
EXAMINATION STATEMENT – MATTER 07

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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APPENDIX 2 – Transport Strategy (Vectos, Oct 2018)

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 07 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 07 – BROAD LOCATIONS FOR DEVELOPMENT – SPECIFIC MATTERS (POLICY S6 (VII) – NORTH EAST HARPENDEN)

Main Issue: Whether the detailed policy for each Broad Location for development is justified, effective and consistent with national policy.

An Urban Extension of Harpenden

Question 1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?

- 2.1 A Statement of Common Ground (SOCG) has been signed between SACDC and the North-East Harpenden site promoters (i.e. Crest, Bloor, Mr Wimms and Mr Scott). The SOCG confirms the suitability of the Site for housing as well as the commitment from all parties to bring the Site forward for development.
- 2.2 The Site at North-East Harpenden has been actively promoted since 2014 through the Plan-making process. During this period the appointed specialist consultant team has provided detailed technical, environmental and design input to the proposals. This information has been submitted to SACDC at each consultation stage of the Local Plan.
- 2.3 The technical studies prepared to inform and support the proposals have been encapsulated into the Vision Document for the Site (**Appendix 1**). The submitted technical material demonstrates that there are no constraints to developing the Site. Set out below is a summary of the key matters considered as well as the mitigation measures identified, where relevant.

i) Highways and Access

- 2.4 The Site can readily provide sustainable transport links for new and existing residents to access the Site and the community/education/environmental facilities/provisions that will be provided as well as access to the existing community/education facilities in the local area, including the following:
 - Ability to secure primary accesses to the Site from Lower Luton Road;
 - Potential secondary vehicular access points also onto Lower Luton Road, Bower Heath Lane and Noke Shot;
 - Provision of pedestrian/cycle links, including on to Common Lane (inc. potential emergency access on to Common Lane) to enhance connectivity between the Site and

other potential development sites, as well as to the existing secondary school (Katherine Warington school). This includes connections to public transport facilities including bus stops along Lower Luton Road.

- 2.5 A significant proportion of school trips from the Site will be made by sustainable means, thereby reducing the potential for highway impacts. Secondary school aged children from the Site will be able to be accommodated in the nearby school (Katherine Warington school immediately to the east) and Primary provision will be secured on-Site. The mixed-use nature of the proposals for the Site would also encourage future residents to use on-site facilities thus reducing the need for off-site/private motor travel.
- 2.6 A number of potential transport and highway improvements/mitigation measures are addressed in the attached Vectos (Oct 2018) Transport Strategy (**Appendix 2**). This include potential for public transport improvements along Lower Luton Road as well as potential for junction improvements in the locality of the Site. These measures will be subject to further assessment later in the development process and further discussion with SACDC and Herts County Council.

ii) Landform

- 2.7 The slope of the western half of the Site has limited visibility from the surrounding landscape and from existing residential development.
- 2.8 The eastern half of the Site effectively sits on a plateau, with ground levels dropping slightly towards the eastern edge. This area of the Site is largely flat and visible from the countryside to the south and north-west. Views from the countryside are nonetheless partially screened through the presence of field patterns and boundary planting.
- 2.9 The southern element to the Site lies adjacent to the confines of the urban development at Batford and development of the Site could achieve a successful integration with the existing urban fabric as confirmed in the Vision Document.

iii) Landscape

- 2.10 Hertfordshire County Council's (HCC) Landscape Character Assessment (LCA) (2000-2005) identifies the Site as being located within two LCA's – Upper Lea Valley (LCA033) and Blackmore End Plateau (LCA034).

