4.0 Site Photos

5.0 Planning Context

Adopted Plan
The adopted Local Plan identifies a Development Limit for Harpenden, which is one of the two main towns for the borough. The subject land is currently identified as Metropolitan Green Belt.

Designations
The broad extent of the Metropolitan Green Belt is mirrored by a designation for a Landscape Conservation Area which covers a very large geographic area. This specific parcel is identified within Ayes End Valleys and Ridges -B which covers an area of circa 1050 hectares.

The identification of the Development Limit is essentially an exercise to promote the aspiration to concentrate development into the district's existing settlements in order to preserve the general character of the area. This is a central strand of the Plan's sustainable development strategy and will ensure development occurs where it is most accessible and closest to other facilities, so reducing people's need to travel, and where there are existing infrastructure and services to support it. However, in this instance the site is immediately adjacent to a principal town and as such it is a more sustainable location and well related to the general settlement pattern.

It is our understanding that in the 1994 Local Plan that the Harpenden development limit was formed by Cross Lane, but that by consequence of the extension of the Conservation Area in 1999 the Development Limit was also extended south to include built form and other uses down to the Ayres End Lane boundary.

The subject site is therefore contiguous with the Development Limit on two sides and bounded by a railway line to the east. The southern boundary is identified by an existing highway.

The Conservation Area was designated originally in 1969 and has been extended on a number of occasions up to 1999. The Conservation Area is extensive, and the locality close to the subject site would fall into Character Area L as described in the 2008 Conservation Area Character Statement.

The Statement sets out:
"16.7 In contrast with the compact development of Cravells Road, the area to the south has a spacious rural character. Limbrick Hall, dating from the seventeenth century, is entirely surrounded by the Common. The Grange, a turn-of-the century mansion (now divided) also stands in extensive grounds. Limbrick Road, Little Lane and this part of East Common have detached houses that range in size from cottages to a substantial Victorian residence. Grange Court Road includes the former stable block of the Grange. Otherwise, along with Cross Lane, it has inter-war and post-war detached houses, specially laid out.
16.8 South of Cross Lane are modern detached houses and bungalows screened from the Common by trees; and then, at Bamville Farm, a handsome tile-hung turn-of-the-century farmhouse with, close by, the 'Three Horseshoes' public house, which is Grade II listed and was originally a pair of eighteenth century cottages."

Emerging Plan
Through the previous Local Plan process, the Council prioritised larger sites and did not propose any plots to the south of Harpenden for housing development. The Plan was withdrawn, inclusive of issues relating to site selection and the methodology which omitted otherwise sustainable sites.

We note that the subject site would fall to the immediate south of the main bulk of Harpenden, and that there is then a substantial gap to St Albans. The gap from the nearest Harpenden settlement boundary (Ayres End Lane) to the St Albans settlement boundary (housing estate close to Townsend C of E School) is circa 2.1km.

We also note that through the emerging Plan there is a proposal to create a housing allocation to the northern edge of St Albans which would broadly follow the northern development edge but infill the gap between the A1081 and the railway line.

We understand that the identification of the "broad locations" follows from the 2013 Green Belt review work undertaken for the Council by SKM. The subject site falls into parcel 39 and we extract adjacent a plan which sets out the physical extent and gives a description of the area.

The parcel is comprised of a wedge between east and west Harpenden and then part of the gap between St Albans and Harpenden. It sets out that there is a perception of a gap between St Albans and Harpenden as would be appreciated on the A1081 and the railway line. In terms of a reference distance, the stated 2.6km represents the gap as viewed along the A1081, but this overstates the actual gap between the settlements to their boundaries which is circa 2.1km

In terms of urban sprawl, it is assessed to provide "limited or no" contribution.

In terms of coalescence, the Assessment scores the parcel as a whole as "significant". However, at a more granular level, The SKM assessment moves on to set out that the green wedge area (separating east and west Harpenden) would reduce overall openness but makes no real comment about the residual land to the south.

The parcel as a whole is considered to provide a "partial" contribution to the Green Belt purpose concerned with encroachment and the relevant commentary is again more focused upon the green wedge area.

The Assessment does suggest that the parcel contributes to the setting and character of historic towns. It does this by reference to the area being adjacent to a Conservation Area and the potential to safeguard a rural setting. We would note that in our experience, the "historic towns" purpose is not engaged by reference to a Conservation Area. We understand that Harpenden really developed its character from a village to a town over the past century, where it moved from a base population of circa 3000 to the present day where there are circa 30000.

We also note that the Conservation Area Character Statement makes very clear that the built form of Harpenden has changed very markedly since the development of the settlement and indeed since the original designation of the Conservation Area in 1969. We would therefore suggest that the reference to Harpenden as a historic town (drawn by SKM) and a consequential contribution to Purpose 4 should be treated with caution.

The SKM assessment then advises that there is "limited or no" contribution to the purpose concerned with maintaining the settlement pattern.

Our summary of the above assessment is that (in the context of the subject site which is outside the green wedge) that there is little evidence that SKM raised points about its contribution to the coalescence purpose. We would agree that (read on its merits) SKM did raise points about the setting of historic towns but we have also advised that we find this analysis tenuous because the character of Harpenden has fundamentally changed since the 19th century, and proximity to a Conservation Area (which has been subject to substantial change) is not a standard interpretation which would be sufficient to engage Purpose 4.

We therefore find that the site provides very limited realistic contribution to the 5 set purposes of Green Belt, and should therefore be suitable for release.

By consequence of the proposal, the actual separation between St Albans and Harpenden would not change materially by way of distance through that proposed allocation. The proposed use of the subject site for residential uses would provide an obvious and modest extension upon a site which is contiguous on two sides and would not reduce the physical gap between St Albans and Harpenden as measured by the relevant development limits. This will remain a sizeable gap and is not materially different to the existing and would not have any material effect upon that relationship.

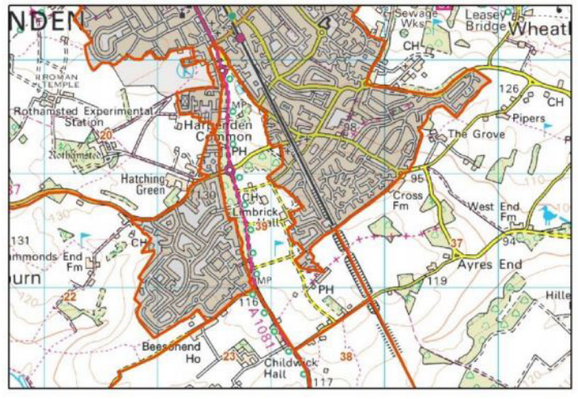
The site provides an opportunity for residential uses, and can incorporate effective landscape buffers to reduce impact on openness as well as the proximity to the railway. The potential yield can therefore ensure proper regard for local character whilst maintaining the potential to make best use of land. It is noted that the area to the immediate north and west comprise built form of relatively low density, whilst the development to the east of the railway line is of much higher density. We would consider that there is potential to provide a development which provides a range of form through the site which would create in the region of 85-120 dwellings which would equate to a net density of up to 30 per hectare. This follows the Council's approach on their proposed sites wherein it was assumed that the net developable area for a site would represent 60% of the overall site area (in this case 6.60 hectares).

In practical terms, we would envisage that the development edge to the north would seek to have material regard to the setting of buildings within the Conservation Area (some of which are locally listed) with an opportunity for denser development in the centre of the plot. This approach also lends itself towards the aspiration to deliver a mix of type and tenure to fully meet the Council's requirements including affordable housing provision.

We argue that by consequence of the development that the potential for planning harm must be extremely limited in any event given the very modest contribution to the Green Belt purposes. The site is bounded by hedgerows to all four sides and with highway to north and south. It is already bounded by built form on two sides and does not reduce the linear gap between St Albans and Harpenden. This of course suggests that the harm caused by potential coalescence is limited.

GB39 –Green Belt Land South of Harpenden

Description The parcel is located to the south of Harpenden. The boundary to the south aligns with Aryes End Lane. It is narrow and 137 ha in size and forms a shallow undulating dry valley sloping from the southeast.



Land use Predominantly grassland, plus farmland, Harpenden Common heathland and recreational activities including Harpenden Cricket Club and Golf Course.

6.0 Transport and Access

Vehicular Access

The developer is committed to ensuring that car and non-car modes of travel are not compromised as a result of the proposed development, and that any improvements and enhancements required to the transport network will be considered as part of any future transport work.

There is currently vehicular access to the north and south of the site, via Mud Lane and Cross Lane. Whilst these roads are minor rural roads they have been determined to be able to take increased vehicle movement with no detriment to existing road users.

The two roads will support two points of access, shown indicatively on the adjacent plan, and which our Transport Consultant has advised could be by simple priority controlled junctions with minimal interference to the existing tree line to create the necessary visibility splays.

Subject to detailed investigations, highways improvements may include short sections of localised widening to provide passing places along Cross Lane and Mud Lane, subject to the designation and availability of highway land.

Local accident data shows 1 serious accident at the Cross Lane junction and 3 slight accidents at the Ayers End Lane junction, which leads to Mud Lane. Initial observations indicate there to be sufficient highway land around the two junctions with the A1081 for minor modifications to improve these junctions if deemed necessary.

7.0 Foul and Surface water and drainage and ground conditions

To inform these representations, the representor has undertaken initial investigative work of the flood risk and determined that the site lies entirely within Flood Zone 1 and thus it represents very low risk of flooding from rivers, streams or surface water.

Whilst subject to further investigation it is likely that surface water disposal will be at greenfield run-off rate via a system of SUDS features/ treatment trains, relying on infiltration where possible and making use of any existing ditch networks.

Foul drainage is likely to be by gravity to access the local public network. This will be subject to further investigation at planning stage and a suitable allowance will be made for upgrading the local network if required.

Subject to further enquiry with the utility suppliers, allowance will be made for local reinforcement of the water, electricity, gas and communications networks in proximity to the site.

site will be investigated to assess the risk of environmental contamination.

Subject to further enquiry on foul connections available in the proximity of the site, a detailed drainage strategy will be developed. Attenuation may be required subject to the scale of any proposed development and a pre-application request to Thames Water, which will be progressed at the appropriate stage.

8.0 Ecology

Given the location of the open nature of the site, the level of ecology is likely to be low. We are not aware of any specific ecological designation for this site.

Any development proposal would be preceded by an ecological and wildlife survey to determine the presence of any rare or notable plants and wildlife. Any development will encourage the reversal of habitat fragmentation and the creation and improvement of habitat links to create eco-corridors, as is the norm.

Further ecological enhancement on the subject site will be implemented as deemed necessary and/or advantageous to enhance its ecological potential as well as make positive contribution to other factors. Woodland management, comprising new planting to form a defensible preservation boundaries and other conservatory measures (such as bat and bird boxes in the trees and hedgerows) would support such aims and can be controlled through the development management process.

9.0 Precedent Studies for Affordable and Private Dwellings

Strong architectural forms, with clean lines and crisp detailing, using traditional materials and agricultural references

Traditional Hertfordshire materials (brick and timber) and forms used in modern buildings.

Buildings clustered in an agricultural pattern

10.0 Development Opportunities and Deliverability

The representor is working with the owner of the site and they support the principle of development. The site is understood to be under one ownership and the use of the site as proposed is understood to be free from legal impediment.

The principle of the use of the land for residential purposes is agreed with the landowner. The proposed access solution can straightforwardly meet appropriate highway standards, in approximately the same position as the existing. These representations have shown that there is a very clear and credible opportunity to deliver in the range of 85-120 new dwellings.

Structural landscaping to screen and integrate the development will be incorporated as an integral part of the proposals; woodland management of existing tree lined boundaries will be implemented to maintain the boundaries as a long term landscape resource; combined management and proposed new structural planting within the site will be considered (alongside design of built form) and ensure that there is beneficial effect on the surrounding landscape.

The detailed layout of the site will be designed with a full appreciation of the setting of the site within the wider landscape and visual context to ensure boundary treatments contribute positively to the existing green infrastructure and landscape character.

Any development proposal would be preceded by an ecological and wildlife survey to determine the presence of any rare or notable plants and wildlife. Any development will encourage the reversal of habitat fragmentation and the creation and improvement of habitat links to create eco-corridors, as is the norm. Further ecological enhancement on the subject site will be implemented as deemed necessary and/or advantageous to enhance its ecological potential as well as make positive contribution to other factors. Woodland management, new planting to form a defensible boundaries and additional measures (such as bat and bird boxes in the trees and hedgerows) would support such aims and can be controlled through the development management process.

The existing physical boundaries on all four sides are very well defined and highly defensible. The existing buildings towards the west of the plot mitigate against any prospect of long views through the site (to and from the direction of west Harpenden). In similar vein, the railway boundary defines the site's eastern boundary. The separation between Harpenden and St Albans is best understood by the existing development limit which is referenced by Ayres End Lane. The proposal infills part of that gap towards the railway line which does not therefore reduce that separation distance in real terms.

There is no legal impediment or other development constraint which would prevent commencement of these units immediately upon planning consent and thus their completion within a three year period.

11.0 Conclusion

The site is a favourable site for the delivery of housing because the site is:

• Contiguous with existing built form (forms an effective infill);

• Able to result in a more cohesive and defensible Green Belt boundary;

• Deliverable without adverse impact upon openness creating no coalescence;

• Well screened by trees and hedges;

• Accessible by vehicles with an existing access off the public highway;

• Accessible by public transport and close to the amenities of Harpenden

• Of low landscape and ecological value;

• Of low flood risk;

• Free from any known legal and engineering impediment;

• Not likely to result in any harm to any designated heritage assets;

• Able to contribute to the OAN

• Under the control of one ownership; and

• Immediately available

We trust that these representations and enclosures are helpful and clear. We trust that you will agree that this is an excellent and sustainable site which is free from impediment and can be delivered quickly to meet your OAN requirements and with proper regard to good design. It should be supported for allocation for residential development of up to 120 units.

We acknowledge that mitigation would be required to offset or balance any negative effects that development would have on the quality, character and value of the landscape. Mitigation would need to address the visual impact that new development would have on the countryside -screening along the boundaries of the area offers opportunities to create wildlife corridors. Structural landscaping to integrate new and existing development would also be needed and any new development would need to be designed to respond to the local setting.

KING & CO

HT4

HELAA Reference (Internal use only)|

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	Mr C.D. Hewitt
Company/Organisation	
Address	1 Coleswood Road, Harpenden, Herts.
Postcode	AL5 1EF
Telephone	[redacted]
Email	[redacted]
Your interest	☐Site Owner ☐Planning Consultant ☐Registered Social Landlord ☐Local Resident ☐Developer ☐Community x Other

Site Details

Requirements:

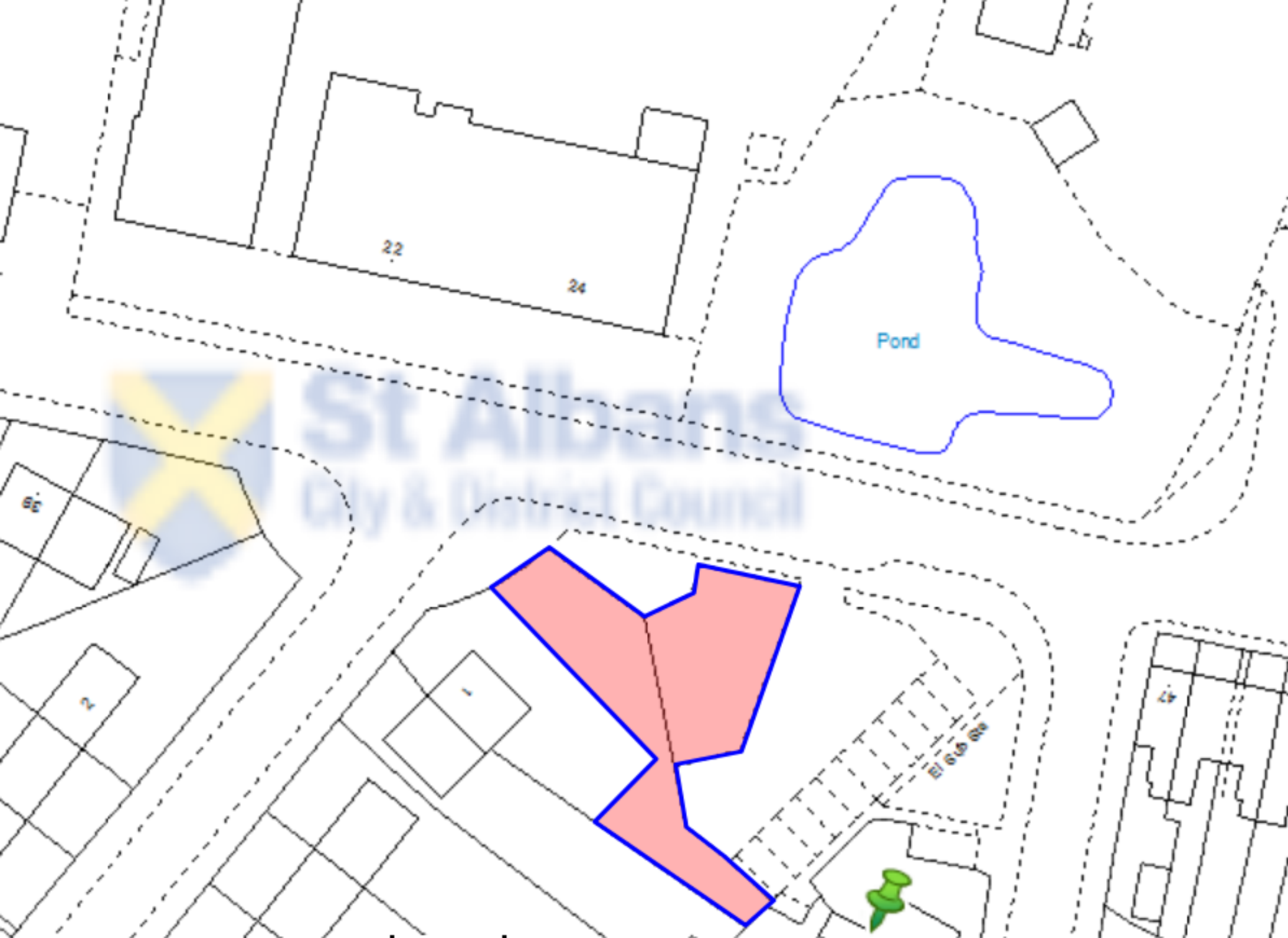
- Delivers 5 or more dwellings or;
- Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)

Site address/location (Please provide a map showing the site boundary)				
Site area (in hectares)				
Coordinates TL	Easting	146	Northing	133
Site Location Plan Attached	☐Yes X☐No			
GIS mapping shapefile attached (in .shp file format)	☐Yes X☐No			
Landownership (please include contact details if known)	St.Albans District Council			
Current land use	Vacant part of Garage Site(fenced off area)			
Condition of current use (e.g. vacant, derelict)	Vacant			
Suggested land use	☐ Housing ☐ Gypsy & Travellers ☐ Mixed Use (please specify) ☐ Employment ☐ Renewable and low carbon energy and heat ☐ Biodiversity Improvement / Offsetting ☐ Green Belt Compensatory Land x☐ Land for Tree Planting ☐ Other (please specify)			
Reasons for suggested development / land use	To enhance area and to improve air quality from increasing road traffic and developments in Grove Road. To make habitat for wild-life and biodiversity in conjunction with drainage pond & trees, opposite. This is the only 'green lung' in this part of Grove Road.			

