

Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.

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

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. 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)?

- 1.1. Yes, the Council's application of the 'standard methodology' as set out in the National Planning Policy Framework is considered to be in accordance with the methodology in the PPG (as updated). The Plan housing requirement/target was calculated directly in line with the standard method set out in the PPG on Housing and economic needs assessment, Paragraph: 004 Reference ID: 2a-004-20190220. When the Plan was being prepared for Publication at the Regulation 19 stage, the draft NPPF 2018 based 'standard method' figure at the time was 913 dwellings per annum. This was based on the formula and ['Housing Need Consultation Data Table'](#) set out under the Department of Communities and Local Government ['Planning for the Right Homes in the Right Places'](#) consultation proposals as pertained at the time. The consultation for Regulation 19 commenced on 4 September 2018, therefore the approach was to use the 913 dwellings per annum as the District's overall housing need figure in the Plan.
- 1.2. On 26 October 2018, the Government published a document entitled ['Technical consultation on updates to national planning policy and guidance'](#). This primarily set out the Government's proposed approach to changing the 'Standard Method' for calculating housing 'need' relating to Local Plan work. The figure for St Albans City and District produced by the proposed methodology at the time was 902 dwellings per annum. Subsequently, with the passage of time, the current 'standard method' figure for comparison is now 896 dwellings per annum (based on the Housing OAN at 28 March 2019). A comparison table was shown in response to Question 9 ([ED11](#)) of the Inspectors Initial Questions and is included at M5Q1 Appendix 1.

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2. Question 2

Are any starting point LHN adjustments necessary?

- 2.1 Yes, in accordance with the NPPF and relevant parts of the PPG, a starting point LHN adjustment is considered necessary “to take account of affordability”. Also, in accordance with the NPPF and PPG, a ‘cap’ has been applied to the LHN figure as set out in the PPG at ‘Paragraph: 004 Reference ID: 2a-004-20190220’.
- 2.2 The relevant calculations are as set out the Councils Response to Inspectors Initial Questions Friday 24th May 2019 at ED0011, ED0011A, ED0011B and ED0011C.

3. Question 3

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

- 3.1 Yes, the Council considers that the housing target in the Plan is appropriately aligned with forecasts for jobs growth. This is in so far as it is possible to achieve appropriate alignment through a Plan and land use planning actions that accord with the NPPF. The housing target/requirement is generally consistent with and matched by substantial jobs growth capacity and opportunity. In the St Albans context, given the connectivity to London, realistically, the alignment of housing targets and jobs forecasts can only be addressed in a Plan at a very general level. The ability of the Plan to have a directly influence is limited; essentially to deciding the level and location of housing and employment land allocations and promoting infrastructure improvements.
- 3.2 It is considered crucial to emphasise that the Plan is led by housing provision. The housing requirement is taken directly from the need figure arrived at through the NPPF 'standard method'. Some Local Plans are deliberately led by employment forecasts; the intention being that economic development and an associated employment land and / or job growth target is the driving force. Housing provision levels are then judged on a secondary basis to ensure that there is sufficient labour supply potential to meet fill the jobs available in the area. This approach can work well for main employment centres, which usually have a net in-commute position. The context for St Albans is very different and that approach is considered certainly not to be appropriate for this Plan.
- 3.3 Further related detail is set out in response to other Matter 5 responses, particularly responses to M5 Q21 and Q23.

4. Question 4

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

- 4.1 Yes, the Council considers that the stepped trajectory in policy S4 and appendix 2 of the Plan is indeed appropriate and justified. The Council has also responded in detail in relation to the 'stepped trajectory' point in the related Matter 8 Questions 7 and 8. By using the stepped approach there is an appropriate balance between delivering as quickly as reasonably possible the very large uplift in homes required in the NPPF by the Government's new 'standard method' (circa 250% of long term average delivery in the District of circa 360 pa) and ensuring that there is sufficient lead in time to deliver the required infrastructure; all while being realistic about how quickly large scale developments can reasonably be progressed through Masterplanning and planning application processes and then built out. The Plan sets out a significant change in approach from previous tight Green Belt restraint, since 1994. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall Plan development strategy.
- 4.2 SADC has considered the issue and rationale for using 'stepped' targets and the implications on the supply and delivery of housing on a number of occasions, including most explicitly as set out in the Green Belt Topic Paper ([ED25C](#)) at pages 55-56:

PPC June 2018 Report - Draft Local Plan for Publication (Regulation 19 Stage) Consultation - Recommendation to June Cabinet

...

- 4.6 *Following the approach indicated in the Regulation 18 consultation, the draft LP sets out an approach that is seeking to deliver an average of 913 homes per annum. This meets the Government's proposed 'standard methodology' figure for housing need in full across the LP period 2020-2036. In order to allow realistic time for delivery of the homes and infrastructure, the LP takes a 'stepped' approach to housing targets. This has become common in recent years in adopted Plans and is directly addressed in the Government's current Planning Practice Guidance draft update.*

- 4.3 Pages 69-70:

Representation Point

Plan fails to consider sites that can come forward quickly to help maintain a 5 years supply of deliverable housing sites. Requirement of specific deliverable sites for years 1-5 is not met.

...

Outline Reply

Disagree

Recommended Reply (including notes and references)

The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.

- 4.4 The issue of a stepped housing requirement for plan-making is set out at Paragraph 021 of the PPG:

When is a stepped housing requirement appropriate for plan-making?

A stepped housing requirement may be appropriate 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. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.

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.

Paragraph: 021 Reference ID: 68-021-20190722

Revision date: 22 July 2019

- 4.5 The appropriate approach to a stepped housing requirement for calculating 5 year land supply is set out at Paragraph 026 of the PPG:

How is 5 year housing land supply measured where authorities have stepped rather than annual average requirements?

Five year land supply is measured across the plan period against the specific stepped requirements for the particular 5 year period.

Paragraph: 026 Reference ID: 68-026-20190722

Revision date: 22 July 2019

- 4.6 The Council considers that its approach in S4 and the Appendix 2 Trajectory accords fully with the approach set out in the PPG and is appropriate and justified.

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5. Question 5

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

- 5.1. The Council anticipates 1,835 dwellings to be completed after the Plan period of 2020-2036. This is set out in the Plan at Appendix 2 – Housing Trajectory. With the passage of time and therefore updated information and incorporating a small number of minor factual error corrections, an updated draft of Local Plan Appendix 2 with a base date of 1 April 2019 is included in M5Q5 Appendix 1. The Council anticipates 1,760 dwellings to be completed after the Plan period of 2020-2036. There is an explanation of the updated approach underpinning the Housing Trajectory 1 April 2019 base date at M5Q5 Appendix 2.

6. 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?

- 6.1. No, the Council has not explicitly set out a housing requirement for designated neighbourhood areas. However, the Council has in the Local Plan set out clearly the overall strategy for the pattern and scale of housing development and that this will be wholly provided for by the Plan. There is no overall need for additional housing requirements from Neighbourhood Plans / Neighbourhood Areas. However the Local Plan does provide a role for Neighbourhood Plans to deliver more housing where the local evidence supports it. This is effectively additional housing 'on top' of the requirement for housing which is directly provided overall through the Local Plan itself. This is set out at S2 (Development Strategy) (including the proposed minor modification as at [CD 024](#)), and also L4 (Affordable Housing) and L5 (Small Scale Development in Green Belt Settlements).
- 6.2. The NPPF at paragraphs 65 and 66 set out:
65. *Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations³⁰. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.*
66. *Where it is not possible to provide a requirement figure for a neighbourhood area³¹, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.*
- 6.3. It is important to note that paragraphs 65 and 66 did not exist at the time the Local Plan was endorsed by the Council resolution of [11 July 2018](#).
- 6.4. The new paragraph 65, along with all other changes as part of the updated 2018 NPPF, was reviewed at Planning Policy Committee in meeting [September 2018](#), and there were considered to be no changes necessary to the Plan.
- 6.5. Of the neighbourhood plans currently being progressed, Redbourn and St Stephens are understood to be allocating sites for housing, as well as the already made plan for Harpenden. It is also understood that Wheathampstead and Sandridge are not currently looking to progress the allocation of housing.

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7. 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?

- 7.1. Yes, the Council has 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. The Plan evidence on the housing (accommodation) needs of gypsies and travellers is set out primarily in its Gypsy and Traveller Accommodation Assessment (GTAA) ([HOU 021](#)). This meets the Housing Act 1985 requirements (see paragraph 2.3 of [HOU 021](#)).
- 7.2. The GTAA is a comprehensive study of the special accommodation needs of people who have a cultural preference to reside in caravans. The assessment provides evidence that is appropriate in terms of three inter-related legal and national policy requirements:
- [Ministry of Housing Local Government and Communities \(MHCLG\) Planning policy for traveller sites 2015 \(PPTS\)](#). (paragraph 4a *local planning authorities should make their own assessment of need for the purposes of planning*)
 - [The Housing Act 1985 \(Section 8\) as amended by the 2016 Housing and Planning Act \(HA\)](#). For this District this effectively requires an assessment of the special accommodation needs of any part of the local population that has a cultural preference to live in a caravan (the District has no waterways, so houseboats are not relevant)
 - [The Equalities Act 2010 \(EA\)](#). This creates legal protection against discrimination for certain groups of people (those with protected characteristics) as well as the public sector 'equalities duty', whereby public authorities are legal bound to exercise their functions with 'due regard' to the requirements of the Act (Section 149). The protected groups relevant to the assessment of needs and provision of culturally appropriate accommodation are Roma, Romany Gypsies, Scottish Gypsies and Travellers and Irish Travellers. The direct, full, household survey method (with at home personal contact) used for the GTAA is designed to get a good level of information about the ethnicity and identity groups of people living or wishing to live in caravans.
- 7.3. The GTAA, the Plan and these MIQ responses use the term 'gypsy and traveller' generally to include all the groups of people potentially wishing to live in caravans (as set out above). However, for the purposes of Plan-making it is also necessary to refer specifically to the sub-group who meet the PPTS definition (still travelling).

Gypsies and Travellers

8. Question 8

Does Policy L7 accord with the guidance in Planning Policy for Traveller Sites (PPTS) and is it justified and effective?

