

A woman with curly brown hair, wearing a dark blue polo shirt with white stripes on the collar and sleeves, and a purple stethoscope around her neck. She is smiling and looking towards the camera. The background is a blurred hospital setting with blue and white elements.

Why are you being asked
to *refuse* housing for
essential local workers?

Addison Park is a unique scheme which will deliver up to 330 new homes – each one discounted by at least a third and made available exclusively for essential local workers: i.e. NHS staff, social care and childcare workers, teachers, police officers, firefighters, military personnel and Council officers. 25% of the dwellings will be First Homes, the rest will be other Discounted Market Sales Housing or Shared Ownership.

You don't need us to tell you just how difficult it is for dedicated workers in the public sector to find homes they can afford close to where they work, whether that's at St Albans City Hospital, our local schools or the fire station on London Road. You also don't need to be reminded that all the political parties have championed their unwavering support for affordable housing and for Key Workers ... so, why are Officers asking you to refuse this unique scheme?

Because Officers don't think they're needed ...

On 1st March 2022, the Local Plan Advisory Group was told that no Housing Needs Survey commissioned by the Council had ever attempted to measure the need for Key Workers/essential local workers.

That sobering fact might explain why, in the most recently withdrawn Local Plan, Policy S6 proposed building up to 12,345 new homes in the Green Belt but allocating just 10 of them to Key Workers.

In its consideration of our Application, Officers have relied upon the Local Housing Needs Assessment published by GL Hearn in September 2020 which covers the 5 districts of South West Hertfordshire. It, too, made no attempt to measure the need for essential local workers, even though they are the only group explicitly mentioned in the NPPF's definition of Affordable Housing.

Consequently, the submissions from both Spatial Planning and Strategic Housing opposed the delivery of Key Worker Housing because their need wasn't identified in the LHNA. Instead, Officers demanded we deliver Affordable Rent housing with no allocation for Key Workers, because of what is said in the LHNA.

Clearly, the Council cannot simultaneously say "we don't know what the need for Key Worker Housing is" and "there is no need for Key Worker Housing". Common sense tells us there is a need ... but the Council has admitted it has never measured it. Which is why we did.

McPartland Planning Limited produced "An Assessment of Affordable Home Ownership Housing for Key Workers in St Albans and South West Hertfordshire". Below is its

conclusion about the number of such homes needed during the emerging Local Plan period:

But as you can see from the submissions by Spatial Planning and Strategic Housing, our Assessment didn't even get a mention.

The Officer Report might explain why. Section 12, Informatives, lists the documents on which the Recommendation to Refuse has been based. As you can see there is no reference at all to the Housing Needs Assessment submitted with the Application! To be clear, it is published on the Council website but wasn't considered by any of your Officers.

Consequently, there's been a huge misunderstanding that the Addison Park scheme doesn't meet an Affordable Housing Need, when the only Housing Needs Assessment evidence available clearly demonstrates that the 330 houses meets just a fraction of the Need for Home Ownership Affordable Housing.

The consequences of this misunderstanding are incredibly serious, because it led Officers to treat the benefits of affordable housing for local Key Workers below that of market housing for wealthy couples from London and, consequently, to the flawed conclusion that "very special circumstances" don't exist.

What can you do? You can tell Officers to withdraw their Report and reconsider the Planning Balance again in the light of the demonstrable need for - and significant benefit of - 330 discounted affordable homes for Key Workers at Addison Park.

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

Because the SKM Green Belt Review says so ...

Please refer to the Legal Opinion attached to the email.

It seems clear that Officers were unaware that in December 2021, at a Planning Inquiry in which it was represented by Counsel, the Council ended all reliance on the SKM GBR.

Prior to the last draft Local Plan being Withdrawn, the Council had argued that the SKM GBR's consideration of a site must be taken into account. However, after that Plan was Withdrawn the Council assured the Inspector at the Burston Nurseries Appeal, that the SKM GBR should no longer play any role in decision-making.

This, of course, was consistent with the assurances the Council (again when represented by Counsel), gave to the Inspectors who Examined the Local Plan and who concluded that the SKM GBR was fatally flawed – especially in respect of sites for fewer than 500 houses.