Likely timescale for delivery of suggested development / land use	x☐ 1-5 Years ☐ 6-10 Years ☐ 11-15 Years ☐ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes x No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes x No
	Flood Risk	☐ Yes x No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes ☐xNo
	Utility Services (access to mains electricity, gas, water, drainage etc.)	☐ Yes ☐ xNo
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	☐ Yes ☐ xNo
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	x☐ Yes ☐ 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	☐ Yes (If yes, please specify) ☐ xNo
Planning Status	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice ☐ Planning Permission Not Sought ☐x Other	
	Please include details of the above choice below (for example planning reference numbers and site history) This site(HA8) was identified as a possible development site in the Harpenden Neighbourhood Plan. However the practicality of this site was not known due to the irregular shape of this small site. Tree planting would be a much more beneficial use of the site due to the ability of trees to absorb carbon and for the well-being of the local residents.	
Other comments	The proposed re-development of the Pan Autos site opposite and the likely re-development of the adjacent Jewsons site, will result in a huge increase in vehicle traffic in Grove Road. The opportunity to counter this massive over-development of the area, should not be missed. More carbon emissions are being produced by the increasing amount of traffic using and queuing for, the Herts C.C. Recycle Centre in Dark Lane.	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24
Pond
St Albans
City & District Council

St. Albans District Council - New Local Plan, 'Call for Sites'

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

1st March 2021

Dear Sirs,

Further to your 'Call for Sites', for the new St. Albans District Local Plan, I wish to propose a local site for tree planting and wilding.

I refer to the portion of land that has been fenced off at the District Council owned Grove Road Garage Site 2, Harpenden, in between Coleswood Road and Longfield Road. This land has been fenced off for some years, and already has several self-set trees. This site, together with the drainage pond and surrounding trees opposite, is the only 'green' area in this part of Southdown and Grove Road. The planting of additional trees on this site would be particularly beneficial, bearing in mind the proximity of the Grove Schools, the Recycling Centre and the proposed re-development of the Pan Autos site. These facilities already generate a lot of car usage, which is causing noticeable air pollution. The situation is exacerbated as the Recycle Centre is still closed on Thursdays and Fridays, which is causing regular queues and tailbacks all along Grove Road. The ability of trees to absorb carbon would improve the air quality and the trees would make the area more visually attractive and would provide habitat for wildlife.

In addition to the tree planting, the current 'bare earth' Grove Road frontage to the garage site, should be planted with thorny flowering shrubs, which provide habitat for wildlife and deter children from cycling and playing on the planted-up area. If children from the Grove Schools were to be involved in the wilding of this site, it would give them the opportunity to understand the urgent need to encourage and preserve wildlife, and prevent climate change during their lifetimes.

This proposal is supported by many other local residents.

Yours sincerely,

Mr. C.D. Hewitt

Archived: 02 June 2021 15:29:59
From: [redacted]
Sent: Tue, 2 Mar 2021 16:18:48
To: Planning Policy (SADC)
Subject: Local Plan Tree Planting-Call for Sites
Sensitivity: Normal

St Albans District Council--New local Plan---Call for Sites

I wish to propose a small site In Harpenden for tree planting and wilding

I refer to the portion of fenced off land which is owned by the District Council within/adjacent to Garage Site 2 , Harpenden . In between Coleswood and Longfield Road .

I propose this on Environmental grounds to alleviate some of the pollution caused by traffic at this particular location along Grove Road

Yours
A P Barwell

HELAA Reference (Internal use only)|

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

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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.

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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:

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- 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

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

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

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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	Chris Colloff – Savills (Agent) Phoebe Juggins – Thames Water Planning Lead (Owner)
Company/Organisation	Savills on behalf of Thames Water Utilities Limited
Address	Hawker House, Napier Court, Napier Road, Reading
Postcode	RG1 8BW
Telephone	01189 520502
Email	[redacted]
Your interest	X Site Owner X Planning Consultant ☐Registered Social Landlord ☐Local Resident ☐Developer ☐Community ☐Other

Site Details

Requirements:

- 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)

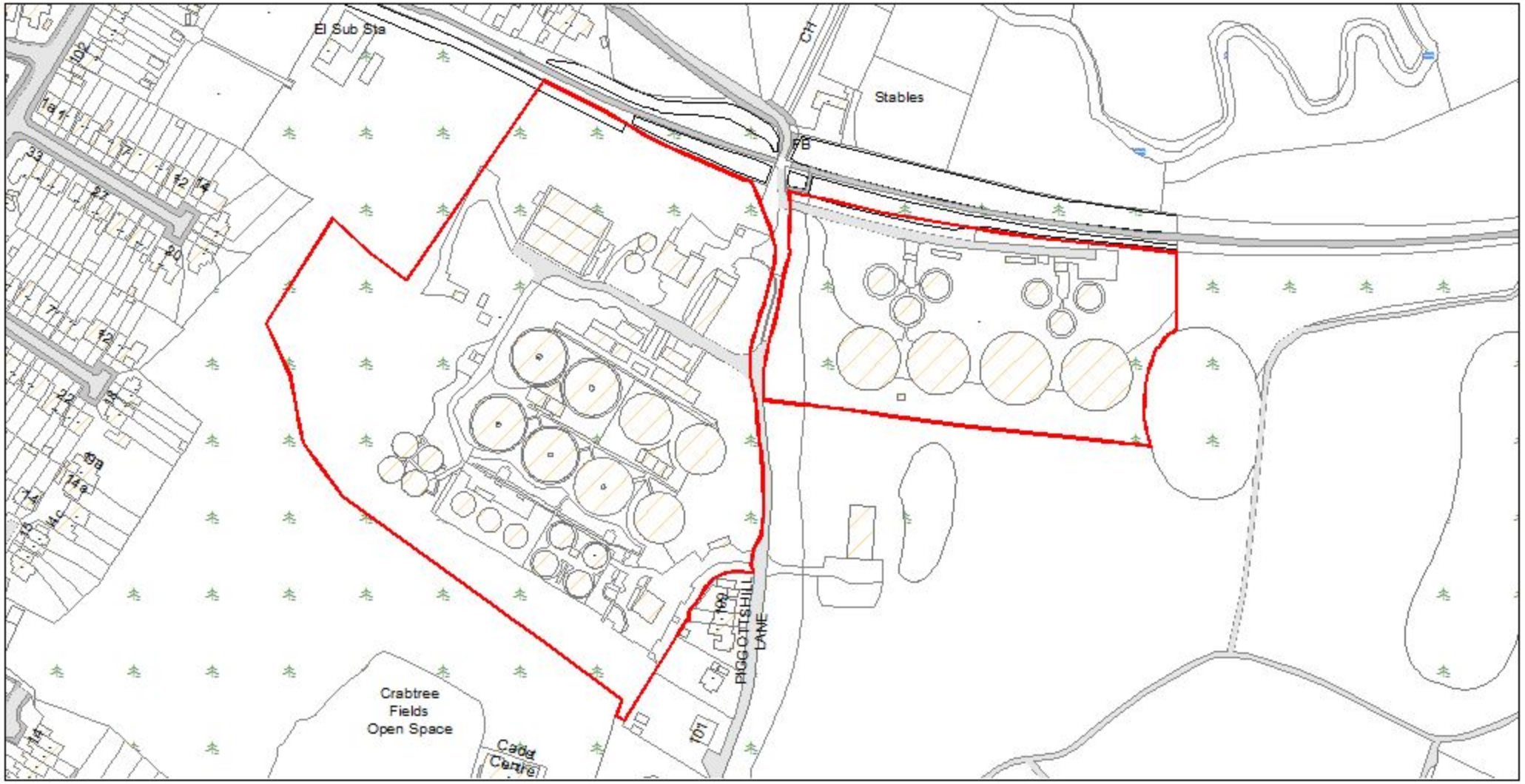
Site address/location (Please provide a map showing the site boundary)	Harpenden Sewage Treatment Works Piggottshill Lane Harpenden AL5 5UN			
Site area (in hectares)	5.76			
Coordinates	Easting	514986	Northing	214522
Site Location Plan Attached	X Yes ☐No			
GIS mapping shapefile attached (in .shp file format)	☐Yes X No			
Landownership (please include contact details if known)	Thames Water Utilities Limited			
Current land use	Sewage Treatment Works			
Condition of current use (e.g. vacant, derelict)	Operational sewage treatment works.			
Suggested land use	X Housing ☐ Gypsy & Travellers ☐ Mixed Use (please specify) X Employment ☐ Renewable and low carbon energy and heat ☐ Biodiversity Improvement / Offsetting ☐ Green Belt Compensatory Land ☐ Land for Tree Planting X Other (please specify)			
Reasons for suggested development / land use	See cover letter.			

Likely timescale for delivery of suggested development / land use	☐ 1-5 Years X 6-10 Years ☐ 11-15 Years ☐ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes X No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes X No
	Flood Risk	☐ Yes X No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes X No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	X Yes ☐ No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	☐ Yes X No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	X Yes ☐ 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	X Yes (If yes, please specify) ☐ No The site is an operational sewage treatment works
Planning Status	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice ☐ Planning Permission Not Sought X Other	
	Please include details of the above choice below (for example planning reference numbers and site history) Upgrades of the works will be necessary to deliver environmental improvements and support growth in the catchment. An opportunity could arise for redevelopment if the relocation of the works to an alternative site were to be viable. Future upgrades of the site could also render areas of the land surplus to requirements and available for development.	
Other comments	The site is a developed site within the Green Belt on the edge of the urban settlement of Harpenden. The removal of the site from the Green Belt would remove a constraint to development of essential infrastructure on the site. In addition, there may be future opportunities for the relocation of the sewage treatment works which could release the existing developed site for development. Further information is provided in the cover letter.	

Harpenden STW



Thames Water Map

Printed By: mhazeldi
Print Date : 02/03/2021

Map Centre On: 515013, 214505
Centre Tile No. : TL1514NW

Comments:

A4 SCALE

0 30 60 120 180 240 Meters

Current Scale : 1:2,500

N

Disclaimer: Based on the Ordnance Survey Map with the Sanction of the Controller of H.M Stationery Office License Number:- 100019345

The position of any boundary or apparatus shown on this plan is given without obligation and warranty, and the accuracy cannot be guaranteed.

Service pipes are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Thames Water for any error or omission. The actual position of mains and services must be verified on site before any works are undertaken.

thameswaterplanningpolicy@savills.com

Spatial Planning Team
St Albans District Council

0118 9520 509

Sent by email to: planning.policy@stalbans.gov.uk

8th March 2021

St Albans District Council – Call for Sites, Draft Statement of Community Involvement and Sustainability Appraisal Consultation

Dear Sir/Madam

Thank you for the opportunity for Thames Water Utilities Ltd. (Thames Water) to comment on the above document. As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments to make on the consultation documents.

Call for Sites

Thames Water own an operational sewage treatment works at Harpenden which lies close to the eastern edge of the settlement. The site is split into two parcels of land either side of Piggottshill Lane and is bounded to the south by residential development with further residential development located to the north of the site on the opposite side of a disused railway line. A golf course lies to the east of the site while a small parcel of land owned by St Albans District Council lies to the west of the site between Thames Waters land and the eastern boundary of the urban area of Harpenden.

The site is a developed site within the Green Belt. However, the site is not considered to perform well against the functions of the Green Belt set out in the NPPF. The preparation of the new Local Plan provides an opportunity to amend the boundaries of the Green Belt. The removal of the site from the Green Belt would reduce constraints to the delivery of essential infrastructure on the site or for redevelopment of any parts of the site which become surplus to operational requirements.

In relation to the performance against the purposes of including the land in the Green Belt, the removal of the site from the Green Belt would have a negligible impact on checking unrestricted sprawl of large built up areas as the site is an existing developed site covered with buildings, plant and machinery required in connection with the sewage treatment process. Similarly, given that the site is an existing developed site on the edge of the existing settlement, its inclusion in the Green Belt plays no appreciable role in preventing neighbouring towns from merging into one another; safeguarding the countryside from encroachment; or preserving the setting and special character of historic towns.

The fifth purpose of the Green Belt is to assist urban regeneration. Again the designation of Harpenden STW as Green Belt does not assist with this purpose. The designation as Green Belt acts as a constraint to development on the existing site which provides essential infrastructure. Removing the site from the Green Belt would assist with the delivery of any necessary upgrades to the site in the future. In addition, should upgrades or the relocation of the works result in the release of part or all of the site, there would be opportunities to regenerate the existing developed site for alternative development reducing development pressure on greenfield sites.

For the above reasons it is considered that the new Local Plan should review the existing Green Belt boundary and remove Harpenden Sewage Treatment Works from the Green Belt. A call for sites proforma has been completed for the site and is enclosed.

Statement of Community Involvement

New development could result in a requirement for upgrades to the existing sewerage network and existing sewage treatment works to ensure that no adverse impacts such as sewer flooding or pollution of land and watercourses. Thames Water cannot prevent the connection of new development to the sewerage network and as such are keen to work closely with the local authority and developers to ensure that any necessary upgrades are delivered alongside development.

In order to assist with the delivery of infrastructure upgrades Thames Water seek early engagement from developers to understand the scale, location and proposed timing of delivery. This can help with identifying when and where network upgrades will be required. Thames Water would welcome additional supporting text within the Statement of Community Involvement encouraging developers to engage with them prior to the submission of any planning applications.

We trust the above is satisfactory, but please do not hesitate to contact us if you have any queries.

Yours sincerely

Thames Water Utilities Limited

Comment

Consultee	Mr Andy Kilvington (1266337)
Email Address	[redacted]
Address	Upland Homes 2 Woodcut Meadows Houghton Conquest MK45 3GP
Event Name	Call for Sites 2021
Comment by	Mr Andy Kilvington (1266337)
Comment ID	CFS14
Response Date	08/03/21 08:42
Status	Submitted
Submission Type	Web
Version	0.1
Files	Screen shot

Name

Andy Kilvington

Company/Organisation

Upland Homes

Address

2 Woodcut Meadows
Houghton Conquest
Bedfordshire

Postcode

MK45 3GP

Telephone

[redacted]

Email

[redacted]

Your interest . Developer

Site address/location (Please provide a map showing the site boundary)

Land accessed off Baulk Close, Harpenden, Herts

Site area (in hectares)

0.3

Site Location Plan Attached Yes

Upload Site Location

Screen shot
Screen shot

GIS mapping shapefile attached (in .shp file format) No

Land ownership (please include contact details if known)

[redacted]

Current land use

Vacant land

Condition of current use (e.g. vacant, derelict)

Vacant land

Suggested land use Housing

Reasons for suggested development / land use

Although this site was previously promoted through the Call For Sites process, this revision is submitted in recognition of the fact that a large percentage of the site falls within Flood Risk Zones Two and Three and are therefore inappropriate for housing development. However, the remainder as identified on the plan annexed offers an opportunity for a simple rounding off of the current development in the area and create a buffer to prevent further incursion into MGB.

