

September 2025

Stage 2 Hearing Statements – Matter 2

St Albans City & District Local Plan

On behalf of Lands Improvement Holdings & Lawes
Agricultural Trust

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- Matter 1 – Legal Compliance
- Matter 2 – Housing Growth and the Spatial Strategy
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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)
- Overview
- 1.2 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 2

Housing Growth & the Spatial Strategy

Matter 2 – Housing Growth and the Spatial Strategy

Issue 1– Housing Requirement

- 1.8 5. *Following discussions at the Stage 1 hearing sessions, the Council accepted that the annual housing requirement should be applied across the full plan period from April 2024 to March 2041. It was also accepted that a recalibration of the stepped housing requirement was needed to reflect the most up-to-date position on predicted housing delivery and the forward trajectory.*

M2I1Q1 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?

- 1.9 Yes, it should be updated and accurately reflected in Policy as well as the new Trajectory to be produced. The housing requirement of 885 dwellings should be reflected across all years of the Plan and not stepped in the current proposed ad hoc and unjustified manner. We consider that the housing requirement should be featured in Policies SP1 and SP3.
- 1.10 If a stepped Trajectory is required, it should be ambitious and demonstrate a progressive move towards achieving the 885 dwelling per annum requirement. Paragraph 12 of the PPG states clearly that a stepped trajectory should not be a means to “*delay meeting identified development needs*”. The approach currently proposed to be taken in the draft Local Plan is plainly seeking to achieve precisely that objective.
- 1.11 The LIH/LAT Submissions¹ show that in moving from the Regulation 18 to 19 versions of the Local Plan, the Stepped Trajectory was reduced by 42% (from 710 to 485 dwellings per annum) for years 1 – 5 following the Local Plan’s adoption. Why the Local Plan strategy has been revised to be based solely on a roll forward in effect, of existing completion rates for the first 5 years, is unclear and unjustified, it does little if anything to seek to address housing need or requirements. If a stepped trajectory is justified, it should be of a more ambitious nature which could be achieved through the allocation of additional sites.
- 1.12 The very significant step change anticipated from years 5 to 6, increasing from 485 dwellings to 1,255 per annum dwellings is also unclear and unjustified in the Local Plan/Trajectory. In addition, and as set out in previous LIH/LAT Submissions¹, no or no sufficient regard has been had to the Council’s stated intention ‘*to immediately commence a review on day one following the Plan’s adoption*’ (as required by paragraph 236 of the NPPF (2024)) when the housing requirement would then need to be circa 1,660 dwellings per annum². This need for an immediate review should be addressed and robustly provided for on the face of the draft plan (whether in draft Policies SP1 and SP3 or elsewhere in the draft Local Plan).
- 1.13 Moreover, and critically no or no sufficient evidence has been provided by the Council to substantiate the suggested threefold increase in proposed supply from year 5 to year 6.
- 1.14 StADC appears to be limiting it’s 5-year land supply as far as possible from the point of adoption. Meeting the requirement of 885 dwellings over 5 years would involve 4,425 dwellings to be capable of delivery, based upon a stepped trajectory of some 485 dwellings this would represent just 2,425 dwellings, just 54% of the 5-year requirement. If assessed against the NPPF (2024), this represents just 29% of 8,300 dwellings.
- 1.15 For the next 6-7 years, the current level of housing provided is in effect to defer housing delivery as far as possible. This does little to address meeting unmet needs; mitigate affordability issues; and/or enable a transition to an ‘immediate review’ new Local Plan process following adoption of this Plan as the Council indicated they intend to undertake and are required to do in any event pursuant to paragraph 236 of the NPPF (2024). This is not what is intended by the PPG stepped housing requirement guidance and it does not represent sustainable development.
- 1.16 *To assist with the examination hearing sessions, it would be useful for the Council to produce a new housing requirement figure and trajectory to replace Table 3.2.*
- 1.17 We agree. At the time of drafting these MIQ’s, we note that no updated Trajectory is available or has been provided by the Council. We therefore reserve the right to comment further on this matter as and when the updated trajectory has been received.

Issue 2– Site Selection Methodology

- 1.18 6. *Natural England has confirmed that it is no longer pursuing an extension to the Chilterns National Landscape (formerly referred to as the AONB). The potential extension of the AONB had previously*

² NPPF 2024 standard method for StADC

informed the Council's decision not to allocate certain sites for development. Through Examination Document SADC/ED80B it is now suggested that the sites should form part of the Local Plan to ensure that it is justified and sound.

M2I2Q1 Why is it necessary for soundness to include allocations M14, M24 and M26 in the Plan? How would their allocation address specific soundness matters?

- 1.19 The LIH/LAT Submissions¹ in particular, at Regulation 18 in the submitted '*Identified Sites Deliverability Assessment (September 2023)*' make substantial comments on the potential suitability and deliverability of these sites, suggesting that M14 and M24 did not have any potential residential capacity. It was considered that site M26 had the potential for 7 dwellings.

- 1.20 For Site M14, the identified issues included:

- Site access is limited without third party land.
- The Deerings PROW might constrain the potential accessibility provisions.
- Sustainability in accessibility to service and facilities is questionable.
- Insufficient space to provide open space and dwelling requirements.

- 1.21 For Site M24 the identified issues including:

- The Area TPO as detailed above.
- Priority Habitat Woodland.
- Visibility to access poor.

M2I2Q2 How have the site boundaries been established and are they justified and effective? Do any require alterations to the Green Belt boundary, and if so, what are the exceptional circumstances for doing so?

- 1.22 It is noted that examination document ED80B proposes more of the site to be allocated, albeit it is unclear to us what the relationship is, if any, of this proposed change to the technical evidence base, such as (for example) the Green Belt Review (2023) (GBR 2023) and/or the Sustainability Appraisal (SA) and whether the same have been reviewed and updated to reflect this potential amendment. In the event, examination document ED80B does not fully consider or assess these implications and/or the deliverability of the site, and these matters have also not been addressed in the Sustainability Appraisal and/or considered against other reasonable alternatives.

M2I2Q3 If the sites are necessary, are they justified, effective and consistent with national planning policy?

- 1.23 No, as detailed in our response to M2I2Q2 above, they have not been adequately assessed as part of the Plans evidence base. It is incumbent upon the Council to carry out this necessary assessment work.

M2I2Q4 Are the additional sites developable within the Plan period?

- 1.24 More sites are needed to enable StADC to meet their housing requirement especially in the first 5-year period. Large Sites such as North East Redbourn can and would make a swift and substantive contribution to StADC's beleaguered land supply position and support ambitious but pragmatic increases in the Trajectory for the first 5 years period of the plan (and beyond), not least should other large, proposed allocated sites do not deliver on time.

- 1.25 With respect to the North East Redbourn site, as mentioned above, it is a grey belt site capable of meeting the Golden Rules under the NPPF (2024) and has been accepted as such by the Council in its pre-application response dated 23/05/2025. LIH's planning application is currently being actively prepared and the target submission date in accordance with the agreed Planning Performance Agreement (PPA) for the Site is January 2026.

M2I2Q5 What the consequences for allocating the sites on housing land supply, and conversely, the deletion and/or modification of sites subject to flooding?

- 1.26 The LIH/LAT Submissions¹ have highlighted the inconsistent approach to constraint application and interpretation and identified the need for additional sites such as the North East Redbourn site, to be allocated to address the Plan's multiple shortcomings.

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