

Appendices to the 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

PINS REF: 6008238

LPA REF: 3/24/0966/OUT

OUR REF: M26/0112-01.RPT

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Appendices

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Appendix JR1

Freedom of Information Response dated 14 January 2026)



[F25/1331]

From eastherts@infreemation.co.uk <eastherts@infreemation.co.uk>

Date Wed 14/01/2026 13:13

To Jamie Roberts <Jamie.Roberts@tetlow-king.co.uk>

Good afternoon,

Thank you for your request for information, this has now been processed and the information that we hold is enclosed.

Your Request

Request attached.

Our response

Housing Register

1. 2,315

2. This information is not held.

3. This information is not held.

4. Applicants can indicate any number of locations where they would consider bidding. They are not ranked in a preference order. At 31st December 2025 those indicating Buntingford as a preference:

Bedroom Need	Number of Households	Households including a dependent child	Households in High Housing Need
1-bed	319	3	30
2-bed	194	170	45
3-bed	141	131	61
4-bed	27	27	9
5-bed	6	6	4

5. Households with 100+ points.

6.

Type of affordable property	Buntingford 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

7. This information is available on our website here: [Adopted post HRA Housing Register Policy - April 2024.docx](#) . This notes changes from the previous policy of 2013.

Social Housing Stock

8. 294. While we have stock lists these are not exhaustive and not always accurate, i.e. not all homes were recorded when these were collected, and numbers change over time due to retained right to buy and new development. Retained right to buy applies to households who were originally Council tenants when they were transferred to a housing association who now wish to buy their homes. The figures are mainly based upon information from stock lists we hold from 2020, the last time these were updated.

Social Housing Lettings

9.

Location	Social Housing Lettings	
	1 April 2024 to 31 March 2025	1 April 2023 to 31 March 2024
Buntingford	43	54

Temporary Accommodation

10. Households move between accommodation – the numbers below reflect their last TA location throughout the year.

Households in Temporary Accommodation	31 March 2025	31 March 2024
Households placed within East Herts	90	98
Households placed outside East Herts	86	95
Total Households	176	193

11. Information is held on total spend. So can give an average per household. Spent £607,371.74. Average p/h £3,491

12. Information is held on total spend. So can give an average per household. Spent £456,744.48. Average p/h £2,367

Housing Completions over the District Plan period

13 - 16.

Monitoring Year	Q13 East Herts Total	Q14 East Herts Affordable	Q15 Buntingford Total	Q16 Buntingford Affordable
2011/12	383	166	93	49
2012/13	699	196	18	0
2013/14	366	68	90	20

2014/15	503	125	18	0
2015/16	674	133	50	10
2016/17	620	178	172	37
2017/18	464	182	270	122
2018/19	908	199	182	30
2019/20	952	324	243	86
2020/21	805	267	98	27
2021/22	872	200	76	24
2022/23	887	242	6	0
2023/24	1388	439	99	43
2024/25	778	256	4	0

If you are unsatisfied with the way the council has handled your request please let us know in the first instance so that an internal review can be carried out.

Additionally, if you have any queries about the processing of your request please do not hesitate to contact us on FOI@eastherts.gov.uk

For re-use of information and conditions on the use of personal data please see:

<https://www.eastherts.gov.uk/about-east-herts-0/information-requests/re-use-council-information>

Alternatively for more information on the Freedom of Information Act contact the Information Commissioner at:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone 0303 123 1113

<https://ico.org.uk/>

It is important that you include the above reference number on all correspondence related to this request.

Thank you for your request,

Information Governance and Data Protection Team
East Herts Council

Information Management Team
East Herts Council
www.eastherts.gov.uk
Telephone: +44 (0)1279 655261
Wallfields, Pegs Lane, Hertford, SG13 8EQ.

*Please note: Information released under the Freedom of Information Act may also be published on our website, along with details of the initial request.

Good afternoon,

I hope this email finds you well. I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in Buntingford, as well as the East Herts Council area.

Please see below the FOI request. Please let me know if you have any queries or require any clarification; I look forward to hearing from you within the relevant timescales. In the meantime may I take the opportunity to wish you an excellent festive season and a happy 2026.

Confirmation of receipt would be greatly appreciated.

