



St Albans City & District Council Local Plan Examination – Week 4 - Matter 9

Land at London Road, St Albans

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Catesby Estates

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1 Introduction

- 1.1.1 This statement has been prepared by Stantec on behalf of Catesby Estates pursuant to Matter 9 'Housing Land Supply' of the St Albans City & District Local Plan Examination. This follows representations to both the Regulation 18 and Regulation 19 Local Plan consultations in relation to Catesby Estates' land interest at Land South of London Road, St Albans (labelled as Land East of Napsbury Lane within the HELAA). The site is labelled as SA-25-21 within the HELAA. Please note previous comments were made in the name of L&Q Estates, which has recently been purchased by Catesby Estates.
- 1.1.2 The main parcel of the site is located north of the London Road Cemetery, on land between London Road and Highfield Park Drive. This parcel has an area of 14.22 hectares, and is predominantly in agricultural use. The site is generally flat, with a very gentle fall from north to south. It has good and well established planting around its boundaries, and has a school (Samuel Ryder Academy) to the north and the built form of Birklands Park and New House Park to the west. The site is considered to have a capacity for approximately 300 dwellings in a sustainable location on the edge of St Albans.
- 1.1.3 The site also includes land to the south of the London Road Cemetery, and further land to the western side of London Road adjacent to the junction of London Road and the A414. Details of the site and proposals are set out in the Vision Document that supports the previous consultation responses.
- 1.1.4 The site remains immediately available and is considered suitable and deliverable.



2 Matter 9

2.1 Issue 1 – Total Land Supply

Q1: What is the most up-to-date position regarding the projected total supply of housing over the plan period?

- 2.1.1 The Council has issued a Main Modification version of the Plan on 29 September 2025. This confirms the plan period has been extended, with the start date of the plan period moving forwards from October 2024 to April 2024. As such, the plan period has extended by 6 months as discussed during the week 1 sessions.
- 2.1.2 The result of the increase in the plan period is that the housing need figure as calculated through the standard methodology is 15,045 (885 dwellings x 17 years). As noted within the text of Strategic Policy SP1, this is a minimum figure and should be considered as such by the Council.
- 2.1.3 Catesby Estates has concerns regarding how housing numbers are presented consistently and how Parts A and B of the draft Local Plan interact. The table below sets out the quantum of development for the categories of sites as listed within the proposed trajectory and compares this to the quantum of the sites from the Part B descriptions:

Category	Housing Trajectory	Part B Quantum
Hemel Garden Communities (within plan period only)	4,300	4,300
Broad Locations (250+ Homes)	3,920	4,336
Large Sites (100-249 Homes)	281	376
Medium & Small Sites (5-99 Homes)	847	937
Green Belt – Previously Developed Land	79	79
Sites Within Urban Settlements	43	43
Sites Within Urban Settlements (Urban Capacity)	828	823

- 2.1.4 There is a clear disparity between the two parts of the documents. Without a breakdown of delivery proposed from each individual site, an analysis into how this disparity has occurred cannot be undertaken.
- 2.1.5 This matter can be resolved if the Council could publish a site by site guide to delivery, rather than grouping sites into broader categories.
- 2.1.6 In other matters, Catesby Estates remain of the opinion, as set out within the week 1 Matter 2 Hearing Statements, that there are demonstrable circumstances that additional dwellings should be included within the Local Plan beyond the requirements set out within the standard methodology for calculating housing need.
- 2.1.7 To clarify, the South West Herts Local Housing Needs Assessment Update Final Report, March 2024 identifies a need for 802 affordable dwellings per annum, which totals 13,634 affordable dwellings across an extended 17 year plan period.
- 2.1.8 If 40% of the total 15,045 dwellings came forward as affordable, then that would provide 6,018 affordable units at an average of 354 affordable dwellings per annum. This is well below the identified need. Catesby Estates also provided evidence in their Matter 2 Hearing Statement that actual affordable provision in the period 2019-2024 was 22%.



- 2.1.9 The Local Plan will therefore create a clear shortfall in affordable housing compared to need, a position exacerbated by the increased plan period. As such, additional sites should be allocated to assist in much-needed affordable housing delivery. Land at London Road, St Albans can assist in meeting this shortfall.

Q3: Is the projected supply of housing justified and has sufficient land been identified to ensure that housing needs will be met, including an appropriate buffer to provide flexibility and allow for changing circumstances? If not, what modifications can be made to the Plan in order to make it sound?

- 2.1.10 The Council's trajectory as revised implies the Local Plan will provide 15,489 dwellings against a minimum target of 15,045 dwellings as calculated using the relevant standard methodology. This does allow an additional 445 dwellings above the minimum target, which represents a 2.6% increase.

2.2 Issue 2 – Five Year Housing Land Supply

Q1: What will be the five-year housing land requirement upon adoption of the Plan?

