



St Albans City & District Council Local Plan Examination – Matter 2

Land at London Road, St Albans

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Prepared for:
Catesby Estates

Prepared by:
Paul Derry

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Prepared by:



Signature

Paul Derry

Printed Name

Reviewed by:



Signature

Gareth Wilson

Printed Name

Approved by:



Signature

Gareth Wilson

Printed Name



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1 Introduction

- 1.1.1 This statement has been prepared by Stantec on behalf of Catesby Estates pursuant to Matter 2 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 2

2.1 Issue 1 – Local Housing Need

Q2: What is the minimum number of new houses needed over the whole plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the PPG?

- 2.1.1 The figure of 14,603 dwellings set out in the plan is the 'minimum using the appropriate standard methodology calculation.
- 2.1.2 It is noted that the Local Plan is to be examined against the 2023 National Planning Policy Framework. The current standard method would increase the housing need significantly (currently calculated at 1,657 dwellings per annum).
- 2.1.3 It is for this reason Catesby Estates had previously suggested the addition of an immediate review policy. This would allow the new housing need to be considered at that time, thus allowing the Council to meet clear demand. Within the Regulation 19 comments, an example of Policy 1 of the Bedford Local Plan 2030 was provided.
- 2.1.4 The Local Plan Review at Spelthorne Borough Council, currently at Examination, has an immediate review policy being considered in a current Main Modifications consultation. That proposed policy states the following:

'The Local Planning Authority will undertake a review of the Local Plan 2024-2039 immediately following the adoption of this Plan. An updated or replacement plan will be submitted for examination no later than two years from the date of adoption of this Plan. The updated or replacement Local Plan will cover all policies (save for matters of development management) but will focus on the following matters that have been specifically identified during the preparation and examination of this plan:

- Housing requirement for the whole Borough based on the most up-to-date national guidance (as at the date of submission).*
- Monitoring housing delivery including the progress and implementation of sites allocated in this plan to inform the Local Plan review.*
- Employment requirement for the whole Borough based on the most up-to-date Housing and Employment Development Needs Assessment, and addressing any resultant need to allocate employment floorspace.*
- Updating the Gypsy Traveller and Travelling Show People Needs Assessment, in light of the update to Planning Policy for Traveller Sites (2024).*
- Assessment of each policy and its conformity to the NPPF.*

The replacement plan will secure levels of growth that accord with Government policy. The review will also serve to build upon existing strong, working relationships with adjoining and nearby authorities and may result in the preparation of a joint evidence or policies based upon wider functional geographies.'

- 2.1.5 There does appear to be inconsistency in table A1.1 of the Part B - Local Plan Sites part of the plan. Regarding Broad Locations, the trajectory in Part A suggest 4,077 dwellings would be delivered. However, table A1.1 states 4,227 dwellings. This table should be corrected accordingly.



Q3: The PPG advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Do any of these circumstances apply to St Albans?

- 2.1.6 As noted within the Matter 1 Statement, the South West Herts Local Housing Needs Assessment Update Final Report March 2024 identifies a need for 802 affordable dwellings per annum, totalling 14,035 dwellings across the 17.5 year plan period.
- 2.1.7 The Local Plan seeks 14,603 dwellings, and making an assumption that 40% of all dwellings would be affordable, 5,841 dwellings could be provided. This represents only 42% of affordable housing need within the best case scenario (5,841 as a percentage of 14,603).
- 2.1.8 By way of comparison, table 10 within the St Albans City & District Authority's Monitoring Report 2024 (1 April 2023 to 21 March 2024) sets out the percentage of affordable housing provision compared to total annual provision. The table is adapted below:

Monitoring Year	Total Dwelling Completions	Affordable Housing Completions	Percentage Affordable
2023/24	438	129	29%
2022/23	401	68	17%
2021/22	314	71	23%
2020/21	516	169	33%
2019/20	437	31	7%

- 2.1.9 The monitoring report shows an average of 22% affordable housing provision compared to total dwelling completions over the last monitored 5 years. At that rate, the affordable provision in relation to the proposed 14,603 dwellings would deliver only 3,213 affordable units in the plan period. Against a need of 14,035 affordable units, this would represent delivery of only 23% of identified affordable need (3,213 as a percentage of 14,603).
- 2.1.10 In line the PPG Paragraph 024 (Ref: ID: 2a-024-20190220) of the 'Housing and Economic Needs Assessment', this lack of affordable housing provides clear justification for a higher number of proposed dwellings within the plan period.
- 2.1.11 It can be achieved by the allocation of further sites that would provide affordable dwellings, particularly those that can deliver immediately and within five years of the plan period commencing. This should allow more clarity on affordable housing delivery.
- 2.1.12 As noted in response to Issue 1 Question 2 above, the new standard method of calculation for housing need with the District would be 1,657 dwellings per annum, a significant increase on the plans current 885 dwellings per annum. Whilst it is acknowledged this Local Plan is being assessed using the previous NPPF and therefore the previous standard method of calculation, it provides a clear guide of the current level of need for housing in the District. This is considered to strengthen the justification for uplifted housing figures and the need for more sites allocated now.

2.2 Issue 2 – The Housing Requirement

Q1: What is the justification for a) the level of housing proposed in the first 5 years post adoption, and b) the significant uplift from 485 to 1,255 dwellings per annum thereafter? Are the figures justified?

