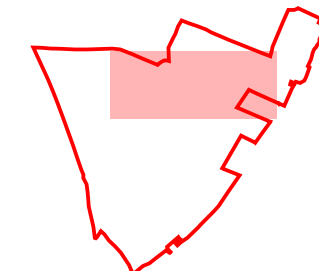
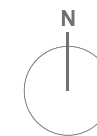
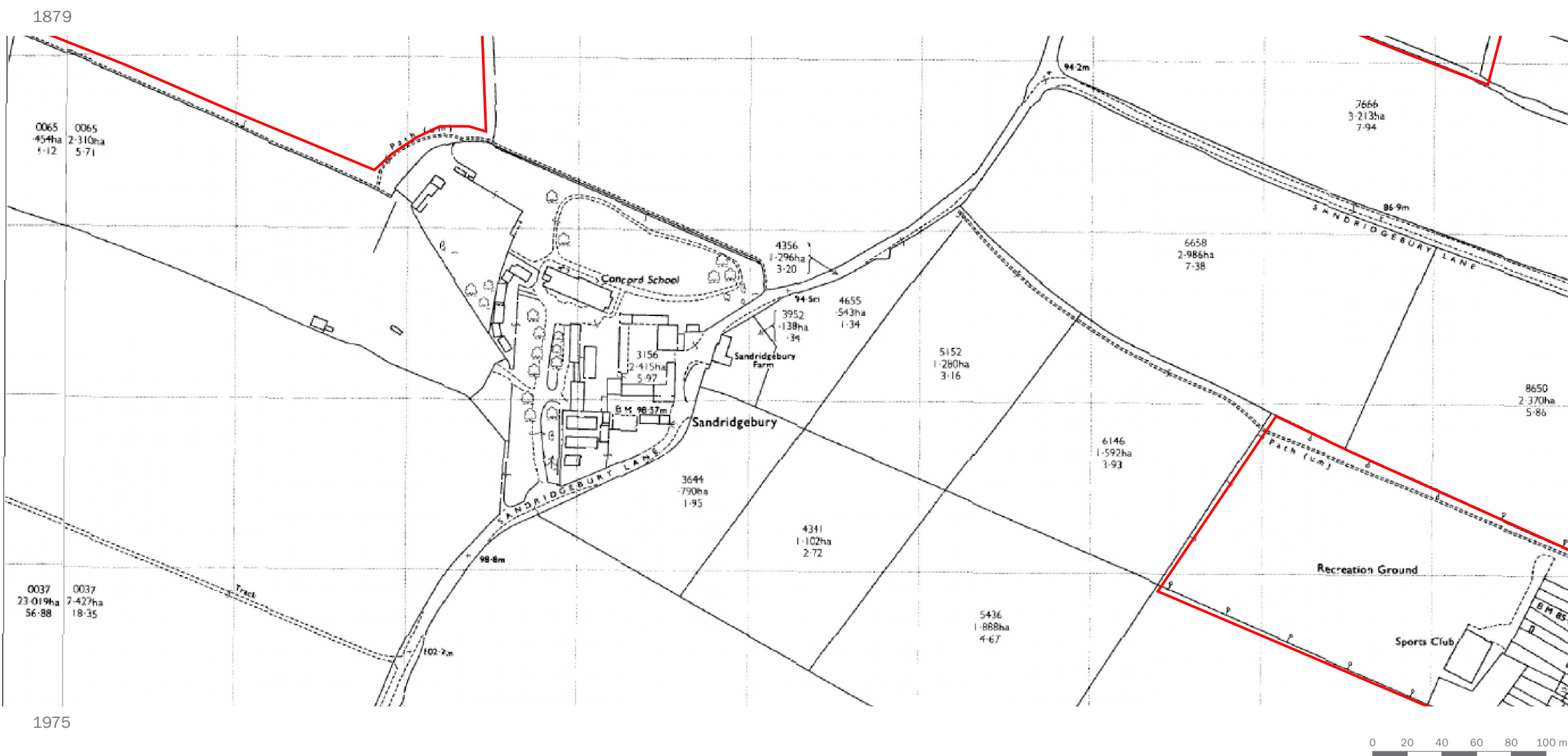


 Approximate Study Area



client  
**Lightwood Strategic**

project title  
**Land at Sandridgebury Lane, St Albans**

drawing title  
**Plan EDP 3: Extracts from Historic Mapping**

date **08 MARCH 2021** drawn by **EO**  
drawing number **edp6902\_d003a** checked **MM**  
scale **1:3,000 @ A3** QA **RB**



Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk



the environmental  
dimension partnership

**CARDIFF**  
**02921 671900**

**CHELtenham**  
**01242 903110**

**CIRENCESTER**  
**01285 740427**

**info@edp-uk.co.uk**  
**www.edp-uk.co.uk**

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**URBAN  
DESIGN  
GROUP** REGISTERED  
PRACTICE

**IEMA** Transforming the world  
to sustainability

**Landscape  
Institute**  
Registered practice

**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](mailto: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.

<b>Your Details</b>	
Name	[REDACTED]
Company/Organisation	Pegasus Group
Address	Suite 4, Pioneer House, Vision Park, Histon, Cambridge
Postcode	CB24 9NL
Telephone	[REDACTED]
Email	[REDACTED]
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

<b>Site Details</b>			
<b>Requirements:</b>			
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>			
Site address/location (Please provide a map showing the site boundary)	Land to the North of Sandridge, east of High Street / B651		
Site area (in hectares)	6ha		
Coordinates	Easting	517326	Northing 210862
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)	[REDACTED]		
Current land use	Agricultural land (arable)		
Condition of current use (e.g. vacant, derelict)	[REDACTED]		
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	<p>The site is located adjacent to Sandridge, a sustainable settlement capable of accommodating growth and the site forms a natural extension to the existing settlement being bound by existing residential development to the south and the permanent and defensible boundary of Heartwood Forest to the north.</p> <p>The site is deliverable in terms of suitability (i.e. no environmental, technical, physical or legal/ownership constraints), available (i.e. being actively promoted by a willing landowner) and viable (i.e. no anticipated abnormal costs associated with the development of the land) and capable of accommodating approximately 150 new homes as indicated in the enclosed Concept Masterplan.</p>
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 Presentation 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 checked="" type="checkbox"/> Yes <b>TBC</b> (but considered feasible, as the site adjoins existing residential development) <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

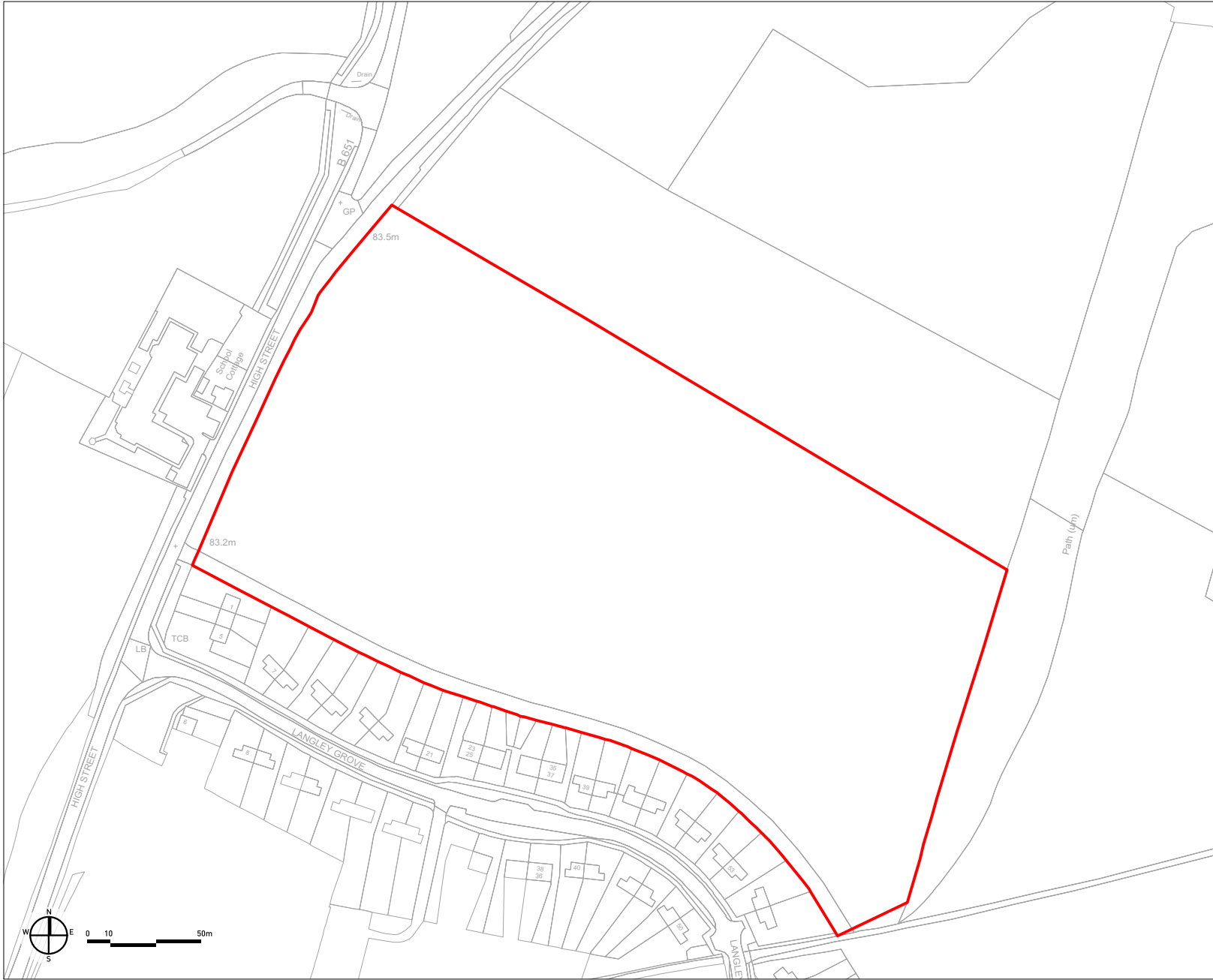
	<p>Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).</p>
--	--	---

