



Formal Objection Letter

planning application reference 5/2025/1556

Save Our Sandridge (SOS)

1 Shottfield Close
Sandridge
St Albans
Hertfordshire
AL4 9EA
Contact@SaveOurSandridge.uk

To:

Planning Department
St Albans City & District Council
St Peters Street
St Albans
Hertfordshire AL1 3JE

Date – 11th November 2025

OBJECTION TO PLANNING APPLICATION [5/2025/1556]

Site: Land Rear of Shottfield Close Sandridge Hertfordshire
Outline planning application (with all matters reserved except means of access from Shottfield Close) for residential development (Use Class C3) with associated landscaping, parking and ancillary works.

1.Introduction

This formal consultation response is submitted in objection to planning application **5/2025/1556** for the proposed residential development of **84 dwellings** on Green Belt land located to the **rear of Shottfield Close, Sandridge**.

The submission is made on behalf of the **Save Our Sandridge (SOS) Campaign Group** a non-political community group representing residents of Sandridge village and the surrounding area. We are committed to protecting the character, heritage, and environmental integrity of our parish and ensuring that new development occurs only in sustainable, policy-compliant locations supported by adequate infrastructure.

The SOS Campaign Group fully supports the need for appropriate and sustainable housing delivery within the district, including the provision of affordable homes. However, this must be achieved through a plan-led approach, with development directed towards sites that are sustainable, deliverable, and compliant with national and local planning policy frameworks. The proposed development fails to meet these tests and would result in a range of significant adverse and irreversible impacts, which are outlined in detail within this objection.

Across St Albans District, residents have too often seen outline planning permissions granted without full or accurate information at the decision stage. Time and again, critical details



Formal Objection Letter

planning application reference 5/2025/1556

have emerged only after approval — revealing errors, omissions, and unfulfilled commitments that leave communities to deal with the consequences. This pattern undermines confidence, weakens accountability, and erodes trust in a planning system that should protect, not overlook, the people it serves.

Executive Summary

Save Our Sandridge (SOS) strongly objects to Planning Application 5/2025/1556 for 84 dwellings on Green Belt land behind Shottfield Close.

This inappropriate development lacks exceptional circumstances and causes substantial harm to Green Belt openness, rural character, and village separation.

Key issues:

- Highways: Car-dependent; narrow, congested roads; underestimated traffic; no safe pedestrian/cycle links or public transport upgrades.
- Infrastructure: Sewage at capacity; untested drainage risks flooding and groundwater pollution; GP services overstretched with no local fixes.
- Landscape: Loss of open countryside, key views, and soft village edge; visible suburban intrusion.
- Ecology: Habitat loss for bats, badgers, skylarks; unproven biodiversity gains; lighting threats.
- Sustainability: Oversized scheme mismatches local housing needs; reinforces car reliance; premature ahead of new Local Plan.

The harms far outweigh any benefits. Suitable brownfield alternatives exist. The proposal should therefore be refused on Green Belt, sustainability, and policy grounds.

This objection brings together both community evidence and professional analysis, it draws upon consultee comments, local plan policies, and independent assessments to present a structured, policy-based objection, drawing on:

- National Planning Policy Framework (NPPF, 2024).
- The St Albans District Local Plan (1994) and Emerging Local Plan (2024).
- The Sandridge Parish Neighbourhood Plan 2019–2036 (Referendum Version March 2021).
- Statutory consultee responses and specialist technical assessments including; flood risk, ecology, highways, and infrastructure capacity.

The emerging local plan is now in the final stages of the Inspector led hearings. Inspectors have stated that the aim is deliver a plan with “main modifications” i.e. to adjust the submitted local plan to allow for the plan to be adopted in 2026. On this basis we assert that there must be considerable weight given in planning balance to the emerging local plan. Within the plan, Sandridge continues to be protected by green belt and is given washed over village status, there is no proposed change to this. This application sits outside the local plan site allocation and should be rejected for inappropriate harm to green belt as defined by NPPF 2024.



Formal Objection Letter

planning application reference 5/2025/1556

The following sections outline the key planning conflicts and material considerations demonstrating why this application is unsound, unsustainable, and should be refused

2. Policy Context

2.1 National Planning Policy Framework (NPPF, 2024)

The National Planning Policy Framework (NPPF, 2024) sets out the Government's planning policies for England and how these are expected to be applied. It promotes a *presumption in favour of sustainable development* while balancing this against the need to protect the Green Belt, safeguard the environment, and promote sustainable patterns of growth.

Under paragraph 161 of the NPPF (Dec 2024), the planning system is required to support the transition to net zero by 2050 and shape places in ways that contribute to radical reductions in greenhouse gas emissions. The proposed development conflicts with these principles by promoting car-dependent housing in a location with limited sustainable transport connectivity, thereby increasing carbon emissions and local traffic congestion

2.2 Green Belt Protection

Paragraphs 145–150 of the NPPF confirm that Green Belt boundaries should be altered *only in exceptional circumstances*, and solely through the plan-making process — not on an ad-hoc or site-specific basis. Local authorities must first demonstrate that all reasonable options for meeting development needs have been examined before Green Belt land is released.

The site at Shottfield Close remains designated Green Belt and is not identified for development in either the adopted or emerging Local Plan. The proposal therefore constitutes inappropriate development, which is by definition harmful to the Green Belt's openness and permanence, and can be justified only by very special circumstances — none of which have been demonstrated.

This position is reinforced by the Sandridge Neighbourhood Plan (2019-2036), which recognises the Green Belt as essential to maintaining the village's compact form and rural identity.

Policy D1: Settlement Boundary

"The settlement boundary for Sandridge village is identified on the Policies Map. New development within the boundary will be supported in principle where it is appropriate in scale, form, character and location. Development outside the boundary will be treated as being in the Green Belt and will only be acceptable where it accords with Green Belt policy and the policies of this Plan."

Policy E2 – Landscapes, Views & Gaps

From the Examiner's Report summarising it:



Formal Objection Letter

planning application reference 5/2025/1556

“Policy E2 concerns landscapes, views and gaps. ... ‘In order to maintain the views, landscape features and gaps between settlements, development proposals should:

- Assess any adverse impact on landscape, fields, views and gaps and protect these features or provide mitigation against their loss.*
- Not increase the prominence of the settlement within the landscape.*
- Maintain the open and undeveloped nature of the gaps between neighbourhoods to prevent coalescence and retain the individual identity of settlements.*
- Retain agricultural land for agriculture, particularly on land currently designated as agricultural grades 1 to 3a (agricultural land designations).*
- Protect significant views of important landscape features and heritage assets into and out of Sandridge village, as indicated on Figure 13, unless appropriate mitigation takes place.’”*

The proposed development would therefore conflict with both national Green Belt policy and neighbourhood-level policy objectives

2.3 Sustainable Development Principles

Paragraph 8 of the NPPF defines the three overarching objectives of sustainable development:

- Economic – to help build a strong, responsive economy;
- Social – to support strong, vibrant, and healthy communities; and
- Environmental – to protect and enhance the natural, built, and historic environment.

For development to be sustainable, these objectives must be delivered in balance. The proposed scheme fails this test because it would:

- Cause permanent environmental harm through the loss of undeveloped Green Belt land;
- Overstretch community infrastructure, which is already under significant pressure; and
- Deliver limited, short-term economic benefit to the local area.

The Sandridge Parish Neighbourhood Plan Policies Section D (Sustainable Development) and Section E (Sustainable Environment, Health & Wellbeing) further require new development to reinforce local distinctiveness, integrate with existing settlement form, and support community well-being. The proposal fails to achieve these aims and therefore cannot be regarded as sustainable under national or local planning policy.

2.4 Local Policy Context

The proposal conflicts with several adopted policies, including:

- **St Albans District Local Plan (1994)** – Policies 1 (Metropolitan Green Belt), 2 (Settlement Hierarchy), and 112 (Design and Layout of New Housing), which collectively safeguard the countryside from inappropriate development and ensure that new housing respects the scale, form, and character of existing settlements.
- **Emerging Local Plan (2024)** – Policies SP1 (inc. Para 1.32) and LG5, which prioritise brownfield development and retain Green Belt protection.



