

Matter 8 – The Supply and Delivery of Housing Land

Issue

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

1. 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?

- 1.1 The estimated total supply of new housing in the Plan period is set out in the Local Plan, Appendix 2 – Housing Trajectory under the row heading ‘Trajectory Total’. This sets out the estimated total supply of new housing in the Plan period (2020 to 2036) of 14,871 dwellings. In comparison, the planned level of provision is set out in Local Plan Policy S4 – Housing Strategy and Housing Requirement/Target. This sets out a planned housing requirement/target of 14,608 additional homes over the 16 year period 2020-2036, with an average delivery of 913 dwellings per annum.
- 1.2 The Local Plan housing requirement/target was calculated directly in line with the standard method set out in the PPG on Housing and economic needs assessment, paragraph 004, reference ID: 2a-004-20190220. Paragraph 60 of the NPPF also sets this out as shown below.
60. *To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance...*
- 1.3 The estimated total supply of new housing includes appropriate flexibility and contingency as set out in the NPPF, paragraphs 11 a) and 11 b):
11. *Plans and decisions should apply a presumption in favour of sustainable development.*
- For **plan-making** this means that:*
- a) *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses...*
- 1.4 When the Local Plan was prepared for Publication during the Regulation 19 stage, the draft NPPF 2018 based ‘standard method’ figure at the time was 913 dwellings per annum. This was based on the formula and [‘Housing Need Consultation Data Table’](#) set out under the former Department of Communities and Local Government [‘Planning for the Right Homes in the Right Places: consultation proposals’](#). The consultation for Regulation 19 commenced on 4 September 2018, therefore the approach was to use the 913 dwellings per annum as the District’s overall housing need figure in the Local Plan. On 26 October 2018, the

Government published a document entitled '[Technical consultation on updates to national planning policy and guidance](#)'. This primarily sets out the Government's proposed approach to changing the 'Standard Method' for calculating housing 'need' relating to Local Plan work. The figure for St Albans City and District produced by the proposed methodology at the time was 902 dwellings per annum. Subsequently, with the passage of time, the current 'standard method' figure for comparison is now 896 dwellings per annum (based on the Housing OAN at 28 March 2019). A comparison table was shown in response to Question 9 of the Inspectors Initial Questions ([ED11](#)) and is included at M8Q1 Appendix 1.

- 1.5 Additionally, with the passage of time and therefore updated information and incorporating a small number of minor factual error corrections, an updated draft of Local Plan Appendix 2 with a base date of 1 April 2019 is included at M8Q1 Appendix 2. There is an explanation of the updated approach underpinning the Housing Trajectory 1 April 2019 base date at M8Q1 Appendix 3.
- 1.6 The updated 1 April 2019 Housing Trajectory at M8Q1 Appendix 2 sets out the estimated total supply of new housing in the plan period (2020 to 2036) of 14,974 dwellings (see Trajectory Total). This is compared with the planned housing requirement/target of 14,608 additional homes over the 16 year period 2020-2036, as set out in Local Plan Policy S4.

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

2. Question 2

What is the estimated total supply in the plan period from:

(a) Existing planning permissions?

- 2.1. Based on Local Plan Appendix 2 – Housing Trajectory (1 April 2018 base date), the estimated total supply of housing in the Plan period (2020 to 2036) from existing planning permissions is 908 dwellings. Please see M8Q2 Appendix 1.
- 2.2. Based on the updated Local Plan Appendix 2 – Housing Trajectory (1 April 2019 base date), the estimated total supply of housing in the plan period (2020 to 2036) from existing planning permissions is 1,606 dwellings. Please see M8Q2 Appendix 2.

(b) Other commitments e.g. sites subject to S106 agreements?

- 2.3. Based on Local Plan Appendix 2 – Housing Trajectory (1 April 2018 base date), the estimated total supply of housing in the plan period (2020 to 2036) from other commitments is 217 dwellings. Please see M8Q2 Appendix 1.
- 2.4. Based on the updated Local Plan Appendix 2 – Housing Trajectory (1 April 2019 base date), the estimated total supply of housing in the plan period (2020 to 2036) from other commitments is 5 dwellings. Please see M8Q2 Appendix 2.

(c) Proposed site allocations?

- 2.5. Based on Local Plan Appendix 2 – Housing Trajectory (1 April 2018 base date), the estimated total supply of housing in the plan period (2020 to 2036) from proposed site allocations is 10,085 dwellings. Please see M8Q2 Appendix 1.
- 2.6. Based on the updated Local Plan Appendix 2 – Housing Trajectory (1 April 2019 base date), the estimated total supply of housing in the plan period (2020 to 2036) from proposed site allocations is 10,235 dwellings. Please see M8Q2 Appendix 2.

(d) Other sources

- 2.7. Based on Local Plan Appendix 2 – Housing Trajectory (1st April 2018 baseline), the estimated total supply of housing in the plan period (2020/21 to 2035/36) from other sources is 3,487 dwellings. This figure includes the Unanticipated Delay Factor figures for the pre-plan period. Please see M8Q2 Appendix 1.
- 2.8. Based on the updated Local Plan Appendix 2 – Housing Trajectory (1 April 2019 base date), the estimated total supply of housing in the Plan period (2020 to 2036) from other sources is 3,064 dwellings. This figure includes the Unanticipated Delay Factor figures for the pre-plan period. Please see M8Q2 Appendix 2.
- 2.9. Local Plan Appendix 2 - Housing Trajectory sets out the estimated total supply of new housing in the plan period (2020/21 to 2035/36) of 14,871 dwellings. This is set out in the row labelled 'Estimated Total Supply (Trajectory Total)'. This total supply includes all types of permissions as broken down in sub-questions a), b), c) and d). The estimated total supply figure takes account of unstarted permissions and includes a windfall allowance and an

unanticipated delay factor. Reasonable assumptions have been made including that not all permissions that have been granted will be completed and that some are expected to lapse.

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

3. Question 3

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

- 3.1 Yes, the Council can provide a graph to show the housing trajectory and a clearer, simpler table than that of appendix 2 of the Plan. Based on the Local Plan Appendix 2 – Housing Trajectory, please see provided a graph and data table (supporting the illustrated graph) showing the Housing Trajectory at 1 April 2018 shown in M8Q3 Appendix 1.
- 3.2 Based on the Local Plan Appendix 2 – Housing Trajectory, please see provided a simplified table of the Housing Trajectory at 1 April 2018 shown in M8Q3 Appendix 2. This is based on the categories set out in Matter 8 Question 2 and also includes data for the pre-Plan period.
- 3.3 Additionally, based on the updated 1 April 2019 base date Trajectory set out in response to Matter 8 Question 1, please see provided a graph and data table (supporting the illustrated graph) showing the Housing Trajectory at 1 April 2019 shown in M8Q3 Appendix 3.
- 3.4 Also, based on the updated 1 April 2019 base date Trajectory set out in response to Matter 8 Question 1, please see provided a simplified table of the Housing Trajectory at 1st April 2019 shown in M8Q3 Appendix 4. This is based on the categories set out in Matter 8 Question 2 and also includes data for the pre-Plan period.

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

4. Question 4

Is the housing trajectory realistic?

- 4.1 Yes, the Council believes that it is. This approach taken is in line with the NPPF, including in particular:

16. Plans should: ...

b) be prepared positively, in a way that is aspirational but deliverable;

- 4.2 The NPPF definition of deliverable and developable are defined in Annex 2: Glossary as:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

- 4.3. Other key parts of the NPPF that address what is considered 'realistic' with regard to housing trajectories include:

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.

72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support

of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

...

- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)*

- 4.4. The trajectory illustrates a deliverable and developable approach as set out in the NPPF. The Council has taken a 'realistic' approach. Housing delivery has been important in the district over a long period of time, primarily due to being in an area of high housing demand whilst being wholly washed over by the Metropolitan Green Belt. Deliverability and developability of housing and therefore overall 'realism' has been tested on a considerable number of occasions at planning appeals by public inquiry and also on occasion in the High Court and Court of Appeal. This was set out in part in the Green Belt Topic Paper ([ED25C](#)) at page 21:

PPC - January 2014

PPC January 2014 Report - Housing Land Supply/Urban Capacity Update

Purpose of the report

- 1.1 *To report on the District's current housing land supply position (5 and 20 year) and to examine the supply likely to be available from known and expected urban capacity and other previously developed land over the proposed Plan period to 2031.*

...

Housing projections and dwelling provision requirements

- 5.1 *The Council's housing land supply has been subject to several challenges at Appeal Public Inquiries and Hearings and these have been rigorously examined by various inspectors. All inspectors have supported the Council's approach to land supply overall. In matters of individual site detail, they have either wholly supported the Council's conclusions on every site and every issue or supported nearly all, with a couple of exceptions.*
- 5.2 *As an example, at the most recent Appeal Public Inquiry (Hunston), decision now quashed), the Inspector wholly agreed with the Council's approach to the appropriateness of the 5% buffer, windfalls and completions data. The Inspector also agreed almost all of the sites and capacities comprising the 2,183 dwellings in the Council's trajectory. She considered, however, on balance, that the 50 dwellings within the 5 year period for the Civic Centre Opportunity Site was not sufficiently certain. She also concluded that delivery would be slightly later for the former HSBC site, meaning capacity should be reduced by 45 within the 5 years and that 7 fewer dwellings would be forthcoming on the former Ariston Works site.*
- 5.3 *The Council's approach to housing land supply, including the assumed windfall trajectory, has therefore been thoroughly tested in public by Inspectors at Appeal and is robustly justified.*
- 5.4 *Land supply calculations involve assessing the delivery trajectory from sites under construction, existing planning permissions and expected future development,*

including in the form of Plan broad locations, allocations and predictions for currently unidentified sites.

