

degree of consistency with it. Policy 1 should therefore carry little weight in the decision-making process.

- 5.19. Policy S3 (Metropolitan Green Belt) of the emerging Local Plan seeks to protect the Green Belt from inappropriate development. Inappropriate development is defined in the NPPF and the proposed development which constitutes the redevelopment of previously developed land is an exception to this.
- 5.20. The Pre-Application Advice raises questions about the history of the Wildlife Breeding Centre and in particular the planning status of the existing buildings. and states that insufficient information has been provided. The Wildlife Breeding Centre was granted planning permission (5/1975/0646) in August 1975. The business traded up until 2017 and we are informed that the buildings and enclosures in question have been on the site and in use by the centre for many years, up until it ceased trading, and was purchased by our client.
- 5.21. The earliest aerial photograph in the public domain shows the buildings in situ in 1999. Therefore, as a simple matter of fact and degree the buildings must be lawful by virtue of time and are immune from enforcement action. The photographic evidence and their presence onsite, is sufficient to reach this conclusion.
- 5.22. The sites lawful use as a Wildlife Breeding Centre is sui generis so the site and buildings constitute previously developed land as a matter of fact. It can therefore not be argued that the proposal constitutes inappropriate development, as the development of previously developed land is an exception as stated in NPPF Paragraph 145 (g).
- 5.23. NPPF Paragraph 145 also requires that “the redevelopment does not have a greater impact on the openness of the Green Belt” than the existing development. The floor area of the proposed dwelling measures 280 sqm as indicated on drawing P20.
- 5.24. The proposed development includes the demolition of two substantial buildings, the structural status of which is set out in the accompanying Structural Report. The floorspace of these buildings’ totals 284 sqm which is higher than that of the proposed dwelling.



The substantial buildings are denoted as A, B, C, D and E on the above topographic survey.

- 5.25. In addition, numerous cages, enclosures and other dilapidated structures associated with the Wildlife Breeding Centre will be removed as part of the proposed development. These have not been included in the calculation of existing floorspace as they are not substantial. However, they are existing structures within the Green Belt and their removal will result in a reduction of built form on the site as well as significant environmental enhancements, both of which make a positive contribution to the openness of the Green Belt. The Applicant has also already removed numerous sheds, cages, and enclosures as part of a general programme of site clearance in order to enhance its appearance. This has also had the benefit of further increasing the openness of the Green Belt.
- 5.26. The Supplementary Planning Guidance Document Residential Extensions And Replacement Dwellings In The Green Belt (2004) provides guidance on development in the Green Belt. Although this proposal does not comprise the replacement of a dwelling, the objectives and guidance set out in this document are valid as the proposal will replace existing buildings and structures with a new dwelling.
- 5.27. The Guidance states that an increase in volume in the range of 90 – 180 cubic metres would be acceptable. The cubic content of the existing substantial buildings is 866 cubic metres. Using the guidance as benchmark for assessing an increase in volume through redevelopment, there would appear to be a notional allowance of

1046 cubic metres for the new structure. However, this is guidance only and not policy, and as such should be considered in the round, with other issues such as architectural form and the appropriateness of the design.

- 5.28. The proposed development measures a total volume of approximately 1176 cubic metres which is 11% above that set out in the Guidance. As paragraph 6.3 of the Guidance states that *“It seems clear that each case needs to be addressed on all its individual merits rather than just applying a maximum percentage figure.”* A balanced judgement therefore needs to be made with regards to the impact of the additional volume on the openness of the Green Belt rather than applying the suggested increases arbitrarily. As such, the Guidance has been used in the round to direct the overall scale of development.
- 5.29. The Guidance also suggests that an increase in floorspace of 20-40% would be acceptable, subject to a maximum increase in cubic content of 300 cubic metres. In this case, no additional floorspace is proposed but a 300 cubic metre increase in volume over the existing substantial buildings would total 1166 cubic metres. As the proposed volume is only 10 cubic metres higher than this, the difference would be negligible and would not have a greater material impact on the openness of the Green Belt.
- 5.30. With regards to the less substantial structures proposed for demolition and removal, there will be a considerable reduction in the amount of built form on the site due to the clearance of additional cages and dilapidated structures on top of the removal of the substantial buildings, and this should attract weight in the planning balance. The cages and dilapidated structures have a total floorspace of 172 sqm, and a total volume of 269 cubic metres. The additional volume should therefore be offset against the reduction in built form.
- 5.31. As you will observe, this additional volume is primarily as a result of the existing structures having shallow pitched roofs, whereas the proposed dwelling will have more traditional dual pitched roofs. The roofscapes therefore result in an increase in volume by the very nature of the geometry, but at the same time the roof structures are arguably the most appropriate aesthetic for this location. The site is also well screened by mature landscaping and the proposed dwelling will not be visible outside of the site so the increased pitch of the roofs will not cause any harm to the openness of the Green Belt.