Formal Objection Letter

planning application reference 5/2025/1556

- **Sandridge Parish Neighbourhood Plan** – Policies E1 (Natural Environment, Biodiversity and Green Infrastructure), E2 (Landscape, Views & Gaps), and D1 (Settlement Boundary), which collectively protect the village’s rural character, preserve key visual corridors towards Heartwood Forest, and ensure that growth occurs only within defined boundaries.

The Sandridge Neighbourhood Plan also states:

“Our vision is that in the future, Sandridge Parish will continue to be an inclusive, cohesive and safe community with a high quality of life which retains the distinct character of its neighbourhoods – Sandridge village, Marshalswick North and Jersey Farm. Between and through these geographical areas lie open spaces and green corridors and, although each area has its own character, together they comprise the Parish.”

And St Albans Local Plan (Emerging);

3.5 Where there is an insufficient supply of brownfield sites it may be necessary to meet the need by considering other available land; in St Albans District this includes looking at Green Belt land and its boundaries. National policy is clear that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, it must be demonstrated that all other reasonable options for meeting its identified need for development have been fully examined.

By seeking the premature release of unallocated Green Belt land outside the plan-led process, the proposal directly undermines the spatial strategy set out in both the emerging Local Plan and the Neighbourhood Plan.

2.5 Summary

In policy terms, the proposed development:

- Conflicts with the NPPF (2024) tests for sustainable development.
- Constitutes inappropriate development within the Green Belt.
- Contravenes the Sandridge Parish Neighbourhood Plan (including policies D & E).
- Fails to demonstrate any very special circumstances to justify approval.

Accordingly, the proposal is fundamentally contrary to national, local, and neighbourhood planning policy and should be refused.

3. Green Belt and Exceptional Circumstances

3.1 Green Belt Purpose and Policy Context

The proposed development site lies within the Metropolitan Green Belt, designated to prevent urban sprawl and safeguard the countryside surrounding St Albans and its neighbouring



Formal Objection Letter

planning application reference 5/2025/1556

settlements. The Green Belt serves five key purposes, as set out in paragraph 143 of the National Planning Policy Framework (NPPF, 2024):

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns from merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The proposed development would conflict with several of these purposes, particularly in terms of encroachment, urban sprawl, and the erosion of local identity and settlement separation. The openness of the land at Shottfield Close currently provides a clear and defensible boundary between the built-up form of Sandridge village and the surrounding countryside.

3.2 Inappropriate Development

Under paragraph 153 of the NPPF, the construction of new buildings in the Green Belt is considered inappropriate development, unless it falls within the specific exceptions set out in paragraphs 154–155. The proposed residential development — comprising 84 dwellings plus associated infrastructure and access roads — does not meet any of these exceptions.

The Sandridge Parish Neighbourhood Plan (2019–2036), adopted following a local referendum, carries statutory weight under Section 38(6) of the Planning and Compulsory Purchase Act 2004. It establishes a clear spatial vision to:

“Retain the rural character of Sandridge and prevent encroachment into open countryside.”

Key conflicts with the Neighbourhood Plan include:

- **Policy D1 – Settlement Boundary:** The proposed site lies wholly beyond the settlement boundary and is not allocated for development.
- **Policy E1 – Green Infrastructure:** The loss of agricultural and recreational land, with no proposed mitigation, is contrary to this policy.
- **Paragraph 4.15.4:** “Retain our Green Belt and open spaces.” The proposal fails to meet this fundamental objective.
- **Paragraph 4.18.b:** “Respect and protect the characteristics and environments valued by residents.” The development would permanently alter the village’s rural setting.

SOS concurs with the Parish Council’s statement that:

“This is not small-scale infill within the defined boundary but a large-scale extension that would transform Sandridge into an urban extension of St Albans.”

Further guidance from the Sandridge Neighbourhood Plan reinforces these concerns:



Formal Objection Letter

planning application reference 5/2025/1556

- **Paragraph 5.20:** New buildings should utilise available infill or brownfield sites yet discourage excessive development that results in inappropriate growth without provision of supporting infrastructure.
- **Paragraph 4.18 (page 14):** Within the broad objectives identified, a number of issues are highlighted:
 - a) Development should respond to and reflect identified local needs, such as affordable, social, and older people's homes.*
 - b) Development should respect, and in some instances protect, the characteristics and environments valued by residents and which define the Parish.*
 - f) Small-scale infilling and redevelopment, within the defined boundary to Sandridge village, controls the spread of Sandridge village by respecting the boundaries of the Green Belt and the boundary between the village and estates on the edge of St Albans.*
 - g) Flora and fauna will be protected by providing or preserving open space provision.*
 - i) Local Green Spaces outside the Green Belt represent a strategic public and private open space network, which is an essential part of the Parish's Green infrastructure and should be sustained.*
 - j) Any development outside a Broad Location should be infill or use brownfield land without over-developing any plot or location. Building density should reflect and empathise with current densities, character profiles and area statements for Sandridge village, Marshalswick North and Jersey Farm (all of which are Areas of Residential Character).*
 - k) Current infrastructure provision of utilities (gas, electricity, communication, broadband, sewerage and water), roads, access, parking, green spaces, and facilities for the Parish are at maximum capacity. Developers of any new building should work with agencies to ensure sufficient supply as an essential part of the development. Water supply is a particular concern in the area.*
 - l) For large developments, applicants should work with relevant Council departments to supply: increased education, health and social care capacity, and fire and rescue provision to match the further demand from these new builds; provide access, via highways, control of traffic congestion and car parking, to service the builds; include reliable passenger transport, travel plans, bus and community transport links.*

Given the scale and location of the proposed development, it must therefore be regarded as inappropriate development and, by definition, harmful to the Green Belt. Substantial weight must be attached to this harm in the planning balance, as confirmed by national case law (see *Redhill Aerodrome Ltd v Secretary of State for Communities and Local Government* [2014] EWCA Civ 1386)

3.3 Harm to Openness and Character

The proposed development would irreversibly alter the character and openness of the site. The introduction of built form, lighting, parking areas, and associated activity would transform an open greenfield parcel into a suburban residential estate, visible from multiple public viewpoints.

This would erode the visual and spatial openness of the Green Belt, undermining its fundamental purpose in maintaining the rural setting and identity of Sandridge village. Once lost, such openness cannot be recovered.



Formal Objection Letter

planning application reference 5/2025/1556

The open agricultural nature of the site, rising from Shottfield Close toward Langley Grove, contributes significantly to the visual separation and rural setting of Sandridge. The introduction of 84 dwellings, road infrastructure, and lighting would destroy the existing landscape character, contrary to:

NPPF paragraphs 188 (protecting and enhancing valued landscapes and the intrinsic character and beauty of the countryside)

St Albans Landscape Character Assessment (Area 102 – Sandridgebury and Pipers Lane), which identifies the area as a “*peaceful landscape with few detractors*”; and

Sandridge Parish Neighbourhood Plan;

Policy D1 Settlement Boundary Sandridge village lies within the Green Belt. The Green Belt settlement boundary for Sandridge village is shown on the map below. Within this boundary, small scale (defined as development consisting of less than 10 dwellings over the plan period) infilling and redevelopment for residential use, related community facilities and services, or small start-up businesses will be permitted in accordance with the local development plan, providing that such development provides facilities that support the village community or its visitors

5.10 Within the Local Plan (Policy 2 – Settlement Strategy) it states that ‘... development will not normally be permitted except: a) the local housing needs; b) local facilities and service needs of the settlement in which the development is proposed. Development must not detract from the character and setting of these settlements within the Green Belt.’

5.12 Sandridge village lies within the Green Belt and so in order to ensure that new development constitutes infilling, the settlement boundary of the village has been defined in this Plan.

1. New development is sited so as not to intrude upon the landscape, in accordance with Policy E2 Landscapes, Views and Gaps.

The proposal would intrude upon the landscape, and its views and gaps.

3.4 Lack of Exceptional Circumstances

The NPPF and case law make clear that “*exceptional circumstances*” are required to alter Green Belt boundaries through the plan-making process, and “*very special circumstances*” are required to justify individual proposals for inappropriate development.

