



**ST. ALBANS  
LOCAL PLAN REVIEW  
2020 – 2038**

**CALL FOR SITES**

**IN RESPECT OF**

**ROEHYDE, HATFIELD**

**MOULT WALKER CHARTERED SURVEYORS**

**8<sup>TH</sup> MARCH 2021**





Monday, 8 March 2021

Spatial Planning Team  
St Albans City and District Council  
Civic Centre  
St Peters Street  
St Albans  
AL1 3JE

Dear Sir/Madam

**St Albans City and District Council Local Plan 2020-2038 Update  
Call for Sites 2021  
Land at Roehyde Farm, Roestock Lane, Bullens Green, Hatfield, AL10 9AF  
Our Client – AIM Securities Limited**

Further to your email of 25<sup>th</sup> January 2021, we enclose our Call for Sites submission in respect of the above land at Roehyde Farm, Hatfield.

This report provides further supporting information on a variety of land use, planning and development considerations in support of this site.

Should you require any further information, please do not hesitate to contact us.

Yours faithfully

[REDACTED]  
**Duncan Murdoch BSc (Hons) MRICS**  
Director  
Moult Walker Chartered Surveyors

Enc.

## 1. INTRODUCTION

- 1.1 Moulton Walker are instructed by AIM Securities Limited ('AIM') to promote the land at Roehyde Farm, Roestock Lane, Bullens Green, Hatfield, AL10 9AF (the 'Site') for development. Further to the withdrawal of the 2018 draft Local Plan, this report and submission are a response to the 'call for Sites' exercise being undertaken by St Albans City and District Council (the 'Council').
- 1.2 This latest submission is in addition to the earlier representations made by both Moulton Walker and Maddox Planning relating to the Site. The Site has been promoted for strategic employment use for several years. This latest submission seeks to add a residential use element to promote a mixed use scheme either for development in isolation or as part of an overall larger scheme including the neighbouring land to the north.

## 2. CURRENT USE AND DESCRIPTION

### Location

- 2.1 The Site is located to the southwest of Hatfield, and northeast of Colney Heath adjacent to the A1(M) motorway to the south west of Hatfield and within close walking distance (via an existing underpass) to the University of Hertfordshire and the Bishop's Rise housing area.
- 2.2 It shares a strategic location with the neighbouring northern land to the major A414-A1(M) highway junction (and has a direct access thereto), together with local public transport opportunities along the A414 corridor. It is part brownfield and is fully serviced

### Description & Access

- 2.3 The Site extends to circa 18.8 hectares and comprises mainly overgrown scrub land, a residential property (Roehyde farmhouse) together with various outbuildings, vacant glasshouses and buildings and an unmanaged woodland area.



- 2.4 The majority of the overground scrub is low quality and has grown unmanaged and offers poor quality planting.
- 2.5 The Site has the benefit of two existing access points. Firstly, an exit only to the A1(M) northbound exit slip road (photo below) and an existing access road to Bullens Green Lane which in turn access Roestock Lane at nearby Bullens Green.



- 2.6 The Site has the benefit of a Lands Tribunal Award estopping any highways policy objection to a new additional access direct from the A414. There is an existing cycleway underpass to the A1(M) connecting the Roehyde site to Hatfield and the University.
- 2.7 The Site has previously been granted planning permission for a new access road to the A414 to the north west, reference S6/0465/93/FP.
- 2.8 The Site is regarded as:
- close to railway stations (circa 2.8km from Hatfield and 2.5km from Welham Green) and easily accessible by road (directly adjacent to Junction 3 of the A1(M)),
  - served by local bus services;
  - adjacent to an existing settlement boundary (Hatfield) and would not result in coalescence between settlements, and;
  - well related to existing local amenities.
- 2.9 A 2km walking analysis from the centre of the Site and the local facilities that are available within this area confirms there is an Aldi supermarket and Galleria Shopping Centre (which has fast food chains, a coffee shop, a number of retail units and a pharmacy). The College Lane University Campus is also located within the 2km catchment.
- 2.10 A segregated pedestrian/cycle link is provided along College Lane and Roehyde Way, extending south to a pedestrian subway under the A1(M) and to Bullens Green Lane. Roehyde Way enables access to the University of Hertfordshire Campus via a dedicated pedestrian access to the north, and to the residential areas to the east of the site.



- 2.11 A shared use pedestrian/ cycleway is provided along the west side of the A414 which connects with Comet Way at the A1(M)/ A414 interchange and then continues north to Cavendish Way, providing access to Hatfield Business Park, the de Havilland University Campus and residential areas to the north of the site.

### Flooding

- 2.12 The Site is identified as Flood Zone 1.

## 3. **PREVIOUS PLANNING REPRESENTATIONS**

- 3.1 The Site has previously been promoted by both Moulton Walker and Maddox Planning as a strategic employment site, in association with Goodmans as promoter and developer. This included the Cemex land to the north east in the promotion area.
- 3.2 Such representations were for the release of the Site from the Green Belt and development of a mixed science and logistics park delivering 80,000 sqm to 100,000 sqm floorspace.
- 3.3 The previous proposed land uses reflected the priority sectors in the LEP's Strategic Economic Plan, included:
- biosciences;
  - pharmaceutical;
  - advanced engineering;
  - knowledge hub linked to a local Higher Education provider (ideally the University of Hertfordshire), and;
  - high quality logistics.
- 3.4 The previous layout concept was that of a medium density science park, which allows delivery of high quality landscaping. A knowledge village links the concept to the University of Hertfordshire, which occupies the site to the northeast, accessed via an underpass to the A1(M) near the southeast corner of the Site.
- 3.5 Prior to this, the Site was identified by the NHS as a potential new hospital location in 2004 - 2005.
- 3.6 The neighbouring land to the north was previously identified in the Hertfordshire County Council Waste Site Allocations Local Plan (2014) as site for waste management purposes. This has since been withdrawn.

