P003429
FP38086

ST ALBANS CITY & DISTRICT COUNCIL PLAN EXAMINATION

MATTER 4

HARPER LODGE INDUSTRIAL ESTATE, HARPER LANE

AND

LAND OF SHENLEY LANE, LONDON COLNEY

DEREK BROMLEY, FRICS, BIDWELLS

REPRESENTING

1. MR K IVORY OF KT IVORY HAULAGE AND STORAGE

AND

2. MR D IVORY

1. This is a combined submission on behalf of Mr K Ivory and Mr D Ivory, since whilst it relates to two different locations, the main principle of the objections to the Submitted Plan are in principle very similar and it will avoid repetition and duplication.

Question 1 – Green Belt Review

2. The Council's proposed allocation of Park Street Garden Village is misconceived. Fundamentally, the Council has chosen this site for development, the purpose of which is to try and prevent it being developed for another purpose; the purpose which was granted planning permission to meet the national need. SEGRO are represented at the examination.
3. It is extremely doubtful that the Council would promote Park Street Garden Village in the absence of the extant planning permission for the Strategic Rail development, especially having regard to its Green Belt studies. The Park Street Garden Village is identified as Area 30 within the Council's Green Belt study November 2013. Area 30 plays a significant role for many of the purposes of the Green Belt and represents a Strategic Gap.

4. Indeed, the Council in pursuing Park Street Garden Village will create a southern ring of built development stretching from Chiswell Green to London Colney (Appendix 1). The Garden Village is shown edged blue and built areas edged red.

5. If the Council require housing numbers which cannot be achieved within settlements excluded from the Green Belt, the correct approach would be a meaningful attempt to properly engage with the delivery of housing in ways required by the NPPF before identifying green fields and Green Belt land. There is an absence of evidence from the Council that since its failed Local Plan it has reviewed its approach following the more recent NPPF or fully embraced its provisions. The development strategy regarding the Green Belt should be to undertake a comprehensive and detailed review of all settlements and their long term boundaries together with identifying all Brownfield sites which are capable of meeting the future development needs within the District.

Question 2 – Prioritise Previously Developed Land

6. There is no evidence the Council's strategy has altered from its previous failed Plan, notwithstanding the NPPF 2019 includes changes, mainly Paragraph 137 a). The Council has dismissed all Brownfield sites in the Green Belt from the Brownfield sites register simply because of their Green Belt location. It should be noted the NPPF does not distinguish in Paragraph 137 a) between sites located in the rural area, Green Belt or urban area. The Harper Lodge Industrial Estate and land at Shenley Lane sites were submitted to the Council in its Call for Sites and Brownfield sites register.

7. The Harper Lodge Industrial Estate and Racing Stables extend to approximately 6.00 hectares and are more particularly shown edged red on the plan in Appendix 2. Three aerial photographs of the site are provided in Appendix 3.
8. The Industrial Estate and Racing Stables are situated between the settlement of Radlett and to the south of the Excluded area from the Green Belt known as Ventura Park, which is identified in the Submitted Plan. The site is immediately to the east of the mainline St Pancras railway, which is in a deep cutting and heavily treed along its embankment.
9. In terms of location, the site is:

- Radlett and railway station – one mile;

- St Albans – three miles;
- Main bus route with bus stops – 160m.

10. A more general location is shown in Appendix 4.

11. Harper Lane itself has been the subject of improvements to the public footpath and cycle way together with enhanced bus transport links as a result of the redevelopment of Harperbury Hospital, the location of which is shown on Appendix 3. The Harper Lodge Industrial Estate and Racing Stables are Brownfield/previously developed land, as defined in the NPPF.

12. The Industrial Estate comprises a range of warehouses, industrial workshops, various structures and open yard areas. Storage in the yard areas includes high lift machinery together with cars, vans and lorries etc. In addition to the industrial workshops and warehousing, there is a planning permission for a waste transfer station which was in operation until recently.

13. The commercial buildings and yards are shown edged green on Appendix 2 and comprise 3,600 sq metres of buildings.

14. The Racing Stables operation comprise of stables, horse walkers and covered exercise arena together with offices, lads accommodation, manège, car parking and gallop.

