

# 25 January to 5pm 8 March 2021 'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- · Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

### Please do not submit sites that:

 Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the <u>form and site location plan</u> to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

# By online consultation portal:

http://stalbans-consult.limehouse.co.uk/portal/

By e-mail to: planning.policy@stalbans.gov.uk

**By post to:** St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

Your Details	
Name	Simon Andrews
Company/Organisation	DLA Town Planning Ltd
Address	5 The Gavel Centre, Porters Wood
Postcode	AL3 6PQ
Telephone	
Email	
Your interest	□Site Owner X Planning Consultant □Registered Social Landlord □Local Resident □Developer □Community □Other

Site Details		
Requirements:  • Delivers 5 or more dwellings or;  • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)		
Site address/location (Please provide a map showing the site boundary)		03 and 105 Dunstable Road, Redbourn
Site area (in hectares)	2.2 ha	
Coordinates	Easting	Northing
Site Location Plan Attached	X Yes □No	
GIS mapping shapefile attached (in .shp file format)	□Yes X No	
Landownership (please include contact details if known)		37 – owned by Mr & Mrs Dunworth 3 – owned by Ms Carr
Current land use	Part resid	lential, part cattery
Condition of current use (e.g. vacant, derelict)	Occupied	
Suggested land use	☐ Mixed☐ Emplo☐ Renev X Biodive X Green☐ Land	& Travellers Use (please specify)
Reasons for suggested development / land use		e is suitable for development, with the opportunity to provide an area of open inting to the rear

development / land use	delivery of suggested development / land	☐ 11-15 Years
------------------------	--	---------------

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes x No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes x No
	Flood Risk	☐ Yes x No
	Topography affecting site (land levels, slopes, ground conditions)	□ Yes x No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	x Yes No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	□ Yes x No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	x Yes  No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	☐ Yes (If yes, please specify) x No
Planning Status	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice x Planning Permission Not Soug ☐ Other Please include details of the abort	ght ove choice below (for example
Other comments	See accompanying letter	



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- Gypsy & Traveller Housing
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Telephone		
Email		
Your interest	□Site Owner X Planning Consultant □Registered Social Landlord □Local Resident □Developer □Community □Other	

Site Details			
Requirements: Delivers 5 or more dwellings or; Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)			
Site address/location (Please provide a map showing the site boundary)		Dunstable Ro	ad, Redbourn
Site area (in hectares)	0.4ha		
Coordinates	Easting	510283	Northing 213158
Site Location Plan Attached	X Yes □No		
GIS mapping shapefile attached (in .shp file format)	□Yes X No		
Landownership (please include contact details if known)	Jarvis		
Current land use	Recreat	ion	
Condition of current use (e.g. vacant, derelict)	Occupie	ed	
Suggested land use	☐ Mixed☐ Emple☐ Rene☐ Biodie☐ Gree☐ Land	y & Travellers d Use (please oyment wable and lo versity Impro	e specify) w carbon energy and heat vement / Offsetting ensatory Land ating
Reasons for suggested development / land use	Neighbo	urhood Plan	een supported in the emerging for Redbourn and were only removed I issues about Neighbourhood Plans.

delivery of suggested	☐ 11-15 Years
use	□ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	X No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes X No
	Flood Risk	☐ Yes X No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes X No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	X Yes □ No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	□ Yes □ No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	X Yes ☐ No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	☐ Yes (If yes, please specify)☐ No
Planning Status	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice ☐ Planning Permission Not Sou ☐ Other Please include details of the abort	ight  ove choice below (for example
Other comments		







# LAND NORTH OF BLACKHORSE LANE & LAND AT DUNSTABLE ROAD, REDBOURN

St Albans Call for Sites response 2021

Planning Report on behalf of Jarvis Homes Ltd

DLA Ref: 04/249 & 10/113

February 2021

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### 1.0 INTRODUCTION

- 1.1 This report is submitted in response to the Call for Sites on behalf of the owners of the land north of Blackhorse Lane and land at Dunstable Road, Redbourn. The sites are being promoted for residential development.
- 1.2 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 1.3 The two proposed housing elements of the report site have previously been supported in the emerging Neighbourhood Plan for Redbourn and were only removed because of procedural issues about Neighbourhood Plans allocating sites ahead of the Local Plan. The local support for this site is an important consideration for the Local Plan site assessment process.
- 1.4 Redbourn is a well serviced settlement with good levels of existing facilities and is clearly a sustainable location for growth.

  The report site is well located in relation to key services and facilities and is within walking distance of schools, shops, health

and leisure facilities. It lies adjacent to a bus stop and 5.4km from the railway station.

- 1.5 The site off Blackhorse Lane has built development to the west, south and east, with the recreation ground to the north. The site off Dunstable Road has built development to the north and south, with the recreation ground to the west. Given the pattern of existing development, the site will not extend the built envelope of Redbourn any closer to neighbouring settlements so will not cause coalescence in any form.
- 1.6 There are no constraints that would prevent development. The loss of playing field land will need to be addressed but the improvements in the quality of sports provision which could result from the proposals would outweigh the loss.
- 1.7 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.
- 1.8 The site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.



### 2.0 SITE & CONTEXT ANALYSIS

#### 2.1.0 Location

The first part of the Report Site is located on the northern side of Blackhorse Lane to the western side of Dunstable Road. Adjoining the site to the west is St Luke's School and to the east is Redbourn Recreation Centre.

- 2.1.1 The land comprises an irregular shaped parcel of land that is currently vacant and open. There is an existing mature hedgerow to the frontage with Blackhorse Lane whilst the rear boundary is open. The site extends back from Blackhorse Lane by some 65m.
- 2.1.2 Abutting the first part of the Report Site to the east is the Redbourn Recreation Centre building and extensive area of associated car parking. Between the centre and Blackhorse Lane are detached residential properties set in extensive grounds.
- 2.1.3 Abutting the first part of the Report Site to the west are the educational buildings and grounds of St Luke's School.
- 2.1.4 The second part of the Report Site is located on the western side of Dunstable Road and to the north of Blackhorse Lane. Adjoining the site to the south is the Redbourn Recreation Centre and to the north is Datalogic House.

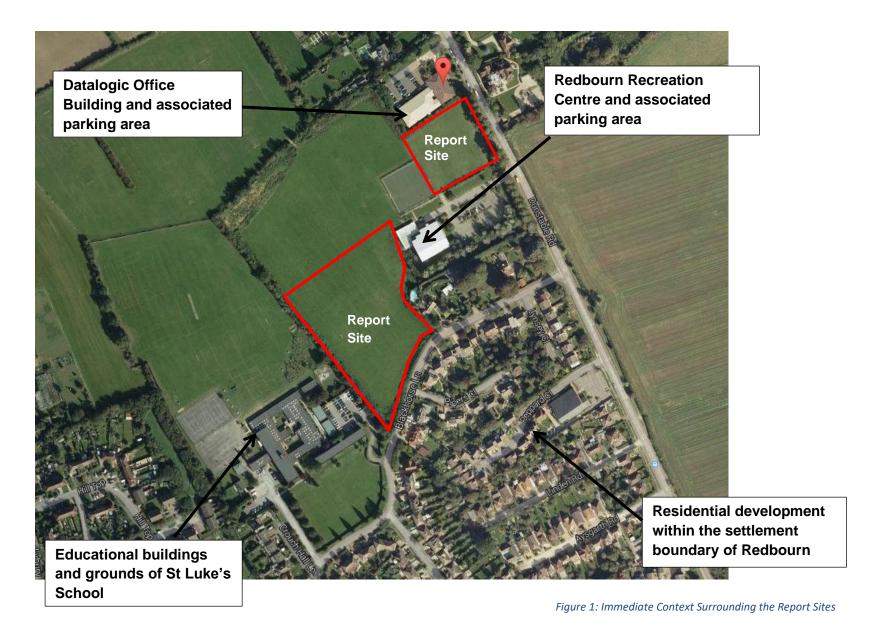
- 2.1.5 The second part of the Report Site comprises a square parcel of land that is currently vacant. It has a width of 75m narrowing to the rear and a depth of 71m. There is an existing mature tree screen to the frontage with Dunstable Road whilst the rear boundary is open.
- 2.1.6 Abutting the land to the south is the Redbourn Recreation Centre building and extensive area of associated car parking. The building is set back from the road by some 80m and consequently is set behind the rear boundary of the Report Site.
- 2.2.3 Abutting the second part of the Report Site to the north is the substantial office building of Datalogic and extensive area of associated car parking.

