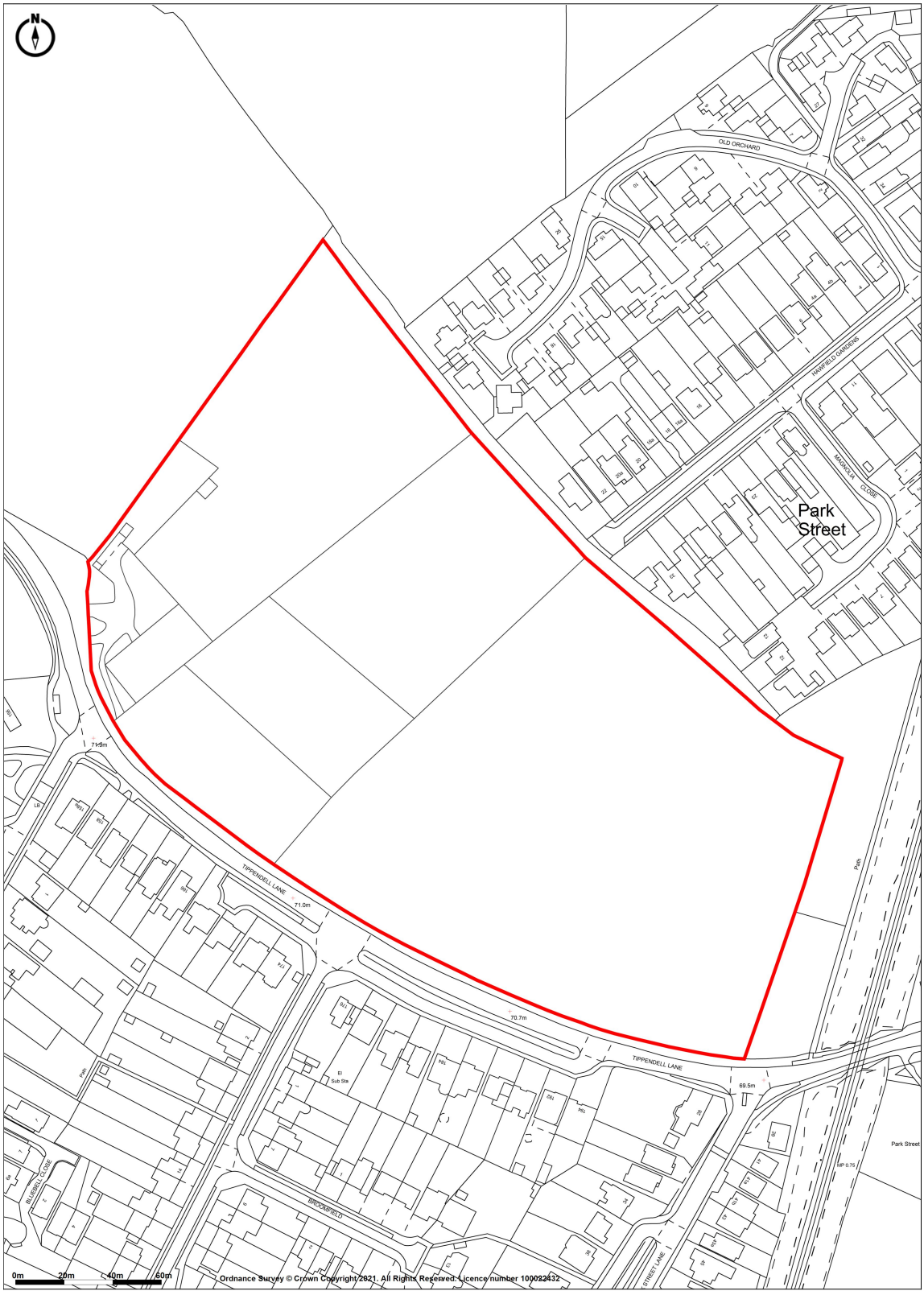
Site Location Plan



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Direct Dial: 01223 459433
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Our ref: DF/211401

8th March 2021

BY EMAIL: planning.policy@stalbans.gov.uk

Dear Sir or Madam

Re: St Albans City & District Local Plan 2020-2038: "Call for Sites" - Land North of Tippendell Lane, Park Street, St Albans.

Strutt & Parker are instructed by the [redacted] in relation to St Albans City & District's Local Plan 2020 - 2038 Call for Sites. We understand that site suggestions put forward will be used to inform the preparation of the new Local Plan 2020-2038 and will be considered in the Council's Housing and Economic Land Availability Assessment (HELAA). This call for sites submission relates to Land North of Tippendell Lane, Park Street, St Albans as set out at Figure 1.

Whilst it is understood that the Council will take account of the sites already included in the Strategic Housing Land Availability Assessment (SHLAA) this submission provides an up to date assessment of the site, the current circumstances and justification for its inclusion in the new Local Plan 2020-2038. This letter should be considered in conjunction with the accompanying information:

- Call for Sites – Site Identification Form;
- Site Location Plan;

The land is being promoted by a single landowner, as a residential development site for market and affordable housing including an area of extensive public open space. It is considered that the site could deliver between 100 and 120 new homes. In addition, the extensive area of open space will deliver compensatory environmental Green Belt enhancements, opportunities for significant tree planting, biodiversity gains, improved carbon performance and public access.

This letter provides an overview and analysis in terms of identified housing need, having regard to the National Planning Policy Framework 2019 (NPPF) and the need for the inclusion of a significant number of additional site allocations for the future new Local Plan to successfully meet the tests of soundness. It sets out the details of the site being proposed as an allocation, how it can be considered to represent sustainable development, its suitability for release from the Green Belt and its deliverability.

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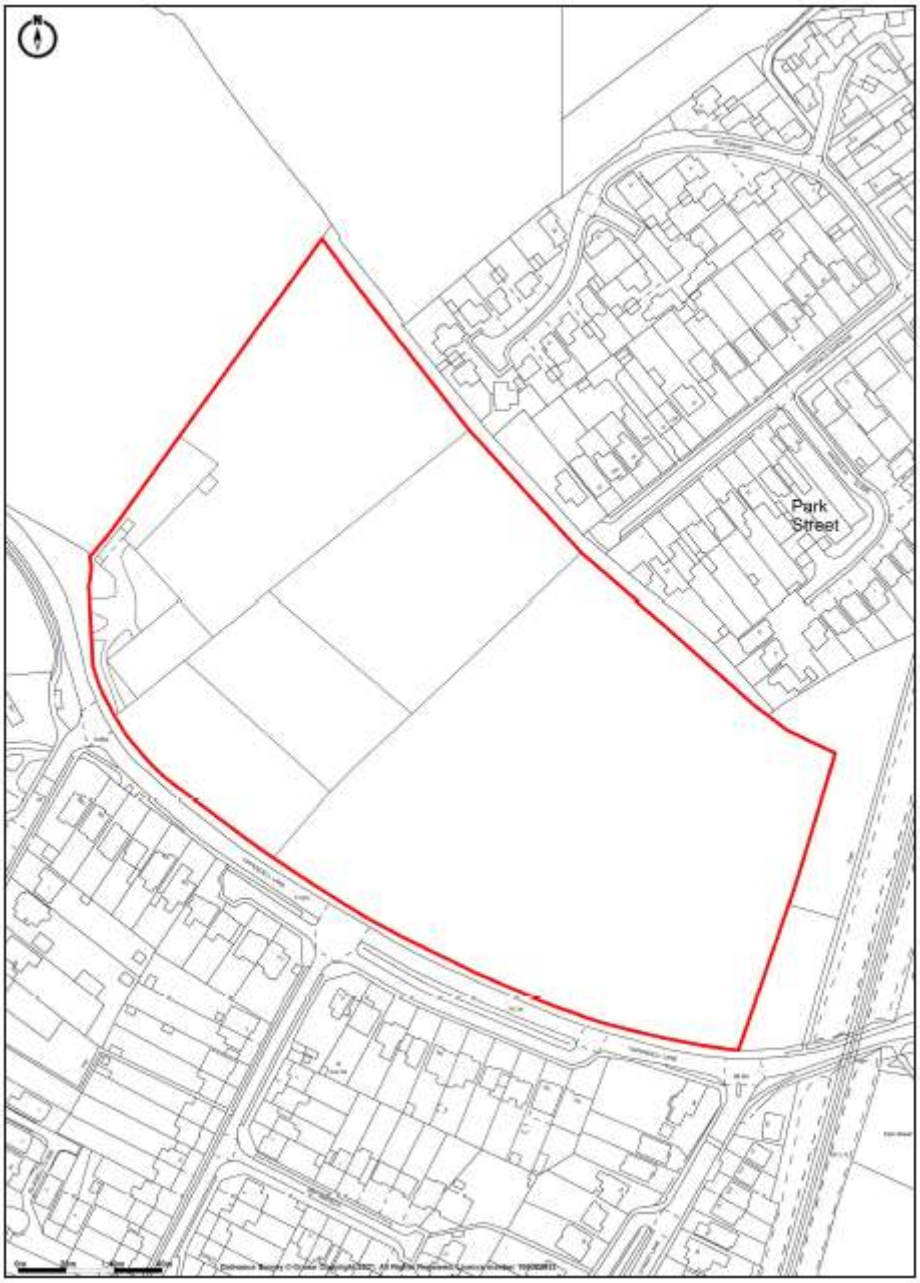