Freedom of Information Request

Questions 1 to 12 of this request relate to data held by the Housing Department.
Questions 13 to 16 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on East Herts Council's Housing Register at 31 March 2025.
2. The average waiting times on 31 March 2025 for the following types of affordable property across East Herts:
 - a. 1-bed affordable dwelling;
 - b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.
3. The average waiting times on 31 March 2025 for the following types of affordable property in Buntingford:
 - a. 1-bed affordable dwelling;
 - b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.
4. The total number of households on the Council's Housing Register at 31 March 2025 specifying Buntingford as one of their preferred choices of location, including those with dependent children, and those considered by the Council to have a high housing need:

Bedroom Need	Number of Households	Households including a dependent child	Households in High Housing Need
1-bed			
2-bed			
3-bed			
4-bed			
5-bed			

5. Can the Council confirm the criteria that it uses to define a 'high housing need'.

6. The number of properties advertised, and the average number of bids per property over the 2024/25 monitoring period for the following types of affordable property in Buntingford:

Type of affordable property	Buntingford	
	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling		
2-bed affordable dwelling		
3-bed affordable dwelling		
4+ bed affordable dwelling		

7. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

Social Housing Stock

8. The total number of social housing dwelling stock on 31 March 2025 in Buntingford.

Social Housing Lettings

9. The number of social housing lettings in the period between 1 April 2024 and 31 March 2025; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	Social Housing Lettings	
	1 April 2024 to 31 March 2025	1 April 2023 to 31 March 2024
Buntingford		

Temporary Accommodation

10. The number of households housed in temporary accommodation within and outside East Herts on the following dates:

Households in Temporary Accommodation	31 March 2025	31 March 2024
Households placed within East Herts		
Households placed outside East Herts		
Total Households		

11. The amount of money spent on temporary accommodation per household within the East Herts area between 1 April 2024 to 31 March 2025.
12. The amount of money spent on temporary accommodation per household outside the East Herts area between 1 April 2024 to 31 March 2025.

Housing Completions over the District Plan period

13. The number of **NET** housing completions in the East Herts area broken down on a per annum basis for the period between 2011/12 and 2024/25.
14. The number of **NET** affordable housing completions in the East Herts area broken down on a per annum basis for the period between 2011/12 and 2024/25.
15. The number of **NET** housing completions in Buntingford broken down on a per annum basis for the period between 2011/12 and 2024/25.
16. The number of **NET** affordable housing completions in Buntingford broken down on a per annum basis for the period between 2011/12 and 2024/25.

Monitoring Year	Q13 East Herts Total	Q14 East Herts Affordable	Q15 Buntingford Total	Q16 Buntingford Affordable
2011/12				
2012/13				
2013/14				
2014/15				
2015/16				
2016/17				
2017/18				
2018/19				
2019/20				
2020/21				
2021/22				
2022/23				
2023/24				
2024/25				

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: a) Social rent; b) Other affordable housing for rent; c) Discounted market sales housing; and

	d) Other affordable routes to home ownership. ¹
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

I look forward to hearing from you. If there are any issues with providing any of the data then please get in touch.

¹ As defined by Annex 2 of the National Planning Policy Framework (2024) which can be viewed [here](#).

Appendix JR2

Extracts from National Planning Policy Framework (December 2024)



Extracts from National Planning Policy Framework (December 2024)

Appendix JR2

1. The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-taking processes.
2. The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) is to *“support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.”* (My emphasis).
3. At the heart of the NPPF is the presumption in favour of sustainable development contained at paragraph 11. Under paragraph 11c, proposals which accord with an up-to-date development plan should be approved without delay. Under paragraph 11d, where the most important policies are out of date, permission should be granted unless the policies in the NPPF provide a strong reason for refusal, or where any adverse impacts of the scheme significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.
4. The December 2024 revisions to the NPPF expand the decision-taker’s assessment under paragraph 11d to have *“particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”* (my emphasis). In doing so, the **NPPF now makes affordable housing a central part of applying the presumption to which the decision-taker must have particular regard.** ,
5. Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:

“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements

are addressed [...] The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community." (My emphasis).

