

Ecological Appraisal (Cherryfield Ecology)



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Report prepared for: Shane Aherne

For the Site of: Land lying to the south east of Burydell Lane, Park Street, St. Albans
AL2 2PQ

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Cherryfield Ecology has prepared this report for the named clients use only.

Ecological reports are limited in shelf life, Natural England usually expect reports for licences to be no more than 12 months old and therefore should the project not proceed within 12 months of this report an updated survey should be undertaken in order to check for changes that may have occurred on site. Information is believed to be accurate at the time of survey; recommendations are made without bias based on good practice guidelines within the industry. However, species presence and ecological parameters can change over time.

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Bat license level 1

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Ecological Appraisal (EA)

0.0 Non-Technical Summary

0.1 Background

This report follows national guidelines JNCC (2010) allowing for a day-time inspection and recommends for further surveys, if considered necessary. If a deviation from the guidelines has been made, this will be detailed in the Method Section.

The following report details the findings and recommendations for the site of land lying to the south east of Burydell Lane, Park Street, St. Albans AL2 2PQ.

The client commissioned Cherryfield Ecology to undertake an EA as the proposals include for the development of the site for residential usage.

0.2 Results and Findings

- The site consists of scattered trees, woodland, bare ground, small patches of improved grassland, ephemeral vegetation, and tall ruderal vegetation.
- No protected species were found on site at the time of the survey.
- Potential badger sett entrances (x3) were found in the woodland to the south of the site. These were clear of debris and with clear pathways around them. This provides a **high** potential for badger to be using the site.
- The site has potential to support common reptiles due to the mosaic of habitats found across the site. This mixture of habitats and also a large amount of deadwood, debris and salvaged materials found across the site provides a **high** potential common reptile to be using the site.
- There are two trees found on site which provides a **high** potential for roosting bats due to the presence of suitable roosting features and access points across the two trees.

- The scattered trees and woodland habitats provide **high** potential for breeding birds. A number of birds species were seen and heard whilst on site and there were also disused bird nests and bird boxes on site.
- The River Ver is found bordering the site to the western boundary.

0.3 Impact Assessment and Recommendations

Badger - **Full survey** will be required to ascertain if badgers are still using the site.

Once the full surveys have been completed, mitigation measures can then be put into place, if required.

Bats -**Presence/likely absence surveys** will be required (three surveys, at least two weeks apart for both trees), with two surveyors to cover the mature apple tree and two surveyors to cover the willow; two of these surveys must be undertaken between May to August.

Breeding Birds - No further surveys are recommended; however, the development should take place outside the nesting season (March to August). If this is not possible, it is recommended that a qualified ecologist is on site to ensure the trees found on site are not occupied by breeding birds, prior to demolition. Should an occupied nest be found, a buffer zone would need to be created until the nest is no longer in use.

GCN - No further survey is necessary.

Reptiles - **Presence/ likely absence surveys** for reptiles would be required to establish if any species are using the site. These will be done between the months of March and October. Bitumen tiles will be placed across the site in week one and will then be checked once a week over a seven-week period, in suitable weather (9°C to 18°C, no rain, little winds and sunny).

River Ver - It is recommended to erect screening barriers during works to minimize any potential impact to the River Ver to the west of the site. See section 4 for details.

The findings outlined in this report are valid for one year, after which updated surveys will be required.

1.0 Introduction

1.1 Aim

The aim of this report is to inform of ecological constraints that may affect the development proposals and recommend to the client if further surveys are required for protected species. An impact assessment is undertaken at this stage; however, if further surveys are required, additional and unexpected impacts may result.

1.2 Background Information

The client, Shane Aherne, has commissioned Cherryfield Ecology to undertake an EA for the site of Land lying to the south east of Burydell Lane, Park Street, St. Albans AL2 2PQ. Planning permission is being sought to carry out the development of the site for residential usage.

This survey has checked all habitats, buildings, trees (from ground level only) or structures due to be affected by the proposals on site; it includes checking for protected species, signs of protected species or habitat value e.g. crevices, badger setts, ponds etc. as well as mapping the habitats on site.

The inspection was conducted on the 16/02/2021.

The survey can only ever provide a 'snapshot' of the site at the time of the survey and circumstances may change following this report. Health and Safety restrictions or obstructions may limit the ability to find evidence.

Biological records have been requested to give the report context and allow a study of the surrounds. The information is often sensitive and therefore a synopsis is provided.

The survey can be conducted year-round with the optimal period between mid-March and mid-October (south)/1st April and 30th September (north). However, it can be limited due to bad weather and in the winter, when some species are not as active, thus evidence and species are often not found. During these periods, habitat value (likely presence) becomes more important to the assessment of the site.

Summary of legislation and National Planning Policy that protects wildlife in England:

- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
- Wildlife and Countryside Act 1981 as amended.
- Countrywide and Rights of Way Act 2000.
- Natural Environment and Rural Communities Act 2006.
- National Planning Policy Framework (“NPPF”).
- Circular 06/05.

This legislation makes it illegal to:

- Intentionally or deliberately kill, injure or capture a protected species.
- Deliberately disturb a protected species, whether at rest or not.
- Damage, destroy or obstruct access to a resting place.
- Possess or transport a protected species or any part of that species, unless acquired legally.
- Sell, barter or exchange a protected species, or any part of a species.

1.3 Species Specific Information

All UK protected species have the same protection and the detail under Bats also applies to GCN, Dormouse, Otters and the two UK protected reptiles.

1.3.1 Breeding Birds

All nesting birds are protected under the Wildlife and Countryside Act (as amended) 1981, which makes it an offence to intentionally kill, injure or take any wild bird or take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs. Furthermore, a number of birds enjoy further protection under that Act and are listed on Schedule 1 of the Act. These further protected birds are also protected from disturbance and it may be necessary to operate a “no-go” buffer zone around such nests - typically out to 5m.

1.3.2 Bats

All 18 species of bat common in the UK (17 known to be breeding) are fully protected under the Wildlife and Countryside Act (as amended) 1981 through inclusion in Schedule V of the Act. All bat species in the UK are also included in Schedule II of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which transpose Annex II of the Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (“Habitats Directive”) which defines United Kingdom protected species of animals.

Bats species are afforded further protection by the Countryside and Rights of Way Act 2000; and the Natural Environment and Rural Communities Act 2006.

This combined legislation makes it an offence to:

- Intentionally or deliberately kill, injure or capture bats.
- Deliberately disturb bats, whether at roost or not.
- Damage, destroy or obstruct access to bat roosts.
- Possess or transport bats, unless acquired legally.
- Sell, barter or exchange bats.

1.3.3 Reptiles

There are six species of reptiles in Great Britain (Edgar *et al.* 2010) and four of these are commonly found; the Grass Snake *Natrix natrix* and/or the Barred Grass Snake *Natrix helvetica*), Adder *Vipera berus*, Common Lizard *Zootoca vivipara* and Slow Worm *Anguis fragilis*.

All native British species of reptiles are legally protected through their inclusion in Schedule V of the Wildlife and Countryside Act 1981. As such, all species are protected from deliberate killing or injury. Therefore, where development is permitted, and there will be a significant change in land use, a reasonable effort must be undertaken to avoid committing an offence. The same act makes the trading of native reptile species a criminal offence without appropriate licensing.

Two species of reptile; the Smooth Snake *Coronella austriaca* and Sand Lizard *Lacerta agilis* are further protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which defines UK protected species of animals (“rare reptiles”).

1.3.4 Badgers

Badger *Meles meles* and its habitat are protected under The Protection of Badgers Act 1992, Schedule V of the Wildlife and Countryside Act 1981, and Appendix III of the Bern Convention 1979.

This legislation makes it an offence to:

- Kill, injure, take or possess a badger.
- Interfere with, damage or destroy a badger sett including e.g. obstruct access to a badger sett.
- Cruelly treat or harm a badger.
- Disturb a badger in a sett.

1.3.5 Great Crested Newts

Great Crested Newts (GCN) *Triturus cristatus* are listed in both The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and in Schedule V of the Wildlife and Countryside Act 1981.

GCN are afforded further protection by the Countryside and Rights of Way Act 2000; and the Natural Environment and Rural Communities Act 2006.

2.0 Methods

The survey follows the national guidelines JNCC (2010) and the following equipment is available for the inspection:

- Torches (e.g. LED Lensar type).
- Ladders (Standard 4m telescopic surveying ladder).
- Endoscope where holes, cracks and crevices are accessible.
- Mirrors (extendable and movable mirror face).
- Binoculars (Pentax close focus).
- Thermometer/hygrometer.
- Camera.
- Sample bags for collecting dropping and feeding evidence.

Target notes are made when appropriate to highlight, for example, protected species or an 'other feature(s)' of ecological note.

If a deviation from the guidelines has been made the reason and justification will be explained below:

No deviation from the standard guidelines has been made for this survey.

2.1 Limitations

This survey provides a snapshot of the site at the time of the survey only. Species are highly mobile and can turn up from time to time unexpectedly. All care has been taken to ensure the results and recommendations are suitable to the context of the development and the information gathered on surveys.

Table 1: Habitat value (likelihood) of protected species presence assessed against Collins (2016), Edgar *et al* (2010) and Natural England (2007) etc.

Likelihood of species presence (Habitat Value)	Features that species can use, regardless of evidence being present.
Confirmed Presence	<p>Species are found to be present during the survey.</p> <p>Evidence of species is found to be present during the survey.</p>
Higher likelihood of presence	<p>Buildings, trees or other structures with features of particular significance for use by protected species e.g. nesting habitat, roosting opportunities, and ponds.</p> <p>Habitat of high quality for foraging e.g. broadleaved woodland, tree-lined watercourses and grazed parkland.</p> <p>Site is connected with the wider landscape by strong linear features that would be used by commuting species e.g. river and or stream valleys and hedgerows.</p> <p>Site is close to known locations of records for protected species.</p>
Moderate and Lower likelihood of species presence	<p>Several potential habitat opportunities in buildings, trees or other habitats.</p> <p>Habitat could be used for foraging e.g. trees, shrub, grassland or water.</p> <p>Site is connected with the wider landscape by linear features that could be used by commuting species e.g. lines of trees and scrub or linked back gardens.</p> <p>A small number of less significant habitat opportunities.</p> <p>Isolated habitat for foraging e.g. a lone tree or patch of scrub.</p> <p>An isolated site not connected by prominent linear landscape features.</p>
Negligible likelihood of species presence	<p>No features suitable for roosting, minor foraging or commuting.</p>

3.0 Results

The following section details the results of the desk study, inspection and survey; it includes MAGIC information, biological records data and map/aerial photo information. The results detail the building, structure or tree (numbered for reference) description of any evidence found and habitat value if no evidence has been located.

