

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

Land to the rear of 42-100 Tollgate Road, Colney Heath,
St Albans, Hertfordshire

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Outline application (access sought) – Demolition of existing house and stables and the construction of up to 150 dwellings including affordable and self-build and custom-build dwellings together with all ancillary works.

Land to the rear of 42-100 Tollgate Road, Colney Heath, St Albans, Hertfordshire,
AL4 0PY

Vistry Homes Limited

August 2023

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CD6.1	Committee Report (25 May 2023)
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Appeal Documents	
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CD8.1	Affordable Housing Statement of Common Ground (15 August 2023)
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Adopted/ Emerging Development Plan	
CD2.1	St Albans District Local Plan Review (1994)
CD2.4	St Albans City and District Council Affordable Housing Supplementary Planning Guidance (2004)
CD3.1	St Albans Emerging Local Plan 2041 (Regulation 18)
Evidence Base	
CD10.1	South West Hertfordshire Strategic Housing Market Assessment (January 2016)
CD10.2	South West Hertfordshire Local Housing Need Assessment (September 2020)
Other Relevant Documents	
CD10.3	St Albans City and District Council Authority's Monitoring Report (February 2022)
CD10.4	St Albans City and District Council Housing Strategy 2023-2026
CD10.5	St Albans City and District Council Homelessness Strategy 2022-2025
CD10.6	St Albans City and District Council Corporate Plan 2021-2026
CD10.7	Government consultation - Use of receipts from Right to Buy Sales (August 2018)
CD10.8	St Albans City and District Council Allocations Policy (December 2021)
Relevant Appeal Decisions	
CD14.6	Appeal Decision - Land off Bullens Green Lane, Colney Heath (June 2021)
CD14.13	Appeal Decision - Oving Road, Chichester (August 2017)
CD14.14	Appeal Decision - Land to the west of Langton Road, Norton (September 2018)
CD14.15	Appeal Decision - Land to the rear of the former Dylon International Premises, Station Approach, Lower Sydenham, London (June 2019)
CD14.16	Appeal Decision - Oxford Brookes University, Wheatley Campus, Wheatley, Oxford (April 2020)
CD14.17	Appeal Decision - Land off Aviation Lane, Burton-upon-Trent (October 2020)
CD14.18	Appeal Decision - Winterfield Lane, East Malling (March 2021)
CD14.19	Appeal Decision - Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (January 2022)
CD14.20	Appeal Decision - Maitland Lodge, Billericay (November 2022)
CD14.21	Appeal Decision - Land at Dene Road, Cotford St Luke (February 2023)
CD14.33	Appeal Decision: Land adjacent to Comerways, High Street, Twyning, Tewkesbury (13 July 2015)
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CD15.2	SoS Decision - Franklands Drive (December 2006)
CD15.3	SoS Decision - Land North of Viaduct adj. Orchard Business Park, Ledbury (March 2021)

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 **Vistry Homes Limited**.
- 1.2 The proposed development is for up to 150 dwellings, of which 40% (up to 60 dwellings) are to be provided on-site as affordable housing.
- 1.3 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.
- 1.4 The proposed tenure split will be 25% First Homes (15 units), 8% Shared Ownership (5 units) and 67% Affordable Rented (40 units) which meets the council's requirement of a ratio of 2:1 affordable rented housing to shared ownership housing¹.
- 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 decision² considering evidence of need in the area. It should be read alongside the main Planning Evidence of Oliver Bell³ (Nexus 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 As agreed at paragraph 10.1 of the Affordable Housing Statement of Common Ground (**CD8.1**)

² For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

³ **CD9.6**

and have been in private practice since 2017. I have been employed at Tetlow King Planning Ltd for the past 6 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 Statement 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 a Freedom of Information ("FOI") request submitted to St Albans City and District Council on 12 April 2023.

1.13 A partial response was received on 11 May 2023 and a further response was received on 27 July 2023. A full response was still awaited at the time of writing, and I reserve the right to provide a supplemental statement in due course. The full FOI correspondence to date is attached at **Appendix AG1**.

1.14 This proof of evidence comprises the following 11 sections:

- Section 2 of the report establishes the importance of affordable housing as an important material planning consideration;
- Section 3 considers the consequences of not meeting affordable housing needs;
- Section 4 analyses the Development Plan and related policy framework including corporate documents;
- Section 5 considers the need for affordable housing in St Albans;
- Section 6 analyses the extent to which new affordable homes are being delivered towards meeting identified needs in St Albans;
- Section 7 considers a range of affordability indicators;
- Section 8 considers the future supply of affordable housing;
- Section 9 reviews the Councils assessment of the planning application, Statement of Case for the appeal and agreed positions in the signed Statements of Common Ground in respect of affordable housing matters;
- Section 10 reviews and responds to the Rule 6 Party Statement of Case for the appeal;
- Section 11 analyses the benefits of providing affordable housing at the appeal site; and
- Section 12 considers weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

- 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").
- 2.2 It has been reflected in a number of court cases including *Mitchell v Secretary of State for the Environment and Another*, (1995) 69 P&CR 60; *ECC Construction Limited v Secretary for the Environment and Carrick District Council*, (1995) 69 P&CR 51; *R v Tower of Hamlets London District Council, ex parte Barratt Homes Ltd* [2000] JPL 1050.

National Planning Policy Framework (20 July 2021)

- 2.3 The revised NPPF was last updated on 20 July 2021 and is, of course, a key material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 2.4 The document sets a strong emphasis on the delivery of sustainable development, an element of which is the social objective... 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).
- 2.5 Chapter 5 / paragraph 60 of the revised NPPF confirms the Government's objective of "*significantly boosting the supply of homes*".
- 2.6 The revised NPPF 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, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*" (paragraph 62).

- 2.7 The national guidance places a “corner-stone” responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. In particular, paragraph 65 establishes that “*Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership*”.
- 2.8 Affordable housing is defined within the revised NPPF’s 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)

- 2.9 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

- 2.10 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority; it is a fundamental element in the drive to address and resolve the national housing crisis.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

3.1 The National Housing Strategy⁴ sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.

3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply; despite the debate taking place almost a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in St Albans.

3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:

“I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”

3.4 When asked to clarify the word “*crisis*” by the Member for Tewkesbury, Nick Boles commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.

3.5 In response to questions, Nick Boles reaffirmed that:

“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.

⁴ Laying the Foundations: A Housing Strategy for England (November 2011)

3.6 He went on to say:

“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”

3.7 Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

3.8 Mr Boles indicates there are “a lot of statistics to prove it” my evidence in subsequent sections sets of an array of statistics, which I consider demonstrates the crisis remains as prominent now as it did in 2013.

Consequences of Failing to Meet Affordable Housing Need

3.9 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.

3.10 In August 2019 the Children’s Commissioner produced a report titled “*Bleak Houses: Tackling the Crisis of Family Homelessness in England*” to investigate impact of homelessness and in particular the effect of this upon children.

3.11 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms⁵.

3.12 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.

⁵ The Children’s Commissioner Report references a National Audit Office Report titled ‘Homelessness’ (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 3.13 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that *“Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work”*.
- 3.14 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and no choice but to move out of their local area, which can have a *“deeply disruptive impact on family life”*. This can include lack of support (from grandparents for example) and travel costs.
- 3.15 It found that a child’s education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children’s educational development can also be delayed.
- 3.16 Temporary accommodation also 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.
- 3.17 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”*.
- 3.18 More recently in May 2021, Shelter published its report *“Denied the Right to a Safe Home – Exposing the Housing Emergency”* which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that Affordability of housing is the main cause of homelessness (page 15) and that *“we will only end the housing emergency by building affordable, good quality social homes”* (page 10).
- 3.19 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years, the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:
- “Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it’s damp, cramped, or away from jobs and support networks.”* (Page 5)

“... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option.”
(Page 5)

The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability. (Page 6)

If you live in an overcrowded home, you’re more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer.
(Page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding” (Page 12)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%).” (Page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (Page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn.” (Page 25)

“Landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.” (Page 29)

“The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing.” (Page 30)

3.20 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).

3.21 The Report concludes (page 33) that for change to happen, *“we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there’s only one way to end the housing emergency. **Build more social housing**”* (emphasis in original).

3.22 In April 2022 Shelter published a further report titled *“Unlocking Social Housing: How to fix the rules that are holds back building”*. The first paragraph of the Executive Summary is clear that:

“Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings. Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food.”

3.23 The Executive Summary goes on to state that **“An affordable and secure home is a fundamental human need”** (emphasis in original) noting that one in three of us don’t have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

3.24 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the 'infrastructure levy'. It states that:

“This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners.” (My emphasis).

3.25 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – *“That’s taxpayer money subsidising private landlords providing insecure and often poor-quality homes.”* The paragraph goes on to note that:

“The lack of social housing has not just pushed homeownership out of reach, it’s made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home.”

- 3.26 Regarding the temporary accommodation (“TA”) the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that *“TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies.”*
- 3.27 Page 11 goes on to highlight that *“Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in.”* This means that *“Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks.”*
- 3.28 The page goes on to conclude that *“As a result, the national housing benefit bill has grown. Tenants’ incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. **There are now more private renters claiming housing benefit than ever before.**”* (Emphasis in original).
- 3.29 Page 9 is also clear that *“Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters’ housing benefit simply doesn’t meet the cost of paying the rent.”*
- 3.30 In considering the consequences of this page 12 notes that *“With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution, and homelessness.”*
- 3.31 Finally, page 21 is clear that:

“For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one’s life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory, but also

contributes to the threads of society by helping people contribute to their communities.

The evidence is clear, the financial requirements to own one's home are out of reach for many. And many will spend years stuck in a private rented sector that's not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them.” (My emphasis).

The Cost of Living Crisis

3.32 On 21 November 2022, the House of Commons published its 'Rising Cost of living in the UK' briefing report which highlights that the annual rate of inflation reached 11.1% in October 2022, a 41-year high, affecting the affordability of goods and services for households.

3.33 The briefing report details at Section 5.1 that:

“91% of adults in Great Britain reported an increase in their cost of living in October-November 2022 since the same period in 2021”. Moreover, Section 5.1 further specifies that “65% of those who reported a rise in the cost of living between 26 October - 6 November 2022 say they are spending less on non-essentials as a result, while 63% report using less energy at home and 44% report cutting back on essentials like food shopping. 2% were being supported by a charity, including food banks.” (My emphasis).

3.34 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits. Shelter published a briefing report in September 2022 titled 'Briefing: Cost of Living Crisis and the Housing Emergency' which further explains the private rented sector problem on page one:

“LHA which determines the amount of housing benefit private renters receive has been frozen since March 2020 while private rents have risen 5% in England – and even more in some parts of the country. The freeze has left low-income private renters in an incredibly precarious position. 54% of private renters claiming housing benefit have a shortfall to their rent.” (My emphasis).

3.35 The Shelter briefing sets out that low-income households (including those at risk of homelessness) have no choice but to turn to the private rented sector due to a severe shortage of affordable housing and concludes on page two that *“the only sustainable solution is to address the causes of the housing emergency by investing in truly affordable social homes”*.

Conclusions

3.36 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. 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.

3.37 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. 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.

3.38 I am strongly of the opinion that a step change in delivery of affordable housing is needed now.

3.39 The acute level of affordable housing need in St Albans coupled with worsening affordability will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 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.
- 4.2 The relevant Development Plan in respect of affordable housing for the appeal site comprises the St Albans District Local Plan Review (1994).
- 4.3 Other material considerations in respect of affordable housing matters include the National Planning Policy Framework (2021), the Planning Practice Guidance (March 2014, ongoing updates), the St Albans City and District Council Affordable Housing Supplementary Planning Guidance (2004), the emerging Local Plan 2041 (Regulation 18 version), as well as several corporate documents.

The Development Plan

St Albans District Local Plan Review (1994) – CD2.1

- 4.4 The St Albans District Local Plan review was adopted in November 1994, covering the period 1981 to 1996 (and, for Housing, 2001⁶). 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.
- 4.5 **Policy 1** (Metropolitan Green Belt) requires proposals within the Green Belt but outside settlements identified in Policy 2 (see below) to demonstrate that Very Special Circumstances apply. This policy, therefore, reflects the provisions of the NPPF whereby inappropriate development in the Green Belt can be approved provided “very special circumstances” are found to exist.
- 4.6 **Policy 2** of the Plan is concerned with the settlement strategy for the district. The policy classifies Colney Heath (where the appeal site is located) as a ‘Green Belt Settlement’ where the provisions of Policy 1 apply.

