



St Albans Draft Local Plan 2020 - 2038

Burston Park

St Albans Call for Sites response 2021

Planning Report on behalf of landowners at Burston Park

DLA Ref: 20/200

March 2021

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0.0 EXECUTIVE SUMMARY

0.1 This proposal represents a comprehensive and sustainable masterplan vision for the land at Burston Nurseries.

0.2 The proposals include:

- Retention and expansion of the existing garden centre creating enhanced retail facilities
- Housing, including 40% affordable housing
- 60-bed care home
- Employment space, including small, flexible, office units for local SMEs and start-ups. Work space for those working remotely and supporting working away from the office.
- Hotel (as already consented) with gym, studio and pool available for local residents
- New public open space including woodland planting and community allotments
- New and upgraded walking, cycling and horse-riding connections across the site creating new links between existing footpaths and bridleways
- Pedestrian safety improvements in Lye Lane
- Excellent bus and train links with easy access to St Albans town centre and Watford Junction Station
- Potential for around 100 local jobs (additional to the employment at the hotel of some 85 full and part time roles)

0.3 The site is largely previously developed and makes little contribution to Green Belt purposes.

0.4 The proposed walking, cycling and horse-riding links will substantially enhance sustainable travel modes and leisure activity in the area.

1.0 INTRODUCTION

1.1 This report has been produced to support a Call for Sites submission for land at Burston Nurseries, St Albans. The report was commissioned by the owners of the three parcels of land who are working together to deliver a comprehensive masterplan which meets a variety of development needs and provides substantial community benefits.

1.2 The site, entitled Burston Park, is being promoted as a new mixed-use neighbourhood including the following uses:

- Retention and expansion of the existing garden centre
- Housing, including 40% affordable housing, adult social care facility and 60-bed care home
- Employment space, including small, flexible, office units and retail and service facilities
- A hotel (as already consented)
- New public open space, including woodland planting and allotments.
- New and upgraded walking, cycling and horse-riding connections across the site

1.3 The site is largely made up of previously developed land including the retail garden centre, an aquatics centre, B8 Storage and individual dwellings, together with an implemented 150-bed

hotel consent. As such, removal of the site would have very limited impact on the Green Belt, as recognised in the Council's previous Green Belt review. In addition, as a well-located and previously developed site in the Green Belt, the site should receive "first consideration" ahead of undeveloped sites in the Green Belt.

1.4 From a practical perspective, the site has very few adjoining properties. With the exception of a handful of properties on the Spielplatz development, there are no neighbours likely to be directly affected. The site is not visible from public viewpoints and even the public footpath (FP18) that runs through the site does not afford significant views into the site because of boundary screening and vegetation.

1.5 A key benefit of the comprehensive nature of the development is the provision of new and upgraded links for pedestrians, cyclists and horse riders. The site is not currently accessible but new links around the edge of and through the development provide access between How Wood, Chiswell Green and routes to the south on safe, off-road routes which will be attractive to users. These new and upgraded links are supported by the relevant Rights of Way user groups and the highway authority. Not only is this of significant recreational benefit but it also contributes to achieving policy objectives set out in the Local

Transport Plan (LTP4) aimed at promoting sustainable forms of transport.

assessments. It should be allocated for mixed-use development in the emerging Local Plan.

- 1.6 The mixed-use nature of the site reduces the need to travel and key facilities (schools, shops etc) are available within walking distance of the site. Access to bus and rail services, including How Wood railway station and Bricket Wood railway stations (1,000m from the site and providing access to the city centre in 10 minutes), means that residents will have a genuine choice about travel modes. A shuttle bus service is already planned to run between the hotel and key locations in the city centre and expanding this service to serve the proposed development would only add to its viability.
- 1.7 The proposal also facilitates and is consistent with the development proposed by Castleoak in the form of a Care and Assisted Living Village. A planning application has been submitted to the Council by Castleoak and, at the time of writing, has not yet been determined. The Castleoak proposal is included on the illustrative masterplan for the Burston Park site and, as can be seen, the two proposals sit comfortably alongside each other with a mutually beneficial relationship between the two.
- 1.8 There are no constraints that would prevent development and the majority of the site has been supported in previous Council

2.0 SITE & CONTEXT ANALYSIS

2.1.0 Location

The Site is located south of Chiswell Green. It is situated on the southern side of the North Orbital Road (A405) and is approximately 1.6km to the north-west of the M1 and M25 crossover. St Albans City Centre is some 3.7km to the north.



