

CD 4.77

Proof of Evidence

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The Planning Crisis in St Alban and the implications for Key Worker housing

Section 78 Appeal by Headlands Way Limited

Land North of Chiswell Green Lane, Chiswell Green, St Albans AL2

Planning Inspectorate Ref: APP/B1930/W/22/3312277

LPA Ref: 5/2021/3194

MRP Planning – March 2023



Outline application (access sought) for the demolition of existing buildings and 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 and highways works including new foot and cycle path and works to junctions.

March 2023



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“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**, where recruitment or retention difficulties apply ...”

Source: St Albans City & District Housing Needs Survey Update, 2006 (DCA), Glossary

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Personal Statement

I have a BA (Hons) in Geography and an MSc in Urban and Rural Planning and am a Chartered Member of the Royal Town Planning Institute. I am familiar with the St Albans District and its 1994 Local Plan and, since 2009, with the Council's attempts to adopt a new Local Plan.

This Proof of Evidence has been prepared and is given in accordance with the guidance of the RTPI's Code of Professional Conduct (Feb 2023) and I confirm that the views expressed are my genuine professional opinions.

Declaration of Interests:

Through my company, McPartland Planning Limited, I have funded the costs of the Application and Appeal and will benefit financially if outline permission is granted.

As stated on the Application Form, I am related to an employee of St Albans City and District Council.

Brian Parker

March 2023



1 Introduction

1.1 This Proof of Evidence has been prepared by Brian Parker of MRP Planning¹ on behalf of McPartland Planning Limited and its Client, Headlands Way Limited. It examines the following matters in order to provide the context in which a scheme to provide affordable home ownership to some of the most valuable members of the community (“the Appeal Scheme”) was Refused by St Albans City and District Council (“the Council”), leading to the Appeal:

- i. The Council’s ineffective and failed approach to Plan-making, leading to chronic Planning and Housing crises in St Albans and resulting in “a critical situation” and “an extremely ... acute position” (in the words of as senior Inspector in a recent decision letter²) so far as affordable housing is concerned, a situation which is more fully considered in the Proofs of Evidence of Annie Gingell and Steven Fidgett;
- ii. The ongoing indifference of the Council to identifying, let alone meeting, the affordable housing need of the community’s “essential local workers”³ (otherwise known as Key Workers), who are the only group of individuals specifically identified in the definition of “affordable housing” in the Glossary of the National Planning Policy Framework (“the NPPF”) (CD 7.1)⁴; and
- iii. The serious implications of both of the above for the housing, locally, of Key Workers in St Albans.

1.2 Whilst defining what it meant by Key Worker housing in March 2004 (CD 8.17 [5.12]), the Council has never measured the need of those Key Workers and excluded them from its planning process.

1.3 My credentials are:

¹ MRP Professional Services Limited t/a MRP Planning.

² Land off Bullens Green Lane, Colney Heath per Inspector Masters, at [54] (CD 9.2).

³ Defined in the NPPF 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.”

⁴ “... 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); ...”.

- i. I hold a BA (Hons) degree in Geography from Leicester University (1985) and an MSc in Urban and Rural Planning from the University of the West of England (2017). I am a Chartered Member of the Royal Town Planning Institute;
 - ii. I have 13 years’ experience in Town Planning and act for a variety of clients, including householders, developers, agents and landowners; and
 - iii. I am particularly familiar with the St Albans District and, since 2009, with the Council’s efforts to replace its extant Local Plan, the 1994 Local Plan Review.
- 1.4 I have lived in St Albans since 1990 and consider myself to be “a local” and, consequently, part of the community which has been poorly served by a Council that has proved incapable of producing an up-to-date Local Plan.
- 1.5 This Proof will focus on my personal experience and knowledge of the Council’s actions – and inactions – during the past 13 years, and the implications of the same for affordable housing in general, and for affordable housing for Key Workers in particular.
- 1.6 It is appreciated, of course, that what matters most for the purposes of this Inquiry is not the the Council’s past a history of failure, however lamentable, but what the current situation means for decision-makers. However, the history of past Council failure is highly relevant to the necessary approach to decision-making, not only because these failures demonstrate the Planning Crisis in the District which urgently need addressing, but also because they reveal a comprehensive inability of the Council to address these issues itself:
- i. Whilst all Local Planning Authorities are required to have an up-to-date Local Plan in a genuinely Plan-led system (CD 7.1 [15] and [33]), the Council’s Local Plan, the St Albans District Local Plan Review 1994 (CD 8.1), is over 28 years old;
 - ii. Whilst “providing a significant boost in the delivery of housing” is a key priority for the Government (CD 7.1 [60]), since 2013 the Council has been unable even to demonstrate a 5-year supply of deliverable housing sites as required by the NPPF (CD 7.1 [74-77] and [11 footnote 8]);

- iii. Whilst the group “essential local workers” is the only group explicitly referenced in the NPPF’s definition of affordable housing, the Council has never attempted even to measure the affordable housing needs of its Key Workers, still less to meet them; and
- iv. The Council’s ineffectiveness in all these regards has significant negative implications for local NHS staff, teachers, police officers, fire fighters, care workers, members of the armed services and local government workers and, as a direct consequence, for the people who rely on them – in other words, everyone who lives in St Albans and many who live nearby.

1.7 Section 2 of this Proof describes the Proposal.

1.8 Section 3 considers the planning and housing crises in St Albans and their impact on affordable housing in general, and on affordable housing for Key Workers in particular.

1.9 Section 4 sets out how and why the situation for Key Workers will only worsen unless the Council changes tack.

1.10 Section 5 considers the viability and benefits of the Addison Park model in creating a balanced community.

1.11 Section 6 sets out my Conclusions.

2 The Proposal

2.6 The Appeal Scheme, Addison Park, is named after Sir Christopher Addison, the country's first Health and Housing Minister and the champion of the "homes fit for heroes" policy after the First World War. So inspired, Addison Park seeks to redress some of the serious imbalance caused by the Council's indifference to Key Workers who are, by definition, "essential for the balanced and sustainable development of the local community" (CD 4.77.2 (Glossary)). It does so by delivering up to 330 affordable homes exclusively for them, and discounting each by at least a third (CD 4.21, p. 6) - far more than the discounts required to qualify as affordable housing (CD 7.1 [affordable housing definition, Glossary]).

2.7 The Indicative Proposed Site Layout shows how the Appeal Site might accommodate a development of up to 330 dwellings (see Fig. 1 below).



Fig. 1 Indicative Proposed Site Layout

2.8 The quantum and mix of dwellings may change at the Reserved Matters stage, subject to discussions with the Council. However, the current indicative mix of house sizes informs the draft S106 Agreement (CD 4.69).

2.9 Access is a matter for approval and is set out in detail in the Transport Assessment (CD 4.26-4.28 and plans CD 4.29.1-4.29.5); Transport Assessment Addendum (CD 4.44 and Plans CD 4.45.1-4.45.4); and Travel Plan (CD 4.30-4.31).

2.10 As confirmed in the draft S106, the housing is for Key Workers as defined in the Council's Affordable Housing Supplementary Planning Guidance ("SPG") (CD 8.17 [5.12]), albeit supplemented by military personnel, an inclusion which is consistent with both:

(i) The definition of "essential local workers" in the NPPF⁵; and

(ii) The Council's adoption of the Hertfordshire Armed Forces Covenant, signed in December 2011 and reaffirmed in December 2021 (CD 4.77.3)⁶.

2.11 As elaborated on in paragraphs 4.3-4.4 below, the dwellings will help those essential local workers who earn too much to qualify for social housing, but too little to afford their own homes in one of the most expensive places in the country (CD 4.21 [3.3]). In this latter regard:

i. The median house price in the District of St Albans in year ending Sept 2021 was £585,000, the eighth highest in England including Districts in London⁷; and

ii. On 31st August 2021, the MP for St Albans and the Council Leader wrote to the then Secretary of State, Rt Hon Robert Jenrick MP⁸, correctly asserting that:

⁵ See footnote 3 above.

⁶ The Covenant refers to social housing and the Appellant believes military personnel should not be excluded from this opportunity to own their own home.

⁷ ONS "House price to workplace-based earnings ratio" Table 5a Median house price by Local Authority

⁸ Local Government Association, Liberal democrat Group, Case Ref: DC16862

“Hertfordshire Liberal Democrats know people are struggling to afford good homes in the right location, that house prices are too high, and the possibility of owning your own home seems remote for many people...”

2.12 As is more fully considered in the Proofs of Evidence of Annie Gingell and Steven Fidgett, the unaffordability of housing in St Albans necessarily makes the provision of affordable housing in St Albans even more important and increases the weight to be attached to its delivery.

2.13 Furthermore, as already noted in paragraph 1.1 (ii) above, “essential local workers” is the only group of people specifically identified in the NPPF’s definition of “affordable housing” which states as follows in the most relevant part:

“Affordable housing: 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) ...”

2.14 Accordingly, if one is looking to deliver the right housing for the right people in the right place, the Government’s definition tells us:

- i. Who to house (amongst others in housing need) – essential local workers “whose needs are not met by the market”;
- ii. How to house them – affordably, including through “housing that provides a subsidised route to home ownership”;
- iii. The priority to be attached to housing them affordably – “essential”; and
- iv. Where they need to be housed – “locally”.

2.15 Consistent with this, and as covered in more detail in Section 5 below, for the last 22 years the Government has promoted policies which are explicitly aimed at Key Workers achieving home ownership: from the Starter Home Initiative in 2001 (CD 4.77.4 [0.53]) to the First Homes policy of today (PPG, first published in 2021). The rationale which underpins that ongoing national planning policy imperative is obvious: the essential local services which Key Workers deliver are

themselves at risk if those workers are priced out of local housing and choose to live elsewhere – in other words, if they cannot be recruited or retained.

