

Design and Access Statement

Land north of Chiswell Green Lane and west of The Croft, Chiswell Green

ADDISON PARK

local homes for local heroes



Up to 330 Discounted Affordable Homes for Key Workers

Design and Access Statement

Land north of Chiswell Green Lane and west of The Croft, Chiswell Green

Outline Planning Application with Access Sought

The demolition of existing buildings, the building of up to 330 discounted affordable homes for Key Workers, including military personnel, the creation of open space and the construction of new accesses.

On behalf of Mr Steve Collins of Headlands Way Ltd

Ref: SC/AP/das

Brian Parker
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Personal Statement

The information and evidence in this Design and Access Statement have been prepared and are given in accordance with the guidance of the RTPI and I confirm that the views expressed are my professional opinions.

Brian Parker
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1 Summary

1.1 This Design and Access Statement is for a unique residential development proposed for land north of Chiswell Green Lane and west of The Croft in Chiswell Green, St Albans. It should be read in conjunction with:

- Site Location Plan (Rev. C); Existing Site Plan; and Indicative Proposed Site Layout (Rev. B) © Tom Gristwood
- Topographical Survey © Tower Surveys
- Geoenvironmental Preliminary Risk Assessment © Structural Soils
- Ecology Appraisal © Cherryfield Ecology
- Arboricultural Report and Tree Protection Plan © David Clarke
- Flood Risk Assessment and Sustainable Drainage Assessment © GeoSmart Information
- Noise Assessment © Spectrum Acoustic Consultants
- Air Quality Assessment © Hawkins Environmental
- Agricultural Land Classification © RSK ADAS Ltd
- Utilities Assessment © Mewies Engineering Consultants Ltd
- Transport Assessment © Milestone Transport Planning: including:
Proposed Access Arrangements Ref: 21086 001 Rev B;
Proposed Foot/Cycleway Enhancements (2 sheets) Ref: 22086 002
Swept Path Analysis (Refuse Vehicles) Ref 21086 TK01 Rev A
Swept Path Analysis (Fire Tender) Ref 21086 TK02 Rev A
- Travel Plan © Milestone Transport Planning
- EIA Screening Decision Ref: 5/2021/2520
and
- Planning Statement; Affordable Housing Needs Assessment; Statement of Community Involvement; Local Requirements Checklist; Site Photos; and Draft S106 Heads of Terms © McPartland Planning Limited.

1.2 The Proposal is to build up to 330 Affordable Homes for Key Workers discounted by a third, and to create extensive open space on largely open land on the western edge of Chiswell Green. This will require a number of existing buildings to be demolished and a new vehicular access to be created from Chiswell Green Lane. An existing gated access from The Croft onto a paddock will be retained and extended to provide an alternative access to and from the Site for emergency vehicles only.



1.3 The Statement: explains the Design Rationale; assesses the Site and relevant Design Policy contexts; and considers the outline scheme against the Council's most relevant design policy and guidance.

1.4 It concludes that the Site is suitable to accommodate the proposed scheme, the design and layout of which can be seen to be in accordance with the relevant policies of the 1994 Local Plan.

2 Design Rationale

- 2.1 Addison Park is a radically-different response to the affordable housing crisis in St Albans. It treats affordable housing as a top priority and an essential asset if we're to accommodate some of the most valuable members of our local communities: Key Workers. In that respect, it's far more special than other schemes which have been approved in St Albans recently, where the majority of the houses are unaffordable to most and none have been set aside for Key Workers.
- 2.2 The design rationale is simple: to deliver high-quality housing for local heroes in an extensively-landscaped environment with a commitment to increased biodiversity, green technology and zero-net carbon.
- 2.3 In pre-application discussions, a consultee highlighted one of the key features of the scheme, it's attractive low density. That's because at Addison Park, the Home Ownership affordable housing will be as spacious and attractive as the open market housing being built on other sites in the District. Affordable housing shouldn't be regarded as a second-class citizen and won't be at Addison Park. So, whilst the Indicative Proposed Site Layout is just that, indicative, it represents a clear statement of design intent: high-quality housing that valued Key Workers will be happy to call home.

