



Woolf Bond Planning

Chartered Town Planning Consultants

Our ref: TR/GR/7776

[REDACTED]

5 March 2021

Planning
St Albans City & District Council
Civic Centre
St Peters Street
At Albans
Hertfordshire
AL1 3JE

Dear Sir / Madam

'CALL FOR SITES 2021' – PROMOTION OF LAND OFF SMUG OAK LANE, BRICKET WOOD, ST ALBANS

Introduction

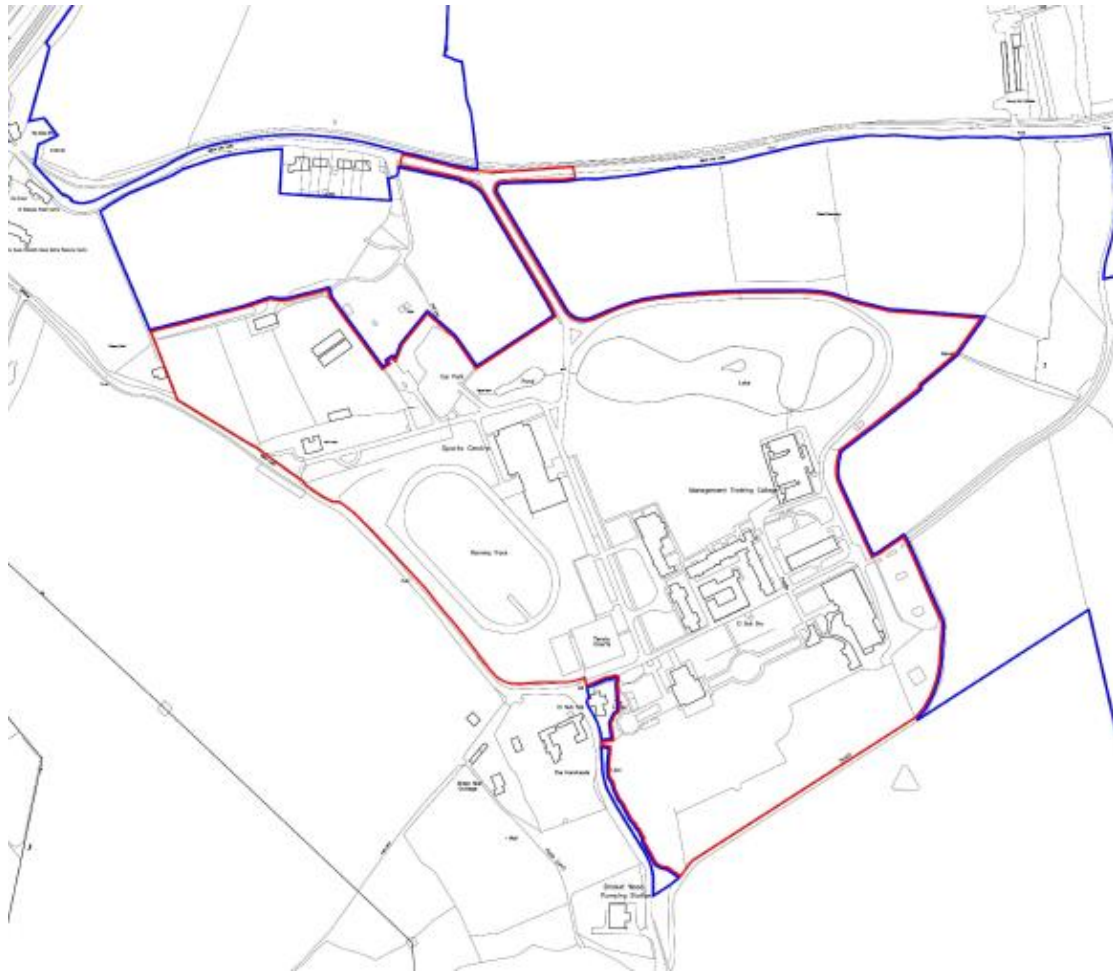
We refer to the above site and write on behalf of our client, Linden Wates (Bricket Wood) Limited alongside our submission of part of the acknowledged previously developed site in the Green Belt at the former HSBC Training Centre, Smug Oak Lane, Bricket Wood, St Albans. The site offers the potential to provide circa 46 dwellings, in addition to the 129 dwellings implemented by our client under reserved matters approval LPA Ref. 5/18/2118 (outline approved by the Secretary of State at appeal under LPA Ref. 5/2014/3250).

This call for sites submission is supported by a Location and Proposed Site Layout Plan showing the relevant part of the site where the additional 46 dwellings could be located.

The Site

The subject site forms part of the former HSBC Training Centre off Smug Oak Lane, which the Secretary of State confirmed as forming previously developed land at paragraph 8 of their 2016 decision. The Secretary of State's confirmation within the decision that the site formed previously developed land means that this status

therefore applies to the whole application site boundary as indicated by the red line on drawing Location Plan (Rev B) attached to the outline permission (extract below).



Outline Permission Location Plan Extract

The part of the wider confirmed previously developed site that is being promoted through the Call for Sites is illustrated below and comprises approximately 2.3 hectares.



Location Plan

The site lies within the Green Belt. However, this should not result in a discounting of the site's suitability for accommodating housing as envisaged through this call for sites submission.

Through the examination of the since withdrawn Local Plan¹, the Inspectors (Examination document reference ED40, dated 14th April 2020) raised a number of concerns with the approach taken by the authority. This included reference to the size of sites considered for removal from the Green Belt (and whether smaller sites had been given due consideration) alongside whether sufficient regard had been had to whether the parcels forming previously developed land or in a sustainable location well served by public transport had been given appropriate consideration. Relevant paragraphs from the Inspectors April 2020 letter are set out below:

37 As part of the fundamental approach stemming from 2013/14, smaller sites (less than 500 dwellings or 14ha) have been excluded from the Green Belt Review and site selection process. This includes the smaller scale areas of land identified in GB004 as contributing least to Green Belt purposes. Paragraph 8.1.5 of GB004 is clear that the small-scale sub areas identified in that study may not be exhaustive. It also recognises that it is possible that additional potential small-scale boundary changes that would also not compromise the overall function of the Green Belt might be identified through a more detailed survey. Thus, the capacity from such smaller sites could be much higher than that estimated by the Council.

...

¹ Local Plan withdrawn in November 2020

40. In light of the large number of homes that would need to be accommodated, the Council decided that only strategic scale Green Belt sites would be taken forward in the Plan. The advantages of strategic scale sites over smaller ones was an explicit evaluative choice made by the Council. It was based on a judgement that the strategic scale sites offer infrastructure and community benefits in way that small sites do not and in light of points raised in the public consultation responses to the Plan.

41. In looking at Green Belt releases we have concerns about the narrow focus that has been placed on only strategic sites. This has ruled out a number of sites that have already been found to impact least on the purposes of the Green Belt. It may well also have ruled out other nonstrategic sites with limited significant impacts on the Green Belt which may have arisen from a finer grained Green Belt Review.

42. Whilst the Council indicates in the May 2018 PPC report that small sites in the Green Belt are not needed (and so have not been assessed) this position appears at odds with the context of the identified shortfall situation. Moreover, the decision to discount all smaller sites in the Green Belt was made in 2013/14 and not in light of the higher levels of need for housing that are now being faced by the district. In terms of the contribution they make to Green Belt purposes, it has not been demonstrated whether a range of smaller sites would be preferable to the shortfall sites selected.

43. Additionally, we see no reason why the identification of some smaller sites would unacceptably spread the adverse impacts of development on Green Belt purposes. Whilst this would extend the impact of development over a wider geographic area, the extent of the resultant impacts would be likely to be smaller given the more limited scale of the sites (in comparison to the cumulative impact on the Green Belt purposes of developing large adjoining strategic sites, such as to the east of Hemel Hempstead as proposed).

44. We accept that large scale urban extensions would provide significant amounts of new infrastructure which both the new and already established communities would benefit from. On the other hand, a range of sites including smaller sites could also provide benefits. For example, they could be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately.

45. Overall, although previously recognised as a source of housing to be identified at some stage, smaller sites have been disregarded as part of the plan making process. It is our view that this approach has ruled out an important potential source of housing that may have been found to have a lesser impact on the purposes of the Green Belt than the sites selected without sufficient justification.

Previously developed land (PDL)

46. Paragraph 138 of the Framework states that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport.

...

48. Furthermore, as a result of the site selection process outlined above, any PDL site or site in a sustainable location well served by public transport in the Green Belt below the size threshold has been discounted for consideration. This is so regardless of its impact on Green Belt purposes. This approach fails to give first consideration to PDL land and/or that which is well served by public transport in the Green Belt, and the required process of prioritisation is not evident. (Our emphasis)

Under the 2019 NPPF and application of the standard method relying upon a 2021 base year, the authorities minimum housing requirement would now be a minimum of 892dpa². This compares to an annual need for 480 dwellings within the City and District of St Albans Local Plan Review 1994 from 1986 to 2001 as detailed in Policy 3. The requirements arising from the 2019 NPPF therefore result in a significant increase in the District's housing requirements which will require addressing through the forthcoming Local Plan.

Reflecting the conclusions of the Inspector in ED40 with respect of the since withdrawn Local Plan, it is essential that the City and District of St Albans consider all the potential opportunities for residential development, including smaller sites like the former HSBC Training Centre, notwithstanding that part of it has a detailed planning permission which is currently being implemented.