- 8.1. Yes, the Council considers that Policy L7 (when considered alongside Policy S6 in particular and the Plan as a whole) accords with the guidance in Planning Policy for Traveller Sites (PPTS) and is justified and effective. The PPTS (at paragraphs 9/10) sets out that the Local Planning Authority should set “locally set” pitch targets for new gypsy and traveller accommodation based on a PPTS compliant definition of accommodation needs. Provision made through policies L7 and S6 in the Local Plan equates to the stepped requirement approach for general housing provision. The very ambitious boost in general housing supply (circa 250% of long term average of 360 dwellings pa) proposed will, necessarily, take some time to deliver. A stepped approach (as addressed elsewhere in responses to the MIQs) is therefore considered appropriate, justified and effective. The same stepped approach applies to gypsy and traveller provision.
- 8.2. The policy accords appropriately with the PPTS, when appropriate account is taken of:
- The distinction between assessed ‘need’ and the Plan requirement (target) and;
 - the need to read the Local Plan as a whole (including Policy L7 linked to Policy S6);
 - the associated need to comply with the NPPF generally (PPTS paragraph 1), especially Green Belt (GB) policy;
 - the overall planning circumstances of the District; in particular Local Plan proposals to very substantially ‘*boost the supply of land for housing*’ (NPPF paragraph 59), despite extensive GB constraints (the District is entirely washed over by the Metropolitan Green Belt).
 - the practicalities of providing new gypsy and traveller accommodation. This can be either public or private provision. Public provision is commonly seen as effectively a form of subsidised affordable housing, where land has to be secured by the public sector and a willing service provider / manager found. Private provision is commonly seen as initiated by the gypsy and traveller community itself and therefore offers more flexibility in delivery. However, it is primarily land opportunity and market driven. In both cases, outcomes are heavily influenced by land availability and land values, including development hope value in rural (in this District entirely Green Belt) locations or value expectations in areas released from the Green Belt.
- 8.3. The Tables below summarise the Local Plan locally set targets (PPTS paragraphs 9/10) (proposed provision) against GTAA assessed ‘need’:

Table Q8i

Plan Period and Trajectory	2020/21 - 24/25 Yrs 0-5	2025/26 - 29/30 Yrs 6-10	2030/31 - 34/35 Yrs 11-15	2035/36 Yrs 16 on	Total (annual average need /requirement / 16)
1. Assessed need (PPTS definition)	44	10	11	7	72
<u>LP provision (BLs)</u>	<u>30 (2 x 15 pitch sites)</u>	<u>30 (2 x 15 pitch sites)</u>	<u>Depends on Plan review</u>	<u>Depends on Plan review</u>	<u>60 (6 pa in first 10 years, 3.75 pa overall)</u>

Table Q8ii

Plan Period and Trajectory	2020/21 - 24/25 Yrs 0-5	2025/26 - 29/30 Yrs 6-10	2030/31 - 34/35 Yrs 11-15	2035/36 Yrs 16 on	Total (annual average need /requirement / 16)
1. Assessed need (PPTS definition)	44	10	11	7	72
2. Potential additional need (PPTS definition undetermined)	1	1	2	1	5
<u>3. Total of 1+2. (maximum PPTS definition need)</u>	<u>45</u>	<u>11</u>	<u>13</u>	<u>8</u>	<u>77 (4.5 pa)</u>
'Potential' additional need (PPTS definition not met)	21	7	8	5	41
Maximum Need (PPTS definition not applied)	66	18	21	13	118
<u>LP provision (BLs)</u>	<u>30 (2 x 15 pitch sites)</u>	<u>30 (2 x 15 pitch sites)</u>	<u>Depends on Plan review</u>	<u>Depends on Plan review</u>	<u>60 (6 pa in first 10 years, 3.75 pa overall)</u>
Notes	<p>GTAA need 5 year periods 2018 -33 differ from Plan period.</p> <p>Need profile from GTAA is applied approximately to Plan period / BL start date trajectory. The figure for the first 5 years is taken as immediate need.</p> <p>A realistic delivery trajectory means that Plan allocation cannot deliver new pitches until towards the end of the first 5 year period (2024/25).</p>				

- 8.4. The PPTS definition compliant need is assessed at 72 pitches ([GTAA Para.1.16](#)). This is a substantial level of need, reflecting the household growth projections arising from the high concentration of existing sites in the District. The PPTS (paragraph 9) says that it is only this clearly identified PPTS definition need that should be addressed through Plan-making “Set pitch targets.... as defined in Annex 1” (meets PPTS definition only).
- 8.5. The Council’s “locally set target” (PPTS paragraphs 9/10) is acknowledged as not being explicit in the Plan or Policy L7. Instead, it is embodied in the policy requirements for land within the Local Plan Broad Locations (BLs) (Local Plan Policies S6ii, iii and xi). The Council’s locally set target/requirement is to provide 2 x 15 pitches (total 30) in the first 5 years and 4 x 15 pitches (total 60) as part of the development of the BLs over the first 10 years of the Plan. This 60 target/requirement, subject to the review of the Plan within 5 years set out at paragraph 2.7, is the same in total over whole Plan period to 2036.
- 8.6. The practical approach to provision and delivery involves grant of planning permissions (initially likely to be whole Broad Location outline permissions) with planning obligations securing the gypsy and traveller site provision. Then, the specific sites will be planned and designed in detail, with delivery, funding and management arrangements put in place (see more on delivery issues in responses to related Matter 5 Questions below). The Masterplanning for the East Hemel (Central and South) Broad Locations has on an ongoing iterative basis identified specific locations for the required two 15 pitch allocations.
- 8.7. Site provision therefore depends on the release of the BLs from GB and making the land available under planning obligations. The practicalities mean that any Plan target must be led by realistic prospects and timescales for site provision in the BLs. The PPTS requirement for a “*locally set*” (*target*) is considered to directly provide for this way of setting a target; based on the BL opportunities / development timescales and expressed in the BL policies at S6.
- 8.8. The way the Local Plan specifically addresses PPTS Policy B Plan-making (at PPTS paragraph 10) is considered in more detail below:
- a) *identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets*
- 8.9. The locally set target for the first five years of the plan period is 30 pitches (Table Q8i). This comes from the Local Plan requirements for site provision at the East Hemel Hempstead Central and South BLs (Policies S6 ii and iii), which are NPPF *deliverable* towards the end of that period, in accordance with the general needs housing trajectory.
- 8.10. The planned boost to accommodation and GB release context means there can only realistically be a gradual increase in supply. As a result the Plan requirement / target is stepped (NPPF Para.65 / PPG ID: 68-021-20190722) through a realistic trajectory, in the same way as for general housing.
- 8.11. Table Q8i above compares the target and assessed need figures, allocated to five-year periods. This need split to periods is approximate, as the periods used in the GTAA differ slightly from the proposed Plan period. Immediate PPTS compliant need (within the first 5 years of the Plan period - likely 2020 - 2026 - see Local Plan Housing Trajectory) is acknowledged as being 44 pitches.

- 8.12. Provision in this period will only be realistically possible at the East Hemel Hempstead BLs (30 pitches). The Local Plan cannot fully meet this immediate need through the BL developments, due to the inevitable step up / lead in period for major development following Green Belt release. The position with regard to gypsy and traveller provision is exactly equivalent to that faced by the 'settled community' and general needs housing. For all groups, assessments of housing need suggests substantial growing and currently unmet, need, but it is not reasonably feasible to respond immediately in an authority entirely washed over by the Metropolitan Green Belt.
- 8.13. Proposals for immediate provision in GB locations would be considered against the NPPF (paragraph 143) and PPTS on a GB 'Very Special Circumstances' (VSCs) basis. This applies equally to all groups in the community. It is for this reason that Local Plan policy L7 includes a development management, criteria based element. The Council will consider private proposal applications for more immediate provision against the criteria set out. This part of Policy L7 provides an important immediate and ongoing response available to the challenge of immediate gypsy and traveller accommodation needs. That this is an important, 'justified' and 'effective' part of the Plan approach is demonstrated in recent decision-taking examples. Permissions have been granted at Ardens Rise, House Lane, St Albans for 3 additional pitches (February 2017) and at Nuckies Farm, Colney Heath for 3 additional pitches (on appeal APP/B1930/W/18/3212960 November 2019) (See [AMR 001](#) paragraph 2.56 and [AMR 002](#) figure 47 for locations).
- 8.14. It can be noted that, on an ongoing basis, the Local Plan Policy L7 criteria-based approach also allows for needs that, on a GTAA survey basis, did not meet the PPTS definition. On a case by case basis, based on the evidence, individual sets of circumstances would be considered.
- 8.15. The trajectory for provision of sites in the BLs (illustrated in Table Q8i and Table Q8ii) is that 2x15 pitch sites are made available later in the Plan period in years 6-10, under policy S6 xi at Park Street Garden Village (NPPF *developable*). In comparing need against the "locally set target", the Tables show that by year 10 the trajectory for development is expected to provide 60 new pitches against a known PPTS definition compliant need of 54. This a potential modest oversupply of six pitches. In the unlikely event that the 5 GTAA 'undetermined' were all eventually to be shown to meet the PPTS definition there would by year 10 be provision of 60 new pitches against a theoretical total need of 58. This would be a potential modest oversupply of two pitches. By the end of the Plan period in 2036, there would be a modest deficiency of 12 pitches against the theoretical total need of 72 pitches. In the unlikely event that the 5 GTAA 'undetermined' were all eventually to be shown to meet the PPTS definition, by the end of the Plan period in 2036, there would be a modest deficiency of 17 pitches against the theoretical total need of 77 pitches. Very importantly, well before the end of the Plan period, the commitment in the Plan at paragraph 2.7 (and the statutory five yearly Plan review requirement) will allow the need and provision position to be updated. This includes taking account of any delivery through permission granted under policy L7 criteria, (including intensification or extension of existing sites).

9. Question 9

[i] The GTAA update 2019 identifies a need for 72 additional pitches for households that meet the definition in the PPTS. [ii] It also identifies a need for up to 5 additional pitches from undetermined households, and a need for 41 additional pitches for households that do not meet the planning definition. How are these to be provided for?

