodology for assessing Local Housing Need.
- 3.9 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**”¹ (emphasis added).*
- 3.10 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).

¹ Paragraph: 006 Reference ID: 2a-006-20190220

- 3.11 This is further supported by the fact that calculating such need for an authority is dealt with under a separate section of the PPG titled '*How is the total annual need for affordable housing calculated?*' which clearly sets out that:

"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 period²."

- 3.12 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.

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.

Help to Buy Register

- 3.13 The Help to Buy Register (**Appendix AH1**) shows that on 27 March 2023, 776 households were seeking affordable home ownership across St Albans.

Housing Register

- 3.14 The Councils FOI response (**Appendix AH2**) shows that on 31 March 2023 there were 641 households on the Housing Register in St Albans.

Temporary Accommodation

- 3.15 Department of Levelling Up Homes and Communities ("DLUHC") statutory homelessness data highlights that on 31 March 2023 there were 98 households housed in temporary accommodation by the Council.

Homelessness

- 3.16 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

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

homelessness prevention duty³, and a further 193 households in need of relief duty⁴ from the Council.

4.0 Net of Demolitions Additions to Affordable Housing Stock

4.1 Figure 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 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)

4.2 Figure 1 demonstrates that between 2013/14 and 2022/23, a total of 4,101 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.

³ 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.

⁴ 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.

5.0 Net Additions to Affordable Housing Stock

- 5.1 Figure 2 below calculates the affordable housing delivery per annum since the start of the 2016 SHMA period in 2013/14, net of Right to Buy sales and acquisitions.

Figure 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

5.2 Figure 2 demonstrates that, between 2013/14 and 2022/23, the Council has added 555 net affordable dwellings, equivalent to 56 per annum. This equates to 14% net affordable housing delivery.

5.3 Figure 3 illustrates the gross delivery of affordable housing in Colney Heath since the start of the 2016 SHMA period in 2013/14.

Figure 3: 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	-19	0	0%
2014/15	22	16	73%
2015/16	0	0	0%
2016/17	24	8	33%
2017/18	3	0	0%
2018/19	5	0	0%
2019/20	51	0	0%
2020/21	93	62	67%
2021/22	106	44	42%
2022/23	152	26	17%
Total	437	156	36%
Ave. PA.	44	16	

Source: St Albans City and District Council Authorities Monitoring Reports (2014 to 2023)

5.4 Over the 10-year period between 2013/14 and 2022/23, there have been a total of 437 net overall housing completions and 156 gross affordable housing completions in Colney Heath. Losses existing stock through the RtB are not recorded on a parish basis. The figure given above is therefore a gross figure.

6.0 Affordable Housing Delivery Compared to Objectively Assessed Needs

6.1 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 4 that there has been an accumulated shortfall in the delivery of affordable housing of some -5,640 affordable homes against an identified need for 6,179 over the ten-year period.

Figure 4: 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	-56		

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

- 6.2 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.
- 6.3 Figure 5 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: 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)	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 Data; and 2020 LHNA.

6.4 Since the start of the 2020 LHNA period in 2020/21, affordable housing completions have averaged 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.

7.0 Addressing the Shortfall in Affordable Housing Delivery

7.1 The Appellants consider that any shortfall in delivery should be dealt with within the next five years. This is also an approach set out within the PPG⁵ and endorsed at appeal (see **CD14.35, p.16 [85-86]** and **CD14.6, p.12, [53]**).

7.2 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.

7.3 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.

⁵ Paragraph: 031 Reference ID: 68-031-20190722

8.0 Future Supply of Affordable Housing

- 8.1 The Council's latest published Four Year Housing Land Supply ("4YHLS") trajectory is contained in the Council's 2023 Authority's Monitoring Report (**CD10.11**)
- 8.2 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.
- 8.3 For the purpose of this Statement, the calculations with regard to future affordable housing delivery have been calculated using the sites included in the supply above 15 dwellings as they are considered to qualify for affordable housing contributions.
- 8.4 The calculations do not assume any affordable housing delivery from the windfall allowance since this is likely to comprise mostly smaller sites that fall below the affordable housing threshold.
- 8.5 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 and the Appellants positions is available at **Appendix AH3**.

