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# St Albans City and District Local Plan Examination – Hearing Statement to Stage 2

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St Albans Local Plan - Stage 2 Hearing Statement

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# 1. Introduction

- 1.1. We are instructed by the following, to submit a Hearing Statement in response to the Stage 2 of the St Albans City and District Local Plan:
- Smallford Business Park Ltd. (hereafter SBP) who are promoting land at Smallford Works, Smallford Lane, St Albans, AL4 0SA; and
  - Hemel Business Park Ltd. (hereafter HBP), who own and are promoting land at Appspound Lane, St Albans, Hertfordshire.
- 1.2. Both HBP and SBP submitted representations to the Regulation 19 consultation in November 2024, and a Hearing Statement to Stage 1 of the Hearings in April 2025. This hearing statement (submitted by Savills on behalf of both parties) provides additional comments regarding specific questions raised by the Inspectors in their Matters, Issues and Questions document for Stage 2 of the Local Plan hearings, dated 29 August 2025.
- 1.3. This Statement provides a response to the following questions:
- **Matter 3 – Green Belt**
    - *Issue 1 – Green Belt Review*
      - Question 1 - With reference to paragraph 146a of the Framework, has the Council adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land?
      - Question 2 - Does the additional evidence adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously developed and/or is well-served by public transport?
      - Question 3 – Does the evidence demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries?
    - *Issue 3 – Exceptional Circumstances*
      - Question 1 – Do exceptional circumstances exist to alter the Green Belt boundary in St Albans and has this been fully evidenced and justified as part of the plan-making process.
  - **Matter 5 – Economy and Employment**
    - *Issue 1 – Employment Land Requirement and Allocated Employment Site*
      - Question 1 – is the Plan's economic strategy based on proportionate and up-to-date evidence?
      - Question 2 - Noting the Council's hearing statement for Matter 1, Issue 1, Question 5, should the Plan establish requirements for office, industrial and warehousing provision over the Plan period?
      - Question 3 - Is the Plan positively prepared in respect of setting a strategy and identifying land to meet assessed employment needs?
      - Question 4 - How did the Council identify land to allocate for employment uses? Was the site selection process robust, justified and proportionate?

- Question 5 - How will the allocated sites at East Hemel Hempstead (Central) and the Radlett Strategic Rail Freight Interchange assist Dacorum and potentially other South West Hertfordshire authorities in meeting some of their employment needs? Is the policy effective?
- Question 6 - The 2024 South West Hertfordshire Economic Study states that the main barriers to economic growth are the available labour market, with particular reference to an ageing population demographic. Taking this into account, are employment and housing requirements suitably aligned, and will the Plan provide sufficient labour to support the employment strategy?
- **Matter 7 – Residential Site Allocations**
  - *Issue 10 – Colney Heath and Radlett Site Allocations, Policy P1 – Smallford Works, Colney Heath*
    - Question 1 - What is the existing use of the site and is it developable within the plan period?
    - Question 2 - What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?
    - Question 3 - Is Policy P1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

## 2. Matter 3 – The Green Belt

### 2.1. Issue 1 – Green Belt Review

*Question 1 - With reference to paragraph 146a of the Framework, has the Council adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land?*

- 2.1.1. The strategy fundamentally does not make as much use as possible of suitable brownfield sites and underutilised land.
- 2.1.2. Despite the fact that it is a poorly performing, previously developed site that has been actively promoted within the Local Plan process, Appspound Lane was not considered during the Stage 2 Green Belt Review process, and has not been included in the strategy to help meet employment need. It is recognised that the Green Belt review included sites promoted in Call for Sites exercises between 2016-2021, however through the Local Planning Authority relying on this somewhat outdated information and not undertaking an independent assessment of known sites, including those such as Appspound Lane with planning history records available, this means the Local Planning Authority has not been robust in their assessment.
- 2.1.3. The strategy is therefore neither positively prepared nor sound in this regard.