#### 2.2.0 **Context & Land Uses**

The Report Sites are both currently part of the playing fields around Redbourn Recreation Centre which the landowner allows the Redbourn Playing Fields Trust the use of free of charge.

2.2.1 The immediate locality around the site comprises the following elements as identified on the location plan opposite:







#### 2.4.0 Access

The proposed site layout shows that each of the parts of the Report Site would be accessed independently. The first part from Blackhorse Lane at two points and the second part from Dunstable Road via a single access.

### 2.5.0 **Development Plan Notation**

The proposals map of the St Albans District Local Plan Review 1994 shows the Site within the Metropolitan Green Belt (MGB). The sites are not subject to any other designation or at risk from flooding.

#### 2.6.0 Local services

The Report Sites are well served by public transport and also benefits from good access to a range of local services and facilities. The site is within close proximity of the centre of Redbourn, which boasts a Co-operative food store, a dental practice, doctor's surgery, pharmacy and a range of other local facilities.

### 2.7.1 **Public Transport**

The nearest bus stop is located on Dunstable Road to the south of the Report Sites at the junction with Linden Road, and is served by bus nos. 34, 46, 647 and 657, which serve Flamstead, Dunstable and Luton in the north and St Albans and Hemel Hempstead in the south.

2.4.3 Harpenden Railway Station is 5.4km to the east of the Report Site providing frequent services to St Albans, St Pancras International, Gatwick Airport and Brighton to the south and Luton Airport, Luton and Bedford to the north.



### 3.0 STRATEGIC CONTEXT

- 3.1 This Call for Sites opportunity marks the start of a new Local Plan process. With the withdrawal of the draft Local Plan in 2020 following the withdrawal of the Strategic Local Plan in 2017, the need for an up-to-date strategic framework for development is more urgent than ever.
- 3.2 The objectively assessed housing need for St Albans district is around 900 dwellings per year. This should be the starting point. However, the Council will also be aware of neighbouring authorities that are struggling to meet their own housing requirements. The Council will need to have open and constructive dialogue with these authorities if it is to satisfy the Duty to Cooperate. The potential for St Albans district to assist with meeting housing needs from surrounding areas should not be dismissed at this stage. There is considerable development potential within the district, partly stemming from the fact that Green Belt boundaries have not been properly reviewed for around 35 years. The Council should not see the 900 homes per year target as a ceiling if greater potential emerges through the Green Belt review or other evidence.

### **Housing need**

- 3.3 The reliance on a Local Plan adopted in 1994 and the housing policies and land allocations therein has had a catastrophic effect on housing delivery within the district. With an annual housing target of around 900 homes per year and annual housing completions since 2001 running at 376 homes per year, a whole generation of young people have been largely unable to access the housing market. Recent performance can be judged by the latest Housing Delivery Test results for St Albans District (published in February 2021), which indicated a HDT measurement of only 63% for the period 2017/18 to 2019/20 the 33<sup>rd</sup> worst of the 298 local authorities in England.
- 3.4 While housing completions have, to a degree, been propped up by recent changes to permitted development rights, these have not had an impact on the delivery of affordable housing. The target of 200 affordable homes per year from the 1994 Local Plan has not been met. Since 1994, 1,826 affordable homes have been delivered, against a target of 5,200 only 34% of the target and a shortfall of 3,374 affordable homes. In 2019/20, only 31 affordable homes were completed just 7% of total completions.
- 3.5 The delivery of a new Local Plan with updated housing targets, new housing allocations and new Green Belt releases is of the utmost importance for the district.



# The portfolio of housing sites

- 3.6 To meet housing need will require the delivery of a mixed portfolio of housing sites. A range of sizes, types and locations will be needed to enable a wide range of housebuilding organisations to contribute to meeting needs, including arrangements for self-build properties.
- 3.7 The previous focus only on strategic sites of 500 dwellings or more must change. As highlighted by the Inspectors examining the now-withdrawn draft Local Plan, and as recognised by the Council's Planning Portfolio holder, small and medium-sized sites within the Green Belt must be seriously considered.

#### **Green Belt considerations**

3.8 The Council's Green Belt review from 2012 provides a useful starting point but is in no way adequate to support a new Local Plan. The focus on strategic sites must change and the Green Belt review must look at the site-specific impacts of proposed development sites. The broad-brush, coarse-grain approach to assessing parcels of Green Belt land in the 2012 Review must be developed into a more sophisticated and nuanced review of development potential. This will include both strategic and smaller-scale housing and employment sites.



# 4.0 **PLANNING HISTORY**

# 4.1.0 **Site**

The table below shows the relevant planning history for these sites.

LPA Reference	Proposal	Decision
5/1986/0018	Use of land for sports and recreation purposes. and erection of 7 detached bungalows.	Refused 24/4/86
5/1987/1379	Use of land for recreational purposes	Approved 5/11/1987
5/1988/0380	Erection of seven bungalows and double garages	Refused 26/5/88



## 5.0 PREVIOUS SHLAA ASSESSMENT

- 5.1.0 Both sites have been submitted through previous Call for Sites invitations and were assessed by the Council in the 2016 Strategic Housing Land Availability Assessment (SHLAA). At that stage the Council concluded in respect of the first part of the site, off Blackhorse Lane, that "development of this site (which comprises the southern part of existing playing fields lying to the south west of the Redbourn Recreation Centre) would result in infill within open countryside, would be visually intrusive from the surrounding countryside and would create additional development pressure on adjoining land. However, it is recommended that this site is shortlisted only so that it is looked at comprehensively with adjoining sites 138 and 266. Sport England would need to be satisfied that any loss of playing pitches would be reprovided to the same or better quality elsewhere and that the proposed development had wider benefits for the local community."
- 5.1.1 A consultation response was made to the 2016 SHLAA finding, commenting that the SHLAA repeats the findings of the Council's Green Belt Review in 2003, which stated that the site "clearly forms part of the built up area of Redbourn". The Review went on "Development of the site would undoubtedly have a visual impact on surrounding land, although this comprises playing fields, which have more of an urban fringe rather than rural

- character." It was also highlighted that the SHLAA itself raises concerns that seem to contradict the earlier findings, in that development "would result in infill within open countryside, would be visually intrusive from the surrounding countryside and would create additional development pressure on adjoining land". Nevertheless, the SHLAA concludes that the site is suitable for 45 dwellings. This conclusion was supported and continues to be so. The site was also included as a proposed site in the draft Neighbourhood Plan.
- 5.1.2 In respect of the second part of the site, off Dunstable Road, the Council rejected the site but gave no reasons as to why. A consultation response was made to the 2016 SHLAA finding, highlighting that the site was referred to in the conclusions in respect of the first part of the Report Site.
- 5.1.2 A new Green Belt boundary could be created along the edges of each site. New homes are needed within Redbourn and this site could be released without unduly affecting the wider purposes of the Green Belt, as set out in Section 8 below.
- 5.1.3 The Report Sites were previously supported by the Redbourn Neighbourhood Plan as a comprehensive proposal along with improvements to the sporting facilities at the recreation centre. The only reason the sites have not come forward is due the progress of the Neighbourhood Plan being hindered by the Local



Plan process and it being unable to remove the sites from the Green Belt.



### 6.0 **SITE CONSTRAINTS**

6.1.0 The Council's Call for Sites 2021 pro forma seeks information on any constraints affecting potential sites. While the constraints applying to this site are discussed throughout this report, the information is summarised here in the same format as requested on the pro forma, for ease of reference.

#### 6.2.0 **Contamination/Pollution**

No suspected issues of contamination or pollution that would preclude development.

#### 6.3.0 Environmental issues

No significant environmental constraints other than the site is located within the Green Belt.

#### 6.4.0 Flood risk

The site is located within Flood Zone 1 and therefore is at very low risk of flooding.

### 6.5.0 **Topography**

The site is essentially level such that large amounts of spoil would not need to be removed.

#### 6.6.0 **Utility services**

It is likely that utilities are available in Dunstable Road and Blackhorse Lane to which a connection could easily be made.

### 6.7.0 **Legal issues**

The sites are in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present.

#### 6.8.0 **Access**

The proposed site layouts show that the first part of the site would be accessed via two points from Blackhorse Lane and the second from a single access off Dunstable Road.

#### 6.9.0 Other constraints

The sites currently form part of the playing fields around the recreation centre and are therefore protected for that use, a planning application would have to demonstrate that the proposals met one of the exceptions Sport England's Playing Fields Policy and Guidance. It is considered that the intended provision of improved sports facilities, either indoor, outdoor or both would be sufficient to meet the tests of Sport England's exception 5 where the proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.



