
WRITTEN STATEMENT ON BEHALF CREST NICHOLSON

Regulation 19 Submission Number: 266

Inspector's Matter 2 – Housing Growth & Spatial Strategy

Issue 2 – The Housing Requirement

- 1.1 Supporting paragraph 3.27 of the draft Local Plan (September 2024) advises that the '*housing trajectory has been stepped*' (**Q2**). The PPG notes that stepped trajectories can be appropriate but is clear that there is a '*need to identify the stepped requirement in strategic housing policy*' (Paragraph: 012 Reference ID: 68-021-20190722). In this regard, Strategic Policy SP3 will require modification to include the stepped trajectory.
- 1.2 As to the scale of the 'step' (**Q1**), this ought to be sufficiently ambitious given the significant under-delivery of new homes in the District. It should also recognise draft strategic site allocations that now have resolutions to grant (e.g. NW Harpenden) and could deliver additional homes in the early part of the Plan period, alongside those where applications are under preparation (e.g. NE Harpenden). The current proposal to introduce a requirement for only 485dpa in the first five years of the Plan is too low.
- 1.3 Whilst Crest does not consider SADC's housing requirement to be unsound, there appears little need for the Local Plan to duplicate this across two strategic policies (SP1 and SP3), particularly given that NPPF (2023) paragraph 16f) specifically seeks to avoid duplication (**Q3**). Draft Strategic Policy SP1 reads more as a spatial 'vision' than a strategy. There is also clarification/explanation within the Policy wording which could be moved to supporting text to make this policy more succinct (in line with NPPF 2023, paragraph 15). For example, supporting paragraph 3.8 already sets out how the housing requirement was calculated (i.e. the standard method) causing further unnecessary duplication.
- 1.4 The housing requirement and method of calculation are then duplicated again in draft Strategic Policy SP3. SP3 also seeks to make a distinction between housing need and the housing requirement which does not appear to be necessary within the Policy itself.
- 1.5 In the interests of clarity, it would also be helpful (at paragraph 3.8) to set out which standard calculation method was used to calculate the housing requirement given that this has recently changed and will continue to do so.

Issue 3 – Settlement Hierarchy

- 1.6 The settlement hierarchy in the District is well established, particularly the upper tier settlements of St Albans and Harpenden that have an excellent range of services, facilities and infrastructure and are well connected to key destinations by road and rail. Not showing developments since 1994 at the Tier 1 and Tier 2 settlements would not alter their role or function. Whilst lower tier settlements are more sensitive to change, given how few there are in the District, this is unlikely to have altered the settlement hierarchy, nor the clear case for St Albans and Harpenden to

remain the top tier settlements and thus the most sustainable locations for growth in the spatial strategy.

Issue 4 – Distribution of Housing Growth

- 1.7 Cumulatively, the largest allocations of new homes are to the top tier settlements of Hemel Hempstead, St Albans and Harpenden, with lesser allocations to the Tier 3 and 4 settlements of London Colney and Redbourn (**Q1**). This is in line with the settlement hierarchy and provides opportunities for sustainable growth of the existing communities.
- 1.8 The Inspector's **Q2** of Issue 4 relates to the terminology used when referring to sites of over 250 homes. These are identified as 'broad locations'. However, all are defined site allocations. 'Broad locations' implies target areas for growth rather than individual sites. Whilst this does not go to the heart of the soundness of the approach/ strategy, the terminology could be made clearer. For example, referring to these as 'growth locations' or 'strategic sites' would be more accurate descriptions.

Issue 5 – Site Selection Methodology

- 1.9 There are numerous ways in which a site selection process could be managed. However, it is important that these take account of the specific circumstances of an area and wider sustainable development objectives. SADC undertook a staged approach which sought to achieve sustainable patterns of development by focussing on sites contiguous with the boundaries (or within the buffers) of existing settlements. Sustainable patterns of development are a key objective of the NPPF in the pursuit of sustainable development. Moreover, this allowed a focussed review of the performance of these Green Belt sites and corresponding harm, which is a specific matter to consider in the District.
- 1.10 Whilst alternative approaches could have been taken, there is a logic to SADC's site selection process that was rigorously applied and has resulted in a range of suitable, available and deliverable sites of different sizes and in sustainable locations, such as NE Harpenden.