- 2.2.1 The plan period has been extended and now commences in April 2024. At present, the Council has not formally published data for completions for the year April 2024 to March 2025. It is therefore unclear of the status of the 381 completions set out within the 2024/25 column. As such, the five-year housing land supply should be calculated from a period where known data is available. The monitoring report does set out completions up to March 2024, and therefore April 2024 should be the current base date for calculating housing need. If this were the case, the table below sets out the five year housing land supply position, based on the data within the revised housing trajectory:

Year	Expected Completions	Local Plan Delivery Requirements
2024/25	381	300
2025/26	312	300
2026/27	420	630
2027/28	581	630
2028/29	651	630
<i>Total</i>	<i>2,345</i>	<i>2,490</i>

- 2.2.2 If calculated for the period of April 2024-March 2029, the Plan is expected to deliver 2,345 dwellings, whilst the stepped trajectory would require provision of 2,490 dwellings. This is a shortfall of 145 dwellings. The Council would only therefore be able to demonstrate a 4.71 year supply in these circumstances.

Q2: Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

- 2.2.3 As noted in the table above, the first five years of the plan period (April 2024 to March 2041) are expected to provide delivery of 2,345 dwellings against a target of 2,490.

Q3: What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?

- 2.2.4 Catesby Estates are concerned with regards the level of changes and assumptions within the housing trajectory. The trajectory has been updated ahead of the session regarding individual sites, and therefore must only be drawing down on the Council's own information. However, this evidence is not currently available for review ahead of the Hearing Sessions.

- 2.2.5 The general trend is that delivery at sites appears to have been brought forward, with no evidence underpinning these changes. The table below seeks to compare delivery rates in the housing trajectory as submitted to the Inspectorate and that published on 29 September 2025 as Main Modifications:

Site within Housing Trajectory		2026/27	2027/28	2028/29	2029/30	2030/31	Total
Hemel Garden Communities	Original	0	0	0	100	175	275
	Sept 25	0	0	0	100	175	275
Broad Locations (250+ Homes)	Original	0	0	0	0	0	0
	Sept 25	0	35	75	235	274	619
Large Sites (100-249 Homes)	Original	0	0	0	0	0	0
	Sept 25	0	0	0	50	100	150
Medium and Small Sites (5-99 Homes)	Original	0	0	0	152	264	416
	Sept 25	0	20	35	140	90	285
Green Belt – Previously Developed Land	Original	0	0	0	15	40	55
	Sept 25	0	0	0	0	0	0
Sites within Urban Settlements (HELAA)	Original	0	0	0	30	13	43
	Sept 25	0	0	0	0	0	0
Sites within Urban Settlements (UCS)	Original	0	0	0	185	286	471
	Sept 25	0	0	20	70	47	137
Total	Original	0	0	0	482	778	1,260
	Sept 25	0	55	130	595	686	1,466

- 2.2.6 The table above shows the original trajectory as submitted to the Inspectorate sought 1,260 dwellings in the time period 2026/27 – 2030/31 as shown. However, the new trajectory increases delivery on such sites to 1,466 dwellings. The biggest concern is the level of accelerated delivery on the Broad Locations, which has increased by 619 dwellings. Delivery is also 4 years earlier than originally considered. There is no evidence available to demonstrate why the Council has made these changes.

Q4: Where sites have been identified in the Plan, but do not have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?

- 2.2.7 The Council has not provided a site by site analysis of proposed housing delivery rates, rather the housing trajectory has combined assumptions for a number of sites based on their category, for example, all Broad Locations are shown as one rather than separated individually. As such, a more in-depth analysis on the likely success of delivery within the required timetable cannot be provided. The Council has not therefore published the evidence that underpins the assumptions on individual site delivery.

Q6: What are the implications if some of the larger sites, such as the 'Broad Locations' and sites associated with the HGC do not deliver as expected? Is there sufficient flexibility to ensure that the Plan will not become out of date?

- 2.2.8 Catesby Estates has set out in the table above that the delivery of Broad Locations has been brought forward by 4 years in the trajectory and there is no evidence available as to how these changes have been considered and justified.
- 2.2.9 However, the expectation that the Broad Locations will start delivering in 2027/28 is a dramatic change from the original trajectory. Without justification, the changes to delivery are a risk to the Council should there be any form of delay in either determining applications (including discharge of conditions) or commencement on site. A more optimistic trajectory leaves the Council vulnerable to under delivery in the early part of the plan period, and as such, increases the risk that the Council will not be able to demonstrate a five year housing land supply.
- 2.2.10 This is especially important given the stepped trajectory proposed. Catesby Estates has expressed concerns regarding the stepped trajectory. This scenario highlights why it is a risky strategy for the Council, as it will compound the delays to boosting the plan-led delivery of housing at rates below the housing need requirement and well below the new standard methodology rates.
- 2.2.11 To reiterate the point, the rationale behind the changes cannot be formally assessed given the lack of available documentation and data.

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