



St Albans City and District

**Housing Delivery Test
Action Plan 2022**

Contents

| | | |
|------|--|----|
| 1 | INTRODUCTION | 3 |
| 1.1. | Background..... | 3 |
| 1.2. | Purpose, Objectives and Status..... | 3 |
| 1.3. | Relationship to other plans/strategies and Council activities..... | 4 |
| 1.4. | Approach and methodology | 5 |
| 2 | LOCAL HOUSING MARKET | 6 |
| 2.1 | Property prices and affordability..... | 6 |
| 2.2 | Housing stock..... | 7 |
| 3 | HOUSING DELIVERY | 8 |
| 3.1 | Net additional dwellings completed | 8 |
| 3.2 | Council housing completions..... | 9 |
| 4 | REVIEW OF KEY ISSUES AND CHALLENGES..... | 11 |
| 4.1 | Planning process..... | 11 |
| 4.2 | Site availability | 11 |
| 4.3 | Review of key issues..... | 14 |
| 4.4 | Planning Performance..... | 15 |
| 5 | THE WAY FORWARD..... | 18 |
| 5.2 | Improved planning process and consistency in decision making | 18 |
| 5.3 | Working with neighbouring authorities | 21 |
| 5.4 | Build homes on Council owned land | 21 |
| 5.5 | Improve communications between agents and developers..... | 23 |
| 5.6 | Monitoring | 23 |
| 5.7 | Next Steps..... | 24 |

1 INTRODUCTION

1.1. Background

1.1.1 The Government introduced a Housing Delivery Test (HDT) as the mechanism to monitor housing delivery locally. The HDT measures net additional dwellings delivered against the homes the Government requires each Local Planning Authority (LPA) in England to deliver. The HDT is measured over a three year rolling period, starting in the financial year 2017/18. The Government issues results on performance for each LPA on an annual basis. The HDT has three requirements:

- If delivery has been less than 95% of the housing target, the LPA should prepare an Action Plan to address the reasons for the shortfall.
- If delivery has been less than 85% of the housing target, the LPA should also include a 20% buffer in calculating its 5 years housing land supply.
- If delivery has been less than 75%, the presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF) is also engaged.

1.1.2 The latest Housing Delivery Test results were published by the Secretary of State in January 2022. St Albans delivered 69% of the Government's target. In response to this, the Council has produced this Housing Delivery Test Action Plan responding positively to the challenge of increasing its housing delivery.

1.1.3 The delivery of new homes is a key national issue. In recent years, the Government has implemented numerous measures in an attempt to help stimulate and support home building, including ongoing reform of the planning system. Stimulating and supporting home building is particularly important in light of the current economic crisis.

1.1.4 This Action Plan has been prepared to show how the Council is responding to the challenge of ensuring that more homes are built in the District and faster. It has been prepared in accordance with the Government's Planning Practice Guidance¹. It analyses the reasons for the under-delivery of new homes against the Government's new requirements. It sets out clear actions to improve housing delivery within the District. This is an update to the second Housing Delivery Test Action Plan published in 2021.

1.2. Purpose, Objectives and Status

1.2.1. In line with the Government's Planning Practice Guidance, this paper: Briefly reviews the housing market;

- Identifies the reasons for under delivery;

¹ <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test--action-plans>



- Explores ways to reduce the risk of further under-delivery; and
- Sets out measures the Council intends to take to improve levels of delivery.

1.3. Relationship to other plans/strategies and Council activities

1.3.1. This Action Plan complements existing Council plans, policies and strategies which provide a framework for the delivery of the Council's housing priorities. This includes the following:

- **Plan making in the District**
Work is underway on a new Local Plan (2024-2041) for the District which will provide the framework for future housing and economic development across the District including the allocation of sites for development. In addition, the Council is working with its neighbouring authorities of Dacorum, Hertsmeire, Three Rivers and Watford to prepare a Joint Strategic Plan (JSP) for South West Herts for the time period 2036-2050.
- **Corporate Plan (2022-2027²)**
The Corporate Plan has a key priority to increase the delivery of social housing.
- **Housing Strategy (2023-2026³)**
The Strategy has been developed to set out how the Council will respond to the challenges in delivering and managing high quality housing across all tenures in the District in the next 3 years.

The adopted strategy was scrutinised at the November 2022 Housing & Inclusion Committee in regards to the number of responses received during the consultation period⁴. It is expected that the strategy will be discussed further during the Committee meeting in June 2023, where it is hoped that additional public engagement will reach a wider audience and gather additional responses.

The proposed pledges are to:

1. Deliver new housing on Council-owned sites that meet the needs of the social housing register
2. Promote sustainability and energy efficiency in housing stock of all tenures.
3. Ensure a sufficient supply of temporary accommodation
4. Support the delivery of a Local Plan to maximise the future delivery of affordable housing
5. Meet the accommodation needs of vulnerable people.

