



# **NORTH HEMEL HEMPSTEAD BROAD LOCATION: STATEMENT IN RESPONSE TO INSPECTOR'S MATTERS, ISSUES & QUESTIONS**

**MATTER 5 (HOUSING)**

# Contents

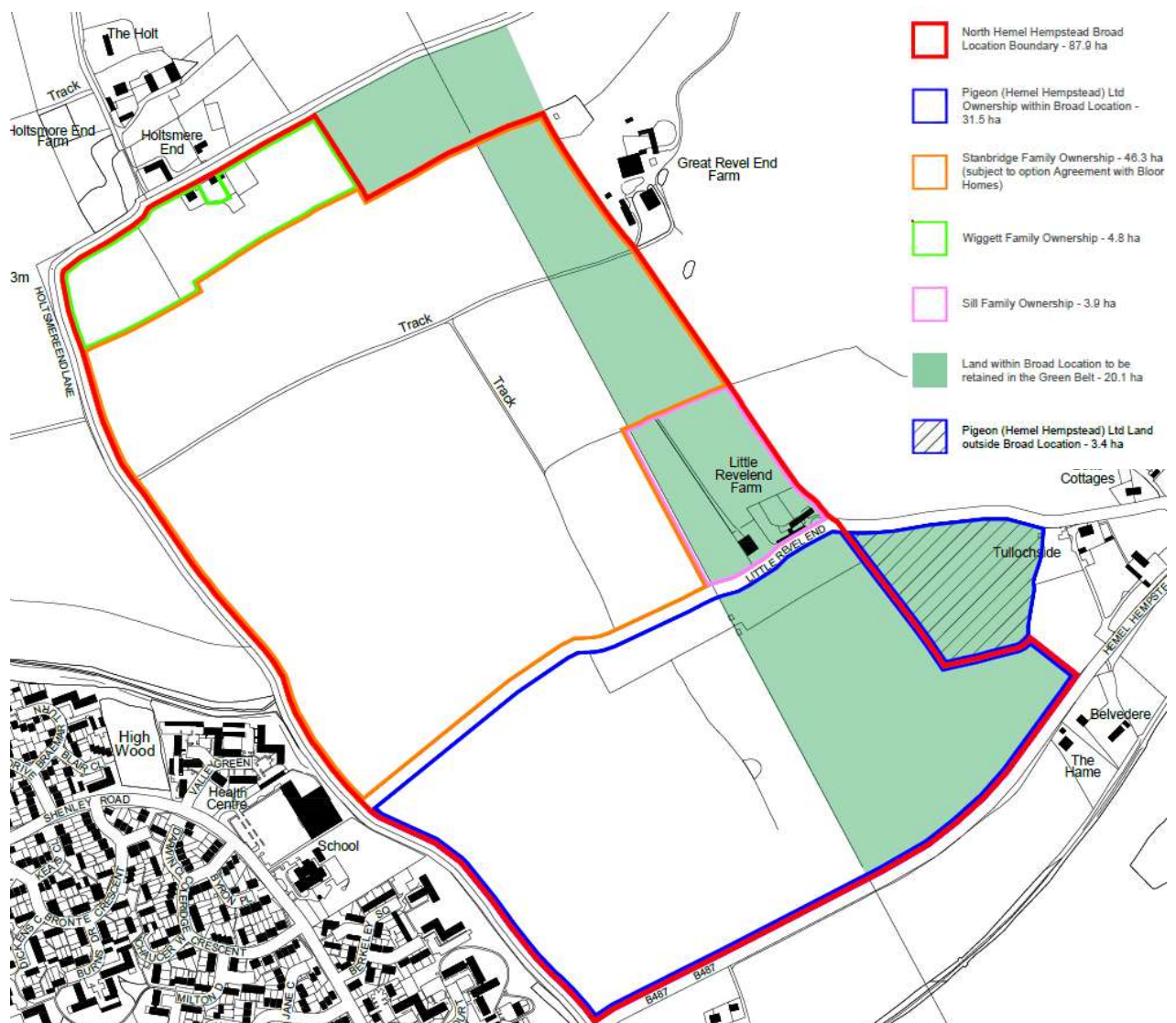
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# 1 Introduction

