

St Albans Local Plan Examination in Public

Stage 1 Hearing Sessions

Matter 2

Statement on behalf of The Crown Estate

INTRODUCTORY STATEMENT

- i. Hearing Statements are submitted by David Lock Associates Ltd on behalf of The Crown Estate (hereinafter referred to as TCE), promoter of land at **East Hemel Hempstead (EHH)**.
- ii. TCE is the owner and promoter of East Hemel Hempstead (North), East Hemel Hempstead (Central) and East Hemel Hempstead (South), which are draft allocations ('Broad Locations') for mixed use development under Site Policies H2, H3 and H4 of the *St Albans Local Plan Regulation 19 Version* September 2024.
- iii. The three sites form part of the wider Hemel Garden Communities (HGC) programme area, awarded Garden Town Status by the government in 2019 and straddling the St Albans City and District Council (SACDC) and Dacorum Borough Council (DBC) administrative areas (see **HGC01.01** evidence paper for details). HGC is allocated with and referenced throughout the draft local plans for each Council's administrative area.
- iv. TCE has been positively engaged with the St Albans Policy Team since 2018 and throughout the evolution of the local plan, and more latterly with the Development Management Team in respect of the preparation of a planning application for EHH.
- v. TCE is engaging with the Stage 1 Examination in support of SACDC's commitment to the East Hemel Hempstead allocations in helping to meet the needs of the plan area within the plan period to 2041 and beyond. Those needs have been assessed in the evidence base and are articulated in the plan (in particular in Strategic Policy SP1). The allocations for EHH represent a spatial growth solution which is aligned with the overarching Vision and Objectives of the Plan as well as the Spatial Vision for Hemel Garden Communities – and will enable outcomes which ensure effective delivery of Plan objectives.
- vi. In response to the Inspectors' *Part 1 Matter, Issues and Questions (MIQ)* issued on 17 March 2025, TCE wish to make a number of points to supplement its representations made at the Regulation 18 consultation and the Regulation 19 consultation stages of the *St Albans Local Plan (SACDC LP)*.
- vii. Our Hearing Statements provide clarification of our clients' position to assist the Inspectors in consideration of their questions posed to the Council in the *Matters, Issues and Questions*.

MATTER 2 – HOUSING GROWTH AND SPATIAL STRATEGY**Issue 1 – Local Housing Need**

- 1.1 It is anticipated that **Questions 1 to 3** will be addressed by the Planning Authority.

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?*

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?*

- 1.2 We note the Council's response to the Initial MIQs (SADC/ED34) in respect of a suggested modification to Policy SP3 to allow for a stepped trajectory to account for the uplift in housing delivery in the new local plan, and the way in which this uplift is proposed to be delivered through strategic growth allocations alongside smaller/medium sized development allocations.
- 1.3 We support this approach, and concur with the Council's justification for it, as set out in para 13.1-13.7 of SADC/ED34 and the reference to the Lichfield's *Start to Finish* research.
- 1.4 DLA has extensive experience of the planning and delivery of comparable strategic site allocations, particularly across the South and East of England, a good number of which are well underway or substantially complete. We agree that contributions that such sites make to the annual housing trajectories of local authorities can vary in the early years, which is why a stepped trajectory for overall development plan delivery can be a pragmatic and sound approach to take in forward planning across a 15 year plan period, supported by guidance and NPPF policy.
- 1.5 It is for the Council, through the Examination process, to confirm the precise housing trajectory figures to be included in the first five years post-adoption, and the uplift thereafter to 2041. However, to assist the discussion at Examination, provided in Table 1 below are some comparable examples of local authority housing delivery trajectories from the south of England where the local plans of the authorities included a substantial proportion of their overall housing land supply delivered through strategic sites of the scale and nature proposed in the St Albans draft Plan.

Table 1. Housing Delivery Trajectories (as delivered) of comparable Local Plans with substantial SUEs/Strategic Site Allocations

Authority	Year period	Total per annum	Averages (Yrs 1-5; 6-13)	Total per annum: Expansion Areas (SUEs)	Expansion Areas (SUEs) as % of overall delivery	Source
Milton Keynes CC	2011-12	1580		breakdown figures for SUEs not available prior to 2014		https://www.milton-keynes.gov.uk/sites/default/files/2022-01/FIVE%20YEAR%20LAND%20SUPPLY%20REPORT%202014-2019.pdf
	2012-13	1302				https://www.milton-keynes.gov.uk/sites/default/files/2022-01/MKC%20Assessment%20of%20Five%20Year%20Land%20Supply%202015-2020.pdf
	2013-14	1000				
	2014-15	1421				
	2015-16	1191	Average = 1299	552	38.85	Housing Statistics 1991-2025 - Q1.xlsx
	2016-17	1230		539	45.26	Starts and Completions by Parish 2020-24.xlsx
	2017-18	1519		715	58.13	
	2018-19	1775		958	63.07	
	2019-20	2076		1049	59.10	
	2020-21	1993		1231	59.30	
	2021-22	2003		1065	53.44	
	2022-23	2895	Average = 1927	1180	58.91	
	2023-24	2895		1352	46.70	
Total	2016-2023	13491		8641	64.05	
Average 2016-23		1124		960		

