
Examination of the St Albans City and District Local Plan

Matter 2 – Housing Growth and Spatial Strategy

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Contents

1.	Introduction	1
2.	Issue 1 – Local Housing Need	2
3.	Issue 2 – The Housing Requirement	3
4.	Issue 3 – Settlement Hierarchy	4
5.	Issue 4 – Distribution of Housing Growth	5
6.	Issue 5 – Site Selection Methodology	6

1. Introduction

- 1.1. This examination hearing statement has been prepared by Savills on behalf of Richborough.
- 1.2. Richborough is one of the UK's leading independent land promoters. Richborough use their land, planning and commercial expertise to identify sites and secure planning permission on behalf of landowners, delivering buildable schemes in the most efficient manner.
- 1.3. Richborough has entered into a promotion agreement with landowners Pennard Bare Trust and Ulvir Limited, who control part of the proposed allocation reference: B3 - West Redbourn, Redbourn, AL3 7HZ. The area of land controlled is c.12.1 hectares and has at times been referred to as Land West of Tassell Hall, Redbourn.
- 1.4. This response is also on behalf of Richard Blair in respect of his land north of Flamsteadbury Lane which also forms part of the West Redbourn allocation.
- 1.5. Richborough provided a response to the Regulation 19 consultation on the Local Plan, which is examination document reference: SADC/ED60.
- 1.6. Richborough have entered into a statement of common ground with St Albans City and District Council, which is examination document reference: SADC/ED26. Among other matters this statement of common ground states that the Council and Richborough generally support what is set out in the Local Plan Part A and what is set out in the Local Plan Part B, including the Key Development Requirements for Site B3.
- 1.7. This examination hearing statement responds only to the questions considered relevant to Richborough's land interest within the Matters, Issues and Questions for Stage 1, which is examination document reference: SADC/ED69.
- 1.8. In this response just the questions set by the Inspectors are reproduced in bold text and the response on behalf of Richborough is in unbold text.
- 1.9. It is acknowledged that examination matter 2 will consider strategic issues relating to housing needs and the housing requirement, distribution of growth and the methodology used to allocate sites for residential development. The appropriateness of individual site allocations will be discussed at separate hearings in Stage 2.

2. 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?

- 2.1. Paragraph 1.5 in the submitted Local Plan (examination document reference: LPCD 02.01) states the following:
- “This Plan contains all the planning policies and proposals for the future growth of the City and District of St Albans. It covers the period 1 October 2024 to 31 March 2041. The current Plan is the District Local Plan Review 1994 which will be superseded by the new Local Plan.”
- 2.2. Strategic Policy SP1: A Spatial Strategy for St Albans District, mentions that the Spatial Strategy positively plans for the future to ensure that by 2041 St Albans District is a great place to live, work and visit.
- 2.3. Richborough consider that there should be consistency in the plan period and housing requirements over the plan period. Paragraph 16 of the NPPF states that plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.
- 2.4. Starting the plan halfway through 2024, whilst not unsound, could be confusing and hence it would be helpful to understand why the Council has chosen to start the plan halfway through the 2024/25 period.

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?

- 2.5. Using the standard methodology the minimum number of homes needed in St Albans is 885 dwellings per annum, resulting in a total need of 14,603 homes.

Q3 Do any of these circumstances apply to St Albans?

- 2.6. Richborough consider that it is necessary for the Council to consider whether it can take any unmet needs from adjoining local authority areas.
- 2.7. We acknowledge there is uncertainty as to whether there will be unmet needs within the Housing Market Area, but there are identified unmet needs in London that the Council could have acknowledged and potentially reduced through an increase in the number of homes being delivered.

3. 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?

- 3.1. Richborough question whether the stepped housing requirement should be so low in the first five years of the local plan.
- 3.2. It is recognised that supply has been restricted in recent years and that in order to increase supply the Council needs to amend Green Belt boundaries. Delivery in the first 5 years of the local plan is expected to be 2,491 homes, just over half of the 4,425 homes that are required by the NPPF over that period. These are significant shortfalls, and therefore it could be possible to look at more supply earlier in the Local Plan period. If the Standard Method is applied evenly over the first 5 years, it would only just be possible to demonstrate sufficient housing land supply if the stepped trajectory of 485 dwellings per annum were to be used i.e. $485 \times 5 = 2,425$ dwellings.

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?

- 3.3. Richborough consider that if the use of a stepped requirement is considered to be sound it must be set out in policy.

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

- 3.4. We consider this is more a matter for the Council. NPPF paragraph 16 states that plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

4. Issue 3 – Settlement Hierarchy

- 4.1. Richborough have no comments to make in response to questions 1, 2 and 3.

5. 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?

5.1. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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?

5.2. This is also one for the Council to comment on. Richborough would be content for the description to change to identify the land areas as allocations for development.

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

5.3. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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?

5.4. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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?

5.5. This is one for the Council to comment on. Richborough do not have a response to make on this question.

6. 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?

- 6.1. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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

- 6.2. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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?

- 6.3. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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?

- 6.4. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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

- 6.5. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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

- 6.6. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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

- 6.7. This is one for the Council to comment on. Richborough do not have a response to make on this question.

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

- 6.8. Richborough consider that the site selection process in respect of the proposed allocation reference: B3 - West Redbourn, Redbourn, AL3 7HZ, has been robust.

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