



Land south of Chiswell Green Lane, Chiswell Green, St Albans

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

SECTION 78 APPEAL REF: APP/B1930/W/22/3313110

Appellant's NPPF & HDT Position Statement

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**On behalf of
Alban Developments Limited and Alban Peter Pearson, CALA
Homes (Chiltern) Ltd and Redington Capital Ltd**

31st January 2024

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

SECTION 78 APPEAL REF: APP/B1930/W/22/3313110

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND)

RULES 2000

APPEAL AGAINST THE REFUSAL OF PLANNING APPLICATION BY ST ALBANS CITY
AND DISTRICT COUNCIL - PLANNING APPLICATION REFERENCE: 5/2022/0927

LAND SOUTH OF CHISWELL GREEN LAND, CHISWELL GREEN, ST ALBANS

APPELLANT'S NPPF & HDT POSITION STATEMENT

JUSTIN MATTHEW KENWORTHY

Project Ref:	333100809/A5/JK
Status:	Final
Issue/Rev:	
Date:	31 st January 2024
Prepared by:	Justin Kenworthy (Stantec)
Checked by:	JK & James Delafield (CJ)
Authorised by:	JK

CONTENTS

1.0	INTRODUCTION.....	4
2.0	APPELLANT'S RESPONSE TO 2023 NPPF.....	5
3.0	CONCLUSION.....	16

1.0 INTRODUCTION

1.1 I have prepared this NPPF+HDT Position Statement in relation to an appeal (reference: APP/B1930/W/22/3313110) submitted by the Appellants¹ in respect of the appeal lodged under Section 78 of the Town and Country Planning Act 1990 (as amended) ('the 1990 Act') against St Albans City and District Council's ('the Council') refusal of outline planning application reference 5/2022/0927.

Scope of this Statement

1.2 This Statement provides my response to Department for Levelling Up, Homes and Communities' (DLUHC) letter, dated 18th January 2024, which invites the Appellant to confirm if the contents of the following publications affect the case put forward to the Inspector at the Public Inquiry:

- The revised National Planning Policy Framework published on 20th December 2023 [hereafter referred to as the "2023 NPPF"]; and
- The 2022 Housing Delivery Test figures published on 19th December 2023 [hereafter referred to as the "2023 HDT figures"].

1.3 This Statement sits alongside the evidence I have already submitted to the Planning Inspectorate (PINS), which sets out my main planning evidence at the Public Inquiry held between 17th April and 9th May 2023, and comprises:

- Proof of Evidence (POE) (**CD 3.18a**);
- POE Appendices (**CD 3.18b**);
- Summary POE (**CD 3.18c**); and
- Rebuttal POE (**CD 3.24**).

1.4 This Statement replaces the Appellant's position statement on the draft version of the NPPF, published in December 2022, set out in Appendix JK6 of my POE.

¹ Alban Developments Limited and Alban Peter Pearson, CALA Homes (Chiltern) Ltd and Redington Capital Ltd ("the Appellants")

2.0 APPELLANT'S RESPONSE TO 2023 NPPF

2.1 My POE draws support from various paragraphs in the NPPF that was published in 2021 [hereafter referred to as the "2021 NPPF"]. Table 1, below, lists the original paragraph no's in the 2021 NPPF referred to in my written and verbal evidence alongside to the paragraph no's in the 2023 NPPF. It also provides a brief commentary on the main changes between the relevant paragraph:

Table 1:		
2021 NPPF:	2023 NPPF:	Commentary:
• Paragraph 8	• Paragraph 8	Unchanged
• Paragraph 10	• Paragraph 10	Unchanged
• Paragraph 11	• Paragraph 11	Largely unchanged. Adjustment to footnotes referred to in this paragraph.
• Paragraph 14	• Paragraph 14	Largely unchanged. Removal of points c) and d) only.
• Paragraph 38	• Paragraph 38	Unchanged
• Paragraph 47	• Paragraph 47	Unchanged
• Paragraph 48	• Paragraph 48	Largely unchanged. Adjustment to footnotes referred to in this paragraph.
• Paragraph 60	• Paragraph 60	Largely unchanged objective (to significantly boost the supply of homes). Additional text which focuses on meeting Local Planning Authority's (LPA) identified housing need.
• Paragraph 62	• Paragraph 63	Largely unchanged objectives. Additional text which refers to establishing housing need for particular household types..
• Paragraph 73	• Paragraph 74	Unchanged
• Paragraph 74	• Paragraph 75	Unchanged objectives. Additional text which refers to LPA's monitoring deliverable land supply against housing requirements.
	• Paragraph 76	Amended to include a set of criteria for when LPAs are to identify and

		update annually a supply of specific deliverable sites.
• Paragraph 75	• Paragraph 77	Amended to refer to four years' worth of housing supply if the provisions of paragraph 226 apply; or 20% buffer is applied when failing the HDT targets over the previous three years
	• Paragraph 78	Requirement for an annual position statement when the criteria in paragraph 76 are not being met.
• Paragraph 76	• Paragraph 79	Amended to include scenarios when 85% or 75% of the Housing Delivery Test (HDT) targets are not being met over the previous three years.
• Paragraph 81	• Paragraph 85	Unchanged
• Paragraph 92	• Paragraph 96	Unchanged objectives. Additional text includes reference to beautiful buildings.
• Paragraph 95	• Paragraph 99	Unchanged
• Paragraph 98	• Paragraph 102	Unchanged
• Paragraph 111	• Paragraph 115	Unchanged
• Paragraph 119	• Paragraph 123	Unchanged
• Paragraph 124	• Paragraph 128	Unchanged
• Paragraph 126	• Paragraph 131	Unchanged
• Paragraph 132	• Paragraph 137	Unchanged
• Paragraph 130	• Paragraph 135	Unchanged
• Paragraph 134	• Paragraph 139	Unchanged
• Paragraph 137	• Paragraph 142	Unchanged
• Paragraph 138	• Paragraph 143	Unchanged
• Paragraph 145	• Paragraph 150	Unchanged
• Paragraph 147	• Paragraph 152	Unchanged
• Paragraph 148	• Paragraph 153	Unchanged
• Paragraph 174	• Paragraph 180	Unchanged objectives. Adjustment to footnote referred to in this paragraph.
• Paragraph 179	• Paragraph 185	Unchanged
• Paragraph 180	• Paragraph 186	Unchanged
• Paragraph 219	• Paragraph 225	Unchanged

- 2.2 The above table demonstrates that the vast majority of the references and objectives of the guidance contained within the 2021 NPPF has been transferred (unchanged) into the 2023 NPPF.
- 2.3 The key changes are set in paragraphs that focus on calculating 5-year housing land supply targets, the plan-making process and the implications for LPA's when failing to meet the HDT targets, as highlighted in green in Table 1 [paragraphs 11, 60, 63, 76, 77, 78 and 79]. The key changes do not relate to the paragraphs that consider how LPAs are to determine planning applications for inappropriate development on Green Belt sites, as highlighted in yellow in Table 1 [paragraphs 152 and 153], which considers 'very special circumstances' (VSC) cases which are to be determined on their own merits.
- 2.4 The Appellant's appeal case demonstrates there is a clear and compelling VSC case, as explained in my POE (**CD 3.18a**) and the Appellant's Barrister's Closing Statement, included as **Appendix 1**.
- 2.5 Fundamentally, the key considerations for the Secretary of State (SOS) remain as follows:
- 1) St Albans remains one of the worst performing LPA areas in the country in terms of housing land supply, housing delivery, an out of date local plan which is an astonishing 30 years old this year, repeat failed attempts to put in place a new local plan, and a crippling housing affordability gap as a result;
 - 2) The Council accepted at the inquiry that at least some Green Belt releases would be necessary to address this – the uncertainty being not if, but how much;
 - 3) The Council also accepted at the inquiry that the planning and housing crisis in its area was so great that a moratorium on necessary Green Belt releases pending the adoption of the new plan was untenable and that at least some Green Belt greenfield sites should come forward on a VSC basis prior to the Local Plan;
 - 4) The Council also accepted at the inquiry that the appeal site and scheme (which was the top-performing candidate GB release site for last abortive Local Plan) would not involve any more harm to the Green Belt than is inevitable for a scheme that delivers this amount of housing;
 - 5) The appeal scheme would also enable the delivery of a special needs school

for which there is a compelling unmet need.

6) The overall package of benefits in this case comprises:

Social Benefits:

- Much needed market sale homes;
- Much needed affordable homes (including social rent, intermediate, first homes);
- Much needed self-build and custom-build homes;
- Much needed land for a new education facility;
- New publicly accessible open space and playspace on the Appeal Site;
- New rights of way (ROW) across the Appeal Site to link up to other existing ROW; and
- Financial contributions that will not only mitigate the impact of the Appeal Proposals but will also benefit the local community²:
 - Expanding / improving existing local primary and nursery school facilities;
 - Expanding / improving existing SEN facilities;
 - Improving young facilities;
 - Expanding / improving existing health care facilities;
 - Library facility improvements;
 - Improving existing local sports and parks facilities;
 - Expanding / improving existing local ambulance capacity and services; and
 - Improving existing waste services.

Economic Benefits:

- 214 direct construction jobs each month over the four-year building programme (resulting in £68.6m of GVA over the construction period);
- 207 indirect jobs resulting from the construction of the Appeal Proposals (resulting in £45.8m of GVA over the construction period);
- The Appeal Proposals will accommodate approximately 1,010 additional residents, resulting in around £25.5m of economic output (GVA) per annum;
- 391 homes will generate £2.9m of convenience good expenditure, £4.5m in comparison good expenditure and £3.5m on leisure good and services per annum; and
- 391 homes will generate a New Homes Bonus for the Council of

² S106 contributions have not been taken into consideration in my planning balance / VSC case.

£796,904 and approximately £920,000 in Council Tax per annum³

Environmental Benefits:

- Improving the amount of biodiversity found on the Appeal Site and improving the diversity and quality of habitat;
 - Using off-site mitigation measures to achieve an overall 10% BNG;
 - The use of SuDS technology; and
 - Delivery of homes that are energy efficient and use less energy in accordance with the relevant building regulation standards.
- 7) The appeal scheme was recommended by the Council's case officer for approval and the appeal site was identified as strategic development site for new homes and a new school in the previous draft local plan;
 - 8) No precedent would be set by allowing this appeal – the points set out at sub-paragraphs 4 to 7 above clearly set the appeal scheme apart from others including the other scheme considered at the same inquiry which the SOS has also recovered;
 - 9) By contrast, the appeal site is arguably the least harmful location in the Green Belt: it causing no more than the minimum inevitable harm for a greenfield development of this size in the Green Belt, is located next to other development/infrastructure and delivers a unique package of benefits (as listed above). Should the appeal be dismissed, it would send a clear message that St Albans can continue to fail to meet its housing needs indefinitely because realistically no Green Belt releases can come forward pending the adoption (if and when that may happen at some indeterminate point in the future) of a new local plan. Yet the Council accepted that such a moratorium would be inappropriate and its officers recommended the appeal scheme for approval;
 - 10) Nothing in the changes to the new NPPF make the above analysis any less compelling (and axiomatically changes in policy cannot change the basic facts). The changes do not alter the VSC test nor do they absolve LPAs from any accountability for chronic failures such as those outlined in paragraph 1 above;
 - 11) It would be perfectly consistent with the evidence base at the inquiry and the intention of the new NPPF for the SOS to recognise the force and distinguishing factors of the appeal scheme and allow this appeal, but to dismiss the other appeal on the basis that the adverse effects are significantly greater, the overall balance of harm vs. benefits significantly less compelling (illustrated by the officer recommendation to refuse in that

³ Council Tax and NHB receipts have not been taken into consideration in my planning balance / VSC case.

case in contrast to the recommendation to approve the appeal scheme) and therefore that scheme should be required to make its case for an allocation in the local plan;

- 12) By contrast, based upon the evidence before the inquiry, a dismissal of the appeal scheme would be tantamount to a decision by the SOS that instead of Very Special Circumstances needing to be demonstrated that residential-led inappropriate development in the Green Belt should be allowed, there are *NO* circumstances where such development can be allowed (given the agreed position at the inquiry as set out at sub-paragraphs 2 to 4 above, in the light of the situation summarised at paragraph 1 and the differentiating features of the appeal scheme set out at sub-paragraphs 4 to 7 above). Such a stance would go well beyond the wording and intent of the new NPPF and the message it would send nationally would be as stark as it would be bleak.

2.6 Against that overarching summary, I elaborate below my conclusion that the changes in national guidance, as set out in the 2023 NPPF, do not directly affect the Appellant's case.

2.7 Notwithstanding the above, the Appellant's case draws reference to the Council's chronic performance against its 5-year housing land supply target, its plan-making process and its HDT targets which gives further weighting behind the benefits of the Appeal Scheme in the context of the following:

- The need to significant boost the supply of homes nationally;
- The Council's development plan is one of the oldest plans in the Country;
- The local plan is out-of-date (and inconsistent with the NPPF) and the Council only benefits from a 2-year housing land supply;
- The Council has failed its Housing Delivery Test since 2015/16 and the presumption in favour is engaged;
- A chronic and persistent under-delivery of market homes and affordable homes;
- A chronic under-delivery of self-build/custom-build homes for which there is a statutory duty to deliver in the district but a lack of policy basis to secure;
- The Council's acknowledged lack of urban land and recognised need for Green Belt release to meet its housing needs;
- The Council's own Green Belt Review evidence confirming that the Appeal Site displays urban fringe characteristics and would have the least harm to the Green Belt if released for housing;

- The Council had previously identified the Appeal Site for development, albeit in its unsound draft local plan;
- The need by Hertfordshire County Council (HCC) to deliver primary and SEND school facilities;
- The suitability, availability and immediate deliverability of the Appeal Site; and
- The planning officer's recommended that the outline application should be approved.

2.8 When considering the policy requirements now contained within the 2023 NPPF, the situation has become worse for the Council and HCC since the Public Inquiry took place in May 2023 which further strengthens the Appellant VSC case. This is explained in greater detail below with reference to the relevant paragraphs of the 2023 NPPF.

**Delivering a Sufficient Supply of Homes & Social Infrastructure
[Paragraphs 8, 60, 61, 64, 65, 66, 81, 99 and 150 of the 2023 NPPF]**

2.9 The standard methodology used to calculate the housing requirement in the St Albans District remains in place and unchanged. The Council has not published an alternative approach to calculating its housing requirement. It is currently using the standard methodology, as set out in paragraph 61 of the 2023 NPPF, in its Regulation 18 Draft Local Plan.

2.10 Using the current standard methodology calculations, the Council is expected to deliver 3,552 new homes over a four-year period, plus 20% (710 homes), totaling 4,262 homes. This equates to 1,065 new homes per annum. In paragraphs 6.15 to 6.17 of my POE (**CD 3.18a**) I explained that:

- The Council's expected delivery of completions over the same five-year period is 2,145 new homes. This is only 40% of its target, thereby exacerbating an already chronic and persistent shortfall in the district's housing land supply position;
- If the Council continues this trajectory of chronic under-delivery, it will hypothetically reach 0 years housing land supply in 2027/28; and
- The Council's Housing Delivery Test Action Plan (2022) (**CD 7.2**) does not set out a clear programme of delivery of specific sites (other than seven local authority owned sites (Section 5.4) that are to deliver approximately 160

homes at some point between 2022 and 2027) that would not rectify the chronic delivery shortfall.

2.11 I conclude that the amendments set out in the 2023 NPPF do not change the findings of my evidence (**CD3.18a**), nor does it improve the situation described in paragraph 2.6 which provides the context behind my evidence. In fact, the situation has deteriorated even more. An example of this worsening situation is demonstrated in Figure 3 of the Council’s latest Annual Monitoring Report (AMR, attached as **Appendix 2**). This estimates a future completion rate of 1,802 homes between 2023/24 and 2026/27. If the Council continues this trajectory of chronic under-delivery, it will only deliver 1,802 new homes over the next for year period against a target of 4,262 new homes. This is only meeting 42% of the Council’s requirement and equates to 1.7 years housing land supply (YHLS).

2.12 As such, the weighting I have given in the consideration of the appeal (as set out in my POE) remains as follows:

Harm	Degree	Weight
Definitional, openness and purposes of the Green Belt	Limited (at most)	Substantial
Local landscape character	Limited (at most)	Limited
Loss of agricultural land	Limited (at most)	Limited
Main Benefits	Weight	
Land for new school	Substantial	
Delivery of market sale homes	Very substantial	
Delivery of affordable homes (Social Rent, Intermediate & First Homes)	Very substantial	
Delivery of Self-build and Custom-build homes	Substantial	
Delivery of Open space and Children’s play space (including ROW through the Appeal Site)	Moderate	
Ecology improvements (10% BNG)	Moderate (at least)	
Socio-economic benefits: <ul style="list-style-type: none"> ○ Job creation (construction and permanent); ○ Local economic revenue 	Substantial	
Helping to raise the standard of design more generally in the area	Significant	

2.13 However, since the Public Inquiry closed in May 2023, the Council's housing delivery position has been deteriorated (as discussed in paragraph 2.9 and 2.10 above). In addition, on the basis that school infrastructure for the St Albans District is reliant on the delivery of 'strategic' housing sites which are not being approved and delivered in the District, this further delays the delivery of HCC's education infrastructure in the local area.

2.14 This adds further justification for the need to deliver new sustainable development in the St Albans District which includes more market sale homes, affordable homes, social infrastructure and jobs, all of which can be immediately delivered if the Appeal Scheme is allowed to proceed.

**Maintaining Supply and Delivery, HDT & Presumption in Favour
[Paragraphs 11, 76, 77, 78, 79, 80 and 226 of the 2023 NPPF]**

2.15 The Council is required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing, plus a 20% buffer, in order to comply with the guidance set out in paragraphs 76 77, 78, 79 and 226 of the 2023 NPPF. This is because:

- The Council's draft Local Plan has reached the Regulation 18 stage. Consequently the minimum of five years' worth of housing supply reduces to four years' worth; and
- The HDT figures published by DLUHC on 19th December 2023 demonstrates that the Council remains below 75% of the housing requirement over the previous three-years [it is currently at 55%]. Consequently, the 20% buffer is engaged, as is the presumption in favour of sustainable development.

2.16 The Council's evidence at the Public Inquiry confirmed that the Council only benefits from 2.0 years of housing land supply (YHLS) (para 4.47, **CD 5.4**) against a requirement under the 2021 NPPF to demonstrate a 5-YHLS target, plus 20% buffer. Since May 2023, the Council's housing land supply figure has reduced even more to 1.7 years (as confirmed in para 1.9 of the Council's latest Annual Monitoring Report (AMR, attached as **Appendix 2**) when applying a 4-YHLS target, plus a 20% buffer, requirement in the 2023 NPPF.

2.17 The implications of the above is that the chronic housing delivery situation in the St

Albans District has got worse since the Public Inquiry took place in May 2023 and the “presumption in favour” continues to be engaged from a housing delivery perspective in the St Alban District, in accordance with paragraph 11d), footnote 8, 79c) and 80 of the 2023 NPPF. I can, therefore, confirm that the conclusion reached in paragraph 6.85 of my POE (**CD3.18a**) remains unchanged by the changes to the 2023 NPPF. I conclude that, in terms of the titled balance, any adverse impact of granting permission would not significantly and demonstrably outweigh the substantial benefits when taken as a whole.

Other Matters to Consider

Intervention Letter

2.18 DULHC wrote to the Council on 19th December 2023 highlighting that:

- The Council is one of only 12 LPAs who have failed to adopt a local plan prepared in accordance with the 2004 Act; and
- The Council is one of only seven who are not currently taking their draft plan through the examination process; and
- The Council has left its communities vulnerable to speculative development and has risked not delivering the economic growth and infrastructure they need.

2.19 In order to ensure full and effective coverage of the St Albans District by a development plan, DULHC has directed the Council to revise and reduce its Local Development Scheme (LDS) program within 12-weeks of the publication of the 2023 NPPF, particularly given:

- The length of time since the Council has had an up-to-date plan in place for its area; and
- The proximity of the end of the current planning system – 30th June 2025.

