

# **St Albans New Local Plan 2041**

## **Examination in Public**

### **Matter 2 – Housing Growth and Spatial Strategy**

Land North of Sandridge

On behalf of Longbourn Estates

Date: April 2025 | Pegasus Ref: LON.0649\_R001v1

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## Document Management.

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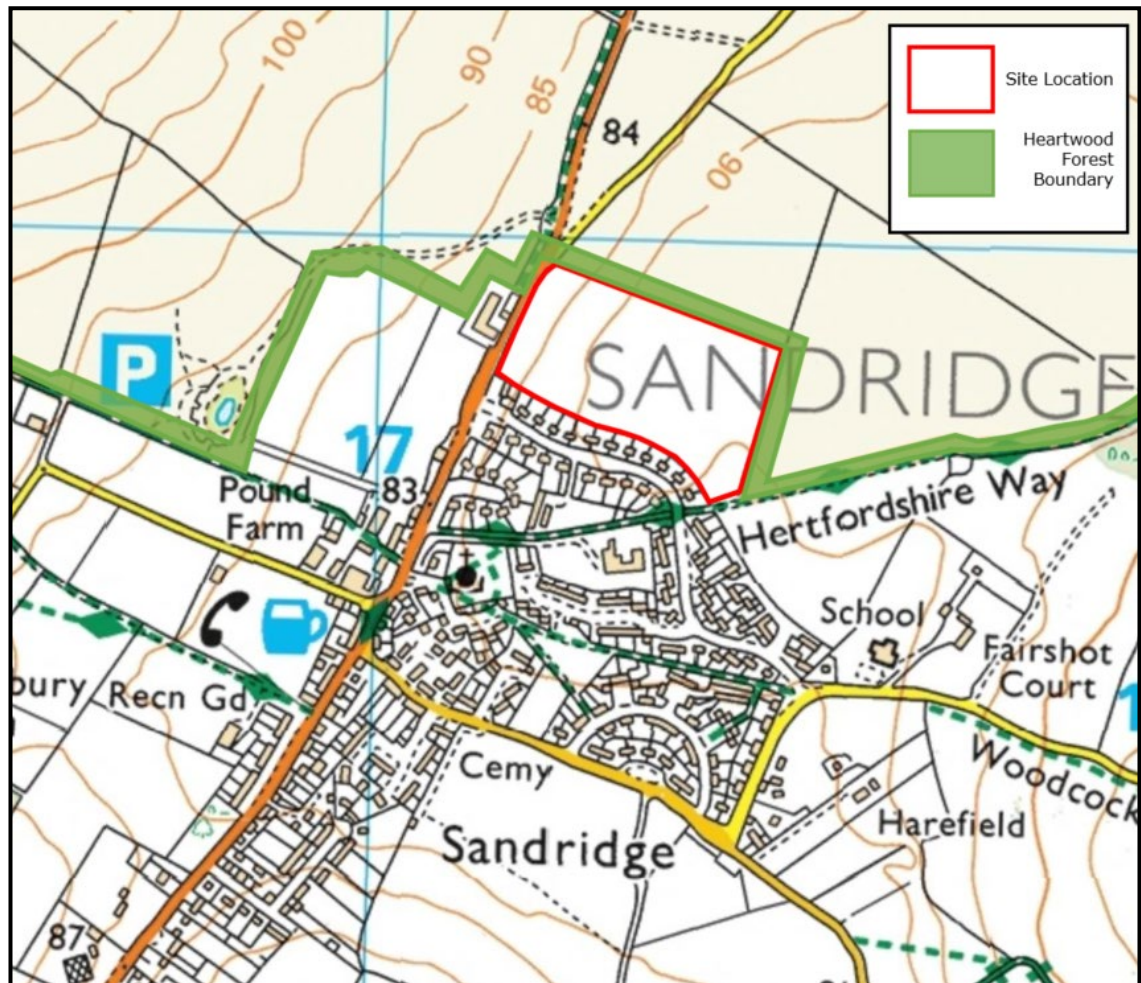
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# 1. Introduction

- 1.1. This Hearing Statement has been prepared by Pegasus Group on behalf of Longbourn Estates, the freehold owner of Land North of Sandridge, reference SAN-09-21 (HELAA, 2021), as highlighted in Figure 1 below.