2

<https://www.stalbans.gov.uk/sites/default/files/attachments/St%20Albans%20City%20And%20District%20Council%20Corporate%20Plan%202022-2027%20web.pdf>

³ <https://www.stalbans.gov.uk/sites/default/files/attachments/SADC%20-%20Housing%20Strategy%202023-26.pdf>

⁴ <https://stalbands.moderngov.co.uk/ieListDocuments.aspx?CId=612&MId=10588&Ver=4>



1.4. Approach and methodology

- 1.4.1. The Action Plan has been informed by the council's Authority Monitoring Report (AMR), which reports the yearly housing delivery in the District.



2 LOCAL HOUSING MARKET

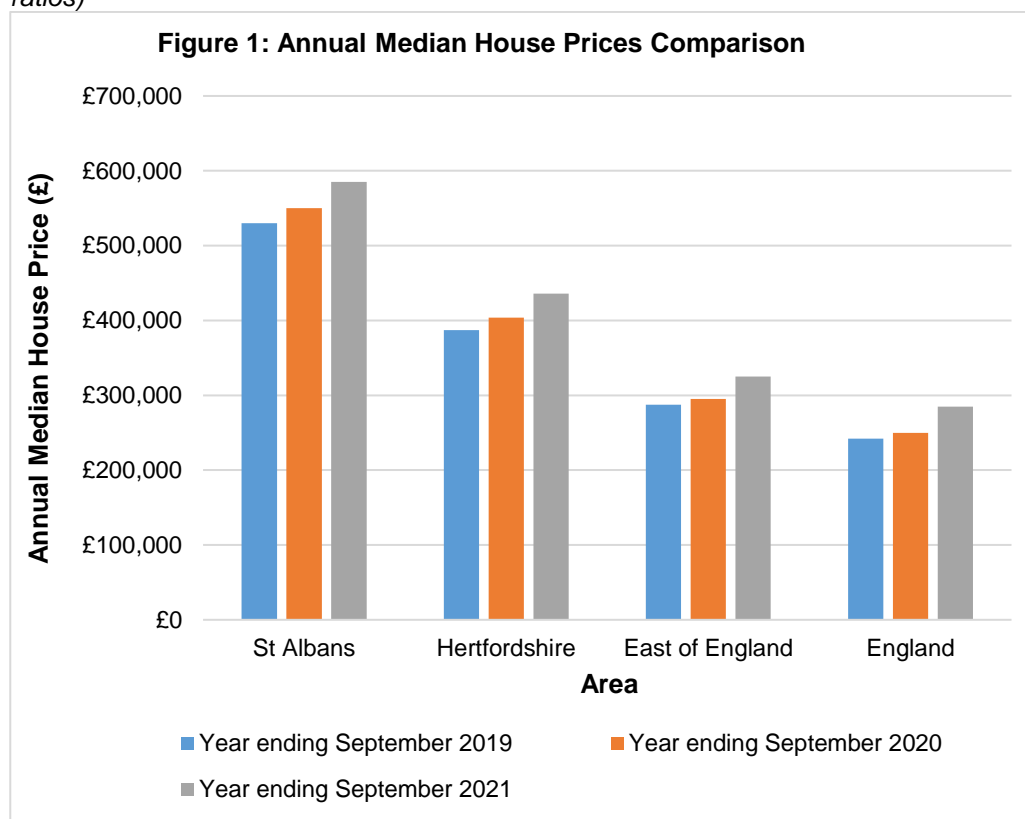
2.1 Property prices and affordability

2.1.1 The St Albans City and District area (the District) is an affluent district in the south east of England. It is within a Housing Market Area which includes its neighbours in the South West Hertfordshire area. St Albans District is a popular place to live in and was rated as one of the best in the South East in 2022⁵. The District is connected to London by fast rail links and has attractive features such as a rich fabric of historical buildings and good parks and other green spaces.

2.1.2 Reflecting its popularity, the median house price in the District in September 2021 was £585,000, an increase of £35,000 compared to September 2020. The lower quartile house price in September 2021 was £425,000, an increase of £20,000 compared to Sep 2020⁶.

2.1.3 Figure 1 below continues to show that the District has markedly higher house prices compared to the rest of Hertfordshire County, the East of England and England nationally.

Figure 1 - Comparison of annual median house price trends between end of September 2019 and end of September 2021 (source: ONS House price to workplace-based earnings ratios)



⁵ <https://www.thetimes.co.uk/article/why-st-albans-hertfordshire-best-place-to-live-uk-d8939mztd>

⁶

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearninglowerquartileandmedian>



2.1.4 The District's median house price to median earnings ratio in 2021 was 17.32, while the lower quartile house price to lower quartile earnings ratio in 2021 was 17.69.

2.1.5 The District's median gross annual workplace-based earnings in 2021 was £33,774, while the lower quartile annual workplace-based earnings in 2021 was £24,022.