- 2.16 This was correctly understood, and expressly stated, in the July 2022 Third Report of the House of Commons' Health and Social Care Committee, *"Workforce: Recruitment, Training and Retention in Health and Social Care"*, which found as follows at paragraph 66 of its Conclusions and Recommendations (CD 4.77.5), in terms which are equally applicable to all categories of Key Workers:

"Wider market forces, including the rising cost of living, a lack of affordable housing, and a lack of public transport in remote locations are having an impact on the recruitment and retention of health and social care workers. These issues manifest differently across the country, and it is clear that without action to address these wider issues, the NHS and social care sectors will continue to struggle to recruit and retain staff."

- 2.17 Given the high house prices in St Albans, it is more than reasonable to conclude that the recruitment and retention of Key Workers is at least as severe in St Albans as it is anywhere in the country, and partly because they are unable to buy a home in the local community they serve.
- 2.18 Addison Park therefore provides just the sort of solution that national policy says is needed in a locality like St Albans.

3. The Planning Crisis in St Albans

3.1 The planning system comprises two separate but inter-related elements: Plan-making and decision-taking. This Section demonstrates how St Albans Council is failing in both.

Plan-Making

3.2 Section 3 of the NPPF (CD 7.1) begins, at paragraph 15, with the following:

“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings”.

3.3 However, so far as the St Albans District Local Plan Review 1994 is concerned:

- i. At 28 years of age, it is the least up-to-date Local Plan in England and is rooted in the ancient past rather than providing a vision for the future;
- ii. It is clearly so out-of-date as to be not fit-for-purpose as a framework for addressing current housing needs and other priorities – the Green Belt boundaries have not been revised since 1985, some 38 years ago, and there are no up-to-date housing targets or undeveloped allocations; and
- iii. It has not acted as a platform for local people to shape their surroundings since it was consulted upon in the early 1990s.

3.4 Furthermore, paragraph 33 of the NPPF (CD 7.1) states that “policies in local plans ... should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary”. However, the St Albans Local Plan comprises policies which have not been reviewed since they were adopted in 1994, that is to say:

- i. 20 years before the Planning Practice Guidance (“PPG”) went online;

- ii. 23 years before the Government published “*Fixing Our Broken Housing Market*”; and
- iii. 27 years before the current version of the NPPF.

3.5 In an Appeal Decision⁹ in September 2020, Inspector DM Young JP BSc (Hons) MA MRTPI MIHE referred to Uttlesford District Council’s 2005 Local Plan as being “painfully out of date in terms of its purpose, its strategy, its content and its housing delivery policies. It does not meet the requirement for the Council to have an up-to-date plan and it is clearly not a strong foundation upon which to refuse planning permission”. If a Plan Adopted in 2005 is “painfully out of date”, then the St Albans’ Local Plan (which is 11 years older) is even more so.

3.6 As I come onto below, the reasons which underpin the failure of the Council to adopt an up-to-date Local Plan include its repeated failure to gather robust evidence and listen to expert advice, in other words to undertake Plan-making properly and professionally. It is this failure, together with a lack of Council ambition for the delivery of affordable housing which explains why there is a “critical” and “extremely acute”¹⁰ affordable housing crisis in St Albans.

3.7 The Council’s lack of ambition for the delivery of affordable housing is made clear in paragraph 6.10 of the Council’s Statement of Case in this Appeal: whilst “substantial” weight is attributed by the Council to the Appeal Scheme’s contribution towards meeting general housing needs, the Council states that this weight is “to be set at the lower-most end of the spectrum” because “the Appeal proposal ... is for 100% affordable housing”¹¹. That is quite extraordinary given the “substantial weight” recently placed on the delivery of affordable housing in St Albans in Inspector Masters’ decision letter in respect of Bullens Green Lane (CD 9.2), where she stated as follows, at [54]:

“The persistent under delivery of affordable housing in ... presents a critical situation. Taking into account the extremely acute affordable housing position in ... SADC ..., I attach very substantial weight to the delivery of up to 45 affordable homes in this location in favour of the proposals.”

⁹ Appeal Ref: APP/C1570/W/19/3242550 paragraph 16.

¹⁰ Land off Bullens Green Lane, Colney Heath per Inspector Masters (CD 9.2), at [54].

¹¹ That is a clear about-turn from the comment in the Officer Report on the Appeal application (Ref: CD 4.48 [8.8.10]) in which “very substantial weight” was stated to attach to the delivery of 100% affordable housing.

3.8 Worse still, the same paragraph of the Council’s Statement of Case also reflects an inexplicable indifference to the delivery of Key Worker housing, an essential attribute of the Appeal scheme, but one which is not even mentioned as a “benefit”, and not mentioned despite the essential nature of the services that Key workers provide; their specific inclusion in the definition of affordable housing in the NPPF (CD 7.1 [Glossary]); and their inclusion, also, in the Council’s own Affordable Housing SPG (CD 8.17 [5.12]).

3.9 Taken together, these three failings – a failure to plan properly, a lack of ambition towards securing the critically-needed affordable housing, and an indifference to the delivery of Key Worker housing – explain both why the Council was opposed to the Appeal Scheme from the start, and why the Council will never deliver sufficient affordable housing for Key Workers without external intervention. Accordingly, I consider each of these three failings in turn below.

Inability to Plan

3.10 The extant Local Plan was Adopted in 1994. It is the oldest Local Plan in England and was examined in a different era, and urgently needs to be replaced in a genuinely Plan-led system (CD 7.1 [15 and 33]). Indeed, it has needed to be replaced for many years – it effectively expired some 22 years ago being intended to cover the period from 1986 to 2001¹².

3.11 The imperative to replace the strategic policies within the Local Plan extends not just to Green Belt boundaries and housing allocations to meet objectively assessed needs, but to affordable housing too, including Key Workers. In particular:

- i. Whilst Policies 7a and 8 of the St Albans District Local Plan Review 1994 (CD 8.1) sought to deliver 200 affordable homes per annum, the text stated that this target “... probably represents a considerable under-estimation of the total need for affordable housing” (paragraph 3.36):
- ii. That has proved to be true - the oldest document in the Council’s evidence base under “Housing” is the Housing Needs Survey Update by David Couttie Associates (“DCA”),

¹² Policy 3 Housing Land Supply 1981-1996 and 1986-2001

and this identified “an annual affordable housing shortfall of 822 units a year ...” as long ago as 2006 (CD 4.77.2 [7.3.2]);

- iii. Furthermore, the 1994 Local Plan contains no reference to Key Workers at all, despite the inclusion of “essential local workers” in the NPPF definition of “affordable housing” since 2018 (CD 7.1 [Glossary]).

3.12 However, the Council’s attempts at replacing its ancient Plan have failed primarily because of its unwillingness to gather robust evidence and listen to expert advice. The following identifies just some examples over the past 13 years.

The Local Development Framework Core Strategy – 2006-2021

3.13 The Local Development Framework Core Strategy (“the LDF”) was drafted in a different planning context to the 1994 Local Plan. By the time it was consulted upon in 2009:

- i. In 2001, the Government had introduced the Starter Homes Initiative, the first dedicated home ownership programme for Key Workers – replaced in April 2004 by the Key Worker Living programme;
- ii. In March 2004, the Council had published its Affordable Housing SPG (CD 8.17) and, in a section on Key Workers, the SPG identified a specific problem and the need for a solution (CD 8.17 [3.12-3.13]):

“There are growing difficulties in the provision of housing for workers on lower incomes necessary for the economic health of the County. Hertfordshire County Council has concluded that if nothing is done then the most likely scenario is one of growing polarisation, more and longer commuting, and poorer personal and public service sectors. A specific research study of the housing needs of key workers across the County has been undertaken. Housing problems are predicted to worsen both in terms of affordability and access.

A strategy to provide affordable housing will increasingly have to address the provision of housing for these key workers.”

The SPG also defined key workers (CD 8.17 [5.12]);

“Key workers are 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.”; and

- iii. In 2006, the St Albans City and District Housing Needs Survey had been published, which defined Key Workers as follows (CD 4.77.2: Glossary p.42):

“any person who directly provides services that are essential for the balanced and sustainable development of the local community and local economy, where recruitment or retention difficulties apply’, and includes teachers, nurses, other public sector workers and employees of businesses considered vital to sustaining the economy of an area”.

The Survey found (CD 4.77.2 [7.3.2-7.3.3]):

“... an annual affordable housing shortfall of 822 units a year ...”; and

“... 1,966 existing households and 1,234 concealed households intend to leave the District over the next five years because of a lack of affordable housing.”

3.14 Furthermore, the Planning and Compulsory Purchase Act 2004 had introduced Regional Spatial Strategies (“RSSs”), and made them the top tier of the statutory Development Plan in all regions of England except London. The East of England Plan (“EEP”), which covered Norfolk, Suffolk,

Cambridgeshire, Essex, Bedfordshire and Hertfordshire, including the St Albans district, stated as follows (CD 4.77.6 [5.7 and 5.8]):

- i. *“The widening of the ratio of house prices to incomes makes it increasingly difficult for those on low incomes and many key workers to obtain decent accommodation in reasonable proximity to their workplace. An adequate supply of good, affordable housing is essential to the quality of life of those of the region’s residents who cannot afford to compete in the open market.”* and
- ii. *“Housing stress varies across the region and targets of more than 35% may be justified in the more pressurised areas. PPS3 indicates that separate targets should be set for social rented and intermediate housing where appropriate.”*

3.15 For St Albans, the EEP proposed a minimum housing target of 360 dwellings per annum (“dpa”)¹³ and a minimum affordable housing target of 35%¹⁴.

