



Land adjacent to Verulam Golf Club London Road, St Albans

St Albans Call for Sites response 2021

Report on behalf of Beechwood Homes, Hightown Housing Association and Verulam Golf Club

**DLA Ref: 2017/306
March 2021**

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1.0 INTRODUCTION

1.1 This report has been produced by DLA Town Planning on behalf of Beechwood Homes, Hightown Housing Association and Verulam Golf Club and. It is submitted in response to the “Call for sites” undertaken by St Albans City and District Council in January 2021.

1.2 This report has been produced to aid consideration of the site through the Local Plan process. The Council is starting work on a new Local Plan and, in planning for an increased level of housing, acknowledges that Green Belt sites will be needed for housing development.

1.3 Verulam Golf Club and Beechwood Homes have been working together for a number of years to promote development on the report site. The site is surplus to the club’s requirements and is to be sold to raise money for much-needed investment in the club’s facilities – investment that will be of significant benefit to the local community, as well as the golf club itself.

1.4 This report sets out the benefits of the proposed development, the site’s unrivalled location in terms of undeveloped sites within the city, the lack of any substantive harm to the Green Belt or other planning issues that would prevent development. If the

Council is serious about prioritising walking and cycling on new developments, this site must be allocated in the Local Plan.

1.5 Moreover, development of the report site will help secure the future of the golf club, thereby retaining the presence of the golf course and the open and attractive setting that it provides for the city.

1.6 This site has previously been submitted to the Council through past Call for Sites exercises. The material now submitted in 2021 supersedes any previous submissions.

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

2.0 BACKGROUND TO VERULAM GOLF CLUB

Introduction

- 2.1 Verulam Golf Club has been at the heart of St Albans for well over a century, providing a valuable community sporting facility within easy walking distance of the City Centre for local people of all ages. The Club is a non-profit making organisation wholly owned by its playing adult membership of around 550, over 80% of whom are St Albans residents. The club employs around 30 staff on a full-time equivalent basis.
- 2.2 The club was founded in 1905 and is most famous as the home of the Ryder Cup. Samuel Ryder was the Captain when he presented the cup to the British and Irish team in the club dining room in 1927. The trophy was accompanied by a deed of trust for the competition, drawn up by another club member – an original copy of which is on display in the clubhouse.
- 2.3 Much of the green space now known as Verulam golf course was created out of land used for gravel extraction and has been maintained entirely by club revenues. The current course was laid out in 1910 by James Braid, a five-time Open Championship winner. Over the last 110 years, Verulam may have moved the odd tee or bunker, but all 18 holes today remain essentially as Braid designed them.

Proposals

- 2.4 Increased running and maintenance costs means that balancing the books is becoming ever more challenging – this is a situation facing many community golf clubs across the country. Over the last three years, 72 clubs in England have disappeared, including three locally (Potters Bar, Bushey Hall, and Bushey Golf and Country Club).
- 2.5 The club's immediate mission is to resolve this situation before it becomes too late, and thus secure the club's future for the next century. To do this the club needs to diversify the ways in which it can generate income. The only way that that can be done is by replacing the aging clubhouse with a new sustainable 'green' building with improved facilities open to all of the local community. The club needs to find a significant amount of capital investment to achieve this. Developing the land owned by the club between the car park and the London Road Business Park is the only way forward that could generate such funding without saddling the club with debts which would surely lead to its demise.
- 2.6 The income from the playing front has been exhausted and the club now needs to diversify if it is to secure its financial stability for the future.

- 2.7 The club's members will not profit from these proposals; the Articles of Association preclude the payment of dividends or distributions. Rather, all income must be spent to "promote the amateur game of golf and any other outdoor or indoor games that may be considered desirable in the area of St. Albans and community participation in the same". These proposals are wholly motivated by the need to deliver long-term economic stability, environmental sustainability and provide a community asset.
- 2.8 The course has stood the test of time, but the same cannot be said for the clubhouse. Sadly, this is becoming increasingly expensive to maintain and is towards the end of its serviceable life. Nearly half of the club's annual income comes from social and business activities in the clubhouse, without which the future of the 116 year old club would be in serious jeopardy. In short, the clubhouse is not fit for the 21st Century.
- 2.9 A new clubhouse would represent a significant opportunity to secure the club's future by changing the business model to reduce the current dependence on member subscriptions. Aside from making the club more attractive to new members and visitors, a new clubhouse could generate substantially increased income and local employment as well as reducing the overheads associated with maintaining the existing structure.

3.0 SITE & CONTEXT ANALYSIS

Location

3.1 The Verulam Golf Club site is located in the south of St Albans. London Road is situated to the east of the site, Verulam Golf Club to the south east and south west, and commercial buildings to the north. The site comprises of a broadly rectangular shaped parcel of land of some 3ha. The site is currently disused scrubland. Episodes of antisocial behaviour have occurred due to the lack of an economic use for the site. The site is shown in Figure 1 opposite.

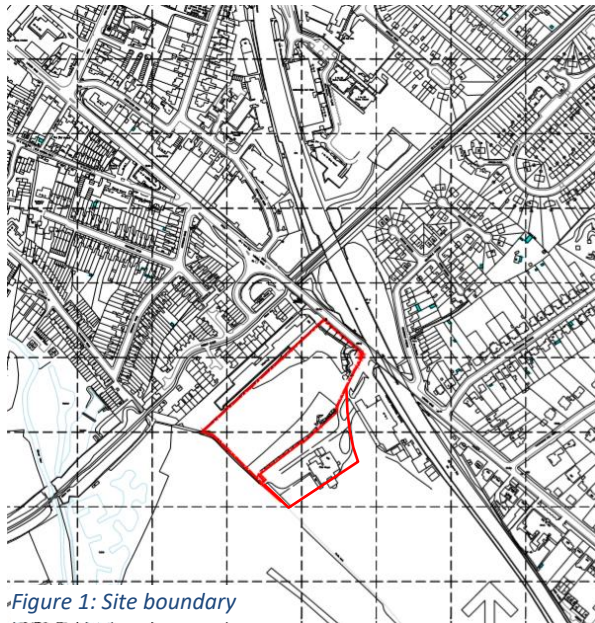


Figure 1: Site boundary

Land uses

3.2 In general terms the surrounding area is characterised by residential development as well as green open space. To the south of the Report Site is Verulam Golf Club. This comprises a clubhouse to the north, with the course to the south of the clubhouse. To the west of the site is open space comprising the Watercress Nature Reserve and the River Ver. To the north and to the east is housing, consisting of detached houses along Cunningham Avenue and semi-detached houses along Orient Close.



Figure 2: Aerial photo of the site facing north



Figure 3: Aerial photo of the site facing east

Access

- 3.3 There is existing vehicular access from London Road on the north east of the site.

Development Plan Notation

- 3.4 The Proposals Map for St Albans district shows the site located within the Green Belt, the extent of which is shown on Figure 4 below. The site also adjoins the St Albans city Conservation Area along the site's north-western and north-eastern boundaries.

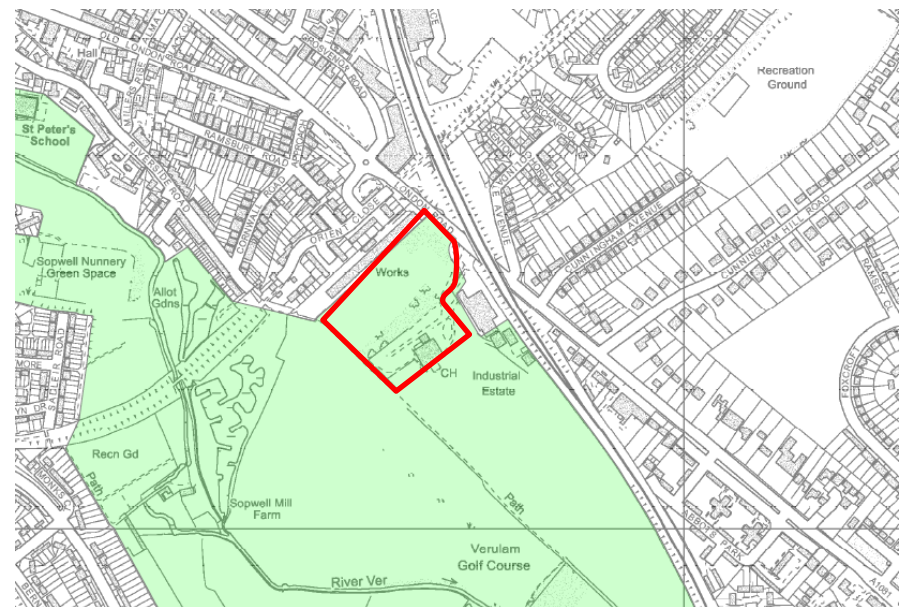
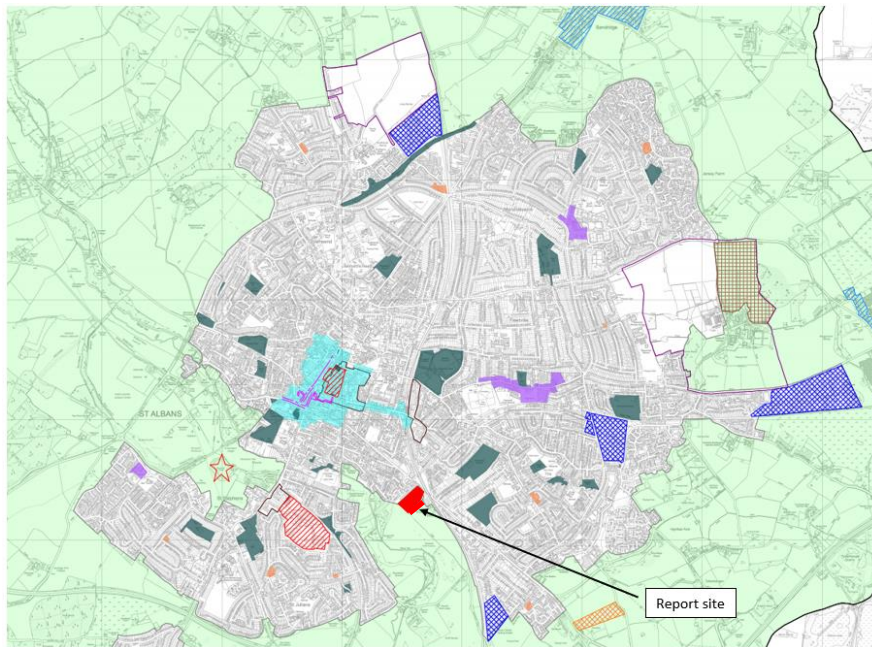


Figure 4: Existing Green Belt boundary

3.5 Figure 5 below shows an extract of the Policies Map associated with the previous draft Local Plan. The purpose is to illustrate how well the site is located in terms of proximity to the city centre.

Figure 5: Report site in city context



Local services

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

Table 3.6: Summary of Local Services (approximate measurements)

Facility	Local Provision	Proximity to site (km)
Education	St Peter's Primary School	0.9
	The Abbey C E V A Primary School	1.6
	Loreto College Secondary School	1.6
Retail	Shops on London Road	0.5
	Christopher Place Outdoor Shopping	1.2
	Sainsbury's	1.4
Health	Hatfield Road Surgery	0.3
	Maltings Pharmacy	1.6
Leisure	Victoria Dental Clinic	0.8
	Watercress Nature Reserve	0.2
	Odyssey Cinema	0.5
	St Albans City Football Club	1.3

Accessibility

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

3.8 The nearest bus stop to the site is situated on Grosvenor Road, located within 100m of the site. This bus stop is served by the number 84, 602, and 658 busses that run a regular service to nearby towns and villages, including London Colney, Shenley, Borehamwood, Hatfield, South Mimms, Potters Bar, and New Barnet.

3.9 St Albans City Railway Station is located some 0.8km to the southwest of this site, providing frequent services to St Albans, St Pancras International, Gatwick Airport and Brighton to the south and Luton Airport, Luton and Bedford to the north.

3.10 The image at figure 5 below illustrates the excellent links with both the city centre and the railway station. The Verulam Golf Club site is within a 10-minute walk of the station and just outside of a 10-minute walk of the city centre. The site also offers access to the Alban Way that runs along the old railway line, giving walkers and cyclists excellent access to Sainsburys, the Abbey Station and Westminster Lodge Swimming in one direction, and to the main City Station and Verulam secondary school in the other.

2.11 This site is arguably the best located undeveloped site in the city. There are few other development opportunities, and no other major Green Belt sites, that offer such close proximity to major facilities. This is of considerable importance given the Council's emphasis on traffic congestion issues. Residents here will have genuine choice about sustainable transport modes.

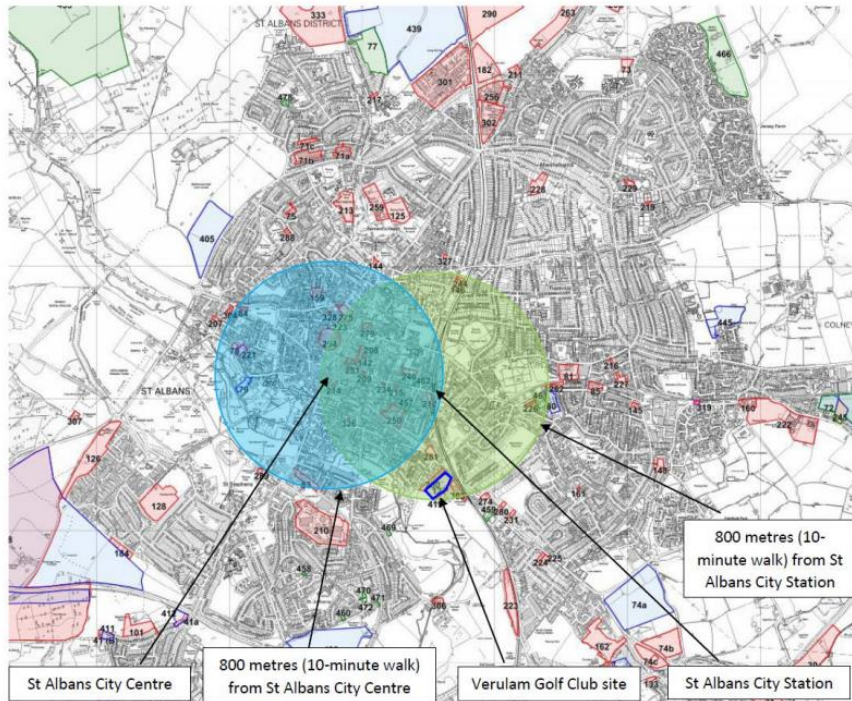


Figure 5: Approximate 10-minute walking zones around St Albans City

4.0 STRATEGIC CONTEXT

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

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

Housing need

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

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

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

The portfolio of housing sites

- 4.6 To meet housing need will require the delivery of a mixed portfolio of housing sites. A range of sizes, types and locations will be needed to enable a wide range of housebuilding organisations to contribute to meeting needs, including arrangements for self-build properties.
- 4.7 The previous focus only on strategic sites of 500 dwellings or more must change. As highlighted by the Inspectors examining the now-withdrawn draft Local Plan, and as recognised by the Council's Planning Portfolio holder, small and medium-sized sites within the Green Belt must be seriously considered. This has been reflected by the Council in the new Call for Sites pro forma, which sets the lower size threshold for sites as those capable of delivering five dwellings or more.

Green Belt considerations

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

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

4.0 PLANNING HISTORY

4.1 Site

Whilst there are no planning applications specifically for the report site, there are some for the wider golf club site, which includes the report site. These are shown in the table below:

Table 4.1: Planning history for site

LPA Reference	Proposal	Decision
5/1994/0772	Extension to changing facilities	Approved
5/1999/2353	Single storey side and rear extensions and external alterations	Approved
5/2000/1589	Erection of a 6-metre-high fence around existing practice area	Refused
5/2010/0570	Single storey outbuilding for use as a covered driving bay	Approved
5/2010/2565	Replacement irrigation system, pump house and storage house	Approved

5.0 PREVIOUS COUNCIL ASSESSMENTS

Strategic Housing Land Availability Assessment (SHLAA)

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

“This site has a significant slope and comprises vacant land to the north of the golf course, which currently has poor access. However, these constraints could be overcome (indeed there are potential access improvements to be gained for the immediate area).”

5.2 The SHLAA concluded that the site was suitable and estimated a density of 35dph across 1.7ha of the site. However, given the Council’s subsequent conclusions on the recommended density of the Broad Locations (40dph), and given the proximity of the site to services and transport options, this estimated density needs to be revisited and increased.

Draft Local Plan 2018

5.3 The pre-submission draft Local Plan that was published for consultation in October 2018 included the report site as a proposed allocation for a new primary school. Representations

were submitted on behalf of Beechwood Homes, which could be summarised as:

- The County Council’s assessment of school place need is inflated and does not reflect recent population projections.
- There is unexplored capacity within existing primary schools.
- Some of the need for new school places will be met by new schools at the Broad Locations proposed by the Council.
- There are other locations available for a new primary school, including sites owned by the County Council.
- The Verulam Golf Club site is not suitable for, nor is it deliverable as, a primary school.
- Allocating the land for a primary school would undermine the Golf Club’s plans for a new clubhouse, potentially jeopardising the club’s long-term future.

