

**TOWN AND COUNTRY PLANNING ACT 1990 (as amended)
APPEAL BY: Countryside Partnership Ltd and Wattsdown Developments Ltd**

Appeal against the refusal of planning permission by East Hertfordshire District Council under
Section 78 of the Town and Country Planning Act 1990

Land East of the A10, Buntingford, Hertfordshire

PINS REFERENCE: APP/J1915/W/24/3340497

LPA REFERENCE: 3/23/1447/OUT

**PROOF OF EVIDENCE OF ROLAND BOLTON
ON AFFORDABLE HOUSING AND SELF BUILD HOUSING
IN EAST HERTS DISTRICT COUNCIL**



**Strategic Planning Research Unit
DLP Planning Ltd
Sheffield**

JUNE 2024

CONTENTS	PAGE
1.0 EXPERIENCE.....	4
2.0 NATIONAL POLICY.....	6
a) National Planning Policy Framework and Guidance: Affordable Housing.....	6
b) Weight attributed to the provision of affordable housing in Appeals	7
c) National Policy Planning For Self-Build	7
i) 2011 Housing Strategy for England	7
ii) The Housing White Paper: Fixing Our Broken Housing Market (February 2017)....	7
iii) The NPPF	8
d) Weight to be attributed to the provision of self-build in appeals.....	9
3.0 DEVELOPMENT PLAN POLICY FOR AFFORDABLE HOUSING AND SELF BUILD	10
a) The Local Plan 2018: Affordable housing.....	10
b) Buntingford Neighbourhood Plan: Affordable Housing	10
c) The Local Plan 2018: Self Build	10
d) Buntingford Neighbourhood Plan: Self Build	11
4.0 HOUSING MARKET INDICATORS.....	12
b) Dwelling Stock	13
c) Market Signals Data	14
d) Transactions Data.....	18
e) Tenure Profile Data.....	19
f) Private Rent Data	21
g) Conclusion on Housing Market Indicators	23
5.0 AFFORDABLE HOUSING NEED AND DELIVERY.....	24
a) Housing Register Data.....	24
b) Homelessness	24
c) The Councils Assessment of Affordable Housing Need: West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA)2015.....	25
d) The Local Plan.....	25
e) The Councils Assessment of Affordable Housing Need: West Essex and East Hertfordshire Strategic Housing Market Assessment Affordable Housing Update 2017	25
f) The Councils Assessment of Affordable Housing Need: East Hertfordshire District Council: Affordable Housing Needs Assessment Update 2022 Report of Findings May 2022	26

g)	Gross additions to Affordable Housing Stock	27
6.0	THE FUTURE DELIVERY OF AFFORDABLE HOUSING	30
a)	(HERT3) Archers Spring, Land North Of Welwyn Road, Hertford	30
b)	Gilston Area Villages 1 to 6.....	30
c)	Gilston Area Village 7 (3/19/2124/OUT).....	31
d)	Conclusion.....	32
7.0	THE NEED FOR AND DELIVERY OF SELF BUILD	33
a)	The need for Self-Build	33
b)	Conclusion on Need for Self-Build	34
8.0	OVERALL CONCLUSION ON THE NEED FOR AND WEIGHT TO BE ATTRIBUTED TO AFFORDABLE HOUSING AND SELF-BUILD PLOTS.	36

1.0 EXPERIENCE

- 1.1 My name is Roland George Bolton. I have an Honours Degree in Town and Regional Planning and I am a Member of the Royal Town Planning Institute (MRTPI). I am currently a Senior Director of DLP Planning Ltd (DLP) and Head of the Strategic Planning Research Unit (SPRU) which specialises in undertaking bespoke planning research projects, including Objective Assessments of Housing Need and Five-Year Housing Land Supply assessments. DLP Planning Ltd is a national planning consultancy, and I am based in the Sheffield office, working across the whole of England. I have worked in public sector, private practice, and academic roles for over 40 years.
- 1.2 I have a wide range of experience and have held senior positions in both Development Management and development plans in local government. I have also represented Councils at both Public Inquiries and Plan Examinations.
- 1.3 As Senior Lecturer in Town Planning at Sheffield Hallam University I provided training for practicing planning professionals including training for Staff for inquiries and examinations. During this time, I also acted as a consultant to the current DLP/SPRU practice, providing advice to clients in both the public and private sector on a range of issues including the promotion and delivery of housing at various development plan examinations.
- 1.4 I have been a Director of DLP for 27 years, setting up the Sheffield office in 1996. During this time, I have advised clients on a wide range of residential developments from the planned expansions of Northampton, Milton Keynes, Luton and York, through to urban projects like Sheffield University Student Village (3,500 student bed spaces) and Commercial projects such as Midway Park (40-hectare Strategic Employment Allocation at Junction 16 of the M1).
- 1.5 In 2012, I formed the Strategic Planning Research Unit (SPRU) within DLP to bring together the company's expertise to deliver the strategic planning work for a wide range of clients including local authorities, other public sector bodies, landowners, strategic land promoters as well as national, regional and local housebuilders.
- 1.6 I have had considerable experience of giving evidence as an expert witness at Public Inquiries and attending Local Plan Examinations including inquiries and examinations in Hertfordshire.
- 1.7 I attended the East Herts Local Plan Examination (Representor Number 1052305) on Matters 1, 2 (Housing) and 5 (Green Belt).
- 1.8 The scope of this Proof of Evidence is as follows:

- a) Experience
- b) National Policy
- c) Development Plan Policies for Affordable Housing and Self Build
- d) Housing Market Indicators
- e) Affordable Housing Need and Delivery
- f) The need for and delivery of Self-Build Need
- g) Overall Conclusions on the need for and weight to be attributed to affordable housing and Self Build.

1.9 The evidence I have prepared and provided for this appeal (APP/J1915/W/24/3340497) has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

2.0 NATIONAL POLICY.

a) National Planning Policy Framework and Guidance: Affordable Housing

- 2.1 Paragraph 8 of the Framework sets out in paragraph b) the Government's social objective 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. It is noted that paragraph 9 states that these objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework, but they are not criteria against which every decision can or should be judged.
- 2.2 In paragraph 20 of the Framework is states that strategic policies must make sufficient provision for housing including that which is affordable.
- 2.3 Chapter 5 of the Framework covers the delivery of a sufficient supply of homes.
- 2.4 Paragraph 60 states 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 and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 2.5 Paragraph 63 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including, but not limited to, those who require affordable housing and people wishing to commission or build their own homes.
- 2.6 Paragraph 64 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:
- a) *off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
 - b) *the agreed approach contributes to the objective of creating mixed and balanced communities.*
- 2.7 Paragraph 66 requires that decision regarding major development involving the provision of housing is proposed should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.
- 2.8 Paragraph 72 states that local planning authorities should support the development of entry-level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area. These sites should be on land which is not already

allocated for housing and should comprise of entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of the Glossary.

b) Weight attributed to the provision of affordable housing in Appeals

2.9 In respect of the weight that may be applied to the provision of policy compliant levels of affordable housing I note the Inspector in upholding the appeal for 100 units at Oving Road, Chichester on the 18 August 2017 (CD17.24 Appeal Ref: APP/L3815/W/16/3165228 paragraph 63). Concluded that:

“63. Moreover, the provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently I attach substantial weight to this element of the proposal.”

2.10 The need for affordable housing (as per East Herts waiting list) is comparable at just over 2,000 households.

c) National Policy Planning For Self-Build

i) 2011 Housing Strategy for England

2.11 The Strategy (paragraph 64) states that:

*“there are over 100,000 people looking for building plots across the country and we know from recent market research that **one in two people** would consider building their own home if they could.”*

2.12 In paragraph 69 the Strategy states that:

“by making it easier for ordinary people to build their own homes, there is the potential to deliver wider benefits of affordable, greener and innovatively designed homes and to make a significant contribution to the number of new homes built in this country”.

2.13 Paragraph 71 goes on:

“the Government wants to make building your own home a mainstream housing option – an affordable way of building a place people are proud to call home”.

ii) The Housing White Paper: Fixing Our Broken Housing Market (February 2017)

2.14 This White Paper identified the Custom Build housing sector as an important driver to help diversify and fix the broken housing market. In paragraph 3.14 it states that these homes are generally built more quickly and to a higher quality than other homes, and that they tend to use more productive, modern methods of construction. It further states that fewer homes are Custom Build in England than many other countries but that there is evidence of more demand for them.

iii) **The NPPF**

2.15 Self-build and custom-build housing are defined by the Framework¹ as:

“Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act..”

2.16 Paragraph 63 of the Framework states that the size, type, and tenure of housing needed for different groups should be assessed and reflected in planning policies, and this includes those wishing to commission or build their own homes.

2.17 Under section 1 of the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building.

2.18 Section 2(1) of the Self-build and Custom Housebuilding Act 2015 places a duty on relevant bodies to have regard to each self-build and custom housebuilding register, including Part 2 of the register (where a register is in two parts), that relates to their area when carrying out their planning functions².

2.19 Local Authorities can separate their Register into two parts (Part 1 and Part 2) if they introduce a local connection test, with those people who meet the local connection criteria of such a test being placed on Part 1 of the Register. Those who meet all of the statutory eligibility criteria to join the Register except for the local connection test must be entered onto Part 2 of the Register

2.20 In relation to the planning function the PPG states that the duty to have regard to the register is likely to be a material consideration in decisions involving proposals for self and custom housebuilding.

