

Matter 4 – Type and Mix of Housing

Issue 5 – Accommodation for Gypsies, Travellers and Travelling Showpeople

Q1 Does the Plan adequately set out the accommodation requirements for gypsies, travellers and travelling showpeople over the plan period?

- 1.1 The Plan does adequately set out the policy basis for how the accommodation requirements for gypsies, travellers and travelling showpeople will be met, but it does not explicitly identify a pitch requirement or the specific strategy for meeting the needs. Main Modifications are proposed in this regard in order to add in to the reasoned justification for Policy HOU6 specific reference to the pitch and plot requirement and the strategy for how those needs will be met. This is achieved through adding in information that was within the Stage 1 MIQ Matter 1 Issue 6 answers to Questions 2 and 3 (available via: [Matter 1 - Issue 6](#)). The proposed additions shown underlined below are from paragraphs 2.1 and 3.19 respectively of the aforementioned Stage 1 MIQ answers.
- 1.2 The Main Modifications proposed are set below and in SADC/ED85A and SADC/ED85C:

Gypsies, Travellers and Travelling Show People

4.20 National planning policy sets out an overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

4.21 The Council seeks to establish a positive framework for how provision for Gypsies, Travellers and Travelling Show people will be made in the District. This will guide development to more sustainable parts of the District, provide enhanced quality of life for the Gypsy and Traveller community, help to prevent unauthorised sites and ensure that environmental concerns, impact on the Green Belt and community cohesion are proactively addressed.

4.22 Evidence shows that there are future accommodation needs for Gypsies and Travellers over the Plan period. ~~The Plan therefore provides additional accommodation opportunities which includes provision of new sites as well as potential redevelopment and expansion at existing sites through planning applications. For potential new sites, site suitability is affected by factors including proximity to the strategic road network, site size, the landscape and topography of the area, and availability of local services.~~ These are set out in the Council's Gypsy and Traveller Accommodation Assessment Final Report 2024 (GTAA) and can be summarised as follows:

- Need for gypsy and traveller pitches to 2041 for households that meet the PPTS 2023 definition: 95 pitches*
- Need for travelling showpeople plots to 2041: 7 plots*

4.22A The Council seeks to meet the identified need for additional pitches at private sites primarily through the regularisation, intensification, reconfiguration or expansion of existing sites. The Council seeks to meet the identified need for additional pitches at public sites through the two specific allocations identified in Policy HOU6, at East Hemel Central and East Hemel South Broad Locations. The Plan therefore provides additional accommodation opportunities which includes provision of new sites as well as potential redevelopment and expansion at existing sites through planning applications.

4.22B For potential new sites, site suitability is affected by factors including proximity to the strategic road network, site size, the landscape and topography of the area, and availability of local services.

- 1.3 Subject to the proposed Main Modifications to the reasoned justification for Policy HOU6 set out above and in SADC/ED85A and SADC/ED85C, it is considered that the Plan adequately sets out the accommodation requirements for gypsies, travellers and travelling showpeople over the Plan period.

Q2 Will the accommodation requirements be met through the allocations and policies in the Plan? If so, how? Should sites identified by the Council as contributing towards identified needs be allocated in the Plan?

Will the accommodation requirements be met through the allocations and policies in the Plan? If so, how?

- 2.1 Yes, it is considered that the accommodation requirements will be met through the allocations and policies in the Plan, as set out below.
- 2.2 Policy HOU6 – Gypsies, Travellers and Travelling Show People sets out the Council's approach to making suitable and effective provision to meet identified needs, as follows:

HOU6 – Gypsies, Travellers and Travelling Show People

To provide for the accommodation needs of Gypsies and Travellers and Travelling Show people the Council will:

- a) Consider proposals for new accommodation with regard to the potential and suitability of the following:
 - i. New sites as part of Broad Locations for development that should accommodate a maximum of 20 pitches (each pitch being designed to accommodate 1 family / household);*
 - ii. Reconfiguring or extending existing sites; and*
 - iii. Sites with temporary permissions.**
- b) Ensure that proposals make efficient use of land. Pitch sizes should not exceed 500m² and can be considerably less. Site design should be assessed*

in relation to the specific circumstances of the site and in particular whether there is a need for integrated general amenity and landscaping space;
c) Take account of any additional criteria contained in Government guidance; and
d) Based on a variety of factors including proximity to the road network most used by Gypsies and Travellers, development site scale, area topography and landscaping opportunities, and the wide range of uses to be provided in the Broad Locations for development; require provision of the following new sites:
i. East Hemel Hempstead (South) Broad Location - one up to 15-20 pitch site
ii. East Hemel Hempstead (Central) Broad Location - one up to 15-20 pitch site

- 2.3 The Council's 'Meeting the Accommodation Needs of Gypsies and Travellers and Travelling Show people - Evidence Paper' September 2024 (HOU 04.02) set out evidence to demonstrate how the identified need for gypsy, traveller and travelling showpeople accommodation in the District will be addressed. In section 5 'Approach to Meeting the Identified Need in the District' it noted the following:

5.1. There have been multiple Calls for Sites between 2009 and 2021 that have included calling for potential Gypsy and Traveller sites. There was also a specific 'St Albans Gypsy and Traveller Call for Sites 2024' which ran between Monday 8 July 2024 to Monday 19 August 2024.

5.2. Policy HOU6 of the Regulation 19 Local Plan identifies two specific identified sites within East Hemel Central and East Hemel South Broad Locations that would deliver up to 40 pitches over the Plan period. It also identifies criteria based policy for provision of pitches based on the approach encouraged in the PPTS. From 'duty to co-operate' discussions, it has been identified that there is no likelihood of any of the District's needs being met in neighbouring local authority areas.

