

# **Examination of the St Albans City and District Local Plan - Stage 1 Hearing Sessions**

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## **Hearing Statement – Matter 2**

Prepared on behalf of the Success Property Consortium



## Revision Schedule

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
0	Final	JK	10/04/25	JK	10/04/25	FP	10/04/25

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## Matter 2 - Housing Growth & Spatial Strategy

The Success Property Consortium (SPC) set out below their responses to the questions raised by the Inspectors. The responses are set out in the order they appear in the Inspectors' MIQs. The Inspectors should assume that no comment is made by the SPC in respect of the questions that have are not included below.

### 2.1 Issue 1 – Local Housing Need

#### 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?*

#### Response:

The previous standard methodology the minimum number of homes needed in St Albans is 885 dpa, resulting in a total need of 14,603 homes over plan-period. The most up-to-date standard methodology figure is 1,660 dpa (as of 12<sup>th</sup> December 2024).

If the Draft Local Plan is deemed to be 'sound' by the Inspectors, the SPC would expect this is on the basis that the Council agrees immediately to review its housing delivery sites position and identifies additional sites to meet the new housing target set out in the latest Standard Methodology and as required by paragraph 236 of the NPPF (December 2024).

### 2.2 Issue 2 – The Housing Requirement

#### Question 1:

*In response to the Inspectors' Initial Questions, the Council states that a stepped housing requirement is justified to allow sufficient time for the significant uplift in housing delivery to be realistically delivered. The stepped requirement is proposed as 485 dwellings per annum for the first 5 years post adoption of the Plan, rising to 1,255 dwellings per annum in years 6-10.*

*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?*

#### Response:

Delivery in the first five-years of the plan is expected to be approximately 2,491 homes, compared to the 4,425 homes that are required by the previous Standard Methodology over that period.

The SPC considers that the Council could have identified more sites in the Green Belt to increase its housing delivery within the first five-years of the housing trajectory, particularly as the Council has a history of under-delivery.. The Council has been notified of sites that are available and deliverable during the first five-year period in the trajectory, including the SPC's site (land at Lye Lane) but has chosen not to progress these sites.

Notwithstanding the above, the Council and Inspectors have an opportunity to help address this very low delivery rate by:

- Discussing the merits of the SPC's site at the 2<sup>nd</sup> set of Hearing Sessions. The SPC's site could come forward as an Inspectors' recommended main modification; and /or
- The Inspectors requiring the Council to immediately review its housing delivery sites position and identifies additional sites to:
  - Address its very low delivery rate for the first five-years of the plan; and
  - Meet the new housing target set out in the latest Standard Methodology and as required by paragraph 236 of the NPPF (December 2024).

## 2.3 Issue 3 – Settlement Hierarchy

### Question 2:

*Are the scores used in the settlement hierarchy assessment accurate and robust?*

### Response:

The score for the settlement of Chiswell Green are not accurate.

The Settlement Hierarchy (Part 1) (*LPCD 13.01*) places Chiswell Green as a Tier 5 (Medium Sized Village) settlement. However, the settlement hierarchy does not fully consider that Chiswell Green:

- Benefits from access to public transport and other local services and facilities that are normally associated with a Tier 1 settlement;
- Is located on the edge of St Albans City and is within 2.5 miles of its city centre and its facilities and services. In essence, Chiswell Green is an extension of St Albans (a Tier 1 settlement), similar to Batford / Southdown / West Common being an extension to Harpenden but regarded to be part of Harpenden for the purposes of the settlement hierarchy; and
- When comparing the land around Chiswell Green to some of the Tier 1 to 5 site allocations included in Part B (Site Allocation) of the Draft Local Plan, it is evidently more accessible with a wider range of services and facilities than some of those sites put forward for housing development in Part B of the Draft Local Plan (*LPCD 02.02*).

Table 6 (Settlement Hierarchy Scores) of the Settlement Hierarchy Study (Part 1) (*LPCD 13.01*) has given Chiswell Green a score of 9.3. However, this score should be much higher for the following reasons:

- The bus route score (1) on pages 46 and 47 only indicates that one bus route is accessible to Chiswell Green residents. There are in fact three bus routes (no's 321, 361 and 724) accessible to Chiswell Green;
- The train station score (0) on pages 48 and 49 does not reflect the fact that:
  - How Wood railway station and Park Street railway station are within a 10-minute walk or 2-minute cycle away [some of the Tier 3 and 4 settlements do not have access to a rail station at all – London Colney, Redbourn, Wheathampstead]; and
  - Residents have access to St Albans City station which is a 15-minute cycle ride or a 10-minute bus ride away.