- 2.11 The Upper Lea Valley (LCA033) is described as a marked valley form with a narrow river corridor. Whilst there are recognised to be extensive views into the area from adjacent plateau areas, these are interrupted by the built edge of settlements and belts of trees and small woodlands. The condition of the landscape and strength of character are both described as “moderate”.
- 2.12 The Blackmore End Plateau (LCA034) is described as an elevated plateau with extensive arable fields. Due to the level and elevated landform, the area is only locally visible from surrounding areas with a good network of local footpaths and bridleways. The condition of the landscape and strength of character is again described as “moderate” and therefore not a constraint to development of the Site.

iv) Ecology

- 2.13 No identified statutory ecological designations are present within or in close proximity to the Site. Similarly, no non-statutory ecological designations are present within the Site.
- 2.14 The Site largely comprises horse-grazed pasture along with a number of buildings. Few ecological constraints are present and where identified can be readily incorporated into any sensitively designed layout.

v) Drainage

- 2.15 The majority of the Site is located in Flood Zone 1 and is therefore suitable for development.
- 2.16 A small portion of the south-western part of the Site, where it is adjacent to the B653/Lower Luton Road, is located in Flood Zone 2.
- 2.17 The proposed development provides an opportunity to improve the existing situation in terms of flood potential, through the detailed design of the small Flood Zone 2 parcel.
- 2.18 The soil conditions at the Site are suitable for the use of sustainable urban drainage systems (SuDS), including potential for attenuation basins and soakaway infiltration, which will capture overland flows from hard-surfaced areas and secure runoff at greenfield rates.
- 2.19 There are thus no constraints to the Site in terms of drainage/flooding.

vi) Archaeology

- 2.20 The Desk-Based Archaeology (DBA) Assessment which has informed the developers' Vision Document confirms that the Site has remained as largely open or agricultural land throughout the historical periods, with development (equestrian uses) restricted to the western part of the Site.
- 2.21 The Site is thus considered to have a "very low" to "low" archaeological potential for all past periods of human activity, as confirmed by the DBA. Post-Medieval field boundaries set out in the C19th may be present but are of low intrinsic value.

vii) Summary

- 2.22 It is clear that the evidence submitted throughout the Plan-making process and SACDC's own evidence confirms that there are no constraints to Site delivery. The Site is therefore suitable for residential development.

Question 2. What evidence is there to demonstrate that the proposed Broad Location is capable of delivering 760 dwellings?

- 2.23 Over the course of Local Plan promotion, the developers have worked up illustrative masterplan proposals for the Site. These have been informed by the previously noted technical studies and through discussions/meetings with SACDC and other stakeholders.
- 2.24 SACDC has undertaken its own Site assessment as part of the SHLAA and Development Site and Strategy Options Evaluation (DSSOE) processes. These are not repeated here in full, however the DSSOE document assessed the Site and identified the ability of the Site to achieve a greater quantum of development (900 dwellings). It is therefore clear that the scheme can achieve a minimum of 760 dwellings.
- 2.25 The Vision Document (**Appendix 1**) provides illustrative masterplan proposals and which has regard to SACDC's evidence base/objectives. The Vision Document demonstrates the ability of the Site to deliver in the region of 760 dwellings as well as securing other uses and green space, etc. The Site proposals will be able to achieve SACDC's objective of 40dph as well as securing 40% of the Site area for green/open space provision.
- 2.26 The evidence is therefore clear that the proposed Broad Location is capable of delivering 760 dwellings and at the densities sought by SACDC.

Question 3. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

- 2.27 SACDC's IDP sets out the infrastructure programme for the Site including the timescales for delivery (as addressed in our Matter 06 Statement). The IDP confirms that no wider strategic level infrastructure is required to be delivered in advance of the Site coming forward.
- 2.28 The IDP forms a "live" document and can be updated through the masterplanning process should further issues/elements come to light through consultation with residents, statutory consultees, etc. Infrastructure costs can also be better understood at the masterplanning stage.
- 2.29 Moreover, as confirmed through our Reg 19 representations a significant amount of work has already been undertaken to establish the infrastructure requirements of the Site. This has evolved through the DSSOE process, in establishing the educational, health and open space requirements, as well as through the Green Belt Review (regarding open space). The infrastructure requirements have also been informed through discussions/meetings with SACDC and Herts County Council. The requirements have thus subsequently (and correctly) been identified in the IDP.
- 2.30 It is therefore considered that should any further infrastructure issues/requirements come to light during the Examination (or subsequent to this), these can be appropriately identified through the masterplanning stage.