Likely timescale for delivery of suggested development / land use 1-5 Years

Contamination/pollution issues (previous hazardous land uses) No

Environmental issues (e.g. Tree Presentation Orders; SSSIs) No

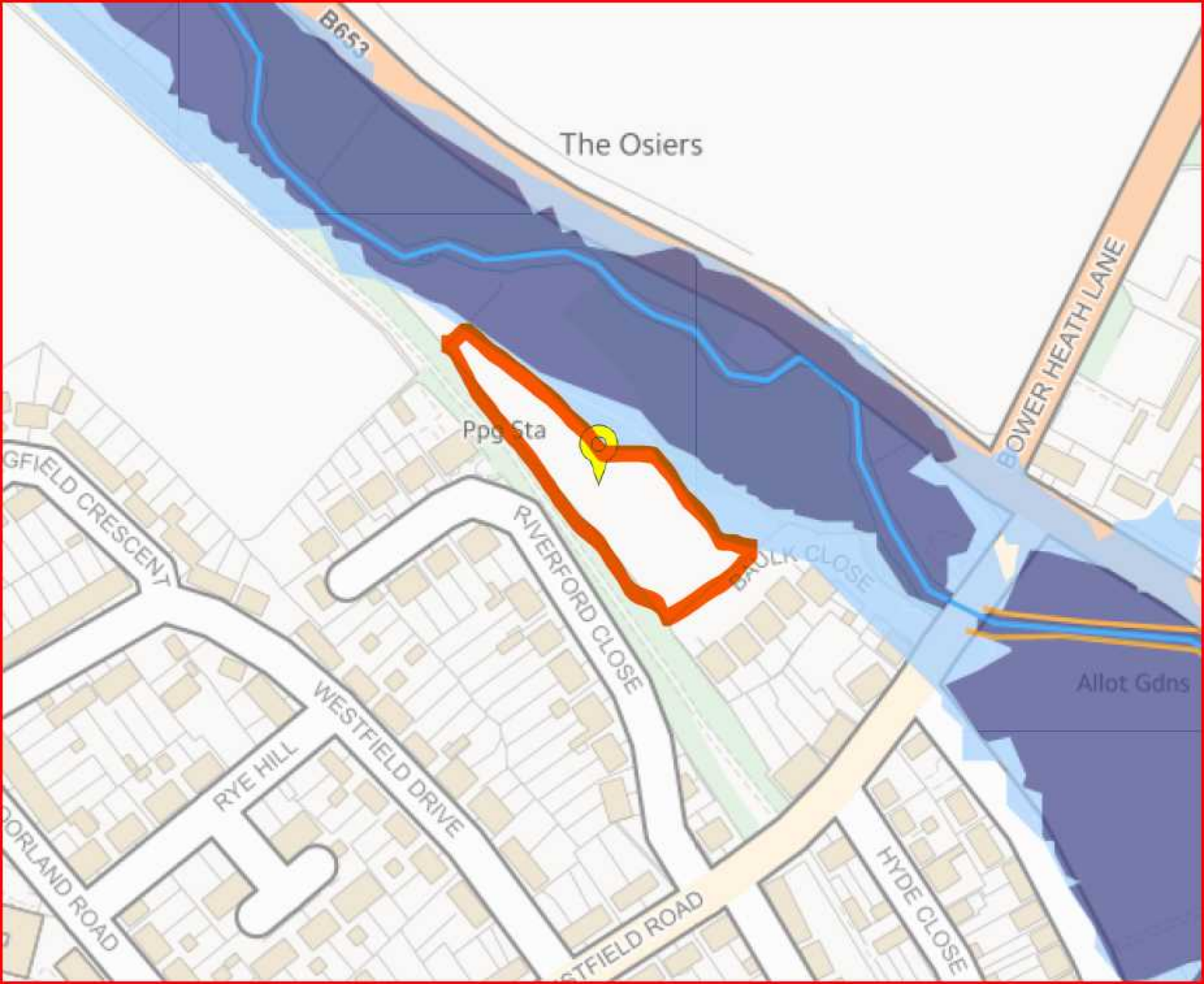
Flood Risk	No
Topography affecting site (land levels, slopes, ground conditions)	No
Utility Services (access to mains electricity, gas, water, drainage ect.)	No
Legal issues (For example, restrictive covenants or ownership titles affecting the site)	No
Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	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

Baulk Close is a private drive over which rights of access have been reserved. Connection points for all services are already located on the site boundary and were installed when the first part of Baulk Close was built some five years ago.

Other constraints affecting the site	No

Planning Status


B653
The Osiers
BOWER HEATH LANE
Ppg Sta
GFIELD CRESCENT
RIVERFORD CLOSE
BAULK CLOSE
Allot Gdns
WESTFIELD DRIVE
RYE HILL
ORLAND ROAD
STFIELD ROAD
HYDE CLOSE

HELAA Reference (Internal use only)|

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	Hayden Todd
Company/Organisation	Aitchison Raffety
Address	154 High Street
Postcode	HP4 3AT
Telephone	[redacted]
Email	[redacted]
Your interest	☐Site Owner X Planning Consultant ☐Registered Social Landlord ☐Local Resident ☐Developer ☐Community ☐Other

Site Details

Requirements:

- 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 adjacent to Old Batford Mill, Lower Luton Road, Harpenden
Site area (in hectares)	0.25
Coordinates	Easting | Northing
Site Location Plan Attached	X Yes ☐No
GIS mapping shapefile attached (in .shp file format)	☐Yes ☐No
Landownership (please include contact details if known)	[redacted]
Current land use	None
Condition of current use (e.g. vacant, derelict)	Derelict/Landscaped
Suggested land use	X Housing (5 to 10) ☐ Gypsy & Travellers ☐ Mixed Use (please specify) X Employment ☐ Renewable and low carbon energy and heat ☐ Biodiversity Improvement / Offsetting ☐ Green Belt Compensatory Land ☐ Land for Tree Planting ☐ Other (please specify)
Reasons for suggested development / land use	Please refer to Statement

Likely timescale for delivery of suggested development / land use	X 1-5 Years (now) ☐ 6-10 Years ☐ 11-15 Years ☐ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes X No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	X Yes (TPOs around edge)
	Flood Risk	Part of site is in flood zone 2
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes X No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	☐ Yes X No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	☐ Yes X No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	X Yes ☐ 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	☐ Yes (If yes, please specify) X No
Planning Status	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice X Planning Permission Not Sought ☐ Other	
	Please include details of the above choice below (for example planning reference numbers and site history)	
Other comments	Refer to Statement	

Land adjacent to Batford Mill, Lower Luton Road

AITCHISON RAFFETY

created on edozo

Plotted Scale - 1:1,250

NORTH

GPS Note:
This survey is related to OSGB36(15) coordinate system by GPS 'rapid static' methods. No scale factor has been applied to the survey information. All horizontal distances taken from this drawing are ground distances.

Co-ordinate Table

Station	Easting	Northing	Level
1	514736.429	215060.396	86.528
2	514789.024	215030.336	86.777
3	514750.472	214985.383	85.719

All levels related to Ordnance Survey active GPS network, at survey station J.

DISCLAIMERS

Every effort has been made to confirm tree species on site, yet it is advised to confirm these details with an arborist before proceeding with any design.

KEY

Survey control station △5
Gate (single)
Gate (double)
Tree Spread and Girth shown to scale
Banking
Foliage Line
Drainage run, direction of flow and pipe size 100
Approximate Position

ABBREVIATIONS

Air Handling Unit	AHU	Water Meter	WM
Bellisha Beacon	BB	Eaves Level	EL
Bollard	BD	Ridge Level	RL
Borehole	BH	Roof Level	RFL
BT Inspection Cover	BT	Soffit Level	SFL
Cable Television Cover	CTV	Threshold Level	THL
Drainage Channel	DC	Parapet Wall Level	PWL
Electricity Cover	EC	Finished Floor Level	FFL
Electricity Pole	EP	Head Level	HL
Earth Rod	ER	Sill Level	SL
Fire Hydrant	FH	Cover Level	CL
Gas Valve	GV	Invert Level	IL
Gate Post	GP	No Visible Pipes	NVP
Gully	GY	Unable to Lift	UTL
Inspection Cover	IC	Foul Water	FW
Junction Box	JB	Sump Level	SUL
Kerb Outlet	KO	Surface Water	SW
Lamp Post	LP	Brick Paviors	BP
Manhole	MH	Concrete	CON
Marker Post	MK	Concrete Paving Slabs	CPS
Post	P	Flower Bed	F\B
Pipe	PE	Shrub Bed	S\B
Road Sign	RS	Tactile Paving	TAC
Rodding Eye	RE	Unsurfaced	U\S
Marker Post	MK	Brick Wall	BW
Sign Post	SP	Retaining Wall	RW
Stop Valve	SV	Chainlink Fence	CLF
Stop Tap	ST	Chestnut Paling Fence	CPF
Telegraph Pole	TP	Iron Railing Fence	IRF
Traffic Light	TL	Metal Security Fence	MSF
Vent Pipe	VP	Post and Chain Fence	PCF
Post and Rail Fence	PRF	Post and Wire Fence	PWF
Wooden Panel Fence	WPF		

Client
ANTON GROUP

Project
BATFORD MILL
LOWER LUTON ROAD
HARPENDEN

Title
TOPOGRAPHICAL SURVEY

Drawing Number
TS19-394-1

Revision	Description	Date

Scale 1:200@A1 *Sheet* 1 *of* 2

Drawn by	*Checked by*	*Date of Survey*
CAW	PG	AUG 2019

terrain surveys
Tel 01438 841300
enquiries@terrainsurveys.co.uk
www.terrainsurveys.co.uk

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TOWN AND COUNTRY PLANNING ACT 1990

Call for Sites 2021
Housing Economic Land Availability Assessment

Land adjacent to
Old Batford Mill
Lower Luton Road
Harpenden
AL5 5BZ

March 2021

On behalf of
Mr George Antoniou

Prepared by
Hayden Todd
BRP (Hons) MRTPI

154 High Street
Berkhamsted
Hertfordshire
HP4 3AT

Telephone: 01442 874087
Email: hayden.todd@argroup.co.uk

AITCHISON RAFFETY

CHARTERED TOWN PLANNING CONSULTANTS

CONTENTS

1. INTRODUCTION

1.1 My name is Hayden Todd and I am an Associate Director at Aitchison Raffety, Chartered Town Planning Consultants. I have a Bachelor's Degree in Environmental and Resource Planning (Hons) and am a Member of the Royal Town Planning Institute.

1.2 This representation has been prepared in response to the 'Call for Site 2021' to be considered in the Council's Housing Economic Land Availability Assessment.

1.3 The representations are made of behalf of Mr G Antoniou, the freehold owner of the redundant land adjacent to Old Batford Mill, Lower Luton Road, Harpenden. The land is free from restrictions and is available now for development.

1.4 The site is suitable for business use and would provide a logical extension of the existing Batford Mill employment designation. Alternatively, it could provide a site for new housing, which could include a 100% affordable allocation.

1.5 This Statement sets out why the development of the site for employment use or housing would be desirable in planning terms. Additional information could be submitted to elaborate on any of the points raised.

2. SITE DESCRIPTION AND SURROUNDINGS

2.1 The site is a 0.2 hectare irregular shaped plot located on the south side of Lower Luton Road, directly adjacent to the junction with the access to Batford Mill. The site is sustainably located within the main built-up area of Harpenden, directly opposite residential properties and the recently constructed Katherine Warrington School.

Allocation site outlined in red

2.2 The site consists of an open grassed area that formed part of the curtilage to the Old Batford Mill redevelopment. It has remained in private ownership and is currently redundant. Mature trees are positioned around the western and southern boundary which are subject to a Group Tree Preservation Order. A timber three bar fence and metal gate extend along the boundary with the access road serving Batford Mill.

Street scene of the allocation site and Batford Mill access

2.3 The surrounding area is mixed use in character. Residential properties and a school are located on the opposite side of Lower Luton Road. Directly to the east is Batford Mill, which is an allocated employment site consisting of light industrial buildings and various commercial uses. To the west and south is the River Lee.

2.4 The site lies within the Metropolitan Green Belt. Ground levels rise in a northerly direction. The lower section of the site adjacent to the river is located within Flood Zone 2.

3. PROPOSED DEVELOPMENT

3.1 The proposal seeks the removal of the site from the Green Belt and the allocation of the land for employment generating uses or alternatively as a housing scheme.

3.2 The site originally formed part of the Batford Mill redevelopment and could accommodate another detached commercial building. The building could align with and form a logical continuation of the adjacent commercial properties in this allocated employment area. The building could provide high quality business floor space for small to medium size businesses, reducing the need to travel outside Harpenden.

Indicative layout demonstrating the position of an additional commercial building that could be achieved in this allocated employment area if the Green Belt boundary was revised

3.3 Alternatively, the site could provide land for much needed housing development. This residential scheme could include an allocation for 100% affordable housing or another housing type for which there is a significant need.

3.4 A commercial or housing development could be designed to preserve the character and appearance of the area and to avoid harm to the natural environment.

3.5 The land adjacent to Batford Mill is suitable for commercial use or residential development and should be excluded from the Green Belt to meet the District's needs. This can be achieved with minimal harm to the Green Belt, which would be clearly and convincingly outweighed by the associated planning gains.

4. RELEVANT PLANNING HISTORY

4.1 A planning application for a car park at the land adjacent to Batford Mill (5/201/0182) was withdrawn following concerns expressed relating to the Green Belt location.

4.2 A planning application for proposed alterations to provide for the division of the existing factory into 9 light industrial units at Batford Mill (5/1978/0274) was granted conditional permission on 3 August 1978. The land adjacent to Old Batford Mill, and subject to this submission, was included within the application site for the approved redevelopment.

5. PLANNING POLICY FRAMEWORK

5.1 Central Government advice is contained within the National Planning Policy Framework. The most relevant aspects of the Framework are summarised below.

5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

5.3 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. Paragraph 8 identifies the three dimensions to sustainable development, which are economic, social and environmental.

5.4 Paragraph 11 sets out the presumption in favour of sustainable development as the central aspect of planning policy and decision taking. In terms of 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. 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.

5.5 Section 3: 'The plan making framework' confirms that development plans must include strategic policies to address priorities for development and use of land. Paragraph 20 states that policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), employment and other commercial development.

5.6 Paragraph 23 states that 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.

5.7 Paragraph 35 relates to the examination of local plans and notes that they are 'sound' if they are:-

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

5.8 Section 5: 'Delivering a sufficient supply of homes', at paragraph 59 confirms the Government's objective of significantly boosting the supply of homes. It refers to the importance of a sufficient amount and variety of land coming forward where it is needed. To achieve these aims local authorities are required to use their evidence base to ensure that local plans meet the full objectively assessed needs of their area. The revised NPPF introduces new housing delivery tests and consolidates other mechanisms to boost housing supply. It places an even greater emphasis on meeting housing needs and imposes additional penalties if targets are not achieved.

5.9 Paragraph 68 identifies the importance of small and medium sized sites in contributing to meeting the housing requirement of an area, and notes they are often built-out relatively quickly.

5.10 Section 6: 'Building a strong, competitive economy' confirms that policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It notes that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

5.11 Section 11: 'Making effective use of land' confirms that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. It notes that policies should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

5.12 Section 12 'Achieving well-designed places', at paragraph 124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. It notes that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

5.13 Section 13: 'Protecting Green Belt land', states that the Government attaches great importance to Green Belts. 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.

5.14 Paragraph 134 identifies the five key purposes of the Green Belt:-

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

5.15 Paragraph 136 confirms that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt

boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

5.16 Paragraph 139 refers to defining new Green Belt boundaries and advises that local planning authorities should:

- ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

6. PLANNING APPRAISAL

Employment Land Supply

6.1 The National Planning Policy Framework (NPPF) has at its heart the achievement of sustainable development, which has economic, social and environmental dimensions, to be sought simultaneously. The key economic objective expressed in the NPPF, is to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth, innovation and improved productivity. Paragraph 80 of NPPF requires councils to create the conditions in which businesses can invest, expand and adapt. It advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

6.2 The Hertfordshire London Arc Jobs Growth and Employment Land Study (GELS) reviewed all employment land in the district and found that there is 'virtually no land for net growth in employment uses' and insufficient business class land to meet current and future needs. The provision of employment land has been in decline, which is a trend only likely to continue with changes in permitted development legislation and rising house prices. The shortage of suitable employment land has contributed to the high levels of out-commuting the district experiences. Out-commuting is having adverse implications on the local economy and sustainability, increasing the environmental footprint of the district. If St Albans is to achieve its aims and vision of creating a vibrant, unique and prosperous district, which is an outstanding place to work and live, this shortfall and trend needs to be addressed.

6.3 'The South West Herts Economic Study Update' (SWHES) reiterates the findings of the GELS and confirms that there is a strong and growing demand for office floor space in the study area. The SWHES identifies St Albans as an important sub-regional office location and notes that availability of office space is critically low, which is acting as a 'significant' barrier to local growth and investment. It confirms that vacancy rates are now so low that any further losses

are likely to result in the displacement of jobs and businesses. With reference to these points, the SWHES states the following:

*"**The availability of office space is now at very low levels**; 5.8% of office space is currently available but this has fallen by 11 percentage points since 2010 and is at critically low levels in St Albans and Hertsmere. The very limited supply of office space is now acting as a **significant barrier to growth and investment**, and will make it increasingly difficult to attract and retain growing businesses. The fall in supply has been driven by a combination of growing demand and a significant fall in the stock of office space, with some data sources indicating this has fallen by as much as 20% in the last decade."*

6.4 The withdrawn draft Local Plan identified a serious shortfall in available employment land. It recognised that it will not be possible to address this shortfall and associated travel patterns without the allocation of Green Belt land for business use. This local need for employment land constitutes the exceptional circumstances required by the NPPF for changes to the Green Belt boundary. The NPPF requires the changes to the Green Belt boundaries to be done having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. As such, the allocation of this site would provide an opportunity to help address the serious shortfall in employment land.

6.5 High priority should be given to the economy in the plan making process which forms a key part of sustainable development. It is essential that a diverse range of employment sites are provided in various locations to cater for the needs and desires of a growing number of small to medium sized businesses. This cannot be achieved through the allocation of a few large business parks as previously proposed. The reliance on large business park sites being delivered within the required timeframe is also problematic given the complexity and uncertainty of such developments.

