


NOTES

- Contractors must check all dimensions on site. Only figured dimensions are to be worked from. Discrepancies must be reported to the Architect or Engineer before proceeding.
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Key:

-  Existing Trees & RPAs
-  Existing Listed Building
-  Denotes Existing PROW
-  Denotes Existing walked route
-  Denotes Existing Drainage
-  Denotes Existing HV Cable
-  Proposed Landscape Buffer
-  Proposed Trees
-  Proposed Green Space
-  Denotes Proposed Site Access
-  Potential Play Space
-  Proposed Location of New Pump Station
-  Denotes Proposed Attenuation
-  Denotes Key/Focal Buildings
-  Denotes New Footpath Route

REV/DESCRIPTION	DRAWN	CHK	DATE
<input checked="" type="checkbox"/> PRELIMINARY	<input type="checkbox"/> INFORMATION	<input type="checkbox"/> TENDER	
<input type="checkbox"/> CONSTRUCTION	<input type="checkbox"/> AS BUILT		

SCALE 1:1000 @ A2 DATE July 2020

DRAWN AJS CHK TF

DRAWING NO. 17981/1005 REV -

TITLE
Land West of Bullens Green Lane
Colney Heath

DETAILS
Proposed Illustrative Layout



Woods Hardwick

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS DRAWING

25 January to 5pm 8 March 2021
'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

Please do not submit sites that:

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

By online consultation portal:

<http://stalbans-consult.limehouse.co.uk/portal/>

By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

Your Details	
Name	Nigel Ozier
Company/Organisation	Aitchison Raffety Planning Division
Address	The Granary, Spring Hill, Harborough Road, Pitsford, Northampton,
Postcode	NN6 9AA
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details					
Requirements:					
<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 					
Site address/location (Please provide a map showing the site boundary)	Land rear of 113-167 Colney Heath Lane/south of Alban Park retail area				
Site area (in hectares)	20ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table>	Easting		Northing	
Easting		Northing			
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	<div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 2px;"></div> <div style="background-color: black; width: 60%; height: 1.2em;"></div>				
Current land use	Open land				
Condition of current use (e.g. vacant, derelict)	vacant				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	Provides the opportunity for 300 affordable houses and to meet the needs for housing in the District and to make up significant shortfall in respect of these homes				

Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years
---	--

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Preservation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Topography affecting site (land levels, slopes, ground conditions)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input checked="" type="checkbox"/> Pre-Application Advice <input checked="" type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history) <div style="background-color: black; height: 15px; width: 100%;"></div>	
Other comments		



**TOWN AND COUNTRY
PLANNING ACT 1990**

ST ALBANS LOCAL PLAN

**Call for Potential
Development Sites**

**Development of
Affordable Housing on
Land south of Alban Way/rear
of 113-167 Colney Heath Lane
St Albans**

March 2021

**Supporting Statement
on behalf of
Ms Julie Bennett, Ms Alison
Crafts and Mr Gerard O'Sullivan
(working with Settle Group)**

**Prepared by
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BA (Hons) MRTPI**

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CHARTERED TOWN PLANNING CONSULTANTS

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1. INTRODUCTION

- 1.1 This Statement has been prepared to support the inclusion in the call for sites of land south of Alban Way and to the rear of 113 to 167 Colney Heath Lane, St Albans for residential development, providing some 300 affordable dwellings,
- 1.2 While some discussions have taken place to support the development of the site, these have proved difficult due to the withdrawal of the new Local Plan and the current vacuum in planning policy. However, in support of the development of the site, a pre-application consultation has commenced and an initial response received and discussed with the officer. It is intended to continue these discussions and to respond on a number of areas in support of the pre-application consideration.
- 1.3 A number of representations have been made at the previous stages of the former emerging Local Plan to support the residential development of the above site on behalf of London Colney Limited. These representations have been extensive and in the submission in October 2018, it was considered that the Local Plan was unsound, highlighting the development strategy set out in the Local Plan and the assessment of Green Belt land to be released. These issues, together with a number of others, are indeed central to the recent Inspectors' comments on the new Local Plan following the postponement of the Local Plan Examination.
- 1.4 It is important in terms of this call for sites that since these representations were made, there has been a change in the proposals for the site. It is now proposed that the site is developed wholly for affordable housing, meeting a need which historically has not been met through recent residential development. This inclusion of this site will make a significant contribution in redressing the imbalance in housing and will make a substantial contribution to the provision of affordable housing in all its different forms. It is considered that this will add significant weight to the inclusion of the site than was previously envisaged and more important at this time with the current delay in the Local Plan and the clear evidence on housing need. The site is an appropriate scale and location in terms of meeting the comments by the Inspectors and ensuring housing need is met.
- 1.5 The Statement, therefore, seeks support for the inclusion of the site. In seeking support for the selection of this site, I deal with three matters. The first is housing need, secondly the Green Belt assessment and finally the sustainability of the site. The site is available now and will provide much needed affordable housing. Before dealing with these matters, I refer to the Settle Group and site considerations.

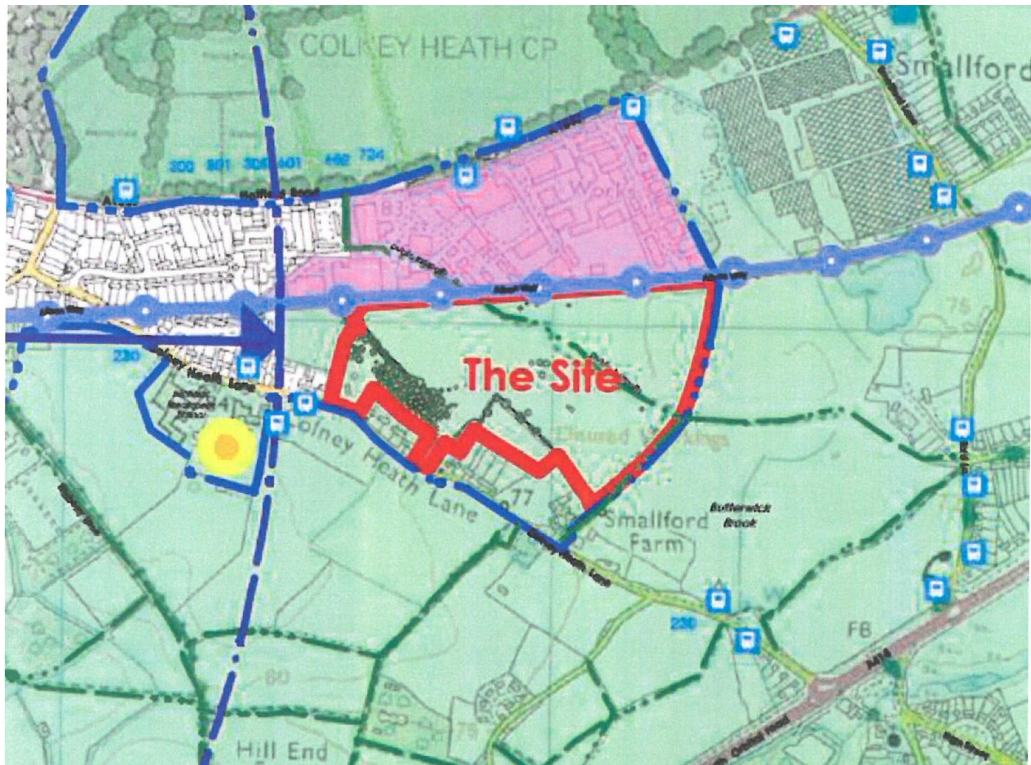
2. SETTLE GROUP

- 2.1 In 2003, the Council Homes in North Hertfordshire were transferred to a new housing association with the aim of improving tenants' homes and creating the capability to build more affordable housing. This became the Settle Group, with the aim to deliver more high-quality affordable homes. There is now a clear Plan for 2024 with four strategy themes.
- 2.2 These themes are focused on the delivery of good services, ensuring well run homes, delivering more affordable homes and developing a fully funded investment programme. There is an important social purpose in the delivery of affordable homes in all categories to provide much needed homes. The aim is to meet a need across Hertfordshire, improve and maintain space standards, ensure affordability and to improve neighbourhoods.

- 2.3 The Settle Group's purpose is to assist people who are struggling to find a suitable place to live. They help their customers to stay in their homes comfortably so that it is possible for them to live the life they choose. As a charitable association, Settle Group is a proud provider of social housing, currently managing over 9000 properties in Bedfordshire and Hertfordshire.
- 2.4 With a strong financial standing, G1/V1 rating from their Regulator, and supported by Homes England partnership status, Settle Group have increased their growth ambitions to play their part in solving housing challenges. The Group has an established track record of delivering high quality affordable housing in partnership with St Albans Council, including attractive flexi-care homes and temporary accommodation, alongside homes for rent and shared ownership.
- 2.5 While some sites put forward in the call for sites will be speculative, the important factor with this site is the commitment both by the land owners and the Settle Group to provide affordable housing where it is needed and in a sustainable location. The development of the site can be delivered quickly and its inclusion in the Local Plan will ensure a specific housing need is met with certainty.

3. SITE CONTEXT

- 3.1 The site comprises a triangular piece of land to the south of Alban Way. The site adjoins development with commercial/the Retail Park to the north and properties fronting Colney Heath Lane to the south. The site benefits from good access and connections with the surrounding area and links into the City. This includes the Alban Way footpath and cycle path which runs along the northern boundary of the site into the town centre. The site is also adjacent to the employment area which had been allocated in the former emerging Local Plan. It lies close to local services, is served by public transport and has good access for walking and cycling. The site represents a sustainable location.
- 3.2 The site has an area of some 20 hectares. It is bound by Alban Way and Alban Retail Park to the north and the residential development along Colney Heath Road to the south. It is roughly triangular in shape, comprising rough grassland. The majority of the land formed part of the former sand and gravel pit which was subject to infill during the 1980s. The site currently lies within the Green Belt. The call for sites provides the opportunity for the boundary of the Green Belt to be changed and the site included in the Local Plan.