Question 4. Should the policy refer specifically to the provision of sports facilities?

- 2.31 The developers are not necessarily averse to this, however, the ability of sites to secure sports facilities is already addressed at emerging **Policy L28** – Green Space Standards and New Green Space Provision.
- 2.32 **Policy LP28** is a development management policy which addresses/sets standards for the open space/sport facility requirements for sites. This policy can be relied upon for securing appropriate sports facilities at the Site.

Question 5. How have heritage assets been considered and is a Heritage Impact Assessment required?

- 2.33 There is a single Grade II listed building (Red Cow Public House) in proximity to the Site (c. 102m from the Site). There are other listed buildings further to the east of the Site (c. 500 – 600m) at Mackerye End. The Conservation Area of Harpenden is a considerable distance to the south (c. 600m to the south).
- 2.34 The heritage implications for the Site have been assessed by SACDC as part of the DSSOE exercise and the Sustainability Appraisal (SA).
- 2.35 The DSSOE correctly concludes that no heritage / archaeology constraints are present at the Site.
- 2.36 The SA goes on to assess the Broad Locations as against Social, Economic and Environmental indicators, in terms of 4no. scoring criteria as follows:
- No significant relationship (very positive);
 - Compatible (positive);
 - Uncertain (neutral); and
 - Potentially incompatible (negative).
- 2.37 The SA assessment includes an indicator on “Historic Environment” and confirms that the North-East Harpenden Broad Location has “no significant relationship” (i.e. very positive) in terms of impact on heritage assets.
- 2.38 A Heritage Assessment will be submitted as part of future planning application for the Site. This will assess the Site as against local heritage assets with regard to setting and significance. Outline/Full/Reserved Matters proposals will be informed by this assessment and this can be tested as against emerging **Policy L30** (Historic Environment) as well as the NPPF (Section 16 – Conserving and Enhancing the Historic Environment).

Question 6. Is the site suitable for development in relation to flood risk?

- 2.39 Yes, as indicated above, the large majority of the Site is located in Flood Zone 1 and is therefore suitable for development.
- 2.40 Only a small portion of the south-western part of the Site, where it is adjacent to the B653/Lower Luton Road, is located in Flood Zone 2.
- 2.41 The proposed development provides an opportunity to secure “betterment” in terms of flood potential at the south-western element of the Site.

- 2.42 This can be achieved through the use of SuDS and capturing/storing run-off from the Site and from downstream.

Question 7. Has consideration been given to air quality and any mitigation measures?

- 2.43 There are no air quality management areas (AQMAs) in Harpenden. It is therefore a suitable location for development in SACDC.
- 2.44 Air quality has been accounted for as part of the SA which includes an air quality indicator. This concludes air quality impacts of development as being neutral due to inevitable increases in emissions, however due to the location of the Site close to existing facilities and services (and facility/service provision on-Site) this would counter the adverse effects³.

Question 8. Should specific provision be made for a new neighbourhood centre?

- 2.45 The illustrative masterplan proposals (**Appendix 1**) produced by the developers includes a Local Centre with the potential for a community centre, retail opportunities and healthcare facilities to be provided. These proposals have been worked up in tandem with discussions/meetings with SACDC and other stakeholders.
- 2.46 The details of these provisions will be refined further during the masterplanning process with SACDC and other stakeholders.

³ Refer to SACDC SA (Page 41).

APPENDIX 1

North-East Harpenden "Vision Document"



Crest
NICHOLSON

BLOOR HOMES®

Vision Document

February 2018



GREEN ACRES

Land at
North East
Harpenden

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Introduction 01



GREEN ACRES

Introduction

1.1 Purpose

North East Harpenden provides an opportunity for a sustainable urban extension to help meet the Council's housing needs. The site is currently being promoted by Crest Strategic Projects (CSP) and Bloor Homes who are proposing a collaborative process towards bringing forward comprehensive mixed use development proposals.

