



St Albans City & District
Council's
Draft Local Plan 2041
(Stage 1) - Examination in
Public

Matter 2

Housing Growth and Spatial Strategy

Statement on behalf of BRiCS Development

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Contents

1. Introduction	1
2. Response to Matter 2: Housing Growth and Spatial Strategy	7

1. Introduction

- 1.1 This Statement is submitted on behalf of BRiCS Development Ltd (hereafter referred to as 'BRiCS' or 'the Applicant') in relation to Matter 2 (Housing Growth and Spatial Strategy) of the St. Albans City and District Council's ('SACDC') Local Plan 2041 Examination. BRiCS have been promoting 'Land West of Lamer Lane, Wheathampstead' (the 'Site') throughout the plan-making process. The location of the Site is shown in Figure 1. The Site is in a highly sustainable location, located within convenient proximity to Wheathampstead. The Site is currently located within the Metropolitan Green Belt and is located adjacent to the existing settlement area of Wheathampstead.



Figure 1: Site Location Plan

- 1.2 There are no other technical or environmental constraints which

would preclude development of the Site. The Site would represent a logical extension to Wheathampstead to the north.

- 1.3 The Site has been previously submitted to the Call for Sites consultations in 2016 and 2021, as well as the Wheathampstead Neighbourhood Plan in Autumn 2017. In September 2023, representations for the Site were made to the SALP Regulation 18 consultation, with Regulation 19 representations made in November 2024.
- 1.4 Our Regulation 19 representations provide further background to the Site and its credentials for development, points which are not repeated in this Statement.
- 1.5 The Site has undergone a masterplanning process, details of which were submitted in support of the Applicant's Regulation 19 representations. The outcome of this is that the Site is considered to have capacity for between 98 and 130 dwellings (depending on 30-40dph) alongside 1.3 acres of land dedicated to specialist care housing (Use Class C2). This means the Site could either meet SACDC's definition of a 'medium and small site (5-99 dwellings)' or the lower end of the spectrum of a 'large site (100-249 dwellings). This has relevant to **Issue 4 Q4**.
- 1.6 In addition, although not specifically related to the Matters contained in the Stage 1 Hearings (and it is currently unclear whether this issue will be discussed at the Stage 2 Hearing sessions), we would like to reiterate to the Inspector the potential effect of the proposed National Landscape extension (which has not been consulted upon, and the details are unknown, **Appendix 1**). Despite the lack of weight to this future consultation, SACDC have deleted 2 proposed allocations in Wheathampstead, which is unwarranted. This is set out in our representations (refer to Section 4) and is raised where relevant in

answer to the Inspectors questions.

- 1.7 Notably, Policy NEB11 of the draft SALP has been drafted on the anticipation of an extension to the boundary of the Chilterns National Landscape into the District. This has resulted in a number of deleted allocations in the Regulation 19 SALP. At this stage, the extent of the proposed boundary variation to the Chilterns National Landscape is unclear, with the first stage of consultation scheduled for Summer 2025. It is therefore not justified for the SALP to pre-determine the boundary changes to the Chilterns National Landscape, as the proposals for the boundary extension are not material and haven't been tested through Examination by the Secretary of State.
- 1.8 The Applicant's Regulation 19 representations conclude that given SACDC's track record of poor housing delivery (linked to the absence of any Plan since 1994), the removed allocations at Wheathampstead should be reinstated, and further allocations should be made at sustainable locations (such as Wheathampstead) in order to ensure the SALP is sound.
- 1.9 Small-medium scale sites that do not contribute to the purposes of the Green Belt should be considered for development in the Local Plan, such as 'Land West of Lamer Lane'. The Site can be delivered in the short-term, is sustainably located adjacent to the existing settlement area of Wheathampstead and is in single ownership, as well as being bounded by existing built development.
- 1.10 Additionally, SACDC's Stage 2 Green Belt Review (June 2023) score for Land West of Lamer Lane (SA-43) confirms that the Site does not make a strong contribution to purposes a), b) and d) of the Green Belt. It is therefore considered the Site would be classed as 'Grey Belt', for the purposes of the new national planning guidance. The Site can therefore help to contribute to meeting the local housing needs of SACDC.

- 1.11 This Statement (Matter 2) should be read alongside the Matter 3 Hearing Statement submitted by ET Planning on behalf of BRiCS.

2. Response to Matter 2: Housing Growth and Spatial Strategy

Issue 1: Local Housing Need

14. *"To determine the minimum number of homes needed, paragraph 61 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted 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. The PPG advises that the standard method provides local planning authorities with an annual housing need figure which can be applied to the whole plan period."*

Q2 - 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?