6.6 Small to medium size businesses make significant contributions to the economy and require high quality, smaller sized premises in strategic locations that are secure and well connected to highway networks and built up areas. The site at Batford Mill is an ideal location and provides an opportunity to help address the serious shortfall in employment land and add to the diversity of the allocated sites. The site is available now and deliverable for this purpose.

6.7 Batford Mill is sustainably located within the main built-up confines of Harpenden where it is well served by the bus network. It has direct access onto the B653 and located near the junction with the M1 and, as such, is well positioned in terms of access to the highway network. The site is also strategically positioned near the large sustainable settlements of St Albans, Luton and Welwyn Garden City. Furthermore, the development of this site would provide an ideal opportunity for employment growth to support Harpenden and the surrounding settlements, reducing the need for residents to commute outside the district.

6.8 The proposed allocation of this site therefore provides a unique opportunity to help address employment land shortages on a strategically positioned and sustainable stie within Harpenden.

Residential Development - Housing Supply

6.9 The NPPF places great weight on the need to provide housing. Local authorities are required to objectively set out the housing needs for their area and then to identify land to meet these needs. St Albans City and District Council only have 2.4 years housing land supply, which is a

significant shortfall in relation to national guidance. The Council is therefore unable to demonstrate the 5 year supply of housing and, as such, has failed to significantly boost the supply of housing as required by the NPPF.

6.10 This site provides an ideal opportunity to deliver much needed housing on land that does not serve any identifiable purpose. The site is located within Harpenden and is directly adjacent to the Batford Mill employment site. Residential development and a new school are located opposite. The site is therefore already subject to a significant urbanising influence and viewed within the context of the built-up confines of Harpenden. As such, the allocation of the site for residential development would provide much needed housing, for which there is a clear and significant need, without compromising the main purposes of the Green Belt. The allocation of this site would contribute positively towards the social role of sustainable development, as defined in paragraph 8 of the NPPF. This requires the planning system to support *'strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'.*

6.11 The site could provide an attractive small to medium sized development addressing an identified need for a certain housing type. This could include affordable housing, retirement housing or supported living units. Paragraph 68 of the NPPF identifies the importance of small and medium sized sites in contributing to meeting the housing requirement of an area, and notes they are often built-out relatively quickly. The site is free from ties and available now for development, ensuing it could be development in a timely manner to address the pressing and urgent need for new housing.

6.12 The Council's Green Belt Study recognised the potential of small-scale boundary changes which it confirmed could be implemented without compromising the overall function of the Green Belt. This point was reiterated in the findings of the Examining Inspectors who criticised the overly narrow focus taken in the preparation of the withdrawn draft Local Plan. The Examining Inspectors noted the Council had failed to appropriately consider smaller site, such as the proposal site, which would have had less impact on the purposes of the Green Belt than the large strategic allocations. With reference to this point, the Inspectors stated the following:

"Overall, although previously recognised as a source of housing to be identified at some stage, smaller sites have been disregarded as part of the plan making process. 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."

6.13 In summary, there is a significant shortage of housing land and the allocation of this site could help address the identified need for new homes without compromising the purposes of the Green Belt.

Character and Appearance

6.14 The NPPF seeks a high quality environment and that new development is sympathetic to local character. This approach is reflected in Policy ESD1 of the Harpenden Neighbourhood Plan, which requires new developments to be visually attractive and of a high quality design that maintains or enhances the character of the area.

6.15 The site is located on the edge of Harpenden and directly adjacent to the Old Batford Mill Employment Area. It previously formed part of the redevelopment of this site and consists of an open grassed area with a gate and fence extending along the access road. The site is set back from the public highway and could accommodate new development without harming the character and appearance of the surrounding area.

6.16 The allocation of this site for commercial development provides an ideal opportunity for the natural and logical expansion of the existing employment site, which it historically formed part. The new development could align with the row of existing buildings, continuing the linear arrangement of the other side of access road and terminating towards the end of the original curtilage of Batford Mill. New development in this location would respect and respond appropriately to the layout of existing buildings and surrounding informal pattern of development.

The proposed allocation would respect the existing building line and surrounding pattern of development

6.17 It is acknowledged that the site forms a landscaped area and contains serval trees which are subject to a Preservation Order. However, the trees are positioned around the perimeter of the site and could therefore be retained in any future development plans. The individual trees are also lower grade specimens (category C) and could be replaced without harming visual amenity. These points were confirmed in the David Clarke Arboricultual Report that was submitted in support of an application for an overflow car park. The Arboricultual Report included a detailed survey and assessment of the trees and how they could be protected from a centrally positioned development. Please refer to the Arboricultual Report which is included with this submission and addresses the issues associated with trees in detail.

The mature trees are located around the edge of the proposed allocation site where they could be retained, preserving visual amenity

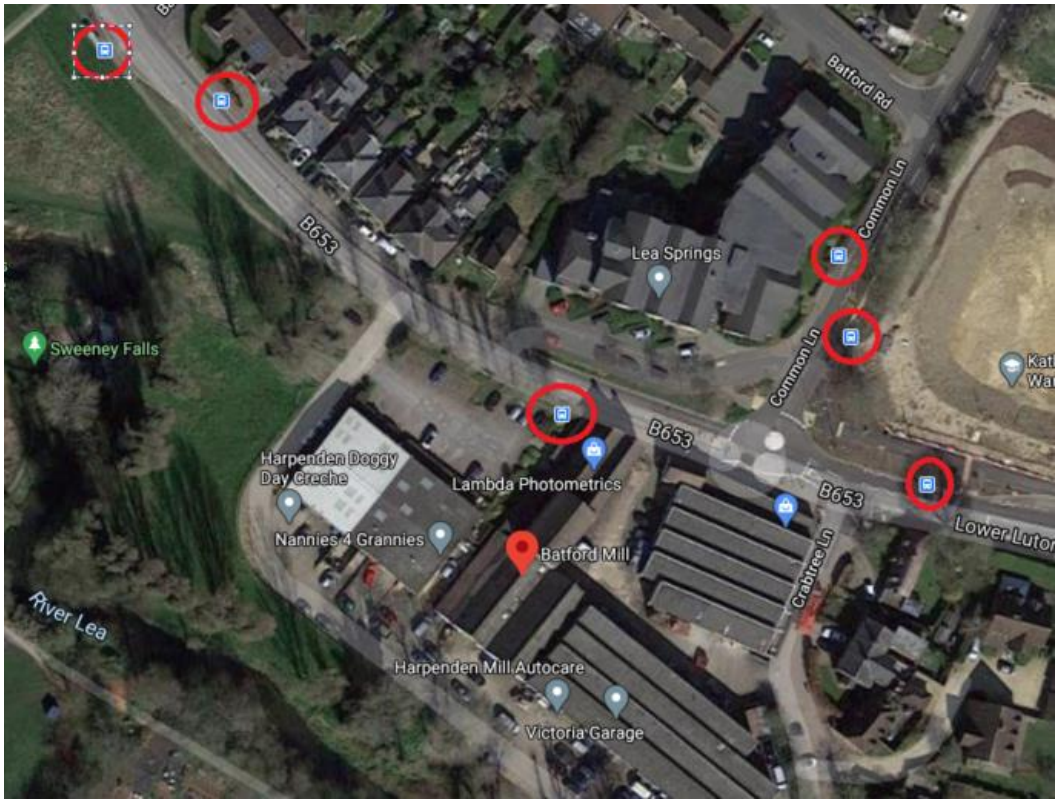
6.18 The protected trees would filter views and create an attractive setting for any new development. The site is of a size that would allow for landscaping to be retained around the edges, preserving the open character of the area. Furthermore, the existing landscaping along the site perimeter could be supplemented with native planting, creating an attractive verdant setting for a new commercial or housing scheme. The new native planting and landscaping would provide an opportunity for net biodiversity gains, contributing positively towards the natural environment.

Appropriate location of the site for new development

6.19 The NPPF sets out the Government's approach to promoting sustainable transport and encourages solutions which reduce congestion and facilitate the use of sustainable modes of transport. It notes that development should be focused on locations which are or can be made

sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

6.20 The site is located within the built-up confines of Harpenden. There are bus stops in either direction within 50m of the site that links this part of Harpenden to the town centre and surrounding settlements. The site is within easy walking distance of a wide range of services and facilities. A new school has been constructed directly opposite. In addition, the site has excellent links to the motorway and is strategically on the B653, near the large sustainable settlements of St Albans, Luton and Welwyn Garden City. The future occupies or users of the site would therefore have a range of genuine sustainable transports options available and would not be dependent of private motor vehicles.



The site is sustainably located in Harpenden near numerous bus stops

6.21 The site is therefore sustainability located and provides an ideal opportunity for future allocation for either commercial or housing development.

Flood Zone

6.22 The lower portion of the site adjacent to the River Lea is located within Flood Zone 2. However, ground levels rise steeply and the upper section where any future development would be concentrated falls within Flood Zone 1. It is noted that this part of the River Lea is subject to flood defences and there are no records of floods in this area. This point was confirmed in the Flood Risk Assessment submitted in support of the application for an overflow car park, which raised no concerns with development on this site. Please refer to the accompanying Flood Report and topographical survey which addresses this issue and illustrates the rise in ground levels from the river.

6.23 Furthermore, the commercial use of this site would fall within the 'less vulnerable category' which can be constructed within Flood Zone 2. It is noted that the adjoining buildings within Batford Mill are also located in Flood Zone 2.

6.24 Whilst residential development would fall within the 'more vulnerable' category as confirmed in the Government's 'flood risk assessment checklist' this use can also be constructed in Flood Zone 2 without a Sequential Test.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓*

Key:
✓ Development is appropriate
✗ Development should not be permitted.

Flood Risk Assessment Checklist

6.25 The site stands well above any risk of fluvial flooding and is therefore suitable for commercial or residential development.

7. CONCLUSION

7.1 The allocation of the land adjacent to Batford Mill would provide an ideal opportunity for development in the district creating several significant planning gains, such as providing much needed employment generating floor space or helping to address the housing shortage, without conflicting with the purposes of the Green Belt. It is therefore requested that this site be released from the Green Belt and allocated for development.

David Clarke Chartered Landscape Architect and Consultant Arboriculturist Limited

David Clarke BSc (Hons) PD Arb (RFS) M Arbor A CMLI

ARBORICULTUAL REPORT:

ARBORICULTURAL IMPACT ASSESSMENT and ARBORICULTURAL METHOD STATEMENT

In relation to a Planning Application

at:

Land adjacent to Batford Mill, Lower Luton Road, Harpenden, Hertfordshire

Compiled by:
David Clarke
BSc (Hons) Land Man, PD ARB (RFS), CMLI, M Arbor A

January 2020

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Contents

1.0 Instruction

1.1 I have been instructed by my client – George Antoniou - to provide an appraisal of the likely impact to, and implications for, trees on, or adjacent to, `Land at Batford Mill, Lower Luton Road, Harpenden, Hertfordshire' in relation to a planning application on the site.

1.2 The application is for the installation of an overflow car parking area using the existing access point'.

2.0 Introduction

2.1 Qualifications and Experience

2.1.1 I am David Clarke, I have a Bachelor of Science Honours Degree in Landscape Management from Reading University and I am a Chartered Landscape Architect and Chartered Member of the Chartered Landscape Institute (1998). I hold the Professional Diploma in Arboriculture (RFS) (2012) and I am a Professional Member of the Arboricultural Association. I have 28 years' experience of working in both the private and public sector in relation to arboricultural and landscape issues.

2.2 Scope of this Report

2.2.1 This Arboricultural Impact Assessment and Arboricultural Method Statement form the Arboricultural Report for the Planning Application. They should be read in conjunction with Tree Protection Plan - TPP/LBMLLRHH/010 A - and Arboricultural Survey (Appendix A). The Arboricultural Report is aimed at identifying and addressing those matters concerning trees in relation to the proposed planning application. It will clarify these issues:

- The principles and procedures to be applied to achieve a harmonious and sustainable relationship between retained trees and structures.
- The species, size, position and condition of those trees within the area of the proposed development where trees may potentially have some significance to the proposed development. The full survey schedule is set out in Appendix A.
- The impact of the proposed development upon these trees (and vice versa) including those trees to be removed due to the proposed development.
- Any measures that are required to protect retained trees during the proposed works.

2.2.2 The trees have been assessed (see Arboricultural Survey – Appendix A) as set out in BS BS5837: 2012 `Trees in relation to design, demolition and construction. Recommendations.' Arboricultural Surveys were undertaken by myself in January 2020 in relation to this planning application.

2.2.3 Tree numbers within the text (T1-T7 and G1-G5) relate to numbers designated as part of the Arboricultural Survey unless otherwise stated. The trees are plotted on Tree Protection Plan - TPP/LBMLLRHH/010 A - which accompanies the planning application.

2.2.4 BS 5837: 2012 `Trees in relation to design, demolition and construction. Recommendations' provides recommendations for the assessment of trees on development sites and suggests four categories into which trees should be placed for assessment purposes. These categories have been used as part of the assessment of trees within this report.

2.3 Relevant Background Information

2.3.1 It is understood - from the mapping service provided on the St Albans City and District website - that trees on the site are protected by Tree Preservation Order (TPO) 1765. These are Poplars T5-T7 and those located within G1-G4 of this report. It is noted that not all the Poplars located within G4 are protected by the TPO. The mapping service states that the site is not located within a Conservation Area.

2.3.2 It is recommended that this information on protected trees be confirmed by anyone proposing to undertake any (future) works to trees – both inside and outside the application site. This should be undertaken in writing with the Local Planning Authority (LPA) before proceeding with any tree works unless works within this report are agreed as part of a Planning Approval.

2.4 Documents and Information Provided

2.4.1 All plans within this report are based upon drawings supplied by Clarke and Whalen Architects Ltd, Harpenden, Hertfordshire

2.4.2 This document has been prepared in accordance with guidance set out in British Standard BS 5837: 2012 `Trees in relation to design, demolition and construction. Recommendations' (BS 5837:2012

3.0 Report Limitations

3.1 The report is for the sole use of the client and its reproduction or use by anyone else is prohibited unless written consent is given by the author.

3.2 The report observations are to be considered as correct at the time of inspection only. Trees are a growing, living organism, and are readily affected by many environmental factors. As such their condition and circumstances can change in a very short period of time. Therefore this report should be construed as valid for an absolute maximum of 12 months from the date of the Arboricultural Survey provided all factors remain unchanged.

3.3 This is an arboricultural report and as such no reliance should be given to comments relating to buildings, engineering, soils or other unrelated matters. The inspection of trees was undertaken from ground level and they were not climbed. No samples of wood, roots, soils or fungus were taken for analysis. Observations of the trees were confined to what was visible from within the site and surrounding public places. A full hazard risk assessment of the trees was not undertaken.

3.4 The presence of TPOs, a Conservation Area, or other designations, may affect the use of the site and the management of trees on the site. These designations can be served on the application, or adjacent, sites at any time. The landowner, or his representatives, should therefore satisfy themselves as to the presence (or absence) of these designations prior to:

- Undertaking any works to trees on, or adjacent to, the site. Where necessary written permission from the Local Authority will be required prior to undertaking tree works.
- Undertaking any of the works specified in this Arboricultural Report before planning permission is granted.

4.0 Brief Description of the Application Site and the Proposed Development

4.1 The application site is located adjacent to Batford Mill, Harpenden, Hertfordshire. It consists of an open grass field which is bound on the southern and western aspects by River Lee. Batford Mill and commercial buildings are located to the east and includes car parking areas and other hardstanding associated with its use. Lower Luton Road runs to the northern

boundary. There are general falls of approximately 1.5 m from the northern boundary down to the edge of the river bank as well as falls of around 1.0 m from the east to the west. There are some additional changes of levels (banks and mounds) within the site.

Photograph A – Showing the existing grass field from within the site.

4.2 There are trees located to the site boundaries – both inside and outside the site. They predominately consist of mature Poplar species which have been planted in rows along the edge of the River Lee. Other trees include Goat Willow, Hawthorn, Field Maple and Beech. The Poplars are of moderate condition with sign of decline in their crowns – dead wood and dieback. They have narrow crowns which is typical of the species. They are prominent in the local area but do not form a natural landscape feature.

Photograph B – Showing the relationship of Poplars within G2 to the River Lee.

4.3 The application is for the installation of an overflow car parking area using the existing access point'.

5.0 General principles for protection of trees during development

5.1 It is equally important to ensure the protection of trees both above and below ground. Guidance is provided in BS 5837: 2012 as to the protection of trees, before, during and after development.

5.2 The Arboricultural Impact Assessment will set out the potential impact of the proposals on trees and vice-versa. There is a need to protect trees and provide an Arboricultural Method Statement where proposals will impinge, or impact on the Root Protection Areas (RPAs) of retained trees. Root Protection Areas (RPAs) are a layout design tool indicating the minimum area around a tree deemed to contain sufficient roots and rooting volume to

maintain the tree's viability, and where the protection of the roots and soil structure is treated as a priority. These are set out as Construction Exclusion Zones and have been calculated as part of the Arboricultural Survey.

5.3 The RPA for each tree is initially plotted as a circle centered on the base of the stem. Where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area will be produced. These factors include the morphology and disposition of the roots, when known to be influenced by past or existing site conditions - such as the presence of roads and structures - and site topography. Modifications to the shape of the RPA within this report reflect a soundly based arboricultural assessment of likely root distribution. The RPA may change its shape but not reduce its area whilst still providing adequate protection for the root system.

5.4 Proposals may impinge on RPAs but these should be minimal and construction techniques such as specialized foundation designs should be considered to reduce the impact of development. The proposals will relate specifically to the site conditions and each individual tree and its category within the BS 5837 grading system.

