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St Albans City and District Local Plan Examination – Hearing Statement to Stage 1

St Albans Local Plan - Stage 1 Hearing Statement

Contents

1. Introduction

1.1. We are instructed by the following, to submit a Hearing Statement in response to the Stage 1 of the St Albans City and District Local Plan:

- Smallford Business Park Ltd. (hereafter SBP) who are promoting land at Smallford Works, Smallford Lane, St Albans, AL4 0SA; and
- Hemel Business Park Ltd. (hereafter HBP), who own and are promoting land at Appspond Lane, St Albans, Hertfordshire.

1.2. Both HBP and SBP submitted representations to the Regulation 19 consultation in November 2024, and this hearing statement (submitted by Savills on behalf of both parties) provides additional comment regarding specific questions raised by the Inspectors in their Matters, Issues and Questions document for Stage 1 of the Local Plan hearings, dated 17 March 2025.

1.3. This Statement provides a response to the following questions:

- **Matter 2 – Housing Growth and Spatial Strategy**
  - *Issue 1 – Local Housing Need*
    - Question 1 – What is the plan period for the submitted St Albans Local Plan? Is this sufficiently clear to users of the Plan?
    - 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?
    - Question 3 - With regard to a case for a higher housing requirement, do any of these circumstances apply to St Albans?
  - *Issue 5 – Site Selection Methodology*
    - Question 8 – Was the site selection process robust? Was appropriate selection of potential sites assessed, and were appropriate criteria taken into account?
- **Matter 3 – Green Belt**
  - *Issue 2 – Green Belt Review*
    - Question 1 - How does the methodology in the 2023 Stage 2 Green Belt Review differ from the earlier studies in 2013 and 2014 referenced above?
    - Question 2 - How were the areas selected for assessment in the Stage 2 Green Belt Review and what are they based on? How do the areas differ from previous assessments of the Green Belt?
    - Question 9 – Aside from sites proposed for development, are any other alterations proposed and/or considered necessary to the existing Green Belt boundary?
  - *Issue 3 – Exceptional Circumstances*
    - Question 1 – Do exceptional circumstances exist to alter the Green Belt boundary in St Albans and has this been fully evidenced and justified as part of the plan-making process.

1.3.1. SBP and HBP reserve the right to submit Hearing Statements to subsequent Stages of the Local Plan Examination, as well as to attend future hearing sessions, particularly those relating to employment.

2. Matter 2 – Housing Growth and Spatial Strategy

2.1. Issue 1 – Local Housing Need

Question 1 – What is the plan period for the submitted St Albans Local Plan? Is this sufficiently clear to users of the Plan?

2.1.1. The Plan Period is not sufficiently clear to users of the Plan, in particular 'Year 1' which covers only a six month period from October 2024 to March 2025. The Plan Period is from October 2024 to March 2041, but this is not laid out with sufficient clarity.

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?

2.1.2. Under the latest Standard Method relevant to the 2023 NPPF under which the Plan is being examined, the housing requirement is 885 units per year. Over a Plan Period of 16.5 years this is a total requirement of 14,603. This is set out in Strategic Policy SP1.

Question 3 – With regard to a case for a higher housing requirement, do any of these circumstances apply to St Albans?

2.1.3. There is a clear case for a higher housing requirement in St Albans. The Regulation 18 draft of the Plan prepared for 888 units per year, delivered over 17 years (a total of 15,066 dwellings over the Plan period). This is 463 more dwellings than the Regulation 19 figure of 14,603.

2.1.4. This reduction to the Plan's supply has been achieved by lowering the indicative capacity of draft housing allocations. There is nothing in the evidence base to suggest that this reduction has been driven by revised sustainability appraisals, nor any other evidence-based site assessments. There is clearly scope to increase the amount of housing the Plan can provide on the existing draft allocations.

2.1.5. It is clearly the case that St Albans can plan for more housing, as the Regulation 18 Plan did precisely this in 2023. To reduce site capacity is contrary to the key requirement that Plans are positively prepared, as per paragraph 35 of the 2023 NPPF.

2.1.6. The scope to increase the supply of housing under the Plan's strategy should also factor in the point that some allocated sites, such as Smallford Works which is allocated for 58 dwellings, will not be coming forward for housing. Considering the existing open storage use on the site, it is being promoted for industrial uses alone.

2.2. Issue 5 – Site Selection Methodology

Question 8 – Was the site selection process robust? Was appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

2.2.1.   The site selection process was not robust. As set out in consultation responses to both the Regulation 18 and Regulation 19 process, Smallford Works is being actively promoted for employment use only. There is no prospect of residential development coming forward on the site, partly due to existing established uses for open storage on the site with a number of long term tenants.