This document should be read alongside the 'Representations to St Albans City & District Local Plan - "Have Your Say" Consultation' for the Land at North-East Harpenden.

The land at Greenacres, North East Harpenden (hereby referred to as 'The Site') was previously promoted to the Strategic Local Plan (SLP) and was identified as one of 8 No. Broad Locations within the Green Belt. Such locations were addressed in the evidence base to the SLP including in the Green Belt Review Sites and Boundaries Study (SKM – Feb 2014), and Development Site and Strategy Options Evaluation (Oct 2014). The Site reference was S6: North-East Harpenden.

The SLP did not progress beyond the initial Examination session, and thus a new Local Plan is being progressed with the "Have Your Say" Consultation.

This document provides the following information:

- An overview of Crest Strategic Projects and Bloor Homes and their suitability for this development;
- A description of the Site and its surroundings, including an assessment of existing local amenities and connections, and existing settlement pattern and character;
- The current Planning Policy context;
- An appraisal of the Site, including initial technical studies, which demonstrate that the Site is suitable for development;
- Information on the emerging development proposals including a 'Concept Masterplan'; and
- A summary of the Social and Economic Benefits of the proposed development.



Introduction

1.2 Site Description

The Site is circa 42.76 hectares and lies to the North East of Harpenden, within the Metropolitan Green Belt, as defined by SACDC's Local Plan Review (1994) Proposals Map.

The majority of the Site is greenfield, with an informal single-lane track through the centre of the Site leading to the on-site Equestrian Centre. A telecommunication mast is also presently located in the centre of the Site.

The Site is bounded by roadways, including B653/Lower Luton Road along the south-west boundary, with the River Lea beyond, B652/Bower Heath Lane adjacent to the western boundary and Common Lane adjacent to the north-east boundary.

Residential development is located to the south and west of the Site (Harpenden Town), with dispersed residential dwellings and agricultural fields located to the north and east.

Kings Heath Park, a cluster of dwellings for residents over 50 years of age (approximately 15no. in total), is located immediately adjacent to the north-west Site boundary with access obtained from B652/Bower Heath Lane. Existing allotments are located adjacent to the south-eastern Site boundary, managed by Harpenden Town Council.



Site Location

Introduction

1.3 About Crest Nicholson

Crest Nicholson is a FTSE-250 company which has acquired a top level reputation for developing high quality housing within well-conceived masterplans for over 50 years across the south of England. Crest Nicholson's driving ambition is to be the market leader in the design and delivery of sustainable housing and mixed use communities.

We aim to improve the quality of life for individuals and communities, both now and in the future, by providing better homes, work places, retail and leisure spaces within which they aspire to live, work and play. Our mission is to:

- be the development partner of choice for both the public and private sectors
- deliver high levels of customer satisfaction through excellent design, sound construction, quality materials and professional, courteous service
- deliver developments which are environmentally, socially and economically sustainable and for the buildings, public realm and tenures to integrate to form desirable, harmonious and viable communities
- apply new and evolving technologies and skills to raise continuously the sustainability standards of our developments and facilitate a greener lifestyle for our purchasers
- commit to the progressive reduction of our carbon footprint through corporate policies that seek to minimise energy consumption
- be an ethical and progressive employer which encourages a culture of openness, creativity and continuous professional development and which rewards the effectiveness and loyalty of our employees
- commit to the measurement of our progress against these goals and regularly share our findings with all our stakeholders
- exercise responsibility and environmental stewardship in our dealings with all our stakeholders and aim to balance their interests over time

By being awarded the accolade of “Sustainable Housebuilder of the Year” and “Large Housebuilder of the Year” two years running (2015/16) at the Housebuilder Awards, we have proven that such objectives are backed up by our actions. Furthermore, for the last four years we have come either first or second in the Next Generation benchmark, the only independent sustainability benchmark of the 25 largest homebuilders in the UK.