David Clarke Chartered Landscape Architect and Consultant Arboriculturist Limited
David Clarke BSc (Hons) PD Arb (RFS) M Arbor A CMLI

ARBORICULTURAL IMPACT ASSESSMENT

In relation to a Planning Application at:

Land adjacent to Batford Mill, Lower Luton Road, Harpenden, Hertfordshire

Compiled by:
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January 2020

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6.0 Arboricultural Impact Assessment (AIA)

6.1 As stated above British Standard recommendations (BS5837: 2012) provides a formula for calculating the Root Protection Area (RPA) recommended to protect existing trees that are to be retained. The shape of the root protection area and its exact location will depend upon arboricultural considerations but the area will normally be represented on a plan as a circle. The purpose of the RPA is to prevent physical damage to tree roots and to prevent damage to the soil structure in which they live by soil compaction, changes in soil levels or prevention of gas exchange to living roots.

6.2 These RPAs are shown on the Tree Protection Plan (TPP/LBMLLRHH/010 A) which also form part of the Arboricultural Method Statement. Where incursion within the RPA of a retained tree is necessary as part of the construction process then a methodology will be in place to prevent, or reduce to an insignificant level, damage to trees.

6.3 Below I have discussed the significance of the trees and the constraints that they are likely to pose to the proposed development (and vice-versa). Together with the Arboricultural Survey the AIA sets out any tree works required in order to facilitate the development as well as identifying works to trees (including removal) that should be undertaken as part of the management of trees on the site.

6.4 Summary of Tree Impact Assessment

6.5 There are 7 no. individual trees and 5 no. groups of trees which form the basis for this report and which could potentially be affected by the proposals.

6.6 Trees recommended for removal for Arboricultural Reasons

Of the trees within this report none are recommended for immediate removal irrespective of this Planning Application. However it is recommended to undertake the phased and planned removal of the mature Poplars which form the major tree species within the site. These trees are known to be subject to unpredictable branch and stem failure as they reach maturity as they develop brittle wood. The phased removal of these trees over the next 20 years is therefore recommended regardless of this Planning Application as part of reducing potential risks to users of the area. This would be undertaken following a further assessment of the trees and initially removing those that are considered most likely

to fail and subsequently removing the remaining trees. Some could be felled and retained on the site as a wildlife resource as log piles. It is noted that Poplars have previously (recently) failed on the site.

6.7 These are mature trees of a similar age range. The phased removal of these trees will reduce the potential visual impact of the trees being removed on mass as they all reach the end of their natural life span. The planting of replacement species would be undertaken to maintain and improve the visual amenity of the area and introduce a more varied and natural character to the site. The phased planting of these trees would also introduce a varied age structure within the tree stock. The species chosen would be native species such as Black Poplar (Populus nigra subsp betulifolia), Alder (Alnus glutinosa), Crack Willow (Salix fragilis), White Willow (Salix alba). Grey Poplar (Populus alba) and Aspen (Populus tremula). The use of these varied species would also improve the biodiversity of the site and could be associated with the overall management of the site to improve biodiversity. The planned removal also allows for the trees to be removed when they retain some strength in the timber reducing the risks to the contractor who would have to remove the trees. All works to remove the Poplars would need to be approved in writing by the LPA due to their protected status. The initial schedule could be agreed with the LPA in tandem with this planning application.

6.8 Schedule of trees recommended for removal for Arboricultural Reasons

Tree No.	Species (Common Name)	BS Category	Reason for recommended removal

None

6.9 Trees removed due to the application

Of the trees within this report none will need to be removed, or are proposed to be removed, as part of the implementation of the development.

6.10 Schedule of trees removed due to the application

Tree No.	Species (Common Name)	BS Category	Reason for removal

None

6.11 Trees potentially affected by the application

Site access will take place within or adjacent to the RPAs of retained trees. Additionally the installation of hardstanding and the repair or replacement of existing boundary treatments could take place within or adjacent to the RPAs or canopy spreads of retained trees.

6.12 These potential impacts are set out and evaluated below and measures to prevent, or reduce, the effects of the proposals on these trees are set out in the Arboricultural Method Statement. The impact on retained trees from this development will not be significant as long as the proposals set out in this report are followed.

6.13 Schedule of trees potentially affected by the application

Tree No.	Species (Common Name)	BS Category	Reason for potential impact
T6	Poplar	C2	• Site access within RPA.
T7	Poplar	C2	• Site access within RPA and canopy spread.
G2	9 no. Poplar	C2	• Installation of `no dig' surfacing within asymmetrical RPAs.
G3	3 no. Poplar	C2	• Installation of `no dig' surfacing within asymmetrical RPAs.
G4	11 no. Poplar	C2	• Installation of `no dig' surfacing within asymmetrical RPAs.

6.14 Assessment of potential impacts on retained trees

6.15 Assessment of Distribution of Roots of Trees

As set out above the RPAs have been calculated as part of the Arboricultural Survey. The shape of the RPA and its exact location will depend upon arboricultural considerations but the area will normally be represented on a plan as a circle. Pre-existing site conditions – such as building footprints, hard surfacing and changes in levels - or other factors may indicate that rooting has occurred asymmetrically.

6.16 With regard to the retained trees within this report there are potential restrictions on the root activity of trees due to the presence of the River Lee (see Photograph C). The physical presence of this water body will prevent any significant root growth in this area and will contain and restrict the rooting activity of these trees within the application site. Asymmetrical RPAs are therefore shown for these trees to present the reasonable and potential worse-case scenario for these trees.

Photograph C – Showing Poplars adjacent to River Lee which will restrict the root activity of these trees

6.17 Site Access

During the site development access will be from the existing access point from Batford Mill. This is within the RPAs of trees – Poplars (T6-T7). Therefore Ground Protection Measures are proposed as part of this element of the development.

6.18 Demolition and Construction within RPAs

No buildings or structures will be demolished or erected within the RPAs of trees.

6.19 Removal of Hard Standing within RPAs

There is no hardstanding within the application site.

6.20 Installation of Hard Standing within RPAs

New areas of hardstanding are proposed within the RPAs of retained TPO Poplars (T6-T7 and G2-G4). Any construction or excavation for this hardstanding has the potential to damage the roots of these trees through root severance or the compaction of soils. This would affect the potential stability and vitality of these trees. It is therefore proposed to introduce specialised construction techniques in the form of a `no dig' surface to avoid unnecessary damage within the rooting area. Also it is noted that care must be taken during the works to ensure that retained trees are not damage. These measures are set out in the Arboricultural Method Statement.

6.21 Construction Activity

Uncontrolled construction activity could lead to direct or indirect damage to trees - both above and below ground. Therefore Tree Protection Fencing is proposed within the Arboricultural Method Statement to restrict and control construction activity, contain the development footprint and protect retained trees during the works.

6.22 Activity associated with the Demolition and Construction Phases may take place within the RPAs of trees. This may involve vehicle movements within the proposed site access. It is therefore proposed that specific and suitable Ground Protection Measures are used during the development to protect the soil and rooting areas of trees. These measures are set out within the Arboricultural Method Statement.

6.23 Canopy Spreads and Presence of Trees

The canopies of the majority of the trees are not affected by the proposed development. However some minor tree works may be required to Poplar (T7) to crown lift this canopy above vehicles using the proposed access. This will crown lift the edge of the canopy from

1.5 m up to approximately 3.0 m above ground level. These are assessed to have an insignificant impact on the long term viability and amenity value of this tree. Initial tree works are specified in the Arboricultural Method Statement.

6.24 All proposed pruning works would follow guidance set out in the relevant British Standard (BS 3998:2010 - `Tree work - Recommendations') and will be carried out by a qualified tree surgeon/arboricultural contractor to ensure that the health, amenity and viability of the trees is maintained. All Arboricultural works should also comply with relevant bio-security measures – such as those set out in the Arboricultural Associations position statement `Biosecurity in Arboriculture and Urban Forestry'.

6.25 Shading

The use of the site as a car park will mean that shading will not be an issue for the proposals.

6.26 Levels

No ground level changes are currently proposed or should take place within the RPAs of retained trees except any discussed and assessed within this report.

6.27 Herbicides and Pesticides

The use of herbicides and pesticides is not proposed within the RPAs of retained trees as part of this application. Should this change then chemicals will be specified which will not have an impact on retained trees.

6.28 Utility Routes

No service routes are currently proposed as part of the planning application.

6.29 Temporary Site Buildings and Storage of Materials and Plant

Poor placement of temporary site buildings (including latrines), contractors parking, materials and plant can lead to direct damage to retained trees or indirect damage such as through the compaction of soils. The layout and operation of the site has therefore been considered and planned at this early stage to reduce or prevent any potential and significant damage to retained trees. This includes the erection of Tree Protective Fencing as set out above and in the Arboricultural Method Statement.

6.30 Erection of Boundary Treatments

New or replacement boundary treatments (fences) may take place within the RPAs of trees in order to define and secure the site boundaries. These are considered to be minor and insignificant to the long term retention of these trees. However they must be undertaken in a controlled and planned way to ensure that these trees are not damaged by the works. A specification for the installation of these is set out in the Arboricultural Method Statement.

6.31 End Use of the Proposal

The proposals will be used as a car park at the end of the project.

7.0 Recommendations

7.1 All tree works – pruning – should be undertaken prior to the start of the site development so as to avoid any conflict between trees and contractors during the implementation of the project.

7.2 Existing trees can be easily damaged directly through root severance and, inadvertently, through soil compaction which disrupts the soil structure causing asphyxiation of roots and subsequent root dysfunction. Spillage of toxic materials can also cause root death. Protection for trees selected for retention is essential to ensure they are not affected by the development.

7.3 Specifications for the protection of trees are proposed in the Arboricultural Method Statement. These include the use of Tree Protection Fencing and Ground Protection Measures and should be implemented to prevent, or limit, any significant damage to the roots of trees. Protective fencing should be erected as shown on the Tree Protection Plans.

7.4 The phasing of the operations should follow that set out in the Arboricultural Method Statement to ensure that the protection of trees is prioritised.

7.5 An Arboriculturist should be the main contact with the Local Authority Tree Officer and notify them of the proposed schedule prior to work commencing on site. Where necessary Arboricultural Supervision of the site should be undertaken on a schedule to be agreed with the site owner.

David Clarke Chartered Landscape Architect and Consultant Arboriculturist Limited

David Clarke BSc (Hons) PD Arb (RFS) M Arbor A CMLI

ARBORICULTURAL METHOD STATEMENT

In relation to a Planning Application

at:

Land adjacent to Batford Mill, Lower Luton Road, Harpenden, Hertfordshire

Compiled by:
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January 2020

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8.0 General

8.1 This document sets out the methodologies for proposed works that affect trees on, and adjacent to, the site. These follow the granting of Planning Permission by the Local Planning Authority. Compliance with this (and subsequent) method statement(s) will be a requirement of all relevant contracts associated with the development proposals. Copies of this document will be available for inspection on site. The developer will inform the local planning authority if the arboricultural consultant is replaced. This method statement should be read in conjunction with Tree Protection Plan (TPP/LBMLLRHH/010 A).

9.0 Phasing of the Works

9.1 The works are proposed to be undertaken in the following phases:

- Pre-Development Works
  Confirm temporary site structures (latrines), contractors parking and storage areas can be accommodated outside the Construction Exclusion Zones or on suitable Ground Protection Measures prior to start of the site development. Ensure these will be located so that they do not have to be relocated during the development – or that any change is minimal - thereby avoiding unnecessary vehicle movements on site.

- Undertake pre-development tree works: pruning of Poplar (T7).

- Confirm the weight loadings that will be entering the site and specify the type of materials that will need to be laid as Ground Protection Measures to the site access.

- Construction Phase
  Confirm Tree Protection Fencing is in place and `fit for purpose' prior to the start of the Construction Phase. Confirm installation of Ground Protection Measures prior to the start of the Construction Phase.

- Place temporary site structures - such as latrines – contractors parking and storage areas outside the Construction Exclusion Zones or on Ground Protection Measures.

- Commence Construction Phase.

- Undertake regular monitoring of the Tree Protection Measures to ensure they remain fit for the purpose of preventing unnecessary damage to trees. Should any unforeseen damage occur then this should be reported to the Local Planning Authority. Remedial tree surgery should be undertaken at the earliest opportunity as approved by a competent and qualified Arboriculturist.

- Completion of Construction Phase and removal of any temporary site structures and stored materials.

- Removal of Tree Protection Fencing and any temporary Ground Protection Measures.

- It is advisable to carry out a further tree survey to identify any remedial trees surgery that may be required following the completion of the development. This will include any changes in the condition of the trees that may have occurred from the original survey.

10.0 Construction Site Access

10.1 The access for construction site vehicles and contractors will follow the Designated Access Route which is from the existing access point from Batford Mill. This is within the RPAs of Poplars (T6-T7). Therefore ground protection measures are required as part of this element of the development (see `Ground Protection Measures' below).

11.0 Pre-Development Tree Works

11.1 (i) Crown Lifting – Poplar (T7)

Where required it is proposed to crown lift this tree by up to approximately 1.5 m over the proposed access. These works will be undertaken before the start of the Construction Phase to avoid any potential conflict with contractors. This will ensure an adequate and harmonious separation between the tree canopy and the proposals.

11.2 Crown lifting will not result in the removal of more than 15% of the live crown height and the remaining live crown will make up at least two-thirds of the height of the tree. It will involve the removal of secondary branches or branch shortening rather than removal of branches back to the stem. The amount of material to be removed and the diameter(s) of the pruning cut(s) will be the minimum required for the purpose.

11.3 All proposed pruning works would follow guidance set out in the relevant British Standard (BS 3998:2010 - `Tree work - Recommendations') and will be carried out by a qualified tree surgeon/arboricultural contractor to ensure that the health, amenity and viability of the trees is maintained. All Arboricultural works should also comply with relevant bio-security measures – such as those set out in the Arboricultural Associations position statement `Biosecurity in Arboriculture and Urban Forestry'.

12.0 Tree Protective Fencing

12.1 Root Protection Areas (RPAs) are the minimum areas (in m^2) which should be left undisturbed around each retained tree as Construction Exclusion Zones. These areas have been calculated as part of the Arboricultural Survey. The protective distances where possible will be enforced by the use of robust protective fencing as outlined in BS 5837: 2012. The fencing will be fit for the purpose of excluding construction activity and appropriate to the degree and proximity of work taking place around the trees.

12.2 In this instance it is proposed to use the following methods:

- 2.0 m high metal mesh panels within the site. Examples would include Heras fencing (See Photograph D below). The panels will be joined together using a minimum of two anti-tamper couplers to prevent access except for maintenance operations. The distance between the fence couplers will be at least 1.0 m and they will be uniform throughout the fence. Where space does not allow for a full panel to be erected then panels may overlap each other to fill a gap. The panels should be supported on the inner side by stabilizer struts, which should normally be attached to rubber blocks. Where required the site the panels will be staked and secured in place so that they do not move during the development process. Dust' netting will be fixed to the fencing to prevent airborne material generated during the site development from coating the leaves of trunks of trees.

12.3 The exact composition of the soil is unknown. Clay soil, for instance, compacts very easily when wet, so it is essential that fenced areas remain undisturbed before and during construction to prevent root asphyxiation.

Photograph D – Example of Heras Tree Protective Fencing

12.4 Laminated site warning signs will be attached to the fencing. These signs will state:

'CONSTRUCTION EXCLUSION ZONE – NO ACCESS

No storage of materials or use of machinery should take place within this area. These fences should remain intact unless under instruction from the site foreman following consultation with an Arborist.'

12.5 Tree Protection Fencing will be erected to protect retained trees before any machinery or pedestrians enter the site in connection with the Construction Phase. The position of the fencing is shown on Tree Protection Plan (TPP/LBMLLRHH/010 A). Fencing will not be removed or relocated – except to allow for grounds maintenance operations - until the development is complete.

13.0 Ground Protection Measures

13.1 Activity associated with the Construction Phase may take place within the RPAs of Poplars (T6-T7). This may involve vehicle movements (site access). It is proposed that specific and suitable Ground Protection Measures are used during the development to protect the soil and rooting areas of these trees. The protective fencing specified will be erected as shown on Tree Protection Plan (TPP/LBMLLRHH/010 A) as part of the development. The following specifications will then be used:

13.2 Vehicle Movements (Site Access)

Construction Phase

Suitable Ground Protection Measures will be installed as proposed below:

(a) It is assumed that some construction machinery entering the site may exceed 2 t gross weight. A system will therefore be proposed to an engineering specification designed in conjunction with arboricultural advice. This system could include a proprietary system such as heavy duty metal or plastic trackway panels which will accommodate the likely loading to which it will be subjected. The structure of this temporary surface will be designed to avoid localised compaction, by evenly distributing the carried weight over the track width or wheelbase of any machinery that is proposed to use the area. In this instance the final design of the system used would be confirmed in association with the relevant contractor as part of a Planning Condition for a Planning Approval.

13.3 The Ground Protection Measures will be in place prior to any vehicles entering the site in connection with the site development. Measures will only be removed once the Construction Phase is complete and construction movements connected with the site development have ceased.

14.0 Installation of Hardstanding - `No Dig' Surfacing – Poplars T6-T7 and G2-G4

14.1 This will be a permeable surface laid to protect the rooting areas of these trees. A Terram 1000 geotextile membrane and a 150mm deep Erocell 25/15 Geocell containment grid with block paving or gravel on top (to a maximum total depth of approximately 215 mm) are proposed. An indicative example is given in Photograph E. The surface will therefore have a limited impact upon retained trees.

