

**MATTER 5: OBJECTIVELY ASSESSED
NEEDS FOR HOUSING AND EMPLOYMENT
(POLICIES S4 & S5)**

**HEARING POSITION STATEMENT SUBMITTED ON
BEHALF OF BURHILL DEVELOPMENTS LTD**

**St Albans City & District Council – Local Plan Examination in
Public**

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1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared in response to the Inspector's published 'Matters, Issues and Questions' (MIQs) on behalf of Burhill Developments Limited (BDL) who own both Aldwickbury Park Golf Club and Redbourn Golf Club. On behalf of BDL, we have promoted both sites for residential development to each stage of the emerging Local Plan and most recently, the Regulation 19 (Publication Draft) (September 2018) where comment was made on the soundness of the spatial strategy within the Plan and matters of its legal compliance. This submission must be read in the context of, and in conjunction with those duly made representations.
- 1.2 Whilst we confirm BDL considers both sites are available, suitable, viable and deliverable for residential development now, Aldwickbury Park Golf Club (the 'Site') is considered to be particularly well placed to provide a high quality residential development forming a sustainable extension to Harpenden (a Category 1 settlement) in accordance with the Spatial Strategy and Settlement Hierarchy as outlined in Policy S1.
- 1.3 This Statement raises concerns with the assessment process the Council has taken in developing its Spatial Strategy, namely:
- The starting point for the Plan period in the context of its housing need assessment; and
 - The unjustified extent of use of a stepped trajectory in meeting housing need over the Plan period.

2 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)?

- 2.1 The Council's approach to housing need is unsound in the context of the proposed Plan Period ('2020-2036') as proposed in Policy S4.
- 2.2 The figure of 913 dwellings per annum (dpa) has been derived from the indicative standard methodology assessment, published by Ministry of Housing, Communities and Local Government ('MHCLG') on 14th September 2019, assisting the consultation document *"Planning for the right homes in the right places"*. It uses affordability ratios for 2016, and average household growth over the period 2016 to 2026 from the 2014 based household projections.
- 2.3 The PPG Housing Need Assessment states¹ that in setting the baseline the most recent national household growth projections, for the local authority are used, *"this should be 10 consecutive years, with the current year being the first year"*. Consequently, the starting point of the projections should correspond with the start date of the Plan period.
- 2.4 The PPG goes on to state *"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."*² With the housing need figure based on a 2016 base-date, it cannot be considered a sound starting point.

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

- 2.5 National guidance³ makes allowance for a stepped trajectory 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. It is acknowledged that the Council will experience a large jump in housing requirement and proposes a number of strategic sites to meet this need. However, this needs to be balanced against the

¹ PPG Reference ID: 2a-004-20190220

² PPG Reference ID: 2a-008-20190220

³ PPG Reference ID: 68-021-20190722

current acute affordability crisis within the District, and hence the reliance on strategic sites is not sound because it does nothing to address the existing crisis when there are options available to the Council to address this.

- 2.6 The PPG goes on to state *“Where there is evidence to support a prioritisation of sites, local authorities may wish to identify priority sites which can be delivered earlier in the plan period, such as those on brownfield land and where there is supporting infrastructure in place e.g. transport hubs. These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement”*.
- 2.7 It stands to reason that where there are available, the Council should identify these as site allocations in order to boost delivery within the first five years of the Plan period. BDL’s sites have been overlooked throughout the production of the Local Plan and both are deliverable early in the Plan period.
- 2.8 Furthermore, the standard methodology already applies a cap to ensure that local housing need remains at a deliverable level for a local authority. The PPG states:

The standard method may identify a minimum local housing need figure that is significantly higher than the number of homes currently being planned for. The cap is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible.

The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible.

Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered. This may help prevent authorities from having to undertake an early review of the relevant policies.

Reference ID: 2a-007-20190220

- 2.9 Uncapped, the Local Housing Need figure for St Albans increases to approximately 985 dpa.
- 2.10 St Albans has experienced an average of just 0.71% stock growth per annum since 2001, whilst experiencing a current affordability ratio of 16.59. This is poor performance. It is evidenced in the table below which compares the Council’s performance to other local authorities who have experienced significantly higher stock growths, despite having a significantly lower median house price to earnings ratio.

Local Authority	Stock Growth	Affordability Ratio
Vale of White Horse	2.5%	9.5
Dartford	2.3%	8.9
Uttlesford	2%	11.8
Stratford-on-Avon	2%	10
Cherwell	2%	9.8
N.W Leicestershire	2%	7
Cambridge	2%	13
Daventry	1.9%	9.6

- 2.11 This evidence demonstrates that we consider the Council should have the market capacity to deliver a significantly higher housing figure than is currently proposed in the Plan.
- 2.12 Applying a stock based approach of 2% to St Albans would result in an annual requirement of 1,208 dwellings. Whilst we are not advocating a stock based approach to calculating housing need, it demonstrates that the reason supply has been suppressed so significantly is purely due to the failure of the Council to produce a new Local Plan, and there is no reason the market could not deliver a higher level, early in the Plan period.
- 2.13 A similar stepped trajectory has recently been tested during the Examination to the Guildford Borough Council Local Plan. St Albans is similar to Guildford as it has experienced significant and sustained under-delivery of housing over a number of years in an administrative area that is heavily constrained by Green Belt. However, the situation is arguably far worse in St Albans, which has a median workplace-based affordability ratio of 16.59 versus 12.53 in Guildford. This renders St Albans as one of the least affordable places to live in the UK and creates significant and damaging social division in the community.
- 2.14 At the Examination to the Guildford Local Plan, the Inspector recognised that the proposed stepped trajectory would not deliver sufficient homes early enough to counter worsening affordability trends and their damaging social and economic effects. Furthermore, if the stepped trajectory is applied, it would entirely negate the purpose of a 20% buffer which seeks to address under-delivery, and would be contrary to national policy to significantly and demonstrably boost the supply of housing.

- 2.15 Whilst it is appreciated the Plan seeks to rely on delivery from a number of large, strategic sites, these are entirely reliant on strategic infrastructure that is outside of the Council's control. Furthermore, the decision of the Council to rely on these sites is not one that is required in the presence of available alternatives. BDL's sites are available, developable and deliverable within the early years of the Plan and the development of these sites represent sustainable extensions of Category 1 / 2 settlements consistent with the guidance in Policy S1 and adhere with the principles of sustainable development.
- 2.16 The proposed use of a stepped trajectory means the Local Plan cannot be considered positively prepared, or possible of being found sound at Examination.