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Dear Sir / Madam,

**Land East and West of Miriam Lane
Regulation 19 Local Plan Representations
Site ID: L3**

Introduction

These representations have been prepared by Savills, on behalf of Acre St Albans Ltd ('Acre' or 'the Site Promoter') in response to the St Alban's District Council ('SADC') Regulation 19 Draft Replacement Local Plan ('DRLP') (2023-2041) consultation. The DRLP sets out the policies and allocations that will guide how new development and infrastructure comes forward in the Borough for the next 17 years up to 2041.

These representations seek to, firstly, provide general, high-level commentary on the provisions of the DRLP and, crucially, set out Acre's thoughts on the proposed allocation at '*East and West of Miriam Lane*' to reflect Acre's control of the site and interest as Site Promoter.

The Regulation 19 Local Plan – General Provisions

Acre is supportive of the preparation of a new, up-to-date Local Plan to direct appropriate growth to suitable areas and deliver much-needed new housing. On a more site-specific level, Acre is supportive of the allocation of the site known as '*East and West of Miriam Lane*' for residential uses with detailed representations on the site's draft allocation provided later on in this letter.

However, Acre has some strong concerns on the proposed spatial strategy underpinning the emerging local Plan and the approach to dealing with housing need and supply which raises serious questions on the soundness of the DRLP in accordance with Paragraph 35 of the NPPF.

A fundamental concern is that the DRLP is not positively prepared and does not address the extent of unmet housing need within both the private market, affordable housing and custom / self-build tenures. It does not provide adequate contingency and relies too heavily on speculative windfall sites and a small number of strategic growth locations. This emphasises the need to allocate more land for much-needed residential development.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Arguably, the planning reforms proposed by the new Labour Government in the draft National Planning Policy Framework (which reinstates the importance of the standard methodology as the baseline for measuring housing need as part of the Local Plan process and the publication of the revised method for calculating housing need), makes these issues are all the more pressing.

Similarly, the authority's critical undersupply of housing land which is currently at 1.7 years¹ against the four-year requirement as set out in the December 2023 NPPF amendments confirms the above. In this way, there is a requirement to plan positively and address years of chronic undersupply.

In the interest of clarity, the identified concerns in relation to housing numbers, spatial approach and specific planning policies are set out below briefly for the avoidance of doubt.

Approach to Housing Numbers

A key concern which has been carried through from Regulation 18 stage relates to housing targets. In particular, Acre was concerned that the figures for housing need cited in the housing trajectory and the overarching housing targets did not align with the Council's published evidence on housing need set within their own annual monitoring reports from 2022 and 2023. At that stage, the authority's annual monitoring report was projecting a housing requirement over the next 19 years of net. 17800 dwellings, including an enhanced housing target of 1068 dwellings per annum, in the pre-plan period to address historic shortfall of provision. This target had been revised in the 2023 annual monitoring report which outlined that the net 16874 dwellings will be required over the next 17 years, which equates to a net requirement for 993 dwellings per annum on a recurring basis.

As part of the Regulation 19 Local Plan, the housing target set within the housing trajectory has now been set as 14,603 dwellings per annum – this a net reduction of 493 dwellings per annum from the Regulation 18 Local Plan. Acre wishes to express their objection to this approach which discounts 2271 dwellings from the Council's housing need targets and housing trajectory. This cannot reasonably be accounted for through past delivery as SADC has reported delivery figures of net. 766 combined across the period from 2022/23 and 2023/24, which is a shortfall of 65% against the target of 1068 dpa across the same period.

In this way, it is Acre's position that the baseline housing need cited in Table 3.2 and Policy SP1 and SP3 do not appear to be correct and directly contradict the housing need figures published in the 2022 Annual Monitoring Report equating to a **shortfall of around 2,271 dwellings**.

The Standard Method

The above sentiment is all the more evident when considering that, on 30th July 2025, a letter from the Deputy Prime Minister (Rt Hon Angela Rayner MP) was addressed to all local authority leaders in England. The correspondence indicated that the government intends to reinstate the standard method for assessing housing needs and planning for residential developments, while reversing the broader modifications made to the NPPF in December 2023, which have been detrimental to housing supply.