Figure 1: Site Location Plan, Land North of Tippendell Lane Park Street, St Albans

Background

The previously prepared new Local Plan 2020-2036 was submitted for Examination on 29th March 2019. Following the stage 1 hearing sessions held in January 2020, the Local Plan Inspectors wrote to the Council on 27th January 2020 raising serious concerns in respect of the legal compliance and soundness of the Plan and cancelled subsequent hearing sessions. This was then followed by further correspondence between the Inspectors and the Council, including the Inspectors' letters of 14th April 2020 and 1st September 2020. The Council subsequently withdrew the Plan and have now commenced work on a new Local Plan 2020 – 2038.

Whilst the Inspectors had fundamental concerns in respect of the duty to cooperate, a factor which cannot be remedied once a plan has been submitted for examination, they also raised a number of other serious concerns in relation to Green Belt release and the Plan's ability to meet the area's objectively assessed needs.

One of the major issues the Inspectors had was in respect of the the proposed Park Street Garden Village Broad Location an allocation, for 2,300 dwellings, on the same site as the proposed Strategic Rail Freight Interchange which already has benefit of planning permission. The garden village proposal is unlikely to go forward meaning that the district will have to allocate alternative sites to make up the shortfall.

A further key issue was the Plan's reliance on a small number of large strategic allocations (500 dwellings or more, or over 14 ha) at the expense of smaller scale subareas identified in the Green Belt study (GB 004) and the contention that the small scale subareas identified in the study were not necessarily exhaustive and had not been properly assessed. Parallel concerns were also raised in respect of this approach in respect of the sustainability appraisal. In short, it was suggested that there may be considerable potential for small-scale boundary changes which would not necessarily compromise the overall function of the Green Belt and may represent a more sustainable option, available to meet the Council's housing need, by bringing forward smaller scale sites.

The Inspectors then went on to note that a range of sites, including smaller sites, can provide benefits, in that they can be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately. They also referred to paragraph 68 of the NPPF which indicates that, small and medium-sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.

The Inspectors also raised the matter of compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, as set out in paragraph 138 of the NPPF, and whether the plan had identified such compensatory improvements or would in fact be able to deliver any.

Finally, in respect of altering Green Belt boundaries, the Inspectors reminded the local authority that the Courts have found that the 'exceptional circumstances' test for altering Green Belt boundaries through plan making is less demanding than the 'very special circumstances' development control test, for permitting inappropriate development in the Green Belt. Essentially, the time for amending Green Belt boundaries is through the preparation or updating of plans.

In respect of the Inspectors concerns about the Plans overreliance on large strategic allocations, it is worth noting that the Council are not alone in failing to convince an Inspector of the soundness of such an approach. Whilst not directly comparable given the limited extent of the Green Belt, the findings of the Inspector in 2020, in respect of the examination of the Uttlesford Local Plan were similar. In that particular case, the Inspector considered it was highly ambitious to rely on three new Garden communities (Easton Park, North Uttlesford and West of Braintree) and not include a wider range of small and medium sized sites as advocated by paragraph 68 of the NPPF.

The New Local Plan 2020-2038

The new Local Plan will provide the basis for meeting the land-use needs of the District up to 2038 in accordance with the Government's economic, environmental and social priorities set out in the NPPF. At paragraph 11 the NPPF establishes a '*presumption in favour of sustainable development'* which means that: '*plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexibility to adapt to rapid change.'*

Paragraph 59 confirms the Government's objective to *'boost significantly the supply of housing'* and the importance which it places on a sufficient amount and variety of land coming forward where it is needed. The NPPF requires local authorities to identify and update annually a supply of specific deliverable sites, sufficient to provide five years' worth of housing. In addition, the NPPF also requires local authorities to meet the recently

introduced Housing Delivery Test. According to the most recently published monitoring report (2020), the Council can only demonstrate a 2.4 year housing land supply. In addition, the latest Housing Delivery Test results for 2020, show a delivery over the last three years of only 63%, triggering the presumption in favour of sustainable development. Clearly, the District is not complying with the Government's objective to boost its housing supply significantly and this shortage of housing supply and delivery must be considered a critical issue for the District. Such a shortage of housing will make it extremely difficult for the District to maintain its economic competitiveness and will also perpetuate a social imbalance through the lack of both market and affordable housing.

It will be essential that the new Local Plan rectifies this situation immediately. These are tough challenges, especially given the plan preparation timetable. The most obvious strategy will be for an ambitious release from the Green Belt of a sufficient number of deliverable (emphasis added) small and medium-sized sites, such as our clients' site at land North of Tippendell Lane Park Street. Furthermore, if the development of the new Rail Freight Interchange progresses, this will increase the sustainability of the area enhancing its suitability for further housing growth.

The Council have now started work on the preparation of a new Local Plan 2020 – 2038 which it hopes to have adopted by the Government target of December 2023 when all local planning authorities are expected to have up-to-date local plans in place. This is an ambitious timetable for the Council given the extent of additional evidence work that will have to be undertaken to remedy the shortcomings identified by the Planning Inspectors in respect of the previous Plan. Council officers have indicated that this will be a new plan and they are starting with a blank sheet of paper. Accordingly, it is critical that the assessment of sites submitted through this Call for Sites process is a robust process. In particular, that a fair and balanced appraisal of their performance in terms of the functions of the Green Belt is undertaken at a site specific level. Such an assessment should also take into account the site's ability to deliver compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, as set out in paragraph 138 of the NPPF. Such compensatory improvements are even more relevant today given need to deliver biodiversity net gains and that the Council declared a Climate emergency in July 2019 and has pledged to make the District carbon neutral by 2030. The opportunity to identify sites for carbon offsetting through this Local Plan will be essential to help meet these challenges.

