

# Planning Statement

BATFORD MILLS

# Planning Statement

## Introduction

Milligan Knight Architects were commissioned by our Client, Catton Homes, to design a fresh new residential development of a high architectural quality to replace the existing industrial shed located on the corner of Crabtree Lane and Lower Luton Road.

This planning statement supports this planning application and demonstrates how our scheme has responded to the Harpenden Neighbourhood Plan.

We submitted a pre-application pack to St Albans in March 2019 and attended a meeting with Joanna Woof on 28th March 2019, with subsequent written advice received on 18th April 2019. (Ref: PRE/2019/0041)

A summary of the designs presented at pre-application stage, along with the issues raised and how these have been addressed, can be found in our Design and Access Statement. (Document: 172-BMH\_Design and Access Statement\_191115)

We have extracted out the relevant policies and objectives from the Harpenden Neighbourhood Plan (HNP) and outlined how we have addressed these in our submitted proposals.

# The Harpenden Neighbourhood Plan

## 4. Overall Vision and the Spatial Strategy

*“Harpenden is home to many important local businesses, as well as being considered a commuter town. The Neighbourhood Plan will promote Harpenden as an attractive place for businesses to locate and for people to work.”*

The proposals as submitted offer a collection of attractive new modern homes and business space to a site that is currently an eyesore and presents a poor first impression for people entering the town from the east on Lower Luton Road. The development will create a new mixed-use scheme that will benefit the local community and create a positive gateway to the town.

*“Improvements to facilities in the town will be promoted, including provisions for small businesses and our growing number of home workers.”*

The new development includes two commercial spaces that will provide accommodation for small businesses and new amenities for local residents, businesses and the new nearby school.

*“Where new housing is to be provided within Harpenden, the Neighbourhood Plan (HNP) seeks to ensure the right mix of sizes in the right location, including developments that prioritise housing for residents through their life from first time buyers to older residents seeking to downsize. New developments that conserve and enhance the existing built environment, including listed buildings and the Harpenden Conservation Area, will be supported and will continue the tradition of the high quality architecture seen throughout Harpenden and the Harpenden Rural Parish.”*

The housing proposed offers a good mix of units, from 1 and 2 bedroom flats through to 3 and 4 bedroom family townhouses. This will create a healthy mix of residents within the development and provides for a variety of potential residents i.e from older single residents through to young families.

*“SS1 – The Spatial Strategy*

*1. The Built up Area of Harpenden is the priority for new development in the Harpenden Neighbourhood Plan Area. The Built up Area Boundary of Harpenden is shown in Figure 4.1. In the event that St Albans City and District Council releases land in the Green Belt adjacent to the current Built up Area Boundary of Harpenden for residential development in a future Local Plan, that land is considered by this Policy to be within the Built up Area Boundary of Harpenden.”*

The proposed site sits within the “Built up Area Boundary”, as shown on the extracted figure 4.1 to the right. The scheme therefore satisfies this policy.



## SS2 – Infrastructure Zones

The five Infrastructure Zones are shown in Figure 4.2. In order to mitigate the impact of new development, certain proposals in each zone must meet the following criteria as well as satisfying the policies of this Neighbourhood Plan.

Significant development proposals in the North East must:

- Demonstrate how impact of new development on the Lower Luton Road and Station Road will be mitigated;

Please see submitted transport assessment for detailed analysis of the impact to Lower Luton Road.  
(Document: Batford Mill - TS - Final V1)

- Incorporate a proportionate amount of public open space in accordance with community needs, including sports and recreational space\*;