Figure 1: Location of the Report Site

2.2.0 Context & Land Uses

The site is some 20.3 ha in size and consists of five main elements:

- **Burston Garden Centre and Hertfordshire Fisheries**
The garden centre and aquatics centre are situated to the north of the site and fronts the A405 (North Orbital). These commercial uses occupy a large proportion of the site, comprising two shops to the front and extensive tarmac and hardstanding for customer parking, with a series of large single-storey glasshouses, structures and “industrial buildings” that extend significantly to the south/south-west of the site.
- **Open field**
At the southernmost part of the site is a largely undeveloped, open field situated outside the operations of Burston Garden Centre. This parcel of land is essentially rectangular and is bound by Burstons to the north and west, Birch Wood to the east and Spielplatz to the south. A small area to the south-west is currently used as a builder’s yard for heavy machinery and vehicles.

- **The Hawthorns & Wexhams**

These are two large, detached dwellings set within extensive plots and are accessed directly from Lye Lane. Both properties are owned by two of the three landowners promoting the site.

- **The Limes and Burston Manor Farm Buildings**

The Limes is a large, detached dwelling currently in residential use. Burston Manor Farm Buildings are in commercial storage use. The Site also benefits from planning permission for the conversion of buildings into a large detached dwelling house.

- **Copsewood, Cleveland and The Orchard**

This parcel of land is located to the north-west of the site. It is bound by Lye Lane to the west and the North Orbital Road (A405) to the north. Burston Garden Centre is situated to the east on higher ground and which is separated from this parcel by a public footpath (St Stephens 018), linking Lye Lane and A405. The site previously contained two detached dwellings, known as Copewood and Cleveland, although the dwelling at Copewood has now been demolished through the implementation of the hotel consent. The area to the east is a former orchard although many of these trees can no longer be harvested. This parcel of land is the location

for the approved and implemented 150-bed hotel complex (LPA Ref: 5/2015/0722 and 5/2013/3450), as set out in Section 4 (Planning History) below.

2.2.1 Whilst the site is wholly within the Green Belt, it exhibits strong urban fringe characteristics that are visually noticeable from an aerial perspective and once at ground level. This stems from the site's scale of existing commercial development and hardstanding and its proximity to existing settlements of How Wood, Chiswell Green and pockets of residential development that lie within the site and to the south off Lye Lane, The Laurels and Spielplatz.

2.2.2 From wider views, the majority of the site is contained by large areas of mature woodlands and vegetation along its boundaries, particularly on its western/southern flanks that abut Birch Wood and How Wood County Wildlife Sites. Release of the site from the Green Belt will allow extensive landscaping and woodland planting to improve and consolidate the existing boundaries, while existing hedgerows alongside Lye Lane and the A405 will be retained and strengthened.

2.3.0 **Access**

Access into the site is achieved from the North Orbital Road (A405) which currently serves Burston Nurseries, including a

separate access for Burston Manor and other buildings located within the site. A direct access from the site exists to How Wood. The residential property known as Cleveland has its own access from the A405 and there are also five existing accesses to the remainder of the site from Lye Lane. The approved and implemented hotel consent involves an access from the Noke Lane roundabout.

2.4.0 **Development Plan Notation**

The proposals map of the St Albans District Local Plan Review 1994 shows the Site within the Metropolitan Green Belt (MGB) and a Landscape Conservation Area, adjacent to the defined urban area of Chiswell Green and How Wood. Birch Wood and How Wood are both registered Country Wildlife Sites.

2.4.1 There is a Grade II* listed building known as Burston Manor and a Grade II listed building outside of the site, albeit both buildings are well-contained by high hedges and mature trees. The north/north-eastern section is also a designated archaeological site that could be subject to recording conditions of the Medieval Manor and Deserted Village (AS.R.32).

2.4.2 The Environment Agency Flood Map illustrates that the site is within Flood Zone 1 and therefore is at low risk of flooding. As expected with a large site there some small pockets of land within

the site that are mapped as having a higher risk from surface water flooding, however this is not considered to be preclude development and could be managed through a SuDS Strategy. Areas identified as higher risk are not in areas of proposed development.

2.5.0 **Local services**

The nearest shops to the site are located at How Wood, around 1,000m from the site and accessible on foot. There are also primary schools at How Wood and Killigrew JMI, 1,300m and 2,000m from the site respectively.

2.5.1 The site is approximately 1km from the centre of Chiswell Green, which hosts a range of local services including a coop food store, a post office, various other smaller retailers, public houses, a nursery and primary school and multiple community facilities. In addition, there is a convenience store forming part of the petrol filling station at the A405/B4360 roundabout junction within 50m of the Site.

2.5.1 St Albans is also in very close vicinity to the site and offers a broader range of services including large employment areas, two train stations, large retailers and various schools ranging from nursery to secondary school level.