3.1 Desk Study

The desk study is centred on Grid Reference - TL149040 and Postcode - AL2 2PQ.

Table 2: Weather Records

Temperature	11°C
Cloud cover	100%
Precipitation	Light
Wind	1/12

3.2 MAGIC

The following statutory sites and Natural England Protected Species (NEPS) have been located within the 2km search area (Figure 1).

- There is a single statutory site located within the search area, which is designated as a special site of scientific interest (SSSI). Moor Mill Quarry, West SSSI is found approx. 1.8km south west and is classed as being in an unfavorable condition.
- There are 6 NEPS licences granted for bats and GCN within the search area:
 - Common Pipistrelle *Pipistrellus pipistrellus* and Soprano Pipistrelle *Pipistrellus pygmaeus*, approx. 1.8km north west of site (License 2014-3738)
 - Common Pipistrelle *Pipistrellus pipistrellus* approx. 1.9km south west of site (License 2010-2620)
 - Common Pipistrelle *Pipistrellus pipistrellus* approx. 1.7km west of site (License 2010-1663)

- Great crested newt *Triturus cristatus* approx. 1km east of site (License 2015-16251)
- Great crested newt *Triturus cristatus* approx. 1.9km south west of site (License 2009-1313)
- Great crested newt *Triturus cristatus* approx. 1.9km south west of site (License 2009-069).

MAGiC

Burydell Lane, AL2 2PQ

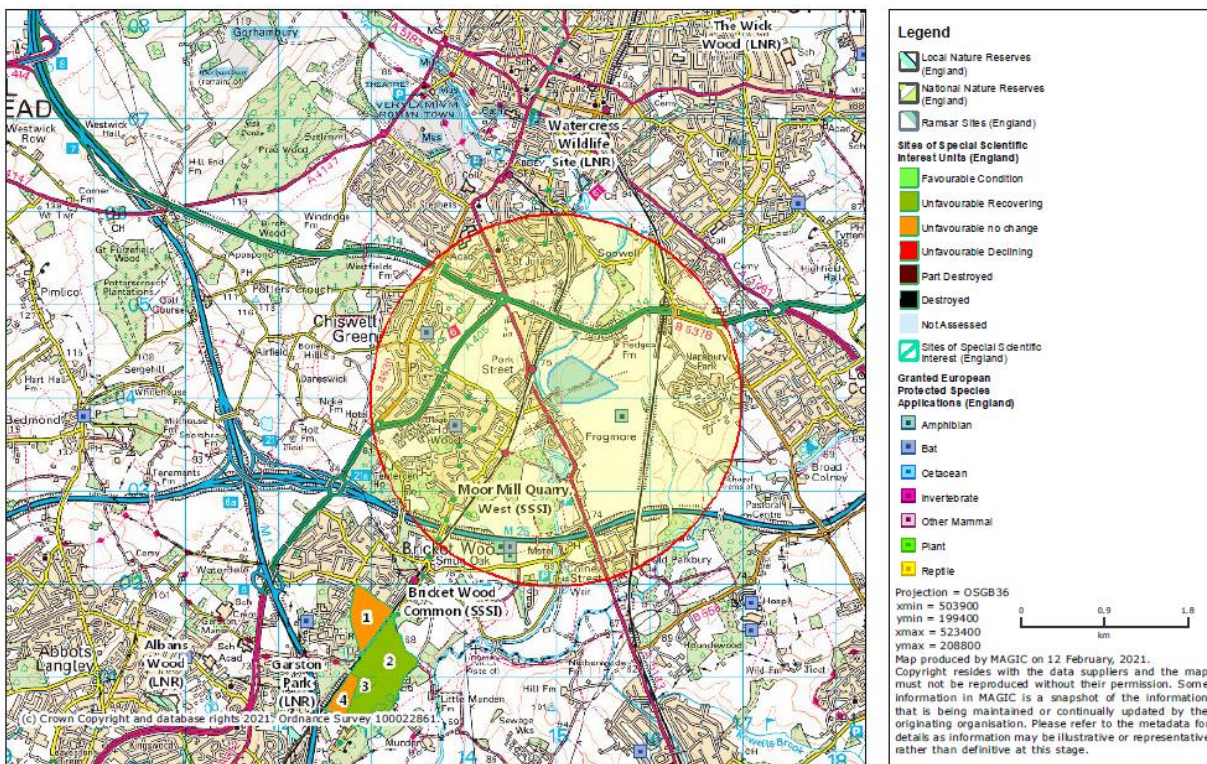


Figure 1: Magic Map Search

3.3 Biological Records Data

A standard 1km data search of existing records for protected species and nature reserves has been commissioned, below details the results and site context.

Biological records were obtained from Herts Environmental Records Centre (HERC,2021), with a total of 6,223 biological records provided.

Table 3: Biological Records

Species	Number of Records	Closest Record (accuracy)	Most Recent Record (year)
<p>Amphibians</p> <p>Great Crest Newt <i>Triturus cristatus</i> Common toad <i>Bufo bufo</i></p>	11	0m (10km accuracy)	1998
<p>Bats</p> <p>Brown Long-Eared <i>Plecotus auritus</i> Common Pipistrelle <i>Pipistrellus pipistrellus</i> Daubenton's <i>Myotis daubentonii</i> Leisler's <i>Nyctalus leislerii</i> Noctule <i>Nyctalus noctula</i> Soprano Pipistrelle <i>Pipistrellus pygmaeus</i> Unidentified Bat <i>Chiroptera sp.</i> Unidentified Pipistrelle <i>Pipistrellus sp.</i></p>	61	60m (1km accuracy)	2015
<p>Mammals (exc. Bats)</p> <p>Badger <i>Meles meles</i> Hazel Dormouse <i>Muscardinus avellanarius</i> Water Vole <i>Arvicola amphibius</i> Brown hare <i>Lepus europaeus</i> Harvest mouse <i>Micromys minutus</i> Hedgehog <i>Erinaceus europaeus</i> Weasel <i>Mustela nivalis</i> Stoat <i>Mustela erminea</i> Water shrew <i>Neomys fodiens</i> Grey squirrel <i>Sciurus carolinensis</i> Muntjac deer <i>Muntiacus reevesi</i> Sika deer <i>Cervus nippon</i> American mink <i>Neovison vison</i></p>	66	400m (10m accuracy)	2019
<p>Reptiles</p> <p>Common Lizard <i>Zootoca vivipara</i> Grass Snake <i>Natrix helvetica</i> Slow-Worm <i>Anguis fragilis</i></p>	19	370m (10m accuracy)	2018
<p>Other</p> <p>Birds, Invertebrates, Plants etc.</p>	6,066	0m (100m accuracy)	2018

Non-Statutory Sites			
Name	Reference No.	Type	Description/designated for
Ver Valley Meadows	68/002	Local Wildlife Site (LWS)	A series of old mainly unimproved meadows along the valley of the River Ver supporting predominantly neutral grassland but with more acid communities on areas of higher ground. The grassland varies from damp to very wet, with marshy grass and rarer swamp/fen vegetation present in lower lying areas. 100m from site.
Frogmore Gravel Pit	76/023/02	LWS	Former gravel workings supporting a mosaic of habitats including rough grassland, a reach of the River Ver, flooded gravel pit lakes, permanent and temporary pools and dry to wet secondary broadleaved woodland and scrub.
Moor Mill & Park Street Pits West Grassland	76/023/04	LWS	A substantial area of relatively overgrown grassland with scattered areas of scrubland, on a former gravel extraction site.
Chalkdell Wood (St Julians)	77/024	LWS	Part old/ancient woodland part wet secondary woodland and fen
Grassland at former Radlett Aerodrome	77/025/01	LWS	Old secondary, essentially unimproved, neutral to acidic grassland. The best acidic areas occur as a mosaic with coarser more neutral grassland.
Quarry at Former Radlett Aerodrome	77/082	LWS	Extensive former gravel quarry supporting re-seeded grassland, lagoons, pools and ponds; the larger water bodies being near the northern

		<p>edge of the site. There are also recent plantation woodlands along part of the western boundary, southern and south-eastern boundaries. The quarry floor is very flat and largely open. The site is particularly important for birds, mainly waterfowl and wetland species, including many breeding species.</p>
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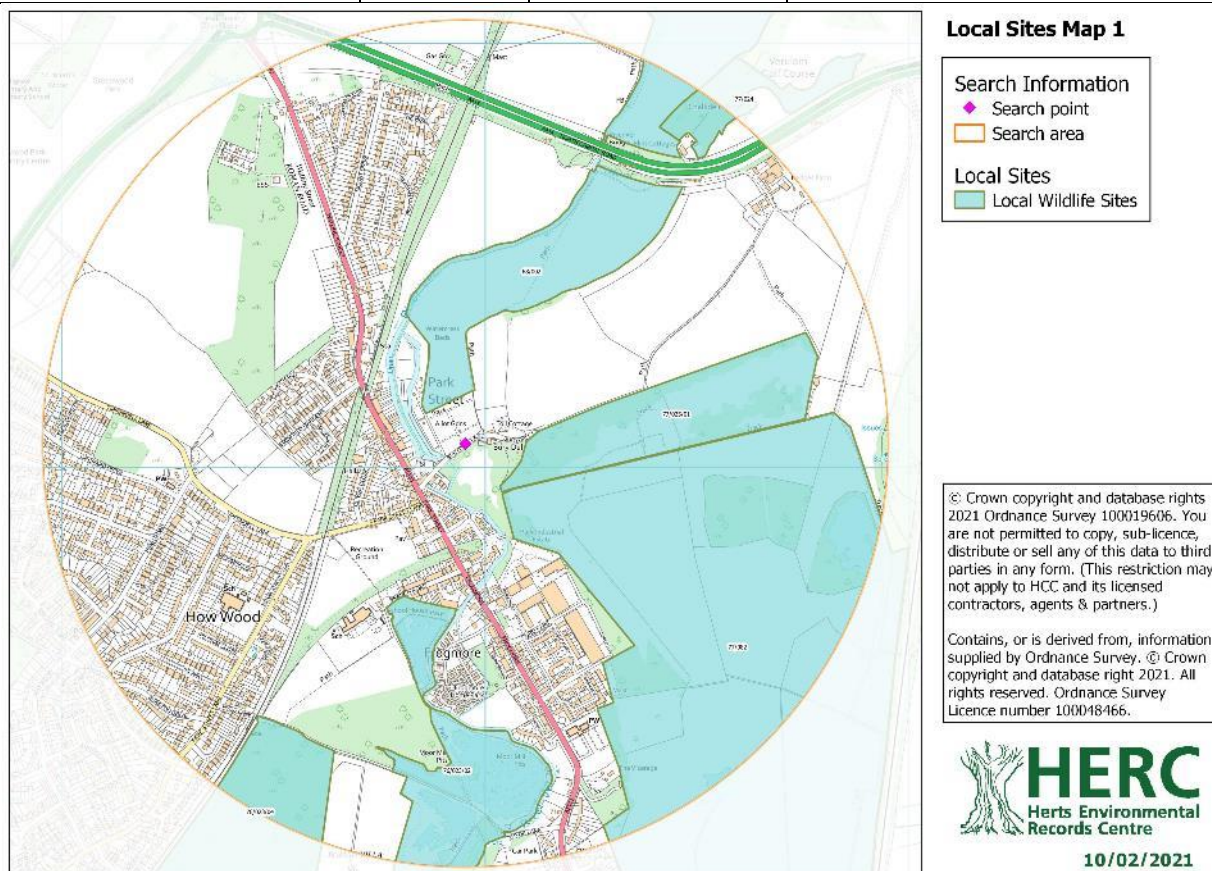