As identified through the withdrawn Local Plan examination process there is a need to acknowledge previously developed sites and ones well served by public transport. A failure of the previous plan was the discounting of sites such as the former HSBC Training Centre without detailed assessment. Consistent with NPPF paragraph 136, the Council can and should undertake a review of the Green Belt as an exceptional circumstance. This needs to form a comprehensive review appraising smaller potential alterations such as the ability for an intensified development at the former HSBC Training Centre, rather than restricted to large scale strategic sites.

Further, it is noted that the inadequacy of supply of land outside of the Green Belt was acknowledged at paragraph 32 of the Inspectors letter (ED40), although as the response indicates, they were concerned that the authority had not effectively considered a range of opportunities within the Green Belt and had thereby discounted smaller sites which potentially would have less or similar impacts upon the Green Belt.

² Applying a 40% cap to the average household growth 2021-31 of 637.1

Additionally, where other Local Authorities around London (outside of the Greater London Authority area) have submitted Local Plans for examination since the original NPPF was published in March 2012, those found sound have regularly included a commitment to review Green Belt boundaries (or made such an amendment to this designation). Such revisions to the Green Belt were justified under paragraph 83 of the NPPF (2012) and as detailed below continue to be supported by paragraph 136 of the NPPF (2019). It is therefore essential that full consideration of the scope to revise Green Belt boundaries is addressed through the preparation of an assessment of all suggested sites in the District in support of the next iteration of the Local Plan. Other authorities within Hertfordshire when preparing their Local Plans to address the housing requirements resulting from the NPPF (2019) have accepted that there are insufficient previously developed sites within their defined settlements to accommodate the minimum requirements associated with an assessment of Local Housing Need (NPPF, paragraph 73). They have consequently accepted that revisions to the Green Belt can therefore be justified as an exceptional circumstance. This also applies to the City and District of St Albans.

Any review of the Green Belt should consider areas of low quality and ineffectively used land such as our client's land at the former HSBC Training Centre. Its characteristics for identification are especially strong given it comprises previously developed land and is located within 800 metres of Bricket Wood railway station (circa 500 metres at its closest point as the crow flies). It therefore forms a prime candidate for consideration as a location to be removed from the Green Belt pursuant to paragraph 138 of the NPPF. As already referenced above, the significant need for additional homes in the District provides the necessary exceptional circumstances for removing land for the Green Belt.

As explained below, we consider that the need for housing in the District provides exceptional circumstances for changes to the Green Belt boundary.

Justification of the Exceptional Circumstances required by the NPPF (paragraphs 133–139) to revise the Council's Green Belt boundaries

In advocating revisions to St Albans' Green Belt, we note that the Council is under a duty (imposed by Section 39(2) of the Planning & Compulsory Purchase Act 2004) to exercise its function associated with the preparation of local development document with objective of contributing to the achievement of sustainable development. This is a positive obligation (Jay J *Calverton* (Appendix 1 paragraph 10)).

Planning policy makes provision for changes to be made to the Green Belt. Changes to the Green Belt are permitted through a review of a local plan (NPPF, paragraph 136). To make a change to the Green Belt boundary in the local plan there have to be "exceptional circumstances". Development needs that take up land such as housing and employment can be an exceptional circumstance to justify a review of a Green Belt boundary. This principle has been acknowledged in Hunston, in the Court of Appeal where Sir David Keene observed at [21]:

"In principle, a shortage of housing land when compared to the needs of an area is capable of amounting to very special circumstances."

At paragraph 10 of his judgment, Sir David Keene also said in respect of earlier NPPF (2012) paragraphs 87 and 88 that:

"The framework does not seek to define further what "other considerations" might outweigh the damage to the Green Belt, but in principle there seems no reason why in certain circumstances a shortfall in housing land supply might not do so."

In the *Calverton* case Jay J also reinforced these points finding at paragraph 44:

"The issue is whether, in the existence of planning judgement and in the overall context of the positive statutory duty to achieve sustainable development, exceptional circumstances existed to justify the release of Green Belt."

In the *Hundal* case paragraph 50 confirmed that the failure to meet needs since a Green Belt boundary had been defined could also amount to exceptional circumstances:

"The overriding policy of PPG2 is that the Green Belt boundaries should remain fixed once they have been validly determined. It is only if a relevant circumstance occurs that requires a change in the future for planning purposes that the circumstance will be an exceptional circumstance. An obvious example would be if, in the present case, the First Defendant had determined that it could not meet the projected housing requirements for its area up to 2031 without using Green Belt land. In that case, for the purposes of the Core Strategy, the exceptional circumstance may have been made out (assuming no other practical alternatives). At that point, a subsidiary question may arise as to which land that was currently within the Green Belt should now be freed for development. In making that latter decision, I accept that the fact that land had recently and erroneously been included within the Green Belt when the local plan was developed might be a relevant consideration in

deciding where the boundary had changed but it would be highly unlikely to be the only or the dominant factor”.

The Council’s Local Plan 1994 (paragraph 3.8) indicates that no alterations to the Green Belt were required to accommodate the Growth envisaged in that plan for the period 1986 to 2001 (policy 3). Consequently, no changes have been made to the District’s Green Belt for around 30 years, and potentially longer.

However, the spatial planning policy which did not necessitate Green Belt revision no longer exists today and consistent with the NPPF the Council needs to meet the development needs (housing and employment) of its administrative area. This represents a significant change in circumstances.

It is therefore imperative that St Albans identifies and assesses every possible opportunity within the District to meet its housing needs, therefore ensuring it can fulfil the requirements of paragraphs 20, 22 and 60 of the revised NPPF in planning for at least 892 dwellings annually from April 2021 over the period which provides for at least 15 years after the Plan’s adoption.

In light of the above analysis, housing/employment development needs can, as a matter of planning judgment, as well as the desire to promote, plan and achieve sustainable patterns of development, amount to exceptional circumstances through the development plan review process. Such an approach would be consistent with Section 39(2) and national policy (NPPF paragraphs 136 and 137).

Exceptional circumstances remain undefined and a matter of planning judgement. As confirmed by the Secretary of State for DCLG, (Nick Boles’ letter dated 3/3/14) local authorities can, if they so wish, review and tailor the extent of Green Belt in their area to reflect local circumstances. It is a matter of their planning judgement as to whether exceptional circumstances apply.

- 23 The *Calverton* case (Appendix 1) helpfully sets out the matters to examine in establishing exceptional circumstances in the context of national policy and the positive obligation in section 39(2) to plan for sustainable development. The judgement at paragraph 51 states:

“In a case such as the present, it seems to me that, having undertaken the first-stage of the Hunston approach (sc. assessing objectively assessed need), the planning judgments involved in the ascertainment of exceptional circumstances in

the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent”.

Each of these 5 matters are interrelated and apply to the City and District of St Albans.

- (i) *the acuteness/intensity of the objectively assessed needs (matters of degree may be important);***
- (ii) *the inherent constraints on supply/availability of land prima facie suitable for sustainable development;***

Matters (i) and (ii) are confirmed by the Council’s acknowledgement in the since withdrawn Local Plan that there were insufficient areas within the parts of the District inset from the Green Belt to accommodate the areas’ housing needs. With the housing need assessed under the Standard Method similar to that which the since withdrawn plan had sought to address still unresolved, it is clear that there remains clear justification for removing land from the Green Belt, such as that at the former HSBC Training Centre.

The NPPF (paragraph 137) indicates that discussions with all neighbouring authorities must be undertaken to assess whether they could accommodate any development. However, this can only occur once the City & District of St Albans has demonstrated that it has reviewed and thoroughly appraised all opportunities within its own area. Without a Housing Land Availability Assessment demonstrating that sufficient capacity exists to accommodate the District’s identified housing need (at least 892 dwellings annually as assessed through the Standard Methodology) it is essential that full consideration of the potential of the District’s Green Belt to accommodate further development is made. This is especially important since the PPG is clear that consideration should be given within a HELAA to addressing known constraints, such as Green Belt policy.

- (iii) *(On the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt.***

The Council's since withdrawn Local Plan recognised the challenges in meeting housing and employment needs without considering locations in the Green Belt. As noted above, the Inspectors examining the withdrawn Plan (ED40) also acknowledged the need for Green Belt releases (paragraph 32).

Green Belt can be removed from land around the City and District of St Albans, especially where it is sustainable as illustrated by the land promoted at the former HSBC Training Centre and consequently this would accord with paragraph 138 of the revised NPPF.

As noted above, the site lies under 800 metres from Bricket Wood station which is within an accepted 10 minute walk of this important public transport emphasising that it is sustainably located. Furthermore, Bricket Wood as a settlement lies at the second tier of the District's settlement hierarchy which is a further illustration of the suitability of this location for further growth.

As the promoted site is both in a sustainable location due to its proximity to both the village of Bricket Wood alongside its railway station together with comprising accepted previously developed land it forms a site that comprises a priority for consideration in any Green Belt review for release pursuant to paragraph 138 of the NPPF.

(iv) The nature and extent of the harm to this Green Belt (all those parts of it which would be lost if the boundaries were reviewed); and

The Secretary of State's acceptance that the whole site was previously developed and was suitable for redevelopment without harm to wider Green Belt objectives is an important characteristic of the site. Furthermore, it should be recognised that the currently approved detailed scheme for the redevelopment of the former HSBC Training Centre are significantly less than the footprint and volumes of the development which were anticipated by the Secretary of State at the appeal, which were both less than the figures associated with the Former Training Centre use. This is illustrated in the table below.

	Footprint (m²)	Volume (m³)
Original HSBC Training Centre	11,752	80,595
Outline Illustrative Masterplan	11,020	80,095
Approved RM Layout Plan ³	9,723	68,053

³ Subject to detailed architectural checks.