*Question 2 – Does the additional evidence adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously-developed and/or is well-served by public transport?*

- 2.1.4. The additional evidence does not adequately demonstrate that the Plan has given consideration to land which is previously developed. Appendix A of the Green Belt PDL sites, which claims to provide a full list of PDL sites and why they were not allocated makes no mention of Land at Appspound Lane, despite it having been actively promoted, including at Regulation 19 stages and as part of Stage 1 of the Local Plan Hearings. This is particularly disappointing given the previously developed land first approach advocated within the NPPF. Moreover, the Appspound Lane site is well served by public transport which makes it even more disappointing the site has been overlooked for sustainable development through the emerging Local Plan.

*Question 3 – Does the evidence demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries?*

- 2.1.5. Exceptional circumstances obviously exist to alter the Green Belt boundary to accommodate development where need has been clearly established by evidence submitted by representors in the Local Plan Process. As set out in our Regulation 19 representations, the Plan fails to identify supply to meet the employment need within St Albans over the Plan period, despite the fact that it claims to have a surplus due to an overreliance on two largescale sites, including the Radlett SRFI site which has an extant consent from 2014 that has not been brought forward. Green Belt release is therefore justified to increase the supply of employment land.

- 2.1.6. With regard to the Plan's undersupply of employment land, this is addressed below in response to Matter 5. As stated below, we have serious concerns about this aspect of the Plan which is not sound as drafted.
- 2.1.7. However, the selection of sites for removal from the Green Belt must be informed by appropriate evidence. The Green Belt assessment fails to consider brownfield sites such as Appspend Lane, and for this reason the Plan's wider approach is not justified.

### 3. Matter 5 – Economy and Employment

#### 3.1. Issue 1 – Employment Land Requirement and Allocated Employment Sites

*Question 1 – is the Plan's economic strategy based on proportionate and up-to-date evidence?*

- 3.1.1. An Economic study for South West Hertfordshire, prepared by Hatch, and dated September 2024, identified that St Albans had (under a labour supply scenario) a requirement of 6.7ha for industrial, and 22 ha for storage and distribution.
- 3.1.2. The use of a Labour Supply scenario ties the employment demand to the Standard Method, and the level of housing growth which it seeks to drive. Following the publication of the revised NPPF in December 2024, Standard Method housing requirements across the FEMA have risen significantly. Whilst it is appreciated that St Alban's Plan is being examined under the previous NPPF (and the antecedent Standard Method) neighbouring authorities will see their housing requirements increase significantly, as follows:

| Local Planning Authority | Old SM (p.a.) | New SM (p.a.) | Plan Status                     |
|--------------------------|---------------|---------------|---------------------------------|
| Dacorum                  | 1,016         | 1,355         | Submitted - March 2025 (old SM) |
| Hertsmere                | 731           | 1,034         | Evidence gathering              |
| St Albans                | 885           | 1,660         | Submitted - 29 November 2024    |
| Three Rivers             | 640           | 832           | Regulation 18 – August 2025     |
| Watford                  | 850           | 831           | Adopted – October 2022          |

- 3.1.3. St Albans are not obliged, under the Implementation measures under Annex 1 of the NPPF, to observe the new Standard Method requirement, but other authorities (including Hertsmere, Three Rivers, and Watford) will need to take account both of their own increased need as well as the unmet need in neighbouring authorities. The Economic Study, however, uses Labour Supply figures based on out-of-date housing requirements, and the Plan risks significantly underestimating the level of employment need within the FEMA as a result.
- 3.1.4. Additionally, the evidence base fails to account for suppressed demand i.e. the demand that would have arisen had the market not been constrained by insufficient levels of employment land coming forward. By not taking into account the scope for this suppressed demand, the approach taken by Hatch risks further underestimating 'true' market demand
- 3.1.5. The report does not give a requirement for office space on the basis that, in the years following Covid, demand has significantly reduced, but states that:

*To be clear, there is still expected to be demand for office space in the next few years but this is likely to be focused on smaller, high quality spaces in the FEMA's main office market (central Watford and St Albans).*

- 3.1.6. The Plan's economic strategy is therefore not based on a proportionate, justified, robust, and up-to-date evidence base which is concerning and means the Local Plan is not sound as drafted.