5.4 The draft Local Plan was subsequently withdrawn due to a lack of compliance with the Duty to Cooperate. Detailed allocations in the draft Local Plan were never examined by the Inspectors and the supporting evidence was not subject to scrutiny. With the withdrawal of the Local Plan, the proposed school allocation has no weight.

5.5 Moving ahead, the issues raised in representations in October 2018 remain. There is no basis for a school allocation at this site. Given its suitability for housing and the acute need for housing to

be delivered within the district the site is being promoted as a housing site.

6.0 SITE CONSTRAINTS

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

6.2 Contamination/Pollution

There are no suspected issues of contamination or pollution that would preclude development.

6.3 Environmental issues

No significant environmental constraints other than the site is located within the Green Belt. The site is also adjacent to, but outside, the St Albans Conservation Area. As the 2009 SHLAA concluded, any development would need to mitigate against any negative impact on the setting of the Conservation Area. This could be done through planting and landscaping and scheme design.

6.4 Flood risk

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

6.5 Topography

There is a sloping nature inherent to the site which provides an added opportunity for underground developments, such as parking. As such, the nature of the site's topography may increase its capacity.

6.6 Legal issues

The site is in single ownership and could be brought forward for development quickly. It is owned by Verulam Golf Club.

6.7 Access

There is existing vehicular access from London Road on the north east of the site.

7.0 OUTLINE OF PROPOSAL

7.1 The proposal is essentially in two parts but a single Local Plan allocation is proposed that would allow the replacement of the existing clubhouse and the proposed residential development on vacant land alongside. The new Green Belt boundary is proposed to run around the outside of the residential development site, leaving the existing club house and the site of the proposed club house within the Green Belt (see figure 6). If the Council would prefer to exclude the club house from the Green Belt then a new boundary could be established on this basis.

New Clubhouse and Community Facilities

7.2 The need for the new clubhouse is set out above. The replacement clubhouse will provide much-improved facilities to help underpin the sustainability of the club in the long-term. The club's vision is for a new building constructed to high environmental and sustainability standards. As well as the golf provision, the new clubhouse will also contain:

- A much-needed adaptable local venue for social functions and corporate events of up to 200 people within 0.5m of the mainline station and its 23-minute travel time from Central London. The income generated from this will help to underpin the club's finances and also provide a resource for the local community.

Figure 6: site proposals



- Café – a redeveloped clubhouse is an opportunity to rationalise the space and create a more visitor-friendly experience. The club's vision is for an accessible café/bar area that will be easier to access and more appealing to the wider community.
- A museum dedicated to the Ryder Cup (to be done in consultation with the local museum and form part of the St Albans tourist agenda). The link with this iconic feature of the golf landscape will be strengthened and will help promote tourism into the city.

- A Ryder Academy of Golf which would provide golf tuition open to the public with an emphasis on developing our current work with local schools.
- Improving the club's community facilities will create additional jobs and enable the club to grow its apprenticeships programme for young people. Verulam is the first golf club to be accepted into the new Kick Start initiative.

Benefits of development

7.3 This investment in the club's facilities will not only benefit the club itself but also helps the club to widen its appeal and make itself more accessible to the local community. The club already works with local schools to promote golf as a form of healthy exercise and the new facilities will provide specific facilities for youth golf and help to develop this side of the club's activities.

7.4 In addition to delivering a new clubhouse, the funding released by sale of the land beyond the car park for development would enable the club to accelerate its environmental aspirations by:

- Investing in electric greenkeeping machinery, reducing both air and noise pollution.
- Constructing a reservoir to store rainwater captured from the new clubhouse and elsewhere on the course to reduce the burden on local mains water supplies.
- Increasing planting of indigenous tree species around the course.
- Preserving a piece of history associated with the city.
- Providing the city and surrounding area with a community asset.

Proposed residential development

7.5 The site lends itself to a variety of development options. As set out at Figure 5 above, the site is within easy walking distance of the station and the city centre and is arguably the best located undeveloped site in the city. There are few other development opportunities, and no other major Green Belt sites, that offer such close proximity to major facilities. The County Council's approach to transport planning set out in LTP4 is to prioritise walking and cycling as sustainable modes of transport. If that is the key concern, then there is no question that this site should be allocated for development in the Local Plan – it is simply too well located to leave in the Green Belt.

- 7.6 The site offers easy access to high-quality broadband infrastructure – a feature that has become critical during the period of homeworking arising from the COVID-19 pandemic. In addition, Beechwood will be providing home office areas in the new homes proposed on site to facilitate homeworking.
- 7.7 As illustrated in the aerial photographs above, the site is adjacent to two industrial areas, one to the north-west and one to the east. We understand there are redevelopment proposals for both of these sites currently under consideration which, if implemented, would further reduce the Green Belt role played by this site. The site also benefits from a strong tree screen along the London Road frontage and the western boundary to the golf course, which limits any landscape impact.
- 7.8 The site's excellent location and the varying topography would suit a relatively high-density development, with density reducing towards the back of the site as development blends into the golf course and Green Belt beyond. Currently the site frontage along London Road into St Albans offers poor visual presence and could be vastly improved as a focal entrance point into the city centre.
- 7.9 The development does not interfere with the public right of way that runs along the western boundary of the site. The site is currently disused and failing to find an economic use for the site

could lead to it becoming a target for antisocial activity. Episodes of fly-tipping have occurred in the past.

- 7.10 The site is able deliver over 100 units, in the form of houses and apartments. This makes an important contribution to the housing numbers required by the council, and one which is able to be delivered quickly and in a sustainable location within St Albans.
- 7.11 The Council is placing an emphasis on Neighbourhood Plans to deliver an element of housing provision. However, since there is no town or parish council for the St Albans area, there is no obvious body to take forward a Neighbourhood Plan for the city. No other Neighbourhood Forum has come forward to undertake a Neighbourhood Plan. On this basis, the allocation of nonstrategic sites that might be undertaken through a Neighbourhood Plan in other parts of the district may not happen around St Albans. It would be perverse if the most sustainable settlement in the district is not able to plan for non-strategic sites, simply because of an administrative quirk. The Local Plan will therefore need to play a greater role in allocating nonstrategic sites around the city of St Albans.

CONCEPT SCHEME A



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Figure 7: Indicative development layout



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8.0 GREEN BELT IMPACT

- 8.1 The Council published a Green Belt review by consultants, SKM, in 2013 as part of work on the then Strategic Local Plan. The Strategic Local Plan was withdrawn in 2016 and work begun on a new Local Plan, which drew on the findings of the 2013 Green Belt Review. This new Local Plan was withdrawn in 2020 and a new Local Plan process has now started. As set out above, the 2013 SKM work is not sufficient to base a new Local Plan on and the Council has commissioned a new Green Belt Review.
- 8.2 The SKM Review included this site within a large area of land south of St Albans, defined as area 30 and shown in figure 8 below. The total area is around 347ha in size and almost 4km in length. The Green Belt assessment described the contribution of the entire parcel as follows: “Significant contribution towards safeguarding the countryside, preserving the setting of Sopwell and St Albans, and maintaining the existing settlement pattern (providing gaps between St Albans and Park Street / Frogmore). Partial contribution towards preventing merging. Overall, the parcel contributes significantly to 3 of the 5 purposes.”
- 8.3 However, there is no more fine-grained analysis of the contribution of individual pieces of land within this wider parcel

– one of the key criticisms of the SKM work raised by the Inspectors on the last draft Local Plan.

- 8.4 Beechwood Homes commissioned CSA Environmental to undertake a Landscape and Visual Assessment of the site in 2012. This Assessment considered the contribution of the site to Green Belt purposes and concluded:

“...development can be accommodated without impacting on the objectives of the Metropolitan Green Belt, as it is well related to the existing urban area; has clearly defined boundaries; will not result in urban sprawl or coalescence; and, will not impact on the open character of the adjoining landscape.”

- 8.5 To help inform the Council’s new Green Belt Review in respect of the report site, the contribution the report site makes to each of the five Green Belt purposes listed in paragraph 134 of the NPPF is set out below. The findings are informed by the SKM Review and the CSA work.

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

- 8.6 The SKM Review concluded that St Albans was not one of the “large built-up areas” to which this purpose applies. For this reason the wider parcel of land within which the report site sits

was considered by SKM to make “limited/no contribution” to this purpose. In respect of the report site itself, the contribution to this purpose would be even less. Whilst the proposed development would extend the built-up area of this part of St Albans, it is tightly constrained on three of the four site boundaries and is not considered to represent ‘unrestricted sprawl’.

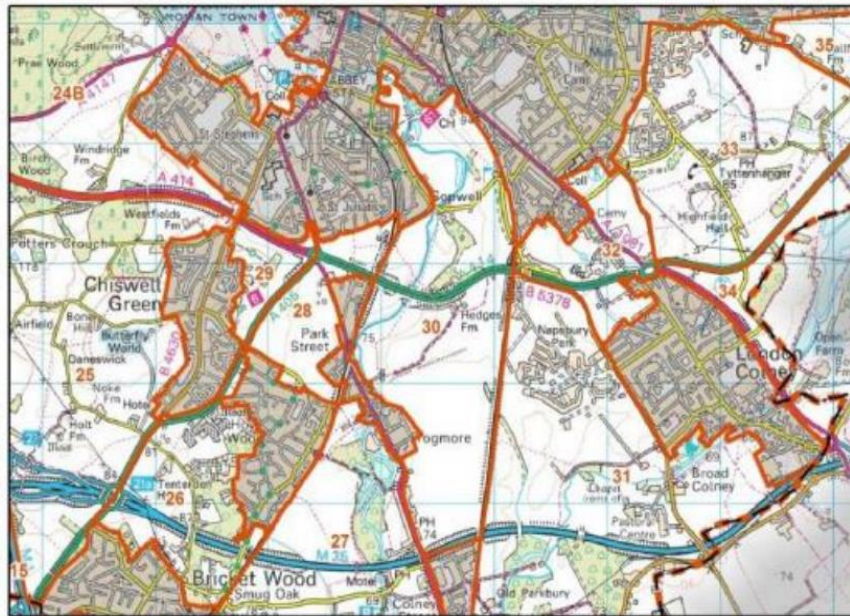


Figure 8: Green Belt Review, Parcel 30

Purpose 2- to prevent neighbouring towns merging into one another

8.7 The SKM Review concluded a “partial” contribution to this purpose from the whole of Parcel 30. In respect of the report site itself, the level of containment and surrounding development means it makes no contribution to preventing coalescence between towns.

Purpose 3 - to assist in safeguarding the countryside from encroachment

8.8 The Council’s Green Belt assessment contained no specific assessment of the contribution of individual pieces of land within the wider parcel. While the wider 347ha parcel of land was considered to make a “significant contribution” to safeguarding the countryside, it is difficult to see how the report site itself makes any form of contribution, let alone a significant contribution, to safeguarding the countryside.

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

- 8.9 The SKM review concluded that *“The parcel contains Sopwell Conservation area. Most significantly it also provides open and historic setting to the Cathedral and Abbey Church of St Alban providing views to and from the countryside.”* Parcel 30 was given a “significant” contribution to purpose 4.
- 8.10 While the report site itself is undeveloped, it is not considered to represent an “open and historic setting” to the Cathedral and Abbey Church. While a detailed assessment will be required of the proposed development scheme on the city skyline and setting, the contribution the site makes to this purpose is less than significant.
- 8.11 Furthermore, it is the presence of the golf club that helps to secure the “open and historic setting” to the city. As set out above, allocation of the report site will help to secure the future of the golf club and help avoid a situation where the golf course falls into disuse and becomes subject to redevelopment proposals, as has happened elsewhere (at Potters Bar Golf Club, for example, which is now proposed as a housing site). The extent of the golf course is outlined in blue on Figure 9 opposite.

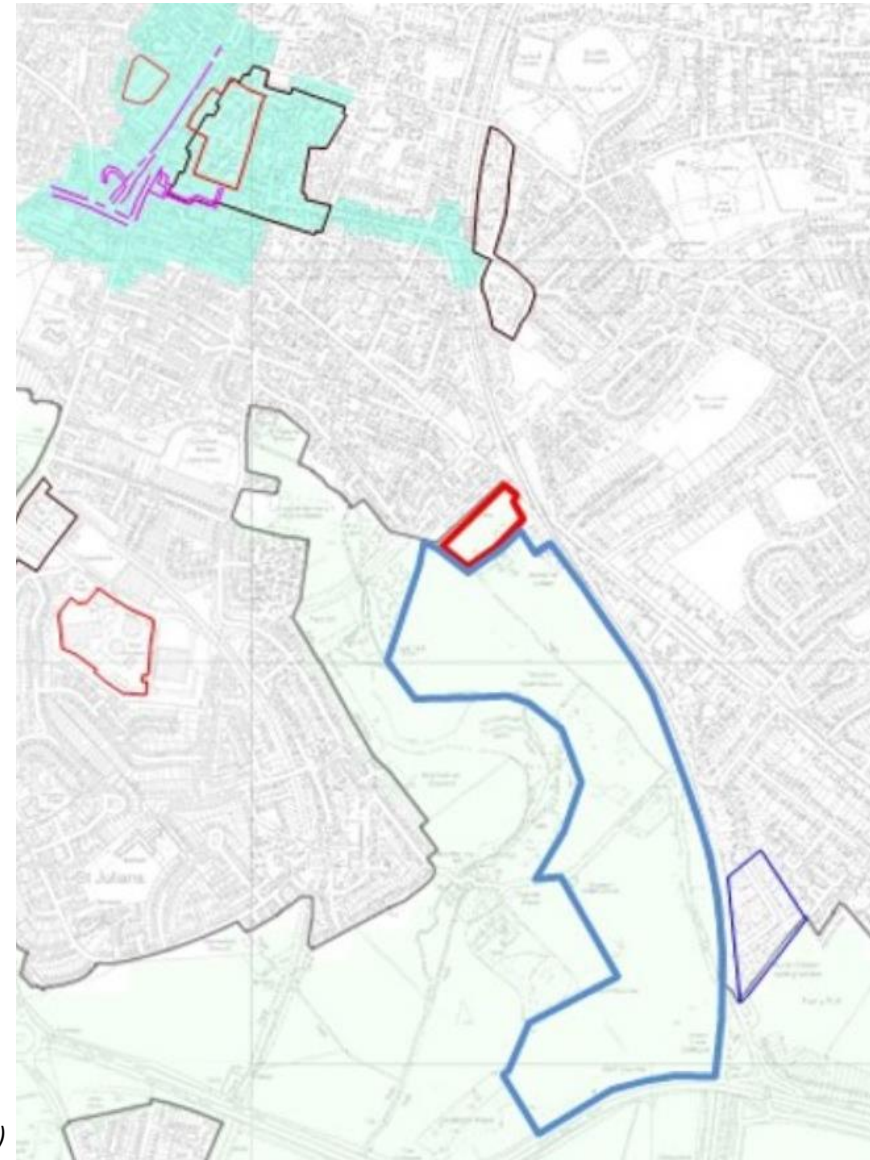


Figure 9: extent of Verulam Golf Course (in blue)

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

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

Summary of harm to Green Belt

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

- The site is a discrete piece of land and the remaining golf course land could continue as Green Belt unaffected.
- The site makes no contribution to keeping towns apart.

- The site is surrounded on three sides by built development and contributes little to any of the Green Belt purposes.
- Development of the report site will help secure the future of the golf club, thereby retaining the presence of the golf course and the open and attractive setting that that provides for the city.

New position of Green Belt boundary

8.14 An alternative Green Belt boundary has been illustrated below in Figure 10. The western boundary is formed by the clear boundary line between the site and the golf course, which also coincides with a Public Footpath route. The southern boundary would run alongside the golf club car park to where it meets with the existing employment use. If the Council would prefer to exclude the club house from the Green Belt then a new boundary could be established on this basis.

Figure 10: Existing and Proposed Green Belt Boundaries



9.0 DELIVERABILITY

9.1 The site comprises of a broadly rectangular shaped parcel of land of some 3ha and as such could be brought forward for development quickly. Based on the February 2018 Call for Sites report, as part of the exceptional circumstances needed to justify removal of the site from the Green Belt, the quick deliverance of housing was mentioned. The past emphasis in the emerging Local Plan on large strategic sites could have led to a delay-prone housing land supply. The addition of smaller sites such as the Verulam Golf Club site would add robustness and resilience to the housing land supply.

Landownership

9.2 The land is owned by Verulam Golf Club, and despite the 2018 prospective allocation for a primary school on the site, this land is being put forward for housing, and not for educational use.

9.3 Development of the Verulam Golf Club site would have substantial benefits such as income generated from the sale of the land would be used to fund a replacement clubhouse, which will provide much-improved facilities to help underpin the sustainability of the club in the long-term. This investment in the club's facilities will not only benefit the club itself but also helps the club to widen its appeal and make itself more accessible to

the local community. Previous assessments of the site by the Council have shown that the site is suitable for development and is well-located, as discussed above in Section 5.0.

10.0 CONCLUSIONS

10.1 The Council acknowledges that the scale of housing need is higher than has previously been planned for and is higher than can be accommodated within the built-up area. As such, additional sites will be needed. It is also clear that the Neighbourhood Plan route appears unlikely for the city of St Albans and that therefore the Local Plan will need to play a greater role in allocating non-strategic sites than it might in other parts of the district where Neighbourhood Plans exist.

