



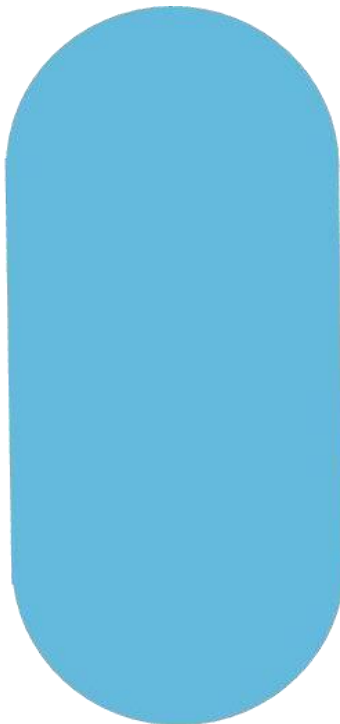
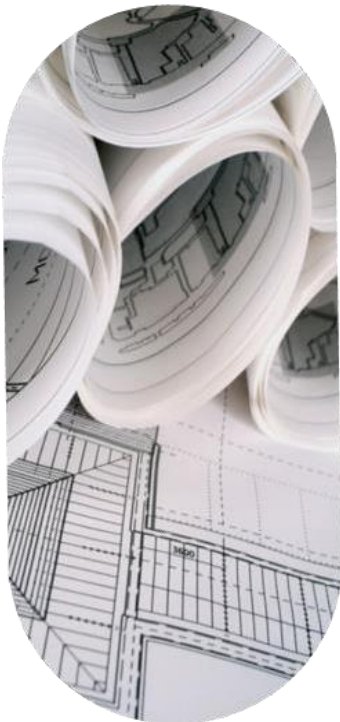
 Part of Shakespeare Martineau

St Albans Local Plan Examination

Matter 2 Hearing Statement

Prepared on behalf of
Martin Grant Homes and Kearns Land Ltd

April 2025



60 Gracechurch Street, London, EC3V 0HR
www.marrons.co.uk

Contents

1.	Introduction.....	3
2.	Issue 1 – Local Housing Need	4
3.	Issue 2 – The Housing Requirement	6
4.	Issue 3 – Settlement Hierarchy	8
5.	Issue 4 – Distribution of Housing Growth.....	9
6.	Issue 5 – Site Selection Methodology	10

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1. Introduction

- 1.1 This Matter Statement has been prepared on behalf of Martin Grant Homes and Kearns Land Ltd (the Promoters) in respect of Matter 2 relating to housing growth and the spatial strategy of St Alban District Council's (SADC) Local Plan.
- 1.2 The Promoters have interests in the District at Land to the East of Redbourn, Redbourn (the Site, HELAA reference R-18-21). The Site is identified within the Plan as part of allocation site M6. Representations have been submitted at earlier stages of Plan preparation through Regulation 18 and 19 consultations.
- 1.3 This Matter Statement responds to the Inspectors' questions and have been considered in the context of the tests of 'Soundness' as set out at Para 35 of the NPPF (December 2023¹). These require that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

¹ The Plan is submitted under the transitional arrangements of the NPPF 2024, and as such is to be considered against the NPPF 2023.

2. Issue 1 – Local Housing Need

Q.1 What is the plan period for the submitted St Albans Local Plan? Is this sufficiently clear to users of the Plan?

2.1 The Plan period runs until 2040/41 as set out at para 1.1 and 1.5 of the Plan, as well as referenced in the Vision and Objectives of the Plan and Strategic Policy SP1.

2.2 The base date of the Plan, as referenced in Strategic Policy SP3 and elsewhere in the Plan is identified as being 01 October 2024. The Plan therefore covers a period of 16.5 years.

2.3 This is consistent with para 22 of the NPPF which states:

Strategic policies should 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

2.4 Should adoption of the Plan not be before April 2026, it may cover a period less than 15-years. However, in accordance with para 236 of the NPPF 2024 (transitional arrangements), there is a clear expectation SADC will, post-adoption, commence work immediately on a new Plan under the revised Levelling Up and Regeneration Act plan-making system. In this context, a Plan period slightly less than 15-years is likely to be acceptable, ensuring the Plan can progress and provide a significant boost to housing land supply.

2.5 We therefore consider the Plan period to be consistent with national policy.

Q.2 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

2.6 Strategic Policy SP43 identifies a standard method figure of 885 dwellings per annum, equating to 14,603 dwellings over the 16.5-year plan period.