Facility	Local Provision	Proximity to site (km)	Walk time (mins)	Cycle time (mins)
Education	How Wood Primary and Nursery School	1.3	16	6
	Killigrew Primary and Nursery School	2.0	24	8
	St Michael's High School	3.1	-	11
Retail	Little Waitrose	0.1	2	1
	Watford Road Post Office	1.0	13	4
	Co-op How Wood	1.0	12	6
Health	How Wood Pharmacy	1.0	12	6
	Park Street Surgery	1.2	15	6
Faith	Park Street Baptist Church	1.4	17	5
Leisure	Burston Garden Centre	0	0	0
	Greenwood Park	1.0	12	5



Figure 2: Site Context and Land Uses

3.0 STRATEGIC CONTEXT

3.1.0 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.

3.1.1 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

3.2.0 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 – ranked 266th out of the 298 local authorities in England.

3.2.1 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.

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

3.3.0 **The portfolio of housing sites**

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

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

3.4.0 **Green Belt considerations**

The Council's Green Belt review from 2013 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 2013 Review must be developed into a more sophisticated and nuanced review of development potential. This will include both strategic and smaller-scale housing and employment sites.

3.5.0 **Previously Developed Land**

Government policy in the NPPF includes a positive framework for the redevelopment 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."

3.5.1 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.

3.5.2 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.

3.6.0 **Provision of Commercial Floorspace**

There has been a loss of around 60,000 sqm of office space in St Albans since 2008, primarily resulting from the introduction of Permitted Development Rights (PDR). This loss is the highest figure in the South West Herts area. The South West Herts Economic Study Update (2019) also found that there has been a significant loss of employment space across Hertfordshire. It is said that the functional economic market area has experienced a total net loss of around 223,000 sqm, equating to approximately a fifth of south west Herts' office space being lost since 2008.

3.6.1 The supply of office space is now at very low levels such that there is now a serious divergence between supply and demand in the market, particularly in St Albans and Hertsmere. This is creating significant barriers to growth and investment i.e. being able to attract and retain business. There is anecdotal evidence to suggest that local firms are having to relocate out of the district due to a lack of suitable premises in St Albans. The South West Herts Economic Study has shown that 90% of deals for office space in St Albans have been for smaller floorplates under 500 sqm, highlighting the appeal of this district for SME businesses within the professional service and the creative and digital sector.

3.6.2 Many SMEs choice in location comes down to the cost of floorspace, flexible workspace, accessibility and access to amenities.

3.6.3 It is anticipated that a shift in future working patterns will give employees the ability to work closer to home and there is therefore a need for appropriate high quality and flexible office facilities to support new working patterns in the district.

3.6.4 It is clear that additional office space is needed simply to offset some of the recent losses and help to control rent levels. This is aside from any additional land needed to support population and housing growth over the Local Plan period to 2038. Population growth of around 20,000 people is being planned for through the Local Plan. Population growth on this scale needs to be supported by equivalent job creation.

4.0 PLANNING HISTORY

4.1.0 Site

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

LPA Reference	Proposal	Decision
5/2020/3022	Demolition of all existing buildings, structures and hardstanding and redevelopment of the site to provide a new retirement community comprising 80 assisted living apartments with community facilities and 44 bungalows together with associated access, bridleway extension, landscaping, amenity space, car parking and associated and ancillary works	Ongoing
5/2019/2429	Demolition of all existing structures and redevelopment of the site to provide a new retirement community comprising a 62 bedroom care home, 122 assisted living bungalows and apartments, a community clubhouse together with associated access and alterations to pedestrian/bridleway, landscaping, amenity space and car parking (resubmission following refusal of 5/2018/1324)	Refused to determine – 15/10/2019

5/2018/1324	Demolition of all existing horticultural structures and redevelopment of the site to provide a new retirement community comprising a 64 bedroom care home, 125 assisted living bungalows and apartments, a community clubhouse together with associated access and pedestrian/bridleway improvements, landscaping, amenity space and car parking.	Appeal Dismissed – 09/01/2020
5/2015/0722	Hotel with 150 bedrooms, conference and function centre, associated car parking, realignment of roundabout and retention of bungalow (amendments to 5/2012/2055 dated 27/09/2013 and 5/2013/3450 dated 21/03/2014)	Approved – 22/08/2016
5/2014/3049	Improvement to site access and introduction of new signal controls	Approved – 03/07/2015
5/2013/3450	Submission of Reserved Matters (appearance) following outline planning permission 5/2012/2055 dated 27/09/2013 for hotel with 150 bedrooms, conference and function centre, associated car parking and realignment of roundabout	Approved – 21/03/2014
5/2012/2055	Outline application (access, landscaping, layout and scale) for hotel with 150 bedrooms, conference and function centre, associated car parking and realignment of roundabout (resubmission following refusal of 5/2011/2896)	Approved – 27/09/2013