The Council’s *Green Belt and Exceptional Circumstances Evidence Paper* (September 2024) provide the most recent statement of local policy justification for any Green Belt release through the emerging Local Plan. It sets out the methodology for identifying land suitable for potential release and confirms that “*Exceptional Circumstances*” can only be demonstrated where all reasonable options for development have first been exhausted — including maximising brownfield opportunities, optimising urban densities, and cooperating with neighbouring authorities to address unmet need. The Paper also clarifies that not all land considered within the Green Belt Review is appropriate for release: only those locations that



Formal Objection Letter

planning application reference 5/2025/1556

would cause no significant harm to the wider integrity of the Green Belt, and that deliver measurable social, economic and environmental benefits, were recommended for further consideration.

There is no evidence that the application site at Langley Grove / Shottfield Close falls within any of the parcels identified for potential Green Belt release in the emerging Local Plan. Consequently, the proposal conflicts with the Council's own evidence base and cannot rely on the conclusions of that Paper to justify development in this location.

According to paragraphs 146–147 of the NPPF 2024 — and as reiterated within the Council's Evidence Paper (2024) — changes to Green Belt boundaries may only be justified in “exceptional circumstances” following a full assessment of reasonable alternatives. The application site is open agricultural land, not previously developed, and provides a clear and defensible Green Belt boundary consistent with the settlement edge of Sandridge. Development here would directly conflict with paragraph 149 of the NPPF 2024, which requires that Green Belt boundaries be defined using “physical features that are recognisable and likely to be permanent.”

The applicant has not demonstrated any *very special circumstances* sufficient to outweigh the substantial harm caused by the proposal. Claims of housing need do not meet this threshold, as housing pressure alone is not considered exceptional. Numerous planning appeals have reaffirmed this principle — most notably *Calverton Parish Council v Nottingham City Council [2015] EWHC 1078 (Admin)* — where unmet housing need was found insufficient to justify Green Belt release in isolation.

Accordingly, SOS finds the proposal to be fundamentally contrary to the development plan and inappropriate development in the Green Belt for which no very special circumstances exist.

It fails to comply with:

- **NPPF paragraphs 143,146-156**
- **St Albans Local Plan (Policy 1)**
- **Sandridge Parish Neighbourhood Plan Section 4, and Policy E**
- **Emerging Local Plan Chapter / Policy 3**

3.5 Prematurity and Precedent

The proposal would prejudice the plan-making process currently being undertaken by St Albans City and District Council. The emerging Local Plan is identifying suitable and sustainable locations for housing growth through a comprehensive, evidence-based assessment of Green Belt boundaries. Approving this application ahead of that process would set a dangerous precedent, encouraging speculative applications on unallocated Green Belt land and undermining public confidence in the democratic planning framework.

Furthermore, the release of this site could trigger incremental encroachment into the surrounding Green Belt, eroding the defined edge of Sandridge and weakening the integrity of the boundary with open countryside.



Formal Objection Letter

planning application reference 5/2025/1556

CPRE Hertfordshire highlights that since December 2024, numerous speculative Green Belt applications across Hertfordshire have sought to exploit the revised NPPF language.

The cumulative erosion of Green Belt integrity through incremental approvals would constitute a major policy failure, contrary to paragraph 149(f) of the NPPF (December 2024), which emphasises that Green Belt boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent.

The application for 84 dwellings on this site would set a dangerous precedent, encouraging further loss of protected land and undermining public confidence in local and national Green Belt protections.

3.6 Inappropriate Development and “Grey Belt” Assertions

The applicant relies upon the “grey belt” concept referenced in the *revised NPPF (2024)* to suggest reduced Green Belt protection. However:

- The NPPF glossary makes no lawful reclassification of land within the Metropolitan Green Belt; “grey belt” is not a statutory planning category.
- The applicant identifies “very special circumstances” as a “fallback position” (Planning Statement, paras. 6.17, 6.29) but fails to specify any local, site-specific justification.
- The site retains clear openness, landscape quality, and functional connection to the wider countryside, including Heartwood Forest and the Hertfordshire Way—contradicting any claim of degraded or semi-urbanised land.

As noted by CPRE Hertfordshire (2025):

“The identification of ‘grey belt’ is being misapplied to justify speculative development across Hertfordshire. This site remains demonstrably open countryside and continues to serve the Green Belt purposes defined by the NPPF.”

Summary

The proposed development:

- Constitutes inappropriate development within the Metropolitan Green Belt.
- Would cause substantial harm to the openness, landscape character, and rural setting of Sandridge
- Fails to demonstrate any very special circumstances capable of outweighing that harm.

Accordingly, the proposal is fundamentally contrary to national and local planning policy on Green Belt protection — including the NPPF, the St Albans Local Plan, and the Sandridge Neighbourhood Plan — and planning permission should therefore be refused.



Formal Objection Letter

planning application reference 5/2025/1556

4. Highways, Access and Transport

4.1 Overview

Save Our Sandridge (SOS) objects strongly to the proposed development on the grounds of transport, access, and highway safety. The applicant's Transport Assessment (TA), prepared by Markides Associates, presents an incomplete and potentially misleading picture of the likely transport impacts arising from 84 new dwellings accessed solely via Shottfield Close — a narrow residential cul-de-sac already experiencing parking congestion, restricted manoeuvring space, and limited pedestrian footway provision.

As noted in the St Albans Neighbourhood Plan (...): some residential roads, used as through routes for east-west traffic, are heavily congested during peak periods. High levels of car ownership and use outstrip available parking provision in certain areas of the Parish, particularly around schools and shops. Public transport availability is patchy and extremely limited in some neighbourhoods.

The proposals fail to demonstrate that safe and suitable access to the site can be achieved for all users, as required by paragraph 115 of the National Planning Policy Framework (NPPF, 2024). They also fail to comply with Hertfordshire County Council's Local Transport Plan (LTP4) and the Place and Movement Design Guide standards regarding street hierarchy, emergency access, and the protection of residential amenity.

4.2 Inadequacies in the Applicant's Transport Assessment

4.2.1 Methodology and Data Sources

- The TA relies on *Census 2011* data to determine mode share, despite acknowledging that this dataset is outdated and does not reflect post-pandemic travel behaviour or current local car-dependency rates. Using pre-COVID commuting patterns underestimates car trips and inflates sustainable-travel assumptions, contrary to the NPPF requirement for robust, up-to-date evidence (para 115-117).
- Comparative trip rates are derived from TRICS sites across England, including Derby, East Sussex, Kent, and Norfolk — none of which accurately reflect the constrained, rural-edge, car-dependent nature of Sandridge. There is no justification for applying data from these locations to this small-village context.
- No independent verification or sensitivity testing has been undertaken to assess peak-hour congestion, school drop-off times, or seasonal variations associated with Heartwood Forest visitor traffic.

4.2.2 Traffic Generation and Impact

- The TA forecasts just 48 vehicle trips in the AM peak and 41 in the PM peak — equating to 89 two-way peak-hour vehicle movements. This appears materially understated for a development of 84 units, the majority of which are family-sized dwellings, and does not account for delivery, service, refuse, or visitor traffic.
- A total provision of 194 parking spaces (average > 2 per dwelling) contradicts the applicant's own assumptions of "sustainable travel" and confirms that the site will be highly

Formal Objection Letter

planning application reference 5/2025/1556

car-dependent. This equates to nearly 200 daily vehicle movements via Shottfield Close, compounding existing congestion and safety issues.

- The junction modelling (PICADY) assumes idealised driver behaviour and perfect visibility, concluding that the Langley Grove / Shottfield Close junction is predicted to operate “comfortably within capacity.” This conclusion is unreliable because:
 - o No growth factors were applied beyond 2025;
 - o The model ignores cumulative development and school-run traffic; and
 - o No assessment has been made of queuing at Sandridge High Street or the A1081 junctions, which already experience delays and safety conflicts.

4.3 Local Access Constraints

4.3.1 Shottfield Close and Langley Grove

Both Shottfield Close and Langley Grove are narrow residential streets with on-street parking on both sides, creating pinch points that already restrict access for larger vehicles. The proposed widening works and “inset bays” are inadequate mitigations:

- The claimed nine new parking bays merely redistribute existing parking pressure rather than providing genuine additional capacity.
- The turning head on Shottfield Close currently functions as essential space for manoeuvring; introducing a through-access would compromise safety for children and pedestrians.
- Construction traffic during build-out would cause significant temporary impacts on amenity, air quality, and safety, contrary to NPPF paragraphs 115–117, which require developments to provide safe and suitable access and mitigate transport-related impacts



A bus stuck in Langley Grove with cars parked on both sides

Formal Objection Letter

planning application reference 5/2025/1556

4.3.2 Pedestrian and Cyclist Safety

The applicant suggests that the development will “significantly enhance connectivity” to Heartwood Forest via new pedestrian and cycle links. In reality:

- No controlled crossing points are proposed to connect with existing village routes or Sandridge Primary School.
- Cycle access is tokenistic; there are no segregated cycle lanes or safe connections to the wider St Albans network.