6. It should be stressed that paragraph 61 identifies the 'overall aim' as to meet an area's identified housing need. Paragraph 62 clarifies that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."*
7. Paragraph 63 also makes clear that *"within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing..."* (My emphasis).
8. The NPPF places a core responsibility on all major developments (involving the provision of housing) to provide affordable housing. In particular, paragraph 66 establishes that *"where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures."*
9. Affordable housing is defined within the glossary of the NPPF (Annex 2) as *"housing for sale or rent, for those whose needs are not met by the market [...] and which complies within one or more of the following definitions"* before identifying four categories of affordable housing: Social Rent in accordance with Government's conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Appendix JR3

Extracts from Planning Practice Guide



Extracts from Planning Practice Guidance

Appendix JR3

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-006-20241212	This section sets out that assessments of housing need should include considerations of and be adjusted to address affordability. This paragraph sets out that <i>“an affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need.”</i> This is because: <i>housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed</i> <i>people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.</i> <i>“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”</i>
Housing and Economic Needs Assessment	018 Reference ID 2a-01820190220	Sets out that <i>“all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework”</i> .
Housing and Economic Needs Assessment	019 Reference ID 2a-01920190220	States that <i>“strategic policy making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments)”</i> .
Housing and Economic Needs Assessment	020 Reference ID 2a-02020190220	The paragraph sets out that in order to calculate gross need for affordable housing, <i>“strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:</i> <i>the number of homeless households;</i>

		• <i>the number of those in priority need who are currently housed in temporary accommodation;</i> • <i>the number of households in over-crowded housing;</i> • <i>the number of concealed households;</i> • <i>the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i> • <i>the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."</i>
Housing and Economic Needs Assessment	024 Reference ID 2a-02420190220	The paragraph states that <i>"the total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period"</i>. It also details that: <i>"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."</i>
Housing Supply and Delivery	022 Reference ID: 68-031-20190722	With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states: <i>"The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach)..."</i>
Housing Needs of Different Groups	001 Reference ID: 67-001-20190722	Sets out the relationship between affordable housing need and overall housing need: <i>"This need [for specific groups of people] may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method."</i>

Appendix JR4

Relevant Written Ministerial Statements



Relevant Written Ministerial Statements

Appendix JR4

1. A succession of Written Ministerial Statements (“WMS”) have underlined the importance of affordable housing to the Government’s housing ambitions and have recognised the *“acute and entrenched housing crisis”* across England.

“Building the Homes We Need” Written Ministerial Statement (30 July 2024)
(CD 12.4)

2. On 30 July 2024, the Secretary of State, Angela Rayner MP, delivered a WMS indicating the ‘direction of travel’ for the new Government’s intentions for national planning policy.
3. The WMS set out the Government’s aspirations to drive the delivery of affordable homes, stating that *“the Government are committed to the biggest growth in social and affordable housebuilding in a generation”* and setting an objective to deliver 1.5 million homes during the current Parliament.

“Building the Homes We Need” Written Ministerial Statement (12 December 2024) (CD 12.5)

4. In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government’s objective to deliver 1.5 million homes during the current Parliament and made a series of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

“This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters’ income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.” (my emphasis)

“Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing” Written Ministerial Statement (12 February 2025) (CD 12.7)

5. Another WMS from Matthew Pennycook MP once again references the scale of the housing crisis, but places specific emphasis on affordable housing, alongside the ambition to *“deliver the biggest increase in social and affordable housebuilding in a generation”*:

“England is in the grip of an acute and entrenched housing crisis. The detrimental consequences of this disastrous state of affairs are now all pervasive. We have a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into insecure, unaffordable and far too often sub-standard private rented housing; and 160,000 homeless children living in temporary accommodation.

Among the most important causes of the housing crisis is a failure over many decades to build enough homes of all tenures to meet housing demand and housing need.”

“Social and Affordable Housing Renewal” Written Ministerial Statement (2 July 2025) (CD 12.4)

6. The present-day Government has sought to bolster affordable housing delivery through the new Social and Affordable Homes Programme, which provides a £39bn funding package over the ten years from 2026/27 to 2035/36. This WMS acknowledges that *“Ending England’s acute and entrenched housing crisis will be a painstaking and laborious effort that will require focus, energy, and determination over many years”*.
7. The funding settlement includes new measures in respect of capital funding, access to finance, and rent-raising abilities, so that Registered Providers are better able to deliver affordable housing and to invest in affordable homes delivered through Section 106 planning obligations. The WMS outlines the objective to *“significantly improve the capacity of Registered Providers, enabling them to borrow and invest in new and existing homes. We also expect that improved financial capacity will see Registered Providers reassess their position in respect of uncontracted and unsold Section 106 units across the country”*.

Appendix JR5

The National Housing Crisis



The National Housing Crisis

Appendix JR5

Introduction

1. There is incontrovertible evidence that there is a national housing crisis in the UK affecting many millions of people, who are unable to access suitable accommodation to meet their housing needs. This section highlights some of this evidence and the response of successive Governments since 2011 to grappling with this issue.

