

16th October 2025

Stage 2 Hearing Statements – Matter 9

St Albans City & District Local Plan

On behalf of Lands Improvement Holdings & Lawes
Agricultural Trust

Contents

- Matter 7 – Residential Site Allocations
- Matter 9 – Housing Land Supply
- Matter 11 – Natural Environment

Stage 2 Hearings – St Albans City & District Local Plan

Weeks 4, 5 and 6 MIQ Response on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT').

1.1 Overview

This response to the Stage 2 Examination, weeks 4, 5 and 6 Matters, Issues and Questions (MIQ's) has been prepared by Urbanissta Ltd on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT') in relation to the Land at North East Redbourn ('Site').

1.2 The MIQ responses made in respect of weeks 4, 5 and 6 relate to:

- Matter 7 – Residential Allocations.
- **Matter 9 – Housing Land Supply.**
- Matter 11 – Natural Environment.

1.3 Assistance has been provided by Town Legal (TL) in preparing these representations.

1.4 We note that Main Modifications to the Regulation 19 version of the Local Plan have been published by St Albans City & District Council (StADC), and these have been considered in our representations below. The documents included within this MIQ response include:

- SADC-ED85A - Reg 19 Local Plan Part A - Main Mods (All modifications)
- SADC-ED85B - Reg 19 Local Plan Part B - Main Mods (All modifications)
- SADC-ED85C - Local Plan Table of Modifications

1.5 LIH is a strategic development company that acquires land and is the promoter partner of the Site owners, LAT. The Site has been deemed surplus to LAT's operational requirements and is available to provide longer term funding to support LAT. Together LIH and LAT seek to secure the release of the Site from the Green Belt for a residential led development scheme.

1.6 These MIQ submissions, supplement update and in some instances rely upon the material prepared and submitted at Regulation 18 and 19 stages of the draft Local Plan, as well as building upon MIQ submissions (oral and written) made for Matters 1 – 3 of the Examination before, during and after the Stage 1 hearing sessions. Submissions have also been made regarding the duty to cooperate (11th June 2025) and the St Albans City and District Council (StADC) Technical Consultation of August 2025 and Stage 2 Hearing Matters 1, 2, 3, 6 and 7. Collectively, these submissions in combination, are referred to in this MIQ Submission, as the LIH/LAT Submissions¹.

1.7 The Site is an omission site. A PPA has been agreed with StADC and an outline planning application is targeted for submission in January 2026. It is in a sustainable location, it is grey belt, capable of meeting the 'Golden Rules' as defined by the NPPF (2024). It has been accepted as such, by StADC in a pre-application response dated 23rd May 2025 who concluded:

"it is considered that the site would be likely to constitute grey belt as defined in the NPPF, and may be capable of meeting the Golden Rules requirements..... the planning policy context has changed significantly since our previous discussions and there is greater potential than was previously the case for the proposal to be considered acceptable in principle."

1.8 The Site is not in the National Landscape (NL), or in the setting of the NL. It is located on an eastward facing slope facing away from the NL and is over 2.5km from the NL boundary. Visibility testing has confirmed that the Site and proposed development would not be visible from the NL and therefore would not affect the setting of the NL. The Site lies toward the edge of the 12.6km Ashridge Commons and Woods buffer and will provide its own SANG as mitigation for any potential impacts arising.

¹ LIH/LAT Submissions:

- Regulation 19 - St Albans Technical Submission - Final Draft - 7th November 2024 and associated material listed in paragraph 2.1 & 2.4 p8;
- Regulation 18 - St Albans Technical Submission - Final Submission - 25th Sept 23 and associated material listed in paragraph 1.6 p8 and the Identified Sites Deliverability Assessment (September 2023).
- Town Legal Letter to StADC 18th June 2024
- Appendix 3 - Green Belt Appraisal & Landscape Analysis 07 November 2024
- MIQ's Submissions Matters 1, 2 and 3 – 14th April 2025.
- Hearing Statement 11th June 2025 on Duty to Cooperate
- LIH Submission to the St Albans Technical Consultation - 18th August 2025 FINAL DRAFT
- Stage 2 MIQ Submissions Matters 1, 2, 3, 6 and 7 – 26th September 2025
- Oral submissions Stage 2 Hearings Matters 1 – 3 - 14th October 2025.

