

By email to: planning.policy@stalbens.gov.uk

Local Plans team
St Albans City & District Council
Civic Centre
St Peter's Street
St Albans
Hertfordshire, AL1 3JE

21 August 2025
My Ref: 92/033

Dear sir/madam,

**RE: ST ALBANS LOCAL PLAN EXAMINATION 2025 – ADDITIONAL DOCUMENTS CONSULTATION
SADC/ED80A – SADC POSITION ON CHILTERN NATIONAL LANDSCAPE EXTENSION
SITE M14 – LAND AT BEESONEND LANE, HARPENDEN**

Thank you for the opportunity to comment on the additional documents published on 4 July 2025. I write in response to the Council's Position Statement on the cancellation of the proposed extension to the Chilterns National Landscape (ref SADC/ED80A). The Position Statement itself was a response to a statement we submitted in June 2025 (ref SADC/ED80B).

Jarvis Homes are promoting land at Beesonend Lane for residential development – a site that lies adjacent to the proposed site M14. The site outline is shown below.



Figure 1: annotated extract from LPSS 02.13
Green Belt Settlement Buffer Map

Legend

-  Local Authority Boundary
-  HELAA Site Boundary
-  Urban Settlement
-  Metropolitan Green Belt
-  Green Belt Study Recommended Area
-  Green Belt Study Settlement Buffer (250m)
-  Green Belt Study Settlement Buffer (400m)

Jarvis Homes supports the Council's proposal to reinstate site M14. This site was included as a housing allocation at Regulation 18 stage and only deleted due to concerns about the proposed extension of the National Landscape. Natural England has confirmed that this proposed extension is longer being progressed and the only sensible outcome is therefore for site M14 to be reinstated.

The reinstatement of site M14 brings into sharper focus the Council's exclusion of the site being promoted by Jarvis. The Council's Position Statement restates the reason for the exclusion of the site as the lack of support in the Green Belt Review. However, we have consistently maintained that the approach to assessing the Green Belt implications of this site was fundamentally flawed. There are no other technical issues that exclude the site, it is purely the outcome of the Green Belt Review.

We have made similar comments at Regulation 18 stage, Regulation 19 stage and most recently in our Examination Statement on Matter 3, Issue 2, Questions 1-3 submitted in April 2025.

By amalgamating the Jarvis site with a very large area of land far removed from Harpenden, the detailed Green Belt implications of the Jarvis site have been lost or obscured by irrelevant considerations. The Jarvis site makes up around 5% of parcel SA-12 and it is clear that the majority of the conclusions for SA-12 would not apply if just the Jarvis site is assessed.

Our detailed arguments are set out in our previous comments and are not repeated here. However, it is worth noting that the Council's previous Green Belt Review undertaken by SKM in 2013 did look at the Jarvis site specifically and concluded that it should be taken forward.

Aside from the Green Belt elements, the inclusion of the Jarvis site would increase the capacity of site M14 significantly. Previous proposals for the site have included around 60 retirement homes and a 66-bed care home. If conventional residential development is preferred, the 3.7ha site could accommodate 80-100 homes. In light of the Inspectors' evident concerns about the five-year housing land supply provided for by the draft Plan, an additional 100 homes would be a significant benefit.

In addition, the inclusion of the Jarvis site would enable a far more satisfactory access arrangement to site M14. It is not entirely clear how access to M14 is to be provided, but it is understood that one of the properties on The Deerings would be demolished to create a new access. While this is not unacceptable in itself, it is sub-optimal, given the loss of a dwelling (likely to be valued at around £2m). There could also be concerns about the likely junction spacing with Hawsley Road being below the Local Highway Authority guidelines and the loss of a number of mature street trees. Again, these issues are probably resolvable, but the arrangement is sub-optimal. The inclusion of the Jarvis site would enable a new access to be created to M14 through the Jarvis site without the loss of a dwelling.

In conclusion, Jarvis Homes support the reinstatement of site M14. However, the land to the west of M14 should also be included in the draft Plan.

We look forward to discussing these issues with the Inspectors at the forthcoming hearing session. If there are any questions in the meantime, please feel free to contact me.

Yours faithfully



Simon Andrews
Strategic Planning Manager