- 5.32. The proposed development will be contained in one part of the site, located on the footprint of those buildings to be demolished; and the remainder of the previously developed area will be put back to ancillary landscaping. Furthermore, as the land is subject to clearance there is an opportunity to achieve an extensive biodiversity gain through landscaping and habitat creation including the planting of specimen trees. This also attracts weight in the planning balance.

#### Summary

- 5.33. To summarise the policy position, it has been demonstrated that the site constitutes previously developed land so the proposed development of the site would be an exception to inappropriate development in the Green Belt as set out in NPPF Paragraph 145 (g).
- 5.34. The proposal meets the objectives of the SPG on development in the Green Belt in the round, and will result in improvements to its openness through the removal of numerous buildings, cages, and dilapidated structures. The proposal will also result in a significant environmental enhancement of the site which will increase the visual amenity value of this part of the Green Belt.
- 5.35. It is our contention that the proposed development is policy compliant and therefore acceptable in principle.

## DESIGN

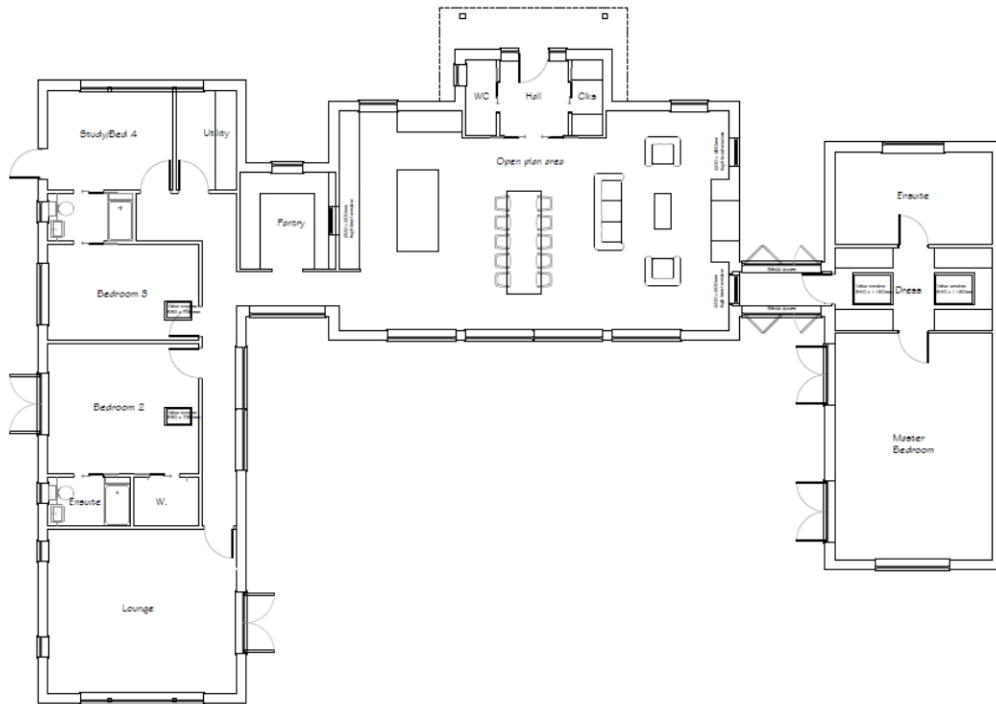


Front Elevation



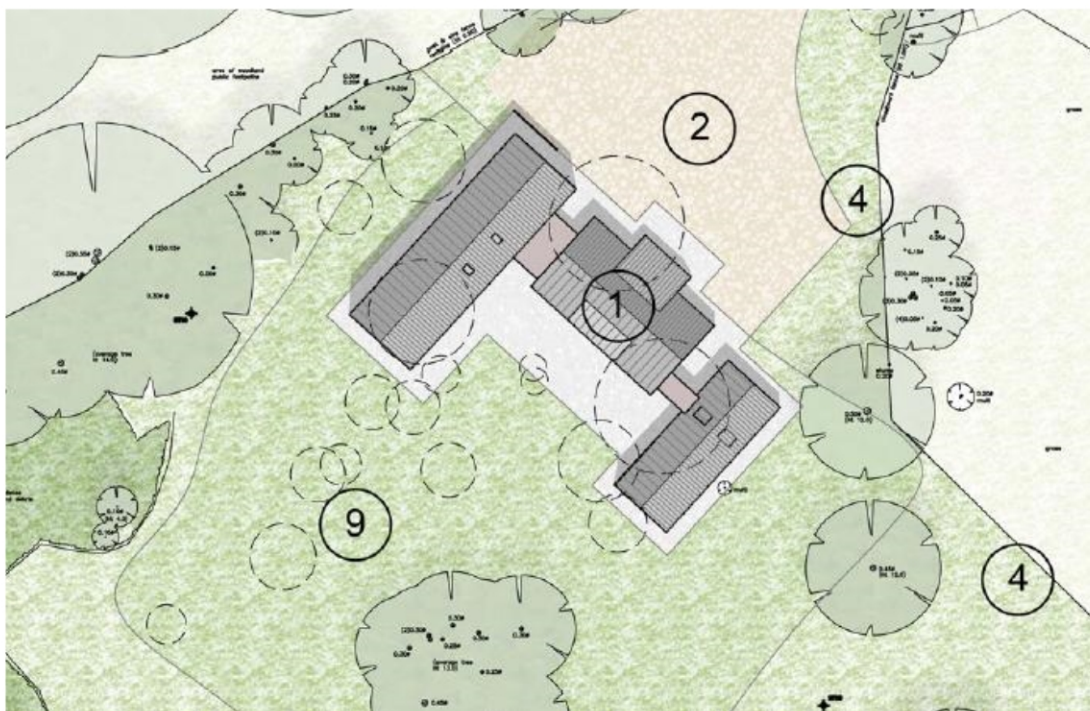
Rear Elevation

- 5.36. The proposal is a single storey dwelling. The architectural approach seeks to deliver a barn style complex of linked pods, with varying ridge heights. The form adopted enables high ceilings and spaciousness within the main habitable spaces. The windows in the roof provide additional high-level light to the living accommodation and add to the sense of internal height.
- 5.37. The dwelling has a spacious open plan living area comprising of a kitchen, dining area, and sitting area. There are four bedrooms and an additional room which can either serve as a study or a fifth bedroom – all contained in separate wings.



Floor Plan

- 5.38. The proposed dwelling will be constructed from a high-quality natural timber cladding which is sensitive to this rural location. The dwelling will be well screened by the numerous mature trees on the site and around the boundaries.



Site Layout Plan

