

## **Matter 9 – Housing Land Supply**

### **Issue 2 – Five-Year Housing Land Supply**

#### **Q1 What will be the five-year housing land requirement upon adoption of the Plan?<sup>3</sup>**

- 1.1 The total five-year housing land requirement upon estimated adoption of the Plan on 1 April 2026 is 3,150 dwellings (630 dwellings per year) from 2026/27 to 2030/31 in years 1 to 5 (post adoption). This requirement is set out in the Council's response to Matter 2 Issue 1 Question 1 and the proposed Main Modifications in SADC/ED85A and SADC/ED85C.

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

- 2.1 Based on the updated housing trajectory included in response to Matter 2 Issue 1 Question 1, a total of 3,789 net dwellings are expected to be delivered in the first five years following the estimated adoption of the Plan in March 2026, from 2026/27 to 2030/31. This amounts to 758 net dwellings per year from 2026/27 to 2030/31. The housing land supply of 3,789 net dwellings in years 1 to 5 (post adoption) includes a 20% buffer against the updated total stepped annual housing requirement of 3,150 dwellings (630 dwellings per year) for this period. A 20% buffer has been applied to the five-year housing land supply in accordance with NPPF paragraphs 69 and 77, as the authority's 2022 and 2023 Housing Delivery Test measurements were both below 85% of the Housing Delivery Test's housing requirements.

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

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

- 3.1 The Council has used reliable evidence to determine which sites will come forward for development and when in the Plan's updated housing land supply and trajectory, as set out in response to Matter 2 Issue 1 Question 1. The Council's approach to housing build out rates in the submitted Plan's housing land supply and trajectory was set out in HOU 01.02 SADC Housing Land Supply, Windfall & Capacity Evidence Paper (2024) (see section 6, pages 4-5).
- 3.2 The Council initially used evidence on housing delivery from the Lichfields 'Start to Finish (third edition)' 2024 report to determine which sites will come forward for development and when. This report examined historic housing delivery in England

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<sup>3</sup> Please also refer to Matter 2, Issue 1, Question 1

and Wales (outside London) between 1996/97 and 2022/23. It assessed the lead in times of housing sites, which refers to the stages in the planning and delivery process that take place before housing is completed. The report also analysed the average (mean and median) annual housing delivery of a sample of 179 housing sites of various sizes. To summarise, there is a correlation between lead in times, build out rates and the size of housing sites; smaller housing sites have shorter lead in times and lower build out rates, whereas larger housing sites have longer lead in times and higher build out rates.

- 3.3 The Council subsequently updated the Plan's housing land supply and trajectory from July to September 2025, in response to Matter 2 Issue 1 Question 1. First, updated evidence from the Council's internal planning records about the deliverability and developability of individual housing sites (allocations, permissions and applications) was assessed, with reference to national policy and guidance on housing supply and delivery. This updated evidence related to each site's current planning status and included new up to date discussions with landowners / developers and exchanges of emails in summer 2025, records from pre-applications, planning performance agreements, planning applications (such as scoping opinions, full, outline and reserved matters) and Regulation 18 and 19 consultation responses.
- 3.4 As well as the new up to date discussions with landowners / developers and exchanges of emails in summer 2025, written requests for updated information and evidence about the deliverability and developability of housing sites were sent to some site promoters (landowners, developers and housebuilders) for sites where landowners / developers did not respond to phone calls and updated evidence was not available from the Council's internal planning records. Some of the promoters who responded provided relevant updated written information and evidence about their site's housing delivery. This included: estimated timescales for application submission, determination and implementation, delivery intentions, anticipated start and build out rates, site assessment work, land ownership and relevant funding. Officers also held a meeting with colleagues from the Council's Estates Team in summer 2025 to discuss evidence related to the estimated housing delivery of site allocations on land in the Council's ownership.
- 3.5 The Council then evaluated evidence from these sources to determine when they would come forward in the Plan's updated housing land supply and trajectory, as set out in response to Matter 2 Issue 1 Question 1. Sites (allocations, permissions and applications) were included in years 1 to 5 (post adoption) from 2026/27 to 2030/31, where they met the NPPF definition of deliverable and relevant evidence of deliverability (as set out in national guidance) was available. Sites were included in years 6 to 15 (post adoption) from 2031/32 to 2040/41, where they met the NPPF definition of developable and relevant evidence of developability (as set out in national guidance) was available.
- 3.6 It should be noted that there is a bespoke approach to build out rates for the Hemel Garden Communities (HGC) housing site allocations because of the unique scale and nature of the HGC programme (11,000 homes). Updated evidence of lead-in

times and build out rates for HGC sites allocations H1, H2 and H4 are set out in the Council's response to Matter 6 Issue 6 Questions 3 and 4.

