

Matter 4 – Type and Mix of Housing

Issue 1 – Housing Mix and Density

Q1 Is Policy HOU1 justified by appropriate, available evidence?

- 1.1 Yes, it is considered that Policy HOU1 is justified by appropriate, available evidence. This is primarily set out in HOU 02.01 - South West Herts Local Housing Needs Assessment Report (2024).
- 1.2 Following Regulation 18 consultation, the Council reviewed the housing mix policy in the draft Plan on the basis of consultation responses received and the final version of the LHNA. As a result of this further information regarding housing mix, suggested updates were made to the Draft Policy HOU1 Housing Mix. These updates were taken to Planning Policy & Climate Committee in December 2023 as follows:

...recommend drop the 4-bed requirement for affordable home ownership..

and

...Four bed rented homes are difficult to deliver, strongly advise a target percentage of no more than 5%....

- 1.3 The draft Local Plan Regulation 18 response from Hightown Housing Association (Ref 918) was particularly helpful in updating the policy. Hightown Housing Association has extensive involvement with and experience of delivering affordable housing within the District.
- 1.4 The starting point for the Regulation 19 Policy HOU1 Housing Mix is set out in Table 8.27 'SW Herts - Recommend Mix' on page 162 of the LHNA 2024.

Table 8.27 SW Herts - Recommend Mix

	Market	Affordable home ownership	Affordable housing (rented)	
			General needs	Older persons
1-bedroom	5%	20%	20%	50%
2-bedrooms	20%	40%	30%	50%
3-bedrooms	45%	30%	35%	
4+-bedrooms	30%	10%	15%	

- 1.5 In response to the Regulation 18 representation from Hightown Housing Association (Ref 918), the housing mix was revised to reduce the proportion of 4-bedroom homes in both affordable home ownership and affordable rent tenures because this size of housing is difficult to deliver. This reduction was balanced by an increase in the provision of 2- and 3-bedroom homes. This approach was also supported by SADC Housing colleagues.
- 1.6 The market housing mix aligns with the 2024 LHNA 'SW Herts – Recommended Mix' and was not amended.

- 1.7 Policy HOU1 (Housing Mix) was endorsed by the PP&C Committee in September 2024.
- 1.8 St Albans Local Plan Sustainability Appraisal Report (2024) (LPCD 03.01) sets out the following regarding Policy HOU1 Housing Mix:
- *Policy HOU1 (Housing Mix) – specifies the housing mix required at sites involving more than 10 homes, with a breakdown by both size and tenure, including a distinction between affordable home ownership and affordable rent tenures. This represents a considerable step-change in respect of response to the housing crisis, with wide ranging benefits such as for health and wellbeing, communities and the local economy (and, in turn, reducing out-commuting). With the Local Plan in place it will be possible to require higher density developments comprising smaller homes than would otherwise be delivered by the market, suited to first time buyers, young families and downsizers. Also, there will be a step-change in affordable housing delivery, with several hundred delivered every year (with a tenure mix in line with policy) as opposed to fewer than 100, which is the typical rate of delivery...*
- 1.9 Policy HOU1 Housing Mix is therefore considered justified by appropriate, available evidence.

Q2 Is the Plan sufficiently flexible enough to adapt to changing circumstances and needs over the plan period?

- 2.1 Yes, the Plan is considered to be sufficiently flexible enough to adapt to changing circumstances and needs over the plan period.
- 2.2 The evidence as set out primarily in the South West Herts Local Housing Needs Assessment Report (2024) (HOU 02.01) is broadly consistent with the earlier South West Herts SHMA (2016) (HOU 03.01). With regard to the housing mix, the LHNA 2024 includes in particular table 8.27, as set out below:

Table 8.27 SW Herts - Recommend Mix

	Market	Affordable home ownership	Affordable housing (rented)	
			General needs	Older persons
1-bedroom	5%	20%	20%	50%
2-bedrooms	20%	40%	30%	
3-bedrooms	45%	30%	35%	
4+-bedrooms	30%	10%	15%	

- 2.3 The recommended housing mix in the SHMA 2016 is set out in table 77 below:

Table 77: Recommended Housing Mix – HMA

	1-bed	2-bed	3-bed	4+ bed
Market	5-10%	25-30%	40-45%	20-25%
Affordable	30-35%	30-35%	25-30%	5-10%
All dwellings	15%	30%	40%	15%

2.4 The overall pattern shows broad consistency between the 2016 and 2024 data, which provides confidence that the needs identified in HOU1 are likely to remain broadly stable over time.