## 4. **PROPOSED DEVELOPMENT (2021 CALL FOR SITES)**

- 4.1 The Site is proposed by this current Call for Sites consultation for a residential led mixed use development including the previous employment proposals for a science park, knowledge hub with emphasis on biosciences, pharmaceutical and advanced engineering.
- 4.2 In addition, there is clear potential for an additional residential element which could include traditional residential housing, student accommodation, extra car, care and sheltered housing.
- 4.3 The variety of residential outbuildings, vacant glasshouses and associated buildings offer potential for residential led development adjacent to the existing farmhouse.

Monday, 8 March 2021



**Roehde Farm, Roestock Lane, Bullens Green, Hatfield, AL10 9AF**



**Roehde Farm, Roestock Lane, Bullens Green, Hatfield, AL10 9AF**





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



**HERTFORDSHIRE COUNTY COUNCIL  
PROPERTY (PROPERTY PLANNING TEAM)**

**ST ALBANS CITY AND DISTRICT COUNCIL**

**SUBMISSION TO CALL FOR SITES CONSULTATION**

**ON BEHALF AS HERTFORDSHIRE COUNTY COUNCIL AS  
LANDOWNER**

**March 2021**

## **1.0 Introduction**

- 1.1 This document is submitted by Hertfordshire County Council (HCC) Property (Property Planning Team) in response to the St Albans City and District Council Call for Sites consultation.

## **2.0 Identified Sites in HCC Ownership**

- 2.1 A total of 10 sites in the ownership of the County Council have been identified for submission to the District Council's Call for Sites. These are:

- Rural Estate land south of Napsbury (Land West of London Colney)
- Rural Estate land north of Napsbury
- Land East of Kay Walk, St Albans
- Land at Stephens Way and Flamsteadbury Lane Redbourn
- Rural Estate land at Waterdell, adj to Mount Pleasant JMI
- Rural estate land at Highfield Farm, Tyttenhanger
- Carpenter's Nursery, Sandridge
- Former Radlett Aerodrome, Radlett
- Smallford Farm and Smallford Pit, Smallford
- Former Ariston Works, Harpenden Road, St Albans

- 2.2 The forms previously submitted in September 2017 have been updated with an additional form included for the former Ariston Site.

## **2.0 Conclusion**

- 3.1 HCC Property welcomes the opportunity to participate in the Call for Sites consultation. Further information can be provided on any of the submitted sites by contacting the Property Planning Team.

## Smallford Farm and Smallford Pit, Smallford

**Site address:** Please provide a brief description e.g. land to the south west of (settlement), between the A500 and railway.

Smallford Farm and Smallford Pit are located to the north and south of Colney Heath Lane.

**Ownership details:** Please indicate whether freehold or leasehold and length of lease (it is possible that a site may be in multiple ownership).

Freehold.

**Area of site** (hectares)

Smallford Farm is approximately 18ha;  
Smallford Pit is approximately 55ha.

**Current use(s)**

Smallford Farm is in agricultural use and includes farm buildings.  
Smallford Pit is a former landfill site and gravel pit.

**Are there any factors that could make the site unavailable for development?** (Please provide any details in the boxes labelled a to d below)

**a. Ownership Constraints** (e.g. multiple ownerships, ransom strips, tenancies, operational requirements)

Smallford Farm is part of the HCC Rural Estate.

**b. Awaiting relocation of current use**

n/a

**c. Level of developer interest** (i.e. low, medium, high)

n/a

**d. Likely timeframe for development (i.e. completion).** Please indicate if you anticipate that development may be split over different time periods.

**Likely timescale for delivery of suggested development / land use**

Solar Farm 1 to 5 years. Other uses 5+ years

**Are you aware of any particular constraints that might make the site unsuitable for development?** (Please provide any details in the boxes labelled a to d below)

**a. Environmental Constraints** e.g. floodplain, Sites of Special Scientific Interest (SSSIs) or Local Nature Reserve, sites of geological importance.

Part of the Smallford Pit site falls within Floodzone 2/3.

**b. Other Designations** e.g. Conservation Area, Listed Buildings, Archaeological Sites.

n/a

**c. Physical Constraints** e.g. poor access, steep slopes, uneven terrain, ground contamination, Tree Preservation Orders

Smallford Pit is a former landfill site.

**d. Policy Constraints** e.g. Green Belt, Landscape Character Area, high quality agricultural land, designated employment area, public or private green space, site with social or community value.

Green Belt, Landscape Development Area

**If any constraints have been identified above, do you think that they could be overcome? If so, how?**

Smallford Pit is a former landfill site where remediation would be required. Indications are that onsite remediation has the potential to provide a build area on 50% of the site. The identified environmental constraint of part of the site lying within a flood zone can be mitigated by appropriate land use, together with good design and layout in any development scheme.

**What is the estimated number of dwellings that could be provided on the site?**

At 30 to 40 dwellings per hectare the Smallford Farm site could provide between 500 and 700 dwellings.

Sketch scheme (submitted for information if necessary)

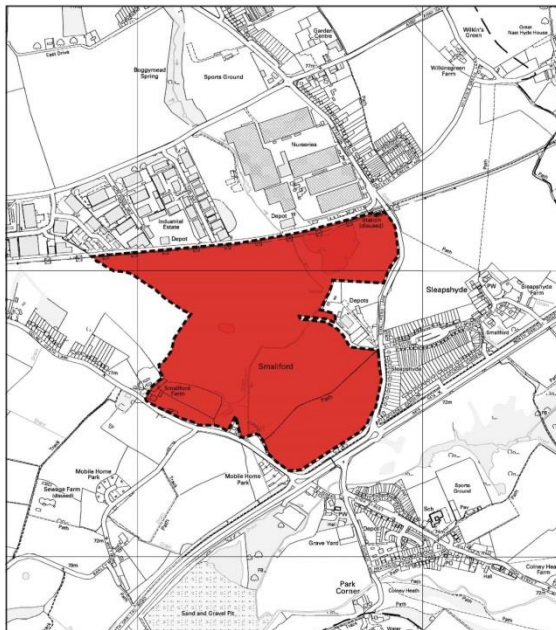
Yes/ No

Is there any other information that you would like to provide in relation to your proposed site?  
If yes, please give details below (and attach if necessary)

This site has been submitted previously.