- There are existing Public Rights of Way (PROW) walking routes in the vicinity of the Chiswell Green, including no's 82, 80, 21, 39 and 28;
- The supermarket score (0) on pages 50 and 51 does not reflect the fact that there is a co-op supermarket located within Chiswell Green and residents have access to supermarket facilities located on the west side of St Albans (Sainsburys and Lidl at the Abbey View Retail Park) which is a 25 minute walk or 10-minute cycle ride away or 5-minute bus ride away [this is assuming that the residents will not be ordering their shopping on-line];
- The leisure centre score (0) on page 50 does not reflect the fact that residents of Chiswell Green have access to Westminster Lodge Leisure Centre located on the west side of St Albans which is a 25 minute walk or 10-minute cycle ride away or 5-minute bus ride away. Residents also have access to Watford Leisure Centre;
- There are eight GP practices located within a 4km radius of Chiswell Green and a further two GP practices located just beyond a 4km radius, in London Colney;
- St Albans City Hospital is also located less than 4km to the north of Chiswell Green;
- There are public open spaces within proximity to Chiswell Green, including allotments, playing fields, public parks, play space and religious grounds. In terms of the public open spaces with play facilities, these include:
  - Playing fields at Cherry Hill and Mayflower Road which are within 500m;
  - Greenwood Park allotments; and
  - Four existing play areas within 900m, one of which (Greenwood Park Play Area) has an extensive provision of play equipment for children up to the age of 14 years, with a new range of play equipment for children under 6 years installed in 2019.
- Chiswell Green benefits from access to the M25 motorway which makes it very attractive for commuters and to commercial floorspace (last mile) distribution operators.

Maps illustrating the location of Chiswell Green in comparison to the above are attached as **Appendix A**.

Notwithstanding where Chiswell Green is positioned within the settlement hierarchy, it is a location that can and should accommodate more homes and employment floorspace because of its high level of access to transport facilities and local services. Additional housing sites should not be rejected in this location because it is a lower tier settlement (with less population). The Council should be identifying land around Chiswell Green for housing and employment purpose in Part B (Site Allocations) of the Draft Local Plan. It is a highly accessible location with a wider range of services and facilities locally and benefits from access to other services located within a Tier 1 settlement.

One such site that can come forward now is being promoted by the SPC at Lye Lane in Chiswell Green. Representations were submitted to the Council on 7<sup>th</sup> November and can be found under representation reference number 225 on pages 1239 to 1245 of the 'St Albans Draft Local Plan 2041 Regulation 19 Publication by Submission Report' (LPCD 20.03). The SPC are expecting to debate the merits of this site at the 2<sup>nd</sup> set of Hearing Sessions. However, Chiswell Green can, and should, accommodate more homes on its fringes.

The SPC suggest that the solution to the situation is for the Inspectors to re-position Chiswell Green higher up in the settlement tiering system in the Draft Local Plan and to identify the SPC's Lye Lane

site for housing and employment purposes. These amendments to the Draft Local Plan could be secured by way of the Inspectors' recommended modifications.

Question 3:

*How have the scores and baseline evidence been used to determine which settlements fall within the proposed tiers? Is the settlement hierarchy justified, effective and sound?*

Response:

In the SPC's opinion, subject to the adjustments as set out in the SPC's response to 2.3 Issue 3, question 2 (above), the settlement hierarchy can be justified and can be made effective and sound. These adjustments could be secured by way of the Inspectors' recommended modifications.

## **2.4 Issue 4 – Distribution of Growth**

Question 1:

*Policy SP1 states that the Settlement Hierarchy provides the basis for the allocation and location of growth, locating most growth generally within and adjacent to the larger and most sustainable urban centres in Tiers 1-3 (St Albans and Hemel Hempstead, Harpenden and London Colney).*

*How does the distribution of housing growth compare with the settlement hierarchy over the plan period, taking into account completions, commitments and sites identified in the Local Plan? Does the spatial strategy reflect the size, role and function of settlements in Policy SP1?*

Response:

In the SPC's opinion, from an existing situation perspective (assuming status quo is best) the spatial strategy does generally reflect the size, role and function of all of the settlements in Policy SP1.

From a future growth perspective and taking opportunities to better utilise infrastructure, to continue to maintain the role and function of Chiswell Green as is (status quo) is a wasted opportunity.

When considering the close proximity of Chiswell Green to How Wood and Park Street stations (via walking or cycling) and St Albans City Station (via bus or cycling), its level of bus service, its local infrastructure provision and its proximity to the M25 and the wider road network, this settlement could perform a greater future role and function in meeting the District's housing and employment floorspace needs. As such, this would mean adjusting the status quo. This adjustment, as set out in the SPC's response to 2.3 Issue 3, question 2 (above), can help the District meet its needs and could be secured by way of the Inspectors' recommended modifications.

