

St Albans Local Plan EIP

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?

This is for the Council to answer. However, it is noted that an updated trajectory was published in the Council's matter 2 statements and HBF's statements are based on this latest position.

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

The Council have included a windfall allowance of 145 dwellings per annum from 2028/29 with a lower rate of 73 dwellings in 2027/28 in order to avoid double counting existing permission. The justification for this rate set out in HOU01.01 with paragraph 5.3 stating "*The Council then undertook further work on windfall to establish an updated annual windfall allowance figure for the Regulation 19 Publication Local Plan housing trajectory, published in September 2024. This research examined residential completions during a 10 year period from 2013/14 to 2022/23, using the most recently available data. It concluded that the annual windfall allowance for the Regulation 19 Publication Local Plan housing trajectory should be 145 net dwellings per annum*". HBF could not find the evidence as to past supply in HOU01.01 with only the averages provided in the table in paragraph 5.3. It is not clear from this what was considered to be windfall given that St Albans last adopted a local plan in 1994. More detail would be helpful in considering whether this rate is justified. Without more detail it is not possible to state whether the rate is one that is declining nor whether the future rate takes into account of the fact that many sites that may have been windfall previously have already been included in the trajectory as sites within the urban settlements (either within the HELAA or UCS) and as the medium to small sites allocations.

Therefore, at present HBF do not consider the windfall allowance to be justified.

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?

Based on the updated trajectory in the Council's matter 2 statement there is a surplus of 444 homes – just under 3% of the requirement for the plan period. This provides very little buffer and offer no surety that housing need will be met across the plan period. HBF does not have any particular concerns with regard to the deliverability of the sites to be allocated in the local plan however the supply of homes is heavily on large strategic sites with four of those allocations (H1, H2, H3 and B1) delivering over 1,000 homes each. Should any of these be delayed or delivery more

slowly than anticipated then there is a significant risk that housing needs will not be met in full over the plan period.

Clearly one solution to this issue would be to require the allocation of additional sites to ensure that there is at least 10% buffer between overall enable the Council to have a five year land supply post 2026/27. On the basis the trajectory provided by their Council in Matter 2 statement the Council will only be able to show a five year land supply in just one year post adoption of the local plan. This will mean that on the basis of paragraph 11 that the policies relating to housing needs within this plan will be considered out of date.

If additional allocations are not considered to be an appropriate way forward in this case, then the very least that is required is an immediate review with a clear deadline as to when the plan should be submitted with consequences as to what will happen should this deadline not be met. As set out in our representations HBF would suggest a policy similar to one found sound in the Bedford Local Plan 2030.

Issue 2 – Five-Year Housing Land Supply

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

On the basis of the proposed stepped trajectory and amended expectations of supply in the matter 2 statement the Council's housing requirement in the year it is adopted will be 3,780 homes. This is based on the Sedgefield approach required by national policy and the assumption that the plan will be adopted in 2026 and as such be required from July of that year to include a 20% buffer in its five year housing land supply. This would result in a housing land supply of 5.01 years

Five year land supply assessment 2026

5 year requirement	3,150
Five year supply	3,789
Shortfall brought forward	0
Buffer – 20%	630
Total five year requirement	3,780
Years supply	5.01

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

See table above.

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

Evidence will, need to be provided as to whether all the sites expected to come forward in the first five years are deliverable. As outlined in the glossary of the NPPF to be considered deliverable, sites for housing should be available, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular the NPPF requires that where a site has outline planning permission for major development or has been allocated in a development plan, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. With regard to the strategic sites that are expected to come forward within the first five years it is this evidence that is required. The presumption on the basis of research such as that carried out by Lichfield in its Start to Finish report would indicate that the largest sites allocated in this plan will take on average 6 years to start delivering new homes from the validation of the planning permission. HBF recognises that where there are development partners already on board that both have the commitment and capacity to bring these sites forward in the first five years then the inclusion in the first five years would be justified. The Council needs to provide this site specific justification but without it the more general evidence from across the country is that it is unlikely that the strategic sites allocated in this plan will forward within 5 years of adoption.

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?

For council.

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?

In the updated trajectory a windfall allowance is included in the second year at a reduced rate of 73 dwellings and then for the following three years at the full rate of 145 homes. HBF do not consider it to be sound to include any windfall allowance in the first three years of a five year land supply to ensure that there is no double counting between windfall assumptions and current permissions.

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?

There is insufficient flexibility in the five year land supply at present should the broad locations not deliver as expected.

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