- 9.1. [i] This is set out in detail in the response to M5 Q8. This bulk of the need is to be met by the Local Plan proposal for land reservations with the BLs. The Table shows that by year 10 the trajectory for development is expected to provide 60 new pitches against a PPTS definition compliant need of 56. This a potential modest oversupply of four pitches. By the end of the Plan period in 2036, there would be a modest deficiency of 12 pitches against need. The rest of PPTS compliant need can be met by L7 criteria compliant re-configurations and extensions of existing sites in GB. Very importantly, well before the end of the Plan period, the commitment in the Plan at paragraph 2.7 (and the statutory five yearly Plan review requirement) will allow the need and provision position to be updated. This includes taking account of any delivery through permission granted under policy L7 criteria, (including intensification or extension of existing sites).
- 9.2. The Local Plan sets out to meet confirmed PPTS compliant need in full and the combination of policies L7 and S6 can achieve this. This approach is generally equivalent to that for general housing needs.
- 9.3. [ii] This is set out in detail in the response to M5 Q8. This need is:
- a *potential* need only (the 5 undetermined) ([HOU 021](#) paragraphs 6.56-8). This is a low level of need in relation to the 'definition met' figures, which are already assessed as higher than is typical nationally due to the household characteristics and age profile, as determined by the household survey ([HOU 021](#) paragraphs 6.27-9) (nationally 25%, therefore only 1 extra pitch might be expected to be needed – [HOU 021](#) paragraph 6.57)
 - a housing need that is clearly shown (by detailed household survey) to not meet the PPTS planning definition (the 41). This is possible need only, depending on a cultural reference for caravan accommodation. The PPTS does not require Plan targets and provision of specialist accommodation for this possible need (PPTS paragraph 9)
- 9.4. The GTAA method used takes a potential / possible maximum 'need' approach([HOU 021](#) paragraphs 3.11-12), through:
- its comprehensive household interview, rather than sample, survey
 - its assumption that all household growth from the gypsy and traveller defined community could be manifest as an aspiration or demand (as opposed to need) for caravan accommodation
 - based on the point above, its quantification of household growth not meeting the planning definition

- 9.5. The assessment of general housing need (NPPF Standard Method) is based on official demographic projections, which cover all newly forming households, including those with an ethnic or cultural preference for caravan accommodation. This means that housing provision meeting that assessment includes capacity for the gypsy and traveller community. Much of the assessed need which does not meet the PPTS definition will fall to be met in general housing ('bricks and mortar' in GTAA colloquial terms).
- 9.6. It is likely that some newly forming households in these groups will have a preference to live in bricks and mortar accommodation. This is a lifestyle choice that can occur as a result of increasing community integration. As with the settled community, this could be through purchase or rent of private bricks and mortar accommodation; which may be of a type that reflects aspects of cultural preference (rural / with workspace / grazing etc.), or possibly by priority access to social / affordable housing.
- 9.7. As well as the overall provision meeting the full 'Standard Method' figure which includes those with an ethnic or cultural preference for caravan accommodation, the Policy L7 criteria offer sufficient opportunity to meet any need arising from these groups, that justifies additional provision on privately provided sites, through the development management process, including under GB 'VSCs'. If a need for culturally appropriate accommodation arises from gypsy and traveller households within an EA protected group, this mechanism is also appropriate.
- 9.8. It is considered important to note that this approach was recommended by the specialist consultant conducting the GTAA ([HOU 021](#) paragraph 1.11):

.....the Council should consider the use of a criteria based policy (as suggested in PPTS) to deal with any planning applications from undetermined households or from new households seeking to move to the area and develop a site (windfall applications), as opposed to making any specific allocations. A criteria-based policy can also be used to deal with any applications from households currently living in bricks and mortar.

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10. Question 10

**What site allocations are to be made for those who meet the definition (72 pitches)?
Policy L7 refers to four 15 pitch sites in 3 of the Broad Locations only (total of 60).
What about the shortfall of 12 pitches?**

10.1. This question is addressed in detail in the responses to M5 Q7-9 above.

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11. Question 11

How are the needs of those 'undetermined households' that may meet the definition to be provided for?

11.1. This question is addressed in detail in the responses to M5 Q7-9 above.

12. Question 12

How are the needs of those not meeting the definition to be provided for? Paragraph 1.12 of the GTAA suggests that the need for those households who did not meet the definition (41 pitches) will be addressed as part of general housing needs and through separate local plan policies (as required by paragraph 60 of the Framework). Where is this evident?

12.1. This question is addressed in detail in the responses to M5 Q7-9 above.

13. Question 13

Bearing in mind the Council's stepped approach, is the plan consistent with the requirement of national policy to identify a supply of specific deliverable sites sufficient to provide at least five years' worth of supply against the local requirement and identify broad locations for growth for years 6 -10?

- 13.1. This is mainly answered in responses to M5 Qs 7-10 above. Yes, the Council considers that the Plan is indeed consistent with the requirement of national policy to identify a supply of specific deliverable sites sufficient to provide at least five years' worth of supply against the local requirement and identify broad locations for growth for years 6-10.
- 13.2. As set out in the question, the Plan is to be judged against a 'local requirement', not 'need' identified in a GTAA. The Council's "locally set" target is embodied in the policy requirements for land within the Local Plan Broad Locations (BLs) (Local Plan Policies.S6ii, iii and xi). The Council's locally set target/requirement is to provide 2 x 15 pitches (total 30) in the first 5 years and 4 x 15 pitches (total 60) as part of the development of the BLs over the first 10 years of the Plan.

14. Question 14

How were the 3 Broad Locations identified as being suitable for gypsy and traveller sites chosen? Why are they preferred to the other Broad Locations?

14.1. This is set out directly in limited detail at L7 as:

Because of a variety of factors including: proximity to the road network most used by Gypsies and Travellers; development site scale; area topography and landscaping opportunities; and the wide range of uses to be provided in the Broad Locations for development (Policy S6); provision of the following new sites will be required:

14.2. The inclusion of gypsy and traveller sites in the East Hemel Hempstead (policies S6 ii and iii) and Park Street Garden Village (Policy S6 xi) BLs is explained briefly in the Policy wording (L7). More detail is below:

- Scale of the BL and opportunity to accommodate the sites alongside other forms of development
Gypsy and traveller sites are relatively land hungry forms of development; (a 15 pitch site is likely to require circa almost a hectare, giving a net density of only 20 dwellings / households per hectare). Sites can incorporate business uses and this could extend their size. Careful site planning in relation to adjoining uses is a prerequisite (PPTS paragraphs 10d and e). These larger BLs therefore offer the best opportunities to accommodate the sites with low impact on other land uses and without detriment to wider planning objectives and amenities.
These considerations are also instrumental to ensuring that overall residential development at the BLs is achieved. Inclusion of a gypsy and traveller site in one of the smaller BLs could potentially affect deliverability of general housing due to perceived neighbour issues and resultant property market, viability, and land ownership /value issues. Overall, gypsy and traveller pitches are more readily assimilated in large scale development, as in these BLs.
- Suitable strategic locations for the sites
Typically, gypsies and travellers wish to locate close to good strategic road links, because they can travel quite long distances for work on a regular basis. These BLs have the best direct access to the most important aspects of the strategic road network; namely the M1 (north / south) and the M25 and A414 (east / west).
- Accessibility of the sites to social and community facilities
This is particularly important for health and education. The PPTS (Para 13) acknowledges deprivation and potential EA issues in this respect. The largest BLs will have the widest range of new local primary and secondary education and local health facilities. There is a better chance of planning and providing effectively for the Gypsy and traveller community, and integrating those needs from the outset, with a large new community.
- Other site specific attributes
The attributes of these BLs, partly as a result of scale, but also due to their character, topography and adjoining uses, necessitates inclusion of significant open and landscaped areas in the evolving Masterplans for their development. Sometimes this

land buffers different land uses and boundary features. This creates the opportunity to include well-designed sites in semi rural settings that the gypsy and traveller community commonly prefer.

14.3. These considerations all directly reflect the principles set out at Para 13 of the PPTS.

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15. Question 15

Do the proposed sites reflect the needs of travellers?

- 15.1. This is mainly answered in the response to M5 Q14.
- 15.2. Meeting the needs of travellers will also depend on appropriate location and design within the BLs in accordance with PPTS (particularly paragraph 13) and the chosen site delivery and management arrangements.
- 15.3. As the BLs are being carefully Masterplanned, sites will be designed from the outset to allow for a high standard of accommodation, with an appropriate setting and landscaping. It is intended that the gypsy and traveller community will be involved in due course in the collaborative Masterplanning process required under Policy S6 (point 1 in each case). This includes being involved in opportunities to help create workable delivery and management arrangements.
- 15.4. It can be noted that the emerging Masterplans for East Hemel (Central) and East Hemel (South) include areas specifically to provide the two 15 pitch Gypsy and traveller sites required.

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16. Question 16

The East of Hemel Hempstead (Central) Broad Location is a proposed employment site. As such is GT provision here appropriate? What is the nature of the work that is underway to support the delivery of 30 pitches here?

- 16.1. Yes. It is acknowledged that there is the primary business use designation of the BL and the council considers that appropriate gypsy and traveller pitch provision can also be achieved.
- 16.2. The general responses to M5 Qs 14/15 provide a general context for this response.
- 16.3. It can be noted that the proposal is for one 15 pitch site, not for 30 pitches (Local Plan Policy S6ii), with the land allocation stated as a planning requirement (Policy S6ii - 12).
- 16.4. The employment land designation of the BL as a whole (Local Plan Policies S6ii and L9e) results in part from its relationship to the strategic road network and existing adjoining employment land uses. Business is the main use and policies reflect the need to protect the land for that purpose long term. However, this does not rule out the other land uses as specified in the policy. The gypsy and traveller site would be an element of mixed use. Some gypsy and traveller sites incorporate business activity and this site provides this particular opportunity. This mixture with a proposed large Employment area is considered to be a particularly positive aspect of the proposal. This directly reflects the PPTS (paragraph18):
- Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses...*
- 16.5. The BL is also very large (55 Ha) and includes substantial boundary areas where open areas and landscaping will be required. There is every opportunity to accommodate a gypsy and traveller site without detriment to living conditions.
- 16.6. As set out in answer to previous Matter 5 Questions, early collaborative Masterplanning (Policy S6 ii - 1) between the Council and the landowner is well underway. This specifically demonstrates that an appropriate 15 pitch site can be provided within the BL.

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17. Question 17

How will the sites in the Broad Locations be achieved? (the policy suggests that locations will be identified, allocated and safeguarded through collaborative master planning under Policy S6). Is this approach costed and deliverable?

