

St Albans City and District Local Plan

Statement

Stage 1 Matter 2, Issues 4 and 5

On behalf of

The Trustees of the G A Simons Family Settlement

Land Common Lane, Harpenden

(Reg 19 Sub 69)

This Statement should be considered in conjunction with the Reg 19 Sub 69 with it's attached appendices.

**Issue 4: Distribution of Housing Growth.**

*Q4 Has the Council identified land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, as required by Para 70 of the Framework?*

1) It is a requirement of Para 70 for a Local Plan to identify not less than 10% of the housing requirement on sites no larger than 1 hectare. The Para starts that small and medium sized sites are important and are often built out relatively quickly. A purpose is to assist the early delivery of housing given the timescales involved in the strategic and larger schemes and also provides opportunities for small and medium enterprises. The housing trajectory indicates that the Urban Capacity sites, much of which are Council controlled will not start delivering housing until post 2030 and then for a 3 year period before tailing off. Given these are urban sites not dependent upon the new local plan, the delay in delivery defeats a reason for small sites.

2) To date we have not found a document which sets out clearly how the Council has achieved the requirement.

3) The Housing Trajectory Part A page 26 Table 3.2 provides for 14,989 dwellings during the plan period, which includes the buffer (Requirement is 14,603). The trajectory shows that most sites do not start delivering until 2030 and it is heavy geared to the middle to late plan period for delivery with a substantial deficit up until then.

4) The trajectory includes the Harpenden N.P. of 57 dwellings. The Harpenden N.P. includes the Pan Auto site which is being developed as a Use Class C2, Care Home, not Use Class C3. Westfield Allotments and Noke Shot have been developed, Our assessment is that the Harpenden N.P. provides for 28 dwellings on small sites.

5) The Councils Housing requirement of 14,603 includes within the trajectory a) windfall sites of 2,103 and b) permissions 2,365. It is not known to what extent the permissions are on sites of less than 1 hectare. Windfalls are referred to in Section 5 of the "Housing Land Supply Windfall and Housing Capacity" and whilst Council appears to indicate these are mainly expected on sites of less than 1 hectare, they are by their nature indeterminate. Only 653 provided in the first 5 years.

6) The requirement under the Framework is therefore to provide 1,460 dwellings on sites of less than 1 hectare.

7) An assessment of the Councils figures are calculated in **Appendix 1**. Whether it is correct to include self-build /custom build as part of the Para 70 requirements is open to debate. They may be in addition to Para 70. If the basis is correct, it shows the Council has achieved the requirement, however the Council should produce a report based upon reliable evidence how it intends to achieve the Para 70 requirement. .

8) Our analysis in **Appendix 1** demonstrates that the majority of sites of less than 1 hectare are either Windfall (indeterminate and speculative) and the Urban Capacity Sites (2 are over 1 hectare). The self- build/custom build are linked to sites of over 100 units and with the exception of H.G.C ,these do not start delivering until 2032.

9) Many of the Urban Capacity Sites are under Council control. Site visits will identify there are substantive commercial, highway and planning issues which will make a number of the sites undeliverable. This will impact upon the overall housing numbers and housing trajectory.

10) A number of sites relate to the Council's city car parks. These are mostly at full capacity during peak periods. The Council had previously indicated there would be no loss of car parking provision. To accomplish this would require decked car spaces. This is expensive and impacts on viability. The Council has not produced any feasibility assessment relating to the viability of sites for re- development. This is of significant concern if the Council is heavily relying on these sites to meet the obligations of the overall housing and the requirement of Para 70.

11) Sites which are in commercial use will only come forward when it is viable to do so. We have strong reservations that the car parks serving Sainsbury and Waitrose will come forward given they are essential for trading. The loss of used community facilities is likely to be strongly resisted and politically unacceptable. Site UC8 for 24 units has planning permission for change of use to a place of worship, so should be removed from the list.

12) A carriageway width of 4.1 metres plus a footpath/verge would be a requirement for small developments. Examples of the garage court site accesses, which have been investigated (see **Appendix 2**) are sub- standard for residential development purposes; in some cases ,only having an access width of 3.1 metres. What may have been a



suitable width access for garage blocks in the 1950's, is simply not suitable and does not meet the requirements for a residential scheme. In addition to the narrow accesses, radius curves are needed to provide for the ability of service vehicles to enter and exit the site. This cannot be achieved given the adjoining ownerships and distance from boundary to highway kerb. In addition, consideration needs to be given for delivery vehicles in particular waste disposal and manoeuvrability. The distances in the Building Regs for householders is a max carting distance of 25 metres, but Councils also require maximum distances for reversing vehicles (where no turning head is provided) and operative carting distances.

13) Many of the urban sites of less than 1 hectare comprise of garage courts, often in back land locations with poor access. Many are subject to established rights of access to neighbouring properties which will hinder or prevent development. In our opinion such sites are unlikely come forward due to the constraints of access, existing rights, detrimentally impacting upon the character of the surrounding area and overlooking /privacy issues. The displacement of vehicles using the garage courts will increase "on street" parking often where there is already pressure for spaces. Whilst we have not undertaken a trawl all the sites, we simply identify a number of examples in **Appendix 2**.