Site location Plan

4. PLANNING HISTORY

- 4.1 The planning history of the site essentially relates to land workings. As indicated at the beginning of this Statement, there has been a number of representations made over the last 10 years on the emerging Local Plan.
- 4.2 These can be summarised as relating to the consultation in 2010 on the Core Strategy and Housing Allocations; in 2014 on the draft Strategic Local Plan consultation; further representations in 2015 on the Strategic Sub-Areas; in 2016 on the draft Strategic Local Plan and also on the Submission Draft; in 2018 on the 'Call for Sites' and later in 2018 on the draft Local Plan.
- 4.3 The landowners have also consulted with neighbouring residents and the Parish Council. Discussions have been held with the County Council both as landowners of adjoining land and as the highway authority. A representation has also been made in respect of the Neighbourhood Plan Call for Sites in support of this site in the emerging Neighbourhood Plan on the same basis for affordable housing.

5. HOUSING NEED

- 5.1 The Annual Monitoring Report 2019 indicates that the housing land supply position is less than 5 years. The figures suggest that at April 2019, between 1.9 and 2.6 years only could be identified. In relation to the emerging Local Plan, the evidence presented, largely based on bringing forward allocated land for residential development, was around a 5 year supply. Evidence provided by the House Builders Federation was particularly critical on the Local Plan strategy to provide new housing on a relatively small number of large sites. This has been part

of the issues raised by the Inspectors in their letter following the halting of the Local Plan Examination. The House Builders Federation indicated there was less than 3 years supply of housing land. They also indicated that the 2018 Housing Delivery Test for the District was 58% which requires the Council to include a 20% buffer in the calculation of the 5-year housing supply assessment. The results for 2019 do not improve the situation. Overall, over the period 2016 to 2019, only 61% of housing requirement has been met.

- 5.2 In August 2020, the Government consulted on proposals to change the standard methodology for calculating local housing need. Under these provisions the need for St Albans would increase and, as a consequence, it was argued the housing supply figure would be only 1.37 years. Even if the higher figure of 1.9 years is used, there is a significant shortfall. The site will help to provide much needed affordable housing in the short term.
- 5.3 The position on housing land is a significant consideration in assessing the call for sites. The withdrawal of the Local Plan and the absence of allocated and deliverable sites for housing will continue to have implications for housing supply and particularly the provision of affordable homes. The inclusion of this site will meet a need for affordable units quickly and in a sustainable manner. Clearly, as presented in the Monitoring Report and to the Examination on the Local Plan, the position is worse as the Local Plan is withdrawn and the locations for houses not released from the Green Belt. The clear criticism provided by the Inspectors on the choice of sites and the Green Belt assessment, places this in greater uncertainty. The contribution made by this site to housing land supply which is deliverable would be significant.
- 5.4 Essentially, the proposed stepped housing requirement proposed in the Local Plan would have provided the Council with a five-year housing land supply on adoption of the Plan and for the early years of the plan Period. However, we now have no Local Plan and a strategy which would have delivered more homes later in the Plan period actually ignores the opportunity to identify smaller sustainable sites that could be removed from the Green Belt in order to improve delivery in the short and medium term. This is the impact this site can make.
- 5.5 The Council has not undertaken an appropriate assessment of smaller scale areas in the Green Belt than the larger locations previously chosen. The development strategy taken forward in the Local Plan has been heavily criticised. In our view, the Council has chosen not to consider development opportunities in those smaller parts of the identified and broad-brush assessment areas and not to examine in more detail whether there are other small-scale sub areas that could be removed from the Green Belt to enable their development. It is our view that the inclusion of this site will address the shortfall in the early part of the Plan period specifically for affordable housing. The Council should consider the potential for removing smaller areas of land from the Green Belt in sustainable locations. I deal with this again in the section on Green Belt.

6. THE PROPOSALS

- 6.1 The previous representations made on the emerging Local Plan have sought to establish the principle of development, set out detail on the development and provide an indicative masterplan. In respect of this submission for the call for sites, the details which were provided as part of the previous representations have changed, as has the status and position in respect of the emerging Local Plan.

6.2 A number of elements remain part of the proposals, with vehicular access off Colney Heath Lane (two locations), provision of open space and enhanced landscaping and through development of the improvement to services and highway. Details of the possible access points are shown below.



Land Between Colney Heath Lane and Alban Way,
 (To the rear 113-167), Colney Heath Lane, AL4 0TN

7. PLANNING POLICY

7.1 This Statement confirms the request that this site is included as a potential area for residential development comprising 300 affordable homes. Normally, in promoting the site it would be necessary to assess the potential development against the Development Plan. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states *“if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise”*.

7.2 In this case, we are seeking the inclusion of the site in the new Local Plan and, therefore, if chosen it would be part of the Development Plan. The current difficulty surrounds the status of the Development Plan and it is due to the position regarding the age of the adopted Local Plan Review 1994, that there is a current local planning policy vacuum. It is apparent that there is a critical need for housing, particularly affordable housing in St Albans as this has not kept up with the requirements. The site will specifically meet this need.

National Planning Policy Framework (NPPF)

- 7.3 Central Government advice is contained in the National Planning Policy Framework. The most relevant aspects of the revised NPPF to the consideration of the site can be summarised as follows.
- 7.4 The Framework recognises that the purpose of the planning system is to contribute to the achievement of sustainable development. To achieve sustainable development means that the planning system has three overarching objectives: social, economic, and environmental; which should be delivered through the preparation and implementation of Plans and the application of the policies in the Framework. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account to reflect the character, needs and opportunities of each area (paragraphs 8 and 9).
- 7.5 At the heart of the Framework is a presumption in favour of sustainable development.

For Plan-making this means that:

- a) *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For decision-taking this means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. (paragraph 11)*

- 7.6 The presumption in favour of sustainable development does not change the statutory status of the Development Plan as the starting point for decision-making (paragraph 12).
- 7.7 The Framework recognises that the planning system should be genuinely plan-led; with plans providing a positive vision for the future of each area (paragraph 15). The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area (paragraph 17). Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development (paragraph 23).
- 7.8 Section 5 of the Framework relates to delivering a sufficient supply of homes. It is the Government's objective to significantly boost the supply of homes and ensure a sufficient amount of land can come forward where it is needed. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment (paragraph 60). Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 7.9 Section 13 of the Framework deals with the protection of Green Belt land. The fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open. Green Belt serves five purposes, as set out in paragraph 134 and I deal with the site in relation to these purposes later in the report.
- 7.10 Paragraphs 143 to 147 deal with proposals affecting the Green Belt. Inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Substantial weight is given to any harm to the Green Belt. '*Very special circumstances*' will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other circumstances. Exceptions to this can relate to affordable housing, albeit on a smaller scale than the proposed site. It is noted that draft policies in the emerging Local Plan reflected this, supporting small scale affordable housing as a '*very special circumstance*'.

Strategic Local Plan

- 7.11 The Local Plan identified that all Category 1 settlements would expand at broad locations for development. As submitted, the Local Plan included, as one of the broad locations, Park Street Garden Village. The exceptional circumstances required for Green Belt release for development was considered only to exist at broad locations set out initially in Policy S6. The draft Local Plan identified a need for some 900 dwellings per annum with the requirement divided into 5 year periods and a lower annual requirement considered applicable in the first 5 years of the Plan.
- 7.12 Importantly, the Local Plan referred to affordable housing and to the need for contribution from developers and the achievement of 40% affordable homes on the major sites. It is considered that the scale of development over recent years has failed to deliver sufficient affordable homes.

- 7.13 Leading up to the decision to withdraw the Local Plan, the Inspectors raised a number of matters and it is considered that the inevitable delay to the Local Plan still requires development to be permitted and housing need to be met. There were three issues raised by the Inspectors which are considered relevant to the consideration of this site for development. These refer to the housing need, which I have already referred to, the assessment of the Green Belt, and the site selection process.

Green Belt

- 7.14 The Council is currently re-assessing the suitability of areas in the Green Belt for development. We believe that aspects of the proposed alterations to the boundary of the Green Belt are flawed. This view is based on an assessment of the Green Belt Review commissioned by St Albans, Dacorum and Hatfield-Welwyn Councils. We have looked at the evidence set out in the Green Belt Review and concluded that the evidence base has not been followed consistently when identifying potential alterations to the Green Belt boundary.
- 7.15 We consider that this site is a sustainable and deliverable site that could be developed with the Green Belt boundary realigned. We believe that this is preferable compared to others, on the grounds that it contributes less to the Green Belt purposes than many of the sites previously chosen and that it conforms with the criteria identified as important more successfully than some of the other sites in the previous reviews.
- 7.16 In assessing the site as part of this call for sites, we have looked back at the Green Belt Review and the representations made at various stages in the progression of the Local Plan. The criticism made by the Inspectors raised the relevance of the conclusions reached in the Local Plan and the Green Belt Review itself and the scale of development which is suitable. It is our view that the site we are promoting has not been properly assessed due to it only being seen as part of a much larger site to the east.
- 7.17 Therefore, if we assess the site as a small part of the strategic parcel the previous review identified, this would enable the site to be considered more highly and would provide sustainable residential development. In particular, the site would not contribute to merging of towns and is not large enough to change the character of St Albans.
- 7.18 The Green Belt Review process was broken down into two stages. Part one examined the Green Belt in three Districts Council areas, Dacorum Borough Council, St Albans City and District Council, and Welwyn-Hatfield Borough Council. The study identified 60 'Strategic Parcels' of land. The study assessed each parcel for its contribution to the 5-purposes for Green Belt set out in paragraph 80 (2012 version) of the National Planning Policy Framework.
- 7.19 The second part looked at eight 'sub-areas' of these strategic parcels that it was considered were deemed suitable for development as they contributed little or nothing to the Green Belt purposes. Set out below, we have examined the 60 strategic parcels and comment on how the parcels compare with each other and parcel GB35. In addition, I assess the site and its contribution to the Green Belt purposes using the criteria used to assess and support the land put forward in the Green Belt Review.
- 7.20 The outcome of the overall study was the process by which each 'strategic parcel' is rated against the 5-purposes set out in the NPPF. This was presented as Task 2 (identifying strategic parcels) and Tasks 3 and 4 assessing the contribution that each parcel makes toward each Green Belt purpose.

- 7.21 However, as we have raised in our pre-application consultation and in correspondence with the Spatial Planning Officer, these ratings were set aside in choosing potential sites for development as several of the sub-areas suggested for development are in parcels that score least well. The parcel which contained the site subject of this Statement, GB35, is one of the five parcels that was considered contributed least to the Green Belt purposes. This suggests that this parcel is one of the most appropriate for development.
- 7.22 The Green Belt report confirmed that Strategic Parcel 35 does not contribute to purpose 1. In relation to purpose 2, the gaps between settlements, the site would not impact on the strategic gap as shown by the illustration below. It is reasonable to conclude that the location of the site within this strategic gap is not right as if account is taken of its location and surrounding development, this site does not affect the gap.
- 7.23 If we consider the site in relation to the existing built up areas, its development would broaden the existing development area and would not reduce the gap or separation between the two settlements.