- 17.1. Yes. Viability and the achievability of delivery is demonstrated in both whole Plan and in relation to the individual Broad Locations. Viability and in the ongoing Masterplanning work where they are being identified, allocated and safeguarded. Viability at the whole Plan level is set out in the St Albans CIL and Emerging Local Plan Viability Study ([INFR 009](#)) and individual site viability is set out in [INFR Sep 2019 -St Albans CIL and Emerging Local Plan Viability - Study Strategic Site Testing](#). The planning requirement to make the site provision is clearly set out in Policy S6.
- 17.2. There has been explicit commitment from all BL land owners / developers to the content of Local Plan Policy S6, including Gypsy and Traveller provision: [Reconvened from the meeting held on 12 June 2018, Planning Policy Committee Monday, 18th June, 2018 7.00 pm](#)
- 17.3. This has also been set out in the East Hemel Broad Location landowner / developer SoCGs set out in response to other MIQs.
- 17.4. Planning obligations attached to planning permissions will in due course secure the delivery.

18. Question 18

Are any other allocations intended? What consideration has been given to the expansion or intensification of existing sites referred to in the GTAA? Has the suitability of extending existing sites or those with temporary permissions been considered (criteria 3 and 4 of Policy L7)?

- 18.1. No other allocations are intended. As set out in answer to earlier Matter 5 Questions, the planned provision levels / land allocations are substantial and sufficient to meet the assessed need, according to the PPTS definition, for the first 10 years of the Plan. There has been a high level consideration of the expansion or intensification of existing sites during the development of the Plan, particularly in mid 2018. It is considered that substantial potential exists for additional provision through expansion or intensification, where individually justified, through the Policy L7 criteria based approach to planning applications. It was partly on the basis of these high level considerations that the draft Policy L7 was worded in the way that it currently exists. This approach was supported at PPC, Cabinet and Council.

Employment Land

19. Question 19

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

- 19.1. The FEMA is defined according to the evidential basis set out in the PPG and is considered by the Council (and significantly also by adjoining and nearby Councils) to be very appropriate. The PPG suggests various quantitative and qualitative measures of economic geography that can be used to define a FEMA (PPG Paragraph: 019 Reference ID: 61-019-20190315). These have been followed and accorded with and therefore the FEMA is considered appropriate.
- 19.2. In [EMP 001](#), the South West Herts Economic Study Update 2019, the justification for the FEMA is discussed in detail primarily in chapter 3, pages 2-13, paragraphs 3.1-3.49. The Executive summary relatively concisely sets out the position on page (i) as:

Functional Economic Market Area

- iii. *The 2016 study identified a functional economic market area made up of **Dacorum, Hertsmere, St Albans, Three Rivers and Watford**. This was based on evidence of strong commuting and migration relationships and shared leisure, retail and public sector catchment areas.*

There has been limited data published since the 2016 study which would allow us to update the assessment, however the data which is available continues to suggest the definition of the FEMA is valid. This includes:

- *Recent migration data continues to point to strong relationships between the five authorities. The only strong relationship outside the FEMA is between St Albans and Welwyn Hatfield which was also the case in the 2016 study.*
 - *The refreshed Strategic Economic Plan continues to identify an M1 growth corridor which includes each of the local authority areas.*
 - *The 2018 South West Herts Retail and Leisure Study shows a significant proportion of each district's convenience and comparison shopping expenditure is within the FEMA, with a large amount of comparison spending occurring in Watford.*
- iv. *The FEMA also shares strong relationships with other areas which could exert a growing influence on economic and labour market trends in South West Herts. How these relationships might change in future is highly uncertain, however we would note the following:*
- *London: Given the high level of housing growth planned for South West Herts and continuing affordability challenges in London, it seems likely that the strong immigration and out-commuting flows between the FEMA and the capital will*

continue to grow. The loss of employment floor space in London also presents opportunities for South West Herts to attract jobs and businesses. Although this would be dependent on South West Herts authorities first addressing their own undersupply.

- Luton/Central Beds: significant employment and housing growth is planned around Luton, including ambitious plans to grow the capacity of the airport. However we do not anticipate this undermining growth in South West Herts. The economies of the two areas are sufficiently different for this growth to complement rather than compete with growth in the FEMA.*
- Cambridge-Milton Keynes-Oxford Corridor: this high performing area has been identified for significant growth up to 2050. This would involve significant investment in new infrastructure and housing and would look to capitalise on the area's knowledge assets. While any effects on South West Herts would be long term there may be a risk that the scale of development and new infrastructure investment could make this a more attractive investment location for certain sectors where there may be competition with South West Herts*

- 19.3. It is acknowledged that it is often difficult to find an appropriate level of self-containment, to define a meaningful FEMA. This is especially so for an area within the orbit of a large metropolitan area (in this case London – a world city with wide and deep economic geography influences).
- 19.4. Aside from the area's relationship with London, the District sits in a polycentric geography of urban areas. There are many medium sized towns in close proximity. They have different, often complimentary, employment, service / facility and 'dormitory' residential roles. This makes for complex jobs / homes relationships and resultant commuting patterns. Containment is affected by trends to make longer commutes, or to work in a mobile / remote way. There is increasing flexibility for individual choice of work and home location. These changes are likely to accelerate in the plan period, facilitated by information and communications technology developments and transport infrastructure improvements.
- 19.5. Initial research for the former draft SLP in 2015-16 favoured viewing the District as part of a widespread FEMA, defined as the official 'Luton' Travel to Work Area (TTWA). This is detailed in [EMP 003](#) (Section 3.6 page 87 onwards).
- 19.6. Subsequently, as a result of DtC engagement, the Council entered into formal joint working arrangements with the SWHG. As a basis for this joint work, it was agreed that the SWH local government administrative area would be taken as a single Housing Market Area (HMA) and FEMA. The evidence supporting the FEMA specific part of this decision is at in [EMP 002](#), updated and confirmed in [EMP Sept 2019](#). This more localised FEMA definition is reasonably well supported by the quantitative and qualitative evidence. It also has an acknowledged, more pragmatic, justification reflecting the need for a HMA / FEMA that would allow for effective analysis and governance.
- 19.7. The FEMA definition based on any administrative sub-area of Hertfordshire only has some acknowledged limitations in terms of the complex and heavily London-influenced economic geography. Nevertheless it has considerable advantages in terms of coordinated planning and economic development work through the Hertfordshire Local Enterprise Partnership (HLEP) and the closely related transport planning arrangements / initiatives of the Highway Authority (Hertfordshire County Council - HCC) ([INFR 001/004](#)).

- 19.8. This evolution of position accords fully with the PPG, which specifically allows for a range of methods in defining a FEMA. The final SWH definition places a practical emphasis on 'administrative area', linked to the HMA data analysis:

Administrative boundaries are identified by the Government as one of the indicators for the FEMA. We use these as the starting point for the FEMA. Using pre-defined district boundaries is a practical approach to identifying a FEMA and undertaking data analysis; the data required for the Economy Study (such as population and employment projections) is often not available at a sub-district level (Para 2.6 [EMP 002](#))

- 19.9. This HMA / FEMA definition and the related formal joint working arrangement consolidates the long term planning for major housing and employment developments at East Hemel Hempstead that had been emerging in the former draft SLP. There are now very strong, NPPF 'positive', DtC outcomes, embodied in the agreement that these plans should proceed. In respect of employment land the expansion proposal includes a major new employment area which forms the main part of an Enterprise Zone (Herts Enviro-Tech EZ) for the sub-region as a whole ([EMP 003](#) Section 6.2/3). These are central points in responding to the M5 Employment MIQs overall.

- 19.10. Though the defined FEMAs is quite localised, economic development work and links to the Local Plan have proceeded in the context of a wider understanding of functional economic geography. [EMP 002](#) (Section 2) / [EMP 003](#) (Section 3.6) show this is particularly the case in respect of relationships with:

- London
- Luton and Bedfordshire and the M1 corridor
- Welwyn Hatfield District (WHD) and the A1M corridor
- an east-west Hertfordshire economic 'axis' and transport infrastructure improvements (centred on the role of the A414) (a potential HELP led perspective in emerging local Industrial Strategy (IS) - noted in [EMP Sept 2019](#) Para. 4.24 and INFR documents - including 001/ 004)

- 19.11. Examples of this understanding are:

- the development of complimentary, rather than competitive, roles for the Herts Enviro-Tech EZ and the Luton (Airport related) EZ
- Recognition of the crucial role of Hertfordshire University links to SWH for economic development (through the Herts 'Green Triangle' initiative with the Herts EZ research and development locations in the District – Rothamsted Research (agriculture) and Building Research Establishment - BRE) ([EMP 003](#) Sections 2.3 and 6.3)

- 19.12. There is some cross-over with the response to Matter 2 Question 9 regarding the inter-relationships with other authorities.

20. Question 20

[i] What is the overall need for employment land that has been identified? What is the evidence for this? [ii] 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?

20.1. [i] The evidence suggests that the theoretical need for new employment generating land (B use classes) in the District is quite small (approximate range 2-15 Ha). However, Local Plan provision is based, strategically, on FEMA wide needs (range between 50 – 140 Ha). The substantial level of provision against need in the District is SWH wide and opportunity based. It is primarily justified on location and qualitative factors, rather than on a narrow District level quantitative 'need' analysis. The range in these need figures is quite wide and has varied considerably in different studies over relatively recent times. Explicitly, from the outset, the Local Plan approach has been based on sub-region wide economic development considerations, originally derived from the HLEP Strategic Economic Plan (SEP) ([EMP 011](#)). The SEP is now complemented by the emerging local IS - noted in [EMP Sept 2019](#) Para. 4.24). Local Plan policies and proposals are led by the opportunity to expand Hemel Hempstead, deliver the Herts Enviro Tech EZ and assist with regeneration of the former New town ([EMP 003](#)).

20.2. Quantitative need has been assessed both on a District basis ([EMP 003](#)) and on a SWH basis ([EMP 002](#) / [EMP Sept 2019](#)). The estimates of need are derived from analysis based on several different methods (to accord with the PPG - Paragraph: 027 Reference ID: 2a-027-20190220):

Strategic policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as:

- sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand)*
- demographically derived assessments of current and future local labour supply (labour supply techniques)*
- analysis based on the past take-up of employment land and property and/or future property market requirements*
- consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.*

20.3. The analysis consistently uses the local authority commissioned and published East of England Forecasting Model - EEFM labour demand forecasts (in some cases adjusted on the basis of local issues) ([EMP 003](#) Section 3.4/5 and [EMP Sept 2019](#) Para 7.6 onwards).