Figure 1a: Local wildlife site location map.

3.4 Site Location and Surrounds

The site is located in St Albans, Hertfordshire and is surrounded by low density urban sprawl with pasture and arable fields in the immediate local. Table 4 details the commuting, feeding and habitat features in a 1km radius of the site.

Table 4: Habitat features suitable for use by protected species.

Feature	Description
Water course	The River Ver borders the site to the western boundary. It is also found approx. 540m north.
Water bodies	Unnamed water bodies are found approx. 400m south west and 650m south. A small unnamed water body is found approx. 995m east.
Woodland	In addition to the small amounts of woodland found on site, there is scattered woodland to the north, north east of the north eastern boundary of site approx. 50m and stretches for approx. 800m east. Woodland and scattered woodland are found approx. 450m south west of the site and stretch for a further 1km. Woodland is also found approx. 935m south of site.
Linear e.g. hedgerows	There are agricultural and residential hedgerow found in the general surrounds with moderate links to the wider landscape.
Pasture/arable/grassland	Most of the surrounds comprises of a mixture of parkland, arable and pasture.
Other	A railway line is found approx. 350m west of site.

3.5 Habitat, Building, Tree or Other Structure

This section details the structures/habitat reference and descriptions (see Figure 14 for Site Plan).

3.5.1 Habitats

3.5.2 Scattered trees

Trees are found scattered across the site, mostly to the boundaries and close to woodland edges. Tree species included *Acer. sp*, oak *Quercus sp.*, ash *Fraxinus excelsior*, willow *Salix sp.*, pine *Pinus. sp* and hawthorn *Crataegus monogyna*.



Figure 2: Example of scattered trees found on site.



Figure 3: Example of scattered trees found on site.

3.5.3 Woodland

Small areas of woodland are found on site with the largest of these found to the south of site. The smallest woodland found further north consists of self-set poplar *Populus* sp, with the other woodlands a mixture of hawthorn, willow, ash and oak species.



Figure 4: Example of woodland edge.



Figure 5: Example of woodland edge.

3.5.4 Bare ground

Bare ground is found scattered across site. These mainly form pathways around site, vehicle parking areas and salvaged material storage areas.



Figure 5: Example of pathway around site.



Figure 6: Example of bare ground in storage area.

3.5.5 Improved grass

Small patches of improved grass were found fairly central on site. Species here included perennial ryegrass, creeping buttercup *Ranunculus repens* and common dandelion *Taraxacum officinale*.



Figure 7: Example of small patch of improved grass.

3.5.6 Ephemeral

An area of ephemeral vegetation is found centrally on site close to improved grass and tall ruderal vegetation. Species here included unidentified moss species, white clover *Trifolium repens*, creeping buttercup *Ranunculus repens*, and black medic *Medicago lupulina*.



Figure 8: Example of ephemeral vegetation.

3.5.7 Tall Ruderal

Scattered amounts of tall ruderal vegetation are found across site with some large clumps found close to the woodland edges and borders of the site. Species type was dominated by bramble *Rubus fruticosus* with some other species such as nettle *Urtica dioica*, teasel *Dipsacus fullonum* and cow parsley *Anthriscus sylvestris* also present.






Figure 9: Example of tall ruderal vegetation.



Figure 10: Example of clumps of tall ruderal vegetation.

Table 5: Target Notes

Target Note	Description
T1	<p data-bbox="427 1360 690 1392">Disused birds nest</p>  <p data-bbox="427 1801 1398 1833">Figure 11: Example of one of the discussed bird nests found on site.</p>

<p>T2</p>	<p>Log/deadwood/debris piles/wood chip with reptile hibernaculum potential.</p>  <p>16 Feb 2021 10:51:49 The Beeches Cherryfield Ecology Ltd</p> <p>Figure 12: Example of log pile.</p>  <p>16 Feb 2021 11:16:41 Bucknell Lane Cherryfield Ecology Ltd</p> <p>Figure 13: Example of woodchip pile.</p>
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3.6 Species List

Apple	<i>Malus</i> sp.
Ash	<i>Fraxinus excelsior</i>
Bent	<i>Agrostis</i> sp.
Birch	<i>Betula</i> sp.
Black Medick	<i>Medicago lupulina</i>
Bramble	<i>Rubus fruticosus</i>
Bristly Oxtongue	<i>Picris echioides</i>
Buddleia	<i>Buddleja davidii</i>
Cleavers	<i>Galium aparine</i>
Common Bent	<i>Agrostis capillaris</i>
Cow Parsley	<i>Anthriscus sylvestris</i>
Creeping Buttercup	<i>Ranunculus repens</i>
Creeping Thistle	<i>Cirsium arvense</i>
Daisy	<i>Bellis perennis</i>

Daffodil	<i>Narcissus</i>
Dandelion	<i>Taraxacum officinale</i>
Elder	<i>Sambucus nigra</i>
Ground-Ivy	<i>Glechoma hederacea</i>
Hawthorn	<i>Crataegus monogyna</i>
Herb-Robert	<i>Geranium robertianum</i>
Holly	<i>Ilex aquifolium</i>
Ivy	<i>Hedera helix</i>
Leyland Cypress	<i>Cuprocyparis leylandii</i>
Nettle	<i>Urtica dioica</i>
Norway Maple	<i>Acer platanoides</i>
Oak	<i>Quercus</i> sp.
Perennial Rye-Grass	<i>Lolium perenne</i>
Pine	<i>Pinus</i> sp.
Poplar	<i>Populus</i> sp.
Rhododendron	<i>Rhododendron ponticum</i>
Ribwort Plantain	<i>Plantago lanceolata</i>
Snowdrop	<i>Galanthus</i> .sp.
Spear Thistle	<i>Cirsium vulgare</i>
Sycamore	<i>Acer pseudoplatanus</i>
Teasel	<i>Dipsacus fullonum</i>
White Clover	<i>Trifolium repens</i>
Willow	<i>Salix</i> sp.
Willowherb	<i>Epilobium</i> sp.
Yew	<i>Taxus baccata</i>



Figure 14: Site Plan

3.7 Evidence or Likelihood of Species Presence

This section details the evidence located and likelihood of species presence.

3.7.1 Bats

Table 6: Bats, evidence or the potential for the species.

Bats found	No bats were found at the time of the survey.
Evidence of bat use	No evidence of bats was found at the time of the survey.
Potential for bat use	<p>Level of likelihood of presence - High.</p> <p>Two trees were noted for their potential for roosting bats. A mature apple tree <i>Malus</i> sp. found to the north eastern corner of site exhibited large rot holes which were connected to some hollow branches. Given the type of features mentioned and its surrounds, this mature apple tree is considered to be of high potential for roosting bats.</p> <p>A willow tree on the eastern boundary, close to the River Ver, also exhibited features suitable for roosting bats. A large knot hole was</p>

found along with loose flaking bark and gaps around a branch split, all suitable features that roosting bats could utilize. Given the type of features mentioned and its surrounds, this willow tree is considered to be of high potential for roosting bats.

All other trees on site were inspected from ground level and none were found to exhibit any suitable roosting features for bats and therefore considered negligible.



Figure 15: Example of rot hole on mature apple tree.



Figure 16: Example of rot hole on mature apple tree leading up to hollows in branches.



Figure 17: Example of apples tree with rot holes and knot holes.



Figure 18: Willow tree with knot hole.



Figure 19: Zoomed in section of knot hole on willow.



Figure 20: Split branch which has created more loose bark and potential roosting features/access.

3.7.2 Badgers

Table 7: Badgers, evidence or the potential for the species



Badgers found	No badgers were found at the time of the survey.
Evidence of badger use	<p>Approx. 3 sett entrances were found on site. These were all found in the area of woodland to the south of site. In addition, there was also evidence of a pathway to one of the sett entrances, with traces of what could be bits of vegetation that have been gathered to be used as bedding.</p> 

Figure 21: Example of sett entrance.

	 <p>Figure 22: Example of sett entrance.</p>
<p>Potential for badger use</p>	<p>Level of likelihood of presence - High.</p> <p>Connectivity to the site is good especially to the south east. All three sett entrances looked clear of debris and litter, as well as clear pathways to and from sett entrances all indicate that these entrances are still in use.</p>

3.7.3 Breeding Birds

Table 8: Breeding birds, evidence or potential for the species

<p>Breeding birds found</p>	<p>No breeding birds were found at the time of the survey.</p>
<p>Evidence of breeding bird use</p>	<p>Two disused birds' nests were found to be present on site.</p>
<p>Potential for breeding bird use</p>	<p>Level of likelihood of presence - High.</p> <p>The scattered trees and woodland found on site have nesting potential for breeding birds. In addition to the disused birds' nests on site, songbirds were also seen and heard on site at the time of survey.</p>

3.7.4 Amphibian

Table 9: Amphibians, evidence or potential for species use.

