

HALLAM LAND MANAGEMENT LIMITED
ST ALBANS SCHOOL
ST ALBANS SCHOOL WOOLLAM TRUST

Woollam Park

Affordable Housing Statement

February 2025



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1 Introduction

- 1.1 Hallam Land Management Limited and St Albans School have submitted an outline planning application for a mixed use development at Woollam Park, North St Albans.
- 1.2 The submitted application seeks planning permission for the following development:
 - (1) Relocation and replacement of existing playing fields and erection of pavilion annex; and
 - (2) Construction of up to 1000 new homes (Use Class C3) to include a mix of market housing, affordable housing, age restricted specialist accommodation for the elderly, adult disability service units; a care home (Use Class C2); a local centre (Use Classes E and F); a primary school (Use Class F); the laying out of green infrastructure including habitat creation; drainage infrastructure; earthworks; pedestrian and cycle routes; new means of access and alterations to existing accesses.
- 1.3 The application is submitted as a “hybrid” application. Part (1) is submitted as a full application. Part (2) is submitted as an outline application with approval of means of access sought at the present time, and all other reserved matters to be approved at a later date.
- 1.4 As part of the proposed development, new affordable housing is to be provided. This reflects both existing and emerging local plan policy and national planning policy.
- 1.5 This statement provides an overarching explanation of the affordable housing element of the scheme, the framework provided by relevant tiers of planning policy, and the scheme’s compatibility with development plan policies and guidance. It is structured as follows:

Section 2 provides contextual information;

Section 3 explains Local Plan Policies relevant to affordable housing;

Section 4 describes the applicants’ approach to the provision of affordable housing; and

Section 5 provides a summary.

2 Contextual Information

- 2.1 A long-established planning principle is that a community's need for affordable housing is a material planning consideration which may properly be taken into account in deciding planning applications.

National planning policy

- 2.2 The National Planning Policy Framework ("NPPF") was first published in 2012 but has more recently been revised in 2023. It is acknowledged that the Ministry of Housing, Communities and Local Government have recently consulted on the NPPF in its current form, with there being an opportunity to comment on the potential revisions between July and September 2024. The 2023 version of the NPPF remains the adopted national planning policy document and is therefore relevant and pertinent to this application at the time of writing. Should this evolve and the revisions proposed progress during the course of this planning application process then the scheme will be reviewed in the context of the new NPPF.

- 2.3 Paragraphs 7 to 10 deal with the purpose of the planning system as a means of achieving sustainable development. Paragraph 8 identifies the three dimensions of sustainable development namely social, economic and environmental which are interdependent and need to be pursued in mutually supportive ways. The social dimension is described in the following terms:

"to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being."

- 2.4 Paragraph 60 confirms that the Government's objective is to significantly boost the supply of homes. To achieve this, it is important that the needs of groups with specific housing requirements are addressed.

- 2.5 Paragraph 63 states that:

"...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes, people wishing to commission or build their own homes"

- 2.6 Paragraph 64 states that:

"Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required³⁰, and expect it to be met on-site unless: a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and b) the agreed approach contributes to the objective of creating mixed and balanced communities"

- 2.7 Paragraph 65 states that:

"Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:

a) provides solely for Build to Rent homes;

b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);

c) is proposed to be developed by people who wish to build or commission their own homes; or

d) is exclusively for affordable housing, a community-led development exception site or a rural exception site.”. (Certain other exemptions are also listed)

2.8 The Government’s definition of affordable housing constitutes the following:

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); and which complies with one or more of the following definitions:

Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

Discounted market sales housing: s that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

2.9 Due to the new Labour government and as mentioned above, the NPPF will undergo significant revisions in the autumn of 2024, with a strong emphasis on affordable housing. The updated NPPF will mandate that local plans specify a minimum proportion of social rent homes and ensure that the mix of affordable housing meets local needs. Additionally, for major developments, policies will require that at least 10% of the total homes be affordable home ownership options. These changes aim to address the acute housing crisis by increasing the availability of affordable housing and supporting sustainable community growth.

