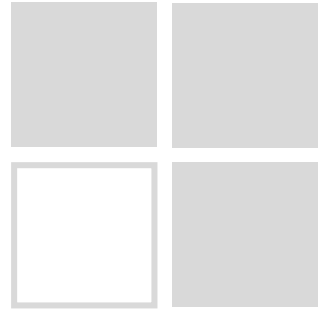


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St Albans Local Plan Examination

Stage 2, Matter 4 – Type and Mix of Housing, 15 October 2025

Hearing Statement

On behalf of:

**Gate Herts (Gypsy & Traveller Empowerment, Hertfordshire),
Representation 372; and
Myles Green, Representation 158**

**MH Planning
12 September 2025**

1.0 Introduction

- 1.1 In responding to the Inspectors' questions this statement refers to the evidence in the representations we submitted to the Regulation 19 Draft Local Plan Consultation and to the Additional Documents Consultation relating to SADC/ED79, Meeting the identified needs for Gypsies and Travellers and Travelling Showpeople – Additional Clarification.

2.0 Issue 2 – Affordable and Specialist Housing

Q2 Will the Plan ensure that affordable housing needs are met? If not, what modifications could be made to ensure that needs are met in full?

- 2.1 As far as we are aware, the Local Plan evidence base does not provide information about the level of need for affordable and specialist housing for Gypsies and Travellers. Para 7.28 of the GTAA is not helpful, although the waiting list for pitches would have been one of the starting points for understanding the need for affordable accommodation.
- 2.2 Social rented pitches are not the only way of providing affordable accommodation for Gypsies and Travellers, indeed they are a relatively expensive way of providing such accommodation. The proposal for clusters of part developed self-build pitches, see our response to Matter 6 paras 3.8 to 3.11, would be a cost-effective way of facilitating the provision of accommodation, which meets Travellers needs and would be affordable for many families.
- 2.3 Levels of ill-health are high among the Gypsy and Traveller communities. New facilities should be designed to be accessible for wheelchairs and, reflecting the needs of the proposed occupants, a proportion of new pitches should be specially adapted. Providing a proportion of pitches on new social rented sites for elderly residents, as we have suggested at para 3.6 of our response to Matter 6, will help to ensure that accommodation meets the community's needs.

3.0 Issue 4 – Self-Build and Custom Housebuilding

Q1 What is the anticipated need for Self and Custom Build over the Plan period? Does Policy HOU5 provide an appropriate basis for meeting that need?

Q2 Are the requirements of Policy HOU5 justified, and will they be effective?

3.1 At para 5.2 of GATE's representations on the Regulation 19 Local Plan we made the point that not including reference to Gypsies and Travellers in Policy HOU5 was discriminatory and including it would potentially give Travellers access to the land to be made available to self-builders.

3.2 Here we would make two further points. Our proposal for clusters of part developed self-build is self-build accommodation, and such provision might be particularly appropriate within the Broad Locations for Development. In another area a Council has required us to assess a site for biodiversity net gain on the basis that the self-build exemption applies to self-build housing, but not self-build Traveller pitches. We believe that Council's approach is likely to be unlawful because it is discriminatory, and including reference to Gypsies and Travellers in Policy HOU5 will help avoid biodiversity net gain requirements being inappropriately applied to Traveller proposals in St Albans.

4.0 Issue 5 – Accommodation for Gypsies, Travellers and Travelling Showpeople

Q1 Does the Plan adequately set out the accommodation requirements for gypsies, travellers and travelling showpeople over the plan period?

4.1 No, for the reasons at paras 2.1 - 2.6 and 4.1 – 4.2 of our Hearing

Q2 Will the accommodation requirements be met through the allocations and policies in the Plan? If so, how? Should sites identified by the Council as contributing towards identified needs be allocated in the Plan?

- 4.2 Apart from the proposals for two 15 -20 pitch sites in East Hemel Hempstead, which may be equated with broad locations for growth, the plan ignores the para 10 a) and b) PPfTS requirement to identify a 5 years' supply of specific deliverable sites, and a supply of specific developable sites or broad locations for growth for years 6 to 10, and where possible for years 11 to 15.
- 4.3 At para 3.20 of our response to SADC/ED79 we concluded: *'The Draft Local Plan does not comply with the requirements of PPfTS paras 10 a) and b). We would ask the Local Plan Examination Inspectors to require St Albans to carry out a study to identify a supply of Gypsy and Traveller residential allocations. The potential allocations would need to be subject to public consultation and sustainability appraisal, and brought forward as modifications to the Draft Plan. This work should include an appraisal of the Broad Locations for Development to identify which of them should include site allocations and / or broad locations for growth.'*
- 4.4 Not only does it fail to identify the required specific deliverable sites, and specific developable sites, for the reasons at paras 4.4 to 4.12 of our Reg 19 Representation, it fails to indicate how those needs will be met. At paras 3.5 – 3.19 of our response to SADC/ED79, we identified why the assessment of potential sites at paras 3.10 – 3.27 and Appendix of SADC/ED79 was inadequate and did not represent an adequate analysis of the likelihood of those sites coming forward for development.

