

The St Albans City & District Strategic Local Plan: A Local Housing Target

Background

The District Council is currently working on the preparation of the following Development Plan Documents (DPDs), which together will form the new Local Plan for the District, ultimately replacing the 1994 Local Plan:

- Strategic Local Plan (SLP) – overarching policies, principles and spatial vision. The level and location of sustainable development (formerly known as the Core Strategy)
- Detailed Local Plan (DLP) – detailed policies; including site allocations, new proposals maps and comprehensive suite of policies.

The SLP is based on its community's vision contained in the Sustainable Community Strategies for St Albans and Hertfordshire. It must also comply with other legal requirements, including the need to have regard to the Government's national planning policy, including the National Planning Policy Framework and to be based on proportionate and justifiable evidence.

On 27 March 2012, Department of Communities and Local Government (DCLG) published the final version of the NPPF. It came into effect immediately, superseding nearly all other planning guidance and can be seen at <http://www.communities.gov.uk/publications/planningandbuilding/nppf>

The SLP and subsequent DLP need to strike an appropriate balance between Economic, Environmental and Social aims, within the parameters of the NPPF and other planning policy and law, based on an evidence base and with confidence in delivery, in order to deliver sustainable development. This is then tested at an independent Examination In Public, where the concept of "soundness" is tested (see NPPF paragraph 182). As indicated by responses to previous consultations, it is likely that the most contested element will be the level of sustainable housing development, especially in relation to the Green Belt.

Any figure SADC use as a housing target in the SLP will have to have been publicly consulted upon prior to the Pre-submission stage and subject to Sustainability Appraisal. At present, the Regional Plan figure of an average minimum of 360 dwellings per annum and the Locally Derived Housing Target of 250 dwellings per annum could be taken forward to the Pre-submission stage.

Both of these figures are substantially lower than the current traditional Office for National Statistics (ONS)/Department for Communities Local Government (DCLG) population/household projection figures. Any other figure would have to be based on an appropriate evidence base and then consulted upon.

The Government's latest household projections for St Albans City and District - the Department for Communities and Local Government (DCLG) 2008-based sub-national household projections, suggest that there will be a requirement for 11,700 new households in the district over the plan period (to 2028). This equates to 688 households per annum, significantly higher than the adopted Regional Spatial Strategy housing requirement for St Albans City and District to deliver 360 households per annum.

The majority of Councils, including all Hertfordshire councils at advanced stages of their Local Plans, are currently making progress based either wholly or very close to their Regional Plan target or their ONS/DCLG projections.

Sustainable Development

The NPPF has replaced the previous guidance in PPS12 and PPS3 and in simple terms moves the Government's planning agenda to one of Sustainable Development. The definition of what constitutes sustainable development is 201 paragraphs long; i.e. the document almost in its entirety.

6 The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.

7 There are three dimensions to sustainable development: economic, social and environmental.

8 These roles should not be undertaken in isolation, because they are mutually dependent.

Competing Aspirations Within The NPPF

The NPPF sets out its presumption in favour of sustainable development very clearly at paragraph 14. Included within the paragraph is the real tension between aspirations for positively seeking to meet development needs and positively seeking to protect the openness of the Green Belt in this district.

*14 At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking. For **plan-making** this means that:*

• local planning authorities should positively seek opportunities to meet the development needs of their area;

● *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

— *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

— *specific policies in this Framework indicate development should be restricted.*⁹

[9] *For example, those policies relating to ... land designated as Green Belt...*

In later sections of the NPPF this tension is laid out again, as the NPPF sets out very clearly that boosting significantly the supply of housing is a key aim, as also is the protection of the openness of the Green Belt. Some of the most relevant quotes include:

17 Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area

47 To boost significantly the supply of housing, local planning authorities should:

use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

89 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

In finding the right approach to finalizing the Local Housing Target, the NPPF as a whole has been considered. In conjunction, the Minister for Decentralization and Cities, Greg Clarke, made some pertinent points in his statement to the House of Commons on 27 March introducing the NPPF. He set out very clearly that the NPPF:

Makes it clear that relevant policies - such as those protecting the Green Belt, Sites of Special Scientific Interest, National Parks and other areas - cannot be overridden by the presumption;

SADC Consultation 2010-2011

For a substantial time prior to the publication of the final NPPF, SADC have sought to establish an appropriate balance between factors and objectives in determining the right level of sustainable development and the corresponding Housing Target. The Locally Derived Housing Target of 250 per annum was identified in 'Consultation on the Strategy for Locating Future Development in the District' and consulted upon in 2010-2011 as set out below:

"The Council has sought to find the most appropriate balance between all factors, especially providing 100 affordable homes per year whilst protecting the Green Belt. The fine balance between competing aims has led to a new local housing target of 250 homes per year.