It was also consistent with advice Senior Officers gave to Councillors at the Planning Policy Committee in February 2021 and the Local Plan Advisory Group in January 2022.

Consequently, the Officer Report has seriously misunderstood the validity of the SKM GBR. Unfortunately, as is clear from Officer statements to us during a Teams Meeting last month and in the Report published on Friday, the SKM GBR has been considered not just applicable but determinative.

It has also clearly prejudiced the Officers' assessment of the Site's contribution to the Green Belt. In his email to

McPartland Planning dated 10th March, the Case Officer wrote that housing is unacceptable here because "... this relatively open Green Belt site performs better in terms of the purposes of the Green Belt than other sites where housing has been approved".

But that judgment is based on reliance on the SKM GBR, which the Inspectors found to be fatally flawed in its consideration of sites for fewer than 500 houses and which the Council says has no role to play in decision-making.

Finally, of course, the contribution a site makes to the Green Belt is only part of the test set by the NPPF. The full test is whether or not the benefits of the scheme outweigh the harm to the Green Belt and any other harm. Our case is that a scheme comprising discounted affordable housing for local essential workers delivers far greater benefits than schemes at those other sites delivering 60% market housing which exclude local Key Workers but attract wealthy buyers from London. And we're sure that the tens of thousands of people in the District who, not so long ago, stood outside their doors applauding NHS Workers, would agree.

What can you do? You can conclude that the harm to the Green Belt is no worse here than at other sites where permission has been granted, and that that harm is clearly outweighed because the benefits of local homes for local heroes is far greater than schemes with 60% market housing.

Because there are objections from HCC Highways and Minerals ...

In February 2022, eleven months after we began our Pre-Application work with Hertfordshire Highways, they unexpectedly raised what they described as "light touch" concerns. We immediately re-engaged with them to address those concerns and asked St Albans Officers to delay taking the Recommendation to Committee until that work had been done and Herts Highways re-consulted. The Officers refused. The work is being done and will be ready ahead of the PRC in May.

Despite the fact that they didn't require investigations at

other undeveloped Green Belt sites in the District that are also in the Sand and Gravel Belt, Herts Minerals insisted on one being done here. Drilling took place between 15th and 17th March and the results are expected in April. Again, we asked St Albans Officers to agree to an extension and, again, they refused.

What can you do? You can vote to defer the Decision on this application until the work demanded by statutory consultees has been completed.

And why are you being asked to *approve* housing for essential local workers?

Because it's absolutely needed and everyone knows it ...

Dear Sir/Madam,

I am writing to you today to show my support for the Addison Park housing scheme.

My partner is a midwife at East and North Herts Hospital and I am a firefighter at St Albans Fire Station.

Whilst we both love our careers, the wage that we are both on means that we cannot live near to where either of us work. We live outside Hertfordshire, meaning both of our commute times are close to an hour on a good day.

Neither of us joined our professions for the money, but if we were able to have the opportunity to live in St Albans this would have a massive impact on our quality of life. An opportunity we might not have as housing prices in Hertfordshire are often outside our price range.

We would both like to express our support for this scheme as we are also planning to start our own family in the not so distant future. In order to do that we would have to relocate to a more affordable area, which would mean leaving our current roles as our current wages would not be sufficient.

We hope the planning gets approved and look forward to hearing about it soon.

Names and address withheld. Comment Ref. no: 9252217

To whom it may concern,

In regards the planning application, reference number 5/2021/3194, I wish to express my wholehearted support towards the application.

It is a noble initiative set out by the planning applicant which seeks to provide affordable accommodation to armed forces members and emergency services personnel.

I myself am a veteran of the armed forces, and a current serving member of the emergency services working in London. Unfortunately in today's housing market it is near impossible to get a foothold in the housing market for young emergency services personnel around London. Initiatives such as this are their, and also mine only hope to own my own property without being completely riddled with debt.

I do hope this application is granted approval and homes can be provided for those whose occupations are so truly critically to us all.

Name and address withheld. Comment Ref. no: 9218500

Please visit: www.addisonpark.co.uk