14) It should be noted that the Councils planning web site indicates that so far no planning applications have been submitted on these sites, nor many others notwithstanding they are all in the urban area and are not reliant on a new local plan. This does not bode well for meeting housing delivery, where the Council already has a substantial shortfall.

15) Whilst the Council has listed sites which may go some way to meeting Para 70, many of these will not in our opinion be deliverable for various reasons. The Council is overly optimistic in its delivery assessment of sites. This is largely supported by the fact that to date there has been an absence of planning applications in nearly all cases.

## **Issue 5: Site Selection Methodology**

*Q1 What were the reasons for discounting sites at the initial assessment stage. Was this done on a consistent and transparent basis?*

16) A review of the Local Plan Site Selection Proforma Sheets shows an inconsistency of approach in the list of proposed sites in the Small Medium Allocations. We provide in the table **Appendix 3**, the scoring of each of the sites the Council is taking forward. Our clients' sites (**Appendix 4**) scored Strong 23, Medium 5, Weak 3.

17) It will be noted that whilst our clients site performs better than all the sites recommended to progress, it nevertheless failed to be taken forward. This can only be as a result of the Green Belt Study. The fact the site did not score well in the Green



Belt Study is because it was not assessed independently, but rather it was only considered as part of a much wider area. The failure to take a more finer grain approach (a criticism of the last failed plan) means sites which independently do not serve the 5 purposes for including land in the Green Belt have not been taken forward. This is the subject of separate submissions in relation the Green Belt Hearing, Matter 3.

*Q3 What was the justification for using distances when determining accessibility? How were other factors taken into account such as the ability to access services and facilities by walking, cycling and public transport?*

18) The cut off distances between what is a weak score and what is medium or strong score are fairly arbitrary with no shades of grey. A numerical scoring would have been more relevant. Moreover, the scoring assumes that each of the criteria listed is of equal planning importance, whereas Para 11 of Framework 2023 places a presumption in favour of sustainable development. There are the errors in the distances. This misleading information may have had a bearing on how the Council has decided which sites to allocate. If the Council uses distances, they at least should be correct, otherwise it becomes an issue of the credibility of the evidence which gave rise to the decisions. As an example, in respect of our client's site it states it 640 metres from a primary school whereas it is 490 metres from primary and nursery schools. It states it is 100 metres from a secondary school whereas it adjoins the school. It states it is 110 metres from a Bus Stop whereas there is one adjacent to the site frontage. Whilst in this case none of these have affected the "Strong" scoring of the sites, it raises questions of credibility of the evidence.

*Q8 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?*

19) The site selection process included the evidence from the Green Belt Study. A study which did not consider my clients land individually but included it within a much wider area. On this point alone the process cannot be considered robust. A site visit will substantiate that my clients land no longer performs the 5 purposes for including land in the Green Belt, especially when reviewing it against for instance the examples for proposed Green Belt releases and site allocations, Lower Luton Road, Harpenden, (Part B of the plan site M 25, also SA 32 of Green Belt Study) and Amwell Top Field, Wheathampstead (Part B of the plan site M 9, also SA 53 of the Green Bely Study) (**Appendix 5**) to name but two.

20) The fact is that notwithstanding our client's site was not recommended in the Green Belt Study Stage 2 in all other respects it had a much higher scoring than all the Medium & Small Sites Recommended to Progress. Our clients site scored 23 strong, 5 medium and 3 weak. One of the weak scores relates to having no branch line railway station nearby. Why this should be important if there is a main line station on the St Pancras line nearby is obscure, or why the Main Line Station and Branch Line Station, should apparently carry the same weighting.

## Appendix 1

Analysis of the Councils delivery rates for sites of less than 1 hectare. This assumes Self Build and Custom housebuilding is included and all windfall sites. The figures are taken from Housing Trajectory Table, Part B Table A1.1 and the proforma's in Part B.

Hemel Garden Community	4,300 x 3%	= 129
Broad Locations	4,007 x 3%	= 120
Large Sites over 100	385 x 3%	= 12
Windfall Sites (Part A Table 3.2 p26)		2,103
Harpenden N.P.		28
Medium Sites less than 1 hectare		
M19		29
M20		25
M22		15
M25		8
Urban Sites less than 1 hectare		
U2		28
U3		10
U4		5
Urban Capacity Sites less than 1 hectare		
See attached sheet		673
		-----
Total		3,185



