

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

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Land North of Bradmore Way, The Brookmans Park  
Estate, Brookmans Park, Hertfordshire (BrP12a)

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Outline application for 125 dwellings, of which 45% (up to 56 dwellings) will be provided as affordable housing.

Land North of Bradmore Way, The Brookmans Park Estate, Brookmans Park, Hertfordshire (BrP12a)

Aurora Properties (UK) Limited

January 2023

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# Introduction

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## Section 1

1.1 My name is **James Stacey** 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 27 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. I am the Managing Director of Tetlow King Planning.
- During my career, I have presented evidence in more than 100 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.
- 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 plans, including Local Development Framework Core Strategies and many specific development plan and supplementary planning documents on affordable housing throughout the UK

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

1.3 In researching my evidence, I have placed reliance upon Freedom of Information (“FOI”) requests submitted to Welwyn Hatfield Borough Council on 4 November 2022, seeking a range of information relating to affordable housing delivery. A full response from Welwyn Hatfield Borough Council was received on 6 December 2022.

- 1.4 There is an acute need for more affordable homes to be delivered in the Welwyn Hatfield Borough Council which the appeal proposals would make a substantial contribution towards addressing.

# Affordable Housing Evidence

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## Section 2

- 2.1 This **Affordable Housing Proof of Evidence** has been prepared by **James Stacey of Tetlow King Planning** on behalf of the Appellant, **Aurora Properties (UK) Limited**, in respect of their appeal for outline planning permission for residential development at Land North of Bradmore Way, The Brookmans Park Estate, Brookmans Park, Hertfordshire (BrP12a).
- 2.2 The proof of evidence deals specifically with affordable housing and the degree of weight which I believe should be applied in the planning decision, in the context of an acute unmet need for affordable housing across Welwyn Hatfield Borough. It should be read in conjunction with the Affordable Housing Statement which supported the planning application (**CD1.24**).
- 2.3 The proposed development comprises an enhanced offer of **45% affordable housing**, equivalent to **up to 56 affordable homes**, this is in excess of the policy requirement.

### **Key Findings**

#### **The Development Plan and Related Policies**

- 2.4 The adopted Welwyn Hatfield Local Plan requires 30% provision of affordable housing; and the emerging Local Plan 2013-2032 requires 35% provision, which the proposed development complies with by providing 45% affordable housing.
- 2.5 A range of documents including the Development Plan, emerging Local Plan and corporate documents, all show that the delivery of affordable housing is a clear corporate priority for Welwyn Hatfield Borough Council. Relevant documents include the Welwyn Hatfield Corporate Plan 2021-2024 and the Housing, Homelessness and Rough Sleeping Strategy 2019-2024.

#### **Affordable Housing Need in Welwyn Hatfield Borough**

- 2.6 The most recent assessment of affordable housing need in Welwyn Hatfield is contained in the Strategic Housing Market Assessment Update 2017 (the “2017 SHMA Update”). It finds there is a need for Welwyn Hatfield is **818** affordable homes per annum between 2015 and 2020, with **602** affordable homes needed annually thereafter until 2032.

## Affordable Housing Delivery in Welwyn Hatfield Borough

- 2.7 In the seven years since the start of the Local Plan period in 2015/16, a total of 406 affordable dwellings have been completed in Welwyn Hatfield Borough, equivalent to just 58 dwellings per annum and 15% of overall completions.
- 2.8 Since 2015/16, a total of 106 affordable dwellings have been lost through the Right to Buy from Registered Providers' stock. On a net basis, there have been just 300 affordable dwellings added to the stock in Welwyn Hatfield Borough since 2015/16, equivalent to just 43 dwellings per annum and 11% of overall completions.
- 2.9 When comparison is drawn between net affordable housing delivery and the needs identified in the 2017 SHMA Update for the seven-year period between 2015/16 and 2021/22, there has been an accumulated shortfall in the delivery of affordable housing of some -4,994 affordable homes against an identified need for 5,294 affordable homes over the same period.
- 2.10 Since the start of the 2017 SHMA Update period in 2015/16 there have been a total of 89 overall housing completions and zero affordable housing completions. The FOI response shows that between 2000/01 and 2021/22 there were zero affordable housing completions in the Parish.