2.7 Planning Practice Guidance is clear that housing need figures can change, and this should be taken into consideration as part of Plan making. Where a Plan is submitted for Examination an authority can rely on the standard method calculation for a period of 2 years from the time of submission (ref. Paragraph: 008 Reference ID: 2a-008-20241212)

2.8 The identified housing need figure reflects the standard method calculation at the time of submission of the Plan on 29 November 2024.

- 2.9 Whilst the Standard Method has subsequently been updated, there is no requirement to reflect this in the current Plan. Instead, Para 236 of the NPPF 2024 is clear the difference (shortfall) will be address through subsequent plan-making.
- 2.10 The housing need figure underpinning the Plan is therefore consistent with national policy.

3. Issue 2 – The Housing Requirement

Q.1 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?

3.1 The Plan seeks to address minimum housing needs across the Plan, in accordance with the standard method requirement of 14,603 dwellings over the 16.5-year plan period. However, it includes a stepped housing trajectory “in order to allow sufficient time for the significant uplift in housing delivery to be realistically delivered” (para 3.27).

3.2 Planning Practice Guidance (Paragraph: 012 Reference ID: 68-021-20190722) makes clear instances in which a stepped trajectory may be suitable for plan-making:

A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.

3.3 The current Local Plan was adopted in 1994, covering a period up to 2001. It is therefore dated, and not reflecting modern day housing needs.

3.4 The policy vacuum resulting from this, coupled together with the prevalence of Green Belt across the District, has had a detrimental effect on housing delivery across the last 20 years. The Council’s latest Annual Monitoring Report (2022 / 23) shows on average 395 dwellings per year delivered in SADC between 1994/95 and 2022/23.

3.5 Further, without the benefit of new Plan allocations there is a significantly dwindling supply in the short and medium-term, being mostly reliant on currently unknown ‘windfall’ sites post-2026/27.

3.6 There is a clear step-change needed in delivery in order to achieve the Plan aspirations to meet minimum housing needs in full. A significant element of this will be on sites which are currently Green Belt, and therefore, in the main, are awaiting allocations to be confirmed and to be released from the Green Belt before applications come forward.

3.7 The proposed stepped trajectory reflects the level of current commitments and the expected trajectories of new Local Plan site allocations, predominately from sites within urban settlements and medium and small sites (5 – 99 homes) in the short-term.

3.8 Larger sites (100 – 249 homes) and broad locations (250+ homes) are anticipated to begin deliver later in the Plan period, beyond the first 5-years post-adoption. In line with Planning Practice Guidance, this again supports the proposed stepped trajectory.

- 3.9 Whilst Planning Practice Guidance (Paragraph: 012 Reference ID: 68-021-20190722) states that stepped trajectories should “not seek to unnecessarily delay meeting identified development need”, we consider there is clear justification in this instance for the trajectory proposed.
- 3.10 SADC has acknowledged there will need to be step-change in housing delivery to deliver housing and affordable housing needs across the Plan period. It has, alongside identification of larger sites which will deliver the medium and long-term, importantly identified a range of smaller sites (up to 100 homes) which can deliver in the first 5-years post adoption. These are necessary to assist in expediently increasing housing delivery, thereby not “unnecessarily” delaying meeting needs.

4. Issue 3 – Settlement Hierarchy

Q.3 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?

- 4.1 SADC has sought to ensure the Plan actively managed growth in a way which focuses significant development on locations which are or can be made sustainable (as per NPPF 2023 para 109).
- 4.2 The Settlement Hierarchy Study Part 1 (June 2023) informs the proposed spatial strategy by undertaking a qualitative review of settlements across the District, identifying whether any updates are needed from the 1994 Plan hierarchy.
- 4.3 The 1994 hierarchy provides an effective starting point, with some but only limited growth outside the plan-led system (mostly on account of the Green Belt restraint). However, this was based on population size rather than a detailed consideration of how settlements function.
- 4.4 The Study Part 1 'scores' the settlements on the presence or absence of specific sustainability indicators including public transport, services and facilities, employment and accessible connections to higher order settlements. This is considered a more effective and robust methodology for understanding the sustainability of settlements, than based on population size alone.
- 4.5 The outcomes of this work demonstrate there are a variety of different functions settlements perform across the District, ranging from City / Larger Town (St Albans) to Hamlets. We consider this important for clarity purposes, acknowledging the role larger settlements (i.e. Redbourn) will continue to play in meeting growth needs of the District.
- 4.6 The outcomes are clear and justified and assist in delivering an effective spatial strategy for the Plan in order to meet housing and other needs in a sustainable way.