**Figure 1: Land North of Sandridge (SAN-09-21)**



- 1.2. This Hearing Statement is prepared pursuant to the 'Matters, Issues and Questions for Stage 1' raised by the appointed Local Plan Inspectors, and specifically in response to **Matter 2 – Housing Growth and Spatial Strategy**.
- 1.3. This Hearing Statement should be read alongside our representations to the St Albans City & District Council (SADC) Regulation 18 & 19 Draft Local Plan 2041 (September 2023 & 2024 respectively).
- 1.4. Land north of Sandridge is deliverable (suitable, available and viable) within the early part of the new Local Plan period (i.e. years 2024–2029) and offers the opportunity to deliver a high-quality development of up to 150 new homes to contribute towards the District's significant housing needs for all sections of the community, including the provision of market housing, affordable housing, adaptable and older persons housing.

## 2. 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.**

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

- 2.1. The plan period is considered to be sufficiently clear, being stated within both Policy SP1 (A Spatial Strategy for St Albans District) and Policy SP3 (Land and the Green Belt), as running from 1<sup>st</sup> October 2024 – 31<sup>st</sup> March 2041.
- 2.2. However, for monitoring purposes it would be clearer for the plan period to run from 1<sup>st</sup> April 2024 – 31<sup>st</sup> March 2041.

**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?**

- 2.3. Policy SP1 correctly applies the 2023 standard methodology for calculating local housing need to identify that the minimum number of homes needed in SADC is 885 dwellings per annum (dpa), equating to 14,603 net new homes over the stated plan period 1<sup>st</sup> October 2024 – 31<sup>st</sup> March 2041. However, as highlighted above, it is unclear why the plan period starts half-way through the first monitoring year and accordingly it is considered sensible for the plan period to run from 1<sup>st</sup> April 2024 – 31<sup>st</sup> March 2041, equating to a minimum of 15,045 net new homes (i.e. an increase of 443 homes) over the plan period.

**15. 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?**

- 2.4. Paragraph 62 of the National Planning Policy Framework (NPPF, December 2024) requires Local Planning Authorities (LPAs) to take into account housing needs that cannot be met in other areas within a Housing Market Area when establishing the number of homes to be planned for. Whilst Dacorum are now planning to meet their needs in full, there remains

uncertainty with regards to the commitment of Hertsmere and Three Rivers to meet their needs in full also.

- 2.5. In addition, SADC is experiencing some of the worst housing affordability ratios of anywhere in the country, with house prices in the district now 15.6 times average salary<sup>1</sup>. Moreover, it must be noted that significant numbers of new homes will be needed to support new jobs and economic growth in the district, particularly in light of the dominant long-term trends in the growth of less economically active residents aged 65+ years.
- 2.6. Failure to plan for sufficient homes will only worsen the already extreme affordability ratios in the district and will hold back economic growth and SADC should look positively towards meeting housing requirements. Indeed, the 2024 standard methodology indicates an effective doubling in housing requirement of 1,660 net new homes for SADC, which as a minimum supports the need for an early or immediate review of the Local Plan to reflect the material change in housing need in the district resulting from the NPPF (2024).
- 2.7. Please refer to our Regulation 19 representations for further information.

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<sup>1</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/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.**

**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?**

- 2.9. The proposed stepped trajectory is not considered to be justified.
- 2.10. There is an accepted and significant need for new homes and the Local Plan currently under-plans for delivery in the first five years of the plan (2024–2029) by some 1,934 homes in the stated plan period. This is a significant shortfall.
- 2.11. It is clear that the Local Plan should seek to allocate additional sites which are capable of delivery in the early part of the Plan to contribute towards meeting housing needs when they are most needed, i.e. now.