## Urban Capacity Sites – Recommended to Progress

**Table 1 - Summary of proformas contained within this document**

Site Reference	UCS Reference	Site Address	Hect	Units
UC1	UCS-SA-SD-051	Sainsbury's Supermarket, Everard Close, St Albans AL1 2QU		
UC2	UCS-SA-HD-008	Civic Close Car Park, Bricket Road, St Albans, AL1 3JX	0.45	57
UC3	UCS-SA-HD-022	London Road Car Park, London Road, St Albans, AL1 1NG	0.57	36
UC4	UCS-SA-HD-013	Car Park to rear of 32-34 Upper Marlborough Road, St Albans, AL1 3UU	0.22	16
UC5	UCS-SA-HD-018-v2	18 - 20 Catherine Street St Albans, AL3 5BY	0.43	33
UC6	UCS-SA-HD-029-v2	13-19 Sutton Road & 5-11a Pickford Road, St Albans, AL1 5JH	0.32	29
UC7	UCS-SA-HD-014	5 Spencer Street, St Albans, AL3 5EH	0.19	27
UC9	UCS-SA-HD-023	Keyfield Terrace Car Park, Keyfield Terrace, St Albans, AL1 1PD	0.15	10
UC11	UCS-SA-HD-021-v2	50 Victoria Street St Albans, AL1 3HZ	0.07	6
UC16	UCS-SA-HD-041	Garage Block west of Thirlestane, Thirlestane, St Albans, AL1 3PE	0.18	16
UC18	UCS-SA-HD-051	Garage block to front of 94-142 Riverside Road, Riverside Road, St Albans, AL1 1SE	0.4	13
UC19	UCS-SA-HD-044-v2	50 - 54 Lemsford Road, St Albans, AL1 3PR	0.53	43
UC21	UCS-SA-SD-007	Garages off Chapel Place, St Albans, AL1 2JZ	0.23	11
UC22	UCS-SA-HD-058	Car Park to rear of 77-101 Hatfield Road, Hatfield Road, St Albans, AL1 4JL	0.1	9
UC23	UCS-SA-HD-002	Garage Site adj. Verulam House, Verulam Road St Albans, AL3 5EN	0.13	9
UC24	UCS-SA-SD-034	Garages Rear of Hill End Lane (North), St Albans, AL4 0AE	0.21	8
UC28	UCS-SA-SD-050	New Greens Residents Association, 2 High Oaks, AL3 6DL	0.20	10
UC30	UCS-SA-SD-011	Garages Between Abbots Avenue West and Abbey Line, St Albans, AL1 2JH	0.4	5
UC31	UCS-SA-SD-048	Garages rear of Tudor Road, St Albans, AL3 6AY	0.17	9
UC32	UCS-SA-SD-013	Garages off Creighton Avenue, St Albans, AL1 2LZ	0.14	5
UC34	UCS-SA-SD-033	Garages Rear of Hill End Lane (South), St Albans, AL4 0AE	0.19	7
UC35	UCS-SA-HD-015	Market Depot Drovers Way, St Albans, AL3 5FA	0.07	11
UC40	UCS-SA-SD-027	Land Rear of New House Park Shops, St Albans, AL1 1UJ	0.12	6
UC41	UCS-SA-SD-016	Garages at Grindcobbe, St Albans, AL1 2ED	0.12	6
UC42	UCS-SA-SD-046	Garages off Thirlemere Drive, St Albans, AL1 5QS	0.4	6
UC43	UCS-SA-HD-055	Garage block to west of 32-46 Riverside Road, Riverside Road, St Albans, AL1 1SD	0.06	5
UC45	UCS-SA-SD-003	Garages off Watling View (West), St Albans, AL1 2PA	0.11	5
UC48	UCS-SA-HD-016-v2	Car Park adj. to 42-46 Adelaide Street, St Albans, AL3 5BH	0.12	6
UC51	UCS-SA-HD-050	Garage Block to south of Abbots Park, St Albans, AL1 1TW	0.06	5
UC55	N/A	44-52 Lattimore Road, St Albans, AL1 3XW	0.11	17
UC56	N/A	Garages to the rear of Portman House, Therfield Road, St Albans, AL3 6BN	0.11	6
UC57	N/A	Telford Court, Alma Road, St Albans, AL1 3BP	0.58	6
UC58	N/A	Cotlandswick Garages B, London Colney, AL2 1EG	0.12	5
UC8	UCS-HT-HD-011	Public Hall 6 Southdown Road, Harpenden, AL5 1TE	0.26	24
UC14	UCS-HT-HD-035	Car Park to rear of 3 Church Green, Harpenden, AL5 2TJ	0.34	17
UC15	UCS-HT-HD-037	Bowers Way East Car Park, Bowers Way, Harpenden, AL5 4EQ	0.41	32
UC29	UCS-HT-SD-015	Garage Block off Noke Shot, Harpenden, AL5 5HS	0.16	8