⁶ Policy 3 Housing Land Supply 1981-1996 and 1986-2001.

- 4.7 New housing development in green belt settlements is dealt with by **Policy 6** and states that:

‘Within the Green Belt settlements listed in Policy 2, housing development will not normally be permitted unless the dwellings are permitted to meet the local needs of agriculture, forestry, leisure and local services which cannot practically be met in a location outside the green belt.’

- 4.8 The policy goes on to highlight that *‘affordable housing schemes in the green belt settlements will be assessed against Policy 8’*

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

- 4.10 It is agreed in the main Statement of Common Ground (**CD8.3, p.16, [6.48]**) that *“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”*.

- 4.11 The policy also sets a target of 200 affordable dwellings per annum in its supporting text (paragraph 3.36), but 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 weight⁷.

- 4.12 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.

- 4.13 However, Policy 8 also requires the 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.

⁷ The Council has failed year on year to meet this insufficient target for affordable housing delivery, see Section 6 of this Evidence.

- 4.14 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.

Material Considerations

Emerging Local Plan 2041 – CD3.1

- 4.15 The Council is currently preparing a new Local Plan to 2041 and the Regulation 18 consultation runs from 12 July 2023 to 25 September 2023.
- 4.16 Pages 6 to 7 of the emerging Local Plan 2041 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).

- 4.17 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 Register⁸.”

- 4.18 **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.

⁸ On 31 March 2023 there were 641 households on the Council’s Housing Register – please see Section 7 of this Proof of Evidence for full details.

St Albans City and District Council Affordable Housing Supplementary Planning Guidance (2004) – CD2.4

- 4.19 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.
- 4.20 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 its Appendix B. However as noted above it has been agreed in the main Statement of Common Ground (**CD8.3, p.16, [6.48]**) that Policy 7A does not apply to the appeal site.

- 4.21 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.”

- 4.22 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.”*
- 4.23 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.
- 4.24 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.
- 4.25 It should also be noted that paragraph 64 of the National Planning Policy Framework (“NPPF”) (2021) 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).

4.26 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*”.

Corporate Documents

4.27 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:

- St Albans City and District Council Housing Strategy 2023-2026 (**CD10.4**);
- St Albans City and District Council Homelessness Strategy 2022-2025 (**CD10.5**);
and
- St Albans City and District Council Corporate Plan 2021-2026 (**CD10.6**).

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

Conclusions on the Development Plan and Related Policies

4.29 The Development Plan for St Albans City and District Council currently comprises the St Albans District Local Plan Review (1994).

4.30 I consider that the evidence set out in this section 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 issue which urgently needs to be addressed within St Albans District.

4.31 The appeal proposals provide an affordable housing contribution (40%) which exceeds the Affordable Housing Supplementary Planning Guidance (2004) minimum requirement of 35%⁹; 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.

4.32 The provision of up to 60 affordable homes at the appeal site will make a substantial contribution towards the annual affordable housing needs of the district, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail at Section 6 of this Proof of Evidence.

⁹ which relates to Policy 7A of the Local Plan Review (1994)

Affordable Housing Needs

Section 5

The Development Plan

- 5.1 The adopted Development Plan (Policy 7A) sets a target of 200 affordable dwellings per annum during the Local Plan period which covers the period 1981 to 1996. The Local Plan was subsequently reviewed which extended the period to 2001, some 22 years ago.
- 5.2 As such, the Local Plan target is considerably out of date and the assessments of affordable housing needs identified below provide a more up to date indication of affordable housing needs for the District.

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

- 5.3 The South West Hertfordshire Strategic Housing Market Assessment (“2016 SHMA”) was published in January 2016 and covers the 23 year period 2013 to 2036.
- 5.4 Table 39 of the 2016 SHMA sets out the annualised estimated affordable housing need for each authority and is replicated below at Figure 5.1. It demonstrates that St Albans and Watford jointly have the highest affordable housing need across the region.

Figure 5.1: 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

5.5 Table 40 (replicated at Figure 5.2 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 5.2: 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

5.6 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 annum¹⁰ in St Albans.

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

5.7 The South West Hertfordshire Local Housing Need Assessment (“2020 LHNA”) was published in September 2020 and covers 16 year period from 2020 to 2036.

5.8 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.

5.9 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.

5.10 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 also worth noting that the affordability threshold used is 5% higher than in the 2016 SHMA.

¹⁰ 102 + 515 = 617 dwellings

- 5.11 It is worth noting that this issue was considered in a recent appeal decision (February 2023) at Land at Dene Road, Cotford St. Luke (**CD14.21, p.18-19, [100-101]**) Inspector Bristow found at paragraphs 100 to 101 of his decision that:

“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).

- 5.12 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

- 5.13 The council’s latest Five Year Housing Land Supply (“5YHLS”) Statement (**CD10.3**) for the period 2022 to 2027 sets out that the council’s housing supply is being measured against a figure based on the Government’s Standard Methodology for assessing Local Housing Need.
- 5.14 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**¹¹.*

(My emphasis)

5.15 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 (2021).

5.16 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 period¹².”

5.17 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.

5.18 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

Conclusions on Affordable Housing Needs

5.19 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.

5.20 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.

¹¹ Paragraph: 006 Reference ID: 2a-006-20190220

¹² Paragraph: 024 Reference ID: 2a-024-20190220

Affordable Housing Delivery

Section 6

Introduction

- 6.1 This section of the evidence analyses the extent to which new affordable homes are being delivered towards meeting identified needs in St Albans. The figures within this section have been agreed with the Council in the Affordable Housing Statement of Common Ground (CD8.1).

Affordable Housing Delivery in St Albans District

- 6.2 Figure 6.1 illustrates the delivery of affordable housing (“AH”) in St Albans since the start of the 2016 SHMA period in 2013/14 net of demolitions.

Figure 6.1: Additions to Affordable Housing Stock (Net of Demolitions), 2013/14 to 2021/22

Monitoring Period	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%
Total	3,700	643	17%
Avg. Pa.	411	71	

Source: St Albans City and District Council Authorities Monitoring Reports (2015 to 2022)

- 6.3 Between 2013/14 and 2021/22, a total of 3,700 dwellings were delivered in St Albans, equivalent to 411 per annum. Of these, 643 dwellings were affordable tenures, equivalent to 71 per annum. This equates to just 17% affordable housing delivery net of demolitions.
- 6.4 However, it is important to note that the net of demolitions affordable additions figure does not take into account any losses from affordable housing stock through Right to Buy sales from existing Council and Registered Provider¹³ stock. It also does not take account of any acquisitions funded through the receipts from eligible sales.
- 6.5 Figure 6.2 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.
- 6.6 A net loss of 143¹⁴ affordable dwellings over this period equates to 22% of the additions to affordable housing stock (Net of Demolitions) figure of 643 affordable dwellings over the nine-year period.

¹³ 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.

¹⁴ $(185 + 16) - 58 = 143$ dwellings

Figure 6.2: Net of Right to Buy Additions to Affordable Housing Stock, 2013/14 to 2021/22

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 of RtB)	Additions to AH Stock (Net of RtB) 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	11	0	172	33%
2021/22	314	71	0	15	0	56	18%
Total	3,700	643	58	185	16	500	14%
Avg. Pa.	411	71	12	23	2	56	

Source: St Albans City and District Council Authorities Monitoring Reports (2015 to 2022); DLUHC Live Tables 691 and 693c2; and Private Registered Provider Social Housing Stock in England Statistical Data Returns (2011/12 to 2021/22).

6.7 Figure 6.2 demonstrates that, on average between 2013/14 and 2021/22, the Council has added just 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.

Affordable Housing Delivery Compared to Affordable Housing Needs in St Albans

6.8 Figure 6.3 illustrates net of Right to Buy affordable housing additions compared to the affordable housing need figure of 617 net affordable dwellings per annum between 2013/14 and 2035/36, as set out in the 2016 SHMA.

Figure 6.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2016 SHMA, 2013/14 to 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	2016 SHMA AH Needs Per Annum (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	172	617	-445	-4,492	28%
2021/22	56	617	-561	-5,053	9%
Total	500	5,553	-5,053		9%
Avg. Pa.	56	617	-561		

Source: St Albans City and District Council Authorities Monitoring Reports (2015 to 2022); DLUHC Live Tables 691 and 693c2; Private Registered Provider Social Housing Stock in England Statistical Data Returns; and 2016 SHMA.

6.9 Since the start of the 2016 SHMA period in 2013/14, affordable housing completions (net of Right to Buy) have averaged just 56 net affordable dwellings per annum, against a need of 617 net affordable dwellings per annum.

- 6.10 A shortfall of -5,053 affordable dwellings has arisen over the nine-year period, equivalent to an average annual shortfall of -561 affordable dwellings.
- 6.11 As demonstrated by Figure 6.3, the delivery of only 500 affordable homes net of Right to Buy over the period means that just 9% of identified affordable housing needs were met.
- 6.12 Put another way, 91% households in need of an affordable home were let down by the Council's inability to deliver.
- 6.13 Figure 6.4 illustrates net of Right to Buy affordable housing additions compared to the affordable housing need of 828 net affordable dwellings per annum between 2020/21 and 2035/36, as set out in the 2020 LHNA.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2020 LHNA, 2020/21 to 2021/22

Monitoring Period	Additions to AH Stock (Net of RtB)	2020 LHNA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	172	828	-656	-656	21%
2021/22	56	828	-772	-1,428	7%
Total	228	1,656	-1,428		14%
Avg. Pa.	114	828	-714		

Source: St Albans City and District Council Authorities Monitoring Reports (2021 to 2022); DLUHC Live Tables 691 and 693c2; Private Registered Provider Social Housing Stock in England Statistical Data Returns; and 2020 LHNA.

- 6.14 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.
- 6.15 A shortfall of -1,428 affordable dwellings has arisen in the first two years of the 2020 LHNA period, equivalent to -714 per annum.
- 6.16 As demonstrated by Figure 6.4, delivery of only 228 affordable homes net of Right to Buy over the period means that just 14% of identified affordable housing needs were met.
- 6.17 Put another way 86% households in need of an affordable home were let down by the Council's inability to deliver. There can be no doubt there is an acute need for affordable housing in St. Albans which is not being addressed.

- 6.18 With this in mind it is worth noting that in the Affordable Housing Statement of Common Ground (CD8.1, p.15, [10.16]) the Council have agreed that *“there is an acute need for affordable housing across SACDC¹⁵ and annual needs are far greater than what has been provided to date”*.

Conclusions on Affordable Housing Delivery

- 6.19 The above evidence demonstrates that across St Albans District, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 6.20 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 14% of overall housing delivery, equating to just 55 affordable dwellings per annum.
- 6.21 A shortfall of -5,053 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.
- 6.22 Against the most recent assessment of affordable housing need in St Albans, a shortfall of -1,428 affordable dwellings has arisen in the two first years of the 2020 LHNA period, which estimated a need 828 affordable dwellings per annum between 2020 and 2036.
- 6.23 It is clear there is no prospect that the Council will be able to achieve its identified needs for affordable housing unless there is a step change in delivery. 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.
- 6.24 In light of the identified level of need, there can be no doubt that the delivery of up to 60 affordable dwellings at the appeal site will make a substantial contribution to the affordable housing needs of St Albans City and District Council.