10.2 The land adjacent to Verulam Golf Club is arguably the best located undeveloped site in the city of St Albans. It benefits from a proximity to the city centre and the railway station unmatched by any substantial Green Belt site. It is therefore suitable for a high-density residential development.

10.3 The site could make a meaningful contribution to housing need in the district. The Partnership between Beechwood Homes and Hightown Housing Association will deliver substantial affordable housing and, in particular, genuinely affordable housing that is highly unlikely to be provided on non-Green Belt sites for viability reasons.

10.4 The site plays a very minor role in terms of the purposes of the Green Belt and could be released without harming the function of the remaining Green Belt land. There are no other planning constraints that would prevent development. If the Council is serious about prioritising walking and cycling on new developments, this site must be allocated in the Local Plan.

10.5 The exceptional circumstances needed to justify removal of the site from the Green Belt include the following:

- Housing provision, which could be delivered quickly
- Affordable housing provision
- Improved golf club facilities available to the wider community
- Local economic benefits
- Highway improvements

10.6 Moreover, development of the report site will help secure the future of the golf club, thereby retaining the presence of the golf course and the open and attractive setting that it provides for the city.

Date: May 2012

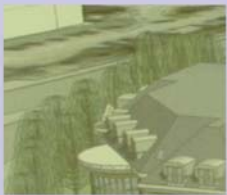
Land at Verulam Golf
Club,
St. Albans,
Hertfordshire

Ecological Appraisal

Prepared by
CSa Environmental Planning

On behalf of
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Report No: CSa/1960/01



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Appendices

Appendix A: Magic Database Site Check Report and Plan

Appendix B: Data Search Response from HBRC

Appendix C: Habitats Plan CSa/1960/100

1.0 INTRODUCTION

- 1.1 This report has been prepared by CSa Environmental Planning on behalf of Beechwood Homes Limited. It sets out the findings of an Ecological Appraisal of Land at Verulam Golf Club, St.Albans, Hertfordshire (referred to herein as the 'Site'). The report has been prepared to inform proposals for residential development at the Site.
- 1.2 This ecological appraisal aims to:
- undertake a desktop search for relevant biological records and assess their significance;
 - review the site in relation to its wider ecological context;
 - describe and map the habitats present at the site;
 - identify any potential protected or notable species issues;
 - assess potential impacts, and
 - recommend appropriate mitigation and biodiversity enhancement measures.
- 1.3 This report presents the ecological appraisal information in a standard format accepted by ecological consultees across the country, adopting various best-practice procedures and methodologies.
- 1.4 The application area comprises semi-improved grassland with encroaching shrub, tall ruderal and woodland areas.

2.0 METHODOLOGY

Desktop Biological Records Search

- 2.1 The Multi-Agency Geographic Information for the Countryside ('MAGIC') online database was searched, looking for all relevant statutory sites within 5km of this development site, the results of which are provided within Appendix A.
- 2.2 A biological records search was also conducted for the area of land encompassing the proposed Site and adjacent land within approximately 1km (note: some data has been provided in up to 1.5km from the Site). Hertfordshire Biodiversity Records Centre ('HBRC') was contacted for records of non-statutorily designated wildlife sites and protected/notable species. The results of the record search are discussed within the report where appropriate, with full details and maps provided within Appendix B.

Site Survey

- 2.3 The site was visited on 03 May 2012 by Jamie Woollam MIEEM in order to undertake an 'extended Phase 1' survey of the site. This survey is at a level intermediate between the Phase 1¹ survey (where standardised habitat mapping is undertaken together with making notes on dominant and notable species) and the more detailed (Phase 2) survey techniques that may be used to specifically record or survey particular habitats or species.
- 2.4 In this survey, the more obvious plant species observed within each habitat type are recorded and habitats are classified and mapped. Note is also taken of the more conspicuous fauna present during the survey, with particular attention paid to any evidence of, or potential for, the presence of protected or notable species.
- 2.5 The habitats present within the application area are illustrated on the Habitats Plan (CSa/1960/100) in Appendix C.

Evaluation and Assessment

- 2.6 Ecological features are evaluated using the Guidelines for Ecological Impact Assessment 2006, produced by the Institute of Ecology and Environmental Management². These guidelines promote a more scientifically rigorous and transparent approach to the ecological assessment process. This

¹ Nature Conservancy Council. 1990 *Handbook for Phase 1 habitat survey – a technique for environmental audit*. JNCC, Peterborough.

² IEEM (Institute of Ecology and Environmental Management). (2006). *Guidelines for Ecological Impact Assessment (EclA)* – June 2006.

methodology provides a standardised approach, formulated from the views of a wide spectrum of ecological professionals.

2.7 The process of valuing ecological features and resources is complex and subjective. A number of factors need to be taken into account when applying professional judgement to value ecological features. These include the following:

- designated sites and features;
- hedgerow regulations;
- biodiversity value;
- potential value;
- secondary or supportive value;
- social/community value;
- economic value;
- legal issues, and
- multi-functional features.

2.8 Legal protection needs to be considered separately from value. Our assessment and reporting will highlight legal issues and the appropriate mechanism for dealing with any such constraint. However not all legally protected species are rare (e.g. badgers) so legal requirements and ecological value are separate considerations.

Geographic Frame of Reference

2.9 In assigning value to an ecological feature/ resource the following geographic frame of reference should be used:

- international;
- national (i.e. England/Northern Ireland/Scotland/Wales);
- regional;
- county (or metropolitan e.g. in London);
- district (or unitary authority or borough);
- local or parish, and
- within zone of influence only (which might be the project site or a larger area).

2.10 The size, conservation status and the quality of features or species are all relevant in determining value. Furthermore the value of a species and/ or habitat may vary depending on its geographical location.

Legislation and Guidance

2.11 There are several pieces of legislation relating to wildlife and biodiversity. The pieces of legislation which are of particular relevance to ecology and development are the Wildlife and Countryside Act 1981 (as amended), the

Conservation of Habitats and Species Regulations 2010 and the Protection of Badgers Act 1992. These pieces of legislation and the species and habitats they afford protection to have been given significant consideration in the production of this report. In addition, Biodiversity Action Plans, the Natural Environment and Rural Communities Act 2006 and the National Planning Policy Framework are also of particular relevance to ecology and development as discussed below.

Biodiversity Action Plans

- 2.12 The UK Biodiversity Action Plan ('BAP') is the UK Government's response to the International convention on biological Diversity which was signed in 1992. The main objectives of the Convention are to conserve biodiversity, to use biodiversity in a sustainable fashion and to share the benefits of biodiversity fairly and equitably. The BAP describes the UK's biological resources and commits a detailed plan for the protection of these resources through the identification of 1150 species and 65 habitats that are listed as priorities for conservation action.
- 2.13 The Hertfordshire BAP works on the basis of partnerships between local nature conservation organisations to agree local conservation priorities and to determine the contribution they can make to the delivery of the national BAP targets.

Natural Environment and Rural Communities Act 2006

- 2.14 Natural Environment and Rural Communities ('NERC') Act 2006 reinforces the status of BAP species and habitats. The UK BAP list has been used by the Secretary of State to draw up the species and habitats of principal importance in England under Section 41 ('S41') of the NERC Act. This S41 list includes 56 habitats and 943 species which are the species/habitats found in England which have been identified as requiring action under the UK BAP. By way of example, habitats of principal importance within the list include Arable Field Margins, Traditional Orchards, Hedgerows, Ponds and Rivers.
- 2.15 This legislation makes it clear that Local Planning Authorities should consider impacts to biodiversity when determining planning applications, with particular regard to UK BAP/S41 List of species and habitats, even where they are not covered by other legislation.

National Planning Policy Framework

- 2.16 The National Planning Policy Framework ('NPPF')³, published in March 2012, sets out the Government's planning policies for England and how they should be applied. Chapter 11 'Conserving and enhancing the natural environment' sets out the Government's policies on biodiversity, landscape and geological

³ Department for Communities and Local Government (2012) National Planning Policy Framework (Internet) Available from www.communities.gov.uk /Accessed 2012

conservation. In summary, with regards to ecology and biodiversity, the NPPF requires that the planning system and planning policies should:

- minimise impacts on biodiversity and provide net gains in biodiversity where possible;
- recognise the wider benefits of ecosystem services;
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets;
- explore and encourage opportunities to incorporate biodiversity in and around developments;
- refuse planning permission if significant harm cannot be avoided, adequately mitigated, or, as a last resort, compensated for;
- planning permission should not normally be permitted where proposed development on land within or outside a Site of Special Scientific Interest (SSSI) would likely to have an adverse effect on the SSSI (either individually or in combination with other developments), and
- refuse planning permission if development will result in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

2.17 The presumption in favour of sustainable development, included within the NPPF (Paragraph 14), does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. This is relevant to developments that could have a significant effect on European sites i.e. Special Areas of Conservation ('SACs') and Special Protection Areas ('SPAs'). The following wildlife sites should be given the same protection as European sites:

- potential SPAs and possible SACs;
- listed or proposed Ramsar sites, and
- sites identified, or required, as compensatory measures for adverse effects on European sites, potential SPAs, possible SACs, and listed or proposed Ramsar sites.

2.19 The Government Circular 06/2005⁴, which is referred to in the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. This guidance remains relevant and applicable.

⁴ Office of the Deputy Prime Minister (2005) Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within The Planning System (Internet) Available from <http://www.communities.gov.uk/documents/planningandbuilding/pdf/147570.pdf> /Accessed 2012

3.0 RESULTS AND EVALUATION

Site Location

- 3.1 The Site is located just over 1km southwest of St. Albans town centre to the north Verulam Golf Course. The Site lies to the southwest of London Road and north of the clubhouse and car park serving Verulam Golf Club. To the northwest of the Site is an old railway works building currently being used as light industrial units, with residential dwellings and disused railway beyond. The River Ver with associated fishing lakes and Local Nature Reserve (former watercress beds) are present to the west. The main railway route through St Albans is located c.10 metres northeast of the Site.

Designated Sites

Statutory Sites

- 3.2 The MAGIC database search (see Appendix A) has revealed that no statutory wildlife site designations cover any part of the proposed development Site or adjacent land.
- 3.3 One Site of Special Scientific Interest ('SSSI'), Moor Hill Quarry, West SSSI, occurs within 5km of the Site, and is located c.3.7km south-west of the Site at its closest point. However, this site is designated for geological interest only.
- 3.4 Three Local Nature Reserves ('LNRs') occur within 5km of the Site. Further details on each designation for the Site are provided below:

Table 1: Local Nature Reserves with 5km of the Land at Verulam Golf Club Site

Local Nature Reserve Name	Approximate Distance/ Heading from Site	Description
Watercress Wildlife Site	<0.1km West	This former watercress bed associated with the River Verr comprises rough grass meadows, ponds, wetlands, orchards and a small woodland. The site supports a range of species including wetland and garden birds, birds, grass snakes and slow worms.
Colney Heath	2.1km Northeast	This site remnant heath site includes shrubland and wetland habitats, and is home to many a range of associated species.
The Wick Wood	4.0km East	A 3ha area of semi-natural ancient woodland with unrestricted public access.

Non-Statutory Sites

- 3.5 HBRC have confirmed that no non-statutory cover any part of the Site. However, nine Wildlife Sites have been identified within 1km of the Site.

Table 2: (Non-statutory) 'Wildlife Sites' with 1.5km of Land at Verulam Golf Club Site

Wildlife Site Name (Reference)	Approximate Distance/ Heading from Site	Description	Wildlife Site Selection Criteria
Sopwell House Watercress Beds	<0.1km West	See Watercress Wildlife Site LNR above.	Species
Smallford Trail/Alban Way	<0.1km North	Dismantled railway route used as a public path/bridleway. The site is predominantly lined with secondary broadleaved woodland and scrub, including some very old coppiced specimens, with remnant areas of grass and tall herbs, mainly along the edges of the path in the east.	Old secondary woodland with a semi-natural canopy and varied structure; >2 ha; woodland indicators; grassland indicators.
Sadleir Road Allotments	0.2km West	Site important for protected species	Species
Shirley Road Allotments	0.4km North	Site important for protected species: slow worm	Species
Sopwell Meadows	0.4km South	Alluvial pastures with spring sources along the valley of the River Ver supporting areas of dry semi-improved neutral grassland, species-rich unimproved wet marshy grassland, swamp and fen, and areas of open water. The site is tending towards taller, ranker vegetation due to lack of management. Scattered scrub borders the southern edge and along the old ditch lines. Water vole has been recorded along the river and the site is generally important for a range of invertebrates and birds.	Grassland indicators; fen and swamp indicators.
Cottonmill Lane Allotments	0.5km West	Site important for protected species: slow worm	Species
Ver Valley Meadows	0.8km South	A series of old mainly unimproved meadows along the valley of the River Ver supporting predominantly neutral grassland but with more acid communities on areas of higher ground. The grassland varies from damp to very wet, with marshy grass and rarer swamp/fen vegetation present in lower lying areas.	Grassland indicators
North Orbital Fields	1.2km Southeast	Fields supporting semi-improved neutral grassland with much invading scrub. The grassland supports a rough sward with a reasonable mix of fine and taller grasses and herbs.	Grassland indicators
Birklands Fields	1.5km Southeast	Semi-improved neutral grassland supporting a good diversity of indicator species.	Grassland indicators

3.6 The Site was surveyed in 1985 by HBRC, and recorded as an *Ecology Database Site*. The Site does not appear to have been under consideration for (non-statutory) wildlife site status. The Site ("Grassland and Scrub North of Verulum Golf Club") was described as being an "area of old rough neutral/slightly calcareous grassland with ant hills and Oak/Hawthorn scrub". Species recorded at the time included agrimony *Agrimonia eupatoria*,

common vetch *Vicia sativa*, tufted vetch *Vicia cracca*, knapweed *Centaurea nigra*, meadow buttercup *Ranunculus acris*, meadow vetchling *Lathyrus pratensis*, and field scabious *Knautia arvensis*.

General Site Description

- 3.7 This approximately 2ha Site comprises an old grassland area with encroaching scrub and trees, and with mature wooded banks to the north and east. The Site slopes very steeply from the north eastern boundary and more gently from the south eastern boundary, with the majority of the Site being broadly flat. A public footpath runs along the southwest boundary of the Site.
- 3.8 The habitats present within the Site are illustrated on the Habitats Plan (CSa/1960/100) in Appendix C.

Habitats

Species-poor semi-improved grassland

- 3.9 The central swathe of the Site includes semi-improved grassland which appears to be in decline. This is likely to have occurred due to lack of management, improvement of nutrient content and lack of scrub control. For ease of description, the grassland is divided into three areas: 'G1', 'G2' and 'G3'.
- 3.10 G1 to the north of the Site has been heavily rabbit grazed along with significant scrub encroachment. As such, grassland species recorded were very limited and included cropped grasses, ground-ivy *Glechoma hederacea*, clover species *Trifolium* sp., yarrow *Achillea millefolium* and greater plantain *Plantago major*. Agrimony and tufted vetch were noted at a single location.
- 3.11 G2 to the centre of the Site comprises more rank grassland of false oat-grass *Arrhenatherum elatius*, perennial rye-grass *Lolium perenne*, red fescue *Festuca rubra*, lesser celandine *Ranunculus ficaria*, ragwort *Senecio jacobaea*, creeping buttercup *R. repens*, teasel *Dipsacus fullonum*, dandelion *Taraxacum officinale* agg. and creeping thistle *Cirsium arvense*.
- 3.12 G3 to the south of the Site comprises a tussocky grassland area dominated by false oat-grass with species as G2.

Broadleaved Woodland and Trees

- 3.13 The northeast and southeast areas of the Site include two areas of broadleaved woodland. For ease of description the two areas are divided into 'W1' and 'W2'.

- 3.14 W1 to the northeast of the Site is situated on a steep, irregularly contoured bank with a canopy of mature pedunculate oak *Quercus robur*, ash *Fraxinus excelsior* and sycamore *Acer pseudoplatanus* with occasional holly *Ilex aquifolium* and hawthorn *Crataegus monogyna* understorey, abundant dense ivy *Hedera helix* ground cover with occasional lords-and-ladies *Arum maculatum*. Significant fly-tipping has occurred from London Road.
- 3.15 To the eastern end of W1, the woodland becomes dominated by semi-mature sycamore and crack willow *Salix fragilis*, with no scrub or ground flora layer.
- 3.16 W2 to the southeast of the site is dominated by semi-mature pedunculate oak with several sycamore saplings and no apparent ground flora. Golf practice equipment is present within the woodland.
- 3.17 A semi-mature ash with significant crown die-back is present close to the northwest boundary (B1). A mature two-stemmed Lombardy poplar *Populus nigra 'Italica'* is also present to the eastern boundary (B3).

Hedgerows and boundaries

- 3.18 For ease of description the five boundaries have been labelled as: 'B1'-'B5'.
- 3.19 The northwest boundary (B1) includes a wire fence, with retaining wall and climbing/scrub vegetation including traveller's joy *Clematis vitalba*, hawthorn, holly and apple *Malus* sp. A section of gappy hedgerow to the south western end includes hawthorn and elder *Sambucus nigra* and cherry *Prunus* sp.
- 3.20 The northeast boundary (B2) is demarked by a metal post and wire fence to the woodland edge. The eastern boundary (B3) is demarked by an ornamental Leyland cypress *Cupressus x leylandii* hedge. The southeast boundary (B4) is informally demarked by the edge of woodland W2.
- 3.21 The southwest boundary (B5) is demarked by a dilapidated post and wire fence to the north end, a gappy hawthorn hedgerow to the centre, and a more defined hawthorn hedgerow to the southern end.

