

affordable housing needs assessment

An assessment of Affordable Home Ownership housing for Key Workers in St Albans and South West Hertfordshire

November 2021

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Personal Statement

The information and evidence in this Assessment have been prepared and are given in accordance with the guidance of the RTPI and I confirm that the conclusions drawn are my professional opinions.

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1 Summary

- 1.1 This Affordable Housing Assessment establishes a reasonable estimate for the need for Affordable Home Ownership dwellings amongst Key Workers who live or work in or close to St Albans and who provide essential services to its residents.
- 1.2 The Assessment doesn't seek to be an alternative Strategic Housing Market Assessment or Local Housing Need Assessment for either the District or the South West Hertfordshire Joint Strategic Plan Area. Instead, it interrogates published evidence to generate reasonable, cautious estimates of affordable housing need for Key Workers. It does so for:
- the St Albans District;
 - the Districts which are home to the three hospitals in the West Hertfordshire Hospitals HNS Trust; and
 - for the Strategic Housing Market Area/Joint Strategic Plan Area to which the Council belongs.
- 1.3 The Assessment considers various definitions of "essential", "critical" and "key" workers before applying the definition of essential local workers from the NPPF, albeit augmenting this open list with "local government staff".
- 1.4 The Assessment concludes that for the period to be covered by the next Emerging Local Plan, 2020-38, there is a need of between 1,332 and 5,310 Affordable Home Ownership dwellings for Key Workers.

2 The Affordable Housing Context in St Albans

- 2.1 St Albans is one of most expensive places to live in the country. In October 2021, Zoopla calculated the average house price in St Albans to be £596,431¹. In March 2021, the ONS identified the ratio of median house price to workplace-based earnings for England as 7.55 and for the East of England as 9.26². In St Albans it was 15.97³.
- 2.2 In 1994, St Albans District Council (“the Council”), set a policy target of delivering 200 affordable dwellings per annum (“dpa”) ⁴. The text acknowledged that this target “... *probably represents a considerable under-estimation of the total need for affordable housing ...*” and that, subsequent to a District Housing Needs Survey, “... *the affordable housing target may have to be amended*” (1994 Local Plan, para. 3.36). However, as a result of the withdrawal of draft Local Plans in 2017 and 2020, the Council has been unable to amend the policy target of 200 affordable dpa.
- 2.3 The latest Authority Monitoring Report (“AMR”), December 2020, states that between 1994 and 2020, an average of 69⁵ affordable dpa were delivered. This represents a cumulative shortfall of c.3,400 affordable homes.
- 2.4 Whilst the Council aimed to retain the 1994 Plan’s affordable housing contribution of 35%⁶ in its Local Development Framework Core Strategy (July 2009)⁷, it sought to raise it to 40% in subsequent draft Local Plans. The latest of these, Withdrawn in November 2020, sought “*a minimum of 40% affordable homes, as a proportion of the overall dwelling numbers on the site or an equivalent land area, on schemes of 10 (net) or more homes*” (2020 Withdrawn Plan, Draft Policy L3).
- 2.5 The target of 40% appears to be a response to housing becoming more unaffordable. As the draft Local Plan acknowledged: “*more than 75% of all housing need in the District is for Affordable homes ...*” (2020 Withdrawn Plan, Appendix 6).
- 2.6 In September 2020, the South West Hertfordshire Local Housing Needs Assessment (“the LHNA”)⁸, established that the level of unaffordability had increased still further. For St Albans, it identified an annual need for 443 “affordable rent” homes⁹ and 385 “affordable home ownership” dwellings¹⁰ for the period 2020-2036. Together, these two forms of affordable housing equate to 93% of the overall capped housing need of 893 dpa.

