



### Key Points

- ① Access To Woollam Playing Fields Down Graded and Retained
  - ② Woollam Playing Fields Complex
  - ③ Relocated Sports Pitches
  - ④ St Albans Girl School - Potential for a new pick up and drop off to be explored
  - ⑤ Assisted Living Apartments
  - ⑥ Neighbourhood Centre Around Community Gardens and Public Square
  - ⑦ School / Nursery
  - ⑧ Community Building and Site management Suite
  - ⑨ Care Home
  - ⑩ Formal Children's Play
  - ⑪ Formal Teenage Play
  - ⑫ Community Growing Spaces
  - ⑬ Neighbourhood Centre Car Park
  - ⑭ School Fields Inaccessible to public
  - ⑮ Western Common: Open Space / Formal Parkland
  - ⑯ Central Common: Open Space / Informal Parkland
  - ⑰ Sandridgebury Lane Biodiverse Corridor SUDS / connected habitats
  - ⑱ Community Orchard
  - ⑲ Eastern Common: Wet Meadow / SUDS soakaway
  - ⑳ Longspring Ancient Woodland Retained with 30m Buffer
- Potential alternative location for the care home - subject to further viability testing



08 March 2021

Our Ref: OJ/16.154

Chris Briggs Esq  
St Albans Council Offices  
St Peters Street  
St Albans  
Hertfordshire  
AL1 3JE

By email only: [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

Dear Chris

### **St Albans Local Plan 2020-2037**

I am writing on behalf of Hallam Land Management Ltd (Hallam) and St Albans School in response to the current Call for Sites exercise and attached is our submission in relation to the land they control at North St Albans.

You will be aware that North St Albans was identified in the 2018 Local Plan Submission Version as one of its Broad Locations reflecting the long-established fact that the Green Belt boundary around the City's main settlement should be amended in order to meet the District's housing needs, and the suitability of this location, and Site, to accommodate new development. In Appendix 2 of the Local Plan, North St Albans was to one of two Broad Locations to deliver new housing soonest in the Plan period thus underlining its importance to future housing supply in the District.

Pursuant to Policy S6(vi) of the 2018 Local Plan, significant progress was made with the collaborative masterplan required by the Council during 2019 and 2020 and this reached an advanced stage, such that it provides a clear illustration of how this land can be developed. Hallam and St Albans School continue to support the delivery of new development at North St Albans in the manner set out therein.

In addition to this representation, other submissions have been made on behalf of St Albans School which refer to its additional landholding and the opportunities that it provides for additional development in this location.

Should you have any queries, or wish to discuss the attached in greater detail, please do not hesitate to contact me.

Your sincerely,



**Owen Jones**  
**Director**



**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	Adam Davies
Company/Organisation	Strutt & 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

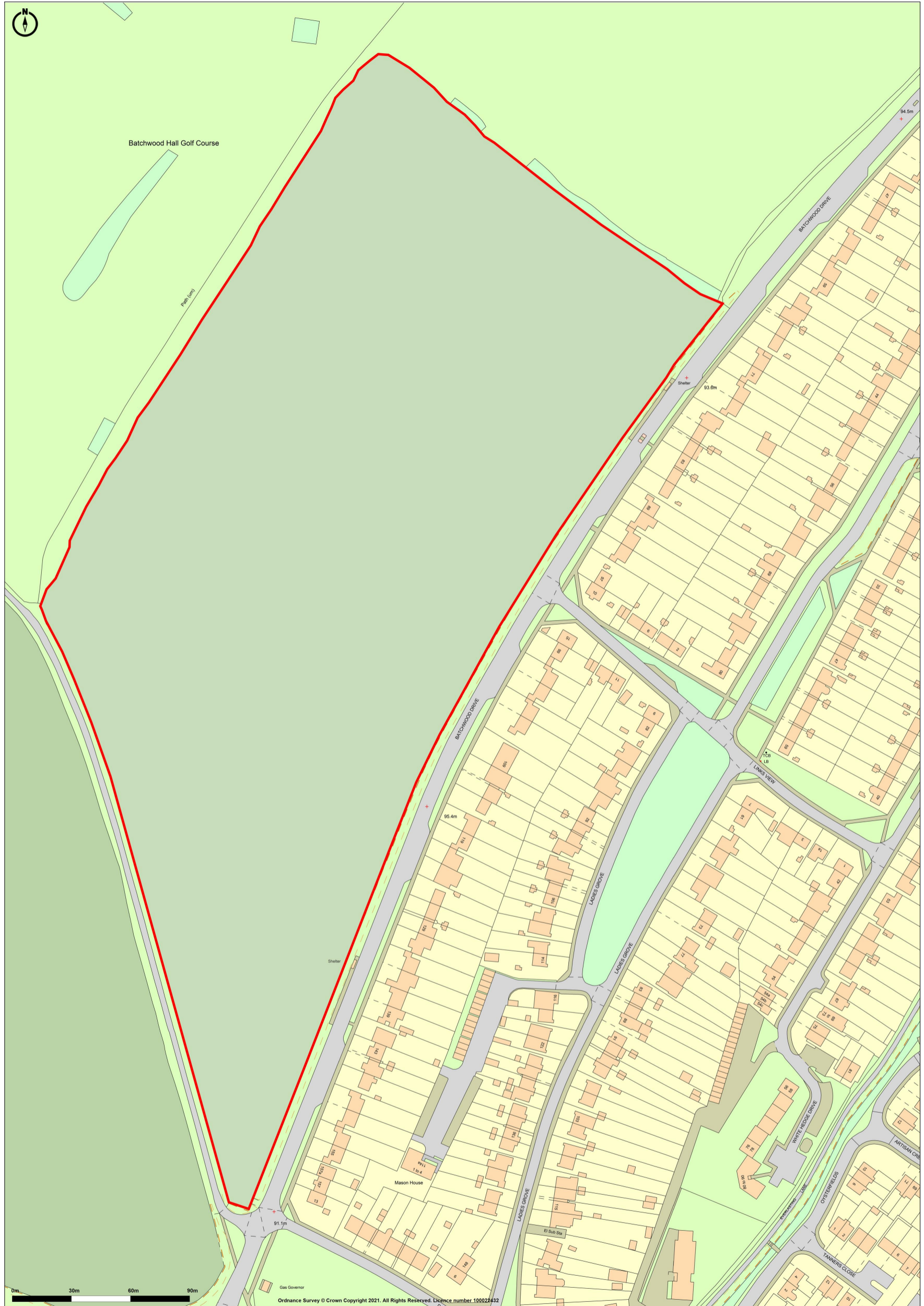
<b>Site Details</b>					
<b>Requirements:</b>					
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Batchwood Drive, St Albans				
Site area (in hectares)	8.8				
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)	<div style="background-color: black; width: 100%; height: 1em; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 1em;"></div>				
Current land use	Agricultural				
Condition of current use (e.g. vacant, derelict)	Available Agricultural Land				
Suggested land use	<input checked="" type="checkbox"/> Housing (Including custom build) <input type="checkbox"/> Gypsy & Travellers <input checked="" type="checkbox"/> Mixed Use (please specify) – Primary School <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 accompanying Cover Letter and supporting documents.				

