



© DLA ARCHITECTURE LIMITED 2021

The copyright of this document is owned by DLA ARCHITECTURE LIMITED.

No part of this brochure/document or any designs contained within may be reproduced, stored in a retrieval system, or transmitted in any form or by any means electronic, mechanical, photocopying, recording or otherwise without permission in writing from DLA ARCHITECTURE LIMITED.

All reasonable effort has been made to ensure that this colour print matches the original artwork, but due to the limitations of the colour copy process it may not be truly representative.

Google Earth image used under DLA 'Google Earth Pro Licence' ©Google 2021

Brochure Designed, Produced and Printed by DLA ARCHITECTURE LIMITED.

Offices at :

55
St Pauls Street
LEEDS
LS1 2TE

☎ 0113 887 3100

1 Naoraji Street
Clerkenwell
LONDON
WC1X 0GB

☎ 0207 553 3030

86
King Street
MANCHESTER
M2 4WQ

☎ 0161 834 4550

www.dla-architecture.co.uk

25 January to 5pm 8 March 2021
'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

Please do not submit sites that:

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

By online consultation portal:

<http://stalbans-consult.limehouse.co.uk/portal/>

By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

Your Details	
Name	██████████
Company/Organisation	Strutt and Parker
Address	66-68 Hills Road, Cambridge
Postcode	CB2 1LA
Telephone	██████████
Email	██
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details					
Requirements: <ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 					
Site address/location (Please provide a map showing the site boundary)	Land at Orchard Garage, Woodcock Hill, Sandridge				
Site area (in hectares)	2				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table>	Easting		Northing	
Easting		Northing			
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	D'Arblay Investments Limited c/o Strutt & Parker				
Current land use	Garage Site				
Condition of current use (e.g. vacant, derelict)	Garage Site				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	Please see accompanying supporting statement.				

Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years
---	--

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Environmental issues (e.g. Tree Preservation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Topography affecting site (land levels, slopes, ground conditions)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input checked="" type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input checked="" type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history) Two applications refused and one withdrawn.	
Other comments	Please see accompanying supporting statement.	



Ordnance Survey © Crown Copyright 2019. All Rights Reserved. Licence number 100022432

Cambridge office

Strutt & Parker
66-68 Hills Road
Cambridge
CB2 1LA
Telephone 01223 459500

Cambridge@struttandparker.com
struttandparker.com



Planning Policy
St Albans City & District Council
St Albans Council Offices
St Peters Street
St Albans
Hertfordshire
AL1 3JE

Direct Dial: 01223 459433

Email: [REDACTED]

Our Ref: [REDACTED]

8th March 2021

BY EMAIL: planning.policy@stalbans.gov.uk

Dear Sir or Madam

Re: St Albans City & District Local Plan 2020-2038: “Call for Sites” – Land at Orchard Garage, East of Woodcock Hill, Sandridge

Strutt & Parker are instructed by D’Arblay Investments Limited, in relation to St Albans City & District’s Local Plan 2020 – 2038 Call for Sites. This letter should be considered in conjunction with the accompanying information:

1. Site Location Plan – Strutt & Parker; and
2. Completed Call for Sites form.

The site extends to approximately 2 hectares of land and is being promoted by a single landowner, as a residential use development site, including market and affordable housing.

This letter provides an overview and analysis in terms of identified housing need, having regard to the National Planning Policy Framework 2019 (NPPF) and the need for the inclusion of a significant number of additional site allocations for the future new Local Plan to successfully meet the tests of soundness. It sets out the details of the site being proposed as an allocation, how it can be considered to represent sustainable development, its suitability for release from the Green Belt and its deliverability.

Background

The previously prepared new Local Plan 2020-2036 was submitted for Examination on 29th March 2019. Following the stage 1 hearing sessions held in January 2020, the Local Plan Inspectors wrote to the Council on 27th January 2020 raising serious concerns in respect of the legal compliance and soundness of the Plan and cancelled subsequent hearing sessions. This was then followed by further correspondence between the Inspectors and the Council, including the Inspectors’ letters of 14th April 2020 and 1st September 2020. The Council subsequently withdrew the Plan and have now commenced work on a new Local Plan 2020 – 2038.

Whilst the Inspectors had fundamental concerns in respect of the duty to cooperate, a factor which cannot be remedied once a plan has been submitted for examination, they also raised a number of other serious concerns in relation to Green Belt release and the Plan's ability to meet the area's objectively assessed needs.

A key issue was the Plan's reliance on a small number of large strategic allocations (500 dwellings or more, or over 14 ha) at the expense of smaller scale subareas identified in the Green Belt study (GB 004) and the contention that the small scale subareas identified in the study were not necessarily exhaustive and had not been properly assessed. Parallel concerns were also raised in respect of this approach in respect of the sustainability appraisal. In short, it was suggested that there may be considerable potential for small-scale boundary changes which would not necessarily compromise the overall function of the Green Belt and may represent a more sustainable option, available to meet the Council's housing need, by bringing forward smaller scale sites.

The Inspectors then went on to note that a range of sites, including smaller sites, can provide benefits, in that they can be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately. They also referred to paragraph 68 of the NPPF which indicates that, small and medium-sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.

The Inspectors also raised the matter of compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, as set out in paragraph 138 of the NPPF, and whether the plan had identified such compensatory improvements or would in fact be able to deliver any.

Finally, in respect of altering Green Belt boundaries, the Inspectors reminded the local authority that the Courts have found that the 'exceptional circumstances' test for altering Green Belt boundaries through plan making is less demanding than the 'very special circumstances' development control test, for permitting inappropriate development in the Green Belt. Essentially, the time for amending Green Belt boundaries is through the preparation or updating of plans.

In respect of the Inspectors concerns about the Plans overreliance on large strategic allocations, it is worth noting that the Council are not alone in failing to convince an Inspector of the soundness of such an approach. Whilst not directly comparable given the limited extent of the Green Belt, the findings of the Inspector in 2020, in respect of the examination of the Uttlesford Local Plan were similar. In that particular case, the Inspector considered it was highly ambitious to rely on three new Garden communities (Easton Park, North Uttlesford and West of Braintree) and not include a wider range of small and medium sized sites as advocated by paragraph 68 of the NPPF.

The New Local Plan 2020-2038

The new Local Plan will provide the basis for meeting the land-use needs of the District up to 2038 in accordance with the Government's economic, environmental and social priorities set out in the NPPF. At paragraph 11 the NPPF establishes a '*presumption in favour of sustainable development*' which means that: '*plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexibility to adapt to rapid change.*'

Paragraph 59 confirms the Government's objective to '*boost significantly the supply of housing*' and the importance which it places on a sufficient amount and variety of land coming forward where it is needed. The NPPF requires

local authorities to identify and update annually a supply of specific deliverable sites, sufficient to provide five years' worth of housing. In addition, the NPPF also requires local authorities to meet the recently introduced Housing Delivery Test. According to the most recently published monitoring report (2020), the Council can only demonstrate a 2.4 year housing land supply. In addition, the latest Housing Delivery Test results for 2020, show a delivery over the last three years of only 63%, triggering the presumption in favour of sustainable development. Clearly, the District is not complying with the Government's objective to boost its housing supply significantly and this shortage of housing supply and delivery must be considered a critical issue for the District. Such a shortage of housing will make it extremely difficult for the District to maintain its economic competitiveness and will also perpetuate a social imbalance through the lack of both market and affordable housing.