¹ [House prices in St.albans stand at £596,431 on average - Zoopla](https://www.zoopla.co.uk/property/price-indices/average-house-price-st-albans/)

² www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/housepriceexistingdwellingstoworkplacebasedearningsratio Table 1c

³ Ibid. Table 5c

⁴ Through Policy 7A “Affordable Housing in Towns and Specified Settlements” and, to a much lesser extent, through Policy 8 “Affordable Housing in the Metropolitan Green Belt”

⁵ St Albans’ Authority Monitoring Report, Historic Table 4, p.135

⁶ Policy 7A “Affordable Housing in Towns and Specified Settlements”

⁷ The 35% contribution was in accordance with the regional target set out in Policy H2 “Affordable Housing” of the East of England Plan (Regional Spatial Strategy), May 2008

- 2.7 Whilst the need for affordable homes continues to rise, the quantity delivered (in actual and relative terms) appears to be falling. The latest AMR confirmed that only 31 affordable homes were delivered in 2019-20, equivalent to just 7% of all new dwellings¹¹. Part of this can be explained by the large numbers of new homes being built under Permitted Development which are exempt from affordable housing contributions. As a consequence, to get closer to its 1994 target, the Council appears to be increasingly reliant on affordable homes being delivered as an element of large housing schemes in the Green Belt approved under “very special circumstances”, such as the 121 being built at Oaklands College¹², the 45 to be built off Bullens Green Lane¹³ in Colney Heath (albeit some of those are likely to be allocated to Welwyn Hatfield District as the Site straddles the administrative boundary), and the (up to) 60 to be built at land off Harpenden Road¹⁴ in the north of St Albans.
- 2.8 Thus, despite the Council’s repeated attempts to deliver higher numbers of affordable homes, the Withdrawal of two Local Plans has contributed to circumstances in which housing is gradually more expensive (in both actual and relative terms), and there is an ever-growing shortfall of affordable housing against an increasingly out-of-date target.

⁸ link: <https://www.stalbans.gov.uk/sites/default/files/attachments/HOU%20August%202020%20-%20South%20West%20Hertfordshire%20Local%20Housing%20Need%20Assessment.pdf>

⁹ p.7 and Table 37 on p.89

¹⁰ p.8 and Table 42 on p.97

¹¹ Ibid. Paragraph 3.21 and Table 6

¹² Ref: 5/2013/2589 (Appeal ref: APP/B1930/W/15/3051164), approved 13th November 2017.

¹³ Ref: 5/2020/1992 (APP/B1930/W/20/3265925), approved 14th June 2021.

¹⁴ Ref: 5/20201/0423, conditionally approved 26th July 2021

3 Approach and Data Sources

3.1 For the purposes of this Assessment, the principle set out in the PPG-recommended 'Housing Needs Assessment at Neighbourhood Plan Level' Toolkit, published by Locality is considered appropriate. This states that: *"... a process that gathers a wide range of relevant data, and then makes balanced, reasonable judgments on the basis of that data, is likely to be on the right lines"*¹⁵.

3.2 The most important relevant data source is considered to be the *"South West Hertfordshire Local Housing Needs Assessment – on behalf of Dacorum, Hertsmere, St Albans, Three Rivers and Watford"*, GL Hearn, September 2020 (henceforth "the LHNA"). For the LHNA, GL Hearn applied the most up-to-date guidance on identifying housing need via the "Standard Method". It is noted that since September 2020, the LHNA has been referenced in the Council's Planning Policy Committee meetings and, more recently, the Local Plan Advisory Group, as the basis for its next Emerging Local Plan, 2020-38.

3.3 In addition, this Assessment has researched and analysed data from a number of other sources, including

- "South West Hertfordshire Strategic Housing Market Assessment, Final Report", GL Hearn, January 2016;
- "Independent Assessment of Housing Needs and Strategic Housing Market Assessment Update: St Albans City and District Council - Final Report", Housing Vision, October 2015;
- "Affordable Housing – Supplementary Planning Guidance", St Albans Council, May 2004;
- St Albans Council's Authority Monitoring Report ("AMR"), December 2020;
- "Key workers: Population and characteristics, 2019" including "Coronavirus and key workers in the UK" and "Key workers reference tables", The Office of National Statistics ("The ONS");
- "Labour Market Profile St Albans", September 2020, The ONS;
- "The NHS workforce in numbers – facts on staffing and shortages in England", February 2021, The Nuffield Trust;
- "NHS Workforce Statistics – December 2020, NHS Digital;

- NHS West Hertfordshire Hospitals NHS Trust website;
- Hertfordshire Constabulary "General Duty Equality Report, 2018-19" March 2019;
- Hertfordshire Heroes website;
- Local Planning Authority websites (Dacorum, Hertsmere, St Albans, Three Rivers and Watford); and
- "Homes for Heroes", Centre for Policy Studies, September 2021

¹⁵ Locality HNA Toolkit, p.7

4 Affordable Home Ownership Need

4.1 To arrive at a reasonable measure of Affordable Home Ownership need for the St Albans District, this section considers: the historic shortfall of affordable homes; the future need for such homes; a reasonable apportion between “affordable rent” and “affordable home ownership”; and house sizes (i.e. numbers of bedrooms).

