

## **The St Albans City & District Strategic Local Plan: A Local Housing Target; Affordable Housing; Housing Type/Size/Mix**

### **Background**

As set out in a Briefing Note sent to all Councillors on 17 August 2012 (see Appendix A), the District Council is currently working on the preparation of the following Development Plan Documents (DPDs), which together will form the new Local Plan for the District, ultimately replacing the 1994 Local Plan:

- Strategic Local Plan (SLP) – overarching policies, principles and spatial vision. The level and location of sustainable development (formerly known as the Core Strategy)
- Detailed Local Plan (DLP) – detailed policies; including site allocations, new proposals maps and comprehensive suite of policies.

The SLP is based on its community's vision contained in the Sustainable Community Strategies for St Albans and Hertfordshire. It must also comply with other legal requirements, including the need to have regard to the Government's national planning policy, including the National Planning Policy Framework and to be based on proportionate and justifiable evidence.

On 27 March 2012, Department of Communities and Local Government (DCLG) published the final version of the NPPF. It came into effect immediately, superseding nearly all other planning guidance and can be seen at <http://www.communities.gov.uk/publications/planningandbuilding/nppf>

The SLP and subsequent DLP need to strike an appropriate balance between Economic, Environmental and Social aims, within the parameters of the NPPF and other planning policy and law, based on an evidence base and with confidence in delivery, in order to deliver sustainable development. This is then tested at an independent Examination In Public, where the concept of "soundness" is tested (see NPPF paragraph 182). As indicated by responses to previous consultations, it is likely that the most contested element will be the level of sustainable housing development, especially in relation to the Green Belt.

Any figure SADC use as a housing target in the SLP will have to have been publicly consulted upon prior to the Pre-submission stage and subject to Sustainability Appraisal. At present, the Regional Plan figure of an average minimum of 360 dwellings per annum and the Locally Derived Housing Target of 250 dwellings per annum could be taken forward to the Pre-submission stage.

Both of these figures are substantially lower than the current traditional Office for National Statistics (ONS)/Department for Communities Local Government

(DCLG) population/household projection figures. Any other figure would have to be based on an appropriate evidence base and then consulted upon.

The Government's latest household projections for St Albans City and District - the Department for Communities and Local Government (DCLG) 2008-based sub-national household projections, suggest that there will be a requirement for 11,700 new households in the district over the plan period (to 2028). This equates to 688 households per annum, significantly higher than the adopted Regional Spatial Strategy housing requirement for St Albans City and District to deliver 360 households per annum.

The majority of Councils, including all Hertfordshire councils at advanced stages of their Local Plans, are currently making progress based either wholly or very close to their Regional Plan target or their ONS/DCLG projections.

## **Sustainable Development**

The NPPF has replaced the previous guidance in PPS12 and PPS3 and in simple terms moves the Government's planning agenda to one of Sustainable Development. The definition of what constitutes sustainable development is 201 paragraphs long; i.e. the document almost in its entirety.

*6 The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.*

*7 There are three dimensions to sustainable development: economic, social and environmental.*

*8 These roles should not be undertaken in isolation, because they are mutually dependent.*

## **Competing Aspirations Within The NPPF**

The NPPF sets out its presumption in favour of sustainable development very clearly at paragraph 14. Included within the paragraph is the real tension between aspirations for positively seeking to meet development needs and positively seeking to protect the openness of the Green Belt in this district.

*14 At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking. For **plan-making** this means that:*

● *local planning authorities should positively seek opportunities to meet the development needs of their area;*

● *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

—*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

—*specific policies in this Framework indicate development should be restricted.*<sup>9</sup>

[9] *For example, those policies relating to ... land designated as Green Belt...*

In later sections of the NPPF this tension is laid out again, as the NPPF sets out very clearly that boosting significantly the supply of housing is a key aim, as also is the protection of the openness of the Green Belt. Some of the most relevant quotes include:

*17 Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area*

*47 To boost significantly the supply of housing, local planning authorities should:*

*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*

*89 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

In finding the right approach to finalizing the Local Housing Target, the NPPF as a whole has been considered. In conjunction, the Minister for Decentralization and Cities, Greg Clarke, made some pertinent points in his statement to the House of Commons on 27 March introducing the NPPF. He set out very clearly that the NPPF:

*Makes it clear that relevant policies - such as those protecting the Green Belt, Sites of Special Scientific Interest, National Parks and other areas - cannot be overridden by the presumption;*

## **SADC Consultation 2010-2011**

For a substantial time prior to the publication of the final NPPF, SADC have sought to establish an appropriate balance between factors and objectives in determining the right level of sustainable development and the corresponding Housing Target. The Locally Derived Housing Target of 250 per annum was identified in 'Consultation on the Strategy for Locating Future Development in the District' and consulted upon in 2010-2011 as set out below:

*"The Council has sought to find the most appropriate balance between all factors, especially providing 100 affordable homes per year whilst protecting the Green Belt. The fine balance between competing aims has led to a new local housing target of 250 homes per year.*

*Many complex factors must be considered in deciding the right amount, including the following:*

- The continuing pressure for more affordable housing*
- The potential for housing development in existing settlements*
- Population data, household growth data and the historic house building rate*
- The need for new community facilities and transport improvements*
- The Sustainability Appraisal process, which explores the social, environmental and economic impact of development*

*The views of the local community; in particular the desire to retain the individual character of settlements, are another important factor."*

## **Factors**

### Introduction

The purpose of this section is to set out the rationale behind the approach to the overall level of housing provision and the spatial distribution of growth in the St Albans SLP. The Council considers that the planned housing requirement is deliverable, justified and appropriate. It represents a coherent expression of the district's strategic and local priorities set in the context of social, economic and environmental objectives, in accordance with the principles of sustainable development.

The following key factors have therefore been taken into account in determining the most appropriate level of housing growth in the St Albans SLP:

A. Our strategic objectives for the authority, as expressed in the Sustainable Community Strategy;

- B. The Sustainability Appraisal process;
- C. The authority's contribution to the overall vision for the East of England as a sub-region;
- D. The views of our communities determined through extensive public consultation;
- E. Local Economy;
- F. Infrastructure Deficit;
- G. Evidence of past completions;
- H. Detailed technical evidence about how much growth the area could accommodate;
- I. Technical assessment of population growth and housing need;
- J. Evaluations of the impacts of alternative future housing targets, tenures and sizes;
- K. Recent changes in national policy – the localism agenda.

### **A. Our strategic objectives for the authority, as expressed in the Sustainable Community Strategy**

The Planning and Compulsory Purchase Act 2004 requires that the local planning authority must have regard to any Sustainable Community Strategy for the area in preparing a local development document.

The St Albans SLP sets out a spatial vision and an approach to how future development should be managed. This relates closely to the higher level priorities set out in the Sustainable Community Strategy: Ensuring the District is a great place to be; Creating a diverse and sustainable economy for the 21st century; Keeping the District healthy; Supporting an active community that has pride in itself and cares for its future.

The SLP develops the 11 key issues that form the basis of responding to the challenges of delivering sustainable development in St Albans. These stem from the Sustainable Community Strategy priorities and this inter-relationship sets the context for the SLP. The level and distribution of future development planned accords with the objectives of this higher level plan.

### **B. The Sustainability Appraisal process**

The Sustainability Appraisal/ Strategic Environmental Assessment process is an ongoing one and has informed all stages of SLP preparation. The process is complex, but in the context of this district there is overall support for lower rather than higher housing targets, assessed across the interrelated range of Economic, Environmental and Social roles.

This overall balance includes the full range of the three roles, including potential impacts upon: biodiversity; soil sealing; greenhouse gas emissions; air quality;

resource efficiency; historic and cultural assets; equality and social exclusion; community identity & participation; landscape and townscape; fairer access to services; healthcare facilities and good quality housing.

For example, the Sustainability Appraisal Working Note accompanying the 2010 consultation document, compared between a higher (360) target and a lower (250) target as follows:

***Environmental:*** *The lower levels of growth proposed would mean that there would be less pressure on greenfield sites in the Green Belt as much of the development would be provided in urban brownfield sites. This would have positive effects in terms of reducing impacts on biodiversity, protecting local landscapes, avoiding the reduction of gaps between settlements, and resulting in lower levels of soil loss. The lower growth would also mean that there will be less pressure on transport infrastructure which would help to avoid increases in greenhouse gas emissions as well as resulting in lower levels of any increase in air pollution from vehicles.*

*As it would be possible to deliver this lower level of growth through fewer and smaller strategic sites, so some of the opportunities that existed at the higher growth level would be lost. These could have included green infrastructure improvements and the improvement of degraded landscapes in some edge of settlement areas.*

***Social:*** *The lower levels of growth would mean that there would be a larger shortfall in terms of meeting the identified overall housing needs of the District which would have societal implications and potential associated health and wellbeing issues. There could also be an out-migration of local people from the District to any neighbouring areas which do have available housing.*

*As with the environmental topics there would also be a reduced potential for realising any major community infrastructure planning gains now that there are fewer and smaller strategic housing sites proposed. However to counter this, the lower levels of growth would place less strain on existing community infrastructure than if the higher levels had been taken forward.*

***Economic:*** *The new lower housing target would result in less additional support for shops and services in local and town centres which may already be under pressure in terms of viability. Given the already high levels of out-commuting from the District, and the limited new Strategic Employment allocations proposed, the lower level of growth would limit any increase in out-commuting.*

### **C. The authority's contribution to the overall vision for the East of England Plan (EEP)**

The importance of the protection of the openness of the Green Belt has long been acknowledged as a significant factor in plan-making, including for the East

of England Plan (EEP). The EEP recognised the protection of the Green Belt as a sufficient reason in the EEP for this district to plan for very substantially below traditional DCLG/ONS population/household projections. This can be seen through the facts that both Strategic and Local Green Belt Reviews were set out in the EEP, which did not include land in this district.