The Labour Government has determined that merely reverting to the 2018 standard method is inadequate. Therefore, a new standard method is proposed to ensure a substantial and ambitious increase in housing delivery figures for most boroughs and district councils in England, including SADC. This initiative aims to comply with the housing targets established by the Government and to enhance overall housing delivery efforts.

¹ St Albans City and District Authority's Monitoring Report 2023

Draft Policies SP1 and SP3 refer to a local housing need of 885 dpa having been calculated using the current Standard Method. Under the new standard method, SADC housing figures have a substantially increased - 1,544 dpa which is a 75% increase compared with the figure – 885 dpa. The letter from the Deputy Prime Minister also stated that *'local authorities will be expected to make every effort to allocate land in line with their housing need as per the standard method'*.

However, it is unclear how the Council has determined that the housing requirement is the same as the local housing need – the PPG expressly confirms that the Standard Method does *not* identify a housing requirement figure, simply the *minimum* annual housing need. Whilst the PPG gives example of where it might be appropriate to go beyond the bare minimum in terms of housing provision, it confirms that this list is not exhaustive. There are a number of reasons why it is considered that the new Local Plan should seek to deliver a greater number of new homes for the District than the absolute minimum.

Firstly, the PPG is clear that the reason for the imposition of a cap restricting the local housing need figure calculated using the Standard Method is to ensure that this figure is as deliverable as possible. Where the cap is engaged (as is the case in St Albans) it follows that, at the very least, the potential to deliver a greater number of new homes should be explored.

In the case of St Albans, it is considered particularly important to explore a greater number, given the degree to which the cap suppresses the calculation of need for the District. The difference between the capped and uncapped figures for the District is vast: 1,169dpa is the calculation of need without the cap - 32% greater than the capped figure of 885 dpa. Over the plan period, this equates to a difference of 4,828 dwellings.

We note the South West Hertfordshire Local Housing Needs Assessment (2020) (LHMA) which has been undertaken on behalf of the Council and the other South West Hertfordshire Authorities. This stated that *'there are some severe affordability issues in South West Hertfordshire'* but concludes there is no requirement to uplift the figures calculated using the Standard Method to account for this, as this is *'addressed through the standard methodology, specifically the 40% uplift'*.

The Updated South West Hertfordshire LHNA, published in March 2024, provided an up-to-date evidence base on overall housing needs in SW Hertfordshire. The analysis demonstrates that the sub-region has undergone sustained and consistent increases in house prices. Currently, these prices present significant barriers for local households attempting to enter the housing market. A decline in affordability, coupled with constrained housing supply, has contributed to a reduction in homeownership rates and a notable incidence of overcrowding in rental accommodations.

As noted above, the 40% uplift represents the cap on the uplift to be applied to calculating the *minimum* housing requirement, and is only in place – as confirmed through the PPG – to maximise deliverability. The requirement to apply a 40% uplift through the Standard Method is reached when the affordability ratio² reaches 10.4. However, in the case of St Albans, affordability is significantly worse. The latest affordability ratio is 18.44 – 77% greater than the number at which the Standard Method's cap is engaged. If the Local Plan is to help address the severe affordability issues in the District, it is critical that the strategy for growth explores providing more homes than the bare minimum, based on a housing figure which would apply if the affordability issues were significantly less severe than they are in the District.

² ONS ratio of median house price to median gross annual workplace-based earnings

Acre therefore raises strong objections to the proposed approach to dealing with housing need and supply. The baseline housing need figures do not appear to be correct equating to a shortfall of circa 2,271 dwellings, the level of housing proposed (Standard Method) does not allow for contingency and is therefore not robust or positively prepared and, finally, the lack of recent delivery and the five year housing land supply position warrant a significantly higher housing requirement.

Spatial Approach

The Spatial Strategy of the plan appears to heavily rely on a small number of strategic sites (4 in total) and fails to allocate a sufficient number of smaller and medium scale housing sites (19). Similarly, there are only 3 proposed allocations within the large site category (ranging between 100-249 homes). It is Acre's position that SADC should consider the difficulties associated with the delivery of large sites. Generally, these are more complicated to deliver and have a longer lead in time before the first housing units are brought on site.