Smallford Farm



PROJECT TITLE	SCALE	DATE	CHECKED
Smallford Pit ST ALBANS	1:10000	AUGUST 2007	
		DRAWN	DATE
		HP	
DRAWING TITLE	PROJECT No.	030	
Site location plan	4695		

**VINCENT AND GORBING**  
 CHARTERED ARCHITECTS AND TOWN PLANNERS  
 STERLING COURT NORTON ROAD STEVENAGE HERTS  
 TELEPHONE: 01438 316331 FAX: 01438 722035

Smallford Pit

**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](mailto: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.

<b>Your Details</b>	
Name	Georgina Holden
Company/Organisation	Divine Ideas
Address	115 Bulwer Road,London
Postcode	E11 1BU
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

<b>Site Details</b>			
<b>Requirements:</b>			
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>			
Site address/location (Please provide a map showing the site boundary)	Smallford Stables, 187 Colney Heath Lane, St Albans AL4 0TP		
Site area (in hectares)	2.75ha		
Coordinates	Easting	519072	Northing 206600
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: 5px;"></div> <div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 5px;"></div>		
Current land use	Part residential with stables and part vacant open land/ fields		
Condition of current use (e.g. vacant, derelict)			
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	A residential led development of the proposal site to achieve a 70 homes at a density of 30 dwellings/ha with regard to the listed building and setting. This is suitable in terms of neighbouring uses and the development of the site will not be of a scale / nature large enough to significantly change the size and character of the settlement of St Albans.		



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 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  Grade II listed Smallford Cottage  Metropolitan Green Belt: Strategic Parcel 35 identified in Green Belt review  County Wildlife Site 68/003  Colney Heath Farmland – Area 30. Heath habitat with medium-scaled arable farmland and urban development
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  Please include details of the above choice below (for example planning reference numbers and site history)	
Other comments	The site meets the Green Belt sites assessment criteria insofar as it would not contribute to <ul style="list-style-type: none"> <li>• merging of towns; and</li> <li>• would not be of a scale / nature large enough to significantly change the size and character of the settlement of St Albans</li> </ul>	



0 20 40 60 80 100m

— Site Boundary

OS Location Plan

One Chapel Place  
London  
W1G 0BG  
T: 020 7518 3200

**By email only:** [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

Spatial Planning Team  
St Albans and City District Council  
Civic Centre  
St Peters Street  
St Albans  
Hertfordshire  
AL1 3JE

02 March 2021

Dear Sir/Madam

## **ST ALBANS NEW LOCAL PLAN 2020-2038 – SUSTAINABILITY APPRAISAL, LOCAL DEVELOPMENT SCHEME AND CALL FOR SITES**

On behalf of our client, Stackbourne Ltd, we enclose representations in response to the recently published information and engagement supporting the new Local Plan 2020-2038. This letter specifically considers the Local Development Scheme and Sustainability Appraisal (SA) Scoping Report (both January 2021). A 'Call for Sites' exercise has also opened, to which a response has also been submitted.

Stackbourne Ltd is the freehold owner of Smallford Works, Smallford Lane, St Albans, AL4 0SA. The exact land ownership is enclosed at Appendix A. We also attach a completed HELAA submission form at Appendix B.

### **Background**

Stackbourne Ltd has actively promoted Smallford Works for residential development in previous iterations of the plan-making process – including the recently withdrawn Local Plan 2020-2036.

Despite the Council's claims that the best use of previously developed land formed part of its Spatial Strategy at examination, the Smallford Works site was excluded from allocation due to an unfounded decision to focus predominantly on strategic sites capable of delivering approximately 500 dwellings and/or 14ha of developable land. This is something our client actively opposed during the examination.

In light of the above, an outline planning application (Ref: 5/2019/3022) was submitted in July 2019 for up to 100 dwellings on the site. However, this was refused in July 2020 by the Planning Referrals Committee upon recommendation of the Case Officer.

Our client has appealed this decision (Ref: APP/B1930/W/20/3260479) and a virtual inquiry is scheduled to take place from Tuesday 16<sup>th</sup> – Thursday 18<sup>th</sup> March 2021.

### **Local Development Scheme**

An updated Local Development Scheme (LDS) was published in January 2021, setting out the timetable for the production of the Local Plan 2020-2038.

We welcome the Council's decision to conduct a new Green Belt assessment. As recognised by the Council's officers<sup>1</sup>, the previous Green Belt assessment was produced in line with the 2012 version of the NPPF and as such, did not include particular references to giving *'first consideration to land which is previously-developed'* – something that was introduced to Paragraph 138 in the 2018 version and has been retained in the current 2019 version.

Whilst the LDS indicates that the Local Plan would be adopted by December 2023, this appears to contain some unrealistic assumptions in regard of timescales. For example, the Council assume that the process from submission to adoption of the Plan would take only 6 months. We are concerned that the Council will not meet this target, and as such, could be subject to Government intervention.

### **Sustainability Appraisal**

Whilst we generally support the principle of the Sustainability Objectives (SOs) set out at Table 5.2 of the Scoping Report, we take the opportunity to explore, emphasise and evaluate three specific areas in which the Council must focus – particularly in light of the critique of the Inspector's at the Examination of the recently withdrawn Local Plan.

#### Housing Provision (including Affordable Housing)

Chapter 5 of the NPPF seeks to support the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed.

The baseline housing evidence at Appendix A of the Scoping Report emphasises both the extent and impact of insufficient housing delivery in St Albans over the last 20 years. As a direct result of not adequately planning for the homes they need, the Council are left with just 2.5 years five-year housing land supply (5YHLS). Further, and of particular relevance to a District that is amongst the most unaffordable outside of London, just 17.2% of the 2,182 completions in the last five years (2015/16 – 2019/20) have been affordable dwellings. This is also only significantly beneath the Council's own adopted target of 35%.

