# Stantec UK Limited

# **Examination of the St Albans City and District Local Plan - Stage 1 Hearing Sessions**

# **Hearing Statement - Matter 2**

Prepared on behalf of Redington Capital Ltd and CALA Homes

# **Matter 2 - Housing Growth & Spatial Strategy**

Redington Capital Limited and CALA Homes (RCLCH) set out below their responses to the questions raised by the Inspectors. The responses are set out in the order they appear in the Inspectors' MIQs. The Inspectors should assume that no comment is made by RCLCH in respect of the questions that have are not included below.

## 2.1 Issue 1 – Local Housing Need

### Question 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?

### Response:

The previous standard methodology indicates that the minimum number of homes needed in St Albans is 885 dpa, resulting in a total need of 14,603 homes over plan-period. The most up-to-date standard methodology figure is 1,660 dpa (as of 12<sup>th</sup> December 2024).

If the Draft Local Plan is deemed to be 'sound' by the Inspectors, RCLCH would expect this is on the basis that the Council agrees immediately to review its housing delivery sites position and identifies additional sites to meet the new housing target set out in the latest Standard Methodology and as required by paragraph 236 of the NPPF (December 2024).

# 2.2 Issue 2 – The Housing Requirement

### Question 1:

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.

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?

### Response:

Delivery in the first five-years of the plan is expected to be approximately 2,491 homes, compared to the 4,425 homes that are required by the previous Standard Methodology over that period.

RCLCH considers that the Council could have identified more sites in the Green Belt to increase its housing delivery within the first five-years of the housing trajectory, particularly as the Council has a history of under-delivery. The Council has been notified of sites that are available and deliverable during the first five-year period in the trajectory.

RCLCH's site (land at south of Chiswell Green Lane) benefits from an extant planning permission<sup>1</sup>. It should start delivering 100 homes per year from 2026/27. Reserved matters applications (ref: 5/2024/2239 & 5/2024/1915) for both phases were submitted to the Council in October and December 2024 and are expected to be determined later this year. Despite this, the Council has chosen a slower (from 2027/28) and lower (50 dpa) delivery rate for RCLCH's site, as set out on page 2 of the Council's AMR – Draft Local Plan Housing Trajectory – Permissions Sites Addendum – April 2025 (SADC/ED71A). This feeds directly into the information shown on Table 3.2 (Housing Trajectory) on page 26 of the Draft Local Plan (LPCD 02.01).

The Council and Inspectors have an opportunity to help address this very low delivery rate by:

- Adjusting AMR and Table 3.2 of the Draft Local Plan (as set out above) to reflect the quicker and higher delivery rate;
- Identifying other new sites through the 2<sup>nd</sup> set of Hearing Sessions to come forward as an Inspectors' recommended main modification; and /or
- The Inspectors requiring the Council to immediately review its housing delivery sites position and identifies additional sites to:
  - o Address its very low delivery rate for the first five-years of the plan; and
  - Meet the new housing target set out in the latest Standard Methodology and as required by paragraph 236 of the NPPF (December 2024).

# 2.3 Issue 3 – Settlement Hierarchy

### Question 2:

Are the scores used in the settlement hierarchy assessment accurate and robust?

### Response:

The score for the settlement of Chiswell Green are not accurate.

The Settlement Hierarchy (Part 1) (*LPCD 13.01*) places Chiswell Green as a Tier 5 (Medium Sized Village) settlement. However, the settlement hierarchy does not fully consider that Chiswell Green:

- Benefits from access to public transport and other local services and facilities that are normally associated with a Tier 1 settlement;
- Is located on the edge of St Albans City and is within 2.5 miles of its city centre and its facilities
  and services. In essence, Chiswell Green is an extension of St Albans (a Tier 1 settlement),
  similar to Batford / Southdown / West Common being an extension to Harpenden but regarded
  to be part of Harpenden for the purposes of the settlement hierarchy; and

<sup>&</sup>lt;sup>1</sup> For 391 homes (including 40% affordable), open space provision and land for a 2FE school with planning permission (ref: APP/B1930/W/22/3313110)

When comparing the land around Chiswell Green to some of the Tier 1 to 5 site allocations included in Part B (Site Allocation) of the Draft Local Plan, it is evidently more accessible with a wider range of services and facilities than some of those sites put forward for housing development in Part B of the Draft Local Plan (LPCD 02.02).

Table 6 (Settlement Hierarchy Scores) of the Settlement Hierarchy Study (Part 1) (*LPCD 13.01*) has given Chiswell Green a score of 9.3. However, this score should be much higher for the following reasons:

