

Errata

PINS REF: APP/C1950/W/22/3307844

Date: 8 February 2023

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

Amendments to James Stacey Proof of Evidence

- 1) Due to a typographical error in respect of the future supply section (Section 8), I have prepared the following errata.
- 2) Paragraphs 8.11 – 8.24 should be amended to read (see below).

8.11 When the shortfall is factored into the 2017 SHMA Update identified need of 665²⁷ affordable homes per annum for the period 2015 and 2032, the number of affordable homes the Council will need to complete substantially increases to ~~4,378~~ **1,642** 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 to 2032 the annual affordable housing need reduces to 602 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 2015 base date of the 2017 SHMA Update

A	Affordable housing need per annum for the period 2015/16 to 2021/22 identified in the 2017 SHMA Update	756
B	Net Affordable housing need for the period 2015/16 to 2021/22 (A x 6)	4,536
C	Net of Right to Buy sales Affordable housing completions for the period 2015/16 to 2020/21	106
D	Shortfall/backlog of affordable housing need for the period 2015/16 to 2021/22 (B – C)	4,430
E	Backlog affordable housing need per annum required over the period 2021/22 to 2025/26 (D/5)	886
F	Full affordable housing need per annum for the period 2022/23 to 2026/27 (A + E)	1,642
G	Full affordable housing need for the period 2022/23 to 2026/27 (F x 5)	8,210

²⁷ (818 x 5 = 4,090) + (602 x 12 = 7,224) = 11,314 / 12 = 665.5

- 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 ~~8,968~~ 8,210 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 2026/27 incorporating Backlog Needs Accrued between 2015/16 and 2021/22 when applying the Sedgefield Approach

Monitoring Period	Net Affordable Housing Need – 2017 SHMA Update	Net Affordable Housing Need When Addressing Backlog Within Next Five Years
2022/23	602	1,642
2023/24	602	1,642
2024/25	602	1,642
2025/26	602	1,642
2026/27	602	1,642
Total	3,010	8,210

- 8.14 It is clear that the backlog in affordable housing needs within Welwyn Hatfield Borough will continue to grow unless the Council takes urgent and drastic action to address needs and deliver more affordable homes.

The Future Supply of Affordable Housing in Welwyn Hatfield Borough

- 8.15 The Council produced its latest Annual Monitoring Report (**CD.7.04**) in February 2022 which contains the Council’s housing trajectory covering the period 2021/22 to 2025/26, indicating a deliverable supply of 2,594 dwellings over the period.
- 8.16 For the purpose of this Statement, the calculations in respect of future affordable housing supply across the Borough have been calculated using the sites listed in Appendix 2 of the Council’s latest Annual Monitoring Report.
- 8.17 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 ~~486~~ 189 gross affordable dwellings per annum. A full breakdown of the sites is available at **Appendix JS7**.
- 8.18 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.

- 8.19 In addition to the on-site delivery, it is important to note that £821,594 in off-site affordable housing contributions have been collected across two qualifying sites in the Council's latest 5YHLS in lieu of providing affordable housing onsite (**Appendix JS7**).
- 8.20 The published Government consultation (August 2018) on the “*Use of receipts from Right to Buy sales*” attached at **Appendix JS8**, which indicated that the cost of building an affordable home in the South East²⁸ to be £167,000. Therefore, based on the total £821,594 collected, this would deliver just under 5²⁹ additional affordable homes if carried across the five years.
- 8.21 Therefore, if the additional affordable homes delivered through the commuted payments were also to be delivered within the five-year period, in addition to the 946 dwellings, this would total just under 951 affordable dwellings, equating to just under 190 affordable dwellings per annum over the period.
- 8.22 It should be noted that this figure fails to take account of losses to affordable housing stock through the Right to Buy. If the losses experienced by Welwyn Hatfield continue at the prevailing average rate over the past six years it is likely that the Council will lose around ~~420~~ **106** affordable dwellings from the supply (see Figure 3.2 **7.2**³⁰), equivalent to ~~24~~ **21** losses per annum.
- 8.23 When the effect of these losses is taken into account, the Council's supply figure for the next five years falls to just ~~466~~ **169** net affordable homes per annum.

Conclusions on Future Affordable Housing Supply

- 8.24 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 56 affordable dwellings on this site to address the district-wide needs of Welwyn Hatfield Borough Council should be afforded **very substantial weight** in the determination of this appeal.

Changes to Executive Summary

- 3) Paragraph xii of the executive summary should be amended to read:

When the shortfall is factored into the 2017 SHMA Update identified need of 665³¹ affordable homes per annum for the period 2015 and 2032, the number of affordable

²⁸ We have used the South East figure as the consultation does not provide a figure for the East of England

²⁹ £821,594 / £167,000 = 4.9 dwellings / 5 years = 0.98 dwellings per annum

³⁰ (313 LPA RtB losses + 5 RP RtB losses) – 212 (acquisitions) = loss of ~~420~~ **106** dwellings

³¹ (818 x 5 = 4,090) + (602 x 12 = 7,224) = 11,314 / 12 = 665.5

homes the Council will need to complete substantially increase to ~~1,796~~ 1,642 net affordable homes per annum for the period 2022/23 to 2026/27.

- 4) Paragraph xiv of the executive summary should be amended to read:

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 ~~486~~ 189 gross affordable dwellings per annum (**Appendix JS7**). When additional affordable homes 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.