

# Sustainability Appraisal (SA) of the St Albans Local Plan

SA Report

September 2024



**Quality information:**

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# 1 Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging St Albans City and District Local Plan (“St Albans Local Plan”) being prepared by St Albans City and District Council.
- 1.1.2 Once adopted, the Plan will set the strategy for growth and change for the District up to 2041, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.<sup>1</sup>

## 1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives”. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
- What has Plan-making / SA involved **up to this point**?
    - including appraisal of ‘reasonable alternatives’
  - What are the SA findings **at this stage**?
    - i.e. in relation to the draft plan
  - What are **next steps**?

## 1.3 This SA Report

- 1.3.1 Following a draft plan consultation in 2023, the Council has now prepared the final draft (‘proposed submission’) version of the plan for ‘publication’ under Regulation 19 of the Local Planning Regulations.
- 1.3.2 As such, this is the formal SA report. It presents an appraisal of “the plan and reasonable alternatives”, along with other prescribed information, aimed at informing representations and plan finalisation.<sup>2</sup>

### Structure of this report

- 1.3.3 This report is structured in **three parts** in order to answer the questions above in turn.
- 1.3.4 Before answering the first question there is a need for two further introductory sections:
- Section 2 – introduces the plan scope.
  - Section 3 – introduces the SA scope.
- 1.3.5 It should be noted that this report is structured identically to the Interim SA Report from 2023.

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<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

<sup>2</sup> See **Appendix I** for a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

## 2 The plan scope

### 2.1 Introduction

2.1.1 The aim here is to briefly introduce the: context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the ‘plan scope’).

### 2.2 Context

2.2.1 There is **wide-ranging context** to plan preparation, which translates into a series of plan objectives, as discussed below. For example, and very notably, responding to the **climate emergency** is arguably a foremost objective nationally (providing context) and locally (as translated through the plan objectives).

2.2.2 However, a key matter for consideration here is the context provided by NPPF paragraph 11, which sets out a **presumption in favour of sustainable development**. The District has been subject to ‘the presumption’ over recent years because of inadequate housing land supply, and the way to address this is through a Local Plan that identifies a land supply (National Planning Policy Framework, NPPF, para 69).

2.2.3 Specifically, over a number of years the Council has been unable to demonstrate a five year housing land supply (5YHLS) as measured against housing need (calculated using the Government’s standard method, because the housing requirement in the adopted Local Plan is out of date) and has been found to perform poorly against the Government’s Housing Delivery Test (HDT). Since publication of a Draft Local Plan in 2023 (and in light of the new NPPF, 2023) the requirement is for the Council to be able to demonstrate a 4YHLS, but there nonetheless remains a risk of the Council being subject to the presumption.

2.2.4 The implication is that it becomes more difficult to defend refusal of planning applications at appeal, because the Inspector overseeing the appeal will apply the presumption, which can otherwise be thought of as a ‘tilted balance’ in favour of development. Constraints to development including the Green Belt are still weighed in the balance, but particular weight is given to the benefits associated with development.

2.2.5 The presumption / tilted balance has led to the Council receiving an unprecedented number of planning applications for sites in the Green Belt over recent years, and a number of appeals against refusals for significant housing developments in the Green Belt have been lost. Over recent months this has included three sites at Chiswell Green (considered across two appeals), none of which were allocations in the Draft Local Plan (2023), and which together will deliver 774 homes at a lower tier settlement.

2.2.6 The effect of sites gaining planning permission under the presumption will be to improve the District’s housing land supply position. However, there is little reason to assume that the presumption will not continue to apply as part of decision-making and appeals moving forward in the short term.

2.2.7 The following are select quotes from the joint appeal decision for two sites to the west of Chiswell Green:

- “The Secretary of State agrees with the Inspector that there is a very substantial need for housing in the district which is persistently going unmet, that the Local Plan housing requirement is hopelessly out of date, and that, using the standard method, the Council can demonstrate just a two-year housing land supply at best. He also notes that the latest HDT has been failed by some margin. Therefore, the presumption in favour of sustainable development is triggered...”
- “The most recent Local Housing Needs Assessment (2020) identified a need for 13,248 affordable dwellings during the period of 2020-2036, equivalent to 828 per annum.... The Council’s estimated supply of affordable housing up to 2027 is just 39 dwellings per annum...”
- “Various attempts have been made to replace the existing [Local Plan] but all have failed to date and whilst a further attempt is now being made... Even the Council accepts that there is no early prospect of the housing land supply deficit being addressed. The situation is dire.”
- “Chiswell Green is a village, where such opportunities are likely to be fewer, but there are numerous opportunities for sustainable travel, including a vast array of services and facilities within... 2km...”