Given the inherent difficulties associated with larger sites – multiple landowners, longer timescales associated with delivery, site-wide specific infrastructure works to undertake ahead of delivering new units – it would make sense to, firstly, identify more smaller-medium sites and allocate these for residential development. This would contribute to a sustainable pattern of growth in appropriate locations, ensure that development potential is maximised and contribute to the national aspiration of delivering much-needed new homes.

In addition to this, the 3 large sites identified (which include *'East and West of Miriam Lane'*) should be maximised and a proper site capacity assessment should be undertaken to establish whether these sites are being utilised to their full potential. For example, an additional average of approximately 30 units on each site could contribute to approximately 100 additional units to the housing supply and, in the context of the larger sites, would be easier to absorb and embed compared to the smaller sites.

The importance of identifying sustainable opportunities on a spatial scale to deliver more housing is all the more evident when considering that the Regulation 19 Local Plan relies on a large level of housing to come forward as windfall sites. 20% of the total housing supply to come forward on sites which do not have allocations, nor are formally identified is not positively prepared and represents an outlier compared to neighbouring authorities. We consider the proportion of windfall sites to be wholly inappropriate given the borough's historic poor delivery and acute housing need.

Planning Policies – Biodiversity Net Gain

As set out above, the Site Promoter does not wish to comment on specific policies in the Regulation 19 Local Plan. However, given that Mandatory Biodiversity Net Gain (BNG) came into effect for major applications on 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), Acre wishes to provide a response in relation to draft Policy NEB6 (Biodiversity and Biodiversity Net Gain).

In summary, Acre is supportive of the overarching objective for delivery of tangible enhancements to biodiversity and ecology as part of new developments. However, Acre queries the reference to onsite reprovision of all habitat types as outlined in the draft policy, *"Off-site habitat creation and / or enhancement contributions will be allowed only where on-site is not possible or desirable and these should be within the District wherever possible"*. In the decision to allocate housing sites, or consideration of applications for new housing, the authority has to balance the inevitable loss of grassland habitats against the need to deliver new housing to meet the needs of the local community. The draft policy should acknowledge that losses to certain

habitat typologies are necessary to delivery housing and development should be supported where it can be demonstrated that proposals will result in delivery of tangible gains to ecology.

It is not uncommon for developers to struggle to deliver a 10% on greenfield sites as they have a particularly high baseline. The BNG section of the above policy states that off-site contributions in the District will be allowed only where on-site is not possible or desirable.

In the first instance, it should be clarified what the Council deem to be 'not possible or desirable', for example an unavoidable loss of a high priority habitat or making a scheme financially unviable. Secondly, there is no statutory requirement for off-site contributions to be delivered within the District and as such this requirement should be removed from the policy.

Land East and West of Miriam Lane (Site ID: L3)

Update and Site Status

As set out earlier on in this statement, Acre is in the process of acquiring a legal interest in the site known as 'East and West of Miriam Lane' and is looking to redevelop the site to deliver residential units, a care home, provision of new access points, private and communal amenity spaces, parking, cycle parking, enhanced public realm and landscaping and relevant infrastructure works.

At present, Acre is in process of engaging in formal pre-application discussions with the authority with submission of a formal planning application forecasted for Spring 2025. The proposals being developed at the site actively respond to the site constraints and emerging planning policy position on site and seek to make full use of an under-utilised and readily available site. An important element informing the proposals at the site is the emerging residential allocation proposed in the Regulation 19 Local Plan. It is Acre's intention to safeguard this and proposed amendments to the draft site specific policy text are set out below in the interest of securing a deliverable allocation which reflects the work to date and reconciles the planning policy position with the development status of the site.

The Site

Given its draft allocation in the Regulation 19 Local Plan, officers will be familiar with the site and surrounding context. For ease of reference, a brief overview is provided below.

