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-  Site Boundary
-  Development Area
-  Open Space
-  Existing Landscaping/  
Proposed Landscape Buffers
-  Proposed Trees
-  Site Access/Main Route
-  Secondary Routes
-  Minor Routes
-  Potential Pedestrian/Cycle/  
Emergency Access Links
-  Public Rights of Way
-  Potential Attenuation Ponds
-  Building Frontages



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## **Former Butterfly World, Miriam Lane, Chiswell Green, St Albans**

St Albans Call for Sites response 2021

Planning Report on behalf of Convене Construction Ltd

**DLA Ref: 19/505**

**March 2021**

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## 1.0 INTRODUCTION

1.1 This report is submitted in response to the Call for Sites on behalf of the owners of the Former Butterfly World Site at Miriam Lane, Chiswell Green, St Albans. The site lies adjacent to the Chiswell Green Broad Location for development promoted in the withdrawn Local Plan 2020-36 Publication draft (2018) and is being promoted for release from the Green Belt, either as a freestanding site or in conjunction with the adjoining site.

1.2 The Chiswell Green Broad Location was essentially identified as an urban expansion by the independent Green Belt Studies undertaken in 2013/14. It was subsequently allocated in the withdrawn Plan to deliver at least 365 dwellings and, inter alia, a site for and appropriate contributions towards a two form entry primary school. At the time the Green Belt Studies were undertaken, Butterfly World was still in operation and as a relatively new enterprise was seeking funding to complete construction of the approved 100m wide biome on the Site, which was to be the centrepiece of the attraction. Accordingly, the Green Belt Study would not have given consideration to the inclusion of the Site within the urban expansion area.

1.3 There is an evident and urgent need for additional development sites within St Albans district – both housing and employment.

The Site is promoted as an expansion of the previously promoted Broad Location to help satisfy this need in the following circumstances:

- As a well-contained area of Previously Developed Land, the redevelopment of the Site would not have any material impact on the purposes of the Green Belt and in the context of the accepted need for Green Belt releases to meet the District's future housing and employment needs, the relative impact to openness would be modest. The proposed release would also lead to the creation of defensible Green Belt boundaries.
- The delivery of a two form entry primary school as previously promoted on the original Broad Location Site, yielding just 365 dwellings is highly questionable and the provision of additional housing on the former Butterfly World Site would help to make the scheme more viable and lessen the burden on the public purse.
- There are no other constraints to the delivery of the Site, which would be designed as a permeable/accessible expansion allowing safe access to the excellent range of services within Chiswell Green.

1.4 The site should be allocated for mixed-use development and removed from the Green Belt in the next iteration of the Local Plan.

## 2.0 SITE & CONTEXT ANALYSIS

### 2.1.0 Location

2.1.1 Butterfly World is located on the southern side of Chiswell Green Lane, around 160m from the residential area of Chiswell Green to the east (See figures 2.1.0 & 2.3.0 below).

### 2.2.0 Development Plan Notation

2.2.1 The Proposals Map of the District Local Plan Review 1994 shows the Site within the Metropolitan Green Belt, to the west of the Specified Settlement of Chiswell Green.

### 2.3.0 The Site

2.2.1 This comprises a Site of nearly 11ha. As detailed in Section 4.0 below, planning permission was granted in February 2005 for the erection of a building for the exhibition of butterflies and plants in association with the adjacent Gardens of the Rose Site to the west (LPA Ref: 5/2003/1343).

2.2.2 The approved buildings had a floorspace of nearly 10,000m<sup>2</sup>, to include a rainforest biome with a diameter of 100m, which would have provided a habitat for butterflies and tropical plants. The biome included a public walkway, caves and watercourses and ancillary visitor and education facilities, such as a shop, coffee shop, restaurant and lecture theatre provided

over 2-storeys. A total of 405 car parking spaces and a 12 space coach park were proposed. A new access was provided from Noke Lane to the south, via Miriam Lane, with that from Chiswell Green Lane, comprising the emergency site access.

2.2.3 The permission was implemented in 2008 and the attraction opened in 2009. The foundations for the biome were constructed, but it has not been completed due to funding issues, with a number of now expired temporary permissions granted for the provision of short term alternative ancillary visitor accommodation (See Section 4.0). The use ceased operation at the end of 2015.

2.2.4 Notwithstanding the above, it is clear that the 2005 planning permission has been implemented, such that the biome could still be completed. As such the Site constitutes Previously Developed Land (PDL) as defined by the NPPF. In addition to the partially constructed biome, there are also other structures relating to the attraction, such as large plant pots, walls housing bug homes, plus significant ground works and areas of hardstanding for footpaths. Account must also be taken of the two large areas of hardstanding within the northern part of the site accommodating car parking and bus stop areas.

2.3.0 **Context**

2.3.1 To the west the Site abuts The Mansion House and the surrounding Gardens of the Rose, with agricultural land beyond. St Albans Polo Club occupies the largely open land to the northern side of Chiswell Green Lane. Further agricultural land bounds the site to the south and west.

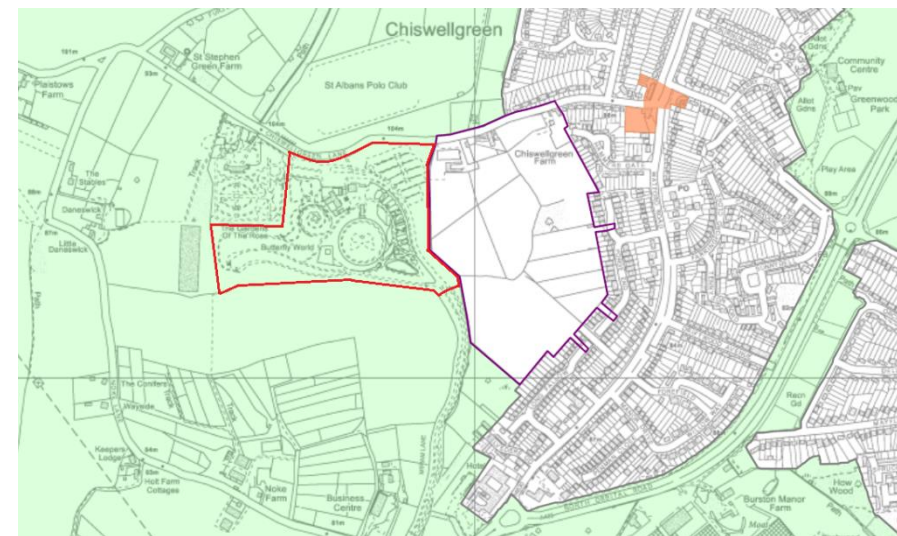
2.3.2 Immediately to the east, Chiswell Green Riding School fronts onto Chiswell Green Lane, with a short terrace of houses set perpendicular to the road beyond, which in turn adjoins Chiswell Green Farm. The land to the rear of this frontage development, set between the suburban development to Chiswell Green to the east and Butterfly World to the west is open in character.

2.3.3 This parcel of predominantly open land was identified in the withdrawn Local Plan 2020-36 Publication draft (2018) as the West of Chiswell Green Broad Location, as outlined in purple on both the aerial view and extract from the withdrawn Local plan proposals map opposite, essentially in-filling the gap between the existing western settlement boundary and Butterfly World, to provide a significant urban expansion. The Site was identified by an independent Green Belt study.

**Fig 2.1.0:** Aerial view of the site and surroundings



**Fig 2.3.0:** SADC Withdrawn Local Plan Proposals Map Extract



2.3.4 Policy S6 of the withdrawn plan promoted the Broad Location on the basis that it would deliver - inter alia - at least 365 dwellings; recreation space and public open space; a site for and appropriate contributions towards a 2 form entry primary school; and Transport network (including walking and cycling links) and public transport services upgrades/improvements.

2.4.0 **Local services**

2.4.1 The Site is well related to the excellent range of services within Chiswell Green as shown in the Table opposite. The distances shown are based on routes from the centre of the Site along Chiswell Green Lane, however it is noted that as an extension to the previously proposed Chiswell Green Broad Location, there would be opportunities to deliver safe pedestrian and cycle access through the adjacent proposed residential area.

2.5.0 **Accessibility**

2.5.1 The Report Site is well served by public transport services. There are a number of Bus stops along Watford Road (B4630) to the east of the Site, which would similarly become safely accessible if the Site was developed as part of the wider Broad Location. The Watford Road bus stops are served by the 321 and 724 bus routes. The former has regular services between Luton and Watford; the latter regular services between Harlow and Heathrow Airport.

**Fig 2.4.0:** Local Facilities

Facility	Local Provision	Proximity to site (km)
<b>Education</b>	Killigrew Primary School	1.6km
	Marlborough Science Academy	2.9km
<b>Retail</b>	Co-op Supermarket	1km
	Convenience Store	1km
	Post Office	1.1km
<b>Health</b>	Midway Doctors Surgery	1.6km
	Pharmacy	1km
	Dentist	1km
<b>Sport/Leisure</b>	Public Footpath Route 21	500m
	Public Footpath Route 28	600m
	Public Footpath Route 44	250m
	Public House	1km

2.5.2 How Wood Railway Station is around 3km to the south-east of the Site. Alternatively, the 321 and 724 bus routes both stop at St Albans Abbey railway station.

