

HALLAM LAND MANAGEMENT LIMITED
ST ALBANS SCHOOL
ST ALBANS SCHOOL WOOLLAM TRUST

Woollam Park

Planning Statement

February 2025



PLANNING
LIMITED

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Executive summary

1. Hallam Land Management Limited, St Albans School and St Albans School Woollam Trust (“the applicants”), have submitted an outline planning application for a residential-led mixed-use development at Woollam Park.
2. The application seeks outline planning permission with all matters reserved, apart from the means of access to the site and the details associated with proposed playing fields with a sports pavilion annex.

The application site

3. The application site is the major part of the longstanding North St Albans Broad Location, identified in successive consultation documents prepared by St Albans City and District Council as part of its emerging Local Plan. Planning permission has already been granted for the adjacent Sewell Park in 2022.

The applicants' vision

4. The applicants have been working collaboratively with the local planning authority (“LPA”) for a number of years and there is a shared vision to establish a long-term strategic approach to accommodating growth that meets the specific needs of the location and its population, caters for emerging lifestyles, energy, mobility requirements and fully embraces the challenges of the future.
5. To help deliver this vision, a ‘manifesto’ has been developed to inform the masterplan and this planning application. This will shape the proposals through all stages of the design and planning application process, including design coding, schemes to be approved via planning conditions, reserved matters approvals, planning obligations, implementation and stewardship.

The proposed development

6. The proposed development comprises the following components:
 - a. up to 1000 new homes (C3) of which 40% shall be affordable housing and 3% would be self-build, and shall include four adult disability service units and up to 80 apartments for age restricted specialist accommodation for the elderly;
 - b. an 80 bed care home (C2);
 - c. a local centre providing retail, employment and community facilities, healthcare, and a mobility hub centred around a new civic space;
 - d. a two-form entry primary school;
 - e. over 17 hectares of accessible greenspace including a linear park providing areas of amenity open space, children’s playspace, habitat creation, sustainable drainage, and community growing space and/or allotments;
 - f. the relocation of an area of playing fields to Longcroft and the construction of a two-changing room sports pavilion annex;
 - g. formalisation of the existing over-spill car park for temporary and occasional use of Woollam Playing Fields;
 - h. a new all-modes access constructed onto Harpenden Road and the introduction of modal filters on Sandridgebury Lane and Valley Road;
 - i. internal roads, cycleways, footways and drainage infrastructure; and
 - j. the creation of a new footway and cycleway extending from Sandridgebury Lane to the Hertfordshire Way.

Pre-application discussions and community engagement

7. The scheme and the masterplan have been subject to extensive pre-application discussions with St Albans City and District Council and Hertfordshire County Council, which have run parallel with community and other stakeholder engagement. The scheme has evolved to take account of this engagement and the applicants will continue to liaise with all the key stakeholders.

Accordance with the development plan

8. The proposed development exhibits a high degree of conformity with the development plan's policies.
9. Whilst the site is within the Green Belt, inappropriate development is permissible where very special circumstances exist. If this circumstance is proven to exist in this instance, as the applicants contend, the proposed development would accord with Policy 1 of the 1994 Local Plan and national planning policy.
10. In terms of the spatial strategy, the development reinforces the settlement hierarchy which has St Albans at its pinnacle. This will result in a sustainable pattern of development that reflects Policy 2 of the 1994 Local Plan and national planning policy.
11. In other respects, it is evident that the proposed development accords with the Local Plan and Neighbourhood Plan's development management policies to the extent that they are relevant to an outline planning application. Many aspects of the proposed development deliver benefits that contribute positively to the achievement of the underlying policy objectives.
12. The policies in the Waste Local Plan are most relevant to the construction stage and layout matters. The presence of some minerals resource is not considered to represent a reason to refuse planning permission.

Material planning considerations

13. There is an identified need to increase the supply of new housing in the District as has been acknowledged in the determination of various planning applications and appeals. The District Council only demonstrate 1.7 years supply of housing land and has for a number of years failed the Housing Delivery Test measurement.
14. This circumstance has arisen because of the aged nature of the 1994 Local Plan, the absence of new development allocations in any up-to-date Local Plan to meet present and future development requirements, and the low levels of housing completions over many years relative to evidence of local housing need. The proposed development will make a notably important contribution to improving housing supply in the short term and providing surety of supply over the longer term.

Very special circumstances

15. The proposed development is within the Green Belt.
16. The Green Belt's boundaries are effectively those drawn in the 1994 Local Plan and are now over 30 years old. Whilst they have endured for that period of time, it is widely accepted that development of land currently within the Green Belt is inevitable if present and future development needs are to be met.
17. In this location, the Green Belt's functions, whilst not insignificant, are limited, and importantly the development would not result in coalescence between St Albans and Harpenden. Even with the proposed development, the separation between these two settlements will be maintained and the established spatial pattern retained.
18. The openness of the application site would be lost, but its boundaries serve to contain development to such an extent that it would not represent sprawl and openness beyond the application site would be retained and the visual effect of the development is especially limited.
19. The proposed development would represent encroachment into the Green Belt but that is true of any such development and is inevitable if identified development needs are to be met at St Albans; this circumstance militates the extent to which this is a decisive factor.

20. Policy 1 of the Local Plan and the National Planning Policy Framework (NPPF) permit new development in the Green Belt where very special circumstances exist. In a number of other instances, including Sewell Park, planning permission has been granted for new development in the Green Belt on this basis. The circumstances that supported those decisions - particularly the persistent paucity of housing land supply, low levels of housing delivery, acute levels of affordable housing need and exceptionally poor affordability - remain highly germane.
21. Moreover, the emerging Local Plan has been formulated on the basis that new development will need to occur on land subject to the Green Belt, including the application site, which has the advantage of being well-located to the services and facilities at the pre-eminent settlement in the district.
22. The foundational elements of the very special circumstances can be summarised as follows.
 - a) There is no “up-to-date” Local Plan to guide current and future development in St Albans.
 - b) The boundary of the Green Belt is delineated in the context of the aged development needs over the period to 2001.
 - c) There is a demonstrable need to increase housing supply in the District.
 - d) The Council has failed to meet the two measures of housing supply in the NPPF for successive years.
 - e) Housing affordability is especially acute.
 - f) There is an identified need for family sized housing.
 - g) Additional land will need to be identified to meet local housing need.
 - h) Future housing land will need to be provided on land currently within the Green Belt.
 - i) There is no genuine alternative to development in the Green Belt.
 - j) The new Local Plan will not amend the Green Belt boundary until 2026 at the earliest.
 - k) Meanwhile, there is no remedy to the marked and intractable shortage of housing land supply without planning permission being granted on land within the Green Belt.
23. Whilst the development will cause harm to the Green Belt by reason of inappropriateness, and this attracts *substantial negative weight*, this and other harms are, in this instance, outweighed by the proposed development's many benefits.
24. The very substantial housing benefits are notably important. Allied to this are other significant social, economic and environmental benefits; local job creation and increased local expenditure, biodiversity net gain, habitat creation, investment in social infrastructure and active and sustainable modes of travel and net zero development. These benefits reflect the high degree of compliance with the emerging Local Plan.
25. Taken together, very special circumstances exist to warrant planning permission being granted.

Planning obligations

26. The applicants anticipate a comprehensive list of planning obligations which have been identified in the accompanying draft heads of terms. Planning obligations, along with planning conditions, can be used to ensure the proposed development is acceptable. Such obligations are likely to cover, *inter alia*, the provision of affordable housing, self and custom build plots, the provision of community infrastructure, the laying out of green infrastructure, financial contributions towards community infrastructure and pedestrian and cycle improvements, stewardship and governance.

Planning balance and conclusion

27. Every planning decision requires a balance to be struck between social, economic and environmental considerations. In this instance, the proposed development has been carefully conceived and strikes a wholly appropriate balance. Given the circumstance where there is an inescapable need to increase the supply of new housing, and that, notwithstanding the application

site's Green Belt status, the environmental effects are limited, the balance leans firmly in favour of granting planning permission.

28. For the reasons set out in this Planning Statement, and given the absence of an up to date Local Plan and the status of the application site in successive versions of the emerging Local Plan, the notably important benefits that arise from the proposed development outweigh the harm to the Green Belt and other harm.
29. Consequently, very special circumstances exist to justify the grant of planning permission.
30. Therefore, in the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004, having regard to both the development plan and material considerations, planning permission for the proposed development should be granted.

1 Introduction

- 1.1 Hallam Land Management Limited (Hallam), St Albans School and St Albans School Woollam Trust (together, the School), are seeking planning permission for a residential-led mixed-use development at Woollam Park, to the north of St Albans.
- 1.2 Woollam Park is the major part of the North St Albans Broad Location identified as a proposed allocation in the emerging Local Plan presently being prepared by St Albans City and District Council.

The application site

- 1.3 The application site, shown at *Appendix 1*, measures 50.30 hectares in size. It comprises primarily agricultural land situated north of Longspring Wood, west of the Midland Main Line railway line, and astride Sandridgebury Lane. To the east of the application site is land which already benefits from outline planning permission for new housing, referred to as Sewell Park. An area of five hectares, adjoining Harpenden Road, is currently used as playing fields that are to be relocated as part of the proposed development.

The proposed development

- 1.4 Planning permission is sought for the following proposed development:
 - (1) *Relocation and replacement of existing playing fields and erection of pavilion annex; and*
 - (2) *Construction of up to 1000 new homes (Use Class C3) to include a mix of market housing, affordable housing, age restricted specialist accommodation for the elderly, adult disability service units; a care home (Use Class C2); a local centre (Use Classes E and F); a primary school (Use Class F); the laying out of green infrastructure including habitat creation; drainage infrastructure; earthworks; pedestrian and cycle routes; new means of access and alterations to existing accesses.*
- 1.5 The submission comprises a “hybrid” planning application, whereby the majority of the application is submitted in “outline” with all matters reserved for future consideration, and the remaining elements are submitted in “full” detail. The form of the planning application is explained in the Scheme Specification and Parameters Document submitted as part of the planning application.

Parameter plans

- 1.6 A suite of parameters plans has been prepared which provide the framework for subsequent reserved matters approvals as part of the multi-stage consent.
- 1.7 In the event planning permission is granted, these will be approved plans, and those later stages will need to be in accordance with them. These parameter plans are also the foundation of the applicants' Environmental Impact Assessment (EIA).
- 1.8 Adopting a ‘parameters approach’, allows for a degree of flexibility with regard to, for example, the detailed design of the development, whilst ensuring that the EIA is appropriate and legally robust.

Environmental Impact Assessment

- 1.9 The proposed development is EIA development as defined by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 1.10 St Albans City and District Council (the LPA) adopted a Screening and Scoping Opinion in September 2024.
- 1.11 An Environmental Statement (ES) has been prepared which accompanies the planning application that considers the likely significant environmental effects of the proposed development.

Planning history

- 1.12 The Broad Location at North St Albans has a notable planning history. It was first identified by the District Council as a potential development location during the preparation of a new Local Plan in 2014 and was a proposed allocation in the 2018 Local Plan. Neither of these Local Plans were adopted by the LPA.
- 1.13 North St Albans has again been identified as a proposed Broad Location in Regulation 18 Local Plan of July 2023 and Regulation 19 Local Plan of September 2024. The emerging Local Plan is intended to provide a planning strategy, policies and proposals for the period to 2041.
- 1.14 Outline planning permission was granted for residential development at Sewell Park for up to 150 homes in January 2022; this land is located within the North St Albans Broad Location and its masterplan is taken into account in these proposals to ensure a comprehensive form of development.

Public engagement

- 1.15 In 2019 and 2020, the LPA, working collaboratively with Hallam, the School and Hunston Properties undertook public consultation associated with a masterplan for the North St Albans Broad Location. This generated opinions about the location of this development and what it should comprise to meet local priorities.
- 1.16 More recently, further public consultation has been undertaken by Hallam and the School. As described in the accompanying *Statement of Community Involvement* a project website was set up which provided information about the emerging development proposals. Meetings with key stakeholders have been undertaken, and two public exhibitions have been held – one close to the site in New Greens and one in the city centre at the Alban Arena.
- 1.17 As part of its major projects initiative, the District Council also organised a members' briefing, at which the applicants presented the emerging proposals to the Planning Policy Committee, and ward and parish councillors.

Pre-application discussions

- 1.18 The applicants have held pre-application discussions with the District Council and Hertfordshire County Council. These discussions have covered:
- (1) the form of the planning application;
 - (2) the component parts of the proposed development, including housing types and tenures, community uses, green infrastructure, playing fields, and the local centre;
 - (3) landscape, ecological and heritage considerations;
 - (4) important urban design considerations associated with this stage of the planning process;
 - (5) the likely traffic and transportation effects and mitigation measures on-site and routes to key destinations; and
 - (6) surface water drainage.

Decision-making framework and planning policy context

- 1.19 Planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan in this instance comprises the following:
- (1) St Albans City and District Local Plan adopted in 1994;
 - (2) The Sandridge Neighbourhood Plan which relates to part of the application site only; and
 - (3) The Hertfordshire Waste and Minerals Local Plans.
- 1.20 The application site is within the Green Belt as delineated in the 1994 Local Plan. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The proposed

development would, for the most part, represent inappropriate development in the Green Belt. Whilst this is a strong policy presumption against development, inappropriate development is permissible where very special circumstances exist. For the reasons given herein, this is an instance where planning permission can and should be granted.

Benefits of the proposed development

- 1.21 The proposed development will achieve the following notable and important benefits:
- (1) Development in accordance with the District's established spatial pattern which focuses new housing at St Albans as the pre-eminent settlement.
 - (2) An amount of new housing that will make a material contribution to meeting the identified need for new housing in the short term and provide surety of supply in the longer term.
 - (3) The proposed development will provide a wide-ranging housing offer; market housing, affordable housing, specialist accommodation for the elderly, adult disability service units and self and custom build.
 - (4) New neighbourhood facilities to support community cohesion.
 - (5) Investment in local sporting facilities.
 - (6) A comprehensive green infrastructure strategy that achieves an on-site net gain in biodiversity of more than 10% and provides an attractive living environment.
 - (7) A well-located development that can capitalise on existing sustainable travel corridors, with investment in active travel to key destinations.
 - (8) Implementation of Public Right of Way Improvements.
 - (9) A net-zero carbon energy strategy, where achievable on-site.
 - (10) Governance and stewardship arrangement.
 - (11) Economic Benefits in the form of employment for local people and expenditure in the local economy.
 - (12) The interface with Sewell Park to ensure integrated and coherent development.

Planning Application Documents

- 1.22 The planning application comprises a suite of plans, drawings and documents which are listed in *Appendix 2*. Certain of these plans and drawings would be formally approved as part of the planning permission, whilst others are for illustrative purposes only. Documents which comprise principles that are intended to guide the detailed design and implementation of the proposed development would be the basis of planning conditions or planning obligations.

Planning Statement

- 1.23 In terms of format, this document is structured as follows:

Section 2 describes the application site;

Section 3 provides an explanation of the proposed development;

Section 4 discusses the relevant development plan policies, both those aspects with which the development accords and those aspects with which there is a conflict;

Section 5 discusses the emerging Local Plan which has reached Regulation 19 stage;

Section 6 considers relevant aspects of the National Planning Policy Framework;

Section 7 considers other relevant material considerations, including the housing plan supply position in the District which is highly germane;

Section 8 provides an overarching planning assessment;

Section 9 considers in particular very special circumstances as they exist in this instance; and

Section 10 provides conclusions in the form of a planning balance exercise to support why planning permission should be granted.

2 The application site

2.1 This section provides a description of the application site.

The site

- 2.2 The site, measuring some circa 50.30 hectares, predominantly comprises arable land in agricultural use. It is sub-divided into five parcels of varying sizes. Specifically, the site is made up of four agricultural land parcels which are defined by hedgerows and tree belts, as well as three playing pitches measuring circa 3 hectares that form part of the existing Woollam Playing Fields and are leased to the Old Albanian Sport Association (OASA).
- 2.3 Longcroft, the field to the east of Woollam Playing fields, measures some 10 hectares in size, but only half of this is included within the application site.
- 2.4 Sandridgebury Lane bisects the site, extending from the south-western corner towards the north-eastern portion of the site. Valley Road connects Sandridgebury Lane with the wider St Albans area to the south, extending into a small area of the southern part of the site.
- 2.5 Longspring Wood extends from Valley Road along the southern boundary of the site. It is an area of ancient woodland and is identified as a Local Wildlife Site. A Public Right of Way (Route 096) extends from Valley Road, through the wood, before extending north through the site towards Sandridgebury Lane.

Location

- 2.6 The site is contained by the A1081 (Harpenden Road) to the west, the Midland Main Line railway line to the east, and Longspring Wood to the south. It is surrounded by a mix of land uses, typical of its edge of settlement location. More specifically, it is bounded:
- (1) to the north by agricultural land and additional pitches associated with Woollam Playing Fields.
 - (2) to the east by the Midland Main Line railway line, beyond which lies open countryside.
 - (3) to the south-east by Valley Road Industrial Estate, with the wider St Albans settlement beyond.
 - (4) to the south-west by St Albans Girls' School and a recently constructed Artificial Grass Pitch (AGP), and residential land uses beyond.
 - (5) to the west by the 4.5 hectare parcel of land Sewell Park - which benefits from outline planning permission for up to 150 dwellings and associated works (Ref: 5/2021/0423).