15. The racing stable buildings are shown edged purple on Appendix 2 and comprise 2,355 sq metres of buildings.

16. Within the St Albans district there have been a number of Brownfield sites similar to the Harper Lodge Industrial Estate which have been granted planning permission and these are identified in Appendix 4.

    a) The Building Research Station Bricket Wood – previously developed land in the Green Belt, planning permission was granted on appeal for residential redevelopment comprising 100 dwellings.

    b) HSBC training centre – previously developed land in the Green Belt granted planning permission on appeal for residential redevelopment for 138 dwellings.

    c) Harperbury Hospital – previously developed land in the Green Belt granted planning permission for 206 dwellings.

    d) Civil Defence site, Harper Lane – previously developed land in the Green Belt granted planning permission for 23 houses.

17. The Council has not positively engaged in the process of complying with Paragraph 137 a) of the NPPF in respect of identifying Brownfield sites, prior to determining whether there are exceptional circumstances to release green fields from the Green Belt. The Council has dismissed all Brownfield sites in the Green Belt from the Brownfield sites register, simply because of their Green Belt location. It will be evident from the list provided above that the location of Brownfield sites within the Green Belt, has not been a reason to not accept that they can meet the development needs within the district. The Harper Lodge Industrial Estate and the land at Shenley Lane were both submitted in the Council's Call for Sites and Brownfield sites register.

18. It is submitted that the Council's development strategy should have followed the NPPF and identified Brownfield sites such as Harper Lodge Industrial Estate and the Racing Stables in the first instance. The owners have for many years submitted the site for inclusion within the Local Plan, previously as a retirement village and only subsequently reviewing the site for private/affordable housing. The owners pursued enquiries with Audley Retirement for a retirement village, but the Council advised that on the basis of its evidence there was no overriding need and any accommodation would reasonably be provided within the strategic site allocations. The fact that the industry which specialises in retirement home provision clearly believes otherwise and is prepared to invest millions into development projects, points to another conclusion. Clearly, the industry would not do so unless there was demand for the end product. We note Castleoak Care are also making representations.

19. We provide in Appendix 5 and 6 master plan schemes prepared for the site, initially for a retirement village and subsequently, as a consequence of the Council's position regarding the absence of need for retirement accommodation, a private market/affordable housing scheme.

20. The D Ivory site at Shenley Lane, London Colney incorporates an adjoining owner's site known as Rodells. The site is shown in terms of its general location in Appendix 4. It is immediately south of the excluded settlement of London Colney and approximately 250m from the proposed Green Belt allocation known as West London Colney (Policy S6 ix)).

21. The site is more particularly identified edged red on the aerial photograph in Appendix 7. It forms part of a wider Brownfield site.

22. The site at Shenley Lane extends to approximately 0.5 hectares and is used for commercial purposes.

Question 7 – Exceptional Circumstances

23. The Council has failed to positively engage with the NPPF in identifying Brownfield sites to meet future development needs within the Plan before deciding whether there are exceptional circumstances for the further release of Green Belt within the District. The Council has failed to comply with Paragraph 137 of the NPPF.

