



- Site Boundary - 43.58 ha
- 1 Access from A414 to Employment & MRT development with improved pedestrian crossing
- 2 Access to residential development
- 2 Pedestrian Access to employment, MRT & Country Park
- Public Right of Way
- National Cycle Route
- Proposed Pedestrian Connections
- Residential - 1.02 ha
- Amenity Open Space - 5.66 ha
- Country Park - 33.19 ha
- Employment - 3.70 ha
- Mass Rapid Transit (MRT) Interchange
- Indicative attenuation features
- Indicative Woodland and Tree Planting
- Indicative Local Equipped Area of Play (LAP)

05 March 2021  
**Delivered by email**

CH10

Mrs Tracey Harvey  
Head of Planning and Building Control  
St Albans City and District Council  
Civic Centre  
St Peters Street  
St Albans  
AL1 3JE

Ref: TARC3000

Dear Mrs Harvey

**ST ALBAN'S DRAFT LOCAL PLAN 2020-2038: CALL FOR POTENTIAL DEVELOPMENT SITES 2021  
SITE SUBMISSIONS ON BEHALF OF TARMAC.**

We are instructed by our clients: Tarmac, to submit various site submissions in connection with the above consultation, in respect of the following four promoted development sites in St Albans District, all of which, are within the freehold ownership of Tarmac.

The four promoted sites contained within these call for sites submissions are:

- **Land South of London Colney**
- **Land at Colney Heath**
- **Land at Moor Mill North**
- **Land at Tyttenhanger**

Tarmac is an established land promotion and development company with a significant portfolio of freehold and other commercial land interests in St Albans District. Tarmac is also a major national employer with nationwide experience of bringing forward strategic development sites of all scales for new residential, mixed-use and commercial and industrial development.

Tarmac is promoting four of its numerous freehold sites in the south of the St Albans District in the A414 and M25 corridors for potential residential, employment and other related development, including new transport infrastructure and contributions to the public realm. Turley has been instructed to prepare four separate site submissions in relation to each of these promoted site locations which are attached to this correspondence. The main attributes of the four promoted Tarmac sites are set out in the following overarching summary:

Our complete submissions comprise this overarching summary and four individual written site evaluations. Each site evaluation also has three related drawing Appendices (a red line plan, a constraints plan and a Framework Masterplan). Our overall site submissions on behalf of Tarmac comprises 17 items in total.

8 Quay Court  
Colliers Lane  
Stow-cum-Quay  
Cambridge  
CB25 9AU

T 01223 810990 [turley.co.uk](http://turley.co.uk)

## Land South of London Colney

This promoted site, comprises 32.75 hectares of previously used land located to the south of London Colney immediately to the north of the M25 and south of the River Colne, as shown on the red line plan at **Appendix 1** of the attached South London Colney site evaluation.

The Framework Masterplan proposals set out at **Appendix 3** of the South London Colney site evaluation illustrate a viable scheme for circa 750 new market and affordable homes, set over 18.79 hectares, a new two-form entry Primary School, located on a 2.25 hectare site and a new Local Centre occupying 0.30 hectares. The broad concept of the proposal is to provide a new Garden Suburb to South London Colney in the area between the existing Colney Fields Retail Park and Shenley Lane, with the area to the south bounded by the M25. A further 11.41 hectares (35%) of the site will comprise formal public open space, children's play provision, semi-natural green spaces, incidental open green areas and structural landscaping. Vehicular access to the site will be via Shenley Lane to the west (B5378) with further pedestrian and cycle connections to London Colney High Street.

The development proposed on this site is in a highly sustainable, well connected and self-contained, location. The promoted site lies adjacent to major existing retail facilities and close to the historic village core. The Site also lies within a strategic Sub-Area previously identified in the 2014 St Albans Green Belt Review as one of the Sub-Areas contributing least to the purposes of the Green Belt. Therefore this site serves little or no existing Green Belt function and can make a strong sustainable contribution to future housing land supply in St Albans District. As such, the site is highly suitable for detailed consideration for sustainable new development.

