

St Albans Council
Draft Local Plan Examination
Stage 2 Hearings

Hearing Statement
Matter 2 – Housing Growth and Spatial Strategy

Ref: ELP/HS2/M2

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Personal Statement and Declaration

I have a BA (Hons) in Geography and an MSc in Urban and Rural Planning and I am a Chartered Member of the Royal Town Planning Institute.

All the information and evidence in this Statement have been prepared by me and are given in accordance with the guidance of the RTPI and I confirm that the views expressed are my genuine professional opinions.

For the sake of transparency, I declare, first, that my wife is a Council Officer and, secondly, that I represent a number of clients with sites in the District, including Moor Mill Tanker Depot, a PDL Green Belt site.

Brian Parker, September 2025



Issue 2 – The Housing Requirement

1. The Section begins (my underlining):

“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.

*Q1 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?*

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.”

2. The following is submitted in the absence of an updated Trajectory.
3. Please refer to my submission in response to the Council document “Green Belt Previously Developed Land (PDL) – Additional Clarification” (SADC/ED78), i.e. Representation Ref: 380 Smug Oak Lane Limited. The Council’s clarification of its approach to PDL sites in the Green Belt, helps explain why the first ‘step’ in the trajectory is so low.
4. It is clear that many brownfield sites, such as Moor Mill Tanker Depot, could have been allocated to deliver housing in the first few years of the Plan Period if the Council had not eliminated them from the Site Selection Process for the wrong reasons.
5. **The stepped Housing Trajectory cannot be considered Justified until a proper re-assessment of all PDL sites in the Green Belt has been carried out in accordance with the Government’s policy of “brownfield first”.**

Brian Parker
BA MSc MRTPI
September 2025