Many complex factors must be considered in deciding the right amount, including the following:

- *The continuing pressure for more affordable housing*
- *The potential for housing development in existing settlements*
- *Population data, household growth data and the historic house building rate*
- *The need for new community facilities and transport improvements*
- *The Sustainability Appraisal process, which explores the social, environmental and economic impact of development*

The views of the local community; in particular the desire to retain the individual character of settlements, are another important factor."

Factors

Introduction

The purpose of this section is to set out the rationale behind the approach to the overall level of housing provision and the spatial distribution of growth in the St Albans SLP. The Council considers that the planned housing requirement is deliverable, justified and appropriate. It represents a coherent expression of the district's strategic and local priorities set in the context of social, economic and environmental objectives, in accordance with the principles of sustainable development.

The following key factors have therefore been taken into account in determining the most appropriate level of housing growth in the St Albans SLP:

- A. Our strategic objectives for the authority, as expressed in the Sustainable Community Strategy;
- B. The Sustainability Appraisal process;
- C. The authority's contribution to the overall vision for the East of England as a sub-region;

- D. The views of our communities determined through extensive public consultation;
- E. Local Economy;
- F. Infrastructure Deficit;
- G. Evidence of past completions;
- H. Detailed technical evidence about how much growth the area could accommodate;
- I. Technical assessment of population growth and housing need;
- J. Evaluations of the impacts of alternative future housing targets, tenures and sizes;
- K. Recent changes in national policy – the localism agenda.

A. Our strategic objectives for the district, as expressed in the Sustainable Community Strategy

The Planning and Compulsory Purchase Act 2004 requires that the local planning authority must have regard to any Sustainable Community Strategy for the area in preparing a local development document.

The St Albans SLP sets out a spatial vision and an approach to how future development should be managed. This relates closely to the higher level priorities set out in the Sustainable Community Strategy: Ensuring the District is a great place to be; Creating a diverse and sustainable economy for the 21st century; Keeping the District healthy; Supporting an active community that has pride in itself and cares for its future.

The SLP develops the 11 key issues that form the basis of responding to the challenges of delivering sustainable development in St Albans. These stem from the Sustainable Community Strategy priorities and this inter-relationship sets the context for the SLP. The level and distribution of future development planned accords with the objectives of this higher level plan.

B. The Sustainability Appraisal process

The Sustainability Appraisal/ Strategic Environmental Assessment process is an ongoing one and has informed all stages of SLP preparation. The process is complex, but in the context of this district there is overall support for lower rather than higher housing targets, assessed across the interrelated range of Economic, Environmental and Social roles.

This overall balance includes the full range of the three roles, including potential impacts upon: biodiversity; soil sealing; greenhouse gas emissions; air quality; resource efficiency; historic and cultural assets; equality and social exclusion; community identity & participation; landscape and townscape; fairer access to services; healthcare facilities and good quality housing.

For example, the Sustainability Appraisal Working Note accompanying the 2010 consultation document, compared between a higher (360) target and a lower (250) target as follows:

Environmental: *The lower levels of growth proposed would mean that there would be less pressure on greenfield sites in the Green Belt as much of the development would be provided in urban brownfield sites. This would have positive effects in terms of reducing impacts on biodiversity, protecting local landscapes, avoiding the reduction of gaps between settlements, and resulting in lower levels of soil loss. The lower growth would also mean that there will be less pressure on transport infrastructure which would help to avoid increases in greenhouse gas emissions as well as resulting in lower levels of any increase in air pollution from vehicles.*

As it would be possible to deliver this lower level of growth through fewer and smaller strategic sites, so some of the opportunities that existed at the higher growth level would be lost. These could have included green infrastructure improvements and the improvement of degraded landscapes in some edge of settlement areas.

Social: *The lower levels of growth would mean that there would be a larger shortfall in terms of meeting the identified overall housing needs of the District which would have societal implications and potential associated health and wellbeing issues. There could also be an out-migration of local people from the District to any neighbouring areas which do have available housing.*

As with the environmental topics there would also be a reduced potential for realising any major community infrastructure planning gains now that there are fewer and smaller strategic housing sites proposed. However to counter this, the lower levels of growth would place less strain on existing community infrastructure than if the higher levels had been taken forward.

Economic: *The new lower housing target would result in less additional support for shops and services in local and town centres which may already be under pressure in terms of viability. Given the already high levels of out-commuting from the District, and the limited new Strategic Employment allocations proposed, the lower level of growth would limit any increase in out-commuting.*

C. The authority's contribution to the overall vision for the East of England Plan (EEP)

The importance of the protection of the openness of the Green Belt has long been acknowledged as a significant factor in plan-making, including for the East of England Plan (EEP). The EEP recognised the protection of the Green Belt as a sufficient reason in the EEP for this district to plan for very substantially below traditional DCLG/ONS population/household projections. This can be seen

through the facts that both Strategic and Local Green Belt Reviews were set out in the EEP, which did not include land in this district.