- The bus route score (1) on pages 46 and 47 only indicates that one bus route is accessible to Chiswell Green residents. There are in fact three bus routes (no's 321, 361 and 724) accessible to Chiswell Green;
- The train station score (0) on pages 48 and 49 does not reflect the fact that:
  - How Wood railway station and Park Street railway station are within a 10-minute walk or 2-minute cycle away [some of the Tier 3 and 4 settlements do not have access to a rail station at all – London Colney, Redbourn, Wheathampstead]; and
  - Residents have access to St Albans City station which is a 15-minute cycle ride or a 10-minute bus ride away.
- There are existing Public Rights of Way (PROW) walking routes in the vicinity of the Chiswell Green, including no's 82, 80, 21, 39 and 28;
- The supermarket score (0) on pages 50 and 51 does not reflect the fact that there is a co-op supermarket located within Chiswell Green and residents have access to supermarket facilities located on the west side of St Albans (Sainsburys and Lidl at the Abbey View Retail Park) which is a 25 minute walk or 10-minute cycle ride away or 5-minute bus ride away [this is assuming that the residents will not be ordering their shopping on-line];
- The leisure centre score (0) on page 50 does not reflect the fact that residents of Chiswell Green have access to Westminster Lodge Leisure Centre located on the west side of St Albans which is a 25 minute walk or 10-minute cycle ride away or 5-minute bus ride away. Residents also have access to Watford Leisure Centre;
- There are eight GP practices located within a 4km radius of Chiswell Green and a further two GP practices located just beyond a 4km radius, in London Colney;
- St Albans City Hospital is also located less than 4km to the north of Chiswell Green;
- There are public open spaces within proximity to Chiswell Green, including allotments, playing fields, public parks, play space and religious grounds. In terms of the public open spaces with play facilities, these include:
  - Playing fields at Cherry Hill and Mayflower Road which are within 500m;
  - o Greenwood Park allotments; and
  - Four existing play areas within 900m, one of which (Greenwood Park Play Area) has an extensive provision of play equipment for children up to the age of 14 years, with a new range of play equipment for children under 6 years installed in 2019.
- Chiswell Green benefits from access to the M25 motorway which makes it very attractive for commuters and to commercial floorspace (last mile) distribution operators.

Maps illustrating the location of Chiswell Green in comparison to the above are attached as **Appendix A**.

Notwithstanding where Chiswell Green is positioned within the settlement hierarchy, it is a location that can and should accommodate more homes and employment floorspace because of its high level of access to transport facilities and local services. Additional housing sites should not be rejected in this location because it is a lower tier settlement (with less population). The Council should be identifying land around Chiswell Green for housing and employment purpose in Part B (Site Allocations) of the Draft Local Plan. It is a highly accessible location with a wider range of services and facilities locally and benefits from access to other services located within a Tier 1 settlement.

One such site<sup>2</sup> that can come forward now is being promoted by RCLCH at land south of Chiswell Green Lane in Chiswell Green which now benefits from an extant planning permission<sup>3</sup> and is included in the 2,365 homes figure for "Permissions Estimated Future Completions" of Table 3.2 on page 26 of the Draft Local Plan (*LPCD 02.01*). However, Chiswell Green can, and should, accommodate more homes on its fringes.

RCLCH suggest that the solution to the situation is for the Inspectors to re-position Chiswell Green higher up in the settlement tiering system in the Draft Local Plan and to identify RCLCH's land around Chiswell Green Lane for housing and employment purposes. These amendments to the Draft Local Plan could be secured by way of the Inspectors' recommended modifications.

### **Question 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?

### Response:

In RCLCH's opinion, subject to the adjustments as set out in RCLCH's response to 2.3 Issue 3, question 2 (above), the settlement hierarchy can be justified and can be made effective and sound. These adjustments could be secured by way of the Inspectors' recommended modifications.

### 2.4 Issue 4 – Distribution of Growth

### Question 1:

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).

<sup>&</sup>lt;sup>2</sup> Representation reference number 224 on pages 1174 to 1238 of the 'St Albans Draft Local Plan 2041 Regulation 19 Publication by Submission Report' (LPCD 20.03).

<sup>&</sup>lt;sup>3</sup> For 391 homes (including 40% affordable), open space provision and land for a 2FE school with planning permission (ref: APP/B1930/W/22/3313110)

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?

### Response:

In RCLCH's opinion, from an existing situation perspective (assuming status quo is best) the spatial strategy does generally reflect the size, role and function of all of the settlements in Policy SP1.

From a future growth perspective and taking opportunities to better utilise infrastructure, to continue to maintain the role and function of Chiswell Green as is (status quo) is a wasted opportunity.

When considering the close proximity of Chiswell Green to How Wood and Park Street stations (via walking or cycling) and St Albans City Station (via bus or cycling), its level of bus service, its local infrastructure provision and its proximity to the M25 and the wider road network, this settlement could perform a greater future role and function in meeting the District's housing and employment floorspace needs. As such, this would mean adjusting the status quo. This adjustment, as set out in RCLCH's response to 2.3 Issue 3, question 2 (above), can help the District meet its needs and could be secured by way of the Inspectors' recommended modifications.

# 2.5 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.

### Question 2:

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".

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

### Response:

RCLCH is concerned about the approach adopted by the Council to site selection. In particular, the information used in the scores given to RCLCH's site (Ref: C-249 [HELAA Ref: STS-10-21] on the relevant Proforma Sheet (page 33, Part 2)) (*LPSS 02.11*) and the subsequent conclusion reached by the Council – 'not recommended to progress'. For example, in the document titled 'Green Belt Buffer Sites Not Recommended – Part 2' (September 2024) (*LPSS 02.11*) a large number of 'weak' scores given to RCLCH's site are unfair and unjustified, particularly when it has been demonstrated through technical evidence as part of the extant planning permission (ref: 5/2022/0927) that an acceptable scheme can be delivered on the Site. This technical evidence has demonstrated that it can be delivered:

 Without any unacceptable impact on Agricultural Land Classification (ALC); priority habitat; existing woodland; Source Protection Zones; TPOs; non-designated biodiversity; Green infrastructure corridors; access to open space; and  Resulting in the delivery of significant benefits including: access to open space and the green belt; a BNG; the provision of green corridor connections and bridleways through the Site to the wider green belt; the provision of a new school (including nursery and SEND facilities); cycle improvements to allow improved access to the nearest branch line railway station.

The extant permission was recommended for approval by the Council's officers, tested at Public Inquiry and recommended by the Planning Inspector, and allowed by the Secretary of State (SoS).

