














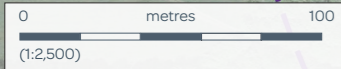
- Site Boundary
- How Wood Railway Station
- Existing Railway Line
- Public Rights of Way
- Bridleway
- Ver-Colne Valley Walk
- National Cycle Route
- Bus Stops
- Existing Water Course
- Flood Zone 2
- Flood Zone 3
- Areas Benefitting from Flood Defence
- Listed Buildings
- Ancient Woodlands
- Local Woodland
- County Wildlife Sites
- SSSI
- Conservation Area

**NOTE:**  
 The site is situated within the Green Belt  
 The site has areas of historic land fill

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-  Site Boundary - 12.26 ha
-  Primary Access
-  Secondary Access
-  Public Right of Way
-  Public Right of Way to be diverted
-  Proposed Pedestrian Connections
-  Residential - 5.88 ha
-  Open Space - 6.38 ha
-  Indicative attenuation features
-  Indicative Woodland and Tree Planting
-  Indicative Local Equipped Area of Play (LEAP)



05 March 2021  
**Delivered by email**

Mrs Tracey Harvey  
Head of Planning and Building Control  
St Albans City and District Council  
Civic Centre  
St Peters Street  
St Albans  
AL1 3JE

Ref: TARC3000

Dear Mrs Harvey

**ST ALBAN'S DRAFT LOCAL PLAN 2020-2038: CALL FOR POTENTIAL DEVELOPMENT SITES 2021  
SITE SUBMISSIONS ON BEHALF OF TARMAC.**

We are instructed by our clients: Tarmac, to submit various site submissions in connection with the above consultation, in respect of the following four promoted development sites in St Albans District, all of which, are within the freehold ownership of Tarmac.

The four promoted sites contained within these call for sites submissions are:

- **Land South of London Colney**
- **Land at Colney Heath**
- **Land at Moor Mill North**
- **Land at Tyttenhanger**

Tarmac is an established land promotion and development company with a significant portfolio of freehold and other commercial land interests in St Albans District. Tarmac is also a major national employer with nationwide experience of bringing forward strategic development sites of all scales for new residential, mixed-use and commercial and industrial development.

Tarmac is promoting four of its numerous freehold sites in the south of the St Albans District in the A414 and M25 corridors for potential residential, employment and other related development, including new transport infrastructure and contributions to the public realm. Turley has been instructed to prepare four separate site submissions in relation to each of these promoted site locations which are attached to this correspondence. The main attributes of the four promoted Tarmac sites are set out in the following overarching summary:

Our complete submissions comprise this overarching summary and four individual written site evaluations. Each site evaluation also has three related drawing Appendices (a red line plan, a constraints plan and a Framework Masterplan). Our overall site submissions on behalf of Tarmac comprises 17 items in total.

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## Land South of London Colney

This promoted site, comprises 32.75 hectares of previously used land located to the south of London Colney immediately to the north of the M25 and south of the River Colne, as shown on the red line plan at **Appendix 1** of the attached South London Colney site evaluation.

The Framework Masterplan proposals set out at **Appendix 3** of the South London Colney site evaluation illustrate a viable scheme for circa 750 new market and affordable homes, set over 18.79 hectares, a new two-form entry Primary School, located on a 2.25 hectare site and a new Local Centre occupying 0.30 hectares. The broad concept of the proposal is to provide a new Garden Suburb to South London Colney in the area between the existing Colney Fields Retail Park and Shenley Lane, with the area to the south bounded by the M25. A further 11.41 hectares (35%) of the site will comprise formal public open space, children's play provision, semi-natural green spaces, incidental open green areas and structural landscaping. Vehicular access to the site will be via Shenley Lane to the west (B5378) with further pedestrian and cycle connections to London Colney High Street.

The development proposed on this site is in a highly sustainable, well connected and self-contained, location. The promoted site lies adjacent to major existing retail facilities and close to the historic village core. The Site also lies within a strategic Sub-Area previously identified in the 2014 St Albans Green Belt Review as one of the Sub-Areas contributing least to the purposes of the Green Belt. Therefore this site serves little or no existing Green Belt function and can make a strong sustainable contribution to future housing land supply in St Albans District. As such, the site is highly suitable for detailed consideration for sustainable new development.