5/2011/2896	Outline application (access, appearance, layout and scale) for hotel with 150 bedrooms, conference centre, separate staff hostel, associated car parking and realignment of roundabout (resubmission following refusal of 5/2010/2668)	Refused – 08/03/2012
5/2010/2668	Outline Planning Permission - Hotel campus comprising of two hotels with total of 270 rooms, conference centre, separate staff accommodation, associated car parking and realignment of roundabout (resubmission following withdrawal of 5/09/2463)	Refused – 13/04/2011
	Outline Planning Permission - Hotel campus comprising of two hotels with total of 270 rooms, conference centre, separate staff accommodation and associated car parking, mini park-and-ride facility (combined total of 573 parking spaces) and realignment of roundabout	Withdrawn – 19/03/2010

5.0 PREVIOUS SHLAA ASSESSMENT

- 5.1.0 Burston Garden Centre was submitted independently through previous Call for Sites invitations and was assessed by the Council in the 2016 Strategic Housing Land Availability Assessment (SHLAA). The Officer's findings found that the site should be given further consideration (in part) for housing development.
- 5.1.1 In Green Belt terms, the Council concluded that any future development would be visually intrusive and would result in encroachment into the surrounding countryside, as well as coalescence between Bricket Wood and Chiswell Green. It was also considered to result in unrestricted sprawl in a "*vulnerable gap between existing settlements*". Nevertheless, the officer's conclusion goes on to say that site comprises previously developed land such that there may be scope for residential development to the north where the existing structures are sited.
- 5.1.2 These conclusions appear to be more critical than the Council's SKM Green Belt Review (November 2013) wherein the site – as part of Parcel 26 – was not considered to be as important in its contribution to Green Belt purposes. In addition, when compared to all other assessed parcels within the District, it is arguably one of the least strategically important parcels and therefore ought to be deemed as one of the more suitable locations for Green

Belt release. Section 8 (Green Belt Considerations) of the report sets out in greater detail the Parcel's performance against each purpose of the Green Belt.

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

No significant environmental constraints other than the site is located within the Green Belt.

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 essentially level such that large amounts of spoil would not need to be removed.

6.6.0 Utility services

Due to the existing commercial and residential uses, the site benefits from all main services.

6.7.0 Legal issues

The three landowners are collaborating on a joint submission and have engaged consultants to explore development potential. There is no third-party land involved.

6.8.0 Access

Access into the site is currently achieved from the North Orbital Road (A405) which currently serves Burton Nurseries, including a separate access for Burston Manor and other buildings located within the site. A direct access from the site exists to How Wood. The approved and now implemented consent for the hotel involved an access direct from the Noke Lane roundabout and this, along with the Burstons access, will form the main access for development.

6.8.1 The residential property known as Cleveland has its own access from the A405 and there are also five existing accesses to the remainder of the site from Lye Lane. The implemented hotel consent involves realignment and new access off the A405 roundabout.

6.9.0 Other constraints

- Site includes AS.R.32 (Medieval Manor and Deserted Village, Burston Manor), an archaeological site which may be subject to a recording condition.
- Site abuts two County Wildlife Sites (76/020 – Birch Wood and 76/021 – How Wood)
- Two listed buildings adjoin the site albeit any future development would provide a soft, landscape buffer to protect their setting.

7.0 NEIGHBOURHOOD PLAN PROPOSALS

7.1.0 Burston Garden Centre was submitted for consideration through the St Stephen Neighbourhood Plan in 2017. The St Stephen Neighbourhood Plan group commissioned consultants, AECOM, to assess the sites put forward around the parish and to recommend which, if any, should feature in future a Neighbourhood Plan. AECOM's report dated 5 December 2017 summarises the findings.

7.1.1 In respect of the report site, known as site S20, AECOM concluded:

"It could become achievable either after due consideration through the LDF process, given that the site is considered as in some parts previously developed land the site's location in the Green Belt, on the edge of the specified settlement of How Wood, or possibly from an ad hoc application, based upon some limited potential for replacing all or most of the existing uses in the northern part of the site with residential development.

Limited residential development broadly along the lines envisaged above and below is believed to be supported by the landowner, as well as the original proposal for complete redevelopment of the entire site.

This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.

However Policy DLP 12 of the Draft Strategic Local Plan 2011 - 2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a neighbourhood planning site allocation would be 30. This site is over this threshold and therefore would not be supported by SADC."

7.1.2 A Pre-Submission (Regulation 14) version of the draft Neighbourhood Plan was published for consultation in October 2020. This document included Policy 28 which allocated the report site for a retirement village. The wording of the draft policy is set out in Figure 3.

