

St Albans Council
Draft Local Plan Examination
Stage 2 Hearings

Hearing Statement
Matter 4 – Type and Mix of Housing

Ref: ELP/HS2/M4

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Personal Statement and Declaration

I have a BA (Hons) in Geography and an MSc in Urban and Rural Planning and I am a Chartered Member of the Royal Town Planning Institute.

All the information and evidence in this Statement have been prepared by me and are given in accordance with the guidance of the RTPI and I confirm that the views expressed are my genuine professional opinions.

For the sake of transparency, I declare, first, that my wife is a Council Officer and, secondly, that I represent a number of clients with sites in the District, including Moor Mill Tanker Depot, a PDL Green Belt site.

Brian Parker, September 2025



Issue 2 – Affordable Housing and Specialist Housing

Q1 What is the forecast level of affordable housing need arising over the Plan period? Is this set out in the Plan and clear to decision-makers, developers and local communities?

- 1.1 The latest forecast level of affordable housing need over the Plan period is 802 dwellings per annum (dpa), comprising: 449 “affordable rent” dpa and 353 “home ownership” dpa – source ‘South West Herts Local Housing Needs Assessment Update’ (the LHNA Update), Icen Projects, March 2024 (Table 7.53). These figures are not set out in the Plan and, so, is not clear to decision-makers, developers and local communities.
- 1.2 It should be noted that this annual total of 802 is lower than the 828 dpa identified by the original SW Herts LHNA by GL Hearn, September 2020. The previous figure comprised: 443 “affordable rent” dpa and 385 “home ownership” dpa – (Table 37 [page 89] and Table 42 [page 97], respectively).
- 1.3 The reduction in the affordable housing need between 2020 and 2024 is difficult to understand because the LHNA Update explains:

“4.15 Figure 4.5 shows median workplace-based affordability ratios over time. This is the ratio between median house prices and median earnings of those working in SW Herts. In all areas the affordability has worsened between 1997 and 2022 and SW Herts now has a median house price to-income ratio of 14.81, worse than those seen in East of England and England (10.08 and 8.28 respectively). There is limited difference in the affordability ratios between the local authorities, however, St Albans has consistently shown an affordability ratio that is worse than its neighbouring authorities which is currently at 18.44.”

“4.17 These affordability ratios illustrate the difficulty of securing and funding a mortgage in SW Herts for households that don’t already have considerable equity.”

- 1.4 Consequently, it is unclear why the need for affordable housing has reduced if relative affordability has continued to worsen.
- 1.5 **At the Hearing, the Council must explain how and why affordable housing need has fallen since the original LHNA.**

Q2 Will the Plan ensure that affordable housing needs are met? If not, what modifications could be made to ensure that needs are met in full?

- 1.6 The Plan will not ensure that affordable housing needs are met. Instead of meeting the (current) forecast need of c.800 affordable houses per annum, it only seeks to deliver up to c.350 (40% of 885 dpa).

- 1.7 To ensure more of the forecast need is met, Policy HOU2 should be modified to increase the amount of affordable housing sought – i.e. far greater than 40%. Without such an adjustment the Local Plan will not be Positively Prepared.

Q3 What are the thresholds for the provision of affordable homes based on and is Policy HOU2 justified (including in respect of Class C2 accommodation)?

- 1.8 Please refer to my Regulation 19 Submission “Policies SP1 and HOU2 – Housing” and, in particular, Paragraph 4.4 which states, in part:

“45% of the new homes at the Bullens Green Lane scheme (Ref: 5/2020/1992) will be affordable and 100% of the new homes at Addison Park (Ref: 5/2021/3194) will be affordable. In a depressing sign of the Council’s aversion to delivering more than 40% affordable housing, it refused both of these schemes and spent tens of thousands of pounds of taxpayers’ money fighting them, unsuccessfully, at Appeal.”

- 1.9 Paragraph 4.9 of the Draft Local Plan alleges:

“The Council has a priority to provide an appropriate amount of affordable homes. Housing needs and viability research has been undertaken to establish the realistic level at which affordable housing can be delivered as a percentage of private housing in the District.”

