## Matter 2 – Housing Growth and the Spatial Strategy

## Issue 2 - Site Selection Methodology

6. Natural England has confirmed that it is no longer pursuing an extension to the Chilterns National Landscape (formerly referred to as the AONB). The potential extension of the AONB had previously informed the Council's decision not to allocate certain sites for development. Through Examination Document SADC/ED80B it is now suggested that the sites should form part of the Local Plan to ensure that it is justified and sound.

## Q1 Why is it necessary for soundness to include allocations M14, M24 and M26 in the Plan? How would their allocation address specific soundness matters?

- 1.1 The Council considers that it is necessary for soundness to include allocations M14, M24 and M26 in the Plan in order to help demonstrate compliance with all four aspects of soundness set out in the NPPF, namely:
  - a) **Positively prepared** providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs
- 1.2 The three sites assist in ensuring that the Plan will, as a minimum, seek to meet the area's objectively assessed housing needs.
  - b) **Justified** an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 1.3 Given that they were included at Regulation 18 stage, based on comprehensive evidence including the Green Belt Review and Site Selection processes, and the only reason for their exclusion at Regulation 19 stage was because of Natural England's proposed extension to the Chilterns National Landscape, the three sites assist in ensuring that the Plan is consistent in its approach to the proportionate evidence base and is an appropriate strategy.
- 1.4 The conclusions from GB 02.03 Green Belt Review Annex Proforma Report (2023) respectively are:
  - M14 Beesonend Lane, Harpenden, AL5 2AB

SA-11

. . .

The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-7.

M24 - South of Codicote Road, Wheathampstead, AL4 8GD

SA-44

...

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration as RA-26 (including the section of Green Belt land comprised of urban development to the west of the sub-area).

M26 - Highway Chipping Depot, Lower Luton Road, AL4 8JJ

SA-41

. . .

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-25.

Further justification is set out in SADC/ED80B, which includes:

Implications for Sites M14, M24 and M26

- 8. Three of the sites (M14, M24 and M26) removed from the emerging Local Plan prior to its publication under Regulation 19, were only removed on the grounds that they were in an area likely at the time to become part of the Chilterns National Landscape. In all other regards they were considered suitable sites for allocation having been recommended for further consideration as to whether they should be removed from Green Belt by the Stage 2 Green Belt Review 2023 (GB 02.02), and there being no other reason why they should not be considered developable.
- 9. As the extension of the Chilterns National Landscape is now, subsequent to the submission of the Plan, not progressing as a project, there is now no longer any reason for the three sites (M14, M24 and M26) to be excluded from the draft St Albans Local Plan. On the basis of a consistent and justified approach to the allocation of sites for development in the district, the Council would wish to indicate as a Direction of Travel, without prejudice to any future consideration of sites in the Plan, and subject to a Sustainability Appraisal, main modifications to the Plan to include Sites M14, M24 and M26 as allocations within the St Albans Local Plan, and to remove the sites from the Green Belt. Appendix 1 of this note sets out how they would appear in Part B of the Local Plan.
- 10. All proposed allocations in the draft St Albans Local Plan are supported by Transport Impact Assessments, undertaken following the Regulation 18 consultation as part of the preparation of the Regulation 19 draft Local Plan. Transport Impact

Assessments were not completed for the four sites removed from the emerging Local Plan on the grounds that Natural England were planning to recommend that they be included within a potential extension to the Chilterns National Landscape. These have been completed to support this note. The Transport Impact Assessments for sites M14, M24 and M26 can be found in Appendix 2.

