

**Examination of the St Albans City and District Local Plan
Matters, Issues and Questions for Stage 1**

Matter 2: Housing Growth and Spatial Strategy

**On behalf of Bloor Homes and the Department for Health
and Social Care.**

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The Hearing Statements on behalf of Bloor Homes and the Department of Health and Social Care are made without prejudice to the promotion of the Broad Location Hemel Hempstead North.

Our criticisms and objections to the Plan are not aimed at the allocations per se, but at the Council’s approach to housing provision (i.e. the inadequate provision given the latest standard method figure, the track record of housing delivery, the acute affordability issues and the Green Belt review).

As noted in SADC/ED13, the Sof CG was submitted without prejudice to other matters that parties wish to raise during the examination.

1. Matter 2 – Housing Growth and Spatial Strategy

Issue 1 – Local Housing Need

Q1. What is the plan period for the submitted St Albans Local Plan? Is this sufficiently clear to users of the Plan?

Paragraph 1.5 states that the plan period covers the period 1st October 2024 – 31st March 2041, some 16½ years. This is set out in Policy SP1 and SP3.

Paragraph 22 of the NPPF is clear that strategic policies should look ahead as a minimum 15 years post adoption to anticipate and respond to longer term requirements and opportunities. The Council assume that the plan will be adopted in 2026 and consequently the plan period does little more than provide the minimum plan period assuming that the plan is adopted next year.

Furthermore, in determining the plan period and preparing the Plan the Council have acknowledged the need to review the Green Belt, however, the plan does not accord with paragraph 145 of the NPPF, which states that:

“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so that they can endure beyond the plan period.” (my emphasis)

It is considered that the plan period should be extended and more sites included to ensure that the minimum housing is delivered. Unforeseen events will always unfold when it comes to delivering specific sites which cause delays and, in some instances, no delivery at all. We have to plan for the fact that not every allocated housing site will be delivered and therefore we have to overprovide in relation to the identification of housing land in local plans to provide any chance of delivering the required numbers and improving the accessibility of the housing market.

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?

The minimum number of new homes needed over the plan period based on the standard method that the Council have applied i.e. 885 dpa is 14,603 dwellings over the 16½ plan period.

The plan was submitted under the transition arrangements, and it should be noted that the latest standard method figure is 1,657 dpa.

If the plan proceeds to adoption, it is considered that a policy should be included to ensure an immediate review. This would follow the intention from NPPF (December 2024) paragraph 236, where a plan that has been submitted and if adopted and the housing requirement meets less than the 80% of the housing need, the LPA will be expected to bring work on a new plan, under the revised plan making system introduced by LURA 2023

We have suggested a modification in our Reg 19 representations i.e. the adopted Bedford Local Plan 2030 includes such a policy.

The PPG advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Circumstances may include situations where there are growth strategies for an area, where strategic infrastructure improvements are proposed or where an authority is taking on unmet housing needs from elsewhere.

Q3. Do any of these circumstances apply to St Albans?

In our representations to Policy SP1 we referred to paragraph 61 of the NPPF (December 2023) – the outcome of the standard method is an advisory starting point for establishing the housing requirement for the area. Both the NPPF and PPG are, therefore, clear that the LHN calculated via the standard method is the advisory minimum housing requirement for an area, it does not produce a housing requirement. Paragraph 61 refers to the fact that there may be exceptional circumstances which justify an alternative approach to assessing housing need.

The PPG Practice Guidance (PPG) provides guidance upon the interpretation of the NPPF. It currently sets a four-stage process to identifying the LHN for an area.

The current minimum local housing need for St Albans based on 2023 affordability ratios is 885 dwellings per annum (dpa), this equates to 14,603 dwellings over the plan period (1st October 2024 to 31st March 2041). In accordance with the NPPF, the 885dpa target should be met, as a minimum, in St Albans, unless exceptional circumstances dictate otherwise. The figure of 14,603 dwellings is as a result of the cap being applied.

As the Plan is examined under the December 2023 NPPF and the PPG it should be noted that the cap is not intended to be a permanent fixture of the LHN calculation as it is not considered a true reflection of the need within an area.