## 3.0 STRATEGIC CONTEXT

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

### Housing need

- 3.3 The reliance on a Local Plan adopted in 1994 and the housing policies and land allocations therein has had a catastrophic effect on housing delivery within the district. With an annual housing target of around 900 homes per year and annual housing completions since 2001 running at 376 homes per year, a whole generation of young people have been largely unable to access the housing market. Recent performance can be judged by the latest Housing Delivery Test results for St Albans District (published in February 2021), which indicated a HDT measurement of only 63% for the period 2017/18 to 2019/20 – the 33<sup>rd</sup> worst of the 298 local authorities in England.
- 3.4 While housing completions have, to a degree, been propped up by recent changes to permitted development rights, these have not had an impact on the delivery of affordable housing. The target of 200 affordable homes per year from the 1994 Local Plan has not been met. Since 1994, 1,826 affordable homes have been delivered, against a target of 5,200 – only 34% of the target and a shortfall of 3,374 affordable homes. In 2019/20, only 31 affordable homes were completed – just 7% of total completions.



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

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

3.6 To meet housing need will require the delivery of a mixed portfolio of housing sites. A range of sizes, types and locations will be needed to enable a wide range of housebuilding organisations to contribute to meeting needs, including arrangements for self-build properties.

#### **Employment land**

3.7 There has been an enormous net loss of employment floorspace in the district in recent years. Very little new land has been made available and the existing stock continues to be depleted through change of use applications or permitted development proposals. It is vital that the new Local Plan makes provision for sufficient employment land to facilitate economic growth alongside housing growth.

3.8 However, it is important that a mix of sites is included in the Plan. The retention of the Strategic Rail Freight Interchange proposal in the plan will provide for some new employment land but only caters for a particular type of occupier. Similarly, provision of strategic warehousing east of Hemel Hempstead

will also help the economy but will not meet the needs of all employers. A range of sizes , types and locations are needed.

#### **Previously Developed Land**

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

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

3.10 The Inspectors examining the withdrawn Local Plan were critical of the Council’s site assessment as it did not consider Previously Developed Land (PDL) or apply any specific focus on PDL. As a result of the site selection process, any PDL site or site in a sustainable location well served by public transport in the Green Belt below the size threshold had been discounted for consideration by the Council.

3.11 It was concluded that this approach failed to give first consideration to PDL land and/or that which is well served by public transport in the Green Belt, and the required process of prioritisation was not evident contrary to paragraph 138 of the NPPF.

## 4.0 PLANNING HISTORY

### 4.1.0 Site

4.1.1 The table below summarises the relevant planning history for the Site.

LPA Reference	Proposal	Decision
5/2003/1343	Erection of building for the exhibition of butterflies and plants in association with the Gardens of the Rose with related horticultural training and research complex, visitors centre, cafeteria, coach/car parking and access drive	Conditional Approval - 30/04/2003
5/2008/2877	Erection of toilet block, display space and services buildings ancillary to Butterfly World Biome	Conditional Approval - 06/02/2009 Temporary permission for 3 years
5/2008/2878	Erection of twelve temporary buildings to provide catering and retail facilities and butterfly exhibition	Conditional Approval - 06/03/2009 Temporary permission for 3 years
5/2010/0872	Temporary replacement of café and shop with study centre and breeding house	Conditional Approval - 16/06/2010 Temporary permission for 5 years
5/2014/3465	Variation of Condition 1 (time limit) of planning permission 5/2008/2877 for the Erection of toilet block, display space and services buildings ancillary to Butterfly World Biome to allow the retention of the buildings until 16/06/2019 and the retention of minor changes to buildings.	Conditional Approval – 10/04/2015 Temporary permission for 2 years
5/2014/3466	Variation of condition 1 (time limit) of planning permission 5/2008/2878 for the erection of twelve buildings to provide catering and retail facilities and butterfly exhibition to allow the retention of the buildings until 16/06/2019 and the retention of minor changes to buildings	Conditional Approval – 10/04/2015 Temporary permission for 2 years
5/2014/3467	Variation of condition 1 (time limit) of planning permission 5/1020/0872 for the temporary replacement of café and shop with study centre and breeding house to allow the retention of the buildings until 16/06/2019 and the retention of minor changes to buildings – retrospective	Conditional Approval – 10/04/2015 Temporary permission for 2 years
5/2014/3464	Construction of indoor eating area and siting of five container units (incorporating café staffroom, cafe office and three storage units) to allow the retention of the buildings until 16/06/2019 and the retention of minor changes to buildings- retrospective.	Conditional Approval – 08/03/2016 Temporary permission for 2 years

## 5.0 GREEN BELT REVIEW FINDINGS

### 5.1.0 Green Belt Review 2013 / 14

5.1.1 The promotion of the Chiswell Green Broad Location in the withdrawn Local Plan 2020-36 Publication draft (2018) was informed by independent Green Belt Reviews undertaken in 2013 and 2014.

5.1.2 The Part 1 Study in 2013 assessed all the Green Belt land in St Albans District and identified eight strategic sub-areas which contributed least towards Green belt purposes. Five purposes were identified, with Nos 1 to 4 being the first 4 of the 5 identified by the NPPF, with an alternative fifth local purposes identified:

- NPPF Purpose 1: To check the unrestricted sprawl of large built-up areas;
- NPPF Purpose 2: To prevent neighbouring towns from merging into one another;
- NPPF Purpose 3: To assist in safeguarding the countryside from encroachment;
- NPPF Purpose 4: To preserve the setting and special character of historic towns; and
- Local Purpose: To maintain the existing settlement pattern.

5.1.3 The Report Site and the subsequently identified Broad Location fell within one of 8 Strategic sub-areas contributing least to Green Belt Purposes as follows:

*“SA-S8 – Enclosed land at Chiswell Green Lane at Chiswell Green (GB25). The strategic parcel significantly contributes towards 2 of the 5 Green Belt purposes whereby it safeguards the countryside and maintains the existing settlement pattern (providing gap between St Albans and Chiswell Green). It also makes a partial contribution towards preventing merging and preserving setting. However the sub-area identified on pasture land at Chiswell Green Lane displays urban fringe characteristics due to its proximity to the settlement edge and Butterfly World along Miriam Road to the west. This development bounds the outer extent of the pasture land and creates a physical barrier to the open countryside. The pasture land also displays greater levels of landscape enclosure due to localised planting along field boundaries. This creates potential to integrate development into the landscape with lower impact on views from the wider countryside and surroundings. At the strategic level, a reduction in the size of the parcel would not significantly compromise the overall role of the Green Belt or compromise the separation of settlements. Assessed in isolation the land makes a limited or no contribution towards all Green Belt purposes.”*

5.1.4 The Part 2 Study sought to deliver a review that provided ‘a *detailed and robust assessment*’ of the strategic sub-areas, and amongst other things, to identify potential sites (with boundary lines) within the strategic sub-area for potential release from the Green Belt for future development. To this end, nine sites for potential Green Belt release and future development were identified from the eight sub areas; with the Chiswell Green Broad location comprising Site 8

5.1.5 The nine Sites were assessed with regard to the following four factors:

- Contribution towards the five Green Belt purposes;
- Environmental and historic constraints;
- Integration with existing urban areas; and,
- Landscape sensitivity.

5.1.6 The Study concluded that all nine Sites were considered potentially suitable for release within the emerging Local Plan period, with Chiswell Green being the highest ranked Site.

5.1.7 Based on the analysis, the Study concluded that the eastern section of the sub area, as shaded yellow on the indicative layout drawing opposite (Fig 5.1.7) was the most appropriate for potential Green Belt release for residentially led development, and which reflects the extent of the Broad Location for Development promoted in the withdrawn Plan.



5.1.8 In addition to the aforementioned Part 1 conclusions in respect of contribution to Green Belt purposes, the Part 2 study offered the following conclusions in support of the identification of the Site for release.

- **Constraints** No environmental, historic constraints were identified within the sub area.
- **Sustainable Pattern of Development** The proximity of Chiswell Green as a specified settlements and in particular the local centre and primary school was noted.
- **Landscape Appraisal & Sensitivity** The study concluded that the eastern part of the Site set between the Chiswell Green western settlement boundary and butterfly World had a lower landscape and visual sensitivity.

5.1.9 In considering the conclusions of both parts of the Study - particularly with reference to Green Belt purposes and Landscape & Visual Sensitivity - it is important to note that at that time – 2013/14 - not only was the Butterfly World Site not being promoted for residential redevelopment, it was a relatively newly established tourist enterprise which was actively seeking funding to secure the completion of the approved biome. To this end it is unlikely that any consideration was given to the integration of the Site into the Broad location.

