

CD D9

# Summary Affordable Housing Proof of Evidence of Mr James Stacey BA (Hons) DipTP MRTPI

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Land south of Radwinter Road (East of Griffin Place),  
Saffron Walden



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Outline application for the erection of up to 233 residential dwellings including affordable housing, with public open space, landscaping, sustainable drainage system (SuDS) and associated works, with vehicular access point from Radwinter Road. All matters reserved except for means of access.

Land south of Radwinter Road (East of Griffin Place), Saffron Walden

Rosconn Strategic Land and the Executors of Mr EC Baker and Mrs J Baker

August 2022

PINS REF: APP/C1570/W/22/3296426

LPA REF: UTT/21/2509/OP

OUR REF: M22/0113-01.RPT

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# Introduction

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## Section 1

- 1.1 This **Summary Affordable Housing Proof of Evidence** has been prepared by **James Stacey of Tetlow King Planning** on behalf of the Appellants, **Rosconn Strategic Land and the Executors of Mr EC Baker and Mrs J Baker**.
- 1.2 Outline planning permission is sought for the development of up to 223 dwellings, of which 40% (up to 93 dwellings) are to be provided as on-site affordable housing. This level of provision accords with the requirements of policy H9 of the adopted Uttlesford Local Plan 2005.
- 1.3 The proposed tenure split is 70% affordable rented housing (up to 65 dwellings); 25% First Homes (up to 23 dwellings) and 5% shared ownership dwellings (up to 5 dwellings).
- 1.4 This Proof of Evidence deals specifically with affordable housing and the weight to be attributed to it in this planning decision<sup>1</sup> in light of evidence of need in the area. It should be read alongside the main Planning evidence of Mr Peter Frampton; the Highways evidence of Mr Chris Elliot; and a number of Written Statements in respect of other site-specific matters.
- 1.5 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. 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. Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.6 As part of my evidence, I have sought data from the Council through a Freedom of Information (“FOI”) request submitted to Uttlesford District Council on 29 June 2022 to which a response was received on 27 July 2022. This correspondence can be found at **Appendix JS1** of the main Proof of Evidence. I place reliance on this response.

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<sup>1</sup> For the avoidance of doubt, the weightings I apply are as follows: very limited; limited; moderate; significant; very significant; substantial; and very substantial.

# Summary Affordable Housing Evidence

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## Section 2

- i. 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 Uttlesford.
- ii. There is irrefutable evidence of an acute national housing crisis. On a national level, in every scenario, against every annual need figure identified since the publication of the Barker Review in 2004, the extent of the shortfall in housing delivery in England is staggering and ranges from a shortfall of -1,061,038 to a shortfall of -2,591,038 homes over the past 17 monitoring years depending on which annual target actual housing completions are measured against.
- iii. However, the true picture is that since 1969 the scale of the shortfall is over 5.5 million homes have not been provided. Not once in the last 50 years has the country built more than 300,000 homes.
- iv. In May 2021, Shelter published 'Denied the Right to a Safe Home – Exposing the Housing Emergency' which sets out in stark terms the impacts of the housing crisis. Shelter estimate that some 17 million people face the effects of high housing costs, lack of security of tenure and discrimination in the housing market, and notably concludes that *"when it comes down to it, there's only one way to end the housing emergency. Build more social housing"*.

### **Key Findings**

#### **Development Plan and Corporate Documents**

- v. The adopted Uttlesford Local Plan 2005 covers a timeframe to 2011 and is now time-expired. Its policy H9 'Affordable Housing' seeks 40% provision of affordable housing on qualifying sites.
- vi. The emerging Local Plan recognises the need for affordable housing although the Council's Local Development Scheme July 2022 indicates that adoption will not take place until 2025.

- vii. Corporate documents produced by the Council include the Housing Strategy, Homelessness and Rough Sleeping Strategy, and the Corporate Plan, which together recognise affordable housing as a high corporate priority and underline the importance of affordable housing and the consequences of poor affordability upon residents in Uttlesford.

### **Affordable Housing Needs**

- viii. The need for affordable housing is identified in the West Essex and East Hertfordshire Strategic Housing Market Assessment 2015, and the subsequent Affordable Housing Update 2017.
- ix. The SHMA 2015 identifies a need for 124 affordable dwellings per annum between 2011/12 and 2032/33.
- x. The SHMA Update 2017 identifies a need for 127 affordable dwellings per annum between 2011/12 and 2032/33.
- xi. In my opinion, these are minimum figures as they rely on use of the private rented sector to accommodate people in housing need. Section 6 of the Proof of Evidence discusses why this approach is inappropriate.

### **Affordable housing delivery**

- xii. On a gross basis, a total of 1,288 affordable homes have been completed in Uttlesford between 2011/12 and 2020/21, an average of 129 dwellings per annum. This is equivalent to 22% of overall housing completions.
- xiii. In Uttlesford between 2011/12 and 2020/21 a total of 97 dwellings have been lost through the Right to Buy, an average of 10 dwellings per annum.
- xiv. Once Right to Buy sales have been taken into account, a net total of 1,191 affordable homes have been completed in Uttlesford between 2011/12 and 2020/21, an average of 119 dwellings per annum. This is equivalent to 20% of overall housing completions (compared with a policy requirement of 40%)

### **Affordable Housing Delivery Against Identified Needs**

- xv. When comparing net affordable housing delivery with the needs identified in the 2017 SHMA of 124 affordable dwellings per annum between 2011/12 and 2031/32, the Council has delivered a shortfall of -49 affordable dwellings (equivalent to -5 dwellings per annum).

