

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

Statement on behalf of the owners of the Albert Bygrave Retail Park

(Representor ID – 84)

Matter 7 – Issue 1 – St Albans Site Allocations

Policy P2 – Land at North Orbital Road, St Albans

DLA Ref: 97/098

September 2025

Introduction

1. This statement is submitted on behalf of the owners of the Albert Bygrave Retail Park (Stephen and Moira Bygrave and Quinn Construction) at North Orbital Road, St Albans, AL2 1DL ('the Site'). Previous representations have been made to Regulation 18 and Regulation 19 draft Local Plan Consultations promoting the allocation of the Site for residential purposes.
2. This statement provides a response to the Inspectors' questions Q1-Q3, raised in respect of Policy P2 (Land at North Orbital Road) under Matter 7 (residential site allocations) and Issue 1 (St Albans site allocations).
3. The owners of the Albert Bygrave Retail Park support the proposed allocation of the site for residential purposes.

Question 1 – current use and availability for development

4. The Inspectors ask at **Question 1**: *“What is the current use of the site and is it available for development within the plan period?”*
5. The site is currently in use as the Albert Bygrave Retail Park. It contains a number of businesses offering a range of products and services, including the following:
 - Loaf furniture store
 - Costa Coffee
 - Arlo & Jacob Ltd furniture store
 - Pets Corner
 - Wenzel Bakers
 - Maidenhead Aquatics
 - Dominos Pizza takeaway
 - Giant Bicycles
 - OMG cosmetic dentist
 - Herts Garden Buildings Ltd
 - Mr GB Glass Ltd
 - George Davies turf and stone supplies
6. The existing uses occupy the site under the terms of various lease agreements that expire at various times. Many of the leases expire in the next 2/3 years or contain a break clauses that would enable the site to be redeveloped.
7. The freehold is split into a number of parcels. Parcels HD266571, HD193746, HD271145 and HD193745 are owned by Stephen and Moira Bygrave. Parcel HD623985 is owned by Quinn Construction. Both landowners support the proposed Local Plan allocation.
8. The landowner has been pursuing residential development on the site through the Local Plan process for many years, including Call for Sites submissions in 2016 and 2021. Residential development remains their long-term intention, notwithstanding the current uses on site.
9. The NPPF definition of “developable” sites is that they *“should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”*. The site is located on the edge of St Albans, within walking distance of key services and facilities, including a primary school, a secondary school, leisure centre and local retail facilities. As such, the location is considered sustainable. The arrangement of leases and break clauses on the site means that there is a reasonable prospect that the site will be available for development within the plan period.

Question 2 – retention of the site with the Green Belt

10. The Inspectors ask at **Question 2**: “What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?”
11. The Council is best placed to respond to this question. However, from our understanding, the approach to the Green Belt stems largely from the findings of the Green Belt Review. Where sites were recommended for release, these have largely been taken forward. Very few sites were taken forward that were not recommended for release in the Green Belt Review. As Site P2 was not recommended for release, it has not been considered.
12. We feel that the site could have been taken out of the Green Belt, given the scale of built development on this site and adjoining sites and the urban nature of the environment. An alternative Green Belt boundary could have been created that excluded the Albert Bygrave Retail Park, Ayletts Nursery and the suburban development along London Road. An illustration of such a boundary is set out below. The existing Green Belt boundary is shown with a solid green line, the alternative Green Belt boundary is illustrated with a dotted black line, while the Albert Bygrave Retail Park is outlined in red.

