

**Matter 3 – The Spatial Strategy, Settlement Hierarchy and Development Strategy (Policies S1 and S2)**

**Main Issue**

**Whether the Spatial Strategy, Settlement Hierarchy and Development Strategy is justified, effective and consistent with national policy.**

**1. Question 1**

**What is the basis for the overall spatial strategy and broad distribution of growth set out in policy S1? What options were considered and why was this chosen?**

- 1.1. The basis for the overall spatial strategy and broad distribution of growth set out in Policy S1 is a direct response to the relevant Statute and national policy, principally set out in the NPPF. In simple terms, following the NPPF, the basis has been to start by making the best use of previously developed land (PDL) in existing settlements (and PDL in the Green Belt as far as it is compatible with NPPF paragraph 145 (g)) first. This includes maximising development opportunities in existing urban areas, where consistent with good design and employment/economic development and community needs. As explicitly set out in the Plan, development must make efficient use of land by increasing the density and height of development, particularly in the most accessible parts of the main urban settlements. There are not considered to be realistic 'options' as alternatives to this starting point.
- 1.2. Evidence shows that even with a 'maximising' approach, there is clearly limited urban capacity and all land outside of existing towns or large villages is in the Green Belt. There is no reasonable prospect of neighbouring LPAs meeting St Albans' needs (following the Government's 'standard methodology') and therefore the Plan makes specific revisions to Green Belt boundaries, with efficient use of land, to accommodate needs that cannot reasonably be met in the existing urban areas. The locations for these Green Belt boundary revisions was determined by a Strategic Sites Selection process, informed by the SA work, which identified which sites would best meet the identified need, having regard to Green Belt harm and other relevant considerations, including whether they are suitably located and deliverable/developable. There have been alternative 'options' considered, including 70 strategic scale sites assessed through the Strategic Sites Selection process and alternative Amber-rated sites, but the Broad Locations chosen were specifically considered to be better performing against the alternative options.
- 1.3. The advantages of strategic scale sites in the Green Belt (Broad Locations) over the option of smaller ones was an explicit evaluative choice made by the Council. The consideration was based on a judgment that the strategic scale sites offer infrastructure and community benefits in a way that small sites do not (for example, all of the Broad Locations in the draft LP will be providing at least one school within the Broad Location).
- 1.4. The Council's approach with regard to the Green Belt and 'options' was in particular set out in detail in the Green Belt Topic Paper ([ED 25C](#)) at paragraphs 1.1-1.27.
- 1.5. Further detail regarding the 'options' considered are set out in considerable detail within the SA ([CD 009](#)) principally at chapter 4 pages 28-49; and also in the SA Appendices, principally at Appendix E and Appendix F ([CD 010](#)). They are also addressed in the SA Addendum

([CD 012](#)). Options considered are also set out in detail in the Green Belt Topic Paper ([ED 25C](#)) at paragraphs 1.1-1.27.

- 1.6. The key NPPF paragraphs and sections include: paragraph 15; paragraph 17; paragraph 20; sections 9 'Promoting sustainable transport'; 11 'Making effective use of land' and 13 'Protecting Green Belt land', noting in particular at NPPF paragraph 117:

*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land<sup>44</sup>.*

## Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.