	<p>Other constraints affecting the site</p>	<p><input checked="" type="checkbox"/> Yes (If yes, please specify)  <input type="checkbox"/> No</p> <p>The site is located within the Metropolitan Green Belt, but is not subject to any other planning policy, environmental, heritage, physical or legal constraints.</p> <p>However, the emerging Local Plan provides the appropriate mechanism to review the boundaries of the Green Belt at this location in accordance with paragraph 136 of the National Planning Policy Framework</p>
<p>Planning Status</p>	<p><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</p> <p>Please include details of the above choice below:</p>	

	<p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p>n/a – no planning history yet recorded at this site but has been the subject of considerable interest from the housebuilding sector.</p>
Other comments	<p>The site is located adjacent to Sandridge, a sustainable settlement capable of accommodating growth. The site is deliverable in terms of suitability (i.e. no environmental, technical, physical or ownership constraints), available (i.e. being actively promoted by a willing landowner) and viable (i.e. no anticipated abnormal costs associated with the development of the land).</p> <p>The site is considered to make a limited contribution to the purposes of the Green Belt and therefore the release of the site from the Green Belt will not result in significant harm in Green Belt terms.</p> <p>Further details can be found within the Regulation 18 and Regulation 19 Representations and EiP Hearing Statements submitted to the previous Draft St Albans Local Plan.</p>



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KEY  
SITE BOUNDARY

### LAND AT SANDRIDGE, ST ALBANS - SITE LOCATION PLAN





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**Commentary**

**Movement**

- 1) Potential access off High Street B651
- 2) Existing recreational path adjacent to eastern edge of the site
- 3) Existing Public Right of Way south of the site
- 4) Opportunity to create a link towards existing Bus Stops, village shop, church and pubs on the High Street
- 5) Opportunity to create a pedestrian link onto existing Public Right of Way

**Landscape**

- 6) Retain existing hedgerow
- 7) Enhanced Heartwood Forest landscape buffer along northern edge of the site to protect views on approach to settlement edge
- 8) Highest part of the site. Provide open space to protect longer distance views and settlement character.
- 9) Land begins to fall to the south east corner. Potential area for SUDS.
- 10) Lowest point of the site. Potential area for SUDS.
- 11) Heartwood Forest

**Urban Design**

- 12) Design against potential noise source from High Street B651
- 13) Design an outward looking development to create a softer edge
- 14) Create rear to rear gardens to protect the residential amenity of neighbouring properties with 5m buffer
- 15) Gateway feature square
- 16) Play area/Public Open Space



Rev	Date	Note

## St Albans Call for Sites 2021 - Site Identification Form

<b>Your Details</b>	
<b>Name</b> [REDACTED]	
<b>Company/Organisation</b> Jarvis Homes Limited	
<b>Address</b> 1 Waterside Harpenden Herts	
<b>Postcode</b> AL5 4US	
<b>Telephone</b> [REDACTED]	
<b>Email</b> [REDACTED]	
<b>Your interest</b>	
Site Owner	
Planning Consultant	
Registered Social Landlord	
Local Resident	
Developer	✓
Community	
Other	
<b>Site address/location (Please provide a map showing the site boundary)</b> Land at South East of Highfield Road, Sandridge, St Albans, AL4 9BU See attached site plan	
<b>Site area (in hectares)</b> 1.8689	