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 supporting information set out in the Covering Letter and the following accompanying documents: <ol style="list-style-type: none"> <li>1. Land off Batchwood Drive, St Albans: Review of Constraints and Opportunities (Alan Baxter)</li> <li>2. The Case for Custom Build (LIVEDIN)</li> <li>3. Primary School Search Report (VINCENT + GORBING)</li> </ol>	





LIVED IN



# The Case for Custom Build

ST ALBANS  
Land West of Batchwood Drive



Custom Build project in Stroud by Lived•in - completion late 2018

# What is Custom Build?

Self Build and Custom Build are both concerned with the home-owner taking control and building a house which perfectly suits their individual needs, stepping away from the limitations of generic speculative developments.

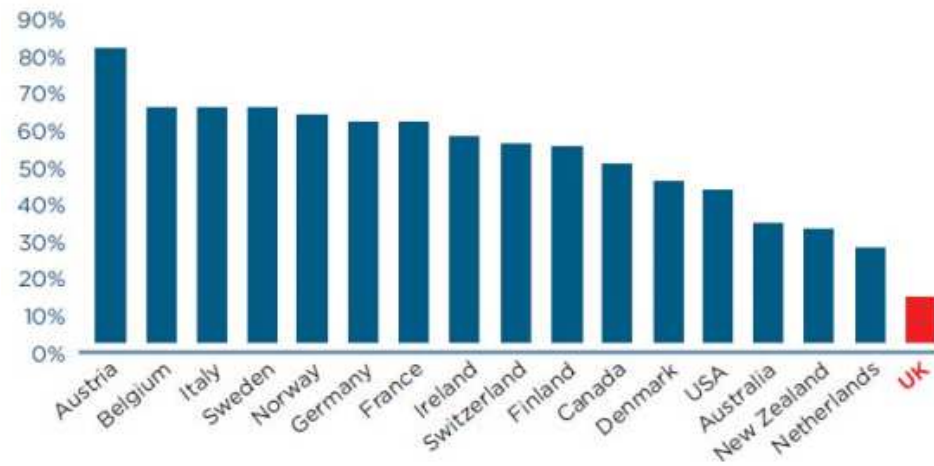
- in **Self Build** the home-owner takes overall responsibility and initiates the plot finding, design and even the build **themselves**, a daunting process for those without experience.
- in **Custom Build** the home-owner still controls the making of their own home with much of the hard work done by a specialist, called an enabler who reduces the risks from the process. The enabler initiates the process by sourcing the land and then provides the home-owners with various options and services in relation to fully-serviced plots. This includes designs, planning permission, specification as well as the construction; taking the sweat out of building your own home.

Crucially with the Lived In model the **home-buyer purchases the plot directly from the landowner**, thereby cutting the middle-man (the developer) out of the process, making savings and taking control of their home.

In this way, Custom Build is able to provide the advantages of Self Build to a larger portion of the population. Everyone can do their own little 'grand design'.

"The Government is committed to taking steps to 'fix the broken housing market' by supporting Custom Build homes with greater access to land and finance, giving more people more choice over the design of their home"

*Fix our Broken Housing Market – DCLG  
– White paper 2017*



Proportion of all homes delivered by self build – illustration taken from 'An Action Plan to promote the growth of self build housing' report 2011

# Why we need to fix housing in the UK...

We are **not building enough** new homes in the UK and many of those that are built are of poor quality. The St Albans 2016 Draft Plan is committed to building 436 homes a year and included a total of 4,000 homes in the Green Belt.

Part of the reason for this is that the UK Housing Market is dominated by a few big players. Whilst we currently rely on them to deliver the numbers we need, unfortunately there are many **drawbacks** to the 'speculative business' model they use. This model can have detrimental effects on those who live in the developments and communities nearby:

- **Land scarcity** is seen as an opportunity for profit. Instead it should provide an incentive to take extra care in optimising our precious resources.
- Developments are **financially driven** even though housing supply should be based on **need**.
  - the speculative model is beholden to **financial efficiency**
  - so care and good design tend to be **sacrificed** to save costs.
- The **end-user** is seen as a **product consumer** rather than a **home-owner** with individual needs:
  - the buyer's **choice** is totally restricted in all regards: design, plot size and specification, all for efficiency's sake
  - the house-buyer has **no input into the design** of their homes which are inevitably barely fit for purpose
- **Placeless**: one-size-fits-all developments create monotonous and uninspiring places to live, they could be anywhere and have no sense of identity.
- **Poor quality** and rarely provide value for money.

- 300,000 new build houses a year target set in the Budget 2017

- 153,000 new build house completions' in year to June 2017

- 50% of all UK homes are built by 10 companies (25% are built by just 3 companies)

- Austria: 80% of new homes are Self + Custom Build

- UK: 10% of new homes are Self + Custom Build

"Speculative housing is built to sell, rather than to live in"

*Alastair Parvin*



a typical **Speculative Development**, somewhere in the UK.

# ... by looking at alternative housing models

Even if the landowner or the developer wanted to make decisions for the good of the end-user and the local community, the business model works against them. (The landowner is no longer in control of their land, and the developer is lumbered with crippling financing costs and a need to complete quickly.)

So it is the **model that is broken** and the developers just work within it. As encouraged by the DCLG White Paper we should consider other ways to build a better housing market.

Programmes like *Grand Designs* have helped demonstrate other routes to home-ownership and have grown the demand for something better; homes that are conceived not just with **more care** and **more choice** for the buyers, but also with higher quality design values.

So if Self/Custom Build are attractive options, why are only 10% choosing these routes? The evidence shows that there is **huge demand**, but there are various barriers to overcome:

- Speculative developers have a **land-supply monopoly**
- **Planning** and **construction** processes are complex and risky (especially for the inexperienced)

How Custom Build helps solve these problems is explained overleaf...

"53% of the population would like to [undertake] a self build project...this means there could be, on average, about 20,000 people in every borough researching how to build, and 2,000 people keen to take active steps to commission their own home." *NaCSBA*

"In all the years I have been reporting on people who want to build their own homes I've never seen so much interest, excitement and action as there is right now. A survey conducted earlier this year suggested there are now six million people in Britain who would like to commission their own house" *Kevin McCloud*

"According to successive Ipsos MORI polls, more than one million people across the UK expect to buy a building plot, secure planning permission or start/complete construction work on their new home.; Plotsearch has more than 100,000 live subscribers; and Rightmove has an average of 400,000 monthly searches on land." *Fix our Broken Housing Market - DCLG - White Paper 2017*





Community Custom Build, Cotswolds

# How Custom Build Works

## ... the 3 elements of the **Lived In** way:

### 1. Home-buyers purchase their plots directly from the landowner

- A **shared long-term interest** in the Land leads to better long-term decision-making for the greater good (as opposed to more superficial options which may be financially driven)
- **Shared savings:** cutting out the short-termist profiteers from the process, there is considerably more value left for the Landowner to improve the setting and for the buyer to build their personalised home.

### 2. Improved design and more choice

Custom Build places emphasis on the quality of home design with a sensitive approach to site and place-making. Expert Enablers help the Landowner provide the Home-Buyers with build-ready plots including:

- **Planning Permission** - Houses types/ size etc driven by local need and designed by top architects with inspiring designs to encourage committed occupiers to build strong communities.
- **Design Code** - To give flexibility for buyers but within carefully controlled parameters
- **Landscaping** - Carefully designed settings incorporating community-building amenities to genuinely enhance land use for the new and existing community including cycle paths, parks and allotments.