In fact, a legal challenge removed reference to the possible review of the Green Belt boundary in this district. The final policy confirmed that the broad extent of the Green Belt in the region should be maintained and for this district proposed no Strategic or Local Green Belt Review.

***POLICY SS7: Green Belt***

*SS7: Green Belt The broad extent of green belts in the East of England is appropriate, and should be maintained. However, strategic reviews of green belt boundaries are needed in the following areas to meet regional development needs at the most sustainable locations:*

- Stevenage, involving land in Stevenage and North Hertfordshire;*
  - Harlow, involving land in Harlow, East Hertfordshire and Epping Forest Districts;*
- and*

*A more local review will be required in Broxbourne.*

It was an acknowledged fact in the EEP that the housing target for the district in the EEP (at least 360 per annum) would not fully account for DCLG/ONS population/household projections

*5.3 ...provision is less than forecast household growth*

*5.5 ...the figure of 508,000 dwellings falls significantly short of what is needed based on evidence about housing pressure, affordability and household projections.*

*5.6 ...it will be sufficient to indicate broad areas for growth after 2021. Robust evidence will be needed to justify not doing so, for example green belt constraints in districts not proposed for green belt review.*

In combination with the adopted timeframe of 2001 to 2021, it is clear that the overall approach to the appropriate level of a housing target in this district was set out as one which overwhelmingly prioritized the protection of the openness of the Green Belt above that of fully meeting perceived “need”.

**D. The views of our communities determined through consultation**

The NPPF sets out very clearly the importance of consultation with the community, engagement and reflecting a community vision for sustainable development, including at:

*150 Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities*

*155 ...A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area*

The SLP has been developed as a result of extensive on-going engagement with our communities, partners and other stakeholders. The strategy has been developed following consultations on Issues and Options documents in 2006 and 2007, the Emerging Plan in 2009 and on the Strategy for Locating Future Development in the District in 2010/2011; as well as a more targeted workshops with key stakeholders, to establish the views of our communities on the key issues and objectives for the district.

Representations made during these public consultations from residents, businesses, organisations, elected representatives and other stakeholders have been key in shaping this document. From the representations made and the numerous letters and comments that have been sent to the Council there have been some key messages:

- There was particular strong opposition to options for potential urban extensions and areas of search in St Albans and Harpenden. Communities considered that the urban extensions would have unacceptable effects on the Green Belt, important views and landscape features and access to the countryside.
- It is clear that the Green Belt and open countryside is widely cherished by many people. Respondents prioritised objectives which seek to protect and manage the environment: 'protecting natural and historic assets' (97% agree overall; 79% strongly agree) and 'actively managing and improving the Green Belt (95%; 78%).

## **E The Local Economy**

As set out by Herts LEP, Hertfordshire is the fifth largest economy outside London. It is home to over one million people and 47,000 businesses. Our economy is worth around £25bn – around 2% of the UK economy.

Compared to most areas of the UK, Hertfordshire is more prosperous and our residents have a better quality of life.

Hertfordshire contains all of the key components of a globally competitive location, namely:

- Significant employment in future growth sectors – Life sciences, Film & media, Advanced manufacturing/aerospace, Business services (financial & ICT)
- A highly qualified population – Higher than UK average for GCSE to degree level skills
- A well connected, strategic location – Major roads [M25, M1, A1(M)], strategic rail corridors, three international airports nearby
- A good quality of life – Excellent housing and schools, strong retail offer, green spaces

The LEP believe that the Hertfordshire economy can make a bigger contribution to UK plc. Focused effort is required to ensure we remain an attractive proposition for private sector investment. Herts LEP has produced a plan for growth titled 'Open for Business' which is seeking to build on our assets within Hertfordshire.

The City and District of St Albans is a key driver in Hertfordshire's economy. The District is a major hub for intellectual capital as nearly 50% of the residents have higher education qualifications. The District is also home to two global centres of excellence in the environmental sector – Rothamsted Research and the BRE – which require highly skilled high value employees. The district is also host to key businesses in the growth sector outlined above as Business services. These are primarily in the areas of financial services, consultancy and the legal profession.

In St Albans the unique and exceptional quality of the built and natural environment continues to be very important in supporting the prosperous local economy and providing a range of jobs for all. Key local employers and entrepreneurs agree that St Albans is a good place to locate business and to do business and the vital role that quality of life factors play in supporting the local intellectual capital economy. The district is economically thriving precisely because of these factors, an absolutely key element of which is the retention of the Green Belt. This includes all five of the core purposes Green Belt: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration.

## **E Infrastructure Deficit**

In simple terms, the historic infrastructure deficit is the shortage of the infrastructure needed to support the existing residents and businesses.

This includes deficiencies where facilities or amenities are:

- Inadequate in size to serve the needs of the residents and businesses as evidenced by excess demand or in other cases such as open spaces where the scale of provision falls short of widely adopted planning benchmarks.
- Clearly functionally inadequate when measured against typical current standards or adopted policy.

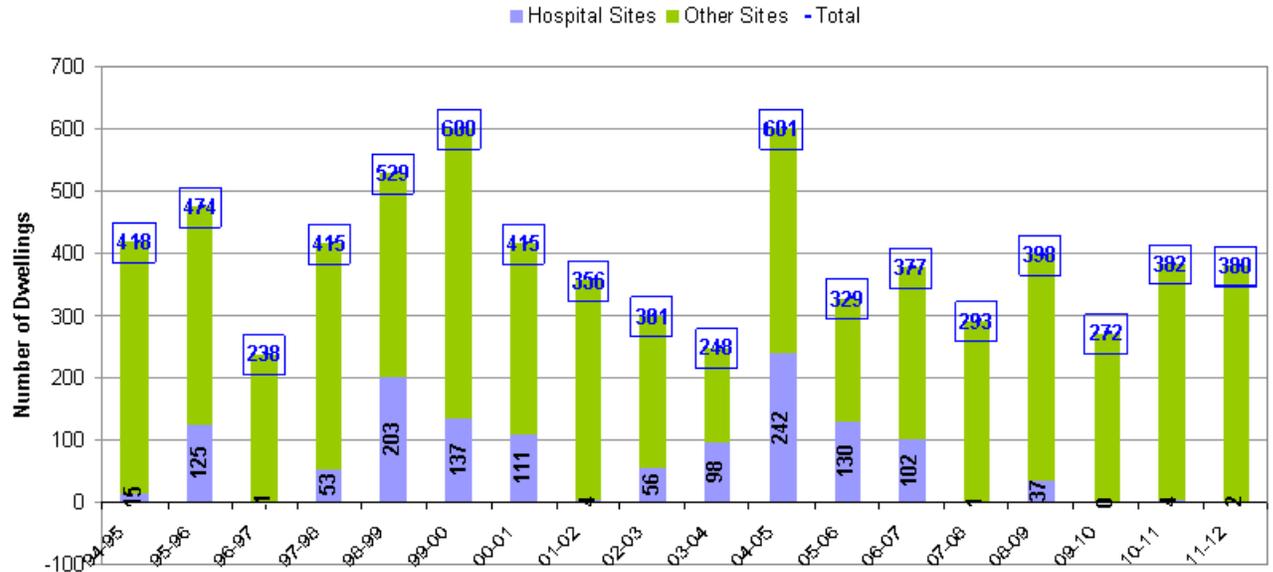
The Hertfordshire Infrastructure Investment Strategy identified that Hertfordshire has a measurable infrastructure deficit totaling over £2.4bn. This is the financial shortage against standards required for infrastructure and what is currently provided. The majority of this comes from highways and education infrastructure need.

New housing will exacerbate this existing infrastructure deficit, leading to further infrastructure related problems, such as congested roads and unfit school buildings.

## **F Evidence of past completions**

In the early 1990s the Government and Regional Health Authority adopted policies putting a strong emphasis on local service provision known as 'community care'. This resulted in the gradual contraction of hospital facilities and the phased release of land at 3 hospitals in the district,. These were, Hill End, Cell Barnes and Napsbury hospitals, which comprised previously developed land in the Green Belt.

Past completions were boosted between 1995/6 – 2006/7 by redevelopment of these redundant hospital sites, which provided the district with significant development over approximately 12 years, in the region of 1,300 homes. However these hospital sites have now been built out. This historic circumstance will not be repeated and it is clear that the supply of future non-green field Green Belt sites will be affected compared to historic provision. The contributions from hospital sites are indicated on the graph below.



## G Detailed technical evidence about how much growth the area could accommodate

Technical work to inform the Council's SLP includes the Environmental Capacity Study (2012) in support of the Council's position in relation to proposals for housing levels and distribution in the district. This can be found at

<http://www.stalbans.gov.uk/environment-and-planning/planning/policy/ldfevidencebase.aspx>.