2.20 I consider the context behind the SOS’s intervention letter is now a material consideration in the determination of this appeal. In the interim period between now and when the Council adopted a new Local Plan, there is a clear need and justification for DLUHC to allow appeals that will deliver sustainable forms of development in the St Albans District which includes more market sale homes, affordable homes, social infrastructure and jobs, all of which can be immediately

delivered in the Appeal Scheme is allowed to proceed.

The Council's Position on the changes including in the 2023 NPPF

- 2.21 On 15th January 2024, the Council resolved to refuse outline planning permission (ref: 5/2022/0267/LSM) for up to 95 dwellings, including 40% affordable dwellings and 5% self-build and custom build dwellings, public open space, landscaping and associated infrastructure at Land Between Caravan Site and Watling Street Park Street in St Albans. This is a green belt site and the proposals were recommended for approval by the Council's Officer on the basis that very special circumstances existed in this case to support the proposals.
- 2.22 At paragraph 8.4.7 of the Council Officer's Report, it is explained that "*...the updates to the NPPF has not in the view of Officers significantly altered the way development proposals in the Green Belt should be determined. The changes to the NPPF primarily relate to the plan-making process. Therefore, as noted above, notwithstanding the changes made to the NPPF, the officer recommendation on this application remains unchanged*".
- 2.23 The Appellant therefore would expect the Council to advise DLUHC of a similar conclusion in respect of this appeal case, that the changes to the NPPF primarily relate to the plan-making process. This will be clarified in the NPPF Position Statement currently being prepared by the Council.
- 2.24 Notwithstanding the above, when considering context behind the SOS's intervention letter and the Council's chronic housing and social infrastructure delivery record since 2015/16, there is a clear need and justification for Central Government to allow appeals that will deliver sustainable forms of development in the St Albans District which includes more market sale homes, affordable homes, social infrastructure and jobs, all of which can be immediately delivered if the Appeal Scheme is allowed to proceed.

3.0 CONCLUSION

- 3.1 I conclude that the changes to the NPPF do not affect the Appellant's case, as set out in my POE (**CD3.18a**).
- 3.2 Notwithstanding this, the Appellant's case draws reference to the Council's chronic performance against its housing land supply target, its plan-making process and its HDT targets give further weighting behind the benefits of the Appeal Scheme. In this context, which has been further exacerbated since the Public Inquiry closed in May 2023, the Council's housing delivery position and HCC's education infrastructure position has been further eroded. I conclude this adds further justification for DLUHC to allow proposals for new sustainable form of development in the St Albans District which includes more market sale homes, affordable homes, social infrastructure and jobs, all of which can be immediately delivered if the Appeal Scheme is allowed to proceed.
- 3.3 In my opinion, if the Council does not allow proposals for new sustainable forms of development (like the Appeal Scheme) to be delivered, then the chronic eye-watering under-delivery of homes and infrastructure in the St Albans District will continue to get worse. This must not continue to be ignored and opportunities that present themselves to help resolve this dire situation should be supported at local and national level.

IN THE MATTER OF AN APPEAL PURSUANT TO SECTION 78 OF
THE TOWN AND COUNTRY PLANNING ACT 1990

LAND SOUTH OF CHISWELL GREEN LANE, CHISWELL GREEN,
ST ALBANS

APPELLANTS' CLOSING SUBMISSIONS

I. THE HOUSING EMERGENCY IN ST ALBANS

1. Nowhere is the national housing crisis more acutely evident than St Albans. Mr Kenworthy and Mr Parker have detailed the true extent of the crisis in St Albans, without any challenge in XX from the Council or any contrary evidence from Mr Connell. Indeed, the Council expressly agrees with much of the Appellants' evidence on this issue in the SOCG.¹

(1) Supply of market housing

2. The Council's supply of market homes has collapsed. The best-case scenario for the Council is a housing land supply of 2 years.² This is less than half the required minimum and equates to a shortfall of 3,195 homes.³ At best, the Council will be able to deliver only 40% of its local housing need over the next five years.⁴ Further, the Council's housing supply is in freefall: it has fallen from 3.49 years in 2017 and since the introduction of the NPPF in 2012 the Council has met its annual housing target on only a single occasion (at the start of that period in 2013/14).⁵

3. The collapse of the Council's housing supply has caused an inevitable under delivery of homes in the District. The Council has failed to meet the Housing Delivery Test ("**HDT**") since 2016/17, even when the targets were artificially reduced due to

¹ CD 3.27

² CD 3.18a - Mr Kenworthy's POE at [6.12], final bullet point on p. 52/PDF p. 55.

³ Ibid.

⁴ Ibid at [6.165] on p. 53/PDF p. 56.

⁵ CD 3.18a - Mr Kenworthy's POE at [6.12], see the table and final bullet point on pp. 51 - 52/PDF pp. 54 - 55.

Coronavirus. Moreover, these failures have not been near misses: the Council has not even achieved 75% on the HDT in the period since 2016/17.⁶

(2) Supply of affordable housing

4. The Council's supply of affordable homes is in an even more precarious – it is on life support.
5. In the period 2017/18 – 2021/22 the Council has an accumulated delivery shortfall of 4,360 affordable homes.⁷ This extreme level of need is the inevitable product of the Council's chronic failure to deliver affordable housing: in the last 28 years the Council has delivered only 18% of all housing completions (net) as affordable housing and in the most recent five year period, the Council has averaged only 92 affordable dwellings per annum.
6. Looking forward, the Council is only able to demonstrate a supply of 395 affordable homes over the next five years: an equivalent of 79 affordable homes per annum – even less than it has delivered over the last five years.⁸ Just like the Council's supply of market housing, the position is going from bad to worse. The ultimate position is that the Council has a shortfall of 5,507 affordable homes over the next five years.⁹ This is a staggering shortfall, made all the worse by the fact that the affordability of homes in the District is getting worse, both when looked at in isolation and by comparison to England as a whole.¹⁰ The real life position is that almost half of households in the District are unable to afford to access the lower quartile private rented housing.¹¹

(3) Supply of self-build/custom housing

7. The Council's development plan is entirely silent on the provision of self-build housing. This is unsurprising, given the age of the Local Plan, but the inevitable consequence is that the Council is significantly failing to deliver the necessary supply of self-build housing. The Council's own data indicates a shortfall of 171 self build

⁶ CD 3.18a – Mr Kenworthy's POE at [6.13] – [6.14] on p. 52/PDF p. 55.

⁷ CD 3.22a – Mr Parker's POE at figure 4.1.5 on p. 20.

⁸ CD 3.22a – Mr Parker's POE at [4.2.1] on p. 21.

⁹ CD 3.22a – Mr Parker's POE at figure 4.2.2.

¹⁰ CD 3.22a – Mr Parker's POE at [5.2] on p. 24.

¹¹ CD 3.22a – Mr Parker's POE at [5.8] on p. 26.

homes.¹² This is an overall delivery rate of only 20%.¹³ However, these figures are likely to be unduly optimistic, with need being significantly greater than the Council's records indicate.¹⁴

(4) The Council's abdication of plan making responsibilities

8. One of the most striking aspects of the housing crisis in St Albans is the absence of any meaningful response from the Council.
9. The Council has published a HDT Action Plan in 2022, but this only contains measures to deliver approximately 160 homes in the period to 2027.¹⁵ This is not even a meaningful start in tackling the shortfall of over 3,000 homes in the same period. It is frankly embarrassing.
10. The only additional evidence presented by Mr Connell was the Council's Local Development Scheme, indicating a best-case adoption of a new local plan in 2025. However, as Mr Connell confirmed in XX, this was simply a date that he had been presented with by the Council's officers: Mr Connell had taken no steps to interrogate that date or to consider whether it was realistic. Of course, when the LDS is interrogated, it is obviously optimistic. For example, it proposes 18 months from publication of the reg. 19 plan to adoption. In the context of a Green Belt Authority with multiple previous failures at adopting a local plan, this is unrealistic (especially given the potential further disruption from revisions to the NPPF). Ultimately, not only is there potential for delay at all stages of the plan-making process, as Mr Connell accepted, but in fact such delay is likely and quite possibly inevitable.
11. The Local Plan is almost 30 years old. It is from a different era and it is not fit for purpose. It is out of date in multiple respects: first, because of the absence of a 5YHLS; secondly, because of the persistent HDT failures; and thirdly, because the most important policies are out of date - those policies are inconsistent with the NPPF and, taken as a whole, the Local Plan does not plan for the up to date needs in its district, instead persisting with a failing and unjustifiable spatial strategy. Worse still, the Council has repeatedly failed to remedy this situation: the Council has failed to adopt

¹² CD 3.22a - Mr Parker's POE at [7.21] on p. 40.

¹³ Ibid.

¹⁴ CD 3.22a - Mr Parker's POE at [7.22] on p. 41.

¹⁵ CD 3.18a - Mr Kenworthy's POE at [6.17] on p. 53/PDF p. 56.

a new local plan on at least two previous occasions and is currently operating in a policy vacuum.

12. Stepping back and looking at matters in the round, there is quite obviously a sustained and significant failure of plan making in the District. This is a significant material consideration in its own right, as Mr Kenworthy explained without challenge.¹⁶ Indeed, it is a failure that the Council itself has recognised as far back as 2018 – some five years ago – when the Chairman of the Planning Policy Committee said:

'[...] we desperately need a new Local Plan. There hasn't been enough, or the right type of development of either housing or commercial premises in this District for a generation.

- *Over the last 20 – 30 years, our population has grown very significantly. Many local people have been priced out of living in the District.*
- *Young people cannot afford to rent or buy so have to remain in their parents [sic.] homes.*
- *If they can afford to rent, they cannot afford to buy and struggle when they start families.*
- *People on lower incomes are particularly badly hit. They cannot afford market rents and affordable or social homes are not available.*
- *Children are being brought up in tiny flats that are completely unsuitable for their needs, with parents made ill by the overcrowded conditions they are living in.*

13. These are the real-life consequences of the Council's abdication of its plan making responsibilities. There is no end in sight. This is not a position that can be allowed to continue: it is contrary to the established national objective of significantly boosting the supply of housing and it is having severe consequences for the families living in the District.

(5) The need to build houses in the Green Belt

14. The root cause of the housing emergency in the District is the Council's failure to get to grips with plan-making, and in particular the Green Belt in its area. However, assessed objectively, the issue is straightforward: there is insufficient land outside the

¹⁶ CD 3.18a – Mr Kenworthy's POE at [3.21] – relying on the appeal decisions at CD 9.21 at DL 24 – 25 and CD 9.22 at DL 21 and IR 115.

Green Belt to meet housing need and thus it is inevitable that housing must be delivered in the Green Belt.

15. Mr Kenworthy's unchallenged analysis (based on the Council's own data) is that at best 14% of the District's housing need can be accommodated within urban areas.¹⁷ It follows that on any reasonable view, it will be necessary of the Council to deliver housing in the Green Belt. The Council cannot wish away the remaining 86% of need. Indeed, as Mr Connell accepted in XX, the Council's latest published position within its most recent HDT action plan is that it will seek to meet all of its housing need in the next Local Plan.¹⁸ However, even if housing need was slashed in half, as Daisy Cooper MP speculated, it will remain necessary to deliver housing on the Green Belt, as Mr Connell accepted in XX (and importantly he was not re-examined on this point).
16. Further, it is necessary to deliver housing on the Green Belt now. There is no moratorium on development in the Green Belt, as Mr Connell accepted in XX (he was not re-examined on this point either). In the absence of any moratorium and in the absence of any prematurity argument, good planning requires the delivery of housing in the Green Belt now. More than that, there needs to be the delivery of a range of houses on a range of sites. Any other approach would not be in the interests of good planning in the District and it would be callous to ignore the very real needs of the people living in the District.

II. EFFECT OF THE DEVELOPMENT ON THE GREEN BELT (MAIN ISSUE 1)

(1) The appropriateness of the southern appeal site

17. Through the Green Belt Review Sites and Boundaries Study the Council has comprehensively assessed the potential for strategic sites in the Green Belt.¹⁹ The output of that assessment is clear: sub-area 8 is the most suitable strategic parcel for

¹⁷ CD 3.18a – Mr Kenworthy's POE at [4.34] final bullet point on p. 34/PDF p. 37.

¹⁸ See CD 8.25 at p. 19 (third row, third column). The Council's only response was to suggest that the position as uncertain and the Council might seek to meet a lower level of need. This is no answer. The Council relied on the AMR (CD 5.19) at [3.9] on p. 30, but all that this says is that the Council will review the position – there is no indication that the Council will choose a lower figure than local housing need calculated via the standard method. Even if the position is uncertain (which is not accepted, given CD 8.25), this does not assist the Council: the starting point (under both the current NPPF and the track-changed version) is local housing need calculated via the standard method. Exceptional circumstances are required to take a different approach but have not been demonstrated. Therefore if the position is uncertain, the appropriate approach is to assess matters on the basis that the Council will apply the NPPF and meet its local housing need in full.

¹⁹ CD 8.5.

development; the eastern part of sub-area 8 is the most suitable part of that strategic parcel; and the southern appeal site is the most suitable site within that eastern part.²⁰ The southern appeal site is the top of the top of the top when it comes to development in the Green Belt. The fact that its relative size compared to other sites may have contributed to this (cf Council Closing Submissions para. 22(2)(c)) is beside the point: what matters is that as a means of delivering a development of the scale proposed by the appeal scheme somewhere in the St Albans Green Belt, the appeal site and appeal scheme can do so at the lowest possible cost to the Green Belt. Indeed this is clearly corroborated by the Council's own acceptance at the inquiry that the appeal scheme would cause no more than inevitable harm for a development of this scale in the Green Belt..

18. This analysis is consistent with the earlier allocation in the emerging local plan. It is agreed that the emerging local plan cannot be given any weight now, but it is relevant to consider the prospect of allocation. As to this, the Council has withdrawn Mr Connell's suggestion that the southern appeal site will not be allocated in the next Local Plan – **in XX he accepted "it's a likelihood" (his exact words) that the site would indeed be allocated.** This concession (which the Council's closing submissions wholly improperly resile from, without any evidential basis)²¹ was rightly made given (i) the acceptance that there is a need for at least some Green Belt release, including on strategic sites,²² which Mr Connell acknowledged would be necessary even with a new local plan requirement figure sought to meet just a quarter of currently identified housing need given the findings of the Urban Capacity Study; (ii) the findings of the Green Belt Review which still hold good today; and (iii) the common ground with the Council that the proposed development would cause no more than the minimum inevitable level of harm associated with developing 391 homes in the Green Belt. Given these factors, you can have a high degree of confidence that the southern appeal site would be allocated in due course for residential development of this scale (likely including the provision of land for a school as well, given HCC's clear statement that

²⁰ See CD 8.5 at table 9.1 on p. 113/PDF p. 119 and p. 101/PDF p. 107.

²¹ Council Closing submissions para. 12.

²² Mr Connell accepted in XX that any green belt release in the new local plan when finally adopted would involve at least some strategic sites. Accordingly, given that the appeal site is the top-ranking strategic site, the uncertainties referred to at para. 9 of the Council's closing submissions do not affect the prospect of the appeal site being allocated.

such land is required for further development in Chiswell Green) if and when the Council finally gets a new local plan in place.²³

19. The Council and the Appellants are agreed that significant weight should be given to the Green Belt Review.²⁴ However, belatedly, the Council has sought to caveat this agreement on the basis that there has been a material change of circumstances with the closure of Butterfly World. This is incorrect for the two reasons.
20. First, the unauthorised development against which the Council has taken enforcement action (the unauthorised change of use and the failure to remove the temporary toilet block) occurred after Butterfly World closed in 2015 and post-dates of the Green Belt Review. Therefore the enforcement action even if successfully defended on appeal would revert the position back to that at the time of the Green Belt Review. Accordingly, this unauthorised development (including its subsequent removal, if enforcement action is successful) is not a change of circumstances which materially changes the the baseline from that which was assessed in the Green Belt Review. Insofar as there is any other unauthorised development within Butterfly World, it is now too late for the Council to take enforcement action against that development, as Mr Connell accepted in XX.
21. Secondly, there is no indication that the Green Belt Review was based on the assumption that the permitted dome within Butterfly World would be built out in full. To the contrary, it is clear that the Green Belt Review assessed the Green Belt as it existed in 2014: all of the descriptions are in the present tense without any suggestion of future development.²⁵ Further, there would be no basis for that assumption. Planning permission for the dome was granted in 2005, some nine years previously, with development commenced before 2010 with the ground works, hard standing and pouring of concrete base of the dome.²⁶ Accordingly, the development was already delayed at the date of the Green Belt Review, as the assessors would have appreciated, and thus there would have been no basis for them to base their assessment on the assumption of completion.

²³ For example, CD 3.16 – Education SOCG at [2.8] on p. 3/PDF p. 4.

²⁴ CD 5.4 – Mr Connell’s POE at [4.12] on p. 20, confirming the relevance of the GBR; and in XiC when Mr Connell explained that he gave this significant weight.

²⁵ CD 8.5 at [10.1.3], [10.1.4], [10.4.3] – [10.4.12] and the table on p. 101/PDF p. 107.

²⁶ CD 3.18b at PDF p. 61 ff – see in particular condition 1 requiring commencement of development by 2010.

22. Thirdly, it is important to read the Green Belt Review's reference to Butterfly World in context. The full passage (CD 8.5, para. 10.1.4) reads as follows:

"However, the sub-area identified on pasture land at Chiswell Green Lane displays particular urban fringe characteristics due to its proximity to the settlement edge and Butterfly World along Miriam Road to the west. This development bounds the outer extent of the pasture land and creates a physical barrier to the open countryside."

23. As Mr Friend accepted in XX from his landscape and visual perspective, this observation remains good. The Green Belt Review's identification of urban fringe characteristics of the site were due to both the settlement edge (which has not changed since) and Butterfly World, which on any view in its lawful state would be a previously developed site with significant hardstanding and other physical development (as the aerial image in the Keep Chiswell Green presentation made abundantly clear) - containing development which at the time it was authorised was recognised as inappropriate development in the Green Belt (see CD 5.13-5.17)²⁷. Mr Friend accepted in XX that these two factors continue to contribute to the site having urban fringe characteristics from a landscape and visual perspective. He also accepted that in its lawful state (i.e. discounting the matters which are the subject of the ongoing enforcement action) the site continues to separate the appeal site from the open countryside. The observations of the Green Belt Review in this respect therefore remain fully valid.

24. The Appellant on the northern appeal site has argued that the Green Belt Review should be afforded less weight because of the Examining Inspector's comments on the withdrawn local plan. This argument is incorrect. The Inspector's concern was that the Council had failed to assess small scale sub areas, i.e. non-strategic small sites.²⁸ The Inspector did not have any concerns about the assessment of strategic sites. It follows that this is not a basis to reduce the weight to be afforded to the Green Belt Review.

25. In the Council's closing submissions at para. 22(2)(c), Mr Parkinson advanced a new point against the Green Belt review, not made in evidence or otherwise previously

²⁷ Note also that the extent of lawful development on the Butterfly World site (the hardstanding, the 'crater' foundations of the dome, and the unenforced-against built form) would on the Council's own definition of openness at para. 18ff of their closing submissions be significant detractors to the Green Belt.

²⁸ CD 4.77.15 at IR 33 and IR 37.

foreshadowed: namely that “the GBR did not assess the cumulative effect of both the North and the South sites coming forward at the same time”. This new point is a bad one given that Ms Toyne’s cumulative assessment for the Appellant was not challenged in XX or otherwise contradicted at the inquiry. In any event it does not affect the standalone merits of the southern appeal site and the appeal scheme.

26. Accordingly the conclusions of Green Belt Review in relation to the site continue to hold good today without caveat, and there is no good basis for departing from them. On this basis, the only proper conclusion is that the southern appeal site is the most appropriate site for strategic residential development. There is no alternative analysis.

