

Examination of the St Albans City and District Local Plan Matters, Issues and Questions for Stage 2

**Statement on behalf of the owners of Land North of
Oakwood Road**

(Representor ID – 153)

Matter 7 – Issue 6 – Bricket Wood Site Allocations

Policy M4/OS1 – North of Oakwood Road, Bricket Wood, AL2 3PT

DLA Ref: 24/240

October 2025

1.0 Introduction

- 1.1 This statement is submitted on behalf of the owner of Burston Nurseries and Burston Garden Centre being the owners of land North of Oakwood Road, Bricket Wood, AL2 3PT ('the Site'). Representations have been made to Regulation 18 and Regulation 19 draft Local Plan consultations promoting the allocation of the Site for residential and community purposes.
- 1.2 This statement provides a response to the Inspectors' questions Q1-Q5, raised in respect of Policy M4/OS1 (North of Oakwood Road) under Matter 7 (Residential Site Allocations) and Issue 6 (Bricket Wood Site Allocations).
- 1.3 The owners of the Site support the proposed allocation for residential and community purposes. Pre-application feedback has been obtained from Herts Highways, demonstrating the owner's commitment to delivering this Site.

2.0 Question 1 – What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

2.1 The Council has already set out the exceptional circumstances that necessitate changes to the Green Belt boundary. In summary, there is a high level of housing need that has largely gone unmet since the adoption of the last Local Plan in 1994 and there is demonstrably insufficient land within the urban areas to meet this need. Green Belt land inevitably needs to be released and it is then a question of which are the least harmful and most appropriate sites for release.

2.2 Land North of Oakwood Road was recommended for consideration through the Green Belt Review. Arup's conclusion in respect of parcel SA-161 was that its release was *"unlikely to significantly harm the performance of the wider Green Belt"*.

2.3 With regard to the impact to Green Belt boundary strength, the new boundary is considered to be both readily recognisable and permanent. Whilst the Site is open and undeveloped, it displays strong urban characteristics by reason of the M25 and the A405, and the fact all remaining boundaries are bound by residential properties in Bricket Wood. The Site is completely contained on all sides by the following readily recognisable and permanent physical features:

- The A405 (North Orbital) contains the Site along a large section of the north/north-west boundary.
- The Site is bound by the M25 and a vegetated noise attenuation bund along its north/north-eastern edge.
- To the south is a mature tree line and properties on the north side of Oakwood Road.
- The south-eastern boundary of the Site comprises a denser area woodland with a number of TPOs (known as Five Acres).
- Further to the south-west and west are residential dwellings off Garnett Drive and Meadow Close.

2.4 In light of the above, the new Green Belt boundary will consist of established physical features that are readily recognisable and are likely to be permanent in accordance with

paragraph 148 (f). The Green Belt boundary will therefore not need to be altered at the end of the Plan period.

3.0 Question 2 – Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

3.1 Our response to this question is covered above – Green Belt land is required to meet housing needs and this Site has been identified as being capable of release without harming the wider Green Belt.

4.0 Question 3 – What is the justification for separate allocations, rather than a single site covering M4 and OS1? Is it sufficiently clear what is required by Policy M4(1) which refers to co-ordination between the two sites?

4.1 Separate allocations makes sense to avoid delays in delivering housing. The Council's revised Housing Trajectory in ED85A has brought forward the delivery of small to medium sites by two years (starting in 2027/28), and as a result, Policy M4 is likely to come forward at a faster rate due to the urgent need for housing earlier on in the plan period. Although it is anticipated that the community land will be delivered within the time frames expected of the M4 allocation, as there will be extensive consultation with all local authorities, residents and the wider community to ensure that the right type of community facility is delivered, it seems sensible to distinguish between the separate allocations.

4.2 In terms of co-ordination, the owner of the Site has received highway pre-application feedback on an access arrangement that will serve both allocations. This will ensure that development on one part of the Site will not prejudice the other. The Owners' understand that this is the level of coordination required to effectively deliver both allocations.

5.0 Question 5 – Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

5.1 The current access strategy incorporates an 'in' only access from The Meads/Woodside Road and a left in/left out only access on to the A405 North Orbital Road. Key Development Requirements (3) suggests that no access can be achieved from the A405, as it is not likely to be acceptable in either technical or policy terms. However, this ignores the fact there is already an existing access into the Site from the A405 that was previously used by construction traffic transporting earth into the Site from the M25 widening. The existing access also includes a deceleration lane for the left in turn.

- 5.2 Policy 5 of Hertfordshire’s Local Transport Plan (LTP) states that they will *“only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of proposals”*. HCC Highways has advised that special circumstances can result from an allocation in the Local Plan. As exceptional circumstances exist to alter Green Belt boundaries which will result in an allocation, then the ‘special circumstances’ test will be met, permitting as a matter of principle, an access on to the North Orbital (A405).
- 5.3 Furthermore, the Site will deliver much needed housing in the District, as well as a community use in a location where there are limited facilities for local people. There will also be upgrades to the rights of way network, improving permeability between Bricket Wood, How Wood and Chiswell Green. It is therefore considered that the Site should have the option to seek an access strategy from the North Orbital under special circumstances.
- 5.4 With regards to upgrades to the bridge at J21a, it is understood that these will be delivered as part of the SRFI works. Whilst no specific plans for the upgrades are available in the public domain, it is expected that the developer will need to consult with National Highways to understand how the proposed scheme should link into these infrastructure works. Proposals will also need to provide compliant shared use widths from Footpath 29 onto the bridge (at Junction 21a) at the north-western boundary to maintain continuous walking and cycling routes to Watford and St Albans.
- 6.0 Question 6 – Are Policies M4/OS1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?**
- 6.1 The Owners of the Site endorse their support for the allocation of M4/OS1 in the draft Local Plan. However, the Key Development Requirement (3) should be reworded to account for the flexibility offered in Policy 5 of the LTP:
- “In the event an access is proposed off the A405, full technical details should be provided to demonstrate a safe and suitable access in compliance with current guidance ”*
- 6.2 Other than the above modification, we consider the requirements of the policy are considered to be justified, effective and consistent with national planning policy.

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