- 1.10 The problem with this statement is that it doesn’t prioritise maximising the delivery of affordable housing by establishing the highest level at which it can be provided as a percentage of private housing. Instead, it talks about “an appropriate amount” and a “realistic level”.

- 1.11 The “St Albans District Council: Local Plan Viability Assessment” by BNP Paribas, was published in September 2024, long after the Council had pre-determined that 40% was the right level of affordable homes for St Albans¹. In the first bullet point of Paragraph 1.7 BNP Paribas admits:

“We have appraised residential schemes with a range of affordable housing from 0% to 40% in line with existing policy requirements and to inform emerging Policy.”

¹ In its draft Local Development Framework Core Strategy, July 2009, the Council sought an affordable housing contribution of 35% in line with Policy H2 ‘Affordable Housing’ of the East of England Plan. In October 2010, at a meeting of the Planning Policy Advisory Panel, the Committee charged with drafting a replacement plan, it was arbitrarily raised to 40% without recourse to any affordable housing research or viability review. It has remained 40% ever since.

- 1.12 Ultimately, and unsurprisingly, the Council still considers 40% to be appropriate and realistic, but only because it ticks the boxes the Council created. The question for the Examination is: what level of affordable housing could realistically have been provided if the Council had – as it was required to – looked at reasonable alternatives?
- 1.13 Instead of testing levels of affordable housing contribution until they became unviable, BNP Paribas’ assessment limited itself to an artificial ceiling of 40%. Consequently, a contribution of 41% wasn’t tested. Nor was 45%. Nor the 50% which is now required by Government Policy and which is routinely delivered by major schemes on greenfield Green Belt sites in the District ... unequivocal evidence that 40% is far too low.
- 1.14 **Major residential schemes in St Albans frequently deliver far more than 40% affordable housing. However, the Draft Local Plan’s evidence base did not assess higher alternatives. Consequently, Policy HOU2 is neither Positively Prepared nor Justified.**

Housing for Essential Local Workers (aka Key Workers)

- 1.15 Please see Section 6 of my Regulation 19 submission titled “Policies SP1 and HOU2 – Housing” (October 2024).
- 1.16 Paragraph 4.7 of the Draft Local Plan states (my underlining):
- “National policy sets out that where a need for affordable housing is identified, Plans should specify the type of affordable housing required, and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities.”*
- 1.17 In 2006, a housing study² commissioned by the Council explained (my underlining):
- “A Key Worker is any person who directly provides services that are essential for the balanced and sustainable development of the local community and local economy ...”*
- 1.18 However, for some reason, the Council recoils from the very thought of providing affordable housing for the people we applauded during the Covid Pandemic for putting their lives on the line for us.
- 1.19 In respect of decision-taking, this led to the Council to Refuse a scheme for 330 discounted affordable homes exclusively for essential local workers (Ref: 5/2021/3194 - Allowed on Appeal). In respect of Plan-Making, it led the Council to change the number of houses for Key Workers from its previous Draft Local Plan written before the Pandemic, to the current Draft Local Plan written after it. The number of houses for essential local workers actually dropped ... from just ten, which was shameful, to none, which is despicable.

² St Albans City & District Housing Needs Survey Update, 2006 (DCA)

- 1.20 Whilst the 2020 LHNA did not address the issue of housing for Essential Local Workers, the 2024 LHNA Update did so at 7.128-7.136. At 7.136, the LHNA Update states:

“Improving access to housing can help to address some of these recruitment and retention pressures by addressing issues linked to housing costs and cost of living pressures.”

- 1.21 At the Hearing, the Council must explain why it has chosen not to make any housing provision expressly for Essential Local Workers.

- 1.22 **For the Draft Local Plan to have no housing policies for the essential local workers on whom our local communities rely, is Unsustainable, Unsound and deeply Unfair.**

Brian Parker

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September 2025