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DSD/lja/026-08

4th March 2021



TOWN PLANNING * DEVELOPMENT * ENVIRONMENTAL CONSULTANTS

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Dear Sirs

St Albans City and District Council
Strategic Housing Land Availability Assessment Update 2021 – ‘Call for Sites’

We have been instructed by London & Cambridge Properties Limited (LCP) who own land to the east of Redbourn (Old Station Yard) and to the west of the A5138 (see attached plan), to submit representations in respect of the above document. The site is well known to the District Council and LCP have been in discussions with the Parish Council and other landowners to discuss how a comprehensive redevelopment of the site is deliverable and would assist in meeting some of the housing requirements in the area. Furthermore, the site could come forward separately.

The site has previously been submitted as part of the 2009 SHLAA (Site Reference. SHLAA-GB-R-18) and reaffirmed in the 2016 Call for Sites. It has also been included as a potential allocation in the emerging Redbourn Neighbourhood Plan albeit we understand that the latest version of the NP will not allocate sites for housing. Therefore, as outlined on the Council's website, there is no need to resubmit this site as part of the 2021 'Call for Sites' as it will automatically form part of the SHLAA update.

However, the purpose of this letter is to confirm that the site is still available for residential development. Under our representations to the Redbourn NP, it was recommended that the site should be released from the Green Belt and allocated for housing. We understand that the amended NP will not now allocate residential sites due to the Council withdrawing their emerging Local Plan. We would trust that in the new emerging Local Plan that the Council seek to allocate such sites for residential development.

If you require any additional information then do not hesitate to contact us.

Yours faithfully

D2 Planning Limited

D2 Planning Limited

Registered Office: 2 Chesterfield Buildings, Westbourne Place, Clifton, Bristol BS8 1RU Registered in England: 5309357

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

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

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

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

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

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

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

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

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

Please do not submit sites that:

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

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

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

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

By online consultation portal:

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

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

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

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

Your Details	
Name	Jonathan Bainbridge
Company/Organisation	Bidwells LLP
Address	25 Old Burlington Street, London
Postcode	W1S 3AN
Telephone	
Email	
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details			
Requirements:			
<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 			
Site address/location (Please provide a map showing the site boundary)	"Land North East of Redbourn" North East of Redbourn, West of A5184		
Site area (in hectares)	46		
Coordinates	Easting	510764	Northing 212846
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 research		
Condition of current use (e.g. vacant, derelict)	Greenfield		
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input checked="" type="checkbox"/> Mixed Use (please specify) <input checked="" type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify) <i>[Residential led mixed-use including small scale employment, local services, education and retirement/ care.]</i>		

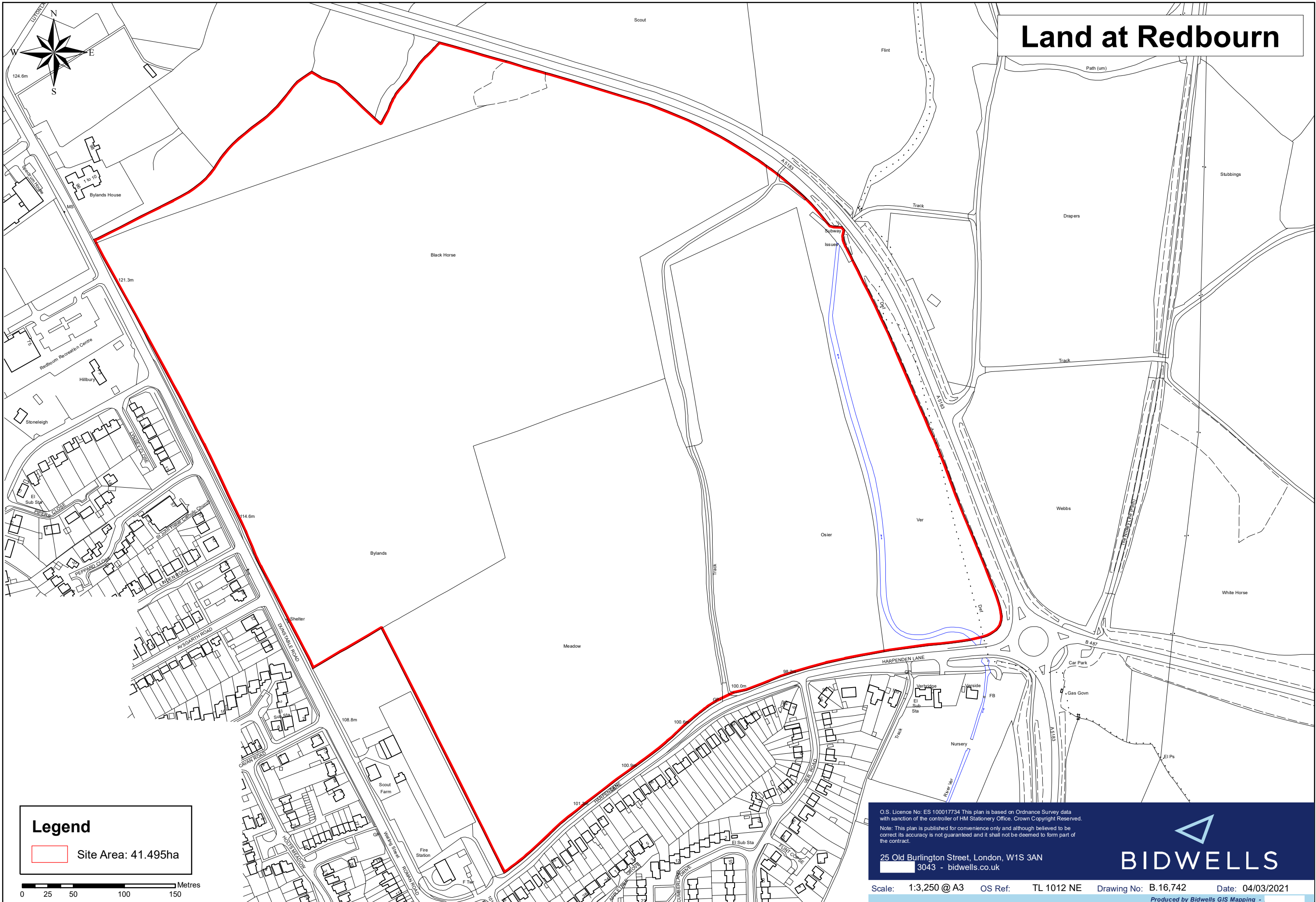
Reasons for suggested development / land use	<i>[See attached statement. Site does not perform against Green Belt purposes and is available for development. It is a sustainable location and will provide benefits for Redbourn village. It will contribute to much needed housing within the district with a capacity of some 825 new homes. It will deliver affordable homes, starter units, key-worker units and opportunities for self build. There will be a biodiversity net gain and the masterplan will respond to the challenges of the Climate Emergency.]</i>
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input checked="" 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 checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No [Mostly in Zone 1, constraint can be addressed through masterplan]
	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 [Utilities run adjacent to site]
	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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this

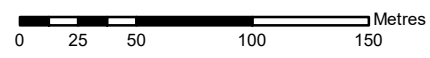
	the need to cross land in a different ownership to the site?	information the site will not be considered to be deliverable).
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	Other constraints affecting the site	<input checked="" type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No Adjacent to the Redbourn Conservation Area Adjacent to the Grade II Listed Barn at Scout Farm
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input checked="" type="checkbox"/> Pre-Application Advice <input checked="" type="checkbox"/> Planning Permission Not Sought <input checked="" type="checkbox"/> Other Please include details of the above choice below: Please include details of the above choice below (for example planning reference numbers and site history) <i>The Trust engaged at all stages of the withdrawn Local Plan as set out within the supporting statement. The Trust has also sought to engage with the Council to discuss the site's redevelopment. Pre-application advice was received February 2020 (PRE/2019/0016) and an EIA Scoping Opinion adopted December 2019 (5/19/2803).</i>	
Other comments	<i>The site presents an opportunity to provide desperately needed housing in a sustainable location. The site is immediately adjacent to the existing settlement boundary of Redbourn and benefits from clear containment within the Redbourn bypass. The Trust is currently in the process of appointing a development partner to bring the site forward as a joint venture. This will provide greater certainty of the site's deliverability. Please see the enclosed supporting 'Call for Sites Vision Statement' for further information.</i>	

Land at Redbourn



Legend
Site Area: 41.495ha



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Produced by Bidwells GIS Mapping

Your ref:
Our ref: JB62840
DD:
E:
Date: 08/03/2021

Spatial Planning Team
St Albans City and District Council

Sent via email:

Planning Policy (SADC): Planning.Policy@stalbans.gov.uk

Dear Mr Briggs and Ms Morphet,

**LAWES AGRICULTURAL TRUST – SUBMISSION OF SITES TO YOUR CALL FOR SITES
CONSULTATION AND ONWARD PROGRAMME OF WORK.**

Thank you very much for inviting the Lawes Agricultural Trust to take part in your recent webinar in relation to work that you're undertaking relating to the creation of a new Local Plan.

You may already be aware that Bidwells is advising the Trust on its strategic vision for the future of its landholdings in the district, and we previously supported its representations to the withdrawn Local Plan during Regulation 19 and Examination stages.

The Trust is a charity that was established in 1889 by Sir John Bennet Lawes FRS, who had earlier founded Rothamsted Experimental Station in 1843. It provides the land and buildings for the agricultural research and related sciences conducted by Rothamsted Research. It therefore plays an active role in promoting collaboration and innovation with commercial agricultural technology businesses, in conjunction with Rothamsted Enterprises Limited (REL). This is recognised by its representation on the Hertfordshire Local Enterprise Zone (HertsIQ) Partnership Board.

Through its financial support, the Trust contributes towards the employment of over 400 people within the district, comparable with the largest employers in the area. It also provides accommodation for ca.200 key workers, students, and staff – enabling them to move into the area on modest scientific salaries. As a local charity and landowner, they are committed to reinvesting every penny generated in agricultural science.

Supporting this mission, the Trust wishes to submit two sites to your current call for sites. The first is in relation to land North East of Redbourn, and the second in relation to its landholdings at the Rothamsted Innovation Campus. Both submissions will support significant inward investment into the district.

North East Redbourn

You will be aware of the Trust's aspiration to provide housing at its landholdings to the North East of Redbourn. The site was noted as an 'amber' site within the withdrawn Local Plan and allocated reference 'R-551. Extending to 42.1ha in total, there is a substantial opportunity to provide a highly sustainable and well considered residential led development at the site. Indeed, during the examination process it was identified as being potentially part of the solution to the boroughs housing need, in light of Park Street Garden Village being found 'undeliverable'. In addition, we consider that there would be multiple benefits for the community of Redbourn and for the district of St. Albans.

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As a charity, the Trust does not face the same pressures as commercial developers to satisfy shareholders or investors and they can be confident in committing to affordable housing, in accordance with development plan requirements. We also wish to deliver a proposal which responds to the climate emergency head on.

Finally, it is important to raise that the Trust has embarked upon a process to identify a suitable development partner that shares both its values and its aspirations for the district. The decision to ask for support has been taken by the trustees after a lot of careful thought and consideration. We consider this will add to our case that this site can come forward rapidly in light of current housing requirements and serves to enhance deliverability.

The Trust strongly believes that the development of Land North East of Redbourn can deliver the Council's Local Plan priorities, and we would very much welcome the opportunity to discuss this with you.

Rothamsted Innovation Campus.

Underpinning the Trust's vision to develop North East Redbourn is an estate strategy which seeks to provide an ambitious, long term plan for the wider estate to help advance research and innovation, support Rothamsted Research's science strategy, enable growth of agritech enterprises, and meet the research, charitable and financial objectives of the Trust and its partners.

Whilst the Harpenden campus plays a vital role in supporting world-leading agricultural science and research, there are significant pressures on the Trust to reshape the estate to support new areas of focus and cutting-edge methodologies in the short, medium and longer term. Consequently, the Trust is preparing a 2040 Innovation Campus Vision for Harpenden which will underpin development across its site and provide a strategic framework to meet the envisaged policy requirements for transformation of the Estate in an emerging development plan document.

The Vision is ambitious and can deliver significant economic and social benefits at a local, national and international level. The activities at Harpenden already contribute an estimated £3bn to the UK and international economies, and the research activity and high value creation would be sustained and enhanced through the life of the Vision.

The new innovation activities envisaged by the Trust will boost the economic activity. One scenario, for example, sees the potential to deliver an additional 2,000 jobs over the period of the Vision, and leverage significant inward investment into the campus. However, this vision is not solely for the benefit of the Trust. With a carefully considered approach, the Harpenden Innovation Campus Vision could deliver a series of further social and community benefits including:

- Community use of conference facilities and estate, and access for local people to public spaces in buildings and restaurant /amenities and potentially new visitor/education facilities
- Reducing its carbon impact, promoting sustainable access and offsetting other development impact within the borough
- Improved landscaping, green spaces, pedestrian routes and access to and through the campus increasing its ecological performance and mitigating its visual impact
- Improved social and welfare facilities for campus occupiers and visitors

The Trust is at an early stage in the development of this vision and it is considered vital that it dovetails with the emerging planning policy context. For these reasons, we will seek to make further representations to the emerging policy position at the appropriate time, however it is considered that commencing engagement at this early stage is appropriate and that its contribution to future employment requirements should be given serious consideration.

We appreciate that the path towards an up-to-date local plan is not an easy one, with the Council facing pressure from central government, housebuilders, and local communities, and the Trust is keen to support the District Council in this process. Whilst the development of the revised Local Plan is at an early stage, we and the Trust would welcome the opportunity to meet with you in order to discuss how we can work together to assist you in meeting the challenges facing the district.

We look forward to working in partnership with you.

Yours sincerely,

Jonathan Bainbridge

Partner, Planning

Enclosures **Call for Sites Form & Plan, RoCRE**
Call for Sites Form & Plan, Redbourn
Call for Sites Vision Statement, Redbourn

Copies **Peter Oxley, Lawes Agricultural Trust**
Nick Vose, Marengo Communications

**LAND NORTH EAST OF
REDBOURN
CALL FOR SITES
VISION STATEMENT**

Table of Contents

1.0	Introduction	1
2.0	Site context: A Sustainable Location	2
3.0	Responding to Climate Emergency	3
4.0	Site Analysis: The Site	3
5.0	Emerging Proposal	4
6.0	Summary	6

Appendix 1

CALL FOR SITES FORM

Appendix 2

GREEN BELT ASSESSMENT

Appendix 3

JOINT INSPECTOR'S STATEMENTS

Appendix 4

LOCATION PLAN

1.0 Introduction

- 1.1 In response to your formal Call for Sites request, we are pleased to submit, on behalf of our client, the Lawes Agricultural Trust (“the Trust”), the site known as ‘Land North East of Redbourn’ (“the site”).
- 1.2 This submission relates to that made as part of the January 2018 Call for Sites exercise as R-551 ‘(North East of Redbourn, West of A5184)’. The outcome of which was the site being listed as an ‘amber’ or reserve site. Representations were subsequently made at Regulation 18 and 19 stages of the St Albans City & District Local Plan 2020-2036 consultation and at the Examination in Public, arguing that the site was available and deliverable and that it could make an important contribution to the significant housing need within the district.
- 1.3 This submission builds upon the evidence as previously submitted.
- 1.4 We continue to consider that Land North East of Redbourn presents a significant opportunity to provide a sustainable residential led mixed-use masterplan. This masterplan will provide for the right type of housing in response to the district’s needs. It will include affordable and key worker accommodation, alongside potential for retirement and care. In addition, the site could provide for small scale local employment and community facilities supporting the existing high street at Redbourn. It will enhance the sustainability of the settlement. Evidence has previously been provided setting out that the site is available and deliverable, and this remains the case. We consider that there are exceptional circumstances which justify the site’s release from Green Belt and this case will be set out through future representations.
- 1.5 The Council will be aware that the Trust has sought early pre-application advice and has also implemented a comprehensive communications plan for engagement with the local community, including two public exhibitions (November 2018 and July 2019) and engagement with parish and district councillors.
- 1.6 Since then, St Albans and City District Council’s (SACDC) draft Local Plan has been withdrawn and key evidence is being reconsidered. Significantly in respect of North East Redbourn, the Joint Inspectors flagged several concerns with the methodology used to discount sites (including this site) in the previous process. This resulted in the omission of sites considered to result in a lesser impact on the purposes of the Green Belt than those which were taken forward as strategic sites / broad locations. In this respect, we would note that when considered at a more appropriate scale than was used under the previous assessment, North East Redbourn performs poorly in respect of the purposes of the Green Belt. We have enclosed an independent assessment to assist in future evidence base work.
- 1.7 For ease of reference, the following documents have been enclosed alongside this submission:
- Site Nomination Form
 - Site Location Plan (Submission site outlined in red and wider ownership in blue)
 - Green Belt Review – Arrow Planning (October 2018)
 - Green Belt Review – Nicholas Pearson Associates (October 2018)

2.0 Site context: A Sustainable Location

- 2.1 North East of Redbourn is a 46 hectare site, immediately adjacent to the existing settlement boundary of the village of Redbourn. Redbourn offers a range of local amenities including a food store, pharmacy, cafes, restaurants and public houses, a library and schools.
- 2.2 In terms of the site's connectivity, it lies between Dunstable Road (Watling Street), Harpenden Road and the Redbourn bypass (A5183). In spatial terms, these containing roads illustrate clearly that the site is a 'missing quadrant' of development at Redbourn. The bypass also serves as a very clear and distinguishable defensible boundary.
- 2.3 Prior to the opening of the Redbourn bypass in 1984, Dunstable Road was the only north-south link to, and through, Redbourn and was known as the A5. Dunstable Road is, however, now a no-through road for all traffic, except for buses.
- 2.4 The A5183 continues north to Junction 9 of the M1 and then on to Dunstable, and south to St Albans. The B487 runs east from the Redbourn bypass to Harpenden, and west from the A5183 to Hemel Hempstead.
- 2.5 Five bus routes serve Redbourn calling at stops on Dunstable Road to the west of the Site, or on Harpenden Lane on the Site's southern boundary. There are relatively good service levels to St Albans, Dunstable, Markyate, Hemel Hempstead and Luton with 1 to 3 services per hour. Although Harpenden is the nearest large town to Redbourn, the level of bus services between the two settlements is limited.
- 2.6 Rail services are available from Harpenden and St Albans City stations which can be reached by a number of bus routes from the area around the Site.
- 2.7 In terms of public rights of way, a footpath (Route 49) runs along the eastern boundary of the area proposed for residential development. A further footpath (Route 41) can be accessed to the north of the site. No formal pedestrian crossing facilities are currently provided where these routes cross the A5183 Redbourn bypass. We expect this to be addressed through the site's development. The routes provide onward connections to Flamstead and Harpenden, while other local public rights of way lead south towards St Albans.
- 2.8 In addition to these public rights of way, there are several long-distance walks that pass close to the Application Site, including the Nickey Line, Hertfordshire Way and Chiltern Way.
- 2.9 Footways adjacent to local roads in proximity to the Site, are provided on Harpenden Lane and Dunstable Road and local cycle routes include the Nickey Line, the Chiltern Cycleway, Dacorum Circular Ride and National Route 6.
- 2.10 Because of this, it is considered to be in a sustainable location and will serve to maintain the village's vibrancy.

3.0 Responding to Climate Emergency

- 3.1 In July 2019 SACDC formally declared a climate emergency and subsequently published the Sustainability and Climate Crisis Strategy (2020). This document outlined the approach the Council would take to tackle the climate crisis and create a more sustainable district.
- 3.2 Through its charitable purposes and as a founding member of the Environment Change Network, the Trust is actively involved in responding to the challenges of the climate emergency. On a day to day basis, this is delivered through its scientific research into sustainable agriculture and future farming, as well as its innovation and entrepreneurship accelerator (AgRIA).
- 3.3 It is in this context, that the Trust welcomes putting climate change at the heart of future planning policy. It aspires to respond directly, by developing proposals that adopt and exceed best practice to reduce carbon emissions arising from the proposals. The Trust also commits to providing a development which is resilient to climate change and which provides a net gain in biodiversity.
- 3.4 Further details of how the Trust plans to incorporate sustainability strategies into the masterplan are included in the sections below and will be developed further as the emerging plan progresses.

4.0 Site Analysis: The Site

- 4.1 The site is currently in arable agricultural use as part of Rothamsted Research. However, the use is associated with Rothamsted's research programme and is not a traditional arable function.
- 4.2 The site is immediately bound by Dunstable Road (part of the former Roman Road known as Watling Street) to the west, Harpenden Road to the south and the Redbourn bypass (A5183) to the east. A former garden nursery is located to the west of the site, adjacent to Dunstable Road. The former garden nursery site includes a Grade II listed barn and locally listed farmhouse known as Scout Farm.
- 4.3 The Grade II building has been subject to fire and is in a very poor state of repair. Part of the former garden nursery has planning permission for the "*Restoration and conversion of existing barns to provide one, four bedroom and one, three bedroom dwelling, and construction of three terraced houses comprising one, three bedroom and two, four bedroom dwellings with associated car parking and landscaping*" (Application reference 5/18/1334).
- 4.4 The nearest residential properties are located on the opposite side of Dunstable Road and Harpenden Lane and a fire station is located adjacent to the junction. This is also the location of a new county library facility.
- 4.5 The site lies mostly within Flood Zone 1 with the River Ver traversing the eastern part. It should be noted that the river's flow is minimal and in recent years has been mostly dry.
- 4.6 The site lies outside but immediately adjacent to the Redbourn Conservation Area, some 1km southwest of the Rothamsted Romano-British cemetery Scheduled Monument, some 1.5km

northeast of The Aubreys Camp Scheduled Monument, and 2.3km east of the Chilterns Area of Outstanding Natural Beauty.

- 4.7 The site is designated as the Metropolitan Green Belt and as such, a Green Belt Review was commissioned by the Trust in 2018. A separate evaluation of urban sprawl and safeguarding of the countryside from encroachment has also been carried out by NPA and is also appended to this submission.
- 4.8 Whilst the Arrow review (2018) provides a focussed assessment against 12 Green Belt sites identified following the previous Call for Sites and Local Plan Strategic Site Evaluation, it remains valid in its conclusions in so far as the site is concerned. It provides a focussed assessment for each site (including North East of Redbourn) against four of the five purposes of the Green Belt and concludes that the Site makes little or no contribution to the four purposes and should therefore be considered for Green Belt release.

5.0 Emerging Proposal

Emerging Development Vision and Principles

- 5.1 Whilst plans are not yet fixed, significant master planning work has already been carried out on the site. Of the 46 hectares, it is considered that approximately 24.5 hectares of it is available for residential development. This could provide for up to 825 new homes. The masterplan, whilst indicative at this stage, also suggests that there is eight hectares to provide for the necessary educational use and 12.3 hectares as meadow / woodland to be made accessible to the local community. The remaining land would be used for small scale employment and community facilities.
- 5.2 The masterplan will be developed around the core themes of: Residents and community; Wellbeing; Nature and landscape; Building Better Building Beautiful; and A Legacy for the Trust.

Residents and community

- 5.3 The Trust understands that home ownership continues to be out of reach for many in the housing market, despite government interventions such as 'Help to Buy' and investment into shared ownership.
- 5.4 While the precise mix of residential accommodation has not yet been defined, as a long-standing member of the local community, the Trust aspires to meeting the policy objectives in terms of affordable housing.
- 5.5 In order to tailor the housing provision to the local needs, it is also expected that the development will provide for an appropriate quantum of key worker housing; starter homes for those getting on to the housing ladder; retirement living (and care) to free up other housing stock; and self-build opportunities to increase the diversity of design across the site.

- 5.6 Based on detailed socio-economic work which we have carried out and also from feedback received during our community engagement, the site represents a fantastic opportunity to meet the needs of the wider community.

Wellbeing

- 5.7 It is increasingly recognised that the places in which we live, work and play have a significant impact upon wellbeing and mental health. Creating well designed places can therefore bring huge benefits in lifestyle and wellbeing. The Trust is committed to integrating best practice to ensure that North East Redbourn provides a place that promotes wellbeing, fosters community spirit and enables independence.
- 5.8 This will include proving a street hierarchy which produces connected places of interest and which promotes walking and cycling. Providing sustainable access to the amenities which Redbourn High Street has to offer, nearby primary and secondary schools, and other community facilities will reduce reliance on the car and support health lifestyles. Leading towards public spaces and community centres, the public realm will be of a high quality supporting a great range of biodiversity and ecology.

Nature and Landscape

- 5.9 The development of North East Redbourn provides a significant opportunity to deliver biodiversity net gain to capture carbon and to improve access to open space for the general public.
- 5.10 The River Ver Countryside Park, which is planned to be returned to wild meadows and wetland, will cover just under half of the site providing a space for recreation, education and ecological enhancement. It will also act as a functional part of the masterplan's SuDS drainage strategy.

Build Better, Build Beautiful

- 5.11 On 30 January, the Ministry for Communities and Local Government (MCLG) published a suite of documents in response to the Building Better, Building Beautiful, Commission Report and it has recently set out that good design should play a greater role within the planning process.
- 5.12 The Trust is aware of the importance of effective placemaking and the importance of area-based master planning in assessing and meeting the need to optimise, whilst also creating beautiful places.
- 5.13 North East Redbourn has the potential to produce a considered mixed use development, creating streets, squares and blocks with clear backs and fronts. The development will reflect local identity with building styles and street patterns promoting an organic extension of the village, with an appropriate scale and density.
- 5.14 As explained above, nature will also be an integral part of the design, resulting in a development which forms part of the wider ecology. Green spaces, waterways and wildlife habitats will be integral to the urban fabric and designed to be clear and legible; either enclosed, safely private or clearly public.

- 5.15 Building Better and Building Beautiful will be a key component of North East Redbourn moving forward.

A Legacy for the Trust

- 5.16 The Lawes Agricultural Trust's objective is: *"to advance the science of agriculture for the public benefit through original investigation and research, which may embrace all or any subject(s) connected to or bearing upon agriculture, including animal or vegetable physiology, meteorology, botany and chemistry."* It has been delivering on this objective since 1889 and is a long-standing member of the community.
- 5.17 The Trust's principal asset is the Rothamsted Estate, Harpenden and it will always remain so. The community can therefore be reassured that the Trust wants to be part of a sustainable future that keeps the area attractive to young people seeking high quality jobs and to local people who want to strengthen their community close to home. 100% of the income generated by the Trust from the Land North East of Redbourn proposal will be re-invested in the area through its continued financial support for agricultural science.