2.21 Section 2A(2) of the Act states:

“(2) An authority to which this section applies must give development permission for the carrying out of self-build and custom housebuilding on enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area in respect of] each base period.”

2.22 The PPG advises that this requires that the relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for

¹ NPPF page 75

² PPG Paragraph: 014 Reference ID: 57-014-20210508

self-build and custom housebuilding in their area. The level of demand being established by reference to the number of entries added to an authority's register during a base period.³

2.23 The first base period runs from 31 October to 30 October each year and at the end of each base period, the relevant authorities have 3 years in which to grant permission for an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period⁴.

2.24 The PPG advises that authorities can have a key role in bringing suitable land forward including engaging with developers and landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding, and facilitating access to those on the register where the landowner is interested⁵.

d) Weight to be attributed to the provision of self-build in appeals

2.25 In the *Corner Mead, Newland Lane*, appeal at Droitwich Spa (Appeal Ref: APP/H1840/W/19/3241879) the Inspector (CD17.29 paragraph 31) concluded that the Council had not granted enough permissions for serviced plots to meet the demand for self-build plots in the first base period and in undertaking the planning balance (CD? paragraph 51) the Inspector while noting there was a 5-year supply nevertheless found the Development Plan out-of-date in respect of self-build housing. The inspector considered that given the importance attached to provision of self-build housing in the NPPF and PPG it should not be treated simply as a component of general market housing. The tilted balance was engaged.

2.26 The Inspector (CD17.29 paragraph 52) also attached substantial weight to the benefit the proposed development would make to the supply of sites for self-build housing including the economic benefit during construction and on-going support for local facilities, as well as significant social benefits in terms of the diversity of housing type which would contribute towards meeting the Council's duty under the 2015 Act.

³ PPG Paragraph: 023 Reference ID: 57-023-201760728

⁴ Ibid

⁵ 025 Reference ID: 57-025-20210508

3.0 DEVELOPMENT PLAN POLICY FOR AFFORDABLE HOUSING AND SELF BUILD

a) The Local Plan 2018: Affordable housing

- 3.1 The 2018 LP paragraph 14.4.3 (CD4.1 page 181) states that there is a significant need for additional affordable housing within East Herts and references the Strategic Housing Market Assessment (SHMA) 2015.
- 3.2 Table 14.1 of the 2018 Local Plan (CD4.1 part 14 Housing Pages 181/2) highlights that the average annual need for affordable housing is 216.8 dpa which at the time represented some 32% of the then housing requirement.
- 3.3 In Paragraph 14.4.8 (CD4.1 part 14 Housing Page 182) the Council states that it secures the majority of affordable housing that in the District via s106 agreements with developers as part of open market housing developments.
- 3.4 The aim of Policy HOU3 (CD4.1 part 14 Housing Page 186) is maximise the delivery of affordable housing using viability assessments to demonstrate that for most developments the targets of 35% to 40% affordable housing required by the policy is achievable without constraining supply.
- 3.5 Policy HOU3 requires 35% affordable housing on sites of 14 or less and 40% or more on site of 15 dwellings and over to be provided on site (CD4.1 part 14 Housing Page 186). These are subject to viability testing and as will be discussed later some of the larger allocations are now likely to deliver considerably lower levels of affordable housing that first envisaged due to viability issues.

b) Buntingford Neighbourhood Plan: Affordable Housing

- 3.6 While the NP (CD4.3 page 40) notes that the Consultation on development policy for the BCA showed that many people felt that development should not take place at all, while at the same time there was support for affordable housing provision, particularly for those who already live in the area.
- 3.7 Policy HD1 of the NP does allow for rural exception sites for affordable housing.

c) The Local Plan 2018: Self Build

- 3.8 While the SHMA did not identify a need for Self-Build the 2018 LP does include a permissive policy to provide Self Build (policy HOU8 CD4.1 part 14 Housing Page 193).
- 3.9 Policy HOU8 seeks to deliver Self build as part of larger site with those sites over 200 dwellings being required to provide 1% of dwelling plots to be for sale to self-builders and secondly through allocations in Neighbourhood plans.

d) Buntingford Neighbourhood Plan: Self Build

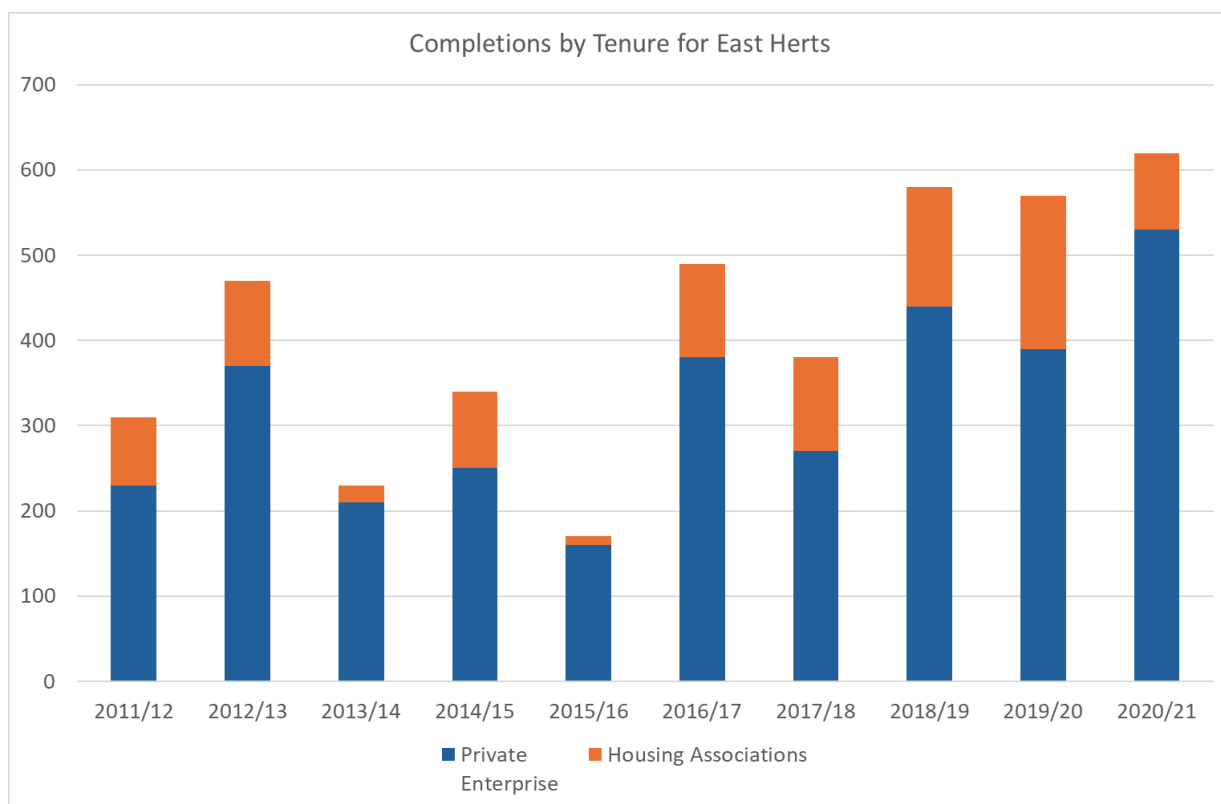
3.10 The NP is silent on the issue of self-build plots.

4.0 HOUSING MARKET INDICATORS

a) Completions Data

4.1 Figure 1 shows the dwelling completions in East Herts District from 2011/2012 to 2022/23 by type as recorded in the government’s live tables 258. The last two years contain imputed figures and have therefore not been included.

Figure 1. East Herts Dwelling Completions by Tenure



Source: Gov.UK Live Table 253

4.2 The data indicates that private enterprise dwellings make up the largest portion of dwellings being completed in East Herts, with housing association dwellings being the second largest portion and local authority delivering no dwellings.

4.3 Overall, for the period 2011/2012 to 2022/23 Social Rented Housing made up some 29% of recorded completions.

b) Dwelling Stock

- 4.4 The table below shows the recorded dwelling stock in East Herts by tenure per year, from 2011 to 2023. Overall, there has been an average increase of 1.1% per year in the dwellings in the dwelling stock in East Herts district from 2011 to 2023 with the total stock rising from 57,607 to 66,452 dwellings.
- 4.5 The stock of housing association units (social rented) has increased at a rate 1.1%, increasing on average by 85 units a year.
- 4.6 Private sector stock increased at the same rate of 1.1% a year.
- 4.7 There has also been an increase in the Local Authority stock from just 5 dwellings to 28 dwellings. There has also been a loss of 20 dwellings from the Other Public sector stock.
- 4.8 The table below includes shared ownership as part of the market additions.
- 4.9 A more detailed commentary on the delivery of all affordable housing is set out in the next section.

