Tetlow King PLANNING

# Affordable Housing Statement

## Land to North of Little Green Lane

# Affordable Housing Statement

Outline Application: Construction of up to 600 residential dwellings (Use Class C3(a)), a 5-bedroom property for children's social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and café provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (All matters are reserved except for vehicular access).

Land to North of Little Green Lane, Croxley Green, Rickmansworth, WD3 3SR

Richborough

December 2024

OUR REF: M24/0511-01.RPT

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# Contents



# Appendices

# Introduction

## Section 1

1.1 This Affordable Housing Statement is prepared by **Tetlow King Planning** ("TKP") on behalf of **Richborough**. It examines the need for affordable housing in the Three Rivers District Council administrative area (where the application site is located), as well as the local need for affordable housing in Chorleywood North & Sarratt Ward.

1.2 Planning permission is sought for *"Outline Application: Construction of up to 600 residential dwellings (Use Class C3(a)), a 5-bedroom property for children's social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and café provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (All matters are reserved except for vehicular access)*".

1.3 The proposed development includes 50% (up to 300 units) on site affordable housing provision, which exceeds the requirements of Policy CP4 (45%) of the adopted Core Strategy (2011).

1.4 The proposed tenure split will be 70% Social Rent, 25% First Homes and 5% Shared Ownership which reflects the requirements of Policy CP4 of the Adopted Core Strategy. The proposed affordable housing will be secured by way of a Section 106 planning obligation.

1.5 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government.

1.6 This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF") (2024), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper.

1.7 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.8 This Affordable Housing Statement considers the need for affordable housing and the contribution that the proposed development can make towards meeting the affordable housing needs of the Three Rivers District Council administrative area and of Chorleywood North & Sarratt Ward.

1.9 It also takes account of a range of affordable housing indicators as well as consideration of national planning policy, performance against plan requirements, affordability issues, and the Council's own corporate objectives.

1.10 It concludes that there is a genuine and acute need for the proposed affordable homes now, and that **very substantial weight** should be attributed to the provision of affordable housing at the application site in the planning balance.

1.11 In undertaking this work, reliance has been placed upon data obtained through a Freedom of Information ("FOI") request to the Council which is included at **Appendix TK1** to this Statement.

1.12 This statement comprises the following five sections:

Section 2 reviews relevant Development Plan policies and other material considerations relevant to the site;

Section 3 provides analysis of affordable housing needs;

Section 4 examines past affordable housing delivery;

Section 5 identifies a range of affordability indicators; and

Section 6 sets out our conclusions and recommendations.

# The Development Plan and Related Policies

## Section 2

**Introduction**

2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

2.2 The relevant Development Plan in respect of affordable housing for the application site currently comprises the Three Rivers Core Strategy 2011 – 2026 (2011).

2.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the PPG (March 2014, ongoing updates), the Draft Sarratt Neighbourhood Plan, the Affordable Housing Supplementary Planning Document ("SPD") (2011) and a number of corporate documents which support the provision of affordable housing at the corporate level.

**The Development Plan**

**Three Rivers Core Strategy (2011)**

2.4 The Core Strategy sets out in broad terms how the Council plans to deliver new homes, jobs and infrastructure over the period to 2026. The Core Strategy replaced the Three Rivers Local Plan 1996-2011.

2.5 The Core Strategy was adopted before the introduction of the NPPF in 2012. Much of the content in the Core Strategy refers to the National policies of the PPS3 and RSS in force prior to the NPPF and is therefore out of date.

2.6 Chapter 2 of the Core Strategy provides the 'background and context' to Three Rivers District. At paragraph 2.2, a number of issued are highlighted in Three Rivers that need to be addressed. This includes:

> *"House prices in Three Rivers are very high and <u>affordability has been worsening.</u> Alongside the need to provide more housing to meet forecast housing growth, there is therefore a <u>particular need to achieve more affordable housing</u> and to provide more family sized affordable housing"* (emphasis added).

2.7 The Spatial Vision and Strategic Objectives of the Core Strategy are set out in Chapter 3. The Vision can be found at paragraph 3.2 and reads as follows:

> *"Looking forward to 2026 and beyond, the District will remain a prosperous, safe and healthy place where people want and are able to live and work."*

2.8 Nine priorities (a to i) are listed beneath the Spatial Vision on page eight, including priorities a) and c) which are of relevance to affordable housing:

> *"a) To provide growth required to support local communities and provide for their needs in the most sustainable way possible"*

> *"c) To improve access to housing and affordable housing for communities across the whole District."*

2.9 Twelve Strategic Objectives (S1 to S12) are presented at paragraph 3.3. Strategic Objective S5 on page 10 concerns affordable housing:

> ***"To increase levels of affordable housing in the District, prioritising the provision of social rented and larger family-sized homes***

> *<u>A step-change in the provision of affordable housing is needed in order to seek to meet the large, identified need for affordable housing in the District</u>. House prices are high relative to incomes in the District and a significant proportion of the population, particularly the young and those within the less affluent parts of the District, are unable to access housing in the general market. The lack of suitable and affordable housing within the District also has impacts on the ability of the District to attract and retain workers with impacts on key services and the local economy. <u>There is a very high need for affordable housing within the District,</u> but viability considerations mean that it will not be possible to meet all of this need within the period to 2026. The priority will therefore be social rented homes and larger family sized homes, as these are required to meet the most urgent housing needs within the District"* (emphasis added).

2.10 Chapter 4 of the Core Strategy sets out the Council's Place-Shaping Policies. This includes **PSP2 Development in the Key Centres (South Oxhey, Croxley Green, Abbots Langley, Chorleywood, Leavesden and Garston and Mill End)**, which states that development in these settlements will, among other points:

> "*Provide approximately 60% of the District's housing requirements over the Plan period to include approximately 45% of affordable housing."*

2.11 Chapter 5 of the Core Strategy contains the Council's Core Policies. Supporting text at paragraph 5.7 states that *"Providing sufficient housing to meet the needs of local communities in a sustainable way is one of the key challenges facing Three Rivers."* Development in the District needs to provide a range of types and sizes of homes to meet needs and needs to address local affordability issues.

2.12 Table 1, located at paragraph 5.9 of the Core Strategy, sets out housing supply and delivery is being monitored over the period 2001-2026. This aligns with the Council's monitoring framework at Appendix 7 of the Core Strategy.

2.13 'Addressing Local Affordability' is discussed from paragraph 5.25. Paragraph 5.25 echoes the comments made earlier at paragraph 2.2 that young people are having difficulty accessing housing on the open market and that house prices are very high in Three Rivers District.

2.14 Paragraph 5.38 recognises that *"It is clear from the evidence therefore that, in order to ensure affordability in the District in any meaningful way, a step-change in policy approach and affordable housing delivery is required."*

2.15 **Policy CP4 Affordable Housing** is the main affordable housing policy for Three Rivers District, requiring 45% affordable housing provision on all new developments resulting in a net gain of one or more dwellings.

2.16 As a guide, Policy CP4 seeks 70% of the affordable housing provided to be social rented and 30% to be intermediate, however the Council will treat each case on its merits when assessing the amount, type and tenure mix.

2.17 Appendix 7 of the Core Strategy provides a Monitoring Framework for each of the Place-Shaping and Core Policies. Observing the Monitoring Framework for Core Policy CP4, there is no target figure for the number of affordable homes to be delivered in Three Rivers District over the plan period.

**Other material considerations**

**Emerging Three Rivers Local Plan**

2.18 Three Rivers District Council is preparing a new Local Plan that will set out a vision and policy framework for the future levels of growth within the District up until 2038.

2.19 Between June 2021 and December 2023 the Council undertook a series of Regulation 18 Consultations. Most recently, Three Rivers District Council published an update on 18 October 2024 stating that it was pausing work on the new Local Plan due to proposed national policy changes.

2.20 Given the infancy of the emerging plan, it should be afforded limited weight in the planning balance.

**Draft Sarratt Neighbourhood Plan (2022)**

2.21 While the application site is geographically adjacent to the settlement of Croxley Green it falls within the designated area for the Sarratt Neighbourhood Plan.

2.22 Following consultation in Summer 2023, the Sarratt Neighbourhood Plan was submitted for Independent Examination in August 2023.

2.23 Section 5 of the Draft Neighbourhood Plan concerns Affordable Housing. Section 5 refers to a housing needs assessment undertaken by AECOM in January 2020 which identified that *"social rented homes for those on the lowest incomes are the greatest priority in Sarratt"*.