5.1.10 Notwithstanding this, it is clear that the extent of the Broad Location was defined by the proximity of Butterfly World as a substantial area of PDL, forming a barrier from the wider area of open countryside beyond to the west. To this end it is considered that the Report Site itself forms part of this more constrained, urban fringe area. Thus in addition to the Part 1 conclusions set out at paragraph 5.1.3 above, the following Part 2 conclusions in respect of landscape and visual sensitivity are noted:

*“Levels of enclosure*

*Enclosure is provided by a combination of landform and vegetation. The gradual slope of the landform limits the enclosure it provides, but this is augmented by the artificial landform that surrounds and encloses Butterfly World. Vegetation provides enclosure to a varying degree. To the north, east and south-east (excluding Butterfly World) the field pattern is medium to large, which combined with the poor/declining hedgerow pattern gives rise to quite an open landscape, with views across the agricultural landscape. The bunding surrounding Butterfly World creates considerable local enclosure; in time, the young planting on these landforms will reinforce this. The area between Chiswell Green and Butterfly World includes small woodlands, copses and hedgerows, which (together with the made landforms around Butterfly World), provide a greater sense of enclosure....*

#### *Visual attributes*

*Roads are frequently lined by tall hedges (although in places these are fragmented), which restricts views. Towards the western part of the sub-area, the open views over the agricultural landscape are notable. Views are much shorter in distance within the eastern part of the sub-area (between Butterfly World and Chiswell Green) due to a combination of local landform and vegetation....*

#### *Landscape sensitivity*

*The nature of the landform and landscape pattern creates a distinctly different feel in different parts of the sub-area; with land to the east being more enclosed and land to the west being much more open and larger in scale. To the east of Butterfly World (and the associated access) a sense of enclosure provided by small areas of woodland, remnant hedgerows and local landform gives rise to a smaller scale landscape. However, further west, the landform together with poor condition of field boundaries results in an open landscape that blends into the wider countryside.*

*Key landscape features that make a valuable contribution are the small areas of woodland to the west of Chiswell Green and remaining hedgerows. The eastern part of the sub-area is of lower sensitivity due to its relationship with the adjacent urban edge, the loss of field pattern and its isolation from surrounding countryside by Butterfly World. The land in the western part of*

*the sub-area is more sensitive due to its relative openness and visual connection with the wider countryside.”*

- 5.1.11 In the light of the above conclusions, it is considered highly probable that the Green Belt Studies would have given serious consideration to the integration of the Site into the Broad Location had it been clear at the time that the Butterfly World Enterprise World had failed and that the land was available for residential development.

## 6.0 SITE CONSTRAINTS

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

### 6.2.0 Contamination/Pollution

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

### 6.3.0 Environmental issues

There are significant environmental constraints as confirmed by the 2013/14 Independent Green Belt studies.

### 6.4.0 Flood risk

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

### 6.5.0 Topography

The site is reasonably level such that large amounts of spoil would not need to be removed.

### 6.6.0 Utility services

It is likely that utilities are available in the adjacent suburban area to the east, to which a connection could easily be made.

### 6.7.0 Legal issues

The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the Site would be master planned and delivered with the adjacent area to the east previously included within the Chiswell Green Broad Location.

### 6.8.0 Access

Access would be available from Miriam Lane. An Initial Highways and Transportation Assessment has been prepared on behalf of the landowner and is submitted as part of the promotion of the Site (see Appendix A). This proposed that the Noke Lane/A405 junction be signalised and allow all traffic movements. The Assessment concludes that this would have a positive effect on both the Noke Roundabout and the M25 J21A, by removing U-turning traffic from both. As such, both these key junctions are likely to see some improvement in operation. Computer simulation testing of this junction has been undertaken and the results show that the revised signalised junction could accommodate up to 125 dwellings.

6.9.0 **Other constraints**

There are no other significant constraints as confirmed by the Independent Green Belt studies.



## 7.0 OUTLINE OF PROPOSAL

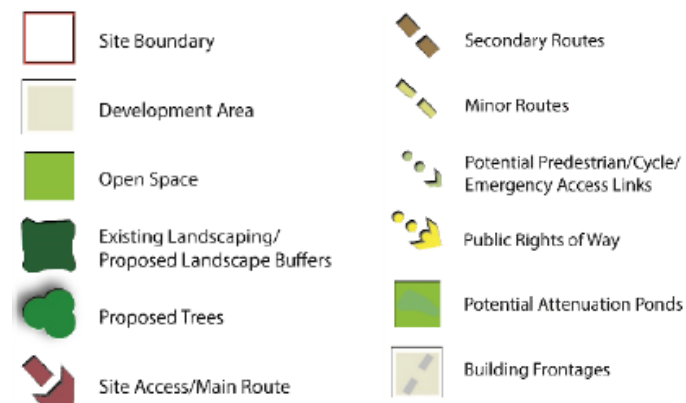
7.1.0 As part of the landowner's previous representations in 2018 to the withdrawn Local Plan, a Concept Masterplan was submitted and which forms part of the current representations. The Site would be developed as an extension to Chiswell Green Broad Location. If the site were developed wholly for residential use around 125 dwellings could be delivered, in addition to the 365 dwellings proposed at the adjoining site. However, the site could also be used in part for employment with its excellent access to the strategic road network. The amount of development proposed reflects the junction capacity issues noted at 6.8.0 above and accordingly the proposal utilises the Miriam Lane access from Noke Lane to the south and would require that the Noke Lane/A405 junction be signalised. In compliance with the requirements of the withdrawn Local Plan, it would deliver 40% affordable housing.

7.2.0 The Masterplan would incorporate the following key elements:

- **Western and Southern Green Edge** Retained and new landscaping and open space will help form a new green edge to Chiswell Green, softening the visual impact of any new development, thus aiding the transition between an urban and rural context and providing areas for informal sport and recreation.



**Fig 5.1.7 :**  
Concept  
Masterplan  
Source RPS  
Oct. 2018



- **Green Network** Linked areas of public open space are proposed to the north adjacent to the Chiswell Green Lane frontage, to the south at the vehicular access to the site and centrally within the proposed built development.
- **The Retention of Existing Landscape Features** As much of the existing landscape features on site will be retained and enhanced.
- **Permeable Movement Network** The development will also provide pedestrian and cycling links to the adjacent previously allocated residential area helping to allow the excellent range of local services in Chiswell Green to be safely utilised as well as the regular bus services provided along Watford Road. Pedestrian links will also be provided to the Public Rights of Way to the west and north.

## 8.0 GREEN BELT IMPACT

8.1.0 Paragraph 134 of the NPPF states that the Green Belt serves five purposes. These five purposes have been set out below with an assessment on the site's contributions to each purpose.

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

Even if Chiswell Green were considered a large built-up area, the exclusion of the Site would not lead to any unrestricted sprawl, the Site comprising previously developed land, which is well contained and defined by existing landscape features and with development extending no further westwards than the former Gardens of the Rose site.

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

The Site is located to the west of Chiswell Green and with the nearest town to the west, Hemel Hempstead, located some 6 km distant and with the nearest town to the south-west, Watford, located some 3km to the south-west. Consequently, the development of the Site will not lead to any merging of towns.

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

Prior to its closure the Site was a 'brown signed' visitor attraction, capable of accommodating up to 1 million visitors each year. As much of the enabling work to provide such visitor numbers has been implemented, the Site is no longer countryside and so Purpose 3 is not engaged.

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

St Albans, as an historic town, is located 2km to the north-east and separated from the Site by Chiswell Green itself and the St Albans suburb of the Verulam Estate. Due to this intervening development and separation distance the release of the Site from the Green Belt will have no impact on Purpose 4.

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

As the Site is vacant PDL it is in need of recycling. Consequently its release from the Green Belt to aid this process would not conflict with this Purpose.

8.6.1 The above conclusions reflect those set out the 2013/2014 Independent Green Belt study outlined in Section 5 above, which identified Butterfly World as a barrier to the more open and less enclosed pasture land to the west, with the land to the east displaying urban fringe characteristics and having lower visual and landscape sensitivity. These factors lead the Study to conclude that the area to the west of Chiswell Green, enclosed by Butterfly World to the east *'makes a limited or no contribution towards all Green Belt purposes'*. Had the Study considered the Report Site to be available at the time as it is now, it is highly probable that it would have drawn a similar conclusion given its status as PDL.

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

#### 8.7.0 **Summary of harm to Green Belt**

Paragraph 133 of the NPPF stipulates that *'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'*. Thus, whilst openness is an essential characteristic, in assessing its importance this cannot be divorced from the overriding aim of preventing urban sprawl. This notion is supported by paragraph

139 of the Framework, with regard to Green Belt boundaries. This states that when defining boundaries, local planning authorities should, inter alia, *'not include land which it is unnecessary to keep permanently open'*.

8.7.1 As demonstrated elsewhere on the basis that the Site contains screen bunds; very large concrete 'flower pots', roads, extensive car /coach parks and; the 100m diameter base for the partially constructed biome, it is considered that the Site constitutes PDL. As such, in a scenario where there is an accepted need for significant Green Belt releases to meet the District's identified needs, the relative harm resulting from the development of this PDL site must carry significant weight, particularly given the absence of any harm to the purposes of the Green Belt.

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

#### 8.8.0 **New position of Green Belt Boundary**

If released and developed with the previously promoted Chiswell Green Broad Location, the Site would provide a defensible Green Belt boundary. The Site fronts Chiswell Green Lane to the north, whose hedged carriageway would form a defensible Green Belt boundary. To the west is the former Gardens of the Rose visitor attraction, whose landscaped

grounds form a western defensible boundary. To the south of the main body of the Site is a hedgerow and the landscaped bunds constructed as part of the former Butterfly World site and which in turn forms a southern defensible boundary.

## 9.0 DELIVERABILITY

9.1 In preparing the withdrawn Local Plan 2020-36 Publication draft (2018) the general approach adopted by the Council in selecting strategic sites was to only assess sites of 500 dwellings or more. That the west of Chiswell Green Broad Location was selected despite only accommodating 365 dwellings is due to its identification by the aforementioned Independent Green Belt Studies.

9.2 The fact that the Broad Location falls below the 500-dwelling threshold is not problematic – on the contrary, it is considered that the Council’s strategy is unsound because of the lack of smaller sites. However, the delivery of a two form-entry (2FE) primary school as previously proposed from a site of 365 dwellings is highly questionable and it is this element that needs modification.