- 2.4 The Council's 'Meeting the Accommodation Needs of Gypsies and Travellers and Travelling Show people - Evidence Paper: Addendum' November 2024 (HOU 04.01) built upon the above and set out, with reference to the findings and potential approaches to meeting needs as set out in the GTAA, the following high-level approach at paragraph 5.2:

- a) Private pitch provision: The Council seeks to meet the identified need for additional pitches at private sites primarily through the regularisation, intensification, reconfiguration or expansion of existing sites.*
- b) Public pitch provision: The Council seeks to meet the identified need for additional pitches at public sites through the two specific allocations identified in Policy HOU6, ie at East Hemel Central and East Hemel South Broad Locations*

- 2.5 As the Council's Stage 1 Hearing Statement in relation to Matter 1 Issue 6 Question 3 (available via: [Matter 1 - Issue 6](#)) set out:

3.7 Since the Evidence Paper Addendum November 2024 further work has been undertaken in order to demonstrate that the Council's approach will realistically lead to the needs being met in full. The further work comprises a

proforma assessment of both the existing traveller sites in the District and the sites which were put forward in the Gypsy and Traveller Call for Sites of Summer 2024.

3.8 The Gypsy and Traveller Call for Sites 2024 and proforma assessment of sites are introduced in the sections below and the proforma assessment findings are then presented. The detailed proforma assessments themselves are found in M1 I6 Q3 Appendix 1 - Proforma Assessment of Existing Traveller Sites and Sites Put Forward in the Call for Sites 2024.

2.6 The aforementioned Stage 1 Hearing Statement concluded, with reference to an appended 'Proforma Assessment of Existing Traveller Sites and Sites Put Forward in the Call for Sites 2024' (available via [Matter 1 - Issue 6.3 - Appendix 1](#)) in relation to 'Meeting the Identified Needs' as follows:

3.19 The Council seeks to meet the identified need for additional pitches at private sites primarily through the regularisation, intensification, reconfiguration or expansion of existing sites. The Council seeks to meet the identified need for additional pitches at

3.20 The proforma assessment identifies a maximum of 122 potential additional traveller pitches could be provided at private sites through the regularisation, intensification, reconfiguration or expansion of existing sites; of which 90 are on sites put forward in the 2024 Call for Sites, and 32 are not. Policy HOU6 identifies an additional 40 pitches at two new public sites, and these have been progressing through pre-application discussions with the landowner in a Planning Performance Agreement since summer 2024. The Council has therefore identified 162 potential pitch capacity to meet the need to 2041 of 95 pitches. Therefore, it is considered that the need for additional traveller pitches to 2041 can realistically be met. The assessment identifies a considerable excess of potential capacity for additional traveller pitches to 2041, but it is acknowledged that not all of the potential capacity will be needed or will actually come forward. Furthermore, it is noted that the assessment identifies an excess of potential capacity for additional pitches even if only those sites which were put forward in the 2024 Call for Sites, plus the two new public sites, are considered (a total of 130 pitches against a need of 95 pitches).

3.21 The proforma assessment also identifies a maximum of 12 potential plots for travelling showpeople at Noke Lane.

3.22 The Council's intention is to address the current and 5 year need for traveller pitches (54 pitches in the GTAA, 60 pitches from Plan adoption in 2026) through a combination of: the two specific allocations identified in Policy HOU6, permanent permissions to regularise pitches on existing sites; additional touring caravans on existing sites as opposed to more formally set out larger pitches; intensification of existing sites; and expansion of existing sites. This follows the approaches to meeting current and 5 year need suggested in the GTAA.

- 3.23 *The Council's intention is to address the need for additional private pitches to 2041 through a combination of: permanent permissions to regularise pitches on existing sites; additional touring caravans on existing sites as opposed to more formally set out larger pitches; intensification of existing sites; and expansion of existing sites.*
- 3.24 *The Council's intention is to meet the need for additional public pitches to 2041 through the two specific allocations identified in Policy HOU6, ie at East Hemel Central and East Hemel South Broad Locations. This would contribute up to 40 pitches towards meeting the overall 95 pitch need to 2041. The Council's approach to the quantum of public pitch provision (c.42% of the total pitch need) is reasonably in line with the relative proportion of need arising from public and private sites as identified in the GTAA.*
- 3.25 *The need for a total of 11 plots for travelling showpeople households to 2041 (7 plots in addition to the existing 4 unauthorised plots) can be met through regularisation / intensification of the existing Noke Lane site. This is in accordance with the GTAA recommendation at 8.15: "It is recommended that the current need could be addressed through the intensification or expansion of the existing yard in St Albans."*
- 3.26 *Taking the above into account, the appended proforma assessments demonstrate, with reference to constraints, site suitability, land ownership and reasonable assumptions, that the need for additional traveller pitches and plots to 2041 can realistically be met.*
- 3.27 *As such, it is considered that the Plan makes suitable and effective provision to meet identified needs and that needs will be met in full.*
- 2.7 Taking all of the above into account, it is considered that the accommodation requirements will be met through the allocations and policies in the Plan.

Should sites identified by the Council as contributing towards identified needs be allocated in the Plan?

- 2.8 The Council's considers that the identification of the two specific allocations identified in Policy HOU6 as set out above, plus the positive approach to the regularisation, intensification or expansion at existing sites (as set out above and below) will be adequate to meet the requirements; and that additional specific allocations are not required in order to meet the accommodation requirements.

Q3 Will there be a 5-year supply of deliverable pitches against the requirement?

- 3.1 Yes, it is considered that there will be a 5-year supply of deliverable pitches against the requirement.

- 3.2 The Planning Policy for Traveller Sites 2023 (PPTS)¹ definition of 'Deliverable' is as follows:

To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

- 3.3 Section 8 'Conclusions' of the GTAA sets out that:

8.5 Need from households who met the 2023 PPTS planning definition should be addressed through the intensification, reconfiguration or expansion of existing sites, or the allocation of new sites or pitches. The Council should also consider the regularisation of sites that currently have temporary planning permission or are unauthorised. In order to explore opportunities for need, or a proportion of need, to be met on existing sites the Council should consider completing a more detailed Pitch Deliverability Assessment (PDA). This approach has been successfully used by other Local Authorities in England and has concluded that a large proportion of need could, in principle, be met on existing sites.

