

ST ALBANS LOCAL PLAN HEARING STATEMENT

STAGE 2, MATTER 2 – HOUSING GROWTH AND SPATIAL STRATEGY

STONEBOND PROPERTIES

Issue 2 – Site Selection Methodology

Natural England has confirmed that it is no longer pursuing an extension to the Chilterns National Landscape (formerly referred to as the AONB). The potential extension of the AONB had previously informed the Council's decision not to allocate certain sites for development. Through Examination Document SADC/ED80B it is now suggested that the sites should form part of the Local Plan to ensure that it is justified and sound. Q1 What is the plan period for the submitted St Albans Local Plan? Is this sufficiently clear to users of the Plan?

Q1 - Why is it necessary for soundness to include allocations M14, M24 and M26 in the Plan? How would their allocation address specific soundness matters?

Stonebond consider that the inclusion of the additional sites helps to addresses their concerns that there is insufficient deliverable housing supply identified within the Local Plan to meet the minimum housing need. Without providing comments on each of the sites in detail, given the sites were previously identified as being suitable for development at Regulation 18 stage, the proposed 're'allocation of the sites is therefore supported by Stonebond.

However, Stonebond consider that the 're'allocation of sites should be extended to include site M12 (Land off the Slype, Gustard Wood, also referred to as site WH-10-18) which was also identified as a draft allocation at Regulation 18 Stage.

Site M12 was identified for allocation at Regulation 18 stage using the same process as the three sites that are now proposed for 're'allocation. At this point, no issues with access to the site or its sustainability were identified given its location within one of the 250m buffer zones, relied upon to identify sites in accordance with paragraph 147 of the NPPF (December 2023), which we discuss further in our Matter 3 Statement.

As noted in our representation on the Additional Information consultation, the only factor that ruled the site out was the fact that the site '*met criteria for an extension to the Chilterns National Landscape*'. Despite highway issues being used to rule out other sites at the same stage prior to the Regulation 19 consultation, no reference to access or sustainability was made in the assessment of the site. This is confirmed in Table 9 of SADC/ED81A.

The Council conclusion is now (SADC/ED80A, paragraph 20) 'On the basis of a consistent and justified approach to the allocation of sites for development in sustainable locations in the district, the Council, without prejudice to any future consideration of sites in the Plan, does not consider that any changes to the draft Local Plan are justified with regard to land at site' (our emphasis underlined).

As flagged in our Additional Information consultation response, the approach now taken cannot be considered to be either 'consistent or justified'. As is touched on in our Matter 3 Statement in relation to Stonebond's other land interest at Notcutts Garden Centre, the Council have relied on buffers to identify sites in sustainable locations for development

in the Green Belt. To then rule a site out within a buffer on the basis that it is unsustainable is at odds with that approach – if the buffers cannot be relied upon to identify sustainable locations for development, it calls in to question the use of the buffer approach more generally.

The conclusions of site M12 have been based on the findings of the Transport Impact Assessment (TIA) for the site. This appears to ignore the information provided to the Council at Regulation 18 stage and again at Regulation 19 stage which set out Stonebond's position on access, sustainability and compliance with national policy, which was provided knowing this was an issue likely to be explored by the Council.

Setting this point aside, we noted in our Additional Information consultation response that sites have been taken forward in other areas despite either not being subject to a TIA or the findings not being applied consistently. This further calls into question the soundness of the approach to allocating sites.

Therefore, whilst Stonebond support the 're'alloation of the identified sites to meet the significant housing need, it is their position that to be made sound the approach of the Council to site allocations should be amended to take forward, on a consistent basis, the allocation of sites identified within the 250m/400m buffers on the basis these are considered sustainable locations for development generally. The Council should also ensure that any TIA work is applied consistently in a manner which is consistent with national policy, which recognises development in more rural areas will have less opportunities for sustainable travel.

Q2 - How have the site boundaries been established and are they justified and effective? Do any require alterations to the Green Belt boundary, and if so, what are the exceptional circumstances for doing so?

If the sites are to be allocated Stonebond consider that the sites should be removed from the Green Belt necessitating a review of the Green Belt boundary.

The exceptional circumstances for amending the Green Belt boundary were discussed at stage 1. Notwithstanding the need to demonstrate as much use of brownfield and underutilised land has been made as possible (see Matter 3 statement), we don't consider the circumstances have changed, with the lack of alternatives, the previous shortfall in housing delivery, the significant ongoing need for housing and affordability challenges providing the necessary justification.

Q3 - If the sites are necessary, are they justified, effective and consistent with national planning policy?

Stonebond consider that additional sites are necessary generally to meet the minimum housing needs of the area. The allocation of the sites identified is justified and consistent with national policy – but as noted under Q1, the sites (and others in the draft Plan) have not been assessed and identified on a consistent basis.

Q4 - Are the additional sites developable within the Plan period?

Sites of the scale proposed are considered to be developable early in the Plan period, as would site M12 be. This scale of site, deliverable in the early years of the plan period, is specifically required to meet the immediate need for housing which should not be pushed back to later in the plan period.