In fact, a legal challenge removed reference to the possible review of the Green Belt boundary in this district. The final policy confirmed that the broad extent of the Green Belt in the region should be maintained and for this district proposed no Strategic or Local Green Belt Review.

POLICY SS7: Green Belt

SS7: Green Belt The broad extent of green belts in the East of England is appropriate, and should be maintained. However, strategic reviews of green belt boundaries are needed in the following areas to meet regional development needs at the most sustainable locations:

- Stevenage, involving land in Stevenage and North Hertfordshire;*
 - Harlow, involving land in Harlow, East Hertfordshire and Epping Forest Districts;*
- and*

A more local review will be required in Broxbourne.

It was an acknowledged fact in the EEP that the housing target for the district in the EEP (at least 360 per annum) would not fully account for DCLG/ONS population/household projections

5.3 ...provision is less than forecast household growth

5.5 ...the figure of 508,000 dwellings falls significantly short of what is needed based on evidence about housing pressure, affordability and household projections.

5.6 ...it will be sufficient to indicate broad areas for growth after 2021. Robust evidence will be needed to justify not doing so, for example green belt constraints in districts not proposed for green belt review.

In combination with the adopted timeframe of 2001 to 2021, it is clear that the overall approach to the appropriate level of a housing target in this district was set out as one which overwhelmingly prioritized the protection of the openness of the Green Belt above that of fully meeting perceived “need”.

D. The views of our communities determined through consultation

The NPPF sets out very clearly the importance of consultation with the community, engagement and reflecting a community vision for sustainable development, including at:

150 *Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities*

155 *...A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area*

The SLP has been developed as a result of extensive on-going engagement with our communities, partners and other stakeholders. The strategy has been developed following consultations on Issues and Options documents in 2006 and 2007, the Emerging Plan in 2009 and on the Strategy for Locating Future Development in the District in 2010/2011; as well as a more targeted workshops with key stakeholders, to establish the views of our communities on the key issues and objectives for the district.

Representations made during these public consultations from residents, businesses, organisations, elected representatives and other stakeholders have been key in shaping this document. From the representations made and the numerous letters and comments that have been sent to the Council there have been some key messages:

- There was particular strong opposition to options for potential urban extensions and areas of search in St Albans and Harpenden. Communities considered that the urban extensions would have unacceptable effects on the Green Belt, important views and landscape features and access to the countryside.
- It is clear that the Green Belt and open countryside is widely cherished by many people. Respondents prioritised objectives which seek to protect and manage the environment: 'protecting natural and historic assets' (97% agree overall; 79% strongly agree) and 'actively managing and improving the Green Belt (95%; 78%).

E The Local Economy

As set out by Herts LEP, Hertfordshire is the fifth largest economy outside London. It is home to over one million people and 47,000 businesses. Our economy is worth around £25bn – around 2% of the UK economy.

Compared to most areas of the UK, Hertfordshire is more prosperous and our residents have a better quality of life.

Hertfordshire contains all of the key components of a globally competitive location, namely:

- Significant employment in future growth sectors – Life sciences, Film & media, Advanced manufacturing/aerospace, Business services (financial & ICT)

- A highly qualified population – Higher than UK average for GCSE to degree level skills
- A well connected, strategic location – Major roads [M25, M1, A1(M)], strategic rail corridors, three international airports nearby
- A good quality of life – Excellent housing and schools, strong retail offer, green spaces

The LEP believe that the Hertfordshire economy can make a bigger contribution to UK plc. Focused effort is required to ensure we remain an attractive proposition for private sector investment. Herts LEP has produced a plan for growth titled 'Open for Business' which is seeking to build on our assets within Hertfordshire.

The City and District of St Albans is a key driver in Hertfordshire's economy. The District is a major hub for intellectual capital as nearly 50% of the residents have higher education qualifications. The District is also home to two global centres of excellence in the environmental sector – Rothamsted Research and the BRE – which require highly skilled high value employees. The district is also host to key businesses in the growth sector outlined above as Business services. These are primarily in the areas of financial services, consultancy and the legal profession.

In St Albans the unique and exceptional quality of the built and natural environment continues to be very important in supporting the prosperous local economy and providing a range of jobs for all. Key local employers and entrepreneurs agree that St Albans is a good place to locate business and to do business and the vital role that quality of life factors play in supporting the local intellectual capital economy. The district is economically thriving precisely because of these factors, an absolutely key element of which is the retention of the Green Belt. This includes all five of the core purposes Green Belt: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration.