<p>Amphibians found</p>	<p>No Great Crested Newt (GCN) were found at the time of the survey.</p>
<p>Evidence of amphibian use</p>	<p>No evidence of GCN was found at the time of the survey.</p>
<p>Potential for amphibian use</p>	<p>Level of likelihood of presence - Low.</p> <p>No water bodies are found on site with the closest being found approx. 400m south west and 650m south. Connectivity between these water bodies and the site are fairly poor due to housing and roads between the</p>

	site and them. There is deadwood, log piles and piles of salvaged materials/debris on site that could potential be used by common amphibian for refuge.
--	---

3.7.5 Reptile

Table 10: Reptiles, evidence or potential for species use.

Reptiles found	No reptiles were found at the time of the survey.
Evidence of reptile use	No evidence of reptiles was found at the time of the survey.
Potential for reptile use	Level of likelihood of presence - High. The mosaic of habitats found on site that include bare ground, tall ruderal vegetation and improved grass are known to be used by common reptiles. In addition to this there were areas of deadwood, log piles and piles of salvaged materials/debris on site that could be used as a refuge/hibernaculum.

3.7.6 Other Species e.g. Hazel Dormouse

Table 11: Other protected species, evidence or potential for species use.

Species found	No other protected species were found at the time of the survey.
Evidence of species use	No evidence of other protected species was found at the time of the survey.
Potential for species use	Level of likelihood of presence - Negligible. No suitable habitat was found to be present on site.

3.7.7 Invasive Non-Native

No invasive non-native species were found at the time of the survey.

4.0 Conclusions, Discussion, Impacts and Recommendations

The following section details the conclusions, discussion, impacts and recommendations in the context of the proposed works.

4.1 Conclusion and Discussion

The proposals include for the development of the site for residential usage. The site consists of scattered trees, woodland, bare ground, small patches of improved grassland, ephemeral vegetation, and tall ruderal vegetation.

No bats or evidence of bats were found in or on a mature apple tree to the north east of site or the willow to the west of site at the time of survey, however, features suitable for roosting were found. This includes gaps and crevices found in rot holes, knot holes, broken branches, and loose bark. Given the type of potential roosting features that are found, coupled with surrounding habitat features, both the mature apple tree to the north east and the willow to the west boundary are considered to be of high potential for roosting bats.

All other trees on site were inspected from ground level but did not exhibit any potential suitable roosting features and therefore considered negligible.

There is suitable nesting habitat to support breeding birds in the scattered trees and woodland found on site.

Approx. 3 badger sett entrances were found in the area of woodland to the south of site, as well clear pathways. Due to these factors, it is likely that the site is being used or has been used by badgers.

There is suitable habitat to support common reptiles on site in the mosaic of habitat types such as the bare ground, improved grass, and tall ruderal vegetation. In addition, there were areas of deadwood, log piles and piles of salvaged materials/debris on site that could be used as a refuge/hibernaculum by both common reptile and amphibians. The western boundary of the site is bordered by the River Ver. As an added precaution to help protect the River Ver, whilst works are occurring, it is suggested that screens are put in place to minimize any potential dust pollution from the proposed works.

4.2 Potential Impacts

Impact assessments must be proportionate to the scale of the development (CIEEM, 2018) and Table 12 details a proportionate impact assessment based on current information.

Table 12: Impact Assessment

<p>Impact</p>	<p>Bats - A bat roost will be lost in the development. Breeding Birds - Active nests may be lost in the development. Badger: A badger sett may be lost in the development. Reptiles - Loss of habitat. River Ver - Possible increase in the amount of pollution during works, e.g. dust.</p>
<p>Characterisation of unmitigated impact on the feature</p>	<p>Bats - A low-level loss/impact at a local level. Breeding Birds - A low-level loss/impact at a local level. Badger - A badger sett maybe destroyed in the development resulting in a low-level impact at local level Reptiles - A low-level loss/impact at a local level. River Ver - Potential pollution to River Shep and neighboring statutory site to the south east.</p>
<p>Effect without mitigation</p>	<p>Without mitigation individual bats, birds, badger, and reptiles could be killed, injured or trapped during the works. River Ver - Possible pollution and disturbance.</p>
<p>Mitigation and/or potential enhancement</p>	<p>See Table 13 and Table 14</p>
<p>Significance of effects of residual impacts (after mitigation)</p>	<p>Bats - If lost roosts are replaced by bat boxes, the effects would be negligible. Breeding Birds - If lost habitat is replaced by bird boxes and mitigation is followed, the effects would be negligible. Badger - If mitigation is followed, the effects would be negligible. Reptiles - If mitigation is followed, the effects would be negligible. River Ver - If barriers are erected, the effects to the river would be negligible.</p>

4.3 Recommendations

Badger - It is recommended that a full survey is carried out for badgers. This is to be done over a four-week period to see if the sett is still in use. Once full survey is carried out, mitigation measures can then be put into place, if required.

Bats - **Presence/likely absence surveys** will be required for both trees identified for bat potential (three surveys, at least two weeks apart), with two surveyors to cover the mature apple tree and two surveyors to cover the willow tree; two of these surveys will need to be undertaken during the optimal timeframe of mid-May to August.

Breeding Birds - No further surveys are recommended; however, the development should take place outside the nesting season (March to August). If this is not possible, it is recommended that a qualified ecologist is on site to ensure the trees on site are not occupied by breeding birds, prior to demolition. Should an occupied nest be found, a buffer zone would need to be created until the nest is no longer in use.

GCN - No further survey is necessary; however, a qualified ecologist will need to supervise the clearance of any log pile/deadwood pile/salvaged materials on site via a destructive search.

Reptiles - **Presence/ likely absence surveys** for reptiles would be required to establish if any species are using the site. These will be done between the months of March and October. Bitumen tiles will be placed across the site in week one and will then be checked once a week over a seven-week period, in suitable weather (9°C to 18°C, no rain, little winds and sunny).


Bordering River - It is suggested that a barrier is installed to help protect the bordering River Ver. During the proposed works it is recommended that screening barriers

are used to mitigate any effects on the River Ver through possible dust and pollution. Once works are complete these screening barriers can be removed. Under the terms of the Water Resources Act 1991, and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of a *main river* (Development near water Environmental Agency consent guidance, 2020). Therefore, the screening should be placed 8m from the river.

4.4 Recommended Enhancements and Mitigation

Table 13: Recommended Mitigation

Work	Specification
<p>General Information</p>	<p>No development will occur until bat surveys consistent with the Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition) (Collins et al. 2016) have been undertaken in the appropriate survey season, May to September (Mid-May to August optimal) for the identified trees with bat potential.</p> <p>The Three Tests to be answered before planning can be granted (NE, 2017):</p> <p><i>Test 1:</i> Regulation 53(2)(e) states: a licence can be granted for the purposes of “preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment”.</p> <p>Test 1 can be achieved via the ‘imperative reasons of overriding public interest’. Although not for the ecologist to determine the planning officer will on grant of consent.</p> <p><i>Test 2:</i> Regulation 53(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”.</p> <p>Test 2 would be achieved on the grant of consent as no other sites have been considered for the development.</p> <p><i>Test 3:</i> Regulation 53(9) (b) states: the appropriate authority shall not grant a licence unless they are satisfied “that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.”</p> <p>Test 3 will be achieved once full emergence/re-entry surveys are conducted and full mitigation appropriate to species and population has been designed and</p>

	<p>implemented via an NEPS licence issued from the statutory authority (Natural England), if this becomes necessary following a dusk and pre-dawn survey.</p>
<p>Mitigation and Compensation to be installed via an NEPS licence application (if required)</p>	<p>Should bats be discovered on the stage 2 surveys, a license will be required post planning for works to proceed lawfully. Demolition of suitable bat roosting features e.g. branches etc. will require the supervision of a bat licensed ecologist.</p> <p>The suitable bat roosting features e.g. branches. will be stripped by hand only. All areas across the tree(s) etc. will be checked for bats i.e. endoscope (where possible) and via destructive search. If bats are found these will be removed by hand (Ecologist only) and placed in bat boxes that will be in place before works begin.</p> <p>Bat boxes will be installed. These will be no less than 3m above ground level and away from any neighbouring ledge to prevent local cats predated on bats using the boxes.</p> <p>A minimum of three Schweglar 1FF or similar boxes (Figure 23) will be hung on the trees at a minimum of 3m from ground level and face south/southwesterly. These boxes are known to be used by crevice and void dwelling species.</p> <div data-bbox="794 1031 1049 1339" data-label="Image">  </div> <p>Figure 23: Schweglar 1FF bat box</p> <p>Two bat tubes can/will also be built into any new building(s), these will be located on a gable end towards the apex or at eave height, ideally they will face in the same direction as the known roost in the building and if used as enhancement will face south or north (Figure 24)</p>


	 <p style="text-align: center;">Figure 24: Example of bat tube</p> <p>Commuting bats maybe using the grounds and surrounds - therefore, any tree, hedges or linear feature should be retained were possible.</p>
<p>Lighting</p>	<p>Any lighting near or shining onto any trees, especially those with bat boxes in or commuting routes shown to be present at further survey stage, should be designed to minimize the impact it has on potential bat roosting and commuting.</p> <p>Lighting should be in line with the BCT lighting guidelines (Bats and Lighting in the UK (Bat Conservation Trust, 2018)</p> <p>https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/</p> <p>This lighting should be of low level, be on downward deflectors and ideally be on PIR sensors. Using LED directional lighting can also be a way of minimizing the light spill affecting the habitat. No up-lighting should be used.</p> <p>This will ensure that the roosting and commuting resources that the bats are likely to be using is maintained.</p>
<p>Badger</p>	<p>Once plans for the site have been finalised and the results of the recommended badger survey have been gathered, then mitigation in relation to badger can be confirmed.</p>

Table 14: The local authority has a duty to enhance biodiversity in its day to day duties, the following are suggested enhancements that are easily installed into a development and can be cost effective whilst ensuing a gain for local wildlife.

Work	Specification
<p>Bird and insect box enhancement.</p>	<p>Bird boxes for a variety of different species can also be installed.</p>

A selection of open fronted boxes and songbird boxes can be installed (Figure 25 and Figure 26); it is recommended that a minimum of two of each of the boxes are installed.



Figure 25: Robin box



Figure 26: Songbird box

A variety of insect boxes can be installed in the area; a minimum of one box is recommended (Figure 27 and Figure 28).