This illustrates the location of the two previously proposed developments between St Albans and Hatfield. The site is also shown.

- 7.24 It is considered that the site, with development to the south, west and north, will fill in the area between this development. It does not link to other development further out in the Green Belt. It is considered also that in the context of Green Belt purpose 2, the subject site is an appropriate location and has less impact on the Green Belt than some sites previously chosen.
- 7.25 In respect of purpose 3, to assist in safeguarding the countryside from encroachment, the site is one of the three areas in the Review that make little or no contribution. All of the proposed development sites are located in strategic parcels that contribute more to the purpose than parcel GB35. In this context, the site is a more appropriate location for development than all but 2 other strategic parcels.
- 7.26 In respect of purpose 4, to preserve the setting and special character of historic towns, it is noted that parcel GB35 was rated as providing a partial contribution to the setting of St Albans. Once again, this conclusion is based on a larger area and in our view the site occupies part of the parcel that does not contribute to this purpose. The subject site is surrounded by development on three sides and is not visible. There will be sufficient opportunity to

strengthen the eastern boundary and limit any impact.

7.27 The second part of the Review considers the merits of the eight largest development sites. If this assessment was undertaken only on the site we are now promoting, it is clear that the site would be the second most suitable site for development and taken out of the Green Belt.

REF	Parcel	Site	A - Green Belt Review			B Constraints	C Integration	D-Sensitivity	Tier	Rank
			Significant	Partial	Limited/ no					
8	GB25	Land at Chiswell Green	0	1	4				1st	1
	GB35	Subject site.	0	1	3				1st	2
SA-S3	GB36	East of St.Albans	0	2	3				1st	3=
7	GB31	Land at London Colney	0	2	3				1st	3=
4	GB38	North of St.Albans	1	1	3				2nd	4=
5	GB40	Northwest of Harpenden	1	1	3				2nd	4=
6	GB40	Northeast of Harpenden	1	1	3				2nd	6
SA-S2	GB22a	East of Hemel Hempstead	1	1	3				3rd	7=
SA-S1	GB21a	East of Hemel Hempstead	1	2	2				3rd	7=
SA-S2	GB22a	East of Hemel Hempstead	0	2	3				3rd	9

Table modified to include the site

7.28 Therefore, if we used the criteria set out in the previous Review then it can be concluded that it scores well in terms of not impacting badly on the five purposes of including land in the Green Belt. The site comprises a triangle of land enclosed on two sides by existing development.

7.29 The area identified as Strategic Parcel GB35 was seen to contribute significantly to only 2 Green Belt purposes, by preventing merging (of St Albans and Hatfield) and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It adjoins a number of built uses and urbanising influences but represents a relatively open landscape. However, the site is strongly influenced by urban development being enclosed on two sides and this limits the contribution of this site to the wider Green Belt and its role in separating settlements. The site is also affected by commercial/industrial development to the north along Hatfield Road (A1057). The site is bounded on the south and south-west by residential development.

7.30 The site has a limited impact on the overall role of the Green Belt and the physical separation of settlements. It would not reduce the existing minimum distance of gaps from St Albans to Hatfield. The sub-area makes a limited or no contribution towards checking sprawl, preserving setting or maintaining the existing settlement pattern.

- 7.31 The site represents a sustainable location for development and will integrate with the existing urban area. It is situated on the eastern edge of St Albans. The town centre is located approximately 3km to the west of the sub-area. The designated Green Belt settlement of Smallford (GBS.9) lies 700m to the east of the sub-area. St Albans Railway Station is located approximately 3km to the west of the sub-area. The Station offers regular services to St Pancras International and between Luton and Bedford to Brighton. St Albans Abbey Railway Station is also located 3.3km to the south-west of the sub-area. This Station provides a service between St Albans and Watford Junction. There are a number of bus services that run near to the site also. These services provide connections into St Albans town centre but also to Stevenage, Hemel Hempstead, Hitchin, Welham Green, Hatfield, Watford, Redbourn, London Colney, Harlow and Heathrow Airport.
- 7.32 There are a number of schools in the area including Beaumont Secondary School and Oaklands College. Nicholas Breakspear Catholic School is 400m to the west and Verulam Boys Secondary School lies 2km to the west. The site contains open space. There are also a range of surrounding open spaces within 1km of the site including Longacres to the south-west, and Fleetville along Hatfield Road. As indicated above, Alban Way, a dismantled railway and Green Corridor runs in an east to west direction adjacent to the northern boundary of the sub-area. It is a designated walking and cycling route between St Albans and Hatfield.
- 7.33 Previously, a landscape appraisal of the site/area was undertaken to take account of landform, land cover, cultural dimensions, levels of enclosure and visual attributes. This concluded:-

On landform

- The landform falls slightly towards Butterwick Brook
- It is characterised as part of the De Haviland Plateau
- The site is part of the Upper Colne Valley
- It is listed as land forming part of Watling Chase Community Forest/Country Wildlife Site, contributing less than 0.05% to the Watling Chase area

In respect of land cover and land use

- The sub-area comprises ground left behind after mineral extraction. It has a non-descript scrubland /paddock character
- The land is not high quality farmland
- Other notable land use elements within the area include pocket woodland behind houses on Colney Heath Lane, and deciduous trees running along Alban Way. Some of these trees have TPOs. The stream, Butterwick Brook, provides a permanent visual and physical boundary to the east of the sub area

Built and cultural heritage aspects

- There are no known designated heritage assets within the area. To the south of the southern boundary of the area are two listed cottages

Levels of enclosure

- The landscape is most open towards the south-east. However, views are affected by the proximity of the A414
- The native planting along Butterwick Brook provides a sense of enclosure

- The existing settlement edges of St Albans have a ribbon like character, along Hatfield Road and Colney Heath Lane
- Other development and settlements in the Green Belt, on Smallford Lane, detach the area from the wider Green Belt

Landscape Sensitivity

- This section considers the sensitivity of the landscape and the visual effects associated with potential development within the sub-area on landscape character
- The surrounding urban edges are strong and clearly defined by the adjacent development and road network. Much of landscape has been modified and field boundaries have been lost
- Key landscape features that make a valuable contribution are Butterwick Brook to the east of the site, the maturing trees along Alban Way and the copse of trees behind houses in Colney Heath Lane
- Sensitivity to change varies across the sub-area. The western part is of lowest sensitivity as it is influenced by the strong adjacent urban edge and its enclosure by the same. The sub-area becomes more open nearer to Butterwick Brook
- The sensitivity of the southern part of the sub-area relates to the two listed cottages on Colney Heath Lane

- 7.34 It is considered therefore that the key findings of the assessment including landscape appraisal and sensitivity analysis, in addition to the consideration of the location of constraints and creation of sustainable patterns of development, the most appropriate land for potential release from Green Belt for residential led development is the western part of the sub-area, the site now being put forward.
- 7.35 In terms of the Green Belt, the Inspectors were critical of the approach and site selection in the Local Plan. The analysis of strategic parcels in isolation offered only basic information. It is considered that if we apply the same principals identified in the previous Green Belt Review, Parcel GB35 seems an appropriate location for development. The site should be ranked higher than the majority of other sites. Using the same criteria as in the previous review, the site ranks very highly as an appropriate and sustainable site for development.
- 7.36 The constraints on development due to Green Belt is recognised in the Local Plan. The criticism of the Green Belt study raised by the Inspectors, and its failure to be updated to reflect a larger housing need, provides an opportunity to undertake a re-assessment. It is understood that this will be undertaken and it is important to be part of this assessment as, in our view, the past assessment was incorrect in its conclusions on the land south of Alban Way. The Inspectors have indicated that a new Green Belt Review is required and all options be considered. Other Green Belt locations can be assessed which are not strategic sites and may score lower. A variety of sites is important to the strategy.
- 7.37 It is considered that the proposed site does score better in the current circumstances. A site specific Green Belt assessment would help to differentiate the actual impacts of the site on the five purposes of the Green Belt from the overall impacts which are associated with the remaining part of Parcel GB35. The Inspectors request an assessment of smaller sites including those in the Green Belt. The fact that Parcel GB35 was seen to make a significant contribution to preventing St Albans and Hatfield from merging is not true if the test is applied solely to the above smaller site. Development would not decrease the gap and its development would not encroach into the land between the A414 to the south and the Hatfield Road to the east of

the built-up area north of the site. Therefore, the smaller part of Parcel 35 which comprises the proposed site would not conflict with the functions of the Green Belt in the same way as the larger part and remainder of this area do.

- 7.38 In the Green Belt assessment, the analysis was based on a larger area but even in this respect the study concluded that the level of impact from built development was high. Wrongly, the study indicated that the area was away from the built-up area and saw a narrow gap to be protected. The development of the site will not encroach into that gap.

Site selection

- 7.39 The Inspectors also expressed concerns on the site selection process, for example, Green Belt sites which were discounted early because they were rated '*red*'. I have commented above in terms of the proposed site. While a detailed assessment may be required, which I consider would raise the standing of the site which an overall assessment of Parcel 35 previously did not, I consider that delays to the provision of much needed housing and, in particular, affordable homes should be avoided. The site is deliverable and meets that need.

8. PLANNING CONSIDERATIONS

Acceptable in Principle

- 8.1 It is considered that the site is both suitable for development and is deliverable, meeting the important need for affordable homes.
- 8.2 The site represents damaged countryside and is bounded on three sides by development. That development also makes a substantial impact on the visual quality of the site, although it is acknowledged that this is not one of the purposes of the Green Belt. However, what it does say is that the site is less important in Green Belt terms than the wider area to the east. Given the location between development, it is considered that the proposals would not reduce the visual gap between the towns. As it is fully acknowledged that Green Belt land is needed for development, the proposed site will not harm the wider area identified as GB35 nor cause unrestricted sprawl.
- 8.3 The site is already influenced by urban development, has strong boundaries which relate the site well to built development and its loss to affordable housing will be sustainable. The Green Belt study acknowledged the influence of the built development and that the countryside had been encroached into already. The narrow gap between St Albans and Hatfield is not reduced by the development of the site.
- 8.4 Planning policy on Green Belt requires very special circumstances to be identified in order to overcome the objection to inappropriate development. The Local Plan recognises the need for housing and the loss of Green Belt land to achieve the requirement in the Plan period. The recent comments by the Inspectors and the uncertainty on the Local Plan represent circumstances in support of the principle of housing. The previous assessment considered this site as part of a wider area and it is our view that the site, which would provide up to 300 affordable homes, represents a sustainable location which would not conflict with the purposes of the Green Belt nor the settlement pattern. Affordable housing represents very special circumstances. The site is deliverable and will meet a need not being met adequately so far, at a time when housing land supply falls short of the requirement. The site is low quality

Green Belt, is impacted by surrounding developments and negligible in respect of any agricultural value.

