

# Examination of the St Albans City and District Local Plan Matters, Issues and Questions for Stage 1

Statement on behalf of Jarvis Homes

Submission no. 205

Land at Beesonend Lane, Harpenden

Matter 3 – Issue 2 – Inspectors' Questions 1, 2 & 3

DLA Ref: 92/033

April 2025

## **Introduction**

1. This statement is submitted on behalf of Jarvis Homes, a local housebuilder based in Harpenden. Jarvis has a long-term interest in land at Beesonend Lane in Harpenden ('the Site') and is 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 use.
2. Both Jarvis Homes (a long-established housebuilder based in Harpenden) and their planning consultants, DLA Town Planning (based in St Albans since 1989), recognise the urgent need for a new planning framework to replace the 1994 Local Plan. This statement balances the need for a new plan with an awareness of the weaknesses of the draft Plan as currently written. Some of those weaknesses can and should be addressed now. Others will require more fundamental changes and should be addressed through an immediate review in order not to delay adoption of a new Plan.
3. This statement provides a response to the Inspectors' questions 2 and 3 raised under Matter 3 (Green Belt) and Issue 2 (Green Belt Review).

## **Summary**

4. In summary, this site was identified for release in the 2013 Green Belt Review but not in the 2023 Review. The approach in the 2023 Review was to amalgamate areas and assess them together, when a proper approach would have been to assess the implications of each site on its own.
5. In order to move quickly to adoption of the Local Plan, DLA Town Planning's assessment of the Beesonend Lane site using Arup's methodology should be used in place of the Stage 2 assessment and this should lead to identification of the site for residential development.

### Matter 3: Issue 2 – Green Belt Review

6. The Inspectors ask the following questions:

Q1: “How does the methodology in the 2023 Stage 2 Green Belt Review differ from the earlier studies in 2013 and 2014 referenced above?”

Q2: “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?”

Q3: “Is the methodology by which sites have been assessed in the Stage 2 Green Belt Review sufficiently robust and transparent to support the proposed boundary revisions? If not, what approach should have been used and why?”

7. The land at Beesonend Lane was identified for potential release from the Green Belt in the SKM review in 2013 as a small-scale sub-area (ref SA-SS5). By contrast, the site was not recommended in the 2023 Arup review. These two assessments were carried out in the context of essentially the same national policy framework. Any differences in methodology that might explain the difference in outcome between the two reviews are therefore crucial.
8. In response to the Inspectors’ initial questions on Green Belt matters, the Council set out at para 10.5 of ED32 the approach to the identification of sub-areas.

*“The Stage 2 GBR examined the performance of Green Belt within St Albans against the NPPF purposes deemed relevant in this context (i.e. purposes 1-4) using granular land parcels (sub-areas) as the unit of analysis. A total of 182 sub-areas were identified for this review. To ensure an exhaustive approach, these were based on the weakly performing strategic sub-areas and small-scale sub areas identified for further consideration in SKM Stage 1 GBR as well as sites within the Green Belt emerging from the Council’s own work on sites.”*

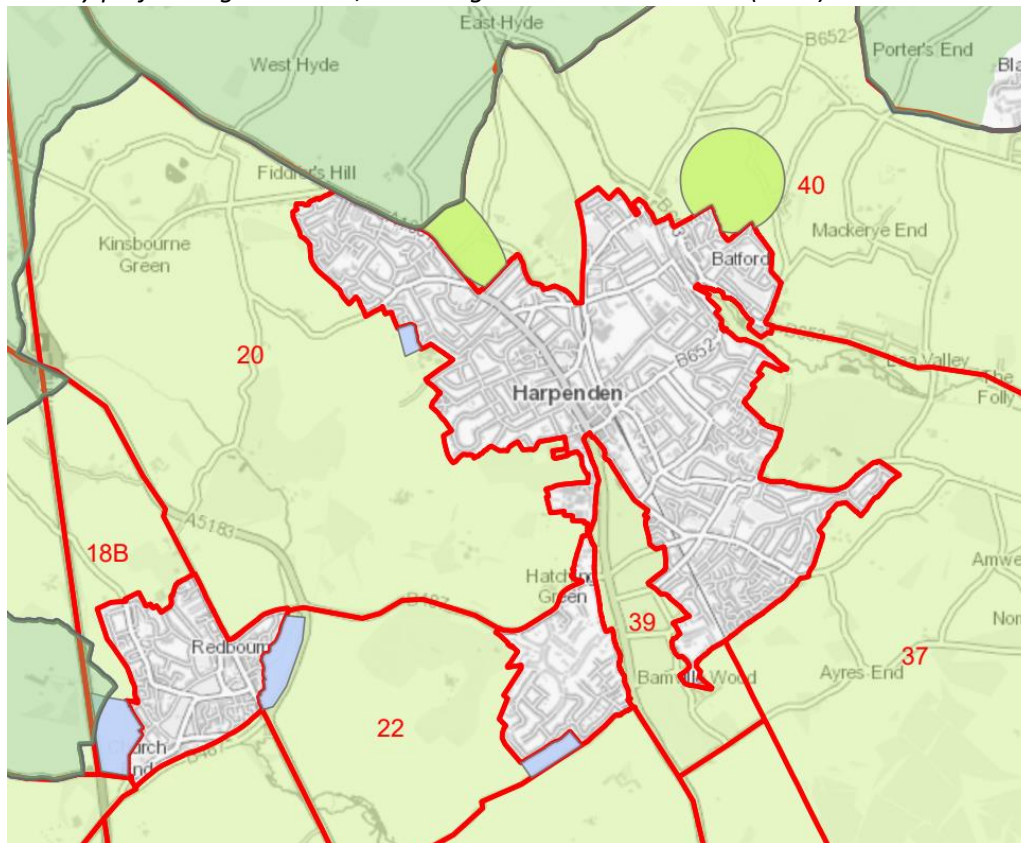
9. It is clear that this is not the case in respect of the Beesonend Lane site. Figures 5 and 6 from our Regulation 19 representations (replicated at Appendix One) showed the boundaries of SA-SS5 from the 2013 SKM Review and sub-area SA-12 from the 2023 Arup Review. The boundaries are not the same.
10. The change in boundaries meant that the land at Beesonend Lane was not considered alongside the rest of SA-SS5 (which became sub-area SA-11, which was recommended) but instead was grouped into a much larger area extending over 1km to the west of the report site. The report site makes up just 5.4% of SA-12. The Green Belt implications of the report site are clearly different from those of the rest of SA-12, as is demonstrated by DLA Town