## **2.5 Issue 5 – Site Selection Methodology**

*The Local Plan Site Selection – Proforma Methodology Paper (September 2024) (LPSS 02.02) describes the process used by the Council to allocate sites in the Plan. The starting point is the Housing and Economic Land Availability Assessment ('HELAA'). The Methodology Paper states that out of 678 housing sites, the HELAA identified 566 sites to progress to the next stage.*

Question 2:

*The Methodology Paper then states that “a more spatially focussed piece of work” was carried out by applying a buffer around each settlement inset from the Green Belt to assist in “encouraging a sustainable pattern of development”.*

*Were all sites beyond the ‘buffers’ discounted at this stage? Is this a justified and effective approach to site selection?*

Response:

The SPC is concerned about the approach adopted by the Council to site selection. In particular, the information used in the scores given to the SPC’s site (Ref: C-249 [HELAA Ref: STS-67-21] on the relevant Proforma Sheet (page 41, Part 2)) (LPSS 02.11) and the subsequent conclusion reached by the Council – ‘not recommended to progress’. For example, in the document titled ‘Green Belt Buffer Sites Not Recommended – Part 2’ (September 2024) (LPSS 02.11) a large number of ‘weak’ scores given to the SPC’s site are unfair and unjustified, as explained below:

- The site is man-made contaminated land and, contrary to the information contained in the proforma, should not be regarded to benefit from an Agricultural Land Classification (ALC);
- Development on the site would offer further benefits which have not been considered to by the Council, such as helping to:
  - Protect other features that are close to the site (ancient woodlands, county wildlife site, traditional orchard and deciduous woodland priority habitat); and
  - Deliver access improvements along Lye Lane; and
  - De-contamination of the site before it has any impact on the Source Protection Zone.
- The site could accommodate new commercial (last-mile) floorspace to meet the demand for industrial, storage and distribution uses up to 2041 based around accessible junctions of the M25. The South West Hertfordshire Economic Study (Sept 2024) (EMP 01.01) demonstrates that the supply of land for industrial, storage and distribution uses is insufficient (by approx. 9 ha) to fully meet the additional 58.9ha need identified for the period up to 2041. This conclusion is contrary to that stated by the Council in Policy SP5 (Employment and the Local Economy) of the Draft Local Plan which implies there is an oversupply of employment land;
- The future occupiers of the site benefits from more convenient access to local infrastructure than the scoring suggests and should have secured much higher scoring (for example (distance to local/town/village centre; bus stop; branch line rail railway station should have scored strongly). When considering the increased accessibility achieved by cycling, using bus services and rail services, the score given for distance to other infrastructure (schools, GP surgery, town centres) should also have scored strongly.

Notwithstanding the above, the Council and Inspectors have an opportunity to help address this unfair and unjustified scoring by:

- Discussing the merits of the SPC’s site at the 2<sup>nd</sup> set of Hearing Sessions. The SPC’s site could come forward as an Inspectors’ recommended main modification; and /or

- The Inspectors requiring the Council to immediately review its housing and employment delivery sites position and identifies additional sites to:
  - meet the new housing target set out in the latest Standard Methodology and as required by paragraph 236 of the NPPF (December 2024); and
  - meet the identified employment land need set out in the South West Hertfordshire Economic Study (Sept 2024) (EMP 01.01).

Question 3:

*Proformas were then used to analyse each site against a “sustainable development potential”, taking into account the Green Belt Study and major policy and environmental constraints. Accessibility was determined by measuring distances to key infrastructure and services.*

*What was the justification for using distances when determining accessibility? How were other factors taken into account such as the ability to access services and facilities by walking, cycling and public transport?*

Response:

In the SPC’s opinion, other factors such as walking cycling and public transport have not been fully taken into account, as explained in the SPC’s response to 2.5 Issue 5, question 2, immediately above.

Question 6:

*The Methodology Paper highlights that some sites that were not recommended for further consideration by the Green Belt Stage 2 assessment were still recommended to progress by the proformas. Reasons included their location next to a Tier 1 or Tier 2 settlement and potential to deliver sustainable development.*

*What was the justification for this approach, and why did it differ from potentially sustainable development proposals in other Tiers of the hierarchy?*

Response:

In the SPC’s opinion, additional housing and employment sites should not be automatically rejected because they are located around lower tier settlements. The Council should be identifying land around these settlements if they are accessible and in a sustainable location with access to a range of services and facilities locally and benefits from access to other services located within a Tier 1 and/or 2 settlement.