- 11. Site M14 is adjacent to Childwickbury Conservation Area and two Grade II listed buildings lie to the south of the site. The capacity of the site has been adjusted to ensure that development harm to the setting and significance of these heritage assets is minimised. In line with the approach taken for other sites with the potential to impact on built heritage, a Heritage Impact Assessment has been undertaken for site M14. This can be found in Appendix 3.
- 12. Part of site M26 is at high risk of flooding. 32% of the site lies in Flood Zone 2, 1% of the site is at high risk of surface water flooding and 17% of the site is at high risk of groundwater flooding with groundwater less than 0.025m below ground level. Both the areas at high risk of surface water flooding, and at high risk of groundwater flooding are wholly within the part of the site that lies within Flood Zone 2, meaning that 68% of the site is at low risk of flooding. The capacity of the site has been adjusted to ensure that no development takes place in areas at high risk of flooding. The site was assessed as part of the Level 2 Strategic Flood Risk Assessment2 (EDH 03.23) and was included in the Council's Flood Risk Sequential Test and Exception Test (SADC/ED64)3. This is consistent with the NPPF, NPPG and the approach taken for all other sites.
- c) **Effective** deliverable over the plan period
- 1.5 The three sites assist in ensuring that the Plan (and in particular meeting the 'Standard Method' figure for Local Housing Need) is deliverable over the Plan period.
  - d) **Consistent with national policy** enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy
- 1.6 The three sites assist in ensuring that the Plan is consistent with national policy including in particular meeting the 'Standard Method' figure for Local Housing Need over the Plan period.

Q2 How have the site boundaries been established and are they justified and effective? Do any require alterations to the Green Belt boundary, and if so, what are the exceptional circumstances for doing so?

2.1 Yes, the site boundaries for M14, M24 and M26 are considered to be justified and effective. The three sites (M14, M24 and M26) will require alterations to the Green Belt boundary and there are considered to be exceptional circumstances to justify doing so.

2.2 Sites M14, M24 and M26 are justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024). Paragraph 7.2 states:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- The acuteness/intensity of the housing need.
- The inherent constraints on supply/availability of non-Green Belt land.
- The difficulties of delivering sustainable development without impinging on the Green Belt.
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.
- The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.
- 2.3 The evidence paper goes on to say in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land. Further there are existing areas of significant built development created since the last Local Plan was adopted in 1994, identified in the Green Belt Review stage 2, where the Council has concluded that the necessary 'Exceptional Circumstances' exist to amend the green belt boundaries

2.4 In relation to sites M14, M24 and M26, the specific localised Green Belt impacts are well understood because of the findings of GB 02.01 Green Belt Review (2024) and GB 02.03 Green Belt Review Annex Proforma Report (2023). For site M14, GB 02.03 on pages 64 to 66, relating to sub-area 11, states:

#### Purpose Assessment

#### Summary

The sub-area performs weakly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs weakly against purpose 1 criteria (b). The sub-area does not meet purposes 2 and 4 and performs weakly against purpose 3.

#### Wider Green Belt Impacts

#### <u>Summary</u>

Overall, the sub-area does not play an important role with respect to the strategic parcel and if released in isolation, is unlikely to significantly harm the performance of the wider Green Belt.

## Sub-area category & recommendation

The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-7.

2.5 For site M24, the Green Belt Review assessment found in GB 02.03 - Green Belt Review Annex Proforma Report (2023) on pages 208 to 210, relating to sub-area 44, states:

## Purpose Assessment

#### Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or purposes 2 or 4 but performs strongly against purpose 3.

## Wider Green Belt Impacts

## Summary

Overall, the sub-area does play an important role with respect to the strategic land parcel, however if released in isolation is unlikely to significantly harm the performance of the wider Green Belt.

## Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration as RA-26 (including the section of Green Belt land comprised of urban development to the west of the sub-area).

2.6 For site M26, the Green Belt Review assessment found in GB 02.03 - Green Belt Review Annex Proforma Report (2023) on pages 196 to 198, relating to sub-area 41, states:

#### Purpose Assessment

#### <u>Summary</u>

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) nor purpose 4, performs weakly against purpose 2 and performs strongly against purpose 3.

#### Wider Green Belt Impacts

## **Summary**

Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released in isolation, is unlikely to significantly harm the performance of the wider Green Belt.

## Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-25.