Consequently, further development of the site could be acceptable taking account of the impact upon the Green Belt which occurred with its former Training Centre use. The removal of the whole previously developed site could consequently be acceptable and have limited harm to the Green Belt once a wider redevelopment (including the additional land promoted through this call for sites submission is forthcoming).

Taking account of the consented redevelopment alongside the further development of the wider previously developed site, this would consequently have substantially less impact upon the wider Green Belt, in particular when compared to the release of a wholly greenfield site.

(v) *The extent to which the consequent impact on the purposes of the Green Belt maybe ameliorated or reduced to the lowest reasonably practicable extent.*

The Inspector who examined the withdrawn Local Plan identified a number of criticisms with the Council's Green Belt review and its failure to assess smaller sites, including previously developed locations such as the former HSBC Training Centre. It is therefore essential that a revised Green Belt Review is prepared. As detailed below, this further review can consider that the former HSBC Training Centre site can readily be removed from the Green Belt with limited harm to its wider purposes. This is due to its limited role in contributing towards the Green Belt, taking account its acknowledged previously developed status. This reinforces the exceptional circumstances supporting a change to the Green Belt in this location.

The forthcoming revised Green Belt review to address the previous examining Inspectors concerns can ensure that the consequent impact upon the purposes of the Green Belt are ameliorated or reduced to the lowest reasonably practicable extent by only identifying land that does not materially impact upon the purposes of the Green Belt. This is illustrated in respect of:

- a) guidance on defining Green Belt boundaries; and
- b) Green Belt purposes.

In relation to the site at the former HSBC Training Centre, the NPPF provides guidance (6 bullet points) at paragraph 139 on defining Green Belt boundaries.

1. Seek consistency with the Local Plan Strategy for meeting identified requirements for sustainable development.

The proposed boundary corresponds with the desire of seeking to meet identified housing needs close to Bricket Wood (an acknowledged sustainable location due to its inclusion in the second tier of the District's settlement hierarchy) and in a sustainable location that provide strong linkages to the settlement and the needs that arise here in order to secure sustainable patterns of development.

The site at the former HSBC Training Centre alongside the wider site under development fulfils this by reason of its proximity and linkages to Bricket Wood.

2. Not include land which it is unnecessary to keep permanently open.

The Secretary of State's confirmation that redevelopment of the previously developed land at the former Training Centre indicates that it would not be harmful to the Green Belt and consequently there is no need for the site to be kept permanently open in a Green Belt context.

- 3. Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;**
- 4. Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;**
- 5. Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;**

The site at the very least should be removed from the Green Belt as safeguarded land in order to meet longer term development needs stretching well beyond the plan period, and to ensure that the Green Belt boundaries will not be needed to be altered at the end of the development plan period.

6. Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

By realigning the Green Belt boundary to follow the accepted extent of previously developed land at the site, especially to follow Drop Lane would enable a clear boundary following a physical feature that is readily recognisable and likely to remain permanent.

It is clear that the identified Green Belt release of the land being promoted to the west of the redevelopment underway at the former HSBC Training Centre as part of

the wider removal of the whole accepted previously developed site satisfies NPPF paragraph 139 in respect of defining Green Belt boundaries.

Housing Need

As indicated above, the Council currently the adopted 1994 Local Plan annual housing target of 480 dwellings (1986-2001) is no longer up-to-date and that the most up-to-date evidence is that within the application of the Government Standard Method pursuant to paragraph 60 of the NPPF. This (using 2021 as the current year) indicates a minimum annual housing need of 892 dwellings, nearly double that of the current Local Plan. As noted above, this significant need alongside the accepted inability to accommodate this on land inset from the Green Belt contributes towards exceptional circumstances justifying amendments to Green Belt boundaries.

Green Belt Purposes

The PPG and paragraph 134 of the NPPF suggests that the type of areas that might be seen to make a relatively limited contribution to the overall Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes, would be where:

- It would effectively be 'infill,' with the land partially enclosed by development.
- The development would be well contained by the landscape, e.g. with rising land.
- There would be little harm to the qualities that contributed to the distinct identity of separate settlements in reality.
- A strong boundary could be created with a clear distinction between 'town' and 'country.'

Having regard to such purposes, it is considered that the former HSBC Training Centre, including the land to the west promoted through this call for sites submission does not provide a significant contribution to the Green Belt and could readily be removed and allocated for development.

Conclusions

Exceptional circumstances do exist. Whilst a matter of planning judgment, the Council is entitled to make such a judgement consistent with their statutory duty (section 39(2)) and the revised NPPF. The points raised above confirm that exceptional circumstances do exist, are soundly based and support revisions to the Green Belt at as advocated above with respect of land to the west of the Former Training Centre.

Requested change to Green Belt arising from call for site submission

It is proposed that the Green Belt boundaries are revised to exclude the whole of the former HSBC Training Centre from the Green Belt, including the land promoted through this call for site submission. This would consequently enable the delivery of circa 46 additional dwellings as illustrated on the indicative site layout plan below.



Indicative Site Layout for Site Promotion

As illustrated upon the site layout plan above, the scheme would form a logical infill between the implemented Linden Wates development to the east and Drop Lane that forms a landscaped physical barrier to the west. The scheme could form a mixture of housing types and forms of a scale and density consistent with that implemented on the wider site. Further, it could provide areas of public open space and an affordable housing provision contributing towards pressing needs for such types of accommodation in this high value area.

We trust this information is helpful to the authority's re-consideration of residential development site opportunities in the District. We would be happy to discuss this exceptional site opportunity in the form of a meeting in due course.

Yours sincerely

Woolf Bond Planning

Woolf Bond Planning LLP

Encs.

St Albans Call for Sites March 2021

Harper Lane Industrial site and Racing Stables, Harper Lane, Radlett

On behalf of the [REDACTED] we submit the site known as the Harper Lane Industrial Estate and Racing Stables which is shown edged red on the attached plan. The site is owned by the [REDACTED]. The area edged in green comprises the industrial uses and the area edged in purple the buildings associated with the Racing Stables.

In the current Local Plan the site is within the Green Belt. It is not identified as an allocated Employment Site, so there are no employment site planning policy restrictions to other forms of use, indeed a number of unallocated employment sites within the district have been developed under the current policy.

Due to changes in circumstances the previous Site Assessment is no longer valid (SHLAA-GB-PS-114). The site is larger than shown, the Waste Transfer Station planning permission has been superseded by a change of use (P/A 5/17/0419), substantial changes have been made to the highway, footpath and a new cycleway. The earlier Site Assessment also had inaccuracies, the site is not greenfield, the Racing Stables are not of possible community benefit, the access is not poor, external noise can be mitigated by design but in any event the trains are in a deep cutting so noise is limited, there are no wider countryside views of the site, development will not contribute to coalescence since the site is already developed.

There has been a material change of circumstances, comprising the provision of a signalised junction at Harper Lane/Watling Street, a footpath/ cycleway along Harper Lane together with a safe refuge for pedestrians over the railway bridge which provides access from the site to Watling Street. Watling Street has a footpath into Radlett and is on a Bus Route. In addition the development of Harperbury Hospital has provided further bus links.

In previous assessments of the site the 2016 SHLAA and the St Stephen Neighbourhood Plan Site Assessment (AECOM report 5/12/2017 site S36), mention is made of the poor accessibility to public transport linkages. This is no longer the case as the site has good accessibility

Bus stops within easy walking distance (160 metres)

Radlett centre and main line Train Station 1.5 km, with footpath access and bus link.

St Albans centre 5 km.

We would also point out that planning permission has been granted on other PDL sites in the Green Belt and along Harper Lane for residential development, the former Civil Defence site and Harperbury Hospital. In addition planning has been granted for other PDL sites nearby which are in the Green Belt and more remote from public transport, HSBC Training Centre Smug Oak lane and the Building Research station Bricket Wood. This is evidence the location is not considered as unsustainable.

The site as a whole extends to approx 6 hectares and includes in excess of 5,900 sq m. of buildings. The site is bordered on the west by the main line railway, to the north by Harper Lane. It is a field away from the urban settlement boundary of Radlett. We attach aerial photographs of the site and its context with Radlett.

Our clients have examined two types of residential development for the site, as a retirement village to meet the specific needs for the increasing numbers of elderly and as general housing scheme. Indicative Master Plans are attached for each. As for a Retirement scheme the Council will be aware from the Burston Nursery site Appeal and from keen interest from Audley Retirement in relation to this site, the market evidence is there is a great need for this type of accommodation. Neither developers would invest

£ millions into these projects unless there was the end demand which justified the level of investment. The need for general housing is very well documented.

Whether the site should now be excluded from the Green Belt in an issue. Clearly, in isolation it does not serve the purposes of including the land within the Green Belt. The St Stephen N.P> Site Assessment makes reference to a Green Belt Boundary change. Moreover, Ventura Industrial Estate to the north has been removed from the Green Belt so there is precedent. The site is certainly PDL and the NPPF (para 137 a) places an emphasis on such sites coming forward before Green Belt Releases are considered. The NPPF does not make a distinction between PDL in the urban area, countryside or Green Belt. As already noted the site is in a sustainable location.

In summary the site performs well in terms of sustainability, it is already developed and the existing built footprint is greater than for a residential scheme on the site (assuming say 100 dwellings with an average footprint of 55 sq m. = 5,500 sq.m). On 6 hectares the site has an overall estimated capacity of 150 dwellings.

