

18TH SEPTEMBER 2025

Inspectors Matthew Birkinshaw BA(Hons) MSc MRTPI
and Thomas Bristow BA MSc MRTPI

Our reference: CORR/5

VIA EMAIL TO PROGRAMME OFFICER

Dear Sirs

Re: St Albans Local Plan Review

You will be aware that we have made a number of submissions to the Local Plan examination at Regulation 19 and for the Stage 1 hearings.

We do not wish to repeat these submissions but invite you to take them to account as you assess the relevant questions at the Stage 2 hearings.

We have answered some of the questions that you invited participants to respond to.

Matter 1 Legal Compliance

Issue 3– Public Sector Equality Duty

3. Policy SP4 'Housing' sets out that to provide good quality housing that meets the needs of all parts of society, the Council seeks to address the needs of 'Gypsies, Travellers and Travelling Show People'. The Plan's approach is informed principally by the 2024 Gypsy and Traveller Accommodation Assessment ('GTAA'), along with the Evidence Paper and Evidence Paper Addendum.
4. At the Stage 1 hearing sessions, the Council explained that it has undertaken further work following the Evidence Paper Addendum to assess the delivery potential of pitches and plots. The updated evidence was published in Examination Document SADC/ED79 and made available for consultation. It

describes a potential capacity for 162 pitches against a need figure of 95 pitches to 2041.

Q1 Is the minimum requirement figure based on a robust, objectively assessed analysis of needs over the plan period? Is the Plan effective in identifying the pitch requirement and stating how those needs will be met?

Q2 What process did the Council follow in seeking to meet the identified needs referred to above? How were potential sites identified and was this process robust?

Q3 If the accommodation needs of 23 households (who were found in the GTAA not to meet the PPTS 2023 definition of gypsies and travellers) are intended to be met through 'bricks and mortar' accommodation, is that expressly accounted for in the Plan's housing requirement?

The council has failed to address the needs of gypsies, travellers and travelling showmen accommodation by: (a) not addressing traveller needs in the Green Belt Review it commissioned in 2021, so that any potential sites could be considered in the context of this review and then subject to a sustainability appraisal; (b) only conducting a call for sites in 2024 when the draft Local Plan was in an advance stage of preparation; (c) not allocating sufficient sites for this group of people with "protected characteristics" that face well known barriers to achieving housing in a district that has some of the highest land prices in the South East; and (d) not even "retro" allocating the unauthorised travelling showman's site in the district. SADC/ED79 and the various AMRs the council has produced show that it has a poor track record in approving windfall sites for this vulnerable group.

It is for the inspectors to assess if these cumulative failures represent a breach in the council's Public Sector Equality Duty and thus undermine the whole of the Local Plan.

We have previously submitted that the council could easily correct its mistakes by allocating the shortfall of gypsy and traveller housing on broad locations and then calling for additional allocations that would have to be achieved through releasing more Green Belt land.

Matter 2

Housing Growth and the Spatial Strategy

Issue 1 – Housing Requirement

5. 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?

To assist with the examination hearing sessions, it would be useful for the Council to produce a new housing requirement figure and trajectory to replace Table 3.2.

The housing requirement must as a minimum address the homes the district needs starting from the date when work first began on the Local Plan, that is 2021. If the Local Plan is to run till 2041, this means 20 years and a minimum of 17,700 homes (that is 885×20) plus a buffer of 20% for consistent years of under delivery.

The trajectory in Table 3.2 is impossible to read, includes homes approved and built since 2021 and fails to show a sufficient number of sites coming forward over the next five years.

This means the council must identify more sites to be allocated into the draft Local Plan.