(2) Green Belt – baseline analysis

27. In the baseline analysis, the southern appeal site makes a limited contribution to the openness of the Green Belt.
28. In respect of parcel S8, the Green Belt Review explains that there is a ‘sense of enclosure’ in the parcel and that ‘urban fringe elements are prominent, particularly [...] [the] built edge of settlements’.²⁹ This is especially the case ‘at a local level [where] Butterfly World forms a distinctive feature to the west of Chiswell Green’.³⁰ Further, the Green Belt Review highlights that the land around Chiswell Green Lane, including the southern appeal site, ‘displays particular urban fringe characteristics due to its proximity to the settlement edge and Butterfly World along Miriam Road to the west. This development bounds the outer extent of the pasture land and creates a physical barrier to the open countryside. The pasture land displays greater levels of landscape enclosure due to localised planting along field boundaries. This creates potential to integrate development into the landscape with lower impact on views from the wider countryside and surroundings.’³¹ On this basis, the Green Belt Review concludes that the land immediately adjacent to Chiswell Green, including the southern appeal site, ‘makes a limited or no contribution towards all Green Belt Purposes’ (emphasis added).³²
29. Ms Toyne’s analysis – in particular through the BWNS Green Belt Review - was consistent with these findings. As to openness, Ms Toyne explained through her

²⁹ CD 8.5 at [10.1.3] on p. 97/PDF p. 103.

³⁰ Ibid.

³¹ CD 8.5 at [10.1.4] on p. 97/PDF p. 103.

³² Ibid.

evidence that the principal contribution to openness is in the spatial dimension, because the appeal site is largely undeveloped, but there is no meaningful contribution to the visual aspect of openness: the existing vegetated boundaries truncate views, limiting intervisibility between the southern appeal site and the remaining Green Belt to the west; views from the settlement edge towards the appeal site are also interrupted in part by the existing field boundary vegetation; and as such any appreciation of openness is limited to the immediate locality of the Appeal Site, with no perception of openness beyond the roads and residential properties that immediately adjoin the Site.³³

30. Further, as to the purposes of including land within the Green Belt, Ms Toyne found that the appeal site made only a partial contribution to a single Green Belt purpose, namely preventing encroachment into the countryside.³⁴ This is entirely in accordance with the Green Belt Review.
31. The Council's challenge to Ms Toyne's assessment of the baseline was limited. As to openness, the Council did not identify any deficiencies in Ms Toyne's analysis. In particular:
 - (a) The largely undeveloped nature of the southern appeal site is agreed and was expressly part of Ms Toyne's analysis. There was no omission in her analysis in this regard.
 - (b) The Council's case in XX focussed in on very close distance views from private residential properties. Again, these had been taken into account by Ms Toyne and there was no omission in her analysis.
 - (c) There was a suggestion that longer views from outside the Green Belt looking west were relevant. Aside from the fact that Mr Friend provides little if any analysis of these views in Green Belt terms, there is only a very limited extent of visibility as Ms Toyne explained, consistently with the Green Belt Review.

³³ CD 3.19a - Ms Toyne's POE at [5.20] - [5.21] on pp. 46 - 47.

³⁴ Ibid at [5.51] on p. 55.

(d) The extent of activity from the existing riding school was acknowledged expressly by Ms Toyne in her evidence and there was no omission in this regard.³⁵

32. In respect of Green Belt purposes, the Council's case at inquiry evolved beyond its earlier written analysis. In particular, on the first Green Belt purpose, checking the unrestricted sprawl of built up areas, Mr Connell advanced the contention for the first time in XiC that Chiswell Green was a large built up area. This was not foreshadowed in his POE. The absence of earlier analysis only underscored the weakness of this argument and Ms Toyne was right to reject it. Neither the Council's own Green Belt Review nor the BWNS Green Belt review considered Chiswell Green to be a large built up area for this purpose. That is the right analysis, reflecting the Council's own assessment of the different tiers of settlements, where Chiswell Green is not in the top tier as a large built up area.³⁶
33. The Council based its case in XX on the appeal decision relating to Burston Garden Centre (another argument not in Mr Connell's evidence).³⁷ This is a site on the other side of St Albans, beyond the North Orbital Road. The Council sought to argue that a finding of harm to the first Green Belt purpose in that case meant that there was also harm to the same Green Belt purpose in this case. This is flawed in multiple respects. First, the comparison of two different sites on different sides of Chiswell Green is simplistic. A site specific and scheme specific analysis is required. Secondly, on closer examination, it is apparent that the Inspector's concerns in that case – which was about the separation between Chiswell Green and How Wood Village – is not a concern in this case, given (1) the location of How Wood Village; and (2) the close relationship between the southern appeal site and Chiswell Green in this case, which was not replicated in the other appeal decision where the Inspector noted '*a degree of separation*' from Chiswell Green. Thirdly, there is no supporting reasoning which explains either: (1) how (or if) the Inspector grappled with the Green Belt Review; and/or (2) how Chiswell Green and How Wood Village are large built up areas for the purposes of the first Green Belt purpose (in particular, in the face of the Green Belt Review). Ultimately, this appeal decision provides no tenable basis for reaching a different view to Ms Toyne and the Green Belt Review in this case.

³⁵ See in particular the RPOE

³⁶ CD 8.3a at p. 19/p. 24.

³⁷ CD 9.16

34. On the second Green Belt purpose, the Council pinned its case on a simplistic recitation of the “thousand cuts” argument. The deficiency with this argument is that it requires site by site appraisal, not broad brush statements of principle. As Ms Toyne explained in response, when one focuses in on the southern appeal site, it is clear that the development of this parcel will not contribute to the merging of neighbouring towns, given its high levels of enclosure and relationship with Chiswell Green, being wrapped around by existing development from residential properties and Butterfly World. Accordingly, there is no merging effect.
35. It follows that Ms Toyne’s assessment of the baseline is to be preferred.

(3) Effect on Green Belt openness and purposes

36. As to the effect of the proposed development, although the parties differed on their precise assessments, it was agreed by both of the Council’s witnesses that the harm to the Green Belt from the proposed development was no more than that which would inevitably arise from a residential development of this scale within the Green Belt in this District. There is no excess or egregious harm; rather that harm has been minimised to the lowest possible extent.
37. Ultimately, this is fatal to the Council’s case (given the acceptance that some Green Belt release is needed to address the massive unmet needs and that there should be no moratorium on that until such time as a new local plan is finally adopted). It is possible to argue – as the Council sought to do in XX of Mr Kenworthy as to whether or not the substantial weight to the Green Belt harm should be graduated or calibrated to the extent of effect, but in this case such an argument is arid because it makes no difference. The parties are agreed that nothing more than the minimum, inevitable, harm to the Green Belt is caused by the proposed development and thus, when paragraph 148 of the NPPF is applied, the substantial weight to be afforded to that harm is the same on either parties’ analysis – it is substantial weight reflecting a minimum level of harm.
38. Insofar as it is necessary to go beyond this analysis, the Appellant submit that Ms Toyne’s assessment of effects is to be preferred. Overall, she concluded that there was limited harm to the Green Belt, having regard to both the impact on openness and Green Belt purposes.³⁸ Mr Kenworthy struck his planning balance on this basis. There

³⁸ CD 3.19a – Ms Toyne’s POE at [5.56] on p. 56.

was no inconsistency as the Council suggested in XX: that inconsistency was illusory because it was based on individual component parts of Ms Toyne's analysis, not her overall conclusion on the degree of harm.

39. Further, in XX of Mr Kenworthy and Ms Toyne the Council sought to adopt a mathematical approach, taking the assessment of different elements and adding them up to create a higher level of harm. This approach is wrong as a matter of principle: the assessment of harm is not a mathematical exercise, but instead requires a holistic overall conclusion. That was Ms Toyne's approach and she was correct to do so.
40. As to spatial openness, Ms Toyne acknowledged that there would be harm to this dimension, but in so doing she also, rightly, had regard to the proposed development in its entirety, in particular the substantial areas that would not be developed. The Council challenged the precise figure in this regard on the basis that the school should be included, but even on this basis, the increase in the percentage of developed area would not be significant, as Ms Toyne explained.
41. As to visual openness, the Council reiterated its arguments about adjacent residential properties, but the more that this argument was reiterated, the clearer it became that the effects on visual openness were very limited – these were the only views that the Council could point to in support of its case. Ms Toyne took these matters into account, but they did not materially increase her assessment of harm. This was the same conclusion as the Council's officers who were of the view that *'there is no additional harm to openness as a result of the limited visual impact on openness of the Green Belt'*.³⁹
42. As to Green Belt purposes, the proposed development would only cause very limited harm to the third Green Belt purpose and that harm would be confined to the southern appeal site itself.⁴⁰ Although the southern appeal site makes a partial contribution to this purpose and there would be development within the countryside, the level of harm is significantly mitigated by (1) the existing urban fringe influences in the baseline position; and (2) the fact that following the development there will be a strong, defensible, Green Belt boundary, enclosing the development with Chiswell Green.
43. In respect of this purpose, the Council focussed in XX of Ms Toyne on the fact that the urban influences could be stronger if Butterfly World had been completely built out.

³⁹ CD 3.4 at [8.3.9] on PDF p. 94.

⁴⁰ CD 3.19a – Ms Toyne's POE at [5.49] on p. 54.

That might be right, but it is of no consequence: as the Green Belt review has found, the current form of Butterfly World (and the other existing development) already imposes a substantial urban fringe influence on the appeal site. Ms Toyne's assessment was based on what is on the ground today, not what might have been. Thus, the Council's argument goes nowhere.

44. There has been no challenge to Ms Toyne's assessment of cumulative impacts. Indeed, this is a matter to which Mr Friend devotes three, essentially inconsequential, paragraphs in his POE. Accordingly, for the reasons that Ms Toyne gives, there is no basis for refusing to grant planning permission because of the cumulative impacts of the development but, even if this was a concern, the clear - and undisputed - preference must be for the development of the southern appeal site with its lower levels of harm.⁴¹
45. Finally, an important lacunae in the Council's assessment was its failure to take proper account of the positive effects that the proposed development will have on the Green Belt through the formation of a strong boundary on the western edge. The boundary features already exist there, with Miriam Lane and Butterfly World, but at present the urban edge is raw. Following the proposed development, there will be substantial landscaping on the western side, softening the impact of the urban form, reinforcing the existing boundary features and reducing the urban fringe impacts on the Green Belt. This is an important factor that tempers the harm to the Green Belt.
46. We also note for completeness that no party has challenged the Appellant's evidence on the comparative impacts of the South and North schemes.

(4) Conclusion on this main issue

47. The starting point is that the southern appeal site represents the most appropriate site for strategic residential development within the Green Belt. As the Green Belt Review rightly concludes, the site is the most suitable part of area S8, that area as a whole being ranked No1 within the Tier 1 of the strategic sites that were assessed. It is the top of the top of the top.
48. Notwithstanding the Council's minor quibbles as to the extent of Green Belt effects, the ultimate position is that any harm arising from the proposed development is only

⁴¹ CD 3.19a - Ms Toyne's POE at [7.44] on p. 72.

that which would arise inevitably from the any strategic residential-led development within the District's Green Belt. This was accepted in terms by both of the Council's witnesses.

49. Once it is accepted – as the Council's witness have – that development in the Green Belt is necessary and there is no moratorium on Green Belt development, then it follows from the above that there can be no tenable objection to the proposed development on Green Belt grounds. There is no better way of meeting the need for strategic residential development: it is the most appropriate site and any harm arising is only that which would inevitably arise from any such development in the District's Green Belt.

III. LANDSCAPE AND VISUAL IMPACTS (MAIN ISSUE 2)

(1) Impact on landscape character

50. The starting point – and end point – is the agreement between the Council and the Appellants that there is only a limited degree of harm to landscape character and that only limited weight should be afforded to that harm.⁴² Mr Friend also agreed in XX that the level of harm was no more than inevitable for development of this scale on a green field site in the district.
51. This agreement reflects the fact that there were only two – very minor and ultimately immaterial – points of dispute between Mr Friend and Ms Toyne.
52. The first point of dispute relates to the effect on the character of the site in year 15. Ms Toyne's evidence is to be preferred and the proper conclusion is that at year 15 there will be a neutral on site effect. Although the character of the site would change, the proposed development would establish positive characteristic features across the southern appeal site, thus responding to the published landscape guidance and policy, as well as mitigating the adverse effects of the proposed development itself.⁴³ This would ensure the sensitive assimilation into the settlement and an overall improvement to the edge of Chiswell Green. Mr Friend's analysis erroneously

⁴² CD 3.12 – SOCG – at p. 30/PDF p. 33.

⁴³ CD 3.25 at [1.21] on p. 4/PDF p. 8.

focussed on the adverse effects in isolation, rather than balancing both the landscape character harms and benefits.⁴⁴

53. The second point of dispute concerns the effect on native hedgerows in year 15. Both Ms Toyne and Mr Friend agree that there will be a beneficial effect on this receptor and the dispute is only one of extent. As to this, Mr Friend based his position on the fact that some hedgerow would be removed for the creation of accesses. However, this is an incomplete assessment because the proposed structural planting will result in an overall net gain in native hedgerow length and quality.⁴⁵ This justifies the moderate beneficial effect described by Ms Toyne.

(2) Visual effects of the proposed development

54. The reason for refusal only refers to harm to landscape character.⁴⁶ There is no allegation of adverse visual effects. Mr Friend's decision to allege such effects was thus contrary to art. 35 of the Development Management Procedure Order and unreasonable. This was all the more the case given the alleged adverse visual effects were unjustified.
55. There was no methodological dispute between Mr Friend and Ms Toyne. Instead Mr Friend purported to dispute the value of the receptors in residential properties on the settlement edge of Chiswell Green.⁴⁷ There was no justification for these receptors to be given a high value. The agreed methodology ascribed a high value to a *'view off/from a location that is likely to be of national importance, either designated or with national cultural associations'*. Plainly these views do not have national cultural associations. Further, they are not designated for their visual value. Mr Friend's reliance on the Green Belt designation was in error: that is a spatial designation, not a landscape designation, and the visual component of openness does not change this because it is concerned with the extent of visibility, not the quality or value of a view. Mr Friend's error is all the more apparent given the protection of views from private properties is not a purpose of including land in the Green Belt.

⁴⁴ Ibid.

⁴⁵ CD 3.25 at [1.18] on p. 4/PDF p. 8. See also CD 2.18 (BNG assessment) at p. 9.

⁴⁶ CD 3.7 - 'the harm also related to landscape character'.

⁴⁷ There was agreement that these were high susceptibility receptors, in accordance with the LVIA's methodology.

56. It follows that Ms Toyne’s assessment of visual effects is to be preferred. In any event, Mr Friend’s criticisms had no consequence because Mr Connell did not depart from his limited weighting on this issue (and did not add any additional component of harm to his planning balance).

(3) Conclusion on this main issue

57. Ultimately, the proposed development would only give rise to a limited adverse effect on landscape character. That level of harm does not give rise to any policy conflict, even on Mr Friend’s case. This is not an immaterial point as the Council suggested in XX of Mr Kenworthy.⁴⁸ Neither the NPPF nor the Local Plan impose a no harm test. Rather, they seek to consider whether the effects are acceptable. A limited adverse effect when delivering a strategic residential development is an acceptable, policy compliant, effect, as the OR and the Appellants’ witnesses concluded.⁴⁹

IV. THE EFFECT ON BEST AND MOST VERSATILE AGRICULTURAL LAND
(MAIN ISSUE 3)

58. The Council’s objection to the loss of agricultural land is inexplicable for multiple reasons.

59. First, over 90% of the land within the District is classified as Grade 3, like the southern appeal site.⁵⁰ It follows that if strategic residential sites are to come forward – as they must – then it is inevitable that sites with the same agricultural land classification will be lost.

60. Secondly, the southern appeal site makes no contribution to the agricultural productivity of the district. It has not been in productive agricultural use for more than 20 years and there is no prospect of this changing.⁵¹ The southern appeal site is fundamentally unsuited to a modern, intensive, agricultural enterprise, being an isolated block of land, adjacent to the urban edge and severed from any wider agricultural land.⁵² Accordingly, the loss of this agricultural land would have no effect

⁴⁸ And in Opening – ID3 at [24].

⁴⁹ CD 3.4 at [8.5.17] on PDF p. 104.

⁵⁰ CD 3.20a – Ms Tindale’s POE at [3.6] on p. 6/PDF p. 8.

⁵¹ CD 3.20a – Ms Tindales’ POE at [3.14] – [3.15] on p. 8/PDF p. 10.

⁵² CD 3.20a – Ms Tindale’s POE at [3.16] on p. 8/PDF p. 10.

on the agricultural productivity of the District. In none of these respects was the Appellant's evidence challenged.

61. Thirdly, the loss of agricultural land does not give rise to any policy conflict. The Council's reasons for refusal do not allege any conflict with the Local Plan on this issue.⁵³ Further, there is no conflict with NPPF para. 174(b), as Mr Connell accepted in XX. That paragraph simply requires the benefits of best and most versatile agricultural land to be taken into account – it does not seek a particular outcome. But in any event, the land in this case does not give rise to any agricultural or economic benefit, given the enduring absence of productive agriculture.
62. It follows that there is, at worst, limited harm arising from the loss of agricultural land and this should be afforded limited weight. This is agreed between the Appellants and the Council.⁵⁴

V. HIGHWAYS AND TRANSPORT (MAIN ISSUE 4)

63. Neither the Council nor the Hertfordshire County Council, the local highways authority, objects to the proposed development, either on an individual or cumulative basis. This has been reaffirmed during the inquiry.⁵⁵ The objections by third parties are without merit and provide no good reason to take a different view to the Council and County Council.

(1) Impact on the highway network

64. The proposed development will not give rise to a severe residual cumulative impact on the highway network either in isolation or in combination with the development on the northern appeal site.
65. Mr Jones has undertaken detailed modelling of the impact on the highway network on a worst case basis. This approach is robust and is not disputed by any party, including Keep Chiswell Green ("KCG"). Instead, the dispute is as to what form of mitigation is necessary.

⁵³ In particular the reasons for refusal do not allege conflict with Local Plan Policy 102 – which is out of date in any event (both by virtue of inconsistency with the NPPF and by virtue of NPPF para. 11(d) deeming it out of date).

⁵⁴ CD 3.12 at p. 30/PDF p. 33.

⁵⁵ ID21

66. Mr Jones explained his view that for the proposed development in isolation, the modal shift arising from the Travel Plan was sufficient mitigation, but for the developments in combination it would be necessary to introduce traffic signals at the double mini-roundabout. The County Council agrees with this analysis.⁵⁶
67. Mr Walpole accepted the principle of signalisation, subject to detailed design, but contested the efficacy of the Travel Plan. This objection cannot give rise to a refusal of planning permission, given the introduction of traffic signals is offered as a fallback (although it is not considered necessary).⁵⁷ But in any event, it is an objection which is unjustified. The Travel Plan proposes a 16% decrease in single occupancy vehicle movements.⁵⁸ This is agreed by the County Council to be realistic.⁵⁹ That 16% decrease is made up of two components. The first component is a 10% reduction in car driver mode share as a result of active travel improvements.⁶⁰ Mr Walpole agreed in XX that he did not contest that element and he agreed that it was realistic.⁶¹ The second component is a 6% increase in people working from home: more specifically, a shift from 9% to 15%. Mr Walpole contended that this was unrealistic, but that is wholly unsustainable, given on KCG's own evidence some 24% of people in Chiswell Green work from home.⁶² Given this, achieving the lesser figure of 15% is eminently realistic and achievable, as both Mr Jones and the County Council have concluded.
68. It follows that the impacts of the proposed development will be appropriately mitigated and there is no basis for concluding that the proposed development will give rise to a severe residual cumulative impact on the highway network.

⁵⁶ CD 3.17 – the Highways SOCG at [2.49], dealing with the southern appeal site in isolation; and ID 21, dealing with the southern and northern appeal sites together.

⁵⁷ For the avoidance of doubt, the Appellants' position is that if planning permission is granted for the proposed development in isolation, the traffic signals are not necessary. However, out of an abundance of caution, the Appellants offer signalisation in that event, if the Inspector deems it necessary.

⁵⁸ CD 2.10 – the Framework Travel Plan at Table 3 on p. 20/PDF p. 23.

⁵⁹ CD 3.17 – the Highways SOCG at [2.42] on p. 6/PDF p. 8.

