

MATTER 8 – THE SUPPLY AND DELIVERY OF HOUSING LAND ANDERSON GROUP

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Matter 8: The Supply and Delivery of Housing Land

Introduction

- 1.1 These responses to the Inspectors' Stage 1 Matters, Issues and Questions (ED26) have been prepared by Bidwells LLP on behalf of Anderson Group who are promoting land at Boissy Close, Colney Heath, as a suitable site for Green Belt release.
- 1.2 For the avoidance of doubt, we have only included questions that are relevant to the representations previously made by Anderson Group.

Question 4 – Is the housing trajectory realistic?

- 1.3 Anderson Group does not consider that the housing trajectory at Appendix 2 of the Local Plan is realistic for a number of reasons.
- 1.4 Firstly, Paragraph 67 of the NPPF (2019) requires planning policies to identify a supply of:
 - Specific, deliverable sites for years one to five of the plan period (in this case this would be 2018/19 – 2022/23)
 - Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan (in this case this would be 2023/24 – 2035/36).
- 1.5 Draft Policy S2 explains that the Local Plan identifies a series of 'broad locations' (i.e. not specific allocations). However, in the housing trajectory, two sites are identified as starting to deliver in 2022/23, which given the revised definition of deliverable in the NPPF, should be properly identified as specific deliverable sites (allocations) or the trajectory pushed backwards if this is not possible.
- 1.6 If the SACDC's preferred approach is used whereby the start of the Local Plan period is 2020/21, the issue is compounded, and six of the ten broad locations should be reconsidered as allocations as they show completions in the first five years, contrary to the NPPF.
- 1.7 If this is accepted then there will be a significant dip in the trajectory from 2022 to 2026, which suggests there is a clear and pressing need to identify additional specific, deliverable sites, such as Boissy Close, which are capable of delivery in the early years of the plan period. In the absence of this, there is a risk that the District will continue to roll-over a structural deficit in housing delivery which becomes increasingly difficult to recover.
- 1.8 Related to this point, Anderson Group considers the assumptions regarding the lead in times for delivery on strategic sites as being over optimistic, even if they are considered as 'sites'. It is not realistic to expect sites of the scale of North West Harpenden and North St Albans to be planned and development sites opened up within two years, which is effectively what the authorities proposed trajectory suggests. Sites of such scale normally have lead-in periods of 5+ years which simply has not been allowed for. Irrespective of any issues with the definition of deliverable, the lead in times for strategic sites need to be pushed back which leaves a significant hole in the early years of the plan period.

- 1.9 In total, 1,220 homes are forecast to be delivered on strategic sites from 2020 to 2025. This means 36% of all supply is on sites which at the current time are only identified as broad locations. The trajectory therefore highlights the over reliance on strategic sites in the supply side, which reinforces the need for a sensible level of contingency in supply from small sites, addressed further under question 5 below.
- 1.10 The housing trajectory also includes provision for ‘delivering urban optimisation’. This equates to 880 dwellings between 2025/26 and 2035/36 comprising intensification/conversion of employment land, council owned sites and increased density in higher buildings.
- 1.11 This optimisation is not referred to anywhere else in the emerging Local Plan and therefore has no status or policy driver to implement it. It therefore lacks robustness and certainty. Furthermore, without explanation it can only be assumed that the council owned sites in this part of the trajectory are a duplication of the council owned sites in the ‘current known/expected element of the supply’, which also includes a significant windfall allowance, which again risks duplication.
- 1.12 The reference to ‘higher buildings’ is likely to relate to provisions in the draft revised NPPF in 2018 that did not make it into the final version now published, diminishing their status as deliverable supply.
- 1.13 Additionally, given that policies L9 and L10 of the Local Plan seek to prevent the loss of employment land there has to be uncertainty as to whether the intensification/conversion element of the supply is realistic.
- 1.14 Overall, there are a number of concerning issues with the trajectory including uncertainty with the delivery of strategic sites and the inclusion of numbers for ‘optimisation’ which lack evidence and appear to involve double counting.

Question 5 - The majority of the proposed housing will be provided on a small number of large sites. Does the Council have a contingency Plan should one or all of these sites not deliver as expected?

- 1.15 Anderson Group does not consider that there is insufficient contingency built into the draft Plan to deal with the potential shortfall in delivery from strategic sites.
- 1.16 As a starting point, the trajectory on page 84 of the submitted plan shows how 14,871 homes can be delivered over the plan period. This is just 263 homes over the housing requirement set out in policy S4 of the Plan (14,608 homes). This equates to just a 2% buffer which is clearly too low to allow for potential slippage in delivery, particularly when consideration is given to the volatile nature of the supply, which is heavily reliant on large development areas, the locations of which still need to be refined.
- 1.17 Anderson Group consider the Plan should plan for a minimum of 10% above the final housing target (noting other participants have questioned whether the current target is appropriate) and potentially up to 20%, given the heavy reliance on strategic scale development, which has the greatest potential for slippage.