Site characteristics

Heritage

- 2.7 The site does not contain, nor do its boundaries comprise, any listed building or designated heritage assets.
- 2.8 Two scheduled monuments are located within the vicinity. In closest proximity, a scheduled monument exists approximately 450m south of the site; this comprises an Iron Age territorial boundary known as Beech Bottom Dyke. It is visually and physically separated from the site by Longspring Wood, Valley Road industrial estate, and residential uses. but improvements to the Ancient Britton junction could impact on it. Those works could require scheduled monument consent which is a procedure outside of the Town and Country Planning regime.
- 2.9 A single Grade II* and a number of Grade II listed buildings exist within a 2km radius of the site. The application site does not contribute to the setting of any of these assets. Two listed buildings are located approximately 800m north-west of the site. These comprise Childwick Lodge and the associated entrance gates, railings and piers, both of which are Grade II listed. These features are also disconnected from the site, both physically and visually, by the existing tree belt which follows Harpenden Road, and the wider agricultural land.

Ecology

- 2.10 The site comprises four arable field parcels under agricultural cultivation and one amenity grassland parcel. Within the site, the field parcels are generally bounded by hedgerows, with the exception of the south-eastern boundary that is bounded by Longspring Wood, and the eastern boundary which comprises the railway line and its associated embankment. Existing planting provides the northern boundary to the area that will form the residential part of the development. The relocated playing pitches will benefit from new fencing and planting to provide a strong visual shield.
- 2.11 A comprehensive suite of protected species surveys has been conducted on site since 2017. The application site provides habitats suitable for badgers, bats, reptiles, dormouse, breeding birds and wintering birds.
- 2.12 The Chiltern Beechwood Special Area of Conservation (SAC), at its closest point, is approximately 14.5km to the west. The application site therefore falls beyond the “zone of influence” for this designation.
- 2.13 There are nine local non-statutory wildlife sites within 1km of the site, the nearest of which is Longspring Wood Local Wildlife Site.

Landscape features

- 2.14 The site comprises a series of gently undulating fields, broadly sloping from west to east and bisected by Sandridgebury Lane. It forms part of a network of dry valleys, east of the A1081, spanning between Harpenden and Wheathampstead to the north and Sandridge and St. Albans to the east and south. Field boundaries throughout the site are typically intact and well managed. Longspring Wood extends along its southern boundary.
- 2.15 The main residential part of the site is enclosed by landform and vegetation to its north and south and bounded by development land and the A1081 to its west and the railway line to its east. A public footpath (St Albans City 096) extends southward from Sandridgebury Lane along the eastern boundary of the site and within the ancient woodland along the southern boundary.
- 2.16 Views across the site are clear, owing to the folding topography, but are limited to some boundaries by neighbouring landscape and vegetation. To the west, planting associated with residential properties aligning with Harpenden Road restrict views into and out of the site, as does structural planting defining the sports fields to the north-west. The belt of woodland to the south screens the commercial and industrial uses beyond, and St Albans Girls School limits views to the south-west. Mid-distance and distant views are possible from within the site to open countryside to the north and east, above and beyond field boundaries and the embankment of the railway line which bounds the east of the site. Isolated properties are visible at distance.

Flood risk

- 2.17 The site generally falls from north and south towards a central localised depression on the eastern edge adjacent to the railway. The highest elevation within the site is approximately 122mAOD and is situated to the north east of the site, with the lowest elevation being approximately 102.7mAOD, situated to the south east. The Site is underlain with a Bedrock geology of Kesgrave Catchment Subgroup – Sand and Gravel, with two types of superficial deposits. To the north, centre and south of the site, areas of Lewes Nodular Chalk Formation and Seaford Chalk Formation (Undifferentiated) – Chalk are situated. To the north and west of the site is a superficial geology of Clay with Flints Formation – Clay, Silt, Sand and Gravel.
- 2.18 In accordance with the publicly available Flood Map for Planning, the Site is identified to be located entirely within Flood Zone 1, which means it is outside of the maximum flood extents of nearby Main Rivers in the 1 in 100 year and 1 in 1,000 year flood events.
- 2.19 From review of the Long Term Flood Risk Information, Flood Risk from Surface Water Mapping, the Site is predominantly identified to be at very low risk of surface water flooding. Two overland flow routes are identified within this mapping, one flowing from north west to the east, identified to be at low to medium surface water flood risk and one flowing from south west to east, identified to be low to high surface water flood risk. This mapping identified localised areas to be at high risk of

surface water flooding, most notably to the east within the localised depression adjacent to the railway. As the *Flood Risk Assessment* describes, this mapping has been produced at a national scale to provide the first publicly available generation of surface water flood risk mapping. Although this incorporates local estimates of the sewer and infiltration loss, it does not allow for local geology or hydraulic constraints/improvements to the underlying Digital Terrain Model (DTM). This may mean that local geology like chalk and the associated infiltration capacity could be under-represented.

- 2.20 As shown on the existing Thames Water asset mapping, a 225mm diameter combined sewer bisects the site within the north western parcel before flowing south along Harpenden Road, with a further existing, public 300mm diameter surface water sewer situated in Harpenden Road.

Accessibility

- 2.21 Harpenden Road, to the west of the site, is a key road within the area. It is a single carriageway which connects the site with St Albans city centre, and serves bus route 321, a primary inter-settlement route which operates between Luton and Watford via St Albans and Harpenden.
- 2.22 The Local Cycling and Walking Infrastructure Plan (LCWIP), prepared jointly by Hertfordshire County Council and the District Council, also proposes that Harpenden Road will accommodate a series of walking and cycling route interventions to improve active travel to key destinations.
- 2.23 Valley Road Industrial Estate, also known as Porters Wood Industrial Estate, is located to the immediate south of Longspring Wood. It predominantly provides a mix of industrial, employment and commercial uses, albeit a small portion of residential use is present at its north-eastern corner.
- 2.24 The site benefits from good access to education provision. St Albans Girls' School is located to the south-west. This includes the recently constructed AGP, gymnastics club, tennis and netball courts, and sports hall. In New Greens, the nearby Townsend Church of England School, accommodates Key Stages 3 and 4, and sixth form, and Sandringham School (within 3.5km of the site) also accommodates the same age groups. Three primary schools also exist within 3km of the site, including Margaret Wix Primary School, Bernards Heath Junior School, and Wheatfields Junior School.
- 2.25 New Greens provides a number of small-scale retail and commercial and community facilities. Opportunities for recreation and leisure exist in proximity to the site; Public Right of Way route 096 extends through the site towards Sandridgebury Lane, and The Woodland Trust's Heartwood Forest is located to the north-east of Sandridge. Woollam Playing Fields accommodate various local club activities, and Toulmin Drive sports pitches in New Greens provide more informal recreation grounds.

Sewell Park

- 2.26 Land adjacent to the application site benefits from outline planning permission for up to 150 new dwellings and associated works (Ref: 5/2021/0423). It measures approximately 4.5ha in size and is broadly rectangular in shape and comprises land to the rear of existing dwellings on Harpenden Road. A reserved matters application has recently been submitted by the prospective developer, Cala Homes.
- 2.27 A number of pedestrian and cycle links between Sewell Park and the application site are intended to be provided as part of that planning permission; these were identified as part of the wider North St Albans Broad Location in order to provide permeability between both parcels of land.

3 Engagement

- 3.1 The development potential at North St Albans has been identified for some 10 years. The applicant has held discussions with the LPA in respect of this since 2018, first in the context of the emerging Local Plan, and secondly the masterplan process for this Broad Location.
- 3.2 In 2020, the applicant and the District Council together prepared a masterplan for North St Albans. This reflected the intent of the Local Plan at that time for each Broad Location to be guided by such a document consistent with its strategic sites masterplanning and design guides. As part of that process, stakeholder and public engagement was conducted by consultants on behalf of the District Council.
- 3.3 That exercise established key principles: (1) the location and form of access onto Harpenden Road; (2) the relocation of playing fields to Longcroft; (3) the role of Sandridgebury Lane in anchoring the central area of green space and its use as an active travel corridor; and (4) the broad location of the local centre and primary school.
- 3.4 It is understood that the North St Albans masterplan was the only such document presented to what was then the Local Plan Advisory Group in July 2020.
- 3.5 More recently, once the LPA had re-started its Local Plan process in 2023 and North St Albans was again identified as a proposed Broad Location, the applicant entered into pre-application discussions with both the District and County Councils. As appropriate, these discussions have included other stakeholders, such as the Local Lead Flood Authority, Sport England, and the Integrated Care Board.
- 3.6 Such discussions have covered the following matters: masterplanning and design, landscape, ecology, archaeology, drainage, transportation, education, affordable housing, adult care services and healthcare. This body of work has led to further material alterations to the masterplan and the components of the proposed development. In brief, a great deal of common ground has been reached through that process.
- 3.7 In parallel, the applicant has also conducted a programme of community and stakeholder engagement as explained in the *Statement of Community Involvement*. Public exhibitions were held in September 2024, whilst information was also hosted online and drop-in sessions were arranged. It was striking that many of the people who attended the public exhibition recognised the importance of new housing being provided at St Albans; those who were opposed to the development were largely concerned with its effects, largely in relation to traffic conditions on the local highway and infrastructure.
- 3.8 Meetings have also been held with local organisations and parish councils to explain and explore the development proposals, which has led to a number of significant adjustments.
- 3.9 The above illustrates how the submitted application is founded on longstanding collaborative working with the District Council and County Council, engagement with stakeholders, and an open approach to consulting the local community.

4 The proposed development

4.1 This section provides a description of the proposed development.

4.2 Planning permission is sought for the following proposed development:

- (1) *Relocation and replacement of existing playing fields and erection of pavilion annex; and*
- (2) *Construction of up to 1000 new homes (Use Class C3) to include a mix of market housing, affordable housing, age restricted specialist accommodation for the elderly, adult disability service units; a care home (Use Class C2); a local centre (Use Classes E and F); a primary school (Use Class F); the laying out of green infrastructure including habitat creation; drainage infrastructure; earthworks; pedestrian and cycle routes; new means of access and alterations to existing accesses.*

4.3 The submission comprises a “hybrid” planning application, whereby the majority of the application is submitted in “outline” with all matters reserved for future consideration, and the remaining elements are submitted in “full” detail. The form of the planning application is explained in the Scheme Specification and Parameters Document submitted as part of the planning application.

Land use components

4.4 The proposed development comprises the following components:

- (1) up to 1000 new homes (C3) of which 40% shall be affordable housing and 3% self and custom build and shall include four adult disability service units and up to 80 apartments for age restricted specialist accommodation for the elderly;
- (2) 80 bed care home (C2);
- (3) a local centre providing retail, employment and community facilities, healthcare, and a mobility hub;
- (4) a two-form entry primary school;
- (5) new areas of accessible greenspace including a linear park providing areas of amenity open space, children’s playspace, habitat creation, sustainable drainage, and community growing space and/or allotments;
- (6) the relocation of an area of playing fields to Longcroft and the construction of a two-changing room sports pavilion annex;
- (7) formalisation of the existing over-spill car park for temporary and occasional use of Woollam Playing Fields;
- (8) a new all-modes access constructed onto Harpenden Road and the introduction of modal filters on Sandridgebury Lane and Valley Road;
- (9) internal roads, cycleways, footways and drainage infrastructure; and
- (10) the creation of a new footway and cycleway extending from Sandridgebury Lane to the Hertfordshire Way.

4.5 The arrangement of these land uses across the application site are shown on the parameter plans and illustrative masterplan.

Parameter plans

4.6 The parameter plans listed at Table 1 and included at *Appendix 3* are the controlling plans (along with the red line site boundary) that will be formally approved with the grant of planning permission. They inform the EIA that has been undertaken for the proposals and reported in the ES.

Table 1 Parameter plans

TITLE	DRAWING	INFORMATION PROVIDED
Land use parameter plan	DE_565_072 Rev D	The broad arrangement of land uses within the site
Access and movement plan	DE_565_073 Rev D	The internal access arrangements and points of connection to the site
Green and blue infrastructure parameter plan	DE_565_074 Rev D	The broad arrangement for blue and green infrastructure within the site
Building heights plan	DE_565_075 Rev D	The maximum height of buildings within development area

4.7 These illustrate in diagrammatic form the disposition of land uses proposed across the application site as follows:

- (1) the spatial distribution of proposed uses;
- (2) the location and type of various points of access and the primary movement corridor; and
- (3) the areas of green infrastructure to be retained or created.

4.8 Pursuant to the grant of outline planning permission, reserved matters approvals for scale, appearance, layout and landscape will be required for those parts of the development where these details have not been reserved.

4.9 The parameter plans are to be approved drawings in the event planning permission is granted and a later stage Reserved Matters application will be required to accord with them.

Illustrative framework plan

4.10 An illustrative framework plan is submitted with the outline application (ref: DE_565_105 Rev B). It is founded upon the Parameters Plans referred to above but remains illustrative and will not be an approved plan.

4.11 The *Design and Access Statement* explains the design approach associated with the disposition and arrangement of land uses. It shows the character areas proposed, their spatial typologies, movement hierarchy and the nature of different aspects of green infrastructure.

Playing fields

4.12 An area of land measuring circa 5 hectares within the application site comprises existing playing fields that are part of Woollam Playing Fields and leased to the Old Albanian Sports Association. These are laid out as three rugby pitches over which a cricket pitch is laid.

4.13 The same configuration of playing pitches is to be relocated to Longcroft as shown on the drawings listed in Table 2 and included at *Appendix 3*. These will fully replace those to be developed. A new sports pavilion annex required by England and Wales Cricket Board will also be provided, along with an artificial cricket wicket (non-turf) as an extension to the replaced grass wickets.

Table 2 Playing Field Drawings

TITLE	DRAWING
Sports Pavillion Annex	De_565_012 rev C
Proposed Floor & Roof Plan	DE_565_013 Rev B
Existing Context Plan	DE_565_78 Rev C
Proposed Context Plan	DE_565_79 Rev C

TITLE	DRAWING
Existing Site Plan	DE_565_80 Rev C
Site Layout Plan	DE_565_81 Rev D
Proposed Fencing / Enclosure Plan	DE_565_82 Rev C
Advanced Planting Specification	DE_565_103 Rev A

4.14 These will be approved plans. This enables the playing fields' works to be undertaken as the first element of the development, which will allow OASA to relocate with uninterrupted use, prior to vacant possession of the current pitches.

4.15 To form the new playing fields, the following works are required:

- (1) A plateau will be formed through engineering works and planted to create suitable playing surfaces. The specification associated with this is set out in the TGMS Report.
- (2) A means of enclosure shall be erected around the playing field area incorporated into which will be landscaping and habitat creation.
- (3) New drainage infrastructure shall also be formed included an attenuation basin that discharges to a ground and is separate from the site-wide drainage scheme.
- (4) A two-team changing room sports pavilion annex will also be constructed to meet the requirements of the England and Welsh Cricket Board
- (5) An area of hardstanding to accommodate (153 parking spaces) and drainage infrastructure.
- (6) Subject to the need identified in the ball-strike report, ball-strike netting shall be erected seasonally, albeit the posts to which the nets are fastened will remain in place.

Housing

4.16 The principal component of the proposed development is new housing. The Land Use Parameter Plan identifies approximately 18.25ha of developable land for housing (excluding the local centre). This area would provide some 800 new homes at an average density of 44 dwellings per hectare. In addition to this, within the local centre, there will be up to some 200 additional dwellings in form of apartments, townhouses, adult care self-contained disability support units, and age restricted specialist accommodation for the elderly (80 no. apartments). A care home (C2) (80 no. bedrooms) is also proposed.

4.17 The Building Height Parameter Plan illustrates that the new housing will range between two and four storeys in height. In broad terms, building heights and density, will be greatest in the local centre tapering to the lowest density at the application site's north-eastern corner.

4.18 As this application is in outline form, specific detail on mix and sizes of dwellings will follow at detailed stage, but it is intended that reserved matters applications would reflect relevant considerations at that time. Having regard to the housing mix set out in draft Policy HOU1, the mix would likely comprise:

- (1) Market housing - predominantly 2, 3 and 4+ bedroom homes with a small proportion of 1 bedroom properties
- (2) Affordable home ownership - predominantly 1, 2 and 3 bedroom properties
- (3) Affordable housing (rented) - predominantly 1, 2 and 3 bedroom properties with a small proportion of 4+ bedroom homes.

Local centre

4.19 Community facilities will be provided as part of the proposed development along with a new two-form entry primary school. A new mixed-use local centre will comprise retail, office, community

facility, a healthcare facility, age restricted specialist housing for the elderly, adult disability service units, and market and affordable housing. A mobility hub and electric vehicle (EV) charging will also be provided. The arrangements of the local centre buildings and spaces are shown on the *Illustrative Framework Plan* and optimise public realm and servicing requirements.

Primary school

- 4.20 A new two-form entry primary school is proposed, the location of which is shown in the *Land Use parameter plan*. This measures 2 hectares in size and is situated near the local centre, thus contributing to the critical mass of uses and at the confluence of east-west and north-south movement corridors. The applicants intend that the primary school is subject to a community use agreement enabling greater utilisation of its premises and facilities; this will be a matter for the Local Education Authority (LEA) to determining in due course. The applicants intend to transfer the land to the LEA at an appropriate time in the project.

Green and blue infrastructure

- 4.21 The *Green and Blue Infrastructure parameter plan* identifies where existing vegetation is to be retained and where new landscape and habitat creation is proposed. The indicative *Landscape Framework Plan* (drawing: DE_565_102 Rev B) depicts how these various areas will be used and planted accordingly. This is the basis of the biodiversity net-gain calculation that has been undertaken and which records that a greater than 10% gain is achieved on-site.
- 4.22 A buffer to Longspring Wood is shown on the land use plan, consistent with standing advice relating to ancient woodlands. The *Landscape Framework Plan* intends that the buffer zone is planted with semi-natural habitats.
- 4.23 In accordance with established policy the proposed development will implement sustainable drainage systems (SuDS) to positively manage surface water throughout the development.
- 4.24 The drainage scheme will capture, convey, treat and manage surface water, principally by means of above-ground nature-based solutions. The surface water will be conveyed to an infiltration basin located in the easternmost part of the area of open space. The proposed SuDS train provides multi-functional spaces that will integrate with the existing landscape to enhance biodiversity and create complementary habitats. The SuDS will also help improve water quality before being discharged to the ground.