Historic shortfall – all Affordable Housing

4.2 The Council’s Policy target for affordable housing remains the 200 dpa from the extant 1994 Local Plan. Historic Table 4, p.135, of the Council’s 2020 AMR, records that a total of 1,793 affordable homes have been delivered between 1994-95 and 2019-20. Against the 26-year target of 5,200 dwellings, this represents a shortfall of 3,407 affordable homes. However, as “the affordability adjustment” in the Standard Method “is applied to take account of past under-delivery”¹⁶, this shortfall should have been taken into account in the LHNA and so isn’t included here to avoid the possibility of double-counting.

Future Need - all Affordable Housing

4.3 The LHNA (GL Hearn, September 2020), identifies a net annual need for 828¹⁷ affordable dwellings in St Albans. This is significantly higher than the 617¹⁸ affordable dwellings identified as needed in St Albans between 2013 and 2036, by GL Hearn in its 2016 Strategic Housing Market Assessment for South West Hertfordshire. It is also four times higher than the “current” target of 200 affordable homes per annum.

Future Need of “Affordable Home Ownership” Dwellings

4.4 Table 42 of the LHNA, p.97, identifies a net need for 385 “affordable home ownership” dwellings per annum¹⁹ in St Albans, for the period 2020-2036.

Share of Overall Housing Need

4.5 The 2020 LHNA clearly identifies that the 385 “Affordable Home Ownership” dwellings needed each year, equates to 47% of all affordable houses needed in the District²⁰. Whilst there is no reason to challenge this conclusion, it must be noted that this proportion is greater than the 17% share identified in GL Hearn’s 2016 SHMA²¹ and the 14%²² in the St Albans SHMA by Housing Vision, October 2015. This would appear to suggest that this particular need will continue to rise as local house prices rise. Research uncovered no split between types of affordable housing in the 1994 Local Plan.

Affordable Home Ownership - House Sizes

4.6 The LHNA considers Housing Mix across each of the five Districts in South West Hertfordshire in Section 6. Table 72 “Estimated dwelling requirement by number of bedrooms (2020-36) – Affordable Home Ownership” (Housing Market Model), projects the need for St Albans as follows:

Conclusion on Overall “Affordable Home Ownership” Need in St Albans

4.7 After applying the Standard Method, the LHNA identified a District-wide need of 385 “Affordable Home Ownership” dwellings per annum. Of these homes it appears that 105 should be 1-bedroom, 163 should be 2-bedrooms, 82 should be 3-bedrooms and 35 should be 4 or more bedrooms (figures rounded up to equal 385).

¹⁶ “Can strategic policy-making authorities take account of past under delivery of new homes in preparing plans?” PPG Paragraph 011: Ref: ID 2a-011-20190220

¹⁷ Combined total from Tables 37 and 42, pages 89 and 97, respectively.

¹⁸ Table 41, p. 144

¹⁹ Table 42 on p.97

²⁰ Table 37 on p.89 states 444 “affordable rent” home are needed:53% of all affordable housing

²¹ 102 ‘intermediate homes’ vs 515 ‘social/affordable rent’ homes: Table 43, p.12

²² Independent Assessment of Housing Needs and SHMA, Housing Vision, October 2015, paragraph 4.52

5 Key Workers and their Need for Affordable Home Ownership housing

5.1 This Section explores a variety of sources:

- to establish a reasonable definition of Key Workers;
- to establish a reasonable figure for the number of Key Workers who live or work in or close to the District and who provide essential services to its residents; and
- to arrive at a reasonable estimate of their need for Affordable Home Ownership housing.

What constitutes a “key worker”?

5.2 The National Planning Policy Framework, July 2021, (“the NPPF”), defines “essential local workers” as “public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers” (Glossary, p.67).