Planning's assessment of the report site (include at Appendix 1 to the Regulation 19 representations).

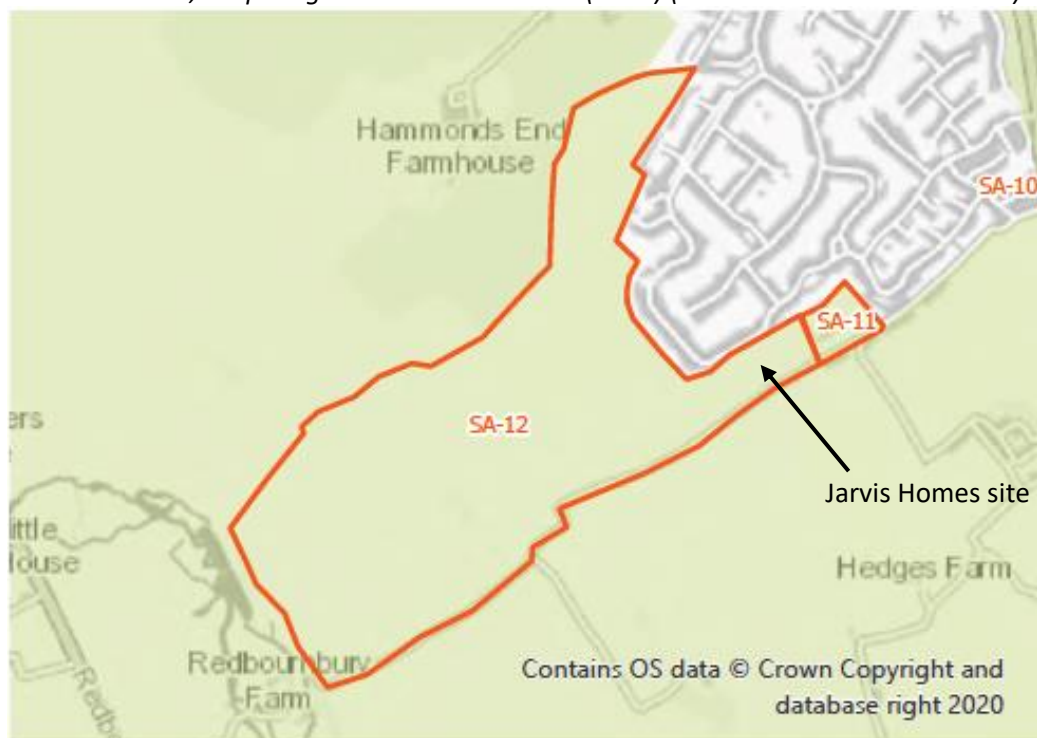
11. The Inspectors examining the Local Plan submitted in 2019 were concerned that the 2013 Green Belt Review was not sufficiently detailed. In respect of the land at Beesonend Lane, the 2023 Green Belt Review is actually less detailed than the 2013 version.
12. In answer to the Inspectors' question Q3, and specifically in respect of the land at Beesonend Lane, we do not consider that the Stage 2 Green Belt Review is sufficiently robust to support the proposed boundary changes. There is a clear rationale as to why the Beesonend Lane site should have been assessed on its own. DLA Town Planning undertook this assessment using the Arup criteria and mirroring the Arup judgements as far as possible. This assessment was included as Appendix 1 to the Regulation 19 representations).
13. To move things forward and ensure a timely adoption of a Local Plan, we suggest the DLA Town Planning assessment is used and that the land at Beesonend Lane then becomes a housing allocation in the emerging Local Plan.
14. There is a further specific issue in relation the previously proposed allocation M14 (Green Belt sub-area SA-11). This site was deleted between Regulation 18 and 19 stages on the basis of a proposed extension to the Chilterns National Landscape designation. Our Regulation 19 representations highlighted that there were no specific proposals in the public domain and that proposed consultation had been delayed. Since November, the Chilterns Conservation Board's website has been updated and now suggests consultation in "late spring/early summer".
15. We continue to maintain that the deletion of a proposed housing allocation on the basis of a possible future consultation on a possible future boundary change is not justified.

## Appendix One – Green Belt Review boundaries

*Weakly performing sub-areas, SKM Stage 1 Green Belt Review (2013)*



*Sub-area SA-12, Arup Stage 2 Green Belt Review (2023) (Jarvis Homes site annotated)*



DLA | Heritage

DLA | Strategic

DLA | Commercial

DLA | Residential

DLA | Leisure

DLA | *Solutions*