3.16 Whilst, in 2004, the mean housing affordability ratio for St Albans was 10.28¹⁵, the highest in the East of England, the Council’s LDF sought only to adopt the EEP’s minimum targets with no uplift to take account of “housing stress”.

3.17 Despite the clear direction provided by the EEP; the Government’s Key Worker programmes; the Council’s SPG; and the identified affordable housing need of 822 dpa, the Council’s LDF also sought to deliver just 126 affordable dpa (35% of 360), far fewer than its 1994 target of 200 dpa and just 15% of the identified need. Furthermore, like the extant Local Plan, the LDF also contained no specific policy for Key Workers.

3.18 To meet its unambitious affordable housing target, the LDF included 8 “Areas of Search”: potential sites in the Green Belt for new housing identified without the benefit of a formal

¹³ Policy H1, Regional Housing Provision 2001 to 2021

¹⁴ Policy H2, Affordable Housing

¹⁵ ONS House price to workplace-based earnings ratio England and Wales 1997-2021, Table 5c

Review. In November 2009, however, and following an LDF Advisory Visit, Inspector David Vickery wrote as follows¹⁶:

“I was told that it was likely that sites would have to be found in the Green Belt to meet the RSS housing requirement. Although the numbers could be quite high, it seems that this would not be a regional strategic review, but a local adjustment. The CS must face this particular Green Belt issue and deal with it – it cannot be left alone. There has to be a clear and decisive answer in it.”

3.19 However, the Council rejected the Inspector’s advice. Instead of facing the issue, on 21st January 2010 the Cabinet formally decided to withdraw all 8 Areas of Search and start again.

The Core Strategy Spatial Strategy 2011-2028

3.20 The Council began its next iteration of a replacement Plan in July 2010, following a change in Government policy to promote Localism. By now, the affordability ratio had risen to 12.36 - again, the highest in the East of England¹⁷. However, and without any reference to a new Housing Needs Assessment, the Council set a housing target of just 250 dpa, a significant reduction from the minimum target of 360 dpa in the EEP, and lower, even than the 480 dpa in the 1994 Local Plan (CD 8.1 [Policy 3 (ii)]).

3.21 Two years later, in a Report to Cabinet on 28th November 2012 (CD 4.77.7 [4.10]), the Council would claim that: “It is very difficult to condense a very detailed process of getting to the 250 target”. However, the true explanation for the annual target of 250 dpa is that it was not a result of a very detailed process at all, but a very simple one (albeit flawed), arrived at during Planning Policy Advisory Panel meetings which I attended in person:

- i. First, the Council admitted it had struggled to deliver the 200 affordable dpa required by the 1994 Plan, so, simply cut that target in half; and

¹⁶ “PINS LDF Advisory Visit – St Albans Core Strategy” Inspector Vickery’s Advice Note, November 2009, paragraph 5. Online at: http://www.stalbans.gov.uk/Images/EB-InspectorsAdviceNote_tcm15-11188.pdf

¹⁷ ONS House price to workplace-based earnings ratio England and Wales 1997-2021, Table 5c

- ii. Secondly, by increasing the affordable housing contribution from 35% to 40% and requiring it from every new dwelling, arithmetically 150 market homes would be required to deliver 100 affordable homes; hence, an annual target of 250 was set (100 + 150).

3.22 The 20-page report by officers in 2012 titled “*St Albans City and District Strategic Local Plan – A Local Housing Target*” (CD 4.77.8), which concluded that the 250 dpa target took account of “... all relevant aspects, including market factors” and allowed for “flexibility and contingency”, is an unedifying attempt to rewrite history.

The Strategic Local Plan 2011-2031 (Version 1)

3.23 By September/October 2012, when the Local Services Scrutiny Committee received, reviewed, and made revisions to the latest drafts of what was now referred to as the Strategic Local Plan (“the SLP”), the affordability ratio in St Albans had risen yet further to 12.47¹⁸. Despite this, however, the final draft of the SLP retained the housing target of 250 dpa. This target of just 250 dpa was proposed to be met, in part, by delivering up to 350 homes on a greenfield Green Belt site at Oaklands College¹⁹: a site selected without any Green Belt Review having been undertaken (CD 4.77.9)²⁰.

3.24 On 18th October 2012, the Cabinet resolved that “the SLP be referred to Council on 28 November to seek their decision to proceed with the Pre-submission publication” (Report to Council CD 4.77.7). However, the November meeting of the Full Council received a petition from a Residents’ Association, the “*No Oaklands Housing Action Group*”, which demanded the Council pause the SLP to allow (amongst other things) for a Housing Needs Assessment and a Green Belt Assessment to take place. The petition was carried by the Mayor’s casting vote, and the SLP was withdrawn from consideration. To be clear, three years after the LDF Core Strategy was published for Consultation, a third iteration of a replacement Local Plan was withdrawn after local residents had demanded the Council carry out studies that any competent Local Planning Authority would have already carried out.

¹⁸ ONS House price to workplace-based earnings ratio England and Wales 1997-2021, Table 5c

¹⁹ It is to be noted that Oaklands College sought to include an unknown number of Key Worker houses “for educational staff” (CD 4.77.10).

²⁰ The Petition Statement criticised the Council for ignoring Inspector Vickery’s advice (CD 4.77.9 [p.13] and recommended a Green Belt Boundaries Study (CD 4.77.9 [p.19]).

The Strategic Local Plan 2011-2031 (Version 2)

3.25 Following the above decision, in January 2013 the Cabinet approved the terms of reference for two studies, pursuant to which:

- i. Sinclair Knight Merz Enviro (“SKM”) was commissioned to carry out a Green Belt Review (“the SKM GBR”) of large-scale across strategic sites (more than 500 dwellings or 14 ha) across St Albans, Dacorum and Welwyn Hatfield; and
- ii. Housing Vision was commissioned to produce a Housing Needs Assessment (“the Housing Vision HNA”).

The SKM Green Belt Review

3.26 On 7th October 2013, the newly formed Planning Policy Committee (“the PPC”) received Part 1 of the SKM GBR. Importantly, whilst SKM had been commissioned to identify only large-scale strategic sites for housing (CD 8.3a), Part 1 of the SKM GBR also identified a number of “small-scale” sites which SKM described as “non-strategic in nature which ... will not impact upon the strategic function of the Green Belt” and explicitly advised as follows in these regards (CD 8.3a [8.3.1]):

“... given the strategic nature of this study, this land will also need to be further assessed by planning authorities in more detail to fully consider wider issues which are not covered by in (sic) this report, but that must be considered in preparing Local Plans”.

3.27 Once again, however, the Council rejected the expert’s advice, as confirmed in Part 2 of the SKM GBR (CD 8.5 [1.1.4]):

“The small scale sub-areas identified in the Part 1 Study, and also recommended for further assessment, do not fall within the scope of this subsequent Sites and Boundaries Study”.

3.28 Accordingly, Part 2 of the SKM GBR ignored all smaller sites (less than 500 dwellings or 14ha) and excluded them from the Green Belt Review and Site Selection process, proceeding only to identify 9 large sites (later to be called “Broad Locations”).

The Housing Vision HNA

3.29 On 29th November 2013, the PPC received the “*Independent Assessment of Housing Needs and Strategic Housing Market Assessment: St Albans City and District Council*” from Housing Vision (CD 8.18). Whilst acknowledging the existence of both a “Wider Housing Market Area” and a “Peripheral Housing Market Area”, this study was also restricted - to the St Albans City & District boundary, on the asserted basis that a “Central Housing Market Area” approximated to the same boundary (CD 8.18 [ES 27]).

3.30 The sole recommendation in the Housing Vision SHMA can be found at CD 8.18, paragraph 6.27 (first bullet point on p.249 under “Key Findings”), where the housing need for the District 2011-31 is identified as 11,724 additional homes, equivalent to 586 dpa. The author, Dr Turkington, confirmed this was his sole recommendation during the PowerPoint presentation he made to the PPC: the relevant slide is reproduced below (Fig. 2).



The slide features a dark blue header with the title "The need for housing" in white text. To the right of the title is a decorative graphic consisting of several curved, overlapping lines in shades of red, orange, yellow, green, and blue. Below the header, the slide contains a bulleted list of statistics:

- **11,724 homes between 2011 and 2031**
- **An average of 586 per annum:**
 - 7% - 4 bed
 - 51% - 3 bed
 - 20% - 2 bed
 - 21% - 1 bed
- **Included in the above are 1,080 additional units for older people:**
 - for example, 402 Extra Care places

Fig. 2 The penultimate slide from Housing Vision’s PowerPoint presentation to SADC, 29th November 2013

- 3.31 Once again, however, the Council ignored the expert's recommendation. Instead, on 31st January 2014, the PPC decided the housing need was 450 dpa, 136 dpa fewer than that independently recommended by an expert and amounting to an accumulative planned shortfall against the true housing need of over 2,700 dwellings during the period of the proposed Replacement Local Plan 2011-31.
- 3.32 The PPC then spent several months deciding which of the 9 Broad Locations (or parts thereof), would be required to fulfil its lower-than-recommended housing target, which, by September 2014, the Council had further reduced to 436 dpa. A draft Plan underwent public consultation in October and November 2014, and, in July 2016, the Cabinet resolved to submit the SLP for Examination. Inspector Hogger was appointed as the Examining Inspector. However, having already expressed his disquiet about the soundness of the Plan in a letter dated 22nd August 2016, titled "*Preliminary Concerns of the Inspector*", Inspector Hogger then convened a pre-Examination public hearing to consider the Duty to Co-operate.
- 3.33 Having conducted that pre-Examination hearing, Inspector Hogger then issued a further letter, dated 28th November 2016 (CD 4.77.11), in which:
- i. He found that engagement had been neither constructive, active, collaborative nor diligent, such that the evidence was not robust, the necessary co-operation had not been provided, and mutual benefits had not been achieved; and
 - ii. He expressed concern over the strategic matter of housing and believed that the SLP would likely be found unsound (CD 4.77.11 [46]).
- 3.34 Because Inspector Hogger had found that the Duty to Co-operate has not been met (CD 4.77.11 [46]), and had concluded, accordingly, that the SLP was unlawful, he could not proceed to consider soundness matters, such as the SKM Green Belt Review.
- 3.35 True to form, the Council did not accept the Inspector's conclusions and submitted a Judicial Review challenging Inspector Hogger's decision. This, however, was dismissed in the High Court in July 2017.