¹⁵ St Albans City and District Council

Affordability Indicators

Section 7

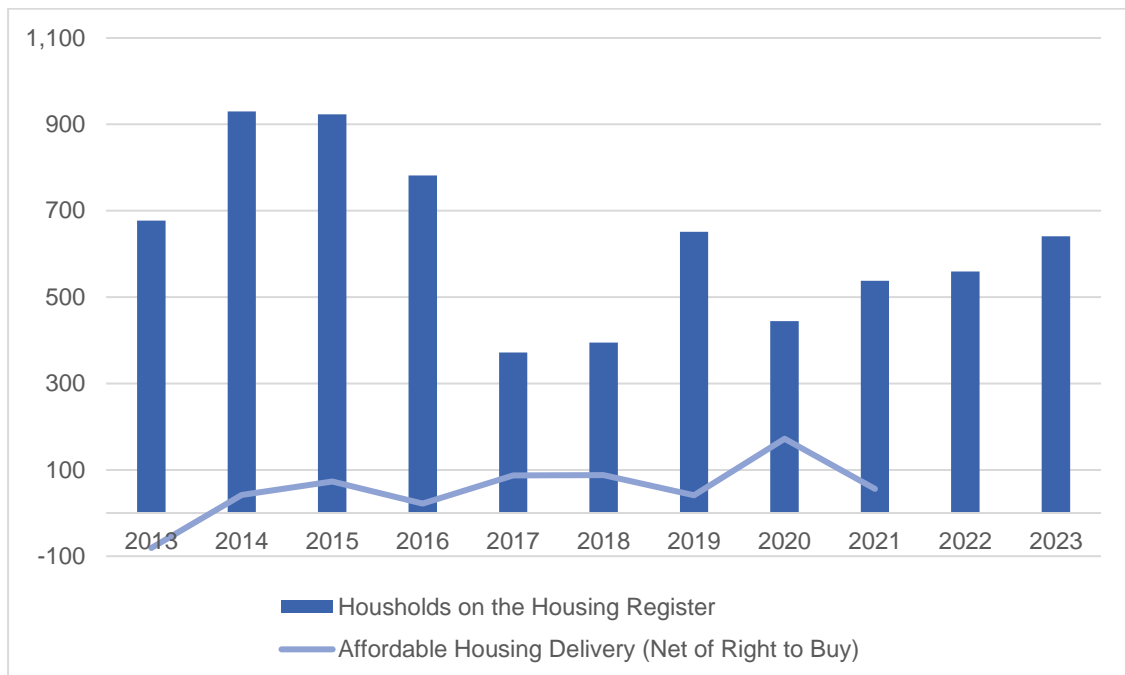
Market Signals

- 7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of plan making.

Housing Register

- 7.2 The Council's Freedom of Information response (**Appendix AG1**) confirms that on 31 March 2023 there were 641 households on the council's Housing Register. This represents a 15% increase in a single year from 559 households on 31 March 2022 (which itself was a 4% increase from 538 households on 31 March 2021).
- 7.3 As of 12 April 2023, there were 303 households who specified a preference for an affordable home in Colney Heath Civil Parish.
- 7.4 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register and affordable housing delivery (net of Right to Buy) across St Albans since the start of the 2016 SHMA period in 2013/14.

Figure 7.1: Number of Households on the Housing Register Compared with Affordable Housing Delivery (Net of Right to Buy), 2013 to 2023



Source: Freedom of Information response (11 May 2023); St Albans City and District Council Authorities Monitoring Reports (2015 to 2022); DLUHC Live Tables 600, 691 and 693c2; and Private Registered Provider Social Housing Stock in England Statistical Data Returns (2011/12 to 2021/22).

Note: completions figures are not yet available for the 2022/23 monitoring period

7.5 As Figure 7.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in St Albans since 2013.

7.6 Footnote 4 of DLUHC¹⁶ 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” (My emphasis).

¹⁶ Department for Levelling Up, Housing and Communities

- 7.7 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 Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.
- 7.8 Following the 2012 changes brought about by the Localism Act, in August 2012 St Albans published a revised Housing Allocations Scheme which received further revisions in **September 2013, December 2013, July 2015, May 2016, August 2018, February 2021 and December 2021**.
- 7.9 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 15% in the past 12-months, indicating a worsening of affordability across St Albans.
- 7.10 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 7.11 It may also have other negative impacts when you consider that those who are excluded from the register may be forced to move away from St Albans to cheaper more affordable areas but due to their connections to the area, they still have to commute back into the area to visit friends, family, and travel to their place of work.
- 7.12 One clear impact of this is that such an eventuality would generate extra traffic which brings in to question the sustainability of such an approach.
- 7.13 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester (**CD14.13, p.11, [63]**) in August 2017. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

“The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal” (my emphasis).

7.14 Furthermore, in the recent appeal decision at Oxford Brookes University Campus at Wheatley, (**CD14.16, p.74, [13.101]**) Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses” (my emphasis).

7.15 The Inspector went on to state at paragraph 13.102 that:

“Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list” before concluding that *“Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”*.

7.16 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

“The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”.

7.17 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In my opinion the numbers on LPA’s housing register remains high.

7.18 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. affordable rented, starter homes, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

- 7.19 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. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the most recent NPPF.
- 7.20 The Franklands Drive Secretary of State appeal decision in 2006 (**CD15.2, p.57, [7.13]**) underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 of the Inspector’s report the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.
- 7.21 As such the number of households on the Housing register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents. Furthermore, as previously raised the wider definition of affordable housing is not reflected in the SHMA.

Waiting Times

- 7.22 In addition, the wait to be housed in an affordable home within the area ranges from 1.44 years for a 2-bed affordable home through to 2.57 years for a 4-bed+ affordable home.

Figure 7.2: Housing Register Average Waiting Times, March 2023

Size of Affordable Property	Average Waiting Time to be Housed on 31 March 2023
1-bedroom home	1.78 years
2-bedroom home	1.44 years
3-bedroom home	1.95 years
4+ bedroom home	2.57 years

Source: Freedom of Information response (27 July 2023)

- 7.23 The waiting times for all affordable property sizes is set out at Figure 7.2 above and presents further stark evidence of a deteriorating affordable housing crisis afflicting St Albans.

Housing Register Bids and Lettings

- 7.24 Figure 7.3 below demonstrates average number of bids per property in Colney Heath Civil Parish over the 2022/23 monitoring period for a range of types of affordable property.

Figure 7.3: Bids Per Property in Colney Heath Civil Parish, March 2022 to March 2023

Type of affordable property	Average Bids Per Property (1 April 2022 to 31 March 2023)
	Colney Heath Civil Parish
1-bed affordable dwelling	34 bids
2-bed affordable dwelling	39 bids
3-bed affordable dwelling	80 bids
4+ bed affordable dwelling	95 bids

Source: Freedom of Information response (11 May 2023)

- 7.25 Figure 7.3 demonstrates that between 1 April 2022 to 31 March 2023 there were an average of 34 bids per 1-bed affordable dwelling put up for let in the parish, 39 average bids per 2-bed affordable dwelling and 80 average bids per 3-bed affordable dwelling, and 95 bids per 4+ bed affordable dwelling.
- 7.26 This should be viewed in context of the fact that the FOI response also highlights that over the 2022/23 monitoring period there were **just 19 social housing** letting in Colney Heath Civil Parish.
- 7.27 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 parish this is not being met.

Help to Buy Register

- 7.28 Further evidence in respect of the need across St Albans for affordable housing is provided in information from Help to Buy South, at **Appendix AG4**.
- 7.29 Help to Buy South was one of three agents appointed by the Government to help provide Help to Buy schemes across England. They covered the South of England. Households who were seeking shared ownership homes were required to register with Help to Buy South so that they could apply for properties.
- 7.30 The Help to Buy Register provides details of those households which sought shared-ownership accommodation in the south of England. This demonstrates that as of 27 March 2023, 776 households were seeking a shared ownership home in St Albans. This is clearly a significant proportion of those seeking assistance with their housing.

Temporary Accommodation

- 7.31 The FOI response details that 114 households were housed in temporary accommodation within the St Albans region on 31 March 2023. St Albans City and District Council has a responsibility to house these households.
- 7.32 Furthermore, an additional 3 households were housed in temporary accommodation outside the St Albans region on 31 March 2023.
- 7.33 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.
- 7.34 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.
- 7.35 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

- 7.36 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 206 households in need of homelessness prevention duty¹⁷, and a further 110 households in need of relief duty¹⁸ from the Council.

¹⁷ 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.

¹⁸ 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.

7.37 Page 3 of the St Albans Homelessness Strategy 2022-2025 (**CD10.5**) 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.

7.38 Furthermore a 2017 report by the National Audit Office (“NAO”) found that:

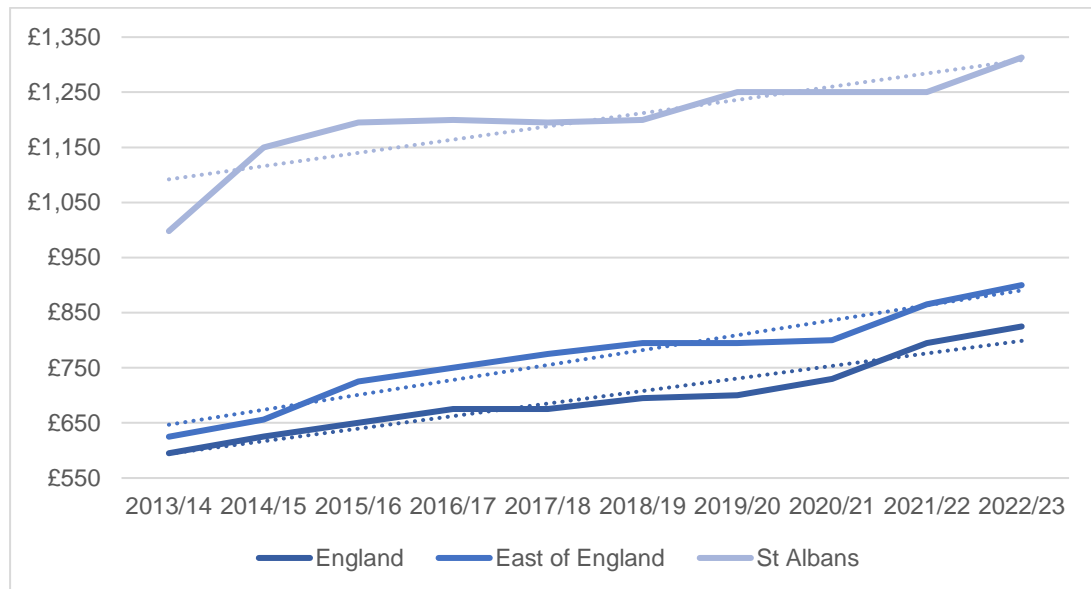
“The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England. The proportion of households accepted as homeless by local authorities due to the end of an assured shorthold tenancy increased from 11% during 2009-10 to 32% during 2016-17. The proportion in London increased during the same period from 10% to 39%. Across England, the ending of private sector tenancies accounts for 74% of the growth in households who qualify for temporary accommodation since 2009-10. Before this increase, homelessness was driven by other causes. These included more personal factors, such as relationship breakdown and parents no longer being willing or able to house children in their own homes. The end of an assured shorthold tenancy is the defining characteristic of the increase in homelessness that has occurred since 2010.” (Emphasis in original).

7.39 The NAO report also noted that *“The affordability of tenancies is likely to have contributed to the increase in homelessness”* and that *“Changes to Local Housing Allowance are likely to have contributed to the affordability of tenancies for those on benefits and are an element of the increase in homelessness.”*

Private Rental Market

7.40 Valuation Office Agency (“VOA”) and Office for National Statistics (“ONS”) data (first produced in 2013/14) 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.

