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

STATEMENT FOR STAGE 2 HEARINGS:

MATTER 9 – HOUSING LAND SUPPLY

WRITTEN STATEMENT

Prepared by:

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On behalf of:

Linden Wates (Bricket Wood) Limited

September 2025

WBP Ref: 9030



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September 2025

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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 9 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).

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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 9: HOUSING LAND SUPPLY

Issue 1: Total Housing Land Supply

- 2.1. The responses on this issue are based upon the housing trajectory detailed in Table 3.2 of the Submitted Local Plan.

Question 1: What is the most up-to-date position regarding the projected total supply of housing over the plan period?

- 2.2. This is a matter for the Council.

Question 2: What is the windfall allowance based on and is it justified?

- 2.3. The representation (paragraph 2.29) referred to an objection to the use of unjustified assumptions concerning sources of supply relied upon by the Council. This includes the Council's windfall allowance of 145dpa, which the Housing Supply Topic Paper (SADC 01.02) (2024) indicates (table after paragraph 5.3) is derived from all sizes of site taking account of historic delivery 2013-23).
- 2.4. Whilst the use of past delivery trends is a factor referenced in NPPF paragraph 72; no consideration has been given to the impact of the Council's dated policy framework has had on these rates. Furthermore, whilst sites of less than 0.25ha (5 dwellings) were excluded from the Housing and Economic Land Availability Assessment, bigger ones were considered. The Council has not demonstrated that the historic rates on sites above the 5 dwelling threshold can be maintained throughout the plan period to achieve the historic rates achieved (70dpa)². This is nearly half the 145dpa windfall allowance. **In summary, windfall delivery historically will inevitably be far higher in a situation where a Council does not have a Local Plan than one where sites have been proactively identified through the adoption of a new Local Plan. For this reason, the**

² 22 dpa from medium and 48 dpa from large sites

suggested windfall allowance is overly optimistic. A real and credible alternative exists. Namely, the identification of more specific supply in the form of small or medium site allocations now.

- 2.5. With respect to sites larger than 5 dwellings, Table 3.2 indicates that of the sites listed within the HELAA and the Urban Capacity Study, their total is 903 dwellings.³ This is equivalent to nearly 13 years delivery at 70dpa.
- 2.6. As Table 3.2 of the Submitted Plan includes a windfall allowance for 14½ years, there is limited if any justification for this from sites of 5 or more dwellings given it duplicates the HELAA sources of supply.
- 2.7. Without clear evidence (as required by NPPF paragraph 72), the windfall allowance should be no greater than 75dpa⁴ (indeed it is noted that the Elmbridge Local Plan Inspector considered that a windfall allowance should not be included at all within the first 5 years of the plan period). Across the plan period, this results in a need to identify a further 1,015 dwellings (given that the Council currently expects 2,103 dwellings from windfall sites through to 2041)⁵.

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?

- 2.8. No. As indicated in the representations and the statements submitted to the examination; the proposed land for housing allocations is insufficient to ensure housing needs are met. This is evidenced in the Table included in our Stage 2, Matter 2 statement. The appendix shows that compared to the 885dpa Standard Method minimum housing requirement from April 2024 to March 2041 (15,045 dwellings), from the identified sources in Table 3.2, the total supply is only 14,603 dwellings. This is a shortfall of 442 dwellings.

³ 43 in HELAA and 860 in the Urban Capacity Study

⁴ 1,088 dwellings during the current Plan period extending to 2041 (75dpa for 14.5years)

⁵ Table 3.2 of the Submitted Plan or Appendix A in HOU 01.02

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- 2.9. However, the extent of the shortfall is yet greater than this due to the unjustified delivery expectations (such as the windfall allowance) from the various sources relied upon by the Council.
- 2.10. In order to ensure sufficient land is allocated to address the shortfall of 442 dwellings indicated above, further sites must be included through modifications. Given the extent of the shortfall is actually greater (due to an overly optimistic windfall allowance) than 442 dwellings and the need for flexibility within the housing supply, a significant number of additional sites must be allocated.

Issue 2: Five year Housing Land Supply

Question 1: What will be the five-year housing land requirement upon adoption of the Plan?

