
EXAMINATION STATEMENT – MATTER 06

St Albans City and District Council - Local Plan

Representations on behalf of:
Crest Strategic Projects
Bloor Homes
The Ivory family
Trustees of M E Simons 1999 Discretionary Trust
Mr Wimms
(ID: 1158079)

December 2019

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ST ALBANS CITY AND DISTRICT LOCAL PLAN

**REPRESENTATIONS ON BEHALF OF:
CREST STRATEGIC PROJECTS
BLOOR HOMES
THE IVORY FAMILY
TRUSTEES OF M E SIMONS 1999 DISCRETIONARY TRUST
MR WIMMS**

DECEMBER 2019

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CONTENTS

PAGE NO.

1.0	INTRODUCTION	01
2.0	RESPONSE TO QUESTIONS	03

APPENDICIES

APPENDIX 1 – Developers’ Delivery Programme for North-East Harpenden

1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore LLP on behalf of Crest Strategic Projects, Bloor Homes, the Ivory family, Trustees of M E Simons 1999 Discretionary Trust and Mr Wimms (referred to as “the developers”), who have land interests at North-East Harpenden, hereinafter referred to as “the Site”. The submitted St Albans City and District Council (SACDC) Local Plan earmarks the Site as a Broad Location for Growth (Policy S6 (vii)).
- 1.2 Representations have been made on behalf of our Clients throughout the production of the Local Plan, including to:
- i) Strategic Local Plan – Reg 18 Consultation (Nov 2014)¹;
 - ii) Publication Draft Local Plan – Reg 19 Consultation (Feb 2016)²;
 - iii) “Have Your Say” – Reg 18 Consultation (Feb 2018); and
 - iv) Publication Draft Local Plan – Reg 19 Consultation (Oct 2018).
- 1.3 The Local Plan was submitted (March 2019) after transitional arrangements for applying the 2012 NPPF ceased to apply and so the 2019 NPPF is wholly applicable to and reference is therefore made to the 2019 NPPF in responses to the Inspector’s questions, unless otherwise stated.
- 1.4 These representations respond to the Inspector’s questions (where relevant) within Matter 06 and have been considered in the context of the tests of ‘Soundness’ as set out in the NPPF (Para 35). The NPPF tests require that a Plan is:
- **Positively Prepared** – the Plan should provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – the Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – the Plan should be deliverable over the Plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with National Policy** – the Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

¹ This related to the Strategic Local Plan as withdrawn from Examination by SACDC (2017).

² As per footnote 1 above.

- 1.5 Notwithstanding the land interests of our Clients, these representations have been prepared in objective terms in recognition of prevailing planning policy and guidance, in particular the NPPF and Planning Practice Guidance.

2.0 RESPONSE TO MATTER 06 – BROAD LOCATIONS FOR DEVELOPMENT – GENERAL MATTERS / STRATEGIC INFRASTRUCTURE (POLICIES S6, L17 & L18)

Main Issues:

Whether the detailed policies for the development and delivery of the Broad Locations for development are justified, effective and consistent with national policy.

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for infrastructure needs of St Albans over the Plan period.

Whether it contains effective mechanisms to secure the provision of strategic infrastructure as and when it is needed.

Question 7. In allocating larger scale sites have the Council considered the advice in paragraphs 72 a – d of the NPPF? If so where can we find the evidence to support this.

2.1 The NPPF (Para 72) seeks for large urban extensions to be planned by having regard to:

- a) **“The opportunities presented by existing or planned investment in infrastructure, the economic potential of the area and the scope for net environmental gains;**
- b) **Their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself, or in larger towns to which there is good access;**
- c) **Clear expectations for the quality of the development and how this can be maintained (such as Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided; and**
- d) **A realistic assessment of likely rates of delivery, given the lead in times for large-scale sites, and identify opportunities for supporting rapid implementation”.**

2.2 We support SACDC’s selection/assessment of the Site at North-East Harpenden with regard to items a) – c) above. There are clear and compelling arguments for the Site having regard to these issues.