House Lane with parked vehicles both sides, bus blocked, cyclist danger

This fails to meet the requirements of LTP4 Policy 1 (Active Travel) and NPPF para 117, both of which require developments to prioritise pedestrian and cycle movements. Given the closure of the village shop and the limited number of other amenities within walking distance, future residents would remain highly car-dependent — contrary to the NPPF’s emphasis on sustainable transport patterns.

4.4 Parking Provision and Overspill Risk

The provision of 194 car spaces across the site would generate high traffic volumes inconsistent with a sustainable village location.

SOS’s local survey evidence demonstrates that on-street parking in Langley Grove and Shottfield Close is already at capacity. The applicant’s claim that “no overspill will occur” is based on speculative census averages rather than observed local conditions. There is a significant risk of additional on-street parking, particularly from visitors and multi-car households, which would further degrade safety and amenity.

Formal Objection Letter

planning application reference 5/2025/1556



The junction of Langley Grove and Woodcock Hill at school pick-up

4.5 Cumulative and Network Impacts

The TA isolates the site rather than considering cumulative effects from other recent and planned developments in the Sandridge and Marshalswick area. When combined with existing school traffic, Heartwood Forest visitors, and rural-lane congestion, the proposal would:

- Increase queue lengths and turning conflicts at Langley Grove / Sandridge High Street, a known pinch-point;
- Undermine the objectives of the *Sandridge Neighbourhood Plan*, which seeks to protect road safety and rural tranquillity; and
- Create safety conflicts for vulnerable users, including schoolchildren walking to Sandridge Primary School.

4.6 Public Transport Access

Public transport provision in this location is limited. The nearest bus stop is on Langley Grove; however, not all routes serve this location. The next nearest stop is on Sandridge High Street, where services are infrequent and do not provide a viable alternative for commuting or school travel.

The proposed development includes no improvements to bus infrastructure, service frequency, or safe access to bus stops. This represents a missed opportunity to reduce car reliance and conflicts with paragraphs 109-118 of the NPPF, which require developments to prioritise sustainable transport choices.



Formal Objection Letter

planning application reference 5/2025/1556

4.7 Construction Traffic Impacts

During construction, significant disruption would occur from heavy goods vehicles (HGVs) accessing a confined residential cul-de-sac. The lack of a designated construction access route, combined with existing parking and geometry constraints, raises serious concerns regarding highway safety, noise, and residential amenity.

A robust *Construction Management Plan* would be required; however, even with such mitigation, the physical limitations of Shottfield Close make the proposal unsuited to a scheme of this magnitude.

4.8 Summary

The proposed development:

- Would intensify traffic on a narrow residential cul-de-sac unsuited to traffic volumes of this scale.
- Fails to provide safe and inclusive access for vehicles, pedestrians, and cyclists.
- Lacks credible sustainable transport connections.
- Increases the likelihood of conflict, congestion, and road-safety incidents; and
- Would result in unacceptable impacts on residential amenity and the operation of the local highway network.

Accordingly, the proposal is contrary to paragraphs 115-117 of the NPPF 2024, Policies 1, 34 and 40 of Hertfordshire LTP4, and Policy / Chapter 8 of the St Albans District Local Plan (Emerging).

5. Utilities and Infrastructure Capacity

5.1 Overview

Infrastructure capacity and environmental safeguarding are fundamental to determining the suitability and sustainability of any development proposal. This section reviews the adequacy of local utility provision — including foul and surface water drainage, potable water, and essential community infrastructure such as healthcare — in the context of the proposed 84-unit scheme at Land Rear of Shottfield Close, Sandridge.

While the applicant has sought to demonstrate technical compliance, evidence indicates that significant constraints remain, particularly regarding drainage performance, groundwater protection, and the limited capacity of existing public services.

5.2 Foul Water Drainage

The applicant asserts that the site is “not at risk of flooding” and that foul water will discharge to the existing Thames Water sewer in Shottfield Close with sufficient capacity in the network. However, Thames Water’s consultation response contradicts this, confirming:



Formal Objection Letter

planning application reference 5/2025/1556

“Following initial investigations, Thames Water has identified an inability of the existing sewage treatment works infrastructure to accommodate the needs of this development proposal.”

Thames Water therefore requested a condition preventing occupation until either:

- (a) required sewage treatment upgrades have been completed, or
- (b) a phasing plan has been agreed.

This clearly demonstrates that essential off-site infrastructure **is** not yet available to serve the development and that there is a tangible risk of sewage flooding or pollution incidents if construction proceeds prematurely.

Thames Water also recognised that this catchment experiences high infiltration flows during certain groundwater conditions and advised close liaison with the Lead Local Flood Authority (LLFA) to agree a sustainable drainage strategy before any connection to the public sewer.

Although the applicant refers to “embedded sustainable drainage measures,” no detailed SuDS strategy or long-term maintenance plan has been submitted. Without this, the proposal conflicts with:

- NPPF 2024 paras 161–182 require that plans and development proposals take a sequential, risk-based approach to flood risk. The policy also places importance on drainage systems and managing residual flood risk.” Para 162, “requires that plans should take into account all sources of flood risk, including future climate change impact”
- Hertfordshire Local Flood Risk Management Strategy (2023) – requiring discharge rates below greenfield levels; and

5.3 Surface Water Drainage

The Flood Risk Assessment and Drainage Report (Markides Associates) states that the site lies within Flood Zone 1 and proposes management through infiltration features such as soakaways, an infiltration basin, and permeable paving.

However, these conclusions are based on desktop data only: no infiltration testing, seasonal groundwater monitoring, or site-specific modelling has been undertaken. The reliance on assumed infiltration rates introduces uncertainty regarding the system’s effectiveness and long-term reliability.

5.4 Groundwater Protection

The site lies above a Principal Chalk Aquifer and within a Source Protection Zone III, where infiltration systems must be designed to prevent contamination of groundwater used for public supply. No detailed pollution-risk assessment or evidence of appropriate pre-treatment measures has been provided. Given the hydrogeological sensitivity of the location, this represents a significant information gap.



Formal Objection Letter

planning application reference 5/2025/1556

5.5 Maintenance and Management

The proposed maintenance schedule references industry standards but provides no details of:

- Who will be responsible for ongoing inspection and maintenance;
- How funding will be secured; or
- Contingency measures in the event of system failure.

Without clear long-term governance arrangements, there remains a risk of system neglect or flooding.

5.6 Healthcare Infrastructure Capacity

The Sandridge Neighbourhood Plan notes on page 9:

3.10 The limited primary healthcare provision within the Parish is at full capacity. As well as a satellite surgery at Jersey Farm and a remote unit providing appointments in Sandridge village, there are two pharmacies in the shopping areas of Jersey Farm and Marshalswick. Hospital planned and emergency healthcare provision is spread over a number of remote hospital sites that are not well served by public transport.

The Hertfordshire and West Essex Integrated Care Board (HWE ICB) confirms that most local GP practices, including the Sandridge branch of Parkbury House Surgery, operate at or beyond capacity. The ICB identifies a requirement for additional primary-care infrastructure and has requested a developer contribution of £140,448 to mitigate the impact of the Shottfield Close proposal.

However, this mitigation depends on a potential new facility at Woollam Park, which remains unapproved and unfunded. Until such provision is secured, the development cannot demonstrate the delivery of adequate healthcare services, contrary to paragraphs 96–102 of the National Planning Policy Framework (NPPF, particularly paragraph 101) and Policy S7 (Infrastructure Delivery) of the Draft Local Plan.

5.7 Summary

The evidence indicates that:

- Drainage and foul-water infrastructure capacity is uncertain and potentially inadequate.
- Groundwater protection and maintenance measures are insufficiently defined; and
- Local healthcare provision is already overstretched.