9.3 Accordingly the delivery of the Chiswell Green Broad as proposed by Policy S6(X) of the withdrawn Plan. Location was not considered deliverable, and therefore not sound, because it is based on the delivery of a 2FE primary school when, according to the Hertfordshire County Council ‘rule of thumb’, the site itself only generates 0.73FE worth of pupils. CIL Regulations prevent the Council from requiring the developer to provide more than their fair share (i.e. anything

not ‘directly related to the development’ and ‘fairly and reasonably related in scale and kind to the development’). Pre-submission representations from the owners of the proposed S6(X) site were careful to limit the extent of developer contributions and the role of the CIL Regulations:

*“With regard to the delivery of the school, an appropriate CIL or S106 education contribution in accordance with Reg. 122 of the CIL Regulations will be provided.” (para 4.9)*

and

*“We consider that this proposal for the provision of land to accommodate a 2FE primary school, together with an appropriate level of funding for the school commensurate with the impact arising from the Site’s development would offer a substantial community benefit to the locality, in view of the established deficit in primary school places and the identified challenges in expanding existing schools.” (para 4.10)*

9.4 There is thus a substantial funding shortfall in delivering the required primary school. Any proposal to make the site larger would therefore help to make the scheme more viable and lessen the burden on the public purse.

9.5 The land being promoted at Butterfly World is nearly 11ha in size and is being promoted for up to 125 dwellings. This scale of additional development would make a substantial contribution

to solving the school funding gap and making the West of Chiswell Green Broad Location deliverable.

## 10.0 CONCLUSIONS

10.1 This report is submitted in response to the Call for Sites on behalf of the owners of the Former Butterfly World Site at Miriam Lane, Chiswell Green, St Albans. The site is being promoted for release from the Green Belt, either in isolation or in conjunction with the adjoining Chiswell Green Broad Location for development promoted in the withdrawn Local Plan 2020-36 Publication draft (2018).

10.2 The Chiswell Green Broad Location was essentially identified as an urban expansion by the independent Green Belt Studies undertaken in 2013/14. It was subsequently allocated in the withdrawn Plan to deliver at least 365 dwellings and, inter alia, a site for and appropriate contributions towards a two form entry primary school. At the time the Green Belt Studies were undertaken, Butterfly World was still in operation and as a relatively new enterprise was seeking funding to complete construction of the approved 100m wide biome on the Site, which was to be the centrepiece of the attraction. Accordingly, the Green Belt Study would not have given consideration to the inclusion of the Site within the urban expansion area.

10.3 There is an evident and urgent need for additional development sites within St Albans district. The Site is promoted as an

expansion of the previously promoted Broad Location to help satisfy this need in the following circumstances:

- As a well contained area of Previously Developed Land, the redevelopment of the Site would not have any material impact on the purposes of the Green Belt and in the context of the accepted need for Green Belt releases to meet the District's future housing and employment needs, the relative impact to openness would be modest. The proposed release would also lead to the creation of defensible Green Belt boundaries.
- The delivery of a two form-entry primary school as previously promoted on the original Broad Location Site, yielding just 365 dwellings is highly questionable and the provision of additional housing on the former Butterfly World Site would help to make the scheme more viable and lessen the burden on the public purse.
- There are no other constraints to the delivery of the Site, which would be designed as a permeable/accessible expansion allowing safe access to the excellent range of services within Chiswell Green.

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



11.0 APPENDIX A – INITIAL HIGHWAYS AND  
TRANSPORTATION ASSESSMENT

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## 'Brownfield' Land at Noke Lane, Chiswell Green, St Albans AL2 3NY

### Initial Highways and Transportation Assessment

Prepared on behalf of Convene Construction Ltd

March 2020

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#### Introduction and Background

This note has been prepared by Milestone Transport Planning Ltd (MTP) on behalf of Convene Construction Ltd (the Client) to form an initial 'opportunities and constraints' assessment on the highways and transportation impact of regenerating the 10.86 hectare site occupied by the former 'Butterfly World' tourist attraction off Noke Lane, Chiswell Green, St Albans AL2 3NY, which closed at the end of 2015.

This focus of this note is to review the quantum of development that could be delivered on the site, should it not be reopened to the public. As such, an assessment has been made to identify what could be brought forward without significant impact on the surrounding highway network, before suggesting some improvements that may be able to enable further development on the site.

#### Site Location and Existing Access Strategy

The site, as shown in Figure 1, is located to the west of the existing residential areas of Chiswell Green, bounded by Chiswell Green Lane to the north, and agricultural fields to all other sides, including 'The Garden of the Rose' visitor attraction to the west (understood to also be closed to the public), Chiswell Green Livery Yard to the east and Miriam Lane to the south.

The site itself consists of the former Butterfly World tourist attraction, which includes all existing buildings, car parks and open spaces associated with this use. Access is primarily gained from a gated vehicular and pedestrian entrance at the end of Miriam Lane, which is owned by Hertfordshire County Council but not open for public use. The site has a right of access across this lane to Noke Lane in the south.

Miriam Lane connects to Noke Lane by way of a simple priority T-Junction which was improved as part of the previous use to allow for two-way vehicular traffic, a segregated pedestrian route into the site and also equestrian use. Figure 2 shows the existing junction layout.

Additional access to the site can be gained through a vehicular entrance onto Chiswell Green Lane, as shown in Figure 1. This access is also gated and was used by Butterfly World only as an emergency vehicle access, to limit the impact of visiting cars and coaches on the surrounding residential properties.

Access to the wider area is provided via the junction with Noke Lane and the A405 North Orbital Road, south east of the site. This 'left-in, left-out' arrangement, as shown in Figure 3, ensures all vehicular traffic leaving the site travel north on the A405 to the 'Noke Roundabout'. Traffic entering the site has to do so from the M25 Junction 21A roundabout, to the south.

Figure 1 Site Location



The Noke Lane junction also accommodates a similar left-in, left-out arrangement to Lye Lane, on the south eastern site of the junction, whilst providing crossing facilities for equestrians, with a central reserve refuge linking two bridleways on either side of the A405, also shown in Figure 3.

Figure 2 Existing Main Site Access

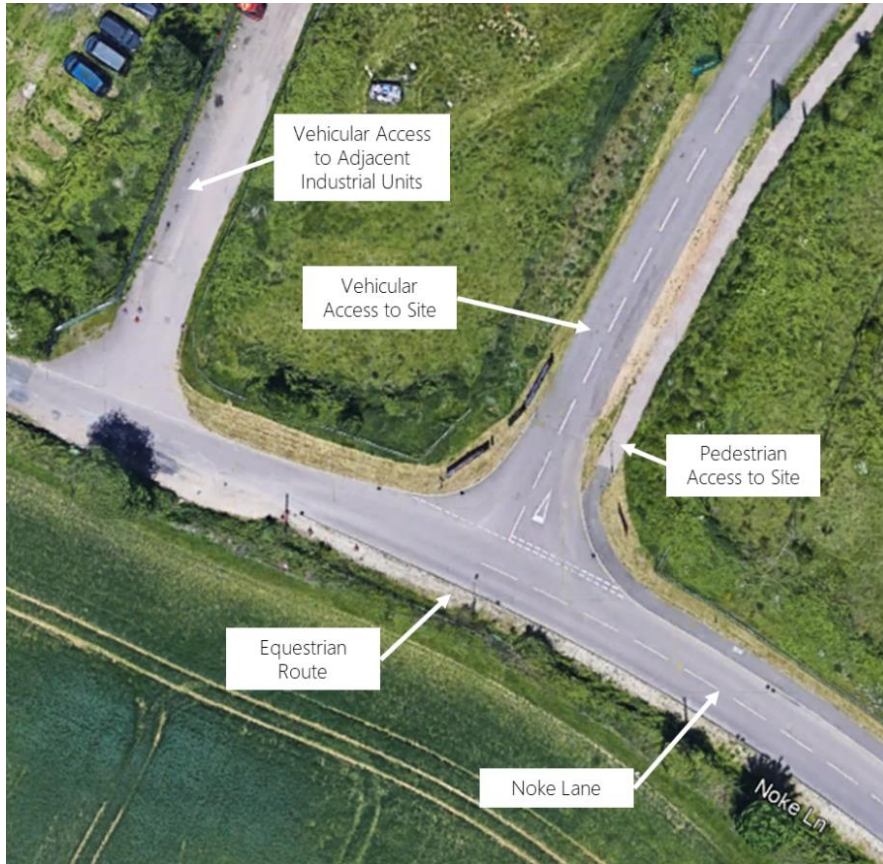
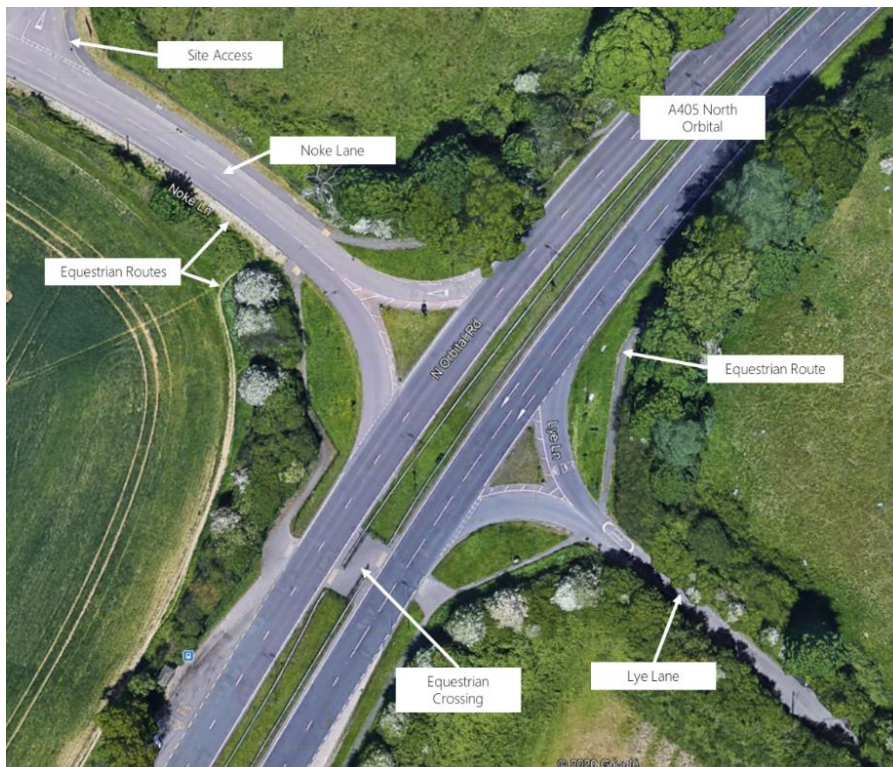


