

Affordable Housing Proof of Evidence of Mr Jamie Roberts MPlan MRTPI

Land North of A507 and West of A10, Buntingford

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Outline planning application for development of up to 600 dwellings (C3), up to 60 units of elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridges over the A10, with all matters reserved save for access

Land North of A507 and West of A10, Buntingford

Appeal by Hallam Land Management

August 2026

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Contents

	Executive Summary	
Section 1	Introduction	1
Section 2	Affordable Housing as an Important Material Consideration	4
Section 3	The Consequences of Failing to Meet Affordable Housing Needs	5
Section 4	The Development Plan and Related Policies	7
Section 5	Affordable Housing Needs	14
Section 6	Affordable Housing Delivery and Future Supply	17
Section 7	Affordability Indicators	24
Section 8	The Local Context for Affordable Housing in Buntingford	31
Section 9	The Weight to be Attached to the Proposed Affordable Housing	35

Appendices

Appendix JR1	Freedom of Information Response dated 14 January 2026
Appendix JR2	Extracts from National Planning Policy Framework (December 2024)
Appendix JR3	Extracts from Planning Practice Guidance
Appendix JR4	Relevant Written Ministerial Statements
Appendix JR5	The National Housing Crisis
Appendix JR6	Calculation of Net Affordable Housing Additions
Appendix JR7	Review of the Future Supply of Affordable Housing – Published Trajectory
Appendix JR8	Review of the Future Supply of Affordable Housing – Appellant's Position

Core Document References

4	Consultee Responses
CD 4.13	Housing Strategy Officer 21.06.2024
5	Development Plan / Policy / Guidance / Studies
CD 5.1	East Herts District Plan (adopted 2018)
CD 5.2	Buntingford Community Area Neighbourhood Plan (made 2016)
CD 5.4	East Herts Affordable Housing Supplementary Planning Document (2020)
CD 5.9	Emerging Local Plan: Strategic Vision document
CD 5.16	National Planning Policy Framework December 2024
CD 5.20	New Local Plan Timetable
CD 5.29	East Herts 'LEAF' Corporate Plan 2024 to 2027
CD 5.30	East Herts Housing Strategy 2022 to 2027
CD 5.31	Emerging Local Plan: Scoping Consultation
7	Appeal Decisions and Planning Decisions
CD 7.1	Appeal Decision 3340497 - Land East of the A10 at Buntingford
CD 7.19	Appeal Decision 3350230 - Heybridge, Maldon
CD 7.20	Appeal Decision 3136237 - Langton Road, Norton
CD 7.21	Appeal Decision 3332590 - Coombebury Cottage Dunsfold
CD 7.22	Appeal Decision 3282908 - Hawkhurst, Kent
11	Five Year Housing Land Supply documents
CD 11.3	East Herts Housing Trajectory 31 March 2025
12	Affordable Housing documents
CD 12.1	Strategic Housing Market Assessment 2015
CD 12.2	Strategic Housing Market Assessment – Affordable Housing Update 2017
CD 12.3	Affordable Housing Needs Assessment 2022
CD 12.4	<i>“Social and Affordable Housing Renewal”</i> Written Ministerial Statement (2 July 2025)
CD 12.5	<i>“Building the Homes We Need”</i> Written Ministerial Statement (30 July 2024)
CD 12.6	<i>“Building the Homes We Need”</i> Written Ministerial Statement (12 December 2024)
CD 12.7	<i>“Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing”</i> Written Ministerial Statement (12 February 2025)
CD 12.8	House of Commons Debate (24 October 2013)
CD 12.9	<i>“Bleak Houses: Tackling the Crisis of Family Homelessness in England”</i> (August 2019)
CD 12.10	<i>“Denied the Right to a Safe Home – Exposing the Housing Emergency”</i> (May 2021)
15	Statements of Common Ground
CD 15.2	Five Year Housing Land Supply Statement of Common Ground

Executive Summary

1. This Affordable Housing Proof of Evidence is produced by **Mr Jamie Roberts MPlan MRTPI of Tetlow King Planning** on behalf of the Appellant, **Hallam Land Management**. This Proof of Evidence deals specifically with affordable housing and the weight to be attached to it in this planning decision considering evidence of affordable need in East Herts and in Buntingford.
2. The proposed development includes up to 660 dwellings, of which 40% will be affordable, equivalent to the on-site provision of up to 264 affordable dwellings. This meets the requirements of the adopted District Plan Policy HOU3 and is a specific benefit to be weighed in the planning balance.

The Development Plan and Related Policies

3. The adopted District Plan (**CD 5.1**) covers the 22-year period from 2011/12 to 2032/33. Housing is identified as one of the key issues that the Plan seeks to address, and the vision and objectives both highlight the importance of affordable homes.
4. Policy HOU3 'Affordable Housing' is the primary policy for securing affordable housing and seeks 40% affordable housing provision on sites proposing 15 or more gross additional dwellings. The proposed development accords with this policy requirement.
5. The Council is in the early stages of preparing a new Local Plan; in June 2025 it issued a Notice of Intention to prepare the new Local Plan, alongside a Scoping Consultation (**CD 5.31**). It is clear from the consultation papers that the Council considers housing affordability and its consequences to be very important issues for the new Plan to address.
6. In addition, the Affordable Housing Supplementary Planning Document (**CD 5.4**) and corporate documents including the 'LEAF' Corporate Plan (**CD 5.29**) and the Housing Strategy (**CD 5.30**) highlight the importance of affordable housing delivery in East Herts.

Affordable Housing Needs

7. There are two relevant assessments of affordable housing need in East Herts:
 - a. The Strategic Housing Market Assessment Affordable Housing Update of 2017 (**CD 12.2**): this informed the production of the adopted District Plan and

identifies a need for 217 affordable dwellings per annum from 2016/17 to 2032/33.

- b. The Affordable Housing Needs Assessment 2022 (**CD 12.3**) is the most recent assessment of housing need in East Herts and identifies a need for 315 affordable dwellings per annum from 2021/22 to 2032/33.

- 8. Both assessments are stringent in their approach to affordability; both the SHMA and AHNA need figures must be treated with some caution and only as minimum needs.

Affordable Housing Delivery and Future Supply

- 9. Over the District Plan period since 2011/12, a total of 2,855 affordable dwellings (net of Right to Buy sales) have been completed in East Herts, equivalent to 204 net affordable dwellings per annum, or 28% of net overall completions:
 - a. When assessed against the older SHMA Affordable Housing Update 2017 (217 dwellings per annum), a surplus of +282 dwellings has been provided; but
 - b. Against the most recent assessment in the AHNA 2022 (315 dwellings per annum), a shortfall of -139 affordable dwellings has already arisen in the first four years.
- 10. In order to understand whether the Council can meet its housing needs into the future, I have undertaken a detailed review of the Council's housing trajectory (**Appendix JRx**) and the Appellant's position as set out in the evidence of Mr Pycroft and in the Statement of Common Ground (**Appendix JRx**). Based upon this review, the Council is likely to be able to deliver an average of 236 affordable dwellings per annum based upon its published trajectory, falling to just 164 affordable dwellings per annum after accounting for the agreed deductions in the Statement of Common Ground and the Appellant's position on disputed sites.
- 11. On this basis, the existing shortfall of -139 affordable dwellings will widen to -894 dwellings by the end of 2029/30 – each of these a missed opportunity to provide a decent affordable home for a household in need.

Affordability Indicators

- 12. Affordability indicators are an important part of understanding the 'real world' context for households seeking a home in East Herts now. An array of indicators illustrates the scale of the housing crisis in East Herts:

- a. 2,315 households on the Housing Register on 31 March 2025, of whom 1,805 have a statutory 'reasonable preference';
- b. 176 households being placed in temporary accommodation on 31 March 2025, at a cost of almost £1.1 million to East Herts Council that year;
- c. The lower quartile home costs 10.85 times lower quartile earnings; this ratio has risen for two successive years, bucking the trend of improvement at both the regional and national level;
- d. High lower quartile house prices in East Herts, well in excess of the regional and national lower quartile figures;
- e. Rapidly rising private sector rents, which are above the regional and national average and now stand at £1,426 per calendar month in East Herts; and
- f. An existing tenure mix which is skewed towards home ownership and away from rented tenures, especially affordable tenures.

The Local Context for Affordable Housing in Buntingford

13. The local context for affordable housing in Buntingford is even more challenging:
 - a. High lower quartile house prices relative to East Herts as a whole;
 - b. 516 households on the Housing Register have expressed a locational preference for Buntingford, of whom 123 have a high housing need, and 267 have dependent children;
 - c. Just 46 affordable housing lettings in Buntingford in 2024/25;
 - d. Average bids per affordable dwelling advertised ranging from 43 bids to 111 bids depending on the size of the property; and
 - e. A 'pipeline' of 265 affordable dwellings with planning permission in Buntingford, which is not enough to address the identified needs on the Housing Register.

The Weight to be Attached to the Proposed Affordable Housing

14. It is my view that East Herts is facing a housing crisis, which calls for strong action to alleviate the very real effects that poor quality, overcrowded, insecure and expensive housing has upon real people in this District.
15. Drawing the above factors together, it is my assessment that the proposed affordable housing carries **substantial weight** in the determination of this appeal.

Introduction

Section 1

- 1.1 This **Affordable Housing Proof of Evidence** is produced by **Mr Jamie Roberts MPlan MRTPI** of **Tetlow King Planning** on behalf of the Appellant, **Hallam Land Management**. It is submitted in support of their appeal 6008238 against the decision of East Herts Council to refuse planning application 3/24/0966/OUT for residential and mixed use development at Land North of A507 and West of A10, Buntingford.

