

Ms Louise St. John Howe
Local Plan Programme Officer
PO Services
PO Box 10965
Sudbury
SUFFOLK CO10 3BF

10/12/19

Dear Ms St. John Howe,

Re: St Albans District Council - Hearing Statement – Matter 8: The Supply of Housing Land

1.0 Introduction

1.1 This Hearing Statement has been prepared on behalf of London Colney Limited which has a land interest at 'Land South of Alban Way, rear of 113 to 167 Colney Heath Road, St Albans, AL4 0TN' (referred to as '*the site*') (Ref: SHLAA-GB-SA-581). To avoid the need to repeat previous arguments the following representations and correspondence should be read in conjunction with this statement:

- **April 16:** 'Site Opportunity at Land South of Alban Way' (response to Call for Sites consultation Feb-April 2016)
- **Dec 16:** 'Land South of Alban Way' (response to Detailed Local Plan Draft DLP Nov - Dec 2016)
- **Sept 17:** 'Site Opportunity at Land South of Alban Way' (response to Call for Sites consultation August – Sept 2017)
- **Feb 18:** 'South of Alban Way – Call for Sites Report' (response to Local Plan consultation Jan-Feb 2018)
- **25 July 18:** Letter to Mr Briggs (response to error to site boundary and request to SADC to repeat site assessment using correct site boundary)

- **Oct 18:** 'Land South of Alban Way' (response to Local Plan 2020-2036 Publication Draft 2018 Consultation 'draft Local Plan').

2.0 Matter 8: The Supply of Housing (Policy S4 'Housing Strategy and Housing Requirements')

- 2.1 Policy S4 'Housing Strategy and Housing Requirements) has not been positively prepared, nor is it justified, or if adopted would be effective in delivering enough housing to meet the Borough's Local Housing Needs (LHN). The 'St Albans District Council (SADC) Local Publication Draft (2018) (LPD) is not consistent with national policy. GL Hearn concludes that upon examination an Inspector would not find the plan 'sound'. The delay in adopting a 'sound' plan would very likely leave the Borough vulnerable to sporadic and unsustainable patterns of development and therefore we respectfully request that the appointed Inspectors discharges their duty under Regulation 23 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and recommends that SADC identifies further land for housing adjacent to the major settlements.
- 2.2 We advise SADC reconsiders allocating Park Street Garden Village Broad Location (BL) (former aerodrome) which is planned to provide a minimum of 2,300 dwellings, the highest concentration of housing of the nine BLs. The site is subject to an extant outline planning consent for a new Strategic Rail Freight Interchange (SRFI) and a dispute between the operator and SADC will likely to result in court action which will compromise the ability of SADC to meet a significant proportion of its Local Housing Need (LHN).
- 2.3 SADC's stepped approach to meeting LNH (in reference to the housing trajectory) over the plan period is not justified and should be reconsidered to include specific and deliverable sites for years one to five of the plan. If adopted in its present form the plan would likely result in an unsustainable pattern of development as any application refused on a site outside the existing urban areas could be allowed on appeal given the lack of a 5-year housing land supply (with appropriate 20% buffer).
- 2.4 The delivery rates for the East Hemel Hempstead South 'BL' and Park Street Garden Village 'BL' are unrealistic (both 180 dpa) and do not reflect the likely rates of delivery for a strategic site of this kind. Based on empirical evidence undertaken by Savills on behalf of Barratt Homes (see Urban Extensions – Assessment of Delivery Rates, October 2014 – **Appendix 1**) BLs are only likely to deliver up to 120 dpa. The expected delivery rate of up to 120 dpa is

supported by observations of 78 urban extensions on greenfield sites. 32% of case studies had been located within the south east of England and are an accurate proxy for estimating expected housing delivery rates at East Hemel Hempstead South 'BL' and Park Street Garden Village 'BL'. SADC has not provided any evidence to suggest that delivery rates will exceed 120 dpa and therefore the housing trajectory in Appendix 2 of the LPD is likely to fall even shorter in meeting the housing requirement target of 14,608 over the 16-year plan period.

- 2.5 The start date of the LDP Housing Trajectory 'Appendix 2' does not comply with the methodology set out in the NPPF (2019). **Paragraph 22** of the NPPF (2019) states that Plans should look ahead over a minimum of 15 years from adoption and **Part (a), page 66** further explains *"sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years"*. Therefore dwellings 'under construction' in years beginning 2017/18 to 2020/21 should be discounted as they fall outside the plan period.
- 2.6 With the exception of East Hemel Hempstead South 'BL' and Park Street Garden Village 'BL' the delivery rates at the remaining 'BLs' would appear consistent with the findings of the research undertaken by Savills/Barratt Homes (see 2.4 above). Nonetheless SADC will need to allocate more specific and deliverable sites particularly in years one to five and only then might the plan be considered 'sound'.
- 2.7 The 'Land South of Alban Way' (Ref: SHLAA-GB-SA-581) is available now and offers a suitable location immediately adjacent to the settlement boundary of St Albans and if allocated assist SADC meets its LHN with up to 500 dwellings in years one to five.

Yours sincerely

Selwyn Atkinson BSc (Hons) MPhil (Cantab) MRTPI

Planning Associate Director

selwyn.atkinson@qlhearn.com

020 7851 3750