The new Local Plan will need to identify sites to deliver over 15,000 new homes to meet the Council's housing needs. Whilst it is possible that some 5,000 new homes may be found on urban sites it seems inevitable that Green Belt release will be required to accommodate approximately 10,000 homes. To maintain their housing trajectory, the Council will need to identify a range of sites, so that a housing delivery rate in excess of 900 homes per year can be maintained. In recent years, such a level of delivery has not been achieved. This delivery step change is essential for the social, economic and environmental prosperity of the District. Simply put, without the allocation of sufficient deliverable sites the Council will not be able to realise the corporate objectives it has set itself and most fundamentally make the District Carbon neutral by 2030.

It is therefore essential that the assessment of sites submitted through the Call for Sites process is undertaken in a positive and aspirational manner (NPPF para 16) and in accordance with NPPF paragraph 68 allows the identification of a sufficient level of deliverable and developable sites with sufficient flexibility to react to market trends and economic changes. The Green Belt constraints to the current delivery of housing should not be underestimated. It will be incredibly important for the local planning authority to release sufficient Green Belt land in sustainable locations, to ensure that this version of the Local Plan delivers the necessary housing to meet the District's need, over an albeit short plan period.

It is recognised that the Council are also working with their neighbours to produce the South West Herts joint strategic plan which will cover the plan period 2036 to 2050. Importantly, given the Inspectors comments in relation to infrastructure requirements, and in particular highway capacity issues around the previously proposed strategic developments, it is recommended that this would be the most appropriate vehicle to deliver properly planned strategic scale developments which can be fully supported with the necessary deliverable infrastructure, again planned at a strategic level.

Accordingly, the correct strategy for the emerging Local Plan 2020 – 2038 will be to reduce the reliance on strategic scale developments and instead include a significant and extensive range of small and medium-size sites. These can be deliverable in the first five years of the plan period or developable thereafter allowing sufficient lead time for more strategic sites to be properly planned and brought forward through the joint strategic plan with the necessary associated infrastructure.

Call for Sites Submission

Land North of Tippendell Lane Park Street, St Albans

The site comprises an area of approximately 5.6 hectares, and is a relatively flat site at 75 metres AOD. The site is located adjacent to residential areas, with residential development to the north, east and south, and agricultural land to the west. The District's main town centre of St Albans is located less than and 4km to the north.

Whilst the site creates a gap between Park Street to the north and How Wood to the south, in landscape terms it is well contained and not visually prominent in public views. The eastern boundary is formed by the Abbey railway which is on an elevated embankment where it crosses Park Street Lane beyond which is residential development. The urban edge of Park Street forms the northern boundary, beyond which there is an area of woodland to the north-west. The urban edge of How Wood meanders along the southern boundary from the railway bridge in the East turning North passed the junction with Penn Road. The only area where the site connects to arable land and the wider countryside is along its narrowing western boundary.

The context of the site itself is that of a suburban area where it might reasonably be expected to find development. The presence of the existing paddocks actually feels alien and out of character with the surrounding area. On the eastern side of the railway, Park Street itself already extends down as far as Park Street Lane and a similar extension on the western side of the railway would not be out of context. However, it would be important to maintain a suitable landscape edge along the northern side of Tippendell Lane to reinforce the distinction between Park Street and How Wood and provide a suitable transition as you travel westward beyond the site as the northern landscape opens out. It would also be important to introduce a strong planting belt along the western boundary which could extend from the northern woodland area, to provide a strengthened urban edge and transition to the countryside and Green Belt beyond.

The site is well connected to nearby towns and cities and is located just 0.5km south-west of Park Street Railway Station, from which a shuttle service operates between St Albans Abbey and Watford Junction (for onward connections to London Euston). Furthermore, the site is located adjacent to How Wood bus stop, where the W1 bus service runs a daily service to Watford, Croxey, Rickmansworth and Maple Cross. The site is also located in close proximity to the proposed new Strategic Rail Freight Terminal, which is being delivered by Helioslough and is located approximately 1 mile to the east of the site. While the site is location within the Green Belt, it has relatively few other constraints, it is not subject to any particular protective designations, in an area of flood risk and has the potential to be accessed from a number of locations.

The site would be developed to include an extensive area of public open space (approximately 1.67 ha) which can be considered to contribute towards compensatory environmental improvements to the Green Belt. In addition to public access, it could produce significant biodiversity net gains and also contribute to carbon offsetting. These are issues that the land owners are firmly committed to the delivery of, in the same way that they are committed to the delivery of high quality, inclusive, sustainable development.

Strategic Housing Land Availability Assessment

The site was previously considered under the SHLAA (2009) (Site ref. SHLAA-GB-PS-47). It was also considered as part of a wider site with the Park Street Sewage Treatment Works (Site ref. SHLAA-GB-PS-255). Under both assessments the site was not, at that time, deemed to be suitable for development. However, it is considered the assessments at the time were very generalised and actually not based on a thorough assessment of the original Call for Sites submissions.

In conclusion the site was (Site ref. SHLAA-GB-PS-47) rejected for the following reason:

"Development would affect land that is presently rural rather than urban in nature, would cause demonstrable harm to the character and amenity of surrounding areas, would be visually intrusive and result in encroachment into surrounding open countryside.

Development would also result in complete coalescence between Park Street and How Wood and could prevent the land from making a positive contribution to the Watling Chase Community Forest."

However, it should be noted that the SHLAA was not a full assessment of the sites performance against the purposes of the Green Belt set out in paragraph 134 of the NPPF and the only Green Belt assessment which had been undertaken was not sufficiently detailed or up-to-date to reach such a conclusion.

It is understood that the Council will be undertaking a new Housing and Economic Land Availability Assessment (HELAA) and it is essential that this process is sufficiently robust to ensure that the supporting information submitted with this Call for Sites submission is properly and fairly appraised, to determine the sites suitability. Importantly, the site is not the subject of any of the following designations or constraints:

> Area of flood risk; SSSI; Ancient Woodland; Local Nature Reserve; County Wildlife Site; Site of Geological Importance; Scheduled Ancient Monument; Ground contamination; Identified Site for Local Preservation (archaeological); Proximity of Locally Listed Building(s); Proximity of Listed Building(s); Historic Park or Garden; Air Quality Management Area; Conservation Area; Proximity to Hazardous Installations (as per Policy 84b); Public Right of Way; Utilities – e.g. electricity substations, pylons, telecom masts, underground pipelines, sewers etc; Identified Minerals and Waste Site; Adversely Affected by Noise, Air or other forms of pollution (e.g. major roads etc); Loss of high quality agricultural land (Grades 1,2 or 3a); A Protected Green Space; or Subject to Tree Preservation Orders.

Access can be gained with minimum alterations to the surrounding highway network from either the north or south as necessary and the previous assessment did not identify access as a potential issue.

The site is in one of the most sustainable locations in the District. It is located to the south of the town of St Albans, the District's main settlement, and a key focus for growth in the terms of the settlement hierarchy in any new Local Plan. The site lies between Park Street and How Wood, both second-tier settlements which are also closely related with Frogmore to the south-east and Chiswell Green to the north-west. Park Street railway station is approximately 0.4 km walking distance from the northern boundary of the site via Hawfield Gardens. The site is also well served by the local bus network.

It is therefore concluded that through the Council's new Housing Economic Land Availability Assessment (HELAA) the site must be identified as suitable and deliverable and therefore can make a positive contribution towards meeting the Council's acute housing needs.

Green Belt Assessment

In the original Green Belt Study, the site the subject of this representation, fell with parcel GB28. This was one of the smaller areas lying between St Albans and Park Street to the north and How Wood. It was not part of any of the eight strategic sub areas considered in more detail, although the site does lie to the east of the small scale sub area SA-SS6.

The Green Belt report described the area as predominantly arable farmland and commented as follows:

"The Parcel is located to the north of How Wood and south of St Albans. The boundary to the west follows the A405 and the east aligns with the railway line to the north of Park Street. The parcel is small at 83 ha in size and comprises an undulating chalk plateau which is flat to the south and rises gently to the northeast."