Stage 2 MIQ's

Lands Improvement Holdings & Lawes Agricultural
Trust

Matter 9

Housing Land Supply

Matter 9 – Housing Land Supply

Hearing Day 13: Thursday 6 November 2025
 Afternoon Session – 14:00 – 17:30
 1) Matter 9 – Housing Land Supply
 Issues: Total Land Supply and Five-Year Housing Land Supply
Attendance
 Deadline: 17th October 2025

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?

- 1.9 As at the time of making these MIQ responses, we note that StADC has produced some suggestions on Main Modifications to the draft Local Plan for the Inspectors consideration. We understand that it will be the Inspectors who will set out the Main Modifications required to make the draft Local Plan sound.
- 1.10 The StADC suggested Main Modifications to the draft Local Plan include:
- Table 3.2 (Housing Trajectory) has been published in SADC-ED85A - Reg 19 Local Plan Part A - Main Mods (All modifications);
 - SADC-ED85B - Reg 19 Local Plan Part B - Main Mods (All modifications); and
 - SADC-ED85C - Local Plan Table of Modifications.
- 1.11 We refer to StADC submissions to Matters 1 – 7 of the Stage 2 Hearings. The final drafting of this MIQ submission also post-dates the EiP Stage 2 Matters 1 – 3 Hearing session on the 14th October 2025 and our MIQ response is also informed by this.
- 1.12 In terms of the suggestions on Main Modifications to the draft Local Plan (SADC-ED85A – C), we note in summary that:
- Table 3.2 of SADC-ED85A indicates that **10,298** dwellings will be delivered from Part B site allocations.
 - SADC-ED85B indicates that **10,894** dwellings are to be delivered by allocated sites at Table A1.1.
 - This results in a **596 dwelling** unexplained anomaly.
 - In Table A1.1 (p1 SADC-ED85B) the 'Site Category' dwelling contributions are different in many instances to those provided in Total column (far right) of Table 3.2 (SADC-ED85A).
- | | Table A1.1(p1 SADC-ED85B) | Table 3.2 (SADC-ED85A) | Difference |
|---------------------------|---------------------------|------------------------|------------|
| Broad Locations | 4,336 | 3,920 | 416 |
| Large Sites | 376 | 281 | 95 |
| Medium & Small Sites | 937 | 847 | 90 |
| Green Belt PDL | 79 | 79 | / |
| Urban Settlements (HELAA) | 43 | 43 | / |
| Urban Settlements (UCS) | 823 | 828 | 5 |
- We are unclear why these numerical differences exist? What is the assumed supply from sources? Which document has the correct figures?
 - With regard to the proposed change to the stepped trajectory we address this matter in detail below.
 - The estimated annual average delivery rate is identified in Table 3.2 of SADC-ED85A as **758 dwellings**. No explanation has been provided for the insertion or basis for this element either.

Stepped Trajectory (Pre Adoption Period)

- 1.13 Following the Stage 2 Hearing on the 14th October 2025, we understand that the Inspectors will be issuing a further agenda and potentially additional MIQ's in respect of the stepped trajectory issues for consideration at the Matter 9 HLS session on the 6th November. Consequently, we reserve our right to make such further comments (in writing or orally) on this matter as may be required
- 1.14 StADC's suggested Main Modifications in Table 3.2 of SADC-ED85A and also StADC's Matter 2² submission include a 'step' in the pre-adoption period (i.e. April 2024/March 2025 and April 2025/March 2026) in effect years '0' and '1' from 389 dwellings per annum as per the Regulation 19 draft Local Plan to a reduced rate of 300 dwellings per annum. A figure which is lower than the actual completion rates and average for the District over the past 30 years.
- 1.15 StADC's express intention (StADC Matter 2² submission and orally at the 14th October 2025 EiP hearing) for proposing the 300-figure for the pre-adoption period ('years 0 and 1') is to avoid failing the sub-75% Housing

² StADC's Matter 2 - Issue 1.1 – Appendix 2 Housing Trajectory – Amended Housing Requirement Pre-adoption

Delivery Test (HDT) set out in footnote 8 of the NPPF (2024), which may otherwise trigger the ‘tilted balance’ in paragraph 11(d)(ii) of the NPPF (2024).