2.2 Housing stock

2.2.1 The District's housing stock as at 2021 is 62,000 dwellings, an increase of 516 dwellings from 2020 (source: Table 125 published by DLUHC⁷).

⁷ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>



3 HOUSING DELIVERY

3.0.1 The adopted Local Plan for St Albans City and District is the District Local Plan Review (November 1994). Under the Planning and Compulsory Purchase Act 2004 the policies in the adopted Local Plan were automatically 'saved' for three years. Subsequently the Government agreed to some policies being saved for longer; effectively until they are replaced by a new Local Plan.

3.0.2 The Council monitors housing delivery through its annual Authority Monitoring Report (AMR) and uses a framework setting out core measures and indicators of progress on implementation of the Plan. In relation to housing, the core measures and indicators are shown in the following table.

3.1 Net additional dwellings completed

3.1.1 Since 1994/95 the District has delivered an average of 395 net dwellings each year, a slight reduction to the previous average of 397. There was an increase of delivery from large office to residential developments that were completed between 2018/19 and 2019/20. The average delivery over the past 5 years has been 455 net dwellings each year.

3.1.2 Table 1 shows the delivery history, including the delivery of affordable housing, since the Plan was adopted.

Table 1 – Authority's Monitoring Report 2022: Historic Affordable Housing Completions C3 Use Class (Net) Through District Local Plan Review 1994 Policies (1994/95 – 2020/22)

| Monitoring Year | Dwelling Completions (Net) | | | | Percent Affordable (%) |
|-----------------|----------------------------|--------------------|--------------|-------|------------------------|
| | Annual Total | Affordable Housing | | | |
| | | Policy 7A/8 | Other Policy | Total | |
| 1994/95 | 418 | 26 | 70 | 96 | 23 |
| 1995/96 | 474 | 125 | 45 | 170 | 36 |
| 1996/97 | 238 | 8 | 49 | 57 | 24 |
| 1997/98 | 415 | 35 | -41 | -6 | -1 |
| 1998/99 | 529 | 58 | 66 | 124 | 23 |
| 1999/00 | 600 | 32 | -7 | 25 | 4 |
| 2000/01 | 415 | 4 | 26 | 30 | 7 |
| 2001/02 | 356 | 44 | 20 | 64 | 18 |
| 2002/03 | 301 | 26 | 19 | 45 | 15 |
| 2003/04 | 248 | 0 | 7 | 7 | 3 |
| 2004/05 | 601 | 206 | 37 | 243 | 40 |
| 2005/06 | 329 | 18 | 10 | 28 | 9 |
| 2006/07 | 377 | 0 | 10 | 10 | 3 |
| 2007/08 | 293 | 17 | 19 | 36 | 12 |
| 2008/09 | 398 | 85 | 7 | 92 | 23 |



| | | | | | |
|--|---------------|--------------|------------|--------------|-----------|
| 2009/10 | 272 | 119 | 10 | 129 | 47 |
| 2010/11 | 382 | 102 | 13 | 115 | 30 |
| 2011/12 | 380 | 12 | 8 | 20 | 5 |
| 2012/13 | 320 | 75 | 30 | 105 | 33 |
| 2013/14 | 375 | 27 | -69 | -42 | -11 |
| 2014/15 | 313 | 8 | 62 | 70 | 22 |
| 2015/16 | 396 | 83 | 14 | 97 | 24 |
| 2016/17 | 340 | 38 | 21 | 59 | 17 |
| 2017/18 | 385 | 95 | 11 | 106 | 28 |
| 2018/19 | 624 | 71 | 11 | 82 | 13 |
| 2019/20 | 437 | 24 | 7 | 31 | 7 |
| 2020/21 | 516 | 177 | -8 | 169 | 33 |
| 2021/22 | 314 | 67 | 4 | 71 | 23 |
| Total (1994/95 to 2021/22) | 11,046 | 1,582 | 451 | 2,033 | ~ |
| Average per year (1994/95 to 2021/22) | 395 | 57 | 16 | 73 | 18 |

3.1.3 During the monitoring years 2020/21 and 2021/22 a total of 516 and 314 net C3 dwellings were completed respectively. Most of the development continues to be developed in St Albans City. This figure is lower than the figure calculated using the Government's standard methodology of 890 dwellings per annum. The latest Housing Trajectory shows a five year housing land supply of 2.0 years (including the 20% 'buffer' as required by the NPPF) as of 1 April 2022. The council cannot currently demonstrate a five year housing land supply.

3.1.4 A new Local Plan is being drafted, which is scheduled for public consultation during summer 2023. The new Plan will propose a significant increase to the delivery of homes to meet the District's housing need over the period 2024-2041. A new Local Development Scheme (LDS) was adopted in September 2022⁸ which sets out the timetable for preparation of the Local Plan. The Council also continues to progress the South West Herts Joint Strategic Plan, together with the four other Local Authorities, for the period 2036-2050⁹.