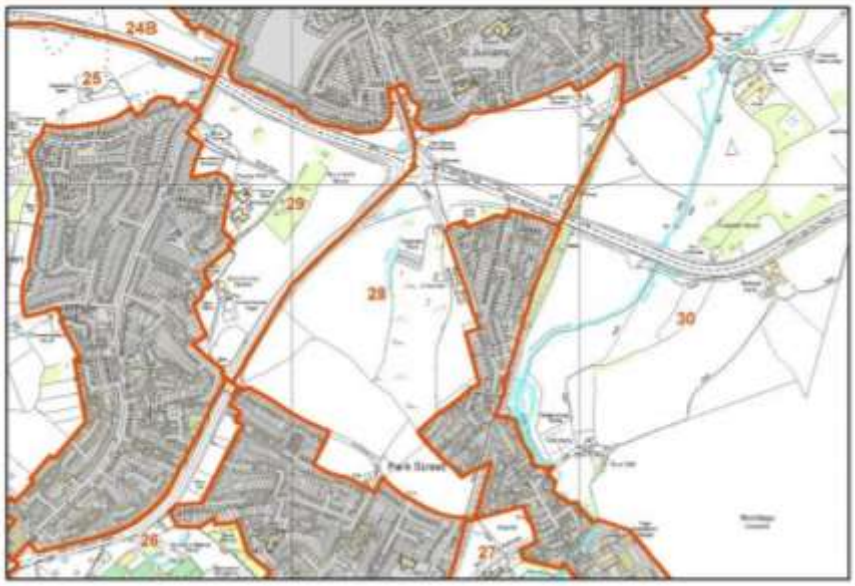

Figure 2: GB28 –Green Belt Land to North of How Wood
(Source: Green Belt Review Purposes Assessment – Parcel Assessment Sheets for St Albans City and District Council)

Overall, the report concluded that the area only (emphasis added) contributes significantly towards one (emphasis added) of the five purposes of the Green Belt.

The site was not considered further when the detail of the study was reviewed. It is our view that a more detailed assessment needs to be undertaken at a site specific level. This is particularly important in relation to this site as its development will provide the opportunity to strengthen the settlement edge and introduce some compensatory environmental benefits and improved public access without resulting in any significant harm to the overall function of the remaining Green Belt in this particular location.

When considered against the five purposes of the Green Belt set out at paragraph 134 of the NPPF, the site is not considered to make any significant contribution to the fundamental aim of Green Belt policy, which is to prevent urban sprawl, by keeping land permanently open. Considered on its own merits, the site would make a logical extension of the settlement, and while it currently it may physically provide some separation between Park Street and How Wood, the importance of this gap is considered to be marginal at best, especially when compared to the District's acute need to release land for housing. Furthermore, the distinction between the two settlements can be maintained by way of the inclusion of appropriate landscaping and ensuring that new development is high quality and distinctive in its own right. It will also provide an opportunity to strengthen the western urban edge and transition to the countryside and Green Belt. Compensatory environmental benefits, enhanced public access, biodiversity improvements and carbon capture can all be included. All these environmental, social and visual benefits would demonstrably outweigh any limited harm associated with the retention of the existing grazing use, and any limited associated economic benefits.

The assessment below considers the sites performance against each of the criteria set out at paragraph 134 of the NPPF having regard to the comments in the original Green Belt assessment:

a) To check the unrestricted sprawl of large built-up areas;

The parcel (GB28) is located away from the large built-up areas of London, Luton and Dunstable and Stevenage. It does not form a connection with a wider network of parcels to restrict sprawl. – It is considered that the site itself makes no contribution to this particular Green Belt function.

b) To prevent neighbouring towns merging into one another;

The parcel (GB28) does not fully separate neighbouring 1st tier settlements, however, it contributes (with GB26, 27, 29 &) to the strategic gap between St Albans and Watford (Abbots Langley) to the south of the study area. This gap is 4.8km and contains the settlements of Chiswell Green, How Wood, Bricket Wood, Park Street, Frogmore and Radlett Road. Therefore, any reduction in the gap would have a limited impact on the overall separation of 1st tier settlements in physical or visual terms but would have a significant impact on the separation between 1st and 2nd tier settlements and local levels of visual openness. - The removal of the submission site only would not have any impact on the wider role of this part of the Green Belt and as discussed above only has relevance to retaining a gap between Park Street and How Wood which is not considered to be a fundamental Green Belt function and accordingly the site is considered therefore to make a negligible contribution to the purposes of the Green Belt.

c) To assist in safeguarding the countryside from encroachment;

The parcel (GB28) displays some typical rural and countryside characteristics to the north in a mixture of arable fields bound by hedgerows and occasional hedgerow trees interspersed with some small blocks of woodland, whereas to the south pasture fields are enclosed with fencing. In spite of this, urban influences are strong through the proximity of settlement edges and A414 and A405 which run through the parcel. These are concealed by the general landscape and tree / hedgerow cover in some areas but are audibly intrusive. Settlement boundaries enclose the majority of the parcel reinforcing urban fringe characteristics. Levels of visual openness are variable and generally contained. - The site itself is contained by strong urban influences on all three sides, it is only the narrower western edge which connects to the wider countryside with a more open characteristic. If anything the inclusion of the site within the Green Belt forms more of an encroachment into the surrounding urban area and it is therefore considered that the site makes no or negligible contribution to this particular function.

d) To preserve the setting and special character of historic towns; and

The parcel (GB28) does not provide setting for any historic places. - The site itself is well contained and as set out above makes at best a negligible contribution to the wider parcel and has absolutely no relationship with any historic places, accordingly it makes no contribution to this particular Green Belt purpose.

e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

While the development of this particular site may do little to encourage urban regeneration, there is a firmly established need for the release of Green Belt sites to meet the District's acute housing crisis.

As set out above, when the site is considered against the five purposes of the Green Belt, demonstrably it makes negligible if any contribution to the fundamental purposes of the Green Belt. The only issue associated with the development of this particular site would be to ensure that the development is designed and laid out in a manner which allows there to be the retention of a degree of distinction between the areas of Park Street and How Wood. As previously discussed, this is a matter which could be incorporated into a suitable landscape led masterplan. Visually, such a scheme would ensure that the sites development retains the sense of place for both Park Street

and How Wood whilst facilitating housing development in a sustainable location. There is an established essential need to identify suitable Green Belt opportunities to meet the Council's acute housing needs and it is considered that this is a suitable site, in a location where the Green Belt performs a very limited, if any function. The associated benefits of an expansive open space coupled with market and affordable housing delivery, should be considered sufficient evidence and justification to demonstrate the exceptional circumstances necessary for the site to be released from the Green Belt.

Summary

The allocation of this site and its subsequent development could bring significant positive social, economic and environmental benefits. It can provide a site for much needed market and affordable housing, significant public open space, reinforce the urban edge and integrate development into the local context with negligible impact on views from the wider countryside and surroundings. It will also assist the Council in meeting their objectively assessed housing needs and acute demand for both market and affordable housing.

The site is under the control of a single landowner, in a sustainable location with good access to public transport on the edge of Park Street and close St Albans, the District's largest settlement. With the potential of a new rail freight interchange the area will be a key focus for growth in any new Local Plan. The site is only 0.4km from Park Street railway station and well connected to the existing public transport network.

As set out above, the loss of this small portion of the sub area of already marginal Green Belt would not have any significant negative impacts on the overall role of the Green Belt in this particular location. Considered in the context of the surrounding land uses, the site is a logical continuation of the edge of the settlement, well contained within the existing urban area where defensible boundaries are already established. The District's acute need for housing along with the economic, social and environmental benefits are clear justification for the exceptional circumstances required to bring the site forward as an allocation in the new Local Plan 2020 – 2038.