20.4. Quantitative need estimates for the District and the whole SWH area, taken from the most recent evidence ([EMP 002](#) / [EMP Sept 2019](#)) are summarised in the Table below (Rows 1 – 6; with sources referenced):

TABLE Q20i

Employment Land Needs Assessment / Provision Levels Comparison (Hectares)

Period 2018-36

Method of assessment	Need estimate office. B1a	Need estimate Ind. shed B1c/B2	Need estimate Wareh. shed B8	Totals	Notes
	SACD (SW Herts)	SACD (SW Herts)	SACD (SW Herts)	SACD (SW Herts)	
1. Employment led (labour demand) 2017 EEFM EMP 2019 Table 7.7	1.9 (9.2)	0.9 (4.7)	-0.2 (2.2)	2.6 (16.1)	SADC and SWH initial evidence preferred method
2. Labour Supply EMP 2019 Table 7.14	3.8 (19.5)	3.6 (2.4)	5.3 (37.0)	12.7 (58.9)	
3. Higher Growth (variant of employment led) EMP 2019 Table 7.18	4.9 (17.7)	4.1 (11.5)	8.8 (30.8)	17.8 (60)	
4. Trends based Property market net change in occupied space) – EMP 2019 Table 7.19	3.6 (19.3)	-0.5 (38.6)	-1.0 (82.1)	2.1 (140)	SWH current preferred method
5. SWH 2016 Study comparator (Employment led) EMP002 Table 6.4	10.7 (52.4)	-3.6 (-30.6)	7.8 (29.7)	14.9 (51.5)	Period differs 2013-36
6. LP proposed provision (East Hemel Hempstead - HETEZ) EMP003	11 20%	16.5 30%	27.5 50%	55 100%	See EMP003 Appendix 3, Scenario 2 Generalised split of uses Industrial and warehousing buildings

					(sheds) are potentially interchangeable between these uses.
7. Theoretical surplus / deficiency EMP 2019	+7.4 (-8.3)	+16 (-22.1)	+26.5 (-54.6)	+52.9 (-85)	= 6.- 4. (6.-4.)
8. Theoretical surplus / deficiency EMP002	+0.3 (-41.4)	+20.1 (+47.1)	+19.7 (-2.2)	+40.1 (+3.5)	= 6.- 5. (6.-5.).

Note: The [EMP Sept 2019](#) figures in the Table above are for land area 'need' in Ha. The recommended distribution of provision to Districts is on a particular basis and presents floorspace, rather than land area figures. These distribution figures were prepared for future joint planning ([EMP Sept 2019](#) Section 9 Para 9.2 on)

- 20.5. The table includes a comparison between need estimates from the different sources and provision made in the Local Plan (Rows 6-8). All the optional methods of assessment set out in the PPG (Paragraph: 027 Reference ID: 2a-027-20190220 - see above) are covered.
- 20.6. The need estimates finally recommended in [EMP 002](#) and [EMP Sept 2019](#) use different estimation techniques taken from the PPG 'suite' of methods. This is explained in [EMP Sept 2019](#) (Section 10) with, for offices; a significant reduction from the 2016 study (Para 10.16) and for industrial / warehousing sheds; a considerable change (Para 10.18). The effect is to reduce the need assessment for job intensive employment land uses (offices) and increase it for 'land hungry uses' (warehousing sheds in particular, where market demand is currently high).
- 20.7. The differences arise entirely because the more conventional labour demand method has been replaced with a (recent) property market trends method. This is an important evidential change that will be examined further in joint planning, as it has major implications for provision, site selection and Green Belt release across SWH.
- 20.8. Overall, for SWH land needs, there is a quite dramatic increase in land needed; up from 51.5 to 140 Ha (+88.5 Ha; an increase of 172 %, or almost 3 times more than the 2016 estimate of need). However, for the District alone, need reduces from 14.9 to 2.1 Ha, meaning the Local Plan allocates enough land (55 Ha at East Hemel (Central) with additional potential at Rothamsted and the BRE) to provide a surplus of 52.9 Ha for SWH wide needs. This reflects the District stock bias towards offices, the trend to loss of stock and very limited new provision in recent years.
- 20.9. On all methods of assessment, it can be seen that District quantitative estimates are so low in relation to provision, that they alone cannot determine, or justify, the level of employment generating land provision in the Local Plan. Instead, from the outset, the Local Plan approach has been based on sub-region wide economic development considerations, originally derived from the HLEP Strategic Economic Plan (SEP) ([EMP 011](#)). The SEP is now complemented by the emerging local IS - noted in [EMP Sept 2019](#) Para. 4.24). Local Plan policies and proposals are led by the opportunity to expand Hemel Hempstead, deliver the Herts Enviro Tech EZ and assist with regeneration of the former New town ([EMP 003](#)).

- 20.10. As set out in more detail in responses to Matter 2 Questions regarding the DtC, the explicit support for the provision at East Hemel by all of the SWH authorities is a very important DtC outcome. The exact position regarding how East Hemel (Central) will make a positive contribution (quantitatively) to assist SWH joint planning and emerging Local Plans is still in the process of being worked through. All are clearly in agreement that, taking account of the new evidence, the position in this Plan is, unequivocally, that it makes a major positive strategic contribution to SWH needs.
- 20.11. The mix of employment development proposed in the Local Plan for the Herts Enviro-Tech EZ is also relevant in the context of the latest evidence study, as it includes business-park office provision on a well located and attractive site, together with a substantial area for primarily logistics shed development (Local Plan Policy S6ii 5). The approach in the Local Plan also accords with the NPPF by making special provision for distribution uses (NPPF Para. 82).
- 20.12. Overall, the evidence is clearly that:
- There are very limited opportunities to provide employment land in the District and across SWH, other than through new greenfield Green Belt (GB) land allocations. This is because of residential land value and Permitted Development Rights (PDR) pressures for redevelopment. These apply despite the continuing importance of the St Albans City centre as an office location and the use of Article 4 directions on selected employment areas ([EMP 003](#) Section 4.8 and [EMP Sept 2019](#) recommendation).
 - The scale of provision in the Local Plan provides ample opportunity, choice and flexibility in the District employment land and property market.
- 20.13. [ii] Existing commitments (permissions and land) in the District (setting aside the Strategic Railfreight Interchange - SRFI) are very limited. Trends for take up of land and premises have picked up recently and vacancy rates are generally low.
- 20.14. The most recent summary position is set out in [EMP Sept 2019](#) (Section 9 - Demand and Supply Balance) which records the April 2018 position on existing commitments and residual 'need' for land allocations (this is done in terms of floorspace figures rather than the land estimates used to answer M5 Q2i above). The residual need is, in these tables, the total supply 'balance'. This position is put in the context of the answer to M5 Q 20i above, but bearing in mind that assessed need is not the same as a Plan requirement.
- 20.15. Evidence in [EMP Sept 2019](#) Table 9.1 shows the FEMA wide position for offices. Table 9.2 shows the FEMA wide position for industrial and warehousing (sheds).
- 20.16. The figures for SACD alone are reproduced below for ease of reference:

Extract Table 9.1 Market balance – office uses sq m

<u>Demand</u>	
<i>Net change (the need to be met based on the evidence study suggested district distribution)</i>	39,500
<u>Supply</u>	
<i>Commitments</i>	-15,364
<i>Allocated sites</i>	2,750
<i>Safeguarded/ proposed sites</i>	136,000
<i>Total supply</i>	123,386
<u>Balance</u>	83,886

Extract Table 9.2 Market balance – industrial / warehousing (shed) uses sq m

<u>Demand</u>	
Net change	75,900
<u>Supply</u>	
Commitments	-1,853
Allocated sites	5,850
Safeguarded/ proposed sites	152,000
Total supply	155,997
<u>Balance</u>	80,097

20.17. The important points to note about the 'balance' figures are:

- The significant PDR office to residential conversion losses still committed in the District are taken into account and thus expected to be made up in the balance; albeit it is clear that not all of these losses will actually occur as shortages increase office rents and discourage conversions ([EMP Sept 2019](#) Section 6).
- For research and policy analysis purposes the position recorded assumes that the long-standing proposals for east Hemel Hempstead (Herts EZ) are 'commitments' and therefore 'counted in' (though not yet in an adopted Local Plan). This is explained by the long (SLP) history of this proposal noted above.
- The SRFI permission is excluded from commitments. [EMP Sept 2019](#) comments at page 113(in the context of the new, much higher needs assessment) that:

If this development was included the industrial space with permission would increase dramatically by 331,665 sq m (mostly very large warehousing). There is still significant uncertainty about whether this development will go ahead. it is likely that this would be sufficient to meet all of the strategic demand for industrial space in the FEMA, although there will still be a need to provide small and medium sized units in other locations to meet local demand.

20.18. Detailed information on the qualitative attributes of the remaining main employment areas in the District is included in [EMP 003](#) (Section 4). These areas provide the baseline for future provision. The evidence studies record the important point (and policy implication) that the research on needs and provision assumes that the baseline of existing provision will not change: We would therefore encourage all South West Herts authorities to resist pressure for further changes of use in key employment areas, and explore the potential for imposing Article 4 directions in the most at-risk locations ([EMP Sept 2019](#) Para.10.11).

20.19. Local Plan policies (L9/ L10) set out to achieve this through the selective designation of Primarily Business Use Areas and Strategic Office Locations and their protection through Article 4 Directions removing permitted development rights for conversions to residential. This policy approach is firmly based on qualitative evidence identifying 'strategic employment areas' (at [EMP 003](#) Table 27 page 225 and Section 7.2 related to the former draft Detailed Local Plan - DLP). The relevant Article 4 Directions have already been put in place. The Article 4 Directions were confirmed on 26 Sept 2017. Details are at:

<https://www.stalbans.gov.uk/planning/Planningpolicy/employmentareas.aspx>.

20.20. Some less strategically important existing employment sites and areas are not covered by Local Plan policies L9/10 (in line with NPPF paragraph 121) and so some relatively small scale losses are anticipated to continue, affecting the overall balance of provision. These

losses to residential are addressed in more detail in response to Matter 8 Questions. However the scale of the new Local Plan allocation is still more than sufficient to compensate for this.