Council's Position

- 8.6 The 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 65 affordable dwellings per annum.
- 8.7 Figure 6 calculates the potential shortfall over the next five years, assuming an average of 57 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 6: 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	-655
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.

8.8 The Council's 5YHLS future supply figure derived from the analysis falls 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 short of the 828 net affordable housing needs per annum identified in the 2020 LHNA.

Appellant's Position

8.9 The Appellant considers the Council's housing land supply is considerably lower than the 2,060 dwellings claimed.

8.10 The Appellant's position is that the deliverable housing land supply stands at 1,623 dwellings, some 447 dwellings fewer than the Council's position. In reaching these conclusions, 107 discounts projected completions from three sites in the trajectory and 340 dwellings from the windfall allowance.

8.11 Based upon the Appellants findings, there is a likely pipeline supply of 296 gross affordable homes over the next five years, equivalent to an average of 59 affordable dwellings per annum.

8.12 Figure 7 calculates the potential shortfall over the next five years, assuming an average of 52 gross affordable dwellings per annum will be delivered in this period. It shows

that the existing shortfall of -2,201 dwellings will increase to -6,046 dwellings by the end of the 2027/28 monitoring period

Figure 7: 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 (Appellant's position)			
2020/21	173		828	-655	-655
2021/22	56		828	-772	-1,427
2022/23	54		828	-774	-2,201
2023/24		59	828	-769	-2,970
2024/25		59	828	-769	-3,739
2025/26		59	828	-769	-4,508
2026/27		59	828	-769	-5,277
2027/28		59	828	-769	-6,046
Total	578		6,624	-6,046	
Avg. Pa	72		828	-756	

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

8.13 The Appellants 5YHLS future supply figure derived from the analysis falls 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 falls short of the 828 net affordable housing needs per annum identified in the 2020 LHNA.

9.0 Affordability Indicators

9.1 The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in St Albans for any household seeking an affordable home:

Private Rental Market

- 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
- 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.

- 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.
- 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 House Prices

- 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 above the national median of 8.28 (+123%) and the East of England median of 10.08 (+83%).
- 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.
- 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).
- The median house price across Colney Heath Ward has risen by 80% from £375,000 in 2013 to £675,000 in 2023. This figure is 7% higher than the St Albans figure of £633,500, and 97% higher than the East of England figure of £342,000.

Lower Quartile House Prices

- 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 where it stood at 13.23.
- A ratio of 16.53 in St Albans stands above the national average of 7.37 (+124%) and above the Region average of 9.90 (+67%).
- 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.

- 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).
- The lower quartile house price across Colney Heath Ward has risen by 64% from £290,000 in 2013 to £475,000 in 2022. This figure is 31% higher than the St Albans figure of £420,000, and 100% higher than the East of England figure of £237,000.

10.0 Agreement of the Parties

- 10.1 The parties agree that 40% affordable housing provision at the appeal site exceeds the Affordable Housing Supplementary Planning Guidance (2004) minimum requirement of 35% which relates to Policy 7A of the Local Plan Review (1994); and meets the requirements of emerging Policy HOU2 of the emerging Local Plan 2041 (Regulation 18) which requires 40% affordable housing provision from qualifying sites.
- 10.2 The parties agree that the 2016 SHMA identifies an affordable housing need of 617 net dwellings per annum for the period 2013 to 2036 across St Albans, when using the Liverpool approach, broken down as 102 intermediate affordable properties and 515 social/affordable rented properties per annum.
- 10.3 The parties agree that the 2020 LHNA identifies an affordable housing need of 828 net dwellings per annum for the period 2020 to 2036 across St Albans, when using the Liverpool approach, broken down as 385 affordable home ownership affordable properties and 443 social/affordable rented properties per annum.
- 10.4 The parties agree that the Standard Method calculation of Local Housing Need does not provide an annual need figure for affordable housing in line with the PPG nor does it monitor affordable housing supply.
- 10.5 The parties agree that the Help to Buy Register shows that on 27 March 2023, 776 households were seeking affordable home ownership across St Albans.
- 10.6 The parties agree the Councils FOI response shows that on 31 March 2023 there were 641 households on the Housing Register in St Albans.
- 10.7 The parties agree that DLUHC statutory homelessness data highlights that on 31 March 2023 there were 98 households housed in temporary accommodation by the Council.