8.6 For private sites it is also recommended that alternative approaches should be considered when seeking to address the levels of need identified in this GTAA, especially when seeking to meet the need through the intensification, reconfiguration or expansion of existing sites.

8.7 The first approach to consider is in relation to single concealed or doubled-up adults and teenagers who will be in need of a pitch of their own in the next 5 years. In the short to medium term it is likely that the accommodation need of these individuals could be met through additional touring caravans on existing sites as opposed to more formally set out larger pitches.

8.8 The second approach to consider is for sites occupied by larger extended family groups. Again, sites like this may be able to meet the overall accommodation needs through a combination of shared static caravans, tourers and dayrooms on existing sites which are, generally, each equivalent to the provision of a pitch – as opposed to more formally set out sites with separate pitches. It is common for conditions in Decision Notices for Travellers sites to simply place limits on the numbers and types of caravans as opposed to placing limits on the number of pitches.

- 3.4 The Council's 'Meeting the Accommodation Needs of Gypsies and Travellers and Travelling Show people - Evidence Paper: Addendum' November 2024 (HOU 04.01) references the above part of the GTAA where it sets out in relation to the approach to meeting 5 year needs:

¹ PPTS 2023 available via:

https://webarchive.nationalarchives.gov.uk/ukgwa/20241211225427mp_/https://assets.publishing.service.gov.uk/media/658198bb23b70a000d234c03/Final_planning_and_travellers_policy.pdf

2.2 Having reviewed the sites from where existing need arises in relation to pitch density, land ownership and planning and other constraints; the Council considers that:

- a) *In relation to single concealed or doubled-up adults and teenagers who will be in need of a pitch of their own in the next 5 years, in the short to medium term it is likely that the accommodation need of these individuals could be met through additional touring caravans on existing sites as opposed to more formally set out larger pitches, as referenced at 8.7; and*
- b) *sites occupied by larger extended family groups are likely to be able to meet the overall accommodation needs through a combination of shared static caravans, tourers and dayrooms on existing sites which are, generally, each equivalent to the provision of a pitch – as opposed to more formally set out sites with separate pitches; as referenced at 8.8.*

3. Public pitch provision

3.1 Section 8 'Conclusions' of the GTAA sets out that:

8.9 *In addition, a large proportion of current need identified in the GTAA (26 pitches) is from households currently living on the 3 public sites in St Albans. Whilst there is a small amount of pitch turnover on these sites it is unlikely to be sufficient to meet the levels of identified need. Therefore it is recommended that the Council consider opportunities to intensify or expand the existing public sites, or opportunities to develop a new public sites(s) in St Albans.*

3.2 *The Council considers that this need for public pitches would be met at the two specific allocations for new sites included in Policy HOU6 d) and subject of the Key development requirements for Part B sites H3 and H4. These policies require provision of a 15-20 pitch site at each of East Hemel Hempstead (South) and (Central) Broad Locations.*

3.5 The Stage 1 Hearing Statement for Matter 1 - Issue 6 summarises the approach to meeting the 5 year need as follows:

3.22 *The Council's intention is to address the current and 5 year need for traveller pitches (54 pitches in the GTAA, 60 pitches from Plan adoption in 2026) through a combination of: the two specific allocations identified in Policy HOU6, permanent permissions to regularise pitches on existing sites; additional touring caravans on existing sites as opposed to more formally set out larger pitches; intensification of existing sites; and expansion of existing sites. This follows the approaches to meeting current and 5 year need suggested in the GTAA.*

3.6 With reference to the 3 primary aspects of the PPTS definition of 'deliverable', the above approach can be justified as follows:

To be considered deliverable, sites should be:

- *available now / be achievable with a realistic prospect that development will be delivered on the site within five years:*

- a) In relation to the deliverability of public pitches, it has been agreed by the landowners that the 2 allocations at HGC (H3 and H4) required under Policy HOU6 d) and allocations H3 and H4 will be delivered as part of the development at East Hemel Hempstead (allocation sites H2, H3 and H4); and the planning application for this development is expected to be submitted before the end of this 2025. The updated Housing Trajectory sets out that the first homes will realistically be completed in 2029/30. The Council's expectation is that delivery will include the 2 public site allocations by the end of the 2030/2031 period; within 5 years of expected adoption of the Plan.
- b) In relation to the deliverability of private pitches, the GTAA sets out that it is from the existing sites that the existing 5 year need arises. It suggests in relation to an approach to meeting that need (at 8.7):
"The first approach to consider is in relation to single concealed or doubled-up adults and teenagers who will be in need of a pitch of their own in the next 5 years. In the short to medium term it is likely that the accommodation need of these individuals could be met through additional touring caravans on existing sites as opposed to more formally set out larger pitches"
- c) The Council undertook a Proforma Assessment of existing Traveller Sites and sites put forward in the Call for Sites 2024 (appended to the Stage 1 Matter 1 Issue 6.3 Hearing Statement, available via Matter 1 - Issue 6.3 - Appendix 1). As set out in the Hearing Statement:

Each proforma assessment includes the following elements:

- *Deliverability Assessment: comprising the following elements:*
 - o *SADC Traveller Call for Sites 2024: Stating whether an intensified or expanded site was put forward in a Call for Sites submission.*
 - o *Relevant Planning History: Consisting of planning history considered relevant to this assessment only.*
 - o *Suitability of Location: Consisting of:*
 - *Summary of major policy and environmental constraints, which would preclude development at the site or in certain parts of the site;*
 - *Summary of other key constraints, which would be likely to influence the extent / nature of development at the site, and a sentence as to whether the site size, landscape and topography of the area would preclude additional pitches; and*
 - *Summary of considerations relating to accessibility, including proximity to settlements and strategic road network and availability of local services.*
 - o *Potential for Regularisation of Pitches at the Existing Site: Setting out the findings of the GTAA 2024 as to numbers of temporary, tolerated or unauthorised pitches at the site, which may potentially be regularised to help meet need.*
 - o *Potential for Intensification of Existing Site: A spatial analysis of the size of the existing traveller site and, from a spatial*

perspective only without any consideration of constraints etc, the number of pitches / plots that could potentially fit in the site.