E Infrastructure Deficit

In simple terms, the historic infrastructure deficit is the shortage of the infrastructure needed to support the existing residents and businesses.

This includes deficiencies where facilities or amenities are:

- Inadequate in size to serve the needs of the residents and businesses as evidenced by excess demand or in other cases such as open spaces where the scale of provision falls short of widely adopted planning benchmarks.
- Clearly functionally inadequate when measured against typical current standards or adopted policy.

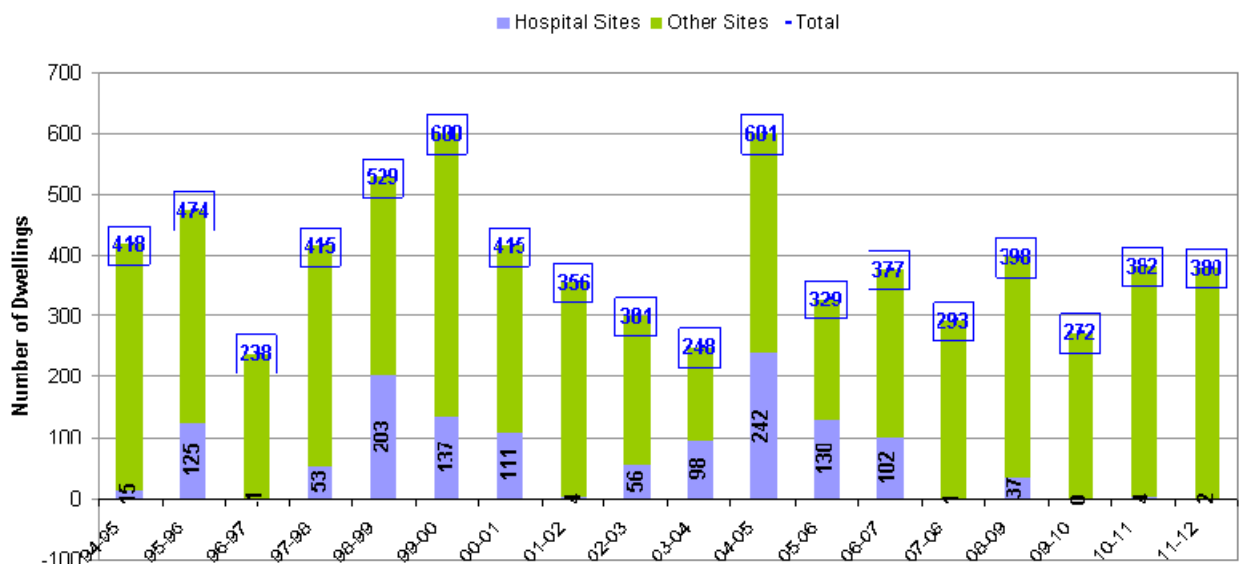
The Hertfordshire Infrastructure Investment Strategy identified that Hertfordshire has a measurable infrastructure deficit totaling over £2.4bn. This is the financial shortage against standards required for infrastructure and what is currently provided. The majority of this comes from highways and education infrastructure need.

New housing will exacerbate this existing infrastructure deficit, leading to further infrastructure related problems, such as congested roads and unfit school buildings.

F Evidence of past completions

In the early 1990s the Government and Regional Health Authority adopted policies putting a strong emphasis on local service provision known as 'community care'. This resulted in the gradual contraction of hospital facilities and the phased release of land at 3 hospitals in the district,. These were, Hill End, Cell Barnes and Napsbury hospitals, which comprised previously developed land in the Green Belt.

Past completions were boosted between 1995/6 – 2006/7 by redevelopment of these redundant hospital sites, which provided the district with significant development over approximately 12 years, in the region of 1,300 homes. However these hospital sites have now been built out. This historic circumstance will not be repeated and it is clear that the supply of future non-green field Green Belt sites will be affected compared to historic provision. The contributions from hospital sites are indicated on the graph below.



G Detailed technical evidence about how much growth the area could accommodate

Technical work to inform the Council's SLP includes the Environmental Capacity Study (2012) in support of the Council's position in relation to proposals for housing levels and distribution in the district. This can be found at <http://www.stalbans.gov.uk/environment-and-planning/planning/policy/ldfevidencebase.aspx>. St Albans Council considers that environmental and sustainability considerations should play a prominent role in the overall planning balance to establish the housing strategy. Consequently it has used environmental capacity study and other evidence such as sustainability appraisal work to inform and justify the pre submission publication SLP.