- 2.3 In terms of the NPPF (Para 72 - item d), the requirements of SACDC are two-fold:
- i) Assessment of delivery rates; and
 - ii) Assessment of lead-in times.
- 2.4 The delivery programme for the Site is addressed in our Matter 05, 07 and 08 Statements as well as at **Appendix 1**. In broad terms, the developers support the delivery rates (75dpa) proposed by SACDC. This is readily achievable with both developers coming forward on-Site in parallel.
- 2.5 The developers do not however support the lead-in time proposed by SACDC which proposes a commencement date of 2026/27 for the Site at North-East Harpenden. The reason for this is unsubstantiated in the evidence base (as detailed in our Matter 05 Statement).
- 2.6 Given that there are no on-Site constraints or wider infrastructure preconditions to development, the developers consider that the Site is able to come forward from 2022/23. This is set out in further detail in our other Matters Statements (to Matters 05, 07 and 08).

Question 9. Have the infrastructure requirements of the broad locations and other strategic infrastructure been adequately identified and costed in an up to date IDP? Including requirements for:

- a) Road improvements;***
 - b) Public transport systems and sustainable transport networks;***
 - c) Water supply and wastewater treatment;***
 - d) The provision of electricity/gas and other services;***
 - e) Primary healthcare;***
 - f) Schools and early years' provision;***
 - g) Green Infrastructure; and***
 - h) Leisure and sports facilities.***
- 2.7 The IDP does appropriately identify the infrastructure requirements for the Site. The IDP is a "live" document and further iterations to it can be made through the masterplanning stage of the proposals (as the scheme is progressed including Green Infrastructure provision, etc.).

- 2.8 The latest/submitted IDP has been informed by the developers' representations (to the Reg 19 Local Plan) which are referred to/detailed in the appendices to the IDP. This includes the potential for transport schemes/improvements³, potential for healthcare, Primary school, green infrastructure, leisure and sports provision.
- 2.9 In terms of costings, the IDP makes an assumption of £8.7m for the delivery of the new 2FE Primary School at the Site.
- 2.10 There are no further costings for the Site infrastructure (i.e. for Green Infrastructure, community facilities/health, Local Centre, etc.). This is not a criticism of the Plan as the scope of these infrastructure aspects will be better known at the masterplanning stage. Cost assumptions can be made/refined at that stage.

Question 12. Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?

- 2.11 The IDP includes broad timescales for the delivery of the infrastructure aspects from the Site. This assumes delivery of the Primary school, Green Infrastructure and Community provision from years 10 – 15 of the Local Plan trajectory (i.e. 2029/30 – 2033/34). This is based on the assumption that commencement (housing) on-Site occurs from 2026/27.
- 2.12 As confirmed earlier, the developers consider that delivery can occur earlier than this (i.e. 2022/23). As aligned with this earlier timetable, the infrastructure aspects could also be built out earlier. The Crest/Bloor delivery programme (**Appendix 1**) allows for delivery of the 2FE Primary School/Early years and Local Centre from 2024/25 – 2026/27. These are considered to be realistic timescales and the delivery of Green Infrastructure can also come forward within this period.

³ As indicated in the Transport Strategy, Vectos, Oct 2018.

APPENDIX 1

Developers' Delivery Programme for North-East Harpenden

LAND AT NORTH-EAST HARPENDEN INDICATIVE HOUSING DELIVERY (OCTOBER 2018)



Year	Dwellings Delivered*	Cumulative Delivery	Supporting Infrastructure to Meet On-Site Needs
2020/2021	LOCAL PLAN ADOPTION / OUTLINE PLANNING APPLICATION		
2021/2022	RESERVED MATTERS APPLICATIONS / CONDITION DISCHARGE / SECTION 106 OBLIGATIONS		
2022/2023	COMMENCE ON SITE		
2022/2023	50	50	
2023/2024	80	130	
2024/2025	80	210	2FE Primary School / Early Years
2025/2026	80	290	Local Centre inc. GP Surgery / Flexi-care scheme
2026/2027	80	370	
2027/2028	80	450	
2028/2029	80	530	
2029/2030	80	610	
2030/2031	80	690	
2031/2032	70	760	

*Encompassing: - Flexi-care scheme
 - Special needs accommodation
 - Self/Custom build

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