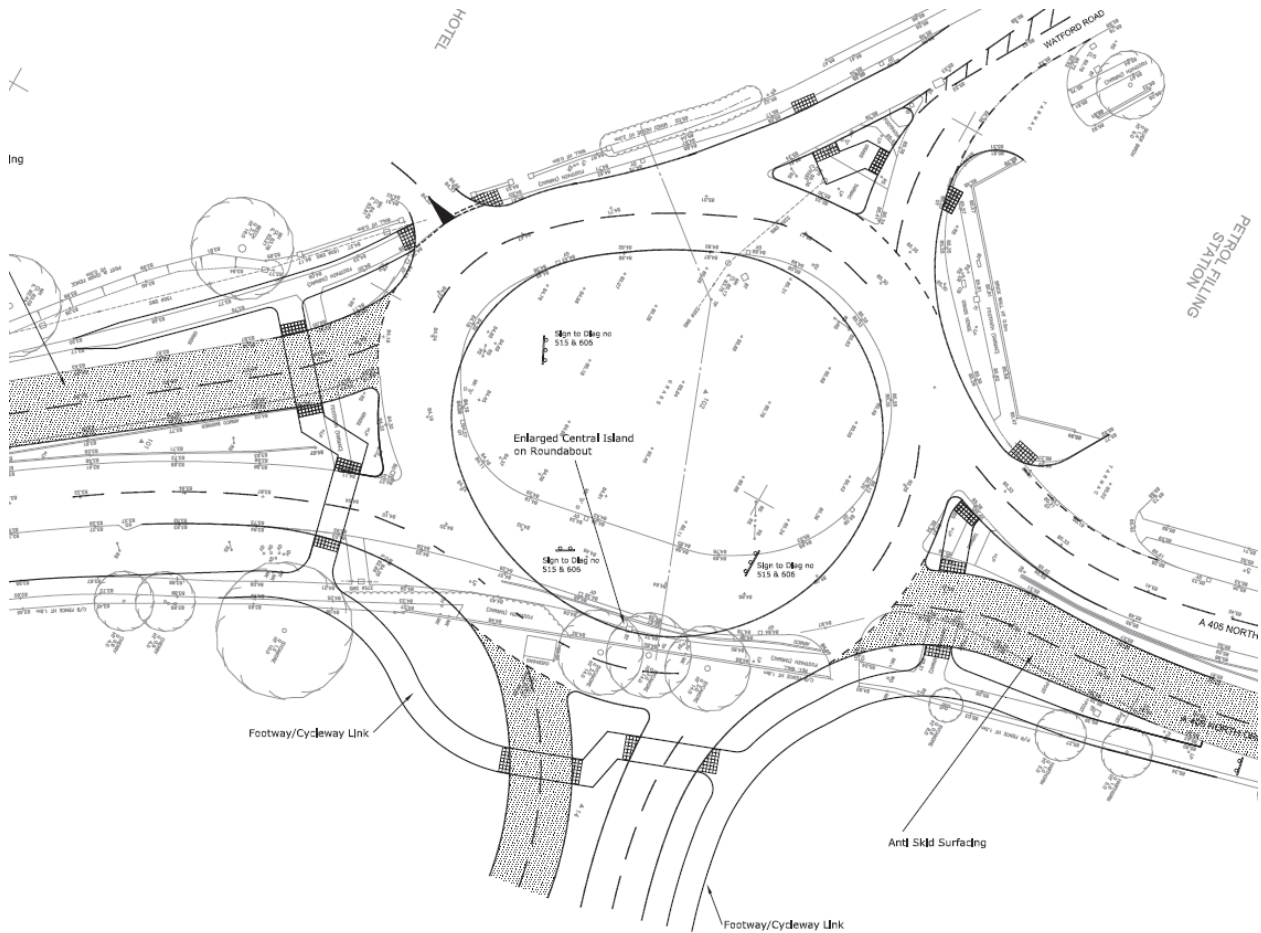
Figure 3 A405 / Noke Lane Junction



To the north, the A405 Noke Roundabout is a four-arm roundabout which provides access to the Mercure Hotel, Watford Road and onward connections via the A405.

The roundabout is subject to a committed improvement scheme associated with a new hotel development to the south (planning reference 5/2015/0722), known as 'Copsewood'. This approved application alters the arrangement of the roundabout to allow a fifth arm to the south, which is intended to provide the main vehicular access to the new hotel development, as shown in Figure 4.

Figure 4 Noke Roundabout 'Committed' Improvement Scheme



South of the Noke Lane junction, the A405 meets the M25 at Junction 21A. This large, grade separated, roundabout provides access to the M25 in both directions, as well as the A405 to the south, which allows connections to the M1, via its Junction 6.

It is understood that the M25 Junction 21A is subject to an improvement scheme, promoted by Highways England. However, no firm details of what this scheme consists of are available at present.

## Previous Use

The Butterfly World attraction was granted planning permission in 2005 (planning reference 5/03/1343) and was expected to attract up to 250,000 visitors per year. However, due to increasing costs and lower-than-predicted visitor numbers, it closed in late 2015.

The planning permission for the site required the improvement of the Noke Lane / Miriam Lane junction, as shown in Figure 2, in order to accommodate the expected number of visitors to the site.

The Transport Assessment which accompanied the application focused on considering the impact of the development based upon the maximum number of visitors that the site may generate on its busiest day – given as Easter Monday. As the site was not proposed to open until after the weekday morning network peak period had subsided, and very little traffic was expected during the evening peak period, these traditional assessment periods were largely ignored.

As such, when the Copsewood hotel proposal needed to assess the traffic generation of Butterfly World in 2015, after it has closed but it's future was unknown, the applicant used traffic survey data from similar sites, with a similar sized car park. This information, obtained from the TRICS database, was presented in the TA that accompanied the Copsewood planning application, and was subsequently accepted by the Local Highway Authority (LHA). The agreed traffic generation for Butterfly World is presented in Table 1.

**Table 1 Butterfly World Peak Traffic Generation (as agreed with HCC through TA accompanying Planning Permission 5/2015/0722)**

	AM Peak Hour (0800-0900)			PM Peak Hour (1700-1800)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Vehicles	18	2	20	6	52	58

As such, in order for any future development to present a 'nil detriment' scenario for the local highway network, its traffic generation would need to be broadly similar to the figures presented in Table 1.

## Development Opportunities

As the 10.86Ha site has previously been used as a tourist attraction, it is considered as 'Previously Developed Land' by the Client and, as such, they consider that development should be permitted on it, despite its location with the Green Belt.

It is recognised, however, that the impact of any new development would still need to be carefully considered, to ensure no significant negative effect is caused to the Green Belt, or the surrounding highway and transportation networks.

As such, this note considers the potential to develop the site over four scenarios:

- Scenario 1 – Initial development on the site which **would generate no more traffic** than the number was accepted when Butterfly World was operating at its approved maximum capacity (i.e. 250,000 visitors per year);
- Scenario 2 – Further development on the site, limited to level where **there would be limited but no adverse impact on** the surrounding highway network;
- Scenario 3 – Development of the site's **previously developed land**, i.e. replacing all existing buildings, hardstanding, car parks etc with new development, but not developing the surrounding green spaces, equivalent to 6.18Ha;
- Scenario 4 – Maximum development, whereby **75% of all of the 10.86Ha site is developed**, i.e. 8.15Ha;

Within each of the scenarios, consideration is given to the trips generated by 'committed' development identified with the Council's draft Local Plan ('the Plan'). The Plan includes for significant housing growth in the area, including allocating land to the north of the site for residential uses. As such, it is important that any development proposal can be brought forward alongside these 'committed' sites.

Furthermore, it is known that the adjacent Mercure hotel have explored opportunities in the past to amend its access arrangements, for example limiting the existing access onto the roundabout to an 'in only', with vehicles exiting the site from a new access onto Miriam Lane. Such an arrangement could deliver a safer and more efficient operation of the Noke Roundabout, but its delivery would require Miriam Lane being reopened for traffic, and as such could be considered as part of a redevelopment of the site. It is, therefore, included as part of each of the four scenarios, above.

In order to identify the level traffic that the site could generate, the TRICS database has been interrogated for both the "Business Park" and "Mixed Private Affordable Housing" categories. As the final masterplan for the site has not yet been drawn up, these two categories offer the best assessment of a wide range of potential employment and residential uses, including all types of housing, offices, warehousing, hotels, commercial and retail units.

