

ST ALBANS LOCAL PLAN EXAMINATION

Matter 7: North St Albans

Hallam Land and St Albans School

September 2025

1. This Hearing Statement has been prepared on behalf of Hallam Land and St Albans School (HL&SAS), who are working together to bring forward a mixed-use urban extension at North St Albans. This corresponds with 'Broad Location' B1 set out in Part B of the Regulation 19 Plan.
2. HL&SAS have previously provided a written statement in response to certain Stage 1 Matters.

CONTEXTUAL POINTS

3. The development potential of land at North St Albans has been recognised by the District Council for over ten years. It was identified as a proposed Broad Location in the 2018 Draft Local Plan and planning permission has since been granted for housing development on part of the site.¹
4. In the context of the 2018 Draft Local Plan, joint working pursuant to a planning performance agreement involving the District Council, the County Council and the promoters culminated in a Masterplan for this Broad Location. This reflected what was then required to formulate development proposals in the context of the local authority's Strategic Sites Masterplanning Guidance. The formulation of that Masterplan involved both community consultation and Design Review organised by the District Council in 2020. It was presented to the then Local Plan Advisory Group prior to that Local Plan being withdrawn. We understand North St Albans is the only one of the Broad Locations to have gone through that process.
5. In 2023, once the LPA had re-started Local Plan preparation, North St Albans was again identified as a proposed Broad Location. The promoters and the local authorities later entered into a further planning performance agreement in 2024 relating to pre-application discussions. An outline planning application, framed by Policy B1 of the Regulation 19 Plan, was submitted by HL&SAS at the end of 2024.² This application is yet to be determined.
6. This sustained collaboration demonstrates that the site is not only suitable but also a commitment to the early delivery of this Site.

¹ Outline planning permission was granted in 2021 for a development of up to 150 new homes (5/2021/0423). This is referred to as Sewell Park and is the land that immediately adjoin the rear curtilage of properties on Harpenden Road. Since then, that land has been sold to Cala Homes. The LPA resolved to grant reserved matters approval for a scheme of 123 on the 1st September 2025 (5/2021/1284).

² 5/2024/2272 Outline planning application seeking planning permission for inter alia up to 1000 new homes and associated, and relocation of existing playing pitches.

MATTER 7 – RESIDENTIAL SITE ALLOCATIONS

Issue 1

Q1 Based on the discussions at the Stage 1 hearing sessions (where it was agreed that the 'Broad Locations' are specific site allocations), is Policy LG1 necessary, justified and effective?

7. Policy LG1 lists many requirements which development proposals at each of the Broad Locations must comply with. It is to be read in conjunction with the site-specific policies in Part B which include more specific requirements and greater levels of detail relevant to each Broad Location. Certain aspects of the Policy are also the subject of later topic specific policies and arguably are not necessary as the Plan must be read as a whole, for example, criteria (c), (h) and (j).
8. For the most part these criteria are unobjectionable, although we make the following particular observations:
9. The term “excellence” in criterion (d) is imprecise and is not consistent with the term “high-quality” in Chapter 12 and Policy SP12.
10. Criteria (a) and (g) in effect give the weight of the development plan to supplementary planning guidance, which is not appropriate. For example, the strategic sites guidance referenced in criterion (a) has never been subject to public consultation. Such documents are intended to be material considerations that would apply in any event and should not be referenced in this policy in the terms expressed currently.
11. Criterion (l) is also the subject of Policy NEB1(a) and arguably does not need to be repeated. As a practical matter the requirement for tree planting at the scale and type proposed could conflict with other legitimate development objectives.

Q2 Where necessary, do the relevant site allocations include a requirement to provide and/or contribute towards new infrastructure for health care and education?

12. In so far as B1 is concerned, yes, such infrastructure is referenced at criteria (2) and (3). This is also referenced in the Infrastructure Delivery Plan (INF 01.01).
13. Discussions have been held with both the Local Education Authority and the Herefordshire and West Essex Integrated Care Board as to the land and space requirements associated with such infrastructure as part of the proposed development, or the alternative of financial contributions for off-site provision that could be secured by means of planning obligations. The submitted outline planning application anticipates the provision of such infrastructure.
14. Policy COM1(a) also requires education provision either on-site or by making a suitable contribution towards the improvement or expansion of nearby existing facilities.

Policy B1 – North St Albans

Q1 What is the site boundary based on and is it justified and effective?

