Matter 2 – Housing Growth and Spatial Strategy

Statement on behalf of

Vistry Group

St Albans City and District Council Local Plan Examination

April 2025



Contents

- 1. Introduction
- 2. Response to Matter 2 Questions

Appendices

Appendix 1 Regulation 19 Submissions 2024

Steven Kosky BA (Hons) DipTP MRTPI steven.kosky@turley.co.uk

Client Vistry Group Our reference BOVC 3000

1.0 INTRODUCTION

- 1.1 This Matter Statement has been prepared by Turley, on behalf of Vistry Group (Vistry) pursuant to the St Albans City and District Draft Local Plan 2041, Examination. Vistry has a significant site interest in the Broad Allocation (B3) West Redbourn, in St Albans District and has made previous representations to the Regulation 19 Public Consultation, in 2024, which are appended to this Statement.
- 1.2 Vistry Group is one of the leading housebuilders in the country and delivers thousands of new homes every year for both the private and affordable market places. The Group was formed in 2020 and the integration of Countryside Partnerships into Vistry, in November 2022, has made Vistry the largest provider of affordable homes in the UK. The Group also includes Linden Homes and Bovis Homes.
- 1.3 This Statement strongly supports the emerging **Broad Location B3: West Redbourn** and the identification of this site for growth in the submitted Local Plan. Vistry does not have an interest in the whole site area of the identified B3 allocation and so this Statement is concerned only with the southern section of the B3 Broad Location, within the control of Vistry, as shown on the red line plan at Appendix 1 of our Regulation 19 submissions.
- 1.4 The site controlled by Vistry at West Redbourn lies north of Gaddesden Lane and east of the M1 and can deliver a high quality residential development. Vistry has promoted this site since 2019 and a Framework Masterplan for the Site was submitted to the Council, as part of Call for Sites exercise, in 2021.
- 1.5 The site controlled by Vistry is the subject of a live outline planning application (reference 5/2021/3631) and was validated in January 2022. The application awaits determination by St Albans City and District Council, following the submission of further information. The outline application proposes the construction of up to 300 new homes including new landscaping, public open space and associated infrastructure works, together with 40% new affordable homes in line with the emerging policy requirements and the 'made' Redbourn Neighbourhood Plan.

2.0 RESPONSES TO MATTER 2 QUESTIONS

Issue 1 - Question 3 - Circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Do any of these circumstances apply to St Albans?

- 2.1 The current development plan is well over 30 years old and the Council has not been able to demonstrate a five year housing land supply for many years. Vistry therefore broadly supports the proposed spatial strategy of the emerging Plan. However the duty to cooperate has been a key defining issue for St Albans in previous Local Plan examinations and so it is important that the new Local Plan adopts a robust approach in meeting actual housing needs, rather than just the prevailing housing requirement at the time, as need and requirement are not the same. The extent of unmet housing needs arising in other areas also does not appear to have been fully quantified.
- 2.2 In our previous submissions, we identified that notwithstanding the likelihood of there being significant unmet needs, that the Council chose not to consider the highest growth alternative of 1,200 dwellings per annum (dpa). Vistry considered that this posed a risk in taking a limited approach and recommended that the Council test the higher growth scenario, as a reasonable alternative, to ensure that the new Local Plan was as robust as possible, going forward. We note in this regard that on 16th October 2024, at a meeting of the Full Council, that Members resolved to approve the draft Local Plan (inclusive of the Site B3 Allocation) based on a growth scenario of 885 dpa.
- 2.3 However, the changes to the standard methodology for calculating the annual housing requirement, has raised the annual requirement in St Albans from 885 dpa to 1,544 dpa, which is a step-change increase of 659 homes or 75% per annum. These greater housing numbers will need to be accounted for at some stage, either through this emerging Local Plan or via an immediate Local Plan review. This places a premium on existing emerging allocations which are already well advanced in the planning system and which are both sustainable and deliverable, such as the Vistry site at West Redbourn.
- 2.4 Whilst broadly supportive of the Local Plan, Vistry considers that there is scope within the current emerging Local Plan to further increase housing supply, rather than deferring all of the additional 659 new homes per annum to future plan-making. Whilst under the transitional arrangements (Paragraph 234 of the NPPF) the requirement is technically being met, the extreme age of the existing Local Plan and the large disparity between the annual requirement upon which the emerging Local Plan is based, and the up to date assessment of housing need, suggests that it is appropriate to give weight to the actual housing need, which is higher than the standard method which informs the new Plan.
- 2.5 However Vistry also considers that it is critical that the new Plan proceeds in a timely, and objective manner, taking into account these unmet housing needs as far as possible. It is also important not to unnecessarily hinder the Local Plan process in meeting these needs, which is vital to ensure certainty for the development industry and the residents of St Albans alike, so as to enable much needed new housing delivery as soon as possible.

Issue 4 - Question 1 - Does the spatial strategy reflect the size, role and function of settlements in Policy SP1?

- Vistry considers that the Spatial Strategy of the new Local Plan does generally reflect the size, role and function of settlements in the district, with the scale of urban extensions proposed being suitable for the settlements to which they relate, as is the case with the proposed allocation at Redbourn. Vistry therefore strongly supports the identification of growth to the west of Redbourn and Broad Location B3.
- 2.7 Strategic sites of this nature, at large sustainable settlements such as Redbourn, will help to address the accrued major shortfalls in past housing delivery and the suppression of household growth, as evidenced by the current lack of housing land supply, as soon as possible, whilst having sufficient critical mass to provide new community infrastructure.
- 2.8 This will help to begin the process of mitigating the unsustainably high housing costs in the district and the lack of affordable housing. The additional benefits of the approach taken by the spatial strategy will also be to help stimulate the local economies of the relevant settlements selected for growth.

Statement of Common Ground

- 2.9 Pursuant to the delivery of the Vistry element of the B3 allocation. Vistry has agreed a Statement of Common Ground with St Albans Council, on a without prejudice basis. The agreed common ground is that the Council and Vistry generally support what is set out in the Local Plan Part A and the Local Plan Part B, including the Key Development Requirements for site B3.
- 2.10 The Statement of Common Ground identifies that there are currently no matters of general disagreement between the Council and Vistry Group on the Local Plan and that the Council will continue to work with Vistry Group on the delivery of site B3 in the Local Plan Part B up to and beyond the adoption of the new St Albans Local Plan.

Appendix 1 Regulation 19 Representations

Vistry Controlled Land within Broad Location B3: West Redbourn