7.1.3 The Pre-submission Neighbourhood Plan was developed in parallel with the Local Plan and the publication of the Regulation 14 Neighbourhood Plan coincided with the withdrawal of the Local Plan. On this basis, the Neighbourhood Plan group felt they could no longer include potential Green Belt releases as the strategic framework that would have been provided by the Local Plan no longer existed and the Neighbourhood Plan was at risk of not being consistent with Government policy if it proposed Green Belt allocations.

POLICY S20: BURSTON NURSERIES

1. Land at Burston Nurseries (circa 3.8 ha) is included for a 'C2 Use Class' retirement village to provide a range and choice of housing for older people and which should cater for the varying dependency levels of the care and support that older people need.
2. The site has capacity for approximately 200 units of accommodation, which should be supported by sufficient parking and landscaping.
3. The retirement village will provide a range of services and facilities that encourage residents to maintain independence, support their health and wellbeing and reduce loneliness and isolation. Examples could include domiciliary care provision, therapy rooms, restaurant, wellbeing suite, resident lounges and ancillary staff accommodation.
4. Improvements to signalise the existing junction (to include for a signalised pedestrian crossing point) with the A405 are approved to support the allocation. The provision of new and enhanced public footpaths/bridleways that enhance access to the countryside will also be supported.
5. Development proposals should consider the historic environment, including the setting of the Listed Burston Manor, carefully, and any planning application should be supported by a Heritage Statement that assesses the potential impacts on the historic built environment in accordance with relevant national planning policy.

Figure 3: St Stephen Neighbourhood Plan extract, October 2020 draft

7.1.4 The version of the Neighbourhood Plan that has been submitted to St Albans City and District Council therefore contains no proposed housing sites.

7.1.5 However, the “technicality” that prevents the Neighbourhood Plan from allocating Green Belt sites should not detract from the fact that the Neighbourhood Plan group supported development

of the report site. Furthermore, the consultation feedback on the pre-submission Neighbourhood Plan was also positive where 73% of the residents' feedback for this site was positive and a further 16% was neither positive nor negative. Only 11% of respondents disagreed or strongly disagreed with the provisions of draft Policy 20. This level of public support for a greenfield development site is extremely rare.

7.1.6 In addition, the proposed amendment to the built-up area of St Stephen illustrated that the whole Burston Garden Centre would be removed from the Green Belt, which comprises at least 50% of the submitted site. This should be a material consideration for the Council when determining sites that are most appropriate for Green Belt release.

7.1.7 Were it not for the withdrawal of the draft Local Plan, this site would be proposed for allocation in the Neighbourhood Plan and would be partly removed from the Green Belt.

8.0 THE MASTERPLAN

8.1 A series of plans have been produced by Wakelin Associates Architects, including:

- Site location plan
- Opportunities and constraints plan
- Indicative masterplan – access
- Indicative masterplan – land use

8.2 An indicative masterplan has been produced to illustrate the mix of uses, the broad structure of development and the main routes into and through the site.

8.3 A key feature of the site is the mix of uses proposed and the potential this provides to create a sustainable neighbourhood within the site. Residents living in the proposed dwellings on the site will have access to retail facilities at the retained and expanded garden centre, employment opportunities including space for remote working, a swimming pool, gym and restaurant within the hotel complex and plentiful on-site open space including allotments. Not only will these facilities be available to residents on the site itself but also to nearby residents, who will see their accessibility to services improve. In addition to the facilities on site, nearby facilities are also available within walking