The affordable housing at Addison Park
will be as spacious and attractive
as open market housing on other sites

3 The Site – constraints and opportunities

Description, Location and Context

3.1 The Application Site is located on the western side of Chiswell Green. It currently has limited vehicular access at two points along Chiswell Green Lane: please see the Site Location Plan.

3.2 The Site is approximately 14.2 hectares. From east to west, it comprises:

- a small paddock with stables and limited vehicular access off Chiswell Green Lane; and
- a rarely used polo field within a larger area of grazing which has a large agricultural barn and its own access, off Chiswell Green Lane.

3.3 The Site is bordered to the south and east by public roads, Chiswell Green Lane and The Croft, respectively, and to the north and west by public footpaths. The majority of the Site is screened by trees and/or hedgerows. The entire Site is within the Green Belt.

Sustainable Location

3.4 The Site is c. 3.5 kilometres south of the centre of the St Albans, an attractive and thriving Cathedral City, which lies to the north of the M25 and between the M1 and A1(M). The Site is c. 2.1 kilometres north of Junction 21a of the M25 and, via the A414, enjoys easy access to the M1 at Hemel Hempstead and A1(M) at Hatfield. St Albans City Station has a direct train service: south to the centre of London (20 minutes) and on to London Gatwick Airport and Brighton; and north to London Luton Airport and Bedford. A second station, St Albans Abbey, provides a shuttle service between St Albans and Watford, stopping at Park Street station, c.2.5km east of the Site

3.5 Chiswell Green is a large village identified as a Specified Settlement (Ref: SS.2) in Policy 2 of the 1994 Local Plan. The village possesses a wide range of facilities as can be seen in Fig. 1 opposite:

3.6 The close proximity of local amenities and the level of public transport provision to health, educational, retail, leisure and other facilities, means the Site is an appropriate and sustainable location for a new residential development.

Constraints and Opportunities

3.7 **Nearby Residential Development.** The northern half of the eastern edge of the Site is separated from housing on Cherry Hill by undeveloped land owned by a third party. The southern half of the eastern edge is owned by the applicant and abuts directly with The Croft. This area is currently paddocks and has two vehicular accesses: one off The Croft and one from Chiswell Green Lane. A small number of dwellings are opposite the southern boundary of the Site and are accessed from Chiswell Green Lane.

