

ST ALBANS LOCAL PLAN EXAMINATION IN PUBLIC STAGE 1 HEARINGS

Response to Matter 2: Housing Growth and Spatial Strategy

Written Statement on behalf of Catesby Estates

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Comment

This document has been prepared and checked in accordance with ISO 9001:2015.

1.0 Issue 1 – Local Housing Need

Q1 What is the plan period for the submitted St Albans Local Plan? Is this sufficiently clear to users of the Plan?

There appears to be some discrepancy between the plan period referenced in the Sustainability Appraisal (LPCD 03.01) compared to the plan period then cited in the Local Plan submission document.

The Sustainability Appraisal (LPCD 03.01) at para 2.2.15 in discussing local housing need, refers to a 15 year plan period. Section 2.4 of the SA then states:

“The new Local Plan is likely to be adopted in 2025/26, and must “look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure...” As such, the plan period runs to 2041.”

However, later in the SA (para 5.2.9) the plan period is referred to as 16.5 years, and this figure is what provides the Plan’s overall housing requirement of 14,603 homes (885 dpa over 16.5 years). This is reflected in the Local Plan (LPCD 02.01), and Strategic Policy 1 discusses housing need across the Plan period and states:

Following the Government’s required ‘Standard Method’ for calculating local housing need, the Council will identify and allocate land for the delivery of at least 14,603 net additional new houses, or 885 per annum in the period 1 October 2024 - 31 March 2041.

It is unclear as to why the Plan period starts in October 2024 and there doesn’t appear to be any explanation as to why the Plan period starts halfway through 2024/25. There may be some clarification needed on the exact period used and that this then aligns with the proposed housing trajectory.

Q3. The PPG advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Circumstances may include situations where there are growth strategies for an area, where strategic infrastructure improvements are proposed or where an authority is taking on unmet housing needs from elsewhere.

Do any of these circumstances apply to St Albans?

Our response to this question should be considered in conjunction with our Hearing Statement prepared in response to Matter 1 – Legal Compliance, and particularly in relation to our response to Issue 1 – Duty to Cooperate and Issue 3 – Sustainability Appraisal. There are several reasons, which we have set out below, which should be considered when determining if actual housing need in St Albans is higher than the standard method figure proposed to be met.

Firstly, there is clear evidence that there are likely to be unmet housing needs arising across the South West Herts area, for example as a result of Three Rivers Borough Council and Hertsmere Borough Council planning to not meeting their housing needs in full (according to the Standard Method). This indicates that there are circumstances in St Albans where actual housing need is higher than the standard method and that this has not been taken into account.

In addition to the issue of unmet housing need, there is a significant need for affordable homes within the St Albans District. The South West Hertfordshire Local Housing Needs Assessment (LHNA) 2024 calculates that there is a need for 802 affordable dpa within St Albans, which is equal to 90% of the total proposed housing requirement to be met in the Local Plan. This significant affordable need could be addressed by setting a housing requirement above the standard method.

Finally, the new Standard Method of calculating housing needs was published with the new National Planning Policy Framework (NPPF) in December 2024, and while it is acknowledged that this plan is not being examined against the current version of the NPPF, it should be noted that the new housing need for St Albans has increased significantly, increasing from 885 dpa to 1,660 dpa, an increase of 75%. This is largely due to the weight that is attributed to the affordability adjustment in the Standard Method calculation. This suggests that the actual housing need, including taking account of significant affordable housing need, in St Albans is significantly higher than the 2023 Standard Method figure used to set the requirements within this Plan and it demonstrates that circumstances exist that would make it appropriate to deviate from the standard method.

2.0 Issue 2 – The Housing Requirement

In response to the Inspectors' Initial Questions, the Council states that a stepped housing requirement is justified to allow sufficient time for the significant uplift in housing delivery to be realistically delivered. The stepped requirement is proposed as 485 dwellings per annum for the first 5 years post adoption of the Plan, rising to 1,255 dwellings per annum in years 6-10.

Q1 What is the justification for a) the level of housing proposed in the first 5 years post adoption, and b) the significant uplift from 485 to 1,255 dwellings per annum thereafter? Are the figures justified?

We do not consider the low level of housing delivery in the first five years of the Plan to be justified. Delivery in the first five years of the Plan is proposed to be 2,491 homes, which is a little over half over the 4,425 homes required by the Standard Method over the same period, which is a significant shortfall post immediate adoption of the Plan. The Council should be seeking to allocate additional green belt land to support the delivery of new homes on a range of additional sites that are available and deliverable earlier in the plan period to ensure that the significant stepped change is not required and there is greater delivery of homes early on to meet the immediate needs. The previous Local Plan was adopted in 1994. It is therefore of the upmost importance that the authority do all in their power to meet the current housing need (noting the affordability ratio is 16.1). The allocation of additional sites at the beginning of the plan period can and should be done to bring forward much needed homes.

