



The countryside charity
Hertfordshire

St. Albans City & District Local Plan

EXAMINATION HEARINGS

Matter 2:

Housing Growth & Spatial Strategy

STATEMENT

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On Behalf of

**CPRE Hertfordshire – the countryside
charity**

April 2025

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of CPRE Hertfordshire – the countryside charity (CPREH). It has been compiled in response to the invitation by the Examination Inspectors' invitation to participate in Stage One of the Hearings into the soundness of the St. Albans City & District Local Plan.
2. A full summary of CPREH's views on the pre-submission Local Plan can be found on LPCD 20.03 Regulation 19: Responses by Submissions (Submission 288). This may be referred to as appropriate in the discussions, but this statement is concerned with Matter 2: Housing Growth and Spatial Strategy. It will be used as the basis for the CPREH contribution to the hearing sessions, under the guidance of the Inspectors.

Issue 1: Local Housing Need

3. The Inspectors' Note (paragraph 14) refers to paragraph 61 of the NPPF which states that strategic policies should be informed by a local housing need assessment , conducted by 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. It is the strong view of CPREH that "exceptional circumstances" do exist for the preparation of this Local Plan.
4. In response to the Inspector's Questions 1 and 2, the overall plan period (to 2041) for the submitted Local Plan is clear to potential users. The suggested stepped delivery of dwellings and the proposed main modifications to policies may not be so apparent.
5. At previous iterations of the Local Plan review, CPREH has expressed its dissatisfaction with the use of the Government's standard method of calculating housing needs. Inevitably, this has been based on out-of-date projections of national housing growth and net migration statistics. As argued below under Matter 2, the reluctance of the Council to apply policy constraints such as Green Belt results in additional complications in setting a housing target.

6. In its earlier representations, CPREH has also referred to alternative approaches to calculating housing need. These highlighted the scale of the difference between using the much lower levels of need calculated by using the previous standard method and the last sets of household projections (i.e. methods using local data) and the new standard method.
7. The PPG does state that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. In response to Question 3, however, CPREH would argue that there are circumstances where the figure should be much lower, as in the St. Albans City & District.

Issue 2: The Housing Requirement

8. In the view of CPREH, the Council have failed to determine the housing requirement in a proper manner. As explained below and under Matter 3, the unique setting of St. Albans and the policy context constitute “exceptional circumstances” which need a more constrained approach to calculating the requirement.
9. At the outset of the process, the Council have not paid heed to the NPPF paragraph 11, which states that:

“Plans and decisions should apply a presumption in favour of sustainable development.

*For **plan-making** this means that:*

(b) strategic plans should, as a minimum, provide for objectively-assessed needs for housing and other uses, as well as any other needs that cannot be made within neighbouring areas, unless:

i the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type, or distribution of development in the plan area.”

10. Attached to the above is a footnote (7) which refers specifically to the Green Belt. As the whole of the City & District, apart from the excluded settlements, is included in the Green Belt, it is arguable that exceptional circumstances do exist. The footnote also refers to designated heritage assets, which would include St. Albans Abbey and its setting. It also refers to habitats, which would include the Chilterns Beechwoods SAC designation, to which the Council should have considered at the outset when embarking on the calculation of the housing requirement. In CPREH's views all of these factors reinforce the case for a more conservative approach to the provision of housing. This point will be developed in more detail under Matter 3.
11. These factors provide the context for setting a housing requirement figure. CPREH would emphasise that this is not the same as "housing need", as implied throughout the Local Plan.
12. To summarise the above points, CPREH is surprised that the scope of the Inspectors' questions does not include a consideration of the methodology and the assumptions used in the calculations. Nevertheless, whether one accepts them or not, the calculations themselves are accurate, but the consequent housing numbers do not reflect fully the advice in both the NPPF and PPG.
13. From its response to the Inspectors' Initial Questions (HOU 01.02), it is clear that the Council accept that the housing delivery rate of 885 dwellings per annum over the plan period is not realistic. The recommended stepped approach is well-evidenced and realistic, given the characteristics of the local housing market. The conclusions of the Lichfield's "Start to Finish" 2024 report provide an insight into the performance of the housing market outside London, but the slow pace of delivery is more pronounced in Hertfordshire.
14. In these circumstances, CPREH would accept a proposed stepped approach to housing provision. The Council have set out their reasoning in HOU 01.02, but there is another advantage in that a lower rate of delivery, coupled to an early review of the Local Plan, would be more appropriate. In CPREH's view, it would provide an interim strategy prior to the completion and approval of a South West Hertfordshire Joint Strategic Plan, coupled to the anticipated review of local government in Hertfordshire.
15. The inclusion of the stepped approach is necessary for the soundness of the Local Plan. In answer to Question 3, it would be appropriate to set this out in both SP1 (in outline) and in SP3. The latter should be accompanied by a detailed list of sites (duly assessed) in Table 3.1.

Issue 3: Settlement Hierarchy

16. The concept of a settlement hierarchy has been a key element of planning policy in Hertfordshire since the approval of the County Structure Plan in 1979. This has been reflected in the Local Plans which were adopted by the ten District/Borough Councils. It is a policy framework which has been supported by CPREH throughout.
17. The Inspectors refer to the City and District of St. Albans Settlement Hierarchy Study Part 1 (LPCD 13.01). The settlement profiles described in Chapter 4 of the study are familiar to CPREH – their characteristics and function have changed little in over 40 years. In response to the Inspectors' Question 1, CPREH believes that the assessment does reflect the form, role, and function of settlements, as depicted on Table 1.3 and Figure 1.2 of the Submission Local Plan.
18. With regards to Questions 2 and 3, the scores used in the assessment are generally accurate and robust. The way in which the settlements have been assigned to the tiers is clearly described and justified. More detail could have been obtained on facilities and services within the settlements, but this could only have been done by means of a more sophisticated survey base. The study notes the existence of a number of Neighbourhood Plans, which help to substantiate the evidence base. It can be concluded that the hierarchy is justified, effective, and sound.

