

HBF Statements St Albans Local Plan EIP

Matter 2 – Housing Growth and Spatial Strategy

Issue 1 – Local Housing Need

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

HBF notes that paragraph 1.5, SP1 and SP3 state that the period covered by this plan is from the 31st of October 2024 to the 31st of March 2041. HBF question whether it is necessary for the plan period and requirement are stated in both SP1 and SP3. It is also somewhat confusing for the plan period to start halfway through 2024 and whilst not unsound it would be helpful to understand why the council has chosen to start the plan halfway through the 2024/25 period.

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?

Using the standard methodology the minimum number of homes needed in St Albans is 885 dpa resulting in a total need of 14,603 homes.

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?

While the Council has not agreed to take the unmet needs of another area, HBF considers necessary for the Council increase its supply to address the housing needs of other areas. While we accept that there is now some uncertainty as to whether there will be unmet needs within the HMA, there are identified unmet needs in London that the Council could have acknowledged and potentially reduced through an increase in the number of homes being delivered. Whilst such a contribution should be small in relation to the significant unmet needs in the capital it must be remembered that shortfalls in housing delivery in London will have a significant impact on areas with excellent links to the capital, such as St Albans, and any increase in supply will potentially improve the impact of any increase in supply on affordability that is in part high due to the strong ties with the capital.

Issue 2 – The Housing Requirement

In response to the Inspectors' Initial Questions, the Council states that a stepped housing requirement is justified to allow sufficient time for the significant uplift in housing delivery to be realistically delivered. The stepped requirement is proposed as 485 dwellings per annum for the first 5 years post adoption of the Plan, rising to 1,255 dwellings per annum in years 6-10.

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?

HBF do not consider it to be justified for the stepped housing requirement to be so low in the first five years of the local plan. It is recognised that supply has been restricted in recent years and that in order to increase supply the Council needed to amend Green Belt boundaries. However, HBF consider that more could have been done to allocate smaller sites to boost supply in the short term. Delivery in the first 5 years of the plan is expected to be 2,491 homes, just over half of the 4,425 homes that are required by the NPPF over that period. These are significant shortfalls, and the Council should have in the first instance looked to address this through amendments to the Green Belt boundary that would have supported the allocate more smaller sites that would start to deliver earlier in the plan period, allowing supply to increase more rapidly in the first five years.

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 the use of a stepped requirement is considered to be sound it must be set out in policy.

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

For the council. While no particular harm arises from the repetition of the housing requirement the NPPF does indicate at paragraph 16 that unnecessary repetition should be avoided.

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