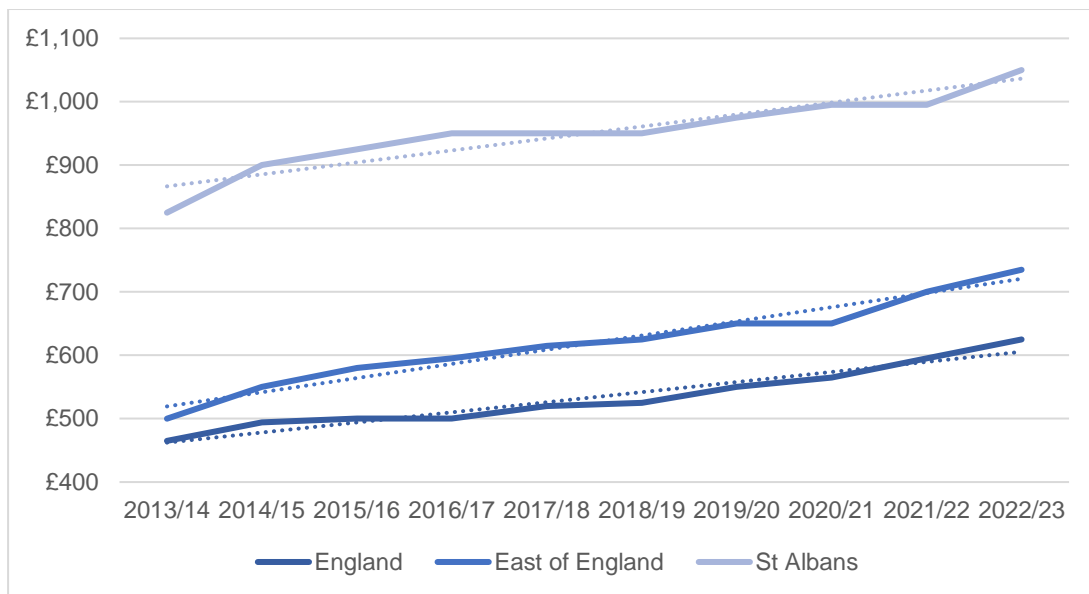
Figure 7.4: Median Private Sector Rents, 2013/14 to 2022/23



Source: VOA and ONS Private Rental Market Statistics

- 7.41 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.
- 7.42 Lower quartile rents are representative of the ‘entry level’ of the private rented sector and include dwellings sought by households on lower incomes.
- 7.43 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 7.5: Lower Quartile Private Sector Rents, 2013/14 to 2022/23



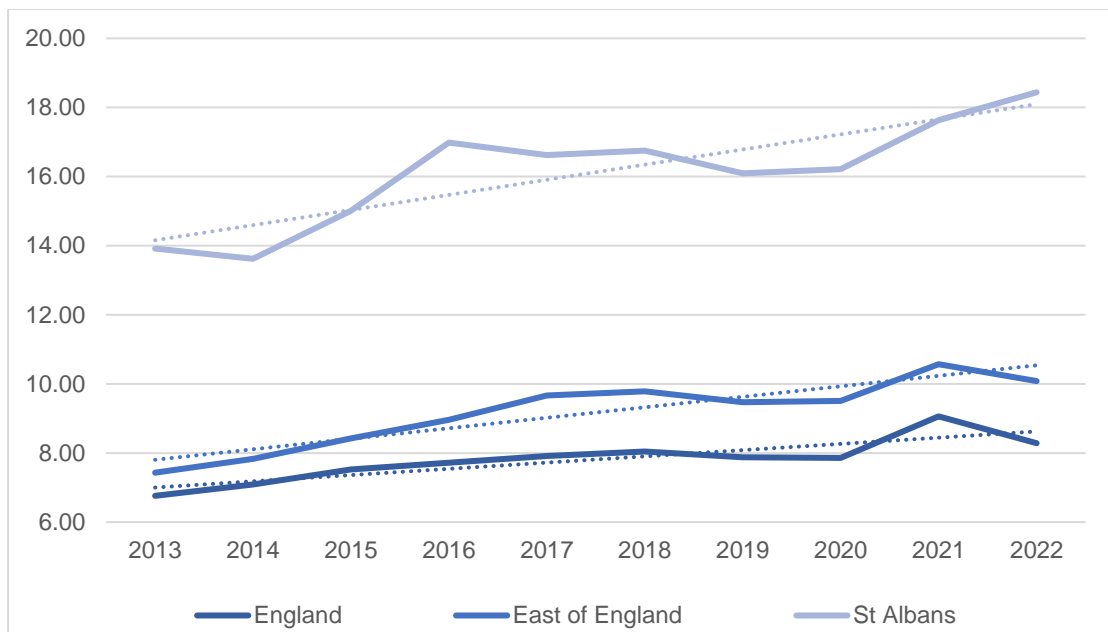
Source: VOA and ONS Private Rental Market Statistics

- 7.44 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.
- 7.45 It is worth noting that a July 2023 BBC article found that *“Competition among renters is so intense that there are 20 requests to view each available property, according to data commissioned by the BBC.”* The article detailed that for the East of England region this figure was even higher at an average of 24 enquires per rental property.
- 7.46 It also highlighted that *“[d]emand from prospective renters has soared as rising mortgage rates are making home ownership a more distant prospect and prompting some landlords to sell up.”* The article went on to note that *“[t]he mismatch between demand from tenants and supply from landlords has contributed to sharp increases in rents”*.

Median House Prices

- 7.47 The ratio of median house prices to median incomes in St Albans now stands at 18.44, a 32% increase since the start of the 2016 SHMA period in 2013 where it stood at 13.92.
- 7.48 As demonstrated by Figure 7.6, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.
- 7.49 A ratio of 18.44 in St Albans stands substantially above the national average of 8.28 (+123%) and significantly the East of England average of 10.08 (+83%).

Figure 7.6: Median Workplace-Based Affordability Ratio comparison, 2013 to 2022



Source: ONS Ratio of House Price to Work-place Based Earnings

- 7.50 In the 12-month period between March 2021 and March 2022 the median house price to income ratio across St Albans has increased by 9% from 17.63 to 18.44. This means that those on median incomes in St Albans, seeking to purchase a median priced property, now need to find more than 18 times their annual income to do so.
- 7.51 It is also worth noting that a figure of 8 times average incomes was described as problematic 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 and rising.
- 7.52 As demonstrated by Figure 7.7 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 7.7: Median Affordability Ratio's for Local Authorities in the East of England Comparison, 2013 to 2022

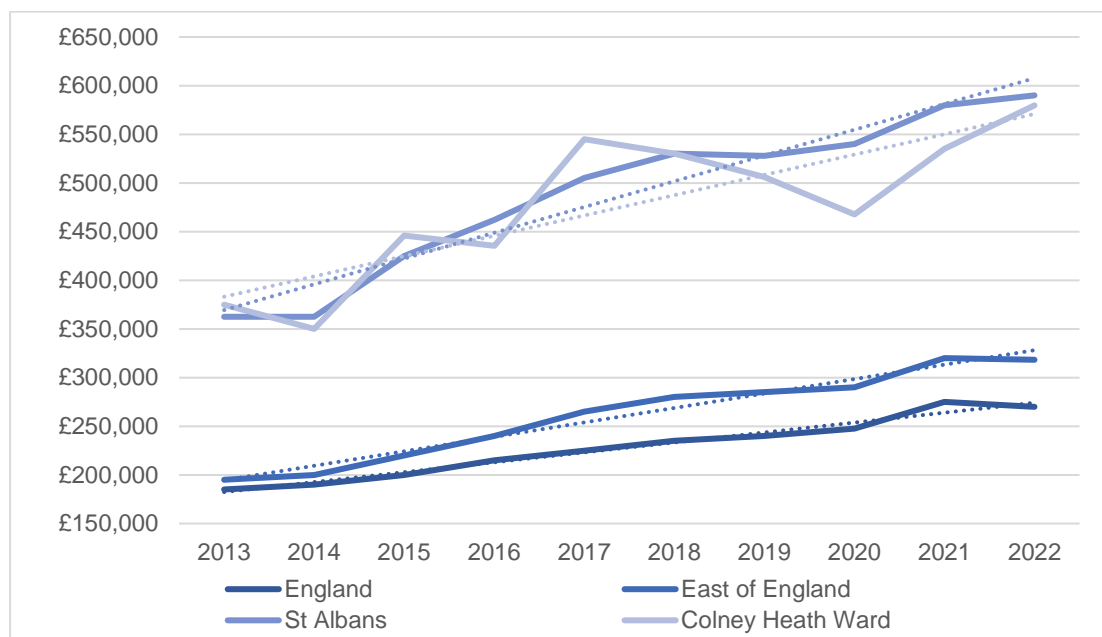
2022 Rank	Local Authority	Ratio of median house prices to median gross annual workplace based earnings	
		2013	2022
1	St Albans	13.92	18.44
2	Epping Forest	11.33	15.48
3	Hertsmere	10.17	14.39
4	Watford	7.74	14.21
5	Dacorum	8.86	13.86
6	Brentwood	8.91	13.65
7	Cambridge	9.61	13.25
8	Uttlesford	11.22	13.18
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 Ratio of House Price to Work-place Based Earnings

- 7.53 Figure 7.8 illustrates the median house prices for England, East of England, St Albans, and Colney Heath Ward. It demonstrates that they have increased dramatically between the start of the 2016 SHMA period in 2013 and 2022.

Figure 7.8: Median House Price Comparison, 2013 to 2022



Source: ONS HPSSA Datasets

- 7.54 The median house price across Colney Heath Ward has risen by 55% from £375,000 in 2013 to £579,750 in 2022. This compares to a 63% increase across St Albans, a 63% increase across the East of England and a national increase of 46% over the same period.

7.55 In 2022 median house prices in Colney Heath (£579,750) were comparable with St Albans (£590,000), 82% higher than across the East of England (£318,275) and 115% higher than the national figure (£270,000).

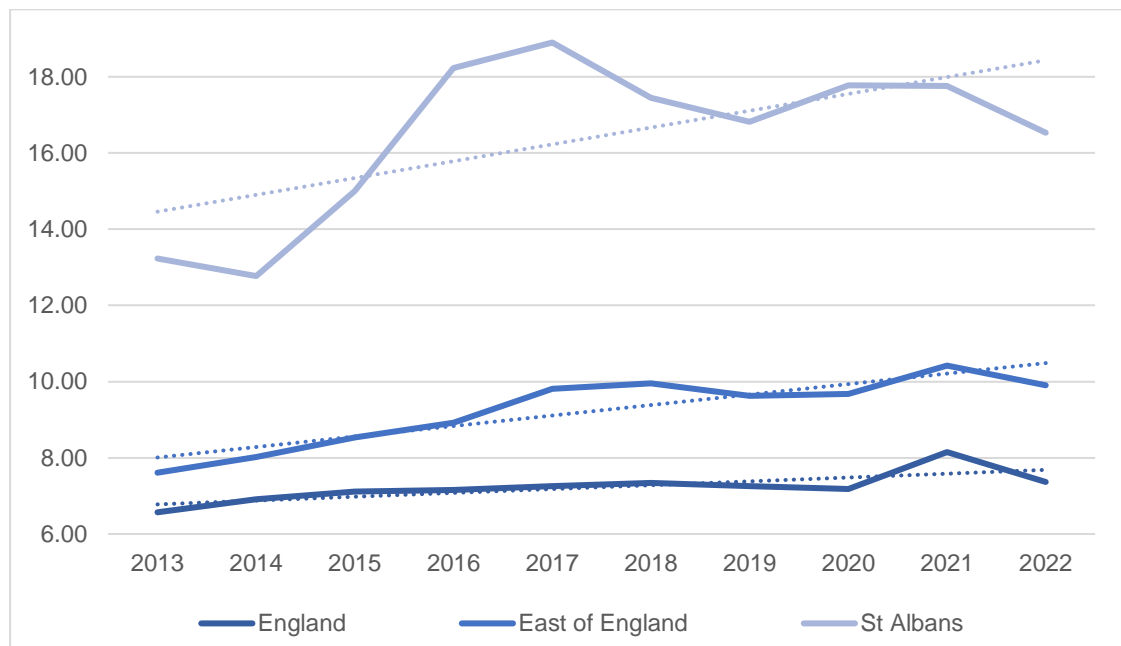
Lower Quartile House Prices

7.56 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 where it stood at 13.23.

7.57 As demonstrated by Figure 7.9, there is no clear trend of improvement in the affordability ratio, with the linear lines for each area clearly trending upwards.

7.58 Once again it remains the case that a 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%).

Figure 7.9: Lower Quartile Workplace-Based Affordability Ratio comparison, 2013 to 2022



Source: ONS Ratio of House Price to Work-place Based Earnings

7.59 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 and rising.