9. SITE SELECTION

- 9.1 It is considered that the site which would be developed and provide 100% affordable homes, would not cause harm to the purposes of the Green Belt and would not harm the gap between settlements. The current position on housing land supply relies on the deliverability of allocated Green Belt sites which have now been questioned by the Inspectors and subject to review. The absence of deliverable sites is critical and the provision of affordable homes as needed supports the selection of this site.
- 9.2 The site represents a sustainable location which can deliver up to 300 affordable homes. The site can be accessed satisfactorily, is well connected to services and facilities and will improve the supply of affordable homes. The latest published information and various documents submitted as part of the Local Plan Examination indicate that there is a real need for housing in the first 5 years of the Plan period. Circumstances have also changed with the recent comments by the Inspectors and the delivery of housing, particularly affordable homes, is a significant consideration.
- 9.3 The site would provide much needed affordable housing in the area, increasing the range of affordable homes. This would improve the opportunity for existing residents and new residents to locate locally. The development overall will generate new jobs and the ability for more expenditure in the area and on local services.
- 9.4 The site would result in an increase in the provision of affordable homes, boosting housing supply in an area where there is a shortfall. The development would improve the environmental quality of the land and provide more opportunities for people to find an affordable home.
- 9.5 It is considered the benefits of boosting housing supply for affordable homes and the sustainability of the proposal are strong reasons to select this site for development. The selection of this site will help to meet an important need and assist in meeting the overall requirement for new homes in the short term in response to the significant shortfall.

25 January to 5pm 8 March 2021
'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

Please do not submit sites that:

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

By online consultation portal:

<http://stalbans-consult.limehouse.co.uk/portal/>

By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

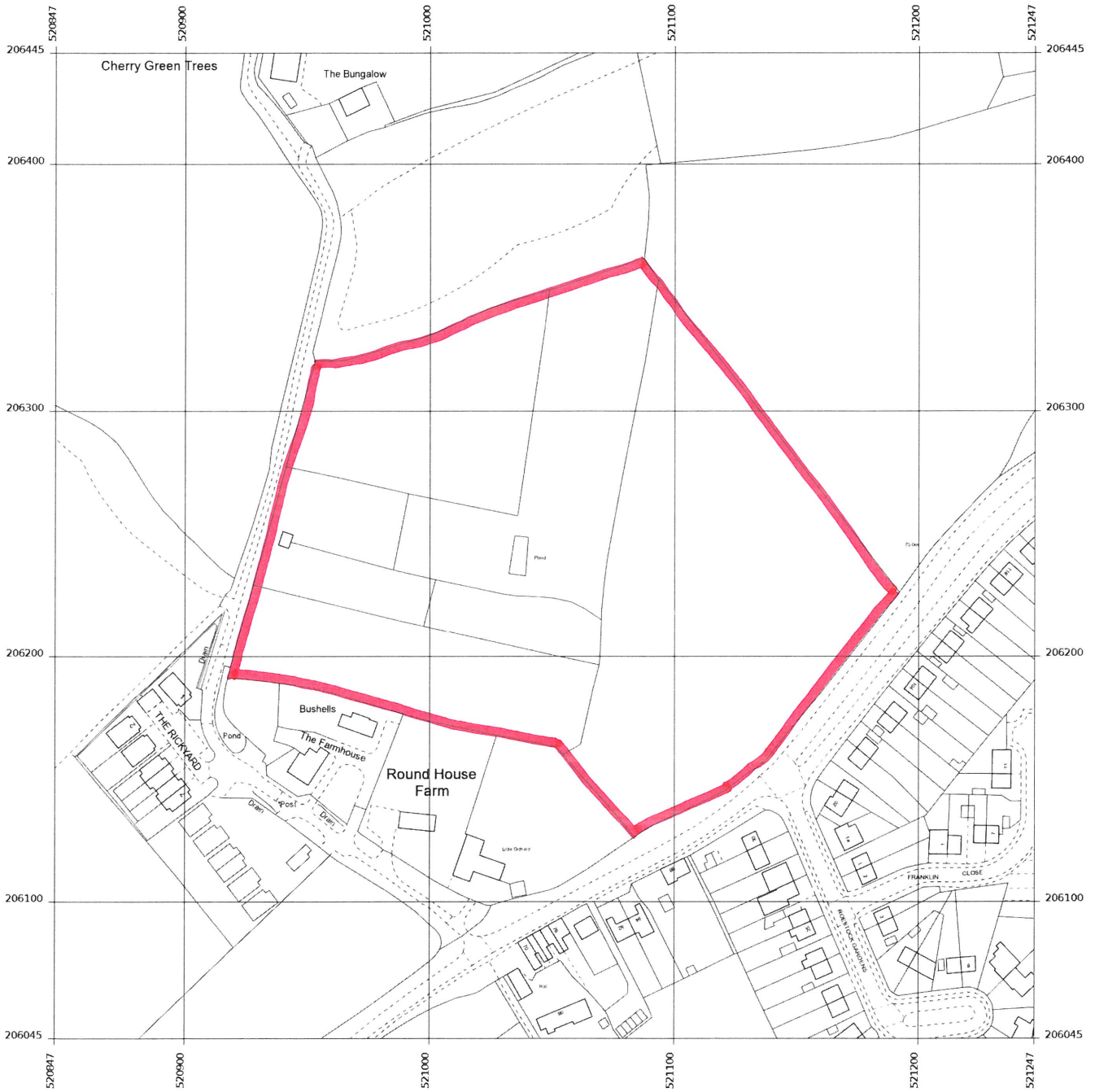
Your Details	
Name	Simon Andrews
Company/Organisation	DLA Town Planning Ltd
Address	5 The Gavel Centre, Porters Wood, St Albans
Postcode	AL3 6PQ
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details					
Requirements:	<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 				
Site address/location (Please provide a map showing the site boundary)	Manor Garden Park, Roundhouse Farm, Roestock Lane, Colney Heath				
Site area (in hectares)	3.88ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td>521058</td> <td>Northing</td> <td>206239</td> </tr> </table>	Easting	521058	Northing	206239
Easting	521058	Northing	206239		
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	████████████████████				
Current land use	Vacant, open field				
Condition of current use (e.g. vacant, derelict)	Vacant				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	<p>The particular form of development proposed will help meet a substantial need for housing designed for older people. In doing so it will secure the benefits of downsizing both for older people and younger families, thus improving the housing market.</p> <p>Exceptional circumstances to justify removing the site from the Green Belt include:</p>				

	<ul style="list-style-type: none"> • the provision of housing; • the specific provision of older persons accommodation; • the proposed parking for guides area; • the provision of a community facility within the site; and • the availability of communal facilities for the local community
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years

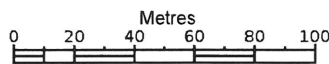
Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Topography affecting site (land levels, slopes, ground conditions)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	<input checked="" type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No There is a listed building on the opposite side of Roestock Lane (no. 68 Roestock Lane), which is around 85 metres from the site.
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history)	
Other comments		



Produced 07 Sep 2017 from the Ordnance Survey MasterMap (Topography) Database and incorporating surveyed revision available at this date.

The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.



1:2500



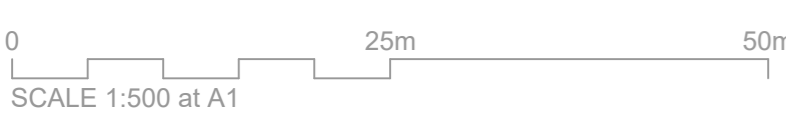
Roestock Ln, Colney Heath, St Albans

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 database rights 2017 OS100035409
 Order Licence Reference: OI1158961
 Centre coordinates: 521047 206245

ACCOMMODATION SCHEDULE	
6	1 bedroom houses, 120m ²
13	2 bedroom houses, 180m ²
14	1 bedroom apartments, 63m ²
16	1 bedroom living plus apartments, 63m ²
24	2 bedroom living plus apartments, 90m ²
1	Gym and spa, 720m ²
1	Doctors surgery, 180m ²
1	Pharmacy, 180m ²
1	Wellbeing commercial, 180m ²
1	Coffee shop, 180m ²
1	Nursery, 280m ²



Proposed site plan
SCALE 1:500 at A1



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This drawing is to be read in conjunction with all relevant consultants' and/or specialists' designs.
All queries relating to design of foundations, floor slabs and any structural elements are to be referred to the structural engineering consultant for resolution. The workmanship of all relevant trades and building operations shall comply with the recommendations of British Standard (BS).
All design and construction is to be in accordance with the Construction, Design and Management Regulations 2015.

REV



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MANOR GARDEN PARK
ROESTOCK LANE
COLNEY HEATH
DRAWING TITLE
PROPOSED SITE PLAN
STATUS: **PLANNING** DATE: **23.10.2020**
PROJECT NUMBER: **1286** DRAWING NUMBER: **002** REVISION:



Manor Garden Park, Roundhouse Farm Roestock Lane, Colney Heath

St Albans Call for Sites response 2021

Planning Report on behalf of Ryan Franklin-Smith

DLA Ref: 17/296

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1.0 INTRODUCTION

1.1 This report has been produced to aid consideration of the site through the Local Plan process. The Council is starting work on a new Local Plan and, in planning for an increased level of housing, acknowledges that Green Belt sites will be needed for housing development. This report follows previous Call for Sites submissions to St Albans City and District Council.

1.2 The report is commissioned by Ryan Franklin-Smith who, on behalf of the Franklin-Smith family, is promoting the site as a retirement development.

1.3 There is a need for housing in Colney Heath to meet locally arising need. As a sustainable settlement, there is also a role for development in Colney Heath to contribute to meeting the wider housing requirement across St Albans district.

