

Summary Affordable Housing Proof of Evidence of Annie Gingell BSc (Hons) MSc MRTPI

Land East of Warwick Road, Drayton, Banbury

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Outline application for up to 170 dwellings (Use Class C3) with associated open space and vehicular access off Warwick Road, Banbury; All matters reserved except for access

Land East of Warwick Road, Drayton, Banbury

Vistry Homes

May 2024

PINS REF: APP/C3105/W/24/3338211

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OUR REF: M23/1212-02.RPT

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Introduction

Section 1

- 1.1 My name is **Annie Gingell** and my credentials as an expert witness are summarised as follows: I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development from Cardiff University (2020).
- 1.2 I am a member of the Royal Town Planning Institute. I have over 9 years' professional experience in the field of town planning and housing. I have previously been employed by a Local Authority in the South West and have been in private practice since 2017. I have been employed at Tetlow King Planning Ltd for the past 7 years.
- 1.3 My credentials as an expert witness are summarised as follows:
- I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development from Cardiff University (2020).
 - I am a chartered member of the Royal Town Planning Institute ("RTPI").
 - I have over 9 years' professional experience in the field of town planning and housing. I have previously been employed by a Local Authority in the South West and have been in private practice since 2017. I have been employed at Tetlow King Planning Ltd for the past 6 years.
 - During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East of England, and London.
 - Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging Development Plan Documents and Supplementary Planning Documents on affordable housing throughout the UK.
- 1.4 My Proof of Evidence examines the affordable housing need in Cherwell and considers the weight to be attributed to affordable housing in the overall planning balance.

- 1.5 As part of my evidence, I have sought data, upon which I rely, from the Council through Freedom of Information (“FOI”) requests which can be viewed at **Appendix AG1** of my main Proof of Evidence.
- 1.6 There is an acute need for more affordable homes to be delivered in Cherwell which the appeal proposals would make a substantial contribution towards addressing.

Affordable Housing Evidence

Section 2

Introduction

- 2.1 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.
- 2.2 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.
- 2.3 Market signals indicate a worsening trend in affordability across Cherwell and by any measure of affordability, this is an authority amid an affordable housing emergency, and one through which urgent action must be taken to deliver more affordable homes
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Affordable Housing Offer

- 2.7 The proposed development is for up to 170 dwellings, of which 40% (up to 68 dwellings) are to be provided on-site as affordable housing.
- 2.8 The proposed tenure split will be 25% (17 units) First Homes, 67% (46 units) Affordable Rented and 8% (5 units) Shared Ownership. The proposed affordable housing will be secured by way of a Section 106 planning obligation.

Local Policy Position

- 2.9 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises the Cherwell Local Plan 2011-2031 Part 1 (2015), and the Cherwell Local Plan 2011-2031 Part 1 Partial Review (2020)
- 2.10 Policy BSC3 of the Cherwell Local Plan 2011-2031 Part 1 (2015) is the primary policy for affordable housing and requires qualifying developments (i.e. 11 or more gross dwellings) to provide 30% on site affordable housing in Banbury.

Affordable Housing Needs

- 2.11 The 2014 SHMA identifies a total net need for 407 new affordable homes each year in Cherwell between 2013 and 2031, equivalent to 7,326 affordable dwellings over the 18-year period. The 2014 SHMA forms part of the evidence base for the adopted Cherwell Local Plan Part 1 (2015).
- 2.12 The 2022 HENA identifies a total net need for 853 new affordable homes per annum within Cherwell between 2022 and 2032, equivalent to 8,530 affordable dwellings over the 10-year period. The 2022 HENA was commissioned by Cherwell District Council and Oxford City Council to inform their individual emerging Local Plans.
- 2.13 Data from DLUHC shows that on 31 March 2023 there were 2,045 households on the Housing Register in Cherwell. 48% of these of households (990) were considered to fall within the 'Reasonable Preference' category.
- 2.14 Based on the dwelling size, successful applicants on the Housing Register in the 2022/23 monitoring period experienced average waiting times ranging from 290 days (approximately 10 months) to 800 days (approximately 2 years and 2 months) for an affordable home in Cherwell.
- 2.15 Over the six-month period between 7 December 2023 and 7 May 2024 there were an average of 69 bids per 1-bed affordable dwelling put up for let across Cherwell, 79 average bids per 2-bed affordable dwelling, 90 average bids per 3-bed affordable dwelling and 49 average bids per 4+ bed affordable dwellings let.
- 2.16 Over the same period, in Banbury there were an average of 67 bids per 1-bed affordable dwelling put up for let in Banbury, 88 average bids per 2-bed affordable dwelling and 116 average bids per 3-bed affordable dwelling. No 4+ bed affordable dwellings were let over the period.
- 2.17 This should be viewed in context of the fact that over the period there were just 69 social housing lettings in Banbury.

- 2.18 DLUHC statutory homelessness data highlights that on 31 March 2023, there were 32 households housed in temporary accommodation by the District. Of these, 21 households (66%) were households.
- 2.19 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 257 households in need of homelessness prevention duty, and a further 162 households in need of relief duty from the Council.
- 2.20 A letter submitted in support of this appeal from Homeless Oxfordshire, the largest provider of supported accommodation for people experiencing homelessness across Oxfordshire, is provided at **Appendix AG6** of this evidence.
- 2.21 In Cherwell in 2022/23, the termination of a private sector tenancy accounted for 141 households owed a prevention duty, or 55% of all households owed a prevention duty; it is the most common reason for the prevention duty.