2.24 Page 35 also refers to a 2018 Parish Plan survey that indicated *"housing stock was in short supply and too expensive for family members to be able to stay in Sarratt".*

2.25 **Draft Policy 5 'Affordable Housing'**, presented on page 35 of the Draft Neighbourhood Plan, sets out that development proposals of 1+ units or over are required to deliver at least 40% affordable housing on site at a tenure split of 75% social rent and 25% First Homes/affordable shared ownership products.

**Affordable Housing Supplementary Planning Document (2011)**

2.26 The Affordable Housing SPD was approved at Executive Committee in June 2011. It provides guidance on the application of Core Strategy Policy SP4 'Affordable Housing'.

2.27 Chapters 1 and 2 of the SPD refer to the PPS3, RSS and previous evidence base documents. Much of this has since been superseded by the NPPF and later housing needs assessments. The SPD is therefore largely out of date.

2.28 This being said, while opening paragraph 1.1 of the SPD introduction is over 10 years old, it is still relevant in the context of today's housing market:

> *"Average house prices within Three Rivers are some of the highest in the country outside of London. <u>House prices are high relative to incomes</u> in the District resulting in a significant proportion of the population, particularly the*

*young and those within the less affluent parts of the District, being unable to access housing in the general market. The lack of suitable and affordable housing within Three Rivers impacts on the ability of the District to attract and retain workers with impacts on key services and the local community."* (My emphasis)

2.29 Paragraph 1.2 recognises that *"A step-change in the provision of affordable housing is therefore required in order to seek to meet the large, identified need for affordable housing. To address these issues, the provision of affordable housing to meet the needs of the local people is one of the Council's top corporate priorities…"*

2.30 The definitions set out in paragraphs 3.1 to 3.3 of the Affordable Housing SPD are now largely out of date and are superseded by those in Annex 2 of the NPPF (2024).

2.31 In discussing the tenure mix to be secured on site, paragraph 3.11 states that *"The tenure mix of affordable housing units on-site should reflect the identified local and District wide housing need and contribute towards a balanced housing market and the creation of mixed, integrated and sustainable communities."*

2.32 Paragraph 3.21 further explains that *"The overall balance of the type and size of affordable housing to be sought across the District will be informed by the Strategic Housing Market Assessment (SHMA) subject to local considerations on a site by site basis."*

2.33 Paragraph 4.5 of the SPD requires that "*Affordable housing requirements will be secured by planning obligations under Section 106 of the Town and Country Planning Act 1990 or, where appropriate, by planning conditions."*

**Corporate Documents**

2.34 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority of Three Rivers District. These include the following documents:

Three Rivers Corporate Framework 2023 – 2026;

Three Rivers Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028;

Three Rivers Community Strategy 2023 – 2028; and

Three Rivers Temporary Accommodation Placement Policy (December 2018, reviewed May 2024).

## Summary and Conclusions

2.35 The relevant Development Plan in respect of affordable housing for Three Rivers District currently comprises the Three Rivers Core Strategy 2011 – 2026 (2011).

2.36 The evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide 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 Three Rivers District.

2.37 The application proposals provide an affordable housing contribution which exceeds requirements of Core Strategy Policy CP4.

2.38 The up to 300 affordable homes at the application site will make a significant contribution towards the annual affordable housing needs of the District, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 4 of this Statement.

# Pre-Application Advice

## Section 3

**Introduction**

3.1 The applicant has sought pre-application advice during the preparation of this application. A Planning Assessment Note (dated August 2024) was submitted to the Council with the Council providing its pre-application response (ref: 24/1367/PREAPP) on 18 October 2024.

3.2 With relevance to affordable housing, consultations responses were provided by the Housing Team and the Local Plan Team.

**Pre-Application Response**

3.3 In discussing the principle of development, the Council states on page six of its response that *"The delivery of up to 600 dwellings would make a significant and positive contribution to much needed housing provision within the district. Additionally, there has been an undersupply of affordable housing within the district throughout the plan period and as such <u>there is a pressing need for the delivery of affordable housing</u>."* (my emphasis).

3.4 The response then acknowledges that *"The submitted planning statement sets out that **50%** of the dwellings would be affordable housing."*

3.5 Affordable Housing is discussed in further depth on page nine where the Council clarifies that *"Policy CP4 of the Core Strategy requires development that would result in a net gain of one or more dwellings to contribute to the provision of affordable housing. The Policy sets out that the Council will seek an overall provision of 45% of all new housing as affordable housing, incorporating a mix of tenures."*

3.6 The affordable housing offer is therefore in excess of policy requirements and will make an even more positive contribution to the "pressing need".

3.7 In terms of the affordable housing tenure split, the Council advises that as a result of the introduction First Homes, the tenure mix for affordable housing under Policy CP4 of the Core Strategy (2011) is 25% First Homes, 70% social rented, and 5% intermediate."

3.8 Furthermore, the response advises that the highest need for affordable housing in the District is for social rented properties and that the *"delivery of 100% social rented properties of the rented accommodation is strongly encouraged and would weigh in favour of the proposal."*

3.9 The application proposes an affordable housing tenure mix of 70% Social Rent, 25% First Homes and 5% Shared Ownership. Therefore the recommended mix is met in full, including the delivery of 100% social rented housing as the rental proportion of the affordable tenure mix.

3.10 In setting out the proposed benefits of the scheme, the Council has set out that it *"accepts that it has a 1.9 year housing land supply and that there is an <u>acute need</u> for both market, <u>affordable housing</u> and self-build."*

**Conclusion**

3.11 The applicant has sought to proactively engage with Three Rivers District in preparing this application to ensure that the proposals meet the requirements of the Development Plan.

3.12 As is shown in this section of this Statement, the proposal responds positively to the requirements of the Development Plan with regard to affordable housing. The proposal of 50% affordable housing provision on site is a substantial contribution which responds to the pressing need for affordable housing in Three Rivers District.

# Affordable Housing Needs

## Section 4

**Introduction**

4.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the District.

**The Development Plan**

4.2 The adopted Development Plan does not define a numerical target for the provision of affordable homes. Instead, the adopted Core Strategy (Policy CP4) seeks 45% affordable housing provision from qualifying developments.

4.3 In the absence of a defined affordable housing target figure in adopted and/or emerging policy, it is important to consider the objectively assessed need for affordable housing within the most up-to-date assessment of local housing need.

**Housing Market Assessments**

4.4 Three Rivers District have published three Housing Market Assessments since the production of the Core Strategy, each of which demonstrates a severe lack of affordable housing delivery in Three Rivers District, with the net annual need increasing in each successive study. These are summarised in date chronological order below.

**London Commuter Belt (West) Sub-Region Strategic Housing Market Assessment (2008) (published 2010)**

4.5 The 2008 Strategic Housing Market Assessment ("SHMA") forms part of the housing evidence base for the adopted Three Rivers Core Strategy (2011). The 2008 SHMA provides an assessment of the housing (market and affordable) requirement for Three Rivers District over the remainder of the Core Strategy period until 2021.

4.6 The 2008 SHMA pre-dates the NPPF and was informed by the now defunct Planning Policy Statement 3: Housing ("PPS3") definitions and requirements, and the Regional Spatial Strategies ("RSS"). The PPS3 affordable housing definition has since been superseded by the NPPF (2024) Annex 2 definition for affordable housing which includes a wider variety on tenures to meet specific needs.

4.7 Figure 156 on page 166 of the 2008 SHMA identifies a net need for 3,100 intermediate affordable homes and another 1,200 affordable rented homes between 2007/08 and 2020/21 in Three Rivers District; a total of 4,300 net affordable homes. Aggregated on a per annum basis over the 14-year period, this gives a net affordable housing need figure of **307[1] affordable homes per annum** in Three Rivers District between 2007/08 and 2020/21.

**South West Hertfordshire Strategic Housing Market Assessment (2016)**

4.8 The purpose of the 2016 SHMA was to develop a robust understanding of housing market dynamics in Three Rivers and to provide an assessment of future needs for both market and affordable housing for different groups within the population.

4.9 Table 39 titled on page 112 of the 2016 SHMA identifies a need for **357 net affordable homes per annum** in Three Rivers District between 2013/14 and 2035/36, equivalent to 8,211[2] net affordable dwellings over the period.

4.10 The 2016 SHMA was produced prior to the revision of the NPPF definition of affordable housing in 2018 which was broadened to include a wider variety on tenures to meet specific needs. The level of affordable housing need identified by the 2016 SHMA should therefore be treated as a minimum figure.