5.3 The Government definition for “critical workers” comprises²³:

Health and Social Care including “doctors, nurses, midwives, paramedics, social workers, care workers, and other frontline health and social care staff including volunteers; the support and specialist staff required to maintain the UK’s health and social care sector; those working as part of the health and social care supply chain, including producers and distributors of medicines and medical and personal protective equipment”;

Education and Childcare including “childcare, support and teaching staff, social workers and specialist education professionals who must remain active during the coronavirus (COVID-19) response to deliver this approach”;

Key Public Services, including “those essential to the running of the justice system, religious staff, charities and workers delivering key frontline services, those responsible for the management of the deceased and journalists and broadcasters who are providing public service broadcasting”;

Local and National Government, including “those administrative occupations essential to the effective delivery of: the coronavirus (COVID-19) response, and the delivery of and response to EU transition; and essential public services, such as the payment of benefits and the certification or checking of goods for import and export (including animal products, animals, plants and food), including in government agencies and arm’s length bodies”;

Food and other necessary goods, including “those involved in food: production; processing; distribution; sale and delivery; as well as those essential to the provision of other key goods (for example hygienic and veterinary medicines)”;

Public safety and national security, including “police and support staff, Ministry of Defence civilians, contractor and armed forces personnel (those critical to the delivery of key defence and national security outputs and essential to the response to the coronavirus (COVID-19) outbreak and EU transition), fire and rescue service employees (including support staff), National Crime Agency staff, those maintaining border security, prison and probation staff and other national security roles, including those overseas”;

Transport and border, including “those who will keep the air, water, road and rail passenger and freight transport modes operating during the coronavirus (COVID-19) response and EU transition, including those working on transport systems through which supply chains pass and those constructing or supporting the operation of critical transport and border infrastructure through which supply chains pass”; and

Utilities, communications and financial services, including “staff needed for essential financial services provision (including but not limited to workers in banks, building societies and financial market infrastructure); the oil, gas, electricity and water sectors (including sewerage); information technology and data infrastructure sector and primary industry supplies to continue during the coronavirus (COVID-19) response; key staff working in the civil nuclear, chemicals, telecommunications (including but not limited to network operations, field engineering, call centre staff, IT and data infrastructure, 999 and 111 critical services); postal services and delivery; payments providers; and waste disposal sectors”.

5.4 The Council’s 2004 Affordable Supplementary Planning Guidance defines “key workers”²⁴ as: “people employed or taking up employment (have a confirmed and accepted job offer) in the following employment categories:

- Teachers for Hertfordshire County Council
- Police officers for Hertfordshire Constabulary
- Fire officers for Hertfordshire Fire and Rescue Service
- Health care workers in National Health Service Trusts working in Hertfordshire
- Social care workers for Hertfordshire County Council (residential care workers and social workers dealing with families/children or vulnerable adults)
- Local Authority Staff

²³ [Children of critical workers and vulnerable children who can access schools or educational settings - GOV.UK \(www.gov.uk\)](#) 9th March 2021

²⁴ Paragraph 5.12

- Or such other groups that may be nominated from time to time by the Head of Housing, St Albans District Council.”

Conclusion on “What constitutes a Key Worker?”

5.5 It is reasonable to conclude that there is no precise answer to this question. The Council’s definition of “key workers” is a reasonable one but given the concerns over the validity of an SPG when there is no Development Plan Policy to which it can apply²⁵, it may not be appropriate to rely upon it. And even though the Council signed up to the Armed Forces Covenant a decade ago, there is no evidence that the SPG definition has been changed to incorporate military personnel.

5.6 The Government’s definition of “critical workers” includes private sector workers, too. This appears to be the definition favoured by the Centre for Policy Studies in its report “Homes for Heroes” published 16th September 2021:

“Key workers, who the Government defines as those working in essential sectors in the pandemic such as retail, transport and health, have been at the forefront of Covid, and at greatest risk of infection. We are not just talking here about public sector workers, but also those who distribute food or keep critical services such as electricity going.” (Homes for Heroes, p.5)

5.7 The Centre for Policy Studies states that, according to the ONS, 33% of workers fall into this category (Homes for Heroes, p.17).