The Council are correct to identify a Local Housing Need (LHN) of 893 dpa for a plan period 2020-2038, in line with the recent revisions to the Standard Methodology.<sup>2</sup> In light of the above, it is imperative that the Council work proactively to address this long-standing issue.

It is in this context we raise concern with the language of the Council's inferred approach to meeting its housing requirements at Paragraph A8.4:

*"The new Local Plan will therefore need to identify ways to limit new housing growth to the minimum possible and prioritise ways in which land can be released to protect best and most versatile land, land with mineral resource potential and land with ecological and landscape value".*

Planning Practice Guidance (PPG) is clear that the Standard Methodology calculation provides a LHN that should be taken as a minimum figure.<sup>3</sup> This assessment should be completed independently from assessing land availability, establishing a housing requirement figure, and preparing policies to address this (e.g. site allocations).<sup>4</sup> An assessment of land availability is designed to identify a future supply of land which is suitable, available, and achievable over the plan-period – in the context of defined constraints.

---

<sup>1</sup> Printed Minutes of Planning Policy Committee Meeting on 9<sup>th</sup> June 2020 (pg. 3)

<sup>2</sup> Paragraph 004 (Reference ID: 2a-004-20201216)

<sup>3</sup> Paragraph 002 (Reference ID: 2a-002-20190220)

<sup>4</sup> Paragraph 001 (Reference ID: 2a-001-20190220)

Whilst it is important to recognise the conflict development has on other aspects, such as landscape/visual and environmental impact, we would expect the Council to take a clear, evidenced, and justified approach to the balance of these conflicts within the realms of national planning policy and its guidance. We suggest the wording of Paragraph A8.4 may indicate otherwise.

### Previously Developed Land

SO14 sets an aim to “*prioritise locating new development on previously developed land first*”.

We fully agree with this approach, which supports Government has continuously emphasised the need of local planning authorities to prioritise the delivery, and maximise the potential, of PDL in advance of greenfield sites. This is set out in both White Papers<sup>5</sup> and the Framework itself.<sup>6</sup>

Paragraph 137-138 particularly highlights PDL as a priority when proposing to amend Green Belt boundaries. As highlighted above, the previous Green Belt Assessment was not completed with reference to this consideration, and subsequently condemned in the Inspector’s post-hearings letter.<sup>7</sup> Indeed, officers have confirmed that proposed development at Smallford Works itself is “*one of a small number of additional PDL sites [...] that may be approached differently*” under a new Green Belt Assessment.

We agree with this observation and consider that the delivery of Smallford Works for residential development would represent an efficient and appropriate use of previously developed land within the Green Belt, that would contribute to much needed market and affordable housing within the District.

### Site Selection

The Inspectors were critical of the Council’s approach to site selection agreed at the May 2018 meeting of the Planning Policy Committee – namely by choosing to allocate 8 strategic sites within the parameters of providing a minimum of 500 dwellings or 14 hectares (ha) of developable land.<sup>8</sup> As they state, minimal flexibility and an out-dated Green Belt Assessment disregarded multiple sites – including Smallford Works – from inclusion within the Plan, despite many warranting further investigations.

We would expect the Council to avoid such an arbitrary approach in the production of this Plan, and to use the SA to refine and guide a more suitable approach to site selection.

### **Conclusion**

In summary, whilst we broadly support the objectives and aims set out in the SA, we have taken the opportunity to emphasise three key elements of the recently withdrawn Local Plan which the Council should seek to rectify in the production of the Local Plan 2020-2038.

We support the Council’s decision to undertake a new Green Belt assessment, to be produced in line with the most up-to-date requirements of the NPPF. However, we expect the Council to take a more detailed approach to its site selection, influenced by the key objectives of the SA – including the prioritisation of previously developed land. Most importantly, we urge the Council to work proactively to address a dire shortage of both market and affordable housing that has unearthed from decades of improper plan-making.

I trust the comments we provide are useful, but should you have any queries, please do not hesitate to contact me. I would appreciate if you would keep me informed as to the progression of the Local Plan 2020-2038, including any subsequent stages of consultation.

---

<sup>5</sup> *Fixing our broken housing market* (February 2017) and *Planning for the Future* (August 2020)

