

Councils Response to Inspectors Initial Questions Friday 24th May 2019

10. Question 10

NPPG Paragraph: 008 Reference ID: 2a-008-20190220 advises that strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. [i] Has this been done and [ii] why is the Plan start date 2020?

- 10.1. [i] Yes. The local housing need figure was calculated at the start of the plan making process in 2006, and was initially set out in the draft and then final Regional Spatial Strategy (RSS) for the Eastern Region. At that time the figure for St Albans was 360 dwellings per annum.
- 10.2. With the revocation of the RSS, the council conducted and updated housing market need assessments on several occasions, as evidenced in documents HOU 002 to HOU 013.
- 10.3. Consideration of the local housing needs calculation for the current draft Local Plan was set out initially in the PPC reports in September 2017 and subsequent PPC reports. They show the use of MHCLG 'standard method' from September 2017 to calculate the local housing need figure currently set out in the draft Local Plan.

NPPF

60. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

- 10.4. [ii] Because 2020 is the earliest realistically possible date of adoption of the Plan and is therefore appropriate in the context of the District, the NPPF and PPG.
- 10.5. It can be noted that the PPG sets out an important context with regard to the Plan start date:

Can strategic policy-making authorities take account of past under delivery of new homes in preparing plans?

The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.

Where an alternative approach to the standard method is used, past under delivery should be taken into account.

Paragraph: 011 Reference ID: 2a-011-20190220

Revision date: 20 02 2019

How can plan-making authorities apply the method to the overall plan period?

The method provides authorities with an annual number, based on a 10 year base line, which can be applied to the whole plan period.

The National Planning Policy Framework requires strategic policies to look ahead over a minimum 15 year period from adoption, although authorities are required to keep their policies under review.

Paragraph: 012 Reference ID: 2a-012-20190220

Revision date: 20 02 2019

- 10.6. Whilst only informal, in discussions with MHCLG officers and members of PAS at events in 2017 and 2018 this 'forward-looking Local Plan from point of earliest realistic adoption' approach was considered potentially acceptable.