3.36 The affordability ratio now stood at 16.62²¹.

The Local Plan 2020-2036

3.37 In September 2017, the PPC was advised by Officers that a new Local Plan was needed with a likely housing target of c.800 dpa based on a new Government formula. By May 2018, the Planning Policy Committee had concluded that all the sites identified in the SKM GBR (the Broad Locations) would be used, but other sites might be needed too (CD 4.77.12 [4.11-4.12]). One of these was the former Radlett Aerodrome, which was branded “Park Street Garden Village” and could deliver c.2,300 homes, albeit the site had already received Planning Permission from the Secretary of State on Appeal for a Strategic Rail Freight Interchange (Ref: 5/2009/0708).

3.38 In March 2019, the Cabinet resolved to submit the Local Plan for Examination, including an allocation of the former Radlett Aerodrome for housing. (In addition to this, and other proposed allocations, it should be noted that following a submission from St Albans School, the principal landowner of the site in question, Draft Policy S6 vi (North of St Albans), included a “minimum 10 essential local worker houses held in perpetuity for rent for local teachers”. Out of 12,345 homes to be built in the Green Belt under Draft Policy S6 i-xi, just these 10 would be for Key Workers, less than 0.1%: and only because the landowner proposed them.)

3.39 Ahead of the public hearings in January 2020, the Examining Inspectors (Inspectors Crosby and Worthington), raised a variety of concerns (CD 4.77.13), notably in respect of the Duty to Co-operate (again); the soundness of the Radlett Aerodrome Allocation given the Strategic Rail Freight Interchange permission; and the SKM Green Belt Review (a soundness issue which Inspector Hogger did not have the remit to consider in 2016 because the unlawful nature of the SLP prevented its examination).

3.40 The Stage 1 hearing sessions were held between 21st-23rd January 2020, during which Inspectors Crosby and Worthington heard discussion on legal compliance; the Duty to Co-operate; the spatial strategy; and matters relating to the Green Belt.

3.41 Following those Stage 1 hearings, the Examining Inspectors wrote to the Council on 27th January 2020 (CD 4.77.14), raising serious concerns in terms of legal compliance and soundness; and

²¹ ONS House price to workplace-based earnings ratio England and Wales 1997-2021, Table 5c

cancelling the subsequent hearing sessions which had been scheduled for February 2020. Thereafter, and by a letter dated 14th April 2020 (CD 4.77.15), the Examining Inspectors set out their concerns in detail, including on the Green Belt Review as follows:

“35. Strategic scale sites were defined as those capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares (ha) of developable land ...

36. This approach raises a number of concerns. As part of the fundamental approach stemming from 2013/14, smaller sites (less than 500 dwellings or 14ha) have been excluded from the Green Belt Review and site selection process ...

37. Overall, although previously recognised as a source of housing to be identified at some stage, smaller sites have been disregarded as part of the plan-making process. It is our view that this approach has ruled out an important source of housing that may have been to have a lesser impact on the purposes of the Green Belt than the sites selected without sufficient justification.”

3.42 However, it was the Duty to Co-operate issue which once again proved fatal. Not only was the Council unable to demonstrate “evidence of any constructive, active on-going engagement” with neighbouring Districts, but it had also failed to appreciate that preventing the delivery of the Strategic Rail Freight Interchange was a strategic issue (CD 4.77.15 [8-14]). Accordingly, and on 1st September 2020, the Inspectors invited the Council to withdraw this Local Plan, too (CD 4.77.16), and the Cabinet resolved to do so on 19th November 2020 (CD 8.34).

The Current Draft Emerging Local Plan

3.43 In December 2020, the PPC was held virtually because of ongoing Covid restrictions, and considered both the timing of and evidence for a new Local Plan:

- i. Timing-wise, a new Local Development Scheme (“LDS”) was agreed, which scheduled the Regulation 18 Consultation to take place in January/February 2022, and Adoption by the end of 2023; and

- ii. Evidence-wise, the LPAG was advised by Officers that the next draft Local Plan would be informed by the GL Hearn, September 2020, “*South West Hertfordshire Local Housing Needs Assessment on behalf of Dacorum, Hertsmere, St Albans, Three Rivers and Watford Council*” (“LHNA”) (CD 8.35). (Disappointingly, in these regards, some 16 years after the Council’s own SPG had recognised the need for a “strategy to provide affordable housing ... for ... these key workers” (CD 8.17), the LHNA made no attempt to measure their housing needs - even in the middle of the Covid Pandemic and when the essential nature of the services they provided was so obvious).

3.44 In May 2021, with the affordability ratio now at 17.32²², the PPC was decommissioned and a new Committee, the Local Plan Advisory Group (“LPAG”), was established the following month.

3.45 In March 2022, in response to an enquiry by a Councillor, Officers stated (albeit without explanation), that it was “very hard to conceive”²³ of a methodology to measure the need of Key Workers. This was despite Officers being in possession of the Key Worker Affordable Housing Needs Assessment (“Key Workers AHNA”) (CD 4.1) submitted with the Appeal Scheme.

3.46 Members were assured, however, that the issue of Key Worker housing would be investigated, and a Report brought to the Committee in September (see Fig. 3 below).

10. Other Business
Additional documents:

- [Webcast for 10.](#)

Minutes:

Councillor Curthoys noted that SADC’s Affordable Supplementary Planning Guidance (2004) had a definition for key workers and that affordable homes for key workers was an issue for the District. Spatial Planning Manager had discussed the issue prior to the meeting with Councillor Curthoys. The Chair agreed that the Group would receive a Report on housing for key workers, and how this can be potentially addressed in the Local Plan, in September 2022.

Fig. 3 extract from Minutes of LPAG meeting 1st March 2022

3.47 The LPAG’s Work Programme in June 2022 confirmed that a Key Workers’ Housing Report would be published in September (CD 4.66).

²² ONS House price to workplace-based earnings ratio England and Wales 1997-2021, Table 5c

²³ Verbatim extract from webcast of LPAG (Parker, 2022)

3.48 However, no such Report was ever received by the LPAG, and the issue was dropped from the Work Programme without explanation (CD 4.67).

3.49 Further, as noted in paragraph 3.43 above, in December 2020 a new LDS was agreed which scheduled the Regulation 18 consultation to take place in January/February 2022. However, in September 2022, some 8 months after it should have taken place, the LPAG changed the LDS and the Regulation 18 consultation was re-scheduled to take place in July/September 2023, with Adoption moved to the end of 2025.

3.50 Yet further, and at the LPAG in January 2023, the Chair (and Council Leader) declared the true extent of the Council's ambition for meeting the housing needs of its local communities, including for Key Workers²⁴:

"The basic thing, I think, we want as a Council is not to build on the Green Belt, number 1 ... and 2, to have housing numbers which actually allow that to happen".

Conclusion

3.51 The Council clearly struggles with both the concept and process of Plan-making.

- i. Over the past 13 years, whilst the affordability of housing has worsened considerably, it has repeatedly procrastinated and prevaricated;
- ii. It has ignored and misinterpreted expert advice on multiple occasions;
- iii. It has twice failed to comply with the Duty to Co-operate;
- iv. It has set housing targets and selected sites without studies which reasonable planning professionals would have considered fundamental to the Plan-making process;
- v. The most recent delay to the Local Plan timetable means that there will be no new, adopted, Local Plan allocations until the end of 2025 at the earliest; and

²⁴ Verbatim extract from recording of LPAG, 24/01/23 from 58' 44" (Parker, 2023)

- vi. Even after the Covid Pandemic transformed the lives of the nation and its appreciation of Key Workers, both the Council and the GL Hearn September 2020 LHNA, which is “informing” the Council’s current emerging Local Plan, continue to ignore the affordable housing needs of its essential local workers.

Lack of Ambition for Affordable Housing

3.52 As noted in paragraphs 3.11 (i) above, the 1994 Local Plan admits that the target of 200 dpa “probably represents a considerable under-estimation of the total need for affordable housing” (CD 8.1 [3.36]); and the 2006 Housing Need Survey Update identified “an annual affordable housing shortfall of 822 units a year ...” (CD 4.77.2 [7.3.2]). However

- i. Rather than increase its affordable housing target, in 2010 the Council decided to halve it to 100 (see paragraph 3.21 above). In seeking to achieve this reduced target, one which had been plucked entirely out of thin air, the Council sought to increase the affordable housing contribution from 35% to 40%, as originally recommended by DCA in 2006 (CD 4.77.2 [7.4.2]).
- ii. Whilst from 2014 onwards the PPG has advised that an “... increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes”,²⁵ no such increase has ever been proposed by the Council; and
- iii. Whilst, in its most-recently withdrawn Local Plan, the Council acknowledged that 75% of all houses needed in the District for the period 2020-36 were affordable homes (CD 8.2 [Appendix 6]), it chose not to increase the housing figure generated by the Standard Methodology to deliver them; instead of the 75% needed, chose to impose an affordable housing contribution of just 40% on schemes of 10 or more houses (CD 8.2, p.25), the same 40% contribution target as was sought in the 2016 and 2018 emerging SLPs.

