

ST ALBANS CITY AND DISTRICT LOCAL PLAN EXAMINATION

Matter 5: Objectively Assessed Need for Housing and Employment Land (Policy S4)

Hallam Land Management and St Albans School

Main Issue: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for housing and employment land.

Question 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. The approach in the Publication Draft Local Plan is to base the housing requirement/target on the Standard Method Calculation published in September 2017 of 913 dwellings per annum.
2. As a foundation, this accords with the approach set out in the NPPF/NPPG.
3. The NPPG states that 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 examination¹. On this basis it is a current figure. (If this were recalculated with the current median workplace-based affordability ratio it would not show a discernible difference: 893dpa rather than 913dpa. This is not considered materially different and certainly no basis to adjust the Local Plan).
4. However, there are two pertinent observations about the practical application.
5. Firstly, the figure is expressed as a target rather than a minimum; something to be aimed for rather than surpassed. This is in contrast with the first test of soundness which requires the Local Plan to be positively prepared.
6. Secondly, the time period over which the per annum requirement is used results in unmet need not being accounted for. The figure of 913 dpa is derived from the period 2016-2026 although Planning Practice Guidance suggests this can be used for whole plan periods. However, the figure of 913 dpa is only being used from 2020 onwards and no consideration is given to the period prior to 2020. By comparison, housing completions for this period are estimated to be less than half of this figure².
7. The NPPG advises that "*Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate*" (emphasis added). In this instance, the start of the plan-making process can reasonably be said to be 2018, although it should not be overlooked that the process of preparing a replacement plan to the 1994 Local Plan has been on-going for much longer and

¹ Paragraph 008 Reference ID: 2a-008-20190220

² Housing Delivery Test 2015/16 – 2017/18 and Housing Trajectory 2018/19 – 2019/20

evidence of the full objectively assessed need for housing being in excess of 700 dwellings existed for several years prior to this.

8. The magnitude of the housing requirement existed just as much in 2018 when the Publication Draft was being prepared as it will in 2020. Indeed, had the Council chosen the plan period to be 20 years from 2018 to 2036 then without question the housing requirement would be been in the order of 16,000 (913*18) but because a future date of 2020-2036 has been chosen the true scale of housing for the period 2018-2020 is not accounted for.
9. Taken together, this illustrates that:
 - firstly, the housing requirement should be defined as a minimum requirement;
 - secondly, surety is necessary as to the delivery of housing supply sources that are relied upon; and
 - thirdly, the Broad Locations, particularly those expected in the first 5-year period, should be delivered with alacrity.

Question 2. Are any starting point LHN adjustments necessary?

10. We do not have any comments on this question.

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

11. We do not have any comment on this question.

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

12. The stepped trajectory in Policy S4 comprises the following:

2020-2025	565 dpa
2025-2030	1075dpa
2030-2036	1075 dpa
13. To understand the magnitude of this step change it is necessary to look at previous completions, which between 2015/16 and 2019/20 are suggested to be in the region of 400 dpa³.
14. In effect therefore an increase of 40% is expected between the current 5-year period (2015-20) and the first 5-year period of the plan (2020-2025) and then a further 90% increase between that 5-year period and the next (2025-2030).

³ Housing Delivery Test 2015/16 – 2017/18 and Housing Trajectory 2018/19 – 2019/20

15. Within the first 5-year period of the plan, there is a discernible increase in output because in the first instance delivery at the North St Albans and North West Harpenden Broad Locations and, thereafter, other Broad Locations. This is discussed further in response to Matter 8.

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

16. The Plan's housing trajectory suggests 1835 dwellings will be delivered after the end of the plan period, which corresponds with Policies S6iii, S6iv and S6xi.

Question 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?

17. We do not have any comments on this question.

Question 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?

18. We do not have any comment on this question.

Owen Jones
LRM Planning
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