

KEY

- SITE BOUNDARY
- EXISTING TREES & HEDGES
- PROPOSED TREES & LANDSCAPING
- GRASS
- EXISTING TREES TO BE REMOVED
- PUBLIC RIGHT OF WAY
- PROPOSED PARKING SPACE WITH AN EXTRA ONE IF REQUIRED

PROPOSED PARK HOMES

- PROPOSED UNIT
50 X 20FT (15.24m x 6.1m)
5 No.
- PROPOSED UNIT
45 X 20FT (13.72m x 6.1m)
4 No.
- PROPOSED UNIT
40 X 20FT (12.19m x 6.1m)
1 No.

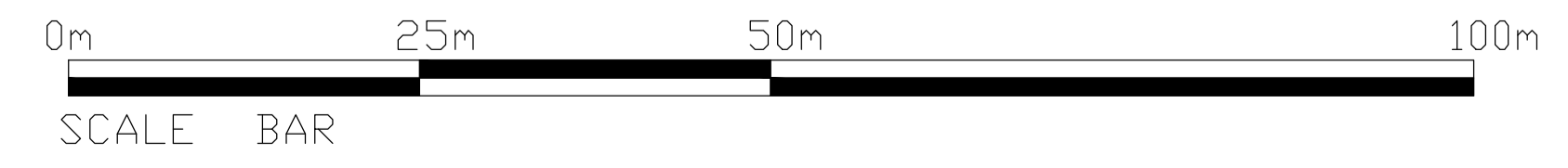
TOTAL PROPOSED UNITS - 10 No.

REV	DESCRIPTION	DATE	INITIAL
B	AMENDMENTS TO PLAN	04.03.21	MY
A	AMENDMENTS TO PLAN	26.02.21	MY

Bratherton
PARK DESIGN CONSULTANTS
 Waverton House • Bell Meadow Business Park
 Pulford • Chester • CH4 9EP
 T. 01244 853 000 • F. 01244 570 054
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WATFORD PARK

MASTERPLAN PLAN B



DRAWING RECREATED BY BRATHERTON PARK DESIGN OS
 Licence/Customer Account Number (100006866)

DATE • 20.04.2020	SCALE • 1/500 @ A1
DRAWN • MY	REV • B
	DWG NO. • 1384.1.1

Our ref: PPS1573 Ragged Hall Lane

20 Western Avenue
Milton Park
Abingdon, Oxfordshire
OX14 4SH
T +44 1235 821 888

Date: 05th March 2021

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

Dear sir/madam,

Call for sites submission – Land at Ragged Hall Lane, Chiswell Green

On behalf of our client, Sir Martin Holderness, we hereby submit the above mentioned site to the St Albans call for sites (SHLAA) consultation.

This covering letter should be read in combination with the completed call for sites proforma which provides a technical overview of the site to ensure the site is considered comprehensively as part of the present Housing Land Availability Assessment.

The land is being put forward as an immediately available site to accommodate approximately 10 residential park homes to contribute to the supply of market affordable housing at Chiswell Green.

The site is well located within easy access to local services and amenities with convenient access to public transport which provides frequent access to higher order services within the area. The site benefits from considerable highway frontage, connectivity to adjacent PRoW, and also benefits from connectivity with utilities and infrastructure to service the site. The site is immediately available, deliverable and achievable.

Planning policy

The current adopted Local Plan is The District Local Plan Review 1994 (Adopted 30 November 1994) Saved and Deleted Policies Version (July 2020). Any policies not on the saved policies list have time expired and no longer form part of the development plan. With St Albans recently withdrawing their new Local Plan from examination, the council has reverted to their old Local Plan thus placing a reliance on outdated policies from the 1990s.

Due to the reliance on out of date policies and assumptions for meeting housing growth and need, this therefore places further doubt on the delivery of adequate housing and forces development decisions to be based on this outdated Local Plan.

National Planning Policy Framework (February 2019)

The NPPF is the Government's statement of planning policy and guidance which provides the basis against which development plan policies and development control decisions should be made. The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, and at its heart is a presumption in favour of sustainable development.

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Paragraph 8 clarifies that in order to achieve sustainable development the planning system must act to reach overarching aims of social, economic and environmental objectives. Each objective is interdependent and need to be pursued in mutually supportive ways to secure net gains across all three objectives to achieve sustainable development.

Paragraph 11 advises that Plans and decisions should apply a presumption in favour of sustainable development. Section c) of paragraph 11 states that for decision-taking this means approving development proposals that accord with an up-to-date development plan without delay and, where the development plan is out of date, Councils should grant planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or the application of specific policies suggest otherwise.

Chapter 5 seeks to address delivering a sufficient supply of homes.

Paragraph 63 sets out that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site.

Paragraphs 60 and 61 indicate that housing need assessment must be carried out using the standard method in the national planning guidance and take into account the type, size, tenure and needs of different groups.

Paragraph 64 requires major development involving the provision of housing is proposed, decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement include where the site or proposed development is exclusively for affordable housing (criterion d).

Paragraph 67 requires policy making authorities to have a clear understanding of the land available in their area. From this assessment planning policies should identify a sufficient supply and mix of sites taking into account suitability and likely economic viability to identify a supply of deliverable sites for within 1-5 years of the plan period, and developable sites for years 6-10 and 11-15.

Paragraph 68 recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, and that these are often built-out relatively quickly.

Paragraph 73 requires local planning authorities to annually identify and update, as a minimum, a five-year supply of housing at specific deliverable sites, which meet the housing requirements set out in the adopted strategic policies. A suitable buffer for the housing supply must also be demonstrated, this being either:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the LPA wishes to demonstrate a five year supply of deliverable sites through an annual position statement; or
- c) 20% where there has been significant under delivery of housing over the previous three years (where delivery below 85% of the housing requirement set out in the Housing Delivery Test)

Paragraph 77 of the NPPF states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Paragraph 78 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

In terms of rural housing, **Paragraph 78** states:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”
It is noted that the site is located adjacent to an area where residential properties already exist, alongside other, non-residential uses within the rural area. Therefore, there is clear potential for the

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proposal to help maintain and enhance the vitality of the local community through the provision of affordable, market housing on the site.

Paragraph 103 relates to sustainable transport modes and seeks the promotion of developments that are focused on locations which are or can be made sustainable and offer a genuine choice of transport modes. This aim goes hand in hand with the principles set under Paragraph 118d) which says that planning decision should “*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively*”.

Paragraph 117 promotes the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 118 criterion D develops this point by stating that planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

Whilst the NPPF has been updated twice since it was first published in 2012, the general policy direction with regards to older people planning remains broadly unchanged. The NPPF maintains the policy that specifically identifies ‘older people’ as one of the key household groups whose needs should be considered in the preparation of plans. It states that,

“...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)...” (NPPF, para 61)

It goes on to define ‘older people’ as comprising,

“People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs...” (NPPF, Glossary)

Therefore, national policy clearly recognises that the needs of specific groups encompasses a range and diversity across housing but also the households concerned, especially within the older people’s group.

The ‘Housing for Older and Disabled People’ Planning Policy Guidance (PPG) (26 June 2019) has a section dedicated to providing guidance on how the need for older people’s housing should be considered in the planning process. In response to the first question: (“Why is it important to plan for the housing needs of older people?”) the opening sentence of the guidance on planning for older people states,

*“The need to provide housing for older people is **critical**...”*

And goes on to state in response to the same question,

*“People are living longer lives and the **proportion of older people in the population is increasing**. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. **Offering older people a better choice of accommodation to suit their changing needs** can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, **an understanding of how the ageing population affects housing needs** is something to be considered from the early stages of plan-making **through to decision-taking**....”*

On tackling for the needs of disabled people, the PPG is clear on the role planning in this pursuit,

“The provision of appropriate housing for people with disabilities, including specialist and supported housing, is **crucial** in helping them to live safe and independent lives... **An ageing population will**

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see the numbers of disabled people continuing to increase and it is important we plan early to meet their needs throughout their lifetime.”