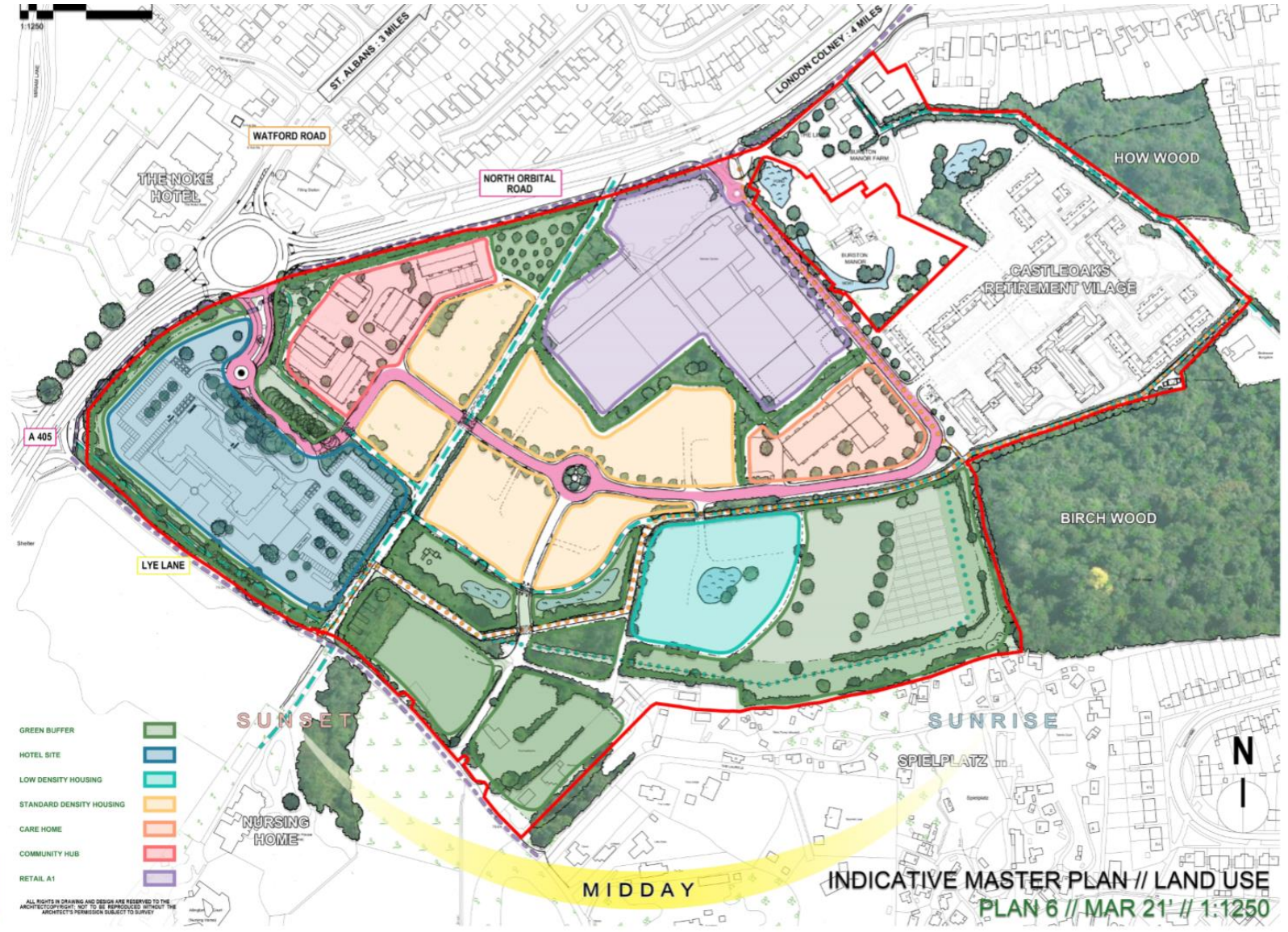
distance. This mix of uses is entirely consistent with the thrust of local transport policy that favours walking and cycling over use of the private car.

8.4 The green edges to the site are also a defining feature of the development, with existing features retained and strengthened and new landscape planting, particularly along the southern boundary.

8.5 Access to the site is provided by the already-approved arm on the Noke Lane roundabout and the improved junction serving Burstons Garden Centre. The main road running through the site will be of sufficient width to enable buses to be diverted through the site.

8.6 The network of walking, cycling and horse-riding routes around and through the site not only result in a permeable development but provide enhanced connectivity and safer routes for local residents.

W BURSTON NURSERIES ST ALBAN



9.0 GREEN BELT IMPACT

9.1.0 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, which has been partially informed by the Council's SKM Green Belt Review Purposes Assessment (November 2013) of Parcel 26, as shown in Figure 3 below.