Table 1. Total Number of Dwellings by Tenure, East Herts

	Local Authority (incl. owned by other LAs)	Housing association (HA)	Other public sector	Private sector	Market Net additions	HA Net additions	HA % of net additions
2009	5	7,482	50	50,070			
2010	16	7,556	50	50,490	419	85	20%
2011	15	7,515	50	50,766	276	-42	-15%
2012	16	7,639	50	51,024	258	125	48%
2013	16	7,746	50	51,616	592	107	18%
2014	16	7,746	50	51,982	366	0	0%
2015	16	7,837	30	52,455	473	71	15%
2016	16	7,883	30	53,083	628	46	7%
2017	16	7,911	30	53,674	591	28	5%
2018	16	8,000	30	54,048	374	89	24%
2019	16	8,165	30	54,800	752	165	22%
2020	16	8,327	30	55,593	793	162	20%
2021	28	8,409	30	56,304	711	94	13%
2022	28	8,511	30	57,000	696	102	15%
2023	28	8,666	30	57,728	728	155	21%
Total net change	23	1184	-20	7657.6	7,658	1,187	16%
Annual Average Net Change	1.6	84.6	-1.4	547.0	547.0	84.8	
Percentage change since 2011	460%	16%	-40%	15%			

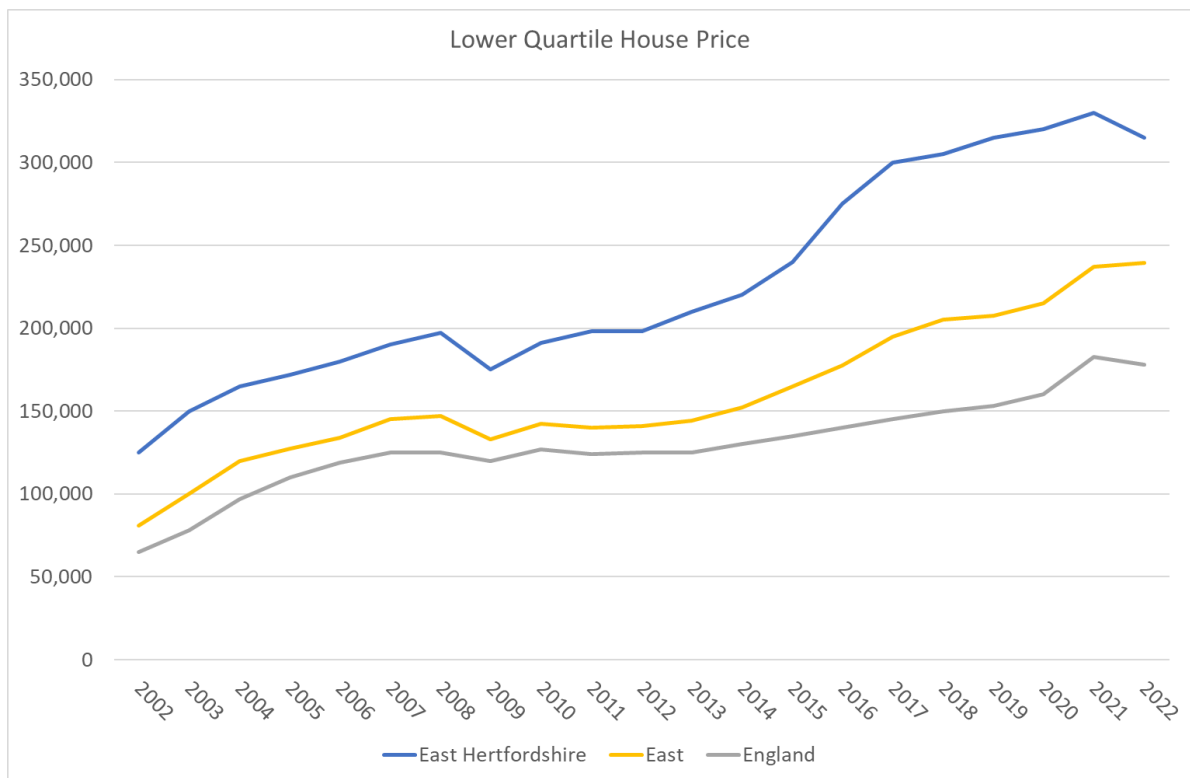
Source: Gov.UK Live Table 100

c) Market Signals Data

4.10 Figure 2 shows the lower quartile house price change and compares the district of East Herts to the regional and national data.

4.11 The lower quartile house prices in East Herts were already higher than the region and England in 2002 and have continued to grow with the lower quartile house price now being over 300,000 for both the district. This is considerably stronger growth than the national level and regional level. The decrease in the lower quartile house price in 2022 reflects the national position but still leaves the lower quartile price significantly higher than both the region and England as a whole.

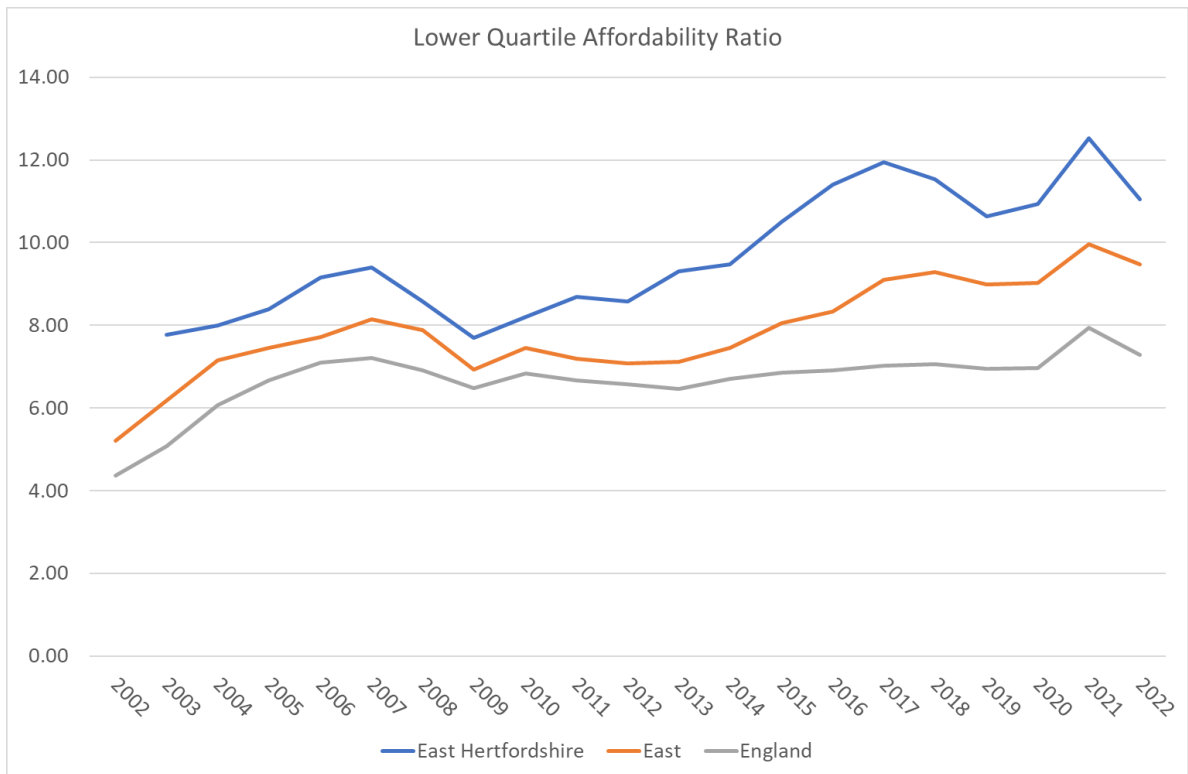
Figure 2. Lower Quartile House Price: East Herts compared to East of England and England



Source: *Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2023, ONS*

4.12 Figure 3 shows the ratio of lower quartile house price to lower quartile gross annual workplace-based earnings and illustrates that the ratio is higher in East Herts than that both the National and Regional levels.

Figure 3. Ratio of lower quartile house price to lower quartile gross annual workplace-based earnings: East Herts compared to East of England and England

