

## Matter 2 – Housing Growth and Spatial Strategy

### 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?**

- 1.1 The Plan period is from 1 October 2024 until 2041. Paragraph 1.5 sets this out directly:

*This Plan contains all the planning policies and proposals for the future growth of the City and District of St Albans. It covers the period 1 October 2024 to 31 March 2041.*

- 1.2 This Plan period is further confirmed at SP1:

...

*Following the Government's required 'Standard Method' for calculating local housing need, the Council will identify and allocate land for the delivery of at least 14,603 net additional new houses, or 885 per annum in the period 1 October 2024-31 March 2041.*

- 1.3 This Plan period is again confirmed at SP3:

...

*This housing need figure is the same as the housing requirement figure of 885 dwellings per year, or a total need of 14,603 in the period 1 October 2024 to 31 March 2041*

- 1.4 The date of adoption of the Plan is indicatively set at 31 March 2026 as set out in the Local Development Scheme (LPCD 09.01 Local Development Scheme (2024)):

#### **Local Development Scheme**

	Regulation 18 Consultation	Regulation 19  Publication	Submission	Examination	Adoption
Local Plan	July – Sep 2023	Sep – Nov 2024	Dec 2024	Dec 2024 - Feb 2026	March 2026

- 1.5 This provides for 15 years post-adoption of the Local Plan, as set out in the NPPF at paragraph 22:

*Strategic policies should look ahead over a minimum 15 year period from adoption<sup>13</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.*

- 1.6 The PPG sets out:

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

*The method provides authorities with an annual housing need figure 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-012-20241212*

*Revision date: 12 12 2024 See [previous version](#)*

- 1.7 LPCD 03.01 the Sustainability Appraisal Report sets out:

***2.4 The plan period***

*2.4.1 The new Local Plan is likely to be adopted in 2025/26, and must “look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure...” As such, the plan period runs to 2041.*

*...*

*5.2.9 In conclusion, LHN is understood from the Government’s standard method, and this currently stands at 885 dwellings per annum (dpa). This amounts to 14,603 homes in total over the 16.5 year plan period, which runs from midway through the 2024/25 monitoring year to the end of the 2040/41 monitoring year.*

**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?**

- 2.1 The minimum number of new homes needed over the whole plan period (1 October 2024 to 31 March 2041) as calculated using the standard method is 14,603 dwellings. This is set out in Strategic Policy SP3 – Land and the Green Belt of the submitted Local Plan:

*The minimum number of homes needed in the District, following a local housing need assessment conducted using the Government's required Standard Methodology – is 885 dwellings per year, or a total need of 14,603 to 2041. This housing need figure is the same as the housing requirement figure of 885 dwellings per year, or a total need of 14,603 in the period 1 October 2024 to 31 March 2041.*

- 2.2 Yes, the Council considers that these calculations are accurate and fully reflect the methodology and advice in the December 2020 PPG on housing and economic needs assessment. The use of the December 2020 PPG methodology and advice is what is required for this Plan, which is being examined on the basis of the NPPF December 2023. The standard method calculations resulting in a minimum annual local housing need figure of 885 dwellings per year (as at 25 March 2024) for St Albans are set out in HOU 02.01 South West Herts Local Housing Needs Assessment Update Final Report (March 2024) (see Chapter 5, p.59-65 and Table 5.2, p.65).
- 2.3 Further details of the Council's standard method calculations are set out in M2 I1 Q2 Appendix 1 - St Albans standard method housing need calculations (25 March 2025).
- 2.4 The Council's calculations for the minimum number of new homes needed over the whole plan period as calculated using the standard method are set out below:

Minimum number of new homes needed over plan period = standard method  
minimum annual local housing need x total number of years in plan period

Minimum number of new homes needed over plan period (1 October 2024 to 31 March 2041) = 885 dwellings x 16.5 years

**Minimum number of new homes needed over plan period (1 October 2024 to 31 March 2041) = 14,603 dwellings**

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?**

- 3.1 No, the Council considers that the circumstances where it may be appropriate to consider whether actual housing need is higher than the standard method do not apply to St Albans. The December 2020 PPG on housing and economic needs assessment (Paragraph: 010 Reference ID: 2a-010-20201216) sets out:

#### ***When might it be appropriate to plan for a higher housing need figure than the standard method indicates?***

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.*

*Paragraph: 010 Reference ID: 2a-010-20201216*

*Revision date: 16 12 2020*

3.2 Taking the circumstances in order:

*growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals)*

3.3 No such 'strategy' or 'Housing Deal' affects the District.

*strategic infrastructure improvements that are likely to drive an increase in the homes needed locally*

3.4 No such infrastructure improvements affect the District.

*an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground*

3.5 No such agreements affect the District.

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.*

3.6 No such situation affects the District.