

September 2025

Stage 2 Hearing Statements – Matter 7

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 7

Residential Allocations

Matter 7 – Residential Site Allocations

WEEK 3

Hearing Day 10: Thursday 23 October 2025

Morning Session – 09:30 – 13:00

1) Matter 7 – Residential Site Allocations

Issues: St Albans Site Allocations

Afternoon Session – 14:00 – 17:30

2) Matter 7 – Residential Site Allocations

Issues: St Albans Site Allocations continued...

DEADLINE 26TH September 2025

Written Representations

Issue 1 – St Albans Site Allocations

M7I1Q1 Based on the discussions at the Stage 1 hearing sessions (where it was agreed that the 'Broad Locations' are specific site allocations), is Policy LG1 necessary, justified and effective?

- 1.8 Policy LG1 should be amended to reflect the requirement for individual site allocations to be effective.

M7I1Q2 Where necessary, do the relevant site allocations include a requirement to provide and/or contribute towards new infrastructure for health care and education?

- 1.9 No comment.

Policy B1 – North St Albans

M7I1Q1 What is the site boundary based on and is it justified and effective?

- 1.10 No comment.

M7I1Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.11 The LIH/LAT Submissions¹, particularly in the Identified Sites Deliverability Assessment² set out several technical considerations relating to site B1, including the potential need for a secondary access point; walking distances to key amenities; and mitigation for Ancient Woodland and railway noise implications on site capacity.

M7I1Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.12 This site was assessed as making a strong contribution to the Green Belt and was not recommended in the GBR 2023, for further consideration. It is therefore unclear to us how this matter has been addressed in the site selection process.

M7I1Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner?

- 1.13 No comment.

M7I1Q5 How have flood risk and ecology been taken in account as part of the site's allocation?

- 1.14 No comment.

M7I1Q6 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 1.15 No comment.

M7I1Q7 Is Policy B1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.16 Site B1's vehicular access requires the redevelopment of the rugby pitches used by the Old Albanian Sports Association. These pitches are to be re-provided and completed before access road works can be commenced³. This will have delivery implication for the project plan, given the timescale for the require works,

² Paragraph 3.3 – 3.16 Identified Sites Deliverability Assessment - FINAL Compressed Version - 25th Sept 23

³ <https://woollampark.co.uk/faq/>

seeding and during establishment etc. As such the Policy and Trajectory at Table 3.2 of the Local Plan needs to have regards to such fundamental considerations in relation to delivery assumptions.

Policy B4 – East St Albans

M7I1Q1 What is the site boundary based on and is it justified and effective?

- 1.17 The LIH/LAT Submissions¹ particularly in the Identified Sites Deliverability Assessment⁴ set out several technical considerations for site B4 including matters of access constraints affecting deliverability/capacity; arboricultural/TPO constraints, lack of regard to landscape impacts, all of which will limit and constrain anticipated site capacity.

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.18 The proposed allocation falls within Green Belt parcels SA-24 and SA-27 of the GBR (2023). They are all assessed as making a strong contribution to the purposes of the Green Belt but are partly recommended for further consideration.

M7I1Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.19 Site B4 has capacity constraints so in our view it is questionable whether exceptional circumstances exist for amending the Green Belt boundary in this location.

M7I1Q4 How have the risks from flooding been considered as part of the site's allocation, having particular regard to surface water flooding?

- 1.20 It is unclear to us how such matters have been assessed in determining the site B4's capacity and deliverability.

M7I1Q5 Is Policy B4 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.21 No, site capacity and delivery capacity require detailed review and revision. Additional allocated sites are needed in the Plan if it is demonstrated site B4 is not able to deliver as anticipated.

Policy B5 – Glinwell, Hatfield Road

M7I1Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.22 The LIH/LAT Submissions¹ particularly, in the Identified Sites Deliverability Assessment⁵, set out several technical considerations for the site B5 including TPO's, flood risk, heritage constraints, ability to secure vacant possession and existing land use operations, render the sites ability to deliver in whole or part, questionable.

M7I1Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.23 Site B5 has capacity and deliverability constraints so it is questionable in our view whether exceptional circumstances exist for amending the Green Belt boundary in this location.

M7I1Q3 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 1.24 The LIH/LAT Submissions¹ particularly, in the Identified Sites Deliverability Assessment⁶ indicated that the site B5 does not have sustainable or suitable cycle or walking links.

M7I1Q4 Is any development proposed in areas at risk from flooding? If so, what is the justification for this?

- 1.25 It is unclear to us how such matters have been assessed in determining the site B5's capacity and deliverability, given part of the site is in flood zone 3.

⁴ Paragraphs 3.17 – 3.33 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

⁵ Paragraphs 3.72 – 3.86 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment 25th Sept 23

⁶ Paragraphs 3.77 – 3.80 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

M7I1Q5 Is Policy B4 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.26 No, site capacity and delivery require detailed review and revision. Additional sites /such as North East Redbourn, should be allocated, in case site B5, is unable to deliver as anticipated.

Policy M3 – Bedmond Lane

M7I1Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.27 The LIH/LAT Submissions¹ particularly, in the Identified Sites Deliverability Assessment⁷ identified the existence of a range of deliverability constraints, including:
- A high-pressure gas main which may sterilize (all or part of) the site;
 - The lack of sustainable connections for walking;
 - TPO's; and
 - Verulam Scheduled Ancient Monument

- 1.28 All such factors potentially significantly constrain site M3's ability to deliver new housing.