## 7.0 **OUTLINE OF PROPOSAL**

- 7.1 These representations are made behalf of Jarvis Homes Ltd in respect of the site north of Blackhorse Lane and land at Dunstable Road in Redbourn.
- An indicative layout has been produced showing how the site off Blackhorse Lane could accommodate 14 detached and semi-detached dwellings, comprising a mix of units. The proposed dwellings would follow a linear arrangement, replicating existing dwellings to the south of Blackhorse Lane. A well-established hedgerow to the front of the proposed dwellings would be retained in order to partially screen the development. There would be two openings along the existing hedgerow to serve as separate access points for the proposed dwellings. The remaining area of land would be donated to the Redbourn Recreation Centre.
- 7.3 An indicative layout has been produced showing how the site at Dunstable Road could accommodate 12 dwellings of varied sizes. The dwellings would be in sets of threes and would follow a linear arrangement in respect of the surrounding character. The mature tree line along the frontage would be retained to enhance screening. There would be a single opening along the existing tree line to serve as an access for the proposed dwellings.



7.4 On 21<sup>st</sup> November 2013, St Albans City and District Council's Cabinet approved the designation of the Neighbourhood Plan Area for Redbourn. Redbourn Parish Council held a consultation on both parts of this report site, as part of a larger location of



potential sites and have produced a site assessment. It recognised that the sites have good potential for development:

#### Land off Blackhorse Lane

"The site has good potential for development, having no significant constraints. It is reasonably located on the northern edge of Redbourn and within walking distance of the High Street and a bus stop. The potential to protect the existing playing field land adjacent to the Recreation Centre in order to offer improved space for outdoor sport/leisure represents a strong community benefit. However, there would be some loss of green space for leisure compared to the existing position."

#### Land at Dunstable Road

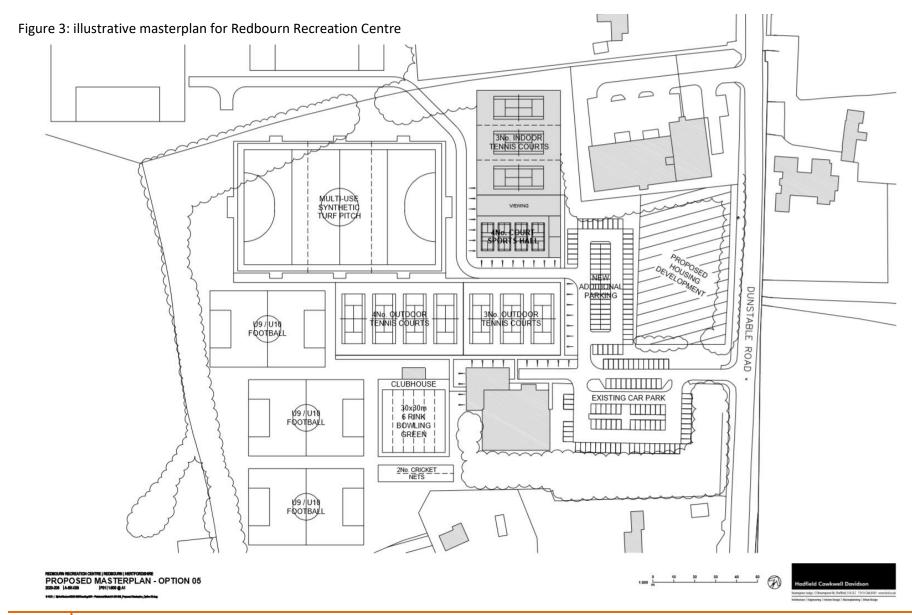
"It would be logical to develop this site together with Land north of Blackhorse Lane which would, in combination, make a significant contribution to addressing a range of housing needs".

7.5 As the sites currently form part of the playing fields around Redbourn Recreation Centre they are protected from development unless one of the five exceptions set out in the Sport England Playing Fields Policy and Guidance are met. The land is currently used by the Redbourn Playing Fields Trust for free and as part of the overall development proposals the developer intends to provide funding to improve facilities at the Recreation Centre as well as compensating for the loss of the areas of playing field. The remaining playing field areas owned

by the developer would be donated to Redbourn Recreation Centre.

- One of the exceptions which would allow Sport England to support the development of the sites would be that "The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field." It is understood that the Redbourn Playing Fields Trust has undertaken an assessment of the use of the existing facilities and has a number of identified improvements it wishes to make. One of the improvements is to provide a full-size, floodlit artificial pitch. The illustrative masterplan for the site is shown below at Figure Such provision would more than compensate for the land lost for the housing development given the increased hours of use an artificial, floodlit pitch can sustain.
- 7.7 The site was proposed to be allocated in the Pre-Submission Neighbourhood Plan (January 2018) under Policy RED8. However, as explained above, these allocations cannot be delivered until there is a change to the Local Plan, either to allocate the sites directly or to enable the Neighbourhood Plan to do so.
- 7.8 Whichever approach is taken, a change to the Local Plan is urgently needed.







### 8.0 **GREEN BELT IMPACT**

- 8.1.0 Paragraph 134 of the NPPF states that the Green Belt serves five purposes. These five purposes have been set out below with an assessment on the site's contributions to each purpose.
- 8.2.0 Purpose 1 to check the unrestricted sprawl of large built-up areas.

Whilst the site would extend the built-up area of Redbourn, it is not considered that this would be 'unrestricted sprawl'. The incorporation of the entire Report Site into the Redbourn Settlement boundary would essentially reflect the extent of the northern spread of built development and would be defined by the open space around the recreation centre.

8.3.0 Purpose 2 – to prevent neighbouring towns merging into one another.

The nearest town to the east of Redbourn would be Harpenden. The southern part of Redbourn already extends to the A5183 which is much closer to Harpenden than the Report Sites. The proposed development would extend built development slightly to the north. The nearest town to the north of Redbourn would be Luton, some 5.3km away. Development of these sites would not cause coalescence between towns. The sites are considered to make no contribution to this purpose.

8.4.0 Purpose 3 – to assist in safeguarding the countryside from encroachment.

The sites are contained with the recreation centre plot which extends beyond the Report Sites towards the countryside. In essence, they do not have sense of separation from the settlement of Redbourn and is largely suburban in character such that there is a very limited contribution to this purpose.

8.5.0 Purpose 4 – to preserve the setting and special character of historic towns.

The land does not form part of the setting of Redbourn or contribute to its special character. This should be limited or no contribution.

8.6.0 Purpose 5 – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is a common assumption that all Green Belt land within the District makes a significant contribution to this purpose.

8.7.0 **Summary of harm to Green Belt** 

Paragraph 133 of the NPPF stipulates that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are



their openness and their permanence". Thus, whilst openness is an essential characteristic, in assessing its importance this cannot be divorced from the overriding aim of preventing urban sprawl. This notion is supported by paragraph 139 of the Framework, with regard to Green Belt boundaries. This states that when defining boundaries, local planning authorities should, inter alia, "not include land which it is unnecessary to keep permanently open". As such, it is considered that the harm would be very limited for the following reasons:

- The site includes would involve the incorporation of what is now, a suburban, residential frontage given the existing housing and the recreation centre buildings and land which makes little contribution to the openness of the Green Belt.
- The land off Blackhorse Lane is enclosed to the east by housing and to the west by St Luke's School. To the south is Blackhorse Lane with residential development beyond. The Dunstable Road site is similarly enclosed on three sides by existing development. Given the surrounding development and the size of the sites it is not considered that they make any valuable contribution to the Green Belt.
- 8.7.1 In light of the above, there is limited value in retaining any part of the Report Site as designated Green Belt.

### 8.8.0 New position of Green Belt boundary

An alternative Green Belt boundary has been illustrated below in Figure 3 below. This would run along the rear of the proposed housing development on Blackhorse Lane, and then follow the line of the existing recreation centre buildings and the area proposed for expansion of the recreation centre. The proposed boundary would also exclude the Datalogic building a large, two-storey office building that does not need to remain in the Green Belt.