Dense and scattered scrub

- 3.22 Significant areas of scrub have encroached onto the grassland from the boundaries of the site and include predominantly hawthorn, as well as dense bramble and occasional elder, apple, holly and cherry.

Tall ruderal

- 3.23 Significant areas of tall ruderal have encroached grassland, likely due to the improvement through inappropriate management. Ruderal vegetation is dominated by nettle beds, but also includes stands of great willowherb *Epilobium hirsutum*, with hogweed *Heracleum sphondylium*, ground ivy and wild carrot *Daucus carota*.

Fauna

Bats

- 3.24 HBRC has provided 15 records of 5 bat species within 1km of the site. Species recorded include pipistrelle *Pipistrellus* sp., common pipistrelle *P. pipistrellus*, Daubenton's bat *Myotis daubentonii*, noctule *Nyctalus noctula* and brown long-eared *Plecotus auritus*.
- 3.25 None of the bat records provided cover the Site. The closest record lies approximately within 100m of the Site, north along a disused railway and west associated with former watercress beds and the River Ver. None of the records relate to specific bat roosts, although bats are likely to roost in older buildings or mature trees in the local area.
- 3.26 No buildings are present at the Site which provide roosting opportunities for bats. The adjacent industrial buildings to the northwest are unlikely to support roosting bats.
- 3.27 A number of mature trees are present within 'W1' adjacent to London Road. Although a formal assessment was not undertaken at this stage, several of these trees are likely to contain features that could be used for roosting by bats, such as cavities, splits and other areas of deadwood or decay.
- 3.28 Wooded areas, grassland and dense scrub on Site would likely support a range of invertebrate fauna and would therefore provide foraging opportunities for bats. The site boundaries and wooded edges could potentially be used by bats for orientation whilst commuting and foraging.
- 3.29 Several features including the active railway to the northeast, the disused railway to the north and the River Ver corridor to the southeast are likely to provide dispersal routes for bats in the wider landscape. Good foraging opportunities are also present nearby along the River Ver and former watercress beds to the southwest.

Dormouse

- 3.30 HBRC have not provided any records for dormice *Muscardinus avellanarius* within 1km of the Site. Whilst the woodland and dense scrub habitats at the Site could potentially provide opportunities for this species in the right location, the limited size of the woodland and the lack of local dormice populations significantly reduces the chance of dormice being present at the Site.

Badgers

- 3.31 No records of badger *Meles meles* have been provided by HBRC for the data search area. The habitats present within the Site offer potential foraging opportunities for badgers however no confirmed signs of badger activity were

observed within the Site. The excavations noted within dense scrub to the north of the Site is likely to be as a result of rabbits and fox activity.

Water vole

- 3.32 HBRC have provided nine records of water voles *Arvicola amphibius* from the River Ver and associated habitats over 100m west of the Site, beyond the golf course. However, at this distance and with the short-cropped golf course fairway in-between, water voles are not likely to use the terrestrial habitats at the Site.

Other Mammals

- 3.33 HBRC have also provided five records for other mammals including hedgehog *Erinaceus europaeus* and brown hare *Lepus europaeus*. The Site does provide opportunities for hedgehogs, although the lack of open land and high human disturbance from the golf course is likely to dissuade brown hare from using the Site. The Site is likely to provide opportunities for a range of small mammals.

Birds

- 3.34 HBRC have provided 41 records for 25 bird species within 1km of the Site, including six species protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended): common kingfisher *Alcedo atthis*, Eurasian hobby *Falco subbuteo*, red kite *Milvus milvus*, green sandpiper *Tringa ochropus*, redwing *Turdus idiacus* and barn owl *Tyto alba*.
- 3.35 Of these six species, the Site is likely to only provide opportunities for foraging barn owls. However, the combination of scrub, tall ruderal, woodland and grassland habitats on Site are likely to provide nesting, refuge and foraging opportunities for a range of other bird species, including long-tailed tit *Aegithalos caudatus*, song thrush *Turdus philomelos* and house sparrow *Passer domesticus* noted during the survey.

Reptiles

- 3.36 HBRC have provided five records for two reptile species, slow-worm *Anguis fragilis* and grass snake *Natrix natrix*, within 1km of the site. Anecdotal records are known for both of these species from the Watercress Wildlife Site LNR c.100m west of the Site.
- 3.37 Slow worm records provided by HBRC are associated with local allotments and the disused railway near to the Site. Given the proximity of these areas, and the suitable combination of scrub, ruderal and grassland habitats at the Site, a population of slow worms could potentially be present.
- 3.38 Grass snakes are a wide ranging species, and those that are present to the River Ver corridor are likely to use nearby terrestrial habitat, such as scrub, ruderal and grassland habitats present on Site.

Amphibians

- 3.39 HBRC have provided 14 records for three amphibian species, common toad *Bufo bufo*, common frog *Rana temporaria* and great crested newt *Triturus cristatus* within 1km of the site. Anecdotal records are known for smooth newt *Lissotriton vulgaris* from the Watercress Wildlife Site LNR c.100m northwest of the Site.
- 3.40 The Site provides good terrestrial habitat for amphibians, were suitable breeding opportunities present in the local area. However, no waterbodies are present at the Site that could potentially provide breeding opportunities for great crested newt. With reference to OS maps and aerial photography, three ponds are located have been identified within 500m of the site. However, two of these ponds (former watercress beds) are known to contain large populations of fish, and the third is located beyond the River Ver. As such, it is considered unlikely that great crested newts use the Site for hibernation, refuge or dispersal.

Invertebrates

- 3.41 HBRC have provided 102 records for 42 notable invertebrate species within the search area, including stag beetle *Lucanus cervus*, butterflies (small heath *Coenonympha pamphilus* and white-letter hairstreak *Satyrrium w-album*) and moths (39 species).
- 3.42 The combination of scrub, tall ruderal, woodland and grassland habitats on Site are likely to support a range of common invertebrate species. Of the notable species recorded nearby there is small amount of deadwood habitat available for stag beetle larvae, with other opportunities available for some of butterfly and moth species.

Evaluation of Ecological Features

- 3.43 With reference to the evaluation criteria set out in the methodology, a range of factors have to be considered when evaluating the ecological features of a site. Table 1 provides a consideration of the features of the Site against potentially relevant factors as set out in the IEEM evaluation guidelines.

Table 1. Evaluation Checklist

Factors	Status	Notes
Designated sites and features <ul style="list-style-type: none">• Internationally important sites	Absent	No internationally important sites within 5km
<ul style="list-style-type: none">• Nationally important sites	Present within vicinity	A single SSSI present within 5km. Designated for geological interest only.
<ul style="list-style-type: none">• Sites of lower level importance	Present within vicinity	No locally important sites cover the development Site. Three LNRs within 5km with the closest 100m west. Nine (local) Wildlife Sites present within 1km of the

		Site.
Hedgerows Regulations	Not assessed	The hedgerows have not been formally assessed, although none of the hedgerows are species-rich and therefore unlikely to be Important under ecological criteria.
Biodiversity value	Absent	-
• Habitat designations	Absent	-
• Non designated habitats of value or potential value	Absent	-
• BAP habitats	Present	Woodlands W1 and W2 covered under Woodland BAP. Hedgerows are covered by the Hedgerows BAP.
• Ancient Woodland	Absent	Woodland not likely to be of ancient semi-natural origin.
• Protected species	Potentially present	The potential for bats, reptiles and nesting birds has been identified.
• Rare species	None identified	None confirmed to be present.
• Species records	Present within proximity	Protected/notable species records have been provided from within 1km of the site.
• BAP species	Present	Potential exists for UK BAP list species e.g. bats and reptiles and a number of notable bird species.
Large populations/important assemblages of species	Likely absent	-
Potential value	Absent	-
Secondary or supporting value	Likely absent	-
Legal issues	Present	Protected species issues are discussed herein.

3.44 Woodland 'W2', dense scrub, tall ruderal and grassland habitats present at the Site are not considered to be of particular botanical interest therefore are considered to fall short of the criteria for features of significant ecological value. Grassland habitats previously recorded in 1985 appear to have degraded and no longer appear to support calcareous/neutral grassland species. However, habitats present at the Site are likely opportunities for a range of local wildlife, potentially including protected species.

3.45 Woodland 'W1' includes a number of mature trees although it does not appear to be of ancient semi-natural origin. As such this woodland area, along with other mature trees at the Site are considered to be of ecological value at the **Local** level.

4.0 DISCUSSIONS AND RECOMMENDATIONS

Potential Impacts and Further Survey Recommendations

Designated sites

- 4.1 No statutorily designated wildlife sites are located within or adjacent to the Site. However, the Watercress Wildlife Site LNR (also a non-statutory wildlife site) is located c.100m west of the Site beyond a disused railway line. At this distance there is likely to be some minimal recreational disturbance as a result of the development of the Site. However, this Site is actively managed by a local voluntary group for both wildlife and public enjoyment, which includes setting aside areas that are not publically assessable. As such, disturbance is likely to be actively controlled and managed at this site. No impacts to any other statutorily designated wildlife sites are predicted.
- 4.2 Eight further non-statutory wildlife sites are present between c.0.1km and 1.5km of the Site. Given the small scale of development at the Site any recreational pressure on these Sites are likely to be limited.

Habitats

- 4.3 The grassland at the Site appears to have declined significantly since 1985, where old grassland of some value was indentified. Lack of management has resulted in significant encroachment of dense scrub and tall ruderal and loss of a more diverse sward. Two indicator species have been identified at a single location which appears to be the last remnants of old grassland interest.
- 4.4 An area of woodland 'W1' with some mature trees to the north of the Site is considered to be of local ecological value. This woodland also provides screening for the Site as well as supporting the steep embankment. It is understood that vehicular access to the Site is likely to be required through this woodland. As such it is recommended that any access design should limit the amount of this woodland that is removed and avoid impacts to as many mature trees as possible.
- 4.5 Where trees are to be removed at the Site, compensatory planting with native tree species of local provenance should be undertaken alongside the development of the Site. This could be particularly appropriate along the south-eastern boundary (B4) where a linear stretch of tree and hedgerow planting could be undertaken, which would provide additional screening value.
- 4.6 An additional area of woodland to the east of the Site (W2) is some ecological value and would also provide screening for the proposed development. As such it is recommended that this woodland be retained where possible.

- 4.7 Opportunities are available to increase the ecological value of retained woodland areas at the Site through selective thinning and coppicing of trees to 'open-up' the woodland and encourage a more diverse shrub layer/ground flora. Felled material should be retained within these woodland areas to provide deadwood habitats for a range of saproxylic organisms. Fly-tipped material should be removed and the inclusion of a more substantial boundary fence would help to avoid further fly-tipping from London Road.
- 4.8 'Woodland edge' habitats could be created to protect the ongoing ecological interest of the woodlands as well as to create a biodiverse habitat which would encourage a range of wildlife. This could involve native tree, shrub herbaceous planting and/or the seeding of species-rich native grassland.
- 4.9 Further native tree, shrub and herbaceous species should be included in the ultimate landscape proposals for the Site, wherever possible.

Bats

- 4.10 The Site is likely to provide a foraging resource for local bat populations, with boundary habitats and woodland edges providing flight lines for dispersing bats. In addition, the more mature trees within the site may provide potential roosting opportunities for bats in cavities or splits. Given the proximity of the River Ver and other potential dispersal routes, it is recommended that further bat survey work be undertaken to assess the potential impact of this development on local bat populations. Several bat activity surveys should be conducted by surveyors across the spring-autumn period using broadband bat detectors and static recording units to help identify any key flight lines, important foraging areas or potential roosts within the Site or at the Site boundaries. It is recommended that a formal assessment of mature trees at the Site be undertaken for their potential to support roosting bats.
- 4.11 The findings of the bat activity surveys should be used to assess the relative value of different areas of the site for bats in order to identify those features that are a priority for retention alongside development. Consideration should also be given to the lighting design for the site in order to avoid unnecessary artificial light spill onto retained hedgerows/ tree lines, e.g. through the use of directional low UV light sources.
- 4.12 It should be noted that all species of bats are European Protected Species (EPS) and their roosts are protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010. If further survey work identifies bat roosts within or adjacent to the site that would be impacted by development, an appropriate bat mitigation strategy would be required to avoid illegal impacts to bats and their roosts.

Badgers

- 4.13 The grassland, tall ruderal and scrub at the Site provides a potential foraging resource for this species, although no conclusive signs of badgers or their setts badger were recorded during the survey. It should be noted that whilst significant excavations were identified to the north of the Site, although these were attributed to foxes and rabbits. It is recommended that these excavations and the Site as a whole be monitored for signs of badgers alongside other recommended further survey work. Badgers and their setts are afforded protection under the Protection of Badgers Act 1992.

Birds

- 4.14 The hedgerows, scrub and trees at the site offer nesting locations for a range of bird species, which could potentially include BAP and other notable species. All wild birds are protected from killing and injury, and their nests and eggs are protected from damage and destruction, under the Wildlife and Countryside Act 1981. It is therefore recommended that any dense vegetation clearance or significant tree surgery works required to facilitate development should avoid the period between March and August (inclusive) when nesting birds are most likely to be present.

Reptiles

- 4.15 Slow worms and grass snakes have been recorded within 1km of the Site. The combination of dense scrub, tall ruderal and grassland present at the Site have potential to support reptile species. Therefore it is recommended that a reptile presence/absence survey be undertaken across all suitable areas of habitat. This survey would need to be undertaken during periods of suitable weather between April and September. The survey involves the laying out of artificial refugia for reptiles, which are then checked on several occasions in combination with visual searches of the site.
- 4.16 It should be noted that all British reptile species are listed within Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are afforded protection against killing and injury under parts of sub-section 9(1) of the Act. In addition, all British reptile species are priority species within the UK BAP. Should reptiles be found to be present at the site a reptile mitigation strategy would be required to detail the measures to be implemented to retain reptiles alongside development and/or relocate them to alternative suitable habitat.

Great Crested Newts

- 4.17 No suitable aquatic habitat for great crested newt occurs within the development site or within 500m. Several ponds were identified nearby, although these are known to either support large numbers of fish or are beyond the River Ver (a likely barrier to dispersal). As such it is considered that this species is not likely to be a constraint to development of the Site.

Invertebrates

- 4.18 A range of common invertebrate species are likely to use this site. It is recommended that development proposals include measures to create opportunities for invertebrates. By way of example, new planting should be targeted towards attracting invertebrates such as moths and butterflies and felled deadwood should be left on-site as log piles within woodland, to provide opportunities for saproxylic invertebrates.

Ecological Enhancement

- 4.19 In addition to the recommendations made for specific habitats/species above, it is recommended that opportunities be explored to provide ecological enhancements in line with the recommendations within the NPPF. By way of example this may include;

- Retained habitats, such as woodland and any new wildlife planting should be managed for their wildlife interest. New planting should be undertaken as appropriate to encourage a diverse range of species and age of shrubs and trees.
- Woodland edge habitats could be created with native species of local provenance to protect the ongoing ecological interest and biodiversity of the retained woodland on Site. This may involve native tree and shrub planting and/or species-rich native grassland.
- Native plants and plants with known wildlife benefits should be incorporated into any planting within the site, such as planting within gardens and communal areas. A list of suitable species is given in the Natural England leaflet 'Plants for wildlife-friendly gardens'⁵.
- Nesting and roosting features for birds and bats could be incorporated within the fabric of new buildings or attached externally to buildings or trees. A wide variety of suitable products exist, which could be targeted at specific declining species, e.g. house martin nests and sparrow terraces
- A Habitat Management Plan should be provided to ensure the appropriate future management of habitats and wildlife features which are retained or created at this site.

- 4.24 These suggestions should not be seen as an exhaustive list as further compensation, mitigation and enhancement measures may need to be proposed once detailed protected species surveys are complete.

⁵ Plants for wildlife-friendly gardens available online at <http://naturalengland.communisis.com/naturalenglandshop/docs/NE29.pdf>

5.0 SUMMARY AND CONCLUSIONS

- 5.1 No designated wildlife sites occur within or adjacent to the proposed development Site. Three LNRs occur within 5km of the Site with Watercress Wildlife Site LNR (also a non-statutory designated site) located c.100m west of the Site. Nine non-statutory wildlife sites occur within 1.5km of the Site. No impacts are considered likely to these wildlife sites.
- 5.2 An area of woodland 'W1' is located to the north of the Site and contains some mature trees. Recommendations for retaining and enhancing as much of this habitat alongside development vehicular access for the Site have been recommended. An additional area of woodland 'W2' has also been recommended for retention and enhancement for both its ecological and screening value. Compensatory native tree planting in other areas of the Site has also been recommended.
- 5.3 The majority of the Site comprises dense scrub, tall ruderal and semi-improved grassland which is not considered to be of significant botanical value, although such habitat offers some opportunities for local wildlife. Old grassland of some ecological value has previously been identified at this site (over 25 years ago) but, with an absence of positive management over intervening years, this interest appears to have declined and a species-poor sward currently in evidence.
- 5.4 Further surveys regarding protected/notable species have been recommended to fully assess the impacts from the development and inform any mitigation required:
- **Bats** – bat activity surveys to assess the level of bat interest associated with habitats on Site and to help identify any roosts that may be present on/within close proximity to the site (across spring-Autumn period). Assessment of mature trees for their potential to support roosting bats.
 - **Reptiles** – multiple survey visits to check refugia laid within suitable habitat (between April-September).
 - **Badgers** – alongside other survey work, excavations to the northeast boundary of the Site, as well as other areas of the Site should be monitored for signs of badgers and any newly dug setts.
- 5.5 If the detailed protected species surveys recommended above reveal that such species are present at the Site, appropriate mitigation strategies will need to be developed and agreed with the Local Planning Authority to ensure impacts to protected species are avoided.