<b>Coordinates</b>	
<b>Easting</b> 516912	
<b>Northing</b> 210106	

<b>Site Location Plan Attached</b>
Yes ✓
No

<b>GIS mapping shapefile attached (in .shp file format)</b>
Yes
No ✓

<b>Land ownership (please include contact details if known)</b> ████████████████████ ████████████████████ ██████████ ██████████ ██████████ ██████████
<b>Current land use</b> Scrub trees and bushes.
<b>Suggested land use</b> <ul style="list-style-type: none"> <li>• Housing ✓</li> <li>• Gypsies &amp; Travellers</li> <li>• Mixed Use (please specify)</li> <li>• Employment</li> <li>• Renewable and low carbon energy and heat</li> <li>• Biodiversity Improvement / Offsetting ✓</li> <li>• Green Belt Compensatory Land</li> <li>• Land for Tree Planting ✓</li> <li>• Other (please specify)</li> </ul> <p>We propose the majority of the site, approx. 1.4 HA -14,296 m2 ( 76% ) is formally /legally donated to form part of Jersey Farm Woodland Park, the balance, 0.43 HA - 4,393m2 ( 24% ) is developed for housing</p>
<b>Reasons for suggested development / land use</b> The site is located adjacent to existing built form and its partial redevelopment would be logical in terms of adjoining built properties. The majority of the site would be donated to form part of Jersey Farm Woodland Park. The donated land could be passed in its current form or we would be willing to formally replant a new woodland
The site is identified as Green Belt land and built form which the site is adjacent to is also located within the established Green Belt. The site can easily be service from an extension to the existing adopted highway Highfield Road
The site is in a highly sustainable location, being 5 minute walk to the centre of Sandridge village, with its local shops, pubs and community centre. Utilising this land would support the viability of these existing facilities without any detriment to adjoining greenbelt.
This location will have experienced limited growth due to the blanket Green Belt designation covering the area and a small site such as that proposed would go a long way towards sustaining the viability of these local level services.

**Likely timescale for delivery of suggested development / land use**

- 1-5 Years ✓
- 6-10 Years
- 11-15 Years
- 15+ Years

**Site Constraints**

**Contamination/pollution issues (previous hazardous land uses)**

Yes  
No ✓

**Environmental issues (e.g. Tree Presentation Orders; SSSIs)**

Yes  
No ✓

**Flood Risk**

Yes  
No ✓

**Topography affecting site (land levels, slopes, ground conditions)**

Yes  
No ✓

**Utility Services (access to mains electricity, gas, water, drainage ect.)**

Yes  
No ✓

**Legal issues (For example, restrictive covenants or ownership titles affecting the site)**

Yes ✓  
No

**Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?**

Yes ✓  
No

**Other constraints affecting the site**

Yes - (If yes, please specify)  
No ✓

**Planning Status**

- Planning Permission Granted
- Planning Permission Refused
- Pending Decision
- Application Withdrawn
- Planning Permission Lapsed
- Pre-Application Advice
- Planning Permission Not Sought
- Other ✓

**Please include details of the above choice below (for example planning reference numbers and site history)**

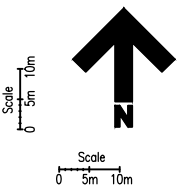
- 5/0368/79 Application for 34 new houses Refused
- 5/1210/80 Application for 52 new houses Refused
- 5/94/1437 Application for 2 new houses Refused
- There have been no Applications on the site since 1995.

**Other comments**



Development site  
(4,393sqm - 1.086Acres)

Trees & Landscape area to be donated to  
Jersey Farm Woodland Park  
(14,296sqm - 3.532Acres)



⊠ EASTING = 516912  
NORTHING = 210106

Total site area  
(18,689sqm - 4.618Acres)

**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.

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- 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.

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

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- 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.

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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](mailto: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.