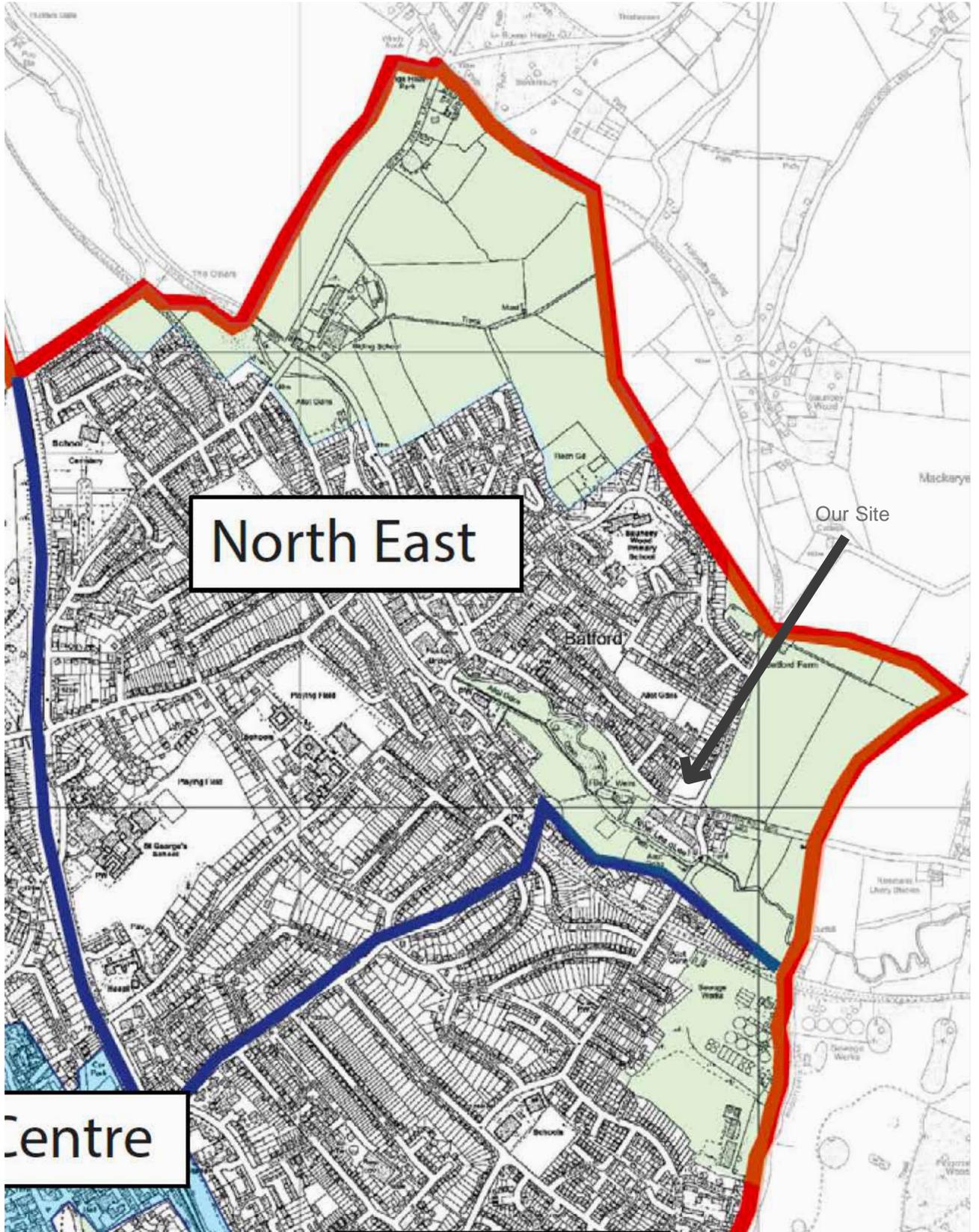
Communal green space has been incorporated within the site but the development also sits within a few minutes walk from the common land and nature reserve to the south, which includes a child's recreational space.

- Demonstrate provision for appropriate education facilities in close proximity to new development to meet the need for school places arising from the proposed development\*; and

The new Katherine Warrington School is currently being built directly opposite to the north of the site and we envisage the proposed dwellings providing welcome accommodation for families with children attending this school.

- Demonstrate sufficient convenience shopping within a close proximity to new development\*.

The proposed development is within a 5 minute walk of the Batford Local Centre, which offers adequate retail conveniences. The provision of a retail unit within our development will also provide local residents a new amenity on their doorstep.



Map Extract from HNP - Figure 4.2: Infrastructure Zones

## 5. Employment and Retail

*“Respondents overwhelmingly supported the protection of existing shopping areas (88%) and many supported the need for a greater range of shops.”*

*“ERO6: Support the principle of residents having easy access to small local convenience shops.”*

As part of the submitted scheme, we will be providing two new commercial units, with one classed for retail. Therefore with this development we will be increasing the range of shops available to local residents.

*“ERO1: Support a prosperous economy through encouraging improvements to existing employment and retail areas”.*

*“ERO7: Protect existing employment and retail sites, encourage full usage and support new employment developments.”*

The new commercial units will offer greater employment opportunity than the present industrial/storage unit. The spaces will be of greater benefit to the local community and provide welcome amenity provision.