1.4 The Manor Garden Park site to the north of Roestock Lane is no longer viable for agricultural use. The field is too small for modern agricultural machinery and is therefore uneconomic to farm. Moving forward, an alternative use needs to be found for the site. The site is in a sustainable location and is suitable for development. There are no physical constraints that would

prevent development and the site makes a limited contribution to the purposes of the Green Belt.

1.5 The site is deliverable and could be brought forward for development early. It is in a single ownership and the owner is committed to pursuing development on the site. As such it could make a meaningful contribution to housing need in the early part of the plan period.

1.6 Moreover, there are many benefits associated with the development that will enhance the local community. These benefits, together with the acknowledged need for housing and particularly for older persons' housing, constitute the exceptional circumstances needed to remove the site from the Green Belt.

2.0 SITE & CONTEXT ANALYSIS

2.1 Location

The site, as shown in Figure 1 below, is located to the north of Roestock Lane, to the east of the village of Colney Heath. Colney Heath is defined in the adopted Local Plan as a Green Belt Settlement.

2.2 Context

The site is approximately 3.88ha in size and was previously farmed, with hedgerows running along the entire length of the site boundary, as well as through the middle of the site. The site is no longer viable for agricultural use as it is too small for modern agricultural machinery. An alternative use for the site therefore needs to be found.

2.3 Access

Vehicular access to the site is taken from Roestock Lane and pedestrian access to and from the site can be gained by various public rights of way which link into the site.

2.4 Development Plan Notation

The land constraints attached to the site are that it lies within the Metropolitan Green Belt and is within a Landscape Development

Area. The site is not within flood zones 2 or 3, does not have any Tree Protection Orders on the site, and is not within a Conservation Area. There is a listed building on the opposite side of Roestock Lane (no. 68 Roestock Lane), which is around 85 metres from the site.



To the west and the north of the site are open fields.

To the west of the site is Roundhouse farm

To the south of the site is the residential area on the other side of Roestock Lane. It is mostly characterised by detached and semi-detached housing.

Figure 1: Immediate Context Surrounding the Report Site

2.5 Local services

The Site is in close proximity to local facilities, as set out in the Table below.

Table 2.5: Summary of Local Services (approximate measurements)

Facility	Local Provision	Proximity to site (km)
Education	Colney Heath School & Nursery	1.3
	De Havilland Primary School	2.0
	Nicholas Breakspear Catholic School	3.3
Retail	Colney Heath News	0.6
	One Stop Stores	1.3
	South Hatfield Post Office	1.3
Health	Hilltop Dental Surgery	1.4
	Northdown Road Surgery	1.4
	Jhoots Pharmacy	1.4
Leisure	Hatfield Leisure Centre	2.0
	St Johns Youth and Community Centre	1.2
	Roestock Park	0.5

2.6 Accessibility

The site easily accessible from a number of transport methods. By car it is within 10 minutes of the A1(M), the North Orbital Road, and the M25. In terms of train accessibility, it is within 4 km of Welham Green Station. Welham Station operates on the Great Northern Line which runs from Kings Cross to Stevenage and

Peterborough. There is a bus stop within 600m of the site, which is served by the 200, 312, and the 305 buses. The 200 and the 312 buses run irregular services from Essendon to London Colney and from Hatfield to Welham Green, respectively. The 305 bus runs a more regular service from Welham Green, via St Albans, to Sandridge.

3.0 STRATEGIC CONTEXT

3.1 This Call for Sites opportunity marks the start of a new Local Plan process. With the withdrawal of the draft Local Plan in 2020 following the withdrawal of the Strategic Local Plan in 2017, the need for an up-to-date strategic framework for development is more urgent than ever.

3.2 The objectively assessed housing need for St Albans district is around 900 dwellings per year. This should be the starting point. However, the Council will also be aware of neighbouring authorities that are struggling to meet their own housing requirements. The Council will need to have open and constructive dialogue with these authorities if it is to satisfy the Duty to Cooperate. The potential for St Albans district to assist with meeting housing needs from surrounding areas should not be dismissed at this stage. There is considerable development potential within the district, partly stemming from the fact that Green Belt boundaries have not been properly reviewed for around 35 years. The Council should not see the 900 homes per year target as a ceiling if greater potential emerges through the Green Belt review or other evidence.

Housing need

3.3 The reliance on a Local Plan adopted in 1994 and the housing policies and land allocations therein has had a catastrophic effect on housing delivery within the district. With an annual housing target of around 900 homes per year and annual housing completions since 2001 running at 376 homes per year, a whole generation of young people have been largely unable to access the housing market. Recent performance can be judged by the latest Housing Delivery Test results for St Albans District (published in February 2021), which indicated a HDT measurement of only 63% for the period 2017/18 to 2019/20 – the 33rd worst of the 298 local authorities in England.

3.4 While housing completions have, to a degree, been propped up by recent changes to permitted development rights, these have not had an impact on the delivery of affordable housing. The target of 200 affordable homes per year from the 1994 Local Plan has not been met. Since 1994, 1,826 affordable homes have been delivered, against a target of 5,200 – only 34% of the target and a shortfall of 3,374 affordable homes. In 2019/20, only 31 affordable homes were completed – just 7% of total completions.

3.5 The delivery of a new Local Plan with updated housing targets, new housing allocations and new Green Belt releases is of the utmost importance for the district.

Housing for older people

- 3.6 The South West Herts group of authorities (St Albans, Dacorum, Hertsmere, Three Rivers and Watford) recently commissioned a Local Housing Needs Assessment for the South West Hertfordshire area. The Assessment by GL Hearn was published in September 2020.
- 3.7 As part of this work, the assessment examined the projected growth in older persons' housing need. The total population growth for the St Albans district between 2020 and 2036 as a result of applying the Local Housing Need figure (893dpa, see para 3.4 above) is calculated to be 26,128 persons. Of this total growth, 9,667 (37.7%) is projected to be in the 65+ age groups. More specifically, the number of people aged 85+ is projected to grow by 71.1% over the period, from 4,030 to 6,895 people.
- 3.8 The assessment also found that the St Albans district has the highest percentage of older persons in under-occupied homes in the South West Herts area. This suggests that larger properties are being occupied by older households who may no longer need or want family sized housing but who cannot move due to a lack of appropriate alternatives. The assessment outlines the benefits of providing appropriately sized new stock to enable "downsizing": "If this stock could be used more efficiently than the amount of land required for additional housing would be

reduced. This is because smaller properties would be provided, into which older persons could downsize, thus releasing their homes for larger households." (paragraph 7.19)

The portfolio of housing sites

- 3.9 To meet housing need will require the delivery of a mixed portfolio of housing sites. A range of sizes, types and locations will be needed to enable a wide range of housebuilding organisations to contribute to meeting needs, including arrangements for self-build properties.
- 3.10 The previous focus only on strategic sites of 500 dwellings or more must change. As highlighted by the Inspectors examining the now-withdrawn draft Local Plan, and as recognised by the Council's Planning Portfolio holder, small and medium-sized sites within the Green Belt must be seriously considered.

Green Belt considerations

- 3.11 The Council's Green Belt review from 2012 provides a useful starting point but is in no way adequate to support a new Local Plan. The focus on strategic sites must change and the Green Belt review must look at the site-specific impacts of proposed development sites. The broad-brush, coarse-grain approach to assessing parcels of Green Belt land in the 2012 Review must be developed into a more sophisticated and nuanced review of

development potential. This will include both strategic and smaller-scale housing and employment sites.

4.0 PLANNING HISTORY

4.1 Site

There is no relevant planning history for this site.

5.0 PREVIOUS SHLAA ASSESSMENT

5.1 The site was included in the SHLAA site submissions in 2017, and therefore is not included in the 2009 or 2016 SHLAA. As shown in Figure 2, from the SHLAA Update 2018, the site's SHLAA reference number is 517.

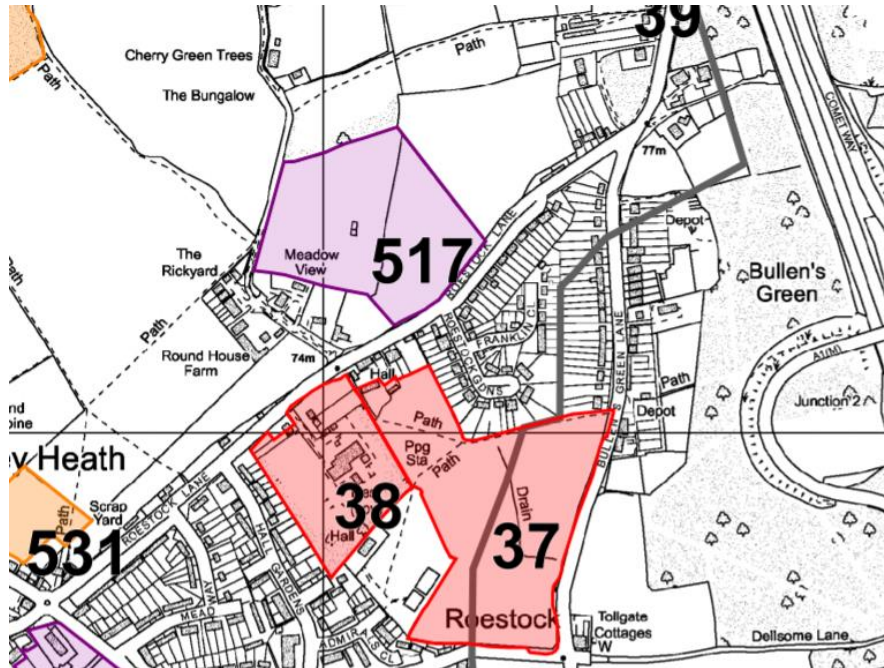


Figure 2: Site's SHLAA Reference Number

6.0 SITE CONSTRAINTS

6.1 The Council's Call for Sites 2021 pro forma seeks information on any constraints affecting potential sites. While the constraints applying to this site are discussed throughout this report, the information is summarised here in the same format as requested on the pro forma, for ease of reference.

6.2 Contamination/Pollution

No suspected issues of contamination or pollution that would preclude development.

6.3 Environmental issues

No significant environmental constraints other than the site is located within the Green Belt.

6.4 Flood risk

The site is located within Flood Zone 1 and therefore is at very low risk of flooding.