Local housing need

2.10 The NPPF requires that the Government’s Standard Method for calculating local housing need is the starting point for determining the minimum number of needed in a local authority area. The Standard Method takes account of household forecasts and affordability ratios. Applying that methodology to St Albans gives rise to a need for some 900 new homes to be built each year.

2.11 The District Council has not been able to achieve this requirement; for successive years it has not been able to demonstrate the necessary number of years supply and has not met the housing delivery test. In overall terms, reflecting government policy, there is a need to significantly boost the supply of market and affordable housing in St Albans

Local Housing Needs Assessment

- 2.12 In 2020, the South West Hertfordshire local authorities¹ commissioned GL Hearn to prepare a Local Housing Needs Assessment (“LHNA”). This followed an earlier similar assessment in 2016.
- 2.13 The purpose of the LHNA was to assess future development needs for housing across South West Hertfordshire over the 2020-2036 period. This, in turn, informs strategic and local planning activities.
- 2.14 In particular, it considered the need for different types of housing, and the housing needs of different groups within the South West Hertfordshire Housing Market Area (“HMA”) and constituent authorities.
- 2.15 Within this context, there exists an established, indeed acute need, for affordable housing in St. Albans, as evidenced below.

Estimates of affordable housing need

- 2.16 The analysis presented by GL Hearn in the Local Housing Needs Assessment estimates that, for St Albans, 443 households will need affordable housing to rent per annum between 2020 and 2036. (Table 37 refers).
- 2.17 In addition, GL Hearn estimate a net need for 365 units of affordable home ownership per annum between 2020 and 2036. (Table 42 refers). Table 1 reproduces those estimates of affordable housing need.

	Estimated Level of Rented Affordable Housing Need from Newly Forming Households (per annum 2020-2036)	Estimated Annual Need for Affordable Home Ownership (2020-2036)
Dacorum	363	248
Hertsmere	356	147
St Albans	443	385
Three Rivers	350	162
Watford	482	252
SW Herts	1994	1194

Table 1: Estimated level of affordable housing need – South west Hertfordshire

Local Housing Needs Assessment Update

- 2.18 More recently, a Local Housing Needs Assessment Update was published in March 2024. This document does not provide any significantly different findings to the 2020 work. It demonstrates that there remains a need for rented affordable housing in the District.
- 2.19 In the four year period between Assessment work, the need for rented affordable accommodation, whilst the affordable home ownership need has decreased to 353.

Affordable housing completions

- 2.20 It is instructive to consider, in the context of the estimates of affordable housing need, the extent to which those needs have been or will be met.
- 2.21 The District Council’s published annual monitoring reports reveal the number of new affordable homes built in successive years. This reproduced at Appendix 1 with summary information set out below. Table 2 reproduces that data.

¹ Dacorum Borough Council, Hertsmere Borough Council, St. Albans City and District Council, Three Rivers District Council, and Watford Borough

Monitoring year	Total Completions	Affordable Home Completions
Total 1994/95 – 2021/22	11,046	2033
Average per year (long term)	395	73
Total 2017/18 – 2021/22	2276	459
Average per year (short term)	455	92

Table 2: Affordable housing completions 1994/95 – 2021/22

- 2.22 It is readily apparent that the number of affordable homes built over this period is a very small proportion of the total number of completions; representing less than 20%. In very few years was the 1994 Local Plan’s target of 200 new affordable homes each year² and hence the persistent under-supply of affordable homes has contributed to affordability issues.
- 2.23 When compared to current indicators of the number of new homes to be built, a step change is required to ensure that the estimated number of affordable homes in the District is achieved.

Market signals

- 2.24 Figure 1 overleaf illustrate the change in affordability in St Albans over 20 years; affordability has worsened over this time, and at a rate greater than experience in Hertfordshire and England & Wales.
- 2.25 Whilst the affordability ratio fell in 2023, that does not diminish to any extent the long term trend and the fact that over 20 years the affordability ratio in St Albans has increased from 10.52 to 17.61.
- 2.26 In 2023, St Albans was the 4th least affordable local authority area in England and Wales; only the London Boroughs of Richmond-upon-Thames, Westminster and Chelsea and Kensington have higher affordability ratios.