*Question 2 - Noting the Council's hearing statement for Matter 1, Issue 1, Question 5, should the Plan establish requirements for office, industrial and warehousing provision over the Plan period?*

- 3.1.7. The Plan does not set out employment requirements in either its broad strategy for growth or its more detailed employment policies which is disappointing. An assessment of an area's need over the Plan period, along with the quantum of supply, are two central strategic pillars required of a sound, positively prepared strategy. Without this figure, established by a robust evidence base, the Plan cannot be considered sound. Employment need figures should be provided within the Plan, and these should clearly identify the needs for office, industrial and warehousing. The approach taken by St Albans for industrial and warehousing provision is completely inadequate, relying on the supply potentially being delivered on two largescale sites to account for all of its potential need over the Plan period. This oversimplifies the plan making approach and clearly more robust evidence is required to establish the amount of need and market requirements for employment provision.

*Question 3 - Is the Plan positively prepared in respect of setting a strategy and identifying land to meet assessed employment needs?*

- 3.1.8. The Plan is not positively prepared in respect of setting a strategy, and does not identify land to meet the assessed employment need.
- 3.1.9. As set out in Policy SP5, the Plan's employment land supply consists of two strategic sites:
- 33.16ha at the former Radlett aerodrome – A Strategic Rail Freight Interchange (B8 distribution / warehousing); and
  - 53ha at East Hemel Hempstead (Central) - A range of uses including offices, research and development, light industrial and distribution.
- 3.1.10. Nowhere does the Plan set out anticipated delivery timeframes for these sites, and it is not clear when they are expected to come forward, and whether they will be built out in full within the Plan period.
- 3.1.11. The Former Radlett Aerodrome is not allocated within the Plan, but is within the identified supply as it benefits from an outline permission, allowed at appeal on 14 July 2014 for:

*Outline planning application (approval of means of access, siting and landscaping only) for the development of Strategic Rail Freight Interchange comprising intermodal area, distribution buildings (Class B8 use) and other related floorspace (Class B1/B2 use) up to 331,655 sqm with a maximum height of 20 metres together with associated road, rail and other infrastructure works including parking for up to 1602 cars and 617 lorries with earth mounding, tree planting and a new Park Street/Frogmore relief road. Includes additional landscape and other works on further sites to provide public access to open land and community forest.*

- 3.1.12. A set out in Hatch's Employment Study, 'this is a unique development in that it will comprise a small number of very large B8 distribution warehouses that are rail linked.' The site:

*[W]ill serve both national and regional markets. Therefore it could be argued that development at Radlett cannot be considered to be meeting the needs of the FEMA as it serves a far larger catchment area. We agree that Radlett will be meeting demand across a much larger geographical area than existing employment sites in South West Herts, and therefore it would be inappropriate to assume that the whole of the site could address the need in the preferred scenario.*

- 3.1.13. The site clearly serves a wider regional and national market, and based on this cannot be relied upon to contribute to need arising within St Albans or potentially Hertfordshire. For this reason it ought to be treated with extreme caution in so far as it relates to offering a meaningful contribution to the local employment land supply.

- 3.1.14. This site is therefore not considered to be capable of meeting local employment need, and ought not to be included as part of the supply of land servicing locally arising employment need.

- 3.1.15. The delivery of land for the purposes of meeting need arising within St Albans' is therefore concentrated on a single site at East Hemel Hempstead. If this site does not come forward as envisaged, St Albans will be unable not only to contribute to Dacorum's unmet need, but also to fulfil their own employment land requirements. This strategy lacks flexibility and contingency, and is not sound in this regard. The fact that this site exceeds the stated employment need (which as discussed above is unscientific and considered to underestimate need) will mean little if the site itself is not delivered.

- 3.1.16. Beyond the Plan's ability to deliver the quantitative need, attention should be made to the qualitative employment requirements. As set out in paragraph 5.6 of the Plan, St Albans has a high proportion of small businesses:

*Figures for 2022 [show] that out of 8,675 enterprises 91.4% were micro-businesses (employing up to 9 people), 7.1% were small businesses (employing 10 to 49 people), 1.2% were medium sized organisations (employing 50 – 49) and just 0.4% were large organisations (employing 250 plus).*

- 3.1.17. Strategic employment sites clearly make a vast contribution to economic growth, particularly for regional and nationally significant occupiers involved in supply chain logistics. However, this end of the market is less likely to deliver a sufficient range of premises to accommodate St Albans' smaller local businesses, for whose expansion and growth the Plan should be providing a suitable platform. Whilst Policy SP5 states that 10% of any new development or redevelopment on site is required to contain units for Small Medium Enterprises and expansion / Grow-On units, it is not clear whether this will meet in full St Albans qualitative needs. It is also not clear that the concentration of land in a single area accommodates occupier requirements across the wider district. An approach that spreads development more widely is considered to be more justified in this regard.