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

2. 'Laying the Foundations: A Housing Strategy for England' was published on 21 November 2011, by the former Coalition government led by the Conservative Prime Minister David Cameron and the Liberal Democrat Deputy Prime Minister Nick Clegg. The foreword by Cameron and Clegg set out the former Coalition Government's intention to unblock the housing market and tackle the social and economic consequences of the failure to develop sufficient high-quality homes over recent decades.
3. The Executive Summary signed off by both the then Secretary of State for Communities and Local Government and the then Minister for Housing and Local Government included the following:
 - A thriving, active but stable housing market that offers choice, flexibility and affordable housing is stated as being critical to our economic and social wellbeing;
 - *"The problems we face are stark"* and have been compounded by the impact of the credit crunch;
 - *"Urgent action to build new homes"* is necessary as children will grow up without the opportunities to live near their family and older people will not have the choice and support, they need;
 - *"Housing is crucial for our social mobility, health and wellbeing"*;
 - *"Housing is inextricably linked to the wider health of the economy"*; and

- Fundamental to the whole approach of the strategy is communities (including prospective owners and tenants), landlords and developers working together.
4. Many of the measures proposed in 'Laying the Foundations' were taken forward in the following years and some remain in place to the present day. These include the introduction of the National Planning Policy Framework in 2012, the New Homes Bonus, changes to the Right to Buy, and the Help to Buy equity loan scheme which ran to 2023.

House of Commons Debate (October 2013) (CD 12.8)

5. A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply. Although the debate took place over ten years ago and under a different Government, the concerns remain prevalent and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in East Herts.
6. The then- Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:

"I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens."

7. When asked to clarify the word "crisis" by the Member for Tewkesbury, Mr Boles commented that in the preceding year the proportion of first-time buyers in England who were able to buy a home without their parents' help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and was approaching 40 in many parts of the country. He stated that the crisis "is intense within the south-east and the south, but there are also pockets in parts of Yorkshire".
8. In response to questions, Mr Boles reaffirmed that:

"Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it".

9. Mr Boles went on to say:

“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them.”

10. Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs for housing; and planning to provide for them.

“Bleak Houses: Tackling the Crisis of Family Homelessness in England”;
Children’s Commissioner, August 2019 (CD 12.9)

11. In August 2019 the Children’s Commissioner produced a report titled *“Bleak Houses: Tackling the Crisis of Family Homelessness in England”* to investigate the impact of homelessness and in particular the effect of this upon children.
12. The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms¹.
13. It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
14. The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that *“Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work”*.

¹ The Children’s Commissioner Report references a National Audit Office Report titled ‘Homelessness’ (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

15. The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a *“deeply disruptive impact on family life”*. This can include lack of support (from grandparents for example) and travel costs.
16. It found that a child’s education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children’s educational development can also be delayed.
17. Temporary accommodation also presents serious risks to children’s health, wellbeing, and safety. This is particularly so for families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
18. Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a *“significant impact on many aspects of their lives”*.

“Denied the Right to a Safe Home – Exposing the Housing Emergency”; Shelter, May 2021 (CD 12.10)

19. May 2021, Shelter published its report *“Denied the Right to a Safe Home – Exposing the Housing Emergency”* which sets out in stark terms the impacts of the affordable housing crisis. This succinct report, which accompanied the rebrand and relaunch of Shelter, sets out in stark terms the real-world effects of the housing crisis. Shelter estimates that some 17.5 million households nationally are affected in some way by the housing crisis:
20. At page 16, the report affirms that affordability of housing is the main cause of homelessness and sets out at page 10 that *“we will only end the housing emergency by building affordable, good quality social homes”*.
21. In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years, the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

“Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it’s damp, cramped, or away from jobs and support networks” (page 5)

“... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option” (page 5)

“The high cost of housing means the private-rented sector has doubled in size over the last 20 years [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability” (page 6)

“If you live in a home with damp and black mould on the walls, your health will suffer” (page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding” (page 12)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%)” (page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn” (page 25)

“Landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people” (page 29)

“The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing” (page 30).

22. Shelter estimates at page 32 of the report that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market.
23. The Report concludes at page 33 that for change to happen, *“we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there’s only one way to end the housing emergency. **Build more social housing**”* (emphasis in original).

