







**Key:**

 Red Line Boundary	 Holywell Nodular Chalk Formation
 Nitrate Vulnerable Zone	 Chalk Rock Member

## Wallace Land Investments

### Land adjacent Lower Luton Road, Harpenden

Project Reference: 2008-046/TN01

#### Accessibility Appraisal

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## 1 Introduction

- 1.1 Transport Planning Associates has been instructed by Wallace Land Investments to provide transport planning consultancy services with respect to the potential allocation of land adjacent Lower Luton Road, Harpenden, for a residential allocation of up to 100 dwellings.
- 1.2 Wallace Land Investments is responding to St Albans District Council 'Call for Sites' and is promoting the land for inclusion in the Council's emerging local plan.
- 1.3 This Access Appraisal presents a potential design of the means of vehicle and pedestrian access, outlines the site in the context of the local highway network and identifies existing travel opportunities for pedestrians, cyclists and public transport users.
- 1.4 A summary of the local facilities is provided including an indication of the existing travel patterns of existing residents in the local area is presented. A forecast of the vehicle trips that may be generated by the development is also identified as part of this appraisal.

### Report Structure

- 1.5 The remainder of this report is structured as follows:
  - Chapter 2: Existing Accessibility;
  - Chapter 3: Proposed Mean of Access; and
  - Chapter 4: Summary.

## 2 Existing Accessibility

- 2.1 This chapter of the report identifies the site in the context of the local highway and transport networks. It outlines the existing travel opportunities for pedestrians, cyclists and public transport users and identifies local services and facilities.

### The Site

- 2.2 The site, currently utilised for agricultural purposes, is located to the east of Lower Luton Road situated to the north eastern extents of Harpenden, in the Batford area of the town.
- 2.3 The location of the site is presented within submissions in response to the call for sites by Mosaic on behalf of Wallace Land Investments.

### Pedestrian Accessibility

- 2.4 Within the immediate vicinity of the promotion site, pedestrian footways are located on either side of Lower Luton Road. Pedestrian footways are located along either Westfield Road, providing a route into the centre of Harpenden via Sun Lane.
- 2.5 To the south of the promotion site, a traffic signal controlled 'pelican' crossing assists crossing movements to the north of the Lower Luton Road / Station Road junction. The local Coop convenience store is approximately 400m to the south of the promotion site and can be accessed without the need to cross major routes.

### Cycle Accessibility

- 2.6 Within the vicinity of the site, there are no dedicated cycle facilities such as cycle lanes or cycle tracks. A 30mph speed limit exists along Lower Luton Road (B365) and the route has a generally flat topography. There are a number of local amenities, employment and retail land uses within a reasonably short cycle distance of the promotion site and the flat topography means that these locations would be accessible by bicycle.

## Public Transport

### *Bus*

- 2.7 There are existing bus stops on Lower Luton Road approximately 40 metres to the south of the promotion site. Arriva Bus operates route 357 between Elstree & Borehamwood Rail Station and Harpenden (Broadstone Road) in each direction with a frequency of one bus per hour in each direction. The first bus in the morning departs from the rail station at 08.10am with the last service departing at 6.00pm.
- 2.8 There are further bus stops along Westfield Road served by services 45 and 355 operated by Centrebus. The 45 bus service operates between Stevenage and Luton, via Kimpton, Codicote and Harpenden, with a frequency of once every three hours. The first commences at 07.30am, with the last bus at 2.30pm.
- 2.9 The 366 bus service provides for journeys between Hatfield and Luton, via Welwyn Garden City, Wheathampstead and Harpenden providing a two-hourly service. The bus stops along Westfield Road are located approximately 100m from the allocation land.

### *Rail*

- 2.10 The nearest railway station to the site is located at Station Road in Harpenden, approximately 1.4 miles to the south west of the promotion land. The railway station lies approximately 12 minutes' cycle journey or 30 minutes' walk from the promotion site.

## Local Highway

- 2.11 To the west of the site, the B653 Lower Luton Road is a single carriageway road with a footway present along both sides of the road. The road is consistent in width along its length with a road width of approximately 5.5 metres and is subject to a 30 mph speed limit. Localised widening is present to the west along Lower Luton Road where a central island is provided to maintain vehicles speeds in the presence road junctions to the north and south. Along the site boundary, Lower Luton Road is characterised as rural road with hedge lines, set back away from the carriageway and footways, present on both sides of the road. To the south of the promotion site boundary, Lower Luton Road becomes more residential in nature with a more established built up presence with development accesses and residential dwellings present.
- 2.12 To the north, Lower Luton Road joins Westfield Road at a priority controlled T-junction which provides for journeys towards the centre of Harpenden. Residential in nature, Westfield Road continues westward away from the site before bearing south where it meets Sun Lane. The road width along Westfield Road varies between approximately 6 and 7 metres with the presence of on-street car parking. To aid in the control of

vehicle speeds along Westfield Road, buildouts are present along the length of the road giving priority to southbound movements.

- 2.13 At its southern extent, Sun Street joins the A1081 Luton Road at a mini-roundabout enabling travel to the south through the centre of Harpenden and on towards Luton.

### Local Services and Facilities

- 2.14 Harpenden is a large town that provides a wide variety of local services and facilities to residents including areas of local employment and shopping. This access appraisal comments only upon the facilities that are relatively close to the promotion site, but more broadly includes a Waitrose supermarket and retail town centre on the A1081.

- 2.15 A summary of a selection of the local services and facilities is presented within Table 2.1.

Table 2.1 Summary of Local Amenities and Services

Amenity	Approximate distance from site
Convenience Store (Coop)	400m
Convenience Store (tesco Express)	560m
Batford Methodist Church	610m
Coldharbour Lane business area	720m
All Saints Church	650m
Balti Village (restaurant / take-away)	705m
Root Salon (hair studio)	500m
Kingfish (take-away)	400m

- 2.16 As can be seen a number of local facilities and services are available to the residents of Harpenden provide for a wide variety of daily necessities for the residents minimising the need for travel. The Institute of Highways and Transportation (IHT) document Guidance for Journeys on Foot (2000) provides long established guidance on walking distances from a development to local services that is most generally considered as appropriate, details of which are presented in Table 2.2.

Table 2.2 IHT guidance for acceptable journeys to be made on foot

	Town Centres	Commuting / School / Sight-seeing	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1,000m	800m
Preferred maximum	800m	2,000m	1,200m

*Taken from IHT Guidelines for Providing Journeys on Foot*

- 2.17 Comparing the location of local services and associated walk distances presented in Table 2.1 against the guidance presented within Table 2.2, it can be concluded that a number of services are situated within an acceptable walking distance with all facilities within an acceptable walking distance.

### Existing Travel Patterns

- 2.18 To understand the existing travel patterns of residents within the surrounding area, travel to work data from the 2011 Census has been obtained. Data from the mid-level super output layer 'St Albans 002', in which the site and the wider Harpenden settlement is contained within, has been used to identify the local modal share characteristics for journeys to work from the local area.

- 2.19 A summary of this data is presented within Table 2.3.

Table 2.3 2011 Census – Method of Travel to Work

Method of Travel to Work	Proportion
Work from Home	8.09%
Rail	24.79%
Bus	1.14%
Vehicle Driver	52.24%
Vehicle Passenger	2.39%
Cycle	1.85%
On Foot	9.01%
Other	0.49%

- 2.20 The results presented within Table 2.3 indicate that journeys as a vehicle driver, such as by car, represent the highest proportion of journeys to work within the surrounding area, accounting for 52.24% of journeys. It can also be seen that a reasonable proportion of residents within the local area do not need to travel at all, with 8.09% of the population working from home.
- 2.21 As identified within Table 2.3, broadly 25% of the existing residents travel to work by rail. Given the proximity of the site to Harpenden Station, it is likely that the majority of these journeys would be a walking or cycling based trip between the site and the railway station.

### 3 The Proposed Means of Access

- 3.1 This chapter of the report considers the vehicle trip generation and presents the means of vehicle access to and from the site.

#### Prospective Development

- 3.2 The proposed allocation site could be brought forward for up to 100 residential dwellings.

#### Vehicle Access

- 3.3 Hertfordshire County Council sets out its recommended junction design parameters that should be used to support new development within its Design Guide which is further supported by design guidance set out within Manual for Streets 1 and 2. Based on the guidance set out within the Hertfordshire Design Guide, a simple priority junction would provide access to the allocation site from a road with a width of 5.5m, with two 2m wide footways on either side.
- 3.4 The proposed site access arrangement is presented within the Transport Planning Associates drawing (2008-046/ SK02), appended to this report.
- 3.5 As shown in the access arrangement drawing, visibility splays of 2.4 metres by 90 metres are achievable. The proposed visibility exceeds the splays required by guidance within the Manual for Streets design guide for within a 30 mph area. The proposed visibility splays are presented within Transport Planning Associates drawing (2008-046/ SK03), also appended to this report.

#### *Pedestrian and Cycle Access*

- 3.6 In addition to vehicle access, the allocation site has an extensive frontage to Lower Luton Road meaning pedestrian and cycle access points can be provided in addition to the principle vehicle access.

#### Forecast Trip Generation

- 3.7 To understand the likely level of vehicle trips that would be generated by the development, the TRICS database has been interrogated under land use code 03 – Residential, sub-category A – Houses privately owned, filtering the scale of developments included within the search to ensure a representative sample size. The extracted trips rates have been applied to the likely scale of development of up to 100 residential dwellings to identify the level of vehicle trips that would be generated by the site during the traditional



highway network, weekday morning and evening peak periods of 08:00 to 09:00 and 17:00 to 18:00 respectively. The application of the TRICS vehicle trip rates to the development is presented within Table 3.1.

Table 3.1 Forecast Vehicle Trip Generation Calculation

	Morning peak (08:00 to 09:00)			Evening peak (17:00 to 18:00)		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Vehicle Trip Rate	0.179	0.319	0.498	0.319	0.148	0.467
Development units	100					
Vehicle Trips	18	32	50	32	15	47

- 3.8 From the information presented within Table 3.1, the development would likely generate a total of 50 and 47 two-way vehicle trips during the morning and evening peak periods respectively. This would broadly equate to a vehicle travelling to and from the site in either direction every minute. Given the vicinity of the site to the local facilities and services such as the local school, it is likely that a number of journeys can be easily undertaken on foot or by cycle and hence would not be reliant on the use of the private car.

### Vehicle Trip Distribution

- 3.9 To identify the likely distribution of the vehicle journeys, the 2011 Census origin / destination information has been reviewed for the local area. Origin data from the mid-level super output layer 'St Albans 002' has been utilised to identify, at a district level, the likely end destination of journeys to work. A summary of the main end destination districts is presented in Table 3.2 alongside an application of the proportions to the anticipated two-way journeys to and from the site during the morning and evening peak periods..

Table 3.2 Vehicle Journey Distribution Destination Districts

District	%	Two-way peak movements		District	%	Two-way peak movements	
		AM	PM			AM	PM
St Albans	39.50%	20	19	Milton Keynes	2.94%	1	1
Welwyn Hatfield	12.75%	6	6	Stevenage	2.62%	1	1
Luton	9.81%	5	5	Hertsmere	2.35%	1	1
Dacorum	6.61%	3	3	Watford	2.16%	1	1
Central Bedfordshire	3.66%	2	2	Other	17.59%	10	8

- 3.10 From the data extracted from the local Census data suggests that the majority journeys are likely to remain within the St Albans district, travelling to locations such as St Albans or remaining within Harpenden. Based on the likely trip generation, it is likely that between 20 and 19 two-way trips would be attracted to this destination during the morning and evening peak periods. Smaller proportions of journeys are likely to be attracted to further employment locations such as Welwyn Garden City or Luton.
- 3.11 Given the location of the site and the routes towards St Albans, the majority of vehicle trips generated by the site will travel southbound towards the A1081 Luton Road via Westfield Road or travelling southeast along the B653 Lower Luton Road to travel into Luton via Wheathampstead.
- 3.12 Given the facilities present with Harpenden, such as the local primary school and convenience stores, journeys to these end uses will be able to undertaken on foot or by cycle, reducing the reliance on vehicle journeys to undertake local travel.

## 4 Summary

- 4.1 Transport Planning Associates has been instructed by Wallace Land Investments to provide transport planning consultancy services with respect to the potential allocation of land to the east of Lower Luton Road, Harpenden, for a residential development of up to 100 dwellings.
- 4.2 The site is located to the east of Lower Luton Road, situated to the north eastern extents of Harpenden. Within the existing settlement of Harpenden are a significant number of local facilities and amenities that would support the proposed development and ensure that the site is sustainable, with the day to day needs of future residents met locally without the need to travel by car.
- 4.3 The vehicular access is proposed from a new priority controlled junction, to be taken onto Lower Luton Road incorporating a carriageway width of 5.5m and visibility splays of 2.4m x 90m. The identified access arrangement would be able to be delivered in accordance with the Hertfordshire design guidance for a development of up to 100 dwellings in addition to guidance set out within Manual for Streets 1 and 2. A 2 metre wide pedestrian footway would be provided alongside the site access road as it enters the site.
- 4.4 The quantum of traffic that is predicted to be generated by and attracted to the proposed development will not result in any material impact in local traffic levels.
- 4.5 Insofar as transport is concerned, given that the site is well served by local services and amenities in addition to being connected to the local highway infrastructure, the site is located in a sustainable location where the day to day needs of future residents are met locally without the need to travel by car.

## Document Management

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### Document Review

	Status	Author	Checker	Approver	Date
01	Issue	TH	JC	JC	05   03   21

A3

ORIGINAL  
PLOT SIZE

Greenacres

88.7m

Proposed footway to tie  
into existing footway

Proposed site access with tactile  
paving and dropped kerbs

Proposed footway to tie  
into existing footway

R6m

R6m

B653



INDICATIVE

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NOTES:

1. Based on OS Mapping data.
2. Subject to confirmation of Highway Boundary.
3. Subject to topographical survey.

KEY

 - Indicative Site Boundary.

