



# **St Albans City & District Council Local Plan Examination – Matter 1**

Land at London Road, St Albans

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## St Albans City & District Council Local Plan Examination – Matter 1

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# 1 Introduction

- 1.1.1 This statement has been prepared by Stantec on behalf of Catesby Estates pursuant to Matter 1 Legal Compliance of the St Albans City & District Local Plan Examination. This follows representations to both the Regulation 18 and Regulation 19 Local Plan consultations in relation to Catesby Estates' land interest at Land South of London Road, St Albans (labelled as Land East of Napsbury Lane within the HELAA). The site is labelled as SA-25-21 within the HELAA. Please note previous comments were made in the name of L&Q Estates, who has recent been purchased by Catesby Estates.
- 1.1.2 The main parcel of the site is located north of the London Road Cemetery, on land between London Road and Highfield Park Drive. This parcel has an area of 14.22 hectares, and is predominantly in agricultural use. The site is generally flat, with a very gentle fall from north to south. It has good planting around its boundaries, and has a school (Samuel Ryder Academy) to the north and the built form of Birklands Park and New House Park to the west. The site is considered to have a capacity for approximately 300 dwellings in a sustainable location on the edge of St Albans.
- 1.1.3 The site also includes land to the south of the London Road Cemetery, and further land to the western side of London Road adjacent to the junction of London Road and the A414. Details of the site and proposals are set out in the Vision Document that supports the previous consultation responses.
- 1.1.4 The site remains immediately available and is considered suitable and deliverable.

## 2 Matter 1

### 2.1 Issue 2 – Public Consultation

Q2: How has the Council taken into account representations made in response to public consultation?

- 2.1.1 Concerns were expressed within the Regulation 19 response that the Council had already voted to submit the Local Plan for Examination in its Regulation 19 version form at a Full Council Committee on 16 October 2024. The Regulation 19 consultation did not end until 7 November 2024.
- 2.1.2 It is unclear how the Council have considered the many consultation responses received to the Regulation 19 consultation. Given the Plan was supported prior to the review of any of the comments, it is not considered possible that those Regulation 19 comments have been taken into account.

### 2.2 Issue 3 – Sustainability Appraisal

Q2. Do any of the spatial options test a scale of housing growth that would enable affordable housing needs to be met in full? If not, what are the reasons why?

- 2.2.1 The Local Plan seeks to provide 14,603 dwellings within the period of 1 October 2024 to March 2041 at an average of 885 dwellings per annum. Policies LG1, LG4 and HOU2 confirm that for sites of 10 dwellings or more, affordable housing will be sought at 40%.
- 2.2.2 The South West Herts Local Housing Needs Assessment Update Final Report March 2024 identifies a need for 802 affordable dwellings per annum. This would total 14,035 affordable dwellings across the 17.5 year plan period (October 2024 to March 2041).
- 2.2.3 In order to meet the full identified affordable housing need, the Council would need to provide a total of 35,087 dwellings within the plan period. Even then, this assumes no sites under 10 dwellings come forward without any provision, therefore in reality the figure would be higher still.
- 2.2.4 The Council's recent record of delivering affordable housing is poor. The table below sets out the affordable housing provision in recent years, as set out within the Authority's Monitoring Report 2024.

Year	Affordable Housing Completions
2023/24	129
2022/23	68
2021/22	71
2020/21	169
2019/20	31

- 2.2.5 The recent provision of affordable housing alone provides strong justification for utilising a higher housing need number, thus creating more affordable housing. This is supported by Paragraph 024 (Ref: ID: 2a-024-20190220) of the 'Housing and Economic Needs Assessment' section of the Planning Practice Guidance, which states the following:

*'An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes'*

- 2.2.6 Within the Sustainability Appraisal of the St Albans Local Plan September 2024 (LPCD 03.01), the potential to 'uplift' is discarded given it is considered 'very complex' and there are concerns from the Council that a higher growth scenario could risk market failure to deliver the homes needed. Given the level of demand and the future upward trajectory of demand as set out in the standard methodology, it is not considered likely that additional uplift beyond 14,603 dwellings would cause a potential market failure.
- 2.2.7 The reasoning for the inability to meet affordable housing need should be provided by the Council.

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