The PPG also now provides specific guidance on how the housing requirements of older (and disabled) people can be determined. The PPG identifies a range of data sources that could help do this, stating that,

“The age profile of the population can be drawn from Census data. Projections of population and households by age group can also be used. The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people. Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can also be useful. The assessment of need can also set out the level of need for residential care homes.”

The PPG goes on to define further the different types of specialist accommodation for older and disabled people. Whilst recognising that the types of provision as outlined does not constitute an exhaustive list, the PPG does nonetheless seek to define the range of provision in some detail. Based on the PPG definitions, the different types of specialist housing designed to meet the diverse needs of older people can include;

- Age-restricted general market housing (generally for active over-55s);
- retirement living or sheltered housing;
- ‘extra care’ housing or ‘housing-with-care’ (in some cases, these developments are known as ‘retirement communities’ or ‘retirement villages’; residential care homes and nursing homes (based on based spaces rather than individual dwellings, and can also include dementia care homes).

Therefore, the PPG recognises the significant amount of variability in the types of specialist housing for older people, driven predominantly by the differing levels of care that is required as people grow older. The list above provides an indication of the different types of housing available, but is not definitive, stating that,

“Any single development may contain a range of different types of specialist housing.”

In terms of how planning should consider making specific provision for specialist housing for older people, the PPG states that,

“Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate...Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, **or to move to more suitable accommodation if they so wish.**”

One notable exception in terms of clarification set out in the PPG 2019 is a lack of any further advice on how to apply the Use Classes Order with respect to specialist accommodation (under Use Class C2) leaving this task to each Local Planning Authority to apply to each case in turn. The PPG states,

“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, **consideration could, for example, be given to the level of care and scale of communal facilities provided.**”

RPS highlights the final part of the response as providing some useful guidance on those matters that could potentially assist applicants in the preparation of specific proposals that seek to respond the local needs in the older population cohort. Furthermore, in determining proposals that seek to address a local need in the area, decision makers should take into account the following guidance when assessing planning applications for specialist housing for older people, as stated in the PPG,

“Decision makers should consider the **location** and **viability** of a development when assessing planning applications for specialist housing for older people...**Where there is an identified unmet**

need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need”.

Ensuring Housing Delivery and Land Supply

The NPPF requires Local Planning Authorities (LPAs) to maintain an up to date supply of housing land to be delivered over a 5-year period, this is known as 5 Year Land Housing Supply (5YHLS). It is apparent from the Council's updated Annual Monitoring Report (AMR) 2019 (March 2020) 5-year land supply requires the supply of **2,021 dwellings** during the period 2019-20 to 2023-24 which the Council is presently failing to meet, and therefore failing their obligations under the NPPF. The Council's 5-year housing supply is based on two separate methodologies, they are as follows:

'Approach 1 - The Government's consultation proposals within the 'Technical consultation on updates to national planning policy and guidance method' published on 26 October 2018, sets out a standard methodology for the calculation of local housing need. It gives an outcome for the District of an average of 896 new households / dwellings per annum;

Approach 2 - The 2014 based household projection figures were published by the Department for Communities and Local Government (DCLG) on 12 July 2016. They identify for the District a household projection, which can be taken as indicating local housing need of an average of 640 new households / dwellings per annum for the period 2019-2029.'

The Council updated its 5-year land supply schedule from using these methods and considered that at a baseline date of 1 April 2019 and including the relevant 20% buffer, there is approximately:

- 1) NPPF Standard Methodology: Five-year land supply at 896 new dwellings per annum + 20% Buffer = **1.9 years**
- 2) 2014-based ONS Household Projections: Five-year land supply at 640 new dwellings per annum + 20% Buffer = **2.6 years**

This housing supply reveals the severity of under delivery of housing within St Albans. The Council are unable to meet the required rate of delivery by a significant amount. Whilst a park home is considered sui generis under the Town and Country Planning Act 'Use Classes Order', their delivery can still contribute to the Council's housing land supply. In our opinion, given that the proposal seeks the provision of housing, within the context of a recently submitted new Local Plan it is submitted that all further contributions to towards meeting the District's inadequate 5YHLS should be considered beneficial to the Council to meet their housing supply whilst also working to address unmet need in the absence of any new housing allocations.

In addition to this, Housing Delivery Test Results were published by the Secretary of State on 19th February 2019. The Council scored 58% and in response to this, the Council has produced this Housing Delivery Test Action Plan, responding positively to the challenge of increasing its housing delivery. This figure is considerably short of the 95% requirement and therefore showcases that there is a specific need to identify areas for housing.

However, the Council's LHNA states that the 'identified need for affordable home ownership properties equates to around 30% of the overall housing need' (4,043 per annum). In examining the cost for low-cost home ownership products, the preferred approach in this report is to set out a series of affordable purchase costs for different sizes of accommodation. These are set out in table 47 of the LHNA as a range with the bottom end being based on equivalising the private rent figures into a house price so that the market sale price will meet the needs of all households in the gap between buying and renting. The upper level is set based on the estimated lower quartile price to buy a market home. Setting higher prices would mean that such housing would not be available to households for whom the Government is seeking to provide an 'affordable' market option.

The LHNA sets out that for market housing, households currently have an element of choice but with worsening affordability, this causes families to buy smaller homes than they might traditionally have been expected to do. To give an example, paragraph 6.100 sets out that 'a middle-income household might previously have sought a 3-bedroom semidetached home. However, worsening affordability and stricter

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lending practice might now mean that such households will only be in the market for say a 2-bedroom flat'. With a limited amount of supply and a high demand for housing in St Albans this therefore shows the prevalent issue of market affordability and the effect of limited incoming housing supply may restrict residents from moving up the property ladder whilst economically active, but may also require the over 55s demographic cohort to downsize to a more affordable market housing product in anticipation of financial constraints associated with their retirement.

The Councils LHNA states that 'bungalows are often the first choice for older people seeking suitable accommodation in later life and there is generally a high demand for such accommodation when it becomes available'. Park homes are extremely similar to bungalows as they are single storey detached home (bungalow-style) that are set in a private estate, where they are situated on standard plots also referred to as pitches. Externally and aesthetically, there is very little difference in appearance between a residential park home and a traditional bungalow as parking and amenity space is provided in accordance with caravan model standards. Park homes are perfect for age restriction as they can accommodate the requirements of older occupants who may have reduced mobility.

Based upon a review of the Councils own evidence base including the LHNA, there is clearly considerable potential in St Albans amongst existing households to downsize to smaller properties, when new smaller units are delivered thus releasing larger stock for families and other household looking to access a new home. This is particularly evident amongst those owner occupiers in the older age group cohort, who are more likely to own their homes outright, providing an opportunity for downsizing to properties that better suit their needs in later years.

Suitability of the site

The site is being promoted to this call for sites consultation as an available, achievable and deliverable site for residential development in the form of up to 10no. residential park homes as a market affordable housing product. The land is put forward to this call for sites as an immediately available site to deliver much needed homes to met unmet need. The site benefits from connectivity with all services and amenities to facilitate development, and there are no constraints to delivery.

Park homes are designed for permanent living and are a cheaper market affordable product due to the lower construction costs compared to conventional homes, thus addressing the prevalent issue of affordability within St Albans. Furthermore, as park homes are cheaper to purchase, this will allow the occupants to have additional disposable income which can be used in the local area, when compared to purchasing an open market bungalow.

Although the site is not located within the defined settlement boundary, the site can meet much of the criteria set out in policy 4 (new housing development in towns) due to its location adjacent to the settlement boundary of Chiswell Green and proximity to St Albans.

As the whole edge of settlement site will be age restricted this will be similar to a small retirement complex which will attract the older residents. This therefore produces a secure and safe residential area with a like-minded community of senior residents whilst providing the convenience of nearby services, amenities and public transport infrastructure. The delivery of this type of age restricted community may also help to combat elderly loneliness and isolation which negatively affects physical and emotional wellness.