‘More than Bricks’ Interim Report: The Human and Economic Impact of Social Homes, Shelter, September 2025

24. While there has been much commentary on the harmful consequences of the housing crisis (as demonstrated through the reports referenced in this section), the ‘More than Bricks’ report published by Shelter explores the benefits of good quality affordable housing based upon engagement with over 400 social housing tenants and 22 interviews with new tenants in the social rented sector.
25. The report identifies that social housing can help the mental health of its occupants, with 6-in-10 new social renters reporting an improvement to their mental health, for example due to less anxiety about their future housing, better sleep and eating habits. This is especially the case for those moving from temporary accommodation who may have been forced to share cramped spaces and inadequate cooking facilities.
26. The lower cost of social renting is also discussed, with 45% of new social tenants reporting that they can better afford their utility bills, and 35% of tenants now able to start saving money. Similarly, the report highlights that social tenants report a greater sense of belonging to their neighbourhood, improved relationships with neighbours and better opportunities for children to play.
27. The report concludes with a discussion of the opportunity costs of not delivering more affordable housing, which arises from improved employment, education, and tax receipts that could be realised if more affordable housing is delivered. It also discusses

the 'cascade' that happens when new affordable homes are built. For example, when an existing affordable tenant whose home no longer meets their needs is offered a new-build home, their existing home is then released to accommodate another household in need, which in turn releases another home that can accommodate a household presently in temporary accommodation.

A National Plan to End Homelessness, December 2025

28. The Government introduced this national homelessness strategy in December 2025, which sets out the actions that the Government intends to take to address homelessness.
29. The Ministerial Foreword by Steve Reed MP reaffirms the Government's intention that *"A good life, based on an affordable, secure and stable home, should be available to everyone in this country"*. But Reed laments that *"There's no more shameful testament to the housing crisis we inherited than the near record numbers of people sleeping in shop doorways and the 170,000 children stuck in temporary accommodation"*. Reed goes on to highlight the cost of temporary accommodation to the taxpayer – some £2.8 million in 2024 – and notes that addressing homelessness and its root causes is more effective and cost effective than a *"never-ending crisis response"*.
30. The Introduction sets out the context for homelessness at Section 1.1, with a series of charts and statistics in relation to rough sleeping, described as 'at near record levels' with 4,667 people estimated to be sleeping rough on a given night in Autumn. It also highlights the rising use of temporary accommodation nationally, with 132,410 households in TA on 30 June 2025 (a sharp increase compared to around 100,000 in 2020, and around 50,000 in 2010) including an alarming 172,420 children in TA.
31. Section 1.2 highlights the need for action, especially in respect of children's development and life chances. It notes the link between homelessness with school absences, declining GCSE attainment, harm to physical and mental health. Worse still, it explains that *"Devastatingly, between 2019 and 2024 74 children – of whom 58 were under the age of one – died in circumstances where temporary accommodation has been recorded as potentially having contributed to their death"*.
32. Section 1.4 sets out why homelessness has continued to rise since 2018 despite increasing funding. It highlights the role of affordable housing, explaining that *"without enough genuinely affordable homes, prevention efforts can only go so far"*. It also highlights rising levels of poverty and struggles to afford housing costs; and a recent focus on expensive crisis relief rather than long-term efforts to prevent homelessness.

This section identifies the role of affordable housing as part of the *“Long-term sustainable change to address the root causes of homelessness: building more homes, reforming renters’ rights, and tackling poverty”* that the Strategy envisages.

33. Pillar 1 ‘Universal Prevention’ deals specifically with the role of increased affordable housing supply, as part of the early action that is needed to make homelessness a rare occurrence. Section 2.1 sets out that *“Social housing provides vital support and security for low-income households, but decades of under-investment mean that supply is significantly lacking”*. It goes on to specify the actions that are being taken, including the new Social and Affordable Homes Programme and funding package; reforms to the Right to Buy; and strengthening of the Section 106 procedure for securing planning obligations.
34. The other pillars deal with a wide range of other actions that are proposed to alleviate homelessness, including making better use of the existing housing stock to meet acute housing needs; reforms to the benefits system and the national Living Wage; and other actions across government functions such as healthcare, social care, and support for veterans. It is clear from the Strategy that although tackling homelessness requires action across Government and in many different forms, the delivery of more affordable housing is an important part of the long-term plan to address homelessness.