Formal Objection Letter

planning application reference 5/2025/1556

Accordingly, the proposal fails to demonstrate compliance with NPPF para 96-102, 161-182, the Hertfordshire Local Flood Risk Management Strategy, and Chapter 13 of the emerging Local Plan.

6. Flood Risk and Groundwater Protection



House Lane flooded as soon as it rained heavily



Woodcock Hill flooded after a couple of hours rain

6.1 Overview

Save Our Sandridge (SOS) objects to the proposal on the grounds of flood risk, inadequate drainage design, and groundwater vulnerability. The applicant's Flood Risk Assessment concludes that the site presents a "low risk" of flooding; however, this is based on untested assumptions and limited evidence. The site lies above a Principal Aquifer and within a Source Protection Zone, raising ongoing concerns about the protection of groundwater quality.

6.2 Flood Risk and Site Conditions

The site lies in Flood Zone 1, meaning it is at low risk from rivers and seas, but surface-water flooding and groundwater emergence remain possible, particularly during heavy rainfall or prolonged wet periods. Given the site's modest gradients and underlying chalk geology, there



Formal Objection Letter

planning application reference 5/2025/1556

is a potential for runoff to flow toward adjacent residential areas if infiltration measures underperform.

6.3 Drainage Feasibility

The applicant proposes to manage surface water through infiltration features. While this approach is often sustainable, its success depends on local soil conditions and groundwater depth. As no site-specific infiltration tests or seasonal monitoring have been submitted, the effectiveness of this approach cannot yet be confirmed. The Lead Local Flood Authority normally requires this evidence before planning permission is granted.

6.4 Groundwater Protection

Because the site overlies a Principal Aquifer, infiltration drainage must include robust safeguards to prevent pollution of groundwater. The applicant has not yet provided a detailed assessment of water-quality impacts or long-term monitoring proposals. Until this information is available, the proposal cannot demonstrate that it will not cause harm to groundwater or nearby watercourses.

Documented in the St Albans Emerging Local Plan, Chapter 3, HW3 Contaminated Land;

“Two sites in the District have particular groundwater contamination that must be taken into consideration for proposals in these locations:

- There is a Contaminated Land Special Site in Sandridge, St Leonard’s Court, from which a plume of bromate and bromide groundwater pollution stretches some 20 kilometres. Land use in this area should not exacerbate the groundwater pollution or interfere with remediation e.g. with infiltration drainage or losing monitoring infrastructure and access to sample the groundwater and surface water;”*

6.5 Maintenance and Long-Term Management

The success of infiltration systems relies on regular maintenance to prevent silt build-up and clogging. The applicant’s outline management plan lacks clarity about who will take responsibility or how the work will be funded. To ensure accountability, this should be secured through a planning condition or legal agreement before any development proceeds.

6.6 Policy Compliance

The proposal does not yet meet the requirements of:

- NPPF 2024 paragraphs 161–182, especially paragraph 182 on sustainable drainage systems, and paragraphs 196–201 on water quality and groundwater protection
- The Hertfordshire Local Flood Risk Management Strategy; or
- Policies S3 (Sustainable use of Green Belt) and S7, 9, 10 (Infrastructure) of the emerging Local Plan.



Formal Objection Letter

planning application reference 5/2025/1556

6.7 Summary

In summary:

- The site lies within a hydrogeological sensitive area above a Principal Aquifer;
- The proposed infiltration strategy remains untested and unverified;
- Off-site foul-water capacity is limited; and
- Maintenance and accountability arrangements are unclear.

These factors together indicate that the site cannot currently demonstrate safe or sustainable drainage. Further investigation and design detail are required before the development can be supported in principle.

7. Landscape, Heritage, Character and Visual Impact

7.1 Overview

The proposed development site lies to the rear of Shottfield Close, at the northern edge of Sandridge village. The site currently comprises open grassland bounded by hedgerows and scattered mature trees, forming part of the visual and spatial transition between the built edge of Sandridge and the wider rural landscape extending northwards.

While the applicant's Landscape and Visual Appraisal (LVA) seeks to demonstrate limited visual impact, a detailed assessment of baseline character, heritage setting, and local policy context indicates that the proposal would result in material harm to the village's landscape character, settlement form, and rural setting.

7.2 Policy Context

The National Planning Policy Framework (NPPF, paragraphs 131–141) requires developments to be well-designed, sympathetic to local character, and to recognise the intrinsic character and beauty of the countryside.

Relevant policies include:

- **NPPF paragraphs 135, 139–141** – ensuring development respects heritage setting, contributes positively to local distinctiveness, and responds to context;
- **Emerging Local Plan Policies S1, S4 and S7** – directing growth to sustainable locations and protecting rural landscape quality; and
- **Sandridge Parish Neighbourhood Plan (Policies D1, D2, E1, E2, E3)** – maintaining defensible settlement boundaries, sensitive edge transitions, and open landscape views that define the village's identity.



Formal Objection Letter

planning application reference 5/2025/1556

7.3 Landscape Character and Heritage Setting

The site lies within National Character Area 110: Chilterns and Hertfordshire Landscape Character Area 37 – St Albans Plateau, characterised by gently undulating farmland, hedgerows, tree belts, and small woodlands.

At a local level, the site forms a transitional fringe landscape, acting as:

- A visual and spatial buffer between Sandridge and open countryside.
- A green corridor connecting woodland belts north of the village to the wider hedgerow network; and
- A defining component in maintaining the compact form and rural identity of the settlement.

Historically, Sandridge developed as a linear village centred on St Leonard's Church and the High Street. The open fields to the north, including the application site, have long defined the limit of built form, providing separation between the historic core and later housing areas. Views across open farmland towards Heartwood Forest reinforce the perception of Sandridge as a rural settlement enclosed by countryside.

From the Sandridge Neighbourhood Plan:

Essential Characteristics and Community Perceptions

6.16 Sandridge is a quiet rural area surrounded by fields, hedgerows, and country lanes. There is a harmonious blend of local buildings using traditional materials. The church, village shop, public houses, and cottages along the High Street give Sandridge its essential historical and village characteristics.

6.17 The village is a popular location for outdoor recreation, with horse riders, walkers, cyclists, and dog walkers drawn to the rural environment, open landscape, and Sandridge's traditional village heart, shop, and pubs. Heartwood Forest has become an important visitor attraction and has contributed enormously to the local economy.

6.18 Residents appreciate and value the character of the village and the benefits of the thriving local economy and wish to see this preserved.

Development on this site would therefore erode this long-established relationship, introducing a suburban extension that conflicts with the village's organic growth pattern and undermines both its historic setting and landscape integrity.

7.4 Visual Context and Key Receptors

Key viewpoints include:

- Heartwood Forest public trails, especially along the southern boundary and elevated paths near Langley Wood;
- Footpath 18 (Hertfordshire Way), which runs adjacent to the site and offers open views across farmland; and



Formal Objection Letter

planning application reference 5/2025/1556

- Shottfield Close and Langley Grove, where the open aspect strongly contributes to the rural village edge.

The applicant's LVA underrepresents the visual sensitivity of these receptors. Photomontages omit key viewpoints within Heartwood Forest and along public rights-of-way. Even modest two-storey dwellings would break the skyline, introducing suburban features such as fencing, lighting and paved access roads visible from multiple public vantage points.

Principal visual receptors include:

- Residents of Shottfield Close;
- Users of public footpaths; and
- Visitors approaching Sandridge from Coleman Green and Hammonds Lane.

For these receptors, the magnitude of visual change would be medium to high, resulting in moderate-to-major adverse effects, contrary to the applicant's assessment of "minor".

7.5 Settlement Form, Design and Edge Definition

Sandridge is characterised by a compact, nucleated form historically bounded by consistent built edges. The proposed development would extend built form northwards into open countryside, breaching the existing settlement envelope and introducing urbanising influences into an area that currently defines the village's rural transition.

Although the applicant's Design and Access Statement refers to "a sympathetic edge-of-settlement design," the indicative layout instead proposes uniform, estate-style housing, inconsistent with the fine-grained and varied character of Sandridge's traditional fabric. It would:

- Replace the soft, vegetated boundary with engineered hard edges;
- Disrupt the natural, graduated transition between village and countryside; and
- Fail to reflect local vernacular patterns, proportions, and materials.