2.2.8 The following are select quotes from the most recent appeal decision, for a smaller site to the north:

- “I give no weight to the suggestion that housing land supply is merely a theoretical construct... It is clearly the basis on which national policy around housing is founded...”
- “It has been suggested to me that housing and any attendant benefits are not particularly unusual or special, sufficient for them as other considerations to clearly outweigh any harm to the Green Belt. However, to my mind, given the parlous state of both housing land supply and delivery in this area, new housing does appear to be both so vanishingly rare and in such great need that the provision of it must attract significant weight... National policy is clear that failure in both supply and delivery engages policy mechanisms to restore supply and to achieve the Government’s objective of [boosting housing].”
- “... despite suggestions that there will... be a plan-led solution, there is little short-term prospect....”

2.2.9 Because of this, there is an **urgent need to adopt a new Local Plan**. Once adopted there will be a 5YHLS as measured against the defined housing requirement defined within the plan, and there should be good potential to maintain a ‘rolling’ 5YHLS over time (albeit under the 2023 NPPF there is no requirement to maintain a 5YHLS where plans are less than five years old). Of course, and more generally, the identified supply in the plan will be ‘plan-led’ such that the sites align with the plan objectives, both individually and in-combination. In contrast, ‘planning by appeal’ can lead to sub-optimal growth.

2.2.10 Furthermore, there is an urgent need to progress with the committed Local Plan timetable in light of an Intervention Letter received from the Secretary of State for Housing Communities and Local Government in December 2023. Specifically, the committed timetable involves publication of the Proposed Submission Local Plan in October 2024 and then submission in March 2025. The risk is that delay to this timetable could see the Government intervening to reduce or remove local control over the plan-making process.

2.2.11 Finally, there is an urgent need to adopt a new Local Plan simply because the adopted plan dates from 1994. This makes it currently the second oldest Local Plan nationally, and there is an expectation of it soon becoming the oldest (once the York Local Plan is adopted). As well as a lack of plan-led land supply, it is also clearly the case that the plan is out of date in some wider respects.

2.2.12 This is key context for the local plan and SA process. In turn, a key question is: *What are the key things that need to happen in order to progress a plan to adoption without delay?* The answer to this question is obviously multi-faceted, but **NPPF paragraph 11** provides an important starting point. It states that:

- “all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

2.2.13 Essentially, there is a need to positively **strike a balance** between development needs and constraints to development. Also, as part of this process of striking a balance, there is a need to consider the implications of any unmet housing need that might be generated (by setting the housing requirement at a figure below defined need) and any unmet need not provided for (noting that two or three neighbouring local authorities in South West Hertfordshire are proposing to generate significant unmet need). In order to strike a balance there is a need to explore reasonable alternatives, and that is the focus of Part 1.

## The Draft NPPF (July 2024)

2.2.14 The plan is being prepared under the 2023 NPPF. Whilst a new draft version of the NPPF was published for consultation on 30<sup>th</sup> July 2024, and its direction of travel is acknowledged (also read in the context of a broader understanding of the Government’s direction of travel in respect of planning reform), the Draft NPPF sets out ‘transitional arrangements’ for advanced local plans such as the St Albans Local Plan.

2.2.15 Also, it is acknowledged that alongside the new Draft NPPF the Government is proposing a new standard method, which would see the Borough’s LHN figure rise by 75% to 1,544 dpa (~23,000 homes over a 15 year plan period). Neighbouring authorities have also seen a rise in LHN, with implications for the matter of planning for unmet need across the sub-region, although not as significant St Albans’ 75% increase.

- 2.2.16 It is also important to recognise that the new Draft NPPF proposes to amend national policy in respect of 'decision-taking' (i.e. determining planning applications), which will likely have a significant bearing on St Albans District from the point at which the new NPPF is adopted (late 2024). In particular, the likelihood (on the basis of the current draft version of the NPPF) is that there will be a requirement to demonstrate a five year housing land supply (5YHLS) against the new standard method LHN figure, as opposed to a 4YHLS (the current situation, due to the Council having consulted on a Draft Local Plan, as discussed).

