

**MATTER 6: THE BROAD LOCATIONS FOR  
DEVELOPMENT (POLICY S6) – GENERAL  
MATTERS (POLICY S6) AND STRATEGIC  
INFRASTRUCTURE (POLICIES L17 AND L18)**

**HEARING POSITION STATEMENT SUBMITTED ON BEHALF OF  
BURHILL DEVELOPMENTS LTD**

**St Albans City & District Council – Local Plan Examination in Public**

Contents

1 Introduction.....3

2 Main Issues – Whether the 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. ....3

Question 1.....3

Question 3.....4

## 1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared in response to the Inspector's published 'Matters, Issues and Questions' (MIQs) on behalf of Burhill Developments Limited (BDL) who own both Aldwickbury Park Golf Club and Redbourn Golf Club. On behalf of BDL, we have promoted both sites for residential development to each stage of the emerging Local Plan and most recently, the Regulation 19 (Publication Draft) (September 2018) where comment was made on the soundness of the spatial strategy within the Plan and matters of its legal compliance. This submission must be read in the context of, and in conjunction with those duly made representations.
- 1.2 Whilst we confirm BDL considers both sites are available, suitable, viable and deliverable for residential development now, Aldwickbury Park Golf Club (the 'Site') is considered to be particularly well placed to provide a high quality residential development forming a sustainable extension to Harpenden (a Category 1 settlement) in accordance with the Spatial Strategy and Settlement Hierarchy as outlined in Policy S1.

## 2 MAIN ISSUES – WHETHER THE 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.

- 2.1 We respond to the specific questions arising in relation to Matter 6 below.

### **Question 1. How were the broad locations for development selected, and what evidence documents were produced to inform their selection?**

- 2.2 As set out in our response to Matter 4 (Issue 1), Questions 1 and 2, we consider the approach the Council has taken to review its Green Belt boundaries is not robust and as a consequence, the way in which the broad locations have been selected is neither justified, effective or consistent with national policy.

**Question 3. Is the Sustainability Appraisal of the options for the broad locations robust?**

- 2.3 Whilst we consider the Sustainability Appraisal and the approach taken to the criteria based assessment to be robust, there is no evidence that reasonable alternatives have been assessed in accordance with the requirement of paragraph 35 of the NPPF. We therefore request the Council publish evidence of the reasonable alternatives that have been considered and the supporting assessments in order to establish whether or not the decisions based on the Sustainability Appraisal are sound.