### 3. Facilitated construction to ease the building process:

- **Services and Infrastructure** - All utilities are pre-installed at the plot so it is 'ready to build'
- **Manufacturers** - Buyers use their own contractor or choose between a selection of market-leading sustainable housing manufacturers (pre-priced and ready to hone the design and build to fit the buyer's bespoke specification)

In this way Landowners do not sell to the highest bidding developer but instead work with planners and the community to craft new neighbourhoods. The emphasis is different, focusing on building communities rather than profits.

"69% of people say the quality of what is built near them is more important than the quantity."

*RIBA Future Homes Commission Report, 2012*

"Self-builders don't just build a home, but create sustainable communities; putting down deep roots and moving on average only once every 25 years compared to the national average of once every 6 years."

*Ted Stevens, 2013 REF*



Self-Build house, Gloucestershire featured on Grand Designs 2017

Photography by Charles Hosea

# With Custom Build Everyone Wins

## ...except Speculative Developers

Many landowners want to do the right thing in terms of developing homes sustainably for their community and creating a genuine legacy for all. However, until now they felt their only option was to sign with the most lucrative promoter.

Custom Build allows them to sell directly to the end-user allowing them to retain the land and make better choices for its future. This leads to a series of beneficial outcomes for each and every stakeholder throughout the housing ecosystem:

- **Home-owners:**
  - More affordability - Custom Build can save money and increase value
  - Bespoke: build the house that exactly fits as no two people are the same
  - Build something to be proud of
- **Land owners:** know and care about their land and the local community far more than any national developer and therefore have an urge to do the right thing. Custom Build allows them to:
  - Have more control of the destiny of their land (to fit theirs and the community needs)
  - Leave a legacy
  - Enjoy an improved financial return
- **Local and wider community** - see overleaf

"There are a lot of landowners who want to do the right thing, and they like the idea of telling their grandchildren 'we did that'; instead they face this impossible wall of difficulty - planning. Eventually a developer comes along and says I can make this disappear with one cheque: and they end up in the wrong place even though they wanted to do the right thing. So we need to make an environment where it's easier to do the right thing than the wrong thing."

*Richard Bacon MP*

"The Government has also taken steps to raise the profile of self-build through a series of measures including easing constraints in the planning systems, cutting taxes for self build developments, providing a number of funds to assist individuals and communities to self build, and by releasing public land for self build projects."

*AMA's Self-build Housing Market Report – UK 2016-2020 Analysis*



Model of Custom Build scheme 2016 by Lived•in

# Benefits to the Local and Wider Community of St Albans

Not only are there direct benefits to the buyer and landowner, but just as importantly there are tangible gains for the wider community:

- 1. Landscape benefits:** With the landowner in control of the planning application, due to a stronger connection to the land they are generally more willing to off-set some of their windfall by 'giving back' to the locality in the form of amenity donations. These can include allotments, new footpaths and public access parkland. Good design can lead to improved landscape rather than loss.
- 2. Employment benefits:** Custom Build construction is geared towards **local** businesses and **SMEs** who have suffered as the big companies have grown. SMEs bring local benefit as well as innovation, diversification and higher build quality.
- 3. Local economy:** Custom Build developments are keen to build sustainable communities so they are more likely to incorporate business opportunities into a site (offerings such as a village shop, pub and shared office space etc.)
- 4. Sustainable:** Designs based on actual need; Self Builders care more about ecocredentials and tend to stay longer (reducing the waste from refurbishments)
- 5. Better communities:** Combining all the employment, landscape and sustainability issues together with the extra care and commitment self-builders put into their homes will lead to the growth of sustainable neighbourhoods encouraging safer, stronger and happier communities.

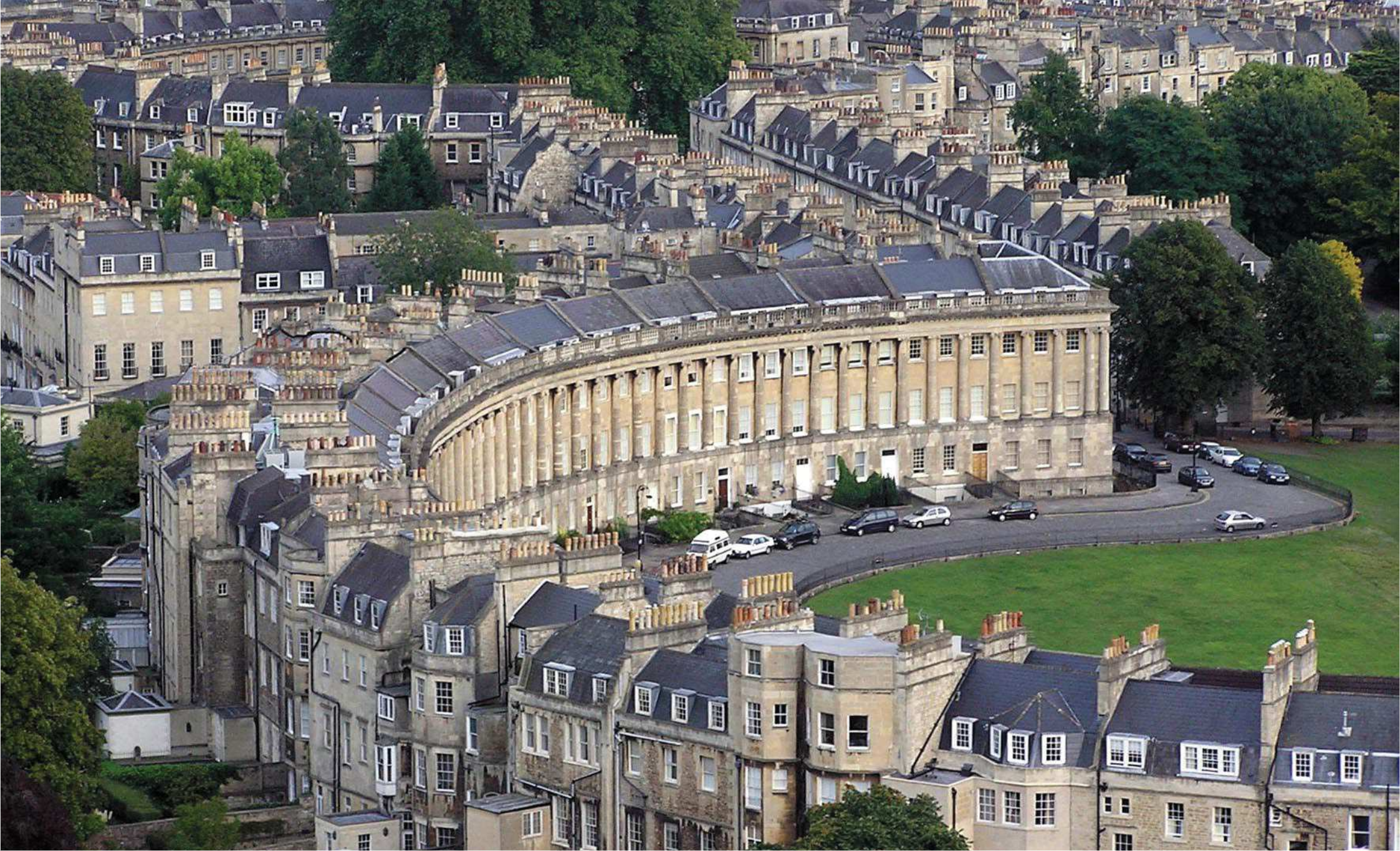
"... each self-built home spends around £50,000 on materials and supports an average of seven construction jobs for a year"

*Ted Stevens - Chair of the National Self Build Association*

"Custom built homes are generally built more quickly and to a higher quality than other homes." *Fix our Broken Housing Market – Department for Communities and Local Government, White paper 2017*

"...this Government truly sees the potential in the self-build market to help families realise their aspirations to create jobs and support small businesses and to make a real contribution to meeting our housing needs now and in the future."