The South London Colney site has been previously worked for minerals and landfilled and so consequently has little in the way of existing landscape character. In addition, two of its boundaries are set in an urban context as the site is located directly adjacent to existing major retail facilities and close to national transport infrastructure. South London Colney can therefore be brought forward in the new Local Plan as a residential site to create a cohesively located, sustainable new Garden Suburb, to which it is well suited. The development of the South London Colney site for mixed-use purposes would also be a more efficient and sustainable use of land in this urban fringe location. This development of this previously used site could also help to reduce development pressures on other, more functional and visually sensitive areas, of the Green Belt, within St Albans District.

A comprehensive Vision Document is currently in preparation for this site, in lieu of the consultation stages of the emerging Draft Local Plan, which will provide additional technical details.

## Land at Colney Heath

The promoted site at Colney Heath comprises 43.58 hectares of open grassland, local woodland and a lake adjacent to the southwest boundary, located to the south east of the A414, between the villages of Colney Heath and Sleafshyde, as shown on the red line plan at **Appendix 1** of the Colney Heath site evaluation.

The hybrid development proposals at Colney Heath, are primarily intended to serve as a new Country Park, which would occupy circa 89% of the total site area. The residual 11% of the Colney Heath site is proposed to accommodate employment and a small scale residential use together with new public transport infrastructure provided in the form of an MRT interchange, to deliver sustainable growth within the A414 corridor on the most unconstrained areas of the site.

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The Framework Masterplan proposals set out at **Appendix 3** of the Colney Heath site evaluation illustrate a viable scheme for an employment-led, hybrid development, comprising 3.70 hectares of employment land, approximately 30 new homes adjoining the existing village envelope on a small, one hectare, site and a transport interchange connected to the A414 and a new 33 ha Country Park. The Framework Masterplan also proposes a further 5.66 hectares of formal and informal public open space associated with the new built development.

The Tarmac proposals at Colney Heath meet the core objectives of the NPPF in that there is an opportunity to establish a diverse, high quality, County Park for the long term benefit of all residents of St Albans District, facilitating the release of a further area of Tarmac land for employment, residential and transport infrastructure purposes, in accordance with a sustainable pattern of development. The scale of the residential component is also in accordance with the 10% target set by Paragraph 68(a) of the NPPF.

## Land at Moor Mill North

The promoted site at Moor Mill North comprises 12.26 hectares of open grassland with local woodland located in the western area of the site, adjacent to the River Ver, which forms the western boundary. The site is located on the western edge of Frogmore Village and adjoins the extensive rear gardens of the residential properties which front Radlett Road, as shown on the red line plan at **Appendix 1** of the Moor Mill North site evaluation.

The Framework Masterplan proposals set out at **Appendix 3** of the site evaluation illustrate a viable scheme for a landscape-led, residential development of approximately 5.88 hectares, comprising up to 180 new market and affordable homes. The Framework Masterplan proposes a further 6.38 hectares of natural greenspace in the form of a new Community Woodland and public open space associated with the new residential development.

One of the main considerations in the Framework Masterplan is to provide an integrated and sympathetic extension to the existing village envelope, which will provide new homes and assist with community cohesion. As such, the site is promoted as a small garden village suburb of Frogmore, with a strong semi-rural character. This is reflected in the proposed low ratio of built form to useable natural greenspace.

This promoted site forms part of a much larger Tarmac land holding at Moor Mill. The wider Tarmac owned land parcel in question at Moor Mill North is roughly triangular in form and is enclosed by the settlement boundary of Frogmore to the east, the How Wood Railway Line to the west and the M25 corridor to the south. The overall scale of the Tarmac land holding in this area is circa 90+ hectares. In this regard, the built form of the proposed development at Frogmore equates to no more than 5.88 hectares. This therefore represents less than 7% of the overall site area within Tarmac's total land ownership at Moor Mill North.

## Land at Tyttenhanger

The promoted site at Tyttenhanger comprises two separate land parcels, which are bisected by a shared private access road. The north eastern land parcel is 18.07 ha in area and this comprises an active Tarmac operational unit (Tyttenhanger) with associated buildings. The land parcel to the south west is 13.07 ha in area and is broadly triangular in shape. This adjacent site has also been previously used for mineral extraction and has been restored to open pasture fronting the A414, which forms the northern boundary. The latter site is immediately available as a development opportunity now, save for an initial period for site preparation, given its historic use.