The South London Colney site has been previously worked for minerals and landfilled and so consequently has little in the way of existing landscape character. In addition, two of its boundaries are set in an urban context as the site is located directly adjacent to existing major retail facilities and close to national transport infrastructure. South London Colney can therefore be brought forward in the new Local Plan as a residential site to create a cohesively located, sustainable new Garden Suburb, to which it is well suited. The development of the South London Colney site for mixed-use purposes would also be a more efficient and sustainable use of land in this urban fringe location. This development of this previously used site could also help to reduce development pressures on other, more functional and visually sensitive areas, of the Green Belt, within St Albans District.

A comprehensive Vision Document is currently in preparation for this site, in lieu of the consultation stages of the emerging Draft Local Plan, which will provide additional technical details.

## Land at Colney Heath

The promoted site at Colney Heath comprises 43.58 hectares of open grassland, local woodland and a lake adjacent to the southwest boundary, located to the south east of the A414, between the villages of Colney Heath and Sleafshyde, as shown on the red line plan at **Appendix 1** of the Colney Heath site evaluation.

The hybrid development proposals at Colney Heath, are primarily intended to serve as a new Country Park, which would occupy circa 89% of the total site area. The residual 11% of the Colney Heath site is proposed to accommodate employment and a small scale residential use together with new public transport infrastructure provided in the form of an MRT interchange, to deliver sustainable growth within the A414 corridor on the most unconstrained areas of the site.

8 Quay Court  
Colliers Lane  
Stow-cum-Quy  
Cambridge  
CB25 9AU

T 01223 810990 [turley.co.uk](http://turley.co.uk)

The Framework Masterplan proposals set out at **Appendix 3** of the Colney Heath site evaluation illustrate a viable scheme for an employment-led, hybrid development, comprising 3.70 hectares of employment land, approximately 30 new homes adjoining the existing village envelope on a small, one hectare, site and a transport interchange connected to the A414 and a new 33 ha Country Park. The Framework Masterplan also proposes a further 5.66 hectares of formal and informal public open space associated with the new built development.

The Tarmac proposals at Colney Heath meet the core objectives of the NPPF in that there is an opportunity to establish a diverse, high quality, County Park for the long term benefit of all residents of St Albans District, facilitating the release of a further area of Tarmac land for employment, residential and transport infrastructure purposes, in accordance with a sustainable pattern of development. The scale of the residential component is also in accordance with the 10% target set by Paragraph 68(a) of the NPPF.

## Land at Moor Mill North

The promoted site at Moor Mill North comprises 12.26 hectares of open grassland with local woodland located in the western area of the site, adjacent to the River Ver, which forms the western boundary. The site is located on the western edge of Frogmore Village and adjoins the extensive rear gardens of the residential properties which front Radlett Road, as shown on the red line plan at **Appendix 1** of the Moor Mill North site evaluation.

The Framework Masterplan proposals set out at **Appendix 3** of the site evaluation illustrate a viable scheme for a landscape-led, residential development of approximately 5.88 hectares, comprising up to 180 new market and affordable homes. The Framework Masterplan proposes a further 6.38 hectares of natural greenspace in the form of a new Community Woodland and public open space associated with the new residential development.

One of the main considerations in the Framework Masterplan is to provide an integrated and sympathetic extension to the existing village envelope, which will provide new homes and assist with community cohesion. As such, the site is promoted as a small garden village suburb of Frogmore, with a strong semi-rural character. This is reflected in the proposed low ratio of built form to useable natural greenspace.

This promoted site forms part of a much larger Tarmac land holding at Moor Mill. The wider Tarmac owned land parcel in question at Moor Mill North is roughly triangular in form and is enclosed by the settlement boundary of Frogmore to the east, the How Wood Railway Line to the west and the M25 corridor to the south. The overall scale of the Tarmac land holding in this area is circa 90+ hectares. In this regard, the built form of the proposed development at Frogmore equates to no more than 5.88 hectares. This therefore represents less than 7% of the overall site area within Tarmac's total land ownership at Moor Mill North.

