

September 2025

Stage 2 Hearing Statements – Matter 1

St Albans City & District Local Plan

On behalf of Lands Improvement Holdings & Lawes
Agricultural Trust

Contents

- Matter 1 – Legal Compliance
- Matter 2 – Housing Growth and the Spatial Strategy
- Matter 3 – The Green Belt
- Matter 6 – Hemel Garden Communities
- Matter 7 – Residential Site Allocations

Stage 2 Hearings – St Albans City & District Local Plan

Weeks 2 and 3 MIQ Response on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT').

- 1.1 Submissions are made in respect of:
 - Matter 1 – Legal Compliance
 - Matter 2 – Housing Growth and the Spatial Strategy
 - Matter 3 – The Green Belt
 - Matter 6 – Hemel Garden Communities ('HGC')
 - Matter 7 – Residential Site Allocations (St Albans sites & Urban Car Parks and Garage Sites)
- 1.2 Overview

This response to the Stage 2 Examination, Week 2 and 3 Matters, Issues and questions (MIQ's) has been prepared by Urbanissta Ltd on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT') in relation to the Land at North East Redbourn ('Site').
- 1.3 Assistance has also been provided by Town Legal (TL) in preparing these representations.
- 1.4 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.
- 1.5 These MIQ submissions, supplement update and in some instances rely upon the material prepared and submitted at Regulation 18 and 19 stages of the draft Local Plan, as well as building upon MIQ submissions (oral and written) made for Matters 1 – 3 of the Examination before, during and after the Stage 1 hearing sessions. Submissions have also been made regarding the duty to cooperate (11th June 2025) and the St Albans City and District Council (StADC) Technical Consultation of August 2025. Collectively, these submissions in combination, are referred to in this MIQ Submission, as the (LIH/LAT Submissions)¹.
- 1.6 North East Redbourn is an omission site. A PPA has been agreed with StADC and an outline planning application is targeted for submission in January 2026. It is in a sustainable location, it is grey belt, capable of meeting the Golden Rules as defined by the NPPF (2024). It has been accepted as such, by StADC in a pre-application response dated 23rd May 2025.

"it is considered that the site would be likely to constitute grey belt as defined in the NPPF, and may be capable of meeting the Golden Rules requirements..... the planning policy context has changed significantly since our previous discussions and there is greater potential than was previously the case for the proposal to be considered acceptable in principle."
- 1.7 The Site is not in the National Landscape (NL), or in the setting of the NL. It is located on an eastward facing slope facing away from the NL and is over 2.5km from the NL boundary. Visibility testing has confirmed that the Site and proposed development would not be visible from the NL and therefore would not affect the setting of the NL. North East Redbourn lies toward the edge of the 12.6km Ashridge Commons and Woods buffer and will provide its own SANG as mitigation for any potential impacts arising.

¹ 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 in paragraph 1.6 p8 and the 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
- LIH Submission to the St Albans Technical Consultation - 18th August 2025 FINAL DRAFT

Stage 2 MIQ's

Lands Improvement Holdings & Lawes Agricultural
Trust

Matter 1

Legal Compliance

Matter 1 – Legal Compliance

WEEK 2

Hearing Day 4:

Tuesday 14 October 2025

Morning Session – 10:00 – 13:00

Afternoon Session – 14:00 – 17:30

Matters 1, 2 3.

Submission Deadline – 26th September

Attendance

Issue 1 – Sustainability Appraisal

- 1.8 *In response to the Stage 1 hearing sessions, the Council produced new information which has been subject to public consultation (Examination Documents SADC/ED76-SADC/ED81B). Amongst other things, that information included 'suggested' changes to the Plan. Changes include both the addition of new sites and the deletion/modification of existing ones.*

M111Q1 Has the Council updated the SA to reflect the suggested changes? Does the SA assess the proposed changes and compare these against all reasonable alternatives?

- 1.9 No, the Sustainability Appraisal (SA) has not been updated, and it should be updated comprehensively to assess any potential revisions to site allocations against all reasonable alternatives. It is not evident that this has taken place.

Issue 2– Strategic Flood Risk Assessment

2. *At the Stage 1 hearings, the Council committed to providing further clarity regarding site allocations and flooding. The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) reassesses sites subject to flooding. In summary, it proposes the deletion and/or modification of 9 allocated sites.*

M112Q1 How does the additional evidence consider surface water flood risks?

- 1.10 The LIH/LAT submissions¹ to the Local Plan Technical Consultation details that the Flood Risk Addendum (SADC/ED77) and the amendment of the capacity of several urban capacity sites, demonstrates a lack of comprehensive constraint assessment of sites included within the Council's land supply to date. The amendment of the site's capacity undermines the potential reliability of wider assumptions made on a range of sites identified within the Plan's land supply and Trajectory as highlighted in the LIH Identified Sites Deliverability Assessment (September 2023).

M112Q2 Are the suggested changes necessary to make the submitted Plan sound?

- 1.11 The proposed changes are insufficient, and additional sites are required for the housing requirement (of 885 dwellings per annum during the plan period to 2041), to be achieved. Site capacity on other larger site allocations has been highlighted as being questionable in the LIH/LAT Submissions¹ and as detailed in MIQ's for matters 6 and 7.

M112Q3 Subject to the suggested changes, is the Plan consistent with national planning policy insofar as flood risk avoidance and mitigation is concerned?

- 1.12 No, as per M112Q2 above.

Issue 3– Public Sector Equality Duty

- 1.13 3. *Policy SP4 'Housing' sets out that to provide good quality housing that meets the needs of all parts of society, the Council seeks to address the needs of 'Gypsies, Travellers and Travelling Show People'. The Plan's approach is informed principally by the 2024 Gypsy and Traveller Accommodation Assessment ('GTAA'), along with the Evidence Paper and Evidence Paper Addendum.*
4. *At the Stage 1 hearing sessions, the Council explained that it has undertaken further work following the Evidence Paper Addendum to assess the delivery potential of pitches and plots. The updated evidence was published in Examination Document SADC/ED79 and made available for consultation. It describes a potential capacity for 162 pitches against a need figure of 95 pitches to 2041.*

M113Q1 Is the minimum requirement figure based on a robust, objectively assessed analysis of needs over the plan period? Is the Plan effective in identifying the pitch requirement and stating how those needs will be met?

- 1.14 No comment.

M113Q2 What process did the Council follow in seeking to meet the identified needs referred to above? How were potential sites identified and was this process robust?

- 1.15 No comment.

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