Rev	Date	Details	Drawn by	Checked by	Approved by
-	-	-	-	-	-

Bristol  
**Cambridge**  
 London  
 Manchester  
 Oxford  
 Welwyn Garden City



The Stables  
 7 Chesterton Mill  
 French's Road  
 Cambridge  
 CB4 3NP  
 01223 455385  
[www.tpa.uk.com](http://www.tpa.uk.com)

CLIENT:

Wallace Land Investments

PROJECT:

Land off Lower Luton Road,  
Harpenden

TITLE:

Proposed  
Access Arrangement

STATUS:

**FEASIBILITY**


SCALE: 1:250	DATE: 03.03.21	DRAWN: JA	CHECKED: JC	APPROVED: JC
JOB NO: 2008-046	DRAWING NO: SK02		REVISION: -	

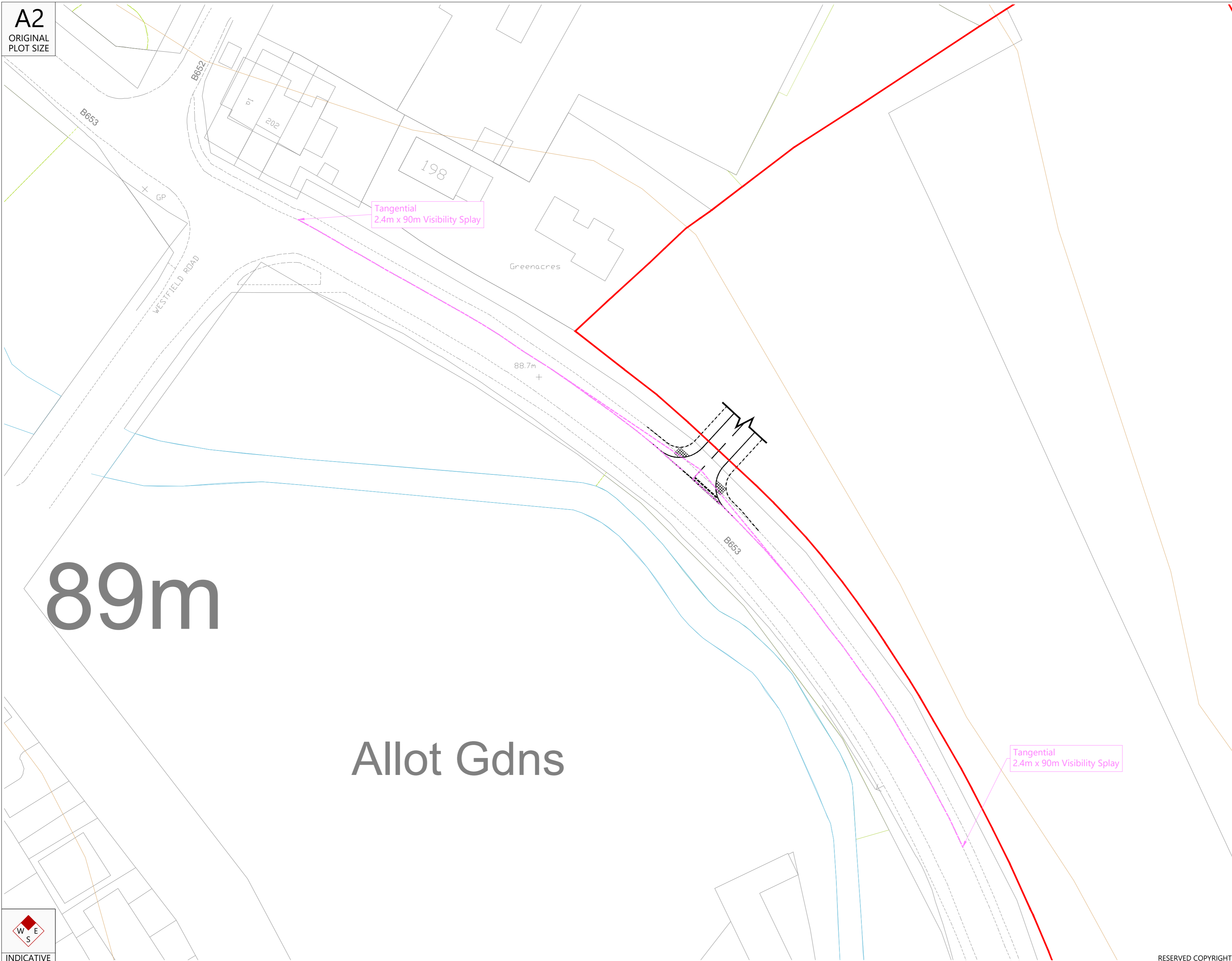
A2  
ORIGINAL  
PLOT SIZE

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- NOTES:
1. Based on OS Mapping data.
  2. Subject to confirmation of Highway Boundary.
  3. Subject to topographical survey.

KEY

 - Indicative Site Boundary.



Rev	Date	Details	Drawn by	Checked by	Approved by
-	-	-	-	-	-

89m

Allot Gdns

Bristol  
**Cambridge**  
 London  
 Manchester  
 Oxford  
 Welwyn Garden City



The Stables  
 7 Chesterton Mill  
 French's Road  
 Cambridge  
 CB4 3NP  
 01223 455385  
[www.tpa.uk.com](http://www.tpa.uk.com)

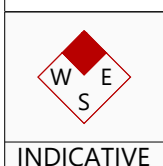
CLIENT:  
**Wallace Land Investments**

PROJECT:  
 Land off Lower Luton Road,  
 Harpenden

TITLE:  
**Proposed  
 Access Arrangement  
 Visibility Plan**

STATUS:  
**FEASIBILITY**

SCALE: 1:500	DATE: 03.03.21	DRAWN: JA	CHECKED: JC	APPROVED: JC
JOB NO: 2008-046	DRAWING NO: SK03	REVISION: -		



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

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

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

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

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

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

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

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

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

**Please do not submit sites that:**

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

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

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

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

**By online consultation portal:**

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

**By e-mail to:** [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

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

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

<b>Your Details</b>	
Name	Nick Baker
Company/Organisation	Lichfields on behalf of L&G Strategic Land (Harpenden) Limited
Address	The Minster Building, 21 Mincing Lane
Postcode	EC3R 7AG
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

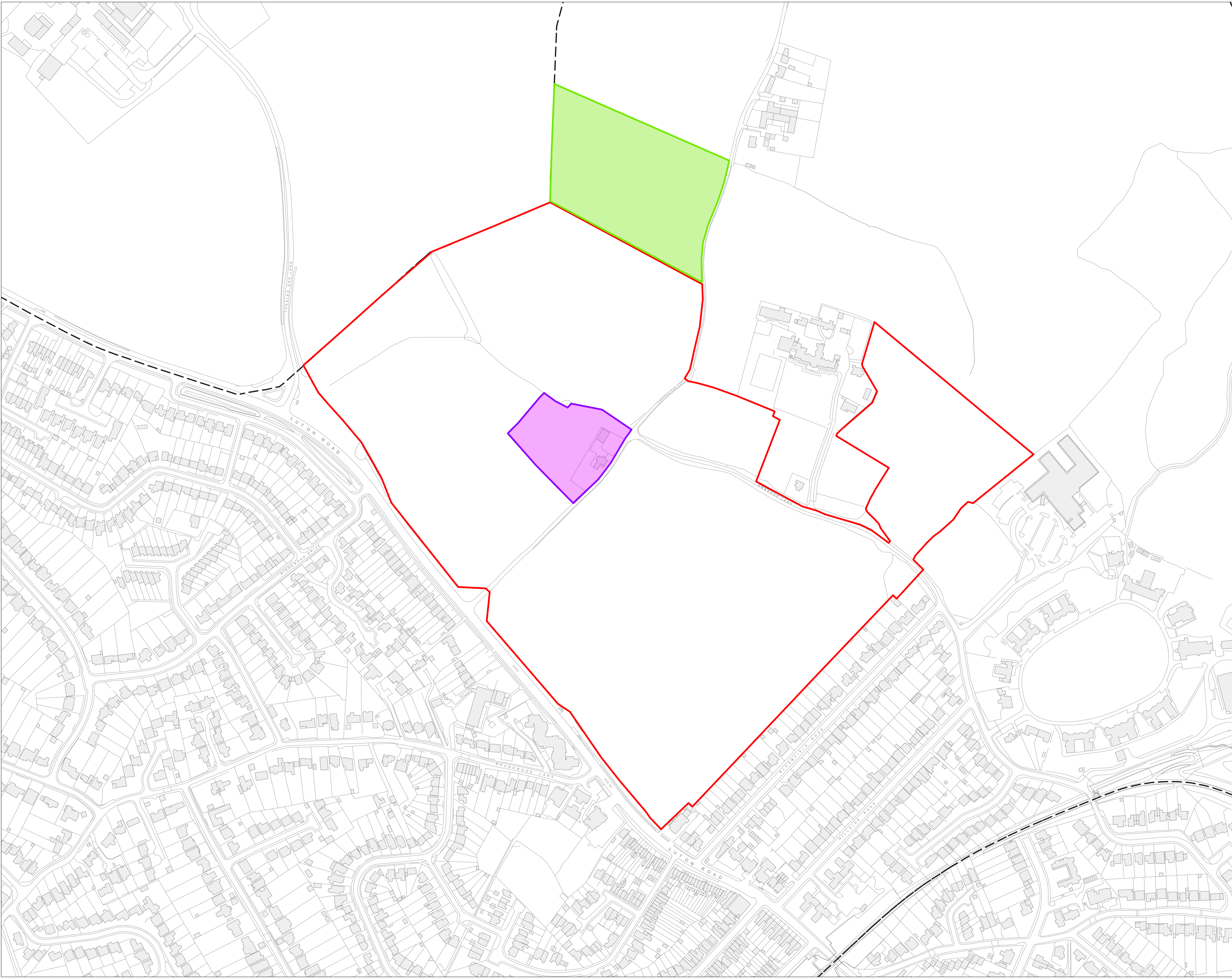


<b>Site Details</b>					
<b>Requirements:</b>					
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Northwest Harpenden. Please see Site Plan appended to this form.				
Site area (in hectares)	27 hectares (plus additional land for planting)				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table>	Easting		Northing	
Easting		Northing			
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	[REDACTED]				
Current land use	The site is undeveloped and is in agricultural use.				
Condition of current use (e.g. vacant, derelict)	The site is undeveloped and is in agricultural use.				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input checked="" type="checkbox"/> Biodiversity Improvement / Offsetting <input checked="" type="checkbox"/> Green Belt Compensatory Land <input checked="" type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify) – <i>Education</i>				

Reasons for suggested development / land use	The proposed land use would predominately be for housing, though other land uses would form part of the wider development, e.g. flexi care units, education and associated infrastructure and amenity space. Please refer to Lichfields' covering letter and appendices for more details.
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Preservation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No- The majority of the site is not in an area at risk of flooding with the exception of an area running parallel to the A1081 Luton Road which is at risk of localised flooding. Initial design work indicates this is not a constraint to development.
	Topography affecting site (land levels, slopes, ground conditions)	<input checked="" type="checkbox"/> Yes-The site slopes down from east/north-east towards the south/south-west with a level change of approximately 20 to 25 metres. To the east, Ambrose Lane enters the site from the south-east at approximately 130 metres AOD with land to the north-east at an elevation of approximately 125metres AOD. To the west/south-west along Luton Road, the site elevation is at approximately 110 metres AOD <input type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	<p>Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).</p>
	<p>Other constraints affecting the site</p>	<p><input checked="" type="checkbox"/> Yes (If yes, please specify)  The site is within the Metropolitan Green Belt.  Though it falls outside of the site, Cooters End Farm is located adjacent to Cooters End Lane towards the northern half of the site. Parts of the two-storey building date from the late 17th Century and the building is Grade II listed.</p> <p><input type="checkbox"/> No</p>
<p>Planning Status</p>	<p><input type="checkbox"/> Planning Permission Granted  <input type="checkbox"/> Planning Permission Refused  <input type="checkbox"/> Pending Decision  <input type="checkbox"/> Application Withdrawn  <input type="checkbox"/> Planning Permission Lapsed  <input checked="" type="checkbox"/> Pre-Application Advice  <input type="checkbox"/> Planning Permission Not Sought  <input checked="" type="checkbox"/> Other – <i>Masterplanned with SACDC under the previous Local Plan Broad Location allocation.</i></p> <hr/> <p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p>The site is currently within the Metropolitan Green Belt and was previously identified for release as one of a number of 'Broad Locations' to meet housing and other development needs by St Albans City and District Council (SACDC) in the now withdrawn draft local plan (and the previous 'Strategic' and 'Detailed' Local Plans drafted in 2014 and 2016. L&amp;G has engaged with the Local Authority having signed up to a Planning Performance Agreement for the site and has had numerous pre-application meetings with the Council, attended public consultations and progressed the site through the Council's Masterplan process.</p>	
<p>Other comments</p>	<p>Please refer to Lichfields' covering letter for more details.</p>	



Notes & Key  
 DIMENSIONS NOT TO BE SCALED FROM THIS DRAWING.  
 CONTRACTOR TO NOTIFY ARCHITECT OF SITE VARIATIONS  
 AFFECTING INFORMATION ON THIS DRAWING.

- Proposed call for sites submission boundary: North West Harpenden
- Area 27.1ha, excluding purple tinted land not in the client's ownership
- Additional land for planting and mitigation, 2.71 ha
- Land not in the client's ownership

\*Boundary interpolated by GHA onto Ordnance Survey, based on land ownership information recieved from Legal and General

Revisions

Date	Rev	By	Details
03.03.21	A	DS	Issued for client review

Location Key

**INFORMATION**

Project  
 North West Harpenden

Client  
 Legal and General

Drawing Title  
 Site Extents - Call for Sites

Drawing No.	Revision
2221-A-SK-210303	A

Scale	Date	Checked
1:2000-A1	MAR 21	AM

Glenn Howells Architects  
 Birmingham London www.glennhowells.co.uk

Planning Policy  
St Albans Council Offices  
St Peter Street  
St Albans  
Hertfordshire  
AL1 3JW

**Date:** 8 March 2021  
**Our ref:** 60885/01/SSL/JWO/19514859v1  
**Your ref:**

Dear Sir/Madam

## **New Local Plan 2020-2038**

### **Response to Call for Sites 2021, Draft Statement of Community Involvement and Sustainability Appraisal Scoping Report Consultation**

On behalf of our client, Legal & General Capital (hereafter “L&G”), we write in response to the consultation on St Albans City and District Council (SACDC) new Local Plan 2020-2038 which includes a Call for Sites 2021 process, a Draft Statement of Community Involvement and Sustainability Appraisal Scoping Report. L&G welcomes the opportunity to participate in this consultation.

### **Land at North West Harpenden (NWH)**

These representations are made in the context of L&G’s long-term interest in land at ‘North West Harpenden’ within St Albans District. L&G own the majority of the ‘North West Harpenden’ Broad Location Site, previously identified for development in the now withdrawn SACDC Draft Local Plan (2020 – 2036) and prior to that in the draft Strategic and Detailed Local Plans, also withdrawn. The site has been promoted for a number of years by L&G for residential development including c.580 homes, the provision of a 2FE primary school site, allotments, and associated landscaping and infrastructure.

### **Site Background**

The NWH site is currently within the Metropolitan Green Belt and is located north-east of Luton Road on the north-western edge of Harpenden. It is generally defined by Luton Road, field boundaries to the north of Cooters End Lane, by Ambrose Lane to the north-east, and by existing residential properties on Bloomfield Road to the south-east. The site includes an area of approximately 25 hectares. The site is primarily in agricultural use (crops) and is part of a wider landholding which could provide adjacent opportunities for mitigation and biodiversity enhancement.

There are significant level changes on the site, which generally falls from the east to the west (Ambrose Lane to Luton Road). The areas north-east of both Luton Road (north of Cooters End Lane) and Ambrose Lane are generally more level.

The site is surrounded on two sides (south-west and south-east) by existing residential areas. The area to the north is primarily in agricultural use. To the north-west on Ambrose Lane (and adjacent to the proposed school site) is the King's School, a private secondary school. Nearby on Ambrose Lane is Ambrose Wood, an area of ancient woodland, a Spire private hospital, and the Oval, a training centre and community facility run on a charitable basis by YWAM. Cooters End Farm on Cooters End Lane is Grade II listed and falls outside of the site boundary and L&G's ownership.

To the south-west of the site on Luton Road is a public house (The Bell, Grade II Listed) and a small parade of local shops. The site is located approximately 2km north-west of Harpenden town centre, 8km south of Luton and 8km north/north-west of St Albans, both of which provide a wider range of higher order retail and service facilities.

The nearest train station is in Harpenden, approximately 2.5km from the site, with regular bus services (northbound towards Luton and Southbound towards Harpenden/St Albans) available from stops on Luton Road.

The site is therefore already well connected to a range of local facilities, services and transport connections.

L&G has undertaken extensive discussions with SACDC as part of the previous Local Plan preparation processes. In line with the requirements of the now withdrawn Local Plan (i.e. the masterplan Toolkit), the Council and L&G sought to manage the NWH Masterplanning process through a Planning Performance Agreement (PPA). This PPA set out the agreed ways of working between L&G, SACDC and the County Council (Hertfordshire County Council) (HCC). L&G and its consultant team began working on the Masterplan process in Summer 2019 and L&G formally signed up to the PPA in February 2020.

As a result of the formal withdrawal of the draft Local Plan on 23 November 2020, the PPA process for the site was terminated on 18 January 2021 by SACDC.

L&G remains committed to providing new homes and associated facilities in Harpenden at the earliest opportunity and would be pleased to work with SACDC to support the preparation of the emerging Local Plan and secure the early delivery of a range of urgently needed new homes, including affordable housing.

## **Call for Sites**

Attached to this letter is a completed 'Call for Sites 2021' Site Identification Form and a site location plan. The red line boundary on the plan identifies an area suitable for development which reflects the previous 'Broad Location' and an additional small area which could accommodate further development, associated infrastructure and landscaping. The plan also identifies an area (shaded green) which could be made available for new woodland planting, biodiversity enhancement and recreation use in the event the NWH site is allocated for residential development. For the avoidance of doubt, it is not currently L&G's expectation that this land would be offered for planting which is unrelated to development at NWH.

