

ST ALBANS CITY AND DISTRICT LOCAL PLAN EXAMINATION

Matter 8: The Supply and Delivery Housing Land

Hallam Land Management and St Albans School

Main Issue: Whether the approach towards the supply and delivery of housing land is justified and effective and consistent with national planning policy.

Question 1. What is the estimated total supply of new housing in the plan period and how does this compare with the planned level of provision?

1. We understand that the Council's Housing Trajectory, Appendix 2 of the Publication Draft Local Plan provides the most up to date explanation of the components of housing land supply.
2. For the Plan period 2020-2036 the total supply is estimated to be 14,871 additional dwellings. This is comprised of:
 - Current known/expected delivery (2020-2036) 3906
 - Broad Locations 10085
 - Urban Optimisation 880
3. Policy S3 sets of "housing requirement/target" of 14,608 additional dwellings between 2020-2036.
4. This amounts to a theoretical overprovision or flexibility of about 2%.

Question 2. What is the estimated total supply in the plan period from:

5. This is a question for the District Council to answer.

Question 3. Can the Council please provide a graph to show the housing trajectory and also a clearer, simpler table than that that in appendix 2 of the Plan.

6. This is a matter directed at the District Council.

Question 4. Is the housing trajectory realistic?

7. The housing trajectory places a particular emphasis on the delivery of certain of the Broad Locations within the next 5 years. This will require those identified to deliver earliest (North St Albans and North West Harpenden, Hemel Hempstead and East St Albans) to be brought forward with alacrity.

8. For North St Albans, and as set out in response to Matter 7, the promoters have entered into a Planning Performance Agreement that intends for an outline planning application to be submitted in spring 2020 and for planning permission to be granted by the end of 2020. Work is well progressed with both the Masterplan and preparation of the outline planning application. On this basis, and allowing for such stages as discharge of planning conditions and reserved matters approval, it is reasonable at this time to expect development to commence in 2022.

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?

9. This is a question for the District Council to answer.

Question 6. Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 73 of the NPPF?

10. The Housing Delivery Test published 19 February 2019 shows St Albans at 58%. This represents a *"significant under delivery of housing in the previous three years"*. Therefore a 20% buffer is considered necessary (see Footnote 39 and Paragraph 73 of the NPPF).

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

11. The stepped trajectory in Policy S4 comprises the following:

- 2020-2025 565 dpa
- 2025-2030 1075dpa
- 2030-2036 1075 dpa

12. To understand the magnitude of this step change it is necessary to look at previous completions, which between 2015/16 and 2019/20 are suggested to be in the region of 400 dpa¹.
13. In effect therefore an increase of some 40% is expected between the current 5-year period (2015-2020) and the first 5-year period of the plan (2020-2025) and then a further 90% increase between that five year period and the next (2025-2030).
14. Within the first 5-year period of the plan, there is an increase in output because, in the first instance, delivery at the North St Albans and North West Harpenden Broad Locations from 2022 onwards and thereafter other Broad Locations.

¹ Housing Delivery Test 2015/16 – 2017/18 and Housing Trajectory 2018/19 – 2019/20

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

15. For the first five years of the plan period (2020-2025) the 5-year housing land supply figure would be

$$565 \times 5 + 20\% = 3390 \text{ dwellings}$$

16. The housing trajectory estimates 3401 dwellings within that 5-year period, suggesting, if all sources of supply perform as intended, and setting aside any question of underprovision from early years, then the 5-year supply requirement would be met.
17. For the two later tranches, the ability to meet the 5-year requirement diminishes. For 2025-2030 the buffer then is achieved is only 10%; whereas for 2030-2035 the supply does not equal the requirement for that 5-year period.

Question 9. On the basis of the Plan as submitted, is it realistic that it would provide for:

a) A supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption?

b) A supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?

If you contend that the Plan would not provide for either (a) or (b) above (or both) could it be appropriately modified to address this?

18. We do not have any comment on this question.

Question 10. In overall terms would the Plan realistically deliver the number of dwellings required over the plan period?

19. We do not have any comment on this question.

Question 11. How have site densities been determined? How rigid are these figures?

20. The density of development for the Broad Locations appear to be based on Annex 1 of the Publication Draft Local Plan which is a calculation based on net development areas. For North St Albans, the work undertaken in respect of the Masterplan illustrates how a range of densities can be provided across the site to achieve an average of 40 dwellings per hectare.

Question 12. What are the targets for the provision of affordable housing? What has been achieved in recent years?

21. Policy L3 specifies that a minimum of 40% affordable homes, as a proportion of the overall dwelling numbers on the site or an equivalent land area, on schemes of 10 or more homes will be required. Corresponding proportions are specified in the individual Policies for Broad Locations.
22. In its 2017 Annual Monitoring Report², the District Council provide a table of the number of affordable homes provided over recent years. Over the time series as a whole (1994/95 to 2016/17) that average proportion was 18%. For the more recent past the percentage is very similar. Only in two years did the time series meet the current 40% requirement.
23. But it should be recognised that there has not been a Development Plan policy more recent than the 1994 Local Plan. Therein Policy 7A does not specify a percentage requirement and merely indicates the District Council will seek to negotiate the provision of affordable housing.

Question 13. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?

24. Policy L1 states that *“all new housing developments will contribute to a mix of different housing types. This includes directly addressing the evidence of local need, while taking into account the existing pattern of development in the area and site-specific factors”*.
25. For each of the Broad Locations *“development is required to provide the specific locally needed housing mix set out in Appendix 6 or as updated by the District Council based on more recent housing needs evidence”*.
26. Appendix 6 of the Publication Draft Local Plan specifies the housing mix, tenure and bedsize for future development which is *“based on previously published Strategic Housing Market Assessment evidence”*.
27. Whilst the most recent SHMA was undertaken in 2016 we are aware that a current assessment is also being prepared that could indicate a different housing mix. On the basis of Policy L1 having a degree of flexibility to allow development at the Broad Locations to reflect more recent evidence than Appendix 6, there appears to be a way in which new and more up to date evidence can be taken in to account.

² AMR002 (Figure 48)

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

25. We do not have any comments on this question.

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