- 1.29 LIH/LAT Submissions¹ paragraph 5.62 of the Identified Sites Deliverability Assessment¹⁸ indicates that the proposed allocation falls within Green Belt parcels SA-55. Despite SA-55 being assessed as making a strong contribution to the purposes of the Green Belt, for reasons unclear, it is recommended in the Review for further consideration.

- 1.30 Site M3 is affected by a high-pressure gas main, TPO, the impact of Verulam Scheduled Ancient Monument does not seem to have been assessed in capacity terms, or the site's own infrastructure requirements.

M7I1Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.31 Site M3 has capacity and deliverability constraints so it is questionable whether exceptional circumstances exist.

M7I1Q3 How has the scale and quantum of development been determined, having particular regard to archaeological and ecological constraints?

- 1.32 See comments at M7I1Q1M3.

M7I1Q4 Is Policy M3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.33 No, the site's capacity and delivery assumptions require detailed review and revision. Additional sites such as North East Redbourn should be allocated in case site M3, is unable to deliver as anticipated.

Policy M8 – Verulam Golf Club

M7I1Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.34 No comment.

M7I1Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.35 No comment.

M7I1Q3 Is Policy M8 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.36 No comment.

Policy M18 North East of Austen Way

⁷ Paragraphs 5.53 – 5.67 - LIH Regulation 18 Submission Identified Sites Deliverability Assessment 25th Sept 23

M7I1Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

1.37 No comment.

M7I1Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

1.38 No comment.

M7I1Q3 How has the effect of development on the setting of designated heritage assets been considered, having particular regard to the Grade II listed buildings at Kay Walk? boundary at Sutton Road and Pickford Road (UC6)? Can the site be developed in the manner envisaged?

1.39 No comment.

Matter 7 – Residential Site Allocations

WEEK 3

Hearing Day 5: Wednesday 15 October 2025

Afternoon Session – 14:00 – 17:30

2) Matter 7 – Residential Site Allocations

Issues: Urban Car Parks and Garage Sites

Deadline 26th September 2025

Written Representations

Issue 11 – Urban Car Parks and Garage Sites

16. *The following car parks and garage sites are allocated in Part B of the Local Plan:*

- UC1 (Sainsbury's Supermarket, St Albans)
- UC2 (Civic Close Car Park, St Albans)
- UC3 (London Road Car Park, St Albans),
- UC4 (Car Park Rear of Upper Marlborough Road, St Albans)
- UC5 (18-20 Catherine Street, St Albans)
- UC9 (Keyfield Terrace Car Park, St Albans)
- UC14 (Waitrose Car Park)
- UC15 (Bowers Way East Car Park)
- UC22 (Car Park rear of Hatfield Road, St Albans)
- UC48 (Car Park adjacent to Adelaide Street, St Albans)
- UC50 (Southview Carpark, Lower Luton Road)
- UC54 (Harpenden Railway Car Park)
- UC10 (Garages rear of Hughenden Road, St Albans)
- UC12 (Garages between Hughenden Road and The Ridgeway, St Albans)
- UC16 (Garages west of Thirlestane, St Albans)
- UC17 (Garages off Cotlandswick, London Colney)
- UC18 (Garages to front of Riverside Road, St Albans)
- UC21 (Garages off Chapel Place, St Albans)
- UC23 (Garages adjacent to Verulam Road, St Albans)
- UC26 (Garages at Malvern Close, St Albans)
- UC29 (Garages off Noke Shot, Harpenden)
- UC30 (Garages between Abbots Avenue West and Abbey Line, St Albans)
- UC31 (Garages Rear of Tudor Road, St Albans)
- UC32 (Garages off Creighton Avenue, St Albans)
- UC33 (Land Rear of Snatchup, Redbourn)
- UC34 (Garages Rear of Hill End Lane, St Albans)
- UC40 (Land rear of New House Park Shops, St Albans)
- UC41 (Garages at Grindcobbe, St Albans)
- UC42 (Garages off Thirlmere Drive, St Albans)
- UC44 (Garages off Millford Hill)
- UC45 (Garages off Watling View, St Albans)
- UC49 (Garages rear of Furse Avenue, St Albans)
- UC51 (Garages south of Abbots Park, St Albans)
- UC52 (Garages off Tallents Crescent)
- UC56 (Garages rear of Portman House, St Albans)

*M7I11Q1 What is the justification for allocating existing car parks and garages which remain in use?
Are the sites available for development?*

- 1.40 The LIH/LAT Submissions¹ particularly, in the Identified Sites Deliverability Assessment⁸ having assessed all sites listed within the Sites within the USC category show that a significant proportion of the identified sites have questionable ability to deliver at the level or scale of housing anticipated, at least until adequate deliverability, viability and policy compliance testing has been undertaken and demonstrated.
- 1.41 The key constraints identified include:
- Deliverability constraints.

⁸ Paragraphs 8.1 - 8.50 LIH Regulation 18 Submission Identified Sites Deliverability Assessment 25th Sept 23

- Reduction in car parks capacity increasing parking pressures.
- Garage Courts impacts leading to densification concerns.
- Ownership uncertainties.
- Viability.
- Infrastructure contributions concerns.
- Inability to meet design policy objective on matter such as amenity or mix etc.
- Poor active travel environments.
- Vehicular access constraints.
- Parking provision issues.

M7I11Q2 What is the justification for requiring surveys of car park usage before proceeding with development proposals as set out in Part B of the Plan? Has any evidence been provided at this stage to determine usage and consider the consequences of redevelopment on the availability of parking, highway safety, the living conditions of local residents and impacts on local businesses?

1.42 No such evidence has been provided by the Council on these matters as at the time of responding to these MIQ's.

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