- 2.11. The Local Development Scheme (September 2024) indicates that adoption of the Plan is expected in March 2026. Whilst our representations disputed the realism of that occurring, for the purposes of answering this question, the 5year land supply period is therefore assumed to run from April 2026 to March 2031.
- 2.12. The table below therefore details the calculation of a 5 year housing target based upon the phased targets set out in Table 3.2. The table below retains a 20% buffer pursuant to the latest Housing Delivery Test results, whilst recognising that this would apply irrespective from 1st July 2026 due to the significantly higher housing target arising from the 2024 NPPF (consistent with the requirements of paragraph 78(c) of the 2024 NPPF). The requirement includes addressing any shortfall through the Sedgefield approach (albeit as at April 2026 applying the (in our view flawed) Council's stepped target there is no shortfall⁶).
- 2.13. The table below indicates that the 5 year target from April 2026 to March 2031 is therefore 2,910 dwellings (or 582dpa).

⁶ Requirement Apr 24-Mar 26 of 778 dwellings (389 x 2) compared to delivery of 797 dwellings (432 in 2024/25 and 365 dwellings in 2025/26). This is therefore a potential surplus of 19 dwellings.

Step	Dwellings
Requirement from April 2026- March 2031 (485dpa (Apr 26-Mar 31))	2,425
Plus 20% buffer	485
Requirement for 5 years	2,910

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?

2.14. The trajectory in Table 3.2 of the Submitted Plan (and repeated in the appendix to this statement) indicates that from April 2026 to March 2031, 2,941 dwellings are expected for delivery⁷.

Question 3: What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?

2.15. The statements to the examination and the representation indicated the concerns that the assumptions were not robust.

Question 4: 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?

2.16. This is a matter for the Council.

Question 5: 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?

2.17. Table 3.2 of the Submitted Local Plan provides expected delivery of dwellings by various sources. During the 5 year period April 2026 to March 2031, this

⁷ 320 + 430 + 316 + 822 +1,053

table indicates that 653⁸ dwellings out of the 2,941 envisaged would arise from windfalls.

- 2.18. As indicated in the response to Matter 1, Question 2 of this Issue, it is not considered that there is compelling evidence that windfall sites will come forward at the rate envisaged. The response detailed earlier in this statement indicates that the annual rate should not exceed 75dpa.
- 2.19. Applying this lower rate for the 5 year period (Apr 2026-Mar 2031) reduces the expected windfall allowance from the current 653 dwellings to 338 dwellings⁹. This is therefore a reduction of 315 dwellings.
- 2.20. As the expected surplus for the five year period April 2026-March 2031 is only 31 dwellings¹⁰, removal of 315 dwellings as a result of the correction to the windfall allowance would mean that the Council is unable to demonstrate a 5 year 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?

- 2.21. If the larger sites or other sources of supply do not deliver as expected, (given the identified potential surplus from the period April 2026 to March 2031 is only 31 dwellings), only a very modest change in build rates will result in a deficit.
- 2.22. The Council's Housing Land Supply Evidence Paper (HOU01.02) references research on the timelines of for determination and implementation of a planning application and subsequent build rates (paragraph 6.1). This is in the research by Lichfields "Start to Finish" (3rd edition). Whilst this is referenced in the Topic Paper, the research itself is not included. Extracts from the Lichfield's research relating to the timeline for the determination and implementation of a planning application and its subsequent build out is shown below (figures 3.1 and 4.1

⁸ 73 dwellings in 2026/27 and 145dpa for the other four years

⁹ 75dpa for 4½ years

¹⁰ Supply of 2,941 dwellings less five year requirement of 2,910 dwellings

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respectively).

