

St. Albans City & District Local Plan Examination Matters, Issues & Questions

Response to Matter 5 on Behalf of Canton Ltd

December 2019



Woods Hardwick
Architecture | Engineering | Planning | Surveying

Issue - Objectively Assessed Needs for Housing and Employment Land (Policies S4 & S5)

Q4. *Is the stepped trajectory in Policy S4 and appendix 2 of the Plan appropriate and justified?*

- 4.1 The stepped trajectory arises from the Council's ambition for the Broad Locations to realize their development potential and bring forward housing. Larger development proposals, in comparison to smaller schemes, spend a greater amount of time from planning application submission to delivery of the first dwelling. Furthermore, it must also be taken into account that larger sites do not, by comparison, have proportionally larger build-out rates than smaller sites.
- 4.2 Specifically, the Nathaniel Lichfield & Partners' '*Start to Finish*' report investigates average lead-in times and build out rates of large sites and supports the above. Of the Broad Locations, there are only two sites with a lead-in time of four years, and three with less than 5 years. It is evident, then, that the stepped trajectory is derived from the spatial strategy which has at its heart the Broad Locations for growth. Furthermore, the build out rates are estimated to be as low as 60 dwellings per year for the Broad Locations with a minimum housing provision of less than 500, to no more than approximately 160 dwellings per year on average for the Broad Locations with a minimum housing provision of over 2,000. As the report indicates, the larger sites would not provide for at least four times the build-out rate per year despite requiring four times the minimum number of housing to come forward. This is demonstrated in the predicted build-out rates for the District, as above, where sites with four times the minimum allocation do not even have at least triple the build-out rate.
- 4.3 The above puts into context what should be considered appropriate and justified for the stepped trajectory if Broad Locations remain the only allocated sites within the plan (with the exception of the small and medium sites with existing consent that have been deemed to be allocated during the emergence of this Local Plan). A close look at appendix 2 of the Plan depicts the Broad Locations of East St. Albans, North St. Albans, and North West Harpenden as having a quicker lead-in time of 1-2 years than what the '*Start to Finish*' report indicates would be appropriate for development of the required scale. Any optimistic approach to lead-in times, and indeed build out-rates as discussed below, would be highly detrimental to the already low trajectory for the first five years of the plan period.
- 4.4 Insofar as build-out rates are concerned:
- Park Street Garden Village is projected to provide, at its best, 180 completions per year from 2028/29 until at least until the end of the plan period; however, this exceeds the more appropriate, and indeed justified, figure of 160 dwellings per annum in the report.
 - The case is similar for the East Hemel Hempstead (North) Broad Location from 2025/26 to 2030/31, and East Hemel Hempstead (South) from 2025/26 onwards where, at their best, 180 completions per year are anticipated against more realistic figures of 135 and 160 dwellings per annum, respectively.
 - North West Harpenden is stipulated to have its highest build-out rate of 75 completions per year from 2022/23 to 2028/29, whilst the more appropriate and justified figure of 65 dwellings per annum as per the report indicates this is also ambitious.

- North St. Albans is projected to have, at its best, 120 completions per year from 2023/24 to 2029/30, whereas 105 dwellings per annum is more realistic - again, as per the report.
- North East Harpenden is estimated to have at least 75 completions per year from 2026/27 onwards as compared to 65 dwellings per annum which is the more appropriate and justified figure.
- The Broad Locations West of London Colney and Chiswell Green are projected to have 75 completions, at their best, from 2025/26 to 2029/30 and 2024/25 to 2027/28, against the realistic 60 dwellings per annum for sites with the Council's predetermined minimum.

4.5 It is eminently clear the Council has been far more optimistic in build-out rates as compared to lead-in times for the Broad Locations. There is little justification for these completions put forward by the Council, whereas the figures in the aforementioned report are justified by research and real world cases and are, therefore, appropriate. For ease of convenience, the overall overestimations by the Council in build-out rates for the above sum to 960 total completions over the plan period, which may have a highly detrimental impact on its ability to sustain an adequate housing supply.

4.6 It follows, then, that the trajectory cannot be appropriate nor justified, stepped or otherwise. The lead-in times and build-out rates of the Broad Locations are overly optimistic as a whole, do not meet the minimum housing requirement for the plan period. The lack of small and medium site exacerbates the situations as any complications or delays for development in Broad Locations will have profound consequences for the Council's housing land supply over the plan period.

4.7 The NPPG supports this position in stipulating *that "if longer-term sites are to be included, for example as part of a stepped requirement, then plan-makers will need to demonstrate that there is a reasonable prospect that they are likely to come forward within the timescale envisaged"*. On the matter of what constitutes reasonable prospects, the NPPG continues to state that *"in demonstrating that there is a 'reasonable prospect' plan-makers can use evidence such as (but not exclusively):*

- *Written commitment or agreement that relevant funding is likely to come forward within the timescale indicated, such as an award of grant funding;*
- *written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
- *likely buildout rates based on sites with similar characteristics; and*
- *current planning status - for example, a larger scale site with only outline permission where there is supporting evidence that the site is suitable and available, may indicate development could be completed within the next 6-10 years"*.

4.8 Evidence from likely buildout rates based on sites with similar characteristics have been provided above as per the 'Start to Finish' report which indicate there is no such reasonable prospect these sites will be developable within the plan period. No evidence from the LPA has been provided to suggest that relevant funding is likely to come forward within the timescales indicated nor agreement between the LPA and site developer(s) which confirm anticipated start and build-out rates set out in appendix 2.

- 4.9 All of the above reinforces the critical need to include some smaller and medium sized allocations into the Plan to provide shorter term delivery early in the Plan period. Without this the Plan cannot be considered an appropriate strategy, taking into account the reasonable alternatives.
- Q6. ***Have the Council set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations, as set out in paragraph 65 of the NPPF?***
- 6.1 The LPA has not set out any housing requirement for any designated neighbourhood area, nor does there appear to be scope to do so given the restrictive nature of the spatial strategy and lack of developable land to be released from the Green Belt that would facilitate meaningful neighbourhood growth. It is considered that spatial strategy conflicts with the objectives set out in Paragraph 65 of the NPPF; certainly, if the spatial strategy inhibits growth in Green Belt settlements via growth potential and developable land, this reduces the scope for creating neighbourhood plans. Any attempt to adequately facilitate neighbourhood areas in realizing development would require, by implication, a less restrictive spatial strategy which, in turn, would see the introduction of suitable housing requirement figures for these areas.