The site is approximately 6.5 hectares and is outlined in red in Figure 1 below. It comprises both greenfield land which is made up of smaller parcels which are bounded by trees and previously developed land comprising the hotel and car park. Miriam Lane runs north to south through the land parcel.

The hotel no longer operates as a commercial hotel. The area surrounding the site to the north is made up of predominantly residential uses as well as open fields to the north-west. To the east of the site, on the opposite side of the North Orbital Road, sits an industrial park comprising of garden centres and a gym. To the south, the site is bounded by Noke Lane. Finally, to the west, the site is bounded by an existing garage and open fields past this.



Figure 1: Site Location.

There are no statutory or locally listed buildings within the site boundary. The site is also not located within a Conservation Area or Archaeological Priority Area.

The Environment Agency mapping system shows the majority of the Site to be within Flood Zone 1 which has the lowest probability of fluvial / tidal flooding.

The site is covered by an area Tree Preservation Order (TPO) to the south of the site. This relates to all broad-leaved and coniferous trees within the site (TPO1868). There are a further two TPOs at the site which include a number of individual trees as set out below:

- TPO1408 covering four trees; and
- TPO1653 covering eight lime trees.

The site is located to the west of How Wood, and North of Bricket Wood, a village of 4,000 people. It is also located approximately 2.5 miles south of St Albans, which benefits from a good range of services and facilities. These include schools, convenience stores, sports pitches, church, a variety of public houses and eateries and public open space.

The site is well placed in terms of transport with Nokes Lane south of the site connecting to North Orbital Road to the east providing links to the M25. The site is within a 7 minute drive to St Albans. St Albans Station (to the North of the site) offers direct services to London, via the Thameslink (41 minutes). The site is also approximately 1.5 miles from How Wood Station. This offers Northwestern Railway Abbey Line services, which travel between St. Albans Abbey and Watford Junction.

The above demonstrates that the site is sustainably located and benefits from good accessibility to a range of facilities and services.

Adopted Planning Policy Position

Within the adopted Local Plan, the site is covered by the following designations:

- Partially within the metropolitan Green Belt (Parcel 25, Sub-Areas: SA-134, SA-135, SA-136 as designated in the St Albans Stage 2 Green Belt Review [June 2023]) and partially within the built up area;

- Within an area of Special Control for Advertisements; and
- Within the St Stephen Neighbourhood Plan Area.

Regulation 19 Local Plan – Allocation LD3 General Provisions

As part of the Site Allocations Document, Acre notes and welcomes the proposed allocation at the site under Site ID L3 (*‘East and West of Miriam Lane, Chiswell Green, AL2 3NY’*). The emerging allocation seeks to allocate the site for approximately 101 residential units. This represents an increase from the 98 units proposed in the Draft M1 Allocation at Regulation 18 Stage. Acre fully supports the retained allocation at the site from Regulation 18 stage but – in light of the information discussed in the first section of this letter – requests that the site capacity is increased to reflect the development potential of the site.

As part of the draft allocation, 7 key development requirements are proposed. These are reproduced in this letter and addressed in turn. Acre has every commitment to deliver high quality development which respects the site's location and constraints however, the detail in the criteria appears unclear at points. The next section of this letter firstly sets out Acre's position with respect to proposed units numbers at the site and then makes suggestions on refining the scope of the 7 key development requirements. This seeks to, firstly, encourage the delivery of sustainable development and, secondly, appropriately define the responsibilities of the developer should the site be formally allocated.

Housing Numbers

As part of the Regulation 18 Consultation which closed in September 2023, the western parcel of the site (measuring approximately 4.08ha and included at **Appendix 1** of this letter) was identified as a draft allocation. Under draft allocation M1 of the Regulation 18 consultation, the site was allocated for the residential development of 98 units.

The draft allocation of the site has been carried through to the Regulation 19 Consultation (as identified at **Appendix 2**) of this cover letter with some key updates including:

- The draft allocation extending to include the former hotel site as well as the original western greenfield parcel;
- An uplift in units to circa 101; and
- Further development considerations as addressed later on in this letter.

