

RESPONSE TO INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS (MIQS)

ST ALBANS DISTRICT AND CITY COUNCIL – LOCAL PLAN EXAMINATION:

MATTER 02 – HOUSING GROWTH AND THE SPATIAL STRATEGY

MATTER 03 – THE GREEN BELT

REF: **DHA/Q26954** DATE: **September 2025**

CLIENT:
CALA Homes (North Home Counties)

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Hearing Statement has been prepared by DHA Planning on behalf of CALA Homes (North Home Counties) (hereafter 'CALA Homes') in response to the Inspector's Matters, Issues and Questions (MIQs) ahead of the Stage 2 Hearing Sessions of the St Albans City and District Council (hereafter 'SADC') Local Plan Examination.
- 1.1.2 The purpose of this Statement is to assist the Inspector in the context of the questions outlined in Matters '02' and '03', with a specific emphasis on questions relating to the distribution of housing across the District and in particular those areas that are deemed to have high sustainability.

2.1 MATTER 02 – HOUSING GROWTH AND THE SPATIAL STRATEGY

Issue 1 – Housing Requirement

Question 1 How should the minimum housing requirement be reflected in the Plan to address these soundness matters? Is there a need for the housing requirement to feature in Policies SP1 and SP3?

- 2.1.1 CALA Homes agree that the annual housing requirement should be applied across the Plan period (i.e., April 2024 – March 2041). It is further highlighted that it is necessary for SADC to recalibrate the stepped housing requirement to provide an accurate forward trajectory for housing delivery and supply in the District during the Plan period.
- 2.1.2 We note that the Inspector has requested that SADC provide a new housing requirement figure and trajectory to replace that shown at Table 3.2 of the Local

Plan. We are disappointed and concerned that this is not currently available on the Council's Examination library and do not believe that the examination should proceed until this very basic requirement is provided.

- 2.1.3 When considering SADC's current housing trajectory it is abundantly clear that the Council do not have enough deliverable sites, which renders the proposed housing strategy entirely undeliverable. The Council have set out a reliance on the 'Hemel Garden Communities' to deliver consistent and high housing numbers throughout the Plan (i.e., through to 2040 / 2041), with SADC setting out that a total of 275no. new homes will be delivered in Years 4 and 5 (i.e., 100no. and 175no. respectively). This over reliance on Garden Communities, particularly towards the back-end of the Plan, shows a significant lack of sufficient deliverable sites in the early stages of the Plan (i.e., Years 1 – 3), which could have been remedied by the inclusion of more appropriate small and medium sized sites.
- 2.1.4 Indeed, had more appropriate small and medium sized sites been included as part of the Plan, then there may not have been a requirement for a stepped trajectory, or at minimum such a drastic step change as is proposed. The lack of sufficient deliverable sites has arisen as a result of SADC's methodology for sifting sites being inherently flawed (i.e., removing sub sites within larger sub-areas, despite having not review the performance of each specific site).
- 2.1.5 CALA Homes' site at 'Land off Tippendell Lane' (HELAA Reference: STS-20-21 and LPSS 02.11 Reference: C-200) is a good example of a medium-sized Site that can come forward early in the Plan-period (i.e., as soon as Year 3) with delivery in Years 4 and 5.
- 2.1.6 This Site was discounted in the HELAA as a result of being assessed against a larger sub area (i.e., SA-107) under SADC's Stage 2 Green Belt Review, rather than just the Site itself. However, when considering the Site under LPSS 02.11 ('Green Belt Buffer Sites Not Recommended to Progress Part 2 Proformas'), it is clear that the Site performs strongly against the assessment criteria of 'Major Policy and Environmental Constraints', 'Accessibility', and 'Other Key Constraints' which indicates a Site scoring highly. Indeed, the only weak scorings are against the Site's distance from a mainline railway station, its Agricultural Land Classification and location within a Source Protection Zone. Had smaller sites been considered independently from larger sub areas (e.g. SA-107), more suitable and deliverable sites could have been included within the Council's housing trajectory.
- 2.1.7 In considering the above position, CALA Homes affirm that the trajectory should not be as low as is proposed (particularly in Years 1 – 5) and the only reason for this being so low is that the site sifting methodology is inherently flawed, as set out above.
- 2.1.8 The provision of new homes within SADC is a deep-rooted, persistent, and acute issue that the Authority have not historically delivered on (with completions averaging 396no. average homes per annum between 1994 / 95 and 2023 / 24). In this context, it is noted that SADC, through this Plan, are seeking to provide 885no. homes per annum (in line with the previous Standard Method due to the Plan being submitted against a previous iteration of the Framework), which stands as significantly fewer homes per annum (i.e., against a 1,660no. requirement or

53%) than the current required need in an area that chronically and continuously fails to deliver new homes. The result of this is that from 1st July 2026 (December 2024 NPPF, Paragraph 78), a 20% buffer must be added to the housing requirement where a Plan (examined against a previous version of the Framework) as this is less than 80% of the most up-to-date housing figure.