It will be essential that the new Local Plan rectifies this situation immediately. These are tough challenges, especially given the plan preparation timetable. The most obvious strategy will be for an ambitious release from the Green Belt of a sufficient number of deliverable (emphasis added) small and medium-sized sites.

The Council have now started work on the preparation of a new Local Plan 2020 – 2038 which it hopes to have adopted by the Government target of December 2023 when all local planning authorities are expected to have up-to-date local plans in place. This is an ambitious timetable for the Council given the extent of additional evidence work that will have to be undertaken to remedy the shortcomings identified by the Planning Inspectors in respect of the previous Plan. Council officers have indicated that this will be a new Plan and they are starting with a blank sheet of paper. Accordingly, it is critical that the assessment of sites submitted through this Call for Sites process is a robust process. In particular, that a fair and balanced appraisal of their performance in terms of the functions of the Green Belt is undertaken at a site specific level. Such an assessment should also take into account the site's ability to deliver compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, as set out in paragraph 138 of the NPPF. Such compensatory improvements are even more relevant today given the need to deliver biodiversity net gains and that the Council declared a Climate Emergency in July 2019 and has pledged to make the District Carbon Neutral by 2030. The opportunity to identify sites for carbon offsetting through this Local Plan will be essential to help meet these challenges.

The new Local Plan will need to identify sites to deliver over 15,000 new homes to meet the Council's housing needs. Whilst it is possible that some 5,000 new homes may be found on urban sites it seems inevitable that Green Belt release will be required to accommodate approximately 10,000 homes. To maintain their housing trajectory, the Council will need to identify a range of sites, so that a housing delivery rate in excess of 900 homes per year can be maintained. In recent years, such a level of delivery has not been achieved. This delivery step change is essential for the social, economic and environmental prosperity of the District. Simply put, without the allocation of sufficient deliverable sites the Council will not be able to realise the corporate objectives it has set itself and most fundamentally make the District Carbon Neutral by 2030.

It is therefore essential that that the assessment of sites submitted through the Call for Sites process is undertaken in a positive and aspirational manner (NPPF para 16) and in accordance with NPPF paragraph 68 allows the identification of a sufficient level of deliverable and developable sites with sufficient flexibility to react to market trends and economic changes. The Green Belt constraints to the current delivery of housing should not be underestimated. It will be incredibly important for the local planning authority to release sufficient Green Belt land in sustainable locations, to ensure that this version of the Local Plan delivers the necessary housing to meet the District's need, over an albeit short plan period.



It is recognised that the Council are also working with their neighbours to produce the South West Herts joint strategic plan which will cover the plan period 2036 to 2050. Importantly, given the Inspectors comments in relation to infrastructure requirements, and in particular highway capacity issues around the previously proposed strategic developments, it is recommended that this would be the most appropriate vehicle to deliver properly planned strategic scale developments which can be fully supported with the necessary deliverable infrastructure, again planned at a strategic level.

Accordingly, the correct strategy for the emerging Local Plan 2020 – 2038 will be to reduce the reliance on strategic scale developments and instead include a significant and extensive range of small and medium-size sites. These can be deliverable in the first five years of the plan period or developable thereafter allowing sufficient lead time for more strategic sites to be properly planned and brought forward through the joint strategic plan with the necessary associated infrastructure.

Green Belt

In the Green Belt Review Purposes Assessment undertaken in November 2013 the site fell within land parcel GB36. While the strategic sub-areas were reviewed in more detail in the Green Belt report February 2014 which looked at the urban fringe of this parcel around St Albans, it does not appear that the sub-area around the south of Sandridge was given any further detailed consideration.

The reports' assessment of parcel GB36 concluded that in terms of principal function of the Green Belt the parcel made a significant contribution towards preventing St Albans and Hatfield from merging, safeguarding the countryside and maintaining the existing settlement pattern. Overall it was considered that the parcel contributed significantly towards three of the five Green Belt purposes.

It is our view that a more detailed assessment needs to be undertaken at a site specific level. This is particularly important in relation to this site as its development will provide the opportunity to strengthen the settlement edge without resulting in any significant harm to the overall function of the remaining Green Belt in this particular location.

When considered against the five purposes of the Green Belt set out at paragraph 134 of the NPPF, the site is not considered to make any significant contribution to the fundamental aim of Green Belt policy, which is to prevent urban sprawl, by keeping land permanently open. In fact, the site has been previously developed and contains existing buildings and as such does not have an open character. The key purpose of parcel GB36 is to prevent St Albans and Hatfield to the East from merging. To a lesser extent it is also relevant that a gap is retained between St Albans and Sandridge to the north, which for the reasons set out in more detail below, the allocation of this particular site would not compromise. Considered on its own merits, the site would make a logical extension of the settlement, and the land could be used much more efficiently, providing a more logical and defensible boundary to Sandridge, enhancing the landscape setting of the settlement and making a more efficient use of a brownfield site. These visual benefits, along with the delivery of market and affordable housing to meet the District's acute housing shortage, would demonstrably outweigh any limited harm associated with the loss of a small parcel of underutilised brownfield land from the Green Belt.

Call for Sites Submission

The site at Orchard Garage comprises approximately 2 hectares of brownfield land, immediately east of Woodcock Hill. Located in a sustainable location, the site lies on the eastern edge of Sandridge, 4 kilometres north-east of St Albans Town Centre, 5.3 kilometres north west of Hatfield. Situated between St Albans and Hatfield, the site is well connected, with St Albans being located on the Midland Main Line, and Hatfield on the Great Northern Line and Thameslink Line.