## Land at Tyttenhanger

The promoted site at Tyttenhanger comprises two separate land parcels, which are bisected by a shared private access road. The north eastern land parcel is 18.07 ha in area and this comprises an active Tarmac operational unit (Tyttenhanger) with associated buildings. The land parcel to the south west is 13.07 ha in area and is broadly triangular in shape. This adjacent site has also been previously used for mineral extraction and has been restored to open pasture fronting the A414, which forms the northern boundary. The latter site is immediately available as a development opportunity now, save for an initial period for site preparation, given its historic use.

8 Quay Court  
Colliers Lane  
Stow-cum-Quay  
Cambridge  
CB25 9AU

T 01223 810990 [turley.co.uk](http://turley.co.uk)

The remaining two boundaries comprise the access road to the north east and a wooded tree belt to the south, which separates this parcel from a nature reserve further south (Willows Lakes). The northern apex of the lower site adjoins a petrol filling station which fronts the A414 and which has a local waste management operator located behind the petrol station premises within the same general curtilage. The overall combined site is circa 31.14 ha in area and is promoted for a broad range of uses, comprising employment, commercial, leisure and residential. However given the current operational activity on the upper site, the timing of when each parcel can come forward will be at different points in the plan period.

As such, the upper site is not being promoted at this time for general residential use, although Tarmac reserve judgement on this position in the medium term, given that a large new settlement is also being promoted in close proximity to Tarmac's promoted site on other neighbouring land in Tyttenhanger, in Hertsmere District. This authority is currently in the process of finalising their Draft Local Plan for examination.

The Framework Masterplan proposals set out at **Appendix 3** of the site evaluation illustrate a viable scheme for an employment-led, hybrid development, comprising 4.66 ha of employment land in the upper site parcel and 7.33 ha of developable land, for a broader range of uses, in the lower site parcel. The lower site parcel is also suitable for potential residential use, as a large new settlement is being actively promoted in Hertsmere District, on an adjacent site in Tyttenhanger, which presents key opportunities under the Duty to Cooperate.

Given its A414 frontage location, the Tarmac site at Tyttenhanger has the potential to host an MRT stopping point and a new transport interchange, which could be of mutual benefit to the Tarmac site proposal and the adjoining potential new settlement. The remaining undeveloped 60% of the Tarmac site at Tyttenhanger would also help to offset the built form of the development by improving the environmental quality, accessibility and biodiversity of the site. The proposals are therefore in accordance with the aims and objectives of the NPPF.

In conclusion, the attached four site submissions and their appendices identify four sustainable Tarmac owned sites for development and set out a summary case for their future allocation for the range of uses described. With regard to the largest of these proposals, at South London Colney, these submissions are made in lieu of additional forthcoming technical submissions, which will be set out in a Vision Document in production.

Further technical details of the other promoted Tarmac sites will also follow these site submissions in lieu of future Local Plan consultations. However in the interim, should St Albans Council require any additional information on any specific site, Tarmac and its consultant team will be able to address any technical queries on request and welcome the opportunity to further engage with the Council.

Yours sincerely

[Redacted signature]

[Redacted name]

**Director**

**On behalf of Tarmac**

[Redacted name]

Enc.

