

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

**MATTER 5**

**Tuesday 4<sup>th</sup> February 2020**

**Statement by Jed Griffiths MA DipTP FRTPI  
On Behalf of CPRE Hertfordshire**

**December 2019**

## Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the Campaign to Protect Rural England, Hertfordshire (CPREH). It has been compiled in response to the invitation by the Examination Inspectors to submit further material on the matters to be considered at the hearing sessions. This statement addresses the Issues and Questions under Matter 5 – Objectively Assessed Needs for Housing and Employment (Policies S4 & S5).
2. Earlier representations were made by CPREH to the Publication Draft of the Local Plan against policies S4 and S5. The purpose of this statement is to amplify the points made at that time, and to address the specific issues and questions set out by the Inspectors in the agenda (Document ED26). Not all the questions will be answered in full – the focus will be on those issues and questions which are relevant to the case made by CPREH.
3. In its earlier representations, CPREH considered that policies S4 and S5 were neither justifiable nor effective, and were inconsistent with national policy as set out in the National Planning Policy Framework (NPPF). In terms of the overall policies for housing and employment, the Local Plan is clearly unsound.

### **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 amended)?**

4. In the CPREH statements on Matters 3 and 4, CPREH has expressed its concerns that the housing numbers produced by the calculation of objectively-assessed needs is far too high. The objections made in May 2018 to the Publication Draft Local Plan were based on the use by the Council of the previous (2012) NPPF and Planning Practice Guidance (PPG), which required authorities to use the latest available data, including the 2016-based household projections which had just been published. As a result of the Local Plan being submitted after 24<sup>th</sup> January 2019, the new NPPF now applies, together with the standard method set out in the revised PPG.
5. In its earlier representations, CPREH considered that policy S4 was flawed. This view has not changed. The most recent view of the local authority seems to be contained in the Council's responses to the Inspectors' initial questions (Document ED23). The responses (Documents ED10 – ED12, dated 24<sup>th</sup> May 2019, seemingly relate to the changes made to the section on housing need, dated 20<sup>th</sup> February 2019.

6. The Inspectors' initial questions (Question 8) refer to the PPG (at Reference ID 2a-010-003-2190220) which considers when it may be appropriate to plan for a higher housing need figure than the standard method indicates. In its reply (paragraph 8.3), the Council states that none of the four circumstances described in the PPG apply for this Local Plan.
7. In an earlier paragraph (Reference ID 2a-003-3019220), however, PPG makes it clear that the standard method is not mandatory if circumstances warrant an alternative approach. CPREH considers that an alternative approach is appropriate in Green Belt areas such as St. Albans, where the exceptional circumstances referred to in PPG do not exist. It is also significant that the Council's response (paragraph 8.7) notes that the Strategic Housing Market Assessments (SHMA) for both the City and District of St. Albans and South West Herts show significantly lower levels of housing need than the standard method. In these circumstances, it is regrettable that the Council has chosen to stick with the substantially higher housing need figures, as outlined in the report to the Planning Policy Committee on 12<sup>th</sup> September 2017 (Document ED10A).
8. CPREH asks whether the housing target in policy S4, of 14,608 dwellings (at an average annual rate of 913 dwellings) is appropriate in a Green Belt authority. The latest application of the standard method, set out in Document ED11C, gives a capped housing need figure of 892 dwellings per annum. Together, Documents ED11A, ED11B, and ED11C indicate a reducing capped need calculation. In addition, the results of the 2016-based household projections show a much lower number of households than previously forecast by the Council. In those circumstances, CPREH questions how a figure as high as 14,608 dwellings could be arrived at in the Local Plan. What happened to reality and common sense? In the Local Plan, CPREH also notes the latter year targets of 1,075 dwellings per annum are considerably higher than any rate which has been planned or delivered in the past.
9. As CPREH has also pointed out, however, the calculation of housing needs (the starting point") and the affordability adjustment are only the first part of the setting of the Local Plan housing requirement/target. CPREH has made reference to paragraph 11 of the NPPF, which states that authorities should plan for objectively-assessed needs unless the application of policies in the NPPF that protect assets or areas of particular importance provides a strong reason for restricting the overall scale, type or distribution of land in the area. One of the assets referred to is the Green Belt. The Council has clearly not taken this step, but has decided to meet its objectively assessed needs in full, unacceptably in the view of CPREH because of the consequential harm to the Green Belt.

**Q2. Are any starting point LHN adjustments necessary?**

10. In its response to the Inspectors' initial questions (Document ED12), the Council argues that no starting point adjustments to LHN are necessary. Reference is made to the Planning Policy Committee report of 12<sup>th</sup> September 2017, which pre-dates both the changes to the NPPF that introduced the "standard method" and the latest household projections (September 2018). This point does need some clarification

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

11. In paragraph 9 above, CPREH has referred to the policy constraints set out in paragraph 11 of the NPPF, which apply to plan-making for housing and other uses. These other uses include employment land, and plan-makers must have regard to Green Belt as well as any other policy constraints. It is therefore imperative that there is a clear alignment between the housing target and forecasts of job growth, also land allocations for housing and employment uses.
12. The Local Plan seems to take an opportunistic approach to jobs growth and the allocation of employment land. In the response to the Inspectors' initial questions (question 11), no specific numbers are given. Much is made of the existence of the Hertfordshire Enterprise Zone, and the possibilities for economic growth at Hemel Hempstead East, the Building Research Establishment, and Rothamsted, all of which have areas of Green Belt. CPREH is concerned that, if the forecasts are correct, there will be also be a danger of over-heating in the economy. In turn this could lead to even higher demands for housing.