7.60 As demonstrated by Figure 7.9 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 7.10: Lower Quartile Affordability Ratio's for Local Authorities in East of England Comparison, 2013 to 2022

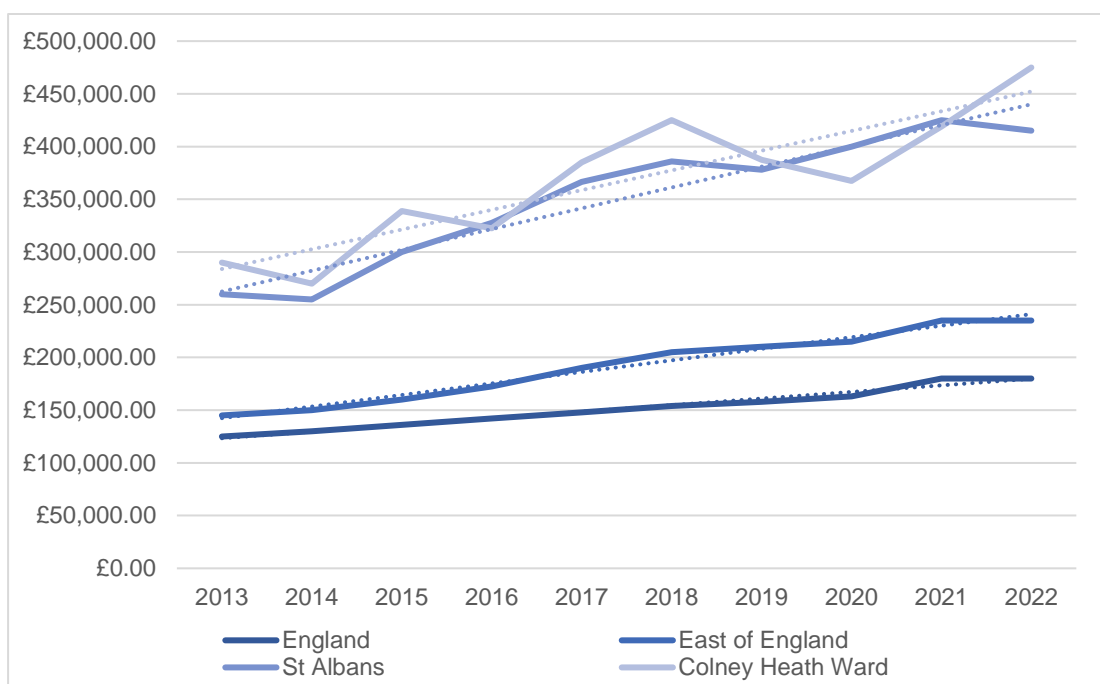
2022 Rank	Local Authority	Ratio of lower quartile house prices to median gross annual workplace based earnings	
		2013	2022
1	St Albans	13.23	16.53
2	Uttlesford	11.66	15.30
3	Epping Forest	12.02	15.28
4	Dacorum	9.63	15.23
5	Hertsmere	11.06	13.98
6	Brentwood	9.99	13.31
7	Cambridge	9.87	13.24
8	Watford	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 Ratio of House Price to Work-place Based Earnings

7.61 Figure 7.11 below illustrates the lower quartile house prices for England, the East of England, St Albans, and Colney Heath Ward. It demonstrates that they have increased dramatically between the start of the 2016 SHMA period in 2013 and 2022.

Figure 7.11: Lower Quartile House Prices, 2013 to 2022



Source: ONS HPSSA Datasets

- 7.62 The lower quartile house price across Colney Heath Ward has risen by 64% from £290,000 in 2013 to £475,000 in 2022. This compares to a 60% increase across St Albans, a 62% increase across the East of England and a national increase of 44% over the same period.
- 7.63 In 2022 lower quartile house prices in Colney Heath Ward (£475,000) were 14% higher than across St Albans (£415,000), 102% higher than across the East of England (£235,000) and 164% higher than the national figure (£180,000).

Conclusions on Affordability Indicators

- 7.64 As demonstrated through the analysis in this section, affordability across St Albans has been and continues to be, in crisis.
- 7.65 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.
- 7.66 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 which is the highest figure in the East of England.
- 7.67 Market signals indicate a worsening trend in affordability in St Albans and within Colney Heath Ward. By any measure of affordability, this is an authority in a deep and sustained an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Future Supply of Affordable Housing

Section 8

Introduction

- 8.1 This section of the evidence considers the future need and supply of affordable housing across St Albans. The figures within this section have been agreed with the Council in the Affordable Housing Statement of Common Ground (**CD8.1**).

Future Affordable Housing Supply

- 8.2 The future delivery of affordable housing is highly uncertain. Within St Albans, the delivery of affordable homes has fluctuated considerably since the start of the 2016 SHMA period in 2013/14, as illustrated in Figures 8.1 and 8.2.
- 8.3 The delivery of a higher number of affordable homes in one year obviously does not guarantee this will continue for future years. The supply of affordable housing is affected by the local market factors, including the number of sites with planning permission and also wider national factors including availability of public funding.

Addressing the Shortfall in Affordable Housing Delivery

- 8.4 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.
- 8.5 Since the start of the 2020/21 monitoring period, the Council have overseen the delivery of just 228 affordable homes (net of Right to Buy) against a need of 1,656 net new affordable homes, which has resulted in a shortfall of -1,428 affordable homes over the two-year period.
- 8.6 It is agreed that any shortfall in delivery should be dealt with within the next five years. This is also an approach set out within the PPG¹⁹ and endorsed at appeal.

¹⁹ Paragraph: 031 Reference ID: 68-031-20190722

8.7 The Inspector presiding over the appeal at land off Aviation Lane, Burton-upon-Trent where I presented evidence, which was allowed in October 2020 (**CD14.17, p.2, [8]**) set out at paragraph 8 of her decision that:

“In my view, the extent of the shortfall and the number of households on the Council’s Housing Register combine to demonstrate a significant pressing need for affordable housing now. As such, I consider that, the aim should be to meet the shortfall as soon as possible.” (My emphasis).

8.8 Similarly, in considering the disputed sites in the Council’s five-year housing land supply that did not yet have planning permission the Inspector stated at paragraph 9 that:

“I am not convinced, in accordance with the guidance in the PPG and the Framework, that there is clear evidence that the 108 dwellings relied on by the Council from these two sites would be deliverable within five years. There is nothing within the Framework or the PPG to suggest that this definition should not apply to affordable housing as well as market housing.” (My emphasis).

8.9 The Inspector went on to set out, at paragraph 11, that:

“My concern, given the nature of the development proposed, is whether the affordable housing needs of the District are being met. These are households in need of a home now. While the Council is of the view that there is not an overwhelming need for affordable housing which cannot be met within the settlement boundary, on allocated sites or through current planning permissions, just by excluding these three sites from its five year housing supply, the Council’s expectation of 884 houses coming forward within five years is reduced to 768 which would be below the five year requirement of 818 dwellings including the existing shortfall.” (My emphasis).

8.10 It is therefore imperative that the -1,428 dwelling affordable housing shortfall accumulated since 2020/21 in St Albans is addressed as soon as possible and in any event within the next five years.

8.11 When the shortfall is factored into the 2020 LHNA identified need of 828 affordable homes per annum, the number of affordable homes the Council will need to complete substantially increases to 1,114 net affordable homes per annum for the period 2022/23 to 2026/27.

8.12 This would ensure that for the remainder of the period up to 2036 the annual affordable housing need returns to 828 per annum to deal solely with newly arising needs. This is illustrated in Figures 8.1 and 8.2.

Figure 8.1: 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 2021/22 identified in the 2020 LHNA	828
B	Net Affordable housing need for the period 2020/21 to 2021/22 (A x 2)	1,656
C	Net of Right to Buy sales Affordable housing completions for the period 2020/21 to 2021/22	228
D	Shortfall/backlog of affordable housing need for the period 2020/21 to 2021/22 (B – C)	1,428
E	Backlog affordable housing need per annum required over the period 2022/23 to 2026/27 (D/5)	286²⁰
F	Full affordable housing need per annum for the period 2022/23 to 2026/27 (A + E)	1,114
G	Full affordable housing need for the period 2022/23 to 2026/27 (F x 5)	5,570

8.13 Further illustration of the severity of the situation can be seen in Figure 8.2 below which illustrates that the Council need to deliver 5,570 net affordable homes over the next five years to address backlog needs in line with the Sedgefield approach.

Figure 8.2: Annual Affordable Housing Need 2022/23 to 2027/28 incorporating Backlog Needs Accrued between 2020/21 to 2021/22 when applying the Sedgefield Approach

Monitoring Period	2020 LHNA Net Affordable Housing Need	Net Affordable Housing Need When Addressing Backlog Within Next Five Years
2022/23	828	1,114
2023/24	828	1,114
2024/25	828	1,114
2025/26	828	1,114
2026/27	828	1,114
Total	4,140	5,570

²⁰ 1,428 / 5 years = 285.6 dwellings

- 8.14 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.
- 8.15 It should be noted that in the Roundhouse Farm, Colney Heath appeal decision (**CD14.6, p.12, [53]**) Inspector Masters noted at paragraph 53 of her decision that:
- “In SADC, the position is equally as serious. Since the period 2012/13, a total of 244 net affordable homes have been delivered at an average of 35 net dwellings per annum. Again, this equates to a shortfall also in the region of 4000 dwellings (94%) which, if to be addressed in the next 5 years, would require the delivery of 1185 affordable dwellings per annum.” (My emphasis).*
- 8.16 The figure of 1,185 per annum was based upon an accrued shortfall over the seven year period between 2013/14 and 2019/20 against the 617 per annum figure identified in the 2016 SHMA.
- 8.17 It is striking that over the first two years of the 2020 LHNA period delivery has been so poor that to address the shortfall over the next five year the council will need to deliver 1,114 affordable dwelling per annum.
- 8.18 This figure is only 6% lower than the 1,185 per annum figure needed to address the shortcomings in delivery against the requirements of the 2016 SHMA over a seven year period. The current situation can only be described as desperate.

The Future Supply of Affordable Housing

- 8.19 The Council's latest Five Year Housing Land Supply (“5YHLS”) position, covering the period 1 April 2022 to 31 March 2027, is contained within its Authority’s Monitoring Report (**CD10.3 p.31, [3.12]**) published in February 2022.
- 8.20 For the purpose of this evidence, the calculations with regard to future affordable housing delivery have been calculated using the sites included in the supply above five dwellings as they are considered to qualify for affordable housing contributions. A full breakdown is available at **Appendix AG5**.
- 8.21 Each of the applications have been reviewed to identify the percentage and unit numbers of affordable housing secured on each site. There is also publicly available information via the Council’s Authority’s Monitoring Report’s setting out the number of affordable units delivered on each site in previous years and the number of affordable dwellings with planning permission that are to be completed.

8.22 Of the 1,607²¹ committed dwellings included in the Council's latest 5YHLS, it is considered that 963 dwellings across 26 sites will come forwards on sites eligible for affordable housing, i.e., those above the five dwelling threshold. Six of the 26 sites have affordable housing completions in previous years as set out in Figure 8.3 below.

Figure 8.3: Previous affordable housing completions on sites within the 5YHLS

TK Ref.	Site	Gross AH Planned	Gross AH Completions	Gross AH Remaining
TK-001	Oaklands College, Smallford Campus, Hatfield Road, St Albans	121	103	18
TK-002	Land At Harperbury Hospital, Harper Lane (Kingsley Green)	72	46	26
TK-005	Former HSBC Training Centre, Smug Oak Lane, Bricket Wood	22	12	10
TK-009	Building Research Establishment (north & north east areas), Bucknalls Lane, Bricket Wood	35	35	0
TK-011	Beaumont School & land to north of Winches Farm, Hatfield Road, St Albans	32	32	0
TK-021	Radio Casa, Oaklands Lane, Smallford	3	3	0
Totals		285	231	54

Source: St Albans City and District Council Authorities Monitoring Reports (2014 to 2022)

8.23 The remaining market and affordable units on sites TK-001, TK-002 and TK-005 included in Figure 8.3 above are all to be delivered within the current five year period. As such these sites will contribute a total of 54 gross affordable units to the 5YHLS. The affordable housing units on the remaining sites in Figure 8.3 have all been delivered in previous years and are therefore accounted for in Figures 6.2 and 6.3.

8.24 In respect of the other 20 sites, the trajectory indicates that each of these sites will start and finish in the current five year period. The analysis therefore calculates the total number of affordable units capable of being delivered over the current five year period, assuming each of these sites are delivered in full as indicated by the trajectory.

8.25 When accounting for completions in previous years, these 26 sites will deliver 242 gross affordable dwellings over the five-year period, equating to 48²² gross affordable homes per annum.

²¹ 1,607 dwellings – 8 dwellings (5% small sites discount) + 546 dwellings (windfall allowance) = 2,145 dwellings.

²² 242 / 5 years = 48.42 dwellings.