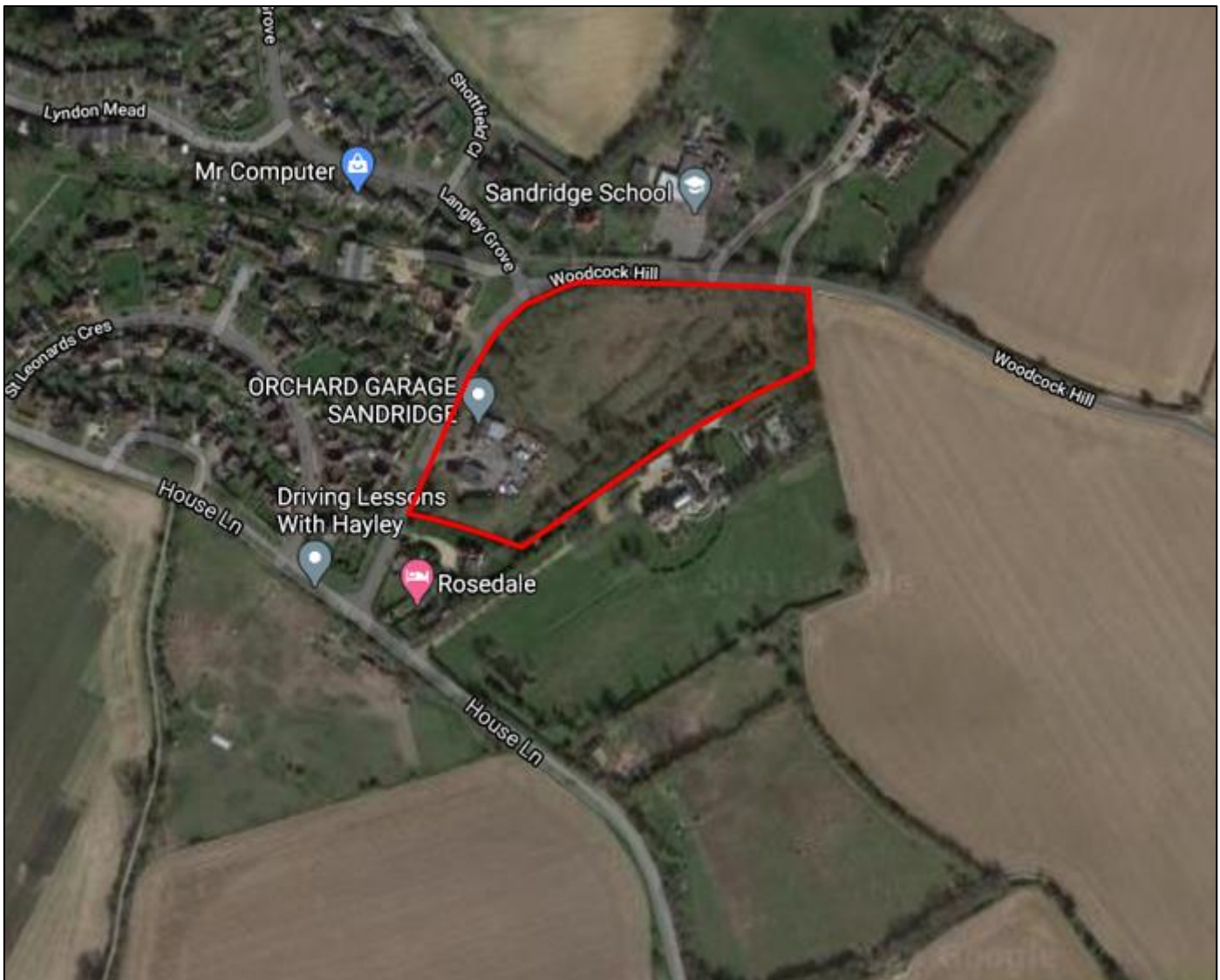


Figure 1: Site Location and Context

The village of Sandridge, is situated within the Green Belt, but unlike a considerable amount of the village, the site at Woodcock Hill does not fall within the Conservation Area. At present, the majority of the site comprises derelict underutilised scrub land, with Orchard Garage located in the southern area. Bordering the site to the north is Sandridge Primary School, Orchard Cottage lies to the south, and there is a substantial house and grounds to the east, and the western side of Woodcock Hill is characterised by two storey semi-detached dwellings. The site

benefits from significant natural screening, with established trees and hedgerows running along all borders. Effectively, as can be seen from Figure 1 above, the site is enclosed by development on all sides and clearly forms part of the settlement with only the eastern tip connecting to the countryside.

Approaching the settlement along Woodcock Hill there is a clear perception that you are entering the village at the point where the north-eastern corner of the site meets the lane. The sense of the edge of the settlement is reinforced by school signage, the 30 mph speed limit, utilities boxes and the entrance to a substantial residential property on the northern side of the lane. Conversely, approaching the settlement along House Lane there is no sense of the site, only the existing dwellings fronting onto House Lane which it lies behind. Accordingly, development of this particular site would have absolutely no impact on the openness of the Green Belt as the site is already assimilated within the settlement.

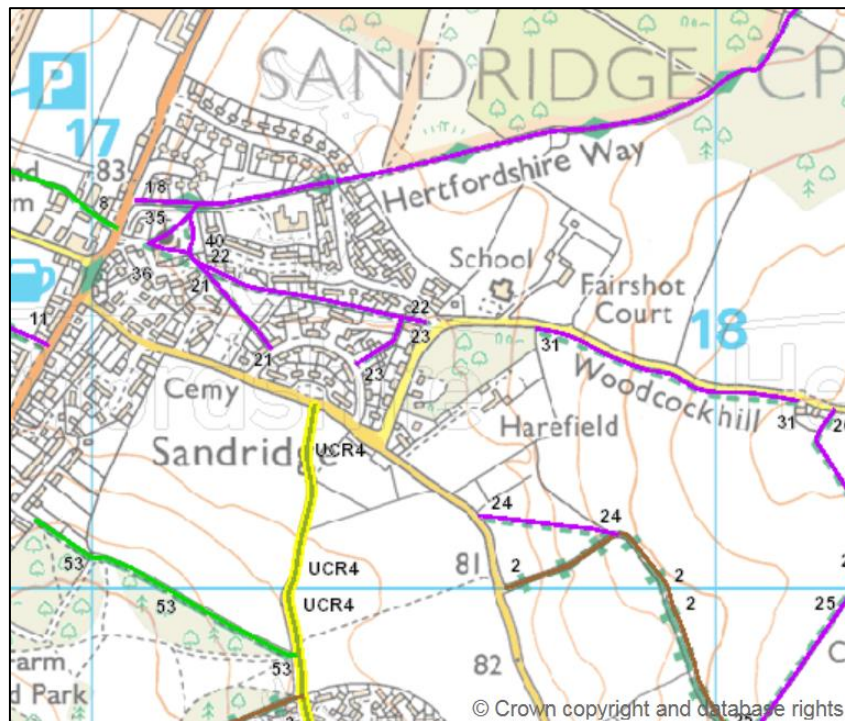


Figure 2: Hertfordshire County Council Rights of Way Map

As can be seen from Figure 2 above, Sandridge is well served by the public rights of way network, adding to its sustainability credentials. Path UCR4 provides a direct walking route to the north of St Albans, there are also a number of paths to Heartwood Forest which lies to the north of the settlement, providing a range of attractive circular leisure routes. Footpath 31, Woodcock Hill, finishes at the north-eastern edge of the site. This footpath connection could be extended into the site and around its frontage improving the pedestrian connectivity between the settlement and the countryside and also enhancing pedestrian safety around the school.

Aside from the Green Belt designation, the site is constraint free. It is located in Flood Zone 1 and at low risk from surface water flooding. It is not subject to any statutory designations.

Situated in a village, and in close proximity to both St Albans and Hatfield, the site benefits from convenient access to services and facilities. Within the village there is a primary school, a church, bars and additional local amenities



all in easy walking distance. Additionally, just 0.25 kilometres from the site is the Lyndon Mead bus stop for the 305 bus route, running a regular 6 days a week service between St Albans and Potters Bar.

As a brownfield site, it represents a relatively small, previously developed site, able to contribute to the housing supply. The inclusion of brownfield sites in housing allocations is supported in national guidance, with paragraph 137 of the NPPF advising that local planning authorities should “*make as much use as possible of suitable brownfield sites and underutilised land*” and paragraph 138 stating “*...plans should give first consideration to land that has been previously developed...*”. Such sites need to be exhausted before it can be concluded that exceptional circumstances exist to justify changes to Green Belt boundaries which allow the release of Greenfield sites. At a size of 2 hectares, assuming a density of 30 dph, the land could comfortably deliver up to 60 dwellings.