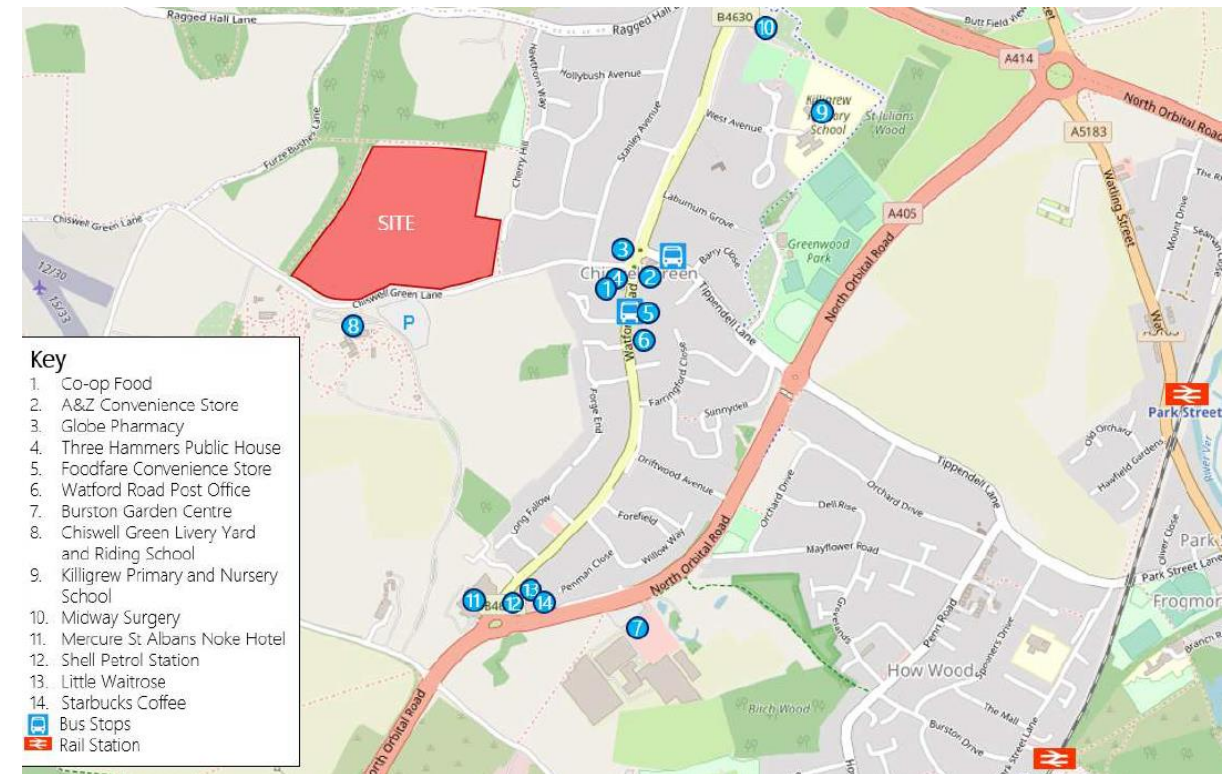


Fig. 1 map of local amenities © Milestone Transport Planning, 2021

- 3.8 The scheme seeks to maintain a degree of separation between existing houses on Cherry Hill and The Croft by locating the new houses at least 75 metres away. The existing vehicular access off The Croft will be used to create a gated-access to the Site for use by emergency vehicles only.
- 3.9 The scheme will also maintain a degree of separation between neighbouring properties on Chiswell Green Lane by retaining the existing screening on the southern boundary and by creating new open space, with the Applicant's preference for the majority of it to be a Memorial Park.
- 3.10 **Topography.** The majority of the Site is quite level. The Topographic Survey by Tower Surveys (June 2021) records the general ground levels between 97.67 and 105.36mAOD, with the land falling gradually in a south-westerly direction. The topography is considered to create no constraints to the building of residential dwellings.
- 3.11 **Biodiversity.** The Landscape Visual Impact Assessment (UBU Design, 2021) considers that "... *apart from its retained boundaries (the Site) is currently bereft of any vegetation or ecology diversity*" (paragraph 7.5).
- 3.12 The Ecology Appraisal (Cherryfield Ecology, 2021) found no evidence of bats, badgers, amphibians, reptiles or other protected species on the Site and considered the likelihood of their presence to be negligible. No breeding birds were found at the time of the survey but their presence on the hedgerows (which are to be retained) was considered to be moderate.
- 3.13 Biodiversity Net Gain – Given the paucity of ecology at the Site and the opportunity to significantly increase biodiversity through extensive tree planting, open spaces and the landscaping of hundreds of residential gardens, it is our intention to deliver a Biodiversity Net Gain significantly higher than 10%, the details of which will be confirmed at the Reserved Matters Stage and secured through a s106 Agreement. I note some, including Herts & Middlesex Wildlife Trust, have insisted that the Defra Matrix should be applied for every application but, with respect, that approach is inappropriate for large Outline applications. This is because Landscaping and Layout are Reserved Matters and so the data would, inevitably, be incomplete and the calculations imprecise.
- 3.14 The most appropriate approach was confirmed by St Albans Council in its Report to the Planning Referrals Committee, July 2021, in respect of an Outline Application off Harpenden Road (Ref: 5/2021/0423), when the Officers wrote:
- "The concerns in relation to this approach from HMWT and others are noted. However, there is recent precedent for this approach in the recently allowed appeal at Bullens Green Lane and it was an approach accepted by the Council during that appeal. This is because the most appropriate time to assess biodiversity loss and gain, and to determine the most appropriate compensation, is when the full details of the proposed development are known."*
- 3.15 **Drainage.** There are no surface water features on the Site. The Flood Risk Assessment and separate Sustainable Drainage Assessment (both GeoSmart, 2021) consider the risk of flooding won't increase significantly and proposes appropriate mitigation measures.
- 3.16 **Vehicular and Pedestrian Access.** All land required by the proposal is in the ownership of either the Applicant or Hertfordshire County Council as the highways authority. For more details of access arrangements please see the Transport Assessment (Milestone Transport Planning, 2021).