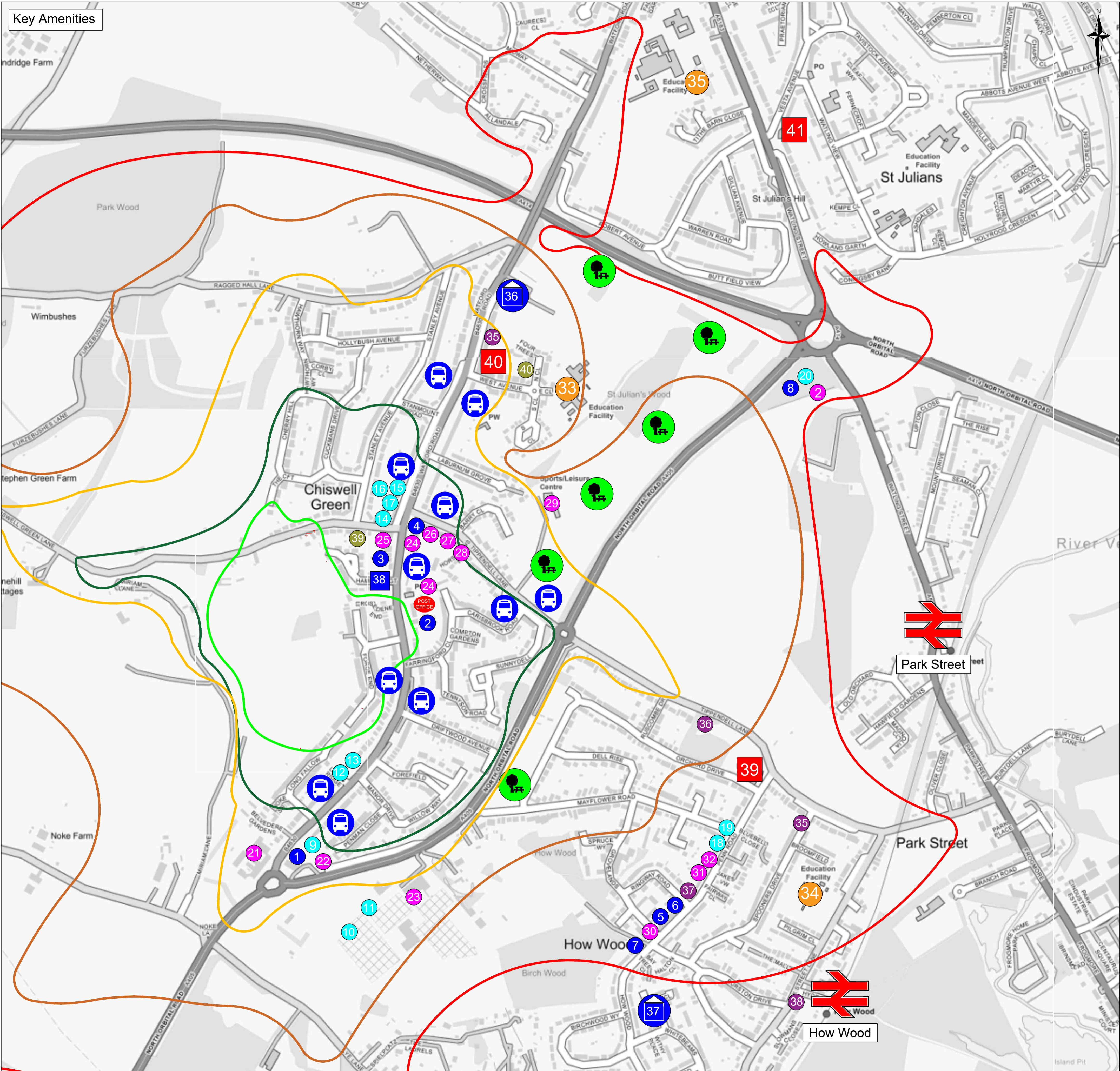
One such site is being promoted by the SPC at Lye Lane in Chiswell Green. Representations were submitted to the Council on 7<sup>th</sup> November and can be found under representation reference number 225 on pages 1239 to 1245 of the ‘St Albans Draft Local Plan 2041 Regulation 19 Publication by Submission Report’ (LPCD 20.03). The SPC are expecting to debate the merits of this site at the 2<sup>nd</sup> set of Hearing Sessions.

**End**

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## **Appendix A - Maps illustrating the location of Chiswell Green in relation to local infrastructure**





**Convenience Store:**

- 1 Little Waitrose
- 2 Foodfare Convenience Store
- 3 Co-op Food
- 4 Chiswell Green Local Store
- 5 The Co-Operative Food
- 6 The Bok and Rose South African Shop
- 7 Moonlight
- 8 M&S Food

**Retail:**

- 9 Shell Gas Station
- 10 Burston Garden Centre
- 11 Hertfordshire Fisheries
- 12 Ride St Albans Bicycle Shop
- 13 JMB Motorspor
- 14 Hire One Hardware Store
- 15 Globe Pharmacy
- 16 Chiswell Fireplaces
- 17 KC Flooring Specialists
- 18 How Wood Pharmacy
- 19 Lily Alley Florist
- 20 BP Gas Station