Access and movement

- 4.25 Proposed access drawings are listed in Table 3 and are included at *Appendix 5*.

Table 3 Proposed Access Drawings

TITLE	DRAWING
Harpenden Road signalised site access	05920-CI-A-001 P04
Sandridgebury Lane arrangement	05920-SK-008 P1
Sandridgebury Lane turning loop	05920-SK-006 P2
Valley Road	05920-SK-010 P2

- 4.26 A new junction is to be formed on to Harpenden Road as shown on drawing 05920-CI-A-001 P04. The principle of this was agreed by Hertfordshire County Council Strategic Transport Infrastructure Board in 2020. This will comprise a traffic signal-controlled T-junction with the proposed site access forming the minor arm.
- 4.27 The site access proposals incorporate protected active travel infrastructure along the site access arm and along Harpenden Road to the south connecting to the committed facilities being delivered as part of the off-site mitigation by the adjacent Sewell Park. To the north of the proposed junction, active travel infrastructure will be provided to the existing Old Albanians Sports Ground access. The proposals will allow for the future delivery of high-quality active travel infrastructure along National

Cycle Route 6 to Harpenden as proposed within the LCWIP. Traffic signal-controlled active travel crossings of Harpenden Road and the site access will be incorporated within the traffic signal control at the junction.

- 4.28 To deliver the junction it is proposed that the existing 30mph speed limit along Harpenden Road is extended approximately 400m north to encompass the new site access junction and the access to the Old Albanian's Sports Ground. Within the site it is proposed that all roads are subject to a 20mph speed limit.
- 4.29 To enhance public transport accessibility, it is proposed that the existing stops to the north and south of the site access are consolidated into a single pair of bus stops close to the site access junction. These will incorporate bus shelters and raised boarding platforms and will replace the existing poles. The primary road enables a bus route to be formed between Harpenden Road and the local centre. This will facilitate the potential extension of service 653 (Tigermoth) into the development.
- 4.30 A network of footways, cycleways and roads will be provided within the development. The *Land Use parameter plan* depicts the primary access road which will comprise carriageway and segregated footways and cycleways compliant with LTN1/20. The alignment of routes within the individual development parcels will be determined at the reserved matters stage pursuant to "layout", whilst the *Transport Assessment* provides a description of the intended street hierarchy.
- 4.31 Sandridgebury Lane extends through the application site connecting Harpenden Road and Sandridge. It is proposed that, within the application site, a new route is provided between Harpenden Road and Sandridgebury Lane. The main section of Sandridgebury Lane within the site would then be converted into use as a green lane and limited to walking and cycling only. Vehicular access along the central part of Sandridgebury Lane would be restricted by the introduction of a modal filter, with provisions to monitoring future traffic levels against which further management measures could be introduced. A modal filter is also proposed at Valley Road to limit its use to pedestrian and cyclists. These principles, shown on drawings 05920-SK-008-P1, 05920-SK-006-P2 and 05920-SK-010-P2 have been discussed and agreed with Hertfordshire County Council.
- 4.32 A new footpath and cycleway is proposed to extend from Sandridgebury Lane (St Albans City 096) to the Hertfordshire Way (Sandridge 009). This would be a recreational route to provide access to the countryside footpath network to the north the application site and Heartwood Forest. This has been discussed and agreed with members of the Hertfordshire County Council's Access Forum.

Carbon net zero

- 4.33 North St Albans will be designed, delivered and operated to fully support the transition to a net zero economy. All buildings on site will be designed with high levels of energy efficiency and generate a significant amount of their heat and power from renewable energy technologies, to achieve net-zero for regulated emissions.
- 4.34 Future residents of North St Albans will be provided with the infrastructure and technology to live a net zero lifestyle, enabling walking and cycling to school and key services and facilities within St Albans. All homes will be provided with access to electric vehicle charging infrastructure and their homes will be 'smart energy' enabled to allow residents to generate and use power at optimum times during the day to minimise energy costs and carbon emissions.

Infrastructure

- 4.35 Infrastructure that is common place with large-scale mixed use development is also to be provided. This will include the installation of below ground foul water sewers and services, surface water drainage as described above, and footways and cycleways and roads. A foul water pumping station may also be required.

5 The development plan

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires a planning application to be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance, the development plan comprises the following:
- (1) The St Albans City and District Local Plan adopted in 1994;
 - (2) The Sandridge Neighbourhood Plan made in 2021 and which relates to part of the application site; and
 - (3) The Hertfordshire Waste and Minerals Local Plans.

5.2 The following paragraphs identify and discuss relevant development plan policies, the weight that they should attract, and comments on the extent to which the proposed development accords or otherwise with them.

5.3 Weight should be determined in the context of paragraph 225 of the National Planning Policy Framework; existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

The St Albans City and District Local Plan

- 5.4 The St Albans City and District Local Plan was adopted in July 1994 and had an end date of 2001. It was prepared in the context of the then Hertfordshire Structure Plan and national planning policy as existed at that time. It is time expired and not “up to date”, although its policies continue to attract weight.
- 5.5 Because of its exceptionally aged nature, the Local Plan does not identify land to meet current and future development needs. As such, the fact the application site is not an identified site for development therein is of limited weight.
- 5.6 The two policies which are of a strategic nature are Policies 1 and 2, which concern the Metropolitan Green Belt and the Settlement Strategy.

Green Belt

- 5.7 **Policy 1** affords land within the Green Belt protection against inappropriate development. The terms of this policy and the level of protection it affords to this designation is consistent with the NPPF.
- 5.8 It is instructive however that the Green Belt’s boundaries were determined by the development needs that existed in the 1980s. The Green Belt has endured without alteration since that time and it now represents a designation that tightly contains all of the District’s settlements. The self-evident consequence of this is that the District’s present and future development needs cannot be met without developing occurring in the Green Belt. Reflecting this, several planning applications have been approved for development within the Green Belt where very special circumstances have been proven to exist.
- 5.9 The proposed development would, for the most part, represent inappropriate development, although as a matter of principle such development is permissible where very special circumstances are proven. Despite the policy protection that is afforded to the Green Belt by Policy 1, in the event very special circumstances are proven to exist, granting planning permission would accord with the development plan. The considerations that represent very special circumstances are discussed in Section 9.
- 5.10 The proposed playing fields represent appropriate development in the Green Belt by reference to Policy 1 criterion c: small scale facilities for participatory sport and recreation; and Policy 91(b) and Policy 96 which concern medium intensity leisure facilities that includes *inter alia* sports pitches

requiring large areas of open land and few buildings. This is consistent with paragraph 154(b) of the NPPF.

Spatial strategy

- 5.11 **Policy 2** identifies the Plan's settlement strategy and identifies St Albans City as the settlement at the pinnacle of that hierarchy. The location of the proposed development is consistent as a matter of principle with the intended spatial distribution; new development should be generally concentrated in the identified towns. Where development needs can no longer be met within the defined limits of this main settlement, the principle of urban expansion as a means to achieve the desired concentration is wholly appropriate. Whilst the policy seeks to protect the character of settlements, because of the contained nature of the application site, the proposed development cannot be said to cause unacceptable harm to important townscape attributes or landscape setting characteristics.
- 5.12 Other policies are related more to development management and are discussed below.

Affordable housing

- 5.13 **Policy 7A** concerns affordable housing in town and specified settlements and intends that a proportion of affordable homes are provided on new housing development. This is framed by the level of identifiable housing need in the District. When contrasted with current evidence provided in the 2020 Strategic Housing Market Assessment and the 2024 Local Housing Needs Assessment, the scale of need is substantially higher. Whilst Policy 7 does not specify a proportion, the applicant intends that 40% of the new housing is affordable housing which, in the context of both need for and supply of affordable housing, would represent a substantial benefit and would accord with this policy approach. The proposed development therefore accords with this policy.

Highway considerations

- 5.14 **Policies 34 and 35** concern highway considerations in development control and highway improvements associated with new development. The former requires that development is acceptable in terms of road safety, environmental impact of traffic, road capacity relative to road hierarchy and car parking provision. The latter requires highway mitigation measures where new development proposals would otherwise result in detrimental highway conditions. Whilst these remain important policy areas, highway effects should be judged by reference to the NPPF (paragraph 115) and mitigation measures should be determined in the context of the emphasis on active and sustainable modes of travel rather than highway capacity. Any conflict perceived with this policy would attract limited weight.

Parking Standards

- 5.15 **Policies 39 and 40** concern parking standards. These reflect a different period and do not account for the emphasis on reducing car usage by prioritising alternative modes of travel. At the present time, strict adherence to such aged parking standards would not be appropriate. Again, any conflict perceived with this policy would attract limited weight.

Retail

- 5.16 **Policy 52** concerns shopping development and intends that new retail space is directed to designated locations or policy areas. Beyond those areas, retail development will normally be resisted (criterion c refers). New local centres to serve new residential development were identified however (para 6.21 refers). The small-scale retail use as part of the local centre proposed as part of the scheme is analogous with this approach. Policy 58 requires retail impact assessments for major retail development outside existing town centres; this is explained as retail warehouses, large supermarkets, superstores, hypermarkets or major out-of town centres; none of these types of uses are proposed.

Education facilities

- 5.17 **Policy 65** judges proposals for new schools against several criteria that relate to safeguarding amenity and environmental considerations. The location of the proposed primary school would not give rise to such adverse impacts and the detailed detail stage would ensure that relevant

considerations are appropriately addressed. Its location is a key part of the community infrastructure proposed and internal routes have been arranged to reflect this. The proposed development accords with this policy.

Design and layout

- 5.18 **Policy 69** concerns general design and layout, requiring all development to have an adequately high standard of design taking into account context, materials and other policies. **Policy 70** requires the design and layout of new housing to have regard to its setting and the character of its surroundings whilst meeting various design objectives.
- 5.19 Whilst in many respects these are matters germane to the consideration of detailed planning applications or reserved matters where landscaping, layout, appearance, and scale are to be determined, the proposed development is aligned with the good design objectives underlying these policies.
- 5.20 The *Design and Access Statement* adopts the design characteristics in the National Design Guide and establishes structuring elements and a framework to ensure later stages of the design process achieve high-quality design. The foundational elements of the land use and green and blue infrastructure plans draw on the 2020 masterplan document which the applicants and the District Council prepared together collaboratively. However, a greater emphasis has now been placed on green infrastructure considerations which has resulted in an adjustment to the extent of built footprint and has increased useable open space.
- 5.21 The parameter plans align with the development proposals illustrated for Sewell Park to ensure appropriate connections are made that ensure permeability for the future residents of both developments.
- 5.22 The *Design and Access Statement* establishes various design principles that will inform a Design Code to be prepared pursuant to a planning condition. The Design Code will in turn guide the subsequent reserved matters applications. This design cascade ensure that the importance afforded to high quality design is achieved through later stages of the planning process.

Landscape

- 5.23 **Policy 74** lists landscape factors that will be taken account of in determining planning applications and protects existing important features; trees, hedgerows, ponds and watercourses. The *Green and Blue Infrastructure parameter plan* identifies landscape features that will be retained. Where landscape features are to be removed, the compensation strategy will deliver an overall betterment and an increase in landscaping across the site. The *Landscape Framework Plan* depicts landscaping and habitat measures that will guide more detailed design later in the planning process. The proposed development accords with this policy.

Flooding and river catchment management

- 5.24 **Policies 84 and 84A** concern the water environment and new development, including flood risk. The application site is at low risk of fluvial flooding. However, there surface water flow paths cross parts of the site reflecting its topography, the present agricultural regime and the absence of any positive drainage. A sustainable urban drainage strategy is proposed that will accord with current policies and best practice. This will ensure that surface water is appropriately managed without new development being at risk of surface water flooding, including from potential run-off from adjoining land, and that there is no increase in flood risk elsewhere. The proposed development accords with these policies.

New areas of public open space

- 5.25 **Policy 94** is not a saved policy but required that public open space is provided in accordance with **Policy 70** criterion (xi). This lists standards for different types of playspace. The amount of open space provided by the development is considerably in excess of the overall total that these standards would imply. The scheme does not include football pitches and rather a financial contribution is proposed to improve the utility of existing playing fields and facilities at Toulmin Drive Recreation Ground. This approach responds to the identified need to improve those facilities because of their condition. The scope of providing a playing field as part of the proposed

development would be at odds with the scheme's emphasis on natural greenspace. Moreover, the provision of a single playing pitch with the associated infrastructure would not represent an efficient use of land, especially where there is an alternative opportunity available in close proximity to the site.

Leisure uses in the Green Belt

- 5.26 **Policies 91 and 96** are associated with Medium Intensity Leisure Uses in the Green Belt. Type B uses are permissible within the Green Belt; these comprise “uses requiring large areas of open land with few buildings, but intermittent or continuous use by relatively large numbers of people” and include for example “sports pitches”. The proposed development accords with this policy. This approach is similar to that at paragraph 154 of the NPPF where playing fields are referenced as an appropriate form of development in the Green Belt.

Footpath, bridleways and Cycleways

- 5.27 **Policy 97** protects footpaths, bridleways and cycleways. The Definitive Footpath Map records Footpath 69 extending between Valley Road, through Longspring Wood and along the toe of the railway embankment to Sandridgebury Lane. This route is retained and incorporated into the proposed development. The proposed development accords with this policy.
- 5.28 The applicants intend to provide an additional footpath and cycleway northwards to form a connection between Footpath 69 and the Hertfordshire Way. This would deliver one of the routes referred to in the Sandridge Neighbourhood Plan, which is derived from the County Council's Rights of Way Improvement Plan (2017). This would be a benefit of the proposed development.

Agricultural land

- 5.29 **Policy 102** concerns agricultural land and seeks to protect land of that is classified as Best and Most Versatile. A similar approach to protect higher quality agricultural land is set out in the NPPF (paragraph 181 and footnote 62).
- 5.30 The application site comprises land of various qualities, the highest of which is subgrade 3a (good quality) and which extends across 64% of the site area (31.7 hectares). The proposed development would conflict with Policy 102 unless an overriding need exists and there is no alternative land of a lower quality which could reasonably be used.
- 5.31 The identified need for additional development land to meet present and future development need beyond the existing urban areas represents an overriding need. Moreover, the *Agricultural Land Classification and Soils Resources Report* illustrates the extent to which land across the District comprises grade 3 with some areas of grade 2. These two circumstances militate against the conflict with Policy 102.

Nature conservation

- 5.32 **Policy 106** concerns nature conservation. **Policy Intention 28** indicates that the Council encourages the creation of wildlife habitats. Planning permission will not normally be granted where the proposed development could adversely affect sites that have nature conservation importance. The accompanying *ecological impact assessment* describes the value of the application site and identifies important ecological features. The presence of these ecological features does not represent a reason to refuse planning permission. They are appropriately protected as part of the green infrastructure strategy and the biodiversity net gain metric returns a positive score that exceeds the minimum requirement in the 2021 Environment Act. An Ecological Mitigation Management Plan can be secured by planning condition that will specify necessary measures to be implemented as part of the development at the detailed design stage. The proposed development accords with this policy.

Implementation

- 5.33 **Policy 143B** concerns implementation and requires new development to provide for infrastructure either (i) in the form of on-site facilities directly related to the proposed use in the interests of comprehensive planning; and (ii) off-site facilities necessary as a result of the development in order to avoid an additional burden on the existing community. The applicants intend that a Section 106

Agreement will be prepared to govern the provision of infrastructure in accordance with the Community Infrastructure Regulations 2010 (Regulation 122) such that the proposed development accords with this Policy. The applicants have prepared *Draft Heads of Terms* for such a planning obligation. Planning conditions can also govern the provision in infrastructure, where appropriate.

The Sandridge Neighbourhood Plan

- 5.34 The Sandridge Neighbourhood Plan was “made” in July 2021. Its policies only apply that part of the application site which is within Sandridge Parish – i.e., the area of land to provide the new playing fields and the new footpath/cycleway to Hertfordshire Way. Figure 1 of the Neighbourhood Plan shown the extent of the Parish’s Boundary and the operational effect of the Neighbourhood Plan’s policies.

Natural environment, biodiversity and green infrastructure

- 5.35 **Policy E1** concerns the natural environment, biodiversity and green infrastructure and seeks positive improvements to such attributes. It also lists mitigation and compensation measures that should be considered. The area of land to house the relocated playing fields is devoid of landscape features other than at its margins. New landscape planting as means of enclosure will contribute positively to restoring hedgerows with associated habitat creation. These aspects of the proposed development would accord with this policy.

Landscape, views and gaps

- 5.36 **Policy E2** intends to conserve the natural landscape, views and gaps within the Parish. The application site is not within an area that has significant views as defined by Figure 13. Similarly, the application site is not within a gap between the Parish’s three neighbourhoods. For these reasons the application site is not significant in terms of the identity and character of the Parish. The proposed playing fields would not have an adverse impact on landscape, fields, views and gaps between the Parish’s settlements.

The Hertfordshire Waste Local Plan

- 5.37 The Waste Development Framework incorporates the Core Strategy and Development Management Policies and a Waste Site Allocations Development Plan Documents. These were adopted in 2012 and 2014 respectively and cover the period to 2026.
- 5.38 **Policy 12** of the former is relevant and requires, where appropriate, new development proposals to address the principles of sustainability by incorporating various elements including construction methods to minimise waste generation and re-use/recycle material as far as practicable; and having good and innovative design with layout principles that allow for the effective sorting, recycling and composting of waste where appropriate. This is a matter that will be judged at the detailed design stage.

