

St Albans New Local Plan 2041

Examination in Public

Stage 2 Hearing Statement: Matters 1, 2 & 3

Land North of Sandridge

On behalf of Longbourn Estates

Date: September 2025 | Pegasus Ref: LON.0649_R003v1



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	26.09.2025	PA	PA	



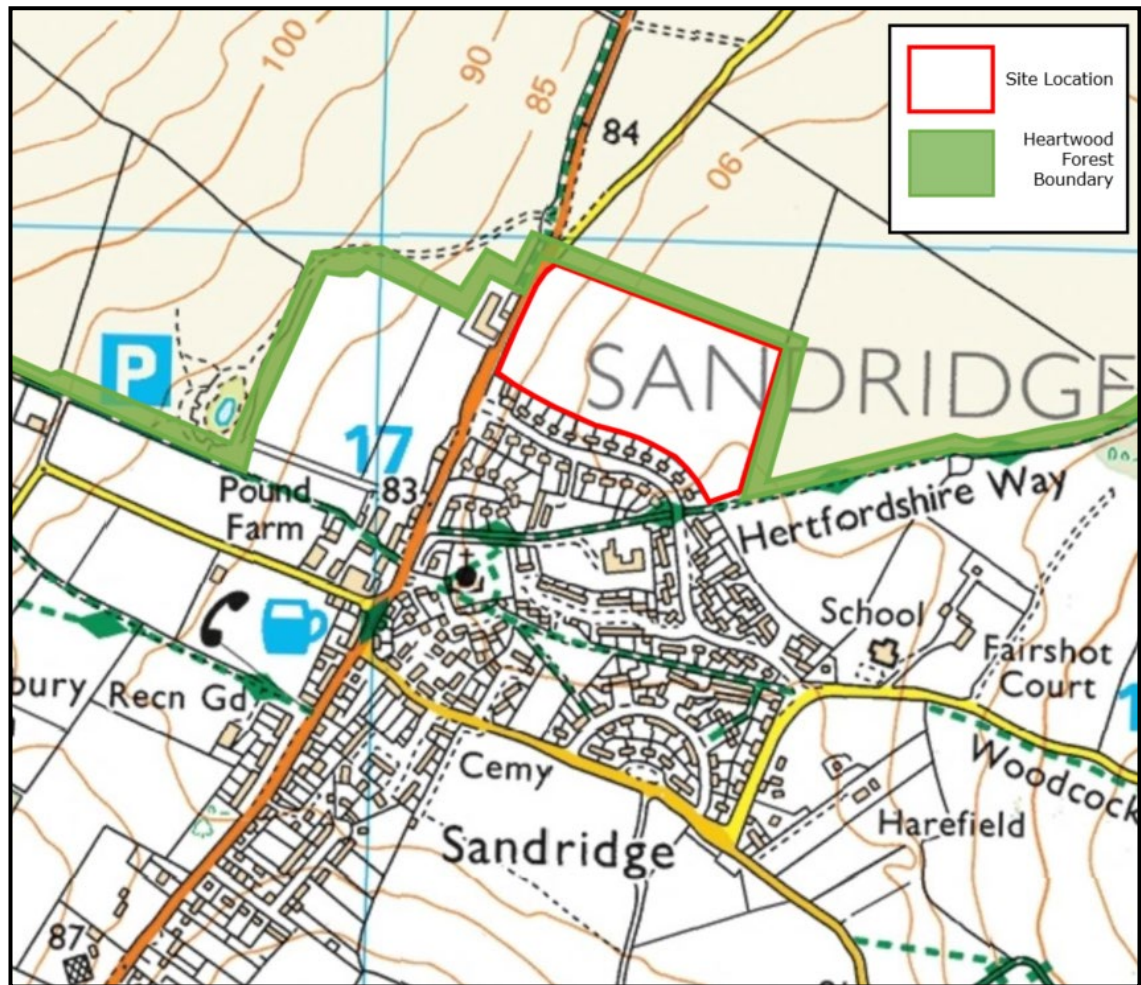
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1. Introduction

- 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 Stage 2 'Matters, Issues and Questions for Stage 1' raised by the appointed Local Plan Inspectors, and specifically in response to **Matter 1 (Legal Compliance)**, **Matter 2 (Housing Growth and the Spatial Strategy)** and **Matter 3 (The Green Belt)**.
- 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); and our submissions to the Stage 1 Hearing Sessions.
- 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 1 – Legal Compliance

Issue 2 – Strategic Flood Risk Assessment

2. At the Stage 1 hearings, the Council committed to providing further clarity regarding site allocations and flooding. The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) reassesses sites subject to flooding. In summary, it proposes the deletion and/or modification of 9 allocated sites.

