

WOOLLAM PARK
NORTH ST ALBANS
APPLICANTS' POSITION PAPER
MARCH 2026

Background

1. Planning application 5/2023/2271 was registered on the 26th February 2025.
2. The parties have agreed to evaluate progress with the determination of the application in spring 2026.
3. The applicants and the LPA have been working together pursuant to an extension to the PPA.
4. The current statutory period for determination has been extended until the 31st July 2026.

Scheme amendments

5. The applicants submitted amendments to the scheme on the 31st October 2025 (the "October" submission).
6. To account for certain matters that have arisen from consultation responses and discussions the parameter plans have been further amended as follows:
 - (1) A set back from the Harpenden Road access to increase landscaping;
 - (2) An additional active travel link in Parcel C3, north of Sandridgebury Lane; and
 - (3) Relocating the proposed gate to The Greens a short distance north (this is shown on the playing field scheme drawings).
7. These plans are included at Annex 1.
8. The above slight alterations do not change the basis of the scheme assessment in the Environmental Statement.

Consultation Responses

9. We discussed the various consultation responses at our meeting on the 15th December 2025.
10. The applicants' understanding is that the following consultation responses do not require any further submission from the applicants and none amount to an objection to the proposed development.

Affinity Water (19th November 2025)

Environment Agency (11th December 2025)

HCC County Archaeologist* (18th March 2025 and 1st December 2025)

HCC Ecology (25th June 2025)

HCC Growth and Infrastructure Team (25th April 2025 and 12th December 2025)

HCC Minerals and Waste (10th March 2025)

Hertfordshire Fire and Rescue (2nd July 2025)

Hertfordshire Constabulary (12th May 2025)

Natural England (24th March 2025)

Network Rail (16th May 2025)

NHS East England Ambulance Service (26th March 2025 and 2nd December 2025)

NHS Integrated Care Board (11th April 2025)

Police Crime Prevention Officer (25th April 2025)

SADC Urban Design (Gary Colligan obo SADC) (7th May 2025 and 25th November 2025)

SADC Green Spaces / Leisure (9th June 2025)

SADC Environmental Heath Officer (17th March 2025)

SADC Housing Officer (4th April 2025)

Thames Water (17th March 2025)

*There have been on-going discussions with the County Archaeologist who has suggested a series of planning conditions relating to archaeological investigations. The applicants are nevertheless considering whether to progress the archaeological trial trending for the playing field scheme and are preparing a Written Scheme of Investigation presently.

Planning Conditions and Obligations

9. Some of these consultation responses refer to planning conditions and obligations.
10. We discussed the likely scope of planning conditions when we met on the 15th December 2025. At *Annex 2* is a without prejudice list of suggested planning conditions for discussion.
11. Furthermore, as we discussed we have instructed solicitors – Bickley Martin. The LPA has instructed Pinsent Mason. As discussed, we have prepared a more detailed heads of terms and these are attached at *Annex 3* as the basis for the lawyers to progress a draft of the agreement.

Allotments

12. The Spatial Planning Team's comments are framed as a neutral response. The single point that is raised in its most recent response is concerning allotment provision. The applicants' approach is set out in its submission; they favour community grow spaces over allotments.
13. The public realm and landscape design principles are shown on pages 142-152, on Figure 30 and elsewhere. This concept is derived from the vision for this new

community and meeting the needs of its resident population. Allotments, on the other hand—conventionally owned, managed and leased by the Local Authority—would be a different proposition.

14. We accept that there is a shortage in this typology as shown on Figure 69 of the Design and Access Statement but an overprovision of Amenity Green Space (148%), Natural and semi-natural green spaces (113%) and (171%) as well as children's and teenage areas (125% and 114% respectively). In overall terms, the land use parameter plan which illustrates the extent of Green Infrastructure exceeds those standards.
15. In principle, it would be possible therefore to repurpose certain other typologies to achieve an addition 0.41 hectares of productive landscape / allotments. We are currently assessing the biodiversity net gain effect of this.

