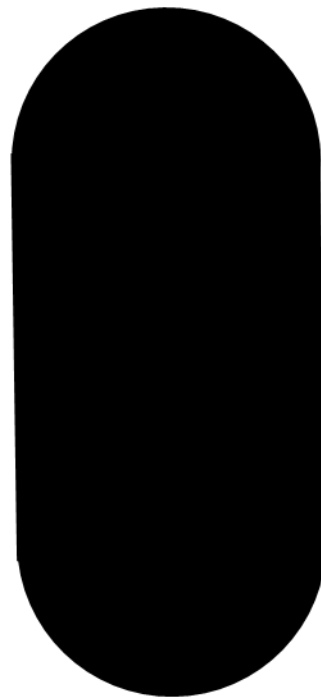
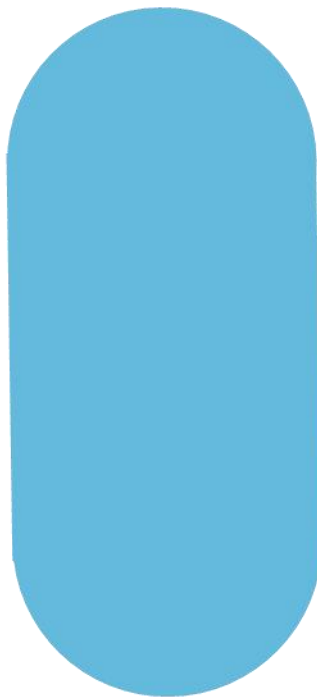
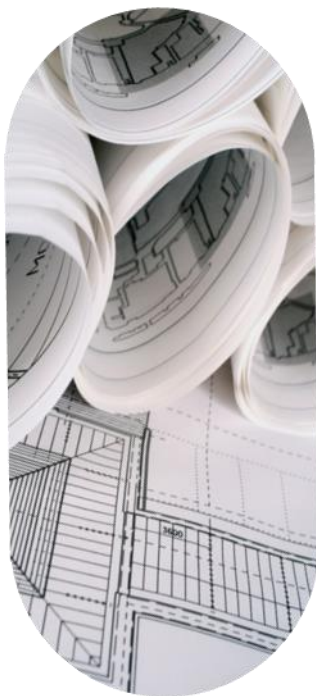


**WRITTEN STATEMENT IN RESPECT OF THE ST ALBANS CITY  
AND DISTRICT LOCAL PLAN EXAMINATION**

**MATTER 8- THE SUPPLY AND DELIVERY OF HOUSING LAND**

On behalf of Martin Grant Homes and Kearns Land Ltd



## 1. INTRODUCTION

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

### MATTER 8- THE SUPPLY AND DELIVERY OF HOUSING LAND

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

- 1.3 *Issue – Whether the approach towards the supply and delivery of housing land is justified and effective and consistent with national planning policy.*

*1. What is the estimated total supply of new housing in the plan period and how does this compare with the planned level of provision?*

- 1.4 The Local Plan Trajectory (CD02: Appendix 2) identifies 14,871 homes between 2020/21 to 2035/36. Policy S4 sets a housing requirement/target of 14,608 homes during the same period.

- 1.5 The trajectory also includes 2017/18 to 2019/20 (labelled as the pre-plan period). In our view, the plan should be based upon the standard methodology calculation of 913 homes for the period 2017/18 to 2035/2036 resulting in a total housing requirement of 16,434 homes (see Martin Grant Homes and Kearns Land Matter 5 statement).

- 1.6 The Council's trajectory shows 16,157 homes during the period 2017/18 to 2025/36. This amounts to a shortfall of 277 homes.

- 1.7 Notwithstanding the comments above, it should be noted that the Council refers to a 'housing requirement/target' in Policy S4. The modified plan (ED25F) discusses supply at S4.1 and says that the plan 'can deliver' 14,608 dwellings in the period to 2036 (S4.2). It is not apparent from the wording that the Council has adopted whether the housing requirement/target is setting the 'provision' figure for the plan or whether the trajectory is driving provision.
- 1.8 The relationship between the standard methodology calculation for housing for the whole plan period and the provision driven by the trajectory is also not clear (see Martin Grant Homes and Kearns Land Matter 5 statement).

#### *4. Is the housing trajectory realistic?*

- 1.9 The Local Plan strategy seeks to deliver housing through a number of 'Broad Locations'. This strategy must be considered in the context of paragraph 23 of the Framework which makes clear that with regards to broad locations for development, *"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development."*
- 1.10 Unfortunately, there is insufficient evidence to support the strategy for meeting the Council's housing requirement predominantly at these Broad Locations. The Broad Locations are large-scale, often mixed-use developments which will have a number of onerous infrastructure requirements. The PPG makes clear that LPAs need to demonstrate that they have engaged with infrastructure providers, ensuring that they are aware of the nature and scale of such proposals, and work collaboratively to ensure that the infrastructure requirements are not beyond what could reasonably be considered to be achievable within the planned timescales (Reference ID: 61-056-20180913). This evidence is lacking from the

LPPD. Appendix 4 of the local plan (ED25F) sets out the infrastructure delivery schedule. This serves to show how complicated some of the sites will be but does not set out details relating to the timescales for or progress made towards delivery of infrastructure.

