

EXAMINATION OF THE ST ALBANS CITY AND DISTRICT LOCAL PLAN, STAGE 1
MATTER 2 – HOUSING GROWTH & HOUSING STRATEGY
HEARING STATEMENT OF LIGHTWOOD STRATEGIC

Issue 1 – Local Housing Need

14 To determine the minimum number of homes needed, paragraph 61 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in the PPG, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. The PPG advises that the standard method provides local planning authorities with an annual housing need figure which can be applied to the whole plan period.

Q1 What is the plan period for the submitted St Albans Local Plan? Is this sufficiently clear to users of the Plan?

SP1 and SP3 are clear that plan period runs from October 1st 2024 to 31st March 2041. Table 3.2, the housing trajectory, also notes that 2024/25 is being counted as a half year.

If the Plan is adopted by 31st March 2026 this period will extend 15 years post adoption.

Although this question does not focus on supply, our interpretation of Table 3.2, as set out in our representations, is that in 2024/25 a full years' worth of completions is being counted towards a half year requirement. We note the publication SADC/ED17A, but that this appears to also be counted a full years' worth of completions (470) for 2024/25 to a proposed plan period that begins in October 2024.

If this is confirmed then, as set out in our representations, the plan period should move back to April 1st 2024, or the Council must show that they know how many homes were built between then an October 2024 and discount them from plan period supply. Based on SADC/ED17A, the Council does not have that data and so the plan period should begin at April 1st, 2024, and a full years' worth of housing need and completions should be recorded. This is without prejudice to the totality of our position on the base date of the Plan, set out under Q2.

Q2 What is the minimum number of new homes needed over the whole plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the PPG?

St Albans is an LPA where the true housing need is capped for the first post standard method process of plan-making. The actual need is for 1,169 per annum and the capped need is for 885 per annum. The Plan fails to identify or state the actual level of need. The ability for an LPA to 'initially' Plan for capped need does not extinguish the existence of the actual level of need, which should be recorded, not least because it contextualises the performance of the Plan (including within the SA) and relates to whether early review provisions are required.

As set out under Q1 we do not think that the Plan period can begin at 1st October and cover 16.5 years; it must move back to April 1st, 2024, to cover the 17 years 2024/25-2040/41

The Plan should identify in the supporting text to the relevant strategic policies (SP1, SP3) that the capped need for this plan period is 19,873 (17 x 1,169). The supporting text and relevant strategic policies themselves should identify a housing requirement of 15,045 (17 x 885). The supporting should also record the difference as being 4,828 homes. Page 5 and 6 of our representations highlight what the PPG (ID:2a-007-20190220) says about such circumstances in respect of an early review. Those representations have since been overtaken somewhat by the December 2024 standard method and the transitional arrangements of the December 2024 NPPF. An immediate review will be requirement in any case on account of the 80% housing requirement threshold. Nonetheless, as this Plan is being examined under a previous version of the NPPF the justification of early review provisions should be captured by the wording of the Plan in any case.

The standard method against which this Plan is being examined methodically absorbs unmet need prior to its introduction in 2018. However, it does not absorb unmet/undelivered need after its introduction. The logical interpretation of the PPG's position on this matter is critical to the soundness of the proposed housing requirement. Page 1-4 of Lightwood's Regulation 19 representations set out why the plan period should start at least 1st April 2020 (if not 2018).

The Council's logic would be that if no housing had been built since 2018 or 2020 that this is not of concern as the standard method can be simply applied from April 2024 and capture that under supply. The reality, as set out on page 3 of our representations, is that some housing has been built since 2018 and 2020 but that up to the end of 2023/24, 2,639–1,944 fewer homes than required against the capped requirement have been delivered. Clearly, the evolving (yet essentially static) outputs of the standard method do not pick up this level of under supply. The position obviously

worsens against the uncapped need. It should be recalled that this examination is only taking place because the previous Plan had to be withdrawn in 2020, and if that had not failed, a higher housing requirement would have been in place across what would have been that plan period. The current Plan should make provisions to absorb needs that are at risk of being lost from the planning system. The SA identifies unutilised alternative strategic locations at St Albans that can and should be deployed to address this gap to 2041.

15 The PPG advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Circumstances may include situations where there are growth strategies for an area, where strategic infrastructure improvements are proposed or where an authority is taking on unmet housing needs from elsewhere.

Q3 Do any of these circumstances apply to St Albans?

There are no relevant circumstances for this examination that serve to generate an annualised level of housing need above the minimum uncapped need, in respect of St Albans' own needs. As set out above, the Plan period should begin in 2018 or 2020 to capture non-delivery against needs for those years. Alternatively, the plan period could move by 6 months to April 1st 2024 and that non-delivery added to the period 2024-2041.