- 5.6 It is recommended that removal of mature vegetation occurs between September and February to avoid impacts to nesting birds. Such clearance will also need to consider other protected species issues/constraints.
- 5.7 A range of potential ecological enhancement measures have also been recommended to provide new features for biodiversity at the Site. Further consideration of such measures should be provided as proposals for the site develop.
- 5.8 Subject to the further surveys identified and appropriate mitigation where required, it is anticipated that a sensitive development scheme can be designed which will minimise any impacts to wildlife and provide a number of biodiversity enhancements.

Appendix A

MAGIC Database Site Check Report and Plan

Site Check Report

Report generated on April 25 2012.

You clicked on the point:

Grid Ref: **TL 155 063**

Full Grid Ref: **515574 , 206343**

The following features have been found within 5,000 metres of your search point:

Counties, Metropolitan Districts and Unitary Authorities (GB)

Name	Geographic Level
HERTFORDSHIRE	COUNTY

NUTS1 - Government Office Regions (GB)

Name	Reference	Hotlink
EAST OF ENGLAND	UKH	http://www.ons.gov.uk/ons/guide-method/geography/beginner-s-guide/european/east-of-england/index.html

Local Nature Reserves (England)

Reference	Name
1009879	WATERCRESS WILDLIFE SITE
1009336	COLNEY HEATH
1009201	THE WICK WOOD

National Nature Reserves (England)

There are no features within your search area.

Ramsar Sites (England)

There are no features within your search area.

Special Protection Areas (England)

There are no features within your search area.

Special Areas of Conservation (England)

There are no features within your search area.

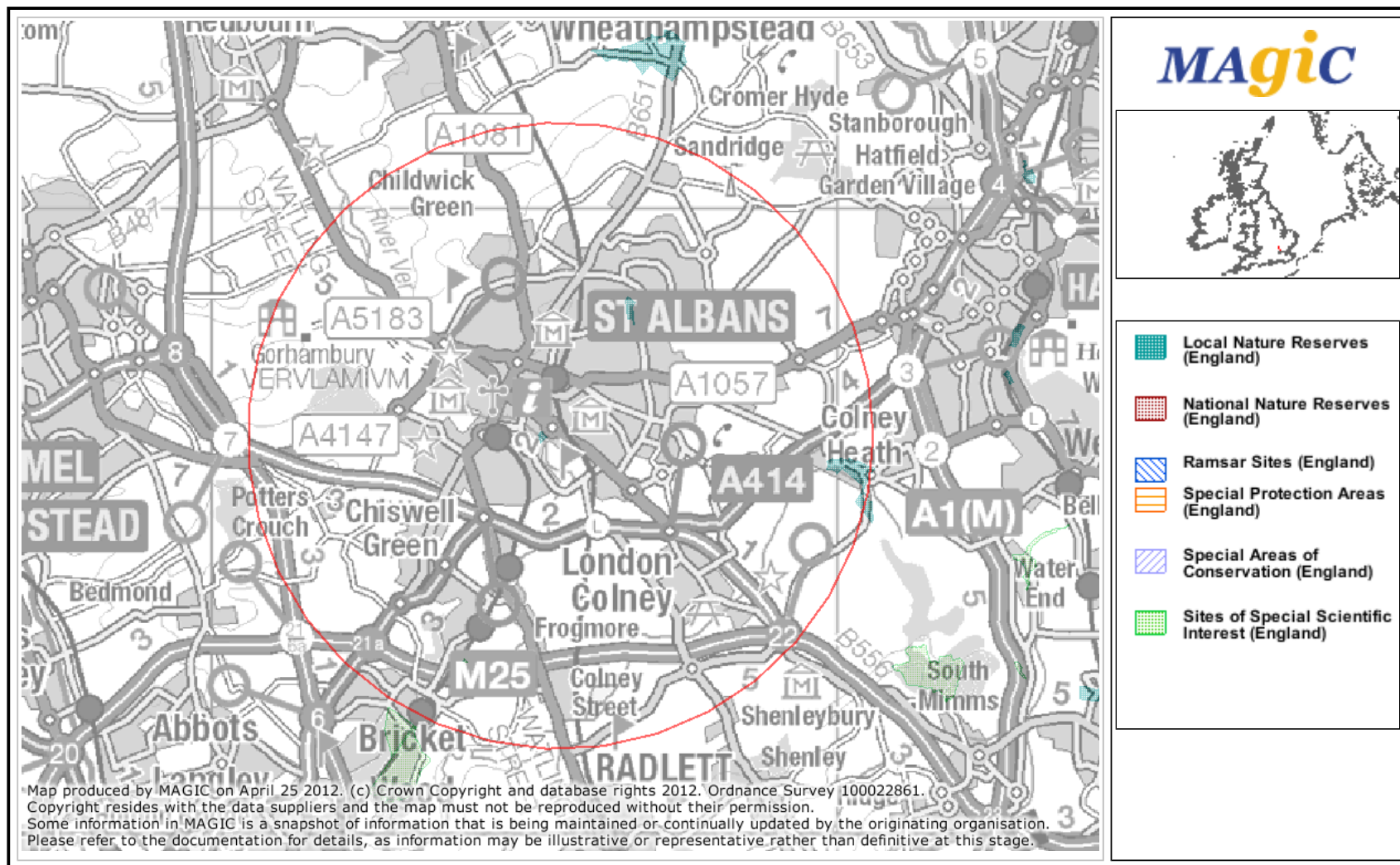
Sites of Special Scientific Interest (England)

Reference	Name	Citation
1003125	MOOR MILL QUARRY WEST	1006291

To save the report, select "Save As" from the File menu. Give the report a name of your choice and save it in "Web Page, HTML only" format.

You can then open your report using your web browser software.

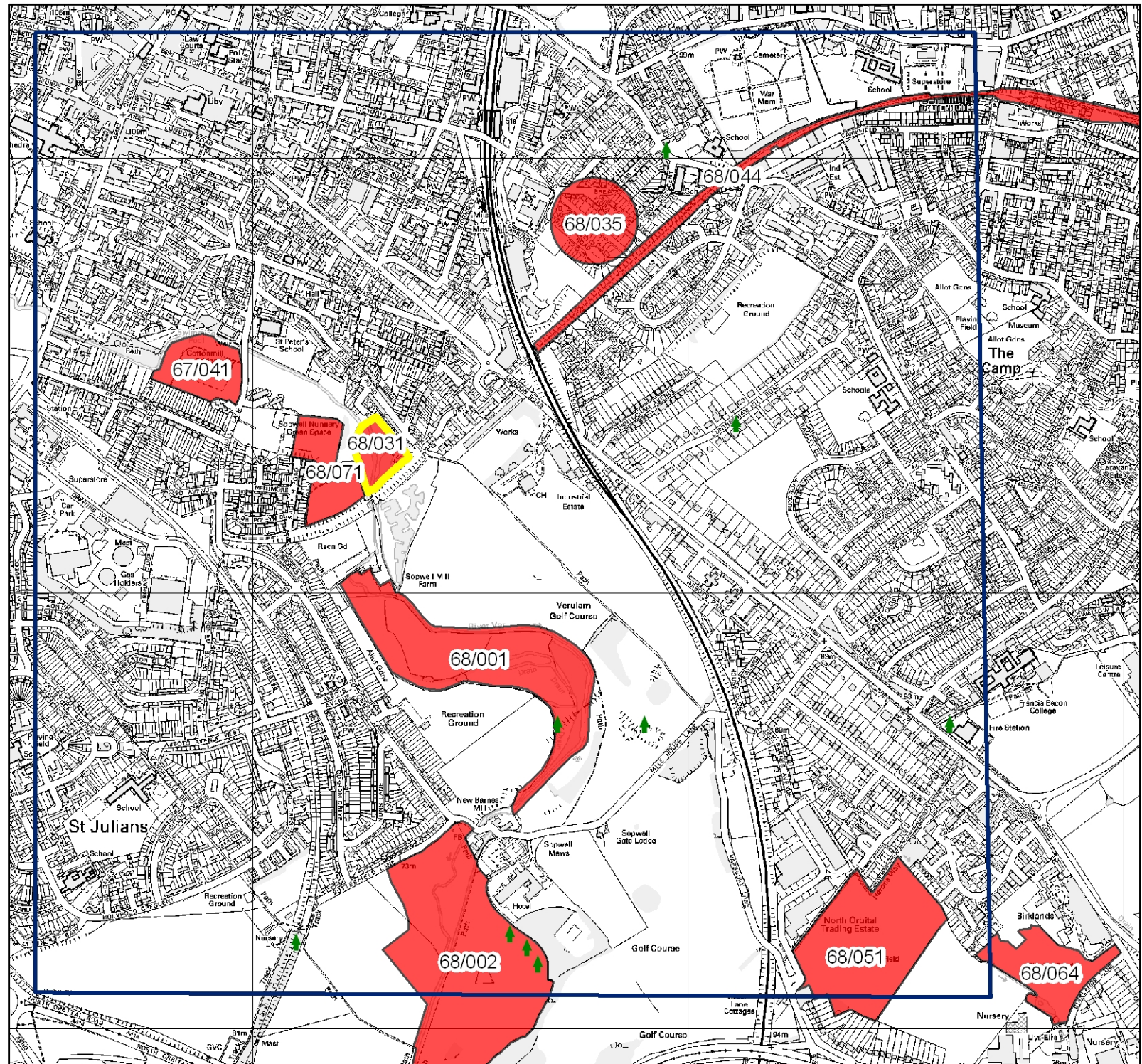
[Print Report](#) | [Close Window](#)



Appendix B

Biological Data Search Response from HBRC

HERTFORDSHIRE STATUTORY & NON-STATUTORY SITES and VETERAN / MATURE TREE RECORDS



- search_area
- ↑ Veteran & mature tree
- LNR
- Wildlife Site



Produced by
HERTFORDSHIRE
BIOLOGICAL
RECORDS
CENTRE

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Wildlife Sites Report from HBRC 18/05/2012

SITE REFERENCE	SITE NAME	GRID REFERENCE	AREA(ha)	RATIFIED	DESCRIPTION
67/041	Cottonmill Lane Allotments	TL148065	2.31	2000	Site important for protected species. Wildlife Site criteria: Species.
68/001	Sopwell Meadows	TL155058	9.61	1997	Alluvial pastures with spring sources along the valley of the River Ver supporting areas of dry semi-improved neutral grassland, species-rich unimproved wet marshy grassland, swamp and fen, and areas of open water. The site is tending towards taller, ranker vegetation due to lack of management. Scattered scrub borders the southern edge and along the old ditch lines. Typical species such as Hairy Sedge (<i>Carex hirta</i>), Tufted Hair-grass (<i>Deschampsia cespitosa</i>), Marsh Horsetail (<i>Equisetum palustre</i>), rushes (<i>Juncus</i> spp.), Yorkshire Fog (<i>Holcus lanatus</i>) and Creeping Buttercup (<i>Ranunculus repens</i>) occur in the wetter grassland. Inundation communities support a good diversity of species including Reed Sweet-grass (<i>Glyceria maxima</i>), Lesser Pond-sedge (<i>Carex acutiformis</i>) and Reed Canary-grass (<i>Phalaris arundinacea</i>) with Greater Bird's-foot Trefoil (<i>Lotus pedunculatus</i>), Meadowsweet (<i>Filipendula ulmaria</i>), Wild Angelica (<i>Angelica sylvestris</i>), Marsh Thistle (<i>Cirsium palustre</i>) and Common Sedge (<i>Carex nigra</i>). Several uncommon plants have been recorded including Purple Willow (<i>Salix purpurea</i>), Bogbean (<i>Menyanthes trifoliata</i>) and Marshy Willowherb (<i>Epilobium palustre</i>). Water Vole (<i>Arvicola amphibius</i>) has been recorded along the river and the site is generally important for a range of invertebrates and birds. Wildlife Site criteria: Grassland indicators; fen and swamp indicators.
68/002	Ver Valley Meadows	TL154052	27.96	1997	A series of old mainly unimproved meadows along the valley of the River Ver supporting predominantly neutral grassland but with more acid communities on areas of higher ground. The grassland varies from damp to very wet, with marshy grass and rarer

Wildlife Sites Report from HBRC 18/05/2012

					swamp/fen vegetation present in lower lying areas. The neutral grassland is dominated by Crested Dog's-tail (<i>Cynosurus cristatus</i>), Common Bent (<i>Agrostis capillaris</i>) and Perennial Rye-grass (<i>Lolium perenne</i>) with additional species such as Meadow Buttercup (<i>Ranunculus acris</i>) and Meadow Vetchling (<i>Lathyrus pratensis</i>). Species in the wetter, marshy areas include Hard Rush (<i>Juncus inflexus</i>), Tufted Hair-grass (<i>Deschampsia cespitosa</i>), Ragged Robin (<i>Lychnis flos-cuculi</i>), Marsh Horsetail (<i>Equisetum palustre</i>), Common Spike-rush (<i>Eleocharis palustris</i>) and Hairy Sedge (<i>Carex hirta</i>). The swamp/fen vegetation is dominated by Reed Sweet-grass (<i>Glyceria maxima</i>) and Lesser Pond-sedge (<i>Carex acutiformis</i>). The more acidic swards comprise species such as Common Bent (<i>Agrostis capillaris</i>), Lady's Bedstraw (<i>Galium verum</i>), Sheep's Sorrel (<i>Rumex acetosella</i>), Harebell (<i>Campanula rotundifolia</i>) and Bird's-foot Trefoil (<i>Lotus corniculatus</i>). Wildlife Site criteria: Grassland indicators.
68/031	Sopwell House Watercress Beds	TL15-06-	0	1997	Site important for protected species. Wildlife Site criteria: Species.
68/035	Shirley Road Allotments	TL15-06-	0	1997	Site important for protected species. Wildlife Site criteria: Species.
68/044	Smallford Trail/Alban Way	TL177067	8.82	1997	Dismantled railway route used as a public path/bridleway. The site is predominantly lined with secondary broadleaved woodland and scrub, including some very old coppiced specimens, with remnant areas of grass and tall herbs, mainly along the edges of the path in the east. Mature Pedunculate Oak (<i>Quercus robur</i>) is dominant with frequent Ash (<i>Fraxinus excelsior</i>) and Sycamore (<i>Acer pseudoplatanus</i>) plus some Field Maple (<i>Acer campestre</i>) and Silver Birch (<i>Betula pendula</i>) along with frequent shrubs including Hawthorn (<i>Crataegus monogyna</i>), Hazel (<i>Corylus avellana</i>), Blackthorn (<i>Prunus spinosa</i>), Dogwood (<i>Cornus sanguinea</i>) and

Wildlife Sites Report from HBRC 18/05/2012

					Elder (<i>Sambucus nigra</i>). The ground flora is locally dominated by Ivy (<i>Hedera helix</i>) but supports numerous woodland indicators including Bluebell (<i>Hyacinthoides non-scripta</i>), Dog's Mercury (<i>Mercurialis perennis</i>), Wood Melick (<i>Melica uniflora</i>), Wood Sedge (<i>Carex sylvatica</i>), Wood Anemone (<i>Anemone nemorosa</i>), Yellow Archangel (<i>Lamium galeobdolon</i>) and Pignut (<i>Conopodium majus</i>). The areas of rough unimproved grassland and taller herbs support a moderately diverse community including several grassland indicators such as Oxeye Daisy (<i>Leucanthemum vulgare</i>), Common Knapweed (<i>Centaurea nigra</i>) and Bird's-foot Trefoil (<i>Lotus corniculatus</i>). Wildlife Site criteria: Old secondary woodland with a semi-natural canopy and varied structure; >2 ha; woodland indicators; grassland indicators.
68/051	North Orbital Fields	TL164052	7.58	1997	Fields supporting semi-improved neutral grassland with much invading scrub. The grassland supports a rough sward with a reasonable mix of fine and taller grasses and herbs. Typical species recorded include Sweet Vernal-grass (<i>Anthoxanthum odoratum</i>), Meadow Foxtail (<i>Alopecurus pratensis</i>), Common Sorrel (<i>Rumex acetosa</i>), Oxeye Daisy (<i>Leucanthemum vulgare</i>), Meadow Buttercup (<i>Ranunculus acris</i>) and Bulbous Buttercup (<i>R. bulbosus</i>). The scrub is mainly of Pedunculate Oak (<i>Quercus robur</i>) and Hawthorn (<i>Crataegus monogyna</i>) and the fields are partly bordered by hedgerows. Wildlife Site criteria: Grassland indicators.
68/064	Birklands Fields	TL168051	3.2	1997	Semi-improved neutral grassland supporting a good diversity of indicator species. The grassland is typically Red Fescue (<i>Festuca rubra</i>), Meadow Foxtail (<i>Alopecurus pratensis</i>), Sweet Vernal-grass (<i>Anthoxanthum odoratum</i>) and Yorkshire Fog (<i>Holcus lanatus</i>) with Lady's Bedstraw (<i>Galium verum</i>), Common Knapweed (<i>Centaurea nigra</i>), Pignut (<i>Conopodium majus</i>), Yarrow (<i>Achillea millefolium</i>), Field Wood-rush (<i>Luzula campestris</i>), Burnet-saxifrage (<i>Pimpinella saxifraga</i>), Meadow

Wildlife Sites Report from HBRC 18/05/2012

					Buttercup (<i>Ranunculus acris</i>) and Bulbous Buttercup (<i>Ranunculus bulbosus</i>) prominent in the sward. Only the edges show a decrease in diversity. The pond in the southern corner along with a small stream and scrubby Ash (<i>Fraxinus excelsior</i>) and Pedunculate Oak (<i>Quercus robur</i>) woodland provide valuable additional habitat. Wildlife Site criteria: Grassland indicators.
68/071	Sadleir Road Allotments	TL152063	2.38	2000	Site important for protected species. Wildlife Site criteria: Species.