The Proposed Affordable Housing

- 1.2 The description of the proposed development is:

“Outline planning application for development of up to 600 dwellings (C3), up to 60 units of elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridges over the A10, with all matters reserved save for access.”

- 1.3 The proposed development includes up to 660 dwellings (600 dwellings plus 60 units of elderly accommodation in Use Class C3), of which **40% will be affordable**, equivalent to the **on-site provision of up to 264 affordable dwellings**. This meets the requirements of the adopted District Plan (**CD 5.1**) Policy HOU3.
- 1.4 The delivery of affordable housing is required by the Development Plan. It is not needed to prevent or mitigate a specific planning harm; instead, it is a specific benefit of development to be weighed in the planning balance.
- 1.5 The tenure split is to be agreed with East Herts Council and it is expected that this will be broadly in line with the Affordable Housing Supplementary Planning Document 2020 (**CD 5.4**).
- 1.6 The proposed affordable housing will be secured by way of a planning obligation.

About this Affordable Housing Proof of Evidence

- 1.7 This Proof of Evidence deals specifically with affordable housing and the weight¹ to be attached to it in this planning decision considering evidence of affordable need in this area.
- 1.8 This Proof of Evidence should be read alongside the main planning Proof of Evidence of Mr Gary Stephens, and the housing land supply Proof of Evidence of Mr Ben Pycroft.
- 1.9 My credentials as an expert witness are summarised as follows:
- a. I hold a Master of Planning (MPlan) degree in Urban Studies and Planning from the University of Sheffield (2013). I am a chartered member of the Royal Town Planning Institute.
 - b. I have over 12 years' professional experience in the field of town planning. I was first employed in 2013 at a national planning consultancy in the East of England. I joined Tetlow King Planning in 2019 and became an Associate Director in December 2024.
 - c. I have previously given evidence to over 30 inquiries and hearings as well as Local Plan examinations in recent years, throughout England, at which my evidence and methodology have been accepted and endorsed by Inspectors.
 - d. I have acted for a range of clients including housebuilders, strategic land promoters, and housing associations. My work is primarily in the residential sector, with interests in matters of housing need and affordable housing.
- 1.10 In accordance with the Planning Inspectorate's Procedural Guidance, I declare that:
- "The evidence which I have prepared and provide for this appeal reference 6008238 in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions."*
- 1.11 I confirm that I have not used Artificial Intelligence technology in preparing this evidence.
- 1.12 I have sought data from the Council, upon which I place reliance, through a Freedom of Information Request to East Herts Council made on 22 December 2025. The response was received on 14 January 2026 and I am grateful for the Council's efforts in providing this. The relevant correspondence can be found at **Appendix JR1**.

¹ For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

1.13 This Proof of Evidence comprises the following eight sections:

- a. Section 2 establishes the importance of affordable housing as an important material consideration;
- b. Section 3 considers the consequences of failing to meet affordable housing needs;
- c. Section 4 summarises the Development Plan and related policies in East Herts;
- d. Section 5 sets out the identified affordable housing needs of East Herts;
- e. Section 6 examines the past delivery and future supply of affordable housing in the District;
- f. Section 7 covers a range of affordability indicators;
- g. Section 8 focuses on affordable housing matters in Buntingford;
- h. Section 9 draws conclusions on the weight to be attached to the proposed 264 affordable homes.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF").

National Planning Policy Framework (12 December 2024) (CD 5.16)

- 2.2 The NPPF is a material planning consideration and identifies the role of affordable housing in the plan-making and decision-taking processes. I set out a summary of the key matters relating to affordable housing in **Appendix JR2**.

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.3 The Planning Practice Guidance ("PPG") was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document's application. **Appendix JR3** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Written Ministerial Statements

- 2.4 In 2024 and 2025, the government issued several Written Ministerial Statements ("WMS"; see **CD 12.4** to **CD 12.7**) setting out its commitment to delivering affordable housing in the context of a housing crisis. I summarise each of these in **Appendix JR4**.

Summary and Conclusions

- 2.5 This section clearly demonstrates that, within national policy and guidance, providing affordable housing has long been established as, and remains, a key national priority of successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

The Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

- 3.1 The National Housing Strategy² sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 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. A lack of financial security and stability;
 - b. Harmful impacts on physical and mental health;
 - c. Decreased social mobility;
 - d. Negative impacts on children's education and development;
 - e. Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour, or those with substance abuse issues;
 - f. Being housed outside social support networks;
 - g. Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food; and
 - h. An increasing national housing benefit bill.
- 3.3 These harsh consequences on households, individuals and children 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.

² Laying the Foundations: A Housing Strategy for England (November 2011)

- 3.4 I set out in **Appendix JR5** a series of reports, articles and debates that highlight the consequences of failing to delivery sufficient levels of affordable housing. While these relate to the national picture, the responsibility falls on each of the 337 local planning authorities in England, alongside individual decisions taken by Councils and Inspectors on applications and appeals, to alleviate the effects of this national crisis.
- 3.5 I am strongly of the opinion that a step change in delivery of affordable housing locally and nationally is needed now.

Summary and Conclusions

- 3.6 The delivery of affordable housing both locally and nationally is urgently required. The level of affordable housing need in East Herts, coupled with worsening pressure on the affordability of housing, discussed in detail in the subsequent sections of my evidence, will continue to limit local households' ability to live stable, fulfilling lives. National policy recognises this challenge and calls for decisive action to increase housing supply, highlighting the significant social consequences of failure to meeting housing needs.

The Development Plan and Related Policies

Section 4

- 4.1 The Development Plan in East Herts is the East Herts District Plan (the “District Plan”) which was adopted in 2018. In addition, the Buntingford Community Area Neighbourhood Plan forms part of the Development Plan in the Buntingford local area.
- 4.2 Other material considerations relevant to this application include several corporate documents produced by East Herts Council, which identify the provision of affordable housing as an important corporate priority.

The Development Plan

East Herts District Plan (adopted 2018) (CD 5.1)

- 4.3 The adopted District Plan contains strategic and detailed policies for meeting the development needs of East Herts over the 22-year period from 2011/12 to 2032/33.
- 4.4 Chapter 2 provides the overall Vision and Strategic Objectives that the District Plan seeks to address. Section 2.3 sets out the key issues and challenges for the Plan, with paragraph 2.3.4 at page 16 introducing housing – and specifically affordable housing – as one of these key issues:

*“**Housing** – East Herts is an attractive place to live, which is reflected in high house prices. There is a pressing need for more affordable housing in the District. Achieving housing development that responds to local needs, whilst recognising the environmental and other constraints in East Herts, is a significant challenge. It is also necessary to recognise the specific accommodation and housing needs of different groups in the local community”*

- 4.5 The Vision for East Herts in 2033 is presented at Section 2.4 at page 17 and point three addresses housing and affordable housing delivery:

“A range of sizes, types and tenure of new housing and accommodation will have been provided; including the provision of accessible and adaptable dwellings to meet the changing needs of occupants over their lifetime. There will be an increase in the overall stock of affordable housing including starter homes.”

- 4.6 Correspondingly, Strategic Objective 3 at page 19 seeks to *“balance the housing market by delivering a mix of market, low cost, and affordable homes and accommodating the housing needs of an ageing population”*.
- 4.7 Chapter 6 presents the development strategy for Buntingford and paragraph 6.1.9 at page 79 makes clear the role of affordable housing in supporting households to remain in the local area, stating that *“The provision of affordable housing [...] will allow emerging households to be able to remain living in Buntingford in accommodation suited to their needs”*. Policy BUNT1 at page 81 sets out that the town will accommodate a minimum of 1,074 dwellings at six allocated sites (plus windfall).
- 4.8 Chapter 14 includes the policies for housing; paragraph 14.4.1 at page 181 mentions that *“the affordability of housing is a key issue across the District”* and paragraph 14.4.3 highlighting the evidence of the *“significant need for additional affordable housing”*, contained in the Strategic Housing Market Assessment 2015 (discussed at Section 5 of this Proof of Evidence). Table 14.1 beneath summarises the calculation of housing need, with an average of 217 affordable dwellings per annum being required over the 15 years from 2016/17 to 2032/33, or 32% of overall housing need for all tenures.
- 4.9 Paragraphs 14.4.4 through to 14.4.6 at page 182 explain how the District Plan aims to address this need, with either 35% or 40% affordable housing being sought from developments, depending upon the size of the site. As paragraph 14.4.5 explains, some sites do not qualify for affordable housing, which is why the requirement is higher than the 32% of overall housing need. It is clear that the District Plan aims to meet the identified affordable housing needs.
- 4.10 **Policy HOU3 ‘Affordable Housing’** is at page 186 and is the primary policy for securing affordable housing in East Herts. Point I of the policy seeks 35% provision on smaller sites (11 to 14 dwellings, or where the gross floorspace exceeds 1,000 square metres) and 40% on sites proposing 15 or more gross additional dwellings. The 40% requirement therefore applies to the proposed development. Point II sets out that the mix of affordable housing tenures is not specified but will take account of *“the Council’s most up to date evidence on housing need”*.
- 4.11 Points III, IV, V and VI refer to detailed matters of viability, off-site provision in exceptional circumstances, layout and design, and the use of planning obligations, respectively.