15. The B1 site boundary reflects land that is owned by (1) St Albans School and St Albans School Woollam Trust, and separately (2) Cala Homes.
16. In broad terms the boundary adjoins the Woollam Playing Fields complex (north west), properties that front Harpenden Road (west), St Albans Girls School (south west), Longspring Wood (south), beyond which is Porters Wood Industrial Estate, and the mainline railway (east). These adjoining land uses represent urbanising influences. The northern boundary extends along the southern edge of an established tree belt but extends further north into the agricultural field known as Longcroft.
17. These boundaries represent physical features that would contain built development. These boundaries ensure that new development would not result in an incongruous pattern of development. In these terms the boundary is both justified and effective.
18. Criterion 4 of Policy B1 refers to the reprovision of existing playing fields as part of the development. These are to be relocated to Longcroft, immediately east of the Woollam playing fields complex. This explains the irregular northern site boundary. Outdoor sports facilities, including buildings, are, as a matter of principle, an appropriate form of development within the Green Belt³ and therefore that part of the Site is retained within that designation. These playing fields would be contained by new landscape planting.

Q2 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?

19. As delineated on the inset map associated with Policy B1, the revised Green Belt boundary would contain the proposed built development, whilst the relocated playing fields would be retained within the Green Belt.
20. The new Green Belt boundary described above would comprise established physical features that are readily recognisable and are likely to be permanent in accordance with paragraph 148 (f).
21. The Green Belt boundary in this location would not need to be amended at the end of the Plan period to accommodate this development unless further development was proposed in the next Local Plan.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

22. Matters relating to the strategic need to alter the Green Belt have been considered in earlier sessions. The LPA are to be commended for choosing to amend the Green Belt.
23. In terms of the spatial strategy, it is notable that the Sustainability Appraisal (LPCD.03.01) refers to a compelling case to amend the Green Belt Boundary at the main settlement St Albans. Naturally there are competing interests between achieving the most sustainable pattern of development and

³ NPPF 154(b)

affording protection to the Green Belt. In the circumstance where the main settlement is enclosed by the Green Belt, the overarching objective in national policy to manage patterns of development to achieve sustainable development is notably important.

24. Turning to this location, exceptional circumstances do exist to justify amending the Green Belt boundary to enable development at North St Albans.
25. It is acknowledged that the Arup Study (GB02.02) did not recommend that the various field parcels that comprise this allocation should be removed from the Green Belt on the basis of its methodology, but that view is just one factor in the planning judgements required in the preparation of a new Local Plan in the context of wider planning policy objectives.
26. Reflecting the fact that all Green Belt land contributes to a greater or lesser extent to the five Green Belt purposes, as evident from the Arup Study, the particular function of the Green Belt in this location is to maintain separation between St Albans and Harpenden (GB.03.01 Figures 7.2 and 7.7 and GB03.02 Parcel 38 at pages 80 - 82).
27. Removing this land from the Green Belt would have no discernible effect on either the extent of existing separation or the character and identity of the respective settlements. Equally it would not alter the pattern of development across the plan area. Rather, development here would be entirely congruous with that pattern and benefit from proximity to facilities and services locally and elsewhere within the settlement.
28. New development would be contained by the identified physical boundaries, thus continuing to safeguard the countryside beyond from encroachment. The compact form of development does not represent or give rise to urban sprawl. The consequent impacts on the purposes of the Green Belt are therefore minimised and such an alteration cannot reasonably be said to undermine the purposes of the Green Belt across the plan area.
29. The alternative must also be contemplated. Retaining the Green Belt in this location would not diminish the need for such an alteration or alterations at some other location(s), most likely more distant from the principal settlement, with consequential effects.

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner?

30. The mix of uses proposed reflect both evidence of need and the joint working over a considerable period of time between the promoters and the LPA. This is reflected in criteria 1 to 5.
31. The County Council has identified a need for a new primary school along with specialist accommodation for the elderly and assisted living. The Integrated Health Board has identified a need for additional healthcare capacity.
32. A commercial centre to provide services and facilities to meet day to day needs is commonplace in a development of this scale.
33. The replacement playing fields are necessary to enable the development. Whilst additional sports provision arises from the additional resident population, this could be provided in the form of off-site improvements to existing playing pitches and William Bird Pavillion at Toulmin Drive which have been identified by the District Council as being of poor quality.⁴
34. Criterion 8 of Policy B1 requires pedestrian and cycle links to be provided between the main site and that which benefits from planning permission. That planning permission is subject to a planning condition that requires pedestrian and cycle connections to be provided to the boundary of that land. Those routes can be mirrored on the remaining part of the development to ensure connectivity between the respective parcels and thus a coherent form of development overall.

⁴ St Albans Playing Pitch Strategy 2023 Table 4.3 LCRT.02.01

Q5 How have flood risk and ecology been taken in account as part of the site's allocation?

35. North St Albans comprises land that is subject to both intensive farming activity and well managed playing fields. Save for hedgerows and woodland at the southern boundary, there is little intrinsic ecological value within the site. The site is within Flood Zone 1, but there is a small extent of surface water run off on account of agricultural practices and topography and the absence of any positive drainage features.