3.52 The Council explained this latter decision as follows (CD 8.2 [Appendix 6]):

²⁵ Planning Practice Guidance: “What is the total need for affordable housing” Ref: ID-2a-029-20140306 (the text has changed slightly in subsequent versions).

“As is very common in SHMAs, they show considerably greater need for Affordable housing than Market housing in the District. In this case, the same table shows more than 75% of all housing need in the District is for Affordable homes and less than 25% for Market homes. The Council, similarly to almost all, has had to take a view on balancing seeking to meet the identified needs most closely and what is actually deliverable through the planning system. A 75% Affordable and 25% Market split has no reasonable prospect of being delivered.”

3.53 However, I can find no evidence to justify the Council’s claim that there was “no reasonable prospect” of a 75:25 split being delivered through the planning system in an area of such high house prices; nor can I find evidence as to why an affordable housing contribution of 40% was considered the most that could be achieved. Ironically, of course, the Appeal Scheme demonstrates that, with the right model, it is possible to deliver far more than even 75% affordable housing.

3.54 In the meantime, affordability has continued to worsen, as covered in the Proof of Evidence of Annie Gingell. The most recent housing study, the September 2020 GL Hearn LHNA (8.35), suggests the split is now 93% affordable and 7% market (CD 4.1 [2.6]). However, because of its tardy and unambitious approach to Plan-making, it is unclear whether the Council will stick to the 40% target recommended 17 years ago (CD 4.77.2 [7.4.4]); match neighbouring Three Rivers District Council, which has a 45% affordable housing contribution²⁶; emulate nearby London Borough of Islington’s 50% target²⁷, or set goals closer to the identified need.

Indifference to Key Workers

3.55 Whilst there is no mention of Key Workers in the 1994 Local Plan, as noted in paragraph 1.2 and 3.13 above, the Council’s 2004 Affordable Housing SPG both acknowledges that Key Worker housing is a form of affordable housing (CD 8.17 [5.2]), and contains a definition of the employment categories which qualify as Key Workers. Likewise, the DCA 2006 Housing Needs Survey also defined Key Workers (see paragraph 3.13 above). However, despite these definitions, from 19 and 17 years ago respectively, the Council has never attempted to measure what the Key Worker housing needs might be.

²⁶ Policy CP4 of Three Rivers District’s Council Core Strategy, Oct 2011

²⁷ Policy CS12 of London Borough of Islington’s Core Strategy, Feb 2011

3.56 And yet it was, and remains, entirely possible to do so. In 2007, for example, Fordham Research published a Housing Needs Assessment for Haringey Council, Section D of which assessed “The Needs of Particular Groups”, including Key Worker Households (CD 4.63 [Chapter 15]). The Fordham assessment looked, amongst other things, at the number of Key Workers in the Borough; their housing and household characteristics; the income and affordability of Key Worker households; and their housing preferences, and concluded as follows:

- i. Around 14.7% of the net affordable housing requirement in Haringey came from Key Worker households (CD 4.63 [15.8]); and
- ii. Key Worker households in Haringey were less likely than non-Key Worker households to want private rented or social rented accommodation: owner-occupation was the preference for 83.8% of key worker households compared to 58.8% of non-key worker households. (CD 4.63 [15.5]). (Notably, a 2003 study by DCA for Dacorum Borough Council, likewise found that 83% of Health Workers and 100% of Education and Local Authority workers preferred owner-occupation (CD 4.77.17 [6.2.8]).

3.57 However, St Albans Council has attempted absolutely nothing of this kind. Key Workers have been, and remain, entirely excluded from the Council’s evidence base on housing needs. Moreover, as explained in paragraph 3.48 above, last year the LPAG dropped its fleeting interest in Key Worker housing from the Work Programme without explanation.

3.58 Since the Planning Committee had dropped the issue, in October 2022 I submitted a Public Question to the Housing and Inclusion Committee for its meeting on 3rd November 2022 (CD 4.77.18). A few hours before the meeting started, I received an email informing me that the Question would be deferred to January 2023 to give the Chair the opportunity to consult. At the meeting in January, a written answer was published, albeit with no discussion taking place (CD 4.77.19). The Housing and Inclusion Committee insisted, first, that affordable housing need was the sole responsibility of the LPAG, the Committee which had dropped Key Worker housing from its Work Programme; and, secondly, that:

“This Committee is focused on and committed to delivering social rent housing on land within the ownership of the Housing Revenue Account and ensuring the Allocations Policy is meeting the needs of those who require social housing.”

- 3.59 The Committee’s refusal even to discuss affordable housing for Key Workers, including military personnel, is both perplexing and revealing given that the document setting out Housing and Inclusion Committee’s responsibilities (CD 4.77.20), confirms they include the “Armed Forces Covenant”; “Housing Options & Policy”; and “Housing strategy including social and affordable housing”.
- 3.60 In any event, since the Council has failed even to attempt to assemble a relevant evidence base on Key Workers’ housing needs, the Key Worker AHNA (CD 4.1) submitted with the Appeal Scheme, as peer-reviewed and expanded upon the expert evidence of Annie Gingell, is, currently, the best and most up-to-date evidence that there is with regard to the extent of those needs in the locality of St Albans.
- 3.61 Furthermore, that best and most up-to-date evidence has to be seen in the context of DCA’s Housing Needs Study in 2006 (4.77.17), which stated that Key Workers provide “services that are essential for the balanced and sustainable development of the local community and local economy”. Accordingly, those workers are not just part of a balanced community, they are indispensable to it.
- 3.62 And yet despite this, and despite the fact that “essential local workers” is the only group explicitly mentioned in the NPPF’s definition of affordable housing, the Council continues to exclude them from its Plan-making process. The inevitable consequence of excluding Key Workers from the evidence base is, of course, that they have been, and will continue to be, excluded from draft Plans too, thereby reinforcing the imbalance in the local community as opposed to addressing it, as explained in more detail in Section 4 below.

Decision-Taking

- 3.63 Regrettably, the Council’s indifference to Key Workers in Plan-making extends to its decision-taking also. In particular, whilst Section 4 of the NPPF begins as follows, “Local planning authorities should approach decisions on proposed development in a positive and creative way”, the Council’s response to the Appeal Scheme has been characterised by both negativity and inconsistency.

Negativity

- 3.64 The Council's immediate response to an Appeal application for up to 330 discounted affordable homes for Key Workers and military personnel, was to ask the Appellant to consider changing the description to remove reference to Key Workers and military personnel (CD 4.41 [first email]).
- 3.65 In February 2022, the Council then sought to exclude Key Worker housing from the S106 Agreement for a scheme for Key Worker housing (CD 4.41 [second email]). When this attempt was rebuffed, the Council ceased all negotiations (CD 4.41 [third email]).
- 3.66 Even after the Council returned to the table in July 2022, its draft S106 Agreements continued to misrepresent the nature of the scheme by introducing tenures that would prevent allocation to essential local workers. Only following the Appellant's insistence that the S106 had to reflect the actual nature of the scheme, was a draft finally produced in September.
- 3.67 Also in February 2022, Spatial Planning (CD 4.49) and Housing (CD 4.48 [6.20.1]), provided their internal consultation responses to the Appeal application. Whilst both Officers made specific conclusions about housing, neither of them made any reference to the Key Workers AHNA (CD 1.1) submitted with the application documents.
- 3.68 In March 2022, the Council published its original Officer Report (CD 4.50). It, too, made no reference to the Key Workers ANHA, an assessment which was not even included in the list of Informatives (CD 4.50 [12, 2]). Given that the Key Workers AHNA was published alongside all the other application documents, was referenced frequently in the Planning Statement (CD 4.21), and was included in the list of Reports that should be read in conjunction with the Design & Access Statement (CD 4.7 [1.1]), there is no reasonable explanation for why three experienced Officers made no mention of it when expressing their opinion that the scheme should be opposed. Moreover, whilst the Key Workers AHNA received a mention in the final Officer Report (CD 4.48 [8.11.7]), neither Spatial Planning nor Housing updated or amended their original consultation responses.
- 3.69 What the Officer Report does demonstrate, however, is that:
- i. The Council gives more weight to schemes delivering far lower levels of affordable homes than the Appeal Scheme; and

- ii. Ranks Key Worker housing below other forms of affordable housing.

3.70 As explained below, however, neither approach is remotely supported by either national or local planning policy.

More Weight to Schemes Delivering Less Affordable Housing

3.71 The Officer Report states as follows in this regard (CD 4.48 [8.11.18]):

“It is considered that a mixture of general market housing and affordable rent, plus the proposed discounted Key Worker dwellings, would be more likely to lead to a mixed and balanced community as sought in policy.”

3.72 This approach in part explains how the Officer Report differentiated the Appeal Scheme from:

- i. The Planning Inspector’s decision to allow a residential scheme at Bullens Green Lane (CD 9.2), which delivered 55% market housing and 45% affordable housing (and no Key Worker housing); and
- ii. Its own decision to grant permission to a residential scheme off Harpenden Road (CD 9.3), which delivered 60% market housing and 40% affordable housing (and, again, no Key Worker housing).