Issue 4: Distribution of Housing Growth

19. In response to the Inspectors Questions 1 and 3, the spatial strategy is generally in line with the size, role, and functions of the settlements in Policy SP1. From Figure 1.3 of the Submission, it is also clear that most of the broad locations for housing development are located within or adjacent to the Tiers 1-3 settlements. The one exception is at Harper Lane, which arguably is linked more to Radlett than St. Albans. Much of the proposed housing provision will be provided adjacent to Hemel Hempstead in the Hemel Garden Communities Project (HMC) to which CPREH has consistently registered its concerns.
20. The justification for referring to sites of over 250 dwellings as “broad locations” is not fully justified. In the view of CPREH, these are not “broad”, they are specific and require to be assessed against Green Belt policy in the NPPF. From the Local Plan Site Selection Paper (LPSS 02.02) it is clear that the principal driver in the determination of these allocations has been the Housing and Economic Land Availability Assessment (HELAA). Thus, the original Call for Sites has had a major influence on the broad locations.

21. In its response to the Regulation 19 consultation, CPREH considered that the role of the Green Belt was not given sufficient weight in the making of the Local Plan. It would appear to CPREH that the Council's view is that, apart from Tiers 1 – 3 settlements the whole of the area is covered by Green Belt. Green Belt is regarded as a constant, so the principal concern is tackling the climate emergency, coupled to sustainable development. This is wrong – the protection of the Green Belt is a duty of the Council and should be given due prominence in the Local Plan.
22. The availability of land within urban areas is a key factor in the determination of the spatial strategy, and may have been underestimated. To illustrate this point, CPREH compiles an annual monitor of the Brown Field Registers of the ten Hertfordshire local planning authorities. The latest report (February 2025) shows that there are potential sites which could provide a minimum of 29,580 dwellings in the county. This is a year-on-year increase of 43%, as seven of the authorities had not updated their registers.
23. For the purposes of this Examination, the City & District have referred to their Urban Capacity Study. They have also updated their Brown Field Register (December 2024), which now shows 42 sites totalling 33.64 hectares, which could provide a minimum number of 1,535 dwellings. The update is welcome, but CPREH believes that the number of dwellings is an underestimate. There has been no assessment of what could be provided with an increase in density assumptions, particularly for sites which have good access to public transport or local facilities. In many town centres, densities of 100 dwellings per hectare are realistic. These density assumptions are routinely included in Local Plans in other parts of England.

Issue 5: Site Selection Methodology

24. It is understood that this part of the hearing sessions is concerned with the Local Plan Site Selection – Proforma Methodology Paper, published by the Council in September 2024 (LPSS 02.02). Although CPREH has comments on individual sites, these will be made at Stage 2 of the Examination, as appropriate. The Inspectors have noted that the starting point for the site selection methodology was the HELAA which produced 678 sites for analysis. Of these, 566 sites were selected to proceed to the next stage. In response to the Inspectors' Question 1, it was not clear to CPREH as to how this was done. It may have been consistent, but it was not transparent.

25. The methodology and the staged approach to the production of proforma is well-described and was a rigorous process, summarised in Tables 1 and 2 of the paper. The main input was the HELAA, but combined with the Green Belt Review (GBR) Stage 2 (2023). This produced the series of sub-areas for assessment. Although the degree of detail is impressive, CPREH believes that site selection should also have been informed by a more strategic approach focused on the potential of more extensive tracts of land. There does not appear to be an attempt to secure intensification of development, for instance by examining opportunities for large scale regeneration of low density, low-rise 20th century housing and employment areas.
26. In response to Question 2, CPREH believes that the principle of “buffers” taking land out of the Green Belt is wrong, as land should only be removed from the Green Belt in exceptional circumstances. As argued in the CPREH statements, none have been demonstrated. In any case, it is questionable whether the drawing of “buffers” was appropriate for all the settlements excluded from the Green Belt. There are many areas where the inset boundary is adjacent to high quality countryside which makes a major contribution to Green Belt purposes. Further comment may be made at Stage 2 of the Examination.
27. Table 2 of the Paper shows clearly which constraints were used to establish the “sustainable development potential” of each site. The Inspectors rightly query (Question 3) the use of distance in determining accessibility – there are other factors, particularly the possibilities for active travel using facilities such as the disused railway branch lines. Accessibility by public transport and by other sustainable modes is the key criterion.
28. An omission appears to be the lack of consideration of the necessary infrastructure requirements of the potential sites (Question 4). In the view of CPREH this should be integral to the analysis – coupled to the Infrastructure Development Plan.
29. With regards to Inspectors’ Question 6, CPREH has noted the reference in paragraph 1.31 of the Paper that some sites not recommended for further consideration by the GBR Stage 2 were selected for further progress by the proformas. This is some concern to CPREH, as many of the sites had been identified as being in the “high harm” category. Their selection for development is clearly in conflict with the aims and purposes of the Green Belt as set out in the NPPF.

30. Although the Paper describes a very rigorous process of analysis, the reasons for selecting the sites are not fully explained, This point is picked up by the Inspectors in Question 7 – the answer is critical to the Green Belt issue. In conclusion, CPREH can appreciate that the process was detailed and robust, subject to comments made above. With regards to the input from the GBR Stage 2, CPREH will have further points to make under Matter 3 of these Hearings.

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Hertford

11th April 2025