Figure 27: Urban bee nesting box, used for solitary bees and wasps



Figure 28: Bug biome, ideal for ladybirds, lacewings and bees

Hedgehog highways and small mammal connectivity.

In order to allow hedgehogs and other small mammals a continuous corridor across the site, thus linking the garden and green spaces.

- A 13cm by 13cm is sufficient for any hedgehog to pass through. This will be too small for nearly all pets (Figure 29).
- Remove a brick from the bottom of the wall, creating a 13cm by 13cm hole.
- Cut a small hole in your fence if there are no gaps.
- Dig a channel underneath your wall, fence or gate.
- Ideally, rather than walls or fences, a hedge will provide foraging, shelter and a route along as well as through the site.



Figure 29: Hedgehog Highway, Source - Wildlife Trust - <http://7474fab53f1b6ee92458->

	<p style="text-align: center;"><i>8f3ac932bad207a00c83e77eaae8d15c.r12.cf1.rackcdn.com/Hedgehog%20Highway.jpg</i></p>
<p>Swifts <i>Apus apus</i></p>	<p>Swift nest boxes are recommended due to the increased lack of nesting opportunities swifts are finding in modern built dwelling homes.</p> <p>Information is adapted from the RSPB https://www.rspb.org.uk/our-work/rspb-news/news/stories/swift-advice-for-ecologists/ and http://actionforswifts.blogspot.com</p> <p>The following will be undertaken:</p> <ul style="list-style-type: none"> • Wherever possible, swift bricks will be installed into new or restored buildings to increase the overall availability of nest sites for swifts and other species. Birds such as house sparrow can use swift bricks, but swifts cannot use house sparrow nest bricks. • Integral swift bricks are the preferred option on new housing developments. These should be fitted in clusters of 2 to 4 on gable ends and near the roofline where swifts would naturally look for a potential nest site. • Try to ensure swift bricks have a minimum of 5m clearance beneath and in front. Always avoid locating them above doors and windows to help prevent a disturbance issue to both the birds and human owners. • Alternatively, swift boxes can be placed on the external walls of a building when a restoration or opportunities don't exist to build in the boxes.



Figure 30: Example of swift bricks, that can be built into a dwelling, Source: <https://www.birdbrickhouses.co.uk/brick-nesting-boxes/>

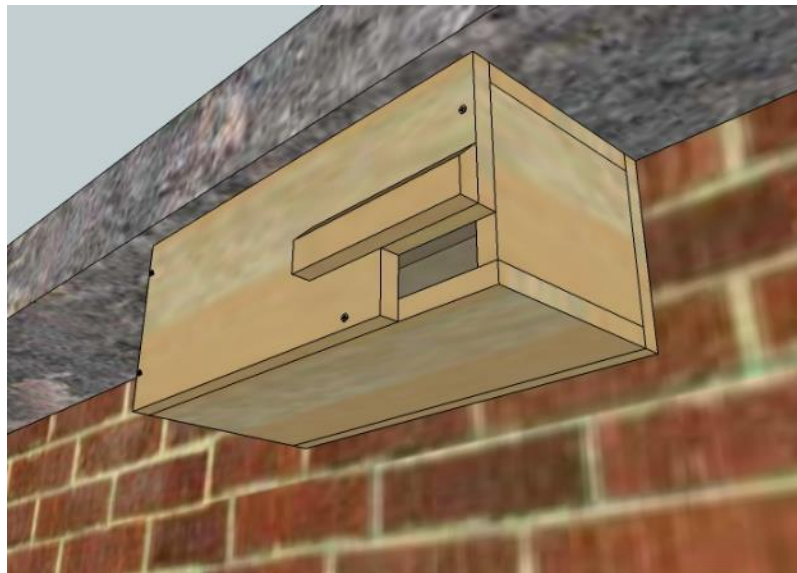


Figure 31: Swift box, source: <http://actionforswifts.blogspot.com/p/diy-swift-box-designs.html>

<p>Hedgerows</p>	<p>Hedgerows provide excellent corridors for wildlife and are extremely important to many species of wildlife. A hedgerow could be included in development plans to assist a range of species (Figure 32).</p>
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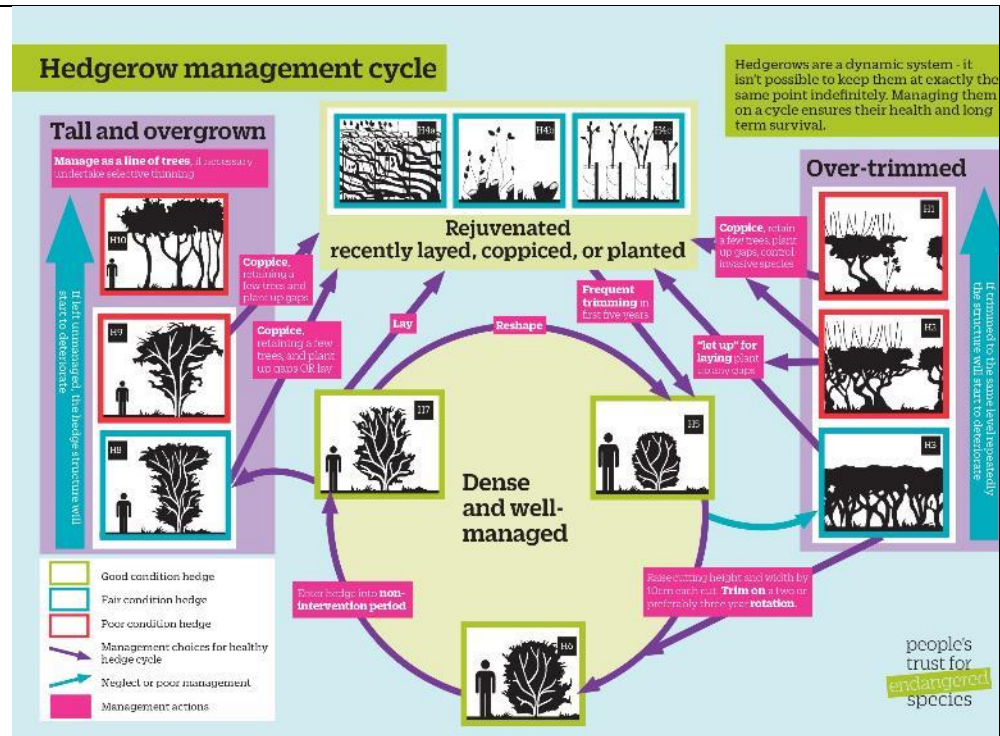


Figure 32: Hedgerow management cycle (<https://hedgerowsurvey.ptes.org/>)

<p>Reptiles Habitat Enhancement</p>	<p>Log and brush piles can enhance the existing habitat by providing cover for reptiles, as well as enhancing prey availability. Also, including reptile hibernacula and basking banks into development plans will enhance the habitat for reptiles. (Edgar et al., 2010).</p>
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5.0 References

- CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, September 2018. Chartered Institute of Ecology and Environmental Management, Winchester, online at <https://www.cieem.net/data/files/ECIA%20Guidelines.pdf>
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- Google Earth, (2017), Located on site postcode, online
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- Records: Herts Environmental Records Centre , (2021), Records Data, HERC
- The Great British Hedgerow Survey (2019), People's Trust for Endangered Species, online <https://hedgerowsurvey.ptes.org/>, accessed report date.
- Tom Langton, Catherine Beckett and Jim Foster (2001). Great Crested Newt Conservation Handbook. Froglife.

APPENDIX 5

Completed Call for Sites Form

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	Neil Jones
Company/Organisation	NL Jones Planning
Address	Duke House Business Hub, Duke Street, Skipton
Postcode	BD23 2HQ
Telephone	
Email	
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details			
Requirements:			
<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 			
Site address/location (Please provide a map showing the site boundary)	Land South of Burydell Lane, Park Street		
Site area (in hectares)	2.0 approx.		
Coordinates	Easting	N/A	Northing N/A
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Landownership (please include contact details if known)	The site is all in one freehold ownership – Title Plan No HD440272		
Current land use	Grassland / Scrubland		
Condition of current use (e.g. vacant, derelict)	Grassland / Scrubland		
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)		
Reasons for suggested development / land use	See supporting statement		

Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years
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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 checked="" type="checkbox"/> Yes (part – see supporting statement)
	Topography affecting site (land levels, slopes, ground conditions)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input checked="" type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history) Please refer to supporting statement.	
Other comments	Please refer to supporting statements.	

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
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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.

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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	David Parry
Company/Organisation	
Address	103 Park Street Lane, Park Street, St Albans, Herts
Postcode	AL2 2JF
Telephone	
Email	
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details					
Requirements: <ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 					
Site address/location (Please provide a map showing the site boundary)	Land to the N Bricket Wood, bounded by the M25 and A405, North Orbital				
Site area (in hectares)	6.3ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td>12900</td> <td>Northing</td> <td>02740</td> </tr> </table>	Easting	12900	Northing	02740
Easting	12900	Northing	02740		
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	Burston Garden Centre C/o Agent				
Current land use	Vacant				
Condition of current use (e.g. vacant, derelict)	Vacant				
Suggested land use	<input type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify) – Community Use				
Reasons for suggested development / land use	Proposal enhances Community and frees up other land for development elsewhere.				

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

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

	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input checked="" type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other	
Other comments	Please include details of the above choice below (for example planning reference numbers and site history) See Emerging Neighbourhood Plan	
	See attached documentation	



3D View 1



Total Site Area 6.3ha

Indicative Community Buildings - total 480m2

1 Site Plan Donkey field
1:1000

Ordnance Survey, (c) Crown Copyright 2012. All rights reserved. Licence number 100020449

March 2021

Response to St Albans District Council “Call for Sites” on behalf of Burstons Garden Centres

Land known as the “Donkey Field” to the north west of Bricket Wood between Bricket Wood, the M25 and the A405 North Orbital Road.

Background

The site in question is part of the Metropolitan Green Belt and although originally farmland, was used as the construction site depot for the building and subsequent widening of the M25. Since this time, due to ground conditions and the alteration of the topography, the site has been left vacant. Access for large machinery to enable it to be restored for farmland would have to be directly off the A405 in a location adjacent to the junction 21A of the M25.