- 3.1.18. Within the allocation policy, development across the 53ha site is apportioned as follows:

- Approximately 17 ha of the site will promote high density, higher skilled employment uses to deliver a Business, Research and Development Park and explore opportunities for education; and
- Approximately 36 ha to the north of the site will promote uses such as logistics and mixed industrial areas.

3.1.19. These figures do not square with the Site Viability Report prepared by BNP Paribas, dated September 2024, and published as part of the Regulation 19 evidence base, which found the following capacity:

- Gross site: 58.40ha;
- Net site: 36.19ha;
- Industrial/logistics: 26.87ha; and
- Business/Research & Development Park: 9.32ha.

3.1.20. The allocation also states that ‘an overconcentration of low employment generating logistics uses will not be permitted.’

3.1.21. For the reasons stated above, the Radlett Aerodrome ought to be excluded from the local employment land supply, and East Hemel Hempstead (Central) is therefore the only allocated employment site in the local authority area. Placing restrictions on what kind of employment development will be permitted on the site (especially for logistics, which has an identified requirement of c.22ha in the evidence base, by far the highest figure) is not a justified strategy.

3.1.22. Beyond concerns about restricting use, 17ha of the site has been set aside for office, and research & development (although the Site Viability Report found this to be only 9.32ha). Ambitious planning for high density, high skilled employment uses is to be supported, but this will not contribute to meeting the identified need of c.28.7ha identified in the Hatch’s September 2024 Employment Study.

3.1.23. The site (and therefore the Plan as a whole) claims to put forward a supply of 36ha to meet the claimed requirement of 28.7ha for B2/B8 Class uses, however the draft Plan seeks to avoid an ‘overconcentration’ of low employment generating logistics uses.

3.1.24. Further complicating the picture is the fact that the very recently prepared Site Viability Report relating to the allocation found that there was only 26.87ha for industrial and logistics development. This suggests that, far from an oversupply of land, the Plan could be short of its own requirement by c.1.83ha.

3.1.25. This is not a positively prepared strategy, and does not identify land to meet the assessed employment need, in particular at the smaller and more local end of the market, the needs of which are very unlikely to be addressed by largescale strategic sites. The Plan should be strengthened by making provision for smaller sites including open storage as part of the B8 need. Both Smallford Works and Appspound Lane are ideally placed to support the Plan in this capacity, both of which constitute previously development land in the Green Belt.

*Question 4 - How did the Council identify land to allocate for employment uses? Was the site selection process robust, justified and proportionate?*

- 3.1.26. As set out above in response to Matter 3, Issue 1 Appspound Lane was not considered for allocation within the Plan, despite it being a previously developed land. In addition, Land at Smallford Works, which was promoted for employment land, was instead allocated for housing despite there being no prospect of this coming forward.
- 3.1.27. The site selection process was not robust, justified and proportionate, as evidenced by these oversights.

*Question 5 - How will the allocated sites at East Hemel Hempstead (Central) and the Radlett Strategic Rail Freight Interchange assist Dacorum and potentially other South West Hertfordshire authorities in meeting some of their employment needs? Is the policy effective?*

- 3.1.28. Strategic Policy SP5 states that the amount of land allocated exceeds the District's own needs, and that the excess will 'assist Dacorum Borough and potentially other South West Herts local authorities in meeting some of their employment requirements'. This is considered to be insufficiently vague – nowhere in either the policy or the supporting text is the relevant requirement and oversupply detailed. In the interest of an effective and positively prepared Plan, St Albans' full requirement should be stated, alongside the full quantum of allocated land. In the event that there is over-delivery earmarked for another authority, the quantum of this should be clearly stated. Currently, it is unclear how much land St Albans requires, how much is being provided to meet Dacorum's unmet need, and what may be available to meet unmet need elsewhere.