⁶⁰ CD 3.17 – the Highways SOCG at [2.39] on p. 5/PDF p. 7.

⁶¹ It is also consistent with KCG's evidence on reasons for greater bus uptake – CD 2.1 at PDF p. 7 – 9% more likely to use a more frequent bus – see also PDF pp. 11 – 12, to the same effect.

⁶² CD 6.21 on PDF p. 4.

(2) Impact on highway safety

69. Only Mr Walpole has raised an objection on the basis of highway safety. That objection was narrow in scope and only related to the proposed shared pedestrian/cycle way on Chiswell Green Lane. Further, the objection was unfounded in multiple respects.
70. First, as Mr Walpole explained in XX, his analysis was based on the shared way being the only point of access. This was in error. There will be two points of access for all modes of travel into the southern appeal site at Chiswell Green Lane in addition to the access at Forge End and the pedestrian/cycle/emergency access at Long Fallow. Importantly, the most easterly of these access points (and thus the access point that is most likely to be used by school children walking from the centre of Chiswell Green) will be served by footways on both sides of Chiswell Green Lane, contrary to Mr Walpole's understanding.⁶³ From that access way, school children will be able to follow the footway around the internal access road to the school site. In addition, there is likely to be an internal footpath across the northern part of the site, providing a further alternative access to the school site.⁶⁴
71. Secondly, the proposed shared way has been assessed in the Road Safety Audit and Mr Walpole's concerns were not corroborated.⁶⁵ This is consistent with the conclusion of the County Council who also found the shared way to be acceptable.⁶⁶
72. Thirdly, and in any event, the proposed shared way has been designed in accordance with LTN1/20 and it will have a capacity of 300 pedestrians/cyclists per hour. This will be more than adequate, as Mr Jones explained in XiC, in particular when the unchallenged forecasts only identify 40 cycling trips per day on that route.
73. It follows that the proposed development is acceptable in terms of highway safety.

⁶³ CD 1.22

⁶⁴ See CD 2.27, read together with CD 1.22 (see the annotation 'proposed footway avoids existing trees').

⁶⁵ CD 3.26 - Mr Jones' RPOE at Apx B, PDF p. 43 ff. Importantly, contrary to Mr Walpole's speculation in XX, the highways engineer undertaking the RSA was provided with details of pedestrian flows, as is apparent from the RSA at Appendix A and as Mr Jones confirmed in XiC in any event.

⁶⁶ CD 3.17 - the SOCG at [2.55] - [2.56] on pp. 7 - 9, PDF pp. 9 - 10.

(3) The locational accessibility of the proposed development

74. The issue of locational sustainability must be put in perspective. The Council has consistently assessed Chiswell Green as an appropriate location for development, both in the adopted local plan and in the aborted replacement local plan.⁶⁷
75. The first difficulty with Mr Walpole's evidence was his erroneous approach to national policy. Mr Walpole assessed locational sustainability on the basis that walking, cycling and public transport had to be *'the first choice for journeys by new residents'*.⁶⁸ This is incorrect. Mr Walpole based this test on a Government policy paper from July 2020. That policy paper predates the NPPF. Given this, it cannot be taken as an expression of the Government's current approach to assessing the locational accessibility of developments; rather, that should be assessed by reference to the NPPF, in its current form.
76. Properly understood, the NPPF requires opportunities to promote walking, cycling and public transport use are *'identified and pursued'*;⁶⁹ and it seeks to ensure that *'appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location'*.⁷⁰ Further, the NPPF recognises that opportunities to maximise sustainable transport solutions will vary depending on the location of the development.⁷¹
77. Mr Walpole did not recognise the contextual judgement that the NPPF requires. Instead Mr Walpole formulated arbitrary lists of required facilities, for which there is no policy or guidance support.⁷²
78. The second difficulty with Mr Walpole's evidence was that he assessed the accessibility of the development on foot by the rigid application of an 800m walking distance.⁷³ This approach is flatly contrary to the relevant guidance. Manual For Streets recognises that whilst 800m represents a *'comfortable'* walking distance, it is not an upper limit and that walking is a realistic option to replace car trips at distances up

⁶⁷ CD 8.2 – at p. 21/PDF p. 23. Compare CD 8.1 at p. 13. The settlement is Tier 2 in both instances.

⁶⁸ For example – CD 6.12 – Mr Walpole's POE at [4.2] on p. 8/PDF p. 10.

⁶⁹ CD 7.1 – NPPF at para. 104(c).

⁷⁰ CD 7.1 – NPPF at para. 110(a).

⁷¹ CD 7.1 – NPPF at para. 105.

⁷² CD 6.12 – Mr Walpole POE at [4.3] on p. 8/PDF p. 10.

⁷³ For example – CD 6.12 at [4.8] – [4.9] on p. 9/PDF p. 11.

to 2 km.⁷⁴ This is also consistent with the WYG research which found that walking up to 1.95 km was realistic as a main mode of travel outside of London.⁷⁵ Further, the National Design Guide does not lead to a different conclusion: that discusses how new developments can be laid out so as to be walkable (based on an 800m distance), but it does not dictate or provide guidance on the location of development relative to existing facilities. Mr Walpole did not appreciate this in his evidence.

79. The third difficulty was that Mr Walpole failed to consider the full range of sustainable transport options. In particular, Mr Walpole made no reference at all to the possibility of train travel, despite the appeal site being in close proximity to four train stations, offering the possibility to travel to central London in under an hour by bus and train alone.⁷⁶
80. Given these obvious errors in Mr Walpole's analysis, the Appellants submit that Mr Jones' evidence should be preferred. As he explained, Chiswell Green is served by a good range of facilities, including retail and employment, that are within convenient walking and cycling distance of the southern appeal site. Further, Chiswell Green is well located for the wider use of sustainable transport, in particular by cycle or bus into St Albans or the one of the four nearby rail stations, with plentiful opportunities for onward travel, especially to London and Watford. In short, applying the NPPF, it is clear that appropriate opportunities for sustainable transport exist and can be taken up. Mr Walpole was unable to identify any opportunities that had been overlooked.
81. It follows that the southern appeal site is in a sustainable location.

VI. THE EFFECT ON EDUCATION (MAIN ISSUE 6)

82. The Council do not dispute that the provision of the school land is a benefit, but instead they contest the weight to be given to it as a benefit. Mr Connell agreed that if planning permission is granted for both the northern and southern developments, then substantial weight should be afforded to the provision of the school land. Accordingly, the dispute is narrow, namely the weight to be afforded to the school land if planning permission is granted for the southern appeal site alone.

⁷⁴ CD 7.16 at [4.4.1] on p. 45.

⁷⁵ CD 3.26 – Mr Jones RPOE at PDF p. 23.

⁷⁶ Mr Jones XiC.

83. The starting point is to recognise that both the Council (and the County Council) consider that the obligation to provide the school land complies with reg. 122 of the Community Infrastructure Levy Regulations 2010. It follows that the Council (and the County Council) has concluded that the provision of the school land is necessary to make the development acceptable in planning terms. The Appellants agree.
84. Mr Connell's evidence – and the XX of Mr Kenworthy – must be seen in this context. The more that the Council suggested the delivery of the school land was uncertain, the further it strayed from the agreed position that the school land was necessary. Ultimately, it became clear that the Council's position was a contrived attempt to avoid giving the provision of a school land substantial weight, consistently with Mr Kenworthy's evidence and the officer's report.
85. The Appellants submit that substantial weight should be afforded to the provision of the school land for the following reasons.
86. First, there is no dispute that the school land is required. The SOCG with the County Council states so in terms.⁷⁷ More than that, the school land is the ideal response to that requirement. As Mr Hunter explained in his evidence, the school site is a rare opportunity because school land is not easy to come by, especially unencumbered, remediated and of an appropriate size without the need for compulsory purchase.⁷⁸
87. Secondly, following discussions with the County Council, the description of development was amended to allow the County Council the maximum flexibility when bringing forward the school land, in particular to allow the County Council to develop the school land for a SEND school (either alone or in combination with primary provision). This is important because there is a significant unmet need for school places for children with profound neurological impairments (“**PNI**”) and the school land will provide the County Council with the opportunity to address that need.
88. Mr Connell has sought to contest this analysis. He was wrong to do so in multiple respects.

⁷⁷ CD 3.16 – Education SOCG at [2.8] on p. 3/PDF p. 4.

⁷⁸ CD 3.21(a) – Mr Hunter's POE at [4.32] on p. 23

- (a) The County Council's Statement of Case is clear: there is a shortfall in places for children with both PNI and Severe Learning Difficulties ("SLD"), but the County Council only has a plan to accommodate the SLD need.⁷⁹ The County Council does not have a plan to accommodate PNI. There is no contrary evidence and Mr Connell was not able to point to any before the inquiry.
- (b) The email correspondence between Mr Hunter and Mr Wells in January 2023 does not alter this analysis.⁸⁰ Mr Wells email deals only (and specifically) with SLD needs. Mr Wells does not deal with PNI. Further, contrary to XX of Mr Hunter, there is nothing in the fact that Mr Hunter did not ask about PNI specifically because the County Council only disclosed that need to the Appellants in its subsequent statement of case, in February 2023.
- (c) Similarly, the email to the case officer from the County Council in March 2023 does not alter the analysis.⁸¹ Again, the only pertinent information in that correspondence is concerned with SLD provision (and specifically the size of school required). That email does not deal with PNI. Further and importantly, as Mr Hunter has explained in his evidence, the school land is big enough for a PNI school (or PNI provision in combination with primary provision).
- (d) The remaining straw to which the Council clutched on this point, in cross-examination of Mr Hunter and in closing submissions at para. 145, is the fact that the County Council has indicated a feasibility study would be needed prior it going ahead with a PNI school onn the site. However, Mr Hunter explained in XX and RX that there is nothing unusual about that: the requirement for a feasibility study is standard process. His expert opinion was that there were no foreseeable or likely showstoppers that would arise out of any such feasbilty study in future. He was the only education expert who appeared before the inquiry; there is no evidential basis in support of a different analysis. His evidence was obviously credible and well informed. The fact that no issues had arisen out of the feasbilty study already undertaken for a primary school underscores the confidence that can be had in his judgment in this respect.

⁷⁹ CD 2.41a - the County Council's SOC at [7.6] on p. 28/PDF p. 29.

⁸⁰ CD 5.25 - Email correspondence

⁸¹ CD 5.31 - Email correspondence, purportedly from 20 March 2023.

89. It follows that all the available evidence before this inquiry shows that there is an unmet need for school places for children with PNI and the school land is suitable to accommodate that need.
90. Thirdly, although it is theoretically possible to conceive of meeting the need for school places in a different way, the use of the school land is very obviously the best – and thus most likely – solution. Enabling it is markedly advantageous in planning terms. More particularly:
- (a) If planning permission is granted for both the north and the south sites, it is inconceivable that the County Council would seek to expand Killigrew Primary School to a 4FE. As Mr Hunter explained, there are no 4FE primary schools in Hertfordshire and such schools form less than 1% of the school stock across the country. Such an approach is so rare that DfE does not have baseline designs for 4FE. There is an obvious reason for this, given the qualitative benefits of smaller schools. Mr Connell accepted in XX that if permission is granted for both sites, an immediate need for the new school would arise and that substantial weight should in that situation be accorded to this benefit.
 - (b) There is insufficient surplus space at Killigrew Primary School to accommodate the pupil yield from the southern appeal site alone. The small (but insufficiently large) surplus that currently exists is necessary to ensure the smooth operation of the school, as Mr Hunter explained in XX. It is possible that the existing school could be expanded by 1FE to accommodate the need from the southern appeal site alone, but this is unlikely given: (1) 98% of the primary schools in Hertfordshire are 2FE; and (2) the requirement identified by the County Council is for a 2FE school, not for a 1FE extension.⁸² In XX the Council appeared to suggest that expansion to a 3FE school would build resilience, but this point goes nowhere, given the County Council has not raised any concern about the resilience of the existing school and the current levels of up take indicate that it is well used.
 - (c) Given these matters, the most likely approach is that the County Council will draw down the primary school land, at the very least to deliver a 1FE school, with the ability to expand that in future, given the likelihood of future

⁸² CD 2.41a at [5.2] on p. 19/PDF p. 20, final sentence.

development in Chiswell Green (having regard to the extent of need, the ability of urban sites to meet only 14% of the need, and Chiswell Green's comparative sustainability relative to much of the District).

(d) Ultimately, there are four possible options: (1) the County Council do not draw down the school land; (2) a primary school is constructed; (3) a SEND school is constructed; or (4) a primary school with SEND provision is constructed. The least likely of these four options is the first, given the County Council's stated requirement for the land; the unmet need for PNI school places; and the low likelihood of an alternative solution.

91. Fourthly, paragraph 95 of the NPPF requires local planning authorities to take '*a proactive, positive and collaborative approach*' to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. Further, local planning authorities are required to take the same approach '*to development that will widen the choice in education*'. The approach of Mr Connell and that put to Mr Kenworthy in XX is inconsistent with this clear policy. On the Council's approach, local planning authorities should sit around until schools are at capacity and there are no other options before recognising the importance of new school delivery. This is wrong. A proactive approach is that proposed by the Appellants: delivering a school now, with capacity for the southern appeal site and future growth in Chiswell Green. In addition, this approach will widen the choice in education, providing an alternative to the existing primary school (indeed, an alternative which KCG appeared to consider would be at least, if not more, attractive).

92. It follows that the provision of the school land is a benefit of the proposed development to which substantial weight should be afforded, consistently with the officer's report. (This is equivalent on the parties' weight scales to the "*great weight*" provided for by NPPF para. 95(a)).

VII. OTHER MATTERS

93. KCG and third parties have raised a number of other matters, outside of the reasons for refusal. The Appellants have responded to those matters through their evidence. Further, in XX Ms St Ledger McCarthy accepted that KCG had not presented evidence on the other matters raised in its SOC and/or that those matters did not give rise to a basis for refusing to grant planning permission.

94. Notwithstanding this, given the volume of representations made on the issue of precedent, it is necessary to deal with it briefly. The grant of planning permission will not give rise to any precedent. KCG's evidence has concentrated on Colney Heath. That is entirely irrelevant to precedent in this case. In addition, KCG's evidence about Chiswell Green has focussed on the potential for further applications to be made; not for further grants of planning permission. Further, it was based on the mistaken understanding that the grant of planning permission in this appeal would alter the Green Belt boundary and/or lessen the policy protection for land within the Green Belt.
95. In short, there is no evidence that the grant of planning permission in this case would render it more difficult for the Council to refuse to grant planning permission on another site. The absence of such evidence is readily explicable: the test of very special circumstances is inherently fact sensitive and thus not readily amenable – if at all – to arguments based on precedent. Further, the Council's own conduct – with different recommendations on each development – demonstrates the lack of any precedent, with the Council considering each site independently.
96. Accordingly, the representations based on precedent are nothing more than a generalised fear or concern. That is insufficient to found a precedent argument and it should be dismissed.

VIII. VERY SPECIAL CIRCUMSTANCES (MAIN ISSUE 7)

97. The Appellants accept that it is necessary to demonstrate very special circumstances in order to justify the grant of planning permission. Those circumstances exist here. Of all the cases for development in the Green Belt, this could not be stronger: the harm is limited and is clearly outweighed by a package of very significant benefits.

(1) Components of harm to be weighed in the balance

98. As to the harm arising from the proposed development, there are only three components.
99. First, the harm to the Green Belt. Mr Connell clarified in XX that he attributed a single value to this harm and treated it as a single factor (not multiple factors with the potential for double counting, as the SOCG suggested). That harm is to be afforded

substantial weight, consistently with the NPPF, as the parties have both identified.⁸³ For the reasons already explained, the Council is wrong to allege a greater scale of harm to the Green Belt, and in any event, the differences in the scale of harm are not material in this case, given the common ground that the harm is only that which is inevitable – the minimum harm, not justifying any increase in the weight, even on the Council’s approach.

100. Secondly, there is an agreed position on the harm to landscape character: this is limited in scale and should be attributed limited weight. This too is accepted to be the minimum inevitable for a development of this scale.⁸⁴
101. Thirdly and similarly, there is an agreed position on the loss of agricultural land: at most, this is limited in scale and should be attributed limited weight. This too is accepted to be the minimum inevitable for a development of this scale.⁸⁵
102. Overall, therefore, on the evidence of the Council’s own witnesses at this inquiry, the “harm to the Green Belt and any other harm” for the purposes of NPPF para. 148 is the minimum possible harm for a Green Belt development of this scale in the District- in the context that such developments need to come forward and there should be no moratorium pending the new local plan. **The substantial package of benefits which the appeal scheme would deliver comes at the lost possible cost to the Green Belt.**

(2) Benefits to be weighed in the balance

103. We now turn to that substantial package of benefits.
104. First, the Council and the Appellants are agreed that very substantial weight should be given to the delivery of market housing. This is consistent with the Inspector’s conclusion in the Roundhouse Farm appeal (on a materially smaller scheme, but in the same District, with the same chronic housing delivery issues).⁸⁶
105. Secondly, there is agreement that delivery of affordable homes should also attract very substantial weight.

⁸³ CD 3.12 at p. 30.

⁸⁴ Friend XX.

⁸⁵ Connell XX.

⁸⁶ CD 9.2 at DL 49.

106. Thirdly, there is agreement that the delivery of self-build and custom-build homes should attract substantial weight.
107. Fourthly, for the reasons already explained, the Appellants' position on the school land should be preferred and this should be afforded substantial weight.
108. Fifthly, it is agreed that the provision of open space and children's play space is a benefit, but there is a dispute as to the weight to be afforded to this delivery. The Council seeks to justify a lesser weighting on the basis that there is no identified deficiency. This is perverse. An identified deficiency is a factor that might increase the weight to be afforded to this benefit, but it is not a necessary precondition. The nature, quality and quantity of the provision must be assessed in its own right, as Mr Kenworthy did. On this basis, he concluded that the new provision was larger than that required by policy and represented an improvement because it integrated the open and play space into the development, allowing "doorstep" provision for the local community to use which is an improvement over the existing situation. Mr Kenworthy also highlighted that the local community would also be able to secure new bridleway access through the site to gain easier access to PROW beyond. This improvement in the baseline position and the overall quality of the development as a result justifies moderate weight, as the Council's officers also concluded.
109. Sixthly, the provision of ecological improvements is a benefit to which moderate weight should be afforded. Mr Connell struggled to give this any weight, seemingly on the basis that he thought it was a policy requirement. This is wrong in multiple respects. The policy requirement is that found in the NPPF which does not specify a target percentage. A 1% uplift would suffice. Accordingly, when, as here a greater uplift is provided, that should be attributed greater weight. The fact that this may be mandatory in the future does not change the analysis: as at the date of determination, the policy requirement is being exceeded. In any event, as a matter of principle, the fact that the policy requirement is met is not a reason to reduce its weight. Affordable housing is a prime example: no reduction is made because "only" a policy compliant level is provided. So too with ecological improvements: weight should be attributed based on the quality of the provision, without reduction for it being policy compliant. Similarly, the fact that some of the provision is off site does not reduce the weight: the off site provision is permissible under both current and emerging policy, and the off site provision is within the District or within the same Northern Thames Basin

National Character Area within Hertfordshire. It follows that at least moderate weight should be attributed to this benefit.