We will follow Garden Village design principles, which have been developed in conjunction with the T CPA. This is a design principle that has been followed by Crest Nicholson in successful active developments as illustrated in the accompanying ‘About Crest Nicholson’ document.





Case Study 1: Bath Riverside, Bath

Set on the banks of the River Avon close to the historic centre of Bath, a World Heritage City, this is a stunning collection of new homes. Working in partnership with Bath and North East Somerset Council, Somer Housing Trust, and the Homes and Communities Agency, Bath Riverside is providing over 2,200 units as well as other mixed uses. Shared communal gardens are a key feature along with herb and sensory gardens, play areas promoting healthy and sustainable living.

This scheme is an example of achieving a modern design within a sensitive setting. The design blends historic materials with contemporary elements and pioneering design. Taking its cue from Bath's traditional vernacular and material palette, it has been predominantly built using Bath stone, which has been sustainably sourced from a local quarry. The use of this iconic material makes the buildings instantly recognisable as part of Bath's landscape and ensures it blends with its surroundings. Bath was recently granted winner of 'Best House Design' at the Sunday Times British Homes Awards 2016 and Best Development at the WhatHouse? Awards 2017.



Case Study 2: Oakgrove Village, Milton Keynes

Oakgrove is a new community in Milton Keynes incorporating residential, retail, community and education uses in a generous landscaped setting. Oakgrove has been a highly successful development, winning support from local residents, the council and the landowner – the Homes and Communities Agency. Oakgrove is providing 942 houses and apartments, a neighbourhood centre including a Waitrose supermarket, Metrobank, Costa Coffee and dentist, a new primary school, and extensive landscaping with a wildlife corridor and country park.

The development includes a variety of character areas and unit types with density ranges from 15 dwellings/ha to 65 dwellings/ha catering for all price points in the market from first time buyers looking for their first apartment and to executive homes within private and exclusive parcels within the site creating a unique sense of place across the scheme.



Case Study 3: Tadpole Garden Village, Swindon

Tadpole Garden Village is a functioning example of how a Garden Village is delivered in the 21st Century. The vision for Tadpole was to create a settlement based on Ebenezer Howard's model of a garden city, with Garden Village principles embedded at its heart capturing character, quality of design, an interesting street scene, connectivity, and legibility as important elements of the development.

As well as delivering 1,695 homes, it will offer a wide range of services and facilities which will make the village highly sustainable, including local shops, a primary school, a secondary school, community facilities, public open space, allotments and a new nature park. A Community Interest Company has been established as the long term stewardship and management model and this has been awarded "Best Community Initiative" at the Housebuilder Awards 2015/16.

Introduction

1.4 About Bloor Homes

Bloor Homes was formed in 1962 by John Bloor, and now has 55 years' experience in promoting and developing major housing schemes across the UK. Bloor Holdings Limited, through a combination of Bloor Homes and Triumph Motorcycles has a combined turnover of £1.4bn per annum and remains a financially independent and family owned business operating on the basis of very low financial gearing.

Bloor is the UK's largest privately owned housebuilder completing 3,500 homes in 2016-2017. The company operates from seven regional offices based in Newbury, Swindon, Tewkesbury, Tamworth, Bury St Edmunds, Northampton and Holmes Chapel with a Head Office in Measham, Derbyshire. Bloor's long term ownership and structure provides certainty which is not susceptible to change or disruption from external factors.

Bloor Homes has a streamlined and effective management structure that ensures agile decisions across the business. In a world of increasing corporatisation, this sets the business apart from the majority of our competitors, enabling rapid responses to changing circumstances to meet both the needs of our Business and our Partners.

The Company has an exceptional track record in the delivery of Strategic Land, and generates over 60% of its housebuilding output through self-sourced Strategic Land, successfully promoted through the Planning System and converted into development sites. This level of Strategic Land delivery represents a sector leading output, something about which the company is very proud.