### 2. Question 2

#### Is the growth in large villages consistent with their position in the settlement hierarchy set out in policy S1?

- 2.1. Yes, in context, the Council considers that the growth in the large villages is consistent with their position in the settlement hierarchy set out in policy S1. The hierarchy in LP Policy S1 is a minor evolution of that in the current adopted Local Plan ([St Albans District Local Plan Review 1994 - DLPR](#)), *Policy 2 Settlement Strategy*. The proposed LP policy uses the term *large villages* instead of *specified settlements*. This change is to move to a more commonly understood title and is not of itself a change of policy approach. The large villages are primarily going to grow through incremental redevelopment, change of use and infilling, including as set out at S1 "Development must make efficient use of land by increasing the density and height of development".
- 2.2. As addressed in detail in response to other MIQs, the Plan prioritises growth within urban areas, then in Broad Locations (BLs) identified in the Strategic Site Selection work (primarily itself based on Green Belt work). Only one of the large villages is proposed for significant growth in the LP; West of Chiswell Green. This is also the smallest of the Broad Locations (365 dwellings). The Policy S1 hierarchy directs the large majority of growth (in the form of Broad Locations / strategic Green Belt releases) to the *Towns* (including London Colney, newly classified as such).
- 2.3. Whilst the Broad Location was primarily identified through the work set out above, it can be noted with regard to Chiswell Green that it does also benefit from:
- Existing local primary education – to be enhanced by provision of a new primary school site within the BL
  - Close proximity to the local shopping facilities
  - Relatively close proximity to St Albans City with its higher order retail and service offer
  - Good bus services to St Albans City and Watford for access to employment and a wider service offer
  - Relatively good access to the Abbey Rail Line
- 2.4. It can also be noted that the main substantive changes from the adopted 1994 Plan are:
- Hemel Hempstead is noted as *Town*. Though outside the District (in Dacorum Borough), the LP proposes eastern expansion into the District. Thus, recognising its role / classification as part of the LP settlement hierarchy (and spatial strategy) is necessary
  - London Colney is classified as a *Town*, rather than a large village. This is primarily as a result of residential growth of the settlement in the last 30 years. There has also been retail growth at the Colney Fields Shopping Park. The change also results from

the growth now proposed for the settlement in the LP including the new 'through' primary and secondary schools

- The proposal for a new settlement – *Park Street Garden Village* will create a new *Category 2 Large Village* excluded from the GB
- For Category 3 settlements (those that make an important contribution to the openness and functions of GB and are therefore 'washed over'), boundaries are defined to indicate where L5 – Small Scale development in Green Belt Settlements are considered. This is a refinement of policy designed to respond directly to the updated approach to national GB policy introduced in the NPPF
- Inclusion of a new Category 4 'Rest of the Green Belt' area covering the rest of the District / GB and including the remaining scattered forms of settlement.

**3. Question 3**

**Has the settlement hierarchy taken account of facilities in neighbouring settlements, outside of the local authority's boundary? If not, should it?**

- 3.1. Yes, the settlement hierarchy has taken account of facilities in neighbouring settlements, outside of the local authority's boundary. This includes specifically at S1 the role of Hemel Hempstead as a *Town* and a focus for major development / expansion into the District. Hemel Hempstead is specifically recognised in the settlement hierarchy for that reason. The town will provide the main focus for accessible higher order facilities and services for the four East and North Hemel Broad Locations. This is an important part of the Plan, as addressed in more detail in response to other MIQs.
- 3.2. There are clearly relationships and use of facilities across the boundaries – such as for education, shopping, employment, leisure etc. which are addressed in more detail in response to other MIQs. There will also be substantial growth and growth of facilities across boundaries in coming years, such as at Welwyn & Hatfield, Dacorum, Central Beds etc. These have been considered in terms of both 'known' and 'potential' growth and will be kept under ongoing review. Overall, in the circumstances of the District and adjoining districts/boroughs, there are no other instance where the cross boundary relationship of settlements and facilities is considered to require a direct impact on the Plan's settlement hierarchy.

**4. Question 4**

**Does the Plan clearly set out the approach to be taken to proposed development in the countryside? If not, should it?**

- 4.1. Yes, the Council considers that the Plan clearly sets out the approach to be taken to proposed development in the countryside. It is important to bear in mind that in this District all of the 'countryside' (land outside of defined settlements excluded from the Green Belt) lies within the Metropolitan Green Belt. The LP addresses this primarily through the Spatial Strategy and Settlement Hierarchy (Policy S1), Green Belt policy (NPPF and Policy S3) and the Broad Locations (Policy S6). Including the impacts of new growth in the Broad Locations, the clear priority is given to: concentrating development in the City and Towns (S1 'Category 1'); then in the Large Villages (S1 'Category 2'); then in the Green Belt Settlements (S1 'Category 3'); and with an explicit new 'Category 4 'Rest of the Green Belt' – which equates in this District to the 'countryside', wherein there is "Very limited scope for development under National and Local Green Belt policy".

**Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.**

**5. Question 5**

**Is there a need to define settlement boundaries?**

- 5.1 Yes, the Council considers that there is a need to define settlement boundaries. These have been set out indicatively in the draft LP on the Key Diagram at figure 1 on page 11 and in detail on the Policies Map in [CD 003](#).
- 5.2 The District is entirely washed over by the Metropolitan Green Belt and so there is a particular imperative to clearly define settlement boundaries. This is relevant primarily for settlements excluded from the Green Belt in order to define the Green Belt boundaries. This includes where boundaries will be altered by the inclusion of the Broad Locations in the Plan.
- 5.3 It is also necessary to define settlements washed over by the Green Belt, in order to help define what is 'inside' or 'outside' a village. This complies with NPPF paragraph 145 e) "limited infilling in villages". It is also relevant for some policies in the draft LP itself, such as Policy L5 - Small Scale Development in Green Belt Settlements.
- 5.4 Paragraph 139 f) of the NPPF sets out when defining Green Belt boundaries that Plans should;

*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

**Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.**

**6. Question 6**

**Is the proposed development strategy set out in policy S2 appropriate and realistic?**

- 6.1 Yes, the Council considers that the proposed development strategy set out in policy S2, in combination with the other Policies in the Plan, is appropriate and realistic. The development strategy prioritises development in the most sustainable settlements (including through their expansion via Broad Locations). All 'Category 1' settlements and one Category 2 settlement (Chiswell Green) will be expanded at 'Broad Locations' for development. A new settlement, 'Park Street Garden Village', will be created and designated as Category 2. These locations minimise adverse impacts on the purposes of the Metropolitan Green Belt.
- 6.2 The policy also directly addresses the necessary consideration of 'exceptional circumstances' required to make changes to existing Green Belt boundaries. It sets out that there are exceptional circumstances that necessitate major development in locations previously designated as Green Belt.
- 6.3 As set out in more detail in response to Matter 5 Question 6, the Council has in the Local Plan set out clearly the overall strategy for the pattern and scale of housing development and that this will be wholly provided for by the Plan. There is no overall need for additional housing requirements from Neighbourhood Plans / Neighbourhood Areas. However the Local Plan does provide a role for Neighbourhood Plans to deliver more housing where the local evidence supports it. This is effectively additional housing 'on top' of the requirement for housing which is directly provided overall through the Local Plan itself. This is set out at S2 (Development Strategy) (including the proposed minor modification as at [CD 024](#)), and also L4 (Affordable Housing) and L5 (Small Scale Development in Green Belt Settlements).

**7. Question 7**

**Will this provide a sufficient mix of sites and provide the size, type and tenure of housing to meet the needs of different groups in the community? Does this reflect the evidence from a local housing needs assessment?**

- 7.1. Yes, the development strategy will deliver an appropriate mix of sites to provide the size, type and tenure of housing to meet the needs of different groups in the community. As set out in response to Matter 8 Questions, these will come from four main sources:
- (a) Existing planning permissions
  - (b) Other commitments e.g. sites subject to S106 agreements
  - (c) Proposed site allocations (the Broad Locations)
  - (d) Other sources
- 7.2. As set out in more detail in response to Matter 5 Questions 6, it is also considered important to note that while there is no overall need for additional housing requirements from Neighbourhood Plans / Neighbourhood Areas, the Local Plan does provide a role for Neighbourhood Plans to deliver more housing where the local evidence supports it. This is effectively additional housing 'on top' of the requirement for housing which is directly provided overall through the Local Plan itself.
- 7.3. Taking them in brief in turn:
- (a) & (b) There is a large range of scales and locations of existing permissions. These vary from 1 to 348 homes in scale. They will provide for needs geographically across all settlements and through PDL in the Green Belt outside of settlements. This includes the one large green field Green Belt site at East St Albans currently being constructed as part of a scheme for the substantial redevelopment of the Oaklands College site (referred to in S6v).
  - (c) The Broad Locations in the Plan provide a mixed, robust and attractive range of geographic locations, types, tenures and scales of housing. These vary in particular in terms of scale, from 365 homes to 2,400; which itself is part of four closely linked Broad Locations of 5,500 homes in scale; which itself is part of the wider cross-boundary HGC project of circa 11,000 homes in scale. It is considered a strong and notable feature that this Plan is providing for such a range of scales from 1 – 11,000 homes. Given the green field nature of these sites and the confirmation from the landowner /developer teams in 2018 that all Plan policies are deliverable (see other MIQ responses for more details), the Broad Locations are a particular focus for meeting affordable housing needs, particularly social rented housing, and also specialist accommodation needs. The robust viability of these sites and their spread across the District means that they can very directly provide for the size, type and tenure of housing to meet the needs of different groups in the community. As in most Districts, urban sites are predominantly smaller and are often much more limited by their nature and viability limitations on the range of housing needs that they can meet.
  - (d) As dealt with in more detail in response to Matter 8 Questions, windfall is a very strongly consistent feature in the District and will continue to play a significant role