Since the work on the M25, the site has remained vacant other than a significant traveller incursion. The site is of approximately triangular shape with a secondary vehicle access direct from the corner of Woodside Road and The Meads into Bricket Wood. The south west boundary is formed by a public footpath from Woodside Road/The Meads to junction 21A. This has become significantly underused, partially due to the difficult terrain it crosses immediately to the south of junction of 21A, where a mound was erected as part of the motorway works.

Proposal

The land has been identified in the emerging Neighbourhood Plan as suitable for community use. Extensive discussions have taken place between the site owners, local representatives at various levels of Government, community organisations and local residents about the possible re-generation of this land for the benefit of the local community.

The proposal is to upgrade and add to the rights of way to include improvements to the existing right of way and additional footpaths/bridle way routes. This has been discussed with the Herts County Council Rights of Way Officers. Much of the area is proposed to be public access, open amenity land, although it is also proposed to carry out extensive tree planting to form a visual, noise and pollution barrier to the M25. This should benefit much of the existing village. It is also proposed to provide allotments, for which there is a waiting list in the area.

It is also proposed that community facilities are provided for the village of Bricket Wood with an access direct from the Woodside/Meads access. This is a convenient access for residents of the village of Bricket Wood, although it would be expected a significant

number of users would walk, bearing in mind the position. Shown on the plan is a replacement Scout Headquarters and replacement location of the Parish Council and community facilities as illustrations of possible suitable community development. This Plan has been prepared following liaison with the Parish Council and Bricket Wood Scouts and could potentially result in the freeing up of two further sites for residential development elsewhere in the village.

Conclusion

This proposal brings into public use current private and derelict land which has been subject to unauthorised incursions and dumping, and potentially enables small scale residential development within other parts of Bricket Wood.

It is in accordance with the emerging Neighbourhood Plan, providing additional amenity space, enhanced community facilities, and environmental benefits and should therefore be included in the St Albans Local Plan.

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.

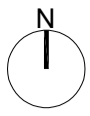
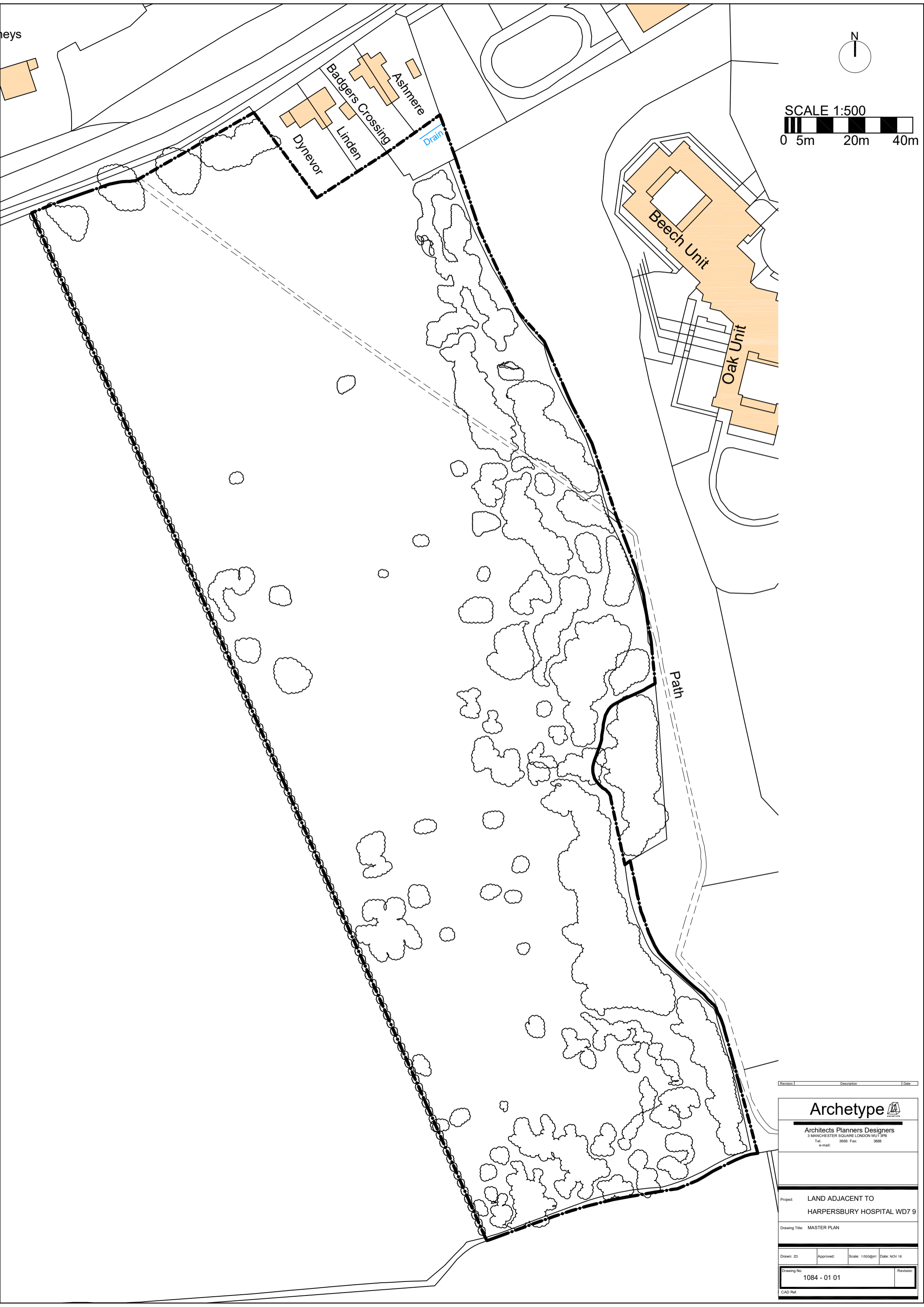
Your Details	
Name	Michelle Sweeney
Company/Organisation	Archetype Associates Ltd
Address	Office 8, 121 Gloucester Place, London
Postcode	W1U 6JY
Telephone	
Email	
Your interest	Other – Agent acting on behalf of Landowner/ Developer

Site Details			
Requirements:			
<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 			
Site address/location (Please provide a map showing the site boundary)	Land to the West of Kingsley Green, Harpers Lane, Shenley, Radlett		
Site area (in hectares)	Approx. 4 hectares		
Coordinates	Easting	516783	Northing 201694
Site Location Plan Attached	Yes		
GIS mapping shapefile attached (in .shp file format)	No		
Landownership (please include contact details if known)	Evdokia Kontou c/o Archetype Associates Ltd		
Current land use	Undeveloped open field - Green belt land		
Condition of current use (e.g. vacant, derelict)	Vacant		
Suggested land use	<input type="checkbox"/> Housing		
Reasons for suggested development / land use	<ul style="list-style-type: none"> - The proposal site is located on Harper Lane and in close proximity to other Green Belt settlements. Whilst registered as Green Belt, the proposal site is enclosed on all sides, notably by development on the former Harperbury Hospital site to the east, residential properties to the north fronting Harper Lane, wooded area to the south and approx. 18m tall trees to the west. As such it does not contribute to the overall openness of the green belt nor would it's development have significant impact on the outlook from Harper Lane. - The enclosed and undeveloped plot has been targeted with fly tipping and encountered unauthorised occupation. In its current condition, it is not considered to have valuable contribution to the surrounding area and is not suitable for agricultural use. 		

	<ul style="list-style-type: none"> - There is a current short fall in meeting housing targets within the District with the Local Housing Needs Assessment (Sept '20) identifying a need for 893 new units to be delivered per annum. The developer is keen to propose the site for residential use which would provide a notable contribution to the local housing targets within an underused site. - The N.P.P.F states a presumption in favour of sustainable development, taking into consideration the economic, social and environmental objective. Due to the size of the proposal site, residential proposals are capable of delivering units of mixed tenure with supporting amenity and in accordance to the needs of the area. Additionally, its location give opportunity to support the established environmental features such as the TPO woodland, whilst developing the less valued scrubland.
Likely timescale for delivery of suggested development / land use	<input type="checkbox"/> 1-5 Years

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	Yes Cesspit to north eastern corner of site
	Environmental issues (e.g. Tree Presentation Orders; SSSIs)	Yes Woodland TPO to south and east boundaries
	Flood Risk	No - Flood zone 1
	Topography affecting site (land levels, slopes, ground conditions)	Yes Gradual slope across the site
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input type="checkbox"/> Yes Subject to survey – assumed due to proximity of existing neighbouring properties
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input 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 type="checkbox"/> Yes

	Other constraints affecting the site	<input type="checkbox"/> Yes Area of Archaeological Significance (south western corner only) Public Right of Way across the site
Planning Status	<p></p> <p>Please include details of the above choice below (for example planning reference numbers and site history)</p>	
Other comments	None	



SCALE 1:500
 0 5m 20m 40m

Revision	Description	Date

Archetype
 Architects Planners Designers
 3 MANCHESTER SQUARE LONDON WU7 3PB
 Tel: 3666 Fax: 3888
 e-mail:

Project: LAND ADJACENT TO
 HARPERSBURY HOSPITAL WD7 9
 Drawing Title: MASTER PLAN

Drawn: ZD Approved: Scale: 1/500@A1 Date: NOV 18

Drawing No: 1084 - 01 01 Revision:

CAD Ref:

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.

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- 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.

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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	Sophia Thorpe
Company/Organisation	RPS
Address	20 Western Avenue, Milton Park, Abingdon, Oxfordshire
Postcode	OX14 4SH
Telephone	
Email	
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

Site Details			
Requirements:			
<ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) 			
Site address/location (Please provide a map showing the site boundary)	Cherry Hill, Chiswell Green, St Albans, AL2 3AT		
Site area (in hectares)	1.26ha		
Coordinates	Easting	51.730480	Northing -0.364160
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Landownership (please include contact details if known)	C/O agent		
Current land use	Grazing paddock		
Condition of current use (e.g. vacant, derelict)	Maintained grazing paddock		
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)		
Reasons for suggested development / land use	The land is an available, deliverable and achievable greenfield site which is located adjacent to existing residential built form. The site is unconstrained and ideally located to provide much needed market and affordable housing within this existing residential setting.		