Removal of the cap significantly increases the housing need. In the case of SADC, the uncapped figure is 1,169 dwellings per annum (Table 5.2 South West Herts LHNA March 2024). This is 284dpa greater than the capped figure and in accordance with the PPG represents the true need as calculated via the standard method.

The PPG (2a-024) identifies that where an increase in the overall figure could help to meet affordable housing needs, consideration will need to be given to increasing the housing requirement.

Therefore, the LHN calculated using the standard method represents the minimum advisory starting point for identifying the housing requirement for St Albans providing this does not conflict with other policies within the NPPF.

The NPPF at paragraph 67 provides examples of circumstances where a housing requirement figure may be greater than the identified LHN. This includes, but is not limited to:

- provision for neighbouring areas,
- reflects growth ambitions linked to economic development, or
- infrastructure investment.

These examples are replicated and expanded upon within the PPG (ID: 2a-010-20201216). Other situations identified within the PPG include previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA). The PPG also notes (ID: 2a-024-20190220) that:

“...An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”

The PPG (ID: 2a-010-20201216 and 67-008-20190722) also identifies a non-exhaustive list of instances where the minimum requirement should be exceeded.

We have set out in our Reg 19 representations the circumstances we believe that justify a higher actual housing need figure than the standard method. For example, In terms of housing growth over the last few years St Albans has delivered an average of just 458 homes per year between 2018/19 and 2022/23. This is just 51.6% of the capped need identified by the

standard method and less than 43.0% of the uncapped need. Over the longer timeframe of 2001-02 to 2022/23, this falls to an average of 367 homes per annum. This is woefully below the minimum local housing need requirement of 885 dwellings per annum. This is evidenced by the results of the HDT.

Even the Councils LHNA concludes that there has been below average growth in SW Herts and over the period 2011-2021 housing affordability has deteriorated which has contributed to a decline in home ownership from 66% to 69%.

The LHNA (March 2024) found that affordable housing need in SADC is the highest in the SW Herts area (Table 1.2) LHNA at 802 dwellings per annum. The PPG states that

“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.” Paragraph: 024 Reference ID: 2a-024-20190220.

Delivery of affordable housing has not met the target.

In summary, to meet the housing needs of the local population and ensure housing is affordable to more households within St Albans, more homes need to be delivered above the annual housing target of 885 dpa. An increase above the capped method would not only be consistent with national policy and guidance but would also assist in remedying the acute issues of affordability, affordable housing need, ageing population and economic growth with St Albans. The delivery of 885 dpa over the 16.5-year plan period would deliver a total of 14,603 dwellings. The uncapped figure of 1,169dpa over the 16.5 years would deliver a total of 19,289 dwellings. However, the direction of travel in terms of the new standard method (updated with the affordability ratio March 2025) would require the delivery of 1,657 dpa and would deliver 27,340 dwellings over the plan period, which is an additional 12,737 dwellings over what is currently proposed.

As proposed the Plan fails to address the Council's own District Plan 2024-2029 priorities which include the delivery of more social housing and supporting the local economy.

Based on the NPPF 2023 the true scale of need identified is 1,169 dwellings per annum (with the cap removed) and the new standard method calculation increasing the minimum housing need to 1,657 dwellings per annum, and provision of significant new employment space; it is considered that it is incumbent upon the Council to consider if a further increase above the

capped requirement to address local or sub-regional issues, including issues such as affordability and the ageing nature of the population and meeting some of the unmet need from neighbouring authorities. It is therefore not unreasonable that the housing target in St Albans should be more in line with the standard method figure of 1,657 dpa.

Issue 2 – The Housing Requirement

- Q1. **What is the justification for a) the level of housing proposed in the first 5 years post adoption, and b) the significant uplift from 485 to 1,255 dwellings per annum thereafter? Are the figures justified?**

This is a matter for the Council to explain, the Plan [LPCD 02.01] at paragraph 3.27 states that *“housing trajectory is stepped in order to allow sufficient time for the significantly uplift in housing delivery to be realistically achieved.”*

The PPG Housing Supply provides guidance on a stepped trajectory and when it is appropriate, **Paragraph: 021 Reference ID: 68-021-20190722**

Given the Council’s record of housing completions over the last 20 years as referred to in our Reg 19 reps, it is not clear how the Council envisage that the delivery will increase even to the depressed figure of 485 dwellings per annum in the stepped trajectory. This figure is below the housing requirement proposed in the plan of 885 dwellings per annum and significantly below the current standard method of 1,657 dpa.

