

Examination of the St Albans City and District Local Plan - Stage 2 Hearing Sessions

Hearing Statement – Matter 9

Prepared on behalf of Redington Capital Ltd and CALA Homes



Revision Schedule

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
0	Final	JK	17/10/25	JK	17/10/25	DM	17/10/25

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Matter 9 – Housing Land Supply

Redington Capital Limited and CALA Homes (RCLCH) set out below their responses to the questions raised by the Inspectors. The responses are set out in the order they appear in the Inspectors' MIQs. The Inspectors should assume that no comment is made by RCLCH in respect of the questions that have are not included below.

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?

Response:

The previous standard methodology indicates that the minimum number of homes needed in the St Albans District is 885 dwellings per annum (dpa), resulting in a total need of 15,045 homes over the plan-period (17-yrs). The updated Table 3.2 contained within SACDC's Main Modifications to the Draft Local Plan (SADC/ED85A) explains that 15,489 dwellings (including 20% buffer in the first 5-years) are expected to be delivered over the plan-period.

On the basis that SACDC is only required to deliver a housing requirement set out in the previously standard methodology (plus 20% buffer), then the projected supply of housing would appear to be justified by this standard methodology figure¹.

Notwithstanding the above, Part 2 of the Local Plan is not allocating a sufficient amount of land to ensure it meets its housing need.

Consequently, SACDC is relying on a significant number of homes being delivered through windfall sites and large sites with extant planning permission(s) but SACDC has chosen not to allocate these large sites in the Draft Local Plan. One such site² that can come forward now is being promoted by RCLCH at land south of Chiswell Green Lane in Chiswell Green which now benefits from an extant planning permission³ and is included in the 2,290 dwellings figure for "Permissions (Estimated Future Completions)" of Table 3.2 on page 26 of the Draft Local Plan (*LPCD 02.01*) but is not allocated as a broad location site, nor is it listed in a table in the Draft Local Plan as evidence of their existence. SACDC is reliant on sites such as these to deliver its housing need. As such, large sites like this should benefit from a site allocation, and the green belt boundary changed accordingly, and / or should be included in a list of sites in a table in the Draft Local Plan.

¹ RCLCH remains disappointed that SADC have avoided using the latest standard methodology figure (1,659 dwelling p/a), which represents its present day housing need requirements, particularly when considering SADC's persistent under delivery of homes for a sustained and significant period of time

² Representation reference number 224 on pages 1174 to 1238 of the 'St Albans Draft Local Plan 2041 Regulation 19 Publication by Submission Report' (LPCD 20.03).

³ For 391 homes (including 40% affordable), open space provision and land for a 2FE school with planning permission (ref: APP/B1930/W/22/3313110)

Issue 2 – Five-Year Housing Land Supply

Question 1:

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

Response:

The previous standard methodology indicates that the minimum 5-year housing land requirement in the St Albans District to deliver is 885 dpa, resulting in a total land requirement to deliver the need for 4,425 dwellings over a 5-year period. However, Part 2 of the Local Plan is not allocating a sufficient amount of land to ensure it meets its five year housing land requirement, as explained below.

SACDC published its Main Modifications to the Draft Local Plan (ref: SADC/ED85/A, 85/B & 85/C) on 29th September 2025. These modifications include adjustments to Table 3.2 (Housing Trajectory) which now refers to a “Annual Housing Requirement (Stepped)”. Assuming the Draft Local Plan is adopted in mid-2026, the ‘rolling’ 5-YHLS and the estimated delivery expected by SACDC to start the year 2026/27 is set out in Table 1 below:

Table 1:			
Years:	Requirement:	Estimated Delivery:	Difference:
2026/27	630	758	+128
2027/28	630	758	+128
2028/29	630	758	+128
2029/30	630	758	+128
2030/31	630	758	+128
TOTAL	3,150	3,790	+640

SACDC’s chosen annual requirement (stepped) for the above 5-year period (630p/a) is well below:

- The estimated annual delivery rate expected by SACDC (758 dwellings p/a as set out in Table 3.2 of the Draft Local Plan);
- The previous standard methodology requirement (885 dwellings p/a); and
- The latest standard methodology requirement (1,659 dwellings p/a).

RCLCH consider that:

- SACDC should allocating more land for development to ensure it has a sufficient amount of land to meet its five year housing land requirement; and
- SACDC should:
 - Be using the annual housing requirement based on the 885 dwellings per annum; and
 - Accept that it will not achieve its 5-YHLS target and that it does not have a sufficient amount of land to deliver its housing requirement in the first five years.

However, if the Inspectors are minded to agree to a stepped trajectory, then the estimated annual delivery rate expected by SACDC (estimated to be 758 dwellings p/a in Table 3.2 of the Draft Local Plan) should be used. If SACDC is expecting to deliver this number of homes per annum, then why accept the lower requirement figure of 630 dwellings p/a figure?