**South West Hertfordshire Local Housing Needs Assessment (2020)**

4.11 The 2020 South West Hertfordshire Local Housing Needs Assessment ("LHNA") was commissioned to assess future development needs for housing across South West Hertfordshire over the 2020-2036 period to help inform strategic and local planning activities, including the production of the Three Rivers Emerging Local Plan.

4.12 The 2020 LHNA provides two separate assessments of affordable housing need; affordable/social rented housing need and affordable home ownership housing need.

4.13 Table 37 on page 89 of the 2020 LHNA identifies a net need for **350 affordable/social rented homes per annum** in Three Rivers District between 2020 and 2036, equivalent to 5,600[3] net affordable/social rented dwellings over the 16-year period.

[1] 4,300/14 = 307.14
[2] 357*23 = 8,211
[3] 350*16 = 5,600

4.14 Table 37 on page 97 of the 2020 LHNA identifies a net need for **162 affordable home ownership homes per annum** in Three Rivers District between 2020 and 2036, equivalent to 2,592[4] net affordable/social rented dwellings over the 16-year period.

4.15 Combining the affordable/social rented need and the home ownership need figures, the 2020 LHNA identifies a net need for **512[5] affordable homes per annum** over the 2020 to 2036 period, equivalent to a total of 8,192[6] net affordable/social rented dwellings over the 16-year period.

4.16 The 2020 LHNA provides the most up to date assessment of affordable housing needs in Three Rivers District and was produced following the revisions to the NPPF definition of affordable housing.

**Conclusions on Affordable Housing Needs**

4.17 There is a clear and on-going pressing need for more affordable homes in Three Rivers District. The up to 300 affordable homes proposed on the application site would make a meaningful contribution to meet the affordable housing needs of Three Rivers District, which the council accept is an acute and pressing need.

[4] 162*16 = 2,592
[5] 350+162 = 512
[6] 512*16 = 8,192

# Affordable Housing Delivery

## Section 5

**Introduction**

5.1 This section of the Statement analyses the delivery of affordable housing in Three Rivers District. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the District.

**Past Affordable Housing Delivery**

5.2 Figure 5.1 illustrates the delivery of affordable housing ("AH") in Three Rivers District since the start of the Core Strategy monitoring period in 2001/02.

*Figure 5.1: Gross Additions to Affordable Housing Stock, 2001/02 to 2023/24*

| Monitoring Period | Total Housing Completions (Net) | Additions to AH Stock (Gross) | Gross AH as a %age of total completions |
|---|---|---|---|
| 2001/02 | 381 | 71 | 19% |
| 2002/03 | 255 | 91 | 36% |
| 2003/04 | 186 | 42 | 23% |
| 2004/05 | 94 | 18 | 19% |
| 2005/06 | 229 | 57 | 25% |
| 2006/07 | 369 | 123 | 33% |
| 2007/08 | 286 | 13 | 5% |
| 2008/09 | 351 | 83 | 24% |
| 2009/10 | 48 | 0 | 0% |
| 2010/11 | 107 | 25 | 23% |
| 2011/12 | 185 | 55 | 30% |
| 2012/13 | 176 | 39 | 22% |
| 2013/14 | 142 | 48 | 34% |
| 2014/15 | 285 | 93 | 33% |
| 2015/16 | 215 | 85 | 40% |
| 2016/17 | 144 | 0 | 0% |
| 2017/18 | 264 | 90 | 34% |
| 2018/19 | 149 | 22 | 15% |
| 2019/20 | 406 | 82 | 20% |
| 2020/21 | 99 | 91 | 92% |
| 2021/22 | 154 | 34 | 22% |
| 2022/23 | 204 | 61 | 30% |
| 2023/24 | 260 | 3 | 1% |
| **Total** | **4,989** | **1,226** | **25%** |
| ***Avg. Pa.*** | **217** | **53** | **25%** |

*Source: Freedom of Information response (13th June 2024)*

5.3 Between 2001/02 and 2023/24, a total of 4,989 dwellings were delivered in Three Rivers District, equivalent to 217 per annum. Of these, 1,226 dwellings were affordable tenures, equivalent to 53 per annum. This equates to 25% gross affordable housing delivery.

5.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy ("RtB") sales from existing Council and Registered Provider ("RP") affordable housing stock.

5.5 Figure 5.2 below calculates the affordable housing delivery per annum since the start of the Core Strategy monitoring period in 2001/02, net of Right to Buy sales. A net loss of 475[7] affordable dwellings over this period equates to 10% of the gross affordable housing completions of 4,989 affordable dwellings over the 23-year period.

[7] (327 + 148) – 0 = 475 dwellings

*Figure 5.2: Net of Right to Buy Additions to Affordable Housing Stock, 2001/02 to 2023/24*

| Monitoring Period | Total housing completions (Net) | Additions to AH Stock (Gross) | LPA Acquisitions | LPA RtB sales | RP RtB sales | Additions to AH Stock (Net of RtB) | Additions to AH Stock (Net of RtB) as a %age of total completions |
|---|---|---|---|---|---|---|---|
| | ***A*** | ***B*** | ***C*** | ***D*** | ***E*** | ***F*** ***(B + C) - (D + E)*** | ***G*** ***(F / A) X 100*** |
| 2001/02 | 381 | 71 | 0 | 57 | 0 | 14 | 4% |
| 2002/03 | 255 | 91 | 0 | 77 | 0 | 14 | 5% |
| 2003/04 | 186 | 42 | 0 | 75 | 0 | -33 | -18% |
| 2004/05 | 94 | 18 | 0 | 33 | 0 | -15 | -16% |
| 2005/06 | 229 | 57 | 0 | 28 | 0 | 29 | 13% |
| 2006/07 | 369 | 123 | 0 | 39 | 0 | 84 | 23% |
| 2007/08 | 286 | 13 | 0 | 18 | 0 | -5 | -2% |
| 2008/09 | 351 | 83 | 0 | 0 | 0 | 83 | 24% |
| 2009/10 | 48 | 0 | 0 | 0 | 0 | 0 | 0% |
| 2010/11 | 107 | 25 | 0 | 0 | 0 | 25 | 23% |
| 2011/12 | 185 | 55 | 0 | 0 | 4 | 51 | 28% |
| 2012/13 | 176 | 39 | 0 | 0 | 32 | 7 | 4% |
| 2013/14 | 142 | 48 | 0 | 0 | 11 | 37 | 26% |
| 2014/15 | 285 | 93 | 0 | 0 | 34 | 59 | 21% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 2015/16 | 215 | 85 | 0 | 0 | 9 | 76 | 35% |
| 2016/17 | 144 | 0 | 0 | 0 | 8 | -8 | -6% |
| 2017/18 | 264 | 90 | 0 | 0 | 12 | 78 | 30% |
| 2018/19 | 149 | 22 | 0 | 0 | 10 | 12 | 8% |
| 2019/20 | 406 | 82 | 0 | 0 | 8 | 74 | 18% |
| 2020/21 | 99 | 91 | 0 | 0 | 6 | 85 | 86% |
| 2021/22 | 154 | 34 | 0 | 0 | 2 | 32 | 21% |
| 2022/23 | 204 | 61 | 0 | 0 | 12 | 49 | 24% |
| 2023/24 | 260 | 3 | 0 | 0 | 0 | 3 | 1% |
| **Total** | **4,989** | **1,226** | **0** | **327** | **148** | **751** | **15%** |
| ***Avg. Pa.*** | **217** | **53** | **0** | **14** | **6** | **33** | **15%** |

*Source: Freedom of Information response (13th June 2024); Live Table 691; Registered Provider Statistical Data Returns*

5.6 Figure 5.2 demonstrates that on average between 2001/02 and 2023/24, the Council has added just 33 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 15% of the total average number of net housing completions.

5.7 The above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Three Rivers faster than the replacements from acquisitions.

5.8 At a national level almost two million households have exercised their Right to Buy since it was introduced in 1980. In her WMS of 30 July 2024, the incoming Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:

> *"Over the last five years, there has been an average of 9,000 council Right to Buy sales annually, but only 5,000 replacements each year. Right to Buy provides an important route for council tenants to be able to buy their own home. But the discounts have escalated in recent years and councils have been unable to replace the homes they need to move families out of temporary accommodation."*

5.9 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal[8] at Land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019. Paragraph 14.108 of the Inspector's Report sets out that:

> *"Mr Stacey's unchallenged evidence shows that only 2,757 new affordable homes were provided in the City over the first 6 years of the plan period. <u>This represents less than half of the target provision and a net increase of only 151 affordable homes if Right to Buy sales are taken into account.</u> On either measure there has been a very low level of provision against a background of a pressing and growing need for new affordable homes in Birmingham"* (emphasis added).

