

Redbourn Parish Council
Matter 9 – Housing Land Supply

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?

RPC Response:

RPC notes that the trajectory remains “stepped” and it increases as it gets closer to the end of the plan period (years 11-15), and the text explains that a buffer is included to provide headroom in case some sites do not success. However, the granular year-by-year outputs for early years and the site-specific phasing for the largest schemes (notably the Hemel Garden Communities and other Broad Locations, such as West Redbourn) remain the critical determinants of realistic supply.

While the stepped trajectory and headroom buffer are acknowledged, the Plan’s real deliverability hinges on publishing clear year-by-year outputs and firm, site-specific phasing, especially for HGC and other Broad Locations such as West Redbourn.

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

RPC Response:

This is a question for SACDC to answer to.

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?

RPC Response:

RPC’s Reg.19 analysis raised continuing concerns about deliverability in the early/middle years (years 1 to 10 post adoption), largely because the Plan relies heavily on Broad Locations, particularly the Hemel Garden Communities. Independent delivery research (Lichfields, Start to Finish 3rd ed., Sept 2024) indicates that a period of 6.6 years is taken, on average, from validation of the planning application to first housing completions on schemes of 2,000+ homes, with typical build-out rates of 100-188 homes per annum, which are both more cautious than the Council’s earlier trajectory assumptions for HGC. Those observations remain relevant given the updated trajectory still pushes significant output into years 5–10, even some in early year (years 2 to 5).

Risk has also increased at the margin: site allocation B3 West Redbourn has been reduced to 545 dwellings, and site UC33 in Redbourn is to be removed on flood grounds (as per the October 2025 Flood SoCG), curtailing a small, sustainable village-scale contribution that could otherwise have underpinned early completions. In this context, the Plan's flexibility would benefit from clearer contingencies in sustainable locations (higher tier settlements) and previously developed land, should large sites slip.

Issue 2 – Five-Year Housing Land Supply

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

RPC Response:

This is a question for SACDC to answer to.

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

RPC Response:

This is a question for SACDC to answer to.

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

RPC Response:

This is a question for SACDC to answer to.

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

RPC Response:

For smaller and medium sites, potentially yes, subject to routine conditions and utilities are approved and ready, albeit there is no evidence provided with regards to medium sites with development challenges, such as M6 (Land South of Harpenden Lane). For Broad Locations such as West Redbourn (B3) and HGC, clear evidence is not yet in the public domain: there is no published, site-specific phasing/milestone plan demonstrating consents, enabling works and delivery within five years. On the evidence before us, first completions from HGC within five years of adoption look challenging. RPC therefore requests submission of delivery statements for each site (promoter letters of intent and programs) to substantiate the five-year contribution.

Q5 What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by the Framework?

RPC Response:

The Plan acknowledges a buffer/headroom and defines windfall, but we have not seen a published, quantified windfall allowance with trend-based justification for the five-year period. We invite the Council to publish the trend table and calculation so the Inspector can test it. In the absence of any evidence to justify the scale of windfall proposed, reliance on this is not justified

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?

RPC Response:

The Main Modifications include a commitment to undertaking an early review of the Local Plan (to commence within a year of adoption). That is welcome, but insufficient alone to ensure the correct delivery of dwellings in the early/middle years if HGC slips. RPC therefore recommends the Plan also embeds a contingency: (i) a small pool of reserve sites capable of early delivery (particularly small/medium urban and village-edge sites, such as the proposed to be removed UC33 site), (ii) additional policy mechanisms in support of densification of the most sustainable settlements (e.g. St Albans) (as previously raised on Issue 1, Question 3) and/or (iii) a managed release mechanism tied to objective triggers (e.g., failure to reach defined annual completions or miss of pre-commencement infrastructure milestones at HGC). This would provide live flexibility and reduce the risk of immediate five-year shortfall and speculative pressure.