Should the site come forward as employment land, then the TRICS Business Park category offers flexibility between B1, B2 and B8 use classes, primarily focused on the 'higher' trip generating categories under B1 and B2. Of note, the TRICS Business Park category can provide the level of traffic generated, but only based upon the final 'Gross Floor Area' (GFA) of the employment buildings. As such, to convert the site's developable area (in hectares) to GFA requires a manual assessment of the information within TRICS. Likewise, the TRICS Mixed Private Affordable Housing category requires a similar exercise to convert site hectareage into dwelling nos., based on a manual assessment of dwellings per hectare.

In order to identify sites which are comparable to the likely use, only TRICS surveys which are based on a limited number of B8 uses (for the employment scenario), or have an affordable housing proportion of c.30% or less (for the residential scenario) have been considered within the calculations.

Based upon this assessment, it is considered robust to assume that every hectare of developable land could equate to 2,000sqm of floor area for employment use, or 30 dwellings.

## Scenario Testing

### Scenario 1 – Nil Detriment

Within this scenario, the key aim is for the site to generate no more traffic than the previous use. This 'maximum' has been agreed with the LHA as part of the Copsewood application as 20 two-way vehicle movements in the morning peak period, and 58 in the evening, as shown in Table 1.

As such, the amount of employment or residential development that the site can accommodate, prior to reaching these limits can be easily calculated, however the limit of development is set by which of the two peaks are considered as the most sensitive by the LHA.

If the site is being brought forward for employment purposes, the maximum level of development is in the region of 1,225sqm – 4,650sqm, depending on whether the AM or PM peak is considered most sensitive.

Similarly, should the site come forward for residential uses, the maximum level of development in the nil detriment scenario is between 40 and 125 dwellings.

For the purposes of this assessment and noting that no discussions have occurred with the LHA to date, it would be advisable to be cautious in the approach to these figures. As such a maximum development which would incur nil detriment to the local highway network should be considered as 1,225sqm of employment, or 40 dwellings.

## Scenario 2 – Development Limited by Highway Capacity

Within this scenario, the amount of development on the site is limited by the capacity of the existing highway network (i.e. no additional highway mitigation will be necessary to accommodate this level of development traffic).

To identify this limit, a number of data sources have been used. These include:

- The Copsewood TA – To provide information on the hotel's predicted traffic impact, but also the traffic flows and turning movements on the Noke Roundabout, with the hotel's committed roundabout improvements, for 2020;
- The Butterfly World TA – To provide information on the proposed Mercure hotel's traffic generation and distribution once the extension is complete and the new access to Miriam Lane installed;
- The Council's Draft Local Plan – To provide information on the level of 'future' housing development in the area, and the distribution of its traffic through the study area.

The study area has been limited to the A405 / Noke Lane junction and the A405 Noke Roundabout. These are considered the most sensitive to additional traffic movements, although the full scope of junction assessments would need to be agreed with the LHA as part of any subsequent planning application. The M25 junction has not been assessed at this time due to a lack of publicly available traffic data for it.

The Council's Draft Local Plan predicts a general 18% increase in traffic volumes throughout the District between 2018 and 2031, but it does not break this down into specific areas or routes. As such, the exact increase in traffic due to draft Local Plan allocations is difficult to derive without discussions with the LHA. The Plan does, however, cite a new link road between Radlett and Park Street (formally part of the Radlett Rail Freight Terminal, but now part of the proposed Park Street Garden Village), east of the Butterfly World site, which could reduce the amount of through traffic on the A405 by up to 1,000pcus (Passenger Car Units) in the AM peak and 300pcus in the PM. As the link road is not considered to be 'committed' at present, this reduction in traffic has not been included within the scenario tests.

In order to develop a baseline traffic scenario, the traffic flows and turning proportions within the approved the Copsewood TA have been used. This TA used traffic counts from 2009, growthed by 15% to get a 2020 scenario, with the hotel traffic included. A review of the Department for Transport traffic counters in the area show an actual increase of 12-14% within this time period, so the Copsewood scenario is considered robust.

The 'future year' assessment has been derived by applying a 'blanket' 18% increase in through traffic, in accordance with the Plan, and therefore can be considered a 2031 'end of plan period' scenario.

Combined together, this creates a very robust set of traffic flows and turning movements which simulate a 'worst case' assessment of junction performance.

Development-related traffic has been distributed according to the proportions set out in the Copsewood TA, which includes an assessment of Butterfly World, namely:

- A405 (south-west) 55%;



- A405 (north-east) 40%;
- B4630 Watford Road 5%.

Using this methodology, the capacity of both junctions has been assessed through the JUNCTIONS9 software programme and a scenario tested which mimics the 'nil detriment' scenario for both the Noke Lane priority junction and the Noke Roundabout.

The results of the assessment show that in the 'baseline' scenario, whereby all committed development traffic is included, but no development is added, the Noke Lane junction operates with a maximum delay on any turning movement of 18.16 seconds in the AM peak and 49.74 seconds in the PM peak. The Noke Roundabout, in the 'baseline' scenario, operates with a maximum delay on any arm of 19.95 minutes in the AM and 22.40 minutes in the PM.

Adding the 'nil detriment' development traffic to this 'baseline' traffic provides the scenario on which further development from the site should be assessed, as this is effectively the 'accepted' position, should Butterfly World still be open to the public. Adding this traffic increases the maximum delay at the Noke Lane junction to between 18.52 seconds and 19.86 seconds in the AM peak (+0.36 seconds and +1.7 seconds depending on whether employment or housing is brought forward on the site) and between 55.23 seconds and 61.79 seconds in the PM (+5.49 seconds and +12.05 seconds with the lower figure being for housing, in this peak period).

Similarly, the Noke Roundabout delays increase to 20.24 minutes and 20.08 minutes in the morning peak (+0.29 minutes and +0.13 minutes), for housing and employment, respectively. In the PM peak, this delay is limited to 23.04 minutes and 22.77 minutes (+0.64 minutes and +0.37 minutes), respectively.

In order to identify the limits of development by when the highway network begins to experience an unacceptable impact, it is considered that there should be no significant increase in the delays predicted in the 'nil detriment' scenario at the Noke Roundabout, as the most sensitive junction.

Using this methodology, the maximum residential development can be calculated as 75 residential dwellings (increase in maximum delay of +0.36 minutes +0.15 minutes in the AM and PM peaks, respectively), whilst employment uses could be up to 2,500sqm of GFA (+0.11 minutes and +0.33 minutes, respectively).

### Scenario 3 – Maximum Development on Previously Developed Area

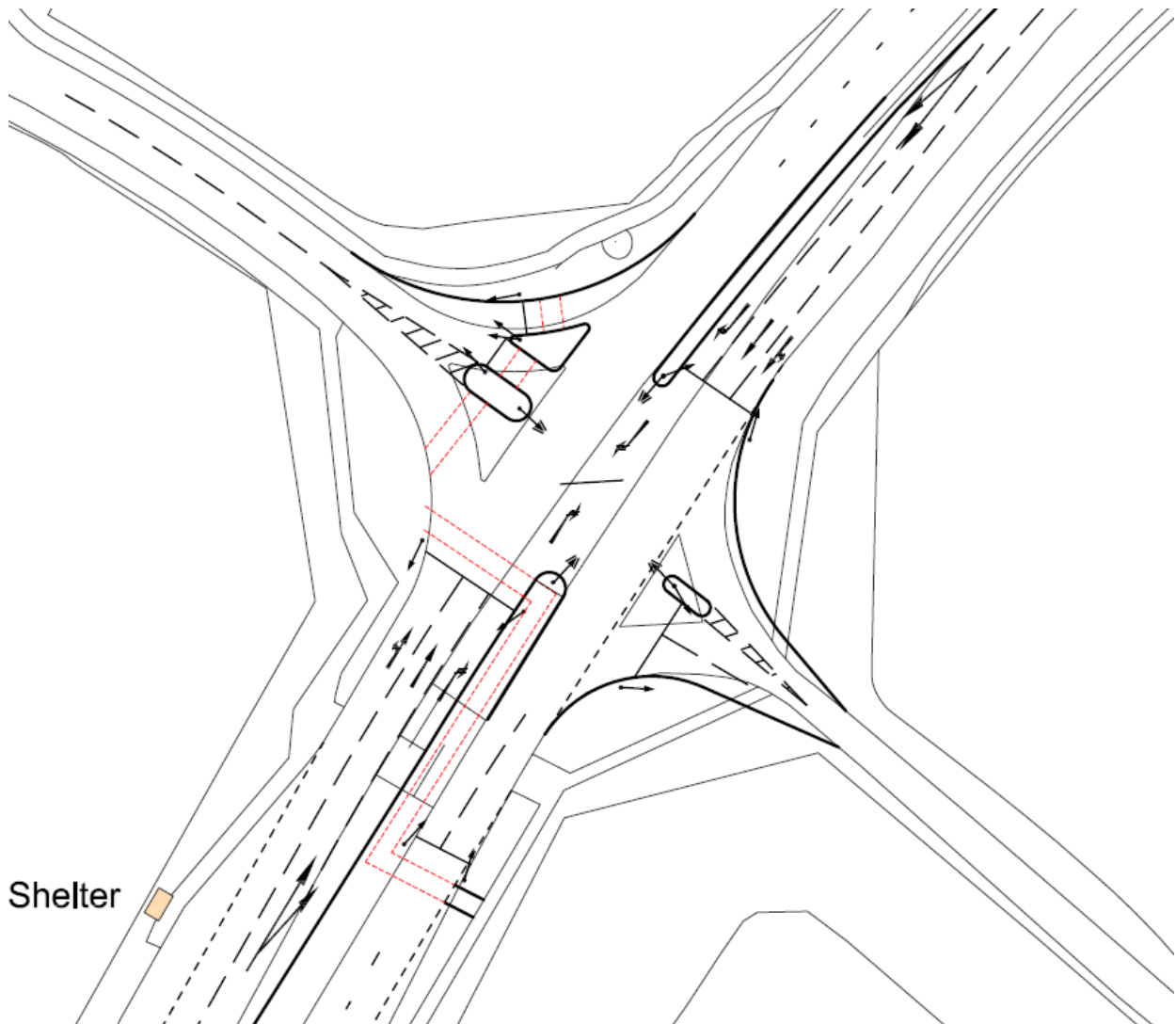
For this scenario, the maximum quantum of development is calculated by estimating the area of previously built upon land, i.e. 6.18Ha. Using this method, the total amount of development that the site could accommodate is:

- Employment = 12,360sqm GFA, or;
- Residential = 185 dwellings.