5.8 However, as the NPPF, is a material consideration in decision-making and restricts the definition of “key workers” to “public sector workers”, it’s considered to be the most appropriate definition for this Assessment. However, to this open list, it’s considered appropriate to add Local Authority staff who played such an important front-line role in community during the Covid Pandemic. (As it happens, if Military Personnel are added to the Council’s 2004 list the two definitions are virtually the same.)

Key Worker Numbers – in the District and beyond

5.9 St Albans isn’t an island. Many people live in the District but work elsewhere ... and vice versa. For instance: the District is served by the West Hertfordshire NHS Trust with hospitals in St Albans, Hemel Hempstead and Watford; many other public sector services operate across District boundaries (such as Hertfordshire Fire & Rescue); and, because it is part of a wider-than-local Housing Market comprising Dacorum, Hertsmere, St Albans, Three Rivers and Watford, the Council is engaged in the creation of the South West Hertfordshire Joint Strategic Plan to ensure, in part, that they will be in a better position

“to deliver, and better fund essential local transport links, health services and educational facilities that local people want to see”²⁶.

5.10 Taking on board the district-wide situation, the extent of the NHS Trust and the connectivity with the South West Hertfordshire Housing Market Area, this Assessment considers it reasonable to identify the number of Key Workers in three Study Areas:

- the District;
- the three Districts that form the West Hertfordshire NHS Trust (St Albans, Dacorum and Watford); and
- the five Districts in the SW Hertfordshire Strategic Housing Market Area/Joint Strategic Plan Area (the three above, plus Hertsmere and Three Rivers).

5.11 Table 13 of the LHNA (“Forecast Employment Growth 2020-36”, p.38), identifies the number of jobs in St Albans, Dacorum, Watford, Three Rivers and Hertsmere. The ONS “Key Workers, Population and Characteristics, 2019”, identifies the percentage of the workforce in these Districts who qualify as “key workers”²⁷. Table 1 opposite combines these sources to identify a reasonable measure of Key Workers in the three Study Areas.

Study Area	Workforce	Key Worker %	Total Key Workers
St Albans	73,772	29.9	22,058
West Herts HNS Trust Area	207,940	28.8	59,685
South West Hertfordshire	311,554	33.7	105,052

Table 1: Estimate of Key Worker numbers based on size of Workforce and ONS measure of Key Workers by Local Planning Authority

5.12 An alternative measure is to focus on the sectors identified by the NPPF’s definition of essential local workers, supplemented by Local Authority staff (see item 5.8 above).

²⁵ In July 2021, Officers confirmed there is no Development Plan policy for large housing schemes in the Green Belt.
²⁶ From Council’s website description of SW Herts JSP [South West Herts joint strategic plan | St Albans City and District Council](#)

²⁷ ONS “Key workers reference tables”

Study Area	St Albans	West Herts NHS Trust Area	South West Hertfordshire
Teachers ¹	7,000	16,500	24,500
Police ²	437	1,237	1,852
Firefighters ³	63	170	254
NHS, Social and Care Workers ⁴	6,000	20,000	27,000
Local Authority Staff ⁵	400	1398	2,040
Military Personnel ^{6 and 7}	236	668	1,000
Total Key Workers	14,136	39,973	56,646

Table 2: Estimate of Key Worker numbers based on independent sources and ONS measure of Key Workers by Local Planning Authority

Key:

1 – Labour Market Profiles, Nomis/ONS

2 – Pro rata allocation from County-wide figures, source: General Duty Equality Report, 2018-19

3 – Pro rata allocation of County-wide figures, source: Fire and Rescue Workforce and Pensions statistics 2019-20, Home Office

4 – Labour Market Profiles, Nomis/ONS

5 – Sources: individual Local Authority websites

6 – Pro rata allocation from County-wide figures, source: Hertfordshire Heroes website

7 – Whilst the principle established (a) by The Allocation of Housing (Qualification Criteria for Armed Forces) (England)

Regulations 2012 and (b) the recent First Homes policy, means that LPAs shouldn't disqualify serving members

and recent veterans of the Armed Forces from social housing and First Homes, respectively, on the grounds that they

lack a local connection, for the purposes of this Assessment a local estimate has been produced.