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The remaining two boundaries comprise the access road to the north east and a wooded tree belt to the south, which separates this parcel from a nature reserve further south (Willows Lakes). The northern apex of the lower site adjoins a petrol filling station which fronts the A414 and which has a local waste management operator located behind the petrol station premises within the same general curtilage. The overall combined site is circa 31.14 ha in area and is promoted for a broad range of uses, comprising employment, commercial, leisure and residential. However given the current operational activity on the upper site, the timing of when each parcel can come forward will be at different points in the plan period.

As such, the upper site is not being promoted at this time for general residential use, although Tarmac reserve judgement on this position in the medium term, given that a large new settlement is also being promoted in close proximity to Tarmac's promoted site on other neighbouring land in Tyttenhanger, in Hertsmere District. This authority is currently in the process of finalising their Draft Local Plan for examination.

The Framework Masterplan proposals set out at **Appendix 3** of the site evaluation illustrate a viable scheme for an employment-led, hybrid development, comprising 4.66 ha of employment land in the upper site parcel and 7.33 ha of developable land, for a broader range of uses, in the lower site parcel. The lower site parcel is also suitable for potential residential use, as a large new settlement is being actively promoted in Hertsmere District, on an adjacent site in Tyttenhanger, which presents key opportunities under the Duty to Cooperate.

Given its A414 frontage location, the Tarmac site at Tyttenhanger has the potential to host an MRT stopping point and a new transport interchange, which could be of mutual benefit to the Tarmac site proposal and the adjoining potential new settlement. The remaining undeveloped 60% of the Tarmac site at Tyttenhanger would also help to offset the built form of the development by improving the environmental quality, accessibility and biodiversity of the site. The proposals are therefore in accordance with the aims and objectives of the NPPF.

In conclusion, the attached four site submissions and their appendices identify four sustainable Tarmac owned sites for development and set out a summary case for their future allocation for the range of uses described. With regard to the largest of these proposals, at South London Colney, these submissions are made in lieu of additional forthcoming technical submissions, which will be set out in a Vision Document in production.

Further technical details of the other promoted Tarmac sites will also follow these site submissions in lieu of future Local Plan consultations. However in the interim, should St Albans Council require any additional information on any specific site, Tarmac and its consultant team will be able to address any technical queries on request and welcome the opportunity to further engage with the Council.

Yours sincerely

[Redacted signature]

[Redacted name]  
[Redacted title]

**On behalf of Tarmac**

[Redacted name] Enc.

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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	Clowes Developments
Address	Ednaston Park, Painters Lane, Ednaston, Derbyshire
Postcode	DE6 3FA
Telephone	01335 933725
Email	██
Your interest	<input checked="" type="checkbox"/> Site Owner <input type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input checked="" type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other



