

St Albans City and District Council
Local Plan 2041
Independent Examination

Written Statement relating to Matter 2

Hill Residential Ltd
April 2025

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1.0 Introduction

- 1.1 This examination statement is submitted on behalf of Hill Residential Ltd (Hill) in respect to Matter 2 of the St Albans City and District Council (SADC) Local Plan 2041 examination process. The comments provided respond directly to the Planning Inspectors' questions set out in the *Matters, Issues and Questions for Stage 1* document (ED69). The responses should be read in conjunction with the submitted examination statement regarding Matter 1 and Hill's Regulation 19 representations (submission number: 350 LPCD 20.03 – Page 2597- 2647), copies of which can be re-provided on request.
- 1.2 In responding to the Inspectors' matters, issues and questions, due regard is had to the NPPF paragraph 35 in assessing the Plan's soundness.
- 1.3 Hill responded to the previous Reg 19 Submission Draft Local Plan consultation in November 2024, including submissions in relation to housing growth and the spatial strategy and draft strategic policies SP1 (A Spatial Strategy for St Albans District) and SP3 (Land and the Green Belt) with regard to Matter 2. The previous representations remain valid, unless specifically updated by this submission.
- 1.4 Hill is promoting land at Townsend Lane, Harpenden (the Site), on behalf of the landowner, Lawes Agricultural Trust (the Trust), for a sustainable and deliverable residential allocation within the emerging SADC Local Plan. The submission plan retains the draft residential allocation of the Site (referenced under M7) which is strongly supported by Hill and the Trust. Harpenden is one of the district's largest settlements and we agree with the Council that the site is a suitable and sustainable opportunity for future residential development. It is directly adjacent to the existing settlement boundary, in close proximity to public transport connections and local services, unconstrained and lacking technical obstacles to delivery, and is available for development now (subject to Green Belt release).

2.0 Matter 2: Housing Growth and Spatial Strategy

- 2.1 Hill has previously submitted representations in relation to this matter and continues to provide comments in regard to local housing need and the plan period, position on unmet need and the stepped housing trajectory, which it is considered can be overcome by addressing the matters through this Local Plan.

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?

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 Paragraph 1.5 and Strategic Policies SP1 and SP3 of the submitted Local Plan state that it covers the period from 1 October 2024 to 31 March 2041 (16.5 years). It is noted that Policy SP1 stipulates that SADC will identify and allocate 14,603 net additional houses over the plan period (885 dwellings per annum), which also equates to 16.5 years. Hill strongly supports SADC's proposal to meet at least the identified housing need of 885 dwellings per annum (dpa) over the plan period, as calculated using the previous standard method which applies in this case. Hill considers that starting the plan period midway through 2024, whilst not unsound, is potentially confusing for users of the plan and suggests that it should be explicitly set out so that it is clear it is calculated upon 16.5 years.
- 2.3 Notwithstanding the above, as set out in the Regulation 19 consultation response, Hill notes that the Regulation 18 consultation plan calculated housing need on a full 17 year plan period and it is not clear or justified in the evidence base why this has now reduced. The most recent South West Herts Local Housing Needs Assessment Update (LHNA, 2024) is based upon 17 years and in Table 2.1 sets out the SADC plan period as the full 2024-2041. The identified housing need of 885 dpa over the evidenced plan period (17 years) would be 15,045 net additional houses.
- 2.4 To be clear, Hill does not object to the 16.5 year plan period provided SADC include greater clarity within policy and the evidence base supports the reduced plan period. This will ensure the Local Plan is consistent with the objective to meet LHN and is positively prepared and justified.

The PPG advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Circumstances may include situations where there are growth strategies for an area, where strategic infrastructure improvements are proposed or where an authority is taking on unmet housing needs from elsewhere.

Question 3 - Do any of these circumstances apply to St Albans?

- 2.5 As Hill has set out in its statement in relation to Matter 1 (which we would refer the Inspector to avoid repetition), and with regard to unmet need, SADC's Duty to Cooperate Statement of Compliance (dated 29 November 2024) (LPCD

06.01) and Statements of Common Ground with neighbouring authorities all state that no unmet needs have been identified and that no neighbouring authorities have formally requested that the SADC local plan provides for unmet need. However, this is in contrast to the position as set out within the Sustainability Appraisal (2024) (LPCD 03.01), which stipulates at Box 5.1 that unmet need is a significant issue (e.g c.7,000 homes for Three Rivers, c.3,000 homes for Hertsmere, c.2,800 homes for Dacorum), indicating that housing need may be higher.