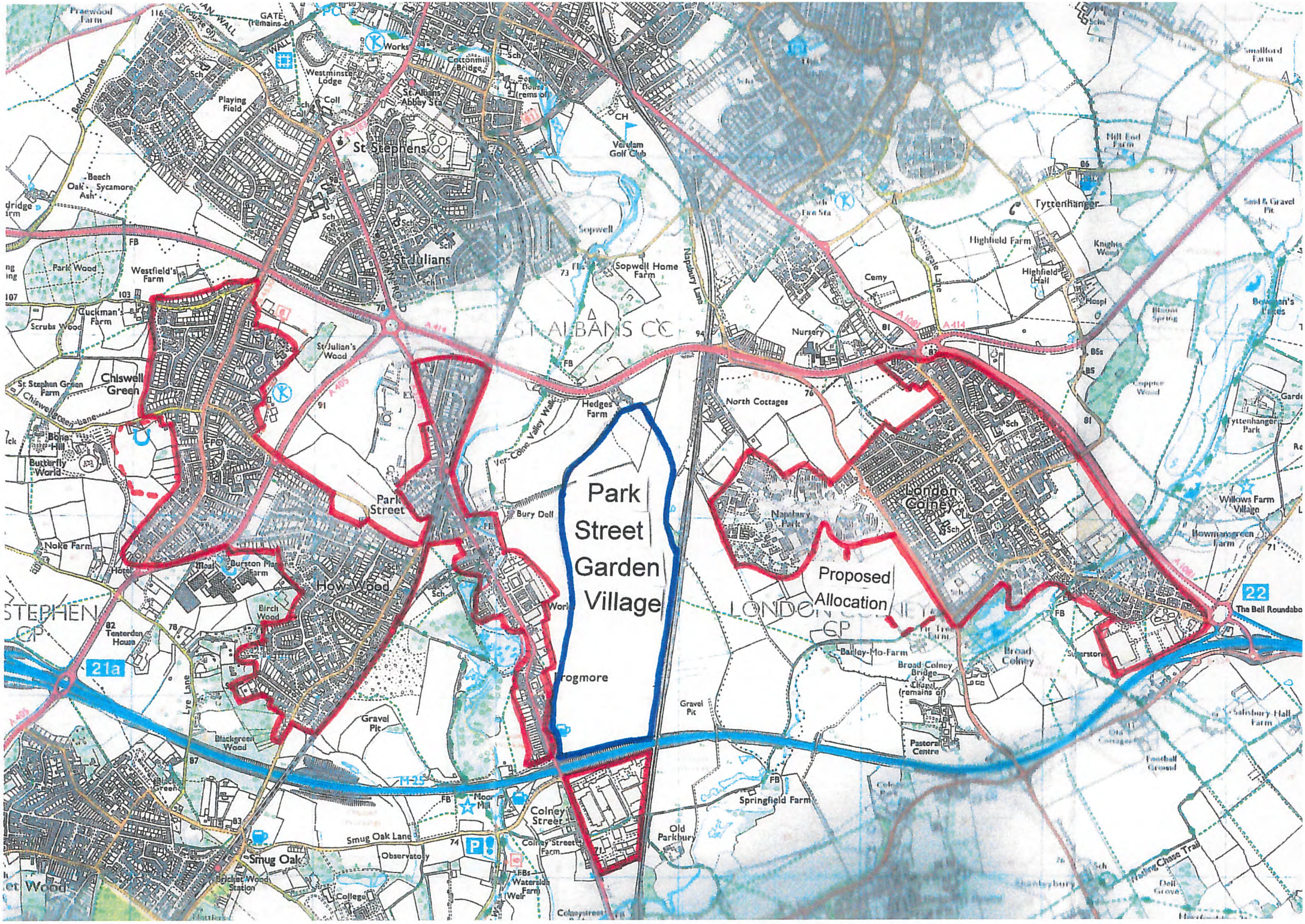
24. The Council should have properly reviewed all brownfield sites within the Distract and assessed their capacity to meet the future development need before embarking upon the release of the Green Belt. The Council has not therefore provided the evidence base which supports the exceptional circumstances concerning the extent of the green field Green Belt releases.

Question 11 – Safeguarding Land

25. The Council has not demonstrated the Green Belt boundaries will not be altered at the end of the Plan period. There is no provision for 'safeguarding' land to meet the longer term development needs beyond the Plan period (the NPPF Paragraph 139 c) and d)). It is acknowledged that part of the housing trajectory (Appendix 2 of the submission plan), 1,835 dwellings may be delivered beyond the Plan period, but that does not truly reflect the extent of land which may be required post-the Plan period. The Council should provide the evidence base to substantiate that it had properly engaged with Paragraph 139 of the NPPF, Items c) and d).

APPENDIX 1

Park Street Garden Village


Park
Street
Garden
Village
Proposed
Allocation
St Stephens
St Julians
Park Street
How Wood
Chiswell Green
London Colney
Tyttenhanger
Colney Street
Smug Oak
Napsbury
Sopwell
Verulam Golf Club
Cottonmill Bridge
Westminster Lodge
St Albans Abbey Sta
Playing Field
Beech
Oak
Sycamore
Ash
Park Wood
Westfield's Farm
Cuckman's Farm
Scrubs Wood
St Julian's Wood
St Stephen Green Farm
Bone Hill
Butterfly World
Noke Farm
Burston Manor Farm
Birch Wood
Tenterden House
Blackgreen Wood
Lye Lane
Gravel Pit
Smug Oak Lane
Observatory
Bricket Wood Station
College
Moor Mill
Colney Street Farm
Waterside Farm
Weir
Old Parkbury
Springfield Farm
Pastoral Centre
Barley-Mo-Farm
Broad Colney Bridge
Broad Colney
Napsbury Park
North Cottages
Nursery
Cemy
Highfield Farm
Highfield Hall
Knights Wood
Nightingale Lane
Napsbury Lane
Sopwell Home Farm
Hedges Farm
Ver-Colne Valley Walk
Bury Dell
Willows Farm Village
Bowmansgreen Farm
Tyttenhanger Park
Salisbury Hall Farm
Hatfield Chase Trail
The Bell Roundabo
ST ALBANS CC
STEPHEN CP
LONDON COLNEY CP
M-25
A 414
A 405
A 1081
21a
22