[REDACTED]

Bidwells, John Ormond House, 899 Silbury Boulevard, Milton Keynes, MK9 3XJ

[REDACTED]

Harper Lane Industrial Estate

Legend

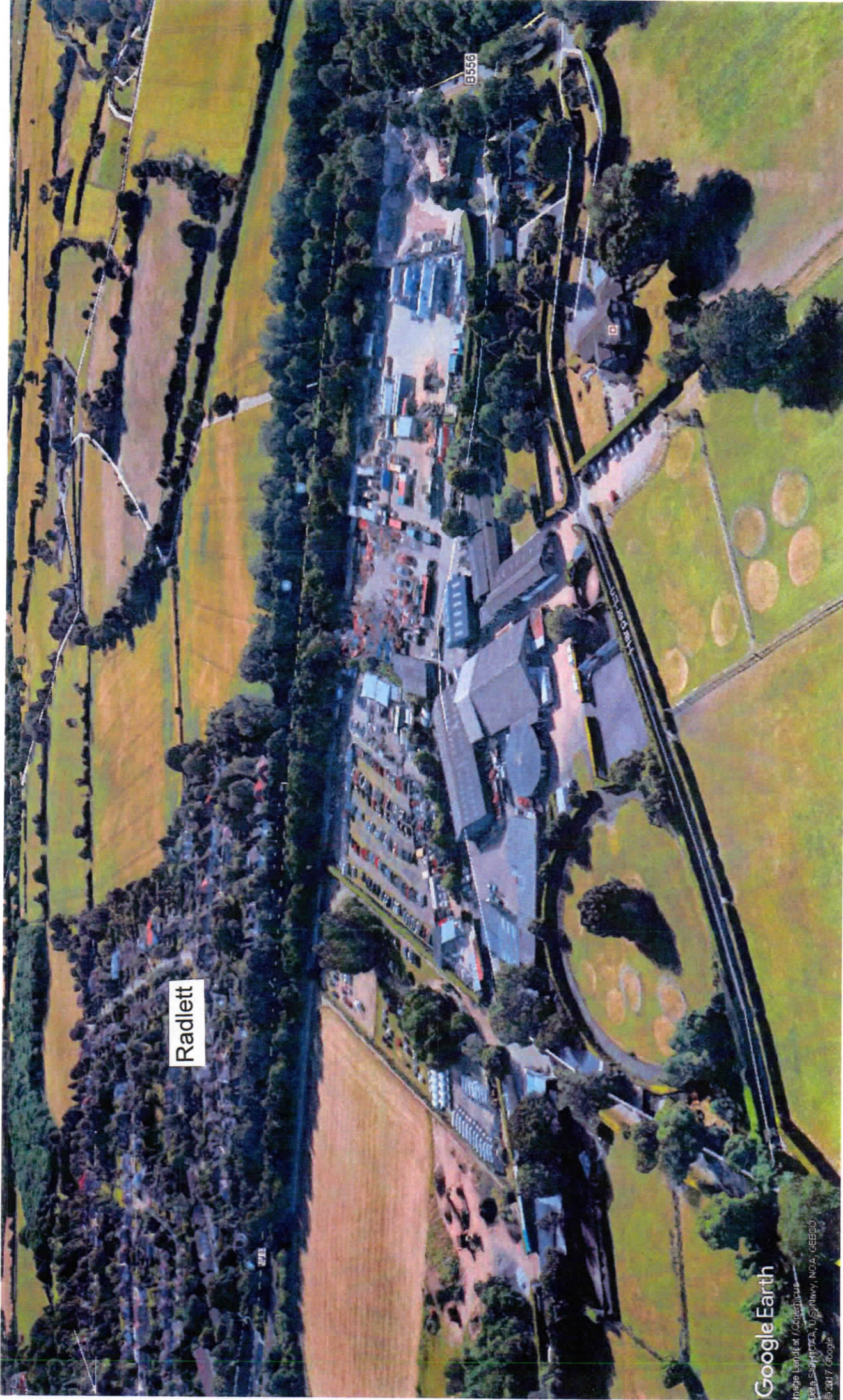




Radlett

Google Earth

Image Landsat / Copernicus
Data SRTM 1000m, US Navy, NSA, GEBCO
© 2017 Google

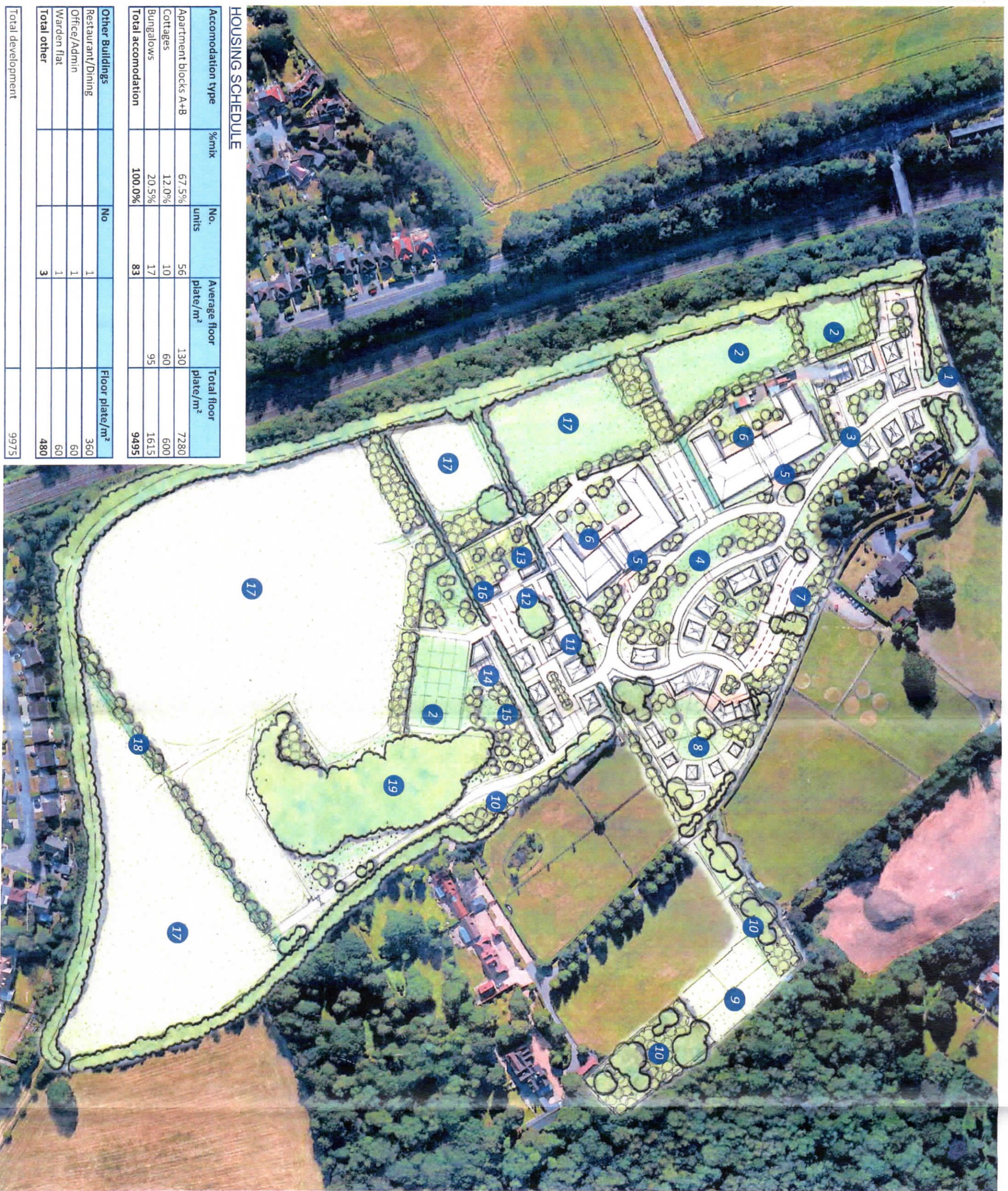


Radlett

B556

Google Earth

Image Landsat / Copernicus
Data: Sentinel-2, TOSS/Navv, NSA, GEBCO
© 2017 Google



KEY

1. Entry Landscape
2. Open Space / Pitches
3. Bungalows Facing Central Garden
4. Village "Green"
5. 2 - 2.5 Storey Flats - Parking Under in the Slope
6. West Facing Garden Terraces
7. Parking / West Woodland Edge
8. Green and community Facilities
9. Land Restored to Pasture
10. Woodland Block to Give More Privacy to Existing Homes
11. Mews Cottages / Bungalows
12. Parking to Apartments
13. Allotments
14. Gym & Changing Facilities for Tennis Courts
15. Bowls Green & Garden
16. Kitchen Garden
17. Pasture Land for Horses
18. New Native Hedgerow
19. Woodland Block - brought under management

A 03.10.17 Changes to road layout

Rev. Date Details.
 Do not scale from this drawing
 All dimensions to be checked
 on site
 This plan is to be read with all
 accompanying documentation
 © Bidwells 2017

BIDWELLS Urban Design
 Bidwell House, Trumpington
 Road, Cambridge CB2 9LD

K. T. Ivory Haulage And Storage
 LAND OFF THE B556,
 HARPER LODGE FARM,
 RETIREMENT LIVING

Job Code OS License Number
 39643 100017734
 Drawing Scale Date Drawn By Checked By
 NTRS 25.09.17 HD/EL JC
 Drawing Number
 UDSS39643-A3-0102 A

HOUSING SCHEDULE

Accommodation type	%mix	No. units	Average floor plate/m ²	Total floor plate/m ²
Apartment blocks A+B	67.5%	56	130	7280
Cottages	12.0%	10	60	600
Bungalows	20.5%	17	95	1615
Total accommodation	100.0%	83		9495