The Hertfordshire Minerals Local Plan

- 5.39 The Minerals Local Plan was adopted in March 2007 and covers the period to 2016. Policy 5 concerns minerals sterilisation.
- 5.40 The Minerals Planning Authority’s position in relation to development at North St Albans has been set out in their response to the Local Plan consultation in 2018: *“Comments sent regarding the broad housing allocation at ‘North St Albans’ identified some deposits of sand and gravel beneath the site (according to British Geological Survey Data). In recognition of the fact that minerals would only be extracted and used on-site should they be found during the construction of it”*.
- 5.41 In effect, this is referring to incidental extraction and use of minerals as part of the construction process rather than any prior extraction as a pre-condition of development.

Summary

- 5.42 The above illustrates a high degree of conformity with the development plans’ policies.

- 5.43 Whilst the application site is within the Green Belt, inappropriate development is permissible where very special circumstances exist and if that situation is proven to exist here, as the applicant contends, the conflict with Policy 1 would fall away.
- 5.44 In terms of the spatial strategy, the development reinforces the settlement hierarchy and contributes to the intention that most new development is distributed in accordance with the hierarchy which has St Albans at its pinnacle. The proposed development accords with the spatial intent of Policy 2, noting that it is an out-of-date policy.
- 5.45 In all other respects, it is evident that the proposed development accords with the Local Plan and Neighbourhood Plan's development management policies to the extent that they are relevant to an outline planning application. In particular, the proposed development accords with Policy 7A, Policy 65, Policy 69, Policy 70, Policy 74, Policy 84, Policy 84A, Policy 91, Policy 96, Policy 97, Policy 102, Policy 106, and Policy 143B.
- 5.46 In many respects, the proposed development delivers benefits that contribute positively to the underlying policy objectives, including location that contributes to a sustainable pattern of development, new housing, investment in active travel, new landscaping and habitat creation to achieve a net gain in biodiversity, and public rights of way improvements.
- 5.47 The policies in the Waste Local Plan are most relevant to the construction stage and layout matters. The presence of some minerals resource is not considered to represent a reason to refuse planning permission.

6 National Planning Policy Framework

- 6.1 The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions. In this Section, the extent to which the proposed development accords with the NPPF is explained.

Presumption in favour of sustainable development

- 6.2 Paragraph 8 of the NPPF explains that achieving sustainable development means that the planning system has three overarching objectives – an economic objective, a social objective and an environmental objective.
- 6.3 To ensure that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The presumption in favour is engaged as a matter of principle in this instance for various reasons. The Local Plan does not contain up-to-date policies in respect of present and future development needs. The District Council is unable to demonstrate a five-year supply of housing land required by Government policy. Successive housing delivery tests have fallen below the necessary measurement in Government policy.
- 6.4 Land-use planning principles underpinning both plan-making and decision-taking are embedded within the NPPF by reference to various topics. These principles provide a foundation for the proposals at Woollam Park.

Sustainable development

- 6.5 Woollam Park will be a mixed-use development which will support sustainable economic development through the delivery of new homes, commercial space, community facilities and infrastructure, thereby creating a thriving local place. The proposals seek to secure high quality design, multifunctional greenspace and a good standard of amenity. The scheme provides the opportunity for its residents to use of public transport and promotes active travel by walking and cycling. Important natural environment attributes are suitably protected and complemented by positive measures to improve biodiversity and arrest the loss of habitats. The development takes full account of flood risk and the potential effects of climate change in this regard. SuDS features will be provided within the area of built development and the green infrastructure. The proposed development will also make a significant contribution to the local economy both during the construction period and in the form of increased local expenditure once complete. These benefits align with the three objectives of sustainable development at paragraph 8 of the NPPF.

Delivering a wide choice of high-quality homes

- 6.6 The NPPF emphasises the Government's objective of increasing the supply of new homes at paragraph 60. Woollam Park will deliver a wide choice of high-quality homes, widening opportunities through the provision of market housing, affordable housing and specialist accommodation for the elderly, extra care housing, self and custom build housing. Alongside the provision of local facilities services and green infrastructure, a sustainable and inclusive mixed community will be delivered. There is a well-established need to increase the amount of new housing being built in St Albans and for this reason various planning applications have previously been approved on sites not identified in the adopted Local Plan.

Promoting healthy communities

- 6.7 Paragraph 96 promotes healthy, inclusive and safe places facilitating social interaction and creating inclusive communities.
- 6.8 The proposals will create a safe and accessible development, with clear and legible pedestrian routes and high-quality public space, encouraging the active and continual use of public areas in accordance with paragraph 96. These high quality public open spaces and opportunities for recreation will make an important contribution to the health and well-being of local communities.

- 6.9 The relocation of the existing playing fields ensures that valued facilities continue to be available consistent with paragraph 103.
- 6.10 The local centre and specialist accommodation also contributes positively to the creation of an integrated community. Improvements to Toulmin Drive Recreation Ground will also be possible through the financial contribution to be provided as a planning obligation; this will have the effect of improving what are existing poor grade facilities and increasing the utility of the playing fields and the William Bird pavilion. Active travel measures within and beyond the site, including the new route to the Hertfordshire Way will ensure access to the countryside for recreation.

Promoting sustainable transport

- 6.11 The mixed-used proposals encourage sustainable transport modes through the provision of a bus route, the mobility hub and cycle and pedestrian links, providing people with a choice of travel in accordance with Paragraphs 108, 109, 114 of the NPPF.
- 6.12 As the proposed development is likely to generate a significant amount of movement, the application is supported by a *Transport Assessment* and *Travel Plan*. These illustrate the extent to which positive measures have been taken to capitalise on opportunities for sustainable transport modes.
- 6.13 Reflecting Paragraph 115, with implementation of the off-site improvements and investment in active and sustainable travel, the proposed development will not have an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would not be severe.

Making efficient use of land

- 6.14 The proposed development is at wholly appropriate density striking a balance between the efficient use of land, the ensuing critical mass of population, potential landscape and visual impacts and the consideration of prevailing townscape character and setting, as required by paragraph 128.

Achieving well-designed places

- 6.15 The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design underpins the proposals at Woollam Park and is a “...*key aspect of sustainable development*” (paragraph 131). Paragraph 135 requires planning decisions to ensure that developments:
- (1) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - (2) establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - (3) optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
 - (4) respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - (5) create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
 - (6) are visually attractive as a result of good architecture and appropriate landscaping.
- 6.16 The *Design and Access Statement* sets out the applicant’s aspirations for this new community. Its development strategies provide a framework for ensuring these high standards are maintained through the design process. A Design Code can follow the grant of outline planning permission as is not customary for large scale development.

Protecting the Green Belt

- 6.17 Great importance is afforded to the Green Belt (paragraph 142 refers). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Nonetheless, the emerging

Local Plan recognises that the District's current and future development needs cannot be met unless the Green Belt is amended and that exceptional circumstances exist in this regard as required by paragraph 144.

- 6.18 Inappropriate development, such as the housing element of the proposed development, is by definition, harmful to the Green Belt and substantial weight should be given to this (paragraph 152). Inappropriate development should only be approved where very special circumstances are proven to exist. Paragraph 153 states that *"very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations"*.
- 6.19 Because of the circumstances that are prevalent in the District, planning permission for new housing has been granted in a number of other instances, including the adjacent Sewell Park. The very special circumstances that justify the grant of planning permission in this instance are set out in Section 9.
- 6.20 The proposed playing fields are an appropriate form of development by reference to paragraph 154(b): *"the provision of appropriate facilities (in connection with the existing use of land or a change of use) for... outdoor sport, outdoor recreation... as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it"*. As a matter of principle, built facilities alongside recreation uses are permissible and would only represent inappropriate development where they were unnecessary and thus harmful in definitional terms. The sports pavilion annex is a necessary built facility required by the England and Wales Cricket Board and is the smallest such facility that could be erected. Ball strike netting (or equivalent) will be required to reduce the risk from rugby balls and will be erected on a seasonal basis, with only the posts remaining in place all year. The car park improves existing arrangements, and new cycle parking and disabled parking spaces are provided. These measures do not harm the openness of the Green Belt.

Meeting the challenge of climate change, flooding and coastal change

- 6.21 In respect of planning and flood risk, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere (paragraph 165 refers).
- 6.22 The identification of North St Albans as a Broad Location in the emerging Local Plan has followed Strategic Flood Risk Assessments (Level 1 and Level 2) undertaken on behalf of the LPA. This reflects paragraph 166 – 168 and notably wider sustainable development objectives.
- 6.23 The applicants have also undertaken a sequential test in the context of paragraph 173. This has considered relevant sources of flooding. Whilst the assessment identifies other sites with a lesser extent of flood risk, it is instructive that none of those represent reasonably available sites that would displace the important role of North St Albans in contributing towards the District's housing need and the spatial strategy to achieve this in a sustainable manner.
- 6.24 Those sites that are subject to a lesser extent of flood risk are already identified sites to meet the District's future development needs together with North St Albans. The sequential test has not identified any genuine sequentially preferable sites at or adjacent to St Albans, that are otherwise considered suitable for development and would therefore be an appropriate alternative for the proposed development.
- 6.25 In this regard, and with the careful design of drainage features and the arrangement of development, the proposed development is considered appropriate.

Renewable and low carbon energy

- 6.26 The planning system should support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure (paragraph 157 refers). New development should be planned for in ways that can help to reduce greenhouse

gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

- 6.27 In respect of location, the application site is highly accessible which maximises the opportunity for walking and cycling and journeys by public transport to minimise private car use. Much of the application site is south facing and orientation to secure passive solar gain would be considered at the detail design stage. Although environmental standards is a policy area that has been subject to uncertainty, as is referred to elsewhere, a clearer direction of travel has been set out in the Government's more recent response to the Consultation on the Future Homes Standards. The improvements in energy efficiency standards for new homes that the revisions to the Building Regulations will deliver in 2025 will contribute to the reduction in greenhouse gas emissions.

Conserving and enhancing the natural environment

- 6.28 Paragraph 180 seeks to protect and enhance the natural and local environment. Whilst there will be an inevitable change to the character and appearance of the application site, the proposals have, wherever possible, sought to protect and enhance important landscape assets including woodland, trees, and hedgerows. A considered approach to green infrastructure ensures new landscaping achieves visual, aesthetic and climate change mitigation as well as habitat creation and a net gain in biodiversity and habitat. The ancient woodland at Longspring Wood is afforded appropriate protection to avoid the deterioration of its important habitat features. An alternative footpath route to the public right of way within the Woodland to discourage recreational disturbance at this local wildlife site could be provided as part of the landscape design. Together, these measures ensure that significant harms to biodiversity are avoided, adequately mitigated and compensated, as required by paragraph 186.

Facilitating the sustainable use of minerals

- 6.29 Paragraph 218 states that non-mineral development proposals should not normally be permitted in Mineral Safeguarded Areas if it might constrain potential future use for mineral workings. In this instance, the application site is, in part only, within a minerals consultation zone. However, the Minerals Authority do not consider this to be an overriding reason not to develop Woollam Park and does not expect any prior extraction.

Proposed amendments to the NPPF

- 6.30 In July 2024, the Government issued a Written Ministerial Statement concerning *inter alia* proposed revisions to the NPPF. The Government's intention is that the planning system enables the construction of 370,000 new homes per annum; an increase from the previous target of 300,000 and actual housing completions of 158,000 achieved in 2023 (ONS, July 2024).
- 6.31 The Written Ministerial Statement and the intention therein to improve housing supply, is a material consideration. This affords support to the positive determination of this planning application. This is especially so in the local context of housing land supply and housing delivery, which is discussed in the following section.
- 6.32 The proposed amendments to the NPPF have been subject to public consultation, which commenced on 30th July 2024 and concluded 24th September 2024. As part of its 2024 statement on budget, the Government confirmed that it plans to respond to the consultation before the end of the year to confirm pro-growth reforms to the planning system.
- 6.33 Amongst those potential revisions are changes to the calculation of local housing need by reference to a new "standard method". This indicates that the Local Plan's housing requirement could increase from 885 to 1,544 dwellings per annum; a 75% increase. In this context, the proposed development would be even more significant.
- 6.34 The consultation document also adjusts the phraseology associated with reviewing the Green Belt in order to meet identified development needs. This underscores the approach which the District Council has adopted and the pragmatism it has applied to how development needs can be met.

Synthesis

- 6.35 As a residential led mixed-used development the proposal will provide a range of houses to meet the needs of the present and future generations whilst fostering a well-designed place taking advantage of its highly accessible location and providing substantial areas of open space that will support the community's well-being. Investment in active travel measures between the site and key destinations will provide opportunity both for the future resident population and the existing population to capitalise on the compact nature of St Albans.
- 6.36 By careful design, and with adherence to the development strategies that inform the detailed design that is to follow, the proposed development will achieve an efficient use of land and the provision of much needed housing within a framework of multifunctional green and blue infrastructure that will deliver a wide range of natural environment benefits. Economic benefits also arise from the non-residential uses that are proposed.
- 6.37 Whilst the proposed development would, for the most part, constitute inappropriate development in the Green Belt, notwithstanding that great importance is afforded to this designation, very special circumstances exist that justifies the grant of planning permission in this instance.
- 6.38 It is evident that the proposed development will contribute to many planning policy objectives of the NPPF, including paragraphs 8, 60, 96, 103, 108, 109, 114, 115, 128, 135, 153, 154(b), 157, 165, 180, 186, and 218. Importantly, in this context, its benefits comply with a great many of the NPPF's policies and are substantial.
- 6.39 In this instance, given the circumstances that exist in the District, the social, economic and environmental objectives of sustainable development are particularly relevant.
- 6.40 This high degree of compliance with the NPPF is a material consideration that weighs heavily in favour of the grant of planning permission.
- 6.41 Paragraph 11d of the NPPF guides the decision maker in the following terms: where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless:
- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.42 In this instance, because of the aged nature of the 1994 Local Plan, there are no policies that meet current and future development needs and counterpart policies that restrict new development are framed only by requirements that were germane many years ago. Moreover, by reference to footnote 8 the two measures set out there have been triggered for a number of years. For both these reasons, the development plan must be considered out of date.
- 6.43 Whilst Green Belt is amongst the policy areas cited in footnote 7, the fact very special circumstances can be justified neuters the first limb. For this same reason, it follows that the adverse impacts of granting planning permission would not significant and demonstrably outweigh the benefits of the proposed development in limb 2.

7 The emerging Local Plan

- 7.1 The District Council is progressing a new Local Plan, and this section describes the content of the current Regulation 19 Plan that was published as a consultation document in September 2024. This is highly relevant to this planning application as it represents a further example of where the District Council has proposed North St Albans as a Broad Location for future development.

The Regulation 19 Local Plan – September 2024

- 7.2 Providing a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations is an objective of the emerging Local Plan; Table 1.2 of the consultation document refers.
- 7.3 The consultation document acknowledges there is “*a clear need*” for more homes in the District. It refers to a supply of first family homes to purchase, affordable homes to rent and buy, as well as opportunities for downsizing and self and custom housebuilding. These are all important to provide more local people with the opportunity to live and work in the District.
- 7.4 To achieve a sustainable pattern of development, the settlement hierarchy at Table 1.3 categorises different settlements to reflect the characteristics. Rightly, and consistent with the 1994 Local Plan, St Albans City is afforded the status of a city at the pinnacle of the settlement hierarchy; the only such settlement with the administrative area, with the intention that it retains its pre-eminent role. The spatial strategy provides the basis for allocating locations for growth.

Spatial Strategy

- 7.5 **Strategic Policy SP1** adopts the NPPF’s standard method as the measure of local housing need and proposes that 885 new homes are built each year. This totals 14,603 new homes between 2024 and 2041.
- 7.6 Whilst there is a priority afforded to developing previously developed land in the first instance, the overall scale of new housing necessary cannot be met by this source alone. Reflecting this widely accepted fact, the consultation document proposes a number of urban extensions termed “Broad Locations”.
- 7.7 Broad Location 5, shown on the key diagram at Figure 1.3 and listed in Table 3.1, refers to North St Albans as a future development location. It is referred to as comprising the following main land uses: mixed use, residential 2FE primary school site, green infrastructure, transport infrastructure and other community infrastructure. It is suggested to have an “indicative capacity” of 1,146 in Table 3.1. It is the largest Broad Location, contiguous with the existing St Albans urban area.
- 7.8 Table 3.2 suggests a housing trajectory for the plan period and foresees development at the Broad Locations from 2031/32 onwards. This is not a phasing policy and is based on a stepped trajectory over the plan period which assumes only 485 new homes per annum up to 2030/31. The merit of such an approach is a matter for the Local Plan process in due course, however, the earlier development is brought forward the greater the positive impact on housing supply and housing delivery.

The North St Albans Broad Location

- 7.9 **Part B** of the consultation document provides site specific commentary for its proposed allocations. For North St Albans, the key development requirements comprise the following:
- (1) Specialist accommodation;
 - (2) A 2FE primary school, including Early Years provision;
 - (3) A new local centre to provide local services, including Medical Centre and commercial development opportunities;
 - (4) Replacement of the displaced playing fields;

- (5) Either on-site outdoor sports provision to meet the additional needs generated by the development or improvements to an existing off site facility;
- (6) Contributions / enhancements to support transportation measures;
- (7) Support for a transport network (including walking and cycling links) and public transport services upgrades / improvements;
- (8) Pedestrian and cycle links with Sewell Park; and
- (9) Improvements to the Public Rights of Way network to enable active travel and recreational use to Heartwood Forest and Nomansland Common.