8 Quay Court  
Colliers Lane  
Stow-cum-Quy  
Cambridge  
CB25 9AU

T 01223 810990 [turley.co.uk](http://turley.co.uk)

# Land at Colney Heath

Submissions on behalf of Tarmac

St Albans City and District

Local Plan 2020 - 2038

Call for Sites Consultation

January 2021

**Turley**

# Contents

- 
1. Introduction
- 
2. Site Evaluation – Land at Colney Heath
- 

## Appendices

- Appendix 1** Red Line Site Plan
- Appendix 2** Site Constraints Plan
- Appendix 3** Illustrative Framework Masterplan



Steven Kosky BA (Hons) DipTP MRTPI  
steven.kosky@turley.co.uk

**Client**  
Tarmac

**Our reference**  
TARC 3000

05 March 2021

## 1.0 INTRODUCTION

- 1.1 These site submissions have been prepared by Turley, on behalf of Tarmac, pursuant to the St Albans City and District Local Plan 2020-2038, call for potential development sites consultation, January 2021. Tarmac is an established land promotion and development company with a significant portfolio of freehold and other commercial land interests in St Albans District. Tarmac is also a major national employer with nationwide experience of bringing forward strategic development sites of all scales for new residential, mixed-use and commercial and industrial development.
- 1.2 Tarmac is promoting four of its freehold sites in the south of the St Albans District in the A414 and M25 corridors for potential residential, employment and other development. Turley has been instructed to prepare separate site submissions in relation to each of these promoted site locations and the inter-relationships and connectivity between these four Tarmac sites is set out in our overarching correspondence. The following site-specific submissions relate to Tarmac's **Land at Colney Heath**, which is located southeast of the A414, between the villages of Colney Heath and Sleafshyde, as shown on the attached red line plan at **Appendix 1**.
- 1.3 Hertfordshire County Council (HCC) adopted their strategy in 2019 to upgrade the A414, into a principal multi-modal movement corridor linking the main urban centres within the County, to support growth within the County in a more efficient and sustainable manner.
- 1.4 These improvements include the development of Mass Rapid Transport (MRT) cycleways and other targeted capacity and safety improvements. Transit Oriented Development (TOD), whereby development is located at key nodes (communities) within the corridor with high quality interchange opportunities, will also complement this aligning of planned land use with the transport strategy.
- 1.5 The promoted site at Colney Heath comprises 43.58 hectares of open grassland, local woodland and a lake adjacent to the southwest boundary. The site is promoted as a hybrid proposal with the potential to provide a mixed-use development opportunity comprising 3.70 hectares of new B1 employment fronting the A414 (innovation hub or similar) and up to 30 new homes directly adjacent to Colney Heath village on a 1 hectare parcel.
- 1.6 The majority of the remainder of the Site (circa 33 ha) is proposed as compensatory Green Belt land, in the form of a new Country Park. The employment land and the County Park are also both proposed with a direct connection to and transport interchange with the A414 corridor including the Mass Rapid Transport (MRT).
- 1.7 Access work will allow existing safety issues on the A414 to be addressed whilst also making strong connectivity for pedestrians and cyclists on a north - south axis (addressing existing severance). The proposals provide for supporting infrastructure on Site.
- 1.8 An illustrative Framework Masterplan is attached at **Appendix 3** for reference.



- 1.9 The following site evaluation describes the rationale behind the Framework Masterplan and assesses the proposals against the evaluation criteria used by St Albans during the last call for sites exercise, held in 2018.
- 1.10 The evaluation sets out the availability, suitability and deliverability of the proposals and their compatibility with this local methodology, the 2019 NPPF and the Draft Local Plan Inspector's Report 2020.
- 1.11 This evaluation concludes with a summary case as to why exceptional circumstances exist to justify the release of **Land at Colney Heath** by St Albans City and District Council for an employment-led, hybrid development, comprising 3.70 hectares of employment land, approximately 30 new homes, a transport interchange and a new 33 ha Country Park.