*“ER2 – Designated Employment Locations The locations set out in Table 5.1 and shown at Figure 5.1 are designated as protected employment locations. At these locations, change of use to a non-B Class use will not be supported unless it can be demonstrated that the premises are no longer suitable for business use or there is clear evidence that there is no prospect of a new commercial occupier being found.*

<i>Reference</i>	<i>Name</i>
<i>DEL1</i>	<i>Rothamsted Research</i>
<i>DEL2</i>	<i>Southdown Industrial Estate</i>
<i>DEL3</i>	<i>Coldharbour Lane</i>
<i>DEL4</i>	<i>Batford Mill Industrial Estate”</i>

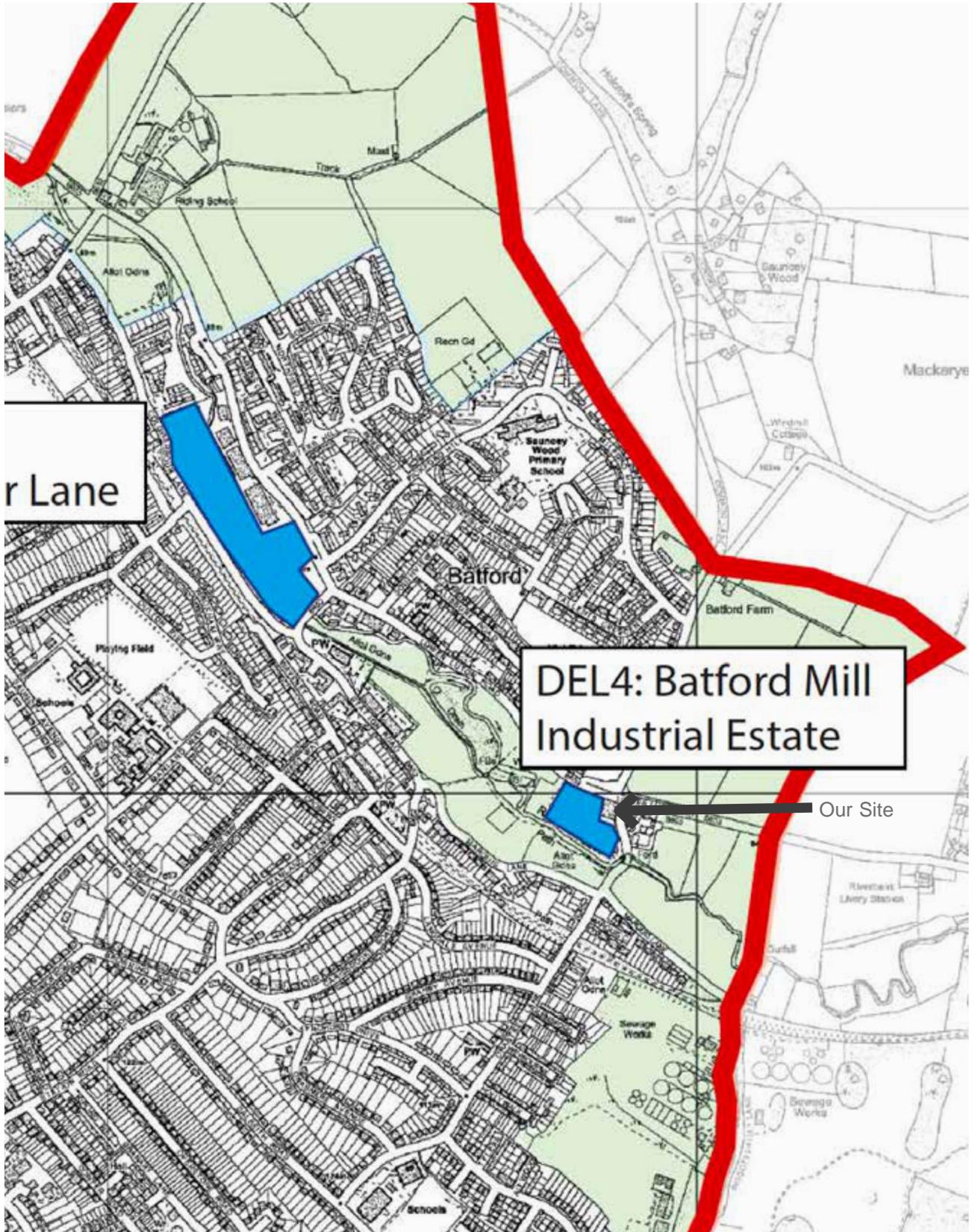
The site in question actually falls outside of the “Designated Employment Location” as illustrated on the map to the right (extracted figure 5.1).