- 4.5 Effectively, the Council's position is that potential capacity within Traveller owned sites means that needs can be met without the need for allocations and policies, which promote and are permissive of development. This represents a continuation of the existing situation. But the existing situation is not working. The St Albans annual monitoring reports show that in the 5 years 2019 / 2020 to 2023 /24 that 24 additional pitches were approved, an average of 4.8 pitches a year (and of course many of those were won on appeal in the Green Belt. The figures at para 4.7 below suggest that in the 5 years 2027 to 2032 that an average of 17.2 pitches will be required each year, if needs are to be met (and that is before any additional need from housed Travellers, and from reviewing the overcrowding on sites are included). A much more welcoming, proactive policy framework is required.

Q3 Will there be a 5-year supply of deliverable pitches against the requirement?

- 4.6 No, because the plan fails to identify any specific deliverable sites. While any unimplemented planning permissions are likely to count towards the 5-year supply, we are not aware there are any.
- 4.7 We would also make the point that in producing the local Plan the Council is not only required to identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets, but also to identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 (and, where possible, for years 11-15).
- 4.7 On the assumption that the plan is adopted in 2027, and based on the level of need in the table at para 4.11 of our hearing statement on legal compliance (that is before any additional need from housed Travellers, and from reviewing the overcrowding on sites is included):
- the 5 years supply of specific deliverable sites required by PPfTS para 10 a) would equate to the need for the 5 years 2024

– 2028 and four fifths of the need for 2029 to 2033, that is $72 + 18 \times \frac{4}{5} = 86$ pitches (rounded);

- the supply of specific developable sites or broad locations for growth for years 6-10 would equate to one fifth of the need for 2029 to 2033, and four fifths of the need for 2034 to 2038, that is $18 \times \frac{1}{5} + 20 \times \frac{4}{5} = 20$ pitches (rounded).

- 4.8 This means that the Plan must as an absolute minimum identify allocations equivalent to $86 + 20 = 106$ pitches, plus any additional needs from Travellers in housing and revisiting overcrowding.

Q4 What is the justification for the inclusion of pitches on sites at Hemel Garden Communities (South and Central)? When and how are these sites going to be delivered? Are they justified and effective?

- 4.9 We address these issues at paras 3.1 to 3.12 of our hearing response on Matter 6, Hemel Garden Communities.

Q5 What is the justification for Policy HOU6(b) and (c) and are they sufficiently clear enough to be effective?

- 4.10 We question whether Policy HOU6 b) adds value. Although some of the wording needs adjustment, the draft policy we proposed at paras 4.18 – 4.22 of GATE's representations on the Regulation 19 Draft Local Plan provides an appropriate framework for the required policy coverage in the Plan. We suggested it should cover: pitch targets; site allocations; (dependent on the work on site appraisal) pitches developed as part of or in association with the Broad Locations for Development; Loss of Pitches; and Planning applications on non-allocated sites.

- 4.11 If HOU6 b) is retained in some way it should include

consideration of the likely occupants needs – for day rooms, vehicle parking, static caravans, amenity space etc and of being large enough to avoid risks of fire.

- 4.12 Policy HOU6 c) is a statement of the obvious and adds nothing.

Q6 What effect will the provision of new pitches have on the Chilterns Beechwoods SAC from allocations in the Plan and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

- 4.13 We address this at para 5.3 of GATE's representations on the Regulation 19 Draft Local Plan.

Q7 How would decision-makers be expected to respond to windfall development proposals?

- 4.14 While an adequate supply of allocations is needed for the Plan to meet the requirements of Para 10 a) and b), PPfTS, and to influence where applications will come forward, windfall proposals may also come forward, and policy such as that we proposed at para 4.22 of GATE's representations on the Regulation 19 Draft Local Plan will assist decision makers make fair and rational decisions, as well as helping site owners what is likely to be approved.