## AMENITY

- 5.39. There are some trees and planting in between the location of the proposed dwelling and Bowersbury Farm. It is also proposed to erect a fence and additional boundary landscaping to provide further screening between the two properties. It is not considered that there will be any amenity issues between the two dwellings due to the substantial separation distances, location of windows, and landscaping.
- 5.40. There is a dwelling on the neighbouring site to the east. The site is well screened by mature planting. The proposed development will not be visible from this dwelling and will not therefore cause any adverse impacts on amenity.

## STRUCTURAL SURVEY

- 5.41. A Structural Survey has been undertaken by a qualified engineer at Bespoke Basements. The report confirms that a structural analysis was carried out on the major elements of the substantial buildings including the rafters, posts, and walls, and concludes that they are structurally sound.

## ECOLOGY

- 5.42. A Preliminary Ecological Appraisal has been undertaken by Indigo Surveys. The main findings of the report are summarised below.
- 5.43. The Appraisal concluded that the site is of very limited value to wildlife. No old or in-use birds' nests were found but there is some potential for nesting birds in the trees and hedgerows. None of the trees or buildings were considered suitable for bat roosting or hibernation. The site has low to moderate value for foraging bats around the woodland edge and boundary hedgerows but none of these elements will be affected by the proposed development. There was no evidence of badgers. The site is considered unsuitable for otters, water voles, amphibians, and reptiles.
- 5.44. Indigo Surveys have made a series of recommendations to mitigate the impacts of the proposed development on the site's ecology. This includes undertaking any works which may affect a bird's nest outside of March to August, or undertaking a close inspection prior to clearance; care taken when undertaking earthworks to

avoid harm to small mammals; and escape routes provided in open trenches to enable any wildlife to escape.

- 5.45. The proposal will result in significant site clearance, opening up the land to form a new landscaped parkland setting. The vast area of land available offers substantial opportunities for improved habitat management, enabling a net gain in biodiversity.