Affordable Housing Delivery

- 2.22 In the 12-year period since the start of the Local Plan Part 1 period in 2011/12 and 2022/23, net affordable housing delivery in Cherwell has totalled 258 additions to affordable housing stock (net of Right to Buy sales) per annum. This is equivalent to just 25% of net overall housing completions.
- 2.23 When net delivery is compared against affordable housing needs identified in the 2014 SHMA, a cumulative shortfall of -1,279 affordable homes has occurred between 2013/14 and 2022/23. No more than 69% of identified affordable housing needs over the period were met.
- 2.24 Furthermore, when net delivery is compared against the most recent assessment of affordable housing needs in the 2022 HENA, a shortfall of -680 affordable homes has occurred in the first year of the assessment period (2022/23).
- 2.25 In the 12-year period between 2011 and 2022, on an average per annum basis, Cherwell have delivered enough rented affordable housing tenures to meet the needs of just 9% of households on the Housing Register.
- 2.26 Once taking account of likely re-let's to new tenants (estimated to be 288 dwellings per annum in the 2022 HENA) this figure increases to just 25%. Put another way, on an average per annum basis 75% of households on the Housing Register did not have their housing needs met.

Affordability

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

Private Rental Market

- Median private rents in Cherwell stood at £1,000 pcm in 2022/23. This represents a 33% increase from 2013/14 where median private rents stood at £753 pcm.
- A median private rent of £1,000 pcm in 2022/23 is similar to the South East figure of £998 pcm and 21% higher than the national figure of £825 pcm.
- The average lower quartile monthly rent in Cherwell in 2022/23 was £873 pcm. This represents a 34% increase from 2013/14 where average lower quartile monthly rents stood at £650 pcm.
- A lower quartile rent of £873 pcm in 2022/23 is 8% higher than the South East figure of £810 pcm and 40% higher than the national figure of £625 pcm.

Median House Prices

- The ratio of median house prices to median incomes in Cherwell now stands at **9.67**, a 24% increase since the start of the Local Plan Part 1 period in 2011 where it stood at 7.81. A median ratio of 9.67 in Cherwell stands substantially above the national median of 8.26 (+17%).
- The median house price across Cherwell has risen by 69% from £207,250 in 2011 to £350,000 in 2023.
- The median house price across Cropredy, Sibfords and Wroxton Ward has risen by 29% from £327,500 in 2011 to £422,500 in 2023. This figure is 21% higher than the 2023 Cherwell figure of £350,000 and 10% higher than the South East figure of £385,000.

Lower Quartile House Prices

- The ratio of lower quartile house price to incomes in Cherwell stood at **10.77** in 2022, a 32% increase since the start of the Local Plan Part 1 period in 2011 where it stood at 8.13. A lower quartile ratio of 10.77 in Cherwell stands substantially above the national average of 7.37 (+46%).

- The lower quartile house price across Cherwell has risen by 69% from £160,000 in 2011 to £270,000 in 2023.
- The lower quartile house price across Cropredy, Sibfords and Wroxton Ward has risen by 29% from £240,950 in 2011 to £310,000 in 2022. This figure is 19% higher than the Cherwell figure of £260,000, and 17% higher than the South East figure of £265,000.

2.28 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in Cherwell and in Cropredy, Sibfords and Wroxton Ward.

2.29 This demonstrates an acute need for affordable housing in Cherwell and one which the Council and decision takers need to do as much as possible to seek to address as required to do so, proactively, by the NPPF (2023).

Future Supply of Affordable Housing

2.30 It is imperative that the -680 dwelling affordable housing shortfall accumulated in 2022/23, is addressed as soon as possible and in any event within the next five years.

2.31 When the shortfall is factored into the 2022 HENA identified need of 853 affordable homes per annum for the period 2023/24 to 2027/28, the number of affordable homes the Council will need to complete increases by 16% to 989 net affordable homes per annum over the period.

2.32 In respect of the supply of affordable dwellings, on either scenario, the evidence demonstrates that Council is unable to meet its affordable housing needs over the five year period.

2.33 At best, the Council's evidence shows it can deliver 195 gross affordable dwellings per annum over the next five years, which will result in an accumulated shortfall of -3,970 affordable dwellings against the needs set out in the 2022 HENA by the end of the 2027/28 monitoring period.

2.34 At worst, the Appellant's evidence shows that the Council can deliver just 117 gross affordable dwellings per annum over the next five years, which will result in an accumulated shortfall of -4,360 affordable dwellings against the needs set out in the 2022 HENA by the end of 2027/28 monitoring period.

- 2.35 It is important to highlight that there are a number of major development sites included in the 5YHLS that are due to provide no affordable housing due to viability concerns. I also note that none of the sites in the Council's 5YHLS trajectory are providing a level of affordable housing that exceeds Local Plan policy requirements.
- 2.36 Given that the appeal scheme is proposing 40% affordable housing on site, 10% above that required by policy, the scheme presents an opportunity for the Council to significantly boost its supply of affordable housing and recover some of the affordable housing lost due to viability issues elsewhere in the District.

Summary and Conclusions

- 2.37 There are serious and persistent affordability challenges across Cherwell. This is exemplified by the affordability indicators which show a poor and worsening affordability across the District.
- 2.38 It is my opinion that there is an acute housing crisis in Cherwell, with a lower quartile house price to income ratio of 10.77 in 2022. 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 139% higher than that.
- 2.39 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.
- 2.40 My evidence demonstrates 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 Cherwell.
- 2.41 The appeal proposals provide an affordable housing contribution which exceeds requirements of Local Plan policy BSC3 and draft Core Policy 36.
- 2.42 Considering the authority's past poor record of affordable housing delivery and worsening affordability indicators at both the District and local level, it is my view that the provision of up to 68 affordable dwellings on this site should be afforded **substantial weight** in the determination of this appeal.