

St Albans City and District

Housing Delivery Test Action Plan

(December 2020)

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1 INTRODUCTION

1.1. Background

- 1.1.1 The Government has introduced a Housing Delivery Test (HDT) as the mechanism to monitor housing delivery locally. This measures net additional dwellings delivered against the homes the government requires each Local Planning Authority (LPA) in England to deliver. It is measured over a three year rolling period, starting in the financial year 2016/17. The Government issues results on performance for each LPA on an annual basis. The HDT has three requirements:
 - If delivery has been less than 95% of the housing target, the LPA should prepare an Action Plan to address the reasons for the shortfall.
 - If delivery has been less than 85% of the housing target, the LPA should also include a 20% buffer in calculating its 5 years housing land supply.
 - If delivery has been less than 75%, the presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF) is also engaged.
- 1.1.2 The latest Housing Delivery Test Results were published by the Secretary of State in February 2020. The Council delivered 63% of the government's target. In response to this, the council has produced this Housing Delivery Test Action Plan (Action Plan), responding positively to the challenge of increasing its housing delivery.
- 1.1.3 The delivery of new homes is a key national issue. In recent years, the Government has implemented numerous measures in an attempt to help stimulate and support home building, including ongoing reform of the planning system. Stimulating and supporting home building is particularly important in light of the economic crisis caused by the Covid-19 pandemic. The COVID-19 pandemic has had a negative impact on development activity temporarily and is likely to continue to create uncertainty for time to come.
- 1.1.4. This Action Plan has been prepared to show how the Council is responding to the challenge of ensuring that more homes are built in the district and faster. It has been prepared in accordance with the government's Planning Practice Guidance. It analyses the reasons for the under-delivery of new homes against the Government's new requirements. It sets out clear actions to improve housing delivery within the District. This is an update to the first Housing Delivery Test Action Plan published in 2019.

1.2 Purpose, Objectives and Status

1.2.1 In line with the government's Planning Practice Guidance, this paper:



- briefly reviews the housing market;
- identifies the reasons for under delivery;
- explores ways to reduce the risk of further under-delivery; and
- sets out measures the Council intends to take to improve levels of delivery.

1.3 Relationship to other plans/strategies and council activities

1.3.1 The Action Plan complements existing Council plans, policies and strategies which provide a framework for the delivery of the council's housing priorities. This includes the following:

• Plan making in the district

Work is beginning on a new Local Plan (2020-2038) for the district. In addition work is underway on a Joint Strategic Plan (JSP) for South West Herts for the time period 2036-2050. The council is working with its neighbours in Dacorum, Hertsmere, Three Rivers and Watford. This will provide the framework for future housing and economic development across the district including the release of the largest site allocations.

• <u>Corporate Plan (2019-2025¹)</u>

The Corporate Plan has clear priorities around increasing quantity and quality of social housing. These are:

- Setting up a development company
- Delivering housing on council own land
- Providing a sheltered housing redevelopment program

• Housing Strategy Update (2017)

Making the best use of housing land and assets to deliver new housing, by redeveloping of council owned garage sites and former sheltered schemes to provide new social housing. The Housing Strategy was last updated with an Action Plan in 2017².

The aims were to:

- Increase housing supply by making best use of housing land
- Provide assets to deliver new housing
- Support the delivery of new homes to meet identified needs.

1.4 Approach and methodology

1.4.1. The Action Plan has been informed by the council's Authority Monitoring Report (AMR), which reports the yearly housing delivery in the District.



¹

https://www.stalbans.gov.uk/sites/default/files/attachments/SADC%20Corporate%20Plan%202020%2 0web.pdf

² <u>https://www.stalbans.gov.uk/sites/default/files/documents/publications/housing/housing-</u>

publications/Housing%20Strategy%20Update%202017_tcm15-62769.pdf

2 LOCAL HOUSING MARKET

2.1 Property prices and affordability

- 2.1.1. The St Albans City and District area (the district) is an affluent district in the south east of England. It is within a Housing Market Area which includes its neighbours in the South West Hertfordshire area. It remains a popular place to live in including because of its good quality of life (ninth highest quality of life in the UK in 2016³ and best in the South East in 2020⁴). In addition it has fast rail links to London. Over 80% of the district is in the Metropolitan Green Belt.
- 2.1.2. Reflecting its popularity the median house price in Sep 2019 was £530,000, a reduction of £10,000 compared to Sep 2018. The lower quartile house price in Sep 2019 was £385,000, a reduction of £2,000 compared to Sep 2018⁵. There are some signs of uncertainty in the private sales market (possibly connected to Brexit). However, the market remains buoyant in other areas, particularly the private housing for rent market.
- 2.1.3. Figure 1 below continues to show that the district has markedly higher house prices compared to the rest of the county of Hertfordshire, the East of England and England.