The Environmental Capacity Study started before the final NPPF, but was finalised immediately post the NPPF publication. It is believed that this district is the first in the UK to have commissioned such work, including utilising 'Ecosystems Services' information and approaches. This approach has now been supported by the NPPF (at paragraph 109). Key highlights include:

- The ecological footprint of the district reveals an unsustainable pattern of consumption of energy and resources. For example, an area of biologically productive land fifty times the size of the district is required to sustain its current population (approximately equivalent to Hertfordshire, Bedfordshire, Buckinghamshire and Essex combined).
- An area of land eleven times the size of the district is required to sustain the district's current food consumption and to produce sufficient domestic energy to support the local population would require an area of short-rotation coppice 1.7 times the area of the district.
- The district's non-urban areas will become even more important in terms of the district's ability to respond to energy and resource scarcity and climate change. Water resources are under immense pressure and over abstraction has resulted in biodiversity damage, including to local chalk streams.
- The retention and enhancement of the district's non-urban areas should be a key part of the local economic development strategy, due to its array of economic benefits.
- The Green Belt has worked successfully for more than 60 years in controlling the growth of Greater London. This has proven to be valuable for all Londoners in the sense that they all continue to live within a relatively short distance of the countryside. In St Albans City & District Green Belt has also served local people well, ensuring that the majority of residents live and work within close proximity to accessible and

attractive countryside. The Green Belt has also helped the district's settlements to maintain their own individual special character.

In view of these factors and trends, the observations made regarding the various global and local ecosystems and the services they provide and the fact that we are already exceeding the capacity of the environment to support us, the study concludes that it would be unwise to permit further urban development in the district on undeveloped land. Where development is permitted a Compact City approach is recommended. A Compact City approach involves mixed-use settlements within urban areas, which make effective use of public transport and encourage walking and cycling. .

H. Technical assessment of population growth and housing need

Are affordable housing requirements identified in the Strategic Housing Market Assessment (SHMA) likely to be achieved?

The affordable housing need identified in the London Commuter Belt West SHMA (June 2010) represents 94% of the EEP housing delivery target. This is clearly unachievable.

Figure 149
Tenure Mix of Housing Requirement 2007 to 2021 by LA based upon prices at long term trends (Note: Figures may not sum due to rounding)

Housing Tenure	Local Authority					
	Dacorum	Hertsmere	St Albans	Three Rivers	Watford	Welwyn Hatfield
Market housing	4,800	400	400	(400)	800	3,400
Intermediate affordable housing	-	2,700	5,300	2,300	2,100	500
Social rented housing	3,100	500	1,300	700	600	2,800
Total Housing Requirement	7,800	3,600	7,000	2,700	3,600	6,600
Market housing	60.7%	11.3%	6.2%	-	23.9%	50.8%
Intermediate affordable housing	-	75.9%	75.8%	77.1%	60.4%	6.9%
Social rented housing	39.3%	12.8%	18.1%	22.9%	15.7%	42.4%

Figure 153
Summary of the Housing Requirement to 2021 by Local Authority, HMA and Sub-region based upon prices at long term price trends..

	Affordable Housing			Market Housing	All Housing	
	Social Rent	Intermediate	Total		Smaller	Larger
Local Authority						
Dacorum	39%	-	39%	61%	44%	56%
Hertsmere	13%	76%	89%	11%	52%	48%
St Albans	18%	76%	94%	6%	50%	50%
Three Rivers	23%	77%	100%	-	65%	35%
Watford	16%	60%	76%	24%	44%	56%
Welwyn Hatfield	42%	7%	49%	51%	38%	62%
Sub-Market						
Hemel Hempstead	36%	-	36%	64%	-	-
St Albans	23%	73%	96%	4%	-	-
Watford	22%	52%	74%	26%	-	-
Welwyn Garden City and Hatfield	32%	15%	47%	53%	-	-
Overall Sub-region	27%	38%	65%	35%	48%	52%

The often very high total need figures indicated by SHMAs are not, on their own, a sufficient base for determining levels of affordable housing requirements/targets. Viability and practical barriers to delivery indicate that a pragmatic approach which aims to maximise delivery of affordable housing provides the best basis for strategic policy.

In this context, a total of 4,250 homes might theoretically support the delivery of 1,700 affordable homes however this will be dependant on the viability of individual schemes. If an average rate of 100 new affordable homes could be achieved this would compare well with the long term average of 72 affordable housing completions (2010 Housing Monitoring Report) and will result in an improvement in the provision of affordable housing in the district. In addition there is an intended significant increase in delivery of affordable homes on Council owned land.

Is housing growth sufficient to meet trend population growth requirements?