Therefore, many of the 'weak' and 'medium' scores for the Site should in fact be 'strong' scores. The Council should have adjusted these scores and the recommendation to progress with the Site for development purposes as pre-EiP modification.

Notwithstanding the above, the Council and Inspectors have an opportunity to help address this unfair and unjustified scoring by:

- Discussing the merits of RCLCH's site at the 2<sup>nd</sup> set of Hearing Sessions. RCLCH's site could come forward as an Inspectors' recommended main modification; and /or
- The Inspectors requiring the Council to immediately review its housing and employment delivery sites position and identifies additional sites to meet the new housing target set out in the latest Standard Methodology and as required by paragraph 236 of the NPPF (December 2024).

RCLCH note that other sites with planning permission have been brought forward as site allocations and the Green Belt boundary is proposed to be adjausted. RCLCH is requesting that their site at land south of Chiswell Green Lane is treated in the same way to ensure consistency within the Draft Local Plan. The abovementioned sites are set out in the Reg 19 Local Plan Part B (2024) (*LPCD 02.02*):

- North St Albans Site B1 (page 15)
- Burston Nurseries Site L1 (page 28)
- Rothamsted Lodge Site M21 (page 47)
- Orchard Drive Site M10 (page 39)

### **Question 3:**

Proformas were then used to analyse each site against a "sustainable development potential", taking into account the Green Belt Study and major policy and environmental constraints. Accessibility was determined by measuring distances to key infrastructure and services.

What was the justification for using distances when determining accessibility? How were other factors taken into account such as the ability to access services and facilities by walking, cycling and public transport?

### Response:

In RCLCH's opinion, other factors such as walking cycling and public transport have not been fully taken into account, as explained in RCLCH's response to 2.5 Issue 5, question 2, immediately above.

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### Question 6:

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.

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

### Response:

In RCLCH's opinion, additional housing and employment sites should not be automatically rejected because they are located around lower tier settlements. The Council should be identifying land around these settlements if they are accessible and in a sustainable location with access to a range of services and facilities locally and benefits from access to other services located within a Tier 1 and/or 2 settlement.

One such site is being promoted by RCLCH at land south of Chiswell Green Lane which now benefits from planning permission. Representations were submitted to the Council on 7<sup>th</sup> November and can be found under representation reference number 224 on pages 1174 to 1238 of the 'St Albans Draft Local Plan 2041 Regulation 19 Publication by Submission Report' (LPCD 20.03).