5.5 Key issues in this include assumptions about and assessment of windfall delivery, the impact of office to residential uses and the residential development of garden land. Legislation and Government guidance on these matters has recently changed and the implications are considered as they affect the housing trajectory.

- 4.5 With regard to recorded and published data in the Authority's Monitoring Report, this consists of annual site surveys, recording completions, removing sites that have lapsed without a material start and reviewing pre-application meetings/discussions and Building Control records. In order for the Council to consider sites as deliverable, on-going monitoring is undertaken and where possible discussions are held with landowners and developers to discuss progress of delivery on each site. To put into context based on the submitted Local Plan (Appendix 2) – Housing Trajectory, this has captured all known sites, including sites granted either planning permission or outline consent as of 1st April 2018, of which the Council considers as deliverable. This is also the case for the updated Trajectory (1 April 2019 base date).

Broad Locations

- 4.6 The Council considers Broad Location sites as developable and has set out its approach in response to the Questions at Matters 6 and 7.
- 4.7 The Council goes further to say that it has overall taken a balanced and relatively cautious approach in particular to the trajectories for the Broad Locations and delivery of dwellings over the Plan period. This is in part due to acknowledged uncertainties as to when the Local Plan will be adopted and the potential for delay to delivery of Broad Locations, particularly in the earliest years after 2020. Conversely, there is considerable potential for some of the Broad Locations to deliver homes more quickly than as currently set out in the Trajectory. This is particularly the case for the North East Harpenden, West of London Colney and West of Chiswell Green Broad Locations which could well be delivered sooner than as currently set out in the Trajectory. As set out in response Matter 6 Question 5, the landowner/developer teams and the Council are already working on Council-led Masterplanning on all the Broad Locations in the Local Plan in advance of the Local Plan being adopted. In particular, for the North East Harpenden, West of London Colney and West of Chiswell Green Broad Locations, the landowner/developer teams are actively taking forward preparatory and technical work for Masterplanning of these sites and are in close contact with the Council.
- 4.8 The Council has set out how the capacity of each Broad Location has been determined and how this contributes to the overall provision in the plan period in response to the Matter 7 S6 i to xi Questions.

Windfall

- 4.9 Historically, the Council's Windfall projections have been realistic. This is shown in past Authority's Monitoring Reports. The Council considers evidence for a windfall allowance generally and specifically one of the scale set out in the Local Plan Appendix 2 – Housing Trajectory (and the updated 1 April 2019 base date Housing Trajectory) is truly compelling and clear. The Methodology to how the Council calculates its projected Windfall is set out at

M8Q4 Appendix 1. This methodology is carried out in accordance with paragraph 67 and 70 of the NPPF and paragraph 023 of the PPG. This is set out below:

67. *Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

...

b) *specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

...

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.*

...

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.

Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance (using the same criteria as set out in paragraph 67 of the National Planning Policy Framework).

Paragraph: 023 Reference ID: 3-023-20190722

Revision date: 22 07 2019

Delivering Urban Optimisation

- 4.10 The Council has also considered other factors such as including sites assessed in the SHLAA that have a reasonable prospect of being developed and also re-developing certain less well-performing employment sites (designated in the [District Local Plan Review 1994](#)) as part of the Urban Optimisation approach.
- 4.11 Based on the submitted Local Plan (Appendix 2) – Housing Trajectory, 880 dwellings are planned to be delivered within the plan period (2020-2036). This has been sourced from re-developing council owned sites and deallocating less well-performing sites designated as Employment allocations in the [District Local Plan Review 1994](#). The rationale behind this approach is set out in response to Matter 5 Question 20, 24 and 25. It is evident from this that the Plan provides for sufficient Employment land to meet demand. This also includes redevelopment in urban areas that can support higher density development as set out in Policy S1 - Spatial Strategy and Settlement Hierarchy. Policies L1 Housing Size, Type, Mix and Density and L8 - Primarily Residential Areas also facilitates this. For reference, the

employment sites not carried forward from the [District Local Plan Review 1994](#) are set out at M8Q4 Appendix 1. This is in accordance with paragraph 120 of the NPPF as set out below:

120. *Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:*
- a) *they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and*
 - b) *in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.*

...

Five year land supply – 20% buffer

- 4.12 The Council's response to Matter 8 Question 6 sets out the relevant buffer of 20%. This has been applied within the first five years of the plan, which includes sites considered as deliverable within this time period based on the available evidence. This is also set out in the NPPF at paragraph 67:

67. *Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

- a) *specific, deliverable sites for years one to five of the plan period³²; and*

...

³² *With an appropriate buffer, as set out in paragraph 73. See glossary for definitions of deliverable and developable.*

- b) *specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

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

5. 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?

- 5.1. Yes, the Council does have a contingency, as set out in response to Matter 8 Question 4. There is considerable potential for some of the Broad Locations to deliver homes more quickly than as currently set out in the Trajectory. This is particularly the case for the North East Harpenden, West of London Colney and West of Chiswell Green Broad Locations which could well be delivered sooner than as currently set out in the Trajectory. As set out elsewhere in other MIQ responses, the landowner/developer teams and the Council are already working on Council-led Masterplanning on all the Broad Locations in the Local Plan in advance of the Local Plan being adopted. In particular, for the North East Harpenden, West of London Colney and West of Chiswell Green Broad Locations, the landowner/developer teams are very actively taking forward preparatory and technical work for Masterplanning of these sites and are in close contact with the Council.
- 5.2. The Council also has a second contingency plan. SADC is committed to an early Plan review as set out in the Plan at 2.7 and as required by the NPPF at paragraph 33 as set out below.
33. *Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary.*
- 5.3. Also, it can be noted that, as set out in part in response to other MIQs and in the Green Belt Topic Paper ([ED25C](#)), the possibility of further contribution to small scale development through allocation of Green Belt green field sites through Neighbourhood Plans. There is also the opportunity for small sites to come forward through Policy L4 - Affordable housing development in the Green Belt (rural exception sites).

6. 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?

- 6.1 Yes, according to the Government's definitions as set out in the NPPF and PPG, there has been persistent under delivery of housing. The Council has therefore used a 20% buffer as set out in the Local Plan (Appendix 2) Housing Trajectory for the first five years of the Plan. The Council has adopted a stepped target approach as set out in answer to Matter 8 Question 7. The Housing Trajectory in the Plan at Appendix 2 shows an average of 680 dwellings per annum against the stepped target of 565 dwelling per annum. This 680 figure includes the 20% buffer for the first five years of the Plan between the periods of 2020-2025. Also included is an updated Trajectory (1 April 2019 base date) that shows an average of 646 dwellings per annum against the indicative updated stepped target of 535 dwellings per annum. This 646 figure includes the 20% buffer for the first five years of the Plan (against the indicative updated stepped target of 535 dwellings per annum) between the periods of 2020-2025. This (1 April 2019 base date) Trajectory is shown again in M8Q6 Appendix 1.
- 6.2 Paragraph 73 of the NPPF 2019 sets out:

Maintaining supply and delivery

73. Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies³⁶, or against their local housing need where the strategic policies are more than five years old³⁷. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

...

- a) 5% to ensure choice and competition in the market for land; or*
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan³⁸, to account for any fluctuations in the market during that year; or*
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply³⁹*

- 6.3 Following publication of the Housing Delivery Test results in February 2019, the Government has required that Local Authority's use this test when applying the appropriate buffer as from November 2018. This is set out in the NPPF at footnote 39:

³⁹ From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

- 6.4. From the Housing Delivery Test: 2018 Measurement results shown in M8Q6 - Appendix 2, the Council scored 58% and therefore has not met the housing delivery target of 95%. As a consequence a buffer of 20% has been applied.

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

7. Question 7

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

- 7.1. Overall, the Council considers that the implications are that the Plan sets out the most appropriate approach to the supply and delivery of housing by using a stepped approach, in the context of this District. By using the stepped approach there is an appropriate balance between delivering as quickly as reasonably possible the very large uplift in homes required in the NPPF by the Government's new 'Standard Method' (circa 250% of long term average delivery in the District of circa 360 pa) and ensuring that there is sufficient lead in time to deliver the required infrastructure; all while being realistic about how quickly large scale developments can reasonably be progressed through Masterplanning and planning application processes and then built out. The Plan sets out a significant change in approach from previous tight Green Belt restraint, since 1994. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall Plan development strategy.
- 7.2. SADC has considered the issue and rationale for using 'stepped' targets and the implications on the supply and delivery of housing on a number of occasions, including most explicitly as set out in the Green Belt Topic Paper ([ED25C](#)) at pages 55-56:

[PPC June 2018 Report - Draft Local Plan for Publication \(Regulation 19 Stage\) Consultation - Recommendation to June Cabinet](#)

...

- 4.6 *Following the approach indicated in the Regulation 18 consultation, the draft LP sets out an approach that is seeking to deliver an average of 913 homes per annum. This meets the Government's proposed 'standard methodology' figure for housing need in full across the LP period 2020-2036. In order to allow realistic time for delivery of the homes and infrastructure, the LP takes a 'stepped' approach to housing targets. This has become common in recent years in adopted Plans and is directly addressed in the Government's current Planning Practice Guidance draft update.*

- 7.3. Pages 69-70:

Representation Point

Plan fails to consider sites that can come forward quickly to help maintain a 5 years supply of deliverable housing sites. Requirement of specific deliverable sites for years 1-5 is not met.