Species records

Common Name	Scientific Name	Group
Common Toad	Bufo bufo	amphibian
Common Frog	Rana temporaria	amphibian
Great Crested Newt	Triturus cristatus	amphibian
Eurasian Sparrowhawk	Accipiter nisus	bird
Common Kingfisher	Alcedo atthis	bird
Common Swift	Apus apus	bird
Little Owl	Athene noctua	bird
Common Buzzard	Buteo buteo	bird
Eurasian Siskin	Carduelis spinus	bird
Stock Pigeon	Columba oenas	bird
Mute Swan	Cygnus olor	bird
Great Spotted Woodpecker	Dendrocopos major	bird
Lesser Spotted Woodpecker	Dendrocopos minor	bird
Eurasian Hobby	Falco subbuteo	bird
Common Kestrel	Falco tinnunculus	bird
Red Kite	Milvus milvus	bird
Grey Wagtail	Motacilla cinerea	bird
Northern Wheatear	Oenanthe oenanthe	bird
Grey Partridge	Perdix perdix	bird
Willow Warbler	Phylloscopus trochilus	bird
Green Woodpecker	Picus viridis	bird
Common Bullfinch	Pyrrhula pyrrhula	bird
Eurasian Woodcock	Scolopax rusticola	bird
European Turtle Dove	Streptopelia turtur	bird
Green Sandpiper	Tringa ochropus	bird
Redwing	Turdus iliacus	bird
Redwing	Turdus iliacus	bird
Song Thrush	Turdus philomelos	bird
Barn Owl	Tyto alba	bird
Good-King-Henry	Chenopodium bonus-henricus	flowering plant
Marsh Willowherb	Epilobium palustre	flowering plant
Bluebell	Hyacinthoides non-scripta	flowering plant
Lime	Tilia platyphyllos x cordata = T. x europaea	flowering plant
Stag Beetle	Lucanus cervus	insect - beetle (Coleoptera)
Small Heath	Coenonympha pamphilus	insect - butterfly
White-letter Hairstreak	Satyrion w-album	insect - butterfly
Grey Dagger	Acronicta psi	insect - moth
Knot Grass	Acronicta rumicis	insect - moth
Flounced Chestnut	Agrochola helvola	insect - moth
Brown-spot Pinion	Agrochola litura	insect - moth
Beaded Chestnut	Agrochola lychnidis	insect - moth
Mouse Moth	Amphipyra tragopoginis	insect - moth
White-spotted Sable	Anania funebris	insect - moth
Dusky Brocade	Apamea remissa	insect - moth
Garden Tiger	Arctia caja	insect - moth
Centre-barred Sallow	Atethmia centrago	insect - moth
Mottled Rustic	Caradrina morpheus	insect - moth
Latticed Heath	Chiasmia clathrata	insect - moth
Small Square-spot	Diarsia rubi	insect - moth
Figure of Eight	Diloba caeruleocephala	insect - moth
Dusky Thorn	Ennomos fuscantaria	insect - moth
Garden Dart	Euxoa nigricans	insect - moth
Double Dart	Graphiphora augur	insect - moth

Small Emerald	<i>Hemistola chrysoprasaria</i>	insect - moth
Ghost Moth	<i>Hepialus humuli</i>	insect - moth
Large Clouded Knot-horn	<i>Homoeosoma nebulella</i>	insect - moth
Rosy Rustic	<i>Hydraecia micacea</i>	insect - moth
Brindled Beauty	<i>Lycia hirtaria</i>	insect - moth
V-moth	<i>Macaria wauaria</i>	insect - moth
Lackey	<i>Malacosoma neustria</i>	insect - moth
Dot Moth	<i>Melanchra persicariae</i>	insect - moth
Rosy Minor	<i>Mesoligia literosa</i>	insect - moth
Dark Spinach	<i>Pelurga comitata</i>	insect - moth
Shaded Broad-bar	<i>Scotopteryx chenopodiata</i>	insect - moth
White Ermine	<i>Spilosoma lubricipeda</i>	insect - moth
Buff Ermine	<i>Spilosoma luteum</i>	insect - moth
Hedge Rustic	<i>Tholera cespitis</i>	insect - moth
Blood-Vein	<i>Timandra comae</i>	insect - moth
Pale Eggar	<i>Trichiura crataegi</i>	insect - moth
Cinnabar	<i>Tyria jacobaeae</i>	insect - moth
Oak Hook-tip	<i>Watsonalla binaria</i>	insect - moth
Dusky-lemon Sallow	<i>Xanthia gilvago</i>	insect - moth
Sallow	<i>Xanthia icteritia</i>	insect - moth
Dark-barred Twin-spot Carpet	<i>Xanthorhoe ferrugata</i>	insect - moth
Sword-grass	<i>Xylena exsoleta</i>	insect - moth
Large White-moss	<i>Leucobryum glaucum</i>	moss
Fringed Bog-moss	<i>Sphagnum fimbriatum</i>	moss
Blunt-leaved Bog-moss	<i>Sphagnum palustre</i>	moss
Lesser Screw-moss	<i>Syntrichia virescens</i>	moss
Slow-worm	<i>Anguis fragilis</i>	reptile
Grass Snake	<i>Natrix natrix</i>	reptile
European Water Vole	<i>Arvicola terrestris</i>	terrestrial mammal
a Bat	Chiroptera	terrestrial mammal
West European Hedgehog	<i>Erinaceus europaeus</i>	terrestrial mammal
Brown Hare	<i>Lepus europaeus</i>	terrestrial mammal
Daubenton's Bat	<i>Myotis daubentonii</i>	terrestrial mammal
Noctule Bat	<i>Nyctalus noctula</i>	terrestrial mammal
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>	terrestrial mammal
Brown Long-eared Bat	<i>Plecotus auritus</i>	terrestrial mammal

Appendix C

Habitats Plan
CSa/1960/100



- Survey area
- Wn Broadleaved woodland (with woodland reference)
- Dense scrub
- Tall ruderal
- Broadleaved tree
- x Scattered scrub
- SI (Gn) Species-poor semi-improved grassland (with grassland reference)
- Tn Target note
- Bn Boundary reference
- Fence
- Hedgerow
- Gappy hedgerow
- Coniferous hedge

- Target Notes**
1. Extensive excavations (rabbit warren with fox activity)
 2. Leyland cypress hedge
 3. Golf practice equipment



Date: June 2012

Land adjacent to Verulam
Golf Club, St Albans,
Hertfordshire

Landscape and Visual Assessment

Prepared by
CSa Environmental Planning

On behalf of
Beechwood Homes Limited

Report No: CSa/1960/02a

Date: June 2012

Land adjacent to
Verulam Golf Club, St
Albans, Hertfordshire

Landscape and Visual Assessment

Prepared by
CSa Environmental Planning

On behalf of
Beechwood Homes Limited



6523

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Appendices

Appendix A: Site Location Plan

Appendix B: Aerial Photograph

Appendix C: Photosheets

Appendix D: Magic Map

Appendix E: Planning Policy

Appendix F: Listed Buildings

1.0 INTRODUCTION

Background

- 1.1 CSa Environmental Planning has been appointed by Beechwood Homes Ltd to undertake a landscape and visual assessment of the land adjacent to Verulam Golf Club, St Albans. The site is being promoted for residential development through St Alban's District Council's Local Development Framework ('LDF') process. An ecological appraisal and overview assessment of the existing trees have also been undertaken by CSa, in order to inform the LDF process and assess the suitability of the site for development.
- 1.2 This assessment describes the existing landscape character and quality of the site and its visual characteristics. The report then goes on to discuss the development proposals and any potential landscape impacts on the wider area.

Methodology

- 1.3 This assessment is based on site visits undertaken by a suitably qualified and experienced Landscape Architect in May 2012.
- 1.4 In landscape and visual impact assessments, a distinction is drawn between landscape effects (i.e. effects on the character or quality of the landscape irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people's views of the landscape, principally from any residential properties, but also from public rights of way and other areas with general public access). This report therefore considers the potential impact of the development on both landscape character and visibility.
- 1.5 Photographs contained within this document (**Appendix C**) were taken using a digital camera with a lens focal length approximating to 50mm, to give a similar depth of vision to the human eye. In some instances images have been combined to create a panorama.

2.0 SITE LOCATION AND POLICY CONTEXT

Site Context

- 2.1 The site is located approximately 1km southwest of St. Albans town centre. Immediately to the south of the site is the clubhouse and car parking associated with the Verulam golf course. The open landscape of the golf course extends alongside the eastern flank of the River Ver valley, forming part of a wider green corridor indented into the southern edge of the town and following the course of the river north west through the St Albans urban area. The industrial units at Verulam Industrial Estate lie to the south east, whilst to the north west of the site are the former watercress beds which are now a local nature reserve.
- 2.2 Immediately to the north of the site lies an old railway works building, which is currently being used for light industrial uses. Beyond this, is more recent residential development at Orient Close, which includes the older, listed building at the Old Station House which is currently in use as a children's nursery. The site is bordered to the north east by London Road, which is crossed by the Midland Main railway line a short distance to the east of the site boundary.

National Landscape Character

- 2.3 'The Character of England: Landscape, Wildlife and Natural Features: 1999' (a national assessment of landscape character by the Countryside Commission (now the Countryside Agency) and English Nature (now Natural England)) identifies the site as lying within the 'North Thames Basin' (Character Area 111). The character area has been divided into several regions, the relevant one to this project being the 'Hertfordshire Plateaux and River Valleys.'
- 2.4 The Character Map describes the area as a diverse landscape with a series of broad valleys containing the major rivers Ver, Colne and Lea and extensive areas of broadleaved woodlands. The landform is varied with a wide plateau divided by valleys. It goes on to state that Hertfordshire's large towns, the M25 and M1 motorways, railway lines and prominent electricity pylons are also a major influence on character. Many river valleys have been extensively modified by reservoirs, current and reclaimed gravel pits, landfill sites, artificial wetlands, river realignments and canals.
- 2.5 The area comprises much transitional countryside as rural Hertfordshire merges into the northern London suburbs. The document states that the character of the landscape is often despoiled by urban activity, particularly the motorways and associated services and power lines.

County Character Assessment

- 2.6 Hertfordshire County Council have also published a Landscape Character Assessment for Hertfordshire, compiled between 2000 and 2005. The site is located within area 17 the Ver and Colne River Valley. The area is described as a narrow river valley corridor which skirts a mosaic of settlements, parkland, farmland and both active and restored mineral workings. The floodplain is characterised by a mix of pasture (with grazing cattle), arable conversion and recreational areas, while land uses on the valley slopes are identified as being a mix of arable cropping, golf courses, restored land and parkland.

Landscape Policy Context

- 2.7 St Albans District Council is currently in the process of developing its Local Development Framework. The council published an Emerging Core Strategy in 2009, which gives an indication of the policies which will guide future development in the borough, however these have not at this stage been finalised. The core strategy states that 'the council must plan for a minimum of 10,800 additional homes between 2001 and 2031' and that 'Providing for this level of housing will inevitably lead to use of Green Belt land.' Until a Core Strategy is formally adopted the saved policies contained in the Local Plan (1994) remain relevant.
- 2.8 The Government published the National Planning Policy Framework ('NPPF') in March 2012. As a result, all Council's will need to update their development plan documents to accord with the policies contained within the NPPF. Any existing development plan policies adopted since 2004 will be given full weight for a period of 12 months. In other cases, due weight will be given to existing policies according to their degree of consistency with this framework.
- 2.9 Saved Policy 1 relates to the Metropolitan Green Belt. The policy states that 'within the Green Belt, except for development in Green Belt settlements referred to in Policy 2 or in very special circumstances, permission will not be given for development.' Section 9 of the National Planning Policy Framework (2012) sets out the Government's position on Green Belt land. Paragraph 80 of this document identifies the five purposes of the Green Belt:
- To check unrestricted sprawl of large built up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns;
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.10 Saved Policy 2 of the Local Plan deals with settlement strategy. This policy seeks to protect and enhance the essential character of existing settlements. The policy goes on to state that ‘the nature and intensity of development acceptable in particular locations will reflect the settlement hierarchy.’ St Albans is classified as a town. The policy states that ‘development will generally be concentrated in towns, but proposals should not detract from their essential character.’
- 2.11 Landscaping and tree preservation is dealt with by saved Policy 74. It states that the council will take account of the following landscaping factors when considering planning applications:
- (i) Retention of existing landscaping
 - a) significant healthy trees and other important landscape features, such as hedgerows ponds and watercourses shall normally be retained unless it can be shown that retention is incompatible with overall design quality and/or economic use of the site;
 - b) on sites with significant existing landscaping, planning applications shall be supported by a full tree survey indicating all landscape features, tree species, canopy spread, trunk diameter and levels at the base of each tree;
 - c) trees shall not normally be severely topped or lopped, or endangered by construction work or underground services. In addition, buildings shall not be sited where they are likely to justify future requests for tree felling or surgery for reasons of safety, excessive shading, nuisance or structural damage; and
 - d) the Council will make tree preservation orders and/or attach appropriate landscaping conditions to planning permissions to safeguard existing trees and ensure that new planting is established and protected.
- 2.12 Saved Policy 103 relates to forestry and woodland. It states that ‘proposals for development which would result in the loss of significant woodland or trees will normally be resisted.’
- 2.13 St Albans District Council have designated a number of landscape conservation areas which cover areas of ‘county or regional landscape importance.’ The proposed site does not fall within one of these areas, however saved Policy 104 states that ‘the council will seek to preserve and enhance the quality of landscape throughout the District.’
- 2.14 Several ‘Landscape Development Areas’ have also been identified by the Council. The Council will seek to secure landscape creation, improvement and enhancement throughout the Green Belt countryside with priority being given to these Landscape Development Areas and the urban fringe. The southern part of the site is partially located within one of these Landscape Development Areas.

- 2.15 The site is situated within Watling Chase Community Forest. This is an area of 72 square miles (188 square kilometres) in south Hertfordshire and north London. The forest consists of a mixture of farmland, meadows, wildlife areas, hedgerows and woodland as well as public open space and the urban fringe. The 'Vision for Watling Chase', described in the Forest Plan, is to see much of the area under the positive and appropriate management by 2025. Saved Policy 143A of the Local Plan states that 'the council will support the establishment of the Watling Chase Community Forest.'

Listed Buildings

- 2.16 There are a number of listed buildings within 500m of the site as shown on the Listed Buildings Plan contained in **Appendix F**. The nearest listed building is the Old Station House which can be found approximately 75m north-west of the site, though it is visually and physically separated from the site by intervening buildings. Sopwell Mill is located approximately 400m south-west of the site, adjacent to the River Ver. The site however is well screened by mature riparian vegetation in views from the mill. The ruins of Sopwell Nunnery can be found further up-stream, around 400m west of the site. Again, the site is well screened in views and separated from the nunnery by a heavily vegetated former railway embankment, which now forms part of the Alban Way National Trail.
- 2.17 The site adjoins the south-eastern boundary of the St. Albans Conservation Area. The conservation area, first designated in 1969, covers a large part of the town which includes the historic centre, the Roman remains together with 19th and early 20th century suburbs. St Albans District Council have also identified locally listed buildings. These are buildings which are considered to contribute positively to the distinctive character of St. Albans conservation area. None of the buildings in the immediate vicinity of the site have locally listed status indicating that they are not thought by the council to contribute to the distinctive character of the conservation area.

Scheduled Monuments

- 2.18 The ruins of Sopwell Nunnery are also designated as a scheduled monument, however as mentioned previously they are separated from the proposed site by a densely vegetated former railway embankment.

Tree Preservation Orders

- 2.19 St. Albans Borough Council was consulted regarding Tree Preservation Orders and it was confirmed by email that there are no Tree Preservation Orders relating to the proposed site.

3.0 SITE DESCRIPTION AND VISIBILITY

- 3.1 The site occupies a broadly rectangular field, which extends to approximately 2ha. The interior of the site comprises predominately of grassland with areas of encroaching scrub vegetation, mainly hawthorn, and pockets of nettles. It is bounded to the south and east by a dense band of established woodland. A more detailed description of the site is set out below.

