



ST ALBANS CITY AND DISTRICT– LOCAL PLAN 2020- 2036
EXAMINATION HEARING STATEMENT – MATTERS AND
ISSUES PART 1 – MATTER 3

**Prepared by Strutt & Parker (ID 1051550) on behalf of The
Gorhambury Estates Company Limited (ID 375996)**

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1. Introduction

- 1.1 Strutt & Parker are instructed on behalf of the The Gorhambury Estates Company Ltd to submit this summary statement to Examination for the St Albans City & District Local Plan 2020-2036 (ID Number 375996). Previous submissions on behalf of our clients' have been made to the St Albans City & District at the Regulation 19 stage and at earlier stages of the Local Plan process.
- 1.2 This summary statement seeks to address key issues and questions raised by the Planning Inspectorate in the Matters and Issues Part 1. We have not sought to repeat comments made at the Regulation 19 stage. It is noted that our comments at Regulation 19 stage regarding primary education and policy LS21, will be dealt with at stage 2 of the plan.
- 1.3 The Gorhambury Estates Company Limited previous representations relate to the following:
 - Land adjacent to Batchwood Drive, St Albans, which is an omission site within the Local Plan
 - Proposed Hemel Hempstead allocations at Hemel Hempstead, at Central and South having regard to the setting of the Gorhambury Estate.

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

1. *What is the basis for the overall spatial strategy and broad distribution of growth set out in policy S1? What options were considered and why was this chosen?*
- 2.1 St Albans and Harpenden have correctly been identified as category 1 settlements within the emerging Local Plan, which is supported.
- 2.2 As set out within our representation at Regulation 19 stage, we are concerned that the proposed Spatial Strategy, in terms of focusing the majority of growth around Hemel Hempstead and Park Street Garden Village will not address the objectively assessed housing need within St Albans and Harpenden, which are the settlements with the highest demand for housing growth in the City & District. It is therefore unclear why St Albans City & District is proposing to allocate the majority of its housing growth around Hemel Hempstead and Park Street Garden Settlement, which account for over 50% of the total housing growth, over the plan period. Whilst we have no objection to either the East Hemel or Park Street Garden Villages in general, it is considered that additional growth does need to be provided in the areas with the highest demand for housing.
- 2.3 In order to be sound it is considered that additional growth should be focused on St Albans and Harpenden, which would be consistent with their location at the top of the settlement hierarchy. Currently less than 25% of the total housing growth is proposed in St Albans and Harpenden, which is not consistent with their position at the top of the settlement hierarchy.
- 2.4 In addition, the Council should also seek to allocate smaller sites in order to accord with paragraph 68 of the NPPF and also ensure that the objectively assessed housing needs of the City & District are met within the short term. Further information on this is set out in paragraphs 2.5- 2.9.
3. *Should the Plan include some small and medium size sites in order to provide greater choice and flexibility and accord with NPPF paragraph 68?*
- 2.5 As set out within our Regulation 19 statement, it is considered to be imperative that St Albans City & District Council allocate additional smaller and medium sized sites, in order to accord with paragraphs 67 & 68 of the NPPF. At a very early stage of the plan making process, the City & District Council took the decision of not allocating any sites within the Green Belt with a site capacity less than 500 dwellings. This decision was not informed by a robust Green Belt Assessment or a Sustainability Appraisal. This approach is not considered to be sound, in that it does not accord with national policy, it is not justified in planning terms and it does not represent the most appropriate strategy when considered against the alternatives.
- 2.6 Currently almost 70% of the total 14,871 dwellings proposed over the plan period are made up of only 10 allocations within the City & District (three of which all relate to urban extensions in and around Hemel Hempstead). It is highly likely that all of the larger strategic allocations will be subject to a detailed and drawn out EIA, master planning and infrastructure delivery negotiation process. As a result, it is very unlikely that any

significant housing growth from the strategic allocations will come forward within the early part of the plan (first 5 years).

- 2.7 Conversely, according to St Albans City & District's own information within their 2018 housing position statement, they currently only have a 2.4-year housing land supply. This figure is considered to be optimistic, but either way is significantly below the governments minimum 5-year housing land supply target. St Albans City & District has also got a long history of not meeting its own objectively assessed housing need and therefore housing demand will be particularly high within the short term and during the early part of the plan period.
- 2.8 All of the area within St Albans City & District outside of development boundaries is within the Green Belt and therefore it is considered appropriate for smaller allocations within the Green Belt to be released. Allocation of a suitable number of smaller sites that are well related to the two key settlements of St Albans and Harpenden would have a significant benefit in meeting the housing needs of the District in the short term (first 5 years of the plan). It would also go some way to addressing the current conflict between the emerging Local Plan and paragraphs 67 and 68 of the NPPF.
- 2.9 Land to the west of Batchwood Drive would provide for a logical expansion to the existing development boundary of St Albans and also has the potential to deliver a new primary school adjacent to the optimal area for need as identified by Hertfordshire County Council.
- 2.10 We will expand upon the points above at the Examination in Public.