UC44	UCS-HT-SD-013	Garage Block off Milford Hill, Harpenden, AL5 5BN	0.07	5
UC46	UCS-HT-SD-004-v2	Garage Blocks adj. to 76 Oakley Road and 151 Grove Road, Harpenden, AL5 1HJ	0.12	6
UC47	UCS-HT-SD-018	Crabtree Fields/ Land at Waldegrave Park, Harpenden, AL5 5SA	0.88	5
UC50	UCS-HT-HD-010	Southview Car Park, Lower Luton Road, Harpenden, AL5 5AW	0.1	5
UC52	UCS-HT-SD-012	Garage Block off Tallents Crescent, Harpenden, AL5 5BS	0.1	5
UC54	N/A	Harpenden Railway Station Car Park East, Harpenden, AL5 4SP		
UC17	UCS-LD-SD-017	Garage Block off Cotlandswick, London Colney, AL2 1ED	0.11	5
UC20	UCS-LD-SD-021-v2	104 High Street, London Colney, AL2 1QL	0.27	21
UC27	UCS-LD-SD-024	Berkeley House, Barnet Road, London Colney, AL2 1BG	0.14	8
UC33	UCS-RB-SD-003	Land Rear of 53 Snatchup, Redbourn, AL3 7HF	0.16	5
UC10	UCS-SAN-SD-004	Garage Block rear of 109-179 Hughenden Road, St Albans, AL4 9QW	0.27	24
UC12	UCS-SAN-SD-003	Garage Block Between Hughenden Road and The Ridgeway, St Albans, AL4 9RH	0.22	20
UC26	UCS-SAN-SD-015	Garage Block to Malvern Close, St Albans, AL4 9SZ	0.13	9
UC49	UCS-SAN-SD-017	Garage Block rear of 18-30 Furze Avenue, St Albans, AL4 9NE	0.12	5
UC25	UCS-CG-SD-009	318 Watford Road, Chiswell Green, AL2 3DP	0.19	10
UC36	UCS-PS-SD-004	Garages off Park Street Lane, Park Street, AL2 2ND	0.67	5
UC53	N/A	Motor Repair Garage, Paynes Yard, Park Street Lane, AL2 2NE	0.22	11

N.B. Maps within this document contain public sector information licenced under the Open Government Licence V3.0. © Crown copyright and database rights 2024 Ordnance Survey AC0000819589.

Total

673



## Appendix 2

**Review of sites included in the Urban Capacity Study for development using a few examples to test the robustness of the evidence.**

**UC18** 94-142 Riverside Road, St Albans. Comprises the re- development of car spaces used by the blocks of flats and the decked car parking above. The displacement of car parking onto Riverside Road will create adverse consequences and pressure given the existing double banked street parking. Residents likely to fiercely oppose.

**UC 24** Hill End Lane (North), St Albans. A long narrow site where development will be challenging. Provision will need to be made for a refuse vehicle to be able to turn within the site.

**UC 33** Snatchup, Redbourn. Sub -Standard access width of 4.0 metres. Six of the 26 garages boarded. Also used as access to other properties where rights would restrict development. Not deliverable.

**UC 29** Noke Shot, Harpenden. Sub- standard access width of 3.75- 3.95 metres. Long access with sharp bend and very limited forward visibility. Also used by properties which back onto the site and access rights will restrict the ability to develop. Twenty garages in 3 blocks all appear to be used. Not deliverable.

**UC 42** Thirlmere, Drive, St Albans. Sub -standard width of access 3.95 narrowing the less than 3.5 metres. Not deliverable.

**UC 44** Milford Hill, Harpenden. Sub -standard access 3.1 metres wide. Twenty garages all appear to be used. Also used to access rear of neighbouring properties. Not deliverable.

**UC 49.**Rear of 18-30 Furse Avenue. Sub -standard access width of 3.4 metres. Of the 56 garages 15 are boarded. Not deliverable

**UC 51** Abbots Park, St Albans. The estate is already heavy congested with on street parking which block vehicle movements. The displacement of cars from the garages will exacerbate an already unsatisfactory position. The site adjoins the main line railway and achieving a development which complies with the noise standards for dwellings is unlikely. Very doubtful this is a suitable residential location. What may have been acceptable



historically does not mean it meets current policy or regulations. There will be an increase in the rail activity given the new National Rail Freight Depot to the south. The BS8233 "Guidance on sound insulation and noise reduction for buildings" sets the design criteria as follows :-

	07:00 to 23:00	23:00 to 0.700
Living Room	35dB LAeq 16 hour	
Dining Room	40dB LAeq 16 hour	
Bedroom	35dB LAeq 16 hour	30dB LAeq 8 hour

External noise levels are also included and these should not exceed 50 dB LAeq. The narrow site has little distance for introducing noise mitigation

**UC 56** R/O Portman House, Therfield Road, St Albans. Sub-standard access width of 3.9 metres. Eight of the 33 garages boarded. Not deliverable.

## Appendix 3



## Medium & Small Sites – Recommended to Progress

Table 1 - Summary of proformas contained within this document

Site Reference	HELAA Reference	Site Address	Scores		
			Weak	Medium	Strong
C-001	CH-01-21	North East of Austen Way, St Albans, AL4 0XH	9	11	11
C-012	CH-12-21	Land North of Boissy Close, AL4 0UE	9	7	15
C-037	HR-02-18	Wood End, Hatching Green, Harpenden, AL5 2JT	4	11	16
C-050	HT-04-21	Falconers Field, Harpenden, AL5 3ES	6	7	18
C-055	HT-11-21	Piggottshill Lane, Harpenden, AL5 5UN	3	13	15
C-056	HT-12-21	Baulk Close, Harpenden, AL5 4LY	2	14	15
C-057	HT-13-21	Townsend Lane, AL5 2RQ	6	10	15
C-067	HT-22-18	Rothamsted Lodge, Hatching Green, AL5 2JS	7	8	16
C-064	HT-20-21	Lower Luton Road, Harpenden, AL5 5AF	4	10	17
M-016	R-18-21	South of Harpenden Lane, AL3 7RQ	12	6	13
C-135	SA-18-21	Bedmond Lane, AL3 4AH	8	10	13
C-299	SA-07-21	Verulam Golf Club, London Road, St Albans, AL1 1JG	4	9	18
O-028	STS-30-21	North of Oakwood Road, Bricket Wood, AL2 3PT	6	5	14 *
C-237	STS-54-21	Bucknalls Drive, Bricket Wood, AL2 3YT	9	9	13
C-240	STS-57-21	Ashdale Lye Lane, Bricket Wood, AL2 3LQ	9	6	16
C-210	STS-32-18	Tippendell Lane and Orchard Drive, How Wood, AL2 2QF	6	5	20
C-286	WH-32-21	North of Wheathampstead Road, Harpenden, AL5 1AB	5	11	15
C-283	WH-28-21	Hill Dyke Road, AL4 8TR	7	9	15
C-280	WH-24-17	Amwell Top Field, Wheathampstead, AL4 8DZ	8	10	13