- 1.16 The PPG guidance on when a stepped housing requirement³ is appropriate in principle:

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

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

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

- 1.17 Paragraph 5 of the StADC’s Matter 2² submission sets out the way StADC propose (to the Inspector’s) that the draft Local Plan could be modified in SADC-ED85A – C). Paragraph 6 of the StADC’s Matter 2² submission then provides extracts from the HDT rule book⁴ which states:

“Changes to the housing requirement

16. Any new housing requirement will be used for the calculation of the Housing Delivery Test from the date that it becomes part of the development plan.

17. For the purposes of calculating the Housing Delivery Test, the new adopted housing requirement will apply from the start of the relevant plan period (set out in the strategic policies for housing), which may be earlier than the adoption of the strategic policies.

18. Following adoption of new strategic policies, the new housing requirement figure can be used to recalculate the Housing Delivery Test results during the year, in collaboration with MHCLG.”

- 1.18 Such a proposed figure is arbitrary and patently illogical as the 300-dwelling figure is less than the actual completion rates achieved in the requisite period which are identified as being net 381 dwellings and a forecast figure for 312 dwellings in SADC-ED85A.

- 1.19 StADC’s AMR⁵ indicates that the average completion rate during the period 1994/1995 – 2023/2024 were 396 dwellings per annum. The rate of 421 dwellings per annum is the average rate for the period (2019/2020 to 2023/2024). It would seem clear that any rate for the pre-adoption period should reflect at least the past trend average.

- 1.20 StADCs open position at the EiP⁶ hearing was that the 300-dwelling figure is intentionally to manipulate the HDT test to avoid falling foul of the sub-75% HDT test in footnote 8 of the NPPF which may trigger the “tilted balance”⁷ for development management purposes in paragraph 11(d)(ii) of the NPPF. This is an inappropriate and unjustified attempt by StADC to directly frustrate and circumvent the Government’s HDT policy for development management purposes.

- 1.21 The clear purpose and intent of the Government’s HDT policy in the NPPF (2024) is to potentially engage the tilted balance where (for development management purposes) failure of the HDT (assessed by a score of less than 75% of the housing requirement over the previous three years) for poorly performing LPAs is to ensure and to incentivise such LPAs to catch up with delivery. Such an arbitrary and artificial manipulation of the proposed stepped trajectory would also undermine the application of the Government’s ‘grey belt’ policy in the NPPF (2024).

³ Paragraph: 012 Reference ID: 68-021-20190722. Revision date: 22 07 2019

⁴ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book> (12th December 2024)

⁵ Table 2 SADC/ED71 (AMR 2024)