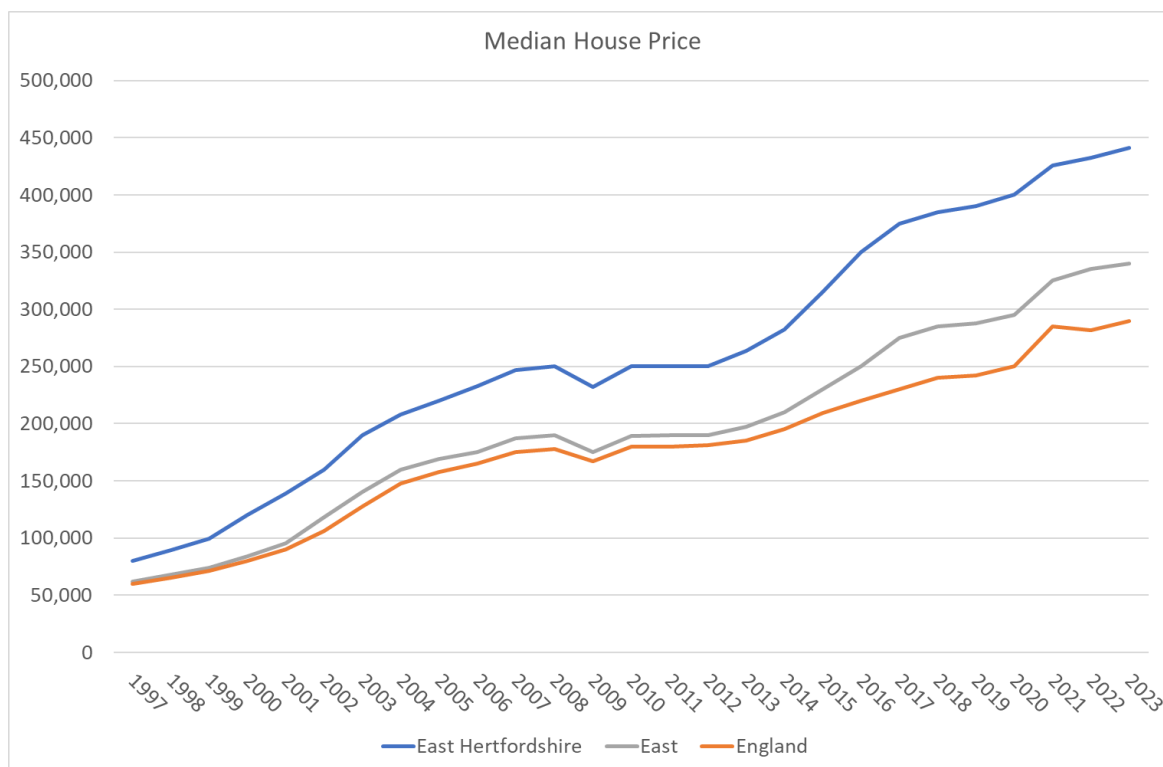


Source: *Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2023, ONS*

4.13 Figure 4 demonstrates the median house price change in East Herts and compares in to regional and national levels.

4.14 This demonstrates that while the median house price in East Herts was higher than the regional and National figure in 1997 this differentiation has increased with prices in East Herts increasing faster than national and regional prices. to that of England, but they saw a higher level of growth in the second half of the decade.

Figure 4. Median House Price: East Herts compared to East of England and England



Source: *Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2023, ONS*

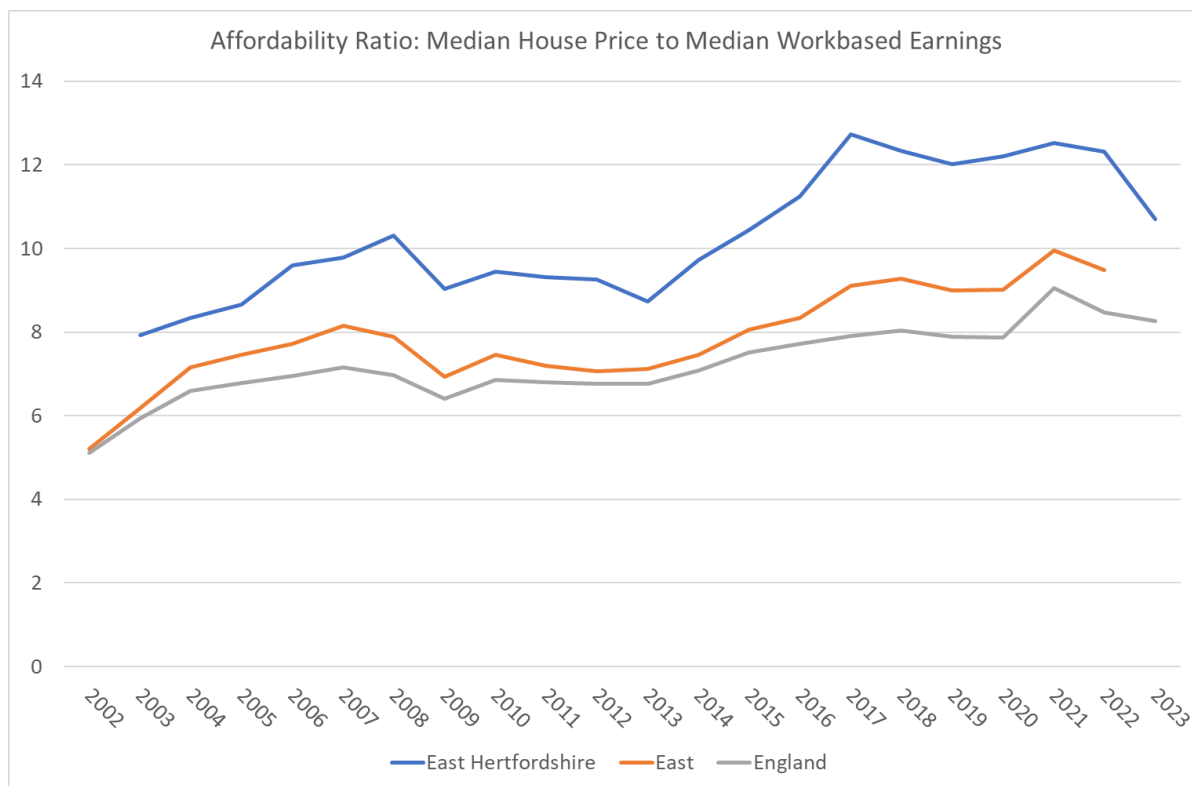
- 4.15 Figure 5 shows the ratio of median house price to median gross annual workplace-based earnings and compares East Herts to Hertfordshire and England and shows that the District ratio is higher than both the national and regional ratios.
- 4.16 The most recent reduction in East Herts ratio still leaves the District considerably less affordable in both the regional and national context. East Herts is ranked 86 out of all the LPAs in England. Its ratio of 10.9⁶ (2023) compares to the regional ratio 9.76⁷ (2022) and the national level 8.26⁸ (2023) in England.

⁶ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2023, ONS Table 5c

⁷ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2023, ONS Table 2c

⁸ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2023, ONS Table 1c

Figure 5. Ratio of median house price to median gross annual workplace-based earnings: East Herts compared to East of England and England



Source: *Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2020, ONS*

- 4.17 In terms of the importance of the lower quartile house price it can assist in considering access to market for households. Mortgage lenders have an absolute limit set by the UK’s Financial Conduct Authority (FCA) on the number of mortgages they’re allowed to issue at more than 4.5 times an individual’s income.
- 4.18 Ratios greater than 4 become progressively unaffordable and again are an indication of undersupply, which is why the Standard Method applies an uplift based upon the degree to which the ratio is above this level.
- 4.19 The median work based earnings of £41,222⁹ would generate a mortgage offer at 4 times earnings plus a 5% deposit would allow for the purchase of a property worth £173,132 this is just 39% of the median price of property £441,000¹⁰ and only 55% of the price of the lower quartile properties at £315,000¹¹.
- 4.20 If one considers actual price paid for property (as recorded by the Land Registry) then in the

⁹ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2020, ONS Table 5c

¹⁰ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2020, ONS Table 5a

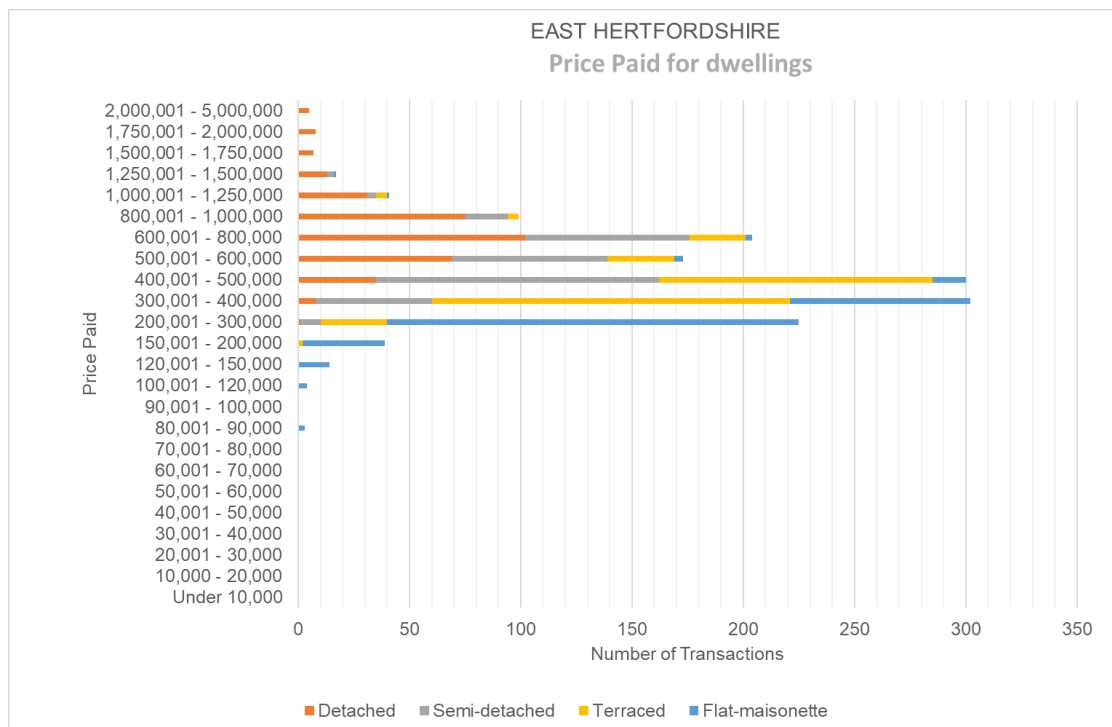
¹¹ Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2020, ONS Table 4a

year 2023 then median work based earnings would have secured a mortgage plus deposit of £173,132 which would have been able to purchase less than 60 (4.2%) of the 1,441 properties that sold in the district in 2023¹². Of these properties all but 2 were flats/studios. This is illustrated by the transaction data below.

d) Transactions Data

- 4.21 Figure 6 shows the price paid for dwellings by type in East Herts in 2023.
- 4.22 The data demonstrates that the most common price range paid for dwellings was £300,001 - £400,000 and was predominantly made up of terraced housing, with a modest proportion of flats and a limited number of semi-detached and detached dwellings.
- 4.23 The highest proportion of detached housing was sold in the £600,001 - £800,000 price paid range.
- 4.24 The prices paid for detached housing had the largest range, with 5 detached dwellings being purchased for in excess of £2,000,000.
- 4.25 On the other end of the spectrum the dwellings that went for the lowest price were flats / maisonettes with 3 properties being sold for between £80,000 and £90,000.