- 4.12 Policy HOU4 'Rural Exception Affordable Housing Sites' provides a policy route for rural exception sites to come forward to meet specific local needs. For the avoidance of doubt, this policy does not apply to the proposed development.
- 4.13 The monitoring framework for the District Plan is contained at Chapter 25 and Policy DEL3 'Monitoring Framework', which sets a specific affordable housing target of 75% of the annual target for the preceding three-year monitoring period. Where the target is not met, the Council will consider actions including increasing density on allocated sites, bringing forward strategic sites earlier in the Plan period, and addressing unmet needs under the Duty to Cooperate.

Buntingford Community Area Neighbourhood Plan (made 2016) (CD 5.2)

- 4.14 The Buntingford Community Area Neighbourhood Plan contains detailed policies which apply in Buntingford and its surrounding villages over a 17-year plan period from 2014/15 to 2030/31. There is little policy coverage of affordable housing in the Neighbourhood Plan (with this being covered in the District Plan) although it is noted at page 40 that *"there was support [expressed through consultation responses] for affordable housing provision, particularly for those who already live in the BCA [Buntingford Community Area], or have connections to it, and a recognition that housing demand means that development has to be accommodated"*.

Other Material Considerations

New Local Plan

- 4.15 East Herts Council is in the early stages of preparing a new Local Plan. The Council published its formal Notice of Intention to prepare a new Local Plan on 11 June 2026. On the same day, the Council launched a Scoping Consultation on the content the new Local Plan will contain alongside the Vision for the Local Plan.

Scoping Consultation June to July 2026 (CD 5.31)

- 4.16 Section 3 of the Scoping Consultation sets out the Challenges and Opportunities that the Local Plan seeks to address. Under the heading 'Housing' the role of affordable housing is acknowledged: *"The Plan will also need to address the diverse housing needs of the district's population. This includes providing a suitable mix of housing types, sizes, and tenures, including affordable housing, in locations where need is anticipated"*.

- 4.17 Section 4 sets out the Plan Vision including a Vision Statement and a separate Draft Vision Document. The short Vision Statement includes affordable housing as a central part of the vision that the Local Plan will seek to achieve:

“Renowned for our unique and charming historic market towns and villages set within beautiful countryside, rare chalk streams and rich heritage, East Herts will be an exemplar of sustainability, where innovative design solutions respect local character and are harnessed to mitigate and adapt to climate change and enhance biodiversity.

Our communities will continue to thrive, supported by affordable and accessible housing, reliable public transport, and improved public open spaces—promoting active lifestyles and creating inclusive places for all.

By nurturing local businesses, we will create a resilient, prosperous and secure future for all residents and visitors.

Collectively, we will recognise the responsibility we have to create a district fit for future generations.” (my emphasis)

Vision Statement (CD 5.9)

- 4.18 The Council has produced a Vision Document, which was subject to public consultation in March 2025 and also forms part of the recent Scoping Consultation. Under the heading of ‘People’ at page 7, the housing challenge and its consequences are discussed:

“While East Herts is generally prosperous, there are pockets of deprivation across the district. The demand for new housing, combined with high house prices, exacerbates this issue, highlighting underlying social challenges in some areas. The increasing demand for housing, coupled with rising house prices and cost of living, has made it difficult for many young people and families to find affordable homes, leading to longer stays with parents, or moving out of the area and separating families.” (my emphasis)

- 4.19 It is also noted on page 7 that 14.9% of households in East Herts are classed as being ‘financially stretched’.

- 4.20 Overleaf at page 9 under the heading of ‘Place’ it is further noted that:

“East Herts faces significant pressures on housing affordability and delivery. The high cost of homes and the limited availability of social housing create

barriers for many residents, particularly younger generations and those with fewer means.”

4.21 The consultation paper culminates with a Vision Statement at page 20, which states that *“Our communities will continue to thrive, supported by affordable and accessible housing”*. Further to this, the specific aspiration to *“Increase access to affordable housing”* is set out at page 23.

4.22 While the new Local Plan is at a very early stage of its preparation, the emerging Vision already makes clear that the Council considers housing affordability and its consequences to be very important issues for the new Plan to address.

Local Plan Timetable (CD 5.20)

4.23 The most recent Local Plan Timetable is dated 13 July 2026 and shows that the Council intends to consult on the Plan in February 2027 (content and evidence) and February 2028 (proposed Local Plan); submit the plan for Examination in October 2028, and following Examination adopt the Local Plan in April 2029. At the time of preparing this Proof of Evidence in August 2026, this timetable means that any new Local Plan is at least 2 years and 8 months away from adoption (assuming that the timetable is adhered to, including at the Examination stage).

Affordable Housing Supplementary Planning Document (adopted 2020) (CD 5.4)

4.24 The Affordable Housing Supplementary Planning Document provides detailed guidance on the implementation of District Plan Policies HOU3 and HOU4.

4.25 The introduction confirms that East Herts Council places great importance on being able to access decent and affordable housing, alongside the role of the District Plan in facilitating this. Paragraph 1.0.1 at page 2 makes clear:

“The Council believes that everyone should be given the opportunity to access a decent home, which they can afford and is in a community where they want to live. A key objective of the East Herts District Plan seeks to ensure that new housing is accessible to and meets the needs and aspirations of the District’s communities.”

4.26 Paragraph 1.2.1 at page 4 highlights the important role of the planning system in bringing forward affordable homes, describing it as *“central”* to affordable housing delivery, accounting for *“the majority of affordable housing in East Herts”*.

- 4.27 Section 2 recaps the affordable housing requirements set out in District Plan policy HOU3, and Section 3 sets out how the Council will assess affordable housing matters at the planning application stage.
- 4.28 Section 3.2 at page 8 sets out the Council's approach to housing mix, type and tenure, with reference to the Strategic Housing Market Assessment (discussed in more depth in Section 5 of this Proof of Evidence). Paragraph 3.2.3 sets out that a split of 84% affordable rent and 16% intermediate tenures would be justified by the evidence in the SHMA but paragraphs 3.2.4 and 3.2.5 refer to the prevailing NPPF requirement to deliver 10% of the total housing on a given site as affordable home ownership, so the Council will accept up to 25% of the affordable housing as intermediate tenures.
- 4.29 Subsequent parts of Section 3 discuss design and layout (to be considered at the reserved matters stage); off-site provision of affordable housing, vacant building credit and financial contributions, none of which apply to the appeal scheme which offers 35% on-site affordable housing. Section 4 sets out the matters to be covered through the Section 106 agreement; while Section 5 discusses the approach to be taken to viability (which does not apply to the appeal scheme as no viability case is being made).

Corporate Documents

- 4.30 The Council's corporate documents identify the delivery of affordable housing as a key corporate priority of East Herts Council.

'LEAF' Corporate Plan 2024 to 2027 (CD 5.29)

- 4.31 The Council's corporate plan is set out in the format of a single-page poster, setting out the actions that the Council intends to take. Under the heading 'Acting with the Community'; the Plan sets out that the Council will *"Prioritise actions that can provide Housing which is truly affordable"*. Under the theme 'Fair and Inclusive', the Council will *"Support those facing homelessness or recovering from it and include them in consultations and community activities"*.

Housing Strategy 2022 to 2027 (CD 5.30)

- 4.32 The East Herts Housing Strategy 2022 to 2027 sets out four strategic priorities: *"deliver more affordable housing, enable a wider range of accommodation and support for the most vulnerable residents, provide high quality housing options for older people which are better suited to their needs, and improve the sustainability and quality of homes"*.

- 4.33 The Foreword to the Strategy on page 3 notes that average house prices in the District are some 47% higher than the national average, stating *“that fact alone suggests the need for affordable housing is high”*. As set out in Figure 7.3 of this Proof of Evidence, the lower quartile house price in East Herts is now 71% higher than that in England, illustrating the worsening affordability in the four years since 2022 when the Housing Strategy took effect.
- 4.34 Page 4 of the Strategy adds that *“an insufficient supply of affordable homes continues to pose challenges”*.
- 4.35 The Strategy’s Strategic Priority 2 is introduced at page 21, with it stating that *“with growing affordability issues and consequently fewer housing options as discussed earlier in this strategy, preventing homelessness is an increasingly difficult challenge and one that needs to be tackled in several different ways”*.

Summary and Conclusions

- 4.36 The relevant Development Plan in respect of affordable housing for East Herts currently comprises the District Plan (adopted 2018).
- 4.37 The evidence set out in this section clearly highlights that within adopted policy, emerging policy and a range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within East Herts.
- 4.38 The appeal scheme offers 40% on-site affordable housing which meets the requirements of the East Herts District Plan Policy HOU3. In my opinion, the delivery of up to 264 affordable homes here will contribute significantly towards meeting the annual affordable housing needs of the District, particularly when viewed in the context of past rates of affordable housing delivery which are considered in more detail in Section 6 of this Proof of Evidence.

Affordable Housing Needs

Section 5

5.1 Development Plans and their policies are underpinned by evidence of affordable housing need. In East Herts, the District Plan is evidenced by the Strategic Housing Market Assessment 2015 and the Affordable Housing Update in 2017. More recently, the Council has commissioned an Affordable Housing Needs Assessment in 2022 to inform future Local Plan production.

5.2 This section of the Proof of Evidence summarises these assessments of affordable housing need.

Strategic Housing Market Assessment 2015 (CD 12.1) and Affordable Housing Update 2017 (CD 12.2)

5.3 The Strategic Housing Market Assessment 2015, updated in 2017, was prepared by Opinion Research Services and forms part of the evidence base for the adopted District Plan. The Affordable Housing Update 2017 is referenced in Section 14 of the District Plan and seeks to identify the affordable housing need for the 17-year period 2016/17 to 2032/33.