5.10 This was later endorsed by the Secretary of State who stated that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.

5.11 The seriousness of the impact was considered in an article in the Independent newspaper in June 2020. The article is attached as **Appendix TK2**. The reporter considered how Council housing sell-off continues as government fails to replace most homes sold under Right to Buy.

[8] APP/P4605/W/18/3192918

5.12 It advised that, “*Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show*.” It went on to say that “*Housing charities warned that enough “desperately needed” genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show”.*

5.13 The articles goes on to quote Jon Sparkes, chief executive at homelessness charity Crisis, who said: “*These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.”*

5.14 It is important, therefore, that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account to reflect the actual level of affordable houses available.

5.15 The recent comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

**Affordable Housing Delivery Compared to Affordable Housing Needs**

5.16 Figure 5.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need of 512 net affordable dwellings per annum between 2020 and 2036, as set out in the 2020 South West Hertfordshire LHNA.

*Figure 5.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2020 LHNA, 2020/21 to 2023/24*

| Monitoring Year | Additions to AH Stock (Net of RtB) | 2020 LHNA AH Needs (Net) | Annual Shortfall | Cumulative Shortfall | Additions as a %age of Needs |
|---|---|---|---|---|---|
| 2020/21 | 85 | 512 | -427 | **-427** | 17% |
| 2021/22 | 32 | 512 | -480 | -907 | 6% |
| 2022/23 | 49 | 512 | -463 | -1370 | 10% |
| 2023/24 | 3 | 512 | -509 | -1879 | 1% |
| **Total** | **169** | **2,048** | **-1,879** | | **8%** |
| ***Avg. Pa*** | **42** | **512** | **-470** | | **8%** |

*Source: Freedom of Information response (13th June 2024); Live Table 691; Registered Provider Statistical Data Returns; 2020 LHNA*

5.17 Since the start of the 2020 LHNA period in 2020/21, affordable housing completions (net of Right to Buy) have averaged just 42 net affordable dwellings per annum, against a need of 512 net affordable dwellings per annum. A shortfall of 1,879 affordable dwellings has arisen over the four-year period, equivalent to an average annual shortfall of -470 affordable dwellings.

**Affordable Housing Delivery in Chorleywood North & Saratt Ward**

5.18 Figure 5.4 below illustrates the delivery of affordable housing in Chorleywood North & Saratt Ward since the start of the Core Strategy monitoring period in 2001/02.

** continued overleaf **

*Figure 5.4: Gross Additions to Affordable Housing Stock in Chorleywood North & Saratt Ward, 2001/02*

| Monitoring Year | Total Housing Completions (Net) | Additions to AH stock (Gross) | Gross affordable additions as a %age of total completions |
|---|---|---|---|
| 2001/02 | 9 | 0 | 0% |
| 2002/03 | 9 | 0 | 0% |
| 2003/04 | 3 | 0 | 0% |
| 2004/05 | 5 | 0 | 0% |
| 2005/06 | 26 | 0 | 0% |
| 2006/07 | 16 | 0 | 0% |
| 2007/08 | 11 | 0 | 0% |
| 2008/09 | 11 | 0 | 0% |
| 2009/10 | -2 | 0 | 0% |
| 2010/11 | 19 | 0 | 0% |
| 2011/12 | 5 | 0 | 0% |
| 2012/13 | 13 | 0 | 0% |
| 2013/14 | 13 | 0 | 0% |
| 2014/15 | 0 | 0 | 0% |
| 2015/16 | 18 | 0 | 0% |
| 2016/17 | 5 | 0 | 0% |
| 2017/18 | 6 | 0 | 0% |
| 2018/19 | 4 | 0 | 0% |
| 2019/20 | 11 | 0 | 0% |
| 2020/21 | 9 | 0 | 0% |
| 2021/22 | 40 | 0 | 0% |
| 2022/23 | 4 | 0 | 0% |
| 2023/24 | 13 | 0 | 0% |
| **Totals** | **248** | **0** | **0%** |
| ***Avg. Pa.*** | ***11*** | ***0*** | |

*Source: Freedom of Information response (13th June 2024)*

5.19 Over the 23-year period between 2001/02 and 2023/24 there have been a total of 248 net overall housing completions in Chorleywood North & Saratt Ward. The Council concedes in its response at Appendix TK1 that according to their records there have been *“no affordable housing completions within Chorleywood North & Saratt Ward between 2000/01 and 2023/24.”* Losses existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.

**Summary and Conclusions**

5.20 The above evidence demonstrates that across Three Rivers District the delivery of affordable housing has fallen persistently short of meeting identified needs.

5.21 In the 23-year period since the start of the Core Strategy monitoring period in 2001/02, net of Right to Buy affordable housing delivery represented just 15% of overall housing delivery, equating to just 33 affordable dwellings per annum.

5.22 Against the level of affordable housing need identified the 2020 SHMA there has been a shortfall in delivery of 1,879 affordable dwellings over the four-year period between 2020/21 and 2023/24, equivalent to an average annual shortfall of -470 affordable dwellings.

5.23 Delivery on a local level is poorer still as there have been no affordable homes delivered in Chorleywood North & Saratt Ward since the start of the Core Strategy monitoring period in 2001/02.

5.24 It is clear that a ‘step change’ in affordable housing delivery is needed now in Three Rivers District to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.

5.25 In light of the identified level of need there can be no doubt that the delivery of up to 300 affordable dwellings on the proposed site will make an important contribution to the acute and pressing affordable housing needs of Three Rivers District.

# Affordability Indicators

## Section 6

### Introduction

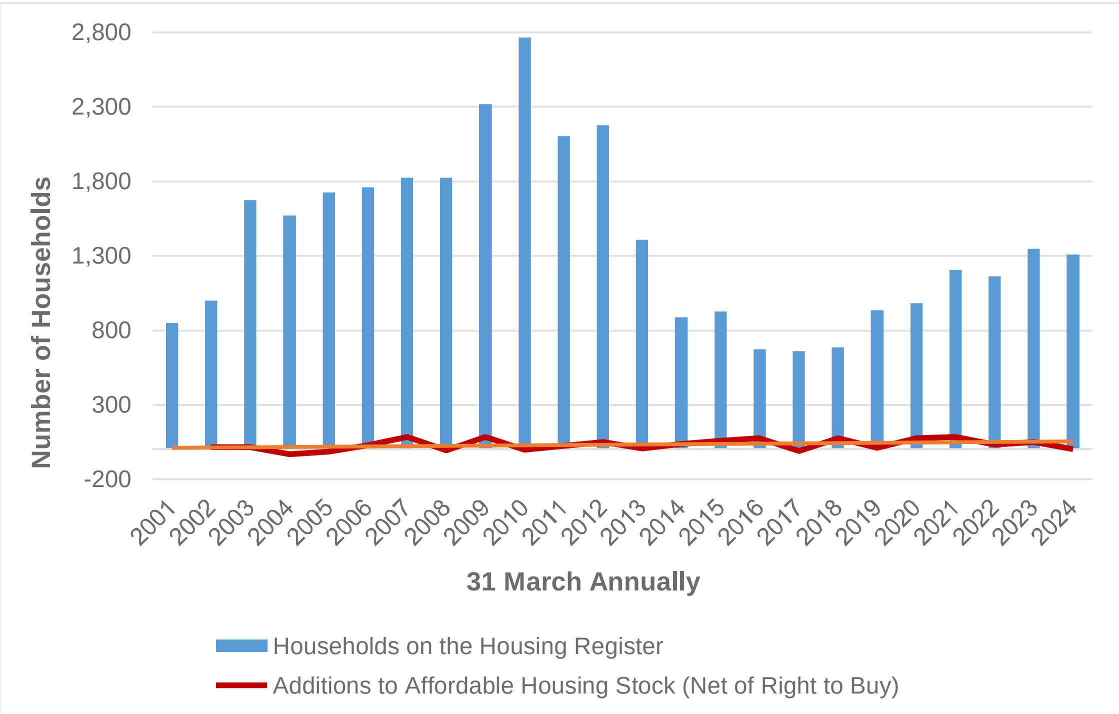
6.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.

### Housing Register

6.2 The Council's Freedom of Information response (**Appendix TK1**) confirms that on 31 March 2024 there were 1,310 households on the Housing Register.

6.3 Figure 6.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Three Rivers District since the start of the Core Strategy monitoring period in 2001.