across the Plan period. These will continue to provide variety in terms of location, size, type and tenure of housing.

- 7.4. The evidence relied upon in terms of the size, type and tenure of housing to meet the needs of different groups in the community is principally that in the 'Independent Assessment of Housing Needs and SHMA Update' 2016 ([HOU 3](#)). There is also relevant data in the 'South West Hertfordshire Strategic Housing Market Assessment' 2016 ([HOU 1](#) and [HOU 2](#)). These evidence sources have informed the Plan and the size, type and tenure of housing to meet the needs of different groups in the community have been directly addressed in the Plan, primarily at: "Policy L1 - Housing Size, Type, Mix and Density"; "Policy L2 – Provision of Older Persons Housing and Special Needs Housing"; and "Policy L3 - Provision of and Financial Contributions towards Affordable Housing". Again, it is considered important to note the key role of the Broad Locations in directly and viably delivering the range of needs set out in these Plan policies.
- 7.5. It is considered important to note that the South West Herts South West Hertfordshire Local Housing Needs Assessment (On behalf of Dacorum, Hertsmere, St Albans, Three Rivers and Watford Councils) was commissioned by the five LPAs in late 2018. Its purpose effectively is to update the SWH SHMA 2016 to be an NPPF 2018 (and now 2019) compliant Local Housing Needs Assessment. Because of a variety of circumstances within both the 5 LPA client team and the selected consultants, GL Hearn, the evolving draft study is still not sufficiently complete to support publication at this time. It is anticipated that this will be published relatively in early 2020.

## **Councils Response to Stage 1 Matters, Issues, Questions - Thursday 12 December 2019.**

### **8. Question 8**

**Should the Plan include some small and medium size sites in order to provide greater choice and flexibility and accord with NPPF paragraph 68?**

- 8.1. Yes, it is considered that it should include overall some small and medium size sites in order to provide greater choice and flexibility and in accordance with NPPF paragraph 68 and that it does so in a reasonable and appropriate way. The Plan directly addresses the issue at Policy S4, where it sets out:

*Small sites of half a hectare or less have been and will continue to be an important source of housing land supply. They also provide particular opportunities for smaller local and regional housebuilders. A list of current small sites with permission is set out at Appendix 5. They are all allocated for the currently permitted residential use. This list will be updated annually and published online as part of the Authorities Monitoring Report (AMR).*

- 8.2. The Plan at Appendix 5 'List of small residential sites with permission' sets out, at a base date of 1 April 2018, 293 sites of half a hectare or less. This appendix is intended to be updated to a 1 April base date as a 'minor amendment' as a factual update to the Plan in due course. It can be noted that this policy was drafted at a time when the Government had indicated that half a hectare would be the threshold, before the updated NPPF 2018 (and now 2019) was finalised. The 293 sites at Appendix 5 will together provide 820 dwellings. Taking on board the size threshold of one hectare, an additional 12 sites providing 238 dwellings has been identified, with a base date of 1 April 2018. This means a total of 1,058 homes have been identified.