6.5 Topography

The site is essentially level such that large amounts of spoil would not need to be removed.

6.6 Utility services

It is likely that utilities are available in Roestock Lane to which a connection could easily be made.

6.7 Legal issues

It is in a single ownership and the owner is committed to pursuing development on the site.

6.8 Access

Vehicular access to the site is taken from Roestock Lane and pedestrian access to and from the site can be gained by various public rights of way which link into the site.

6.9 Other constraints

There is a listed building on the opposite side of Roestock Lane (no. 68 Roestock Lane), which is around 85 metres from the site. This is shown in Figure 3 below.

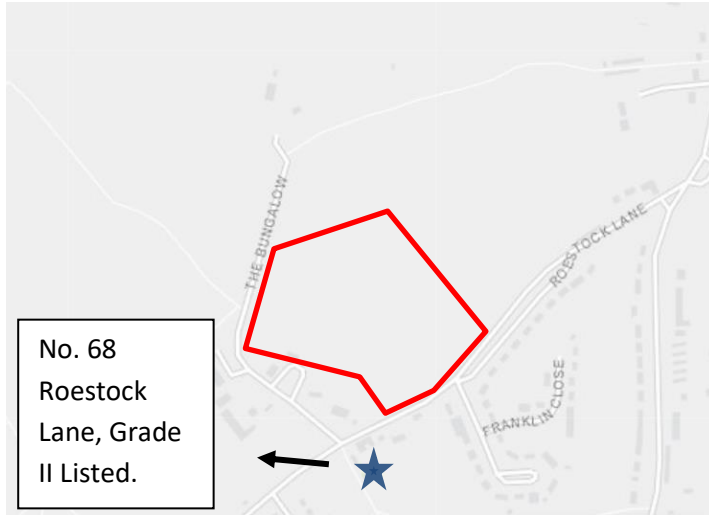


Figure 3: Location of Listed Building

7.0 OUTLINE OF PROPOSAL

7.1 The Manor Garden Park site has been promoted through a previous Call for Sites exercise run by Colney Heath Parish Council. It has also been submitted to St Albans City and District Council as part of previous Local Plan Call for Sites. The owners of the land are continuing to promote the site for a retirement development.

7.2 Form of development

The site is considered to be particularly suitable for a retirement development and an indicative layout has been produced by Inhabit Architecture showing a development of 73 units (see Figure 4). These are made up of 19 one- and two-bedroom houses, 14 one-bedroom apartments and 40 one and two bedrooms Living Plus units – residential units with on-site care provided.

7.3 Benefits of development

The proposals also include a “community hub” near Roestock Lane, which includes a gym and spa, space for a GP surgery, pharmacy, wellbeing centre and coffee shop. Space for a nursery operator is also included in this area. There is an obvious synergy between the older persons housing and the wellbeing centre, but the proposed facilities would also be of benefit to the local

community. As such, the additional facilities being provided represents a significant sustainability boost for village.

7.4 Vehicular access to the site is taken from Roestock Lane and pedestrian access to and from the site can be gained by various public rights of way which link into the site. Substantial open space will be created around the site for the benefit of both existing and new residents. Existing landscape features such as the hedges surrounding the site and running through the centre of the site will be retained and enhanced.

7.5 A significant benefit of the proposed development is the proposed parking area for use by visitors to the Cherry Green Trees Girl Guide site to the north of the report site. This camp site is extremely popular with various Girl Guide and other groups and is used most weekends from Spring through to the Autumn.

7.6 However, parents bringing Guides to the site or picking Guides up from the site currently have to park on Roestock Lane and walk to the campsite. This is somewhat inconvenient for the parents and Guides but more importantly is hugely disruptive to the local residents and users of Roestock Lane. The road is not suited to the level of on-street parking created and significant congestion occurs during pick-up and drop-off times.

8.0 GREEN BELT IMPACT

8.1 Paragraph 134 of the NPPF states that the Green Belt serves five purposes. These five purposes have been set out below with an assessment on the site's contributions to each purpose.

8.2 Purpose 1 - to check the unrestricted sprawl of large built-up areas

Whilst the site would extend the built area of Colney Heath, it is not considered that this would be 'unrestricted sprawl'. The report site would be defined by the pocket of residential development to the south of the site.

8.3 Purpose 2- to prevent neighbouring towns merging into one another

The Council's Green Belt Review included this site within a large area of land between St Albans and Hatfield, defined as area 34 and shown in Figure 5 opposite. The total area is around 419ha in size.

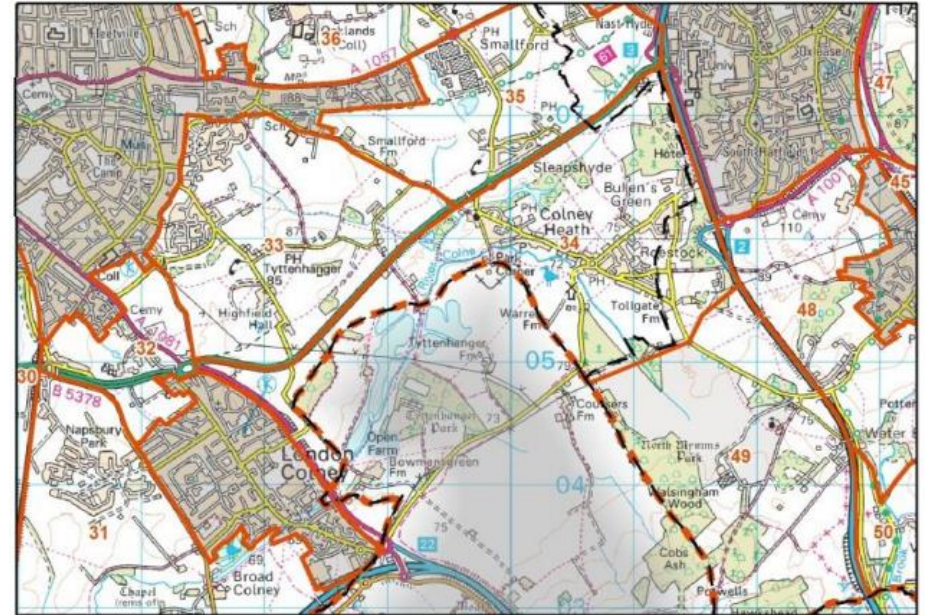


Figure 5: Area 34

The Green Belt assessment described the contribution of the entire parcel as follows: "Significant contribution towards safeguarding the countryside and maintaining the existing settlement pattern (providing gap between Hatfield and London Colney). Partial contribution towards preventing merging (of St Albans and Hatfield) and preserving the setting of London Colney, Sleepshyde and Tyttenhanger Park. Overall, the parcel contributes significantly towards 2 of the 5 Green Belt purposes."

However, there is no more fine-grained analysis of the contribution of individual pieces of land within this wider parcel. Looking at the report site itself, many of the findings for the wider parcel do not apply. Development on this site would not cause coalescence between towns, and therefore, the site is considered to make no contribution to this purpose.

8.4 Purpose 3 - to assist in safeguarding the countryside from encroachment

It can be argued that the report site makes a meaningful contribution to safeguarding the countryside, and this fact would apply to almost any Green Belt site within the district. In a situation where Green Belt sites are needed for development, it is difficult to use intrusion into the countryside to differentiate between sites since almost all sites will have some level of impact. The strong boundary features around this site help to limit any impact on the countryside and create a boundary between future built form and remaining Green Belt land.

8.5 Purpose 4 - to preserve the setting and special character of historic towns

The land does not form part of the setting of St Albans or contribute to its special character. This should be limited or no contribution.

8.6 Purpose 5 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

It is a common assumption that all Green Belt land within the District makes a significant contribution to this purpose.

8.7 Summary of harm to Green Belt

Paragraph 133 of the NPPF stipulates that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”. Thus, whilst openness is an essential characteristic, in assessing its importance this cannot be divorced from the overriding aim of preventing urban sprawl. This notion is supported by paragraph 139 of the Framework, with regard to Green Belt boundaries. This states that when defining boundaries, local planning authorities should, inter alia, “not include land which it is unnecessary to keep permanently open”. As such, it is considered that the harm would be very limited for the following reasons:

- Given the particular context of housing provision in St Albans – the historic undersupply of housing and the second oldest Local Plan in the country – unmet housing is clearly capable of constituting exceptional circumstances on its own. The provision of around 73 homes is a substantial benefit to the local area. In particular, the provision of retirement properties meets a very

specific housing need and represents a particular benefit of the proposal.

- Furthermore, the community facilities proposed as part of the development and the availability to the local community of communal facilities such as a wellbeing centre also represents a significant benefit.

- Finally, the proposed parking area for visitors to the Guides camping area to the north of the site is also a benefit to the local community.

8.8 In light of the above, there is limited value in retaining any part of the Report Site as designated Green Belt.

8.9 **New position of Green Belt boundary**

The whole of Colney Heath village is washed over by the Green Belt. To facilitate development at the report site, it is likely that the site would need to be removed from the Green Belt and this could present an opportunity to inset Colney Heath village as a whole from the Green Belt.

9.0 CONCLUSIONS

9.1 The need for housing in the district is clear. The scale of the need is substantially higher than previously planned for and accommodating this scale of growth will require a positive and proactive strategy by the Council.

9.2 It is clear that some, if not the majority, of this housing will need to be on land currently in the Green Belt.

9.3 The particular form of development proposed will help meet a substantial need for housing designed for older people. In doing so it will secure the benefits of downsizing both for older people and younger families, thus improving the housing market. The increase in the number of dwellings in the village will add to the viability of the community and facilities in the area. The scheme would also provide its own community facilities as part of the proposal. Colney Heath is a suitable location for this particular form of development given the available services and facilities and public transport.

9.4 There are no existing physical or environmental constraints on the site that would prevent development. The site itself is no longer viable for agricultural use as it is too small for modern

agricultural machinery. An alternative use for the site therefore needs to be found.

9.5 The scheme would provide the much need parking for the Girl Guides, as there is currently conflict and congestion from where the parents are waiting to drop off/pick up their children.

9.6 The site is deliverable and could be brought forward for development early. It is in a single ownership and the owner is committed to pursuing development on the site. As such it could make a meaningful contribution to housing need in the early part of the plan period.