⁶ Matters 1 – 3 discussions 14th October 2025

⁷ NPPF paragraph 11d(iii) including footnote 8

- 1.22 Contrary to StADC's position stated at the EiP⁵, in a scenario where a HDT result was below 75% and the tilted balance potentially engaged (pursuant to footnote 8⁶) then they would not be 'at the mercy' of speculative Green Belt applications as they suggest as footnote 7⁸ deactivates the tilted balance for "land designated as Green Belt" unless a scheme is "grey belt and not inappropriate development".
- 1.23 As such, and for development management purposes, for the tilted balance to apply under paragraph 11(d)(ii) a site must fall within the grey belt definition (i.e. which is not to strongly contribute to green belt purposes (a), (b) and (d) and where such applies, there is no footnote 7⁸ restriction) and be paragraph 155 NPPF (2024) compliant. Then and only then, would the tilted balance be engaged.
- 1.24 This will only apply to some sites and would not in any way (as is alleged by StADC or at all) undermine the effectiveness of the draft Local Plan if adopted. North East Redbourn is one such sustainable grey belt site and an artificially manipulated stepped trajectory should not prevent such not inappropriate sustainable grey belt development sites from coming forward which would be the likely outcome If the StADCs proposal was accepted applying footnote 56 of the NPPF (2024).
- 1.25 By StADC proposing to artificially reduce the stepped trajectory for the pre-adoption period in an adopted Local Plan, this would be effectively preventing "grey belt" sites from coming forward as they would be unable to demonstrate the paragraph 155(b) criteria to demonstrate unmet need.
- 1.26 This is directly contrary not only to the express wording of the NPPF (2024) but also to the Government's clear policy intent in introducing the flagship Grey Belt policy as set out in July 2024 consultation on the new NPPF when it stated (among other things) that the new national policy tool was:
"To deliver the homes and commercial development this country needs, we are proposing the targeted release of grey belt land"⁹... and
"to ensure that in the short term we are best supporting the delivery of housing need, in advance of local planning authorities getting updated Local Plans in place and Green Belt reviews underway, we also propose changes that support the release of Green Belt land outside the plan making process. We propose to insert a new paragraph in the NPPF which will make clear that, in instances where a local planning authority cannot demonstrate a 5-year housing land supply or is delivering less than 75% against the Housing Delivery Test, or where there is unmet commercial or other need, development on the Green Belt will not be considered inappropriate when it is on sustainable 'grey belt' land, where golden rules for major development are satisfied, and where development would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole"⁹...
- 1.27 This is particularly pertinent for a draft Local Plan being prepared under the NPPF (2023) and pursuant to the transitional arrangements in the NPPF (2024). It is also particularly relevant in respect of a longstanding underperforming authority with a 30-year history of under delivery of housing; significant issues of affordability; and high levels of housing need. It should also not be forgotten that the NPPF (2024) requirement of 1,660 dwellings per annum is double that of the NPPF (2023) (of 885 dwellings per annum).
- 1.28 The provisions paragraph 236 to the NPPF (2024) are also most pertinent in respect of the need to commence an immediate review if the housing requirement is less than 80% of the NPPF (2024) requirement. The planned for requirement of 885 dwellings per annum is just 53% of the NPPF (2024) requirement of 1,660 dwelling per annum...
- 1.29 Such an artificial and arbitrary approach put forward as an intentional ploy to circumvent clear national policy on development management which surely cannot be a sound, justified or an effective basis on which to prepare the draft Local Plan and it is plainly inconsistent with national policy.
- 1.30 North East Redbourn is a sustainable site that meets 'grey belt' criteria as StADC themselves have agreed in pre-application engagement. It and other such sites should not be prevented from coming forward under the

⁸ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

⁹ Chapter 2 Paragraph 5 and Chapter 5 Paragraph 19 on Allowing Development on the Green Belt through Decision Making as set out in July 2024 consultation outcome on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system' Updated 27th February 2025.

<https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

development management process through the application of the clear national policy framework by an artificially reduced and manipulated stepped trajectory. This is a plain and self-evident misuse of the stepped trajectory tool. This is particularly prevalent, given StADC's evidence for Matter 6¹⁰ which suggests that their windfall assumptions would be substantiated by delivery on several grey belt sites, one of such sites being, North East Redbourn.

General concerns is respect of a stepped trajectory

- 1.31 StADC suggested Main Modifications for the stepped trajectory¹¹ that have been prepared for the Inspector's consideration, include a trajectory for the first 5-years of the plan period of 630 dwellings per annum, this varies from the 710 dwellings proposed in the Regulation 18 version of the draft Local Plan and the 485 dwellings set out in the Regulation 19 version of the draft Local Plan.
- 1.32 More generally, the inclusion of a stepped housing requirement for a draft Local Plan being prepared under the 'old' NPPF (2023) is in principle considered unjustified as it will (in summary):
- compound delays in boosting the plan-led delivery of new homes in St Albans.
 - result in a shortfall against the previous (2023) Local Housing Need (LHN) figure.
 - increase the shortfall if actual delivery falls below the stepped housing requirement.
 - be unnecessary as the Local Plan, if adopted, will already benefit from the transitional arrangements as set out in Annex 1 of the December 2024¹².
- 1.33 No clear basis or justification for the amendments and revised assumptions that underpin the stepped proposals for any of the draft Local Plan periods have been clearly provided. Further clarification is required, for soundness.