Figure 1 - Comparison of annual median house price trends between end September 2017 and September 2019 (St Albans, Hertfordshire, East of England and England (price in £) (source: ONS House price to workplace-based earnings ratios)



³ <u>https://www.hertsad.co.uk/property/st-albans-named-as-one-of-the-uk-s-best-places-to-live-1-5867404</u> https://www.thetimes.co.uk/article/st-albans-hertfordshire-best-places-to-live-in-the-uk-2020-57p3n6bdg



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⁵

https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedear ningslowerquartileandmedian

- 2.1.4. The median house price to median earnings ratio in 2019 was 16.09 and the lower quartile house price to lower quartile earnings ratio was 16.92.
- 2.1.5. The median gross annual workplace-based earnings in 2019 was £32,948 and the lower quartile annual workplace-based earnings was £22,759.

2.2 Housing stock

2.2.1. The current housing stock in the district for 2019 is 61,047, an increase of 624 from 2018 (source: Table 125 published by MHCLG⁶).

⁶ https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants

3. HOUSING DELIVERY

- 3.0.1 At present, the adopted Local Plan for St Albans City and District is the District Local Plan Review (November 1994). Under the Planning and Compulsory Purchase Act 2004 the policies in the adopted Local Plan were automatically 'saved' for three years. Subsequently the Government agreed to some policies being saved for longer; effectively until they are replaced by a new Plan.
- 3.0.2 The council monitors housing delivery through its annual Authority Monitoring Report and uses a framework setting out core measures and indicators of progress on implementation of the Plan. In relation to housing, the core measures and indicators are shown in the following table.

3.1 Net additional dwellings completed

- 3.1.1. Since 1994/95 the District has delivered an average of around 393 net dwellings each year. There has been an increase of delivery in recent years from large office to residential developments that completed in between 2018-19 and 2019-20.
- 3.1.2. Table 1 shows the history delivery rate, including the delivery of affordable housing since the Plan was adopted.

Table 1 - Monitoring Report 2020: Affordable Housing Completions C3 Use Class (Net) Through District Local Plan Review 1994 Policies (1994/95 – 2019/20)

	Dw					
		Affo	Affordable Housing			
Monitoring Year	Annual Total	Policy 7A/8	Other Policy	Total	Percent Affordable (%)	
1994/95	418	26	70	96	23	
1995/96	474	125	45	170	36	
1996/97	238	8	49	57	24	
1997/98	415	35	-41	-6	-1	
1998/99	529	58	66	124	23	
1999/00	600	32	-7	25	4	
2000/01	415	4	26	30	7	
2001/02	356	44	20	64	18	
2002/03	301	26	19	45	15	
2003/04	248	0	7	7	3	
2004/05	601	206	37	243	40	
2005/06	329	18	10	28	9	
2006/07	377	0	10	10	3	
2007/08	293	17	19	36	12	



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2008/09	398	85	7	92	23
2009/10	272	119	10	129	47
2010/11	382	102	13	115	30
2011/12	380	12	8	20	5
2012/13	320	75	30	105	33
2013/14	375	27	-69	-42	-11
2014/15	313	8	62	70	22
2015/16	396	83	14	97	24
2016/17	340	38	21	59	17
2017/18	385	95	11	106	28
2018/19	624	71	11	82	13
2019/20	437	24	7	31	7
Total	10,216	1,338	455	1,793	18
Average Dwellings per Annum (1994/95 to 2019/20)	393	51	18	69	18