Figure 6. Price Paid, East Hertfordshire 2023



Source: HM Land Registry Price Paid Data, 2024

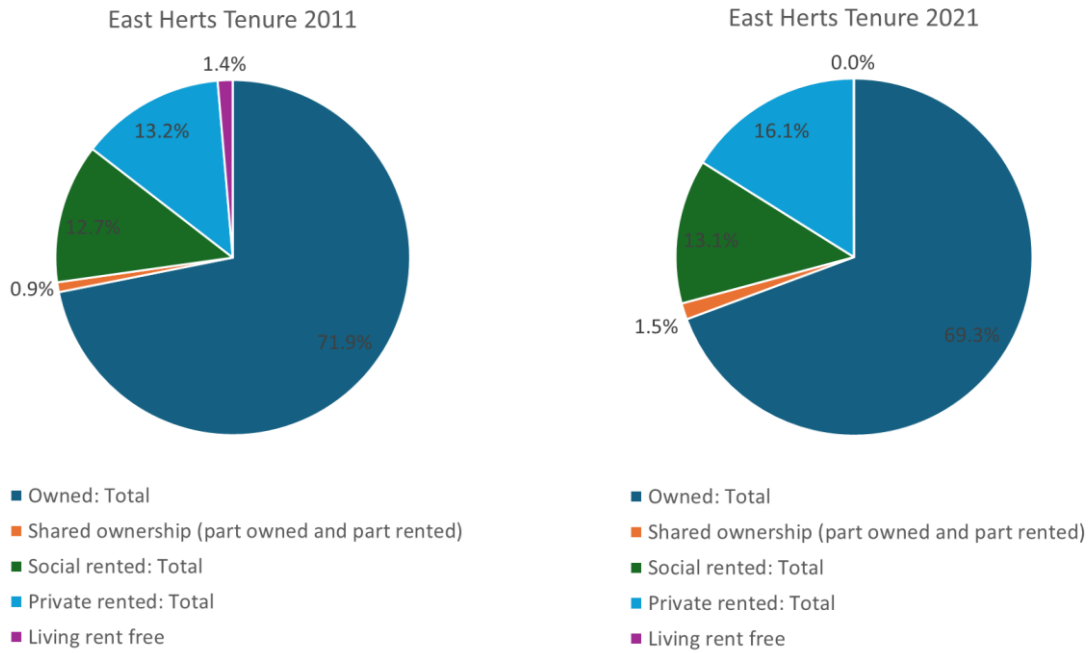
¹² Land Registry Standard Report Price Paid data: Volume of sales by price band East Hertfordshire

e) Tenure Profile Data

- 4.26 Figure 7 shows the how the percentages of people occupying different tenures in 2011 and in 2021 in both East Herts and England¹³.
- 4.27 This data shows that homeownership has declined both locally and nationally although ownership remains higher on both dates in East Herts than in England dropping 71.9% to 69.3% in East Herts compared to a drop from 63.3% to 61.3% in England.
- 4.28 Shared Ownership in East Herts has grown faster than in England rising from 0.9% to 1.5% compared to England rising from 0.8% to 1.0%.
- 4.29 The percentage of Social Rented accommodation has increased in East Herts (from 12.7% to 13.1%) compared to a decrease in this sector nationally from 17.7% to 17.1%.
- 4.30 The largest increase both locally and nationally is in the private rented sector nationally growing from 16.8% to 20.5% and in East Herts for 13.2% to 16.1%. In our analysis of the private rented sector this has implications for the cost of living for households

¹³ Gov.UK Census 2021 and 2011 Tenure all households

Figure 7. Tenure: East Herts and England, 2011 and 2021

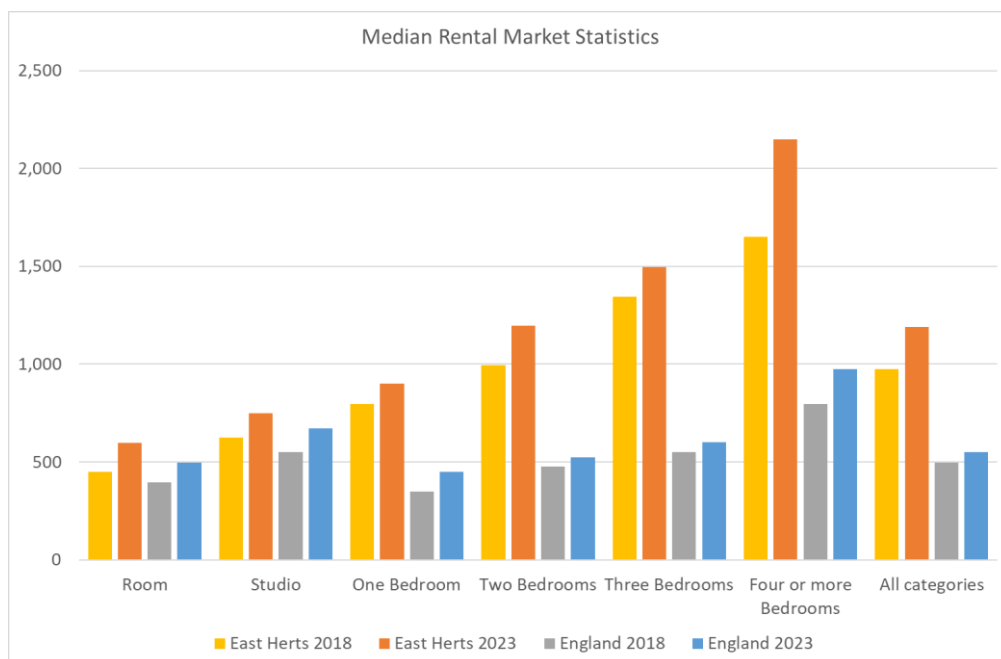


Source: Gov.UK Census 2021 and 2011 *Tenure all households*

f) Private Rent Data

- 4.31 Figure 8 sets out the private rental market statistics for 2018 and 2023¹⁴.
- 4.32 Clearly the cost for renting privately in East Herts is higher than that for England as a whole and it is also notably more expensive to rent dwellings in East Herts (rather than rooms and studios) than in England.
- 4.33 There is an obvious upwards trend in the private rent paid as the dwellings increase in bedroom sizes.
- 4.34 There is also increase between the rental levels in 2018 and 2023. For all categories median rental levels have increased by 11% between 2018 and 2021 in England but by 22% over the same period for East Herts.
- 4.35 In respect of Median rental levels, it is price of rooms and larger dwellings (4 or more bedrooms) that have risen the fastest (by 33% and 30% respectively) although nationally it is the cost of a one bedroomed dwelling that have risen the fastest (29%). Some caution may need to be applied to these rates as some of the larger properties maybe the result of unrelated adults having to house share in order to secure accommodation.

Figure 8. Median Private Rental Market Statistics: East Herts and England

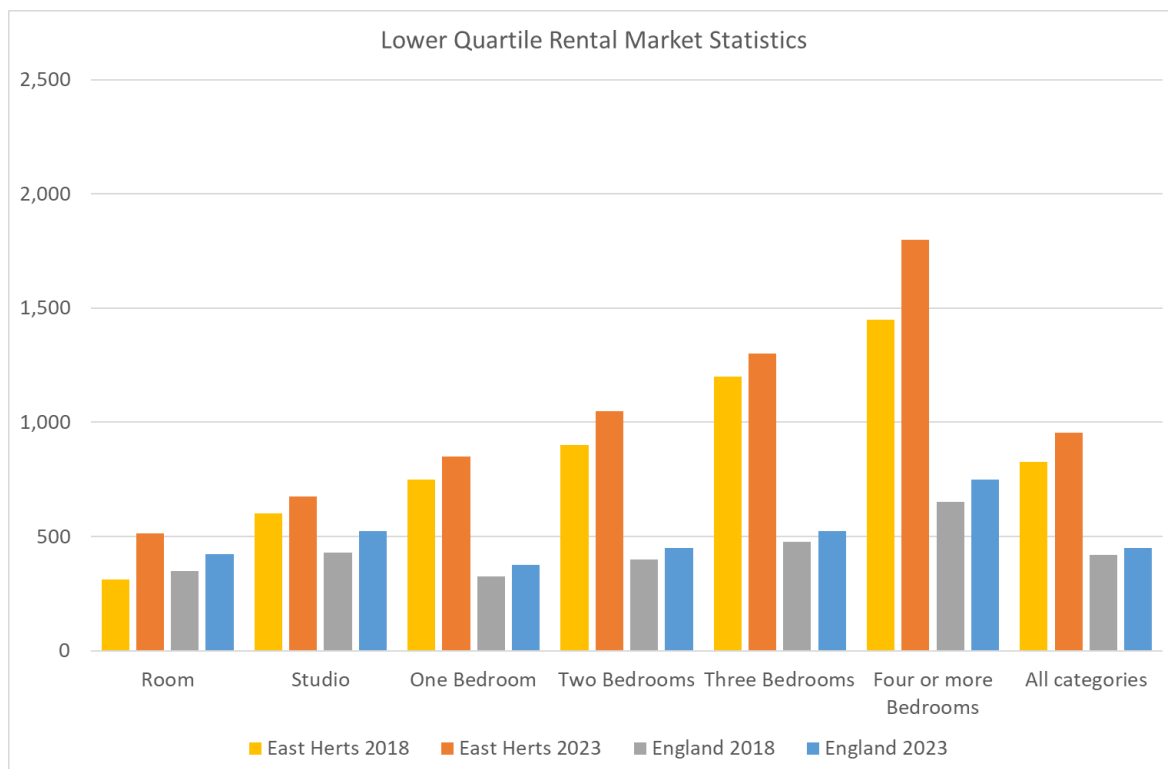


Source: *Private Rental Market Statistics, ONS - 1 September 2022 to 30 September 2023 & 1 September 2018 to 30 September 2019*