- 2.1 BRICS' Regulation 19 representations highlighted one of our main concerns with the SALP, relates to the provision of housing. This is set out in our representations from paragraph **2.6-2.21**.
- 2.2 The new NPPF and Standard Method figures indicate that the Local Housing Need for SACDC is 1,660 dpa (775 dpa higher than the proposed SALP figure). This would equate to a housing need of 27,390 dwellings across the 16.5-year Plan period horizon (an increase of 12,787 dwellings over the whole Plan period compared with the draft SALP).
- 2.3 Although SACDC have met the transitional arrangements, set out in paragraph 234b of the NPPF 2024, which enables them to use the provisions of the old Standard Method and NPPF 2023, it is clear that their proposed housing requirement meets less than 80% of Local Housing Need set out in the new Standard Method figures. As such,

paragraph 236 of the new NPPF 2024 will apply, which states:

"Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need."

- 2.4 SACDC will therefore be required to review the proposed SALP as soon as the emerging Plan comes into effect, in order to address the shortfall in housing need, given they are only meeting 53% of their Local Housing Need figure under the new Standard Method.
- 2.5 As concluded in our representations, it is necessary for SACDC to begin planning for additional housing growth in order to demonstrate a deliverable supply of housing sites. Given SACDC's poor track record of carrying out Local Plan Reviews, we consider that at least 80% of their Local Housing Need figure should be provided for as part of this Plan Review (so as to avoid the need for a further Plan Review in the immediate future, as per paragraph 236 of the NPPF 2024).

Issue 2: The Housing Requirement

16. *"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".*

Q2 - In response to the Inspectors' Initial Questions, the Council suggests that Policy SP3 should be modified to include a stepped requirement. Is this necessary for soundness, and if so, what should the housing requirement be?

- 2.6 It is clear from the Council's response to the Inspector's Initial Questions (SADC/ED34) that the stepped trajectory would lower the housing requirement for SACDC until 2031, with the shortfall made up from 2031 onwards.
- 2.7 As highlighted in paragraphs **2.14-2.21** of our representations, the draft SALP relies disproportionately on large strategic sites to deliver the housing requirements across the Plan period. This is especially the case for specialist care accommodation. For example, 82.5% of delivery through the proposed site allocations is via large sites of 100 dwellings or more (as evidenced by Table A1.1 of the draft SALP – extract below).

Table A1.1 – Allocation sites in the Local Plan

Site Category	Site Prefix	No. of sites	Housing totals
1 - Hemel Garden Communities - Broad Locations	H	4	4,300
2 - Broad Locations – 250+ homes	B	8	4,227
3 - Large sites – 100-249 homes	L	3	385
4 - Medium and Small Sites – 5-99 homes	M	19	856
5 - Green Belt - Previously Developed Land	P	3	137
6 - Sites Within Urban Settlements (HELAA)	U	3	43
7 - Sites Within Urban Settlements (Urban Capacity)	UC	54	860
8 - Other Sites	OS	4	0
All residential sites - total		98	10,808

Figure 2: Proposed Allocation Sites Summary (Table A1.1 of the draft SALP)

- 2.8 The proposed stepped trajectory is the Council's acknowledgement of this disproportionate reliance on large strategic sites. This approach of focusing delivery towards the end of the Plan period is wholly unsound as its neither positively prepared or effective. The use of a stepped trajectory appears to be necessary for the Council to maintain a 5-year housing land supply (and therefore it is necessary for the soundness of the Plan).

- 2.9 Instead, it is considered that SACDC should allocate more small-medium scale housing sites to make up this shortfall. This approach would be sound, as it responds appropriately to the Local Housing Need requirements, rather than relying on sites to come forward toward the end of the Plan period. This approach is endorsed by paragraph 73 of the NPPF 2023.

Issue 3: Settlement Hierarchy

17. *"The St Albans City and District Council Settlement Hierarchy Study Part 1 Baseline (LPCD 13.01) maps areas of development that have taken place since the Local Plan Review 1994, but remain in the Green Belt. It confirms that (for the purpose of the assessment), the defined settlement areas should therefore remain as shown in the Local Plan Review 1994".*

Q2 - Are the scores used in the settlement hierarchy assessment accurate and robust?

Q3 - 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?

- 2.10 BRiCS consider that the settlement hierarchy (particularly in relation to Wheathampstead as a Tier 4 ('Large Village') settlement) has not been appropriately justified. We have set out our reasoning in paragraphs **2.2-2.5** of our representations.
- 2.11 The Settlement Hierarchy Report (June 2023) and the draft SALP include 7 tiers in the proposed settlement hierarchy (as shown in Table 1.3 of the draft SALP). Wheathampstead is classed as a Tier 4 settlement.
- 2.12 Whilst the Applicant does not object to such a large hierarchy, it falsely gives the perception that the Council are spreading development across a range of settlements when in fact the first 3 tiers of the settlement hierarchy only include one settlement per tier (Hemel Hempstead is included as a second settlement in Tier 1 however it is located in Dacorum).

