

HEARING

STATEMENT

St Albans City and District

Local Plan (Stage 2)

Matter 2 –
Housing Growth and
Spatial Strategy

On behalf of

Pigeon Capital Management 4 Ltd
(Land off Sandpit Lane, St Albans)
(Respondent no.364)

September 2025

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf PCML4 Capital Management 4 Ltd (PCM4L) in response to questions set out in Matter 2 (Housing Growth and Spatial Strategy) of the Stage 2 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 2 (the Housing Requirement).
- 1.3 PCM4L is promoting Land off Sandpit Lane ('the Site') through the plan-making process for a high quality, landscape and design-led sustainable scheme for approximately 200 new homes, strategic landscaping and open space.
- 1.4 The Site forms the land referenced 774 in the Council's Call for Sites; and SAN-03-21 in the Council's Housing and Economic Land Availability Assessment (HELAA) (2021/22).
- 1.5 The Site is not proposed to be allocated in the DLP.
- 1.6 Representations ('the Regulation 19 representations') were made on the Regulation 19 Publication Draft Local Plan by PCM4L and in respect of the Site (respondent no.365), through which changes to the plan were sought.
- 1.7 Hearing Statements were subsequently submitted in response to the Stage 1 Matters, Issues and Questions in support of the Stage 1 Hearing Sessions which took place between April and May 2025.
- 1.8 Matters raised within this Hearing Statement seek to avoid repeating points already made in the representations on the Regulation 19 iteration of the DLP, unless they expressly relate to the Matters, Issues and Questions published.
- 1.9 Our position is that the DLP is capable of being made sound, but modifications are required to ensure this is the case.
- 1.10 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 – HOUSING REQUIREMENT

Question 1

Following discussions at the Stage 1 hearing sessions, the Council accepted that the annual housing requirement should be applied across the full plan period from April 2024 to March 2041. It was also accepted that a recalibration of the stepped housing requirement was needed to reflect the most up-to-date position on predicted housing delivery and the forward trajectory.

Q1 How should the minimum housing requirement be reflected in the Plan to address these soundness matters? Is there a need for the housing requirement to feature in Policies SP1 and SP3?

- 2.1 PCML4 acknowledges that the Council has proposed revisions to the housing requirement and trajectory since the Stage 1 sessions. However, the updated trajectory has not yet been published, and it is therefore difficult for participants and the Inspector to assess whether the figures presented will be effective in delivering the District's identified needs. We consider that the importance of this updated trajectory cannot be overstated, particularly given the changes already accepted through the recalibration of the stepped requirement and the adjustments arising from the Flood Risk Addendum.
- 2.2 Notwithstanding this, we maintain the view expressed in its Stage 1 hearing statements that the housing requirement in the early years of the Plan should be greater than currently proposed. As highlighted in Stage 1 (Matter 2, Issue 2, paras 3.1–3.12), the stepped trajectory has the effect of suppressing delivery during a period when the District faces acute pressures, including a very high level of affordable housing need and a persistent record of under-delivery. A stronger early-years requirement would provide a more effective response to these challenges and ensure that the Plan better reflects the full scale of housing need.
- 2.3 In this context, PCML4 suggests that additional sites capable of contributing to early delivery should be identified. St Albans represents the obvious first sequential location for such allocations, being the most sustainable settlement in the District (Stage 1, Matter 2, Issue 3, paras 4.1–4.4) and with omission sites, such as Land off Sandpit Lane, available, unconstrained, and capable of coming forward quickly.
- 2.4 Ensuring that the revised trajectory provides for a stronger level of early delivery will be critical to the Plan's effectiveness. This may require modest adjustments to the requirement before the step and the allocation of additional deliverable sites in St Albans. By taking this approach, the Council can

provide greater confidence that the Plan will meet needs in full, address historic under-delivery, and maintain a resilient five-year housing land supply.