- 2.2.1 The stepped trajectory is required given the Council's reliance upon larger Broad Locations to meet their housing needs within the plan period. The step proposed between 2030/31 and 2031/32 is from 485 dwellings per annum to 1,255 dwellings per annum. This step represents



a 159% increase in dwellings per annum within an underperforming authority. The step is considered unrealistic, especially given the recent total dwelling completions as set out in the table above.

- 2.2.2 There is no objection in-principle to use of a stepped trajectory in appropriate circumstances. However, the size of the step in this instance is of significant concern. The Council is reliant upon housing provision moving from 316 dwellings to be provided within 2028/29 to 1,053 dwellings just two years later. To achieve this step, all sites, be them the Broad Locations, small/medium sites or small sites cannot afford any delay to the proposed trajectories. It is considered unlikely that no delay would result. The Council appears to be setting itself a target it will immediately struggle achieve as the required delivery rates rise.
- 2.2.3 Catesby Estates therefore object to the step in this instance. However, should the stepped approach remain and to reduce this clear risk to the Council, it is considered appropriate to include additional smaller site that can commence immediately in order to ensure short-term provision.
- 2.2.4 The site at London Road, St Albans is a good example of a scheme that can bring forward approximately 300 dwellings and is in single ownership and immediately available.
- 2.2.5 A further risk for the Council moving forwards is the total proposed supply within the proposed Local Plan is 14,989 dwellings. Whilst this is above the minimum figure of 14,603 dwellings, it will not cover any significant delay to any of the Broad Locations coming forward.
- 2.2.6 I also refer the Inspector back to the Regulation 19 representations submitted by Catesby Estates (then L&Q Estates), which has highlighted key deliverability concerns to a number of the sites allocated within the draft Local Plan. Should these sites not come forward, the Council will have a significant under delivery of sites and will be at clear risk of not being able to demonstrate a five year housing land supply early in the plan period.

Q2: In response to the Inspectors' Initial Questions, the Council suggests that policy SP3 should be modified to include a stepped requirement. Is this necessary for soundness, and if so, what should the housing requirement be?

- 2.2.7 It is agreed the stepped trajectory should be referenced in the wording of the policy. At present, it is misleading as it only references 885 dwellings and does not refer to this as an average.
- 2.2.8 The only reference to the stepped trajectory sits within Table 3.2 of the draft Local Plan. This should also be expanded to include the proposed delivery rates of the Broad Locations, which are currently combined. This data is available within the Housing Land Supply Windfall and Capacity Evidence Paper – Housing Trajectory Addendum November 2024 (HOU 01.01), but should be more transparent. Of note, this information was not openly available at Regulation 19 stage.

2.3 Issue 4 – Distribution of Housing Growth

Q2: What is the justification for referring to sites over 250 dwellings as 'broad locations' when they are identified in part B of the Plan? Is this approach sufficiently clear to users of the Plan and is it effective?

- 2.3.1 Whilst not considered a matter that would impact soundness of the Plan, there is a clear disconnect between labelling within Part A and B of the Plan. A consistent approach should be taken throughout. It is suggested reference to Broad Locations is removed, and each site is referenced within Part A.

Q.3: How does the distribution of sites by size reflect the settlement hierarchy? For example, are all the 'broad locations' within Tiers 1-3?



- 2.3.2 To clarify, Broad Location B3 is located in Redbourn, a Tier 4 settlement, and B8 is located adjacent to Radlett, which sits in the third tier of settlements within the Hertsmere Borough Council 2013. The Council should consider alternative Broad Locations within the Tier 1-3 settlements, such as that at London Road, St Albans, which is in a more sustainable location given existing public transport options.

2.4 Issue 5 – Site Selection Methodology

Q3: What was the justification for using distances when determining accessibility? How were other factors taken not account such as the ability to access services and facilities by walking, cycling and public transport

- 2.4.1 Using distances is a restrictive method when considered singularly. Weighting should be given to those factors set out in the Inspectors question above. For example, a site on a regular bus route, with existing cycling infrastructure available may be a more sustainable location than those set closer to the town but without such facilities. Distance itself does not create sustainability.
- 2.4.2 The London Road site for example is located adjacent to a bus stop that provides a very regular service into St Albans. It is also located on an existing cycle route into the City Centre, allowing good connectivity to the railway station.

Q8: Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

- 2.4.3 Within their Regulation 19 consultation response (para 9.14), Catesby Estates (then L&Q Estates) set out a table of concerns relating to sites that form emerging allocations. Some comments within the table relate to delivery rates. However, the majority highlight material concerns regarding a number of the sites that are proposed.
- 2.4.4 It is unclear how these concerns would impact the allocations, whether they would preclude the opportunity for sites to gain planning permission, or whether they would impact upon capacity or deliverability. Either way, a number of the sites remain and the Regulation 19 comments have not been taken into consideration given the approval by Members of the draft Local Plan prior to the comments being received by the Council.
- 2.4.5 St Albans is the largest settlement within the District. It has excellent connections and public transport services. It should be the main area for growth within the Local Plan. However, only two of the Broad Locations (site B5 is separated from the main settlement by a large trading estate and forms a spur into the countryside) and none of the Large Sites are set directly adjacent the settlement. This is a missed opportunity to make sustainable growth around St Albans a key vision for the Local Plan.
- 2.4.6 Concerns regarding Green Belt methodology are set out within the Matter 3 Hearing Statement.

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