N.B. Maps within this document contain public sector information licenced under the Open Government Licence V3.0. © Crown copyright and database rights 2024 Ordnance Survey AC0000819589.

\* Commercial

## Appendix 4

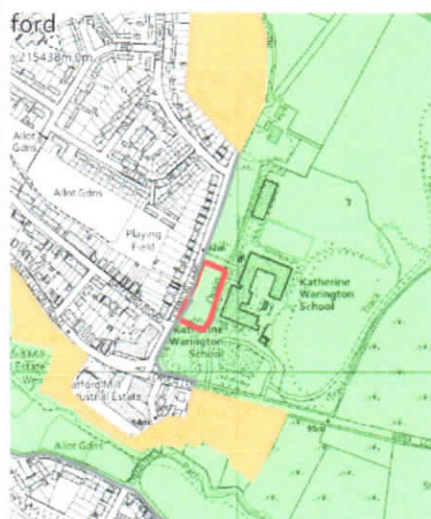


### Local Plan Site Selection Proforma Sheet

Site Ref	HELAA Ref	Green Belt Sub-Area Ref	Site Address	Parish	Area in Ha	Current land use	Proposed use
C-054	HT-06b-21	SA-29 / Not recommended	Site B Common Lane, St Albans, AL5 5BU	Harpenden Town	0.28	Scrubland	Primarily residential

### Location of Site

Green Belt Settlement Buffer Map



#### Legend

- Local Authority Boundary
- HELAA Site Boundary
- Urban Settlement
- Metropolitan Green Belt
- Green Belt Study Recommended Area
- Green Belt Study Settlement Buffer (250m)
- Green Belt Study Settlement Buffer (400m)

Constraints Site Map



- Flood Zone 2
- Flood Zone 3
- Flood Zone 3b
- Conservation Areas
- Listed Buildings
- Grade I
- Grade II
- Grade II\*
- Locally Listed Buildings
- Scheduled Ancient Monuments
- Metropolitan Green Belt
- Ancient Woodlands
- Registered Parks and Gardens
- Local Nature Reserves
- Site of Special Scientific Interest

Aerial of Site



© Bluesky International Ltd. / Getmapping PLC

### Description of Site

The site is located to the east of Harpenden Town. Residential properties are located to the west of the site across Common Lane. To the south and east of the site is Katherine Warrington School.

### This site was assessed in terms of its sustainable development potential:

Location	Yes, Partially or No
Located within Green Belt Buffer or settlement area	Yes - 100%
Located on previously developed land	No - 0%
Located within Green Belt Study weakly performing area	No
Located within Green Belt Study less important area	No
Located within Green Belt Study Recommended for further Consideration area	No

### Major Policy and Environmental Constraints

Functional Floodplain (or climate change floodplain)	S
Heritage Asset or its setting	S
Ancient Woodland	S
<b>Accessibility</b>	
Distance to nearest bus stop (with at least peak hourly service)	S

Distance to nearest mainline railway station	M
Distance to nearest branch line railway station	W M/A
Distance to the nearest employment site/location	S
Distance to the strategic road network for employment sites	N/A
Distance to local centre/town centre/village centre	M
Distance to nearest infant/primary school	S
Distance to nearest secondary school	S
Distance to nearest GP surgery	M
<b>Other Key Constraints</b>	
Agricultural Land Classification	S
Nationally (European) Protected Sites (SSSI)	S
Local or Regional Nature Conservation sites	S
Priority Habitats (listed on S.41 of the NERC Act)	S
Existing Woodland	S
Archaeological Assets including their setting	S
Landscape Conservation Areas including their setting	W
Source Protection Zones	M
Access to Open Space	S
Air Quality	S
Utilities and Infrastructure	S
Tree Preservation Order (TPO) trees	S
Areas of non-designated biodiversity	W
Green Infrastructure Corridors	S M
Access to the Site	S
Contamination	S
Mineral Resource	S
Waste	S
Chiltern Beechwoods SAC Zone of Influence	S
Buncefield Protection Zone	S

<b>CRITERION BASED ASSESSMENT TOTAL</b>	<b>3 - Weak</b>	<b>5 - Medium</b>	<b>23 - Strong</b>
---	-----------------	-------------------	--------------------

### Qualitative Assessment

This site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

The site is adjacent to Harpenden, a Tier 2 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt. It is within the 400 metres Green Belt Study settlement buffer.