- 3.1.2. During the monitoring years 2018/19 and 2019/20 a total of 624 and 437 net C3 dwellings were completed respectively. Most of the development in this period was delivered in St Albans. This figure is lower than the MHCLG figure of 893⁷ (latest figure for 2020) calculated using the standard methodology. The latest Housing Trajectory shows a five year land supply of 2.4 years (including the 20% 'buffer' as required by the NPPF)⁸. The council cannot currently demonstrate a five year housing supply target.
- 3.1.3. In March 2019, the council submitted a Local Plan to the Planning Inspectorate that sought to boost significantly housing supply. It would have delivered 14,608 additional homes over the period to 2036 including the release of a number of "broad locations" in the Metropolitan Green Belt. It would have delivered an average of 913 homes per annum. The appointed Planning Inspectors did not support the Plan and it was withdrawn on 23 November 2020. A new draft Local Development Scheme (LDS) was considered at Planning Policy Committee on 8 December 2020 for a new draft Local Plan⁹. Separate from this the council is still also progressing the SWH JSP for the period 2036-2050¹⁰.

⁷ <u>https://www.stalbans.gov.uk/sites/default/files/attachments/HOU%20September%202020%20-%20South%20West%20Hertfordshire%20Local%20Housing%20Need%20Assessment.pdf</u>



⁸ https://stalbans.moderngov.co.uk/documents/s50048192/PPC%20Dec%202020%20-

^{%20}Updated%20Draft%20Housing%20Trajectory%20Information%20Paper.pdf 9 https://stalbans.moderngov.co.uk/documents/s50048206/Appendix%202%20-

²⁰Draft%20Local%20Development%20Scheme%20200-2023.pdf

¹⁰ <u>https://www.stalbans.gov.uk/south-west-herts-joint-strategic-plan</u>

3.2 Council housing completions

3.2.1. The Council has successfully delivered new homes in 2019/20 by redeveloping Council owned sites¹¹. Further sites are in the pipeline for delivery (see paragraph 5.3). Wavell House, in Cell Barnes Lane, was demolished and 24 new homes for over-55s were built on the site. Linley Court, in Valley Road was converted into 28 properties at social rent. Betty Entwistle House, in Holyrood Crescent, was demolished and redeveloped with 40 supported-living homes for social rent and shared ownership.



¹¹ <u>https://www.stalbans.gov.uk/news/more-council-homes-delivered-0</u>

4 REVIEW OF KEY ISSUES AND CHALLENGES

- 4.0.1 Current delivery rates are below thresholds as set out in the Government's new Housing Delivery Test guidelines. A number of issues are contributing to this.
- 4.0.2 The council has gathered a range of evidence and views from key stakeholders involved in the planning and housing supply process. This is in order to better understand the key factors influencing and driving the (lower than Standard Methodology) delivery rates. The collected evidence has been considered alongside direct knowledge of local sites, land and development activity. A number of key themes emerge from this.

4.1 Planning process

- 4.1.1. Whilst there is a presumption in favour of sustainable development, the anecdotal perception of some stakeholders is that individual planning decisions do not always reflect this. It is perceived by some stakeholders that this can adversely affect housing delivery in the district.
- 4.1.2. Anecdotal evidence from applicants and agents suggests that the process of agreeing developer contributions to affordable housing and infrastructure through legal agreements (Section 106 agreements) can delay delivery.

4.2 Site availability

4.2.1 Table 3 shows that the majority of development in St Albans District is on previously developed land (PDL). This comprises 88% between 2001 and 2020. This equates to 7,471 dwellings on PDL and 992 dwellings on Greenfield land.

Table 3 - Monitoring Report 2020: SACD Dwellings Completions (Gross) on Previously Developed Land (2001/02 – 2019/20)

	Dwelling Completions (Gross)					
Monitoring Year	Previously Developed Land	Greenfield	Total	Percent Previously Developed Land (%)		
2001/02	371	21	392	95		
2002/03	295	54	349	85		
2003/04	267	25	292	91		
2004/05	612	34	646	95		
2005/06	368	11	379	97		
2006/07	437	3	440	99		
2007/08	317	22	339	94		
2008/09	457	9	466	98		