It is recognised that the site is located outside of the confines of a named settlement in Policy 2 within the St Albans Local Plan; however, it is our view that the proposal for park home bungalows on this sustainable edge of settlement site provides a suitable and deliverable location for the proposed dwellings in accordance with policies within section 3 of the Local Plan relating to housing by virtue of its pedestrian connectivity and access to bus services via nearby bus stops provides access to higher order services in larger towns including Luton, Watford and St Albans. As such, it is our view that this site should be considered favourably as part of this call for sites consultation as an available site to deliver market affordable housing.

The existing connectivity with services and infrastructure within Chiswell Green offers residents access to multiple modes of sustainable travel, thus reducing their dependency on car journeys. Consequently, whilst

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being located outside of the settlement boundary, the location does allow access to sustainable modes of transport and pedestrian connectivity to local services within Chiswell Green to meet day to day needs, and further afield for higher order services.

The proposal are considered sustainable in terms of social, economic, and environmental benefits by making the efficient use of this sustainable site by delivering an attractive scheme comprising much needed smaller market affordable homes to meet an identified housing need for the identified age group cohort where the benefits of the scheme outweigh any harm to planning policies or the Green Belt.

In conclusion the site is located within a sustainable location adjacent to the settlement boundary with the capability to deliver much needed market affordable housing within the 1 – 5 year period of the Local Plan. The site is immediately available and is demonstrable as an achievable and deliverable site for housing to meet the tests set out within the Local Plan.

Yours sincerely,
for RPS Consulting Services Ltd



Sophia Thorpe MRTPI
Director and Residential Lead - Planning
sophia.thorpe@rpsgroup.com
01235437142

Comment

Consultee [REDACTED] (1265180)
Email Address [REDACTED]
Address [REDACTED]
Event Name Call for Sites 2021
Comment by [REDACTED] (1265180)
Comment ID CFS9
Response Date 02/03/21 07:14
Status Submitted
Submission Type Web
Version 0.1
Files Plot 19 Ragged hall lane

Name
[REDACTED]

Address
[REDACTED]
[REDACTED]
[REDACTED]

Postcode
[REDACTED]

Telephone
[REDACTED]

Email
[REDACTED]

Your interest . Site Owner

Site address/location (Please provide a map showing the site boundary)

Plot 19
Ragged Hall Lane
Chiswell Green
Hertfordshire

Site area (in hectares)

0.0728

Site Location Plan Attached

No

Upload GIS Shapefile(s)

Plot 19 Ragged hall lane
Plot 19 Ragged hall lane

Land ownership (please include contact details if known)

As above

Current land use

Green belt

Condition of current use (e.g. vacant, derelict)

Vacant

Suggested land use

Housing

Reasons for suggested development / land use

In residential area

Likely timescale for delivery of suggested development / land use

1-5 Years

Contamination/pollution issues (previous hazardous land uses)

No

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

No

Flood Risk

No

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

No

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

No

Legal issues (For example, restrictive covenants or ownership titles affecting the site) No