**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?**

- 2.12. If a stepped housing requirement is considered to be sound, then this should be clearly stated in the policy text to ensure effective monitoring of housing delivery against requirements.
- 2.13. Moreover, alongside the stepped requirement, at all stages of the plan, it may be appropriate to include provision for suitable and sustainable 'safeguarded sites' to come forward to address housing needs where the plan is evidently failing to meet stated requirements/objectives.

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

- 2.14. For SADC to answer.

## 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.**

**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?**

- 2.15. For SADC to answer, however it is considered reasonable that the Local Plan be based on the situation on the ground as of the base date 2024, not 1994.

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

- 2.16. A key absence from the settlement hierarchy methodology would appear to be the 'proximity' of available services beyond the settlement boundary in question.
- 2.17. As highlighted in the Settlement Hierarchy Part 1 (2023), Sandridge village benefits from sustainable modes of transport in the form of local bus provision and cycle route connections but is afforded relatively low scores despite the ability to connect to the sustainable travel routes and services available within St Albans City nearby. Sandridge village is in fact a continuous extension of St Albans built-form and is located closer to St Albans city centre and railway station than some areas within the St Albans settlement boundary itself. It would appear reasonable to consider distance/travel time/mode of travel to key services and facilities beyond the immediate settlement in assessing the sustainability and ranking of settlements.

**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?**

- 2.18. The Settlement Hierarchy identifies Sandridge as falling within a 6<sup>th</sup> Tier (out of 7) settlement within the hierarchy, being one of the district's 'Green Belt Settlements'. However, Sandridge is well served by a range of shops, community facilities (e.g. village hall and playing fields), retail and employment space, public houses and Primary School and public transport services, not all of which have been considered in the methodology of the Settlement Hierarchy Part 1 (2023). Sandridge is therefore considered to be more comparable to the district's 5<sup>th</sup> Tier settlements (Medium Sized Villages), than to the other 'Green Belt Settlements' which generally offer very little by way of public services and facilities. Moreover, the proximity of St Albans city centre and accessibility to this key destination by sustainable modes of travel is a significant factor contributing towards the sustainability of Sandridge as a suitable location to support growth.





2.19. Please refer to our Regulation 19 representations for further information.

## Issue 4 – Distribution of Housing Growth

**18. Policy SP1 states that the Settlement Hierarchy provides the basis for the allocation and location of growth, locating most growth generally within and adjacent to the larger and most sustainable urban centres in Tiers 1–3 (St Albans and Hemel Hempstead, Harpenden and London Colney).**

**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?**

2.20. For SADC to answer.

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

**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?**

2.21. For SADC to answer.

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

2.22. For the Council to answer.

**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?**

2.23. Local Plan paragraph 3.6 references the need for plans to identify land to accommodate at least 10% of housing requirement on sites no larger than one hectare, equating to c.1,460 homes. However, there is no further specific acknowledgement within the Plan or evidence base and it is therefore considered that further interrogation is required to ensure this requirement has been met and if not, whether additional suitable sites should be included within the Plan to make up the shortfall.

**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?**

2.24. For SADC to answer.

## Issue 5 – Site Selection Methodology

**20. The Local Plan Site Selection – Proforma Methodology Paper (September 2024) (LPSS 02.02) describes the process used by the Council to allocate sites in the Plan. The starting point is the Housing and Economic Land Availability Assessment ('HELAA'). The Methodology Paper states that out of 678 housing sites, the HELAA identified 566 sites to progress to the next stage.**

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

- 2.25. The Housing & Economic Land Availability Assessment (2021) clearly identifies Land North of Sandridge (SA-09-21) as being potentially suitable, available and achievable, subject to further assessment as part of the site selection process.
- 2.26. However, the site is not considered further through the site selection methodology presumably because the site falls outside the Green Belt buffers applied the Green Belt review, however no such explanation is formally provided and therefore requires further interrogation.

