

Examination of the St Albans City and District Local Plan Matters, Issues and Questions for Stage 2

Statement on behalf of Hertfordshire Land Ltd and Wheathampstead
Land Ltd

(Representor ID – 195)

Matter 7 – Issue 2 – Harpenden Site Allocations

Policy M19 – Piggottshill Lane, Harpenden

DLA Ref: 00/081

October 2025

Introduction

1. This statement is submitted on behalf of Hertfordshire Land Ltd and Wheathampstead Land Ltd, who own land at Piggottshill Lane, Harpenden ('the Site') and are promoting it for residential development. Representations have been made to Regulation 18 and Regulation 19 draft Local Plan consultations promoting the allocation of the Site for residential purposes.
2. This statement provides a response to the Inspectors' questions Q1-Q6, raised in respect of Policy M19 (Land at Piggottshill Lane) and UC47 (Land at Crabtree Fields) under Matter 7 (residential site allocations) and Issue 2 (Harpenden site allocations).
3. The owners of the site support its proposed allocation as part of the emerging Local Plan.

Question 1 – existing use

4. The Inspectors ask at **Question 1**: *“What is the existing use of the combined site and what is the reason for having separate allocations?”*
5. Site M19 is currently unused land. The grass is periodically cut but there is no active use at present. Site UC47 consists of a number of buildings in a variety of community uses, including a bowls club, scout hut and ATC training facility.
6. The Council will be able to advise on their rationale for having separate allocations but the different landownerships and existing use make separate allocations sensible in the circumstances.

Question 2 – site delivery

7. The Inspectors ask at **Question 2**: *“Is it clear how the entire site will come forward for development? Is it deliverable?”*
8. Site M19 is deliverable. The landowners have promoted it for some time for residential purposes and plan to sell the site to a housebuilder when the Local Plan allocation is confirmed.
9. In line with Policy M19, access is proposed to be taken through the District Council-owned land to the west, which is accessed from Waldegrave Park. The indicative development layout submitted at Regulation 19 stage shows how such access could be laid out. The indicative layout at Appendix One to this statement illustrates how the access would tie in with Waldegrave Park. The new access road would necessitate some changes to the current parking layout but, beyond that, would not affect the existing buildings or uses.
10. Discussions have been taking place with St Albans City and District Council with regard to access across their land and agreement in principle has been reached, subject to commercial terms being agreed.
11. The District Council will be able to advise on their plans for site UC47. However, it is possible that the developer building site M19 and constructing the access road could take on development of the UC47 site as part of the same project.

Question 3 – Green Belt boundary

13. The Inspectors ask at **Question 3**: *“What is the extent of the area to be removed from the Green Belt? How does this relate to the land allocated for development?”*
14. The area proposed to be removed from the Green Belt reflects the conclusions of the Stage 2 Green Belt Review by Arup, who round that *“The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt”*. The boundaries shown on the draft Policies Map reflect those recommended by Arup and meet the requirements of the NPPF in terms of their permanence and identifiability.
15. The land shaded in light brown on the Policies Map reflects the extent of site M19. The darker brown illustrates the extent of UC47, on which the Council will be able to comment.

Question 4 – exceptional circumstances

17. The Inspectors ask at **Question 4**: *“Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?”*
18. The Council has already set out the exceptional circumstances that necessitate changes to the Green Belt boundary. In summary, there is a high level of housing need that has largely gone unmet since the adoption of the last Local Plan in 1994 and there is demonstrably insufficient land within the urban areas to meet this need. Green Belt land inevitably needs to be released and it is then a question of which are the least harmful and most appropriate sites for release. The land at Piggottshill Lane was recommended for consideration through the Green Belt Review.
19. A relatively small area of land is actually proposed for development compared with the size of the Green Belt release. However, the harm arising from the development proposed is correspondingly small because much of the total area will remain unchanged and will remain protected by the proposed Local Green Space designation.

Question 5 – site access

20. The Inspectors ask at **Question 5**: *“Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?”*
21. In terms of existing arrangements, a safe and suitable access to site UC47 already exists from Waldegrave Park and serves a number of buildings and a large car park. Similarly, site M19 benefits from an existing access off Piggottshill Lane that could serve some development, although the Local Highway Authority has concerns about development on the scale of M19 being served off Piggottshill Lane.
22. The proposed access strategy is therefore for the access from Waldegrave Park to be extended to also serve residential development of around 29 homes on site M19. The indicative layout shown at Appendix One illustrates how the access arrangements could be reconfigured.
23. One advantage of development of this site is that it can provide a safer pedestrian and cycle route from Aldwickbury Crescent to the recreational routes at the northern end of Piggottshill Lane. Residents living in Aldwickbury Crescent wanting to walk along the River Lea, for example, currently use Waldegrave Park and walk along Piggottshill Lane, where there is no footway. Development of site M19 could enable a pedestrian and cycle connection to Piggottshill Lane some 220m further north than currently, meaning residents do not need to walk in the road for as long.
24. Further clarity from Policy M17 would be useful on what contributions might be sought from this scheme towards offsite highway improvements.

Question 6 – soundness of Policy M19

25. The Inspectors ask at **Question 7**: *“Is Policy M19 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?”*
26. The owners of site M19 support the allocation of the site in the draft Local Plan. We consider that the policy is justified, effective and consistent with national planning policy and should therefore be found sound.

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