As set out on page 2, the Government's latest household projections for St Albans City and District - the Department for Communities and Local Government (DCLG) 2008-based sub-national household projections, suggest that there will be a requirement for 11,700 new households in the district over the plan period (to 2028). This equates to 688 households per annum, significantly higher than the adopted Regional Spatial Strategy housing requirement for St Albans City and District to deliver 360 households per annum.

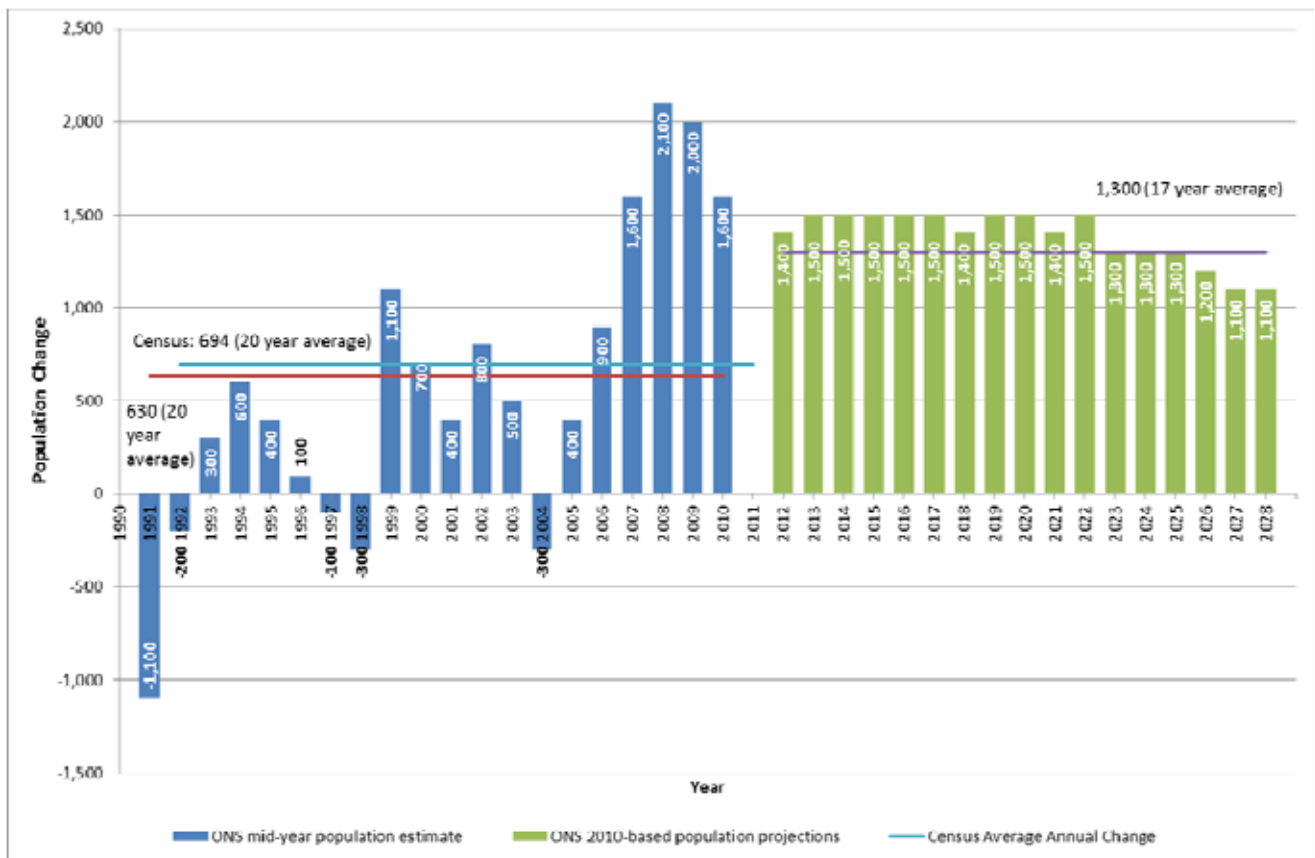
A major component of the 2008 sub-national household projections is the Office for National Statistics (ONS) sub-national population projections. The latest version of this is the 2010-based projections, were published in March 2012. It is important to note that these are straight line projections based solely

on recent population trends (2006-2010) in the levels of births, deaths and migration.

Based on documented evidence of longer term historic population trends and the recently published Census for 2011, the ONS 2010-based population projections for St Albans City and District can be considered likely to over inflate the projected level of population growth over the plan period. In the 17 year period 2012 – 2028, the population of St Albans City and District is projected to increase by 20,900 (an average of 1,229 persons per annum). In contrast ‘actual’ growth in the preceding 20 year period 1991 – 2011 was much lower at 13,884 (an average of 694 persons per annum).