*Figure 6.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2001/02 to 2023/24*




*Source: MHCLG Open Data and Freedom of Information Response (13 June 2024)*

6.4 As Figure 5.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Three Rivers District since 2001/02.

6.5 Footnote 3 of MHCLG[9] Live Table 600 highlights that:

> *"The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, has contributed to a rise in the size of waiting lists. The Localism Act 2011 has contributed to a decrease in the size of waiting lists, as it allowed local authorities to set their own qualification criteria. Since households can be on the waiting list of more than one local authority, there is the potential for double counting."*

6.6 Evidently the result of the Localism Act is that many local authorities, including Three Rivers District, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

6.7 Following the changes brought about by the Localism Act, Three Rivers District published a revised Housing Allocations Scheme in **2013** which received further revisions in **2020 and 2022**.

6.8 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.

6.9 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF Annex 2 definitions, i.e. social rented, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

6.10 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, TKP suggest, the Government intends to assist by increasing the range of affordable housing types in the NPPF.

[9] Department for Levelling Up, Housing and Communities

6.11 As such, the number of households on the Housing Register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

**Housing Register Bids and Lettings**

6.12 Figure 6.2 below demonstrates average number of bids per property in Chorleywood North & Sarratt Ward over the 2022/23 monitoring period for a range of types of affordable property.

*Figure 6.2: Bids Per Property in Chorleywood North & Sarratt Ward, April 2023 to March 2024*

| Type of Affordable Property | No. Properties Advertised | Average Bids Per Property |
|---|---|---|
| 1-bed affordable dwelling | 1 | 42 |
| 2-bed affordable dwelling | 0 | n/a |
| 3-bed affordable dwelling | 0 | n/a |
| 4+ bed affordable dwelling | 0 | n/a |

*Source: Freedom of Information Response (13 June 2024)*

6.13 Figure 6.2 demonstrates that that there was just one affordable dwelling advertised for let in Chorleywood North & Sarratt Ward in the 2023/24 monitoring period. This was a 1-bed affordable dwelling that received 42 bids from households in affordable housing need. No 2-bed, 3-bed or 4+bed affordable homes were advertised for let in the ward in the 2023/24 monitoring period.

6.14 Appendix TK1 confirms that over the 2023/24 monitoring period there was **just one social housing lettings in Chorleywood North & Sarratt Ward.**

6.15 For every successful letting, there are clearly tens, if not hundreds of households who have missed out and are left waiting for an affordable home. Evidently, there is a clear and pressing need for affordable homes within the Chorleywood North & Sarratt Ward this is not being met.

**Temporary Accommodation**

6.16 Figure 6.3 below shows that at 31 March 2024, there were 57 households housed in temporary accommodation within the Three Rivers District region. Three Rivers District Council has a responsibility to house these households.

6.17 Furthermore, an additional 16 households were housed in temporary accommodation outside the Three Rivers District region at 31 March 2024. Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network.

*Figure 6.3: Temporary Accommodation, 2023 and 2024*

| Households in Temporary Accommodation | 31 March 2023 | 31 March 2024 |
|---|---|---|
| Households Housed within Three Rivers District Council | 51 | 57 |
| Households Housed outside Three Rivers District Council | 10 | 16 |
| **Total Households** | **61** | **73** |

*Source: Freedom of Information (13 June 2024)*

6.18 Figure 6.3 also shows that the number of households in temporary accommodation has increased by 20% over the past year, from 61 households in 2023 to 73 households in 2024.

6.19 The *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* report published in August 2019 by the Children's Commissioner found that temporary accommodation presents serious risks to children's health, wellbeing, and safety, particularly 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.

6.20 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*".

**Homelessness**

6.21 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 229 households in need of homelessness prevention duty[10], and a further 66 households in need of relief duty[11] from the Council.

6.22 The Council's Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028 confirms on pages 9-11 that "*overall demand on the Housing Service has increased by 50% since 2017"*, and that following the Covid-19 pandemic *"a significant increase in enquiries can be seen post 2019/20."*

6.23 The Strategy also clarifies that "*Data indicates that the primary reason for the council to accept the homelessness duty towards a household is due to an eviction by a family member (parents/extended family) or friend. This is followed closely by the eviction of a household from a property in the private rented sector."*

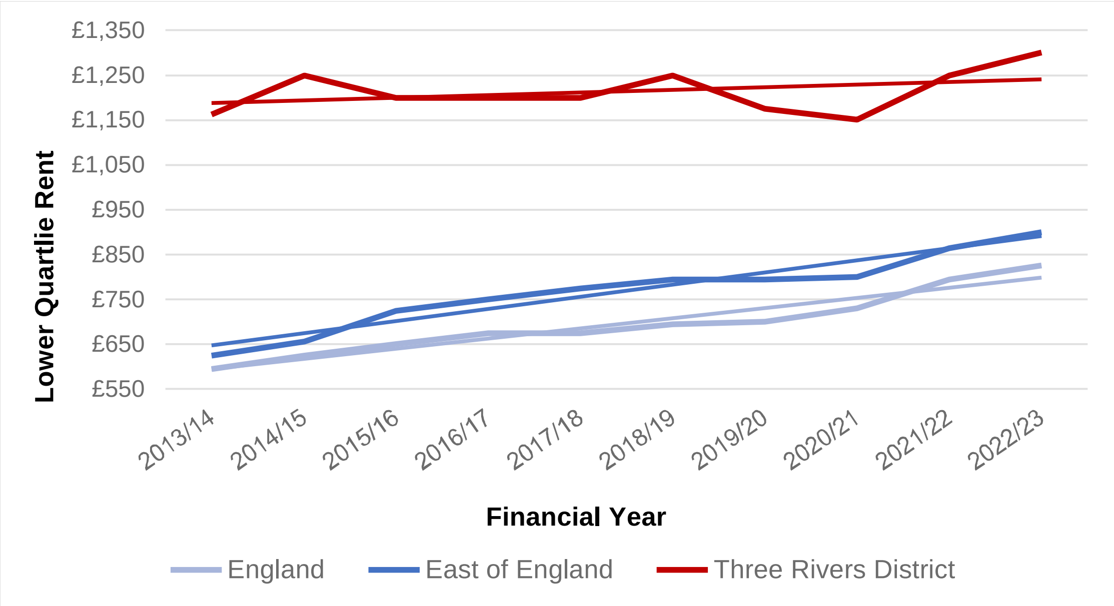
**Private Rental Market**

6.24 Lower quartile private sector rents are representative of the 'entry level' of the private rented sector and include dwellings sought by households on lower incomes.

6.25 Valuation Office Agency ("VOA") and Office for National Statistics ("ONS") data (first produced in 2013/14) show that average lower quartile monthly rents in Three Rivers stood at £1,100 per calendar month ("pcm") in 2022/23. This represents a 22% increase from 2013/14 where median private rents stood at £900 pcm.

[10] The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
[11] The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

*Figure 6.4: Lower Quartile Private Sector Rents, 2013/14 to 2022/23*




*Source: VOA and ONS.*

6.26 A lower quartile rent of £1,100 pcm in 2022/23 is 50% higher than the East of England figure of £735 pcm and 76% higher than the national figure of £625 pcm. It should also be noted that since the start of the 2020 LHNA period lower quartile rents in Three Rivers have increased by 13%.

6.27 It is important to note that VOA/ONS rental data is calculated using all transaction data i.e., existing lets as well a new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Three Rivers.