## 2.3 The plan area

- 2.3.1 St Albans City and District lies within the south west of the county of Hertfordshire. To the west is Dacorum Borough, including Hemel Hempstead (which abuts St Albans District) and an extensive area designated as part of the Chilterns National Landscape (formerly AONB), where a boundary review is underway. To the south are three authorities linked closely to the London suburbs and which, together with St Albans and Dacorum, form the South West Herts sub-region, namely Watford, Three Rivers and Hertsmere.
- 2.3.2 The District also links closely with the North East and Central (NEC) Hertfordshire authorities to the east and northeast. In particular, St Albans itself links closely to Hatfield, which falls within Welwyn Hatfield Borough. There are also close links to Bedfordshire, in particular to Luton, which is closely linked to St Albans District via major north-south transport links, including the M1 and the Midland Mainline.
- 2.3.3 St Albans itself is the largest settlement and is located in the central southern part of the District. To the south of St Albans is London Colney and a cluster of closely linked smaller settlements, as well as a high density of transport infrastructure, including the M25. This is also the location of a Government permitted Strategic Rail Freight Interchange (SRFI; see [www.stalbans.gov.uk/strategic-rail-freight-interchange](http://www.stalbans.gov.uk/strategic-rail-freight-interchange)) that is expected to be delivered in the plan period, alongside new strategic transport and green infrastructure.
- 2.3.4 The part of the District to the north of St Albans is then more rural, associated with Harpenden and the villages of Redbourn and Wheathampstead. Finally, by way of orientation, there is a need to emphasise the close ties between the western extent of the District and Hemel Hempstead, which is within Dacorum. The District boundary currently defines the eastern edge of Hemel Hempstead, but there are proposals for a major expansion into the District (broadly as far as the M1, with a greenspace buffer to Redbourn). This expansion into the District would form roughly one half of a wider programme of strategic expansion known as Hemel Garden Communities which consists of around 11,000 homes and 10,000 jobs by 2050 (referred to below as HGC; see [www.stalbans.gov.uk/hemel-garden-communities](http://www.stalbans.gov.uk/hemel-garden-communities)).
- 2.3.5 The entire District falls within the London Metropolitan Green Belt, which is a constraint to growth. There are also a wide range of other important constraints to growth that must be taken into account as part of plan-making, but two potentially stand-out. Firstly, there is a high density of conservation areas (19 in total) and listed buildings (over 800) and St Albans itself is renowned for the Roman Town of Verulamium and St Albans Cathedral. Secondly, a 12.6km zone of influence surrounds Ashridge Woods and Commons Site of Special Scientific Interest (SSSI), in Dacorum Borough, within which there are strict restrictions / requirements placed on housing growth. There is also a high-quality natural environment more widely (including valued chalk streams/rivers) and infrastructure capacity is another constraint to growth locally.
- 2.3.6 The 2021 Census showed the population of the District to be 148,200, an increase of approximately 6% since 2011. The local population is ageing, in line with the national picture, but there is a comparatively good mix of ages reflecting good potential to commute to London, given good access to employment more locally and also given popular schools. In terms of ethnicity, the majority of the population is White British, with Asian/ Asian British as the second largest category at 8% and Black/ Black British around 2%.
- 2.3.7 Overall the District is very affluent, ranking as the 12<sup>th</sup> least deprived local authority nationally (out of 317) according to the Index of Multiple Deprivation (2019). However, house prices are so high – averaging £619,567 – that housing is unaffordable for many, let alone for those who are less affluent or experience relative deprivation. The Office for National Statistics (ONS) [housing affordability ratio](#) shows St Albans to be a major outlier, and this has a direct bearing on the calculation of local housing need (LHN) under the Government's standard method (both the existing method, which dates from 2018, and the new method currently under consultation). This ratio applies median workplace-based earnings, and there are [alternative ratios](#) that are lower on account of applying residence-based earnings, but the fact remains.

2.3.8 The plan area is introduced across two maps below:

- Figure 2.2 – shows St Albans in the wider sub-regional context. St Albans is formally part of the South West Herts sub-region, but also relates closely to Luton (to the north, within Bedfordshire) and Hatfield to the east (within Welwyn Hatfield Borough, which is formally part of North, East and Central Herts).
- Figure 2.3 – is taken from the Green Belt Review (2023) and highlights the distinction between: A) towns (Hemel Hempstead, St Albans and Harpenden); B) other settlements inset from the Green Belt; and C) small settlements that are washed over by the Green Belt. It can also be seen that there is built form to the southeast of St Albans and to the west of London Colney that is washed over by the Green Belt. The possibility of inseting currently washed-over areas of built form is a consideration for local plans.