3.73 However, the Council’s approach omits two critical matters:

- i. First, that the September GL Hearn LHNA demonstrates that 93% of the capped figure of 893 dpa is for affordable housing: not 40% or 45%, but close to the 100% delivered by the Appeal Scheme; and
- ii. Secondly, and so far as the comment in the Officer Report about *“a mixed and balanced community”* is concerned, as made clear in the definition in the DCA 2006 Housing Needs Study (CD 4.77.2), Key Workers *“... are essential for the balanced and sustainable development of the local community and local economy”*. Nurses, teachers, police

officers, fire fighters, local government officers and the like are, quintessentially, part of a balanced community, albeit joined by the single fact that, between, them they provide the local services upon which a properly balanced community in St Albans depends.

3.74 Even more importantly, by providing houses for these Key Workers, Addison Park redresses a fundamental imbalance currently afflicting St Albans. Put shortly, and as I come onto in more detail in Section 4 below, it is the Council's Plan-making and decision-taking that is worsening the imbalance in the local community by ignoring Key Workers; and Addison Park, on the other hand, will redress some of the harm caused by the Council's approach. In particular:

- i. The very wealthy can afford home ownership in St Albans;
- ii. However, because open market house prices are disproportionately high in St Albans, driven by demand and fuelled by decades of under-delivery of housing, most Key Workers cannot;
- iii. It is precisely to address such situations that:
 1. The NPPF singles out "essential local workers" in its definition of affordable housing (CD 7.1 [Glossary]); and
 2. It is also why the Government has also promoted its "First Homes" initiative:
- iv. However:
 1. Many Key Workers in St Albans are in households which earn too much to qualify for social rented housing under the Council's Housing Allocations Policy (CD 4.77.21); and
 2. The Government's "First Homes" Initiative has very limited reach in St Albans.

3.75 Hence, there is a critical need for schemes like the Appeal Scheme to fill the gap for Key Workers, and especially with regards to routes for affordable home ownership - which not only

falls full-square within the NPPF definition of “affordable housing” (CD 7.1, [Glossary]), but is what Key Workers actually want as Fordham Research and DCA have demonstrated (see paragraph 3.56 above). Sadly, however, and as explored immediately below, the Council have conspicuously failed to understand this, and have a preference for other types of affordable housing instead, ones which fail to meet Key Workers’ housing needs and will perpetuate the imbalance from which St Albans already suffers in these regards.

Council Preference for Other Types of Affordable Housing

3.76 The Council has no affordable housing policies for sites on the Green Belt outside the District’s settlements (CD 4.48 [8.11.16-8.11.17]). It also has no Local Plan policies in respect of the types of affordable housing needed or the mix. Despite this, the Council’s Strategic Housing Manager insists, in his consultation response on the Appeal application, that “the development is not policy compliant” because, amongst other things, it will not meet the demand for affordable rented properties (CD 4.48 [8.11.15]).

3.77 Given that there is no Local Plan policy to relevant effect, the Officer Report is only able to reference national policy and, specifically, paragraph 63 of the NPPF. However, this is entirely misplaced for the following two reasons:

- i. First, this paragraph of the NPPF deals with “Plan-making” rather than “decision-taking” and challenges Local Planning Authorities (not individual applicants) to establish policies that specify the type of affordable housing required. That is a challenge to which the Council has yet to rise, especially with regard to Key Worker housing; and
- ii. Secondly, even when a Council does have a policy specifying a required type or mix of affordable housing (unlike St Albans), such a policy does not prescribe the type or mix required on every application in any event. Rather, it is a District-wide target which affords flexibility to address needs differently in different cases – see the decision letter concerning the Granville Road Estate, NW2 2LD (CD 9.14, at [33]).

3.78 Further, whilst the Officer Report’s segue from paragraph 63 to the September 2020 GL Hearn LHNA (CD 4.48 [8.11.13-8.11.14]) may be meant to imply that the GL Hearn LHNA establishes policy, it does no such thing. A SHMA or LHNA is neither policy nor guidance; it is evidence.

Moreover, in the case of the 2020 LHNA, it is incomplete evidence because, like all the Council's Housing Needs Assessments, it excludes any measure of Key Worker housing.

3.79 Recent confirmation of the Council's preference for some types of affordable housing over others came in February 2023 when the Council adopted a new 5-year Council Plan 2023-28 (CD 4.77.22). However, and importantly, this is a political programme rather than any part of a Local Plan and does not create Development Plan policy. Moreover, whilst one of the Council's priorities stated in this 5-year political programme is to "deliver more social housing" (CD 4.77.22 [p.3]):

- i. There is no mention of Key Worker Housing, despite it being in the NPPF definition of "affordable housing" (CD 7.1, [Glossary]), and despite the inclusion of Key Worker Housing in the Council's Affordable Housing SPG (CD 8.17); and
- ii. Whilst the text confirms that "many local people find they cannot afford to buy or rent here" (CD 4.77.22 [p.3]), the priority to deliver more social rented housing will do nothing to address the needs of those who want to buy, such as the majority of Key Workers (see paragraphs 3.56 above).

Inconsistency

3.80 Furthermore, the Council's negative approach to the consideration of the Appeal Scheme is also evidenced by the inconsistent manner in which it applied the SKM GBR, which the Case Officer assured me was determinative in the Officers' recommendation to refuse (CD 4.40 [29]).

3.81 In particular, the Spatial Planning consultation response on the Appeal application (CD 4.48 [6.24.2] and CD 4.49), gave weight to the SKM GBR when concluding that the Appeal Site:

"... is indicatively proposed to be retained for landscaping and not for further consideration for release from the Green Belt through the Local Plan processes."

3.82 However, the Council's reliance on the SKM GBR is a clear contradiction of the public assurances given to the Local Plan's Examining Inspectors, and repeated elsewhere, as summarised in the

Planning Statement submitted in support of the Appeal application (CD 4.21 [8.5-8.7]). In particular, the above reliance on the SKM GBR is to be seen against the backdrop that:

- i. The Inspectors who examined the Council’s withdrawn Local Plan, Inspectors Crosby and Worthington, concluded that this Review was seriously flawed, as noted in paragraph 3.39 above.
- ii. The Council has (CD 4.77.23 [36-38]):
 - a. Acknowledged that all of the Broad Locations identified by SKM could be replaced if other strategic or smaller sites were identified in a subsequent Green Belt Review;
 - b. Assured the Examining Inspectors both that the Council would conduct a new Green Belt Review “to capture both additional strategic and smaller-scale parcels of land”; and
 - c. Assured the Examining Inspectors that the Council “would not seek to limit consideration of sites coming forward or their ability to add to or replace existing locations identified in the plan ...”.
- iii. In February 2021, after the emerging Local Plan had been formally withdrawn, the Head of Planning reminded Councillors on the Planning Policy Committee that the sites identified by the SKM Green Belt Review no longer carried weight (CD 4.1 [8.6]).
- iv. In December 2021, at an Inquiry into inappropriate development in the Green Belt at Burston Nurseries, Chiswell Green (CD 9.4), the Council’s position had changed from the previous appeal at the same site in 2019 and reliance was no longer placed on the fact that the site was not within one of the Broad Locations for development, in consequence of which in his decision letter dated 31st January 2022, Inspector Gilbert-Wooldridge stated as follows (CD 9.4 [13]):

“The development plan for the purposes of this appeal is the St Albans Local Plan Review 1994 (LP). The Draft ELP had been submitted for examination at the time of the previous appeal. It sought to allocate broad locations for development,

including for C2 units, and included a review of the Green Belt as part of the identification of such locations. The appeal site was not proposed for allocation. However, the examining Inspectors identified several concerns in April and September 2020 and the ELP was withdrawn from examination in late 2020. Work has begun on a new version of the ELP with initial public consultation expected during 2022. The parties agree that no weight can be attributed to the ELP in decision-making and I have no reason to disagree.”

3.83 And yet, despite all of the above assurances the Officer Report before the Committee insisted the SKM GBR could be relied upon because Planning Inspectors had relied on it at two Appeals (CD 4.48 [8.2.12-8.12.13]). That, however, was both mistaken and misleading In particular:

- i. The first of these was the appeal decision to allow a residential scheme at Bullens Green Lane (CD 9.2), in which the Inspector gave the SKM GBR short shrift, stating as follows (CD 9.2 [24]):

“... my attention has been drawn to a number of background evidence documents including Green Belt studies. These include a report prepared by SKM Consultants in 2013 which included an assessment of Green Belt in both WHBC, SADC and Dacorum Borough Council. ... [However], given the sheer size and scale of the land identified within the report when compared to the appeal site, I place only very limited correlation between the conclusions drawn here in relation to the function of the land or assessment of its function relative to the purposes of the Green Belt when compared to the appeal site...”;

- ii. The second was the Council’s own decision to grant permission to a residential scheme off Harpenden Road (CD 9.3) and did not even go to Appeal; and
- iii. Both of the two Decisions were made several months *before* the Council resiled from relying on the SKM Green Belt Review in the second Burston Nurseries Appeal (see paragraph 3.82 (iv) above).

3.84 Consequently, no weight should be given to the SKM GBR which, given the Council did not visit the Appeal Site until just a few weeks ago, on 17th February 2023, was the only evidence on which Spatial Planning based its consultation response in February 2022.

Conclusion on the Planning Crisis in St Albans

3.85 Planning in St Albans has been broken for years. Indeed, in November 2016, Birmingham-based Urbanissta Planning Limited chose St Albans' 2016 draft Local Plan as a Case Study for an online commentary on the Examination of Local Plans (CD 4.77.24), and, under the sub-heading "*St Albans is in chaos! Archaic plans, political challenges and excruciating progress*", they wrote:

"... not only do we wonder what the Authority has been doing for all those years, but more widely, we wonder how we (in Birmingham) manage to plan positively for the need of existing and our future generations", adding:

"Really, these issues are not hard to address technically by a suitably qualified planner ...".