5.4 The calculation is summarised at Figure 21 at page 33, which states an overall need of 3,685 affordable dwellings over the 17-year period, or an average of **217 affordable dwellings per annum** from 2016/17 to 2032/33.

5.5 Figure 22 at page 33 sets out a more detailed breakdown of the affordable housing need by dwelling size and tenure, which reports a rounded figure of 3,800 affordable dwellings over the 17-year period. Of these, 3,200 dwellings are required for affordable rented tenures, and 600 are required for affordable home ownership tenures. This is an approximate ratio of 84:16 between the tenures.

Affordable Housing Needs Assessment 2022 (CD 12.3)

5.6 The Affordable Housing Needs Assessment 2022 was prepared by Opinion Research Services and presents an updated affordable housing need calculation for the 12-year period from 2021/22 to 2032/33.

- 5.7 The calculation is summarised at Figure 34 at page 39, which states an overall need of 3,784 affordable dwellings over the 12-year period, or an average of **315 affordable dwellings per annum from 2021/22 to 2032/33**. This is an increase of 45% of the annual need identified in the previous SHMA Affordable Housing Update 2017.
- 5.8 Of these, 3,076 dwellings are required for affordable rented tenures, and 709 are required for affordable home ownership tenures. This is an approximate ratio of 82:18 between the tenures.
- 5.9 Further modelling has been undertaken at a sub-area level with a need being identified for 129 affordable dwellings in Buntingford over the 12-year period, or an average of 11 affordable dwellings per annum (Figure 38, page 41). Paragraph 4.17 at page 40 explains that this is based on a straightforward apportionment of the total housing need based on the existing settlement size rather than with any regard to the District Plan's development strategy or the relevant Housing Register data for each settlement (see Section 8 of this Proof of Evidence which discusses the data for Buntingford).

Commentary on the Assessments

- 5.10 I consider that both assessments are unduly stringent in respect their approach affordability. In assessing the needs for affordable housing for rent, both documents count only those households who are already in affordable housing, or in receipt of Housing Benefit, as being unable to afford their housing costs³.
- 5.11 This means that (for example) anybody living in the private sector who is ineligible for housing benefit will not be counted as being in need, no matter what proportion of their income they are spending on housing⁴.
- 5.12 The PPG makes clear⁵ that unmet needs for affordable housing include *"the number of households from other tenures in need [i.e. private tenures] and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration"*.
- 5.13 The Office for National Statistics considers housing costs to be affordable if they account for no more than 30% of a household's income. However, the approach taken in the AHNA means that households could be spending as much as 52% and not be counted as being in need – despite the fact they cannot afford their own home under the 30% threshold.

³ See paragraph 3.23 at page 26 of the SHMA Affordable Housing Update 2017 and paragraph 2.26 at page 13 of the AHNA 2022.

⁴ Unless that household is experiencing some other housing need other than unaffordability, e.g. overcrowded accommodation.

⁵ Paragraph 020, Reference ID: 2a-020-20190220

- 5.14 To illustrate this point⁶, Figure 10 at page 13 of the AHNA shows that a single person aged 35+ is eligible for housing benefit if they earn up to £17,670 a year. However, Figure 8 at page 11 of the AHNA shows that a lower quartile 1-bedroom property in East Herts costs £178.23 a week to rent (or £9,267.96 a year or 52 weeks). Somebody earning £1 over the benefit threshold (i.e. £17,671) will receive no housing benefit and will not be counted as being in housing need – but they would need to spend 52% of their income to meet their rental costs.
- 5.15 Additionally, the AHNA bases its assessment of affordable home ownership upon a nominal First Homes style model (i.e. a simple discount against open market values) and assumes households have savings of over £5,000 to hand. It does not take account of other models such as shared ownership, which are more flexible and allow for a lower deposit requirement.
- 5.16 On that basis, both the SHMA and AHNA need figures must be treated with some caution and only as minimum needs. Delivery above and beyond these figures is necessary if the needs of those households who are not counted as being need, yet are struggling with the costs of housing, are to be addressed.

⁶ Based on 2020/21 costs and earnings, as set out in the AHNA, i.e. 5 years ago.

Affordable Housing Delivery and Future Supply

Section 6

Introduction

- 6.1 This section of the Proof of Evidence analyses the delivery of affordable housing in East Herts. The Council's track record of delivery should be considered in the context of the ongoing affordability challenges faced by households in the District, as discussed in more depth in Section 7 of this Proof of Evidence.

Net Affordable Housing Delivery

- 6.2 Figure 6.1 below illustrates the net delivery of affordable housing in East Herts since the start of the District Plan period in 2011. These figures take account of Right to Buy sales in the District (the relevant calculations are set out at **Appendix JR6** of this Proof).

Figure 6.1: Net Affordable Housing Additions, East Herts, 2011/12 to 2024/25

Monitoring Year	Net Overall Housing Completions	Net Affordable Housing Additions	Affordable Housing Percentage
2011/12	383	161	42%
2012/13	699	187	27%
2013/14	366	40	11%
2014/15	503	111	22%
2015/16	674	121	18%
2016/17	620	159	26%
2017/18	464	179	39%
2018/19	908	192	21%
2019/20	952	318	33%
2020/21	805	266	33%
2021/22	872	196	22%
2022/23	887	235	26%
2023/24	1,388	436	31%
2024/25	778	254	33%
Total	10,299	2,855	28%
Average per annum	736	204	28%

Source: Freedom of Information Response; MHCLG Right to Buy Live Tables

- 6.3 Figure 6.1 shows that over the District Plan period, a total of 2,855 affordable dwellings have been completed in East Herts, equivalent to **204 net affordable dwellings per annum**, or **28% of net overall completions**.
- 6.4 The District Plan notes that affordable housing need accounted for 32% of the overall housing need, so the overall net delivery of 28% affordable housing is one-eighth below this, even though Policy HOU3 seeks at least 35% on qualifying sites.

Affordable Housing Delivery Compared to Identified Needs

SHMA Affordable Housing Update 2017 (CD 12.2)

- 6.5 Figure 6.2 below compares the net affordable housing delivery to the minimum needs identified in the SHMA Affordable Housing Update 2017 for 217 affordable dwellings per annum, as referred to at Section 14 of the District Plan.

Figure 6.2: Affordable Housing Additions Compared to Identified Needs (SHMA Affordable Housing Update 2017)

Monitoring Year	Net Affordable Housing Additions	Affordable Housing Need: 217dpa	Annual Surplus / Shortfall	Cumulative Surplus / Shortfall	Percentage of Needs Met
2016/17	159	217	-58	-58	73%
2017/18	179	217	-38	-96	82%
2018/19	192	217	-25	-121	88%
2019/20	318	217	+101	-20	147%
2020/21	266	217	+49	+29	123%
2021/22	196	217	-21	+8	90%
2022/23	235	217	+18	+26	108%
2023/24	436	217	+219	+245	201%
2024/25	254	217	+37	+282	117%
Total	2,235	1,953	+282	+282	114%
Average	248	217	+31	-	114%

Source: See Figure 4.1, SHMA Affordable Housing Update 2017

- 6.6 Figure 6.2 shows that there is presently a surplus of +282 affordable dwellings and 114% of the need has been met, when compared to the outdated assessment of need contained in the SHMA Affordable Housing Update 2017.

AHNA 2022 (CD 12.3)

- 6.7 Figure 6.3 below compares the net affordable housing delivery to the minimum needs identified in the more recent assessment of affordable housing need for 315 affordable dwellings per annum contained in the AHNA 2022.

Figure 6.3: Affordable Housing Additions Compared to Identified Needs (AHNA 2022)

Monitoring Year	Net Affordable Housing Additions	Affordable Housing Need: 315dpa	Annual Surplus / Shortfall	Cumulative Shortfall	Percentage of Needs Met
2021/22	196	315	-119	-119	62%
2022/23	235	315	-80	-199	75%
2023/24	436	315	+121	-78	138%
2024/25	254	315	-61	-139	81%
Total	1,121	1,260	-139	-139	89%
Average	280	315	-35	-	89%

Source: See Figure 4.1, AHNA 2022

- 6.8 Figure 6.3 shows that **there is now an accumulated shortfall of -139 affordable dwellings**, in contrast with the surplus that arose against the previous need figure contained in the SHMA Update 2017. This illustrates the rising pressure for affordable housing in East Herts – even though the average rate of delivery is higher over these four years compared to the District Plan period as a whole, there is still a material deficit in provision against identified minimum needs in the AHNA 2022.

The Future Supply of Affordable Housing

- 6.9 The future supply of affordable housing is highly uncertain. It is possible to estimate the extent to which the Council can meet its affordable housing needs into the future, based upon the deliverable housing land supply set out in the Council's housing trajectory.
- 6.10 The Council's trajectory for the period 2025/26 to 2029/30 is provided at **CD 11.3** (with a base date of 31 March 2025) and a Statement of Common Ground has been prepared setting out the parties' respective positions on the sites to be included in the housing land supply ().

The Approach to be taken to the Existing Shortfall

6.11 I consider that any shortfall in delivery should be dealt with within the next five years – this is known as the ‘Sedgefield’ method of dealing with housing shortfall. This is also an approach set out within the PPG⁷ and endorsed at appeal.