- 2.13 Wheathampstead is therefore the fifth largest settlement within SACDC (which makes the Tier 4 categorisation slightly misleading).
- 2.14 Despite the settlement's prominence in the hierarchy, the Council are only proposing a few small scale housing allocations in Wheathampstead. It is noted that the other Tier 4 settlement Redbourn is accommodating growth equating to roughly 600 units in total.
- 2.15 Whilst the Applicant does not object to such a large hierarchy, the Council appear to be using Wheathampstead's Tier 4 categorisation to sidestep growth in an acknowledged sustainable location. It is considered that the settlement hierarchical approach adopted in the draft SALP is unsound.
- 2.16 In addition, the Applicant considers that the sustainability credentials of Wheathampstead have been underplayed by the Council (despite its ranking). The Settlement Hierarchy Report (June 2023) does not give appropriate weighting to the proximity of settlements to higher order settlements. Wheathampstead is sustainably located and well-connected to Harpenden, a Tier 2 settlement.
- 2.17 In order to make the Draft Plan sound, the Council should adopt an approach which spreads growth throughout the District in a manner which is proportionate to the settlements ranking and capacity. This would be a more effective way of meeting area-specific housing needs. This approach is also pivotal for an authority which has 81% of its land area as Green Belt, to ensure that growth is located proportionately and fairly across the District.

Issue 4: Distribution of Housing Growth

19. *"Policy SP1 also states that broad locations are defined as sites of over 250 dwellings or strategic scale employment sites".*

Q4 - Has the Council identified land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, as required by paragraph 70 of the Framework?

2.18 BRiCS reiterate their points made in this Statement in relation to **Issue 2 Q2**, as well as paragraphs **2.14-2.21** of the Applicant's Regulation 19 representations.

2.19 As per paragraph 70 of the NPPF 2023, the Council should be allocating 10% of their housing requirement on land no larger than 1 hectare. It is however clear from **Figure 2** on page 8 that the Council have grouped medium and small sites together (5-99 homes) and do not appear to have a way of assessing compliance with paragraph 70 for sites under 1 hectare.

2.20 Paragraph 70 of the NPPF 2023 states that:

2.21 *"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly"*

2.22 We consider that Draft Plan has ignored the requirement of Paragraph 70. As covered in **Issue 2 Q2**, it is clear that the SALP is relying on large strategic sites to deliver the housing requirement across the Plan period, and this skew is evident in **Figure 2**.

2.23 In order to remedy this, the Draft Plan should:

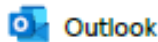
- i. allocate 10% of their housing requirement on land no larger than 1 hectare, and
- ii. Provide a range of small and *medium* sized sites, as per 2.17 above (particularly if there is an insufficient pool of small sites to meet i).
- iii. Also provide more larger sites (in the range 100-150 dwellings), given the issues identified with the stepped requirement in **Issue 2 Q2**.

2.24 This would ensure that the Draft Plan is more targeted at SME developers and would enable more flexibility in the delivery of housing, if the delivery trajectory of strategic sites slow (as SACDC would be less reliant on a small number of larger sites to meet their housing need).

Appendix 1 – Email from Natural England

4/11/25, 3:51 PM

Mail - Tom Ryan - Outlook



FW: EXTERNAL FW: Chiltern Boundary Extension Consultation - Dates?

From SM-NE-ChilternsAONBboundaryreview (NE) <ChilternsAONBboundaryreview@naturalengland.org.uk>
Date Wed 2025-03-19 10:27 AM
To Tom Ryan <Tom.Ryan@etplanning.co.uk>

Hello Tom,

Thank you for your email. We do not yet have a confirmed consultation date but are still working towards our current timescales of a consultation in Spring/Summer 2025.

Kind regards,
Angela Simmons
Landscape Designations Project Officer

From: Tom Ryan <Tom.Ryan@etplanning.co.uk>
Sent: 18 March 2025 09:58
To: SM-NE-ChilternsAONBboundaryreview (NE) <ChilternsAONBboundaryreview@naturalengland.org.uk>
Subject: Re: EXTERNAL FW: Chiltern Boundary Extension Consultation - Dates?

Good Morning Angela,

I am just wondering if there is any update on the consultation dates for the Chiltern Boundary Extension?

Kind regards,

Tom Ryan BSc (Hons) MSc MRTPI
Principal Planner | ET Planning



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