**Hospitality:**

- 21 The Noke Restaraunt
- 22 Starbucks Coffee
- 23 Burston Restaurant
- 24 Gracey's Pizza
- 25 The Three Hammers Public House
- 26 Flamelight
- 27 The Rami Tandori
- 28 Simmons Bakers
- 29 Lazy Llama Cafe
- 30 The Village Spice
- 31 Sea World
- 32 Simmons Bakers

**Education:**

- 33 Killigrew Primary and Nursery School
- 34 How Wood Primary School and Nursery
- 35 The Marlborough Science Academy

**GP:**

- 36 Midway Surgery
- 37 Park Street Surgery

**Dentist:**

- 38 UK Dental Specialists

**Religious Facilities:**

- 39 Park Street Baptist Church
- 40 Green Wood United Reformed Church
- 41 St Bartholomew Church

**Beauty:**

- 35 Greenwood Natural Therapies
- 36 Indigo Beauty Room
- 37 The Sun Set
- 38 The Anti Ageing Clinic

**Pet Store:**

- 39 Walkalot
- 40 Your Pet Concierge

**NOTES**

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**Key:**

- Site Boundary
- Train Station
- Bus Stop
- Shop
- Retail
- Hospitality
- Education
- GP
- Dentist
- Churches
- Beauty Salon
- Pet Store
- Park - Recreation
- Post Office