Figure 3.1 Median average timeframes from validation of the first application to completion of the first dwelling

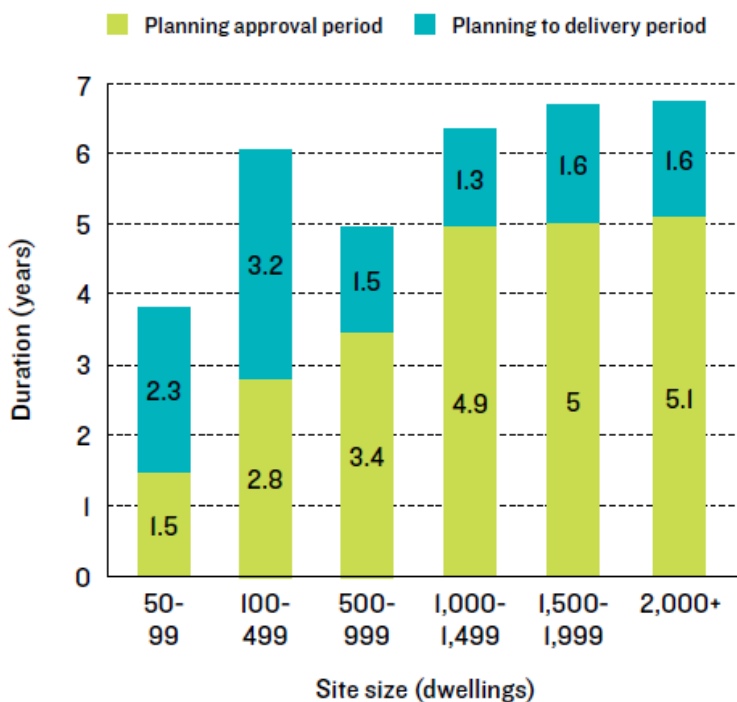
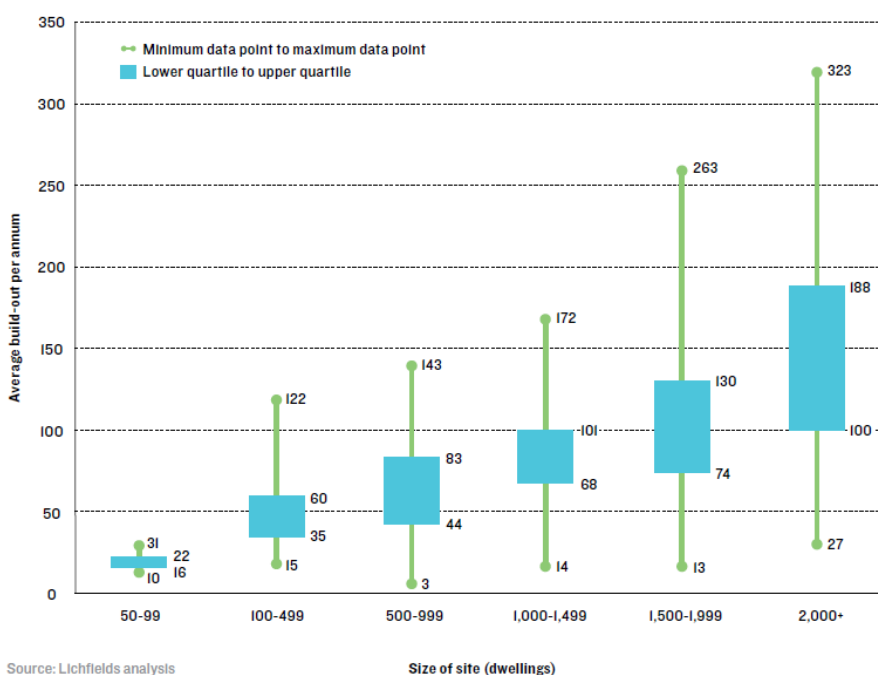


Figure 4.1: Average build-out rate by size of site (dwellings)



Source: Lichfields analysis

2.23. Figure 3.1 indicates that typically for sites (especially those of 100 or more

dwelling), there are typically 5-6 years from submission of a planning application until the first dwelling is completed.