Other Buildings	No	Floor plate/m ²
Restaurant/Dining	1	360
Office/Admin	1	60
Warden flat	1	60
Total other	3	480

Total development 9975



- KEY**
1. Entry and Walling
 2. Group of four 5/6 bed homes
 3. Local Green
 4. Small Local Garden
 5. Pitches/Open Space
 6. Allotments
 7. Attenuations Features
 8. New Woodland Blocks
 9. Woodland Block - brought under management
 10. Visitor Parking

A 03.10.17 Changes to housing layout

Rev. Date. Details.
 Do not scale from this drawing
 All dimensions to be checked
 on site
 This plan is to be read with all
 accompanying documentation
 © Bidwells 2017

BIDWELLS Urban Design
 Bidwell House, Trumpington
 Road, Cambridge CB2 9LD

K. T. Ivory Haulage And Storage
 LAND OFF THE B556,
 HARPER LODGE FARM,
 RESIDENTIAL HOUSING

Job Code OS License Number
 39643 100017734
 Drawing Scale Date Drawn By Checked By
 NTRS 25.09.17 HD/EL JC
 Drawing Number Revision:
 UDSS39643-A3-0101 A

HOUSING SCHEDULE

Bed no.	Mix %	No units	Average floor plate m ²	Total floor plate m ²
2-bed	30%	28	85	2380
3-bed	40%	39	110	4290
4-bed	30%	28	120	3360
Total	100%	95	105.5	10,030

St Albans Call for Sites March 2021

Harper Lane Industrial site and Racing Stables, Harper Lane, Radlett

On behalf of the Ivory family we submit the site known as the Harper Lane Industrial Estate, Racing Stables and adjoining land which is shown edged and hatched red on the attached Plan. The site is owned by the [REDACTED]. A large part of the site comprises an established Industrial Estate and Racing Stables together with a number of residential dwellings.

In the current Local Plan the site is within the Green Belt. It is not identified as an allocated Employment Site, so there are no employment site planning policy restrictions to other forms of use, indeed a number of unallocated employment sites within the district have been developed under the current policy.

Due to changes in circumstances the previous Site Assessment on part of the site is no longer valid (SHLAA-GB-PS-114). The site is larger than shown, the Waste Transfer Station planning permission has been superseded by a change of use (P/A 5/17/0419), substantial changes have been made to the highway, footpath and a new cycleway. The earlier Site Assessment on part of the site also had inaccuracies, a large part of the site is not greenfield, the Racing Stables are not of possible community benefit, the access is not poor, external noise can be mitigated by design but in any event the trains are in a deep cutting so noise is limited, there are no wider countryside views of the site, development will not contribute to coalescence since the site is already developed.

There has been a material change of circumstances, comprising the provision of a signalised junction at Harper Lane/Watling Street, a footpath/ cycleway along Harper Lane together with a safe refuge for pedestrians over the railway bridge which provides access from the site to Watling Street. Watling Street has a footpath into Radlett and is on a Bus Route. In addition the development of Harperbury Hospital has provided further bus links.

In previous assessments of the site the 2016 SHLAA and the St Stephen Neighbourhood Plan Site Assessment (AECOM report 5/12/2017 site S36), mention is made of the poor accessibility to public transport linkages. This is no longer the case as the site has good accessibility

Bus stops within easy walking distance (160 metres)

Radlett centre and main line Train Station 1.5 km, with footpath access and bus link.

St Albans centre 5 km.

Planning permission has been granted for other sites nearby which are in the Green Belt and more remote from public transport, we refer to the HSBC Training Centre Smug Oak lane and the Building Research station Bricket Wood, Harperbury Hospital and Civil Defence site Harper Lane. This is evidence the location is not considered as unsustainable.

The site edged and hatched in red as a whole extends to approx 18 hectares and includes in excess of 6,500 sq m. of building footprint which includes warehousing, industrial units, Racing Stables 5 houses and stable lads accommodation. The site is bordered on the west by the main line railway, to the north by Harper Lane. It adjoins in one part the settlement edge of Radlett. We attach aerial photographs of site and its context with Radlett.

Harper House which is owned by or clients is a Listed Building, this heritage asset and its environs would be protected within any scheme so given the PDL surroundings the setting will be enhanced but certainly less than substantial harm would arise. The Listed buildings grounds and gardens together with the front paddocks and central avenue of trees will not change.

The site is large enough to provide compensatory improvements referred to in NPPF para 138 and a 10% net gain in bio diversity

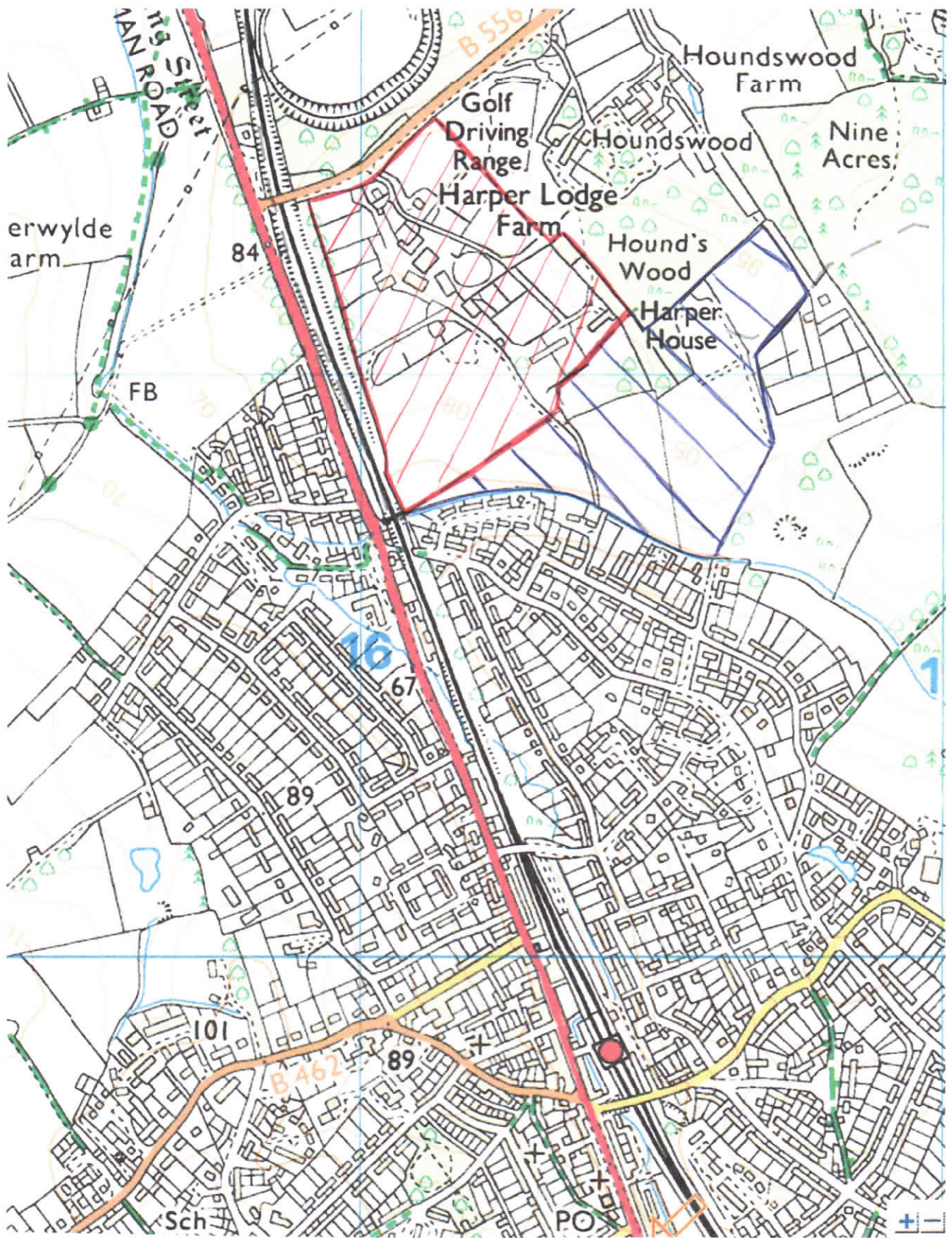
The site is of a size which should now be excluded from the Green Belt. The St Stephen N.P. Site Assessment makes reference to a Green Belt Boundary change. Moreover, Ventura Industrial Estate to the north has been removed from the Green Belt so there is a precedent. A permanent and defensible Green Belt Boundary can be provided by additional landscaping where necessary, though much of the site has long established boundary features. As already noted the site is in a sustainable location.

Given the proximity of the site to Radlett, this is a case for the Council to exercise the Duty to co-operate with Hertsmere and provide an Urban extension to Radlett. Such an urban extension could include the whole or part of the land hatched blue on the Plan, which is also owned by the [REDACTED] who also have the benefit of reserved rights of access connecting into Radlett from these fields. The area of the hatched red and blue land extends to approx 34 hectares, which is of a development size where significant on site facilities can be provided for residents within the development.

In summary the site performs well in terms of sustainability is already partly developed and would provide a sustainable urban extension.