St Albans Council considers that environmental and sustainability considerations should play a prominent role in the overall planning balance to establish the housing strategy. Consequently it has used environmental capacity study and other evidence such as sustainability appraisal work to inform and justify the pre submission publication SLP.

The Environmental Capacity Study started before the final NPPF, but was finalised immediately post the NPPF publication. It is believed that this district is the first in the UK to have commissioned such work, including utilising 'Ecosystems Services' information and approaches. This approach has now been supported by the NPPF (at paragraph 109). Key highlights include:

- The ecological footprint of the district reveals an unsustainable pattern of consumption of energy and resources. For example, an area of biologically productive land fifty times the size of the district is required to sustain its current population (approximately equivalent to Hertfordshire, Bedfordshire, Buckinghamshire and Essex combined).
- An area of land eleven times the size of the district is required to sustain the district's current food consumption and to produce sufficient domestic

energy to support the local population would require an area of short-rotation coppice 1.7 times the area of the district.

- The district's non-urban areas will become even more important in terms of the district's ability to respond to energy and resource scarcity and climate change. Water resources are under immense pressure and over abstraction has resulted in biodiversity damage, including to local chalk streams.
- The retention and enhancement of the district's non-urban areas should be a key part of the local economic development strategy, due to its array of economic benefits.
- The Green Belt has worked successfully for more than 60 years in controlling the growth of Greater London. This has proven to be valuable for all Londoners in the sense that they all continue to live within a relatively short distance of the countryside. In St Albans City & District Green Belt has also served local people well, ensuring that the majority of residents live and work within close proximity to accessible and attractive countryside. The Green Belt has also helped the district's settlements to maintain their own individual special character.

In view of these factors and trends, the observations made regarding the various global and local ecosystems and the services they provide and the fact that we are already exceeding the capacity of the environment to support us, the study concludes that it would be unwise to permit further urban development in the district on undeveloped land. Where development is permitted a Compact City approach is recommended. A Compact City approach involves mixed-use settlements within urban areas, which make effective use of public transport and encourage walking and cycling. .

#### **H. Technical assessment of population growth and housing need**

*Are affordable housing requirements identified in the Strategic Housing Market Assessment (SHMA) likely to be achieved?*

The affordable housing need identified in the London Commuter Belt West SHMA (June 2010) represents 94% of the EEP housing delivery target. This is clearly unachievable.

Figure 149  
Tenure Mix of Housing Requirement 2007 to 2021 by LA based upon prices at long term trends (Note: Figures may not sum due to rounding)

| Housing Tenure                   | Local Authority |              |              |              |              |                 |
|----------------------------------|-----------------|--------------|--------------|--------------|--------------|-----------------|
|                                  | Dacorum         | Hertsmere    | St Albans    | Three Rivers | Watford      | Welwyn Hatfield |
| Market housing                   | 4,800           | 400          | 400          | (400)        | 800          | 3,400           |
| Intermediate affordable housing  | -               | 2,700        | 5,300        | 2,300        | 2,100        | 500             |
| Social rented housing            | 3,100           | 500          | 1,300        | 700          | 600          | 2,800           |
| <b>Total Housing Requirement</b> | <b>7,800</b>    | <b>3,600</b> | <b>7,000</b> | <b>2,700</b> | <b>3,600</b> | <b>6,600</b>    |
| Market housing                   | 60.7%           | 11.3%        | 6.2%         | -            | 23.9%        | 50.8%           |
| Intermediate affordable housing  | -               | 75.9%        | 75.8%        | 77.1%        | 60.4%        | 6.9%            |
| Social rented housing            | 39.3%           | 12.8%        | 18.1%        | 22.9%        | 15.7%        | 42.4%           |

Figure 153  
Summary of the Housing Requirement to 2021 by Local Authority, HMA and Sub-region based upon prices at long term price trends..

|                                 | Affordable Housing |              |            | Market Housing | All Housing |            |
|---------------------------------|--------------------|--------------|------------|----------------|-------------|------------|
|                                 | Social Rent        | Intermediate | Total      |                | Smaller     | Larger     |
| <b>Local Authority</b>          |                    |              |            |                |             |            |
| Dacorum                         | 39%                | -            | 39%        | 61%            | 44%         | 56%        |
| Hertsmere                       | 13%                | 76%          | 89%        | 11%            | 52%         | 48%        |
| St Albans                       | 18%                | 76%          | 94%        | 6%             | 50%         | 50%        |
| Three Rivers                    | 23%                | 77%          | 100%       | -              | 65%         | 35%        |
| Watford                         | 16%                | 60%          | 76%        | 24%            | 44%         | 56%        |
| Welwyn Hatfield                 | 42%                | 7%           | 49%        | 51%            | 38%         | 62%        |
| <b>Sub-Market</b>               |                    |              |            |                |             |            |
| Hemel Hempstead                 | 36%                | -            | 36%        | 64%            | -           | -          |
| St Albans                       | 23%                | 73%          | 96%        | 4%             | -           | -          |
| Watford                         | 22%                | 52%          | 74%        | 26%            | -           | -          |
| Welwyn Garden City and Hatfield | 32%                | 15%          | 47%        | 53%            | -           | -          |
| <b>Overall Sub-region</b>       | <b>27%</b>         | <b>38%</b>   | <b>65%</b> | <b>35%</b>     | <b>48%</b>  | <b>52%</b> |

The often very high total need figures indicated by SHMAs are not, on their own, a sufficient base for determining levels of affordable housing requirements/targets. Viability and practical barriers to delivery indicate that a pragmatic approach which aims to maximise delivery of affordable housing provides the best basis for strategic policy.

In this context, a total of 4,250 homes might theoretically support the delivery of 1,700 affordable homes however this will be dependant on the viability of individual schemes. If an average rate of 100 new affordable homes could be achieved this would compare well with the long term average of 72 affordable housing completions (2010 Housing Monitoring Report) and will result in an improvement in the provision of affordable housing in the district. In addition there is an intended significant increase in delivery of affordable homes on Council owned land.

*Is housing growth sufficient to meet trend population growth requirements?*

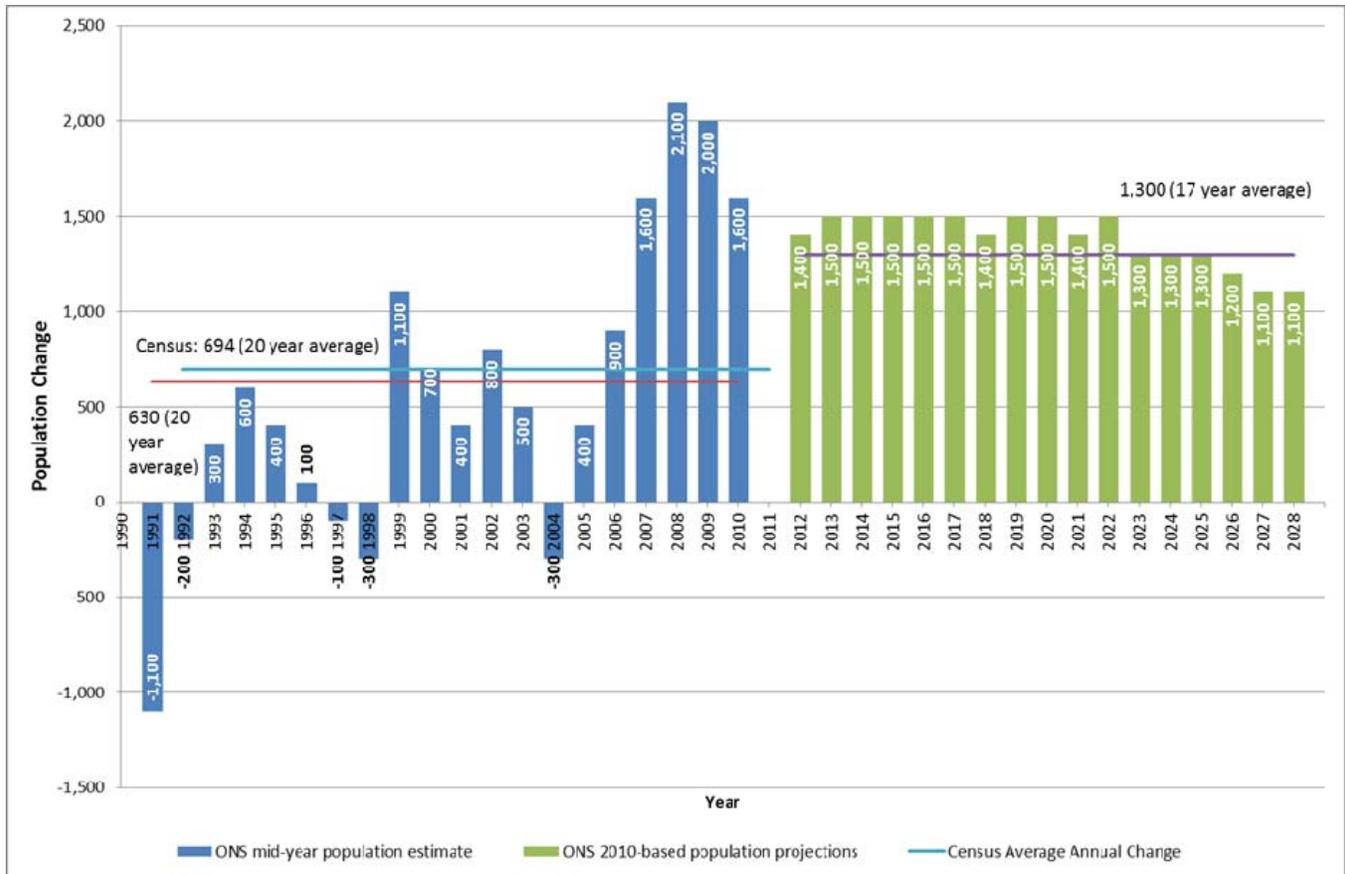
As set out on page 2, the Government's latest household projections for St Albans City and District - the Department for Communities and Local Government (DCLG) 2008-based sub-national household projections, suggest that there will be a requirement for 11,700 new households in the district over the plan period (to 2028). This equates to 688 households per annum, significantly higher than the adopted Regional Spatial Strategy housing requirement for St Albans City and District to deliver 360 households per annum.