Furthermore, within the Housing Trajectory in the Local Plan (Table 3.2) it is unclear which of the Broad Locations, Large Sites, Medium and Small Sites and Sites Within the Urban Settlements (UCS) the Council expects to come forward to deliver the step change in annual housing requirement in years 6-10 of the plan period. Historically, the District has fallen well short of delivering its housing requirements and previous Annual Monitoring Reports have shown that the average annual completions over the period 1994/1995 to 2021/2022 has been 395 homes, hitting a peak of 624 homes in 2018/2019. The most recent Annual Monitoring Report 2024¹, published on 8 March 2025, shows that over the past 5 years an average of 421 homes were completed, which falls short even of the proposed 485 homes per annum requirement in the first 5 years of the Plan.

Setting out which allocations are expected to deliver the stepped change in years 6-10 within Part B – Site Allocations of the Plan would provide a greater degree of confidence that the stepped trajectory can be achieved.

¹ [SADCED71 AMR Authority's Monitoring Report 2024.pdf](#)

3.0 Issue 4 – Distribution of Housing Growth

Q1 How does the distribution of housing growth compare with the settlement hierarchy over the plan period, taking into account completions, commitments and sites identified in the Local Plan? Does the spatial strategy reflect the size, role and function of settlements in Policy SP1?

The Council confirms in paras 9.3 – 9.5 of its response to the Inspectors Initial Questions (SADC/ED32) that new development will generally be concentrated on the basis of the Settlement Hierarchy, and there will be a close relationship between the spatial distribution of site allocations and larger settlements.

In outlining the settlement hierarchy, Policy SP1 states:

The City of St Albans will continue to be the pre-eminent focus in the District for housing, employment, services, retail, the evening economy, education and healthcare.

The Settlement Hierarchy (Table 1.3) provides the basis for allocation and location of growth, locating most growth generally within and adjacent to the larger and most sustainable urban centres that are Tier 1 - St Albans and Hemel Hempstead; Tier 2 – Harpenden, and Tier 3 - London Colney.

However, considering the principle position of St Albans in the settlement hierarchy it is therefore notable that as a location it only contributes three sites (total 1,749 homes) to be released from the adjacent Green Belt. This amounts to only 41% of the capacity of the ‘broad locations’ (defined as 250+ homes), and only 16% of the total local plan housing allocations. The proposed allocations really only comprise two relatively modest urban extensions at North and East St Albans, and we suggest this is not reflective of, or proportionate with St Albans’ position in the settlement hierarchy. Nor does it create sufficient opportunities for people to take advantage of the social, economic and community infrastructure provided by the City, as identified in the Council’s own assessment, that appears in para 6.2 of the draft Local Plan.

In the submitted draft Local Plan, the Council has a series of policies aimed at enhancing the role of St Albans as a key, sustainable destination. We suggest that the identification of only two sites of any significance to provide new housing at St Albans will serve to undermine the achievement of this objective by limiting the potential market for local services and facilities especially when it is acknowledged that there is ‘some leakage of expenditure to other centres outside the District’ (para 6.2). The Sustainability Appraisal (page 136) also acknowledged that planning for ‘higher growth at St Albans could unlock or facilitate the delivery of strategic transport infrastructure upgrades’ and there is a recognition that supporting strategic growth locations in the areas where housing is needed, such as St Albans City, would provide the opportunities to develop more ‘walkable neighbourhoods’ in any event.

We therefore do not consider that the spatial strategy fully reflects the settlement hierarchy identified and that it would be appropriate as part of the strategy and distribution of growth, to allocate more green belt land adjacent to St Albans to deliver housing, in accordance with a more sustainable approach to develop.

4.0 Issue 5 – Site Selection Methodology

The Methodology Paper highlights that some sites that were not recommended for further consideration by the Green Belt Stage 2 assessment were still recommended to progress by the proformas. Reasons included their location next to a Tier 1 or Tier 2 settlement and potential to deliver sustainable development.

Q7 Following the completion of the proformas, how did the Council decide which sites to allocate?

We consider that there is insufficient justification contained within the ‘Green Belt Sites Not Recommended to Progress’ Proformas as to why sites were not recommended for further consideration. The Qualitative Assessment that draws together the results of the Green Belt Review Stage 2 Report and the Major Policy and Environmental Constraints outlines the sustainability credentials of each; however it is not explicit as to the criteria that were applied in deciding on a site not being recommended to progress. The approach to site selection in this regard is therefore not fully justified or evidenced.

Q8 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

We consider, for reasons set out in our Regulation 19 representation (Rep ID ref. 193-1), that the Major Policy and Environmental Considerations set out within Table 2 of the Site Selection Methodology Paper² have not been applied consistently across the site selection process and in some instances are contrary to policy contained within the draft Local Plan. We set out previously that conclusions reached in respect of some sites performance against these considerations does not appear to be correct or justified.

² [LPSS 02.02 - Local Plan Site Selection Proforma Methodology Paper \(2024\).pdf](#)