[REDACTED]
Bidwells, John Ormond House, 899 Silbury Boulevard, Milton Keynes, MK9 3XJ

[REDACTED]



Harper Lane Industrial Estate



Google Earth

Legend

300 m

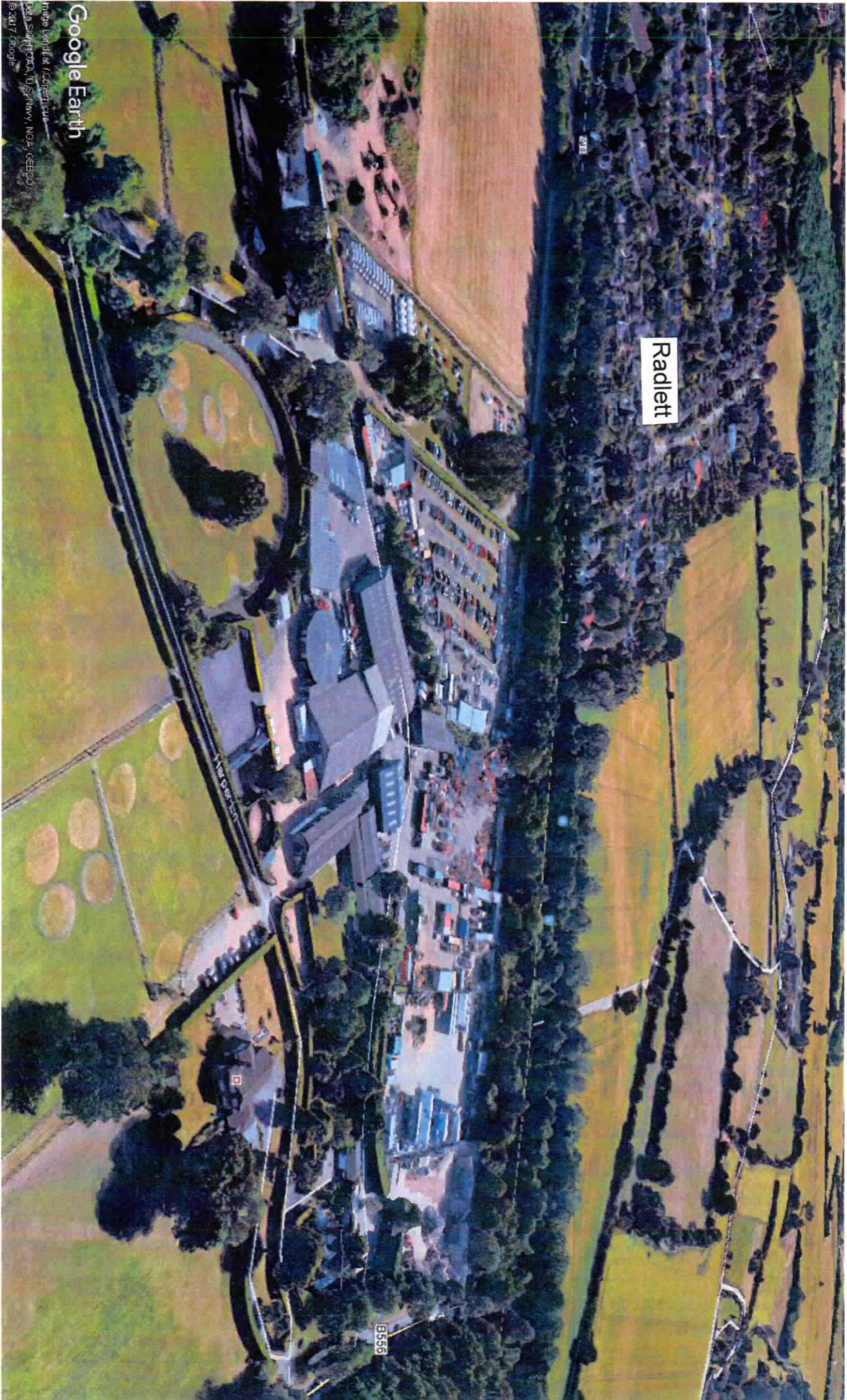




Radlett

Google Earth

Images Landsat / Copernicus
Data SIO, NOAA, US Navy, NGA, GEBCO
©2017 Google



Radlett

Google Earth

Image Landsat / Copernicus
Data: SRTM30 PLUS, US Navy, NGA, GEBCO
© 2017 Google

B556

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

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

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

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

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

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

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

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

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

Please do not submit sites that:

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

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

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

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

By online consultation portal:

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

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

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

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

Your Details	
Name	██████████
Company/Organisation	Arrow Planning
Address	Clarks Barn, Bassetsbury Lane, High Wycombe, HP11 1QX
Postcode	HP11 1QX
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 adjacent to Winslo House, 200 Radlett Road, Colney Street, St Albans, AL2 2EN				
Site area (in hectares)	0.38ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td>515405</td> <td>Northing</td> <td>202327</td> </tr> </table>	Easting	515405	Northing	202327
Easting	515405	Northing	202327		
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: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 700px; height: 15px;"></div>				
Current land use	Currently vacant save for dog grooming business in unit 1 and a small amount of storage.				
Condition of current use (e.g. vacant, derelict)	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 type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	The Site is available, suitable (comprises previously developed land, is sustainably located with good access to public transport and jobs) and available to be delivered in the next 1-5 years.				

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 checked="" type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No Site is currently designated as Green Belt land.
Planning Status	<input type="checkbox"/> Planning Permission Granted <input checked="" type="checkbox"/> Planning Permission Refused <input checked="" type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input checked="" type="checkbox"/> Other – Pending Appeal Decision <ul style="list-style-type: none"> • Please include details of the above choice below (for example planning reference numbers and site history). • 5/2020/0728 and 5/2020/0730 – certificates of existing lawfulness demonstrating previously developed land. • 5/20/1667 – application refused on Green Belt grounds for 9 dwellings – currently the subject of an appeal. • Two applications are currently being validated for 7 and 8 unit schemes on the Site. 	

Other comments	<p>In respect of application ref: 5/20/1667 the Council took the view that 9 large family dwellings could not be accommodated. The applicant has appealed this decision. Applications for 7 and 8 units are currently being validated by the Council. The Site is clearly capable of achieving some form of residential development. This was acknowledged in 2018 under pre-application ref: PRE/2018/0042. The only question is the quantum of development that can be achieved. Therefore, for the purposes of the HELAA it is considered to be reasonable to include the site as being capable of accommodating 7 to 9 units subject to detailed planning.</p> <p>Application ref: 5/20/1667 has confirmed that the site is acceptable in principle with regard to:</p> <ol style="list-style-type: none">1) Wider design considerations,2) Landscape impact;3) Impact on amenity;4) Access and parking; and,5) All other planning matters, <p>Therefore, save for a dispute in respect of the impact on openness (which may be addressed by reducing the scale of built form – or by removing the site from the Green Belt as part of the Local Plan, in line with previous Local Plan Inspectors comments in relation to allocating smaller sites), the site is considered to be suitable for residential development of up to 9 units.</p>
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location plan
 1/1250



Clarks Barn, Bassetsbury Lane, High Wycombe, Bucks HP11 1QX
 T 01494 888000 F 01494 888008 E RICClark@richardclarkarchitects.co.uk

CONTRACT
 WINSLO HOUSE
 200 RADLETT ROAD
 COLNEY ST
 ST ALBANS
 AL2 2EN
 CLIENT
 BLENHEIM REALTY

DRAWING
 LOCATION PLAN
 9 UNITS

DRAWN DATE
 IE MAR 20
 SCALE JOB / DRWG No
 1:1250 AT A3 1723 / SP10



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St Albans Draft Local Plan 2020 - 2038

Land at 47 & 55 Bucknalls Drive, Bricket Wood

St Albans Call for Sites Response 2021

Planning Report on behalf of Rice Developments

DLA Ref: 91/009

March 2021

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1.0 INTRODUCTION

1.1.0 This report is submitted in response to the Call for Sites on behalf of the owners of land at 47 & 55 Bucknalls Drive, Bricket Wood. The site is being promoted for residential development.

1.1.1 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.

1.1.2 The report site is well located in relation to key services and facilities and is within walking distance of a school, shops, health and leisure facilities. It lies less than 500m from a bus stop and 1.3km from the railway station.

1.1.3 Given the nature of the site and its surroundings, it is not considered that the site makes a significant contribution to the openness of the Green Belt, nor does it aid the prevention of urban sprawl, such that it is unnecessary to keep it permanently open.

1.1.4 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground. There are no constraints that would prevent development.

1.1.5 Significantly, the site was supported through the Neighbourhood Plan process for St Stephen Parish. Although all development sites are set to be removed from the draft Neighbourhood Plan as a result of the withdrawal of the St Albans draft Local Plan, the fact that the site was consistently supported by the Parish Council is significant for the Local Plan site assessment process.

1.1.6 The site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.

2.0 SITE & CONTEXT ANALYSIS

2.1.0 Location

The Report Site is located on the eastern side of Bucknalls Drive (Nos 49 to 75) and to the west of Bricket Wood Common. Bucknalls Drive comprises the southernmost extension of the large village of Bricket Wood, some 600m south-west of the village centre.

2.2.0 Context & Land Uses

It is proposed that Element Nos 1 and 2, an area of some 1.1 ha, are released from the Green Belt.

- **Element No1: Nos 47 & 55 Bucknalls Drive**

Accessed from the main section of Bucknalls Drive via a drive adjacent to Nos 53 and 59, these comprise a pair of large, detached chalet bungalows set in the narrowest northern section of the site.

- **Element No 2: Grassland**

This central section of the site comprises an area of essentially level grassland which increases in width to the south.

- **Element No.3**

This area could be retained as woodland and form an extension to Bricket Wood Common to the east.