APPENDIX 2

Site Plan

N

W E

S

MP 16.25

SLs

B 556

B 556

90.2m

BM 92.23m

HARPER LANE

Houndswood House

Yard 13

Yard 14

Harper Lodge Farm

Hound's Wood

Path

Tank

11

10

9

3

4

8.7

6

Yard 15

Yard 16

Yard 17

18

Def

SD

Harper House

Upper Area for Soil Screening

A 5183

MP 16

BM 79.05m

77.1m

Hound's Wood

Scale 1:2500

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APPENDIX 3

3 Aerial Photographs – Harper Lodge Industrial Estate

Harper Lane Industrial Estate
Legend
Google Earth
300 m
N

Radlett
Google Earth
Image Landsat / Copernicus
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
©2017 Google

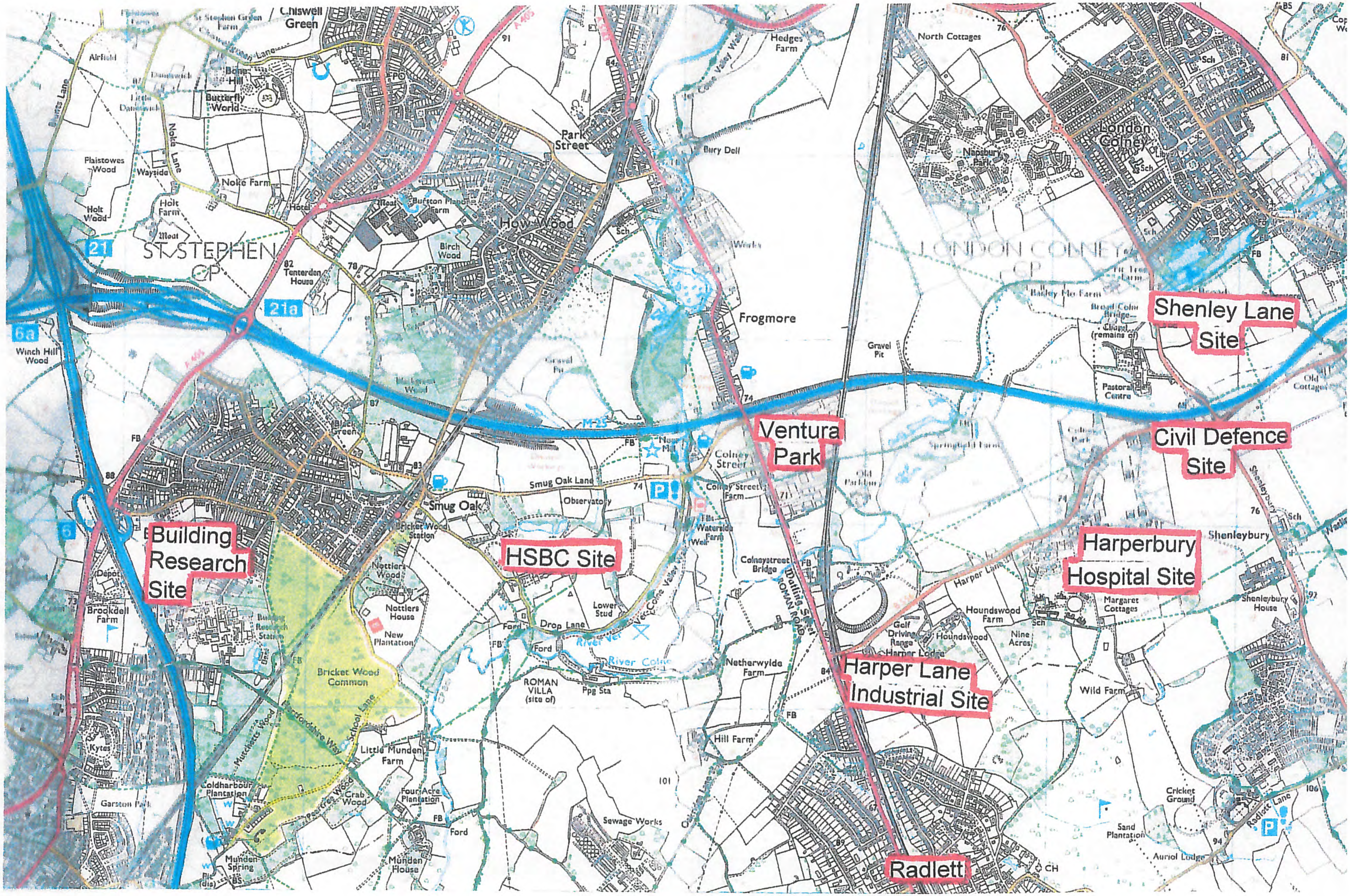
A5183
The Heath
Google Earth
©2017 Google