7.10 In addition, development proposals must:

- (1) take appropriate account of the ancient woodland, County Wildlife Site, Priority Habitat and trees covered by Tree Preservation Order along the south-east boundary, and the Priority Habitat close to the eastern boundary comprising an area of deciduous woodland;
- (2) provide appropriate mitigating measures for noise from the adjoining railway line; and
- (3) take appropriate account of the source protection zone; bedrock aquifer; superficial aquifer.

7.11 *Appendix 6* illustrates how the proposed development reflects these criteria.

Development Proposals in Broad Locations

7.12 **Policy LG1** concerns the Broad Locations as a whole and lists the criteria development proposals must achieve. *Appendix 7* illustrates how the proposed development reflects these criteria.

Green Belt

7.13 **Policy LG5** concerns uses in the Green Belt indicating they will be assessed in accordance with national policy. **Policy LG6** intends that a Green Belt compensatory strategy sets out such measures.

Housing

7.14 **Policy HOU1** identifies a housing mix that development proposals should follow. As this application is in outline form, specific detail on mix and sizes of dwellings will follow at detailed stage but will have regard to local needs information available to justify the mix of new homes to be provided

7.15 **Policy HOU2** specifies the approach to affordable housing for new developments to achieve. In this instance, the proposed development will provide 40% of the total number of new homes as affordable homes; 400 such homes represents a significant supply. As explained in the accompanying *Affordable Housing Statement*, given the likely duration of the build period, the applicants propose an affordable housing scheme for each phase that will determine tenure and mix at the point reserved matters approvals are sought. The applicants do not propose that the C2 care home provides affordable housing as this is a residential institution not a dwelling house; dividing C2 care home accommodation between market and affordable housing is not considered operationally feasible.

7.16 **Policy HOU3** concerns specialist housing and affords support to those components of the proposed development – the care homes, the age restricted specialist elderly persons accommodation and the adult disability service units. These elements will make a material contribution to meeting the needs identified in Tables 4.2, 4.3 and 4.4.

7.17 **Policy HOU4** specifies accessible and adaptable housing requirements and the proportions listed in criteria (b) and (c) can be secured either as a planning condition or planning obligation.

7.18 **Policy HOU5** specifies that 3% of the total number of dwellings proposed at a Broad Location should be in the form of a self or custom build premises. The applicants can only market those plots as a first principle and it has no control over the take up. The terms of this form of provision can be determined through a planning condition or planning obligation.

Retail

- 7.19 **Strategic Policy SP6** concerns city, town and village centres and retail. Criterion (h) and Table 6.1 identify that each Broad Location will have local centres to serve the day-to-day needs of its future resident population. On this basis the retail component proposed within the local centre is intended to internalise trips from the future resident population and is scaled accordingly. The restrictive policy approach in Policy TCR2 should not apply in this instance or else the two policies conflict with one another and the site-specific intent should take priority.

Community infrastructure

- 7.20 **Strategic Policy SP7** relates to community infrastructure and intends that provision is made for improving or providing additional community infrastructure where required as an impact of new development. Elements of community infrastructure are included within the local centre for this purpose, including a community meeting space and healthcare. The latter reflects the published Infrastructure Delivery Plan (IDP) which identifies the need for additional space in this regard. The applicants have identified in its *draft heads of terms for a planning obligation* the potential for financial contributions towards various elements of community infrastructure which also reflect the IDP.
- 7.21 **Policy COM1** relates to education and intends that major development makes provision for new schools and early years facilities. In this instance such provision is intended to be provided on site to reflect advice from the Local Education Authority and in accordance with criterion (b). This will be the subject of a planning obligation.

Transport

- 7.22 **Strategic Policy SP8** indicates that the Council will prioritise the use of active travel and sustainable modes and deliver accessibility improvements. **Policy TRA1** lists how major development proposals should include measures to reduce the need to travel by private car, deliver active and sustainable connections to key destinations, be served by public transport, provide safe, direct and convenient routes by active journeys and be integrated with existing pedestrian and cycle and public rights of way. **Policy TRA4** lists parking standards for different forms of development. Consistent with the overarching transport strategy, new development at Broad Locations should prioritise sustainable and active modes of transport and parking provision may be reduced where attractive alternatives to the private car would lead to reduced demand. Car clubs, bike and e-bike shares schemes and electric vehicles are encouraged. The location of the proposed development enables active and sustainable travel. The proposed development is firmly based on these principles and the *Travel Plan* includes the measures the Policy lists.

Utilities Infrastructure

- 7.23 **Strategic Policy SP9** requires that development proposals must not impact on existing utilities infrastructure provision and mitigation measures may be necessary. **Policy UIN1** concerns broadband provision. The accompanying *Utilities Statement* describes the available infrastructure locally.

Natural environment, biodiversity and green infrastructure

- 7.24 **Strategic Policy SP10** intends that green and blue infrastructure is protected and enhanced. **Policy NED1** intends to enhance tree cover in the District and protect existing woodland. Development at identified Broad Locations should provide at least 1-semi mature tree for each new dwelling. Ancient Woodlands must be protected from damage. **Policy NEB5** intends that watercourses and their settings will be protected for their biodiversity value. **Policy NE6** protects designated areas and species. Relevant development proposals must meet a minimum of 10% net gain in biodiversity.
- 7.25 **Policy NE8** concerns flood risk. The proposed allocations have been subject to a Strategic Flood Risk Assessment which has identified extent of flood risk. The presence of surface water run off is described in the applicants' Flood Risk Assessment which provides relevant information to address the requirements of this policy. Whilst the sequential test identifies other sites with a lesser extent of flood risk, it is instructive that none of those represent reasonably available sites that would

displace the important role of North St Albans in contributing towards the District's housing need and the spatial strategy to achieve this in a sustainable matter.

- 7.26 **Policy NEB9** concerns agricultural land. The policy would exempt development allocated in the Plan. It replicates the policy provisions in the 1994 Local Plan.
- 7.27 **Policy NEB10** lists landscape and design requirements that development proposals should incorporate. As explained in the *Design and Access Statement*, the landscape strategy illustrates how existing features have been protected and, where necessary, a loss is mitigated by new planting and habitat creation.
- 7.28 **Policy NEB12** establishes principles for the provision of *new green space* within new development. The approach adopted towards the areas of green space within the development reflect the vision for this new neighbourhood and provides multifunctional spaces.
- 7.29 The provision of open space is shown in Table 4, with a total of 17.5 hectares to be provided.

Table 4 Open space provision

OPEN SPACE CATEGORY	DRAFT LOCAL PLAN REQUIREMENTS	THE PROPOSED DEVELOPMENT
Amenity green space	3.67ha	6.03ha
Natural and semi-natural green space	8.3ha	8.80ha
Parks and gardens	1.7ha	2.88ha
Total multi-functional green space	13.67	17.71ha
Children's play areas	0.14ha	0.18ha
Allotments and productive landscapes	1.08ha	0.67ha
Total	14.89ha	18.56ha

- 7.30 Because of the importance of managing surface water flows and achieving mandatory biodiversity net gain, alongside the important housing components of the scheme and the principle of achieving an efficient use of land, the open space typologies proposed reflect the characteristics of this development rather than rigidly applying the standards in Table 10.1.
- 7.31 Whilst in overall terms an amount of open space significantly in excess of those standards is proposed, its composition reflects the Vision for Woollam Park. In this regard, the proposed development does not provide playing pitches on-site but rather off-site improvements are proposed at Toulmin Drive, which are permissible under the terms of the Broad Location Policy. Similarly, the provision of formal allotments are not considered compatible with an inclusive community and the vision established for Woollam Park and community growing spaces are proposed as an alternative. Allotments in the conventional sense (plots, hard standing, ancillary buildings etc) do not represent an efficient use of the land within the Site and their provision is considered to prejudice other important outcomes intended for this Broad Location.

High quality design

- 7.32 **Policies SP12 and Policy DES 1** concerns the design of new development. **Policy DES2** concerns new public spaces. The accompanying *Design and Access Statement* describes how at this stage in the planning process the proposed development takes account the character and pattern of the locality, is aligned with the adjoining Sewell Park, responds positively to its context, and is able to deliver an inclusive and diverse community that promotes active lifestyles and well-being.
- 7.33 **Policy DES3** seeks to ensure new development proposals make an efficient use of land. The *land use parameter plan* takes account for the many housing and other land use requirements that the emerging Local Plan intends. This requires a balanced approach to competing considerations and it is not possible in all instances to meet those different aspirations, for example, the various housing components of the Broad Location policy, the design requirements of *inter alia* Policies SP12 and

DES1, the biodiversity requirements of Policy NE6 and the open space standards of Policy NEB12. The proposed development achieves a net density of 44 dwellings per hectare (excluding the Local Centre). This represents an efficient use of land that has regard to various relevant considerations.

- 7.34 **Policy DES5** intends that new development achieves high standard of amenity both for existing and future occupants. It lists considerations and standards against which new development will be assessed. These are matters more directly relevant to the determination of reserved matters applications, but the parameter plans for which permission is sought provide a wholly appropriate framework for those later stages.
- 7.35 **Policy DES6** concerns building heights and seeks to control the height, massing and design of buildings relative to the character and distinctiveness of the surrounding area. The proposed development will have its own character, which will be different to the suburban development that adjoins Harpenden Road which has uncharacteristically large plots and long back gardens and the lower density at New Greens. Notwithstanding this, Sewell Park will occupy the intervening land between the application site and Harpenden Road and the *Design and Access Statement* considers it as an adjoining character area. The form of the proposed development is a combination of various factors including the intended capacity, community infrastructure components, open space requirements and minimum density. The application site is not with a Building Height Control Area.

Health and well-being

- 7.36 **Policy HW1** concerns air and noise pollution. Air quality and noise assessment are required in sensitive locations and where development proposals are found to be affected suitable mitigation should be provided. Such assessments are provided as part of the ES and the effects are considered negligible.
- 7.37 **Policy HW2** concerns light pollution. Whilst the application site adjoins existing floodlit playing fields at Woollam Playing Fields and St Albans Girls School, the *Lighting Assessment* undertaken has considered the conditions that limit their use and lux levels and has identified mitigation measures within the proposed development, where necessary. Lighting as part of the proposed development can be controlled by planning condition.
- 7.38 **Policy HW5** requires a health impact assessment to be undertaken to consider whether there are significant adverse impacts on and to identify mitigation measures. Such an assessment is included with the ES and identifies beneficial effects.
- 7.39 **Strategic Policy SP14** concerns the delivery of infrastructure. New development should make provision for infrastructure that is necessary in order to accommodate additional demand resulting from new development. The likely infrastructure requirements are listed in the accompanying *draft heads of terms for a planning obligation*. This has regard to the District Council's Infrastructure Delivery Plan and the assessment of the project in the ES.

Synthesis

- 7.40 The proposed development exhibits a high degree of conformity with the emerging Local Plan, unsurprisingly given that the District Council has long identified North St Albans as a potential development location and has been consistent as to its component parts. Indeed, North St Albans is a critical part of the overall housing strategy and is a significant part of the supply of new housing over the plan period.
- 7.41 Whilst the emerging Local Plan does not attract full weight, it is notable that the proposed development generally accords with the following draft policies to the extent they are relevant to an outline planning application: Policy LG1, Policy BL1, Policy HOU1, Policy HOU2, Policy HOU3, Policy HOU4, Policy HOU5, Policy SP6, Policy SP7, Policy COM1, Policy SP8, Policy TRA1, Policy TRA4, Policy SP9, Policy SP10, Policy NEB1, Policy NEB5, Policy NEB6, Policy NEB9, Policy NEB10, Policy SP12, Policy DES12, Policy DES1, Policy DES3, Policy DES5, Policy DES6, Policy HW1, Policy HW2, Policy HW5, and Policy SP15.
- 7.42 In respect of Policy NEB12, the overall amount of open space proposed exceeds the amounts specified for multi-functional green space and children's play but includes community grow spaces

in preference to allotments. On balance, this very limited extent of conflict with an emerging policy should not materially diminish the overwhelming extent of accordant otherwise.

8 Other material considerations

- 8.1 Having discussed the development plan and the manner and extent to which the proposed development accords with it, and explained compliance with National Planning Policy and the emerging Local Plan as material considerations, this Section examines other material considerations that are germane to the determination of this application. These are explored under the following headings:
- (1) Progress with a replacement Local Plan
 - (2) Housing delivery
 - (3) Housing supply
 - (4) Housing trajectory
 - (5) Affordability
 - (6) Affordable housing need
 - (7) The housing benefits of the proposed development
 - (8) Other benefits of the proposed development
 - (9) Other planning decisions

A new Local Plan to replace the now time expired 1994 Local Plan

- 8.2 The planning-system in England operates on the basis of a plan-led approach.
- 8.3 The District Council has been persistent in attempting to bring forward a new, up-to-date Local Plan, as it is required to do by statute. Unfortunately, it has so far failed to achieve this and there is no current up-to-date District-wide planning policy framework against which to determine planning applications.
- 8.4 Work on a new Local Plan commenced in 2007, when Issues and Options were considered.
- 8.5 By 2014 the District Council had prepared a Draft Strategic Local Plan which was submitted for Examination in 2016. Immediately on the commencement of the Hearing Sessions, the appointed Inspector concluded that the Plan was not sound because the District Council had not complied with its duty to co-operate obligations.
- 8.6 Following legal proceedings in respect of this, the District Council commenced work on a new Local Plan in 2017. The associated Local Development Scheme intended that the new Local Plan would be adopted by the end of 2020.
- 8.7 In November 2017, the Secretary of State wrote to the District Council, along with 14 other authorities who had failed to make progress in producing a Local Plan and outlined the intention to intervene in plan-making as outlined in the Housing White Paper. A subsequent letter was sent in March 2018 continuing to press the District Council to maintain progress with its new Local Plan.
- 8.8 A Draft Publication Local Plan (Regulation 19) was published as a consultation document in September 2018 and was then submitted for Examination in March 2019. Hearing Sessions were convened in January 2020. Following four days of hearing sessions, on the 27th January 2020, the Inspectors wrote to the Council concerning the Examination citing "*serious concerns in relation to legal compliance and soundness*". Because of this, the Inspectors cancelled further hearing sessions. On this occasion, the District Council chose to withdraw the Plan from Examination in November 2020.
- 8.9 Work on a new Local Plan was re-commenced and in July 2023 the new Regulation 18 Plan was published for consultation. Its timetable anticipates adoption in Spring 2026 assuming no delay in any of the plan-making stage. On the 23rd September 2024, the District Council resolved to consult

on a Regulation 19 plan. On the 28th November 2024, the District Council resolved to submit the plan for examination.

- 8.10 Strikingly it will have taken 30 years for a replacement Local Plan to have been prepared for the District.
- 8.11 The practical consequence of this is widely evident. Designations that restrict new development have endured without any review or alteration. Meanwhile housing delivery has fallen behind objectively assessed levels of need and the supply of housing land has consistently been below the required 5-year supply. In other planning applications, these factors have been found to represent very special circumstances to justify the grant of planning permission.
- 8.12 At the time of writing there is no surety as to whether the Local Plan will proceed with the degree of alacrity required to redress the longstanding absence of an up-to-date development plan framework for decision making. This compounds the severe housing shortfalls in the District. This is a significant material consideration.

Housing delivery

- 8.13 There is an acute and pressing need to increase housing supply in the District.
- 8.14 Over the long term, the average number of new homes built each year in the District totals approximately 500. This is in contrast with various estimates of housing need at the time the successive replacement local plans were prepared.
- 8.15 At the time of the 2014 Local Plan preparation, the District Council indicated the housing requirement to be in the order to 700 dwellings per annum. In the 2018 Local Plan, this has increased to circa 900 dwellings per annum, a figure which is also contained in the 2023 Regulation 18 Plan and 2024 Regulation 19 Plan. With each year, the disparity between objective evidence of the need for new housing and the number built increases. If the 2024 potential revision to the standard method is taken into account, the scale of housing required increases yet further to three times the long-term average.
- 8.16 For successive years the Council has failed to meet the Housing Delivery Test.

Table 5 Housing delivery test

YEAR	HDT MEASUREMENT	HDT CONSEQUENCE
2019	63%	20% buffer applied
2020	63%	Presumption engaged
2021	69%	Presumption engaged
2022	55%	Presumption engaged

- 8.17 This circumstance engages the presumption in favour of sustainable development by reference to footnote 8. The need to significantly boost the supply of new housing in the District is evident. This is significant material consideration.

Evidence of need for family housing

- 8.18 The recently published Local Housing Needs Assessment indicates the mix of housing that is likely to need to be provided during the plan period. It is notable that of the houses built over recent years, less than a third have been three or four bedroom properties, with a corresponding emphasis having been on higher density flats and apartments. This is typical of the constrained housing opportunities that have been available, namely previously developed land in urban locations.
- 8.19 The following tables, reproduced from the Local Housing Needs Assessment, illustrates the consultants' conclusions as to future mix.

Table 6 Housing Mix evidence from Local Housing Needs Assessment

TYPE	AFFORDABLE/SOCIAL RENT	AFFORDABLE HOME OWNERSHIP	MARKET HOUSING
1- bedroom	20%	20%	5%
2- bedroom	30%	40%	20%
3-bedroom	35%	30%	45%
4+ bedroom	15%	10%	30%

8.20 It is instructive that the consultants highlight that the delivery of family homes tends to be focused on suburban locations, larger and greenfield sites. If the identified need for this type of accommodation is to be met, such sites will need to form part of the future housing supply. The proposed development can contribute towards and this is a highly relevant material consideration.

Housing Supply

8.21 For successive years, St Albans has not been able to demonstrate the necessary five year supply of housing land required by national policy.