Comparison between ONS historic estimates and projections set out in the table below illustrates that over the last two decades St Albans has undergone a net population increase in 15 out of 20 years. However there has been considerable fluctuation in growth with some years experiencing significantly higher population increases than others. The population declined in 5 out of 20 years.

Table 1: Annual population change estimated and projected (1991- 2028)



Furthermore, developing at the simple recent years trend rate illustrated by the DCLG projections ignores the essential influence of local policy objectives in planning for change, becoming a simplistic exercise in 'predict and provide'. The projections are also sensitive to changes in average household size. Historically the number of persons per dwelling has been decreasing but the most recent data indicates that this has recently leveled out and is now increasing (see table below). This will reduce the housing requirement. For example 694 people at the average rate in the table below of 2.7 persons per dwelling requires 257 homes per year; however at 2.2 persons per dwelling this requires 315 homes.

Census	Population	Households	Persons/Household
1971	120,296	38,460	3.13
1981	124,308	42,927	2.9
1991	126,716	48,319	2.6
2001	129,005	52,659	2.45
2011	140,600	56,100	2.5

The high rate of projected growth in the DCLG/ ONS projections, assumes continuation of high levels of in-migration (particularly from other parts of the Hertfordshire and London, but also from overseas) that have been seen in the recent past. It does not take into account any policy choices, policy changes, housing development or other factors which will influence future population levels.

I. Evaluations of the impacts of alternative future housing targets, tenures and sizes

Technical work to inform the Council's SLP includes work on future housing targets, tenures and sizes. In the context of the particular circumstances of the district as a whole, this work in part analyses a range of potential housing scenario targets. It supports the previously consulted upon 250 target, as opposed to other options. This balanced approach can be summed up as:

Scenario 1 [650] would involve serious damage to the Green Belt and other planning aims and it cannot be seen as a practical outcome for St Albans.

Scenario 2 [360] is clearly much less damaging than Scenario 1. However it would result in a considerable (10%) increase in out-commuting and general pressure on the road and other infrastructure.

Scenario 3 [250] adds somewhat to the net out commuting, but not very much. It provides a potentially viable 54:46 mix of market to affordable housing.

Scenario 4 [100] is clearly impractical as it is mostly affordable housing.

I. Recent changes in national policy – the localism agenda

Following the general election in May 2010, the Secretary of State announced the government's intention to abolish Regional Spatial Strategies. The primary legislation (the Localism Bill) has been enacted, and the government has clearly stated its intention to dismantle the regional planning system. The government has indicated that it is now for local authorities to set and justify their own housing numbers and distribution, as also set out in the NPPF.

The Minister for Decentralization and Cities, Greg Clarke, made some pertinent points in his statement to the House of Commons on 27 March introducing the NPPF. He set out very clearly that the final NPPF:

...put unprecedented power in the hands of communities to shape the places in which they live;

...

...Is crystal clear that sustainable development embraces social and environmental as well as economic objectives and does so in a balanced way;

...

Makes explicit that the presumption in favour of sustainable development works through, not against, local plans;

The Government's localism agenda has increased the emphasis on bottom-up plans that express the visions of local communities and the importance of achieving a better consensus in determining the balance between the impact of development and economic, environmental and social issues when setting housing targets.

The district's communities and the NPPF greatly value the fundamental aim of the retention and openness of the Green Belt. This openness plays many important roles; including preserving the setting, special character and historic nature of the district's settlements as well as providing accessible high quality open areas for London. This overriding value of openness is clearly recognised by the NPPF as development in Green Belt is specifically excluded from the presumption in favour of sustainable development.

Clear Rationale for SLP Housing Requirement

As set out above, at the heart of the SLP is the spatial vision. The vision for 2028 is distinctive to the district and includes ambitions which are challenging yet realistic for protecting the natural environment, improving people's quality of life,

maintaining a prosperous economy and providing a strategic direction for the creation of mixed and balanced communities over the next 15 years and beyond. The vision has taken account of the visions of the Sustainable Community Strategy, as well as the concerns, issues and priorities which have come through our engagement work.

The SLP strategy for development sets out the amount and locations of growth which will achieve this vision. It has been developed through a sound process which has involved continuing consultation with communities and other partners and gathering supporting technical evidence. The strategy has been subject to sustainability appraisal to ensure that the most sustainable choices have been made.

