**LAND BETWEEN CARAVAN SITE AND WATLING STREET, PARK STREET, ST ALBANS**

**APPEAL AGAINST REFUSAL OF OUTLINE PLANNING PERMISSION BY ST ALBANS CITY & DISTRICT COUNCIL**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Planning Application Reference:** 5/22/0267/LSM

**Appeal Reference:** APP/B1930/W/24/3343986

**ALL CORE DOCUMENTS**

|  |
| --- |
| **Document** |
| **CD1 – APPLICATION DOCUMENTS** |
| **Application Administration** |
| CD1.1 | Application Form, dated 01 February 2022 |
| CD1.2 | Ownership Certificates, dated 11 February 2022 |
| CD1.3 | 82-01C – Location Plan |
| **Plans and Drawings** |
| CD1.4 | Land Registry Title Plan  |
| CD1.5  | IL-01 Rev D - Illustrative Layout, prepared by Thrive Architects |
| CD1.6 | PP-01 Rev C – Parameter Plan, prepared by Thrive Architects |
| CD1.7 | BBS-BB-EGL-SU-00 – Existing Ground Level Survey Overview, prepared by BB Surveys LTD |
| CD1.8 | BBS-BBEGL-SU-01 - Existing Ground Level Survey Overview Sheet 1, prepared by BB Surveys LTD |
| CD1.9 | BBS-BBEGL-SU-02 - Existing Ground Level Survey Overview Sheet 2, prepared by BB Surveys LTD |
| CD1.10 | BBS-BB-EGL-SU-03 - Existing Ground Level Survey Overview Sheet 3, prepared by BB Surveys LTD |
| CD1.11 | BBSBB-EGL-SU-04 - Existing Ground Level Survey Overview Sheet 4, prepared by BB Surveys LTD  |
| CD1.12 | BBS-BB-EGL-SU-05 - Existing Ground Level Survey Overview Sheet 5, prepared by BB Surveys LTD |
| CD1.13 | 20880-HYD-XX-XX-DR-D-2200 P03 - Foul & Surface Water Drainage Strategy, prepared by Hydrock |
| **Supporting documents** |
| CD1.14 | Arboricultural Impact Assessment, prepared by Nicholsons Lockhart Garratt, January 2022 |
| CD1.15 | Archaeological Desk Based Assessment, prepared by Wardell Armstrong, November 2021  |
| CD1.16 | Biodiversity Impact Assessment, prepared by Lockhart Garratt, January 2022  |
| CD1.17 | Design and Access Statement, prepared by Thrive Architects, January 2022  |
| CD1.18 | Drainage Strategy, prepared by Hydrock, January 2022  |
| CD1.19 | Flood Risk Assessment, prepared by Hydrock, January 2022  |
| CD1.20 | Framework Travel Plan, prepared by Atkins, January 2022 |
| CD1.21 | Green Belt Appraisal, prepared by Lockhart Garratt, December 2021  |
| CD1.22 | Landscape and Visual Impact Assessment, May 2022  |
| CD1.23 | Phase 1 Desk Study, prepared by Hydrock, October 2021  |
| CD1.24 | Planning Statement, prepared by Maddox Planning, January 2022  |
| CD1.25 | Preliminary Ecological Appraisal Report, prepared by Lockhart Garratt, December 2021  |
| CD1.26 | Transport Assessment, prepared by Atkins, January 2022  |
| CD1.27 | Utilities Statement, prepared by Hydrock, January 2022  |
| **CD2 – ADDITIONAL/AMENDED REPORTS AND/OR PLANS SUBMITTED AFTER VALIDATION** |
| **Plans and drawings** |
| CD2.1 | IL-01 Rev F - Illustrative Layout, prepared by Thrive Architects |
| CD2.2 | PP-01 Rev E - Parameter Plan – 01, prepared by Thrive Architects |
| CD2.3 | 5153233-ATK-GEN-PRKST-DR-C-000001 Rev P1.6 – Proposed Site Access, prepared by Atkins |
| CD2.4 | 5153233-ATK-GEN-PRKST-DR-C-000003 Rev P01.1 – Swept Path Analysis, prepared by Atkins |
| CD2.5 | PP-01 Rev F – Parameter Plan – 01, prepared by Thrive Architects |
| CD2.6 | 4064/12/21-1600 v5 – Illustrative Biodiversity Net Gain Plan, prepared by Nicholsons Lockhart Garratt  |
| CD2.7 | Illustrative Landscape Design Strategy 4064/12/22-0160 v6, prepared by Nicholsons Lockhart Garratt |
| **Supporting documents** |
| CD2.8 | Thames Water E-mail Correspondence, March 2022  |