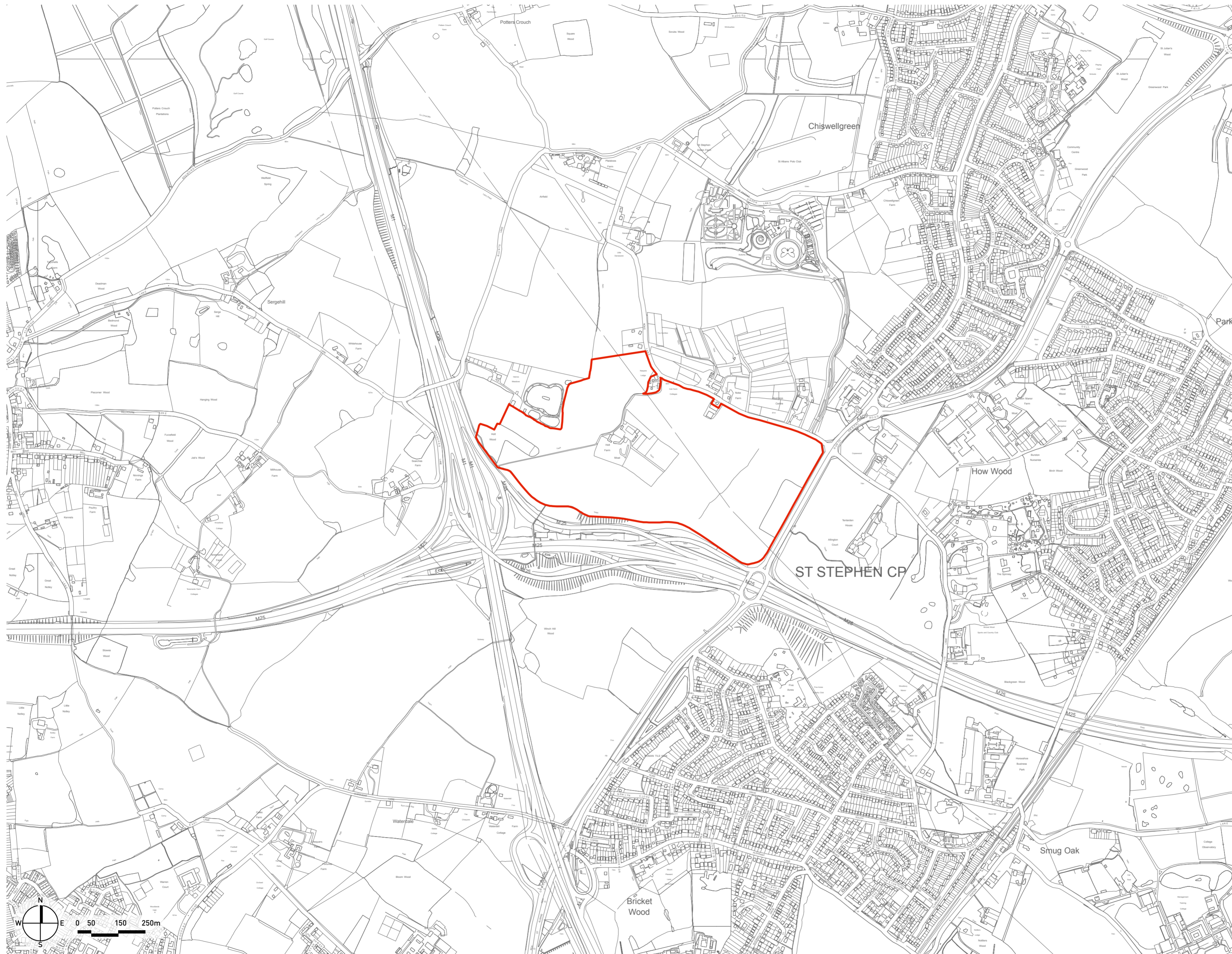
<b>Site Details</b>					
<b>Requirements:</b> <ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Noke Lane, South of Chiswell Green, St Albans				
Site area (in hectares)	56.48ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table>	Easting		Northing	
Easting		Northing			
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
Landownership (please include contact details if known)	Freehold land owned by Clowes Developments ( [REDACTED] ) [REDACTED] Holt Farmhouse owned by a third party.				
Current land use	Agriculture, short term tenancy				
Condition of current use (e.g. vacant, derelict)					
Suggested land use	<input type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input checked="" type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	This Noke Lane site is considered suitable for high quality employment development comprising a mix of employment generating uses.				

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

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

	Other constraints affecting the site	<input checked="" type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No  There is an overhead powerline crossing the site; employment development with either be designed around this or the pylons will be diverted.
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input checked="" type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history)  No material planning history	
Other comments	The site is well located close to the M25 and M1 motorways and to the urban areas of St Albans and Chiswell Green, making it highly attractive to employment generating occupiers.  Whilst designated as Green Belt, the fractured and disjointed character of the Green Belt in this area would not be unduly harmed by sensitively designed and landscaped employment development.	

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**KEY**

 **SITE LOCATION**

# NOKE LANE COMMUNITY VILLAGE, ST. ALBANS, HERTFORDSHIRE - SITE LOCATION PLAN





# Land at Noke Side

## West of Chiswell Green, St Albans AL2 3EF

St Albans Call for Sites response 2021

Planning Report on behalf of the owners of land at Noke Side, Chiswell Green

**DLA Ref: 1996/044**  
**March 2021**

## CONTENTS

1.0	INTRODUCTION .....	1
2.0	SITE & CONTEXT ANALYSIS.....	3
3.0	STRATEGIC CONTEXT .....	7
4.0	PLANNING HISTORY.....	9
5.0	PREVIOUS SHLAA ASSESSMENT .....	10
6.0	SITE CONSTRAINTS .....	11
7.0	OUTLINE OF PROPOSAL.....	12
8.0	GREEN BELT IMPACT .....	14
9.0	DELIVERABILITY .....	17
10.0	CONCLUSIONS .....	19
11.0	APPENDICES .....	20
	Appendix A – Indicative Layout - AT Architecture.....	20
	Appendix B – Landscape and Green Belt Statement (JBA).....	20
	Appendix C – Preliminary Ecology Appraisal (JBA) .....	20