Figure 2: Existing & Proposed Green Belt Boundaries



## 9.0 **CONCLUSIONS**

16

- 9.1 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 9.2 The two proposed housing elements of the report site have previously been supported in the emerging Neighbourhood Plan for Redbourn and were only removed because of procedural issues about Neighbourhood Plans allocating sites ahead of the Local Plan. The local support for this site is an important consideration for the Local Plan site assessment process.
- 9.3 Redbourn is a well serviced settlement with good levels of existing facilities and is clearly a sustainable location for growth. The report site is well located in relation to key services and facilities and is within walking distance of schools, shops, health and leisure facilities. It lies adjacent to a bus stop and 5.4km from the railway station.
- 9.4 The site off Blackhorse Lane has built development to the west, south and east, with the recreation ground to the north. The site

- off Dunstable Road has built development to the north and south, with the recreation ground to the west. Given the pattern of existing development, the site will not extend the built envelope of Redbourn any closer to neighbouring settlements so will not cause coalescence in any form.
- 9.5 There are no constraints that would prevent development. The loss of playing field land will need to be addressed but it is considered that the improvements in the quality of sports provision which could result from the proposals would outweigh the loss.
- 9.6 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.
- 9.7 The site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.



#### **DLA Town Planning Ltd**

5 The Gavel Centre, Porters Wood St Albans, Hertfordshire, AL3 6PQ 01727 850907 dlaoffice@dlatownplanning.com www.dlatownplanning.com



By email to planning.policy@stalbans.gov.uk

Spatial Planning Team
St Albans City and District Council
Civic Centre
St Peters Street
St Albans
Hertfordshire
AL1 3JE

8 March 2021 My Ref: 21/110

Dear sir/madam,

RE: ST ALBANS LOCAL PLAN 2020-38 – CALL FOR SITES LAND AT 103/105 DUNSTABLE ROAD, REDBOURN

I write in response to your Call for Sites in association with the new Local Plan covering the period 2020-38.

Please find enclosed a Call for Sites submission on behalf of Jarvis Homes Ltd, who are working with the owners of the above site to promote it for residential development.

You will be aware of proposals for residential development to the south of this site, also promoted by Jarvis Homes Ltd, for which there was support in the emerging Neighbourhood Plan for Redbourn. There is merit in looking again at Green Belt boundaries in this location and, in doing so, the land at 103 and 105 Dunstable Road should also be included. Both sites are previously developed with substantial buildings on and relate far more closely to the built-up area of Redbourn than the countryside beyond.

I have attached an indicative layout for the site, which proposes built development near the Dunstable Road frontage with substantial areas to the rear that could be given over for public open space, for tree planting and for biodiversity enhancements. This area could then provide a long-term Green Belt boundary and a softer green edge to the village.

I would welcome the opportunity to discuss this site with you in due course. In the meantime, please do not hesitate to contact me if you have any queries.

Yours faithfully

Simon Andrews Strategic Planning Manager



# 25 January to 5pm 8 March 2021 'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- · Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

### Please do not submit sites that:

 Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the <u>form and site location plan</u> to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

# By online consultation portal:

http://stalbans-consult.limehouse.co.uk/portal/

By e-mail to: planning.policy@stalbans.gov.uk

**By post to:** St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

Your Details			
Name	Susan Cowen		
Company/Organisation			
Address			
Postcode	AL3 7PR		
Telephone			
Email			
Your interest	X Site Owner □Planning Consultant □Registered Social Landlord □Local Resident □Developer □Community □Other		

Site Details					
Requirements: Delivers 5 or more dwellings or; Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)					
Site address/location (Please provide a map showing the site boundary)	Land, gardens, and property at 103 Dunstable Road, Redbourn, Herts, AL3 7PR				
Site area (in hectares)	0.64				
Coordinates	Easting	Northing			
Site Location Plan Attached	X Yes □No				
GIS mapping shapefile attached (in .shp file format)	□Yes X No				
Landownership (please include contact details if known)	Ms Cowen (as above) – Title: HD414213				
Current land use	Residential				
Condition of current use (e.g. vacant, derelict)	Occupied				
Suggested land use	X Housing □ Gypsy & Travellers □ Mixed Use (please specify) □ Employment □ Renewable and low carbon energy and heat □ Biodiversity Improvement / Offsetting □ Green Belt Compensatory Land □ Land for Tree Planting □ Other (please specify)				
i use	required), a	port a row of dwellings (certainly in excess of the 5 as well as opening up public footpath to the field larger carriageway as an extra amenity benefiting nity.			

Likely timescale for	X 1-5 Years
delivery of suggested	□ 6-10 Years
development / land	☐ 11-15 Years
use	☐ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes X No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes X No
	Flood Risk	☐ Yes X No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes X No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	X Yes □ No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	☐ Yes X No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	X Yes ☐ No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

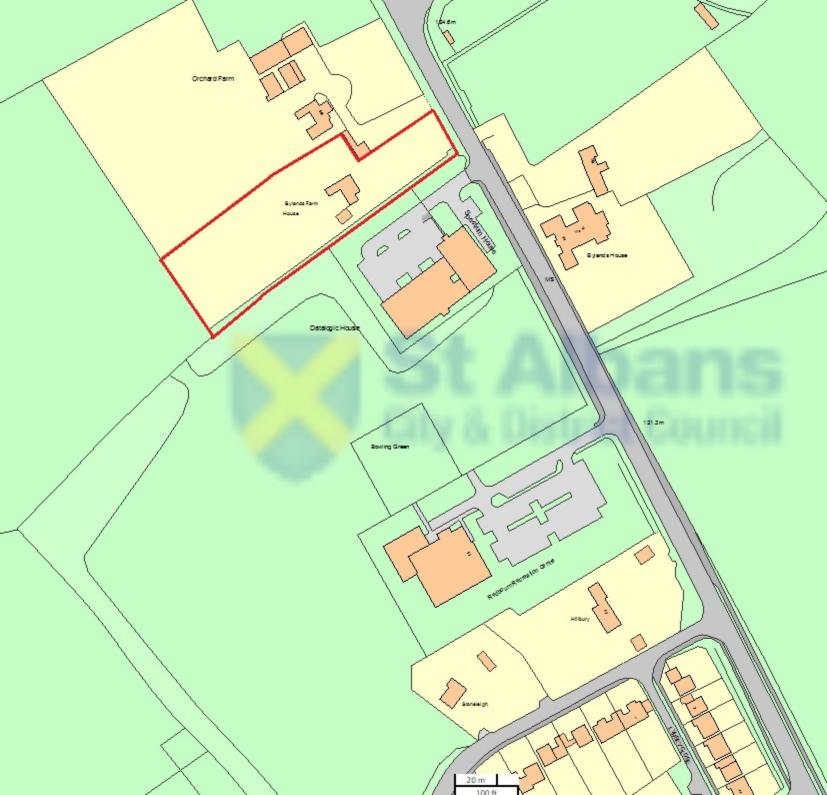
	Other constraints affecting the site	☐ Yes (If yes, please specify) X No
Planning Status	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice X Planning Permission Not Soug ☐ Other Please include details of the abort	ght  ove choice below (for example

## Other comments

Could support a row of housing off an access way widening the existing public footpath on the land to allow vehicular access to the housing and increased amenity to the users passing through to the playing fields behind. This may be put forward as part of a wider site with other landowners, but would also work on a standalone basis and be considered for both.

It is worth noting that in the last Green Belt review the land (18F) has the lowest contribution to the greenbelt of all the land assessed in the review. The site is already in residential use, has a very wide developed road which it is accessed from (with frequent buses), and has the motorway (M1) behind the sportfields to the rear of the Site).

At the middle of the where the site meets Dunstable Road (the road frontage) there is a bus stop on both sides of the road that enjoy extensive connections and frequent daily services. These provided bus routes direct to: St Albans Station & City Centre, Markyate, Flamstead, Dunstable, Luton, Hemel Hempstead and Harpenden; via a few different routes. These buses also directly service local schools.





#### Site address/location (Please provide a map showing the site boundary)

Bylands Meadow Dunstable Road Redbourn Hertfordshire AL3 7QB

#### Site area (in hectares)

2.43 hectares (approx)

## **Easting**

510448

## Northing

213311

Site Location Plan Attached

Yes

GIS mapping shapefile attached (in .shp file format)

No

Land ownership (please include contact details if known)

William Rose

## **Current land use**

Not in use

## Condition of current use (e.g. vacant, derelict)

Vacant

## Suggested land use

Housing

## Reasons for suggested development / land use

This plot of land has a natural boundary surrounding it, made up of both the A5 and Dunstable Road, so it is a defined plot of land where overdevelopment of the area would not be possible. Good access to the plot via Dunstable Road already exsits and the size of the plot would mean that it would not have a significant impact on traffic. It would enhance the aesthetics of the area as it is currently vacant and not in use, and it would be sympathetic to the current surroundings. It would have a benefit for the community and village econmically, but due to the natural boundaries a stretch on local infrastructure and resources would not a occur.

