

# ST ALBANS LOCAL PLAN HEARING STATEMENT

## MATTER 2 – HOUSING GROWTH AND SPATIAL STRATEGY

### STONEBOND PROPERTIES

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#### Issue 1 - Local Housing Need

*To determine the minimum number of homes needed, paragraph 61 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in the PPG, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. The PPG advises that the standard method provides local planning authorities with an annual housing need figure which can be applied to the whole plan period.*

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

The plan period is stated as covering the period from 1<sup>st</sup> October 2024 to 31<sup>st</sup> March 2041. Whilst this is over the 15-year minimum requirement, it is unclear why the base date is mid-monitoring year. It would have made more sense for the plan period to run from 1<sup>st</sup> April 2024.

**Q2 What is the minimum number of new homes needed over the whole plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the PPG?**

The minimum number of homes to be planned for under the standard method is 885 dpa. Based on the plan period stated in the submitted Local Plan, which covers 16.5 years, the minimum requirement of 14,603 dwellings is accurate.

However, paragraph 61 of the NPPF (December 2023), under which the Local Plan is being examined, sets out that this is only an advisory starting point in establishing a housing requirement for the area (see question 3 below).

*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.*

**Q3 Do any of these circumstances apply to St Albans?**

The matter of unmet need across the Housing Market Area has been an issue that has been discussed and debated for a number of years across Hertfordshire. This matter has been complicated by the requirement at paragraph 61 of the NPPF (December 2024) which now requires Local Authorities to aim to meet their identified housing needs. Whilst the St Albans Local Plan is not being examined under the revised NPPF, this requirement will impact on other Local Authorities in Hertfordshire and should lead to an increased level of land being released for development in the other Hertfordshire Authorities.

However, there is still a significant unmet need from London that is well documented and known to the Authority that should have been factored in to the housing requirement, which would have led to the need for additional housing land to be identified in the Local Plan.

Additionally, the Local Housing Need Assessment is clear that there is a significant affordable housing issue in the area. This issue is analysed from paragraph 7.120 of the Assessment (HOU 02.01) where, although it is noted there is a complicated relationship between Local Housing Need and the assessed number of affordable homes needed each year, the level of need identified is so great that it is clear that more needs to be done to maximise the delivery of affordable housing in the local area. Stonebond consider that this issue represents an exceptional circumstance for deviating from the Local Housing Need figure.

## **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?***

The only justification given for the stepped trajectory appears to be the reference at paragraph 3.27 of the Local Plan to the need for sufficient time to be allowed in order for the significant uplift in housing delivery to be realistically delivered.

Whilst Stonebond have some sympathy for this position given the lead-in times for some of the major sites which will mean delivering the full housing requirement immediately will be difficult, there is absolutely no justification for setting the housing requirement at 485 per year for the first 5-years of the plan period. This appears to be purely based on the estimated level of supply that is deliverable from identified sites, rather than any form of strategic decision.

This position is taken by Stonebond on the basis that the Authority have not maximised the allocation of small/medium sized sites across the area, which would be capable of being delivered in the first five years of the plan period, such as their sites at Notcutts Garden Centre and Gustard Wood, which are referenced elsewhere in this statement (and our Matter 3 statement) as appropriate. If such suitable sites were identified for development in the Local Plan, their delivery would be factored into the housing trajectory and the number of homes deliverable in the first five years.

In particular, we would point to the deficiencies in the approach taken with regards to the Green Belt Assessment in relation to the identification of sites for release from the Green Belt (covered under Matter 3). If this approach had been undertaken in accordance with the NPPF (December 2023, paragraph 147) other sustainable sites would have been identified for development.

The approach of the Council to effectively back load the delivery of housing merely puts off the need to deliver the level of housing that is needed in the local area. Under the transitional arrangements set out of Annex 1 of the NPPF (December 2024), the Authority will need to start planning immediately for a significantly higher annual housing figure generated by the revised Standard Method (currently 1,660 dpa). Whilst not a matter of soundness for the Local Plan at examination, for context, it means that the Local Plan is effectively looking to deliver under 30% of the housing need generated by the revised Standard Method. Given this context, it highlights the importance of maximising the level of housing that is deliverable in the first five years of the Plan period and the need to properly scrutinise the soundness of the stepped housing trajectory proposed.

***Q2 - In response to the Inspectors' Initial Questions, the Council suggests that Policy SP3 should be modified to include a stepped requirement. Is this necessary for soundness, and if so, what should the housing requirement be?***

Notwithstanding that Stonebond do not agree that the stepped trajectory suggested is sound, if the stepped trajectory is to be accepted, this has to be set out in policy and Policy SP1, rather than Policy SP3 would be the logical location for this given this covers the Spatial Strategy – which the stepped approach directly affects.

### **Q3 - Is the housing requirement intended to be found in Policy SP1 or SP3?**

It is suggested that the housing requirement should be set out in Policy SP1 as it is directly related to the Spatial Strategy. The fact that the requirement is also set out at Policy SP3 and referred to at paragraph 3.7 is characteristic of the confusing structure of the early sections of the Local Plan.