Costs And Benefits Of Higher And Lower Housing Targets

The approach set out below acknowledges and balances the benefits and costs of relatively higher or lower housing targets. In relation to higher theoretical housing targets, relative benefits could briefly include:

Costs	Benefits
Relatively Higher Housing Targets	
More development on green field Green Belt land and subsequent permanent loss of openness	More homes for existing residents, workers and incomers
Urban sprawl and possibly coalescence of settlements	More affordable homes provided
Greater impact on existing infrastructure, including transport, healthcare and education	More New Homes Bonus
Potentially worsen quality of life and therefore affect local intellectual capital economy	More Community Infrastructure Levy receipts
Misalignment against majority of local public opinion	Possibly more economic growth
Worsen in-commuting/out-commuting number balance	Possibly higher local retail expenditure growth
Loss of biodiversity and natural environment	
Higher increase in greenhouse gas emissions	
Worsen reliance on external food and energy resources	
Relatively Lower Housing Targets	

Fewer homes for existing residents, workers and incomers	Minimal development of green field Green Belt land preserving its openness for future generations
Fewer affordable homes provided	Protection against urban sprawl and enabling individual settlements to retain their own unique character and identity
Less New Homes Bonus	Lesser impact on existing infrastructure, including transport, healthcare and education
Less Community Infrastructure Levy Receipts	Supporting the local intellectual capital economy, linked to quality of life factors
Possibly less economic growth	Localism in action – a clear alignment with locally expressed objectives
Possibly lower local retail expenditure growth	Improved in-commuting/out-commuting number balance
	Preserving the built and natural environment for current and future generations
	Lower increase in greenhouse gas emissions
	More land available for local food and energy production

Approach To Calculating A Sustainable Level Of Housing Provision

It is considered that the most appropriate way to determine the starting point for calculating the sustainable level of housing provision for the plan period is the level of housing need; balanced against the space for appropriate and truly sustainable development.

As supported by the NPPF overall, especially at Para 14 and in Greg Clarke’s speech introducing the NPPF to Parliament, the Sustainability Appraisal, the community and the factors briefly outlined above, the twin thrusts of the general distribution of development within this development strategy are;

- Maintaining the fundamental aim of the Green Belt in keeping land permanently open, by not developing on green field Green Belt land.
- Prioritising opportunities to maximise the economic, environmental and social benefits of sustainable development.

The development strategy for the district is based on a compact city approach through meeting future requirements by developing within existing settlements, particularly the City and towns, rather than extending into the Green Belt. This approach depends on using available sites within urban areas to their full

potential, consistent with high quality design and balancing economic, social and environmental factors. Using land efficiently means that for each site , development is optimised and less land in total is needed as a consequence to meet the district's development requirements, with beneficial effects for protection of the countryside.

It is clear that housing should not be considered in isolation. It should take into account of other land uses needed to achieve sustainable communities, such as employment, retail, transport & community uses. The SLP is therefore considering sustainable development in the round. It ensures that the approach to maximizing opportunities for residential development on urban land or previously developed land in the Green Belt does not compromise the spatial strategy as a whole, including alternative desirable land uses in these areas. For example, the retention of appropriate existing employment sites to provide local jobs and opportunities for businesses to deliver growth is also of great importance and has been appropriately considered. Another example is the BRE Broad Location. Here the SLP has a proposed policy taking a holistic approach to the redevelopment of some redundant PDL for residential use, to support and retain a key employer in a key sector and provide significant community benefits.

Whilst the overall approach is set out above, there are some specific exceptions where building on green field Green Belt land is considered appropriate as part of the comprehensive spatial approach. These exceptions have been made in order to deliver truly exceptional levels of community benefits and at the same time to go some way to meeting the higher range of housing needs figures and gaining overall benefits from more housing developments.

They are of two main types.

1. Large Community Infrastructure sites comprising large scale previously developed land in the Green Belt with unique community facilities. The SLP sets out some Green Belt green field housing development to support delivery of new and improved community facilities at:

Oaklands College
Harperbury Hospital/Kingsley Green

2. Some limited small scale Green Belt green field residential developments where directly supported by local communities to deliver significant community benefits; delivered through the DLP. Also, where there is an established local need, some land adjoining or within villages may be developed to provide affordable housing where it is supported by the local community. Such small-scale 'rural exception' sites will help address the needs of lower-income households with a close family or employment

connection to that settlement. These sites will be identified through the Neighbourhood Planning process.

Local Housing Target/Requirement

Taking the approach set out above, the most up to date and historical information has been analysed to give confidence of delivery in the following categories. The table below indicates sources & approximate proportion of supply from different land types for housing development.

Urban/Non-Green Belt Capacity	45 – 50%
Green Belt PDL	5 – 10%
Broad Locations to be contained in the SLP Including Oaklands, Harperbury and BRE	15 – 20%
Windfall	20 – 30%
Small scale Green Belt greenfield supported by local communities through DLP or Neighbourhood Plan process	5%

Taking account of all relevant aspects, including market factors and allowing for flexibility and contingency, the approach supports:

Local Housing Target/Requirement = 250 dwellings per annum

This target/requirement is an average figure and amounts to 4,250 dwellings across the plan period.