Given that delivery of housing over the recent and the distant past has been significantly below the capped requirement set by the LHN standard method (885dpa) there is a clear need to provide a range and choice of sites to meet needs as the over reliance on strategic sites will result in less needs being met as explained in our Reg 19 representations. There is a concern that the use of a stepped trajectory should not seek to unnecessarily delay meeting identified development needs.

The SA [LPCD 03.01] paragraph 9.10.1 states:

A stepped requirement is not supported from a pure ‘housing’ perspective, because providing for housing needs is an immediate priority (e.g. given a very high affordability ratio and very high need for affordable housing). However, there is a clear case for a stepped requirement given reliance on HGC and limited realistic small site options, particularly on the basis of the

evidence provided by the HELAA, Green Belt Review and the Urban Capacity Study.”

The Council’s approach is not boosting housing supply in line with the NPPF and in recognition of the housing crisis.

In order to avoid a stepped trajectory, it is necessary to allocate more sites below the threshold of 250 dwellings to ensure delivery. This would assist in meeting housing needs including much needed affordable housing. (The median affordability ratio in St Albans is currently 15.55 (as of 2024), above the ratio in the East of England (9.07) and the whole of England (7.71), as well as being significantly above the 4–4.5 salary to house price ratio that mortgage providers will typically lend.)

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?

It is noted in SADCED34 in paragraph 13.5 that the relatively low housing requirement in years 1 – 5 corresponds with the relatively lower level of housing supply in this period

The supply in years 1–5 (post adoption) is sourced primarily from existing planning permissions (annual average of 198 net dwellings per annum including –8% lapse assumption) and the annual windfall allowance of 145 net dwellings per annum. In addition, some of the small to medium sized site allocations and Hemel Garden Communities site allocations are estimated to be delivered in years 4–5 (post adoption) from 2029/30 to 2030/31.

The PPG provides guidance that:

Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs.

Paragraph: 012 Reference ID: 68–021–20190722

The issue is, given the absence of an up-to-date Local Plan since 1994, the poor delivery record of housing completions as evidence in the HDT and the significant need for affordable housing as evidence in our Reg 19 representations and referred to above, that the Plan by including a stepped housing trajectory does not address these issues, this even more evident when the standard method has doubled to 1,657 dpa and the Council have sort to avoid addressing this issue by bringing forward the submission of the Plan from March 2025 to November 2024.

In our view if the Plan is to proceed it should include a greater range and choice of dwellings through amendments to the Green Belt boundary, enabling the allocation of smaller sites to start to deliver earlier in the plan period and therefore seek to address the issues above.

Q3. Is the housing requirement intended to be found in Policy SP1 or SP3?

This is a matter for the Council, but in our view the housing requirement should be found in Policy SP1 and prefaced with the words “at least”. Paragraph 16 of the NPPF indicates that unnecessary repetition should be avoided.

Issue 3 – Settlement Hierarchy

Q1. What is the justification for this approach given the period of time which has elapsed? Does the assessment adequately reflect the form, role and function of existing settlements in the area?

It is considered that the Council’s approach fails to acknowledge that settlements do not “neatly” fall into categories and over time additional development has taken place. The settlement strategy should have regard not only to existing built form but also committed development. Harperbury Park on the site of the former Harperbury Hospital is a typical example, where over time development has taken place, but this has not been taken into account when considering future sustainable development opportunities and again as mentioned in Matter 3 in respect of the Green Belt review sites were only considered if they fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site which is entirely or partially within the settlement buffer). It is not clear why a buffer was not defined around Harperbury Hospital/Haper Green as a settlement.

Consequently, sites that are not adjacent to existing urban areas or the buffers (i.e., those that fell beyond the 250m and 400m buffers were excluded).

The introduction of the concept of buffers around existing settlements has precluded the consideration of other promoted sites.

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

No comment.

- 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?**

No comment.

Issue 4 – Distribution of Housing Growth

- Q1. How does the distribution of housing growth compare with the settlement hierarchy over the plan period, taking into account completions, commitments and sites identified in the Local Plan? Does the spatial strategy reflect the size, role and function of settlements in Policy SP1?**

No comment.