## 1.0 INTRODUCTION

1.1 This report is submitted in response to the Call for Sites on behalf of the owners of the land at Noke Side in Chiswell Green. The site lies adjacent to but outside the previously proposed Broad Location West of Chiswell Green and is being promoted for residential development.

1.2 8 Broad Locations were previously identified by the Council's Green Belt consultants as capable of being released without harming Green Belt purposes. Although this work now needs to be updated and the scope of the Review widened, the principle of development to the west of Chiswell Green should be one of the foundations on which to build a new Local Plan.

1.3 Nevertheless, the boundary of the proposed Broad Location identified in 2013 is no longer appropriate given the change in circumstances since then and the fact that it is not clearly defined using readily recognisable physical features. In addition, the size of the Broad Location as a whole was not large enough to support and fund the delivery of the two-form entry primary school required. While inclusion of the site at Noke Side cannot address this issue in itself, it can help to narrow the funding gap and make the school more viable.

1.4 The proposed Broad Location should be expanded to include land at Noke Side, which forms a suitable and sensible addition to it. There are no technical constraints that would prevent development and the submitted evidence at Appendices A, B and C demonstrate the deliverability of the site.

1.5 In particular, the Landscape and Green Belt Assessment of the site undertaken by James Blake Associates illustrates that the site makes *"zero contribution"* to Green Belt Purposes 1 and 4 and a *"low contribution"* to Green Belt Purposes 2 and 3. The report highlights the strong relationship with built development at Chiswell Green and the relative containment of the site to the south-west and west. The report concludes that the *"release of the Site would have no effect on the ability of the remaining Green Belt land to perform the purposes and functions of the Green Belt, and the Site would form a logical extension to the land already considered suitable for Green Belt release to the immediate north"*.

1.6 The site seems to have been excluded from the adjoining site by the consultants on the basis of the trees and scrub on the site. However, most of these trees were removed some time ago and there is no reason why this site could not come forward as part of the wider development. I note the Council's assessment of sites in the SHLAA reaches a similar conclusion.

- 1.7 However, with its own access, this site is also capable of coming forward independently of the wider site and could be delivered quickly.
- 1.8 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 1.9 The site at Noke Side should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.



## 2.0 SITE & CONTEXT ANALYSIS

### 2.1 Location

The report site is located on the western boundary of Chiswell Green and abuts the residential road of Noke Side. The site is located to the west of Noke Side and abuts the gardens of Nos 2-4 Noke Side and 60-68 Long Fallow to the south east and Miriam Lane to the north west. It has an area of 1.2 hectares.

### 2.2 Context

Noke Side and Long Fallow are part of a suburban residential area to the north-west of Chiswell Green, characterised by small to medium modern detached houses. The area south of the report site along Belvedere Gardens is characterised by well-spaced modern terraced housing.

2.2.1 Given the use of the land and the clearly defined boundaries of the site, rather than having the appearance of an area of open countryside, the site has the appearance of an area of residential land, associated with, and forming part of the settlement of Chiswell Green.



*Figure 1: Report site and SKM's proposed Green Belt boundary (approximate boundaries)*

### 2.3 Land uses

The site is adjacent to the previously proposed broad location west of Chiswell Green as shown on the aerial photograph in Figure 1. Both sites are currently used for grazing. The extent of the boundary between the site and the proposed Broad Location to the north-east of the site is also graphically illustrated in the Landscape and Green Belt Statement at Appendix B. Figures 2, 3 and 4 below are taken from this report and the photographs are used with the permission of James Blake Associates.



*Figure 2: View C – View north-west from south-eastern site boundary*



*Figure 3: View H – View south-east from within the Site*



*Figure 4: View J – View north-east from within the Site*

2.4 **Access**

Access to the site is from Noke Side adjacent to No 4 as shown in the aerial photograph in Figure 5 below. Figure 5 also illustrates the location where the photos at Figures 2, 3 and 4 were taken.