<sup>6</sup> See Paragraph 84, 117, 118, 119

<sup>7</sup> Paragraph 48

<sup>8</sup> See Paragraph 33-34 if the Inspectors Report

Yours sincerely,

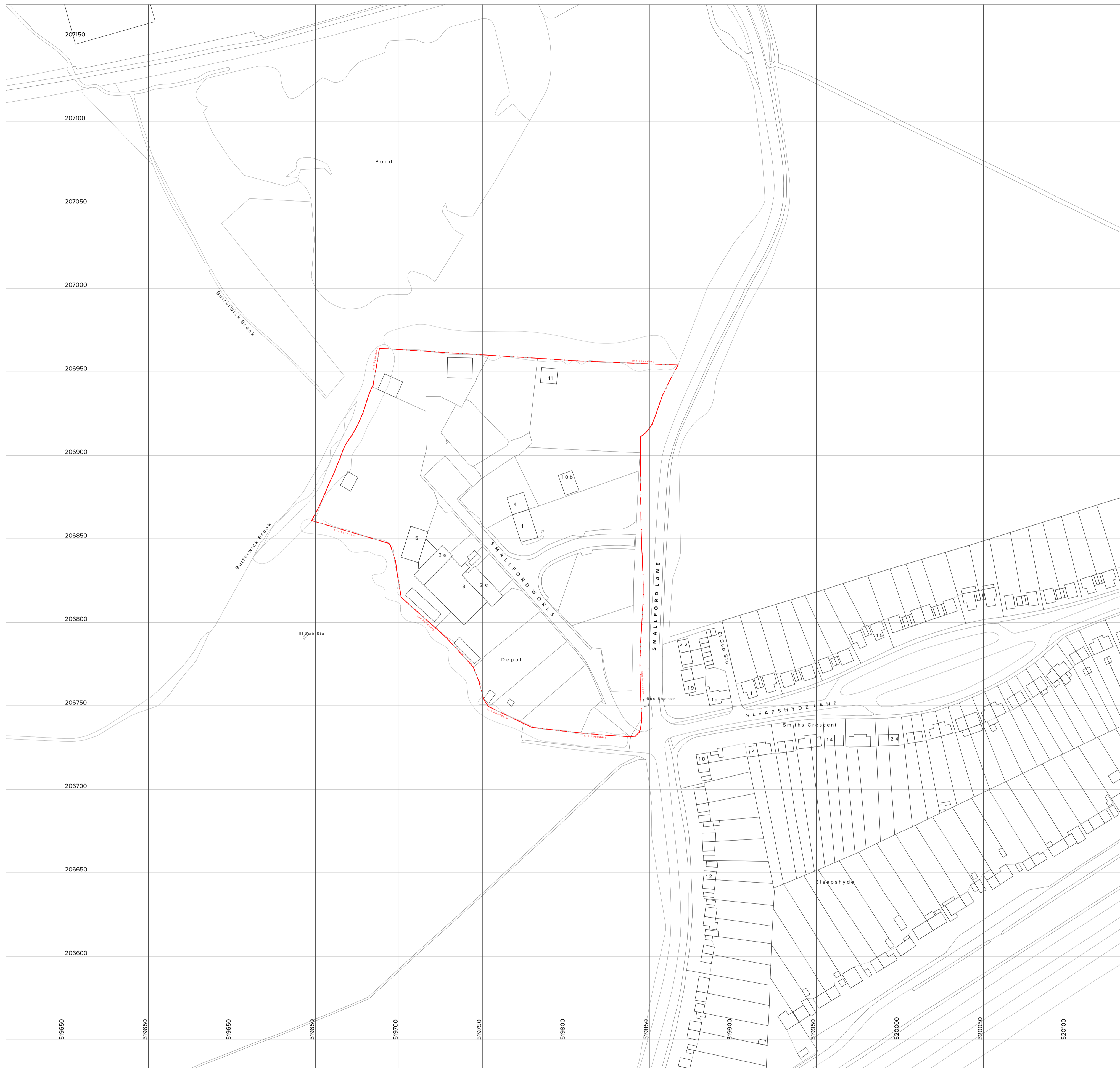


**David Churchill**  
Partner

E: [Redacted]  
T: [Redacted]

Appendix A: Site Location Plan





Location Plan  
1:1250

NOTES  
THIS DRAWING IS COPYRIGHT © OF TURNER. NO REPRODUCTION WITHOUT PERMISSION. UNLESS NOTED OTHERWISE THIS DRAWING IS NOT FOR CONSTRUCTION. ALL DIMENSIONS AND LEVELS ARE TO BE CHECKED ON SITE PRIOR TO THE COMMENCEMENT OF WORK. REPORT ANY DISCREPANCIES FOR CLARIFICATION BEFORE PROCEEDING WITH WORK. CHANGING ARE NOT TO BE SCALED. USE ONLY FIGURED DIMENSIONS. REFER TO CONSULTANT DOCUMENTATION FOR FURTHER INFORMATION.  
Areas and apartment numbers have been calculated in accordance with the NCS355A Code of Measuring Practice (B1) edition 2015 using the appropriate MA, CA, CAI, GFA and GFA methods as set out in the code. All areas are made on the basis of these procedures, whether as to project safety, pre-letting, lease agreements, completion and so on. It should not be taken as a guarantee for calculation arising from the Building, design development, accurate site survey, site levels and site dimensions, construction method and building behaviour, Local Authority and Statutory consents.

Key Plan / Scale Bar

Rev	Issue Date	Checked	Status	Reason for Issue
A	05/11/2019	GC	A2	Issued for Listed Building Consent

Rev	Issue Date	Checked	Status	Reason for Issue

Client  
**Stackbourne Ltd.**  
Stackbourne Ltd, Merritt House, Hill Avenue,  
Amersham, Bucks, HP6 5BQ

Project Title  
**Smallford Works**  
Smallford Works, Smallford Lane, St Albans,  
Hertfordshire AL4 0SA UK

Drawing Title  
**Location Plan**  
Status Code  
A2  
Drawing Purpose  
For Planning

Scale  
1:1250 @A1, 50% @A3  
Project No.  
17206  
Drawing Number  
17206-TUR-00-00-DR-A  
drawing number  
02100  
rev  
A  
Originator  
**TURNER**

39 Stamford Street  
South Bank, Central  
London SE1 1LQ

T +44 (0)20 3001 1575  
www.turner.co.uk

**Appendix B: Completed HELAA Form**

**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](mailto: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.

<b>Your Details</b>	
Name	Jamie Stanley
Company/Organisation	Carter Jonas
Address	One Chapel Place London
Postcode	W1G 0BG
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

<b>Site Details</b>			
<b>Requirements:</b>			
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>			
Site address/location (Please provide a map showing the site boundary)	Smallford Works Smallford Lane Smallford St Albans AL4 0SA		
Site area (in hectares)	3.5 ha		
Coordinates	Easting	519767	Northing 206863
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)	[REDACTED]		
Current land use	A mix of industrial storage units.		
Condition of current use (e.g. vacant, derelict)	Occupied		
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	Appropriate re-use of previously developed land within the Green Belt to deliver much-needed housing in St Albans. The site should be prioritised for redevelopment in line with the principles of paragraph 137 of the NPPF and as supported by the examining Inspectors to the recently withdrawn Local Plan.		

