

APPENDIX 7



Planning and Building Control

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By Email

Dear James and Mark

Thank you for your letter dated 8 January 2016 confirming we are in agreement that:

... it is in all our interests for every local authority within SW Hertfordshire to have up-to-date development plans in place and we are keen to help ensure this is the case for St Albans.

We were pleased to have been able to support and work with you in all four of your Core Strategy processes leading towards their successful adoption, particularly Dacorum. Taking a step back it might be useful to set out below a short and simplified timeline of Strategic Housing Market Assessment (SHMA) work relating to St Albans District and related Local Plan progress.

2010 - London Arc Commuter Belt West SHMA (ORS) – Concluded that St Albans was a single Housing Market Area; or alternatively St Albans with Dacorum and Welwyn Hatfield. It analysed, but did not support, a 5 LPA SW Herts Housing Market Area.

2011-2013 – Dacorum, Hertsmere, Three Rivers, Watford Core Strategies adopted – no different Housing Market Areas published or suggested at Hertfordshire Infrastructure and Planning Partnership (HIPP) or Hertfordshire Planning Group (HPG).

2013 - St Albans commissions independent SHMA – Housing Vision publish a Housing Market Area with a Core matching St Albans LPA (agreeing with ORS 2010 view). The report recognises a wider geography involving all moves in and out of the district; it identifies a 'Wider Housing Market Area' consisting of: Central Beds, Dacorum, East Herts, Hertsmere, Luton, North Herts, Stevenage, Three Rivers, Watford and Welwyn & Hatfield.

2014 – St Albans consults on Regulation 18 Strategic Local Plan (SLP). No evidence was put forward to dispute the St Albans HMA. Economic Development work with Hertfordshire Local Enterprise Partnership (LEP) to support LEP SEP.

2015 – St Albans has DtC meetings with 10 LPAs, including all 4 SW Herts. St Albans 2013 SHMA evidence discussed with all 4 SW Herts LPAs.

2015 - Housing Vision update SHMA for St Albans and reconfirm St Albans is an appropriate Housing Market Area.

2015 - SW Herts SHMA work starts.



Dec 2015 – St Albans Council approves SLP for Regulation 19 publication – consultation commences 8 Jan 2016

Feb 2016 – SW Herts due to publish SHMA.

In order to assist you and to aid your response to our current Regulation 19 consultation, I focus my response to the 5 questions you raise at this time. There are other questions that arise from your letter and some further technical points which we will cover with you during our on-going duty to co-operate discussions.

We would therefore request reassurance from your authority, as a matter of urgency and in advance of the close of consultation on your Pre-Submission Strategic Local Plan, that you are satisfied you have:

1. met the requirements of the NPPF and PPG regarding the methodological approach to the identification of St. Albans' objectively assessed need (OAN) for housing, including consultation with neighbouring authorities;

Our housing work for the SLP is based on an "Independent Assessment of Housing Needs and Strategic Housing Market Assessment" (SHMA), initially published in 2013 and recently updated (SHMA Update 2015). The Council and the independent consultancy (Housing Vision) are satisfied that these meet the requirements of the NPPF and address the related PPG content.

St Albans is satisfied that the requirements have been met.

2. developed an appropriate and up-to-date employment evidence base and are satisfied that this is robust in the context of the conclusions of the SW Herts Economy Study;

Our economic development and employment work for the SLP is based on the joint studies undertaken with groupings of Hertfordshire authorities in 2006 (Broxbourne, Dacorum, Hertsmere, St. Albans, Three Rivers, Watford and Welwyn Hatfield Councils) and 2009 (Hertsmere, St Albans and Welwyn Hatfield Councils) and work undertaken in conjunction with the LEP in 2014-15.

The economic development policies as set out in the SLP; including those relating to Rothamsted, the Building Research Establishment (BRE), the 55 hectares of employment land at East Hemel Hempstead and the Strategic Rail Freight Interchange (SRFI) deliver against the 2006, 2009 and 2014-15 conclusions as well as the draft SW Herts Economy Study.