Landform

- 3.2 The landform within the site slopes southwards from the northern boundary with the former railway works for a short distance only, before rising sharply within the central and southern portion of the site towards the boundary with the Golf Club. To the north east, the boundary with London Road is marked by a steeply sloping embankment, approximately 8 – 9m in height, which rises sharply to meet the road. The site is further contained to the north east by the embanked route of the Midland Main Line which passes over the top of London Road at this point.
- 3.3 The landform continues to rise within the residential area to the north of the site, with the heavily vegetated embanked route of a dismantled railway, now part of the Alban Way national Trail, forming a strong visual break in this direction. The club house and car parking area associated with the golf club occupy an elevated position at the top of the Ver Valley, with the prevailing topography falling westwards towards the river, before rising once more towards residential development along Cottonmill Lane.

Boundary Conditions

- 3.4 The steeply banked boundary with London Road, to the north east, is defined by a mature band of woodland, comprising of oak, ash and sycamore trees up to 20m in height. A dense band of young, predominately oak woodland, some 30 metres in depth, extends along the south eastern site boundary with the golf club, forming a robust edge to the site at this point. To the south west, the boundary is defined by a dilapidated post and wire fence, with a hawthorn hedgerow extending alongside the central and southern portion of the boundary. To the north west the boundary with the former railway works building is largely open, with occasional pockets of scrub vegetation.

Landscape Quality

- 3.5 The interior of the site comprises of a relatively undistinguished mosaic of grassland and developing scrub vegetation. In terms of character, it is influenced by its proximity to the existing urban area, with the former railway works buildings, and the housing at Orient Close forming the backdrop in views to the north. The woodland band which forms the boundary to the south east and east of the site, is a notable landscape feature, providing an effective screen between the site and the adjoining landscape of the Ver River valley. Accordingly, the landscape of the site is only considered to be of Medium landscape quality, declining within the northern part of the site to low quality, adjacent to the existing urban area.

Public Rights of Way

- 3.6 There are no public footpaths which cross the site, however there are a number of public rights of way located in the area around the site. A public footpath runs adjacent to the south-western boundary of the site before continuing across the adjacent golf course. A dismantled railway line runs parallel to the north-western boundary. The railway has been designated as a Permitted Bridleway, meaning that the landowner has permitted public access. Redevelopment at Orient Close has caused the original course of the railway to be lost and the bridleway follows the course of the road at this point. To the north-east of London Road the path regains the original track bed. The dismantled railway also forms part of the Alban Way National Trail and is also part of the national cycle network (route number 61). A further national trail passes through the area. The Ver-Colne Valley Walk runs along Cottonmill Lane before turning northwards and following the course of the river more closely. It is approximately 300m from the site at its closest point.

Visibility

- 3.7 The site is extremely well contained in views from the surrounding area by a combination of landform and vegetation, both within the site and within the adjoining valley landscape. The principle views of the site are shown on the photographs contained in **Appendix C**, with the photo locations shown on the location plan and aerial photograph contained within **Appendices A** and **B** respectively. The key views are considered in more detail below.

North

- 3.8 Views towards the site from the north are restricted by the industrial buildings which extend along almost the entire length of the northern site boundary, (**Photograph 08**) and the heavily vegetated embankment along the route of Alban Way. The rear of the industrial buildings present a largely blank façade to the site, although there are a few windows within the office building adjacent to London Road which have views into the woodland at the eastern site boundary (**Photograph 05**). There are also a few properties at the south western extent of Orient Close which have partial views from the rear elevation of the south western part of the site, although these are seen in context with the industrial units in the foreground.

East

- 3.9 Views of the site from London Road to the east are heavily filtered by the vegetation along the north eastern site boundary, with the remainder of the site located several metres below the road (**Photograph 10**). Any views from further afield are prevented by the Midland Main railway line which passes over London Road a short distance to the north east of the site.

South

- 3.10 Views towards the site from the landscape to the south are largely prevented by a combination of intervening vegetation and topography, and where they exist they extend only as far as the dense boundary woodland along the south eastern site boundary. There are heavily filtered views from the car park at the adjoining golf club and from the northern edge of the adjoining industrial estate (**Photographs 06 and 07**).

West

- 3.11 There are views across the site from the public footpath which runs adjacent to the site boundary (**Photograph 02**). Views from further afield within the River Ver valley landscape are prevented by the proliferation of intervening vegetation.

4.0 LANDSCAPE CONSTRAINTS AND SUITABILITY OF THE SITE TO ACCOMODATE DEVELOPMENT

- 4.1 This section considers the ability of the site to accommodate development, in landscape terms, against a series of landscape criteria. For the purpose of this assessment it has been assumed that any development would typically be two stories in height (ridge height approximately 8.5m) with limited use of 2 ½ and 3 storey houses (ridge height up to 11m), and comparable in scale and layout to the adjoining residential area to the north.

Impact on landscape features

- 4.2 There is little vegetation of note contained within the interior of the site to constrain residential development. The significant woodland band adjacent to the south eastern boundary forms a robust edge between the site and the adjoining golf course and river valley, and would be retained and enhanced as part of any development proposals for the site.
- 4.3 Access to the site from London Road will need to address the significant change in level between the site and the road. Any access proposals will need to minimise extensive earthworks which impact significantly on the woodland alongside the north eastern boundary. Subject to the sensitive design of the site access, and appropriate landscape mitigation, the loss of some vegetation along this boundary should not pose an over-riding constraint to development at the site.
- 4.4 Any development at the site would also provide opportunities for additional landscaping within areas of open space and alongside the north western boundary with the public footpath and the adjoining industrial units to the north west.

Landscape / Townscape Effects

- 4.5 As discussed above the site occupies an area of grassland and scrub on the urban fringe of the existing built up area. Accordingly, in terms of landscape character it only of medium to low landscape quality with a low sensitivity to change. It is visually and physically separated from the adjoining landscape of the golf course and the more attractive landscape of the River Ver by a combination of the dished landform of the site and the dense boundary vegetation. Accordingly, any development at the site would have no material impact on the character of the adjoining landscape to the south and west.

- 4.6 The boundary of St Albans Conservation Area extends alongside the north western site boundary. Notwithstanding this, the architecture of the adjoining industrial sheds has little architectural merit, and the recent housing development at Orient Close is pleasant but undistinguished. In addition, the adjoining sheds form a physical barrier between the site and the surrounding residential area. Accordingly, appropriate development at the site would have no material impact on the setting or character of the adjoining residential area or the townscape of the St Albans conservation area.
- 4.7 The loss of vegetation along the north eastern site boundary with London Road will have a direct landscape effect in the short term. London Road at this point is a busy thoroughfare providing access to the town centre from the south. The character of the route is influenced by the regular passage of vehicles, the imposing brick railway bridge which crosses the road close to the site, and the industrial units to the north and south east of the site. As a result, the vegetation at the site boundary provides some relief to the utilitarian character of the adjoining streetscape. Accordingly, any access proposals will need to provide adequate provision for additional landscape planting alongside this boundary to compensate for any vegetation lost as a result of the access.

Visual Effects

- 4.8 The previous section considered the significant views of the site from the surrounding area. This identified that views of the site are limited to a few instances in the immediate vicinity. The visual effect of development at the site on these views is considered below.
- 4.9 There are approximately eight properties on the south western end of Orient Close which will have partial views of development at the site. Any views from these sensitive receptors will be seen in context with the adjoining industrial units and associated car parking occupying the immediate foreground. Additional landscaping alongside the north western site boundary will filter views in due course. Accordingly, there will be little material impact on the quality of views from these receptors.
- 4.10 There will be views of development from a short section of the public footpath which runs adjacent to the south western boundary. Again, although the character of the site will inevitably change, this section of the footpath is already influenced by its proximity to the existing residential area and the adjoining industrial uses. Accordingly, although development will extend built form a short distance further along the route, it will not significantly impact on the character or visual enjoyment of the right of way at this point. In fact, additional landscaping adjacent to the boundary will have a positive impact as it matures.

- 4.11 There will be views of development from a very short section of London Road adjacent to the north eastern site boundary. At present, these views are heavily filtered by the existing vegetation, however any access to the site off London Road will result in the loss of some mature vegetation at this point opening the site up to views. Notwithstanding this, receptors at this point will be primarily traveling in vehicles and views of the site will be fleeting. In addition, any development will be set several metres below the height of the road and will not be visually intrusive. Additional landscaping alongside the site access will filter views of the site and provide an appropriate entrance into the development. Accordingly, any effect on views is not considered to be significant, particularly once the new landscape planting has established.
- 4.12 Views towards the site from the golf course carpark and the adjoining industrial units to the south east are heavily filtered by the woodland at the site boundary, and any effects are considered to be insignificant.

Metropolitan Green Belt

- 4.13 Development at the site will necessitate its release from the Metropolitan Green Belt. Following our assessment of the site and its immediate surrounds, it is apparent that the development could be accommodated at the site without compromising the objectives of the Green Belt for the following reasons:
- The site occupies a discrete land parcel closely related to the existing urban edge and benefitting from clearly defined and defensible boundaries;
 - The development limits are clearly defined and will not result in urban sprawl or coalescence with adjoining settlements;
 - The site is visually and physically separated from the adjoining landscape to the south and west and development will not impact on its character or setting; and
 - Development will not impact on the character or setting of the adjoining residential area, or the wider St Albans Conservation Area.

Compliance with Policy

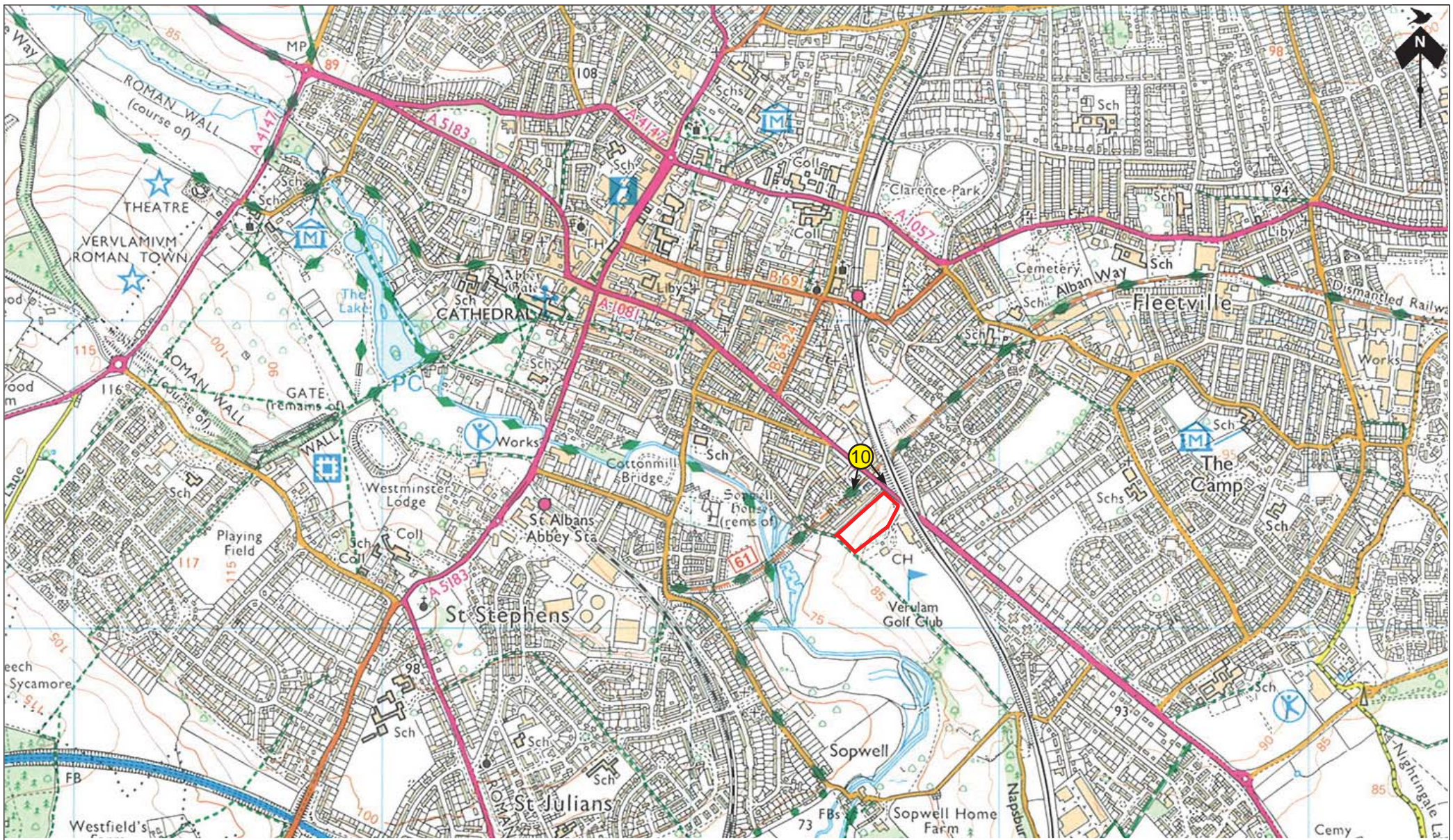
- 4.14 The southern part of the site lies within an area designated as a 'Landscape Development Area'. Much of this area comprises existing woodland which extends alongside the boundary at this point and will be retained and enhanced as part of any development at the site. The site also lies within the Watling Chase Community Forest. Again, the majority of the woodland present on site will be retained and supplement with additional native planting. Furthermore, any development proposals should include provision for the future management of the woodland in accordance with the objectives of the Community Forest.

5.0 CONCLUSION

- 5.1 The site is located to the south west of London Road on the southern periphery of St Albans, and within the Metropolitan Green Belt. It is being promoted for residential development through St Albans District Council's Local Development Framework Process.
- 5.2 The site is well related to the existing residential area and benefits from a robust boundary with the adjoining landscape to the south. It is visually and physically contained in views from the surrounding area by a combination of its dished landform and the dense woodland band at the south eastern site boundary, such that any development at the site will only be discernible from a limited number of local viewpoints in the immediate vicinity of the site. Similarly, owing to the enclosed nature of the site any development will not impact on the character of the adjoining countryside to the south and west, or the adjoining townscape to the north.
- 5.3 In addition, development can be accommodated without impacting on the objectives of the Metropolitan Green Belt, as it is well related to the existing urban area; has clearly defined boundaries; will not result in urban sprawl or coalescence; and, will not impact on the open character of the adjoining landscape.
- 5.4 For the reasons set out in this document, and subject to an appropriate access arrangement to the site, there are no significant landscape constraints to development at this site.

Appendix A

Site Location Plan
CSa/1960/101



Site boundary



Photo Location



Dixies Barns,
High Street, Ashwell,
Hertfordshire, SG7 5NT
t 01462 743647
f 01462 743648
e ashwell@csaenvironmental.co.uk

Project Land adjacent to Verulam Golf Club, St Albans

Title Location Plan with Photo Locations

Client Beechwood Homes

Date May 2012

Scale Not to Scale

Drawn SM

Checked CA

Drawing Number CSa/1960/101

Revision -

Appendix B

Aerial Photograph
CSa/1960/102



 Site boundary

 Photo Location

CSa
 environmental planning
 Dixies Barns,
 High Street, Ashwell,
 Hertfordshire, SG7 5NT
 t 01462 743647
 f 01462 743648
 e ashwell@csaenvironmental.co.uk

Project	Land adjacent to Verulam Golf Club, St Albans
Title	Aerial Photograph with Photo Locations
Client	Beechwood Homes

Date	May 2012
Scale	Not to scale
Drawn	SM
Checked	CA

Drawing Number	CSa/1960/102
Revision	-

Appendix C

Photosheets
CSa/1960/103



Photograph 01



Photograph 02

Project	Land adjacent to Verulam Golf Club, St. Albans
Title	Photosheets
Client	Beechwood Homes

Date	May 2012		
Drawn	RC	Checked	CA

Drawing Number	CSa/1960/103
Revision	-

North Western Site Boundary



Photograph 03

South Western Site Boundary



Photograph 04

Project	Land adjacent to Verulam Golf Club, St. Albans	Date	May 2012		Drawing Number	CSa/1960/103	
Title	Photosheets	Drawn	RC	Checked	CA	Revision	-
Client	Beechwood Homes						



overlap



overlap

Photograph 05



Dixies Barns,
High Street, Ashwell,
Hertfordshire, SG7 5NT
t 01462 743647
f 01462 743648
e ashwell@csaenvironmental.co.uk

Project	Land at Verulam Golf Club, St. Albans	Date	May 2012		Drawing Number	CSa/1960/103	
Title	Photosheets	Drawn	RC	Checked	CA	Revision	-
Client	Beechwood Homes						

Houses at Orient Close



Photograph 06

Public Footpath

South Eastern Site Boundary

Verulam Golf Club Clubhouse



Photograph 07

Project	Land adjacent to Verulam Golf Club, St. Albans
Title	Photosheets
Client	Beechwood Homes

