

Summary 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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OUR REF: M23/0314-06.RPT

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Introduction

Section 1

- 1.1 My name is **Annie Gingell** and my credentials as an expert witness are summarised as follows: I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development from Cardiff University (2020).
- 1.2 I am a member of the Royal Town Planning Institute. I have over 9 years' professional experience in the field of town planning and housing. I have previously been employed by a Local Authority in the South West and have been in private practice since 2017. I have been employed at Tetlow King Planning Ltd for the past 6 years.
- 1.3 My Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision¹ in light of evidence of need in the area. It should be read alongside the main Planning Evidence (**CD9.6**) of Oliver Bell (Nexus Planning).
- 1.4 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.
- 1.5 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.
- 1.6 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 housing².
- 1.7 As part of my evidence, I have sought data, upon which I rely, from the Council through a Freedom of Information ("FOI") request. Partial responses were received on 11 May 2023 and 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 For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial and very substantial.

² As agreed at paragraph 10.1 of the Affordable Housing Statement of Common Ground (**CD8.1, p.13**)

Affordable Housing Evidence

Section 2

Introduction

- 2.1 My Proof of Evidence deals specifically with affordable housing and my consideration of the degree of weight which I believe should be applied in the context of the acute need and the poor level of affordable housing that has been delivered in St Albans.
- 2.2 There is a wealth of evidence to demonstrate that there is a national housing crisis³ in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 2.3 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 2.4 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

- 2.5 **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.
- 2.6 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.
- 2.7 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 housing⁴.

³ As agreed with the council in the Affordable Housing Statement of Common Ground (CD8.1, p.15, [10.15])

⁴ As agreed at paragraph 10.1 of the Affordable Housing Statement of Common Ground (CD8.1, p.13)

- 2.8 The proposed affordable housing will be secured by way of a Section 106 planning obligation.

Local Policy Position

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

Affordable Housing Needs

- 2.11 The 2016 SHMA identified an objectively assessed need for 14,191 net affordable homes between 2013 and 2036, equivalent to an estimated annual need of 617 affordable homes across St Albans.
- 2.12 The most recent report, the 2020 LHNA, identified an objectively assessed need for 13,248 net affordable homes between 2020 and 2036, equivalent to an estimated annual need of 828 affordable homes across St Albans.
- 2.13 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

- 2.14 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.
- 2.15 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.
- 2.16 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.
- 2.17 Given the recognised shortfalls in affordable housing delivery across St Albans, the appeal proposals provide an affordable housing contribution which would contribute significantly towards addressing this key corporate priority.

Affordability

- 2.18 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.
- 2.19 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).

2.20 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.

2.21 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

2.22 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 years⁵.

2.23 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.

2.24 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.

2.25 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.

⁵ As agreed with the council in the Affordable Housing Statement of Common Ground (**CD8.1, p.14, [10.9]**)

- 2.26 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 annum⁶. 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.
- 2.27 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.
- 2.28 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

- 2.29 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.
- 2.30 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.

⁶ 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

- 2.31 The importance of affordable housing as a material consideration has been reflected in several Secretary of State (“SoS”) and appeal decisions.
- 2.32 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 balance⁷. A collection of such decisions can be viewed at **Appendix AG6**.
- 2.33 Brief summaries of appeal decisions relevant to this appeal are summarised at **Appendix AG7**.
- 2.34 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

- 2.35 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.
- 2.36 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.
- 2.37 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.
- 2.38 The affordable housing benefits of the appeal scheme are therefore:

⁷ As agreed with the council in the Affordable Housing Statement of Common Ground (CD8.1, p.15, [10.7])

- 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.

2.39 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 Councils⁸) that the provision of up to 60 affordable dwellings on this site should be afforded **very substantial weight** in the determination of this appeal.

⁸ As agreed with the council in the main Statement of Common Ground (CD8.3, p.16, [6.50])