- o Potential for Expansion of Existing Site: Assessment from available records including planning application documents as to whether the owners of the existing traveller site also own adjacent land; and a comment as to whether the site was put forward in the 2024 Call for Sites.*
 - d) In summary, with reference to constraints, site suitability, land ownership and reasonable assumptions; the proforma assessments identified a maximum of 122 potential additional traveller pitches could be provided at private sites through the regularisation, intensification, reconfiguration or expansion of existing sites; of which 90 are on sites put forward in the 2024 Call for Sites, and 32 are not.
 - e) In relation to the Council's recent experience of planning applications including at appeal, this can be summarised as follows (see a fuller summary included application and appeal references in the response to Matter 1 Issue 3 Question 2). Of the 13no. valid applications for Gypsy and Traveller pitches received since 2019:
 - All but one application was for pitches at an existing site (either a site with previously allowed pitches or a retrospective application for existing pitches) and a site included in the GTAA (most relevantly in Appendix E: Site and Yard List).
 - The applications include proposals for additional pitches through extending existing sites or through intensification through reconfiguring existing sites, in a manner consistent with the Council's approach and set out in Policy HOU6 a)i.
 - The other site was at Land South of Bower Heath Lane, with application currently pending (see x above); it is noted that this is within the boundary of the North East Harpenden Broad Location site (Site B2) and that Policy HOU6 a) i. allows for consideration of "New sites as part of Broad Locations for development".
 - All 6 of the applications which were decided at appeal were allowed, and permission was granted.
 - f) Therefore, from a proportionate review of the Council's experience in relation to planning applications and appeals since 2019, the strong propensity is for existing families in the District to wish to expand provision on their own family-owned private sites. There was 1 proposal on a new site, but it is noted that this was within the boundary of a Broad Location, consideration of which is allowed for in Policy HOU6 a)i. The Council's experience also demonstrates a trend for such applications to ultimately be granted permission (unless found to have issues related to validity), including all 6 applications that went to appeal.
- *offer a suitable location for development:*
 - a) The proposed new sites at HGC (Site Allocations: East Hemel Hempstead Central (H3) and East Hemel Hempstead South (H4)) have been found by

the Council to offer a suitable location for development. Policy HOU6 d) sets out that the allocations at Hemel Garden Communities (H4 and H3) are: *'Based on a variety of factors including proximity to the road network most used by Gypsies and Travellers, development site scale, area topography and landscaping opportunities, and the wide range of uses to be provided in the Broad Locations for development'*.

- b) The proforma assessment approach provided a thorough assessment as to the suitability of existing sites for additional pitches through regularisation, intensification or expansion. It included assessment of Suitability of Location, explained in the Matter 1 Issue 6.3 Hearing Statement as follows:

o Suitability of Location: Consisting of:

- Summary of major policy and environmental constraints, which would preclude development at the site or in certain parts of the site;*
- Summary of other key constraints, which would be likely to influence the extent / nature of development at the site, and a sentence as to whether the site size, landscape and topography of the area would preclude additional pitches; and*
- Summary of considerations relating to accessibility, including proximity to settlements and strategic road network and availability of local services.*

- c) In relation to the identification of the HGC East Hemel Hempstead Central H3 and East Hemel Hempstead South H4 site allocations, and in relation also to the proforma assessment of existing sites, the Council's approach was informed by the approach to assessing the suitability of sites as set out in PPTS paragraphs 13 and 14:

13. Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community*
- b) promote, in collaboration with commissioners of health services, access to appropriate health services*
- c) ensure that children can attend school on a regular basis*
- d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment*
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development*
- f) avoid placing undue pressure on local infrastructure and services*

- g) *do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans*
- h) *reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.*

14. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.

- 3.7 Taking the above justification into account, the Council's view is that the existing sites where the 5 year need for private pitches would be met; and the proposed new sites at HGC where the need for public pitches would be met; should be considered to be available now, to offer a suitable location for development, and to be achievable with a realistic prospect that development will be delivered on the site within five years. As such, the Council considers that there will be a 5-year supply of deliverable pitches against the requirement.

Q4 What is the justification for the inclusion of pitches on sites at Hemel Garden Communities (South and Central)?² When and how are these sites going to be delivered? Are they justified and effective?

What is the justification for the inclusion of pitches on sites at Hemel Garden Communities (South and Central)?¹

- 4.1 Hemel Garden Communities (HGC) had been identified for a number of years as being the most suitable location for new Gypsy and Traveller sites in the District. As set out at HOU6 d) this is based on *"a variety of factors including proximity to the road network most used by Gypsies and Travellers, development site scale, area topography and landscaping opportunities, and the wide range of uses to be provided in the Broad Locations for development"*...
- 4.2 The scale and scope of the HGC project provides for opportunities to deliver a wide range of uses, including Gypsy and Traveller pitches, as part of the wider scheme. The suitability of HGC for the delivery of Gypsy and Traveller pitches has been identified throughout the inception and Masterplanning stages for the development of East Hemel Hempstead (for the land covered by Part B Sites H2, H3 and H4, essentially the land owned by The Crown Estate). This is evidenced via the following:

² Please also refer to Matter 6 relating to individual site allocations

- Hemel Garden Communities Charter November 2018, available via available via HGC 09.01 – ‘Link to Hemel Garden Communities Webpage’³ which states under ‘Principle 4: Vibrant Communities’ and subheading ‘Providing A Diversity Of Homes’:

Varied character areas will ensure a mix of dwelling sizes, tenures and types, including provision for self and custom-built homes, lifetime homes and genuinely affordable and starter homes, will provide great homes for people at all stages of life. Smaller sites for development will be made available to encourage diversity in design. This will respond to local needs which will change over time and also include opportunities for gypsy and traveller sites.