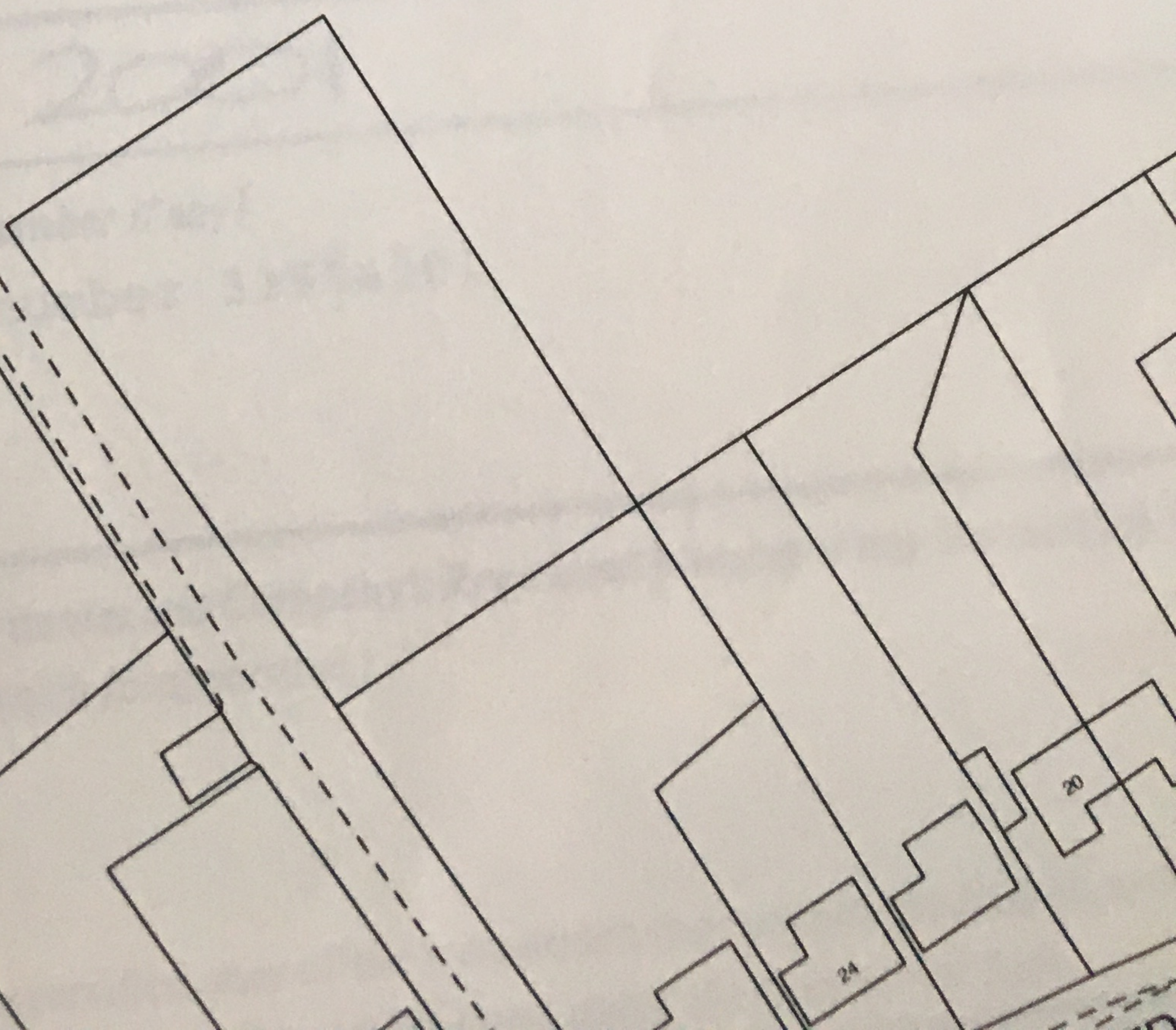
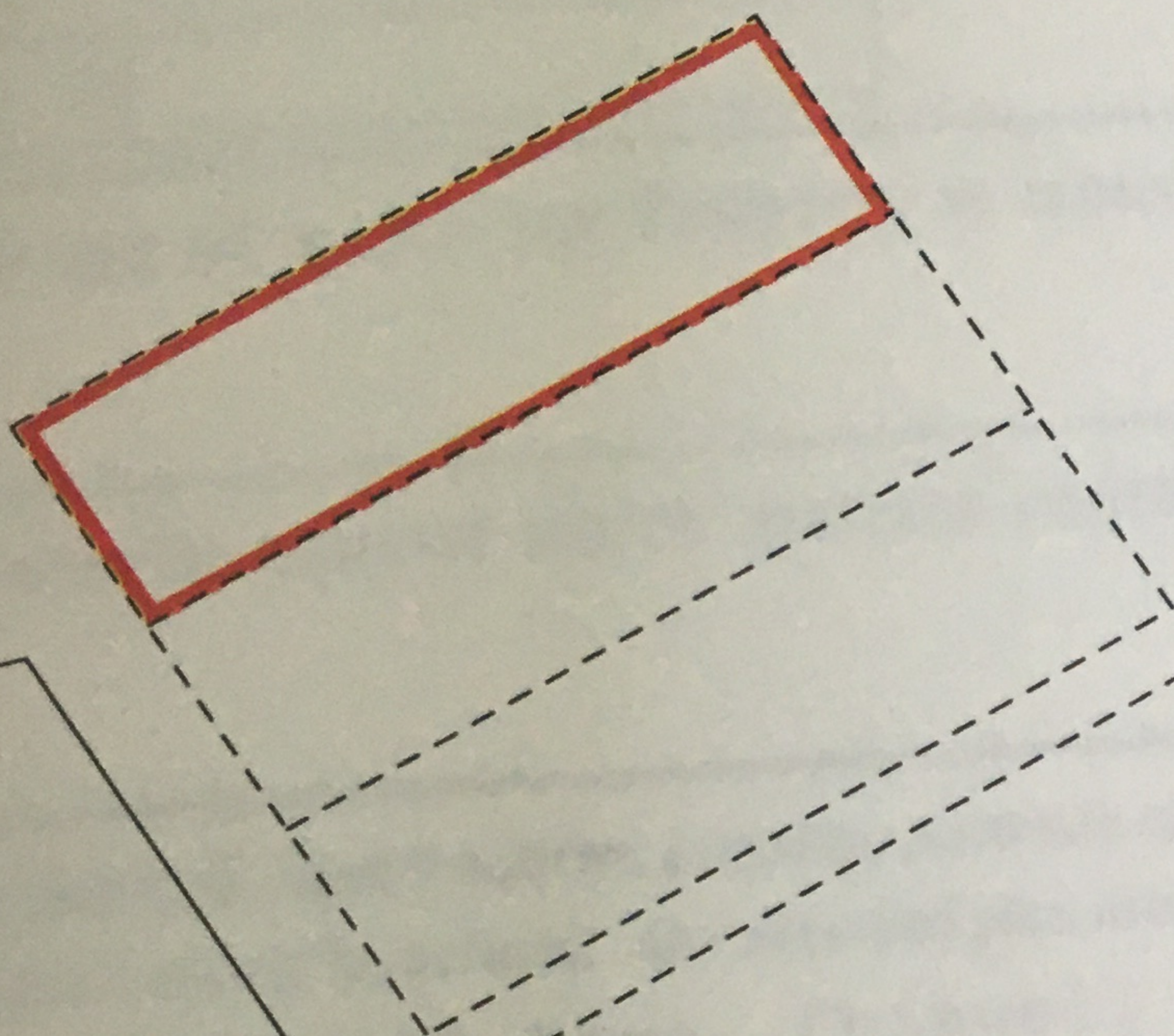
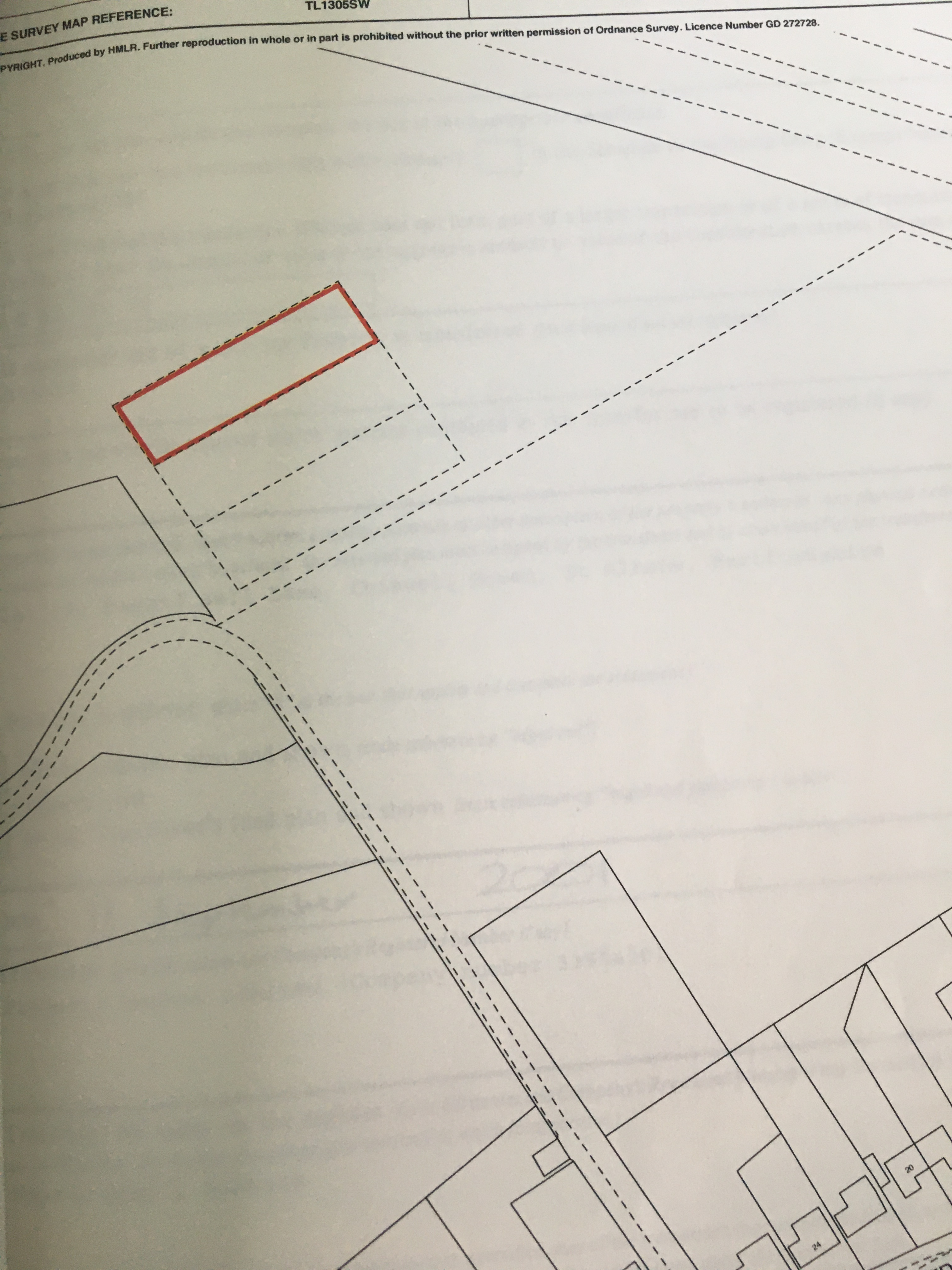
Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site? No

If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable

Private road

Other constraints affecting the site No

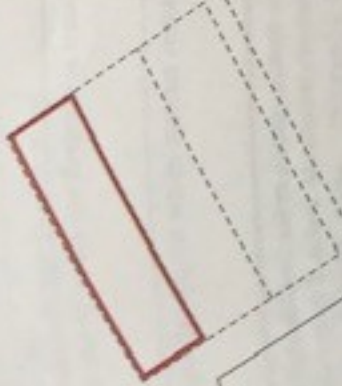
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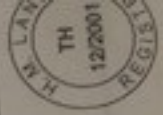
24

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ACE SAFETY MAP REFERENCE:
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RAGED H&M LANE



SCALE 1:1000
DATE 1988



LR

FIELD NUMBER

MD-452793

IDENTIFICATION OF SUBJECT

N. 10000

SCALE 1:500

DATE 1988

BY J. H. ...

