

MEMORANDUM

To: Alex Howard
Senior Planning Officer

From: Debbie Ealand
Housing Supply Officer
Ext: 4526

Your Ref: 25/00571/FP

Date: 22 April 2025

Full Planning Permission: Erection of 24 dwellings including creation of vehicular access off High Street, associated parking, drainage, amenity space and landscaping.

Land North Of, Milksey Lane, Graveley, Hertfordshire.

Case Ref No: 25/00571/FP

Dear Alex,

Thank you for your memo of 31 March 2025 in respect of the above application for full planning permission.

Graveley is a Category A village in the Local Plan and development will be permitted within the village boundary. There is one allocated site, site GR1, within the village, which is expected to deliver a total of 8 new homes. Strategic housing site north of Stevenage, (NS1), is also within the parish of Graveley and is expected to deliver 900 new homes.

The development incorporates the majority of the allocated, site GR1 and is within the village boundary. A small part of the site is within the conservation area, although no residential dwellings are proposed on this part of the site.

The affordable housing requirement is 35% on sites which will provide between 15 and 24 dwellings, in accordance with the Local Plan.

The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Strategic policies should be informed by a local housing need assessment to determine the minimum number of homes needed, in accordance with the NPPF.

Paragraph 63 of the NPPF says "Within this context of establishing need, 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 and people wishing to commission or build their own homes".

Paragraph 64 of the NPPF says "Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, 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.”

A rural housing needs survey was undertaken in Graveley in 2020 by the Rural Housing Enabler at Community Development Action (CDA) Herts.

The 2020 survey identified a need for 10 affordable dwellings:

Type	Affordable rent minimum	Total
1 bed flat / house	0	2
2 bed flat / house	1	5
3 bed house	0	1
4 bed house	0	1
1 bed sheltered / bungalow / accessible	0	1
TOTALS	1	10

Application 21/02624/FP was granted on 27 June 2022 for the erection of 9 affordable homes which will meet the purely local housing need identified.

Within the overall 35% affordable housing requirement a 65%/35% rented/intermediate affordable housing tenure split is required, in accordance with the Local Plan and the council's Developer Contributions SPD.

The 2023 Strategic Housing Market Assessment (SHMA) identifies a greater need (62%) for larger (3,4 and 5 bed homes) for rent and 38% for smaller (one and two bed) homes for rent. For intermediate affordable housing tenure there is a greater need for smaller (one and two bed) homes at 80% and 20% for three bed houses.

Based on the provision of 24 dwellings overall, the affordable housing requirement would be 8 dwellings; 5 rented and 3 intermediate affordable housing tenure.

There is high housing need across the district for two bedroom family homes for rent. To meet housing needs and Local Plan policy requirements of HS2 and HS3 the affordable housing should comprise 3 x 2 bed houses and 2 x 3 bed houses for rent and 2 x 1 bed homes; and 1 x 3 bed house for other intermediate affordable housing tenure.

The applicant is proposing eight affordable dwellings, but the mix differs from that indicated above and does not meet housing need. The applicant has not provided plot information on the tenure for the affordable housing and this is required in addition to revisions to the size and type of affordable housing.

Plots 3,4,and 5 could make up the intermediate affordable housing and if one of the houses at plot 20, 21 or 22 was converted to a 2 bed house this would meet housing need, with these three plots along with plots 6 and 7 comprising the rented affordable housing.

The affordable homes should be owned and managed by a registered provider, be physically indistinguishable from the market housing and be allocated to applicants with a local connection to the parish of Graveley, in the first instance.

The affordable homes are all terraced housing, and the market housing is detached or semi-detached so how does the applicant propose to ensure that the affordable housing will be physically indistinguishable from the market housing.

Where a need for affordable housing is identified the definition in Annex 2 of the Framework should be applied to the type of affordable housing required.

The definition for affordable housing includes 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).

The council currently accept social rent and affordable rent for the rented tenure dwellings, although the 2023 SHMA provides evidence that many more people require social rented homes. It should be noted that the affordable rent for one and two bedroom dwellings should be no more than 80% of the equivalent local market rent (including service charges, where applicable).

For three bedroom dwellings the affordable rent should be no more than 70% of the equivalent local market rent (including service charges, where applicable) and for a four bedroom dwellings the rent should be no more than the equivalent social rent (excluding service charges, where applicable) for a four bedroom dwelling in the locality, to ensure affordability.

All rents must be within Local Housing Allowance (LHA) rates, in accordance with the Local Plan, the Council's Tenancy Strategy and the Developer Contributions SPD.

As Graveley has a population of 3000 or less staircasing on any shared ownership is restricted to 80% in accordance with The Housing (Shared Ownership Leases) (Exclusion from Leasehold Reform Act 1967) (England) Regulations 2009 which came into force on 07 September 2009. The regulations include the introduction of Protected Area Status for settlements currently exempt from the Right to Acquire (i.e. those with populations of less than 3000).

The nationally described technical housing standards provide the nationally recognised standards for bedrooms, storage and internal areas in new dwellings across all tenures. All the affordable units are required to meet these standards.

Grant funding for the provision of affordable housing is not available on S106 sites and any affordable homes should be delivered through planning gain alone.

The applicant will need to provide documentary evidence of any viability issues using a recognised financial toolkit, which the council will have independently assessed at full expense to the applicant.

I hope this information assists you. Please contact me if you require any further information.

Regards

Debbie Ealand
Housing Supply Officer