- 1.18 There are sites within the SHLAA that could come forward and provide delivery earlier in the plan period, improving upon the trajectory and providing an element of contingency in the supply side. One such site, which is an exceptional candidate for such release, is land at Boissy Close which can be bought forward in the immediate terms by a developer with an unrivalled track record of delivery.

Question 7 - What are the implications of stepped delivery of housing on the supply and delivery of housing?

Question 8 - What impact will this have on the 5 year supply of deliverable housing land and the delivery of affordable housing?

- 1.19 Given the overlap, questions 7 and 8 have been addressed together.
- 1.20 The plan notes the total plan target to be 14,608 homes over the plan period. This equates to a target of 913 dwellings per annum. The plan proposes a split as follows:
- | | |
|-------------|---------------------------|
| 2020 – 2025 | 565 dwellings per annum |
| 2025 – 2030 | 1,075 dwellings per annum |
| 2030 – 2036 | 1,075 dwellings per annum |
- 1.21 The plan has not provided any justification for this stepped approach other than the need to ensure development is provided alongside infrastructure and services.
- 1.22 On the basis of the first period providing for a target of 565 per annum, and the likelihood of slippage in the delivery of a number of large sites, the plan is unlikely to provide for a five-year supply of deliverable housing land from adoption.
- 1.23 It is not considered that the heavy reliance on large broad locations provides sufficient justification for a step trajectory in the plan. The step is a result of the strategy approach the plan makers have chosen to take – not the lack of availability of land that could be delivered sooner.
- 1.24 It follows that as a result of the strategy there will be a lack of short-term delivery of much needed housing development in sustainable locations. This is alarming when considered in the context of recent under delivery and issues with affordability in the district, with the poor level of delivery proposed in the early years likely to cause worsening affordability.
- 1.25 The 565-home requirement in the early years equates to just 62% of the annualised housing requirement. As well as the impact on overall affordability, there will also inevitably be an impact on the delivery of affordable housing in the district. This is often just seen as a percentage of the overall requirement (40% in this case), but in reality, the requirement is a number of homes required each year.
- 1.26 The 40% target, which in itself is a reduction from the 75% (685 homes per year) which the SHMA shows is required, equates to 361 homes per year (40% of the annualised requirement of 913 per year).
- 1.27 At 40% of 565, in the early years, the plan will at best deliver 226 affordable homes per year – just 62% of the policy requirement (or 33% of the SHLAA requirement). In the context of the wider need

for affordable housing in the district, Anderson Group does not consider that this is acceptable, and the plan should be amended to ensure that sites which will support the delivery of affordable housing in the early years can come forward.

- 1.28 Affordability is considered to be one of the known fundamental existing issues that needs to be addressed in the district. Effectively delaying the delivery of homes would only act to worsen this issue and Anderson Group suggest a more pro-active and positive plan should be devised which steps in the opposite direction, frontloading delivery and helping to address the existing issue.
- 1.29 In reality, it is accepted that this may be difficult to fully achieve due to the infrastructure needed to facilitate development, but it needs to be borne in mind that back-loading the process will only serve to compound the existing affordability issue.

Question 14 - Is there sufficient variety in terms of the location and type of sites allocated?

- 1.30 As has already been acknowledged, Anderson Group consider that the strategy results in an over concentration of housing being planned within strategic sites in broad locations, with a lack of small to medium sized sites in the supply and a lack of balance in the strategy. This will be detrimental to the delivery of housing and could be avoided if there were a greater supply of small/medium sized sites.
- 1.31 Location - the housing delivered will be focussed in the broad locations, drastically limiting the choice and type of dwellings available across the District. This point is further enforced when it is noted that just under 30% of all housing identified within the plan is to be an urban extension of Hemel Hempstead, a town within a neighbouring authority (not including a further 1,000 dwellings beyond the plan period); significantly limiting the choice for existing St Albans District residents to find housing within the settlements of the district.
- 1.32 St Albans in comparison, the largest and most sustainable settlement within the district, is allocated just 6% of the strategic growth for the plan, even though there is significant scope to allocate land in the area.
- 1.33 Size and mix – as such a high proportion of housing land is identified as large-scale greenfield development, it is likely to be built out by volume housebuilders, limiting the choice of homes on the market and opportunities for small or medium sized developers, which are often well placed to bring forward delivery in a timely manner because they do not have the benefit of largescale landbanks.
- 1.34 Introducing a range of smaller sites would ensure that there are opportunities for a greater range of housebuilders to enter the market and deliver a more diverse supply of homes in the District.