- 20.21. The longer term and recent rates of take up of employment land / premises are examined in detail on a SWH basis in evidence in [EMP Sept. 2019](#) (Section 6). For SWH take up for offices in the period 2013 - 2018 was 15,600 sq m net pa and for sheds in the period 2009-18; 17,000 sq m net per annum. Shed take up has been mainly warehousing.
- 20.22. Another way of looking at this is to consider levels of vacancy. Until recently vacancy rates were quite high, but in the last five years they have fallen significantly. The overall position should be seen in the context of substantial stock losses in the last 20 years, including through PDR changes.
- 20.23. This analysis has influenced the change in approach in SWH evidence to use of the property market trends method of estimating need, as described above.
- 20.24. The Council's Authority's Monitoring Report (AMR) for April 1 2018 ([AMR 001](#)) provides more detail on the historical trends in employment floorspace stock change and current local vacancy levels in the District discussed in [EMP Sept 2019](#) and summarised in the response to the M5 Qs above. Paragraphs / Tables 2.85-7 are most relevant. The AMR highlights the significant losses of stock experienced (mainly to higher land value residential use), including recent PDR office to residential conversion losses (mainly in St Albans City Centre). Paragraphs / Table 2.62- 3 show the commitments making up the current very limited land available (other than the SFRI permission, with its unique history).

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21. Question 21

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

- 21.1. Yes, the Council considers that the job capacity estimate in Policy S5 is well justified by the evidence base. For the avoidance of doubt, Plan Policy S5 does not set a 'jobs (growth) target' as such. It seeks only to provide an indication of the scale of job growth potentially arising from the land provision (Plan requirement) figure (55 Ha). This is to facilitate appropriate quantitative evidence linkages to other aspects of the Local Plan (jobs/ homes balance and infrastructure implications).
- 21.2. The estimate that the land allocation could eventually accommodate 10,000 jobs is clearly evidenced through the B use class mix, plot ratio and employment density assumptions detailed in Appendix 3 of [EMP 003](#). The jobs figure is derived from Local Plan policies for the various employment uses of the land (Local Plan Policy S6ii) and national standard evidence sources. The estimates have also been sensitivity tested. Several possible land use mix and job growth outcomes are considered. The job capacity outputs are in a range from approximately 4 -14,000. A mid-range assumption of 8,000 jobs is considered (similar to the Herts LEP EZ jobs assumptions for East Hemel (Central), but a higher figure of 10,000 is noted in the policy. This provides the best basis to build in a realistic higher assumption to test impacts. It also reflects an economic development aspiration to encourage office / mixed business premises provision, as justified by sectoral labour demand forecasts ([EMP 002](#)). This also addresses PDR losses.
- 21.3. The HLEP has a roughly comparable job generation assumption / target reflecting the capacity of the land (see response to M5 Q 22).
- 21.4. It is noted that there is no national policy or guidance that suggests a need for Local Plans to set jobs (growth) targets, even for jobs / homes balance purposes. [EMP Sept 2019](#) (Para. 4.5) comments usefully on this:
-local plan makers are no longer compelled to align their housing need figure with anticipated jobs growth. This would now be a discretionary policy decision for the local planning authority.*
- 21.5. The withdrawn 2014 PPG may have suggested a need to consider a whole plan jobs target (or more realistically, a jobs forecast compatible with the Plan). This previous guidance to integrate homes and jobs growth, by considering the labour supply and commuting / infrastructure position, has no equivalent in the 2018/19 PPG. The change is consistent with the Standard Method for housing needs assessment, which effectively priorities housing growth and essentially leaves employment land / jobs to be considered through an essentially unrelated business needs assessment.
- 21.6. The only way in which a Local Plan can seek to directly influence the quantity of jobs in the Plan area is through its allocation of employment generating land (B use classes). The majority of jobs existing in an area are not accommodated on employment generating land (in the case of the SWH area, the latest research suggests only approximately 41% of all

jobs are on such land - [EMP Sept 2019](#) - Para. 7.24). The ability of a Local Plan to have any direct bearing on an overall job target is therefore quite limited.

- 21.7. General (all jobs) targets are often set by councils and other public bodies for economic development strategy purposes. There are clearly some benefits in aligning Local Plan policy with any such targets, so that the potential contribution to economic growth from new employment generating land and premises provision can be made clear. This is the intention in Local Plan Policy S5, but the key figure is the land provision area (Plan requirement).

22. Question 22

Does the jobs target align with those associated with the Hertfordshire Enviro-Tech Enterprise Zone?

- 22.1. Yes, there is broad alignment (of assumptions and capacity estimates) of the jobs estimate (target) with those associated with the Hertfordshire Enviro-Tech Enterprise Zone. The general principles related to this question are set out in the response to M5 Q21. It is acknowledged that they are not exactly the same.
- 22.2. The Council's assumptions and capacity estimates (Appendix 3 [EMP 003](#)) relate to the whole area to be allocated. The Appendix states: *It is important to note that these capacity estimates are not tied specifically to what is expected to happen over the SLP Plan period to 2031, but rather they estimate the overall capacity of the land available.* As stated in responses to other M5 MIQs this is a long term, sub-regional scale, land allocation.
- 22.3. The Appendix does also explore the original Herts LEP assumptions for the Herts EZ 'bid', which were based on a commercial property market view of the form and job capacity of development over a 20 year period (Local Plan period and the expected lifetime of the EZ).
- 22.4. It is understood that Herts LEP / Herts EZ assumptions for the Herts EZ development programme, property mix and job capacity have evolved since the preparation of the evidence in [EMP 003](#). A job capacity figure for development expected in the 20 year period, is preferred by the LEP (8,000 jobs). They are, understandably, taking a slightly more cautious approach as they do not wish to increase the risk of perceived 'under-delivery' against job estimates. All this is considered to be entirely reasonable for their purposes and well within the range of possible outcomes. There is no substantive disagreement between the Local Planning Authorities and the Herts LEP / Herts EZ on this. The important point for the Local Plan and HLEP is that allocation of the site and subdivision of the site into areas as per Policy S5 (which is the start point for job capacity estimation), as set out in Local Plan Policy S6ii, is very strongly positively supported by the Herts LEP / Herts EZ and is factored into the ongoing Masterplanning work.
- 22.5. For implementation of the Herts EZ the Council is working closely with Herts LEP and EZ stakeholders in fully utilising EZ incentives to encourage, and prepare for, development that is very beneficial to the economic development of the sub-region. The Herts EZ gives levers that go beyond normal planning controls (promotional profile, assistance for accelerated regulatory procedures and business rate relief incentives).

23. Question 23

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

- 23.1. Yes, the Council considers that the employment land requirements are consistent with the housing requirement figure in the Plan. This is in so far as it is possible to achieve consistency through a Local Plan and land use planning actions that accord with the NPPF. The growth in housing will be generally consistent with and matched by substantial employment growth capacity and opportunity. Given the existing commuting patterns and the accessibility of London etc., there will likely be a continued net out commute from the District.
- 23.2. The Local Plan, of itself, will not result in any of the following potentially adverse planning outcomes:
- Insufficient opportunity for a growing population to find employment (Local Plan Policy S5 to secure opportunities for full employment)
 - Job growth that exceeds the available local labour supply (a failure to integrate strategies for housing and employment growth – the Jobs / home balance concept – as described in [EMP 003](#) Section 3.7 page 96 on)
 - Increased, and changed patterns of, commuting that place strain on transport infrastructure and have adverse environmental effects by encouraging car travel.
- 23.3. In the St Albans context, given the connectivity to London, realistically, the jobs / homes balance can only be addressed in a Plan at a very general level. The ability of a Local Plan to have a directly influence is limited; essentially to deciding the level and location of housing and employment land allocations and promoting infrastructure improvements.
- 23.4. It is considered crucial to emphasise that the Local Plan is led by housing provision. The housing requirement is taken directly from the need figure arrived at through the NPPF Standard Method. Some Local Plans are deliberately led by employment forecasts; the intention being that economic development and an associated employment land and / or job growth target is the driving force. Housing provision levels are then judged on a secondary basis to ensure that there is sufficient labour supply potential to meet fill the jobs available in the area. This approach can work well for main employment centres, which usually have a net in-commute position. The context for St Albans is very different and that approach is considered certainly not to be appropriate for this Local Plan. This is also an underlying reason why the Local Plan does not have a specific jobs 'target' (see response to M5 Q 21 above).
- 23.5. As noted in the response to M5 Q21 above NPPF 2012 / PPG 2014 included some specific policy and guidance on achieving an integrated ('consistent') approach to housing and employment land provision. However, this has been removed from NPPF and PPG 2018 / 19. The implications of this change are discussed in the most recent SWH evidence on economic development and employment land ([EMP Sept 2019](#) Paras. 4.5 / 6):

..... plan makers are no longer compelled to align their housing need figure with anticipated jobs growth...

..... This effectively means that a council's employment land and housing policies no longer need to be aligned, as was the case under the previous method. However, this still needs to be a consideration – if there was a significant misalignment between an area's employment land and housing policy it could give rise to labour market imbalances such as skill shortages and could also lead to unsustainable commuting patterns.