The site is approximately; 640 metres from a primary school, 100 metres from a secondary school, 110 metres from a bus stop, 1.8 kilometres from Harpenden mainline railway station and 550 metres from a Local Centre.

Almost the entire site is within a landscape conservation area. There are a number of mature trees along the western site boundary.

Potential access is via Common Lane.

This site is not recommended to progress.

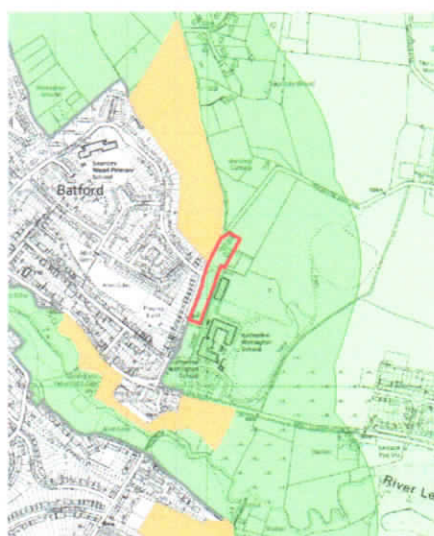


### Local Plan Site Selection Proforma Sheet

Site Ref	HELAA Ref	Green Belt Sub-Area Ref	Site Address	Parish	Area in Ha	Current land use	Proposed use
C-073	HT-28-21	SA-29 / Not recommended	Site A and C Common Lane, Harpenden, AL5 5FH	Harpenden Town	0.83	Scrubland (N.B. Residential permission 5/2021/3482 falls within part of the site)	Primarily residential

### Location of Site

Green Belt Settlement Buffer Map



#### Legend

- Local Authority Boundary
- HELAA Site Boundary
- Urban Settlement
- Metropolitan Green Belt
- Green Belt Study Recommended Area
- Green Belt Study Settlement Buffer (250m)
- Green Belt Study Settlement Buffer (400m)

Constraints Site Map



- Flood Zone 2
- Flood Zone 3
- Flood Zone 3b
- Conservation Areas
- Listed Buildings
- Grade I
- Grade II
- Grade II\*
- Locally Listed Buildings
- Scheduled Ancient Monuments
- Metropolitan Green Belt
- Ancient Woodlands
- Registered Parks and Gardens
- Local Nature Reserves
- Site of Special Scientific Interest

Aerial of Site



© Bluesky International Ltd. / Getmapping PLC

### Description of Site

The site is located east of Harpenden Town. Residential properties are located to the west of the site, across Common Lane. To the east of the site is Katherine Warington School, with fields to the north.

### This site was assessed in terms of its sustainable development potential:

Location	Yes, Partially or No
Located within Green Belt Buffer or settlement area	Yes – 100%
Located on previously developed land	Partially – 24%
Located within Green Belt Study weakly performing area	No
Located within Green Belt Study less important area	No
Located within Green Belt Study Recommended for further Consideration area	No

### Major Policy and Environmental Constraints

Functional Floodplain (or climate change floodplain)	S
Heritage Asset or its setting	S

Ancient Woodland	S
<b>Accessibility</b>	
Distance to nearest bus stop (with at least peak hourly service)	S
Distance to nearest mainline railway station	M
Distance to nearest branch line railway station	W
Distance to the nearest employment site/location	S
Distance to the strategic road network for employment sites	N/A
Distance to local centre/town centre/village centre	M
Distance to nearest infant/primary school	S
Distance to nearest secondary school	S
Distance to nearest GP surgery	M
<b>Other Key Constraints</b>	
Agricultural Land Classification	S
Nationally (European) Protected Sites (SSSI)	S
Local or Regional Nature Conservation sites	S
Priority Habitats (listed on S.41 of the NERC Act)	S
Existing Woodland	S
Archaeological Assets including their setting	S
Landscape Conservation Areas including their setting	W
Source Protection Zones	M
Access to Open Space	S
Air Quality	S
Utilities and Infrastructure	S
Tree Preservation Order (TPO) trees	S
Areas of non-designated biodiversity	W
Green Infrastructure Corridors	M
Access to the Site	S
Contamination	S
Mineral Resource	S
Waste	S
Chiltern Beechwoods SAC Zone of Influence	S
Buncefield Protection Zone	S

<b>CRITERION BASED ASSESSMENT TOTAL</b>	<b>3 - Weak</b>	<b>5 - Medium</b>	<b>23 - Strong</b>
---	-----------------	-------------------	--------------------

Qualitative Assessment
<p>This site is not recommended for further consideration by the Green Belt Review Stage 2 Report.</p> <p>The site is adjacent to Harpenden, a Tier 2 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt. It is within the 400 metres Green Belt Study settlement buffer.</p> <p>The site is approximately; 470 metres from a primary school, 210 metres from a secondary school, 70 metres from a bus stop, 2.3 kilometres from Harpenden mainline railway station and 750 metres from a Local Centre.</p> <p>The entire site is within a landscape conservation area. There are a number of mature trees along the western site boundary.</p> <p>Potential access is via Common Lane.</p> <p>This site is not recommended to progress.</p>