3.2 Council housing completions

3.2.1 There were no completions during 2021/22. Six Council-owned sites are in the pipeline for delivery as follows:

- Noke Shot Garages East, 35a and 35b Porters Hill, 46 Noke Shot and land rear of 38-40 Noke Shot, Harpenden - 10 new dwellings comprising eight 3-

⁸ <https://www.stalbans.gov.uk/local-development-scheme>

⁹ <https://www.stalbans.gov.uk/south-west-herts-joint-strategic-plan>



bed semi-detached houses and two 2-bed detached bungalows. Four dwellings are to be delivered for social rent.

- Civic Centre Opportunity Site (South), Victoria Street, St Albans – 93 apartments, of which 33 apartments will be delivered for social rent.
- Ridgeview Lodge, Barnet Road, London Colney – Redevelopment of a site as a hostel to deliver 44 apartments, of which 10 apartments are to be delivered for social rent.
- The Hedges, Woollam Crescent, St Albans - 12 dwellings comprising six 3-bed semi-detached houses and six 2-bed flats, following demolition of existing temporary accommodation. 12 dwellings will be delivered as social rent. The development will result in a net gain of two dwellings
- The King Offa PH, Norman Close, Wallingford Walk, St Albans – 14 dwellings, of which all are to be delivered for social rent
- Former Sopwell Youth Centre, Cottonmill Lane, St Albans – seven dwellings for market sale.



4 REVIEW OF KEY ISSUES AND CHALLENGES

4.0.1 Current delivery rates are below thresholds as set out in the Government's Housing Delivery Test guidelines.

4.0.2 In order to better understand the key factors influencing and driving the (lower than Standard Methodology) delivery rates the Council has gathered a range of evidence and views from key stakeholders involved in the planning and housing supply process. This evidence has been considered alongside direct knowledge of local sites, land and development activity. A number of key themes emerge from this and are considered below.

4.1 Planning process

4.1.1 Whilst there is a presumption in favour of sustainable development, the perception of some stakeholders is that individual planning decisions do not always reflect this, and that this can adversely affect housing delivery in the District.

4.1.2 Furthermore, anecdotal evidence from applicants and agents suggests that the process of agreeing developer contributions to affordable housing and infrastructure through legal agreements (Section 106 agreements) can delay delivery.

4.2 Site availability

4.2.1 Table 2 shows that the majority of development in St Albans District is on previously developed land (PDL). Development on PDL comprises 87% of gross dwelling completions between 2001/02 and 2021/22. This equates to an average of 392 gross dwellings per year on PDL and 57 gross dwellings per year on greenfield land.

Table 2 – Authority's Monitoring Report 2022: SACD Historic Dwellings Completions (Gross) on Previously Developed Land (2001/02 – 2020/21)

| Monitoring Year | Dwelling Completions (Gross) | | | Percent Previously Developed Land (%) |
|-----------------|------------------------------|------------|-------|---------------------------------------|
| | Previously Developed Land | Greenfield | Total | |
| 2001/02 | 371 | 21 | 392 | 95 |
| 2002/03 | 295 | 54 | 349 | 85 |
| 2003/04 | 267 | 25 | 292 | 91 |
| 2004/05 | 612 | 34 | 646 | 95 |
| 2005/06 | 368 | 11 | 379 | 97 |
| 2006/07 | 437 | 3 | 440 | 99 |
| 2007/08 | 317 | 22 | 339 | 94 |
| 2008/09 | 457 | 9 | 466 | 98 |
| 2009/10 | 327 | 3 | 330 | 99 |
| 2010/11 | 433 | 61 | 494 | 88 |
| 2011/12 | 413 | 55 | 468 | 88 |
| 2012/13 | 217 | 183 | 400 | 54 |



| | | | | |
|--|--------------|--------------|--------------|-----------|
| 2013/14 | 342 | 162 | 504 | 68 |
| 2014/15 | 321 | 77 | 398 | 81 |
| 2015/16 | 408 | 49 | 457 | 89 |
| 2016/17 | 358 | 46 | 404 | 89 |
| 2017/18 | 456 | 37 | 493 | 92 |
| 2018/19 | 677 | 62 | 739 | 92 |
| 2019/20 | 395 | 78 | 473 | 84 |
| 2020/21 | 526 | 78 | 604 | 87 |
| 2021/22 | 239 | 133 | 372 | 64 |
| Total 2001/02 to 2021/22 | 8,236 | 1,203 | 9,439 | ~ |
| Average per year 2001/02 to 2021/22 | 392 | 57 | 449 | 87 |

N.B. Previously Developed Land / Greenfield status not known for 1 dwelling (gross) in 2018/19, 2 dwellings (gross) in 2019/20 and 6 dwellings (gross) in 2021/22. Total (gross dwelling completions) differ for following monitoring years: 2018/19, 739 dwellings; 2019/20, 475 dwellings; 2021/22, 378 dwellings.