2.3.0 Access

The site includes the existing vehicular access from Bucknalls Drive adjacent to the frontage dwellings Nos 53 and 59, and which serves the 5 existing backland dwellings to the north of the site (Nos 47 49a, 51a, 53a and 55).

2.4.0 Development Plan Notation

The Proposals Map of the St Albans District Local Plan Review 1994, shows the Application Site within the Metropolitan Green Belt and Landscape Development Area, abutting the defined boundary of the village of Bricket Wood and which is identified as a Specified Settlement 1. Local Plan Policy 2; Settlement Strategy, defines Specified Settlements as large villages excluded from the Green Belt. Bricket Wood Common, immediately to the east, is a designated Site of Special Scientific Interest (SSSI). In addition, part of the site is located within a County Wildlife Site. The strip of woodland separating the site from the BRE employment site to the south is subject to TPO 1355 (The relevant District Plan policy in respect of Landscape Development Areas was not 'saved' and so now carries no weight).

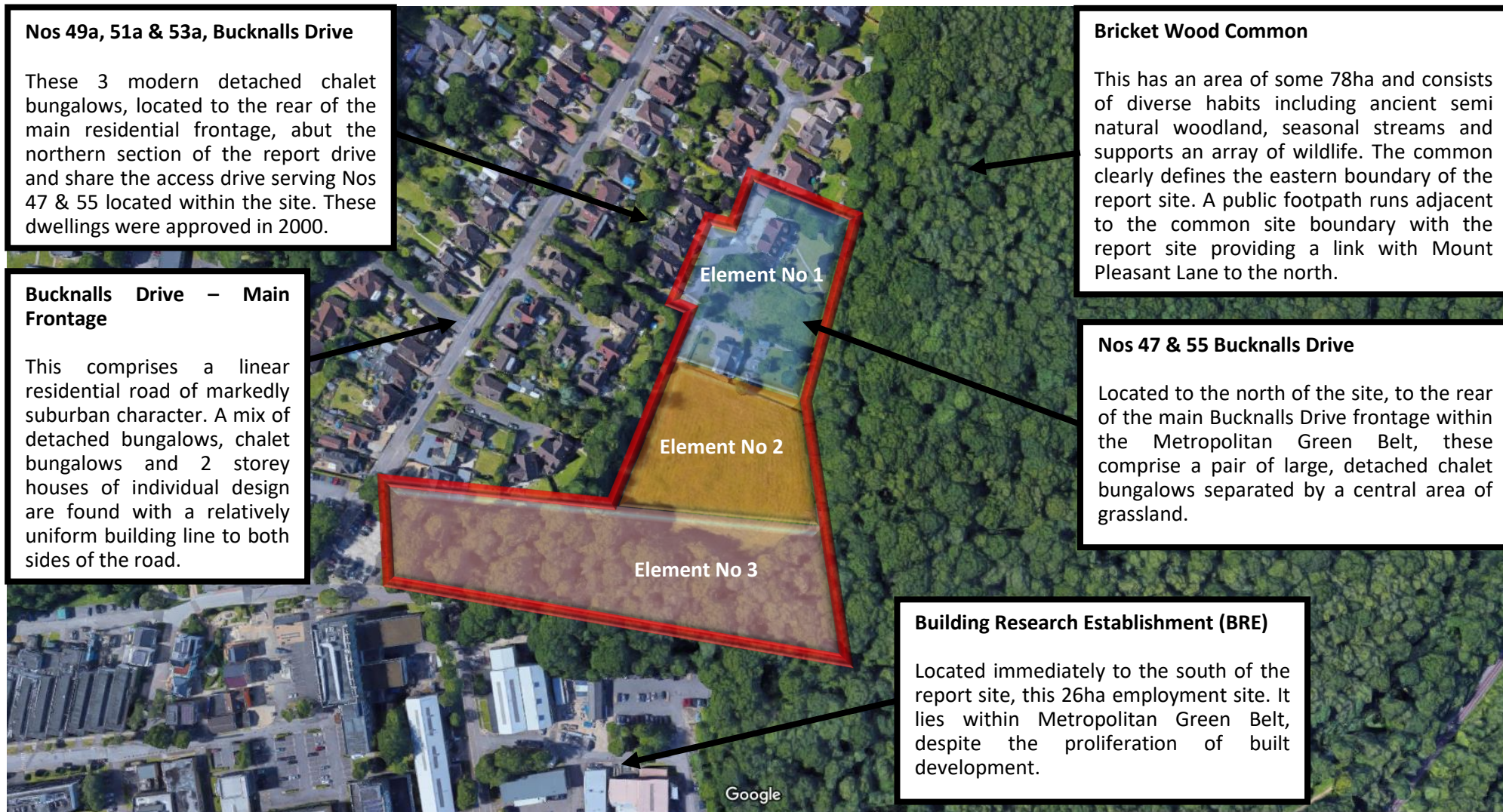


Figure 1: Site context and Land Uses

2.5.0 Local services

The application site is located in close proximity to a good range of shops and services within 2km of the site, as set out below.

Facility	Local Provision	Proximity to site (km)
Education	Mount Pleasant Lane Primary School	1km
	St Michael's High School, Watford	2.2km
Retail	Oakwood Road - includes Convenience Store; Post Office; Off Licence; Pharmacy; Butchers	750m
Medical	Bricket Wood Medical Centre	850m
	Dentist	750m
Employment	Building Research Establishment Ltd	200m
Leisure	Bricket Wood Common	0m
	Black Green	1km
	Bricket Wood Social Club	1km

2.6.0 Accessibility

The site is well served by public transport services as set out below.

2.6.1 Local Bus Services

The site is around 0.5km from the bus stops on Mount Pleasant Lane to the north. Buses 621/622 and W1 are provide regular services to St Albans, Bricket Wood and Watford.

2.6.2 Rail Services

Bricket Wood Station is located some 1.3km to the north-west of the site. The Station is on the Abbey Line running between Watford Junction and St Albans Abbey Stations. Watford Junction is also on the West Coast Main Line, which provides connections to London (Euston), Birmingham, Manchester, Liverpool, Glasgow and Edinburgh.

3.0 STRATEGIC CONTEXT

3.1.0 This Call for Sites opportunity marks the start of a new Local Plan process. With the withdrawal of the draft Local Plan in 2020 following the withdrawal of the Strategic Local Plan in 2017, the need for an up-to-date strategic framework for development is more urgent than ever.

3.1.1 The objectively assessed housing need for St Albans district is around 900 dwellings per year. This should be the starting point. However, the Council will also be aware of neighbouring authorities that are struggling to meet their own housing requirements. The Council will need to have open and constructive dialogue with these authorities if it is to satisfy the Duty to Cooperate. The potential for St Albans district to assist with meeting housing needs from surrounding areas should not be dismissed at this stage. There is considerable development potential within the district, partly stemming from the fact that Green Belt boundaries have not been properly reviewed for around 35 years. The Council should not see the 900 homes per year target as a ceiling if greater potential emerges through the Green Belt review or other evidence.

3.2.0 Housing need

The reliance on a Local Plan adopted in 1994 and the housing policies and land allocations therein has had a catastrophic effect on housing delivery within the district. With an annual housing target of around 900 homes per year and annual housing completions since 2001 running at 376 homes per year, a whole generation of young people have been largely unable to access the housing market. Recent performance can be judged by the latest Housing Delivery Test results for St Albans District (published in February 2021), which indicated a HDT measurement of only 63% for the period 2017/18 to 2019/20 – the 33rd worst of the 298 local authorities in England.

3.2.1 While housing completions have, to a degree, been propped up by recent changes to permitted development rights, these have not had an impact on the delivery of affordable housing. The target of 200 affordable homes per year from the 1994 Local Plan has not been met. Since 1994, 1,826 affordable homes have been delivered, against a target of 5,200 – only 34% of the target and a shortfall of 3,374 affordable homes. In 2019/20, only 31 affordable homes were completed – just 7% of total completions.

3.2.2 The delivery of a new Local Plan with updated housing targets, new housing allocations and new Green Belt releases is of the utmost importance for the district.

3.3.0 **The portfolio of housing sites**

To meet housing need will require the delivery of a mixed portfolio of housing sites. A range of sizes, types and locations will be needed to enable a wide range of housebuilding organisations to contribute to meeting needs, including arrangements for self-build properties.

3.3.1 The previous focus only on strategic sites of 500 dwellings or more must change. As highlighted by the Inspectors examining the now-withdrawn draft Local Plan, and as recognised by the Council's Planning Portfolio holder, small and medium-sized sites within the Green Belt must be seriously considered.

3.4.1 **Green Belt considerations**

The Council's Green Belt review from 2012 provides a useful starting point but is in no way adequate to support a new Local Plan. The focus on strategic sites must change and the Green Belt review must look at the site-specific impacts of proposed development sites. The broad-brush, coarse-grain approach to assessing parcels of Green Belt land in the 2012 Review must be developed into a more sophisticated and nuanced review of development potential. This will include both strategic and smaller-scale housing and employment sites.

4.0 PLANNING HISTORY

4.1.0 Site

The table below shows the relevant planning history for this site.

LPA Reference	Proposal	Decision
5/14/1694	Alterations and extension to existing access road, proposed development of twelve detached houses with garaging and parking and proposed open space	Appeal Dismissed – 11/08/2015

5.0 PREVIOUS SHLAA ASSESSMENT

5.1.0 The Council's assessment of this site set out in the SHLAA concludes that this site is suitable for development, subject to the ecological impact. In respect of the ecology issues, an Ecological Constraints Report was commissioned in December 2013. This work concluded that the site offered little habitat suitable for protected species such as dormice, badgers and Great Crested Newts. Areas around the edge of the site may offer suitable habitat for bats and Great Crested Newts but these areas could be retained as part of any development.