5.13 A reasonable measure for the numbers of Key Workers in the three Study Areas, can be seen to range from c.14,000-22,000 in the St Albans District to c.57,000-105,000 in the five Districts that make up South West Hertfordshire. This Assessment applies the lower figures from Table 2. Subsequent studies by others may identify much higher levels of need.

Affordable Home Ownership need amongst Key Workers

5.14 There appears to be no existing data source that sought to establish the need for Affordable Home Ownership amongst Key Workers in St Albans or adjoining districts in South West Hertfordshire. The term “key worker” or “essential worker” isn't mentioned at all in Housing Vision's 2015 SHMA which focussed solely on the St Albans District, or in GL Hearn's 2016 SHMA which covered all five Districts. There are two mentions of “key workers” in GL Hearn's September 2020 LHNA: the first, when the text describes the Government's imminent 'First Homes' policy; and the second, when considering affordable housing to rent.

5.15 Without explicit existing data, it's considered reasonable to extrapolate from broader data in order to estimate the need for Affordable Home Ownership housing in the three Study Areas.

5.16 The starting point is that Affordable Home Ownership options have been designed to assist those in employment who can't afford Open Market Housing, to purchase or part-purchase their own homes through subsidy or discounting. The LHNA established a need for 385 AHO dwellings per annum in the context of a workforce of 73,722. Applying this same ratio to the number of Key Workers identified in Table 2 above, generates the following range of AHO need, per year and across the period of the next Local Plan:

Study Area	Key Workers (NPPF definition + local authority staff)	Affordable Home Ownership need dpa	Affordable Home Ownership need 2020-38
St Albans	14,136	74	1,332
West Herts HNS Trust Area	39,973	208	3,744
South West Hertfordshire	56,646	295	5,310

Table 3: Estimate of Affordable Home Ownership Housing Need for Key Workers (rounded figures)

5.17 Table 72 of the LHNA²⁸, helps establish the annual and Plan-period requirements for house sizes across this range of need (Tables 4 and 5, respectively):

Study Area	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
% required	27%	42%	21%	9%
St Albans	20	31	16	7
West Herts NHS Trust	57	88	44	19
SW Hertfordshire	80	126	62	27

Table 4: Estimated annual AHO need by number of bedrooms per annum (rounded figures)

Study Area	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
St Albans	360	558	288	126
West Herts NHS Trust	1,026	1,584	792	342
SW Hertfordshire	1,440	2,268	1,116	486

Table 5: Estimated AHO need by number of bedrooms 2020-38 (rounded figures)

²⁸ LHNA “Estimated dwelling requirement by number of bedrooms (2020-36) Affordable Home Ownership”, p. 134

6 Conclusion

- 6.1 This Affordable Housing Assessment has established reasonable estimates for the need for Affordable Home Ownership dwellings amongst Key Workers.
- 6.2 The Assessment didn't seek to be a Strategic Housing Market Assessment or Local Housing Need Assessment for either the District or the Housing Market Area/Joint Strategic Plan Area of South West Hertfordshire. Instead, it interrogated published evidence to generate reasonable estimates of affordable housing need for Key Workers. It did so: for the St Albans District; for the Districts which are home to the three hospitals in the West Hertfordshire Hospitals NHS Trust; and for the Strategic Housing Market Area/Joint Strategic Plan Area to which the Council belongs.
- 6.3 The Assessment also considered various definitions of "essential", "critical" and "key" workers. It then applied the definition of essential local workers set out by 2021 NPPF, an open list which has been supplemented in this Assessment by "local authority staff".
- 6.4 The use of alternative definitions, such as the Centre for Policy Studies' definition, or the application of different data sources, such as the ONS measure of Key Workers, is likely to identify higher levels of need than demonstrated here.
- 6.5 This Statement's reasonable conclusion is that for the period to be covered by the next Emerging Local Plan, 2020-38, there is a need of between c.1,330 and 5,300 Affordable Home Ownership dwellings for Key Workers, at the sizes set out below.

Study Area	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms	Total AHO dwellings
St Albans	360	558	288	126	1,332
West Herts NHS Trust	1,026	1,584	792	342	3,744
SW Hertfordshire	1,440	2,268	1,116	486	5,310

Table 6: Estimated Overall AHO need: by Study Area and number of bedrooms 2020-38

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November 2021