- 2.1.9 The above stands at complete odds with the National message (which is based on the provision of housing delivery now) on the provision of housing and the Government's push to deliver 1.5 million homes within this parliamentary period (i.e., rather than potentially providing this in the future).
- 2.1.10 In considering this, SADC should not be as over-reliant on Green Belt garden communities – which can take decades to deliver – (and their reliance on neighbouring LPAs) when smaller sites are readily available and capable of delivering high levels of affordable housing (i.e., 50% on Grey Belt sites). The proposed garden communities are required to deliver high housing numbers, early in the Plan-period, consistently throughout the Plan. Indeed, these communities are additionally subject to large infrastructure requirements (such as improvements to J8 of the M1, expansion to Hemel Hempstead station, and numerous educational facilities). Given the historic and persistent under-delivery of housing, it is unacceptable that the Council appears not to be taking advantage of appropriate opportunities for early housing delivery within the first 5 years of the Plan simply because of a flawed methodology.
- 2.1.11 In considering this, SADC as an Authority with a prolonged and chronic lack of housing delivery (as recognised within the Council's Authority Monitoring Report 2024), appears content to opt to wait until Year 4 of this Plan to even reach the lower stepped requirement. The Council's proposed housing trajectory is sporadic, very volatile, and varies wildly with limited alignment with the stepped housing requirement, which is entirely inadequate. SADC can therefore not be certain that this Plan will deliver an appropriate 5 Year Housing Land Supply, which is a significant concern given that National Policy reflects the importance of a reliable supply of deliverable housing sites. It is therefore a fact that the Council's supply figure needs to be rationalised, as in their current position, the Council would effectively have a significant housing shortfall after only one year of the Plan being in place. Small and medium sized sites such as the one identified at Land off Tippendell Lane could have been given full consideration by the SADC and could have assisted in effectively 'plugging the gap' in early Plan-period housing delivery.
- 2.1.12 This lack of certainty and reliable housing land supply would not go to the heart of a Plan-led system as highlighted by the NPPF; SADC therefore must either adjust the housing requirement or housing trajectory. The current housing trajectory demonstrates that SADC believe that within a year the construction of homes within the District could move from 485no. homes to 1255no. (i.e., 2.6x) which notwithstanding historic delivery, is entirely unfeasible in market terms as the industry is simply not capable of this overnight change. CALA Homes would affirm that if SADC are capable of this sudden 'flick of a switch' increase in housing delivery then why has this not been followed previously and why are the Authority waiting so long to implement this.

- 2.1.13 In light of this context, we would implore the Council to re-visit its site selection methodology to include a greater quantum of reliable committed development sources within areas in close proximity to public transport connections and by including suitable sites such as CALA's Site Land off Tippendell Lane to fully reflect its excellent sustainable credentials and provide a pragmatic and reliable supply of deliverable small and medium sites capable of deliver early in the Plan period and to appropriately support the wider strategic ambitions of the Plan.
- 2.1.14 Notwithstanding the above position, CALA Homes recognises the importance of the Plan reflecting the strategic housing requirement within its strategic policies. However, in the interests of clarity and to remove unnecessary duplication of Policy detail it is highlighted that the strategic housing requirement only needs to be reflected within either Policy SP1 or SP3. CALA Homes would therefore affirm that Strategic Policy SP1 'A Spatial Strategy for St Albans District' would comprise a logical location for the Plan to reflect the required strategic housing requirements.

3.1 MATTER 03 – THE GREEN BELT

Issue 1 – Green Belt Review

Question 1 With reference to paragraph 146a of the Framework, has the Council adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land?