...

Outline Reply Disagree

Recommended Reply (including notes and references)

The Plan necessitates a significant change in approach from previous tight Green Belt restraint. This involves a carefully considered stepped trajectory for delivery of new sites that are best able to deliver to the overall plan development strategy. There are sufficient deliverable sites for years 1-5. This is confirmed in relevant developer representations.

- 7.4. The issue of a stepped housing requirement for plan-making is set out at Paragraph 021 of the PPG:

When is a stepped housing requirement appropriate for plan-making?

A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.

Where there is evidence to support a prioritisation of sites, local authorities may wish to identify priority sites which can be delivered earlier in the plan period, such as those on brownfield land and where there is supporting infrastructure in place e.g. transport hubs. These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement.

Paragraph: 021 Reference ID: 68-021-20190722

Revision date: 22 July 2019

- 7.5. The appropriate approach to a stepped housing requirement for calculating 5 year land supply is set out at Paragraph 026 of the PPG:

How is 5 year housing land supply measured where authorities have stepped rather than annual average requirements?

Five year land supply is measured across the plan period against the specific stepped requirements for the particular 5 year period.

Paragraph: 026 Reference ID: 68-026-20190722

Revision date: 22 July 2019

- 7.6. The Council considers that its approach accords fully with the approach set out in the PPG.

8. Question 8

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

- 8.1 The Council considers that there will overall be a very positive impact on the 5 year supply of deliverable housing land and the delivery of affordable housing. This is clearly set out in the Plan at Appendix 2 (1 April 2018 base date) and the updated draft Appendix 2 (1 April 2019 base date). As can be seen, if the new Plan is adopted relatively shortly, this will over the 5 years between the period 2020-2025 alone deliver 3,400 dwellings in total, which includes an additional 1,220 dwellings on the new Broad Locations, based on the Plan at Appendix 2 (1 April 2018 base date). Based on the new draft updated Trajectory (1 April 2019 base date), if the new Plan is adopted relatively shortly, this will over the 5 years between the period 2020-2025 alone deliver 3,229 dwellings in total, which includes an additional 1,220 dwellings on the new Broad Locations. As can be seen, if the new Plan is adopted relatively shortly, this will over the 5 years between the periods 2020-2025 alone deliver an additional 488 Affordable Homes on the new Broad Locations. This is based on the Plan set out at Appendix 2 (1 April 2018 base date) applying the target of 40% affordable homes (as a minimum). Also, based on the new draft updated Trajectory (1 April 2019 base date) if the new Plan is adopted relatively shortly, this will over the 5 years between the periods 2020-2025 alone deliver an additional 488 Affordable Homes on the new Broad Locations.
- 8.2 If the new Plan is adopted, there will also likely be significant number of additional Affordable Homes through the application of Policy L3 - Provision of and Financial Contributions towards Affordable Housing. This Policy will be applied against future sites due to come forward through Urban Optimisation and Neighbourhood Plan site allocations. This new approach increases the requirement and delivery of affordable housing from the current 35% (via the [District Local Plan Review 1994](#)) to 40%. Further to this, the policy reduces the threshold for provision of Affordable Housing, which will therefore increase its supply.
- 8.3. It can be noted that the long term delivery of Affordable Housing is approximately 70 dwellings per annum. The Policies set out in the Plan will facilitate a very significant uplift in both the supply of deliverable housing land and the delivery of Affordable Housing.

9. 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?

9.1 Yes, the Council considers that, when taking the stepped approach set out in the Local Plan Appendix 2 – Housing Trajectory (1 April 2018 base date) the Plan will realistically provide a supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption, as set out in the NPPF/PPG. The relevant housing requirement is 565 dwellings per annum and a total of 2,825 ‘deliverable’ homes in the first 5 years. The Housing Trajectory at Local Plan Appendix 2 shows 2,180 dwellings to be delivered, plus 1,220 from the new Broad Locations within the first 5 years of the Plan. For the avoidance of doubt, the Council considers that it is realistic, in the context of this District, that all of these 3,400 homes meet the test of being ‘deliverable’. This is also the case when compared with the updated 1 April 2019 base date Trajectory. The relevant housing requirement there is 535 dwellings per annum and a total of 2,675 ‘deliverable’ homes in the first 5 years. The Housing Trajectory at Local Plan Appendix 2 shows 2,009 dwellings to be delivered, plus 1,220 from the new Broad Locations within the first 5 years of the Plan. For the avoidance of doubt, the Council considers that it is realistic, in the context of this District, that all of these 3,229 homes meet the test of being ‘deliverable’.

9.2 The NPPF defines ‘deliverable’ as:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

9.3 Paragraph 007 of the PPG sets out the requirements to consider a site as ‘deliverable’. This is shown below:

What constitutes a ‘deliverable’ housing site in the context of plan-making and decision-taking?

In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning

decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;
- are allocated in a development plan;
- have a grant of permission in principle; or
- are identified on a brownfield register.

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites.

Paragraph: 007 Reference ID: 68-007-20190722

Revision date: 22 July 2019

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

- 9.4 Yes, the Council considers that, when taking the stepped approach set out in the Local Plan Appendix 2 – Housing Trajectory (1 April 2018 base date) the Plan will realistically provide a supply of specific developable sites (including new Broad Locations) to meet the housing requirement for years 6-10 from the point of adoption, as set out in the NPPF/PPG. The relevant housing requirement is 1,075 dwellings per annum and a total of 5,375 'developable' homes in years 6-10 of the Plan. The Housing Trajectory at Local Plan Appendix 2 shows 1,196 dwellings to be developed, plus 4,810 from the new Broad Locations in years 6-10 of the Plan. For the avoidance of doubt, the Council considers that it is realistic, in the context of this District, that all of these 6,006 homes meet the test of being 'developable'. This is also the case when compared with the updated 1 April 2019 base date Trajectory. The relevant housing requirement there is 1,085 dwellings per annum and a total of 5,425 'developable' homes in years 6-10 of the Plan. The Housing Trajectory at Local Plan Appendix 2 shows 1,320 dwellings to be developed, plus 4,810 from the new Broad Locations in years 6-10 of the Plan. For the avoidance of doubt, the Council considers that it is realistic, in the context of this District, that all of these 6,130 homes meet the test of being 'developable'.

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?

- 9.5 No, the Council considers that it has set out in its response to the questions above (and in the underlying evidence to other Matter 8 Questions) that the Plan provides for a supply of deliverable and developable sites to meet the housing requirements during the Plan period. For the avoidance of doubt, the Council is open to making necessary modifications to the Housing Trajectory in order to make it sound, if the Examination process indicates that this is required.

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

10. Question 10

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

- 10.1 Yes, the Council considers that the Plan will realistically deliver the number of dwellings required over the Plan period. This is based on the responses set out in answer to the previous Questions in Matter 8, based on the Local Plan Housing Trajectory (1 April 2018 base date) and the updated Local Plan Housing Trajectory (1 April 2019 base date).

11. Question 11

How have site densities been determined? How rigid are these figures?

- 11.1. The site densities have been determined through interrogation at Planning Policy Committee (PPC) on several occasions. Most recently in the [March 2019 PPC](#) and Cabinet there was consideration of the evidence, including that set out in the Plan Annex 1 and the assumptions regarding density set out therein. This is reflected in the Plan Regulation 22C statement. This discussion at PPC over time has focussed on an evidential basis set out initially in the Homes and Communities Agency Urban Design Compendium and the independent SKM Green Belt Review. Overall 60% of the Gross Development Area (GDA) would be developed (termed Net Development Area) and the remaining 40% would be required to provide infrastructure, main roads, open space and public facilities. On the 60% Net Development Area, 40 dwellings per hectare (dph) has been applied. Both the 60/40 split and the 40 dph figure are considered to be well-evidenced and a sound starting point. In the context of making best use of land, as set out in the NPPF, and a District wholly washed over by the Green Belt, a minimum of 40 dwellings per hectare on the net area in Broad Locations is considered necessary to avoid inefficient use of land. The figures are not rigid and indeed the Council's considerations explicitly set out that a variety of densities both within sites and between sites is positively to be expected.
- 11.2. In more detail, the Plan sets out a minimum overall density of 40 dwellings per hectare for each Broad Location set out in Policy L1 - Housing Size, Type, Mix and Density and Policy S6 i to xi. This will be monitored through the Monitoring Framework at Appendix 3.
- 11.3. The Council carried out an extensive work through various PPC discussions. The outcome of these discussions led to the decision to deliver the Broad Locations using an overall density of 40 dwellings per hectare on the net developable area. The relevant PPC discussions (from the earliest to most recent) which lead up to this decision is shown below.
- 11.4. The PPC of [31 January 2014](#) titled Strategic Local Plan - Development Strategy Options established the 40 dwellings per hectare as a 'safe' approach to maximise efficient use of land. This was based on achieving the housing/requirement targets at the time for the emerging Strategic Local Plan. This is set out below:

5.6 ...It is considered that 40dph is a relatively 'safe', robust assumption which can be readily achieved in suburban location housing developments in the District...

...

5.7 Appendix 1 provides a summary of the "Strategic" Green Belt land releases as recommended by SKM. For these areas SKM identified potential development parcels and calculated a dwelling capacity range based on net densities of 30 – 50dph. It is recommended that Plan policies are developed on the basis of achieving a mid-range overall target minimum density of 40dph. This will necessitate some higher suburban density forms of development in some locations...