- Q2. What is the justification for referring to sites over 250 dwellings as ‘broad locations’ when they are identified in Part B of the Plan? Is this approach sufficiently clear to users of the Plan and is it effective?**

Policy LG1 as drafted is misleading, the broad locations are in effect strategic sites and as such the Plan should include a policy for each of the strategic sites in order to provide clarity for developers and local communities etc in terms of what is proposed and expected in terms of contributions for each of the proposed sites.

In order for the plan to be positively prepared (paragraph 16 of the NPPF and paragraph 35 to be effective and therefore sound), policies need to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

- Q3. How does the distribution of sites by size reflect the settlement hierarchy? For example, are all the ‘broad locations’ within Tiers 1–3?**

No comment.

- 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?**

No comment.

- Q5. How did the classification of land as Green Belt and the availability of land within the urban area determine the spatial strategy and distribution of housing growth?**

No comment.

Issue 5 – Site Selection Methodology

Q1. What were the reasons for discounting sites at the initial assessment stage? Was this done on a consistent and transparent basis?

The methodology used to assess sites for possible allocation in the Local Plan is set out in the Local Plan Site Selection Proforma Methodology Paper [LPSS 02.02].

Our main concern as set out in our Reg 19 representations to the SA and in particular the SA Section 5.3 Site Options is that in the SA process there is no audit trail of all the reasonable alternative site options considered and the Council's reasons for either including or excluding the sites. In other SAs for other Local Plans, sites have been appraised against the SA objectives so that a comparison can be made.

It is not clear which sites from the HELAA assessment have been carried forward into the SA and which sites form the options in the sub areas. There is no SA of individual sites so that they can be compared. Instead, the HELAA is the starting point as stated in paragraph 5.3.3 of the SA.

Q2. Were all sites beyond the 'buffers' discounted at this stage? Is this a justified and effective approach to site selection?

The Green Belt Review Level 2 2023 [GB 02.02], states that there is no specific guidance regarding the appropriate buffers to adopt. Two buffer scales were used. The 2023 assessment introduces 250m and 450m buffer zones around select settlements within the district. As stated in our response to Matter 3 the methodology of the Stage 2 assessment only considers parcels of land within or adjacent to these buffer zones, with all other sites being knocked out of contention and not considered in detail.

The supporting evidence to the Regulation 19 consultation, including the Site Selection Methodology, Outcomes and Site Allocations Report (LPSS 01.01), outlines the Council's justification provided for the introduction of GBR (Green Belt Review) buffers around settlements.

However, the use of buffers has resulted in, Green Belt sites identified in the HELAA, but outside of the GB buffers not being considered to be suitable due to their *"less sustainable"*

location and because development on such sites would create holes in the Green Belt, leading to fragmentation”.

As the SA is an integral part of plan preparation, the process needs to be transparent in order for the plan to be justified and found sound as set out in paragraph 35 of the NPPF (2023).

Our objection to the Site Options is that the SA has failed to consider the options for Harper Green, despite submissions which clearly explained the sustainable location and the sites deliverability.

The GB assessment has been constrained by what appears to be arbitrary buffers, this has resulted in only those sub-areas that fell entirely or partially within the settlement buffer, or immediately adjacent to other areas /sites entirely or partially within the settlement buffer being taken forward. This is addressed in Matter 3.

Q3. What was the justification for using distances when determining accessibility? How were other factors taken into account such as the ability to access services and facilities by walking, cycling and public transport?

This is a matter for the Council.

Q4. As part of this process, how did the Council consider the necessary infrastructure requirements of proposed sites, such as the need for highway improvement works or new and improved services, such as education and health?

This is a matter for the Council.

Q5. How did the Council consider the viability and deliverability of sites, especially where new or upgraded strategic infrastructure is required?

No comments.

Q6. What was the justification for this approach, and why did it differ from potentially sustainable development proposals in other Tiers of the hierarchy?

No comments.

Q7. Following the completion of the proformas, how did the Council decide which sites to allocate?

This is a matter for the Council.

Q8. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?



We submitted detailed representations to the Reg 19 consultation on the Site Options and Site Selection which are not repeated here but suffice to say that we do not consider that the site selection process was robust for the reasons set out in our submission.

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Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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