

Hearing Statement in Relation to the Independent Examination of The St Albans Local Plan

Matter 5 - Objectively Assessed Needs for Housing and Employment Land (Policies S4 & S5)

STATEMENT ON BEHALF OF CP HOLDINGS LTD (ID 1158145)

- 1.1 WYG is responding to the Inspector's questions raised under Matter 5 – Objectively Assessed Needs for Housing and Employment Land.
- 1.2 WYG is representing CP Holdings Ltd, who is the owner of a large site adjacent to the boundary of the St Albans built up area. The site corresponds to a southern section of Green Belt Assessment Site GB24B – as per the site plan appended to this statement. Roads and development form a hard boundary on every side. The total site area available ultimately is approximately 137ha but it is capable of being apportioned into phased smaller to medium sized sites. It is easily accessible to local facilities (Abbey Avenue local parade 400m away; Waitrose 1km away; Prae Wood Primary School 800m away). The site is presently in the Green Belt but is capable of providing a suitable and sustainable location for housing, helping to meet the housing need in the short to medium term.
- 1.3 This Hearing Statement builds on earlier representations submitted on the Regulation 19 version of the Local Plan.

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)?

- 1.4 Whilst the Council has identified housing need based on the standard methodology in the National Planning Policy Framework, it has not been applied in accordance with the methodology in the PPG (as updated). This is because the Council has applied the figure in Policy S4 from 2020 on the assumption that this is the likely adoption date of the plan. This application is inconsistent with the requirements of paragraph 2a-008-20190220 of the PPG. Paragraph 2a-008-20190220 requires strategic policy-making authorities to calculate their local housing need figure at the start of the plan-making process. The 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. By applying the identified housing figure from 2020 the Council have not complied with the methodology in the PPG.

- 1.5 Because of this incorrect application of the methodology in the PPG, the Council is in effect ignoring the housing needs in the period between the point at which a plan is submitted to the point at which it is adopted. This approach taken by the Council is not sound and will result in an identified housing need for 2018/19 and 2019/20 and any unmet needs that may occur during the two-year period being ignored by the Council. As such, the start of the plan period should be brought forward to 2018, and the housing requirement adjusted accordingly, reflecting the housing need at the point at which the plan was published under Regulation 19 of the Town and Country Planning Regulations 2012.

2. Are any starting point LHN adjustments necessary?

- 1.6 Paragraph 60 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring authorities should also be taken into account in establishing the amount of housing to be planned for.
- 1.7 In our previous Regulation 19 Representations, we raised concern that the Council has not indicated whether there are any neighbouring authorities that cannot meet their own needs or how the Council has worked with neighbouring authorities to try and meet these needs.
- 1.8 The Council have stated in their response to question 8 of the Inspector's Initial Questions that no agreement to take unmet need from neighbouring authorities exists. We are concerned because the lack of agreement does not mean that unmet need from neighbouring authorities does not exist.
- 1.9 Paragraph 11 provides further guidance on this, confirming that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
- i. The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 1.10 The wording of the revised NPPF highlights the need for a strong reason for restricting the overall scale, type or distribution of development in the plan area. In the case of St Albans City and District Council we do not consider that the Green Belt is a strong enough reason for not meeting the needs of neighbouring areas. This applies across large parts of Hertfordshire, so most authorities are in a similar situation.
- 1.11 It is identified within the Council's Green Belt Review Purposes Assessment (2013) that given the non-strategic nature of the small-scale sub-areas identified for release that the list of parcels suitable for release may not be exhaustive. It goes on to confirm that it is therefore possible that additional potential small-scale boundary changes that would also not compromise the overall function of the Green Belt might be identified through a more detailed survey. This clearly indicates that the Council could do more to meet the unmet needs of other areas without harming the purposes of the Green Belt. As such, we consider that the Council should allocate more sites for residential development in the Local Plan.

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

- 1.12 Our concern with the stepped trajectory in policy S4 and appendix 2 of the plan was raised in our representations to the Regulation 19 consultation. The Council plans to deliver 565 homes per annum between 2020 and 2025 and 1,075 between 2025-2030 and 2030-2036. The approach to delivery in the first five years is almost 50% lower than the forecasted annual delivery from 2025-2036 and 40% below the annual target of 913. This demonstrates that the Council is placing a significant emphasis on delivery during the latter years of the plan period.
- 1.13 Whilst there is always a degree of uncertainty in the later years of the plan period, placing more pressure on delivery during this stage, combined with a housing target that will already be challenging to meet, could result in the Council failing to deliver its need and having an insufficient five-year housing land supply. It will also cause an unnecessary delay to delivery.
- 1.14 Paragraph (021 Reference ID: 68-021-20190722) confirms that strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. There is no justification in the Local Plan or supporting evidence base for the stepped trajectory. Furthermore, lower housing delivery in the early years of the Plan will be compounded by the under-delivery of housing in the years preceding the Plan. The level of the stepped trajectory for earlier years is also so not justified and will create an unnecessary delay

in meeting housing needs. To overcome this the Council should identify a housing trajectory that can meet needs in the short term, and to do this must allocate additional sites that could come forward earlier in the plan period.

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

- 1.15 We are concerned that the Council cannot realistically deliver the housing requirements over the 16-year plan period based on its assumptions. According to the housing trajectory, the strategic allocations will deliver 11,945 homes. However, the Local Plan can only deliver 10,085 homes by the end of the plan period with four sites not being able to deliver their total allocations by 2036. This leaves a shortfall of 1,860 from the strategic allocations alone, which would not be delivered until the following plan period.
- 1.16 Subtracting the delivery of 10,085 homes from the total requirement, leaves a shortfall of 4,523 dwellings. The housing trajectory expects that this remaining need will be delivered through existing permissions, existing windfalls, urban optimisation and Council owned sites, for example. This amount also includes a proportion of homes which are expected to be delivered based on pre-application discussions with applicants as well as submitted applications.
- 1.17 Having reviewed the housing trajectory, we do not believe that the Council can deliver its housing need. The total amount, not expected to be delivered through allocations, amounts to 31% and is based on a series of unjustified and unrealistic assumptions. Instead the Council should be seeking to provide as much certainty to delivery through additional site allocations, principally land that can be delivered in the early part of the plan that will not be delayed by major infrastructure requirements or other matters such as complex land assembly.

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WYG

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SITE PLAN

Whole available site area

(as submitted under our Regulation 19 representation)



Smaller potential sub-area for early development