*Secretary of State for Communities and Local Government*



Did you know the Royal Crescent in Bath was a Custom Build project?

# An Innovative Vision for Better Housing & Communities

## ...But This is Not a New Idea

**Innovative but nothing new** - much of our Georgian and Victorian urban landscape was built following a Custom Build method including the Royal Crescent in Bath. Amsterdam's famous 17th Century canal houses were also built this way and our rural villages also grew and evolved like this. Land was purchased from landowners and houses were built as the need arose providing the origins of sustainable development.

So rather than being a new invention, it's the **rediscovery** of something we have always done. In between we have lost touch with but can importantly regain:

- **A sense of place:** Buildings that reflect the area and people - a genuine contemporary vernacular
- **A sense of achievement:** Homes that homeowners and their communities can be proud of building, creating a legacy for future generations
- **An organic evolution:** As a result of this individual and organic process, the character of each home and neighbourhood evolves gradually in response to the needs of the owners as always used to be

With this rediscovery we can **recalibrate** housing whilst improving the **quality** and **affordability** of our homes. We can also bring back **a sense of belonging**.

"But hang on... surely people have been self-building since time immemorial? Yes, they have. Medieval hovels were constructed by peasants out of locally available materials (we call this vernacular nowadays)... And thus it has been through the millennia. Right up until the midtwentieth century when housing corporations and developers arose and almost entirely took over the provision of housing in a planning environment that favoured them and squeezed out the enterprising self-builder. (I'm writing about England; elsewhere in the world self-build has continued to flourish.)"

*Kevin McCloud*



# Some examples of Custom Build across the UK

## **Graven Hill, Bicester** *Oxfordshire*

Cherwell District Council acquired a 187 hectare site in 2014

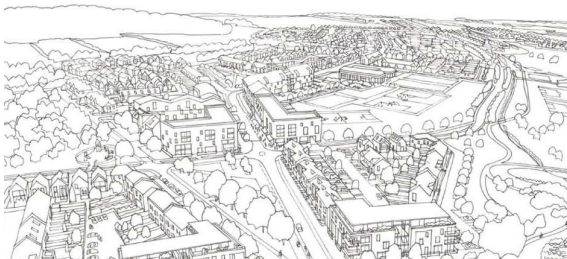
### **1,900 Custom Build homes**

One of the largest private homebuilding developments in Europe which included a primary school, community hall and local shops as well as 100,000m<sup>2</sup> of commercial space, a pub, sports pitches, play areas, allotments and a renewable energy centre.



**Design Code**

© 2014 TOWN AND TRIVSELHUS



## **Marmalade Lane,** *Cambridge*

A co-housing community being delivered by TOWN and Trivselhus.

### **42 Custom Build homes**

Complemented by first-class shared facilities, it will be a place of neighbourliness and community spirit



## **Tresham Garden Village,** *Northamptonshire*

One of 14 Garden Village projects that the Government is supporting.

### **300 Custom Build homes**

At least 20% of the 1500 homes will be Custom Build



# What Can Custom Build Offer St Albans?

## Land West of Bathwood Drive

### Housing

The St Albans 2016 Draft Plan committed to building 436 homes a year and included a total of 4,000 homes in the Green Belt. The Government now says the authority needs to build 913 homes a year which would mean about 9-10,000 homes in the Green Belt.

Custom Build is able to provide a **variety of types of accommodation** according to need including: Self Build Affordable housing, small first-time buyer homes, family homes and downsizer homes.

### Custom Build Register

The **Right to Build** part of the **Self and Custom Build Housing Act 2015** requires local authorities to ensure there is adequate land provision for those who want to build their own home and to maintain a register of them. Authorities have a rolling three year deadline in which to respond to the level of demand established in the registers.

By April 2017 on the St Albans Custom Build Register, 254 people had registered as looking to buy a serviced plot (this will have since risen). The land at Bathwood Drive could help provide a large proportion of these with good access to the centre of St Albans

“Relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area...Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and working with custom build developers to maximise opportunities for self build and custom housebuilding.”

*Ministry of Housing, Communities & Local Government” Self-build and custom housebuilding Guidance” 1 April 2016*

## Education

Infrastructure: Local need has been identified for a primary school and Site o22 has been shortlisted in the *"Primary school site search report, St Albans" March 2016 HertsCC*

## Green Space

Infrastructure: Proposals for **parks**, allotments, playing fields

## Neighbourhood

Infrastructure: Shops and other **community facilities**

"The overall conclusion is that the site is of more than sufficient size to accommodate a new primary school and is likely to be in single ownership, which is an advantage. Although it is outside the Core Area it is only just outside the boundary and so is relatively well located relative to the area of greatest need. It is also slightly detached from nearby houses which would help to reduce the impact on residential amenities, which is an advantage."

*Primary school site search report, St Albans" March 2016 On behalf of Hertfordshire County Council*

**Cambridge office**

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[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]  
E mail: [REDACTED]  
Our ref: DF/200802

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 West of Batchwood Drive, St Albans**

Strutt & Parker are instructed by Gorhambury Estates Company Limited, in relation to St Albans City & District's Local Plan 2020 - 2038 Call for Sites. We understand that site suggestions put forward will be used to inform the preparation of the new Local Plan 2020-2038 and will be considered in the Council's Housing and Economic Land Availability Assessment (HELAA). This call for site submission relates to Land West of Batchwood Drive as set out at Figure 1.

Whilst it is understood that the Council will take account of the sites already included in the Strategic Housing Land Availability Assessment (SHLAA) this submission provides an up to date assessment of the site, the current circumstances and justification for its inclusion in the new Local Plan 2020-2038. This letter should be considered in conjunction with the accompanying information:

- Call for Sites – Site Identification Form;
- Site Location Plan;
- Land off Batchwood Drive, St Albans: Review of Constraints and Opportunities (Alan Baxter);
- The Case for Custom Build (LIVIDIN); and
- Primary School Search Report – St Albans (VINCENT + GORBING).

The land is being promoted by a single landowner, as a mixed use development site, including market and affordable housing, potential land for a primary school, extensive open space and custom build housing. As set out in the accompanying Alan Baxter Site Appraisal document, the site could deliver between 100 and 120 new homes. In addition, it should be noted that the site has also been considered by Hertfordshire County Council (HCC) for a primary school and is on the edge of the optimal area of search, available and suitable for development. Initial positive discussions were held back in 2018 with HCC regarding the suitability of this site for a primary school, however, it will be necessary for the site to come forward as a mixed use allocation in the new Local Plan given its current Green Belt designation.