Figure 5 Aerial photograph © Google Maps

2.5 **Development Plan Notation**

The site is within the Metropolitan Green Belt adjacent to the Specified Settlement of Chiswell Green as defined by the Adopted Local Plan Review 1994.

2.6 **Local services**

The Site is in close proximity to Chiswell Green, a large village with a good variety of shops and services. The local facilities are set out in the Table below.

Table 6: Summary of Local Services (approximate measurements)

Facility	Local Provision	Proximity to site (m)
Education	Killigrew Primary School	1,200m
	The Marlborough Science Academy	2,005m
Retail	Post Office	595m
	Starbucks Coffee	180m
	Burston Garden Centre	325m
Places of worship	Chiswell Green Church	260m
Health	Midway Surgery	1,400m
Leisure	Otium Sports Club	100m
	Greenwood Park	995m

## 2.7 **Accessibility**

The Report Site is well served by public transport services as set out below.

### **Bus**

The site is located within 120m of a regular bus route that extends along Watford Road (B4630) to St Albans City Centre or to Watford.

### **Rail**

St Albans City Station is located some 4 km to the north east of the Report Site, providing frequent direct services to St Albans, St Pancras International, Gatwick Airport and Brighton to the south and Luton Airport, Luton and Bedford to the north. Also, St Albans Abbey line is located some 2.9 km to the north east of the Report Site, providing frequent direct services to Watford Junction.

## 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 33rd 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.

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

### **Green Belt considerations**

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

3.9 The land to the north of the report site was previously identified as the proposed Broad Location West of Chiswell Green. While this site still appears suitable for housing, there were two elements of unsoundness from the now-withdrawn draft Local Plan that need to be addressed in the new Local Plan:

- The previous location of the Green Belt boundary was not supported by proportionate evidence and was inconsistent with Government policy as it was not clearly defined using readily recognisable physical features; and
- The Broad Location as a whole was not large enough to support and fund the delivery of the two-form entry primary school previously required by Policy S6 (X). While inclusion of the site at Noke Side cannot address this issue in itself, it can help to narrow the funding gap and make the school more viable.

3.9 The proposed Broad Location should be expanded to include land at Noke Side, which forms a suitable and sensible addition to it.

## 4.0 PLANNING HISTORY

### 4.1 Site

There is no relevant planning history for the report site.

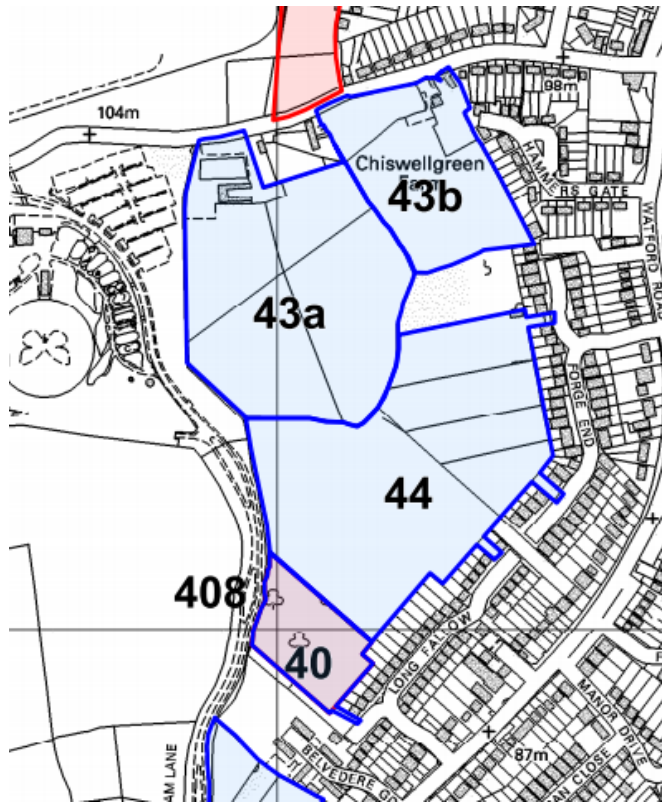


Figure 7 Extract from Map of sites by Settlement (Chiswell Green etc)  
SHLAA 2016

## 5.0 PREVIOUS SHLAA ASSESSMENT

5.1 This site has been submitted through previous Call for Sites invitations and was assessed by the Council in the 2016 Strategic Housing Land Availability Assessment (SHLAA). It was given the reference SHLAA-GB-CG-40 and the site was divided into parts A and B with part A being closer to Noke Side.