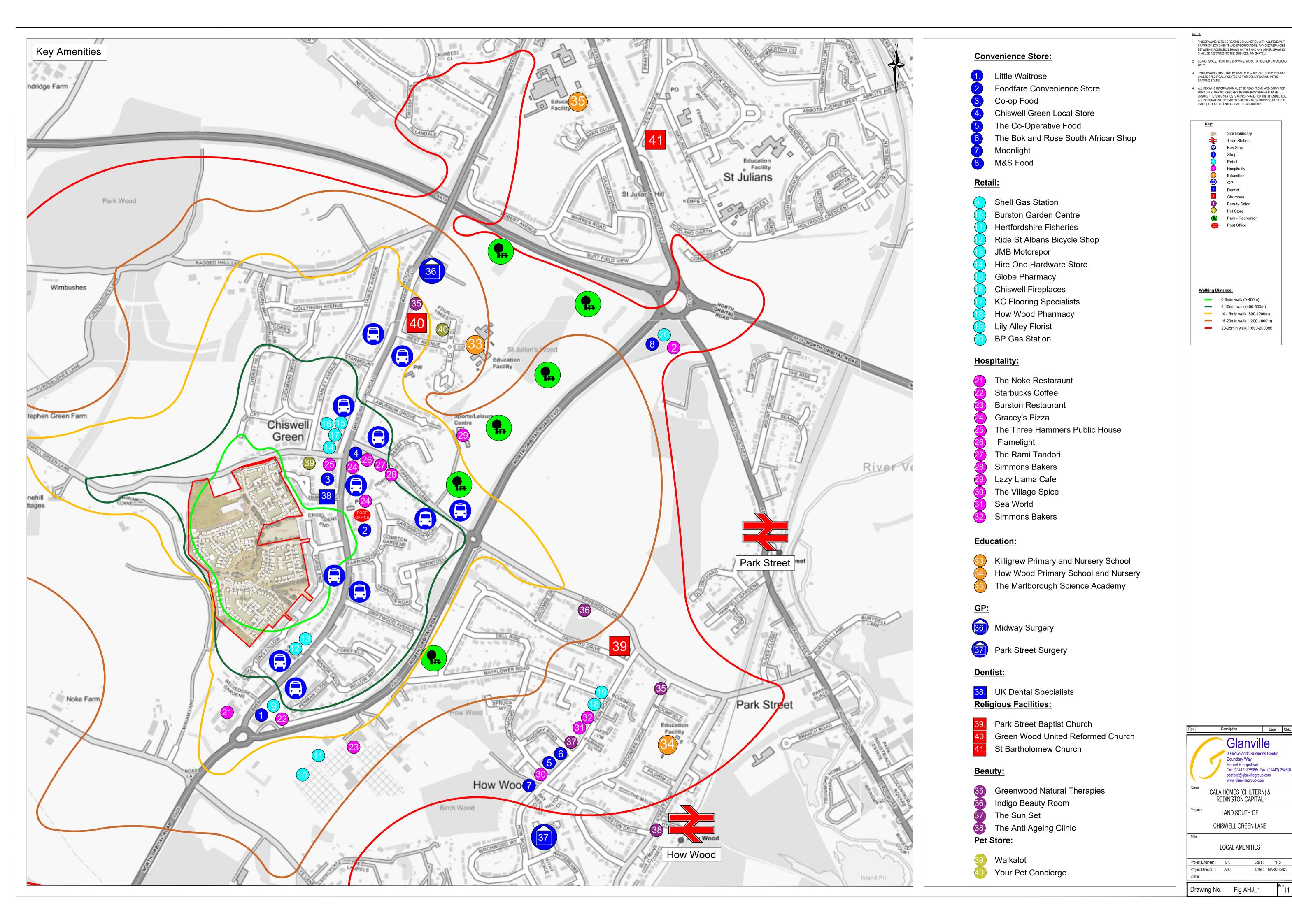
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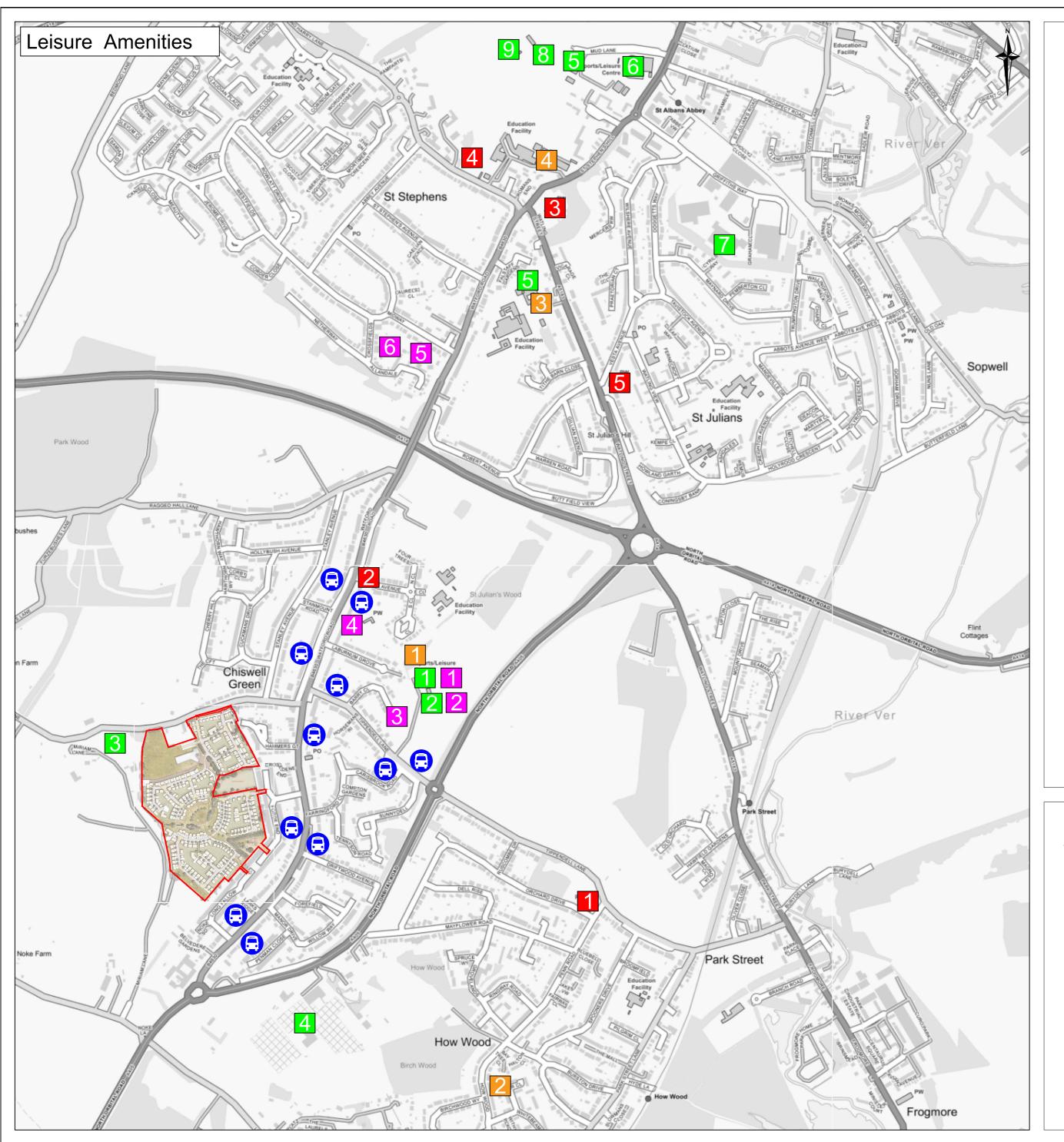
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# Appendix A - Maps illustrating the location of Chiswell Green in relation to local infrastructure



Project: .... A-1





# **Religious Facilities:**

- Park Street Baptist Church
- 2. Green Wood United Reformed Church
- St. Stephen's Church
- 4. St Bartholomew Church
- Brothers of the Sacred Hearth

# **Sports Clubs and Facilities:**

- Greenwood Park Lawn Tennis Club
- Spirit TKD ( ITF Taekwon-Do):
- Chiswell Green Livery Yard and Riding School
- CrossFit Verulamium
- St Albans & Potters Bar Karate (Tiska)
- Harpenden Badminton Club
- 7. Everyone Active Gym and Spa Westminster Lodge
- PureGym St Albans
- St Albans Athletics Club
- Athena Ladies Running Club