## 2.4 The plan period

2.4.1 The new Local Plan is likely to be adopted in 2025/26, and must “look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure...” As such, the plan period runs to 2041.

2.4.2 In turn, a key aim is to provide for development needs to 2041. However, there is some flexibility, with the NPPF requirement to identify “*specific, deliverable sites for years one to five...*” and “*specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15...*”

2.4.3 Additionally, there is a need to be mindful of NPPF paragraph 22, which states: “*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead...*”

**Figure 2.2:** The plan area in the sub-regional context

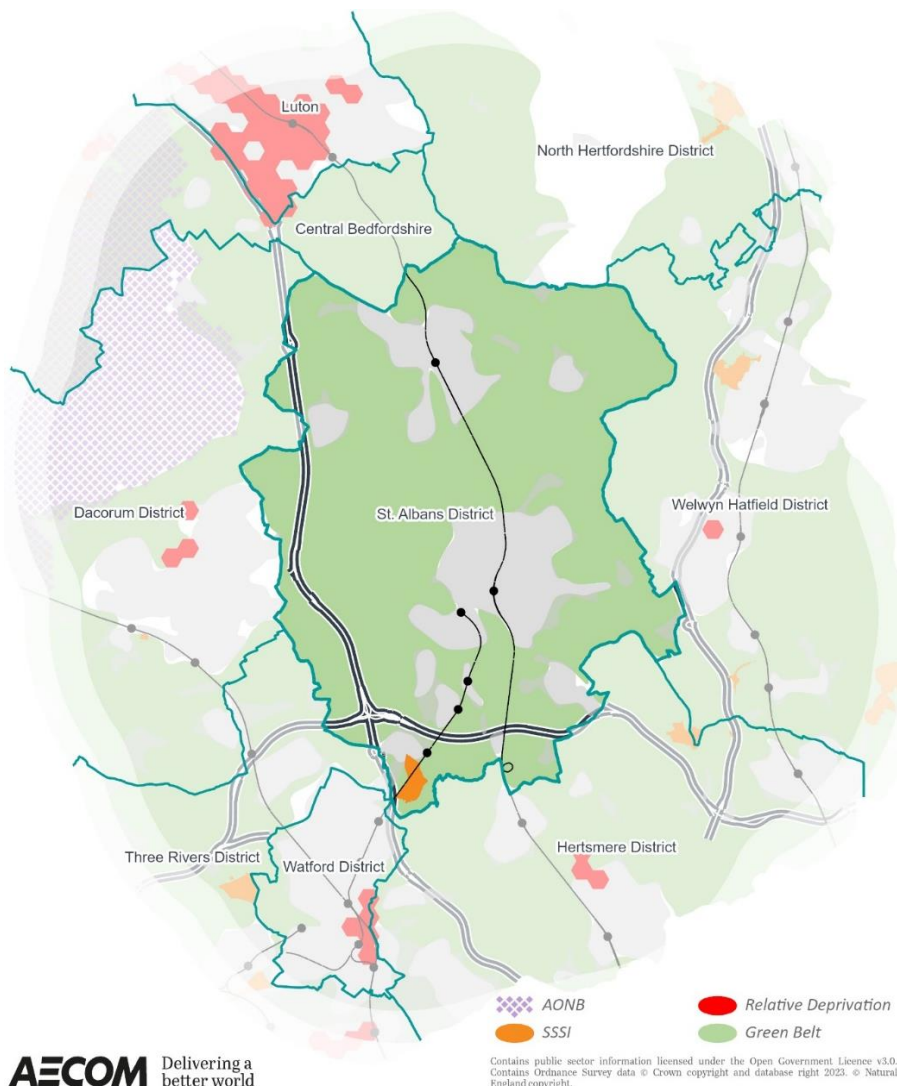
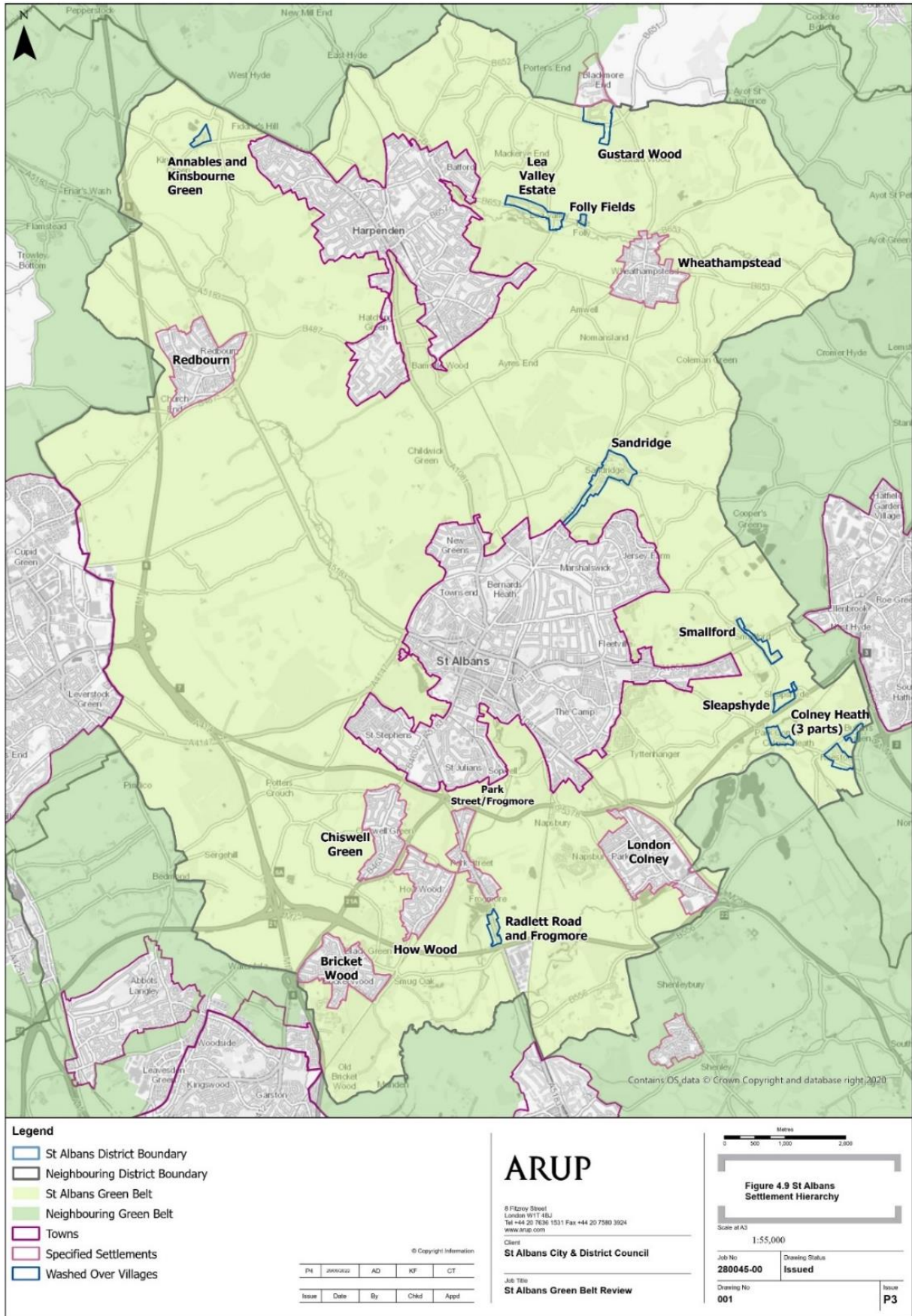