14.2 The surfaces would be constructed from outside the RPAs using the laid surfacing for support to prevent damage to RPAs during the works. The ‘no dig’ approach may continue outside the RPAs of retained trees or revert to a standard construction. This will, in part, depend on levels within the site. Care will be taken during the works to prevent compaction of soils and therefore to ensure that roots are not damaged.

Photograph E – Geo Cell with gravel infill.

15.0 Site Organisation and Storage of Materials and Plant

15.1 During the proposed construction works attention will be paid to the protection and well being of retained trees. The site will be organised in such a manner so as to minimise the effects of the construction work on trees. This will include defining and containing the development footprint with Tree Protection Fencing. All movements within the RPAs of trees will take place on Ground Protection Measures.

15.2 All materials and plant to be used during, or generated by, the Development Phase will be stored outside the enforced tree protection areas or on Ground Protection Measures. The operation of the site will be undertaken within the constraints imposed by the protection of trees. Where necessary materials will be brought to site in loads which are applicable to that phase of the works. Large loads may be dropped at `kerb' side of Batford Mill and moved into the site by forklift or other means. This would help to minimise the development footprint within the site.

15.3 All toxic substances such as oils, bitumen's and residues from concrete mixing will be retained by effective catchment areas. No toxic material will be discharged within 10 m of a tree stem. No fires will be lit within 10 m of a tree stem.

15.4 All access onto and from the site will be via the Designated Access Route. Temporary latrines and any other temporary structures will be outside the Construction Exclusion Zones or on Ground Protection Measures.

16.0 Erection of Boundary Treatments

16.1 Existing fencing may be repaired or replaced as part of the proposed development to form defined site boundaries.

16.2 Care will be taken when digging new holes and these will be undertaken by hand within these RPAs. Where roots larger than 25 mm are encountered the post hole (where possible) will be moved to ensure the roots are not affected. Where it is not possible to move the post hole roots larger than 25 mm will only be severed following consultation with an Arboriculturist, as they may be essential to the tree's health and stability. Roots smaller than 25 mm may be pruned back to create a clean cut, preferably to a side branch, using a proprietary cutting tool such as bypass secateurs or handsaws.

16.3 Roots which are exposed, but are to be retained, will be wrapped in dry, clean hessian sacking to prevent desiccation and to protect from rapid temperature changes. Prior to backfilling, any Hessian wrapping will be removed and retained roots should be surrounded with sharp sand or other loose granular fill, before soil or other material is placed over the roots. This material should be free of contaminants and other foreign objects potentially injurious to tree roots.

16.4 At this point it is recommended that these treatments are erected at the end of the Construction Phase when the majority of construction works have occurred. Tree Protection Fencing will be removed whilst this element of the work is carried out.

17.0 Conclusion

17.1 The application is for the installation of an overflow car parking area using the existing access point'.

17.2 Of the trees within this report none are recommended for immediate removal irrespective of this Planning Application. However it is recommended to undertake the phased and planned removal of the mature Poplars within the site over the next 20 years. This species are known to develop brittle wood as they mature and become a potential hazard to users of the area. The proposed works would remove this hazard and introduce replacement native planting to improve the biodiversity and species variety on the site.

17.3 As part of the implementation of the development no trees will need to be removed.

17.4 There will be incursions within, or adjacent to the RPAs and canopy spreads of trees as part of the development of the site. These include for site access and installation of hardstanding. Overall the incursions within the RPAs have been assessed within the Arboricultural Impact Assessment to either have a minimal and insignificant impact on retained trees or can be reduced to an insignificant level through the use of relevant construction techniques. These are set out within the Arboricultural Method Statement. These will ensure that the development will be completed without having any undue impact on retained trees.

17.5 Retained trees will be protected during the site development. This report sets out how retained trees are an important part of the development of the site and how protection and retention of trees will be achieved. The effect on retained trees from the proposals will be minimal given the proposed site layout and conditions and providing that the Arboricultural Method Statement is implemented.

17.6 The development is therefore acceptable in arboricultural terms and should receive planning consent.

Appendix A
Arboricultural Survey
Land adjacent to Batford Mill, Lower Luton Road, Harpenden, Hertfordshire

1.0 Introduction

1.1 I visited the application site in January 2020 to inspect relevant trees in relation to a Planning Application on the site. These trees are within the area of the proposed development and may potentially have some significance to the proposed development. The survey includes the species, size, position and condition of these trees. A full list and description of Survey Terms is given below. The position of these trees has been noted on the accompanying Tree Protection Plans.

1.2 This survey has been prepared following guidance set out in BS 5837: 2012 `Trees in relation to design, demolition and construction. Recommendations'. It seeks to offer guidance in relation to planning application discussions or designs for the site. As suggested by BS5837: 2012 all trees with a stem diameter of less than 75 mm at 1.5 m above ground level were excluded from the survey.

2.0 Description of Survey Terms

2.1 **Tree Reference Number** is the number allocated as part of this Arboricultural Survey. This may be different from other surveys undertaken on the site and the tree may, or may not, be tagged on site.

2.2 **Height** of the tree is measured in metres to the centre of the crown or the highest point of the tree. There is a tolerance of plus or minus 1.0 m.

2.3 **Crown Spread** is taken at compass points N, E, S and W from the centre of the tree stem. This is to the nearest 0.5 m. Where tree canopies spread off-site then estimations (est) have been made. With regard to groups the average canopy spread is given. Where individuals within the group are significantly different from this these are shown on the plan and the maximum spread stated within the report.

2.4 **Stem Diameters** are taken at 1.5 m above ground level unless otherwise stated. Where measurements of trunk diameter are not possible then estimations (est) have been made. This may be due to ivy on the trunk or where trees are not on the application site. The annotation ms refers to multi-stemmed trees.

2.5 **Root Protection Areas** (RPAs) are calculated from stem diameter measurements as set out in BS5837: 2012 `Trees in relation to design, demolition and construction. Recommendations'. RPAs are the areas (in m^2) around each retained tree which contain sufficient rooting volume to ensure the survival of the tree. The area will normally be represented on a plan as a circle or polygon. If shown as a circle the **Radius of Root Protection Area Zone** is included.

2.6 **Age Class** - A young tree (Y) is within its first 1/3rd of life expectancy. A middle aged tree (MA) is within its second 1/3rd of life expectancy and a mature tree (M) is within its final third of life expectancy. An Over Mature tree (OM) is beyond its average life expectancy and a Veteran (V) is usually beyond the typical age range for the species but of biological, cultural or aesthetic value.

2.7 **Physiological and Structural Condition** - Trees in a Good Physiological or Structural Condition have no visible problems or significant defects. Those in a Fair Condition have remedial symptoms or defects or where these symptoms or defects are not remedial but will not affect the **Estimate Remaining Useful Contribution** and those in a Poor Condition have defects which are not remedial and removal of the tree should be considered.

2.8 **Comments** give a description of the tree including its general form, description of any physical defects, disease or decay and other appropriate details based on the health, vitality and overall structural integrity. It also includes the environment in which the tree is growing. **Recommendations** for the management of the tree or group will be given where required. These relate to the trees in their current situation without any proposed development taking place. Any proposals for removal of trees will need to be agreed with the tree owner.

2.9 A tree of good form has a shape that is typical of the species or has amenity in its own right. A tree with moderate form has been affected by its environment and is not typical of the species and has limited amenity value on its own right though it may have a collective amenity with adjacent trees. A tree with poor form has low quality and may also have structural defects which will affect its long term retention. **Canopy height above ground level** is given where this is applicable.

2.10 **Estimated Remaining Useful Contribution** is the estimated number of years that the tree will continue to make a safe and useful contribution to its surroundings, taking into account its current age, physiological and structural condition and its current location or environment. This assumes that there will be no changes within its immediate environment.

2.11 **Category Grading** - trees have been categorised in accordance with the cascade chart set out within BS5837: 2012 `Trees in relation to design, demolition and construction. Recommendations'.

2.12 The trees inspected as part of this report were inspected from the ground only. No samples were taken for analysis. Observations were confined to what was visible from within the site and surrounding public places. A full hazard risk assessment of the trees was not undertaken.

Photograph F – Showing damage to a Poplar in G2.

Tree Schedule

Tree Ref No.	Species Common Name (Scientific Name)	Height (m)	Stem Diameter (mm) ***Root Protection Area (m^2)***	Radius of Root Protection Area zone (m)	Branch Spread (m)	Age Class	Physiological/ structural Condition	Comments ● Preliminary Management Recommendations within Current Environment	Estimated Remaining Useful Contribution (years)	Category Grading
T1	Poplar (Populus nigra spp)	16	250 est **28.3**	3.0	N – 1.5 E – 1.5 S – 1.5 W – 1.5 all est	Y	Fair/Fair	Growing to edge of river bank. Moderate form. • No preliminary management recommendations at time of survey.	10+	C1
T2	Hawthorn (Crataegus spp)	6	212 est (2 x 150 mm diameter stems) **20.3**	2.5	N – 2.0 E – 2.0 S – 2.0 W – 2.0 all est	Y	Fair/Fair	Growing on bank to River Lee. • No preliminary management recommendations at time of survey.	10+	C1
T3	Goat Willow (Salix caprea)	8	250 est (1 x 150 mm and 1 x 200 mm diameter stems) **28.3**	3.0	N – 2.5 E – 2.5 S – 2.5 W – 2.5 all est	MA	Fair/Poor-Fair	Lifted at root plate and crown partly collapsed to south-east. 1 no. limb failed to south-east and lying on the ground. Covered in ivy – full inspection of tree not possible. • Remove failed and damaged limbs and manage to promote reestablishment of stable rooting area.	10+ (depending on future management)	C1
T4	Goat Willow (Salix caprea)	8	461 est (1 x 300 mm and 1 x 350 mm diameter stems) **96.2**	5.5	N – 5.0 E – 3.0 S – 6.0 W – 3.0 all est	M	Fair/Poor-Fair	Collapsed to north with 1 no. main limb lying on the ground. Dead wood present. • Remove failed and damaged limbs and manage to promote reestablishment of tree from retained trunk.	10+ (depending on future management)	C1

T5	Poplar (Populus nigra spp)	20	640 **185.3**	7.7	N – 2.5 est E – 2.0 S – 2.5 W – 1.5	M	Fair/Fair	Growing to site boundary. Upright form. Damage and dead wood in the crown. Thinning canopy. Crown weighted to north and south. • Monitor condition of tree as part of a regular tree risk survey on the site. These trees are known to have the potential for unpredictable failure as they reach maturity due to the brittle nature of the wood. Consider planned removal and replacement with suitable species within 5-10 years to remove potential risks to users of the area.	10+	C1
T6	Poplar (Populus nigra spp)	22	840 est **319.2**	10.1	N – 2.5 est E – 2.5 S – 2.5 W – 2.0	M	Fair/Fair	Growing to site boundary. Upright form. Damage and dead wood in the crown. Thinning canopy. Previously pruned. One sided to west. Top heavy crown. • Monitor condition of tree as part of a regular tree risk survey on the site. These trees are known to have the potential for unpredictable failure as they reach maturity due to the brittle nature of the wood. Consider planned removal and replacement with suitable species within 5-10 years to remove potential risks to users of the area.	10+	C1
T7	Grey Poplar (Populus alba)	14	500 est **113.1**	6.0	N – 5.5 E –5.0 S – 5.5 W – 5.5 all est	M	Fair/Fair	Offsite tree growing adjacent to existing parking area. Previously topped. Canopy below 1.5 m above ground level over the site. Previously pruned. Moderate form. Large limb removed to base. • Monitor condition of tree as part of a regular tree risk survey on the site. These trees are known to have the potential for unpredictable failure as they reach maturity due to the brittle nature of the wood. Consider planned removal and replacement with suitable species within 5-10 years to remove potential risks to users of the area.	10+	C1

Tree Ref No.	Species Common Name (Latin Name)	Height (m) range	Stem Diameter (mm) **Root Protection Area (m^2)** *Radius of Root Protection Area zone (m)*	Branch Spread - general (max) **(m)**	Age Class (general)	Physiological/ Structural Condition (general)	Comments (general) ● Preliminary Management Recommendations	Estimated Remaining Useful Contribution (years)	Category Grading
G1	2 no. Poplar (Populus nigra spp)	28-30	600 – 640 **162.9 – 185.3** *7.2 – 7.7*	N – 1.0 (1.5) E – 1.5 S – 2.5 W – 2.5 (5.0)	M	Fair/Fair	Growing as part of a line of Poplars along River Lea. Upright form. Crowns weighted to west including some extended lateral branches. Some dieback and deadwood in the crowns – thinning canopies. 1 no. tree growing on small `mound'. Elder growing to base of 1 no. tree. Canopies generally to above 3.0 m above ground level at lowest point. • Monitor condition of trees as part of a regular tree risk survey on the site. These trees are known to have the potential for unpredictable failure as they reach maturity due to the brittle nature of the wood. Consider planned removal and replacement with suitable species within 5-10 years to remove potential risks to users of the area.	10+	C2

G2	9 no. Poplar (Populus nigra spp)	30	660 – 980 **197.1 – 434.5** *7.9 – 11.8*	N – 2.0 (2.5) E – 1.5 (2.5) S – 2.0 (3.5) W – 1.5 (3.0)	M	Fair/Fair	Growing as part of a line of Poplars along River Lea. Upright form. Basal growth to trees to eastern end of the group. Small wound to tree within tree to centre of the group – full inspection not possible due to presence of ivy. 2 no. trees to western end of group appear to be most vigorous of the group. Damage in crowns and lost leader to tree third from western end of group. Crowns affected by presence of adjacent trees. Some dieback and deadwood in the crowns – thinning canopies. Some trees are covered in ivy – full inspection of these trees is not possible. Some trees have open canopies. Canopies generally to above 3.0 m above ground level at lowest point. • Monitor condition of trees as part of a regular tree risk survey on the site. These trees are known to have the potential for unpredictable failure as they reach maturity due to the brittle nature of the wood. Consider planned removal and replacement with suitable species within 5-15 years to remove potential risks to users of the area. Initial removal would be those assessed as most likely to fail.	10+	C2

G3	3 no. Poplar (Populus nigra spp)	26	700 est – 800 est **221.7 – 289.6** *8.4 – 9.6*	N – 2.0 E – 2.0 S – 2.0 W – 2.0 all est	M	Fair/Fair	Growing as part of a line of Poplars along River Lea. Covered in ivy – full inspection of trees not possible. Upright form. • Monitor condition of trees as part of a regular tree risk survey on the site. These trees are known to have the potential for unpredictable failure as they reach maturity due to the brittle nature of the wood. Consider planned removal and replacement with suitable species within 5-10 years to remove potential risks to users of the area.	10+	C2
G4	11 no. Poplar (Populus nigra spp)	20-30	240 – 950 est **26.1 – 408.3** *2.9 – 11.4*	N – 1.5 (2.5) E – 1.0 (6.0) S – 1.5 (2.5) W – 1.5 (2.5) all est	MA-M	Fair/Fair	Growing as part of a line of Poplars along River Lea. Some trees are covered in ivy – full inspection of these trees not possible. Upright forms with generally narrow crowns. Damage to smallest tree at approximately 4.0 m height. The third tree from the northern end of the group has a lost leader. Elders are growing to the base of some trees. • Monitor condition of trees as part of a regular tree risk survey on the site. These trees are known to have the potential for unpredictable failure as they reach maturity due to the brittle nature of the wood. Consider planned removal and replacement with suitable species within 10-20 years to remove potential risks to users of the area.	10+	C2

G5	2 no. Hawthorn (Crataegus spp), 3 no. Field Maple (Acer campestre), 3 no. Beech (Fagus sylvatica) and 1 no. Maple (Acer spp)	4-12	100 est – 391 est (1 x 250 mm and 1 x 300 mm diameter stems) **4.5 - 69.2** *1.2 – 4.7*	N – 3.0 (4.5) E – 3.0 (4.5) S – 3.0 (5.0) W – 3.0 (6.0) all est	Y-MA	Good/Fair	Offsite trees growing closely together along fence line to site boundary. Full inspection of trees not possible. Ivy to trunks and into the crowns of some trees. • No preliminary management recommendations at time of survey.	10+	C2

Three Counties Flood Risk Assessment

MARGARET'S COTTAGE SANDHURST GLOUCESTER GL2 9NP TEL/ 01452 730818 email: david@three-counties-flood-risk-assessment.co.uk