Authority	Year period	Total per annum	Averages (Yrs 1-5; 6-13)		Source
Cherwell District Council	2011-2012	356			https://www.cherwell.gov.uk/monitoring
	2012-13	340			
	2013-14	410			
	2014-15	946			
	2015-16	1425	Average = 695		
	2016-17	1102			
	2017-18	1387			
	2018-19	1489			
	2019-20	1159			
	2020-21	1192			
	2021-22	1188			
	2022-23	1318			
	2023-24	805	Average = 1205		
Total	2011-24	13117			

Authority	Year period	Total per annum	Averages (Yrs 1-5; 6-9)		Source
Swindon Borough Council	2011-2012	889			https://www.swindon.gov.uk/downloads/file/6320/housing_monitoring_report
	2012-13	631			
	2013-14	591			
	2014-15	641			
	2015-16	1411	Average = 833		
	2016-17	1434			
	2017-18	842			
	2018-19	1145			
	2019-20	723	Average = 1036		
Total	2011-20	8307			

- 1.6 In all cases, the data shows a stepped trajectory in overall delivery in the first years, increasing delivery rates significantly once the strategic urban extension (SUE) allocations were consented and underway.
- 1.7 The Milton Keynes example is particularly relevant, due to:
- (a) As with the St Albans Local Plan spatial strategy, urban extensions form a significant proportion of the overall housing land supply and contribution to year-on-year delivery throughout and beyond the plan period; and
 - (b) two of the Strategic Expansion Areas (c 6,000 and c 4,000 homes respectively) were delivering concurrently on two sides of the same existing urban area and within the same Housing Market Area – in much the same way as the allocated land within Hemel Garden Communities is positioned to the North (DBC) and East (SACDC) of the urban area of Hemel Hempstead.
- 1.8 This evidence assists in demonstrating the appropriateness and soundness of the Council's approach to the inclusion of a stepped requirement in the context of the St Albans' spatial strategy which proposes the delivery of a good proportion of the District's housing growth through the strategic allocations ('Broad Locations') at East Hemel Hempstead.
- 1.9 It is anticipated that **Questions 1 to 3** will be addressed by the Planning Authority.

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

- 1.10 It is anticipated that this question will be addressed by the Planning Authority.

Issue 3 – Settlement Hierarchy

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?*

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

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?*

- 1.11 It is anticipated that **Questions 1 to 3** will be addressed by the Planning Authority.

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?*

1.12 It is anticipated that this question will be addressed by the Planning Authority.

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?*

1.13 As noted in our representations on earlier stages of the local plan's drafting, we support the Council's recognition of the important contribution that as strategic sites, the HGC allocations at East Hemel Hempstead can make to delivering the objectives of the Plan, and that the 'LG' policy framework is appropriately 'front and centre' in the plan in providing a strategic policy context.

1.14 However, in terms of how strategic sites are allocated within the local plan, we have consistently suggested that as the plan moved through Regulation 19 and Submission versions, the term 'Broad Locations' for sites of over 250 dwellings in the plan may benefit from a change of title to reflect the increased certainty around site boundaries and development components confirmed through local plan evidence base testing, and in the case of the HGC Broad Locations, the HGC programme and Framework Plan activity [Evidence Paper HGC01.01 refers].

1.15 The term 'Broad Locations' is usually given to much wider 'areas of search' in initial draft local plan (Issues and Options or Reg 18 Stages) when indicative development locations are being refined through SA and other technical assessment processes prior to the identification of specific or individual site allocations, and that not all of a 'broad location' may in fact be confirmed as appropriate or necessary for development.

1.16 In respect of the HGC Broad Locations (site allocations H1-H4), these sites are now precisely defined in Part B of the plan terms of their respective 'red line' boundaries, the proposed Green Belt boundary adjustment and the quanta of development and infrastructure that each site is expected to deliver. On this basis we consider that the use of the term Broad Locations is no longer appropriate and risks introducing an unnecessary level of uncertainty and differentiation between allocated development sites for those using the local plan.

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

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?*

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?*

1.17 It is anticipated that **Questions 3 to 5** will be addressed by the Planning Authority.

Issue 5 – Site Selection Methodology

1.18 It is anticipated that **Questions 1 to 3** will be addressed by the Planning Authority.

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?*

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

1.19 In respect of the Hemel Garden Communities area (of which East Hemel Hempstead site allocations H2-H4 are a core element), in order to form a robust assessment of the capacity and deliverability of the Growth Areas within both DBC and SADC administrative boundaries a joint Framework Plan exercise was undertaken [see HGC Evidence Paper HGC 01.01]. This exercise was led by HGC with input from both planning authorities and Herts County Council as transport and education authority.

1.20 This work enabled the testing of the development capacity of the Growth Area overall, and within each constituent authority boundary, and determined how the necessary supporting infrastructure and facilities could be spatially accommodated and distributed within the proposed allocation areas.

1.21 It also enabled the preparation of an infrastructure schedule which was informed by inputs from the three authorities. Infrastructure requirements were independently costed and were subject to viability assessment by the principal landowners within the Growth Area to test the deliverability of the wider Framework Plan area. Subsequently, the infrastructure schedule has been used to

inform a more detailed exercise undertaken by HGC, which also draws on the fullest understanding of infrastructure needs as set out in the Infrastructure Delivery Plans (IDPs) for the SACDC and DBC Local Plans. This consolidated HGC IDP is currently being prepared, and it is understood that this will be subject to further viability assessment prior to the Stage 2 Hearings.

1.22 It is anticipated that **Questions 6 to 8** will be addressed by the Planning Authority.