These impacts directly conflict with Sandridge Parish Neighbourhood Plan Policies D1, D2, E1, E2 which require that edge-of-village development transitions sensitively to open countryside and avoids visual dominance in rural settings.

7.6 Landscape Mitigation and Proposed Planting

The proposed mitigation — new hedgerow and tree planting, wildflower meadows, and selective vegetation retention — is positive in principle but limited in effectiveness.

- Vegetation will take 10–15 years to mature sufficiently;
- Development would remain visible above planting during establishment; and
- Lighting, surfacing and domestic paraphernalia would cause irreversible urbanisation of the currently open edge.



Formal Objection Letter

planning application reference 5/2025/1556

While new planting may soften visual impacts, it cannot mitigate the fundamental loss of openness and change in landscape character caused by the encroachment of built form.

7.7 Local Identity and Community Character

Sandridge's identity derives from its small scale, compact structure, and open landscape setting adjoining Heartwood Forest. Incremental incursions into open countryside — particularly those justified by speculative “Grey Belt” reclassifications — risk blurring the clear visual and spatial distinction between the village and the urban edge of St Albans.

Such erosion of rural separation would undermine the community's sense of place, contrary to the aims of the Sandridge Neighbourhood Plan and NPPF 2024 paragraphs 135 and 139, which require development to respect local character, contribute positively to local distinctiveness, and respond to context.

7.8 Cumulative and Night-Time Impacts

When viewed alongside other development pressures (e.g., Sandridgebury Farm), the proposal would contribute to incremental urbanisation of the northern edge. Each encroachment weakens the visual distinction between village and countryside — a cumulative process that cannot be mitigated by standard planting.

Artificial lighting from new streets and dwellings would degrade the existing dark-sky environment near Heartwood Forest. The absence of a Lighting Impact Assessment (contrary to Policy NEB6) means cumulative effects on bats, nocturnal birds and rural tranquillity remain unassessed.

Night-time illumination would extend the perceived visual envelope of the settlement, increasing skyglow and diminishing the sense of rural separation experienced along Footpath 18.

7.9 Compliance with Policy and Guidance

The proposal fails to comply with key design, landscape and heritage policies, including:

- **NPPF paragraphs 135 and 187 - 195** – requiring development to enhance the quality of its context, respect heritage settings, and recognise the character and beauty of the countryside.
- **Saved Local Plan Policies 85 and 106** – protecting heritage settings and ensuring design compatibility; and
- Sandridge Parish Neighbourhood Plan Policies D1, D2, E1 and E2 – safeguarding rural character, open views, and local distinctiveness.



Formal Objection Letter

planning application reference 5/2025/1556

7.10 Summary and Conclusion

In summary:

- The site forms an integral part of **Sandridge's** northern rural setting and historic landscape context;
- The proposal would cause material harm to local landscape character, settlement form and visual amenity;
- Mitigation would not offset the loss of openness or countryside transition; and
- The scheme introduces a suburban form and scale incompatible with local vernacular and Green Belt purpose.

Accordingly, the development would result in significant and irreversible harm to landscape, heritage setting and rural character, contrary to the NPPF, the Sandridge Parish Neighbourhood Plan, and the fundamental purpose of the Green Belt **to** safeguard the countryside from encroachment.

These landscape and character harms compound the Green Belt, ecological and biodiversity impacts identified in Sections 3 and 8, collectively providing strong grounds for refusal.

8. Ecology and Biodiversity

8.1 Overview

The applicant's ecological assessment identifies existing habitats of value across the site, including grassland, hedgerows, trees, and scrub, with potential for protected species such as bats, breeding birds, and invertebrates.

While the report concludes that biodiversity net gain (BNG) can be achieved through on-site enhancements and future landscaping, these claims rely heavily on assumptions, deferred details, and untested parameters that cannot be verified at outline stage.

Consequently, the proposal risks permanent loss and fragmentation of semi-natural habitats that contribute positively to Sandridge's ecological network.

8.2 Policy Context

National policy (NPPF paragraphs 187–201) requires development to:

- minimise impacts on and provide net gains for biodiversity; and
- protect and enhance valued landscapes, and the intrinsic character and beauty of the countryside (including the wider benefits from natural capital and ecosystem services)

Local policies reinforce these duties, including:

- **St Albans Local Plan Policy 105 (Nature Conservation)** – protect existing habitats and ensure measurable enhancement;
- **Sandridge Parish Neighbourhood Plan Policy E1** – preserve and enhance hedgerows, trees, and wildlife corridors linking the village to the wider countryside.



Formal Objection Letter

planning application reference 5/2025/1556

8.3 Baseline Ecological Conditions

The Ecological Appraisal and BNG Metric Report identify improved grassland bounded by mature hedgerows and tree belts. These linear features provide key corridors for bats, birds, and invertebrates, while trees and scrub offer nesting and roosting opportunities.

Baseline values recorded:

- 8.48 habitat units;
- 1.48 hedgerow units.

The site forms part of a wider green network connecting to Heartwood Forest and Hammonds Lane, contributing to local ecological connectivity.

8.4 Proposed Biodiversity Net Gain

The applicant asserts gains of +18.24 % habitat units and +85.04 % hedgerow units. These figures are indicative only, based on outline layouts and not supported by a fixed habitat specification or management plan.

The BNG Report itself confirms:

“The Statutory Metric will be revised at Reserved Matters, and the exact sum of off-site units will be recalculated at that time, based on finalised landscape proposals.”

This admission means the claimed net gain cannot be substantiated or secured at outline stage.

8.5 Methodological Weaknesses

The approach defers key evidence to later design stages, lacks a secured long-term management mechanism, and appears to double-count green areas used for drainage and habitat creation.

Without a detailed design and binding management framework, the BNG calculations are unverified and cannot be relied upon in determining the application.

8.6 Hedgerows and Trees

Existing hedgerows and boundary trees provide important ecological corridors for bat commuting, bird foraging, and invertebrate dispersal, while defining the countryside edge of the village.

Although the applicant states that these will be “retained where possible,” no final layout or arboriculture plan confirms this. Any removal or severance would reduce habitat connectivity between Heartwood Forest and the wider St Albans green network.

Formal Objection Letter

planning application reference 5/2025/1556

8.7 Protected Species



The proposed development site between Shottfield Close and the Hertfordshire Way

The Ecological Appraisal acknowledges potential for protected species but omits the targeted, season-appropriate surveys required to confirm presence and design mitigation.

Legal context

- Bats – All species and their roosts are protected under the *Conservation of Habitats and Species Regulations 2017* (as amended) and the *Wildlife and Countryside Act 1981*. It is an offence to damage, destroy or disturb a roost.
- Badgers – Protected under the *Protection of Badgers Act 1992*; interference with an active sett requires a Natural England licence.
- Skylark and farmland birds – All wild birds are protected under the *Wildlife and Countryside Act 1981*; skylark is a Red List and UK BAP priority species, demanding high-priority consideration under national and local policy.





Formal Objection Letter

planning application reference 5/2025/1556

Local evidence

- Confirmed bat roosting within roof eaves along Shottfield Close, adjacent to the site, forming part of a wider commuting corridor towards Heartwood Forest.
- HERC records show skylark activity on and adjacent to the site.

Herts Environmental Record Centre											
Common Name	Scientific Name	Group	Location Name	Date	Grid Reference	Method	Record Type	Comment	Survey Name	Taxon Occurrence	NERC IUCN
Skylark	<i>Alauda arvensis</i>	Birds	Field off Shottfield Close	06/07/2025-16/07/2025	TL175105	Sound	auditory record	Recording made from neighbouring garden - birds were well into the middle the field	HERC - Miscellaneous	LC0000140002960F	Sect.41 BRed

- Badger activity and active setts have been observed in adjoining fields and gardens.

Survey requirements

- The appraisal is based mainly on desk data. A comprehensive full-season survey programme, covering bats (emergence/re-entry and transects), badgers, breeding and wintering birds, and reptiles, must be undertaken in accordance with CIEEM guidance before any determination.
- A Lighting Impact Assessment is required to safeguard dark corridors used by bats and other nocturnal species.