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 checked="" type="checkbox"/> Yes  <i>However evidence has been produced and solution available to remediate.</i>  <input 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 type="checkbox"/> Yes <input checked="" 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).  <i>New improved primary vehicular access off Smallford Lane with a new right turn and informal pedestrian crossing in road delivered as part of an earlier planning permission Ref: 5/2002/2112).</i>
	Other constraints affecting the site	<input checked="" type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No  <i>Green Belt – although previously developed land.</i>

<p>Planning Status</p>	<p> <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 checked="" type="checkbox"/> Other </p> <hr/> <p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p><i>Ongoing appeal (APP/B1930/W/20/3260479) against the decision of the Council to refuse Outline Permission (Ref: 5/2019/3022) for the following:</i></p> <p><i>“Outline planning permission with all matters reserved, except access, for the redevelopment of site including demolition of existing buildings to provide up to 100 residential units”</i></p> <p><i>Inquiry being held in mid-March 2021.</i></p>
<p>Other comments</p>	



## **St Albans Draft Local Plan 2020 - 2038**

### **Land at The Dak, Colney Heath Lane**

St Albans Call for Sites response 2021

Planning Report on behalf of Mr T Loy

DLA Ref: 98/145  
February 2021



## CONTENTS

1.0	INTRODUCTION .....	1
2.0	SITE & CONTEXT ANALYSIS.....	2
3.0	STRATEGIC CONTEXT .....	4
4.0	PLANNING HISTORY.....	6
5.0	PREVIOUS SHLAA ASSESSMENT .....	7
6.0	SITE CONSTRAINTS .....	8
7.0	OUTLINE OF PROPOSAL.....	9
8.0	GREEN BELT IMPACT .....	11
9.0	CONCLUSIONS .....	14

## 1.0 INTRODUCTION

1.1 This report is submitted in response to the Call for Sites on behalf of the owner of the land north of Colney Heath Road at 'The Dak'. The site is being promoted for residential development.

1.2 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.

1.3 St Albans is the largest town in the district and is clearly a sustainable location for growth. The report site is well located in relation to key services and facilities and is within walking distance of schools, shops, health and leisure facilities. It lies around 200m from a bus stop and 3.3km from the railway station.

1.4 Having established that Green Belt releases will be necessary, Government policy requires that first consideration be given to sites that have been previously developed and/or are well-served by public transport. This site is considered to meet both of these requirements.

1.5 The site has built development to the north, east, and west with a road along the southern boundary. Given the pattern of existing development, the site will not extend the built envelope of St Albans any closer to neighbouring settlements so will not cause coalescence in any form.

1.6 There are no constraints that would prevent development.

1.7 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.

1.8 The site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.

## 2.0 SITE & CONTEXT ANALYSIS

### 2.1 Location

The site, shown in Figure 1 below is located, is situated on the eastern edge of the town of St Albans as defined by the Local Plan Review, some 3.5km to the east of the city centre. The site is located on the north of Colney Heath Lane, a road that links the village of Colney Heath to the south east of St Albans.



Figure 1 - Site location

### 2.2 Context and land uses

The broadly rectangular and essentially level site comprises a large two-storey house, with associated outbuildings and land. The primary use along this part of Colney Heath Lane is residential.

### 2.3 Access

The existing access to the site is from Colney Heath Lane, situated to the south of the site. This is shown in Figure 2 below.



Figure 2 - Site access

## 2.4 Development Plan Notation

The proposals map of the St Albans District Local Plan Review 1994 shows the Site within the Metropolitan Green Belt (MGB), within 50m to the urban area of St Albans. The site is not subject to any other designation or at risk from flooding.

## 2.5 Local services

The site enjoys excellent access to a range of local services and facilities. As detailed below, the majority of these services are located within 2km of the site.

**Table 2.6:** Summary of Local Services (approximate measurements)

Facility	Local Provision	Proximity to site (km)
<b>Education</b>	Oakwood Primary School	1900m
	Nicolas Breakspear School	275m
	Oaklands College	1400m
<b>Retail</b>	Alban Park Industrial Estate	1600m
	Knoll Park Industrial Estate	1700m
	Hatfield Road (range of shops)	1900m
<b>Health</b>	Jhoots Pharmacy	1600m
	Highfield Surgery	1600m
	Lambourn Grove Assessment Unit	950m
<b>Leisure</b>	YMCA Community Gym	1600m
	Longacres Park	1100m
	Colney Heath Football Club	1700m

## 2.6 Public Transport

The nearest bus stop is located some 200m to the west at the outside Nicholas Breakspear School.

St Albans Railway Station is located some 3.3km to the west of the Report Site, providing frequent services to St Pancras International, Gatwick Airport and Brighton to the south and Luton Airport, Luton and Bedford to the north.

## 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 33<sup>rd</sup> 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.

### **The portfolio of housing sites**

- 3.6 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.
- 3.7 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**

- 3.8 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.

### **Previously developed land**

- 3.9 Government policy in the NPPF includes a positive framework for the redevelopment of previously developed land. Specifically in relation to Green Belt sites, paragraph 138 states:

*“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.”*

- 3.10 This priority given to previously developed sites will need to be reflected in the Council's methodology for reviewing Green Belt boundaries. Clearly, a poorly located brownfield site should not automatically be allocated but where brownfield sites are well-located and well served by public transport, they should be allocated.

## 4.0 PLANNING HISTORY

### 4.1 Site

The table below shows the relevant planning history for this site.

**Table 4.1:** Planning history for site

LPA Reference	Proposal	Decision
5/1980/0420	Extension to side of house.	Approved
5/2011/1184	Outline application (access and layout) for the erection of thirteen houses following demolition of existing dwelling	Refused – Appeal Dismissed
5/2014/0239	Outline application (access) - Erection of ten houses following demolition of existing	Refused
5/2014/1998	Certificate of Lawfulness (proposed) - Two storey front and rear extensions	Refused
5/2014/3248	Certificate of Lawfulness (proposed) - Two storey front and rear extensions (resubmission following refusal of 5/2014/1998)	Withdrawn

## 5.0 PREVIOUS SHLAA ASSESSMENT

- 5.1.1 This site has been submitted through previous Call for Sites invitations and was assessed in the 2016 SHLAA under the reference no. SHLAA-GB-SA-245. At that stage the Council shortlisted the site as having development potential.
- 5.1.2 The 2016 conclusion follows the Council's conclusions in the 2009 SHLAA, which included a more detailed analysis of the site. The site was considered to have potential for release alongside the adjoining land to the west, to the north of Boissy Close, in order to create a more robust long-term Green Belt boundary.
- 5.1.3 The Dak site itself measures 1.18ha and the Council concluded the following in respect of development capacity:

*“Assuming the single dwelling is removed and the overall site was available for housing, with a mix of dwelling types appropriate to the area (principally two and three storey family housing, including semidetached and townhouses). Substantial tree screening, especially in the north-west corner, where the Alban Way adjoins, will need to be retained and may slightly reduce overall capacity. Approximately 35 dwellings per hectare is a reasonable estimate, on approximately 1.1 hectares of overall site, in Zone 6.”*



## 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. There are TPO trees adjacent to the site, however these would remain unaffected.

