

Summary Affordable Housing Proof of Evidence of James Stacey BA (Hons) Dip TP MRTPI

Land South of Shenley Hill, Radlett, Hertfordshire

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Erection of up to 195 new homes (45% affordable), safeguarded land for the expansion of Newberries Primary School and provision of a new medical centre, along with associated access. Outline application to include the matter of ACCESS (with the following matters reserved: appearance, landscaping, layout and scale).

Land South of Shenley Hill, Radlett, Hertfordshire

Fairfax Properties

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LPA REF: 22/1539/OUT

OUR REF: M23/0307-03.RPT

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Introduction

Section 1

1.1 My name is **James Stacey BA (Hons) Dip TP MRTPI** and my credentials as an expert witness are summarised as follows:

- I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England (“UWE”) (1997). I am a member of the Royal Town Planning Institute (“RTPI”).
- I have over 28 years’ professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and have been in private practice since 2001.
- During my career, I have presented evidence at more than 110 Section 78 appeal inquiries and hearings. I act for a cross-section of clients and advise upon a diverse range of planning and housing related matters.
- In December 2022 I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.
- 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.

1.2 My Proof of Evidence examines the affordable housing need in Hertsmere Borough and considers the weight to be attributed to affordable housing in the overall planning balance.

1.3 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 Hertsmere Borough Council on 19 May 2023 and a full response was received on 25 May 2023.

- 1.4 Further FOI data from March 2023 and December 2022 was obtained as part of previous appeal work in Hertsmere Borough. The full FOI correspondence is attached at **Appendices JS2a and JS2b**.
- 1.5 It is important to highlight that an Affordable Housing Statement of Common Ground (“SoCG”) was agreed on 9 May 2023 by Hertsmere Borough Council as part of a recent inquiry in the Borough where I gave evidence (see **Appendix JS3 and CD5.23**). I have submitted a similar SoCG as part of this appeal, which at the time of writing is awaiting agreement.
- 1.6 There is an acute need for more affordable homes to be delivered in the Hertsmere Borough which the appeal proposals would make a substantial contribution towards addressing.

Affordable Housing Evidence

Section 2

- i. My Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in the planning decision in light of the evidence of need in the Hertsmere Borough area.
- ii. Outline planning permission is sought for up to 195 dwellings, of which 45% are proposed as affordable homes equivalent to up to 88 affordable. This level of provision exceeds the requirements of Policy CS4 (40%) of the Core Strategy (2013).
- iii. The affordable housing provision will be secured through a Section 106 agreement. The tenure split of the proposed affordable housing units is to be agreed as part of the Reserved Matters application.

Key Findings

Corporate Documents

- iv. The Council's Homelessness and Rough Sleeping Strategy 2019-2023 identifies the delivery of affordable housing as a key priority for Hertsmere Borough Council.

Affordable Housing Needs

- v. Policy CS4 of the Core Strategy (2013) sets a policy target and states that "*The policy equates to an affordable housing target of 1,140 from 2012 to 2027*", equating to 76 per annum.
- vi. However, the 2016 SHMA identifies a need for 434 affordable dwellings per annum between 2013 and 2036, equivalent to 9,982 affordable dwellings over the 23-year period.
- vii. Furthermore, the most recent assessment of affordable housing is contained within the 2020 LHNA which identifies a higher need of 503 affordable dwellings per annum between 2020 and 2036, equivalent to 8,048 affordable dwellings over the 16-year period.
- viii. Whilst the Standard Method for calculating Local Housing Need applies an affordability adjustment, it does not provide a need figure for affordable housing in line with the PPG. 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).

Affordable Housing Delivery

- ix. Since the start of the 2016 SHMA period in 2013/14, affordable housing completions have averaged just 54 net affordable dwellings per annum, resulting in an accumulated shortfall of -3,418 affordable dwellings between 2013/14 and 2021/22, against an annual need of 434 affordable dwellings per annum. This is equivalent to an annual average shortfall of -380 affordable dwellings.
- x. Against the most recent assessment of affordable housing need (2020 LHNA), a significant shortfall has arisen in the first two years between 2020/21 and 2021/22, against a need for 503 affordable dwellings per annum. The shortfall equates to -874 affordable dwellings.
- xi. The Core Strategy (2013) sets a target of 76 affordable dwellings per annum during the plan period. Whilst this target is out of date, since 2012/13 there has also been a shortfall of -173 affordable dwellings.