*Question 6 - The 2024 South West Hertfordshire Economic Study states that the main barriers to economic growth are the available labour market, with particular reference to an ageing population demographic. Taking this into account, are employment and housing requirements suitably aligned, and will the Plan provide sufficient labour to support the employment strategy?*

- 3.1.29. As set out above, housing delivery within the FEMA is expected to increase significantly in coming years owing to the revisions to the Standard Method for calculating housing need. The Plan does not provide enough employment land to support the anticipated growth in labour supply across the FEMA, and does not represent a sound strategy.

## 4. Matter 7 – Residential Site Allocations

### 4.1. Issue 10 – Colney Heath and Radlett Site Allocations, Policy P1 – Smallford Works, Colney Heath

*Question 1 - What is the existing use of the site and is it developable within the plan period?*

- 4.1.1. The existing use of the site is employment, and has been consistently promoted for employment use within previous consultations for the Local Plan. It is developable within the Plan period, as confirmed by the owners SBP on whose behalf this Statement is submitted. However, it will not be developed for residential, and there is no prospect of it forming part of the Plan's housing land supply. Clearly the Council's intention to allocate the site is positive, reflecting its status as an established employment location, however the site's current industrial uses should be reflected in an allocation for employment uses.

*Question 2 - What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?*

- 4.1.2. The site is previously developed land in the Green Belt, and is considered to constitute grey belt land. However, for soundness, the site ought properly to be removed from the Green Belt as part of an allocation for employment uses. As set out in both in this Hearing Statement and the one submitted to Stage 1, exceptional circumstances exist to alter Green Belt boundaries in St Albans, and the site should be removed from the Green Belt.

*Question 3 - Is Policy P1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?*

- 4.1.3. Smallford Works is allocated in the Regulation 19 draft, and SBP are strongly supportive of the site's allocation and its identification as a site capable of sustainably contributing to St Albans' identified needs. However, the capacity and the proposed use are not in line with either the site's potential or its capacity, and the details of the allocation need to be changed to reflect this.
- 4.1.4. The draft allocation puts the site forward for residential, with an indicative capacity of 58 dwellings. As set out in our Regulation 18 consultation response, the site is being promoted for employment use only and will not be coming forward for residential. The Regulation 19 draft was not changed to reflect this, which has implications not merely for the site, but also for the soundness of the Plan's housing strategy.
- 4.1.5. The fact that the site is also in active employment use means that, even if it were to come forward for residential development, there would be a loss of 3.34ha from the current stock of employment land. Considering the apparent narrowness of the Plan's supply when set against its requirements, this loss could also have implications relating to the sufficiency of the Plan's supply of employment land.

- 4.1.6. Beyond the nature of the allocated use, there is also a concern around the site's development capacity. The allocation gives an indicative capacity of 58 dwellings, which is 22 units fewer than the 80 dwellings suggested in the Regulation 18 draft of the Plan. This reduction has nothing to do with the site itself, or any perceived constraints. For reasons set out in our Regulation 19 representation, the reduction has been driven entirely by the Council lowering its housing supply in order to tally with its reduced housing requirement. The reduction of the site's capacity is inconsistent with national planning policy, which clearly seeks to make efficient use of land.
- 4.1.7. The reduction of the site's indicative capacity is strongly resisted, and the proposed residential use is not being pursued by SBP. The site is a brownfield employment site, and it would be a far more efficient use of land to allocate it for intensifying redevelopment to increase the quantum of employment uses on site. It is capable of sustainably accommodating significantly more development than the Plan's indicative capacity of 58 dwellings, and both the site's development capacity and allocated use ought to be changed in order to represent the best possible use of the site, and ensure that Plan's soundness.
- 4.1.8. In order to make the Plan sound the site should be removed from the Green Belt, allocated for employment uses rather than residential, and the Plan's housing strategy must be amended to ensure that it is capable of delivering a sufficient supply of housing without Smallford Works.

**Alex Cole**  
Director

+44 (0) 07773 669382  
[alex.cole@savills.com](mailto:alex.cole@savills.com)

**Henry Asson**  
Senior Planner

+44 (0) 07977 860379  
[henry.asson@savills.com](mailto:henry.asson@savills.com)