The existing industrial unit is staffed by one person and is largely used as a storage facility for the individuals personal belongings. The building itself is unattractive and in a poor state of repair.

The new proposal seeks to include 140sqm of new commercial space, split into two tenancies with retail space (A1 use class) fronting onto Lower Luton Road and a gym/studio space (D2 use class) facing on to the communal amenity space to the west. This new commercial space will provide amenity for the local residents and the new school as well as better animating the streetscape with active frontage.

We anticipate that the proposed employment will increase, as a minimum of 2 people will be required to operate both units, as opposed to the single employer at the existing industrial unit. Therefore this proposal offers a significant improvement over the existing townscape condition and will not result in any loss of employment.

It is also worth noting that Policy 4 of the St Albans Local Plan (1994) confirms that within towns there will be a presumption in favour of housing development subject to consistency with other policies in the Plan. The National Planning Policy Framework (NPPF) 2019 is supportive of housing within urban areas and on previously developed land.



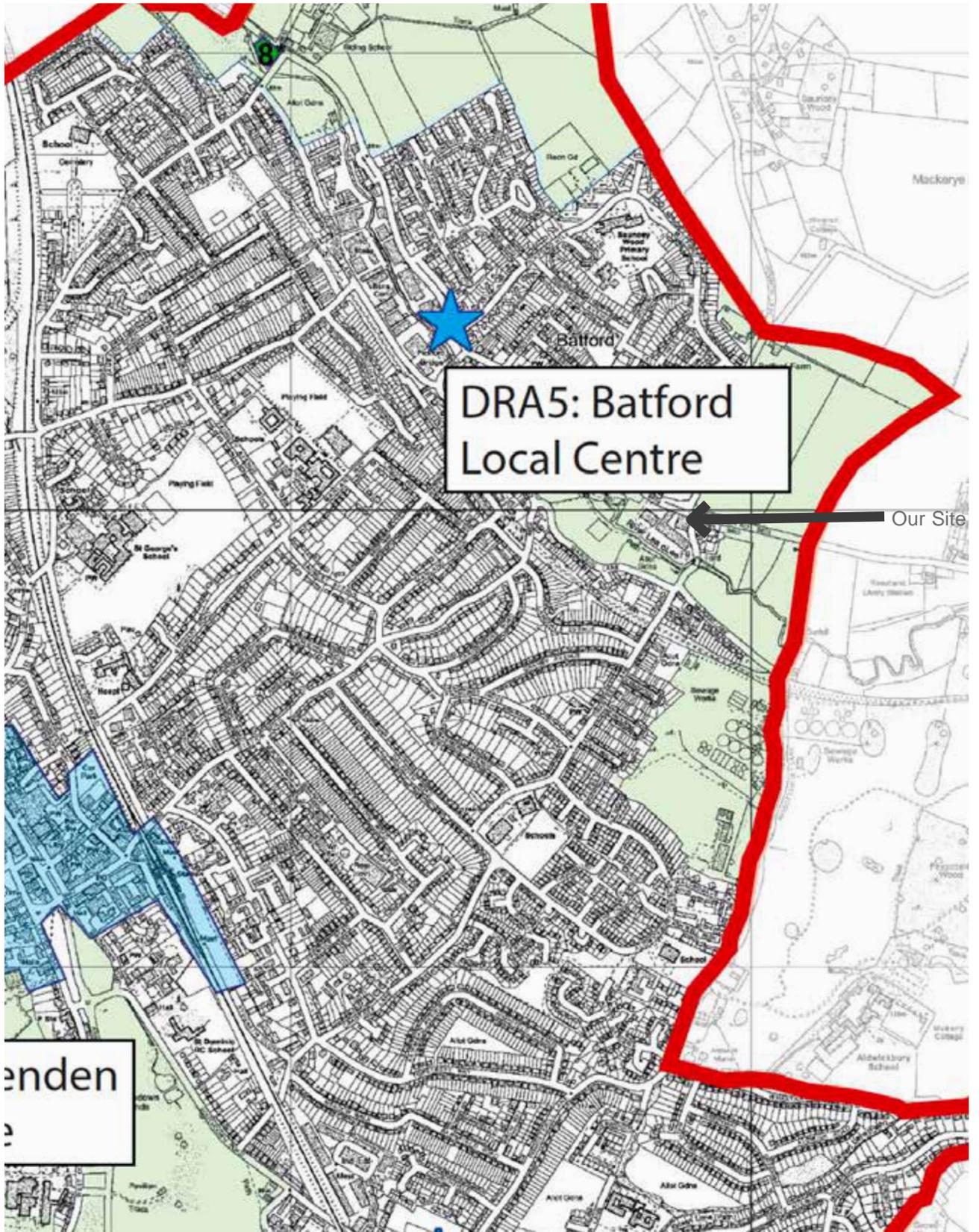
Map Extract from HNP - Figure 5.1. Designated Employment Locations