110. Seventhly, the socio economic benefits of the proposed development are significant. The Council accepts that this is a benefit, but seeks to contest the weight to be afforded to it, despite no issue being taken with this aspect in the Reason for Refusal.
111. The BWNS analysis in this respect has not been disputed. The proposed development will give rise to 214 direct jobs and 207 indirect jobs during construction with a combined GVA during construction of £114.6 million.⁸⁷ Following occupation, the GVA from the residents will amount to £25.5m *per year* with an additional £10.9m *per year* of commercial expenditure. This leaves out of account the council tax and new homes bonus (and therefore the Council's arguments about these latter two items are *de minimis* in the overall conclusion - even they are left out of account, that does not alter the order of magnitude of the economic benefits or the weight to be afforded to them). Further, the fact that some of this spend might not be within the District does not alter the weight to be afforded to it. These benefits are not to be assessed on a parochial basis: they are economic benefits to be realised. It follows that even looked at in isolation, divorced from the policy framework, the socio economic benefits justify substantial weight, as the Council's officers concluded.
112. This analysis is also consistent with paragraph 81 of the NPPF which mandates that significant weight to be given to the need to support economic growth and productivity (irrespective of whether that support is at a local or national level and irrespective of whether it is permanent or temporary). The appeal scheme would, as Mr Connell accepted in XX, support economic growth and productivity and accordingly significant weight flows automatically from NPPF para. 81 to these benefits. There are a string of recent appeal decisions which confirm this approach, all considering considerably lesser schemes.⁸⁸ The Council has pointed to other appeal decisions but these do not assist because in none of them has the Inspector grappled with (or referred to) paragraph 81 of the NPPF, and most of them pre-date the appeal decisions upon which the Appellant relies. It follows that the Appellants' analysis is to be preferred.

⁸⁷ CD 2.7 - Socio Economic analysis - Table 6.1 on p. 34/PDF p. 38.

⁸⁸ CD 9.12 at DL 149 - 152. CD 9.10 at DL 95. CD 9.24 at DL 70.

113. Eighthly, as already explained, the development of the southern appeal site will improve the urban edge by incorporating substantial planting, assisting in the creation of a strong Green Belt boundary and giving rise to positive effects both on the Green Belt and the character and appearance of the area. This is a matter to which significant weight should be afforded in accordance with para. 134 of the NPPF.

(3) The very special circumstances balance

114. Before turning to the balance, there are two important preliminary considerations.

115. First, the Council founds its judgment on the assertion that, as Mr Parkinson put it in Opening: *‘There is nothing “very special” about the circumstances of either case’*.⁸⁹ This approach is wrong as a matter of principle and law.⁹⁰ The question is not whether the individual circumstances are *“very special”*; rather the question is whether, cumulatively, the benefits clearly outweigh the harms. If this is so, then very special circumstances have been demonstrated, even if on an individual basis, the benefits were to be considered unremarkable (which in any case they are not).

116. Secondly, the difference in the parties’ positions is small. Mr Connell explained in XX that in his view it was *“very finely balanced”* as to whether very special circumstances exist in this case. He then accepted that the proposed development only failed to demonstrate very special circumstances by a very fine margin. Consistently, with this, Mr Connell accepted that if the officer’s weightings were adopted, then very special circumstances would be demonstrated. Accordingly, only a very small number of changes to Mr Connell’s weightings are required before the benefits clearly outweigh the harms and very special circumstances are demonstrated *even on the Council’s own case*.

117. Thirdly, even on Mr Connell’s weightings, the clear and obvious conclusion is that very special circumstances have been demonstrated. Critical to this consideration are, first, the cumulative force of the weightings he has ascribed to the various benefits, and secondly – and fundamentally, his (and in the absence of any RX on these points the Council’s) acceptance that (a) the only harm the appeal scheme would cause would be the inevitable harm of building 391 homes and a new school on a greenfield Green

⁸⁹ Paragraph 35. See also paras. 9 and 129 (last sentence) of the Council’s closing submissions.

⁹⁰ CD 10.15 – the *Wychavon* case in the Court of Appeal [2008] EWCA Civ 692 per Carnwath LJ (as he then was) at [26].

Belt site in St Albans (b) some greenfield Green Belt sites will necessarily have to be developed to meet housing and education needs (given the vast difference between the extent of needs and the identified urban capacity) and (c) that there should not be a moratorium on meeting needs in the Green Belt pending the adoption of a new emerging plan at some indeterminate point in the future. **These three points are necessarily fatal to the Council's case.**

118. There is a hint of a previously unpleaded precedent argument at para. 9 of the Council's closing submissions, where reference is made to the risk of the death of the Green Belt by "a thousand cuts". In fact, the precedent risk in relation to the south site and appeal scheme runs the other way. If a VSC case cannot be made out in relation to a development which is agreed to cause the minimum inevitable "harm to the Green Belt and any other harm" for a development of this scale, which is top-ranked in the Green Belt review, then what prospect is there for VSC to be made out anywhere else? The consequences of dismissing this appeal would be in practice to bring about the very moratorium on pre-Local Plan Green Belt permissions that the Council has explicitly disavowed in evidence.
119. Overall, and having regard to the foregoing matters, the Appellants submit that the benefits of the proposed development are compelling, as officers recognised, and that as a package, the harm arising from the proposed development is clearly outweighed. It follows that very special circumstances exist.⁹¹ Once this hurdle has been cleared, the Council accepts that there is accordance with the development plan read as a whole, the proposed development benefits from the tilted balance in NPPF para. 11(d)(ii) and planning permission should be granted.

IX. CONCLUSION

120. For these reasons, the appeal should be allowed.

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⁹¹ Sought by paragraphs 148 of the NPPF, Policy 1 of the adopted Local Plan and Policy S1 of the St Stephen Neighbourhood Plan

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9th May 2023



St Albans City and District

Authority's Monitoring Report 2023

**Four Year Housing Land Supply Position and
Housing Trajectory**

(1 April 2023)

Four year land supply (estimated dwelling numbers)

- 1.1 The government published a revised version of the National Planning Policy Framework (NPPF) in December 2023. It introduced a new requirement for some local planning authorities to annually identify and update a four year housing land supply position, applying for two years from the revised Framework's publication. Paragraphs 77 and 226 of the NPPF 2023 state that this requirement applies to certain authorities which have an emerging Local Plan that has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage (including both a policies map and proposed allocations towards meeting housing need). St Albans City and District Council (SADC) published its emerging new draft Local Plan 2041 (which included both a policies map and proposed site allocations towards meeting housing need) for a Regulation 18 Consultation, held between 12 July and 25 September 2023. Therefore, the Council considers that the annual requirement to identify and update a four year housing land supply position (with a buffer, if applicable, as set out in NPPF 2023 paragraph 77) applies for decision-making purposes only. In accordance with NPPF 2023 paragraph 226, the annual four year housing land supply position will be provided against local housing need calculated using the standard method set out in national planning guidance. This is because the current adopted strategic policies from the saved policies of the District Local Plan Review 1994 are over five years old.
- 1.2 Previous Authority's Monitoring Reports (AMRs) followed the former policy requirement in past versions of the NPPF (revised in 2018, 2019, 2021 and September 2023) for all authorities to annually identify and update a five year housing land supply position. This AMR follows the most recent policy requirement in the NPPF 2023 for certain authorities to provide an annual four year housing land supply position, as the requirement for all authorities to provide an annual five year housing land supply position has been superseded.
- 1.3 There is no definitive Development Plan housing target/requirement for the District. Therefore, a judgment will need to be reached as to what is the most appropriate target/requirement to use as a basis for assessment of housing land supply, taking account of the NPPF 2023.
- 1.4 In a Court of Appeal Decision regarding Sewell Park, St Albans, on 12 December 2013 (Hunston), the judges have set out in the absence of a Development Plan figure the decision taker must use "the most up-to-date figures" for "full objectively assessed needs" on which to base 4 year housing land supply calculations (this should now be related to NPPF 2023 paragraph 11, which refers to 'objectively assessed needs' as well as paragraphs 61 and 77 which refer to 'local housing need').
- 1.5 The standard method for assessing local housing need is set out in Planning Practice Guidance on 'Housing and economic needs assessment', updated in December 2020. It involves applying a formula consisting of four steps. First, 2014 based household projection figures are used to calculate average annual household growth in the District over the ten year period from 2023 to 2033 (634 dwellings) as the set baseline. Second, the most recent District median workplace-based affordability ratio for 2022 (18.44) is applied as an adjustment to take account of affordability. Third, a cap of 40% above the projected annual average household growth for the District over the ten year period 2023-2033 in step one is applied to limit the level of any



increase the authority faces. Fourth, a 35% uplift is then applied for urban local authorities in the top 20 cities and urban centres list. The District is not included in the urban local authorities in the top 20 cities and urban centres list, therefore step 4 does not apply to SADC. Using these inputs, the standard method gives an outcome for the District of an average of **888 new households / dwellings per annum**.

- 1.6 The Council has not taken a decision on whether or not this or any other figures may more accurately represent “local housing need”, and wholly reserves its position on this point. The Council takes the view that this matter is properly to be decided as part of the decision making process on its emerging new draft Local Plan.
- 1.7 NPPF 2023 paragraphs 77, 79 and 80 set out that ‘Housing Delivery Test’ (HDT) results will be applied each year for plan-making authorities. The HDT is a percentage measurement of the number of net homes delivered against the number of homes required by the HDT, over a three year period.
- 1.8 Results from the 2022 Housing Delivery Test for SADC (published in December 2023) indicated a HDT measurement of 55%. This result was calculated for the period 2019/20 to 2021/22, with 1,273 net homes delivered against the HDT housing requirement of 2,307 dwellings. As housing delivery for the District was below 75% of the Government’s new assessed housing requirement, at this time a 20% buffer as set out in NPPF 2023 paragraph 79c has been applied to the Council’s 4 year housing land supply calculation. In accordance with NPPF 2023 paragraph 79c, the Council will prepare the St Albans Housing Delivery Test Action Plan 2024. The HDT Action Plan will analyse the key reasons for historic under-performance against the Government’s new assessed housing requirement and identify measures the Council intends to undertake to increase/maintain the delivery of new housing in the District.
- 1.9 The Council has updated its 4 year housing land supply schedule and considers that, at a baseline date of 1 April 2023 and including the relevant 20% buffer, there is approximately:
- 4 year housing land supply at 1,066 Dwellings Per Annum (888 Dwellings per Annum + 20% Buffer) at 1 April 2023: 1.7 years supply (42.5% of housing land supply requirement + 20% Buffer)**
- 1.10 This baseline figure looks forward in time only. There is no definitive approach to or timeframe over which any “surplus” or “shortfall” in past delivery should be measured. Therefore, the Council cannot demonstrate a 4 year housing land supply as set out in NPPF 2023 paragraphs 77 and 226. Paragraph 11 of the NPPF 2023 is therefore engaged.
- 1.11 Details of the currently anticipated housing trajectory that makes up the housing land supply position from 2023/24 to 2040/41 is set out below, and in further detail at Appendix 1 – Housing Trajectory Schedule.



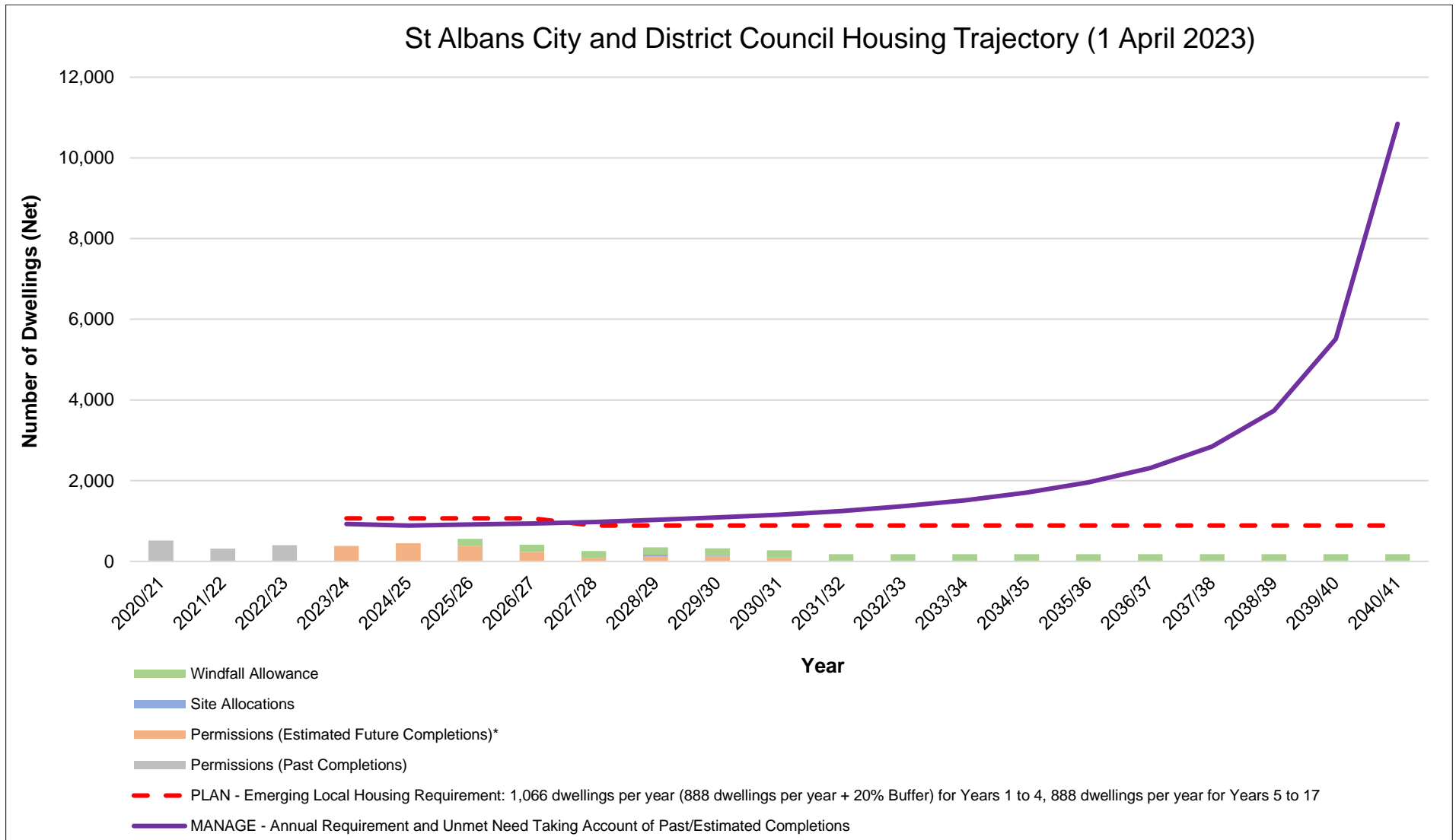
Table 1: Housing Trajectory Data (1 April 2023)

Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Total	
Permissions (Past Completions)	516	314	401																			1,231	
Total Estimated Future Completions (Permissions, Site Allocations & Windfall Allowance)*				381	450	556	415	258	346	320	274	180	180	180	180	180	180	180	180	180	180	4,799	
Cumulative Completions (Total Past & Estimated Future Completions)				1,612	2,062	2,617	3,032	3,290	3,636	3,956	4,230	4,410	4,590	4,770	4,950	5,130	5,310	5,490	5,670	5,850	6,030	6,030	
PLAN - Emerging Local Housing Requirement: 1,066 dwellings per year (888 dwellings per year + 20% Buffer) for Years 1 to 4, 888 dwellings per year for Years 5 to 17				1,066	1,066	1,066	1,066	888	888	888	888	888	888	888	888	888	888	888	888	888	888	888	16,696
MONITOR - Number of Dwellings Above or Below the Cumulative Requirement				546	-71	-581	-1,232	-1,862	-2,404	-2,972	-3,586	-4,294	-5,002	-5,710	-6,418	-7,126	-7,834	-8,542	-9,250	-9,958	-10,666	-10,666	
MANAGE - Annual Requirement and Unmet Need Taking Account of Past/Estimated Completions				928	887	915	939	976	1,031	1,088	1,158	1,247	1,365	1,513	1,704	1,958	2,313	2,847	3,735	5,513	10,846	2,276	

*Includes 5% discount on un-started permissions for small sites (1 to 4 dwellings)



Figure 1: Chart of Housing Trajectory (1 April 2023)



*Includes 5% discount on un-started permissions for small sites (1 to 4 dwellings)



Appendix 1

Housing Trajectory Schedule

1. This document contains a housing trajectory with a base date of 1 April 2023. Estimates of future housing supply are detailed from 2023/24 onwards until 2040/41.
2. Estimates of the dates for future completions have been made for:
 - Permissions (estimated future completions)
 - Site allocations (remaining allocated housing sites in the made Harpenden Neighbourhood Plan 2019)
 - Windfall allowance
3. In the schedule at the end of this appendix, each site is placed in one of the following categories, depending on which stage it has reached in the planning process:
 1. Permissions (past completions and estimated future completions)
 2. Site allocations

The schedule lists all sites included in the housing trajectory and four year housing land supply.

Figure 2: SADC Total 4 Year Housing Land Supply at 1 April 2023

Total 4 year housing land supply at 1 April 2023 (From period 2023/24 to 2026/27)	1,802 net dwellings
Total 4 year housing land supply at 1 April 2023 at 1,066 dwellings per annum (888 dwellings per annum + 20% Buffer) (From period 2023/24 to 2026/27)	1.7 years



Figure 3: Housing Trajectory 1 April 2023

St Albans City and District Council Housing Trajectory (1 April 2023)

Year	Past Completions			4 Year Housing Land Supply																	Total	
	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40		2040/41
Permissions (Past Completions)	516	314	401																			1,231
Permissions (Estimated Future Completions)*				381	450	376	235	78	128	125	90											1,862
Site Allocations									38	15	4											57
Windfall Allowance						180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	2,880
Total	516	314	401	381	450	556	415	258	346	320	274	180	180	180	180	180	180	180	180	180	180	6,030

*Includes 5% discount on un-started permissions for small sites (1 to 4 dwellings)



Figure 4: Housing Trajectory Schedule 1 April 2023

Permissions (Past Completions and Estimated Future Completions)

Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2013/2589 5/2018/1303 5/2019/1291	Oaklands College, Smallford Campus, Hatfield Road, St Albans	389		361	28	119	28																		Permission 5/2013/2589 allowed on appeal. Total of 389 dwellings includes additional 8 studio flats (Use Class C3) and 83 C1 student accommodation bedrooms (C3 dwellings equivalent = 33 dwellings). Conversion ratio of 2.5 (Housing Delivery Test Measurement Rule Book) applied to 83 C1 student accommodation bedrooms (83 / 2.5 = 33 [nearest whole number]).
5/2021/1035 5/2015/0990	Land At Harperbury Hospital, Harper Lane (Kingsley Green)	207		189	18	35	18																		Permission 5/2015/0990 partially superseded by permission 5/2021/1035 for 1 additional net dwelling.



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2016/2845	Land at Three Cherry Trees Lane and Cherry Tree Lane (Spencer's Park Phase 2), near Hemel Hempstead	160		0	160	0						55	55	50											Site forms part of Hemel Garden Communities.
5/2021/0423	Land To Rear Of 112-156B Harpenden Road, St Albans	150		0	150	0						55	55	40											
5/2020/2501 5/2019/2013 5/2019/1343 5/2019/1342 5/2018/2385 5/2018/2118 5/2014/3250	Former HSBC Training Centre, Smug Oak Lane, Bricket Wood	140		132	8	47	8																		Site includes 3 permissions, permissions 5/2019/2013 and 5/2018/2118 for 129 dwellings and permission 5/2020/2501 for 10 additional dwellings. Outline permission 5/2014/3250 allowed on appeal.
5/2018/2525 5/2016/3422 5/2015/2726 5/2015/0408 5/2014/3337	Ziggurat House, Grosvenor Road, St Albans	130		130	0	5																			Site includes 2 permissions, permission 5/2016/3422 for 125 dwellings and permission 5/2018/2525 for 5 additional dwellings.
5/2020/3022	Land To Rear Of Burston Garden Centre, North Orbital Road, Chiswell Green	124		0	124	0			55	55	14														Conversion ratio of 1.8 applied to 227 C2 bedrooms (Housing Delivery Test Measurement Rule Book). C3 dwellings equivalent = 126



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
																									dwellings (227 / 1.8 = 1 [nearest whole number]). Permission 5/2020/3022 allowed at appeal.
5/2019/3164 5/2018/0095	The Old Electricity Works, Campfield Road, St Albans	107		0	107	0		55	52																Permission 5/2019/3164 supersedes permission 5/2018/0095. Permission 5/2019/3164 allowed at appeal.
5/2017/1550	Building Research Establishment (north & north east areas), Bucknalls Lane, Bricket Wood	100		100	0	1																			
5/2020/1773 5/2018/1925 5/2017/1060	Civic Centre Opportunity Site (South), Victoria Street, St Albans	93		0	93	0	20	20	20	20	13														Site allocated for mixed use redevelopment in 1994 District Local Plan Review, Saved Policy 122 (Site Reference 2E). Permission 5/2020/1773 supersedes permissions 5/2018/1925 and 5/2017/1060.
5/2016/1153 5/1996/0917 5/1981/1171 5/1995/1560 5/1971/2318	Forge End, Nokeside, Chiswell Green	84		83	1	0																			Vacant plots to allow future access to land beyond. No further construction anticipated.