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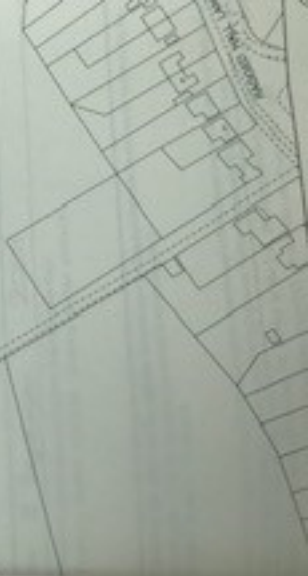
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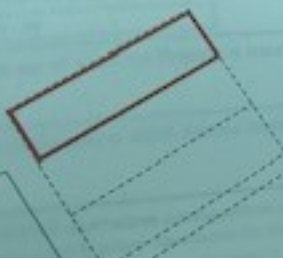
HERTFORDSHIRE : ST ALBANS

SOURCE SURVEY MAP REFERENCE:

TQ 10405W

SCALE 1:1000

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Comment

Consultee [REDACTED] (863044)

Email Address [REDACTED]

Address

[REDACTED]
[REDACTED]

Event Name

Call for Sites 2021

Comment by

[REDACTED] (863044)

Comment ID

CFS6

Response Date

27/02/21 15:17

Status

Submitted

Submission Type

Web

Version

0.1

Name

[REDACTED]

Company/Organisation

n/a

Address

[REDACTED]

Postcode

[REDACTED]

Telephone

[REDACTED]

Email

[REDACTED]

Your interest

. Local Resident

Site address/location (Please provide a map showing the site boundary)

Salisbury Tennis Club,
Salisbury Avenue,
St. Albans,
AL1 4TZ

Site area (in hectares)

approx. 0.20

Site Location Plan Attached

No

GIS mapping shapefile attached (in .shp file format)

No

Land ownership (please include contact details if known)

Salisbury Tennis Club

Current land use

Tennis Club

Condition of current use (e.g. vacant, derelict)

In use as a small tennis club

Suggested land use

Housing

Reasons for suggested development / land use

Ideal site for housing development, being in an established residential area. All services close by. Level and flat. Suitable for a minimum of six substantial residential dwellings or more, smaller dwellings. Many other tennis clubs/facilities within the local area to fulfill demand so the impact of developing this site would be minimal.

Likely timescale for delivery of suggested development / land use

1-5 Years

Contamination/pollution issues (previous hazardous land uses)

No

Environmental issues (e.g. Tree Preservation Orders; SSSIs)

No

Flood Risk

No

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

No

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

No

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

No

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

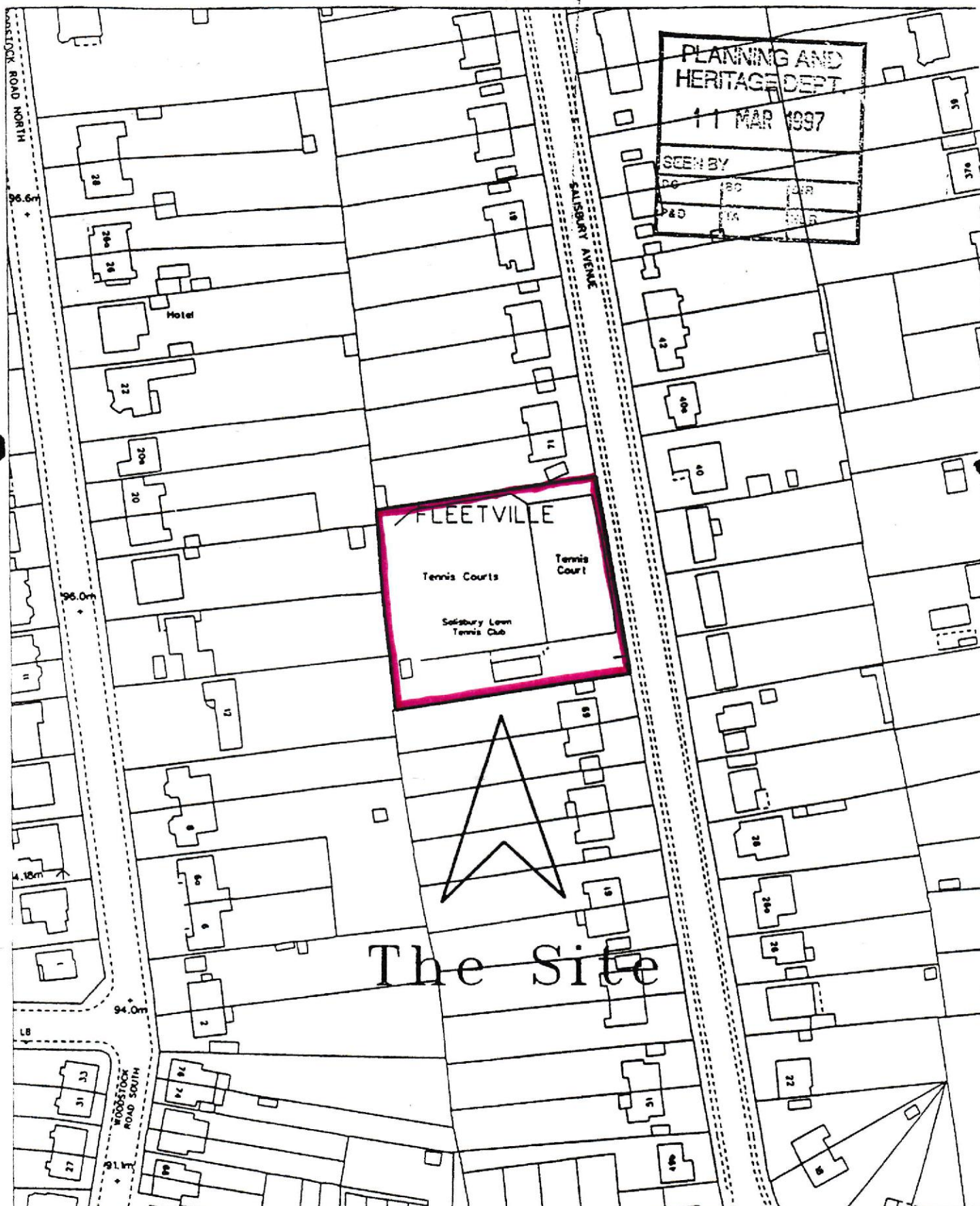
Yes

Other constraints affecting the site

No

Planning Status

. Planning Permission Not Sought



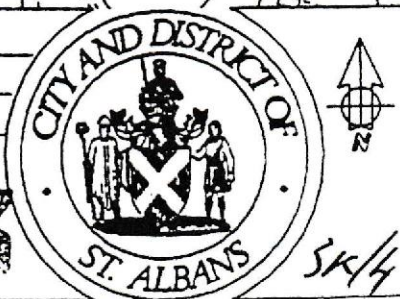
PLANNING AND
HERITAGE DEPT
11 MAR 1997
SEEN BY
P&D

The Site

TITLE Salisbury Lawn Tennis Club, Salisbury Ave, St Albans
 REF No. SCALE 1: 1250
 DRAWN JCM DATE 11/03/97 PLAN NO.

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NOTES
 E 10710587



By email to planning.policy@stalbens.gov.uk

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

8 March 2021
My Ref: 20/217

Dear sir/madam,

**RE: ST ALBANS LOCAL PLAN 2020-38 – CALL FOR SITES
LAND AT SEWELL PARK, HARPENDEN ROAD, ST ALBANS (SHLAA-GB-SA-77)**

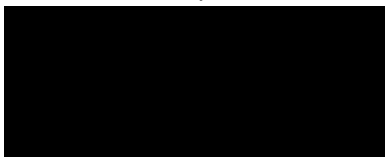
I write in response to your Call for Sites in association with the new Local Plan covering the period 2020-38.

You will be aware of the status of the above site in relation to the SKM Green Belt Review and the previous draft Local Plan and the extensive masterplanning discussions that were held. You will also be aware of the recent planning application that was submitted that is awaiting a Council decision.

