

Additional Documents Consultation on St Albans City and District Local Plan
4th July 2025 – 22nd August 2025

Introduction

- 1.1 Following the Local Plan Stage 1 Hearings (29th April – 1st May 2025), the Inspectors¹ requested that St Albans City and District Council ('StADC') provide further supporting information to address concerns raised at the Stage 1 hearing and to enable matters to progress to the Stage 2 Hearings, anticipated to be held in the Autumn 2025. The Inspectors confirmed, in their post Stage 1 Hearing Note dated 27th June 2025 that this additional documentation was critical to assessing the suitability and deliverability of key proposed strategic allocations in the Local Plan including the growth proposed at Hemel Garden Communities.
- 1.2 Consequently, StADC published for consultation (on 4th July 2025), additional material on the following topic areas:
 - Transport Modelling
 - National Landscape
 - Flood Risk
 - Green Belt Previously Developed Land
 - Site Sifting
 - Gypsies, Travellers and Travelling Show People
- 1.3 On transport and highways matters, the StADC consultation documents include:
 - SADC/ED76
 - SADC/ED76A
 - SADC/ED76A.i
 - SADC/ED76A.ii
 - SADC/ED76B
 - SADC/ED76B.i
 - SADC/ED76C
 - SADC/ED76C.i
 - SADC/ED76C.ii
 - SADC/ED76C.iii
 - SADC/ED76C.iv
 - SADC/ED76C.v
 - SADC/ED76.vi
 - SADC/ED76C.vii
 - SADC/ED76C.viii
 - SADC/ED76C.ix
 - SADC/ED76C.x
 - SADC/ED76C.xi
 - SADC/ED76C.xii
 - SADC/ED76C.xiii
 - SADC/ED76C.xiv
 - SADC/ED76C.xv
 - SADC/ED76C.xvi
- 1.4 On other matters the StADC additional consultation documents include:
 - SADC/ED77 – Flood Risk Addendum
 - SADC/ED78 – Green Belt PDL
 - SADC/ED79 - G&T
 - SADC/ED80A & SADC/ED80B – Chilterns National Landscape
 - SADC/ED81 – Site Sifting Process
 - SADC/ED81A - HELAA
 - SADC/ED81B – UCS
- 1.5 Overview
This consultation response to the Additional Documents Consultation exercise has been prepared by Urbanissta Ltd on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust

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('LAT') in relation to the Land at North East Redbourn ('Site'). It supplements, updates and in some instances relies upon the material prepared and submitted at Regulation 18 and 19 stages of the draft Local Plan and builds upon the MIQ submissions (oral and written) made with respect to Matters 1 – 3 of the Examination ('LIH/LAT Submissions') before, during and after the Stage 1 hearing sessions, including submissions made on the 11th June 2025 regarding the duty to cooperate. Collectively, these submissions are referred to in this consultation response as the "LIH/LAT Submissions"².

- 1.6 Specifically, this consultation response comments upon the further information produced by StADC regarding the following additional documentation namely, the:
 - Highways and Transport (SADC/ED76 and SADC/ED76A through to Cxvi);
 - Flood Risk Addendum (SADC/ED77); and
 - Site Sifting Process Addendum (SADC/ED81, SADC/ED81A and SADC/ED81B)
- 1.7 LIH is a strategic development company that acquires land and is the promoter partner of the Site owners, LAT. The Site has been deemed surplus to LAT's operational requirements and is available to provide longer term funding to support LAT. Together LIH and LAT seek to secure the release of the Site from the Green Belt for a residential led development scheme. The Site is an omission site and is grey belt capable of meeting the Golden Rules as defined by the NPPF (2024) and has been accepted by StADC in its pre application response for the proposed development of the Site dated 23rd May 2025.
- 1.8 The LIH/LAT Submissions², to date, have highlighted (individually and collectively) a wide range of concerns in respect, among other things, of the robustness and rigour undertaken by StADC in respect of the Local Plan's evidence base and formulation, particularly with respect to the assumptions that underpin the land supply and site allocation assumptions of the Local Plan. Other concerns have also been raised (orally and in writing) in relation to compliance with the specified legal requirements and other soundness issues as are set out in detail in the LIH/LAT Submissions.
- Highways and Transport (SADC/ED76 and SADC/ED76A through to Cxvi)
- 1.9 With regards to transport and highways matters (all items for SADC/ED76 including SADC/ED76A through to SADC/ED76Cxvi) we have undertaken an initial review of the transport evidence and associated modelling.
- 1.10 Whilst noting some elements of the assessment, we have identified potential concerns regarding baseline assumptions, mode split application, and the delivery timing of key infrastructure required to support the Hemel Garden Communities proposals.
- 1.11 There are several areas of uncertainty on which additional clarity is required including aspects such as:
 - The timescale for the delivery of the Strategic Road Network improvements and relationship to the delivery and viability of key land allocations in the existing Local Plan at Hemel Garden Communities (not in the subsequent period).
 - National Highways position on the phasing and timescale and mitigations required for the Strategic Road Network improvements.
 - Relationship between the StADC and Dacorum aspects of the HGC project and their associated strategic infrastructure requirements.
- 1.12 It is considered that additional detail and clarity is required in respect of these aspects for an accurate assessment to be undertaken of all the SADC/ED76 associated material. This evidence is required in advance of the Stage 2 hearings.
- 1.13 We therefore reserve our position on these matters and may provide further evidence and commentary as part of, or following, the Stage 2 hearings when additional clarity is available.