Table 7 Housing delivery test

YEAR	NUMBER OF YEARS SUPPLY
As at 1st April 2018	2.4 years (standard method) – 3.4 years (h/h projections)
As at 1st April 2019	1.9 years (standard method) – 2.6 years (h/h projections)
As at 1st April 2020	2.4 years (standard method) – 3.4 years (h/h projections)
As at 1st April 2021	2.2 years (standard method)
As at 1st April 2022	2.0 years (standard method)
As at 1st April 2023	1.7 years (standard method)

8.22 This circumstance also engages the presumption in favour of sustainable development by reference to footnote 8 of the NPPF. The need to increase the amount of land available for new housing development is plainly evident. This is a significant material consideration.

Housing trajectory

8.23 The 2024 Regulation 19 Local Plan includes a Housing Trajectory that illustrates the assumptions regarding housing delivery.

8.24 Underpinning this is the notion of a stepped trajectory, where a low level of completions is intended between 2024/25 and 2030/31, which does not exceed 485 dwellings per annum, equivalent to 54% of the annual requirement. The rate of housing completions increases to 1255 for the period 2031/32 – 2035/26 before reducing again to 1025 dpa between 2036/37 – 2040/41.

8.25 Under this approach, development at the Broad Locations is expected from 2022/23 onwards and, with development at Hemel Garden Community, are the primary source of housing completions from that period onwards.

8.26 Plainly, earlier delivery would impact positively on the housing trajectory and that is a benefit of the proposed development being brought forward at this point.

8.27 The housing trajectory is not a precise account of housing supply, but the trends above clearly indicate the importance of new sources of supply to achieving any material increase in housing delivery throughout the plan period. This increase can only be achieved with planning permission

being granted on sites not presently allocated and, because of its delineation, within the Green Belt. In this circumstance, development adjacent to the main settlement is consistent with the spatial strategy and contributes to a sustainable pattern of development.

Affordability

- 8.28 The preceding sections have recounted data about housing completions and housing land supply but the real world consequences of these circumstances are apparent in evidence of affordability and affordable housing need.
- 8.29 St Albans is one of the least affordable places in England and Wales. The Affordability Ratio for Local Authority Areas in England and Wales published by ONS records the ratio for St Albans as 17.6, having increased from 10.3 in 2004. The median house price in St Albans is over £600,000 whilst the median workplace earnings is £36,000. Of the 347 local authority areas in England and Wales, only Kensington and Chelsea, Westminster and Richmond-upon-Thames have a higher ratio than St Albans. St Albans also has the third highest private rental costs outside of the London Boroughs; greater than Cambridge, Oxford and Brighton.
- 8.30 The Sustainability Appraisal prepared for the District Council alongside the Regulation 19 consultation document refers to this in the following terms:
- “Overall the District is very affluent, ranking as the 12th least deprived local authority nationally (out of 317) according to the Index of Multiple Deprivation (2019). However, house prices are so high – averaging £619,567 – that housing is unaffordable for many, let alone for those who are less affluent or experience relative deprivation. The Office for National Statistics (ONS) housing affordability ratio shows St Albans to be a major outlier, and this has a direct bearing on the calculation of local housing need (LHN) under the Government’s standard method (both the existing method, which dates from 2018, and the new method currently under consultation). This ratio applies median workplace-based earnings, and there are alternative ratios that are lower on account of applying residence-based earnings, but the fact remains.”* (paragraph 2.3.7 refers)
- 8.31 In the context where the District Council has a stated objective to provide “a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations” there is an urgency to improving and increasing the supply of new housing if the worsening affordability is to be arrested. This is a significant material consideration.

Affordable housing Need

- 8.32 The 2024 Local Housing Needs Assessment identifies a need for 802 affordable homes per annum (including 449 per annum rented). The Sustainability Appraisal refers to this as “a very high number relative to local housing need” and allights upon “a substantial need for affordable housing” in the District.
- 8.33 This is not a new or recent phenomena and was evident at the time of the previous 2018 Regulation 19 Local Plan.
- 8.34 The number of affordable homes built over recent years has been limited.

Table 8 Affordable housing completions

YEAR	AFFORDBLE HOUSING COMPLETIONS
2013/14	-42
2014/15	70
2015/16	97
2016/17	59
2017/18	106
2018/19	82
2019/20	31

YEAR	AFFORDBLE HOUSING COMPLETIONS
2020/21	169
2021/22	71
2022/23	68
10 year	711

8.35 Whilst this is in part because of the low level of housebuilding, it is inescapable that over the past 10 years, the total number of new homes built is less than a single years' need at the present time. The need to increase the number of affordable homes that are being provided is a significant material consideration. This is acknowledged in the Council Plan 2024-2029 wherein the delivery of more affordable housing is listed as a high priority.

Housing benefits of the proposed development

- 8.36 The proposed development will provide 1000 new homes of various types and tenures in addition to an 80 bed care home.
- 8.37 This represents a material contribution to housing supply in the short term and a surety of supply over the longer term. The applicants propose that 40% of the new homes are affordable homes - totalling some 400 such homes. The contribution to market and affordable housing supply is a very substantial benefit of the proposed development.
- 8.38 Such is the nature of the application site and the character of the proposed development, it is able to provide a breadth of different housing types and achieve a mix of housing sizes indicated as necessary by the housing needs assessment.
- 8.39 A component part of the proposed development is age restricted specialist housing for elderly persons. This reflects the ageing nature of the population. The applicants are aware that the County Council consider that extra care accommodation is required to meet an identified need and that this would comprise a part of the overall provision of affordable housing. Whereas, the District Council wish to prioritise family housing to meet the priority need. The type and tenure of affordable housing will need to be defined in a planning obligation in due course. In the event the extra care accommodation is not part of the 40% affordable housing, the land use parameter plan has sufficient flexibility to enable this to be brought forward as retirement housing. Given the District Council's strategic objective to meet the needs of older people, this aspect of the housing offer is also a substantial benefit.
- 8.40 To meet an identified need, a proportion of self and custom build housing can also be provided as part of the development and land will be safeguarded for this purpose; again this is a benefit of the proposed development.
- 8.41 Taken together, the various housing benefits of the proposed development are very substantial and should be afforded such weight.

Other benefits of the proposed development

Active travel

- 8.42 A shared priority between the County Council and the District Council is the need to invest in active travel in order to change travel behaviour and patterns and reduce the reliance on the private car. This is aligned with national planning policy promoting sustainable modes of travel. The Local Walking and Cycling Investment Plan identifies Harpenden Road as a priority corridor for new and improved walking and cycling measures.
- 8.43 The accompanying *Transport Assessment* has identified measures that will achieve this and towards which the applicant will contribute. This will enable both future and existing residents to access key destination, including the city centre and the railway station, by sustainable modes of travel.

- 8.44 Implementation of priority measures in the LCWIP is a material benefit of the proposed development which weight in favour of planning permission being granted.
- 8.45 Similarly, implementation of the long-held intention to extend footpath connections from Sandridgebury Lane to the Hertfordshire Way set out in the Public Rights of Way Improvement Plan and the Sandridge Neighbourhood Plan is a material benefit that also weighs in favour of planning permission be being granted.

Zero carbon community

- 8.46 The *Sustainability Strategy* focuses on reducing carbon emissions from the three biggest sources of emissions associated with new development, transport, operational energy use, and embodied carbon.
- 8.47 *Transport*: The development is in a highly sustainable location with access to a range of local services and amenities, including the proposed primary school and local centre. The *Travel Plan* will support the uptake of travel by sustainable modes.
- 8.48 *Operational Energy Use*: The development will be designed in line with the Government's Future Homes Standard as a minimum, with an ambition to go beyond this and deliver homes which are net zero in carbon emissions associated with regulated energy use where viable. This will be achieved through the application of the energy hierarchy and a fabric first approach which aims to reduce energy demand in the first instance, followed by the use of on-site renewable energy generation such as ASHP and Solar PV. The development will be all-electric, without the use of fossil fuels for heating or hot water.
- 8.49 *Embodied Carbon*: All homes will aim to achieve best practice embodied carbon targets in line with the RIBA Climate Challenge. At detailed design, developers will be required to undertake a Lifecycle Assessment (LCA) on a representative sample of their dwelling types and implement measures to reduce embodied carbon.
- 8.50 The proposed development contribution to reducing greenhouse gas emissions is a significant material consideration.

Economic benefits

- 8.51 The accompanying *Economic Benefits Statement* prepared by Hardisty Jones Associates identified the estimated construction value, construction stage employment and the construction stage gross and net impacts as well as operational phase employment levels and local expenditure. Reflecting the scale of the proposed development, these represent substantial positive economic effects and are important material considerations.

Other planning decisions

- 8.52 Whilst each planning application should be determined on its own merits, other planning decisions in the District provide a material context for the consideration of this scheme.
- 8.53 Planning permission was granted by the LPA for development at Sewell Park, citing very special circumstances for doing so; the housing benefits were found to clearly outweigh the harm to the Green Belt and other harms.
- 8.54 Similarly, a number of appeals have been allowed and planning permission granted where similar issues have been considered (e.g., Park Street - 3343986, Bullens Green - 3265925, Chiswell Green - 33113110, 3312277). Each of these decisions, including those of the Secretary of State in relation to Chiswell Green, rightly afford substantial weight to the definitional harm to the Green Belt by reference to inappropriate development. Each however, goes on to consider the substantial or very substantial housing benefits that occurred in those instances and conclude that those benefits and other considerations outweighed the harms.
- 8.55 In this regard it is instructive that the Secretary of State concluded the following in respect of housing at the Chiswell Green appeal.

"(28) The Secretary of State agrees with the Inspector that there is a very substantial need for housing in the district which is persistently going unmet, that the Local Plan housing requirement

is hopelessly out of date, and that, using the standard method, the Council can demonstrate just a two-year housing land supply at best. He also notes that the latest HDT has been failed by some margin. Therefore, the presumption in favour of sustainable development is triggered, in accordance with footnote 8 to paragraph 11(d) of the Framework.

(29) For the reasons given in IR586-591, the Secretary of State agrees with the Inspector that in the context of such a great housing need, very substantial weight should be attached to the proposed housing."

- 8.56 Consistency in decision-making is an important principle and the above illustrates how the matters or principle that arise in the instance of this planning application have been addressed in the recent past.

Synthesis

- 8.57 There is an identified need to increase the supply of new housing in the District. This has arisen because of the aged nature of the extant 1994 Local Plan and the low levels of housing completions over many years relative to evidence of local housing need. The proposed development will make a notably important contribution to improving supply in the short term and providing surety of supply over the longer term. Allied to this are a number of notable social, economic and environmental benefits; the range and types of new housing opportunities provided, local job creation and increased local expenditure, biodiversity net gain, habitat creation, investment in social infrastructure and active and sustainable modes of travel and net zero development. These benefits reflect the high degree of compliance with the emerging Local Plan. Together, these material considerations strongly support the grant of planning permission.

9 Very special circumstances

- 9.1 Both the Local Plan and national planning policy permit inappropriate development in the Green Belt where very special circumstances exist. Very special circumstances exist where the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 9.2 The extent of very special circumstances in this instance are set out below.
- 9.3 **There is no “up-to-date” Local Plan to guide current and future development in St Albans.** The 1994 Local Plan is effectively the oldest Local Plan in the Country; its end date was passed 23 years ago. Its development allocations and proposals were framed by the requirements that existed at that time and plainly it does not provide for current and future development needs.
- 9.4 **The boundary of the Green Belt is delineated in the context of the aged development needs over the period to 2001.** By the present time, all of the District’s settlements are contained by the Green Belt. Any expansion of those settlements to meet current and future development would need to occur on land within the Green Belt.
- 9.5 **There is a demonstrable need to increase housing supply in the District.** The Government’s Standard Method for assessing Local Housing Need indicates a requirement of some 900 dwellings per annum, whereas, and absent any more recent Local Plan, the long-term average of housing completions has been half this. There is no prospect of this being remedied in the short term.
- 9.6 **The Council has failed to meet the two measures of housing supply in the NPPF for successive years.** The Council does not have a 5-year supply of housing land and has not met the housing delivery test. There is no evidence that its Action Plan has demonstrably improved housing supply. The housing trajectory within the Regulation 19 Local Plan illustrates that housing supply will not improve in the short term.
- 9.7 **Housing affordability is especially acute.** St Albans is amongst the least affordable areas in the Country, a characteristic that is recorded by the District Council as an issue for many people. Its consultants’ phrase this as a “major issue locally” in the Sustainability Appraisal. The delivery of new social housing is one of the areas of “high priority” in SACDC’s Council Plan (2024-2029).
- 9.8 **There is an identified need for family sized housing.** The evidence of future housing mix supports the provision of new and different sources of housing supply than have been prevalent in the District.
- 9.9 **Additional land will need to be identified to meet local housing need.** The Council’s housing trajectory confirms the paucity of supply relative to local housing need; over the next plan period, the Council will need to identify land some 10,000 new homes in addition to existing commitments. Only to a very small extent can this residual requirement be satisfied on previously developed land.
- 9.10 **Future housing land will need to be provided on land currently within the Green Belt.** This is widely accepted and is not materially different to the 2014 or 2018 Local Plans where the need to allocate additional housing land was accepted by the District Council as an exceptional circumstance to amend its Green Belt boundary.
- 9.11 **There is no genuine alternative to development in the Green Belt.** In response to the test in para 146 of the NPPF, the Council has emphasised that none of the South-West Hertfordshire authorities has the ability to meet any other authorities’ housing requirements on non-Green Belt Land (or AONB in the case of Dacorum). An early iteration of the South-west Hertfordshire Joint Spatial Plan identified the need for development in the Green Belt across constituent authorities.
- 9.12 **The new Local Plan will not amend the Green Belt boundary until 2026 at the earliest.** The Local Development Scheme anticipates the new Local Plan will be adopted in Spring 2026. Achieving this requires a particularly effective and efficient plan-making process without any slippage. The District Council do not anticipate a material increase in housing delivery until 2031.

9.13 **Meanwhile, there is no remedy to the marked and intractable shortage of housing land supply without planning permission being granted on land within the Green Belt.**

9.14 These considerations represent very special circumstances to justify, as a matter of principle, new housing development in the Green Belt. Certainly, these above circumstances are unique to St Albans.

Harm to the Green Belt

9.15 Harm to the Green Belt arises in definitional terms and substantial weight is afforded to this in accordance with NPPF paragraph 153. Unless and until this land is removed from the Green Belt through the new Local Plan, this harm is inescapable.

9.16 That said, in terms of the actual effects, it is important to consider the contribution this land serves towards Green Belt functions as defined by paragraph 143. These are discussed below:

9.17 The **SKM Green Belt Study** identified that the land comprising North St Albans makes a partial contribution towards maintaining the existing settlement pattern and makes a limited or no contribution towards checking sprawl, preventing merging of settlements and preserving setting. Its characteristics in this regard will not have changed since this Study was undertaken in 2013/2014; the passage of time will not change this conclusion because, and by virtue of the designation, there has been little material change to the use of land within the Green Belt.

9.18 All Green Belt land contributes to some degree towards safeguarding the countryside from encroachment (and assisting in urban regeneration, by encouraging the recycling of derelict and other urban land); as such there is no distinguishing factor between sites in this regard. The proposed development will amount to an encroachment into the countryside, but that occurs in a contained manner as a consequence to the Site's established boundaries and adjoining land uses. Given that the replacement playing fields are appropriate uses in the Green Belt, that aspect of the scheme does not conflict with Green Belt purposes and these pitches further serve to contain the development. Given its siting and scale, the inclusion of a building in the form of the sport pavilion annex in the south-west corner of Longcroft does not affect the openness of the Green Belt or the purpose of including land within it; it does not exceed the "tipping point" implicit in paragraph 154(b) of the NPPF.

9.19 Significantly, in the location of the Application Site, a reduction in the gap between St Albans and Harpenden "*would not significantly compromise*" the physical separation of these settlements. The SKM Study considered that development at North St Albans would not have any greater effect on physical separation and equally would have little genuine harmful effect on settlement pattern and would reinforce the existing role and function and concentration of housing at the District's main settlement.

9.20 Therefore, notwithstanding the definitional harm, and with the land only contributing at most a limited contribution to other Green Belt purposes, harm to the Green Belt purposes must be considered only to be limited in overall terms.

9.21 The more recent **Arup Study** assesses individual fields or parcels. It does not aggregate areas and does not have a corresponding assessment of North St Albans as a whole or the application site. This is a product of the methodology applied and is of limited value. It is logical that a Green Belt field that adjoins an urban area serves to contain it and restricts its growth; equally it is logical that a field removed from the urban fringe serves to protect the countryside from encroachment. Viewed in these narrow terms, it is understandable why the Arup methodology concluded that these fields serve a Green Belt function and should not be removed from the designation. Critically the Arup Study re-affirms that in respect of the second Green Belt purpose; the fields form a 'less essential' gap, or the less essential part of a gap, which is of sufficient scale and character that development is unlikely to cause merging between settlements.

9.22 It is important to recognise that the Green Belt Study is not a tool that should not determine the balance between preservation of the Green Belt against the benefits of meeting identified development needs.

9.23 Development of the site would affect the openness of the Green Belt, changing its character from agricultural fields to built development. However, the site's boundaries either do, or can, clearly define the built envelope. The area of built development would be bounded by these features and a compact high-quality masterplanned development would not represent urban sprawl that would harm the openness of the remaining Green Belt beyond the site. A distinction can be drawn between planned urban extension at North St Albans, characterised by holistic planning, design and appropriate densities, resulting in compactness and containment, and urban sprawl that would harm openness which Green Belt policy is designed to prevent.