As part of the Regulation 18 Local Plan, a total of 91 units were proposed on 4.08ha of land resulting in an overall of 22.3 dwellings per hectare (this is a crude measurement and assumes the entire parcel of land constitutes of net developable land which is not the case). The Regulation 19 Local Plan Policy LG4 (Large, Medium and Small Sites) states that proposals must *‘make effective use of the site, with a minimum overall net density of 40 dwellings per hectare, taking into account adjacent character, uses and identity’*. It is not clear why the full 40dph calculation has not been applied to the site but the Site Promoter assumes that this is due to the site's proximity to the areas of land which would still be retained within the Metropolitan Green Belt.

On the basis of the above calculation, and using the same dwellings per hectare ratio, it would make sense for the 6.02 area of land allocated under the Regulation 19 Local Plan (as the allocation has been revised to include the former hotel site) to be allocated for approximately 136 dwellings. However, and disappointingly, the Regulation 19 Local Plan Draft allocates the extended site for only 101 units providing an uplift of only three units from the Regulation 18 Local Plan.

In light of the shortfalls identified with the plan in relation to housing numbers, it is evident that providing an uplift on medium-large sites such as this one would be an efficient solution to boost supply. It is Acre's position that the wording of the allocation should be revised to increase the number of units to read '*140 residential units*' to be in line with the development density proposed at Regulation 18 stage at the very minimum and the ongoing development progress at the site. In addition to this, the overall density of the site should be re-considered to see if there is scope for an uplift to a dph which is more in line with the policy compliant 40dpw set out in draft Regulation 19 Policy LG4 (Large, Medium and Small Sites).

In this way, whilst Acre supports the residential allocation of the site, **an uplift in residential units** is essential. This is all the more evident when considering that the additional Regulation 19 parcel consists of the previously developed hotel site. In accordance with National Policy, the potential of previously developed land should be maximised and it is considered that the previously developed parcel of the scheme could be allocated for a significantly larger number of units.

In addition to the provision of residential dwellings, the emerging allocation should be amended to include specific reference to the provision of a care home on the site (Class C2 and C3) as this would reflect the proposed scheme and provide a complementary and appropriate use to standard residential development. It would also assist in meeting a specific need for older person accommodation in the District.

Key Development Requirements

We have set out our observations on the key development requirements in the draft site specific policy below. It is considered that some of these are either unclear or too onerous in relation to the development proposed. For this reason, when necessary, replacement wording is proposed and summarised in **Appendix 3** of this cover letter.

Key Development Requirement 1

This requirement states that development needs to '*take appropriate account of Miriam Lane, which is a private road running through the site*'. It is not clear why this wording is necessary or needed and it is requested that it is deleted as it is a matter that can be dealt with through the detailed design and layout of a scheme at planning application stage. That said, we can confirm that appropriate consideration has been given to Miriam Lane in the proposed scheme layout.

Key Development Requirement 2

This requirement states that '*footpath access along Noke Lane and alongside the North Orbital to Watford is narrow, and development must provide new or make sufficient contributions to make improvements to the existing highways, including widening, providing safety, and sufficient lighting*'. The Site Promoter confirms that the details of this requirements are noted and Acre is happy to deliver the widening of the footpath and provision of street lighting along the main site frontages within their control. It should therefore be made expressly clear in the policy wording that this requirement does not extend beyond the boundaries of the site along Noke Lane or the North Orbital Road as this would be onerous and outside of their control.

Key Development Requirement 3

This requirement states that '*enhanced pedestrian and cycle connectivity to services and facilities in Chiswell Green are required, along with connectivity to public transport services to St Albans and Watford*'. The Site

Promoter accepts that, as part of the scheme, some active travel links enhancements will be necessary and is committed to the delivery of these. However, it is Acre's position that Key Development Requirement 3, in its current format, is too vague and risks placing unreasonable and / or onerous requirements on the developer threatening the viability of the scheme. We would therefore request that requirement 3 is deleted and incorporated within key development requirement 4 which identifies specific routes for connections requiring improvement. Acre is willing to discuss with the highway authority to refine the extent of the improvements required as part of any Section 278 works following the grant of any planning permission on-site.