*“ER6 – Supporting Local Centres In local centres, appropriate and proportionate proposals for local retail facilities and service development will be supported. Proposal involving the loss of a convenience shop without re-provision in the same local centre will not be supported.”*

*“5.12 New convenience shop proposals in local centres must demonstrate adequate servicing arrangements and be supported by a limited amount of on site parking. Appropriate proposals to improve servicing at convenience shops in Local Centres will be supported.”*

The new commercial units offer five designated car parking spaces within the development for customers. This is as per St Albans Draft Local Plan guidance and equates to 1 space per 30sqm GFA for the retail unit and 1 space per 22sqm GFA of D2 Leisure space.

Please see submitted transport assessment for further details on the servicing strategy. (Document: Batford Mill - TS - Final V1)



Map Extract from HNP - Figure 5.2. Designated Retail Areas

## 6. Environment and Sustainable Design

### *“ESD1 – Design Strategy*

*All developments must be visually attractive, designed to a high quality; maintain or enhance the character of the area and support Harpenden as a low carbon place to live and work.”*

We believe this scheme will be a high quality development acting as a gateway to Harpenden from Lower Luton Road and will compliment not just the historic surrounding context but also the new school buildings opposite. It will replace an ugly and introverted industrial building and enhance this important corner.

The proposal is sympathetic to the local context in materials used, roof forms and heights. However the scheme is also contemporary in its detailing and fenestration. An appropriate 21st century interpretation of a mill site.

*“For major developments in the Neighbourhood Plan Area, a Design Brief must be prepared and submitted in support of the planning application.”*

As part of the application submission we have included a Sustainability Statement that specifically addresses the HNP. (Document: 1497-Sustainability-Report-B)

### *“ESD2 – Local Character and Heritage*

*i. The height, scale and design of all developments must be considerate of and make a positive contribution to local character and heritage, maintaining or enhancing positive elements and seeking to address negative elements.”*

See paragraph one above for statement to the design quality.

*“ii. Proposed developments affecting the fabric or setting of statutory listed buildings, structures, parks or gardens or affecting the appearance of the Harpenden Conservation Area must provide a Heritage Statement that assesses and outlines the significance of those heritage assets affected.”*

The proposed development sits adjacent to a listed cottage building. As part of the application submission we have included a Heritage Statement that specifically addresses the HNP. (Document: 0101BBM Batford heritage statement)

### *“ESD3 – Shopfronts*

*Proposals to create new or alter existing shopfronts will be welcomed where the design contributes to the attractiveness of the shopping area. Traditional timber shopfronts with large unobstructed windows are favoured.”*

*“Any advertisements in or on shopfronts should be modest, particularly in the Conservation Area or where the proposal will affect a Listed Building.”*

New shopfronts are proposed to the commercial units, which offer integrated signage zones for subtle advertising and large unobstructed glazed windows to create elegant active street frontage.

### *“ESD5 – New Car Parking Design*

*Parking, garages and servicing/ delivery yards for new development must be visually attractive or concealed by attractive design features. Cars must not dominate public areas and pedestrian and vehicular conflict must be minimised.”*

The car parking is all to the rear of the development and has been broken up with soft landscaping and

footpaths. The pedestrian routes will be clearly marked and offer separate and safe passage around and through the site, which is a stark contrast from the existing scenario, especially on to Crabtree Lane. A new pedestrian route has been created from Lower Luton Road, into the communal green space and also serves the commercial units. The route also links the bike and refuse stores and is completely separate from any vehicular roadways.