**Lower Quartile House Prices**

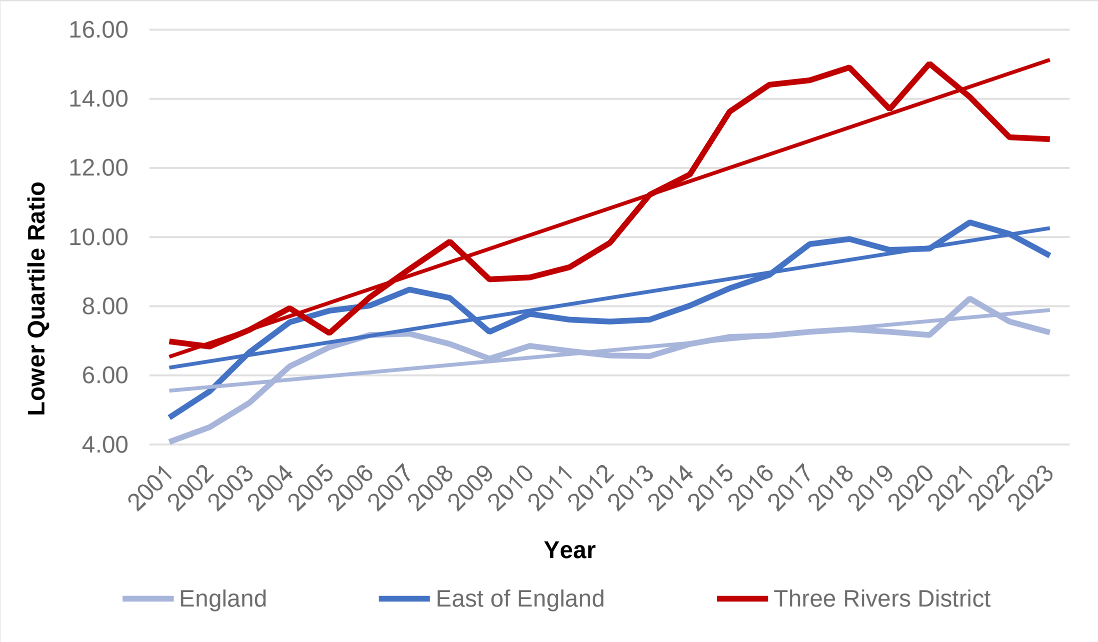
6.28 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in Three Rivers in 2023 stood at **12.83**[12]**,** an 84% increase since the start of the Core Strategy monitoring period in 2001 when it stood at 6.98.

6.29 This means that those on lower quartile incomes in Three Rivers, seeking to purchase a lower quartile priced property, now need to find almost 13 times their annual income to do so.

[12] For comparison, the median affordability ratio in 2023 was 12.11. This is 6% lower than the lower quartile ratio of 12. 83, but 51% higher than the figure of 8 times average incomes which was described as a problem by the former Prime Minister in the foreword to the White Paper entitled 'Fixing our broken housing market' in 2017.

6.30 The ratio in Three Rivers stands substantially above the national average of 7.25 (+77%) and significantly above the East of England average of 9.46 (+36%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.

*Figure 6.5: Lower Quartile Workplace-Based Affordability Ratio comparison, 2001 to 2022*

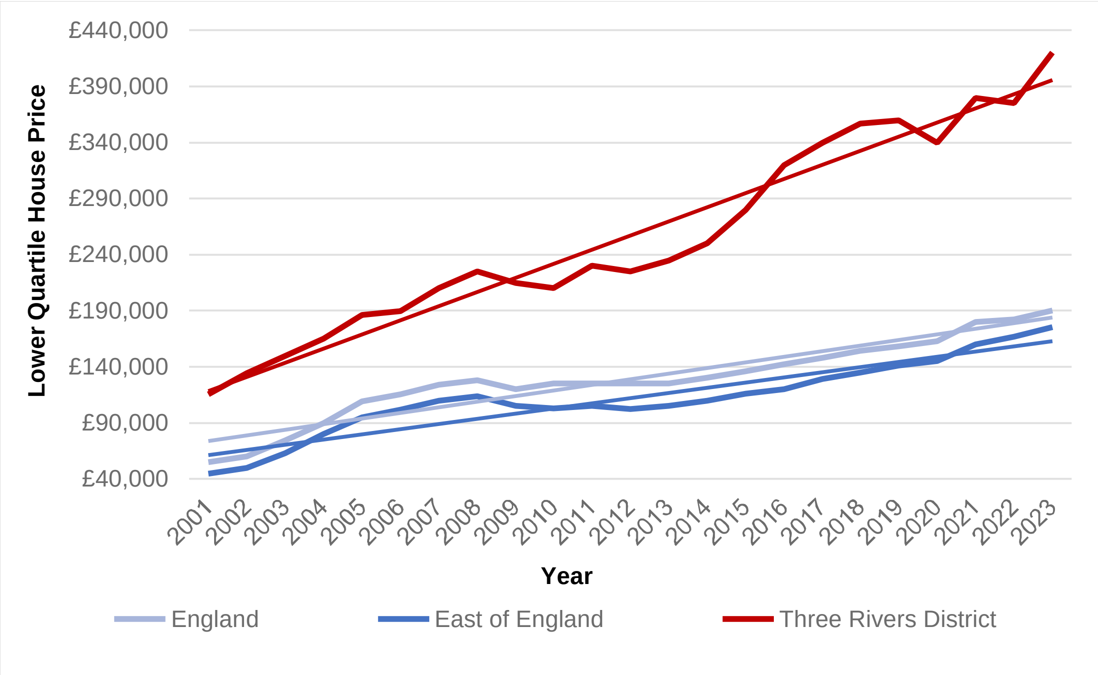



*Source: ONS.*

6.31 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 185% higher than that.

6.32 Figure 6.6 illustrates the lower quartile house sale prices for England, the East of England, and Three Rivers District. It demonstrates that they have increased dramatically between the start of the Core Strategy monitoring period in 2001 and 2023.

*Figure 6.6: Lower Quartile House Prices, 2001 to 2023*




*Source: ONS.*

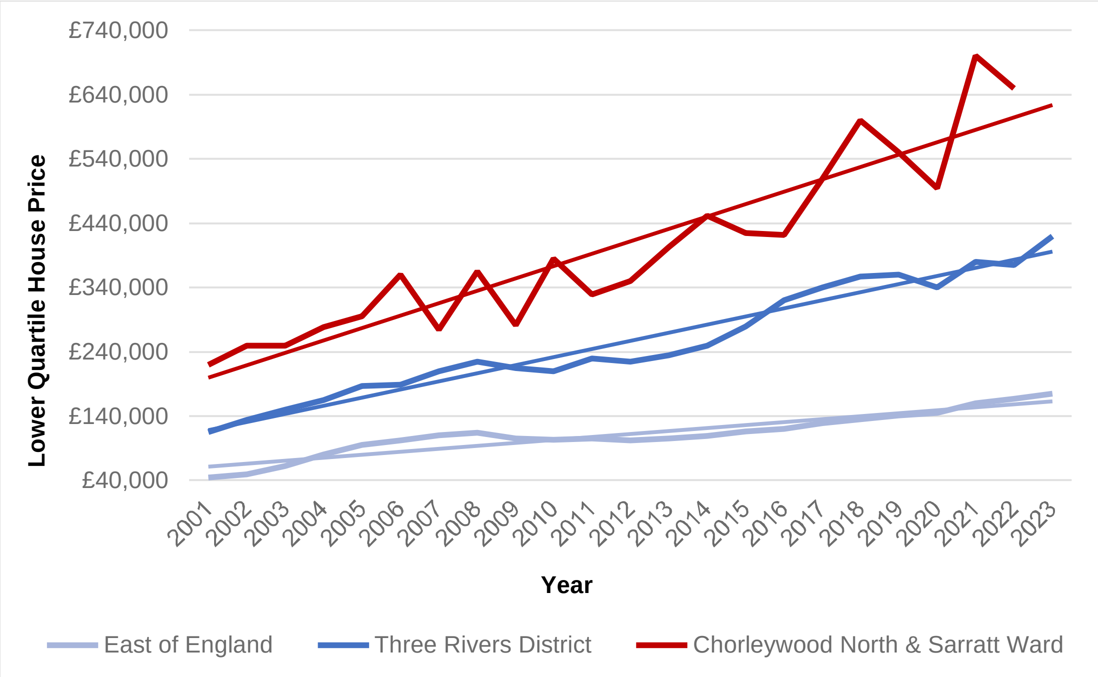
6.33 The lower quartile house price across Three Rivers has risen by 264% from £220,000 in 2001 to £420,000 in 2023. This compares to a 293% increase across the East of England and a national increase of 246% over the same period.

6.34 In 2023 lower quartile house prices in Three Rivers (£420,000) were 140% higher than across the East of England (£175,000) and 121% higher than the national figure (£190,000). <u>It should also be noted that since the start of the 2020 LHNA period lower quartile house prices in Three Rivers have increased by 24%.</u>

6.35 Figure 6.7 below compares the lower quartile house sale prices in the Chorleywood North & Saratt Ward with Three Rivers and the East of England. Once again it demonstrates that they have increased dramatically between the start of the Core Strategy monitoring period in 2001 and 2022[13].

[13] 2023 ONS Lower Quartile data for Wards been discontinued.

*Figure 6.7: Lower Quartile House Price Comparison, 2001 to 2022*




*Source: ONS.*

6.36 The lower quartile house price across Chorleywood North & Saratt Ward has risen by 195% from £220,000 in 2001 to £650,000 in 2022. This figure is 73% higher than the 2022 Three Rivers figure of £375,000, and 289% higher than the 2022 East of England figure of £167,000.

