

Maria Stasiak, Decision Officer
Department for Levelling Up, Housing &
Communities
Planning Casework Unit
3rd Floor Fry Building
2 Marsham Street
London
SW1P 4DF

Dear Ms Stasiak,

**Appeals by Alban Developments Ltd and Alban Peter Pearson, CALA Homes (Chiltern) Ltd and Redington Capital Ltd, Headlands Way Limited
Site Addresses: Land North of Chiswell Green Lane, Chiswell Green, St Albans and Land South of Chiswell Green Lane, Chiswell Green, St Albans
Appeal Refs: APP/B1390/W/22/3312277 and APP/B1390/W/22/33130110**

In response to your letter dated 18 January 2024 regarding the above appeals, we write to provide comments on the revised National Planning Policy Framework (NPPF), published in December 2023 and the 2022 Housing Delivery Test figures, also published in December 2023.

The Council does not consider that the changes to the NPPF have a material impact on the cases it put at the Inquiry.

The revised NPPF introduced a new requirement for some local planning authorities to annually identify and update a four year housing land supply position, applying for two years from the revised Framework's publication. Paragraphs 77 and 226 of the NPPF state that this requirement applies to certain authorities which have an emerging Local Plan that has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need. St Albans City and District Council published its emerging draft Local Plan 2041 (which included both a policies map and proposed site allocations towards meeting housing need) for a Regulation 18 consultation, held between 12 July and 25 September 2023. As such, a four-year supply of housing is required to be demonstrated by the Council in accordance with paragraphs 226 and 77 of the NPPF. Neither criteria (a) or (b) of paragraph 76 of the NPPF are engaged.

The Council has updated its four year housing land supply schedule and considers that, at a baseline date of 1 April 2023 and including the relevant 20% buffer, there is approximately 1.7 years supply (42.5% of housing land supply requirement + 20% Buffer). As such, the Council is unable to demonstrate a four year supply of deliverable housing sites and therefore the operation of footnote 8 of the NPPF

insofar as it relates to housing land supply remains as it was at the time the Inquiry concluded.

Similarly, the Council's housing delivery test ("HDT") result for 2022 is 55%, compared with 69% in 2021. However, the HDT consequences in terms of footnote 8 of the NPPF are the same for both the 2022 and 2021 results. The operation of paragraph 11 and footnote 8 in these appeals therefore remains unchanged.

None of the other changes to the NPPF are considered relevant to decision-making in these appeals.

Yours sincerely

George Burgess
Principal Planning Officer