| CD2.9 | Framework Travel Plan, prepared by Atkins, May 2022  |
| CD2.10 | Agricultural Land Classification Report, prepared by Ceres Rural LLP, May 2022  |
| CD2.11 | Letter from Nicholsons Lockhart Garratt, May 2022  |
| CD2.12 | Planning Statement Addendum, prepared by Maddox Planning, May 2022  |
| CD2.13 | Transport Assessment Addendum, prepared by Atkins, May 2022  |
| CD2.14 | Additional Information Covering Letter dated 1 June 2022  |
| CD2.15 | Nicholsons Lockhard Garratt Spatial Planning Response Letter, July 2022  |
| CD2.16 | Badger Walkover Survey, prepared by Nicholsons Lockhart Garratt, September 2022  |
| CD2.17 | Biodiversity Metric, October 2022  |
| CD2.18 | Drainage Strategy, prepared by Hydrock, October 2022  |
| CD2.19 | Drainage Technical Design Note, prepared by Hydrock, August 2022  |
| CD2.20 | Nicholsons Lockhard Garratt Response to Ecology Comments, October 2022  |
| CD2.21 | Draft Heads of Terms, May 2023  |
| CD2.22 | Nicholsons Lockhard Garratt Green Belt Review, August 2023  |
| CD2.23 | Traffic Impact Technical Note, prepared by Atkins, September 2023  |
| CD2.24 | Stage 1 Road Safety Audit, prepared by AtkinsRéalis, October 2023  |
| CD2.25 | RSA Stage 1 Response, prepared by AtkinsRéalis, November 2023  |
| CD2.26 | Transport Assessment Addendum 2, prepared by Atkins, October 2022  |
| CD2.27  | Hertfordshire Ecology Consultation Response, 22 March 2023 |
| **CD3 – THE APPLICATION DECISION** |
| CD3.1 | Refusal Decision Notice dated 19 January 2024 |
| CD3.2 | 14 August 2023 Committee Report |
| CD3.3 | 15 January 2024 Committee Report |
| CD3.4 | August 2023 Committee Report Minutes |
| CD3.5 | January 2024 Committee Report Minutes |
| CD3.6 | Webcast of the Planning Meeting on 14 August 2023 |
| CD3.7 | Webcast of the Planning Meeting on 15 January 2024 |
| **CD4 – PRE-APPLICATION DOCUMENTATION** |
| CD4.1 | LPA Pre-application response (ref. PRE/2021/0120) September 2021 |
| CD4.2 | Landscape pre-application response (ref. PRE/2021/0181) December 2021 |
| CD4.3 | Landscape Pre-App Response July 2022 |
| **CD5– THE DEVELOPMENT PLAN** |
| CD5.1  | St Albans District Local Plan Review 1994 |
| CD5.2 | St Stephen Parish Neighbourhood Plan 2022 |
| CD5.3 | National Planning Policy Framework (NPPF) December 2023 |
| **CD6 – EMERGING DEVELOPMENT PLAN** |
| CD6.1 | Draft Local Plan 2041 (Regulation 18 Public Consultation) |
| CD6.2 | Site Allocations for Regulation 18 Draft Local Plan |
| CD6.3 | Regulation 18 Draft Local Plan Policies Map |
| CD6.4 | St Albans Stage 2 Green Belt Review Final Report prepared by Arup, June 2023 |
| CD6.5 | National Planning Policy Framework: draft text for consultation 30 July 2024 |
| CD6.6 | Proposed reforms to the National Planning Policy Framework and other changes to the planning system, updated 2 August 2024 |
| CD6.7 | St Albans Stage 2 Green Belt Review Annex Report, June 2023 |
| **CD7 – PLANNING GUIDANCE DOCUMENTS** |
| CD7.1 | St Albans City and District Council Design Advice Leaflet No 1 – Design and Layout of New Housing, 1998 |
| CD7.2 | St Albans City and District Council Affordable Housing SPG, 2004 |
| CD7.3 | St Albans City and District Council Revised Parking Policies and Standards, 2002 |
| CD7.4 | Housing Delivery Test: 2022 Measurement |
| **CD8 – RELEVANT DECISIONS** |
| CD8.1 | Land North and South of Chiswell Green Lane Appeal Decisions |
| CD8.2 | Roundhouse Farm Appeal Decisions, Land Off Bullens Green Lane |
| CD8.3 | Land to rear of 112-156B Harpenden Road Decision |