- HGC 04.03 - Framework Plan Technical Evidence Report (2024) states at 1.11:

The Framework Plan exercise is being undertaken in order to:

...

ii. Test the capacity of the site and any reasonable options to deliver up to 11,000 homes and around 10,000 jobs along with other relevant and/or emerging policy requirements...

iii. Prepare an Infrastructure Framework which quantifies the Growth Area infrastructure requirements and uses this to inform a viability assessment in order to establish whether the emerging policy requirements are viable and deliverable.

...

The Report lists under ‘Table 1: Summary of Policy Requirements’ and column ‘SADC Draft Local Plan Policies from 2023 / 2024 - key components’: “Gypsy and Traveller sites” “Between 30-40 pitches”. It also notes in the ‘Draft Scenario D Infrastructure Schedule (July 2024)’ column ‘Infrastructure Item’: “2 x 15 pitch gypsy and traveller sites”.

- The ‘Environmental Impact Assessment (EIA) Scoping Report East Hemel December 2024’ – submitted in support of EIA Scoping Opinion application 5/2024/2171⁴ – lists the delivery of the pitches as part of the draft description of development at 5.1.4 as follows: “The draft Description of Development for EIA purposes is as follows: “Outline application for:...land for up to 40 Gypsy and Traveller pitches...”. It also states at 5.1.7: “The Development would provide:... Land for up to 40 Gypsy and Traveller pitches;”
- SADC/ED12 ‘Statement of Common Ground between SADC and The Crown Estate’ (TCE) notes under Section 3 ‘Common ground’: “SADC and TCE

³ Direct link to HGC Charter 2018: <https://www.hemelgardencommunities.co.uk/media/adpohoaw/hemel-garden-communities-charter.pdf>

⁴ Application 5/2024/2171 documents available via: <https://planningapplications.stalbans.gov.uk/planning>; EIA Scoping Report document available via: <https://planningapplications.stalbans.gov.uk/w2webparts/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=10340525>

generally support what is set out in the Local Plan Part A, including the housing trajectory for Hemel Garden Communities. SADC and TCE generally support what is set out in the Local Plan Part B, including the Key Development Requirements for sites H2, H3 and H4.”

It is noted that the Key development requirements for Sites H3 and H4 include delivery of the Gypsy and Traveller pitches, at points 14 and 12 respectively.

N.B. As set out in SADC/ED85B and SADC/ED85C the aforementioned requirement at H3 is proposed to be separated out from the rest of requirement 14. This is for clarity and to correct a formatting error.

- 4.3 Please also refer to the Council's answers to Matter 6 Issue 9 Question 8 relating to individual site H3, and Matter 6 Issue 10 Question 8 relating to individual site H4.

When and how are these sites going to be delivered?

- 4.4 As set out in SADC/ED12 'Statement of Common Ground between SADC and The Crown Estate' the landowners TCE generally support the Key Development Requirements for sites H3 and H4, which include delivery of the 2no. 15-20 pitch sites. The planning application for this development is expected to be submitted in Autumn / Winter 2025 and the updated Housing Trajectory sets out that the first homes will realistically be completed in 2029/30. The Council's expectation is that delivery will include the 2 public site allocations by the end of the 2030/2031 period; within 5 years of expected adoption of the Plan.
- 4.5 These are intended to be delivered as serviced plots and managed as public sites. The Council has already had communication with both public and private bodies with regard to the management of the sites.

Are they justified and effective?

- 4.6 Yes, taking the above points into account, the allocations at Hemel Garden Communities (H3 and H4) are considered to be justified and effective.

Q5 What is the justification for Policy HOU6(b) and (c) and are they sufficiently clear enough to be effective?

- 5.1 Policy HOU6(b) and (c) are worded as follows:

To provide for the accommodation needs of Gypsies and Travellers and Travelling Show people the Council will:

...

b) Ensure that proposals make efficient use of land. Pitch sizes should not exceed 500m² and can be considerably less. Site design should be assessed in relation to

the specific circumstances of the site and in particular whether there is a need for integrated general amenity and landscaping space;

c) Take account of any additional criteria contained in Government guidance; and...

5.2 The 500m² maximum pitch size, and the subsequent site design requirements in HOU6 b), were informed by consideration of:

a) Relevant parts of the NPPF: There is a focus on making effective use of land and achieving appropriate densities throughout the NPPF, most particularly within Chapter 11 'Making effective use of land', and the 500m² limit is considered to adhere to this aim.

Relevant parts of national guidance: The PPTS sets out factors to consider in relation to provision of sites; Paragraphs 13, 14 and 26 of the PPTS are considered to be of most relevance in this regard. It is considered that the 500m² limit, and the subsequent site design requirements in b), are in line with the aims of this guidance. The aforementioned paragraphs read as follows:

13. Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community*
 - b) promote, in collaboration with commissioners of health services, access to appropriate health services*
 - c) ensure that children can attend school on a regular basis*
 - d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment*
 - e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development*
 - f) avoid placing undue pressure on local infrastructure and services*
 - g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans*
 - h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.*

14. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.

...

