
**Examination of the Submitted St Albans
City & District Local Plan**

STATEMENT FOR STAGE 2 HEARINGS:

**MATTER 2 – HOUSING GROWTH AND
SPATIAL STRATEGY**

WRITTEN STATEMENT

Prepared by:

Woolf Bond Planning Ltd

On behalf of:

Linden Wates (Bricket Wood) Limited

September 2025

WBP Ref: 9030



Woolf Bond Planning
Chartered Town Planning Consultants

September 2025

CONTENTS

	Page
Executive Summary	2
Context and Background	3
Matter 2 Response	5

Executive Summary

Linden Wates (Bricket Wood) Limited have a controlling interest in a sustainably located and deliverable site at the former HSBC Training Centre, Smug Oak Lane, Brickett Wood (referred to as Hanstead Park) which is available to contribute to identified housing in the early years of the plan period.

The wider site has planning permission for residential development and is presently being delivered. In granting permission, it was established at appeal that the whole site has brownfield/ Previously Developed Land (PDL) status and that development would not cause encroachment into the countryside (due to the site's developed character as a former training campus in parkland setting). This PDL status, along with the limited contribution to Green Belt purposes and its sustainable location mean that this site is suitable for additional residential development.

However, the approach taken by the Council failed to fully consider the scope for development of such sites in the Green Belt – despite the NPPF (December 2023) identifying such as land being a primary focus for meeting housing need (paragraph 147).

Linden Wates (Bricket Wood) Limited, as detailed in the representations, have concerns with the failure to ensure sufficient housing growth (in terms of the overall housing target in Policy SP1) and the failure to identify and allocate sufficient land to meet housing needs. Accordingly, additional site allocations should be identified. The objections may be summarised as follows:

- The Plan is **not positively prepared** in so far as the proposed strategy for growth will fail to deliver the identified housing need. It should plan for the at least 885 dwellings annually over a minimum 18 year plan period from April 2024 until March 2042; &*
- The Plan is **not consistent with national policy** having regard to the obligation to provide a strategy for at least 15 years post adoption.*

The failure to provide sufficient deliverable site allocations will serve to frustrate attempts to address key factors affecting worsening affordability and denying people the opportunity to own their own home, contrary to Government policy under paragraph 60 of the NPPF which is seeking to significantly boost the supply of housing to address the current housing crisis.

The land at the former HSBC Training Centre should be included as an allocation in policies LG4 & LG8 for around 60 dwellings.

The above changes are necessary to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF (December 2023)¹.

¹ Paragraphs 234 and 235 of the 'current' NPPF (Dec 2024) states that Local Plans submitted for examination before 12th March 2025 will be examined under the relevant previous version of the NPPF.

CONTEXT AND BACKGROUND

- 1.1. This Statement has been prepared by Woolf Bond Planning Ltd on behalf of Linden Wates (Bricket Wood) Limited and addresses several questions posed for Matter 2 of the Stage 2 Hearing Sessions as set out in the Inspector's Schedule of Matters, Issues and Questions for Stage 2 ("MIQs") (SADC/ED84).
- 1.2. In setting out our response, we continue to rely upon the content of our detailed Regulation 19 representations ("our Representations") submitted on behalf of Linden Wates (Bricket Wood) Limited in response to the Regulation 19 consultation on the Draft Local Plan on 7th November 2024 and our submissions made to the stage 1 part of the examination.
- 1.3 As set out at footnote 1 on page 2 above, the Local Plan is being examined for consistency against the December 2023 version of the NPPF. Accordingly, all references to the NPPF in this Statement relate to that version (unless otherwise stated).
- 1.4. Our answers to the questions should be read in the context of our position that insufficient deliverable and developable land has been identified in the submitted Local Plan in order to contribute towards addressing unmet needs of neighbouring authorities (NPPF paragraph 61) together with ensuring the strategy extends for at least 15 years after its adoption (NPPF paragraph 22).
- 1.5. The Plan would not be sound without modifications to include:
 - Amending the Plan period so that it covers full monitoring years and extends until March 2042. Since full information on sources of supply relate to the position at 1st April 2024 is now available (SADCED71A and

Paragraph 230 of the preceding NPPF (December 2023) indicates where a plan was submitted after 19th March 2024, they will be examined under that version of the NPPF. Where the Plan was submitted on or before 19th March 2024, they would be examined under the NPPF (September 2023).

September 2025

HOU01.01), the logical plan period would be April 2024 to March 2042;

- Additional site allocations are made to ensure that the minimum housing requirement (885dpa) is achieved over the extended plan period; &
- Small and medium sites are allocated in particular to avoid the need for a stepped housing trajectory.

- 1.6. This Statement amplifies our Representations and references are made to that document where relevant.

MATTER 2: HOUSING GROWTH AND SPATIAL STRATEGY

Issue 1: Housing Requirement

5. Following discussions at the Stage 1 hearing sessions, the Council accepted that the annual housing requirement should be applied across the full plan period from April 2024 to March 2041. It was also accepted that a recalibration of the stepped housing requirement was needed to reflect the most up-to-date position on predicted housing delivery and the forward trajectory.

Question 1: How should the minimum housing requirement be reflected in the Plan to address these soundness matters? Is there a need for the housing requirement to feature in Policies SP1 and SP3?

To assist with the examination hearing sessions, it would be useful for the Council to produce a new housing requirement figure and trajectory to replace Table 3.2.