5.2 At that stage the officers' Conclusions were *'The site is rural in nature and development would constitute significant encroachment and visual intrusion into open countryside. However, it could be argued that the site (and adjoining Sites 43a, 43b, 44 and 96) would be suitable for residential development in principle and that any new housing could be suitably screened from the surrounding countryside.'*

*Any development potential needs to be considered in the context of the new link road to the Butterfly World site and the expansion of the Thistle Hotel.'*

5.3 In answer to 'is there a reasonable prospect that housing will be developed on the site?' the Council stated: *'Yes, after due consideration through the LDF process, given the site's location in the Green Belt, on the edge of the specified settlement of Chiswell Green. Any development potential needs to be considered in the*

*context of the cumulative impacts on infrastructure in the area, in the light of current developments in the immediate area.'*

5.4 Under the heading capacity assumptions, the Council stated: *'Assuming the overall site, both parts A and B, were developed for housing, with a mix of dwelling types appropriate to the area (principally two and three storey family housing, including semi-detached and townhouses).*

*The site would also likely be built in conjunction with adjoining proposed sites, if developed at all, which may slightly increase achievable density. Substantial existing tree screening and likely some of the more mature and sizeable trees inside the site will need to be retained, reducing overall density.*

*Approximately 25 dwellings per hectare is a reasonable estimate, on approximately 1 hectare of overall site, in Zone 6.'*



## 6.0 SITE CONSTRAINTS

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

### 6.2 Contamination/Pollution

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

### 6.3 Environmental issues

The site does not contain any significant trees or hedgerows contrary to the LPA assessment in 2016. This can be seen from the landscape photographs in Figures 2, 3, 4, and 5. The Preliminary Ecological Appraisal (Appendix C) concludes that the *'proposed development is considered unlikely to be adversely detrimental to designated areas, protected species or habitats, provided the recommendations are followed'*.

### 6.4 Flood risk

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

### 6.5 Topography

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

### 6.6 Utility services

It is likely that utilities are available in Noke Side to which a connection could easily be made.

### 6.7 Legal issues

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

### 6.8 Access

The existing access adjacent to No 4 Noke Side would be used and is shown in the indicative layout submitted.

### 6.9 Other constraints

The site could easily be linked with the land to the north identified in the Broad Location West of Chiswell Green.

## 7.0 OUTLINE OF PROPOSAL

7.1 This site is adjacent to the land at Chiswell Green previously identified by the Council's consultants SKM in their February 2014 report. At that stage, the site seems to have been excluded from the site identified by SKM on the basis of the trees and scrub on the site. However, most of these trees were removed some time ago and there is no value in retaining this site as undeveloped, adjacent to a proposed strategic development site. With a site area of around 1.2ha the site is capable of extending the adjacent proposed strategic development site, as well as coming forward as a free-standing site served by its own access.

### 7.2 Form of development

To provide an indication of development capacity, AT Architecture has provided an illustrative development layout. This layout provides for a total of 32 units, of which 13 would be affordable in line with the Council's emerging policy requirement of 40%. The layout also provides a self-build plot in line with the requirement for 3% of dwellings to be self-build.

7.3 The layout is centred on the large retained tree in the centre of the site. This creates an attractive focal point around which development is orientated. The existing boundary vegetation

along the south-west and north-west boundaries can be retained.

7.4 Vehicular access is shown from Noke Side via an existing access. Alternatively, access could be taken from the Council's proposed Broad Location to the north-east. As a third option, access could be taken from the road to the rear of the site known as Miriam Lane.

### 7.5 Benefits of development

The site is adjacent to the built-up area of Chiswell Green and would be a sensible and logical addition to it either in association with the land to the north or as a stand-alone development. The site is within walking distance of a range of local facilities including a local school and local shops as set out in Section 2.

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

Figure 8 Indicative housing layout



## 8.0 GREEN BELT IMPACT

8.1 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. The Landscape and Green Belt Statement report attached at Appendix B has been produced by James Blake Associates and represents a site-specific review of the contribution to Green Belt purposes made by this site. The report uses the conclusions of the SKM Report from 2014 but updates matters and provides a site-specific assessment.