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative	
5/2017/1149	Ziggurat House (Car Park), Grosvenor Road, St Albans	74		0	74	0	20	20	20	14															Permission 5/2017/1149 allowed at appeal.	
5/2021/2417	Verulam Industrial Estate, London Road, St Albans	62		0	62	0		20	20	20	2															
5/2022/0337 5/2021/0724 5/2020/0606	Noke Lane Business Centre, Noke Lane, St Albans	46		0	46	0			15	15	15	1														Permission 5/2022/0337 supersedes permissions 5/2021/0724 and 5/2020/0606
5/2014/2136 5/2016/1647 5/2012/0987	270-274 London Road, St Albans	46	-3	0	43	0	-3	15	15	15	1															Conversion ratio of 1.8 applied to 83 C2 bedrooms (Housing Delivery Test Measurement Rule Book). C3 dwellings equivalent = 46 dwellings (83 / 1.8 = 46 [nearest whole number]). Permission allowed at appeal.
5/2022/0879 5/2020/1992	Land Between Bullens Green Lane And Roestock Lane, Colney Heath	45		0	45	0			15	15	15															Permission 5/2022/0879 supersedes permission 5/2020/1992. Outline permission 5/2020/1992 allowed at appeal. N.B. cross-boundary planning application at SADC and WHBC, 45



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
																									dwellings in SADC, 55 dwellings in WHBC.
5/2021/0611 5/2019/1799	Former London Colney Recreation Centre, Alexandra Road, London Colney	45		0	45	0		15	15	15															Permission 5/2021/0611 supersedes permission 5/2019/1799.
5/2020/1910	Ridgeview Lodge, Barnet Road, London Colney	44		0	44	0		15	15	14															
5/2022/2084 5/2018/2000	22-24 Grove Road (Pan Autos), Harpenden	39		0	39	0			15	15	9														Made Harpenden Neighbourhood Plan 2019, Policy H10 - Housing Site Allocations HA3 for minimum of 14 dwellings. Permission 5/2022/2084 supersedes permission 5/2018/2000.
5/2021/2195	Jewson Depot, Adjacent To 15 Cape Road, St Albans	37		0	37	0			15	15	7														Allocated for housing in 1994 District Local Plan Review, as supported by Saved Policy 4 (Site Reference RS.46).
5/2019/1642	Chelford House, Coldharbour Lane, Harpenden	35		0	35	0		15	15	5															Conversion ratio of 1.8 applied to 63 C2 bedrooms (Housing Delivery Test Measurement Rule Book). C3 dwellings equivalent = 35



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
																									dwellings (63 / 1.8 = 35 [nearest whole number]). Permission 5/2019/1642 allowed at appeal.
5/2021/1972	222 London Road, St Albans	32		0	32	0			15	15	2														Site likely to be redeveloped for housing over time, as supported by Saved Policy 122 of 1994 District Local Plan Review (Site Reference 8D).
5/2021/2730	Land off Orchard Drive, Park Street	30		0	30	0						15	15												
5/2020/3084 5/2018/1260	Land Between The River Lea & Palmerston Drive, Wheathampstead	28		8	20	8	15	5																	Permission 5/2020/3084 supersedes permission 5/2018/1260. Allocated for housing in 1994 District Local Plan Review, Saved Policy 5 (Site Reference RW.2).
5/2018/2806 5/2019/3240 5/2019/0955 5/2015/0644 5/2015/3428 5/2017/0634	Radio Casa, Oaklands Lane, Smallford	27	-9	18	0	20																			Permission 5/2018/2806 supersedes permissions 5/2019/3240, 5/2019/0955, 5/2015/0644, 5/2015/3428 and 5/2017/0634.



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/1435 5/2018/1867	York House, Guildford Road & 130 Ashley Road, St Albans	25		0	25	0	15	10																	Permission 5/2021/1435 supersedes permission 5/2018/1867
5/2019/1845 5/2018/0474	Former Westfield Allotment Site, Beeching Close, Harpenden	24		23	1	23	1																		Made Harpenden Neighbourhood Plan 2019, Policy H10 - Housing Site Allocations HA2 for minimum of 23 dwellings; 100% affordable housing.
5/2016/2422	Porters House, 4 Porters Wood, St Albans	21		15	6	0	6																		
5/2020/2978	67 St Peters Street, St Albans	20		0	20	0		15	5																
5/2020/0733 5/2017/3185 5/2017/3015	60 Victoria Street, St Albans	18		17	1	0	1																		Site includes three permissions, permission 5/2017/3015 for 9 dwellings, permission 5/2017/3185 for additional 8 dwellings and permission 5/2020/0733 for additional 1 dwelling.
5/2020/2142 5/2019/3099	61-65 St Peters Street, St Albans	18		0	18	0		15	3																Permission 5/2020/2142 supersedes permission 5/2019/3099. Permission 5/2019/3099 allowed on appeal.



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2022/0667 5/2021/2091 5/2020/0919	Land Between Hopkins Crescent And The Former Baptist Chapel, St Albans Road, Sandridge	15		0	15	0		15																	Site includes two permissions, permission 5/2022/0667 for 1 dwelling and permission 5/2021/2091 for 14 dwellings. Permissions 5/2021/2091 and 5/2022/0667 supersede permission 5/2020/0919.
5/2014/0063 5/2017/2878	Oak Court Business Centre, 14 Sandridge Park, Porters Wood, St Albans	14		7	7	0	7																		
5/2013/2153	1-8 Reed Place, Bloomfield Road, Harpenden	14	-8	-8	14	0	14																		
5/2016/3811 5/2015/2871	223a Hatfield Road, St Albans	14		0	14	0		14																	Permission 5/2016/3811 supersedes permission 5/2015/2871
5/2019/2656	Units 6 And 7 Batford Mill, Lower Luton Road, Harpenden	14		0	14	0		14																	
5/2021/1674	The King Offa PH and Norman Close, Wallingford Walk, St Albans	14		0	14	0		14																	
5/2021/2731	91 - 93 Victoria Street, St Albans	14		0	14	0		14																	
5/2021/3386	69 - 69a St Peters Street, St Albans	14		0	14	0		14																	
5/2020/2451	The Hedges, Woolam	12	-10	0	2	0	-10	12																	



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
	Crescent, St Albans																								
5/2012/1238	Highfield Oval, Ambrose Lane, Harpenden	11	-2	0	9	0	-2	11																	
5/2022/0091 5/2020/1545 5/2019/3189 5/2019/3064	117 Hatfield Road, St Albans	11	-4	0	7	0		-4	11																Permission 5/2022/0091 supersedes permissions 5/2020/1545, 5/2019/3189 and 5/2019/3064
5/2019/2365 5/2018/2594	Noke Shot Garages East, 35a and 35b Porters Hill, 46 Noke Shot and land rear of 38-40 Noke Shot, Harpenden	10	-2	-2	10	0	10																		Made Harpenden Neighbourhood Plan 2019, Policy H10 - Housing Site Allocations HA5 for minimum of 7 dwellings. Permission 5/2019/2365 supersedes permission 5/2018/2594.
5/2021/1933	271 High Street, London Colney	10		0	10	0		10																	
5/2019/0733 5/2016/1170 5/2013/2021	Station House, 2-6 Station Approach, Harpenden	9		0	9	0	9																		Permission 5/2019/0733 supersedes permissions 5/2016/1170 and 5/2013/2021
5/2021/3277 5/2018/1877 5/2016/3805	Land Rear of 103-105 St Peters Street, St Albans	9		9	0	9																			Permission 5/2021/3277 supersedes permissions 5/2018/1877 and 5/2016/3805
5/2019/2333	Queen Elizabeth The Queen Mother Centre,	9		0	9	0	9																		Permission 5/2019/2333 allowed at appeal



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/3616 5/2021/0346 5/2021/0402 5/2020/1667	Station Road, Bricket Wood Land adjacent to Winslo House, Radlett Road, Frogmore	9		0	9	0		9																	Permission 5/2021/3616 supersedes permissions 5/2021/0346, 5/2021/0402 and 5/2020/1667. Outline permission 5/2020/1667 allowed at appeal.
5/2021/2895	21 Salisbury Avenue, Harpenden	9		0	9	0	9																		
5/2020/0558 5/2016/2054 5/2015/1841	Searches Yard, Searches Farm, Searches Lane, Bedmond	8		0	8	0	8																		Site includes 2 permissions totalling 8 dwellings, permission 5/2020/0558 for 5 dwellings and permission 5/2016/2054 for 3 dwellings. Permissions 5/2020/0558 and 5/2016/2054 supersede permission 5/2015/1841.
5/2017/0916	Part Of Garage Block Between Hughenden Road And The Ridgeway, St Albans	8		0	8	0	8																		
5/2019/2322	Nicholas House, Cairns Close, St Albans	8		8	0	8																			
5/2019/2699 5/2018/2036	382 Hatfield Road, St Albans	8	-1	-1	8	0	8																		Permission 5/2019/2699 supersedes



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
																									permission 5/2018/2036
5/2019/3217 5/2020/0784	6 Adelaide Street, St Albans	8		0	8	0	8																		Permission 5/2019/3217 supersedes permission 5/2020/0784. Permission 5/2019/3217 allowed at appeal.
5/2020/2762	Victoria, Alexandra, Littleport and Collingham House, Southdown Road, Harpenden	8		0	8	0			8																Made Harpenden Neighbourhood Plan 2019, Policy H10 - Housing Site Allocations HA7 for minimum of 5 dwellings. Requirement to re-provide the same amount of employment floorspace as currently provided on site.
5/2021/2120 5/2019/2748	223 Hatfield Road, St Albans	8		0	8	0	8																		Permission 5/2021/2120 supersedes permission 5/2019/2748
5/2021/0028 5/2018/2657	Ground And Part First Floor, 114 Ashley Road, St Albans	7		7	0	2																			Site includes two permissions 5/2018/2657 for 5 dwellings and 5/2021/0028 for 2 dwellings
5/2019/1274	Former Sopwell Youth Centre, Cottonmill Lane, St Albans	7		7	0	7																			
5/2021/3438	Mitchell Hall, 85 Verulam Road, St Albans	7		0	7	0		7																	



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2009/1647 5/2007/1019	13+15 Penn Road & R/O Bluebell Close, How Wood	6	-2	4	0	0	-1	1																	Partially superseded by permission 5/2009/1647. Permission 5/2007/1019 allowed at appeal.
5/2020/2463 5/2019/2525	1 The Mansion and 3 St Peters Street, St Albans	6		0	6	0	6																		Permission 5/2020/2463 supersedes permission 5/2019/2525
5/2021/0280	Land r/o 76-80, Oakwood Road, Bricket Wood	6		0	6	0	6																		
5/2018/1049	16 Lower Luton Road, Harpenden	5	-1	4	0	5																			
5/2019/2921	32 White Horse Lane, London Colney	5	-1	4	0	5																			
5/2019/3061 5/2017/0014	52 Victoria Street, St Albans	5		0	5	0																			Permission 5/2019/3061 supersedes permission 5/2017/0014
5/2018/1655	Kennels, 1 Betts Cottages, Little Revel End Lane, Redbourn	5		0	5	0																			
5/2019/0719	Barn At Turners Hall Farm, Annables Lane, Kinsbourne Green	5		0	5	0	5																		
5/2021/0840 5/2019/3185	Mandeville Health Centre, Mandeville Drive, St Albans	5		5	0	5																			Permission 5/2021/0840 supersedes permission 5/2019/3185
5/2021/3364 5/2021/1359 5/2021/0042 5/2017/2981	Ivens Orchids, St Albans Road, Sandridge	5		0	5	0	5																		Permission 5/2021/3364 supersedes permissions 5/2021/1359, 5/2021/0042



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
																									and 5/2017/2981.
5/2022/2082 5/2020/0934	201 and land rear of 199 and 201 Hatfield Road, St Albans	5	-1	3	1	4	1																		Site includes two permissions, permission 5/2022/2082 for 1 dwelling and permission 5/2020/0934 for 4 dwellings
5/2021/2515	16 & 16a High Street, Harpenden	5		0	5	0	5																		
5/2022/1814 5/2021/3503	Old Apiary Site, Hatching Green, Harpenden	5		0	5	0		5																	Permission 5/2022/1814 supersedes permission 5/2021/3503
5/2019/2463	Land Rear Of Ardens Rise, House Lane, St Albans	5		5	0	5																			
5/2022/1534	Barley Mow Stables, Barley Mow Lane, St Albans	5		0	5	0		5																	
5/2022/1630	White Walls, Annables Lane, Kinsbourne Green, Harpenden	5		0	5	0		5																	
5/2021/3502 5/2022/1574	82 Oaklands Lane, St Albans	5	-1	-1	5	-1	5																		Permission 5/2021/3502 supersedes permission 5/2022/1574
5/2006/1586	62 & Land R/O 60 Mount Drive, Park Street	4	-1	3	0	2																			
5/2016/2810	Calverton House, 2 Harpenden Road, St Albans	4		1	3	0	3																		



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2019/1990 5/2016/2754	9, 11 And Land To Rear Of 7 Crossfields, St Albans	4	-2	0	2	1	-1	3																	Permission 5/2019/1990 supersedes permission 5/2016/2754
5/2020/0035 5/2018/3102	1a Netherway, St Albans	4	-1	3	0	4																			Permission 5/2020/0035 supersedes permission 5/2018/3102
5/2021/1594 5/2018/1689	Ayres End House, Ayres End Lane, Harpenden	4	-3	1	0	0	-1	1																	Site includes two permissions, permission 5/2021/1594 for 1 dwelling and permission 5/2018/1689 for 3 dwellings
5/2020/1582	36 Burston Drive, How Wood	4	-1	3	0	4																			
5/2019/2737	7, 9 and land to the rear of 5 West Way, Harpenden	4	-2	0	2	0	-2	4																	
5/2020/2318 5/2019/3252 5/2019/1973	Cromwell Piggeries, Marshalls Heath Lane, Wheathampstead	4		4	0	4																			Permission 5/2020/2318 supersedes permissions 5/2019/3252 and 5/2019/1973.
5/2017/2602	132 & 132A Kings Road, London Colney	4		4	0	4																			
5/2020/0193 5/2017/2893	143b, 143c and Land Rear of 143 Victoria Street, St Albans	4		4	0	4																			Permission 5/2020/0193 supersedes permission 5/2017/2893.
5/2022/2766 5/2017/3287	113 London Road, St Albans	4		0	0	0		4																	



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2022/0710 5/2021/1987 5/2021/0367 5/2019/0717 5/2018/2016	2 Sandridge Road & 1 Sandpit Lane, St Albans	4		0	4	0	4																		Permission 5/2022/0710 supersedes permissions 5/2021/1987, 5/2021/0367, 5/2019/0717 and 5/2018/2016
5/2021/0083 5/2018/1544	Rear Of 258 Hatfield Road, St Albans	4		0	4	0	4																		Permission 5/2021/0083 supersedes permission 5/2018/1544
5/2020/2505 5/2018/1945	Land South Of Minister Court, Frogmore	4		4	0	4																			Permission 5/2020/2505 supersedes permission 5/2018/1945.
5/2020/0238	83 & 85 Kings Road, London Colney	4	-2	0	2	0																			
5/2020/1095	Crown House, 1a Crown Street, Redbourn	4		0	4	0	4																		
5/2020/0139	107 Camp Road, St Albans	4	-1	0	3	0	-1	4																	
5/2021/0555	Odyssey Cinema, 166 London Road, St Albans	4		0	4	0	4																		
5/2021/2514 5/2021/2119 5/2020/0772 5/2019/1426	Land at Lady Bray Farm and Lady Bray Farm, Kennel Lane, Kinsbourne Green	4		0	4	0	4																		Permissions 5/2021/2514 and 5/2021/2119 supersede permissions 5/2020/0772 and 5/2019/1426. Site includes two permissions, permission 5/2021/2119 for 3 dwellings and permission



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
																									5/2021/2514 for 1 dwelling.
5/2021/1268	226a and 226b London Road, St Albans	4	-2	0	2	0	-2	4																	
5/2021/1824 5/2021/1826	Land At The Stables, Nicholls Farm, Livery Yard, Lybury Lane Redbourn, Redbourn	4		0	4	0	2	2																	Site includes two permissions, permission 5/2021/1824 for 2 dwellings and permission 5/2021/1826 for 2 dwellings
5/2022/0527	Broadway Chambers, St Peters Street, St Albans	4		0	4	0		4																	
5/2020/1124	Land adjacent to The Mill House, Coursers Road, Colney Heath	4		0	4	0		4																	
5/2020/0420 5/2014/1450	Gorhambury, St Albans	3	-2	-1	2	0	-1	3																	Permission 5/2020/0420 supersedes permission 5/2014/1450.
5/1989/0659	Adj 14 Barry Close, Chiswell Green	3		2	1	0	1																		Extant permission
5/2016/2877 5/2016/0403	33, 34 And Part Of 35 The Close, Harpenden	3	-2	-1	2	0	2																		Permission 5/2016/2877 partially supersedes permission 5/2016/0403
5/2020/0475	204 Park Street Lane, How Wood	3	-1	-1	3	0	3																		
5/2021/2242	32 Cambridge Road, St Albans	3	-1	2	0	3																			
5/2021/1974 5/2018/0629	The Elms, 24 Hall Place Gardens, St Albans	3		0	3	0	3																		Permission 5/2021/1974 supersedes permission 5/2018/0629



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2019/1622	399 & 399a Hatfield Road, St Albans	3	-1	0	2	0	-1	3																	
5/2021/1591 5/2017/2626	Redbourn Library, Lamb Lane, Redbourn	3		3	0	3																			Permission 5/2021/1591 supersedes permission 5/2017/2626
5/2022/0173 5/2018/2175	Land Rear Of Alban House, St Peters Street, St Albans	3		0	3	0		3																	
5/2019/1210	The Cottage, The Common, Kinsbourne Green, Harpenden	3		0	3	0																			
5/2019/0223	Land Between 2 And 16 Radlett Road, Frogmore, Park Street	3		3	0	3																			
5/2020/1624	5 Mount Pleasant Lane, Bricket Wood	3	-1	0	2	0	-1	3																	
5/2020/0463	4a-8 Piggottshill Lane, Harpenden	3	-2	0	1	0	-2	3																	
5/2020/1923	Garage Rear Of 77-79 Station Road, Smallford	3	-1	0	2	0	-1	3																	
5/2021/0415 5/2019/2786	Land rear of 8-10 Prospect Road, St Albans	3		0	3	0	3																		Permission 5/2021/0415 supersedes permission 5/2019/2786
5/2020/3062 5/2020/1391	49 Hatfield Road, St Albans	3	-1	0	2	0	-1	3																	Permission 5/2020/3062 supersedes permission 5/2020/1391
5/2020/1259	Houndwood Stables, Houndwood Farm, Harper Lane, Shenley	3		0	3	0	3																		



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/2861 5/2020/3009	Land Rear of 50-54 Francis Avenue, St Albans	3		0	3	0	3																		Permission 5/2021/2861 supersedes permission 5/2020/3009
5/2021/3482 5/2020/3142 5/2020/3143	Batford Farm, Common Lane, Batford, Harpenden	3		0	3	0	3																		Permission 5/2021/3482 supersedes permissions 5/2020/3142 and 5/2020/3143
5/2022/1645 5/2021/0075 5/2021/0075 5/2018/2734	182-186 Folly Lane, St Albans	3	-3	-3	3	-3	3																		Permission 5/2022/1645 supersedes permissions 5/2021/0075, 5/2021/0075 and 5/2018/2734
5/2020/0835	Warwick House, 21-23 London Road, St Albans	3		3	0	3																			Permission 5/2020/0835 allowed on appeal
5/2019/0249 5/2019/3080	227 & 227a Hatfield Road, St Albans	3	-1	2	0	2																			Permission 5/2019/0249 supersedes permission 5/2019/3080. Proposed 4 C4 Houses in Multiple Occupation Bedrooms = 1 C3 dwelling.
5/2021/1452	18-20 Wood End Road, Harpenden	3	-2	1	0	3																			
5/2021/0659	Land R/O The Red Cow PH, 171 Westfield Road, Harpenden	3		3	0	3																			
5/2021/3381	50-52 Mayflower Road, How Wood, St Albans	3	-2	1	0	1																			