3.86 Likewise, in November 2020 the Planning Consultant and blogger, Andrew Lainton, described the Council in the following terms (4.77.25):

"The most failed and slowest plan-making authority plans to improve – by going backwards 25 years, making the same mistakes, underestimating growth from adjoining authorities, downplaying the need for Green Belt sites Why is St Albans competing to retain the championship as most failed worst plan-making authority in the country?"

3.87 St Albans' persistent failure has not gone unnoticed by the Government either: in both 2017 and 2018 the Secretary of State wrote to the Council expressing the Government's concerns over the lack of progress on Plan-making and threatening intervention (CD 8.31 and CD 8.33, respectively). There has, however, been very little progress, as the withdrawal of the Local Plan 2020-2036, on 19th November 2020, amply demonstrates; as does the recent delay to the LDS for the emerging Plan.

3.88 When, in a Plan-led system, a Local Planning Authority proves itself incapable of leading on planning, it is not only inevitable but desirable for other parties to deliver at least some of the

homes its communities need. By its failure to produce a Local Plan, the Council is relying on others - whether that is through residents forcing it to produce an evidence base; Applicants promoting much-needed residential schemes; the Government choosing to intervene; or Planning Inspectors allowing Appeals, as was the Case with the Inspector's decision at Bullens Green Lane (CD 9.2)).

3.89 Moreover, whilst the Council's decision to take the lead of the Inspector at Bullens Green Lane when deciding to approve a residential scheme off Harpenden Road²⁸ (CD 9.3) might have led one to believe that the Council was finally willing to take seriously its planning and housing responsibilities, that has proved to be a false hope and a false dawn, as evidenced by its response to the Appeal Scheme (and, indeed, to its response to the Appeal Scheme co-joined to this Inquiry).

²⁸ Especially noting that the Council had hitherto resisted its development, including in the seminal case of *Hunston Properties Limited v (1) Secretary of State for Communities and Local Government and (2) St Albans City and District Council* [2013] EWCA Civ 1610 (CD 10.6) almost 10 years ago, but recently successfully defended its about-turn and decision to grant planning permission there in *R (Save St Albans Green Belt and Others) v (1) St Albans City and District Council and (2) Hunston Properties Limited* [2022] EWHC 2087 (Admin) (CD 10.7).

4 The Housing Reality Facing Key Workers in St Albans

4.1 As noted in paragraph 3.40 above, the Inspectors examining the Council's (subsequently withdrawn) Local Plan 2020-36 held the Stage 1 hearing session in January 2020, which was shortly before the UK went into its first Lockdown in the face of Covid Pandemic. Moreover, they wrote their highly critical letter with regard to that unlawful Plan on 14th April 2020, right in the middle of the period in which, at 8pm, each Thursday from 26th March 2020 until 28th May 2020, millions stood outside their homes to applaud the Key Workers who had put their lives on the line in the Covid Pandemic. At 8pm on Monday 17th October 2022, however, dozens of people applauded as a housing scheme for those same essential local workers was refused by the Council.

4.2 That decision was the consequence of the Council's unambitious approach to affordable housing; its indifference to Key Workers; and its inconsistent reliance on both flawed evidence and non-existent policy:

- i. In objecting to a scheme delivering 100% discounted affordable homes for Key Workers, the Council confirmed that it prefers the majority of homes on greenfield Green Belt sites to be open market homes, and it does so despite the fact that, unlike homes reserved exclusively for "essential local workers", open market homes can be bought by companies, private landlords, second-home owners, or people moving to the District from London or beyond.
- ii. Further, because the Housing Department wrongly believes that the Council has policies which require the majority of affordable homes to be rented, it objects to the provision of 100% home ownership affordable housing schemes on the basis that they are, allegedly, not "policy-compliant" (CD 4.48 [6.20.1]), seeking to ensure that the majority of affordable homes are social rent, when:
 - a. The Council have adopted no such planning policy; and
 - b. Even if most Key Workers want a social house (and, as Fordham Research and DCA demonstrated, the vast majority do not – see paragraph 3.56 above), many are excluded from the waiting list because they are in households which earn

too much to qualify under the Council's Housing Allocations Policy, December 2021 (CD 8.28).

4.3 For example:

- i. The average salary for a nurse is £37,000²⁹, which exceeds the Council's maximum Gross Household Income Limit for a 1-bedroom house (see Fig. 4 below); and
- ii. If he or she is in a household with someone earning the average St Albans' salary of £39,500³⁰, the household income of £76,500 exceeds the Council's maximum Gross Household Income Limit (for a 2-, 3- or even a 4-bedroom house (see Fig. 4 below).

The Gross Household Income Limits are:

1 Bed Property	£36,295
2 Bed Property	£48,173
3 Bed Property	£56,152
4 Bed Property	£69,608

Fig. 4 Extract from the Council's Housing Allocations Policy, Feb 2021 (CD 8.28 [p.34]).

4.4 However, whilst being excluded from social rented housing in St Albans, neither could such a household afford to purchase an open market family home in St Albans. Noting that the majority of first-time buyers are couples³¹, Table 1 below demonstrates, using four 'high street' mortgage affordability calculators, the household income for our typical Key Worker household would support a mortgage of c.£340,000-£360,000, but the median price for a house in St Albans, is £590,000³².

²⁹ Reuben, A. and Gilder, L. BBC News Reality Check 22.12.22.

³⁰ October 2022 source: www.plumplot.co.uk/St-Albans-salary-and-unemployment.

³¹ English Housing Survey 2021-22

³² ONS House Price Statistics for Small Areas, Dataset 9, Table 2a

Lender	Income 1	Income 2	Possible Mortgage
Halifax	£39,500	£37,000	£363,375
HSBC	£39,500	£37,000	£363,375
Santander	£39,500	£37,000	£340,425

Table 1. Mortgage available to household comprising nurse on average salary and other on an average salary for St Albans. Source: online calculators, March 2023. Assumptions: 2 people, first-time buyers, still saving for deposit.

4.5 Accordingly, whilst the wealthy do not need assistance, and the Council rightly provides help to the poorest and/or most vulnerable, many Key Worker households have been allowed to fall between two stools as a direct consequence of St Albans Council’s indifference to them.

4.6 And there is no sign that anything will change. As set out above:

- i. The September 2020 GL Hearn LHNA “informing” the emerging Local Plan does not measure the housing need of Key Workers;
- ii. In September last year, the LPAG abandoned its fleeting interest in the subject;
- iii. Despite its official responsibilities, the Housing and Inclusion Committee insists the matter of affordable housing for Key Workers has nothing to do with them; and
- iv. The new 5-year Council Plan ignores Key Workers, too.

4.7 In the meantime, if a nurse, midwife, or paramedic working in the NHS, or a police officer, fire fighter, care worker or teacher – on a good salary and, so, ineligible for social housing, but unable to buy a home locally – visits the Council’s website, the advice includes the following: *leave for somewhere cheaper* (see Fig. 5 below):

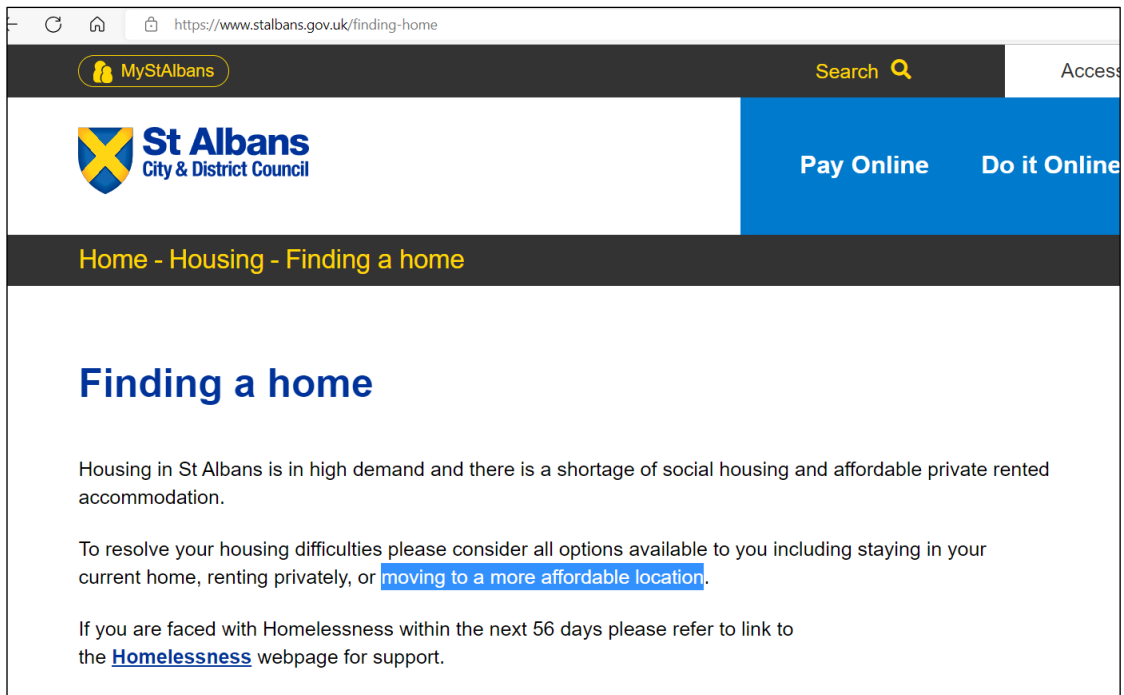


Fig. 5 The “Finding a home” page from the Council’s website (my highlighting).