Sources: SADC and Hertfordshire County Council

- 4.2.2 Over 81% of the land in the District is Green Belt and this is a limiting factor in land available for development. Redeveloping brownfield sites provides its own challenges, such as clearance/ demolition and remediation costs which can make development less attractive to developers.
- 4.2.3 A windfall topic paper is being prepared to support the emerging new Local Plan. The paper will identify historic windfall delivery rates, consider previous evidence such as the draft Windfall Topic Paper 2020¹⁰. The paper will consider a series of options and provide a per annum figure for expected delivery of windfall homes.
- 4.2.4 The previous HDTAP reported a decrease in office floor space requirements by companies. Post Covid-19 trends show a mixed picture, with hybrid working starting to emerge as the norm. Whilst a need for office space therefore clearly remains, the future floor space requirements are yet to be established. An in-depth study to establish office floor space needs is being prepared jointly for local authorities in the South West Hertfordshire sub-area, and which will set out St Albans' needs.
- 4.2.5 An ONS economic survey¹¹ (January 2023) shows that the proportion of the UK's workforce using a 'hybrid model of working' increased by 6.8% compared to the previous year. At the same time there was a decrease of 9.5% of people 'working from home' as the workforce began returning after the Covid-19 restrictions.

¹⁰ <https://stalbans.moderngov.co.uk/documents/s50048193/PPC%20Dec%202020%20-%20Updated%20Draft%20Windfall%20Topic%20Paper.pdf>

¹¹

<https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/bulletins/businessinsightsandimpactontoeconomy/26january2023>



4.2.6 There can be site specific constraints which can cause delays in bringing forward development including:

- Complex landownership with multiple land parcels
- Viability and planning obligations
- Heritage constraints, e.g. conservation areas, listed buildings
- Land contamination
- Access to/ from the site

4.2.7 A combination of Covid-19 and the economic slowdown negatively affected housing delivery in 2022.

4.2.8 An ONS report¹² shows that between February 2020 and November 2022 there was an overall decline of -3.4% to all new construction work. A further breakdown shows a -28.9% decline in construction of new housing delivered by the public sector, contrasting with growth of 7.8% for construction of new housing delivered by the private sector. The report also indicated that, anecdotally, clients are delaying or cancelling work due to economic concerns, although fewer businesses are struggling in relation to materials costs.

4.2.9 In 2020, and as reported in the previous HDTAP, the Government introduced national measures in response to Covid-19. In a bid to stimulate the housing market, incentives were introduced such as the Stamp Duty Land Tax exemption and extension of the Help to Buy scheme. These measures aimed to support delivery in the short term and ensure resilience in the property market. This may have led to developers delivering more housing as during this period there was a higher delivery rate than in previous years. This higher rate of delivery was achieved despite the limited number of office to residential developments that added to supply in previous years 2018/19 and 2019/20. The Stamp Duty holiday ended in April 2021 and the Help to Buy Scheme (launched in 2013) ended in October 2022. Given that house prices are high relative to income, that interest rates are rising, and that government incentives which are aimed at developers and first time buyers are being withdrawn, there is likely to be further downward pressures on housing supply and delivery.

4.2.10 Much of the land in the District has high heritage and conservation value. There are over 800 listed buildings and 19 conservation areas. The District has a wealth of archaeology, ranging from internationally significant sites to those of more local interest. There are three types of protected archaeology within the St Albans District: Scheduled Monuments, Archaeological Sites for Local Preservation, and Archaeological Sites Subject To Recording Conditions. The District therefore has a distinctive landscape with significant landmarks and strategic views. The presence of these landscape and heritage characteristics places constraints on development opportunities for delivering new housing.

12

<https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/bulletins/constructionoutputingreatbritain/november2022>



4.3 Review of key issues

- 4.3.1 The national Planning Practice Guidance (PPG)¹³ sets out recommendations that local authorities can review as part of the Housing Delivery Test Action Plan. The details for reviewing key issues and challenges are set out in Table 3 below.

Table 3 – Areas suggested for review from the Planning Practice Guidance (PPG) and St Albans City and District (SACD) review

| <u>Planning Practice Guidance (PPG)</u> <u>Suggested areas for review</u> | <u>Analysis review of key issues – in St Albans City & District (SACD)</u> |
|--|--|
| Barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales. | There is no evidence that there are any significant barriers to early commencement in the District. |
| Barriers to delivery on sites identified as part of the 5 year land supply (such as land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.). | There is no evidence that there are any significant barriers to delivering sites that have obtained planning permission. |
| Whether sufficient planning permissions are being granted and whether they are determined within statutory time limits. | <p>The step-change in the Government's housing requirements can only be delivered through the adoption of a new Local Plan that will almost certainly require the council to release Green Belt. Until that time sufficient permissions to deliver an average of 890 homes per annum are not being granted. Planning applications are being determined in time in the very large majority of instances.</p> <p>The planning performance tables below show that the Council is meeting most of DLUHC's performance targets (with the exception of determinations for householder applications). Where it is shown that the average determination period is higher than the statutory determination target, this is likely due to the council requesting additional details / amendments – often in order to give a positive recommendation. In these instances Extensions of Time (EOT's) have been agreed.</p> |