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2022/1026 5/2021/3032	Land Rear of 97 to 105 The Hill, Wheathampstead	3		0	3	0		3																	Permission 5/2022/1026 supersedes permission 5/2021/3032
5/2021/3107	Land rear of 15, 17 & 19 Tuffnells Way, Harpenden	3		0	3	0		3																	
5/2021/3461	28 Hazel Road, Park Street	3	-1	2	0	2																			
5/2021/3326	6 Highfield Road, Sandridge	3	-1	0	2	0		-1	3																
5/2021/3615	25 Warwick Road, St Albans	3	-1	0	2	0		-1	3																
5/2022/1150	13 Holywell Hill, St Albans	3		0	3	0		3																	
5/2001/2104	Shafford Farm, Redbourn Road, St Albans	2		1	1	0	1																		Extant permission
5/2021/3212 5/2019/2749 5/2018/0542	71 Townsend Lane, Harpenden	2	-1	0	1	0	1																		Permissions 5/2021/3212 and 5/2019/2749 supersede permission 5/2018/0542.
5/2017/1426	7 Woodside Road, Bricket Wood	2	-1	-1	2	0	2																		
5/2017/1904	27 Becketts Avenue, St Albans	2	-1	-1	2	0	2																		
5/2020/2240 5/2019/3100	25 Abbey Avenue, St Albans	2	-1	1	0	2																			Permission 5/2020/2240 supersedes permission 5/2019/3100
5/2020/0491	24 Grove Avenue, Harpenden	2	-1	1	0	2																			
5/2020/1233 5/2017/3079	Land Adj 9 Southgate Court, Luton Road, Harpenden	2		0	2	0	2																		Permission 5/2020/1233 supersedes permission 5/2017/3079



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2020/1093 5/2017/0938	20a Holywell Hill, St Albans	2	-1	0	1	0	-1	2																	Permission 5/2020/1093 supersedes permission 5/2017/0938
5/2021/2069 5/2018/0865	Sopwell Mill Farm, 61 Cottonmill Lane, St Albans	2		0	2	0	2																		Permission 5/2021/2069 supersedes permission 5/2018/0865
5/2021/0265 5/2019/2076	21 The Pleasance, Harpenden	2	-1	0	1	1	1																		Permission 5/2021/0265 supersedes permission 5/2019/2076
5/2018/2266	Grimsdyke Lodge, Hatfield Road, St Albans	2		0	2	0																			
5/2020/1035 5/2017/1294	12 Bloomfield Road, Harpenden	2	-1	-1	2	0	2																		Permission 5/2020/1035 supersedes permission 5/2017/1294
5/2021/1735 5/2017/3659	Land adj 14 Summerfield Close, London Colney	2		2	0	2																			Permission 5/2021/1735 supersedes permission 5/2017/3659
5/2018/1254	1 And 2 Land Adjacent To Martyr Close, St Albans	2		0	2	0	2																		
5/2021/3061 5/2018/2604	Garages Rear Of 34 To 40 College Road, St Albans	2		0	2	0	2																		
5/2022/1683 5/2021/2303 5/2019/0477	Land rear of 18-22 Bucknalls Drive, Bricket Wood	2		0	2	0		2																	Permission 5/2022/1683 supersedes permissions 5/2021/2303 and 5/2019/0477
5/2020/1909 5/2019/0884	52 Oaklands Lane, Smallford, St Albans	2	-1	0	1	1	1																		Permission 5/2020/1909 supersedes permission 5/2019/0884



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2018/1413	Aldwickbury School, Wheathampstead Road, Harpenden	2	-2	-1	1	0	-1	2																	
5/2019/3249	Land R/O 56 Harpenden Road, St Albans	2		0	2	0																			
5/2021/0850 5/2020/1847	32 Burston Drive, How Wood	2	-1	1	0	2																			Permission 5/2021/0850 supersedes permission 5/2020/1847
5/2020/1906	29 Collyer Road, London Colney	2	-1	0	1	0	-1	2																	
5/2016/3281	90 & 90a Grange Street, St Albans	2	-2	0	0	0	-2	2																	
5/2020/0464	Land R/O 43 & 45 Firwood Avenue, St Albans	2		2	0	2																			
5/2021/1241 5/2021/1220 5/2020/1060	35c Lancaster Road, St Albans	2		2	0	2																			Site includes two permissions, permission 5/2021/1241 for 1 dwelling and permission 5/2021/1220 for 1 dwelling. Permissions 5/2021/1241 and 5/2021/1220 supersedes permission 5/2020/1060.
5/2020/1215	Adjacent 155 Camp Road, St Albans	2		2	0	2																			
5/2021/2950 5/2020/1282	3 Watford Road, St Albans	2		0	2	0	2																		Permission 5/2021/2950 supersedes permission 5/2020/1282
5/2020/1850	12 Admirals Walk, St Albans	2	-1	0	1	0	-1	2																	



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2022/2336 5/2020/2216	The Cherry Trees Indian Restuarant, 261 Lower Luton Road, Wheathampstead	2	-1	0	1	0			-1	2															Permission 5/2022/2336 supersedes permission 5/2020/2216
5/2020/2995	Brickfield Farm, Coles Lane, Kinsbourne Green, Harpenden	2		0	2	0	2																		
5/2021/0499	Pincrest, Sauncey Avenue, Harpenden	2	-1	0	1	0	-1	2																	
5/2021/0737	14 Frogmore, St Albans	2	-1	1	0	1																			
5/2021/0547	Trentburn, St Bernards Road, St Albans	2	-1	1	0	2																			
5/2020/1207 5/2021/0937	Land Adj 1 Railway Cottages, Station Road, Bricket Wood	2		0	2	0	2																		Permission 5/2020/1207 supersedes permission 5/2021/0937. Permission 5/2020/1207 allowed at appeal.
5/2021/0337	The Grove, Livery Stables, The Grove, Pipers Lane, Harpenden	2		0	2	0	2																		
5/2021/0315 5/2020/0421	7 Manor Road, St Albans	2	-2	0	0	0																			Site includes 2 permissions, permission 5/2021/0315 for 1 dwelling and permission 5/2020/0421 for 1 dwelling
5/2022/0401 5/2021/2923 5/2021/1064 5/2021/0854	62 Spencer Street and 42-42C Verulam Road, St Albans	2		0	2	0	2																		Permission 5/2022/0401 supersedes permissions 5/2021/2923, 5/2021/1064



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2020/2186	St Matthews Residential Care Home, Chequer Lane, Redbourn	2		0	2	0	2																		and 5/2021/0854 Conversion ratio of 1.8 applied to 4 C2 bedrooms (Housing Delivery Test Measurement Rule Book). C3 dwellings equivalent = 2 dwellings (4 / 1.8 = 2 [nearest whole number]).
5/2021/3214	Land Rear of 131 Mount Pleasant Lane, Bricket Wood	2		0	2	0	2																		
5/2021/2853	38 Burston Drive, St Albans	2	-1	1	0	1																			
5/2021/1523	24 St Annes Road, London Colney	2	-1	0	1	0	-1	2																	
5/2022/0095	53 White Horse Lane, London Colney	2	-1	0	1	0		-1	2																
5/2021/1918 5/2021/1917	12 Hemel Hempstead Road, Redbourn	2		0	2	0	2																		Permission 5/2021/1918 supersedes permission 5/2021/1917
5/2021/3139	2a Crown Street, Redbourn	2		0	2	0	2																		
5/2020/1299	17 Woodstock Road North, St Albans	2	-1	0	1	0		-1	2																
5/2022/2769 5/2021/0286	17 Hazelmere Road, St Albans	2	-1	0	1	0		-1	2																Permission 5/2022/2769 supersedes permission 5/2021/0286
5/2021/2135	118-120 Victoria Street, St Albans	2		2	0	2																			
5/2021/2725	364 Hatfield Road, St Albans	2	-1	-1	2	-1	2																		



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/3614	1 Sandridgebury Lane, St Albans	2	-1	-1	2	-1	2																		
5/2021/2163 5/2021/0758	Land Between 106 And 116 Tollgate Road, Colney Heath	2		2	0	2																			Permission 5/2021/2163 supersedes permission 5/2021/0758
5/2021/3481 5/2021/0693	First Floor Offices, 9-10 Harding Parade, Station Road, Harpenden	2		0	2	0	2																		Site includes two permissions, permission 5/2021/3481 for 1 net dwelling and permission 5/2021/0693 for 1 net dwelling
5/2021/3565	5 The Meads, Bricket Wood	2	-1	-1	2	-1	2																		
5/2022/1778	46 West Riding, Bricket Wood	2	-1	0	1	0		-1	2																
5/2021/3462	15 Jameson Road, Harpenden	2	-1	-1	2	-1	2																		
5/2022/0470	36 Porters Hill, Harpenden	2	-1	-1	2	-1	2																		
5/2022/0494	1 Lea Road, Harpenden	2	-1	0	1	0		-1	2																
5/2022/0723 5/2021/2332 5/2020/0200	86 Wheathampstead Road, Harpenden	2	-1	0	1	0		-1	2																Permission 5/2022/0723 supersedes permissions 5/2021/2332 and 5/2020/0200
5/2022/1208	3 Hillside Road, Harpenden	2	-1	0	1	0		-1	2																
5/2022/1257	8 Victoria Road, Harpenden	2		2	0	2																			
5/2022/1762 5/2022/1247	37 Burstton Drive, Park Street	2	-1	0	1	0		-1	2																Permission 5/2022/1762 supersedes permission 5/2022/1247
5/2022/1466	151 High Street, London Colney	2		0	2	0	2																		



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2020/3200	2 Market Place and 16 - 18 High Street, St Albans	2		0	2	0		2																	
5/2022/2303	26 High Ash Road, Wheathampstead	2	-1	0	1	0	-1	2																	
5/2022/2427	3 Wildwood Avenue, Bricket Wood	2		0	2	0					2														Permission in principle granted for permission 5/2022/2427
5/2022/1989	26 Lyndhurst Drive, Harpenden	2	-1	0	1	0		-1	2																
5/2022/2477	29 Woodstock Road North, St Albans	2	-1	0	1	0		-1	2																
5/2020/2170 5/2018/1621	10 Alders End Lane, Harpenden	1	-1	0	0	1																			Permission 5/2020/2170 supersedes permission 5/2018/1621
5/1998/0577	Woodside Cottage, Aubrey Lane, Redbourn	1	-1	-1	1	0	1																		
5/2018/2880	Garden Cottage, Annables Lane, Kinsbourne Green, Harpenden	1	-1	0	0	1																			
5/2018/3367	7 Wood End Hill, Harpenden	1	-1	0	0	1																			
5/2019/0861	4 Pondwicks Close, St Albans	1	-1	-1	1	0	1																		
5/2019/1801	4 Midway, St Albans	1	-1	-1	1	0	1																		
5/2019/2833	54 Marshalswick Lane, St Albans	1	-1	0	0	1																			
5/2020/0836	Paddock End, Kimpton Bottom, Harpenden	1	-1	0	0	1																			
5/2020/2331	17 The Uplands, Harpenden	1	-1	0	0	1																			
5/2020/2700	59 Battlefield Road, St Albans	1	-1	0	0	1																			



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/3133 5/2018/3282	4 Bamville Wood, East Common, Harpenden	1	-2	-2	1	0	1																		
5/2019/0422	12 Wheatfield Road, Harpenden	1	-1	0	0	1																			
5/2019/1251	10 Tuffnells Way, Harpenden	1	-1	0	0	1																			
5/2022/0789 5/2019/2235 5/2016/3817	The Barn & Holm Oaks, Albert Bygrave Retail Park, North Orbital Road, St Albans	1	-1	-1	1	0		1																	Permission 5/2022/0789 partially supersedes permissions 5/2019/2235 and 5/2016/3817
5/2020/0876	86 Beaumont Avenue, St Albans	1	-1	0	0	1																			
5/2020/1673	60 Marshals Drive, St Albans	1	-1	-1	1	0	1																		
5/2020/1771	61 Sandridge Road, St Albans	1	-1	0	0	1																			
5/2021/2854 5/2020/2035 5/2018/1431	16 Gilpin Green, Harpenden	1	-2	-2	1	0	1																		Site includes previous losses for two permissions 5/2021/2854 and 5/2020/2035, which supersede permission 5/2018/1431
5/2020/2585	5 Bamville Wood, Harpenden	1	-1	-1	1	0	1																		
5/2020/2862	212-212a Sandridge Road, St Albans	1	-2	-1	0	1																			
5/2020/2894 5/2020/0519	3 Faulkners End Cottages, Roundwood Lane, Harpenden	1	-1	0	0	1																			Permission 5/2020/2894 supersedes permission 5/2020/0519



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2020/3069 5/2020/1748	20 Park Avenue South, Harpenden	1	-1	-1	1	0	1																		Permission 5/2020/3069 supersedes permission 5/2020/1748
5/2022/0716 5/2021/0024	10 Prospect Lane, Harpenden	1	-1	-1	1	0	1																		Permission 5/2022/0716 partially supersedes permission 5/2021/0024
5/2021/3388 5/2021/0110	19 Kirkwick Avenue, Harpenden	1	-2	-2	1	0	1																		
5/2021/0688 5/2020/0969	87 Sandpit Lane, St Albans	1	-1	0	0	1																			Permission 5/2021/0688 supersedes permission 5/2020/0969
5/2021/2536 5/2020/1794	40 The Uplands, Harpenden	1	-1	-1	1	0	1																		Permission 5/2021/2536 supersedes permission 5/2020/1794
5/2021/2554	42 Mayflower Road, How Wood	1	-1	0	0	1																			
5/2021/3465 5/2018/0644	1 Mount Pleasant, St Albans	1	-1	0	0	0		-1	1																
5/2020/0713 5/2017/3581	6 Grove Road, Harpenden	1		0	1	0	1																		Permission 5/2020/0713 supersedes permission 5/2017/3581
5/2017/0855	33 Stewart Road, Harpenden	1		0	1	0	1																		
5/2018/1566	Land R/O 68 Oakwood Road, Bricket Wood	1		0	1	0	1																		
5/2019/1704	Building 1 Lamer Park Farm, Lamer Lane, Wheathampstead	1		1	0	1																			
5/2019/3094	Unit 2, Meads Lane Industrial Estate, Meads	1		1	0	1																			



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
	Lane, Wheathampstead																								
5/2017/3661	3a Albion Road, St Albans	1		0	1	0	1																		
5/2021/0835 5/2017/3601	65 The Hill, Wheathampstead	1		0	1	0	1																		Permission 5/2021/0835 supersedes permission 5/2017/3601
5/2019/1939 5/2016/2362	The Fruit Store, Gorbambury, St Albans	1		0	1	0																			
5/2020/0555 5/2017/2409	Butter Foal Stud And Tack Shop, Smug Oak Lane, Bricket Wood	1		0	1	0	1																		Permission 5/2020/0555 supersedes permission 5/2017/2409
5/2017/3067	Faulkners End Farm, Roundwood Lane, Harpenden	1		0	1	0	1																		
5/2019/2258 5/2018/2344	The Wood Store, Redding Lane, Norrington End, Redbourn	1		1	0	1																			Permission 5/2019/2258 supersedes permission 5/2018/2344
5/2019/2772	Heath House & Flats 1 & 2, 9 Harpenden Road, St Albans	1		0	1	0	1																		
5/2020/0256 5/2019/1174	1 And 2 Bride Hall Cottages, Bride Hall Lane, Welwyn	1	-2	0	-1	0	-2	1																	Permission 5/2020/0256 supersedes permission 5/2019/1174
5/2019/1032	81 Sopwell Lane, St Albans	1	-2	0	-1	0																			
5/2022/0924 5/2019/1269	2a Warwick Road, St Albans	1		0	1	0	1																		Permission 5/2022/0924 supersedes permission 5/2019/1269
5/2020/0024	Tankerfield House, 1 Romeland Hill, St Albans	1		1	0	1																			



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5/2017/2447	74 West Riding, Bricket Wood	1		1	0	1																			
5/2020/0859 5/2017/0118	4 Hatching Green Close, Harpenden	1		0	1	0	1																		Permission 5/2020/0859 supersedes permission 5/2017/0118
5/2020/2917 5/2018/0925	Land To Rear Of 116 To 118 Lower Luton Road, Harpenden	1		0	1	0	1																		Permission 5/2020/2917 supersedes permission 5/2018/0925
5/2022/0497 5/2018/3239	22 Roundfield Avenue, Harpenden	1		0	1	0		1																	
5/2021/1953 5/2018/2237	14 Browning Road, Harpenden	1	-1	0	0	0	-1	1																	Permission 5/2021/1953 supersedes permission 5/2018/2237
5/2018/1371	Land adj 103 How Wood, How Wood	1		0	1	0	1																		
5/2020/1755 5/2017/2720	Land Adj 38 Morris Way, London Colney	1		1	0	1																			Permission 5/2020/1755 supersedes permission 5/2017/2720
5/2022/1982 5/2019/0440 5/2017/1520	23 Mount Pleasant, St Albans	1	-1	0	0	0		-1	1																Permission 5/2022/1982 supersedes permissions 5/2019/0440 and 5/2017/1520
5/2022/1815 5/2021/3093 5/2017/1669	Land Rear Of 3 And 5 Approach Road And Accessed Via Orient Close, St Albans	1		0	1	0		1																	Permission 5/2022/1815 supersedes permissions 5/2021/3093 and 5/2017/1669
5/2020/2837 5/2019/2978 5/2017/2276	Land Adjacent The Blue Anchor PH, 45 Fishpool Street, St Albans	1		0	1	0	1																		Permission 5/2020/2837 supersedes permissions 5/2019/2978



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																									and 5/2017/2276
5/2020/1799 5/2017/2584	61 Cotlandswick, London Colney	1		0	1	0	1																		Permission 5/2020/1799 supersedes permission 5/2017/2584
5/2020/2938 5/2017/3655	Car Parking opposite 9 to 13 Temperance Street, St Albans	1		1	0	1																			Permission 5/2020/2938 supersedes permission 5/2017/3655
5/2018/1540	R/O 68 Harpenden Road, St Albans	1		0	1	0	1																		
5/2021/0792 5/2018/2057	Land R/O 14 & 16 Marshals Drive, St Albans	1		0	1	0	1																		Permission 5/2021/0792 supersedes permission 5/2018/2057
5/2018/2094	48 Marshals Drive, St Albans	1	-1	-1	1	0	1																		
5/2020/2602 5/2018/2124	R/O 3 Sandridge Road, St Albans	1		1	0	1																			Permission 5/2020/2602 supersedes permission 5/2018/2124
5/2021/2909 5/2018/2440	Land adj 3 Hamilton Road, St Albans	1		0	1	0		1																	
5/2022/0351 5/2018/2895	1 Hall Place Gardens, St Albans	1		0	1	0		1																	
5/2021/1398 5/2018/3013	17 New House Park, St Albans	1	-1	0	0	0																			Permission 5/2021/1398 supersedes permission 5/2018/3013
5/2021/0082 5/2018/0399	Land Adjoining 11 Green Lane, St Albans	1		1	0	1																			Permission 5/2021/0082 supersedes permission 5/2018/0399



