

# HEARING STATEMENT

## **St Albans City and District Local Plan**

### Matter 2 – Housing Growth and Spatial Strategy

#### **On behalf of**

Taylor Wimpey Strategic Land  
(Land at Hill Dye Road, Wheathampstead)  
(Respondent no.330)

April 2025

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## 1. INTRODUCTION

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- 1.1 This Hearing Statement has been prepared on behalf Taylor Wimpey Strategic Land (TWSL) in response to questions set out in Matter 2 (Housing Growth and Spatial Strategy) of the Matters, Issues and Questions published in respect of the examination of the St Albans City and District Local Plan ('the Draft Local Plan' or 'DLP').
- 1.2 This Hearing Statement includes responses to specific questions under Issue 1 (Local Housing Need), Issue 3 (Settlement hierarchy), Issue 4 (Distribution of Housing Growth), and Issue 5 (Site Selection Methodology).
- 1.3 TWSL is promoting the residential development of Land at Hill Dyke Road, Wheathampstead ('the Site') through the plan-making process. The Site is proposed for allocation in the DLP (Allocation M2) for residential development.
- 1.4 Representations were made on the Regulation 19 Publication Draft Local Plan by TWSL and in respect of the Site (respondent no.330), through which changes to the plan were sought ('the Regulation 19 representations').
- 1.5 Matters raised within this Hearing Statement seek to avoid repeating points already made in the Regulation 19 representations, unless they expressly relate to the Matters, Issues and Questions published.
- 1.6 Our position is that the DLP is capable of being made sound, but that modifications are required to ensure this is the case.
- 1.7 Under the 2024 NPPF transitional arrangement, it is recognised that the DLP will be examined in relation to national policies contained in the December 2023 NPPF. Consequently, unless expressly stated otherwise, references to the NPPF in this Hearing Statement refer to the December 2023 NPPF.

## 2. ISSUE 1 – LOCAL HOUSING NEED

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### Question 1

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

- 2.1 We have interpreted the DLP as setting a plan period up to 2041. However, as per our Regulation 19 representations we consider there is a risk that the new Local Plan will not be adopted in time to ensure its strategic policies address the minimum 15 years from adoption required by the NPPF.

### Question 2

*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?*

- 2.2 We support the use of the Standard Method to determine the *minimum* number of new homes for which the DLP plans. It is important that this figure is articulated as a minimum within the new Local Plan, and that the new Local Plan's policies and allocations are predicated on the need to treat this figure as such.

### 3. ISSUE 3 – SETTLEMENT HIERARCHY

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#### Question 2

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

- 4.1 We have no concerns with how Wheathampstead has been in the two-part Settlement Hierarchy Study (June 2023) ('the SHS')
- 4.2 We also note that no stakeholders with a particular interest in Wheathampstead have raised no concerns in terms of how it has been assessed or categorised.

#### Question 3

*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?*

- 4.3 Determination of a settlement hierarchy is not an exact science, and we recognise that any attempt to quantify settlements' characteristics for the purposes of establishing a requirement hierarchy will be challenging.
- 4.4 In the case of the approach taken by the SHS, we consider this is proportionate and robust.
- 4.5 The identification of Wheathampstead as a 'Large Village' is justified, and the description of this tier of settlement within Table 1.3 reflects the characteristics of this village.
- 4.6 We note that neither Wheathampstead Parish Council nor the Wheathampstead District Preservation Society have raised any concerns with the assessment of the village by the SHS, or the DLP's resultant categorisation of the settlement.
- 4.7 Additionally, we suggest that insofar as concerns the soundness of the DLP, it is important to note that the DLP has evidently not placed undue reliance on the settlement hierarchy to determine the spatial strategy or distribution of housing.

## 4. ISSUE 4 – DISTRIBUTION OF HOUSING GROWTH

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### Question 1

*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 We note that the distribution of housing growth does not slavishly adhere to the settlement hierarchy, but nevertheless broadly reflects it. This is entirely appropriate.
- 5.2 Our position on how the settlement hierarchy has appropriately been used in conjunction with other factors to determine the DLP's spatial strategy and distribution of growth remains that which is set out in our Regulation 19 representations (please see paragraphs 2.7 – 2.17).
- 5.3 In particular, we wish to emphasise the need to ensure that in addition to focussing growth on larger settlements, the DLP also directs proportionate growth to smaller settlements to help sustain these communities and support their vitality. The need to do so, and the sustainability of such an approach, was recently reaffirmed through the examination of the King's Lynn and West Norfolk Local Plan Review. In this case, an adjournment to the examination was required to allow the Council to revisit its settlement hierarchy and spatial strategy in order to address concerns that *inter alia* the Plan did not reflect the housing needs of rural settlements. The Plan was subject to modifications, including those which directed appropriate levels of housing to rural settlements. It was then found sound, subject to main modifications, on the basis it "***should support the sustainable growth and vitality of rural services and communities, whilst retaining the identity, character and distinctiveness of individual settlements.***"<sup>1</sup>
- 5.4 The importance of directing at least some growth to settlements such as Wheathampstead is underlined by the response from the Wheathampstead and District Preservation Society (WDPS) to consultation on the Regulation 19 iteration of the DLP, in which it notes that:

*"Our community has worked hard to regenerate our High Street over the past 20 years and wants to ensure it remains a viable local retail area as well as the 300 or more "off the High Street" businesses that make up our local economy".*

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<sup>1</sup> Report to the Borough Council of King's Lynn and West Norfolk (21 February 2025) [70]

- 5.5 One of the key ways in which Planning can help support efforts to sustain the vitality of smaller settlements is to ensure that some additional housing (and thus additional potential users of the local high street, local services, and other local businesses) is directed such settlements. Clearly this needs to be balanced with other planning factors, including the need to retain the identity and character of villages.
- 5.6 It is recognised that in order to be effective, the distribution of growth needs to have regard to whether there are sustainable, deliverable sites for the development the strategy proposes. In the case of Wheathampstead, the Land at Hill Dyke Road evidently represents such a Site, including – but not limited to – its lack of contribution to the purposes of the Green Belt.

## 5. ISSUE 5 – SITE SELECTION METHODOLOGY

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### Question 8

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

- 6.1 We consider that the process of identifying the Site as a proposed residential allocation was robust, resulting in an allocation that is justified, effective and consistent with national policy.
- 6.2 Our position in this respect is detailed in paragraphs 7.11 – 7.72 of our Regulation 19 representations, but in overview the process incorporated a site-specific appraisal of the suitability of the Site through the Council's Housing and Economic Land Availability Assessment (2021) ('the HELAA'); as well as site-specific assessment of the Site's contribution to the purposes of the Green Belt (St Albans Stage 2 Green Belt Review (2023) ('the Green Belt Review'); and was supported by sustainability appraisal undertaken through the plan-making process.
- 6.3 Indeed, and again as detailed in our Regulation 19 representations, we consider that the assessment has, insofar as concerns the Site at least, been unduly negative regarding potentially suitability, particularly in its approach to considering impact on the Green Belt. The Site does not make as significant a contribution to the purposes of the Green Belt as the Green Belt Review alleges. This does not of course give rise to concerns in respect of the soundness of the Site's allocation, given it simply means its development will have less of a harmful impact on the Green Belt than the evidence base suggests.