- 8.26 In addition to the on-site delivery, it is important to note that £1,190,942 in off-site affordable housing contributions will be collected from three qualifying sites in the Council's latest 5YHLS in lieu of providing affordable housing on-site.
- 8.27 The published Government consultation (August 2018) on the "*Use of receipts from Right to Buy sales*" (CD10.7, p.9, [18]), which indicated that the cost of building an affordable home in the Midlands²³ to be £132,000. Based on the total of £1,190,942 collected, this would deliver just 9²⁴ additional affordable homes across the five-year period.
- 8.28 Therefore, if the additional affordable homes to be delivered through the commuted payments were also to be delivered within the five-year period, delivery in addition to the 242 gross affordable dwellings in the supply this would total 251 gross affordable dwellings, i.e., a total of 50²⁵ per annum.
- 8.29 It should be noted that these figures fail to take account of losses to affordable housing stock through the Right to Buy. If the losses experienced by St Albans continue at the prevailing average rate over the past five years, it is likely that the Council will lose around 73 affordable dwellings from the supply (see Figure 6.2²⁶), equivalent to 15 losses per annum.
- 8.30 When the effect of these losses is taken account, the Council's supply figure for the next five years falls to 35 affordable dwellings per annum. The future supply of affordable housing in St Albans appears to have collapsed.
- 8.31 Figure 8.4 shows that the projected delivery of 35 net affordable dwellings per annum falls significantly short of the 828 affordable dwellings per annum required by the 2020 LHNA.

²³ I have used the Midlands figure as the consultation does not provide a figure for the East of England.

²⁴ £1,190,942 / £132,000 = 9.02 dwellings.

²⁵ 251 / 5 years = 50.22 dwellings

²⁶ 20 + 12 + 15 + 11 + 15 = 73 / 5 years = 14.6 dwellings pa

Figure 8.4: Projected Affordable Housing Additions Compared to 2020 LHNA Identified Needs

Monitoring Year	Net Affordable Housing Additions		Affordable Housing Need – 2020 LHNA	Shortfall	Cumulative Shortfall
	Actual	Projected			
2020/21	172		828	-656	-656
2021/22	56		828	-772	-1,428
2022/23		35	828	-793	-2,221
2023/24		35	828	-793	-3,014
2024/25		35	828	-793	-3,807
2025/26		35	828	-793	-4,600
2026/27		35	828	-793	-5,393
Total	403		5,796	-5,393	

Source: St Albans City and District Council Authorities Monitoring Reports (2014 to 2022); DLUHC Live Tables 691 and 693c2; Private Registered Provider Social Housing Stock in England Statistical Data Returns; and 2020 LHNA

- 8.32 The Council's future supply figure derived from the analysis also fall substantially short of the 1,114 per annum figure required when back log needs are addressed in the first five years, in line with the Sedgfield approach.
- 8.33 More strikingly, even if every single dwelling included in the Council's latest 5YHLS i.e., 2,145²⁷, were to be delivered over the five year period as affordable dwellings, this would not come close to meeting the minimum affordable housing need of 4,140²⁸ dwellings. The situation is even worse when compared to the backlog need figure of 5,570 dwellings for the period.
- 8.34 Evidently, this Council is not seeking in any meaningful way to boost the supply of affordable housing, based on the analysis of the available sites in the 5-year supply.
- 8.35 Consequently, I have no confidence that the Council can see a sufficient step change in the delivery of affordable housing to meet annual needs. This makes it even more important that suitable sites, such as the appeal site, are granted planning permission now in order to boost the supply of affordable housing.

²⁷ 1,607 dwellings – 8 dwellings (5% small sites discount) + 546 dwellings (windfall allowance) = 2,145 dwellings

²⁸ 828 x 5 years = 4,140

Conclusions on Future Affordable Housing Supply

- 8.36 In light of the Council's poor record of affordable housing delivery, the volatility of future affordable housing delivery and the level of affordable housing needs identified there can be no doubt that the provision of up to 60 affordable dwellings on this site to address the district-wide needs of St Albans should be afforded **very substantial weight**²⁹ in the determination of this appeal.

²⁹ As agreed with the council in the main Statement of Common Ground (CD8.3, p.16, [6.50])

Council's Assessment of the Application and Appeal Proposals

Section 9

Committee Report

9.1 The application was refused on 25 May 2023 (**CD6.2**) at Planning Committee, also on 25 May 2023. The Committee Report can be seen under **CD6.1** which recommended the application for refusal.

9.2 Paragraph 6.24.1 of the Committee Report outlines the St Albans Housing Department comments received on 13 September 2022 which states that:

“The Housing department has no specific comment on the outline application seeking access but notes the proposed provision of a policy compliant level of affordable housing but awaits further details on the size and tenure of this housing and welcomes further discussion on this matter.”

9.3 Section 8.7 discusses the provision of Housing, including Affordable Housing and Self-Build Housing. Paragraph 8.7.3 explains that the provision of housing weighs heavily in favour of the proposals. Paragraph 8.7.4 goes on to explain that:

“How much weight is a matter of planning judgement, informed by material considerations. In this regard, the recent appeal decision at Bullens Green Lane (5/2020/1992) is a relevant consideration. This decision was issued on 14 June 2021 and therefore considers a very similar housing and affordable housing position in the District as applies to the application considered in this report.”

9.4 Paragraph 8.7.5 outlines the appeal decision (**CD14.6, p.12, [54]**) in more detail, where Tetlow King Planning gave evidence on affordable housing matters:

“The persistent under delivery of affordable housing in both local authority areas presents a critical situation. Taking into account the extremely acute affordable housing position in both SADC and WHBC, I attach very substantial weight to the delivery of up to 45 affordable homes in this location in favour of the proposals.”
(My emphasis).

Paragraph 8.7.6 sets out in respect of the application proposals the Council attach ‘very substantial weight’ to the delivery of market and affordable housing.

St Albans City and District Council Statement of Case

- 9.5 The Council submitted their Statement of Case (“SoC”) in respect of the appeal proposals to the Planning Inspectorate on 19 July 2023 which can be viewed under **CD7.2**.
- 9.6 Section 5 sets out the Council’s case and paragraph 5.56 under the heading ‘other issues’ (page 19) explains that the scheme fails to include a satisfactory mechanism to secure the affordable units. However, it goes on to explain that it has been agreed between the parties that a Section 106 can address this issue.
- 9.7 Section 6 sets out ‘The Appellants Other Considerations under NPPF paragraph 148’. Paragraph 6.4 confirms that it is common ground between the parties that the provision of both market and affordable housing carry ‘very substantial weight in the planning balance’.

Statements of Common Ground

- 9.8 The council have agreed at paragraph 6.50 of the main Statement of Common Ground (**CD8.3, p.16, [6.50]**) that:

“It is agreed there is an acute need for more affordable housing within St. Albans, and the delivery of 60 much needed affordable units (40%), which exceeds the minimum SPD requirement of 35% and reflects the emerging Policy requirement in the Regulation 18 Local Plan, represents a social benefit to which very substantial weight should be given. The Appellant intends to agree a separate Affordable Housing Statement of Common Ground with the Council.” (My emphasis).

- 9.9 Similarly in the Affordable Housing Statement of Common Ground (**CD8.1**) the council have agreed that there is an acute national housing crisis (**p.14, [10.15]**) and that there is an acute need for affordable housing across SACDC and annual needs are far greater than what has been provided to date (**p.14, [10.16]**).

Conclusion

- 9.10 The Appellants and the Council are in agreement that there is an acute need for more affordable housing within St Albans and that the provision of up to 60 affordable units at the appeal site represents a social benefit which should individually be attributed **very substantial weight** in the planning balance.

Rule 6 Party Assessment of the Appeal Proposals

Section 10

10.1 Colney Heath Parish Council have been granted Rule 6 Party status as part of the planning appeal, providing their Statement of Case (**CD7.3**) to the Planning Inspectorate on 25 July 2023 which outlines their reasons for opposing the appeal proposals.

10.2 Section 3.09 of the Rule 6 Party Statement of Case outlines that:

“The Colney Heath Parish Council agree and support the need for genuinely affordable housing and the need for such housing within the district. However, as legally defined affordable housing is not affordable to many local families it does not assist in meeting St Albans housing need.”

10.3 In contrast to this statement, it is important to highlight a March 2021 appeal decision in East Malling (**CD14.18, p.14, [68]**) where the Inspector concluded that affordable housing which meets the NPPF definition should be considered affordable regardless of existing market conditions:

*“I note comments from some local residents who dispute that the proposed affordable housing is genuinely affordable. The legal agreement which accompanies the application uses a definition of affordable housing, including affordable housing for rent **which is in line with the definition of that in the National Planning Policy Framework.** I am therefore satisfied that this would ensure that such housing is genuinely provided at rent levels significantly below the market rent for the area.” (My emphasis).*

10.4 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 (**CD14.19, p.17, [78-79]**) in January 2022.

- 10.5 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).*

- 10.6 With the above in mind, it is important to reiterate that the 2022 median house price in Colney Heath Ward is £579,750 which is 82% higher than the East of England average of £318,275 and 115% higher than the national figure of £270,000. It is therefore clear that the appeal site is in a high value area³⁰ which increases the importance of providing affordable tenures such as the up 60 affordable homes proposed at the appeal site.
- 10.7 At paragraph 3.09 the Rule 6 Party have also sought to claim that the appeal site’s rural location is unsustainable and therefore, unsuitable for the provision of affordable housing. The sustainability of the appeal site is a separate matter and is dealt with in the Highway’s Evidence³¹ of Ian Dimbylow (RPS Group). This issue has no bearing on the need for affordable housing in St Albans District nor Colney Heath and does not diminish the weight attributed to the proposed affordable units.

³⁰ See Section 7 of this evidence for further details

³¹ CD9.4

- 10.8 Despite the Rule 6 Party's claims that the proposed affordable units will not be genuinely affordable, the following analysis demonstrates that each of the proposed affordable housing tenures at the appeal site are in fact affordable to a range of household types on lower quartile incomes.
- 10.9 It should also be noted that the Rule 6 party do not give a view on the weight that should be attributed to the provision of affordable housing at the appeal site.

Household Incomes

- 10.10 It is commonly accepted that affordability should be assessed on gross household income rather than individual incomes. This approach was also agreed between the appellants and the council at the Chiswell Green Inquiry held in April 2023.
- 10.11 The 2021/22 English Housing Survey found that 38% of first time buyer households were couples without dependent children and 24% were couples with dependent children. Similarly, the Council's own Housing Allocations Policy (**CD10.8, p,34**) determines eligibility on combined household income. ONS³² themselves recognise this approach stating:

"Household income estimates, [...] are a better reflection of the mortgage a household could obtain than individual earnings are³³."

- 10.12 It is therefore reasonable to assume that most first time buyers will be couples. Paragraph 5.53 of the 2020 LHNA (**CD10.2, p,79**) is clear that in respect of owner occupation affordability the assessment has assumed that *"a household has a 10% deposit and can secure a mortgage for four and a half times their salary"*. I have applied these assumptions in my subsequent analysis.
- 10.13 Figure 10.1 below seeks to understand the maximum mortgage available for a two person household earning a gross lower quartile salary, using 4.5x income multipliers as set out in the 2020 LHNA. It identifies the combined income for a couple by multiplying the gross lower quartile earnings in 2022 for St Albans by two.

³² Office for National Statistics

³³ Office for National Statistics, Housing Purchase Affordability, Great Britain: 2021

Figure 10.1: Lower Quartile Household Incomes

Lower Quartile Individual Income	Combined Household Income	Maximum Mortgage
£26,015	£26,015 x 2 = £52,030	£52,030 x 4.5 = £234,135

Source: ONS Ratio of House Price to Work-place Based Earnings.

10.14 Figure 10.1 demonstrates that a two person household earning a gross lower quartile salary of £26,015 per annum would equate to a combined household income of £52,030. A combined household income of £52,030 per annum would allow for a maximum mortgage of £234,135, subject to affordability checks.

Shared Ownership Affordability

10.15 In order to understand the affordability of a Shared Ownership property at the appeal site it is important to understand the eligibility criteria for such a property and how the sale price is calculated in line with national guidance. This information is set out in Figure 10.2 below.

Figure 10.2: Shared Ownership Sale Price and Eligibility Criteria

Shared Ownership Eligibility Criteria	
Sale Price	Open Market Value at point of sale.
Eligibility	<ul style="list-style-type: none"> Combined annual household income must not exceed £80,000.
Finance Options	Minimum purchase is 10% share in a property and minimum deposit is 5% of the price of that share, rather than the whole property. Rent paid on the remaining share is charged at a discounted rate (usually 2.75% of the property value per year). Minimum staircasing increment of 1%.
Stamp Duty	Typically deferred until 80% share is held.

Source: Government Capital Funding Guide (April 2022).

10.16 Figure 10.3 below estimates the cost of a Shared Ownership property at the appeal site by using the median house price in 2022 for Colney Heath Ward of £579,750 as a proxy for the sale price.