- 2.1. This response has been prepared in advance of the Council's preparation of a new housing requirement and trajectory to replace Table 3.2, as indicated above in the Inspector's MIQs. Nonetheless, we have prepared analysis of the projected delivery in the Local Plan compared to the stepped requirement as indicated in Table 3.2 (and repeated in the Council's response to Question 2 of the Stage 1, Matter 2, Issue 2 Statement (paragraph 2.1)). The Table below also provides a comparison with the minimum requirements of the applicable Standard Method guidance relevant for the examination of this Local Plan.
- 2.2. As indicated in the Council's Stage 1, Matter 1, Issue 1 Statement (paragraph 2.1), the Standard Method derivation of the District's Local Housing Need figure results in an annual need for at least 885 dwellings. The Inspector's identification of April 2024 as the starting point for the Local Plan is consistent with our representation, as this aligns with the availability of robust data in relation to supply sources.

Comparison of Housing Requirements and expected delivery

Year	Requirement					Delivery		Difference (H) (G-D)
	Standard Method		Submitted LP (Table 3.2)		Difference in cumulative (E) (D-B)	Forecasted (Table 3.2)		
	Annual (A)	Cumulative (B)	Annual (C)	Cumulative (D)		Annual (F)	Cumulative (G)	
2024/25	885	885	389	389	-496	432	432	43
2025/26	885	1,770	389	778	-992	365	797	19
2026/27	885	2,655	485	1,263	-1,392	320	1,117	-146
2027/28	885	3,540	485	1,748	-1,792	430	1,547	-201
2028/29	885	4,425	485	2,233	-2,192	316	1,863	-370
2029/30	885	5,310	485	2,718	-2,592	822	2,685	-33
2030/31	885	6,195	485	3,203	-2,992	1,053	3,738	535
2031/32	885	7,080	1,255	4,458	-2,622	1,178	4,916	458
2032/33	885	7,965	1,255	5,713	-2,252	1,482	6,398	685
2033/34	885	8,850	1,255	6,968	-1,882	1,350	7,748	780
2034/35	885	9,735	1,255	8,223	-1,512	1,194	8,942	719
2035/36	885	10,620	1,255	9,478	-1,142	1,094	10,036	558
2036/37	885	11,505	1,025	10,503	-1,002	1,085	11,121	618
2037/38	885	12,390	1,025	11,528	-862	1,102	12,223	695
2038/39	885	13,275	1,025	12,553	-722	1,003	13,226	673
2039/40	885	14,160	1,025	13,578	-582	920	14,146	568
2040/41	885	15,045	1,025	14,603	-442	842	14,988	385

2.3. The above table indicates that the stepped requirement detailed in the Plan (with the 2024/25 requirement applying to the whole year rather than just the last six months) is such that its approach does not achieve the minimum requirements as obligated by the NPPF (paragraph 61). This is illustrated by the cumulative shortfalls shown in column E which confirm that the proposed target maintains a shortfall of at least 442 dwellings compared to that associated with the application of the Standard Method figure (885dpa).

2.4. The implications of the proposed Local Plan target's consistent failure to achieve the minimum standard method requirement for 885 dwellings is emblematic of the approach in failing to seek to boost the supply of housing as expected by the Government consistent with NPPF paragraph 60.

2.5. Column F in the Table shows the Council's expected housing delivery as

indicated in Table 3.2 of the Submitted Plan. Column H then compares this with the stepped housing requirement as also shown in Table 3.2 and repeated in paragraph 2.1 of the Council's Stage 1 Statement for Matter 2, Issue 2.

- 2.6. Notwithstanding the detailed objections in the representation regarding the robustness of the Council's evidence on the realism of expected sources of supply, the above table indicates that consistently the approach also fails to deliver the minimum requirements of the standard method given even where surpluses are shown in column H, they are insufficient to address the shortfall as shown in column E. The objection concerning the realism of the expected delivery, especially its failure to fully consider sustainably located sites in the Green Belt means that the overall approach of the Plan and the plan period is not sufficiently clear, nor is it appropriate.
- 2.7. As indicated in the representation (and detailed in our written response to Stage 1, Matter 2, Issue 2), our view is that the Policies of the Local Plan must seek to achieve the standard method requirement of 885dpa at the earliest opportunity and consequently any stepping of targets should be for the shortest period possible (if at all) such that the Plan achieves the Government's objectives of boosting the supply of housing. The Plan should not retain the current approach of delaying delivery of the Standard Method requirement until the end of the Plan period (albeit as indicated above it does not meet this currently).
- 2.8. The housing requirement, including annual figures must be specified in a policy of the Local Plan. As indicated in the representation, our suggestion is for the Local Plan to state that the annual requirement is for at least 885 dwellings, consistent with the Standard Method.
- 2.9. The conclusions from our analysis are that the Council's proposed stepped approach results in the unnecessary delay of the need for prompt delivery of housing at a time of established national housing crisis and in an authority that has consistently under delivered for a very long period of time. Further, the proposed approach fails to even meet the full needs of the standard method.

September 2025

Finally, the plan fails to introduce any flexibility into the identified supply to meet its housing targets. The result is that if one element or component of the proposed housing supply fails, then the plan will fail to meet its housing targets.

- 2.10. Ultimately, for the reasons detailed in our matter 2 and 9 statements, there would be a shortfall in dwellings over the plan period as a whole and this shortfall is further exacerbated through the suggested stepped housing trajectory approach. There is a need for an alternative approach to meeting the housing needs of the District over the plan period through the addition of some extra housing allocations.
- 2.11. **Consistent with our written response to Stage 1, Matter 2, Issue 2, the resulting outcome from this exercise is such that there is a need for additional allocations of a small or medium size so to fill the identified housing delivery gap (or shortfall).**

TRGR/WBP/9030