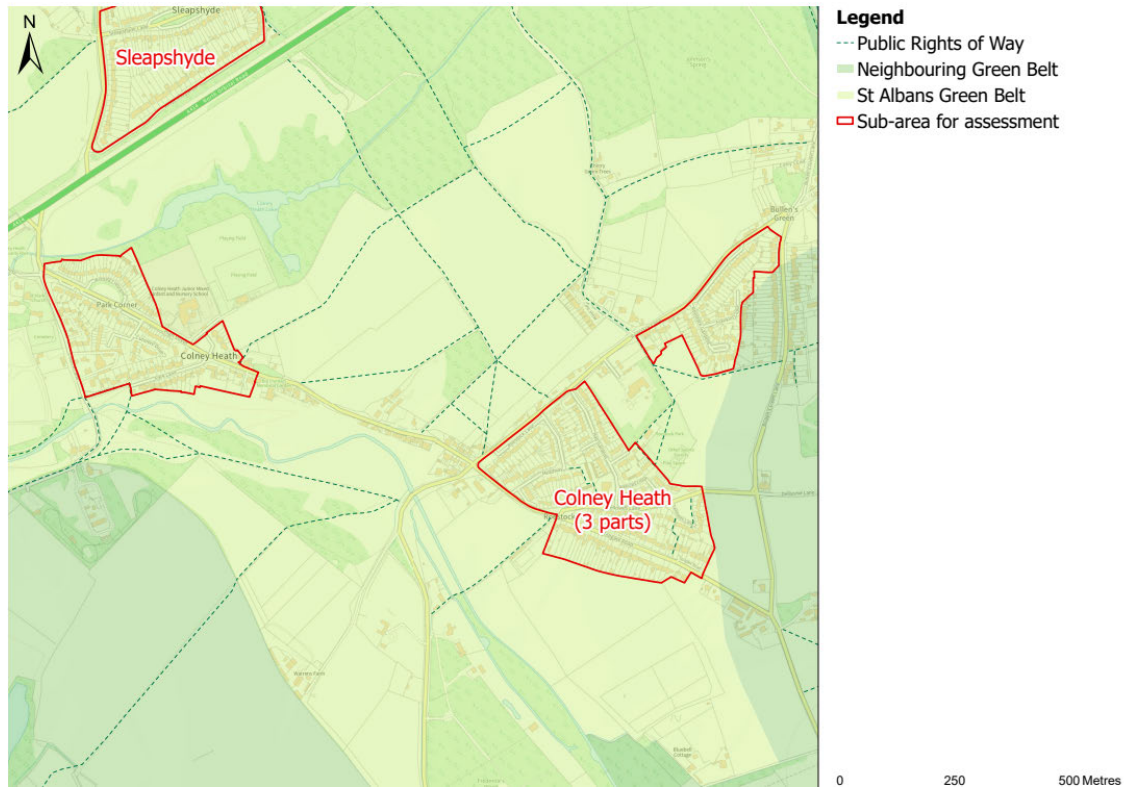
Matter 3 The Green Belt

Issue 1 – Green Belt Review

Q4 What is the justification for defining boundaries for those settlements that remain washed over by the Green Belt? Are the boundaries justified and effective?

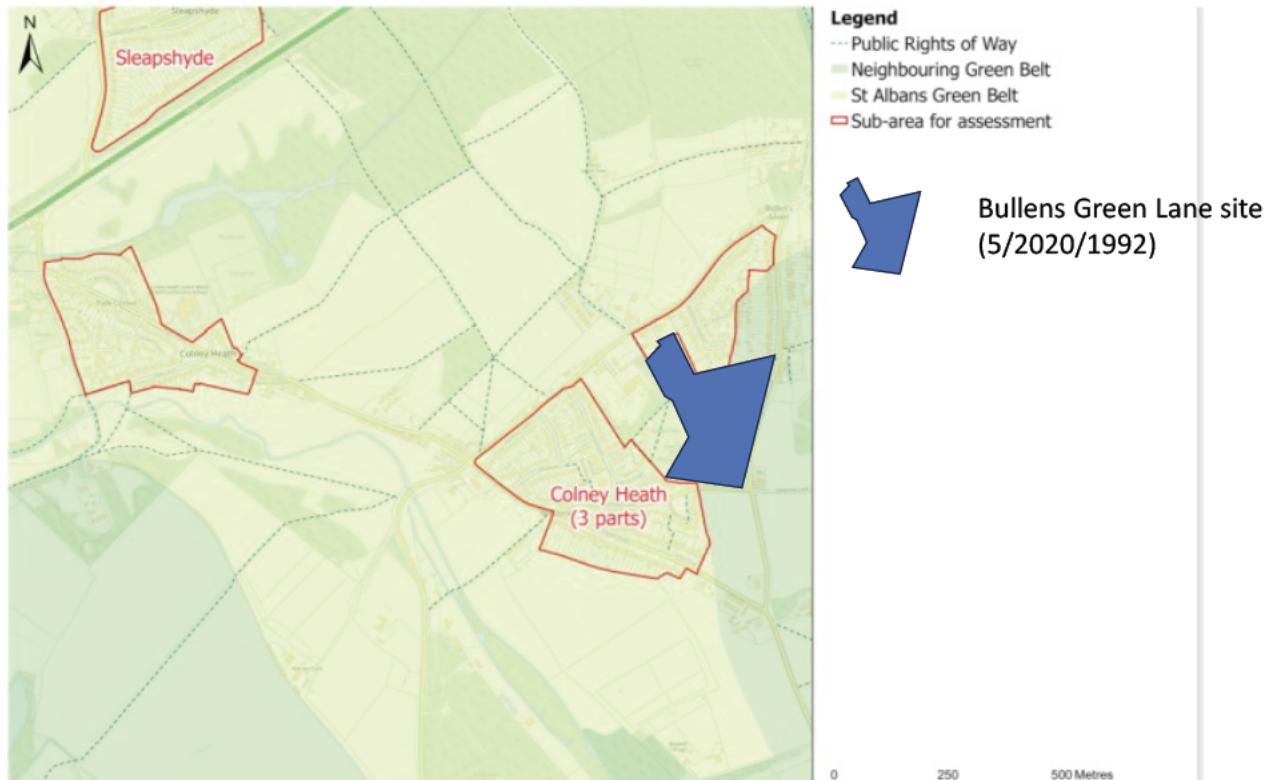
The Arup Green Belt review has a number of flaws especially around Colney Heath. Colney Heath is shown as a washed over village with three separate areas (refer Figure 1). This does not reflect actual conditions now. It is submitted that much of Colney Heath should be removed from the Green Belt and the “washed over” status removed.