On-going work

16. Other consultation responses where further work is in hand are discussed below.
17. HCC Landscape Officer: Additional clarification has been requested in response the 31st October 2025 submission. A response accompanies this Position Statement at Annex 4, which includes an explanatory note in relation to the assessment of visual effects from Sandriedgebury Lane.
18. Note we have amended the depth of landscaping adjacent to Harpenden Road on the parameter plan to achieve a greater set back between the public highway and the frontage of new dwellings.
19. Local Highway Authority: The LHA's letter of the 7th October 2025 concludes that: "*There are still several areas that require further discussion to resolve specific issues, but at this stage in the process we have not found reasons to object to the proposal.*" You will be aware of those further discussions and following the most recent meeting on the 11th March 2026, the applicants propose a further submission in relation to access and movement to draw these various work streams together.
20. In this regard we are submitting the off-site highway improvements schemes that have been discussed with HCC – see Annex 5. These have been designed to a level to illustrate their feasibility but are not engineering drawings that would be required pursuant to a Section 278 Agreement. The delivery of these routes would be subject to planning agreement or obligation. We have also considered whether these works would give rise to significant environmental effects.
21. Active Travel England: ATE has suggested that determination of the application is deferred pending further consideration of improvements (26th March 2025 and 17th December 2025). Those are matters that are being progressed directly with the Local Highway Authority.
22. Public Rights of Way: We have been provided with comments from the Public Rights of Way team, which are focused on planning obligations to improve the local public rights of way network. A meeting was held with relevant officers on the 8th January 2026. The applicants are not persuaded by certain of these requests for monies and the PROW has still to provide a realistic scheme for improvements to Sandridge 009.
23. The Applicants' proposition is as follows:

- (a) to lay out a route within the Site from Sandridgbury Lane to the Hertfordshire Way that could be adopted as a bridleway, in accordance with HCC's specification.
 - (b) to pay a financial contribution to HCC to fund improvements to Sandridge 009 (bridleway) east of the railway line to Heartwood Forest, subject to HCC demonstrating that a deliverable and viable scheme for those improvements can be provided.
 - (c) To relocate and improve the permissive path on the north side of Long Spring Wood
 - (d) To improve the surface treatment of the FP96 (footpath) within Long Spring Wood (a no dig boardwalk type feature)
24. Measures (a) and (b) reflect Policy B1 of the emerging Local Plan. Measure (c) accords with the intention to maintain a 15m buffer to the ancient woodland. Measure (d) accords with the ecological management principles proposed for the ancient woodland.
25. Lead Local Flood Authority: The applicants and LLFA met on the 5th December 2025 to discuss the material in the October submission prepared in response to their earlier consultation response (27th March 2025). Following this meeting, the LLFA wrote to the applicants requesting further information as regards the 1-30 year event (15th December 2025). The LLFA also identified what detailed drawings would be required for compliance-based conditions for the playing field element of the application. This information is submitted alongside this Position Statement (*Annex 6*).
26. Sport England: There are no substantive points raised in Sport England's letter of the 19th November 2025. We are currently discussing compliance-based conditions with Sport England.
27. Affordable Housing: Whilst the affordable housing officer's comments (4th April 2025) support the proposed development, as part of the S106 discussion we will need to consider matters relating to tenure and mix and in particular address the issue of assisted housing / age restricted.
28. HCC Growth and Infrastructure: This response (25th April 2025 and 12th December 2025) concern various areas that are the responsibility of the County Council. They are concerned directly with planning obligations. The applicants and HCC are meeting on the 18th March 2026 to discuss those obligations.
28. Contaminated Land Officer: This response (17 March 2025) confirms a low to moderate contamination risk across the site and recommends a Phase II investigation, to be secured by condition. The applicant has prepared a Phase II investigation for the playing field element of the application (*Annex 7*), which confirms that the site is considered suitable for the proposed development, with no abnormal ground conditions or contamination constraints identified. No further geo-environmental work is recommended, aside from a standard watching brief during construction works which can be secured via planning condition.

Stewardship Strategy

29. This was discussed at our meeting in the 15th December 2025. The applicants are not seeking approval of a specific stewardship model or scheme at this point in time. Instead, they have prepared a Stewardship Strategy, included at *Annex 8*, which expands upon the detail contained within the Design and Access Statement.

Creation of the Long-term Stewardship Scheme

30. This Developer will be obliged under the Section 106 agreement to prepare and submit for approved a Stewardship Scheme prior to the grant of detailed planning permission. The Stewardship Scheme will detail the intended stewardship model, organisational structure, scope of responsibilities, income and expenditure model, the estate management role, the potential relationship with St Albans School, and the detailed facilities to be provided across the development.