**Likely timescale for delivery of suggested development** 1-5 Years / land use

Contamination/pollution issues (previous hazardous land uses)	No	
Environmental issues (e.g. Tree Presentation Orders; SSSIs)	No	
Flood Risk	No	
Topography affecting site (land levels, slopes, ground conditions)	No	
Utility Services (access to mains electricity, gas, water, drainage ect.)	No	
Legal issues (For example, restrictive covenants or ownership titles affecting the site)	No	
Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	Yes	
Other constraints affecting the site	No	
Planning Status		
		Planning Permission Not Sought

## Other comments

Whilst 1-5 years is selected as the time frame for development, a longer time frame is also possible. There is a public footpath that goes through the site.







## 25 January to 5pm 8 March 2021 'Call for Sites 2021' Site Identification Form

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You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

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Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

## Please do not submit sites that:

 Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the <u>form and site location plan</u> to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

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By e-mail to: planning.policy@stalbans.gov.uk

**By post to:** St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

Your Details	
Name	Richard Hewitt on behalf of my Mother, Una Hewitt
Company/Organisation	Private
Address	
Postcode	HP2 7HT
Telephone	
Email	
Your interest	☑ Site Owner

Site Details				
<ul> <li>Requirements:</li> <li>Delivers 5 or more dwellings or;</li> <li>Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>				
Site address/location (Please provide a map showing the site boundary)	Eaton Lodge, Punch Bowl lane, Hemel Hempstead, Herts,			
Site area (in hectares)	2 hectares			
Coordinates	Easting 51.76927238673031 Northing -0.42344938237	36583		
Site Location Plan Attached	□Yes □No			
GIS mapping shapefile attached (in .shp file format)	□Yes □No			
Landownership (please include contact details if known)	Owned privately by my mother Una Hewitt. Contact details as above via Richard Hewitt.			
Current land use	Residential			
Condition of current use (e.g. vacant, derelict)	Good condition, Residential with two properties on title			
Suggested land use	<ul> <li>☑ Housing</li> <li>☐ Mixed Use (please specify)</li> <li>??</li> <li>☐ Employment</li> <li>☐ Other (please specify)</li> <li>???</li> </ul>			
Reasons for suggested development / land use	The property is on the perimeter (Punch Bowl lane) of what has been the East Hemel development and now part of the Hemel Garden Communities Programme. As such our family is interested in putting forwards for possible inclusion in the planning discussions.			

Likely timescale for delivery of suggested development / land use	☐ 1-5 Years ☐ 6-10 Years ☐ 11-15 Years ☐ 15+ Years	
Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes ☑ No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes ☑ No
	Flood Risk	☐ Yes ☑ No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes ☑ No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	☑ Yes □ No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	☐ Yes ☑ No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	☑ Yes ☐ No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	☐ Yes (If yes, please specify) ☑ No
	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice ☐ Planning Permission Not Sou ☐ Other Please include details of the abort	ight  ove choice below (for example
Other comments	<mark>???</mark>	



Richard Hewitt
6th March 2021
Hemel Garden Communities Programme Team Ian Charie.
Dear lan,
I am writing on behalf of my mother Una Hewitt. who is the owner of the residence known as:-
Eaton Lodge, Punch Bowl Lane, Hemel Hempstead, Herts, HP27HT
I understand there is a deadline for <i>Call for Sites submissions</i> is this Monday (8 <sup>th</sup> March).
I have also read your letter to landowners dated 19 January 2021. We are very interested to hear more.
I have spoken with my mother and we would like to have the property (Eaton Lodge) considered for future discussions as part of the HGC intuitive.
I am currently resident in and can be contacted via if needed.
Sincerely,
Richard Hewitt on behalf of Una Hewitt









## **Hemel Garden Communities Programme Team**

Telephone E-mail:

Date: 19 January 2021

Landowner of Breakspear Paddocks C/O DLA Town Planning 5 The Gavel Centre Porters Wood St Albans AL3 6PQ

Dear Hemel Garden Communities area Landowner,

## **Hemel Garden Communities initiative**

I write as Programme Director for the Hemel Garden Communities (HGC) Team to you as a landowner (or representative) within the area included in the proposed HGC area initiative, and as an update since the HGC Team last wrote to you in July 2020.

As well as introducing myself, I want to set out some background on the initiative, and some context and next steps as part of a future ongoing dialogue for the HGC proposals.

Firstly, I joined the HGC Team as Programme Director towards the end of July 2020, and the last 6 months has entailed undertaking early partnership working to progress technical, governance and programming aspects for proposals, including consultation on a Spatial Vision for the area, to meet the following Mission Statement:

'Supported by Garden City Principles, Hemel Garden Communities will take the best of the New Town heritage into the 21st century with over 11,000 homes and 10,000 jobs and Hertfordshire Innovation Quarter at its heart, anchoring the transformation of Hemel Hempstead and the wider area.'

The proposed development area comprises land to the north and east of Hemel Hempstead, and is split approximately evenly across both Dacorum and St. Albans boundaries. The HGC Programme area includes existing Hemel Hempstead to ensure that transformative benefits – including transport and green-link connections, are achieved through the development.

Garden Community status was awarded to Dacorum Borough Council (DBC), St. Albans District Council (SADC) and Hertfordshire County Council (HCC) in March 2019 by the Ministry of Housing, Communities and Local Government. In conjunction with the Hertfordshire Local Enterprise Partnership (LEP), the above partnership is working with many stakeholders to progress these proposals, including the majority landowner The Crown Estate (TCE), who own some 66% of land. Please see attached Plan. More information on HGC is available at www.dacorum.gov.uk/hemelgardencommunities.

I want to update you as a key stakeholder on 3 aspects in particular:

 The overarching, high level **Spatial Vision** for the area is being reported to DBC Cabinet on 19 January, SADC's Planning Performance Committee (PPC) on 2 February and HCC's Growth, Infrastructure, Planning and the Economy (GrIPE) Panel on 4 February. A Draft version of the Vision document is/will be available on the authority websites 1 week before the above meetings.

A series of engagement and consultation activities took place in the preparation of this document - modified to address restrictions arising from Covid 19 - including the

establishment of the social media based 'Hemel Channel' (an inter-active Instagram platform as advised in the July letter to landowners), outreach to schools and other groups via the Hemel Channel and websites and a stakeholder and public Workshop held on 27 July which included over 40 interested parties. The Vision document has had considerable input from all Programme partners, including an HGC Councillor Visioning Group, comprising 5 Councillors from each of DBC and SADC, and one from HCC, and also from DBC's Strategic Planning and Environment Overview and Scrutiny Committee.

The Spatial Vision follows on from Town & Country Planning Association Garden City Principles, and, in turn, the Hemel Garden Communities Charter (November 2018) and sets the ambition for the HGC initiative from which further masterplanning and design will follow.

We will be interested in any comments you wish to make at this stage. A copy of the final Vision document will be sent to you in March after final amendments have been made to the current draft. The Spatial Vision will be reviewed within 5 years.

- 2. A Framework Plan will be commenced in the coming months, led by TCE's Consultant Team in partnership with the HGC Team, for the whole of the HGC Programme Area. As well as the HGC Development area (land north and east of Hemel), this includes connections and transformative change within the wider Town area. This Plan will respond to the Spatial Vision, and wider Charter and Principles, referred to above and set the context for future parcel masterplanning within the HGC area. This exercise will be completed by late summer 2020, and become the basis for future Interim Planning Guidance, and ultimately Supplementary Planning Documents (SPDs), in conjunction with parallel progress on both Districts' Local Plans.
- 3. **Future Engagement** opportunities as part of the above process will be notified to you in early Spring, envisaging that there will be a number of Workshop or engagement activities to ensure collective and individual landowner inputs to this exercise for example key connectivity for various transport modes, general locations for local centres and other key facilities but NOT to get involved in masterplanning or detailed site planning. It is important that a comprehensive, rather than piecemeal, approach is taken in this exercise.

I, and the wider HGC Team and Partners, hope this update has been helpful to you. We are, still, at the very early stages of progressing the programme which is part of wider ambitions within South-West Hertfordshire, and across the County, for achieving sustainable growth to address the many challenges we face – for new housing, and jobs, to be delivered in a balanced way which meets the needs of a future based on low carbon and climate resilience, new homes, facilities and infrastructure to meet the needs of future communities, healthy living and wellbeing, and neighbourhoods, with local community and economic activity, which enable more sustainable forms of movement, and less reliance for local journeys on the private car.

