

**St Albans City and District Local Plan
Examination**

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

**Responses on behalf of
M Scott Properties Limited**

December 2019

Turley

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Client

M Scott Properties Ltd

Our reference

SCOC3009

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1. Introduction

- 1.1 This Statement has been prepared by Turley on behalf of M Scott Properties Ltd (herein referred to as Scott Properties), pursuant to Matter 5 (Objectively Assessed Needs for Housing and Employment Land (Policies S4 & S5)) of the St Albans Local Plan Examination.
- 1.2 Scott Properties are promoting land to the west of Watling Street, Park Street, for the delivery of residential development, including a minimum of 50% affordable housing to be delivered within the first 5 years of the Plan. Scott Properties has submitted written representations in connection with the promotion of this sustainable site to all previous consultation stages of the emerging Local Plan.
- 1.3 Scott Properties maintains its objection to a number of policies within the emerging St Albans City and District Local Plan, as set out in the submitted Regulation 19 representations. Namely; that the SACDC Local Plan is not positively prepared, is not justified, is not effective, or consistent with national policy. As such, the submitted Local Plan cannot be considered to be sound in its current form and requires major modification.
- 1.4 The primary areas of concern in relation to Matter 5 relate to the following issues:
 - The plan period, commencing from 2020 not 2018, is contrary to national guidance and will not seek to address any under delivery during this period. As a result, the Plan will not be effective in meeting its needs across the Plan period;
 - The use of a stepped trajectory is inappropriate, unjustified and not in accordance with national policy.
- 1.5 The remainder of this Statement responds directly to the questions raised by the Inspector. Scott Properties and its professional advisors have also requested to participate in the relevant Matter 5 Hearing Session to articulate the issues within this Statement.

2. Responses to the OAN 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 As set out in our response to Matter 8, we do not consider the application of the standard methodology to be consistent with the PPG, given the proposed Plan commencement date is 2020.

2.2 The PPG states at paragraph 004 Reference ID: 2a-004-20180913 that, in calculating the minimum annual local housing need figure, the 2014-based household projections should be used to:

"...calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period)."

2.3 The Plan is inconsistent in this respect, given the annual housing need figure was calculated in 2018 in accordance with the standard methodology, and yet is ignored until 2020. To rectify this, we consider that the correct commencement date for the Plan should be 2018, and that the Council should be seeking to meet as a minimum the annual housing need of 913 dpa from this date.

2.4 The decision to start the Plan period in 2020 results in a shortfall of 972 dwellings, based on the expected delivery as set out in the Housing Trajectory (Appendix 2 to the Plan). In addition, it is clear in paragraph 002 Reference ID: 2a-002-20190220 of PPG that the standard method uses a formula to identify the **minimum** number of homes expected to be planned for (our emphasis). Based on a calculated need of 16,434 homes between 2018-36, the supply as set out in the Housing Trajectory falls short by 708 dwellings minimum. As set out in our Matter 8 statement, we consider the Housing Trajectory to be unrealistic and unjustified, therefore the actual undersupply is likely to be considerably higher.

2.5 In its current form, the Plan is inconsistent with national policy and therefore unsound. To rectify this, the Plan start date should be amended to 2018, and the undersupply addressed through additional allocations of smaller, suitable sites within the District. This will also ensure a suitable buffer and provide flexibility should the Plan not deliver as expected, in accordance with paragraph 11 of the NPPF.

Q2) Are any starting point LHN adjustments necessary?

Q3) Is the housing target in the Plan appropriately aligned with forecasts for jobs growth?

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

- 2.6 When considering the use of a stepped trajectory, paragraph 3-034-20180913 of PPG states:

“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.”