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.





Figure 1: Site Location Plan Land West of Batchwood Drive, St Albans

## 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, such as our clients' site at land adjacent to Batchwood Drive.

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 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.

**Call for Sites Submission**

**Land West of Batchwood Drive, St Albans**

The site comprises an area of approximately 8.8 ha on the north-western side of St Albans. It is located west of Batchwood Drive. The enclosed document ‘*Land off Batchwood Drive, St Albans: Review of constraints and opportunities*’ (prepared by Alan Baxter) sets out further details of the site, which is being promoted as a mixed use development to include the delivery of private and affordable housing (100 – 120 units), a possible area of land for a primary school and extensive areas of public open space. The site includes the scope to provide a 2.4 ha site for a new primary school, and 2.4 ha for public open space, which equates to 50% of the overall site. In addition, it is proposed that Custom Build housing is included as part of the residential mix.



**Figure 2: Illustrative Layout and Design Principles**





It is important to note that the 2.4 ha of public open space can be considered 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. In the event the land was not required for a school the open space land could be expanded by an additional 2.4 ha further enhancing these compensatory benefits. These are issues that the Gorhambury Estate are firmly committed to the delivery of, in the same way that they are committed to the delivery of high quality, inclusive, sustainable custom build housing, along the lines set out in the accompanying document *'The Case for Custom Build'* (LIVEDIN).

### **Provision of New Primary School**

The site has been considered previously, by Hertfordshire County Council (HCC), as part of its search for a site to accommodate a new primary school in order to meet existing demand and pressure for primary education within St Albans. The County Council has carried out a search for new primary school sites. It reviewed 145 potential primary school sites and has narrowed this to a short-list of seven sites to be progressed through the Local Plan. A copy of the *'Primary School Search Report – St Albans'* (VINCENT + GORBING) prepared for Hertfordshire County Council has been enclosed.

Site O22, Land west of Batchwood Drive, is one of the shortlisted sites. It comprises land measuring an area of 2.4 ha, which can be made available early on for this purpose. This will enable the swift delivery of much needed school capacity to meet the existing shortfall within St Albans. In this regard, the application site has already been assessed by HCC as a potentially appropriate site for the new primary school, given its very good relationship with the City development boundary. The landowners have confirmed that they would be supportive of the provision of a new school within the application site, in conjunction with the delivery of the residential development. The report prepared by Alan Baxter, which has been appended to this representation shows the proposed suggested location for the primary school towards the west of the site.

The provision of a new primary school, is strongly supported by paragraph 94 of the NPPF, which states that great weight should be given to the need to create, expand or alter schools through the preparation of plans. This is in recognition of the importance of ensuring that there is a sufficient choice of school places available to meet the needs of existing and new communities. In this regard, the applicants would be happy to work with HCC and St Albans City & District Council to facilitate the early delivery of the primary school on the site, if it is required to be delivered ahead of the adoption of the emerging Local Plan.

The County Council's assessment of the site can be found enclosed with this submission. It concludes that the site is adjacent to the optimal area for a primary school, available, and relatively unconstrained when viewed against the six alternatives. The location is adjacent to the core area of the search and, therefore, well placed to serve the catchment area where there is an educational need.

This representation seeks the removal of this land from the Green Belt, as a smaller, sustainable site. The assessment and the accompanying Alan Baxter report suggest ways in which the site could be developed without impacting the views of the City Centre skyline. An assessment of archaeology will be carried out as required at the appropriate stage. In terms of site access and highway implications, HCC's assessment is accompanied by a specific analysis, which concludes that: *'there appears to be reasonable potential for this site to be able to accommodate a school.'* In the event that this land was no longer required by HCC for a primary school or other educational purpose, then the land would be used as an expanded open space, increasing the contribution towards compensatory environmental improvements to the Green Belt, biodiversity gains and carbon offsetting which the site would make.

### **Custom Build**

In addition to the above considerations, the site is suitable for development by those wishing to commission their own home, as encouraged by the NPPF which requires local authorities to:

*'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).*  
(Paragraph 61, NPPF)

This is supported by legislation, 'The [Self-build and Custom Housebuilding Act 2015 \(as amended by the Housing and Planning Act 2016\)](#)' that includes a requirement to keep a self-build and custom housebuilding register and the duty to have regard to the register. It goes on to add that:

*'Local planning authorities should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources (as outlined in the [housing and economic development needs guidance](#)), when preparing their [Strategic Housing Market Assessment](#) to understand and consider future need for this type of housing in their area. Plan-makers will need to make reasonable assumptions using the data on their register to avoid double-counting households.'*

Paragraph: 011 Reference ID: 57-011-20160401

Revision date: 01 04 2016

Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include, amongst others:

- *'developing policies in their Local Plan for self-build and custom housebuilding;*
- *engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and*
- *working with custom build developers to maximise opportunities for self-build and custom housebuilding.'*

Paragraph: 025 Reference ID: 57-025-201760728

Revision date: 28 07 2017

We believe the Council will need to positively plan for self-build and custom build development and, as such, include suitable sites or a proportion of sites as allocations to meet demand.

A developer, specialising in the delivery of self-build sites has expressed an interest in the site, the subject of this Call for Sites submission, of which the land owner is supportive. The model proposed would have advantages, including the points below:

- It avoids standard house type that do not meet the needs of the end-user and landowner and allows for bespoke design. Clearly this will raise design standards in line with the requirements of the NPPF and the emphasis in the recent Planning White Paper, Planning for the Future (August 2020) which places a significant emphasis on planning for beautiful and sustainable places.
- It offers more control and flexibility to the landowner allowing it to accommodate estate / community / heritage issues; and to phase the development as necessary.
- It enables a legacy to be built in: owner-occupiers build better homes than developers would, i.e. they care more, which combined with better master planning, results in better communities.

Please refer to the enclosure '*The Case for Custom Build*' (LIVIDIN) with this submission for further details on Lived-in and its design ethos which our client is firmly committed to. This site would have the ability to substantially assist the City & District Council with meeting their requirements for self-build.

## **Public Open Space**

The proposed public open space to the west side of the development will provide a number of benefits and is significant in scale. It will provide good access to public open space both for new residents and the existing

population of St Albans. It also has the opportunity to provide a children's play space and provide a spill out space adjacent to the Primary School. Locating the open space in this location will also ensure that views to the Cathedral are protected, and will allow for the strong defensible boundary to the south of the application site. Together these can be considered 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. There may also be the potential to consider further opportunities for compensatory environmental improvements to the Green Belt, biodiversity net gains and carbon offsetting, off site on other nearby land owned by the Estate.

### **Strategic Housing Land Availability Assessment**

The site was previously considered under the SHLAA (2016 Update) (Site ref. SHLAA-GB-SA-405). The site was not, at that time, deemed to be suitable for development. However, it is considered the assessment at the time was very generalised and actually not based on a thorough assessment of the supporting information submitted with the original Call for Sites submission.