- 11.5. The PPC of [July 2014](#) at the time was set out to allow the Committee to consider the outcome of the Strategic Local Plan (SLP) development site and strategy options evaluation and to reach a view on the way forward for the content of a revised draft SLP. Again, the approach of 40 dwellings per hectare was considered as part of the recommendation.

5.6 Overall the evaluation results in a recommendation that the Committee agree the following points as a basis for preparation of the revised SLP (in the form of a preferred draft Plan for consultation – for more details on consultation see Conclusion below):

...

...the assumption of 40 dwellings per hectare is important. This is a relatively modest average, net, density in new housing development and should be readily achievable. In reality densities will vary in different parts of a major development...

- 11.6. Appendix 6 titled Strategic Local Plan Background Note: Residential Density that was included as part of the PPC in [July 2014](#). The draft was updated and can be found at [HOU 015 SLP Background Note Residential Density](#). This was presented to PPC to set out the following:

The first part of the Note illustrates how density is viewed at a gross level. It gives examples of the relationship between gross and net density calculations. Gross density calculations can be used to estimate and illustrate the potential development capacity of a site. The Green Belt Review Part 2 (SKM Enviro Consultancy Study) used the approach that up to 60% of the Gross Development Area (GDA) would be developed (termed Net Development Area) and the remaining 40% would be required to provide infrastructure, main roads, open space and public facilities. The second part of the Note illustrates calculations of net density. A net density measurement includes access roads within the site, private garden spaces, car parking areas, incidental open space and landscape and children's play areas but normally excludes major distributor road, primary schools, open spaces serving a wider area and significant landscape buffer strips.

Net density is the measure of density used for the SKM recommended net development areas and thus is a comparable measure to that used in the illustrations in this Note.

Work on density assumptions in the draft Strategic Local Plan (SLP) is based on HCA research, in the form of a density matrix (Table 3.3 from the Homes and Communities Agency Urban Design Compendium – reference below). The matrix links typical residential densities to urban form ('creating urban structure'). It draws on examples of development across the UK and Europe. Average densities are based on case studies analysed as part of the Sustainable Residential Quality: Exploring the housing potential of large sites research. The matrix recommends that residential densities of 30 to 50 DPH (alongside related services) should be applied in suburban locations. This is considered to be relevant to the SKM identified sub areas assessed for the draft SLP, as they are located on the edges of existing settlements and exhibit suburban characteristics.

- 11.7. The Green Belt Topic Paper ([ED25C](#)) in response to Inspectors letter to Council of 2 July 2019, at section 2 sets out the site selection process for the Broad Locations and includes the following documents submitted as part of the Local Plans evidence.

- SKM Green Belt Review 2014
- SHLAA 2018
- Strategic Site Selection 2018.

1.1.8 “As set out in response to Matter 1 above, consultants SKM on behalf of the Council undertook the Green Belt Review work identified in documents [GB0001-GB0004](#). This provided the foundation in identifying which Green Belt strategic scale sites least met the purposes of the Green Belt and could be considered to meet development need and be removed from the Green Belt.

1.19 The work identified above for Step 1 ‘a thorough investigation of the capacity of the existing urban areas (suitable brownfield sites and underutilised land) and whether this has been maximised having regard to optimising densities’ showed a significant shortfall against the Government’s ‘Standard methodology’ figure of 913 homes per annum. This shortfall could not be met even by including all 9 sites identified in the Green Belt Review Sites and Boundaries Study for St Albans (February 2014) [\(GB001\)](#). *In determining the capacity of the 8 SKM- identified sites for housing, a net density of 40dph was applied which was higher than historic rate to ensure best use of land.* For all 8 Green Belt strategic housing sites this gave a total capacity of circa 6,000 homes. When combined with the total non-Green Belt green field capacity previously identified as also circa 5,000 homes, this circa 11,000 total was clearly far short of the 14,608 homes set out by the Government’s ‘standard methodology’ for housing ‘need’.

1.20 As also set out above in response to Matter 1, this work resulted in the 8 strategic sub-areas considered in the Green Belt Review Sites and Boundaries Study for St Albans (February 2014) [\(GB001\)](#) being judged as 8 ‘Green’ (low impact) rated sites (the ninth site being the wholly employment providing site at East Hemel Central) and four additional ‘Amber’ (medium impact) rated sites. When reviewing the non GB capacity in more detail (LP Appendix 2), all 8 of the ‘Green’ and three of the four ‘Amber’ sites were required to meet the ‘standard methodology’ figures for housing ‘need’. The advantages of the three selected ‘Amber’ sites were considered by PPC to be greater than that for the non-selected fourth site.

1.21 For the avoidance of doubt, based on the approach taken above, as all 9 sites (8 residential) identified in the Green Belt Review Sites and Boundaries Study for St Albans (February 2014) [\(GB001\)](#) were ranked as ‘Green’ (low impact), then their ranking in three tiers was ultimately not considered relevant.”

11.8. The 40 dwellings per hectare is a reasonable medium to meet the requirements set out in the NPPF at paragraph 123 a) below:

...

a) *Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*

11.9. Other parts of the plan area have been considered and is set out in Policy S1 – Spatial Strategy and Settlement Hierarchy. Higher densities are encouraged in Category 1 settlements - City, Towns and Main urban settlements excluded from the Green Belt. Lower densities are required in categories 2, 3 and 4. Overall, certain criteria is set out in Policy L1 - Housing Size, Type, Mix and Density. All new housing will be developed at a density that is

consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area in which it is situated. Higher density development, including buildings of greater height than existing, will be encouraged, particularly in accessible urban locations with good access to services. Development proposals that fail to make efficient use of land for housing, having appropriate regard to local character and site-specific factors, will be refused permission. These Policies meet the requirement as set out in the NPPF at paragraph 123 b) and PPG guidance on 'Effective use of land'. NPPF paragraph 123 b) is shown below:

- ...
- b) *the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range*

11.10. Paragraph 004 of the PPG sets out the following measures that should be use when determining housing densities:

What tools are available to local planning authorities to help identify appropriate densities?

- ...
- ...Tools that can assist with this include:*
- *accessibility measures such as distances and travel times to key facilities, including public transport stops or hubs (and taking into consideration service capacity and frequencies and destinations served). A range of tools are available to support such assessments.*
 - *characterisation studies and design strategies, dealing with issues such as urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure and amenity space;*
 - *environmental and infrastructure assessments, such as the capacity of services and presence of environmental risks (e.g. flood risks or overheating), and the opportunities to address these; and*
 - *assessments of market or site viability."*

Paragraph: 004 Reference ID: 66-004-20190722
Revision date: 22 07 2019

11.11. The District is required to provide 14,871 dwellings. To provide this number across the most suitable broad locations, a minimal overall density of 40dph has been adopted.

12. Question 12

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

12.1. [i] Overall, the Plan sets out a % target for provision on sites and requirements for financial contributions from sites with a dwelling capacity of 1-4 dwellings. The % target provision for affordable housing is 40% and is set out in the Local Plan at Policy L3 - Provision of and Financial Contributions towards Affordable Housing. This is broken down in the table set out under the heading 'Affordable housing type requirements'. Out of the 40% total, 30% will be Affordable Housing for Rent – 'Social Rent', 30% will be Affordable Housing For Rent – 'Affordable Rent' and 40% will be Subsidised Home Ownership types – including (for example) Shared Ownership, Starter Homes, Discounted Market Sales. The percentage targets will be monitored against the Monitoring Framework set out in Appendix 3 of the Local Plan. For the avoidance of doubt, the Plan does not set out a numerical target for the provision of affordable housing.

12.2. It is noted that paragraph 64 of the NPPF sets out the affordable home ownership requirement for major developments at paragraph 64, which is considered to be accorded with:

64. *Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for*

...

affordable home ownership²⁹...

...

²⁹ *As part of the overall affordable housing contribution from the site.*

12.3. The NPPF at Annex 2: Glossary sets out the definition for Affordable housing as:

Affordable housing: *housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:*

- a) **Affordable housing for rent:** *meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*

- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

- 12.4. [ii] The long term historic average has been approximately 70 Affordable Homes per annum. This is set out at M8Q12 Appendix 1. The Policies set out in the Plan will facilitate an uplift in affordable housing completions per annum.
- 12.5. The Local Plan Appendix 3 – Monitoring Framework sets out a percentage requirement of affordable housing completions by type split between 30% social rent / 30% affordable rent / 40% subsidised ownership. Once the new Plan is adopted, the new Broad Locations will enable a step-change in the amount of delivery of Affordable Housing. As above, this will be monitored against the targets set out on the Monitoring Framework and in accordance with the Plan at Policy L3.

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

13. Question 13

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

- 13.1. Yes, the Council considers the type and size of housing planned is likely to meet the needs of the area. This is primarily as set out in Policy L1 - Housing Size, Type, Mix and Density and Appendix 6 of the LP. In these two places the Council sets out the main evidence sources, overall approach and context. Policy L1 sets out:

Policy L1 - Housing Size, Type, Mix and Density

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.

Mix, type and size will be judged comprehensively and not just on bedroom numbers in isolation. Where necessary to ensure policy aims are achieved, this will include an assessment of overall dwelling size, proposed bedroom numbers and numbers of habitable 'non-bedroom' rooms.

Development at the Broad Locations is required to provide the specific locally needed mix of housing set out in Appendix 6 or as updated by SADC based on more recent housing needs evidence.

The provision of first-time buyer (1-2 bed) flats, first family homes (2-3 bed houses) and opportunities for downsizers are particularly encouraged.

The affordable housing size, type, and mix must reflect that being provided for the market element of all development.

All new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area in which it is situated. Higher density development, including buildings of greater height than existing, will be encouraged, particularly in accessible urban locations with good access to services.