### 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 Colney Heath Lane to which a connection could easily be made.

### 6.7 **Legal issues**

The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present.

### 6.8 **Access**

The proposed site layout shows that access can be achieved off the public highway from Colney Heath Lane.

## 7.0 OUTLINE OF PROPOSAL

7.1 The site is suitable for residential development. Two alternative forms of development are set out below – one relating the whole site and one just including the area between the existing dwellings.



Figure 3 - Option A layout

### Option A

7.2 Option A includes the whole 1.18ha site (see Figure 3) and assumes a density of around 35dph, yielding a total of around 40 dwellings. While this option could be brought forward in isolation, it could also be considered alongside development of land to the west of the site, as suggested in the Council's SHLAA assessment from 2009. This option is considered to make best use of the site.

### Option B

7.2 Option B proposes a more limited development on the area located between numbers 101 and 113 Colney Heath Lane (see Figure 4 below). The gap between the dwellings is around 60m wide at the site frontage and the proposed development area extends around 65m into the site.

7.3 Using a similar density to option A, Option B delivers around 13 homes. Although this option would deliver fewer dwellings, it would also have less impact on the Green Belt and could be considered in isolation from any development potential of adjoining plots.



Figure 4 – Option B layout

- 7.1.3 There are no designations that would prevent development of the site. There are protected trees to the east of the site, however these would be unaffected by the proposals.
- 7.1.4 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.

## 8.0 GREEN BELT IMPACT

8.1.0 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.

### 8.2.0 **Purpose 1 - to check the unrestricted sprawl of large built-up areas**

Development of the site would represent the infilling in the otherwise built-up frontage on Colney Heath Lane. As can be seen from Figures 1 and 2 above, there is a line of suburban-style dwellings along Colney Heath Lane leading away from St Albans for a distance of over 300m. On this basis, consolidating development along this frontage would not represent "unrestricted sprawl" and would not extend the built envelope of St Albans.

### 8.3.0 **Purpose 2 – to prevent neighbouring towns merging into one another.**

The nearest town to the east of St Albans is Hatfield. While the development site does fall between St Albans and Hatfield, the nature of the site as a break in an otherwise built frontage means the contribution to preventing coalescence is extremely limited.

### 8.4.0 **Purpose 3 – to assist in safeguarding the countryside from encroachment.**

The Site constitutes previously developed land in line with the definition in the NPPF as it is the curtilage of a dwelling not within a built-up area (it is located within the Green Belt). As such, the development of the site would not result in the loss of countryside and the site therefore makes no contribution to this purpose.

### 8.5.0 **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.

### 8.6.0 **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.

### 8.7.0 **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:

- The site constitutes previously developed land and would therefore not lead to the loss of countryside.
- The site is located in a built-up residential frontage and as such would not constitute urban sprawl.

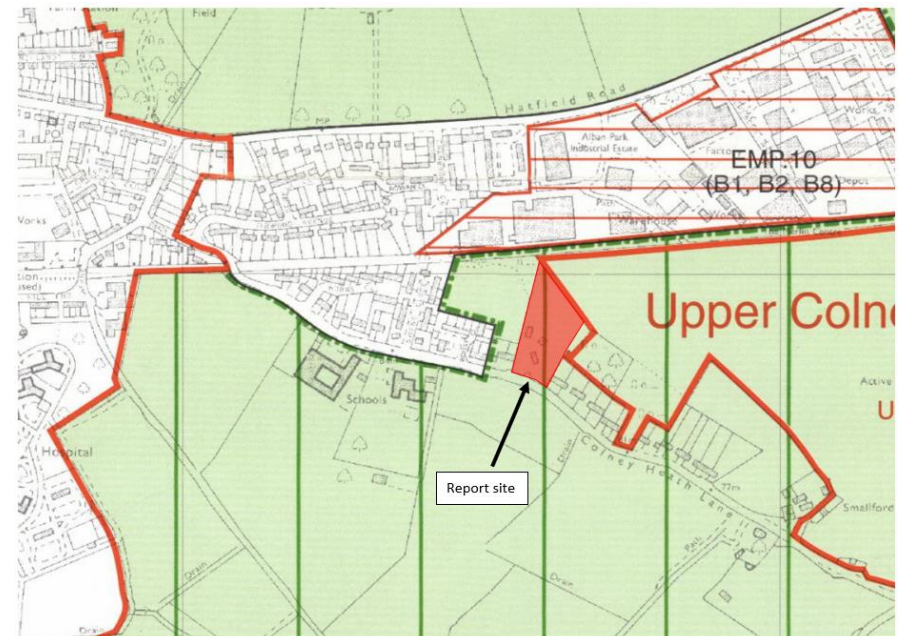
8.7.1 In addition, as previously developed land in the Green Belt, the Council should give such sites "first consideration" ahead of greenfield sites in line with the Government's policy in paragraph 138 of the NPPF.

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

#### 8.8.0 New position of Green Belt boundary

The current position of the Green Belt boundary as defined in the 1994 Local Plan is shown on Figure 5 below. The report site is also shown for context.

Figure 5: Existing Green Belt boundary with report site shown



8.8.1 Somewhat inexplicably, the Green Belt boundary runs between number 93 Colney Heath Lane and number 4 Boissy Close, as illustrated on Figure 6 below.