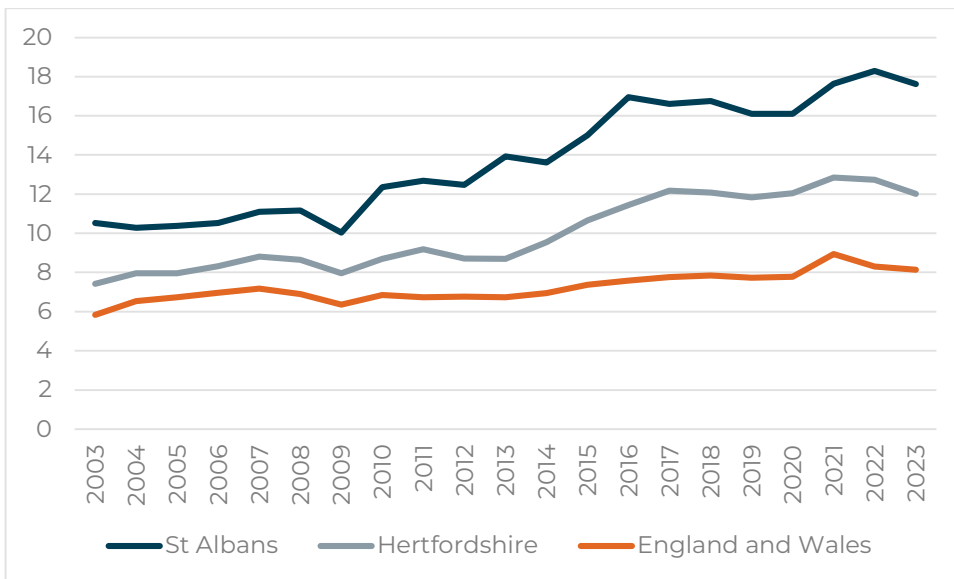


Figure 1: Median house price – median income ratio 2003-2023

- 2.27 GL Hearn refer to the lower quartile house price to income ratio being above the national averages in all five South West Hertfordshire local authorities revealing significant affordability pressures across the HMA (paragraph 4.11 refers). Similarly, the median rental prices in the HMA are significantly above all the comparators including the general Consumer Price Index (CPI) and the Housing CPI. (paragraph 4.34 refers)

² Policy 7A, see paragraph 3.2

2.28 As GL Hearn identify, “St. Albans has constantly experienced affordability pressures” for what is now almost two decades.

2.29 Reflecting this, the supporting text to the emerging District Local Plan stated:

“The District’s house prices are amongst the highest not only in Hertfordshire, but across the whole country. As a result local people on lower-level incomes, especially younger people and key workers, often find themselves priced out of the market, and there is clearly a high need for affordable housing. This is also reflected by the number of people on the Council Housing Register.”

The importance of providing of affordable housing

2.30 Of particular note in this regard are the conclusions drawn recently by the Inspector appointed to consider the Chiswell Green appeals:

“The Council further accepts that there is an acute need for affordable housing. The most recent Local Housing Needs Assessment (2020) identified a need for 13,248 affordable dwellings during the period of 2020-2036, equivalent to 828 per annum. Since the beginning of that period, a shortfall of 1,428 affordable dwellings has arisen. The Council’s estimated supply of affordable housing up to 2027 is just 39 dwellings per annum. This position follows years of under delivery, a substantial shortfall having accumulated against the requirement identified in the earlier Strategic Housing Market Assessment (2016)”. (IR586)

2.31 For Appeal A in that instance, which is equivalent to the Woollam Park proposals that intend to provide 40% affordable housing, the Inspector formed the following view:

“Appeal A would deliver up to 391 dwellings, 40% of which would be affordable housing (up to 156 units). A small proportion would also be self-build/custom housing plots. The scheme would make sizeable contributions towards the identified needs, and I attach very substantial weight to the proposed housing.” (IR589)

2.32 Having considered the Inspector’s Report, the Secretary of State drew the following conclusions in his Decision Letter:

“The Secretary of State agrees with the Inspector that there is a very substantial need for housing in the district which is persistently going unmet, that the Local Plan housing requirement is hopelessly out of date, and that, using the standard method, the Council can demonstrate just a two-year housing land supply at best. He also notes that the latest HDT has been failed by some margin. Therefore, the presumption in favour of sustainable development is triggered, in accordance with footnote 8 to paragraph 11(d) of the Framework.” (para 28)

“For the reasons given in IR586-591, the Secretary of State agrees with the Inspector that in the context of such a great housing need, very substantial weight should be attached to the proposed housing. (para 29)

2.33 In terms of affordable housing provision, the proposed development at Woollam Park is discernible in one important respect. Because it is of a larger scale, it will provide a greater number of affordable homes – up to 400 – which will provide a surety of supply over a longer period of time.

3 Local Plan policies

3.1 In this section, the local planning policies concerning affordable housing are discussed.

St Albans City and District Local Plan Review

3.2 The extant St Albans Local Plan was adopted in 1994.

3.3 Even at the time of its inception, there was an acknowledged paucity of affordable housing being provided; highlighting what is termed a “*clear indication*” that there is a lack of affordable housing in the St Albans District (paragraph 3.34 refers).

3.4 Policy 7A identifies a target of at least 200 affordable homes through new house building and conversions. In this context, the Council's policy is to negotiate an element of affordable housing on sites of over 0.4ha and on sites of under this size where 15 or more dwellings are proposed.

3.5 Regardless of its aged nature, the principle of seeking an element of affordable housing continues to apply to the proposed development.

3.6 The continued demonstrable and indeed heightened need for affordable housing is evident from Section 2.

3.7 The application site is situated adjacent to the District's main town which, pursuant to Policy 2, represents the main focus for new development and the largest concentration of population facilities and services. In locational terms, the application site is wholly suitable to provide affordable housing and meets the location criteria Policy 7A(i).

3.8 For these reasons, it follows that Policy 7A is a relevant development plan policy.

3.9 In this regard, it is notable that the District Council has sought and secured 40% affordable housing on a number of sites granted planning permission.³ This reflects up to date evidence and emerging planning policy.

Emerging Local Plan

3.10 Whilst not part of the development plan, Policy HOU2 of the emerging Local Plan⁴ states that the Council will seek to meet the District's affordable housing needs by requiring new development on applicable sites to provide 40% of homes on-site as affordable housing.

3.11 On this basis **the applicants propose that 40% of the number homes provided are provided as affordable homes.**

3.12 In the following section, the approach to the provision of affordable housing is discussed.

³ List: Bullens Green, Harperden Road, Chiswell Green

⁴ Regulation 18 consultation document September 2023

4 The approach to the provision of affordable housing

- 4.1 In the event outline planning permission is granted, the Applicants propose that, a planning obligation in the accompanying Section 106 Agreement shall require an Affordable Housing Scheme for each main phase of the development to be submitted to the Local Planning Authority for approval.
- 4.2 The Affordable Housing Scheme shall include details of:
- (i) the numbers, type, tenure and location of the Affordable Housing;
 - (ii) the timing of the construction of the Affordable Housing and its phasing in relation to the occupancy of market housing units;
 - (iii) arrangements for the transfer of the affordable housing to a Registered Provider;
 - (iv) the arrangements to ensure that such provision is affordable for both first and subsequent occupiers;
 - (v) the occupancy criteria to be used for determining the identity of the occupiers of the affordable housing; and
 - (vi) the affordable housing plan.
- 4.3 Table 3 below establishes the parameters that shall be included within the Section 106 Agreement to guide the individual Affordable Housing Schemes.