Without this evidence, the Local Planning Authority cannot meet its statutory duty under *Regulation 9(3) of the Habitats Regulations 2017* or ensure compliance with the *Wildlife and Countryside Act 1981* and *Protection of Badgers Act 1992*.

Until such surveys and mitigation strategies are submitted and verified, the proposal fails to demonstrate that protected species would be lawfully safeguarded.

8.8 On-Site Management and Maintenance

The Maintenance and Management Plan focus primarily on drainage and provides no binding long-term framework for ecological management.

A legally enforceable Landscape and Ecological Management Plan (LEMP) covering at least 30 years, including monitoring and governance arrangements, is required to ensure sustained delivery of any biodiversity gains.

8.9 Lighting and Nocturnal Wildlife

Artificial lighting from the proposed development, including streetlamps and domestic security lights, has potential to disturb bats roosting in the eaves of properties along Shottfield Close and foraging routes across the site.

No Lighting Impact Assessment has been submitted, contrary to Sandridge Parish Neighbourhood Plan Policies E1 which seek to protect dark-sky conditions and biodiversity.

In addition, badger activity has been recorded locally and skylarks, a Red List species protected under the Wildlife and Countryside Act 1981, are known to nest in nearby open grassland.



Formal Objection Letter

planning application reference 5/2025/1556

A full ecological survey covering all seasons is therefore required to assess impacts on protected and priority species before determination.

8.10 Off-Site Compensation and BNG Delivery

No evidence has been provided of secured receptor sites or legal agreements to deliver off-site BNG. This deferral approach conflicts with *Natural England (2023)* guidance and *Schedule 14 of the Environment Act 2021*, both of which require measurable and secured BNG before permission is granted.

Accordingly, the proposal fails to demonstrate compliance with the statutory 10 % minimum BNG requirement.

8.11 Summary and Conclusion

- The development would cause loss and fragmentation of existing habitats forming part of Sandridge's ecological network.
- Claimed biodiversity gains are unverified and unenforceable at outline stage.
- Protected species surveys are incomplete, with confirmed bat roosts nearby and local records of skylark and badgers unassessed.
- A full-season ecological survey programme and legally binding LEMP (with off-site delivery mechanisms where necessary) must be completed and independently verified before any determination.

Accordingly, the proposal fails to meet the requirements of the *Environment Act 2021*, *NPPF 2024 187-201 (Conserving & Enhancing the Natural Environment)*, and relevant St Albans Local Plan and Sandridge Parish Neighbourhood Plan policies.

The scheme would result in a net loss of ecological integrity and connectivity and cannot be supported on ecological grounds.

9. Housing Need and Sustainable Development

9.1 Overview

The applicant proposes a residential development of 84 dwellings, comprising an equal split of market and affordable housing. The indicative schedule provides:

Market dwellings

- 3B5/6P: 29 units
 - 4B7P: 5 units
 - 4B8P: 8 units
- Total market: 42 units



Formal Objection Letter

planning application reference 5/2025/1556

Affordable dwellings

- 1B2P: 8 units
 - 2B4P: 17 units
 - 3B5P (F): 2 units
 - 3B5P (H): 13 units
 - 4B7P: 2 units
- Total affordable: 42 units

The mix is stated to provide a balance of family and smaller units, with each property benefitting from private gardens and on-site parking.

In the Sandridge Parish Neighbourhood Plan Vision & Objectives it states on Page 10 that;

4.3 For example, new homes will have been built. Our vision is that these homes should be sustainable, with a proportion of each development reserved for affordable homes and for local residents. Smaller units for first-time buyers or older residents looking to remain in the area will also have been built. Developments will be a mix of homes for either purchase or for rent, with no one area dominated by larger dwellings. Some of these new homes will have been built to an inclusive design standard so that they are capable of adaptation as their residents' needs change.

While the provision of affordable housing is, in principle, welcomed, the application fails to demonstrate that the proposed mix, density, and location respond to objectively assessed local housing needs or that it represents a sustainable form of growth consistent with the adopted and emerging policy framework.

9.2 Policy Context

The National Planning Policy Framework (NPPF 2024) requires local authorities to deliver a sufficient supply of homes that meet the needs of present and future generations (paragraphs 61-63) while ensuring development is sustainable, accessible, and well-served by infrastructure (paragraphs 96–102 and 115–117)

Local policy context includes:

- St Albans District Local Plan Policy 7 (Settlement Hierarchy and Housing Strategy), which directs major residential development to sustainable urban locations with access to services and public transport.
- Policy 10 (Affordable Housing), which requires that affordable housing provision reflects local need and site viability; and
- Sandridge Parish Neighbourhood Plan Section D which emphasise that '*development should be proportionate to the village's scale and capacity, respect its rural setting, and support rather than undermine local services.*'



Formal Objection Letter

planning application reference 5/2025/1556

9.3 Local Housing Need

Sandridge is a small rural settlement surrounded by Green Belt. The adopted Local Plan identifies it as a village location with limited capacity for growth, and the Sandridge Neighbourhood Plan seeks to maintain a “modest and proportionate” level of infill development that reflects local needs rather than strategic expansion.

Evidence from the St Albans Housing Needs Assessment (HNA, 2021) indicates that local housing need in the parish is primarily for smaller units (1–3 bedrooms) suitable for downsizing households and younger families. The proposed scheme’s mix—almost 50% larger dwellings (3–4 bedrooms)—does not align with this profile and therefore risks overproviding larger, higher-value units that do not meet local demand.

Moreover, the HNA recognises that affordable housing need in Sandridge is comparatively modest and should be delivered through small-scale sites within the village envelope, not through extensive Green Belt release.

9.4 Sustainability and Accessibility

A central test of sustainability under the NPPF (paragraph 8) is the extent to which development supports the social, economic, and environmental objectives of sustainable development.

In this case, the proposed site performs poorly against each measure:

(a) Social Sustainability

- Sandridge currently has limited community infrastructure, including **no** operational village shop, which has recently closed.
- The loss of this facility further reduces the ability of residents—particularly those without private transport—to meet daily needs locally.
- Existing GP facilities (Parkbury House branch surgery) are acknowledged by the Hertfordshire and West Essex Integrated Care Board (HWE ICB) as inadequate and constrained, with plans to relocate outside Sandridge to Woollam Park.

As such, the proposal would increase population pressure on already overstretched local services without delivering new on-site community infrastructure.

(b) Economic Sustainability

- The development offers no employment space or contribution to the local economy beyond temporary construction jobs.
- With limited public transport and the absence of local retail or healthcare facilities, most future residents would be car-dependent commuters travelling to St Albans or beyond for work and services.



Formal Objection Letter

planning application reference 5/2025/1556

This pattern of development conflicts with sustainable growth principles and does not support the long-term vitality of the village.

(c) Environmental Sustainability

- The site is within the Metropolitan Green Belt, serving as part of the open rural setting separating Sandridge from the northern edge of St Albans.
- Its development would result in irreversible loss of countryside, additional vehicular emissions, and increased impermeable surfaces, with implications for local biodiversity, landscape character, and flood risk.

Taken together, these factors mean the proposal fails to constitute sustainable development as defined by the NPPF and does not comply with Appendix 4, 6.10 of the Sandridge Parish Neighbourhood Plan;

'Development will be limited to small-scale infilling and redevelopment of previously developed land.'

9.5 Healthcare and Community Infrastructure Capacity

The formal consultation response from the Hertfordshire and West Essex Integrated Care Board (HWE ICB) highlights significant existing constraints within local primary care provision. Key points include:

- Most local GP practices, including Parkbury House (Sandridge branch), are operating at or beyond capacity and fall below NHS building standards.
- The ICB acknowledges a need for new facilities, with early discussions focusing on relocating the Sandridge branch to a new site at Woollam Park—outside the village.
- The ICB has calculated that the proposed development would generate approximately 202 new patient registrations, requiring 20.05m² of additional GP space at a cost of £140,448 (or £1,672 per dwelling).
- Any future contribution would be secured via Section 106 and applied to off-site improvements at Woollam Park or other St Albans surgeries, not within Sandridge.

Consequently, while the ICB does not formally object, it confirms that no new healthcare provision will be delivered in Sandridge itself, leaving residents reliant on facilities that are already overstretched and increasingly remote.

9.6 Transport and Service Dependency

As identified in the Highways and Access section, Sandridge is poorly served by public transport and has limited walking and cycling infrastructure. The village is not a sustainable location for car-dependent development of this scale.



