

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

Statement on behalf of Miller Homes

(Representor ID – 212)

Matter 7 – Issue 2 – Harpenden Site Allocations

Policy B2 – North East Harpenden

DLA Ref: 21/468

October 2025

Introduction

1. This statement is submitted on behalf of Miller Homes, who are working with the owners of Land at Lower Luton Road, Harpenden ('the Site') to promote 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-Q7, raised in respect of Policy B2 (North East Harpenden) under Matter 7 (residential site allocations) and Issue 2 (Harpenden site allocations).
3. Both Miller Homes and the owners of the site support the proposed allocation of the site as part of the proposed North East Harpenden Broad Location.
4. The North East Harpenden Broad Location is being promoted by the following (shown graphically at Appendix One:
 - Crest Nicholson (planning consultants: Stantec) – approx. 500 dwellings
 - Miller Homes (DLA Town Planning) – approx. 100 dwellings
 - ME Simons & Wimms (Bidwells) – approx. 160 dwellings
 - Mr & Mrs Mitchell (Savills) – approx. 23 dwellings
5. The parties have been working collaboratively together to promote the site for a number of years. Both Crest Nicholson and Miller Homes have been preparing planning applications in recent months and have engaged on various detailed matters, including transport and movement and surface water drainage.

Question 1 – Site boundary justification

6. The Inspectors ask at **Question 1**: *“What is the site boundary based on and is it justified and effective? What is expected of development proposals within the area retained as Green Belt?”*
7. The Miller Homes site is situated on the western side of the Broad Location. The boundaries to this particular part of the site are clear in that it bounds Lower Luton Road and the existing residential development at Barley Rise. These boundaries are clear and obvious.
8. In respect of the wider Broad Location, the boundaries are aligned with Common Lane on the eastern side and Bower Heath Land on the western side. In between those two roads, the northern boundary of the site is defined by landscape features that demark the extent of land being promoted by Crest Nicholson and in part by a Public Right of Way.
9. The land proposed to be retained within the Green Belt is being promoted by Crest Nicholson so their response to this question should be sought. However, from Miller Homes’ perspective, criterion 3 of Policy B2 highlights potential for outdoor sports provision to be located in that part of the site. There will be other aspects of strategic development that could also be located in these areas that would be compatible with Green Belt policy, such as ecological measures or informal open space.

Question 2 – Green Belt boundary justification

10. The Inspectors ask at **Question 2**: *“What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?”*
11. 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.
12. While only part of the North East Harpenden site was specifically identified in the Green Belt Review, the Council has decided that the scale of development and the benefits provided form the exceptional circumstances necessary to justify a change to the Green Belt boundary. This conclusion is strongly supported by Miller Homes.
13. The proposed Green Belt boundaries appear consistent with national policy in terms of their recognisability and permanence. In respect of the Miller Homes site specifically, the Green Belt boundaries are clearly defined by Lower Luton Road and the existing housing to the west.

Question 3 – exceptional circumstances

15. The Inspectors ask at **Question 3**: *“Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?”*
16. Our response to this question is largely covered in paragraphs 5 and 6 above – Green Belt land is required to meet housing needs and the Council has decided that the scale of development and the benefits provided form the exceptional circumstances necessary to justify a change to the Green Belt boundary.

Question 4 – mix of uses and delivery

17. The Inspectors ask at **Question 4**: *“How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner?”*
18. The mix of uses set out in Policy B2 is typical for a sustainable urban extension of this size and is aimed at providing a degree of self-containment within the development by providing basic day-to-day facilities that will also benefit the wider area.
19. A two-form entry primary school would cater for the children arising from the development, while providing some additional capacity for growth elsewhere. Outdoor sports provision and open space is also normal practice for a site of this size. A local centre will provide a focal point for the new development and locating accommodation for older people near to the local centre maximises accessibility and integration between age groups.
20. The mix of uses set out in Policy B2 reflects those proposed by the landowners and developers promoting the site. The Crest Nicholson part of the site is the largest and most central and therefore the most logical location for the primary school and local centre. Crest Nicholson is proposing to provide these elements as part of their development and ongoing masterplanning work will set out the active travel links within the site to ensure accessibility and permeability through the site.
21. With regard to achieving a coordinated and coherent development, although the land covered by Policy B2 is in four separate ownerships, the majority (around 77% by land area and 65% by residential capacity) is controlled by Crest Nicholson. The delivery of the majority of homes, together with the main non-residential elements (local centre and site for a primary school), will be delivered by Crest Nicholson.
22. A draft masterplan for the Broad Location was submitted at Regulation 19 stage by the various promoters of the Broad Location. Preparatory work on planning applications for the Crest Nicholson and Miller Homes parts of the site has enabled this masterplan to be refined and the updated version is attached as Appendix Two to this statement. The masterplan shows the location of the key components of the development and sets out a movement strategy across the Broad Location, including proposed connections between the sites.

Question 5 – access and highways

23. 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?”*
24. Pre-application advice has been sought from the Local Highway Authority by Crest Nicholson and this advice related to both their land and the wider strategic parcel. The Local Highway Authority will be able to confirm to the examination their position but it is understood that they are comfortable with the access strategy for the allocation as a whole.
25. In respect of the Miller Homes parcel, pre-application discussions have taken place with the Local Highway Authority and a written response is awaited. The pre-application meeting confirmed agreement in principle to a new access to the Miller Homes part of the allocation from Lower Luton Road. Discussions took place around coordinating walking and cycling links between the Miller Homes and Crest Nicholson parts of the site and these are reflected in the updated Masterplan at Appendix Two.
26. The separate access to the Miller Homes site enables housing completions on both sites concurrently and therefore should help to speed up overall delivery of the site.
27. Additional clarity in Policy B2 would be welcomed on what highway improvements are needed, particularly the relationship between the Transport Impact Assessment (TIA) and the Local Cycling and Walking Infrastructure Plan (LCWIP), which describe projects in slightly different terms.