Radlett
B556
Harperbury
Google Earth
Image Landsat / Copernicus
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
© 2017 Google

Google Earth
©2017 Google

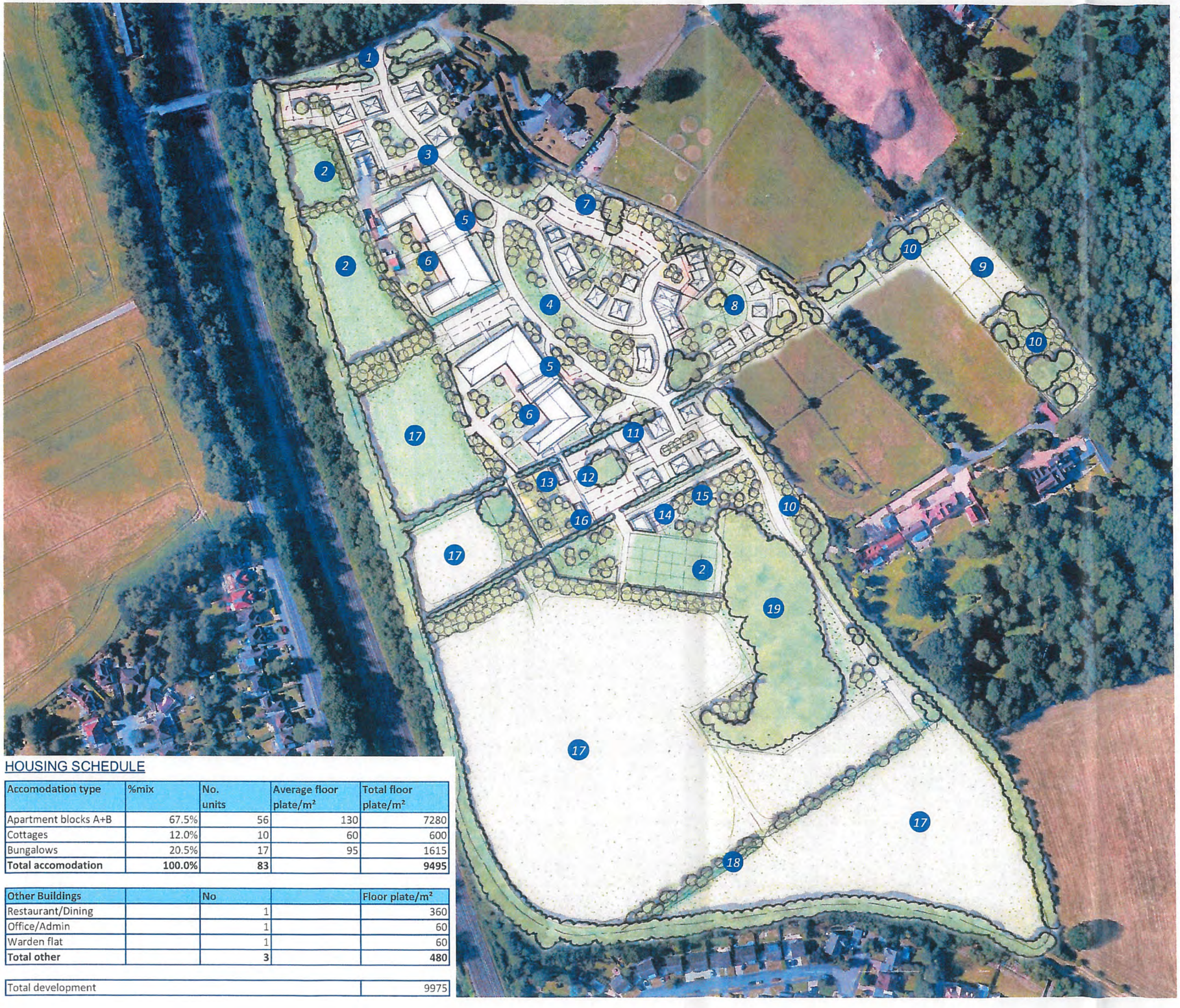
APPENDIX 4

Location Plan


Shenley Lane Site
Civil Defence Site
Harperbury Hospital Site
Ventura Park
HSBC Site
Harper Lane Industrial Site
Building Research Site
Radlett
London Colney
Chiswell Green
Park Street
How Wood
Frogmore
Smug Oak
St Stephen CP
London Colney CP
Bricket Wood Common
Shenleybury
Colney Street
Noke Farm
Butterfly World
Hedges Farm
North Cottages
Bury Dell
Napsbury Park
Netherwylde Farm
Hill Farm
Little Munden Farm
Munden House
Sewage Works
ROMAN VILLA (site of)
River Colne
River Ver
Smug Oak Lane
Observatory
Drop Lane
Houndswood Farm
Wild Farm
Cricket Ground
Sand Plantation
Auriol Lodge
Margaret Cottages
Shenleybury House
Pastoral Centre
Gravel Pit
Winch Hill Wood
Plaistowes Wood
Holt Wood
Holt Farm
Wayside
Airfield
Brockdell Farm
Garston Park
Coldharbour Plantation
Munden Spring
Four Acre Plantation
Crab Wood
Nottlers House
New Plantation
Lower Stud
Nine Acres
Golf Driving Range
Colneystreet Bridge
Birch Wood
Tenterden House
M25
21a
21
6a
6

APPENDIX 5

Retirement Scheme



KEY

1. Entry Landscape
2. Open Space / Pitches
3. Bungalows Facing Central Garden
4. Village "Green"
5. 2 - 2.5 Storey Flats - Parking Under in the Slope
6. West Facing Garden Terraces
7. Parking / West Woodland Edge
8. Green and community Facilities
9. Land Restored to Pasture
10. Woodland Block to Give More Privacy to Existing Homes
11. Mews Cottages / Bungalows
12. Parking to Apartments
13. Allotments
14. Gym & Changing Facilities for Tennis Courts
15. Bowls Green & Garden
16. Kitchen Garden
17. Pasture Land for Horses
18. New Native Hedgerow
19. Woodland Block - brought under management