As both these levels are in excess of the limits derived in Scenario 2, above, it will be necessary to provide some improvements to the local highway network before the development could be fully realised.

One solution to this would be to signalise the Noke Lane junction and allow all traffic movements. This would have a positive effect on both the Noke Roundabout and the M25 J21A, by removing U-turning traffic from both. As such, both these key junctions are likely to see some improvement in operation. A proposal for the signalisation of the Noke Lane junction has been developed and is shown in Figure 5.

Figure 5 Noke Lane / Lye Lane Signalisation Proposal



The proposal allows all vehicle movements and accommodates pedestrian crossings of Noke Lane and the A405, south of the junction. These crossings facilitate access to the existing bus stops and are generally located on the desire lines for pedestrians from the development and also those using the existing bridleway network in the area.

Testing of this junction has been undertaken through the computer simulation software Linsig, and the results show that the revised signalised junction could accommodate up to 125 dwellings, or 4,650sqm of employment land. As these figures are lower than the total development potential for the previously developed areas of the site (at c.185 dwellings or c.12,360sqm of employment) it is considered that these lower figures are the maximum development quantum's that the site could deliver.

#### Scenario 4 – Maximum Total Development

For the final scenario, the maximum amount of developable area of 8.15Ha is in excess of the 6.18Ha considered in Scenario 3. As the traffic generated by Scenario 3 could not be accommodated within the highway network,

and lower limits have been identified, it is not considered necessary to consider this Maximum Development Scenario any further.

## Other Considerations

Whilst this note has focused on what could be delivered on the site in terms of highway capacity, other transportation-related matters will also need to be considered.

The site currently benefits from a bus stop and turning circle to allow a bus service to enter / leave the site along Miriam Lane. Due to the nature of the proposed development, it is unlikely that a commercial service will see this as an attractive proposition, even if the facility was maintained.

A 'through route' would be more attractive to potential operators, potentially using Miriam Lane and Chiswell Green Lane. This would minimise walk distances for employees / residents which would increase the likelihood of the development being acceptable to the LHA.

In order to achieve this, Chiswell Green Lane would need to be widened to c.5.5m from the existing end of the built up area, to a new site entrance, which would need to be wide enough to accommodate the necessary bus turning movements. This is likely to require a c.200m length of new road construction, although it is not clear whether there is sufficient highway land available to achieve this.

The Client should consider working with Hertfordshire Passenger Transport to develop a public transport solution for the site, which may include diverting an existing commercial service through the development, or working with the Copewood hotel scheme in expanding the 'shuttle bus' service they are committed to provide, to run through the Butterfly World development site.

A complimentary scheme would be to provide access to the existing bus stops on Watford Road by a new footway link, either along Chiswell Green Lane or through the adjacent agricultural land to Noke Side (or both), as shown in Figure 6. The Chiswell Green Lane link would be c.200m of new two-metre-wide footway construction alongside the existing carriageway, whilst the Noke Side link would be c.150m of a similar construction across the field. Lighting would need to be provided along both routes.

Figure 6 Other Links to Existing Transportation Network



### Summary

This note has assessed various different scenarios and methodologies for identifying the maximum level of development that could be accommodated on the former Butterfly World site. In summary, the limits are set by what approach the Client is willing to take, as shown in Table 2.

**Table 2 Summary of Development Limits**

Scenario	Potential Maximum Development*		Notes
	Employment	Residential	
1 – Nil Detriment to the Local Road Network	1,225sqm	40 dwellings	No mitigation necessary
2 – Maximising Development withing the Existing Network Capacity	2,500sqm	75 dwellings	No mitigation necessary
3 – Developing Only Land Which has been Previously Developed	4,650sqm	125 dwellings	Noke Lane Signalised
4 – Maximising Development on the Land	4,650sqm	125 dwellings	Noke Lane Signalised

\*Note that this is the maximum of one development type or the other. No test has been undertaken with a combination of uses.

It should also be noted that there may be other highway improvement works to other junctions required as part of any future development on the site. This would need to be scoped with the LHA as part of any planning submission.

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



**ST ALBANS CITY AND DISTRICT COUNCIL**

**SUBMISSION TO CALL FOR SITES CONSULTATION**

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

**March 2021**

## **1.0 Introduction**

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

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

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

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

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

## **2.0 Conclusion**

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

## Former Radlett Aerodrome, Radlett

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

Former Radlett Aerodrome

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

Freehold

**Area of site** (hectares)

Approximately 119ha

**Current use(s)**

Former Airfield/mineral extraction and restoration site.

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

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

n/a

**b. Awaiting relocation of current use**

n/a

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

n/a

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

5+ years

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

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

n/a

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

Part of the site in the west lies within the Conservation Area of the Park Street Frogmore Character Area.  
Article 4 Direction

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

Close proximity to Historic Parks

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

Green Belt, Landscape Development Area

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

Any potential constraints could be mitigated through design and development management.

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

This site has an implemented planning permission for a Strategic Rail Freight Interchange (SFRI).

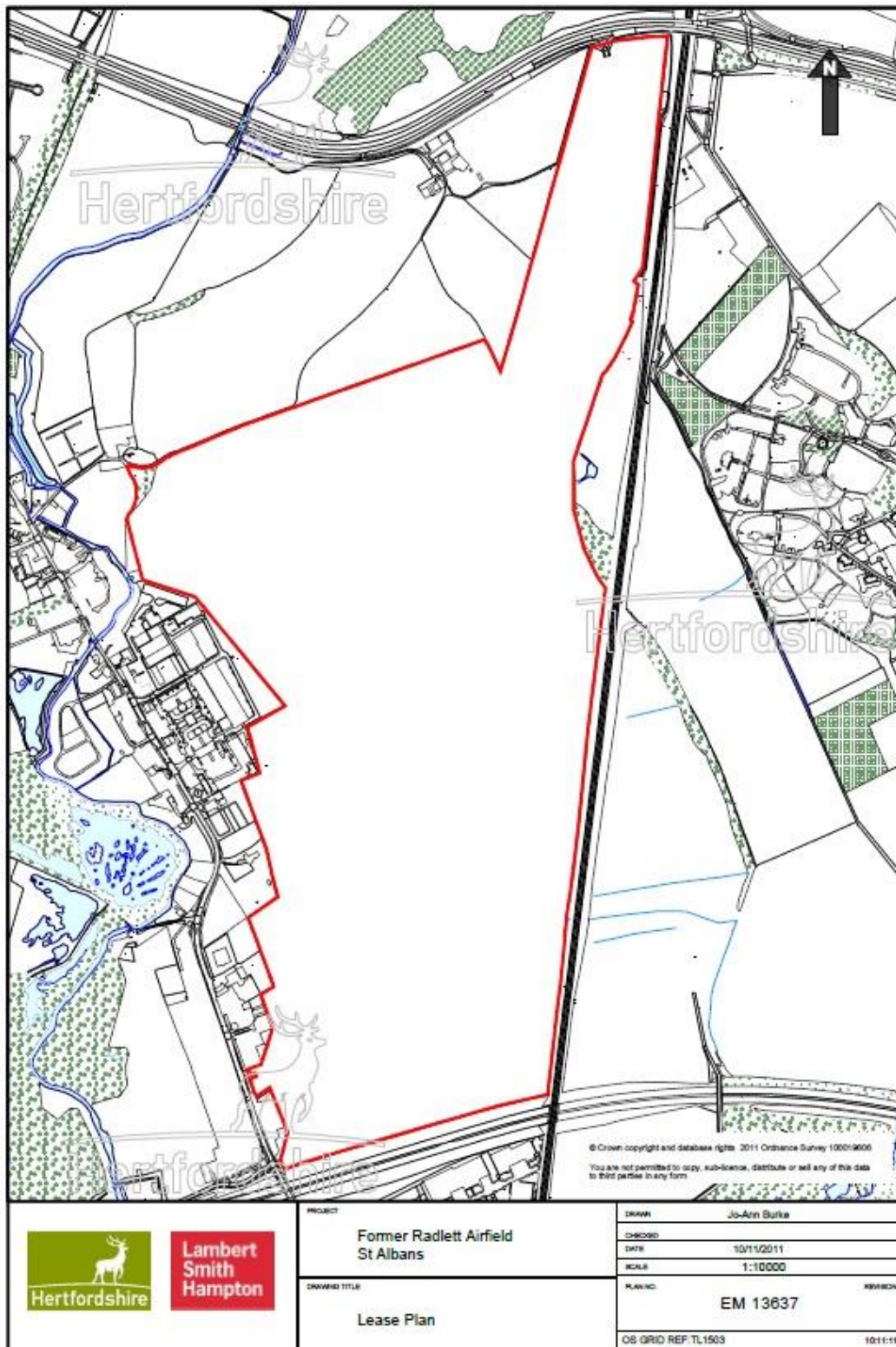
**Sketch scheme** (submitted for information if necessary)

No



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

This site has an implemented planning permission for a Strategic Rail Freight Interchange (SFRI).