The site is in a single land ownership and available for development. There has been positive developer interest in the site and it therefore has the potential to come forward for development in a relatively short time period. Allocation of this site and its subsequent development could bring significant positive social, economic and environmental benefits. It could deliver a proportionate number of both market and affordable houses for a settlement the size of Sandridge to help meet the Council’s acute housing needs in a sustainable location, close to St Albans, the District’s largest settlement and a focus for growth in the new Local Plan. It would have no impact on the function of the Green Belt to the south of the village.

It is therefore concluded that through the Council’s new Housing Economic Land Availability Assessment (HELAA) the site must be identified as suitable and deliverable, and as such can make a positive contribution towards meeting the Council’s acute housing needs.

Summary

The recent withdrawal of the draft Local Plan identifies the importance of ensuring residential allocations comprise a range of site sizes and locations. The site at Woodcock Hill, is an underutilised brownfield site, constraint free, immediately adjacent to an urban area and capable of delivering a small / medium sized residential development.

The site is deliverable and in a sustainable location and its allocation would not cause any harm to the openness of the Green Belt or encourage the coalescence of Sandridge with nearby St Albans. When the site is considered against the five purposes of the Green Belt, demonstrably it makes no contribution to the fundamental purposes of the Green Belt. It is extremely well suited to be one of a range and variety of allocations in the new Local Plan contributing to the market and affordable housing supply in the District. It is in a sustainable location where if developed future residents would be in walking distance of the existing services and facilities available in the village of Sandridge.

Paragraph 137 of the NPPF requires local planning authorities to fully examine all reasonable options for meeting housing need before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. It is inevitable that Green Belt boundaries will need to be amended to deliver the 10,000 new homes necessary to meet the District’s acute housing shortage. However, the use of existing brownfield sites and underutilised land must take priority over the release of Green Field sites. The visual benefits along with the delivery of market and affordable housing to meet the District’s acute housing shortage demonstrably outweigh any limited harm associated with the loss of this small parcel of underutilised brownfield land from the Green Belt. It is therefore considered that the site the subject of this call for sites submission should be allocated in the new Local Plan.



Should you have any questions about this submission or like to discuss it, or the site in more detail, please do not hesitate to contact me. The landowners would be happy to provide further information to assist with deliverability and work with the Council to produce a detailed development brief for the site.

Yours faithfully



Strutt & Parker

Encs.

25 January to 5pm 8 March 2021
'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

Please do not submit sites that:

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

By online consultation portal:

<http://stalbans-consult.limehouse.co.uk/portal/>

By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

Your Details	
Name	██████████
Company/Organisation	Strutt and Parker
Address	66-68 Hills Road, Cambridge
Postcode	CB2 1LA
Telephone	██████████
Email	██
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

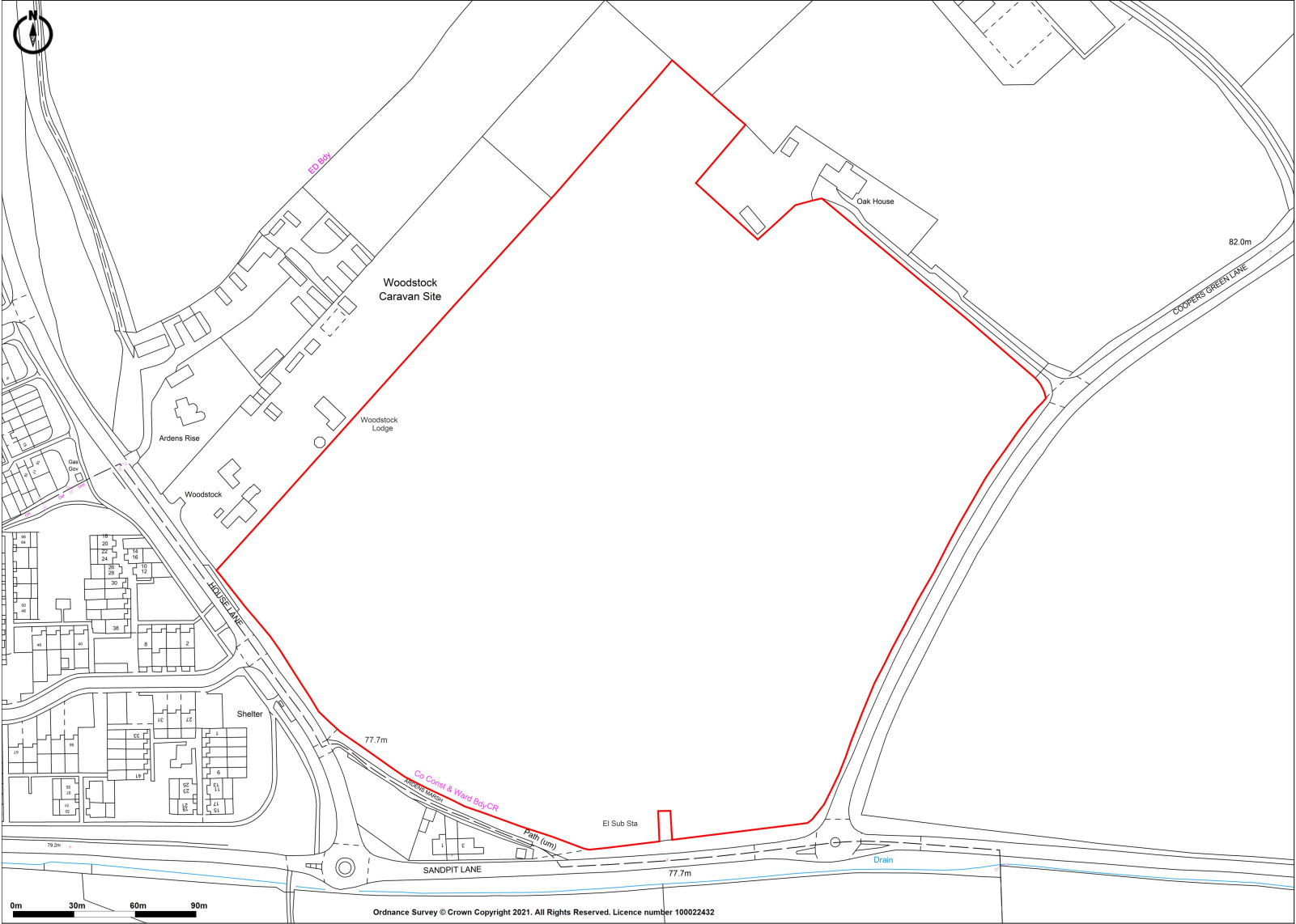
Site Details			
Requirements:			
<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 			
Site address/location (Please provide a map showing the site boundary)	Sandpit Lane, St Albans (see attached site location plan)		
Site area (in hectares)	9.0		
Coordinates	Easting		Northing
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Landownership (please include contact details if known)	D'Arblay Investments Limited c/o Strutt & Parker		
Current land use	Agricultural		
Condition of current use (e.g. vacant, derelict)	Vacant green field site.		
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input checked="" type="checkbox"/> Biodiversity Improvement / Offsetting <input checked="" type="checkbox"/> Green Belt Compensatory Land <input checked="" type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)		
Reasons for suggested development / land use	Please see attached supporting statement		

Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years
---	--

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Preservation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Topography affecting site (land levels, slopes, ground conditions)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input checked="" type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other	
Other comments	Please see attached supporting statement for full details.	
Please include details of the above choice below (for example planning reference numbers and site history)		

Land at Sandpit Lane, St Albans



Cambridge office

Strutt & Parker
66-68 Hills Road
Cambridge
CB2 1LA
Telephone 01223 459500

Cambridge@struttandparker.com
struttandparker.com



Planning Policy
St Albans City & District Council
St Albans Council Offices
St Peters Street
St Albans
Hertfordshire
AL1 3JE

Direct Dial: 01223 459433

Email: [REDACTED]

Our Ref: DF/215227

8th March 2021

BY EMAIL: planning.policy@stalbans.gov.uk

Dear Sir or Madam

Re: St Albans City & District Local Plan 2020-2038: “Call for Sites” – Land at Sandpit Lane, St Albans

Strutt & Parker are instructed by D’Arbly Investments Limited, in relation to St Albans City & District’s Local Plan 2020 - 2038 Call for Sites. This letter should be considered in conjunction with the accompanying information:

1. Site Location Plan – Strutt & Parker; and
2. Completed Call for Sites form.

9 hectares of land is being promoted by a single landowner, as residential use development site, including for market and affordable housing. It is also proposed to provide a significant area of the site as public open space and compensatory environmental improvements to the Green Belt.

This letter provides an overview and analysis in terms of identified housing need, having regard to the National Planning Policy Framework 2019 (NPPF) and the need for the inclusion of a significant number of additional site allocations for the future new Local Plan to successfully meet the tests of soundness. It sets out the details of the site being proposed as an allocation, how it can be considered to represent sustainable development, its suitability for release from the Green Belt and its deliverability.

Background

The previously prepared new Local Plan 2020-2036 was submitted for Examination on 29th March 2019. Following the stage 1 hearing sessions held in January 2020, the Local Plan Inspectors wrote to the Council on 27th January 2020 raising serious concerns in respect of the legal compliance and soundness of the Plan and cancelled subsequent hearing sessions. This was then followed by further correspondence between the Inspectors and the Council, including the Inspectors’ letters of 14th April 2020 and 1st September 2020. The Council subsequently withdrew the Plan and have now commenced work on a new Local Plan 2020 – 2038.

Whilst the Inspectors had fundamental concerns in respect of the duty to cooperate, a factor which cannot be remedied once a plan has been submitted for examination, they also raised a number of other serious concerns in relation to Green Belt release and the Plan’s ability to meet the area’s objectively assessed needs.



A key issue was the Plan's reliance on a small number of large strategic allocations (500 dwellings or more, or over 14 ha) at the expense of smaller scale subareas identified in the Green Belt study (GB 004) and the contention that the small scale subareas identified in the study were not necessarily exhaustive and had not been properly assessed. Parallel concerns were also raised in respect of this approach in respect of the sustainability appraisal. In short, it was suggested that there may be considerable potential for small-scale boundary changes which would not necessarily compromise the overall function of the Green Belt and may represent a more sustainable option, available to meet the Council's housing need, by bringing forward smaller scale sites.

The Inspectors then went on to note that a range of sites, including smaller sites, can provide benefits, in that they can be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately. They also referred to paragraph 68 of the NPPF which indicates that, small and medium-sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.

The Inspectors also raised the matter of compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, as set out in paragraph 138 of the NPPF, and whether the Plan had identified such compensatory improvements or would in fact be able to deliver any.

Finally, in respect of altering Green Belt boundaries, the Inspectors reminded the local authority that the Courts have found that the 'exceptional circumstances' test for altering Green Belt boundaries through plan making is less demanding than the 'very special circumstances' development control test, for permitting inappropriate development in the Green Belt. Essentially, the time for amending Green Belt boundaries is through the preparation or updating of Plans.

In respect of the Inspectors concerns about the Plan's overreliance on large strategic allocations, it is worth noting that the Council are not alone in failing to convince an Inspector of the soundness of such an approach. Whilst not directly comparable given the limited extent of the Green Belt, the findings of the Inspector in 2020, in respect of the examination of the Uttlesford Local Plan were similar. In that particular case, the Inspector considered it was highly ambitious to rely on three new Garden communities (Easton Park, North Uttlesford and West of Braintree) and not include a wider range of small and medium sized sites as advocated by paragraph 68 of the NPPF.

The New Local Plan 2020-2038

The new Local Plan will provide the basis for meeting the land-use needs of the District up to 2038 in accordance with the Government's economic, environmental and social priorities set out in the NPPF. At paragraph 11 the NPPF establishes a '*presumption in favour of sustainable development*' which means that: '*plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexibility to adapt to rapid change.*'

Paragraph 59 confirms the Government's objective to '*boost significantly the supply of housing*' and the importance which it places on a sufficient amount and variety of land coming forward where it is needed. The NPPF requires local authorities to identify and update annually a supply of specific deliverable sites, sufficient to provide five years' worth of housing. In addition, the NPPF also requires local authorities to meet the recently introduced Housing Delivery Test. According to the most recently published monitoring report (2020), the Council can only demonstrate

a 2.4 year housing land supply. In addition, the latest Housing Delivery Test results for 2020, show a delivery over the last three years of only 63%, triggering the presumption in favour of sustainable development. Clearly, the District is not complying with the Government's objective to boost its housing supply significantly and this shortage of housing supply and delivery must be considered a critical issue for the District. Such a shortage of housing will make it extremely difficult for the District to maintain its economic competitiveness and will also perpetuate a social imbalance through the lack of both market and affordable housing.

It will be essential that the new Local Plan rectifies this situation immediately. These are tough challenges, especially given the plan preparation timetable. The most obvious strategy will be for an ambitious release from the Green Belt of a sufficient number of deliverable (emphasis added) small and medium-sized sites.

The Council have now started work on the preparation of a new Local Plan 2020 – 2038 which it hopes to have adopted by the Government target of December 2023 when all local planning authorities are expected to have up-to-date local plans in place. This is an ambitious timetable for the Council given the extent of additional evidence work that will have to be undertaken to remedy the shortcomings identified by the Planning Inspectors in respect of the previous Plan. Council officers have indicated that this will be a new plan and they are starting with a blank sheet of paper. Accordingly, it is critical that the assessment of sites submitted through this Call for Sites process is a robust process. In particular, that a fair and balanced appraisal of their performance in terms of the functions of the Green Belt is undertaken at a site specific level. Such an assessment should also take into account the site's ability to deliver compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, as set out in paragraph 138 of the NPPF. Such compensatory improvements are even more relevant today given need to deliver biodiversity net gains and that the Council declared a Climate \emergency in July 2019 and has pledged to make the District carbon neutral by 2030. The opportunity to identify sites for carbon offsetting through this Local Plan will be essential to help meet these challenges.