<b>Your Details</b>	
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

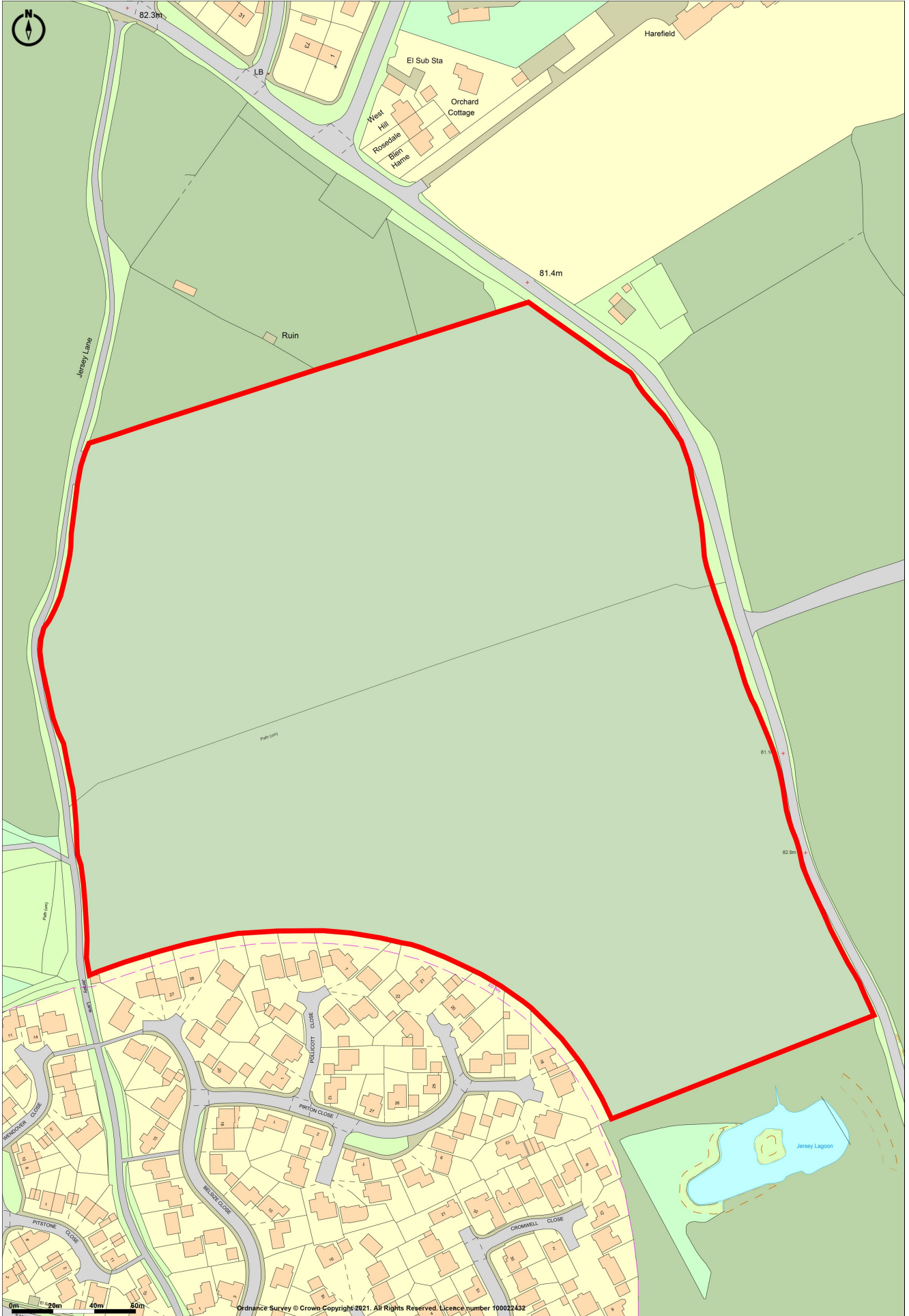
<b>Site Details</b>					
<b>Requirements:</b> <ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land to the West of House Lane, St Albans				
Site area (in hectares)	10				
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	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 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 <hr/> Please include details of the above choice below (for example planning reference numbers and site history)	
Other comments	Please see accompanying supporting statement.	

Site Location Plan



**Cambridge office**

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

Cambridge@struttandparker.com  
[struttandparker.com](http://struttandparker.com)



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

Direct Dial: [REDACTED]

Email: [REDACTED]

Our Ref: [REDACTED]

8<sup>th</sup> March 2021

**BY EMAIL:** [planning.policy@stalbens.gov.uk](mailto:planning.policy@stalbens.gov.uk)

Dear Sir or Madam

**Re: St Albans City & District Local Plan 2020-2038: “Call for Sites” – Land to the West of House Lane, St Albans**

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.