6.0 Summary

- 6.1 The vision for Land North East of Redbourn is to capitalise on a genuine opportunity to contribute quickly towards the housing need of the district in a highly sustainable location and in a manner which gives back to the local community.
- 6.2 It provides for a range of affordable homes and increases the vitality of Redbourn with new local facilities. It also presents an opportunity to invest in new local infrastructure and community services benefitting existing residents.
- 6.3 The proposals will respond to the climate emergency head on, and will place the contribution that good design can bring to the health and wellbeing of residents at the heart of emerging proposals.
- 6.4 It is recognised that to facilitate this vision, the site will need to be released from the Green Belt. There are exceptional circumstances to justify this and the site itself is considered to perform poorly when assessed against the core purposes of the Green Belt set out within the NPPF and as a result of clear defensible boundaries, the site's release will not lead to a long standing impact on Green Belt elsewhere
- 6.5 The proposals are underpinned by extensive consultation and this will continue as plans progress. Extensive technical work has been undertaken to ensure deliverability can be achieved and this will also be developed moving forward. The vision for North East Redbourn is consistent with the emerging vision and objectives of the new Local Plan and the Trust looks forward to engaging further with the Council as the Plan progresses.

APPENDIX 1

CALL FOR SITES FORM

APPENDIX 2 GREEN BELT ASSESSMENT

APPENDIX 3

JOINT INSPECTOR'S STATEMENTS

APPENDIX 4 LOCATION PLAN



BIDWELLS

Green Belt Review

St Albans City and District Council

Prepared on Behalf of The Lawes Agricultural Trust

October 2018



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Table of Contents

1.0	Introduction	1
2.0	Policy and Guidance	2
	National Planning Policy Framework	2
	Other Policy and Guidance	2
	Green Belt Review Purposes Assessment (Part 1) (November 2013)	3
	Green Belt Review Sites & Boundaries Study (Part 2) (February 2014)	3
	Local Plan Inspector Reports	3
3.0	Methodology	5
	Identification of Sites	5
	Review of Proposed Site Boundaries	5
	Site Visit	6
	Assessment of Each Site	6
	Purpose a): To Check the Unrestricted Sprawl of Large Built-Up Areas & Purpose	
	c): To Assist in Safeguarding the Countryside from Encroachment	7
	Purpose b): To Prevent Neighbouring Towns Merging into One Another	7
	Purpose d): To Preserve the Setting and Special Character of Historic Towns	8
	Final Recommendations	8
4.0	Assessment of Sites	9
	Site R-551 Land north east of Redbourn	9
	OS-400c East Hemel Hempstead (South)	10
	OS-400d South East Hemel Hempstead	10
	OS-400a East Hemel Hempstead (North)	10
	OS-602 North Hemel Hempstead	11
	H-595 North West Harpenden	12
	H-583 North East Harpenden	12
	SA-605 North St Albans	13
	Site SM-626 Oaklands College, Smallford (East St Albans)	13
	Site LC-621 Land West of London Colney	14
	PS-607 Former Radlett Aerodrome	15
	Site CG-561 Chiswell Green	16
	Summary of Scoring	17
5.0	Recommendations	18

Appendix 1: St Albans City and District Local Plan Strategic Site Evaluation
Appendix 2: Representative Site Photographs

1.0 Introduction

- 1.1 This Green Belt Review (GBR) has been prepared on behalf of the Lawes Agricultural Trust. It provides a detailed assessment of 12 Sites within St Albans City and District (SACD) and considers whether the land should be removed from the Green Belt.
- 1.2 This GBR is focused on 12 Green Belt Sites in the District which received either an ‘amber’ or ‘green’ rating in the Local Plan Strategic Site Evaluation, a copy of which is enclosed at Appendix 1¹. Not all of these Sites have been subject to a detailed Green Belt Review; some have only been considered as part of significantly larger parcels in the Stage 1 Assessment.
- 1.3 This document does not consider ‘exceptional circumstances’ for release from the Green Belt. Instead it provides a focused assessment of each Site against 4 of the 5 purposes of Green Belt (paragraph 134 of the National Planning Policy Framework July 2018), namely:
 - a) *to check the unrestricted sprawl of built up areas;*
 - b) *to prevent neighbouring towns from merging into one another;*
 - c) *to assist in safeguarding the countryside from encroachment;*
 - d) *to preserve the setting and character of historic towns;*
- 1.4 The fifth purpose, *to assist in urban regeneration by encouraging the recycling of derelict and urban land* is not assessed. This is because all Green Belt land will contribute to this purpose to the same extent.
- 1.5 This assessment forms one part of an evidence base that could be utilised to justify the release of Green Belt land. The suitability, sustainability and deliverability of each Site must be considered separately as part of a wider process.

¹ Report to St Albans City and District Council Planning Policy Committee dated 22 May 2018: Local Plan – Draft Strategic Site Selection Evaluation Outcomes

2.0 Policy and Guidance

National Planning Policy Framework

- 2.1 The revised National Planning Policy Framework (NPPF) was published in July 2018. The NPPF includes transitional arrangements for those Plans submitted before the 24th January 2019, allowing for them to be assessed against the 2012 NPPF. As SACD are proposing to submit the Local Plan after this date, the July 2018 NPPF is therefore the relevant national policy.
- 2.2 The five purposes of Green Belt (paragraph 134) are set out above. Para 133 identifies the fundamental aim of Green Belts, namely, to prevent urban sprawl by keeping land permanently open. The NPPF recognises that where exceptional circumstances are fully evidenced and justified, Green Belt boundaries can be altered.
- 2.3 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. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.*
- 2.4 Paragraph 139 provides the requirements for Local Plans in defining Green Belt boundaries:
- a) *“ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
 - b) *not include land which it is unnecessary to keep permanently open;*
 - c) *where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
 - d) *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
 - e) *be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
 - f) *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

Other Policy and Guidance

- 2.5 Despite the updates to the NPPF contained in the 2018 version of the document, there is currently no nationally accepted methodology for conducting Green Belt Reviews or Assessments.

- 2.6 The evidence base accompanying the consultation SACD Local Plan 2020-2036 Publication Draft (September 2018) includes a Green Belt Review.

Green Belt Review Purposes Assessment (Part 1) (November 2013)

- 2.7 The Part 1 Assessment was completed in November 2013. The main purpose of the Assessment was to undertake a strategic review of all Green Belt land across three planning authorities to identify the contribution of the Green Belt towards national Green Belt purposes as set out in the NPPF².

- 2.8 The Assessment was a strategic level study of Green Belt land, and in doing so only considered extensive parcels of land. It did not identify or consider individual sites.

Green Belt Review Sites & Boundaries Study (Part 2) (February 2014)

- 2.9 The Part 2 Assessment was completed in February 2014. The Assessment built upon the work established in Part 1. Part 2 sought to identify smaller sites within the extensive parcels identified by the Part 1 Assessment, for potential release from the Green Belt for future development.

- 2.10 The Part 2 Assessment, whilst labelled a Green Belt Review, assessed sites against matters outside of Green Belt purposes. In particular, the Part 2 Assessment considered environmental and sustainability matters. The methodology for the Part 2 Assessment was therefore flawed. The stated aim of the Part 2 Assessment was to rank the sites in terms of their suitability for Green Belt release³. However, the Assessment used non Green Belt purposes (e.g. constraints such as oil lines and environmental constraints) to rank the sites.

- 2.11 These matters may be considered in the round by a separate, and wider, planning assessment but are not Green Belt purposes and therefore should not be used as part of justification for ranking sites in Green Belt terms.

Local Plan Inspector Reports

- 2.12 This point is particularly evident in the Inspector's Report into the examination of the London Borough of Redbridge Local Plan (2015-2030) dated 24 January 2018.

- 2.13 In paragraph 66 of his report, the Inspector states that "*The methodology of the Review and Addendum properly focuses on the purposes in paragraph 80 of the [2012] NPPF*".

- 2.14 In an Inspector's Note (following a Stage 1 & 2 Hearing Session to the Welwyn Hatfield Local Plan Examination) (December 2017), similar findings of relevance are noted. In that report, the Inspector critiqued the Council's consideration of openness for incorporating an examination of landscape character.

² Para 1.3.3, p. 4 Green Belt Review Purposes Assessment (November 2013)

³ Bullet 3, para 1.1.4, p1. Green Belt Review Sites & Boundaries Study (February 2014)

- 2.15 The Inspector found that such a study “*should not be concerned about the character of the landscape*”.
- 2.16 Furthermore, the Welwyn Inspector also identifies an additional related matter in respect of the SACD Green Belt Review. The Inspector found that:
- “the phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas. It goes without saying that a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt. Such an approach is also more likely to reveal opportunities as well as localised constraints, both of which might reasonably be considered further.”*
- 2.17 In considering the Stage 2 Review the Inspector found that it had not examined all of the potential development sites adjacent to urban areas.
- 2.18 The SACD Green Belt Review Stage 2 similarly has not considered all potential development sites adjacent to urban areas. Instead it has solely focused on 8 Sites. This GBR therefore considers additional Sites which have been identified by the Council, as well as those 8 Sites.

3.0 Methodology

- 3.1 The methodology for this GBR comprised the following stages:
- a) Identification of sites to be subject to Green Belt Review;
 - b) Review of proposed site boundaries;
 - c) Site visit to each site;
 - d) Assessment of each site against the first 4 Green Belt purposes;
 - e) Final recommendations.
- 3.2 In the case of the assessment against Green Belt purposes, a separate evaluation of urban sprawl (purpose a)) and safeguarding of the countryside from encroachment (purpose c)) has been carried out by Nicholas Pearson Associates. More information on this is provided below.
- 3.3 The Council's Part 2 Assessment is considered flawed as it considers non-Green Belt matters yet assesses and ranks sites for the purposes of proposed Green Belt release. Having regard to the findings of the Inspectors Reports identified in Section 2 of this Assessment, this GBR is instead focused solely on Green Belt matters, and in particular 4 of the 5 purposes of the Green Belt.

Identification of Sites

- 3.4 The SACD Strategic Site Evaluation identified 12 Sites with either an amber or green rating. Of these 12 Sites, 8 were subject to the Part 2 Green Belt Assessment, the remaining 4 were not.
- 3.5 Notwithstanding the fact that 8 of the Sites are included in the Council's Part 2 Assessment, they are considered in full in this GBR. As identified above, the SADC Assessment is flawed and therefore those Sites are reassessed here alongside the 4 other Sites in order to provide a fair and even comparison of all Sites.

Review of Proposed Site Boundaries

- 3.6 The boundaries of each of the Sites included within the SACD Strategic Site Evaluation are clearly identified within that evaluation. However, those boundaries reflect the area of land promoted, rather than necessarily what would constitute an appropriate Green Belt boundary.
- 3.7 Paragraph 139 of the NPPF states that when defining Green Belt boundaries, Local Plans should, inter alia, "*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*"
- 3.8 Therefore, in assessing each Site, the boundary of each Site has been reviewed to consider whether it was consistent with paragraph 139 of the NPPF, or whether it could be amended for the purposes of this GBR, in order to identify a more "*readily recognisable*" potential Green Belt boundary.

Site Visit

- 3.9 The purpose of the site visit was to consider each Site in both its immediate and wider context. The site visits allowed for the topography of each Site and surround, site boundary features, and other buffers (both local and further afield) to be viewed and considered in the context of development on each Site.
- 3.10 Wider public viewpoints were identified in advance based upon OS data, focusing on Public Rights of Way (PROW) which could provide views of the Sites and (resultant) expanded settlements.
- 3.11 Each Site was visited on 3 September 2018. The visits were carried out on a clear sunny day with excellent visibility. All Sites were viewed locally from publicly accessible places, including public rights of way and local roads. All Sites were also viewed from more distant publicly accessible viewpoints.
- 3.12 Secondary visits were made to sites on 14th September to allow for further views of the Sites. Again, the conditions on that day were clear.

Assessment of Each Site

- 3.13 The Assessment of each Site was primarily based upon evidence obtained in site visits, with further evidence for the assessment sourced from desk-based information sources such as aerial photography (primarily Google Earth) and available historic mapping data.
- 3.14 As identified earlier in this statement, the purpose of this assessment is to consider how the sites perform against the 4 of the 5 Green Belt purposes, namely:
- 3.15 Each Site is assessed against the contribution it makes to 4 of the 5 purposes of the Green Belt⁴, namely:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns;
- 3.16 A set of scoring criteria was used for each purpose, with a score out of five given. The NPPF does not place any greater emphasis on one purpose over the other, so each purpose is considered equally significant.
- 3.17 This Scoring Criteria is consistent with that applied elsewhere in other Green Belt Reviews and is a commonly adopted methodology for scoring Green Belt Assessments.
- 3.18 Therefore, a planning judgement is required in order to determine whether an assessed Site is, overall, strongly or weakly meeting Green Belt purposes.
- 3.19 The scoring criteria used are as follows:

⁴ Paragraph 134, p. 40, National Planning Policy Framework, July 2018

Overall strength of Site against Green Belt Purpose	Score	
	0	Does not meet purpose
	1	Meets purpose very weakly
	2	Meets purpose relatively weakly
	3	Meets purpose
	4	Meets purpose relatively strongly
	5	Meets purpose very strongly

Table 1: Scoring for Site Assessments

Purpose a): To Check the Unrestricted Sprawl of Large Built-Up Areas & Purpose c): To Assist in Safeguarding the Countryside from Encroachment

3.20 The accompanying Green Belt Review by Nicholas Pearson Associates (NPA) (September 2018) provides an evaluation of the first and third Purposes, based on a landscape assessment. This is different from a landscape character assessment, and has instead focused on two main elements:

- In the case of Purpose a), the existing edge of settlement, boundaries of each site, and topography, natural and built features of each site. An overall evaluation is given of the extent to which each site could act to contain any future development.
- In the case of Purpose c), the land uses, vegetation, rural characteristics and urban elements of each site. An overall evaluation is given of the extent to which each site makes towards the purpose of safeguarding the countryside from encroachment.

3.21 Each Site is scored in the NPA Green Belt Review using the same methodology. The summary scores for each Site are included in the table at the end of Section 4 of this GBR.

Purpose b): To Prevent Neighbouring Towns Merging into One Another

3.22 Purpose b) considers whether, and to what extent, each Site is within a gap between settlements, and what role each Site plays in that gap.

- 3.23 The assessment of this purpose considers whether there are elements such as: topography; natural barriers; man-made barriers; and the distance between settlements; which would or would not lead to the towns merging or coalescing in the event the land was removed from the Green Belt.

Purpose d): To Preserve the Setting and Special Character of Historic Towns

- 3.24 The assessment of the fourth purpose considers whether, and to what extent, each Site protects land in the immediate and wider setting of historic towns. This purpose has particular relevance to St Albans City Centre.

Final Recommendations

- 3.25 As set out earlier, each purpose is of equal importance; therefore, a judgement must be taken to consider whether each Site performs strongly when assessed overall against the Green Belt purposes.
- 3.26 In providing final recommendations, reference is also made as to whether mitigation could be incorporated into a scheme to change the findings of the Assessment. Finally, recommendations for release, in purely Green Belt terms, are made.
- 3.27 These proposed releases would then need to be subject to further assessment to consider whether Exceptional Circumstances (in accordance with para 137 of the NPPF) exist to justify their release.

4.0 Assessment of Sites

Site R-551 Land north east of Redbourn

- 4.1 Site R-551 is located on the north eastern side of Redbourn. The Site adjoins the settlement of Redbourn on its southern and western boundaries. The assessed Site boundary is the A5183 (Redbourn Bypass), which runs from the southeast corner of the Site to its northernmost point.
- 4.2 Harpenden is the nearest town, located c.1.6km from the A5183 as the crow flies, at its nearest point. The following features are located between the two settlements:
- a) Rothamsted Estate: A large estate focused on agricultural research; there is a concentrated group of buildings forming the Rothamstead Campus and large areas of agricultural fields.
 - b) Redbourn Golf Club: To the north of the Site, Redbourn Golf Club includes a number of small scale buildings and car parking areas;
 - c) Harpenden Golf Course and Harpenden RFC: Harpenden Golf Course and the Rugby Club are located to the east of the Site, towards the south western side of Harpenden. The land includes a number of buildings and structures including floodlighting for the rugby club pitches.
 - d) Varied topography: The A5183 sits close to the bottom of a valley containing the River Ver (which is within the Site). The land then rises steeply to the east towards the Rothamsted Estate and includes an area of Ancient Woodland close to the ridgeline at the top of this area.
- 4.3 Site R-551 follows a line of urbanising features comprising the A5183 and development along the Harpenden Lane. Development of the land would not extend Redbourn closer to Harpenden than existing development along Harpenden Lane already has, whilst the topography and Ancient Woodland would prevent any visual association of the two settlements.
- 4.4 The Site is therefore considered to not to perform any function against Purpose b), scoring 0.
- 4.5 The south western corner of the Site abuts the Redbourn Conservation Area, including the Grade II listed Barn at Scout Farm. This part of the Conservation Areas was included in 2001 following amendments to the original boundaries. The majority of Redbourn Conservation Area and the historic core is focused along the High Street and south westerly through the Common area at the heart of Redbourn.
- 4.6 The Redbourn Conservation Area Character Statement (January 2011) (RCACS) includes particular reference to views from the northern end of the High Street into the village.
- 4.7 The Site is not referenced in the RCACS as providing any particular contribution to the setting or character of the Conservation Area, or the

wider settlement. The immediate part of the Site abutting the Conservation Area and the Grade II Listed Scouts Farm Barn will serve some limited purpose as an arable field in that context, but the overall Site area is not assessed as performing against Purpose d). The Site therefore scores 2 when considered against Purpose d).

OS-400c East Hemel Hempstead (South)

- 4.8 OC-400c is located on the eastern side of Hemel Hempstead, adjacent to the M1 and Junction 8 with the access from the A414 providing the northern and eastern boundaries.
- 4.9 St Albans is the nearest settlement, located c.3.8km east of the Site. The following features are located between the settlements:
- a) The M1 and associated structures adjoin the Site to the east and provide a hard boundary. There are a number of gantries and signs in this area.
 - b) The Gorhambury Estate: this includes a large woodland area and managed plantations. There are some buildings, including the main house, within this area albeit they are generally not visible from wider viewpoints.
 - c) The River Ver valley: The land falls towards the north where the Upper Ver Valley is situated. There are some smaller ridgelines running west/east located through the general Gorhambury Estate area.
- 4.10 The hard boundary provided by the M1 clearly demarks this Site from the countryside beyond. St Albans, nearly 4km to the east from the Site boundary, is not readily visible. Due primarily to the M1, the Site does not perform any function at separating Hemel Hempstead or St Albans. It therefore does not perform any function against Purpose b) and scores 0.
- 4.11 The Site does not abut any historic areas or Conservation Areas and is not readily visible from St Albans to the east. There are some listed buildings along Westwick Row on the southern boundary. The Grade II Gorhambury Park and Garden is located east of the M1 and is described as having a rural setting in the Historic England listing (List Entry Number: 1000417).
- 4.12 The Site does not perform any function against Purpose d) and scores 0.

OS-400d South East Hemel Hempstead

- 4.13 Site OS-400d is located directly south of OS-400C, sharing a common boundary.
- 4.14 Due to its location, and the presence of the M1, Site OS-400d is assessed the same as OS-400C. It similarly scores 0 against Purpose b) and Purpose d).

OS-400a East Hemel Hempstead (North)

- 4.15 Site OS-400a is located on the north side of the A414 from OS400c. It is similarly bounded by the M1 to the east but whilst Site OS400c is assessed

against the gap to St Albans, OS400a is assessed against the gap to Redbourn.

- 4.16 The southernmost point of Redbourn is c.850m from the northernmost tip of this Site. The land drops into a valley towards this point, with the M1 sat on an embankment above the surrounding land. There are a number of agricultural buildings as well as the Aubrey Plaza hotel. There is also pockets of mature trees closer to and beyond the Site boundaries which provide further screening.
- 4.17 Due to the topography, M1 and vegetation, there is little visual association between this Site and Redbourn. However, due to the short distance between the northern point of the Site and the southern point of Redbourn, the Site does perform a role in maintaining a gap between the two settlements. This is particularly relevant to the size and scale of Hemel Hempstead, with the gap appearing relatively small in that context.
- 4.18 There are no readily recognisable physical features in the Site which could be used to define an alternative, smaller boundary that would increase the gap between the settlements. Therefore, there is no case for an alternative Green Belt boundary to the assessed Site boundary.
- 4.19 The Site therefore performs a strong role against Green Belt Purpose b) and scores 4.
- 4.20 Like Sites OS-400c and OS-400d, the Site does not abut a historic town or Conservation Area. To the north east of the Site is the Aubreys Scheduled Ancient Monument, whilst the south western point of the Redbourn Conservation Area extends towards the Site.
- 4.21 For similar reasons to the assessment of Purpose b), the Site will have some limited impact upon the setting of Redbourn. Due to the proximity of the Site and the potential closure of this gap, the Site does perform a relatively weak function in maintaining that separation and setting. The Site therefore scores 1 against Purpose d).

OS-602 North Hemel Hempstead

- 4.22 Site OS-602 is located on the north-eastern edge of Hemel Hempstead. The B487 forms the Site's southern boundary, which is a common boundary with Site OS-400a. The eastern boundary of the Site is not clearly defined and lacks any physical features to form a defensible, durable Green Belt boundary.
- 4.23 The Site is c.1.2km from the southern point of Redbourn. It does not perform as strong a role in maintaining the gap between Hemel Hempstead and Redbourn as Site OS-400a, but development here would still lead to a reduction in this gap. The Site therefore scores a 3 against Purpose b).
- 4.24 Site OS-602 is further separated from the edge of Redbourn Conservation Area. Therefore, whilst it still partly contributes to the gap between settlements, unlike OS-400a, the Site plays no role in preserving the setting or special character of Redbourn. The Site therefore scores a 0 against Purpose d).

H-595 North West Harpenden

- 4.25 Site H-595 is located on the northern side of Harpenden, adjacent to the Luton Road. The land slopes from the north east down to the south west, towards Harpenden.
- 4.26 The north western part of Harpenden contains the Site, meaning it does not have any relationship with Redbourn to the south west. Luton is the nearest major settlement to the north, some 4.6km away. The land between the Site and Luton is a mixture of hillsides and sloping valley towards the River Lea. The edge of Luton is not readily visible from the Site and the Site does not perform an important role in the gap between the settlements.
- 4.27 The Site is well contained by existing built form in Harpenden and local topography and does not perform a strong function in respect of this purpose. The Site therefore scores a 0 against Purpose b).
- 4.28 The Site is close to the Harpenden Oval within the Harpenden Conservation Area. The Harpenden Oval is a self-contained development, included in the Conservation Area as an example of an early 20th Century children's home built on "garden suburb" lines⁵. There is also the Grade II listed Cooters End Farm in the centre of the Site.
- 4.29 Release of the Site from the Green Belt would not impact upon the setting of this self-contained part of the Conservation Area, as that is inward focused. The Site does not abut the historic core of the town and therefore does not contribute to Purpose d), scoring 0 against this purpose.

H-583 North East Harpenden

- 4.30 Site H-583 is located on the north eastern side of Harpenden on the Lower Luton Road B653. It is formed of two slightly different parcels. The western parcel sits on a reasonably steep slope, with the land falling east to west towards the B653.
- 4.31 The eastern parcel sits behind residential development, a school and allotment area and is a small valley area with a more modest slope running north west to south east. There is a strong mature tree belt along the eastern side of the Site along Common Lane, which extends along Sauncey Wood Lane.
- 4.32 There are a number of small villages and hamlets to the north east and east of the Site as you head towards Welwyn, the next town which is some 8km to the east.
- 4.33 The topography of the land, combined with the presence of mature trees, means the Site is not readily visible from the main settlements to the east.
- 4.34 Due to the distance of the Site to the nearest town and its topography the Site scores a 0 against Purpose b).
- 4.35 The Site does not abut any historic areas or Conservation Areas. The Site does not contribute to the setting or special character of a historic town.

⁵ Paragraph 8.1, p.10 Conservation Area Character Statement for Harpenden, April 2008

- 4.36 The Site does not therefore perform any function against Purpose d) and scores 0.

SA-605 North St Albans

- 4.37 Site SA-605 is located on the northern edge of St Albans, adjacent to range of different land uses. To the south are residential areas with the St Albans Girls School, with a modest sized rectangular industrial area to the south east.
- 4.38 The eastern site boundary is formed by the mainline railway running north – south into St Albans. To the north are a mixture of agricultural fields and Wollam Playing fields.
- 4.39 Harpenden is the nearest town, located c.2.3km north of the Site. The railway line and the A1081 provide both a physical and visual connection between the two settlements, and therefore whilst, at a distance of over 2km, there is a reasonable degree of separation between the two places, the feeling of separation is much smaller.
- 4.40 The Site sits within this gap and does provide a role at maintaining this separation. Development here would extend the built up area of St Albans closer to Harpenden along major transport routes and therefore the land does perform against this purpose by contributing to the separation of the two settlements. The Site therefore scores a 3 when assessed against Purpose b).
- 4.41 When assessed against Purpose d), the Site does not sit close to any of the historic parts of St Albans. There are however the Conservation Areas of Chidwickbury and Harpenden to the north east and directly north. The latter includes the Common, which is one of the major features of the Conservation Area and is described as having *“long dramatic views from the highest points of the common as the town is approached from the south⁶”*.
- 4.42 The Site will bring development closer to this Conservation Area, and in particular the setting of the Common and the long distance views offered by it. Therefore, whilst the Site does not abut this historic area, it does offer some context for the setting of both Harpenden and St Albans and therefore does contribute to Purpose d). The Site is assessed as scoring 3.

Site SM-626 Oaklands College, Smallford (East St Albans)

- 4.43 Site SM-626 Oaklands College is an expansive area of land on the eastern side of St Albans. It comprises a mixture of uses, with the College at the centre of the Site. Due to the extensive Site coverage, there are also a variety of land uses bordering the Site.
- 4.44 To the west and partway along the northern and southern boundaries are the suburban residential parts of St Albans, including two schools. To the south east is a large commercial area containing both out of town retail units and mixed industrial units. This wraps around the Site in its south eastern corner, where it also includes some residential development.