2009/10	327	3	330	99
2010/11	433	61	494	88
2011/12	413	55	468	88
2012/13	217	183	400	54
2013/14	342	162	504	68
2014/15	321	77	398	81
2015/16	408	49	457	89
2016/17	358	46	404	89
2017/18	456	37	493	92
2018/19	677	62	739	92
2019/20	395	78	473	84
Total (% PDL				
Average)	7,471	992	8,463	88

- 4.2.2. 81% of the land in the district is Green Belt and this constrains development. This means there is limited land available for development and redeveloping brownfield sites provides its own challenges. There can be clearance/demolition and remediation costs which can make development less attractive to developers.
- 4.2.3. The Windfall Topic Paper¹² shows that 84% of the overall net residential completions came forward as Windfall sites between 2010/11 to 2019/20. Sites under 10 units has been identified as a consistent source of housing land supply, including PDL in the Green Belt. The paper suggests that B1(a) Offices (now use Class E) will continue to be a reliable source of supply, along with B2 general industry.
- 4.2.4. Further trends suggest that companies are now demanding a decrease in office floor space¹³. Additional permitted development right changes have also come into effect. These will allow for more homes to be built. Details of permitted development changes have been reported to Planning Policy Committee on 8 September 2020¹⁴.
- 4.2.5. The ONS survey¹⁵ suggests Covid-19 has had a significant impact on all business sectors. In particular, businesses that occupy offices such as administrative, professional services and information and communication sectors. The overall pattern is that more people are working from home in response to national coronavirus measures.

https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/bulletins/coronavirusandtheeconom icimpactsontheuk/19november2020



¹² https://stalbans.moderngov.co.uk/documents/s50048193/PPC%20Dec%202020%20-

^{%20}Updated%20Draft%20Windfall%20Topic%20Paper.pdf 13 https://www.bbc.co.uk/news/business-53901310

https://stalbans.moderngov.co.uk/documents/s50046706/Amendments%20to%20the%20General%20Permitted %20Development%20Order%20and%20the%20Use%20of%20Classes%20Order.pdf

4.2.6. Figure 2 shows the proportion of furloughed, working from home and office-based workers.

Figure 2 - Working arrangements, businesses that have not permanently stopped trading, broken down by industry, weighted, UK, 19 October to 1 November 2020 (source: ONS Business insights and impacts on the UK: 19 November 2020)



4.2.7. There can also be site specific constraints which can cause delays in bringing forward development:

- Complex landownership with multiple land parcels
- Viability and planning obligations
- Heritage constraints (conservation areas, listed buildings)
- Land contamination
- Access to/from the site



- 4.2.6. COVID-19 will have affected the housing delivery in 2020. This situation will be the same across the country. It is likely that the delivery will have slowed down due to social distancing requirements on construction sites. The Government has introduced National measures in response to the Covid-19 pandemic in a bid to help stimulate the housing market. Incentives such as the Stamp Duty Land Tax exemption and extension of the Help to Buy scheme. These measures will help in the short term to ensure resilience in the property market. Overall, this is more significant for the District due to the high house prices described in section 2.
- 4.2.7. Much of the land in the District has high heritage and conservation value. There are over 800 listed buildings within the District and 19 conservation areas. The District has a wealth of below ground heritage and archaeology, ranging from internationally significant sites to ones of more local interest. There are three types of protected archaeology within the St Albans District: Scheduled Monuments, Archaeological Sites for Local Preservation, and Archaeological Sites subject to Recording condition. This combination means the District has a high quality, distinctive landscape with significant landmarks and strategic views. The presence of these landscape and heritage characteristics results in limited development opportunities for delivering new housing on a large scale.

4.3. Review of key issues

- 4.3.1. The national Planning Policy Guidance (PPG)¹⁶ sets out recommendations that local authorities can review as part of the Housing Delivery Test Action Plan.
- 4.3.2. The details for reviewing key issues and challenges are set out in Table 4 below:

<u>Table 4 – Areas suggested for review from the Planning Practice Guidance</u> (PPG) and St Albans City and District (SACD) review

Planning Practice Guidance (PPG)	Analysis review of key issues – in St
Suggested areas for review	Albans City & District (SACD)
Barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales;	There is no evidence that there are any significant barriers to early commencement in the district

¹⁶ <u>https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test--action-plans</u>



