

MATTER 5: OAHN

St Albans Local Plan Examination in Public Hearings

SUBMITTED ON BEHALF OF STACKBOURNE LIMITED

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1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of Stackbourne Ltd, the freeholder and promoter for land at Smallford Works, Smallford.
- 1.2 This Statement is made in response to the published 'Matters, Issues and Questions'. This Statement covers those questions posed within Matter 5 – Objectively Assessed Needs for Housing and Employment Land (Policies S4 & S5).
- 1.3 Stackbourne Ltd has submitted an outline application (Ref: 5/2019/3022) for up to 100 dwellings for land at Smallford Works, demonstrating that there are no technical constraints to the delivery of the site, the principle of residential development for up to 100 dwellings can be considered acceptable when assessed against the policies of the NPPF, and there are significant benefits that would result from its redevelopment, including:
- Environmental enhancements from the clean-up of intensive industrial uses to that of residential, including a significant increase in green infrastructure;
 - Fewer overall trips at peak AM, PM and throughout the day compared to the existing use, including the removal of a significant number of HGV trips throughout the day; and
 - The provision of much needed market and affordable housing in an area of historic significant shortfall in housing delivery and some of the worst affordability for local residents in the country.
- 1.4 This Hearing Statement raises concerns with the assessment process the Council has taken in forming its objectively assessed housing need (OAHN) and housing requirement, namely:
- The starting point for the Plan period in the context of its housing need assessment;
 - The unjustified extent of use of a stepped trajectory in meeting housing need over the Plan period.

2 OBJECTIVELY ASSESSED NEED FOR HOUSING

Q1. The identified housing need is based on the standard methodology in the National Planning Policy Framework. Is the Council's application of this in accordance with the methodology in the PPG (as updated)?

- 2.1 The Council's approach to housing need is unsound in the context of the proposed Plan Period ('2020-2036') as proposed in Policy S4.
- 2.2 The figure of 913 dwellings per annum (dpa) has been derived from the indicative standard methodology assessment, published by MHCLG on 14th September 2019, assisting the consultation document *"Planning for the right homes in the right places"*. It uses affordability ratios for 2016, and average household growth over the period 2016 to 2026 from the 2014 based household projections.
- 2.3 The PPG Housing Need Assessment states¹ that in setting the baseline the most recent national household growth projections, for the local authority are used, *"this should be 10 consecutive years, with the current year being the first year"*. Consequently, the start point of the projections should correspond with the start of the Plan period and vis a vis.
- 2.4 The PPG goes on to state *"local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination."*² With the housing need figure based on a 2016 base-date, it cannot be considered a sound starting point.

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

- 2.5 National guidance³ makes allowance for a stepped trajectory where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. It is appreciated that the Council will experience a large jump in housing requirement and proposes a number of strategic sites. However, this needs to be balanced against the acute affordability crisis within the District, and the appropriateness for such a reliance on strategic sites.

¹ PPG Reference ID: 2a-004-20190220

² PPG Reference ID: 2a-008-20190220

³ PPG Reference ID: 68-021-20190722

2.6 The PPG goes on to state “Where there is evidence to support a prioritisation of sites, local authorities may wish to identify priority sites which can be delivered earlier in the plan period, such as those on brownfield land and where there is supporting infrastructure in place e.g. transport hubs. These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement.” [our emphasis]

2.7 It stands to reason that where there are available, deliverable sites, particularly PDL, the Council should identify these as site allocations in order to boost delivery within the first five years of the Plan period. Smallford Works is an example of a brownfield site that has been overlooked throughout the production of the Local Plan.

2.8 Furthermore, the standard methodology already applies a cap to ensure that local housing need remains at a deliverable level for a local authority. The PPG states:

The standard method may identify a minimum local housing need figure that is significantly higher than the number of homes currently being planned for. The cap is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible.

The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible.

Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered. This may help prevent authorities from having to undertake an early review of the relevant policies.

Reference ID: 2a-007-20190220

2.9 Uncapped, the Local Housing Need figure for St Albans increases to approximately 985 dpa.

2.10 St Albans has experience an average of just 0.71% stock growth per annum since 2001, whilst experiencing a current affordability ratio of 16.59. Compare this to some of the local authorities in the below table who have experienced significantly higher stock growths, despite having a significantly lower median house price to earnings ratio.

Local Authority	Stock Growth	Affordability Ratio
Vale of White Horse	2.5%	9.5

Dartford	2.3%	8.9
Uttlesford	2%	11.8
Stratford-on-Avon	2%	10
Cherwell	2%	9.8
N.W Leicestershire	2%	7
Cambridge	2%	13
Daventry	1.9%	9.6

- 2.11 This evidence demonstrates that we consider the Council should have the market capacity to deliver a significantly higher housing figure than is currently sought in the Plan.
- 2.12 Applying a stock based approach of 2% to St Albans would result in an annual requirement of 1,208 dwellings. Whilst we are not advocating a stock based approach to calculating housing need, it demonstrates that the reason that supply has been suppressed so significantly is purely due to the failure of the Council to produce a new Local Plan, there is no reason the market could not deliver a higher level, early in the Plan period.
- 2.13 A similar stepped trajectory has recently been tested during the Examination to the Guildford Borough Council Local Plan. St Albans is similar to Guildford as it has experienced significant and sustained under-delivery of housing over a number of years in an administrative area that is heavily constrained by Green Belt. However, the situation is arguably far worse in St Albans, which has a median workplace-based affordability ratio of 16.59 versus 12.53 in Guildford. This renders St Albans as one of the least affordable places to live in the UK and creates significant and damaging social division in the community.
- 2.14 At the Examination to the Guildford Plan, the Inspector recognised that the proposed stepped trajectory would not deliver sufficient homes early enough to counter worsening affordability trends and their damaging social and economic effects. Furthermore, if the stepped trajectory is applied, it would entirely negate the purpose of a 20% buffer which seeks to address under-delivery, and would be contrary to national policy to significantly and demonstrably boost the supply of housing.
- 2.15 Whilst it is appreciated the Plan seeks to rely on delivery from a number of large, strategic sites, these are entirely reliant on strategic infrastructure that is outside of the Council's control. Furthermore, the decision of the Council to rely on these sites is not one that is required in the presence of available alternatives. Land at Smallford Works is one such site that is available, developable and deliverable within the early years of the Plan. It would make efficient and effective

use of PDL in accordance with the NPPF and adhere with the principles of sustainable development.

- 2.16 The proposed use of a stepped trajectory means the Plan cannot be considered positively prepared, or possible of being found sound at Examination.