The NWH site is suitable for housing and does not have any abnormal constraints or requirements. The site has been identified by SACDC since 2014 as a suitable location for residential-led development. Given its scale and location, the site can contribute to meeting housing needs early in the plan period. It is intended that the likely timescale for the delivery of the first phase of the development will be within 1-5 years of the plan adoption. The site presents an opportunity for a sustainable integrated and well-connected extension to the Harpenden urban area.

As discussed above, the NWH site had progressed to an advanced stage in the Masterplanning process under the previous draft Local Plan, and both a Design Review Panel and local consultation events indicated support for L&G's design approach. Further, while the process was paused before a full draft Masterplan had

been prepared, the regular workshops with Officers from both the District and County Council's established an agreed approach across a range of design issues. For reference and to assist in the consideration of the site in the Council's 2021 Call for Sites process, the proposed site development previously included plans for:

- Up to 580 homes of a variety of tenure and size (including 40% affordable provision) including a Flexi-care facility of up to 50 bedrooms;
- A 2.5 ha site for a two-form entry primary school;
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- An area of new woodland and additional green space to be provided within the remaining Green Belt beyond the development parcels/emerging allocation but on land also owned by the applicant

While L&G would review any future scheme based on the policy and commercial context which exists at that time, we anticipate that the broad nature and scale of development established through the Masterplanning process could be achievable. L&G will also consider the environmental performance of the development at the detailed design stage with due regard to available construction methods and technologies.

Given L&G's wider landholding locally there is an opportunity for L&G to accommodate additional development and provide an area for mitigation beyond the areas identified on the accompanying plan should the Council wish to explore the opportunity for additional development or an extended allocation in this location.

Finally, L&G would welcome an allocation for development which provides for (at least) any school buildings required to be accommodated on land released from the Green Belt as part of a general release. This approach will enable any future stages of the design process to approach the masterplanning of the NWH area on a less constrained basis and ensure that the most appropriate mitigation to address any effects can be sought.

## **Draft Statement of Community Involvement**

As part of the consultation we have reviewed the Draft Statement of Community Involvement (DSCI) on behalf of L&G.

The table on page 17 of the DSCI states that for Significant Major Proposals (50 dwellings or more, on land more than 5 hectares, 10,000sqm of non-residential floorspace, development that requires an Environmental Impact Assessment), pre-application consultation is generally recommended in line with that of Major Proposals. These elements appear reasonable and proportionate. However, the DSCI states that for Significant Major Development applications, consideration should be given to the use of Community Charrettes at an early design stage using organisations such as Look! St Albans. We ask that clarification of this process and the expectations for applicants should be included within the DSCI, and that if this recommendation is maintained it is made clear that applicants are free to employ the services of any suitable consultant or organisation. It will be important to understand the expectations around this recommendation, as an addition to the already wide ranging consultation processes. Specifically, we request clarity on how this activity will be coordinated with a Design Review Panel process which is also included within the DSCI.

Paragraph 6.7 of the DSCI outlines the Council's proposed consultation process on a range of planning applications. For major developments the consultation method proposed is over and above the requirements within the Town and Country Planning (Development Management Procedure) (England) Order 2015. Within the Order 21 days is allowed for the consultation process. However, the DSCI refers to a 25 day consultation. The SCI should be amended to be in line with national legislation.

Paragraph 6.16 refers to potential amendments to planning applications and states that "*any amendment will depend upon the time left in which to determine the application and whether neighbour notification is required as a result of the amendment*". In line with the NPPF, the DSCI should approach the decision making process in a positive and creative way and work with applicants to secure developments that will improve the economic, social and environmental conditions of the area (paragraph 38 of the NPPF). Whilst it is acknowledged that timescales are a key measurable in the planning determination process, the acceptability of any amendments should not be determined based on the target determination date.

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We do not provide detailed comments on the SASR, but welcome the acknowledgement in the SASR that without an adopted Local Plan there will be an even greater shortage of housing, which would particularly affect young families wanting to get on the housing ladder as well as the provision of affordable housing to meet the needs of lower income groups.

It is also noted that the SA confirms that "*while some new housing will inevitably continue to come forward from brownfield land and from other reforms to permitted development rights introduced in recent years, the council is highly likely to have to consider releases of Green Belt land if it cannot find a neighbouring authority to cooperate and take some of the district's requirements*" (para A8.3).

### **Conclusion**

We trust the above comments are helpful and will be considered as part of the development of the draft Local Plan. Please do not hesitate to contact Nick Baker or Jennifer Woods to discuss these representations and/or to facilitate discussions with our client.

We also look forward to receiving details of the progress of the future consultation stages of the Local Plan.

Yours faithfully

  
**Lichfields**

Copy

Mike Emmett, Legal & General



Planning Policy  
St Albans Council Offices  
St Peter Street  
St Albans  
Hertfordshire  
AL1 3JW

**Date:** 8 March 2021  
**Our ref:** 60885/01/SSL/JWO/19514859v1  
**Your ref:**

Dear Sir/Madam

## **New Local Plan 2020-2038**

### **Response to Call for Sites 2021, Draft Statement of Community Involvement and Sustainability Appraisal Scoping Report Consultation**

On behalf of our client, Legal & General Capital (hereafter “L&G”), we write in response to the consultation on St Albans City and District Council (SACDC) new Local Plan 2020-2038 which includes a Call for Sites 2021 process, a Draft Statement of Community Involvement and Sustainability Appraisal Scoping Report. L&G welcomes the opportunity to participate in this consultation.

### **Land at North West Harpenden (NWH)**

These representations are made in the context of L&G’s long-term interest in land at ‘North West Harpenden’ within St Albans District. L&G own the majority of the ‘North West Harpenden’ Broad Location Site, previously identified for development in the now withdrawn SACDC Draft Local Plan (2020 – 2036) and prior to that in the draft Strategic and Detailed Local Plans, also withdrawn. The site has been promoted for a number of years by L&G for residential development including c.580 homes, the provision of a 2FE primary school site, allotments, and associated landscaping and infrastructure.

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Yours faithfully



**Lichfields**

Copy

Mike Emmett, Legal & General

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

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

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

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

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

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

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

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

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

**Please do not submit sites that:**

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

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

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

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

**By online consultation portal:**

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

**By e-mail to:** [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

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

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

<b>Your Details</b>	
Name	Nick Baker
Company/Organisation	Lichfields on behalf of L&G Strategic Land (Harpenden) Limited
Address	The Minster Building, 21 Mincing Lane
Postcode	EC3R 7AG
Telephone	[REDACTED]
Email	[REDACTED]
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

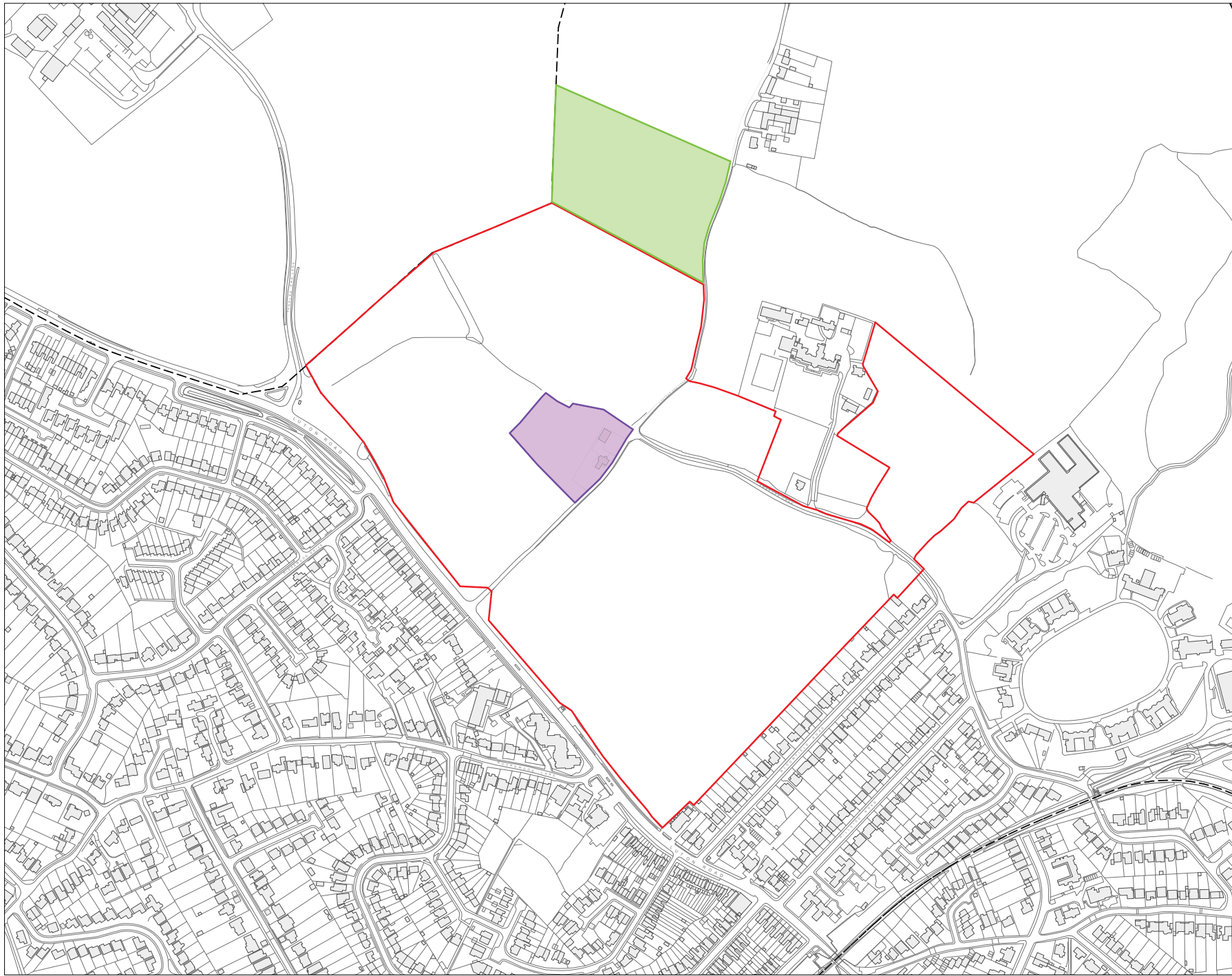
<b>Site Details</b>					
<b>Requirements:</b>					
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Northwest Harpenden. Please see Site Plan appended to this form.				
Site area (in hectares)	27 hectares (plus additional land for planting)				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table>	Easting		Northing	
Easting		Northing			
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	<div style="background-color: black; height: 20px; width: 100%;"></div> <p>Third party land is not required for the delivery of development.</p>				
Current land use	The site is undeveloped and is in agricultural use.				
Condition of current use (e.g. vacant, derelict)	The site is undeveloped and is in agricultural use.				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input checked="" type="checkbox"/> Biodiversity Improvement / Offsetting <input checked="" type="checkbox"/> Green Belt Compensatory Land <input checked="" type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify) – <i>Education</i>				

Reasons for suggested development / land use	The proposed land use would predominately be for housing, though other land uses would form part of the wider development, e.g. flexi care units, education and associated infrastructure and amenity space. Please refer to Lichfields' covering letter and appendices for more details.
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No- The majority of the site is not in an area at risk of flooding with the exception of an area running parallel to the A1081 Luton Road which is at risk of localised flooding. Initial design work indicates this is not a constraint to development.
	Topography affecting site (land levels, slopes, ground conditions)	<input checked="" type="checkbox"/> Yes-The site slopes down from east/north-east towards the south/south-west with a level change of approximately 20 to 25 metres. To the east, Ambrose Lane enters the site from the south-east at approximately 130 metres AOD with land to the north-east at an elevation of approximately 125metres AOD. To the west/south-west along Luton Road, the site elevation is at approximately 110 metres AOD <input type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



	<p>Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).</p>
	<p>Other constraints affecting the site</p>	<p><input checked="" type="checkbox"/> Yes (If yes, please specify)  The site is within the Metropolitan Green Belt.  Though it falls outside of the site, Cooters End Farm is located adjacent to Cooters End Lane towards the northern half of the site. Parts of the two-storey building date from the late 17th Century and the building is Grade II listed.</p> <p><input type="checkbox"/> No</p>
<p>Planning Status</p>	<p><input type="checkbox"/> Planning Permission Granted  <input type="checkbox"/> Planning Permission Refused  <input type="checkbox"/> Pending Decision  <input type="checkbox"/> Application Withdrawn  <input type="checkbox"/> Planning Permission Lapsed  <input checked="" type="checkbox"/> Pre-Application Advice  <input type="checkbox"/> Planning Permission Not Sought  <input checked="" type="checkbox"/> Other – <i>Masterplanned with SACDC under the previous Local Plan Broad Location allocation.</i></p> <hr/> <p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p>The site is currently within the Metropolitan Green Belt and was previously identified for release as one of a number of 'Broad Locations' to meet housing and other development needs by St Albans City and District Council (SACDC) in the now withdrawn draft local plan (and the previous 'Strategic' and 'Detailed' Local Plans drafted in 2014 and 2016. L&amp;G has engaged with the Local Authority having signed up to a Planning Performance Agreement for the site and has had numerous pre-application meetings with the Council, attended public consultations and progressed the site through the Council's Masterplan process.</p>	
<p>Other comments</p>	<p>Please refer to Lichfields' covering letter for more details.</p>	



Notes & Key  
 DIMENSIONS NOT TO BE SCALED FROM THIS DRAWING.  
 CONTRACTOR TO NOTIFY ARCHITECT OF SITE VARIATIONS  
 AFFECTING INFORMATION ON THIS DRAWING.

- Proposed call for sites submission boundary: North West Harpenden  
Area 27.1ha, excluding purple tinted land not in the client's ownership
- Additional land for planting and mitigation, 2.71 ha
- Land not in the client's ownership

\*Boundary interpolated by GHA onto Ordnance Survey, based on land ownership information received from Legal and General