In conclusion the site was rejected for the following reason:

*"The site makes a crucial contribution to Green Belt purposes. Development of the site would affect land that is presently rural, would result in encroachment into open countryside and be visually intrusive from the surrounding area. It would cause demonstrable harm to the character and amenity of surrounding land."*

However, it should be noted that the SHLAA was not an assessment of the sites performance against the purposes of the Green Belt set out in paragraph 134 of the NPPF and the only Green Belt assessment which had been undertaken was not sufficiently detailed or up-to-date to reach such a conclusion.

It is understood that the Council will be undertaking a new Housing and Economic Land Availability Assessment (HELAA) and it is essential that this process is sufficiently robust to ensure that the supporting information submitted with this Call for Sites submission is properly and fairly appraised, to determine the sites suitability. Importantly, the site is not the subject of any of the following designations or constraints:

Area of flood risk; SSSI; Ancient Woodland; Local Nature Reserve; County Wildlife Site; Site of Geological Importance; Scheduled Ancient Monument; Ground contamination; Identified Site for Local Preservation (archaeological); Proximity of Locally Listed Building(s); Proximity of Listed Building(s); Historic Park or Garden; Air Quality Management Area; Conservation Area; Proximity to Hazardous Installations (as per Policy 84b); Public Right of Way; Utilities – e.g. electricity substations, pylons, telecom masts, underground pipelines, sewers etc; Identified Minerals and Waste Site; Adversely Affected by Noise, Air or other forms of pollution (e.g. major roads etc); Affect the Watling Chase Community Forest Objectives; Loss of high quality agricultural land (Grades 1,2 or 3a); A Protected Green Space; Landscape Character; Site with social or community value; or Subject to Tree Preservation Orders.

Access can be gained with minimum alterations to the surrounding highway network as set out in the accompanying appendix to the 'Primary School Search Report – St Albans' (VINCENT + GORBING) prepared for HCC, enclosed with this submission.

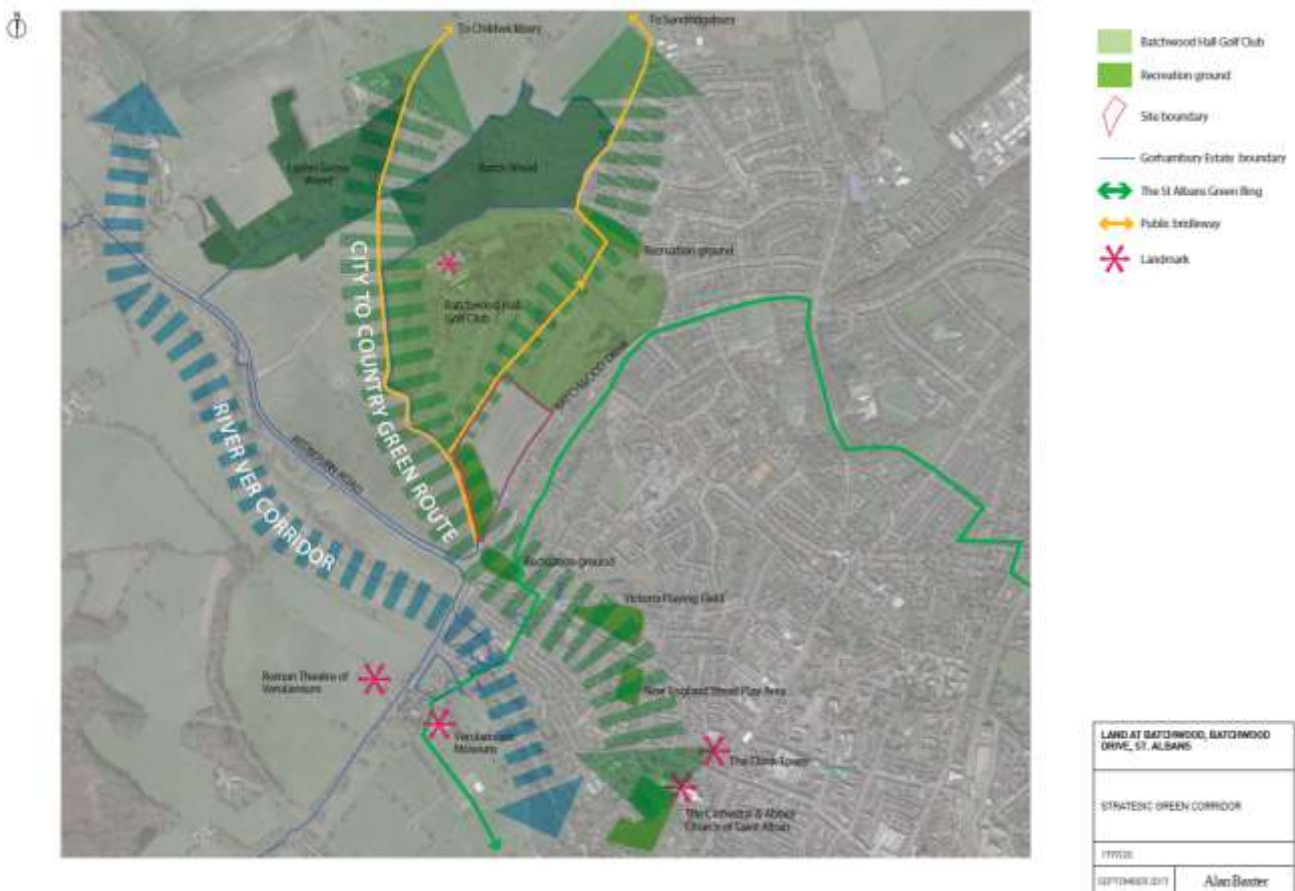
The site is in one of the most sustainable locations in the District. It is located on the eastern side of the town of St Albans, the District's main settlement, and a key focus for growth in the terms of the settlement hierarchy in any new local plan. The site is approximately 1.2km from the town centre and approximately 2km from the railway station. Whilst both these destinations would be within reasonable walking distance, there are also bus stops located in Batchwood Drive outside the site with frequent services. The sustainability of the location with good access to the public transport network, is a factor which is also emphasised in the accompanying Primary School Search Report with the site lying on the edge of the core search area. The proposed mix of uses, extensive open space provision along with the inclusion of custom build units further emphasises the sites sustainability credentials.

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 therefore can make a positive contribution towards meeting the Council's acute housing needs.

**Green Belt Assessment**

The original Green Belt Study only really considered sites at the strategic level. The site, the subject of this representation, fell with sub area GB23. This was one of the larger areas lying between St Albans and Harpenden. The report assessed that this area contributes significantly towards three of the five purposes of the Green Belt. The site was not, considered when the detail of the study was reviewed. 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 Land at Batchwood Drive, which benefits from a strong landscape buffer and defensible boundary to north. The land rises to the north, where the golf course is located with the housing in the New Greens area beyond. It is therefore considered that the site could be delivered in isolation, without significant impact on the openness of the Green Belt.

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. Considered on its own merits, the site would make a logical extension of the settlement, and while it is separated from the existing New Greens development to the north by the intervening golf course, it forms a logical southern extension of the settlement edge. The existence of the golf course, site topography, bridleway network and established boundary planting all contribute to reinforcing this edge, which would then logically link with Batchwood Drive to the Redbourn Road junction, and valley of the River Ver to the south as can be seen from Figure 3 below.