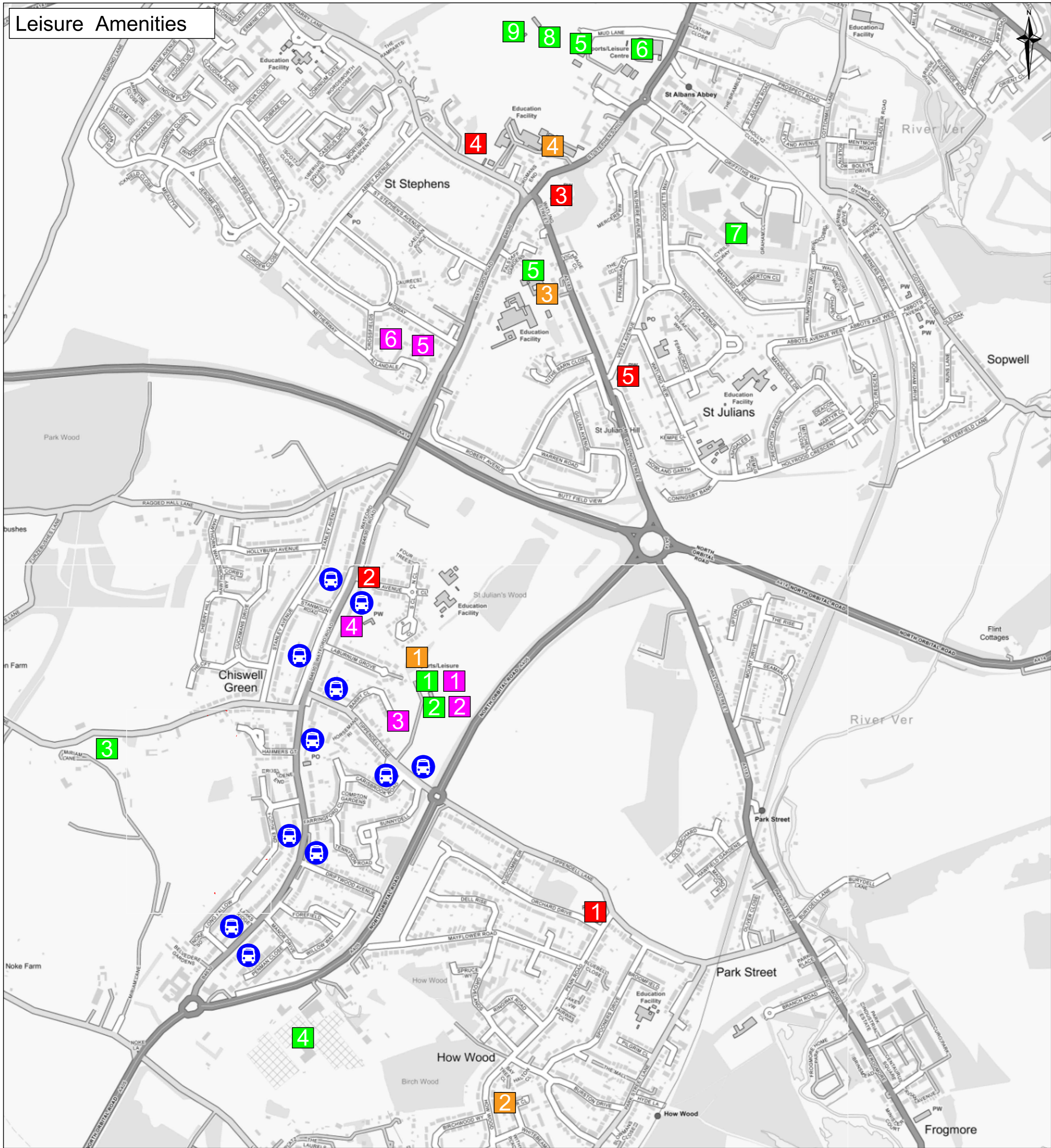
**Walking Distance:**

- 0-5min walk (0-400m)
- 5-10min walk (400-800m)
- 10-15min walk (800-1200m)
- 15-20min walk (1200-1600m)
- 20-25min walk (1600-2000m)

**Rev**

Rev	Description	Date	Chkd
1	3 Grovelands Business Centre Boundary Way Hemel Hempstead Tel: (01442) 535999 Fax: (01442) 254894 postbox@glanvillegroup.com www.glanvillegroup.com		
2	Client: CALA HOMES (CHILTERN) & REDINGTON CAPITAL		
3	Project: LAND SOUTH OF CHISWELL GREEN LANE		
4	Title: LOCAL AMENITIES		
5	Project Engineer: DK Scale: NTS		
6	Project Director: AHJ Date: MARCH 2023		
7	Status:		

Drawing No. Fig AHJ\_1 Rev 11



**Religious Facilities:**

- 1. Park Street Baptist Church
- 2. Green Wood United Reformed Church
- 3. St. Stephen's Church
- 4. St Bartholomew Church
- 5. Brothers of the Sacred Hearth

**Sports Clubs and Facilities:**

- 1. Greenwood Park Lawn Tennis Club
- 2. Spirit TKD ( ITF Taekwon-Do):
- 3. Chiswell Green Livery Yard and Riding School
- 4. CrossFit Verulamium
- 5. St Albans & Potters Bar Karate (Tiska)
- 6. Harpenden Badminton Club
- 7. Everyone Active Gym and Spa Westminster Lodge
- 8. PureGym St Albans
- 7. St Albans Athletics Club
- 8. Athena Ladies Running Club

**Local Groups and Communities:**

- 1. Greenwood Park Community Centre
- 2. Chiswell Green Third Age Trust U3A
- 3. Grow Chiswell Green
- 4. Soroptimist St Albans and District
- 5. Verulam Explorer Scout Unit
- 6. 1st St Albans Scout Group

**Classes and Extracurricular Activities:**

- 1. Salsa Mish
- 2. Booster Cushion Theatre
- 3. VAKs | St Albans Tutors
- 4. Abbey Theatre

**Key:**

- Site Boundary
- Bus Stop
- Religious Facilities
- Sports Club and Facilities
- Local Groups and Communities
- Classes and Extracurricular Activities

**NOTES**

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Rev	Description	Date	Chkd
1	Issue for Construction	15/03/2023	AKJ

