

Leader of the Council

Please reply to:

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Date: 21 October 2022

Simon Clarke – Secretary of State for Levelling Up, Housing and Communities
Department of Levelling Up, Housing and Communities
2 Marsham Street
LONDON
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Dear Simon

Delivering Growth and new homes – clarity needed regarding the Government's 'Standard Method' for calculating local housing need

St Albans City & District Council is working towards a new Local Plan that seeks to deliver Growth, new homes, jobs, infrastructure, environmental enhancements and an appropriate response to the Climate Crisis. We recognise that our current Plan is the second oldest in the country and are therefore in regular contact with your officials and also use the Planning Advisory Service and other organisations to assist us with the development of a new Plan.

A significant issue in the preparation of the new Plan is the Government's current position with regard to the 'Standard Method' for calculating local housing need. I am sure that by now you will have been advised of the considerable blockage that this approach is causing across England and most particularly in areas like St Albans that are wholly within the Metropolitan Green Belt.

The impact of the Government's 'Standard Method' is that it effectively requires St Albans to plan for the building of approximately 10,000+ houses in the Metropolitan Green Belt over a 15 year Plan period. We are leaving no stone unturned in maximising potential delivery of homes outside of the Green Belt, but there is nowhere near enough land. We are working closely with our neighbouring and nearby Councils on these issues, but they are all either wholly or largely within the Metropolitan Green Belt as well, with limited urban land. There is currently no reasonable prospect of them providing for the housing needs of this district as defined by the 'Standard Method'.

The wording of the National Planning Policy Framework at paragraph 61 does provide a theoretical way around this issue – “unless exceptional circumstances justify an alternative approach” - but in practice it is clear from the approach of the Planning Inspectorate at our own previous and multiple other Local Plan Examinations that currently this is merely a theoretical avenue, for Councils in circumstances like our own.

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A point of note is that the Government's 'Standard Method' relies upon old data. The Government requires the use of household projection data from the 2014-based Office for National Statistics (ONS) household projections. This 2014 data reflected effectively a one-off 'spike' in household projections for this District and the more recent data is very different, as can be seen in the table below:

ONS household projection	Base year	Time period for household projection calculation	Households projected
2014-based	2021	2021-2031	637
2016-based	2021	2021-2031	436
2018-based	2021	2021-2031	223

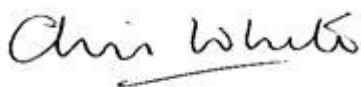
The use of the more recent 2018-based household projections would enable St Albans and many other Councils, particularly within the Metropolitan Green Belt, to deliver new Local Plans, new homes and growth more quickly. The forthcoming new household projections due to be released by ONS in early 2023, based on the 2021 Census data, will be even more accurate in due course.

Lastly, the considerable uncertainty that has been created by statements from members of the Government over time, regarding 'protection of the Green Belt' and as a consequence for Councils how that should be interpreted with regard to the 'Standard Method', impacts greatly on residents and stakeholders. The Planning Inspectorate has made clear that they give no regard to such pronouncements, but inevitably this does cause considerable confusion for everyone. An update to the Standard Method approach and how it should be addressed where it potentially affects Green Belt land would give clarity to all.

The changes needed would not require new legislation or a parliamentary vote. It is a matter of a relatively straightforward update to relevant national guidance.

I would welcome the opportunity to discuss these matters in person, as I know would many Council Leaders across Hertfordshire and the wider area across the Metropolitan Green Belt.

Yours sincerely



Councillor Chris White
Leader of the Council
St Albans City & District Council