2.7 For Site M14, there are effectively two new proposed Green Belt boundaries in the Plan, which are:

Southern boundary – Beesonend Lane Western boundary – well-established hedgerow with mature trees

2.8 For Site M24, there are effectively two new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – Cory-Wright Way (B653)
Eastern and Southern boundary – well-established hedgerow with mature trees

2.9 For Site M26, there are effectively two new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – well-established hedgerow with mature trees Southern boundary – well-established mature trees and the River Lea

2.10 The sites were considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For these locations, the site selection outcomes are set out on pages 12 to 13, 6 to 7 and 9 to 10 in LPSS 02.13 - Green Belt Buffer Sites Not Recommended to Progress CNL Proformas (2024). This is set out in particular in the Qualitative Assessment:

## M14

C-049

Part of the site is recommended for further consideration by the Green Belt Review Stage 2 Report.

. . .

Technical work undertaken by Natural England, regarding the characteristics of land that meets their criteria for an extension to the Chilterns National Landscape into St Albans City & District, includes this site.

This site is not recommended to progress.

## M24

C-255

This site is recommended for further consideration by the Green Belt Stage 2 Report.

. . .

Technical work undertaken by Natural England, regarding the characteristics of land that meets their criteria for an extension to the Chilterns National Landscape into St Albans City & District, includes this site.

This site is not recommended to progress.

## M26

#### C-278

The site is recommended for further consideration by the Green Belt Review Stage 2 Report.

. . .

Technical work undertaken by Natural England, regarding the characteristics of land that meets their criteria for an extension to the Chilterns National Landscape into St Albans City & District, includes this site.

This site is not recommended to progress.

- 2.11 LPCD 03.01 St Albans Local Plan Sustainability Appraisal Report (2024) regarding site M24 and M26 at paragraph 5.4.113 goes on to state:
  - 5.4.113...The other two sites are small sites that are considered to perform quite strongly in wider respects, were it not for the National Landscape constraint.<sup>17</sup>
- 2.12 At the time of completing the site selection work, sites M14, M24 and M26 were not recommended to progress and were excluded from the Draft Local Plan Regulation 19 submission solely because they were due to become part of the Chilterns National Landscape. As the Chilterns National Landscape extension is now no longer progressing, sites M14, M24 and M26 are considered suitable for allocation as stated on page 2 of SADC/ED80A SADC position on Chilterns National Landscape boundary extension cancellation:

## Implications for Sites M14, M24 and M26

- 8. Three of the sites (M14, M24 and M26) removed from the emerging Local Plan prior to its publication under Regulation 19, were only removed on the grounds that they were in an area likely at the time to become part of the Chilterns National Landscape. In all other regards they were considered suitable sites for allocation having been recommended for further consideration as to whether they should be removed from Green Belt by the Stage 2 Green Belt Review 2023 (GB 02.02), and there being no other reason why they should not be considered developable.
- 9. As the extension of the Chilterns National Landscape is now, subsequent to the submission of the Plan, not progressing as a project, there is now no longer any reason for the three sites (M14, M24 and M26) to be excluded from the draft St Albans Local Plan. On the basis of a consistent and justified approach to the allocation of sites for development in the district, the Council would wish to indicate as a Direction of Travel, without prejudice to any future consideration of sites in the Plan, and subject to a Sustainability Appraisal, main modifications to the Plan to include Sites M14, M24 and M26 as allocations within the St Albans Local Plan, and

- to remove the sites from the Green Belt. Appendix 1 of this note sets out how they would appear in Part B of the Local Plan.
- 2.13 Sites M14, M24 and M26 are effective as the Council has engaged with the landowner(s) of the sites and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. These sites were included in the draft Plan at Regulation 18 stage and the relevant bodies responded. These comments have been considered further in proposing these sites to be reincluded as Main Modifications.
- 2.14 Overall, sites M14, M24 and M26 require alterations to the Green Belt Boundary as there is no longer any reason for excluding the three sites from the Plan, and the exceptional circumstances for amending the Green Belt boundary in these locations are considered to exist.
- 2.15 N.B. Sites M14, M24 and M26 include proposed Main Modifications as set out in SADC/ED85A, SADC/ED85B and SADC/ED85C.