⁶ Paragraph 15.1, p.16 Conservation Area Character Statement for Harpenden, April 2008

- 4.45 There are mineral workings to the north east, with arable land between these uses and beyond as well as interspersed areas of woodland.
- 4.46 The major settlement of Hatfield is located c.1.5km from the south eastern corner of the Site. The land between the Site and Hatfield is relatively flat when taken across its whole area, whilst the A1057 provides a link between the Site and Hatfield.
- 4.47 The commercial development in the south east has already extended the built up area of St Albans in the gap towards Hatfield. This is however in a relatively narrow corridor, when compared to the sprawl of St Albans to the north and that proposed by the subject Site. Oaklands Lane provides a defensible boundary along the north-eastern/eastern part of the Site.
- 4.48 The Site does therefore provide some contribution to the gap between settlements, albeit the contribution has been diminished by development along the A1057 and in the southern part of Oaklands Lane. The Site is therefore assessed as scoring 2 against Purpose b).
- 4.49 The Site does not abut any historic areas or Conservation Areas. The Site does not contribute to the setting or special character of a historic town.
- 4.50 The Site does not therefore perform any function against Purpose d) and scores 0.

Site LC-621 Land West of London Colney

- 4.51 Site LC-621 is on the western side of London Colney. It has strong permanent boundaries on the western and southern sides, comprising a railway line (west) and the M25 (south). To the north is the historic Napsbury Park, a residential development on the former asylum site.
- 4.52 The land would have formed part of a strategic gap between London Colney, St Albans to the north and Frogmore to the west. However, the Napsbury Park development creates a significant residential presence in this gap, extending close to the railway line.
- 4.53 The presence of this development, and in particular its location, weakens the role that the remaining area of land plays in separating the settlements. The land does still perform some function in maintaining a degree of separation from Frogmore to the west, but it is limited.
- 4.54 The Site is therefore assessed as scoring 2 against Purpose b).
- 4.55 The Site sits adjacent to the historic Napsbury Hospital, former Middlesex County Asylum which is Grade II listed. The Site has a functional relationship with the wider setting of the former Asylum.
- 4.56 The Asylum, whilst a historic park containing historic buildings, is not within the core historic part of London Colney; it does however provide a key historic part of the wider St Albans setting. The Site, adjoining this area, sits within associated farmland within the setting of this area. Whilst the Site has been developed, the remaining farmland provides character to the backdrop against which the Asylum was created.

- 4.57 The Site therefore performs a strong function against Purpose d), affecting the setting and character of St Albans from this historic development. It therefore scores a 5 against this purpose.

PS-607 Former Radlett Aerodrome

- 4.58 Site PS-607 is located on the western side of the railway line from Site LC-621. It is on the western edge of Frogmore and has durable permanent boundaries on all sides comprising the A414 North Orbital Road to the north, railway line to the east and M25 to the south.
- 4.59 The land is gently undulating and includes part of the River Ver valley in the north. The railway line, which separates the Site from LC-621, sits in a cutting for some of its length, and is mostly screened from the Site by existing trees and vegetation. Beyond the M25 to the south is Ventura Park, a large logistics and industrial area.
- 4.60 Like Site LC-621, this Site forms part of the gap between St Albans, Frogmore and London Colney. However, unlike Site LC-621, this Site does not include built form either within it (other than a small area of farm buildings) or extending out of Frogmore in the fashion that Napsbury Park does on Site LC-621.
- 4.61 The Site therefore is the last remaining undisturbed gap between these settlements. Development here would lead to the merging of the settlements, despite the presence of the railway line. Whilst the railway line does provide a boundary, it is common to have a single settlement developed on either side of a line and development of this Site would result in the land being interpreted as one settlement.
- 4.62 Whilst Ventura Park is on the other side of the M25, it similarly would merge with the settlement in the same fashion and lead to a reduction in the gap towards Radlett.
- 4.63 For these reasons the Site is considered to perform a very strong function in maintaining separation between the different settlements and therefore scores a 5 against Purpose b).
- 4.64 The Site includes land at Burydell Lane within the Park Street Conservation Area at Frogmore. The remainder of the Site's western boundary abuts much of the Conservation Area.
- 4.65 The Conservation Area Character Statement for Park Street and Frogmore (April 2001) references the problems that the presence of the industrial estate and heavy lorry traffic have upon the setting of the Conservation Area. It also identifies the importance of the River Ver, where it runs through the Conservation Area, and the benefits additional planting could make to the Area. The Statement does not make any particular reference to the wider land to the east as being important to the character of the Conservation Area.
- 4.66 The Site in that context, particularly with the existing industrial estate, does not therefore play a particularly strong purpose in the setting of the historic core of this settlement. Similarly, whilst it reduces the gaps between settlements, development here would not have a specific impact

upon the historic parts of St Albans or London Colney. Despite the presence of Napsbury Park, the railway line separates the Site from that area sufficiently to distinguish the Site from the setting of that historic area.

4.67 The Site is therefore assessed as scoring 1 against Purpose d).

Site CG-561 Chiswell Green

4.68 Site CG-561 is located on the western side of Chiswell Green, between the settlement and the 'Garden of the Rose' gardens and former headquarters of the Royal National Rose Society, along with the former Butterfly World visitor attraction.

4.69 The Site gently slopes from the north west back towards Chiswell Green in the east and is bordered by residential development on its eastern boundary. Chiswell Green Lane provides a permanent boundary to the north with Miriam Lane, the former access road to the Garden of the Rose, providing the western boundary.

4.70 The settlements of Bedmond and Kings Langley are located to the west, beyond the M1, with Bedmond the closest at c.3km away. Bedmond benefits from a large area of woodland on its eastern side enclosing the village, whilst the M1 and intervening fields provide further separation.

4.71 The location of the Site between the Garden of the Rose/ Butterfly World and Chiswell Green, means that it does not sit in an important gap between settlements. This point is further enhanced by the large distance to Bedmond and Kings Langley, with no direct transport routes between the two.

4.72 The Site therefore does not perform any function against Purpose b) and scores 0.

4.73 The Site does not abut any historic areas or Conservation Areas. The Site does not contribute to the setting or special character of a historic town.

4.74 The Site does not therefore perform any function against Purpose d) and scores 0.

Summary of Scoring

Site Reference	Purpose a) Score	Purpose b) Score	Purpose c) Score	Purpose d) Score
R-551 North East Redbourn	1	0	2	2
OS-400c East Hemel Hempstead (South)	3	0	4	0
OS-400d South East Hemel Hempstead	5	0	4	0
OS-400a East Hemel Hempstead (North)	3	4	2	1
OS-602 North Hemel Hempstead	5	3	5	0
H-595 Land at North West Harpenden	3	0	1	0
H-583 Land at North East Harpenden	1	0	3	0
SA-605 North St Albans	3	3	2	3
SM-626 Oaklands College, Smallford (East St Albans)	1	2	2	0
LC-621 Land West of London Colney	3	2	3	5
PS-607 Former Radlett Aerodrome	1	5	1	1
CG-561 Land at Chiswell Green	1	0	1	0

Table 2: Summary Scoring of Site Assessments

5.0 Recommendations

- 5.1 The Assessment has identified three main bandings of Sites:
- a) Sites which make little or no contribution to all 4 Green Belt purposes (coloured green in Table 2);
 - b) Sites which make a moderate contribution to Green Belt purposes (coloured amber in Table 2);
 - c) Sites which make a strong contribution to 1 or more of the Green Belt purposes (coloured red in Table 2).
- 5.2 Sites R-551 North East Redbourn, SM-626 Oaklands College and CG-561 Chiswell Green all make little or no contribution to Green Belt purposes. These Sites all scored 2 or lower against each of the four purposes. It is therefore considered that if exceptional circumstances exist to justify amending Green Belt boundaries, these Sites could be removed from the Green Belt without harming Green Belt purposes.
- 5.3 Sites H-595 Land at North West Harpenden, H-583 Land at North East Harpenden and Site SA-605 North St Albans all make a moderate contribution to Green Belt purposes. Each of the Sites scored no higher than 3 against one or more purposes, meaning they do serve some purpose but may be capable of removal from the Green Belt without causing significant harm to the Green Belt.
- 5.4 Finally, Sites OS-400c, OS-400d, OS-400a, OS-602, all East and North of Hemel Hempstead; Site LC-621 West of London Colney and Site PS-607 Former Radlett Airfield all make a strong contribution to 1 or more of the four Green Belt purposes.
- 5.5 In the case of the Sites on the edge of Hemel Hempstead, Sites OS-400c and OS-400d both made strong contributions to purposes a) and c) and so their release would lead to urban sprawl and encroachment upon the countryside.
- 5.6 Site OS-400a (East Hemel Hempstead North) provides an important contribution to maintaining the gap between Hemel Hempstead and Redbourn. Site OS-602 (North Hemel Hempstead) meanwhile would provide a less important role to preserving the gap, but, like Sites OS-400c and OS-400d development of the land would lead to urban sprawl and encroachment upon the countryside.
- 5.7 The two Sites either side of the railway line south of St Albans, namely LC-621 (Land West of London Colney) and PS-607 (Former Radlett Aerodrome) both perform strong Green Belt purposes in one category, and little or no in the other categories. Site LC-621 has a significant impact upon the setting of Napsbury Park, which is a historic development on the south side of St Albans. Development of Site PS-607 meanwhile would lead to the closure of the gap between a number of settlements and coalescence as a result.
- 5.8 In summary, of the 12 Sites assessed:

- a) 3 Sites make little or no contribution to Green Belt purposes; these Sites should be considered further for Green Belt release.
- b) 3 Sites make a moderate contribution to Green Belt purposes. These Sites should also be considered for release as there may be potential either for mitigation, or compensatory Green Belt, to outweigh the harm arising from their release.
- c) 6 Sites make a strong contribution to one or more Green Belt purposes. In the Case of LC-621, this relates to the impact of the setting of a historic part of St Albans. Site LC-621 should be considered further to assess whether mitigation can reduce the impact such that the Site would no longer perform a strong Green Belt function.

Appendix 1: St Albans City and District Local Plan Strategic Site Evaluation

ST ALBANS CITY AND DISTRICT COUNCIL

<u>REPORT TO :</u>	Planning Policy Committee
<u>DATE :</u>	22 May 2018
<u>REPORT TITLE :</u>	Local Plan – Draft Strategic Site Selection Evaluation Outcomes
<u>WARDS :</u>	All
<u>PORTFOLIO HOLDER:</u>	Cllr Mary Maynard
<u>CONTACT OFFICER :</u>	Tracy Harvey - Head of Planning and Building Control

1.0 **Purpose Of Report**

- 1.1 To report the draft outcomes of the strategic site selections following the Call for Sites consultation.

2.0 **Recommendations**

- 2.1 That the Head of Planning and Building Control (HPBC) moves forward with the process outlined in this report, taking into account any comments made by the committee. This includes any comments made by email to the HPBC before Monday 28 May.
- 2.2 That draft finalised evaluation forms be reported to the Committee's June 2018 meeting.

3.0 **Background Information**

- 3.1 As agreed at Planning Policy Committee (PPC) and Cabinet in November 2017, alongside the Local Plan (LP) Regulation 18 consultation ran a 'Call for Sites'. This was seeking submissions from landowners/developers/promoters for potential development land. The 'Call for Sites' ran from 9 January 2018 to 21 February 2018. As agreed at PPC and Cabinet, this Call for Sites was focussed primarily on sites for residential development, but was also open to sites for other uses. This included sites for Employment, Health, Schools, Gypsy and Traveller and 'Other' uses.
- 3.2 At its April 2018 meeting the Committee received a report on the analysis of the responses to the consultations. This included both the LP Regulation 18 consultation and the associated Call for Sites. This report included a schedule of sites submitted to the Call for Sites as well as a map of these submitted sites.
- 3.3 The January 2018 report considered by the committee set out:

Call for sites

...

The next step in the consideration of sites put forward will be a review of options for meeting development requirements, including:

making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;

the potential offered by land which is currently underused, including surplus public sector land where appropriate;

optimising the proposed density of development;

and exploring whether other authorities can help to meet some of the identified development requirement.

It is likely that to meet development requirements consideration will need to be given to releasing land from the Green Belt. As set out in previous Planning Policy Committee reports, by definition, as not being part of the identified 8 locations identified as causing 'least damage' to Green Belt purposes, any other locations would cause a higher degree of damage to Green Belt purposes.

The Council, once the details of the new sites have been received, will need to consider if there are any unique opportunities that might be provided in association with any sites put forward that might override the additional level of damage to Green Belt purposes. Including (for these and the 8 sites identified in the Green Belt Review) how the impact is to be offset by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land. This could, for example, include community forests, nature reserves or allotments. As set out in previous Planning Policy Committee reports, other factors to consider might be:

1 - Unique contribution to improve public services and facilities, eg public transport

2 - Unique contribution to enhancing local high quality job opportunities and the aspirations of the Hertfordshire Local Economic Partnership / Hertfordshire EnviroTech Enterprise Zone

3 - Unique contribution to other infrastructure provision or community benefits

The Housing White Paper is suggesting that local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs.

- 3.4 The March 2018 PPC Report entitled “Local Plan - Development Strategy and Draft Strategic Site Selection Process” developed this outline process further. This report presents evaluations of all potential strategic scale sites.
- 3.5 It was previously agreed at PPC’s March meeting that strategic scale sites are those that are “capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land”. The evaluations cover responses to the 2018 ‘Call for Sites 2018’ and previous Strategic Housing Land Availability Assessment (SHLAA) submissions.
- 3.6 As agreed at March’s PPC meeting, each site has been evaluated using a Red Amber Green (RAG) system. Each site has been assessed against three stages and eight criteria as follows:

Stage 1

1. *Green Belt Review (GBR) evaluation*

Stage 2

2. *Suitability*
3. *Availability*

Stage 3

4. *Unique contribution to improve public services and facilities*
5. *Unique contribution to enhancing local high quality job opportunities*
6. *Unique contribution to other infrastructure provision or community*
7. *Deliverable / Achievable*
8. *Overall Evaluation*

- 3.7 As agreed at March’s PPC meeting, any Red rating given at Stage 1 or Stage 2 rules the site out for further consideration.

4.0 Analysis and Findings

- 4.1 A schedule of the potential strategic sites are presented at Appendix 1 to this report. Appendix 1 is split into two tables. Table 1 is a list of sites that meet the strategic scale site thresholds set out in paragraph 3.5 above. All sites have a unique reference number and are listed in order of this reference number.
- 4.2 Table 1 summarises each strategic scale site, including its site area and indicative capacity at 40dph on 60% of the site. The indicative capacity is worked out on 60% of the site as the remaining 40% is expected to be used for site infrastructure, such as roads, schools and recreational space. Sixty percent is therefore considered to provide a more accurate indicative capacity than if the whole site were to be considered. Indicative dwelling numbers have been rounded up to the nearest whole dwelling. The RAG rating for each criteria, as detailed in paragraph 3.5 above, is also included.

- 4.3 Where a site has been given an overall rating of Green or Amber, a further more detailed SADC capacity estimate has been included. This is due to further work having been carried out on these sites by looking at the land area available and infrastructure requirements and opportunities. As a result of this, a more detailed estimate has been able to be provided.
- 4.4 The thresholds agreed by PPC at its March 2018 meeting were “sites capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land”. A number of sites have been submitted which are not small, but also do not meet the scale or capacity thresholds agreed. Although these sites can be noted for general awareness, they fall sufficiently below the overall scale and dwelling capacity to not be taken forward to Stage 1 assessment. Such sites, between 10.5h and 14h dwellings or of a capacity of 375-500 dwellings, are therefore included as Table 2 of Appendix 1. Other sites included in Table 2 include those which have been superseded by new site submissions with similar site boundaries, and those which have been constructed since the submission.
- 4.5 Consideration has also been given to combined sites. These are made up of two or more sites where they can be combined with adjoining sites to meet the threshold and could potentially allow for a comprehensive form of development. In these cases the combined sites have been allocated a unique reference number and assessed as a larger parcel. Where two or more strategic sites are adjoining and could be combined to form a single site, these have not been separately assessed, as the individual sites will have been assessed and the evaluation forms can be read in conjunction. Where sites have been combined to form one, larger site, the reference numbers of its constituent sites are included in brackets in the site details columns of both tables.
- 4.6 There is a map of the Table 1 (Appendix 1) strategic scale sites at Appendix 2a. The combined sites referred to in paragraph 4.4 above and within Table 2 of Appendix 1, are included as Appendix 2b. The evaluation forms are at Appendix 3. The methodology for the assessments are as agreed in the March 2018 PPC meeting.
- 4.7 The independent Green Belt Review (GBR) identifies strategic land parcels, and assessed each parcel against its level of contribution to the 5 Green Belt purposes. The level of contribution could be ‘Significant’, ‘Partial’ or ‘Limited/No’. For Stage 1, any ‘Significant’ or ‘Partial’ assessments against any of the 5 purposes have been quoted in italics in the evaluation forms.
- 4.8 An issue of presentation was encountered by officers when applying the methodology for steps 4,5 and 6 as originally outlined in the March 2018 PPC Report. The methodological approach and written content for each assessment is as originally agreed by the Committee. However, in applying a RAG rating system to this analysis, it was considered potentially clearer to leave the ratings as Green (as no sites were being be ‘ruled out’ through these steps). The commentary provides the analysis and the use of the RAG ratings can be considered further as the draft is finalised.

- 4.9 The committee is reminded that the GBR provided indicative boundaries for the strategic sites. The GBR explicitly set out that these indicative boundaries would need to be looked at further in determining what should be finalised boundaries for a Local Plan. These current assessments are based on evolving considerations, including opportunities to deliver additional housing. It is expected that the Local Plan/masterplanning process will review the indicative boundaries and bring forward final boundaries.
- 4.10 Some of the strategic scale sites will have been given an evaluation against Stage 1 of Red, were 'shortlisted' as part of the 2009 Strategic Housing Land Availability Assessment (SHLAA). It should be noted that the SHLAA was only a very high level document and sites 'shortlisted' in it were not assessed in the context of a strategic GBR. The GBR is at the core of this Strategic Sites Selection methodology which effectively supersedes the 2009 SHLAA.
- 4.11 The evaluation forms conclude that 8 sites have an overall evaluation of Green. These are the same 8 sites that were concluded in the GBR as making the least contribution towards Green Belt purposes. These sites are East Hemel Hempstead (North), East Hemel Hempstead (South), Land at Chiswell Green, North East Harpenden, North West Harpenden, North St Albans and East St Albans.
- 4.12 The evaluation forms concludes that 4 sites have an overall evaluation of Amber. These sites are South East Hemel Hempstead, North Hemel Hempstead, the Former Radlett Aerodrome and North East Redbourn.

Next Steps

- 4.13 As agreed at the March meeting of PPC, developers of the sites scoring an overall evaluation of Green or Amber will be invited to present their schemes. These presentations will be considered by an Evaluation Validation panel. This will comprise the Chair of PPC and up to 3 Councillors selected from PPC. This is due to take place on 23 May and 24 May 2018.

5.0 Conclusion

- 5.1 This report gives the Committee an opportunity to comment on the draft evaluation forms.
- 5.2 This initial draft shows 8 Green sites and 4 Amber sites passing step 8 of the evaluation. Developers of these sites will be invited to present their schemes on 23 and 24 May 2018.

6.0 Implications

- 6.1 This table provides a short statement of the impact of the recommendations in this report and / or a reference to the relevant paragraph/s in the report.

Will this report affect any of	Yes/No	Impact/Reference
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the following?		
Vision and Priorities	Yes	Whole report relates to planning for the future. However there are no direct implications from this report because decisions are not required at this point.
Policy	Yes	As for Visions and Priorities above
Financial	No	As for Visions and Priorities above
Impact on the community	Yes	As for Visions and Priorities above
Legal and Property	No	As for Visions and Priorities above
HR/Workforce	No	As for Visions and Priorities above
Risk Assessment	No	As for Visions and Priorities above
Environmental Sustainability	Yes	As for Visions and Priorities above
Health and Wellbeing	Yes	As for Visions and Priorities above

7.0 **Further Information/Appendices**

7.1 Appendix 1 Schedule of strategic sites

7.2 Appendix 2a Strategic sites map

7.3 Appendix 2b Combined sites map

7.4 Appendix 3 Site assessment forms

8.0 **Background Papers - Local Government (Access to Information) Act 1985**

APPENDIX 1 Schedule of strategic sites

Table 1

Table Ref.	Site – inc. Area (Ha) and Indicative Capacity @40dph [dwellings]	1. Green Belt Review evaluation (RAG)	2. Suitability (RAG)	3. Availability (RAG)	4. Unique contribution to improve public services and facilities (RAG)	5. Unique contribution to enhancing local high quality job opportunities (RAG)	6. Unique contribution to other infrastructure provision or community (RAG)	7. Deliverable / Achievable (RAG)	8. Overall Evaluation (RAG)
1	Burston Garden Centre, Hertfordshire Fisheries, Burston Nurseries HW-13 15.5ha (60% = 9.3ha) 372 dwellings	RED							RED
2	Land on the west side of Redbourn (between the built up area and the M1 motorway), possibly including land adjoining Stephens Way (Site No. 139) R-22 17.8ha (60% = 10.68ha) 428 dwellings	RED							RED
3	Land at A1081/Nightingale Lane/ Highfield Park Drive/London Road SA-74a 14.1ha (60% = 8.46ha) 339 dwellings	RED							RED
4	Land at A1081/Nightingale Lane/ Highfield Park Drive/London Road SA-74 (Combines SA-74a, 74b, 74c) 19.5ha (60% = 11.7 ha) 468 dwellings	RED							RED
5	Between the A4147 and the M10, extending beyond the M10 to Potters Crouch and the edge of Chiswell Green SA-87 170.8ha (60% = 102.48ha) 4100 dwellings	RED							RED
6	North east of Redbourn (north of Harpenden Lane, east of Dunstable Road and west of the	RED							RED

	SADC estimate: 900 dwellings (+348 permitted)								
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Consideration has been given to combined sites. These are made up of two or more sites where they can be combined with adjoining sites to meet the threshold and could potentially allow for a comprehensive form of development. In these cases the combined sites have been allocated a unique reference number and assessed as a larger parcel. Where two or more strategic sites are adjoining and could be combined to form a single site, these have not been separately assessed, as the individual sites will have been assessed and the evaluation forms can be read in conjunction.

The thresholds agreed by PPC at its March 2018 meeting were "sites capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land". A number of sites have been submitted which are not small, but also do not meet the scale or capacity thresholds agreed. Although these sites can be noted for general awareness, they fall sufficiently below the overall scale and dwelling capacity to not be taken forward to Stage 1 assessment. Sites between 10.5ha and 14ha dwellings or of a capacity of 375-500 dwellings are therefore noted below.

Other sites included in the table below include those which have been superseded by new site submissions with similar site boundaries, and those which have been constructed since the submission.

Table 2

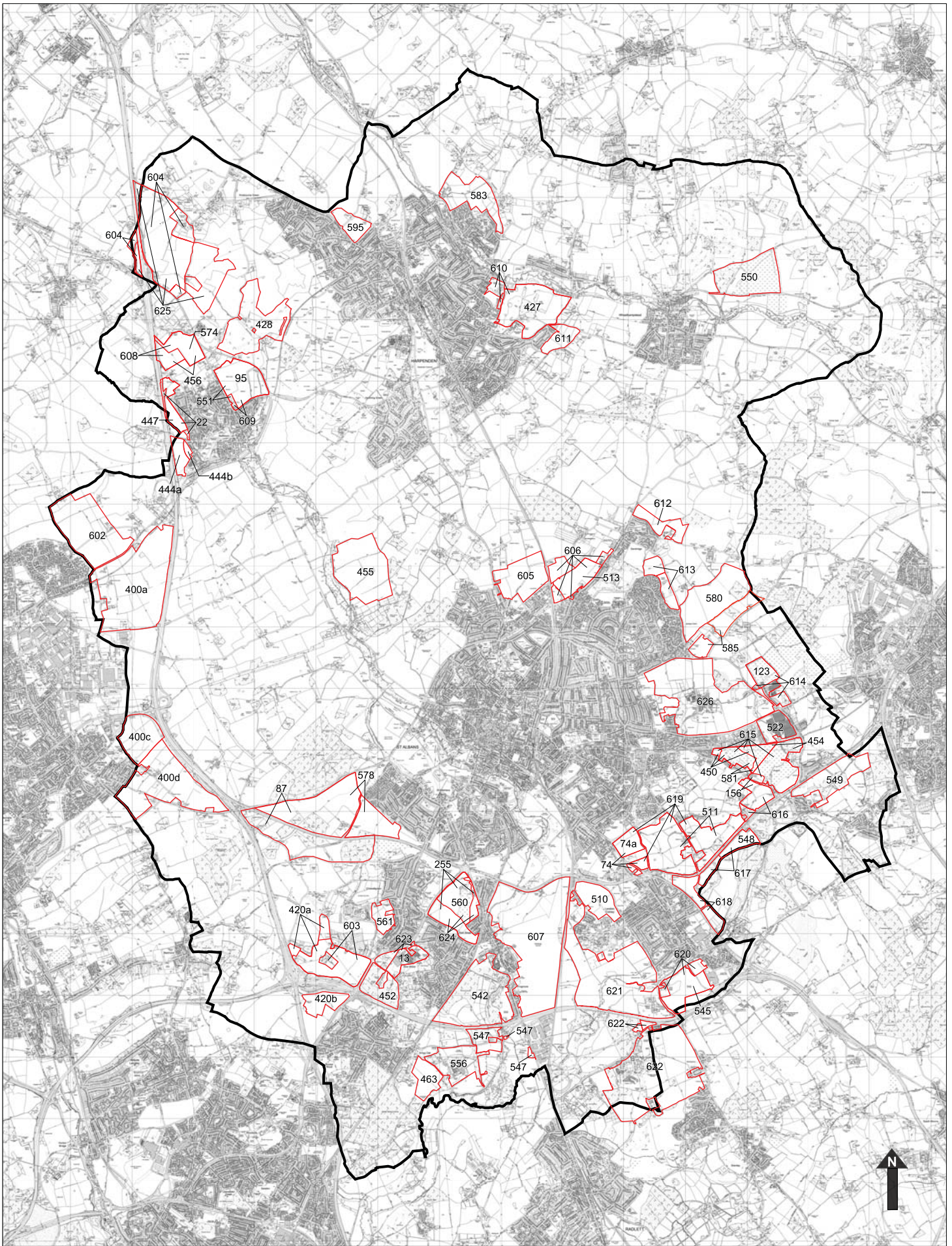
Site – inc. Area (Ha) and Indicative Capacity @40dph [dwellings]	Notes
Land, North of Tippendell Lane, How Wood PS-14 11.5ha (60% = 6.9ha) 276 dwellings	Subset of both PS-255 and PS-624 which have been considered in the above assessment. In isolation, the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
East of Redbourn and West of A8183 R-18 13.5ha (60% = 8.1ha) 324 dwellings	Site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
East of A414 London Colney roundabout, south of A414, north of A1081 LC-31 12.8ha (60% = 7.68ha) 308 dwellings	Subset of LC-618 which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
Land R/O 113-167 Colney Heath Lane SA-78 11.2ha (60% = 6.72ha) 269 dwellings	Subset of SM-615 which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
North of Five Acres, south of the M25, Bricket Wood BW-89 9.3ha (60% = 5.58ha)	Site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.