10 hectares of land is being promoted by a single landowner, as a residential use development site, including approximately 5 ha for market and affordable housing and 5 ha for 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 29<sup>th</sup> March 2019. Following the stage 1 hearing sessions held in January 2020, the Local Plan Inspectors wrote to the Council on 27<sup>th</sup> 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 14<sup>th</sup> April 2020 and 1<sup>st</sup> 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. However, it is important to note that in respect of the assessment of land contributing least towards the purposes of the Green Belt the southern part of the site, as shown on Figure 8.1 reproduced below, was included as part of site SA – SS1 a small scale sub-area. While the strategic sub-areas were reviewed in more detail in the Green Belt report February 2014, it does not appear that the small sub-areas were given further consideration.

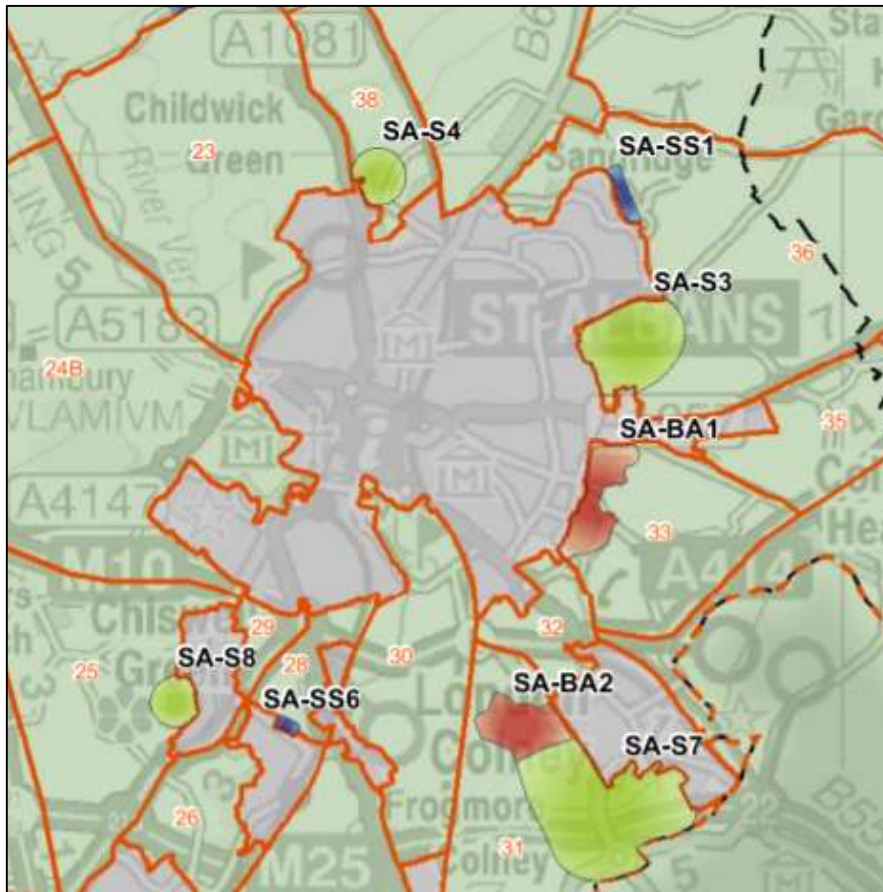
When looked at in the context of other areas such SA–S3 East of St Albans, (a proposed allocation in the withdrawn Local Plan) and the recommended adjustment to the existing boundary SA–BA1, it seems logical that the eastern edge of St Albans will need to have a new Green Belt boundary established, effectively rounding off the settlement and creating a robust and defensible edge to the eastern side of the City. In the north-east area, it seems that House Lane establishes such a defensible boundary, however the settlement requires to be rounded off through a connection to the Jersey Farm Woodland Park to the west which would establish a more defensible boundary between St Albans and Sandridge to the north.

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 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.

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. 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 can secure. 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 buffer to Sandridge whilst enhancing the landscape setting of the City and improving opportunities for public access. Compensatory environmental benefits, enhanced public access, biodiversity improvements and carbon capture can all be included. 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.



**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)

## Call for Sites Submission

The site at House Lane comprises approximately 10 hectares of open agricultural land, currently designated as Green Belt. It is being promoted as a residential development site for both market and affordable housing (approximately 180 units) with a large area (approximately 5 ha – 50%) of public open space, to contribute towards compensatory environmental improvements to the Green Belt. 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.