26. When considering applications, local planning authorities should attach weight to the following matters: a) effective use of previously developed (brownfield), untidy or derelict land b) sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness c) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community

- b) Other guidance in relation to site design referred to in the GTAA: The GTAA at paragraph 8.4 notes in relation to no longer extant Government guidance that: “the now withdrawn Government Guidance on Designing Gypsy and Traveller Sites recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.
- c) Other guidance: Welsh Government Guidance ‘Designing Gypsy and Traveller Sites’ 2015⁵, which contains site design guidance relating to: Size of site and layout, Site location, Roads, Boundaries, Pitch, Hardstanding, Amenity Block, Spacing of Caravans and Trailers.
Leeds City Council’s ‘Gypsy and Traveller Site Design Guide’ 2020⁶, which included a recommendation for an average pitch size of 320m², so as to provide space for an amenity block (kitchen, bathroom, living room) and touring caravan space for up to 2 caravans and 2 vehicles.
- d) Existing sites in the District: As set out in the Stage 1 Matter 1 Issue 6 Question 3 answer; two of the three public sites in the District have an average pitch size of c.320m²; and appear to offer sufficient space to enable a reasonable standard of accommodation for residents. The 500m² limit would be significantly in excess of this. Furthermore, the Proforma Assessment of existing Traveller Sites and sites put forward in the Call for Sites 2024 (appended to the Stage 1 Matter 1 Issue 6 Hearing Statement, available via Matter 1 - Issue 6.3 - Appendix 1); identified a range of average sizes of existing pitches, mostly (c.70%) below the proposed 500m² limit.

5.3 As such, the requirements in criterion b) relating to maximum pitch size and site design are informed by consideration of a number of relevant factors as set out above. Furthermore, the explicit reference to assessing proposals in relation to the specific circumstances of the site is considered to aid the effectiveness of the policy in practice; and the requirement to consider in site design whether there is a need for integrated general amenity and landscaping space seeks to lead to a higher quality environment and is informed by the policy and guidance listed above.

5.4 Where criterion c) states that the Council will “Take account of additional criteria contained in Government guidance” this should ensure consistency with up to date

⁵ Welsh Government Guidance ‘Designing Gypsy and Traveller Sites’ 2015 available via: <https://www.gov.wales/sites/default/files/publications/2019-03/designing-gypsy-and-traveller-sites.pdf>

⁶ Leeds City Council ‘Gypsy and Traveller Site Design Guide’ 2020 available via: <https://www.leeds.gov.uk/docs/Gypsy%20and%20Traveller%20Site%20Design%20Guide.pdf>

relevant and applicable guidance that would represent a material planning consideration; including new or updated guidance that will be published during the Plan period. As such it should provide clarity to applicants and others that this will be the case, and is considered to aid the effectiveness of the policy in practice.

- 5.5 Taking the above into account, it is considered that there is robust justification for Policy HOU6(b) and (c) and they are sufficiently clear enough to be effective.

Q6 What effect will the provision of new pitches have on the Chilterns Beechwoods SAC from allocations in the Plan and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

- 6.1 The effect of the provision of the new pitches at Hemel Garden Communities (HGC) (as set out in Part A Policy HOU6 d) and Part B Key development requirements for sites H3 and H4) on the Chilterns Beechwoods Special Area of Conservation (CBSAC); and the approach to mitigation; are considered in a similar way to the other residential development within the SAC Zone of Influence.

- 6.2 The Habitats Regulations Assessment 2024 (LPCD.04.01) (HRA) identifies in Section 5.3 'In Combination Assessment' that the allocations in Policy HOU6 could potentially result in linking impact pathways to the SAC and thus result in a Likely Significant Effect, as follows:

5.3.1 The Test of Likely Significant Effects for the LP Policies undertaken in Appendix B identified the following policies that could potentially result in a linking impact pathways to the SAC and thus result in a Likely Significant Effect:

...

• HOU6 – Gypsies, Travellers and Travelling Show People. This policy provides for accommodation of Gypsies, Travellers and Travelling Showpeople within the 12.6km core recreational ZOI [Zone of Influence]. Potential linking impact pathway(s): recreational pressure and atmospheric pollution.

- 6.3 The HRA also sets out in Section 6.1 'Recreational Pressure' paragraph 6.1.1 that these allocations are part of the suite of policies and allocations that "...all provide for new residential development within the 12.6km core recreational ZOI and as such could provide a linking impact pathway to Chilterns Beechwoods SAC via increased recreational pressure (in combination) as a result of increased population living in the new dwellings provided by the LP."

- 6.4 The HRA then goes on to consider the mitigation measures in the Draft Plan, as follows:

6.1.2 No further analysis is necessary or possible given the strategic work already undertaken. Rather the focus of appropriate assessment needs to be on mitigation in the form of the available SANG capacity and its provision.

6.1.3 Paragraph 10.8 of the LP acknowledges this issue. It states:

6.1.4 “10.8... A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.

6.1.5 All allocations that provide for new housing that are located within the 12.6km core recreational ZOI include text that acknowledges the relevance of the ZOI by stating “The site lies within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Appropriate contributions must be made towards the Strategic Access Management and Monitoring Strategy (SAMMS). Development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.”

6.1.6 In addition, suitable policy wording of the Local Plan is included within Strategic Policy SP10 to ensure that any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

6.1.7 Strategic Policy SP10 states: “The Council will support proposals that ensure the protection and improvement of the District’s green infrastructure and the wider natural environment, where the proposals:... ...f) Make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS), where the proposal is for additional housing within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Such development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere.

6.5 The HRA then goes on to consider the St Albans Strategic Mitigation Strategy, including the following:

6.1.11 St Albans DC has been working with Natural England and partner authorities (Buckinghamshire Council, Central Bedfordshire Council and Dacorum Borough Council) in preparing the Chilterns Beechwoods SAC Mitigation Strategy. As the landowner, the National Trust has also been involved. The agreed Mitigation Strategy comprises of two parts, the Strategic Access Management and Monitoring Strategy (SAMMS), and Suitable Alternative Natural Greenspace (SANG) provision. The SAMMS addresses issues within the SAC itself. The interventions required have been identified and agreed. A range of projects will be implemented over a period of at least 80 years, (2022/23 to 2102/2103) by the National Trust. To fund the SAMMS, each new home built located within the ZOI within St Albans are required to pay a tariff of £828.6146 (subject to change). The SANG provision will provide alternative natural greenspace for recreation to divert recreational activities away from the SAC. All new residential development within the ZOI must contribute towards either a) a

new (bespoke) SANG or b) contribute towards suitable SANG projects elsewhere; this is in addition to contributions towards the SAMMS. Larger developments (10 or more new homes) must provide their own suitable SANG that meets the guidance from Natural England. Smaller developments (1-9 homes) can contribute towards an existing SANG.

