

St Albans City and District Local Plan

Site Sifting Process Addendum - July 2025 (SADC/ED81)

On behalf of

The Trustees of the Shonleigh Trust

Land at Park Street Lane, How Wood.

Reg 19, Sub 100

This response to the above consultation should be considered alongside the submissions made on behalf of our clients to the Reg 18, Reg19 (Sub100) , the Hearing Statement and the points raised at the Examination Hearing, where we raised with the Inspectors that the information/evidence used in the Pro Forma regarding our clients site was inaccurate resulting in prejudice to my clients site being properly considered within the site sifting process.

Para 1.10 of the Addendum states “the process has been comprehensive, thorough and consistent”. Our clients take issue with this statement.

Firstly, the Green Belt Study in relation to Site SA-126 apparently took no account of the two previous studies, the first commissioned by St Albans (SHLAA), the second by St Stephen Parish Council (Aecom Report). The conclusions of both were not negative to the Green Belt release of the northern part of our clients site. As a consequence, our clients site was included in the draft St Stephen Neighbourhood Plan as a residential development allocation. This was later removed from the plan, as indeed were all the Green Belt releases in the Neighbourhood Plan as Green Belt release were a matter for the Local Plan and its policies, not the Neighbourhood Plan. Of particular note, is the Councils latest Green Belt Study upon which it relies for the Local Plan, the site was only considered as a whole unlike previously where the northern area was separated out from the remainder.

In addition the Green Belt Study in reaction to our clients site, identifies Green Belt Purpose 2 incorrectly; Purpose 2 as submitted in our Hearing Statement relates to Towns, not villages and How Wood is identified as a village in the Settlement Hierarchy. It has therefore been wrongly scored in the Green Belt Study. It is evident the site therefore does not serve Purpose 1 as per the study, does not serve Purpose 2, does not serve Purpose 4 as per the Study and does not serve Purpose 5. The only Purpose the site may serve is the extent to which Purpose 3 applies and what weighting it should be given, bearing in mind it was the northern area which previous Green Belt Studies had identified.

Our clients take issue that referenced in para 1.11 “that every reasonable effort has been made to identify and assess all potential sites in the District”. Clearly it has not, since the Green Belt Study did not consider the earlier reports and the area of land to which that related. Had it undertaken a Green Belt assessment on the land previously identified for residential development it could have come to a different conclusion.

As have previously pointed out the Pro Forma C-228 has a number of inaccuracies, which has affected the scoring of our client's land at Park Street Lane. Firstly the Pro Forma has a Weak scoring against distance to the nearest Bust Stop (with at least peak hourly service). In fact this should have scored Strong as there is a Bus stop immediately adjacent to the site which has a regular 1 hourly bus service (361) and a further service 635. Our Hearing Statement provides copies of the Bus Timetable to prove the point. We are happy to provide this again on request.

The Proforma also refers to other inaccuracies, 1) the site is not contaminated, its use has only been as pasture land, there has been no leaching from a landfill site, indeed had there been the Environment

Agency would have taken action in relation to the water course to the east of the site. 2) the nearest primary school is 1 kilometre, not 1.5 kilometres.3) The site is 800 metres from the Neighbourhood Centre not 1 kilometres 4) the travel distance to the SSSI and Country Wild Life Park is 1.6 Kilometres.

An accurate assessment and scoring of our clients site would show it has 16 Strong, 10 Medium and 5 Weak. This score places it better than 11 other sites which the Council has included for Green Belt release.

It is evident the approach adopted by the Council is far from being “thorough or consistent” (Para 1.10) when it comes to the Green Bet Study and the Proforma analysis due to inaccuracies in both.

On the wider issue of the Councils urban sites, we have identified in our Hearing Statement that many are not deliverable due to development constraints. Many of these sites are under the control of the Council or where the Council has a land interest in common with others, for instance a number of the garage sites are subject to accesses serving properties which surround. Many the garage sites are back land sites which have accesses that are currently not capable of serving residential development to a minimum standard of a 4.1 metre carriageway plus 2 metre wide footpath. Measurements taken show a number only have 3.1 metre wide accesses. The accesses would require radius kerbs and visibility splays which due to the adjoining properties to the accesses is not achievable. The inclusion of city car parks which are at capacity during peak periods would require excessive build costs if, as the Council has gone on record to say, the number of car spaces available will not reduce. This inevitably means expensive decked parking, but there is no feasibility or viability whether this would be economic. In the circumstances these sites cannot be relied upon to deliver housing. The inclusion of Sainsbury's and Waitrose car parks are highly suspect for residential development given the importance that availability of car spaces provides to the retail operations on each site, the retail purpose of which is to cater for car borne shoppers. Without evidence that it is commercially viable for these sites to be developed for an alternative use they should be removed from the list of urban sites which would be available during the plan period. In short many of the identified urban sites are not realistically deliverable for residential development. In the absence of crucial evidence regarding the realistic prospect sites can be developed, they should be removed from the plan housing numbers. It is evident from the Councils web site that notwithstanding the acute shortfall in housing supply within the district these urban sites are not the subject of planning applications. The Council has a substantial housing land supply issue resulting in planning by Appeal and yet has been unable to unlock sites it owns for housing to increase the land supply. All this points that our assessment has merit; these sites are not deliverable for a number of different development reasons.

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