Other harms

9.24 In addition to the harm to the Green Belt, which attracts substantial weight, are the following disbenefits.

9.25 **Loss of agricultural land:** The proposed development will result in the loss of agricultural land, part of which is grade 3a. This is inevitable if St Albans' current and future development needs are to be met. The site has previously been identified as suitable for residential development by SACDC, and given the overriding need for new housing, the proposed development does not conflict with Policy 102 of the Local Plan.

9.26 **Change in character and appearance:** The character and appearance of the application site will change as a consequence of the development. Again, it is inevitable that the character and appearance of land on the edge of St Albans will change if the District's current and future development needs are to be met.

9.27 The visual envelope of the application site is limited and the change will be experienced by only a limited number of receptors; this effect is localised only, and for the most part is seen in the context of existing or future development and urban infrastructure.

9.28 The application site is not a valued or designated landscape and has limited landscape features. Its characteristics are not above the ordinary. Whilst some trees and hedgerows will be removed to facilitate development, these have been minimised by the careful placement of development. Overall, the proposed landscape and habitat creation will result net gains that mitigate the necessary change in character and appearance.

9.29 Other environmental effects, for example, soundscape changes, air quality condition, some loss of habitats and trees and hedgerows, have been judged to be minor or negligible harms and have been suitably mitigated or compensated, wherever possible, and are in any event necessary to realise the many benefits of the scheme.

Benefits

9.30 The benefits of the proposed development comprise the following:

9.31 **Development in accordance with the District's established spatial pattern.** St Albans City is the main urban settlement within the plan area. It is the most accessible location for future development, with the widest range of services and facilities. Development at North St Albans is wholly consistent with the current and emerging Local Plan's Settlement Strategy, and would reinforce the established spatial pattern. The proposed development's contribution to a sustainable pattern of development is a significant benefit.

9.32 **A scheme of 1000 new homes would make a material contribution to improving housing supply.** This would improve available housing land in the short term whilst providing surety of supply over the longer term. This would be a significant benefit of very substantial weight given the circumstances that exist.

9.33 **The proposed development will provide a wide-ranging housing offer.** The proposed development would provide market housing, affordable housing, specialist accommodation for the elderly, adult disability service units and self and custom build housing opportunities. Individually and collectively this housing offer contributes towards meeting identified housing needs. A housing mix can be provided that reflects the evidence of local housing need in the South-west Hertfordshire Local Housing Needs Assessment.

- 9.34 **New facilities to support community cohesion.** A new local centre will provide community facilities that will support the new neighbourhood; a new two-form entry primary school, community facility and meeting space, local retail provision and healthcare. The mix of uses supports principles in LPT4 and national policy to prioritise active and sustainable travel patterns.
- 9.35 **Investment in local sporting facilities.** The proposed investment in playing pitches and facilities at Toulmin Drive Recreation Ground will make a positive contribution to improving sporting infrastructure which are acknowledged to be of poor condition.
- 9.36 **A comprehensive green infrastructure strategy.** The draft Masterplan proposals afford a particular importance to landscape and biodiversity to create a well-planned and attractive new neighbourhood for St Albans. Whilst there will be a change in the site's character, and a loss of agricultural land (in part best and most versatile land), new habitat creation, hedgerow planting and reinforcement, tree and woodland planting, and sustainable drainage will achieve a net gain in biodiversity. New community growing spaces are proposed that foster an inclusive community. This mitigates the change in character and appearance of the application site.
- 9.37 **A well-located development that can capitalise on existing sustainable travel corridors.** The A1081 Harpenden Road is well served by public transport and new development would enable investment to further improve the frequency of buses between the Site and key destination, including the city centre and the railway station, as part of a City-wide strategy; discussions with local bus operators have confirmed their support for such measures. Hertfordshire County Council has also identified Growth and Transport Plan Schemes / Local Walking and Cycling Improvement Plan priority measures – the A1081 cycle corridor and Green Ring - towards which funding can be directed. These measures, which are aligned with initiatives that the Local Transport Plan promotes, will improve accessibility for new and existing residents to the north of the City.
- 9.38 **Implementation of Public Right of Way Improvements.** The Hertfordshire Public Rights of Way Improvement Plan promotes the development of links from towns into the countryside by extending and enhancing links through development proposals. The draft Masterplan intends to create of a new footpath link north of the proposed development that would extend the current public right of way within the Site to the Hertfordshire Way situated to the north from where access to Heartwood Forest is achieved. This new pedestrian route would provide a safe and convenient link to an established and significant recreation resource.
- 9.39 **A low carbon energy Strategy.** A sustainability strategy will be developed that promotes low and zero carbon energy measures. This reflects the Government's Future Homes Standard with an ambition to go beyond this and deliver homes which are net zero in carbon emissions associated with regulated energy use where viable and reduce embodied carbon. The aspiration to locally achieve net zero carbon emissions target by 2030 is one of the areas of "high priority" in SACDC's Council Plan (2024-2029).
- 9.40 **Governance and Stewardship.** A Governance Strategy will be development to support the creation of a Community Management Organisation with whom local community assets will be vested for long term stewardship.
- 9.41 **Economic Benefits:** The total construction cost is provisionally estimated at around £250 million for the proposed development, which equates to an estimated £25 million per annum over the 10-year construction period. Over the entire construction phase, delivery of the proposed development is estimated to support gross direct employment in the construction sector equivalent to 3,200 person-years of employment (320 person-years per annum), and wages of £110 million (£11 million per annum). Taking account of additionality factors indicates a net additional local impact of 1,600 person years of employment to residents of the City and District of St Albans (160 person-years per annum), supporting wages of 57 million (£5.7 million per annum).
- 9.42 Once operational the proposed development is estimated to accommodate 320 - 340 FTE jobs. After allowance is made for part-time working this increases to an estimated 360 - 390 total jobs. This level of FTE employment would support wages of £8.4 - £9.1 million per annum in the local economy.

- 9.43 Taking account of additionality factors indicates a net additional local impact of 180 - 190 FTE jobs equivalent to 200 - 210 total jobs for residents of the City and District of St Albans, supporting wages of £4.9 - £5.2 million per annum. This will provide a substantial additional boost to the local economy in terms of both job and income creation.

Conclusion

- 9.44 The proposed development will cause definitional harm by reason of inappropriateness; this is afforded *substantial negative weight*. In this location, the Green Belt's functions, whilst not insignificant, are limited and importantly the development would not result in coalescence between St Albans and Harpenden, with the separation between these two settlements is maintained and the established spatial pattern retained. The openness of the application site would be lost, but its boundaries serve to contain development to such an extent that it would not represent sprawl and openness beyond the application site would be retained and the visual effect of the development is especially limited. The proposed development would represent encroachment into the countryside but that is true of any such development and is inevitable if current and future development needs are to be met at St Albans; this circumstance militates the extent to which this is a decisive factor. Nevertheless, this harm attracts **substantial negative weight**.
- 9.45 **Moderate negative weight** is afforded to the to harm to the character and appearance of the area again reflecting the application site's characteristics, the contained nature of the site and the presence of urban development and activity that frame the site. The loss of agricultural land also attracts **moderate negative weight**. Other harms attract **limited negative weight**.
- 9.46 There is a persistent and acute housing shortage of housing in the District; affordability is especially striking as is the scale of affordable housing need. The proposed development would make a significant contribution towards addressing these needs in the form of market housing, affordable housing, self-build and custom housing, and specialist housing. This will contribute to meeting the need for housing in the short term and provide a surety of supply in the longer term. In these circumstances, the housing benefits attract **very substantial positive weight**.
- 9.47 The other benefits of the proposed development – its contribution to a sustainable pattern of development and investment in the delivery of the LCWIP priority corridor, new community facilities, a new recreation route to the Hertfordshire Way consistent with PROW improvement plan - are of each of **moderate positive weight**. The overarching objective to achieve a net zero community attracts **substantial positive weight**. Similarly, the economic benefits are of a scale that attract **substantial positive weight**.
- 9.48 Taken in the round, and in the context of firstly the District's failure to bring forward a new Local Plan to replace the 1994 plan with any degree of alacrity, and the status of the application site in successive versions of the emerging Local Plan, these notably important benefits outweigh the harm to the Green Belt and other harm and represent very special circumstances to justify the grant of planning permission.

10 Planning assessment

10.49 The section provides an overarching assessment of the proposed development in response to relevant planning considerations that the scheme gives rise to.

Suitability of location

10.50 As a matter of principle, the application site represents a wholly appropriate location for new housing, adjacent to the District's main settlement and accessible to existing services, both local to the site and at the city centre. New housing development in this location is entirely consistent with the spatial strategy in Policy 2 of the 1994 Local Plan where St Albans was the focus for new development and, understandably, consistent with the NPPF, this continues to be the intent of the emerging Local Plan.

Parameter plans

10.51 The parameter plans, which provide a pictorial illustration of the proposed development, represent a wholly appropriate arrangement of land use across the application site.

10.52 The proposed density and building heights are also wholly appropriate, especially in the context of the importance afforded to ensuring an efficient use of land and increasing the intensity of development in accessible locations.

Provision of housing

10.53 The many and varied housing components of the proposed development all respond to an identified need and represent a substantial benefit and comply with the role afforded to this Broad Location in the emerging Local Plan. The mixed-use nature of the proposed development ensures that the future resident population have supporting facilities and services conveniently accessible at the Local Centre.

Residential amenity

10.54 As an outline planning application, the residential amenity of future occupiers will be determined through future reserved matters applications. There will be no direct negative impact on the amenity of residential properties adjacent to the site.

Transportation and highways

10.55 Reflecting the application site's location, there exist opportunities to promote active and sustainable modes of travel. The applicants' transport strategy corresponds to the Local Transport Plan's objective to change travel behaviour and encourage alternatives modes of travel to the private car. Consistent with the emerging Local Plan, opportunities to invest in Local Walking and Cycling Schemes exist and are part of the off-site improvement measures. Whilst the proposed development will increase traffic on the local network, the applicants' approach is to focus on active travel measures rather than highway capacity improvements. This approach is supported by the local highway authority.

Impact on character and appearance

10.56 The application site is not a valued or designated landscape and its characteristics are not above the ordinary.

10.57 The character and appearance of the application site will change as a result of the proposed development. Wherever possible, existing landscape features, most notably hedgerows and important trees, have been retained. There will however be a loss of some trees to form the access on Harpenden Road and hedgerow breaks to enable routes within the development. These are unavoidable.

10.58 It is inevitable that the character and appearance of land on the edge of St Albans will change if the District's current and future development needs are to be met.

10.59 The visual envelope of the application site is limited and the change will be experienced by only a limited number of receptors; this effect is localised only.

Landscaping

10.60 The comprehensive landscape strategy intends for extensive new landscape features and habitat creation. Overall, the proposed landscape and habitat creation will result net gains that mitigate the associated change in character and appearance.

Ecology and biodiversity

10.61 The green infrastructure strategy provides a range of new habitat creation measures that compensate for the loss of habitat features. Other habitats and species are suitably mitigated. A net gain in biodiversity in excess of the minimum 10% can be achieved. New built development is suitably separated from the ancient woodland and Local Wildlife Site.

Drainage and flood risk

10.62 The application site is not subject to fluvial flood risk, although there are parts of the site where surface water flow paths exist. Modelling has identified that these routes can either be maintained or captured by positive drainage measures to ensure that the proposed houses are other more vulnerable development are not at risk of flooding. The surface water drainage strategy also ensures that there is no increase in flood risk off site.

10.63 The sequential test has not identified any genuine sequentially preferable sites at or adjacent to St Albans, that are otherwise considered suitable for development and would therefore be an appropriate alternative for the proposed development.

Above and below ground heritage

10.64 The likely presence of below ground archaeology has been assessed to be limited and can be mitigated by trial trenching secured as a planning condition. The application site is not within the setting of any designated heritage asset. In the event that the pedestrian and cycle improvements at the Ancient Britton junction require Scheduled Monument consent this would need to be secured from Historic England under legislation separate from the Town and Country Planning regime.

Impact on social and physical infrastructure

10.65 New local services and facilities are proposed as part of the development - a new primary school and early years provision, small scale retail, community facility, and healthcare - these correspond to those identified in the emerging Local Plan. Investment in existing playing pitches at Toulmin Drive is also proposed in lieu of on-site provision. Other planning obligations can be expected to be part of a Section 106 Agreement pursuant to Town and Country Planning Act 1990.

Public Rights of Way

10.66 The existing footpath will be retained and incorporated into the Scheme's green infrastructure. Where necessary, its surfacing can be improved to increase its utility. To expand the existing network of footpaths, it is proposed to provide a new route extending from Sandridgebury Lane to the Hertfordshire Way to allow access to the countryside beyond and Heartwood Forest. This corresponds to objectives in the Sandridge Neighbourhood Plan, the Public Rights of Way Improvement Plan and the emerging Local Plan's site specific requirement.

Agricultural land

10.67 The proposed development will result in the loss of agricultural land, including Grade 3a land which is categorised as Best and Most Versatile. This is a negative effect of the proposed development but the need for the development is considered to outweigh this. This is permissible under both the existing and emerging Local Plan.

The principle of development

10.68 The proposed development is in a wholly suitable location for new development. Whilst it is located within the Green Belt, very special circumstances are considered to exist, as they have done elsewhere in the District on a number of previous occasions.

- 10.69 The character and appearance of the application site will change as a result of the proposed development and there will be loss of agricultural land, but these effects are inevitable if the District's future development needs are to be met. The visual envelope of the application site is limited and the change will be experienced by only a limited number of receptors; this effect is localised only. The green infrastructure strategy includes new landscape planting and habitat creation will result net gains that mitigate the change in character and appearance.
- 10.70 The surface water drainage strategy also ensures that there is no increase in flood risk off site. The likely presence of below ground archaeology has been assessed to be limited and the proposed development will not have any effect on the setting of any designated heritage asset. To expand the existing network of footpaths, it is proposed to provide a new route that is a direct response to the Public Rights of Way Improvement Plan.
- 10.71 The many and varied housing components of the proposed development all respond to an identified need and represent a substantial benefit. New local services and facilities are proposed as part of the development and investment in existing playing pitches is also proposed in lieu of on-site provision. Investment in active travel measures within the site and to key destinations via Harpenden Road which is a priority corridor for such improvements, represent a wholly appropriate and necessary form of transport mitigation that will have wider benefits for healthy lifestyles both for future and existing residents. These are all outcomes that correspond to identified measures in the emerging Local Plan.
- 10.72 Every planning decision requires a balance to be struck between social, economic and environmental considerations. In this instance, the proposed development has been carefully conceived and strikes a wholly appropriate balance. Given the circumstances in the District, where there is an inescapable need to increase the supply of new housing, and that, notwithstanding the application site's Green Belt status, the environmental effects are limited, the balance leans firmly in favour of granting planning permission.

11 Conclusion

The development plan

- 11.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires a planning application to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 11.2 The St Albans City and District Local Plan was adopted in July 1994 and had an end date of 2001. It was prepared in the context of the then Hertfordshire Structure Plan and national planning policy as existed at that time. It is time expired and not “up to date”, although its policies continue to attract weight.
- 11.3 Because of its exceptionally aged nature, the Local Plan does not identify land to meet current and future development needs. As such, the fact the application site is not an identified site for development is of limited weight.
- 11.4 Despite its aged nature, there is high degree of conformity with the development plans’ policies.
- 11.5 Whilst the application site is within the Green Belt, inappropriate development is permissible where very special circumstances exist and if that situation is proven to exist here, as the applicant contends, the conflict with Policy 1 would fall away.
- 11.6 In terms of the spatial strategy, the development reinforces the settlement hierarchy and contributes to the intention that most new development is distributed in accordance with the hierarchy which has St Albans at its pinnacle.
- 11.7 In all other respects, it is evident that the proposed development accords with the Local Plan and Neighbourhood Plan’s development management policies to the extent that they are relevant to an outline planning application. In particular, the proposed development accords with Policy 7A, Policy 65, Policy 69, Policy 70, Policy 74, Policy 84, Policy 84A, Policy 91, Policy 96, Policy 97, Policy 102, Policy 106, and Policy 143B. In many aspects, the proposed development delivers benefits that contribute positive to the achievement of the underlying policy objectives.
- 11.8 The policies in the Waste Local Plan are most relevant to the construction stage and layout matters. The presence of some minerals resource is not considered to represent a reason to refuse planning permission.

National planning policy

- 11.9 The proposed development will contribute to many planning policy objectives of the NPPF and that, critically, its benefits are substantial and comply with a great many of the NPPF’s policies. This high degree of compliance with the NPPF is a material consideration that weighs heavily in favour of the grant of planning permission. In this instance, given the circumstance that exist in the District, the social and environmental objectives of sustainable development are particularly relevant.
- 11.10 It is evident that the proposed development will contribute to many planning policy objectives of the NPPF, including paragraphs 8, 60, 96, 103, 108, 109, 114, 115, 128, 135, 153, 154(b), 157, 165, 180, 186, and 218. Importantly, in this context, its benefits comply with a great many of the NPPF’s policies and are substantial.
- 11.11 As a residential led mixed-used development the proposal will provide a range of houses to meet the needs of the present and future generations whilst fostering a well-designed place taking advantage of its highly accessible location and providing substantial areas of open space that will support the community’s well-being. Investment in active travel measures between the site and key destinations will provide opportunity both for the future resident population and the existing population to capitalise on the compact nature of St Albans. By careful design, and with adherence to the development strategies that inform the detailed design that is to follow, the proposed development will achieve an efficient use of land and the provision of much needed housing within a framework of multifunctional green and blue infrastructure that will deliver a wide range of

natural environment benefits. Economic benefits also arise from the non-residential uses that are proposed.