6.12 The critical importance of understanding the ability of the Council to meet future need was considered at a recent appeal at Heybridge, Maldon District (**CD 7.19**), which is in the neighbouring county of Essex. The Inspector comments on the uplift in delivery that would be needed to recover the accumulated shortfall, at paragraph 29 at page 4 of the decision:

“The Local Housing Needs Assessment (2021) [in Maldon] identifies a total need for 209 affordable dwellings per annum over a 20 year period from 2020 to 2040. The average to date lies at 89 affordable homes per annum, equivalent to 43% of identified needs. This raises the requirement for the 5-year period from 2024/25 – 2028/29 to an average of 305 affordable dwellings per annum to address the backlog.”

6.13 At paragraph 30, the Inspector observes that based on the prevailing trend in delivery, the Council would have little prospect of meeting that need:

“The gravity of the situation can be demonstrated by the Appellant’s illustration that if 40% of the future 5-year housing land supply came forward as affordable homes, this would equate to an average of 139 affordable dwellings. However, the current rolling average (gross) is just 21% of total housing completions. Based on that trend, 73 affordable homes per annum could be anticipated.”

6.14 At paragraph 32, the Inspector laments that: *“It is evident that past provision has failed to meet needs and that current needs are more apparent, serious and urgent”*.

6.15 In this context, it is imperative that the -139 dwelling affordable housing shortfall accumulated here in East Herts since 2021/22 against identified minimum needs is addressed as soon as possible and in any event within the next five years. In order to do this, the Council will need to deliver an extra 28 affordable dwellings per annum⁸ on top of the annual need for 315 affordable dwellings, equalling a total of 343 affordable dwellings per annum over the next five years.

⁷ Paragraph: 031 Reference ID: 68-031-20190722

⁸ 139 dwelling shortfall ÷ next 5 years = 28 dwellings per annum to recover the shortfall

The Extent of the Future Supply of Affordable Housing

- 6.16 I have undertaken a detailed review of the Council's housing trajectory, which includes a total of 4,553 dwellings over the period 2025/26 to 2029/30. This figure comprises:
- a. 3,033 dwellings from major developments with planning permission;
 - b. 650 dwellings from extant District Plan and Neighbourhood Plan site allocations;
 - c. 470 dwellings from small sites with planning permission; and
 - d. 400 dwellings from the windfall allowance.
- 6.17 From this, it is possible to find out how many affordable houses might be delivered from the qualifying sites (i.e. categories a. and b. listed above), by reviewing the relevant planning application documents for each site. Documents such as Section 106 agreements, officers' reports and detailed tenure plans can reveal the specific affordable housing contribution that is being made.
- 6.18 Sites in category c. are too small to qualify to provide affordable housing under Policy HOU3 and the same applies for unplanned windfall developments which typically come forward on small sites.
- 6.19 While some qualifying sites meet the full Policy HOU3 expectation of 40% affordable housing, others will not deliver the full amount, for example where it has been agreed that the proportion is not viable, or where prior approval is given.
- 6.20 **Appendix JR7** sets out my detailed review of the planning permissions contained in the Council's trajectory (**CD 11.3**), and **Appendix JR8** sets out a revised position taking account of the Statement of Common Ground (**CD 15.2**), which includes those sites where it is agreed that no clear evidence of deliverability has been provided, and those sites where the Appellant disputes the assumptions made within the Trajectory. On this basis (and not accounting for any potential future Right to Buy sales):
- a. The published trajectory indicates that a total of 1,179 affordable dwellings is likely to come forward over the five years 2025/26 to 2029/30, an average of **236 affordable dwellings per annum**; and
 - b. The Appellant's position indicates that a total of only 821 affordable dwellings is likely to come forward over the five years 2025/26 to 2029/30, an average of **164 affordable dwellings per annum**.

6.21 Neither figure is sufficient to meet the need set out in the AHNA 2022 for 315 affordable dwellings per annum.

6.22 Figure 6.4 below 'rolls forward' the projected affordable housing delivery until the end of the five year period in 2028/29, based upon the lower of these two figures of 164 affordable dwellings per annum. It reveals that the current shortfall of -139 affordable dwellings will not be recovered; on the contrary, it will widen to **-894 affordable dwellings by the end of 2029/30** and more households will not have their needs met.

Figure 6.4: Projected Future Delivery of Affordable Housing to 2029/30 Compared to Identified Needs (AHNA 2022)

Monitoring Year	Affordable Housing Additions		Affordable Housing Need: 315dpa	Annual Surplus / Shortfall	Cumulative Shortfall
	Actual (Net of RtB Sales)	Projected (Gross of RtB Sales)			
2021/22	196	-	315	-119	-119
2022/23	235	-	315	-80	-199
2023/24	436	-	315	+121	-78
2024/25	254	-	315	-61	-139
2025/26	↳	164	315	-151	-290
2026/27	-	164	315	-151	-441
2027/28	-	164	315	-151	-592
2028/29	-	164	315	-151	-743
2029/30	-	164	315	-151	-894
Total	1,941		2,835	-894	-894
Average	216		315	-99	-

Source: See Figure 4.1, AHNA 2022, Appendix JR8

6.23 It is clear that a step-change in affordable housing delivery is needed now, if the Council is to have any prospect of meeting its affordable housing needs into the future.

6.24 Waiting for the emerging Local Plan to provide a solution will leave households in need for longer, given that adoption is not expected for more than 2½ years in April 2029 at the earliest. By contrast, the appeal scheme presents an opportunity to grant planning permission now for up to 264 affordable dwellings, equivalent to almost one third of the projected shortfall, and capable of making a significant contribution to meeting the present and future housing needs of East Herts Council.

Summary of Affordable Housing Delivery

- 6.25 Since the start of the District Plan period in 2011/12, net affordable housing delivery has represented 28% of overall housing delivery at an average of 204 affordable dwellings per annum.
- 6.26 While a surplus of +282 dwellings has arisen against the outdated calculation of need contained in the SHMA Affordable Housing Update 2017 (217 affordable dwellings per annum) a shortfall of -139 affordable dwellings has arisen against the minimum needs contained in the more recent AHNA 2022 (315 affordable dwellings per annum).
- 6.27 The future prospects for affordable housing delivery in East Herts are bleak. Based upon the Council's published housing trajectory and taking account of both the agreed and disputed sites in the Statement of Common Ground, it is likely that future delivery of affordable housing will be around 164 to 236 affordable dwellings per annum between 2025/26 and 2029/30. Neither is enough to meet the identified minimum need for 315 affordable dwellings per annum. Based on the lower of these two figures, the existing shortfall of -139 dwellings will widen to -894 affordable dwellings by the end of 2029/30. Each one of these dwellings is a missed opportunity to accommodate a household in need.
- 6.28 In my opinion, it is clear that a 'step change' in affordable housing delivery is needed now in East Herts to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.29 In light of the identified current and future unmet needs there can be no doubt that the delivery of up to 264 affordable dwellings on the proposed site will make an important contribution towards meeting the affordable housing needs of the District.

Affordability Indicators

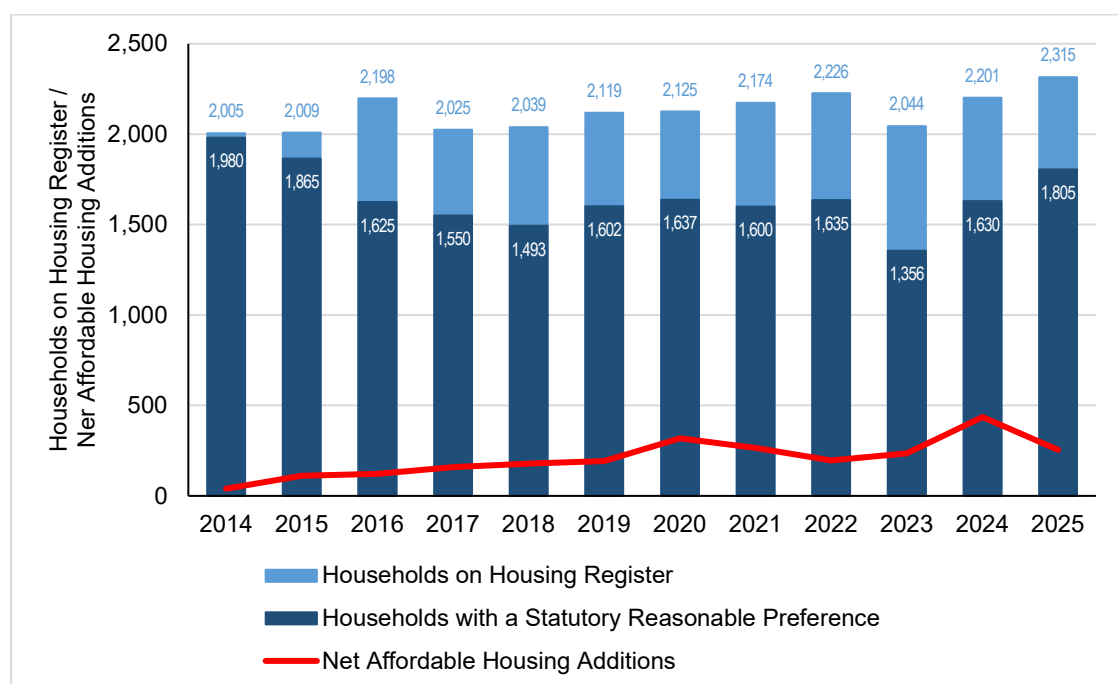
Section 7

7.1 Affordability indicators are an important part of understanding the ‘real world’ context for households seeking a home in East Herts now. They illustrate the pressure on the affordable housing stock, the use of temporary accommodation, as well as wider trends in house prices, rents and affordability. These factors will affect anybody who is presently seeking an affordable home to rent or buy.