5. Issue 4 – Distribution of Housing Growth

Q.5 How did the classification of land as Green Belt and the availability of land within the urban area determine the spatial strategy and distribution of housing growth?

- 5.1 As set out in our Matter 3 statement, SADC pursued a 'brownfield first' approach to site selection, as set out in the Local Plan Site Selection - Proforma Methodology Paper (September 2024). The outcome of SADC's 'brownfield first' approach has led to circa. 900 dwellings being proposed for allocation on urban sites within the Plan, with a further circa. 140 dwellings on previously developed land in the Green Belt.
- 5.2 SADC is tightly constrained by Green Belt with over 81% of the District comprising land in the Green Belt, effectively all the District except for the main built-up areas of the towns and larger villages. There is no reasonable scope for addressing housing needs without looking to the Green Belt.
- 5.3 SADC's approach to the Green Belt has been to balance Green Belt sensitivity with wider factors from a sustainability perspective. This aligns with the Plan Vision and Objectives, and the Sustainability Appraisal framework.
- 5.4 In light of the limited non-Green Belt opportunities which exists across the District, this has, broadly, linked the highest levels of proposed Green Belt release with the most sustainable locations across the District.
- 5.5 This approach is justified, ensuring that opportunities, of all sizes, have not be ruled out purely due to their location within the Green Belt.
- 5.6 Further, whilst the Plan will be examined under the NPPF2023, it is notable that the conclusions SADC's Green Belt Review work support most, if not all, the proposed allocations as meeting the definition of 'grey belt' as set out in the NPPF2024. This would include the Site, at Land to the East of Redbourn, which the Green Belt Review confirms performs weakly against the purposes of the Green Belt (as part of Sub-area 8) including:
- Purpose 1 – Check unrestricted sprawl of large built-up area – no contribution
 - Purpose 2 - To prevent neighbouring towns merging into one another – limited contribution
 - Purpose 4 - To preserve the setting and special character of historic towns – no contribution

6. Issue 5 – Site Selection Methodology

Q.2 The Methodology Paper then states that “a more spatially focused 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”. Were all sites beyond the ‘buffers’ discounted at this stage? Is this a justified and effective approach to site selection?

6.1 As detailed in our Matter 3 Statement, we consider the approach to “buffers” is justified, aligning with the Vision and Objectives of the Plan and the Sustainability Appraisal framework. This is consistent with national policy and is an effective approach to identifying a range of suitable and sustainable housing sites to meet needs over the plan-period.

Q.7 Following the completion of the proformas, how did the Council decide which sites to allocate?

6.2 SADC’s approach to site selection included a range of considerations including the performance of sites / areas against the purposes of the Green Belt and the sustainability of sites. This is as detailed in the Site Selection Methodology, Outcomes and Site Allocations report (September 2024).

6.3 The proforma approach assessed each site in terms of its “sustainable development potential” including considering its context to the existing settlement / neighbouring uses, the Green Belt (including outcome of the Green Belt Review Stage 2 Report, September 2024) and known constraints. This is a qualitative process and allows recommendations (i.e. progress or does not progress) to be made.

6.4 Each proforma includes a ‘scoring’ as a result of the criterion-based process (i.e. scoring for accessibility and constraints). This highlights which sites could be considered most ‘suitable’.

6.5 The outcome, i.e. progress / do not progress, is the culmination of whether the site is suitable in the round when considering all these matters together i.e. for Land to the East of Redbourn, Redbourn (HELAA reference R-18-21 / allocation M6), the proforma highlights the site is in a weakly performing Green Belt area, is subject to some constraints but none overriding, and is adjoining a Tier 4 Settlement. It is therefore recommended to progress.

6.6 We consider this is a justified approach, which, in accordance with the spatial strategy, develops a positively prepared and effective approach to meeting housing needs across the Plan period.

Q.8 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

6.7 We consider the approach is robust and has considered, suitably, the sites submitted for consideration as well as those proactively located by SADC. The criteria assessed (including Green Belt, accessibility and constraints) is extensive, and ensures a justified strategy is proposed.