Early Review Mechanisms

- 1.34 Given that the draft Local Plan is being prepared under the NPPF (2023), the transition arrangements¹² of NPPF (2024) will apply following adoption. It should also be noted that StADC advised to members at Planning Policy Committee when seeking to agree the draft Local Plan for submission in 2024¹³ that it is to be reviewed '*day one after adoption*'. The stepped trajectory should be 885 dwellings from the point of adoption, given the anticipated transition needed to the NPPF (2024) housing requirement of 1,660 dwellings per annum.
- 1.35 StADC itself in its submissions on Matter 6¹⁴ also indicate that "*As set out in the NPPF 2024, There is the expectation that both Councils would commit to an immediate review of the Local Plan, following adoption.*" Suggested Main Modification (SADC/ED85A and C) indicates that this would be '12 months from adoption'. It is our contention that the review should be immediate and 'on day one' following adoption given the scale of the housing pressure facing the authority. Suitable sanctions and scrutiny provisions should apply to mitigate the position, should any immediate action on the review, not transpire.
- 1.36 To achieve this, more sites should be allocated in the draft Local Plan, and the development management route should not be artificially disapplied in respect of sustainable 'grey belt' sites capable of achieving the Golden Rules when there is an overarching national need as well as substantial local unmet need driving the basis for significantly boosting the supply of housing.
- 1.37 StADC acknowledge in submissions on Matter 6¹⁵ that there is "*clear evidence of additional housing land supply coming forward at the current time in the context of 'grey belt...'*" North East Redbourn is listed as one of the grey belt sites, capable of providing circa 1,000 new homes, infrastructure and its own SANG.
- 1.38 We note the amended Trajectories for sites H1, H2 and H4 provided in StADC submission on Matter 6¹⁶ and on this and more generally, to reiterate, we reserve our right to make further comments on the proposed stepped trajectory when the agenda and/or further MIQs are released and following the site-specific hearing sessions on HGC and other allocated sites.

Q2 What is the windfall allowance based on and is it justified?

- 1.39 The LIH/LAT Submissions¹ show that insufficient evidence and justification have been provided to support the windfall allowance in the draft Local Plan.

¹⁰ Matter 6 - Issue 6.5 – Appendix 1 - Housing Trajectory - Additional Homes Context

¹¹ SADC-ED85A – C and StADC MIQ response Matter 2 - Issue 1 – Housing Requirement

¹² Annex 1 - paragraph 231 to 243 NPPF (2024)

¹³ StADC Planning Policy Committee September and November 2024 (as summarised in LIH Regulation 19 submissions)

¹⁴ paragraph 5.12 Matter 6 - Issue 6 – Viability and Deliverability

¹⁵ paragraph 5.11 Matter 6 - Issue 6 – Viability and Deliverability and duplicated in Matter 6 - Issue 6.5 – Appendix 1 - Housing Trajectory - Additional Homes Context

¹⁶ Matter 6 - Issue 6.4 – Appendix 2A - SADC HGC Trajectory - H1, Matter 6 - Issue 6.4 – Appendix 2B - SADC HGC Trajectory - H2, Matter 6 - Issue 6.4 – Appendix 2C - SADC HGC Trajectory - H4

- 1.40 We note that in StADC submission on Matter 6^{9, 14, 15} North East Redbourn is noted to be a potential grey belt windfall site which has the potential to 'plug a gap' that might occur should HGC (or other large, allocated sites) not deliver as anticipated.

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?

- 1.41 Consistency (or clarity) between the assumptions of Part A and Part B of the Plan should be addressed. LIH/LAT Submissions¹ have previously shown the scale of anomalies that exist in the Council's housing land supply position are significant and this is further demonstrated in this MIQ response.
- 1.42 StADC's housing land supply position is still inadequately explained and poorly justified. A series of constrained sites have been identified with unrealistic delivery assumptions.
- 1.43 Additional site allocations are needed for sustainable 'grey belt' sites such as North East Redbourn, to ensure that a suitable and sufficient housing land supply position can be maintained.
- 1.44 Overview of key amendments and concerns in respect of the trajectory and steps, include:
- A range of mathematical anomalies.
 - The past and estimated completions for 2024/2025 and 2025/2026 are at a reduced stepped rate from the Regulation 19 draft Local Plan figure of 389 dwellings. Reference to a 'stepped rate' should be removed.
 - Table 3.2 of SADC-ED85A indicates that the stepped trajectory be amended for the first 5-year period to **630 dwellings** per annum (from 485 dwellings per annum in the Regulation 19 plan and 710 dwellings in the Regulation 18 Plan). No robust evidence has been provided for this change.
 - In principle an increase in the step is welcomed, but as set out above, any steps for a draft Local Plan prepared under the NPPF (2023) will merely result in a shortfall of delivery below LHN.
 - The housing requirement is 885 dwellings per year as soon as practicable.
 - We note the increase in anticipated provision but again suggest that greater ambition is possible in the HLS land supply/Trajectory position and via the allocation of more sites, the **885 dwelling target** might realistically achieved (not least given the aspiration of the NPPF (2024) and requirement for an immediate on adoption¹²).