Key Development Requirement 4

This requirement states that *'contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. Including improvements to the LCWIP route between the site and St Albans, and between the site and Watford.'* This Key Development Requirement refers to development contributions / enhancements to support relevant schemes in the Local Cycling and Walking Infrastructure Plan (LCWIP). This includes improvements to the LCWIP route between the site and St Albans, and between the site and Watford. In the interest of clarity, the full extent of obligations required is set out in **Appendix 4** of this cover letter. The key development requirement is noted and supported in principle subject to the extent of the contributions being reasonable and in accordance with the statutory tests. In light of the detailed nature of the obligations sought under Key Development Requirement 4, the omission of Key Development Requirement 3 would be reasonable as the contributions are addressed in the TIA supporting the draft plan.

Key Development Requirement 5

This requirement states that *'development proposals must take appropriate account of trees covered by Tree Preservation Order within and adjacent to the site'*. A landscape-led approach will be adopted to sensitively integrate the new built form within the existing landscape and safeguard existing features of ecological interest. However, Acre is in the process of undertaking arboricultural survey work which will enable a better understanding of the condition of all trees on the site and which ones should be retained and those that can be removed. For this reason, the condition of the trees, including those covered by Tree Protection Orders, is unknown. A small amendment to the policy text is therefore proposed in **Appendix 3** to read *'development proposals must take appropriate account of trees covered by Tree Preservation Order, dependent on their quality and status, within the site'*. Whilst every effort will be made to account for trees within the wider context of the site, these would not fall under Acre's control so the last part of the policy text should be deleted.

Key Development Requirement 6

Development Requirement 6 states that future development at the site should *'undertake opportunistic extraction of any suitable sand and gravel deposits for use on-site wherever possible, where such deposits are uncovered during construction / excavation works'*. It is Acre's understanding that the site does not fall within a Sand and Gravel Safeguarding designation and is unlikely to be of a sufficient size to support any significant extraction of deposits without a significant impact on existing protected trees on site and surrounding residential amenity. For this reason, this requirement should be deleted. Should the authority consider that the provision of potential sand and gravel extraction essential, this can be controlled via a suitably worded condition – via the development management forum – at the appropriate stage (i.e following the grant of planning permission).

Key Development Requirement 7

Development Requirement 7 states that development should *'take appropriate account of these Environmental Constraints: Source Protection Zone (SPZ)1: Bedrock Aquifer*. Acre understand that Source Protection Zones are identified by the Environment Agency to protect groundwater from developments that may damage its quality. Draft Policy W4 (Groundwater Pollution) of the Regulation 19 Local Plan states that development must take account of the relevant Source advice with regards to the Protection Zone that it lies within. The policy goes on to state that developers must comply with the most up to date guidance provided by the Environment Agency (EA) to safeguard groundwater against pollution and seek the advice of the EA. The Site Promoter notes the sentiment of this requirement and confirms that appropriate consideration will be given to these requirements through the appointment of a Flooding and Drainage consultant on the scheme.

Summary of Key Development Requirements

As set out throughout this cover letter, Acre supports the allocation of the site known as *'East and West of Miriam Lane'* and considers that the site can make an important contribution to local housing needs. The site sits in a sustainable location, is free from constraints and will meet needs and requirements of the district council. In the interest of efficiently delivering the site, the requested amendments to the draft policy wording seek to increase the number of units identified for delivery on the site to ensure an efficient and effective use of the land, clarify the extent of developer contributions and remove uncertainty and ambiguity so that the appropriate enhancements can be secured.

Conclusions and Next Steps

In summary, Acre supports the allocation of the *'East and West of Miriam Lane'* site but objects to a number of the criteria set out in site specific policy wording within the allocation. Amendments have been proposed to the wording which would make it acceptable and these are detailed above and with **Appendix 3**.