4 Design Policy Context

4.1 The Planning Policy Context, which is critical to the consideration of this Application, is covered in detail in the Planning Statement included with the application documents. This Section considers how relevant local and national Design Policies have influenced the scheme.

1994 Local Plan and SPG

4.2 Policy 70 of the 1994 Local Plan sets out the requirements for the “Design and Layout of New Housing”. Supplementary Planning Guidance¹ in the form of the Council’s Design Advice Leaflet No. 1 was published in 1998 to add detail to Policy 70. With respect, and to borrow a phrase used by an Inspector in a recent Appeal Decision², both the Policy and the SPG are “*painfully out-of-date*”, being pre-CABE, pre-NPPF, pre-Technical Housing Standards etc.

4.3 Nevertheless, Policy 70 is the current development plan policy and so will be the key driver of the scheme’s design, as set out in more detail in Section 5 below. Consequently, this scheme will seek to accord with the policies in the extant development plan, unless material considerations support an alternative approach.

4.4 Whilst neither Policy 7A “Affordable Housing in the Towns and Specified Settlements” or Policy 8 “Affordable Housing in the Green Belt” apply to this Site, I note that criterion 4 of Policy 70 requires compliance with Policy 40 “Residential Development Parking Standards”. This has been updated by the Council’s 2002 Parking Policies and Standards. For Zone 1, this states that “*applicants will be encouraged to meet existing standards, but schemes slightly below the standards may be accepted*”. The 2002 SPG also requires a cycle space per unit if no garage or shed is provided.

Emerging Local Plan

4.5 Initial consultation on a new Local Plan 2020-38, finished on 8th March 2021. There are, as yet, no draft design policies to consider.

The St Stephen’s Neighbourhood Plan (“The SSNP”)

4.6 Until it’s “made”, the SSNP isn’t part of the development plan. However, as set out in the next Section, the scheme can be seen to be in general accordance with the relevant elements of Draft Policy S3 Character of Development and Draft Policy S5 Design of Development.

The NPPF

4.7 The current NPPF was published in July 2021, replacing previous versions which themselves replaced the previous range of Guidance Notes, and Policy Statements. Paragraph 2 of the NPPF states, amongst other things, that the Framework “*... is a material consideration in planning decisions*”.

4.8 Whilst most of sections of the NPPF are relevant to this Application, I consider that the more important ones for this Design and Access Statement are:

- “*Achieving sustainable development*”, Section 2;
- “*Promoting sustainable transport*”, Section 9;
- “*Making effective use of land*”, Section 11; and
- “*Achieving well-designed places*”, Section 12.

4.9 Amongst other changes introduced into the current NPPF in July 2021, were measures to improve design quality. This requires LPAs to “*prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences*”. Until the Council has the opportunity to prepare such guides or codes, the scheme will be considered against Policy 70 from 1994 and the 1998 SPG.

Planning Practice Guidance (“the PPG”)

4.10 The PPG was published on 6th March 2014 (with updates since) and replaced all previous planning guidance documents. The PPG confirms that “*design quality cannot be achieved through an outline planning application alone. Outline planning applications allow fewer details about the proposal to be submitted than a full planning application, but can include design principles where these are fundamental to decision making*” (Ref: Paragraph: 010 Reference ID: 26-010-20191001 Revision date: 01 10 2019).