## APPENDIX 5

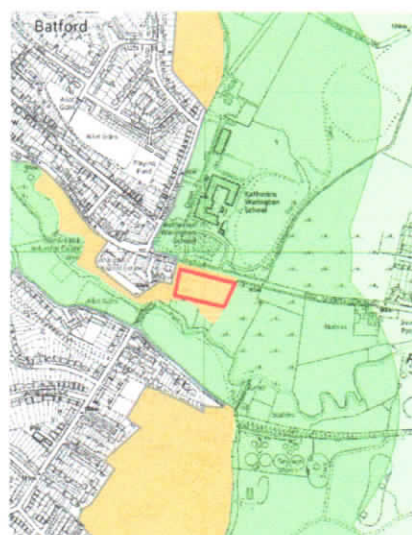


### Local Plan Site Selection Proforma Sheet

Site Ref	HELAA Ref	Green Belt Sub-Area Ref	Site Address	Parish	Area in Ha	Current land use	Proposed use
C-064	HT-20-21	SA-32 / RA-20	Lower Luton Road, Harpenden, AL5 5AF	Harpenden Town	0.74	Agricultural	Primarily residential

### Location of Site

Green Belt Settlement Buffer Map



#### Legend

- Local Authority Boundary
- HELAA Site Boundary
- Urban Settlement
- Metropolitan Green Belt
- Green Belt Study Recommended Area
- Green Belt Study Settlement Buffer (250m)
- Green Belt Study Settlement Buffer (400m)

Constraints Site Map



- Flood Zone 2
- Flood Zone 3
- Flood Zone 3b
- Conservation Areas
- Listed Buildings
  - Grade I
  - Grade II
  - Grade II\*
- Locally Listed Buildings
- Scheduled Ancient Monuments
- Metropolitan Green Belt
- Ancient Woodlands
- Registered Parks and Gardens
- Local Nature Reserves
- Site of Special Scientific Interest

Aerial of Site



© Bluesky International Ltd. / Getmapping PLC

### Description of Site

The site is located on the eastern edge of Harpenden. Lower Luton Road lies to the north of the site, with a school beyond. Residential and employment areas are located to the west of the site. The River Lea is to the south of the site, with open fields to the east.

### This site was assessed in terms of its sustainable development potential

Location	Yes, Partially or No
Located within Green Belt Buffer or settlement area	Yes – 100%
Located on previously developed land	Partially – 3%
Located within Green Belt Study weakly performing area	No
Located within Green Belt Study less important area	Yes
Located within Green Belt Study Recommended for further Consideration area	Yes

### Major Policy and Environmental Constraints

Functional Floodplain (or climate change floodplain)	M
Heritage Asset or its setting	M
Ancient Woodland	S
Accessibility	

Distance to nearest bus stop (with at least peak hourly service)	S
Distance to nearest mainline railway station	M
Distance to nearest branch line railway station	W
Distance to the nearest employment site/location	S
Distance to the strategic road network for employment sites	N/A
Distance to local centre/town centre/village centre	M
Distance to nearest infant/primary school	M
Distance to nearest secondary school	S
Distance to nearest GP surgery	M
<b>Other Key Constraints</b>	
Agricultural Land Classification	W
Nationally (European) Protected Sites (SSSI)	S
Local or Regional Nature Conservation sites	S
Priority Habitats (listed on S.41 of the NERC Act)	M
Existing Woodland	S
Archaeological Assets including their setting	S
Landscape Conservation Areas including their setting	W
Source Protection Zones	M
Access to Open Space	S
Air Quality	S
Utilities and Infrastructure	M
Tree Preservation Order (TPO) trees	S
Areas of non-designated biodiversity	W
Green Infrastructure Corridors	S
Access to the Site	S
Contamination	S
Mineral Resource	S
Waste	M
Chiltern Beechwoods SAC Zone of Influence	S
Buncefield Protection Zone	S

<b>CRITERION BASED ASSESSMENT TOTAL</b>	<b>4 - Weak</b>	<b>10 - Medium</b>	<b>17 - Strong</b>
---	-----------------	--------------------	--------------------

Qualitative Assessment
<p>The site is recommended for further consideration by the Green Belt Review Stage 2 Report.</p> <p>The site is relatively close to Harpenden, a Tier 2 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt. It is within the 400 metres Green Belt Study settlement buffer.</p> <p>The site is approximately; 1.1 kilometres from a primary school, 90 metres from a secondary school, 50 metres from a bus stop, 2.6 kilometres from Harpenden mainline railway station and 750 metres from a Local Centre.</p> <p>A small section of the site is in flood zone 2, 3, 3a, 3a + 35% climate change and 3a + 70% climate change. A Strategic Flood Risk Assessment Level 2 was undertaken for this site.</p> <p>The whole site is within a landscape conservation area. The site is within the 100 metres buffer of a Thatched Cottage Grade II listed building and a coastal and floodplain grazing marsh Priority Habitat. The site contains some hedgerows and individual mature trees.</p>

A telecommunication site is to the north west of the site. A waste site allocation and water pumping station are just west of the site.