¹³ <https://www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test-action-plans>



| <u>Planning Practice Guidance (PPG)</u> <u>Suggested areas for review</u> | <u>Analysis review of key issues – in St Albans City & District (SACD)</u> |
|---|---|
| Whether the mix of sites identified is proving effective in delivering at the anticipated rate. | There is no evidence that the mix of sites approved is negatively affecting delivery. |
| Whether proactive pre-planning application discussions are taking place to speed up determination periods. | The Council is undertaking proactive pre-planning application for all major development schemes. |
| The level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery. | <p>The Council undertook a 'call for sites' from 24 January to 8 March 2021. There was a good level of engagement with over 200 potential development sites having been submitted as part of this process.</p> <p>In addition, the Council has undertaken informal engagement with landowners, developers and agents on the Local Plan both at the beginning and the end of 2021.</p> <p>In August 2022, The Council contacted landowners regarding sites identified via the Urban Capacity Study, to explore potential for their land to be allocated in the draft Local Plan for housing delivery. This work is on-going to ensure that every opportunity is made to effectively contact landowners in regards to this process.</p> |
| Whether particular issues, such as infrastructure or transport, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable. | Infrastructure and transport have been addressed at the strategic level in work with HCC and with neighbouring and nearby authorities. |

4.4 Planning Performance

4.4.1 Tables 4 and 5 below shows the Council's performance and trend against Government targets.



Table 4 – Development Management performance against nationally set Department for Levelling Up, Housing and Communities (DLUHC) 2 yearly targets¹⁴

Colour coding for table: Green – performance above threshold.

| Measure and Type of Applications | Bigger or Smaller is Better | Performance In current 2 Year Assessment Period | Performance in previous 2 Year Assessment Period | DLUHC's current Thresholds and 2 Year Assessment Periods | |
|---|-----------------------------|---|--|--|--|
| Speed of major development (% determined in time) | Bigger | 78% (Oct 2021 to Dec 2022) | 81.7% (Oct 2020 to Sept 2022) | 60% (Oct 2019 to Sept 2023) | |
| Quality of major development (% overturned at appeal) | Smaller | 8.3% (Apr 2021 to Dec 2022) | 6.8% (Apr 2020 to Mar 2022) | 10% (Apr 2021 to Mar 2023) | |
| Speed of non-major development (% determined in time) | Bigger | 71% (Oct 2021 to Dec 2022) | 71.4% (Oct 2020 to Sept 2022) | 70% (Oct 2021 to Sept 2023) | |
| Quality of non-major development (% overturned at appeal) * | Smaller | 0.9% (Apr 2021 to Dec 2022) | 0.9% (Apr 2020 to Mar 2022) | 10% (Apr 2021 to Mar 2023) | |

* % of decisions overturned at appeal – appeal decisions are scrutinised by officers to inform future decision making.

Table 5 - Development Management performance against statutory determination periods¹⁵

| Application Type | Target | Average % in time FY 22-23 (so far) | Average % in time FY 21-22 | Average Oct – Dec 22-23 | Average July – Sept 22-23 | Average Apr – June 22-23 | Average Jan – Mar 21-22 |
|--------------------|------------------------------------|-------------------------------------|----------------------------|-------------------------|---------------------------|--------------------------|-------------------------|
| Major Applications | 13 weeks (national) 60% in time | 73% | 78% | 41.4 weeks | 44.1 weeks | 32.9 weeks | 37.8 weeks |

¹⁴ <https://www.gov.uk/government/publications/improving-planning-performance-criteria-for-designation>

¹⁵ <https://www.gov.uk/guidance/determining-a-planning-application#what-are-the-time-periods-for-determining-a-planning-application>



| | | | | | | | |
|--------------------------|-----------------------------------|-------|-------|------------|------------|------------|------------|
| Minor Applications | 8 weeks (national) 65% in time | 68.6% | 76% | 20.9 weeks | 15.5 weeks | 10.6 weeks | 11.8 weeks |
| Householder Applications | 8 weeks (national) 80% in time | 73.3% | 69.7% | 13.2 weeks | 10.7 weeks | 11.6 weeks | 10.6 weeks |



5 THE WAY FORWARD

5.2 Improved planning process and consistency in decision making

5.2.1 The Council recognises the importance of its planning service in enabling and supporting growth. It is committed to ensuring the delivery of an efficient and effective service. To successfully deliver the larger strategic sites, experienced Planning Officers are needed to process applications and address any issues or barriers raised by developers, landowners and residents. These will be especially needed as a new Local Plan is progressed.