- 1.11 There appears to be a distinct lack of evidence submitted in respect of the delivery of the dwellings contained in the trajectory. We have not seen any evidence that explores lead in times and delivery rates in the context of the milestones for major developments.
- 1.12 From our review of the broad locations only S6v East St Albans has the benefit of a permission. No applications (other than scoping opinions) appear to be in the process of being determined by the Council and given that the broad locations at S6i East of Hemel Hempstead (North), S6iii East of Hemel Hempstead (South), S6viii North West Harpenden, S6vi North St Albans and S6x Chiswell Green are all expected to contribute towards the supply of homes in the first five years of the plan the Council will need to explain the progress being made and establish whether the plan is capable of satisfying paragraph 67 of the Framework.
- 1.13 The majority of the broad locations are expected to deliver complicated developments, for substantial numbers of homes accompanied by significant infrastructure. In the absence of applications, and any understanding about the governance processes or progress being made to bring the schemes forward in multi-agency master plan-led environments there might be considerable doubt that the sites will deliver units as early as 2022/23 or 2024/25 and contribute towards a five year supply.
- 1.14 The lack of clarity over the delivery arrangements also leads to concern that the plan will be unable to meet the need for homes and be deliverable over the plan period and consequently concerns that the positively prepared and effective tests at paragraph 35 of the Framework
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can be satisfied.

*5. The majority of the proposed housing will be provided on a small number of large sites. Does the Council have a contingency Plan should one or all of these sites not deliver as expected?*

1.15 Appendix 3 of the Local Plan sets out the Monitoring Framework. It does not set out any triggers for actions being required in the event of poor performance nor identify the action that would be taken in those circumstances.

1.16 The Plan does not include any triggers for dealing with unmet need, from this plan or from the wider housing market area.

1.17 Taken together, there are serious concerns that the plan does not contain strategic policies that, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. As a result the plan is not capable of being considered to be in conformity with paragraphs 11b and 35a of the Framework.

*6. Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 73 of the NPPF?*

1.18 Yes. The trajectory shows under delivery against the standard method figure for housing need of 913 homes a year as follows for the first 3 years of the plan:

- 2017/18: 432 homes delivered – under delivery by 481 homes
- 2018/19: 426 homes delivered – under delivery by 487 homes
- 2019/20: 428 homes (anticipated) to be delivered – under delivery (anticipated) by 485 homes

- 1.19 This amounts to 1,286 homes delivered against a requirement for 2,739 homes in the same period; under delivery of 1,453 homes (c.50%). It is our view that this constitutes under delivery and that a 20% buffer for the five year supply of sites is appropriate.

*7. What are the implications of stepped delivery of housing on the supply and delivery of housing?*

*8. What impact will this have on the 5 year supply of deliverable housing land and the delivery of affordable housing?*

*9. On the basis of the Plan as submitted, is it realistic that it would provide for:*

*a) A supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption?*

*b) A supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?*

*If you contend that the Plan would not provide for either (a) or (b) above (or both) could it be appropriately modified to address this?*

- 1.20 The Council does not appear to have undertaken a rolling five year supply assessment for the plan period – either for the need of 913 homes a year or for a stepped trajectory. The Council should prepare this assessment prior to the hearing sessions to enable it to be considered by participants as part of the examination process.

*10. In overall terms would the Plan realistically deliver the number of dwellings required over the plan period?*

- 1.21 No. In our view, the anticipated delivery of homes is far too optimistic. We are also mindful that the plan is not making sufficient provision to meet the housing need for the whole plan period. Taken together with the

absence of evidence to support anticipated housing delivery we remain of the view that the plan will not realistically deliver sufficient homes over the plan period.

*14. Is there sufficient variety in terms of the location and type of sites allocated?*

- 1.22 No. The Local Plan does not provide for an appropriate balance of sites in the context of the Framework: paragraph 68. Choice and flexibility in the housing provision, through small and medium sized sites, is essential for meeting the housing requirement of the area. Unfortunately, the delivery of housing through medium sized sites is not adequately planned for with the smallest site being 365 homes in one of the six large villages (and no land release at the other villages identified as Green Belt Settlements).
- 1.23 Whilst other unspecified contributions are expected (from conversions, garage sites, office to residential prior approval, council owned sites and other windfalls) only 365 homes out of 14,871 homes contained in the trajectory (2.4%) are evidenced as being positively planned for on anything other than a large site at a broad location at a city, town – main urban settlement.