

**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**

**SUMMARY 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**



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## **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). My experience is set out in full on my evidence.

## **2.0 NATIONAL POLICY.**

### **a) National Planning Policy Framework and Guidance: Affordable Housing**

2.1 The Framework (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.

### **b) National Policy Planning For Self-Build**

2.2 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.

2.3 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.

2.4 Section 2(2) of the Self-build and Custom Housebuilding Act 2015 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.”*

## **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 217 dpa.

### **b) The Local Plan 2018: Self Build**

3.3 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).

**c) Buntingford Neighbourhood Plan: Self Build**

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

**4.0 HOUSING MARKET INDICATORS**

- 4.1 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.
- 4.2 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.
- 4.3 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 10.9<sup>1</sup> (2023) compares to the regional ratio 9.76<sup>2</sup> (2022) and the national level 8.26<sup>3</sup> (2023) in England.
- 4.4 In 2023 the 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 2023<sup>4</sup>. All but 2 of these properties were flats/studios.
- 4.5 In respect of tenure 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%.
- 4.6 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.
- 4.7 For those struggling to find accommodation it is the lower quartile rental figures that are more relevant than the median rental price. The lower quartile rents for the period 2018 to 2023 for both East Herts and England highlights East Herts being more expensive for all types of accommodation over the period. It also shows generally similar patterns of growth although the increase in the lower quartile cost of rented a room in East Hert has increased by 65%

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<sup>1</sup> Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2023, ONS Table 5c

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

<sup>3</sup> Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2023, ONS Table 1c

<sup>4</sup> Land Registry Standard Report Price Paid data: Volume of sales by price band East Hertfordshire

between 2018 and 2023<sup>5</sup>.

4.8 In my view this is another indication of a tightening housing market as demand is driving price increases in the cheapest form of accommodation.

4.9 These are strong indicators that suggest that the housing market in the district is broken.

## 5.0 AFFORDABLE HOUSING NEED AND DELIVERY

5.1 There are just over 2,000 households on the housing waiting list in East Herts and it has been at this level for the last 9 years.

5.2 As at 31<sup>st</sup> 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 hostels<sup>6</sup>.

5.3 There are also 127 households which the council owed a prevention of relief duty.

5.4 In respect of the 2015 SHMA there has been an **under delivery of 433 affordable dwellings**.

5.5 Against the 2017 SHMA there has been an **under delivery of 207 affordable dwellings** for the period 2016/17 to 2022/23.

5.6 Against the 2022 SHMA Affordable Housing update there is the greatest shortfall over the shortest timescale which is an **under delivery of 261 affordable dwellings** over just two years.

5.7 The 2018 LP (CD4.1 paragraph 14.4.3 page 181) described the need for affordable housing as “significant” when the requirement was some 217 dpa. Not only has this requirement increased 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.

## 6.0 THE FUTURE DELIVERY OF AFFORDABLE HOUSING

6.1 The council refer to the proposal as “only” delivering affordable housing in line with policy. This does not diminish the weight to be attached to such provision particularly as other larger sites are not delivering this level of affordable housing supply:

- a) (HERT3) Archers Spring, Land North Of Welwyn Road, Hertford 20% affordable housing

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<sup>5</sup> Private Rental Market Statistics, ONS - 1 September 2022 to 30 September 2023 & 1 September 2018 to 30 September 2019

<sup>6</sup> DLUHC tables Detailed LA 202312

- b) Gilston Area Villages 1 to 6 : 23% affordable housing
- c) Gilston Area Village 7 : 21.65% affordable housing

## **7.0 THE NEED FOR AND DELIVERY OF SELF BUILD**

- 7.1 The demand for self-build in the Districts, which is increasing year after year and for the 44 local individuals in Part 1 of the Register the AMR 2022-23 (CD17.8 paragraph 7.34) states that this need “must be met via the grant of sufficient development permissions for serviced plots of land.”
- 7.2 The Housing SoCG confirms that the number on the part 1 register has now risen to 51 applicants.
- 7.3 There has been an undersupply of Self Build plots compared to requirement, just 7 compared to a need of 67 (and now 51 on the part 1 register). The need is almost ten times the level of provision that has been made and is still growing.
- 7.4 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. Meaning 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 scale of the requirement for affordable housing has increased considerably from 217 dpa in the Local Plan to 315 dpa<sup>7</sup> in the Affordable Housing Needs Assessment (a 45% increase) so while the 2018 LP (paragraph 14.4.3 page 181) described the need for affordable housing as “significant” when the requirement was some 217 dpa this significant need has increased significantly.

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<sup>7</sup> CD17.32 Paragraph 4.14

- 8.5 The council have never delivered affordable housing at the level now required.
- 8.6 The situation has gone beyond the need being “significant”, and there is now critical and immediate need for additional affordable housing to be provided.
- 8.7 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.
- 8.8 There has also been a significant undersupply of Self Build plots compared to the number applicants with only 7 plots being delivered.
- 8.9 This is against a growing number of applicants on the register despite the requirements of the council in terms of having to demonstrate financial security to enable delivery at the beginning of the process.
- 8.10 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](mailto:bedford@dlpconsultants.co.uk)

**BRISTOL**

**Planning / SDD / SPRU**

[bristol@dlpconsultants.co.uk](mailto:bristol@dlpconsultants.co.uk)

**EAST MIDLANDS**

**Planning/ SDD**

[nottingham@dlpconsultants.co.uk](mailto:nottingham@dlpconsultants.co.uk)

**LEEDS**

**Planning**

[leeds@dlpconsultants.co.uk](mailto:leeds@dlpconsultants.co.uk)

**LONDON**

**Planning**

[london@dlpconsultants.co.uk](mailto:london@dlpconsultants.co.uk)

**MILTON KEYNES**

**Planning**

[miltonkeynes@dlpconsultants.co.uk](mailto:miltonkeynes@dlpconsultants.co.uk)

**RUGBY**

**Planning**

[rugby.enquiries@dlpconsultants.co.uk](mailto:rugby.enquiries@dlpconsultants.co.uk)

**SHEFFIELD**

**Planning/ SDD / SPRU**

[sheffield@dlpconsultants.co.uk](mailto:sheffield@dlpconsultants.co.uk)



**RTPI**

Chartered Town Planner