**Figure 3: Overview of Sites Strategic Location**

The assessment below has considered the site performance against each of the criteria set out at paragraph 134 of the NPPF:

**a) To check the unrestricted sprawl of a large built-up areas;**

Having regard to the development suggestions set out in the accompanying Alan Baxter document when considered against this criteria, given the topography of the site, its existing hedgerow boundaries, the network of bridleways and adjoining golf course, it is considered the site would represent a natural infill in the landscape context of this part of the edge of the settlement. To the north of the golf course, the northern side of Batchwood Drive has already been breached by the New Greens residential area, development of this site to the south of the golf course is considered to represent an appropriate continuation of this urban edge of St Albans with the golf course providing a green link into the settlement. The site would be contained by the aforementioned defensible boundaries to the north and the valley of the River Ver to the south. As such there would be no harm to this particular Green Belt function.

**b) To prevent neighbouring towns merging into one another;**

The site is located on the north eastern side of St Albans. The closest neighbouring settlements of Harpenden, Redbourn and Hemel Hempstead lie to the north and west respectively. These are some considerable distance from the site (in excess of 4km) and the urban edge of St Albans and separated by predominantly undeveloped countryside. The valley of the River Ver and the A5183 are situated to the north-west of the site. Further west is the M1, which further reinforces the Green Belt separation between these adjoining settlements. The modest development associated with the site the subject of this call for sites submission would not give rise to any potential issues of coalescence.

**c) To assist in safeguarding the countryside from encroachment;**

Immediately to the north of the site is the Batchwood Golf Course and Sports Centre, beyond which is the residential area of New Greens, the consequence of which is that the wider countryside and openness of the Green Belt is not appreciable to the north and north-west of the site. Effectively, the site, whilst in agricultural use, sits within the setting and context of the town with which it has a stronger relationship than the wider surrounding countryside to the north, west and south. New Greens has already breached the north-western side of Batchwood Drive and it would seem logical that its western edge could continue south across the golf course to include the site. The existence of the golf course, site topography, bridleway network and established boundary planting all create strong defensible boundaries. To the south the valley of the River Ver and the southern side of Redbourn Road establish a notably different context and character. As such, given these surrounding land uses, the site is not perceived as forming part of the wider countryside beyond the settlement. Any change to its character as a result of development would be considered to represent a minimal level of harm in the planning balance. The site does not perform a functional countryside role which is important to preserve, or which makes any significant contribution to the openness of the Green Belt.

**d) To preserve the setting and special character of historic towns; and**

As set out in the accompanying Alan Baxter document it is considered that the scheme can be sensitively designed to protect important historic views of the Cathedral and thereby preserve the setting and historic character of the town. The Conservation Areas lie to the south of the A5183. Views from the Conservation Areas are restricted by existing trees and planting, and the impact may be minimised by the proposal to include public open space on the southern area of the site. This has been a key consideration of the Initial Constraints and Opportunities Plan, prepared by Alan Baxter Associates, which has sought to protect views to and from the Cathedral and safeguard the setting of the Conservation Areas located to the south of the Redbourn Road and Verulam Road which lie to the south of the site.



**e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

While the development of this particular site may do little to encourage urban regeneration other than perhaps by the provision of a new primary school, there is a firmly established need for the release of Green Belt sites to meet the District's acute housing crisis. Development of this particular site would not result in any harm to urban regeneration or discourage the recycling of derelict or other urban land.

Accordingly, when this site is considered against the five purposes of the Green Belt, demonstrably it does not make any particular or remarkable contribution to any of the relevant criteria. There is an established essential need to identify suitable Green Belt opportunities to meet the Council's acute housing needs in this particular case. The nature of the development, associated benefits of a site for a primary school and expansive open space, should be considered sufficient evidence and justification to demonstrate the exceptional circumstances necessary for the site to be released from the Green Belt.

**Summary**

The allocation of this site and its subsequent development could bring significant positive social, economic and environmental benefits. It can provide a site for a much needed primary school and significant public open space, reinforce the urban edge and integrate development into the landscape with low impact on views from the wider countryside and surroundings. It will also assist the Council in meeting their objectively assessed housing needs and acute demand for both market and affordable housing. The proposed mix of uses, extensive open space provision, along with the inclusion of custom build units, further emphasises the sites sustainability credentials and it can be delivered quickly without the need for any significant infrastructure upgrades.

The site is in a sustainable location with good access to public transport on the edge of the Town of St Albans, the District's largest settlement. St Albans will be a key focus for growth in the terms of the settlement hierarchy in any new local plan. The site is approximately 1.2km from the town centre and approximately 2km from the railway station. Whilst both of these destinations would be within reasonable walking distance, there are also bus stops located in Batchwood Drive outside the site, with frequent services. The sustainability of the location with good access to the public transport network, is a factor which is also emphasised in the accompanying Primary School Search Report with the site lying on the edge of the core search area.

The site is under the control of a single landowner, the Gorhambury Estate, who have considerable wider land ownership in the surrounding area. For the Estate, the legacy associated with a development such as this is a key driving factor and, as such, they truly desire to see an exemplar, high quality, sustainable development of the site. The inclusion of an extensive area of open space which will allow biodiversity net gains, compensatory environmental improvements and landscape enhancements are all in line with the Estate's ethos. As are the social benefits of including land for a new school and facilitating the delivery of custom build plots. The quality of design is high up on the Government's agenda as set out in the recent Planning White Paper; the Estate fully support the requirement to deliver high quality, sustainable and beautiful places. Furthermore, there may also be the potential to consider further opportunities for compensatory environmental improvements to the Green Belt, biodiversity net gains and carbon offsetting, off site, on other nearby land owned by the Estate.

As set out above, the loss of this small portion of the subarea of the Green Belt would not have any significant negative impacts on the overall role of the Green Belt in this particular location. Considered in the context of the surrounding land uses, the site is a logical continuation of the edge of the settlement, well contained within the existing topography with defensible boundaries. The District's acute need for housing along with the economic, social and environmental benefits are clear justification for the exceptional circumstances required to bring the site forward as an allocation in the new Local Plan 2020 – 2038.

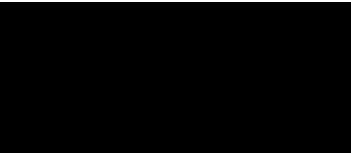
For the reasons set out above we would request that the Council gives serious consideration to the development opportunities this particular site has to offer. It would be a sound allocation that is fully justified in planning terms.



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.

If you have any queries in relation to the above, please do not hesitate to contact me.

Yours faithfully



**David Fletcher**  
**Director**  
**Strutt & Parker**

Encs.

Land off Batchwood Drive, St Albans  
Review of site constraints and opportunities  
Prepared for the Gorhambury Estate  
October 2017







# Land off Batchwood Drive, St Albans

## Review of site constraints and opportunities

### Prepared for the Gorhambury Estate

### October 2017

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# 1.0 Introduction

This report summarises the findings of an initial review into the constraints and opportunities relating to land owned by the Gorhambury Estate, to the west of Batchwood Drive, St Albans.

The site is approximately 8.8 hectares in size and presents an opportunity for new homes, public green space and community facilities.

