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# **St Albans City & District Council**

## **Local Plan Examination**

Representations on behalf of L&Q Estates  
Matter 3: The Spatial Strategy,  
Settlement Hierarchy and Development Strategy

December 2019

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Matter 3: The Spatial Strategy,  
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## **1.0 INTRODUCTION**

- 1.1 This statement has been prepared by Barton Willmore LLP on behalf of L&Q Estates (formerly Gallagher Estates) pursuant to Matter 3: The Spatial Strategy, Settlement Hierarchy and Development Strategy. This follows representations to both the Regulation 18 and Regulation 19 Local Plan consultations in relation to L&Q Estates' land interest at Land South of London Road, St Albans (the 'Site'). It has been titled 'The Greenway' during the Local Plan consultation process.
- 1.2 The Site extends to 14.22 hectares in area and provides the opportunity to successfully accommodate a highly sustainable development of 300 residential units in this edge of town location. The Regulation 19 representations were accompanied by a Vision Document dated February 2018 and a Landscape Appraisal and Green Belt Review, which describe the site and its opportunities in more detail.

## 2.0 MATTER 3: QUESTION 6

### **Is the proposed development strategy set out in policy S2 appropriate and realistic?**

- 2.1 Policy S2 confirms the objectively assessed need will be met through development at all of the Category 1 settlements, as well as expansion of Chiswell Green and the development of Park Street Garden Village.
- 2.2 Spatially, the principle of the distribution of dwellings is generally supported. The larger settlements, including St Albans, should be the focus for new development given the sustainable advantages these settlements provide. In the case of St Albans, the city benefits from two railway stations and regular bus services internally and to neighbouring settlements. It has significant employment opportunities, as well as a large town centre providing numerous services and facilities.
- 2.3 St Albans District has a chronic shortage of both market and affordable housing. The under provision of housing is highlighted in the result for the 2018 Housing Delivery Test (58%), which confirms the requirement of a 20% buffer. Policy S2 should aim to fully ensure that housing can be delivered in the Plan period, whilst being cognisant of historical performance.
- 2.4 The development strategy is based upon the development of the Broad Locations only. The strategy does not relate to the development of small or medium scale sites. Such sites provide more flexibility in terms of housing delivery. In particular, they allow early delivery given the lesser infrastructure requirements compared to strategic locations. As a result, they provide the opportunity to boost the five year housing land supply, and reduce the need for a stepped trajectory across the Plan period. The additional of small and medium sites alongside Broad Locations would also provide flexibility to the housing provision should there be any delay as anticipated at Park Street Garden Village or not come forward at all.
- 2.5 The lack of medium and small sized dwellings results in policy S2 not providing a realistic strategy for effective housing delivery over the Plan period. This matter is expanded upon further in the response to question 8 below.
- 2.6 Policy S2 specifically states '*These locations minimise adverse impacts on the purposes of the Metropolitan Green Belt*'. A Landscape Appraisal and Green Belt Review of the Site

south of London Road was submitted with the Regulation 19 representations. This demonstrates that the development of the Site would not cause any demonstrable harm to the five purposes of the Green Belt. The wider site was assessed through the Council's Green Belt Review Purposes Assessment 2013 (site GB32), which confirmed only a significant Green Belt impact in terms of maintaining the existing settlement pattern. However, that study has assessed a 101 hectare area. Development at the Greenway would therefore also meet the wording of the proposed policy in this regard.

### 3.0 MATTER 3: QUESTION 8

#### **Should the Plan include some small and medium size sites in order to provide greater choice and flexibility and accord with NPPF paragraph 68**

- 3.1 The strategy for housing delivery within the Plan is to provide strategic development within the identified Broad Locations. There are no other new allocations of land within the Plan. Appendix 5 does provide a list of small residential sites that already benefit from planning permission and these are noted within the accompanying trajectory. However, the Local Plan does not seek to allocate any small or medium sized sites.
- 3.2 Paragraph 68 of the NPPF states that '*small and medium sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly*'. The NPPF therefore clearly identifies the benefits that small and medium sized sites can bring.
- 3.3 Medium sized sites have the significant benefit that they can deliver without the need for major infrastructure requirements. This results in early delivery of dwellings. In terms of the Greenway, there is no requirement for any infrastructure upgrade that could delay any development.
- 3.4 This is emphasised in the document 'Driving housing delivery from large sites: What factors affect the build out rates of large scale housing sites' October 2018 undertaken by Lichfields. This demonstrates that within the scope of that study, sites between 100-499 dwellings can deliver within approximately 4.1 years. In comparison, a site over 2,000 dwellings such a Park Street Garden Village is shown to deliver after 8.7 years.
- 3.5 The Greenway will also be able to delivery policy compliant levels of affordable housing, as well as being able to provide meaningful contributions to local services and facilities as identified, secured through a Section 106 agreement. The Plan therefore is unsound in this regard. To move forward, small and medium sites should be added to the development strategy, with the relevant policies and trajectory amended accordingly.

## 4.0 SUMMARY

- 4.1 The development strategy within the Local Plan seeks extensions to the identified category 1 settlements, as well as an extension to Chiswell Green and the Park Street Garden Village. It does not include any other small or medium size sites other than those already consented as listed in Appendix 5.
- 4.2 The development strategy is therefore considered inflexible and is overly reliant upon Broad Locations, including four sites totalling over 1,000 units each, coming forward. Should any delays occur as anticipated at Park Street Garden Village, there is no flexibility in the Plan or the ability to find necessary housing numbers from realistic sites.

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