- 1.1 This Statement is submitted on behalf of Pigeon Investment Management Ltd on behalf of Pigeon Hemel Hempstead Ltd (Pigeon) in response to the Inspectors' Matters, Issues and Questions for the St Albans City & District Council (SADC) Local Plan Examination.
- 1.2 Pigeon Hemel Hempstead Ltd is the freehold landowner of the southern part of the North Hemel Hempstead Broad Location site, as identified in the St Albans Publication Draft Local Plan (Policy S6 iv), and as shown in Figure 1. This Statement follows on from previous representations, which were submitted by the former landowners throughout the plan-making process (Local Plan Representor reference no. 1157883).
- 1.3 Pigeon Hemel Hempstead Ltd is promoting the whole Broad Location for development, working in conjunction with neighbouring landowners, both within the North Hemel Hempstead Broad Location and the surrounding Broad Location's. This Statement assists with providing information on the deliverability of the site in response to the Inspector's Matters, Issues and Questions.

*Figure 1: Site Plan of North Hemel Hempstead Broad Location*



## 2 Matter 5 (Housing)

1. *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 No comment.

2. *Are any starting point LHN adjustments necessary?*

2.2 No comment

3. *Is the housing target in the Plan appropriately aligned with forecasts for jobs growth?*

2.3 No comment.

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

2.4 No, the stepped trajectory in Policy S4 and appendix 2 is not appropriate nor is it justified.

2.5 Policy S4 sets a requirement for at least 14,608 dwellings to be delivered over the 16 year plan period (2020-2036), which equates to an average of 913 dwellings per annum (dpa). Policy S4 splits this housing requirement into three time periods, with a considerably reduced target of 565 dpa for the first five years of the plan period (2020-2025). This increases to 1,075 dpa for the following two time periods (2025-2030 and 2030-2036).

2.6 A Housing Trajectory is included within Appendix 2 of the Local Plan and outlines when the Council anticipates sites to start delivering dwellings in accordance with the proposed stepped housing requirement. In line with the stepped requirement, the Housing Trajectory currently anticipates the North Hemel Hempstead Broad Location to start delivering dwellings in 2031/32, which is 11 - 12 years into the plan period.

2.7 The first paragraph of Policy S4 states that the reason for the stepped requirement is to reflect "realistic rates of delivery of both the required infrastructure and the homes". SADC do not provide any further explanation on this.

2.8 Whilst recognising that the larger scale developments in the form of Broad Locations proposed in the Plan do have a lead-in time, we believe that the stepped trajectory in the manner illustrated in Appendix 2 of the Local Plan does not accord with the Government's objective to significantly boost housing supply (paragraph 57 of the NPPF) and is not in line with the NPPG. Paragraph 21 of the NPPG states:

*"a stepped requirement may be appropriate 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. Strategic policy-makers will need to **set out evidence to support using stepped requirement figures**, and not **seek to unnecessarily delay meeting identified development needs**" (22 July 2019, Reference ID: 68-021-20190722).*

2.9 SADC have not provided supporting evidence to justify the use of a stepped requirement and trajectory. Furthermore, the NPPG is clear that a stepped trajectory should not be used to delay development coming forward and we are of the view there is considerable evidence to justify that the stepped approach is not appropriate.