Flood Risk

36. The Strategic Flood Risk Assessment (EDH.01.01) has considered the presence of the surface water flow path. This is further explained in SADC/ED77, notably paragraph 7.3.
37. Having identified the presence of surface water flow path, the authors, JBA, undertook a visual assessment of the Site to determine whether the Site was developable in the face of this.
38. Due to the confined corridor and marginal extents of surface water flood risk through the Site, JBA considered the Site to be developable, providing a sequential approach was applied to the layout of the development.
39. Reflecting this approach, and Policy NEB6, development can be arranged across the Site to respect the flow path as part of the green and blue infrastructure strategy.

Ecology

40. The Sustainability Appraisal (LACD.03.01) refers to the following in respect of B1: "The southern extent is notably constrained by Long Spring LWS (ancient woodland), which is associated with a public footpath and potentially serves a role in terms of functional connectivity between habitat patches at a landscape scale. Also, Sandridgebury Lane cuts through the site, which is associated with historic hedges. On the other hand, growth here would be in close proximity to Heartwood Forest, such that it could potentially contribute to targeted enhancements."
41. The Habitats Regulation Assessment (SACD.04.01) indicates that B1 is "*Located outside of the Chilterns Beechwoods SAC Recreational 12.6km ZOI*". (Table 3 refers).
42. Similar information is recorded in the relevant Site Selection proforma (LPSS.02.04, pages 2 and 3). These ecological characteristics are not of a scale that preclude the proposed allocation.
43. To account for ecological considerations, criterion 10 of Policy B1 requires that "Development proposals must take appropriate account of the Ancient Woodland, County Wildlife Site, Priority Habitat and trees covered by Tree Preservation Order along the south-east boundary, and the Priority Habitat close to the eastern boundary comprising an area of deciduous woodland." This is reflected in the scheme for which planning permission is sought. Policies SP10, NEB1, NEB6 and NEB7 are also relevant in protecting landscape and ecological features within the site in determining an appropriate form of development.

Q6 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?

44. INF.09.06 (pages 1 to 4) provides relevant information about access and movement for development at B1.
45. The main access to B1 will be from Harpenden Road. Planning permission has already been granted for such an access to serve the Cala Homes development. For the remaining part of the proposed allocation, in principle agreement has been reached with the Local Highway Authority in relation to the new signal-controlled junction north of the petrol filling station and small enclave of housing on Harpenden Road.
46. Criterion 6 and 7 of B1 specify the highway improvements that are expected. They are focused on pedestrians and cycle improvements along Harpenden Road and at the King William and Ancient

Britton junctions and the city centre to offer a genuine opportunity to promote modal shift and reduce car dependency. These correspond to the priority corridor in the published Local Cycling and Walking Improvement Plan (INF.07.01) and are intended to deliver the emphasis on active travel in the Local Transport Plan (INF.14.01). Improvements to bus infrastructure is also to be expected, reflecting the fact that Harpenden Road is a principal public transport movement corridor extending to the city centre.

47. The potential closure of Sandridgebury Lane and Valley Road within the site to enable their repurposing as active travel routes with the associated re-routing of traffic to Harpenden Road has been discussed and agreed in principle with the Local Highway Authority and the LPA.
48. Such infrastructure is expected either in the form of direct delivery pursuant to Section 278 agreements or by way of financial contributions. The latter mechanism clearly has greater applicability when dealing with improvement schemes in the city centre where a great many of the other proposed allocations are expected to make such contributions to enable strategic solutions that have a wider utility.
49. It is notably that the Sustainability Appraisal (LPCD03.01) indicates that B1 does not give rise to any clear transport concern, given good connectivity to a top tier settlement, plus reasonable connectivity to key destinations outside of the District and goes on to acknowledge the particular opportunity that exists in terms active travel (9.13.7).
50. INF.09.06 concludes "The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety. Overall there are no showstoppers". Nothing in the more Transport Modelling note SADC/ED76C suggests that the transport effects of B1 are unacceptable.

Q7 Is Policy B1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

51. When considering the requirements of the National Planning Policy, Policy B1 is justified and effective. The North St Albans site has been long identified for development with a commonly held view of what the development should comprise and how it is to be arranged.
52. Policy B1 is effective in ensuring that development proceeds in a coordinated and sustainable manner. It defines the nature and form of appropriate development and identifies necessary supporting infrastructure, including mitigation measures.
53. Section 6 and Appendix 1 of our Regulation 19 representations identified changes to the text of Policy B1 to ensure that it is clearly written and unambiguous, to assist the decision-maker in the terms of paragraph 16(e) of the Framework.

OJ/18.260
26th September 2025