- 23.6. The NPPF 2012 approach was addressed, using EEFM forecasts, in evidence originally prepared to support the former SLP ([EMP 003](#)). This evidence is still relevant in general terms. The conclusions drawn were that there was a very complex pattern of commuting affecting the District and a strong net out-commute position (minus approximately 14% of the resident workforce). Effectively this means there is currently a theoretical excess of local labour supply over local jobs, partly due to the dormitory role of the area for London employment.
- 23.7. The EEFM employment forecasts (which are integrated with ONS 2014 based population projections, reflecting the housing requirement being applied then) showed a theoretical reduction in the net out-commute, as more jobs were expected to become available locally ([EMP 003](#) Section Table 15). As a result, there was considered to be no reason to be concerned about insufficient labour supply increases to fill new jobs created through Local Plan employment land allocations. Commuting patterns were expected to change, but in the context of the existing complexity of flows the changes would be relatively insignificant. Such change would be well supported by existing infrastructure, particularly high quality radial rail links, which can reduce dependence on private car borne commuting. Even if it were assumed that the net out-commute is embedded (fixed in the forecasts) there would only be a relatively small shift towards a tighter labour supply position. This was not judged sufficiently serious to justify additional housing provision.
- 23.8. This analysis has been revisited in the context of the potentially much higher levels of population and household growth under the Standard Method determined Local Plan housing requirement. This has been facilitated by the SWH joint studies that consider the FEMA wide position (a more realistic approach given the complexity of economic linkages in the area).
- 23.9. The previous NPPF 2012 and former draft SLP conclusion is inevitably reinforced given that the additional housing will allow for significant increases in the working age population. The most recent evidence ([EMP Sept 2019](#) Section on Labour Supply Scenario – Para.7.43 on) models the potential future jobs / homes balance with this increased population growth and a fixed commute position.
- 23.10. [EMP Sept 2019](#) Table 7.8 summarising this modelling is reproduced below:

Growth in workforce and jobs in Labour Supply Scenario, 2018-2036

	Change in employed residents	Employed residents to jobs ratio	Change in workplace employment	Double jobbing rate	Change in jobs	Average growth rate
Dacorum	19,000	1.11	17,100	3.3%	17,700	1.2%
Hertsmere	13,400	1.07	12,500	3.5%	13,000	1.3%
St.Albans	17,900	1.16	15,500	4.2%	16,200	1.2%
Three Rivers	11,100	1.24	8,900	4.7%	9,300	1.1%
Watford	16,700	0.92	18,000	4.0%	18,800	1.5%
South West Herts	77,900	1.10	72,100	3.8%	75,000	1.3%

23.11. The Study (paragraph 7.45) sets out that:

(Increased housing growth/ population) results in substantial jobs growth of 75,000 between 2018 and 2036, representing a growth rate of 1.3% p.a. This is significantly higher than the same scenario in the 2016 study which is due to the new standard method for calculating housing need which results in much higher population growth than was the case under the earlier approach.

23.12. The jobs growth figures in this scenario result from an assumed direct relationship between labour supply and job creation. This is partly justifiable in respect of service jobs, but for other types of employment, such growth would need to be driven by more fundamental economic change and job creation. Unsurprisingly, given the scale of housing growth planned, the scenario shows the position to have reversed over the [EMP 003](#) analysis; with a more than sufficient labour supply and a potential shortage of local jobs. This will create pressure for greater local job creation or acceptance of increased net-out commuting. Given the dominance of London as an employment centre in SE England the latter outcome perhaps represents a plausible future. This position is also supported in infrastructure and environmentally benign travel terms by the radial rail routes.

23.13. The Study also explores this type of future; as a 'lower growth labour supply scenario' where out commuting is assumed to increase ([EMP Sept 2019](#) Para 7.51 on).

23.14. The position for the District alone can also be illustrated in a simple, but effective, way by considering the broad parameters of job growth on the basis of an assumption that, on average, every new household will provide labour supply for one FTE job (the oft used 1 job to 1 home 'rule of thumb'):

TABLE Q20ii

EEFM employment growth position on the basis of 1-1 new household / new job relationship

EEFM 2017 baseline forecast key parameters	EEFM 2018	EEFM 2036	LP dwelling growth taken as new households (population at 2.3 HH size)	Addition-al job require- ment at 2036 based on 1:1 Ratio	Overall Jobs to home ratio 2036	Notes
1. Population (house- holds)	148,100 (59,300)	163,000 (67,100) +14900 (+7,800)	+14,870 (r) (population growth +34,200)	15,000 (r)		EEFM is ONS projection 2014 based
2. Working age population	89,700	91,600				
3. Workplace employed people	78,500	83,300				
4. Residence employed people	76,100	83,800		83,800 +15,000 = Total residence employed 98,800	83,800 / 67,100 = 1.24 jobs per HH	
5. Net commute (= 3-4)	+2,400	-500		15,500 Split as: 40% on EG land = 6,200 60% general = 9,300		EEFM shows current and future rough jobs / homes balance in net commute terms
				+3,800		EG land balance position assuming 10,000 new jobs at East HH Hemp- stead

23.15. The estimates here illustrate that, with the population growth now planned, and an assumption that one new job is needed per new household, 15,500 additional local jobs will

be required to maintain the EEFM forecast position (which shows an approximate balance of jobs and homes in 2036).

23.16. For jobs on employment generating land alone the 10,000 estimated capacity is more than adequate to accommodate the growth theoretically required. However, if the commute position were to be fixed, then the local job need would be correspondingly higher.

23.17. This can be looked at another way; this time including the net out-commute effect (held constant):

Table Q20iii

Employment supported by Local Plan housing requirement (using EEFM sectoral employment growth forecasts)

	Analysis	2018	2036	Change
1.	LP population (households)	148,100 (59,300)	182,300 (74,170)	+34,200 (+14,870)
2.	LP 16-64 working age population	89,700 (60.57% of population)	102,434	+12,734
3.	16-64 employment rates	84.84% (from EEFM)	90.00% (EEFM rounded - represents expected increasing propensity to work in older age groups)	
4.	Residence based employment	76,100 (from EEFM)	92,191 (2. x 3.)	
5.	EEFM 2011 census net out commute 13.79 %	-13.79 %	-13.79 %	
6.	Net out commute employment at 2011 rate (4.-5.)	-10,494	-12,713	
7.	Workplace employment needed in Plan scenario (4.-7.)	65,606	79,478	+13,872
8.	Workplace employment forecast by EEFM (on local sector growth expectations)	78,454	82,318	+4,864
9.	Job balance (shortfall of local employment opportunities) <i>This suggests an increasing net out-commute with the District providing a workforce for other areas, likely to mainly be London</i>			-9,008

- 23.18. On this basis a shortfall of local job opportunities arises, reinforcing the long standing net out commute position.
- 23.19. The District only estimates above can only be illustrative of a general trend, as in reality new employment opportunities from the Local Plan land allocations will be available to labour in a much wider area than the District alone.
- 23.20. So, with the population growth envisaged in the Local Plan, local labour supply is more than sufficient for the job growth envisaged, including that arising from the major employment generating land allocation in the District. On the 'other side of the coin', as the planned new employment area will serve SWH overall, a theoretical need to create primary (rather than service) employment arises. This offers a significant challenge for economic development. This conclusion is reinforced by considering that the overall job to home ratio in 2036 under the EEFM is 1.24 rather than the 'rule of thumb' assumed 1 (however note that the EEFM does tend to overestimate the job number baseline and thus also growth – see [EMP Sept 2019](#)).
- 23.21. Overall therefore, the Council considers that the employment land requirements are consistent with the housing requirement figure in the Plan. This is in so far as it is possible to achieve consistency through a Local Plan and land use planning actions that accord with the NPPF. The growth in housing will be generally consistent with and matched by substantial employment growth capacity and opportunity.

Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.

24. Question 24

Does the plan allocate sufficient land to meet the identified minimum need in policy S5?

- 24.1. Yes, the Council considers that the Plan allocates sufficient land to meet the identified minimum need in policy S5. The responses to M5 Qs 20-23 address this issue in detail.
- 24.2. It is considered important to note again that assessed 'need' and a Plan land requirement are related but separate concepts and planning considerations. There is no automatic 'match' between need and land requirement. Also, Local Plan Policy S5 does not use a minimum need figure; it uses a specific land allocation requirement and related indicative jobs figure. Provision for significant development and redevelopment opportunities are also made in the Special Employment Locations in the Green Belt (Policy L11) at Rothamsted and the BRE.
- 24.3. Employment land 'need' has been assessed comprehensively, with updated evidence studies at several stages of the Plan-making process. Policy S5 and S6 Plan requirement and provision proposals exceed need significantly on a District only basis (by varying amounts according to different methodologies and timeframes), but are fully justified and supported at the sub-regional level. All adjoining and nearby Local Planning Authorities, the Herts LEP, Herts EZ and HCC support the approach of making a high level of provision at East Hemel as an expansion of Hemel Hempstead (and in the EZ at Rothamsted and the BRE). This is an important contextual consideration for a response to this question.

Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.

25. Question 25

Does the land allocated provide sufficient choice and flexibility?

- 25.1. Yes, the Council considers that the land allocated in the Plan provides sufficient choice and flexibility. The responses to M5 Qs 20-24 above address this issue generally.
- 25.2. For emphasis, in relation to the land allocated, as opposed to existing protected employment areas (Policy L9/10):
- Local Plan Policy S6ii clearly requires a mix of premises types in the Herts EZ 55 ha land allocation at East Hemel Hempstead. The additional EZ land at Rothamsted and the BRE (see also Policy L11) further increases choice and flexibility. Land is to provided for the full range of B class uses; with office, shed and mixed business use / research and development premises.
 - The sheer scale of the East Hemel Hempstead allocation means there is plentiful land availability. This, in itself, provides choice and flexibility. The allocation is big enough to accommodate very varied premises offers. This can include typical speculative commercial development alongside opportunities for direct business ownership or commissioned building pre-lets. This will allow the Herts EZ to respond to changing local markets and specific inward investment enquiries. For example, it is understood that there has already been significant potential occupier interest for a range of uses, including directly for uses responding to the S6ii requirement for “Full exploration of possibilities for an offsite construction facility (primarily for modular housing) within the logistics and mixed industrial area”.
 - The East Hemel Hempstead allocation is accessible and attractive in a variety of commercial property markets. It can serve a wide FEMA / property market area. The location provides a multi-faceted, new and exciting economic development opportunity, with excellent motorway and airport access and close proximity to an existing major business centre (Maylands - see [EMP 003](#) Section 6.2). The new land is in a town offering a strong business community and labour market. There are also excellent business and residential services / facilities and will be top class environmental amenities.
 - The direct involvement of the public sector (Crown Estate ownership, the HLEP Herts EZ and their funding arrangements and opportunities) creates opportunities for provision in sectors that require more affordable land to achieve property outcomes. Typically, this is in provision of small business small unit accommodation with flexible commitment / rental terms or speculative development aimed at small business purchase. Again, it is understood that there has already been significant potential occupier interest directly responding to the S6ii requirement for “The first phase of employment development will be required to provide some starter units / incubator space”.
- 25.3. This approach clearly meets the requirements of NPPF Paragraphs 81 and 82 (key extracts below with points from the Local Plan noted in brackets):

...set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration (HLEP HETEZ locations)...

... identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period (large new land allocation to allow growth)...

...be flexible enough to accommodate needs not anticipated in the plan, ... enable a rapid response to changes in economic circumstances (ample land allocation with the potential for availability extending beyond the Plan period).

...recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations (Herts EZ environmental technology theme, the east Hemel Hempstead business centre expansion and research and development cluster approach (RR and BRE). A highly accessible location for a main employment land allocation. Sufficient land for space intensive uses, including distribution).

