

ST ALBANS LOCAL PLAN EXAMINATION IN PUBLIC

STAGE 2 HEARINGS

Response to Matter 2: Housing Growth and the Spatial Strategy

Written Statement on behalf of Catesby Estates

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LDA Design has previously submitted hearing statements on behalf of Catesby Estates in relation to land south of St Albans, known as land at Windridge Farm, and attended the Stage 1 hearing sessions in relation to matters of Legal Compliance, Housing Growth and the Spatial Strategy and the Green Belt. We have previously prepared and submitted representations in response to the Regulation 18 and Regulation 19 consultations on the Local Plan.

This statement builds on points made in our hearing statement (Hearing Statement 193) submitted in relation to Stage 1, Matter 2 – Housing Growth and the Spatial Strategy and taking into account the discussions held during the Stage 1 Hearing Session on Wednesday 30 April 2025 in relation to the same Matter.

Since the Stage 1 hearings St Albans City and District Council has prepared and submitted additional evidence to the examination and this statement makes reference to this additional information.

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?

Housing Requirement

During the Stage 1 Hearings, there was a lengthy discussion about the appropriateness of the proposed plan period which started in the middle of an annual monitoring period, which in this case is October 2024. The discussions resulted in the suggestion that the Council reviews the start date of the plan and amends the housing requirement and housing trajectory accordingly to avoid confusion and ease the process for future monitoring and future decision making. We look forward to having the chance to review the Council's amended housing requirement that is applied across a revised plan period of April 2024 to March 2041, and an updated trajectory, in advance of the Stage 2 hearings.

In the absence of the recalibrated housing requirement and housing trajectory being published, we would like to take the opportunity to comment on what in our view the housing requirement should be and the options the Council should explore to avoid such a substantial step up in housing delivery within years 6-10 of the plan period.

The result of amending the start of the plan period to April 2024 would effectively increase the annual housing requirement by 442 dwellings to account for the additional 6 months period resulting in an overall requirement for the plan to deliver a minimum of 15,045 net additional homes from 1 April 2024 to 31 March 2041. This should be reflected in SP1 and SP3 of the Plan.

The Council has not yet confirmed an updated housing requirement or identified how the additional homes needed within the revised plan period will be delivered. In line with the Council's spatial strategy, we propose that sites within or adjacent to Tier 1 settlements, that have been considered in full as part of the Council's site selection process should be reconsidered to meet these additional needs. Land at Windridge Farm is located at St Albans, a Tier 1 settlement, the site was given the same recommendation in the Green Belt Review 2023 as the proposed Broad Locations, it scored comparably in the site selection

proformas and is in a sustainable location adjacent to a proposed bus and cycle corridor along the A414. Allocating Phase 1 of Windridge Farm as a broad location would be consistent with Council's spatial strategy as well as paragraph 74 of the NPPF which outlines that "the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)".

Housing Trajectory

The Council's Stage 1 Hearing Statement which responds to 'Matter 2 – The Housing Requirement' outlines that the stepped approach is taken to align with the relatively low level of housing land supply in the period 2026/7 to 2030/31, sourcing supply primarily from existing permissions. During the Stage 1 hearing sessions, the Council expressed the view that they could meet additional housing need by revisiting the 'step-up' through a review of existing permissions and allocations to uplift numbers where possible. We do not feel that this would achieve a significantly reduced 'step-up' in the housing requirement without the allocation of new sites.

The Council should not be relying primarily on existing planning permissions in the first 5 years of the plan, especially where these may have obstacles to delivery, and should be allocating small to medium sites that are deliverable within the first 5 years of the plan period to increase the supply of land and meet local housing needs. Currently small and medium sites (5-99 homes) only account for 7.9% of the overall number of houses being delivered through new allocations within the Plan and large sites (100-249 homes) account for only 3.6% of the supply. This approach is not consistent with that set out within paragraph 69 of the National Planning Policy Framework (December 2023) which states that "*planning policies should identify a sufficient supply and mix of sites*". The Council should seek to identify additional small, medium and large sized sites to increase the delivery of homes within the first 5 years of the plan period and reduce a reliance on the relatively few 8 no. Broad Locations and Hemel Garden Communities to deliver the majority (78.9%) of local housing needs.

Additional small and medium sites can be identified via several methods, with the NPPF providing appropriate guidance. Paragraph 70 of the Framework explains that small and medium sized sites make an important contribution to meeting the housing requirements of an area and are often built out more quickly. The Framework sets out several ways that local planning authorities can promote the development of a good mix of sites, and criteria e) outlines that Councils can "*work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes*".

There is insufficient evidence to demonstrate that the Council has proactively engaged with developers, who are promoting available and deliverable sites through the local plan process, to identify sites that could be sub-divided to deliver homes earlier in the plan period. We would argue that this lack of evidence demonstrates that the plan has not been positively prepared and that the Spatial Strategy should be reviewed to further support local housing needs.

The methodology within the Lichfields 'Start to Finish (third edition)' 2024 report is referenced in the Council's hearing statement for Stage 1, Matter 2, Issue 2 as informing the Council's approach to build out rates. However, the report identifies a median delivery timescale for sites between 100-499 dwellings as 5.2 years with a lower quartile figure of 2.6 years. This provides evidence that the Council has taken a somewhat cautious approach to delivery rates by assuming that all the broad locations will take a minimum of 5 years to deliver the first homes, and that the housing trajectory lacks an ambitious approach to meeting the district housing needs. The timescales set out in the Lichfield report indicates that there is a significant reduction in lead in times for sites between 50-99 dwellings (median 2.7 years) and 500-999 dwellings (median 4 years), meaning that the Council should be allocating an increase in small or medium sites to address uncertainty around the delivery of larger allocations.

The later plan period delivery timescales for allocations within the plan demonstrates the need for the identification of additional less-constrained small, medium and large sites required to meet the additional housing need resulting from the enlarged plan period, as well as the in-built low delivery of the early years. This can be achieved by revisiting the site selection process and the sub-division of larger sites and should be conducted by the Council in an attempt to meet the annual housing requirement of 885 dwellings in full within the first 5 years of the Plan.

If a stepped housing trajectory remains the preferred approach the Council should seek to 'step up' delivery across the first 5 years of the plan period, instead of in year 6-10. This should be achieved through an increase in completions that are delivered on a mix of sites that does not put such a significant reliance on Broad Locations to deliver in years 6-10. The Council should be mindful of the requirements of paragraph 16 of the NPPF that plans should be prepared positively, in a way that is aspirational but deliverable. The Council should be the driver for an increase in house building by constructively engaging with developers early on in plan making to try and reduce delivery timescales for larger sites that can often provide the most economic, environmental and social benefits. The first phase of Land at Windridge Farm could help to increase the delivery of homes by some 450 in the first 5 years of the plan as the site is available, achievable, and deliverable and can provide the economic, social and environmental benefits that the district needs in a sustainable location.