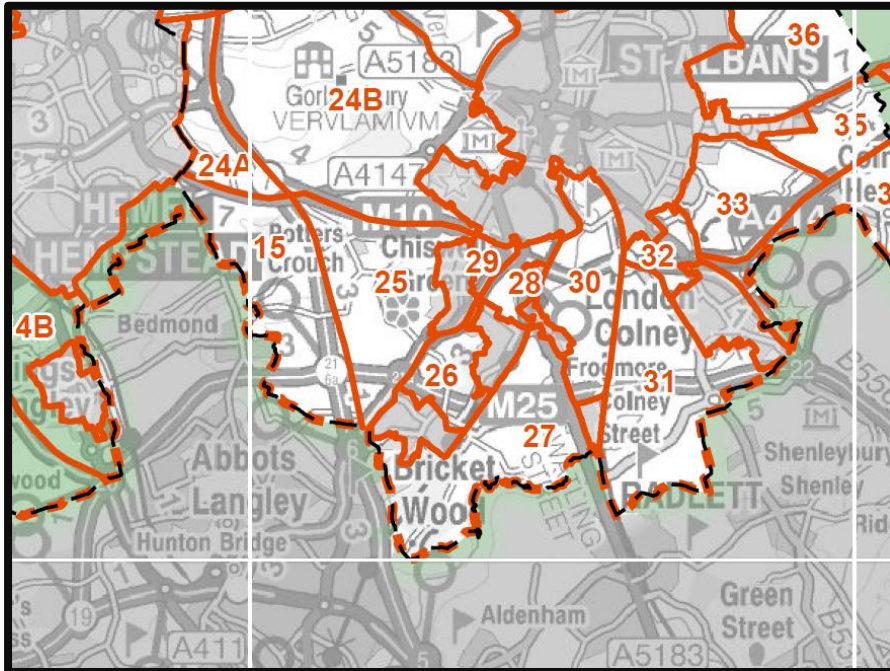


Figure 4: Caption from the Council's SKM Green Belt Review (November 2013)

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

The site is located away from large built-up areas of London, Luton and Dunstable and Stevenage. The Green Belt Review concludes that it does not form a connection with a wider network of parcels to restrict sprawl and therefore makes limited or no contribution to this purpose.

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

The site is located within the strategic gap that separates the main settlements of St Albans and Watford (Abbots Langley) by some 4.8km; Chiswell Green, How Wood, Park Street and Radlett Road are all smaller settlements/villages situated within this gap. The review states that any reduction in this gap between Watford and St Albans would have a limited impact on this purpose, however would have a “*greater impact on 2nd tier settlements and local levels of visual openness*”.

9.3.1 Whilst it is acknowledged that there would be some loss of local gaps between these smaller settlements, specifically between Bricket Wood and Chiswell Green, the masterplan above shows that all development would be concentrated to the northern side of the site as well as Parcel 26. Likewise, mitigation measures can

easily be incorporated to the south of the site, such as soft landscaping buffers and planting to reduce its visual impact on openness.

9.3.2 In light of the above, it is considered that the site only plays a partial role in its contribution towards preventing towns from merging.

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

Relative to other parcels assessed across the district, Parcel 26 contains a high level of built development at approximately 2.23% of the total area, which is the largest figure out of all the parcels assessed. However, this percentage figure of development would be a lot higher if the SKM Review treated the promoted site in isolation without the remainder of the parcel. The commercial uses on the site equate to approximately 40-50% of the land coverage with built development and hardstanding. Permission has also been granted and implemented for the erection of a 150-bed hotel complex that would inevitably contribute to the site's urban characteristics. As a result, the site displays much lower levels of openness due to the presence of urbanising development and is considered to have limited to no contribution to this purpose.

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

The land does not form part of the historic setting of St Albans or contribute to its special character. This should be limited or no contribution.

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

The site partially comprises previously developed land, with existing buildings/development associated with Burston Garden Centre and therefore there may be potential for replacing some the existing uses in the northern part of the site with residential and commercial development. Other than Burston Garden Centre, the balance of the site is largely undeveloped.

9.7.0 **Summary of harm to Green Belt**

Due to the site's overall limited contribution to the five purposes as set out above, it is considered that a proportion of Green Belt release could take place in this location. This would not compromise the overall strategic importance of the Green Belt and would enable further residential and commercial development to meet the Districts growing housing and employment needs on previously developed land.



Figure 5: Current and Proposed Green Belt Boundary

10.0 PLANNING CONSIDERATIONS

10.1.0 Policy Context

Paragraph 136 of the NPPF states that “... *Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*”.

10.1.1 Paragraph 137 of the Framework states that before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

10.1.2 Further to this, Paragraph 138 of the NPPF stipulates that “... ***where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport*** (my emphasis). *They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*”.

10.2.0 Background

It was concluded by the Inspectors in the examination of the withdrawn Local Plan that the Council could not be satisfied that this had been demonstrated through their site assessment process, nor did the Inspectors agree with statement in Policy S2 that the exceptional circumstances required for Green Belt release only exist in the Broad Locations.

10.2.1 As such, it was suggested that a new Green Belt Review would need to be undertaken in accordance with the Framework, where emphasis is placed on giving first consideration to land which has been previously developed and/or well-served by public transport.

10.3.0 Assessment

As discussed above and in Section 3 of this report, the Council’s starting point for considering suitable Green Belt sites should be previously developed land in order to justify *exceptional circumstances*. Aerial images shown in Figures 2 and 4 clearly illustrate the extent of built development across the site and which is comparatively high when considered against more rural areas of Green Belt in the District.