# Q3 If the sites are necessary, are they justified, effective and consistent with national planning policy?

- 3.1 Yes, it is considered that sites M14, M24 and M26 are necessary and are justified, effective and consistent with national planning policy.
- 3.2 As answered above in M2I2Q2, sites M14, M24 and M26 are considered to be justified as the general need for Green Belt release as set out in GB 01.01 Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 3.3 GB 02.02 Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in M2I2Q2, for sites M14, M24 and M26, the Green Belt Review assessments can be found in GB 02.03 Green Belt Review Annex Proforma Report (2023).
- 3.4 As set out in M2I2Q2 above, the Site Selection process set out in LPSS 02.13 -Green Belt Buffer Sites Not Recommended to Progress CNL Proformas (2024), the sites were assessed for potential allocation in the Plan but were not recommended to progress as at the time the sites were due to become part of the Chilterns National Landscape.
- 3.5 LPCD 03.01 St Albans Local Plan Sustainability Appraisal Report (2024) regarding site M24 and M26 at paragraph 5.4.113 goes on to state:

#### 5.4.113

...The other two sites are small sites that are considered to perform quite strongly in wider respects, were it not for the National Landscape constraint.<sup>17</sup>

3.6 As the Chilterns National Landscape extension is now no longer progressing, sites M14, M24 and M26 are considered suitable for allocation as stated on page 2 of SADC/ED80A SADC position on Chilterns National Landscape boundary extension cancellation:

#### Implications for Sites M14, M24 and M26

- 8. Three of the sites (M14, M24 and M26) removed from the emerging Local Plan prior to its publication under Regulation 19, were only removed on the grounds that they were in an area likely at the time to become part of the Chilterns National Landscape. In all other regards they were considered suitable sites for allocation having been recommended for further consideration as to whether they should be removed from Green Belt by the Stage 2 Green Belt Review 2023 (GB 02.02), and there being no other reason why they should not be considered developable.
- 9. As the extension of the Chilterns National Landscape is now, subsequent to the submission of the Plan, not progressing as a project, there is now no longer any reason for the three sites (M14, M24 and M26) to be excluded from the draft St Albans Local Plan. On the basis of a consistent and justified approach to the allocation of sites for development in the district, the Council would wish to indicate as a Direction of Travel, without prejudice to any future consideration of sites in the Plan, and subject to a Sustainability Appraisal, main modifications to the Plan to include Sites M14, M24 and M26 as allocations within the St Albans Local Plan, and to remove the sites from the Green Belt. Appendix 1 of this note sets out how they would appear in Part B of the Local Plan.
- 3.7 Sites M14, M24 and M26 are effective as the Council has engaged with the landowner(s) of the sites and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. These sites were included in the draft Plan at Regulation 18 stage and the relevant bodies responded. These comments have been considered further in proposing these sites to be reincluded as Main Modifications.
- 3.8 Sites M14, M24 and M26 are consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01.
- 3.9 Overall, sites M14, M24 and M26 are considered to be justified, effective and consistent with national planning policy.
- 3.10 N.B. Sites M14, M24 and M26 include proposed Main Modifications as set out in SADC/ED85A, SADC/ED85B and SADC/ED85C.

## Q4 Are the additional sites developable within the Plan period?

- 4.1 Yes, the sites M14, M24 and M26 are considered to be developable within the Plan period.
- 4.2 The NPPF sets out in Annex 2: Glossary the definition of 'developable' as:
  - Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
- 4.3 M14 The evidence set out above demonstrates that the site is in a suitable location for housing. The landowner/developer has confirmed that the site is available through their response to the 'Call for sites'; their response to the Local Plan Regulation 18 consultation; their response to the Local Plan Regulation 19 publication and from email and phone correspondence in summer 2025. Viability is addressed in INF 10.01 BNPPRE Local Plan Viability Report SADC (2024), which, in simple terms, sets out that development for this type of site is viable.
- 4.4 SADC/ED80A SADC position on Chilterns National Landscape boundary extension cancellation includes a Transport Impact Assessment at Appendix 2 which sets out:

#### 7 Conclusion

The site will be making significant contributions to the overall Harpenden Settlement Strategy.