Conclusions on the National Housing Crisis

35. There is an ever-increasing wealth of evidence including from figures at the highest levels of Government that unaffordability and inability to get on the housing ladder is a significant problem.
36. What is also clear is that the messages from previous Governments have failed to ensure enough new homes, especially affordable homes, are being built.
37. The evidence is clear and, in my opinion, demonstrates the pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable. This is very much a national housing crisis, but one which requires action at the local level across some 337 local planning authorities and through individual development management decisions.
38. Evidence suggests that failure to do so will present a risk to the future economic and social stability of the United Kingdom.

Appendix JR6

Calculation of Net Affordable Housing Additions



Calculation of Net Affordable Housing Additions

Appendix JR6

1. Figure 6.1 of my Proof of Evidence sets out the net affordable housing additions in East Herts, taking account of Right to Buy sales.
2. Below, I set out the calculation of these net figures, based upon the completions data provided to me through the Council's Freedom of Information Response (Appendix JR1) and the data on Right to Buy sales held by MHCLG.
3. The sale of -120 affordable dwellings over the 14 years of the District Plan period to date is equivalent to -9 sales per annum

Monitoring Year	Gross Affordable Housing Additions	Right to Buy Sales	Net Affordable Housing Additions
	A	B	A – B
2011/12	166	-5	161
2012/13	196	-9	187
2013/14	68	-28	40
2014/15	125	-14	111
2015/16	133	-12	121
2016/17	178	-19	159
2017/18	182	-3	179
2018/19	199	-7	192
2019/20	324	-6	318
2020/21	267	-1	266
2021/22	200	-4	196
2022/23	242	-7	235
2023/24	439	-3	436
2024/25	256	-2	254
Total	2,975	-120	2,855
Average per annum	213	-9	204

Appendix JR7

Review of the Future Supply of Affordable Housing – Published
Trajectory



Appendix JR7: Review of the Future Supply of Affordable Housing - Published Trajectory

Based on East Herts Council Housing Trajectory 2025/26 to 2029/30 (CD 11.3)