The new Local Plan will need to identify sites to deliver over 15,000 new homes to meet the Council's housing needs. Whilst it is possible that some 5,000 new homes may be found on urban sites it seems inevitable that Green Belt release will be required to accommodate approximately 10,000 homes. To maintain their housing trajectory, the Council will need to identify a range of sites, so that a housing delivery rate in excess of 900 homes per year can be maintained. In recent years, such a level of delivery has not been achieved. This delivery step change is essential for the social, economic and environmental prosperity of the District. Simply put, without the allocation of sufficient deliverable sites, the Council will not be able to realise the corporate objectives it has set itself and most fundamentally make the District Carbon neutral by 2030.

It is therefore essential that that the assessment of sites submitted through the Call for Sites process is undertaken in a positive and aspirational manner (NPPF para 16) and in accordance with NPPF paragraph 68 allows the identification of a sufficient level of deliverable and developable sites with sufficient flexibility to react to market trends and economic changes. The Green Belt constraints to the current delivery of housing should not be underestimated. It will be incredibly important for the local planning authority to release sufficient Green Belt land in sustainable locations, to ensure that this version of the Local Plan delivers the necessary housing to meet the District's need, over an albeit short plan period.

It is recognised that the Council are also working with their neighbours to produce the South West Herts joint strategic plan which will cover the plan period 2036 to 2050. Importantly, given the Inspectors comments in relation to infrastructure requirements, and in particular highway capacity issues around the previously proposed strategic

developments, it is recommended that this would be the most appropriate vehicle to deliver properly planned strategic scale developments which can be fully supported with the necessary deliverable infrastructure, again planned at a strategic level.

Accordingly, the correct strategy for the emerging Local Plan 2020 – 2038 will be to reduce the reliance on strategic scale developments and instead include a significant and extensive range of small and medium-size sites. These can be deliverable in the first five years of the plan period or developable thereafter allowing sufficient lead time for more strategic sites to be properly planned and brought forward through the joint strategic plan with the necessary associated infrastructure.

Green Belt

In the Green Belt Review Purposes Assessment undertaken in November 2013 the site fell within land parcel GB36. It is important to note that in respect of the assessment of land contributing least towards the purposes of the Green Belt the site lies just to the north of the site SA-S3 East of St Albans, (a proposed allocation in the withdrawn Local Plan), as shown on Figure 8.1 reproduced below.

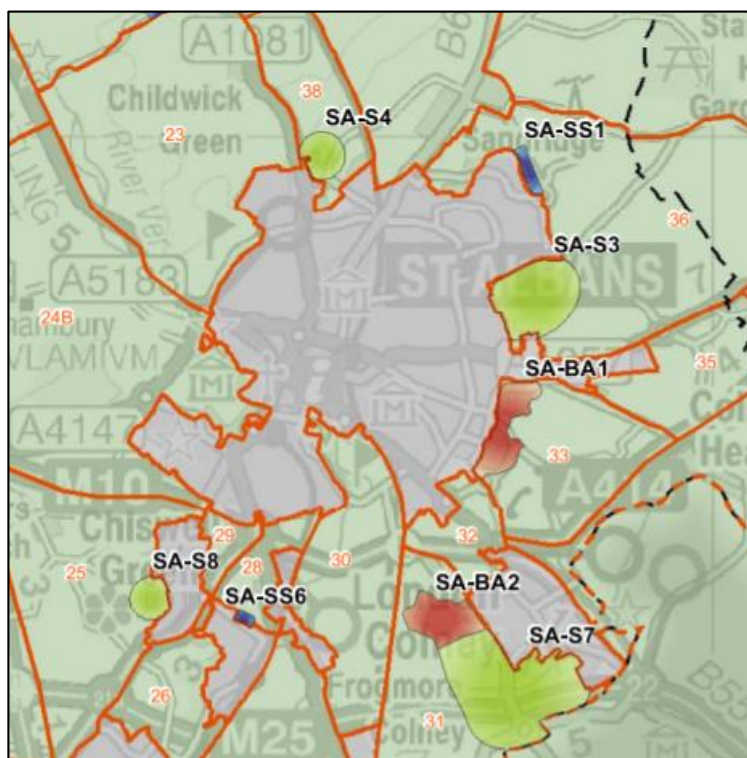


Figure 8.1: Land Contributing Least Towards Green Belt Purposes

(Source: Green Belt Review Purposes Assessment – Parcel Assessment Sheets for St Albans City and District Council November 2013)

The strategic sub-areas were reviewed in more detail in the Green Belt report February 2014, however this was a narrow assessment of them only and did not extend to the site, the subject of this submission.

When looked at in the context of other areas such as SA-S3 East of St Albans, (a proposed allocation in the withdrawn Local Plan) and the recommended adjustment to the existing boundary SA-BA1, it seems logical that the eastern

edge of St Albans will need to have a new Green Belt boundary established, effectively rounding off the settlement and creating a robust and defensible edge to the eastern side of the City.

The 2013 reports assessment of parcel GB36 concluded that in terms of the principal function of the Green Belt the parcel made a significant contribution towards preventing St Albans and Hatfield from merging, safeguarding the countryside and maintaining the existing settlement pattern. Overall it was considered that the parcel contributed significantly towards three of the five Green Belt purposes.

As part of Sites and Boundary Study undertaken in 2014 site SA-S3 East of St Albans was assessed in more detail and subsequently became a proposed allocation in the now withdrawn Local Plan. The indicative layout is shown at Figure 1 below.



Figure 1: Indicative Layout SA-S3 East of St Albans

(Source: Sites and Boundary Study for St Albans District Council: Figure 5.3 Indicative Layout Site 3 East of St Albans, Jan 2014)

It is our view that a more detailed assessment needs to be undertaken at a site specific level of all potential allocation sites. This is particularly important in relation to this site as its development will provide the opportunity to strengthen the settlement edge and introduce significant compensatory environmental benefits and improved public access without resulting in any significant harm to the overall function of the remaining Green Belt in this particular location.

The site lies immediately to the north of the previously proposed East of St Albans allocation and looking at Figure 1 above, if the site were included as an allocation, it would allow the settlement boundary to extend to the north to include the adjoining Woodstock Caravan Site which would mean that the proposed yellow allocation could also be extended further to the East increasing the potential for housing delivery.

When considered against the five purposes of the Green Belt set out at paragraph 134 of the NPPF, the site is not considered to make any significant contribution to the fundamental aim of Green Belt policy, which is to prevent

urban sprawl, by keeping land permanently open. The key purpose of parcel GB36 is to prevent St Albans and Hatfield to the East from merging. Considered on its own merits, the site would make a logical extension of the settlement, and the land could be used much more efficiently, provide a more defensible boundary to the eastern edge of the City and improve opportunities for public access to the countryside. Compensatory environmental benefits, enhanced public access, biodiversity improvements and carbon capture can all be included. In addition, it would support the extension of the area of land previously considered for allocation to the East of St Albans. All these environmental, social and visual benefits would demonstrably outweigh any limited harm associated with the loss of a small parcel of arable farmland from the Green Belt.