- 4.8 All the while, the Council’s focus on affordable rental housing - secured through the granting of permission for market houses that deliver affordable houses via developer contributions within a split comprising 60% open market housing and 40% affordable rented housing - will make matters worse. It will generate more pressure on local health, education, and care services, whilst the Key Workers who cannot afford market houses, but do not qualify for the social housing, are encouraged by the Council to move elsewhere.

5 Addison Park – A Viable Model to Create a More Balanced Community in St Albans

- 5.1 In November 2020, during the second Covid-19 lockdown, I was introduced to Mr Steve Collins by a mutual friend. Mr Collins expressed his wish to do something positive for some of the Key Workers (including military personnel) on whom we all depend.
- 5.2 Inspired by the “Homes fit for Heroes” campaign following the First World War, Addison Park’s mission is to deliver “Local Homes for Local Heroes”. In line with both the aspirations expressed by Key Workers in the studies by Fordham Research and DCA (see paragraph 3.56 above, these will be “home ownership affordable houses”, which would “provide a subsidised route to homes ownership ... for essential local workers” as advocated by the NPPF (CD 7.1 [Glossary]).
- 5.3 As noted in Section 3 above, there is a serious and worsening issue of housing affordability in St Albans, as more fully covered in the Proof of Evidence of Annie Gingell. For some 330 Key Worker households, Addison Park will help bridge the gap between what is available through social rented housing and what is affordable to buy.
- 5.4 The PPG states that “a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes”³³. Whilst Addison Park delivers its affordable housing as the essence of this unique scheme rather than as “developer contributions”, 25% of the new dwellings will be First Homes guaranteed via the Section 106 Agreement. Furthermore, the one-third discount exceeds the minimum 30% discount required by the PPG.
- 5.5 The PPG also emphasises that:

“First Homes are designed to allow people to get on the housing ladder in their local area, and in particular to ensure that key workers providing essential services are able to buy homes in the areas where they work.”³⁴

- 5.6 The PPG sets caps on the sale price of First Homes. Because of the very high houses prices in the Capital, the cap for London is £420,000, equivalent of an open market value of up to £600,000 (£600,000 x 0.7 = £420,000). However, whilst house prices in St Albans are similar to

³³ Paragraph: 012 Reference ID: 70-012-20210524

³⁴ Paragraph: 008 Reference ID: 70-008-20210524

those in large parts of London³⁵, the upper income threshold for eligibility is lower: £250,000, equivalent to an open market value of up to £356,000 ($£356,000 \times 0.7 = £249,200$). Consequently, essential local workers in St Albans have considerably less choice on First Homes than in London – both because the price cap is lower and also because they do not receive London weighting in their salaries either - even though house prices are as high as in large parts of London. (Notably, if the London cap applied in St Albans, all the houses at Addison Park could be discounted to qualify as First Homes - the median price of 3-bedroom home in the District is currently £675,000³⁶, which would require a 38% discount ($£675,000 \times 0.62 = £418,500$).

5.7 To qualify as affordable housing, First Homes and Discounted Market Sales Housing must be discounted by at least 30% and 20%, respectively, but Shared Ownership housing is not subject to a specific discount. However, because of Mr Collins' insistence on providing something genuinely affordable in the context of house prices in St Albans, all the houses at Addison Park, including Shared Ownership, will be discounted by at least a third.

5.8 This is made possible at Addison Park because the Appeal Scheme does not follow the traditional business model whereby an owner sells land to a national housebuilder who builds the houses and recoups its costs by selling the majority of them at the open market price. In doing so, the national housebuilder must pay for the land, pay for the build, make S106 contributions, and also make a profit (typically 15-20%³⁷), all of which costs (including the cost of the land they purchased), will be reflected in the ultimate sale price of the dwellings.

5.9 However, because Headlands Way Limited already owns the land and is willing to commission the build of the houses itself, it has no need to include the land costs in the ultimate sale price. And it is that simple model, whereby the landowner itself acts as the developer, which enables the landowner to discount the house prices by at least a third against the traditional housebuilders' prices, without threatening the scheme's viability, even allowing for S106 contributions.

³⁵ "The commuter town where homes are as unaffordable as Chelsea" Gifford, C. The Daily Telegraph, 22nd June 2022

³⁶ Current House Prices in St Albans, Home.co.uk, March 2023

³⁷ Paragraph: 018 Reference ID: 10-018-20190509 of the PPG advises as follows with regard to the profit range to be taken into account in a Viability Assessment: "... 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies."

5.10 Through so doing, Addison Park will “help local communities” by redressing some of the imbalance caused by the Council’s flawed agenda, and it will do so by building the right homes for the right people in the right place:

- i. The “right homes” for the “right people” are those which support a balanced and sustainable community. The definition of Key Workers in the Council’s 2006 Housing Need Study (CD 4.77.2) regards them as “essential for the balanced and sustainable development of the local community and local economy”. By definition, therefore, homes for essential workers are “the right homes” for “the right people”.
- ii. As for the “right place” to house essential local workers, again by definition that must be “locally”.

5.11 These are wholly uncontroversial conclusions that have been drawn by others – see, for example: *“Key Issues for Key Workers - affordable housing in London”*, Greater London Authority, February 2001 (4.77.26 [3.8]):

“Another important strand in the vision relates to the benefits of maintaining key workers in the local community. This was not just about ensuring that those working shifts or unsocial hours could live near their work but focused on the wider benefits of ensuring balanced communities and the long-term maintenance of mixed neighbourhoods.”

5.12 Furthermore, whilst St Albans Council ignores the profound benefits of providing affordable houses for Key Workers within its District, other Local Planning Authorities have proved to be more enlightened and more receptive to the Government’s entreaties to meet the affordable housing needs Key Workers. The London Borough of Barnet (“LB Barnet”) has, for example, only recently shown itself to be far more enlightened, as has the High Court in upholding its decision to do so:

- i. Having already considered the issue formally in 2017 (CD 4.77.27), via the sort of exercise the LPAG promised to do but did not (see paragraph 3.48 above), LB Barnet received an application for up to 130 dwellings at Finchley Memorial Hospital, all of which would be affordable housing for NHS staff/healthcare workers.

- ii. When faced with that atypical scheme to deliver affordable homes exclusively for Key Workers, the Local Planning Authority applied the “positive and creative” approach to decision-making required by the NPPF (CD 7.1 [38]), and, after acknowledging that the specific nature of the proposed development did not fit into the traditional model of affordable housing and would be solely aimed at accommodating NHS staff with no element of open market housing, the Officer Report recommended permission be granted concluding as follows (CD 4.77.28 [5.26]):

“And in weighing the benefits, officers have taken into account the exceptional circumstances associated with the need to ensure the health service is able to retain staff to ensure adequate healthcare in the local area.”

- iii. The Committee resolved to grant planning permission pursuant to that recommendation.
- ii. The LB Barnet decision to grant was thereafter subject to a Judicial Review, which was dismissed in November 2022 (CD 10.5).

5.13 The schemes at Finchley Memorial Hospital and Addison Park are, clearly, very similar: they both comprise 100% affordable housing for Key Workers. The approaches taken by the respective Councils, however, could not be more different:

- i. Even though the scheme in Finchley failed precisely to accord with its affordable housing policies, the Local Planning Authority was positive and creative in acknowledging “the exceptional circumstances associated with the need to ensure the health service is able to retain staff to ensure adequate healthcare in the local area ...”;
- ii. St Albans Council, however, despite not having any applicable affordable housing policies, was negative and inflexible because it regards Key Worker housing to be the least valuable form of affordable housing.

6 Conclusion

6.1 St Albans Council's decision to define Key Workers in its 2004 Affordable Housing SPG was deliberate and welcome. The Council's decision not to measure the housing needs of Key Workers is also deliberate but inexplicable.

6.2 The Council has been, and remains, entirely indifferent to the affordable housing needs of the most valuable workers in the community, and this is so despite:

- i. Being fully aware that there was a growing issue with the affordability of and access to housing for Key Workers;
- ii. The Government introducing various programmes to promote home ownership for Key Workers;
- iii. The East of England Plan encouraging Local Planning Authorities to increase their affordable housing targets in response to widening ratio of house prices to incomes;
- iv. The relentless increase in mean house price to incomes ratio in St Albans, still the highest in the East of England;
- v. The explicit identification of "essential local workers" in the NPPF definition of affordable housing;
- vi. Individual landowners proactively including small numbers of Key Workers in their proposals; and
- vii. The Council's latest Affordable Housing Needs Assessment being written during the Covid Pandemic.

6.3 Indeed, even after it received the unique appeal Application to deliver 330 significantly discounted affordable homes for Key Workers, the Council has:

- i. Sought to remove any reference to Key Workers from the scheme's description;

- ii. Attempted to exclude Key Worker housing from the Section 106;
- iii. Dabbled with the idea of assessing Key Worker housing, only to drop it;
- iv. Denied that the issue of affordable housing for essential local workers has anything to do with its Housing and Inclusion Committee; and
- v. Published a 5-year Council Plan which prioritises social rented housing for which most Key Worker households do not qualify.

6.4 The Planning Crisis in St Albans has real-world consequences. The Council's ineffective and unambitious Plan-making, and its negative and inconsistent decision-taking, have serious implications for essential local workers. In a District with some of the highest house prices in England, their housing needs go unmeasured and unmet. Given the fact local people rely on the services provided by these Key Workers, the Council's approach is inexplicable at any time: in the wake of the Covid Pandemic, it is unforgivable.

6.5 In the meantime, it is only through allowing, on Appeal and upon the basis of Very Special Circumstances, new housing such as proposed by the Appeal Scheme, that there is any hope of beginning to meet the unmet housing needs in St Albans, both generally and in terms of critically needed affordable housing also, and especially for Key Workers.