Establishment of the Stewardship Body

31. The associated Stewardship body will be established in a form agreed with the Local Authority prior to first occupation. Its structure will include mechanisms for the ongoing management, control and funding of the stewardship arrangements; operation of the Community Hub and/or mobility hub; commitments for the management of green infrastructure in accordance with the Landscape and Ecology Management Plan; and processes that enable residents to clearly understand how the public areas of Woollam Park will be managed.
32. These two stages, secured through the Section 106 agreement, ensure that a robust, transparent and well-resourced stewardship framework is in place from the outset and capable of supporting the long-term success of the new community.

Objections

33. We are aware of representations that object to the proposed development. The District Council will need to consider those, which to a large extent centre of the principle of the proposed development, the Green Belt, very special circumstances and Policy 1 of the 1994 Local Plan, and traffic and infrastructure matters, alongside the position of other consultees, and the progress with the weight to be afforded to the emerging Local Plan and application of paragraph 11 of the NPPF.
34. Of note are consultation responses from Forestry Commission, the Hertfordshire and Middlesex Wildlife Trust and the Woodland Trust. Each are opposed to the applicants having adopted the Government's standing advice for the off-set to Longspring Wood. We contrast this with the view taken by the County Council's ecologist who is satisfied with the extent of separation and proposes conditions to ensure appropriate management and maintenance of this and other ecological features. It is instructive to note that the arrangement of land uses across the site was subject to considerable pre-application discussions which included the County Council's ecologist.
35. The Woodland Trust also raise consideration of effects at Heartwood Forest and the applicants have met with them regarding this.
36. Lastly, we note the comments from the two local campaign groups Save North St Albans and Save our Sandridge. The District Council will need to consider the points

raised therein alongside other consultation responses, including the County Council's ecologist, the Lead Local Flood Authority, the Local Highway Authority.

The emerging Local Plan

37. We are aware that the District Council has received the Local Plan Examiners' Post Hearing Letter (dated the 15th January 2026). That letter provides the Examiners view of as to the "*direction on remaining matters of soundness*". None of the matters set out in that correspondence relate to the principle of the proposed allocation at B1.
38. We understand that the Examiners' comments do not represent their full or final conclusions on the matters raised, or on the soundness of the Plan overall, which shall be set out in the final Report. However, it nevertheless provides a clear indication of the substantive matters that the Council need to address through main modifications.
39. The Council may propose main modifications to aspect of the plan that have a bearing on the proposed development (for example, the wording of LG1 and B1) but it is not readily apparent that the main modifications are intended to adopt a profoundly different approach to development at North St Albans from that in the submitted plan. The applicants' view this as a notably important position as regards the principle of development at North St Albans.

Owen Jones

20th March 2026

List of Annexures

Annex 1	Revised Parameter Plans and Playing Pitch Scheme
Annex 2	Draft Planning Conditions for discussion
Annex 3	Revised Draft list of Heads of Terms
Annex 4	Supplementary landscape and visual assessment material
Annex 5	Off-site pedestrian and cycle improvements
Annex 6	Submission to Lead Local Flood Authority
Annex 7	Phase I Review & Phase II Geo-Environmental Assessment for Playing Pitches
Annex 8	Stewardship Strategy

Documents submitted March 2026

1. Position Statement
2. Parameter Plans
3. Playing Field Scheme
4. Off-site active travel improvements (Route 1A, Route 1B, Route 2 and Route 3)
5. Active Travel England Audit (Technical Note, Audit Sheets Route 1A, Route 1B, Route 2 and Route 3)
6. Healthy Streets Audit (Technical Note, Audit Sheets)
7. Revised Framework Travel Plan
8. Stage 1 Road Safety Audit and Designer's Response
9. PJA response to Local Lead Flood Authority
10. Hydraulic Modelling Addendum
11. Sandridgebury Lane Flood Risk Summary Note
12. Sewell Park Flood Risk Summary Note
13. Environmental Statement Note: Landscape and Visual Assessment Sandridgebury Lane
14. Environmental Statement Note: Predicted effects of off-site active travel improvements
15. Planning Statement Note: Green Belt Compensation Strategy
16. Suggested Planning Conditions for discussion with LPA
17. Revised Draft Heads of Terms for planning obligations for discussion with LPA/HCC
18. Woollam Park Stewardship Strategy
19. Groundwater Monitoring Summary Note
20. Phase I Review and Phase II Geo-environmental assessment of Playing Pitches
21. Harpenden Road Design Statement