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Ref.	Application References	Address	Town	Net Dwellings Proposed	Net Dwellings in 5YHLS	Affordable Housing %	Affordable Housing Proposed	Affordable Housing in 5yrs	Commuted Sum	Source and Notes
Deliverable Part A: Major Development										
1	3/23/1447/OUT	Buntingford West, Land East of the A10, Buntingford, SG9	Buntingford	350	240	40%	140	96	n/a	3/23/1447/OUT S106 Definitions specify 40% dwellings to be affordable
2	3/22/1030/OUT	Neale Drive And Phillips Way, Buntingford	Buntingford	58	58	40%	23	23	n/a	3/22/1030/OUT S106 Definitions specify 40% dwellings to be affordable
3	3/19/1237/FUL	Land Between Hazel End Road And Farnham Road, Morbury Avenue, Bishops Stortford	Bishop's Stortford	50	50	40%	20	20	n/a	3/19/1237/FUL S106 Definitions specify 40% dwellings to be affordable
4	3/13/0804/OP	ASR's 1-4 Land at Bishop's Stortford North	Bishop's Stortford	2605	1054	35%	912	369	n/a	Officers Report for current RMA 3/25/0485/REM explains 30% secured through S106 originally, but new Eastern Neighbourhood parcels (under construction now) to provide 35% following viability reassessment
5	3/21/2339/REM; 3/20/0683/REM	ASR 5, Land at Bishop's Stortford North	Bishop's Stortford	479	47	40%	84	19	n/a	3/21/2339/REM - Phase D - Tenure Plan shows 84 affordable dwellings out of 207 (40%)
6	3/17/2588/OUT	Bishops Stortford Goods Yard, Station Road (BISH7)	Bishop's Stortford	641	318	10%	64	32	n/a	3/17/2588/OUT S106 Schedule 4 specifies 64 dwellings to be affordable
7	3/18/2253/OUT; 3/21/1807/REM; 3/21/2839/REM; 3/22/1704/REM; 3/23/1898/VAR; 3/23/1897/VAR; 3/23/2043/VAR; 3/23/0890/VAR	Land At Bishops Stortford South (BISH5) Whittington Way	Bishop's Stortford	794	138	40%	318	55	n/a	3/18/2253/OUT S106 Schedule 3 specifies 40% on all outline phases
8	3/23/1642/FUL	North of Hertford (HERT4)		118	0	n/a	n/a	0	n/a	no dwellings in 5yhls
9	3/14/0504/PO; 3/14/1386/FP	Yeomans Court, Ware Road	Hertford	25	14	n/a	n/a	0	n/a	Nil provision - 3/14/0504/PO is office-to-residential conversion, 3/14/1386/FP for 4 dwelling extension
10	3/18/2465/OUT; 3/23/2034/VAR	(HERT2) Land East Of, Marshgate Drive,	Hertford	375	275	15%	56	41	n/a	Officers Report on Variation of Condition 3/23/2034/VAR confirms 56 dwellings to be affordable.
11	3/18/2798/FUL	Bluecoat House, 9 Bluecoats Avenue	Hertford	15	15	n/a	n/a	0	n/a	Officers Report confirms nil provision due to viability
12	3/20/1931/FUL	Gates Of Hertford, Gascoyne Way, Hertford	Hertford	10	3	0	0	0	n/a	S106 does not include any provision for affordable housing
13	3/19/1045/OUT	Land North of the Stort Valley and A414 (Villages 1 - 6)	Gilston	8500	100	23%	1955	23	n/a	3/19/1045/OUT S106 'Core Principles' specifies 23% affordable housing on V1-6 land (also applies to application 3/19/2124/OUT below)
14	3/19/2124/OUT	Land Off Church Lane A414 (Village 7)	Gilston	1500	60	23%	345	14	n/a	3/19/1045/OUT S106 'Core Principles' specifies 23% affordable housing on V7 land (same S106 applies to this application 3/19/2124/OUT)
15	3/21/2615/FUL	27-29, High Street, Ware, SG12 9BQ	Ware	17	17	0	0	0	late stage review	3/21/2615/FUL S106 Schedule 3 provides for financial contribution although Officers Report indicates that development not viable and so contribution is an unspecified 'uplift' in the event viability improves
16	3/21/0498/FUL	Church Farm, Moor Green Road, Ardeley, SG2 7AH	Ardeley	11	11	n/a	n/a	0	n/a	Nil provision - holiday and staff accommodation
17	3/15/0260/FUL	Well House, Acorn Street	Hunsdon	11	6	25%	3	3	n/a	S106 Definitions specify 3 dwellings to be affordable. Assumed all 3 to be delivered in current 5 year period.
18	3/18/0329/FUL	Great Hadham Golf And Country Club, Great Hadham Road	Much Hadham	26	7	n/a	n/a	0	n/a	Nil provision - holiday accommodation
19	3/20/0502/OUT	Land and Buildings to the east of, Netherfield Lane, Stanstead Abbots, SG12 8HE	Stanstead Abbots	20	20	0	0	0	n/a	S106 does not include any provision for affordable housing
20	3/19/2211/FUL	Land at Home Farm, Munden Road, Dane End	Dane End	26	26	38%	10	10	n/a	S106 Definitions specify 10 dwellings to be affordable
21	3/19/0118/OUT; 3/21/2939/REM	Land East Of Stevenage, (EOS1) Gresley Way	Stevenage	712	500	40%	285	200	n/a	3/19/0118/OUT S106 Definitions specify 40% dwellings to be affordable
22	3/18/2764/OUT	Hertfordshire County Council Depot, Station Road, Watton At Stone, SG14 3SH		14	14	35%	5	5	n/a	3/18/2764/OUT S106 Schedule 2 specifies 35% affordable housing
23	3/23/2108/FUL	Walkern Road (WAS3 - Neighbourhood Plan Allocation)		60	60	40%	24	24	n/a	3/23/2108/FUL S106 Definitions specify 24 dwellings to be affordable

Ref.	Application References	Address	Town	Net Dwellings Proposed	Net Dwellings in 5YHLS	Affordable Housing %	Affordable Housing Proposed	Affordable Housing in 5yrs	Commuted Sum	Source and Notes
District Plan and Neighbourhood Plan Site Allocations										
24		Bishops Stortford High School (BISH6), London Road, Bishop's Stortford CM23 3LU		223	160	40%	89	83	n/a	3/25/0913/REM Submitted Tenure Layout shows 83 affordable dwellings out of 208 permitted
25		The Goods Yard, Bishop's Stortford		105	105	40%	42	0	n/a	3/22/1613/OUT application pending but undetermined. 40% affordable assumed
26		The Causeway		100	100	40%	40	48	n/a	3/25/1949/FUL application pending but undetermined. 48 affordable dwellings specified in description of development
27		Land East Of Marshgate Drive, Hertford		66	0	n/a	n/a	0	n/a	no dwellings in 5yhls
28		West of Hertford (North) (HERT3A)		342	150	40%	137	60	n/a	3/19/0790/OUT application pending but undetermined. 40% affordable assumed
29		Land North and East of Ware		1800	0	n/a	n/a	0	n/a	no dwellings in 5yhls
30		Land East of Welwyn GC		1350	0	n/a	n/a	0	n/a	no dwellings in 5yhls
31		Stevenage Road	Watton at Stone	60	0	n/a	n/a	0	n/a	no dwellings in 5yhls
32		(SAWB4) Land At Cambridge Road, Sawbridgeworth		184	135	40%	74	54	n/a	3/18/2735/FUL Section 106 Schedule 1 specifies 40% affordable
							Total	1,179		