6.1.12 As previously detailed the SAMMS element of the Mitigation Strategy has been agreed by Natural England, which leaves only the SANG provision for the development planned by the St Albans Local Plan that requires further analysis. This is provided in the following paragraphs.

- 6.6 The HRA then goes on to consider SANG Provision to Support the Local Plan, including in relation to HGC and the view of Natural England as follows:

6.1.15 A Draft SANG Concept Plan (2023) has been created that identifies up to 277ha of potential SANG land, well in excess of the 211ha required. In a Discretionary Advice Service (DAS) response from Natural England (27th February 2023) regarding the proposed SANG, Natural England states "... that there is a good provision of SANG on-site, and we welcome that the Footprint Ecology standard for calculating SANG capacity of 8ha per 1,000 residents will be met from a pool of 276.5 ha potential SANG land, from which the required area (c.215ha) will be drawn down. Provision of SANG over and above the 8ha per 1,000 residents standard will always be accepted, and we welcome that any additional provision could provide capacity to other developments coming forward in and around Hemel Hempstead.

6.1.16 We view this as a good development site for SANG as the proposed areas have good proportions and enough space to accommodate circular walks with wide gaps in between footpaths. The fact that most of the SANG being proposed are arable land is a positive, as it allows greater flexibility for design of the open space...

6.1.17 ...if taken forward, these SANG would provide visitors with alternative destinations to the Chilterns Beechwoods SAC, with a concurrent positive impact on reducing visitor numbers to the SAC"...

6.1.18 The DAS response also identifies the need for the "habitats on these SANG should be established up front and ideally prior to the visitor facilities opening". The Council's housing trajectory document identifies that the first dwellings at the garden community are due to be completed in the year 2029/2030 (50 dwellings to be delivered at H2, and 50 dwellings at H4). The Council also expects sufficient SANG to be available and functioning within the Hemel Garden Communities by this time.

- 6.7 The HRA concludes:

7.1.5 The Local Plan contains suitable policy wording to ensure that any allocations and any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

7.1.6 Following an analysis of the current position relating to the availability, deliverability and timing of SANG provision in relation to the expected delivery time frames for residential development, it was concluded that, whilst not all allocations have a SANG strategy identified, those without a SANG solution in place are not to be occupied until at least year 6 of the Local Plan. The Council has confirmed that they are confident that appropriate SANG solutions will be delivered for all of the relevant sites within the Local Plan. This confidence is in part demonstrated by the Council's commitment to the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023⁵². It is considered that with the Chilterns Beechwood SAC Mitigation Strategy in place, and the Council's confidence to deliver SANG in a timely fashion, (acknowledging the excess SANG capacity at Hemel Garden Communities), that no adverse effects on the integrity of the Chilterns Beechwoods SAC would result.

6.8 It is considered that the potential effects of the new pitches at allocation sites H3 and H4 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result through provision of SANG onsite and contributions towards SAMMS.

6.9 This position is supported by Natural England, as set out in the Statement of Common Ground between SADC and Natural England (SADC/ED24), where it states:

Mitigating the impact of development on Chiltern Beechwoods SAC

- *12.6km Zone of Influence announced by Natural England where mitigation for new residential development will be required with SANGs and SAMMs.*
- *Strategic matter between:*
 - o *SADC*
 - o *Dacorum Borough Council*
 - o *Central Bedfordshire Council*
 - o *Buckinghamshire Council*
 - o *Natural England*

Conclusion

SADC and NE both support the approach in SADC's Regulation 19 draft Local Plan to mitigating the impact of development on the Chiltern Beechwoods SAC.

6.10 In developing the HGC Framework Plan (HGC 04.03 - Framework Plan Technical Evidence Report (2024), SANG provision and accommodation of SANG was an early consideration in the land use planning exercise. HGC 04.03 sets out:

3.12 The first Framework Plan indicated that in broad terms the Growth Area is capable of accommodating the level of planned growth. Subsequently it provided a vehicle for more extensive exploration of a number of issues. This included:

...

iv. Chiltern Beechwoods Special Area of Conservation (CBSAC) – in relation to planned growth, Natural England advised through the Habitat Regulations Assessment (HRA) that the CBSAC was experiencing damage due to high visitor numbers. The proposed Growth Area lies within the Zone of Influence of the CBSAC,

consequently, under the HRA it will be necessary for any development to mitigate its impact through the provision of SANG. As Suitable Alternative Natural Greenspace (SANG) will represent a considerable land take for a development of 11,000 homes, it became necessary for the Framework Plan to explore opportunities to accommodate this in addition to other types of public open space.

...

6.1 Collaborative working on the Framework Plan has generated a set of Spatial Principles which have informed the evolution of the draft Framework Plan over time and are expected to similarly inform masterplanning at the planning application stage.

...

10. SANG - The Growth Area will provide Suitable Alternative Natural Greenspace (SANG) to the Chiltern Beechwood's SAC. This will be delivered upfront to create an attractive destination of a minimum size of 8ha per 1000 population and meet the quality requirements set out in Natural England's guidance.

...

Chiltern Beechwoods and SANG Provision

7.2 The requirement to provide Suitable Alternative Natural Greenspace (SANG) to mitigate the impact of growth on the Chiltern Beechwoods Special Area of Conservation (CBSAC) represents a major consideration for the Growth Area. Through their Discretionary Advice Service (DAS), Natural England have confirmed that SANG should be planned for at a minimum rate of 8ha per 1,000 population. Utilising an average household size of 2.4 people, an 11,000 dwelling development would generate a requirement for 211 hectares of SANG – almost one quarter of the Growth Area.