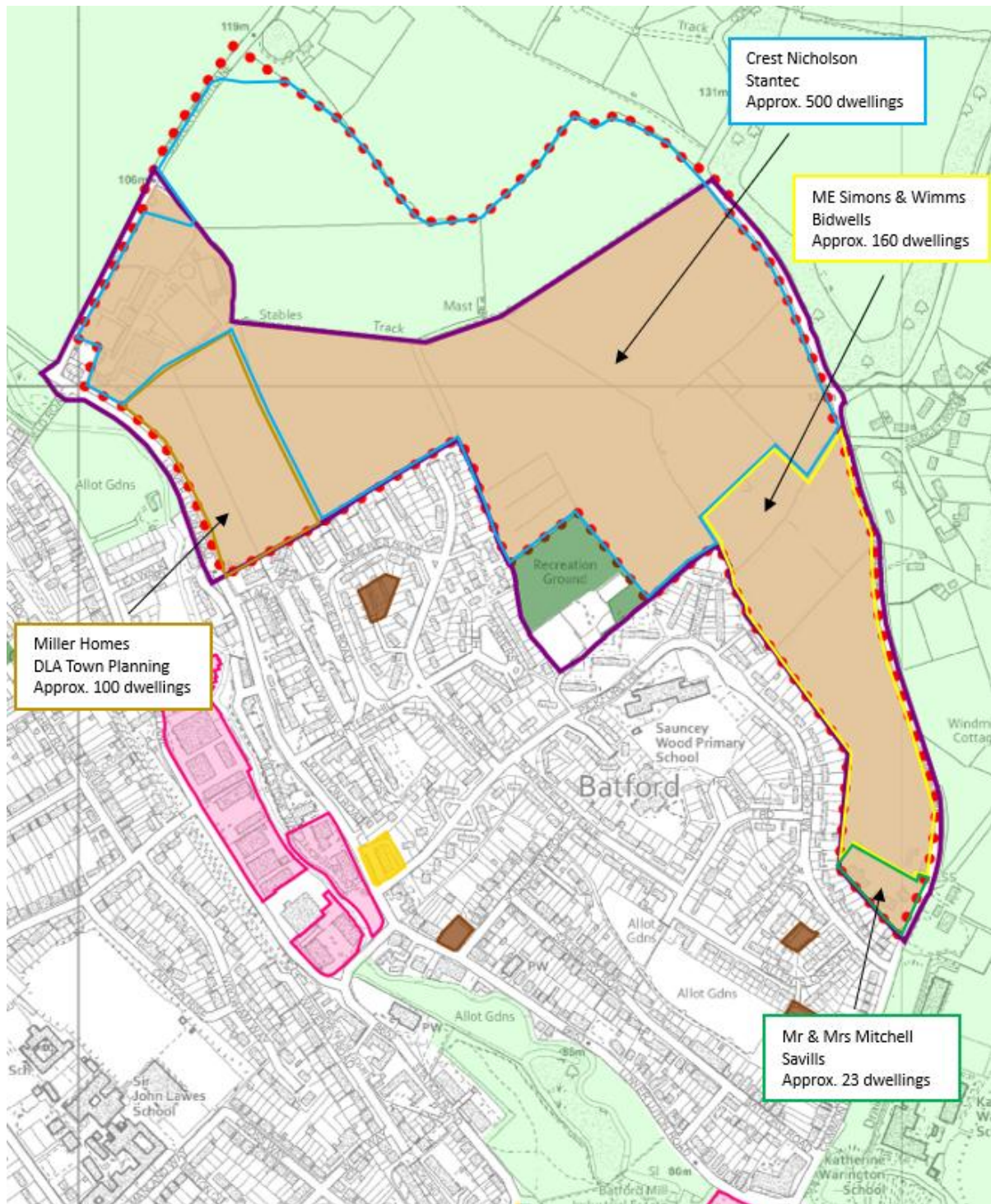
Question 6 – landscape

28. The Inspectors ask at **Question 6**: *“How have the landscape impacts of the allocation been considered? Can the site be delivered in a way that avoids harmful landscape impact?”*
29. Site B2 is located between, and contained by, Bower Heath Lane and Common Lane. The northern boundary is less well defined but still based on identifiable features. The Miller Homes part of site B2 is particularly well contained by existing housing to the south, by Lower Luton Road to the west and by the Greenacres equestrian centre to the north. Only the northern boundary is not contained by built development.
30. As set out in the Council’s Landscape and Visual Appraisal for the Broad Locations (September 2024), site B2 can be split into three distinct landscape areas. The Miller Homes part of the site is within the northern area, primarily made up of the west-facing slopes of the Lee Valley. The LVA provides guidelines on the orientation of development and open space to frame views out of the site to the open/wooded horizons and also using bands of structural tree planting across contours to soften the roofscape. These guidelines will inform pre-application discussions with the Council.

Question 7 – soundness of Policy B2

31. The Inspectors ask at **Question 7**: *“Is Policy B2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?”*
32. Miller Homes, as promoter and prospective developer of the site, supports the allocation of site B2 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.

Appendix One – summary of landowners/promoters of North East Harpenden



[illegible]

DLA | Heritage

DLA | Strategic

DLA | Commercial

DLA | Residential

DLA | Leisure

DLA | *Solutions*