9.7 Exceptional circumstances to justify removing the site from the Green Belt include:

- the provision of housing;
- the specific provision of older persons accommodation;
- the proposed parking for guides area;
- the provision of a community facility within the site; and
- the availability of communal facilities for the local community

Our ref: Q090075
Your ref:
Email: [REDACTED]
Date: 08 March 2021



Spatial Planning Team
Civic Centre,
St. Peters Street,
St. Albans,
AL1 3JE

By Email

Dear

**Representations to St Albans City & District Council 'Call for Sites'
Notcutts Garden Centre, Hatfield Road, St Albans, AL4 0HN
Submitted on Behalf of Notcutts Limited**

We are instructed by our client, Notcutts Limited, to put forward the Notcutts Garden Centre and surrounding land on Hatfield Road in St Albans ('the Site') to the current 'Call for Sites' consultation.

Our client is the freehold owner of the Site, which is currently partly operating as a *sui generis* garden centre.

1 Introduction

A significant issue which the emerging Local Plan must address is finding the balance between maintaining the Green Belt, respecting its five key purposes and providing sufficient land to reverse years of under delivery of housing as well as meeting the future development needs of the District.

There is insufficient urban and previously developed land in St. Albans to accommodate the Districts development needs. National planning policy makes provision for changes to be made to the Green Belt through the Local Plan. The critical need for housing or employment land can be an exceptional circumstance to justify a review of the Green Belt boundary and it is accepted that Green Belt sites will need to be released in the emerging Local Plan. However, in a letter to the Council dated 14 April 2020 (April 2020 letter) the withdrawn Local Plan Inspectors advised that previously developed and smaller scale sites should be considered for development in any future Local Plan, before releasing strategic sites.

This is a 4.1-hectare site, presented at Appendix 1, which is partly previously developed and surrounded by development. Planning permission was granted in 2017 for a quarry on the fourth side (although a more recent planning application for a larger quarry was refused in October 2020). The Site is within walking distance of Smallford and is close to public transport links. It is a small-scale site which does not contribute significantly to the Purposes of the Green Belt. In accordance with the Inspectors' letter, sites such as this should be considered for Green Belt release in the emerging Local Plan, before any strategic sites are allocated.

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For the avoidance of doubt, our client does not intend to close the existing garden centre but is requesting that the entire site, including the garden centre be released from the Green Belt. The field at the rear could be allocated for housing. The garden centre's location within the Green Belt currently restricts the owner's ability to expand and modernise. By releasing land from the Green Belt, it would help the business to grow thus retaining and creating jobs.

2 Site Context

This is a 4.1 hectare site, approximately 2.85 hectares of which is a garden centre, hardstanding, storage area and former redundant site for a plant cash and carry. Approximately 1.25 hectares is undeveloped land. It is located in the north east of Smallford, which is a settlement located to the east of the city of St Albans and to the west of the town of Hatfield. The Site is accessed directly off the A1057 (Hatfield Road), which is the main road linking Hatfield and St Albans city centre. St Albans railway station and Hatfield railway station are within 20 minutes of the Site and are accessible via public transport, via the bus stop located 100 metres to the south west of the Site.

The Site is located within the Green Belt, and is bounded by residential development to the north-west, south, and west. To the south west are numerous glasshouses associated with a produce wholesaler and to the west, across Oaklands Lane, is St Albans RFC. Planning permission was granted by Hertfordshire County Council for sand and gravel extraction (ref: PL\0755\16 (5/0394-16) on the site to the east. Across Hatfield Road, to the south, is a pub and petrol filling station.

The Site is free of environmental constraints being within a Flood Zone 1, contains no trees subject to Tree Preservation Orders (TPOs) and it is not an archaeological site for local preservation or subject to recording conditions. A public footpath borders the site on its eastern boundary but is outside the demise of the site.

3 Current Policy Context

The current Local Plan Proposals Map (1994, saved 1997) allocates the Site within the Green Belt. It is otherwise unallocated, but benefits from an established *sui generis* garden centre use, which is an employment generating use. The 'saved' policies of the Local Plan provide support for local businesses and 'saved' policy 19 (Overall Employment Strategy) sets out that the Council will encourage a range of employment uses in the District. The 'saved' employment policies also support the expansion of local firms, subject to compliance with other policies within the Plan.

The NPPF

The National Planning Policy Framework (NPPF) (February 2019) must be taken into account when drafting the emerging Local Plan. At Paragraph 11, the NPPF states that, for plan-making, local planning authorities (LPAs) should positively seek opportunities to meet the development needs of their area and prepare plans that meet objectively assessed need, with sufficient flexibility to adapt to rapid change.



Significant weight is afforded to the need for the planning system to support the delivery of sustainable homes and supporting businesses.

Housing Delivery

In terms of housing, the NPPF requires LPAs to make sufficient provision for (*inter alia*) housing, employment, retail, leisure and other commercial development, stating at paragraph 67 that draft policies should be deliverable:

“Planning policies should identify a supply of:

(a) Specific, deliverable sites for years one to five of the plan period

The NPPG advises that the policies within a Local Plan must be based on a clear and deliverable vision and ensure that the Local Plan vision for the area is realistic. The Governments Standard Method for calculating Housing Need (2020) found that the District requires 893 dwellings per annum (dpa). The West Hertfordshire Local Housing Needs Assessment (September 2020) recommended that the five districts within the Housing Market Area (HMA) should seek to deliver a minimum of 4,043 dwellings per annum across the South West Herts HMA, of which 893 dpa should be provided in St. Albans. However, the December 2020 Housing Delivery Test confirms that just 443 homes were delivered in 2019-2020 and just 1,493 delivered over the past three years.

It is clear that a step change in delivery is needed in the District and more deliverable housing sites need to be identified to accommodate sustainable housing developments. In the April 2020 letter from the withdrawn Local Plan Inspectors' to the Council, the Inspectors' found that the Council did not properly consider small scale sub areas identified in the 2013 Green Belt Review, but instead focussed on the release of strategic sites, with the capability of delivering over 500 homes to meet the Districts housing need. At Paragraph 37 of this letter, the Examiners state:

“This approach raises a number of concerns. As part of the fundamental approach stemming from 2013/14, smaller sites (less than 500 dwellings or 14ha) have been excluded from the Green Belt Review and site selection process. This includes the smaller scale areas of land identified in GB004 as contributing least to Green Belt purposes. Paragraph 8.1.5 of GB004 is clear that the small-scale sub areas identified in that study may not be exhaustive. It also recognises that it is possible that additional potential small-scale boundary changes that would also not compromise the overall function of the Green Belt might be identified through a more detailed survey. Thus, the capacity from such smaller sites could be much higher than that estimated by the Council”.

The Inspectors' clearly set out their concerns about the focus on release of strategic sites and disregard for suitable previously developed small scale sites which did not score particularly highly in the 2013 Green Belt Review. When commenting on the Council's approach of ruling out smaller sites, the Inspectors' concluded that:



“It is our view that this approach has ruled out an important potential source of housing that may have been found to have a lesser impact on the purposes of the Green Belt than the sites selected without sufficient justification”.

Although strategic sites can of course provide wider planning benefits, smaller sites can also be beneficial, providing a wider choice of homes than that provided by mass house builders on strategic sites. Importantly, smaller sites are generally more deliverable in the short to medium term.

The Inspectors’ also found that as a result of the site selection process, previously developed sites which are well served by public transport in the Green Belt but are below the size threshold have been discounted for consideration, regardless of the impact on Green Belt purposes. The Inspectors’ concluded that consideration should first be given to previously developed sites and/or those which are well served by public transport in the Green Belt, as set out in paragraph 138 of the Framework.

Previously developed sites, such as this site which is close to a built-up area and with limited constraints should therefore first be considered for Green Belt release to meet the District’s development needs.

4 Opportunity for Housing at Notcutt’s Garden Centre and surrounding Land

This Site (shown at Appendix 1) is free of constraints and is close to the town of Hatfield and the city of St Albans. It is surrounded by development, with established residential developments adjoining to the north-west, south, and west. The existing garden centre buildings form part of the eastern boundary of the Site and the Site is largely previously developed land. If the Site is released from the Green Belt, the garden centre will remain operational. In the past planning applications for minor development have been refused due to the impact on the openness of the Green Belt. Releasing the garden centre and the surrounding land from the Green Belt will ensure that the owner’s can carry out development to modernise their business without needing to overcome Green Belt restrictions on development. The 1.25 hectare field is available for a housing allocation.

Whilst the land beyond the eastern boundary is considered to be open countryside, this countryside functions as a gap between Hatfield and St. Albans, with the existing garden centre already forming the edge of this countryside land. The garden centre itself and the land around it, do not contribute to the gap between the settlements of Hatfield and St. Albans and forms a natural boundary with the open countryside to the east. Furthermore, the land to the east is in use as a quarry with further plans for extensions. The Site is therefore surrounded on all four side by development and has become a small infill site, ready for development.

In December 2013, an appeal (APP/B1930/A/13/2199820) allowed up to 22 dwellings on the land directly adjoining the Site to the north. In this decision, the Inspector found that the appeal site which was operated as a nursery was a *sui generis* use and therefore previously developed land. The proposed appropriate development of up to 22 residential (Class C3) units was therefore allowed as the proposals did not affect openness of the Green Belt. The Site is in a very similar situation and contains a *sui generis* garden centre which previously developed land.



The most suitable Green Belt sites to be considered positively for a release from the Green Belt and brought forward for development are most likely to be:

- those areas that have limited environmental constraints such as those that are at a lower risk of flooding or which have the potential for mitigation measures to be implemented to allow for them to be developed; and/or
- those sites or land parcels that score less strongly when assessed against the five key purposes of the Green Belt.

With regard to environmental constraints, there are no environmental constraints on the Site at Notcutts Garden Centre and the only constraint to development is its location within the Green Belt.

With regard to the Sites performance against the five key Purposes, the GB Review carried out by SKM in 2013 recommended 8 strategic parcels of land to be released to accommodate the District's development needs. The April 2020 letter from the Local Plan Inspectors, made it clear that this approach was not acceptable and that the suitability of previously developed sites should first be considered as well as small scale sites, which would have less impact on the Purposes of the Green Belt if they were developed.

