

ST ALBANS LOCAL PLAN HEARING STATEMENT

MATTER 9 – HOUSING LAND SUPPLY

STONEBOND PROPERTIES

In response to the discussion around the Housing Trajectory on Tuesday 14th October at day 1 of the Stage 2 Hearing sessions, Stonebond Properties would like to place on record their concerns with regards to the revised approach to the stepped approach set out in the Council latest housing trajectory set out in their Stage 2 Matter 2 Hearing Statement.

We understand that this is likely to be subject to further discussion under Matter 9 and although we are not a participant in this session, our written submissions are hopefully helpful in informing the Inspectors' thoughts on whether the introduction of a 300-unit step at the start of the plan period is a sound approach.

As was set out in Stonebond's previous representations and their Stage 1 Matter 2 Hearing Statement (Issues 2), they have no issue with the inclusion of a stepped trajectory in principle. Their concern is the extent of the step, particularly in the early years of the plan period, when the need for such a great step could be avoided through the allocation of a greater number of smaller sites, deliverable in the short term such as their sites at Gustard Wood (site M12) and to the rear of Notcutts Garden centre (CH-29-21).

As set out in response to other matters, and discussed at the hearing sessions, our primary concern is that the inappropriate use of Green Belt buffers in the Green Belt Assessment, along with an inconsistent approach to identifying washed over villages in the same report, and the heavy reliance on work in the identification of sites for allocation, has led to a number of small scale sites that are suitable for development being missed. Stonebond's site at Notcutts Garden Centre is a prime example of this. If the site selection work had been completed in a sound manner, consistent with national policy (particularly paragraph 147 of the NPPF (December 2023) which requires a focus on brownfield sites and those well served by public transport) the need for such a significant step would be reduced.

The Planning Practice Guidance (PPG) covers stepped trajectories at two points. Reference ID: 68-021-20190722 sets out when is a stepped housing requirement appropriate for plan-making. It states that

A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.

Given the situation in St Albans where there is a significant change in the level of the housing requirement and where there are strategic sites which will take time to start delivering, this provides the justification, in principle, for utilising a stepped trajectory.

However, it goes on to state that set policy makers will need to ‘*set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs*’ and that ‘*strategic policy-makers should ensure there is not continued delay in meeting identified development needs*’.

We consider that the evidence that has been presented by the Council goes part way to justifying the need for a stepped trajectory, particularly in terms of the deliverability of strategic sites needed to meet the higher level of growth now required in the area. However, in addition to not considering that the extent of the step for years 1-5 is justified, we do not consider that the use of potential failure of the Housing Delivery Test (HDT) to support the introduction of an initial step of 300 in years -1 and 0 (the first two years shown on the revised housing trajectory) is justified (Council Stage 2, Matter 2, Issue 1.1 Appendix 2, paragraph 4-6).

In our view this is contrary to the PPG and the requirement to ensure that there is not a continued delay in delivering housing to meet identified needs, making it contrary to policy. It also leads to a plan that is not positively prepared.

The second PPG reference is Reference ID: 68-039-20190722, which covers the role of a stepped trajectories. It sets out:

Where the adopted housing requirement is stepped, these stepped requirements will be used in the Housing Delivery Test in place of annual average requirement figures. A stepped requirement allows authorities to reflect step changes in the level of housing expected to be delivered across the plan period. The buffer applied to the 5 year housing land supply does not constitute a stepped requirement.

This guidance refers to the step reflecting the level of development expected in the plan period. In the case of years -1 and 0, the completion are either known or forecast to be above the 300 unit stepped requirement. In our view, this is completely contradictory to the PPG and the requirement for a stepped trajectory to be based on expected rates of delivery.

Stonebond do have some sympathy with the position of the Council and the concern that the Local Plan could be out of date as a result of a HDT failure the year after adoption. However, their view is that this is the legacy of the fact there has been a failure of the authority to have a Local Plan in place for a prolonged period of time. The role of a stepped trajectory is not to fix these failings but to provide clarity on the deliverability of growth planned to meet future housing need.

The emerging Local Plan is already (legitimately under the transitional arrangements) planning for a significantly lower level of housing than the revised standard method generates. The stepped approach over years 1-5 already means that even the previous LHN of 858 will not be met in the short term.

The step to 1,240 from year 6 is almost irrelevant as the Local Plan should have been reviewed by this point and a new housing requirements and spatial strategy set. The Local Plan is therefore already delaying the delivery of housing need, contrary to the PPG, and effectively retrofitting the step in years -1 and 0 will reinforce this delay.

As mentioned at the Matter 2 hearing session, the implication of the Council fixing the position to ensure they pass the HDT despite completions falling well below the LHN requirement (and the previously adopted housing target – albeit this is well out of date) is that the unmet need for residential development necessary to allow grey belt sites to be brought forward as appropriate development in the Green Belt under NPPF paragraph 155/156 would fall away.

In our view, shutting off this source of supply would further delay the delivery of homes in the area unnecessarily at a time when there is a clear need to ensure as many suitable sites are developed as possible to meet the needs of the area – and importantly address the massive shortfall in housing delivery over recent years.

Overall, whilst it is understood why the Council would want to ensure that the Local Plan passes the HDT (as well as demonstrating a deliverable 5-year land supply) on adoption, Stonebond do not consider that the proposed approach is consistent with national policy, justified, or leads to a plan that is positively prepared.

To ensure the plan is sound, Stonebond consider that the step in years -1, and 0 should be in line with the completions (or expected completions) in these years (693 in total). If this results in a failure of the HDT on adoption, this is a legacy of the previous lack of plan making in the area and not something that the plan is capable of addressing – albeit the allocation of a greater number of suitable small sites could limit the potential for the HDT to be failed in future years.