Figure 10.3: Shared Ownership Estimated Cost

Shared Ownership Estimated Cost	
Property Value	£579,750 (median house price in 2022 for Colney Heath Ward)
Deposit	10% share = £57,975 5% deposit = £2,898.75
Minimum income	£57,975 - £2,898.75 = £55,076.25 £55,076.25 / 4.5 = £12,239.17

Source: Government Capital Funding Guide (April 2022); and ONS HPSSA Datasets.

10.17 Assuming a property value of £579,750 a minimum purchase share of 10% and a minimum deposit of 5% of the price of that share, Figure 10.3 calculates a minimum household income of £12,239.17 is required to access a mortgage for a Shared Ownership property at the appeal site, when using 4.5x income multipliers.

10.18 When this figure is viewed in context of a lower quartile household income of £52,030 per annum it is evident that the Shared Ownership properties at the appeal site would be affordable to those on low incomes in the district. It is also notable that a single person earning a lower quartile salary of £26,015 per annum would also be able to afford one of these properties.

First Home Affordability

10.19 In order to understand the affordability of a First Home property at the appeal site it is important to understand the eligibility criteria for such a property and how the sale price is calculated in line with national guidance. This information is set out in Figure 10.4 below.

Figure 10.4: First Home sale price and eligibility criteria

First Home Criteria	
Sale Price	At least 20% of Open Market Value Capped at £250,000 (including discount)
Eligibility	<ul style="list-style-type: none"> • Combined annual household income must not exceed £80,000. • Must be First Time Buyer.
Finance Options	Must have a mortgage or home purchase plan (if required to comply with Islamic law) to fund a minimum of 50% of the discounted purchase price.
Stamp Duty	No stamp duty required as exempt (per FH PPG) and under £250,000.

Source: First Homes Planning Practice Guidance (23 December 2021).

10.20 Figure 10.5 below estimates the cost of a First Home property at the appeal site assuming the maximum sale price of £250,000 as set out in the First Homes PPG³⁴.

Figure 10.5: First Home Estimated Cost

First Home Estimated Cost	
Property Value	£250,000 (max sale value)
Deposit	10% deposit = £25,000
Minimum income	£250,000 - £25,000 = £225,000 £225,000 / 4.5 = £50,000

Source: First Homes Planning Practice Guidance (23 December 2021).

10.21 Assuming a maximum property value of £250,000, and a minimum deposit of 10%, Figure 10.5 calculates a minimum household income of £50,000 is required to afford a First Home property at the appeal site, when using 4.5x income multipliers.

10.22 When this figure is viewed in context of a lower quartile household income of £52,030 per annum it is evident that the First Home properties at the appeal site would be affordable to a couple (each earning lower quartile incomes) in the district. It should however be noted that a single person earning a lower quartile salary of £26,015 per annum would not be able to afford one of these properties.

Affordable Rent Eligibility

10.23 In order to be eligible for the affordable rented properties at the appeal site, applicants must meet the eligibility criteria set out in the Council’s Housing Allocation Policy.

10.24 The Council published its latest Housing Allocations Policy in December 2021 (**CD10.8, p.34**). Section 12 of the document sets out the “Financial Assessment” criteria for applicants which stipulates combined gross household income limits by property size, which are replicated in Figure 10.6 below.

10.25 The document is also clear that: *“The amounts permitted reflect gross household income, including adult children aged 18 and over that are included as part of the application”* and that *“Applicants with savings over £16,000 will not qualify to register for housing except in exceptional circumstances”*.

³⁴ Paragraph: 002 Reference ID: 70-002-20210524

Figure 10.6: Gross Household Income Limits

Property Size	Gross Household Income Limit
1 bed property	£36,295
2 bed property	£48,173
3 bed property	£56,152
4 bed property	£69,608

Source: St Albans City and District Housing Allocations Policy (December 2021)

10.26 When Figure 10.6 is viewed in context of the lower quartile household income of £52,030 it is notable that the combined income exceeds the gross household income limit for 1 and 2 bed properties. As such these households would not be eligible for the affordable rented properties at the appeal site but would however be able to afford the Shared Ownership and First Home properties.

10.27 On the other hand whilst a single person earning a lower quartile salary of £26,015 per annum would not be able to afford a First Home property, they would be eligible for 1 and 2 bed affordable rented properties. As previously noted, a single person earning a lower quartile salary would also be able to afford a Shared Ownership property.

Affordability Summary

10.28 The eligibility/affordability for the range of household types identified in the above analysis in respect of the range of affordable tenures proposed at the appeal site is summarised in Figure 10.7 below.

Figure 10.7: Household Eligibility

Household Type	Tenure Type		
	Shared Ownership	First Home	Affordable Rent
Single Person Household	Yes	No	Yes
Two Person Household	Yes	Yes	No

Source: Government Capital Funding Guide (April 2022); First Homes Planning Practice Guidance (23 December 2021); St Albans City and District Housing Allocations Policy (December 2021); and ONS HPSSA Datasets.

10.29 The above analysis demonstrates that the proposed affordable properties at the appeal site would be affordable to a range of household types on low incomes.

Conclusion

- 10.30 The above calculations clearly demonstrate that the proposed affordable units will be affordable for a range of households in need of such tenures. However, as previously noted, this analysis does not prejudice the fact any affordable tenure which meets the NPPF Annex 2 definition of affordable housing should be treated as such regardless of market conditions.
- 10.31 Understanding each of the points made by the Rule 6 Party, I do not consider that they have sufficiently assessed the substantial benefits, such as affordable housing, that the scheme would achieve.
- 10.32 It is clear that the Rule 6 Party have deliberately sought to downplay the provision of up to 60 affordable homes at the appeal site. It is my view (and the Council's³⁵) that affordable housing is a benefit of the appeal proposals which should be afforded **very substantial weight** in the determination of this appeal.

³⁵ As agreed with the council in the main Statement of Common Ground (CD8.3, p.16, [6.50])

Benefits of the Proposed Affordable Housing at the Appeal Site

Section 11

- 11.1 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.
- 11.2 As set out in Section 3 of this evidence there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. St Albans City and District Council is no exception to this.
- 11.3 The appeal scheme will provide up to 60 affordable dwellings on site comprising 25% First Homes (15 units), 8% Shared Ownership (5 units) and 67% Affordable Rented (40 units). The wider social and economic benefits of affordable housing per se are commonly recognised.
- 11.4 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

Affordable Rent

- 11.5 Affordable rented units are a tenure of affordable housing that are exclusively provided by housing associations (not-for-profit organisations that own, let, and manage rented housing) or a local council. Affordable rented tenants rent the property from the housing association or council, who act as landlord.
- 11.6 Annex 2 of the NPPF (2021) is clear that for rented affordable housing products “*the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable)*” (my emphasis).
- 11.7 The Government’s current policy for affordable rent is set out in the April 2020 Rent Standard, which has been in force since 1 April 2020.
- 11.8 The Rent Standard (2020) sets out that where Affordable Rent is being charged, the maximum rent inclusive of service charge for a new tenant under a new tenancy is 80% of the market rent for the tenant’s accommodation.

- 11.9 Footnote 7 of the Rent Standard is clear that “Market Rent” in relation to accommodation means *“an estimate of its market rent inclusive of all service charges at the time the tenancy is granted that is based on a valuation in accordance with a method recognised by the Royal Institution of Chartered Surveyors.”*
- 11.10 The Rent Standard also sets out a 'formula rent' for each property to be let as an affordable rented unit, which is calculated based on the relative value of the property, the size of the property and relative local income levels.
- 11.11 If the formula rent is higher than 80% of the weekly market rent (inclusive of service charges) for the tenant's accommodation, the maximum weekly rent is charged using the formula rent calculation.
- 11.12 The amount of affordable rent a person pays therefore depends on the location and size of the property. Annual rent increases are capped at the Consumer Prices Index (“CPI”) +1% as well as rent caps.
- 11.13 It should also be noted that the Government is currently consulting on a rent cap on social housing to protect millions of tenants from rising cost of living. The consultation opened on 31 August 2022 and closed on 12 October 2022.
- 11.14 Following the consultation period, the Secretary of State will direct the Regulator of Social Housing on rent standards, confirming the maximum amount social housing landlords can increase rents by for 1 April 2023 to 31 March 2024.
- 11.15 The government website for the consultation states that:
- “The move would prevent rents for council and housing association houses from rising significantly, saving tenants an average £300 per year and providing stability as inflation rises.”*
- 11.16 The page also provides the following comments from former Housing Secretary Greg Clark:
- “We must protect the most vulnerable households in these exceptional circumstances during the year ahead. Putting a cap on rent increases for social tenants offers security and stability to families across England.*
- We know many people are worried about the months ahead. We want to hear from landlords and social tenants on how we can make this work and support the people that need it most.”*

11.17 As such affordable rented affordable homes will typically “help” those most in need of assistance with their housing needs.

11.18 The Government provided their response to the consultation on 14 December 2022. Paragraph 61 of the response explains that the Government believes it is right to set a lower ceiling on social housing rent increases in 2023/24. Paragraphs 64-65 state that:

“Having carefully considered the responses to the consultation, the government has decided that a 7% ceiling would strike an appropriate balance between protecting social tenants from high rent increases, and ensuring that Registered Providers are able to invest in new and existing social housing and provide decent homes and services to tenants.

We estimate that the average social housing rent will be £200 lower per annum in 2023-24 as a result of the 7% ceiling, compared to if rents increased by 11.1%.”

11.19 Paragraph 95 concludes that the Government will consult in 2023 on a social housing rents policy post 2025.

Shared Ownership

11.20 Shared Ownership units are a tenure of affordable housing where first time buyers, and those that do not currently own a home are given the opportunity to purchase a share in a new build or resales property.

11.21 Shared ownership schemes are provided by housing associations or private developers. The details, costs and restrictions involved can vary by provider.

11.22 Annex 2 of the NPPF (2021) is clear that affordable routes to home ownership (including Shared Ownership) “*is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market*” and is set “*at a price equivalent to at least 20% below local market value*”.

11.23 The Governments April 2022 Capital Funding Guide sets out that the cost of a Shared Ownership property should be calculated using the full market value of the property at the point of initial sale.

11.24 The main benefit of Shared Ownership properties is that people can start by buying as little as 10% share in a property and deposit can be 5% of the price of that share, rather than the whole property.

- 11.25 The rent paid on the remaining share is charged at a discounted rate (usually 2.75% of the property value per year). In addition, stamp duty can generally be deferred until you increase your share of the property to 80%.
- 11.26 With Shared Ownership, it is possible to buy more of the home by “staircasing” i.e., increasing the share. Shares can be bought in 1% increments, which will in turn reduce rent paid.

First Homes

- 11.27 First Homes is a discounted market sale housing tenure type which is designed to meet the needs of a sub-sector of the community who are in need of homes, but for a variety of reasons do not qualify for other tenure types of affordable homes.
- 11.28 The First Homes scheme is designed to allow people to get on the housing ladder in their local area, and in particular to ensure that key workers are able to buy homes in the areas where they work.
- 11.29 The First Homes criteria are the minimum requirements a housing unit must meet in order to qualify as a First Home:

“a) a First Home must be discounted by a minimum of 30% against the market value;

b) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London); and,

c) the home is sold to a person who meets the First Homes eligibility criteria, as set out in the first 2 paragraphs under First Homes eligibility criteria.”

(PPG, Paragraph: 001 Reference ID: 70-001-20210524)

- 11.30 Homes meeting the above minimum criteria can be sold as First Homes and are considered to meet the definition of ‘affordable housing’ as laid out in Annex two of the NPPF.
- 11.31 In order to ensure First Homes are provided for those households who are most in need, First Homes are subject to the following eligibility criteria:
- A purchaser of a First Home must be a first-time buyer;
 - Purchasers of First Homes, whether individuals, couples, or group purchasers, should have a combined annual household income of less than £80,000 (or £90,000 in London); and

- Purchasers must be able to get a mortgage to fund a minimum of 50% of the discounted purchase price.

11.32 The local council may also set some additional eligibility conditions. Some councils may prioritise giving First Homes discounts to essential workers, people who already live in the area and/or those on lower incomes. Members of the Armed Forces and recent veterans (within five years of service) do not need to meet any local connection or key worker requirements set by local authorities.

11.33 A section 106 agreement securing the necessary restrictions on the use and sale of the property and a legal restriction on the title of the property ensures that the above restrictions are applied to the property at each future sale.