We look forward to engaging with you more and more over the coming months and years. Please feel free to contact the HGC Team at or directly with myself at As Programme Director, although I have a Dacorum email address, I work to the HGC Board, and am therefore responsible to all 3 local authorities, and the LEP. We look forward to hearing from you. If there are any updates in contact or land ownership details, please advise.

Yours Sincerely,

lan Charie HGC Programme Director

11<sup>th</sup> Feb 2021

## Dear sir

Further to your requests for sites to be included within the next Local Plan I wish to submit the enclosed plan with the area concerned coloured in pink, for consideration to allow the building of a care home for local use

There would also be room for a block of 6 flats to accommodate the carers

Thanking you in anticipation A.H Taylerson (Owner)



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- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

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We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

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**By post to:** St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

Your Details		
Name	Simon Andrews	
Company/Organisation	DLA Town Planning Ltd	
Address	5 The Gavel Centre, Porters Wood, St Albans	
Postcode	AL3 6PQ	
Telephone		
Email		
Your interest	□Site Owner X Planning Consultant □Registered Social Landlord □Local Resident □Developer □Community □Other	

Site Details				
<ul> <li>Requirements:</li> <li>Delivers 5 or more dwellings or;</li> <li>Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>				
(Please provide a map showing the site boundary)		rth Blackhors	se Lane, Redbourn	
Site area (in hectares)	1.2ha			
Coordinates	Easting	510211	Northing 212997	
Site Location Plan Attached	X Yes □No			
GIS mapping shapefile attached (in .shp file format)	□Yes X No			
Landownership (please include contact details if known)	Jarvis			
Current land use	Recreat	ion		
Condition of current use (e.g. vacant, derelict)	Occupie	ed		
Suggested land use	☐ Mixed☐ Emple☐ Rene☐ Biodie☐ Gree☐ Land	y & Travellers d Use (please oyment wable and lo versity Impro	e specify) w carbon energy and heat vement / Offsetting ensatory Land hting	
Reasons for suggested development / land use	Neighbo	urhood Plan	een supported in the emerging for Redbourn and were only removed all issues about Neighbourhood Plans.	

delivery of suggested	☐ 11-15 Years
use	□ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	X No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes X No
	Flood Risk	☐ Yes X No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes X No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	X Yes □ No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	□ Yes □ No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	X Yes ☐ No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	☐ Yes (If yes, please specify)☐ No
Planning Status	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice ☐ Planning Permission Not Sou ☐ Other Please include details of the abort	ight  ove choice below (for example
Other comments		





## LAND NORTH OF BLACKHORSE LANE & LAND AT DUNSTABLE ROAD, REDBOURN

St Albans Call for Sites response 2021

Planning Report on behalf of Jarvis Homes Ltd

DLA Ref: 04/249 & 10/113

February 2021

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## 1.0 INTRODUCTION

- 1.1 This report is submitted in response to the Call for Sites on behalf of the owners of the land north of Blackhorse Lane and land at Dunstable Road, Redbourn. The sites are being promoted for residential development.
- 1.2 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 1.3 The two proposed housing elements of the report site have previously been supported in the emerging Neighbourhood Plan for Redbourn and were only removed because of procedural issues about Neighbourhood Plans allocating sites ahead of the Local Plan. The local support for this site is an important consideration for the Local Plan site assessment process.
- 1.4 Redbourn is a well serviced settlement with good levels of existing facilities and is clearly a sustainable location for growth.

  The report site is well located in relation to key services and facilities and is within walking distance of schools, shops, health

and leisure facilities. It lies adjacent to a bus stop and 5.4km from the railway station.

- 1.5 The site off Blackhorse Lane has built development to the west, south and east, with the recreation ground to the north. The site off Dunstable Road has built development to the north and south, with the recreation ground to the west. Given the pattern of existing development, the site will not extend the built envelope of Redbourn any closer to neighbouring settlements so will not cause coalescence in any form.
- 1.6 There are no constraints that would prevent development. The loss of playing field land will need to be addressed but the improvements in the quality of sports provision which could result from the proposals would outweigh the loss.
- 1.7 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.
- 1.8 The site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.



## 2.0 SITE & CONTEXT ANALYSIS

#### 2.1.0 Location

The first part of the Report Site is located on the northern side of Blackhorse Lane to the western side of Dunstable Road. Adjoining the site to the west is St Luke's School and to the east is Redbourn Recreation Centre.

- 2.1.1 The land comprises an irregular shaped parcel of land that is currently vacant and open. There is an existing mature hedgerow to the frontage with Blackhorse Lane whilst the rear boundary is open. The site extends back from Blackhorse Lane by some 65m.
- 2.1.2 Abutting the first part of the Report Site to the east is the Redbourn Recreation Centre building and extensive area of associated car parking. Between the centre and Blackhorse Lane are detached residential properties set in extensive grounds.
- 2.1.3 Abutting the first part of the Report Site to the west are the educational buildings and grounds of St Luke's School.
- 2.1.4 The second part of the Report Site is located on the western side of Dunstable Road and to the north of Blackhorse Lane. Adjoining the site to the south is the Redbourn Recreation Centre and to the north is Datalogic House.

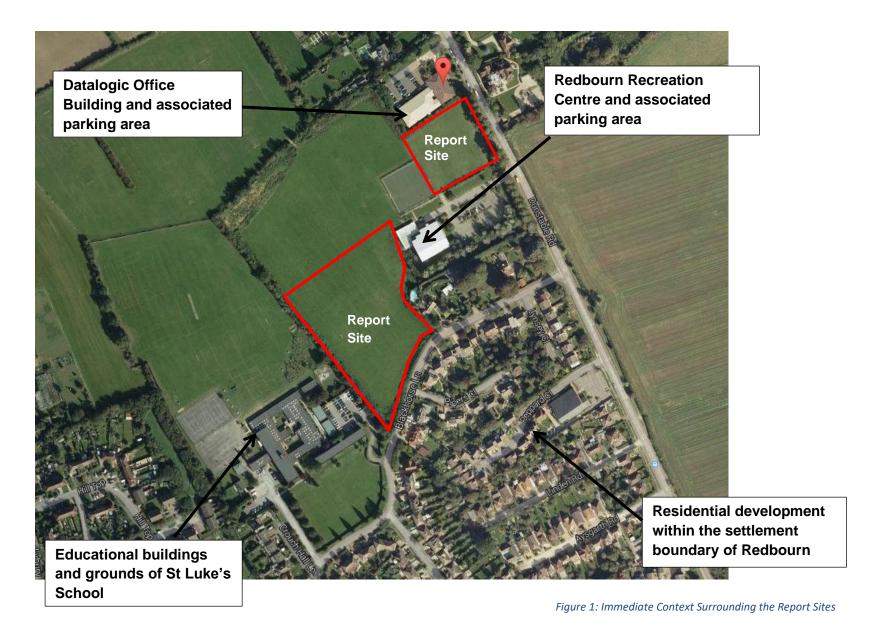
- 2.1.5 The second part of the Report Site comprises a square parcel of land that is currently vacant. It has a width of 75m narrowing to the rear and a depth of 71m. There is an existing mature tree screen to the frontage with Dunstable Road whilst the rear boundary is open.
- 2.1.6 Abutting the land to the south is the Redbourn Recreation Centre building and extensive area of associated car parking. The building is set back from the road by some 80m and consequently is set behind the rear boundary of the Report Site.
- 2.2.3 Abutting the second part of the Report Site to the north is the substantial office building of Datalogic and extensive area of associated car parking.

#### 2.2.0 **Context & Land Uses**

The Report Sites are both currently part of the playing fields around Redbourn Recreation Centre which the landowner allows the Redbourn Playing Fields Trust the use of free of charge.

2.2.1 The immediate locality around the site comprises the following elements as identified on the location plan opposite:







#### 2.4.0 Access

The proposed site layout shows that each of the parts of the Report Site would be accessed independently. The first part from Blackhorse Lane at two points and the second part from Dunstable Road via a single access.

#### 2.5.0 **Development Plan Notation**

The proposals map of the St Albans District Local Plan Review 1994 shows the Site within the Metropolitan Green Belt (MGB). The sites are not subject to any other designation or at risk from flooding.

#### 2.6.0 Local services

The Report Sites are well served by public transport and also benefits from good access to a range of local services and facilities. The site is within close proximity of the centre of Redbourn, which boasts a Co-operative food store, a dental practice, doctor's surgery, pharmacy and a range of other local facilities.