Q3 Subject to the suggested changes, is the Plan consistent with national planning policy insofar as flood risk avoidance and mitigation is concerned?

- 2.1. Longbourn Estates makes no comments in respect of the soundness of the plan, only to note the conclusions of the Flood Risk Addendum (FRA, July 2025)¹.
- 2.2. The approach to flood risk taken by the FRA and as endorsed by St Albans City & District Council (SADC) would lead to the potential reduction of 41 homes from the relevant sites identified.
- 2.3. As part of our Stage 1 Hearing Statements, we identified an accepted and significant need for new homes in the first five years of the new Local Plan. The above only adds to the identified deficit and supports the need for the Local Plan to 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.

¹ SADC/ED77

3. Matter 2 – Housing Growth and the Spatial Strategy

Issue 1 – Housing Requirement

Following discussions at the Stage 1 hearing sessions, the Council accepted that the annual housing requirement should be applied across the full plan period from April 2024 to March 2041. It was also accepted that a recalibration of the stepped housing requirement was needed to reflect the most up-to-date position on predicted housing delivery and the forward trajectory.

Q1 How should the minimum housing requirement be reflected in the Plan to address these soundness matters? Is there a need for the housing requirement to feature in Policies SP1 and SP3?

- 3.1. This is primarily a matter for SADC to explain, however as highlighted in our submissions the proposed stepped trajectory is not considered to be justified.
- 3.2. 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 and the use of the stepped trajectory does not align with the National Planning Policy Frameworks (NPPF) objective of significantly boosting the supply of homes.
- 3.3. 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.
- 3.4. If however, 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.
- 3.5. 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.

4. Matter 3 – The Green Belt

Issue 1 – Green Belt Review

8. The application of some Green Belt policies (such as Policy LG8) rely on the Council's proposed boundaries to Green Belt settlements as shown on the policies map.

Q4 What is the justification for defining boundaries for those settlements that remain washed over by the Green Belt? Are the boundaries justified and effective?

- 4.1. The Inspectors are directed to our previous representations, firstly, challenging the use of an arbitrary Green Belt buffer around settlements; and secondly, challenging the justification for the washing over by Green Belt of the village of Sandridge and that the village should in fact be inset from the Green Belt.
- 4.2. The Green Belt Assessment ignores the context of the extensive planting associated with Heartwood Forest, which effectively maintains the physical and permanent Green Belt boundary to the north of the village. Longbourn Estates consider that the forest acts as a natural edge to the village, which allows for consideration as to the appropriate boundary of the settlement.
- 4.3. If inset from the Green Belt, Land North of Sandridge would represent a natural and logical boundary to the village. The forest serves many of the purposes of the Green Belt, by checking the unrestricted sprawl of the village; preventing coalescence; and safeguarding further countryside from encroachment, whilst seizing all appropriate opportunities to significantly boost the supply of housing, particularly bringing forward sites which are capable of delivering within the early part of the plan period.
- 4.4. This is especially important in the context of Matter 6 (Hemel Garden Communities) and Matter 7 (Residential Site Allocations) in which the Inspector's raise reasonable questions concerning the deliverability of sites proposed for allocation on grounds of environmental, heritage, physical/technical, policy and infrastructure constraints. It can be anticipated that to some extent some proposed allocations will fail these tests and/or the quantum of development anticipated will be reduced; and even if allocated without amendment, experience tells us that some allocations will still simply fail to come forward in the timeframe envisaged or at all. It is therefore vital that the Local Plan seeks to overprovide housing land in order to ensure flexibility in the market and to deliver the number of homes required to address identified local needs.
- 4.5. Accordingly, please refer to our previous submissions 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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