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5/2021/2400 5/2020/1734 5/2018/0455	Dutch Barn, Harpendenbury Farm, Harpendenbury, Redbourn	1		0	1	0	1																		Permission 5/2021/2400 supersedes permissions 5/2020/1734 and 5/2018/0455
5/2019/0093	12 The Warren, Harpenden	1	-1	-1	1	-1	1																		
5/2022/1109 5/2020/1524 5/2019/0887	43 Park Avenue North, Harpenden	1	-1	-1	1	-1	1																		Permission 5/2022/1109 supersedes permissions 5/2020/1524 and 5/2019/0887
5/2019/2168	50 Roundwood Park, Harpenden	1	-1	0	0	0																			
5/2019/2555	Land Adj 31 West Common Way, Harpenden	1		0	1	0	1																		
5/2019/2633	7 Tintern Close, Harpenden	1		0	1	0																			
5/2019/1287	Land R/O 24 Mayflower Road, How Wood	1		0	1	0																			
5/2021/0026 5/2020/1699 5/2019/1428	Land Adjacent to 110a Park Street Lane, How Wood	1		0	1	0	1																		Permission 5/2021/0026 supersedes permissions 5/2020/1699 and 5/2019/1428
5/2019/1281	172 High Street, London Colney	1		0	1	0																			
5/2021/1894 5/2021/0759 5/2019/1687	14 Perham Way, London Colney	1		0	1	0	1																		Permission 5/2021/1894 supersedes permissions 5/2021/0759 and 5/2019/1687
5/2019/2946	12 Pipers Close, Redbourn	1		0	1	0	1																		
5/2019/2488	1 Jersey Lane, St Albans	1		1	0	1																			



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5/2019/2513	Land R/O 8 Mitchell Close, St Albans	1		0	1	0																			
5/2019/2850	38 Saxon Road, Wheathampstead	1		0	1	0																			
5/2021/1610 5/2019/1904	The Old Lodge, Drop Lane, Bricket Wood	1		1	0	1																			Permission 5/2021/1610 supersedes permission 5/2019/1904
5/2019/2561	Land to the Rear of 32 Ridgewood Drive, Harpenden	1		0	1	0	1																		
5/2020/1217 5/2019/0894	25 Homewood Road, St Albans	1	-1	0	0	0	-1	1																	Permission 5/2020/1217 supersedes permission 5/2019/0894
5/2019/3173	49 The Park, St Albans	1	-1	-1	1	0	1																		
5/2020/0169	33 Chalkdell Fields, St Albans	1		1	0	1																			
5/2020/0331 5/2018/3147	Land East of 21 Grasmere Avenue, Harpenden	1		0	1	0	1																		Permission 5/2020/0331 supersedes permission 5/2018/3147
5/2021/1864 5/2020/2159	53 & 55 Alexander Road, London Colney	1		1	0	1																			Permission 5/2021/1864 supersedes permission 5/2020/2159
5/2020/1450	Land Between 22 And 24 Caesars Road, Wheathampstead	1		1	0	1																			
5/2020/1693 5/2019/1634	Orchard Farm, 105 Dunstable Road, Redbourn	1		0	1	0	1																		Permission 5/2020/1693 supersedes permission 5/2019/1634
5/2020/2079 5/2019/0208	4 Leasey Dell Drive, Wheathampstead	1		1	0	1																			Permission 5/2020/2079 supersedes permission 5/2019/0208



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5/2020/1665	Land Rear Of 34 North Riding Accessed From West Riding, Bricket Wood	1		1	0	1																			
5/2020/2181	23 Oakwood Road, Bricket Wood	1	-1	0	0	1																			
5/2021/0776 5/2020/2068	Land Adjacent 1a, Barry Close, Chiswell Green	1		1	0	1																			Permission 5/2021/0776 supersedes permission 5/2020/2068
5/2020/0414	6 Penny Croft, Harpenden	1	-1	0	0	0	-1	1																	
5/2020/0785	2 Someries Road, Harpenden	1		0	1	0	1																		
5/2021/1759 5/2020/0828	2 Broadstone Road, Harpenden	1		0	1	0	1																		Permission 5/2021/1759 supersedes permission 5/2020/0828
5/2020/1516	Land Adjacent 6 High Elms, Harpenden	1		1	0	1																			
5/2020/1544	20 Penny Croft, Harpenden	1	-1	0	0	1																			
5/2021/0179 5/2020/1813	2 Greyfriars Lane, Harpenden	1		1	0	1																			
5/2020/1858	6 Stewart Road, Harpenden	1	-1	-1	1	-1	1																		
5/2020/0738	47 Manor Road, Wheathampstead	1		0	1	0	1																		
5/2020/0347	4 St Marys Close, Redbourn	1	-1	0	0	0	-1	1																	
5/2021/3223 5/2020/1494	56 Oaklands Lane, Smallford	1		0	1	0		1																	Permission 5/2021/3223 supersedes permission 5/2020/1494
5/2020/0341	3 Cloister Garth, St Albans	1		0	1	0	1																		
5/2020/0411	46 Marshals Drive, St Albans	1	-1	0	0	0	-1	1																	



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2020/0841	31 Furse Avenue, St Albans	1		1	0	1																			
5/2020/2384 5/2020/1192	Ellen House, 63 London Road, St Albans	1		0	1	0	1																		Permission 5/2020/2384 supersedes permission 5/2020/1192
5/2021/0098 5/2020/1680	105 Cambridge Road, St Albans	1		1	0	1																			Permission 5/2021/0098 supersedes permission 5/2020/1680
5/2020/1700	50 London Road, St Albans	1		0	1	0	1																		
5/2021/2365 5/2020/1889	232 Sandridge Road, St Albans	1	-1	0	0	1																			Permission 5/2021/2365 supersedes permission 5/2020/1889
5/2020/2348	153 Victoria Street, St Albans	1		0	1	0	1																		
5/2020/1633	6 Barley Beans, Marford Road, Wheathampstead	1	-1	0	0	1																			
5/2020/0204	Barns And Stables At Sleepshyde Farm, Sleepshyde, Smallford	1		0	1	0	1																		
5/2021/0067 5/2020/0706	Croft Farm, Cherry Tree Lane, Wheathampstead	1		0	1	0	1																		Permission 5/2021/0067 supersedes permission 5/2020/0706
5/2021/3329 5/2020/1663 5/2020/1019	Canley, The Common, Kinsbourne Green	1	-1	-1	1	-1	1																		Permission 5/2021/3329 supersedes permissions 5/2020/1663 and 5/2020/1019
5/2020/1351	Meadow Cottage, Kennel Lane, Kinsbourne Green	1	-1	0	0	0	-1	1																	



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2020/1615	Woodbury Manor, Lye Lane, St Albans	1		0	1	0	1																		
5/2020/2720	80 Oakwood Road, Bricket Wood	1	-1	0	0	0	-1	1																	
5/2020/2232	2 Browning Road, Harpenden	1	-1	0	0	0	-1	1																	
5/2020/2323	Land Rear Of 28 To 32 Carisbrooke Road, Harpenden	1		0	1	0	1																		
5/2021/0621 5/2020/2717	11 Moreton End Lane, Harpenden	1	-1	0	0	1																			Permission 5/2021/0621 supersedes permission 5/2020/2717
5/2020/3121	39 Tuffnells Way, Harpenden	1	-1	0	0	0	-1	1																	
5/2020/2218	Land adj 243 Cell Barnes Lane, St Albans	1		0	1	0	1																		
5/2020/2406	38 Maynard Drive, St Albans	1		0	1	0	1																		
5/2020/2412	38 Holywell Hill, St Albans	1		0	1	0	1																		
5/2021/1233 5/2020/2659	217 Camp Road, St Albans	1	-1	0	0	0																			Permission 5/2021/1233 supersedes permission 5/2020/2659
5/2020/2979	15 Seymour Road, St Albans	1	-1	0	0	1																			
5/2021/0245	105 Victoria Street, St Albans	1		0	1	0	1																		
5/2021/1155 5/2019/0045	1 Greyfriars Lane, Harpenden	1	-1	-1	1	-1	1																		Permission 5/2021/1155 supersedes permission 5/2019/0045



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2020/2781	The Kestrels Care Home, 2-4 The Kestrels, Bucknalls Drive, Bricket Wood	1		0	1	0	1																		Conversion ratio of 1.8 applied to 2 C2 bedrooms (Housing Delivery Test Measurement Rule Book). C3 dwellings equivalent = 1 dwelling (2 / 1.8 = 1 [nearest whole number]).
5/2021/1128	17 & 17a French Row, St Albans	1	-1	-1	1	0	1																		
5/2021/2566	40 Ridgewood Drive, Harpenden	1	-1	-1	1	0	1																		
5/2021/2881	8 Homewood Road, St Albans	1	-1	0	0	1																			
5/2021/2920 5/2020/1328	316 Hatfield Road, St Albans	1		0	1	0	1																		Permission 5/2021/2920 supersedes permission 5/2020/1328
5/2021/3418	Kestrels, Spring Road, Harpenden	1	-1	-1	1	-1	1																		
5/2020/3201	Land between 14 and 18, The Uplands, Bricket Wood	1		0	1	0	1																		
5/2021/2743 5/2021/1800	86 Mount Pleasant Lane, Bricket Wood	1	-1	0	0	0	-1	1																	Permission 5/2021/2743 supersedes permission 5/2021/1800
5/2021/3178	95 Stanley Avenue, Chiswell Green	1	-1	0	0	0																			
5/2021/0189	5 Pondwick Road, Harpenden	1	-1	-1	1	-1	1																		
5/2021/0296	22 Sun Lane, Harpenden	1		0	1	0	1																		
5/2021/1748	11a Croftwell, Harpenden	1	-1	0	0	0																			



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/2704	19a Park Avenue South, Harpenden	1	-1	-1	1	-1	1																		
5/2021/2742	23 & 25 Moreton End Lane, Harpenden	1		0	1	0		1																	
5/2021/2921	45 Park Avenue North, Harpenden	1	-1	-1	1	-1	1																		
5/2021/2944	12 Pondwick Road, Harpenden	1	-1	-1	1	-1	1																		
5/2021/3260	42 Park Avenue North, Harpenden	1	-1	0	0	0	-1	1																	
5/2021/3375	90 Station Road, Harpenden	1	-1	0	0	0	-1	1																	
5/2021/3433	Land Rear of 1-5 Common Lane, Batford, Harpenden	1		0	1	0	1																		
5/2021/3511	18 Prospect Lane, Harpenden	1	-1	-1	1	-1	1																		
5/2021/3491	2 The Mall, How Wood	1		1	0	1																			
5/2020/0947	London Colney Islamic Centre, 174 High Street, London Colney	1	-1	0	0	0	-1	1																	
5/2021/2928	43 White Horse Lane, London Colney	1		0	1	0		1																	
5/2021/2036	169 Watling Street, Park Street	1		1	0	1																			
5/2021/2876	71 and 73 Hemel Hempstead Road, Redbourn	1	-2	0	-1	0	-2	1																	
5/2021/3603	15 Highfield Road, Sandridge	1	-1	-1	1	-1	1																		
5/2021/3537 5/2019/3260	Land Rear Of 213 The Ridgeway, St Albans	1		0	1	0	1																		Permission 5/2021/3537 supersedes permission 5/2019/3260



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/0172	209 Camp Road, St Albans	1		1	0	1																			
5/2021/1327	26 Flavian Close, St Albans	1	-1	0	0	0																			
5/2021/1654	26 Beaumont Avenue, St Albans	1	-1	0	0	0	-1	1																	
5/2021/2954 5/2021/1752	48a Alma Road, St Albans	1	-2	-2	1	-2	1																		
5/2021/1956	2 Dorcas Court, Old London Road, St Albans	1		0	1	0	1																		
5/2021/2414	134 St Albans Road, Sandridge	1	-4	0	-3	0	-4	1																	
5/2021/2674	6 Foxcroft, St Albans	1		0	1	0	1																		
5/2021/2695	Land Rear Of 11 College Place, St Albans	1		0	1	0	1																		
5/2021/3190	27a Townsend Drive, St Albans	1	-1	0	0	0	-1	1																	
5/2022/0109	The Oak House, 14 Starlight Way, St Albans	1		1	0	1																			
5/2022/0265	2a Royal Road, St Albans	1		0	1	0	1																		
5/2020/0138	Northern End Of Mill Walk, Wheathampstead	1		0	1	0	1																		
5/2020/1408	Black Barn, Childwickbury, St Albans	1		0	1	0	1																		
5/2022/1798 5/2021/1279	Long Acre, Holly Lane, Harpenden	1	-1	0	0	0		-1	1																Permission 5/2022/1798 supersedes permission 5/2021/1279
5/2021/1401	New Lodge, Drop Lane, Bricket Wood	1	-1	0	0	0	-1	1																	
5/2021/2244	Bowersbury Farm, Bower Heath, Harpenden	1		1	0	1																			



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/2355	Hornbeam Wood, Common Lane, Batford	1		0	1	0	1																		
5/2022/1391 5/2021/2510	Woodring, Aubrey Lane, St Albans	1	-1	-1	1	-1	1																		Permission 5/2022/1391 supersedes permission 5/2021/2510
5/2021/3155	Raisins Cottage, Mackerye End, Harpenden	1		0	1	0	1																		
5/2021/3470	242 Radlett Road, Frogmore	1	-1	0	0	0	-1	1																	
5/2021/3607	5 Meads Lane, Wheathampstead	1		0	1	0	1																		
5/2022/0039	108 Harper Lane, Radlett	1	-1	-1	1	-1	1																		
5/2021/3159 5/2021/0178	Aberfoyle House, Stapley Road, St Albans	1		0	1	0	1																		
5/2022/0302	110 Mount Pleasant Lane, Bricket Wood	1	-1	-1	1	-1	1																		
5/2022/0884	143 Watford Road, St Albans	1	-1	-1	1	-1	1																		
5/2022/0664	Seven Oaks Cottage, 88 Roestock Lane, Colney Heath	1		0	1	0		1																	
5/2022/0238	5 Wood End Road, Harpenden	1	-1	0	0	0		-1	1																
5/2022/0379	26 Park Avenue North, Harpenden	1	-1	-1	1	-1	1																		
5/2022/0661	25 Grove Avenue, Harpenden	1	-1	0	0	0		-1	1																
5/2022/0755	Land adj 82 Ox Lane, Harpenden	1		0	1	0		1																	
5/2022/0866	31 Park Mount, Harpenden	1	-1	0	0	0		-1	1																
5/2022/1069	6 Pigeonwick, Harpenden	1	-1	0	0	0		-1	1																



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2022/1231	6 Salisbury Avenue, Harpenden	1	-1	-1	1	-1	1																		
5/2022/1303	Land R/O Willowbank, 59 Coldharbour Lane, Harpenden	1		0	1	0		1																	
5/2022/1323	First floor, 18 High Street, Harpenden	1		0	1	0		1																	
5/2022/1347	4 Oakfield Road, Harpenden	1	-1	0	0	0		-1	1																
5/2022/1482	16 Park Avenue South, Harpenden	1	-1	0	0	0		-1	1																
5/2022/1531	33 Rothamsted Avenue, Harpenden	1	-1	-1	1	-1	1																		
5/2022/2062	16 Townsend Lane, Harpenden	1	-1	0	0	0		-1	1																
5/2022/1900	5 Orchard Drive, Park Street	1		1	0	1																			
5/2021/2993	14 Park Avenue, St Albans	1	-1	-1	1	-1	1																		
5/2021/3109	271 Cell Barnes Lane, St Albans	1		0	1	0		1																	
5/2022/0483	31 Homewood Road, St Albans	1	-1	0	0	0		-1	1																
5/2022/2079 5/2022/0786	116 Cambridge Road, St Albans	1		0	1	0		1																	Permission 5/2022/2079 supersedes permission 5/2022/0786
5/2022/1168	219 Hatfield Road, St Albans	1		0	1	0		1																	
5/2022/1547	6 Watford Road, St Albans	1	-1	0	0	0		-1	1																
5/2022/1782	68 Pageant Road, St Albans	1		0	1	0																			
5/2022/1904	69 Sandridge Road, St Albans	1		0	1	0		1																	
5/2022/2285	89 Fishpool Street, St Albans	1	-1	0	0	0		-1	1																
5/2020/2986	Hawthorns, Roestock Lane, Colney Heath	1		0	1	0		1																	



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
5/2021/1480	37 Napsbury Lane, St Albans	1	-1	0	0	0		-1	1																
5/2022/0859	Land to the rear of Wexhams, Lye Lane, St Albans	1		0	1	0		1																	
5/2022/1049	108 Ragged Hall Lane, Chiswell Green	1	-1	0	0	0	-1	1																	
5/2022/1206	Orchard Farm, Sheepcote Lane, Wheathampstead	1		0	1	0		1																	
5/2022/1309	Land At Junction Of Dunstable Road, Luton Lane, Redbourn	1		0	1	0		1																	
5/2022/2381	Little Acre, Sheepcote Lane, Wheathampstead	1	-1	-1	1	-1	1																		
5/2022/2559	Holly Lodge, 10 Park Avenue South, Harpenden	1		0	1	0		1																	
5/2022/2226	27 Wilshere Avenue, St Albans	1		0	1	0		1																	
5/2022/2756	Harvest House, 37 London Road, St Albans	1		0	1	0		1																	
5/2022/2811	38 Abbots Avenue West, St Albans	1		0	1	0		1																	
5/2022/2332	37 Ridgewood Drive, Harpenden	1	-1	0	0	0		-1	1																
5/2022/2338	42A West Common, Harpenden	1	-1	0	0	0		-1	1																
5/2022/2666	14 Park Avenue South, Harpenden	1	-1	0	0	0		-1	1																
5/2022/0266	85 Harpenden Road, St Albans	1	-1	0	0	0		-1	1																
5/2022/1386	197a Marshalswick Lane, St Albans	1	-1	0	0	0		-1	1																
5/2022/2145	12 Tithe Barn Close, St Albans	1	-1	0	0	0		-1	1																



Planning Permission Reference Number(s)	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Current Net Dwelling Completions	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative	
5/2022/2281	20 Cunningham Hill Road, St Albans	1	-1	0	0	0		-1	1																	
5/2022/2379	50 Midway, St Albans	1	-1	0	0	0		-1	1																	
5/2022/2401	49 Midway, St Albans	1	-1	0	0	0		-1	1																	
5/2022/2502	3 Netherway, St Albans	1	-1	0	0	0		-1	1																	
5/2022/2428	15 Castle Rise, Wheathampstead	1	-1	0	0	0		-1	1																	
5/2018/2666 5/2015/0722	Copsewood and A405 Junction, North Orbital Road, Chiswell Green	0	-1	0	-1	0																				
5/2022/0567	Wheathampstead House, Codicote Road, Wheathampstead	0	-1	0	-1	0	-1																			
Permissions (Past Completions and Estimated Future Completions) Totals		3,317	-249	1,166	1,898	401	388	454	379	235	78	128	125	90	0	0	0	0	0	0	0	0	0	0		
Number of dwellings to discount from totals row above. 5% discount on un-started permissions (small sites 1 to 4 dwellings)						0	-7	-4	-3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Total with 5% discount on un-started permissions (small sites 1 to 4 dwellings)						401	381	450	376	235	78	128	125	90	0	0	0	0	0	0	0	0	0	0	0	



Site Allocations

Site Reference Number	Site Name / Address	Estimated Gains (Gross)	Estimated Loss	Estimated Net Dwellings to be Completed	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	Narrative
HA1	Harpenden Memorial Hospital, Harpenden	34		34	0						15	15	4											Made Harpenden Neighbourhood Plan 2019, Policy H10 - Housing Site Allocations HA1 for minimum of 34 dwellings.
HA4	Jewsons, Grove Road, Harpenden	14		14	0						14													Made Harpenden Neighbourhood Plan 2019, Policy H10 - Housing Site Allocations HA4 for minimum of 14 dwellings.
HA6	Land at 63 High Street, Harpenden	5		5	0						5													Made Harpenden Neighbourhood Plan 2019, Policy H10 - Housing Site Allocations HA6 for minimum of 5 dwellings.
HA8	Land and Garages at Longfield Road, Harpenden	4		4	0						4													Made Harpenden Neighbourhood Plan 2019, Policy H10 - Housing Site Allocations HA8 for minimum of 4 dwellings.
Site Allocations Totals		57	0	57	0	0	0	0	0	0	38	15	4	0	0	0	0	0	0	0	0	0	0	