HOUSING SCHEDULE

Accomodation type	%mix	No. units	Average floor plate/m²	Total floor plate/m²
Apartment blocks A+B	67.5%	56	130	7280
Cottages	12.0%	10	60	600
Bungalows	20.5%	17	95	1615
Total accomodation	**100.0%**	**83**		**9495**

Other Buildings		No		Floor plate/m²
Restaurant/Dining		1		360
Office/Admin		1		60
Warden flat		1		60
Total other		**3**		**480**

Total development	9975

Rev.	Date.	Details.
A	03.10.17	Changes to road layout

Do not scale from this drawing.
All dimensions to be checked on site.
This plan is to be read with all accompanying documentation.
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K. T. Ivory Haulage And Storage

LAND OFF THE B556, HARPER LODGE FARM, RETIREMENT LIVING

Job Code:	OS License Number:		
39643	100017734		
Drawing Scale:	**Date:**	**Drawn By:**	**Checked By:**
NTRS	25.09.17	HD/EL	JC
Drawing Number:			**Revision:**
UDS39643-A3-0102			A

APPENDIX 6

Private/Affordable Housing

KEY

1. Entry and Walling
2. Group of four 5/6 bed homes
3. Local Green
4. Small Local Garden
5. Pitches/Open Space
6. Allotments
7. Attenuations Features
8. New Woodland Blocks
9. Woodland Block - brought under management
10. Visitor Parking

HOUSING SCHEDULE

Bed no.	Mix %	No units	Average floor plate m²	Total floor plate m²
2-bed	30%	28	85	2380
3-bed	40%	39	110	4290
4-bed	30%	28	120	3360
Total	100%	95	105.5	10,030

Rev.	Date.	Details.
A	03.10.17	Changes to housing layout

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K. T. Ivory Haulage And Storage

LAND OFF THE B556, HARPER LODGE FARM, RESIDENTIAL HOUSING

Job Code:	OS License Number:		
39643	100017734		
Drawing Scale:	Date:	Drawn By:	Checked By:
NTRS	25.09.17	HD/EL	JC
Drawing Number:			Revision:
UDS39643-A3-0101			A

APPENDIX 7

Aerial Photograph – Shenley Lane

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and