#### Is it robust?

- 3.7 Yes, the Council considers that robust evidence has been used to determine which sites will come forward for development and when in the Plan's updated housing land supply and trajectory, as set out in response to Matter 2 Issue 1 Question 1. The Lichfields 'Start to Finish (third edition)' 2024 report and internal Council planning records are valid, reliable and up-to date sources of evidence which informed housing delivery. Moreover, new up to date discussions with landowners / developers and exchanges of emails in summer 2025, as well as written evidence from site promoters, provided further context and up-to-date information about housing delivery for particular sites. The Council followed national policy and guidance on housing delivery when using relevant evidence to inform the build out rates of individual housing sites and assess if they were deliverable or developable.

#### **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?**

- 4.1 Yes, where sites have been identified in the Plan, but do not yet have planning permission, there is considered to be clear evidence that housing completions will begin within five years as required by the Framework. In the updated housing trajectory set out in response to Matter 2 Issue 1 Question 1, there are some sites included in years 1 to 5 (post adoption) from 2026/27 to 2030/31 which do not yet have planning permission. Where there is clear evidence, these sites are included in the two Housing Trajectory categories: (1) for Part B Local Plan site allocations and (2) applications with Committee resolutions to grant permission subject to Section 106 agreement completion.
- 4.2 The Council considers that there is clear evidence that these individual sites included in the five-year housing land supply were deliverable, even though they do not yet have planning permission. This evidence followed NPPF paragraphs 69 and 77, the definition of a deliverable site in the NPPF glossary and Planning Practice Guidance on housing supply and delivery (Paragraph: 007 Reference ID: 68-007-20190722):

#### NPPF

***Deliverable:*** *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

*a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until*

*permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

## **PPG**

### **What constitutes a ‘deliverable’ housing site in the context of plan-making and decision-taking?**

*In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. [Annex 2 of the National Planning Policy Framework](#) defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:*

- have outline planning permission for major development;*
- are allocated in a development plan;*
- have a grant of permission in principle; or*
- are identified on a brownfield register.*

*Such evidence, to demonstrate deliverability, may include:*

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- firm progress with site assessment work; or*
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

*Plan-makers can use the [Housing and Economic Land Availability Assessment](#) in demonstrating the deliverability of sites.*

*Paragraph: 007 Reference ID: 68-007-20190722*

*Revision date: 22 07 2019*

- 4.3 A summary of relevant evidence of deliverability for sites included in the five-year housing land supply, which do not yet have planning permission, in the updated Local Plan housing trajectory is set out in Table 1 below.

**Table 1: Evidence of deliverability for sites identified in the Plan which do not yet have planning permission**

|   | Site Reference Number | Planning Application Reference Number(s) | Site Name / Address                                  | Estimated Gains (Net) | Estimated Net Dwellings to be Completed in Years 1-5 (post adoption) (2026/27 - 2030/31) | Evidence of Site Deliverability Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---|-----------------------|------------------------------------------|------------------------------------------------------|-----------------------|------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | B7                    | 5/2023/0327                              | Land At Cooters End Lane And Ambrose Lane, Harpenden | 492                   | 210                                                                                      | The Council's Development Management Committee meeting on 17/02/2025 resolved to grant permission for outline application 5/2023/0327 at site for 492 dwellings subject to Section 106 agreement completion. Significant progress has been made with the S106 agreement and it is expected by both SADC and the agent to be completed and permission issued in December 2025. The Council signed a Planning Performance Agreement with the site's developer in July 2024. Site developer discussed and provided further written evidence via email related to application determination and implementation, delivery intentions, anticipated start and build out rates, and site assessment work in summer 2025. |
| 2 | M17                   | 5/2022/2748                              | Land North of Wheathampstead Road, Harpenden         | 40                    | 40                                                                                       | The Council's Development Management Committee meeting on 11/12/2024 resolved that application 5/2022/2748 at site be granted conditional planning permission subject to the completion of a Section 106 agreement. Significant progress has been made with the S106 agreement and it is expected to be completed and permission issued in December 2025. Site developer provided further written evidence via email related to application determination and implementation, delivery intentions, and anticipated start and build out rates in summer 2025.                                                                                                                                                     |