# **Local Groups and Communities:**

- 1. Greenwood Park Community Centre
- Chiswell Green Third Age Trust U3A
- Grow Chiswell Green
- 4. Soroptimist St Albans and District
- 5 Verulam Explorer Scout Unit
  - 1st St Albans Scout Group

# **Classes and Extracurricular Activities:**

- Salsa Mish
- Booster Cushion Theatre
- VAKs | St Albans Tutors
- Abbey Theatre

# Key:



Site Boundary



Bus Stop

1

Religious Facilities

1

Sports Club and Facilities

1

Local Groups and Communities

1

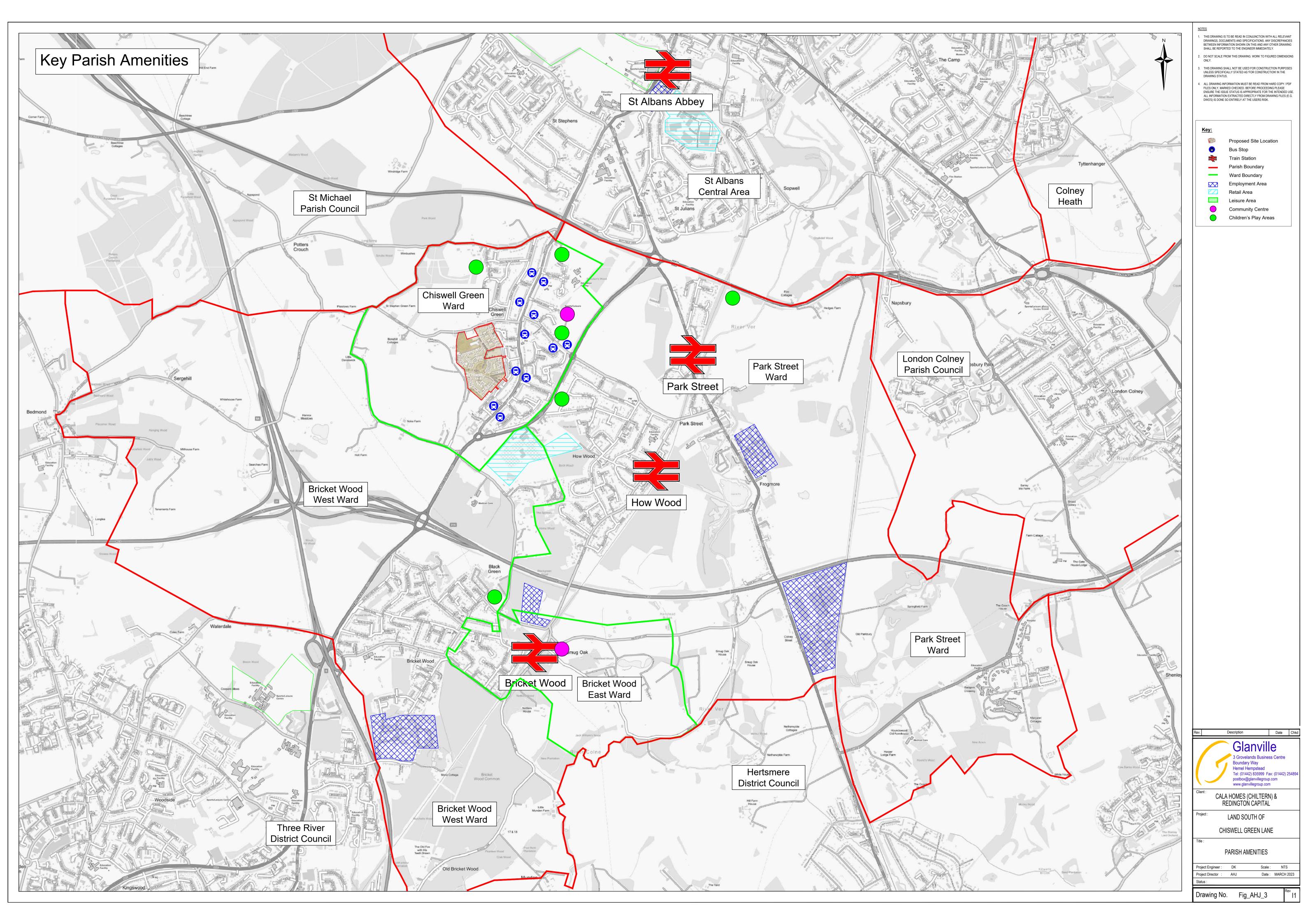
Classes and Extracurricular Activities

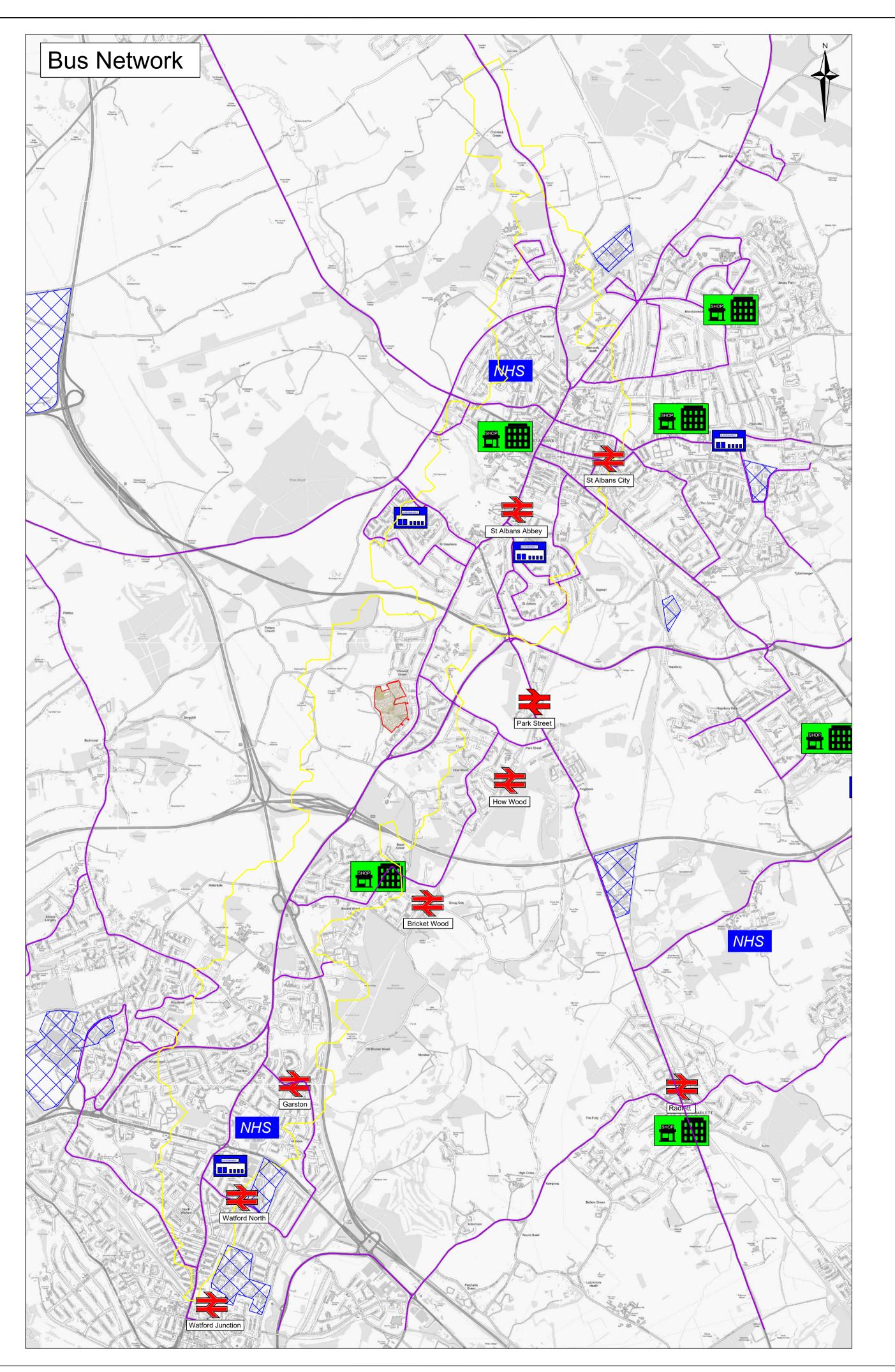


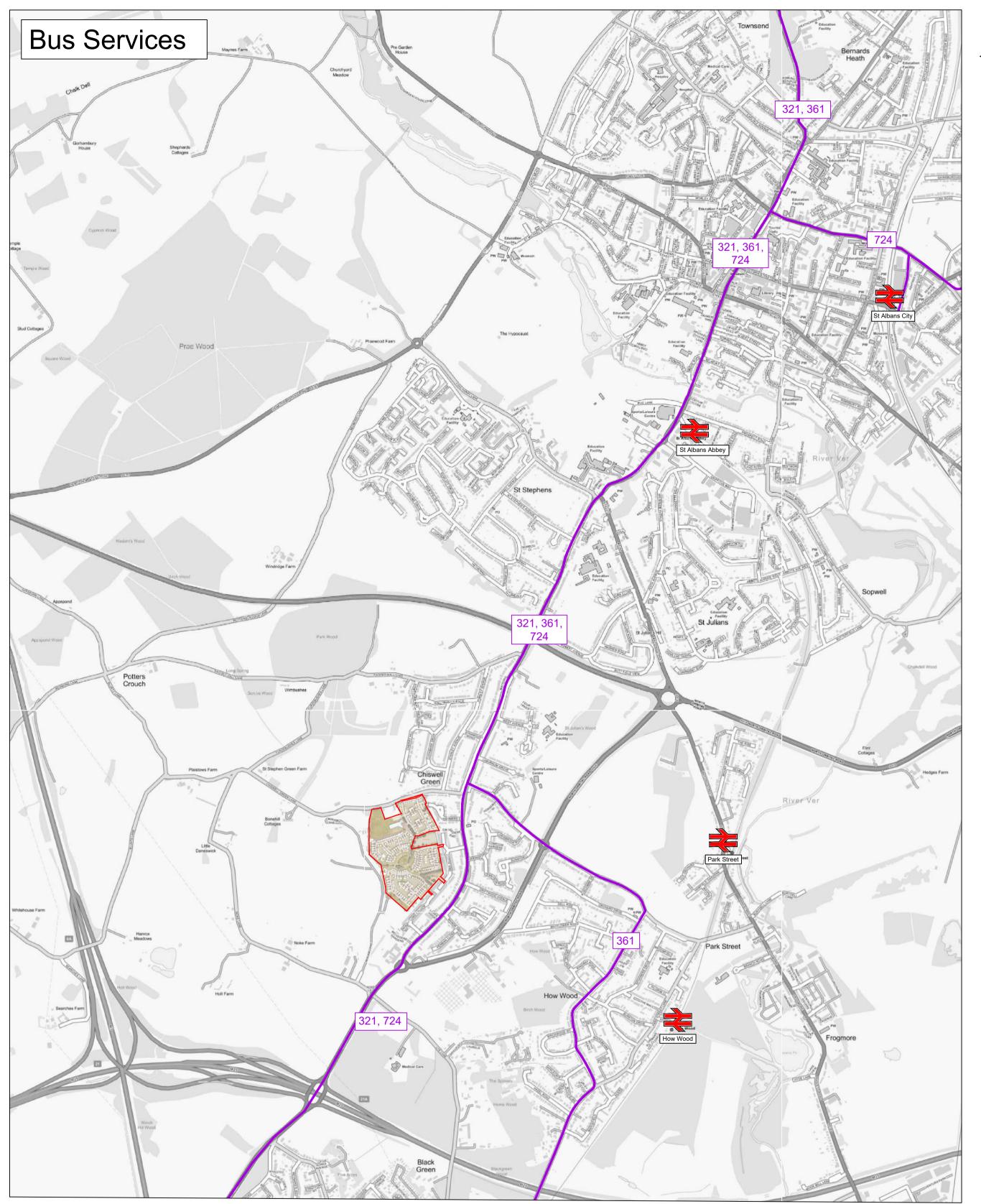
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# Table: Bus Services in Chiswell Green - BusStop (Three Hammers)