## The Future Supply of Affordable Housing

- 2.11 Since the start of the 2015/16 monitoring period, the Council have overseen the delivery of 300 affordable homes (net of RtB sales) against a need of 5,294 net new affordable homes which has resulted in a shortfall of -4,994 affordable homes over the 7-year period.
- 2.12 When the shortfall is factored into the 2017 SHMA Update identified need of 665<sup>1</sup> affordable homes per annum for the period 2015 and 2032, the number of affordable homes the Council will need to complete substantially increase to 1,796 net affordable homes per annum for the period 2022/23 to 2026/27.
- 2.13 The Council's latest Annual Monitoring Report (February 2022) indicates a deliverable supply of 2,594 dwellings.
- 2.14 Based on the Council's assessment of supply it is likely that only 946 gross affordable dwellings will be delivered over the five year period, equating to just 186 gross affordable dwellings per annum (**Appendix JS7**). When additional affordable homes

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<sup>1</sup> (818 x 5 = 4,090) + (602 x 12 = 7,224) = 11,314 / 12 = 665.5

delivered through commuted payments are taken into account this figure rises to 951 affordable dwellings, equating to just under 190 affordable dwellings over the period.

- 2.15 This gross figure falls short of the 818 net affordable dwellings per annum required between 2015-2020 and the 602 per annum required thereafter until 2032 as identified by the 2017 SHMA Update.

### **Affordability Indicators**

- 2.16 The following affordability indicators are material considerations and illustrate the acute difficulties and worsening situation that faces households in Brookmans Park and Little Heath Ward and North Mymms Civil Parish (where the appeal site is located) and Welwyn Hatfield Borough. Important indicators include:

- a. At 31st March 2022 there were 3,119 households on the Housing Register. This represents an 8% increase in a single year from 2,876 households at 31 March 2021.
- b. The wait to be housed in an affordable home within the area ranges from 9 months for a 3-bed affordable home through to 22 months for a 4-bed+ affordable home.
- c. Between 1 April 2021 to 31 March 2022 there were an average of 128 bids per 1-bed affordable dwelling put up for let in the parish, 29 average bids per 2-bed affordable dwelling and 104 average bids per 3-bed affordable dwelling. No 4+ bed affordable dwellings were let over the period in North Mymms Civil Parish.
- d. As of 6 December 2022, 693 households are seeking a shared ownership home in Welwyn Hatfield Borough.
- e. A median private rent of £1,100 pcm in 2021/22 is 27% higher than the East of England figure of £865 pcm and 38% higher than the national figure of £795 pcm.
- f. A lower quartile rent of £895 pcm in 2021/22 is 28% higher than the East of England figure of £700 pcm and 50% higher than the national figure of £595 pcm.
- g. A median affordability ration of 12.37 in Welwyn Hatfield Borough stands significantly above the national average of 9.05 (+37%) and above the East of England average of 10.53 (+17%).
- h. In 2022 median house prices in Brookmans Park and Little Heath Ward (£835,000) were 101% higher than across Welwyn Hatfield Borough (£415,000), 162% higher than across the East of England (£318,275) and 209% higher than the national figure (£270,000).



- i. The lower quartile affordability ratio in Welwyn Hatfield Borough now stands significantly above the national average of 8.04 (+59%) and above the East of England average of 10.40 (+23%).
  - j. In 2022 lower quartile house prices in Brookmans Park and Little Heath Ward (£585,000) were 83% higher than across Welwyn Hatfield Borough (£320,000), 149% higher than across the East of England (£235,000) and 225% higher than the national figure (£180,000).
  - k. The lower quartile house price in Brookmans Park and Little Heath ward (where the site is located) was £600,000 in 2019/20<sup>2</sup> (29% increase from 2013/14<sup>3</sup>) and mean annual earnings for the Borough were £32,625<sup>4</sup> in 2019/20 which equates to an affordability ratio of 19.7.
- 2.17 Section 11 of the Statement draws together conclusions in respect of affordable housing need and delivery; the affordability indicators; the serious social consequences of not delivering affordable housing; and the findings of Inspectors at previous Section 78 planning appeals.
- 2.18 A failure to achieve a step-change in the delivery in Welwyn Hatfield Borough will simply exacerbate what is already an acute housing crisis in the area, which will leave more and more households to deal with the day-to-day hardship of poor quality, expensive and insecure housing.
- 2.19 Appeal decisions have shown that:
- a. Affordable housing is an important material consideration;
  - b. The importance of unmet need for affordable housing being met immediately;
  - c. Inspectors have recognised that the housing crisis is affecting real people and households, and that affordable homes can make a positive difference in their lives;
  - d. Planning Inspectors and the Secretary of State have attached at least substantial weight to the provision of affordable housing, and even very substantial weight in certain circumstances.
- 2.20 Taking the above into account, I consider that the proposed affordable housing should carry **very substantial weight** in the determination of this appeal.

<sup>2</sup> Office for National Statistics - HPSSA Dataset 37

<sup>3</sup> 2013/14 figure is for 'Brookmans Park' sub area' as defined by 2014 SHMA and 2019/20 figure is from Brookmans Park and Little Heath Ward

<sup>4</sup> Home Truths Report – East of England 2020