The purpose of this letter is to reiterate that the site is available and still being promoted for development.

I would welcome the opportunity to discuss this site with you in due course. In the meantime, please do not hesitate to contact me if you have any queries.

Yours faithfully



Simon Andrews
Strategic Planning Manager

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.

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

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

Your Details	
Name	Rob Turner
Company/Organisation	Network Rail Infrastructure Limited
Address	1 st Floor, Baskerville House, Centenary Square, Broad Street, Birmingham
Postcode	B1 2ND
Telephone	██████████
Email	████████████████████
Your interest	<input checked="" type="checkbox"/> Site Owner <input type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

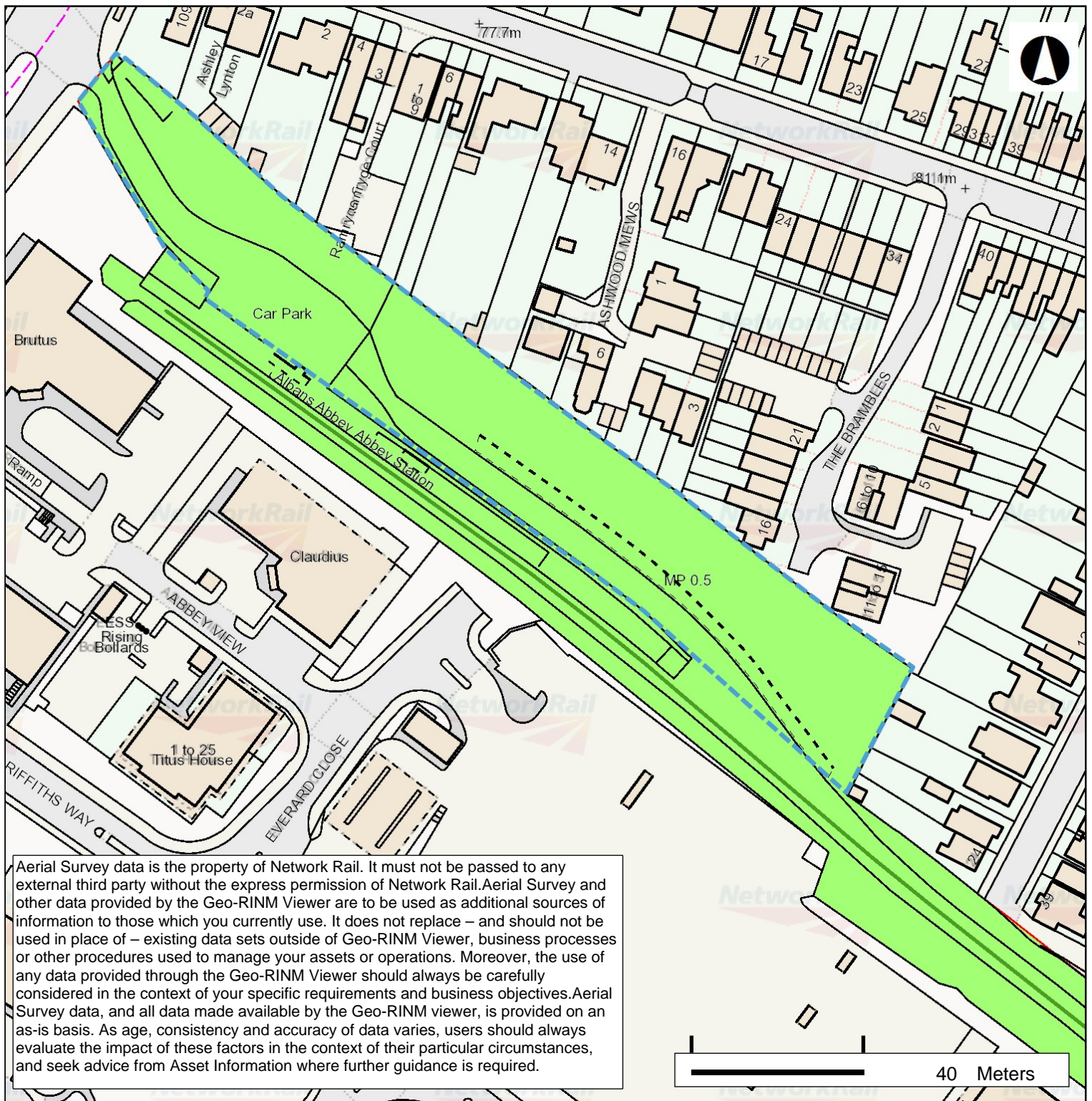
Site Details					
Requirements:	<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 				
Site address/location (Please provide a map showing the site boundary)	St Albans Abbey Station, off Station Approach roadway, A5183 Holywell Hill, St Albans AL1 2AY				
Site area (in hectares)	0.6332 ha (gross)				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td>514578</td> <td>Northing</td> <td>206390</td> </tr> </table>	Easting	514578	Northing	206390
Easting	514578	Northing	206390		
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)	Network Rail Infrastructure Limited own the freehold land shown coloured green on the attached plan. The site is shown by the broken blue line.				
Current land use	Vacant woodland, station, station car park and access roadway, Network Rail railway maintenance access.				
Condition of current use (e.g. vacant, derelict)	Part vacant part station and operational railway land				
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	The land comprises vacant woodland, station access road and car park. Network Rail is seeking to provide additional housing to help towards DfT housing targets. This site is adjacent to a public transport corridor and in conjunction with new housing could provide station improvements.				

Likely timescale for delivery of suggested development / land use	<input type="checkbox"/> 1-5 Years <input checked="" 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Topography affecting site (land levels, slopes, ground conditions)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	<input checked="" type="checkbox"/> Yes (If yes, please specify – site is heavily wooded and in a conservation area. Network Rail has a vehicular access for railway maintenance across the site but this can be varied. Part of the site forms the station access road and car park so revisions may be necessary as part of any master plan for the site development) <input 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	Development will be subject to railway and regulatory approvals and if necessary passive provision for any future railway projects	

Development



Aerial Survey data is the property of Network Rail. It must not be passed to any external third party without the express permission of Network Rail. Aerial Survey and other data provided by the Geo-RINM Viewer are to be used as additional sources of information to those which you currently use. It does not replace – and should not be used in place of – existing data sets outside of Geo-RINM Viewer, business processes or other procedures used to manage your assets or operations. Moreover, the use of any data provided through the Geo-RINM Viewer should always be carefully considered in the context of your specific requirements and business objectives. Aerial Survey data, and all data made available by the Geo-RINM viewer, is provided on an as-is basis. As age, consistency and accuracy of data varies, users should always evaluate the impact of these factors in the context of their particular circumstances, and seek advice from Asset Information where further guidance is required.

40 Meters

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The Five Mile Line diagrams are copyright of Waterman Civils and must not be passed to any third party.