Date	Rev	By	Details
05.03.21	A	DS	Issued for client review

Location Key



**INFORMATION**

Project  
 North West Harpenden

Client  
 Legal and General

Drawing Title  
**Site Extents - Call for Sites**

Drawing No. **2221-A-SK-210303** Revision **A**

Scale **1:2000-A1** Date **MAR 21** Checked **AM**

**Glenn Howells Architects**  
 Birmingham London www.glennhowells.co.uk

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

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

**Please do not submit sites that:**

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

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

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

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

**By online consultation portal:**

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

**By e-mail to:** [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

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

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

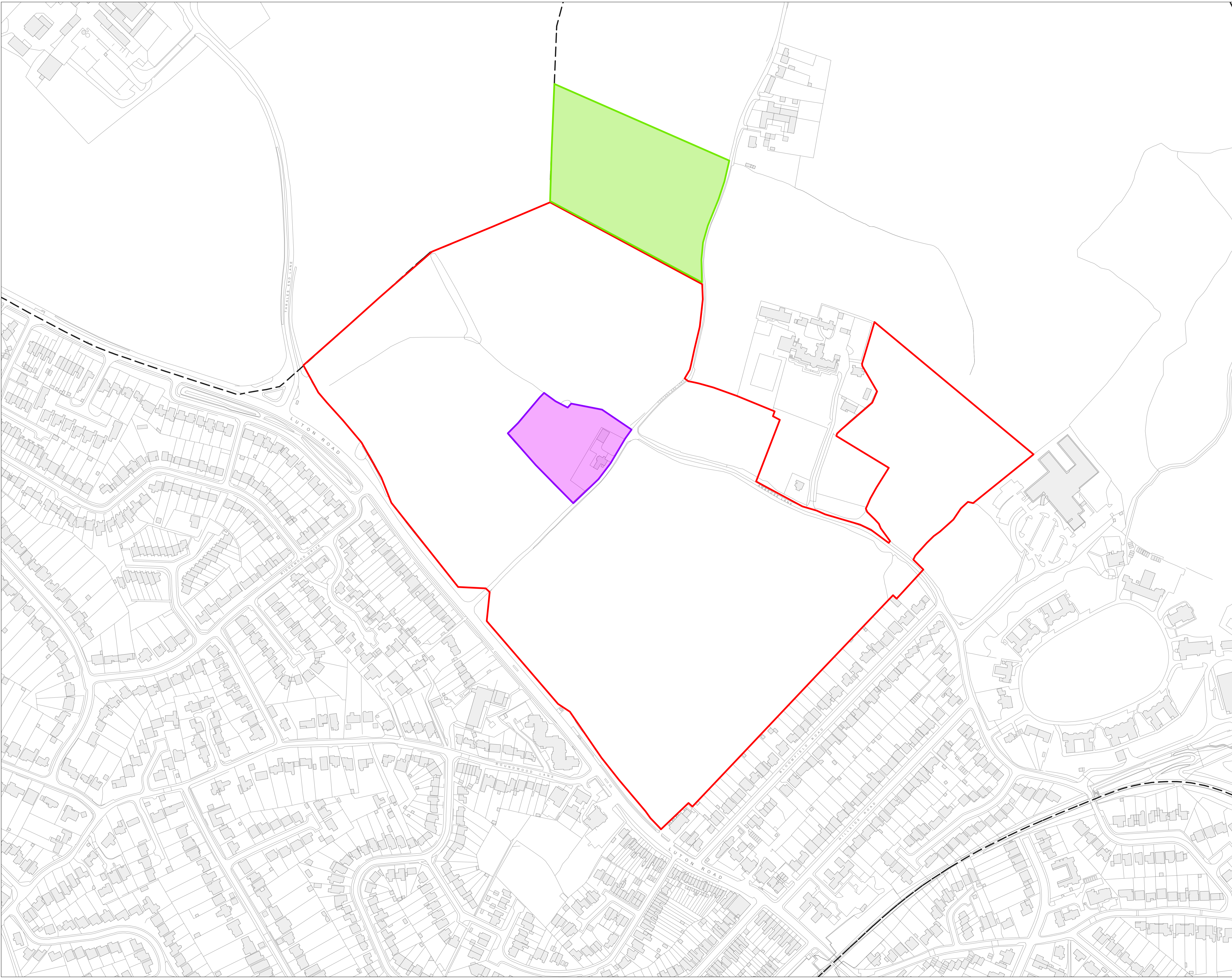
<b>Your Details</b>	
Name	Nick Baker
Company/Organisation	Lichfields on behalf of L&G Strategic Land (Harpenden) Limited
Address	The Minster Building, 21 Mincing Lane
Postcode	EC3R 7AG
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

<b>Site Details</b>					
<b>Requirements:</b>					
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Northwest Harpenden. Please see Site Plan appended to this form.				
Site area (in hectares)	27 hectares (plus additional land for planting)				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table>	Easting		Northing	
Easting		Northing			
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	[REDACTED]				
Current land use	The site is undeveloped and is in agricultural use.				
Condition of current use (e.g. vacant, derelict)	The site is undeveloped and is in agricultural use.				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input checked="" type="checkbox"/> Biodiversity Improvement / Offsetting <input checked="" type="checkbox"/> Green Belt Compensatory Land <input checked="" type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify) – <i>Education</i>				

Reasons for suggested development / land use	The proposed land use would predominately be for housing, though other land uses would form part of the wider development, e.g. flexi care units, education and associated infrastructure and amenity space. Please refer to Lichfields' covering letter and appendices for more details.
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Preservation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No- The majority of the site is not in an area at risk of flooding with the exception of an area running parallel to the A1081 Luton Road which is at risk of localised flooding. Initial design work indicates this is not a constraint to development.
	Topography affecting site (land levels, slopes, ground conditions)	<input checked="" type="checkbox"/> Yes-The site slopes down from east/north-east towards the south/south-west with a level change of approximately 20 to 25 metres. To the east, Ambrose Lane enters the site from the south-east at approximately 130 metres AOD with land to the north-east at an elevation of approximately 125metres AOD. To the west/south-west along Luton Road, the site elevation is at approximately 110 metres AOD <input type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	<p>Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).</p>
	<p>Other constraints affecting the site</p>	<p><input checked="" type="checkbox"/> Yes (If yes, please specify)  The site is within the Metropolitan Green Belt.  Though it falls outside of the site, Cooters End Farm is located adjacent to Cooters End Lane towards the northern half of the site. Parts of the two-storey building date from the late 17th Century and the building is Grade II listed.</p> <p><input type="checkbox"/> No</p>
<p>Planning Status</p>	<p><input type="checkbox"/> Planning Permission Granted  <input type="checkbox"/> Planning Permission Refused  <input type="checkbox"/> Pending Decision  <input type="checkbox"/> Application Withdrawn  <input type="checkbox"/> Planning Permission Lapsed  <input checked="" type="checkbox"/> Pre-Application Advice  <input type="checkbox"/> Planning Permission Not Sought  <input checked="" type="checkbox"/> Other – <i>Masterplanned with SACDC under the previous Local Plan Broad Location allocation.</i></p> <hr/> <p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p>The site is currently within the Metropolitan Green Belt and was previously identified for release as one of a number of 'Broad Locations' to meet housing and other development needs by St Albans City and District Council (SACDC) in the now withdrawn draft local plan (and the previous 'Strategic' and 'Detailed' Local Plans drafted in 2014 and 2016. L&amp;G has engaged with the Local Authority having signed up to a Planning Performance Agreement for the site and has had numerous pre-application meetings with the Council, attended public consultations and progressed the site through the Council's Masterplan process.</p>	
<p>Other comments</p>	<p>Please refer to Lichfields' covering letter for more details.</p>	



Notes & Key  
 DIMENSIONS NOT TO BE SCALED FROM THIS DRAWING.  
 CONTRACTOR TO NOTIFY ARCHITECT OF SITE VARIATIONS  
 AFFECTING INFORMATION ON THIS DRAWING.

- Proposed call for sites submission boundary: North West Harpenden
- Area 27.1ha, excluding purple tinted land not in the client's ownership
- Additional land for planting and mitigation, 2.71 ha
- Land not in the client's ownership

\*Boundary interpolated by GHA onto Ordnance Survey, based on land ownership information recieved from Legal and General

Revisions

Date	Rev	By	Details
03.03.21	A	DS	Issued for client review

Location Key



**INFORMATION**

Project  
 North West Harpenden

Client  
 Legal and General

Drawing Title  
 Site Extents - Call for Sites

Drawing No.	Revision
2221-A-SK-210303	A

Scale	Date	Checked
1:2000-A1	MAR 21	AM

**Glenn Howells Architects**  
 Birmingham London www.glennhowells.co.uk



Planning Policy  
St Albans Council Offices  
St Peter Street  
St Albans  
Hertfordshire  
AL1 3JW

**Date:** 8 March 2021  
**Our ref:** 60885/01/SSL/JWO/19514859v1  
**Your ref:**

Dear Sir/Madam

## **New Local Plan 2020-2038**

### **Response to Call for Sites 2021, Draft Statement of Community Involvement and Sustainability Appraisal Scoping Report Consultation**

On behalf of our client, Legal & General Capital (hereafter “L&G”), we write in response to the consultation on St Albans City and District Council (SACDC) new Local Plan 2020-2038 which includes a Call for Sites 2021 process, a Draft Statement of Community Involvement and Sustainability Appraisal Scoping Report. L&G welcomes the opportunity to participate in this consultation.

### **Land at North West Harpenden (NWH)**

These representations are made in the context of L&G’s long-term interest in land at ‘North West Harpenden’ within St Albans District. L&G own the majority of the ‘North West Harpenden’ Broad Location Site, previously identified for development in the now withdrawn SACDC Draft Local Plan (2020 – 2036) and prior to that in the draft Strategic and Detailed Local Plans, also withdrawn. The site has been promoted for a number of years by L&G for residential development including c.580 homes, the provision of a 2FE primary school site, allotments, and associated landscaping and infrastructure.

### **Site Background**

The NWH site is currently within the Metropolitan Green Belt and is located north-east of Luton Road on the north-western edge of Harpenden. It is generally defined by Luton Road, field boundaries to the north of Cooters End Lane, by Ambrose Lane to the north-east, and by existing residential properties on Bloomfield Road to the south-east. The site includes an area of approximately 25 hectares. The site is primarily in agricultural use (crops) and is part of a wider landholding which could provide adjacent opportunities for mitigation and biodiversity enhancement.

There are significant level changes on the site, which generally falls from the east to the west (Ambrose Lane to Luton Road). The areas north-east of both Luton Road (north of Cooters End Lane) and Ambrose Lane are generally more level.

The site is surrounded on two sides (south-west and south-east) by existing residential areas. The area to the north is primarily in agricultural use. To the north-west on Ambrose Lane (and adjacent to the proposed school site) is the King's School, a private secondary school. Nearby on Ambrose Lane is Ambrose Wood, an area of ancient woodland, a Spire private hospital, and the Oval, a training centre and community facility run on a charitable basis by YWAM. Cooters End Farm on Cooters End Lane is Grade II listed and falls outside of the site boundary and L&G's ownership.

To the south-west of the site on Luton Road is a public house (The Bell, Grade II Listed) and a small parade of local shops. The site is located approximately 2km north-west of Harpenden town centre, 8km south of Luton and 8km north/north-west of St Albans, both of which provide a wider range of higher order retail and service facilities.

The nearest train station is in Harpenden, approximately 2.5km from the site, with regular bus services (northbound towards Luton and Southbound towards Harpenden/St Albans) available from stops on Luton Road.

The site is therefore already well connected to a range of local facilities, services and transport connections.

L&G has undertaken extensive discussions with SACDC as part of the previous Local Plan preparation processes. In line with the requirements of the now withdrawn Local Plan (i.e. the masterplan Toolkit), the Council and L&G sought to manage the NWH Masterplanning process through a Planning Performance Agreement (PPA). This PPA set out the agreed ways of working between L&G, SACDC and the County Council (Hertfordshire County Council) (HCC). L&G and its consultant team began working on the Masterplan process in Summer 2019 and L&G formally signed up to the PPA in February 2020.

As a result of the formal withdrawal of the draft Local Plan on 23 November 2020, the PPA process for the site was terminated on 18 January 2021 by SACDC.

L&G remains committed to providing new homes and associated facilities in Harpenden at the earliest opportunity and would be pleased to work with SACDC to support the preparation of the emerging Local Plan and secure the early delivery of a range of urgently needed new homes, including affordable housing.

## **Call for Sites**

Attached to this letter is a completed 'Call for Sites 2021' Site Identification Form and a site location plan. The red line boundary on the plan identifies an area suitable for development which reflects the previous 'Broad Location' and an additional small area which could accommodate further development, associated infrastructure and landscaping. The plan also identifies an area (shaded green) which could be made available for new woodland planting, biodiversity enhancement and recreation use in the event the NWH site is allocated for residential development. For the avoidance of doubt, it is not currently L&G's expectation that this land would be offered for planting which is unrelated to development at NWH.

The NWH site is suitable for housing and does not have any abnormal constraints or requirements. The site has been identified by SACDC since 2014 as a suitable location for residential-led development. Given its scale and location, the site can contribute to meeting housing needs early in the plan period. It is intended that the likely timescale for the delivery of the first phase of the development will be within 1-5 years of the plan adoption. The site presents an opportunity for a sustainable integrated and well-connected extension to the Harpenden urban area.

As discussed above, the NWH site had progressed to an advanced stage in the Masterplanning process under the previous draft Local Plan, and both a Design Review Panel and local consultation events indicated support for L&G's design approach. Further, while the process was paused before a full draft Masterplan had

been prepared, the regular workshops with Officers from both the District and County Council's established an agreed approach across a range of design issues. For reference and to assist in the consideration of the site in the Council's 2021 Call for Sites process, the proposed site development previously included plans for:

- Up to 580 homes of a variety of tenure and size (including 40% affordable provision) including a Flexi-care facility of up to 50 bedrooms;
- A 2.5 ha site for a two-form entry primary school;
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- An area of new woodland and additional green space to be provided within the remaining Green Belt beyond the development parcels/emerging allocation but on land also owned by the applicant

While L&G would review any future scheme based on the policy and commercial context which exists at that time, we anticipate that the broad nature and scale of development established through the Masterplanning process could be achievable. L&G will also consider the environmental performance of the development at the detailed design stage with due regard to available construction methods and technologies.

Given L&G's wider landholding locally there is an opportunity for L&G to accommodate additional development and provide an area for mitigation beyond the areas identified on the accompanying plan should the Council wish to explore the opportunity for additional development or an extended allocation in this location.

Finally, L&G would welcome an allocation for development which provides for (at least) any school buildings required to be accommodated on land released from the Green Belt as part of a general release. This approach will enable any future stages of the design process to approach the masterplanning of the NWH area on a less constrained basis and ensure that the most appropriate mitigation to address any effects can be sought.

## **Draft Statement of Community Involvement**

As part of the consultation we have reviewed the Draft Statement of Community Involvement (DSCI) on behalf of L&G.

The table on page 17 of the DSCI states that for Significant Major Proposals (50 dwellings or more, on land more than 5 hectares, 10,000sqm of non-residential floorspace, development that requires an Environmental Impact Assessment), pre-application consultation is generally recommended in line with that of Major Proposals. These elements appear reasonable and proportionate. However, the DSCI states that for Significant Major Development applications, consideration should be given to the use of Community Charrettes at an early design stage using organisations such as Look! St Albans. We ask that clarification of this process and the expectations for applicants should be included within the DSCI, and that if this recommendation is maintained it is made clear that applicants are free to employ the services of any suitable consultant or organisation. It will be important to understand the expectations around this recommendation, as an addition to the already wide ranging consultation processes. Specifically, we request clarity on how this activity will be coordinated with a Design Review Panel process which is also included within the DSCI.

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### **Conclusion**

We trust the above comments are helpful and will be considered as part of the development of the draft Local Plan. Please do not hesitate to contact Nick Baker or Jennifer Woods to discuss these representations and/or to facilitate discussions with our client.

We also look forward to receiving details of the progress of the future consultation stages of the Local Plan.