## 2.0 SITE EVALUATION: LAND AT COLNEY HEATH

### Location and Site Characteristics

- 2.1 The promoted site at Colney Heath comprises 43.58 hectares of open grassland, local woodland and a lake adjacent to the southwest boundary, located southeast of the A414, between the villages of Colney Heath and Sleafshyde, as shown on the attached red line plan at **Appendix 1**.
- 2.2 The north-western boundary is linear in form and follows the south-eastern side of the A414, to the immediate south-east of Sleafshyde village. The north-eastern boundary is dog-legged and framed by the edge of adjacent woodland. The south-eastern boundary of the site adjoins arable farmland and comprises a mix of open grassland and the edges of woodland blocks located further within the site. This south-eastern boundary and the linear north-western boundary are both proposed for significant landscape consolidation as shown on the illustrative Framework Masterplan (**Appendix 3**).
- 2.3 The south-western boundary comprises the edge of a meandering woodland block which adjoins the northern settlement boundary of Colney Heath at its western end and wraps around the playing fields of Colney Heath Football Club further east. The remainder of this boundary is formed by the access road, which links the site and the Football Club to the village High Street in Colney Heath.
- 2.4 The site is well connected to both Colney Heath and Sleafshyde via the existing footpaths which traverse the site and the existing access road which links to the village High Street. The existing A414 crossing provision for pedestrians and cyclists is poor but will be upgraded. This will be focused on the proposed transport interchange that will include shared car and cycle parking to maximise access to MRT services to the wider hinterland.
- 2.5 The proposed employment uses and the interchange would be directly accessed from the A414, via a new point of access at the existing Sleafshyde junction on the A414 as shown on the Framework Masterplan. The existing junction has a conventional geometry and a poor accident record. In forming the access the geometry will be amended to reflect current best practice in terms of road safety and incorporate provision for pedestrians and cyclists. Access to the proposed small residential area adjoining the existing settlement envelope to the southeast of Colney Heath would be via the existing access road shared by the Football Club. Visitors to the new County Park would be encouraged to use the new transport interchange.

### Site Constraints

- 2.6 Pursuant to these site submissions, Tarmac commissioned Turley to identify the relevant constraints to residential and other proposed development on the Site to inform the illustrative Framework Plan (see the constraints plan at **Appendix 2**). The site has some identified constraints and we summarise these below and how the Concept Framework has responded in terms of presenting an achievable and deliverable illustrative scheme.

- 2.7 The primary constraint on the site is lakeland area and the floodplain associated with the connected watercourse which runs through the length of the site, as shown on the constraints plan. This is not a constraint to the open recreational use proposed, but it is a constraint to any built development in the Flood Zone 3 areas shown on the plan.
- 2.8 Similarly, the woodland areas shown on the constraints plan are also unsuitable for any built development, but the combination of these mature woodland areas and existing watercourses, set in the context of the inter-connecting open grassland, create an ideal dynamic for the recreational Country Park use proposed in these areas of the site as part of an overall hybrid development proposal. Other than these identified water courses and the woodland areas shown there are no other known site constraints.

### The Illustrative Framework Masterplan

- 2.9 The Framework Masterplan proposals set out at **Appendix 3** illustrate a viable scheme for an employment-led, hybrid development, comprising 3.70 hectares of employment land, approximately 30 new homes adjoining the existing village envelope, a transport interchange connected to the A414 and a new 33 ha Country Park. The Framework Masterplan also proposes a further 5.66 hectares of formal and informal public open space associated with the new built development.
- 2.10 One of the primary considerations in the Framework Masterplan is to provide a new high quality Country Park. Further considerations relate to the fact that this site also offers an excellent location for new high end employment uses fronting the A414 in the Colney Heath / Sleapshyde area on the unconstrained road frontage area of the site. These new employment uses would be located on an existing bus route and less than 1 mile from South Hatfield and the University of Hertfordshire campus. They would also provide a distinct node on the proposed MRT system, allowing the villages of Sleapshyde and Colney Heath to be readily connected to this strategic future transport infrastructure.
- 2.11 A small rectilinear land parcel, at the south-western end of the site, of circa 1 hectare directly adjoins the existing village envelope. This land is unconstrained and is cohesively located in terms of its relationship with the existing pattern of settlement in the village. This land is therefore well suited for a small village expansion area for approximately 30 new homes and is proposed for this purpose as part of the hybrid approach to the site. Other aspects of the Framework Masterplan include the landscape consolidation of the north-western and south-eastern boundaries as shown, to help mitigate road noise from the A414 and enhance the amenity and enclosure of the new Country Park. The proposed overall land budget for the illustrative scheme at **Appendix 3** is as follows:

<b>Colney Heath: Land Budget</b>	
Red Line Site Area	<b>43.58 ha</b>
New Employment Land	3.70 ha
New Residential Area	1.02 ha
Open Space associated with New Development	5.66 ha
New Country Park	33.20 ha

### Green Belt Function in this Site Location

- 2.12 The **Green Belt Review Purposes Assessment: November 2013** (Green Belt Study) is the extant Green Belt evidence base currently available to the Council, relative to this site. In this regard, the site at Colney Heath lies within the assessed Green Belt Parcel **GB34**.
- 2.13 The assessed Green Belt Parcel is some 419 ha in total area, therefore the site promoted by Tarmac for the hybrid development proposed, equates to around 10% of the overall area, assessed by the Green Belt Study. However, given that the built form proposed on the Tarmac site represents only 11% of the total promoted site area (4.72 ha) and that 89% of the site (38.86 ha) is being promoted either as a Country Park or public open space, the context is that the total built form proposed by Tarmac on this site equates to only **1%** of Green Belt Parcel **GB34**.
- 2.14 The principal function of Parcel GB34 was assessed as making a significant contribution towards safeguarding the countryside and maintaining the existing settlement pattern, by providing a gap between Hatfield and London Colney. The Parcel was also assessed as making a partial contribution towards preventing the merging of St Albans and Hatfield and preserving the setting of London Colney, Sleafshyde and Tyttenhanger. Parcel GB34 was considered to contribute significantly towards 2 of the 5 Green Belt purposes.
- 2.15 The assessment noted that in combination, Parcel GB34 contributed towards maintaining the strategic gap between St Albans and Hatfield. The assessment noted that as a whole, that the gap contains some built development associated with 3rd tier settlements in the Green Belt. However, any minor reduction in the gap would be unlikely to compromise the separation of 1st tier settlements in physical terms, or overall visual openness.
- 2.16 The gap south to Colney Heath was noted as relatively free of development, however the gap to the north is more built up and narrower. Therefore any reduction in the gap to the north was judged to compromise the separation of settlements in physical and visual terms and local levels of visual openness. In contrast, any minor reduction to the south was judged to be a less significant assessed impact. Parcel GB34 also adjoins the London Colney and Sleafshyde Conservation Areas, however the assessment noted that visual connection or views to these areas are limited by local routes and wooded areas.
- 2.17 Accordingly in terms of assessing the five purposes of Green Belt, as set out in Paragraph 134 of the National Planning Policy Framework (NPPF) the evaluation of the promoted Tarmac site at Colney Heath can be broadly summarised as follows:

#### **a) To check unrestricted sprawl of large built up areas**

- 2.18 The Tarmac proposal is for a landscape-led hybrid development with high standards of design, landscaping and social integration with the existing settlements of Colney Heath and Sleafshyde, including the provision of new community infrastructure. These two settlements are compact in scale and as such, do not represent a large built up area as they are permanently separated from each other by the A414 corridor.

- 2.19 The release of the promoted site for use as a Country Park use and other complementary employment generating uses, as set out in these submissions, would therefore maintain the existing settlement identity of both locations. The proposals would also be subject to full public consultation and examination and brought forward via the Plan-led system and so would not represent any unrestricted sprawl in this area.

**b) To prevent neighbouring towns merging into one another**

- 2.20 The nearest affected settlements are Colney Heath and Sleafshyde which could not be physically coalesced by the partial development of the promoted site, by reason of the permanent severance caused by the A414. The dominant proposed use of the Tarmac site is for a new County Park, with the primary built form comprising a new employment area aligned alongside the A414.
- 2.21 The location within the site for the new employment use is particularly well contained by the A414 to the northwest and by dense woodland to the southeast of the proposed employment curtilage. As such, the built element of the proposed hybrid use would be visually contained within the boundaries shown on the Masterplan and would not be prejudicial to this Green Belt purpose.