|   | Site Reference Number | Planning Application Reference Number(s) | Site Name / Address          | Estimated Gains (Net) | Estimated Net Dwellings to be Completed in Years 1-5 (post adoption) (2026/27 - 2030/31) | Evidence of Site Deliverability Summary                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---|-----------------------|------------------------------------------|------------------------------|-----------------------|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | H1                    | N/A                                      | North Hemel Hempstead        | 1,125                 | 50                                                                                       | Screening Opinion application 5/2025/0645 at site submitted for an outline application for 1,500 dwellings. The Council signed a Planning Performance Agreement with the applicant in February 2025. A 2025 pre-application process is underway for site H1. The planning application is due to be submitted in autumn/winter 2025. See Council's responses to Matter 6 Issue 6 Questions 3 and 4, as well as Matter 6 Issue 7 Question 6.                                 |
| 4 | H2                    | N/A                                      | East Hemel Hempstead (North) | 1,235                 | 100                                                                                      | The Council signed three Planning Performance Agreements with the site's applicant in July and August 2024, September and October 2024, and March and April 2025. The planning application is due to be submitted in autumn/winter 2025. See Council's responses to Matter 6 Issue 6 Questions 3 and 4, as well as Matter 6 Issue 8 Question 6.                                                                                                                            |
| 5 | H4                    | N/A                                      | East Hemel Hempstead (South) | 1,940                 | 125                                                                                      | The Council signed three Planning Performance Agreements with the site's applicant in July and August 2024, September and October 2024, and March and April 2025. The planning application is due to be submitted in autumn/winter 2025. See Council's responses to Matter 6 Issue 6 Questions 3 and 4, as well as Matter 6 Issue 10 Question 5.                                                                                                                           |
| 6 | B1                    | N/A                                      | North St Albans              | 1,044                 | 180                                                                                      | Outline application 5/2024/2271 at site for 1,000 dwellings and 80 C2 units was validated on 26/02/2025 with a decision pending as at 01/10/2025. Site developer discussed and provided further evidence related to application determination, delivery intentions, and anticipated start and build out rates. Significant progress has been made with the S106. The Council signed a Planning Performance Agreement with the site's applicant and landowners in May 2024. |

|    | Site Reference Number | Planning Application Reference Number(s) | Site Name / Address                              | Estimated Gains (Net) | Estimated Net Dwellings to be Completed in Years 1-5 (post adoption) (2026/27 - 2030/31) | Evidence of Site Deliverability Summary                                                                                                                                                                                                                                                                                                                                                                                                |
|----|-----------------------|------------------------------------------|--------------------------------------------------|-----------------------|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7  | B2                    | N/A                                      | North East Harpenden                             | 738                   | 140                                                                                      | Screening Opinion application 5/2025/0362 at site for 100 dwellings. Screening Opinion application 5/2024/1602 at site for 520 dwellings and 60 C2 units. The Council signed Planning Performance Agreements with the site's applicants in March 2025 and pre-application processes are advanced for both sites.                                                                                                                       |
| 8  | B4                    | N/A                                      | East St Albans                                   | 511                   | 299                                                                                      | Screening Opinion application 5/2025/0741 at site for 472 dwellings and 90 C2 units. The Council signed a Planning Performance Agreement with the site's applicant in February and March 2025. Site developer discussed and provided further written evidence via email related to application determination, delivery intentions, and anticipated start and build out rates. Application anticipated to be submitted in October 2025. |
| 9  | L1                    | N/A                                      | Burston Nurseries, North Orbital Road, St Albans | 180                   | 50                                                                                       | A pre-application process for the site was undertaken in 2025 with the applicant. Site developer discussed and provided further written evidence via email related to delivery intentions and anticipated start and build out rates.                                                                                                                                                                                                   |
| 10 | L3                    | N/A                                      | East and West of Miriam Lane, Chiswell Green     | 101                   | 100                                                                                      | Outline application 5/2025/1359 at site for demolition of existing buildings and development of up to 166 dwellings and a 96 room care home (Use Class C2) validated on 01/08/2025 and decision pending as at 01/10/2025. Screening Opinion application 5/2025/1374 for residential dwellings and a residential care home (use Class C2). A pre-application process for the site was undertaken in 2024.                               |
| 11 | M7                    | N/A                                      | Townsend Lane, Harpenden                         | 65                    | 40                                                                                       | The Council signed a Planning Performance Agreement with the site's applicant in May 2025 and a pre-application process is underway.                                                                                                                                                                                                                                                                                                   |