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

13. The stepped trajectory, set out in policy S4 and Appendix 2 of the Local Plan, is not appropriate in the context of the City and District. The link between policy S4 and the Appendix 2 is confusing. As pointed out in paragraphs 6 and 7 above, CPREH is seriously concerned about the higher delivery figures in the second and third five-year periods. These are much too high and would need to be reviewed in the course of time, to reduce impact on the Green Belt.

14. In earlier representations, CPREH has offered the view that the past number of windfall sites should be used as a minimum number in the Plan's future allowance. As referenced in the statement on Matter 3, the Council should be applying the recent NPPF emphasis on the use of previously-developed land and increased housing densities. Together these measures would help to minimise the harm to the Green Belt in the District. CPREH also supports the reference to "urban optimisation" in the trajectory at Appendix 2.

**Q5. How much housing is anticipated after the plan period as a result of the proposals in the Local Plan?**

15. The Plan does not state how much housing will be anticipated after the plan period. CPREH is extremely concerned about this issue, because of the large numbers of dwellings proposed in the document. This point must be addressed in successive Authority Monitoring Reports (AMR), which will inform the first review of the Local Plan within five years.

**Q6. Have the Council set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the future pattern and scale of development and any relevant allocations, as set out in paragraph 65 of the NPPF?**

**Q7. 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.?**

16. It would appear that Question 6 has been covered, as all the designated neighbourhood areas are towns or villages listed in policy S1. CPREH has no comment on Question 7.

**Questions 8 – 18: Gypsies and Travellers**

17. CPREH has no comments to make on this section of the Local Plan.

**Q19. How has the Functional Economic Market Area (FEMA) been defined and is it appropriate?**

18. The FEMA is described in the South West Economic Study report produced by Hatch Regeneris for the South West Authorities. The final version of the study was issued in September 2019, but the Local Plan seems to have taken account of earlier drafts. The study area embraces the City and District of St. Albans, Dacorum Borough, Hertsmere Borough, Watford Borough, and Three Rivers District. Clearly, there are functional links between the five local authority areas, as described in the report and it would seem to be appropriate. The strong links between the City and District and Welwyn Hatfield Borough are mentioned but not covered in the report.

**Q20. What is the overall need for employment land that has been identified? What is the evidence for this? What is the situation regarding existing commitments and the residual need for additional land allocations? What is the past trend in take up rates for employment land?**

19. As stated above in the answer to Question 3, CPREH is extremely concerned that there is no evidence on the overall need for employment land. It is evident from policy S5 and supporting documents that the Council has based the key elements of its economic policy on the Hertfordshire Local Economic Partnership (LEP) Strategy. This created the Hertfordshire Enviro-Tech Enterprise Zone. It is clear from policy S5 that the sites listed in it are linked to the concept of the Enterprise Zone. The policy is driven by the LEP, and there is no convincing evidence that the Council has produced its own jobs forecasts linked to forecasts of population and housing needs.
20. In its original representations, CPREH has not objected to the specification of the two existing research establishments as Special Employment locations, despite their location on the Green Belt. It is considered, however, that some limitations be put on the nature and extent of future development that would be permitted (see CPREH previous representations on Policy L11).
21. The danger is that all of the sites shown in the Local Plan, should they be developed, would generate over-heating in the local economy, leading to an excess of housing demands. There would be an increase in in-commuting to the District, with consequent pressures on transport and infrastructure. All of the sites are in or adjacent to the Green Belt, which would be under threat from expansion.

**Q21. Overall, does the evidence base provide adequate justification for the jobs target set out in policy S5?**

**Q22. Does the jobs target align with the Hertfordshire Enviro-Tech Enterprise zone?**

- 22. The only jobs target specified in policy S5 is for the significant employment development within the East Hemel Hempstead Broad Location (55 hectares, up to circa 10,000 jobs). In its previous representations, CPREH has objected to the allocation of this site because of the potential harm it would cause to the Green Belt.
- 23. There are no figures for the other sites specified in the plan. The evidence base is deficient in supporting the policy. What is needed is a table within the text, listing the locations for jobs, coupled to a specific figure for the jobs target in each of these areas.

**Q23. Are the employment land requirements consistent with the housing requirement figure?**

- 24. As CPREH has intimated above, this is not clear. The employment land allocations are ambitious and the danger is that over-heating of the local economy and the housing markets could occur.

**Q24. Does the Plan allocate sufficient land to meet the identified minimum need in policy S5?**

- 25. The problem is that no figure for employment need has been shown in policy S5. CPREH suspect that too much land has been allocated.

**Q25. Does the land allocated provide sufficient choice and flexibility?**

- 26. CPREH has no comments to make on this question.

**Q26. What are the inter-relationships with other authorities in terms of employment land provision and how have these been taken into account?**

27. Except in the allocation in the Broad Location at East Hemel Hempstead (Central), there is no evidence in the policy. From the background reports, it is clear that the City and District has been actively involved in the South West Hertfordshire Partnership. This should be made more explicit. There is no reference to the interrelationship with Welwyn Hatfield Borough to the east. In terms of the local jobs market, there are high levels of cross-border commuting. In recent years, there has been a growing relationship between St. Albans and the University of Hertfordshire, which is based in Hatfield. As stated in paragraph 19 above, CPREH is concerned about the role of the Hertfordshire LEP, which is not a statutory planning authority. As such, it has no remit to consider the social or environmental repercussions of its proposals, hence their overall sustainability. Arguably, the LEP has exerted too much influence in the determination of the Local Plan policies on employment.

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10<sup>th</sup> December 2019