It is clear from Issue 1 the inspectors have identified, through SoCGs, foreseeable unmet needs issues for Three Rivers and Hertsmere new style Plans (both have recent old-style Plans that never made it to examination). It is not necessary for a neighbouring Plan to have reached the statutory consultation stage within the new system plan-making before making a final judgement as to whether unmet need is likely and to what degree. For Three Rivers and Hertsmere to raise unmet need in an SoCG, they must have some idea on its likely existence and level, at this current point in time. The SA of the St Albans Plan identifies two strategic locations at St Albans that can play a role in meeting neighbouring unmet need. Subject to the Inspectors' Matter 1 conclusions, the level of housing need for St Albans to plan for in this Plan may need to increase.

Issue 2 – The Housing Requirement

Q1 What is the justification for a) the level of housing proposed in the first 5 years post adoption, and b) the significant uplift from 485 to 1,255 dwellings per annum thereafter? Are the figures justified?

We recognise the in-principal legitimacy of a stepped trajectory, however a Plan that delivers only around 50% of capped need in the first 5 years from adoption, is a concern. This also compounds

under delivery in the two years pre-adoption. It is for the Council to argue that it has exhausted the identification and allocation of sustainable short-term supply. Others may take a different view.

The proposed stepped requirement of 485 per annum appear to give the Council 'an unduly easy ride' in respect of the maintenance of 5-year land supply before/during the next phase of plan review. Whilst the first 'step' needs to be deliverable, the Plan should be enabling of proposals that can improve short term performance and even shore up medium to long term performance.

For instance, an application for around 150 houses, on what was deemed to be a grey belt very recently received a resolution to permit at Round House Farm, Roestock Lane at Colney Heath (a washed over settlement). This site is not proposed as an allocation in the Local Plan, but the Committee viewed it as sustainable development grey belt land,

If there are other Roestock Lane sites 'out there', then the Plan should be allocating now to them improve short term deliver (thus pushing up the stepped requirement in the early years). The submitted Plan claims a slight over supply, which is extinguished once the plan period moves back to April 2024 (minimum). More short-term supply could see overall supply nudge above the minimum overall requirement, but equally it will shore up overall delivery. There is no contingency once the plan period moves back to April 2024, and there are delivery rate risks at HGC. Short of the allocation of more sites the most positive approach), the Plan should be enabling of sustainable development proposals on grey belt and the stepped trajectory should not be used to deflect shield sites like Round House Farm from coming forward.

A stepped trajectory is allowable, but the figures need more careful consideration, and the Plan should either allocate more sites that can deliver all or some or all their capacity in the first 5 years, or be enabling of windfall on grey belt outside settlement boundaries.

Q2 In response to the Inspectors' Initial Questions, the Council suggests that Policy SP3 should be modified to include a stepped requirement. Is this necessary for soundness, and if so, what should the housing requirement be?

If a stepped requirement is accepted, it should be firmly embedded in Policy (SP1 or SP3). SP1 rather SP3 appears to be the more logical home for this, and ideally the housing requirement headlines should only find form in one policy (SP1).

We cannot yet say what the requirement should be in the early years, but under Q1 highlight that it may not/should not be as low as is currently proposed

Q3 Is the housing requirement intended to be found in Policy SP1 or SP3?

This really for the Council to answer, but it should be stated in one Policy only (SP1) and not repeated in SP3.

Issue 4 – Distribution of Housing Growth

18 Policy SP1 states that the Settlement Hierarchy provides the basis for the allocation and location of growth, locating most growth generally within and adjacent to the larger and most sustainable urban centres in Tiers 1-3 (St Albans and Hemel Hempstead, Harpenden and London Colney).

Q1 How does the distribution of housing growth compare with the settlement hierarchy over the plan period, taking into account completions, commitments and sites identified in the Local Plan? Does the spatial strategy reflect the size, role and function of settlements in Policy SP1?

Our headline observation here is that the identification of Site B3 at Redbourn for 545 home is essentially on account of the performance of Green Belt between the village and the M1. Arguably the spatial strategy directs too much housing to Redbourn on sustainability grounds as there are no higher order facilities (secondary school and there are unused locations that perform much better in respect of access to bus and rail services. The proximity of HGC and its planned facilities is noted, and this highlights the need for non-car mode connectivity, including by way of the Nickey Line.

19. Policy SP1 also states that broad locations are defined as sites of over 250 dwellings or strategic scale employment sites.

Q2 What is the justification for referring to sites over 250 dwellings as 'broad locations' when they are identified in Part B of the Plan? Is this approach sufficiently clear to users of the Plan and is it effective?

The Inspectors are referred to Page 13 of our Regulation 19 representations. There is unnecessary scope for misinterpretation and so a different term should be used.