For the reasons set out above we would request that the Council gives serious consideration to the development opportunities this particular site has to offer. It would be a sound allocation that is fully justified in planning terms.

Should you have any questions about this submission or like to discuss it, or the site in more detail, please do not hesitate to contact me. The landowners would be happy to provide further information to assist with deliverability and work with the Council to produce a detailed development brief for the site.

Yours faithfully

[redacted]

Encs.

Your interest . Planning Consultant

Site address/location (Please provide a map showing the site boundary)

Land in and Around Former Aerodrome Site, North Orbital Road, Upper Colne Valley, St Albans, Hertfordshire.

Site area (in hectares)

The site covers eight separate parcels of land (Areas 1 to 8) with a total area of 419 hectares.

Easting

515611

Northing

203479

Site Location Plan Attached Yes

Upload Site Location

Site Location Plan (2)
Site Location Plan

GIS mapping shapefile attached (in .shp file format) No

Land ownership (please include contact details if known)

Hertfordshire County Council, Gorhambury Estate, Tarmac.

Current land use

Land within Area 1 was used for the Former Radlett Aerodrome which extends from the Midland Mainline Railway at its eastern boundary to the edge of the settlement of Frogmore in the west. Use of this land as an airfield ended in 1970 following which the southern half was quarried for gravel from 1992 to 1997.
The predominant use of the former runway area is now low grade agricultural/grazing.
The remaining parcels of the site outside Area 1 are mainly in agricultural use.

Condition of current use (e.g. vacant, derelict)

In agricultural use.

Suggested land use Other (please specify)

Strategic Rail Freight Interchange (SRFI) comprising intermodal terminal and road and rail served distribution units within Area 1, with associated road, rail and other infrastructure facilities and works within Areas 1 and 2 (including a Park Street/ Frogmore relief road) and associated landscaping and further landscaping and other works within Areas 3 to 8 inclusive to provide public open land and a community forest. In more detail, the proposed land use is as follows:
Area 1: SRFI and the creation of a visitor information centre in the vicinity of Hedges Farm, landscape, and a conservation grazing regime to manage grassland and to enhance habitats.
Area 2: Associated road rail and other infrastructure facilities. Mitigation area for Great Crested Newts and reptiles, mitigation area for grassland habitat and provision of other species rich habitats.
Area 3: Managed conservation grazing and cutting regime to enhance Ver Valley Meadows Local Wildlife Sites, manage the watercourse vegetation for increased biodiversity and nature enhancements and screen planting to the A412 and new east – west connectivity for PROW.
Area 4: New footpath with potential to provide link along Ver Valley Walk, management and structured conservation grazing and cutting regime with mixed livestock to enhance habitat and local wildlife.
Area 5: Creation, enhancement, and management of ground nesting bird habitat, manage existing woodland, provision of accessible informal recreation space and routes providing trim trails, managed/conservation grazing regime.
Area 6: Managed grazing and cutting regimes to enhance Moor Mill South Local Wildlife site.
Area 7: Managed grazing and cutting regimes to enhance Local Wildlife site.
Area 8: Creation, enhancement and management of ground nesting and wetland bird habitats, structured conservation grazing and cutting regime to manage the grassland and enhance habitats

Reasons for suggested development / land use

Planning permission has been granted and development has commenced onsite, which demonstrates the commitment in delivering the development (see planning status section below).
It is important to reiterate that the implementation of the SRFI at Radlett enables the diversion of freight from road to rail and plays a vital role in achieving the Government's commitment to sustainable development The transfer of freight from road to rail (modal shift) has a vital role to play in a low carbon economy and helps to address climate change thus contributing to the Government's economic, strategic and environmental objectives.
The Planning Inspectors who held the 2020 SADC Local Plan Review EIP identified the SRFI as a strategic priority for the district as it delivers an important piece of national infrastructure, and thus should be accommodated.
In addition, the development will provide a Park Street/ Frogmore relief road, a publicly accessible country park which will provide a range of benefits including enhanced facilities for bird watching, fishing, horse related activities and informal recreational facilities, environmental improvements within Park Street, improvements to 4 junctions in the surrounding strategic road network, improvements to Park Street station and the Abbey branch line, and improvements to the local footpath network.

Likely timescale for delivery of suggested development / land use	6-10 Years
Contamination/pollution issues (previous hazardous land uses)	No
Environmental issues (e.g. Tree Presentation Orders; SSSIs)	No
Flood Risk	No
Utility Services (access to mains electricity, gas, water, drainage ect.)	No

Legal issues (For example, restrictive covenants or ownership titles affecting the site) No

Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site? Yes

Other constraints affecting the site No

Planning Status

. Planning Permission Granted

Please include details of the above choice below (for example planning reference numbers and site history)

Planning permission was granted by the Secretary of State on 14th July 2014, ref: 5/2009/0708. The planning permission was for, “Construction of a Strategic Rail Freight Interchange (SRFI) comprising an intermodal terminal and rail and road served distribution units (331,665m2 in Use Class B8 including ancillary B1/B2 floorspace) within Area 1, with associated road, rail and other infrastructure facilities and works within Areas 1 and 2 (the Development Site), (including earth mounds and a Park Street/Frogmore relief road) in a landscaped setting, and further landscaping and other works within Areas 3 to 8 inclusive to provide publicly accessible open land and community forest”.
This planning permission was subject to a number of pre-commencement conditions which have all been discharged (reference numbers can be provided upon request). Work will shortly commence on preparing applications to discharge all of the pre-occupation conditions.
Reserved matters applications have been submitted and approved for the whole of the development site ref: 5/16/3006 (i.e. buildings, intermodal, car parks and internal roads), landscaping ref 5/17/1995 (those specified in condition 15 of the OPP), and infrastructure works ref 5/17/1938 (i.e. the bypass, northern gateway, southern access and rail chord).
The Landscape reserved matters approval was also subject to a number of pre-commencement conditions which were discharged prior to the works being carried out (reference numbers can be provided upon request).
The planning permission was also subject to a condition requiring the development to be commenced either before the expiration of five years from the date of the permission or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later. The last of the reserved matters was approved on 16th May 2018 meaning the development must be commenced before 16th May 2020. Works have been carried out in accordance with the planning permission following the discharge of the pre-commencement conditions and prior to the 16th May 2020.
The Planning Inspectors who held the 2020 SADC Local Plan Review EIP identified the SRFI as a strategic priority for the district as it delivers an important piece of national infrastructure, and thus should be accommodated.

Other comments

Helioslough expects to acquire all of the required land, through negotiation with the three landowners. It has an exclusive option with one of the landowners over the northern access land.
HCC has been repeatedly advised by its own Queen’s Counsel that it would have no legal choice but to sell for the development of the SRFI. Helioslough has recently sought to update all three landowners on the progress of the project and has conveyed that it has aspirations to acquire the land as soon as possible.
In relation to site constraints, all issues have been addressed and resolved through the planning application process. Earthmoving works will be required to level parts of Area 1, and for the construction of an acoustic bund around the SRFI. Area 1 is also crossed by a major oil-pipeline, but the approved design for the SRFI makes provision for a limited diversion of the pipeline within the site.
Any contamination issues which are relevant to the site have been addressed through the conditions

which have been applied to the planning permission to ensure that suitable mitigation measures are implemented.
We envisage that the entire scheme will be completed within a 10 year period from March 2021.
This submission has been made to update the information on the site provided in previous submissions.