Bold figures in this section are those specifically stated in Section 106 or other planning documentation

Light figures in this section have been calculated from those provisions

Italic figures have been estimated, assuming policy compliant levels of affordable housing

Appendix JR8

Review of the Future Supply of Affordable Housing – Appellant's Position



Appendix JR8: Review of the Future Supply of Affordable Housing - Appellant and SoCG Position

Based on **Appellant's Position** and **Agreed Changes** as set out in SoCG, 2025/26 to 2029/30 (CD 15.2)

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Ref.	Application References	Address	Town	Net Dwellings Proposed	Net Dwellings in 5YHLS	Affordable Housing %	Affordable Housing Proposed	Affordable Housing in 5yrs	Commuted Sum	Source and Notes
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2	3/22/1030/OUT	Neale Drive And Phillips Way, Buntingford	Buntingford	58	0	40%	23	0	n/a	3/22/1030/OUT S106 Definitions specify 40% dwellings to be affordable
3	3/19/1237/FUL	Land Between Hazel End Road And Farnham Road, Morbury Avenue, Bishops Stortford	Bishop's Stortford	50	50	40%	20	20	n/a	3/19/1237/FUL S106 Definitions specify 40% dwellings to be affordable
4	3/13/0804/OP	ASR's 1-4 Land at Bishop's Stortford North	Bishop's Stortford	2605	840	35%	912	294	n/a	Officers Report for current RMA 3/25/0485/REM explains 30% secured through S106 originally, but new Eastern Neighbourhood parcels (under construction now) to provide 35% following viability reassessment
5	3/21/2339/REM; 3/20/0683/REM	ASR 5, Land at Bishop's Stortford North	Bishop's Stortford	479	47	40%	84	19	n/a	3/21/2339/REM - Phase D - Tenure Plan shows 84 affordable dwellings out of 207 (40%)
6	3/17/2588/OUT	Bishops Stortford Goods Yard, Station Road (BISH7)	Bishop's Stortford	641	0	10%	64	0	n/a	3/17/2588/OUT S106 Schedule 4 specifies 64 dwellings to be affordable
7	3/18/2253/OUT; 3/21/1807/REM; 3/21/2839/REM; 3/22/1704/REM; 3/23/1898/VAR; 3/23/1897/VAR; 3/23/2043/VAR; 3/23/0890/VAR	Land At Bishops Stortford South (BISH5) Whittington Way	Bishop's Stortford	794	138	40%	318	55	n/a	3/18/2253/OUT S106 Schedule 3 specifies 40% on all outline phases
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27		Land East Of Marshgate Drive, Hertford		66	0	n/a	n/a	0	n/a	no dwellings in 5yhls
28		West of Hertford (North) (HERT3A)		342	0	40%	137	0	n/a	3/19/0790/OUT application pending but undetermined. 40% affordable assumed
29		Land North and East of Ware		1800	0	n/a	n/a	0	n/a	no dwellings in 5yhls
30		Land East of Welwyn GC		1350	0	n/a	n/a	0	n/a	no dwellings in 5yhls
31		Stevenage Road	Watton at Stone	60	0	n/a	n/a	0	n/a	no dwellings in 5yhls
32		(SAWB4) Land At Cambridge Road, Sawbridgeworth		184	135	40%	74	54	n/a	3/18/2735/FUL Section 106 Schedule 1 specifies 40% affordable
								Total	821	

Red highlight shows sites without clear evidence to demonstrate that they are deliverable, as agreed through the SoCG
Amber highlight shows sites where the Appellant considers a different build out rate applies

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Bold figures in this section are those specifically stated in Section 106 or other planning documentation

Light figures in this section have been calculated from those provisions

Italic figures have been estimated, assuming policy compliant levels of affordable housing