Barriers to delivery on sites identified as part of the 5 year land supply (such as land banking, scheme viability, affordable housing requirements, pre- commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.)	There is no evidence that there are any significant barriers to delivering sites that have obtained planning permission.
Whether sufficient planning permissions are being granted and whether they are determined within statutory time limits	The step-change in the Government's housing requirements can only be delivered through the adoption of a new Local Plan that will almost certainly require the council to release Green Belt. Until that time sufficient permissions to deliver an average of 893 homes per annum are not being granted. Planning applications are being determined in time in the very large majority of instances.
	The planning performance tables below shows that the Council is meeting MHCLG's performance targets. Where it is shown that the average determination period is higher than the statutory determination target, this is likely due to the council requesting additional details / amendments – often in order to give a positive recommendation. In these instances Extensions of Time (EOT's) have been agreed.
	*See Planning Performance tables below
Whether the mix of sites identified is proving effective in delivering at the anticipated rate.	There is no evidence that the mix of sites approved is negatively affecting delivery
Whether proactive pre-planning application discussions are taking place to speed up determination periods	The Council is undertaking proactive pre- planning application for all major development schemes.
The level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery	A new call for sites will be undertaken at the start of 2021 to identify sites that can potentially be developed as part of the draft Local Plan. Part of this process will involve consulting key stakeholders.
Whether particular issues, such as infrastructure or transport, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable	Infrastructure and transport have been addressed at the strategic level in work with HCC and with neighbouring and nearby authorities



4.4 Planning Performance

4.4.1. Tables 5 and 6 below shows the Council's performance and trend against Government targets. Within the five South West Hertfordshire Local Authorities, the District ranks third in its performance outputs.

<u>Table 5 – Development Management performance against nationally set</u> <u>Ministry of Housing, Communities and Local Government (MHCLG) 2 yearly</u> targets¹⁷

Measure and Type of Applications	Bigger or Smaller is Better	Current 2020 Performance in 2 Year Assessment Period	2 Year Assessment Period	MHCLG's Thresholds and 2 Year Assessment Period	
Speed of major development (% determined in time)	Bigger	87.2% (Oct 2018 to Aug 2020)	93.3% (Oct 2017 to Sept 2019)	60% (Oct 2018 to Sept 2020)	
Quality of major development (% overturned at appeal)	Smaller	4.1% (Apr 2018 to Mar 2020)	8.3% (Apr 2017 to Mar 2019)	10% (Apr 2018 to Mar 2020)	
Speed of non- major development (% determined in time)	Bigger	83.2% (Oct 2018 to Aug 2020)	90.1% (Oct 2017 to Sept 2019)	70% (Oct 2018 to Sept 2020)	
Quality of non- major development (% overturned at appeal)	Smaller	1.3% (Apr 2018 to Mar 2020)	1.6% (Apr 2017 to Mar 2019)	10% (Apr 2018 to Mar 2020)	

Colour coding for table: Green – performance above threshold.

*MHCLG announced the special measures programme will continue up to 2020. The table has been adjusted to reflect the updated 2 Year assessment periods.

*% of decisions overturned at appeal – appeal decisions are scrutinised by officers to inform future decision making.



¹⁷ <u>https://www.gov.uk/government/publications/improving-planning-performance-criteria-for-designation</u>

Application Type	Target	% in	% in	Average Apr – June 20- 21	Average Jan – Mar 19- 20	Average Oct – Dec 19- 20	Average July- Sept 19- 20
Major Applications	13 weeks (national) 60% in time	94.1%	82%	20.1 weeks	23.2 weeks	16 weeks	30.7 weeks
Minor Applications	8 weeks (national) 65% in time	70%	81.6%	12.1 weeks	11.5 weeks	12.6 weeks	12.9 weeks
Householder Applications	8 weeks (national) 80% in time	81.3%	82.9%	9.3 weeks	9.8 weeks	9.4 weeks	10.4 weeks

<u>Table 6 - Development Management performance against statutory</u> <u>determination periods¹⁸</u>

¹⁸ <u>https://www.gov.uk/guidance/determining-a-planning-application#what-are-the-time-periods-for-determining-a-planning-application</u>