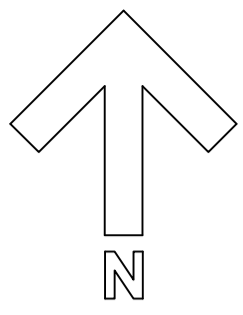
Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years
---	--

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

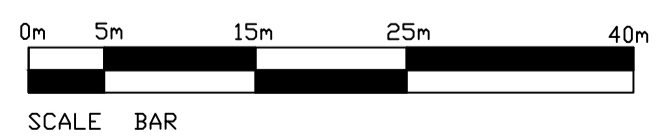
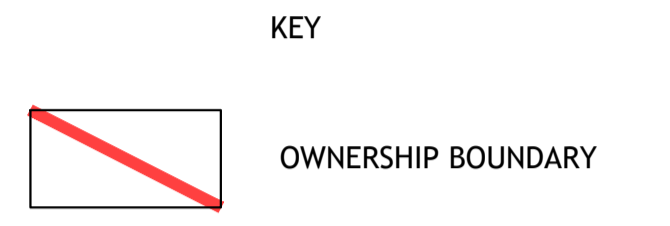
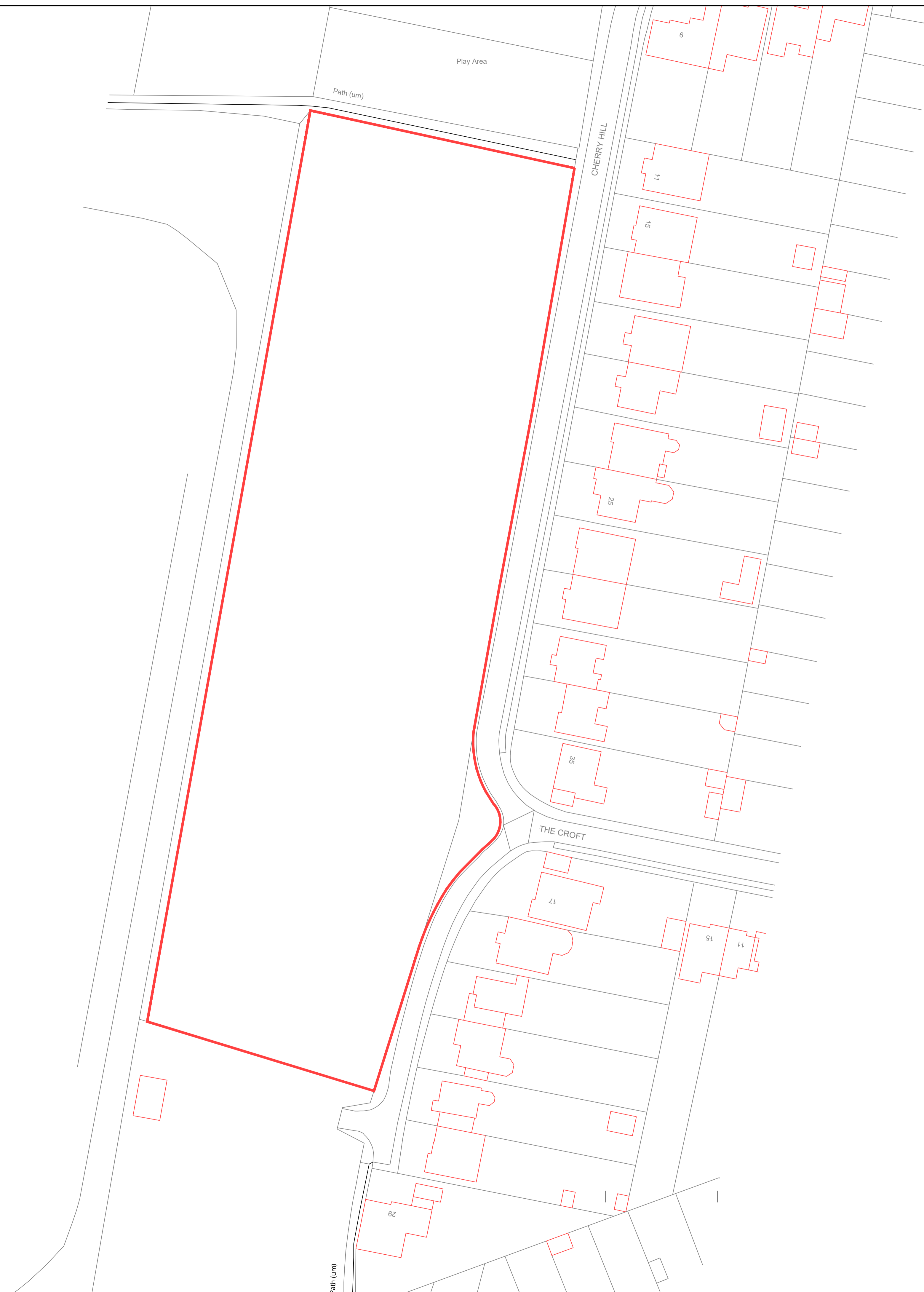
	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No The site is unconstrained with no known reasons why residential development could not be delivered on the site within the 0-3year window.
Planning Status	<input type="checkbox"/> Planning Permission Granted <input checked="" type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history) 5/2012/2461- Fourteen, two storey dwellings with habitable roofspace, garages, terraces, associated access, car parking and landscaping including estate gates and fencing 5/2013/2188- Fourteen, two storey dwellings with habitable roofspace, garages, associated access, car parking and landscaping including estate gates and fencing (resubmission following refusal of 5/2012/2461)Appeal ref. APP/B1930/A/13/2209594 14 residential dwellings.	

Other comments

Please see covering letter




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 E. www.bratherton.co.uk

CHERRY HILL

LOCATION PLAN

DATE • MARCH 2021	SCALE • 1/500 @ A1
DRAWN • MY	REV •
DWG NO. • 1384.3.1	

Our ref: NPI12018 Cherry Hill

20 Western Avenue
Milton Park
Abingdon, Oxfordshire
OX14 4SH
T

Date: 05th March 2021

Planning Policy
St Albans Council Offices
St Peters Street
St Albans
Hertfordshire
AL1 3JE

Dear sir/madam,

Call for sites submission – Land at Cherry Hill, Chiswell Green

On behalf of our client, Sir Martin Holderness, we hereby submit the above mentioned site to the St Albans call for sites (SHLAA) consultation.

This covering letter should be read in combination with the completed call for sites proforma which provides a technical overview of the site to ensure the site is considered comprehensively as part of the present Housing Land Availability Assessment.

Planning policy

The current adopted Local Plan is The District Local Plan Review 1994 (Adopted 30 November 1994) Saved and Deleted Policies Version (July 2020). Any policies not on the saved policies list have time expired and no longer form part of the development plan. With St Albans recently withdrawing their new Local Plan from examination, the council has reverted to their old Local Plan thus placing a reliance on outdated policies from the 1990s.

Due to the reliance on out of date policies and assumptions for meeting housing growth and need, this therefore places further doubt on the delivery of adequate housing and forces development decisions to be based on this outdated Local Plan.

National Planning Policy Framework (February 2019)

The NPPF is the Government's statement of planning policy and guidance which provides the basis against which development plan policies and development control decisions should be made. The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, and at its heart is a presumption in favour of sustainable development.

Paragraph 8 clarifies that in order to achieve sustainable development the planning system must act to reach overarching aims of social, economic and environmental objectives. Each objective is interdependent and need to be pursued in mutually supportive ways to secure net gains across all three objectives to achieve sustainable development.

Paragraph 11 advises that Plans and decisions should apply a presumption in favour of sustainable development. Section c) of paragraph 11 states that for decision-taking this means approving development

Our ref: NPI12018 Cherry Hill

proposals that accord with an up-to-date development plan without delay and, where the development plan is out of date, Councils should grant planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or the application of specific policies suggest otherwise.

Chapter 5 seeks to address delivering a sufficient supply of homes.

Paragraph 63 sets out that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site.

Paragraphs 60 and 61 indicate that housing need assessment must be carried out using the standard method in the national planning guidance and take into account the type, size, tenure and needs of different groups.

Paragraph 64 requires major development involving the provision of housing is proposed, decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement include where the site or proposed development is exclusively for affordable housing (criterion d).

Paragraph 67 requires policy making authorities to have a clear understanding of the land available in their area. From this assessment planning policies should identify a sufficient supply and mix of sites taking into account suitability and likely economic viability to identify a supply of deliverable sites for within 1-5 years of the plan period, and developable sites for years 6-10 and 11-15.

Paragraph 68 recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, and that these are often built-out relatively quickly.

Paragraph 73 requires local planning authorities to annually identify and update, as a minimum, a five-year supply of housing at specific deliverable sites, which meet the housing requirements set out in the adopted strategic policies. A suitable buffer for the housing supply must also be demonstrated, this being either:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the LPA wishes to demonstrate a five year supply of deliverable sites through an annual position statement; or
- c) 20% where there has been significant under delivery of housing over the previous three years (where delivery below 85% of the housing requirement set out in the Housing Delivery Test)

Paragraph 77 of the NPPF states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Paragraph 78 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

In terms of rural housing, **Paragraph 78** states:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

It is noted that the site is located adjacent to an area where residential properties already exist, alongside other, non-residential uses within the rural area. Therefore, there is clear potential for the proposal to help maintain and enhance the vitality of the local community through the provision of affordable, market housing on the site.

Paragraph 103 relates to sustainable transport modes and seeks the promotion of developments that are focused on locations which are or can be made sustainable and offer a genuine choice of transport modes. This aim goes hand in hand with the principles set under Paragraph 118d) which says that planning decision should “*promote and support the development of under-utilised land and buildings, especially if this would*

Our ref: NPI12018 Cherry Hill

help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”.

Paragraph 117 promotes the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 118 criterion D develops this point by stating that planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

Whilst the NPPF has been updated twice since it was first published in 2012, the general policy direction with regards to older people planning remains broadly unchanged. The NPPF maintains the policy that specifically identifies ‘older people’ as one of the key household groups whose needs should be considered in the preparation of plans. It states that,

“...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, **older people**, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)...’ (NPPF, para 61)

It goes on to define ‘older people’ as comprising,

“People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs...” (NPPF, Glossary)

Therefore, national policy clearly recognises that the needs of specific groups encompasses a range and diversity across housing but also the households concerned, especially within the older people’s group.