Potential access is via Lower Luton Road.

This site is recommended to progress.

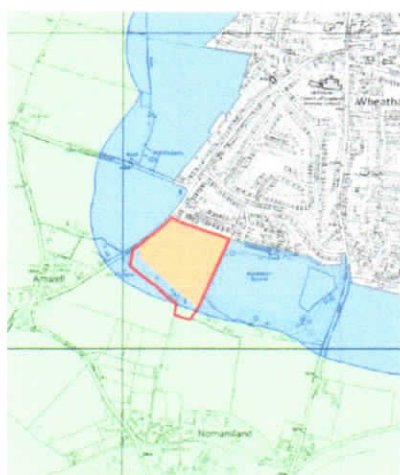


### Local Plan Site Selection Proforma Sheet

Site Ref	HELAA Ref	Green Belt Sub-Area Ref	Site Address	Parish	Area in Ha	Current Land Use	Proposed Use
C-280	WH-24-17	SA-53 / RA-30	Amwell Top Field, Wheathampstead, AL4 8DZ	Wheathampstead	5.65	Agricultural	Primarily residential

### Location of Site

Green Belt Settlement Buffer Map



#### Legend

- Local Authority Boundary
- HELAA Site Boundary
- Urban Settlement
- Metropolitan Green Belt
- Green Belt Study Recommended Area
- Green Belt Study Settlement Buffer (250m)
- Green Belt Study Settlement Buffer (400m)

Constraints Site Map



- Flood Zone 2
- Flood Zone 3
- Flood Zone 3b
- Conservation Areas
- Listed Buildings
- Grade I
- Grade II
- Grade II\*
- Locally Listed Buildings
- Scheduled Ancient Monuments
- Metropolitan Green Belt
- Ancient Woodlands
- Registered Parks and Gardens
- Local Nature Reserves
- Site of Special Scientific Interest

Aerial of Site



© Bluesky International Ltd. / Getmapping PLC

### Description of Site

The site is located to the south west of Wheathampstead. Amwell Lane is to the north west of the site, with woodland and open fields beyond. To the north east are residential dwellings along High Ash Road and a playing field lies to the east. To the south and south west are open fields and woodland.

### This site was assessed in terms of its sustainable development potential

Location	Yes, Partially or No
Located within Green Belt Buffer or settlement area	Yes – 97%
Located on previously developed land	No – 0%
Located within Green Belt Study weakly performing area	No
Located within Green Belt Study less important area	Partially – 77%
Located within Green Belt Study Recommended for further Consideration area	Partially – 77%

### Major Policy and Environmental Constraints

Functional Floodplain (or climate change floodplain)	S
Heritage Asset or its setting	M
Ancient Woodland	S
<b>Accessibility</b>	
Distance to nearest bus stop (with at least peak hourly service)	M
Distance to nearest mainline railway station	W

Distance to nearest branch line railway station	W
Distance to the nearest employment site/location	S
Distance to the strategic road network for employment sites	N/A
Distance to local centre/town centre/village centre	M
Distance to nearest infant/primary school	S
Distance to nearest secondary school	W
Distance to nearest GP surgery	M
<b>Other Key Constraints</b>	
Agricultural Land Classification	W
Nationally (European) Protected Sites (SSSI)	S
Local or Regional Nature Conservation sites	M
Priority Habitats (listed on S.41 of the NERC Act)	M
Existing Woodland	W
Archaeological Assets including their setting	M
Landscape Conservation Areas including their setting	W
Source Protection Zones	M
Access to Open Space	S
Air Quality	S
Utilities and Infrastructure	W
Tree Preservation Order (TPO) trees	S
Areas of non-designated biodiversity	M
Green Infrastructure Corridors	W
Access to the Site	M
Contamination	S
Mineral Resource	S
Waste	S
Chiltern Beechwoods SAC Zone of Influence	S
Buncefield Protection Zone	S

CRITERION BASED ASSESSMENT TOTAL	8 - Weak	10 - Medium	13 - Strong
----------------------------------	----------	-------------	-------------

Qualitative Assessment
<p>Part of the site is recommended for further consideration by the Green Belt Stage 2 Report.</p> <p>The site is adjacent to Wheathampstead, a Tier 4 Settlement in the Settlement Hierarchy. Most of the site is within the Green Belt. It is mostly within the 250 metres Green Belt Study settlement buffer.</p> <p>The site is approximately; 750 metres from a primary school, 3.8 kilometres from a secondary school, 910 metres from a bus stop, 5 kilometres from Harpenden mainline railway station and 920 metres from a Local Centre.</p> <p>The whole site is within a landscape conservation area, and it is adjacent to Wheathampstead conservation area. It is also adjacent to an archaeological area subject to recording conditions.</p> <p>It is adjacent to a County Wildlife Site, which is also classified as a Local Nature Reserve site and a deciduous woodland Priority Habitat. The site contains an area of undesignated woodland, is adjacent to mature trees and other areas of undesignated woodland.</p> <p>A gas pipeline runs through the centre of the site from north-west to south-east.</p> <p>Potential access is via Amwell Lane or through to High Ash Road.</p> <p>This site is recommended to progress.</p>