

Spatial Planning Policy Consultation Response

Planning Application No.	5/2022/2443
Site:	Bricket Wood Sports And Country Club, Paintball Site & Bricket Lodge Lye Lane Bricket Wood Hertfordshire AL2 3TF
Description of development:	Outline application (access sought) - Demolition of existing buildings and construction of up to 115 dwellings and creation of new access
Recommendation:	<u>Refuse</u>
Officer Contact:	Andrew Wright

ADVICE/ COMMENTS

The following advice and comments relate to principle of development, very special circumstances, and housing land supply / proposed housing mix.

Principle of Development

Relevant Policy

The proposed development would be located in the Metropolitan Green Belt.

Local Plan (Saved 2007) Policy 1 'Metropolitan Green Belt' states:

"Within the Green Belt, except for development in Green Belt settlements referred to in Policy 2 or in very special circumstances, permission will not be given for development for purposes other than that required for:

- a) mineral extraction;*
- b) agriculture;*
- c) small scale facilities for participatory sport and recreation;*
- d) other uses appropriate to a rural area;*
- e) conversion of existing buildings to appropriate new uses, where this can be achieved without substantial rebuilding works or harm to the character and appearance of the countryside.*

New development within the Green Belt shall integrate with the existing landscape. Siting, design and external appearance are particularly important and additional landscaping will normally be required. Significant harm to the ecological value of the countryside must be avoided."

The NPPF (2021) states:

“147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

PPG Paragraph: 001 Reference ID: 64-001-20190722:

“What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- the degree of activity likely to be generated, such as traffic generation”*

Evidence Base and previous Local Plan work

SKM Green Belt Review

The SKM Green Belt Review comprises:

- Part 1: Green Belt Review Purposes Assessment (Prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council) –2013
- Part 2: Green Belt Review Sites & Boundaries Study – Prepared for St Albans City and District Council only – February 2014

Note: the SKM Green Belt Review Part 2 is entirely replaced by the Arup St Albans Stage 2 Green Belt Review June 2023.

Part 1: Green Belt Review Purposes Assessment (Prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council) – November 2013

The site is identified as part of GB26 (Green Belt Land to North of Bricket Wood) in the Green Belt Review. The Principal Function / Summary for this parcel is as follows:

“Significant contribution towards maintaining the existing settlement pattern (providing gaps between Chiswell Green, How Wood and Bricket Wood). Partial

contribution towards preventing merging. Overall the parcel contributes significantly towards 1 of the 5 Green Belt purposes.”

Call for Sites - 2021

The site was submitted via the Call for Sites process which ran from January to March 2021. It is identified as being the westerly part of site STS-47-21 in the Housing and Economic Land Availability Assessment (HELAA) and is considered to be potentially suitable subject to absolute and non-absolute constraints being reasonably mitigated. It should be noted that the HELAA process has not taken into account Green Belt constraints.

Arup St Albans Stage 2 Green Belt Review June 2023

The Arup Stage 2 Green Belt Review Annex Report June 2023 identifies the site within sub-area SA-128. The sub-area’s Categorisation and Recommendation reads:

“The sub-area performs weakly against NPPF purposes but makes an important contribution to the wider Green Belt. Not recommended for further consideration.”

Housing

The proposal is for up to 115 residential dwellings.

Housing Land Supply

SADC currently has a housing land supply of 2.0 years from a base date 1 April 2022. It is acknowledged that 2.0 years is substantially below the required 5 years.

Housing and Affordable Housing Need

GL Hearn South West Herts – Local Housing Need Assessment (LHNA) (September 2020). The following table on page 141 of the LHNA sets out the required need for different sized homes.

- **Recommendation: The following mix of homes size by tenure is suggested as a strategic mix across the 2020-2036 period. As there are only modest changes at a local authority level this mix can be applied across the HMA and at a local level.**

Size	Market	Affordable Homes to Buy	Affordable Homes to Rent
1-bedroom	5%	25%	30%
2-bedrooms	20%	40%	35%
3-bedrooms	45%	25%	25%
4+-bedrooms	30%	10%	10%

- The mix identified above could inform strategic policies although a flexible approach should be adopted. In applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. The Councils should also monitor the mix of housing delivered.
- It will ultimately be for the Council(s) to write into policy the approach which best meets their local circumstance. This could be, for example, a desire for further downsizing or a pragmatic approach to a constrained housing supply both of which would see a greater proportion of smaller homes being built.

The LHNA does not recommend an affordable housing percentage, as it is up to the Council to decide with consideration of viability. Below sets out the range of affordable housing need.

Table 37: Estimated Annual Level of Affordable/Social Rental Housing Need (2020-2036)

	Dacorum	Hertsmere	St. Albans	Three Rivers	Watford	SW Herts
Current need (divided across 16 year period)	70	71	63	45	101	350
Newly forming households	570	380	486	360	448	2,243
Existing households falling into need	353	133	197	77	163	924
Total Gross Need	993	585	745	483	712	3,517
Supply	630	228	303	133	230	1,523
Net Need	363	356	443	350	482	1,994

Source: Census/CoRe/Projection Modelling and affordability analysis

- 5.99 For authorities with a plan period other than 2020-2036, the current need as stated in the final column of Table 33 should be divided by the number of years in the plan period. This will impact the total gross need, but the other numbers are calculated on a per annum basis so will not change.

Table 42: Estimated Annual Need for Affordable Home Ownership (2020-2036)

	Dacorum	Hertsmere	St. Albans	Three Rivers	Watford	SW Herts
Current need	25	18	34	14	26	118
Newly forming households	410	260	512	259	303	1,743
Existing households falling into need	76	55	103	41	79	355
Total Gross Need	511	333	649	315	408	2,217
Supply	263	186	265	153	156	1,023
Net Need	248	147	385	162	252	1,194

Source: Range of data sources as described

- 5.143 As per the analysis for affordable homes to buy, for those authorities whose plan period differs from the 2020 to 2036 period, the current need should be divided by the number of years in the plan period being used. This will also impact the calculation of the gross and net need. All the other factors are shown on a per annum basis.

The application is for 35% affordable housing, with 25% of these as First Homes. This is in line with the Council's Affordable Housing SPG, which seeks provision of 35% affordable housing on sites in the Green Belt.

Housing Summary

It is clear that there is no 5 year land supply and that very substantial weight should be given to the delivery of housing. It also clear that there is a need for affordable housing and very substantial weight should be given to delivery of affordable housing.

Overall Conclusion

It is considered clear that a number of significant harms and significant benefits would result from this proposed development. A 2021 appeal decision in the District allowing permission for residential development in the Green Belt is also significant (Ref: 5/2020/1992 - Roundhouse Farm Bullens Green Lane Colney Heath). The SKM Green Belt Review 2013 considered that overall parcel GB 26 does partially contribute to preventing neighbouring towns from merging, and in addition makes a significant contribution to maintaining the existing settlement pattern.

The Arup Stage 2 Green Belt Review Annex Report 2023 identifies the site within sub-area SA-128. The sub-area's Categorisation and Recommendation reads: *"The sub-area performs weakly against NPPF purposes but makes an important contribution to the wider Green Belt. Not recommended for further consideration."*

It is clear that there is no 5 year land supply and that substantial weight should be given to the delivery of housing. It also clear that there is a need for affordable housing and substantial weight should be given to delivery of affordable housing.

This note is focussed on key policy evidence and issues but recognises that considerable other evidence is relevant. In totality it is considered that this recommendation is to Refuse.