Issue 2 – Five-Year Housing Land Supply

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

- 1.45 The LIH/LAT Submissions¹ show that the five-year housing requirements should be 885 dwellings per annum for five years so, 4,425 dwellings. This could be achieved through additional sustainable site allocations of sites such as North East Redbourn.
- 1.46 We note that in SADC-ED85A the suggested Main Modification to Policy SP1a) indicates a total provision of 3,645 dwellings in the 7-year period. This is based upon an unsubstantiated increased step of 630 dwellings for the period post adoption and for the pre-adoption period a spurious stepped figure of 300 dwellings for the years 2024/2025 and 2025/2026. We consider this to be incorrect for the reasons set out above and should be amended upwards to reflect the accurate assessment of completions in the period prior to the adoption of the plan.
- 1.47 There is insufficient robust evidence to suggest that site swill come forward as anticipated in the draft Local Plan.

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

- 1.48 As indicated at M9I1Q1, the are anomalies in the Trajectory (Table 3.2 of SADC-ED85A) that need to be reconciled before any confidence can be had in respect of the approach, rationale and justification for the trajectory, both for the first five years of delivery and, beyond.

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

- 1.49 The LIH/LAT Submissions¹ show that an inconsistent and poorly justified approach to site constraint assessment and delivery potential has been undertaken (as set out in the LIH/LAT submissions¹ and MIQ submissions for Matter 7).
- 1.50 As detailed above at M9I1Q1 and in the LIH/LAT Submissions¹ concerns have been set out in detail, but by means of example, we note again that the stepped trajectory for the first five years of the draft Local Plan, following adoption has been in a state of flux with proposals for:

- 710 dwellings per annum at Regulation 18 stage
- 485 dwellings per annum at Regulation 19 stage
- 630 dwellings per annum are now proposed in SADC-ED85A, SADC-ED85B and SADC-ED85C and yet no clear evidence for the changes in position being provided (at any juncture).
- 300 dwellings per annum for the pre-adoption period which is completely unjustified and less than the actual number of dwellings provided.
- There are inconsistencies between Part A and Part B of the Plan (SADC-ED85A, SADC-ED85B) leading to uncertainty as to what the land supply position is.
- Inadequate details on site delivery trajectories and associated details to demonstrate how decisions on dwelling completions have been reached.
- An impression of site delivery assumptions being used to achieve an overall objective to constraint housing delivery as far as possible and to delay and defer such delivery as far as is reasonably possible. This concern underpins both the site delivery assumptions but also the housing rationale for the plan itself.

- 1.51 The approach to date on land supply gives the impression of StADC 'painting by numbers' with no real basis in robust fact or a true appreciation of site deliverability considerations. If a stepped trajectory is required, then it should be substantially increased in the early part of the plan period. If the existing allocated sites cannot achieve such delivery rates, then more sites should be identified.
- 1.52 No, the approach is not robust, and it should be noted that seeking to prevent grey belt applications coming forward would further reduce the Council's ability to sustain their 5-year land supply (and windfall assumptions) if some large, allocated sites (like HGC) are delayed in providing completions. StADC's approach also seems contradictory, with its own evidence at Matter 6^{14, 15} as detailed above, where grey belt sites are identified as having the potential to substantiate the windfall position.
- 1.53 At no point has a clear explanation been provided to demonstrate how the housing land supply assumptions of the evolving draft Local Plan has been arrived at, what the basis for the assumptions are, and/or evidence offered to robustly demonstrate why the assumptions are correct and deliverable. The lack of evidence and justification goes to the heart of soundness and, as we have shown often have conflicting objectives.
- 1.54 Overall and in summary, the housing delivery assumptions in the Plan are not robust, evidence based or justified as demonstrated in LIH/LAT Submissions¹.

London

T: 0207 459 4549

E: info@urbanissta.co.uk

W: www.urbanissta.co.uk

Birmingham

T: 0121 517 1251

E: birmingham@urbanissta.co.uk

W: www.urbanissta.co.uk

URBANISSTA
Forward Thinking **Planning**