*“ESD6 – Refuse and Recycling*

*All proposals involving the creation of new residential units or non-residential floorspace must ensure sufficient bin capacity for waste and recycling is provided. Applicants must engage with St Albans City and District Council to confirm this. Storage must be incorporated, which should obscure views of bins from the public realm. Bins should be stored in a location where collection can take place conveniently without causing unacceptable disruption to road users and, where possible, should be secure.”*

Integrated and appropriately sized refuse stores have been provided within the site for both residential and commercial uses. These stores are of solid construction and form part of the buildings or surrounding garden walls. They will be secure and robust and are easily accessible for both users and refuse collection.

*“ESD8 – Green and Open Spaces and Areas of*

*Ecological and Landscape Value Developments must seek to maintain and enhance the quality and character of the varied open and green spaces, river corridors and the natural environment within the Neighbourhood Plan area. Development should not result in the loss of or significant harm to ecological or landscape value of the varied green spaces, river corridors and natural environment.”*

*“Significant developments must include proportionate new public open spaces, including green spaces, which should be linked where possible to create green corridors.”*

In contrast to the existing site condition of hard surfacing (mainly tarmac and concrete) the proposal seeks to add significant soft landscaping to the site. Generous gardens are at the rear of every townhouse and shared amenity space is included alongside the apartment building. The car parking is broken up with planting and has a border to the southern edge. The site is also less than 2 minutes walk to the common land and nature reserve to the south.

*“ESD9 – Key Views*

*The Harpenden Neighbourhood Plan area includes the following Key Views, which are shown in Figure 6.2:*

- 1. The Common*
- 2. The High Street*
- 3. Batford Springs*
- 4. Kinsbourne Green Common*

*Development proposals affecting key views must be supported by evidence that illustrates how the positive aspects of key views to and from these locations, including attractive green spaces and important townscape features such as landmark and gateway buildings, will be protected.”*

The development will not exceed the height of adjacent buildings (the old mill and the residential development opposite at Lea Springs) and is also set behind existing neighbouring industrial buildings. A mature tree line also exists to the north of the River Lea, which obscures views of the industrial buildings beyond. Therefore the development will not affect the key views from Batford Springs.

*“ESD13 – Biodiversity*

*The protection and enhancement of urban and rural biodiversity will be supported. Sites should be rigorously assessed for species present on site and proposals should not cause harm to the habitats of protected species without appropriate mitigation.*

*Efforts to enhance biodiversity, such as through the creation of new habitats, the enhancement of existing sites and the development and implementation of ecological management plans will be supported, particularly where these can be conveniently and viably provided as an alternative to a feature that has less biodiversity value. Green roofs and walls will be encouraged where appropriate.*

*Design and landscaping of proposed developments should be formed in the context of biodiversity conservation. Major developments should incorporate design features which support local wildlife such as incorporating swift bricks and swift or bat boxes in developments.”*

As previously mentioned, in contrast to the existing site condition of hard surfacing (mainly tarmac and concrete) the proposal seeks to add significant soft landscaping to the site. Generous gardens are at the rear of every townhouse and shared amenity space is included alongside the apartment building. The car parking is broken up with planting and has a border to the southern edge. All of these new interventions help provide more opportunity for biodiversity and new habitats.

As part of the application submission we have included an Ecology Statement. (Document: 14-06-2019 - Batford Mill - PEA-1) The ecology survey demonstrated the lack of biodiversity in the existing site.

*“ESD15 – Sustainability and Energy Efficiency*

*All development must support the objectives of making the Neighbourhood Plan Area a low carbon area, supporting sustainable living, sustainable working and sustainable leisure and mitigating the impacts of climate change.”*

As part of the application submission we have included a Sustainability Statement that specifically addresses the HNP. (Document: 1497-Sustainability-Report-B)