Yours faithfully

  
**Lichfields**

Copy

Mike Emmett, Legal & General

Planning Policy  
St Albans Council Offices  
St Peter Street  
St Albans  
Hertfordshire  
AL1 3JW

**Date:** 8 March 2021  
**Our ref:** 60885/01/SSL/JWO/19514859v1  
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Yours faithfully

  
**Lichfields**

Copy

Mike Emmett, Legal & General



**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.

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**By e-mail to:** [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

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

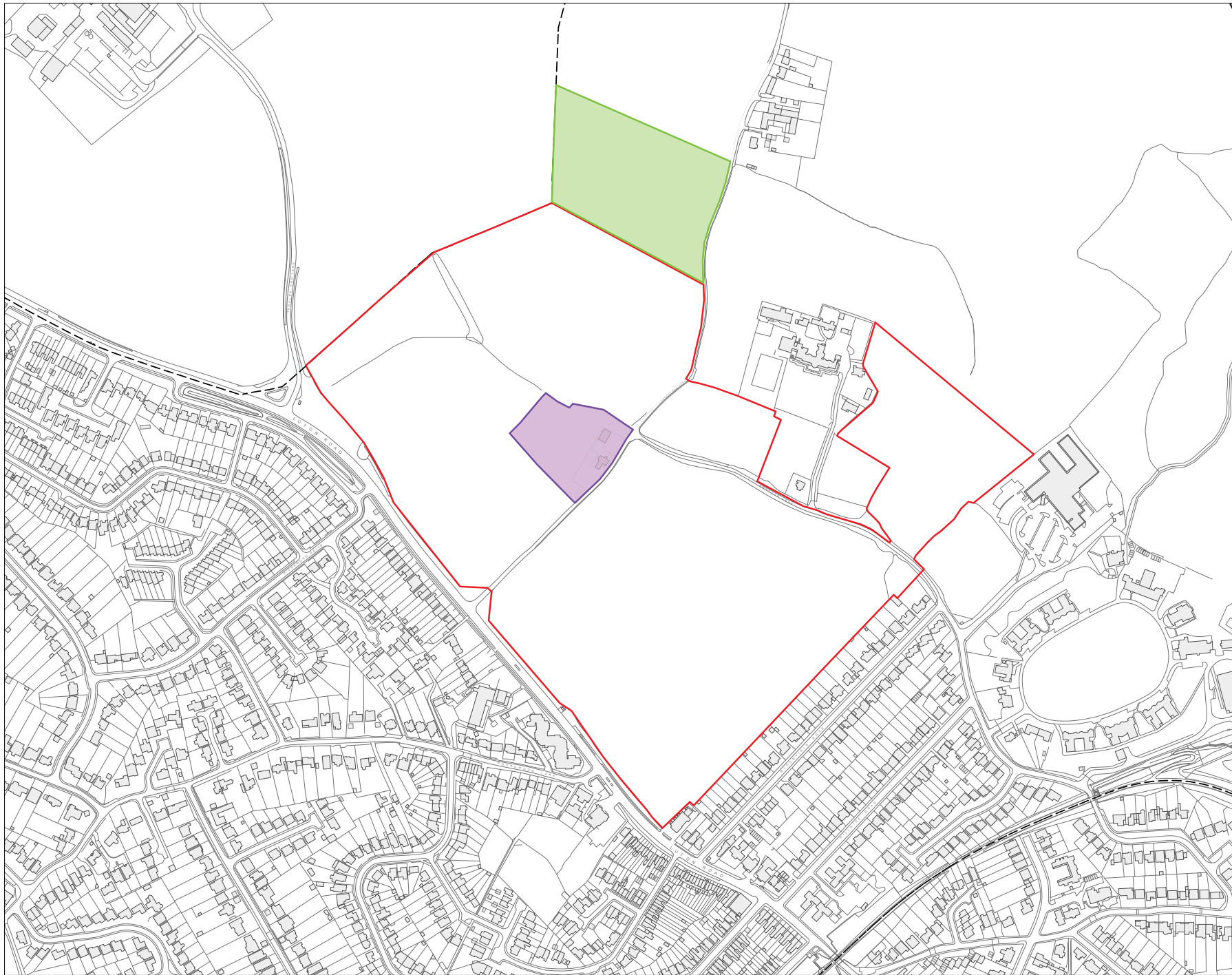
<b>Your Details</b>	
Name	Nick Baker
Company/Organisation	Lichfields on behalf of L&G Strategic Land (Harpenden) Limited
Address	The Minster Building, 21 Mincing Lane
Postcode	EC3R 7AG
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

<b>Site Details</b>					
<b>Requirements:</b> <ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Northwest Harpenden. Please see Site Plan appended to this form.				
Site area (in hectares)	27 hectares (plus additional land for planting)				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table>	Easting		Northing	
Easting		Northing			
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	<div style="background-color: black; width: 100%; height: 20px; margin-bottom: 5px;"></div> Third party land is not required for the delivery of development				
Current land use	The site is undeveloped and is in agricultural use.				
Condition of current use (e.g. vacant, derelict)	The site is undeveloped and is in agricultural use.				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input checked="" type="checkbox"/> Biodiversity Improvement / Offsetting <input checked="" type="checkbox"/> Green Belt Compensatory Land <input checked="" type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify) – <i>Education</i>				

Reasons for suggested development / land use	The proposed land use would predominately be for housing, though other land uses would form part of the wider development, e.g. flexi care units, education and associated infrastructure and amenity space. Please refer to Lichfields' covering letter and appendices for more details.
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Preservation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No- The majority of the site is not in an area at risk of flooding with the exception of an area running parallel to the A1081 Luton Road which is at risk of localised flooding. Initial design work indicates this is not a constraint to development.
	Topography affecting site (land levels, slopes, ground conditions)	<input checked="" type="checkbox"/> Yes-The site slopes down from east/north-east towards the south/south-west with a level change of approximately 20 to 25 metres. To the east, Ambrose Lane enters the site from the south-east at approximately 130 metres AOD with land to the north-east at an elevation of approximately 125metres AOD. To the west/south-west along Luton Road, the site elevation is at approximately 110 metres AOD <input type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	<p>Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).</p>
	<p>Other constraints affecting the site</p>	<p><input checked="" type="checkbox"/> Yes (If yes, please specify)  The site is within the Metropolitan Green Belt.  Though it falls outside of the site, Cooters End Farm is located adjacent to Cooters End Lane towards the northern half of the site. Parts of the two-storey building date from the late 17th Century and the building is Grade II listed.</p> <p><input type="checkbox"/> No</p>
<p>Planning Status</p>	<p><input type="checkbox"/> Planning Permission Granted  <input type="checkbox"/> Planning Permission Refused  <input type="checkbox"/> Pending Decision  <input type="checkbox"/> Application Withdrawn  <input type="checkbox"/> Planning Permission Lapsed  <input checked="" type="checkbox"/> Pre-Application Advice  <input type="checkbox"/> Planning Permission Not Sought  <input checked="" type="checkbox"/> Other – <i>Masterplanned with SACDC under the previous Local Plan Broad Location allocation.</i></p> <hr/> <p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p>The site is currently within the Metropolitan Green Belt and was previously identified for release as one of a number of 'Broad Locations' to meet housing and other development needs by St Albans City and District Council (SACDC) in the now withdrawn draft local plan (and the previous 'Strategic' and 'Detailed' Local Plans drafted in 2014 and 2016. L&amp;G has engaged with the Local Authority having signed up to a Planning Performance Agreement for the site and has had numerous pre-application meetings with the Council, attended public consultations and progressed the site through the Council's Masterplan process.</p>	
<p>Other comments</p>	<p>Please refer to Lichfields' covering letter for more details.</p>	



Notes & Key  
 DIMENSIONS NOT TO BE SCALED FROM THIS DRAWING.  
 CONTRACTOR TO NOTIFY ARCHITECT OF SITE VARIATIONS  
 AFFECTING INFORMATION ON THIS DRAWING.

- Proposed call for sites submission boundary: North West Harpenden  
 Area 27.1ha, excluding purple tinted land not in the client's ownership
- Additional land for planting and mitigation, 2.71 ha
- Land not in the client's ownership

\*Boundary interpolated by GHA onto Ordnance Survey, based on land ownership information received from Legal and General

Date	Rev	By	Details
03.03.21	A	DS	Issued for client review

Location Key



**INFORMATION**

Project  
 North West Harpenden

Client  
 Legal and General

Drawing Title  
 Site Extents - Call for Sites

Drawing No. 2221-A-SK-210303  
 Revision A

Scale 1:2000-A1  
 Date MAR 21  
 Checked AM

**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.

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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.

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



<b>Site Details</b>					
<b>Requirements:</b> <ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Piggotshill Lane, Harpenden				
Site area (in hectares)	1ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td>514996</td> <td>Northing</td> <td>214253</td> </tr> </table>	Easting	514996	Northing	214253
Easting	514996	Northing	214253		
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	████████████████████				
Current land use	Vacant, open land				
Condition of current use (e.g. vacant, derelict)	Vacant				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	Harpenden is the second largest town in the district and is clearly a sustainable location for growth. The report site relates well to the existing built-up area and would form a logical addition to it. There is built development to the north, west and south of the site, with a golf course on the eastern boundary. The impact on the Green Belt is therefore extremely limited.				

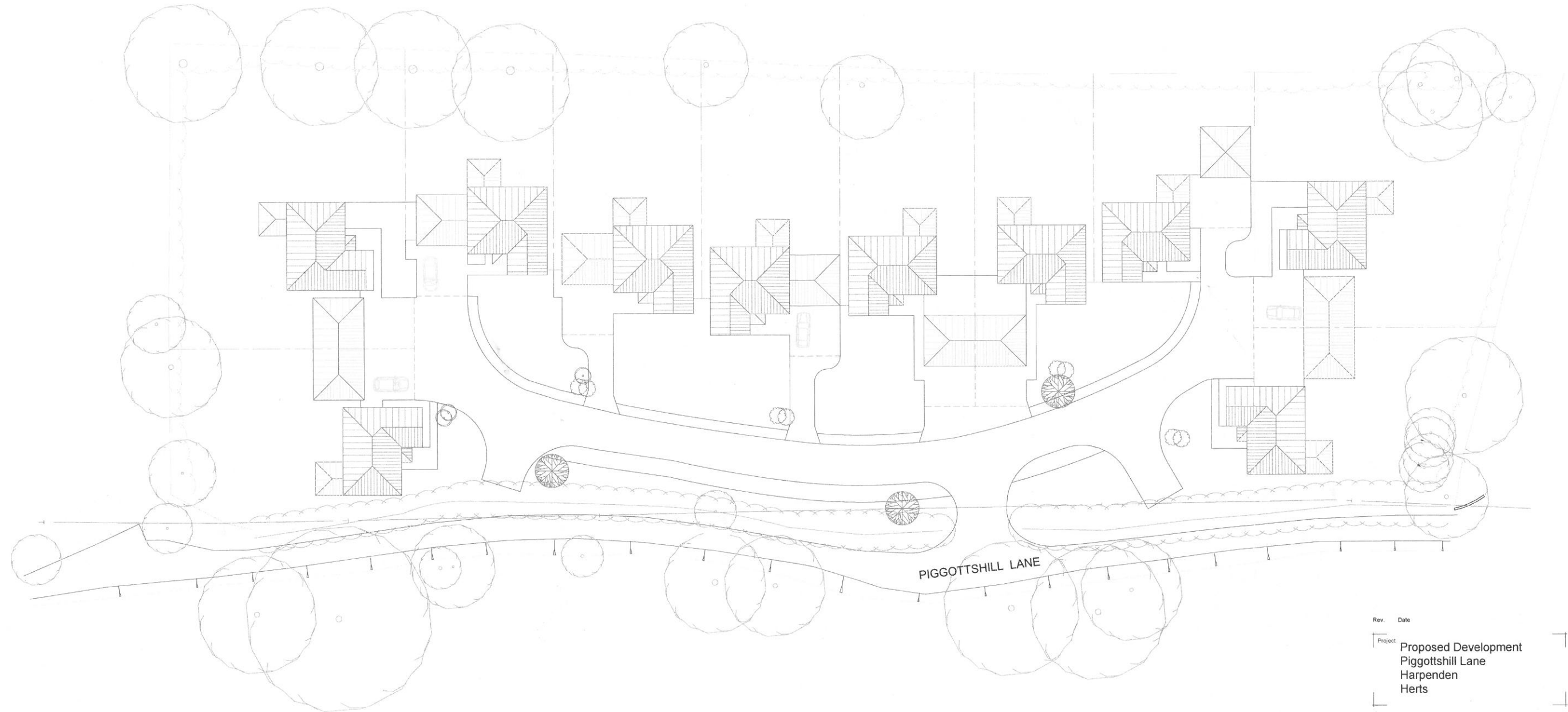
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years
---	--

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

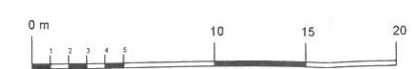
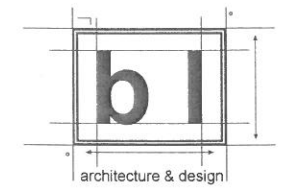
	Other constraints affecting the site	<input checked="" type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No  Other than the designation of the Sewage Works as a County Wildlife Site, the Site and the immediate environment are not subject to international, national, regional or local designations in respect of landscape, ecological, environmental, historic, or townscape quality.
Planning Status	<input type="checkbox"/> Planning Permission Granted <input checked="" type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other  5/11/2414 - Outline planning permission (access) - Erection of six dwellings. Appeal Dismissed – 05/02/2013	
Other comments		

Notes  
 All dimensions to be checked on site prior to the commencement of construction and any discrepancy reported to the construction manager.  
 This drawing may not be reproduced without written consent  
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 Metric drawing all imperial dims approximate subcontractors MUST ensure they have the latest issue drawing before they commence work on site.

Survey By MK Surveys original drawing Ref 15192



Rev.	Date	
Project	Proposed Development Piggottshill Lane Harpenden Herts	
Title	Block Plan	
Scale	1/250 @ A1	Dwg. No
Date	Aug 2017	468-10



The Studio 5 Chequers Cottages  
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## **LAND AT PIGGOTSHILL LANE, HARPENDEN**

St Albans Call for Sites Response 2021

Planning Report on behalf of Hertfordshire Land Ltd

**DLA Ref: 00/081**

**March 2021**

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## 1.0 INTRODUCTION

- 1.1 This report is submitted in response to the Call for Sites on behalf of the owners of the land at Piggottshill Lane. The site is being promoted for residential development.
- 1.2 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 1.3 Harpenden is the second largest town in the district and is clearly a sustainable location for growth. The report site relates well to the existing built-up area and would form a logical addition to it. There is built development to the north, west and south of the site, with a golf course on the eastern boundary. The impact on the Green Belt is therefore extremely limited.
- 1.4 The site is considered suitable for residential development of all forms. One potential option could be for the inclusion within the housing mix of a number of bungalows, which are a much sought-

after commodity yet are generally in short supply and are rarely able to be delivered on non-Green Belt sites on viability grounds.

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

## 2.0 SITE & CONTEXT ANALYSIS

### 2.1.0 Location

The site is situated on the eastern edge of the town of Harpenden as defined by the Local Plan Review, some 1.5km to the east of the town centre. The site is located on the western side of that section of Piggottshill Lane to the north of the roundabout junction with Wheathampstead Road, onto which it fronts and from where it is accessed.

### 2.2.0 Context & Land Uses

This comprises a broadly rectangular site of some 0.96ha of former agricultural land. The site slopes gently downwards from south to north, with a change in level of some 12m across its length of some 160m. The site has a depth of some 60m. It is set to grass, with all the trees / hedges located to the site boundaries. There is a mature hedge to its eastern boundary fronting onto Piggottshill Lane. A linear mixed species wooded area runs along the western boundary with a width of between 12m to 20m.

2.2.1 The northern section of Piggottshill Lane, which includes the Report Site, comprises a two-way rural road of sylvan character. To the south it has an initial width of some 5m to 6m, narrowing to some 4m to the north of High Beeches Primary School (see below). The road does not afford vehicular access to Marquis Lane

to the north of the Water Treatment Works, fixed bollards being located at this junction. The surrounding area includes the following elements:

- Water Treatment Station: This is located to the north of Piggottshill Lane, to both sides of the road, with the main section to west, set behind a well treed embankment.
- Nos. 101 to 109 Piggottshill Lane: Set immediately to the north of the report site, this comprises a frontage of 5 houses, (2 detached and a terrace of 3) fronting directly into the western side of Piggottshill Lane with relatively open frontages. The rear boundaries of these properties reflect the extent of the western boundary of the report site.
- Aldwickbury Park Golf Club: Accessed from Piggottshill Lane opposite High Beeches Primary School, the essentially open Golf Course presents a well treed frontage along the majority of the eastern side of the road.
- Aldwickbury Farmyard: Part of this former farmyard adjacent to the Wheathampstead Road roundabout junction was redeveloped for housing around 10-15 years ago and comprises a low density spacious development of detached 1.5 storey houses of traditional pitched roof design.



- Alzey Gardens: Located to the south of the Report Site and accessed from Piggottshill Lane/Wheathampstead Road roundabout, this comprises a snaking cul-de-sac development of predominantly semi-detached houses, of simple gable fronted and compact design. Those dwellings adjacent to Piggottshill Lane present their rear gardens onto this well screened frontage.
- Hilltop Walk: Located to the south of the report site, this comprises a recent development of detached and terraced 2.5-storey, pitched roof houses, characterised by short front gardens, modest rear gardens and which is dominated by areas of hardstanding. The rear gardens of the adjacent terraced houses have a return onto Piggottshill Lane, and which are well screened by mature tree and hedge growth.
- High Beeches Primary School: Located to the south of the Report Site, the field to this community primary school abuts the western side of Piggottshill Lane to the rear of a tree and scrub screen.
- Ashwell Park and Waldegrave Park: Forming part of a larger suburban area to the west of the Report Site and without vehicular access onto Piggottshill Lane, albeit there is pedestrian access, this comprises a development of compact, 2-storey terraced houses of simple pitched roof design. Those adjacent to Piggottshill Lane are

orientated to back onto the western side thereof and are well screened.

