

Affordable Housing Statement

Bricket Lodge Sports and Country Club and Paintball Site, Lye Lane, St Albans AL2 3TF



The demolition of existing buildings, the construction of up to 115 dwellings, the creation of a new access and associated highways improvements.

Outline Planning Application with Access Sought

The demolition of existing buildings, the construction of up to 115 dwellings, the creation a new access and associated highways improvements.

On behalf of Mr Ken Rudkin, J K Rudkin Builders Ltd

Ref: KR/BL/ahs

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Personal Statement

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

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1 Introduction

- 1.1 This Affordable Housing Statement is submitted as part of an Outline Planning Application for up to 115 dwellings at the Bricket Lodge Sports and Country Club and Paintball Site, Lye Lane, Bricket Wood, St Albans. It is submitted in accordance with the Council's Local Requirements as the scheme comprises 15 dwellings or more.
- 1.2 The Statement considers the affordable housing provided by the scheme in the context of national and local policy.
- 1.3 The Indicative Proposed Site Layout, Planning Statement and Design and Access Statement submitted with the application, set out an indicative mix of 109 dwellings. The final quantum and mix will be subject to discussion with the Council and others prior to the Reserved Matters Application, hence the flexibility to deliver "up to" 115 dwellings.

2 Planning Policy Context

National policy context

- 2.1 The National Planning Policy Framework, July 2021 ("the NPPF") sets out the Government's policy on housing, with affordable housing an essential component.
- 2.2 Paragraph 60 states:
"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."
- 2.3 Paragraph 62 states:
"... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies ..."
- 2.4 Paragraph 63 states:
"Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required²⁹ ..."
– footnote 29 references Annex 2 of the Glossary

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

2.6 Those definitions include: Starter Homes, Discounted Market Sales Housing and Other affordable routes to home ownership (including shared ownership, relevant equity loans, other low-cost homes for and rent to buy). A quarter of affordable housing contributions are now required to be First Homes, the Government's preferred type of discounted market sales housing.

Local policy context

2.7 There is no affordable housing policy for large sites in the Green Belt in the current Development Plan. This was confirmed at a meeting of the Planning Referrals Committee on 26th July 2021, when Officers publicly explained that Policy 8 "Affordable Housing in the Green Belt" is a rural exceptions policy restricted to specific villages "washed over by the Green Belt" and so doesn't apply to major sites in the Green Belt.

2.8 In addition, there is no Local Policy which seeks to rank or prefer one type of affordable housing over another. This is not unusual. I note that in allowing an Appeal for a scheme for 100% affordable housing, Inspector Paul Griffiths rejected the London Borough of Ealing's objections to the mix of affordable homes being delivered, stating:

"There is no provision in local or national policy or guidance that justifies ranking one form of affordable housing need over another. Indeed, Planning Practice Guidance makes clear that all households whose needs are not met by the market and who are eligible for one or more of the types of affordable housing specified in the Glossary to the Framework are in affordable housing need."¹

2.9 The Council's 2004 Affordable Housing Supplementary Planning Guidance ("the SPG") purports to set an affordable housing contribution target of 35% on large sites in the Green Belt. However, an SPG or SPD isn't Policy and cannot create Policy.

3 Affordable Housing Proposal

3.1 Despite the absence of an applicable affordable housing policy, the Applicant believes it is right to deliver affordable homes so that this proposal promotes social cohesion and plays a proportionate role in addressing the urgent need in the District. Consequently, 35% of the new homes on the Site will be affordable. This is the percentage sought by the Council's 2004 Guidance and the ratio considered acceptable at Appeal by the Inspector who Allowed a major housing scheme at Oaklands College (Ref: 5/2013/2589) and by the Council when approving the proposal at Beaumont School (Ref: 5/2014/0940).

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

3.2 As set out above, 25% of affordable houses on the Site will be First Homes. The size of those houses and the mix of the rest of the affordable housing (i.e. tenure types and houses sizes), together with the priority for allocation (for example, whether people with connections with Bricket Wood should have priority ahead of the rest of St Stephens Parish and finally the rest of the District), is expected to be subject to discussion with the Parish and District Councils as part of the Section 106 agreement and Reserved Matters Application.

3.3 It is envisaged that the affordable housing will be delivered and managed by a Housing Association, Local Planning Authority or other competent authority or a combination of the above. Precise details to be agreed ahead of the Reserved Matters Application.

4 Conclusion

4.1 Despite the absence of an affordable housing policy in the Green Belt outside the District's small villages, 35% of the new dwellings on this Site (up to 40 units), will be affordable homes.

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September 2022