<p>224 dwellings</p> <p>Waterdell, Mount Pleasant Lane, Bricket Wood BW-141 10.5ha (60% = 6.3ha) 252 dwellings</p>	<p>Site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>Rear of Shottfield Close S-151 10ha (60% = 6ha) 240 dwellings</p>	<p>Subset of S-612 which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>Building Research Establishment, Bucknalls Drive BW-153 25.8ha (60% = 15.48ha) 620 dwellings</p>	<p>This is part of the wider BRE site, which is an important asset within the District and which is being retained. Planning permission has been granted for 100 dwellings on the northern portion of the site. No recent submissions have been received promoting development within the thresholds of this assessment.</p>
<p>Harperbury Hospital, Harper Lane, London Colney LC-254 46ha (60% = 27.6ha) 1104 dwellings</p>	<p>Two significant developments at the former hospital site have been constructed and there are currently 206 homes currently under construction. The rest of the site that is within St Albans District does not fall within the thresholds for this assessment. This is a subset of S-622 which has been considered in the above assessment.</p>
<p>Land to the rear of Bridge Cottage, Sandridgebury Lane, Near Sandridge S-290 9.9ha (60% = 5.94ha) 238 dwellings</p>	<p>Subset of S-606 which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>Caxton Centre & Valley Road Industrial Estate, Porters Wood, St Albans SA-301 11.5ha (60% = 6.9ha) 276 dwellings</p>	<p>Site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>HSBC Training Centre, Smug Oak Lane BW-329 65ha (60% = 39ha) 1560 dwellings</p>	<p>This site is superseded by BW-556, which has been considered in the above assessment.</p>
<p>Land to the north east of Sparrowswick Ride and Townsend School, St Albans SA-333 13.2ha (60% = 7.92ha) 317 dwellings</p> <p>Land East of Hemel bound B487 OS-400 a, b, c and d combined 351ha 4000 dwellings</p>	<p>Site not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p> <p>Considered as separate parcels OS-400a, b, c and d in the assessment above.</p>

Land to the east of Station Road and Oaklands Lane Smallford SM-403 11.3ha (60% = 6.78ha) 272 dwellings (at 100% = 452 dwellings)	Subset of SM-614, which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
Bedmond Lane St Albans SA-418 132.5ha (60% = 79.5ha) 3180 dwellings	Subset of SA-578, which has been considered in the above assessment. In isolation the site not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
Land at Noke Lane, south of Chiswell Green CG-420a 56.5ha (60% = 33.9ha) 1356 dwellings	This site is superseded by CG-603, which has been considered in the above assessment.
All Saints Pastoral Centre, Shenley Lane LC-423 20.7ha (60% = 12.42ha) 497 dwellings	Subset of LC-621, which has been considered in the above assessment.
Land to the south of Harpenden Lane, Redbourn. R-425 9.88ha (60% = 5.93ha) 238 dwellings	Site not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
Land east of Watling Street, St Albans SA-438 11.7ha (60% = 7.02ha) 281 dwellings	Site not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
Land north of St Albans, R/O St Albans Girls School SA-439 39.4ha 1000 dwellings	Subset of site SA-605, which has been considered in the above assessment.
Land at Gaddesden Lane, Redbourn R-444a 11.8ha (60% = 7.08ha) 284 dwellings	Subset of R-444a and b, which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
Land north of Hemel Hempstead OS-449 20.3ha (60% = 12.18ha) 488 dwellings	Part subset of OS-602, which has been considered in the above assessment.
Land west of London Colney LC-453 25.8ha	Subset of LC-621, which has been considered in the above assessment.

<p>320 dwellings Land at northeast edge of St Albans S-466 10ha (60% = 6ha) 240 dwellings</p>	<p>Subset of S-613, which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>Former Butterfly World, Miriam Lane, Chiswell Green, St Albans CG-503 12.7ha (60% = 7.62ha) 305 dwellings</p>	<p>Site not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>Land to the rear of Oaklands College SM-507 13.4ha 348 dwellings</p>	<p>Planning permission has been granted for 348 dwellings on this site. This site is a subset of site SM-528, which has been considered in the above assessment. The site is not capable in isolation of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>Napsbury Rural Estate – South LC-509 86.4ha (60% = 51.84ha) 2074 dwellings</p>	<p>Subset of LC-621, which has been considered in the above assessment.</p>
<p>Former Radlett Aerodrome PS-512 119.3ha (60% = 71.58ha) 2864 dwellings</p>	<p>Subset of site PS-607, which has been considered in the above assessment.</p>
<p>Land to the east of Napsbury Lane SA-514 13.9ha (60% = 8.34ha) 334 dwellings</p>	<p>Site not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>Land on the west side of House Lane, Jersey Farm, St Albans S-526 10.1ha (60% = 6.06ha) 242.4 dwellings</p>	<p>Subset of site S-613, which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.</p>
<p>Oaklands College, Smallford SM-528 143.1ha (60% = 85.86ha) 3435 dwellings SADC estimate: 1000 dwellings</p>	<p>Subset of site SM-626, which has been considered in the above assessment.</p>
<p>Harper Green Garden Village LC-539 140.7ha (60% = 84.42ha) 3377 dwellings</p>	<p>Subset of site LC-622, which has been considered in the above assessment. The site straddles the boundary of St Albans District with Hertsmere Borough. The portion of site within St Albans District is not of a strategic scale, particularly given the existing uses. The site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land and therefore does not meet threshold for this assessment. The site is to be considered further in liaison with Hertsmere BC as appropriate.</p>
<p>Land at Harperbury Hospital, Harper</p>	<p>Subset of site LC-622, which has been considered in the above assessment. In isolation the site is not capable of</p>

Lane, Shenley LC-540 10.9ha (60% = 6.54ha) 262 dwellings	accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
Land Adjacent All Saints Pastoral Centre and Barley Mow Farm LC-546 28ha (60% = 16.8ha) 672 dwellings	Subset of LC-621, which has been considered in the above assessment.
Parcel A & Parcel B HSBC Training and Management Centre, Smug Oak Lane BW-553 12ha (60% = 7.2ha) 288 dwellings	Site not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land. Parcel B overlaps BW-556, which has been considered in the above assessment.
Land West of Redbourn, adjacent to Stephens Way R-571 13ha (60% = 7.8ha) 312 dwellings	Site not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
East and West Parcels Land north of Hemel Hempstead Road (B487) OS-576 35.4ha (60% = 21.24ha) 850 dwellings	Subset of OS-602, which has been considered in the above assessment.
Land at Ambrose Lane H-579 11.4ha (60% = 6.84ha) 274 dwellings	Subset of OS-595, which has been considered in the above assessment.
Land south of Wheathampstead Road H-586 13.1ha (60% = 7.86ha) 315 dwellings	Subset of site H-611, which has been considered in the above assessment. In isolation the site is not capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land.
Land adjoining Tippendell Lane, Park Street PS-587 10.8ha (60% = 6.48ha) 260 dwellings	Subset of OS-624, which has been considered in the above assessment.
Rothamsted Research Core Site Russell/North Buildings and Hatching Green H-593 14ha (60% = 8.4ha) 336 dwellings	This is part of the wider Rothamsted Research site, which is an important asset within the District and which is being retained. Although the size is 14ha, this includes part of the core area of Rothamsted Research and the land for consideration is therefore smaller and falls below the thresholds of a minimum of circa 500 dwellings or 14 hectares of developable land.



Strategic Sites Selection Process 2018 - District Map

Key

- ↗ Strategic Site Boundary
- ↙ SADC District Boundary



Appendix 2: Representative Site Photographs

Site R-551 North East Redbourn



OS-400C East Hemel Hempstead (South)



OS-400d South East Hemel Hempstead



OS-400a East Hemel Hempstead (North)



OS-602 North Hemel Hempstead



H-595 Land at North West Harpenden



H-583 Land at North East Harpenden



SA-605 North St Albans



SM-626 Oaklands College



LC-621 Land West of London Colney



CG-561 Land at Chiswell Green



Lawes Agricultural Trust

St Albans City and District Council

Green Belt Review

October 2018

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CONTENTS

1.0	Introduction	1
2.0	Green Belt Policy	1
3.0	Commentary on the 'Green Belt Review: Purposes Assessment' (Part 1)	1
4.0	Commentary on the 'Green Belt Review: Sites and Boundaries Study' (Part 2) ..	2
5.0	Commentary on the 'Draft Strategic Site Evaluation'	3
6.0	Green Belt Strategic Sites Assessment	5
7.0	Detailed Assessment of Strategic Site R-551 Land north east of Redbourn	21
8.0	Conclusion	24

Tables

- 1: St Albans City and District Council Strategic Site Evaluations Comparisons
- 2: To Check the Unrestricted Sprawl of Large Built up Areas
- 3: To Assist in Safeguarding the Countryside from Encroachment
- 4: Further Detailed Assessment of R-551 – Land North East of Redbourn
- 5: Sites Overall Landscape Sensitivity to Sprawl Rankings
- 6: Sites Overall Landscape Sensitivity to Encroachment Rankings

Appendices

- 1: St Albans City and District Council – Site Plans and Photographs
- 2: Detailed Assessment – Plans and Photographs for Strategic Site R-551 North East Redbourn

1.0 INTRODUCTION

1.0.1 This Green Belt Review (GBR) has been prepared on behalf of the Lawes Agricultural Trust. It provides part of a detailed assessment of 12 Sites within St Albans City and District (SACD) and considers whether the land should be removed from the Green Belt. This report is to read in conjunction with the following report: Green Belt Review, St Albans City and District Council, Prepared on Behalf of The Lawes Agricultural Trust. September 2018. Prepared by Arrow Planning Ltd.

1.0.2 The above is the lead report with this report focusing on the impartial assessment of each of the 12 Sites against two of the Green Belt purposes; a separate evaluation of urban sprawl (purpose a)) and safeguarding of the countryside from encroachment (purpose c)).

1.0.3 As part of this process; and included within this report is a more detailed landscape analysis of Land north-east of Redbourn (the Site), with specific focus on the contribution that this site makes towards Green Belt purposes.

1.0.4 The Site occupies a parcel of land immediately adjacent to the north-east of Redbourn, located within St Albans District. The Site is bound to the south by Harpenden Lane, to the west by Dunstable Road and to the north-east by A5183. It is situated within land designated as part of the wider Metropolitan Green Belt.

1.0.5 A series of two independent studies have previously been undertaken at the multiple-district and district level to review the Green Belt; and assess how different areas contribute towards Green Belt functions. These comprise:

- Green Belt Review Purposes Assessment – Prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council (Sinclair Knight Merz, November 2013).
- Green Belt Review Sites and Boundaries Study – Prepared for St Albans City and District (Sinclair Knight Merz, February 2014).

1.0.6 St Albans District Council is in the process of developing a new local plan. A ‘Call for Sites’ was run in January - February 2018. 70 draft strategic sites were identified, including R-551 Land north east of Redbourn (the Site). The strategic sites were subsequently evaluated by the council, part of which included a Green Belt Review Evaluation and ‘Red, Amber, Green’ rating.

1.0.7 This review considers the findings of the multiple-district and district level studies, in relation to the 12 Sites and Green Belt purpose. An analysis of how the 12 Sites contributes towards the two landscape related purposes of the Green Belt is undertaken and for each, a red, amber and green rating given following the Green Belt Review Evaluation methodology.

2.0 GREEN BELT POLICY

2.0.1 The National Planning Policy Framework (Ministry of Housing, Communities and Local Government, July 2018) states that (Paragraph 133):

“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

2.0.2 Five purposes of Green Belt are identified (Paragraph 134):

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

2.0.3 This review focuses on aspects of Green Belt relating to landscape matters, and therefore considers purposes a) urban sprawl and c) safeguarding the countryside from encroachment, only.

2.0.4 Whilst landscape analysis forms part of understanding the function of land within Green Belt, it is noted however that Green Belt is not a landscape designation per se. The Landscape Institute state in the ‘Green Belt Policy: Landscape Briefing Note’ (Landscape Institute, April 2018):

“Green Belt is a spatial planning tool, not a designation that provides landscape protection. Current Green Belt policy does not require Green Belt to be of high landscape quality or even particularly attractive. Different legislation exists to protect landscapes of value and natural beauty such as National Parks, Areas of Outstanding Natural Beauty (AONBs), and local designations such as Special Landscape Areas (SLAs) or equivalent.”

3.0 COMMENTARY ON THE ‘GREEN BELT REVIEW: PURPOSES ASSESSMENT’ (PART I)

3.0.1 The ‘Green Belt Review: Purposes Assessment’ (Part I Study) was undertaken in 2013 by Sinclair Knight Merz for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council. The study provides a strategic level review of the Green Belt across all three districts. The purpose of the study was to assess the “various functions of different areas of the Green Belt”, and identify

areas of Green Belt land which are considered to contribute least towards national purposes. Green Belt land across each of the three districts was sub-divided into strategic parcels, which were then assessed for how far they contributed towards Green Belt purposes.

3.0.2 66 strategic parcels were identified across the three districts. The study applies a defined assessment to each “strategic parcel”. For each of the four Green Belt purposes (the fifth national purpose relating to urban regeneration was not assessed) and an identified Hertfordshire purpose to “*maintain existing settlement pattern*”, a series of questions were asked. In response a short, written assessment is provided, and the contribution the strategic parcel makes to each Green Belt purpose classified as either:

- significant contribution to GB purpose;
- partial contribution to GB purpose; or
- limited or no contribution to GB purpose.

3.0.3 Resulting from the assessment, the study identifies areas of land that contribute least towards Green Belt purposes. Within St Albans City and District 8 strategic sub-areas and 8 small scale sub-areas are identified, which are recommended for further detailed assessment. However, overall ratings for the contribution each strategic parcel makes to each of the five GB purposes is not given, as it is stated that:

“An overall assessment of the contribution the parcel makes to the Green Belt has been provided as a written evaluation only. There has been no overall classification at this point as this is considered too crude to capture the inter-relationship between performance against all the purposes.”

3.0.4 The Site is located within a strategic parcel identified as GB20 – Green Belt Land to West of Harpenden, which it is stated “*is defined to allow consideration of the gap separating Harpenden and surrounding settlements including Luton and Dunstable (to the north of the study area) and Redbourn*”. GB20 is 1,150 ha and it extends from the edge of Redbourn north to the edge of Harpenden and north-west between the M1 and the A1081. The Site is approximately 42 ha and situated within the southern corner of GB20 adjacent to Redbourn; it constitutes a small part of the overall area that was assessed, less than 4%.

3.0.5 The assessment finds that GB20 provides a **significant** contribution to purpose a) *to check the unrestricted sprawl of large built-up areas*, stating that “*the parcel is located south of Luton and Dunstable and forms a strong connection with a wider network of parcels to the north to restrict sprawl*”.

3.0.6 A **partial** contribution is assessed for purpose c) *to assist in safeguarding the countryside from encroachment*. It is stated that “*the parcel displays a wide mix of urban fringe and rural and countryside characteristics*”.

3.0.7 One small scale sub-area that contributes least towards Green Belt purposes is identified within GB20 at the western edge of Harpenden. The Site is not identified as either a strategic sub-area or small scale sub-area for further analysis.

3.0.8 The Green Belt review takes a high-level strategic scale approach; however the nature of such an approach may mean that local landscape features, and variation in character are overlooked. As noted above, the Site comprises a very small portion of the overall strategic parcel GB20, located adjacent to an existing urban edge. In assessing how a strategic parcel may act to restrict sprawl, the Green Belt review considers whether the parcel itself acts as a barrier. However, when considering containment of sprawl at the scale of the Site, consideration also needs to be given to the presence of local topographic, vegetative and other built features that may act as barriers. Similarly, in the assessment of encroachment upon the countryside, it is noted that there is a wide range in the urban and rural characteristics of the strategic parcel GB20, and the overall rating that was given needed to capture this variation. However, to consider encroachment at the scale of the Site, the local landscape character needs to be understood in more detail.

3.0.9 This local site level analysis is therefore provided in Section 6 of this report.

4.0 COMMENTARY ON THE ‘GREEN BELT REVIEW: SITES AND BOUNDARIES STUDY’ (PART 2)

4.0.1 The ‘Green Belt Review: Sites and Boundaries Study’ was undertaken in 2014 by Sinclair Knight Merz for St Albans City and District Council. The study provides a more detailed assessment of certain Green Belt areas within St Albans City and District. The areas included within the study are the 8 strategic sub-areas identified within the ‘Green Belt Review: Purposes Assessment’ (Part 1 Study), as contributing least towards Green Belt purposes. The 8 small scale sub-areas within St Albans City and District also identified within the Part 1 study were not included for further analysis in the Part 2 study.

4.0.2 The area of GB20 in which the Site is situated, was not identified as a strategic sub-area in Part 1 of the Green Belt Study. It was therefore not included for more detailed assessment in the Part 2.

4.0.3 The objectives of the Part 2 study were to:

- “*Identify potential sites (with boundary lines) within the strategic sub-areas (identified in the Part 1 study) for potential release from the Green Belt for future development;*
- *Estimate the potential development capacity of each site; and,*
- *Rank the sites in terms of their suitability for potential Green Belt release.”*

4.0.4 The study comprises a three-stage approach, these are summarised in Table 2.2 (p. 4) of the report, which is reproduced below.

Approach	Description of Task
STAGE 1 – Sub-area Assessment	Assessment of sub-area only
Task 1a: Review of Contribution towards Green Belt Purposes and review of relevant Planning History	Summarises key findings of Part I Study to explain why sub-area contributes least towards Green Belt purposes. Considers relevant planning history including planning applications and policy.
Task 1b: Assessment of Environmental and Historic Constraints; Integration and Landscape Appraisal / Sensitivity	Desk-based and on-site assessment of Environmental and Historic Constraints; Integration (sustainable patterns of development) and Landscape Appraisal and Sensitivity.
STAGE 2 –Site Assessment	Assessment of site only (identified using key findings from Sub-area assessment).
Task 2a: Boundary Review and contribution to Green Belt purposes	Assessment of boundary characteristics including strength of boundaries to define the sites. Summary of contribution towards Green Belt purposes of site only.
Task 2b: Assessment of Developable Areas	Summary of rationale for illustrative site layout including proposed landscape mitigation measures (if required).
Task 2c: Indicative Development Capacity	Estimation of residential development capacity based on net residential density assumptions ranging from 30 to 50 dwellings per hectare (dph). ²
STAGE 3 –Site Classification	Classification of sites.
Task 3a: Evaluation of site suitability for potential Green Belt release and future development	Based upon assessment findings, each site is ranked and evaluated in terms of its suitability for potential Green Belt release for future development.

4.0.5 Stage 1 is carried out for each strategic sub-area, after summarising the results of the Part I study, environmental and historical constraints within the area are identified. Integration to existing urban areas is considered, from the perspective of sustainable development, in particular accessibility to local services and facilities including town and local centres, public transport, schools and public open space. A landscape appraisal is also conducted of the sub-area, which considers landscape character, views and landscape sensitivity.

4.0.6 Stage 2 is carried out for a site area defined within the wider strategic sub-area, based on the findings from the Stage 1. The boundaries of the site are reviewed and the contribution the site itself makes towards the Green Belt reviewed. An indicative layout for the site is provided, showing areas for potential urban

development, retained landscape features and proposed landscape mitigation. An estimate is made for the development capacity of the site.

4.0.7 Stage 3 ranks each of the identified sites according to their suitability for potential Green Belt release and future development. Four equally weighted assessment categories are used: Contribution towards the five Green Belt purposes; Environmental and historic constraints; Integration with existing urban areas; and Landscape sensitivity.

5.0 COMMENTARY ON THE 'DRAFT STRATEGIC SITE EVALUATION'

5.0.1 In May 2018 St Albans City and District Council undertook an evaluation of the 70 draft strategic sites identified through the 'call for sites'. The first stage of the evaluation comprised a 'Green Belt Review evaluation'. This is generally based on the results of the Sinclair Knight Merz 2013 Green Belt Review, from which the council have deduced an overall red, amber or green rating for each strategic site. In deciding the rating, it is unclear how much further detailed site specific analysis was undertaken, and the what criteria was used for the red, amber, green rating.

5.0.2 **Table I** provides a comparison of the St Albans Council Strategic Sites, the areas assessed within Parts 1 and 2 of the Sinclair Knight Merz Green Belt Review, and the St Albans Council Strategic Site Evaluation.

TABLE 1: ST ALBANS CITY AND DISTRICT COUNCIL STRATEGIC SITE EVALUATIONS COMPARISONS

Showing comparison of the St Albans Council Strategic Sites, the areas assessed within Parts 1 and 2 of the Sinclair Knight Merz Green Belt Review, and the St Albans Council Strategic Site Evaluation.

St Albans City and District Council Strategic Site	Green Belt Review Purposes Assessment Strategic Parcel	Identified as a strategic sub-area or small scale sub-area for land contributing least towards Green Belt purposes?	Local Plan – Draft Strategic Sites Selection Green Belt Review evaluation (RAG)	Local Plan – Draft Strategic Sites Selection Overall evaluation (RAG)
R-551 North East of Redbourn	Small south-western section of GB20	No	Amber	Amber
OS-400c East Hemel Hempstead (South)	Central part of GB24A	SA-S2	Green	Green
OS-400d South East Hemel Hempstead	Southern part of GB24A and very small part of GB15	North-west part of Site within SA-S2	Amber	Amber
OS-400a East Hemel Hempstead (North)	Most of GB21A	SA-S1	Green	Green
OS-602 North Hemel Hempstead	Part of eastern section of GB16B	No	Amber	Amber
H-595 Land at North West Harpenden	Small western part of GB40	SA-S5	Green	Green
H-583 Land at North East Harpenden	Central southern part of GB40	SA-S6	Green	Green
SA-605 North St Albans	Southern part of GB38	SA-S4	Green	Green
SM-626 Oaklands College, Smallford (East St Albans)	South western part of GB36	Part of the Site within SA-S3	Green	Green
LC-621 Land west of London Colney	Northern half of GB31	SA-S7	Green	Green
PS-607 Former Radlett Aerodrome	Central portion of GB30	No	Amber	Amber
CG-561 Land at Chiswell Green	Small eastern part of GB25	SA-S8	Green	Green

6.0 GREEN BELT STRATEGIC SITES ASSESSMENT

- 6.0.1 This study has conducted a landscape assessment for the 12 St Albans Council strategic sites (22 May 2018 LPA paper), which were given an overall evaluation of amber or green, including land north-east of Redbourn.
- 6.0.2 The analysis considers the two landscape related purposes of green belt, at the local level of the sites within their immediate context. Two chartered landscape architects from Nicholas Pearson Associates undertook a site visit in August 2018 to all but one of the 12 strategic sites (site PS-607 Former Radlett Aerodrome due to lack of public access). The site visits did not include visiting all parts of the 11 sites but it did include viewing the sites local publicly accessible roads adjacent to the sites and from a number of PROWs within the sites. Representative photographs were taken of the sites. This was backed up by a desk top analysis and use of recent aerial photography to assess the sites. A more detailed site visit of the site and local context and photographic record was undertaken for site R-551 - Land north east of Redbourn.
- 6.0.3 The first part of the assessment relates to purpose *a) to check the unrestricted sprawl of large built-up areas*. Particular consideration is given to the existing edge of settlement, boundaries of each site, and topography, natural and built features of each site. An overall evaluation is given of the extent to which each site could act to contain any future development. An assessment for each site is set out in **Table 2**.
- 6.0.4 The second part of the assessment relates to purpose *c) to assist in safeguarding the countryside from encroachment*. The Hertfordshire Landscape Character Assessment is reviewed to provide an understanding of the locally defined character areas, and their overall condition. Whilst this assessment includes reference to landscape character areas, the assessment undertaken is not based on landscape character. Site level landscape assessment considers land uses, vegetation, rural characteristics and urban elements of each site. An overall evaluation is given of the contribution each site makes towards purpose of safeguarding countryside from encroachment. Analysis for each site is set out in **Table 3**.
- 6.0.5 As fully explained in the lead Green Belt Review prepared by Arrow Planning Ltd, a set of scoring criteria was used for each purpose, with a score out of five given. The NPPF does not place any greater emphasis on one purpose over the other, so each purpose is considered equally significant.
- 6.0.6 This Scoring Criteria is consistent with that applied elsewhere in other Green Belt Reviews and is a commonly adopted methodology for scoring Green Belt Assessments.
- 6.0.7 Therefore, a planning judgement is required in order to determine whether an assessed Site is, overall, strongly or weakly meeting Green Belt purposes.