6.0 NEIGHBOURHOOD PLAN PROPOSALS

6.1 The report site was submitted for consideration through the St Stephen Neighbourhood Plan in 2017. The nature of the submission was very similar to previous SHLAA submissions in terms of the number and type of units.

6.2 The St Stephen Neighbourhood Plan group commissioned consultants, AECOM, to assess the sites put forward around the parish and to recommend which, if any, should feature in future a Neighbourhood Plan. AECOM's report dated 5 December 2017 summarises the findings.

6.3 In respect of the report site, known as site S1, AECOM concluded

“This site has been assessed as suitable and available for development in the 2016 SHLAA. It would therefore be an appropriate site for the NP to put forward as a proposal for housing, under Policy DLP 12 of the Draft Strategic Local Plan 2011-2031. If this site is selected for proposed allocation by the Neighbourhood Plan, and accepted by St Albans DC, the neighbourhood plan proposal would be implemented through a Green Belt boundary change in a future review of the Local Plan.”

6.4 A Pre-Submission (Regulation 14) version of the draft Neighbourhood Plan was published for consultation in October 2020. This document included Policy 28 which allocated the report site for residential development. The wording of the draft policy is set out in Figure 2 below.

POLICY S28: LAND TO REAR OF 45 TO 75 BUCKNALLS DRIVE

- 1. 1.51 ha of land off Bucknalls Drive is allocated for residential development subject to the following criteria:**
 - i. the provision of a minimum of 14 bungalows, with a mix of dwelling sizes in accordance with Policy S2;**
 - ii. the adequate provision of Sustainable Drainage Systems (SUDs);**
 - iii. the provision of appropriate vehicle access into the site from Bucknalls Drive;**
 - iv. the retention of the pond and existing dwelling;**
 - v. the provision of land and financial contributions towards a new amenity green space on land adjacent to the site that would enable access to Footpath 59 which runs adjacent to the site.**
- 2. Development should demonstrate that it represents high quality and sustainable design and creates places and spaces for people. In particular proposals should adhere to the criteria as set out in Policy S4.**

Figure 2: St Stephen Neighbourhood Plan extract, October 2020 draft

6.5 The Pre-submission Neighbourhood Plan was developed in parallel with the Local Plan and the publication of the Regulation 14 Neighbourhood Plan coincided with the withdrawal of the Local Plan. On this basis, the Neighbourhood Plan group felt they could no longer include potential Green Belt releases as the strategic framework that would have been provided by the Local

Plan no longer existed and the Neighbourhood Plan was at risk of not being consistent with Government policy if it proposed Green Belt allocations.

6.6 The version of the Neighbourhood Plan that has been submitted to St Albans City and District Council therefore contains no proposed housing sites.

6.7 However, the “technicality” that prevents the Neighbourhood Plan from allocating Green Belt sites should not detract from the fact that the Neighbourhood Plan group supported development of the report site. Furthermore, the consultation feedback on the pre-submission Neighbourhood Plan was also positive. 48% of the residents’ feedback for this site was positive and a further 26% was neither positive nor negative. Only 26% of respondents disagreed or strongly disagreed with the provisions of draft Policy 28. This level of public support for a greenfield development site is extremely rare.

6.8 Were it not for the withdrawal of the draft Local Plan, this site would be proposed for allocation in the Neighbourhood Plan.



Figure 3: St Stephen Neighbourhood Plan extract, October 2020 draft

7.0 SITE CONSTRAINTS

7.1.0 The Council's Call for Sites 2021 pro forma seeks information on any constraints affecting potential sites. While the constraints applying to this site are discussed throughout this report, the information is summarised here in the same format as requested on the pro forma, for ease of reference.

7.2.0 Contamination/Pollution

No suspected issues of contamination or pollution that would preclude development.

7.3.0 Environmental issues

Bricket Wood Common, immediately to the east, is a designated Site of Special Scientific Interest (SSSI). In addition, part of the site is located within a County Wildlife Site. The strip of woodland separating the site from the BRE employment site to the south is subject to TPO 1355.

7.4.0 Flood risk

The site is located within Flood Zone 1 and therefore is at very low risk of flooding.

7.5.0 Topography

The main trapezoid section of the site comprises an area of essentially level grassland. There are mature tree lines to the southern, eastern and western boundaries. The common boundary with No 55 to the north is marked by a 1.8m close boarded fence.

7.6.0 Utility services

It is likely that utilities are available in Bucknalls Drive to which a connection could easily be made.

7.7.0 Legal issues

The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present.

7.8.0 Access

The site includes the existing vehicular access from Bucknalls Drive adjacent to the frontage dwellings Nos 53 and 59, and which serves the 5 existing backland dwellings to the north of the site (Nos 47 49a, 51a, 53a and 55).

8.0 OUTLINE OF PROPOSAL

8.1.0 The site is considered to be particularly suitable for housing for older people and an indicative layout has been produced showing a development of 14 bungalows. The provision of retirement bungalows responds to a specific need that can rarely be satisfied by non-Green Belt sites because of viability constraints. Access is available from Bucknalls Drive.

8.1.1 Although the site is currently located within the Green Belt it would make a sensible and rational extension to Bricket Wood. The site could be released from the Green Belt without impacting on wider Green Belt purposes and a new defensible Green Belt boundary could be drawn around the site using readily identifiable features on the ground.

8.1.2 There are no designations that would prevent development of the site. The site is in single ownership and could be brought forward for development quickly. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.

8.1.3 The landowners also own land of around 0.88ha to the south of the site, which is wooded and is subject to a Tree Preservation Order. It is proposed that this area remains within the Green Belt

and it could act as an extension of Bricket Wood Common. The landowners have had initial discussions with the Parish Council regarding the potential gifting of this land, together with a commuted sum for its future maintenance, subject to the remaining land being allocated for housing.

8.1.4 In summary, this site should be allocated in the emerging Local Plan as a housing site with an estimate of around 15 homes.



Figure 2: Proposed Site Layout

9.0 GREEN BELT IMPACT

9.1.0 Paragraph 134 of the NPPF states that the Green Belt serves five purposes. These five purposes have been set out below with an assessment on the site's contributions to each purpose.

9.2.0 **Purpose 1 – to check the unrestricted sprawl of large built-up areas**

The site is located away from large built-up areas of London, Luton and Dunstable and Stevenage and therefore makes limited or no contribution to this purpose.

9.3.0 **Purpose 2 – to prevent neighbouring towns merging into one another**

There would be no decrease in the gap between St Albans to the north or Watford to the south, particularly given that permission was given on appeal to residentially develop part of the BRE site to the south. It would therefore have a limited impact on this purpose.

9.4.0 **Purpose 3 – to assist in safeguarding the countryside from encroachment**

The site is distinct from the woodland to the east, such that there would be no encroachment into the countryside. Development proposals present a small-scale infill development on the urban fringe of Bricket Wood on a site that is afforded a high level of containment, enclosed by woodland and residential built form, the effect upon the landscape character is of negligible significance and is highly localised. As a result, the site displays much lower levels of openness due to the presence of urbanising development and is considered to make limited to no contribution to this purpose.

9.5.0 **Purpose 4 - to preserve the setting and special character of historic towns**

The land does not form part of the historic setting of St Albans or contribute to its special character. This should be limited or no contribution.

9.6.0 **Purpose 5 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

It is a common assumption that all Green Belt land within the District makes a significant contribution to this purpose.

9.7.0 **Summary of harm to Green Belt**

Paragraph 133 of the NPPF stipulates that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*. Thus, whilst openness is an essential characteristic, in assessing its importance this cannot be divorced from the overriding aim of preventing urban sprawl. This notion is supported by paragraph 139 of the Framework, with regard to Green Belt boundaries. This states that when defining boundaries, local planning authorities should, inter alia, *“not include land which it is unnecessary to keep permanently open”*.

9.7.1 Given the nature of the site and its surroundings, it is not considered that the site makes a significant contribution to the openness of the Green Belt, nor does it aid the prevention of urban sprawl, such that it is unnecessary to keep it permanently open. Whilst the site is open, it is contained by the adjoining existing residential development to the north and west and by

the area of woodland to the east such that it makes a limited contribution to the wider openness of the Green Belt and would result in no significant encroachment into open countryside. To this end, if considered in isolation, it is not considered necessary to keep the site permanently open.



Figure 3: Existing and Proposed Green Belt Boundaries

10.0 CONCLUSIONS

- 10.1.0 This report is submitted in response to the Call for Sites on behalf of the owners of 47 & 55 Bucknalls Drive, Bricket Wood. The site is being promoted for residential development.
- 10.1.1 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 10.1.2 The report site is well located in relation to key services and facilities and is within walking distance of a school, shops, health and leisure facilities. It lies less than 500m from a bus stop and 1.3km from the railway station.
- 10.1.3 Given the nature of the site and its surroundings, it is not considered that the site makes a significant contribution to the openness of the Green Belt, nor does it aid the prevention of urban sprawl, such that it is unnecessary to keep it permanently open.
- 10.1.4 Significantly, the site was supported through the Neighbourhood Plan process for St Stephen Parish. Although all development sites are set to be removed from the draft Neighbourhood Plan as a result of the withdrawal of the St Albans draft Local Plan, the fact that the site was consistently supported by the Parish Council is significant for the Local Plan site assessment process.
- 10.1.5 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground. There are no constraints that would prevent development.
- 10.1.6 The site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.