'East and West of Miriam Lane' represents an appropriate, sustainable and deliverable allocation in the new Local Plan. This is emphasised by Acre's involvement with the scheme, the pre-application dialogue which is in process of taking place with the authority and the intention to submit a planning application in Spring 2025. Should full planning permission be granted by Autumn 2025, delivery on site could reasonably commence in early 2026. The emerging Local Plan is therefore of significant relevance to Acre and, given the deliverable and readily available nature of the scheme, the site is highly relevant to the LPA's five-year housing land supply and housing pipeline.

In this regard, it is hoped that these representations are considered carefully by SADC to ensure that the Local Plan and the key development requirements for allocations L3 do not present unreasonable challenges or complications to the planning process. SADC should therefore approach site allocations positively and seek the efficient use of site. Addressing the proposed uplift on the allocation and taking on board the changes to the Key Development requirements would go a way toward this and would contribute to the delivery of the site.

If you require any further information, please feel free to contact me or my colleague, Annamaria Sgueglia [REDACTED] of these offices.

Yours sincerely

A solid black rectangular box used to redact the signature of Kieran Wheeler.

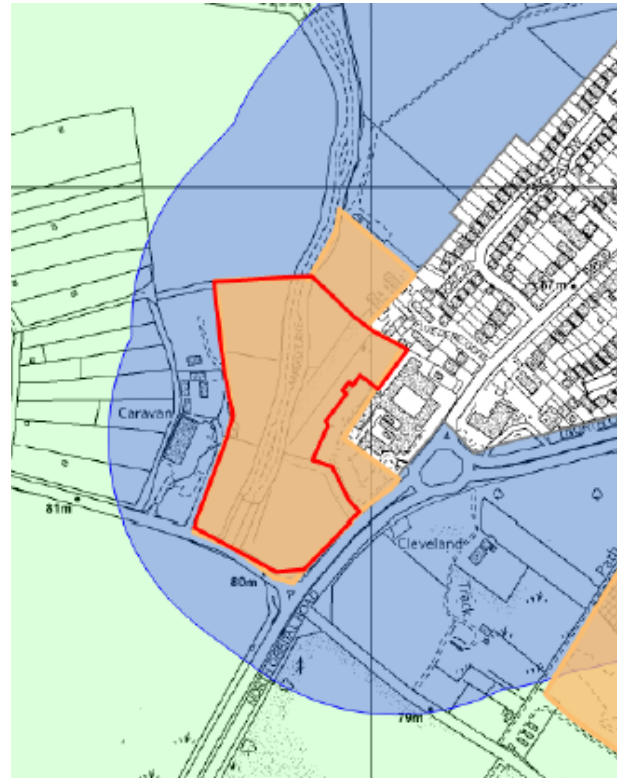
Kieran Wheeler



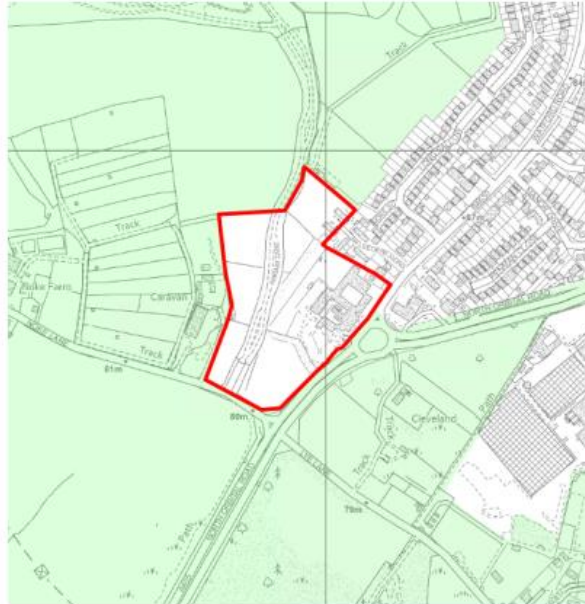
Director

Enc. As above

Appendix 1 – Extract of Draft Allocation from the Regulation 18 Local Plan

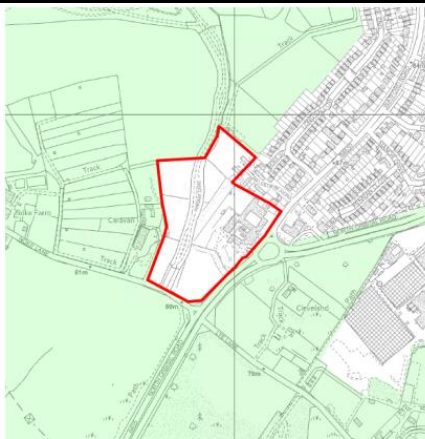





Appendix 2 – Extract of Draft Allocation from Regulation 19 Local Plan



Appendix 3 – Proposed Policy Text

Suggested text in Red.