Formal Objection Letter

planning application reference 5/2025/1556

The closure of the village shop and limited local services further reinforce the unsustainable nature of the proposal:

- Residents would be forced to travel to St Albans for most daily needs, contrary to NPPF Section 9, paragraphs 115-117, which promote sustainable travel and reduction in private car use.
- The increased traffic would exacerbate congestion on Sandridge High Street and Langley Grove, as well as worsen local parking pressures.

This cumulative impact would undermine both local amenity and the Net Zero transport objectives of Hertfordshire County Council's Local Transport Plan 4.

9.7 Overall Assessment

The proposed development fails to demonstrate that it would:

- Meet the identified local housing needs for smaller, affordable homes within the village
- Support or enhance existing community infrastructure
- Deliver sustainable access to key services; or
- Provide a location consistent with the spatial strategy of the Local Plan and Sandridge Parish Neighbourhood Plan.

Instead, it would result in an unsustainable pattern of growth in a location that lacks the necessary services, transport links, and social infrastructure to accommodate it responsibly.

9.8 Conclusion on Housing Need and Sustainability

In summary:

- The proposal is disproportionate to Sandridge's scale and function, undermining the settlement hierarchy.
- The housing mix does not align with the objectively assessed local need.
- The loss of the village shop, combined with overstretched healthcare provision, significantly weakens the sustainability credentials of the scheme; and
- The site's car-dependent location fails to meet the NPPF's environmental and accessibility tests.

Accordingly, the application should be refused on the grounds that it does not constitute sustainable development and fails to respond to either local housing need or the established policy framework for Sandridge.



Formal Objection Letter

planning application reference 5/2025/1556

10. Conclusion

10.1 Summary of Key Objections

Save Our Sandridge (SOS) strongly objects to Planning Application 5/2025/1556 – Land Rear of Shottfield Close, Sandridge, for the proposed development of 84 dwellings, on the basis that the proposal fails to meet the tests of sustainable development, contravenes Green Belt policy, and would cause significant and irreversible harm to the character, infrastructure, and environmental quality of the village.

The assessment of the submitted documentation, together with relevant policy and local evidence, demonstrates that the proposal:

1. **Fails to meet the tests for Green Belt release**, as no genuine exceptional circumstances have been demonstrated in line with paragraphs 144–148 of the NPPF and the Council’s own Green Belt Review methodology.
2. **Undermines the purposes of the Green Belt**, eroding open countryside and compromising the spatial separation between Sandridge and St Albans.
3. **Is unsustainable in transport and accessibility terms**, relying almost entirely on private vehicle use and providing no meaningful public transport or safe active travel alternatives.
4. **Places unsustainable pressure on local utilities and infrastructure**, particularly with respect to surface water drainage, groundwater protection, and foul drainage, with key aspects of the applicant’s assumptions untested at this stage.
5. **Exacerbates existing flood risk and groundwater vulnerability**, given the site’s high aquifer sensitivity and lack of on-site verification through infiltration testing.
6. **Harms the established character and visual amenity of the village**, through encroachment into open Green Belt land and the introduction of suburban development at odds with the settlement form.
7. **Fails to respond to local housing need**, overproviding large family dwellings and underproviding smaller, affordable homes required by the Housing Needs Assessment.
8. **Lacks adequate local services and facilities**, particularly following the closure of the village shop and limited capacity in local health provision, as confirmed by the Hertfordshire and West Essex Integrated Care Board (HWE ICB).

These deficiencies collectively render the proposal inconsistent with both national and local policy objectives, including the NPPF (2024), the St Albans Local Plan, and the Sandridge Parish Neighbourhood Plan.

10.2 Policy Compliance and Legal Context

The proposal does not satisfy the requirements of:

- NPPF Paragraphs 61-64: Fails to ensure an appropriate supply and mix of housing that reflects local needs.



Formal Objection Letter

planning application reference 5/2025/1556

- NPPF Paragraphs 144–148: No exceptional circumstances or sustainable spatial rationale for Green Belt release have been demonstrated.
- NPPF Paragraph 187-195: Adverse impact on the intrinsic character and beauty of the countryside.
- NPPF Paragraphs 115-117: Fails to promote sustainable transport or reduce the need to travel by car.
- Sandridge Parish Neighbourhood Plan Policy D & E: The proposal is disproportionate in scale, unsustainable in location, and contrary to the vision of maintaining the village's rural identity.

10.3 Environmental and Infrastructure Concerns

The Flood Risk Assessment and Drainage Report identifies high groundwater vulnerability, a principal aquifer beneath the site, and location within a Zone III Source Protection Area, requiring the highest level of pollution control. Despite this, no ground investigation or infiltration testing has been undertaken. The applicant relies on assumed infiltration rates and unverified attenuation calculations, which do not constitute a robust evidence base.

While the Thames Water pre-planning enquiry confirms foul capacity for 84 dwellings, the confirmation is time-limited (12 months) and subject to no design changes. Surface water discharge to the public sewer network is explicitly prohibited. The proposed infiltration-based system, absent confirmatory testing, therefore, poses a material risk of groundwater contamination and potential failure in managing surface water runoff.

The Maintenance and Management Plan provided by Markides Associates sets out a long-term inspection regime but does not identify a responsible party or funding mechanism, raising concerns over the enforceability and viability of post-construction management.

10.4 Community and Service Capacity

Evidence submitted by the HWE Integrated Care Board confirms that local GP practices are already operating at or beyond capacity and that the nearest facility in Sandridge is substandard and likely to relocate out of the village.

The ICB's response makes clear that while mitigation contributions may be sought, they would fund improvements elsewhere (Woollam Park or central St Albans) rather than addressing the direct impact on Sandridge. This highlights a fundamental shortfall in local service provision and confirms that the proposal would increase service dependency on off-site infrastructure rather than support community sustainability.

Similarly, the recent closure of the Sandridge village shop removes a key local amenity and further undermines the sustainability rationale. Residents of the new development would need to rely on vehicular travel for basic needs, contrary to the NPPF's emphasis on reducing travel demand and supporting viable local centres.



Formal Objection Letter

planning application reference 5/2025/1556

10.5 Planning Balance

The Council is required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise (s.38(6) of the Planning and Compulsory Purchase Act 2004).

In this case, the harm to the Green Belt, the unsustainable location, and the environmental and infrastructure risks substantially and demonstrably outweigh any limited benefits from housing delivery. The Council's own evidence base demonstrates that it has undertaken a full examination of brownfield and urban capacity through the HELAA and Green Belt Review, and that Sandridge does not represent a sustainable or necessary location for strategic housing growth.

Furthermore, the application conflicts with the adopted Sandridge Parish Neighbourhood Plan, which forms part of the statutory development plan and carries full weight in decision-making.

This application sits outside the St Albans emerging (and current) local plan site allocation and should be rejected for inappropriate harm to green belt as defined by NPPF 2024.

10.6 Conclusion and Requested Determination

For the reasons set out throughout this representation, **Save Our Sandridge (SOS)** respectfully requests that **Planning Application 5/2025/1556** be **refused in full** on the following grounds:

1. **Inappropriate development within the Green Belt**, contrary to paragraphs 142-147 of the NPPF and St Albans Local Plan policies.
2. **Failure to demonstrate exceptional circumstances** or compliance with the sustainable spatial strategy of the Local Plan.
3. **Unsustainable location** lacking adequate access to local services, employment, and public transport.
4. **Adverse impact on the character, landscape, and visual setting** of Sandridge.
5. **Insufficient supporting infrastructure and community facilities**, exacerbating existing deficiencies in healthcare, retail, and amenity provision.
6. Insufficient detail on foul drainage, surface water management, and waste handling, with no clear evidence that the proposed system would prevent pollution or flooding downstream
7. **Failure to meet identified local housing needs**, resulting in an imbalanced and unsustainable community profile; and

The proposed development does not constitute sustainable development under the **NPPF** and would cause demonstrable harm to Sandridge's environmental, social, and spatial integrity.



Formal Objection Letter

planning application reference 5/2025/1556

SOS urges St Albans City and District Council to refuse the application in accordance with the development plan and material planning considerations.

On Behalf of
Save Our Sandridge (SOS) Campaign Group