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

The Landscape and Green Belt statement considers that the site makes a 'zero contribution' to Green Belt Purpose 1 as the parcel is located away from built up areas of London, Luton, Dunstable and Stevenage.

### 8.3 **Purpose 2- to prevent neighbouring towns merging into one another**

The Landscape and Green Belt statement considers that the site makes a 'low contribution' to Green Belt Purpose 2 as development of the parcel would result in very little physical

and/or visual encroachment between the Primary Settlements of St Albans, Watford, Hatfield, Harpenden, London Colney and Hemel Hempstead

### 8.4 **Purpose 3 - to assist in safeguarding the countryside from encroachment**

The Landscape and Green Belt statement considers that the site makes a 'low contribution' to Green Belt Purpose 3 as the urban edge of Chiswell Green is a strong urbanising influence.

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

The Landscape and Green Belt statement considers that the site makes a 'zero contribution' to Green Belt Purpose 4 as the Parcel is not considered to form part of the landscape setting of a historic town..

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

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

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

The report highlights the strong relationship with built development at Chiswell Green and the relative containment of

the site to the south-west and west. At para 7.2.6 the report states:

*It is considered that the Site is a suitable location for development, and for release from Green Belt, having a high capacity to accommodate to change. Residential development would be physically and visually connected to the existing western edge of Chiswell Green, new tree planting throughout any proposed development would help integrate the built structures within the local landscape character. Through good design development of the Site would be able to provide Green Infrastructure benefits in accordance with NPPF Paragraph 141'*

8.8 The report concludes with:

*"Release of the Site would have no effect on the ability of the remaining Green Belt land to perform the purposes and functions of the Green Belt, and the Site would form a logical extension to the land already considered suitable for Green Belt release to the immediate north."*

8.9 This report provides a strong justification for removing the site from the Green Belt and incorporating it into the adjacent broad location.

8.10 **New position of Green Belt boundary**

An alternative Green Belt boundary has been illustrated in Figure 9 below. This would follow the Broad Location West of Chiswell Green but extend southwards to include the report site. This would provide a more definable boundary than that proposed between the report site and the Broad Location.

**Figure 9 Proposed Green Belt Boundary**



## 9.0 DELIVERABILITY

9.1 During the previous Local Plan examination, representations were made on behalf of the landowner highlighting the concern that the delivery of a two form-entry (2FE) primary school from a site of 365 dwellings was highly questionable. This issue must be addressed in the new Local Plan.

9.2 The now-withdrawn draft Local Plan Policy S6(X) was unsound because it was based on the delivery of a 2FE primary school when the site itself only generated 0.73FE. 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”). Previous 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)*

9.3 Unless the previously proposed site is expanded, there will remain 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.

9.4 The land being promoted at Noke Side is just less than 1ha in size. The indicative layout attached at Appendix A shows the site accommodating 32 units, of which 13 would be affordable. While this scale of additional development does not fully solve the school funding gap, it nevertheless would make a meaningful contribution to narrowing the gap. Any remaining funding gap could be narrowed through the addition of other small and medium-sized sites that DLA Town Planning maintains are needed to make the emerging Local Plan sound.

9.5 **Landownership**

The site is within a single ownership and could be developed quickly without ransom strips.

9.6 **Timescale for delivery**

The site could be developed quickly within the next five-year period.

9.7 **Supporting technical work**

The submission is accompanied by the Landscape and Green Belt Statement and Preliminary Ecology Appraisal by James Blake Associates.



## 10.0 CONCLUSIONS

- 10.1 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 10.2 The site at Noke Side is adjacent to the previously proposed Chiswell Green Broad Location identified by the 2014 Green Belt Review. The aerial photographs in this report illustrate the relationship between this site and the adjoining strategic site. The site seems to have been excluded from the adjoining site by the consultants in 2014 on the basis of the trees and scrub on the site. However, most of these trees were removed some time ago and there is no reason why this site could not come forward as part of the wider development. I note the Council's assessment of sites in the SHLAA reaches a similar conclusion.
- 10.3 However, with its own access, this site is also capable of coming forward independently of the wider site and could be delivered quickly.

## 11.0 APPENDICES

Appendix A – Indicative Layout - AT Architecture

Appendix B – Landscape and Green Belt Statement (JBA)

Appendix C – Preliminary Ecology Appraisal (JBA)