6.0.8 The scoring criteria used are as follows as per Arrow Planning Review:

Overall strength of Site against Green Belt Purpose	Score	
	0	Does not meet purpose
	1	Meets purpose very weakly
	2	Meets purpose relatively weakly
	3	Meets purpose
	4	Meets purpose relatively strongly
	5	Meets purpose very strongly

Table 1: Scoring for Site Assessments

TABLE 2: TO CHECK THE UNRESTRICTED SPRAWL OF LARGE BUILT UP AREAS

Strategic Site	Topography	Boundary vegetation within Site	Other boundaries within Site	Surrounding context	Boundaries to the countryside	Boundaries with existing settlement	Overall landscape sensitivity to sprawl (High, Medium, Low)	Contribution towards Green Belt purpose of restricting sprawl of large built-up areas (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
R-55 I Land north east of Redbourn	Land slopes down from west to east, with small valley containing the River Ver running north-south through the eastern part of the Site.	Some field boundary hedgerows, with scattered mature trees, particularly either side of public footpath through Site.	River Ver	Site situated to the north-east of Redbourn. Existing residential areas adjacent to the south-west and south-east of the Site. Residential properties and meadows to the north-west of the Site, golf course to the north, arable and grazed fields to the east.	NE boundary – A5183, major road, no pavement, lighting only at roundabout. Hedgerows and tree belts on either side, with some gaps. NW boundary – hedgerow / tree belts along field boundaries.	SW boundary – Dunstable Road, wide urban road with pavements and street lighting. Hedgerow with occasional mature trees along Site boundary to north-east of road. Residential properties to the south-west of road. Fire station at southern corner of Site. SE boundary – Harpenden Lane. Lighting, pavement along southern-eastern side, with existing properties facing the Site. Hedgerow along Site boundary to the north-west of the road.	Low	Limited	1
OS-400c East Hemel Hempstead (South)	Gently undulating ground, rising from low point within centre of Site to the north-east and to the south-west	Hedgerows with some gaps and sections removed. Hedgerow trees and some mature boundary trees.	-	Site situated adjacent to eastern edge of Hemel Hempstead. Edge of residential areas, with housing arranged in cul-de-sacs, including some recent development. Breakspear Park to north-west including four storey office building and a hotel. M1 and A414 junction and corridor to the north and east. Arable fields to south-east.	NE boundary – embankment to the M1, A414 and junction, tree and shrub planting establishing, limited views beyond. SE boundary - sub-divides a field and does not follow an existing boundary.	SW boundary – Westwick Row has a rural lane character. Housing to the south-west of this is set back from road, and behind hedgerows. Partial / limited visual connection between existing urban edge and Site. NW boundary – Green Lane with strong hedgerows either side, has a rural lane character.	Medium	Partial	3

Strategic Site	Topography	Boundary vegetation within Site	Other boundaries within Site	Surrounding context	Boundaries to the countryside	Boundaries with existing settlement	Overall landscape sensitivity to sprawl (High, Medium, Low)	Contribution towards Green Belt purpose of restricting sprawl of large built-up areas (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
OS-400d South East Hemel Hempstead	Plateau at eastern part of Site, with land sloping down to the north and west. Plateau at eastern part of Site, with land sloping down to the north and west.	Hedgerows, some well treed and some isolated mature boundary trees.	Westwick Row, rural lane, runs NW-SE through Site.	Hemel Hempstead to the west, however Site only adjoins edge of urban area along part of north-western boundary, where there is the residential area at Leverstock Green. Arable and grazed fields to the north-west and south, golf course to the south-east. M1 and A414 corridor to the north-east.	NW boundary (to north) – sub-divides a field and does not follow an existing boundary. NE boundary – embankment to the M1 and A414, tree and shrub planting establishing, limited views beyond. S boundary - A4147, major road, although no urban influences of lighting or pavement. Pimlico, rural lane, and Bedmond Road, substantial tree and hedgerow vegetation either side.	NW boundary (to south) – backs of gardens to existing houses at Leverstock Green face Site. Some mature trees along boundary, which filter views. However, some views of the existing urban edge from western part of the Site.	High	Significant	5
OS-400a East Hemel Hempstead (North)	Land slopes down from the south to a small valley, and cutting which contained the former Nickey Line railway.	Hedgerows, some containing a number of mature trees, woodland belts, vegetation along the Nickey Line.	Former Nickey Line railway, now a long distance path	Site situated to the north-east of Hemel Hempstead. Only a small part of the western boundary of the Site meets the existing residential edge. A parcel of arable fields is situated between the Site and residential / industrial areas at the eastern edge of Hemel Hempstead. Warehouses and oil storage depot to the south of the Site. Arable fields to north, south, and east beyond the M1.	N boundary – Hemel Hempstead Road, B487, no urban influences of lighting or pavement. Hedgerows with some mature trees along road verge boundary with Site. Nickey Line with strong tree line either side. E boundary – M1 motorway with some tree and shrub planting on the verge.	S boundary – Punchbowl Lane – narrow rural lane with tall hedgerows either side. W boundary – Cherry Trees Lane, road with a generally rural character, although pavement along the eastern side. Substantial hedgerows / tree line.	Medium	Partial	3

Strategic Site	Topography	Boundary vegetation within Site	Other boundaries within Site	Surrounding context	Boundaries to the countryside	Boundaries with existing settlement	Overall landscape sensitivity to sprawl (High, Medium, Low)	Contribution towards Green Belt purpose of restricting sprawl of large built-up areas (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
OS-602 North Hemel Hempstead	Land broadly slopes down from north-west to south-east.	Hedgerows along some field boundaries, some containing a number of mature trees.	Lane running NE-SW through the Site.	Site situated to the north-east of Hemel Hempstead. Only part of the western boundary of the Site meets the existing residential edge. Arable farmland to the north, east and south of the Site.	SW boundary (to north) – Holtsmere End Lane, rural single track lane, with hedgerows and tree belts either side. NW boundary – Holtsmere End Lane, rural single track lane, some sections of hedgerows, some fenced sections. Properties at Holtsmere End. Field boundary with scattered mature trees. NE boundary – generally follows field boundaries with hedgerows and mature trees. Some sections of the boundary cut across existing fields and do not follow existing features. SE boundary - Hemel Hempstead Road, B487, no urban influences of lighting or pavement. Post and rail fencing along Site boundary, with various sections of hedgerow.	SW boundary (to south) - Holtsmere End Lane, rural single track lane, with hedgerows and tree belts either side. Housing and school to the south-west of lane, however limited glimpsed views of this from the Site, due to intervening vegetation. Only part of the south-western boundary of the Site meets the existing edge of settlement. All other boundaries are to the countryside.	High	Significant	5
H-595 Land at North West Harpenden	Land slopes down from north-east to south-west. The Site slopes towards the existing settlement of Harpenden, such that development would be contained on the valley side, and limited from the plateau top.	Partial sections of hedgerow along Cooters End Lane.	Cooters End Lane subdivides the Site SW-NE	Site situated adjacent to northern edge of Harpenden, with south-western and south-eastern Site boundaries meeting the existing residential edge. Arable fields to the north-west, school and hospital to the north-east.	NW boundary – cuts across a field and does not follow an existing boundary. NE boundary – Ambrose Lane. Pavement and lighting between school and edge of Harpenden.	SW boundary – Luton Road (A1081). Main road through Harpenden, lighting, pavement on south-western side. Hedgerow on north-eastern side of road along Site boundary – some gaps provide views into and out of the Site. SE boundary – back gardens of houses along Bloomfield Road.	Medium	Partial	3

Strategic Site	Topography	Boundary vegetation within Site	Other boundaries within Site	Surrounding context	Boundaries to the countryside	Boundaries with existing settlement	Overall landscape sensitivity to sprawl (High, Medium, Low)	Contribution towards Green Belt purpose of restricting sprawl of large built-up areas (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
<p>H-583</p> <p>Land at North East Harpenden</p>	<p>Western part of Site slopes down broadly from east to west.</p> <p>Eastern part of Site comprises a small valley sloping down from north-west to south-east.</p>	<p>Hedgerows and tree belts, and isolated trees along some field boundaries.</p>	<p>Post and rail fencing sub-dividing paddocks. Farm track running east – west through Site.</p>	<p>Site situated adjacent to north-east of Harpenden. Residential area including houses, school and allotments to the south.</p> <p>Arable and grazed fields, and woodland areas to the north. Cul-de-sac of residential properties at Sauncey Wood to east of the Site.</p>	<p>W boundary – Bower Heath Lane – rural lane, hedgerows either side</p> <p>N boundary – follows field boundaries. Mostly dense hedgerows / tree lines, apart from short section at the east, which is open</p> <p>E boundary – Common Lane, rural lane with woodland and hedgerows along north-eastern edge. Hedgerows along south-western edge of road / Site boundary, except for adjacent to south-eastern field of Site (post and wire fence).</p>	<p>S boundary – follows angular edge of existing residential area; sides of houses, back gardens, edge of playing field and part of Lower Luton Road meet Site boundary.</p> <p>The existing urban edge does not interface well with the countryside, there is opportunity for this edge to be improved.</p>	<p>Low</p>	<p>Limited</p>	<p>1</p>
<p>SA-605</p> <p>North St Albans</p>	<p>Land slopes down from north-west to east. Broad shallow valley in eastern part of Site.</p>	<p>Hedgerows with some mature trees.</p>	<p>Sandridgebury Lane running SW to E through Site</p>	<p>Site situated adjacent to northern edge of St Albans. School and industrial estate to the south of the Site. Linear residential development along Harpenden Road (A1081) to the west of the Site.</p> <p>Rugby ground and arable fields to the north. Railway running along eastern boundary, with arable fields beyond.</p>	<p>E boundary – railway line on embankment, some mature trees on embankment slope</p> <p>N boundary – eastern section defined by recently planted woodland belts along field boundaries; the western section follows an internal road within the rugby ground, dividing a southern area of pitches from the main area of pitches to the north.</p>	<p>W boundary – Harpenden Road – main road into St Albans with pavements and street lighting; back gardens of properties along the road.</p> <p>S boundary – sections of Sandridgebury Lane and Valley Road – rural lanes, no lighting or pavements. Woodland belt.</p>	<p>Medium</p>	<p>Partial</p>	<p>3</p>

Strategic Site	Topography	Boundary vegetation within Site	Other boundaries within Site	Surrounding context	Boundaries to the countryside	Boundaries with existing settlement	Overall landscape sensitivity to sprawl (High, Medium, Low)	Contribution towards Green Belt purpose of restricting sprawl of large built-up areas (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
<p>SM-626</p> <p>Oaklands College, Smallford (East St Albans)</p>	Gently undulating land, with a general slight slope from west to east.	Woodland belts and copses. Boundary hedgerows and trees at edges of some fields.	Post and wire fencing around grazed fields. North, South and East Drives to Oaklands College. Stream in eastern part of Site.	<p>Site situated to east of St Albans. Suburban areas the north-west, west and south-west of the Site. Retail park to south, and plant nursery to south-east. Some linear settlement along Oaklands Lane to the east.</p> <p>Woodland, arable fields and sand and gravel quarry to the north-east.</p>	<p>NE boundary – follows section of Sandpit Lane, field boundaries and perimeter of woodland area</p>	<p>N boundary – Sandpit Lane. Lighting, pavement along southern side, with existing properties set behind verges containing trees. Intermittent hedgerows along Site boundary.</p> <p>E boundary – Oaklands Lane. Substantial hedgerows / tree belts along Site boundary. Properties along north-east of road, limited visibility of these from Site.</p> <p>S boundary – Hatfield Road (A1057) – main road into St Albans, pavements, street lighting. Plant nursery, retail park and residential properties along road.</p> <p>W boundary – follows edges of school grounds and existing edge of residential area.</p>	Low	Limited	1
<p>LC-621</p> <p>Land west of London Colney</p>	Broadly level Site. Valley of River Colne from east to south of Site.	Copses within south-eastern part of area, some field boundary hedgerows.	River Colne from east to south of Site. Farm tracks (one containing bridleway)	<p>Site situated to south-west of London Colney. Napsbury Park former hospital, redeveloped as a housing estate to the north, settlement of London Colney adjacent to the north-east.</p> <p>Former Radlett aerodrome to west, beyond railway line. M25 to south.</p>	<p>E boundary – Shenley Lane, substantial tree belts either side</p> <p>S boundary – M25 motorway, partly within cutting and partly on embankment</p> <p>W boundary – partly follows tree lined field boundaries, and partly follows railway line</p>	<p>N boundary – Hedgerows, tree belts and post and rail fencing, with sports pitches and open spaces at Napsbury Park beyond.</p> <p>NE boundary – Shenley Lane. Lighting, pavement along north-eastern side, with properties facing the Site. Intermittent hedgerows along Site boundary.</p>	Medium	Partial	3

Strategic Site	Topography	Boundary vegetation within Site	Other boundaries within Site	Surrounding context	Boundaries to the countryside	Boundaries with existing settlement	Overall landscape sensitivity to sprawl (High, Medium, Low)	Contribution towards Green Belt purpose of restricting sprawl of large built-up areas (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
PS-607 Former Radlett Aerodrome	Broadly level central and southern parts of Site. Valley of River Ver in north-west.	Scattered copses / scrubby vegetation in central part of Site. Some hedgerows at field boundaries.	River Ver in north-west of Site.	Site situated to south of St Albans, with the A414 North Orbital and a golf course separating the Site from the existing edge of residential areas. Linear development along the A5183 to the west of the Site, including an industrial estate and residential properties. Industrial estate beyond the M25 to the south of the Site. Arable fields and Napsbury Park housing estate to the east of the Site, beyond railway.	E boundary – railway line, with adjacent tree lines and woodland blocks	W boundary – backs of existing development along Park Street / Frogmore / Radlett Road; railway line at north-western corner with adjacent tree belts S boundary – M25 motorway within cutting N boundary – A414 dual carriageway, partly within cutting and on embankment. Tree belts along Site boundary	Low	Limited	1
CG-561 Land at Chiswell Green	Land gently slopes down from north-west to south-east.	Some hedgerows with mature trees.	Post and rail fencing around paddocks.	Site situated to west of Chiswell Green. Residential areas within Chiswell Green adjacent to the east of the Site. Mixed farmland to the south-west of the Site. Former 'Garden of the Rose' visitor attraction and car park to the west.	W boundary – Miriam Lane, grass verges, traffic calming islands, tree belts and post and wire deer fence along Site boundary. Visitor attraction car park to the north-west.	E boundary – back garden boundaries from properties at Chiswell Green meet edge of Site.	Low	Limited	1

TABLE 3: TO ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT

* Source: Hertfordshire Landscape Character Assessment (<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/landscape/landscape-character-assessment.aspx>)

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
R-55 I Land north east of Redbourn	96: Upper Ver Valley <ul style="list-style-type: none"> narrow strip of wetland habitats along valley floor south of Redbourn cultural pattern and historic settlements follows the line of the river open, gently undulating valley slopes large arable fields discrete woodland blocks to north of the area, including conifers isolated settlement lack of field boundaries on valley slopes hedge banks along lanes crossing slopes mature willow and poplar plantations in the floodplain pockets of pasture along urban edges and the dry valley between Redbourn and Hemel Hempstead 	Good condition / Moderate character	Arable fields, meadows, use for agricultural research by Rothamsted	Field boundary hedgerows and mature trees.	Arable fields, River Ver and valley	Built development to the south and west of the Site.	Fire station adjacent to southern corner of Site. Existing settlement adjacent to southern and western edges of the Site.	Footpath broadly north – south through Site.	The eastern portion of the Site exhibits rural characteristics, with the arable fields, meadow and valley of the River Ver. There are some views out towards the elevated countryside to the east. There are also urban influences upon the Site. Urbanised roads with streetlighting and pavements, and the A5183 surround the Site. There is some visual influence of the existing settlement, particularly in southern and western parts of the Site.	Low-Medium	Partial	2

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
OS-400c East Hemel Hempstead (South)	94: Buncefield Plateau <ul style="list-style-type: none"> • arable farmland • upland and dry valleys • M1 transport corridor • discontinuous cultural and field patterns • commercial and industrial urban fringe influence • long views • narrow lanes and isolated properties 	Poor condition / Strong character	Arable farmland, one existing dwelling	Field boundary hedgerows (high proportion of elm) and mature trees. Tree and shrub planting establishing on motorway verge.	Arable fields, fairly intact field pattern and hedgerows	Influence of road corridor of M1 and A414 to north-east including embankment, gantries and lighting. Associated noise and traffic.	Overhead lines and poles across the Site. Limited influence of adjacent settlement upon Site.	Public footpath running SW to NE through Site	The area has minimal urban influences, due to rural lanes and hedgerows providing separation and limiting views of the adjacent settlement and business park. Whilst there is some noise and visual influence from the M1 motorway, the overall character of the area is of a rural farmed landscape.	Medium-High	Significant	4
OS-400d South East Hemel Hempstead	10: St Stephens Plateau (southern part of Site) <ul style="list-style-type: none"> • undulating plateau to north, gently sloping to south east • medium/large open arable fields throughout • visually interlocking mixed woodlands to north • significant extent of motorways and interchanges with associated earthworks, lights and traffic • narrow winding lanes with sparse clipped hedgerows • built edge of urban settlements to east • dispersed settlement with scattered farmsteads 	Moderate condition / Poor character	Arable farmland, grazing land and Westwick Row Farm buildings	Field boundary hedgerows and mature trees. Small woodland block within central part of Site. Tree and shrub planting establishing on motorway verge.	Arable and grazed fields, with fairly intact field pattern, although some hedgerow loss to the east. Farm buildings	Influence of road corridor of M1 and A414 to north-east including embankment, gantries and lighting. Associated noise and traffic.	Influence of adjacent settlement limited to south-western edge of Site.	None through the Site	Urban influence limited to south-western edge of area. Whilst there is some noise and visual influence from the M1 motorway, the overall character of the area is of a rural farmed landscape.	Medium-High	Significant	4

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
	<p>94: Buncefield Plateau (northern part of Site)</p> <ul style="list-style-type: none"> • arable farmland • upland and dry valleys • M1 transport corridor • discontinuous cultural and field patterns • commercial and industrial urban fringe influence • long views <p>narrow lanes and isolated properties</p>	Poor condition / Strong character										
<p>OS-400a</p> <p>East Hemel Hempstead (North)</p>	<p>96: Upper Ver Valley (northern part of Site)</p> <ul style="list-style-type: none"> • narrow strip of wetland habitats along valley floor south of Redbourn • cultural pattern and historic settlements follows the line of the river • open, gently undulating valley slopes • large arable fields • discrete woodland blocks to north of the area, including conifers • isolated settlement • lack of field boundaries on valley slopes • hedge banks along lanes crossing slopes • mature willow and poplar plantations in the floodplain • pockets of pasture along urban edges and the dry valley between Redbourn and Hemel Hempstead 	Good condition / Moderate character	Arable farmland, farm buildings and few isolated residential dwellings	Field boundary hedgerows and mature trees. Two small woodland blocks in north and south of Site. Trees and vegetation along the Nickey Line.	Arable fields and farm buildings. Fairly intact field pattern, although some hedgerow loss.	Influence of road corridor of M1 and A414 to east. Associated noise and traffic.	Overhead lines, poles and pylons across the Site. Adjacent warehouses and oil storage depot to south-west. With exception of small north-western portion of area, no connection to the existing settlement.	Public footpath along north-west edge of Site. Nickey Line long distance path along northern edge of Site.	Some urban / industrial influences upon southern part of Site, from adjacent warehouses, motorway and pylons within Site. More intact rural character towards north of area.	Low-Medium	Partial	2

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
	94: Buncefield Plateau (southern part of Site) <ul style="list-style-type: none"> • arable farmland • upland and dry valleys • M1 transport corridor • discontinuous cultural and field patterns • commercial and industrial urban fringe influence • long views • narrow lanes and isolated properties 	Poor condition / Strong character										

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
OS-602 North Hemel Hempstead	<p>95: Revel End Plateau (northern part of Site)</p> <ul style="list-style-type: none"> arable farmland discrete woodlands and plantations urban fringe recreation M1 transport corridor urban fringe land uses including pasture isolated farmsteads field copses <p>96: Upper Ver Valley (southern part of Site)</p> <ul style="list-style-type: none"> narrow strip of wetland habitats along valley floor south of Redbourn cultural pattern and historic settlements follows the line of the river open, gently undulating valley slopes large arable fields discrete woodland blocks to north of the area, including conifers isolated settlement lack of field boundaries on valley slopes hedge banks along lanes crossing slopes mature willow and poplar plantations in the floodplain pockets of pasture along urban edges and the dry valley between Redbourn and Hemel Hempstead 	<p>Moderate condition / Moderate character</p> <p>Good condition / Moderate character</p>	Arable farmland, one existing isolated dwelling, and houses at north of Site at Holtsmere End	Field boundary hedgerows and mature trees.	Arable fields. Some large fields where hedgerows have been removed, causing partial disruption of field pattern.	Built development to the south-west of the Site.	Overhead lines and pylons running NW to SE through Site. Limited influence of adjacent settlement.	Public footpath SW to NE through Site and along part of eastern boundary.	<p>The area has an overall rural character. Some hedgerows have been removed, and the field pattern change. However, there is limited urban influences.</p> <p>A rural lane, hedgerows and tree belt provides separation from and limiting views of the adjacent settlement to the west.</p>	High	Significant	5

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
H-595 Land at North West Harpenden	104: Thrales End Plateau <ul style="list-style-type: none"> relatively narrow plateau area with views to the Lea valley to the north east and Harpenden to the south west large open regular arable fields with infrequent clipped hedgerows sparsely settled outside urban area woodland areas to the northern fringes of Harpenden mixed with hospital and institutional/training establishments 	Poor condition / Strong character	Arable farmland, one existing isolated dwelling	Some field boundary hedgerows and mature trees.	Arable fields	Influence of Luton Road A1081 to south-west of Site. Residential edge of Harpenden to south-west. Hospital and school to the north-east.	Clear views of existing residential areas from most parts of the Site.	Chiltern Way long distance path along Cooters End Lane running SW-NE through Site.	Despite the rural land use of the Site itself, the highly visible urban context to the south-west and south-east, gives a Site an overall urban fringe character. The hedgerows surrounding the Site are in mixed conditions, with some gappy sections.	Low	Limited	1
H-583 Land at North East Harpenden	96: Upper Ver Valley (western part of Site) <ul style="list-style-type: none"> narrow strip of wetland habitats along valley floor south of Redbourn cultural pattern and historic settlements follows the line of the river open, gently undulating valley slopes large arable fields discrete woodland blocks to north of the area, including conifers isolated settlement lack of field boundaries on valley slopes hedge banks along lanes crossing slopes mature willow and poplar plantations in the floodplain pockets of pasture along urban edges and the dry valley between Redbourn and Hemel Hempstead 	Good condition / Moderate character	Paddocks and grazed fields, riding school / stables, a few houses along Lower Luton Road	Some field boundary hedgerows and mature trees.	Paddocks and grazed fields, riding school / stables	Built development to the south of the Site.	Communications mast within Site, overhead lines and poles through eastern part of Site.	Two public footpaths one in western and one in eastern part of Site.	Urban fringe character. Clear visual links with the existing areas of settlement, particularly from the eastern and central portions of the Site. Prevalence of post and rail fencing subdividing fields for paddocks. Influence of mast in western part of Site, and overhead wires and poles in the eastern part of Site. Some smaller fields in north-east of Site with established intact hedgerows and mature trees at boundaries, retaining strong character.	Medium	Partial	3

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
	<p>34: Blackmore End Plateau (eastern part of Site)</p> <ul style="list-style-type: none"> • elevated plateau area dominated by large arable fields • smaller pastoral fields closer to villages • linear and discrete woodlands, many ancient, scattered through area • villages with strong vernacular architecture • remote quiet area with few detracting features • historic houses and modest areas of parkland • areas of regenerated common 	Moderate condition / Moderate character										

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
SA-605 North St Albans	I02: Ayres End Valleys and Ridges <ul style="list-style-type: none"> open dry valleys overlooked by smaller areas of plateau on the fringes quiet area with few visual detractors except the A1081 and mainline railway to the west small woods on the upper slopes emphasize the valleys area served by narrow, winding roads lined by dense mixed hedgerows mixed arable, pasture and recreational land uses number of equestrian establishments associated with small country houses, including The Grove and Sandridgebury locally prominent built edges to adjacent settlements isolated properties or small clusters of dwellings, generally with strong vernacular architecture 	Moderate condition / Moderate character	Arable farmland, rugby pitches	Hedgerows with some scattered mature trees. Belt of recent tree planting along northern edge of Site. Belt of ancient woodland adjacent to southern boundary of Site.	Arable fields	Built development to south-west and south-east	Railway line along eastern edge of Site, mast to south of Site.	Public footpath along eastern edge of Site, and through woodland to south of Site.	<p>Central part of the Site exhibits rural characteristics, with rural land uses, and rural lane through area.</p> <p>Some urban influences at the edges of the area, including the railway to the east of the Site, and the floodlit sports pitches and pavilion to the north-west.</p> <p>The belt of ancient woodland along the southern boundary of the Site, provides separation from and limits influence from the adjacent industrial estate.</p>	Low-medium	Partial	2

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
SM-626 Oaklands College, Smallford (East St Albans)	31: De Havilland Plain <ul style="list-style-type: none"> an extensive level plain large open arable landscape to the north on high quality agricultural land disused Hatfield aerodrome with associated industrial and commercial development and aeronautical structures parkland and horticultural landscape of Oaklands College existing and restored mineral workings urban-fringe development and glasshouses incoherent and jumbled landscape, particularly to the south and centre 	Poor condition / Moderate character	Arable and grazed farmland, paddocks, Oaklands College, sports pitches, construction of new houses in north-west of area	Block of ancient woodland along south-western edge of area, small woodland at centre of Site near college complex, woodland belts along eastern edge of area. Some hedgerows at field boundaries.	Arable and grazed fields, paddocks, woodland	Built development to north-west, west and south	Construction work in north-west of area.	Bridleway running north – south through area, and footpath running east - west	North-western part of Site exhibits urban fringe characteristics, some visual links to the existing settlement to the north-west and current construction works within the area. Parkland and horticultural character associated with Oaklands College. Urban fringe character to southern part of Site, influence of Hatfield Road and adjacent residential areas and retail park.	Low-medium	Partial	2

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
<p>LC-621</p> <p>Land west of London Colney</p>	<p>19: Vale of St Albans</p> <ul style="list-style-type: none"> • broad shallow basin varying by only 10m • extensive views along the Vale and up to Shenley Ridge • a predominantly arable landscape with few small or medium copses, and with some grazing on restored land • areas of woodland and parkland to north east in association with Tyttenhanger Park • active and restored mineral extraction Sites along the course of the Colne and at Radlett aerodrome. Mix of wetland restoration and landfill Sites • institutional parkland landscapes associated with redundant Victorian psychiatric hospitals at Napsbury and Harperbury • M25 corridor, overhead pylons and associated urban fringe development • new planting associated with the road corridor and adjacent land uses 	Poor condition / Weak character	Arable and grazed farmland, farmhouses and farm buildings, language school, chapel	Copses within south-eastern part of area, some field boundary hedgerows.	River Colne and valley, arable and grazed fields, copses.	<p>Built development to the north and north-east.</p> <p>Influence of M25. Associated noise and traffic.</p>	Napsbury Park housing estate to north of area, railway adjacent to part of western boundary, M25 along southern boundary of Site.	Bridleway across area from south to east, with two adjoining footpaths	<p>Rural character of south-east of Site, with complex of farm buildings, irregular shaped fields with hedgerows and tree belts and River Colne valley.</p> <p>Urban fringe character of north-west of Site. Large open arable fields, with some views of existing settlement at London Colney to the north-east and the redeveloped Napsbury Park to the north.</p>	Medium	Partial	3

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
PS-607 Former Radlett Aerodrome	I9: Vale of St Albans (central and southern part of Site) <ul style="list-style-type: none"> • broad shallow basin varying by only 10m • extensive views along the Vale and up to Shenley Ridge • a predominantly arable landscape with few small or medium copses, and with some grazing on restored land • areas of woodland and parkland to north east in association with Tyttenhanger Park • active and restored mineral extraction Sites along the course of the Colne and at Radlett aerodrome. Mix of wetland restoration and landfill Sites • institutional parkland landscapes associated with redundant Victorian psychiatric hospitals at Napsbury and Harperbury • M25 corridor, overhead pylons and associated urban fringe development • new planting associated with the road corridor and adjacent land uses 	Poor condition / Weak character	Former Radlett aerodrome, grazed and arable fields, farm buildings,	Woodland blocks / belts at eastern and southern parts of Site. Scattered copses / scrubby vegetation in central part of Site. Some hedgerows at field boundaries.	River Ver and valley through north-west of Site. Grazed fields. Copses	Built development to west of Site. Influence of M25. Associated noise and traffic.	Disruption of field pattern resulting from former airfield use. Strong linear feature of railway along eastern boundary of Site. M25 motorway within a cutting to the south of the Site. A414 along northern boundary of Site.	Ver-Colne Valley Walk long distance path through north-west of Site. Bridleway through north of Site. Short section of footpath along western boundary.	More rural character in north of Site, with River Ver and valley, farm buildings and grazed fields, hedgerows and scattered trees. Central and southern parts of the Site have been affected by the former use as the aerodrome. There is an incoherent structure to the arable and grazed fields, with scrubby vegetation establishing in patches.	Low	Limited	1

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
	<p>I7: Ver / Colne River Valley (northern part of Site)</p> <ul style="list-style-type: none"> well-defined linear river corridor from St Albans to Watford flat sinuous floodplain with ecologically important floodplain meadows steeper valley sides including arable conversions, golf courses and restored land parklands fronting river at Munden Hall and Wall Hall area of restored mineral workings in river floodplain fragmentation of linear valley form and a loss of tranquillity where crossed by the M25, M1 and A414 sense of rural seclusion between Otterspool and Colne/Ver confluence with attractive riverside views visual intrusion from urban fringe development at Watford, Park Street, Colney Street and St Albans 	Moderate condition / moderate character										

Strategic Site	Hertfordshire Landscape Character Area (LCA) and key characteristics *	Condition of LCA / Strength of Character *	Current land uses of Site	Trees, hedgerows, woodland and ancient woodland within Site	Rural characteristics of Site	Urbanising influences to local Site context	Urban characteristics of Site	Public rights of way within Site	Overall condition of countryside character of Site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a Site makes towards purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose 0 - 5
CG-561 Land at Chiswell Green	I0: St Stephens Plateau <ul style="list-style-type: none"> undulating plateau to north, gently sloping to south east medium/large open arable fields throughout visually interlocking mixed woodlands to north significant extent of motorways and interchanges with associated earthworks, lights and traffic narrow winding lanes with sparse clipped hedgerows built edge of urban settlements to east dispersed settlement with scattered farmsteads 	Moderate condition / Weak character	Paddocks, arable farmland	Small woodland block in south-east of Site. Some field boundary hedgerows with a number of mature trees.	Grazed and arable fields, hedgerow boundaries	Built development to east of Site	Views of existing settlement, particularly from eastern and southern parts of the Site.	None	Urban fringe character of Site, influence of adjacent residential areas.	Low	Limited	1

6.0.9 **Appendix I** contains figures for each site, these illustrate the published landscape character areas, topography and significant landscape features of each site.