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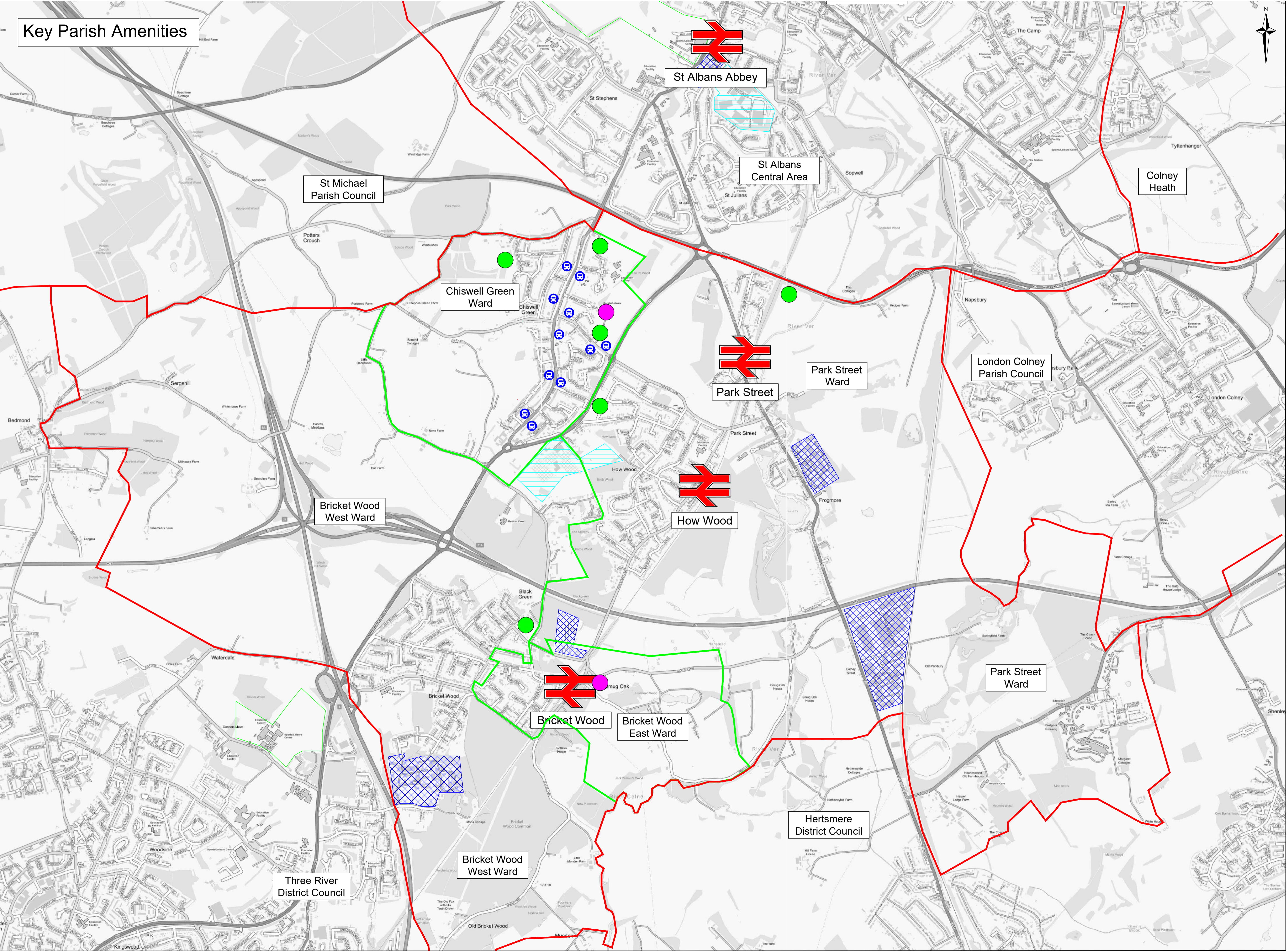
Client : CALA HOMES (CHILTERN) & REDINGTON CAPITAL

Project : LAND SOUTH OF CHISWELL GREEN LANE

Title : LEISURE AMENITIES

Project Engineer : DK Scale : NTS  
Project Director : AHJ Date : MARCH 2023  
Status :

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Key Parish Amenities

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**Key:**

- Proposed Site Location
- Bus Stop
- Train Station
- Parish Boundary
- Ward Boundary
- Employment Area
- Retail Area
- Leisure Area
- Community Centre
- Children's Play Areas

Rev.	Description	Date	Chkd

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3 Grovelands Business Centre  
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Client: CALA HOMES (CHILTERN) & REDINGTON CAPITAL

Project: LAND SOUTH OF CHISWELL GREEN LANE

Title: PARISH AMENITIES

Project Engineer: DK Scale: NTS  
Project Director: AHJ Date: MARCH 2023

Status:  

Drawing No. Fig\_AHJ\_3 Rev 11

# Bus Services

This map illustrates the bus services in St Albans, specifically routes 321, 361, and 724. The routes are highlighted in purple. Key locations marked on the map include St Albans Abbey, St Albans City, and St Albans Park. The River Ver is also shown. The map includes various landmarks and residential areas, providing a comprehensive overview of the bus network in the region.