- 8.3. The NPPF sets out at paragraph 68:

68. *Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

- 8.4. As set out in detail in response to Matter 8 Questions (and Matter 3 Question 9 below), evidence is compelling that windfall has long been and continues to be an important part of the supply of new dwellings in St Albans and will continue to be so in the future.
- 8.5. St Albans published its first Brownfield Land Register in 2017 and updated and published it again in 2018. Due to competing pressures on limited staff resources during the current Examination process, the 2019 BLR update is still ongoing and will realistically be published in early 2020. The Council has shown a commitment to the BLR process and will continue to do so.
- 8.6. Also, as set out in [ED 25C](#) (page 54) the draft Plan and in response to other MIQs, further small site opportunities in the (Green Belt) will be available through policies set out in the LP (eg rural exception sites) and through Neighbourhood Plans. This is set out at S2 (Development Strategy) (including the proposed minor modification as at [CD 024](#)), and also L4 (Affordable Housing) and L5 (Small Scale Development in Green Belt Settlements).
- 8.7. The draft Plan process is clearly based on identification of strategic level sites in the Green Belt (see Planning Policy Committee papers Item 10. - para 4.4 in particular). This is an appropriate approach to Green Belt review and release, bearing in mind 'exceptional circumstances' need to be demonstrated in order to justify any change to GB boundaries. More than sufficient provision to meet 'need' has been identified and specific small sites in the Green Belt have not been needed in the Plan.
- 8.8. The combination of the large existing number of small and medium sized sites and the number of dwellings identified in the Plan; the strong evidence of new small and medium sized sites emerging on an annual basis; and Councils' commitment to the BLR process; and the small site opportunities set out in the LP (eg rural exception sites and through Neighbourhood Plans); gives confidence that through the combination of the Plan and the annually updated BLR then there will in practice be sufficient small and medium size sites in order to provide greater choice and flexibility and a good mix of sites in order to accord with NPPF paragraph 68.

**9. Question 9**

**Does this strategy rely on windfall housing and if so, is this made clear in the Plan and is it based on the advice in paragraph 70 of the NPPF?**

- 9.1. Yes, the strategy does rely on windfall housing, because there is compelling evidence for it. The Council considers that this is made clear in Appendix 2 (the Housing Trajectory) of the Plan and it is indeed based on the advice in paragraph 70 of the NPPF.
- 9.2. The Local Plan Appendix 2 – Housing Trajectory sets out the Windfall calculations for the Plan period. An updated (1 April 2019 base date) Trajectory is also shown at M3Q9 Appendix 1. This average is based on the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends. The specific methodology as to how Windfall has been calculated is set out at M3Q9 Appendix 2. This is based on the NPPF paragraph 70 as set out below:
- 70. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.*
- 9.3. The Council has looked at Large Site (5 or more dwellings) completions since April 2008. These completions are based on known sites either through the SHLAA or pre-application meetings. This, combined with historic windfall delivery rates and expected future trends has been calculated and included in years 6-15 of the Plan on top of the expected number of homes to be delivered at each Broad Location. This has been carried out based on PPG - Housing and economic land availability assessment, Paragraph 023 Reference ID: 3-023-20190722 and set out below.

***Method – Stage 3: Windfall assessment (where justified)***

*Determining the housing potential of windfall sites where justified*

***How should a windfall allowance be determined in relation to housing?***

*A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework.*

- 9.4. Windfall is actively promoted through several policies in the Plan, including at Policy S1 – Spatial Strategy and Settlement Hierarchy, which sets out:

*Development must make efficient use of land by increasing the density and height of development. This will be encouraged, particularly in the most accessible parts of the main urban settlements...*

9.5. The Plan also encourages Windfall of small and medium sized sites as set out in Policy L5 - Small Scale Development in Green Belt Settlements and Policy L8 - Primarily Residential Areas. L5 and L8 are based on the strategy set out at Policy S1 - Spatial Strategy and Settlement Hierarchy.

9.6. Also, as set out in response to Matter 5 Question 6, there is no overall need for additional housing requirements from Neighbourhood Plans / Neighbourhood Areas. However, the Local Plan does provide a role for Neighbourhood Plans to deliver more housing where the local evidence supports it. This is effectively additional housing 'on top' of the requirement for housing which is directly provided overall through the Local Plan itself. This takes into the account the advice based on the NPPF paragraph 68 c) as set out below.