5.2.2 The details for actions and responsibility for delivery are set out in Table 6 below:

Table 6 - Areas suggested for action from the Planning Practice Guidance (PPG) and St Albans City and District (SACD) actions and outcomes

| Suggested Actions from the Planning Practice Guidance (PPG) | St Albans City & District Action | Expected Outcomes | Key roles and responsibilities |
|---|--|---|---|
| Working with developers on the phasing of sites, including whether sites can be subdivided. | The Council will work on developing early work, including Masterplans where appropriate, to assist in the timely submission of planning applications on key emerging draft Local Plan sites. | It is expected that this would lead to the housing delivery targets being met during the new Local Plan period. | Strategy Policy and Transformation - Major Projects Team and Community & Place Delivery - Development Management Team |
| Offering more pre-application discussions to ensure issues are addressed early. | Review and improve S106 procedures including ensuring a consistent approach to negotiations, decision making and streamlining of internal processes. | It is expected that this would lead to the housing delivery targets being met during the new Local Plan period. | Community & Place Delivery - Development Management Team and Hertfordshire County Council |
| Considering the use of Planning Performance Agreements. | Continue to use and refine Planning Performance Agreements as a way of managing and resourcing larger and/or more complex schemes. This should include where appropriate a specific focus on ensuring efficient use of and | A reduction in the time taken for construction work to commence after permission has been granted. | Strategy Policy and Transformation - Major Projects Team and Community & Place Delivery - Development Management Team |



| Suggested Actions from the Planning Practice Guidance (PPG) | St Albans City & District Action | Expected Outcomes | Key roles and responsibilities |
|--|--|--|---|
| | then discharge of conditions to support quicker commencement on site. | | |
| Carrying out a new Call for Sites, as part of plan revision, to help identify deliverable sites. | Call for Sites carried out in early 2021 to support new Local Plan. | It is expected that this would lead to the housing delivery targets being met during the new Local Plan period. | Strategy Policy and Transformation (Planning Policy Team) |
| Revising site allocation policies in the development plan, where they may act as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies. | <p>The Council is continuing with preparation a new Local Plan.</p> <p>As part of this, site allocations will be revised and updated in line with the new Housing Economic Land Availability Assessment.</p> | <p>It is expected that this would lead to the housing delivery targets being met during the new Local Plan period.</p> <p>It is expected that densities would increase whilst keeping design quality.</p> | Strategy Policy and Transformation (Planning Policy Team) |
| Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use. | Annual monitoring and review of the impact of Article 4 directions (office to residential) to housing delivery rates on the Housing Trajectory. Office to residential Prior Approval permissions which are started, completed and yet to be completed are monitored annually in the Authority Monitoring Report. | The permitted development enabling conversion from office to residential use had resulted in a significant loss to office space within the District and gain of residential, even within the existing Article 4 areas. | Strategy Policy and Transformation (Planning Policy Team) |
| Engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how | Continue to monitor build out rates through annual monitoring survey and publish results through the Authorities Monitoring Report. | Ensures barriers to delivery can be identified and discussions held to enable development to progress. | Strategy Policy and Transformation (Planning Policy Team) |



| Suggested Actions from the Planning Practice Guidance (PPG) | St Albans City & District Action | Expected Outcomes | Key roles and responsibilities |
|--|---|--|---|
| these can be addressed. | <p>Engage with stakeholders on-site and make note of barriers to development (where development has stalled).</p> <p>To monitor on-site and review stalled development sites with the aim of supporting delivery.</p> <p>Engage and discuss delivery at least once a year with professional agents, including through regular Agents Forum.</p> | | |
| Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed. | Consider whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed. | Ensures that the Community & Place Delivery - Development Management Team can support future housing delivery and wider growth through ongoing service improvements. | Community & Place Delivery - Development Management Team |
| Ensuring evidence on a particular site is informed by an understanding of viability. | Now withdrawn draft Local Plan contains recent evidence work on viability which shows that viability is generally strong across the district. This will be updated as work on the new Local Plan is taken forward. | Ensures that when the site is put forward it is robustly assessed for viability that can be addressed at an earlier stage of development. | Strategy Policy and Transformation (Planning Policy Team) |
| Considering compulsory purchase powers to unlock suitable housing sites. | No current evidence to suggest CPO will boost delivery. Potential use of CPO will be kept under ongoing review. | | Community & Place Delivery - Development Management Team |
| Revisiting the Strategic Housing | A new Local Plan is being drafted. The | It is expected that this would lead to | Strategy Policy and |



| Suggested Actions from the Planning Practice Guidance (PPG) | St Albans City & District Action | Expected Outcomes | Key roles and responsibilities |
|---|--|--|---------------------------------------|
| Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development that could increase delivery rates, including public sector land and brownfield land. | HELAA was completed at the end of 2022. The Urban Capacity Study process is still on-going with letters sent to landowners to capture urban sites suitable for housing development | the housing delivery targets being met during the new Local Plan period. | Transformation (Planning Policy Team) |

Additional Actions

5.3 Working with neighbouring authorities

5.3.1 The Council is committed to working with neighbouring and relevant nearby authorities. For example it is working closely with Dacorum, Hertfordshire County Council, Hertfordshire Local Enterprise Board and the landowners with regard to a potential cross-boundary Garden Community at Hemel Garden Communities.