¹ SPGs were replaced by SPDs (Supplementary Planning Documents) in 2004

² Appeal Ref: APP/C1570/W/19/3242550 paragraph 16, September 2020

5 Design and Layout

Use and Amount

- 5.1 Outline permission is sought for the removal of existing buildings and the construction of up to 330 dwellings and the creation of extensive open space and new accesses. A notional schedule of 330 dwellings is shown in the Indicative Proposed Site Layout. This indicates that there will be 32 no. 1-bedroom units; 116 no. 2-bedroom units and 182 no. 3-bedroom units. All new dwellings will be affordable homes as defined by the NPPF. Uniquely, they will also be discounted by a third to make them even more affordable. The quantum of housing and the house-size mix are subject to change for the Reserved Matters Stage if new evidence and discussions with the Council and others indicate a more appropriate scheme.
- 5.2 The Indicative Proposed Site Layout shows that a large part of the open space can be dedicated to the creation of a Memorial Park: envisaged as a more peaceful complement to the memorial in the busy centre of St Albans – offering people an opportunity to reflect and remember in more sedate surroundings. If the Outline scheme is approved, the inclusion, design and maintenance of the Memorial Park is expected to be subject to discussions between St Stephens Parish Council, St Albans Council and representatives of the Tri-Services. It may be that some of the area currently identified for the Memorial Park is allocated as a community sports facility such as a bowling green.
- 5.3 Whilst the sustainable location of Addison Park makes it accessible by public transport and foot, it's reasonable to conclude that the open space/Memorial Park/bowling green will be visited by people with mobility issues such as injured/elderly veterans and by, for instance, school groups. Consequently, the Indicative Proposed Site Layout includes a gated car park, which will be landscaped. It is anticipated that this will be opened on key dates and by prior arrangement. I consider the car park to be fully-compliant with Policy 91 ii c of the 1994 Local Plan.
- 5.4 The extensive open spaces significantly exceed the amount required by Policy 70 xi. The Indicative Proposed Site Layout currently includes a children's play area even though one exists immediately north east of the Site. The proposed play area can be retained at the Reserved Matters Stage (and perhaps targeted at a different age group) or, subject to discussions with the Council, a S106 contribution could be agreed to extend and/or upgrade the existing play area.
- 5.5 The Indicative Proposed Site Layout has been influenced by the unique characteristics of the Site and the particular circumstances of its surroundings. The context and needs of the both the District and the immediate local area have been taken into account and will help shape the final scheme at the Reserved Matter stage.

Layout – A Reserved Matter

- 5.6 The Indicative Proposed Site Layout has been shaped to reflect: the indicative quantum and housing mix; the requirements of Policy 70 of the 1994 Local Plan; and the relevant elements of the emerging Neighbourhood Plan.

Scale and Appearance – Reserved Matters

- 5.7 A mix of detached, semi-detached and terraced dwellings and small apartment blocks is envisaged. The intention is for the dwellings to be two or two-and-a-half storey.

Landscaping – A Reserved Matter

- 5.8 The intention is to increase significantly the substantial tree-planting programme the Applicant has already pursued in recent years (please see the Tree Protection Plan (DCCLA, Oct 2021) for details of the native species planted recently including ash, oak, cherry, hornbeam, hawthorn and field maple). In addition to the new landscaped open spaces, the scheme will also include tree-lined roads as sought by the Government.
- 5.9 A small number of trees will be removed to create suitable access and for the new parallel parking on Chiswell Green Lane to the east of the Site. The Arboricultural Report identifies the trees to be removed as “low quality or unremarkable ‘C’ category trees as set out in BS 5837:2012” (DCCLA, Oct 2021, paragraphs 6.9 and 15.3).