The site is located immediately north of the St Albans settlement boundary, 3.6 kilometres from the Town Centre, and 0.6 kilometres south of Sandridge. The site benefits from considerable road frontage along House Lane, allowing several potential options for an access point. There are also a number of footpaths and public rights of

way, including Jersey Lane which runs along the western boundary, providing excellent pedestrian connections. The site is considered to be relatively constraint free, it is located in flood zone one and at low risk of surface water flooding, it is not covered by any statutory designations and is not in close proximity to any heritage assets.

Located immediately adjacent to urban area of St Albans, 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. Within 1 kilometre of the site are several schools, both primary and secondary, and other local amenities including shops, bars / coffee shops, churches and a pharmacy. Further to this, the site is located less than half a kilometre from the Jersey Farm bus stop, served by bus route 653; a regular, 7 day a week service between Welwyn, Hatfield, St Albans and New Greens.

As can be seen from Figure 1 below, the site adjoins Jersey Farm Woodland Park to the west and Jersey Farm Adventure Playground to the south. It is currently arable farmland with a sporadic hedgerow along its boundary with House Lane and a further hedgerow to the eastern side of Jersey Lane. The site is reasonably flat, and in the long views from House Lane the northern edge of St Albans is visible on the skyline. The site could be developed to deliver both market and affordable housing along with significant compensatory environmental improvements to the Green Belt. This could be through an extension of the Jersey Farm Woodland Park into the northern section of the site which would reinforce and soften the urban edge of St Albans and provide greater separation to Sandridge, enhancing the Green Belt's roles of preventing neighbouring towns from merging and safeguarding the countryside from encroachment.