Figure 1 Washed over areas of Colney Heath (source: Arup Green Belt Review, Washed over villages, p9)



The Arup Green Belt Review was undertaken without taking cognisance of the fact that a large housing scheme for 100 homes (Bullens Green Lane) had been approved in the village. A fairer assessment of the area at the time of the study is set out in Figure 2

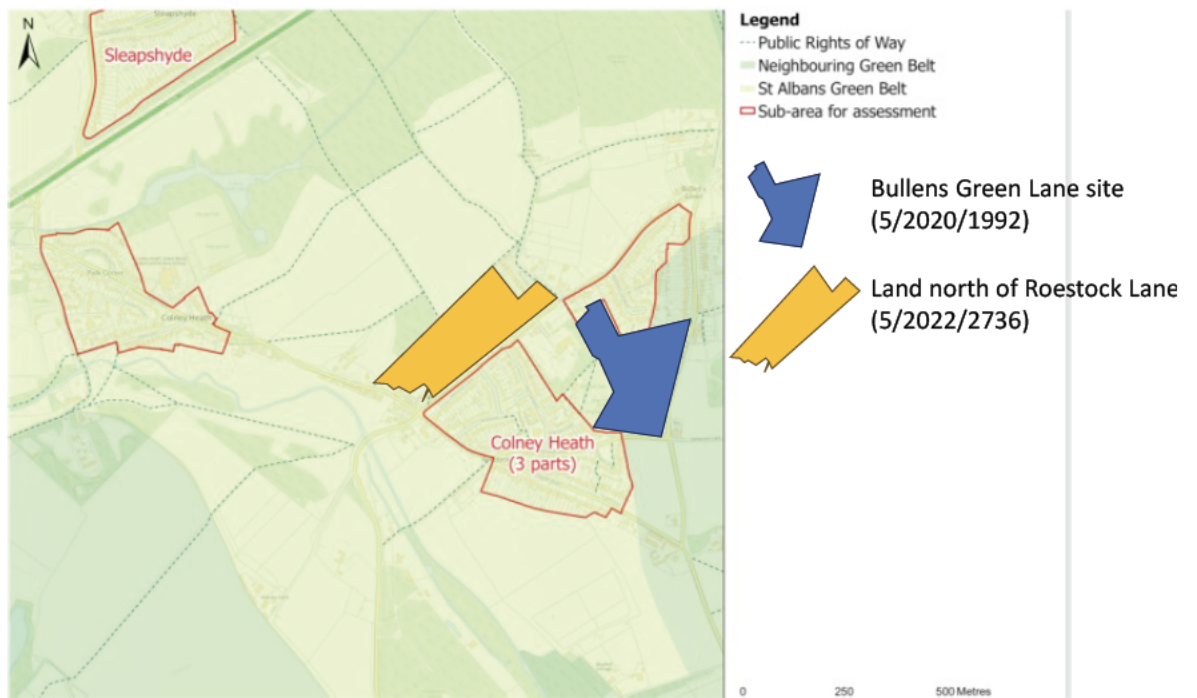
Figure 2 Actual amount of built out areas or approved schemes in Colney Heath at time of Arup Green Belt study