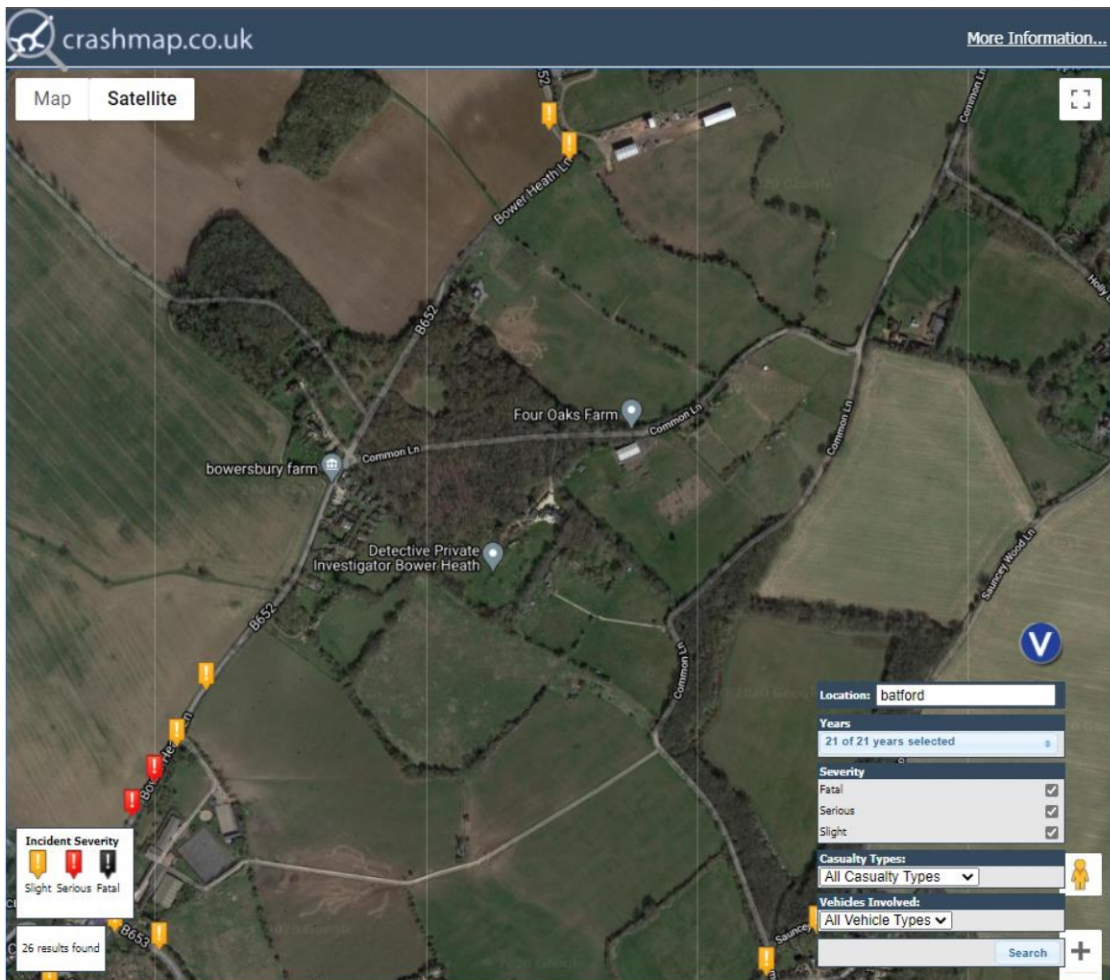
## TREES

- 5.46. A Tree Survey Assessment has been undertaken by Indigo Surveys. The main findings of the report are summarised below.
- 5.47. No Class A (High Quality) or Class B (Moderate Quality) trees are to be removed, but several Class C (Low Quality) trees require removal to facilitate the proposed development. It is also recommended to remove two Class U (Unsuitable For Retention) trees for arboricultural reasons.
- 5.48. Indigo Surveys acknowledge that the removal of the trees or vegetation may initially have an impact on the green cover, but assess that they will have no impact on the long-term amenity of the site. They also recognise that the scheme presents a significant opportunity for enhancement to amenity and biodiversity through the selection of native species.
- 5.49. Indigo Surveys have made a number of recommendations to protect the trees during the construction phase. This includes all tree works being completed prior to development; the use of protective barrier fencing and fenced off construction exclusion zones where necessary; and ground works to avoid breaching root protection areas.

