



St Albans City & District Council Local Plan Examination – Week 2 - Matter 8

Land at London Road, St Albans

September 2025

Prepared for:
Catesby Estates

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Revision Schedule

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
01	Draft	PD	09.25	BG	09.25	BG	09.25
02	Final	PD	09.25	BG	09.25	BG	09.25

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1 Introduction

- 1.1.1 This statement has been prepared by Stantec on behalf of Catesby Estates pursuant to Matter 1 Legal Compliance of the St Albans City & District Local Plan Examination. This follows representations to both the Regulation 18 and Regulation 19 Local Plan consultations in relation to Catesby Estates' land interest at Land South of London Road, St Albans (labelled as Land East of Napsbury Lane within the HELAA). The site is labelled as SA-25-21 within the HELAA. Please note previous comments were made in the name of L&Q Estates, which has recently been purchased by Catesby Estates.
- 1.1.2 The main parcel of the site is located north of the London Road Cemetery, on land between London Road and Highfield Park Drive. This parcel has an area of 14.22 hectares, and is predominantly in agricultural use. The site is generally flat, with a very gentle fall from north to south. It has good and well established planting around its boundaries, and has a school (Samuel Ryder Academy) to the north and the built form of Birklands Park and New House Park to the west. The site is considered to have a capacity for approximately 300 dwellings in a sustainable location on the edge of St Albans.
- 1.1.3 The site also includes land to the south of the London Road Cemetery, and further land to the western side of London Road adjacent to the junction of London Road and the A414. Details of the site and proposals are set out in the Vision Document that supports the previous consultation responses.
- 1.1.4 The site remains immediately available and is considered suitable and deliverable.

2 Matter 8

2.1 Issue 1 – Community Infrastructure – Policies SP7, SP14 and COM1-COM4

Q1: Are Policies SP7 and SP14 justified, effective and consistent with national planning policy? Will they enable the timely provision of new or enhanced infrastructure where needed to support growth proposed in the Plan?

- 2.1.1 Policy SP7 confirms that cemeteries and burial and crematorium facilities are considered as 'community infrastructure'.
- 2.1.2 Criteria b) of the policy seeks to encourage provision in areas that are in deficit. The policy itself does not set out the level of need, nor a timeline for when it is needed to come forward. The policy therefore assumes that provision will be delivered by need.

Q4: Is Policy COM2 justified and effective in seeking to support expansion, but only where it minimises impacts upon openness and the purposes of including land within the Green Belt?

- 2.1.3 Catesby Estates support policy COM2 in principle and supports the potential extension of the London Road Cemetery.
- 2.1.4 Draft policy COM2 relates specifically to cemeteries and burial grounds. The proposed development by Catesby Estates includes land to both the north and south of the St Albans Cemetery at London Road, St Albans. As per the comments made during the Regulation 19 comments, land remains available within the wider masterplan to provide an extension to this facility. This would relate to the land to the south of the existing cemetery as the land to the north remains available for residential development.
- 2.1.5 For information, Catesby Estates has sought to engage with the Council on the potential to extend the London Road Cemetery. However, discussions have not unfortunately come forward ahead of the Local Plan Examination.
- 2.1.6 The justification for policy COM2 is set out within the evidence base. The Technical Report Final Draft: Cemeteries Provision document dated March 2019 confirms the existing facilities and confirms the London Road Cemetery is 'the most popular', which is presumably linked to the population of St Albans. It also highlights demand for Muslim burials at the site. In chapter 6, the report states the following:

'The current London Road Cemetery location is situated on the outskirts of City of St Albans surrounded farmland between London Road and Nightingale Lane, (Hertfordshire County Council right of way). It is centrally based within the District, in close proximity to the main settlement of St Albans and near to the A414. Therefore it is in an accessible location for access by walking, cycling, public transport and private vehicles. An extension to the existing cemetery will also provide continuity for and efficiency for stakeholders visiting existing graves and memorials. It will also be more economically viable in operation than building a wholly new cemetery'
- 2.1.7 The Infrastructure Delivery Plan Stage Three: Infrastructure Delivery Plan report August 2024 further considers demand for cemetery facilities. When looking at options, it states that extensions to existing facilities will be more economically viable and that 'London Road Cemetery has been identified to be a suitable location for this'. There remains clear demand for the facility within the authority.
- 2.1.8 The NPPF confirms that cemeteries and burial grounds are appropriate development in the Green Belt as long as facilities preserve the openness of the Green Belt. This is reflected in the wording of policy COM2, although it references the need to minimise impact on openness.

The terminology is slightly inconsistent although it is agreed that the outcome would likely remain the same.

- 2.1.9 To achieve the tests within the NPPF, an extension to an existing facility would impact openness much less than a new facility, which would require new buildings rather than only small extensions to existing (if needed). The London Road Cemetery provides an opportunity to provide the much-needed additional space, whilst respecting the Green Belt and associated openness.
- 2.1.10 A further consideration regarding demand is that the Technical Report Final Draft Cemeteries Provision, March 2019 assesses need for cemetery space based on the Local Plan Trajectory of 888 dwellings per annum and up to 2036. Whilst that is appropriate for the current plan period, it makes no provision for the potential population growth that would result from the next local plan cycle.
- 2.1.11 The Examination has already looked at the options for a potential immediate review and therefore the next iteration of the Plan could be approved within the next 5 years. If based on current standard methodology figures, housing need would increase to 1,669 dwellings per annum before 2036. Demand for cemetery and burial space is likely to therefore increase beyond that set out within the evidence base.
- 2.1.12 It is noted that since the Report was published, a new cemetery has been constructed at Poppy Fields Cemetery, Bedmond Road, Hemel Hempstead through application 4/02553/17/MFA. Also, a crematorium has been approved at the site through application 5/2020/1331. The site sits within Dacorum Borough Council and whilst it may take some capacity from St Albans, this is unlikely to be at a rate that significantly impacts demand within St Albans.



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