

The Rt Hon Sajid Javid MP
Secretary of State for Housing, Communities and
Local Government
House of Commons
London
SW1A 0AA

30 January 2018

Local Plan Intervention

Dear Sajid,

Thank you for your letter dated 16 November 2017.

St Albans City and District Council (SADC) will make the challenging decisions needed to build more homes and have an up to date adopted Local Plan. Since the Strategic Local Plan (SLP) failed at an Initial Hearing Session and our legal challenge ended in July 2017, SADC has been actively working in an accelerated process to develop a Plan in partnership with neighbouring councils.

SADC currently has approximately 60,000 dwellings, is 81% Green Belt and has been building new dwellings at an average rate of 360 per year over the last 15 years.

I set out below the reasons why we have failed to produce an up to date Local Plan, the current status and plan to adopt a new Local Plan at the earliest opportunity.

The 2011 draft Local Plan failed to get agreement from Full Council in 2012. The key requirement from Council was to complete an independent Green Belt review. This was subsequently done and a revised Plan developed. This included 4 broad locations releasing Green Belt for development that would deliver circa 4,000 new dwellings to supplement the 5,000 new dwellings that could be delivered through densification and commercial to residential conversion. There is very limited brownfield land within the District. This second Plan (SLP) was completed and submitted for independent examination. However, the appointed inspector found that SADC had failed in its Duty to Cooperate (DtC).

The key representations were from four neighbouring authorities - Hertsmere, Dacorum, Three Rivers and Watford, jointly called the South West Herts Group (SWHG). The fundamental reason for their objection under the DtC was because they wished us to join their Group and be part of a Common Housing Market and Functional Economic Area.

SADC progressed a judicial review of the inspector's decision but the original findings of the inspector were upheld in a judgment issued in July 2017.

Immediately following this decision SADC commenced preparation of a new Plan and published a Local Development Scheme in November 2017. The LDS set out a Regulation 18 consultation commencing 6 January 2018. This has been achieved. Regulation 19 publication is scheduled in September to October 2018 with final submission to the Planning Inspectorate by March 2019.

Using updated published analysis in November 2017, a five authority South West Herts Housing and Functioning Economic Market Area has been agreed by this Council. The councils within it are St Albans, Hertsmere, Dacorum, Three Rivers and Watford. Herts County Council is also a supporting member of the group. SADC resolved to join this group in November 2017 and is actively supporting joint strategic and collaborative working at leader, portfolio holder and officer level. A Memorandum of Understanding (MoU) and a Statement of Common Ground (SOCG) are in preparation with a view to creating an overarching Joint Strategic Plan supported by individual Local Plans. This builds on the work to date completed by the SWHG.

SADC has been working for some time with Dacorum, Herts County Council and the Local Economic Partnership on an "Envirotech Enterprise Zone" straddling both districts and largely within the Green Belt. This will provide space for up to 800 companies and 8,000 jobs. A MoU has been agreed by government and construction of part of the site commenced in December 2017. This is a tangible example of successful collaborative working delivering development to meet identified need.

In progressing the Regulation 18 consultation and plan preparation, SADC is using the 'standard methodology' housing number requirement estimate (currently in consultation) of 913 dwellings per year. This is substantially above the current rate of build (360 per year) and the previously submitted SLP that had 436 dwellings per year.

We plan to take forward all reasonable and deliverable non-Green Belt housing options, to provide about 35% (5,000) of homes in 2020-2036. To deliver 913 homes per annum would require approximately 65% (9-10,000) of new homes on currently Green Belt, green field land over 2020-2036. Overall, this represents a 25% growth in housing in the District.

We have made considerable efforts to address issues jointly with the South West Herts Authorities. The fact that all five LPAs agreed at a joint Council Leader, Portfolio Holder and Chief Executive meeting on 23 January 2018 to support St Albans in our efforts to get a new Local Plan in place attests to the progress made. At a meeting of the Hertfordshire Infrastructure and Planning Partnership

on 15 January 2018, all 10 LPAs and Hertfordshire County Council also agreed to support St Albans in our efforts to get a new Local Plan in place.

We have an experienced and stable spatial planning team supporting delivery of the Local Plan and have made the necessary budget provision to fully support this.

We have much of the required evidence base already prepared from our previous SLP to support the new Local Plan, including:

1. Green Belt review
2. Strategic Housing Land Availability Assessment
3. Economic Development and Employment Land Report

My officers have been liaising closely with your officials in recent months and are committed to doing so for the foreseeable future. We are also taking every reasonable opportunity to accelerate our Plan through engagement with other bodies including through the Planning Officers Society. For example, we are arranging an officer advisory visit from the Planning Inspectorate. We are also a pilot authority working with the Planning Advisory Service (also with MHCLG support) on Housing Delivery Action Plans. In terms of the wider related Government agenda, we published our Brownfield Register on time in December 2017 and have an active Self-build Register.

We are actively supporting the creation of Neighbourhood Plans across the District, and they are progressing well. In total, we have supported 7 out of our 9 Parish/Town Councils in successfully achieving Neighbourhood Plan area designation, covering approximately 80% of the District. They are now all at or progressing towards Regulation 14 stage. Harpenden Neighbourhood Plan (Regulation 14) consultation ran until 6th December 2017. Redbourn Neighbourhood Plan is currently out to (Regulation 14) consultation till 16 February 2018.

I was elected Leader of SADC in May 2017 and I have appointed a new Planning Portfolio Holder to our Cabinet. The Local Plan is one of our priority projects and has my full commitment to work with residents, neighbouring authorities, businesses and other stakeholders in delivering the plan to the published LDS schedule.

How The Government Can Help Us Deliver A New Local Plan And More Homes

As you will be aware, Local Plan work is challenging, complex and expensive. As outlined above, we are making every reasonable effort to make swift progress.

As well as the measures we are undertaking, we make the following requests of MHCLG to help us deliver a new Local Plan and more homes:

1. NPPF Draft and Final Updates as early as possible in 2018 (draft preferably by March and final by May) – to give direction and clarity, at the earliest possible time, on the balance between meeting housing need and Green Belt restraint.
2. NPPF Draft and Final Updates to respond positively and as soon as possible to the concerns raised by many, including St Albans, regarding the ‘standard methodology’.
3. Funding our Planning Delivery Fund bids – SADC has made two bids jointly with adjoining authorities for funding to accelerate Plan-making and housing delivery (1) As a 5 LPA SWHG with the Hertfordshire Local Economic Partnership bid via the Joint Working Fund route (2) With Dacorum Council and the Hertfordshire LEP via the Facilitating Good Design in Major Developments route .
4. Funding for Infrastructure – in particular for transport and education.

Conclusion

The Council has quickly and proactively moved forward on producing a new Local Plan and on working jointly with its neighbouring Councils. As such the Council believes that it is the best body to progress a new Plan swiftly.

Sincerely



Alec Campbell
Leader of St Albans City and District Council

CC Anne Main MP
CC Bim Afolami MP

Enc.

Appendix 1 – Anne Main MP Local Plan response

Appendix 2 – Bim Afolami MP letter

Appendix 3 – Planning Strategically in South West Hertfordshire

Appendix 4 – SADC response to ‘Planning for the right homes’ consultation