Date	May 2012		
Drawn	RC	Checked	CA

Drawing Number	CSa/1960/103
Revision	-



Photograph 08



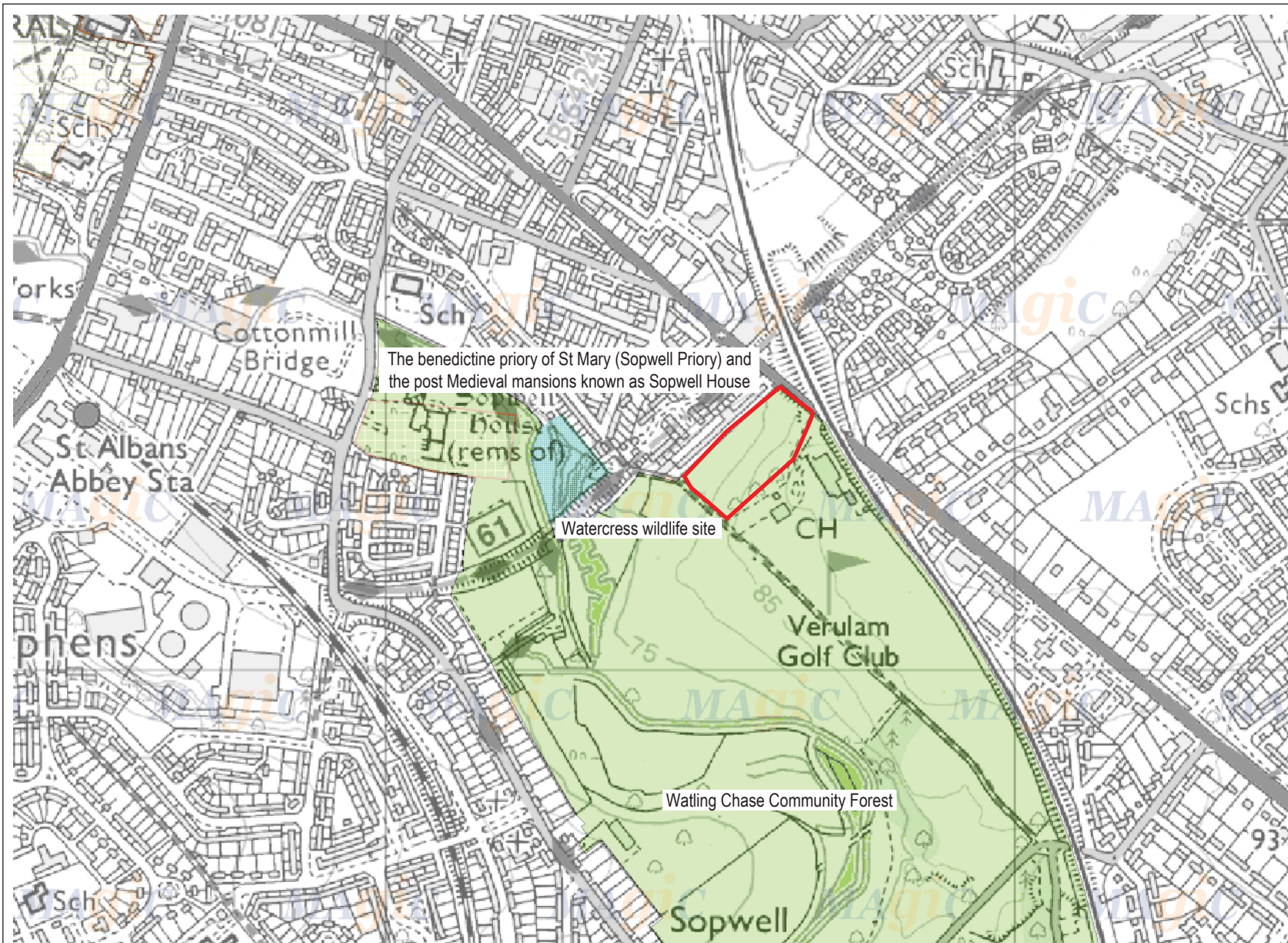
Photograph 09



Photograph 10

Appendix D

Magic Map
CSa/1960/104



- Site boundary
- Local Nature Reserve (LNR)
- Scheduled Monument
- Community Forest



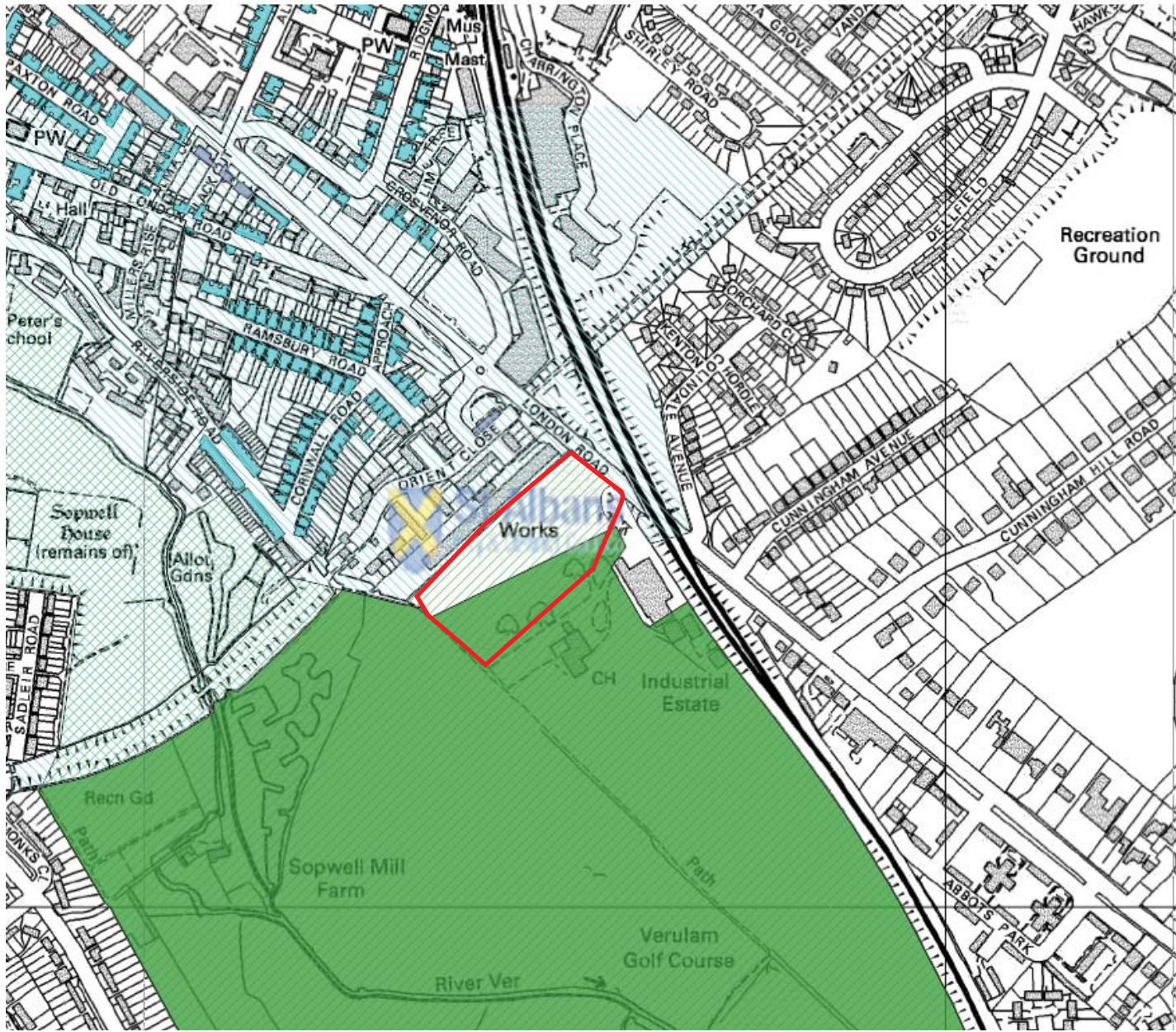
Project	Land adjacent to Verulam Golf Club, St Albans
Title	Magic Map
Client	Beechwood Homes

Date	May 2012
Scale	Not to scale
Drawn	SM
Checked	CA

Drawing Number	CSa/1960/104
Revision	-

Appendix E

Planning Policy
CSa/1960/105



- Site boundary
- Landscape Development Area
- Locally Listed Buildings
- Conservation Area
- Metropolitan Green Belt

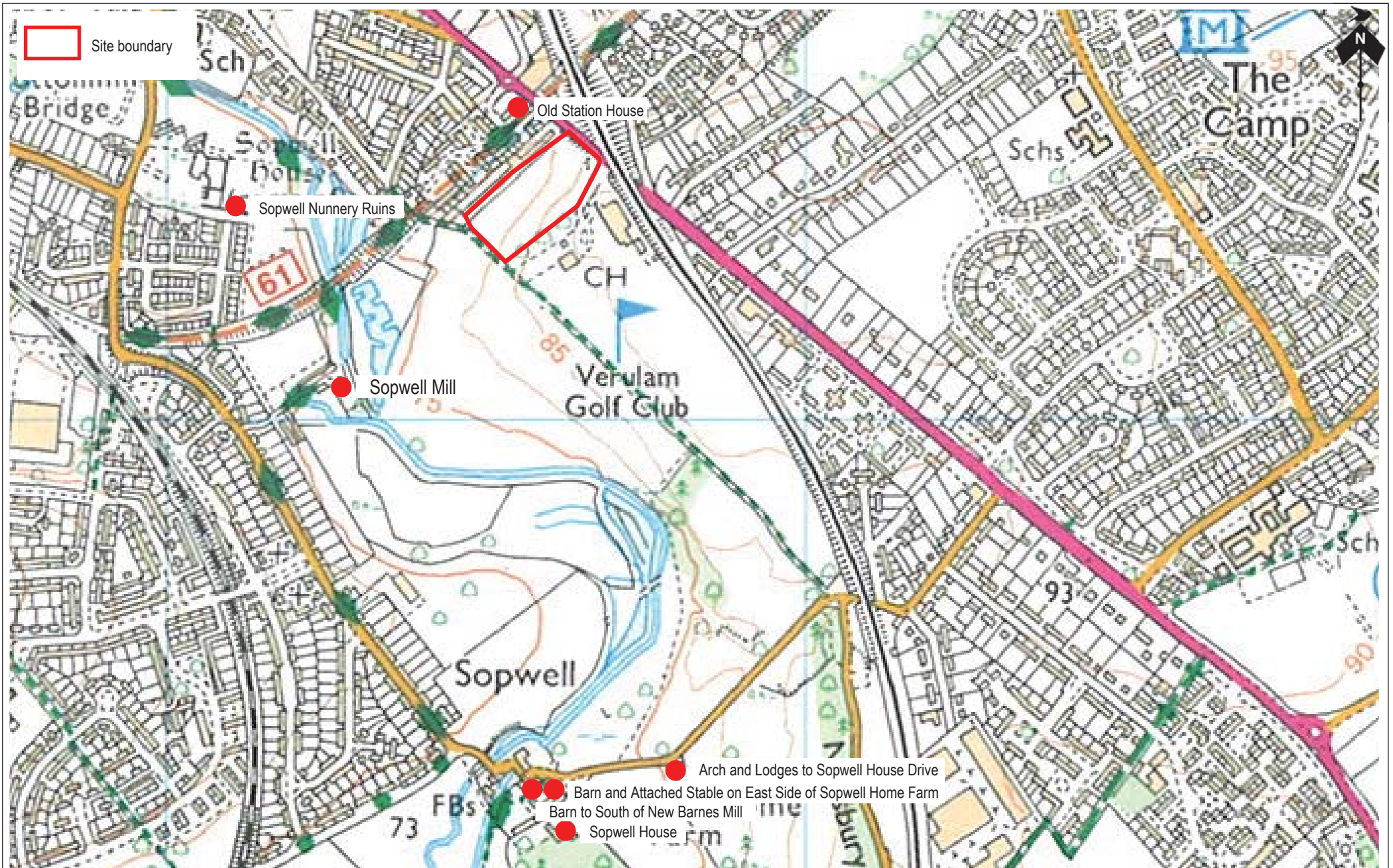
Project	Land adjacent to Verulam Golf Club, St Albans
Title	Planning Policy
Client	Beechwood Homes

Date	May 2012
Scale	Not to scale
Drawn	SM
Checked	CA

Drawing Number	CSa/1960/105
Revision	-

Appendix F

Listed Buildings
CSa/1960/106



Project	Land adjacent to Verulam Golf Club, St Albans
Title	Listed Buildings
Client	Beechwood Homes

Date	May 2012
Scale	Not to scale
Drawn	SM
Checked	CA

Drawing Number	CSa/1960/106
Revision	-

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	<i>Lauren Hawksworth</i>
Company/Organisation	<i>Montagu Evans LLP</i>
Address	<i>70 St Mary Axe, London</i>
Postcode	<i>EC3A 8BE</i>
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)	<i>Verulam Industrial Estate, London Road, St Albans, AL1 1JB</i>			
Site area (in hectares)	<i>0.6 ha</i>			
Coordinates	Easting	<i>515728</i>	Northing	<i>206316</i>
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Landownership (please include contact details if known)	[REDACTED]			
Current land use	<i>Industrial estate – commercial and light industrial</i>			
Condition of current use (e.g. vacant, derelict)	<i>The majority of the units are currently occupied, limited vacancies. The buildings are in a poor state of repair and in need of redevelopment.</i>			
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input checked="" type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)			
Reasons for suggested development / land use	<i>See covering letter</i>			

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

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

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input checked="" type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history) <ul style="list-style-type: none"> • <i>PRE/2020/0055</i> • <i>PRE/2021/0021</i> 	

Other comments	<i>See covering letter</i>
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PD12944

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

8 March 2021

By email only: planning.policy@stalbans.gov.uk

Dear Sir/Madam

**ST ALBANS CITY AND DISTRICT COUNCIL LOCAL PLAN
HOUSING ECONOMIC LAND AVAILABILITY ASSESSMENT (HELAA) – CALL FOR SITES 2021
VERULAM INDUSTRIAL ESTATE, LONDON ROAD, ST ALBANS, AL1 1JB**

On behalf of our client, Advance Holdings Ltd, we submit land within their ownership for consideration in the Council's Housing Economic Land Availability Assessment (HELAA).

This covering note is submitted alongside the Site Identification Form and Existing Site Plan.

The Site and Surrounding Context

Verulam Industrial Estate is located to the south of central St Albans, accessed from London Road. The site comprises a mix of commercial and light industrial buildings, many of which are at the stage of requiring substantial repair or replacement. The existing buildings range in height between 2 – 4 storeys, with associated hardstanding, parking and open storage. There are a number of trees to the site boundaries, creating visual screening between the Site and adjoining land.

To the immediate south and west of the site is Verulam Golf Club, which shares the vehicle entrance from London Road. To the east is the main railway line between London and Bedford, which is situated on an elevated bank. Beyond the railway line and London Road to the east is predominantly residential development. London Road is on a main bus route, within walking and cycling distance of St Albans City Station and close to the City Centre.

The Council have identified through pre-application engagement that the site is a sustainable location for development (pre-application references PRE/2020/0055 and PRE/2021/0021).

Green Belt

Two parts of the Site are currently within the Green Belt as demonstrated on the submitted Existing Site Plan. Both areas of land falling within the Green Belt are previously developed, with buildings, hard surfacing, open storage and vehicle parking associated with the industrial uses on site.

In our view, the land and buildings currently falling within the Green Belt boundary have a limited contribution to the fundamental aim and purposes of the Green Belt. It is submitted that as part of the New Local Plan, the Green Belt boundary should be reviewed in order to rectify anomalies such as the inclusion of brownfield land at Verulam Industrial Estate.

National planning policy states that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Plans should give first consideration to land which has been previously – developed or is well served by public transport (NPPF para 138)

When defining new Green Belt boundaries, plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent (NPPF para 139.f.). The boundaries of the Site at Verulam Industrial Estate are clearly defined by mature trees and hedgerows, which can be protected and enhanced, to establish a new defensible Green Belt boundary in this part of the District.

The Council is currently unable to demonstrate a 5 Year Supply of housing land, and has a high housing target for the future plan period. It is our view that in order to meet the Council's pressing housing delivery target, the Green Belt boundary will require alteration through the strategic plan making process. In accordance with the NPPF, exceptional circumstances exist to justify the release of Green Belt land for development in the District.

The land at Verulam Industrial Estate is previously developed, available for development and can assist with the creation of a new defensible Green Belt boundary.

Proposed Development

The site totals circa 0.6 hectares in size and is an unallocated employment site in Flood Zone 1. It is requested that the site is considered through the HELAA process for redevelopment and removal from the Green Belt (where anomalies in the Green Belt boundary exist) to meet the identified requirements for sustainable development in the District.

The Site would be appropriate for a residential – led mixed use development. The owners of the site have commenced pre-application engagement with Planning Officers in respect of a redevelopment to provide approximately 70 residential apartments, and 1,200 sqm (GIA) of flexible commercial floorspace.

It has been acknowledge through pre-application engagement (PRE/2020/0055) that in accordance with the National Planning Policy Framework (paragraph 11), where the Council cannot demonstrate a 5 Year Supply of housing land, the provision of new housing, in a sustainable location, such as this site, is accorded significant weight in the decision making process. The provision of residential development on site, alongside a smaller quantum of flexible commercial floorspace, is supported in principle.

Conclusions

The land at Verulam Industrial Estate is within our client's ownership, available for development and deliverable within the Plan period. The site owner is currently engaging with the Council through its pre-application service to explore the redevelopment of the site for residential and commercial uses. Pre-application advice received to date is supportive of the principle of development and states that the site is a sustainable location, which would contribute much needed housing for the District.