- 11.12 Whilst the proposed development would, for the most part, constitute inappropriate development in the Green Belt, notwithstanding that great importance is afforded to this designation, very special circumstances exist that justifies the grant of planning permission in this instance.
- 11.13 Paragraph 11d of the NPPF guides the decision maker in the following terms: where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless:
- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 11.14 In this instance, because of the aged nature of the 1994 Local Plan, there are no policies that meet current and future development needs and counterpart policies that restrict new development are framed only by requirements that were germane many years ago. Moreover, by reference to footnote 8 the two measures set out there have been triggered for a number of years. For both these reasons, as a matter of principle the development plan must be considered out-of-date.
- 11.15 Whilst Green Belt is amongst the policy areas cited in footnote 7, the fact very special circumstances can be made out neuters the first limb. For this same reason, it follows that the adverse impacts of granting planning permission would not significant and demonstrably outweigh the benefits of the proposed development in limb 2.

The emerging Local Plan

- 11.16 North St Albans is identified has again been identified in the emerging Local Plan as one of its Broad Locations. The components of the proposed development are framed by Policies SP1, LG1 and the Part B requirements.
- 11.17 Whilst a Local Plan at this stage in the preparation process attracts less than full the weight of an up-to-date adopted Local Plan, it is instructive that the North St Albans proposal reflects that which was also included in the 2018 Local Plan. It is unmistakable that the District Council affords a degree of significance to this location as consistent with its spatial strategy and capable contributing to a sustainable pattern of development. It deems it acceptable to remove this land from the Green Belt without compromising its fundamental purpose Green Belt. The principle of new development is considered acceptable in landscape and heritage and flood risk terms and absent of any overriding constraints or unacceptable impacts.
- 11.18 The proposed development exhibits a high degree of compliance with other relevant policies. Whilst the emerging Local Plan does not attract full weight, it is notable that the proposed development generally accords with the following draft policies to the extent they are relevant to an outline planning application: Policy LG1, Policy BL1, Policy HOU1, Policy HOU2, Policy HOU3, Policy HOU4, Policy HOU5, Policy SP6, Policy SP7, Policy COM1, Policy SP8, Policy TRA1, Policy TRA4, Policy SP9, Policy SP10, Policy NEB1, Policy NEB5, Policy NEB6, Policy NEB9, Policy NEB10, Policy SP12, Policy DES12, Policy DES1, Policy DES3, Policy DES5, Policy DES6, Policy HW1, Policy HW2, Policy HW5, and Policy SP15.
- 11.19 In a small number of instances, most notably the open space typologies that have been accommodated, there is a difference between the proposed development and those policies. A planning balance will need to exercised accordingly. Having regard to the many benefits of the proposed development as opposed to those limited conflicts, as material considerations they support the proposed development. This is especially that case when the District Council has already granted planning permission for Sewell Park whose fundamental characteristics are indistinguishable from the Woollam Park.

Other material considerations

- 11.20 There is plainly an identified need to increase the supply of new housing in the District. This has arisen because of the aged nature of the 1994 Local Plan and the low levels of housing completions over many years relative to evidence of local housing need. The proposed development will make a notably important contribution to improving supply in the short term and providing surety of supply over the longer term. Allied to this social benefit are environmental and economic benefits.

Green Belt and very special circumstances

- 11.21 The proposed development is within the Green Belt. The Green Belt's boundaries are effectively those drawn in the 1994 Local Plan and are now some 30 years old. Whilst they have endured for that period of time, it is widely accepted that development of land currently within the Green Belt is inevitable if present and future development needs are to be met.
- 11.22 Importantly the development would not result in coalescence between St Albans and Harpenden, thus maintaining the separation between these two settlements and retaining the established spatial pattern. The proposed development would represent encroachment into the Green Belt but that is true of any such development and is inevitable if current and future development needs are to be met at St Albans; this circumstance militates the extent to which this is a decisive factor.
- 11.23 The openness of the application site would be lost, but its boundaries serve to contain development to such an extent that it would not represent sprawl and openness beyond the application site would be retained and the visual effect of the development is especially limited.
- 11.24 Policy 1 of the Local Plan and the NPPF permit new development in the Green Belt where very special circumstances exist. In a number of other instances, including Sewell Park, planning permission has been granted on this basis. The circumstances that supported those decisions - particularly the persistent paucity of housing land supply, low levels of housing delivery, acute levels of affordable housing need and exceptionally poor affordability - remain highly prevalent.
- 11.25 The proposed development will cause definitional harm by reason of inappropriateness; this is afforded *substantial negative weight*. In this location, the Green Belt's functions, which not insignificant are limited and importantly the development would not result in coalescence between St Albans and Harpenden, thus maintain the separation between these two settlements and retaining the established spatial pattern. The openness of the application site would plainly be lost, but its boundaries serve to contain development to such an extent that it would not represent sprawl and openness beyond the application site would be retained and the visual effect of the development is especially limited. The proposed development would represent encroachment into the Green Belt but that is true of any such development and is inevitable if current and future development needs are to be met at St Albans; this circumstance militates the extent to which this is a decisive factor. Nevertheless, this harm attracts **substantial negative weight**.
- 11.26 *Moderate negative weight* is afforded to the to harm to the character and appearance of the area again reflecting the application site's characteristics, the contained nature of the site and the presence of urban development and activity that frame the site. The loss of agricultural land also attracts *moderate negative weight*.
- 11.27 There is a persistent and acute housing shortage of housing in the District; affordability is especially striking as is the scale of affordable housing need. The proposed development would make a significant contribution towards addressing these needs in the form of market housing, affordable housing, self-build and custom housing, and specialist housing. This will contribute to meeting the need for housing in the short term and provide a surety of supply in the longer term. In these circumstances, the housing benefits attract **very substantial positive weight**.
- 11.28 The other benefits of the proposed development – its contribution to a sustainable pattern of development and investment in the delivery of the LCWIP priority corridor, new community facilities, a new recreation route to the Hertfordshire Way consistent with PROW improvement plan - are each of **moderate positive weight**. The overarching objective to achieve a net zero community attracts **substantial positive weight**. Similarly, the economic benefits are of a scale that attract **substantial positive weight**.

Planning assessment

- 11.29 The many and varied housing components of the proposed development all respond to an identified need and represent a substantial benefit. New local services and facilities are proposed as part of the development and investment in existing playing pitches is also proposed in lieu of on-site provision. Investment in active travel measures within the site and to key destinations via Harpenden Road which is a priority corridor for such improvements, represent a wholly appropriate and necessary form of transport mitigation that will have wider benefits for healthy lifestyles both for future and existing residents. These are all outcomes that correspond to identified measures in the emerging Local Plan.
- 11.30 Every planning decision requires a balance to be struck between social, economic and environmental considerations. In this instance, the proposed development has been carefully conceived and strikes a wholly appropriate balance. Given the circumstances in the District, where there is an inescapable need to increase the supply of new housing, and that, notwithstanding the application site's Green Belt status, the environmental effects are limited, the balance leans firmly in favour of granting planning permission.

Conclusion

- 11.31 For the reasons set out in this Planning Statement, and in the context of the District's failure to bring forward a new Local Plan to replace the 1994 plan and the status of the application site in successive versions of the emerging Local Plan, the notably important benefits that arise from the proposed development outweigh the harm to the Green Belt and other harm. Consequently, very special circumstances exist to justify the grant of planning permission.
- 11.32 Therefore, in the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004, having regard to both the development plan and material considerations, planning permission for the proposed development should be granted.

Appendix 1. Site location plan

Appendix 2. Schedule of planning application documents

Appendix 3. Parameter Plans

Appendix 4. Playing Field Scheme

Appendix 5. Access Drawings

Appendix 6. North St Albans Broad Location Key Development Requirements

Key Development Requirement		
1.	One extra-care facility comprising of 70-80 self-contained units, one 70-80 bed nursing home and 4 supported living units for people with disabilities (these units are included within the indicative dwellings figure).	The proposed development includes an 80-bed C2 care home; 4 supported living units for people with disabilities; and 80 for age restricted specialist accommodation for the elderly (this could either be provided as extra care accommodation as part of the scheme's affordable housing component or alternatively as retirement housing).
2.	A 2FE primary school, including Early Years provision, to serve the new and wider community. This should include provision of an all weather playing pitch available for community use	Land is identified for a primary school is a location agreed with the Local Education Authority. This land will be transferred to the Local Education Authority for them to construct the School. Whether the Primary School includes an all-weather pitch available for community use will be determined by them.
3.	A new local centre to provide local services, including Medical Centre and commercial development opportunities	The local centre is shown on the land use parameter plan and is intended to provide small-scale retail, community and [potentially] healthcare accommodation.
4.	Replacement of the displaced playing fields. The replacement playing fields must be an equivalent or better playing field in terms of quantity and quality and delivered prior to commencement of any development on the existing playing field. Sport England will be a statutory consultee on any future planning application that would affect the playing field within this site allocation	The existing playing fields are to be relocated to Longcroft and will represent this first phase of development.
5.	On-site outdoor sports provision to meet the additional needs generated by the development. An offsite facility may be acceptable where justified by evidence and subject to early delivery of the offsite provision prior to occupation of first homes	The applicants intend to make financial contributions to improve the existing playing pitches at Toulmin Drive. These are identified in the Playing Pitch Strategy as being of poor quality and in need of investment.
6.	Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.	A range of off pedestrian and cycle improvements have been identified and are explained in the Transport Statement. These reflect the priority corridor status afforded to Harpenden Road in the LCWIP.
7.	Support for a transport network (including walking and cycling links) and public transport services upgrades / improvements, including off-site improvements to Harpenden Road, Sandridgebury Lane, Valley Road, Ancient Briton junction and King William IV junction, links to St Albans City Centre, station and education; aligned to schemes in the GTPs and LCWIP.	The existing Tigermoth service can be extended into the site. Sandridgebury Lane can be re-routed within the development to enable the existing route to serve as a walking and cycling corridor. Additional walking and cycling routes are proposed within the development as shown on the access and movement plan. A range of off pedestrian and cycle improvements have been identified and are explained in the Transport

		Statement. These reflect the priority corridor status afforded to Harpenden Road in the LCWIP.
8.	Provide pedestrian and cycle links with the part of the site that is delivering 150 homes from planning permission 5/2021/0423.	The access and movement parameter plan identifies the location of pedestrian and cycle links to Sewell Park. With both developers providing unincumbered connections to their legal boundaries these connections can be formed.
9.	Support for the improvement of the Public Rights of Way network to enable active travel and recreational use to Heartwood Forest and Nomansland Common.	A route to extend the existing public right of way (footpath 96) north of Sandridgebury Lane to connect to the Hertfordshire Way enables active travel and recreational use at Heartwood Forest. Nomansland Common lies further north-east of Heartwood Forest.
10.	Development proposals must take appropriate account of the Ancient Woodland, County Wildlife Site, Priority Habitat and trees covered by Tree Preservation Order along the south-east boundary, and the Priority Habitat close to the eastern boundary comprising an area of deciduous woodland.	The land use parameter plan identifies the appropriate separation from Longspring Wood, an Ancient Monument and Local Wildlife Site. A management plan is proposed to preserve and enhance its important attributes.
11.	A noise assessment must be carried out regarding the railway line and appropriate mitigating measures provided as necessary.	Such as an assessment has been undertaken and forms part of the Environmental Statement. New housing is suitably located to ensure appropriate residential amenity.
12.	Take appropriate account of these Environmental Constraints: Source Protection Zone (SPZ) 3; Bedrock Aquifer; Superficial Aquifer.	The surface water drainage strategy includes measures to treat run-off to ensure pollution of the aquifer can be avoided

Appendix 7. Development requirements for Broad Locations

Key Development Requirement		
(a)	Demonstrate a coordinated, Masterplanned approach to development with appropriate input from the District and County Council, statutory consultees, local communities, landowners and other stakeholders; including Dacorum Borough Council for Hemel Garden Communities. The approach should be in accordance with the District's Strategic Sites Design Guidance	Extensive discussions of the North St Albans masterplan have occurred since 2019 and have more recently included pre-application discussions that have considered urban design matters and well as Design Review process. The Design and Access Statement records how the approach adopted has followed the Strategic Sites Design Guidance.
	Be undertaken in a coordinated way where there are different landowners	Both Sewell Park and the proposed development have been designed within the context of an overarching masterplan prepared collaboratively with the District Council.
	Demonstrate accordance with Local Plan policies and the requirements set out in Part B	For the most part the proposed development accords with the requirements of the emerging Local Plan's policies. Where there is a conflict it is in respect of open space typologies. The scheme is driven by the overarching Vision and design intent and has to be balance the various specific requirements of Part B and other policies. The composition of open space is therefore different to the standards sought in the emerging Local Plan. Playing pitches improvements are proposed off-site rather than on-site and this catered for in the site-specific policy. However, the allotment standard is not met and alternatively community growing spaces are proposed. If necessary, a financial contribution could be provided to the Council to compensate for this. Appendix 6 identifies how the proposed development accords with the site-specific requirements of Part B.
	Demonstrate excellence in design, energy efficiency and water management	The Sustainability Strategy details the measures proposed.
	Provide appropriate renewable energy production and supply mechanisms	
	Provide necessary transport, community, green, health and other infrastructure in a timely manner to support development	Various infrastructure elements are listed in the site-specific requirements and these form part of the proposed development. A planning obligation pursuant to Section 106 of the Town and Country Planning Act will be required in due course and this will govern timely provision.
	Demonstrate accordance with any relevant Supplementary Planning Document, Masterplan or Development Brief	The proposed development - as an outline planning application has taken account of relevant guidance, particularly the Strategic Sites Design Guidance.

	Provide 40% Affordable Housing in accordance with Local Plan policy	The proposed development intends to achieve this and the manner of provision will be determined in a S106 planning obligation.
	Provide 3% of the total number of homes as Self-build or Custom Housebuilding	The proposed development intends to achieve this and the manner of provision will be determined in a S106 planning obligation.
	Make efficient and effective use of the site, with a minimum overall net density of 40 dwellings per hectare; utilising a range of densities that take account of adjacent character, uses and identity	The density of the proposed development - at 48 dwellings per hectares - exceeds this and represent an effective use of land that respects the adjacent character, uses and identity.
	Provide housing size, type and mix as set out in Local Plan Policy; proposals will also have regard to the most up-to-date evidence on housing need including the Council's latest evidence base	The proposed development intends to achieve this and the manner of provision will be determined in a S106 planning obligation.
	Demonstrate how the proposal integrates with and where appropriate seeks to improve the existing transport network with reference to the LCWIP. Proposals should include excellent walking and cycling links, including accessible routes and public transport services upgrades / improvements	<p>The existing Tigermoth service can be extended into the site.</p> <p>Sandridgebury Lane can be re-routed within the development to enable the existing route to serve as a walking and cycling corridor. Additional walking and cycling routes are proposed within the development as shown on the access and movement plan.</p> <p>A range of off pedestrian and cycle improvements have been identified and are explained in the Transport Statement. These reflect the priority corridor status afforded to Harpenden Road in the LCWIP.</p>
	Normally retain significant healthy trees and other important landscape features	Wherever possible important trees and hedgerows have been retained. Compensation measures are part of the green infrastructure strategy.
	Plant at least 1 semi-mature tree for each dwelling; for C2 accommodation plant 1 semi-mature tree for every 2.5 dwelling equivalent bed spaces	The green infrastructure has to balance a range of factors but includes extensive areas of new habitat creation and tree planting.
	Provide new or provide contributions to enhance existing strategic, sports facilities, local and recreational public open space, including managed woodland and ecological network links	A comprehensive green infrastructure strategy is proposed which is focused on habitat creation, recreational space and natural play alongside the retention of existing landscape features. The applicants intend to make financial contributions to improve the existing playing pitches at Toulmin Drive. These are identified in the Playing Pitch Strategy as being of poor quality and in need of investment.
	Positively relate and integrate the development to the surrounding buildings and landscape, and be informed by a comprehensive Landscape and Visual Impact Assessment which addresses the	Such as an assessment has been undertaken and forms part of the Environmental Statement. The landscape and visual impact of the proposed development is limited.

	recommendations of the Council's Landscape and Visual Appraisal 2024	
	For sites listed in Appendix 5, be informed by a detailed Heritage Impact Assessment and Archaeological Desk-Based Assessment which address the recommendations of the Council's Heritage Impact Assessment 2024	North St Albans is not listed in Appendix 5.
	Ensure that land use, density, landscaping and form have regard to the topography of the site and identified landscape impacts	The existing undulating landform has a number of effects which have been comprehensively assessed and the proposed development takes account of these.
	Establish an appropriate Community Stewardship and Legacy body with sufficient assets to provide long term sustainable management of community facilities and / or open spaces;	The accompanying [Governance and Stewardship] principles exhibit the applicants' commitment to ensure long term and sustainable management of community facilities. This will form part of a planning obligation in due course.
	Have due regard to any relevant Neighbourhood plan(s)	Part of the application site is subject to policies in the in the Sandridge Neighbourhood Plan. No conflict with the Neighbourhood Plan has been identified and the proposed development contributes to its aspirations to improve the pedestrian network.
	Demonstrate the co-location of community facilities (such as schools, shops, community centres, strategic public open space) in order to reduce the number of trips that residents have to make and encourage the use of active travel modes; and	The proposed development both includes community facilities at the local centre that enable an internalisation of trips but it also located close to other existing facilities that can be accessed by sustainable modes of travel.
	Normally provide contributions towards the maintenance and / or upgrade of an existing community hall or village hall nearby, which is secured by appropriate mechanism such as a S106 agreement.	The provision of a community facility is intended at the local centre to reflect the site-specific policy.

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