Housing Register

7.2 The Council’s Freedom of Information response (**Appendix JR1**) shows that on 31 March 2025; there were **2,315 households on East Herts Council’s Housing Register**. Corresponding data published by MHCLG for the same date shows that 1,805 households have a statutory ‘reasonable preference’. Figure 7.1 shows the number of households on the Housing Register since 2014 (when a revised Housing Allocations Policy was introduced following the Localism Act 2011), the number of households with a ‘reasonable preference’, alongside the net delivery of affordable housing in East Herts.

Figure 7.1: Housing Register, East Herts, 2014 to 2025



Source: Freedom of Information Response; Figure 6.1 of this Proof; Local Authority Housing Statistics

- 7.3 Applicants with a ‘reasonable preference’ are those facing especially acute housing need and local authorities are required to give these applicants priority when allocating affordable housing. However, it is important to distinguish between statutory ‘reasonable preference’ applicants who are facing an acute housing need under the specified categories, and the broader NPPF definition of affordable housing as being for *“those whose needs are not met by the market”*.
- 7.4 It is a matter of some concern that the Housing Register has remained stubbornly above 2,000 households over the last 12 years since 2013. The current figure of 2,315 households is the highest it has been in the last 12 years, and similarly the current reasonable preference figure of 1,805 households is the highest in the last 10 years. Whilst affordable housing delivery has increased in recent years (a noticeable ‘uptick’ can be seen from 2022) that has not been reflected in the Housing Register which has risen too.

Temporary Accommodation

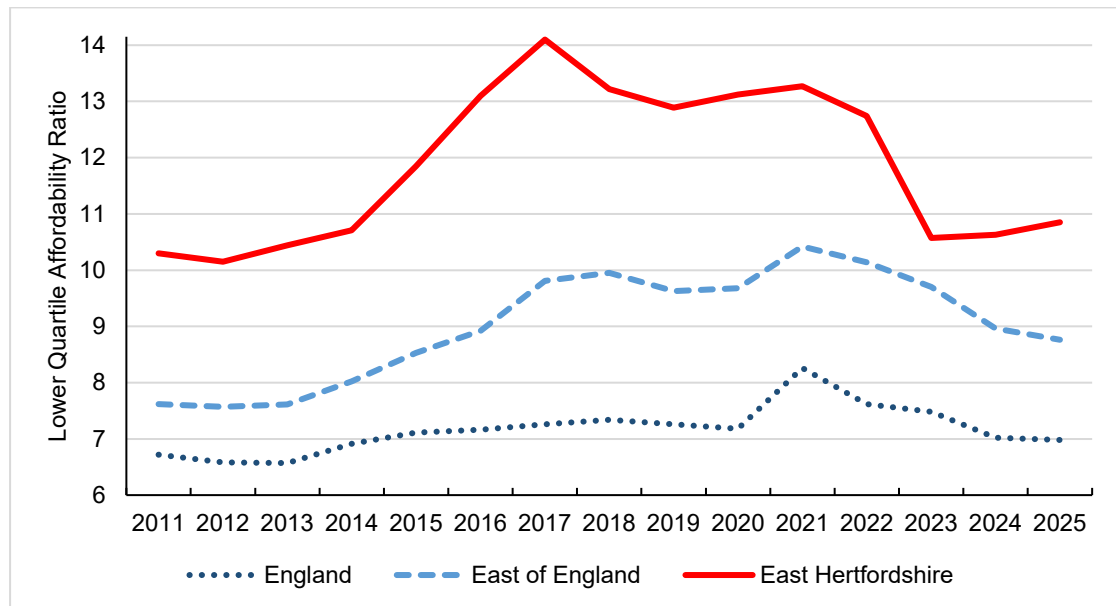
- 7.5 Households in temporary accommodation are facing the most severe consequences of the housing crisis, without a home of their own and placed in unstable, sometimes inadequate temporary accommodation. In some cases, households are placed in accommodation outside the authority area, meaning they can be some distance from family, schooling, employment and their wider support networks.
- 7.6 The Council’s Freedom of Information response shows that on 31 March 2025, 90 households were placed in temporary accommodation within East Herts District, and a further 86 households outside the District – a total of **176 households in temporary accommodation**.
- 7.7 The financial cost of temporary accommodation has been significant – the Freedom of Information response also shows that **East Herts Council spent £1,064,116.22 in 2024/25 on temporary accommodation**. The average amount spent per household was £3,491 per household placed within the District, and £2,367 outside the District.

Affordability Ratios

- 7.8 Housing affordability ratios illustrate the relationship between house prices and earnings i.e. how much does the average house cost, relative to the average earnings of somebody working in East Herts? For context, mortgage lending is typically available on up to 4.5 times earnings subject to individual circumstances.

- 7.9 Lower quartile (“LQ”) affordability ratios reflect lower incomes and cheaper homes so reflect the ‘entry level’ of the housing market.
- 7.10 In 2025, **the LQ house in East Herts cost 10.85 times LQ earnings**. This is 24% higher than the East of England ratio of 8.76 and 55% higher than the England ratio of 6.98. The LQ ratio in East Herts is 153% higher than, i.e. more than double, the 4.5 times benchmark for mortgage lending.

Figure 7.2: Lower Quartile Affordability Ratio, East Herts, 2011 to 2025



Source: Office for National Statistics

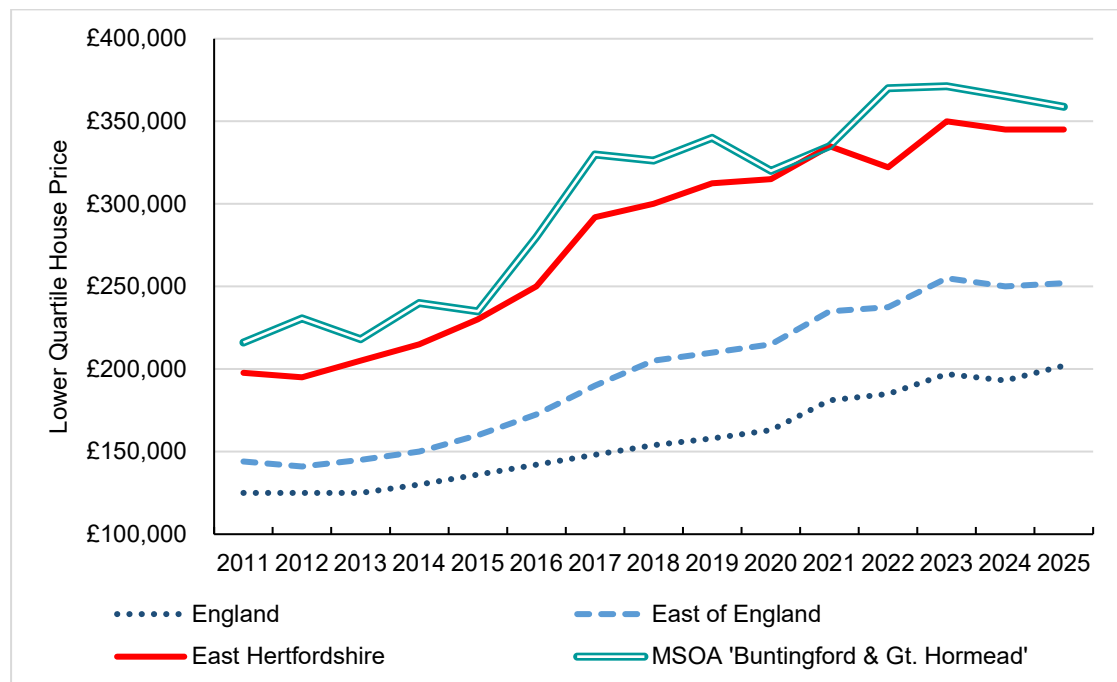
- 7.11 The LQ ratio in East Herts reached a peak in 2017 and although it has reduced since then, it is still higher than it was in 2011 at the start of the District Plan period (10.30).
- 7.12 Notably, over the three most recent monitoring years from 2023 to 2025, the LQ ratio in East Herts has increased (rising by 3% from 10.57 in 2023, to 10.85 in 2025) bucking the national and regional trends where the ratios have reduced. The LQ ratio remains substantially above the 4.5x benchmark and both the regional and national figures.

Lower Quartile House Prices

- 7.13 Figure 7.3 shows the LQ recorded selling price of houses in East Herts and the Buntingford local area (represented by the MSOA East Herts 001 ‘Buntingford & Great Horstead’) compared with those in the East of England and in England.
- 7.14 Lower quartile prices represent the cheaper ‘entry level’ of the housing market.

- 7.15 In 2025, the LQ house price in East Herts was **£345,000**. This is 37% higher than the East LQ price of £252,000 and 71% higher than the England median price of £202,000.
- 7.16 In 2025, the LQ house price in the Buntingford area was greater still at **£358,750**; this is 4% higher than in East Herts, 42% higher than in the East, and 78% higher than in England.