² LIH/LAT Submissions:

- Regulation 19 - St Albans Technical Submission - Final Draft - 7th November 2024 and associated material listed in paragraph 2.1 & 2.4 p8;
- Regulation 18 - St Albans Technical Submission - Final Submission - 25th Sept 23 and associated material listed paragraph 1.6 p8 and Identified Sites Deliverability Assessment (September 2023).
- Town Legal Letter to StADC 18th June 2024
- Appendix 3 - Green Belt Appraisal & Landscape Analysis 07 November 2024
- MIQ's Submissions Matters 1, 2 and 3 – 14th April 2025.
- Hearing Statement 11th June 2025 on Duty to Cooperate

- Flood Risk Addendum (SADC/ED77)
- 1.14 The production of the Flood Risk Addendum (SADC/ED77) and the retrospective amendment of the capacity of several urban capacity sites is another visible demonstration of a lack of any or any sufficient comprehensive constraint assessment of sites included as part of the Council's land supply. The amendment of the site's capacity undermines the potential reliability of wider assumptions on a range of sites proposed to be allocated in the draft Local Plan.
- 1.15 In the LIH Submissions¹ (in particular, Regulation 18 - Identified Sites Deliverability Assessment (September 2023)) the lack of any or any sufficient regard to a range of technical constraints in relation to several categories of sites were identified, including:
- Hemel Garden Community
 - Broad Locations
 - Large Sites
 - Medium and Small Sites
 - Greenbelt PDL
 - HELAA Sites
 - UCS Sites
- 1.16 These concerns were reiterated in the LIH/LAT Submissions at Regulation 19 stage³.
- 1.17 The production of the Flood Risk Addendum (SADC/ED77) and the amendment of the capacity of several urban capacity sites is a demonstration of a lack of comprehensive constraint assessment of sites included as part of the Council's land supply. The amendment of the site's capacity undermines the potential reliability of wider assumptions on a range of sites in the Plan.
- 1.18 We return to this matter in respect of the Site Sifting Process (SADC/ED81, SADC/ED81A and SADC/ED81B).
- Site Sifting Process Addendum (SADC/ED81, SADC/ED81A and SADC/ED81B)
- 1.19 Paragraph 1.10 of the Site Sifting Process Addendum indicates that a "*comprehensive, thorough and consistent*" approach to site sifting has been undertaken. The LIH/LAT Submissions² show that this has evidently not been the case, and this is further demonstrated by the Flood Risk Addendum (SADC/ED77) consultation reducing the capacity of sites in areas of flood risk. Clearly, inconsistencies have arisen, necessarily undermining the robustness of the Local Plan's land supply position.
- 1.20 In the LIH/LAT Submissions² (in particular, Regulation 18 - Identified Sites Deliverability Assessment (September 2023)) inconsistencies and concerns in relation to supply side elements were also highlighted, including in respect of the following:
- HELAA sites - significant deliverability constraints
 - UCS Site – significant over allowance of supply from this source
 - Wider concerns in respect of other supply sources as detailed at 1.12 above.
- 1.21 In the LIH/LAT Submissions² in particular, paragraphs 2.31 – 2.45 of the LIH Regulation 18 Technical Submission - Final Submission - 25th Sept 23, which highlight concerns regarding the transparency, accuracy of application of constraints analysis and sought clarity as to the conclusions reached on sites included - or discounted - at the proforma stage.
- 1.22 These concerns were replicated in the LIH/LAT Regulation 19 submissions². To date these matters have not been sufficiently explained or set out by StADC.
- 1.23 The Site Sifting Process Addendum (SADC/ED81, SADC/ED81A and SADC/ED81B) states that StADC has ensured that they have left '*..... no stone unturned*'; however as set out in respect of Flood Risk Addendum (SADC/ED77) some stones clearly have been left unturned as sites have been allocated in areas of flood risk or sites affected by wider technical constraints. It is evident that the approach to site sifting and identification has not been undertaken on a sufficiently robust basis to substantiate new housing allocations or an accurate housing land supply position.

³ Regulation 19 - St Albans Technical Submission - Final Draft - 7th November 2024 including paragraphs 2.1, 3.14, 4.1, 4.2, 4.16, 4.69, 4.88

- 1.24 Wider constraint issues and inconsistencies, which have previously been identified in the LIH/LAT Submissions have not been satisfactorily addressed in the Site Sifting Process Addendum and related documents (SADC/ED81, SADC/ED81A and SADC/ED81B).
- 1.25 Overall, and for the reasons summarised above and in the LIH/LAT Submissions, it Is LIH/LATs position that the additional documents submitted by StADC do not address either (a) the significant deficiencies with the draft Local Plan and Its underlying evidence base which are set out In Its representations and/or (b) the significant concerns raised by the Inspectors at and following the Stage 1 hearings stage.

18th August 2025