25.4. It is acknowledged that the high reliance on the allocation at East Hemel does not offer pure locational flexibility and choice. It is important to recognise that the land allocation at East Hemel Hempstead is complemented in the Plan by the allocations at Rothamsted and the BRE in Policy L11 - Special Employment Locations in the Green Belt. Additionally, the Plan also therefore supports these allocations by:

- Policies to retain existing, essential, local, employment areas elsewhere in the District. These will offer some scope for intensification of employment uses and redevelopment. The relevant areas are defined in Local Plan Policy L9 - Primarily Business Use Areas.
- Specific designation / protection of the main office areas making up the important St Albans City Centre office centre within Local Plan Policy L10 - Strategic Office Locations (the 'City of Excellence' promotional initiative is related to this - [EMP 003](#) Section 2.3). In these areas there is some scope for new office development and intensification (illustrated by emerging schemes at the Maltings and the Civic Centre Opportunity Site – South; details will be in AMR 2019 due for publication shortly)
- Article 4 Direction protection in these areas already in place in accordance with the aims of Local Plan Policy L9 (see details in response to M5 Q20)

25.5. For an authority wholly bounded by the Metropolitan Green Belt, the proposed Local Plan policies are considered the best reasonably available options to provide sufficient choice and flexibility for employment land.

Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.

26. Question 26

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

- 26.1. The responses to M5 Qs 19-25 and responses to the M2 Qs regarding the DtC address this issue in detail.

Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.

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

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St Albans Housing OAN (September 2017*) – 2016 base date

Households 2016	Households 2026	Total Change (2016-2026)	Average Annual Change	Affordability Ratio 2016	Uplift	Adjustment Factor	OAN Uncapped (dpa)	OAN Capped (40% Cap) (dpa)
59,043	65,565	6,522	652	16.76	80%	180%	1,172	913

*17th March 2017 Housing affordability ratio data release date

NB: 2016 as the base date for the ten year household projections (2014-based) period (2016 to 2026) and the 2016 affordability ratio.

St Albans Housing OAN (26th April 2018)

Households 2018	Households 2028	Total Change (2018-2028)	Average Annual Change	Affordability Ratio 2017	Uplift	Adjustment Factor	OAN Uncapped (dpa)	OAN Capped (40% Cap) (dpa)
60,383	66,827	6,444	644	16.59	79%	179%	1,151	902

NB: the base date for the ten year household projections (2014-based) period was 2018 (2018 to 2028) using the 2017 affordability ratio.

St Albans Housing OAN (28th March 2019)

Households 2019	Households 2029	Total Change (2019-2029)	Average Annual Change	Affordability Ratio 2018	Uplift	Adjustment Factor	OAN Uncapped (dpa)	OAN Capped (40% Cap) (dpa)
61,063	67,462	6,399	640	16.81	80%	180%	1,152	896

NB: the base date for the ten year household projections (2014-based) period was 2019 (2019 to 2029) using the 2018 affordability ratio.

M5Q5 Appendix 1

	Land Supply - To 1 April																		Total
Description	2018/19	5 Year Land Supply					2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	
Under construction	300	220	259	178	135	126	147	10	0	0	0	0	0	0	0	0	0	0	1,375
With planning permission (full or reserved matters covering whole site)	0	0	11	72	187	65	62	31	27	0	0	0	0	0	0	0	0	0	455
Small Sites with permission*	48	60	62	59															229
Conversions with permission*	33	54	55	35															177
With outline permission with part(s) covered by reserved matters																			0
Outline only	0	0	0	8	-2	16	10	10	0	0	0	0	0	0	0	0	0	0	42
Where full. Outline or reserved matters at post committee resolution or subject to S106 negotiations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
With application submitted	0	0	-24	20	27	28	53	49	40	0	0	0	0	0	0	0	0	0	193
With pre-application discussions occurring	0	0	6	0	3	24	14	7	10	10	10	0	0	0	0	0	0	0	84
Allocation only	0	0	0	0	0	11	11	18	0	0	0	0	0	0	0	0	0	0	40
SHLAA Sites and other sites	0	0	0	0	0	0	10	30	0	0	0	0	0	0	0	0	0	0	40
Garage Sites Program	27	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	32
Windfall Allowance	0	62	92	105	111	123	123	123	123	123	123	123	123	123	123	123	123	123	1,968
Office to Residential Prior Approval (10% discount**)	225	111	5	0	38	0	0	0	0	0	0	0	0	0	0	0	0	0	379
Unanticipated delay factor***	0	-65	-65	-65	-65	-65	0	20	24	25	32	32	32	32	32	32	32	32	0
Total	633	441	407	411	434	328	430	298	224	158	165	155	155	155	155	155	155	155	5,014

*90% assumption on unstarted permissions **10% discount on unstarted permissions ***Unanticipated delay factor on unstarted permissions

Local Plan / NPPF Policies - Delivering Urban Optimisation

[illegible]

Local Plan - Inc. Broad Locations

	Pre plan period		Plan Period																		Post plan
	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		
Current known/expected delivery (2020-2036)	633	441	407	411	434	328	430	298	224	158	165	155	155	155	155	155	155	155	3,939		
East Hemel Hempstead (North) (1,650 not inc. circa 120 at Spencers Park PII)						75	140	180	180	180	180	180	180	140	100	65	50		1,650		
North Hemel Hempstead (1,500)													75	125	125	125	125		575	925	
East Hemel Hempstead (South) (2,400)						75	140	180	180	180	180	180	180	180	180	180	180	180	2,195	205	
North West Harpenden (580)					75	75	75	75	75	75	75	55							580		
East St Albans (902 + 348 already permitted)						75	100	100	100	100	100	100	100	100	25				900		
North St Albans (1,100)					75	120	120	120	120	120	120	120	120	65					1,100		
North East Harpenden (760)									75	75	75	75	75	85	75	75	75	75	760		
West of London Colney (440)								75	75	75	75	75	65						440		
West of Chiswell Green (365)							75	75	75	75	65								365		
Park Street Garden Village (2,300)	0	0	0	0	0	0	0	0	80	150	180	180	180	180	180	180	180	180	1,670	630	
LP / NPPF - Delivering Urban Optimisation	0	0	0	0	0	0	0	0	80	80	80	80	80	80	80	80	80	80	800		
Trajectory Total	633	441	407	411	584	748	1,080	1,103	1264	1,268	1295	1200	1135	1060	920	860	845	795	14,974	1,760	

NB: Trajectory Average 2020-2025; 2025-2030;
2030-2036

NB: Housing Requirement/Target - inc. 20% buffer for 2020-2025 and remainder averaged over 2025-2036						535					1,085						1,085	913
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Explanation of the updated approach underpinning the Housing Trajectory 1 April 2019 base date, as at M5Q5 Appendix 1

M5Q5 Appendix 2 sets out the Council's approach to the updated Housing Trajectory 1 April 2019 base date (M5Q5 Appendix 1). It outlines the updates included from the Local Plan Appendix 2 – Housing Trajectory 1 April 2018 base date.

Minor factual error corrections

Minor factual errors in Local Plan Appendix 2 – Housing Trajectory have been corrected in the updated Housing Trajectory 1 April 2019 base date and highlighted in green.

- 1,600 dwellings to be delivered in East Hemel Hempstead (North) Broad Location during the plan period, has been corrected to 1,650 dwellings included in Proposal 2 of Local Plan Policy S6 i.
- 1,000 dwellings to be delivered in North St Albans Broad Location during the plan period, has been corrected to 1,100 dwellings included in Proposal 2 of Local Plan Policy S6 vi.
- 1,000 dwellings to be delivered in North Hemel Hempstead Broad Location post plan period (beyond 2036), has been corrected to 925 dwellings. This post plan figure is the difference between the total delivery of 575 dwellings during the plan period and the minimum capacity of 1,500 dwellings included in Proposal 2 of Local Plan Policy S6 iv.
- The post plan total has been updated to 1,760 dwellings to reflect the corrections above.
- A duplicate 'Council Owned Sites' row below 'Office to Residential Prior Approval 10% discount' and above 'Unanticipated delay factor' was included in error. This row has been removed from the 1 April 2019 baseline Trajectory.

Updated approach to student accommodation and housing for older people (C2 Use Class)

The Government published updated PPG guidance on 'Housing for older and disabled people' on 26 June 2019 (Paragraph: 007 Reference ID: 63-007-20190626 and Paragraph: 016a Reference ID: 63-016a-20190626). Additional updates to the PPG on 'Housing supply and delivery' were published on 22 July 2019 (Paragraph: 034 Reference ID: 68-034-20190722 and Paragraph: 035 Reference ID: 68-035-20190722). With reference to the PPG updates above, the Council has included all student accommodation and housing provided for older people (including care homes and residential institutions) in Use Class C2, as part of the housing land supply in the 1 April 2019 baseline Housing Trajectory.

Windfall Allowance

The 'Windfall Allowance' row has been updated, following the same approach underpinning Local Plan Appendix 2 – Housing Trajectory 1 April 2018 baseline.

Unanticipated Delay Factor

The 'Unanticipated Delay Factor' row has been updated, following the same approach underpinning Local Plan Appendix 2 – Housing Trajectory 1 April 2018 baseline.

Other Updates

There has been significant passage of time between the publication of the Draft Local Plan for Consultation at Regulation 19 stage in September 2018, the submission of the Local Plan to the Planning Inspectorate for Examination in March 2019 and the commencement of the Local Plan Examination hearing sessions in January 2020. Due to the passage of time, the estimated date of adoption for the Local Plan is likely to be moved back beyond Spring 2020. Consequently, it is considered appropriate to move the Local Plan / NPPF Policies - Delivering Urban Optimisation categories back by one year to start from 2026/27 instead of 2025/26.

For the 'Local Plan / NPPF Policies - Delivering Urban Optimisation' sub-categories of 'Intensification / Conversion of Employment Land', 'Council Owned Sites' and 'Increased Density in Higher Buildings', a total of 80 dwellings for the period 2025/26 has been removed. This results in a change to the total for 'Local Plan / NPPF Policies - Delivering Urban Optimisation' during the plan period, resulting in a new total figure of 800 dwellings, which is highlighted in green. This is an update to the previous total of 880 dwellings in Local Plan Appendix 2 – Housing Trajectory 1 April 2018 baseline.