St Albans is satisfied that there is an appropriate and robust evidence base for economic development and employment issues.

However, an outcome of the duty to co-operate meetings with our neighbours is that this evidence is currently being updated. Initial outcomes were reported to our

Planning Policy Committee (PPC) in January 2016. The full comprehensive study will be reported to the March 2016 PPC meeting.

3. taken appropriate account of the HMA and FEMA which have emerged from the joint studies of the South West Herts Authorities' consultants when finalising your Pre-Submission plan;

St Albans is satisfied that appropriate account has been taken of the emerging HMA and FEMA in the consultants' draft work for the four SW Herts authorities. When the reports are published, we are happy to assure you that we will take further account of them, as far as is considered relevant, in due course.

4. taken all appropriate steps to maximise housing and employment growth within your area, or sought provision for any unmet needs to be met elsewhere; and

The SLP sets out the release of land to support the delivery of 4,000 homes and 55 Hectares of employment land in the Green Belt. It also acknowledges a planning permission for a 3.5 million sq ft SRFI in the Green Belt. As it may assist, I quote from the SLP at 6.37 in full:

"The Council's Local Housing Requirement / Target is set at 436 dwellings per annum on the basis of the best evidence available on the need for new housing development in the District and a Plan that sets out to meet reasonable long term estimations of need in full. Housing needs research suggests that, using a demographic projection of future household growth and taking account of longer term estimates of migration (ten year projection period), an annual average provision of 436 new dwellings would meet full need. The locations and type of development to deliver this 436 per annum housing requirement / target, but no more, meets the test of 'exceptional circumstances' and the required balance of economic, environmental and social considerations in a District wholly bounded by the Green Belt. This estimate of need has been used to directly inform a Plan housing requirement/target. It is acknowledged that other calculations of need currently exist and new calculations of need will be made over time. Unless there is a highly significant change in future long-term estimations of need, the 436 target/requirement is considered not to be affected by current or future alternative projections. Any such change would be dealt with through a review of the Local Plan."

As you will be aware from duty to co-operate discussions in early 2015 in association with the SLP Regulation 18 consultation, all adjoining and nearby Local Planning Authorities (LPAs) were explicitly asked if they could meet St Albans' housing needs. No LPA considered that they could.

St Albans is satisfied that it has followed the requirements of the NPPF in regard to housing and employment growth.

5. published sufficient demographic and other evidence to justify the identification of land to the east of Hemel Hempstead as meeting solely St. Albans' own housing and employment needs, and have made maximum use of the land available.

The work used in our full, objective assessment of our local areas housing need is referred to earlier in this letter.

It is perhaps also useful to clarify what the SLP sets out, with regard to the Broad Locations at East Hemel Hempstead. The SLP states at 6.69 "...This would provide employment opportunities for St Albans City and District and Dacorum Borough residents and wider benefits for economic development in the sub-region".

St Albans is satisfied that the approach taken to land at East Hemel Hempstead is justified by demographic and other evidence.

I trust that the answers above will assist you in responding positively to our current Regulation 19 consultation.

I would emphasise that there are considerable areas of agreement between the four SW Herts LPAs and St Albans. This includes the importance of testing ONS/DCLG projections and providing more nuanced and localised approaches; even if we differ on what exactly that those approaches might be. We also agree on the importance of getting Local Plans in place and the need to undertake Green Belt Reviews at the appropriate time.

I confirm that St Albans continues to be fully committed to ongoing work and discussion about cross-boundary issues as part of the duty to co-operate. The very close of alignment of the SLP to the desired outcomes of the LEP SEP and Herts Enterprise Zone and support for/with Dacorum in delivery for Maylands and East Hemel Hempstead is an example of this.

We are happy to discuss these or any other issues as part of our on-going duty to co-operate meetings.

Yours sincerely



Tracy Harvey
Head of Planning & Building Control
St Albans City and District Council