7.0 DETAILED ASSESSMENT OF STRATEGIC SITE R-551 – LAND NORTH EAST OF REDBOURN

7.0.1 A more detailed assessment based on the criteria given in **Table 2** above has been undertaken for Site R-551 - Land north east of Redbourn. This is set out in **Table 4**. This is further supported in **Appendix 2** by larger scale maps and an aerial photograph of the site with a series of Representative Viewpoints are shown and related photographs from around and within the Site. Figure 1 in **Appendix I** should also be referred to.

TABLE 4: FURTHER DETAILED ASSESSMENT OF R-551 - LAND NORTH EAST OF REDBOURN. TO BE READ IN CONJUNCTION WITH APPENDIX 1 AND 2.

To check the unrestricted sprawl of large built up areas

Strategic Site	Text from Table 2	Further Assessment Notes	Notes:
Topography	Land slopes down from west to east, with small valley containing the River Ver running north-south through the eastern part of the Site.	<p>The west to east slope across the Site is relatively gentle at circa 1:40 falling from above 120mAOD to 100mAOD but with steeper slopes on its eastern edge towards the River Ver where it falls to below 100mAOD. The settlement of Redbourn lies on a north west to south east slope at a similar gradient and thus the topography of the Site and the existing settlement are alike. The built development of the town contains and limit views towards the Site from the settlement except on its edges to the Site.</p> <p>To the north of the Site, the topography is similar in nature to the Site with a west to east slope towards the River Ver valley. To the east and north east of the Site, the land rises more steeply beyond the River Ver towards a local ridgeline where the levels rise to typically 110mAOD to the north east and exceed 130mAOD to the east this forming a landform which visually contains the site and its eastern context from the topography further east. This higher ground is often well wooded. To the south east of Redbourn, this ridge continues to wrap around the settlement but drops away towards the southern side of the town.</p>	<p>See Appendix 1, Figure 1 illustrating the topography of the Site and local context.</p> <p>See Representative Viewpoint Photographs 4, 6, 7, 11, 12, 13, 15, 17, 18 illustrating assessment notes.</p>
Boundary vegetation within Site	Some field boundary hedgerows, with scattered mature trees, particularly either side of public footpath through Site.	<p>There is a well-maintained hedgerow to the much of the western boundary with Harpenden Lane (also known as Dunstable Road along this stretch) with maturing trees within the hedgerow and road verge.</p> <p>The south western boundary corner of the Site is formed by a mixture of hedgerows and large mature trees enveloping an area of the settlement comprising the fire station, residential property, sheds, grassland paddock and a large allotment Site.</p> <p>Along the southern boundary of the Site, there is an established hedgerow to the north side of Harpenden Lane, this including a section to the east comprising mature trees.</p> <p>The southern section of the eastern Site boundary along the A5183 comprises a well-established belt of trees adjacent to both sides of the road.</p> <p>The north eastern Site boundary comprises a hedgerow which is generally taller in the southern section and lower in the northern section of along the A5183 western side and with a combination of hedgerow, a belt of trees and woodland block on its eastern side.</p> <p>The norther Site boundary comprises of a continuous narrow belt of mature trees and unmanaged tall hedgerow forming an irregular edge to the grassland field beyond, through which runs a public footpath. To the north west, the boundary abuts a residential property located off Harpenden Lane (Dunstable Road).</p>	<p>See Appendix 2, Figure 01b illustrating the external Site boundaries.</p> <p>See Representative Viewpoint Photographs 1, 5, 7, 8, 9, 19, 20 illustrating assessment notes.</p>
Other boundaries within Site	River Ver	Within the Site, comprising a series of arable fields with grasslands to the northern and eastern edges, many of the western fields have open internal boundaries except for one east-west running well maintained hedgerow in the central part. However, there is a strongly defined greenway linking via a dog-legged route to the A5183 to Harpenden Lane in to the south of the Site with hedgerows both sides containing a number of mature individual trees. The Ver valley Walk 3 (a public footpath) runs down the green lane. On the eastern side, running parallel to the A5183 is a fragmented hedgerow running along the side of the River Ver.	<p>See Appendix 2, Figure 01b illustrating the internal Site boundaries.</p> <p>See Representative Viewpoint Photographs 10, 11, 12, 13, 14, 18 illustrating assessment notes.</p>

Strategic Site	Text from Table 2	Further Assessment Notes	Notes:
Surrounding context	<p>Site situated to the north-east of Redbourn. Existing residential areas adjacent to the south-west and south-east of the Site.</p> <p>Residential properties and meadows to the north-west of the Site, golf course to the north, arable and grazed fields to the east.</p>	<p>The Site lies within an area well defined and contained by the existing built development of Redbourn to the south, south west and west of the Site with the A 5183 wrapping around the eastern and north eastern edges and small triangle of rural land to the north between the A5183 and Harpenden Lane. The southern and western edges have a positive relationship with residential development fronting the Site and to the south western corner, there is a rectangular shaped area of mixed urban and suburban land uses.</p> <p>Beyond the Site to the north and east of the A5183, the eastern and western edges of which is strongly defined by well-established woodland, tree belts and hedgerows, the countryside character dominates with rising landform often well treed and wooded enclosing the local rural landscape to the north east, east and south east.</p> <p>From within the larger fields of the Site to the west and north of the green lane which are almost wholly devoid of hedgerows and with gently sloping land, there is a strong visual relationship to the built development to the west along Harpenden Lane (Dunstable Road), the south west (where the fire station tower acts as a local landmark) and south along Harpenden Lane. The northern boundary acts as a strong visual barrier screening views out of the site and so no discernible countryside beyond can be readily seen except for some higher land to the north east. The eastern rural areas on rising ground can be appreciated from the western fields but the green lane with its double hedgerow and occasional trees, and the A5183 boundary vegetation break up the immediacy of this visual relationship.</p> <p>From within the smaller area of fields within the Site to the east and south of the green lane, there is a stronger visual and topographic relationship to the rural land to the east and south east where some areas of higher land can be seen above the A5183 boundary vegetation. Views towards the built edges of Redbourn are screened by the green lane with its double hedgerow and occasional trees except for a length of houses to the south of Harpenden Lane.</p>	<p>See Appendix 1, Figure 1 and Appendix 2, Figures 01a and 01b illustrating the surrounding context to the Site.</p> <p>See Representative Viewpoint Photographs 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 15, 16, 17, 19, 20, 21 illustrating assessment notes.</p>
Boundaries to the countryside	<p>NE boundary – A5183, major road, no pavement, lighting only at roundabout. Hedgerows and tree belts on either side, with some gaps.</p> <p>NW boundary – hedgerow / tree belts along field boundaries.</p>	<p>Beyond the eastern and north eastern of the A5183 comprising a well-established belt of trees adjacent to both sides of the road, there is an area of mixed arable and pastures, woodland blocks and tree belts and to the north and north east, the Redbourn Golf Club and a small number of farms and residential properties. This has a strongly rural character although the road forms a strong edge and from where some glimpsed views towards the built up edge of Harpenden can be gained by vehicle users.</p> <p>To the central north of the Site, beyond the strongly defined narrow belt of mature trees and unmanaged hedgerow, are grasslands, unmanaged hedgerows and a woodland block, with the A5183 and golf course beyond. This has a rural character. To the north west, the residential property located off Harpenden Lane (Dunstable Road) is well hidden by trees and hedgerows except where it fronts Harpenden Lane (Dunstable Road). This stretch of road has a variety of commercial and residential located on its western side, generally set back and well-screened by trees and hedgerows giving a suburban character to this area.</p>	<p>See Appendix 1, Figure 1 and Appendix 2, Figures 01a and 01b illustrating the surrounding context to the Site.</p> <p>See Representative Viewpoint Photographs 4, 5, 7, 8, 9, 11, 12, illustrating assessment notes.</p>
Boundaries with existing settlement	<p>SW boundary – Dunstable Road, wide urban road with pavements and street lighting. Hedgerow with occasional mature trees along Site boundary to north-east of road. Residential properties to the south-west of road. Fire station at southern corner of Site.</p> <p>SE boundary – Harpenden Lane. Lighting, pavement along southern-eastern side, with existing properties facing the Site. Hedgerow along Site boundary to the north-west of the road</p>	<p>The western edge of Harpenden Lane (Dunstable Road) comprises an area of residential streets and the Redbourn Recreation Centre with associated playing fields. The majority of properties, comprising single and two storey dwellings, positively front the road and overlook the Site although some are hidden behind mature trees and hedgerows. The road has a footway to both sides and is lit by street lamps, the character of the road being strongly urbanised though with the eastern side being more rural in nature beyond the block of development to the south east of the Site.</p> <p>To the south western of the Site the area of the settlement comprising the fire station, residential property, sheds grassland paddock, and a large allotment Site has a suburban character with its mixture of land uses but.</p> <p>To the south of the Site, along the central section of Harpenden Lane there is an established area of mainly two storey dwellings positively fronting the road and overlooking the Site. This has a strongly urbanised character especially as there are few hedgerows and trees screening the houses and the street is lit with street lamps. Along the eastern length of the road, there are houses set back from the road edge behind trees and hedgerows and a tree belt on the north side of the road which give this section a more suburban character and also the feeling of entering the town as the road signs showing the Harpenden arrival are located here.</p>	<p>See Appendix 1, Figure 1 and Appendix 2, Figures 01a and 01b illustrating the surrounding context to the Site.</p> <p>See Representative Viewpoint Photographs 1, 2, 3, 4, 6, 13, 15, 16, 17, 19, 20, 21 illustrating assessment notes.</p>

Strategic Site	Text from Table 2	Further Assessment Notes	Notes:
<p>Overall ability of Site to contain new development and limit further future expansion</p>	<p>Significant</p>	<p>The combination of strong urbanised and largely positively fronting boundaries of the settlement of Redbourn to the west, south west and south boundaries to the Site, and well defined and vegetated A5183 corridor result in an area which would be able to well contain and limit expansion into the wider strongly rural landscape to the east and north. The areas to the west and north of the green lane would be particularly well suited in this respect and the green lane with double hedgerows and trees would provide a strongly defined edge and feature defining settlement neighbourhood separation. The urbanised street scene along the edges of Harpenden Lane would integrate well with new development to the Site and there would be design opportunities to create a positive expansion to the north western corner of Harpenden Lane and consolidate the urban area. The northern and north eastern Site edges could be further enclosed by additional tree belt planting to the A5183 and northern edges, a feature already found in the local landscape.</p> <p>The smaller eastern fields would still be suitable for development due to the lower topography which would help reduce the extent of visibility from the local context, combined with the strongly treed A5183 road corridor, with frontage to the south onto Harpenden Lane. The nature of the development here may be better suited to lower density development and areas of public open space. In particular, open areas and recreational sports fields could be located where there are views from the higher land to the east. Such views would be limited, as there are few properties, highways and PROWs from which views may be gained, and a strongly wooded intervening land cover. The eastern edge of the Site could be further enclosed by additional tree belt planting to the A5183, a feature already found in the local landscape.</p>	<p>See Appendix 1, Figure 1 and Appendix 2, Figures 01a and 01b illustrating the surrounding context to the Site.</p> <p>See Representative Viewpoint Photographs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21 illustrating assessment notes.</p>

8.0 CONCLUSION

8.0.1 The 12 green belt sites identified by St Albans Council strategic sites assessment have been shown to have varying greenbelt quality, functions, landscape characteristics and relationships to the existing urban environment.

8.0.2 There are two key tests for each site which this study focuses on:

1. To check the unrestricted sprawl of large built-up areas;
2. To assist in safeguarding the countryside from encroachment.

8.0.3 With regard to test 1, the ability of each site to check the unrestricted sprawl of large built-up areas, this assessment has demonstrated that many of the identified sites have a varying degree of Overall landscape sensitivity to sprawl. The assessment also found a varying but related Contribution towards Green Belt purpose of restricting sprawl of large built-up areas. The Overall strength of Site against Green Belt Purpose was also determined. This is shown in **Table 2** and summarised by ranking in **Table 5** below.

TABLE 5: SITES OVERALL LANDSCAPE SENSITIVITY TO SPRAWL RANKINGS

Strategic site	Overall landscape sensitivity to sprawl (High, Medium, Low)	Contribution towards Green Belt purpose of restricting sprawl of large built-up areas (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose (0 – 5)
R-551. Land north east of Redbourn	Low	Limited	1
H-583. Land at North East Harpenden	Low	Limited	1
SM-626. Oaklands College, Smallford (East St Albans)	Low	Limited	1
PS-607. Former Radlett Aerodrome	Low	Limited	1
CG-561. Land at Chiswell Green	Low	Limited	1
OS-400c. East Hemel Hempstead (South)	Medium	Partial	3
OS-400a. East Hemel Hempstead (North)	Medium	Partial	3
H-595. Land at North West Harpenden	Medium	Partial	3
SA-605. North St Albans	Medium	Partial	3
LC-621. Land west of London Colney	Medium	Partial	3
OS-400d. South East Hemel Hempstead	High	Significant	5
OS-602. North Hemel Hempstead	High	Significant	5

8.0.4 Site R-551 - Land north east of Redbourn, was found to have:

- a **Low** Overall landscape sensitivity to sprawl and **Limited** Contribution towards Green Belt purpose of restricting sprawl of large built-up areas.

8.0.5 The assessment of all the 12 sites shows that there were:

- 2 sites with High Sensitivity and Significant Contribution towards Green Belt purpose of restricting sprawl of large built-up areas with an Overall strength of site against Green Belt Purpose score of 5;
- 5 sites with Medium sensitivity and Partial Contribution towards Green Belt purpose of restricting sprawl of large built-up areas with an Overall strength of site against Green Belt Purpose score of 3; and
- 5 sites with Low sensitivity and Limited Contribution towards Green Belt purpose of restricting sprawl of large built-up areas with an Overall strength of site against Green Belt Purpose score of 1.

8.0.6 Therefore, in comparison to the 12 sites, Site R-551 would be a more suitable development site than 7 other sites in regard to where unlimited sprawl of large built-up areas would be checked. It has an Overall strength of Site against Green Belt Purpose score of 1, this being lower than 7 other sites.

8.0.7 With regard to test 2, to assist in safeguarding the countryside from encroachment, similarly, a range of values is demonstrated for the Overall landscape sensitivity to encroachment. There is also, a varying but related Contribution a site makes towards the purpose of safeguarding countryside from encroachment. The Overall strength of site against Green Belt Purpose is given too. This is shown in **Table 3** and summarised by ranking in **Table 6** below.

TABLE 6: SITES OVERALL LANDSCAPE SENSITIVITY TO ENCROACHMENT RANKINGS

Strategic site	Overall landscape sensitivity to encroachment (High, Medium, Low)	Contribution a site makes towards the purpose of safeguarding countryside from encroachment (Significant, Partial, Limited)	Overall strength of site against Green Belt Purpose (0 – 5)
PS-607. Former Radlett Aerodrome	Low	Limited	1
CG-561. Land at Chiswell Green	Low	Limited	1
H-595. Land at North West Harpenden	Low	Limited	1
R-551. Land north east of Redbourn	Low-Medium	Partial	2
SM-626. Oaklands College, Smallford (East St Albans)	Low-Medium	Partial	2
OS-400a. East Hemel Hempstead (North)	Low-Medium	Partial	2
SA-605. North St Albans	Low-Medium	Partial	2
H-583. Land at North East Harpenden	Medium	Partial	3
LC-621. Land west of London Colney	Medium	Partial	3
OS-400c. East Hemel Hempstead (South)	Medium-High	Significant	4
OS-400d. South East Hemel Hempstead	Medium-High	Significant	4
OS-602. North Hemel Hempstead	High	Significant	5

8.0.8 Site R-551 - Land north east of Redbourn, was found to have:

- a **Low-Medium** Overall landscape sensitivity to encroachment and **Limited-Partial** Contribution a site makes towards the purpose of safeguarding countryside from encroachment.

8.0.9 The assessment of all the 12 sites shows that there was:

- 1 site with High sensitivity to encroachment and Significant Contribution a site makes towards the purpose of safeguarding countryside from encroachment;
- 2 sites with Medium-High sensitivity to encroachment and Significant Contribution a site makes towards the purpose of safeguarding countryside from encroachment;
- 2 sites with Medium sensitivity to encroachment and Partial Contribution a site makes towards the purpose of safeguarding countryside from encroachment;
- 4 sites with Low-Medium sensitivity to encroachment and Partial Contribution a site makes towards the purpose of safeguarding countryside from encroachment; and
- 3 sites with Low sensitivity to encroachment and Limited Contribution a site makes towards the purpose of safeguarding countryside from encroachment.

8.0.10 Therefore, in comparison to the 12 sites, Site R-551 would be a less suitable development site than 3 sites, equal to 3 sites and a more suitable development site than 5 sites in regard to where unlimited sprawl of large built-up areas would be checked.

8.0.11 **Table 4** provides further assessment details and evidence to demonstrate that in regard to Site R-551:

- The combination of strong urbanised and largely positively fronting boundaries of the settlement of Redbourn to the west, south west and south boundaries to the Site, and well defined and vegetated A5183 corridor, result in an area which would be able to well contain and limit expansion into the wider strongly rural landscape to the east and north. The areas to the west and north of the green lane would be particularly well suited in this respect and the green lane with double hedgerows and trees would provide a strongly defined edge and feature defining settlement neighbourhood separation. The urbanised street scene along the edges of Harpenden Lane would integrate well with new development to the Site and there would be design opportunities to create a positive expansion to the north western corner of Harpenden Lane and consolidate the urban area. The northern and north eastern Site edges could be further enclosed by additional tree belt planting to the A5183 and northern edges, a feature already found in the local landscape.

- The smaller eastern fields would still be suitable for development due to the lower topography which would help reduce the extent of visibility from the local context, combined with the strongly treed A5183 road corridor, with frontage to the south onto Harpenden Lane. The nature of the development here may be better suited to lower density development and areas of public open space. In particular, open areas and recreational sports fields could be located where there are views from the higher land to the east. Such views would be limited, as there are few properties, highways and PROWs from which views may be gained, and a strongly wooded intervening land cover. The eastern edge of the Site could be further enclosed by additional tree belt planting to the A5183, a feature already found in the local landscape.

8.0.12 In conclusion, Site R-551 Land north east of Redbourn, is a suitable site for carefully designed development in comparison with the majority of the other 11 Strategic sites.

Appendices

- 1: St Albans City and District Council – Site Plans and Photographs
- 2: Detailed Assessment – Plans and Photographs for Strategic Site R-551 North East Redbourn

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This report has been prepared in good faith, with all reasonable skill, care and diligence, based on information provided or available at the time of its preparation and within the scope of work agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

The report is provided for the sole use of the named client and is confidential to them and their professional advisors. No responsibility is accepted to others.

Examination of the St. Albans City & District Council Local Plan
Inspectors: Mrs. Louise Crosby MA MRTPI and
Mrs. Elaine Worthington BA (Hons) MT MUED MRTPI

Programme Officer: Mrs Louise St John Howe
Mobile:

14 April, 2020

Mr. Chris Briggs,
Spatial Planning Manager,
St Albans City & District Council.

By email only

Dear Mr Briggs,

EXAMINATION OF THE ST ALBANS CITY AND DISTRICT LOCAL PLAN

Introduction

1. The Stage 1 hearing sessions were held between 21 and 23 January 2020. Over those three days we heard discussion on legal compliance, the Duty to Cooperate, the spatial strategy and matters relating to the Green Belt.
2. We wrote to the Council on the 27 January 2020 to raise our serious concerns in terms of legal compliance and soundness and to cancel the subsequent hearing sessions arranged for February 2020. This letter sets out our concerns in detail. We are conscious that this is a difficult time for everyone due to Covid 19 and in particular Councils. We also appreciate that it is not a good time to receive unfavourable news. However, Mr Briggs has indicated to the Programme Officer that the Council wish to receive our letter as soon as possible.
3. Whilst we will not reach final conclusions on these points until you have had the opportunity to respond to this letter in summary our main concerns are:
 - Failure to engage constructively and actively with neighbouring authorities on the strategic matters of (a) the Radlett Strategic Rail Freight Interchange proposal and (b) their ability to accommodate St Alban's housing needs outside of the Green Belt;
 - Plan preparation not in accordance with the Council's Statement of Community Involvement;
 - Inadequate evidence to support the Council's contention that exceptional circumstances exist to alter the boundaries of the Green Belt;
 - Failure of the Sustainability Appraisal to consider some seemingly credible and obvious reasonable alternatives to the policies and proposals of the plan;
 - Failure of the plan to meet objectively-assessed needs; and
 - Absence of key pieces of supporting evidence for the plan.

Legal Compliance

Duty to Cooperate (DtC)

4. Section 33A of the Planning and Compulsory Purchase Act 2004 (The Act) indicates that the DtC applies to the preparation of local plans, so far as relating to a strategic matter. A strategic matter is defined in Section 33A(4) as: (a) sustainable development or use of land that would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and (b) sustainable development or use of land in a two-tier area if the development or use is a county matter (i) or has or would have a significant impact on a county matter (ii).
5. The DtC requires the Council to engage constructively, actively and on an on-going basis in relation to the preparation of local plan documents so far as relating to a strategic matter (in order to maximise the effectiveness of plan preparation).
6. Paragraph 25 of the National Planning Policy Framework (the Framework) states that strategic policy-making bodies should collaborate with one another, and engage with their local communities and relevant bodies, to identify the relevant strategic matters which they need to address in their plans. Paragraph 26 is clear that effective and on-going joint working between strategic policy making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
7. Whilst Section 19 of the Act requires the Council to identify its strategic policies, the Courts have held that issues such as what would amount to strategic planning matters are all matters of judgement that are highly sensitive to the facts and circumstances of the case.
8. A large site in the district (the Radlett site) has planning permission for a Strategic Rail Freight Interchange (SRFI), but is proposed for housing in the Plan as the Park Street Garden Village (PSGV) Broad Location. The SRFI is not identified as a strategic matter by the Council. It is argued that this is because it is not a proposal included in the Plan. The proposed alternative development of PSGV has the effect of precluding the SRFI. On this basis, the Council considers that it did not need to cooperate in relation to this matter, since once the SRFI ceased to be a strategic site promoted under the Plan, it was no longer required to engage in the DtC discussions.
9. However, national policy and guidance is clear that unmet needs, and how they could be met elsewhere, are a key issue to be considered through the DtC. The Guidance (paragraph 022 Reference ID: 61-022-20190315) advises that strategic policy making authorities should explore all available options for addressing strategic matters within their own

planning area, unless they can demonstrate to do so would contradict policies set out in the Framework. If they are unable to do so they should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their plans for examination.