¹⁴ Private Rental Market Statistics, ONS - 1 September 2022 to 30 September 2023 & 1 September 2018 to 30 September 2019

- 4.36 For those struggling to find accommodation it is the lower quartile rental figures that are more relevant than the median rental price. The figure below shows the Lower quartile rents for the same period for both East Herts and England and largely this demonstrates a similar pattern with East Herts being more expensive for all types of accommodate over the period. It also shows generally similar patterns of growth to the median rental levels although the increase in the lower quartile cost of rented a room in East Hert has increased by 65% between 2018 and 2023¹⁵.
- 4.37 In my view this is another indication of a tightening housing market as demand is driving price increases in the cheapest form of accommodation.

Table 2. Lower Quartile Private Rental Market Statistics: East Herts and England



Source: *Private Rental Market Statistics, ONS - 1 September 2022 to 30 September 2023 & 1 September 2018 to 30 September 2019*

¹⁵ Private Rental Market Statistics, ONS - 1 September 2022 to 30 September 2023 & 1 September 2018 to 30 September 2019

g) Conclusion on Housing Market Indicators

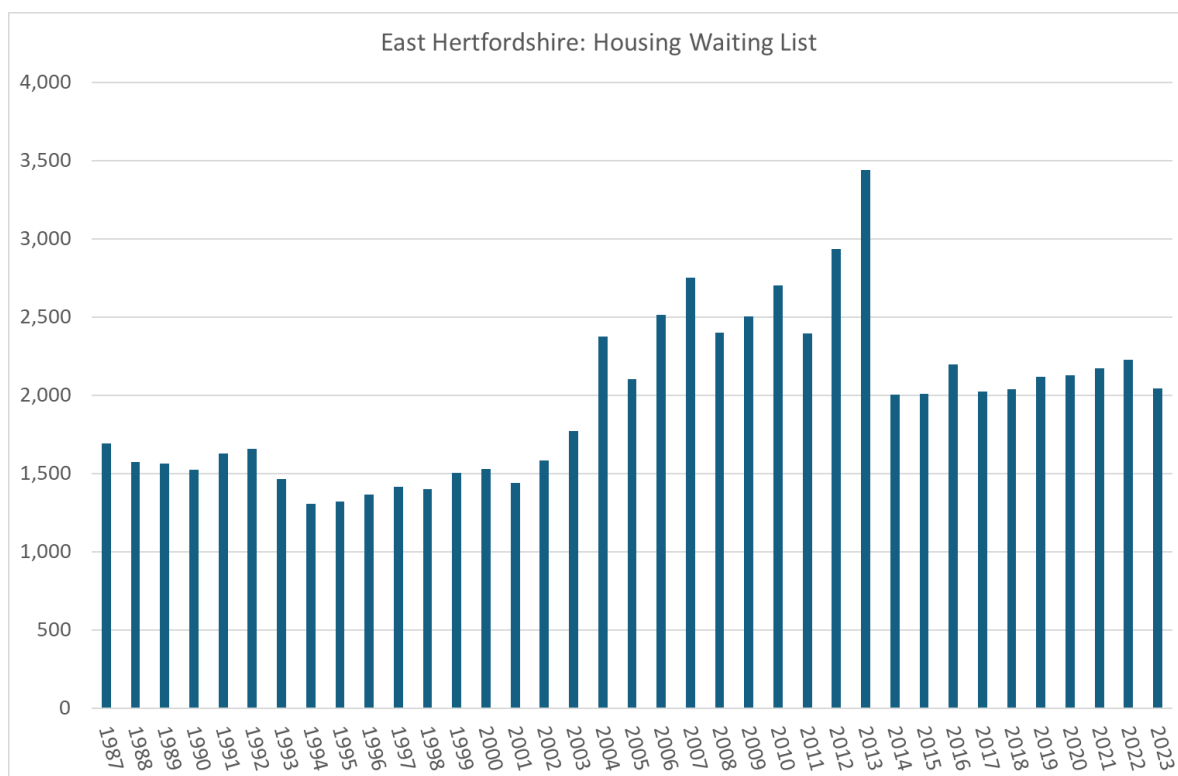
- 4.38 Despite the levels of market and affordable housing that have been delivered since the start of the plan period the indicators of affordability such as house prices and the affordability ratio are all substantially higher than both the Region and England as a whole.
- 4.39 Despite the recent one year fall in the affordability ratio for the district it still remains over 10 there is little chance of new households being able to enter home ownership. Those on median earnings last year would have had a choice of less than 60 properties in their price range all of 2 of which were flats.
- 4.40 The cost of private renting in the district is higher than that for England and is rising more quickly (with a rise in the median cost of all properties at 22% twice that of England as a whole 11% for the period 2018 to 2022).
- 4.41 These are strong indicators that suggest that the housing market in the district is broken

5.0 AFFORDABLE HOUSING NEED AND DELIVERY

a) Housing Register Data

- 5.1 The previous sector highlights that despite the fall in median house price and the affordability ratio in 2022 the housing market in East Herts remains under considerable pressure in terms of affordability and access to all forms and tenures of housing.
- 5.2 Figure 9 demonstrates the number of households on East Herts’ waiting list. The highest number on the register was 3,438 in 2013 but this fell in 2014 to just over 2,000 and has remained at that level for the last 9 years.
- 5.3 It should be noted that changes to how households are recorded on waiting lists means that they are not directly comparable with previous years.

Figure 9. Numbers of households on East Herts housing waiting list



Source: Gov.UK Table LT600

b) Homelessness

- 5.4 As at 31st December 2023 there were 37 household in temporary accommodation 16 of which were households with children. Of these 14 were in bed and breakfast accommodation another 20 were in hostels¹⁶.

¹⁶ DLUHC tables Detailed LA 202312

- 5.5 There are also 127 households which the council owed a prevention or relief duty and 49 households which were threatened with homelessness within 56 days for whom a prevention duty was owed.
- c) The Councils Assessment of Affordable Housing Need: West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA)2015**
- 5.6 The 2015 SHMA Fig 61 (CD17.30 page 78) sets out the need for the whole of the SHMA as being 1,706 dpa and commenting upon this paragraph 4.99 states:
- “Any losses from the current stock (such as demolition or clearance, or sales through Right to Buy) would increase the number of affordable dwellings needed by an equivalent amount.”*
- 5.7 Fig 61 (CD17.30 page 79) sets out the need for East Herts as being a net need of 4,128 affordable dwellings (187.6 dpa).
- d) The Local Plan**
- 5.8 The 2018 LP paragraph 14.4.3 (CD4.1 page 181) states that there is a significant need for additional affordable housing within East Herts and references the Strategic Housing Market Assessment (SHMA) 2015. Table 14.1 (2018 LP page 181) sets out the then current unmet need for affordable housing in the District together with the projected future affordable need for the period 2016-2033.
- 5.9 Table 14.1 of the 2018 Local Plan (CD4.1 Section 14 page 181) highlights that the average annual need for affordable housing is 216.8 dpa which at the time represented some 32% of the then annual housing requirement.
- e) The Councils Assessment of Affordable Housing Need: West Essex and East Hertfordshire Strategic Housing Market Assessment Affordable Housing Update 2017**
- 5.10 This report was considered at the 2018 LP examination (ED111).
- 5.11 Figure 20 (CD17.31 page 32) sets out both the overall housing need and the affordable housing need for the SHMA.
- 5.12 Paragraph 3.54 states in relation to the affordable housing requirement that:
- “Any losses from the current stock (such as demolition or clearance, or sales through Right to Buy) would increase the number of affordable dwellings needed by an equivalent amount.”*
- 5.13 Figure 22 (CD17.31 page 33) sets out the housing mix over the remainder of the Plan period (2016-2033) and suggests that there is a need for some 3,800 affordable dwellings over the 17 year period or 224 dpa.

f) The Councils Assessment of Affordable Housing Need: East Hertfordshire District Council: Affordable Housing Needs Assessment Update 2022 Report of Findings May 2022

- 5.14 Paragraph 4.14 (CD17.32 page 38) of this report states that the model identifies a need for a total of 3,784 affordable dwellings over the period 2021-2033, or 315 per annum.
- 5.15 This paragraph highlights that this increase compared to West Essex and East Hertfordshire Strategic Housing Market Assessment Affordable Housing Update 2017 which showed a need for 224 affordable dwelling per annum was almost entirely due to the period to address the backlog of need being shorter and the introduction of those aspiring to own being considered as potentially being in affordable housing need (i.e. those who may wish to access first homes).
- 5.16 This is an assessment of the net need for affordable housing (CD? paragraph 3.11) as required by the NPPG¹⁷.
- 5.17 Figure 15 (CD17.32 page 21 and paragraph 3.21 page 22) identify a current net need from 1,303 households.
- 5.18 This 2022 assessment of need was in the context of the overall housing need being 12,033 for the or 1,003 dpa (CD17.32 Paragraph 4.7 page 36).
- 5.19 The 2022 SHMA summarises its findings in the paragraph 3.45 (CD17.32 page 26) that there is a need to provide additional affordable housing for 3,034 households over the 12-year period 2021-33 (253 dpa). It goes onto state:
- “These levels would provide for the current unmet needs for affordable housing in addition to the projected future growth in affordable housing need, but **any future losses** from the current stock (such as demolition, or sales through Right to Buy) would increase the number of affordable dwellings needed by an equivalent amount.”*
- 5.20 Paragraph 4.14 and figure 34 (CD17.32 pages 38 and 39) set the overall requirement for affordable housing as being 315 dpa (3,784 dwellings over the period 2021 to 2033).
- 5.21 Figure 35 (CD17.12 page 39) suggests that this would result in a requirement of 31.4% of the total housing requirement being delivered as affordable.
- 5.22 Figure 38 identifies an affordable housing need in Buntingford of some 129 dwellings and a market need of 477 dwellings by 2033.