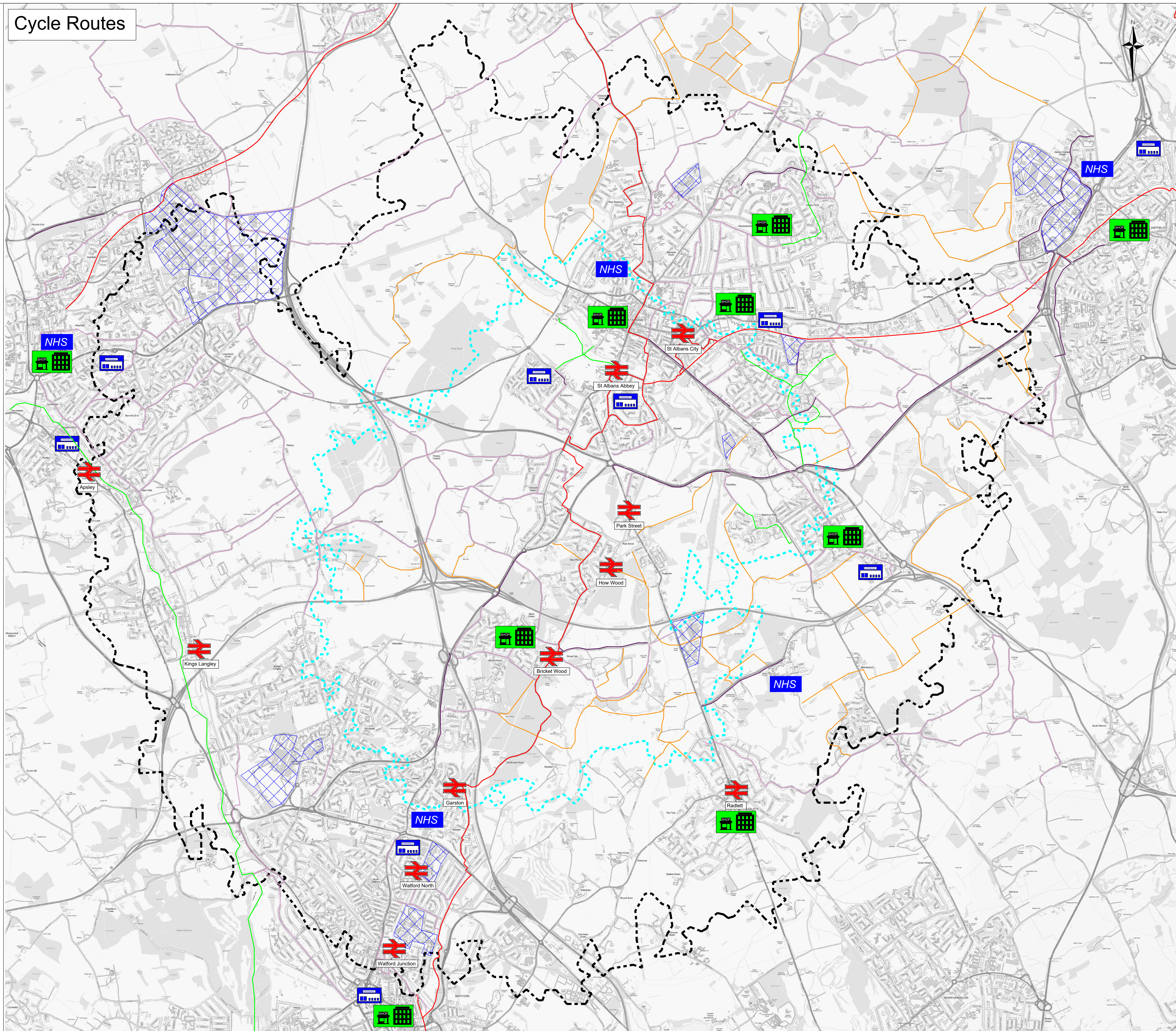
- Key:

-  Proposed Site Location
-  Bus Routes
-  Bus Stop
-  Train Station
-  Average Bus Journey Time Isochrone (39min)
-  Employment Area
-  Hospital
-  Town Centre
-  Supermarkets

No. SERVICE		DESTINATION	FIRST/LAST SERVICE	FREQUENCY	
				AM PEAK	PM PEAK
321	Luton - St Albans - Watford - Rickmansworth	Luton/St Albans	05:58/23:25	3 Buses	3 Buses
		Watford/Rickmansworth	05:56/23:23	3 Buses	3 Buses
361	Garston - St Albans	St Albans	07:51/16:58	1 Bus	1 Bus
		Garston	08:51/17:32	1 Bus	1 Bus
724 <sup>+</sup>	Harlow - St Albans - Watford - Heathrow Airport	Watford/Heathrow Airport	05:12/22:01 <sup>**</sup>	1 Bus	1 Bus
		St Albans/Harlow	06:27/23:49 <sup>***</sup>	1 Bus	1 Bus

DESTINATION	JOURNEY TIME (min)
How Wood Train Station	27
St Albans Train Station	29
Watford Junction Train Station	40
St Albans City Centre	20
Watford City Centre	43
St Albans Hospital	44
Watford General Hospital	59
Brick Knoll Business Park	48
Porters Wood Business Park	45
Hemel Hempstead Maylands	71
North Watford Business Park	34

# Cycle Routes



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**Key:**

- Proposed Site Location
- Indicative Cycle Isochrone (5km/20min)
- Indicative Cycle Isochrone (10km/40min)
- Train Station
- Employment Area
- Hospital
- Town Centre
- Supermarkets

**Cycling routes:**

- National Cycle Routes
- Shared with Pedestrians
- Traffic Free Route
- Bridleway/Track / Other
- Routes Suggested by Local Cyclists

Rev	Description	Date	Chkd

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Client: CALA HOMES (CHILTERN) & REDINGTON CAPITAL

Project: LAND SOUTH OF CHISWELL GREEN LANE

Title: CYCLE ISOCHRONES

Project Engineer: DK Scale: NTS  
Project Director: AHJ Date: MARCH 2023  
Status:  

Drawing No. Fig AHJ\_7 Rev 11

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