10. It seems to us that it is illogical to argue that the DtC applies only to proposals in the Plan, since by their very nature, approaches to unmet needs will not be included in the Plan (as there is no provision to address them there). In our view, the SRFI is a strategic matter for the purposes of the DtC, as are allocations for housing development to meet identified housing need. Thus, the use of the land at the Radlett site, whether as a SRFI or a housing allocation, is a strategic matter which the Council should have been engaging and cooperating with neighbouring authorities about.
11. It is not evident from the Council's Duty to Cooperate Compliance Statement (CD028) or Matter 2 hearing statement (neither of which mention the SRFI) how the Council has engaged with other LPAs or interested parties on this matter. There is nothing before us to demonstrate that other nearby authorities have been approached in terms of the possibilities of accommodating either the SRFI, or the housing now proposed on the site (in order to safeguard the SRFI permission). Indeed, The Council's note at ED31 indicates that following the site's identification for PSGV the DtC discussions focussed on that housing scheme, rather than the loss of the SRFI.
12. Both the site promoter and Network Rail raise objections to the Plan under the DtC. Whilst the Council referred to verbal conversations with senior members of staff at MHCLG who were aware of the approach to the SRFI in the Plan, a lack of objections from MHCLG is not an indication that the DtC has been met.
13. Overall, there is no evidence of effective joint working or cooperation on this important strategic cross boundary matter regarding a nationally significance infrastructure scheme. We cannot be content that the Council has explored all available options to address this strategic matter within its own planning area or engaged with others in an attempt to secure its provision elsewhere or that it has reached the conclusion not to provide for it in the Plan in the full knowledge of neighbouring authorities' views on this.
14. For these reasons, we are not satisfied that the Council has provided evidence to demonstrate on-going, active and constructive engagement regarding the SRFI. Whilst the Council's decision not to pursue the allocation of the SRFI in the Plan does not in itself indicate a failure to comply with the DtC, the Council has not engaged or cooperated with other bodies (including other LPAs) with regard to this issue. This includes in relation to the reasons why it no longer considers it necessary to include the SRFI as an allocation in the Plan, or why housing is now proposed there. Thus, the effectiveness of the Council's plan preparation has not been maximised in this regard.

15. The Council's approach to the Green Belt is also of concern to us in relation to the DtC. The Plan proposes substantial Green Belt boundary alterations to enable land to come forward for development. Paragraph 137 of the Framework requires that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic planning authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. It has not been demonstrated that the Council's approach to the Green Belt has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground (SoCG), in accordance with paragraph 137(c) of the Framework.
16. Paragraph 1.4 of ED25C refers to on-going dialogue with neighbouring authorities throughout 2013-2016 and 2017-2019 to see if they could accommodate any of the Council's housing need. The Council refers to the June 2018 Planning Policy Committee (PPC) report which finds the DtC discussions with adjoining and nearby authorities currently show no reasonable prospect of the district's housing need being met elsewhere at this point in time. ED25C also refers to the DtC Compliance Statement (CD028) as evidence of this.
17. However, the meetings with nearby authorities referred to in CD028 took place for the most part between May and August 2018 and the notes of these indicate that the Council intended to meet all its housing needs within its boundary. Whilst we appreciate that neighbouring authorities are likely to have their own Green Belt constraints and housing pressures, there is no mention of the question being asked as to whether any of the neighbouring authorities could take any of St Albans' need (that would otherwise require the release of Green Belt land). This is another example of a lack of on-going, active and constructive engagement in relation to an important strategic matter.
18. Paragraph 27 of the Framework indicates that in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more SoCGs, documenting the cross boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in the Guidance and be made publicly available throughout the plan-making process to provide transparency.
19. The Guidance indicates that a SoCG is a written record of the progress made by strategic policy making authorities during the process of planning for strategic cross boundary matters. It documents where effective cooperation is and is not happening throughout the plan making process and is a way of demonstrating at examination that plans are deliverable over the plan period. The Guidance is clear that a SoCG also forms part of the evidence required to demonstrate that the Council has complied with the DtC. The Council has provided a SoCG relating to the emerging Joint Structure Plan (JSP) but not in relation to this Plan. There are no SoCGs with any of the neighbouring or nearby LPAs or any of the DtC

bodies.

20. Although a joint Dacorum Borough Council and St Albans City and District Council Duty to Cooperate Updated Position Statement (January 2020) (ED32) has been provided, this is not a SoCG. It summarises the progress made to date to resolve the strategic planning matters between the Council and Dacorum. It states that since December 2019 discussions between the two Councils have continued at pace and both agree that they consider sufficient progress has been made on the principles of the strategic planning matters pertinent to the DtC. However, the DtC concerns cooperation prior to the submission of the Plan (which was in March 2019). The Updated Position Statement sets out a package of arrangements that will be put in place, the principles for which will be expanded upon and precise details given in a SoCG, a draft of which is anticipated in May 2020.
21. As such, contrary to the advice in the Guidance, there are no SoCGs before us to demonstrate that the Council has complied with the DtC. Consequently, we are not convinced that the Council has met the terms of the Guidance and cannot be assured that it has fulfilled its DtC duty in maximising the effectiveness of plan preparation by engaging constructively, actively and on an on-going basis with other bodies that are subject to the DtC.
22. A failure to meet the DtC cannot be remedied during the examination since it applies to plan preparation which ends when the Plan is submitted for examination. Section 20(7A) of the Act requires that the examiners must recommend non-adoption of the Plan if they consider that the Council has not complied with the DtC. As previously indicated and set out in more detail below, whilst our concerns are substantial, we will not make an absolute final decision as to whether or not the DtC has been met until the Council has had the chance to respond to this letter.

Statement of Community Involvement (SCI)

23. Each LPA is required to prepare a SCI setting out their policy for involving persons with an interest in the development of the area when preparing and revising their local plans. Amongst other things, the SCI should explain how the authority intends to go about publicising the Plan and undertaking consultation on it.
24. Section 19(3) of the Act states that in preparing local development documents the authority must comply with their SCI. The Council's SCI Update 2017 (Doc SCI 001) states that its purpose is to set out, amongst other things, how and when the community and other stakeholders will be consulted on the preparation and revision of documents that will make up the Plan.
25. Section 2 of the SCI considers consultation on the Plan and discusses the different stages in its preparation. Tables 1 and 2 detail the consultation techniques that may be used at each stage of the DPD and SPD preparation process. Paragraph 2.14 explains that the stages may vary

between different types of planning document and be subject to review over time. Even so, Figure 2 refers to Issues and Options/Preferred Options, and paragraph 2.17 refers to a Preferred Options stage.

26. Moreover, paragraph 2.22 of the SCI states that consultation will initially seek the views of specific and general consultation bodies to identify Issues and Options as part of on-going engagement after Regulation 18, and that wider consultation with these bodies, local communities and businesses and other interested parties and individuals will take place as 'preferred options' are identified. Table 1 includes a specific row for a Preferred Options consultation stage, that is separate and distinct from the Issues and Options stage, with a consultation period of a minimum of 6 weeks.
27. We consider that the wording of the SCI sets up a reasonable expectation that the Council would undertake a Preferred Options consultation on the Plan prior to its submission. However, this did not happen. The Plan progressed from Issues and Options in January/February 2018 to the Publication Draft Plan in September/October 2018 (with no Preferred Options stage). This being so, notwithstanding the flexibility allowed by paragraph 2.17 of the SCI, the Plan has not been prepared in compliance with the SCI and there has been a breach of Section 19(3) of the Act.
28. That said, a key issue in relation to this matter is whether any affected party has suffered any prejudice as a result of the breach, and if so whether any such prejudice can be remedied during the examination. If the examination were to continue, an assessment would need to be made as to whether the expectation which arose from the SCI of consultation on Preferred Options (and the omission of that stage) has prejudiced the interests of any parties. Consideration as to whether this could be resolved during the examination would also be necessary. Given our findings in relation to the DtC, we have not come to a view on this matter but raise it in the context of the Council's future plan making activities.

Soundness

29. In addition to the legal compliance matters identified above, we also have a number concerns in relation to the soundness of the Plan. Whilst we have not reached final conclusions on these issues and they may be matters which could potentially be resolved through the examination if it were able to continue, we believe it is helpful to highlight these points to you at this stage if only to assist your plan making in the future

Green Belt

30. Paragraph 136 of the Framework sets out 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. The Council's approach to the Green Belt is set out in Policy S3 and clarified in the response to our Initial Question 16 and in the subsequently produced Green Belt Topic Paper (ED25C). Further information has been

provided in the Council's hearing statement and via the hearings.

31. The Green Belt Review Purposes Assessment (November 2013) was prepared jointly for the Council with Dacorum and Welwyn Hatfield Councils by SKM (GB004). This Stage 1 of the review identified large parcels of land across the three authorities. Those areas contributing least to the Green Belt were determined and a number of strategic sub areas in St Albans were identified for further investigation. These were taken forward to Stage 2 where SKM undertook a review and detailed assessment of those strategic sub areas in the Green Belt Review Sites and Boundaries Study (February 2014) (GB001).

Scale of unmet need

32. Whilst the Council indicated at the hearings that the 2013 Green Belt Review was not done with any level of development need or target in mind, it was prepared around the time that the Council was working on the previous SLP. At that time housing requirements were 8,720 (or 436 per annum) and so much lower than the current objectively assessed need (OAN) of 14,608 homes over the plan period. However, the Green Belt Review was not re-visited in the context of the much higher scale of unmet need which could only be met by Green Belt release that was subsequently identified in the Plan.

Strategic and smaller sites

33. GB004 identifies a number of strategic sub-areas along with some small scale sub-areas which are recommended to be considered for further assessment. The 8 strategic sub-areas are then considered in GB001 which identifies sites for potential Green Belt release. However, the small scale sub-areas identified in GB004 as making no or little contribution to the Green Belt purposes were not considered further and were deemed to fall outside the scope of the subsequent GB001 study.
34. In 2018, the Council undertook its strategic site selection work to review the sites identified by SKM and to seek further potential sites to make up the shortfall. In determining the extent of this shortfall the Council estimated that the total capacity of the 8 SKM sites, combined with the identified non-Green Belt capacity in the district falls well short of the 14,608 homes required (ED25C paragraph 1.19).
35. Strategic scale sites were defined as those capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares (ha) of developable land. Using this threshold, 70 sites were evaluated using a Red Amber Green (RAG) system over three stages. After Stage 3, the 8 strategic sub-areas identified in GB001 were the only sites to score green (low impact) and were taken forward (the ninth site is the employment site at East Hemel Hempstead). Additionally, four amber (medium impact) sites were identified at South East Hemel Hempstead, North Hemel Hempstead, PSGV and North East Redbourn.

36. The Council indicates that all of the 8 green sites, and 3 of the 4 amber sites were required to meet local housing need. The advantages of the three selected amber sites at South East Hemel Hempstead, North Hemel Hempstead, and PSGV were considered by the PPC to be greater than that for the non-selected site at North East Redbourn.
37. This approach raises a number of concerns. As part of the fundamental approach stemming from 2013/14, smaller sites (less than 500 dwellings or 14ha) have been excluded from the Green Belt Review and site selection process. This includes the smaller scale areas of land identified in GB004 as contributing least to Green Belt purposes. Paragraph 8.1.5 of GB004 is clear that the small-scale sub areas identified in that study may not be exhaustive. It also recognises that it is possible that additional potential small-scale boundary changes that would also not compromise the overall function of the Green Belt might be identified through a more detailed survey. Thus, the capacity from such smaller sites could be much higher than that estimated by the Council.
38. Additionally, a number of sites were submitted to the process which are not small, but do not meet the agreed threshold. These are identified in Table 2 to Appendix 1 of the May 2018 PPC report. Although they are between 10.5 and 14ha and/or a capacity of 375 to 500 dwellings they were considered to fall sufficiently below the overall scale and dwelling capacity not to be assessed. These are nonetheless large sites which could potentially deliver a good number of homes.
39. The withdrawn SLP identified the potential for small scale Green Belt greenfield sites to be looked at in more detailed in the then envisaged subsequent detailed Local Plan. Thus, at that time there was an anticipation that such sites would be included in the Council's overall housing strategy, alongside the larger strategic sites/ Broad Locations. However, in developing the Plan now being examined, it seems that that any consideration of the potential of such smaller sites has been overlooked.
40. In light of the large number of homes that would need to be accommodated, the Council decided that only strategic scale Green Belt sites would be taken forward in the Plan. The advantages of strategic scale sites over smaller ones was an explicit evaluative choice made by the Council. It was based on a judgement that the strategic scale sites offer infrastructure and community benefits in way that small sites do not and in light of points raised in the public consultation responses to the Plan.
41. In looking at Green Belt releases we have concerns about the narrow focus that has been placed on only strategic sites. This has ruled out a number of sites that have already been found to impact least on the purposes of the Green Belt. It may well also have ruled out other non-strategic sites with limited significant impacts on the Green Belt which may have arisen from a finer grained Green Belt Review.

42. Whilst the Council indicates in the May 2018 PPC report that small sites in the Green Belt are not needed (and so have not been assessed) this position appears at odds with the context of the identified shortfall situation. Moreover, the decision to discount all smaller sites in the Green Belt was made in 2013/14 and not in light of the higher levels of need for housing that are now being faced by the district. In terms of the contribution they make to Green Belt purposes, it has not been demonstrated whether a range of smaller sites would be preferable to the shortfall sites selected.
43. Additionally, we see no reason why the identification of some smaller sites would unacceptably spread the adverse impacts of development on Green Belt purposes. Whilst this would extend the impact of development over a wider geographic area, the extent of the resultant impacts would be likely to be smaller given the more limited scale of the sites (in comparison to the cumulative impact on the Green Belt purposes of developing large adjoining strategic sites, such as to the east of Hemel Hempstead as proposed).
44. We accept that large scale urban extensions would provide significant amounts of new infrastructure which both the new and already established communities would benefit from. On the other hand, a range of sites including smaller sites could also provide benefits. For example, they could be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately.
45. Overall, although previously recognised as a source of housing to be identified at some stage, smaller sites have been disregarded as part of the plan making process. It is our view that this approach has ruled out an important potential source of housing that may have been found to have a lesser impact on the purposes of the Green Belt than the sites selected without sufficient justification.

Previously developed land (PDL)

46. Paragraph 138 of the Framework states that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport.
47. GB004 does not consider PDL or apply any specific focus on PDL. At paragraph 5.2.20 it indicates that the fifth national purpose of the Green Belt to assist urban regeneration has been screened out. This explains that assisting urban regeneration, by encouraging the recycling of derelict and other urban land is considered to be more complex to assess than the other four purposes because the relationship between the Green Belt and recycling or urban land is influenced by a range of external factors.
48. Furthermore, as a result of the site selection process outlined above, any PDL site or site in a sustainable location well served by public transport in the Green Belt below the size threshold has been discounted for

consideration. This is so regardless of its impact on Green Belt purposes. This approach fails to give first consideration to PDL land and/or that which is well served by public transport in the Green Belt, and the required process of prioritisation is not evident.

Methodology for the assessment of sites

49. We also have concerns regarding the strategic site selection process. At Stage 1 a high number of sites were immediately discounted from further assessment on the basis of their Green Belt Review evaluation (and were rated red). The 4 identified amber sites all had only 1 or zero effects on the Green Belt Purposes (as identified for the relevant parcels in the 2013 Green Belt Review). However, representors refer to a number of sites that were rejected at Stage 1 despite also having zero or only 1 significant impact on Green Belt purposes (in the same way as the amber and green rated sites).
50. The 8 strategic sub-areas shortlisted in the 2013 study and carried forward were already the subject of a detailed Green Belt assessment. The amber rated sites were assessed by officers and this is evident from the additional text in the Site Evaluation Forms at Appendix 3 of the May 2018 PPC report. However, unless they had been considered as small sub-scale areas in the 2013 Green Belt Review, the red rated sites are subject only to an additional brief standardised paragraph of text. Whilst the Council confirms that these are the assessments upon which it relies, no reason is given as to why they were not subject to a detailed assessment in the same way as the green and amber sites. Without these, it is difficult to see why the amber sites were found to perform better.
51. Another anomaly is that in re-assessing the 4 amber sites, the impact they would have on the Green Belt seems to have decreased compared to the situation in 2013. This is the case for PSGV where the 2013 assessment of parcel GB30 found 3 significant effects to the Green Belt purposes, but the re-assessment (on the basis of a limited area south of the A414) finds it to have only one significant effect.
52. Thus, the significant effects of the smaller parcel of land on Green Belt purposes have reduced in comparison to that of the wider parcel. However, such an assessment of smaller parts of other discounted strategic parcels has not been undertaken. As a result, the impact of smaller sites as opposed to the larger parcels has not been consistently reviewed across the board to allow informed decisions on Green Belt release to be made.
53. Additionally, there are issues with the site evaluation forms. For example, although Stage 1 of the PSGV site evaluation form acknowledges the existing significant permission of the SRFI, this makes no changes to the site's amber rating. Additionally, under Stage 2 (suitability) it is found to be green with no overriding constraints to development (despite the permitted SRFI). Furthermore, under Stage 3 (availability), notwithstanding the planning permission for the SRFI, it is recorded that

there are no overriding constraints to development for housing in terms of land ownership, restrictive covenants etc (and a green score is given). This does not seem a fair or credible assessment of the site and calls into question its overall amber rating. It also casts some doubts as to the reliability of the overall assessment process.

Compensatory improvements

54. Paragraph 138 of the Framework sets out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The Council refers to Policy S6 and the requirements set out under each of the Broad Locations. It also anticipates that further compensatory improvements will emerge through the forthcoming masterplans for the Broad Locations and refers to the provisions of Plan Policy L29.
55. However, we have concerns as to whether such compensatory improvements have been identified in relation to all the Broad Locations, and if they would in fact be on land remaining in the Green Belt or on land within the Broad Locations themselves. There is also a lack of clear evidence to demonstrate that the developer or the Council owns or controls the land that would be needed in each instance.
56. Additionally, the Council confirmed at the hearings that the costs of the required improvements has not been specifically factored into the viability work for each of the Broad Locations. In the absence of the identification of particular schemes of improvement or any estimation of their likely costs, it is difficult for us to be satisfied that that the headroom in the viability of the Broad Locations would be sufficient to cover the required improvements as suggested by the Council. In light of all these factors, it is not clear to us how this important requirement of the Framework would be met.

Conclusion on the Green Belt

57. Paragraph 137 of the Framework states that before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. For the reasons set out above, we cannot be satisfied that this has been demonstrated. Nor can we agree with the statement in Policy S2 that the exceptional circumstances required for Green Belt release for development only exist in the Broad Locations.
58. The Council indicates at paragraph 1.3 of ED25C that the Plan process built on the earlier draft SLP work, in an updated context. However, the Green Belt Review was not re-visited in this updated context. If the examination were able to continue, a new Green Belt Review would need to be undertaken in accordance with the advice in the Framework and the Guidance and to address the concerns we have identified in this part of our letter.

Sustainability Appraisal

59. The Sustainability Appraisal (SA) of the Plan was carried out by TRL and the resulting report and appendices and Non-Technical Summary were published in September 2018 for consultation alongside the Plan. A subsequent SA Addendum was published in March 2019. This was prepared to report on the sustainability appraisal activities undertaken from the time of the representations on the Publication Plan in September/October 2018, up to the Submission of the Plan in March 2019.
60. The SA addendum report covers four main areas; analysis and responses to the representations made during the consultation on the Publication Plan and its accompanying SA; assessment of proposed Minor Modifications to the Plan; assessment of the proposed SRFI; and updates to the information in the SA Report (September 2018). These reports follow on from earlier SA work carried out to inform the previous SLP.
61. The 2018 SA is based on a previous strategy arrived at in 2014. Following an assessment of 4 different development strategy options, this found option 1a mixed location/scale development to be the most favourable. This was principally because the Council considered this option would provide the greatest social and economic benefits. Option 1b mixed location/scale development with smaller, but more sites, was another option considered and scored. The commentary in relation to this option indicates that "This would necessitate more work on detailed Green Belt Boundaries to see what might be appropriate as smaller scale alternatives in some of the selected locations".
62. As set out above, this additional Green Belt Review work has not been undertaken. Yet in table 5 (paragraph 73, Appendix E, Volume 2 of the 2018 SA), option 1a scores higher than option 1b in relation to the SA objectives; sustainable location, equality social, sustainable prosperity and revitalise town. It is difficult to see how these scores were reached objectively without the knowledge of where the smaller sites might be under option 1b. For example, they may have been on the edge of St Albans or Harpenden which to our minds could have scored at least the same if not higher in some or all of these categories than option 1a.
63. The SA generally makes optimistic assumptions about the benefits of option 1a and correspondingly negative assumptions about option 1b, without the evidence to support them. Consequently, these assessments lack the necessary degree of rigour and objectivity and are therefore unreliable.
64. This approach led to only the consideration of sites of more than 14ha and or 500 homes. This decision was underpinned to a large degree by the findings of the Green Belt Review and the strategic site selection work which we have expressed our concerns about above. Moreover, this threshold and strategy was conceived in the context of a different set of circumstances, such as a much lower housing requirement and at a time

when there was also no planning permission for the SRFI.

65. The assessment of development strategy options established in 2014 has not been properly reassessed to consider if the Plan's strategy is still an appropriate one, taking into account the material changes in circumstances between 2014 and 2018. Indeed, the Council's Regulation 18 consultation SA Working Note (January 2018) states in paragraph 4.3.3.3 "At this new Regulation 18 stage in the development of the Local Plan there has been no new assessment of sites or wider Broad Locations. This work will be undertaken during the SA that is undertaken as part of the development of the Publication Local Plan". However, this did not appear to happen in a transparent and objective manner, if at all.
66. In May 2018 a significant number of sites were submitted to the Council for consideration following a call for sites. These ranged in size enormously. However, only 12 were evaluated in detail and 11 of those were included in the Plan, the rest were disregarded. As recognised by the Council, the small sites that have been discounted from the strategic site selection process are not in all cases much smaller than 14ha. Some are of a considerable size and only just below the threshold. This is of particular concern given that the Plan contains two Broad Locations that are expected to accommodate less than 500 homes (S6 (ix) West of London Colney – 440 dwellings, and S6 (x) West of Chiswell Green – 365 dwellings).
67. As considered above, even when assessing the sites of 14ha and or 500 homes or more, those that scored red were given this score based on the 2013 Green Belt Review and the decision was taken not to revisit whether that was still appropriate. **Importantly, some of the sites assessed through the RAG system were extremely large, in some cases hundreds of hectares in size. No consideration was given to whether parts of those sites would score better in Green Belt terms and therefore make them competitors for other sites scoring green or amber.**
68. Leading on from this, there appears to have been no analysis of reasonable alternative sites that could accommodate less than 500 homes that may have scored better both in terms of the Green Belt purposes and/or sustainability objectives. This is despite references in the Framework for the need to plan for a variety of sites. For example, paragraph 68 indicates that, small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. Whilst there is a list of 'small' sites in appendix 5 of the Plan, they do not amount to the 10% referred to in paragraph 68a of the Framework. There is also little information about whether these include, for example, replacement dwellings.
69. Although the Council contends that sites of less than 500 homes and or 14ha will come forward as windfall sites, given that the majority of the undeveloped or unallocated land in the district is in the Green Belt, any such proposals would need to demonstrate "very special circumstances".

However, the Courts¹ have found that ““exceptional circumstances” is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires “very special circumstances””. Therefore, it is unlikely that sites, other than those allocated in the Plan or small infill or redevelopment sites in existing towns and villages, would come forward for residential development. Importantly paragraph 136 of the Framework advises that the time for altering Green Belt boundaries is through the preparation or updating of plans.

70. Whilst smaller sites may come forward in Neighbourhood Plans (NP), the Plan does not apportion any development to NPs and any changes to Green Belt boundaries have to be established through strategic policies, as set out in paragraph 136 of the Framework.
71. As set out above, PSGV has planning permission for a SRFI. Despite this, the SRFI is deemed by the Council not to be a reasonable alternative for housing. We have serious concerns that the Council had clearly made up its mind on this matter of great importance before carrying out the SA or the SA addendum work. Twice the SA addendum states that “the view of the Council is that the SRFI is not a ‘reasonable alternative’ for that site and therefore it was not assessed in the SA. However, for purposes of completeness the principle of developing an SRFI on the same site as that allocated for PSGV has now been assessed as part of this SA report addendum”.
72. The Council argues that the SRFI is not a reasonable alternative since the Government’s approach has a primary focus on housing. However, that is not what the Framework says. When read as a whole it identifies a number of priorities for sustainable development including both housing and large scale transport facilities (amongst other things).
73. The SA tables take no account of displacing the SRFI. If they did, North East Redbourn would be likely to attract a positive score as it would allow the SRFI to be provided, and the PSGV housing site would be reasonably expected to receive a negative score as it would lead to the non-provision of the SRFI. Moreover, the SA addendum fails to properly consider the SRFI and appropriately weight its environmental advantages. It underscores the positive effect that it would have on greenhouse gas emissions and fails to acknowledge the benefits to the local economy of the additional jobs that would arise.
74. Another serious flaw in the SA process is that the PSGV site scores are changed in relation to some objectives in the SA addendum when it is tested against the SRFI. The objectives in relation to ‘use of brownfield land’ and ‘historic environment’ change from a question mark in the 2018 SA to a cross in the SA addendum. However, the Council has not gone

¹ Compton Parish Council, Julian Cranwell and Ockham Parish Council v Guildford Borough Council, Secretary of State for Housing Communities and Local Government, Wisley Property Investments Ltd, Blackwell Park Ltd, Martin Grant Homes Ltd and Catesby Estates Plc [2019] EWHC 3242 (Admin)

back and looked at the effect of the re-scoring in relation to the ruling out of the North East Redbourn site in the 2018 SA (a site which was considered more favourably in terms of the Green Belt Review).

Conclusion on the SA and SA addendum

75. On the basis of our concerns set out above, we consider that there are a number of obvious and seemingly credible reasonable alternatives that have not been considered. This being so, we are not convinced that either the SA or the SA addendum has considered and compared reasonable alternatives as the Plan has evolved, including the preferred approach, and assessed these against the baseline environmental, economic and social characteristics of the area and the likely situation if the Plan were not to be adopted.
76. Therefore, the SA has not demonstrated that the spatial distribution of development is the most appropriate strategy given the reasonable alternatives available. The discrepancies in the scoring of the sites as highlighted also undermines the robustness of the assessment and calls into question the objectiveness of that process. Moreover, the Council does not appear to have approached the SA or the SA addendum with an open mind and in our view should have consulted on the SA Addendum.
77. Thus, with criterion b of paragraph 35 of the Framework in mind, we cannot find that the Plan is justified since it fails to be an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence. If the examination were able to continue we would need to explore the extent to which these concerns could be satisfactorily addressed through the examination.