- 3.1.1 CALA Homes agree with SADC that the Council has an insufficient supply of Previously Developed Land sites to meet the Council's housing needs in full. This in turn has ultimately led to the requirement for identifying sites on Green Belt land as set out in the Council's 'Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations' Paper (LPSS.01.01). In the first instance, CALA Homes' agree with the Council that there are clearly insufficient brownfield sites to meet the Council's housing needs in full and therefore the release of Green Belt land is inevitable.
- 3.1.2 In this sense, CALA Homes note that the Council's 'Green Belt Previously Developed Land (PDL) – Additional Clarification' document (SADC/ED78) sets out how the Council has undertaken the overall Site selection process which included Green Belt PDL sites. It is clear that the Council's growth strategy is heavily reliant on Green Belt land as urban sites simply cannot deliver the required level of growth. For this reason, it is essential to ensure that all Green Belt sites have been properly assessed in addition to the Council making appropriate use of the best sites that are available to them within the District.
- 3.1.3 It is also clear that no other neighbouring Local Planning Authority is readily able to assist the Council in meeting its required need within their respective administrative areas. It is therefore imperative that those sites which were unnecessarily rejected having been assessed under larger sub-areas are now properly considered.

Question 2 Does the additional evidence adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously-developed and/or is well-served by public transport?

- 3.1.4 When following NPPF Paragraph 147, it is clear that Local Planning Authorities must take a hierarchical approach when reviewing Green Belt boundaries. In the first instance, SADC have concluded that it is necessary to release Green Belt land for development, however, the Council has failed to give full consideration to land that is well-served by public transport.
- 3.1.5 As highlighted above, the Council's methodology for site selection is inherently flawed and it is therefore evident that the Site at Tippendell Lane, will not be the only site to have been missed (as a result of being assessed under larger sub-groups) and as a result these sites would have not been fully assessed in terms of public transport accessibility (with this Site performing 'strongly' against distance to nearest bus stop and branch line railway station). In this regard, it is clear that not all appropriate and available sites have been included and the Council have not exhausted all available options prior to leaning on garden communities.

Question 3 Does the evidence demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries?

- 3.1.6 It is affirmed by CALA Homes that as part of the plan-making process, SADC have fully evidenced and justified that at a strategic level, there are exceptional circumstances to alter Green Belt boundaries. Notwithstanding this, CALA Homes firmly consider that the Council could deliver more homes than the minimum required (early on in the Plan period).
- 3.1.7 CALA Homes agree with SADC's 'Green Belt and Exceptional Circumstances – Evidence Paper' which sets out the Council's conclusions on reaching exceptional circumstances to release Green Belt land. In particular CALA Homes note the Council's dire and sustained under-delivery of new homes in addition to the lack of available non-Green Belt land in the District. The importance of this is underpinned by the requirement for SADC to demonstrate an effective 6 Year Housing Land Supply from 1st July 2026 due to the Plan providing for less than 80% of the most up-to-date housing figure.
- 3.1.8 SADC have not gone far enough in terms of increasing the supply of small and medium-sized sites to assist in addressing the Authority's chronic housing shortfall (particularly in the early years of the Plan).

4.1 SUMMARY

- 4.1.1 This Hearing Statement has been prepared on behalf of our client CALA Homes (North Home Counties) in response to the Inspector's Matters, Issues and Questions ahead of the Stage 2 Hearing Sessions of the St Albans City and District Council Local Plan Examination.

- 4.1.2 We trust that our responses are clear and will assist the Inspector in the forthcoming examination Stage 2 Hearings of the St Albans City and District Local Plan. However, CALA Homes (North Home Counties) wish to participate at the Examination owing to concerns with respect to the Council's housing trajectory and flawed site selection methodology, and the failure to maximise those sites in close proximity to public transport connections, which in our view, fails to reflect the requirements of NPPF Paragraph 147.
- 4.1.3 In this regard, it is highlighted that a series of sites have been discounted erroneously as part of the Green Belt Stage 2 assessment which saw the grouping of smaller sites into larger assessment areas. By virtue of the size of some of these sub groups, those sites included within them would inherently perform better against the purposes of the Green Belt than that of specific site assessments.
- 4.1.4 CALA Homes agree that SADC's current housing trajectory is entirely inappropriate. The proposed low level of delivery in the early years of the Plan-period is entirely inappropriate when considering National policy, the persistent historic under-delivery and the significant need for market and affordable housing. We have demonstrated above that this has resulted from a flawed site selection methodology. A better methodology would have assisted the early delivery of homes, which would ultimately reduce the Council's heavy reliance on garden communities.