## **Issue 3 – Settlement Hierarchy**

***The St Albans City and District Council Settlement Hierarchy Study Part 1 Baseline (LPCD 13.01) maps areas of development that have taken place since the Local Plan Review 1994, but remain in the Green Belt. It confirms that (for the purpose of the assessment), the defined settlement areas should therefore remain as shown in the Local Plan Review 1994.***

### **Q1- What is the justification for this approach given the period of time which has elapsed? Does the assessment adequately reflect the form, role and function of existing settlements in the area?**

Stonebond do not consider the approach taken to defining the Settlement Hierarchy is sound. As noted in the Inspector's question, the Study uses the settlement boundaries set out in the 1994 Local Plan. This approach is taken despite the physical characteristics of settlements across the Authority having been significantly changed by development over the previous plan period. The approach also fails to revisit some of the decisions made back in 1994 that were used to draw the boundaries, to see if they remain sound. This particular decision has a greater impact on the Green Belt Assessment, which is discussed in our Matter 3 Statement, rather than the definition of the Settlement Hierarchy.

Looking specifically at the Settlement Hierarchy Study, this fails to sufficiently factor in the importance that the NPPF places on sustainability, particularly with regard to accessibility to public transport such as at paragraphs 108c, 129 and 147. As an example, Stonebond are particularly concerned about the approach to defining Smallford as a Tier 6 Green Belt Village at the bottom of the Settlement Hierarchy. This is despite the settlement effectively being joined to the urban area of St Albans by the proposed residential allocation at Glinwell and the fact that the settlement is acknowledged in LPCD 13.01 as being of elevated sustainability compared to its scale. At paragraph 6.50 of LPCD1 13.01 it is stated that:

*However, despite the small size of the settlement, it is very well connected by bus to St Albans to the north and west and to Hatfield to the east. It is also located on the Alban Way cycle route which is a disused section of the Great Northern Railway running between St Albans and Hatfield. These features make Smallford more sustainable in terms of accessibility when compared to other settlements located in the Green Belt.*

Despite this statement, it is unclear how this is factored into the role and function of the settlement, which ultimately has a knock on impact on other decisions made regarding this settlement throughout the evidence base. Stonebond believe that a sound approach to establishing the Settlement Hierarchy would have placed greater weight on the accessibility of Smallford (and potentially other settlements) to public transport, as well as the accessibility to services and job opportunities in St Albans. This is elaborated on further below under Question 2.

### **Q2 - Are the scores used in the settlement hierarchy assessment accurate and robust?**

There are a number of deficiencies in the approach of the Assessment to defining the scores given to particular settlements. Given their interests in Smallford, that settlement is used as an example.

- Cycling – The assessment offers points based simply on the number of routes that service a settlement. There is no recognition of the fact that Smallford lies on a national cycle route between two main towns. The scoring process is overly simplistic and does not benefit from appropriate weighting like some other criteria.
- Bus routes – The score is simple based on the number of routes in each area with no reference to how regular they are or where the routes serve. Therefore, there is no recognition of the strategically advantageous location of Smallford on the route between St Albans and Hatfield.
- Not all services and facilities are picked up in the assessment, e.g. there is no recognition of the services and facilities that are available in Smallford, including the convenience offer at the petrol station shop, pub and the

garden centre with the village itself as well as the day nursery and farm shop immediately adjacent to the settlement within walking distance. This approach may be in part due to the use of the 1994 settlement boundaries discussed under Question 1 above, but highlights the fact that the sustainability of a settlement should not just be defined by what services and facilities are within a defined boundary, but what are also accessible on foot in the immediate vicinity.

- Employment – there is no recognition of the employment opportunities within walking distance of settlements. In the case of Smallford, there is no recognition that there are a wide range of employment opportunities under 500m to the west which are easily available on foot to residents.

**Q3 - How have the scores and baseline evidence been used to determine which settlements fall within the proposed tiers? Is the settlement hierarchy justified, effective and sound?**

Stonebond do not have an issue with how the settlements have been defined based on the scoring of the settlements within the assessment. This logically places the higher scoring settlements at the top of the settlement hierarchy.

However, if a more robust assessment were to be undertaken which reflected the true sustainability of settlement, the scoring of settlements would be different and Smallford would likely be higher up the 'table' in terms of the score, which would lead to the identification of the settlement as a medium sized village.

Indeed, the point was made in our Regulation 19 representation that given the proposed allocations in the Local Plan, specifically the identification of Glinwell to the immediate west of Smallford, the settlement could be classed as part of the main urban area of St Albans rather than requiring separate identification.

Overall, Stonebond do not consider that the approach taken by the Authority is sound as it is not properly justified by the evidence base.

## **Issue 4 – Distribution of Housing Growth**

***Policy SP1 states that the Settlement Hierarchy provides the basis for the allocation and location of growth, locating most growth generally within and adjacent to the larger and most sustainable urban centres in Tiers 1-3 (St Albans and Hemel Hempstead, Harpenden and London Colney).***

***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?***

Stonebond are of the view that the distribution of housing growth, particularly the small sites, is driven by the identification of suitable sites through the Green Belt Assessment rather than any strategic decision to direct a particular quantum of growth to different levels of the Settlement Hierarchy.