The 2013 Green Belt Review places the site within parcel GB36, which uses Hatfield Road as its southern boundary. This parcel of land is larger than any other parcel in the GB Review and as a whole, was found to contribute to 3 of the 5 purposes. However, the GB Review acknowledges that the ribbon development along Hatfield Road, which includes the Site, makes it different to the rest of the area, stating on page 75:

“Existence of built development: The level of built development is low at 0.7%. There is evidence of ribbon development on the A1057 Hatfield Road at Smallford with commercial buildings, nurseries and the large development at the Oaklands campus”

The Site should be removed from the wider parcel GB36, given that it has a completely different context than the rest of the parcel and that it does not contribute to the five Purposes to the same extent as the remainder of the parcel. The table below shows the results when Parcel GB36, which includes the Site (situated on the southern edge) was measured against the five key purposes of the Green Belt. Our comments are set out in the right-hand column.

Table 1: Contribution of Parcel 36 to Purposes of Green Belt

No.	Purpose	Parcel GB 36 Review	The Site in isolation
1.	To check the unrestricted sprawl of large built-up areas.	No or limited contribution	<i>No contribution</i>



2.	To prevent neighbouring towns from merging.	Contributes to preventing the merging of St. Albans and Hatfield. There is development at Oaklands College and Smallford which affects the level of contribution.	<i>The development referred to at Smallford contains the Site. Further development here would not effect this Purpose.</i>
3.	To assist in safeguarding the countryside from encroachment.	Significant contribution due to rural characteristics	<i>The wider parcel has rural characteristics, however the Site is surrounded by development and is effectively an infill site.</i>
4.	To preserve the setting and special character of historic towns.	No contribution	<i>No contribution</i>
5.	To maintain the existing settlement pattern.	Contributes to separation of St. Albans and Sandridge,	<i>The Site is at the south east side of the parcel, whilst Sandridge is at the north western side. The Site does not contribute to the gap between these two towns.</i>

The wider parcel GB36 may contribute to the Green Belt, however, the Site itself is on a main road, surrounded by development and does not contain the same characteristics of the rest of the parcel 36. The Site does not contribute significantly to any of the five Purposes of the Green Belt. It should therefore be considered as a separate parcel of previously developed land, and suitable for release from the Green Belt.

The removal of this site from the Green Belt would result allow the existing business to grow and would also allow infill housing development on the remaining, currently undeveloped, land.

Benefits of releasing this site from the Green Belt include:

- Development of an underused, partially previously developed Site.
- Removing the garden centre from the Green Belt would help a local business to expand and modernise without needing to meet the current restriction due to its location in the Green Belt. This will result in the protection of existing and creation of additional local jobs.
- An allocation for housing can give the LPA more control over the type of development that is brought forward.



- This is a sustainable site with public transport links such as the regular bus services into Hatfield and St. Albans, with bus stops within walking distance and the existing services in Smallford a short walk from the site;
- The Site is not fully from Hatfield Road and Oaklands Lane. The effect on the openness of the Green Belt would therefore be minor.

Any future redevelopment of the Site at Notcutt's Garden Centre and adjoining land would allow retention of existing garden centre with an ability to make improvements. If the Site is released from the Green Belt, the existing employment generating business could therefore expand, creating more jobs and contributing to the local economy, whilst facilitating infill housing development.

5 Conclusion

This is a partly previously developed, infill site that is surrounded by development on all sides, directly adjacent to the services within Smallford, including public transport services. Developing out this site would be a natural completion to the existing development on the adjoining sites. There are retail, leisure, agricultural and employment uses within walking distance of the Site.

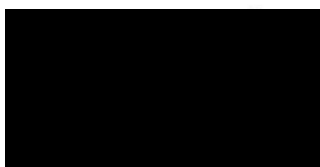
Our client intends to retain the existing garden centre use but the release of the Site from the Green Belt would allow the surrounding land to be developed for housing and would also allow the existing business to carry out minor development to modernise the existing garden centre, in order to meet its future operational needs and create more jobs.

The Site presents an opportunity to allocate previously developed land for residential development which can be delivered in the short term, making a meaningful contribution to housing need. The Site's location is sustainable and its removal from the Green Belt would not have a significant adverse impact on the five key purposes of the Green Belt.

We trust that the information contained in this letter sets out reasoned justification for the removal of the Site from the Green Belt and its allocation for development. We would be grateful if you would keep us informed of the progress of the documents in which this Call for Sites relates.

Should you have any questions or wish to discuss the future of this site, please do not hesitate to contact us.

Yours sincerely



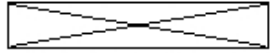
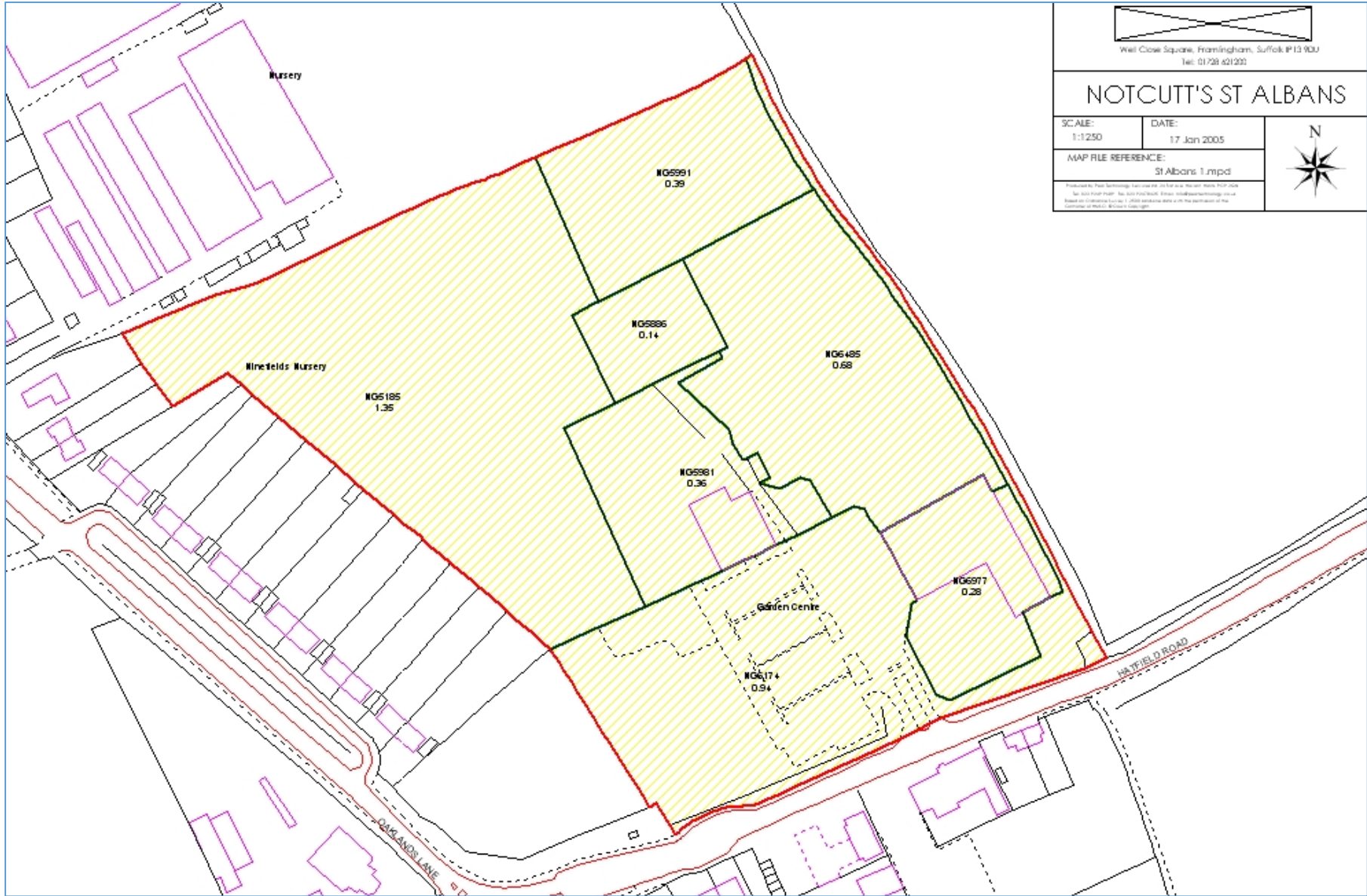
Angie Fenton
Director

cc. Notcutts Limited



APPENDIX 1

SITE PLAN



Well Close Square, Framingham, Suffolk IP13 9DU
Tel: 01728 621200

NOTCUTT'S ST ALBANS

SCALE:
1:1250

DATE:
17 Jan 2005

MAP FILE REFERENCE:
St Albans 1.mpd



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25 January to 5pm 8 March 2021
'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

Please do not submit sites that:

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

By online consultation portal:

<http://stalbans-consult.limehouse.co.uk/portal/>

By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

Your Details	
Name	Duncan Murdoch
Company/Organisation	Moult Walker Chartered Surveyors (acting for AIM Securities Limited)
Address	5 Bridge Street, Bishop's Stortford, Herts.
Postcode	CM23 2JU
Telephone	██████████
Email	██
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details			
Requirements:			
<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 			
Site address/location (Please provide a map showing the site boundary)	Roehyde Farm, Roestock Lane, Bullens Green, Hatfield, AL10 9AF		
Site area (in hectares)	18.8 hectares		
Coordinates	Easting	521 339	Northing 206 711
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Landownership (please include contact details if known)	<div style="background-color: black; width: 100%; height: 1em; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100%; height: 1em; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100%; height: 1em; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100%; height: 1em; margin-bottom: 2px;"></div>		
Current land use	Residential property (Roehyde Farmhouse) together with ancillary outbuildings. Vacant glasshouses and outbuildings.		
Condition of current use (e.g. vacant, derelict)	Current residential use (house and outbuildings). Vacant scrub land. Vacant glasshouses and outbuildings.		
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input checked="" type="checkbox"/> Mixed Use (please specify) <input checked="" type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify) Student housing and Extra-Care, Care and Sheltered Housing.		
Reasons for suggested development / land use	Existing residential use and access (plus further access options) and located opposite the University of Hertfordshire and has an underpass beneath the A1(M) motorway.		

Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years
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Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Preservation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Topography affecting site (land levels, slopes, ground conditions)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No Whilst the aerial photos show large areas as overgrown, this is mainly poor, unmanaged, low quality scrub growth and offers very limited value.
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history) The Site is Green Belt and has no recent planning history.	
Other comments	Please refer to attached Call for Sites submission document.	

Roehyde Farm, Roestock Lane, Bullens Green, Hatfield, AL10 9AF