6.37 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal[14] at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (**p.17, [78-79]**) in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

> *"78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. <u>I do not diminish the weight to be provided to this provision because such housing might be even cheaper</u> <u>in a theoretical location elsewhere.</u>*

[14] Ref: APP/Y3940/W/21/3278256

***<u>In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products</u>.***

*79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. <u>I therefore place **substantial positive weight** on the proposed provision of affordable housing in Appeals A and C</u>. <u>The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard</u>"* (my emphasis).

**Summary and Conclusions**

6.38 As demonstrated through the analysis in this section, affordability across Three Rivers has been, and continues to be, in crisis.

6.39 House prices and rent levels in both the median and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Three Rivers out of the reach of more and more people.

6.40 Analysis of market signals is critical in understanding the affordability of housing. It is TKP's opinion that there is an acute housing crisis in Three Rivers, with a lower quartile house price to average income ratio of 12.83.

6.41 Market signals indicate a worsening trend in affordability in Three Rivers and within Chorleywood North & Saratt Ward. By any measure of affordability, this is an authority in the midst of an acute affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

# Conclusions and Recommendations

## Section 7

**Introduction**

7.1 There is a wealth of evidence to demonstrate 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.

7.2 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.

7.3 Market signals indicate a worsening trend in affordability across Three Rivers District and, by any measure of affordability, this is an Authority amid an affordable housing emergency, and urgent action must be taken to deliver more affordable homes.

**Affordable Housing Offer**

7.4 The proposed development includes 50% on site affordable housing provision, which exceeds the requirements of Policy CP4 (45%) of the adopted Core Strategy (2011).

7.5 The proposed tenure split will be 70% Social Rent, 25% First Homes and 5% Shared Ownership which reflects the requirements of Policy CP4 of the Adopted Core Strategy. The proposed affordable housing will be secured by way of a Section 106 planning obligation.

**Local Policy Position**

7.6 Core Strategy Policy CP4 is the main affordable housing policy for Three Rivers District, requiring 45% affordable housing provision on all new developments resulting in a net gain of one or more dwellings.

7.7 As a guide, Policy CP4 seeks 70% of the affordable housing provided to be social rented and 30% to be intermediate, however the Council will treat each case on its merits when assessing the amount, type and tenure mix.

## Affordable Housing Needs

7.8 The South West Hertfordshire Local Housing Needs Assessment (2020) provides the most up-to-date assessment of affordable housing need in Three Rivers District.

7.9 The 2020 LHNA identifies a net need for 512[15] affordable homes per annum over the 2020 to 2036 period, equivalent to a total of 8,192[16] net affordable/social rented dwellings over the 16-year period.

## Affordable Housing Delivery

7.10 Between 2001/02 and 2023/24, a total of 4,989 dwellings were delivered in Three Rivers District, equivalent to 217 per annum. Of these, 1,226 dwellings were affordable tenures, equivalent to 53 per annum. This equates to 25% gross affordable housing delivery.

7.11 When accounting for the Right to Buy, between 2001/02 and 2023/24 the Council has added just 33 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 15% of the total average number of net housing completions.

7.12 Since the start of the 2020 LHNA period in 2020/21, affordable housing completions (net of Right to Buy) have averaged just 42 net affordable dwellings per annum, against a need of 512 net affordable dwellings per annum. A shortfall of 1,879 affordable dwellings has arisen over the four-year period, equivalent to an average annual shortfall of -470 affordable dwellings.

7.13 The Council concedes in its response at Appendix TK1 that according to their records there have been *"no affordable housing completions within Chorleywood North & Saratt Ward between 2000/01 and 2023/24."*

## Affordability

7.14 In addition to the persistent shortfall in affordable housing delivery against objectively assessed needs other indicators further point to an affordability crisis in Three Rivers District. Set out below are the key findings in respect of affordability across the District:

<u>Housing Register</u>

On 31 March 2024 there were 1,310 households on the Housing Register.

[15] 350+162 = 512
[16] 512*16 = 8,192

There was just one affordable dwelling advertised for let in Chorleywood North & Sarratt Ward in the 2023/24 monitoring period. This was a 1-bed affordable dwelling that received 42 bids from households in affordable housing need. No 2-bed, 3-bed or 4+bed affordable homes were advertised for let in the ward in the 2023/24 monitoring period.

Temporary Accommodation

On 31 March 2024, there were 57 households housed in temporary accommodation within the Three Rivers District region. Three Rivers District Council has a responsibility to house these households.

An additional 16 households were housed in temporary accommodation outside the Three Rivers District region at 31 March 2024. Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network.

The number of households in temporary accommodation increased by 20% in the past year, from 61 households in 2023 to 73 households in 2024.

Homelessness

In the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 229 households in need of homelessness prevention duty[17], and a further 66 households in need of relief duty[18] from the Council.

Private Rental Market

Average lower quartile monthly rents in Three Rivers stood at £1,100 per calendar month ("pcm") in 2022/23. This represents a 22% increase from 2013/14 where median private rents stood at £900 pcm.

A lower quartile rent of £1,100 pcm in 2022/23 is 50% higher than the East of England figure of £735 pcm and 76% higher than the national figure of £625 pcm.

[17] The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
[18] The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

Lower Quartile House Prices

The ratio of lower quartile house price to incomes in Three Rivers in 2023 stood at **12.83,** an 84% increase since the start of the Core Strategy monitoring period in 2001 when it stood at 6.98. A ratio of 12.83 in 2023 in Three Rivers stands substantially above the national average of 7.25 (+77%) and significantly above the East of England average of 9.46 (+36%).

The lower quartile house price across Three Rivers has risen by 264% from £220,000 in 2001 to £420,000 in 2023. This compares to a 293% increase across the East of England and a national increase of 246% over the same period.

In 2023 lower quartile house prices in Three Rivers (£420,000) were 140% higher than across the East of England (£175,000) and 121% higher than the national figure (£190,000).

The lower quartile house price across Chorleywood North & Saratt Ward has risen by 195% from £220,000 in 2001 to £650,000 in 2022. This figure is 73% higher than the 2022 Three Rivers figure of £375,000, and 289% higher than the 2022 East of England figure of £167,000.

7.15 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Three Rivers District.

7.16 This demonstrates an acute need for affordable housing in Three Rivers District and one which the Council and decision takers need to do as much as possible to address as required to do so, proactively, by the NPPF (2024).

**Summary and Conclusions**

7.17 There are serious and persistent affordability challenges across Three Rivers District. This is exemplified by the affordability indicators which show a poor and worsening affordability across the Three Rivers District.

7.18 It is the opinion of Tetlow King Planning that there is an acute housing crisis in Three Rivers District, with a lower quartile house price to income ratio of 12.83. Mortgage lending is typically offered based on up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 185% higher than that.

7.19 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.

7.20 The affordable housing benefits of the application scheme are therefore:

Enhanced offer of 50% (up to 300 dwellings) of the scheme provided as affordable housing;

A deliverable scheme which provides much needed affordable homes;

In a sustainable location;

With the affordable homes managed by a Registered Provider;

Which provide better quality affordable homes; and

Greater security of tenure than the private rented sector.

7.21 Evidently, there can be no doubt that the provision of up to 300 affordable dwellings on this site to help those in acute need in Three Rivers District should be afforded **very substantial weight** in the determination of this application.

# Appendix TK1

Freedom of Information Response (13 June 2024)

Colleagues from our Housing department and Planning Policy department have provided the information which has been added to your e-mail below.

Regards

Phil King
Freedom of Information Officer
Ref: 8524-0624

Three Rivers District Council
www.threerivers.gov.uk

From: Lisa Luong <lisa.luong@tetlow-king.co.uk>
Sent: Wednesday, May 29, 2024 5:04 PM
To: FOI (Three Rivers) <foi@ThreeRivers.gov.uk>
Cc: James Stacey <James.Stacey@tetlow-king.co.uk>; Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Subject: Freedom of Information request

Dear Sir / Madam,

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 Chorleywood North & Sarratt Ward, as well as the Three Rivers District 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.

Confirmation of receipt would be greatly appreciated.

**Freedom of Information Request**

Questions 1 to 11 of this request relate to data held by the Housing Department.
Questions 12 to 15 of this request relate to data held by the Planning Department.

**Housing Register**

1. The total number of households on the Council's Housing Register at 31 March 2024.

1,310

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

    a. 1-bed affordable dwelling;
    b. 2-bed affordable dwelling;
    c. 3-bed affordable dwelling; and
    d. A 4+ bed affordable dwelling.