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

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

**By online consultation portal:**

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

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

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

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

<b>Your Details</b>	
Name	██████████
Company/Organisation	Greenwood URC
Address	Watford Road
Postcode	AL2 3HG
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input checked="" type="checkbox"/> Other - (Agent)

<b>Site Details</b>			
<b>Requirements:</b>			
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>			
Site address/location (Please provide a map showing the site boundary)	Greenwood United Reformed Church Watford Road, Chiswell Green, St Albans, Herts AL2 3HG		
Site area (in hectares)	Approx. 0.42ha		
Coordinates	<b>Easting</b>	-0.356665	<b>Northing</b> 51.730980
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)	URC THAMES NORTH TRUST (Company Registration Number 00075432) St. Paul's Bayswater, Newton Road, Bayswater, London W2 5LS		
Current land use	D1 Non-residential institution Place of worship and church hall		
Condition of current use (e.g. vacant, derelict)	Active (subject to Covid 19 restrictions)		
Suggested land use	<input type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input checked="" type="checkbox"/> Mixed Use (Church and community facilities with housing) <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	Existing buildings in poor condition. Local demand for modern flexible community space and smaller housing units, supported by neighbourhood plan. Significant increase in D1 here could be funded by including some small scale residential development on this site and on sister site in Bricket Wood.		
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Some minor covenants that will not affect proposals.
	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	
	Please include details of the above choice below (for example planning reference numbers and site history)  Informal pre-application advice received in 2019.	
Other comments	We note that SADC are seeking sites that present opportunities for tree planting and biodiversity improvements, sites that could generate renewable and low carbon energy and heat, and sites that will create employment. Our proposals for this site include all of these in addition to the worship space, community facilities and housing referred to above.	



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

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

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

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

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

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

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

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

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

**Please do not submit sites that:**

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

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

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

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

**By online consultation portal:**

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

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

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

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

<b>Your Details</b>	
Name	████████████████████
Company/Organisation	Woolf Bond Planning
Address	The Mitfords, Basingstoke Road, Three Mile Cross, Reading
Postcode	RG7 1AT
Telephone	0118 988 4923
Email	████████████████████ <a href="mailto:office@woolfbond.co.uk">office@woolfbond.co.uk</a>
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

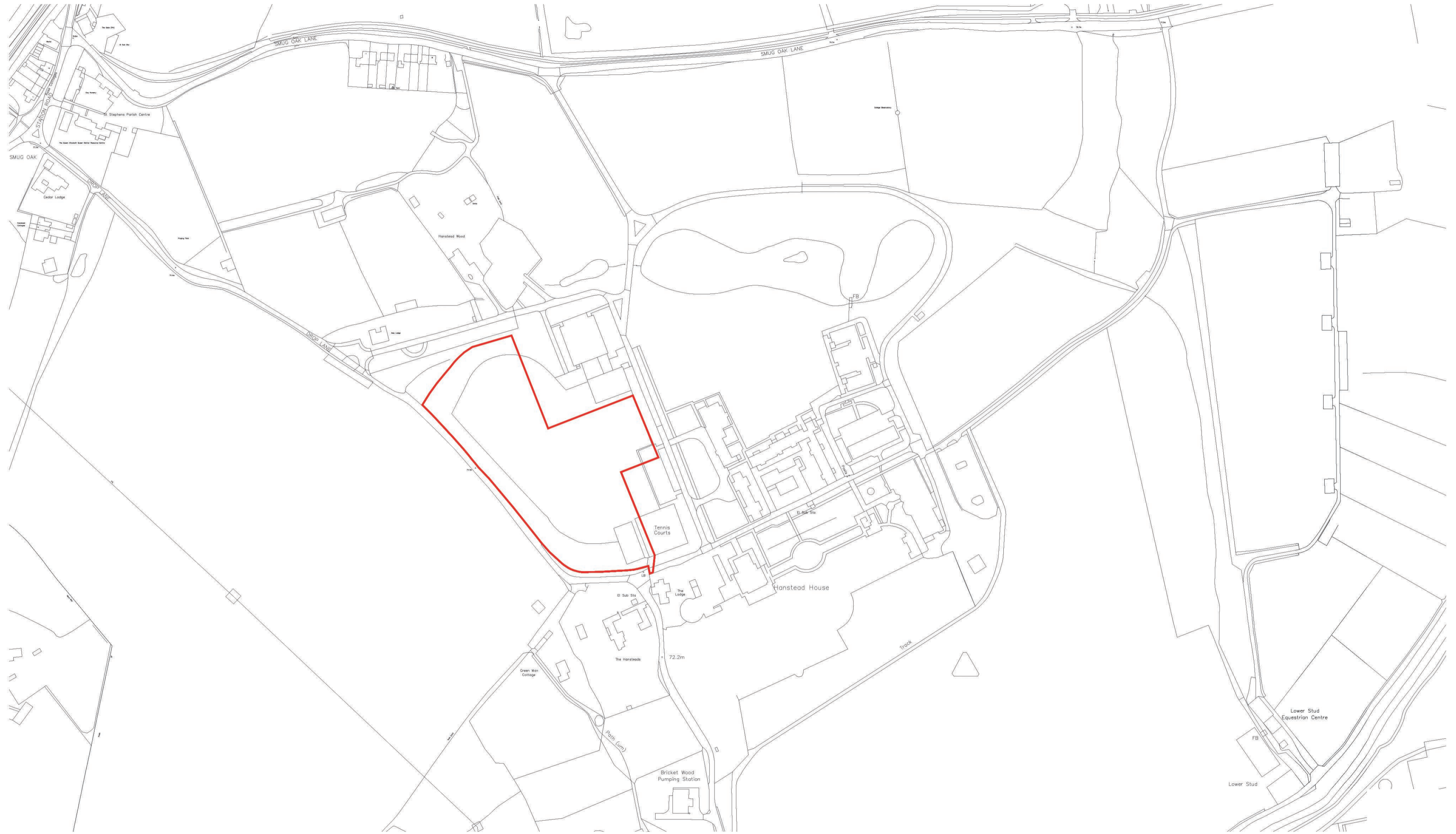
<b>Site Details</b>			
<b>Requirements:</b>			
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>			
Site address/location (Please provide a map showing the site boundary)	Land at former HSBC Training Centre, Smug Oak Lane, Bricket Wood, St Albans		
Site area (in hectares)	Approximately 2.3ha		
Coordinates	<b>Easting</b>	514026	<b>Northing</b> 201807
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)	Anticipated developer is Linden Wates (Bricket Wood) Ltd., Eastwood House, Glebe Road, Chelmsford, Essex, CM1 1RS  Owner is St Congar		
Current land use	Parcel of previously developed land as confirmed by the Secretary of State. Informal open space as part of implemented RM permission for 129 dwellings (LPA Ref. 5/18/2118).		
Condition of current use (e.g. vacant, derelict)	Informal open space as part of implemented RM permission for 129 dwellings (LPA Ref. 5/18/2118).		
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)		



Reasons for suggested development / land use	<p>Site forms part of the wider former HSBC Training Centre which the Secretary of State confirmed (at appeal on application 5/2014/3250) was wholly previously developed land (paragraph 8). It would form a logical addition to the area with implemented reserved matters consent granted under LPA Ref. 5/18/2118.</p> <p>The site is considered to have potential for circa 46 dwellings (subject to detailed masterplanning in due course).</p>
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Site wide TPO but not envisaged to form a constraint.
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Topography affecting site (land levels, slopes, ground conditions)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable). Site can be accessed from the implemented redevelopment of the central part of the former HSBC Training Centre.

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input checked="" type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other	
Other comments	<p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p>As referenced above, the whole site was confirmed as previously developed by the Secretary of State in the appeal approved under application 5/2014/3250 (paragraph 8). It offers the potential for additional residential development consistent with the prevailing density and form of the adjacent development.</p>	



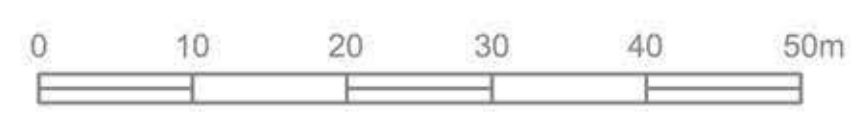
Scale: 1:2500 @ A2  
Job No: 1431 / OLS / 203  
Date: November 2019

# Hanstead Park, Smug Oak Lane, Bricket Wood, St Albans

## Location Plan



CMYK (Planning & Design) Ltd  
6 The Gavel Centre, Porters Wood  
St Albans, Hertfordshire AL3 6PQ  
t:01727 830123 e:email@cmykuk.net  
w:www.cmykuk.net



Scale: 1:500 @ A0  
 Job No: 1431 / OLS / 202  
 Date: October 2019

**Hanstead Park, Smug Oak Lane,  
 Bricket Wood, St Albans**



CMYK (Planning & Design) Ltd  
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 www.cmymk.net