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LEGEND

- Strategic Rail Freight Interchange Site Boundary
- Country Park Boundary
- (6) Land Parcel

0 100 250 500 1000 metres

NORTH

Rev	Date	By	Notes

Client

Helioslough Ltd

Project

Former Aerodrome Site, North Orbital

Drawing Title

Location Plan

Drawing Status

For Planning

Scale	Date	Drawn
1:25 000@A3	Dec'08	JG
Drawing No	**Checked**	**Approved**
394503-DSD-001	DG	RMK

CAPITA LOVEJOY

land planning by design

Capita Lovejoy
Level Seven, 52 Grosvenor Gardens,
Belgravia, London SW1W 0AU
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enquiries@lovejoylondon.uk.com
www.capitalovejoy.co.uk
LONDON BIRMINGHAM

St Albans City & District Council

HELAA Reference (Internal use only)|

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

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

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

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

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

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

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

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

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

Please do not submit sites that:

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

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).

- Already have planning permission for development, unless a new and different proposal is likely in the future; or

- Are situated outside St Albans City and District's administrative area.

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

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

By online consultation portal:

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

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

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

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

Your Details	
Name	Matthew Gray
Company/Organisation	Asbri Planning Ltd
Address	Suite D, 1st Floor, 220 High Street, Swansea
Postcode	SA1 1NW
Telephone	
Email	
Your interest	☐Site Owner ✓Planning Consultant ☐Registered Social Landlord ☐Local Resident ☐Developer ☐Community ☐Other

Site Details

Requirements:

- Delivers 5 or more dwellings or; ✓
- Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) ✓

Site address/location (Please provide a map showing the site boundary)	Land North of 5 Acres and South of the M25, Bricket Wood, St Albans			
Site area (in hectares)	2.6			
Coordinates	Easting	512812	Northing	202851
Site Location Plan Attached	✓Yes ☐No			
GIS mapping shapefile attached (in .shp file format)	☐Yes ✓No			
Landownership (please include contact details if known)	Ms E Priestland and Ms E Pearson C/O EG Group			
Current land use	Rough scrub formerly arable fields			
Condition of current use (e.g. vacant, derelict)	Vacant			
Suggested land use	☐Housing ☐ Gypsy & Travellers ✓ Mixed Use (please specify) ✓Employment ☐ Renewable and low carbon energy and heat ☐ Biodiversity Improvement / Offsetting ☐ Green Belt Compensatory Land ☐ Land for Tree Planting ✓ Other (please specify) Road user services, hotel and community uses			
Reasons for suggested development / land use	Need for road user services / hotel / B2 / B8 uses.			

Likely timescale for delivery of suggested development / land use	✓ 1-5 Years ☐ 6-10 Years ☐ 11-15 Years ☐ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes ✓ No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes ✓ No
	Flood Risk	☐ Yes ✓ No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes ✓ No (Steep bank along M25)
	Utility Services (access to mains electricity, gas, water, drainage etc.)	✓ Yes ☐ No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	☐ Yes ✓ No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	✓ Yes ☐ 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	✓☐ Yes (If yes, please specify) Within Green Belt
Planning Status	☐ Planning Permission Granted ✓ Planning Permission Refused ☐ Pending Decision ✓ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice ☐ Planning Permission Not Sought ☐ Other	
	Please include details of the above choice below (for example planning reference numbers and site history) 5/2008/0703 Erection of barn for storage of agricultural machinery. Refusal on 10/06/2008 5/2001/2041 Erection of a 250-bedroom hotel with conference facility and staff accommodation (outline). The application was withdrawn.	
Other comments	Please see accompanying Supporting Statement where reference will be made to previous Planning Policy Committees where it has been established that to meet development requirements consideration will need to be given to releasing land from the Green Belt, particularly where causing 'least damage', and where there may be unique contributions to enhancing local high-quality job opportunities.	

SITE LOCATION PLAN
OLD WATFORD ROAD, JUNCTION 21A, M25

0m 25m 50m 75m 100m 125m 150m 175m 200m

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Scale: 1:2500, paper size: A4

Ordnance Survey Licensed Mapping

emapsite™ plans

Prepared by: Kate Stevens, 03-03-2021

issue:

A: original issue

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boundary areas

area edged blue (approx): 6.35 acres

schedule

PFS with HGV fuel
Drive Thru coffee
Drive thru restaurant

Ground plus 4 storey , 150 bed hotel
Unit 2 - 15,000sqft unit B8/B2
Unit 3 - 4 terrace units 2500sqft each total 10,000sqft

Total B2/B8 - 63,000sqft

campbelldriverpartnership architects

client: EG Group Ltd

project: site development

old watford road junction 21A M25

sheet: proposed site layout

job no:	dwg no:	
18.137	001	I

scale: 1:500 @ A1

date:

drawn:

capricorn park
blakewater road
blackburn bb1 5qr
t:
e:

St Albans Housing and Economic Land Availability Assessment 2021

Call for Sites on behalf of EG Group

Land North of Five Acres and South of the M25, Bricket Wood, St Albans

March 2021

Section 1
Introduction

Section 2
Site Description and Background

Section 3
Characteristics and Constraints

Section 4
Proposal and Deliverability

Section
Conclusions

Appendices

A Site Location
B Call for Sites Form
C Site Development Plan

Introduction

1.1 This submission document has been prepared in order to accompany the forms completed in response to the current St Albans City and District Council Housing and Economic Land Availability (HELAA) 2021 Call for Sites exercise on behalf of EG Group. It relates to land North of Five Acres and South of the M25, Bricket Wood, St Albans.

1.2 The Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' represents an opportunity to suggest sites within the District for development over the next 15-20 years and will be used to inform the preparation of the forthcoming Local Plan.

1.3 The site in question was previously promoted for residential led development, including via the District Local Plan, Green Belt Review 2003, and SHLAA exercises. The current submission is for a mix of uses which include B2 & B8 employment uses, roadside services and a hotel. It is contended that earlier reasons for resisting the proposals on the grounds of retaining an 'open gap' are no longer valid or reasonable.

1.4 In responding to the Call for Sites, additional information is provided in this document which elaborates on that requested in the form. It also seeks to confirm that the site can be delivered for the combination of uses proposed in a sustainable manner. The following sections seek to reflect those general headings in the Call for Sites form.

Site Description and Background

Site Description

2.1 The site subject to these representations is located in the north western part of the settlement of Bricket Wood. It is some 2.6 hectares in area and irregular in shape. It forms a wedge of unused, vacant land which lies east of the A405 North Orbital Road and south of the M25. The routes converge at Junction 21A directly to the north.

2.2 A landscaping buffer separates the site from existing residential properties located to the south of the site which front onto Oakwood Road.

2.3 The site is undulating in nature with its highest point in the northern part. A steep embankment runs from here along the M25. An agricultural access gate lies off a layby on the A405. Near here there is evidence of unauthorised tipping on the land. A public footpath runs diagonally to the north of the site between Junction 21A and Garnett Drive. Overhead power lines are located to the north and East of the site.

2.4 Whilst it is understood that the site was arable land, there is no current evidence of agricultural activities and the site mainly comprises rough scrubland.

2.5 A strong belt of trees run along the A405 boundary. The site is barely visible from the M25 due to the steep bank. In addition, is it not visible from the adjacent residential streets as there is no open frontage to the nearby residential streets.

Planning Background

2.6 Previously the site had been promoted through earlier SHLAA call for sites exercises. The corresponding reference was SHLAA/GB/ BW/ 89. It was rejected for the following reason:

'Development of the site would affect land that is presently rural rather than urban in nature and would result in encroachment and visual intrusion into open countryside. This large, open site provides a gap, which serves as an important buffer between Bricket Wood and the M25 (and prevents coalescence between Bricket Wood and How Wood). Development would create further pressure on land to the east/ south of the M25.'

