



ST ALBANS CITY AND DISTRICT– LOCAL PLAN 2020- 2036
EXAMINATION HEARING STATEMENT – MATTERS AND
ISSUES PART 1 – MATTER 4

**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 4 – The Metropolitan Green Belt (Policy S3)

1. *What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? Is the Council's approach to the Green Belt set out in its response to the Inspector's Initial Question 16 and letter of the 2 July 2019 robust and in line with national guidance?*
- 2.1 As set out within paragraph 136 of the NPPF, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.
- 2.2 We are content that the acute housing need within St Albans City & District justifies the exceptional circumstances for the release of development from the Green Belt. However, we are concerned that the Green Belt Assessment undertaken to support the Local Plan only assesses sites with a capacity of more than 500 dwellings. As a result, it is not clear if there are alternative sites within the Green Belt, which could have been allocated for development without compromising the openness of the Green Belt or the purposes of including land within the Green Belt, to the same extent as those allocated within the Local Plan. For example as set out within the Councils own Green Belt Assessment of the allocated sites, the vast majority will conflict with at least three of the purposes for including land within the Green Belt.
- 2.3 In addition, the Council's rationale for not considering sites of less than 500 units in size, appeared to be taken on the basis that smaller sites would not provide the community and infrastructure benefits that the delivery of housing on the larger allocated sites would. However, this approach is overly simplistic and not sound in planning terms for a number of reasons. There are a number of benefits associated with the release of some smaller sites, not least that they can be delivered in the short term to meet the current housing need. They also allow for additional competition in the housing market from small to medium sized house builders.
- 2.4 Specifically, in relation to land to the north of Batchwood Drive, St Albans, which is being promoted by The Gorhambury Estates Company Ltd, the land was promoted for residential development, but with land being made available for a 2 Form Entry Primary School. This site is a key example as to how a site of less than 500 dwellings, does have the potential to provide infrastructure benefits having regard to the land allocated for a primary school.
- 2.5 This site could have been allocated to deliver housing in the short term (first 5 years of the plan), providing housing in the area where it is most needed (St Albans) and also provide the opportunity for the delivery of a new primary school to meet the existing identified need for additional education provision within the City.
- 2.6 In order to be sound, as a minimum St Albans City and District need to undertake a review of all sites promoted for development as part of the emerging Local Plan and not just those with a site capacity of more than 500 dwellings. Once this has been undertaken a further review should then be undertaken to assess if some of the smaller sites are suitable to replace/provide additional housing above some of the strategic allocations within the plan.

This could also help provide additional growth in and around St Albans and Harpenden, as the two settlements with the highest need for additional housing.