A major component of the 2008 sub-national household projections is the Office for National Statistics (ONS) sub-national population projections. The latest version of this is the 2010-based projections, were published in March 2012. It is important to note that these are straight line projections based solely on recent population trends (2006-2010) in the levels of births, deaths and migration.

Based on documented evidence of longer term historic population trends and the recently published Census for 2011, the ONS 2010-based population projections for St Albans City and District can be considered likely to over inflate the projected level of population growth over the plan period. In the 17 year period 2012 – 2028, the population of St Albans City and District is projected to increase by 20,900 (an average of 1,229 persons per annum). In contrast 'actual' growth in the preceding 20 year period 1991 – 2011 was much lower at 13,884 (an average of 694 persons per annum).

Comparison between ONS historic estimates and projections set out in the table below illustrates that over the last two decades St Albans has undergone a net population increase in 15 out of 20 years. However there has been considerable fluctuation in growth with some years experiencing significantly higher population increases than others. The population declined in 5 out of 20 years.

Table 1: Annual population change estimated and projected (1991- 2028)



Furthermore, developing at the simple recent years trend rate illustrated by the DCLG projections ignores the essential influence of local policy objectives in planning for change, becoming a simplistic exercise in ‘predict and provide’. The projections are also sensitive to changes in average household size. Historically the number of persons per dwelling has been decreasing but the most recent data indicates that this has recently leveled out and is now increasing (see table below). This will reduce the housing requirement. For example 694 people at the average rate in the table below of 2.7 persons per dwelling requires 257 homes per year; however at 2.2 persons per dwelling this requires 315 homes.

| Census | Population | Households | Persons/Household |
|--------|------------|------------|-------------------|
| 1971   | 120,296    | 38,460     | 3.13              |
| 1981   | 124,308    | 42,927     | 2.9               |
| 1991   | 126,716    | 48,319     | 2.6               |
| 2001   | 129,005    | 52,659     | 2.45              |
| 2011   | 140,600    | 56,100     | 2.5               |

The high rate of projected growth in the DCLG/ ONS projections, assumes continuation of high levels of in-migration (particularly from other parts of the Hertfordshire and London, but also from overseas) that have been seen in the

recent past. It does not take into account any policy choices, policy changes, housing development or other factors which will influence future population levels.

## **I. Evaluations of the impacts of alternative future housing targets, tenures and sizes**

Technical work to inform the Council's SLP includes work on future housing targets, tenures and sizes. In the context of the particular circumstances of the district as a whole, this work in part analyses a range of potential housing scenario targets. It supports the previously consulted upon 250 target, as opposed to other options. This balanced approach can be summed up as:

***Scenario 1 [650]** would involve serious damage to the Green Belt and other planning aims and it cannot be seen as a practical outcome for St Albans.*

***Scenario 2 [360]** is clearly much less damaging than Scenario 1. However it would result in a considerable (10%) increase in out-commuting and general pressure on the road and other infrastructure.*

***Scenario 3 [250]** adds somewhat to the net out commuting, but not very much. It provides a potentially viable 54:46 mix of market to affordable housing.*

***Scenario 4 [100]** is clearly impractical as it is mostly affordable housing.*

## **I. Recent changes in national policy – the localism agenda**

Following the general election in May 2010, the Secretary of State announced the government's intention to abolish Regional Spatial Strategies. The primary legislation (the Localism Bill) has been enacted, and the government has clearly stated its intention to dismantle the regional planning system. The government has indicated that it is now for local authorities to set and justify their own housing numbers and distribution, as also set out in the NPPF.

The Minister for Decentralization and Cities, Greg Clarke, made some pertinent points in his statement to the House of Commons on 27 March introducing the NPPF. He set out very clearly that the final NPPF:

*...put unprecedented power in the hands of communities to shape the places in which they live;*

...

*...Is crystal clear that sustainable development embraces social and environmental as well as economic objectives and does so in a balanced way;*

...

*Makes explicit that the presumption in favour of sustainable development works through, not against, local plans;*

The Government's localism agenda has increased the emphasis on bottom-up plans that express the visions of local communities and the importance of achieving a better consensus in determining the balance between the impact of development and economic, environmental and social issues when setting housing targets.

The district's communities and the NPPF greatly value the fundamental aim of the retention and openness of the Green Belt. This openness plays many important roles; including preserving the setting, special character and historic nature of the district's settlements as well as providing accessible high quality open areas for London. This overriding value of openness is clearly recognised by the NPPF as development in Green Belt is specifically excluded from the presumption in favour of sustainable development.

## **Clear Rationale for SLP Housing Requirement**

As set out above, at the heart of the SLP is the spatial vision. The vision for 2028 is distinctive to the district and includes ambitions which are challenging yet realistic for protecting the natural environment, improving people's quality of life, maintaining a prosperous economy and providing a strategic direction for the creation of mixed and balanced communities over the next 15 years and beyond. The vision has taken account of the visions of the Sustainable Community Strategy, as well as the concerns, issues and priorities which have come through our engagement work.

The SLP strategy for development sets out the amount and locations of growth which will achieve this vision. It has been developed through a sound process which has involved continuing consultation with communities and other partners and gathering supporting technical evidence. The strategy has been subject to sustainability appraisal to ensure that the most sustainable choices have been made.

## **Costs And Benefits Of Higher And Lower Housing Targets**

The approach set out below acknowledges and balances the benefits and costs of relatively higher or lower housing targets. In relation to higher theoretical housing targets, relative benefits could briefly include:

| <b>Costs</b>   | <b>Benefits</b>   |
|--|---|
| <b>Relatively Higher Housing Targets</b>   |   |
| More development on green field Green Belt land and subsequent permanent loss of openness  | More homes for existing residents, workers and incomers   |
| Urban sprawl and possibly coalescence of settlements                                       | More affordable homes provided  |
| Greater impact on existing infrastructure, including transport, healthcare and education   | More New Homes Bonus  |
| Potentially worsen quality of life and therefore affect local intellectual capital economy | More Community Infrastructure Levy receipts   |
| Misalignment against majority of local public opinion                                      | Possibly more economic growth   |
| Worsen in-commuting/out-commuting number balance   | Possibly higher local retail expenditure growth   |
| Loss of biodiversity and natural environment   |   |
| Higher increase in greenhouse gas emissions  |   |
| Worsen reliance on external food and energy resources                                      |   |
| <b>Relatively Lower Housing Targets</b>  |   |
| Fewer homes for existing residents, workers and incomers                                   | Minimal development of green field Green Belt land preserving its openness for future generations                     |
| Fewer affordable homes provided  | Protection against urban sprawl and enabling individual settlements to retain their own unique character and identity |
| Less New Homes Bonus   | Lesser impact on existing infrastructure, including transport, healthcare and education                               |
| Less Community Infrastructure Levy Receipts  | Supporting the local intellectual capital economy, linked to quality of life factors                                  |
| Possibly less economic growth  | Localism in action – a clear alignment with locally expressed objectives  |
| Possibly lower local retail expenditure growth   | Improved in-commuting/out-commuting number balance  |
|  | Preserving the built and natural environment for current and future generations                                       |
|  | Lower increase in greenhouse gas emissions  |
|  | More land available for local food and energy production  |

## **Approach To Calculating A Sustainable Level Of Housing Provision**

It is considered that the most appropriate way to determine the starting point for calculating the sustainable level of housing provision for the plan period is the level of housing need; balanced against the space for appropriate and truly sustainable development.

As supported by the NPPF overall, especially at Para 14 and in Greg Clarke's speech introducing the NPPF to Parliament, the Sustainability Appraisal, the community and the factors briefly outlined above, the twin thrusts of the general distribution of development within this development strategy are;

- Maintaining the fundamental aim of the Green Belt in keeping land permanently open, by not developing on green field Green Belt land.
- Prioritising opportunities to maximise the economic, environmental and social benefits of sustainable development.

The development strategy for the district is based on a compact city approach through meeting future requirements by developing within existing settlements, particularly the City and towns, rather than extending into the Green Belt. This approach depends on using available sites within urban areas to their full potential, consistent with high quality design and balancing economic, social and environmental factors. Using land efficiently means that for each site, development is optimised and less land in total is needed as a consequence to meet the district's development requirements, with beneficial effects for protection of the countryside.