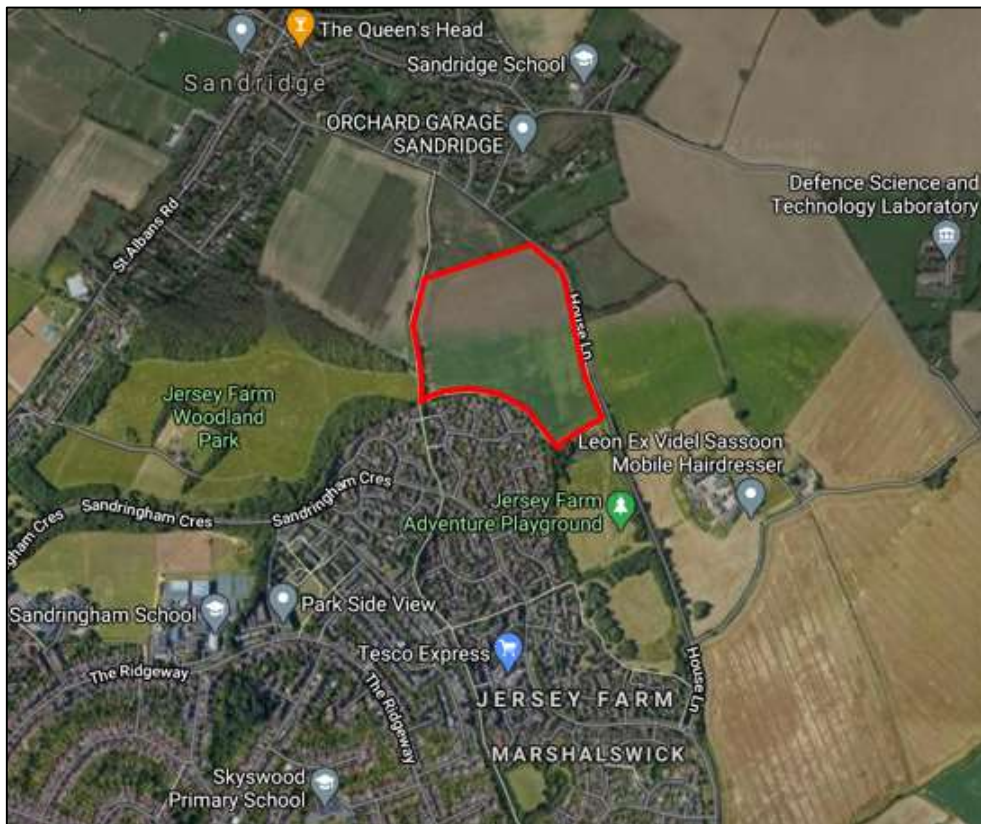
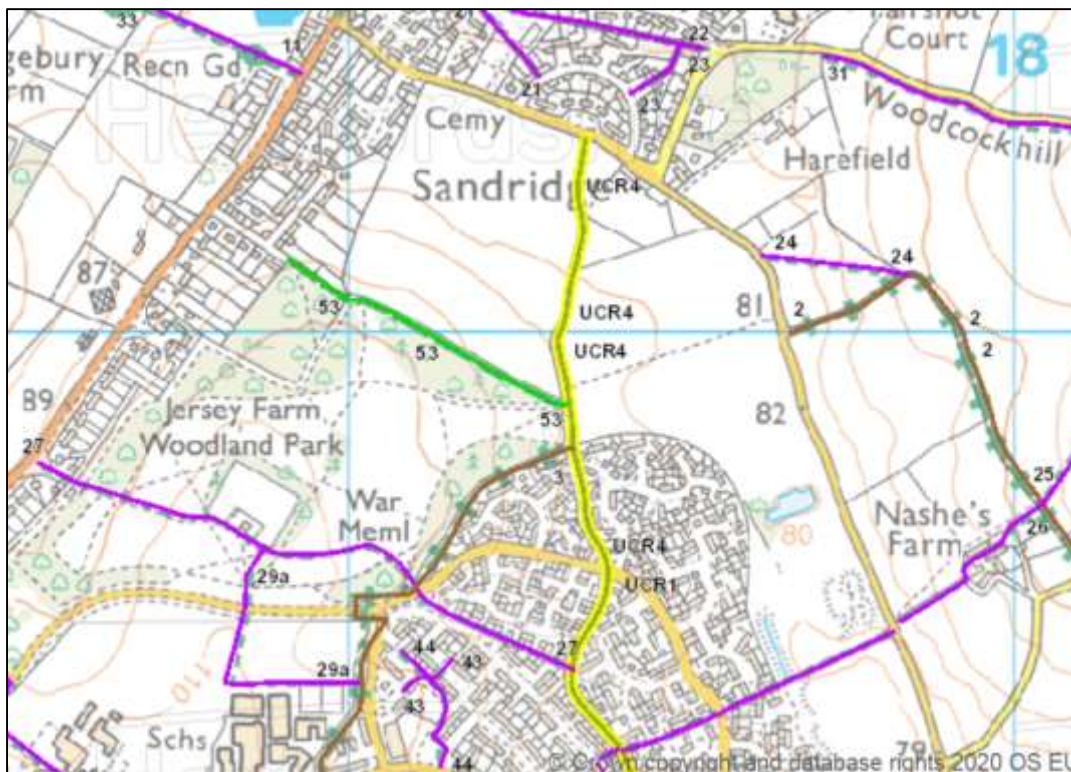


Figure 1: Site Location and Context

As referred to above and demonstrated in Figure 2 below, the site sits in the middle of the local public rights of way network. However, it currently forms a barrier to the east-west connectivity, and while there are some established desire lines around the northern fringe of the City these are not formally recognised. The inclusion of a large area of open space could also facilitate a series of east-west connections, allowing routes 2 and 24 in the east to be linked through the site to routes 53 and UCR4 to the west. In addition, route 3 could be extended around the northern side settlement. These new connections would provide significant public benefits through improved access to the countryside and the creation of a greater variety of circular walking routes.



**Figure 2: Hertfordshire County Council Rights of Way Map**

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 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. It could also strengthen the function of the Green Belt to the north of the City and safeguard Sandridge to the north from coalescence. The inclusion of an extensive area for compensatory environmental improvements, along with biodiversity net gains, landscape enhancements, increased opportunities for carbon capture/offsetting, and significant improvements to the public rights of way network, all represent positive social and environmental gains.

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

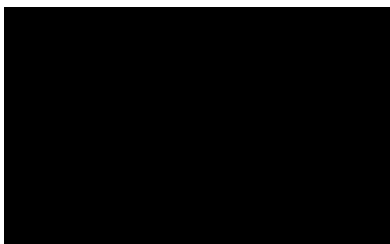
The recent withdrawal of the draft Local Plan identifies the importance of ensuring residential allocations comprise a range of site sizes and locations. The site at House Lane is constraint free, immediately adjacent to the St Albans settlement boundary and capable of delivering a medium sized residential 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 in the site. 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 north of the City and safeguard Sandridge to the north from coalescence. 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.