68. *Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

...

- c) *support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;*

**Councils Response to Stage 1 Matters, Issues, Questions Thursday 12<sup>th</sup> December 2019.**

**Matter 3 – The Spatial Strategy, Settlement Hierarchy and Development Strategy (Policies S1 and S2)**

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HOUSING TRAJECTORY: St Albans District Council 1 April 2019																			
Description	Land Supply - To 1 April																		Total
	5 Year Land Supply																		
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	
Under construction	300	220	259	178	135	126	147	10	0	0	0	0	0	0	0	0	0	0	1,375
With planning permission (full or reserved matters covering whole site)	0	0	11	72	187	65	62	31	27	0	0	0	0	0	0	0	0	0	455
Small Sites with permission*	48	60	62	59															229
Conversions with permission*	33	54	55	35															177
With outline permission with part(s) covered by reserved matters																			0
Outline only	0	0	0	8	-2	16	10	10	0	0	0	0	0	0	0	0	0	0	42
Where full. Outline or reserved matters at post committee resolution or subject to S106 negotiations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
With application submitted	0	0	-24	20	27	28	53	49	40	0	0	0	0	0	0	0	0	0	193
With pre-application discussions occurring	0	0	6	0	3	24	14	7	10	10	10	0	0	0	0	0	0	0	84
Allocation only	0	0	0	0	0	11	11	18	0	0	0	0	0	0	0	0	0	0	40
SHLAA Sites and other sites	0	0	0	0	0	0	10	30	0	0	0	0	0	0	0	0	0	0	40
Garage Sites Program	27	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	32
Windfall Allowance	0	62	92	105	111	123	123	123	123	123	123	123	123	123	123	123	123	123	1,968
Office to Residential Prior Approval (10% discount**)	225	111	5	0	38	0	0	0	0	0	0	0	0	0	0	0	0	0	379
Unanticipated delay factor***	0	-65	-65	-65	-65	-65	0	20	24	25	32	32	32	32	32	32	32	32	0
Total	633	441	407	411	434	328	430	298	224	158	165	155	155	155	155	155	155	155	5,014

\*90% assumption on unstarted permissions \*\*10% discount on unstarted permissions \*\*\*Unanticipated delay factor on unstarted permissions

Local Plan / NPPF Policies - Delivering Urban Optimisation

Intensification / Conversion of Employment Land				0	0	0	0	0	40	40	40	40	40	40	40	40	40	40	400
Council Owned Sites						0	0	0	20	20	20	20	20	20	20	20	20	20	200
Increased Density in Higher Buildings					0	0	0	0	20	20	20	20	20	20	20	20	20	20	200
Total	0	0	0	0	0	0	0	0	80	80	80	80	80	80	80	80	80	80	800

Local Plan - Inc. Broad Locations

	Pre plan period		Plan Period																	Post plan
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total	
Current known/expected delivery (2020-2036)	633	441	407	411	434	328	430	298	224	158	165	155	155	155	155	155	155	155	3,939	
East Hemel Hempstead (North) (1,650 not inc. circa 120 at Spencers Park PII)						75	140	180	180	180	180	180	180	140	100	65	50		1,650	
North Hemel Hempstead (1,500)														75	125	125	125	125	575	925
East Hemel Hempstead (South) (2,400)						75	140	180	180	180	180	180	180	180	180	180	180	180	2,195	205
North West Harpenden (580)				75	75	75	75	75	75	75	75	55							580	
East St Albans (902 + 348 already permitted)						75	100	100	100	100	100	100	100	25					900	
North St Albans (1,100)					75	120	120	120	120	120	120	120	120	65					1,100	
North East Harpenden (760)									75	75	75	75	75	85	75	75	75	75	760	
West of London Colney (440)								75	75	75	75	75	65						440	
West of Chiswell Green (365)							75	75	75	75	65								365	
Park Street Garden Village (2,300)	0	0	0	0	0	0	0	0	80	150	180	180	180	180	180	180	180	180	1,670	630
LP / NPPF - Delivering Urban Optimisation	0	0	0	0	0	0	0	0	80	80	80	80	80	80	80	80	80	80	800	
Trajectory Total	633	441	407	411	584	748	1,080	1,103	1264	1,268	1295	1200	1135	1060	920	860	845	795	14,974	1,760