Call for Sites Submission

The site north of Sandpit Lane comprises 9.0 hectares of open agricultural land, immediately adjacent to the eastern settlement boundary of St Albans Town. It is being promoted as a residential development site for both market and affordable housing with a significant area of public open space, to contribute towards compensatory environmental improvements to the Green Belt. The landowners are open to discussions with the City & District Council regarding the quantum of the site that should be provided as public open space, but it is considered that the environmental improvement area could provide between 30-50% of the total site area. In addition, it could produce significant biodiversity net gains and also contribute to carbon offsetting. The site will also be able to facilitate improved public access to the countryside and enhance the connectivity of the surrounding public rights of way network. In this regard, it is considered that the site has a capacity for approximately 200 dwellings, dependent partly upon the scale of the environmental improvements area.

The proposed site is approximately 3.7 kilometres north-east of St Albans Town Centre and 4.4 kilometres west of Hatfield. The site benefits from road frontage along House Lane which is the most logical location for a highway access point. There are also a number of footpaths and public rights of way, including footpath 49 which runs along the north-western site boundary and connects in with bridleway 48 and footpath 52 to the west and bridleway 51 to the south, providing excellent pedestrian connections.

Immediately north of the site is the Woodstock Caravan Site, to the east and south is open agricultural land, with residential development immediately west of the site, alongside House Lane. The site is relatively well screened with existing, established trees running along the western boundary, Oak Farm to the north, Sandpit Lane to the south and Coopers Green Lane to the east. In addition to this, as a previously undeveloped green field site, it can easily and relatively quickly be made available for development.

The site is considered to be relatively constraint free, with any potential impacts able to be sufficiently mitigated against. Oak Farm immediately north of the site comprises three Grade II Listed Buildings; however, it is considered with the inclusion of the northern half of the site to provide compensatory environmental improvements a sufficient natural buffer will be provided to prevent any adverse impacts on the setting of nearby Listed Buildings. The site is considered to be at low risk from flooding, located in flood zone 1, and at minimal risk from surface water flooding.

Located immediately adjacent to the St Albans settlement boundary, the District's main town and a key focus for growth in the terms of the settlement hierarchy in any new Local Plan, the site is sustainably located with convenient access to local facilities and public transport. The site is located in a sustainable location, being immediately adjacent to the Newgate Close bus stops on route 653 which runs regular services. Further to this, the site is



located within 1 kilometre of both St John Fisher Roman Catholic School and Skywood Primary School. Additionally, further key facilities including a library, food shops, churches, restaurants and bars / coffee shops are also located within 1.5 kilometres of the site at Sandpit Lane.

As set out above, the site lies immediately to the north of the previously proposed East of St Albans allocation. Its allocation and development would also help to facilitate an expansion of the East of St Albans allocation and the inclusion of compensatory environmental improvements to the Green Belt on both sites, conjoined would help strengthen the edge of the settlement improving the setting of this edge of the City in the wider landscape.

Summary

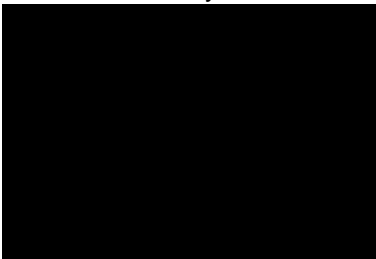
The recent withdrawal of the Draft Local Plan identifies the importance of ensuring residential allocations comprise a range of site sizes and locations. The site at Sandpit Lane is constraint free, immediately adjacent to the St Albans settlement boundary and capable of delivering a medium sized residential development. The site is deliverable and in a sustainable location, with capacity to support considerable development, being one of a range and variety of potential allocations which can contribute to the housing supply in the St Albans District Council Area.

The site is in a single land ownership and available for development and there is positive developer interest. Allocation of this site and its subsequent development could bring significant positive social, economic and environmental benefits. It could deliver a substantial number of market and affordable houses to help meet the Council's acute housing needs in a sustainable location on the edge of the City of St Albans, the District's largest settlement and a focus for growth in the new Local Plan.

As set out above, when the site is considered against the five purposes of the Green Belt, demonstrably it makes a negligible contribution to the fundamental purposes of the Green Belt. There is an established essential need to identify suitable Green Belt opportunities to meet the Council's acute housing needs and it is considered that this is a suitable site, in a location where the Green Belt performs a very limited function. It could also strengthen the function of the Green Belt to the east of the City and facilitate an expansion of the previously proposed East of St Albans allocation. Together the two sites could significantly enhance the landscape setting and edge of the settlement. The associated benefits of an expansive open space coupled with market and affordable housing delivery, should be considered sufficient evidence and justification to demonstrate the exceptional circumstances necessary for the site to be released from the Green Belt.

Should you have any questions about this submission or like to discuss it, or the site in more detail, please do not hesitate to contact me. The landowners would be happy to provide further information to assist with deliverability and work with the Council to produce a detailed development brief for the site.

Yours faithfully





Strutt & Parker

Encs.



Spatial Planning Team,
St Albans City and District Council, Civic Centre,
St Peters Street,
St Albans,
Hertfordshire,
AL1 3JE

08/03/2021

Dear Christopher,

St Albans City and District Council Call for Sites 2021

Sandridge Farm, Sandridgebury Lane

Lightwood Strategic is promoting Sandridge Farm, Sandridgebury Lane as part of a strategic urban extension to the North of St Albans.

The land has not previously been submitted as part of a call for sites process, and thus it has yet to feature within any Housing Economic Land Availability Assessment. The land was however introduced to the Council in my email to you of February 5th 2020.

The site forms part of a wider strategic area that sits between the urban edge of St Albans and Heartwood Forest. To the immediate west the Council proposed to remove land from the Green Belt to enable the development of 1,100 homes at 'North St Albans' in the now withdrawn 2036 Local Plan.

Hertfordshire County Council also owns land within the wider strategic area. Lightwood Strategic and Hertfordshire County Council, Mike Evans (Head of Development) and Andrea Gilmour (Property Planning Manager) met on May 12th 2020 to discuss joint promotion.

On June 15th 2020, I emailed you once more to advise that both parties would *work collaboratively to explore the options for a comprehensive approach to development across our joint land ownerships/areas of control*. It was stated work will initially take place within the context of the emerging South West Hertfordshire JSP. Since then, circumstances have changed, and the 2036 Local Plan has been withdrawn. A new 2038 Local Plan process has begun and the JSP proceeds roughly in parallel.

As part of Lightwood's call for sites submission, we are presenting a series of technical studies that cover the wider strategic area. These were instructed by Lightwood Strategic and are available via Dropbox link in my covering email.

Head Office: Oak House Mews, 43 The Parade, Claygate, Surrey KT10 0PD
4 Carlos Place, Mayfair, London W1K 3AW
2 Farleigh Court, Old Weston Road, Flax Bourton, BS48 1UR

01372 464 819
lightwoodgroup.com



The studies cover:

- Heritage (EDP, March 2021)
- Landscape and Visual (EDP, March 2021)
- Green Belt (EDP, March 2021)
- Transport (Pegasus, March 2021)
- Ecology (Ethos (March,2021)

The studies address the pertinent issues within the site and the wider study area, and demonstrate that there are no-principle suitable issues or achievability issues. The studies serve to inform a comprehensive masterplanning approach.