- Harpenden Indoor Bowls Club/Scout Hut: Accessed from Waldegrave Park, these single storey premises are located adjacent to the western boundary of the report site. The premises are of utilitarian, pitched roof design and corrugated sheet metal construction, having the appearance of warehouses. A well treed area of public open space, known as Crabtree Fields adjoins to the west, beyond which is further housing. There is an overgrown access to the site from Piggottshill Lane, immediately to the south of the report site.

#### 2.3.0 Access

There is an existing access from Piggottshill Lane, situated to the north of the midpoint of that frontage. A new gate was recently erected to provide easier vehicular access to the site for maintenance purposes.

#### 2.4.0 Development Plan Notation

The proposals map of the St Albans District Local Plan Review 1994 shows the Site within the Metropolitan Green Belt (MGB), adjacent to the defined urban area of Harpenden.

### 2.5.0 Local services

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

Facility	Local Provision	Proximity to site (km)
<b>Education</b>	High Beeches Primary School	310m
	Aldwickbury School	450m
	Crabtree Infant School	1 km
<b>Retail</b>	Variety of local shops at Grove Road	1.2 km
	Harpenden Town Centre	2.2 km
<b>Health</b>	Southdown Dental Practice	1.2 km
	Manor Pharmacy	1.2 km
	The Elms Medical Practice	2.3 km
	Harpenden Memorial Hospital	2.4 km
<b>Sport/Leisure</b>	Bowls Club	140m
	Public Open Space	140m
	Scout Hut	175m
	Lea Valley Walk/National Cycle Route 57	430m
	Aldwickbury Park Golf Club	560m
<b>Employment</b>	Southdown Employment Site	1.4 km
	Harpenden Town Centre	2 km

### 2.6.0 Accessibility

The Report Site is well served by public transport services and also benefits from excellent access to a good range of local services and facilities as set out below.

#### 2.6.1 Public Transport

The nearest bus stop is located some 250m to the south-west at the junction of Aldwickbury Crescent and Ashwell Park, on route HA1 and 307.

2.6.2 Harpenden Railway Station is located some 2.2km to the west of the application 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.



Figure 1: Location of the Site



Figure 2: Aerial Imagery of the Site

## 3.0 STRATEGIC CONTEXT

- 3.1 This Call for Sites opportunity marks the start of a new Local Plan process. With the withdrawal of the draft Local Plan in 2020 following the withdrawal of the Strategic Local Plan in 2017, the need for an up-to-date strategic framework for development is more urgent than ever.
- 3.2 The objectively assessed housing need for St Albans district is around 900 dwellings per year. This should be the starting point. However, the Council will also be aware of neighbouring authorities that are struggling to meet their own housing requirements. The Council will need to have open and constructive dialogue with these authorities if it is to satisfy the Duty to Cooperate. The potential for St Albans district to assist with meeting housing needs from surrounding areas should not be dismissed at this stage. There is considerable development potential within the district, partly stemming from the fact that Green Belt boundaries have not been properly reviewed for around 35 years. The Council should not see the 900 homes per year target as a ceiling if greater potential emerges through the Green Belt review or other evidence.

### Housing need

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

### The portfolio of housing sites

- 3.5 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.

3.6 The previous focus only on strategic sites of 500 dwellings or more must change. As highlighted by the Inspectors examining the now-withdrawn draft Local Plan, and as recognised by the Council's Planning Portfolio holder, small and medium-sized sites within the Green Belt must be seriously considered.

**Green Belt considerations**

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

## 4.0 PLANNING HISTORY

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

LPA Reference	Proposal	Decision
5/11/2414	Outline planning permission (access) - Erection of six dwellings	Appeal Dismissed – 05/02/2013

## 5.0 PREVIOUS SHLAA ASSESSMENT

- 5.1.0 This site has been submitted through previous Call for Sites invitations and was assessed by the Council in the 2016 Strategic Housing Land Availability Assessment (SHLAA).
- 5.2.0 The 2016 SHLAA update concludes that the site is suitable in principle for residential development. We support the SHLAA's conclusions in respect of this site.
- 5.3.0 The 2016 SHLAA also concluded that the site should be removed from the Green Belt in association with other land to the north. While this is the most logical solution, the site could also be removed in isolation from the land to the north. An alternative Green Belt boundary could be drawn along Piggottshill Lane, as shown in Section 8 below.

## 6.0 SITE CONSTRAINTS

6.1.0 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.

### 6.2.0 Contamination/Pollution

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

### 6.3.0 Environmental issues

Other than the designation of the Sewage Works as a County Wildlife Site, the Site and the immediate environment are not subject to international, national, regional or local designations in respect of landscape, ecological, environmental, historic, or townscape quality.

### 6.4.0 Flood risk

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

### 6.5.0 Topography

The site slopes gently downwards from south to north, with a change in level of some 12m across its length of some 160m.

### 6.6.0 Utility services

Further investigation is needed as to which utility connections are available but this is not expected to be a barrier to development, particularly since there is built development on three sides of the site, all of which benefit from services.

### 6.7.0 Legal issues

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

### 6.8.0 Access

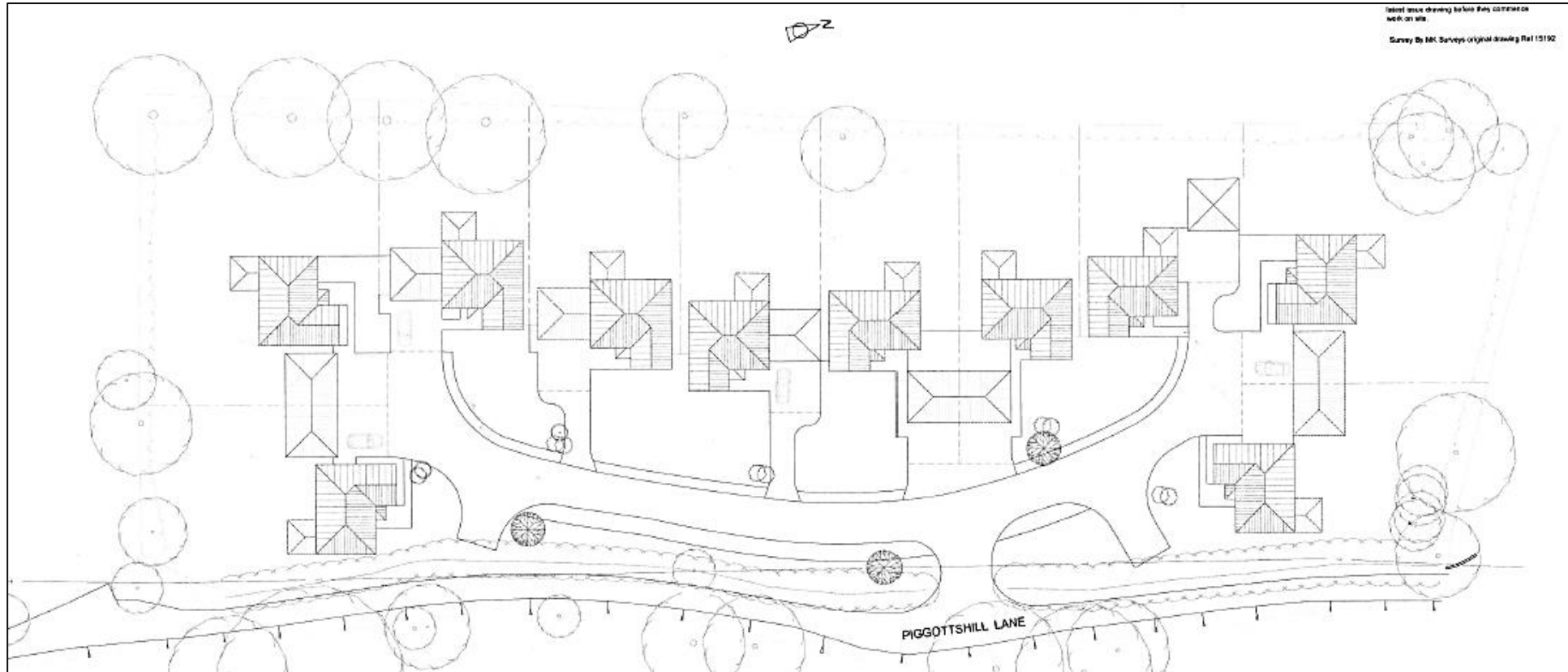
The existing access from Piggottshill Lane, situated to the north of the midpoint of that frontage, has recently been renewed and although it provides good access for field maintenance purposes, access will need enhancing to facilitate development. However, neither the Council nor the Planning Inspector considering application 5/11/2414 for 6 dwellings raised any transport objection to the proposal.



## 7.0 OUTLINE OF PROPOSAL

- 7.1.0 The site is considered suitable for residential development of all forms, accessed from Piggottshill Lane. An indicative layout has been produced showing a development of 10 dwellings (see Figure 3 below). The properties are arranged in an informal manner around an access road running parallel with Piggottshill Lane. The large front gardens and communal green space around the access road will complement the verdant character of Piggottshill Lane. The dwellings could be in the form of two-storey dwellings and could include some bungalows.
- 7.1.1 The site is surrounded by built development on three sides, with a golf course opposite. This severely restricts any contribution the site makes to the purposes of the Green Belt. It is adjacent to the current built-up area of Harpenden and would be a sensible addition to it.
- 7.1.2 There are no designations that would prevent development of the site. The site is in single ownership and could be brought forward for development quickly. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.
- 7.1.3 Moreover, the potential provision of retirement bungalows as part of the housing mix responds to a specific need that can rarely be satisfied by non-Green Belt sites because of viability constraints.

8.1.0 Paragraph 134 of the NPPF states that the Green Belt serves five purposes. These five purposes have been set out below with an



8.0

### GREEN BELT IMPACT

assessment on the site's contributions to each purpose.

Figure 3: Proposed Site Layout (not to scale)

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

The Council's latest Green Belt Review (2013) concluded that Harpenden was not one of the "large built-up areas" to which this purpose applies. For this reason, the wider parcel of land within which the report site sits was considered by the Council's consultants to make "limited/no contribution" to this purpose.

8.2.1 In terms of the report site itself, by virtue of its nature and that of its surroundings it would not result in urban sprawl and is not necessary to keep permanently open. There is built development to the north of the site, comprising a residential frontage of five dwellings and the water treatment works. To the south is the suburban residential development at Waldegrave Park. To the western boundary the site adjoins Harpenden Indoor Bowls Club and Scout Hut.

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

There are no towns within 5 miles to the north east of Harpenden and on this basis the proposal would not foster the coalescence of Harpenden with any nearby towns. Neither would there be any extension of the line of development further eastwards towards Wheathampstead over that existing. It would thus not change the current gap between settlements or add to the perception of coalescence. The site is considered to make no contribution to this Green Belt purpose.

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

Whilst the Report Site itself is of open character, it is very well related to Harpenden and the surrounding pattern of development, adjoining existing built development on 3 sides, whilst reflecting the spread of development to the east. As such there would be no encroachment beyond the established lines of development and the development of this site would have very little impact in respect of this Green Belt purpose.

8.5.0 **Purpose 4 – to preserve the setting and special character of historic towns.**

The land does not form part of the setting of Harpenden or contribute to its special character. The site is considered to make no contribution to this Green Belt purpose

**8.6.0 Purpose 5 – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

The Council’s 2013 Green Belt Review did not assess parcels of land against this purpose since it was established that all parcels would perform equally well and any attempt to differentiate would be meaningless (SKM Review, November 2013, paragraph 5.2.20).

**8.7.0 Summary of harm to Green Belt**

As is accepted in the Council’s 2009 SHLAA assessment, the release of the Report Site as part of the wider area proposed in this Report would result in a clearer and more permanent boundary. The continuation of the settlement boundary to the south of the Report Site, along the western side of Piggottshill Lane, linking in with that existing to the north to Marquis Lane would thus square off this section of the town, marking a clear distinction with the more generally open land to the eastern side of Piggottshill Lane. As such, it is considered that the harm amounting from the site’s removal from the Green Belt would be extremely minimal.

**8.8.0 New position of Green Belt boundary**

It is proposed to amend the defined eastern boundary to Harpenden. In common with the residential land to the south already included within the urban area, the proposed boundary would follow the line of the western side of Piggottshill Lane northwards to the junction with Marquis Lane, so as to incorporate the Report Site; the Harpenden Indoor Bowls Club/Scout Hut and area of open space (Crabtree Fields) to the east; and the Sewage Works to the north, so as to in effect square off this part of Harpenden. An alternative boundary is also shown on Figure 4 below that just removes the report site from the Green Belt.



Figure 4: Existing and Proposed Green Belt Boundary

## 9.0 CONCLUSIONS

9.1 This report is submitted in response to the Call for Sites on behalf of the owners of the land at Piggottshill Lane. The site is being promoted for residential development.

9.2 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.

9.3 Harpenden is the second largest town in the district and is clearly a sustainable location for growth. The report site relates well to the existing built-up area and would form a logical addition to it. There is built development to the north, west and south of the site, with a golf course on the eastern boundary. The impact on the Green Belt is therefore extremely limited.

9.4 The site is considered suitable for residential development of all forms. One potential option could be for the inclusion within the housing mix of a number of bungalows, which are a much sought-

after commodity yet are generally in short supply and are rarely able to be delivered on non-Green Belt sites on viability grounds.

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

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

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

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

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

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

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

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

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

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

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

**Please do not submit sites that:**

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

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

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

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

**By online consultation portal:**

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


**By e-mail to:** [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

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

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

<b>Your Details</b>	
Name	Anne James [REDACTED]
Company/Organisation	
Address	18 Pickford Hill Harpenden, Herts
Postcode	AL5 5HD
Telephone	[REDACTED]
Email	[REDACTED]
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other



<b>Site Details</b>					
<b>Requirements:</b>					
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	175 Westfield Road, Harpenden, Herts AL5 4ND Land on the junction Lower Luton Road/ Bowers Heath Lane				
Site area (in hectares)	0.25ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table>	Easting		Northing	
Easting		Northing			
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input type="checkbox"/> No				
Landownership (please include contact details if known)					
Current land use	Builders Merchants/Landscape gardeners				
Condition of current use (e.g. vacant, derelict)	In use				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input checked="" type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	The land would make a valuable contribution towards the District's 5YLS or employment land.				