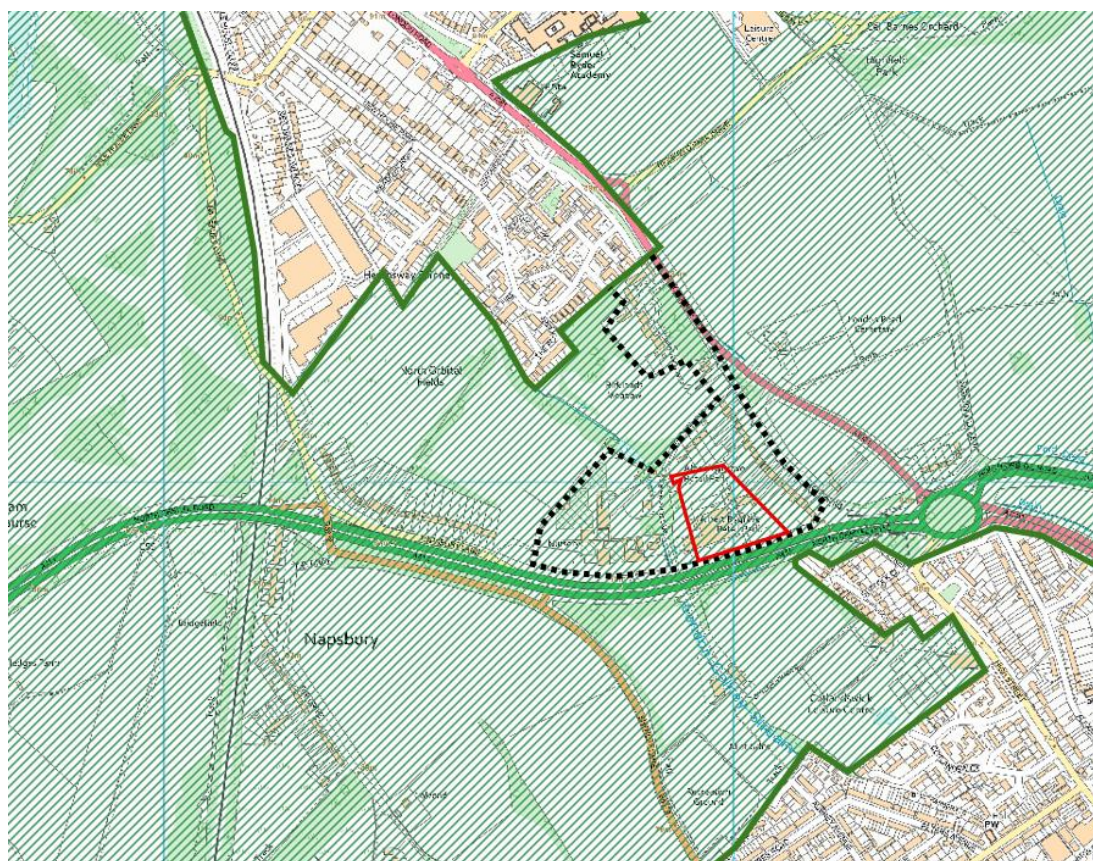


Figure 1: proposed alternative Green Belt boundary

13. The above proposed boundary obviously reduces the gap between St Albans and London Colney to the south-east. However, this boundary simply reflects the reality of the gap between these two settlements, where development exists either side of the dual carriageway. London Colney is not a “town” as defined in the Council’s Green Belt Review so the coalescence of towns is not at issue here.
14. If a decision is taken not to remove the site from the Green Belt, we set out in our Regulation 19 representations (paras 4.4 and 4.5) how the NPPF allows the redevelopment of previously developed sites. This applies to both the version of the NPPF under which this draft Local Plan is being examined and to the current version under which a subsequent planning application would be considered.
15. The redevelopment of previously developed sites is permitted providing “substantial harm” is not caused to the openness of the Green Belt. “Substantial harm” is a high bar, particularly given the existing development on the site, and would allow considerable redevelopment to take place. Paragraph 4.5 of our Regulation 19 representations suggests that Policy P2 be amended to specifically state that the redevelopment of the entire site is consistent with paragraph 154g of the NPPF. Such an amendment would improve the deliverability of this site allocation and aid the determination of future planning applications at the site and we continue to advocate this change.

Question 3 – soundness of Policy P2

16. The Inspectors ask at **Question 3**: *“Is Policy P2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?”*
17. The owners of the Albert Bygrave Retail Park support the allocation of site P2 in the draft Local Plan. Subject to the suggested addition at paragraph 13 above, we consider that the policy is justified, effective and consistent with national planning policy and should therefore be found sound.

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