- 2.24. The updated Housing Land Supply Evidence Paper Trajectory (HOU 01.01) provides the data on site specific delivery for the sources listed in Table 3.23 of the Submitted Plan. For larger sites allocated in the Plan, the Trajectory envisages delivery during the 2029/30 monitoring period. Given the evidence in Figure 3.1 of the Lichfield's research is that typically, there is a five year period from validation of an application to the first dwelling completion, for those sites from which delivery is expected in 2029/30, the application should already be with the Council to allow the typical 5 years since they should have been received before 31st March 2025.
- 2.25. Whilst evidence on the planning status of the various sites in the supply is a matter for the Council, as applications on the majority of them have yet to be submitted, this raises doubts over the realism of the expectations of delivery. This is further compounded by the build rates expected on the specified sites exceeding those typically achieved on similar sized sites as shown in figure 4.1 of Lichfields.
- 2.26. Although we have not undertaken a specific assessment of the sites and sources relied upon, it is expected that the rates delivered will be less than that that implied by the Council's trajectory. This is therefore likely to result in a yet greater deficit in land supply.
- 2.27. The likely deficit will be compounded by reductions in supply from windfall sites as indicated in the representations and this statement.
- 2.28. Consequently, there is insufficient flexibility in the supply such that the Plan does not immediately become out of date. This lack of flexibility is also indicated by the inability to maintain a 5 year housing supply based upon the phased requirement in the existing plan and the expected delivery.
- 2.29. This is shown in the Table below which indicates that other than the very

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modest surplus in 5 year supply for 2026-31 (if all the Council's assumptions are accepted, a point that we dispute), no other assessment 5 year period enables the Council to be able to demonstrate a 5 year supply. This is given the requirement (as per the 2024 NPPF) that from 1st July 2026, a 20% buffer will apply irrespective of Housing Delivery Test results.

Analysis of five year housing targets and supply based upon phased targets and delivery in Table 3.2 of Submitted Plan.

5 yr period	A - Forecast supply 5 year supply ¹¹	B - 5 yr target (base) ¹²	C - Surplus or shortfall at base date ¹³	D - 5 yr target inc shortfall (Sedgefield) (B + C)	E - 5 year target (inc 20% buffer) (D + 20%)	F Surplus/ shortfall (A - F)	G - Years (A / (E/5))
2024-29	1,863	2,233	0	2,233	2,680	-817	3.48
2025-30	2,253	2,329	43	2,329	2,795	-542	4.03
2026-31	2,941	2,425	19	2,425	2,910	31	5.05
2027-32	3,799	3,195	-146	3,341	4,009	-210	4.74
2028-33	4,851	3,965	-201	4,166	4,999	-148	4.85
2029-34	5,885	4,735	-370	5,105	6,126	-241	4.80
2030-35	6,257	5,505	-33	5,538	6,646	-389	4.71
2031-36	6,298	6,275	535	6,275	7,530	-1,232	4.18
2032-37	6,205	6,045	458	6,045	7,254	-1,049	4.28
2033-38	5,825	5,815	685	5,815	6,978	-1,153	4.17
2034-39	5,478	5,585	780	5,585	6,702	-1,224	4.09
2035-40	5,204	5,355	719	5,355	6,426	-1,222	4.05
2036-41	4,952	5,125	558	5,125	6,150	-1,198	4.03

2.30. The first key point here is that the Council's approach towards a stepped requirement and their assessment of deliverable supply are disputed. **Irrespective, even if the Council's approach is accepted it is evident from the above table that even when applying the Council's stepped housing targets and supply, the plan in every 5 year housing land supply assessment (with the exception of 2026 to 2031¹⁴) will fail to demonstrate**

¹¹ See column F in Table of Appendix

¹² See column C in Table of Appendix

¹³ See column H in Table of Appendix

¹⁴ Albeit only a 5.05 years supply can be shown which equates to be minimum surplus of 31 dwellings

the minimum 5 year supply. This position would become one of even greater shortfall if our points relating to the deliverability of the supply and the phased housing targets are also acknowledged.

- 2.31. The effect of this situation is unsound. It would encourage speculative applications, that would inevitably come forward contrary to the plan led system. In summary, there is not sufficient flexibility to ensure that the plan will not become out of date very soon after or immediately upon adoption. Such an approach fails to the positive planning, justified and effective tests of soundness. There is a reasonable alternative; allocate some additional, deliverable small or medium sized site allocations now so to mitigate this issue. Doing so would increase the likelihood of the plan led system not being overtaken by speculative applications almost immediately upon the plan's adoption.

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Appendix - 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