Development proposals that fail to make efficient use of land for housing, having appropriate regard to local character and site-specific factors, will be refused permission.

In Broad Locations a minimum average net density of 40 dwellings per hectare is required.

- 13.2. LP Appendix 6 sets out:

Housing Mix, Tenure and Bedsize

<i>Tenure</i>	<i>1 Bed</i>	<i>2 Bed</i>	<i>3 Bed</i>	<i>4+ Bed</i>
<i>Affordable Rent</i>	14%	22%	57%	7%
<i>Social Rent</i>	14%	22%	57%	7%
<i>Subsidised Home Ownership</i>	14%	22%	57%	7%
<i>Market Housing</i>	14%	22%	57%	7%
<i>All Sectors</i>	14%	22%	57%	7%

The Table is based on previously published Strategic Housing Market Assessment (SHMA) evidence (both for SADC and the South West Hertfordshire area). These are available on our 'library of documents' on our website and have been for some time. Specifically, this Appendix 6 translates the SHMA Update 2015 table 4.5 directly in terms of bedsize split. Please see the relevant parts of that table reproduced below:

Tenure	Sector	1 bed	2 bed	3 bed	4+ bed	Total No.
Total %	All sectors	14.1	22.0	57.2	6.8	100

As is very common in SHMAs, they show considerably greater need for Affordable housing than Market housing in the District. In this case, the same table shows more than 75% of all housing need in the District is for Affordable homes and less than 25% for Market homes. The Council, similarly to almost all, has had to take a view on balancing seeking to meet the identified needs most closely and what is actually deliverable through the planning system. A 75% Affordable and 25% Market split has no reasonable prospect of being delivered. The balance has been addressed through policies in the draft Local Plan, including most specifically L1, L2, L3 and Appendix 6.

Whilst the Council does expect to undertake further housing need/SHMA work, this will be primarily targeted at understanding the long term demographic and housing market / affordability implications of achieving a Plan (dwelling numbers) requirement / target that is now separately determined by the Government's revised NPPF 'standard Methodology'. This new housing need/SHMA work will not alter the basic evidence of need that arises from official population/household projections. The Council will see if translating that evidence into deliverable Plan policy would result in different approaches in due course, but given the fundamental underlying evidence over many years, that is very unlikely to fundamentally change prior to the issue being addressed at the Examination in Public.

- 13.3. In light of the emerging new 'standard method' and the approach in the new NPPF in July 2018, the Council and all the 5 South West Herts LPAs commissioned a new South West Hertfordshire Local Housing Needs Assessment. Because of a variety of issues that have arisen, this work has taken longer than originally envisaged and is yet to be completed. As set out in policy L1 and Appendix 6, exact figures from these types of studies will vary in detail over time. The overall thrust of the evidence in terms of the priority of need to provide more first-time buyer (1-2 bed) flats, first family homes (2-3 bed houses) and opportunities for downsizers has been consistent in all similar studies over many years and is not considered likely to change.
- 13.4. The type and size of specialist housing for older people, housing for adults with special needs and housing for Gypsy and Traveller communities have been responded to under other MIQs.

14. Question 14

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

- 14.1 Yes, the Council considers that a sufficient variety of sites in terms of the location and type of sites has been selected. As set out in detail in response to other MIQs, a specific methodology, based on the independent Green Belt review, has been followed. This process has helpfully delivered a considerable variety of locations and types of sites, allocated as the Broad Locations.
- 14.2 With regard to a variety of locations, as can be seen in the Plan Figure 1 'Key Diagram', there is a wide geographic spread of sites. This spread includes variety in terms of the North, Central and South of the District; and the West, Central and East of the District. There is variety in terms of development closely related to a geographically wide range of different existing settlements across the District and in a new settlement at Park Street Garden Village.
- 14.3 With regard to a variety of types of sites, as can be seen in the Plan Figure 1 'Key Diagram', there is a wide type of site in terms of the scale of the Broad Locations and also the scale of the settlements they will form part of. This differential type of scale varies from relatively smaller Broad Locations of 365 and 440 homes at West of Chiswell Green and West of London Colney respectively; to relatively medium sized Broad Locations at North and East of St Albans of 1,100 and 1,250 homes respectively; to relatively larger at Park Street Garden Village and East and North Hemel at 2,300 and a cumulative 5,500 homes respectively. East and North Hemel will also form part of the wider cross-boundary circa 11,000 homes though Hemel Garden Communities. The wide variety of type of settlement to which the Broad Locations will add, varies from the relatively smaller at Chiswell Green (village location) to the relatively medium sized at Harpenden (town location) to the relatively larger at St Albans and Hemel Hempstead (city / large town).

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

Matter 8 – The Supply and Delivery of Housing Land

List of Appendices

M8Q1 – Appendix 1 – Extract from Question 9 of the Inspectors Initial Questions (ED11)	1
M8Q1 – Appendix 2 – 1 April 2019 Housing Trajectory update	2
M8Q1 – Appendix 3 – Explanatory note of 1 April 2019 Housing Trajectory update	3
M8Q2 – Appendix 1 – Simplified Housing Trajectory 1 April 2018 for Plan Period 2020-2036.....	5
M8Q2 – Appendix 2 – Simplified Housing Trajectory 1 April 2019 for Plan Period 2020-2036.....	6
M8Q3 – Appendix 1 – Graph of Local Plan Appendix 2 – Housing Trajectory 1 April 2018 ..	7
M8Q3 – Appendix 2 – Simplified Housing Trajectory 1 April 2018	9
M8Q3 – Appendix 3 – Graph of Local Plan Appendix 2 – Housing Trajectory 1 April 2019	10
M8Q3 – Appendix 4 - Simplified Housing Trajectory 1 April 2019	12
M8Q4 – Appendix 1 – Explanatory note for Windfall, Unanticipated Delay Factor and NPPF Delivering Urban Optimisation	13
M8Q6 – Appendix 1 - 1 April 2019 Housing Trajectory update	17
M8Q6 – Appendix 2 - Extract from Housing Delivery Test: 2018 measurement	18
M8Q12 – Appendix 1 – Historic rates of Affordable Housing completions since 2000	19

St Albans Housing OAN (September 2017*) – 2016 base date

Households 2016	Households 2026	Total Change (2016-2026)	Average Annual Change	Affordability Ratio 2016	Uplift	Adjustment Factor	OAN Uncapped (dpa)	OAN Capped (40% Cap) (dpa)
59,043	65,565	6,522	652	16.76	80%	180%	1,172	913

*17th March 2017 Housing affordability ratio data release date

NB: 2016 as the base date for the ten year household projections (2014-based) period (2016 to 2026) and the 2016 affordability ratio.

St Albans Housing OAN (26th April 2018)

Households 2018	Households 2028	Total Change (2018-2028)	Average Annual Change	Affordability Ratio 2017	Uplift	Adjustment Factor	OAN Uncapped (dpa)	OAN Capped (40% Cap) (dpa)
60,383	66,827	6,444	644	16.59	79%	179%	1,151	902

NB: the base date for the ten year household projections (2014-based) period was 2018 (2018 to 2028) using the 2017 affordability ratio.

St Albans Housing OAN (28th March 2019)

Households 2019	Households 2029	Total Change (2019-2029)	Average Annual Change	Affordability Ratio 2018	Uplift	Adjustment Factor	OAN Uncapped (dpa)	OAN Capped (40% Cap) (dpa)
61,063	67,462	6,399	640	16.81	80%	180%	1,152	896

NB: the base date for the ten year household projections (2014-based) period was 2019 (2019 to 2029) using the 2018 affordability ratio.

HOUSING TRAJECTORY: St Albans District Council 1 April 2019

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	1,264	1,268	1,295	1,200	1,135	1,060	920	860	845	795	14,974	1,760

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

							646					1,226						936	936
NB: Housing Requirement/Target - inc. 20% buffer for 2020-2025 and remainder averaged over 2025-2036																			
							535					1,085						1,085	913

Explanation of the updated approach underpinning the Housing Trajectory 1 April 2019 base date, as at M8Q1 Appendix 2

M8Q1 Appendix 3 sets out the Council's approach to the updated Housing Trajectory 1 April 2019 base date (M8Q1 Appendix 2). It outlines the updates included from the Local Plan Appendix 2 – Housing Trajectory 1 April 2018 base date.

Minor factual error corrections

Minor factual errors in Local Plan Appendix 2 – Housing Trajectory have been corrected in the updated Housing Trajectory 1 April 2019 base date and highlighted in green.

- 1,600 dwellings to be delivered in East Hemel Hempstead (North) Broad Location during the plan period, has been corrected to 1,650 dwellings included in Proposal 2 of Local Plan Policy S6 i.
- 1,000 dwellings to be delivered in North St Albans Broad Location during the plan period, has been corrected to 1,100 dwellings included in Proposal 2 of Local Plan Policy S6 vi.
- 1,000 dwellings to be delivered in North Hemel Hempstead Broad Location post plan period (beyond 2036), has been corrected to 925 dwellings. This post plan figure is the difference between the total delivery of 575 dwellings during the plan period and the minimum capacity of 1,500 dwellings included in Proposal 2 of Local Plan Policy S6 iv.
- The post plan total has been updated to 1,760 dwellings to reflect the corrections above.
- A duplicate 'Council Owned Sites' row below 'Office to Residential Prior Approval 10% discount' and above 'Unanticipated delay factor' was included in error. This row has been removed from the 1 April 2019 baseline Trajectory.