7.3 Natural England has published criteria for SANG design, access and management with the intention of providing places which attract users and visitors instead of using nearby CBSAC. This includes providing for circular walks of at least 5km, areas which are suitable for dog walking, 'destination' SANG with additional facilities such as a café, good quality visitor infrastructure including clear footpaths and way-marking, and a semi-natural character.

7.4 Exploration of the SANG potential was undertaken through pro-active engagement with Natural England through their Discretionary Advice Service (DAS). Two site visits and two workshops were held as part of an iterative design process to identify suitable locations for different types of SANG.

7.5 Given the scale of the land area needed for SANG, additional land under the control of the four participating landowners/promoters, beyond the initial Growth Area boundary, was brought into consideration as part of this exercise, with the aim of securing appropriate levels of SANG.

7.6 The exercise concluded that it is possible to achieve 211 hectares of SANG on land under the control of the participating landowners (i.e. it can be regarded as

deliverable), selecting land from a larger 'area of search'. Based on the early concept planning, Natural England have provided positive confirmation of their 'in principle' support. Natural England have identified the Growth Area as an opportunity to deliver a wide variety of SANG spaces to meet varying needs, and to offer scope for innovation in view of the scale of the SANG opportunity, which is unique within England to date.

...

- 6.11 In the emerging planning application, through the Pre-Planning Application process, SANG requirements have been incorporated into the emerging plans. The applicants The Crown Estate (TCE) continue to engage with Natural England on the provision and requirements of the SANG. The 'Environmental Impact Assessment (EIA) Scoping Report East Hemel December 2024' – submitted in support of EIA Scoping Opinion application 5/2024/2171⁷ – states at 5.1.7: *"The Development would provide:... Provision of green infrastructure including provision of Suitable Alternative Natural Greenspace (SANG) and measures to achieve at least 10% Biodiversity Net Gain (BNG) as well as a country park, formal and informal open spaces, amenity spaces and ecological network links."*

- 6.12 The EIA Scoping Report also states at 7.2.22:

As the collection and analysis of baseline data is ongoing the mitigation will be developed in response to survey findings and iterative scheme design. The following main principles will be applied:

...

- *Creation of new country parks and wider networks of Suitable Alternative Natural Greenspaces (SANGs) to promote use of local and strategic greenspaces for wildlife and people;*

...

- 6.13 It should also be noted, as also set out above, that the Council's approach in this regard is supported by Natural England, as set out in the Statement of Common Ground between SADC and Natural England (SADC/ED24):

SADC and NE both support the approach in SADC's Regulation 19 draft Local Plan to mitigating the impact of development on the Chiltern Beechwoods SAC.

- 6.14 Taking the above into account, it is considered that the potential effects of the new pitches at allocation sites H3 and H4 on the CBSAC are suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result through provision of SANG onsite and contributions towards SAMMS. It is also noted that the Council's approach in this regard is supported by Natural England.

⁷ Application 5/2024/2171 documents available via: <https://planningapplications.stalbans.gov.uk/planning>; EIA Scoping Report document available via: <https://planningapplications.stalbans.gov.uk/w2webparts/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=10340525>

Q7 How would decision-makers be expected to respond to windfall development proposals?

- 7.1 Decision-makers would be expected to assess windfall development proposals against the criteria set out at HOU6 a), b) and c), other applicable Policies in the Local Plan (eg Green Belt, Landscape and Design), along with the relevant parts of the applicable NPPF and PPTS. This would be in the context of the proposed Main Modifications to add in to the reasoned justification for Policy HOU6 specific reference to the pitch and plot requirement and the strategy for how those needs will be met (set out in more detail in answer to Q1 above):

4.22 Evidence shows that there are future accommodation needs for Gypsies and Travellers over the Plan period. The Plan therefore provides additional accommodation opportunities which includes provision of new sites as well as potential redevelopment and expansion at existing sites through planning applications. For potential new sites, site suitability is affected by factors including proximity to the strategic road network, site size, the landscape and topography of the area, and availability of local services. These are set out in the Council's Gypsy and Traveller Accommodation Assessment Final Report 2024 (GTAA) and can be summarised as follows:

- Need for gypsy and traveller pitches to 2041 for households that meet the PPTS 2023 definition: 95 pitches*
- Need for travelling showpeople plots to 2041: 7 plots*

4.22A The Council seeks to meet the identified need for additional pitches at private sites primarily through the regularisation, intensification, reconfiguration or expansion of existing sites. The Council seeks to meet the identified need for additional pitches at public sites through the two specific allocations identified in Policy HOU6, at East Hemel Central and East Hemel South Broad Locations. The Plan therefore provides additional accommodation opportunities which includes provision of new sites as well as potential redevelopment and expansion at existing sites through planning applications.

- 7.2 There is reference in HOU6 a) i) to consideration of windfall development at 'New sites as part of Broad Locations for development that should accommodate a maximum of 20 pitches (each pitch being designed to accommodate 1 family / household)'.
- 7.3 Furthermore, windfall development at existing sites is explicitly taken into account in HOU6 a) ii and iii; where it states that the Council will consider proposals for new accommodation with regard to the potential and suitability of reconfiguring or extending existing sites; and sites with temporary permissions.
- 7.4 In addition, windfall development proposals at existing sites or at new sites would be assessed in accordance with HOU6 b) and c). These criteria relate, respectively, to matters of site design and to taking account of any additional criteria contained in Government guidance.

- 7.5 As set out in more detail above and elsewhere, the Council's position is that the identification of the two specific allocations identified in Policy HOU6 plus the approach of regularisation, intensification or expansion at existing sites will be adequate to meet the District's requirements; and although additional windfall would be considered in line with Policy HOU6 and other local and national policy, additional windfall development is not required in order to meet the accommodation requirements.