**c) To safeguard the countryside from encroachment**

- 2.22 The Tarmac site is partly open in character, interspersed with pockets of woodland and lakes and displays a pastoral appearance, which will be largely maintained and enhanced as 89% of the site will be retained as formal, semi-natural and natural public greenspace. The areas proposed for built development on the site are visually self-contained and are adjacent to established and defensible boundaries. Therefore the partial development of the identified sections of this site would not represent any visual encroachment into the open countryside in this particular location.

**d) To preserve the setting and character of historic towns**

- 2.23 The promoted site at Colney heath is not proximate to any historic towns, being located some distance away from the nearest town at St Albans. The site is proximate to the Sleafshyde Conservation Area to the north, however any potential impacts are primarily mitigated by the physical separation of the intervening A414 corridor. Accordingly any residual impacts can be managed through the detailed design process, as illustrated in principle by the Framework Masterplan.

**e) To assist in urban regeneration**

- 2.24 The planned release of this site for sustainable development would not be prejudicial to the delivery of urban regeneration elsewhere in the District. The combination of the scale of the housing and employment requirement, the limited urban capacity for brownfield redevelopment and the predominance of Green Belt throughout the District, means that the planned release of Green Belt will be a necessary key element of the spatial strategy of the new Local Plan.

### Availability, Suitability and Deliverability

- 2.25 The promoted site comprises 43.58 hectares and is within the sole freehold ownership of Tarmac. The site is available now for the hybrid uses outlined above, as illustrated in the Framework Masterplan and requires no advance remediation. The site can therefore be brought forward upon the adoption of the new Local Plan or can be safeguarded for future development and brought forward later within the new plan period as required.
- 2.26 The site is suitable for the uses proposed as it lies within a strategic transport corridor which is already served by public transport. This is likely to be enhanced in the future with the implementation of the proposed MRT system and the proposals are designed to accommodate an MRT interchange on site. The ratio of built development proposed on the site equates to under 11% of the total site area (4.72 ha) with the remaining 89% (38.86 ha) comprising the new Country Park, which will be accessible by non-car modes and the new public open space associated with the developed areas of the site.
- 2.27 There are no known significant constraints to the immediate development of this site for the proposed employment and residential uses as shown. Where constraints exist, such as the identified floodplain areas, these are compatible with the open recreational uses proposed in those locations. The development of the site for the other uses proposed would also provide the opportunity to deliver a proportionate scale of new market and affordable homes to Colney Heath, whilst also improving the sustainability of the area by providing high quality, local employment facilities, accessible by public transport.

### Consistency with National Policy

- 2.28 The NPPF states at Paragraph 67 that that planning policies should identify a sufficient supply and mix of sites, taking into account availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) specific, deliverable sites for years one to five of the plan period; and*
  - b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*
- 2.29 In this regard, the promoted site at Colney Heath is available immediately and is suitable for the hybrid development proposed without the need for any forward infrastructure. The viability of the overall proposed development, including the employment land has been tested by Tarmac and the scheme is viable. The site is therefore suitable for delivery during years 1-5 of the new Local Plan period for both the residential and employment land components.
- 2.30 Paragraph 68 of the NPPF identifies that Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Therefore to promote the development of a good mix of sites local planning authorities, inter alia, should:

*a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*

- 2.31 In this regard, the residential component of the hybrid development proposed at Colney Heath equates to broadly 1 hectare and so fits this NPPF requirement exactly. As such, the allocation of this part of the site would assist St Albans Council in meeting the 10% target required under Paragraph 68 of the NPPF.