11.34 There is extensive support from the government in respect of enabling home ownership which has culminated in the introduction of First Homes as an affordable tenure.

11.35 The introduction of this tenure will strengthen and increase the delivery of Discount Market Homes, as set out in Annex two of the NPPF.

Benefits of the proposed Affordable Housing at the appeal site

11.36 The appeal proposals provide an affordable housing contribution (40%) which exceeds the Affordable Housing Supplementary Planning Guidance (2004) minimum requirement of 35%³⁶; 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. It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or needed in mitigation.

11.37 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD14.14, p.14, [72]**) in September 2018 who was clear at paragraph 72 of their decision that:

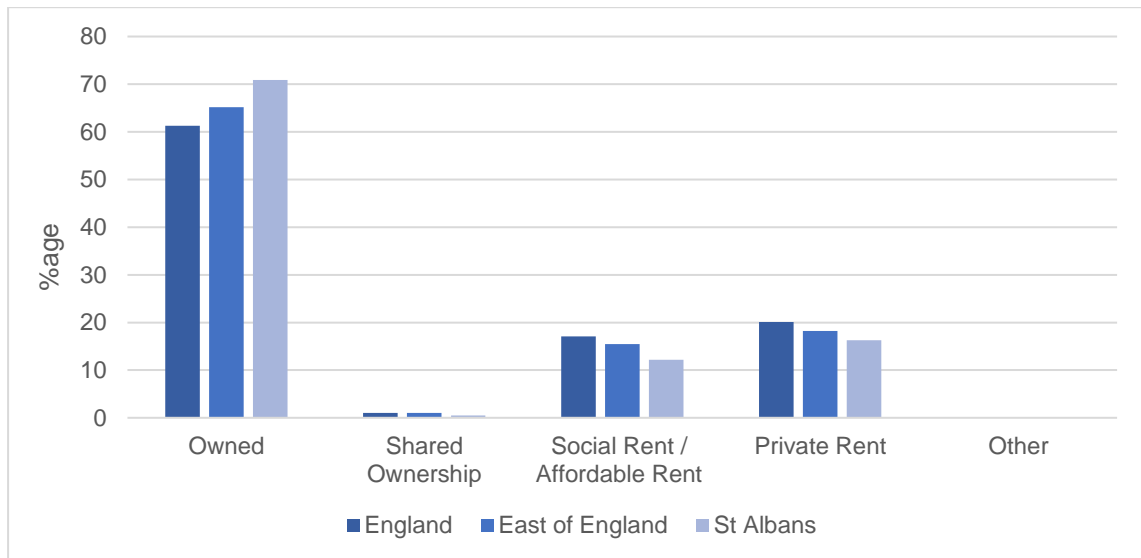
“On the other hand, in the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance

³⁶ which relates to Policy 7A of the Local Plan Review (1994)

as here, when others have only achieved partial compliance, would be a considerable benefit". (My emphasis).

11.38 Figure 11.1 below illustrates the breakdown of tenures within the East of England and St Albans compared with that nationally and regionally at the time of the 2021 Census.

Figure 11.1: Tenure Comparison



Source: Census 2021 data set TS054

11.39 Figure 11.1 clearly shows that at the time of the 2021 Census, owner occupation was by far the most common tenure in the East of England region (65.2%) and St Albans District (70.0%). It is notable that owner occupation is much more prevalent in St Albans than across the region and nationally.

11.40 When understanding the composition of the remaining housing stock in these areas, Shared Ownership properties are by far the most uncommon, representing just 0.5% across St Albans (297 dwellings), compared to 1% of stock nationally and regionally

11.41 This should be viewed in context of the fact that at the time of the 2011 Census³⁷ 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.

11.42 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.

³⁷ Source: Census 2011 data set KS402EW

11.43 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.

11.44 The affordable housing benefits of the appeal scheme are therefore:

- Policy enhanced offer of 40% (up to 60 dwellings) of the scheme provided as affordable housing;
- An addition of up to 15 First Homes affordable dwellings;
- An addition of up to 5 Shared Ownership homes;
- An addition of up to 40 Affordable Rented homes;
- 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 insulation³⁸; and
- Greater security of tenure than the private rented sector.

11.45 In my opinion these benefits are very substantial and a strong material consideration weighing heavily in favour of the proposal.

³⁸ Watt a Save by HBF – October 2022.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 12

- 12.1 There is a wealth of evidence to demonstrate that there is a national housing crisis³⁹ in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 12.2 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.
- 12.3 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 one through which urgent action must be taken to deliver more affordable homes.

Affordable Housing Offer

- 12.4 **Vistry Homes Limited** proposes the development of up to 150 dwellings, of which 40% (up to 60 dwellings) are to be provided on-site as affordable housing at Land to the rear of 42-100 Tollgate Road, Colney Heath, St Albans, Hertfordshire.
- 12.5 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.
- 12.6 The proposed tenure split will be 25% First Homes (15 units), 8% Shared Ownership (5 units) and 67% Affordable Rented (40 units) which meets the council's requirement of a ratio of 2:1 affordable rented housing to shared ownership housing⁴⁰.
- 12.7 The proposed affordable housing will be secured by way of a Section 106 planning obligation.

³⁹ As agreed with the council in the Affordable Housing Statement of Common Ground (CD8.1, p.15, [10.15])

⁴⁰ As agreed at paragraph 10.1 of the Affordable Housing Statement of Common Ground (CD8.1, p.13)

Local Policy Position

- 12.8 The adopted Development Plan for St Albans City and District Council currently comprises the St Albans District Local Plan Review (1994).
- 12.9 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

- 12.10 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.
- 12.11 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.
- 12.12 These affordable housing need figures have been agreed with the Council in the Affordable Housing Statement of Common Ground (**CD8.1, p.13, [10.2-10.3]**).

Affordable Housing Delivery

- 12.13 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 14% of overall housing delivery, equating to just 55 affordable dwellings per annum.
- 12.14 A shortfall of -5,053 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.
- 12.15 Against the most recent assessment of affordable housing need in St Albans, a shortfall of -1,428 affordable dwellings has arisen in the two first years of the 2020 LHNA period, which estimated a need 828 affordable dwellings per annum between 2020 and 2036.
- 12.16 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

12.17 In addition to the persistent shortfalls in affordable housing delivery against objectively assessed needs other indicators further point to an affordability crisis in St Albans.

12.18 Set out below are the key findings in respect of affordability across St Albans City and District:

Housing Need

- On 31st March 2023 there were 641 households on the council's Housing Register. This represents a 15% increase in a single year from 559 households on 31 March 2022 (which itself was a 4% increase from 538 households on 31 March 2021).
- As of 12 April 2023, there were 303 households who specified a preference for an affordable home in Colney Heath Civil Parish.
- On 31 March 2023 the wait to be housed in an affordable home within St Albans ranged from 1.44 years for a 2-bed affordable home through to 2.57 years for a 4-bed+ affordable home.
- Between 1 April 2022 to 31 March 2023 there were an average of 34 bids per 1-bed affordable dwelling put up for let in Colney Heath Civil Parish, 39 average bids per 2-bed affordable dwelling and 80 average bids per 3-bed affordable dwelling, and 95 bids per 4+ bed affordable dwelling.
- Over the 2022/23 monitoring period there were just 19 social housing letting in Colney Heath Civil Parish.
- As of 27 March 2023, 776 households were seeking a shared ownership home in St Albans.
- On 31 March 2023 114 households were housed in temporary accommodation within the St Albans region and an additional 3 households housed in temporary accommodation outside the St Albans region.
- In the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 206 households in need of homelessness prevention duty, and a further 110 households in need of relief duty from the Council.

Private Rents

- 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.

House Prices

- In 2022 the ratio of median house prices to median incomes in St Albans stood at 18.44, a 32% increase since the start of the 2016 SHMA period in 2013 where it stood at 13.92.
- A median ratio of 18.44 in St Albans stands substantially above the national average of 8.28 (+123%) and significantly the East of England average of 10.08 (+83%).
- In the 12-month period between March 2021 and March 2022 the median house price to income ratio across St Albans has increased by 9% from 17.63 to 18.44.
- The median house price across Colney Heath Ward has risen by 55% from £375,000 in 2013 to £579,750 in 2022. This compares to a 63% increase across St Albans, a 63% increase across the East of England and a national increase of 46% over the same period.
- In 2022 median house prices in Colney Heath (£579,750) were comparable with St Albans (£590,000), 82% higher than across the East of England (£318,275) and 115% higher than the national figure (£270,000).
- In 2022 the ratio of lower quartile house price to incomes in St Albans stood at 16.53, a 25% increase since the start of the 2016 SHMA period in 2013 where it stood at 13.23.

- 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%).
- The lower quartile house price across Colney Heath Ward has risen by 64% from £290,000 in 2013 to £475,000 in 2022. This compares to a 60% increase across St Albans, a 62% increase across the East of England and a national increase of 44% over the same period.
- In 2022 lower quartile house prices in Colney Heath Ward (£475,000) were 14% higher than across St Albans (£415,000), 102% higher than across the East of England (£235,000) and 164% higher than the national figure (£180,000).

12.19 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Colney Heath Ward as well as across St Albans more generally.

12.20 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).

Future Supply of Affordable Housing

12.21 It is imperative that the -1,428 dwelling affordable housing shortfall accumulated since 2020/21 in St Albans is addressed as soon as possible and in any event within the next five years⁴¹.

12.22 When the shortfall is factored into the 2020 LHNA identified need of 828 affordable homes per annum, the number of affordable homes the Council will need to complete substantially increases to 1,114 net affordable homes per annum for the period 2022/23 to 2026/27.

12.23 This would ensure that for the remainder of the period up to 2036 the annual affordable housing need returns to 828 per annum to deal solely with newly arising needs.

12.24 The Council's latest Five Year Housing Land Supply ("5YHLS") position, covering the period 1 April 2022 to 31 March 2027, is contained within its Authority's Monitoring Report (**CD10.3 p.31, [3.12]**) published in February 2022.

⁴¹ As agreed with the council in the Affordable Housing Statement of Common Ground (**CD8.1, p.14, [10.9]**)

- 12.25 When the effect of Right to Buy losses is taken account, the Council's supply figure for the next five years equates to 35 net affordable dwellings per annum⁴². The projected delivery of 35 net affordable dwellings per annum falls significantly short of the 828 affordable dwellings per annum required by the 2020 LHNA.
- 12.26 The Council's future supply figure derived from the analysis also fall substantially short of the 1,114 per annum figure required when back log needs are addressed in the first five years, in line with the Sedgefield approach.
- 12.27 The future of affordable housing supply in St Albans looks bleak with likely delivery being well below the current annual average. It is fair to say based on evidence that the future supply of affordable housing appears to have collapsed. This merely serves to further compound the acute affordability problems that St Albans is facing.

Consequences of Failing to Meet Affordable Housing Needs

- 12.28 The consequences of failing to meet affordable housing needs in any local authority are significant. 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.
- 12.29 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. 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.

⁴² As agreed with the council in the Affordable Housing Statement of Common Ground (CD8.1, p.14, [10.12])

Relevant Secretary of State and Appeal Decisions

- 12.30 The importance of affordable housing as a material consideration has been reflected in several Secretary of State (“SoS”) and appeal decisions.
- 12.31 Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance⁴³. A collection of such decisions can be viewed at **Appendix AG6**.
- 12.32 Brief summaries of appeal decisions relevant to this appeal are summarised at **Appendix AG7**.
- 12.33 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 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.

Summary and Conclusion

- 12.34 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 St Albans.
- 12.35 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. 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 and rising.
- 12.36 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.

⁴³ As agreed with the council in the Affordable Housing Statement of Common Ground (CD8.1, p.15, [10.7])

12.37 The affordable housing benefits of the appeal scheme are therefore:

- Policy enhanced offer of 40% (up to 60 dwellings) of the scheme provided as affordable housing;
- An addition of up to 15 First Homes affordable dwellings;
- An addition of up to 5 Shared Ownership homes;
- An addition of up to 40 Affordable Rented homes;
- 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.

12.38 Considering the authority's past poor and lamentable record of affordable housing delivery and high and rising numbers of households on the housing register, it is my view (and the Councils⁴⁴) that the provision of up to 60 affordable dwellings on this site should be afforded **very substantial weight** in the determination of this appeal.

⁴⁴ As agreed with the council in the main Statement of Common Ground (CD8.3, p.16, [6.50])