2.7 The site was considered at the 1992 Public Inquiry into the District Local Plan (Inspector's Report 1993) where the Inspector commented: –

"I believe that the land does contribute to the purposes of the Green Belt. Furthermore, I consider that it is sufficiently extensive to be of some value to the existing farm holding and believe that farm machinery can gain reasonable access to it from the A405".

2.8 The site was also considered at the 2003 Green Belt Review when it was stated that *'Gaps between built up areas south of St Albans fulfil an important role in preventing coalescence between St Albans and Watford. In some areas these gaps are extremely small, and this is one such case. Travelling along Watford Road between St Albans and Chiswell Green (particularly northwards) the two settlements appear visually to have almost completely coalesced. However, brief glimpses of more open countryside remain (including to the site in question), as well as the physical and to a limited extent visual barrier of the M10. It is of paramount importance that what little openness and visual separation that still exists is protected.'*

Planning History

2.9 5/2008/0703 - Erection of barn for storage of agricultural machinery. Refusal on 10/06/2008

5/2001/2041 - Erection of a 250-bedroom hotel with conference facility and staff accommodation (outline). The application was withdrawn.

Characteristics and Constraints

3.1 This Section, considers the suitability of the site and assesses the appropriateness of the site as a future mixed-use allocation, particularly in the context of its Green Belt status.

3.2 As stated in Section 2 of these representations, it is apparent that the site has no major constraints which would otherwise prevent development from taking place. This has been confirmed by previous site assessment exercises. The major issue therefore relates to its inclusion within the Metropolitan Green Belt, and its perceived value to the designation. For this reason, it has previously been rejected as a housing land allocation.

3.3 The current proposals, however, as included in this submission, relate to a mixed-use form of development, which is led by road user services, accessible via the A405, which would create a suitable access to employment generating B2 and B8 uses. A buffer zone can be created between the housing and noise generating sources, including the employment uses and the M25. A hotel is also suggested linked to market demand, in addition to the safeguarding of some open land. The proposals would have no impact on the adjacent right of way.

3.4 At the St Albans City and District Planning Policy Committee meeting of 22nd May 2018, which followed the earlier Call for Sites it was stated that:

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

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

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

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

3 - Unique contribution to other infrastructure provision or community benefits

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

3.5 The site, at 2.6 hectares falls below the Council's threshold of 11 hectares for a 'strategic scale site'. Hence the 8 sites referred to in the above extracts. Notwithstanding, its position adjacent to a major road interchange confirms it as benefitting from a strategic location. Below we seek to compare the sites against the Council's Red Amber Green (RAG) system under the headings associated with each stage of the selection process.

3.6 ***Stage 1***

1. ***Green Belt Review***

In order to meet development requirements consideration will need to be given to releasing land from the Green Belt - particularly those locations identified as causing 'least damage' to Green Belt purposes. The site in question is no longer in agricultural use, is not visible from the wider area and is affected by unauthorised tipping activities. The gap associated with it has been described as 'extremely small' in previous assessments and is no longer required to fulfil the purposes of the designation. The Green Belt allocation is historical and precedes the construction of the M25 which has eroded the previous open character of the area. It is therefore clear that the context and setting which formed part of the original allocation of the site is materially and significantly altered when compared with the most up to date position.

3.7 ***Stage 2***

2. ***Suitability***
3. ***Availability***

The site is suitable in locational terms for the combination of uses proposed, and is available due to the agreement with the landowners. EG Group have a market leading track record of delivering sustainable schemes as described in the following Section.

3.8 ***Stage 3***

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

3.9 4. The proposals, as well as providing community benefits, would deliver new access arrangements which would allow public transport services into the site.

Provision of appropriate car parking would also encourage car sharing initiatives.

3.10 5. The provision of B2 and B8 uses would represent high quality job opportunities at an attractive location with good access to the strategic road network, particularly for the growing distribution sector and the UK economy and infrastructure transitions post Brexit.

3.11 6. As well as the new access, the neighbouring public footpath would be upgraded as part of any proposed development, creating a sustainable route for use by local residents to access the proposed uses. Open land would be safeguarded along the embankment adjacent to the M25.

3.12 The next section, in outlining EG Group ethos and track record, demonstrates the extent to which the proposals are deliverable and achievable.

3.13 In terms of the overall evaluation, it is clear that the site meets the criteria for releasing land from the Green Belt to provide a unique contribution for high quality job opportunities. The development would also be in accord with the Housing White Paper which suggests that local authorities should look first at using Green Belt land which surrounds transport hubs. It is clear the subject site would meet such a criteria.

Proposal and Deliverability

4.1 It has been established that there are no known constraints which would prevent the development within the next 5 years if it were accepted as a potential mixed-use allocation for roadside uses, B2 and B8 uses and hotel use in the new local plan.

4.2 Based in Blackburn, EG Group was founded in 2001 by brothers Mohsin and Zuber Issa with the acquisition of a single petrol filling station in Bury, Greater Manchester. In October 2017 the company rebranded its Europe Wide operations to the EG Group since establishing itself as one of Europe's fastest growing and most recognisable forecourt operators, with an expanding portfolio of 400 freehold-owned petrol stations located throughout mainland UK and a large number of separate roadside welfare facilities (roadside restaurants and motorway service areas). The company operates approximately 2,500 sites across Europe (including the UK) and employs approximately 12,500 people.

4.3 Alongside an innovative approach to roadside retail property, EG Group has forged high-profile relationships with nationally and globally recognised retail and convenience brands, now operating in excess of 142 Starbucks drive-to and drive-thru restaurants, 161 KFC restaurants, 12 Burger Kings, 153 Subway sub-stations, 4 Sbarro, 2 Cinnabon and 190 Greggs bakeries. EG Group is the largest franchisee for Subway in Europe.

4.4 The company's vision is to collaboratively engage and work with leading retail brand partners to be able to deliver a world class fuel, convenience, food and drink offer that exceeds the expectations of the modern consumer.

4.5 The company promotes the following values and business ethos:

- Market awareness with active responsiveness to convenience consumer trends and demands.
- Delivering value and results consistently to shareholders, stakeholders and partners.
- Commitment to on-going infrastructure and people investment to build a sustainable business model.
- Supporting local communities with a view to empowering individuals to grow, contribute and succeed.

4.6 EG Group make sustainability a key consideration. To that end, in 2014 they invested £2.6m in providing solar panels for over 20% of the EG sites. In May 2017, it was announced that they would be providing an additional £6m into reducing their carbon footprint. Additionally, six motorway service stations feature rain water harvesting systems, collecting rain water which is then filtered to be used on site.

4.7 In 2014, EG Group invested £3.2m in the installation of LED lighting on sites throughout the estate. As well as consuming less energy than incandescent

and high-intensity discharge (HID) lights, LED lights use only 2-17 watts of electricity, which is 25%-80% less energy than standard lighting systems, decreasing cost and impact significantly.

Petrol Stations Within the UK

4.8 Since 2001, 60% of independent forecourts have closed (4,000 sites) (Source: http://www.ukpra.co.uk/_assets/PRA_MarketReview2016.pdf page 4). EG Group are going against this trend by providing a new roadside offer to compliment fuel sales.

4.9 This includes providing additional facilities for passing motorists badged as 'Food to Go' which form a vital element of the business operation and a key element of ensuring the viability of sites.

Sustainability

4.10 As a responsible developer, EG Group have investigated and implemented a series of core sustainable design principles within our project design, delivery and operation that align with a number of the UN Sustainable Development Goals (2015). The company typically operate Energy strategies that include a proportion of renewable energy through Solar PV and high efficiency Air Source Heat Pumps, we also promote passive design solutions encouraging increased efficiency throughout the building envelope, minimising air leakage and heat loss. Our developments also reduce potable water consumption through high quality water saving technologies within WC and Shower areas, where possible looking for opportunities to recycle / reuse water.