Figure 6: Position of existing Green Belt boundary between dwellings

8.8.2 Paragraph 139f of the NPPF requires authorities to “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. While the NPPF was not in existence when the Local Plan was adopted in 1994, it is difficult to see how such a boundary would be consistent with current government policy. A review of Green Belt boundaries provides an opportunity to revisit such anomalies, whether as part of considering development sites or simply to rationalise existing boundaries.

8.8.3 The position of a new Green Belt boundary depends on whether the whole site is to be developed (as per Option A) or just the front part of the site (Option B). Either way, it would be easy to define an alternative boundary around the site (or part of it). Such a boundary would be no weaker than, and probably stronger than, the current boundary. The Council could also take the opportunity, if it so wished, to remove the remainder of the dwellings fronting Colney Heath Lane from the Green Belt, thereby further strengthening the remaining Green Belt.

## 9.0 CONCLUSIONS

- 9.1 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 9.2 St Albans is the second largest town in the district and is clearly a sustainable location for growth. The report site is well located in relation to key services and facilities and is within walking distance of schools, shops, health and leisure facilities. It lies around 200m from a bus stop and 3.3km from the railway station.
- 9.3 Having established that Green Belt releases will be necessary, Government policy requires that first consideration be given to sites that have been previously developed and/or are well-served by public transport. This site is considered to meet both of these requirements.
- 9.4 The site has built development to north, east, and west with a road along the southern boundary. Given the pattern of existing development, the site will not extend the built envelope of St

Albans any closer to neighbouring settlements so will not cause coalescence in any form.

- 9.5 There are no constraints that would prevent development.
- 9.6 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.
- 9.7 The site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.




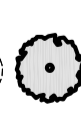








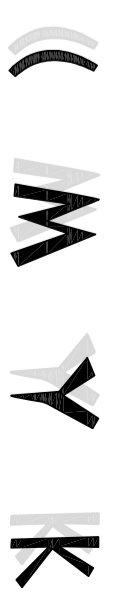
**Accommodation Schedule**

<b>Private Dwellings</b>	
Private Houses	
3 / 4 Bedroom Houses	x 13
Total Private Houses	13
Grand Total Dwellings	13

**Key**

-  New indicative tree & shrub planting.
-  Existing trees to be retained.
-  Existing trees to be removed.
-  1.8m high close board fence.
-  1.8m high brick wall with pier.
-  Quality landscaped areas consisting of block paving & seats in varying bords & complementary colours.

Note : Landscape shown indicative only.

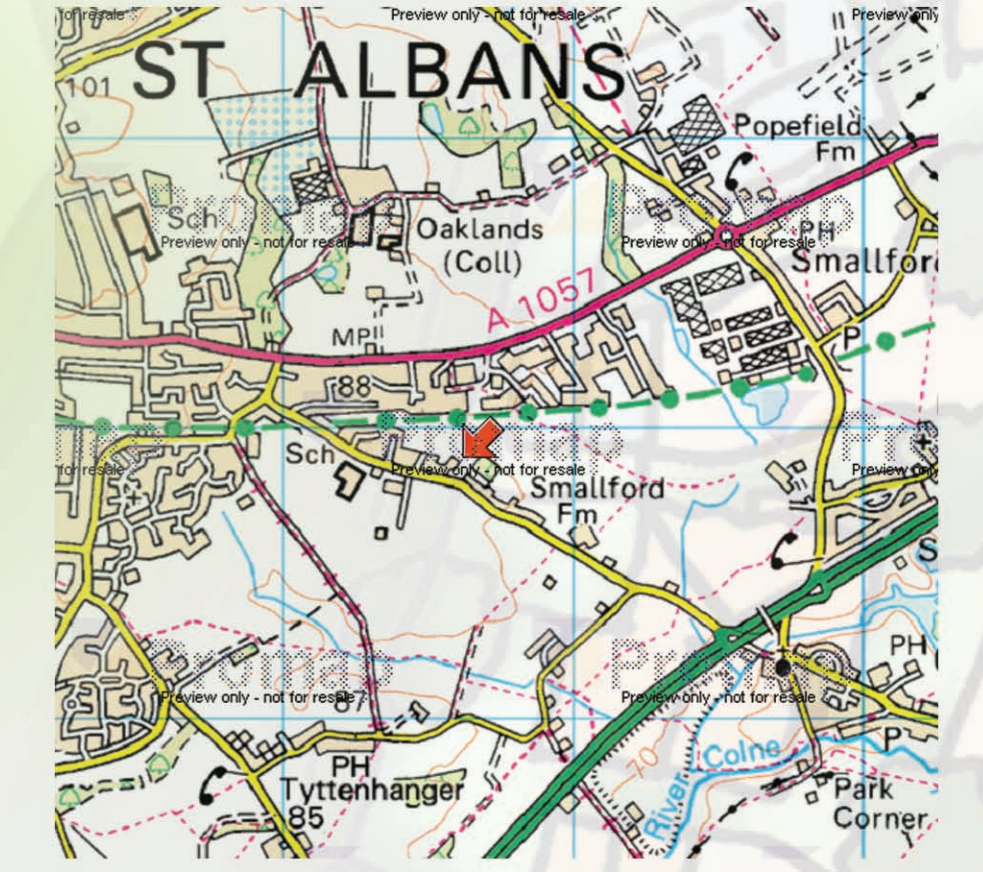


CMYK (Planning and Design) Ltd.  
 6 The Gavel Centre, Porters Wood,  
 St. Albans, Hertfordshire. AL3 6PQ  
 Tel: 01727 830123  
 Fax: 01727 830636  
 Email: [email@cmynk.net](mailto:email@cmynk.net)  
[www.cmyuk.net](http://www.cmyuk.net)

For			
Title	Site Plan		
Job	Colney Heath Lane St Albans		
Scale	1 / 500 @ A2	Drawn	CMYK
Date	November 2010	Plot Ref.	
Dwg. No.	1012/P/02		Rev.



Alban Park Industrial Estate



Location Plan



Colour Layout in Aerial Photo

Key :

-  Proposed Urban Form
-  Proposed Landscaping
-  Existing Landscaping

Land Area : 1.16 Ha  
Density : 35 d / Ha