L3 – East and West of Miriam Lane, Chiswell Green, AL2 3NY		
Parish / Ward	St Stephen	<div>Allocated Site Boundary</div>  <div> District Boundary  Site Boundary  Metropolitan Green Belt</div>
Hectares	6.02	
Proposed Use	Residential 101 units (indicative) 140 residential units and a care home (land use class C2/C3)	
Proforma Ref	C-218	
HELAA Ref	STS-38-18	
Green Belt Sub Area Ref	SA-134 / SA-135 & SA-136 / RA-47 / RC-10	
Key Development Requirements		
<div>1. Take appropriate account of Miriam Lane, which is a private road running through the site.</div> <div>2. Footpath access along Noke Lane and alongside the North Orbital to Watford Road is narrow, and development must provide new or make sufficient contributions to make improvements to the existing highways, including widening, providing safety, and sufficient lighting within the boundaries of the site along Noke Lane and the North Orbital road only.</div> <div>3. Enhanced pedestrian and cycle connectivity to services and facilities in Chiswell Green are required, along with connectivity to public transport services to St Albans and Watford.</div> <div>4. Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. Including improvements to the LCWIP route between the site and St Albans, and between the site and Watford.</div> <div>5. Development proposals must take appropriate account of trees covered by Tree Preservation Order within and adjacent to the site dependent on their quality and status, within the site.</div> <div>6. Undertake opportunistic extraction of any suitable sand and gravel deposits for use on-site wherever possible, where such deposits are uncovered during construction / excavation works.</div> <div>7. Take appropriate account of these Environmental Constraints: Source Protection Zone (SPZ) 1; Bedrock Aquifer.</div>		

Appendix 4 – Indicative Transport Contributions in the TIA

Sustainable Travel for Southern Villages (Indicative Contributions)

The TIA supporting the Regulation 19 Consultation states that the site will make significant contributions to Sustainable Travel for the Southern Villages. The indicative contribution total was based on the Regulation 18 total of 98 units x £6,8264 (HCC developer contributions) = £669,000.

The TIA goes on to state that this would be attributed as follows:

- LCWIP SCHEME 11 & GTP - Strategic Rail freight Interchange & A414 - Indicative Contribution £669,000
 - North Orbital Road - Centre (A414)
 - A414 cycling - SC GTP - SM 181 (London Colney - Hatfield)
 - A414 cycling - SW GTP - PR22 (HGC - Park Street)
 - A414 cycling - SC GTP - SM207 (Park Street - London Colney).

Other Transport and Access Contributions (Indicative)

The TIA also provides other transport and access contributions as well as development parameters which are replicated in the draft allocation. These include:

- Logical enhancement of the area alongside site L1 to enhance connectivity at the junction and to services and facilities in the current settlement will need to be shown, along with connectivity to St Albans;
- Contributions/enhancements are likely to be required to support relevant schemes in the LCWIP and GTPs – including improvements identified in a recent Cycling Connectivity Study and the LCWIP route between the site and St Albans, and between the site and Watford;
- Miriam Lane is a private road running through the site;
- Footpath access along Noke Lane and alongside the North Orbital to Watford Road is narrow, and development must provide new or make sufficient contributions to make improvements to the existing highways, including widening, providing safety, and sufficient lighting;
- Onsite transport and access arrangements as required by HCC and SADC policy;
- Public transport contributions as required by HCC.

Draft Local Plan Policy Transport Indicative Contributions

- E-bike Scheme – estimated £98,000 (£1,000 per unit);
- Car Club – estimated £98,000 (£1,000 per unit).