We cannot provide realistic waiting times as we operate a choice based letting system rather than a traditional waiting list. Customers bid on properties of choice in geographical areas of choice. We verify at point of offer so some accounts may also be inactive.

3. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

    a. 1-bed affordable dwelling;
    b. 2-bed affordable dwelling;
    c. 3-bed affordable dwelling; and
    d. A 4+ bed affordable dwelling.

We cannot provide realistic waiting times as we operate a choice based letting system rather than a traditional waiting list. Customers bid on properties of choice in geographical areas of choice. We verify at point of offer so some accounts may also be inactive.

4. The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:

| Location | Household Preferences (31 March 2024) |
|---|---|
| Chorleywood North & Sarratt Ward | |

Customers are not asked to specify their preferred choice of location as part of the application process, so we are unable to provide this information.

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

| Type of affordable property | Chorleywood North & Sarratt Ward | |
|---|---|---|
| | Number of properties advertised | Average Bids per Property |
| 1-bed affordable dwelling | 1 | 42 |
| 2-bed affordable dwelling | 0 | N/A |
| 3-bed affordable dwelling | 0 | N/A |
| 4+ bed affordable dwelling | 0 | N/A |

6. 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

Changes in 2013, 2020 and 2022 – see attached documents.

## Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2024 in the following locations:

| Location | Total Social Housing Stock (31 March 2024) |
|---|---|
| Chorleywood North & Sarratt Ward | 84 properties |

## Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:

| Location | Social Housing Lettings | |
|---|---|---|
| | 1 April 2022 to 31 March 2023 | 1 April 2023 to 31 March 2024 |
| Chorleywood North & Sarratt Ward | 2 | 1 |

## Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Three Rivers District Council on the following dates:

| Households in Temporary Accommodation | 31 March 2023 | 31 March 2024 |
|---|---|---|
| Households Housed within Three Rivers District Council | 51 | 57 |
| Households Housed outside Three Rivers District Council | 10 | 16 |
| Total Households | 61 | 73 |

10. The amount of money spent on temporary accommodation per household within the Three Rivers District Council over the following periods:
    1 April 2023 to 31 March 2024.

No spend as this is all our own temporary accommodation.

11. The amount of money spent on temporary accommodation per household outside the Three Rivers District Council over the following periods:
    1 April 2023 to 31 March 2024.

£173,149 total spend across the year on nightly lets and hotels. We are unable to report the specific costs associated with each household.

## Housing Completions

12. The number of NET housing completions in the Three Rivers District Council broken down on a per annum basis for the period between 2000/01 and 2023/24.

| | 01/02 - 08/09 | 09/10 | 10/11 | 11/12 | 12/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Completions (net) | 1926 | 48 | 107 | 185 | 176 | 142 | 285 | 215 | 144 | 264 | 149 | 406 | 99 | 154 | 204 | 260 |
| Affordable Comps (net) | 498 | 0 | 25 | 55 | 39 | 48 | 93 | 85 | 0 | 90 | 22 | 82 | 91 | 34 | 61 | 3 |

For a breakdown of housing completions per annum for the years prior to 09/10, please view previous Annual Monitoring Report's, available at https://www.threerivers.gov.uk/services/planning/planning-policy/monitoring The AMR for the period 2010/2011 is suggested.

Please note the above relates to financial years.

13. The number of NET affordable housing completions in the Three Rivers District Council broken down on a per annum basis for the period between 2000/01 and 2023/24.

| | 01/02 - 08/09 | 09/10 | 10/11 | 11/12 | 12/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Completions (net) | 1926 | 48 | 107 | 185 | 176 | 142 | 285 | 215 | 144 | 264 | 149 | 406 | 99 | 154 | 204 | 260 |
| Affordable Comps (net) | 498 | 0 | 25 | 55 | 39 | 48 | 93 | 85 | 0 | 90 | 22 | 82 | 91 | 34 | 61 | 3 |

For a breakdown of affordable housing completions per annum for the years prior to 09/10, please view previous Annual Monitoring Report's, available at https://www.threerivers.gov.uk/services/planning/planning-policy/monitoring The AMR for the period 2010/2011 is suggested.

Please note the above relates to financial years.

14. The number of NET housing completions in Chorleywood North & Saratt Ward broken down on a per annum basis for the period between 2000/01 and 2023/24.

2001/2002 = 9
2002/2003 = 9
2003/2004 = 3
2004/2005 = 5
2005/2006 = 26
2006/2007 = 16
2007/2008 = 11
2008/2009 = 11
2009/2010 = -2
2010/2011 = 19
2011/2012 = 5
2012/2013 = 13
2013/2014 = 13
2014/2015 = 0
2015/2016 = 18
2016/2017 = 5
2017/2018 = 6
2018/2019 = 4
2019/2020 = 11
2020/2021 = 9
2021/2022 = 40
2022/2023 = 4
2023/2024 = 13

Please note the above relates to financial years.

15. The number of NET affordable housing completions in Chorleywood North & Saratt Ward broken down on a per annum basis for the period between 2000/01and 2023/24.

According to our records there have been no affordable housing completions within the Chorleywood North & Saratt Ward between 2000/01 and 2023/24.

## 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:<br>a) Affordable housing for rent<br>b) Starter Homes<br>c) Discounted market sales housing; and<br>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.

Kind regards,

**Lisa Luong** **BSc (Hons) MSc**
**Planner**
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[1] As defined by Annex 2 of the National Planning Policy Framework (2023) which can be viewed here.

# Appendix TK2

## Independent News Article (June 2020)

Independent PremiumUK news

**Council housing sell-off continues as government fails to replace most homes sold under Right to Buy**

Home ownership has fallen since the policy was introduced and flats are ending up in the hands of private landlords, writes **Jon Stone**

Sunday 21 June 2020 09:18

Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show.

Housing charities warned that enough "desperately needed" genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock.

Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show.

Under Right to Buy, the government sells off council housing at discounts of up to £100,000 to tenants.

Despite pitching the policy as a way to get more people on the property ladder, overall home ownership has actually fallen significantly since it was introduced in the 1980s.

Previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London.

Councils warned ministers when the policy was updated that the steep discounts meant the money would not be enough to replace homes one-to-one, and that the very existence of the policy undermined their ability to finance housebuilding by making it impossible to reliably borrow against future rents.

The government officially committed to replace the extra homes sold due to an increase in discounts in 2012-13, but housing charities say the affordable sector cannot afford to bleed stock at all. The government is still around 7,000 homes short of its own target, which covers construction up to the third quarter of 2016-17 because councils are given three years to replace the sold stock.

Jon Sparkes, chief executive at homelessness charity Crisis, said: “These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this.

“People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.

“To address this, we need to see the government suspend Right to Buy going forward and prioritisation for social housing being given to people who are homeless so they are able to better access what is currently available. Alongside this, we also need commitment to build significantly more social homes in the coming years to keep in step with demand.

“Ending homelessness in the UK is completely within our grasp, but requires a rethink of existing policies that stand in the way.”

In 2018 Theresa May announced that a long-standing borrowing cap preventing councils from building more homes would be lifting. A survey by the Local Government Association conducted in March 2019 found that a startling 93 per cent of councils were planning to use the extra headroom.

The Scottish and Welsh governments have already ended Right To Buy, citings its effect on the council housing stock.

Commenting on the Right to Buy figures, Polly Neate, chief executive of the housing charity Shelter, said: “The coronavirus pandemic has drummed into us the importance of having a safe home like nothing before. By the same token it’s made it crushingly clear that not enough people do – including the million-plus households stuck on social housing waiting lists. Many of whom are homeless or trapped in grossly overcrowded accommodation right now.

“Despite being desperately needed, our recent track record on building new social homes is atrocious. There was actually a net loss of 17,000 social homes last year, and as it stands Right to Buy isn’t helping. While some people have benefited from the scheme, the failure to replace the properties sold has deprived many others of a genuinely affordable social home.

“But the status quo can be changed. As the government plots its economic recovery from coronavirus, it could give councils the means they need to replace and build social housing. As well as helping to create jobs and get housebuilding going again, this would offer all those without one, their best shot at a safe home.”

Asked about the figures, a spokesperson for the Ministry of Housing, Communities, and Local Government said: “The government is committed to Right to Buy, which has helped nearly two million council tenants realise their dream of home ownership and get on the property ladder.

“Since 2010 we have delivered more homes for social rent – over 140,000 in total – compared to the number of homes sold under the Right to Buy scheme.”

The ministry’s statement is misleading, however, as the 140,000 figure refers to all social housebuilding rather than those homes built to replace housing sold under Right To Buy using receipts earmarked for this purpose.