It is clear that housing should not be considered in isolation. It should take into account of other land uses needed to achieve sustainable communities, such as employment, retail, transport & community uses. The SLP is therefore considering sustainable development in the round. It ensures that the approach to maximizing opportunities for residential development on urban land or previously developed land in the Green Belt does not compromise the spatial strategy as a whole, including alternative desirable land uses in these areas. For example, the retention of appropriate existing employment sites to provide local jobs and opportunities for businesses to deliver growth is also of great importance and has been appropriately considered. Another example is the BRE Broad Location. Here the SLP has a proposed policy taking a holistic approach to the redevelopment of some redundant PDL for residential use, to support and retain a key employer in a key sector and provide significant community benefits.

Whilst the overall approach is set out above, there are some specific exceptions where building on green field Green Belt land is considered appropriate as part of the comprehensive spatial approach. These exceptions have been made in order to deliver truly exceptional levels of community benefits and at the same

time to go some way to meeting the higher range of housing needs figures and gaining overall benefits from more housing developments.

They are of two main types.

1. Large Community Infrastructure sites comprising large scale previously developed land in the Green Belt with unique community facilities. The SLP sets out some Green Belt green field housing development to support delivery of new and improved community facilities at:

Oaklands College  
Harperbury Hospital/Kingsley Green

2. Some limited small scale Green Belt green field residential developments where directly supported by local communities to deliver significant community benefits; delivered through the DLP. Also, where there is an established local need, some land adjoining or within villages may be developed to provide affordable housing where it is supported by the local community. Such small-scale 'rural exception' sites will help address the needs of lower-income households with a close family or employment connection to that settlement. These sites will be identified through the Neighbourhood Planning process.

## Local Housing Target/Requirement

Taking the approach set out above, the most up to date and historical information has been analysed to give confidence of delivery in the following categories. The table below indicates sources & approximate proportion of supply from different land types for housing development.

|   |                 |
|---|-----------------|
|   |                 |
| <b>Urban/Non-Green Belt Capacity</b>  | <b>45 – 50%</b> |
|   |                 |
| <b>Green Belt PDL</b>   | <b>5 – 10%</b>  |
|   |                 |
| <b>Broad Locations to be contained in the SLP</b><br>Including Oaklands, Harperbury and BRE | <b>15 – 20%</b> |
|   |                 |
| <b>Windfall</b>   | <b>20 – 30%</b> |
|   |                 |

|   |           |
|---|-----------|
| <b>Small scale Green Belt greenfield supported by local communities through DLP or Neighbourhood Plan process</b> | <b>5%</b> |
|---|-----------|

Taking account of all relevant aspects, including market factors and allowing for flexibility and contingency, the approach supports:

Local Housing Target/Requirement = 250 dwellings per annum

This target/requirement is an average figure and amounts to 4,250 dwellings across the plan period.

## **Affordable housing**

Having assessed the district's total housing requirement for the plan period the SLP will need to consider affordable housing and the size, type and mix of housing required in the district. Here follows extracts from the latest SLP, which will come to PPAG next week, for consideration:

- 6.36 The district's house prices are amongst the highest in Hertfordshire and the whole country and as a result local people on lower level incomes, especially younger people and key workers, often find themselves priced out of the market. This is also reflected by the number of people on the Council Housing register which suggests that there is a high need for affordable housing in the district.
- 6.37 The Council has long had a Corporate Priority to provide an appropriate amount of affordable homes. This priority has been considered as one of many factors in deciding the right amount of overall housing in the district.
- 6.38 The planning system has an important part to play in providing affordable housing for those unable to access the housing market. The need to provide affordable housing is important for two main reasons; firstly to enable people who cannot afford to rent or buy on the open market to live in a home that is suitable for their needs and that they can afford, and secondly to provide housing for people working in different aspects of the local economy, thus underpinning economic activity.

- 6.39 Viability work has been undertaken to establish the realistic level at which affordable housing can be delivered as a percentage of private housing in the district and provides strong evidence to increase the affordable housing target and reduce the threshold. In view of these studies, including the SHMA 2010 and the Development Economics Study 2010, the Council will be seeking 40% affordable housing on all housing development sites to assist in addressing the shortfall in affordable housing.
- 6.40 Affordable housing includes social rented, key worker (ie housing for teachers, nurses, care workers etc) and shared ownership homes. The balance between affordable and market housing and the size mix of affordable units is a key component of achieving a well balanced community.
- 6.41 The district requires more smaller market units and a range of small to medium sized affordable units. The Locally Derived Housing Target (Policy SLP 8) achieves a balance between providing market and affordable housing and provides enough cross subsidy to fund new affordable housing.
- 6.42 Affordable homes are mostly delivered by developers as a percentage of private housing developments. It is important to make clear that Affordable Housing relates to specific definitions (please see Glossary) primarily relating to tenure and ownership, which is distinct from common understanding of what may constitute relatively affordably priced market housing.
- 6.43 The tenure mix of affordable housing should reflect what people in housing need require in the district. Based on the council housing register and other housing evidence, affordable housing provision with a tenure mix different from 60% social rented (or affordable rent) and 40% intermediate will only be acceptable where robust justification is provided. This must include evidence that that provision at the standard requirement would make the development economically unviable; or that the resultant tenure mix would be detrimental to delivering sustainable mixed communities; or due to specific circumstances, the explicit agreement of the Council's Housing Department.
- 6.44 The St Albans Affordable Housing Viability Study 2010 considered that in relation to the size of sites coming forward based on planning application and SHLAA data, that there is a strong case to reduce the site size threshold to allow affordable housing to be sought from all new residential development.
- 6.45 Past and predicted future patterns of house building show that the district as a whole is reliant on smaller sites, below the national and regional threshold of 15. The high level of housing need and reliance on smaller sites justifies

lowering the threshold for securing affordable provision, without inhibiting development or prejudicing the overall supply of new housing.

- 6.46 Because of these circumstances, the Council's view is that it is appropriate and necessary for smaller housing schemes to make a reasonable contribution towards the provision of affordable housing and play their role in delivering sustainable mixed communities.
- 6.47 The Council will seek on-site provision for schemes of 5 or more dwellings. On smaller sites there may be occasions where on-site delivery is impractical. Therefore on small sites providing 4 or fewer dwellings the Council may accept commuted sums or off-site provision elsewhere in the district (providing that the provision elsewhere contributes to creating mixed and sustainable communities) in lieu of on-site provision.
- 6.48 There will on occasion be circumstances where financial contributions from small sites may affect viability. In these cases the applicant will be required to provide the Council with an open book assessment of viability to justify a lower commuted payment. Further guidance on affordable housing and commuted sums will be included in the Detailed Local Plan.
- 6.49 As a strict exception to normal Green Belt policy, and where there is an established local need and local support, some land adjoining or within villages may be developed to provide affordable housing for the community. These small-scale 'rural exception' sites will help address the needs of lower-income households with a close family or employment connection to that settlement. Such sites will remain in the Green Belt and the housing must remain affordable in perpetuity. The Council has an active programme of developing redundant garage land to assist delivery of affordable housing, including some schemes of this type in Green Belt settlements.

| <b>Policy SLP9 – Affordable Housing</b>  |   |
|--|---|
| The Council will seek affordable housing contributions from new residential development. |   |
| District-wide target   | At least 100 affordable homes per annum.  |
| Percentage target  | 40% affordable homes as a proportion of the overall development unless it is clearly demonstrated that this is not economically viable. In these circumstances affordable housing provision at a level which allows the scheme to be viable may be negotiated by the Council. |
| Targets for social rented/affordable rent and  | Of the affordable housing percentage target approximately 60% should be social rented/affordable rent and 40% intermediate housing to   |

|  |  |
|--|--|
| intermediate housing   | meet needs of residents in the district and the most vulnerable.   |
| Threshold for provision of affordable housing  | The Council will seek affordable housing provision from schemes for 1 (gross) or more dwellings.   |
| Developer contributions on small sites   | <p>Affordable housing should be provided on-site. However, for schemes of 4 homes or fewer where there are sound planning or other reasons, and the developer and Council agree, a financial contribution (or off-site provision) in lieu of on-site provision may be acceptable.</p> <p>The affordable housing contribution will be calculated using the Council's affordable housing toolkit and will be based on the equivalent of delivering affordable housing on-site. The sum may vary depending on site circumstances and viability.</p> |
| Affordable housing in Green Belt Settlements (Rural Exception sites)   | <p>Small scale 100% affordable housing schemes within rural parishes will be supported in principle for people with strong local connections, where there is demonstrable local need for such dwellings and local community support.</p> <p>Such sites will remain in the Green Belt and the housing must remain affordable in perpetuity. Detailed criteria for rural exception sites will be included in the DLP.</p>  |
| <p>The exact amount of affordable housing, or financial contribution, to be delivered from any specific scheme will be determined by economic viability, having regard to individual site circumstances and market conditions. Further guidance will be provided in the DLP and/or within Affordable Housing Supplementary Planning Documents or guidance.</p> |  |

## Housing Size, Type and Mix

Please find below the latest draft SLP text in regard to Affordable Housing.

### Housing Type/ Mix

6.50 There is a need to provide for the full range of housing types for a diverse population, including all demographic groups.