NB: Trajectory Average 2020-2025; 2025-2030; 2030-2036

							646					1,226						936	936
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NB: Housing Requirement/Target - inc. 20% buffer for 2020-2025 and remainder averaged over 2025-2036

							535					1,085						1,085	913
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## M3Q9 Appendix 2

This appendix outlines the methodology applied by the Council to calculate the windfall allowance included as part of the Local Plan estimated housing land supply in Appendix 2 – Housing Trajectory. It also provides further information about several Housing Trajectory categories, including the unanticipated delay factor and the sub-categories of Local Plan / NPPF Policies – Delivering Urban Optimisation.

### Windfall Allowance

The Council has used three main sources to calculate its windfall allowance. These sources are based on the Strategic Housing Land Availability Assessment (SHLAA), historic windfall delivery rates and expected future trends. The sources have been considered based on the requirements of the NPPF set out at Paragraph 70 below:

- 70. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.*

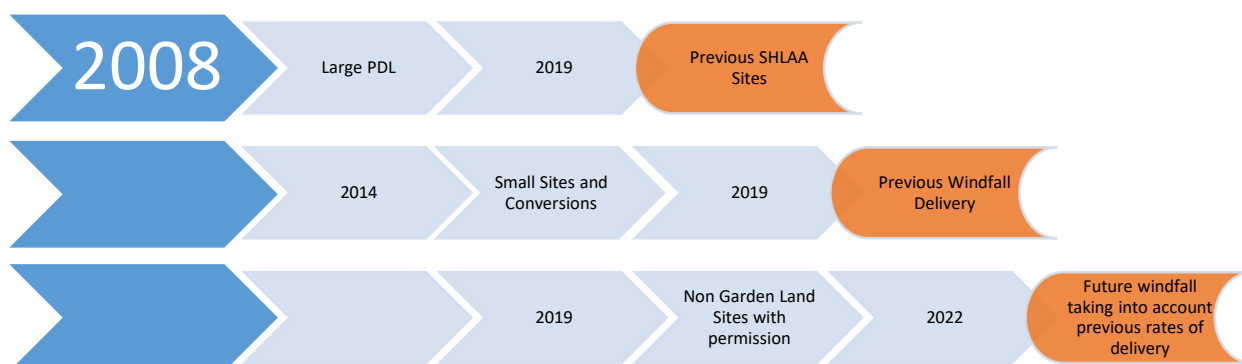
The Windfall Allowance is calculated by:

- 1) Calculating the historic annual average completions of Large Sites on Previously Developed Land (5 or more dwellings) from 1 April 2008 up to the Trajectory base date. It is important to note that the majority of Large Sites prior to completion were known to the Council, either through the SHLAA and/or extensive pre-application meetings prior to the application being submitted to the Council.  
Plus
- 2) Calculating the historic annual average of completions on both small sites and conversions (1 to 4 dwellings) for the previous five years up to the Trajectory base date. This captures previous delivery on windfall sites.  
Plus
- 3) Identifying the number of small site permissions (1 to 4 dwellings) that both (a) have been completed and (b) are yet to be completed from the Trajectory base date.
  - i. First, the percentage of small site permissions that are not located on garden land has been calculated. Garden Land has been excluded from the calculations because including it to calculate windfall would be contrary to NPPF paragraph 70 as set out above.