# 2.0 Constraints review

## 2.1 Designations

An initial review of the adopted Local Plan has identified that the following designations and policies apply to the site (a full review of existing and emerging policy is to be undertaken by Strutt and Parker):

Saved Policies from The St Albans District Local Plan Review, 1994:

- **Policy 1 Green Belt** designation
- **Policy 111 Archaeological Significance**, sites where planning permissions may be subject to a recording condition
- **Policy 104 Landscape Conservation Area – Gorhambury**, areas of landscape with regional or County level value.
- **Policy 114** St. Albans City Centre, Building Height, Roofscape & Skyline, site lies within a **Zone of Visibility**.

Subject to the tests for Green Belt release being met, Policies 104 and 114 potentially place additional restrictions on development.

Policy 104 states that '*...the Council will not grant permission for any development that would adversely affect the high landscape quality. Permission will be granted only for development proposals which pay regard to the setting, siting, design and external appearance. Landscape improvements will normally be required when development is permitted.*'

Policy 114 has a potential impact on permitted building heights within the site. The Policy reads '*...Within the Zones of Visibility ...proposals shall not obscure or detract from views of the historic roofscape of the Building Height Control Zone.*'

Based on information held on MAGIC.gov.uk, the site does not appear to contain any protected wildlife habitats. The government's Flood Map for Planning reveals that the site is located within Floodzone 1 and has a low probability of flooding (less than 1 in 1000 annual probability of river or sea flooding).

## 2.2 Primary School Site Search

Hertfordshire County Council's report 'Primary School Site Search Report, St Albans', updated January 2017 is of relevance to the site. The report:

*'...summarises the results of a study which has been undertaken on behalf of Hertfordshire County Council to identify and assess potential sites for a new 2FE primary school to meet primary educational needs in the central area of St Albans.'*

Site O22 – The land west of Batchwood Drive, which comprises the lower part of the client's site, has been short listed as one of seven sites which are potentially most suitable for accommodating a new primary school.

As part of the report, the following appraisals were prepared for the site:

- Planning Appraisal Report including development principles (prepared by Vincent and Gorbings)
- High Level Accessibility Appraisal (prepared by Stomor Civil Engineering Consultants)
- Transport Assessment (undertaken by Pell Frischmann).

The Report raises a number of issues:

1. The site is located within the Green Belt and has a strong, clearly defined boundary. In order to justify further development within the site, it is necessary to demonstrate there are no alternative non Green Belt sites available to accommodate the new school.
2. The school would need to be a single storey building to minimise the impact on the views.
3. Steeply sloping topography suggests the development of the site has to be terraced (this would affect any archaeology).
4. Trees fronting the Batchwood Drive have to be retained to minimise the impact on the Green Belt.

We are not aware of the current status of the study or whether the site is still being considered by HCC and St Albans.

## 2.3 Site conditions

The site is currently arable farmland bounded by hedgerows / trees to the north and west beyond which is a Council owned golf course. The eastern boundary onto Batchwood Drive has an intermittent hedgerow and trees which sit on a raised bank. Generally, the site is up to 2 metres above the level of Batchwood Drive, with the difference reducing in the northern and southern corners of the site. The southern boundary is a lane (name unknown) which is one-way only for vehicles, giving access onto Batchwood Drive, and a public bridleway.

Bus stops are located adjacent to the site on Batchwood Drive.

Within the site, topography rises to 110 metres above sea level, giving views over the residential streets of St Albans towards the Hospital. The south-western part of the site has attractive views towards the Abbey and over open countryside towards Roman Verulamium.



- Highest and flattest part of the site
- Existing leisure
- Recreation ground
- Green buffer
- Site boundary
- Potential zone for additional vehicular access
- Potential to reconfigure junction to provide two-way site access
- Potential for pedestrian access
- Opportunity to retain planting/ partially screen development
- Green Belt and Landscape Conservation Area
- Potential to connect to existing public bridleways
- Existing public bridleway
- Wide ranging views towards Abbey and Roman Verulamium
- Views towards residential rooftops and St Albans City Hospital
- Least visually sensitive part of the site
- Steeply sloping area
- Bus stops
- 1m contours
- Existing frontage
- Embankment

<b>LAND AT BATCHWOOD, BATCHWOOD DRIVE, ST. ALBANS</b>	
SITE CONSTRAINTS & OPPORTUNITIES	
1797/20	
SEPTEMBER 2017	Alan Baxter



Batchwood Drive properties dating from 20th century



Recreation ground to the east of Batchwood Drive



Views towards residential rooftops and St Albans City Hospital



Views towards Roman Theatre Verulamium



Existing one-way road to the west of the site



St Michael's Church of England single form entry primary school



Traditional buildings within the St Albans Conservation Area



<b>LAND AT BATCHWOOD, BATCHWOOD DRIVE, ST. ALBANS</b>	
SITE CONTEXT	
1797/20	
SEPTEMBER 2017	Alan Baxter

# 3.0 Opportunities

The broad opportunities identified are initial ideas, intended to generate discussion about the potential for the site to offer both high quality new homes and wider community benefits. The character and mix of uses within the site will be refined and developed in discussion with the Council and the local community.

## 3.1 Strategic Green Corridor

The strategic green corridor diagram sets the site within the context of a network of green spaces connecting the city centre into the countryside and Batch Wood. Taking advantage of views to the Abbey and the existing bridleways there is potential to strengthen the connection into the countryside by providing new public open space (around 2.4 ha) in the southern part of the site. This could accommodate formal play provision, community gardens, and a viewpoint. New footpaths through the green space and wider site would tie into the wider green corridor approach.

## 3.2 Design Principles

The design principles plan overleaf, identifies the proposed broad land use mix. We have assumed that the main element of development on the site will be residential, for which we propose to dedicate around 4.0 Ha of land in the lower but steeper part of the site. This part of the site is the least visible from the wider city centre.

If we assume residential net densities of between 25 – 30 dwellings per hectare (which is generally achievable with a mix of semi-detached, detached and some small runs of terrace homes), this would deliver between 100-120 homes. It may be safer to assume the lower number, given the complication of the steep topography.

The character and layout of the residential development could take a number of different approaches with an emphasis on delivery high quality homes, which are distinctive to St Albans. This should be the subject of further discussion with the Council. For example:

- Streets and buildings arranged to follow the traditional urban typologies of the St Albans Conservation Area, with small runs of terraces, mixed with detached properties and built using locally distinctive materials.
- Innovative, modern architecture with exemplary energy performance such as Passivhaus, which offers something distinctive within St Albans.

Given the level difference between the site and Batchwood Drive, and to minimise the visual impact of development on the properties on Batchwood Drive, we propose to retain the existing mature trees and hedgerow at the site boundary as far as possible. New homes would be set back behind this and served either via a lane to the front or from the rear.

The highest, most visible and flattest part of the site could be offered for community use, potentially a primary school (2.4 ha) with a green roof, forest pre-school, allotments, scouts/guides or further open space.

## 3.3 Access

The steeply rising topography is a consideration in locating the primary access point(s).

There are two options: to provide an access to the site directly from Batchwood Drive (location is subject to further analysis of level differences) or to reconfigure the existing one-way road and junction at the southern end of the site to provide two-way site access. Both options require further testing.

In addition, pedestrian access points would be created connecting the site to Batchwood Drive.