WOOLLAM PARK PROPOSALS	
Proportions	The Affordable Housing Schemes will ensure that 40% of the new homes overall will be provided as affordable housing. This equates to up to 400 new homes, and will include the four adult disability service units and the age restricted specialist accommodation for the elderly, and accords with Policy 7A of the 1994 Local Plan and Policy HOU2 of the emerging Local Plan.
Tenure split	Each Affordable Housing Scheme will specify a tenure mix for the main phase broadly in accordance with the tenure mix set out in Policy HOU2 of the emerging Local Plan: 30% social rented, 30% affordable rented and 40% affordable home ownership, which includes 25% of all affordable housing as First Homes is proposed.
Mix	Each Affordable Housing Scheme will specify the mix by size and tenure for that main phase and will broadly accord with that set out in Policy HOU1 of the emerging Local Plan.
Integration	A design approach will be pursued where affordable housing is indistinguishable in appearance from market housing and distributed evenly across the site. The Affordable Housing Schemes will specify that affordable housing will generally be clustered in groups of no more than 15 homes.

Table 3: Parameters to be secured in planning obligation to guide affordable housing schemes.

- 4.4 A component part of the proposed development is age restricted specialist housing for elderly persons. This reflects the ageing nature of the population. The applicant is aware that the County Council consider that extra care accommodation is required to meet an identified need and that this would comprise a part of the overall provision of affordable housing. Whereas, the District Council wish to prioritise family housing to meet the priority need. The type and tenure of affordable housing will need to be defined in a planning obligation in due course. In the event the

extra care accommodation is not part of the 40% affordable housing, the land use parameter plan has sufficient flexibility to enable this to be brought forward as retirement housing.

5 Conclusions

- 5.1 This Affordable Housing Statement accompanies an outline planning application submitted by Hallam Land Management Limited and St Albans School for development at Woollam Park, North St Albans. North St Albans is identified in the District Council's emerging Local Plan as one of its Broad Locations to meet the identified need for new housing.
- 5.2 A long-established planning principle is that a community's need for affordable housing is a material planning consideration which may properly be taken into account in deciding planning applications.
- 5.3 There is a significant need for affordable housing in the District and in the circumstances that exist, the provision of affordable housing has attracted very substantial weight in determining planning applications.
- 5.4 Policy 7A of the 1994 Local Plan establishes the principle that the District Council will seek to negotiate the provision of affordable housing on qualifying sites. The application meets the criteria set out therein.
- 5.5 Whilst in 1994 the need for affordable housing was plainly evident, by the present time, that need is greater still. Present day evidence suggests an identified need for 13,248 affordable dwellings during the period of 2020-2036, equivalent to 828 per annum. Even with recent planning permissions having been granted, the level of future supply of affordable housing falls a long way short this.
- 5.6 Policy HOU2 of the emerging Local Plan takes account of this latest assessment of affordable housing need and proposes that, on sites such as Woollam Park, 40% of new homes are provided as affordable homes.
- 5.7 **In this context, the applicants propose that 40% of the number homes provided are provided as affordable homes.**
- 5.8 The provision of a materially important supply of affordable homes is a positive benefit of the proposed development. Consistent with other instances in the District, this should attract very substantial weight in the planning balance.
- 5.9 The Applicants propose that, in the event outline planning permission is granted, a planning obligation in the accompanying Section 106 Agreement shall require an Affordable Housing Scheme for each main phase to be submitted for approval by the LPA. Such a scheme will specify, *inter alia*, the proportion of affordable housing, the tenure and size of the affordable homes, the design and integration across the development as a whole.

Appendix 1. Affordable Housing Completions

Monitoring year	Total Completions	Affordable Home Completions
1994/95	418	96
1995/96	474	170
1996/97	238	57
1997/98	415	-6
1998/99	529	124
1999/2000	600	25
2000/01	415	30
2001/02	356	64
2002/03	301	45
2003/04	248	7
2004/05	601	243
2005/06	329	28
2006/07	377	10
2007/08	293	36
2008/09	398	92
2009/10	272	129
2010/11	382	115
2011/12	380	20
2012/13	320	105
2013/14	375	-42
2014/15	313	70
2015/16	396	97
2016/17	340	59
2017/18	385	106
2018/19	624	82
2019/20	437	31
2020/21	516	169
2021/22	314	71
2022/23	401	68
Total 1994/95 – 2022/23	11,447	2101
Average per year	394.7	72.45
Total 2017/18 – 2022/23	2677	527
Average per year (short term)	446.2	105.4

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