- 2.10 There is clear evidence that there is an urgent need for an increase in housing delivery within the District and therefore there is no purpose in delaying development unnecessarily. Based on the latest median affordability ratio (2018) published by the Office of National Statistics, SADC is the 12<sup>th</sup> least affordable region to live in England and Wales and the 4<sup>th</sup> least affordable region outside of London<sup>1</sup>.
- 2.11 Affordability in SADC is also worsening. The SHMA (January 2016), which is an important evidence base document for the Local Plan, states at paragraph 6.41 that SADC had the highest median affordability ratio in the Housing Market Area in 2013 (comprising the local authorities of SADC, Dacorum, Hertsmere, Three Rivers and Watford) with a ratio of 13.3. The latest median affordability ratio (2018) for SADC is 16.81.
- 2.12 This worsening of affordability has not been reflected by SADC in Policy S4 or appendix 2. Therefore, there is no basis for SADC to defer the commencement of development of the North Hemel Hempstead Broad Location until 11 years into the plan period. This delay does not address the significant and worsening housing affordability problem within the District.
- 2.13 MHCLG Planning Practice Guidance for the preparation of Housing and Economic Land Availability Assessments, updated in 2019, advises at paragraph 7 that the Council's land availability evidence base should be the product of discussions with, amongst others, developers and those with land interests.
- 2.14 In our detailed response under Matter 7, we provide evidence which demonstrates that the North Hemel Hempstead Broad Location can be delivered earlier than 2031/32. This proves that the need for a stepped trajectory should be revised. The appended Vision and Delivery Statement to Matter 7 states that the North Hemel Hempstead Broad Location can start delivering dwellings in 2026/27.
- 2.15 Advancing the delivery of the North Hemel Hempstead Broad Location will also bring about additional important benefits. This Broad Location is located at a pivotal point as a principal launch site for the emerging proposal for a spine road which is necessary to unlock the full scale of development to the east and north of Hemel Hempstead.
- 2.16 Pigeon will continue to work co-operatively with SADC, however, we strongly believe that the stepped trajectory in Policy S4 and appendix 2 is not appropriate nor is the associated delay in the delivery of the North Hemel Hempstead Broad Location justified. As demonstrated through technical evidence base studies, commissioned by Pigeon, the trajectory should be revised to bring forward the delivery of the North Hemel Hempstead Broad Location to earlier in the Plan Period in order that the Site can more effectively assist in increasing housing delivery and addressing housing affordability issues within the District.

#### *5. How much housing is anticipated after the plan period as a result of the proposals in the Local Plan?*

- 2.17 The Housing Trajectory within Appendix 2 of the Local Plan anticipates 3,760 dwellings to be delivered after the plan period as a result of the proposals in the Local Plan. This is distributed as follows:
- North Hemel Hempstead – 1,000 dwellings;
  - East Hemel Hempstead South – 205 dwellings;
  - Park Street Garden Village – 630 dwellings; and

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<sup>1</sup> Median affordability ratio (2018)

<https://www.ons.gov.uk/visualisations/dvc603/beeswarm/multiplebeeswarms/regionalratiosdata.xls>

- LP/NPPF – Delivering Urban Optimisation (intensification/conversion of employment land, Council owned sites and increased density in higher buildings) – 1,835 dwellings.

2.18 However, there is scope for some of this growth to be brought forward to address any shortfalls SADC may have in meeting its housing requirement.

2.19 It should also be noted that SADC has a substantial backlog of unmet housing need. For example, SADC delivered 385 dwellings during 2017/18 compared to the MHCLG figure of 902, which was calculated using the standard methodology.

2.20 As noted in previous representations (Local Plan Representor reference no. 1157883) submitted during the St Albans Local Plan Publication 2018 Consultation, and as per our response to Question 4 in this Statement, the North Hemel Hempstead Broad Location is capable of delivering dwellings earlier than 2031/32 as currently projected.

2.21 Overall, there is no reason why the development of the North Hemel Hempstead Broad Location should be artificially deferred. The earlier delivery of the North Hemel Hempstead Broad Location will make a significant contribution to address the worsening housing affordability and substantial backlog of unmet housing need in SADC.

*6. 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?*

2.22 No comment.

*7. Have the Council carried out an assessment, as required by S.8 of the housing act 1985, of the needs of people in the district residing in caravans or houseboats?*

2.23 No comment.