Updated approach to student accommodation and housing for older people (C2 Use Class)

The Government published updated PPG guidance on 'Housing for older and disabled people' on 26 June 2019 (Paragraph: 007 Reference ID: 63-007-20190626 and Paragraph: 016a Reference ID: 63-016a-20190626). Additional updates to the PPG on 'Housing supply and delivery' were published on 22 July 2019 (Paragraph: 034 Reference ID: 68-034-20190722 and Paragraph: 035 Reference ID: 68-035-20190722). With reference to the PPG updates above, the Council has included all student accommodation and housing provided for older people (including care homes and residential institutions) in Use Class C2, as part of the housing land supply in the 1 April 2019 baseline Housing Trajectory.

Windfall Allowance

The 'Windfall Allowance' row has been updated, following the same approach underpinning Local Plan Appendix 2 – Housing Trajectory 1 April 2018 baseline.

Unanticipated Delay Factor

The 'Unanticipated Delay Factor' row has been updated, following the same approach underpinning Local Plan Appendix 2 – Housing Trajectory 1 April 2018 baseline.

Other Updates

There has been significant passage of time between the publication of the Draft Local Plan for Consultation at Regulation 19 stage in September 2018, the submission of the Local Plan to the Planning Inspectorate for Examination in March 2019 and the commencement of the Local Plan Examination hearing sessions in January 2020. Due to the passage of time, the estimated date of adoption for the Local Plan is likely to be moved back beyond Spring 2020. Consequently, it is considered appropriate to move the Local Plan / NPPF Policies - Delivering Urban Optimisation categories back by one year to start from 2026/27 instead of 2025/26.

For the 'Local Plan / NPPF Policies - Delivering Urban Optimisation' sub-categories of 'Intensification / Conversion of Employment Land', 'Council Owned Sites' and 'Increased Density in Higher Buildings', a total of 80 dwellings for the period 2025/26 has been removed. This results in a change to the total for 'Local Plan / NPPF Policies - Delivering Urban Optimisation' during the plan period, resulting in a new total figure of 800 dwellings, which is highlighted in green. This is an update to the previous total of 880 dwellings in Local Plan Appendix 2 – Housing Trajectory 1 April 2018 baseline.

HOUSING TRAJECTORY: St Albans District Council 1 April 2018 (Indicative Draft)

NB: Estimated Total Supply (Trajectory Total) figure of 14,871 dwellings includes total figure of +174 dwellings for row heading 'Unanticipated Delay Factor' allocated in the plan period (years 2020/21 to 2035/36)

M8Q2 Appendix 2

HOUSING TRAJECTORY: St Albans District Council 1 April 2019

		Land Supply - To 1 April																	
Source		Plan Period																	
a) Existing planning permissions		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)	Under construction	259	178	135	126	147	10	0	0	0	0	0	0	0	0	0	0	855	
	With planning permission (full or reserved matters covering whole site)	11	72	187	65	62	31	27	0	0	0	0	0	0	0	0	0	455	
	Small Sites with permission*	62	59															121	
	Conversions with permission*	55	35															90	
	With outline permission with part(s) covered by reserved matters																	0	
	Outline only	0	8	-2	16	10	10	0	0	0	0	0	0	0	0	0	0	42	
	Office to Residential Prior Approval (10% discount**)	5	0	38	0	0	0	0	0	0	0	0	0	0	0	0	0	43	
	Total	392	352	358	207	219	51	27	0	0	0	0	0	0	0	0	0	1,606	

*90% assumption on unstated permissions **10% discount on unstated permissions

		Land Supply - To 1 April																	
Source		Plan Period																	
b) Other commitments		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)	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	
	Garage Sites Program	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	
	Total	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	

		Land Supply - To 1 April																	
Source		Plan Period																	
c) Proposed site allocations		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	Post plan
Local Plan - Broad Locations	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	55								580	
	East St Albans (902 + 348 already permitted)				75	100	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	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)							80	150	180	180	180	180	180	180	180	180	1,670	630
	Total			150	420	650	805	960	1,030	1,050	965	900	825	685	625	610	560	10,235	1,760

		Land Supply - To 1 April																	
Source		Plan Period																	
d) Other sources		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)	With application submitted	-24	20	27	28	53	49	40	0	0	0	0	0	0	0	0	0	193	
	With pre-application discussions occurring	6	0	3	24	14	7	10	10	10	0	0	0	0	0	0	0	84	
	Allocation only	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	10	30	0	0	0	0	0	0	0	0	0	0	40	
	Windfall Allowance	92	105	111	123	123	123	123	123	123	123	123	123	123	123	123	123	1,907	
Local Plan / NPPF Policies - Delivering Urban Optimisation	Unanticipated delay factor***	-65	-65	-65	-65	0	20	24	25	32	32	32	32	32	32	32	32	0	
	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		9	60	76	121	211	247	277	238	245	235	235	235	235	235	235	235	3,064	

***Unanticipated delay factor on unstated permissions

		Land Supply - To 1 April																	
All Sources - Estimated Total Supply		Plan Period																Total	
		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		
a) Existing Planning Permissions		392	352	358	207	219	51	27	0	0	0	0	0	0	0	0	0	1,606	
b) Other Commitments		5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	
c) Proposed site allocations		0	0	150	420	650	805	960	1,030	1,050	965	900	825	685	625	610	560	10,235	
d) Other sources		9	60	76	121	211	247	277	238	245	235	235	235	235	235	235	235	3,064	
Estimated Total Supply (Trajectory Total)		407	411	584	748	1,080	1,103	1,264	1,268	1,295	1,200	1,135	1,060	920	860	845	795	14,974	

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

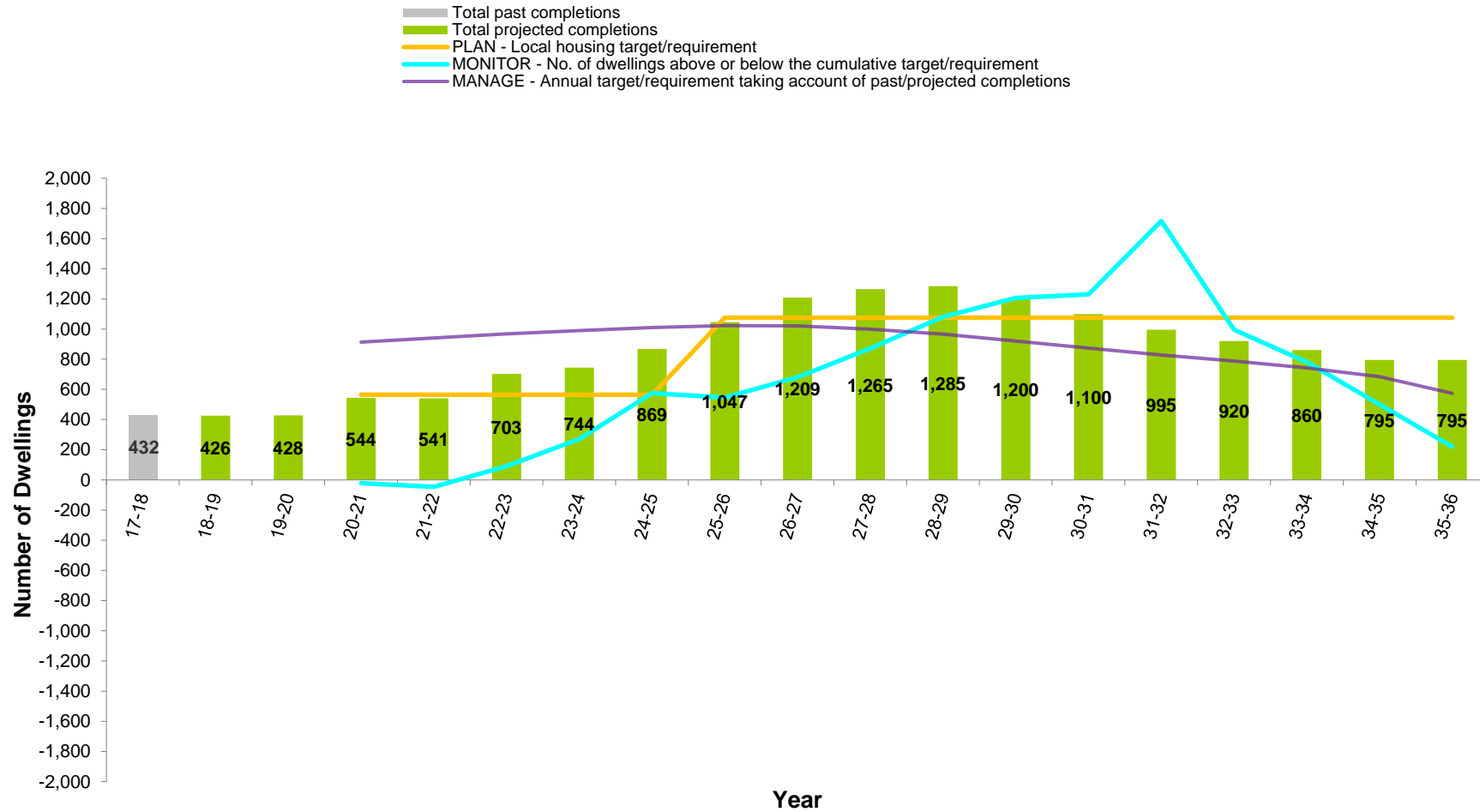
					646						1,226						936	936	
NB: Housing Requirement/Target - inc. 20% buffer for 2020-2025 and remainder averaged over 2025-2036					535						1,085						1,085	913	