Please note that this map is not suitable for legally binding documents. If you require a map for a legally binding document, please contact the land information team: landinformation@networkrail.co.uk

	
St Albans Abbey Station land at and adjacent station	
Scale	1 : 1,250
Plot Date	25/02/21 16:07
Printed By	Rob Turner

Output created from GeoRINM Viewer

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:

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- Mixed Use
- Employment
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- Biodiversity Improvement / Offsetting
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- Land for Tree Planting
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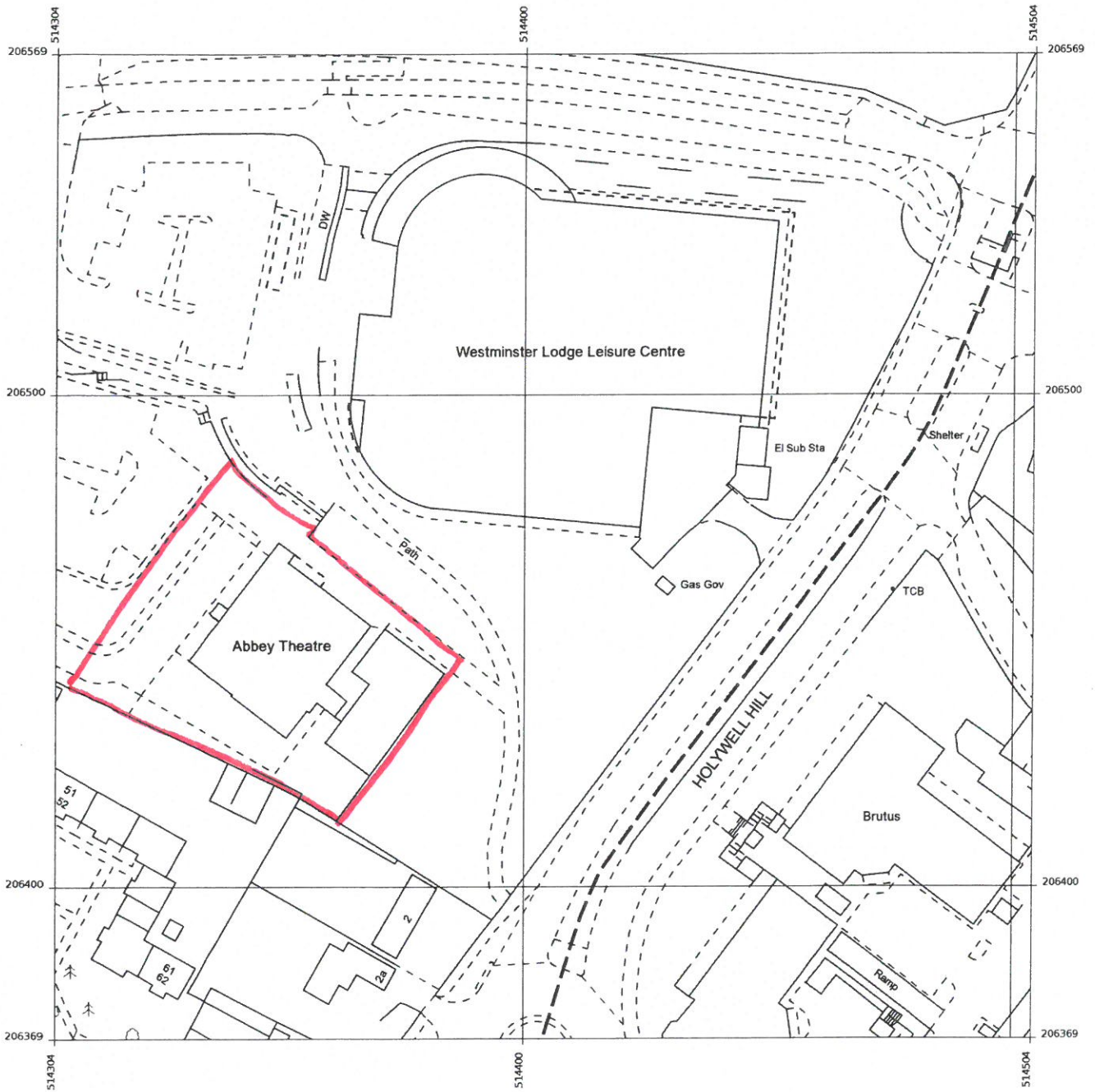
Your Details	
Name	Simon Andrews
Company/Organisation	DLA Town Planning Ltd
Address	5 The Gavel Centre, Porters Wood
Postcode	AL3 6PQ
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details					
Requirements:					
<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 					
Site address/location (Please provide a map showing the site boundary)	Abbey Theatre, Westminster Lodge, Holywell Hill, St Albans AL1 2DL				
Site area (in hectares)	0.4 Ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td>514364</td> <td>Northing</td> <td>206443</td> </tr> </table>	Easting	514364	Northing	206443
Easting	514364	Northing	206443		
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)	██████████				
Current land use	Theatre				
Condition of current use (e.g. vacant, derelict)	Theatre				
Suggested land use	<input type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input checked="" 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	A proposal has been specifically designed to not only upgrade the function of the building, but to address the more recent 1970s and 1980s extensions. The proposed scheme would provide a unified architectural concept whilst presenting a far better façade to the important Holywell Hill Frontage.				

	By retaining and emphasising the existing fly tower (a dominant feature in the composition of this building), whilst adding sensitive extensions to, in-part, replace those existing, the proposal would at the very least preserve i.e. leave unharmed, the cultural character and appearance of this building. This in many respects would enhance the overall design and layout of building.
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input checked="" type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years

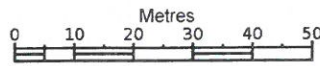
Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/>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

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input checked="" type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other	
Other comments	<p>The Abbey Theatre, as it stands, already represents a considerable investment. It cannot be moved elsewhere without the likelihood of incurring very significant costs and which, as a charity, is not feasible. Any proposal would be phased so as to enable the existing theatre to continue to operate, to the benefit of the wider local community as it has for the last 57 years. The Abbey Theatre forms a small enclave surrounded by the now redeveloped Westminster Lodge Complex. Consequently, it is severed from the open Green Belt to the north by Westminster Lodge, whilst to the south-east and south-west is the defined urban area. It would therefore be logical to make a small-scale adjustment to the proposed Green Belt boundary to include the Abbey Theatre and Westminster Lodge sites. The combined area no longer holds any significant strategic value in terms of contributing to the five purpose of Green Belt Policy</p>	



Produced 16 May 2018 from the Ordnance Survey MasterMap (Topography) Database and incorporating surveyed revision available at this date.

The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.



1:1250



Abbey Theatre, Westminster Lodge
Holywell Hill
St Albans

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database rights 2018 OS100035409
Order Licence Reference: OI1229663
Centre coordinates: 514404 206469

By email to planning.policy@stalbans.gov.uk

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

8 March 2021

My Ref: 18/445

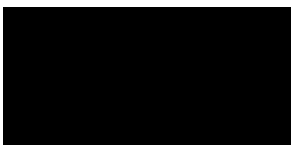
Dear sir/madam,

**RE: ST ALBANS LOCAL PLAN 2020-38 – CALL FOR SITES
ABBEY THEATRE, WESTMINSTER LODGE, HOLYWELL HILL, ST ALBANS AL1 2DL**

I write in response to your Call for Sites in association with the new Local Plan covering the period 2020-38. I am instructed by the promoter of the Abbey Theatre and have completed the relevant pro forma, which sets out the need for the theatre site to be released from the Green Belt.

I have attached the completed pro forma and site location plan. I would welcome the opportunity to discuss this site with you in due course. In the meantime, please do not hesitate to contact me if you have any queries.

Yours faithfully



Simon Andrews
Strategic Planning Manager

History of the Abbey Theatre

The St Albans Character Area Statement appreciates the long and extensive historical backdrop behind the formation of the now Abbey Theatre. The Company of Ten formed a drama group in 1934, which by 1955 had established its first theatre in a small barn at Abbey Mill. In 1961, the Council purchased land adjacent to Mud Lane and by 1968 the Abbey Theatre was constructed having been solely funded by the Company of Ten. Sir Michael Redgrave laid the foundation stone and the Queen Mother attended the first performance. Since then, the theatre has been extended to accommodate a new construction workshop, wardrobe, studio and foyer, although the Character Area Statement highlighted that the more recent 1970s and 1980s extensions detract from the balance of the building.

Extension Proposal

As such, a proposal has been specifically designed to not only upgrade the function of the building, but to address the more recent 1970s and 1980s extensions noted above. The proposed scheme would provide a unified architectural concept whilst presenting a far better façade to the important Hollywell Hill Frontage. By retaining and emphasising the existing fly tower (a dominant feature in the composition of this building), whilst adding sensitive extensions to, in-part, replace those existing, the proposal would at the very least preserve i.e. leave unharmed, the cultural character and appearance of this building. This in many respects would enhance the overall design and layout of building.