¹⁷ Paragraph: 008 Reference ID: 67-008-20190722

g) Gross additions to Affordable Housing Stock

- 5.23 The SoCG sets out both the Gross and Net additions to the affordable housing stock.
- 5.24 Table 5 of the SoCG shows that the Council's AMRs have recorded the delivery of 2,279 affordable homes over the plan period to date (2011-2023) and table 6 shows the completions recorded by the Government live tables as being slightly lower at 2,034.
- 5.25 The SoCG goes onto (paragraph 2.25) to identify the difference between the gross completion figures in live table 1011C of 1,380 rented affordable homes and the Net figure of 1,164 and (SoCG paragraph 2.26) explains this as being due to the loss of stock either following sales to sitting tenants (through schemes such as Right to Acquire or preserved Right to Buy) or other disposals or demolitions.
- 5.26 The table below sets out in tabular form the calculations in the SoCG. It takes the net changes to stock for Local Authority and housing association (GOV.UK Live Table 100) and adds to this the gross completions for Shared Ownership and Affordable Homeownership (GOV.UK Live table 1011C).

Table 3. Calculation of net affordable housing delivery

	Local Authority (incl. owned by other LAs) (Net Change)	Housing association (Net Change)	Rented affordable housing	Shared Ownership & Affordable Homeownership (Completions)	Total Affordable
2011/12	1	124	125	27	152
2012/13	0	107	107	29	136
2013/14	0	0	0	34	34
2014/15	0	91	91	17	108
2015/16	0	46	46	31	77
2016/17	0	28	28	49	77
2017/18	0	89	89	24	113
2018/19	0	165	165	126	291
2019/20	0	162	162	76	238
2020/21	12	82	94	129	223
2021/22	0	102	102	34	136
2022/23	0	155	155	78	233
Total for plan period	13	1,151	1164	654	1,818
Average	1.1	95.9	97.0	54.5	151.5

Source: GOV.UK Live Table 100 & Live table 1011C

- 5.27 The SoCG sets out various calculations comparing the net changes as calculated in the above table against the requirements.
- 5.28 The table below sets out what I consider to be the most important comparisons.

Table 4. Affordable housing delivery against SHMA and LP requirements

	Affordable Housing Supply			Affordable Housing Need		
	Rented Affordable Housing (Table 2)	Shared ownership and other Affordable Home Ownership (Table 6)	Total	2015 SHMA	2017 SHMA Affordable Housing Update	2022 AHNA
2011/12	125	27	152	187.6	-	-
2012/13	107	29	136	187.6	-	-
2013/14	0	34	34	187.6	-	-
2014/15	91	17	108	187.6	-	-
2015/16	46	31	77	187.6	-	-
2016/17	28	49	77	187.6	216.8	-
2017/18	89	24	113	187.6	216.8	-
2018/19	165	126	291	187.6	216.8	-
2019/20	162	76	238	187.6	216.8	-
2020/21	94	129	223	187.6	216.8	-
2021/22	102	34	136	187.6	216.8	305.3
2022/23	155	78	233	187.6	216.8	305.3
Total	1,164	654	1,798	2,251	1,518	611
Actual AH delivered in period covered by need assessment				1,818	1,311	369
Total shortfall				433	207	242
Annual shortfall				36	30	121
Shortfall as % of need				19%	14%	40%

* Policy Requirement (LP Table 14.1 page 181)

- 5.29 I consider the important calculation in respect of the 2015 SHMA affordable housing requirement of 187.6 dpa (CD17.30) is the one for the whole of the plan period to date. To just look at the period post adoption ignores the previous level of undersupply which I do not consider to be appropriate given that the annual rate was calculated from the need for the period as a whole.
- 5.30 In respect of the 2015 SHMA there has been an **under delivery of 433 affordable dwellings**.
- 5.31 In terms of the 2017 SHMA and Local Plan Policy I consider the important period to consider is the period from the start of the assessment which is 2016 (CDCD17.31 fig 21 page 33) rather than the period from 2017 as the later ignores the under provision in the first year of the assessment.

- 5.32 In terms of the 2017 SHMA there has been an **under delivery of 207 affordable dwellings** for the period 2016/17 to 2022/23 this uses the start date in the SHMA (CD17.31 fig 21 page 33).
- 5.33 Finally, the most recent assessment of need generates the greatest shortfall over the shortest timescale this is an **under delivery of 261 affordable dwellings** over just two years using the need figure of 315 dpa in the Affordable Housing Needs Assessment (CD17.32 Paragraph 4.14 and figure 34 pages 38 and 39). I note that the Council are suggesting that the need is lower at 305.3 dpa not 315 and while this figure does not occur in the latest Affordable Housing Needs Assessment it closely relates to the 305 dpa in paragraph 3.77 CD17.32 Paragraph 4.14 page 34). This slightly lower need figure reduces the shortfall to 242 dwellings in the last two years and reduces the shortfall down to 40% rather than 42.7%.
- 5.34 The 2018 LP (CD4.1 paragraph 14.4.3 page 181) described the need for affordable housing as “significant” when the requirement was some 216.8 dpa not only has this requirement increase to 315 dpa (a 45%) increase but in the two most recent years the net increase to stock has been only 59% of that requirement.
- 5.35 The situation has not improved since being identified as “significant” in the Local Plan. The level of affordable housing needs has increased by 45%, there has been not reduction in the waiting list (figure 9), and private rental levels are increasing at twice the rate of those for England (22% compared to 11%).
- 5.36 While there is a temptation to regard these shortfalls as modest, but each one is a household which either cannot form or cannot access an affordable home.
- 5.37 These needs I consider to be both critical and immediate as illustrated by the latest assessment of need and the council’s performance against this need.
- 5.38 In considering the delivery of affordable housing this site it pertinent to note that Countryside Partnerships (part of the Vistry Group) engaged to deliver the affordable housing element of the scheme and they have been party to the development of the previous detailed layouts for the site.

6.0 THE FUTURE DELIVERY OF AFFORDABLE HOUSING

6.1 It is noted that the council refer to the proposal as “only” delivering affordable housing in line with policy.

6.2 In my view this does not diminish the weight to be attached to such provision as it provides affordable housing where none would exist otherwise and delivers considerable benefits to each household who occupy them,

6.3 As will become apparent in the Housing Land Supply debate viability can be an issue on some sites. This is particularly the situation were Policy HOU3 requires 40% affordable housing on sites of 15 or more.

a) (HERT3) Archers Spring, Land North Of Welwyn Road, Hertford

6.4 This was subject to an Outline Application for up to 342 residential dwellings (3/19/0790/OUT) this was approved on 19th April 2024, subject to the signing of the section 106 and no decision notice has been issued.

6.5 The committee report of this proposal (CD17.33 paragraph 6.7) reports that instead of delivering the 40% affordable housing that was required this scheme would only deliver 20%. The comments of the EHDC Housing Development Advisor where that:

“6.7 The Housing Development Advisor, following a robust viability scrutiny and number of negotiation meetings with the applicant and taking on a collaborative approach to finding an agreed balance of affordable housing took place. The resultant Affordable Housing offer is at 20% which underwent rigorous independent viability scrutiny. A revised affordable housing on site would deliver a 71:29 split in favour of affordable rent and a mix in favour of approx. 60% family housing typology. This is welcomed by the Housing Officer given the greatest housing need is for affordable rent and for houses, not flatted accommodation.”

6.6 The agreement of 20% affordable housing was not achieved easily and was subject to review by an independent examiner (CD17.33 paragraph 10.8).

6.7 The officers report describes the provision of 20% affordable housing (approximately 68 affordable dwellings) as being a significant public benefit (CD17.33 paragraph 12.6).

b) Gilston Area Villages 1 to 6

6.8 This outline application (3/19/1045/OUT) is for a residential led mixed use development comprising up to 8,500 residential homes in six separate Village Developable Areas.