NB: Row heading 'Unanticipated Delay Factor' includes figures (total of -65 dwellings) allocated in the pre-plan period (years 2018/19 to 2019/20) to result in overall total figure of 0 dwellings by the end of the plan period (year 2035/36)

NB: Estimated Total Supply (Trajectory Total) figure of 14,974 dwellings includes total figure of +65 dwellings for row heading 'Unanticipated Delay Factor' allocated in the plan period (years 2020/21 to 2035/36)

M8Q3 Appendix 1: Graph of Local Plan Appendix 2 - Housing Trajectory

Appendix 2 - Housing Trajectory: St Albans District Council 1 April 2018 (Indicative Draft)



Housing Trajectory: St Albans District Council 1 April 2018 (Indicative Draft)

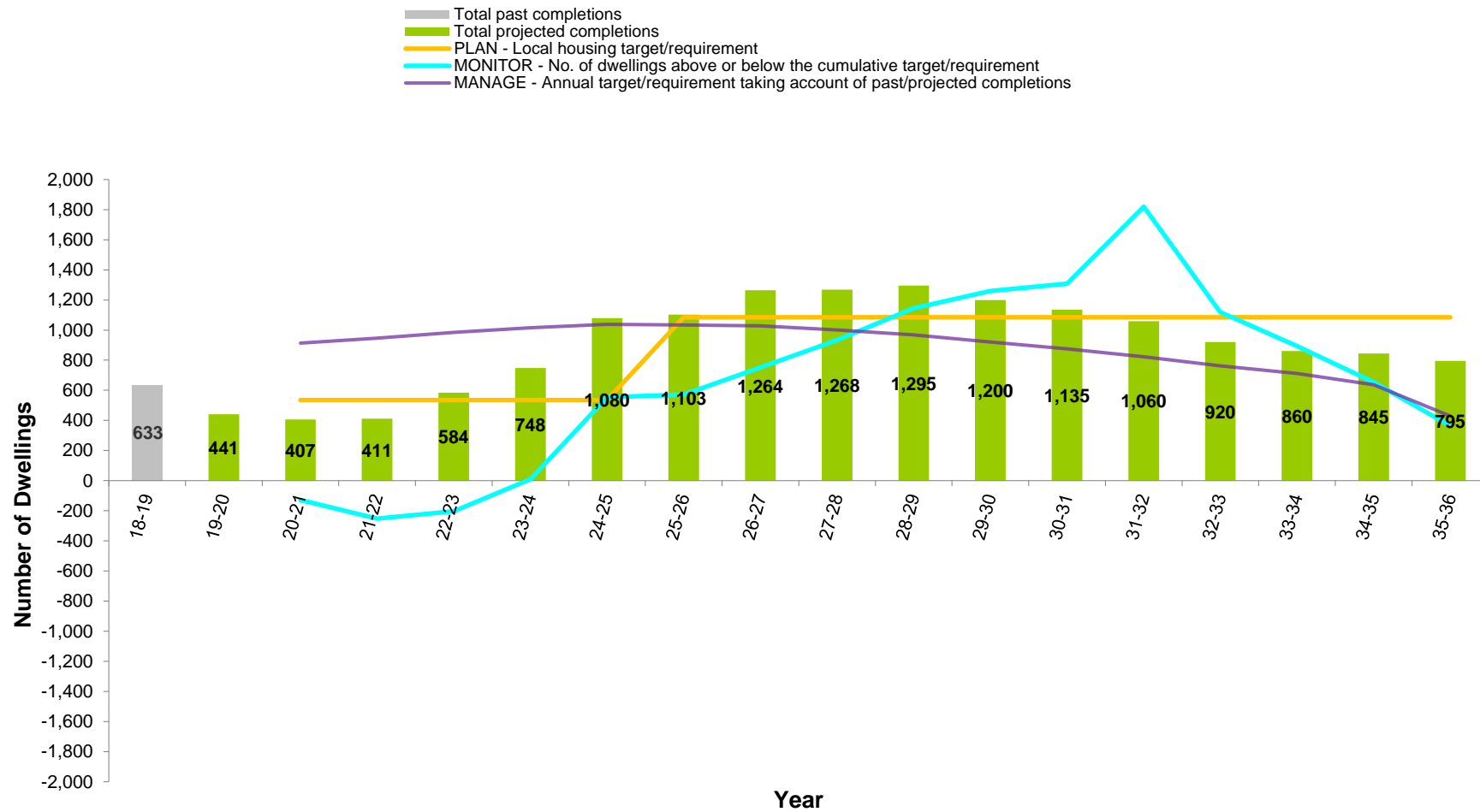
	Pre Plan Period			Plan Period																
Year	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	33-34	34-35	35-36	Total
Total past completions	432																			432
Total projected completions		426	428	544	541	703	744	869	1,047	1,209	1,265	1,285	1,200	1,100	995	920	860	795	795	15,726 (including Pre Plan Period) 14,871 (Plan Period)
Cumulative completions				544	1,084	1,787	2,531	3,400	4,447	5,656	6,921	8,206	9,406	10,506	11,501	12,421	13,281	14,076	14,871	
PLAN - Local housing target/requirement				565	565	565	565	565	1,075	1,075	1,075	1,075	1,075	1,075	1,075	1,075	1,075	1,075	1,075	14,650
MONITOR - No. of dwellings above or below the cumulative target/requirement				-21	-46	92	271	575	547	681	871	1,081	1,206	1,231	1,716	996	781	501	221	
MANAGE - Annual target/requirement taking account of past/projected completions				913	940	969	989	1,010	1,023	1,020	999	966	921	874	829	787	743	685	574	

HOUSING TRAJECTORY: St Albans District Council 1 April 2018 (Indicative Draft)

		Land Supply - To 1 April																						
Source		Pre plan period			Plan Period																	Total		
		2017/18	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	32/33	33/34	34/35	35/36				
Current known/expected delivery (2020-2036)	a) Existing planning permissions																							
	Under construction	150	142	49	18	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	367			
	With planning permission (full or reserved matters covering whole site)	10	27	95	212	215	170	18	10	0	0	0	0	0	0	0	0	0	0	0	757			
	Small Sites with permission	90	38	16	10																154			
	Conversions with permission	36	34	14	8																92			
	With outline permission with part(s) covered by reserved matters																				0			
	Outline only	0	0	0	47	70	54	0	0	0	0	0	0	0	0	0	0	0	0	0	171			
	Office to Residential Prior Approval 10%discount	142	156	113	48	12	9	0	0	0	0	0	0	0	0	0	0	0	0	0	480			
	Total	428	397	287	343	297	241	18	10	0	0	0	0	0	0	0	0	0	0	0	2,021			
		Land Supply - To 1 April																						
Source		Pre plan period			Plan Period																	Total		
		2017/18	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	32/33	33/34	34/35	35/36				
Current known/expected delivery (2020-2036)	b) Other commitments																							
	Where full, Outline or reserved matters at post committee resolution or subject to S106 negotiations	0	0	50	56	50	50	0	0	0	0	0	0	0	0	0	0	0	0	0	206			
	Garage Sites Program	13	7	8	18	20	2	5	3	7	6	0	0	0	0	0	0	0	0	0	89			
	Total	13	7	58	74	70	52	5	5	3	7	6	0	0	0	0	0	0	0	0	295			
		Land Supply - To 1 April																						
Source		Pre plan period			Plan Period																	Total		
		2017/18	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	32/33	33/34	34/35	35/36				
Local Plan - Broad Locations	c) Proposed site allocations																							
	EHH North (1,600 not inc. 120 at Spencers Park Pll)							75	140	180	180	180	180	180	180	140	100	65			1,600			
	North Hemel (1,500)																75	125	125	125	575			
	E+H South (2,400)							75	140	180	180	180	180	180	180	180	180	180	180	180	2,195			
	NW Harpenden (580)						75	75	75	75	75	75	75	75	75	75	75	75	75	75	580			
	East St Albans (900 + 348 already permitted)							75	100	100	100	100	100	100	100	100	100	100	100	100	900			
	N St Albans (1,100)						75	120	120	120	120	120	120	120	85						1,000			
	NE Harpenden (760)										75	75	75	75	75	75	85	75	75	75	75	760		
	W of London Colney (440)										75	75	75	75	75	65						440		
	Chiswell Green (365)								75	75	75	75	75	65								365		
	Park Street Garden village 2,300										80	150	180	180	180	180	180	180	180	180	180	1,670		
	Total						150	420	650	805	960	1,030	1,050	965	865	760	685	625	560	560	10,085			
		Land Supply - To 1 April																						
Source		Pre plan period			Plan Period																	Total		
		2017/18	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	32/33	33/34	34/35	35/36				
Current known/expected delivery (2020-2036)	d) Other sources																							
	With application submitted	0	0	0	25	25	24	24	24	0	0	0	0	0	0	0	0	0	0	0	122			
	With pre-application discussions occurring	0	0	49	40	45	92	65	0	0	0	0	0	0	0	0	0	0	0	0	291			
	Allocation only	0	0	0	0	0	18	11	11	0	0	0	0	0	0	0	0	0	0	0	40			
	SHLAA Sites and other sites	0	0	0	40	70	94	45	16	0	8	0	0	0	0	0	0	0	0	0	273			
	Windfall Allowance	53	79	89	95	105	105	105	105	105	105	105	105	105	105	105	105	105	105	105	1,891			
	Council Owned Sites						20	20	20	20	20	20	20	20	20	20	20	20	20	20	260			
	Unanticipated delay factor*	-62	-57	-55	-73	-71	-73	31	30	30	30	30	30	30	30	30	30	30	30	0				
Local Plan / NPPF Policies - Delivering Urban Optimisation	Intensification / Conversion of Employment Land					0	0	0	40	40	40	40	40	40	40	40	40	40	40	40	440			
	Council Owned Sites							0	0	20	20	20	20	20	20	20	20	20	20	20	220			
	Increased Density in Higher Buildings						0	0	0	20	20	20	20	20	20	20	20	20	20	20	220			
	Total	-9	22	83	127	174	260	301	206	235	243	235	235	235	235	235	235	235	235	235	3,757			
*Discount is applied to unstated permissions only																								
		Land Supply - To 1 April																						
Source		Pre plan period			Plan Period																	Total		
		2017/18	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	32/33	33/34	34/35	35/36				
a) Existing planning permissions		428	397	287	343	297	241	18	10	0	0	0	0	0	0	0	0	0	0	0	2,021			
b) Other commitments		13	7	58	74	70	52	5	5	3	7	6	0	0	0	0	0	0	0	0	295			
c) Proposed site allocations							150	420	650	805	960	1,030	1,050	965	865	760	685	625	560	560	10,085			
d) Other sources		-9	22	83	127	174	260	301	206	235	243	235	235	235	235	235	235	235	235	235	3,757			
Estimated Total Supply (Trajectory Total)		432	426	428	544	541	703	744	869	1,047	1,209	1,265	1,285	1,200	1,100	995	920	860	795	795	14,871			
NB: Trajectory Average 2020-2025; 2025-2030; 2030-2036																								
		680										1,201										910		929
NB: Housing Requirement/Target - inc. 20% buffer for 2020-2025 and remainder averaged over 2025-2036																								
		565										1,075										1,075		915