No. SERVICE	DESTINATION	FIRST/LAST SERVICE	FREQUENCY	
			AM PEAK	PM PEAK
321 Luton - St Albans - Watford - Rickmansworth	Luton/St Albans	05:58/23:25	3 Buses	3 Buses
	Watford/Rickmansworth	05:56/23:23	3 Buses	3 Buses
361 Garston - St Albans	St Albans	07:51/16:58	1 Bus	1 Bus
	Garston	08:51/17:32	1 Bus	1 Bus
724* Harlow - St Albans - Watford - Heathrow Airport	Watford/Heathrow Airport	05:12/22:01**	1 Bus	1 Bus
	St Albans/Harlow	06:27/23:49***	1 Bus	1 Bus

- \* 724 Express Bus Service stops only on dedicated bus stops
  \*\* There are two night services departing at 02:38 and 04:43
  \*\*\* There are one night service departing at 01:49

Average Bus Journey Time Isochrones (NTS 2021) takes into count the time allowed walking from the site to the bus stop and from last stop plus a 10min walk. The length of time between different bus services is limited to 10min.

# Table: Average Bus Journey Time

DESTINATION	JOURNEY TIME (min)	
How Wood Train Station	27	
St Albans Train Station	29	
Watford Junction Train Station	40	
St Albans City Centre	20	
Watford City Centre	43	
St Albans Hospital	44	
Watford General Hospital	59	
Brick Knoll Business Park	48	
Porters Wood Business Park	45	
Hemel Hempstead Maylands	71	
North Watford Business Park	34	

Glanville 3 Grovelands Business Centre Boundary Way Hemel Hempstead Tel: (01442) 835999 Fax: (01442) 254894 postbox@glanvillegroup.com www.glanvillegroup.com CALA HOMES (CHILTERN) & REDINGTON CAPITAL LAND SOUTH OF CHISWELL GREEN LANE **BUS NETWORK** 

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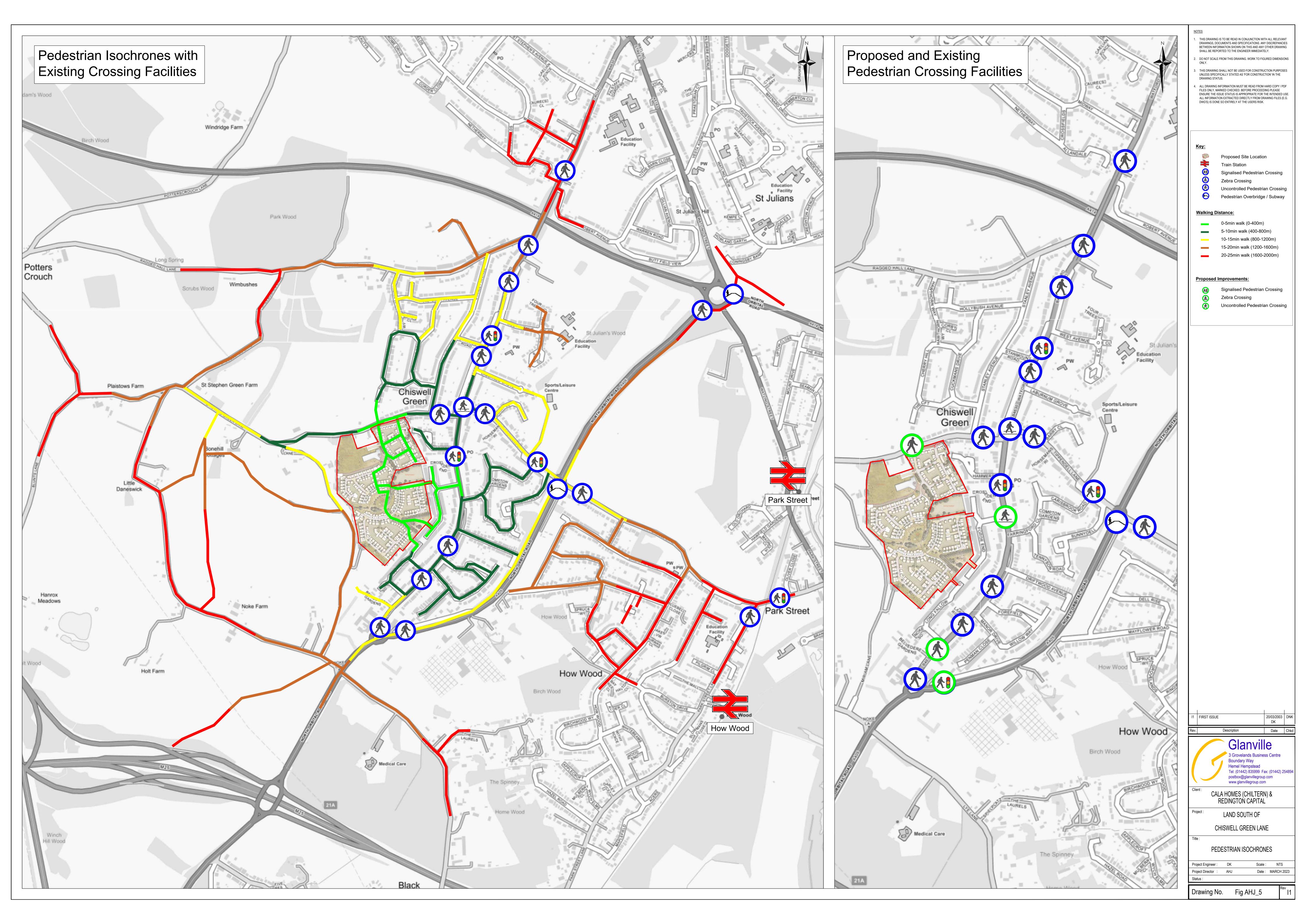
Proposed Site Location