## ACCESS & PARKING

- 5.50. The site is accessed via Common Lane. The existing access track, has served the house and Wildlife Breeding Centre business during the past 45 years. The visibility splays have been adequate for the site's operation, and demonstrated via the following extract from CrashMap, there have been no recorded incidents on Common Lane in the past 21 years. The access would therefore appear to be functioning safely.





CrashMap extract

- 5.51. The access has a wide bell mouth forming a priority junction. At the entrance two cars can pass. The driveway then narrows requiring cars to give way at either end of the drive. Drivers using the access have clear line of sight to facilitate a give way arrangement.
- 5.52. The access drive widens as you enter the site and this is shared with Bowersbury Farm.
- 5.53. There is ample space on site to be able to provide a level of parking which meets the Council's standards. There is space to accommodate fire tender access, and turning within the site – please refer to drawings P20 and P21.
- 5.54. Refuse and recycling storage is kept on plot and is taken to the highway on collection day. This is an existing arrangement.

## 6.0 THE PLANNING BALANCE

- 6.1. The proposal is for the demolition of outbuildings and structures associated with a Wildlife Breeding Centre, and the erection of a dwelling.
- 6.2. The Council are unable to demonstrate a five-year supply of housing land. As the proposal is defined in policy as an exception to inappropriate development in the Green Belt, paragraph 11 (d) is triggered and the tilted balance is engaged; therefore, development must be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The proposal meets the three strands of sustainable development – social, economic, and environmental, and the presumption in favour applies.
- 6.3. The site comprises of previously developed land, and so the proposed development constitutes an exception to inappropriate development in the Green Belt as set out in NPPF Paragraph 145 (g). The proposal meets the objectives of the SPG on development in the Green Belt in the round, and will result in improvements to its openness through the removal of numerous buildings, cages, and dilapidated structures. The redevelopment will have no greater impact on the openness of the Green Belt, and therefore the proposal is acceptable in principle.
- 6.4. The architectural approach seeks to deliver a barn style complex of linked pods, with varying ridge heights. The dwelling will be constructed from high quality natural timber cladding which is sensitive to this rural location. The dwelling will be well screened by the numerous mature trees on the site and around the boundaries and it will not be visible outside of the site. The applicant is committed to the highest standards of sustainable construction and will deliver a building that exceeds the requirements of Approved Document part L1A.
- 6.5. There is sufficient separation and screening with neighbouring properties to ensure there will be no issues with regards to amenity. It is also proposed to erect a fence and additional boundary landscaping between the proposed dwelling and Bowersbury Farm to provide further screening.

- 6.6. The Structural Survey confirms that a structural analysis was carried out on the major elements of the buildings including the rafters, posts, and walls, and concludes that they are structurally sound.
- 6.7. The Preliminary Ecological Appraisal found that the site is of limited value to wildlife, and makes a series of recommendations to mitigate the impacts of the proposed development on the site's ecology. There are significant opportunities for biodiversity enhancements and habitat management to deliver a net biodiversity gain.
- 6.8. The Tree Report confirms that several Class C (Low Quality) trees require removal to facilitate the proposed development. The report highlights that the scheme presents a significant opportunity for enhancement to amenity and biodiversity through the selection of native species.
- 6.9. The proposal will utilise the existing access onto Common Lane which has adequate visibility in both directions. There is ample space on site to be able to provide a level of parking which meets the Council's standards.
- 6.10. We therefore commend these proposals to the Council, and kindly request that planning permission is granted.