*“ESD16 – Carbon Dioxide Emissions*

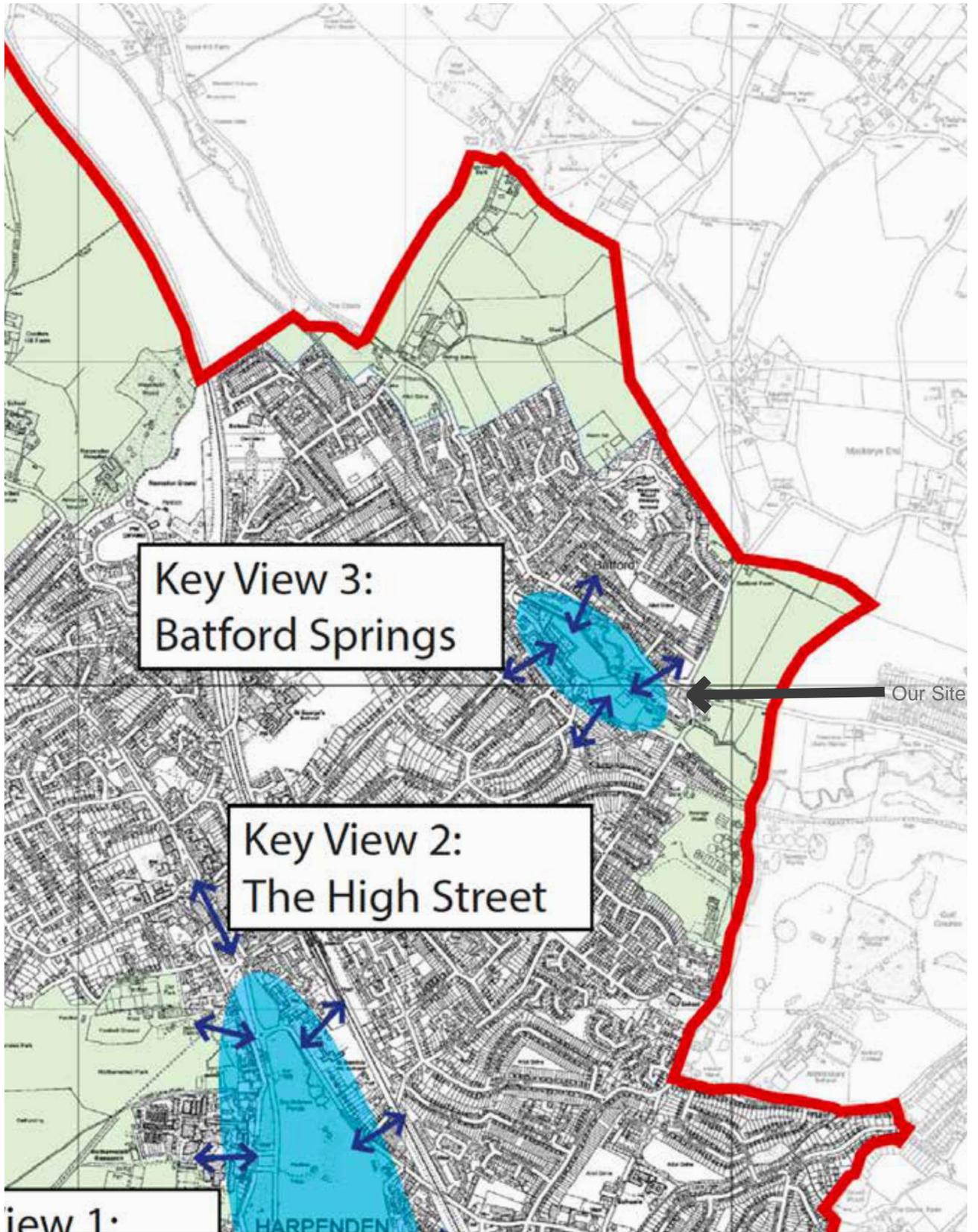
*Major developments must demonstrate an improvement to the baseline Target Emission Rate for carbon dioxide emissions as set out in Building Regulations.”*

As part of the application submission we have included a Sustainability Statement that specifically addresses the HNP. (Document: 1497-Sustainability-Report-B)

*“ESD18 – Flood Risk*

*Proposals must incorporate a sustainable and integrated approach to the management of flood risk, surface water (including run off) and foul drainage. These proposals should be robust to the expected impacts of climate change.”*

The house thresholds are at a level of 84.9, which takes them out of the flood risk zone. The flood risk assessment accompanies this application and provides further details (Document: Batford Mills Flood Risk Assessment 230819).



iew 1:  
Map Extract from HNP - Figure 6.2. Key views

## 7. Housing

*“HO1: Provide a mix of housing that meets current gaps in housing market specifically 1 to 2 bed flats/bungalows and 2 to 3 bedroom family homes.*

*HO2: Encourage starter homes and intermediate housing including support for key workers.*

*HO3: Support the ability for older people to downsize should they wish to.*

*HO4: Support the redevelopment of housing stock that is coming to the end of its lifespan.”*

The proposed housing within the site is designed to comply with minimum space standards as set out in the NPPF. A mix of unit sizes is provided ranging from 1 and 2 bed flats to 3 and 4 bed family homes. This will create a healthy mix of residents within the development and provides for a variety of potential residents i.e from older single residents through to young families and even employees from the new local school.