Question 2:

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

Response:

As demonstrated in Table 1 above, in the first five-years following adoption of the Plan (2026/27 to 2030/31) SACDC is expecting to deliver approximately 3,790 dwellings (758 dwellings x 5-years). This is compared to the 4,425 dwellings that are expected by the previous Standard Methodology over that period (885 dwellings x 5-years).

RCLCH consider that SACDC should:

- Be using the annual housing requirement based on the 885 dwellings per annum; and
- Accept that it will not achieve its 5-YHLS target and that it does not have a sufficient amount dwellings to deliver its housing requirement in the first five years.

However, if the Inspectors are minded to agree to a stepped trajectory, then the estimated annual delivery rate expected by SACDC (estimated to be 758 dwellings p/a in Table 3.2 of the Draft Local Plan) should be used. If SACDC is expecting to deliver this number of homes per annum, then why accept the lower 'requirement' figure of 630 dwellings p/a figure?

Additional Comments – SACDC's Main Modifications

Context

SACDC published its Main Modifications to the Draft Local Plan (ref: SADC/ED85/A, 85/B & 85/C) on 29th September 2025. This includes:

- Adjusting the plan period to run from 1st April 2024 to 31st March 2041 (17-years); and

- Adjusting Table 3.2 (Housing Trajectory) which includes reference to a “Annual Housing Requirement (Stepped)” as follows:
 - 300 dwellings for 2024/25 (past completions);
 - 300 dwellings for 2025/26 (estimated completions); and
 - 630 dwellings per annum between 2026/27 to 2030/31.

As explained by SACDC at the Hearing Session on 14th October 2025, the purpose for including the 300 dwelling p/a figures is to help SACDC meet its Housing Delivery Test (HDT) requirements. This would be achieved by significantly reducing the HDT requirement for the St Albans District.

This would mean that upon adoption of the Local Plan, and assuming the Inspectors agree with the above figures and the “stepped” housing delivery trajectory, SACDC would potentially:

- Meet and exceed its 5-YHLS requirements when comparing the ‘required’ and ‘estimated delivery’ figures in the above Table 1 above; and
- Achieve 75% of its HDT requirement (as demonstrated in Table 2 below).

Table 2:									
	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test measurement
	2023-24	2024-25	2025-26		2023-24	2024-25	2025-26		
Current HDT target	885	885	885	2,655	365	381	339	1,085	40.8%
New HDT target – Scenario 1 ⁴	885	300	300	1,485	365	381	347	1,093	73.6%
New HDT target – Scenario 2 ⁵	885	300	300	1,485	365	432	365	1,162	78.2%

If the abovementioned two objectives are achieved by SACDC, this would result in:

- SACDC no longer suffering from a “demonstrable unmet need” for housing; thereby
- Frustrating any undetermined (or future) ‘grey belt’ or ‘VSC’ applications submitted under paragraphs 153 or 155 of the NPPF.

⁴ Scenario 1 - Estimated number of homes delivered are set out in the Main Modification to the Draft Local Plan Housing Trajectory, page 28

⁵ Scenario 2 - Estimated number of homes delivered are set out in the Regulation 19 Consultation Draft Local Plan Housing Trajectory, page 26 (if SADC reverts back to these original estimates)

Response:

It should not be for the Local Plan to set an artificially low annual housing requirement (i.e. 300 homes per annum) to enable a local planning authority to frustrate other objectives of the NPPF, such as the critical delivery of homes on sites that would normally be regarded as “appropriate” development (grey belt sites).

If the Inspectors are minded to agree to the above Main Modifications to the Draft Local Plan, the Annual Housing Requirement (stepped) figure of 300 dpa should be increased to:

- Reflect the standard methodology figure (e.g. 885); or
- At the very least, reflect the average figure generated from past completions (e.g. 381 dwellings in 2024/25 and 339 dwellings estimated to be completed in 2025/26) which are already included in Table 3.2 of the Draft Local Plan. This would equate to 360 dpa over these two years and would mean that upon adoption of the Local Plan, SACDC would still meet its 5-YHLS requirements, but would not achieve 75% of its HDT requirement (see Table 3 below), thereby still allowing appropriate grey belt sites to be determined on their own merits and helping SACDC meet its housing need through additional windfall sites.

Table 3:									
	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test measurement
	2023-24	2024-25	2025-26		2023-24	2024-25	2025-26		
Current HDT target	885	885	885	2,655	365	381	339	1,085	40.8%
New HDT target – Scenario 1 ⁶	885	360	360	1,575	365	381	347	1,093	69.4%
New HDT target – Scenario 2 ⁷	885	360	360	1,575	365	432	365	1,162	73.7%

End

⁶ Scenario 1 - Estimated number of homes delivered are set out in the Main Modification to the Draft Local Plan Housing Trajectory, page 28

⁷ Scenario 2 - Estimated number of homes delivered are set out in the Regulation 19 Consultation Draft Local Plan Housing Trajectory, page 26 (if SADC reverts back to these estimates)

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