### **Consistency with the Local Plan Examination Inspector’s Recommendations**

- 2.32 On 14<sup>th</sup> April 2020 the Inspectors appointed to examine the former Draft Local Plan wrote to St Albans Council to clarify a number of issues. Amongst some of the suggestions made by the Inspectors in their letter was that a range of smaller sites should be considered as part of the spatial strategy going forward.

- 2.33 In this regard the Inspectors stated, inter alia, at Paragraph 43 of their letter:

*‘We see no reason why the identification of some smaller sites would unacceptably spread the adverse impacts of development on Green Belt purposes. Whilst this would extend the impact of development over a wider geographic area, the extent of the resultant impacts would be likely to be smaller given the more limited scale of the sites....’*

- 2.34 These recommendations are consistent with Paragraph 68 of the NPPF and were agreed in principle by St Albans Council in following correspondence. Accordingly the residential component of the promoted site at Colney Heath additionally fits this small site criteria.

### **Conclusions and the Exceptional Circumstances Case**

- 2.35 The NPPF does not provide decision makers with a strict definition with regards to what constitutes ‘exceptional circumstances’. However Paragraph 137 of the NPPF sets out a number of matters that should be identified and dealt with in order to ascertain whether ‘exceptional circumstances’ exist to justify releasing land from the Green Belt.
- 2.36 The approach taken in the ‘Calverton’ judgement (*Calverton Parish Council v Greater Nottingham Councils - 2015*) also provides useful guidance when considering whether exceptional circumstances exist. These include; the intensity of the assessed need, inherent constraints on the supply of land suitable for sustainable development and difficulties in achieving sustainable development without impinging on the Green Belt.
- 2.37 The intensity of the assessed housing need in the District was highlighted at the recent 2020 Local Plan examination and has materially increased by reason of the requirement for the new replacement Local Plan to adopt the Government’s standard methodology.

- 2.38 The hybrid development proposals at Colney Heath, as set out in these site submissions, are mainly intended to provide a new Country Park, which would occupy approximately 89% of the total site area. The residual area of the site is also proposed for a combination of employment and small scale residential uses, together with new public transport infrastructure to deliver sustainable development within the A414 corridor, on the most unconstrained areas of the site.
- 2.39 The proposals are complementary to the emerging HCC A414 strategy as they provide the opportunity to create an interchange with MRT services and enhanced pedestrian and cycle crossing on the A414 to help further link the villages of Colney Heath and Sleafshyde to St Albans and Hatfield by sustainable transport means. These neighbouring villages would also benefit from the availability of new, high quality, local employment and leisure facilities in close proximity to these settlements, thereby reducing the need to travel.
- 2.40 Paragraph 138 of the NPPF states that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.
- 2.41 Paragraph 138 further states that where it has been concluded that it is necessary to release Green Belt for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The hybrid Tarmac proposals at Colney Heath meet the above objectives of the NPPF in that there is an opportunity to establish a diverse and functional County Park for the long term benefit of all residents of St Albans District, in conjunction with other mixed-use sustainable development.
- 2.42 The residual area of the Colney Heath site (4.72 ha) is highly suitable for B1 employment uses fronting the A414 corridor, as proposed at Appendix 3, in combination with a new transport interchange. In addition, a small sub area of the site to the south of the site could provide a very sustainable, discreet village extension to Colney Heath, which would be delivered quickly in accordance with the 10% target set by Paragraph 68 of the NPPF and contribute early to the Council's five year housing land supply.
- 2.43 In conclusion, the proceeding submissions identify a suitable site for sustainable mixed-use, development at Colney Heath and set out a summary case for its future allocation. Where St Albans Council requires any additional information, Tarmac and its consultant team are able to address any technical queries on request and welcome the opportunity to engage further with the Council.



**Appendix 1**  
**Land at Colney Heath**  
**Site Location / Ownership Plan**

**Appendix 2**  
**Land at Colney Heath**  
**Site Constraints Plan**

**Appendix 3**  
**Land at Colney Heath**  
**Illustrative Framework Masterplan**