2.5 With regard to flexibility, Policy HOU1 sets out the following:

The delivery of specialist housing at Broad Locations could affect the housing mix by increasing the number of smaller units. Therefore the housing mix may be adjusted on sites that deliver specialist housing units to take account of an increased proportion of smaller units.

2.6 A proposed Main Modification (as set out in SADC/ED85A and SADC/ED85C) would add the text as follows to Policy HOU1. It reflects the existing text at paragraph 4.6 and enhances the flexible policy approach.

Urban brownfield sites with good access to local services (including public transport) by active travel modes, may require a different mix of more flatted homes and fewer three and four bedroom homes, reflecting the site characteristics, context and viability.

2.7 In addition, the Plan already sets out flexibility of approach at paragraph 4.6 in relation to site-specific factors in urban areas:

There will be a limited number of urban brownfield sites which may require a different mix of more flatted homes and fewer three and four bedroom homes that reflects the site characteristics, context and viability.

2.8 It can also be note that the Council has already committed to an early review of the Plan. Main Modifications propose that the following text is added to Policy SP1 A Spatial Strategy for St Albans District:

The Council will undertake a review of the Local Plan, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for Examination no later than three years after the date of adoption of the plan.

2.9 It is therefore considered that the Plan is sufficiently flexible enough to adapt to changing circumstances and needs over the plan period.

Q3 How is it intended that Policy HOU1 interacts with criterion b) of Policy HOU2 in terms of dwelling size?

- 3.1 Policy HOU1 is intended to serve as the primary basis for determining the housing mix for affordable homes. However, criterion b) of Policy HOU2 adds important local context by highlighting the particular desirability of providing three-bedroom affordable homes. This reflects the priority needs identified in the Council's Housing Register and the requirements of households in temporary accommodation, and is therefore a relevant consideration for applicable planning applications.
- 3.2 The use of the word 'encouraging' in Policy HOU2 criterion b) has proven to be a valuable element for the Council, particularly in the context of its own affordable housing schemes — both those delivered in recent years and those currently in the pipeline. It has also served as a meaningful signal to Registered Providers and other applicants when shaping the schemes they bring forward.
- 3.3 It is considered that there is an appropriate interaction between Policy HOU1 with criterion b) of Policy HOU2 in terms of dwelling size.

Q4 Is Policy DES3 consistent with paragraphs 128 and 146 of the Framework insofar as making an efficient use of land is concerned?

- 4.1 Yes, Policy DES3 is considered to be consistent with paragraphs 128 and 146 of the Framework insofar as making an efficient use of land is concerned.
- 4.2 Paragraphs 128 and 146 of the Framework read as follows:

128. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed and beautiful, attractive and healthy places.*

...

146. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

4.3 Policy DES3 reads as follows:

DES3 – Efficient Use of Land

Development proposals should make efficient use of land. Development should:

- a) Where additional residential units are proposed, achieve at least the density of the existing site context or 40 net dwellings per hectare, whichever is higher; and*
- b) Optimise site capacity within city and town centres and other locations that are well served by public transport. This requires development to be of the most appropriate form and land use for the site, having regard to site context and constraints.*

Development proposals that do not make efficient use of land will be refused.