FLOOD RISK ASSESSMENT

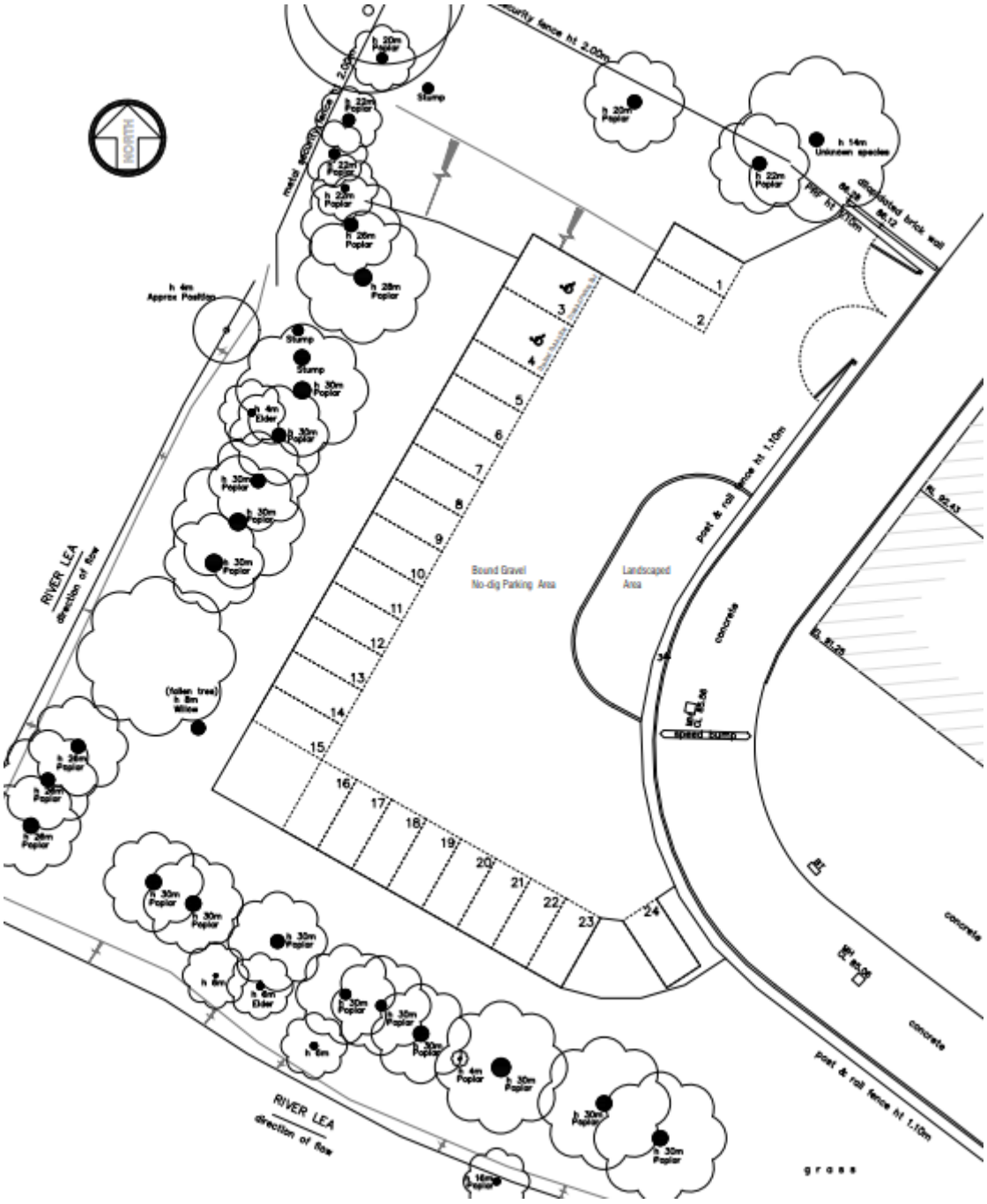
PROPOSED CAR PARKING AT :

Old Batford Mill Lower Luton Road, Harpenden AL5 5BX

Dated : 19 February 2020

GEOLOGICAL LOCATION

SITE PLAN



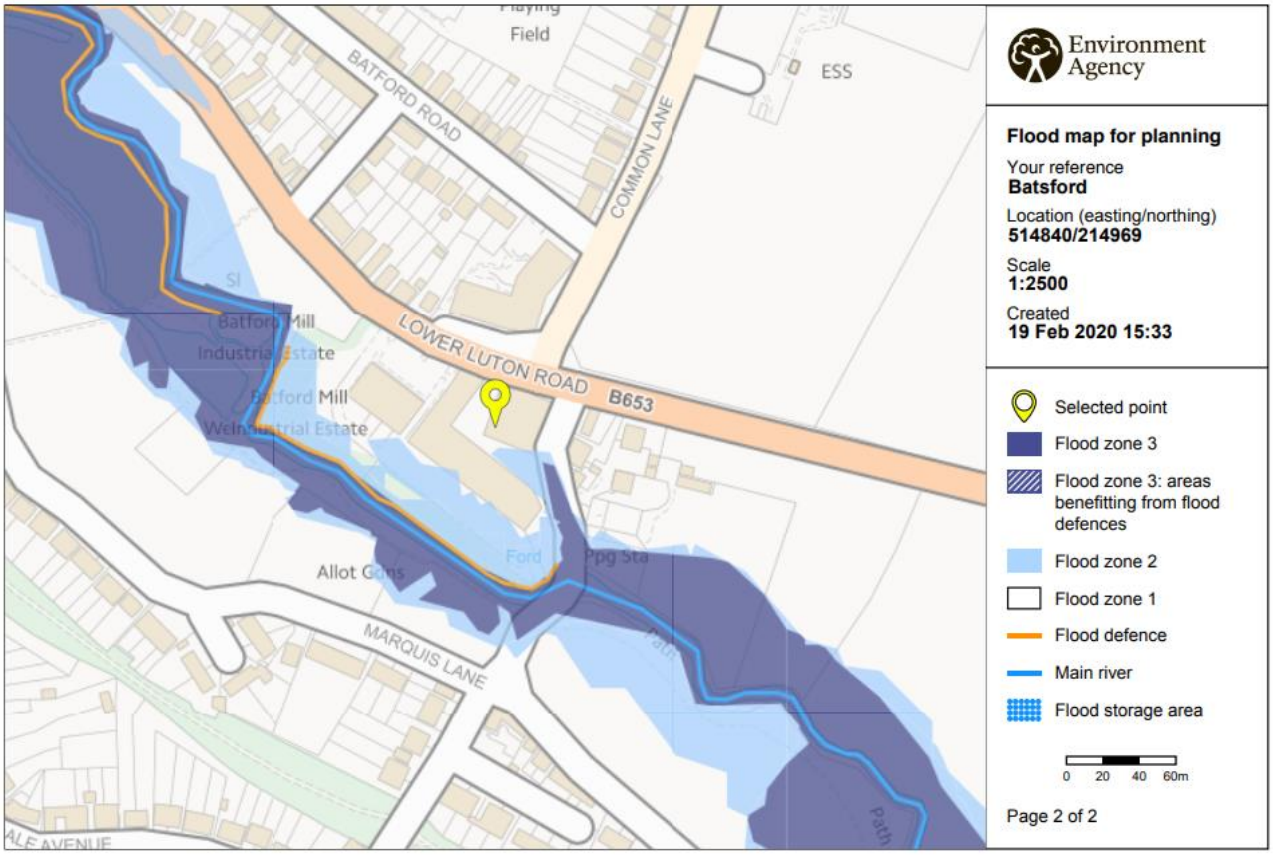
FOR 24 PARKING SPACES

Environment Agency

Flood map for planning

Your reference	Location (easting/northing)	Created
bATFORD	**514836/214969**	**19 Feb 2020 14:56**

Your selected location is in flood zone 1, an area with a low probability of flooding.



PROPOSED NEW PARKING AREA FOR 24 CARS AT THE OLD BATFORD MILL LOWER LUTON ROAD, HARPENDEN AL5 5BX

FLOOD RISK ASSESSMENT / DESK TOP STUDY

This report is compiled for a planning application. Detailed plans are supplied by the applicant within the application.

It is written under the criteria within the National Planning Police Framework (NPPF) and the Environment Agency (EA) Guidance notes to local authorities.

As shown above the proposal is to construct a parking area with 24 parking spaces.

The site is shown as being in Flood Zone 1 on the EA mapping. But under NPPF guidelines a very small part of the overall site is within Flood Zone 2 and the parking area should be treated as such. The supposed threat to the site is from the River Lea to the West of the site.

The overall site is not the subject of this FRA, just the parking area. However, we do not think it propitious to labour that point because the contents of this report will show that the parking area is allowable under all criteria. We will treat it as being in Flood Zone 2.

In these circumstances the car parking site would not qualify for the sequential test due to the nature of the development, it being largely within Flood Zone 1 and its history of being completely free from flooding.

During the past fortnight the whole country has been subject to horrendous flooding from the ferocious storms Carla and then Dennis. They have been said to be without equal in this and the last century. As I write this the threat still prevails.

On the 18th February a photographer was instructed to take pictures of the river running past the site. This was to be the peak of the flood pattern across the country. The pictures he took were interesting to say the least.

The pictured below shows the waters in the river at below bank level. The proposed area for the car park is nearly two metres above the river.

File info

Filename
IMG_5768 (002).JPG

Date taken

18	February	2020
9	55	

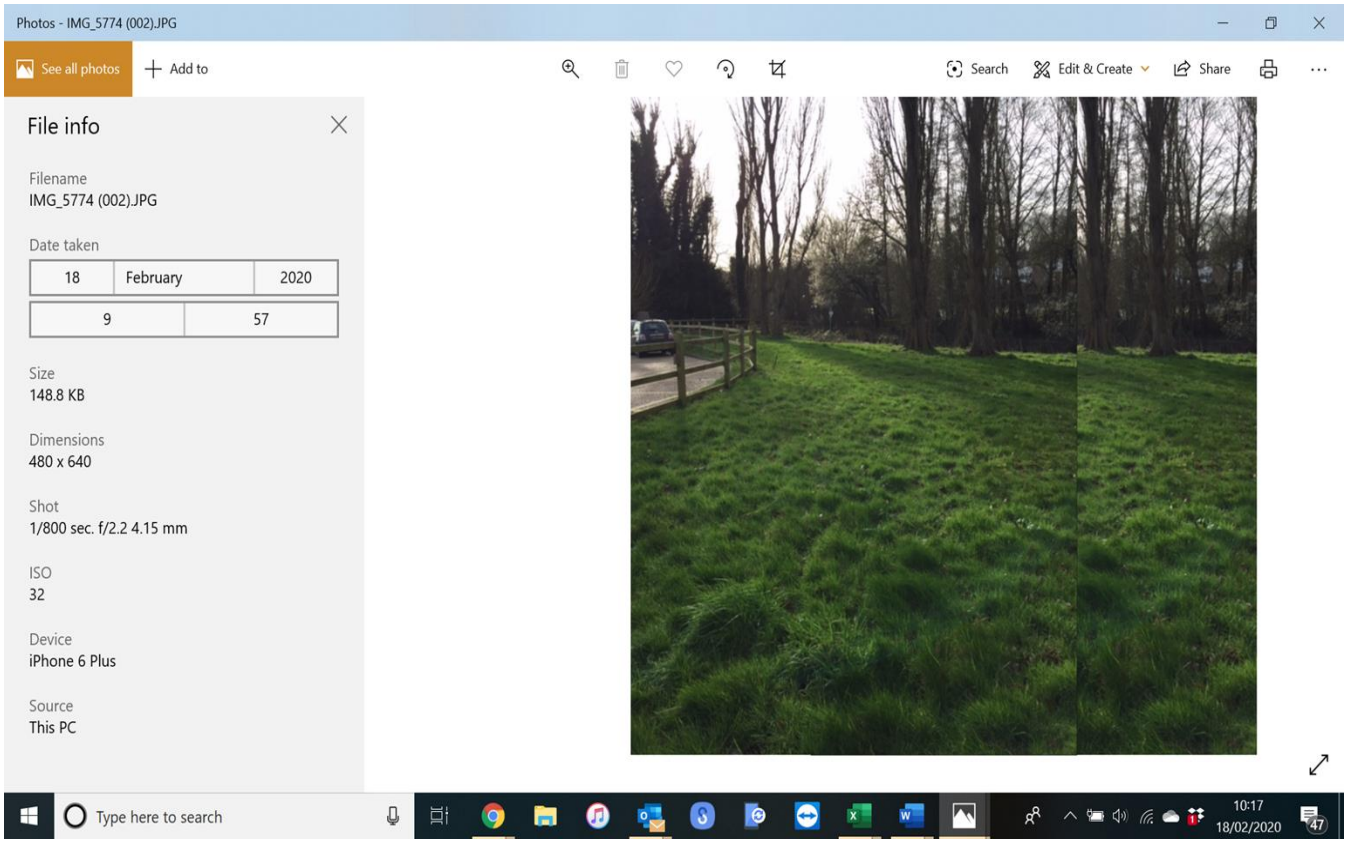
Size
144 KB

Dimensions
480 x 640

Shot
1/320 sec. f/2.2 4.15 mm

ISO
32

Another picture below shows the steep slope down to the river from the area that it is proposed to use as a car park



In the meantime householders across the country were being inundated by flood water.

This supports local anecdotal evidence that the watercourse has never threatened the site.

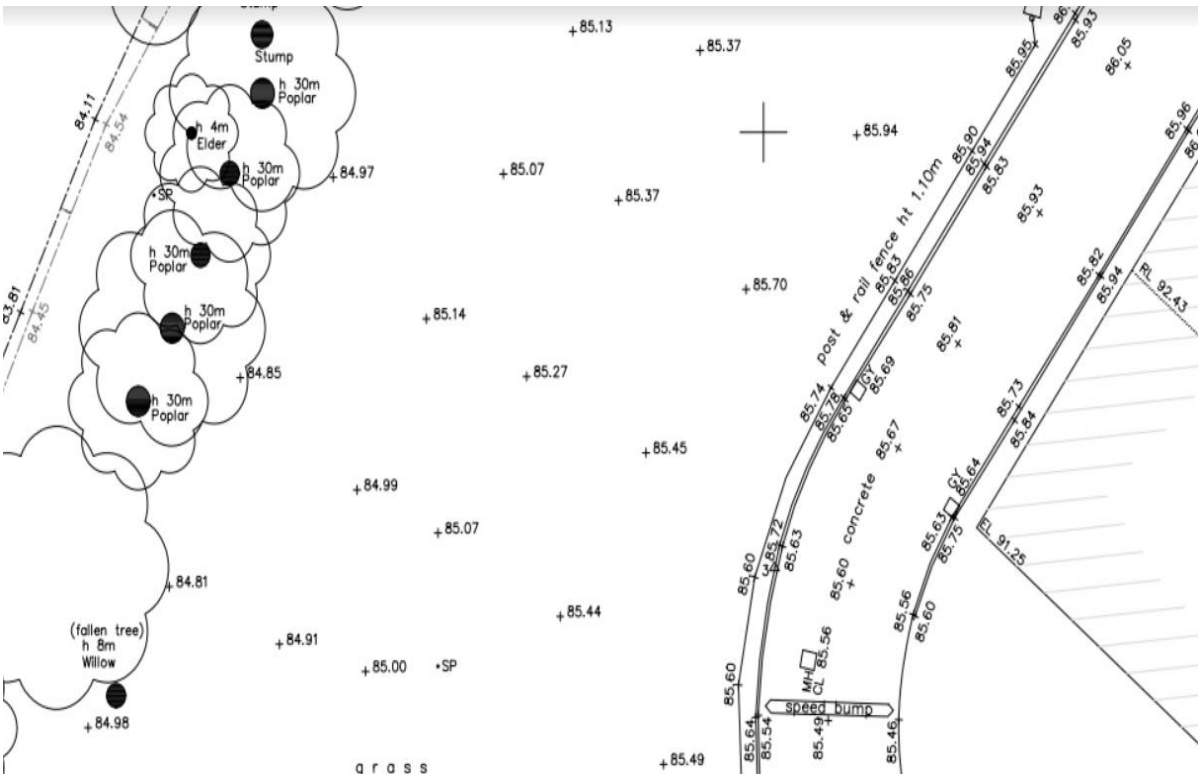
Flood Risk Classification

Within NPPF and LA guidelines there are a number of categories upon which a FRA should be composed. Car parking is not included in these categories, which is likely due to the nature of the development, the fact is does not contain any buildings and has limited flooding implications.

It is considered that in this case the threat to the site is less vulnerable and that under the criteria it should be considered a “minor development”. The two main criteria for a FRA is that the safety of users should be safe-guarded and that there should be no offsite implications to neighbours.

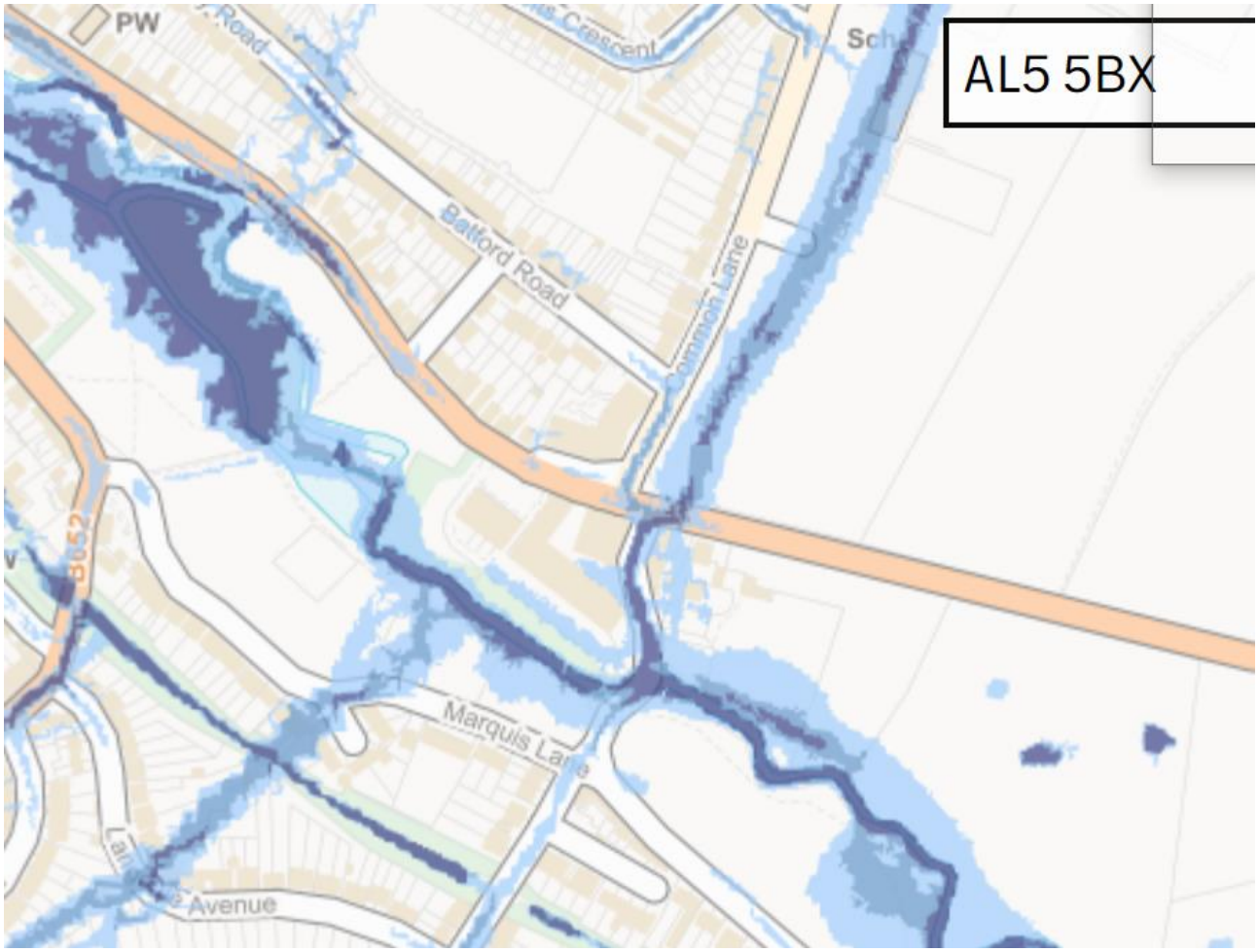
Neither of these apply in this case.