- ii. Second, the percentage of small site permissions that are not located on garden land has been applied to the annual average of small site completions for the previous five years.
  - iii. Third, the figure above is then added to the annual average of conversions (1 to 4 dwellings) for the past five years.
- 4) The three sources above are subsequently combined to provide an overall windfall allowance (average) figure. This figure is then divided into the future five years after the Trajectory base date and distributed in the Trajectory. From years 1 to 5, each consecutive year represents a higher percentage and higher windfall allowance figure. The stepped windfall allowance is based on the evidence that an increased number of dwellings will be completed from windfall sites over time. The windfall allowance figure for year 5 of the Trajectory is the assumed overall windfall allowance figure for year 6 and each year onwards until the end of the plan period. This is set out in the table below:

Year	Percentage of windfall allowance (average)
1	50
2	75
3	85
4	90
5	100
6 to end of Plan Period	100

An illustrated diagram with an example 1 April 2019 base date is shown below:



#### Unanticipated Delay Factor

Over a period of time, the Council's estimated totals have been accurate as tested at appeals and hearings. However, there has been a strong trend whereby even though the

evidence for individual sites has shown delivery at a certain rate, a percentage of development has consistently come forward more slowly than evidence has suggested, in an unanticipated way. Unforeseen circumstances that have caused unanticipated delays in recent years included the unanticipated Icelandic banking crisis and the unanticipated death of a key business owner.

### Local Plan / NPPF Policies – Delivering Urban Optimisation:

#### Intensification / Conversion of Employment Land

Land intensification is set out primarily in Local Plan Policy S1 - Spatial Strategy and Settlement Hierarchy, as shown below:

*Development must make efficient use of land by increasing the density and height of development. This will be encouraged, particularly in the most accessible parts of the main urban settlements (below).*

A primary focus to deliver land intensification will be in Category 1) City, Towns – Main urban settlements excluded from the Green Belt, as set out in the table below:

Category	Settlements	Broad policy approach
<b>1) City, Towns - Main urban settlements excluded from the Green Belt</b>	<i>St Albans Harpenden London Colney Hemel Hempstead – NB: currently within Dacorum Borough, but expansion into District planned</i>	These are the most accessible locations for development, with the widest range of services and facilities. Larger scale, higher density developments will be encouraged, but will need to respect local character and heritage.

Land Intensification is also set out in Local Plan Policy L8 - Primarily Residential Areas:

*Planning applications for development and redevelopment to provide additional residential dwellings will be supported in principle*

...

*Residential development/redevelopment, including residential infill development, will be encouraged subject to the site planning and design considerations, including as set out in Policies L23 and L24.*

A list of employment area designations from the District Local Plan Review 1994, which are not designated as Primarily Business Use Areas in Local Plan Policy L9 is set out below. This is supported by the approach taken as set out in Matter 5 – Employment Land.

Site Reference	Location
EMP.2	Batford Mill Industrial Estate, Harpenden
EMP.5	Redbourn Industrial Park, Redbourn
EMP.6A	Station Road, Wheathampstead
EMP.9	Council Depot and Adjoining Land, St Albans Road, Sandridge
EMP.13	Executive Park and Adjoining Land, Hatfield Road, St Albans
EMP.14	Camp Road / Campfield Road, St Albans
EMP.16	Wellington Road, London Colney
EMP.17	The Hertfordshire Business Centre, Alexander Road, London Colney
EMP.20	Watling Street, Frogmore

### Council Owned Sites

The Council has undertaken preliminary work to identify several sites in the District under Council land ownership, which have potential capacity for future residential development in the Local Plan period.

### Increased Density in Higher Buildings

Further measures to encourage urban optimisation are set out in Local Plan Policy S1 - Spatial Strategy and Settlement Hierarchy as shown below:

*Development must make efficient use of land by increasing the density and height of development. This will be encouraged, particularly in the most accessible parts of the main urban settlements (below).*

...

Category	Settlements	Broad policy approach
<b>1) City, Towns - Main urban settlements excluded from the Green Belt</b>	<i>St Albans Harpenden London Colney Hemel Hempstead – NB: currently within Dacorum Borough, but expansion into District planned</i>	These are the most accessible locations for development, with the widest range of services and facilities. Larger scale, higher density developments will be encouraged, but will need to respect local character and heritage.

This is also supported in Local Plan Policy L1 - Housing Size, Type, Mix and Density as set out below:

*Higher density development, including buildings of greater height than existing, will be encouraged, particularly in accessible urban locations with good access to services.*