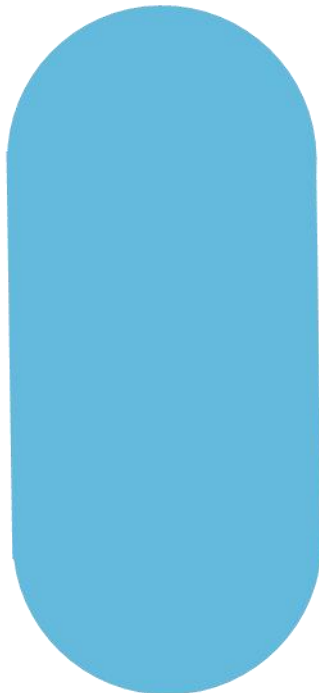


**WRITTEN STATEMENT IN RESPECT OF THE ST ALBANS CITY
AND DISTRICT LOCAL PLAN EXAMINATION**

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

On behalf of Martin Grant Homes and Kearns Land Ltd



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our clients, Martin Grant Homes and Kearns Land Ltd, in respect of its interests in land to the east of Redbourn, as part of the forthcoming examination (EIP) of the St Albans City and District Local Plan.

MATTER 5 – OBJECTIVELY ASSESSED NEEDS FOR HOUSING AND EMPLOYMENT LAND (POLICIES S4 & S5)

- 1.2 The representations made below respond to specific questions raised in the Inspector's Matters, Issues and Questions paper for the Examination in so far as they are relevant to our clients.

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.

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)?

- 1.3 The Council has undertaken a series of calculations in response to the Inspectors' Matters, Issues and Questions and these are presented at the Council's response to Q8 (ED11) and its appendices ED11-A-C).
- 1.4 The PPG sets out the steps to be taken to calculate the housing need using the standard method (Paragraph: 004 Reference ID: 2a-004-20190220) and helpfully directs plan-makers to "calculate the projected average annual household growth over a 10 year period (this should be
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10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period)” (Emphasis added).

- 1.5 The PPG goes on to say (008 Reference ID: 2a-008-20190220) 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..... However, 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.”
- 1.6 The PPG also says (012 Reference ID: 2a-012-20190220) that “The method provides authorities with an annual number, based on a 10 year base line, which can be applied to the whole plan period.”
- 1.7 This presents an issue in that the ‘starting point’ for this plan was the assessment in September 2017 that presented a housing need figure of 913 homes a year. Application of this (with the monitoring year of 2017/18 being the then ‘current year’) should result in 2017 being recognised as the start of the plan period.
- 1.8 What the Council has attempted to do, is forestall the standard method figure from applying before the plan is adopted by delaying its application until 2020 with a plan period of 2020-2036. This has the effect of meaning that the (then) current year of 2017 is no longer used as the starting point and as a result the standard method has not been applied at the start of the plan-making process for the whole plan period.
- 1.9 The Council’s application of the Standard Methodology to the plan-making process is not therefore in accordance with the methodology in the PPG.
- 1.10 In our view, the plan should be based upon the standard methodology calculation of 913 homes for the period 2017/18 to 2035/2036 resulting in
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a total housing requirement of 16,434 homes. As drafted Policy S6 identifies 14,608 homes as the 'housing requirement/target' [sic] which is 1,826 short of the need calculated through appropriate application of the PPG methodology.

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

- 1.11 Policy S5 says that "Provision is made for, and is required to be retained to enable, sufficient land and floorspace to cater for both full employment and to provide for a wide range of employment land uses."
- 1.12 It is not apparent from the evidence base that any assessment of the amount of employment land needed to achieve 'full' employment has been undertaken. The Council's recently provided reasoned justification for policy S5 (S5.1 – S5.6) makes no reference to the number of jobs needed. How the Council has considered and planned for the relationship between the amount and location of employment and housing land is not clear.
- 1.13 In any event, the Council's response to the Inspectors' Matters, Issues and Questions: Q11 (ED13) says "For the avoidance of doubt, the employment land need identified (and provision) at East Hemel is in order to cater both for St Albans direct needs and a role for provision for wider South West Herts employment land needs." It is not clear from the evidence base how these strategic, cross boundary issues have been managed or the evidence that underpins the decisions relating to the amount of employment land and how it relates to the housing provision.
- 1.14 In responding to Q8 of the Inspectors' Initial Questions to the Council in respect of an uplift to the housing figure (ED2) the Council state (paragraph 8.3 of ED10) that "*none of the four circumstances described in the PPG (for "when it might be appropriate to plan for a higher housing*

need figure than the standard method indicates”) or any other circumstances, apply in the situation of this District for this Local Plan” (emphasis added).

- 1.15 Although the PPG offers four examples of circumstances where it may be appropriate to plan for a higher housing figure it specifically notes:

“Circumstances where this may be appropriate include, but are not limited to...” (emphasis added).

- 1.16 Whilst the Council say that no other circumstances apply we consider that there should also be an understanding of the relationship between the economic strategy and the need for homes, particularly given the Council's statements that they wish to provide for full employment. Even if this is not required to understand whether there should be an uplift, it is required to make sure that a cogent strategy is being prepared for the District in the context of the wider HMA/FEMA.

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

- 1.17 We have no objection to a stepped trajectory in principle. However, the relationship between the stepped trajectory, the need for homes and the deliverability of housing land cannot be understood from the evidence base.

- 1.18 The Framework says that “to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay” (paragraph 59). The stepped trajectory does not encourage the delivery of homes without delay.

- 1.19 Furthermore, the application of a 'forward looking' plan-period (2020 to 2036) means that no undersupply for early years of the plan is being considered (and therefore no additional homes to remedy that under-provision). For example, a further 3 years of undersupply against market demand (2017-2020) will affect the affordability ratio that would need to be employed in a standard method calculation at the point of adoption. In other words, the under provision is being suppressed within the calculation. This also has consequences for the housing provision calculations and assessment, including the identification of an appropriate buffer (the Framework: paragraph 73) which is explored in the Martin Grant Homes and Kearns Land Matter 8 statement).

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?

- 1.20 No. The Martin Grant and Kearns Land Matter 3 Statement sets out our concerns that the development strategy has not considered local housing needs and that the Local Plan process has not had regard for the aspirations of the Redbourn Neighbourhood Plan which recommended the release of sites through the Regulation 14 Publication Version. As a consequence, the Local Plan does not accord with the Framework: paragraph 65.

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

- 1.21 See paragraphs 1.10 – 1.16 in response to Q3 above.

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

1.22 See paragraph 1.13 above.