5 THE WAY FORWARD

5.1 Improved planning process and consistency in decision making

- 5.1.1. The Council recognises the importance of its planning service in enabling and supporting growth. It is committed to ensuring the delivery of an efficient and effective service. To successfully deliver the larger strategic sites, experienced Planning Officers are needed to process applications and address any issues or barriers raised by developers, landowners and residents. These will be especially needed as a new Local Plan is progressed.
- 5.1.2. The details for actions and responsibility for delivery are set out in Table 7 below:

Suggested Actions from the Planning Practice Guidance (PPG)	St Albans City & District Action	Expected Outcomes	<u>Key roles and</u> responsibilities
Working with developers	The Council will work on	It is expected that this would lead to	Planning & Building
on the phasing of sites, including whether sites can be subdivided	developing early work, including Masterplans where appropriate, to assist in the timely submission of planning applications on key emerging draft Local	the housing delivery targets being met during the new Local Plan period.	Control (Major Projects Team and Development Management Team))
Offering more pre- application discussions to ensure issues are addressed early	Plan sites. Review and improve S106 procedures including a ensuring a consistent approach to negotiations, decision making and streamlining of internal processes	It is expected that this would lead to the housing delivery targets being met during the new Local Plan period.	Planning & Building Control (Development Management Team) and Hertfordshire County Council
Considering the use of Planning Performance Agreements	Continue to use and refine Planning Performance Agreements as a way of managing and resourcing larger and/or more complex schemes. This should include where appropriate a specific focus on ensuring efficient use of and then discharge of conditions to support	A reduction in the time taken for construction work to commence after permission has been granted	Planning & Building Control (Development Management and Major Projects Team)

Table 7 - Areas suggested for action from the Planning Practice Guidance (PPG) and St Albans City and District (SACD) actions and outcomes



Suggested Actions from the Planning Practice Guidance (PPG)	St Albans City & District Action	Expected Outcomes	Key roles and responsibilities
	quicker commencement on site.		
Carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites	New Call for Sites to be carried out in early 2021 to support new Local Plan	It is expected that this would lead to the housing delivery targets being met during the new Local Plan period.	Planning & Building Control (Planning Policy Team)
Revising site allocation policies in the development plan, where they may act as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies	The council is commencing a new Local Plan. As part of this, site allocations will be revised and updated in line with the new Housing Economic Land Availability Assessment.	It is expected that this would lead to the housing delivery targets being met during the new Local Plan period. It is expected that densities would increase whilst keeping design quality.	Planning & Building Control (Planning Policy Team)
Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use	Annual monitoring and review of the impact of Article 4 directions (office to residential) to housing delivery rates on the Housing Trajectory	The permitted development enabling conversion from office to residential use had resulted in a significant loss to office space within the district and gain of residential, even with the existing Article 4 areas.	Planning & Building Control (Planning Policy Team)
Engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed	Continue to monitor build out rates through annual monitoring survey and publish results through the Authorities Monitoring Report.	Ensures barriers to delivery can be identified and discussions held to enable development to progress	Planning & Building Control (Planning Policy Team)
	Engage with stakeholders on-site and make note of barriers to development (where development has stalled)	Ensures barriers to delivery can be identified and discussions held to enable development to progress	



Suggested Actions from the Planning Practice Guidance (PPG)	St Albans City & District Action	Expected Outcomes	Key roles and responsibilities
	To monitor on-site and review stalled development sites with the aim of supporting delivery	Ensures barriers to delivery can be identified and discussions held to enable development to progress	
	Engage and discuss delivery at least once a year with professional agents, including through regular Agents Forum.	Ensures barriers to delivery can be identified and discussions held to enable development to progress	
Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed	Consider whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed	Ensures that the Planning and Building Control Department can support future housing delivery and wider growth through ongoing service improvements	Planning & Building Control (Development Management Team)
Ensuring evidence on a particular site is informed by an understanding of viability	Now withdrawn draft Local Plan contains recent evidence work on viability which shows that viability is generally strong across the district. This will be updated as work on the new Local Plan is taken forward.	Ensures that when the site is put forward it is robustly assessed for viability that can be addressed at an earlier stage of development	Planning & Building Control (Planning Policy Team)
Considering compulsory purchase powers to unlock suitable housing sites	No current evidence to suggest CPO will boost delivery. Potential use of CPO will be kept under ongoing review		Planning & Building Control (Development Management Team)
Revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development that	New Local Plan is being drafted. As part of this the Council will use a new HELAA process in early 2021 to identify suitable sites for new homes.	It is expected that this would lead to the housing delivery targets being met during the new Local Plan period.	Planning & Building Control (Planning Policy Team)