Affordability Indicators

- xii. The following affordability indicators are material considerations and in this particular case demonstrate an ongoing deteriorating situation in Hertsmere Borough for those households seeking an affordable home:

Housing Register

- As at 31st March 2022 there were 799 households on the Housing Register. This represents a 39% increase in a single year from 576 households at 31 March 2021 (which itself was a 4% increase from 554 households at 31 March 2020).
- The waiting time for successful applicants to be allocated an affordable home within the Hertsmere area ranges from 21 months for a 1-bed affordable home through to an eye-watering 43 months for a 4-bed+ affordable home.

Housing Register Bids and Lettings

- Between 1 April 2021 to 31 March 2022 there were an average of 19 bids per 1-bed affordable dwelling put up for let in Radlett¹, 27 average bids per 2-bed

¹ Data not available at Ward/Parish level, instead Hertsmere Borough Council record this data at settlement level. In this instance Radlett is the relevant settlement.

affordable dwelling and 87 average bids per 3-bed affordable dwelling. No 4+ bed affordable dwellings were made available to let over the period in Radlett.

- This should be viewed in context of the fact that the FOI response also highlights that over the 2020/21 monitoring period there were only 24 social housing lettings in Radlett decreasing by 58% to just 10 lettings over the 2021/22 monitoring period.

Help to Buy Register

- The Help to Buy Register provides details of those seeking shared-ownership accommodation in the south of England. This demonstrates that as of 27 March 2023, 361 households are seeking a shared ownership home in Hertsmere Borough.

Temporary Accommodation

- The FOI response details that 46 households were housed in temporary accommodation within the Hertsmere Borough region at 31 March 2022.
- Furthermore, an additional 2 households were housed in temporary accommodation outside the Hertsmere Borough Council region at 31 March 2022.

Homelessness

- DLUHC statutory homelessness data shows that in the 12 months between 1 April 2021 and 31 March 2022, the Council accepted 230 households who triggered the homelessness prevention duty, and a further 205 households in need of relief duty from the Council.

Private Rental Market

- A median private rent of £1,250 pcm in 2021/22 is 45% higher than the East of England figure of £865 pcm and 57% higher than the national figure of £795 pcm.
- A lower quartile rent of £1,050 pcm in 2021/22 is 50% higher than the East of England figure of £700 pcm and 76% higher than the national figure of £595 pcm.

Median House Prices

- An affordability ratio of 14.39 in Hertsmere Borough stands significantly above the national average of 8.28 (+74%) and above the East of England average of 10.08 (+43%).

- In 2022 median house prices in the MSOA² (£1,046,250) were comparable with Aldenham East Ward (£1,050,000), the median house price is 198% higher than across Hertsmere Borough (£530,000), 329% higher than across the East of England (£318,275) and 388% higher than the national figure (£270,000).
- The appeal site sits across two LSOA³ areas, 'Hertsmere 005A' (£1,300,000) and 'Hertsmere 005B' (£1,575,000), both of which are significantly higher than the MSOA and ward figures which have already been established as being higher than the Borough, the East of England and the national average.

Lower Quartile House Prices

- A lower quartile affordability ratio in Hertsmere Borough (13.98) stands significantly above both the national average of 7.37 (+90%) and the East of England average of 9.90 (+41%).
- In 2022 lower quartile house prices in the MSOA (£657,500) were 107% higher than across Aldenham East Ward (£615,000), 164% higher than across Hertsmere Borough (£400,000), 280% higher than across the East of England (£235,000) and 365% higher than the national figure (£180,000).
- Lower quartile house prices in LSOA areas 'Hertsmere 005A' (£990,000) and 'Hertsmere 005B' (£1,220,000) are significantly higher than the figure for Aldenham East Ward which has already been established as higher than Hertsmere Borough, the East of England and the national average.

The Future Supply of Affordable Housing

- xiii. The Council's latest Five Year Housing Land Supply statement includes 1,713 dwellings coming forward in the next five years. If we were to generously assume that all of these sites would provide policy compliant levels of affordable housing (40%), this is likely to deliver only 685 affordable dwellings, equating to at best, 137 per annum between 2022/23 and 2026/27. The projected delivery of 137 affordable dwellings per annum falls significantly short of the 503 affordable dwellings per annum required by the 2020 LHNA. It is important to note that this figure then falls substantially short of the 678 per annum figure required when back log needs are addressed in the next five years in line with the Sedgefield approach.

² A geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. MSOAs have a minimum population of 5,000 households and a mean population of 7,200 households.

³ A geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. LSOAs have a minimum population of 1,000 households and a mean population of 1,500 households.

Conclusion

- xiv. In light of the key findings of my evidence and the acute need for affordable housing within Hertsmere Borough, I consider that **very substantial weight** should be attributed to the delivery of up to 88 affordable homes through the appeal scheme in the planning balance.