A topographic survey t AOD confirms how high above the water course the proposed parking area would be above the river and this is shown below

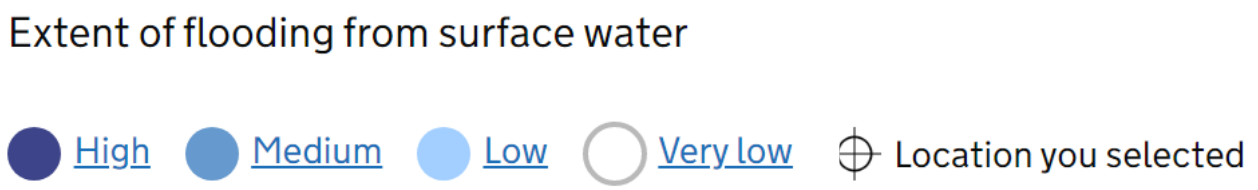


Surface Water Flooding

Mapping from the EA shows only a sliver of surface water to the rear of the site.



EA Legend



Other EA mapping shows this is below 300mm which is below the DEFRA guidance level for safe passage for pedestrians and vehicles alike.

Groundwater

BGS mapping shows sand and gravel below the ground with a mixture of clay with it.

Sustainable Drainage

At this time a drainage strategy is being prepared by the applicant. It is suggested that this is done in liaison with the LA to ensure that any surface water is treated on site before allowing it to be channelled into the waterway.

Vehicles parked for any length of time can drip corrosive elements such as oil onto the ground and this may lead to the ground under the site becoming contaminated. Measures should be taken to ensure this does not happen and this should be made a condition of the planning permission.

Offsite Implications

There will be none with the recommendations as made

Residual Risk

There will be no necessity for evacuation procedures from the evidence available.

There will also be no necessity for the car parking site to be a subscribe to the EA floodline initiative.

Flood Resilience Measures

There will be no requirement for these due to the location of the site and nature of the development.

Artificial Threat

A sweep of the area found none.

CONCLUSION

There is no reason to believe that during its sustainable lifetime this proposal will alter from a flood risk point of view. The site stands well above any risk of fluvial flooding as shown by the photographs. This is substantiated by the levels in the water course at the time of national inundation on a biblical scale.

Surface water could affect the rear of the site but only under low levels .

Recommendations have been made for sustainable drainage to avoid any chance of dirty water entering the watercourse as a result of this proposal and also to avoid any offsite implications.

With the recommendations as made this proposal meets all criteria within the NPPF and the EA advice notes to local authorities.

Signed

David Eggleton
Managing Director.

HT9

HELAA Reference (Internal use only)|

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	[redacted]
Email	[redacted]
Your interest	☐Site Owner X Planning Consultant ☐Registered Social Landlord ☐Local Resident ☐Developer ☐Community ☐Other

Site Details

Requirements:

- 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 North of Beesonend Lane, Harpenden			
Site area (in hectares)	6ha			
Coordinates	Easting	513114	Northing	211594
Site Location Plan Attached	X Yes ☐No			
GIS mapping shapefile attached (in .shp file format)	☐Yes X No			
Landownership (please include contact details if known)	[redacted]			
Current land use	Part agricultural, part residential			
Condition of current use (e.g. vacant, derelict)	Occupied			
Suggested land use	X Housing ☐ Gypsy & Travellers ☐ Mixed Use (please specify) ☐ Employment ☐ Renewable and low carbon energy and heat ☐ Biodiversity Improvement / Offsetting ☐ Green Belt Compensatory Land ☐ Land for Tree Planting ☐ Other (please specify)			
Reasons for suggested development / land use	Harpenden 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. The Beesonend Lane site was one of small-scale sub-areas identified by the Council's consultants as not fulfilling significant Green Belt roles in 2013 and should continue to be identified in the new Green Belt Review.			

	The exceptional circumstances needed to justify removal of the site from the Green Belt include the following: housing provision, which could be delivered quickly; the provision of older persons accommodation; and the site is identified in the Council's Green Belt Review.
Likely timescale for delivery of suggested development / land use	X 1-5 Years ☐ 6-10 Years ☐ 11-15 Years ☐ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes x No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes x No
	Flood Risk	☐ Yes x No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes x No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	x Yes ☐ No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	☐ Yes x No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	x Yes ☐ 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	x Yes (If yes, please specify) ☐ No There are no designations that would prevent development. Land on the south side of Beesonend Lane is included within the Childwickbury Conservation Area. There is also a number of Listed Buildings and Locally Listed Buildings on the south side of Beesonend Lane. However, these buildings will not prevent development and any impact can be mitigated through a sensitive layout and details.
Planning Status	☐ Planning Permission Granted ☐ Planning Permission Refused ☐ Pending Decision ☐ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice ☐ Planning Permission Not Sought ☐ Other	
	Please include details of the above choice below (for example planning reference numbers and site history)	
Other comments		

Land North of Beesonend Lane

Harpenden

St Albans Call for Sites response 2021

Planning Report on behalf of Jarvis Homes

DLA Ref: 1992/033
March 2021

CONTENTS

1.0 INTRODUCTION

1.1 This report has been produced by DLA Town Planning on behalf of Jarvis Homes, who is working with the owners of the land at Beesonend Lane to promote it for development. It is submitted in response to the "Call for sites" undertaken by St Albans City and District Council in January 2021.

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 However, in revisiting and updating the 2013 Green Belt Review, the Council will need to take account of the sites previously identified in that Review and consider whether they should continue to be recommended. This applies to all of the sites judged to have least impact on the Green Belt purposes – not only the strategic sites subsequently identified as Broad Locations but also the 8 small-scale sub-areas identified by the Council's consultants as not fulfilling significant Green Belt roles. The Beesonend Lane site was one of these 8 areas in 2013 and should continue to be identified in the new Green Belt Review.

1.4 This report sets out why the Beesonend Lane site is suitable for development and an indicative layout is included promoting a retirement development on the site.

1.5 This site has previously been submitted to the Council by Jarvis Homes. The site area now submitted also includes the adjacent land.

1.6 The level of detail given is sufficient for the consideration of the site through the Local Plan process. However, this report does not provide a planning application level of detail and further work will be required prior to any planning application being made.

2.0 SITE & CONTEXT ANALYSIS

2.1 **Location**

The Land North of Beesonend Lane site is located to the south of Harpenden. The site, shown in Figure 1 below, is circa 6ha in size and is rectangular in shape. The site is made up of two distinct components – an agricultural field and a dwelling set in a large plot. Jarvis Homes is working with the two owners of the site to promote this opportunity.

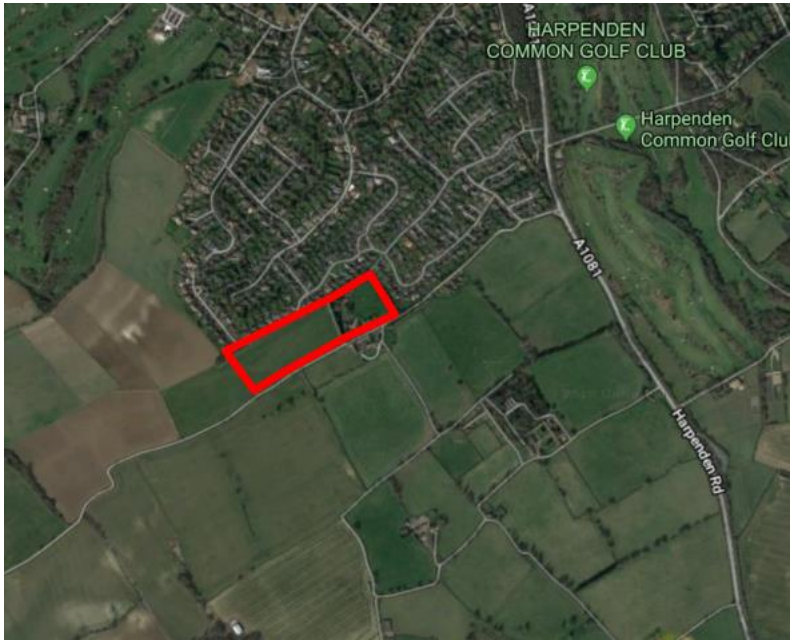


Figure 1: Site boundary

2.2 **Context**

The site currently has no development on it and is a flat green field. There is a light hedgerow on the northern boundary of the site. To the north of the site are residential dwellings along Prospect Lane.

2.3 The aerial photographs shown at Figures 2 and 3 below show the site in its context and show the relationship between the site and the adjoining urban area.

Figure 2: Aerial image of the site facing north east

Figure 3: Aerial image of the site facing north

2.4 **Access**

There are two existing points of access to the site, one from Prospect Lane from the north, and one from Beesonend Lane from the south. The Prospect Lane access would be used for development purposes.

2.5 **Development Plan Notation**

The Proposals Map for St Albans district, shown in Figure 4 opposite, shows the site adjoining the urban area of Harpenden.

The only particular designation covering the site is the Green Belt. However, the site is in close proximity to the Childwickbury Conservation Area.

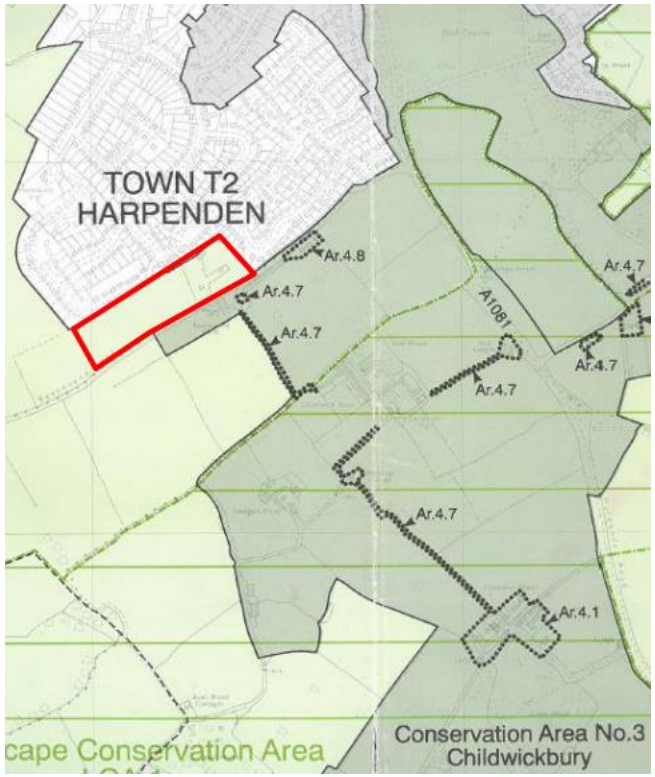


Figure 4: Proposals Map extract

2.6 **Local services**

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

Table 2.6: Summary of Local Services (approximate measurements)

Facility	Local Provision	Proximity to site (km)
Education	Busy Bees	2.0
	The Grove Junior School	2.7
	Aldwickbury School	3.3
Retail	The Co-op	2.5
	Shops along St Albans Road	2.8
	Sainsbury's	3.0
Health	Davenport House Surgery	2.9
	Southdown Dental Clinic	1.7
	Manor Pharmacy	3.4
Leisure	Harpenden Common Golf Club	0.8
	Harpenden Sports Centre	2.6
	Rothamsted Park	3.0

2.7 **Accessibility**

The site is accessible by a variety of modes of transport other than the private motor car as discussed further below.

2.8 The nearest bus stop is located within 700m of the site at Cross Lane. The 321 bus services this stop and runs every 20 minutes to surrounding settlements including Harpenden, Garston, Luton and St Albans.

2.9 Harpenden Railway Station is located some 3.3km to the north of this site, providing frequent services to St Albans, 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.

3.3 **Housing Need**

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.

3.6 **The portfolio of housing sites**

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.

3.8 **Green Belt considerations**

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.

3.9 Critically, the new Review must consider the "small-scale subareas" identified by the Council's consultants in 2013 but not taken forward by the Council in previous Local Plans. These areas, which include the Beesonend Lane site, were identified in 2013 as able to be removed from the Green Belt without compromising its wider purposes but have not been given serious consideration in Local Plan work since then.

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
5/1994/0399	Overhead line	Approved
5/2004/2717	Two storey and basement side extension, replacement front porch, roof alteration incorporating new dormer windows and alterations to openings.	Refused
5/2005/0522	Two storey side extension and detached replacement double garage (resubmission following refusal of 5/04/2717)	Approved
5/2006/0712	Certificate of Lawfulness (proposed) - Demolition of outbuildings and erection of single storey building housing swimming pool and games room	Approved
5/2007/1762	Replacement donkey and mower sheds	Approved
5/2009/1759	Certificate of Lawfulness (proposed) - Single storey side and rear extension	Approved
5/2017/3537	Certificate of Lawfulness (proposed) - Extension to existing oak framed garage	Approved

5.0 PREVIOUS SHLAA ASSESSMENT

5.1 The site was assessed as part of the 2009 SHLAA and subject to a partial update in 2016. The 2009 assessment concluded that the site should progress to the next stage of assessment, concluding:

"Whilst development could have a negative visual impact on the surrounding open countryside, it could be argued that the site would be suitable for residential development in principle and that any new housing on the southern side of Prospect Lane could be suitably screened, with Beesonend Lane forming an appropriate Green Belt boundary (as acknowledged by the Inspector at the 1992 Local Plan Inquiry)."

5.2 A comment was added about the site's accessibility to existing infrastructure. This is addressed above in terms of the specific type of residential accommodation proposed and the mix of uses helping to internalise as many trips as possible.

5.3 The 2016 SHLAA update simply concluded that the site had been included within the Green Belt Review and would be assessed for potential housing development for part of the site only, although it was not clear which part of the site was being referred to.

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 Beesonend Lane and/or Prospect Lane to which a connection could easily be made.

6.7 **Legal issues**

Jarvis Homes are working with the owners of the land to promote it for development, and therefore this site could be brought forward for development quickly.

6.8 **Access**

There are two existing points of access to the site, one from Prospect Lane from the north, and one from Beesonend Lane from the south. The Prospect Lane access would be used for development purposes.

6.9 **Other constraints**

There are no designations that would prevent development. Land on the south side of Beesonend Lane is included within the Childwickbury Conservation Area. There is also a number of Listed Buildings and Locally Listed Buildings on the south side of Beesonend Lane. However, these buildings will not prevent development and any impact can be mitigated through a sensitive layout and details.

7.0 OUTLINE OF PROPOSAL

7.1 A proposal has been put together to respond to the specific context of the site and its location. The site is best suited to residential development aimed specifically at older people.

7.2 An indicative layout has been put together and is included at Figure 5 below. This layout provides for a retirement development incorporating a range of accommodation and facilities, specifically the following elements:

- 65-home extra care facility
- Space for potential GP surgery and health centre
- Shop, restaurant, indoor pool, gymnasium
- 21 age-restricted bungalows (2- and 3-bed)
- 15 age-restricted houses
- 50 age-restricted apartments
- Bowling Green
- Central green for outdoor activity
- Private and communal gardens
- Potential shuttle bus link linking the site with the town centre and other local facilities

7.3 The apartments are shown on the western side of the development and are arranged over two floors. They are orientated so as to present a narrow edge of development facing the countryside to minimise any landscape impact. Significant landscape planting is proposed to further soften this new urban edge.

7.4 The eastern end of the development is made up of 21 two and three-bedroom bungalows, together with the retained house at Beesonend Orchard. The central part of the site contains the extra care facility and communal facilities. Access to the development is taken from Prospect Lane, which provides access to St Albans Road/A1081.

7.5 The mix of uses provided for allows a new community to develop and provides for many of the residents' day-to-day needs on-site. The shop, pool, gym, bowls green and potential space for a GP/health centre will not only reduce transport requirements arising from the site but will also foster social interaction and a sense of community.

7.6 Importantly, the facilities proposed on site could be made available to local residents living in the surrounding existing development, many of whom are retired and of a similar age profile to the new residents. This way, the sustainability of the surrounding development will be enhanced, both in transport and social terms.