Suggested Actions from the Planning Practice Guidance (PPG)	St Albans City & District Action	Expected Outcomes	Key roles and responsibilities
could increase delivery rates, including public sector land and brownfield land			

Additional Actions are set out below:

5.2. Working with neighbouring authorities

5.2.1. The Council is committed to working with neighbouring authorities. For example it is working closely with Dacorum, Hertfordshire County Council, Hertfordshire Local Enterprise Board and the landowners with regard to a potential cross-boundary Garden Community at Hemel Garden Communities.

Actions

- Actively co-operate with neighbouring local authorities to identify and bring forward sites; including potential cross-boundary opportunities such as Hemel Garden Communities
- Progress the new draft Local Plan
- Progress the SWH Joint Strategic Plan to address the approach to the 5 LPA South West Herts area, including over the longer term 2036 to 2050

5.3 Build homes on Council owned land

- 5.3.1. The Council has commenced site clearance works on the redevelopment of the City Centre Opportunity Site (south), having purchased land from other landowners to consolidate the site. This site currently has permission for 86 units. This comprises of 30 social rented, 10 shared equity and 46 market apartments. There is also a current planning application seeking to increase the number of units. The application comprises of 93 units, to include 33 social and 60 market apartments. The Council is also progressing early work on a further development at City Centre Opportunity Site (north) which will in due course be subject to a planning application.
- 5.3.2. The Council is also actively developing small and medium sized sites across the District. The Holyrood Crescent garage site has permission for 2 twobedroom houses. The Noke Shot development in Harpenden has permission for 4 three-bedroom social rented houses, 4 three-bedroom houses and 2 two-bedroom bungalows for sale. The Leyland Avenue (the former Sopwell Youth Centre) site has permission for 7 three-bed houses.



- 5.3.3. There is currently a planning application submitted and under consideration to redevelop the existing mobile homes and provide permanent housing on the Hedges site. This consists of 12 units, comprising six, three bedroom semi-detached houses, four, one bedroom flats and four, two bedroom flats.
- 5.3.4. Subject to planning permission, the Council also intends to redevelop more sites in future. The King Offa and Norman Close mobile home site has been identified for social housing. The Council intends to redevelop the Harpenden Public halls site through the Harpenden Neighbourhood Plan site allocation and policy. The Council is looking to provide 10 social and 16 market apartments.

Actions

- Continue to identify and acquire land for development/redevelopment
- Continue to redevelop Council owned garage sites
- Continue to redevelop existing temporary accommodation to permanent dwellings

Actions as set out in the Corporate Plan are:

2019-2025

- Try to identify additional sites where more homes could be built on Council land
- Identify funding options for delivering more affordable homes.
- Setting up a development company
- Delivering housing on council own land
- Providing a sheltered housing redevelopment program

5.4 Improve communications between agents and developers

5.4.1. The Planning Department holds six monthly meetings with planning agents to discuss topics of mutual interest and these will continue.

Actions

- Continue with the Agents Forum to help identify what is needed to reduce barriers to delivery.
- Ensure that pre application meetings are actively promoted and carry out a satisfaction survey to identify any process improvements required.

5.5 Monitoring

5.6.1. A more active approach to monitoring the implementation of planning permissions is required. This is so that the Council can understand the reasons for any delay in bringing forward sites and take action to mitigate this wherever possible.



Action

• Review the outputs of the Compliance and Monitoring Officer to ensure delivery of housing is prioritised.

6 Next Steps

- 6.1. The actions set out above will be monitored and reviewed on an annual basis. Monitoring information will be collected from a variety of sources. This includes the Authority Monitoring Report, the Corporate Plan, Quarterly Returns, appeals monitoring and housing trajectory along with any other relevant documents.
- 6.2. The Council will continue to maintain a strong housing-related evidence base and set future goals for housing delivery to support increased housing delivery.