However, such is the tardiness of the council in getting its Local Plan ready that other major schemes have been approved in the village. A truer picture of the amount of approved major new development in the pipeline is shown at Figure 3 overleaf which includes a scheme on land north of Round House Farm Roestock Lane which has been approved at Planning Committee subject to a s106 agreement being signed. Effectively two of the distinct parts of the village have joined up with one another.

We submit that the washed over status of the village makes no planning sense in this context.

Figure 3 Actual amount of built out areas and schemes in Colney Heath approved (2025)



Matter 6 – Hemel Garden Communities ('HGC')

We wish only to offer broadbrush comments on this major project.

The council's spatial strategy risks putting "too many eggs in one basket" because of its reliance on so many homes and jobs at this location. The new housing will not be delivered until well into the 2030s and, most importantly, no public sector body has taken responsibility for underwriting the substantial transport infrastructure needed to release this site.

SADC/ED76B shows that the challenges for Junction 8 of the M1 could be addressed by means of a new overbridge. Various bodies have committed to fund the design of the project¹ but not to deliver it or underwrite its. This is critical. There are no public costings available for this infrastructure. The Tandridge Local Plan was found unsound in part for this very reason as it sought improved links onto the M25.

The Infrastructure Delivery Plan has not been updated to record the proposed change in how this critical new piece of infrastructure will be delivered or its costs. Thus, the inspectors do not know if the whole of the Local Plan is viable and if this allocation is going to be able to deliver all the other infrastructure and affordable housing the district needs and the proposed site allocation policies direct developers to provide on or off site.

We draw the inspectors' attention further to the point made in SADC/ED76B that this transport solution will only be feasible if the employment forecast for the site (during the plan period) is reduced to 4,000 jobs from the earlier plan for 8,000 jobs². We submit that the council has made an assertion about likely job generation without rigorous evidence to support this. We remind the inspectors that the site allocation is for 53 ha of employment land and that it will largely remain a high tech business park and, further, that the HGC project is planned to be built out until 2050, that is planned to generate 10,000 new jobs³. Thus, the transport solution needs to be in place to suit a development project that will run long after the Local Plan period. The point to ask the council is whether the overbridge will be sufficient for the whole of the HGC project.

¹ <https://www.hertfordshirefutures.co.uk/hf-projects/infrastructure/m1-junction-8/>

² Refer bullet point 4 of page 2

³ <https://www.hertfordshirefutures.co.uk/hf-projects/infrastructure/m1-junction-8/>

The council has stated that it will continue to work with its Duty to Cooperate partners (Hertfordshire and Highways England) on this matter in anticipation of the Stage 2 hearings. It is for the inspectors to determine if the council is inappropriately engaging in Duty to Cooperate activity after the Local Plan has been submitted for examination.

Matter 7 – Residential Site Allocations

More sites need to be brought forward to meet the higher housing requirement associated with a Local Plan on which work started in 2021 and to address other defects such as the over reliance on HGC and the lack of gypsy and traveller accommodation. We have submitted various sites on behalf of our clients that would be suitable for bricks and mortar housing.

We would be happy to respond to a fresh call for sites to this effect.

Matter 9 – Housing Land Supply

Issue 1 – Total Land Supply

Q2 What is the windfall allowance based on and is it justified?

Issue 2 – Five-Year Housing Land Supply

Q5 What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by the Framework?

The windfall element in the trajectory of the draft Local Plan (refer Table 3.2) is 13% of total supply. This seems optimistically high in a district that has run out of prior approval sites, has very limited urban supply and has used Article 4 directions to prevent the loss of its office stock. Its current windfall position of getting more housing supply achieved on appeal on Green Belt land will dry up if and when a new Local Plan is adopted.

Yours faithfully



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For and on behalf of Studio LK Ltd.