- 2.6 As such, SADC should consider and respond to the unmet need position identified in the Sustainability Appraisal and consider how it could increase its own housing requirement/supply, where practical, to address some of these unmet needs. If this process has already taken place and been addressed, SADC will need to demonstrate this and show how it has been taken into account in reaching its housing requirement in order to maximise the effectiveness of the Local Plan.

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?

- 2.7 As noted in the previous Regulation 19 consultation response, Hill does not consider the stepped housing requirement to be justified. The Council are proposing to adopt a stepped trajectory that would see a housing requirement of 485 dpa in the first five years post adoption 2026/27 to 2030/31, stepping up to 1,255 dpa between 31/32 to 35/36. The remaining 5 years of the plan sees the requirement fall to 1,025 dpa. As set out in paragraph 68-021 of the PPG, the Council need to provide evidence as to why they consider the use of a stepped trajectory as necessary and that the proposed trajectory does not seek to unnecessarily delay meeting identified development needs.
- 2.8 Paragraph 3.27 of the submitted plan states that the housing trajectory has been stepped in order to allow sufficient time for the significant uplift in housing delivery to be realistically delivered. As noted in Hill's Regulation 19 consultation response to Policy SP1, there has been significant and continued under-delivery in the district, resulting in a clear need to bring forward at least 885 dpa from the outset to help redress the Council's pressing affordability issues and affordable housing needs. Early delivery of sites must be maximised and made a priority in order to begin to help stabilise and improve affordability as early as possible and boost supply in the short term
- 2.9 In this context, the stepped requirement should be removed. In the case that use of a stepped requirement is considered to be sound, then it should be amended to bring forward 885dpa from the outset for the reasons set out above.
- 2.10 Further, delivery of the stepped trajectory over the plan period is expected to be 14,989, providing a buffer between needs and supply of just under 400 homes (ie around 2.6%). Hill considers this to be wholly insufficient to take account of the risks around some of the larger allocations not coming forward as expected, and would instead anticipate a buffer of at least 10% to 15%. This provides the necessary certainty that the Local Plan will meet its objectives over the plan

period, but also provide head room for the inevitable changes in delivery assumptions as the plan progresses through examination.

Question 2 - 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?

Question 3 - Is the housing requirement intended to be found in Policy SP1 or SP3?

- 2.11 Similar to Strategic Policy SP1, Policy SP3 sets out the minimum number of homes that the council is required to deliver over the plan period. The supporting text and Table 3.2 contain the housing trajectory for the submitted Local Plan which includes a stepped requirement.
- 2.12 As set out in the Regulation 19 consultation response, Hill still considers that Policy SP3 and its supporting text with Table 3.2 are confusing and an unnecessary duplication to repeat the housing requirement that has already been stated in SP1. Paragraph 16f of the NPPF sets out that this should be avoided. Consequently, Hill considers that a stepped requirement should not be included within Policy SP3.
- 2.13 Hill would suggest that the housing requirement continues to be dealt with under SP1 and that SP3 simply states that the Council intends to meet the current standard method housing need in full as set out in SP1 (notwithstanding the comments and issues raised on the total housing need figure across the plan period as set out in response to Issue 1), and that in order to achieve this objective, it will need to amend Green Belt boundaries. This will give it a clear purpose, in accordance with the NPPF.

3.0 Conclusions

- 3.1 Hill welcomes SADC's overarching spatial strategy as a general approach and the requirement to meet the need for homes based on the Standard Method figure as an absolute minimum. Further, Hill strongly supports the proposed allocation of the land at Townsend Lane (under site M7).
- 3.2 However, SADC will need to review the total housing need figure against the plan period, clarifying the 16.5 year plan period and confirming the position on unmet need and how it impacts the housing requirement. In addition, Hill still object to the stepped requirement which is not sufficiently justified given the Council's pressing affordability issues and significant and continued under-delivery in the district. Hill therefore requests these policies be clarified, amended or removed as set out, to ensure they are sound, justified and consistent with National Policy.

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