6.9 This was considered at committee on the 28/03/2023 and approved subject to s106 which has not yet been signed.

6.10 This Committee report (CD17.34 paragraph 5.8) states that in July 2022 the Applicant submitted further amendments to the application in the form of the 2022 July Viability

Appraisal Submission in respect of affordable housing levels proposed and other amendments to application documentation.

- 6.11 Following receipt of representations and detailed consideration of the 2022 Viability Submission, the Applicant submitted amendments to the viability appraisal in December 2022 with consequent amendments made to the Development Specification (CD17.34 paragraph 4.12). The main amendment at this stage was a refinement to the proposed mitigation triggers and S106 obligations, resulting in an increase to the level of affordable housing to a minimum of 23% across the Villages 1-6 development.
- 6.12 It was proposed (CD17.34 paragraph 4.12) that future upwards only viability reassessments will be secured pursuant to the S106 agreement in order to seek to capture an uplift in affordable housing should viability improve.
- 6.13 The application proposes that a minimum of 23% of homes will be affordable dwellings. This equates to 1,955 of the 8,500 homes (CD17.34 paragraph 13.2.13 page 60).

c) Gilston Area Village 7 (3/19/2124/OUT)

- 6.14 The Housing – Final Position Statement (11/11/2022) submitted on behalf of Taylor Wimpey UK Limited confirm the proposals for Affordable Housing provision and related matters as part of the above planning application (CD17.35).
- 6.15 The statement explains (CD17.35 page 1) that since the preparation and submission of the original planning application, there have been a number of events that have resulted in notable changes in the market and are continuing to affect the national (and global) economy. Most significantly for the proposed development, this has resulted in a significant increase in development-related costs associated with construction of new homes together with the expanded infrastructure package required to support the Gilston Area.
- 6.16 The submitted FVA (prepared by CBRE as the Applicant's appointed viability consultants) identifies that the proposed development could support 21.65% (equating to 325 units) affordable housing provision overall as a percentage of the total number of V7 new homes (CD17.35 page 2).
- 6.17 It is further noted that the proposed heads of terms (CD17.35 page 4) are that:
- “1.3 Not to permit more than [90%] of the Market Housing in any Phase to be Occupied unless and until all of the Affordable Housing in that Phase has been Substantially Completed and the Affordable Housing Provider has entered into a nominations agreement.”*

d) Conclusion

- 6.18 In terms of these three developments, it is noticeable that none are proposing to deliver the 40% affordable housing that is the policy target in HOU3.
- 6.19 It is notable that the officers report for (HERT3) Archers Spring, Land North Of Welwyn Road, Hertford a scheme for 342 dwellings describes the provision of 20% affordable housing (approximately 68 affordable dwellings) as being a significant public benefit (CD? paragraph 12.6).

7.0 THE NEED FOR AND DELIVERY OF SELF BUILD

a) The need for Self-Build

7.1 The last AMR (2022/23) suggests that as of 30 October 2023 there were 44 individuals on Part 1 of the Self Build Register and 23 individuals on Part 2 of the Self Build Register. Paragraph 7.3.5 of the AMR (CD17.8) sets out that:

“Alongside maintaining a register of individuals, local authorities are also required to grant permissions to meet the demand on the register within 3 years, however, due to the reliance on site allocations within the District Plan to deliver self-build plots, East Herts hasn’t been able to grant sufficient permissions in this monitoring year”.

7.2 This paragraph in the AMR has been the council’s response since the AMR 2018/19 (CD17.39 paragraph 7.2.21) to the significant under delivery of self-build plots against the timescale in the Statutory Duty

7.3 Table 24 of the AMR (CD17.8) identifies permissions granted for self-build per year. This identifies that there have been no planning permissions granted for self-build plots since 2019-2020 and before that only 7 plots have been delivered in 2018/19.

7.4 The table below sets out the demand for self-build in the District which is increasing year after year with 44 local individuals listed in Part 1 which to quote the AMR 2022-23 (CD17.8 paragraph 7.34) “must be met via the grant of sufficient development permissions for serviced plots of land.”

7.5 The Housing SoCG confirms that there are now 51 applicants on part 1 of the self-build register.

7.6 Part 2 of the register keeps track of general demand for self-build and custom-build, with no requirement to grant sufficient development permissions for serviced plots of land to meet this demand. The general demand has also grown significantly and now stands at a further 23 individuals.

Table 5. The self-build register and permissions granted

Period	Part 1	Part 2	Statutory Duty for demand to be met by:	No of permission granted
1 April 2016 to 30 October 2016			30 October 2019	0
31 October 2016 to 30 October 2017	9	1	30 October 2020	0
31 October 2017 to 30 October 2018	13	4	30 October 2021	0
31 October 2018 to 30 October 2019	18	6	30 October 2022	0
31 October 2019 to 30 October 2020	27	11	30 October 2023	7
31 October 2020 to 30 October 2021	36	19	30 October 2024	0
31 October 2021 to 30 October 2022	40	21	30 October 2025	0
31 October 2022 to 30 October 2023	44	23	30 October 2026	0

Source: EHDC AMR's

- 7.7 In light of the above it is clear that the council on their own evidence have failed to meet their statutory duty with regard to granting sufficient plots to meet the part 1 demand. As referred to above their justification is that the slow delivery of the allocations in the 2018 LP (CD4.1).
- 7.8 The Self-Build Registers held by the council can only provide an indication of the immediate need and furthermore they are reliant upon people knowing about the Self-Build Register and then Registering their interests as such these Register can be a significant under-representation of actual demand.
- 7.9 In the case of East Hertfordshire there are some considerable barriers to registration as they state they may refuse an application unless it is accompanied by a self-build mortgage offer from a verifiable lender and written confirmation from a financial advisor that the applicant has access to sufficient funds to readily purchase land.
- 7.10 The PPG¹⁸ advises that the Registers can be supplemented with the use of existing secondary data sources such as building plot search websites, 'Need-a-Plot' information available from the Self Build Portal and enquiries for building plots from local estate agents.
- 7.11 None the Council's SHMA's have considered the need for Self-Build plots.
- 7.12 In light of the fact that the council have not investigated the longer term need for Self-Build plots the level of past under provision is actually likely to be considerably more than suggested by the current 74 (51 + 23) individuals on the register.
- b) Conclusion on Need for Self-Build**
- 7.13 There has been an undersupply of Self Build plots compared to requirement just 7 compared to a need of 74 (and now 51 on the part 1 register). The need is ten times the level of provision that has been made and is still growing.

¹⁸ NPPG Paragraph: 003 Reference ID: 67-003-20190722

7.14 While the numbers might be modest the ability to address this need where the council have failed in their duty means that substantial weight should be attributed to the proposed supply of self-build plots in this Appeal proposal.

8.0 OVERALL CONCLUSION ON THE NEED FOR AND WEIGHT TO BE ATTRIBUTED TO AFFORDABLE HOUSING AND SELF-BUILD PLOTS.

- 8.1 Despite the recent one year fall in the affordability ratio for the district it still remains over 10 and as such there is little chance of new households being able to enter home ownership. Those on median earnings last year would have had a choice of less than 60 properties in their price range all of 2 of which were flats.
- 8.2 The cost of private renting in the district is higher than that for England and is rising more quickly (with a rise in the median cost of all properties at 22% twice that of England as a whole 11% for the period 2018 to 2022).
- 8.3 These are strong indicators that suggest that the housing market in the district is broken.
- 8.4 The assessments of affordable need are increasing since the 2015 SHMA although as explained this is in part due to the fact that starter homes are now part of the range of affordable dwellings for which the need is required to be calculated. But importantly it is also because the backlog or existing need is not being met and the shortening of the times in which to address this existing need also increases the annual rate.
- 8.5 The scale of the requirement has increased considerably from 216.8 dpa to 315 dpa (a 45% increase or 41% using the lower need of 305.3 dpa as suggested by the council in the SoCG) so while the 2018 LP (CD4.1 paragraph 14.4.3 page 181) described the need for affordable housing as “significant” when the requirement was some 216.8 dpa this significant need has increased significantly.
- 8.6 The council have never delivered affordable housing at the level now required (CD17.32).
- 8.7 The situation has gone beyond the need being “significant” and there is now critical and immediate need for additional affordable housing to be provided.
- 8.8 Despite the levels of market and affordable housing that have been delivered since the start of the plan period the indicators of affordability such as house prices and the affordability ratio all substantially higher than both the Region and England as a whole.
- 8.9 The housing waiting list has remained at over 2000 households for the past 9 years.
- 8.10 The evidence of housing market in the district is under considerable stress and that there is now a critical and immediate need for affordable housing and as such the provision of affordable housing proposed to be delivered in the appeal schemes should be attributed substantial weight in the decision making process.
- 8.11 There has also been a significant undersupply of Self Build plots compared to the number

applicants with only 7 plots being delivered.

8.12 This is against a growing number of applicants on the register and despite the requirements of the council in terms of applicants having to demonstrate financial security to enable delivery of the dwelling at the beginning of the process.

8.13 While the numbers are modest the scale of the undersupply and the growing requirement means that I attach substantial weight should be attributed to the proposed supply of self-build plots in this Appeal proposal.



BEDFORD

Planning / SDD / SPRU

bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU

bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD

nottingham@dlpconsultants.co.uk

LEEDS

Planning

leeds@dlpconsultants.co.uk

LONDON

Planning

london@dlpconsultants.co.uk

MILTON KEYNES

Planning

miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU

sheffield@dlpconsultants.co.uk



RTPI

Chartered Town Planner