Based on the studies, Clifton Emery Design has been instructed by Lightwood to prepare a first phase concept master plan to illustrate how a comprehensive development could come forward within the study area. This masterplan also includes a series of options plans for the St Albans Road frontage.

Due to the immediate commencement of the call for sites consultation following adoption of the LDS, this work has progressed at pace and Lightwood will reconvene with Hertfordshire County Council to consider next steps and further master planning optioneering (uses and disposition). This work will include a preliminary surface water drainage strategy and a utilities strategy.

At this stage, the technical assessment and master planning outputs identify that an urban extension in this location could generate up to 1,500 homes, alongside a 3-form entry primary school, open space and a neighbourhood centre including local needs retailing and other Class E space. It is expected, at this stage, that secondary school place provision for St Albans would be achieved via the development of a new 8FE north of Oakland College, as suggested in the withdrawn Local Plan.

A key feature of the concept is the continuation of the masterplanning approach to cycling that was set out in respect of the emerging North St Albans proposals. The use of Sandridgebury Lane as a strategic cycle route was a key theme and our concept plan continues this strategy to enable a dedicated route all the way into Heartwood Forest. The proposed internal highway network is suitably aligned away from Sandridgebury Lane aside from under the railway. Here the Transport Strategy Report (Pegasus) examines how the lane can function in this location to connect east to west for all modes.

Another key feature of the concept masterplan is the green infrastructure corridor that crosses the proposed Sandridgebury Lane cycle route to connect Jersey Farm Woodland Park to Heartwood Forest thus affording the north east part of St Albans direct access to the woodland.

Three vehicular access points are shown: one from St Albans Road, one from Sandridgebury Lane (North) where the carriageway can be widened using adopted highway land, and another to connect under the railway. The cycle route takes a spur of the Sandridgebury Lane to connect to Sandridge by the village hall. The existing PROW through the recreation ground can be upgraded for this purpose.



We encourage the Council to think comprehensively, not only in terms of the site/strategic study area but also in respect of the northern expansion of St Albans on both sides of the railway and the interaction and relationships between the two areas by different modes of transport. There is undoubtedly a strategic growth proposition either side of the railway, with Heartwood Forest and the Chidwickbury Conservation area acting as strategic constraints that will define a permanent boundary for the town.

Other Comments on Previously Promoted Sites

Lightwood has tracked the progress of the now withdrawn Local Plan and the evidence base including the call for sites submission and representations of others. Because several locations were discounted on account of Green Belt performance they were not assessed in detail in relation to other matters.

The following comments on other strategic options may be of assistance, as the issues we raise are not alluded to in vision documents etc.

- CP Holdings at Windridge Farm (Hemel Hempstead Road) (1200 homes) – the vision document makes absolutely no mention of the preservation in situ archaeological designation associated with Prae Wood SAM. Having regard to the proposed masterplan this archaeologically rich area, if removed from the area to be master planned, corrupts the overall concept. It is interesting to note that vehicular access is not proposed from St Albans itself (Mayne Avenue) and only from the Hemel Hempstead Road.
- CWC Group at Chiswell Green (900 homes) – The concept involves the relocation of St Albans FC within a high-density development (with the density necessary to generate the value to feed the construction of a new stadium). The vision document references the electricity transmission lines that cross the site and suggests that these could be diverted or undergrounded. Often a form of diversion is achievable, but the transmission line that crosses the site are National Grid 440KV transmission lines (the motorways of the grid). It is well known that National Grid does not countenance the diversion of its infrastructure except in exceptional circumstances, e.g. a national significant infrastructure project such as HS2. The CWC housing/sports ground concept is not achievable although employment land may be achievable.
- Tarmac at How Wood (2,300 homes own the land between Frogmore and How Wood. At first glance this look alluring, as a replacement for Park Street Garden Village given the train station. Notwithstanding the flood risk, ecology, ground remediation required and possible residual archaeological interest (we understand the Roman Villa was destroyed as a result of mineral extraction), it is access which is a key issue. Tarmac's promotion documentation is light on highways matters, especially the access strategy. Environmental issues aside, the claim is for 2,300 units but we observe major vehicular access issues to serve anything approaching this level of development. Tarmac has not evidenced what is achievable off Moor Mill Lane and the junction with the A5183 (and the scope for improvements). Clearly there is no vehicular way in or out to Park Lane Street to the east. What is achievable is likely to be a fraction of what is claimed.

Housing Requirement and Supply Comments

At the beginning of a new Local Plan process the overall housing requirement and site/land requirements can be summed up as follows.

- i. The annual housing requirement will be at least 893 per annum and thus 16,074 for the period 2020-2038.
- ii. The withdrawn Local Plan identified land for 14,872 homes for the period 2020-2036.
- iii. Once the contribution of Park Street Garden Village is excluded (2,600 homes in total and 1,670 to 2036) the identified supply falls to 13,202.
- iv. That is a shortfall of 2,872 homes against 16,074.
- v. As part of the supply of 13,202 (to 2036), 880 units were estimated from large windfall sites and a further 1,670 units were forecast on small unidentified brownfield windfall sites. The comparable figures to 2038 would be 1,040 (+160) and 1,880 (+210), totalling 2,920 units of windfall supply
- vi. The Council may decide to add an additional 370 units to the new baseline supply figure of 13,202 to achieve 13,572.
- vii. That would leave a reduced supply gap of 2,322 units to achieve the requirement to 2038.
- viii. We consider that the windfall supply is poorly evidenced, and even if this was to be accepted in full, there would be no flexibility beyond the minimum plan requirement.
- ix. A10% flexibility allowance (+1,600 units against the overall housing requirement) would cover the uncertainty in the windfall supply in the windfall and slower than anticipated delivery on large allocations.
- x. This would increase the supply gap to nearly 4,000 homes.
- xi. There is also a very strong case for taking the plan period back two years to 2018. If the Council had not failed to get its last plan through examination, these additional two years would have been planned for at 893 per annum. This would add a further 1,786 homes to the need from 2018. Completions for 2018-2020 totalled 854 homes and so the difference is 932. If these homes are not planned for then they slip through the net due to the Council withdrawing its previous Local Plan from examination.
- xii. If these 932 units are added to the housing requirement the supply gap increases to 5,000 homes
- xiii. Finally, the adoption plan is scheduled for the end of 2023. If this creeps into the 2024/2025 monitoring year (which is quite likely) then, due to the need to plan for 15 years post adoption, another 893 homes would need to be planned for, taking the supply gap to nearly 6,000 to 2039.



LIGHTWOOD

We advise that the Council makes an interim position statement on these matters, for consultation, before the Regulation Draft Local Plan is published. All the above assumes no unmet need is catered for from Watford or other authorities to 2038/2039.

Should the Council wish to clarify any call for sites matters in respect of our submission we would be pleased to assist. In similar fashion we are available to take part in any joint meeting with the County Council.

Your sincerely



Lightwood Strategic

SANDRIDGEBURY FARM, ST ALBANS

Lightwood Strategic Land Control



LIGHTWOOD