- xvi. When comparing net affordable housing delivery with the needs identified in the 2017 SHMA of 127 affordable dwellings per annum between 2016/17 and 2031/32, the Council has delivered a surplus of +75 affordable dwellings (equivalent to +15 dwellings per annum). Although this is judged against a minimum figure.

### **The Future Supply of Affordable Housing**

- xvii. Tetlow King Planning has analysed the forward supply of affordable housing over the five year period 2021/22 to 2025/26. The assessment shows that around 598 affordable dwellings will come forward over the five year period. This equates to around 120 affordable dwellings per annum over the period.
- xviii. Applying the prevailing average of 10 Right to Buy losses per annum to the five year forward supply would result in net delivery of just 110 affordable dwellings per annum 2020/21 to 2024/25.
- xix. This is insufficient to meet the need of 127 affordable dwellings per annum as identified in the SHMA 2017.

### **Affordability Indicators**

- xx. The following affordability indicators are material considerations and in this case demonstrate a worsening situation in Uttlesford for any household seeking an affordable home.

#### Housing Register

- xxi. As of 31 March 2022, the Council had 1,268 households on the housing register. These are households who have met the Council's strict eligibility criteria and are in housing need.
- xxii. As of 31 March 2022, 461 households on the register have expressed a location preference for Saffron Walden Civil Parish equivalent to 36% of the Register, or more than one-in-three applicants.
- xxiii. 94 applicants also expressed a locational preference for Swards End Civil Parish, equivalent to 7% of the Register. It should be noted that the figure of 94 is very similar to the proposed amount of affordable housing from the application (up to 93 dwellings).

#### Waiting times

- xxiv. The wait to be housed in an affordable home within the Uttlesford area ranges from 7 months for a 2-bed affordable home through to 13 months for a 3-bed affordable home. Waiting times have worsened between 2021 and 2022.

#### Help to Buy Register

- xxv. The Help to Buy Register provides details of those seeking shared-ownership accommodation in the District. This demonstrates that as of 22 July 2022, there are 407 households who are seeking a shared ownership home in Uttlesford.

#### Affordability Ratios

- xxvi. In Uttlesford in 2021, the median house cost 13.40 times median earnings; well in excess of both the East of England ratio of 10.53 and the national ratio of 9.05.
- xxvii. 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 Uttlesford stands at 14.54 in 2021, exceeding both the East of England ratio of 10.40 and the national ratio of 8.04.

#### Average House Prices

- xxviii. In 2021, the median house price in Uttlesford was £445,000, which is £171,000 (+62%) more than the national average of £274,000; it is also £127,000 (+40%) more than the East of England regional average of £318,000.
- xxix. In 2021, the lower quartile house price in Uttlesford was £337,750, which is £160,250 (+90%) more than the national lower quartile of £177,500 (i.e. almost double); it is also £105,250 (+45%) more than the East of England regional lower quartile of £232,500.

#### Lower Quartile Private Sector Rents

- xxx. In Uttlesford in 2021/22, the lower quartile private sector rent stood at £895 per calendar month; this is £195 (or +28%) more than the East of England lower quartile figure of £700, and £300 (or +50%) more than the England lower quartile figure of £595pcm.

#### Homelessness

- xxxi. In respect of homelessness in Uttlesford during 2020/21, there were 148 households assessed and owed a main duty.

#### Tenure

- xxxii. The tenure mix in Uttlesford leans towards home ownership, which accounts for 72% of all households (compared with 63% across England and 68% in the East of England).

xxxiii. There is a correspondingly smaller social rented sector in Uttlesford, which accounts for 13% of all households (compared with 18% across England and 16% in the East of England). Shared ownership accounts for just 1% of households in Uttlesford.

#### Council Tax

xxxiv. In Uttlesford at 31 March 2021, the housing stock skews heavily towards the more expensive bands E, F, G and H, which account for some 44% of properties (compared with 19% nationally and 21% in the East of England region).

xxxv. By contrast, the cheapest bands A and B account for just 13% of properties in Uttlesford (compared with 44% nationally and 35% in the East of England region).

#### **Conclusions and Weight**

xxxvi. Market signals indicate a worsening trend in affordability across Uttlesford and by any measure of affordability, this is an authority in the midst of an affordable housing emergency, and one through which urgent action must be taken to deliver more affordable homes. I have no doubt that every one of the affordable homes will be allocated to a household in need.

xxxvii. In this context, the proposed 40% affordable housing, totalling up to 93 homes, will make a significant and tangible positive impact on the lives of those real households in need who will occupy each affordable home. The scheme will enable up to 93 more households to access good, affordable accommodation

xxxviii. In light of all the evidence, I consider that the proposed affordable housing is an important social benefit of the appeal scheme and should be attributed **substantial weight** in the determination of this appeal.