Actions

- Actively co-operate with neighbouring local authorities to identify and bring forward sites; including potential cross-boundary opportunities such as Hemel Garden Communities.
- Progress the emerging new Local Plan.
- Progress the SWH Joint Strategic Plan - to address the approach to the five LPA South West Herts area, including over the longer term 2036 to 2050.

5.4 Build homes on Council owned land

5.4.1 The Actions in relation to building on Council owned land are set out in the Housing Strategy 2023-2026 under Pledge 1. This sets out a number of proposed aims and measures, summarised below:

Actions

- Making best use of existing stock by:
 - Reviewing void properties in line with the Council's Disposal and Asset Management Strategy



- Identifying opportunities to increase the provision of adapted accommodation
- Working with the Planning department by:
 - Engaging with the Planning department to discuss any development. Exploring opportunities on Council owned sites to maximise new housing delivery
- Maximising funding opportunities to increase new house building by:
 - Undertaking regular meetings with Homes England to review funding streams to support social rented housing development
 - Undertaking a monthly review of the Housing Business Plan to monitor future expenditure and borrowing capacity
- Regularly assessing housing need in the district by:
 - Carrying out quarterly reports on the needs of applicants on the Housing Register
- Working in partnership to deliver new housing projects in the district by:
 - Having monthly Project Board meetings held internally to review project progress
 - Undertaking quarterly meetings of the St Albans Strategic Accommodation Board with Hertfordshire County Council
- Implementing a Housing Development Pipeline by:
 - Identifying and review a 5 year pipeline of garage sites to be developed (subject to viability)
 - Redeveloping Telford Court site when building fully vacant
- Getting the best value from our assets and develop modern new homes for the future by:
 - Completing an Energy Net Present Value exercise on Council stock to identify the viability of each dwelling
 - Identifying existing stock which could be repurposed to address housing need
- Implementing a Garage Management Strategy by:
 - Delivering a clear strategy that identifies future use of Council owned garage sites in the district
 - Identifying Garage Sites for redevelopment, refurbishment, or disposal
- Delivering an increased amount of family sized accommodation by:
 - Maximising the number of 2 and 3 bedroom houses on Council owned sites
- Exploring innovative means to address the housing crisis by:
 - Monitoring and identifying any local and national trends and responding to any relevant government consultation



Actions as set out in the Corporate Plan are:

2022-2027

- Complete the social housing development of 6x2-bedroom flats and 6x3-bedroom houses at The Hedges site, Woollam Crescent, St Albans
- Complete the social housing development of two 4-bedroom houses, eleven 3-bedroom houses, and one 2-bedroom bungalow at the former King Offa site, St Albans
- Complete development at the St Albans City Centre Opportunity Site (CCOS) South • 33 apartments for social rent • 60 apartments for sale • 6,064 sq metres of office space • 100 car parking spaces
- Progress feasibility study on 3 sites for future social housing development
- Continue to progress the redevelopment of Ridgeview in London Colney to provide a phase 2 development of 24 market rent apartments
- Continue to develop Noke Shot Garages, Harpenden to provide 10 new dwellings comprising 8, 3 bedroom semi-detached houses and 2, 2 bedroom detached bungalows. 4 dwellings are to be delivered for social rent
- Complete development on the former Sopwell Youth Centre, Cottonmill Lane, St Albans, to deliver 7 dwellings, which will be for sale at market rate

5.5 Improve communications between agents and developers

5.5.1 The Planning Department holds a meeting every six months with planning agents to discuss topics of mutual interest and these will continue.

Actions

- Continue with the Agents Forum to help identify what is needed to reduce barriers to delivery.
- Ensure that pre application meetings are actively promoted and carry out a satisfaction survey to identify any process improvements required.

5.6 Monitoring

5.6.1 A more active approach to monitoring the implementation of planning permissions is required. This is so that the Council can understand the reasons for any delay in bringing forward sites and take action to mitigate this wherever possible.

Action

- Review the outputs of the Compliance and Monitoring Officer to ensure delivery of housing is prioritised.



5.7 Next Steps

- 5.7.1 The actions set out above will be monitored and reviewed on an annual basis. Monitoring information will be collected from a variety of sources. This includes the Authority Monitoring Report, the Corporate Plan, Quarterly Returns, appeals monitoring and housing trajectory along with any other relevant documents.
- 5.7.2 The Council will continue to maintain a strong housing-related evidence base and set future goals for housing delivery to support increased housing delivery.

