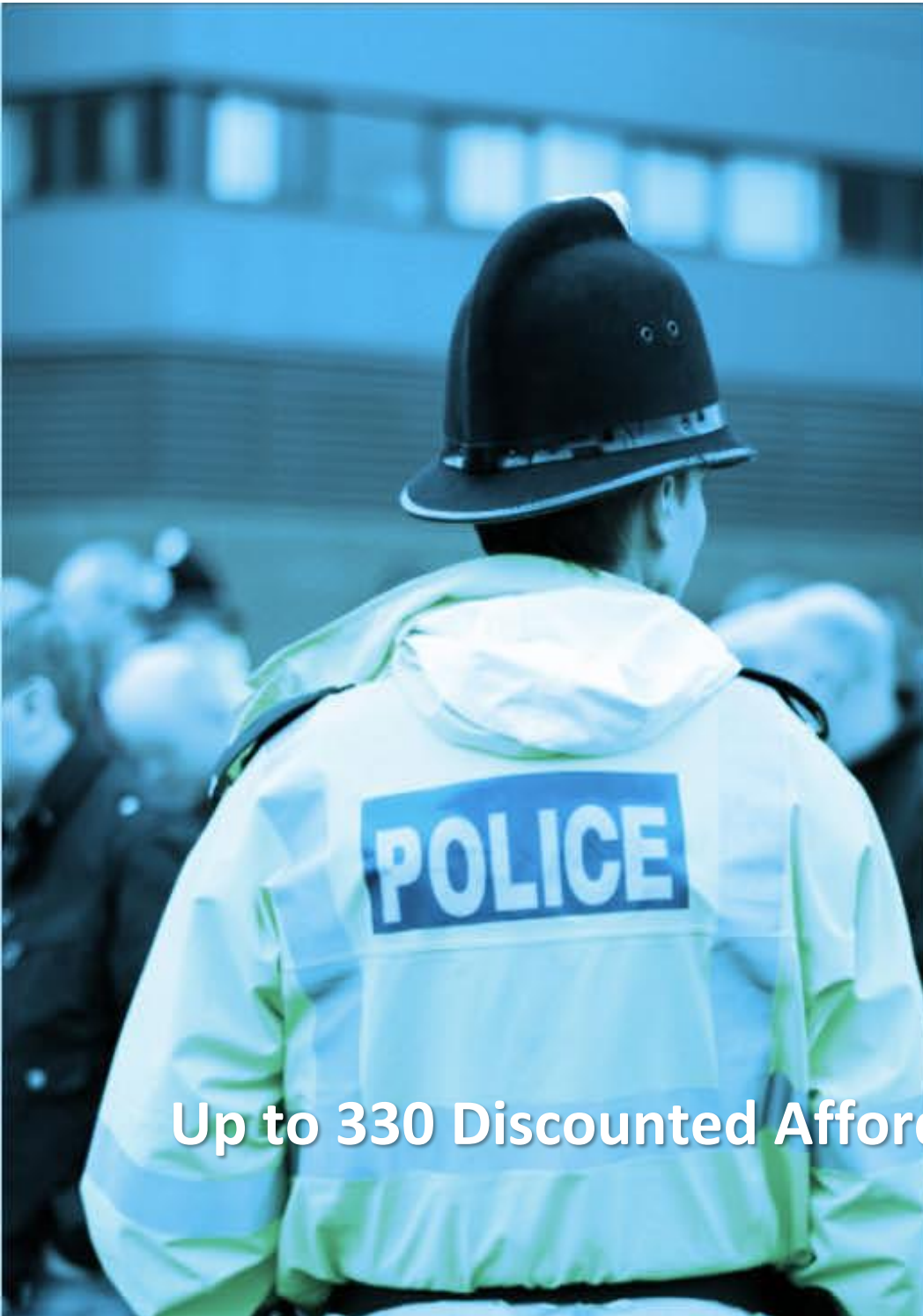


Affordable Housing Statement

Land north of Chiswell Green Lane and west of The Croft, Chiswell Green

ADDISON PARK

local homes for local heroes



Up to 330 Discounted Affordable Homes for Key Workers

Affordable Housing Statement

Land north of Chiswell Green Lane and west of The Croft, Chiswell Green

Outline Planning Application with Access Sought

The demolition of existing buildings, the building of up to 330 discounted affordable homes for Key Workers, including military personnel, the creation of open space and the construction of new accesses.

On behalf of Mr Steve Collins, Headlands Way Limited

Ref: SC/AP/ahs

Brian Parker
BA MSc MRTPI
McPartland Planning Limited



Personal Statement

The information and evidence in this Statement 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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November 2021



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1 Introduction

- 1.1 This Affordable Housing Statement is submitted as part of an Outline Planning Application for up to 330 dwellings at land north of Chiswell Green Lane and west of The Croft in Chiswell Green, St Albans – referred to as Addison Park. It is submitted in accordance with the Council’s Local Requirements as the scheme comprises 15 dwellings or more.
- 1.2 The Statement considers the affordable housing provided by the scheme in the context of national and local policy.
- 1.3 The Indicative Proposed Site Layout, Planning Statement and Design and Access Statement submitted with the application, set out an indicative mix of dwellings which will be subject to discussion with the Council and others prior to the Reserved Matters Application.