Access

- 5.10 Given that a new Primary Vehicular Access is to be created off Chiswell Green Lane, it was considered essential to liaise with Hertfordshire County Council (the highways authority) to ensure this would be safe and suitable and to establish what HCC would require within a subsequent Transport Assessment.
- 5.11 The Transport Assessment (Milestone Transport Planning, November 2021), confirms the meeting with and outcomes from pre-application discussions with HCC (paragraphs 1.7-1.8). It identifies the current situation and likely scenarios and provides detailed mitigation measures. The Assessment concludes: “In the context of the guidelines within paragraph 111 of the NPPF (July 2021) it is considered that there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding transport network and therefore planning permission should not be withheld on transport planning and highway grounds.” (paragraph 9.3)
- 5.12 New Footpath – during the community consultation in September 2021, both the Ramblers Society and St Albans District Footpath Society, bemoaned the narrowness of Chiswell Green Lane and its unsuitability for pedestrians. They each sought the provision within the Site of a new footpath parallel to the road, with the Ramblers Society advising that the provision of such a path is included

in the County Council's Rights of Way Improvement Plan (Ref: 6/281)³. Consequently, the Indicative Proposed Site Layout was changed to provide this path, which will link up Footpath 21 on the western boundary of the Site to Footpath 82 on its south-eastern boundary.

- 5.13 Pedestrian and Cycling Access – The Indicative Proposed Site Layout also shows new links to the existing PROW network at all four corners of the Site. Enhancements to Chiswell Green Lane and the junction with Watford Road and Tippendell Lane will also improve opportunities for pedestrians and cyclists.
- 5.14 Travel Plan – Please see the attached Residential Travel Plan (Milestone Transport Planning, November 2021).
- 5.15 Please note, the land which is required for the road widening, speed-reducing measures and new formal parking spaces is within the ownership of HCC and, consequently, Certificate B has been signed and a Notice 1 issued.
- 5.16 Inclusive Access – as noted above, a small car park has been included within the scheme to ensure that as many people as possible, including those with mobility and/or travel issues, can enjoy the open space/Memorial Park.

Compliance with Relevant Policies

- 5.17 Before assessing the Outline Proposal against Policy 70 of the 1994 Local Plan and the relevant elements of the emerging Neighbourhood Plan, it must first be noted that a scheme can comply with the Development Plan even if it doesn't accord with every element of every policy. I refer the Council to the words of Sullivan, J. in *R v Rochdale Metropolitan Borough Council ex parte Milne (Queens Bench Division)*, July 2000 when he concluded:

"49. ... I regard as untenable the proposition that if there is a breach of any one policy in a development plan a proposed development cannot be said to be "in accordance with the plan". Given the numerous conflicting interests that development plans seek to reconcile: the needs for more housing, more employment, more leisure and recreational facilities, for improved transport facilities, the protection of listed buildings and attractive land escapes etc., it would be difficult to find any project of any significance that was wholly in accord with every relevant policy in the development plan. Numerous applications would have to be referred to the Secretary of State as departures from the development plan because one or a few minor policies were infringed, even though the proposal was in accordance with the overall thrust of development plan policies.

50. For the purposes of section 54A it is enough that the proposal accords with the development plan considered as a whole. It does not have to accord with each and every policy therein."

- 5.18 To best consider the degree to which this scheme accords with the most relevant policies, I shall assess it against the 12 criteria in Policy 70 Design and Layout of New Housing and also acknowledge, where relevant, elements of the emerging Neighbourhood Plan.
- 5.19 **(i) Design and Layout.** The Indicative Layout (whilst a Reserved Matter) clearly shows that the massing and siting of buildings can create a safe, attractive space of human scale.
- 5.20 **(ii) Dwelling mix.** The discounted affordable housing caters for just a small part of the urgent need of Key Workers. The mix of 1, 2 and 3-bedroom dwellings is indicative and may change, subject to discussion, at the Reserved Matters Stage.
- 5.21 I note that Criterion 1 of Draft Policy S2 of the Neighbourhood Plan states that *"support will be given to developments that provide predominantly 1-, 2- and 3-bedroom properties"*.
- 5.22 **(iii) Roads and footpaths.** The Transport Assessment demonstrates that all relevant criteria in Policy 34 Highways Considerations in Development Control have been satisfied.
- 5.23 I also consider that the access strategy accords with Criterion 1 (iv) of Draft Policy S5 of the Neighbourhood Plan.
- 5.24 **(iv) Parking and garaging.** Policy 40 Parking Standards in Residential Development has effectively been made out-of-date by the Council's 2002 Revised Parking Policy and Standards and by the emphasis on more sustainable forms of travel. I note that Criterion of 1 ii of Draft Policy S5 of the Neighbourhood Plan defers to the 2002 Standards.
- 5.25 The indicative provision of off-road car parking spaces for each discounted affordable home is appropriate and reasonable.
- 5.26 In addition, I believe it's clear, given the intention to exceed the amount of private amenity space required, that there is sufficient room for dedicated cycling spaces for each dwelling.
- 5.27 **(v) Landscape.** Whilst landscaping is a Reserved Matter, it's clear that the scheme can satisfy the requirements of Policy 74 Landscaping and Tree Preservation. Whilst a small number of trees will be removed in order to create the primary vehicular access and parallel parking spaces on Chiswell