Phillips Planning Services Ltd.  
Town Planning and Development Consultants

**THE WILDLIFE BREEDING CENTRE, BOWERSBURY FARM**  
BOWERS HEATH, HARPENDEN

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

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

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

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

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

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

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

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

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

**Please do not submit sites that:**

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

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

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

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

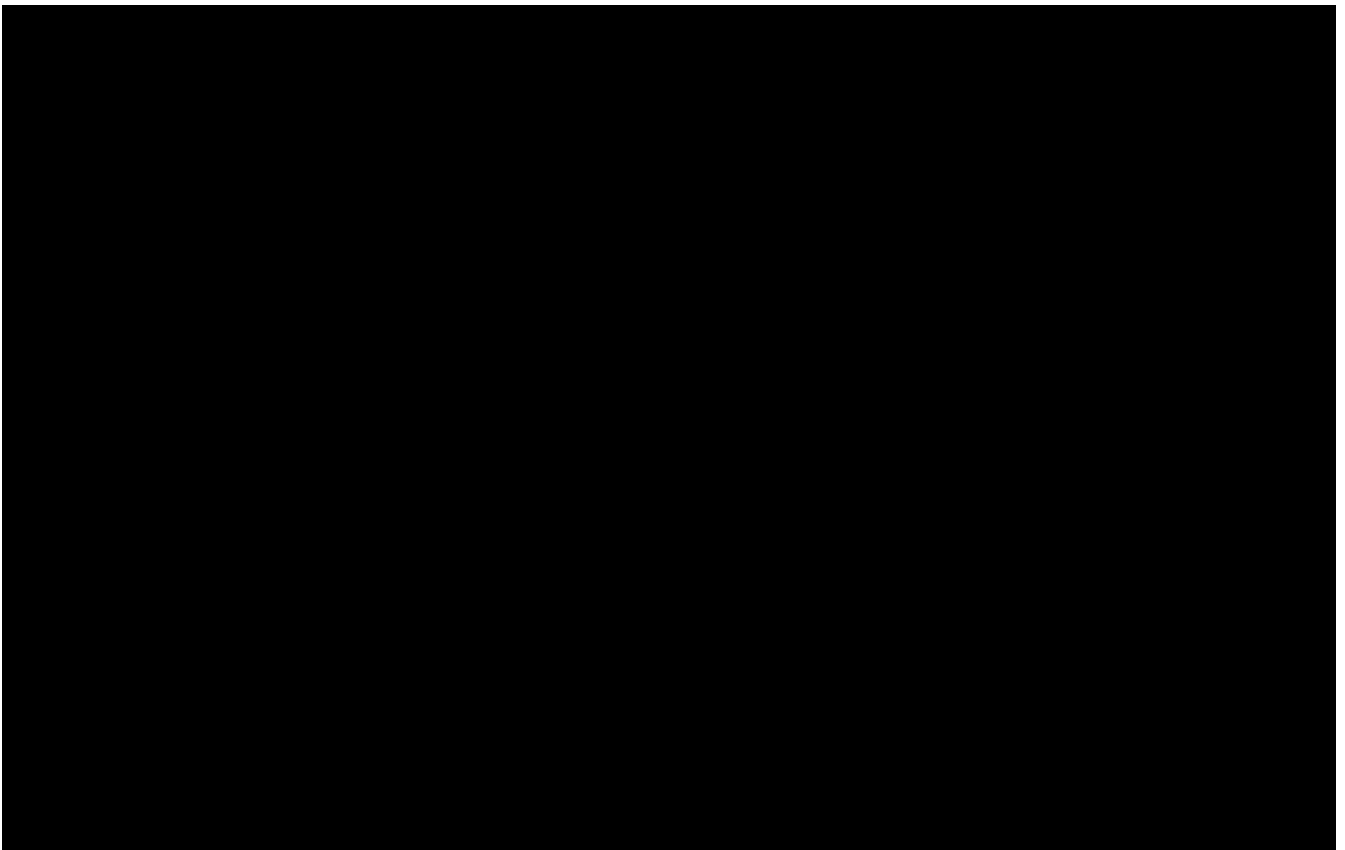
**By online consultation portal:**

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

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

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

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



<b>Site Details</b>			
<b>Requirements:</b>			
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>			
Site address/location (Please provide a map showing the site boundary)	Harpenden Sewage Treatment Works Piggottshill Lane Harpenden AL5 5UN		
Site area (in hectares)	5.76		
Coordinates	<b>Easting</b>	514986	<b>Northing</b> 214522
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)	Thames Water Utilities Limited		
Current land use	Sewage Treatment Works		
Condition of current use (e.g. vacant, derelict)	Operational sewage treatment works.		
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input checked="" type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify)		
Reasons for suggested development / land use	See cover letter.		

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



	Other constraints affecting the site	<input checked="" type="checkbox"/> Yes (If yes, please specify) <input type="checkbox"/> No The site is an operational sewage treatment works
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input checked="" type="checkbox"/> Other  Please include details of the above choice below (for example planning reference numbers and site history)  Upgrades of the works will be necessary to deliver environmental improvements and support growth in the catchment. An opportunity could arise for redevelopment if the relocation of the works to an alternative site were to be viable. Future upgrades of the site could also render areas of the land surplus to requirements and available for development.	
Other comments	The site is a developed site within the Green Belt on the edge of the urban settlement of Harpenden. The removal of the site from the Green Belt would remove a constraint to development of essential infrastructure on the site. In addition, there may be future opportunities for the relocation of the sewage treatment works which could release the existing developed site for development. Further information is provided in the cover letter.	