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

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

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other	
Other comments	Please include details of the above choice below (for example planning reference numbers and site history)	

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 03 February 2021 shows the state of this title plan on 03 February 2021 at 12:54:45. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

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MB 25

H.M. LAND REGISTRY

TITLE NUMBER

HD 102874

ORDNANCE SURVEY  
PLAN REFERENCE

TL 1215/1315, 1216/1316

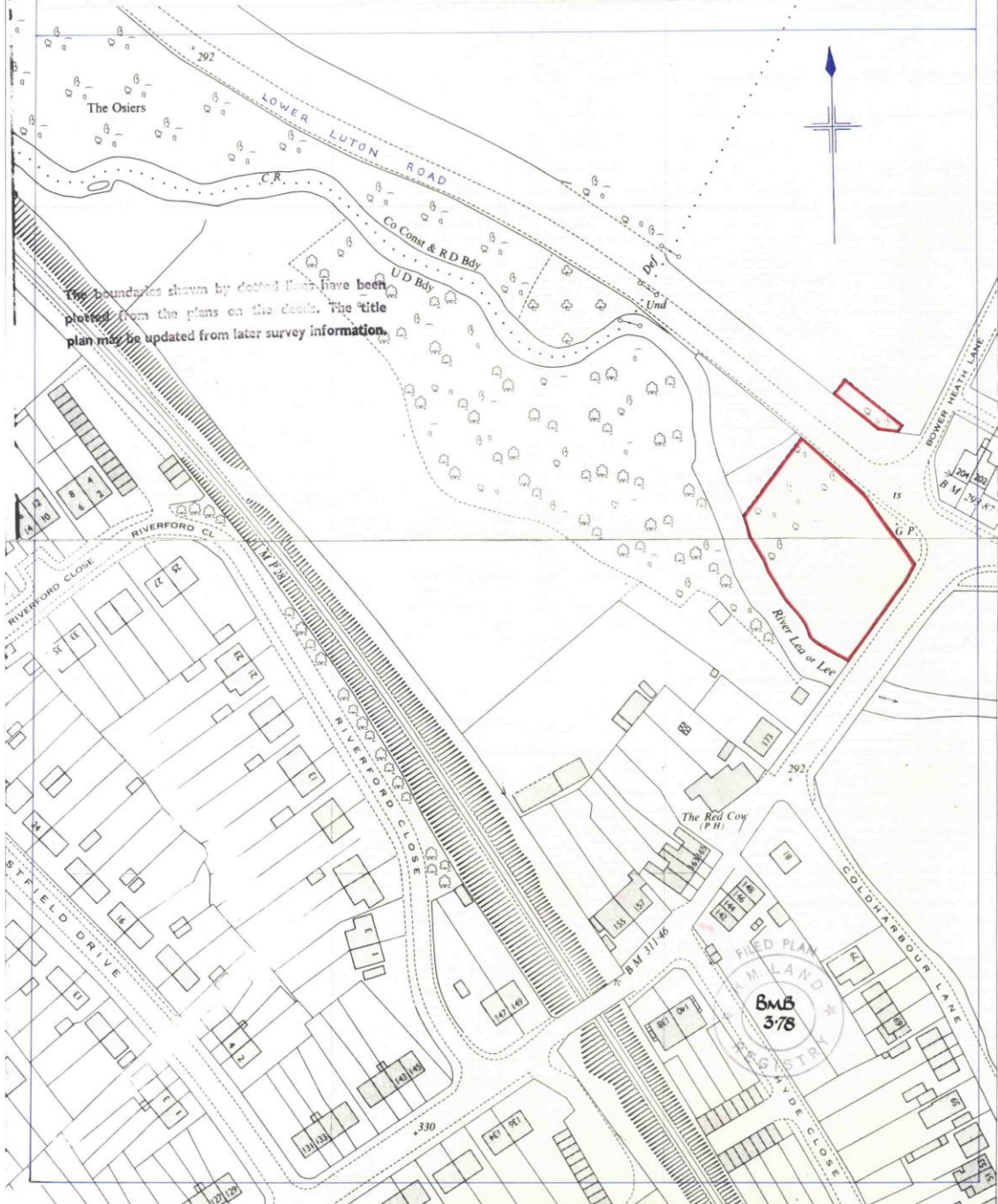
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COUNTY HERTFORDSHIRE

DISTRICT

ST. ALBANS

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## **25 January to 5pm 8 March 2021**

### **'Call for Sites 2021' Site Identification Form**

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

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

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

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

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

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

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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
- 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.

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**By e-mail to:** [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

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

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

<b>Your Details</b>	
Name	Greg Blaquiere
Company/Organisation	Terence O'Rourke Limited
Address	23 Heddon Street
Postcode	W1B 4BQ
Telephone	
Email	
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

<b>Site Details</b>					
<b>Requirements:</b> <ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Townsend Lane, Harpenden				
Site area (in hectares)	1.654ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td>512223</td> <td>Northing</td> <td>214442</td> </tr> </table>	Easting	512223	Northing	214442
Easting	512223	Northing	214442		
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
Landownership (please include contact details if known)	Lawes Agricultural Trust				
Current land use	Agricultural				
Condition of current use (e.g. vacant, derelict)	Vacant				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	The site is strongly associated with the existing built development to the north, east and south and perceived within the settlement envelope. Other than being located within the green belt which we address further in the 'Other comments' section below, there are no other planning or minerals/waste designations on the site. There are no flood risk, heritage, or environmental constraints on the site. The site is suitable for residential development.				



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

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

	Other constraints affecting the site	<input checked="" type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No  The site is in the Green Belt and therefore needs to be released through the local plan process. The site is also within the Rothamsted Plateau and Kinsbourne Green Landscape Character Area (Hertfordshire County Council Ref: 099).
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input checked="" type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other  Please include details of the above choice below (for example planning reference numbers and site history)  There is no planning history of relevance specific to the development of this site.	

<b>Other comments</b>	<p>The site is suitable for removal from Green Belt through the Local Plan process for the following reasons:</p> <ul style="list-style-type: none"><li>• Development of this section of land would not harm the purposes of the wider Green Belt given its visual containment and the fact that it is developed on three sides.</li><li>• The site makes a limited or no contribution towards the purposes of Green Belt.</li><li>• The development of the site would present the opportunity for a 'strong green edge' to the western side of the site adjoining the open countryside, which would strengthen the boundary between the settlement and the green belt.</li><li>• The site is not subject to physical or environmental constraints that would affect development.</li><li>• It is anticipated that it would be possible to deliver new homes from Q4 2025, and therefore the site could contribute to meeting housing needs of St Albans City and District, including the local needs of Harpenden, early in the Plan period.</li><li>• The site is suitable and available for development, is in the hands of a house builder with a track record of delivery and is fully achievable.</li></ul>
-----------------------	---



TERENCE  
O'ROURKE

Chris Briggs  
Spatial Planning Manager  
St Albans City and District Council  
District Council Offices  
St Peter's Street  
St Albans  
Hertfordshire  
AL1 3JE

*Issued by email:*

8 March 2021

Our Reference: TOR/239102

Dear Mr Briggs,

**St Albans City and District Council  
Call for Sites 2021 – Housing, Gypsy and Travellers, Mixed Use,  
Employment, Renewable and Low Carbon Energy and Heat, Biodiversity  
Improvement / Offsetting, Green Belt Compensatory Land, Land for Tree  
Planting and 'Other' uses.**

**Land at Townsend Lane, Harpenden**

On behalf of Hill Residential Limited (Hill) and its interest in the Land at Townsend Lane, Harpenden, we submit the enclosed information and comments to the St Albans City and District Council (SADC)'s Call for Sites consultation with accompanying documentations including:

- Submission to the SADC's Call for Sites Report, March 2021 and associated appendices
- Briefing note for the case of Exceptional Circumstances
- 'Land at Townsend Lane' Promotional Document
- A copy of the consultation form (submitted online via the portal).

Hill has been selected as development partner for Land at Townsend Lane by the Lawes Agricultural Trust (the Trust). The Trust is a registered charity that aids the advancement of agricultural science through providing support for Rothamsted Research (Rothamsted), the oldest agricultural research station in the world, located in Harpenden. The Trust owns the land and buildings at Rothamsted, provides annual research grants and makes capital grants to help complete and to modernise the facilities at Rothamsted.

Land at Townsend Lane represents a small-scale, sustainable site where exceptional circumstances are considered to exist, which presents an opportunity for the site to be removed from the Green Belt, which have been identified in detail within the attached Briefing Note. Land at Townsend Lane offers the Council an

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Enterprise House  
115 Edmund Street  
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Everdene House  
Deansleigh Road  
Bournemouth  
BH7 7DU

**TELEPHONE**  
020 3664 6755

[www.torltd.co.uk](http://www.torltd.co.uk)



available site which can be delivered within the early part of the Plan period and was identified within the SHLAA Update 2016 (site reference 97). A detailed planning report together with a Landscape and Visual Appraisal were submitted previously to inform the SHLAA Update process in March 2016.

The site has been promoted throughout the previous Draft Local Plan processes, most recently for the Local Plan 2020-2036 Examination ahead of the Plan being withdrawn in November 2020. In support of the promotion of the site detailed work was undertaken since the initial response to the Call for Sites in 2016. This includes preparation of the following technical documents:

- Site location plan
- Indicative Site Layout
- Landscape and Visual Impact Assessment
- Access Appraisal
- Agricultural Land Classification Report
- Historic Environment Desk-Based Assessment
- Site Investigation
- Utilities and Services Report
- Combined Site Check Survey
- Flood Risk Assessment
- Preliminary Ecological Assessment
- Bat Survey
- Reptile Survey
- Arboricultural Impact Assessment.

These reports highlight that there are no constraints identified which would prevent development on the site. Whilst those reports were produced to support previous local plan representations, their findings hold good. Site conditions will continue to be monitored and reports updated as necessary. Whilst submitted as part of the representations to the Draft Local Plan 2020-2036 and previous Call for Sites exercises, these documents have been included as the appendices and are enclosed for completeness and ease of reference. The documents have previously been included within other representations dating back to March 2016.

The site has previously been promoted in response to Harpenden Town Council's Neighbourhood Plan Call for Sites (April 2017) and presented to the Town Council on 28 July 2017 before a representation was made to the subsequent Regulation 14 and Regulation 16 Draft Neighbourhood Plan consultations (December 2017 and June 2018). In addition to the above-mentioned reports, a presentation was prepared which included indicative site layouts illustrating the potential for development on the site to deliver 41 and 46 dwellings.

The attached report and briefing note presents the case of exceptional circumstances at Land at Townsend Lane. In summary, the site is well suited to residential development which would make a positive contribution to the local area and meeting housing needs for the area, and it should be removed from the Green Belt for the following reasons:

- 1) Development of this section of land would not harm the purposes of the wider Green Belt given its visual containment and the fact that it is developed on three sides.



- 2) The site makes a limited or no contribution towards the purposes of Green Belt.
- 3) The development of the site would present the opportunity for a 'strong green edge' to the western side of the site adjoining the open countryside, which would strengthen the boundary between the settlement and the green belt.
- 4) The site is not subject to physical or environmental constraints that would affect development.
- 5) It is anticipated that it would be possible to deliver the first new homes by Q4 2025, within 2 years of adoption of the local plan, and therefore the site could contribute to meeting housing needs of St Albans City and District, including the local needs of Harpenden, early in the plan period.
- 6) The site is suitable and available for development, is in the hands of a house builder with a track record of delivery and is fully achievable.

The above, on their own, represent the exceptional circumstances necessary to justify the site's removal from the Green Belt and its allocation for residential development. In addition, the release of the land would assist to meet local housing needs and would support the wider strategy of the Trust, to generate investment in Rothamsted, significantly and demonstrably outweighing any potential harm to the Green Belt in this location.

I trust that the above and enclosed information is clear, however please contact me should you require any further information or clarification.

Yours sincerely,

**Greg Blaquiere**  
Technical Director

cc Mr C Campbell, Hill Residential  
Mr P Oxley, Lawes Agricultural Trust

Enc.

Call for Sites – Representation Report, March 2021

Call for Sites – Exceptional Circumstances for Green Belt Release Note

Call for Sites – Site Identification Form

Enc. (download link):

- Appendix 1 'Land at Townsend Lane' Promotional Document
- Appendix 2 Conceptual Site Layout
- Appendix 3 Indicative Site Layout
- Appendix 4 Landscape and Visual Impact Assessment
- Appendix 5 Access Appraisal
- Appendix 6 Agricultural Land Classification Report
- Appendix 7 Historic Environment Desk-Based Assessment



- Appendix 8 Site Investigation
- Appendix 9 Utilities and Services Report
- Appendix 10 Combined Site Check Survey
- Appendix 11 Flood Risk Assessment
- Appendix 12 Preliminary Ecological Assessment
- Appendix 13 Bat Survey
- Appendix 14 Reptile Survey
- Appendix 15 Arboricultural Impact Assessment
- Appendix 16 Hill Residential development case studies



## The Case of Exceptional Circumstances

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**Project:** Land at Townsend Lane      **Date:** March 2021

---

**Subject:** Call for Sites-  
Exceptional Circumstances      **Reference:** 239102  
for Green Belt Release

---

### Introduction:

This briefing note accompanies the Call for Sites Cover Letter, Submission Report, Site Identification Form and the enclosed supporting and technical documents, promoting Land at Townsend Lane, Harpenden for proposed residential development.

Given the nature of St Albans district, if housing needs are to be met, land will need to be released from the Green Belt. NPPF paragraph 136 allows alterations of Green Belt boundaries as part of Local Plan preparation or review where “exceptional circumstances” exist. NPPF paragraph 138 states *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”*.

Paragraph 139 further states *“When defining Green Belt boundaries, plans should: ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development.”* Given the significant level of housing need, the pressing need for affordable housing, that all of the land outside the district’s urban areas is Green Belt and that those urban areas cannot accommodate the need for new homes, Hill Residential Limited (Hill) agrees that the exceptional circumstances exist to justify a review of the Green Belt.

It follows that where land can be released from the Green Belt without significant harm to its purposes, that land should be released from Green Belt and either allocated for development, or reserved in case it is required to meet development needs beyond the plan period. Further, there is also a need to assess land for sustainability which must be considered at the site level to ensure that where land is proposed to be removed from the Green Belt, that the resulting development will still be capable of being considered as sustainable, compared to reasonable alternatives.

There is a need for a consistent, clear and fully evidenced and justified approach to Green Belt analysis, as was requested by the Inspectors conducting the Examination into the previously submitted St Albans City and District Local Plan. Such finer grain analysis of Green Belt has been requested by other Inspectors, for example at Welwyn & Hatfield to ensure the strategy was sound.

In order to ensure the housing strategy is sound, meet the Full Objectively Assessed Need (FOAN), including affordable housing delivery and support for the local economy, a fine-grain assessment is required. Such a review is likely to identify small to medium scale sites (10 – 200 units) which can be released without significant detriment to Green Belt purposes. Such



sites are more likely to ensure the delivery of the housing need from early in the Plan period, allowing time for the larger scale strategic sites to come on stream.



The supporting and technical documentation, enclosed within this submission, present a sound, robust assessment of the site context which concludes that the contribution to the Green Belt is minimal, and that low-rise residential development will maintain the openness of the Green Belt. Whilst these reports were previously submitted as part of previous local plan exercises, their findings hold good. The site will continue to be monitored and updates and/or further studies can be undertaken as necessary. It is maintained that a finer-grain review will identify the site at Townsend Lane as suitable for release from the Green Belt.

In the event that such a review still concludes that release would be harmful to Green Belt purposes, the Council needs to consider and weigh the additional benefits that such a release would bring as part of a wider strategy in support of the work of the The Lawes Agricultural Trust (the Trust) and Rothamsted Research (Rothamsted), playing a part in funding vital improvements to the estate in order to attract and retain research staff and students in a globally competitive environment. These considerations would also represent additional exceptional circumstances to justify the site's release from the Green Belt.

#### Overview:

The Trust is a registered charity that aids the advancement of agricultural science through providing support for Rothamsted, the oldest agricultural research station in the world, which is located in Harpenden. The Trust owns the land and buildings at Rothamsted, provides annual research grants and makes capital grants to help complete and to modernise the facilities at Rothamsted. The accumulated research records and soil and crop samples collected over 175 years make Rothamsted unique. It is an institution of not just national but international significance.

The Trust owns several land titles in the local area including the site at Townsend Lane. The site is approximately 1km north of Rothamsted Research buildings and in sole ownership of the Trust. Due to its peripheral location and potential for trespass, the site has never been incorporated into any long-term research project of Rothamsted Research. Development of the site would benefit Harpenden, not only helping contribute to the local housing need but also would play a part, along with other land owned by the Trust, in supporting the continued investment in the vital and internationally renowned work at Rothamsted by enabling continued development of facilities and accommodation, attracting students and staff to the area. This would support Hertfordshire Local Enterprise Partnership's (LEP) number 1 priority to maintain global excellence in science and technology, as set out within their Strategic Economic Plan 2017-2030.

The site area is 1.654 hectares and located on the western edge of Harpenden. The site is currently in agricultural use, although as indicated above has more limited value for research purposes than other areas of the estate.

The site is bounded to the east and south-east by residential development. Located directly opposite the site, on the eastern side of Townsend Lane is a row of two storey detached dwellings, leading north to the junction with Claygate Avenue which also consists of a row of two storey detached dwellings. This is largely consistent with the general form and layout wider development pattern towards Harpenden town centre to the east. To the immediate south of the site is Hartwell Gardens which comprises a housing development of greater density than the immediate locality, arranged with less uniformity, responding to the cul-de-sac road layout.

Immediately to the north-western edge of the site lies a plant nursery and beyond this is the local primary school of Roundwood. The south-western boundary borders the countryside.



An annotated indicative sketch is included with the submission to illustrate a type of development that could be provided.

