

ET Planning

St Albans City & District
Council's
Draft Local Plan 2041
(Stage 2) - Examination in
Public

Matter 4

Type and Mix of Housing

Statement on behalf of BRiCS Development - Site Ref. WH- 25-21

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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 4 (Type and Mix of Housing) of Stage 2 of the St. Albans City and District Council's ('SACDC') Local Plan 2041 Examination. BRiCS have been promoting **'Land West of Lamer Lane, Wheathampstead' – reference WH- 25-21 (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

- 1.1 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.
- 1.2 Our Regulation 19 representations provide further background to the Site and its credentials for development, points which are not repeated in this Statement.
- 1.3 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).
- 1.4 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.
- 1.5 **The Site was only discounted as part of the SACDC's final sift of sites.** By way of background, 642 sites were submitted to SACDC for consideration (SADC/ED81 - Site Sifting Process Addendum). There were three sifts, which reduced the pool of sites down each time to a final sift of 109 sites. 'Land West of Lamer Lane' made it through to the final sift but was discounted at the last stage on Green Belt grounds.

- 1.6 As made clear in the Applicant's Regulation 19 representations, we consider that SACDC will need to make additional allocations in order for the Plan to be found sound. Given that the Site was discounted at the final sift and can meet the definition of 'Grey Belt', we consider that **'Land West of Lamer Lane' is ideally placed to be selected as an additional allocation, particularly as housing has been underprovided in Wheathampstead and the proposals include an element of specialist accommodation**, which is not adequately met by the Draft Plan.
- 1.7 This Statement (Stage 2 - Matter 4) should be read alongside the Stage 2 - Matter 2 Hearing Statement submitted by ET Planning on behalf of BRiCS.

2. Response to Matter 4: Type and Mix of Housing

Issue 1: Housing Mix and Density

Q2 - Is the Plan sufficiently flexible enough to adapt to changing circumstances and needs over the plan period?

- 2.1 Policy HOU1 of the draft SALP sets out the Council's policies on housing mix. BRiCS' Regulation 19 representations highlighted that the policy wording, specifically for part a), is too vague and is not appropriately evidenced. For example, there is a lack of detail within the policy wording as to what is required to meet the needs of current and future households.
- 2.2 In addition, it is considered that local variations to housing need is not taken into account. The table in the Policy HOU1 provides a district-wide picture from the SHMA. It is important for housing mix and typologies to be driven by character-led considerations, in order to respond appropriately to local needs.
- 2.3 For example, the Settlement Hierarchy Report (June 2023) confirms that Wheathampstead has a "*population of approximately 4,500 residents, comprised of a high percentage of residents aged 65+ and a lower population of working age than the District average*". There is therefore a clear market need for specialist care (Use Class C2) provision in Wheathampstead, despite there being no allocated sites for this use in the settlement area. This is set out in our representations from **paragraph 2.4**.
- 2.4 In conclusions, BRiCS' position is that in order to be effective and in accordance with national policy, the SALP should encourage the

provision of an appropriate housing mix in a way which balances need and character-led considerations, rather than being overly prescriptive as currently drafted.

Issue 2: Affordable and Specialist Housing

Q2 - Will the Plan ensure that affordable housing needs are met? If not, what modifications could be made to ensure that needs are met in full?

- 2.5 BRiCS' Regulation 19 representations highlighted that the draft SALP is overly reliant on large strategic allocations for housing delivery across the Plan period. This approach is not considered to be positively prepared or effective, as it would mean that affordable housing would likely be delivered towards the end of the Plan period, due to the housing trajectory of the large strategic sites.
- 2.6 In addition, given SACDC's track record of being slow to review their Local Plan, with the current Local Plan more than 30 years old, SACDC should be planning for this uplifted need now, rather than relying on affordable housing delivery later in the Plan period.
- 2.7 In conclusion, BRiCS' position is that SACDC should allocate small-medium scale housing sites in areas such as Wheathampstead that can accommodate a proportionate level of growth (for example, 'Land West of Lamer Lane' in Wheathampstead). This approach would be sound, as it enables adequate affordable housing delivery within the first few years of the Plan period, rather than relying on larger allocations to meet identified housing needs in the longer term.

Issue 2: Affordable and Specialist Housing

Q3 - What are the thresholds for the provision of affordable homes based on and is Policy HOU2 justified (including in respect of Class C2 accommodation)?

2.8 In relation to affordable housing delivery, it is clear that the evidence base does not appear to have fully assessed the viability of the affordable requirement for Class C2 uses.

2.9 BRICS' Regulation 19 representations highlighted that the requirement in criterion c) of Policy HOU2 for Use Class C2 schemes to deliver affordable housing is unjustified. This is because the policy wording does not recognise the difference between different retirement living products, some of which are affordable products in their own right, such as sheltered housing. Other retirement living products are by their nature managed, centralised products where the practicalities of offering an affordable product are extremely difficult.

2.10 In addition, the current wording of Policy HOU3 would undermine the Plan's ability to deliver specialist housing for older people (see Q6).

Issue 2: Affordable and Specialist Housing

Q6 - How will the Plan be effective in meeting the needs identified in Policy HOU3? Is it sufficiently clear in this regard?

2.11 It is evident that Part B of the SALP – Local Plan Sites (September 2024) does not allocate any housing sites specifically for specialist

care provision. As mentioned above, the Settlement Hierarchy Report (June 2023) confirms that there is a clear market need for specialist care (Use Class C2) provision in Wheathampstead, despite there being a lack of allocated sites for this use in the SALP. BRiCS' consider this a key issue with the Plan and that the proposed allocations do not go far enough in allocating sites for C2 use, which are deliverable and can be developed in the short-term to meet local housing needs.

2.12 Secondly, the revisions to Policy HOU3 in the Regulation 19 SALP is inconsistent with national policy. This is because the change in the trigger from 250 dwellings to 500 dwellings in Policy HOU3 has resulted in an overall reduction in the number of specialist care dwellings being provided in the draft SALP. The difference is highlighted within our Regulation 19 representations under **paragraph 2.17.**

2.13 In summary, the net difference in specialist care provision equates to a decrease of 170 units provided in the Regulation 19 SALP, compared with the allocation figures in the Regulation 18 SALP. The decrease in specialist care provision has not been justified in the SALP and therefore it is considered that this would result in a significant under-delivery of specialist care housing across the Plan period as a whole.



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