

HEARING

STATEMENT

St Albans City and District Local Plan (Stage 2)

Matter 9 – Housing Land Supply

On behalf of

Pigeon Capital Management 4 Ltd
(Land Northwest of Batchwood Drive, St
Albans)
(Respondent no.365)

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 3 (The Green Belt) 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 (Five Year Housing Land Supply).
- 1.3 PCM4L is promoting Land northwest of Batchwood Drive ('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 SA-16-18 & SA-16-21 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 that 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 2 – FIVE YEAR HOUSING LAND SUPPLY

Question 6

What are the implications if some of the larger sites, such as the 'Broad Locations' and sites associated with the HGC do not deliver as expected? Is there sufficient flexibility to ensure that the Plan will not become out of date?

- 2.1 PCML4 fully supports the principle of broad locations and the Hemel Garden Communities as central elements of the Council's long-term housing strategy. These sites will play a vital role in meeting the District's needs across the plan period. However, the Local Plan must also ensure that its housing supply is resilient, particularly in the early years, given the District's long-standing challenges in keeping pace with housing requirements.
- 2.2 As demonstrated at Stage 1 (Matter 2, Issue 2, paras 3.6–3.11). St Albans has one of the most persistent records of past under-delivery nationally, never achieving more than 69% of the housing requirement in the Housing Delivery Test. At the same time, the evidence identifies a substantial affordable housing need, amounting to 443 dwellings per annum — a figure that on its own almost matches the stepped early-years requirement. Against this background, reliance on a limited pool of strategic locations, however well planned, leaves the Plan exposed unless there is sufficient flexibility built into the supply.
- 2.3 To address this, we suggest that the Council make modest adjustments by allocating additional sustainable sites in and around St Albans. This approach would not detract from the role of the broad locations or HGC; rather, it would complement them by ensuring that the housing trajectory is supported by a diverse range of deliverable sites capable of contributing quickly. Omission sites such as Land northwest of Batchwood Drive are available now, unconstrained by strategic infrastructure dependencies, and well-placed to deliver in the first five years. Their inclusion would therefore provide an important "insurance" mechanism, safeguarding the five-year housing land supply and ensuring that the Plan remains effective even if pressures on delivery continue to be felt.
- 2.4 The Local Plan will be strengthened, and soundness secured, by incorporating additional deliverable sites in St Albans to complement the Council's strategic growth areas. This would provide flexibility to address significant past under-delivery, respond more effectively to acute market and affordable housing needs, and maintain a robust five-year housing land supply throughout the plan period.