- 6.51 The proportion of older people in the population is forecast to continue to rise. While health improvements mean that older people are remaining active for longer, an increase in the number of frail elderly is expected. This means providing new homes that enable people to continue to live independently even though their mobility may be reduced. Appendix B sets out St Albans age profile.
- 6.52 While most older people prefer to remain in their own homes, some increased provision will be needed of housing specifically designed for older people, including those with special needs.
- 6.53 People with learning and physical disabilities form a proportion of the population and also need homes that can be adapted to meet their needs. The Council will seek the provision of an increased proportion of housing designed to the lifetime homes standard that can be readily adapted to meet the needs of older people and people with disabilities.

## **Housing Size**

- 6.54 The SHMA and other evidence show that the district has a high proportion of large dwellings in its housing stock. Longstanding trends and population forecasts show smaller average household size, including an increasing proportion of single person households. While the size profile of new dwellings will only lead to gradual change in the make up of the overall housing stock, increasing the proportion of small and small-medium sized units in new development will over time lead to a better balance between the housing stock and the size of dwellings needed.
- 6.55 The low proportion of smaller units in the housing stock also contributes to the very high average price of housing in the district. More small and small-medium sized units would lead to an increase in the proportion of relatively low cost market housing available to buy, assisting those who are just able to afford to buy on the open market. As well as single person households, this is particularly the case for small-medium sized family housing, including one and two bedroom flats and 2-2.5 bedroom houses. See appendix x housing affordability data.
- 6.56 For individual development schemes, the Council will take into account the range of dwelling sizes of market and social housing in the local area and of site specific factors, in considering the appropriate mix of dwelling sizes.

### **Policy SLP10 - Housing Size, Type and Mix**

All new housing development will contribute to a mix of different housing types in residential areas, taking into account the existing pattern of housing in the area, evidence of local need and site specific factors. It will in

particular seek the inclusion of more small and small to medium-sized housing, including one and two bedroom flats and 2-2.5 bedroom houses, in new development schemes in suitable locations, to increase the proportion of such sized units in the district housing stock, to widen choice and to provide more relatively low cost market housing available to buy. Floorspace, as well as room numbers and bedroom numbers, will be considered in judgments of relatively low cost market housing.

The Council seeks the provision of a reasonable proportion of housing designed to the lifetime homes standard that can be readily adapted to meet the needs of older people and people with disabilities.

Sheltered housing and extra care housing for older people and those with special needs will be encouraged on suitable sites in areas close to a range of services.

Further detail on requirements for appropriate housing size, type, mix and proportion of lifetime homes will be given in the DLP.

## **Housing Density**

- 6.57 The proposed development strategy for the district is based on a compact city approach through meeting future requirements by developing within existing settlements, particularly the City and towns, rather than extending into the Green Belt. This approach depends on using available sites within urban areas to their full potential, consistent with high quality design and environmental factors. Using land efficiently means that for each site development is optimised and less land in total is needed as a consequence to meet the district's development requirements, with beneficial effects for protection of the countryside.
- 6.58 Higher density development will only be appropriate in relatively accessible locations where residents will have good access to services.
- 6.59 In all cases, development will only be acceptable where schemes are well-designed and do not compromise the overall character of the area. The appropriate density for individual schemes will also be informed by taking account of the strengths, opportunities and constraints of the development site, including the characteristics of the surrounding area.

### **Policy SLP11 - Density of Housing Development**

All new housing will be developed at a density that is consistent with achieving high quality, sustainable design and which does not compromise the distinctive character of the area in which it is situated. Higher density

development in accessible urban locations with good access to services will be supported.

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.

6.60 The SLP now includes specific reference to the development of residential garden land (see below). Such development will also be considered against the plan as a whole, including the design policies.

Para 10.10 states that: Residential gardens are often a rich source of biodiversity, the value of which has been highlighted through the Environmental Capacity work. Residential gardens also play an important role in slowing down the flow of water, reducing flood risk and reducing the urban heat island effect. Close proximity to green space also has many social benefits including physical and psychological health benefits, social inclusion, education and sense of place. However, residential gardens have formed a large part of the Council's housing land supply for a long period of time and will continue to form some part in the future (the proportion of gardens lost by development can be an important factor when considering harm to the local area). When considered against policies in the Development Plan as a whole, where development of residential garden land would cause harm to the local area it will be refused.

Policy SL26 includes: When considered against policies in the Development Plan as a whole, where development of residential garden land would cause harm to the character and environment of the local area it will be refused.

## **St Albans Strategic Local Plan – Outline of History and Way Forward**

### **History**

The District Council is currently working on the preparation of the following Development Plan Documents (DPDs), which together will form the new statutory planning documents for the District, ultimately replacing the 1994 Local Plan:

- Strategic Local Plan (SLP) – overarching policies, principles and spatial vision. The level and location of sustainable development.
- Detailed Local Plan (DLP) – detailed policies; including site allocations, new proposals maps and comprehensive suite of policies.

Throughout the production of the St Albans Strategic Local Plan (formerly known as the Core Strategy) a number of key stages of developing the Strategic Local Plan have been considered.

### **Joint Issues and Options Consultation, May 2006**

The consultation document and summary can be viewed at [http://stalbans-consult.limehouse.co.uk/portal/planning\\_policy/jiocs/jioc0506/joint\\_io?pointId=project\\_9](http://stalbans-consult.limehouse.co.uk/portal/planning_policy/jiocs/jioc0506/joint_io?pointId=project_9)

### **Core Strategy Issues and Options, July 2007**

The consultation document can be viewed at [http://stalbans-consult.limehouse.co.uk/portal/planning\\_policy/csdpd/csio?pointId=project\\_16](http://stalbans-consult.limehouse.co.uk/portal/planning_policy/csdpd/csio?pointId=project_16)

The Proposed Changes version of the Regional Spatial Strategy (RSS) was published in December 2006 by DCLG following Examination in Public of the Draft RSS.

### **Emerging Core Strategy 2009**

This consultation document can be viewed at [http://stalbans-consult.limehouse.co.uk/portal/planning\\_policy/csdpd/ecs2009](http://stalbans-consult.limehouse.co.uk/portal/planning_policy/csdpd/ecs2009)

The final RSS was published by GO-East in May 2008.

### **Shaping Our Community, The Core Strategy: Consultation on the spatial strategy for locating future development in the District, Dec 2010**

This consultation can be viewed at [http://www.stalbans.gov.uk/Images/Shaping%20our%20Community%20-%20The%20Core%20Strategy%20-%20Consultation%20of%20the%20Strategy%20for%20Locating%20Future%20Development%20in%20the%20District%20-%20Final\\_tcm15-15350.pdf](http://www.stalbans.gov.uk/Images/Shaping%20our%20Community%20-%20The%20Core%20Strategy%20-%20Consultation%20of%20the%20Strategy%20for%20Locating%20Future%20Development%20in%20the%20District%20-%20Final_tcm15-15350.pdf)

This consultation followed Government announcements about the abolition of RSS's, and the introduction of localism and neighbourhood plans. The

consultation included a “bottom up” locally derived housing target which took into account a variety of factors including provision of infrastructure, provision of affordable homes and impact on the Green Belt. Considering these factors, a housing target of 4,250 between 2011 and 2028 was consulted up on (250 per annum).

### **Moving Forward**

Significant progress has been made with the Strategic Local Plan since the previous 2011 consultation and we are now in position to move forward to the Pre-submission publication stage (the stage before formal submission to the Planning Inspectorate for Examination in Public).

The process over the next few months is to report the Pre-submission draft of the Strategic Local Plan to Planning Policy Advisory Group (formerly known as PPAP), then to Cabinet and then for Full Council to approve the Pre-submission publication.

- PPAG meeting September 13, focusing on housing numbers and locations
- PPAG meetings September 19 and 24, looking at the full pre-submission document
- Cabinet, 18 October, to consider the pre-submission document
- Full Council, 28 November, to approve the pre-submission document
- Pre-submission publication, mid to late December

In addition, it is likely that there will also be reporting of the SLP to Local Services Scrutiny Committee, possibly to the 27 September meeting in order for it to be reviewed in advance of the October Cabinet.

To clarify the nature of the process, Pre-submission publication is not a public consultation in the usual sense of the term; rather it is a required statutory stage of the development of an eventual adopted SLP. The document is effectively the final draft. If significant change was required following the Pre-submission publication it would likely have to go through this stage once again.

It is an opportunity for the public/statutory stakeholders/other stakeholders to scrutinise/challenge the Pre-submission publication SLP document, testing it for ‘soundness’ and legal conformity against the NPPF and Planning Regulations. Representations related to the Pre-submission publication stage of the SLP Document are for a statutory 6 week period (though this may be extended if the timeframe extends over a holiday period).

Following pre-submission publication the indicative likely timetable through to formal adoption of the SLP is:

- Process comments received by March 2013
- Report comments and recommendations to Council March/April 2013
- Submit SLP to the Secretary of State in April/May 2013
- Commence Examination in Public in September/October 2013
- Adopt SLP in January/February 2014

Background work has already commenced on the DLP, but the timetable for its progress is wholly reliant on the progress with the SLP. It is likely that there will be progress through PPAG and Cabinet for a consultation document and consultation process in late 2013 or early 2014.