Figure 7.3: Lower Quartile House Prices, East Herts and Buntingford, 2011 to 2025



Source: House Prices Statistics for Small Areas

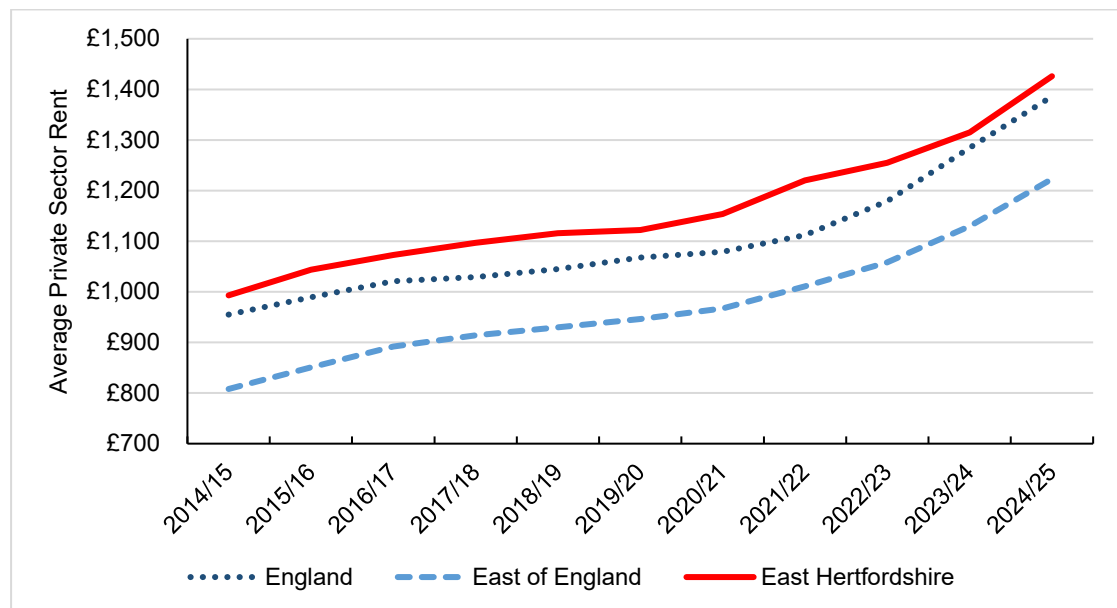
- 7.17 Between 2011 and 2025, the LQ house price in East Herts increased by 74% which is almost identical to the 75% increase in the East of England and faster than the 62% increase in England over the same period.
- 7.18 LQ house prices in the Buntingford area have tracked above those for East Herts (showing it is an expensive part of the District); between 2011 and 2025, the LQ house price in the area increased by 66%

Private Sector Rents

- 7.19 Figure 7.4 shows the mean average private sector monthly rent in East Herts, compared with those in the East and in England. These figures are taken from the new Price Index of Private Rents dataset published by the Office for National Statistics; they capture rental data from new and existing lettings (new tenancies are typically more expensive as landlords respond to prevailing market conditions).

- 7.20 In 2024/25, the mean private rent in East Herts was £1,426 per calendar month. This is 17% higher than the East mean rent of £1,223 and 3% higher than the England mean rent of £1,386. The mean rental prices for England are 'skewed' by very high rental prices in London and the surrounding commuter belt; notably, in 2025 East Herts had the 31st highest average rent of any local authority in England outside of London.

Figure 7.4: Mean Average Private Sector Rents, East Herts, 2014/15 to 2024/25



Source: Price Index of Private Rents

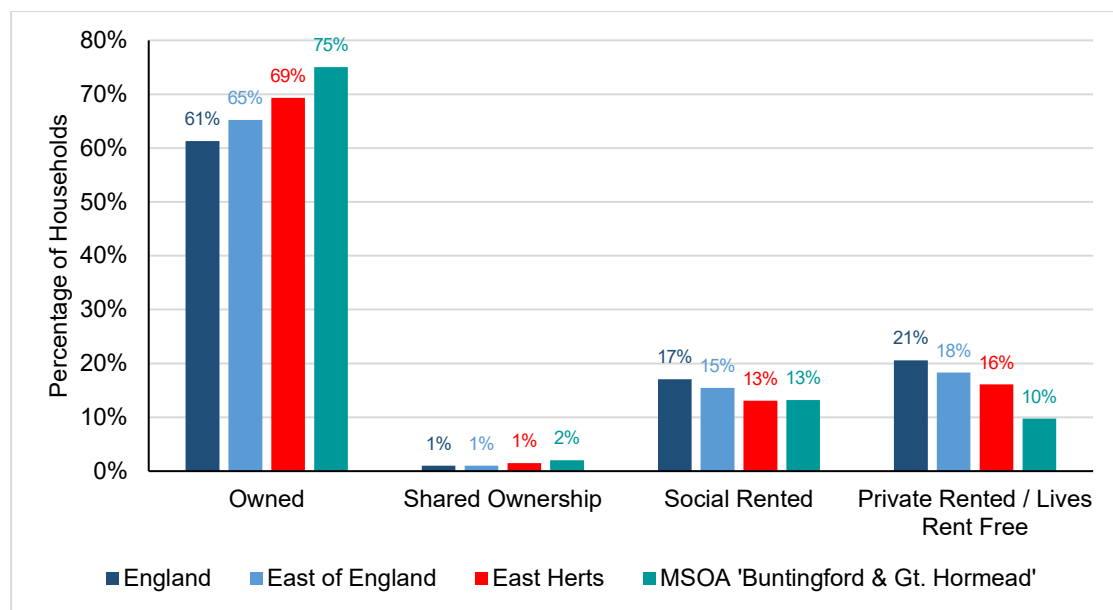
- 7.21 Rental price increases have accelerated in recent years. In East Herts, the average rent increased by £111 last year, from £1,315 in 2024 to the present figure of £1,426.

Tenure

- 7.22 Figure 7.5 overleaf shows the tenure split across East Herts and the Buntingford local area, compared with those for the East region and of England as a whole, based upon the information in the 2021 Census.

Continues overleaf...

Figure 7.5: Tenure, East Herts and Buntingford, 2021



Source: Census 2021

7.23 The tenure data shows that East Herts and Buntingford have much higher levels of owner-occupation, and correspondingly lower levels of social renting and private renting, than in the East of England and England as a whole. This means that there are comparatively far fewer opportunities to access a rented home, whether that is affordable or private. Even though the private rented sector is not providing affordable housing and comes with many drawbacks, it is at least accessible without the large up-front deposit required for owner-occupation.

7.24 Shared ownership accounts for a small proportion of households at all geographical levels, at around 1% in East Herts, the East of England and in England, rising to 2% in Buntingford.

Conclusions on Affordability Indicators

7.25 Analysis of market signals is critical in understanding the affordability of housing. The affordability indicators reveal the extent of the housing crisis in East Herts – a situation which underlines the need to deliver many more affordable homes.

7.26 The Housing Register has remained stubbornly above 2,000 applicants for the last 12 years; the latest figure of 2,315 households is the highest over this period. Of these, 1,805 households have a statutory 'reasonable preference' – almost three quarters of the Housing Register has an acknowledged priority housing need.

7.27 This sits against a backdrop where affordability ratios have remained well above those of England and the East across the District Plan period; a worsening affordability ratio

over the last three years; where there are high and rising house prices; and rapidly accelerating increases in private sector rents.

- 7.28 There is not a single indicator against which East Herts compares favourably with the East or with England.
- 7.29 My assessment is that East Herts is demonstrably an authority in the midst of an affordable housing crisis, and one in which I consider urgent action must be taken to deliver more affordable homes.

The Local Context for Affordable Housing in Buntingford

Section 8

- 8.1 It is important to consider the affordable housing needs of Buntingford. As Section 7 of this Proof of Evidence revealed, house prices in the Buntingford area have been persistently higher than in East Herts as a whole; meanwhile the local tenure mix shows there are fewer options to access rented homes in Buntingford than in East Herts or the national and regional average.

Housing Register – Local Preferences in 2024 and 2025

- 8.2 On 19 June 2024, the Council's Housing Strategy Officer provided comments on the proposed development (**CD 4.13**), including details of the local need for affordable housing in Buntingford as evidenced by the Housing Register. Key comments included:
- a. 516 households have expressed a locational preference for Buntingford; 123 of these households have an identified 'high housing need'⁹;
 - b. 267 of those households have dependent children;
 - c. In 2023/24, there were only 46 affordable housing lettings in Buntingford (just 9% of the overall preferences).
- 8.3 Although the figures are not directly comparable as the dates do not align, the 516 households with a locational preference on 19 June 2024 equates to 23% of the 2,201 households across East Herts counted three months previously on 31 March 2024.
- 8.4 Through the Freedom of Information request (**Appendix JR1**), the Council has supplied more up-to-date figures as of 31 December 2025, which show rising numbers of households on the Register overall, households with children and households with a 'high housing need'. All of these figures illustrate increasing pressure on the local housing stock:

⁹ The Council's Freedom of Information response confirms that a 'high housing need' refers to applicants with 100 or more priority points under the Council's housing allocations scheme.

- a. 687 households have expressed a locational preference for Buntingford; 149 of these households have an identified 'high housing need';
- b. 337 of these households have dependent children;
- c. In 2024/25, there were 43 affordable housing lettings in Buntingford (just 6% of the overall preferences).

8.5 In addition to the Housing Register, bidding data from the Choice Based Lettings scheme points towards high levels of demand for affordable housing in Buntingford, as illustrated in Figure 8.1 below.

