

St Albans City and District Local Plan

Site Sifting Process Addendum -July 2025 (SADC/ED81)

On behalf of

The Trustees of the GA Simons Family Settlement

Land, Comon Lane , Harpenden

Reg 19, Sub 69

This response to the above consultation should be considered alongside the submissions made on behalf of our clients to the Reg 18, Reg19 (Sub 69) , the Hearing Statement and the points raised at the Examination Hearing, where we raised with the Inspectors that the Council had provided no justification for the departure taken when assessing our clients land in the Green Belt Study.

Para 1.10 of the Addendum states “the process has been comprehensive, thorough and consistent”. Our clients take issue with this statement.

The Housing and Economic Land Availability Assessment 2021 of our clients land were identified as HT-06-16, HT-06a-21 and HT-06b-21 the Overall Conclusion of each was “The site is considered be potentially suitable, available and achievable subject to further assessments as part of the site selection process”.

The SADC Stage 2 Green Belt Review included and only considered our clients land within the wider SA-29, specifically it did not as in the HELAA review consider our clients sites independently in terms of its contribution to the Green Belt or whether these sites served the 5 purposes of the Green Belt . This is anomalous with and in contrast to the approach adopted for other sites and we refer to SA-38, SA-39, SA-34SA-15a, SA-14 as just a few examples. Had our clients site been considered as per the HELLA and Pro-Forma it would in our opinion have been found that it no longer performed any of the 5 purposes for including land in the Green Belt.

In the case of SA-32 the Green Belt Summary refers “Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released in isolation or in combination with SA-31 is unlikely to significantly harm the performance of the wider Green Belt”. Site SA-32 has been taken forward as a Green Belt release in the submitted Local Plan. Had the Green Belt Study used the same approach for our clients land then it is reasonable to conclude this would have resulted in a different conclusion.

It is evident the approach adopted by the Council is far from being “thorough or consistent” when it comes to the Green Bet Study and the Council has provided no justification for singling out our clients site for an entirely different approach.

The Pro-Forma for our clients sites are Ref C-054 and C-073. In each case the scoring was 23 strong, 5 medium, 3 weak. Scores which far exceed sites which have been included in the submitted plan for residential development. A case in point is the nearby by site C-064 where the scores were 17 strong, 10 medium, 4 weak. A review of other proposed Green Belt sites to be allocated for residential development indicates that none scored as highly as that of our clients.

So one asks. how is it that our clients sites which had the best Pro Forma scores were not taken forward as a proposed housing allocations in the submitted plan. The answer to that lies in the Qualitative Assessment where the reference is “This site is not recommended for further consideration by the Green Belt Review Stage 2 Report”. In fact, as indicated above the Green Belt Review did not assess our

clients site as per the HELLA and Pro -Forma sites but rather only considered it as part of a much wider site area. A completely different approach to the one used for other sites. The Council cannot claim it has been "thorough and consistent" when considering our clients site and has thus far has been unable to justify the different approach taken.

Para 1.11 the Council refers "that every reasonable effort has been made to identify and assess all potential sites in the District". Clearly given the above it has not.

We would invite Chris Briggs visits our clients sites and review the Councils Green Belt evidence in respect of them.

On the wider issue of the Councils urban sites, we have identified in our Hearing Statement that many are not deliverable due to development constraints. Many of these sites are under the control of the Council or where the Council has a land interest in common with others, for instance a number of the garage sites are subject to accesses serving properties which surround. Many the garage sites are back land sites which have accesses that are currently not capable of serving residential development to a minimum standard of a 4.1 metre carriageway plus 2 metre wide footpath. Measurements taken show a number only have 3.1 metre wide accesses. The accesses would require radius kerbs and visibility splays which due to the adjoining properties to the accesses is not achievable. The inclusion of city car parks which are at capacity during peak periods would require excessive build costs if, as the Council has gone on record to say, the number of car spaces available will not reduce. This inevitably means expensive decked parking, but there is no feasibility or viability whether this would be economic. In the circumstances these sites cannot be relied upon to deliver housing. The inclusion of Sainsbury's and Waitrose car parks are highly suspect for residential development given the importance that availability of car spaces provides to the retail operations on each site, the retail purpose of which is to cater for car borne shoppers. Without evidence that it is commercially viable for these sites to be developed for an alternative use they should be removed from the list of urban sites which would be available during the plan period. In short many of the identified urban sites are not realistically deliverable for residential development. In the absence of crucial evidence regarding the realistic prospect sites can be developed, they should be removed from the plan housing numbers. It is evident from the Councils web site that notwithstanding the acute shortfall in housing supply within the district these urban sites are not the subject of planning applications. The Council has a substantial housing land supply issue resulting in planning by Appeal and yet has been unable to unlock sites it owns for housing to increase the land supply. All this points that our assessment has merit; these sites are not deliverable for a number of different development reasons.