2.2.2.   Despite this, the Smallford Works has been allocated for residential development, with an indicative capacity of 58 dwellings. SPB support the Plan's identification of the site for development, but objects to this being a for residential use. Appropriate criteria in assessing the sites, such as the fact Smallford Works is in existing open storage use, appear to have been absent.

2.2.3.   The fact that a site being promoted for employment has been allocated for residential development, despite that fact that residential development on the site will not be forthcoming, is evidence that the site selection process was not robust.

3. Matter 3 – The Green Belt

3.1. Issue 2 – Green Belt Review

Question 1 – How does the methodology in the 2023 Stage 2 Green Belt Review differ from the earlier studies in 2013 and 2014 referenced above?

3.1.1. The latest evidence base does not provide a sufficiently detailed assessment of all Green Belt across St Albans City and District Council. The 2023 assessment is a Stage 2 Review, and looks at discrete parcels only. There is no overarching assessment as one would expect to find in a Stage 1 Assessment. As a result, certain highly sustainable Green Belt sites, such as Appspond Lane, are not considered.

3.1.2. Considering the scale of need for both housing and employment land (as set out in our Regulation 19 representations) a more thorough Green Belt Review is needed in order to ensure that St Albans is doing all within its power to identify sustainable sites.

3.1.3. Paragraph 147 of the 2023 NPPF states that 'where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed.' Appspond Lane is a previously developed site (as established by both the Council in determining a recent planning application (ref. ref. 5/22/1847), and the Inspector at appeal (ref. APP/B1930/W/24/3344506). Appspond Lane should therefore be included within any Green Belt assessment within St Albans.

3.1.4. The Stage 1 Review is over a decade old, and is considered significantly out of date, and therefore not an appropriate report on which to base subsequent Stage 2 assessment. The wider context within St Albans will have changed in the intervening period, and a more searching, granular Green Belt assessment is needed.

Question 2 – How were the areas selected for assessment in the Stage 2 Green Belt Review and what are they based on? How do the areas differ from previous assessments of the Green Belt?

3.1.5. The selection assessment has not been sufficiently robust. Stage 2 assessments usually look at discrete parcels of land that are poorly performing sites, and/or have been promoted in Call for Sites exercises.

3.1.6. Despite the fact that it is a poorly performing, previously developed site that has been actively promoted within the Local Plan process, Appspond Lane was not considered during the Stage 2 Green Belt Review process. It is recognised that the Green Belt review included sites promoted in Call for Sites exercises between 2016-2021, however through the Local Planning Authority relying on this information and not undertaking an independent assessment of known sites, including those such as Appspond Lane with planning history records available, this means the Local Planning Authority has not been robust in their assessment.

Question 9 – Aside from sites proposed for development, are any other alterations proposed and/or considered necessary to the existing Green Belt boundary?

3.1.7. As set out in our Regulation 19 representations, alteration to the existing Green Belt boundary is considered necessary to ensure that Land at Appspond Lane is removed from the Green Belt. This is a previously development site with an implemented planning permission. As set out in a Landscape and Visual Impact Assessment submitted as part of a planning appeal in 2024[1], Appspond Lane is of low sensitivity, performs poorly against Green Belt purposes, and 'plays a minimal role in openness beyond the site itself.' At appeal, with regards to the findings of the LVIA, the Inspector noted 'I have no reason to reach a contrary view.'[2]

3.2. Issue 3 – Exceptional Circumstances

Question 1 – Do exceptional circumstances exist to alter the Green Belt boundary in St Albans and has this been fully evidenced and justified as part of the plan-making process.

3.2.1. Exceptional circumstances do exist to alter the Green Belt boundary. As set out in our Regulation 19 representations, the Plan fails to identify supply to meet the employment need within St Albans over the Plan period, despite the fact that it claims to have a surplus. Green Belt release is therefore justified to increase the supply of employment land.

3.2.2. With regard to the Plan's undersupply of employment land, HBP and SBP will be submitting Hearings Statements to future stages of the Local Plan Examination, and reserve the right to attend at future hearings covering employment matters. As stated in our Regulation 19 representations, we have serious concerns about this aspect of the Plan.

3.2.3. However, the selection of sites for removal from the Green Belt must be informed by appropriate evidence. The Green Belt assessment fails to consider brownfield sites such as Appspond Lane, and for this reason the Plan's wider approach is not justified.

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[1] Planning ref. 5/22/1847. The application was submitted 20 July 2022. An LVIA, dated 16 May 2024, was later included as part of an appeal.
[2] Appeal Decision, ref. APP/B1930/W/24/3344506, para. 18

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