Figure 8.1: Bids per Affordable Dwelling, Buntingford, 2024/25

Type of Affordable Property	Number of Properties Advertised	Average Bids per Property
1-bed affordable dwelling	13	60
2-bed affordable dwelling	18	43
3-bed affordable dwelling	12	111
4+ beds affordable dwelling	0	n/a

Source: Freedom of Information response

- 8.6 The data shows that each type of affordable dwelling has attracted an average of between 43 and 111 bids per dwelling, depending on the size of the property advertised. The highest number of bids was for 3-bedroom homes, which are most likely to be needed by households with dependent children. No 4-bedroom dwellings were advertised at all last year.
- 8.7 This illustrates the 'lottery' faced by applicants for affordable housing in Buntingford; for every successful household, tens or even hundreds of households will be left waiting for an affordable home.

Affordable Housing Delivery in Buntingford

- 8.8 Figure 8.2 below illustrates the net delivery of affordable housing in Buntingford since the start of the District Plan period in 2011. These figures do not take account of Right to Buy sales in Buntingford (such data is not recorded at the local level).

Figure 8.2: Net Affordable Housing Additions, Buntingford, 2011/12 to 2024/25

	Net Overall Housing Completions	Gross Affordable Housing Additions	Affordable Housing Percentage
2011/12	93	49	53%
2012/13	18	0	0%
2013/14	90	20	22%
2014/15	18	0	0%
2015/16	50	10	20%
2016/17	172	37	22%
2017/18	270	122	45%
2018/19	182	30	16%
2019/20	243	86	35%
2020/21	98	27	28%
2021/22	76	24	32%
2022/23	6	0	0%
2023/24	99	43	43%
2024/25	4	0	0%
Total	1,419	448	32%
Average	101	32	32%

Source: Freedom of Information response

- 8.9 Figure 8.2 shows that over the District Plan period, a total of 448 affordable dwellings has been completed in Buntingford, equivalent to 32 gross affordable dwellings per annum, or 32% of net overall completions. However, delivery has been weaker in recent years, with just 43 affordable dwellings delivered in the last three years.

The Pipeline of Affordable Housing in Buntingford

- 8.10 The proposed development does not come forward in isolation; other sites have recently been granted planning permission which will provide affordable housing.
- 8.11 I have reviewed the Council's Planning Register and identified four planning permissions proposing significant levels of housing in Buntingford. From this, it is possible to identify the contribution of affordable rented homes which could meet some of the 687 local preferences in Buntingford.

Figure 8.3: Review of Planning Permissions and Applications in Buntingford

Site Name and Applicant	Application Reference	Total dwellings	Affordable rented tenures	Affordable home ownership tenures	Notes
Land East of the A10 Vistry Homes	3/23/1447/OUT	350	105	35	S106 states 40% affordable, 75:25 tenure split
Land north of Hare Street Taylor Wimpey	3/24/0294/OUT	200	60	20	S106 states 40% affordable, 75:25 tenure split
Land off London Road and Owles Lane Wheatley Group Developments	3/23/1390/FUL	68	20	7	S106 states 40% affordable, 75:25 tenure split
Neale Drive Pigeon Land	3/22/1030/OUT	58	17	6	S106 states 40% affordable, 75:25 tenure split
Total		676	202	63	

Source: East Herts Council Planning Register

- 8.12 As Figure 8.3 shows, planning permission currently exists in Buntingford for 202 affordable rented dwellings, and a further 63 for affordable home ownership dwellings. This is a total of 265 affordable dwellings.
- 8.13 This potential future delivery is welcome but it falls short by some 70% of the 687 local preferences and falls short by 40% of the the 337 households with children on the Housing Register.
- 8.14 The proposed development includes up to 264 affordable rented dwellings – this will clearly make a substantial contribution towards meeting the unmet needs from the Housing Register.

The Weight to be Attached to the Proposed Affordable Housing

Section 9

- 9.1 To recap, the NPPF (**CD 5.16**) is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 9.2 Paragraph 61 of the NPPF sets out the Government's clear objective of "*significantly boosting the supply of homes*" before explaining that "*The overall aim should be to meet an area's identified housing need*".
- 9.3 The NPPF requires local authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, "*including those who require affordable housing*".

The Benefits of the Proposed Affordable Housing at the Appeal Site

- 9.4 The offer meets the requirements of adopted District Plan policy HOU3 (40%) of the East Herts District Plan (**CD 5.1**). It should be noted that this policy was drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 9.5 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD 7.20**) in September 2018 who was clear at paragraph 72 of their decision that:

"[I]n the light of the Council's track record, the proposals' full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit" (my emphasis).

- 9.6 Similarly, as recognised in a recent appeal decision in at Coombebury Cottage, Dunsfold (**CD 7.21**) "*the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs*".

The benefits of the proposed affordable homes at the appeal site should therefore be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.

- 9.7 The affordable housing benefits of the appeal scheme are therefore:
- a. Policy compliant offer of 40% (up to 264 dwellings) of the scheme provided as affordable housing;
 - b. A deliverable scheme which provides much needed affordable homes;
 - c. With the affordable homes managed by a Registered Provider;
 - d. Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation; and
 - e. Greater security of tenure than the private rented sector.
- 9.8 In my opinion these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.
- 9.9 An appeal that considers the issue of benefits is the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at Hawkhurst in Kent (**CD 7.22**). In critiquing the Council's views regarding the affordable housing benefits of the scheme, the Inspector made the following comments:

"The Council are of the view that the housing benefits of the scheme are 'generic' and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council's acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts on the most vulnerable people in the borough, who are unlikely to describe their needs as generic." (Paragraph 118)

- 9.10 I agree, the recipients of up to 264 homes here will not describe their needs as generic.

Relevant Appeal Decisions

- 9.11 The importance of affordable housing as a material consideration has been reflected by Inspectors in a wide range of appeal decisions.
- 9.12 Of particular interest is the amount of weight which has been attached to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance. I have

discussed appeals at Norton, Coombebury Cottage, Hawkhurst and Heybridge elsewhere in this Proof, but I draw particular attention to the findings of the below appeal in 2024 which is also in Buntingford.

Appeal Decision: Land East of A10, Buntingford (August 2024) (CD 7.1)

- 9.13 This appeal concerning development in Buntingford was determined around 18 months ago; it considered the weight to be attached to 40% affordable housing (up to 140 dwellings). I understand that the weight to be attached to the proposed affordable housing was disputed between the parties in that appeal.
- 9.14 The Inspector arrives at succinct conclusions at paragraph 69 at page 13 of the decision letter, explaining that *“The scheme also includes the delivery of 40% affordable housing. In the context of a need of 3,784 affordable dwellings over the period 2021-2033, I give this substantial weight”*. The need for 3,784 affordable dwellings is that identified in the AHNA 2022.
- 9.15 In allowing the appeal, the Inspector reaffirms this in the planning balance at paragraph 76 at page 14 explaining that the development *“would increase the delivery of affordable housing which I give substantial weight”* and again records at paragraph 78 that *“There would be significant benefits from the scheme from the delivery of market housing and substantial benefits in the delivery of affordable housing”*.
- 9.16 The Inspector is unequivocal in attaching substantial weight to the proposed 140 affordable homes in the case. Since the inquiry was held in July 2024, indicators of need have worsened¹⁰ and the shortfall in affordable housing provision has expanded¹¹. Furthermore, the present appeal offers up to another 124 affordable homes (up to 264 in total). This further underscores the need for affordable housing in East Herts and supports attaching substantial weight to the proposed affordable housing provision.

The Weight to be Attached to the Proposed Affordable Housing

- 9.17 It is my view that East Herts is facing a housing crisis, which calls for strong action to alleviate the very real effects that poor quality, overcrowded, insecure and expensive housing has upon real people in this District.
- 9.18 There is already a shortfall in delivery against the needs identified in the AHNA 2022 of -139 dwellings. The projected future supply of housing too in East Herts is unlikely

¹⁰ For example, the Housing Register (was 2,201 households in 2024, now 2,315); LQ affordability ratio (was 10.63 in 2024, now 10.85), average private sector rent (was £1,315 in 2024, now £1,426); see Section 7 of this Proof of Evidence)

¹¹ Under-delivery of -61 affordable dwellings in 2024/25, see Figure 6.3 of this Proof of Evidence.

to deliver enough affordable housing to meet these needs over the next five years, with the shortfall widening to as many as -894 dwellings by the end of 2029/30 based on the Appellant's housing land supply position.

- 9.19 The existing affordable housing stock is under clear strain. This is most starkly illustrated by the Housing Register data – where 2,315 households are presently on the Housing Register, of whom 1,805 have a statutory 'reasonable preference'. These figures are the highest in over a decade. In the meantime, an array of affordability indicators shows the pressure that exists in the housing market in East Herts, characterised by an affordability ratio that has worsened over the last three years; high house prices; and rapid acceleration in rental costs since 2020.
- 9.20 Housing Register data shows significant numbers of households are seeking (or would accept) an affordable home in Buntingford with a total of 687 preferences of whom 149 have a 'high housing need'. Planning permission exists for 202 affordable rented dwellings which would only meet the needs of 30% of these households who have expressed a preference for Buntingford. Further evidence on the pressure on the housing stock in Buntingford can be seen in the high number of bids received per affordable dwelling advertised on the Choice Based Lettings scheme.
- 9.21 The proposed development offers a substantial contribution of **up to 264 affordable homes**, in compliance with District Plan policy. I have no doubt that every one of these affordable homes will be occupied by a household in need. The grant of planning permission is, in my view, exactly the kind of strong action that is needed if we are to address this housing crisis.
- 9.22 Drawing the above factors together, it is my assessment that **the proposed affordable housing carries substantial positive weight in the determination of this appeal.**