2 Planning Policy Context

National policy context

- 2.1 The National Planning Policy Framework, July 2021 (“the NPPF”) sets out the Government’s policy on housing, with affordable housing an essential component.
- 2.2 Paragraph 60 states:
“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, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”
- 2.3 Paragraph 62 states:
“... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies ...”
- 2.4 Paragraph 63 states:
“Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required²⁹ ...”
– footnote 29 references Annex 2 of the Glossary

2.5 Annex 2 of the NPPF states that Affordable Housing is *“housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions ...”*.

2.6 Those definitions include: Starter Homes, Discounted Market Sales Housing and Other affordable routes to home ownership (including shared ownership, relevant equity loans, other low-cost homes for and rent to buy).

2.7 Annex 2 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). Given the important role played by Local Government staff in supporting community safety during the Covid Pandemic, I consider them to be a reasonable addition to this open list.

Local policy context

- 2.8 There is no affordable housing policy for large sites in the Green Belt in the current Development Plan. This was confirmed at a meeting of the Planning Referrals Committee on 26th July 2021, when Officers publicly explained that Policy 8 “Affordable Housing in the Green Belt” is a rural exceptions policy restricted to specific villages and so doesn’t apply to major sites in the Green Belt.
- 2.9 In addition, there is no Local Policy which seeks to rank or prefer one type of affordable housing over another. This is not unusual. I note that in allowing an Appeal for a scheme for 100% affordable housing, Inspector Paul Griffiths rejected the London Borough of Ealing’s objections to the mix of affordable homes being delivered, stating:
“There is no provision in local or national policy or guidance that justifies ranking one form of affordable housing need over another. Indeed, Planning Practice Guidance makes clear that all households whose needs are not met by the market and who are eligible for one or more of the types of affordable housing specified in the Glossary to the Framework are in affordable housing need.”¹
- 2.10 The Council’s 2004 Affordable Housing Supplementary Planning Guidance (“the SPG”) purports to set an affordable housing contribution target of 35% on large sites in the Green Belt, However, I don’t regard this as a material consideration because it effectively seeks, unlawfully I submit, to create policy. That SPGs and SPDs cannot create or amend policy was, I submit, made clear by the High Court in William Davis Ltd & Others vs Charnwood Borough Council [2017] EWHC (3006) Admin. and echoed in the current Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315). If an element of an SPG is unlawful it cannot be a material consideration.

¹ Appeal Decision APP/A5270/W/21/3268157 paragraph 34, October 29, 2021

2.11 The SPG also sets out the Council’s definition of Key Workers: *“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*
- *Or such other groups that may be nominated from time to time by the Head of Housing, St Albans District Council.”*

2.12 However, whilst explicitly identifying Key Workers as a *“different group within the community”* (NPPF, paragraph 62), I can see no evidence of where the size, type and tenure of housing for them has been assessed by the Council, let alone reflected in planning policies.

2.13 Whilst the SPG definition of Key Workers is a reasonable one, the lack of a development plan policy undermines its claim to be a material consideration in decision-making. However, as it and the definition of essential local workers in the NPPF are so similar, there would appear to be no practical difference whichever definition is applied.

3 Affordable Housing Proposal

3.1 In the absence of an applicable affordable housing policy, Addison Park will deliver up to 330 dwellings all of which will be discounted affordable housing.

3.2 It’s proposed that all of the new dwellings will be affordable home ownership houses for Key Workers with a local connection and for serving members or recent veterans of the Armed Forces (the latter qualifying on the principle set out in The Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012). Whether First Homes, Shared Ownership or Discounted market housing – they will each be discounted by a third against the open market value.

3.3 The indicative mix in the Indicative Proposed Site Layout, Planning Statement and Design & Access Statement is just that, indicative. Together, they show that up to 330 dwellings can be provided on the Site along with open space – the Applicant’s preference is to include a Memorial Park – substantial landscaping and tree planting: all in a suitable location for housing close to local services and amenities.

3.4 The scheme seeks to demonstrate that by discounting all of these new homes, high-quality “affordable” affordable housing can be provided for Key Workers who want to get on to the property ladder locally.

3.5 As set out in the Draft S106 Heads of Terms, it is envisaged that the affordable housing will be delivered and managed by a Housing Association, Local Planning Authority or other competent authority or a combination of the above. Precise details to be agreed ahead of the Reserved Matters Application.

4 Conclusion

4.1 In the context of an affordable housing crisis and in the absence of an affordable housing policy in the Green Belt outside the District’s small villages, Addison Park will provide hope to some of the Key Workers to whom we owe so much.

4.2 It will deliver 100% affordable housing. The homes will be Home Ownership products discounted by a third against the market value. They will be reserved exclusively for Key Workers with a local connection or qualifying military personnel. The Site will be managed by one or more Housing Associations, Local Planning Authorities or competent bodies.

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November 2021