### **Key Factors For Consideration**

#### **National Planning Policy Framework (NPPF)**

Policies are being amended to take account of the NPPF. Additional evidence base is also being produced. A model policy will be introduced as recommended by PINS. NPPF key headlines:

- NPPF was published on 27 March 2012 and came into immediate effect.
- Planning Policy Statements, Planning Policy Guidance (PPS, PPG) and other government guidance have been deleted.
- A presumption in favour of sustainable development has been introduced
- The Green Belt is afforded significant protection, largely through repeating policies from the previous PPG2.
- The importance of getting a Local Plan in place is highlighted.
- Ability of LPA to set local policies is constrained by the need to meet requirements of the NPPF, which will be tested at examination.
- Significant implications including: sustainable economic development; housing; transport infrastructure; retail; heritage assets; duty to cooperate and decision taking.
- The NPPF contains competing policies and aspirations and it is unclear where the priority lies. This provides considerable uncertainty and provides significant scope for challenge and appeal. This is particularly the case in relation to the Green Belt in areas of high development demand.
- Duty to Cooperate - LPA's have to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts
- The operation of the NPPF will not be fully tested until applications, appeals and high court judgements are determined using it.

The test if a plan is "sound" is set out in the NPPF as:

- ***Positively prepared*** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- ***Justified*** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- ***Effective*** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- ***Consistent with national policy*** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

### Steve Quartermain Presentation (Chief Planner - DCLG)

- The Chief Planner outlined the implications of the NPPF and highlighted the urgency and importance of progressing the SLP.
- Ensuring that local policies are backed up by sound evidence was another key message.

### Delivering The Local Aspirations For Development

- As well as overarching policies setting out levels and locations of sustainable development, the new SLP will enable SADC to set a raft of other key new and updated policies. These include such important topics as infrastructure provision, affordable housing, Community, Sport and Recreational facilities and Green Infrastructure.
- Whilst there has always been development pressure in the district, there is clear evidence of more development pressure than at any other time since the first district local plan was adopted in 1985. Whilst the 1994 plan is still robust in many ways, it is logically certain that in the continued absence of a more up to date local plan, eventually some significant decisions would be made through ad hoc applications won at appeal. This would provide uncertainty for all and remove appropriate local control.

### Regional Spatial Strategy (RSS)

- The East of England Plan (EEP) has not yet been revoked. The Government is now updating the environmental reports and undertaking additional consultation in relation to the intended revocation of the EEP "In order to be meticulous in observing the requirements of the EC Directive".
- Baroness Hanham's recent announcement (July 2012) on the EEP revocation consultation advises that *'A local plan document must be in general conformity with the regional strategy at the stage that the plan is submitted for examination but it is open to councils when preparing local plans to take account of the policy to revoke up to the time of submission. Local authorities can also bring forward proposals (for example on housing targets) which have a local interpretation to them in their plans, based on their own sound evidence base where that is justified by the local circumstances. That evidence base is likely to be more up to date than that included in the Regional Strategies. Each case will depend on its particular facts.'*

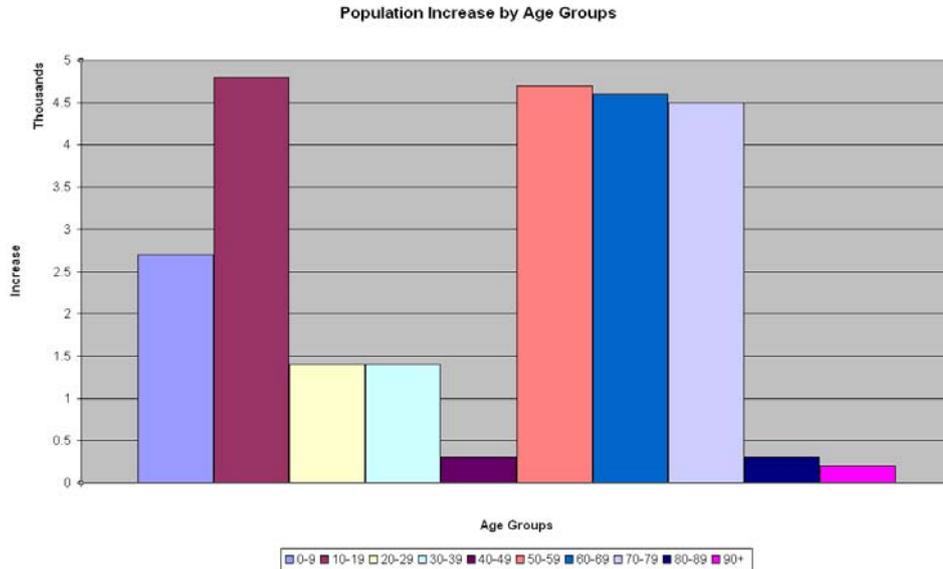
### CIL & S106

- The Government has introduced the Community Infrastructure Levy (CIL).
- CIL raises money from new development to help pay for local and strategic infrastructure.
- An up to date development plan is required to introduce a CIL charge.
- Local Planning Authorities should have CIL in place by April 2014 as from this date the Council will be very restricted in using S106 to leverage contributions from new development for community infrastructure.
- S106 will continue to be used for affordable housing provision.

## Appendix B – Statistical Information

### Age profile

The 2010 Sub National Population Projections show an increase in population of age groups between 50 and 79.



Hertfordshire County Council Data from Projecting Older People Population Information (POPPI) and Projecting Adult Needs and Services Information (PANSI) also show that there will be an increase in frail elderly people between 2010 and 2030.

| District Data:       | St Albans  |                 |                      |
|----------------------|------------|-----------------|----------------------|
| Population           | Now (2010) | 20 Years (2030) | Growth over 20 years |
| 65+                  | 20,700     | 29,100          | 40.6%                |
| 75+                  | 10,400     | 15,400          | 48.1%                |
| 85+                  | 3,000      | 5,600           | 86.7%                |
| Source: PANSI, POPPI |            |                 |                      |

### Housing Affordability

The SHMA shows that the district's workers earn less on average than those who reside in the district. Those who are employed in the district earn on average £28,031 whilst those resident in the district earn on average £34,096.

Figure 52  
**Comparison of Workplace and Residence Median Gross Annual Earnings in LCB West Sub-region in 2007 for Full-time Employees**  
 (Source: ASHE 2007)

| Local Authority | Employed in Area | Resident in Area |
|-----------------|------------------|------------------|
| Dacorum         | £27,866          | £28,065          |
| Hertsmere       | £25,605          | £29,782          |
| St Albans       | £28,031          | £34,096          |
| Three Rivers    | £36,133          | £34,298          |
| Watford         | £24,759          | £30,921          |
| Welwyn Hatfield | £28,633          | £27,785          |

The SHMA also shows that average property prices within the district are significantly higher than the national average.

Figure 85  
**Average Property Prices (third quarter 2008) (HM Land Registry)**

|                 | Detached | Semi-detached | Terraced | Flat/maisonette |
|-----------------|----------|---------------|----------|-----------------|
| Dacorum         | £529,423 | £330,750      | £237,382 | £166,810        |
| Hertsmere       | £609,687 | £338,159      | £286,126 | £224,041        |
| St Albans       | £653,420 | £379,989      | £312,720 | £219,423        |
| Three Rivers    | £578,574 | £308,637      | £290,103 | £233,656        |
| Watford         | £499,964 | £278,952      | £222,643 | £180,116        |
| Welwyn Hatfield | £508,100 | £303,400      | £215,100 | £171,300        |
| East of England | £346,300 | £241,000      | £180,400 | £152,200        |
| England & Wales | £345,400 | £196,300      | £177,700 | £198,900        |

The average earnings to house price ratio for St Albans is the highest in Hertfordshire and twice that of the national ratio.

Figure 87

Ratio of median house price to median workplace full time individual earnings by local authority compared to national and Hertfordshire averages (Source: CLG: table 577, housing research, housing statistics)

|                 | 1997 | 1998 | 1999 | 2000 | 2001 | 2002 | 2003  | 2004  | 2005  | 2006  | 2007  | 2008  |
|-----------------|------|------|------|------|------|------|-------|-------|-------|-------|-------|-------|
| England         | 3.54 | 3.67 | 3.86 | 4.21 | 4.47 | 5.07 | 5.83  | 6.58  | 6.81  | 6.91  | 7.26  | 6.94  |
| Hertfordshire   | 4.34 | 4.71 | 4.92 | 5.81 | 5.94 | 6.58 | 7.64  | 8.18  | 8.16  | 8.41  | 9.09  | 8.94  |
| Dacorum         | 4.28 | 4.72 | 5.00 | 5.86 | 5.77 | 6.02 | 7.19  | 7.78  | 8.27  | 8.00  | 8.19  | 8.87  |
| Hertsmere       | 5.01 | 5.22 | 5.74 | 6.39 | 6.96 | 7.36 | 9.89  | 8.99  | 10.30 | 10.17 | 10.64 | 10.49 |
| St. Albans      | 5.81 | 6.66 | 6.66 | 8.69 | 8.88 | 9.30 | 10.37 | 10.75 | 11.05 | 11.46 | 12.45 | 12.07 |
| Three Rivers    | 5.07 | 4.99 | 5.15 | 6.39 | 6.46 | 6.47 | 6.56  | 7.82  | 7.55  | 7.24  | 8.23  | 9.08  |
| Watford         | 3.16 | 3.70 | 3.95 | 4.68 | 5.05 | 6.13 | 7.40  | 7.68  | 7.26  | 7.60  | 9.41  | 8.67  |
| Welwyn Hatfield | 4.22 | 4.50 | 4.50 | 5.13 | 5.27 | 5.69 | 6.97  | 7.84  | 6.94  | 8.07  | 7.49  | 7.97  |

### Size, type and mix

Emerging evidence shows that there are more one and two person households in the district and therefore a need for smaller houses.

| Household size, All Households |               |               |
|--------------------------------|---------------|---------------|
| One person                     | 16,918        | 29.3%         |
| Two people                     | 21,925        | 37.9%         |
| Three people                   | 7,782         | 13.5%         |
| Four people                    | 7,662         | 13.3%         |
| Five or more people            | 3,513         | 6.1%          |
| <b>Total</b>                   | <b>57,800</b> | <b>100.0%</b> |

Emerging evidence

This correlates with the SHMA, (St Albans extract from fig 147 below) which shows that St Albans needs more 1 to 3 bedroom housing.

| Housing type | St Albans requirement to 2021 |
|--------------|-------------------------------|
| 1 bed        | 1400                          |
| 2 bed        | 2100                          |
| 3 bed        | 3000                          |
| 4 bed        | 500                           |
| 5+ bed       | -                             |

Extract from SHMA figure 147.