Meeting the area's objectively assessed needs

78. Paragraph 11 of the Framework indicates that plans and decisions should apply a presumption in favour of sustainable development. For plan making this means that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change (a). Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.
79. Paragraph 20 of the Framework advises that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient for infrastructure for transport (b). Paragraph 104 (e) states that planning policies should provide for any large scale transport facilities that need to be located in the area (footnote 42 clarifies that examples of these include interchanges for rail freight). In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements. Additionally, paragraph 104 (c) requires planning policies to identify and protect, where there is robust evidence, sites and routes which could be critical in developing relevant infrastructure.

80. The National Policy Statement for National Networks (December 2014) (NPS) stresses the importance of SRFIs. It confirms that there is a compelling need for an expanded network of SRFIs. Paragraph 258 notes the limited number of suitable locations for SRFIs and the particular difficulties in provision to serve London and the south east.
81. As considered above, the Framework provides that planning policies should provide for any SRFIs that need to be located in the area taking into account the NPS for nationally significant infrastructure projects. SRFIs have extremely exacting locational requirements including the need for very large, unfragmented and flat sites close to the strategic rail freight and road networks and the conurbations they serve (NPS paragraph 2.45).
82. A planning application was submitted for a SRFI in Slough but refused and dismissed on appeal (a Secretary of State decision) and another in the Dartford area was also unsuccessful. Network Rail supports the creation of the SRFI in St Albans and it is clear that it has proved extremely problematic to find sites for one, especially in the south east, as recognised by the NPS. Indeed, it seems that the Radlett site in St Albans is the only realistic option and there is robust and compelling evidence to demonstrate that the SRFI needs to be located there.
83. As considered previously, in 2014 the Council was working on the basis of lower housing figures and the Broad Locations were found to be sufficient to meet the need for housing alongside the need for the SRFI, which was included in the Regulation 18 Plan as a commitment. However, in the re-evaluation of the strategy that followed, the Council did not consider whether it could continue to meet the needs of both the SRFI and the increased housing numbers or look at options as to how this could be achieved. Instead, the Council adopted an either/or position in relation to the SRFI and housing.
84. We have fundamental concerns about this approach and consider that the Council should have looked to accommodate both the SRFI and the required housing in the first instance. The requirement for the SRFI, an important piece of national infrastructure, is long established and specific to the Radlett site. Whilst the provision of housing is also an important requirement and a focus and priority recognised in the Framework, it is not fixed in location in the same way as the SRFI. In this instance there are compelling reasons to look to provide both, and we are not convinced that the two requirements should be regarded as competing.
85. Another shortcoming of the Plan's strategy is its reliance on PSGV to meet its housing requirement, given the possibility that the SRFI could proceed on the site on the basis of the existing planning permission. The site promoters indicate that development has commenced. Whilst it seems that this is disputed by the Council, notwithstanding a disagreement over the requested fee, a lawful development certificate has been submitted to deal with this matter.

86. Bringing these matters together, we consider that the Plan does not meet the development needs of the area and fails to make sufficient provision for infrastructure for transport in conflict with paragraphs 11 and 20 (b) of the Framework. Contrary to paragraph 104 (e) of the Framework, the policies in the Plan fail to provide for a large scale transport facility that needs to be located in the area (the SRFI) and have not taken into account what is a nationally important infrastructure project or had regard to the requirements of the NPS.
87. As set out at paragraph 35 of the Framework, plans must be positively prepared (criterion a). In omitting to provide for the SRFI (and in doing so to look elsewhere to meet its housing needs, either within the district or in neighbouring areas), the Plan does not provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities. Furthermore, it has not been demonstrated that the plan is deliverable over the plan period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, or that it aligns with national policy. This is at odds with paragraph 35 of the Framework which requires plans to be effective (criterion c) and consistent with national policy (criterion d).

Evidence Base

88. The Framework indicates at paragraph 31 that the preparation and review of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate, focussed tightly on supporting and justifying the policies concerned, and take into account relevant market signals. There are number of key documents missing from the evidence base.
89. There is no Heritage Impact Assessment as required by Historic England in relation to the Broad Locations. Work is still on-going with the 2019 AMR. Furthermore, it became apparent at the hearing session where we touched on the Council's reliance on windfalls as part of its housing strategy that they Council do not have the requisite historic windfall data available to support their reliance on them for future supply.
90. The Broad Locations are not supported by a Transport Impact Assessment even though it was evident from our site visits that most of them would be likely to require significant road improvements as many are currently accessed via relatively narrow roads. Hertfordshire County Council (HCC) recognises that the level of growth proposed within the Plan will require significant transport improvements at both a local and strategic level to enable to the transport network to function. This being so, HCC is concerned that there is no definitive identification of what strategic infrastructure is required to deliver the development at the proposed Broad Locations and and how that development would contribute towards any required mitigation. We share these concerns.
91. Although we understand that the Council has commissioned an updated Strategic Housing Market Assessment this has not yet been published. As

a result there is no up to date understanding of how many homes are needed and of what type, including the different sizes and types of affordable housing that may be required. Additionally, the Council rely on the brownfield register for its 10% smaller sites, but this is also not published. This list is not exhaustive, but it gives a flavour of the extent of missing documents that are critical to the examination of the Plan.

Overall Conclusions

92. In accordance with paragraph 35 of the Framework, we have assessed whether the Plan has been prepared in accordance with the legal and procedural requirements and whether it is sound. We have not been persuaded that the DtC has been satisfactorily discharged by the Council and if this is the case the failure cannot be rectified during the examination. We have also found legal compliance issues in relation to the SCI. Additionally, whilst we cannot reach a final conclusion on these matters at this stage in the examination, we have substantial soundness concerns with elements of the Plan as described above.

Next Steps

93. As set out in our letter of the 27 January 2020 and above, we will not reach an absolute or final position until you have had chance to consider and respond to this letter. However, in light of our serious concerns regarding the DtC, we consider it a very strong likelihood that there will be no other option other than that the Plan is withdrawn from examination or we write a final report recommending its non-adoption because of a failure to meet the DtC.
94. We have sought to be pragmatic in our approach to the examination but this cannot extend to ignoring a legal compliance failure with the Plan which cannot be rectified during the examination. We also appreciate how disappointed you will be with our findings but confirm that we have only come to this view following a great deal of thought and after hearing relevant evidence from both the Council and representors.
95. The Council will need some time to consider the contents of this letter and to decide on a response and we entirely understand that this may take longer than might otherwise be the case because of the current very difficult circumstances with regard to Covid 19. We are also happy to provide any necessary clarification to the Council via the Programme Officer. Responses from other parties to this letter are not invited and we do not envisage accepting them.

Louise Crosby and Elaine Worthington
Examining Inspectors

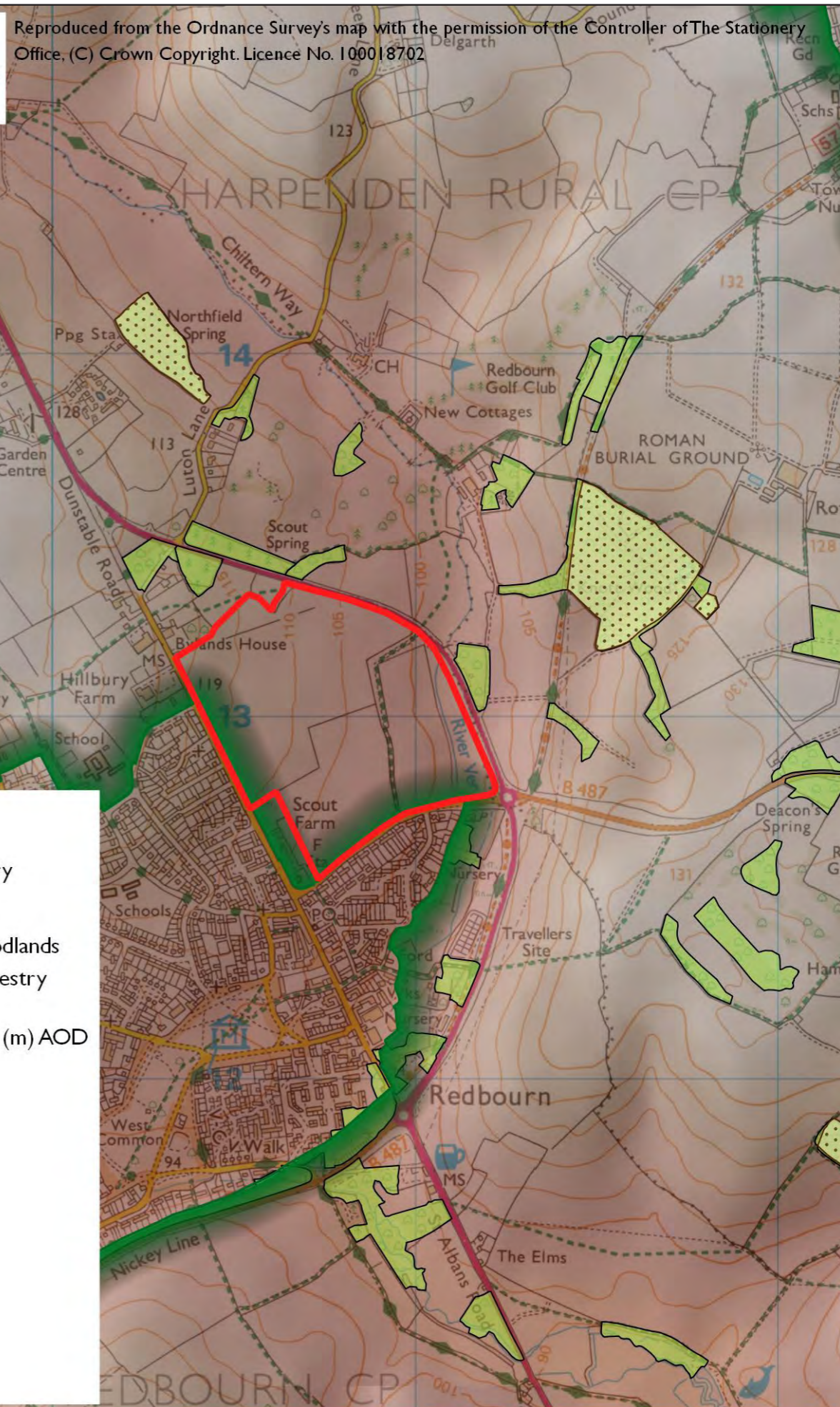
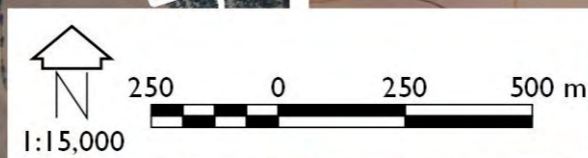
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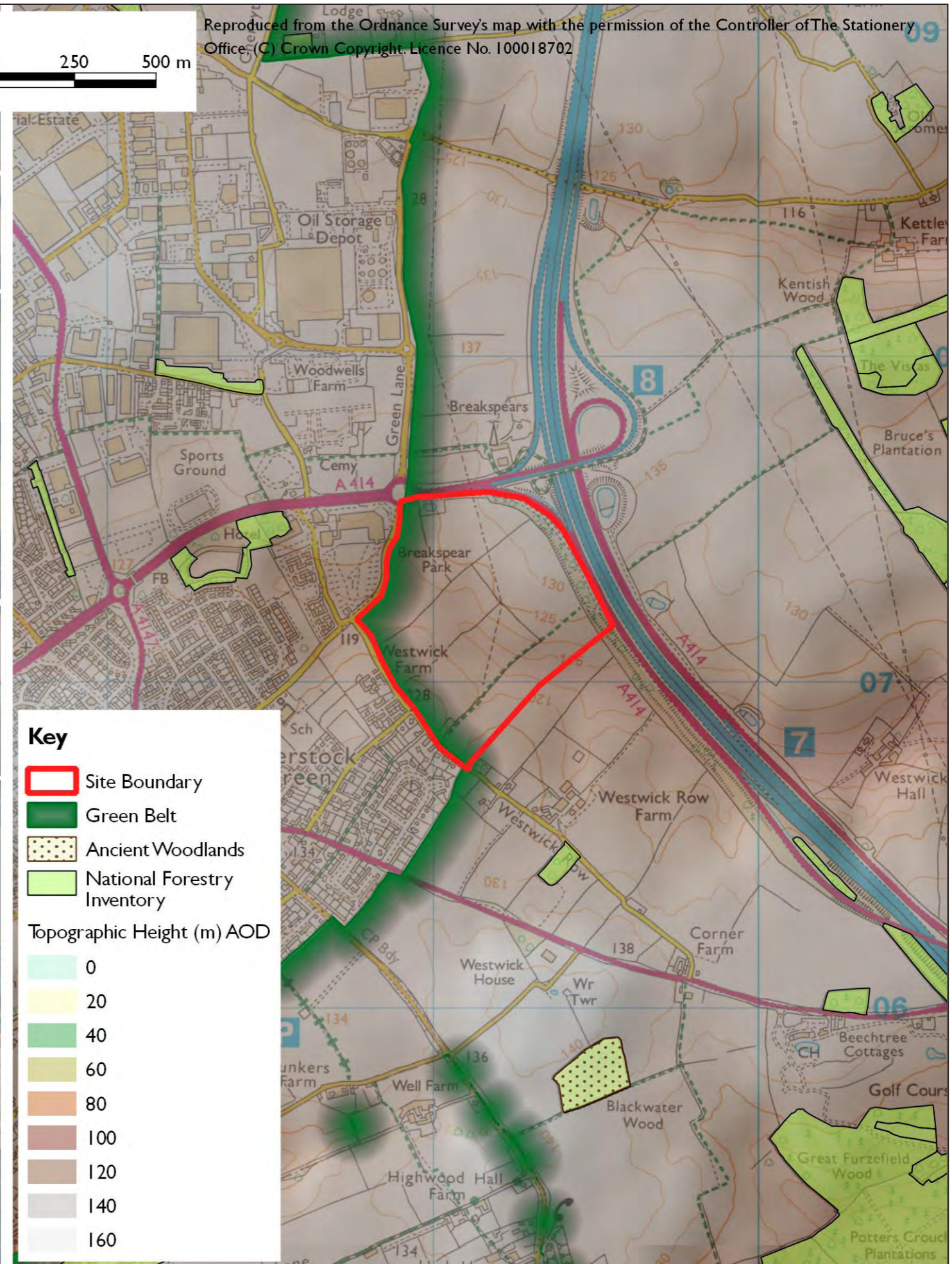
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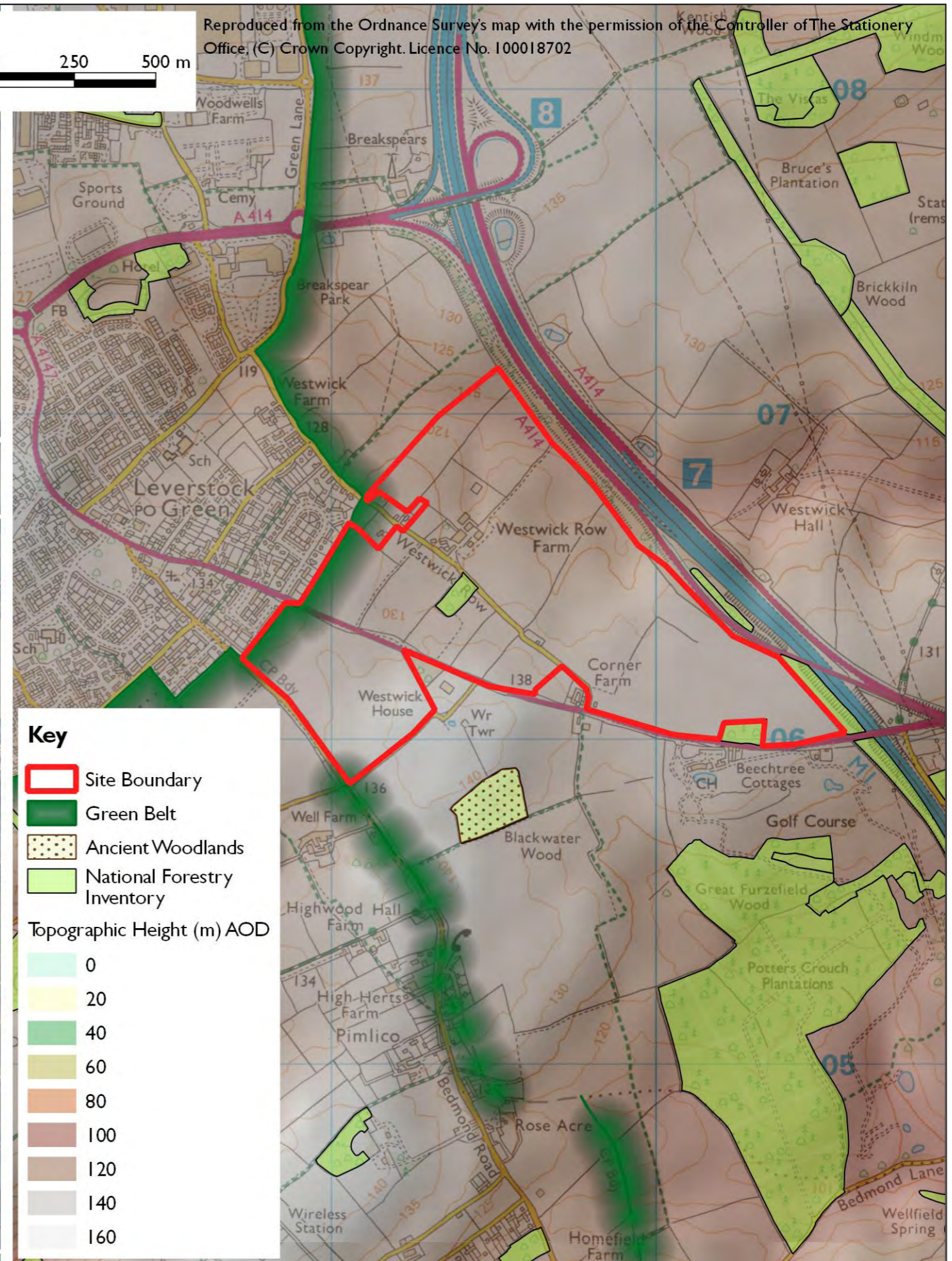
APPENDIX A - Site plans and photographs

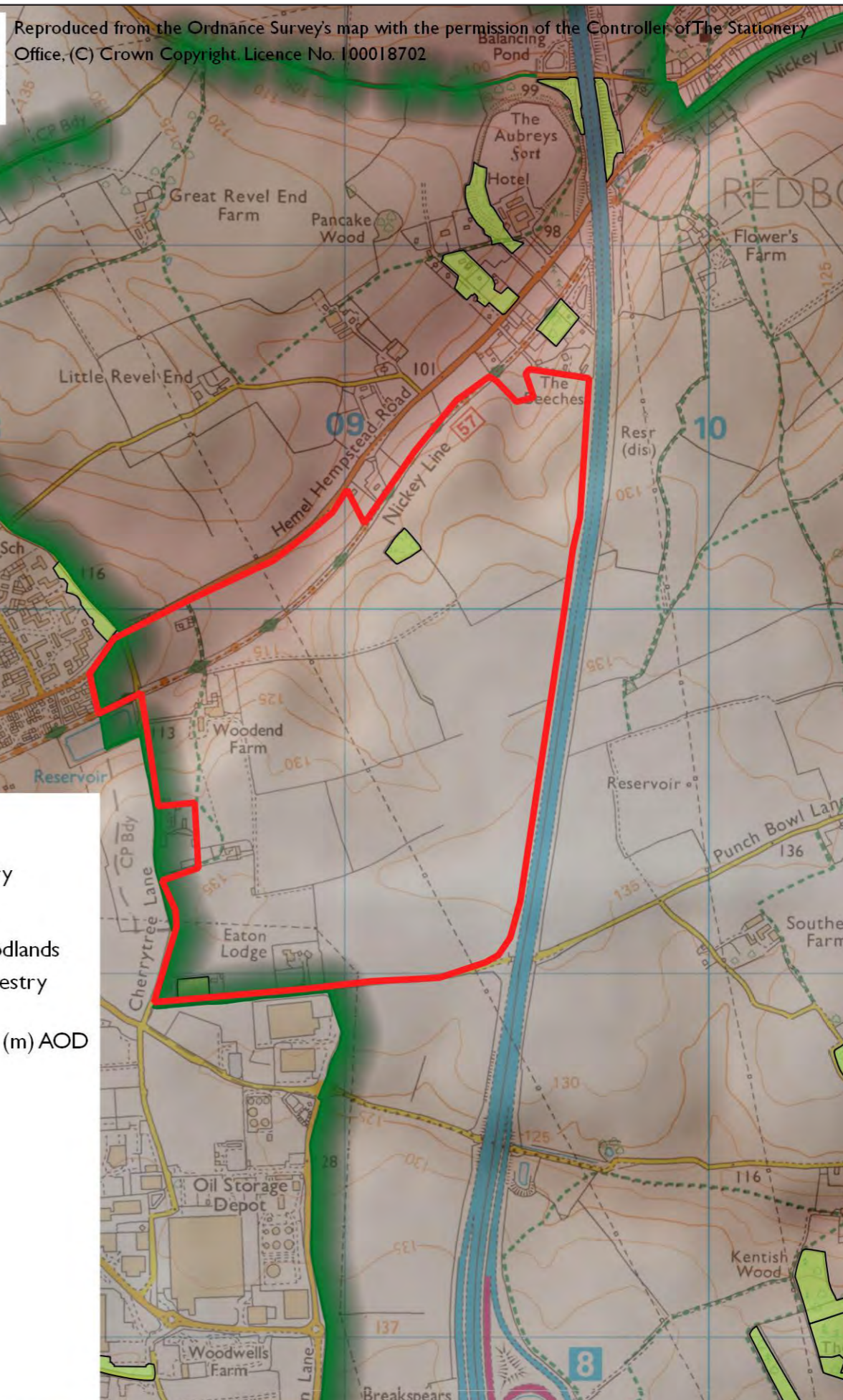
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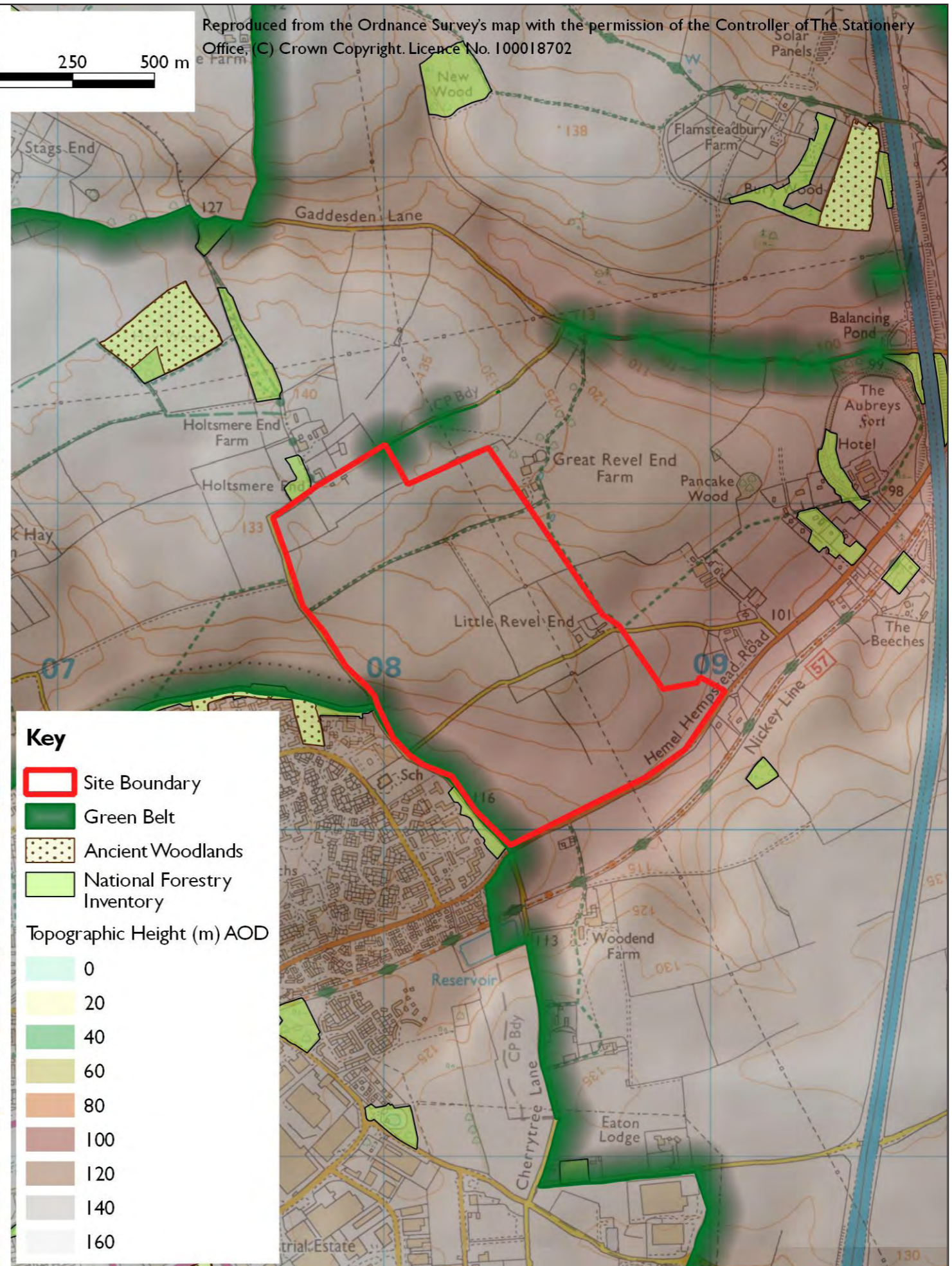
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Key

- Site Boundary
- Hertfordshire County Council Landscape Character Areas



Key

- Site Boundary
- Green Belt
- Ancient Woodlands
- National Forestry Inventory

Topographic Height (m) AOD

- 0
- 20
- 40
- 60
- 80
- 100
- 120
- 140
- 160