|    | Site Reference Number | Planning Application Reference Number(s) | Site Name / Address                         | Estimated Gains (Net) | Estimated Net Dwellings to be Completed in Years 1-5 (post adoption) (2026/27 - 2030/31) | Evidence of Site Deliverability Summary                                                                                                                                                                                                                                                                                                                                                               |
|----|-----------------------|------------------------------------------|---------------------------------------------|-----------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12 | M8                    | N/A                                      | Verulam Golf Club, St Albans                | 65                    | 65                                                                                       | A pre-application process for the site was undertaken in 2022. Site developer discussed and provided further evidence related to estimated application submission timescales, delivery intentions and site assessment work in summer 2025.                                                                                                                                                            |
| 13 | M10                   | N/A                                      | Tippendell Lane and Orchard Drive, How Wood | 51                    | 40                                                                                       | Site developer discussed and provided further evidence related to estimated application submission timescales, delivery intentions and site assessment work in summer 2025. Application expected in first half of 2026.                                                                                                                                                                               |
| 14 | M15                   | N/A                                      | Bucknalls Drive, Bricket Wood               | 44                    | 30                                                                                       | Site developer discussed and provided further written evidence via email related to estimated application submission timescales, delivery intentions and land ownership in summer 2025.                                                                                                                                                                                                               |
| 15 | M16                   | N/A                                      | Falconers Field, Harpenden                  | 39                    | 30                                                                                       | A pre-application process was undertaken in 2025.                                                                                                                                                                                                                                                                                                                                                     |
| 16 | M20                   | N/A                                      | Lower Luton Road, Harpenden                 | 12                    | 12                                                                                       | A pre-application process was undertaken in 2025. Site developer discussed and provided further written evidence via email related to estimated application submission timescales, delivery intentions and land ownership in summer 2025.                                                                                                                                                             |
| 17 | M22                   | N/A                                      | Wood End, Hatching Green, Harpenden         | 15                    | 15                                                                                       | A pre-application process was undertaken in 2025. Site developer provided further written evidence via email related to delivery intentions in summer 2025.                                                                                                                                                                                                                                           |
| 18 | M24                   | N/A                                      | South of Codicote Road, Wheathampstead      | 46                    | 45                                                                                       | Council's Development Management Committee meeting on 19/05/2025 resolved that full application 5/2024/1508 for 46 dwellings at site be granted conditional planning permission subject to the completion of a Section 106 agreement. Significant progress has been made with the S106 agreement and it is expected by both SADC and the agent to be completed and permission issued in December 2025 |
| 19 | M25                   | N/A                                      | Baulk Close, Harpenden                      | 8                     | 8                                                                                        | Site developer provided further written evidence via email related to estimated application submission timescales and delivery intentions in summer 2025.                                                                                                                                                                                                                                             |