Stonebond's concerns with the Green Belt Assessment are set out in our Matter 3 Statement. However, it is relevant to the distribution of housing that the inappropriate approach taken in the Green Belt Assessment of applying different sized buffers around settlements at different levels of the hierarchy has led to the identification (or not) of potential sites at each level of the hierarchy.

Whilst this approach means there was a greater opportunity to identify sites around higher order settlements (due to the larger buffer being applied) this is not as a result of a strategic decision to identify 'x%' of development at particular levels of the hierarchy – it is due to site availability.

## **Issue 5 – Site Selection Methodology**

***The Local Plan Site Selection – Proforma Methodology Paper (September 2024) (LPSS 02.02) describes the process used by the Council to allocate sites in the Plan. The starting point is the Housing and Economic Land***

**Availability Assessment ('HELAA'). The Methodology Paper states that out of 678 housing sites, the HELAA identified 566 sites to progress to the next stage.**

**Q1 - What were the reasons for discounting sites at the initial assessment stage? Was this done on a consistent and transparent basis?**

Stonebond are not clear from the way the evidence base has been presented how sites were removed at the initial stage. Their sites at Smallford (referred to above) and at Gustard Wood were both assessed as suitable in the HELAA but have not progressed for different reasons, related to Green Belt and National Landscape Designations (discussed further below). However, this is not made abundantly clear through the way the information has been presented whether the initial discounting of sites was transparent.

**The Methodology Paper then states that “a more spatially focussed piece of work” was carried out by applying a buffer around each settlement inset from the Green Belt to assist in “encouraging a sustainable pattern of development”.**

**Q2 - Were all sites beyond the 'buffers' discounted at this stage? Is this a justified and effective approach to site selection?**

This issue is covered in more detail in our Matter 3 Statement. However, in brief, it is clear from LPSS 02.02 paragraph 1.14 that Green Belt sites identified as suitable in the HELAA but outside the Green Belt Review buffer were not considered suitable due to their less sustainable location and because development on such sites would create holes in the Green Belt leading to fragmentation.

This approach is clearly neither justified nor effective, as it fails to ensure that the requirements of paragraph 147 of the NPPF (December 2023) are satisfied. This is not necessarily a failure of the site assessment process, but a failing of the Green Belt Assessment on which the site assessment process relies. This has failed to properly assess the sustainability of locations within the Green Belt, particularly with regard to access to public transport, which paragraph 147 specifically refers.

**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.**

**Q6 - What was the justification for this approach, and why did it differ from potentially sustainable development proposals in other Tiers of the hierarchy?**

The rationale for this approach is set out at paragraph 1.31 of LPSS 02.02 where it states:

*Some Green Belt sites that were not recommended for further consideration by the Green Belt Stage 2 were recommended to progress by the proformas due to the location of the site next to a Tier 1 or 2 settlement and the potential of the site to deliver a wide range of significant Economic, Environmental and Social benefits including housing, affordable housing, schools, and a significant scale of sustainable transport improvements and jobs.*

Given the significant need for residential development, the approach of identifying sites on the edge of the main settlements not recommended for further consideration can be justified by the fact that these are likely to be the most sustainable locations for development, with the best access to public transport (as required by NPPF (December 2023) para 147). Therefore, the need for development forces the Authority to make difficult decisions about releasing land from the Green Belt that may make more of a contribution to the purposes of the Green Belt contribution compared to other areas.

However, this reinforces the point raised elsewhere by Stonebond that before making such a decision, there is a need for a robust assessment of all Green Belt sites to identify those which perform limited Green Belt purpose whilst also meeting the requirements of paragraph 147. Sites such as Stonebond's site at Notcutts Garden Centre, which clearly

makes a limited contribution to the purposes of the Green Belt, whilst also being in a highly accessible location, should be identified ahead of those sites at Tier 1 and 2 of the Hierarchy that are less suitable in Green Belt terms.

***Q7 - Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?***

No – as already noted, the use of the defective Green Belt Assessment as part of the site selection process has led to suitable development sites being missed.

Additionally, as set out in our Regulation 19 representation of Stonebond's site at Gustard Wood, we do not consider that the approach of ruling out sites on the basis that they lie in an area of 'potential' expansion of the Chilterns National Landscape Area is an appropriate approach to take.

We have not repeated the points raised in our representation here but would point to the key issues which are:

- There is a complete lack of published information (from the Authority or otherwise) on the matter to allow a transparent assessment of sites.
- The Assessment pre-empts the outcome of a statutory process which has yet to be subject to any consultation.
- Natural England's response to the Regulation 18 consultation is clear that the assessment process does not confer any additional planning protection to area. Any impacts should be considered in an assessment of the landscape and visual impacts of the proposal on this area and should be undertaken to identify opportunities to avoid or minimise impacts on the landscape. This does not look to have happened.

Stonebond therefore consider that there are clear gaps in the Authorities evidence base which mean that the site assessment process is not robust.