M8Q3 Appendix 3: Graph of Local Plan Appendix 2 - Housing Trajectory (1 April 2019)

Emerging Local Plan Housing Trajectory: St Albans District Council (1 April 2019)



Housing Trajectory: St Albans District Council 1 April 2019

	Pre Plan Period		Plan Period																
Year	18-19	19-20	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	33-34	34-35	35-36	Total
Total past completions	633																		633
Total projected completions		441	407	411	584	748	1,080	1,103	1,264	1,268	1,295	1,200	1,135	1,060	920	860	845	795	15,416 (including Pre Plan Period) 14,974 (Plan Period)
Cumulative completions			407	818	1,401	2,149	3,229	4,332	5,596	6,864	8,159	9,359	10,494	11,554	12,474	13,334	14,179	14,974	
PLAN - Local housing target/requirement			535	535	535	535	535	1,085	1,085	1,085	1,085	1,085	1,085	1,085	1,085	1,085	1,085	1,085	14,610
MONITOR - No. of dwellings above or below the cumulative target/requirement			-128	-252	-204	9	554	572	751	934	1,144	1,259	1,309	1,819	1,119	894	654	364	
MANAGE - Annual target/requirement taking account of past/projected completions			913	947	985	1,016	1,038	1,035	1,028	1,002	968	922	875	823	764	712	638	431	

M8Q3 Appendix 4

HOUSING TRAJECTORY: St Albans District Council 1 April 2019

		Land Supply - To 1 April																	
Source		Plan Period																	
a) Existing planning permissions		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)	Under construction	259	178	135	126	147	10	0	0	0	0	0	0	0	0	0	0	855	
	With planning permission (full or reserved matters covering whole site)	11	72	187	65	62	31	27	0	0	0	0	0	0	0	0	0	455	
	Small Sites with permission*	62	59															121	
	Conversions with permission*	55	35															90	
	With outline permission with part(s) covered by reserved matters																	0	
	Outline only	0	8	-2	16	10	10	0	0	0	0	0	0	0	0	0	0	42	
	Office to Residential Prior Approval (10% discount**)	5	0	38	0	0	0	0	0	0	0	0	0	0	0	0	0	43	
	Total	392	352	358	207	219	51	27	0	0	0	0	0	0	0	0	0	1,606	

*90% assumption on unstated permissions **10% discount on unstated permissions

		Land Supply - To 1 April																	
Source		Plan Period																	
b) Other commitments		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)	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	
	Garage Sites Program	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	
	Total	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	

		Land Supply - To 1 April																	
Source		Plan Period																	
c) Proposed site allocations		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	Post plan
Local Plan - Broad Locations	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	55								580	
	East St Albans (902 + 348 already permitted)				75	100	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	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)							80	150	180	180	180	180	180	180	180	180	1,670	630
Total				150	420	650	805	960	1,030	1,050	965	900	825	685	625	610	560	10,235	1,760

		Land Supply - To 1 April																	
Source		Plan Period																	
d) Other sources		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)	With application submitted	-24	20	27	28	53	49	40	0	0	0	0	0	0	0	0	0	193	
	With pre-application discussions occurring	6	0	3	24	14	7	10	10	10	0	0	0	0	0	0	0	84	
	Allocation only	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	10	30	0	0	0	0	0	0	0	0	0	0	40	
	Windfall Allowance	92	105	111	123	123	123	123	123	123	123	123	123	123	123	123	123	1,907	
Local Plan / NPPF Policies - Delivering Urban Optimisation	Unanticipated delay factor***	-65	-65	-65	-65	0	20	24	25	32	32	32	32	32	32	32	32	0	
	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		9	60	76	121	211	247	277	238	245	235	235	235	235	235	235	235	3,064	

***Unanticipated delay factor on unstated permissions

		Land Supply - To 1 April																	
All Sources - Estimated Total Supply		Plan Period																	
		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	
a) Existing Planning Permissions		392	352	358	207	219	51	27	0	0	0	0	0	0	0	0	0	1,606	
b) Other Commitments		5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	
c) Proposed site allocations		0	0	150	420	650	805	960	1,030	1,050	965	900	825	685	625	610	560	10,235	
d) Other sources		9	60	76	121	211	247	277	238	245	235	235	235	235	235	235	235	3,064	
Estimated Total Supply (Trajectory Total)		407	411	584	748	1,080	1,103	1,264	1,268	1,295	1,200	1,135	1,060	920	860	845	795	14,974	

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

						646					1,226						936	936	
NB: Housing Requirement/Target - inc. 20% buffer for 2020-2025 and remainder averaged over 2025-2036						535					1,085						1,085	913	

NB: Row heading 'Unanticipated Delay Factor' includes figures (total of -65 dwellings) allocated in the pre-plan period (years 2018/19 to 2019/20) to result in overall total figure of 0 dwellings by the end of the plan period (year 2035/36)

NB: Estimated Total Supply (Trajectory Total) figure of 14,974 dwellings includes total figure of +65 dwellings for row heading 'Unanticipated Delay Factor' allocated in the plan period (years 2020/21 to 2035/36)

M8Q4 Appendix 1

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.

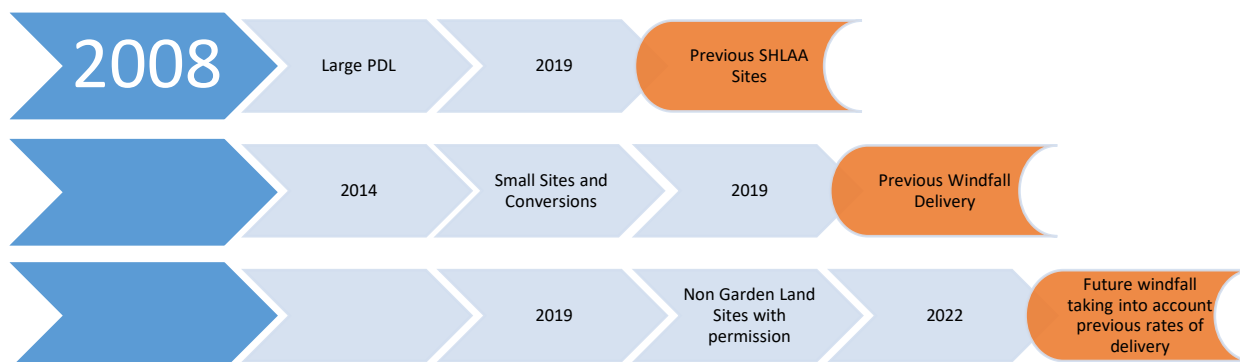
Plus

- 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
1) City, Towns - Main urban settlements excluded from the Green Belt	<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
1) City, Towns - Main urban settlements excluded from the Green Belt	<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.

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	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	55							580	
East St Albans (902 + 348 already permitted)						75	100	100	100	100	100	100	100	100	25				900	
North St Albans (1,100)					75	120	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
NB: Housing Requirement/Target - inc. 20% buffer for 2020-2025 and remainder averaged over 2025-2036							535					1,085						1,085	913

Housing Delivery Test: 2018 measurement (Sourced from 19 February 2019 publication)

ONS code	Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2018 measurement	Housing Delivery Test: 2018 consequence
		2015-16	2016-17	2017-18		2015-16	2016-17	2017-18			
E07000240	St Albans	670	668	649	1,987	396	347	412	1,155	58%	Buffer

M8Q12 – Appendix 1Historic rates of Affordable Housing completions since 2000

<u>Year</u>	<u>Annual Total</u>	<u>Affordable</u>
2000-01	415	30
2001-02	356	64
2002-03	301	45
2003-04	248	7
2004-05	601	243
2005-06	329	28
2006-07	377	10
2007-08	293	36
2008-09	398	92
2009-10	272	129
2010-11	382	115
2011-12	380	20
2012-13	320	105
2013-14	375	-42
2014-15	313	70
2015-16	396	97
2016-17	340	59
2017-18	493	106
2018-19	731	115
Total	7,320	1,329
Average Per Annum	385	70