

HEARING

STATEMENT

St Albans City and District Local Plan

Matter 2 – Housing Growth and Spatial Strategy

On behalf of
Beechwood Homes Contracting Ltd
(Respondent no.332)

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf Beechwood Homes Contracting Ltd (hereafter Beechwood Homes) 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 2 (The Housing Requirement), Issue 3 (Settlement Hierarchy), Issue 4 (Distribution of Housing Growth) and Issue 5 (Site Selection Methodology).
- 1.3 Beechwood Homes have land interests at Verulam Golf Club ('the Site') which is proposed for allocation in the DLP (Allocation M8) for residential development.
- 1.4 Representations were made on the Regulation 19 Publication Draft Local Plan by Beechwood Homes and in respect of the Site (respondent no.332), through which changes to the plan were sought.
- 1.5 Matters raised within this Hearing Statement seek to avoid repeating points already made in the representations made on the Regulation 19 iteration of the DLP, 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

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 For the Local Plan to be sound, it must adhere to national policy requirements. The National Planning Policy Framework (NPPF) mandates that strategic policies should address a minimum period of 15 years from the Local Plan's adoption.
- 2.2 For the current plan period to end in 2041 this would require adoption by March 2026 to meet the 15-year requirement. This tight timeline presents a potential risk and as set out in our Regulation 19 representations we suggest extending the plan period to at least 2042 to allow for more flexibility and ensure that the spatial strategy covers an adequate timeframe.

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?

- 2.3 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.
- 2.4 It is important that the Plan however remains adaptable to future housing needs noting the increasing in housing numbers brought in by the 2024 NPPF Standard Method. As set out at paragraphs 3.1.11 – 3.1.13 of the Regulation 19 representation, whilst the DLP is covered by transitional arrangements within the NPPF it would nonetheless likely require an immediate review following adoption to address updated housing targets (1,657 per year). The DLP should therefore seek to maximise the potential of all sites as far as possible, including maximising unit numbers on any sites proposed for allocation.

3. ISSUE 2 – THE HOUSING REQUIREMENT

Question 1

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 Whilst the Council has sought to explain in its response 5th March 2025 (SADC/ED34) in relation to Question 13 of the Inspectors' Initial Questions that the stepped trajectory is necessary because it reflects a realistic estimate of the time it will take for the allocations the DLP proposes, it fails to explain why additional allocations could not be proposed which bolster housing delivery in the earlier years of the plan period.
- 3.2 The proposed stepped housing trajectory needs to be seen in combination with the unjustified rejection of sustainable and deliverable sites that could provide much needed homes in the first five years of the plan period.
- 3.3 The potential ramifications of adopting significantly reduced housing requirements in the early years of the plan period should not be ignored. There is, for example, an acute affordable housing shortage in the District. The annual affordable housing need (443 – as per the Local Housing Needs Assessment, equates to 91% of the proposed annualised housing requirement (485) for the first five years of the plan. If 485 dpa were to be adopted as the housing requirement for the early years of the plan period, a very substantial affordable housing need would go unmet. Furthermore, if an artificially low housing requirement were to be adopted for these years, it could also frustrate opportunities to reduce housing shortage through development of, unallocated, grey belt sites in accordance with the 2024 NPPF.
- 3.4 The stepped approach fails to acknowledge that there are deliverable sites that could come forward in the short term. This is an issue that can nevertheless be rectified through main modifications. The Council should revisit potential residential sites previously rejected for allocation to determine if these can sustainably provide homes in the early years of the plan period.

4. ISSUE 3 – SETTLEMENT HIERARCHY

Question 2

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

- 4.1 As part of the Settlement Hierarchy Study Part 1 Baseline, all settlements were scored against factors including population, access, services and facilities and employment. Table 6 of the Study scores St Albans 54.5, putting St Albans at the top of the hierarchy. The scoring is thus robust in terms of its confirmation of St Albans being at the top of the hierarchy. St Albans is identified as being a Tier 1 settlement reflecting the size of its population, that it is a sub-regional centre for employment and high-order services such as secondary education, retail and leisure and that it offers choice and variety of sustainable transport provision and connectivity. The settlement hierarchy assessment is thus accurate and robust in relation to its assessment of St Albans.

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?

- 4.2 As per our Regulation 19 representation (see paragraphs 3.1.5 – 3.1.9) Policy SP1 highlights the importance of directing growth to the most sustainable locations identifying the City of St Albans as the primary focus in the district for housing, employment, services, retail, the evening economy and healthcare.
- 4.3 The focus on St Albans as a sustainable location for growth is strongly supported. This in turn should be reflected in the allocation of suitable sites to meet housing needs as part of the distribution. St Albans, as a Tier 1 settlement, is the District's most sustainable location for growth and should therefore be apportioned the highest levels of development. By directing the largest share of growth here, the Local Plan can more effectively support sustainable development objectives while protecting the distinct character of smaller settlements within the District.

5. ISSUE 4 – DISTRIBUTION OF HOUSING GROWTH

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 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.
- 5.3 It is important and appropriate therefore to focus additional growth on larger settlements, particularly that of St Albans which is identified as the key settlement. This extends to the allocation of the Site under Allocation M8 which is located adjacent to St Albans and which is a highly sustainable and deliverable allocation.

Question 5

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?

- 5.4 As set out in the Regulation 19 representation, the need for amendments to the Green Belt to meet housing needs is strongly supported. The acknowledgment of necessary Green Belt adjustments, particularly in and around St Albans, is essential particularly given the demand for housing is acute.

6. ISSUE 5 – SITE SELECTION METHODOLOGY

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 The Site is assessed under the Council's Site Selection Green Belt Sites Recommended Medium and Small Site Proformas under site reference C-299. The Site was assessed in terms of its sustainable development potential and was assessed against various criteria including in terms of environmental constraints, accessibility and any other key constraints including agricultural land classification and contamination. It is considered that the criteria taken into account were appropriate to assess the suitability of each site and that the sites that are proposed to be allocated by the DLP have been robustly evidenced as being sustainable and deliverable.