### *“H1 – Housing Strategy*

*New residential development should be delivered on sites allocated in the Neighbourhood Plan (and subsequently a future St Albans Local Plan) and infill and brownfield development.”*

This proposed development is on a brownfield site, currently used for light industrial/storage and would comply with this objective.

### *“H3 – Dwelling Size and Type*

*Major residential developments are required to submit a Dwellings Mix Strategy as part of the Design and Access Statement with any planning application. The strategy must clearly demonstrate how the proposed development addresses the objectively identified need for different sized and types of housing as set out in the latest assessment of housing need carried out by St Albans City and District Council. Proposals that are not considered to meet an identified size/type need will not be supported.”*

A full area schedule with flat mix breakdown is included within the Design and Access Statement on page 28. The flat mix gives a high proportion of family units, which is appropriate for the area and vicinity to the new local school.

### *H7 – Lifetime Homes*

*New housing should be capable of meeting the changing needs of residents over their lifetimes. It should be accessible to those with limited mobility and capable of adaptation for residents who are wheelchair users.*

*On major housing developments, at least 10% of homes shall be built to be ‘Wheelchair Adaptable’ as defined by Building Regulations M(2) or whatever standard supersedes it.*

Flats J and M within the apartment building have been allocated as wheelchair adaptable and for the 10% allowance. They are oversized by 10sqm and include the required storage areas and turning circles within the living spaces.

### *H9 – Private Outdoor Space for Residential Development*

*Appropriate private outdoor space must be provided for all new dwellings. In exceptional circumstances in the case of flats, providing this as shared amenity space may be acceptable.*

Private amenity space has been provided for every dwelling, with balcony spaces to each flat complying with minimum standards. Each townhouse has an appropriate private garden for the house type and the nearby common land and nature reserve are only a couple of minutes walk away. The amenity space is of a high quality, being private and well proportioned.

- 5- Black Timber
- 6- Brick Garden
- 7- Recessed
- 8- Red Brick
- 9- Slate Tiles



BATFORD MILLS  
 PLANNING APPLICATION  
 PROPOSED ELEVATIONS  
 172-BMH\_07\_211  
 SCALE: 1:200@A3

- 1- Black Timber Door
- 2- Fairfaced Concrete Lintel
- 3- Brick Lintel
- 4- Dark Grey Aluminium Framed Windows
- 5- Black Timber Spandrel Panel
- 6- Brick Garden Wall
- 7- Recessed Brickwork
- 8- Red Brick
- 9- Slate Tiles

- 10- Rooflights
- 11- Recessed Concrete Panel
- 12- Fairfaced Concrete
- 13- PPC Metal Cladding
- 14- PPC Metal Louvred Door
- 15- Metal Balustrade
- 16- Signage Zone
- 17- PPC Metal Louvres
- 18- Operable Timber Panel

## 9. Transport and Movement

*“TMO1: Create an environment that promotes walking, cycling and public transport as first choice modes for all residents and ensure that the services supporting these modes are in place, from high quality safe routes to reliable and sustainable transport services.”*

*“TMO2: Integrate modes of transport, for example through strategically located cycle storage.”*

A high quality, covered and secure cycle store has been provided on site, located within the communal amenity space. This caters to all the residents and is accessible from a safe pedestrianised area. Additional cycle hoops are provided within the landscape for visitors and customers of the commercial units.

### *“T1 – Transport Assessments*

*Major development proposals or other proposals that would cause a significant amount of transport movement will be supported by a Transport Assessment, which must demonstrate predicted levels of traffic generated from the proposed development and the impacts of this additional traffic on roads and junctions within the Harpenden Neighbourhood Plan Area. “*

Please see submitted transport assessment for further details on the servicing strategy. (Document: Batford Mill - TS - Final V1