|              | Site Reference Number | Planning Application Reference Number(s) | Site Name / Address                                          | Estimated Gains (Net) | Estimated Net Dwellings to be Completed in Years 1-5 (post adoption) (2026/27 - 2030/31) | Evidence of Site Deliverability Summary                                                                                                                                                                              |
|--------------|-----------------------|------------------------------------------|--------------------------------------------------------------|-----------------------|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 20           | UC5                   | N/A                                      | 18-20 Catherine Street, St Albans                            | 33                    | 30                                                                                       | Full application 5/2024/1007 at site for 48 dwellings validated on 23/07/2024 and decision pending as at 01/10/2025.                                                                                                 |
| 21           | UC7                   | N/A                                      | 5 Spencer Street, St Albans                                  | 52                    | 52                                                                                       | The Council signed a Planning Performance Agreement with the site's developer in September 2024 and a pre-application process is underway.                                                                           |
| 22           | UC28                  | N/A                                      | New Greens Residents Association, 2 High Oaks, St Albans     | 10                    | 10                                                                                       | A pre-application process for the site was undertaken in 2025.                                                                                                                                                       |
| 23           | UC30                  | N/A                                      | Garages Between Abbots Avenue West and Abbey Line, St Albans | 5                     | 5                                                                                        | Full application 5/2025/0079 at site for 4 dwellings granted permission on 04/06/2025.                                                                                                                               |
| 24           | UC54                  | N/A                                      | Harpenden Railway Station Car Park East, Harpenden           | 94                    | 40                                                                                       | Screening Opinion application 5/2024/0796 at site for 100 dwellings. The Council signed a Planning Performance Agreement with the site's developer in May 2024 and a pre-application process was undertaken in 2024. |
| <b>Total</b> |                       |                                          |                                                              | <b>7,945</b>          | <b>1,716</b>                                                                             |                                                                                                                                                                                                                      |

**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?**

What allowance has been made for windfall sites as part of the anticipated five-year housing land supply?

- 5.1 The allowance made for windfall sites as part of the anticipated five-year housing land supply is 508 net dwellings from 2026/27 to 2030/31 in years 1 to 5 (post adoption). This includes an annual windfall allowance of 145 net dwellings per year from years 3 to 5 (post adoption) from 2028/29 to 2030/31 and half of the annual windfall allowance (73 net dwellings) in year 2 (post adoption) in 2027/28. This windfall allowance is included in the Council's updated Local Plan housing trajectory set out in response to Matter 2 Issue 1 Question 1 (see Table 1).
- 5.2 The Council has taken a conservative approach to windfall, by excluding the windfall allowance from year 1 (post adoption) in 2026/27 and including half of the annual windfall allowance (73 net dwellings) in year 2 (post adoption) in 2027/28. This is because most homes that are estimated to be completed in this period are likely to already be known. The Council has also taken a similar approach to including windfall in its most recently published annual five-year housing land supply position (as at 1 April 2024) in SADC/ED71 Annual Monitoring Report 1 April 2023 - 31 March 2024.

Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by the Framework?

- 5.3 Yes, it is considered that there is compelling evidence to suggest that windfall sites will come forward over the plan period, as required by the Framework. The inclusion of the windfall allowance in the housing land supply in the updated Local Plan housing trajectory is justified, as it provides a reliable source of supply. The Council considers that it is taking a relatively conservative approach to windfall in the housing trajectory that is realistic and based on strong recent evidence of historic windfall delivery rates in St Albans. This evidence is set out in further detail in the Council's response to Matter 9 Issue 1 Question 2.

**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?**

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?

- 6.1 Firstly, it is considered important to point to the fact that there is strong evidence to support the view that the development of the larger sites, such as the Broad

Locations and sites associated with HGC will come forward as envisaged. The evidence for HGC is set out in detail in the Council's response to Matter 6 Issue 6 Question 5.

6.2 Secondly, it is acknowledged that there is the possibility that HGC or some of the larger sites, such as the Broad Locations, do not deliver at the rates expected. If that were to be the case, the most likely implications for the Plan is that the annual housing requirements would still be met, made up from a combination of:

- Current progress made with planning application processes for other allocated sites, which may come forward more quickly than the updated Housing Trajectory calculations
- Flexibility already built into the Plan
- Additional housing land supply coming forward at the current time in the context of 'Grey Belt'
- Immediate review of the Plan
- Monitoring and review of the Housing Trajectory

6.3 Further detail is set out below.

Current progress made with planning application processes for other allocated sites, which may come forward more quickly than the updated Housing Trajectory calculations

6.4 Across the district, many of the non-HGC allocated sites are in advanced Pre-Planning Application Stage or have submitted planning applications. Table 2 provides an overview of the status of other sites in the Plan, as follows:

**Table 2: Status of non-HGC allocated sites**

|   | <b>Reference Number</b>     | <b>Location</b>                                                                                                    | <b>Status</b>                                    | <b>Net Number of Dwellings</b> |
|---|-----------------------------|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|--------------------------------|
| 1 | 5/2024/2271 (Allocation B1) | North St Albans (Land Off Sandridgebury Lane And Between The Railway And Harpenden Road, St Albans, Hertfordshire) | Application pending                              | 1,044                          |
| 2 | N/A (Allocation B2)         | North East Harpenden                                                                                               | Pre-Application (Planning Performance Agreement) | 553 (most of allocation)       |
| 3 | 5/2021/3631 (Allocation B3) | West Redbourn (Land At Gaddesden Lane, Redbourn, Hertfordshire, AL3 7DP)                                           | Application pending                              | 300 (most of allocation)       |
| 4 | N/A (Allocation B4)         | East St Albans                                                                                                     | Pre-Application (Planning Performance Agreement) | 511                            |

|              | Reference Number            | Location                                                                                                                                                             | Status                                                                                                              | Net Number of Dwellings |
|--------------|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|-------------------------|
| 5            | N/A (Allocation B6)         | West of London Colney                                                                                                                                                | Pre-Application 2025                                                                                                | 439                     |
| 6            | 5/2023/0327 (Allocation B7) | North West Harpenden (Land At Cooters End Lane And Ambrose Lane, Harpenden)                                                                                          | Application pending – NB: Committee resolution to grant permission, subject to completion of a S106 legal agreement | 492                     |
| 7            | N/A (Allocation L1)         | Burston Nurseries, North Orbital Road, St Albans                                                                                                                     | Pre-Application 2025                                                                                                | 186                     |
| 8            | 5/2025/0531 (Allocation L2) | West of Watling Street, Park Street (Land Between Caravan Site And Watling Street, Park Street, St Albans, Hertfordshire)                                            | Outline planning permission 5/2022/0267, Reserved Matters Pending Application 5/2025/0531                           | 95                      |
| 9            | 5/2025/1359 (Allocation L3) | East and West of Miriam Lane, Chiswell Green (The Noke Hotel, Watford Road And Land East And West Of Miriam Lane, Chiswell Green, St Albans, Hertfordshire, AL2 3DS) | Application pending                                                                                                 | 219                     |
| <b>Total</b> |                             |                                                                                                                                                                      |                                                                                                                     | <b>3,839</b>            |

#### Flexibility already built into the Plan

- 6.5 There is already a sufficient degree of flexibility included in the Plan. This flexibility is reflected in the way the spatial strategy has been structured, allowing for a range of delivery scenarios across the Plan period.
- 6.6 In particular, the updated Housing Trajectory has been updated and re-calibrated, but for some sites is still taking a somewhat cautious and conservative approach. This means that, in practice, a number of the allocated sites may come forward earlier than currently anticipated. The Council deliberately, as a contingency for HGC, has nothing in draft Local Plan Policy to stop non-HGC sites coming forward sooner than as set out in the Housing Trajectory.

#### Additional housing land supply coming forward at the current time in the context of 'Grey Belt'

- 6.7 There is clear evidence of additional housing land supply coming forward at the current time and in the context of 'Grey Belt', this is set out within M6I6Q5 Appendix 1 "Housing Trajectory – Additional Homes Context", as reproduced below.

## **Housing Trajectory – Additional Homes Context**

### **Potential additional non-allocated housing resulting from the introduction of ‘grey belt’**

1. The SADC housing trajectory includes Windfall at 145pa. The Housing Land Supply, Windfall & Capacity Evidence Paper (2024) ([HOU 01.02](#)) sets out in Section 5 ‘Windfall Rate’ the predicted windfall yield by site type based on 2013-2023 data. The windfall figure excludes Green Belt predominantly green field development with a capacity of 5+ homes.
2. A significant contextual factor to bear in mind when considering the Housing Trajectory and the likely amount of other ‘windfall’ development is the impact of the introduction of ‘grey belt’ in the NPPF in December 2024, plus the related guidance of February 2025.
3. In summary there is strong evidence that there are a significant number of Green Belt predominantly green field sites (excluded from windfall calculations as above) which are currently in pre-application discussions or have live planning applications or appeals which may be considered to constitute ‘grey belt’. There is a reasonable likelihood that a significant number of these sites would fall within ‘grey belt’ when applying the February 2025 guidance.
4. To indicate the scale of the potential additional dwellings from this source during the Plan period, the following current pending applications / appeals / pre-application inquiries are for sites which may be considered to constitute ‘grey belt’, some of which are likely to be determined prior to adoption of the draft Local Plan:

|   | <b>Reference Number</b> | <b>Location</b>                                                                               | <b>Status</b>       | <b>Net Number of Dwellings</b> |
|---|-------------------------|-----------------------------------------------------------------------------------------------|---------------------|--------------------------------|
| 1 | 5/2025/1160             | Land East Of Kingsley Green, Harper Lane, Shenley, Radlett, Hertfordshire                     | Pending Application | 200                            |
| 2 | 5/2023/1923             | Land Between The Alban Way And Colney Heath Lane, St Albans, Hertfordshire                    | Pending Application | 190                            |
| 3 | 5/2025/0111             | Land Bounded By The Rivers Colne And Ver And Radlett Road, Frogmore, St Albans, Hertfordshire | Pending Application | 183                            |
| 4 | 5/2024/1752             | Land Rear Of Round House Farm, Roestock Lane, Colney Heath, St Albans, Hertfordshire          | Pending Application | 93                             |
| 5 | 5/2025/1218             | Land Adjacent To Sandridge Garage, Sandridgebury Lane, St Albans, Hertfordshire               | Pending Application | 49                             |
| 6 | 5/2022/0599             | Land To Rear Of 96 To 106 High Street, Colney Heath, Hertfordshire                            | Pending Appeal      | 45                             |

|   | <b>Reference Number</b> | <b>Location</b>                                                                                | <b>Status</b>       | <b>Net Number of Dwellings</b> |
|---|-------------------------|------------------------------------------------------------------------------------------------|---------------------|--------------------------------|
| 7 | 5/2024/2007             | Land Between The White Barn And 42 Tollgate Road, Colney Heath, St Albans, Hertfordshire       | Pending Application | 30                             |
| 8 | 5/2024/2293             | Land Rear Of Noke Side & Long Fallow And 4 Noke Side, Chiswell Green, St Albans, Hertfordshire | Pending Application | 26                             |
| 9 | N/A                     | A Green Belt greenfield site near Redbourn                                                     | Pre-Application     | 900                            |
|   |                         |                                                                                                | <b>Total</b>        | <b>1,716</b>                   |

### Immediate review of the Plan

- 6.8 As set out in the NPPF 2024, there is the expectation that the Council would commit to an immediate review of the Plan, following adoption. As set out in SADC/ED85C main modification table, the Council is committed to an early review of the Plan. Therefore, subsequent Local Plans will seek to update and review build-out rates and permissions.

### Monitoring & Review of the Housing Trajectory

- 6.9 Regarding the Housing Trajectory, the Plan includes a Monitoring Framework including indicators to monitor the delivery and supply of housing. This can be found at Appendix 6 – Monitoring Framework of The Reg 19 Local Plan Part A (2024) (LPCD 02.01) on pages 162:

#### 1 – A Spatial Strategy for St Albans City and District Policy

SP1 – A Spatial Strategy for St Albans District

#### Proposed Measures/ Indicators

Net additional dwellings completed

#### Target

Adopted LP requirements

...

#### 3 – Sustainable Use of Land and Green Belt Policy

SP3 – Land and the Green Belt

#### Proposed Measures/ Indicators

Net additional dwellings completed

#### Target

Adopted LP requirements

#### 3 – Sustainable Use of Land and Green Belt Policy

*SP3 – Land and the Green Belt*

*Proposed Measures/ Indicators*

*Five year land supply (estimated dwelling numbers)*

*Target*

*Adopted LP requirements*

Is there sufficient flexibility to ensure that the Plan will not become out of date?

- 6.10 Yes, it is considered that there is sufficient flexibility to ensure that the Plan will not become out of date. Please see answers given above for the justification.