There is a reasonable prospect that an LTP compliant access strategy allowing safe and suitable access for all modes is deliverable.

The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety.

Overall there are 'no showstoppers'.

- 4.5 M24 The evidence set out above demonstrates that the site is in a suitable location for housing. The landowner/developer has confirmed that the site is available through correspondence in 2025 and notably the site now has a Committee resolution to grant planning permission, subject to the completion of a legal agreement. Viability is addressed in INF 10.01 BNPPRE Local Plan Viability Report SADC (2024), which, in simple terms, sets out that development for this type of site is viable.
- 4.6 SADC/ED80A SADC position on Chilterns National Landscape boundary extension cancellation includes a Transport Impact Assessment at Appendix 2 which states:

#### 7 Conclusion

The site will be making significant contributions to sustainable travel for Wheathampstead.

There is a reasonable prospect that an LTP compliant access strategy allowing safe access for all modes is deliverable.

The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety.

Overall there are 'no showstoppers'.

- 4.7 M26 The evidence set out above demonstrates that the site is in a suitable location for housing. The landowner/developer has confirmed that the site is available through their response to the 'Call for sites'. Viability is addressed in INF 10.01 BNPPRE Local Plan Viability Report SADC (2024), which, in simple terms, sets out that development for this type of site is viable.
- 4.8 SADC/ED80A SADC position on Chilterns National Landscape boundary extension cancellation includes a Transport Impact Assessment at Appendix 2 which states:

#### 7 Conclusion

The site will be making significant contributions to sustainable travel for Wheathampstead.

An LTP compliant access strategy allowing safe access for all modes is deliverable. The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety.

Overall there are 'no showstoppers'.

# Q5 What are the consequences for allocating the sites on housing land supply, and conversely, the deletion and/or modification of sites subject to flooding?

- 5.1 The consequences for allocating (for sites M14, M24 and M26), deleting and modifying site allocations subject to flooding on the Plan's Housing Land Supply are set out in Table 1 below. This can be summarised as:
  - Sites M14, M24 and M26 are proposed to be allocated as new sites.
  - Sites UC8, UC36, UC43 and UC58 are proposed to be deleted.
  - Sites M20, UC24, UC46, UC53 and UC55 are proposed to be modified.
- 5.2 The net consequences in terms of housing land supply is a modest gain of 60 homes in the Housing Land Supply.

Table 1: Changes to Housing Land Supply for allocated, deleted and modified site allocations relating to Chilterns NL or Flooding

Site Number	Site Allocation Reference	Location	Submitted Local Plan (Regulation 19) Indicative Capacity (Number of Dwellings)	Updated Local Plan Indicative Capacity (Number of Dwellings)	Change between Submitted and Updated Local Plan Indicative Capacities (Number of Dwellings)	Summary Explanation
1	M14	Land at Beesonend Lane, Harpenden, AL5 2AB	0	43	+43	New site allocation M14 added to updated Local Plan Housing Land Supply (site was previously included in Regulation 18 Draft Local Plan but not included in the Regulation 19 submitted Local Plan due to the potential extension of Chilterns National Landscape)
2	M20	Lower Luton Road, Harpenden, AL5 5AF	25	12	-13	Indicative capacity for site allocation M20 modified from 25 dwellings in the Regulation 19 submitted Local Plan to 12 dwellings in the updated Local Plan Housing Land Supply as a result of the Council's Flood Risk Addendum – July 2025 (July 2025) – SADC/ED77
3	M24	South of Codicote Road, AL4 8GD	0	46	+46	New site allocation M24 added to updated Local Plan Housing Land Supply (site was previously included in Regulation 18 Draft Local Plan but not included in the Regulation 19 submitted Local Plan due to the potential extension of Chilterns National Landscape)
4	M26	Highway Chipping Depot, Lower Luton Road, AL4 8JJ	0	7	+7	New site allocation M26 added to updated Local Plan Housing Land Supply (site was previously included in Regulation 18 Draft Local Plan but not included in the Regulation 19 submitted Local Plan due to the potential extension of Chilterns National Landscape)

