

ST ALBANS LOCAL PLAN EXAMINATION IN PUBLIC

STAGE 2 HEARINGS

Response to Matter 9: Housing Land Supply

Written Statement on behalf of Catesby Estates

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1.0 Issue 1 – Total Land Supply

Question 3 - 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?

Additional Evidence

The Council submitted documents SADC/ED85A, SADC/ED85B and SADC/ED85C to the examination in September 2025 in response to the Inspector's request for an updated local housing requirement and housing trajectory to account for an amended start date, with the the plan period to be brought forward to April 2024. Document SADC/ED85A provides a Main Modifications version of the Regulation 19 Local Plan Part A, and the main modifications are set out in SADC/ED85C.

It is set out in SADC/ED85C modification 7, that Table 3.2 Local Plan Housing Trajectory has been modified to 'reflect changes to capacity of proposed sites in other modifications'. The identified annual housing requirement, according to the standard method, has been updated to account for the modification to the plan period, and is now set at 15,045 new dwellings across the 2024/25 – 2040/41. The total Housing Land Supply for the plan period has also been amended and identifies a supply of homes totalling 15,489 new dwellings. The total new dwellings identified in the supply of new housing land equates to a circa 2.9% buffer.

The modified trajectory has included a new category of site and now includes 876 dwellings from 'Applications with Committee Resolutions to Grant Permission Subject to S106 Agreement Completion'. It would be helpful, to provide certainty and further justification for the allocations in the rest of the trajectory, if evidence was submitted by the Council to show which permissions have been counted in this category.

Similarly, the number of homes that can be delivered at the Broad Locations, namely North St Albans (B1) and East St Albans (B4), has been increased, however there is no evidence that has been presented to the examination to justify why additional units can be achieved. It is important to provide certainty that sites are going to deliver the number of homes anticipated to ensure security of supply. We would recommend that additional information is provided to ensure that the modified housing trajectory for the plan is robust.

Housing Trajectory

The Annual Housing Requirement (Stepped) for years 1-5 of the plan period has been determined to be 630 new dwellings. When including a 20% buffer, as required by paragraph 77 of the National Planning Policy Framework (NPPF) 2023, the requirement increases to 758 homes in the first 5 years of the Plan. The total Housing Land Supply in the first three years, which includes a 20% buffer in years 1-5 brought forward from years 6-15, is outlined as a supply of 420 (year 1), 581 (year 2) and 651 (year 3) new homes. The annual delivery of homes in the first three years of the plan period therefore does not achieve the 758 homes target. Instead, the 20% buffer for these years is pushed back into years 4 – 6 of the plan period.

Paragraph 77 and 79 of the NPPF 2023 requires the supply of specific deliverable sites to include a 20% buffer in addition to supply if there has been significant under delivery over the previous three years, which is characterised as delivery falling below 85% of the housing requirement. Notwithstanding that the Council has taken the stepped approach to delivering their identified annual housing requirement, providing a trajectory that underdelivers in years 1-5 of the plan period, the approach to delivery in the first three years of the plan period is not consistent with national policy. Sufficient land has not been identified to ensure that housing needs are met, nor has an appropriate buffer been applied in the first three years of the Plan.

If the Council is to continue with the stepped approach to housing delivery, then to be consistent with the requirements of national policy, the Council should seek to meet the local housing need plus a 20% buffer of 758 homes in the first three years of the plan period. We would suggest that the Council revisits the supply of homes in the first three years of the Plan and identifies additional land to meet the stepped housing requirement.

We would reiterate our recommendation set out in our Stage 2, Matter 2 Housing Growth and the Spatial Strategy Hearing Statement, to identify additional small to medium sites to deliver more homes earlier in the plan period. This could be achieved through investigating the recommendations set out in paragraph 97 of the NPPF 2023 to *“work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes”*. There is evidence that this approach may have already been investigated to some degree of success as the updated Housing Trajectory identified in SADC/ED85A has brought forward the delivery of homes on Broad Locations and Large Sites, originally set out in HOU 1.01 SADC Housing Land Supply Windfall and Capacity Evidence Paper – Housing Trajectory Addendum, from year 6-10 into years 1-5 of the plan period.

In addition to the suggestion to investigate the subdivision of sites, we would like to draw attention to the letter sent by the Minister for Housing, Matthew Pennycook MP, to Paul Morrison, Chief Executive of the Planning Inspectorate, on 9th October 2025. The letter outlines that the Minister is revoking the Ministerial Letter issued by Minister Nick Boles in March 2014 and providing Inspectors with the jurisdiction to request the Local Planning Authority to undertake a Green Belt review as part of an examination, where additional sites could be identified, to meet identified development needs.

While we understand that St Albans Council has already undertaken a Green Belt review, in light of the historic significant under delivery in housing and the challenging constraints within the district, and as an additional option, a review of the Stage 2 Green Belt Study could provide additional sites to meet housing needs earlier in the plan period.

2.0 Issue 2 – Five-Year Housing Land Supply

Question 6 - 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?

The updated housing trajectory set out in Table 3.2 of the Main Modifications draft Local Plan shows that there is a heavy reliance on Hemel Garden Communities (HGC) and the Broad Locations to deliver the housing requirement during year 6-15 of the plan period.

During year 6 of the plan period HGC and the Broad Locations deliver a combined total of 555 dwellings compared to an overall total housing land supply of 1,114 new homes, equating to 49.8% of the supply. By year 10 of the trajectory, HGC and the Broad Locations are projected to deliver circa 750 dwellings of the total housing land supply of 1,1015 new homes, equating to 71.9% of the overall supply. In contrast, during this period the remaining allocations deliver 21% (235 homes) of the overall supply in year 6, and 7.3% (74 homes) in year 10.

This pattern is continued in years 11-15, which HGC and the Broad Locations deliver 82.1% (825 homes) in year 11, and 76.3% (563 homes) in year 15. In contrast, other allocations in the Plan are anticipated to deliver just 3.4% (34 homes) of the annual housing requirement in year 11, and 3.9% (29 homes) in year 15.

This demonstrates that there is a heavy reliance on both HGC and the Broad Locations across the latter stages of the plan period to deliver the annual housing requirement. If these allocations fail to deliver as anticipated (due to issues relating to viability, infrastructure delivery, land ownership or S106 negotiations commonly seen on major development sites) then the Council risk falling short of the annual housing requirement and would be subject to the presumption in favour of sustainable development, as outlined in paragraph 77 of the NPPF 2024.

As recommended in our response to other questions during the examination, this soundness issue can be addressed through the identification and allocation of additional large, medium and small sites to diversify the housing land supply and ensure greater flexibility across the plan period. This could be achieved through the sub-division of strategic sites that have previously been considered as Broad Locations but could be delivered as a series of large sites.