10.3.1 The commercial uses on the site covers approximately 40-50% of the site and has a mixed operation of retail and ancillary

horticultural uses such that a large proportion of the land holding can be considered as PDL. Likewise, there a number of individual dwelling plots such as The Limes, Copsewood, Cleveland, The Hawthorns and Wexhams that can also be considered PDL as they are separate from the more urban, built-up areas of How Wood and Chiswell Green. Consideration should also be given to the approved and implemented consent for the 150-bed hotel complex that is being developed regardless of the site's potential allocation within the emerging Local Plan. This will substantially increase the amount of PDL coverage on the site.

10.3.2 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 constitutes previously developed land and does not display key characteristics of openness seen in other Green

Belt areas across district. Therefore, any future development would not lead to the loss of the open countryside.

- The site is located away from large built-up areas of London, Luton and Dunstable and Stevenage. The Green Belt Review concluded that site's parcel does not form a connection with a wider network of parcels to restrict sprawl and therefore makes limited or no contribution to this purpose.

10.3.3 Moreover, the masterplan has been designed to promote a sustainable community that can provide the following:

- Housing, including affordable housing;
- Assisted living accommodation;
- Care home;
- Adult social care facility;
- Employment opportunities and office space for SMEs;
- Leisure facilities – a gym, pool and restaurant associated with the hotel but available for use by local residents;
- Retained and expanded retail element provided by Burston Garden Centre as well as supporting other local facilities in How Wood and Chiswell Green.
- Environmental enhancements and improved access to the wider green belt; and
- Improved infrastructure on the North Orbital Road including walking, cycling and public transport upgrades.

10.3.4 The need for housing is well documented, both across St Albans district and within St Stephen Parish. Affordable housing is particularly needed, given the lack of provision in recent years. There is a need for accommodation for older people, both in the form of assisted living accommodation and a care home. We also understand Hertfordshire County Council has expressed a significant need for a facility for adult social care provision and there is scope within the report site to accommodate this.

10.3.5 To reflect the key aims of Policy 1 of Hertfordshire County Council's (HCC's) Local Transport Plan (4th edition) the masterplan provides a mix of uses to encourage internalised, sustainable travel. A community '*hub*' comprising flexible office floorspace would enable future households and other end-users to work away from their home locations, thereby reducing the need to travel off-site.

10.3.6 In addition, the existing Public Rights of Way (i.e. St Stephen 018) would be upgraded to a sustainable transport corridor. This would connect to new foot / cycle infrastructure along either side of the main spine road extending from the primary and secondary accesses, north-eastern side of Lye Lane, and southern boundary of the proposed Castle Oak retirement village, thereby forming a convenient, direct, and safe walking and cycling route, which connects the mixed-use development to the nearby local

centres of Chiswell Green and How Wood to the north and south-east. A new off-road walking route would also be created within the site alongside Lye Lane, thereby helping to avoid pedestrians having to walk on the road along the dangerous 450m stretch of single carriageway road past the site.

11.0 CONCLUSIONS

11.1.0 This site, entitled Burston Park, is being promoted as a new mixed-use neighbourhood including the following uses:

- Retention and expansion of the existing garden centre and retail offerings
- Housing, including 40% affordable housing
- Adult social care facility
- Assisted living accommodation;
- Care home;
- Employment space, including small, flexible, office units
- A hotel (as already consented)
- New public open space, including allotments and woodland planting
- New and upgraded walking, cycling and horse-riding connections across the site

11.1.1 The site is largely made up of previously developed land including the retail garden centre, an aquatics centre, B8 storage and individual dwellings, together with an implemented 150-bed hotel consent. As such, removal of the site would have very limited impact on the Green Belt, as recognised in the Council's previous Green Belt review. In addition, as a well-located and previously developed site in the Green Belt, the site should

receive "first consideration" ahead of undeveloped sites in the Green Belt.

11.1.2 A key benefit of the comprehensive nature of the development is the provision of new and upgraded links for pedestrians, cyclists and horse riders. New links around the edge of the development provide access between How Wood, Chiswell Green and routes to the south on safe, off-road routes which will be attractive to users. These new and upgraded links are supported by the relevant Rights of Way user groups and the highway authority. Not only is this of significant recreational benefit but it also contributes to achieving policy objectives set out in the Local Transport Plan (LTP4) aimed at promoting sustainable forms of transport.

11.1.3 The mixed-use nature of the site reduces the need to travel and key facilities (schools, shops, schools etc) are available within walking distance from the site. Access to bus and rail services, including How Wood and Bricket Wood railway stations (1,000m from the site), means that residents will have a genuine choice about travel modes.

11.1.4 There are no constraints that would prevent development and the majority of the site has been supported in previous Council

assessments. It should be allocated for mixed-use development in the emerging Local Plan.