| CD8.4 | Land To Rear of Burston Garden Centre, North Orbital Road Appeal Decision |
| CD8.5 | Land off Orchard Drive Decision |
| CD8.6 | Land North of Boissy Close Decision |
| CD8.7 | Copsewood Lye Lane Resolution to Grant |
| CD8.8 | Land to the Rear of 42-100 Tollgate Road and 42 Tollgate Road Appeal Decision  |
| CD8.9 | Land off Old Orchard Appeal Decision |
| CD8.10 | Land to the East of Newport Road Decision |
| CD8.11 | Land at North End, Creech St Michael Decision |
| CD8.12 | Land at Dene Road, Cotford St. Luke Decision |
| CD8.13 | Land adjacent to Cornerways, Tewkesbury Decision |
| CD8.14 | Land at Sondes Place Farm, Dorking Decision |
| CD8.15 | Land to the west of Langton Road, Norton Decisions |
| CD8.16 | Land to the rear of the former Dylon International Premises, Lower Sydenham Decision |
| CD8.17 | Land at Maitland Lodge, Billericay Decision |
| CD8.18 | Land between Lodge Lane and Burtons Lane, Little Chalfont Decision |
| CD8.19 | Land at Little Bushey Lane, Bushey Decision |
| CD8.20 | Land Rear of 248 Hart Road, Thundersley Decision |
| CD8.21 | Judgement of Lord Carnwath (with whom Lady Hale, Lord Hodge, Lord Kitchen and Lord Sales agree) in R (on the application of Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council (Appellant) [2020] UKSC 3 |
| CD8.22 | Sales LJ in Turner v Secretary of State for Communities and Local Government [2016] EWCA Civ 466 |
| CD8.25 | Land at Potash Road Billericay |
| CD8.26 | Land at the Old Cottage, Lingfield |
| CD8.27 | Land South of Headley Road, Leatherhead |
| CD8.28 | Land at 52 Harris Lane, Shenley |
| CD8.29 | Land rear of 19 The Avenue, Welwyn |
| CD8.30 | Land North of Bradmore Way, Brookmans Park |
| CD8.32 | Upper Halliford Road, Shepperton |
| CD8.33 | Land south of Shenley Road, Radlett |
| CD8.34 | Land East of Manor Trading Estate, Benfleet |
| CD8.35 | Land North of Raleigh Drive, Esher |
| CD8.36 | Land at Brittains Lane, Sevenoaks |
| CD8.37 | Land east of Bredon Road and Tewkesbury Road, Mitton |
| CD8.38 | Land east of Rayleigh Road Thundersley |
| CD8.39 | Land north of Wilderness Lane Great Barr |
| **CD9 – APPELLANT’S CASE** |
| CD9.1 | Appellant’s Statement of Case |
| CD9.2 | Appellant’s Planning Proof of Evidence |
| CD9.3 | Appellant’s Highways Proof of Evidence |
| CD9.4 | Appellant’s Landscape and Greenbelt Proof of Evidence |
| CD9.5 | Appellant’s Affordable Housing Proof of Evidence |
| CD9.6 | Appellant’s Air Quality Technical Note |
| CD9.7 | Appellant’s Agricultural Land Classification Report |
| CD9.8 | St Albans City and District Authority’s Monitoring Report 2023 |
| CD9.9 | South West Hertfordshire Strategic Housing Market Assessment (2016) |
| CD9.10 | South West Hertfordshire Local Housing Needs Assessment (2020) |
| CD9.11 | St Albans City and District Council Housing Strategy 2023 – 2026 |
| CD9.12 | St Albans City and District Council Homelessness Strategy 2022 - 2025 |
| CD9.13 | St Albans City and District Council Corporate Plan 2021 - 2026 |
| CD9.14 | St Albans City and District Council Housing Allocations Policy, December 2021 |
| CD9.15 | Technical Statement re: Five Year Housing Land Supply and Delivery, August 2024  |
| CD9.16 | Hertfordshire County Council Highways Response 24 March 2022 |
| CD9.17 | Hertfordshire County Council Highways Response 3 February 2023 |
| CD9.18 | Guidelines for Landscape and Visual Impact Assessment |
| CD9.19 | Northern Thames Basin National Character Area Profile |
| CD9.20 | St Stephen’s Plateau Landscape Character Area Profile  |