Site Number	Site Allocation Reference	Location	Submitted Local Plan (Regulation 19) Indicative Capacity (Number of Dwellings)	Updated Local Plan Indicative Capacity (Number of Dwellings)	Change between Submitted and Updated Local Plan Indicative Capacities (Number of Dwellings)	Summary Explanation
5	UC24	Garages Rear of Hill End Lane (North), St Albans, AL4 0AE	8	5	-3	Indicative capacity for site allocation UC24 modified from 8 dwellings in the Regulation 19 submitted Local Plan to 5 dwellings in the updated Local Plan Housing Land Supply as a result of the Council's Flood Risk Addendum – July 2025 (July 2025) – SADC/ED77
6	UC36	Garages off Park Street Lane, Park Street, AL2 2ND	5	0	-5	Deleted Regulation 19 submitted Local Plan site allocation UC36 (for 5 dwellings) removed from the updated Local Plan Housing Land Supply as a result of the Council's Flood Risk Addendum – July 2025 (July 2025) – SADC/ED77
7	UC43	Garage block to west of 32-46 Riverside Road, St Albans, AL1 1SD	5	0	-5	Deleted Regulation 19 submitted Local Plan site allocation UC43 (for 5 dwellings) removed from the updated Local Plan Housing Land Supply as a result of the Council's Flood Risk Addendum – July 2025 (July 2025) – SADC/ED77
8	UC46	Garage Blocks adj. to 76 Oakley Road and 151 Grove Road, Harpenden, AL5 1HJ	6	5	-1	Indicative capacity for site allocation UC46 modified from 6 dwellings in the Regulation 19 submitted Local Plan to 5 dwellings in the updated Local Plan Housing Land Supply as a result of the Council's Flood Risk Addendum – July 2025 (July 2025) – SADC/ED77
9	UC53	Motor Repair Garage, Paynes Yard, Park Street Lane, AL2 2NE	11	9	-2	Indicative capacity for site allocation UC53 modified from 11 dwellings in the Regulation 19 submitted Local Plan to 9 dwellings in the updated Local Plan Housing Land supply as a result of the Council's Flood Risk Addendum – July 2025 (July 2025) – SADC/ED77

Site Number	Site Allocation Reference	Location	Submitted Local Plan (Regulation 19) Indicative Capacity (Number of Dwellings)	Updated Local Plan Indicative Capacity (Number of Dwellings)	Change between Submitted and Updated Local Plan Indicative Capacities (Number of Dwellings)	Summary Explanation
10	UC55	44-52 Lattimore Road, St Albans, AL1 3XW	15	13	-2	Indicative capacity for site allocation UC55 modified from 15 dwellings in the Regulation 19 submitted Local Plan to 13 dwellings in the updated Local Plan Housing Land Supply as a result of the Council's Flood Risk Addendum – July 2025 (July 2025) – SADC/ED77
11	UC58	Cotlandswick Garages B, London Colney, AL2 1EG	5	0	-5	Deleted Regulation 19 submitted Local Plan site allocation UC58 (for 5 dwellings) removed from the updated Local Plan Housing Land Supply as a result of the Council's Flood Risk Addendum – July 2025 (July 2025) – SADC/ED77
Total		162	140	+60		

5.3	The changes set out in Table 1 above have been reflected in the new housing trajectory set out in answer to Matter 2 Issue 1 Question 1 and Main Modifications
	set out in SADC/ED85A and SADC/ED85C.