### Green Belt Review

Paragraph 136 of the NPPF states 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.'*

Case law demonstrates that a number of factors may amount to exceptional circumstances, either individually or when combined together. Five tests were undertaken by the Hon. Mr Justice Jay in *Calverton Parish Council v Greater Nottingham Councils* [2015] EWHC 10784 which set out a number of matters that should be identified and dealt with in order to ascertain whether 'exceptional circumstances' exist to justify the release of land from the Green Belt. In the absence of a definition of exceptional circumstances in national policy, these tests have been used by a number of the authorities to determine whether the release of Green Belt in each instance was appropriate. The five tests established by Hon Mr Justice Jay are considered below in order to determine whether exceptional circumstances exist to amend Green Belt boundaries.

#### ***Test 1: the acuteness/intensity of the objectively assessed need (matters of degree may be important)***

Despite strong housing pressures and demands, there has historically been under-delivery of new homes to meet local housing need in St Albans City and District Council (SADC). As evident from the most recent Housing Delivery Test (HDT) results, covering the period 2017-2020, only 63% of the identified need has been achieved in SADC. The HDT states that SADC need to deliver 820 homes for 2019-20 and only 442 were delivered. Further the recent South West Hertfordshire Local Housing Needs Assessment (2020) identifies a need for 893 homes per annum in the period 2020-2030, which draws upon the Government set standard methodology figure for the district.

SADC previously acknowledged in order to meet housing needs that approximately 9-10,000 homes will need to be delivered on land currently within the Green Belt. With the continuation of under-delivery, the need is likely to be increased as the new Local Plan is prepared. The Council stated within a meeting regarding the progress of the new Local Plan on 22 February 2021 that it is anticipated that around 10,000 homes will need to be delivered within the Green Belt, this is not a definite figure at this stage and will need to be confirmed however it is at the higher end of the position for the previous Local Plan.

With regards to affordability, SADC is one of the most expensive Districts to live in the UK. In 2019, the ratio of median house price to median gross annual workplace-based earnings stood at 16.09, making it the least affordable district in the East of England, the 4<sup>th</sup> outside London and 13<sup>th</sup> nationally. The median house price in the District stood at £530,000 in September 2019. In addition, affordable housing delivery has fallen significantly short across the period of 1994-2020, averaging just 69 per annum against the 200 per annum policy objective.

In addition, the Housing Needs Assessment 2020 estimates the need for affordable housing in the 2020-2036 period. The analysis is split between affordable housing to rent, which is 443 per annum and affordable home ownership in which St Albans need is 385 per annum.



There has clearly been a persistent unmet housing need within SADC. The scale of need, especially which cannot be met within the urban area, combined with current market conditions indicate that there is an acuteness of need for housing in SADC. Therefore, it is considered that this first test in respects of demonstrating the acuteness of needs in relation to housing is passed.

Given the significant affordability pressures in SADC, there is an urgent need to put in place an adopted plan, release land from the Green Belt and ensure that increased delivery can begin to be achieved as early as possible. Land at Townsend Lane is immediately available for development, it can make an early contribution to help address housing need and be delivered within the first five years of the plan.

***Test 2: the inherent constraints on supply/availability of land prima facie suitable for sustainable development***

All of the land outside the District's urban areas is Green Belt and the urban areas cannot accommodate the need for new homes. The character of the District has been shaped by the existing landscape and influenced heavily by the Green Belt, which covers over 81% of the District. The character of the main settlements in the District mean that significant increases in density and height are unlikely.

SADC's Green Belt Topic Paper (2019) prepared for the Examination sets out the Council's investigation of the capacity of the existing urban areas including suitable brownfield sites and underutilised land and whether this has been maximised having regard to optimising densities; obtaining information on other available sites in discussions with neighbouring authorities; and considering if there is any non-Green Belt rural land which could meet any of the unmet need.

This step was undertaken through the housing trajectory/land supply data in the draft LP (2018) to fully explore non-Green Belt potential sources of housing.

The total capacity from all of these sources was circa 5,000 homes, clearly far short of the 14,608 homes set out by the Government's standard methodology for housing need at the time, and even further short of the recent Housing Needs Assessment (2020) figure which equates to 16,074 homes over the new plan period 2020-2038.

Further, there is no non-Green belt rural land within this District. the District is wholly bounded by the Green Belt (i.e. there is no non-Green Belt rural land) and Duty to Cooperate discussions with adjoining and nearby authorities to this date have shown no reasonable prospect of the District's housing need being met elsewhere at this point in time.

It is clear that housing needs cannot be met within the existing urban areas. The above indicates the scale of unmet needs which could only be met through a review of the Green Belt and release of land.

It is concluded that there is an inherent constraint on land supply outside the Green Belt within the District and also within other neighbouring authorities, which means that it is not possible to meet the need for housing on suitable and sustainable sites without giving consideration to the current extent of the Green Belt. Overall, housing Test 2 is therefore

passed, as it can be demonstrated that there is an inherent constraint on land suitable for sustainable housing development.



Land at Townsend Lane is inherently sustainable due to its location on the western edge of the town of Harpenden. The site is in a highly sustainable location within walking and cycling distance to essential local facilities such as schools, shops, local facilities, amenities and public transport. Its location close to the centre of Harpenden means the site would be suitable for people of all ages, and at all stages of life. Appendix 1 enclosed with this submission further evidences the sustainable location as part of the site appraisal and impact on the Green Belt.

There is either limited or no harm on the open character and objectives of the Green Belt and there are no site-specific constraints that would prevent development of the site. The development of Townsend Lane would conform to the strategic aim for growth in sustainable locations, and provide much-needed new homes.

***Test 3: (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt***

The Sustainability Appraisal (SA) (2018) prepared for the previous Local Plan sets out a number of sustainability issues facing the district. One of issues is the shortages in housing to meet need. It is clear that in consideration of Tests 1 and 2 that failing to meet the housing need will result in unsustainable development, as it would result in an even greater shortage of housing that would affect young families wanting to get on the housing ladder as well as affordable housing to meet the needs of lower income groups and other groups such as gypsies and travellers, the elderly and other groups wishing to build their own homes.

The SA 2018 document outlined that the number of new dwellings proposed will need to rely on development on greenfield Green Belt sites, which would bring with them landscape impacts. Effects on local landscapes and townscapes will be site dependent. Whilst greenfield sites will be required to deliver the number of new dwellings, the effects against the biodiversity objective are uncertain as they will be dependent on the specific sites taken forward for development. Similarly, housing development could have adverse effects on known or undiscovered heritage assets and again effects will be dependent on the specific sites taken forward for development.

Therefore, sustainability must also be considered at the site level to ensure that where it is necessary to impinge on the Green Belt, that the resulting development will still be capable of being considered as sustainable, compared to reasonable alternatives.

The SA also states that the scale of development that would be required to deliver the growth could however provide some potential benefits in relation to some of the environmental objectives. For example through the new housing development there will be some opportunities to improve local green infrastructure to the benefit of biodiversity, and the scale of development required to meet this level of new housing provision would enable opportunities for installing Combined Heat and Power systems that would benefit the 'greenhouse gas emissions' objective.

In terms of the economic objectives positive effects have been identified for the 'sustainable prosperity & growth' and 'fairer access to jobs & services' objectives as providing new homes will support the economy by providing necessary dwellings for local workers and create jobs in construction and the level of housing growth proposed should help to enable people to remain living in the area and therefore have improved access to newly created employment opportunities. Positive effects have also been identified for the 'revitalise town

centres' objective as the level of growth will help to support the viability of local centres and town centres.



It is clear that without impinging on the Green Belt, the identified housing needs may not be met, and any new development that results through planning applications on unallocated sites, rather than sites allocated in the Local Plan, is likely to result in uncoordinated development that fails to link new housing development with appropriate new supporting infrastructure.

Overall, development which includes land within the current extent of the Green Belt has been assessed in terms of sustainability through the Sustainability Appraisal process, and has been determined to represent a more sustainable level of development. This test can therefore be considered to be met.

It should be noted that one of the objectives of the draft Scoping SA 2021 is to provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations. It outlines similarly to the 2018 SA that while some new housing will inevitably continue to come forward from brownfield land and from other reforms to permitted development rights introduced in recent years, the Council is highly likely to have to consider releases of Green Belt land if it cannot find a neighbouring authority to cooperate and take some of the district's requirements.

As referred to above, the development of land at Townsend Lane would conform to the strategic aim for growth in sustainable locations, and provide much-needed new homes.

***Test 4: the nature and extent of the harm to this [part of the] Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and***

As part of SADC's previous (now withdrawn) Local Plan process, a Green Belt Review was undertaken. Whilst it is acknowledged that a new Green Belt Review will be undertaken in 2021, it remains relevant to comment upon the previous evidence base until a new document(s) is prepared in the context of Land at Townsend Lane.

The Green Belt Review Purposes Assessment for Dacorum, St Albans and Welwyn Hatfield (2013) assesses parcels of land using the five green belt purposes in order to assess their suitability for development and it outlines that the degree to which different parts of the Green Belt contribute to its overall success varies across the study area. The assessment identifies both larger (strategic sub-areas) and smaller scale areas of land where a reduction in the size of the strategic parcels within which they lie would not significantly compromise the overall functions of the Green Belt.

The assessment indicates that some boundary adjustments could be made without compromising the achievement of the overall purposes of the Green Belt. Potential adjustments could clarify the Green Belt's boundaries and reassert its significance as a key policy tool. Consequently, it is considered that harm to the nature and extent of the Green Belt can be limited through the careful selection of appropriate housing sites and necessary mitigation measures.

Table 1 of the Call for Site Submission (2021) carries out a site specific full assessment of Green Belt impact applying the method of the SKM Green Belt Review: Purposes Assessment, Nov 2013. With regard to the land at Townsend Lane, Harpenden, the site lies within parcel GB20 (Figure 9). The review identifies that parcel GB20 provides an important gap between settlements. However, parcel GB20 is an extensive area covering 1,150ha to the west of Harpenden and the general conclusions reached regarding the importance of this

parcel to the purposes of the wider green belt are not applicable to every site within the parcel. A much finer-grained assessment is required with respect to particular sites. Land at Townsend Lane is 1.65ha, approximately 1/700<sup>th</sup> of parcel GB20 and if assessed on its merits and contribution, will result in a conclusion that the site could be released without significant harm to green belt purposes.



Following the landscape and visual analysis it is concluded that the site in question does not contribute towards the wider green belt purposes of parcel GB20.

Figures 7 and 8 illustrate pictorially the points made in table 1 with respect to the site. They demonstrate that:

- Placing new homes on this site will not result in a reduction in the distance between Harpenden and Redbourn, or between Harpenden and any other 1<sup>st</sup>, 2<sup>nd</sup> or 3<sup>rd</sup> tier settlement. The outer edge of the current built-up area of Harpenden in the immediate vicinity of the site is aligned with the south western edge of the site
- There are clear defensible boundaries to the edges of the site, which would form the Green Belt boundary in this location, contiguous with the urban edge to the east
- The site is well contained with very limited views from the countryside, due to its topography and landscape features
- The site is surrounded by urban development to the south and east
- The historic core of Harpenden and its conservation area are not visible from the site or countryside in this location. New homes will be of high quality design and complement the existing character of the area.

Table 1 concludes overall that the site's release would cause limited or no harm to the purposes of the Green Belt.

The enclosed documents constitute a fine grain review of the land at Townsend Lane, Harpenden. They demonstrate that the openness and purposes of the Green Belt will not be harmed as a result of developing the site, and highlights the multiple benefits that would arise from a residential development. Therefore, given that the exceptional circumstances exist to release land from the Green Belt, the land at Townsend Lane should be released as only limited or no harm would arise to Green Belt purposes and the land does not need to be kept permanently open.

In the event that the Council considers that the land at Townsend Lane, Harpenden does perform an important Green Belt function, the site's location and sustainability advantages make it a more desirable location for release than other sites.

***Test 5: the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent***

As with Test 4 and Test 3, the extent to which harm to the Green Belt can be ameliorated or reduced will need to be considered on a site by site basis. However, there are some overarching measures that can be taken to ensure that harm to Green Belt is minimised through the overarching plan-making process.

Consideration can also be given to the densities achieved on any land that the Council does consider releasing from the Green Belt, as higher densities will require the release of less land from the Green Belt to deliver the same number of homes. Densities will however need

to be considered on a site by site basis, as there will be some locations where higher densities will increase harm to the Green Belt by emphasising more of the visual prominence of development on its edge, rather than reducing harm by blending in.



In addition to the Townsend Lane document (Appendix 1), supporting information enclosed includes a conceptual site layout. This demonstrates that the site can accommodate an appropriate form and layout for development, with a balance between built form and soft landscaping features. The concept seeks to maximise the opportunity and represent an efficient use of land, and remain in keeping with the local residential character of the area.

Consideration can also be given to the creation of new public open spaces at the edge of developments, or between developments, to maintain a sense of containment/ separation and bring land which may be at risk of future encroachment into a practical use that benefits existing and new local residents. This not only mitigates the effects of harm of the Green Belt, but also responds positively to the NPPF which promotes the positive use of land in the Green Belt for recreation and nature conservation purposes.

It is also likely that on a site by site basis, the design and layout of development and the use of landscaping will play an important role in mitigating harm to the Green Belt. Design and layout can ensure that development integrates into both the nearby urban area, and also the rural environment it would form the new boundary to, and particularly ensure that visually prominent parts of the site are either avoided, or else developed in a more sensitive way. Landscaping meanwhile can screen development in both nearby and long-distance views. High quality design which is based on a context appraisal, and includes consideration of landscaping requirements is therefore essential to minimising harm arising from development on sites within the current extent of the Green Belt, and should therefore form a consideration in relation to Test 5 also.

With regards to the site at Townsend Lane, there is either limited or no harm on the open character and objectives of the Green Belt. Notwithstanding this, the concept and indicative site layouts part of this Call for Sites Submission (2021) demonstrate that around 50 homes could be sensitively accommodated through high quality design, appropriate landscaping and open space. The site context and proposals are able to therefore help ameliorate any impact on the Green Belt.

The proposals will retain the key vegetation structure on the site, which will be supplemented by additional planting and the site layout and design will also be sympathetic to and in-keeping with the surrounding context. The site is adjacent to residential development borders to the east and south, ensuring it relates well to the existing urban area. The low-key settlement edge will also be maintained. Further to this, the development of the site would present the opportunity for a 'strong green edge' to the western side of the site, adjoining the open countryside, which would strengthen the boundary between the settlement and the Green Belt.

It is clear that in relation to development needs for housing development the circumstances certainly exist for determining that there are exceptional circumstances justifying the release of the land from the current extent of the Green Belt for development purposes. There is clearly an acute need for development, which is affected by inherent constraints on land supply. This in turn is affecting the ability of the Council to achieve more sustainable patterns of development that support economic growth and social outcomes. There will however be harm to the Green Belt arising from achieving this development, however there are opportunities to minimise this harm through careful site selection and mitigation including the

use of appropriate development densities, the provision of open space at the edge of development, and through high quality design and landscaping.



It is considered that it is possible to pass the tests set out in Calverton Parish Council v Greater Nottingham Councils [2015] within SADC to provide land to deliver the levels of development that meet assessed development needs. Further it is clear that exceptional circumstances exist to remove land at Townsend Lane from the Green Belt for high quality residential development.

It will be necessary for the Council to consider the detailed elements of Tests 3 to 5 as part of the new Green Belt Review being undertaken in order to ensure that a) the most sustainable development locations are identified; b) the extent and nature of harm to the Green Belt is considered; and c) harm to the Green Belt is ameliorated or reduced on development sites.

It is considered that the importance of the housing pressures and need, the sustainability of the location, coupled with the very limited role the site performs in terms of green belt function, and the ability to mitigate any Green Belt harm, clearly and demonstrably represent 'exceptional circumstances' needed to justify the release of the site from the Green Belt.

#### Supporting the science-based economy

Hill considers that, in addition to the reasons above, there is an additional 'exceptional circumstances' reason based on the particular circumstances of the Trust and Rothamsted. The release of land at Townsend Lane forms part of an overarching strategy of the Trust to make efficient and effective use of its landholdings to provide on-going investment at Rothamsted. Development would also provide new homes (both market and affordable) in close proximity to one of the District's major employment locations and world leading agricultural science centre.

Developing the site at Townsend Lane provides an opportunity to support the ongoing work of the Trust and Rothamsted Research, supporting the Hertfordshire LEPs number 1 priority of maintaining global excellence in science and technology.