- 2.7 We could not find any evidence nor justification for the use of a stepped trajectory within the Council’s evidence base. In light of the persistent historic under-delivery of housing, including affordable housing within the District, we consider the use of a stepped trajectory to be highly inappropriate. The extent of the under-delivery is highlighted in Table 1 overleaf, and demonstrates the critical existing need for housing.
- 2.8 As a result of the Council’s unjustified decision to discount small and intermediate sustainable sites early on in the site assessment process, there is an insufficient supply of specific, deliverable sites within the first five years of the Plan, contrary to paragraph 67 of the NPPF.
- 2.9 As set out within our other matters statements, the decision to discount sites of less than 14ha and/or ones which would provide less than 500 dwellings was based on an unjustified pre-determined view that such sites would fail to meet the exceptional circumstances test for release from the Green Belt, or provide significant new infrastructure. This is not a satisfactory justification for the use of a stepped trajectory, and we consider that it does unnecessarily delay meeting identified development needs, contrary to PPG as set out above.
- 2.10 **Appendix 1** shows the effect of the stepped trajectory on expected housing delivery. It is not until 2025/26 that there is expected to be a surplus in supply, although this makes little impact on the sizeable shortfall of 2,136 dwellings accrued by this point, as measured from 2018. This deficit is not addressed throughout the duration of the Plan period, resulting in an overall undersupply of a minimum of 708 dwellings.
- 2.11 The identification of smaller, sustainable sites would have significantly improved housing delivery over the short and medium term of the Plan period, and likely would have prevented the requirement for a stepped housing trajectory. In addition, it would also help to address the persistent shortfall of housing across the Plan period.

Appendix 1: Housing Trajectory

Housing Trajectory: St Albans District Council 1 April 2018 indicative draft

Description	5 Year Land Supply																				
	2017/18*	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total supply - 2020 onwards	Total supply - 2018 onwards
Current known/expected delivery (2020-2036)	385	426	428	544	541	553	324	219	162	169	155	155	155	155	155	155	155	155	155	3906	4,761
East Hemel Hempstead (North) (Policy S6 i)							75	140	180	180	180	180	180	180	140	100	65			1,600	1,600
North Hemel Hempstead (Policy S6 iv)															75	125	125	125	125	575	575
East Hemel Hempstead (South) (Policy S6 iii)							75	140	180	180	180	180	180	180	180	180	180	180	180	2,195	2,195
North West Harpenden (Policy S6 viii)						75	75	75	75	75	75	75	55							580	580
East St Albans (Policy S6 v)							75	100	100	100	100	100	100	100	100	25				900	900
North St Albans (Policy S6 vi)						75	120	120	120	120	120	120	120	85						1,000	1,000
North East Harpenden (Policy S6 vii)										75	75	75	75	75	85	75	75	75	75	760	760
West of London Colney (Policy S6 ix)									75	75	75	75	75	65						440	440
Chiswell Green (Policy S6 x)								75	75	75	75	65								365	365
Park Street Garden Village (Policy S6 xi)										80	150	180	180	180	180	180	180	180	180	1,670	1,670
LP/NPPF Delivering Urban Optimisation									80	80	80	80	80	80	80	80	80	80	80	880	880
Trajectory Total	385	426	428	544	541	703	744	869	1,047	1,209	1,265	1,285	1,200	1,100	995	920	860	795	795	14,871	15,726

*Actual Delivery figure taken from AMR 2018

2020 Plan Commencement (as proposed)

Annual Housing Need Figure				913	913	913	913	913	913	913	913	913	913	913	913	913	913	913	913		14,608
Annual Deficit / Surplus				-369	-372	-210	-169	-44	134	296	352	372	287	187	82	7	-53	-118	-118		264
Cumulative Deficit / Surplus				-369	-741	-951	-1,120	-1,164	-1,030	-734	-382	-10	277	464	546	553	500	382	264		264

2018 Plan Commencement (as per national policy)

Annual Housing Need Figure		913	913	913	913	913	913	913	913	913	913	913	913	913	913	913	913	913	913		16,434
Annual Deficit / Surplus		-487	-485	-369	-372	-210	-169	-44	134	296	352	372	287	187	82	7	-53	-118	-118		-708
Cumulative Deficit / Surplus		-487	-972	-1,341	-1,713	-1,923	-2,092	-2,136	-2,002	-1,706	-1,354	-982	-695	-508	-426	-419	-472	-590	-708		-708

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