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Dear Mrs Crosby & Mrs Worthington

**St Albans City and District Local Plan 2020-2036
On behalf of Ralph Catton Family Trust & Shanly Homes Ltd
Stage 1 Hearings**

- 1.1 Please find below responses to Matters and Questions for Stage 1 of the Examination Proposed on behalf of the landowners of omission site 'Land West of Westminster Fields, Harpenden'.

**Matter 3 – The Spatial Strategy, Settlement Hierarchy and Development Strategy
(Policies S1 and S2)**

Q6. Is the proposed development strategy set out in policy S2 appropriate and realistic?

- 1.2 Policy S2 accepts that exceptional circumstances exist to necessitate major developments in locations previously designated as Green Belt. However it is considered that the Council has focussed too much on much larger development sites without including a range of smaller release sites that can be delivered earlier in the plan period and are not at risk of delay due to complexities of landownership, and the need to deliver associated infrastructure.
- 1.3 As detailed within the 'Broad Locations for Development in Policy S6', the two Harpenden release sites are proposed for a minimum of 580 (NW Harpenden) and 760 dwellings (NE Harpenden), with housing not envisaged to come forward at NE Harpenden until 2026 according to the Housing Trajectory within Appendix 2. These sites have multiple ownerships and due to the scale of development proposed will need to be accompanied by physical infrastructure and therefore have the potential for delay. All of the broad locations identified in Policy S6 are larger sites.
- 1.4 It is considered that the release of much larger green belt sites, with apparent complex ownership situations risks overlooking well located smaller omission sites such as Land West of Westminster Fields which can be delivered earlier in the plan period.
- 1.5 Land West of Westminster Fields, has a very simple ownership structure and the site is unconstrained. Ralph Catton Family Trust owns the site and Shanly Homes have

an Option on the land. Shanly Homes have a long track record of delivering high quality homes; indeed, the proposed allocation adjoins a recently completed high quality development by Shanly Homes at Tuffnell's Way.

- 1.6 As set out in the accompanying plan, the site can comfortably accommodate around 35 houses with space for meaningful high-quality amenity spaces and a high standard of accommodation. It is accessed from Tuffnell's way, which is also in the ownership of Shanly Homes. Housing can realistically be delivered within 1-2 years.
- 1.7 It is considered that the inclusion of sites such as this, alongside other medium sites will ensure deliverable housing provision earlier in the plan period and will comply with the requirement for local planning authorities to promote a good mix of sites as identified at paragraph 68 of the NPPF.
- 1.8 For the above reasons, it is considered that the proposed development strategy as set out in Policy S2 is not justified.

Q8. Should the Plan include some small and medium size sites in order to provide greater choice and flexibility and accord with NPPF paragraph 68?

- 1.9 Yes, it is considered that the submission plan is over-reliant on larger release sites that by their nature are a longer-term prospect with greater potential for delay. The plan should include a wider variety of site to introduce more flexibility and choice within the plan and to ensure release of housing earlier in the plan period. As it stands, it is considered that the plan is inconsistent with paragraph 68 of the National Planning Policy Framework.
- 1.10 Whilst the Land West of Westminster Fields omission site is greater than 1 hectare in overall site area and so would not fall strictly within the definition of small/ medium sites in the NPPF, the deliverability of the site and the amount of housing proposed is equivalent to the type of site envisaged by paragraph 68 of the plan. The lower density of housing proposed is commensurate with the characteristics of the site.
- 1.11 We have submitted a formal request to Louise St John Howe to attend the Stage 1 Hearings in order to enter into further discussion in relation to these matters.

Yours sincerely

Rosalind Gall MA MRTPI
Associate