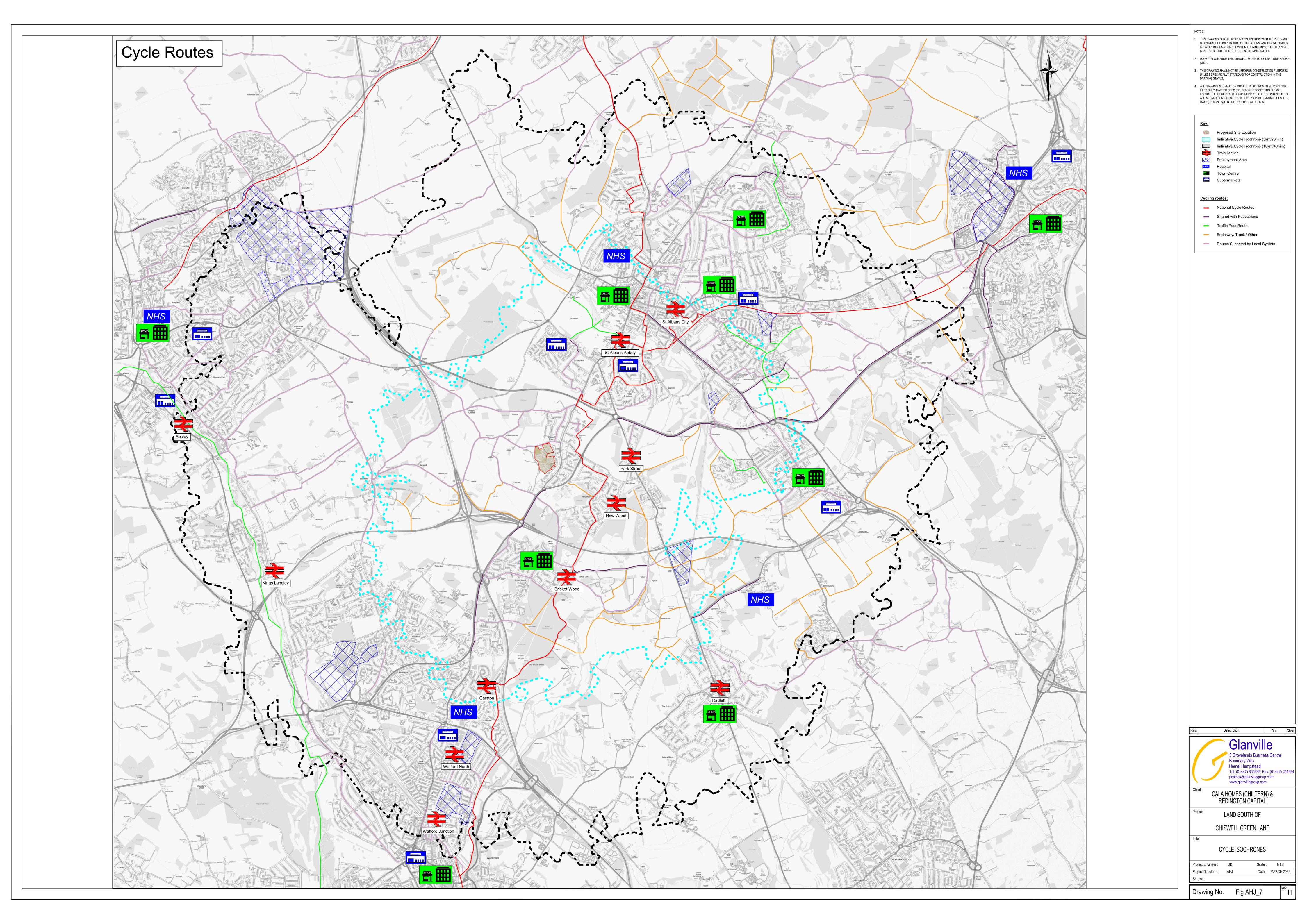
Average Bus Journey Time Isochorne (39min)

Employment Area Hospital

Supermarkets

Drawing No. Fig\_AHJ\_4





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