## 2.7.1 **Public Transport**

The nearest bus stop is located on Dunstable Road to the south of the Report Sites at the junction with Linden Road, and is served by bus nos. 34, 46, 647 and 657, which serve Flamstead, Dunstable and Luton in the north and St Albans and Hemel Hempstead in the south.

2.4.3 Harpenden Railway Station is 5.4km to the east of the Report Site providing frequent services to St Albans, St Pancras International, Gatwick Airport and Brighton to the south and Luton Airport, Luton and Bedford to the north.



#### 3.0 STRATEGIC CONTEXT

- 3.1 This Call for Sites opportunity marks the start of a new Local Plan process. With the withdrawal of the draft Local Plan in 2020 following the withdrawal of the Strategic Local Plan in 2017, the need for an up-to-date strategic framework for development is more urgent than ever.
- 3.2 The objectively assessed housing need for St Albans district is around 900 dwellings per year. This should be the starting point. However, the Council will also be aware of neighbouring authorities that are struggling to meet their own housing requirements. The Council will need to have open and constructive dialogue with these authorities if it is to satisfy the Duty to Cooperate. The potential for St Albans district to assist with meeting housing needs from surrounding areas should not be dismissed at this stage. There is considerable development potential within the district, partly stemming from the fact that Green Belt boundaries have not been properly reviewed for around 35 years. The Council should not see the 900 homes per year target as a ceiling if greater potential emerges through the Green Belt review or other evidence.

#### **Housing need**

- 3.3 The reliance on a Local Plan adopted in 1994 and the housing policies and land allocations therein has had a catastrophic effect on housing delivery within the district. With an annual housing target of around 900 homes per year and annual housing completions since 2001 running at 376 homes per year, a whole generation of young people have been largely unable to access the housing market. Recent performance can be judged by the latest Housing Delivery Test results for St Albans District (published in February 2021), which indicated a HDT measurement of only 63% for the period 2017/18 to 2019/20 the 33<sup>rd</sup> worst of the 298 local authorities in England.
- 3.4 While housing completions have, to a degree, been propped up by recent changes to permitted development rights, these have not had an impact on the delivery of affordable housing. The target of 200 affordable homes per year from the 1994 Local Plan has not been met. Since 1994, 1,826 affordable homes have been delivered, against a target of 5,200 only 34% of the target and a shortfall of 3,374 affordable homes. In 2019/20, only 31 affordable homes were completed just 7% of total completions.
- 3.5 The delivery of a new Local Plan with updated housing targets, new housing allocations and new Green Belt releases is of the utmost importance for the district.



## The portfolio of housing sites

- 3.6 To meet housing need will require the delivery of a mixed portfolio of housing sites. A range of sizes, types and locations will be needed to enable a wide range of housebuilding organisations to contribute to meeting needs, including arrangements for self-build properties.
- 3.7 The previous focus only on strategic sites of 500 dwellings or more must change. As highlighted by the Inspectors examining the now-withdrawn draft Local Plan, and as recognised by the Council's Planning Portfolio holder, small and medium-sized sites within the Green Belt must be seriously considered.

#### **Green Belt considerations**

3.8 The Council's Green Belt review from 2012 provides a useful starting point but is in no way adequate to support a new Local Plan. The focus on strategic sites must change and the Green Belt review must look at the site-specific impacts of proposed development sites. The broad-brush, coarse-grain approach to assessing parcels of Green Belt land in the 2012 Review must be developed into a more sophisticated and nuanced review of development potential. This will include both strategic and smaller-scale housing and employment sites.



## 4.0 **PLANNING HISTORY**

## 4.1.0 **Site**

The table below shows the relevant planning history for these sites.

LPA Reference	Proposal	Decision
5/1986/0018	Use of land for sports and recreation purposes. and erection of 7 detached bungalows.	Refused 24/4/86
5/1987/1379	Use of land for recreational purposes	Approved 5/11/1987
5/1988/0380	Erection of seven bungalows and double garages	Refused 26/5/88



## 5.0 PREVIOUS SHLAA ASSESSMENT

- 5.1.0 Both sites have been submitted through previous Call for Sites invitations and were assessed by the Council in the 2016 Strategic Housing Land Availability Assessment (SHLAA). At that stage the Council concluded in respect of the first part of the site, off Blackhorse Lane, that "development of this site (which comprises the southern part of existing playing fields lying to the south west of the Redbourn Recreation Centre) would result in infill within open countryside, would be visually intrusive from the surrounding countryside and would create additional development pressure on adjoining land. However, it is recommended that this site is shortlisted only so that it is looked at comprehensively with adjoining sites 138 and 266. Sport England would need to be satisfied that any loss of playing pitches would be reprovided to the same or better quality elsewhere and that the proposed development had wider benefits for the local community."
- 5.1.1 A consultation response was made to the 2016 SHLAA finding, commenting that the SHLAA repeats the findings of the Council's Green Belt Review in 2003, which stated that the site "clearly forms part of the built up area of Redbourn". The Review went on "Development of the site would undoubtedly have a visual impact on surrounding land, although this comprises playing fields, which have more of an urban fringe rather than rural

- character." It was also highlighted that the SHLAA itself raises concerns that seem to contradict the earlier findings, in that development "would result in infill within open countryside, would be visually intrusive from the surrounding countryside and would create additional development pressure on adjoining land". Nevertheless, the SHLAA concludes that the site is suitable for 45 dwellings. This conclusion was supported and continues to be so. The site was also included as a proposed site in the draft Neighbourhood Plan.
- 5.1.2 In respect of the second part of the site, off Dunstable Road, the Council rejected the site but gave no reasons as to why. A consultation response was made to the 2016 SHLAA finding, highlighting that the site was referred to in the conclusions in respect of the first part of the Report Site.
- 5.1.2 A new Green Belt boundary could be created along the edges of each site. New homes are needed within Redbourn and this site could be released without unduly affecting the wider purposes of the Green Belt, as set out in Section 8 below.
- 5.1.3 The Report Sites were previously supported by the Redbourn Neighbourhood Plan as a comprehensive proposal along with improvements to the sporting facilities at the recreation centre. The only reason the sites have not come forward is due the progress of the Neighbourhood Plan being hindered by the Local



Plan process and it being unable to remove the sites from the Green Belt.



## 6.0 **SITE CONSTRAINTS**

6.1.0 The Council's Call for Sites 2021 pro forma seeks information on any constraints affecting potential sites. While the constraints applying to this site are discussed throughout this report, the information is summarised here in the same format as requested on the pro forma, for ease of reference.

#### 6.2.0 **Contamination/Pollution**

No suspected issues of contamination or pollution that would preclude development.

#### 6.3.0 Environmental issues

No significant environmental constraints other than the site is located within the Green Belt.

#### 6.4.0 Flood risk

The site is located within Flood Zone 1 and therefore is at very low risk of flooding.

## 6.5.0 **Topography**

The site is essentially level such that large amounts of spoil would not need to be removed.

#### 6.6.0 **Utility services**

It is likely that utilities are available in Dunstable Road and Blackhorse Lane to which a connection could easily be made.

#### 6.7.0 **Legal issues**

The sites are in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present.

#### 6.8.0 **Access**

The proposed site layouts show that the first part of the site would be accessed via two points from Blackhorse Lane and the second from a single access off Dunstable Road.

#### 6.9.0 Other constraints

The sites currently form part of the playing fields around the recreation centre and are therefore protected for that use, a planning application would have to demonstrate that the proposals met one of the exceptions Sport England's Playing Fields Policy and Guidance. It is considered that the intended provision of improved sports facilities, either indoor, outdoor or both would be sufficient to meet the tests of Sport England's exception 5 where the proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.



## 7.0 **OUTLINE OF PROPOSAL**

- 7.1 These representations are made behalf of Jarvis Homes Ltd in respect of the site north of Blackhorse Lane and land at Dunstable Road in Redbourn.
- An indicative layout has been produced showing how the site off Blackhorse Lane could accommodate 14 detached and semi-detached dwellings, comprising a mix of units. The proposed dwellings would follow a linear arrangement, replicating existing dwellings to the south of Blackhorse Lane. A well-established hedgerow to the front of the proposed dwellings would be retained in order to partially screen the development. There would be two openings along the existing hedgerow to serve as separate access points for the proposed dwellings. The remaining area of land would be donated to the Redbourn Recreation Centre.
- 7.3 An indicative layout has been produced showing how the site at Dunstable Road could accommodate 12 dwellings of varied sizes. The dwellings would be in sets of threes and would follow a linear arrangement in respect of the surrounding character. The mature tree line along the frontage would be retained to enhance screening. There would be a single opening along the existing tree line to serve as an access for the proposed dwellings.