4.11 Environmental impact is further reduced on each of their sites with extensive landscaping promoting an increase in Biodiversity and Ecological habitats, we adopt detailed surface water drainage strategies that extensively provide improvement to run off rates and surface water pollution management through SUDS technology.

4.11 As a central part of their BREEAM and sustainability design response EG Group operate a Sustainable Material Procurement policy, this aims to influence design decisions in the specification of materials that are appropriate to the design and operation of the development considering; life cycle, maintenance, end of use, environmental management systems, responsible and local sourcing opportunities and capital cost. Our Sustainable Material Procurement policy also extends to the construction phase, establishing supply chain and local resource and training opportunities alongside material product certification and ISO accreditation.

Conclusions

5.1 This supporting statement seeks to elaborate on information submitted on the required forms as part of the current St Albans Housing and Economic Land Availability (HELAA) 2021 Call for Sites exercise on behalf of EG Group. It promotes the release of land North of Five Acres and South of the M25, Bricket Wood, St Albans for a mixed-use development.

5.2 The mix would include B2 & B8 employment uses, roadside services and hotel uses.

5.3 It has been established in earlier Council Planning Policy Committees that in order to meet development requirements consideration will need to be given to releasing land from the Green Belt, particularly where causing 'least damage', and where there may be unique contributions to enhancing local high-quality job opportunities.

5.4 These representations establish that the site meets the relevant criteria in so far as it is no longer in agricultural use and is affected by unauthorised tipping activities. Its lack of visibility from the wider area confirms that it is no longer perceived as an open gap or important buffer. The allocation of the site as within the Green Belt was prior to the building of the M25 which has materially, significantly aqnd permanently altered the surrounding area and the wider context within which it is sited.

5.5 In conclusion, EG Group wish to see the site emerging favourably through the assessment process as a mixed-use land allocation, which is deliverable in the shorter term and lies in a sustainable location.

Appendix A
Site Location Plan

SITE LOCATION PLAN
OLD WATFORD ROAD, JUNCTION 21A, M25

0m 25m 50m 75m 100m 125m 150m 175m 200m

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Scale: 1:2500, paper size: A4

Ordnance Survey Licensed Mapping

emapsite™ plans

Prepared by: Kate Stevens, 03-03-2021

Appendix B
Call for Sites Form

St Albans City & District Council

HELAA Reference (Internal use only)|

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.

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

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

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

Please do not submit sites that:

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

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).

- Already have planning permission for development, unless a new and different proposal is likely in the future; or

- Are situated outside St Albans City and District's administrative area.

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

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

By online consultation portal:

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

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

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

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

Your Details	
Name	Matthew Gray
Company/Organisation	Asbri Planning Ltd
Address	Suite D, 1st Floor, 220 High Street, Swansea
Postcode	SA1 1NW
Telephone	
Email	
Your interest	☐Site Owner ✓Planning Consultant ☐Registered Social Landlord ☐Local Resident ☐Developer ☐Community ☐Other

Site Details

Requirements:

- Delivers 5 or more dwellings or; ✓
- Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) ✓

Site address/location (Please provide a map showing the site boundary)	Land North of 5 Acres and South of the M25, Bricket Wood, St Albans			
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Coordinates	Easting	512812	Northing	202851
Site Location Plan Attached	✓Yes ☐No			
GIS mapping shapefile attached (in .shp file format)	☐Yes ✓No			
Landownership (please include contact details if known)	Ms E Priestland and Ms E Pearson C/O EG Group			
Current land use	Rough scrub formerly arable fields			
Condition of current use (e.g. vacant, derelict)	Vacant			
Suggested land use	☐Housing ☐ Gypsy & Travellers ✓ Mixed Use (please specify) ✓Employment ☐ Renewable and low carbon energy and heat ☐ Biodiversity Improvement / Offsetting ☐ Green Belt Compensatory Land ☐ Land for Tree Planting ✓ Other (please specify) Road user services, hotel and community uses			
Reasons for suggested development / land use	Need for road user services / hotel / B2 / B8 uses.			

Likely timescale for delivery of suggested development / land use	✓ 1-5 Years ☐ 6-10 Years ☐ 11-15 Years ☐ 15+ Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	☐ Yes ✓ No
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	☐ Yes ✓ No
	Flood Risk	☐ Yes ✓ No
	Topography affecting site (land levels, slopes, ground conditions)	☐ Yes ✓ No (Steep bank along M25)
	Utility Services (access to mains electricity, gas, water, drainage etc.)	✓ Yes ☐ No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	☐ Yes ✓ No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	✓ Yes ☐ 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	✓☐ Yes (If yes, please specify) Within Green Belt
Planning Status	☐ Planning Permission Granted ✓ Planning Permission Refused ☐ Pending Decision ✓ Application Withdrawn ☐ Planning Permission Lapsed ☐ Pre-Application Advice ☐ Planning Permission Not Sought ☐ Other	
	Please include details of the above choice below (for example planning reference numbers and site history) 5/2008/0703 Erection of barn for storage of agricultural machinery. Refusal on 10/06/2008 5/2001/2041 Erection of a 250-bedroom hotel with conference facility and staff accommodation (outline). The application was withdrawn.	
Other comments	Please see accompanying Supporting Statement where reference will be made to previous Planning Policy Committees where it has been established that to meet development requirements consideration will need to be given to releasing land from the Green Belt, particularly where causing 'least damage', and where there may be unique contributions to enhancing local high-quality job opportunities.	

Appendix C
Site Development Plan

issue:

A: original issue

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boundary areas

area edged blue (approx): 6.35 acres

schedule

PFS with HGV fuel
Drive Thru coffee
Drive thru restaurant

Ground plus 4 storey , 150 bed hotel
Unit 2 - 15,000sqft unit B8/B2
Unit 3 - 4 terrace units 2500sqft each total 10,000sqft

Total B2/B8 - 63,000sqft

campbelldriverpartnership architects

client: EG Group Ltd

project: site development

old watford road junction 21A M25

sheet: proposed site layout

job no:	dwg no:	
18.137	001	I

scale: 1:500 @ A1

date:

drawn:

capricorn park
blakewater road
blackburn bb1 5qr
t:
e:

St Albans City & District Council

HELAA Reference (Internal use only)|

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

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

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

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

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

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

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

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

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

Please do not submit sites that:

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

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).

- Already have planning permission for development, unless a new and different proposal is likely in the future; or

- Are situated outside St Albans City and District's administrative area.

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

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

By online consultation portal:

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

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

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

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

Your Details	
Name	Brian Parker (The Agent)
Company/Organisation	McPartland Planning Limited
Address	10 Orient Close, St Albans
Postcode	AL1 1AJ
Telephone	
Email	
Your interest	☐Planning Consultant

Site Details

Requirements:

- Delivers 5 or more dwellings or;
- Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)

Site address/location (Please provide a map showing the site boundary)	Attached			
Site area (in hectares)	c.14.5			
Coordinates	Easting	512835	Northing	204671
Site Location Plan Attached	☐Yes - Attached			
GIS mapping shapefile attached (in .shp file format)	☐No			
Landownership (please include contact details if known)	Virginia Properties c/o The Agent McPartland Planning Ltd 10 Orient Close St Albans AL1 1AJ			
Current land use	Former polo field, grazing and paddocks			
Condition of current use (e.g. vacant, derelict)	Largely vacant: agricultural barn and stables on grazing land and paddocks			
Suggested land use	☐ Housing ☐ Mixed Use (please specify) ☐ Biodiversity Improvement ☐ Other (please specify) Mixed/other use - Community facilities - tba			
Reasons for suggested development / land use	Housing crisis			