- 4.4 The requirement in DES3 a) to achieve ‘*at least the density of the existing site context or 40 net dwellings per hectare, whichever is higher*’ supports development that makes efficient use of land in every site context; and ensures that the general ‘standard’ minimum density of 40 net dph is not the applicable measure in areas of existing higher density; thereby ensuring no reduction in density. This is considered to be consistent with paragraphs 128 and 146 of the Framework insofar as making an efficient use of land is concerned.
- 4.5 In relation to using 40 net dph as the ‘standard’ minimum density, and as set out in reasoned justification paragraph 12.15: ‘*In accordance with previous Council density studies, current best practice and the need to make efficient use of land; it is considered that 40 net dph is a minimum density that can generally be readily achieved throughout the District.*’
- 4.6 Furthermore, as set out in the Housing Land Supply, Windfall and Housing Capacity Evidence Paper 2024 (HOU 01.02):
 - 7.4 *For the Green Belt sites, justification for the assumption of 40 dwellings per hectare (dph) density is set out in the HELAA report (paragraph 3.30), with reference to the Council’s previous Residential Density Report 2014. The 40dph is consistent and does not change to account for different density of adjacent development, in order to ensure efficient use of land and to minimise the amount of Green Belt land that is released. This is in line with the approach in the NPPF 2023 which sets out that, where there is an existing or anticipated shortage of land for meeting identified housing needs, it is*

especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

- 4.7 The Housing and Economic Land Availability Assessment (HELAA) Report 2021 (HELAA 01.01) referred to above further sets out:

Housing sites will use the 40 dwellings per hectare (dph), in accordance with the Councils previous Residential Density Report 2014¹. It is considered that 40dph is a relatively 'safe', robust assumption which can be readily achieved in suburban location housing developments in the District

- 4.8 The 'Councils previous Residential Density Report 2014' referred to above is HOU 08.02, which states that: *"The purpose of this Note is to illustrate housing density on some well known sites across St Albans City and District and thus to give a range of comparators for typical residential layouts / designs"*; and includes net density calculations for a total of 20 relatively recent housing developments in the District. It finds a wide range of densities present, between 15 net dph and 117 net dph. Of those relatively recent developments which were assessed that were built on former Green Belt land, they were all below 40 net dph (roughly an average of 27 net dph), and as such the proposed 'general' minimum of 40 net dph can be seen to represent an uplift.

- 4.9 The Policy is consistent with criteria a)-e) of NPPF paragraph 128 primarily through the reference to the existing site context. It is acknowledged that in some parts of the District the general 'standard' minimum density of 40 net dph would lead to development of higher density than the site's context; and that in certain 'lower density' or potentially sensitive areas there could potentially be a perceived tension between higher density development and, for example, maintaining an area's prevailing character and setting (NPPF 128d). However, the policies in Chapter 11 - Historic Environment and Chapter 12 – High Quality Design would help ensure that development is acceptable in these regards.

- 4.10 Attention is also drawn to the approach taken for Part B allocation site M22 - Wood End, Hatching Green, Harpenden, AL5 2JT where it states in a Key development requirement:

4. The site lies partially within Harpenden Conservation Area. Development proposals should minimise any harm to the character and appearance of Harpenden Conservation Area and its setting, and minimise any harm to the setting of the Locally Listed Wood End. This may include buildings which are of a comparable scale to nearby detached dwellings but which contain within them multiple dwelling units, so as to ensure efficient use of land while remaining sympathetic to adjacent character.

- 4.11 It should be noted that this potential of including *'buildings which are of a comparable scale to nearby detached dwellings but which contain within them multiple dwelling units, so as to ensure efficient use of land while remaining sympathetic to adjacent*

character’ was recommended in a Heritage Impact Assessment for this site and another comparable site (which was not ultimately put forward, for access-related reasons) by heritage consultants Essex Place Services. It is considered that this approach at other ‘lower density’ or potentially sensitive areas could potentially be used, in order to similarly ensure efficient use of land while remaining sympathetic to adjacent character.

- 4.12 With regard to NPPF paragraph 146 it is considered that criteria b) is of most relevance here; where it sets out (in summary) that a strategy should minimise Green Belt release through optimising the density of development and through promoting a significant uplift in minimum density standards in town and city centres and other locations well served by public transport. It is considered that the DES3 b) requirement to *‘Optimise site capacity within city and town centres and other locations that are well served by public transport.’* and the explanation that *‘This requires development to be of the most appropriate form and land use for the site, having regard to site context and constraints.’* are consistent with the relevant parts of NPPF paragraph 146.
- 4.13 Taking the above into account, it is considered that Policy DES3 is consistent with paragraphs 128 and 146 of the Framework insofar as making an efficient use of land is concerned.