7.4 On 21<sup>st</sup> November 2013, St Albans City and District Council's Cabinet approved the designation of the Neighbourhood Plan Area for Redbourn. Redbourn Parish Council held a consultation on both parts of this report site, as part of a larger location of



potential sites and have produced a site assessment. It recognised that the sites have good potential for development:

#### Land off Blackhorse Lane

"The site has good potential for development, having no significant constraints. It is reasonably located on the northern edge of Redbourn and within walking distance of the High Street and a bus stop. The potential to protect the existing playing field land adjacent to the Recreation Centre in order to offer improved space for outdoor sport/leisure represents a strong community benefit. However, there would be some loss of green space for leisure compared to the existing position."

#### Land at Dunstable Road

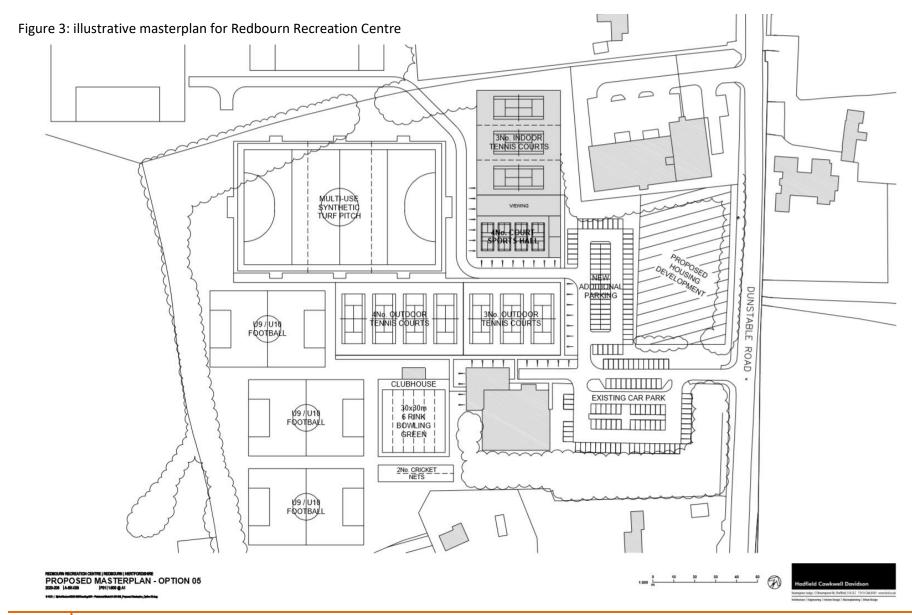
"It would be logical to develop this site together with Land north of Blackhorse Lane which would, in combination, make a significant contribution to addressing a range of housing needs".

7.5 As the sites currently form part of the playing fields around Redbourn Recreation Centre they are protected from development unless one of the five exceptions set out in the Sport England Playing Fields Policy and Guidance are met. The land is currently used by the Redbourn Playing Fields Trust for free and as part of the overall development proposals the developer intends to provide funding to improve facilities at the Recreation Centre as well as compensating for the loss of the areas of playing field. The remaining playing field areas owned

by the developer would be donated to Redbourn Recreation Centre.

- One of the exceptions which would allow Sport England to support the development of the sites would be that "The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field." It is understood that the Redbourn Playing Fields Trust has undertaken an assessment of the use of the existing facilities and has a number of identified improvements it wishes to make. One of the improvements is to provide a full-size, floodlit artificial pitch. The illustrative masterplan for the site is shown below at Figure Such provision would more than compensate for the land lost for the housing development given the increased hours of use an artificial, floodlit pitch can sustain.
- 7.7 The site was proposed to be allocated in the Pre-Submission Neighbourhood Plan (January 2018) under Policy RED8. However, as explained above, these allocations cannot be delivered until there is a change to the Local Plan, either to allocate the sites directly or to enable the Neighbourhood Plan to do so.
- 7.8 Whichever approach is taken, a change to the Local Plan is urgently needed.







#### 8.0 **GREEN BELT IMPACT**

- 8.1.0 Paragraph 134 of the NPPF states that the Green Belt serves five purposes. These five purposes have been set out below with an assessment on the site's contributions to each purpose.
- 8.2.0 Purpose 1 to check the unrestricted sprawl of large built-up areas.

Whilst the site would extend the built-up area of Redbourn, it is not considered that this would be 'unrestricted sprawl'. The incorporation of the entire Report Site into the Redbourn Settlement boundary would essentially reflect the extent of the northern spread of built development and would be defined by the open space around the recreation centre.

8.3.0 Purpose 2 – to prevent neighbouring towns merging into one another.

The nearest town to the east of Redbourn would be Harpenden. The southern part of Redbourn already extends to the A5183 which is much closer to Harpenden than the Report Sites. The proposed development would extend built development slightly to the north. The nearest town to the north of Redbourn would be Luton, some 5.3km away. Development of these sites would not cause coalescence between towns. The sites are considered to make no contribution to this purpose.

8.4.0 Purpose 3 – to assist in safeguarding the countryside from encroachment.

The sites are contained with the recreation centre plot which extends beyond the Report Sites towards the countryside. In essence, they do not have sense of separation from the settlement of Redbourn and is largely suburban in character such that there is a very limited contribution to this purpose.

8.5.0 Purpose 4 – to preserve the setting and special character of historic towns.

The land does not form part of the setting of Redbourn or contribute to its special character. This should be limited or no contribution.

8.6.0 Purpose 5 – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is a common assumption that all Green Belt land within the District makes a significant contribution to this purpose.

8.7.0 **Summary of harm to Green Belt** 

Paragraph 133 of the NPPF stipulates that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are



their openness and their permanence". Thus, whilst openness is an essential characteristic, in assessing its importance this cannot be divorced from the overriding aim of preventing urban sprawl. This notion is supported by paragraph 139 of the Framework, with regard to Green Belt boundaries. This states that when defining boundaries, local planning authorities should, inter alia, "not include land which it is unnecessary to keep permanently open". As such, it is considered that the harm would be very limited for the following reasons:

- The site includes would involve the incorporation of what is now, a suburban, residential frontage given the existing housing and the recreation centre buildings and land which makes little contribution to the openness of the Green Belt.
- The land off Blackhorse Lane is enclosed to the east by housing and to the west by St Luke's School. To the south is Blackhorse Lane with residential development beyond. The Dunstable Road site is similarly enclosed on three sides by existing development. Given the surrounding development and the size of the sites it is not considered that they make any valuable contribution to the Green Belt.
- 8.7.1 In light of the above, there is limited value in retaining any part of the Report Site as designated Green Belt.

## 8.8.0 New position of Green Belt boundary

An alternative Green Belt boundary has been illustrated below in Figure 3 below. This would run along the rear of the proposed housing development on Blackhorse Lane, and then follow the line of the existing recreation centre buildings and the area proposed for expansion of the recreation centre. The proposed boundary would also exclude the Datalogic building a large, two-storey office building that does not need to remain in the Green Belt.



Figure 2: Existing & Proposed Green Belt Boundaries



## 9.0 **CONCLUSIONS**

16

- 9.1 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 9.2 The two proposed housing elements of the report site have previously been supported in the emerging Neighbourhood Plan for Redbourn and were only removed because of procedural issues about Neighbourhood Plans allocating sites ahead of the Local Plan. The local support for this site is an important consideration for the Local Plan site assessment process.
- 9.3 Redbourn is a well serviced settlement with good levels of existing facilities and is clearly a sustainable location for growth. The report site is well located in relation to key services and facilities and is within walking distance of schools, shops, health and leisure facilities. It lies adjacent to a bus stop and 5.4km from the railway station.
- 9.4 The site off Blackhorse Lane has built development to the west, south and east, with the recreation ground to the north. The site

- off Dunstable Road has built development to the north and south, with the recreation ground to the west. Given the pattern of existing development, the site will not extend the built envelope of Redbourn any closer to neighbouring settlements so will not cause coalescence in any form.
- 9.5 There are no constraints that would prevent development. The loss of playing field land will need to be addressed but it is considered that the improvements in the quality of sports provision which could result from the proposals would outweigh the loss.
- 9.6 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.
- 9.7 The site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.





# VISION DOCUMENT

LAND AT GADDESDEN LANE REDBOURN DECEMBER 2020

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#### **VISION STATEMENT**