**21. The Methodology Paper then states that “a more spatially focussed piece of work” was carried out by applying a buffer around each settlement inset from the Green Belt to assist in “encouraging a sustainable pattern of development”.**

**Q2: Were all sites beyond the ‘buffers’ discounted at this stage? Is this a justified and effective approach to site selection?**

- 2.27. The Green Belt Review (2023) simply states “*it was agreed that the character of the urban settlements and the approach for a finer grain assessment leant itself to a 400m buffer for the main settlements while a 250m buffer was considered reasonable buffer for lower order settlements*”. The Green Belt Review (2023) provides no further justification for the inclusion of these Green Belt buffers, nor the omission of the application of the 250m buffer around all lower order settlements, given this was the stated methodology.
- 2.28. The arbitrary use of buffers ignores genuine considerations such as landscape capacity; potential Green Belt impacts; and accessibility/sustainability credentials entirely. Moreover, no evidence has been provided to support the Council’s assertion that sites beyond the buffer would not contribute towards sustainable patterns of development. It is feasible that sites in sustainable locations and which are demonstrably capable of development with minimal harm to the Green Belt have been discounted at an early stage without thorough investigation. Sites such as Land North of Sandridge (SAN-09-21) have evidently been quickly filtered out of the site selection process without due consideration of the sustainability credentials of Sandridge village and the ability of the site to deliver sustainable development which would benefit the future vitality and viability of village services.
- 2.29. Please refer to our Regulation 19 representations for further information.

**22. Proformas were then used to analyse each site against a “sustainable development potential”, taking into account the Green Belt Study and major policy and environmental constraints. Accessibility was determined by measuring distances to key infrastructure and services.**

**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?**

2.30. The justification for using distances when determining accessibility to key infrastructure and services is unclear and evidently a more appropriate assessment for some indicators, such as accessibility to nearest mainline rail station, schools, local and employment centres, could have been travel time via sustainable modes of travel, to provide a more accurate picture of the sustainability of individual sites.

**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?**

2.31. For SADC to answer.

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

2.32. For SADC to answer.

**23. The Methodology Paper highlights that some sites that were not recommended for further consideration by the Green Belt Stage 2 assessment were still recommended to progress by the proformas. Reasons included their location next to a Tier 1 or Tier 2 settlement and potential to deliver sustainable development.**

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

2.33. For SADC to answer.

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

2.34. For SADC to answer.

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

2.35. Whilst Longbourn supports the Council’s site allocations identified, it is clear that the scale of housing need; the ability of sites to deliver quickly and the deficiencies in the assessment methodology undertaken supports the need for additional sites to be selected where there

is low Green Belt harm, or where landscape characteristics permit proportionate development in sustainable locations.

- 2.36. The use of an arbitrary Green Belt buffer around settlements has not been justified. The application of Green Belt buffers around settlements has not been applied consistently throughout the district, which has prevented a reasonable assessment of potential alternative sites. As a minimum, the Green Belt buffers of 250m should be applied consistently for all settlements of a lower order below the higher tier settlements (St Albans & Harpenden) where a 400m buffer is applied, or better still removed entirely in order that all sites can be appropriately assessed.
- 2.37. The assessment applied by SADC focuses development towards the higher tier settlements at the expense of settlements of a reported lower order, limiting the ability of the villages to grow sustainably. Such an approach could harm the continued vitality and viability of local services within the district's villages. It is considered that appropriate and sustainable omission sites should be further assessed and included to address local housing need in the early part of the plan; to assist in flattening/reducing the 'stepped approach' to housing delivery; and contribute towards sustainable patterns of development to the benefit of all settlements in the district.
- 2.38. Please refer to our Regulation 19 representations for further evidence regarding the deliverability and sustainability credentials of Land North of Sandridge.

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

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