Green Lane, all other trees and hedgerows will be retained. In addition, dozens of trees of native species will be planted throughout the Site.

- 5.28 The Landscaping scheme will also accord with Criterion 1 (iii) of Draft Policy S5 of the Neighbourhood Plan.
- 5.29 **(vi) Privacy between dwellings.** Whilst the most-recently Withdrawn emerging Local Plan sought to reduce the acceptable distances between dwellings to 22 metres (Policy L24 Development Amenity Standards), the Indicative Proposed Site Layout demonstrates that the 27m window-to-window distance sought in the 1994 Local Plan can be achieved.
- 5.30 **(vii) Privacy between dwelling and rear boundary.** Equally, the Indicative Proposed Site Layout demonstrates that the 13.5 distance sought by this Criterion can be achieved, too.
- 5.31 **(viii) Orientation.** There is no reason to suggest that suitable levels of sunlight and daylight can't be achieved at the Site. The potential of shadowing of homes or gardens will be taken into account when specific tree planting proposals are submitted at the Reserved Matters stage.
- 5.32 **(ix) Amenity space around dwellings.** The Indicative Proposed Site Layout demonstrates that the amenity space sought by this Criterion, and set out in the Design Advice Leaflet No. 1 SPG, can be achieved for all dwellings.
- 5.33 **(x) Defensible space.** The Indicative Proposed Site Layout demonstrates that all dwellings can be 3 metres from public land.
- 5.34 **(xi) Open space.** For a scheme of 330 dwellings, the formula in this Criterion requires a contribution of 0.99 hectares of open space, including a Children's Play Area. At Addison Park double that amount of Open Space will be provided.
- 5.35 **(xii) Materials.** At the Reserved Matters stage, materials will be demonstrated to be durable and compatible with the location.

Conclusion on relevant policies

- 5.36 The Outline scheme is clearly in general accordance with the most important policies in the Local Plan and relevant elements of the emerging Neighbourhood Plan.

6 Conclusion

- 6.1 This Design and Access Statement is for a unique new residential development at land north of Chiswell Green Lane and west of The Croft in Chiswell Green, St Albans. The proposal is to create new open spaces and to build up to 330 discounted Affordable Homes on largely open land. This will require a number of buildings to be demolished and a new vehicular access to be created from Chiswell Green Lane. An existing access from The Croft onto a paddock will be extended for use by emergency vehicles only. A new footpath will be established along the southern boundary of the Site whilst enhancements to Chiswell Green Lane and the junction with Watford Road/Tippendell Lane will also help to improve opportunities for pedestrians and cyclists.
- 6.2 This Statement has assessed the Site and relevant Design Policy context and evaluated the outline scheme against the Council's most relevant design policy and guidance.
- 6.3 The conclusion is that the Site is suitable to accommodate the proposal, which can be seen to be in accordance with the most relevant policies in the 1994 Local Plan and the emerging Neighbourhood Plan.

Brian Parker
BA MSc MRTPI
November 2021

ADDISON PARK

local homes for local heroes