| CD9.21 | Technical Note for Protected Species August 2024 |
| CD9.22 | Rebuttal Proof of Evidence of Claudia Lesley Currie (Highways) |
| CD9.23 | Rebuttal Proof of Evidence of Claudia Lesley Currie (Sustainability) |
| CD9.24 | Rebuttal to Protected Species Proof of Evidence |
| CD9.25 | Housing Need and Affordable Housing Rebuttal Proof of Evidence of Martin Aust  |
| **CD10 – COUNCIL’S EVIDENCE** |
| CD10.1 | Council’s Statement of Case |
| CD10.2 | Council’s CIL Compliance Statement |
| **CD11 – RULE 6 PARTY’S EVIDENCE** |
| CD11.1 | Greenbelt (Rule 6 Party) Statement of Case |
| CD11.2 | Housing Land Supply Estimate (including workings) |
| CD11.3 | Greenbelt’s Planning & Green Belt Proof of Evidence |
| CD11.4 | Greenbelt’s Planning & Green Belt Appendices |
| CD11.5 | Greenbelt’s Highways & Traffic Proof of Evidence |
| CD11.6 | Greenbelt’s Highways & Traffic Appendices |
| CD11.7 | Greenbelt’s Landscape Character & Appearance Proof of Evidence |
| CD11.8 | Greenbelt’s Landscape Character & Appearance Appendices |
| CD11.9 | Greenbelt’s Sustainability Proof of Evidence |
| CD11.10 | Greenbelt’s Sustainability Appendices |
| CD11.11 | Greenbelt’s Protected Species Proof of Evidence |
| CD11.12 | Greenbelt’s Protected Species Appendices |
| CD11.13 | Greenbelt’s Housing Technical Note |
| CD11.14 | Greenbelt’s Note on Agricultural Land |
| CD11.15 | HCC Highways Proof of Evidence Appeal 3338501 |
| CD11.16 | HCC Highways Response to 23/2191 |
| CD11.17 | 601 Bus Timetable |
| CD11.18 | 635 Bus Timetable |
| CD11.19 | Traffic Impact of the SRFI |
| CD11.20 | HCC Highways Response to Welwyn Hatfield 22/1097 |
| CD11.21 | Swept Path Analysis In Appeal 3338501 |
| CD11.22 | Swept Path Analysis Out Appeal 3338501 |
| CD11.23 | Coroner’s Report - Ella |
| CD11.24 | Greenbelt Rebuttal Planning Evidence |
| CD11.25 | Greenbelt Rebuttal Highways Evidence |
| CD11.26 | Greenbelt Rebuttal Landscape Evidence |
| CD11.27 | Greenbelt Rebuttal Agricultural Evidence |
| CD11.28 | Greenbelt Rebuttal Affordable Housing Evidence |
| CD11.29 | Hertfordshire Traffic volumes 2000 to 2023:<https://roadtraffic.dft.gov.uk/local-authorities/78> |
| CD11.30 | Impacts of COVID-19 Lockdown on Traffic Flow (Oxford study) |
| CD11.31 | Road Traffic Estimates Great Britain 2021 |
| **CD12 – AGREED DOCUMENTS** |
| CD12.1 | Statement of Common Ground – Agreed and signed 25 June 2024 |
| CD12.2 | Revised Statement of Common Ground – Agreed and signed 09 August 2024 |
| **CD13 – INQUIRY DOCUMENTS (TO BE ADDED DURING COURSE THE COURSE OF THE INQUIRY)** |
| CD13.1 | Final Draft Unilateral Undertaking  |
| CD13.2 | List of agreed suggested conditions |
| CD13.3 | CMC Summary Note 16.7 |
| CD13.4 | List confirming speakers for Rule 6 Party |
| CD13.5 | CMC Summary Note 180724 |
| CD13.6 | List confirming speakers for Appellant |
| CD13.7 | Inquiry timetable |
| **CD14 – OTHER RELEVANT DOCUMENTS** |
| CD14.1 | SKM Final Report – Green Belt Reviews November 2013 |
| CD14.2 | SKM Annex Report – Green Belt Reviews November 2013 |
| CD14.3 | SADC Draft Strategic Local Plan 10.10.12 |
| CD14.4 | SADC Failed Local Plan 2016 |
| CD14.5 | SADC Failed Local Plan 2019 |
| CD14.6 | P&MPDG. Part 3 |
| CD14.7 | Hertfordshire’s Local Transport Plan (LTP4) |
| CD14.8 | P&MPDG. Part 1, Chapter 5, Transport Assessments |
| CD14.9 | AECOM Green Belt Review 2017 |
| CD14.10 | SHLAA Evaluation Outcomes Appendix 3 |
| CD14.11 | Draft Unilateral Undertaking (Appellant 19.08.24) |