Green Belt Impact

As you can see from figure 1, an extract from the draft Local Plan Proposals Map, the Abbey Theatre forms a small enclave surrounded by the now redeveloped Westminster Lodge Complex. Consequently, it is severed from the open Green Belt to the north by Westminster Lodge, whilst to the south-east and south-west is the defined urban area. It would therefore be logical to make a small-scale adjustment to the proposed Green Belt boundary to include the Abbey Theatre and Westminster Lodge sites, as shown in figure 2. The combined area no longer holds any significant strategic value in terms of contributing to the five purpose of Green Belt Policy laid out in NPPF paragraph 134.

Furthermore, NPPF paragraph 138 and 139(c) states that when Councils are drawing up, reviewing or defining Green Belt boundaries, they should *“not include land which is unnecessary to keep permanently open”*. Considering the majority of the site (including Westminster Lodge) is now heavily developed, it is not clear why the site should be left open and the purpose it serves in doing that. In our view, the site plays a very limited, if not, no role in preserving the openness of the Green Belt and, therefore, should be regarded as *“unnecessary”* addition to the Green Belt.

Community Facilities

NPPF paragraph 20(c) states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and makes sufficient provision for community facilities (such as health, education and cultural infrastructure).

The Abbey Theatre, as it stands, already represents a considerable investment. It cannot be moved elsewhere without the likelihood of incurring very significant costs and which, as a charity, is not feasible. Any proposal would be phased so as to enable the existing theatre to continue to operate, to the benefit of the wider local community as it has for the last 57 years.

Exceptional Circumstances

It is acknowledged that Green Belt boundaries can only be altered where exceptional circumstances are fully evidence and justified in line with NPPF paragraph 135 and 136. It is clear that draft Local Plan fails to make adequate provision for cultural facilities/infrastructure and the inclusion of the site within the Green Belt makes little sense considering the heavily developed nature of the site. Given the above, and how any future proposal would contribute towards sustainable development from a social perspective, it is believed that this warrants exceptional circumstances.



Figure 1: Draft Proposals Map including the sites location



Figure 2: Proposed adjustment to the Green Belt boundary

DLA Town Planning Ltd
5 The Gavel Centre, Porters Wood
St Albans, Hertfordshire, AL3 6PQ

01727 850907
dlaoffice@dlatownplanning.com
www.dlatownplanning.com



25 January to 5pm 8 March 2021
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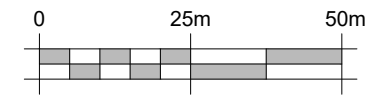
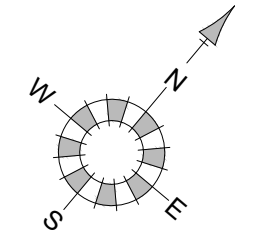
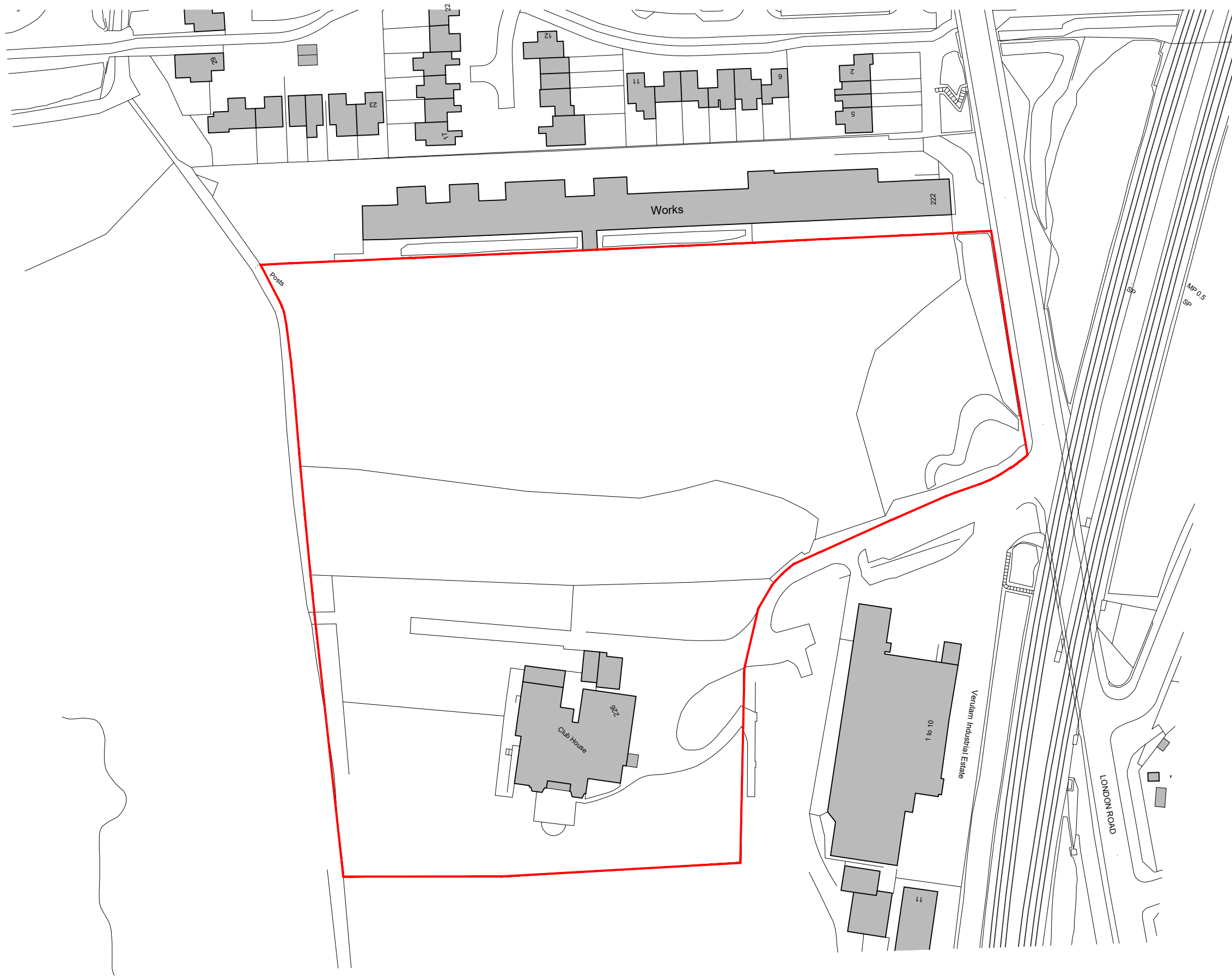
Your Details	
Name	Simon Andrews
Company/Organisation	DLA Town Planning Ltd
Address	5 The Gavel Centre, Porters Wood
Postcode	AL3 6PQ
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details					
Requirements:	<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 				
Site address/location (Please provide a map showing the site boundary)	Land at Verulam Golf Club, London Road, St Albans				
Site area (in hectares)	3.2 ha				
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; height: 1.2em; width: 100%;"></div>				
Current land use	Golf Clubhouse, car park, golf course and adjoining open land				
Condition of current use (e.g. vacant, derelict)	Part used, part vacant				
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 checked="" type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	Proposed mixed allocation of golf clubhouse and residential development – see accompanying report				

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

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input 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	See accompanying planning report	



Boundary Details	
	Application Site Boundary Line
Site Area 3.197 Hectares	

REV.	DATE	REVISIONS:	BY	STATUS:

Planning

CLIENT:	Beechwood Homes Contracting Ltd	PROJECT:	Verulam Golf Club, London Road, St. Albans, Hertfordshire, AL1 1JG
SCALE:	1:1250 (A3 ORIGINAL)	DRAWING:	Site Location Plan
DRAWN:	NL	21040	S101
DATE:	08.03.21		



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