- 10.8 The parties agree that 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.
- 10.9 The parties agree between 2013/14 and 2022/23, a total of 4,101 net dwellings were delivered across St Albans, equivalent to 410 per annum. Of these, 711 dwellings were affordable tenures (net of demolitions), equivalent to 71 per annum. This equates to 17% affordable housing delivery.
- 10.10 The parties agree that between 2013/14 and 2022/23, St Albans has added 56 affordable dwellings per annum net of Right to Buy sales and acquisitions, equivalent to 14% of the total average number of net housing completions.
- 10.11 The parties agree that between 2013/14 and 2022/23, there have been a total of 437 net dwellings were delivered in Colney Heath, equivalent to 44 per annum. Of these, 156 gross dwellings were affordable tenures, equivalent to 16 per annum. This equates to 36% affordable housing delivery.
- 10.12 The parties agree that since the start of the 2016 SHMA period in 2013/14, shortfall of -5,615 affordable dwellings has arisen, equivalent to an average annual shortfall of -562 affordable dwellings.
- 10.13 The parties agree that since the start of the 2020 LHNA period in 2020/21, a shortfall of -2,201 affordable dwellings has arisen, equivalent to average annual shortfall of -743 per annum.
- 10.14 The parties agree that the council's estimated supply of affordable dwellings for the period 1 April 2023 to 31 March 2028 is 65 gross affordable dwellings per annum.
- 10.15 The parties agree that the appellants estimated supply of affordable dwellings for the period 1 April 2023 to 31 March 2028 is 59 gross affordable dwellings per annum.
- 10.16 The parties agree that the both the council and the appellants estimated supply of affordable dwellings for the period 1 April 2023 to 31 March 2028 falls short of the 828 affordable dwellings per annum required by the 2020 LHNA.
- 10.17 The parties agree that the both the council and the appellants supply of affordable dwellings for the period 1 April 2023 to 31 March 2028 falls 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.

- 10.18 The parties agree that the affordability indicators cited at paragraph 9.1 of this Statement indicate that housing is becoming less affordable in St Albans and Colney Heath.
- 10.19 The parties agree there is an acute national housing crisis.
- 10.20 The parties agree there is an acute need for affordable housing across St Albans and annual needs are far greater than what has been provided to date.
- 10.21 The parties agree that there remains a pressing need for affordable housing in the district that the appeal scheme would help address.
- 10.22 The parties agree that there is no reason why that affordable housing should not be located in Colney Heath; indeed the development plan encourages the provision of affordable housing on-site as part of market housing led schemes
- 10.23 The Council accepts that the benefits arising from providing affordable housing accords with the sustainable development definition in NPPF and the provision of the much-needed affordable housing, to deal with the identified need, is a considerable benefit weighing in favour of the development.
- 10.24 The parties agree that the provision of up to 18 affordable units at the appeal site is a material consideration weighing in favour of the appeal, which should be afforded **very substantial weight** in the overall planning balance.
- 10.25 It is agreed that when the -2,201 dwelling affordable housing shortfall which has accumulated since 2020/21 is factored into the 2020 LHNAs identified need of 828 affordable homes per annum for the period 2020/21 to 2035/36, the number of affordable homes the Council will need to complete increases to 1,268 net affordable homes per annum for the period 2023/24 to 2027/28.

Signed on behalf of the LPA:

Signature:



Name: Nabeel Kasmani

Date: 19 March 2024

Signed on behalf of the Appellant:

Signature:



Name: Annie Gingell

Date: 19 March 2024