The ‘Housing for Older and Disabled People’ Planning Policy Guidance (PPG) (26 June 2019) has a section dedicated to providing guidance on how the need for older people’s housing should be considered in the planning process. In response to the first question: (“Why is it important to plan for the housing needs of older people?”) the opening sentence of the guidance on planning for older people states,

*“The need to provide housing for older people is **critical**....”*

And goes on to state in response to the same question,

*“People are living longer lives and the **proportion of older people in the population is increasing**. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. **Offering older people a better choice of accommodation to suit their changing needs** can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, **an understanding of how the ageing population affects housing needs** is something to be considered from the early stages of plan-making **through to decision-taking**....”*

On tackling for the needs of disabled people, the PPG is clear on the role planning in this pursuit,

“The provision of appropriate housing for people with disabilities, including specialist and supported housing, is **crucial** in helping them to live safe and independent lives...**An ageing population will see the numbers of disabled people continuing to increase** and it is important we plan early to meet their needs throughout their lifetime.”

The PPG also now provides specific guidance on how the housing requirements of older (and disabled) people can be determined. The PPG identifies a range of data sources that could help do this, stating that,

Our ref: NPI12018 Cherry Hill

“The age profile of the population can be drawn from Census data. Projections of population and households by age group can also be used. The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people. Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards can also be useful. The assessment of need can also set out the level of need for residential care homes.”

The PPG goes on to define further the different types of specialist accommodation for older and disabled people. Whilst recognising that the types of provision as outlined does not constitute an exhaustive list, the PPG does nonetheless seek to define the range of provision in some detail. Based on the PPG definitions, the different types of specialist housing designed to meet the diverse needs of older people can include;

- Age-restricted general market housing (generally for active over-55s);
- retirement living or sheltered housing;
- ‘extra care’ housing or ‘housing-with-care’ (in some cases, these developments are known as ‘retirement communities’ or ‘retirement villages’; residential care homes and nursing homes (based on based spaces rather than individual dwellings, and can also include dementia care homes).

Therefore, the PPG recognises the significant amount of variability in the types of specialist housing for older people, driven predominantly by the differing levels of care that is required as people grow older. The list above provides an indication of the different types of housing available, but is not definitive, stating that,

“Any single development may contain a range of different types of specialist housing.”

In terms of how planning should consider making specific provision for specialist housing for older people, the PPG states that,

“Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate...Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.”

One notable exception in terms of clarification set out in the PPG 2019 is a lack of any further advice on how to apply the Use Classes Order with respect to specialist accommodation (under Use Class C2) leaving this task to each Local Planning Authority to apply to each case in turn. The PPG states,

“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”

RPS highlights the final part of the response as providing some useful guidance on those matters that could potentially assist applicants in the preparation of specific proposals that seek to respond the local needs in the older population cohort. Furthermore, in determining proposals that seek to address a local need in the area, decision makers should take into account the following guidance when assessing planning applications for specialist housing for older people, as stated in the PPG,

“Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people...Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need”.

Ensuring Housing Delivery and Land Supply

The NPPF requires Local Planning Authorities (LPAs) to maintain an up to date supply of housing land to be delivered over a 5-year period, this is known as 5 Year Land Housing Supply (5YHLS). It is apparent from the Council's updated Annual Monitoring Report (AMR) 2019 (March 2020) 5-year land supply requires the supply of **2,021 dwellings** during the period 2019-20 to 2023-24 which the Council is presently failing to meet, and therefore failing their obligations under the NPPF. The Council's 5-year housing supply is based on two separate methodologies, they are as follows:

'Approach 1 - The Government's consultation proposals within the 'Technical consultation on updates to national planning policy and guidance method' published on 26 October 2018, sets out a standard methodology for the calculation of local housing need. It gives an outcome for the District of an average of 896 new households / dwellings per annum;

Approach 2 - The 2014 based household projection figures were published by the Department for Communities and Local Government (DCLG) on 12 July 2016. They identify for the District a household projection, which can be taken as indicating local housing need of an average of 640 new households / dwellings per annum for the period 2019-2029.'

The Council updated its 5-year land supply schedule from using these methods and considered that at a baseline date of 1 April 2019 and including the relevant 20% buffer, there is approximately:

- 1) NPPF Standard Methodology: Five-year land supply at 896 new dwellings per annum + 20% Buffer = **1.9 years**
- 2) 2014-based ONS Household Projections: Five-year land supply at 640 new dwellings per annum + 20% Buffer = **2.6 years**

This housing supply reveals the severity of under delivery of housing within St Albans. The Council are unable to meet the required rate of delivery by a significant amount. Whilst a park home is considered sui generis under the Town and Country Planning Act 'Use Classes Order', their delivery can still contribute to the Council's housing land supply. In our opinion, given that the proposal seeks the provision of housing, within the context of a recently submitted new Local Plan it is submitted that all further contributions to towards meeting the District's inadequate 5YHLS should be considered beneficial to the Council to meet their housing supply whilst also working to address unmet need in the absence of any new housing allocations.

In addition to this, Housing Delivery Test Results were published by the Secretary of State on 19th February 2019. The Council scored 58% and in response to this, the Council has produced this Housing Delivery Test Action Plan, responding positively to the challenge of increasing its housing delivery. This figure is considerably short of the 95% requirement and therefore showcases that there is a specific need to identify areas for housing.

However, the Council's LHNA states that the 'identified need for affordable home ownership properties equates to around 30% of the overall housing need' (4,043 per annum). In examining the cost for low-cost home ownership products, the preferred approach in this report is to set out a series of affordable purchase costs for different sizes of accommodation. These are set out in table 47 of the LHNA as a range with the bottom end being based on equivalising the private rent figures into a house price so that the market sale price will meet the needs of all households in the gap between buying and renting. The upper level is set based on the estimated lower quartile price to buy a market home. Setting higher prices would mean that such housing would not be available to households for whom the Government is seeking to provide an 'affordable' market option.

The LHNA sets out that for market housing, households currently have an element of choice but with worsening affordability, this causes families to buy smaller homes than they might traditionally have been expected to do. To give an example, paragraph 6.100 sets out that 'a middle-income household might previously have sought a 3-bedroom semidetached home. However, worsening affordability and stricter lending practice might now mean that such households will only be in the market for say a 2-bedroom flat'. With a limited amount of supply and a high demand for housing in St Albans this therefore shows the prevalent issue of market affordability and the effect of limited incoming housing supply may restrict residents

Our ref: NPI12018 Cherry Hill

from moving up the property ladder whilst economically active, but may also require the over 55s demographic cohort to downsize to a more affordable market housing product in anticipation of financial constraints associated with their retirement.

The Councils LHNA states that 'bungalows are often the first choice for older people seeking suitable accommodation in later life and there is generally a high demand for such accommodation when it becomes available'. Park homes are extremely similar to bungalows as they are single storey detached home (bungalow-style) that are set in a private estate, where they are situated on standard plots also referred to as pitches. Externally and aesthetically, there is very little difference in appearance between a residential park home and a traditional bungalow as parking and amenity space is provided in accordance with caravan model standards. Park homes are perfect for age restriction as they can accommodate the requirements of older occupants who may have reduced mobility.

Based upon a review of the Councils own evidence base including the LHNA, there is clearly considerable potential in St Albans amongst existing households to downsize to smaller properties, when new smaller units are delivered thus releasing larger stock for families and other household looking to access a new home. This is particularly evident amongst those owner occupiers in the older age group cohort, who are more likely to own their homes outright, providing an opportunity for downsizing to properties that better suit their needs in later years.

Suitability of the site

The site is being promoted to this call for sites consultation as an available, achievable and deliverable site for residential development in the form of up to 30no. residential park homes as a market affordable housing product. The land is put forward to this call for sites as an immediately available site to deliver much needed homes to met unmet need. The site benefits from connectivity with all services and amenities to facilitate development, and there are no constraints to delivery.

The land measuring approximately 1.26ha is located on the western side of Cherry Hill, within the context of an established residential area on the western edge of Chiswell Green.

The greenfield site benefits from a considerable highway frontage onto Cherry Hill which presently provides full vehicular and pedestrian access to the existing built form fronting and accessed from Cherry Hill. The site is bounded by open countryside to the west, with a PRoW to the north with a play ground beyond. To the south the site is bounded by pony paddocks.

Park homes are designed for permanent living and are a cheaper market affordable product due to the lower construction costs compared to conventional homes, thus addressing the prevalent issue of affordability within St Albans. Furthermore, as park homes are cheaper to purchase, this will allow the occupants to have additional disposable income which can be used in the local area, when compared to purchasing an open market bungalow.

Although the site is not located within the defined settlement boundary, the site can meet much of the criteria set out in policy 4 (new housing development in towns) due to its location adjacent to the settlement boundary of Chiswell Green and proximity to St Albans.

As the whole edge of settlement site will be age restricted this will be similar to retirement village which will attract the older residents. This therefore produces a secure and safe residential area with a like-minded community of senior residents whilst providing the convenience of nearby services, amenities and public transport infrastructure. The delivery of this type of age restricted community may also help to combat elderly loneliness and isolation which negatively affects physical and emotional wellness.

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It is recognised that the site is located outside of the confines of a named settlement in Policy 2 within the St Albans Local Plan; however, it is our view that the proposal for park home bungalows on this sustainable edge of settlement site provides a suitable and deliverable location for the proposed dwellings in accordance with policies within section 3 of the Local Plan relating to housing by virtue of its pedestrian connectivity and access to bus services via nearby bus stops provides access to higher order services in larger towns including Luton, Watford and St Albans. As such, it is our view that this site should be considered favourably as part of this call for sites consultation as an available site to deliver market affordable housing.

The existing connectivity with services and infrastructure within Chiswell Green offers residents access to multiple modes of sustainable travel, thus reducing their dependency on car journeys. Consequently, whilst being located outside of the settlement boundary, the location does allow access to sustainable modes of transport and pedestrian connectivity to local services within Chiswell Green to meet day to day needs, and further afield for higher order services.

The proposal are considered sustainable in terms of social, economic, and environmental benefits by making the efficient use of this sustainable site by delivering an attractive scheme comprising much needed smaller market affordable homes to meet an identified housing need for the identified age group cohort where the benefits of the scheme outweigh any harm to planning policies or the Green Belt.

In conclusion the site is located within a sustainable location adjacent to the settlement boundary with the capability to deliver much needed market affordable housing within the 1 – 5 year period of the Local Plan. The site is immediately available and is demonstrable as an achievable and deliverable site for housing to meet the tests set out within the Local Plan.

Yours sincerely,
for RPS Consulting Services Ltd

Sophia Thorpe MRTPI
Director and Residential Lead - Planning

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.