The emerging evidence supports that the majority of market housing built should be made up of 1-2 bed dwellings if the housing target is set at 250 dwellings per annum. This is because these types of market units will meet locally derived need for those on lower/medium incomes. The negative figure for four-beds implies that four bedroom dwellings are not needed. It can be seen that an increase in smaller size

dwellings is required. This is because of a historic shortfall in provision of smaller dwellings by the market.

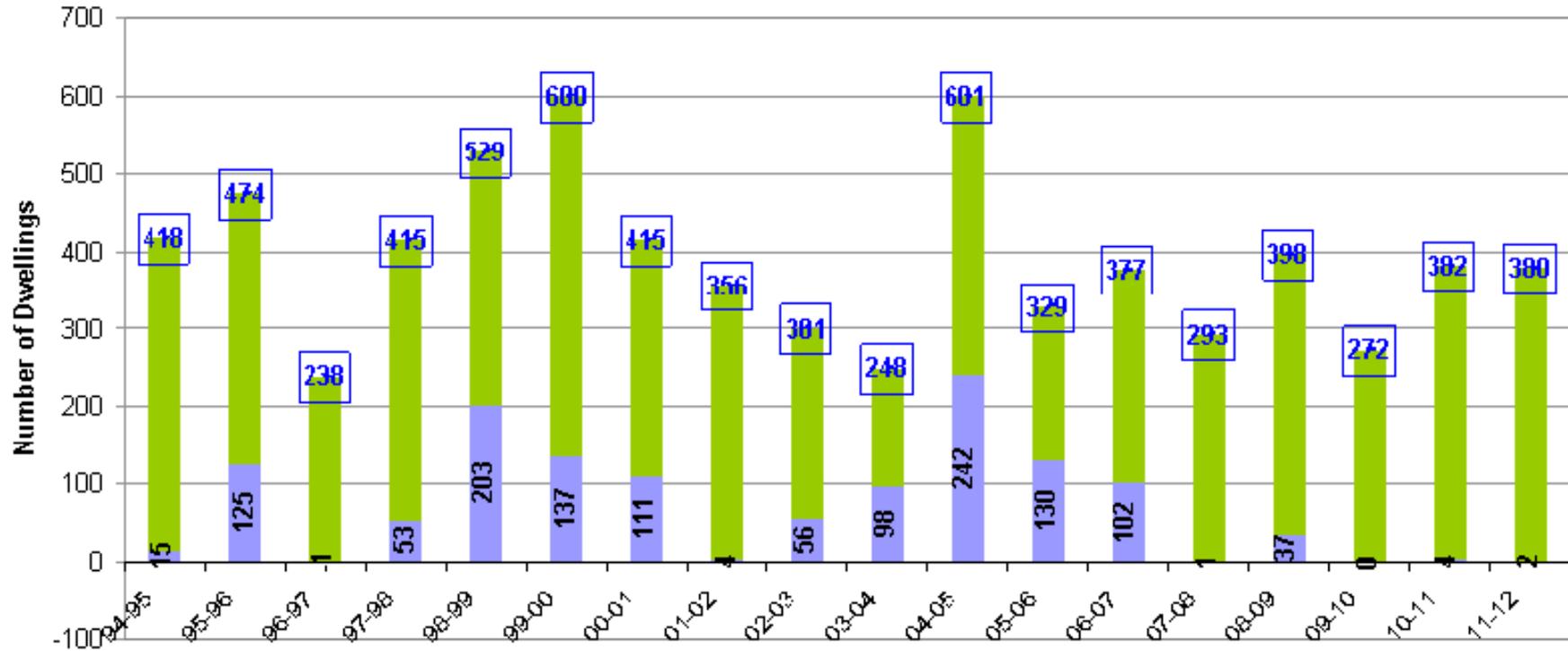
| Size of new market accommodation required in St Albans to 2028: 250 dwellings per year |                             |                          |                        |                             |
|--|-----------------------------|--------------------------|------------------------|-----------------------------|
| <i>Dwelling size</i>   | <i>Current size profile</i> | <i>Size profile 2028</i> | <i>Change required</i> | <i>% of change required</i> |
| One bedroom  | 3,724                       | 4,766                    | 1,042                  | 34.9%                       |
| Two bedrooms   | 11,314                      | 13,190                   | 1,876                  | 62.9%                       |
| Three bedrooms   | 19,543                      | 19,608                   | 65                     | 2.2%                        |
| Four or more bedrooms  | 14,945                      | 14,246                   | -699                   | 0.0%                        |
| <b>Total</b>   | <b>49,526</b>               | <b>51,810</b>            | <b>2,284</b>           | <b>100.0%</b>               |

Emerging evidence

### Diagrams from PPAG Report

From PPAG Report Page 10  
Past Housing Completions

■ Hospital Sites ■ Other Sites ■ Total



From PPAG report Page 12

Figure 149

Tenure Mix of Housing Requirement 2007 to 2021 by LA based upon prices at long term trends (Note: Figures may not sum due to rounding)

| Housing Tenure                   | Local Authority |              |              |              |              |                 |
|----------------------------------|-----------------|--------------|--------------|--------------|--------------|-----------------|
|                                  | Dacorum         | Hertsmere    | St Albans    | Three Rivers | Watford      | Welwyn Hatfield |
| Market housing                   | 4,800           | 400          | 400          | (400)        | 800          | 3,400           |
| Intermediate affordable housing  | -               | 2,700        | 5,300        | 2,300        | 2,100        | 500             |
| Social rented housing            | 3,100           | 500          | 1,300        | 700          | 600          | 2,800           |
| <b>Total Housing Requirement</b> | <b>7,800</b>    | <b>3,600</b> | <b>7,000</b> | <b>2,700</b> | <b>3,600</b> | <b>6,600</b>    |
| Market housing                   | 60.7%           | 11.3%        | 6.2%         | -            | 23.9%        | 50.8%           |
| Intermediate affordable housing  | -               | 75.9%        | 75.8%        | 77.1%        | 60.4%        | 6.9%            |
| Social rented housing            | 39.3%           | 12.8%        | 18.1%        | 22.9%        | 15.7%        | 42.4%           |

From PPAG Report Page 13

Figure 153

Summary of the Housing Requirement to 2021 by Local Authority, HMA and Sub-region based upon prices at long term price trends..

|  | Affordable Housing |              |            | Market Housing | All Housing |            |
|--|--------------------|--------------|------------|----------------|-------------|------------|
|  | Social Rent        | Intermediate | Total      |                | Smaller     | Larger     |
| <b>Local Authority</b>                 |                    |              |            |                |             |            |
| Dacorum                                | 39%                | -            | 39%        | 61%            | 44%         | 56%        |
| Hertsmere                              | 13%                | 76%          | 89%        | 11%            | 52%         | 48%        |
| St Albans                              | 18%                | 76%          | 94%        | 6%             | 50%         | 50%        |
| Three Rivers                           | 23%                | 77%          | 100%       | -              | 65%         | 35%        |
| Watford                                | 16%                | 60%          | 76%        | 24%            | 44%         | 56%        |
| Welwyn Hatfield                        | 42%                | 7%           | 49%        | 51%            | 38%         | 62%        |
| <b>Sub-Market</b>                      |                    |              |            |                |             |            |
| <b>Hemel Hempstead</b>                 | 36%                | -            | 36%        | 64%            | -           | -          |
| <b>St Albans</b>                       | 23%                | 73%          | 96%        | 4%             | -           | -          |
| <b>Watford</b>                         | 22%                | 52%          | 74%        | 26%            | -           | -          |
| <b>Welwyn Garden City and Hatfield</b> | 32%                | 15%          | 47%        | 53%            | -           | -          |
| <b>Overall Sub-region</b>              | <b>27%</b>         | <b>38%</b>   | <b>65%</b> | <b>35%</b>     | <b>48%</b>  | <b>52%</b> |

From PPAG Report Page 14  
 Annual Population Change Estimated and Projected (1991-2028)