Figure 2.3: A map of the plan area (taken from the Green Belt Review, 2023)



## 2.5 Plan objectives

- 2.5.1 A number of key issues locally are introduced above, but there are wide ranging other key issues for the Local Plan. Many key issues for the Local Plan derive from the NPPF which, for example, requires that local plans provide “a framework for addressing housing needs and other economic, social and environmental priorities.” One arguably overriding key issue is climate change, with the Council having declared a Climate Emergency in 2019 and the urgency of the issue having crystallised since that time.
- 2.5.2 Understanding of local and larger-than-local key issues has been translated by the Council into a succinct set of objectives to guide preparation of the Local Plan – see Table 2.1.

**Table 2.1: The plan objectives**

Broad focus	Specific focus	Objective
Climate Change and Spatial Strategy (low carbon)	Climate change	Promote adaptation to and mitigation of the Climate Change Emergency; seek to achieve net zero by 2030, including through the Council doing everything reasonably within its power; promote the use of renewable resources, reduce greenhouse gas emissions, protect natural resources and reduce waste.
	Sustainable use of land / Green Belt	Prioritise the effective use of land by locating new development on previously developed land first, where appropriate; and protecting and enhancing the Green Belt.
Housing	Housing	Provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations.
Infrastructure	Community Infrastructure	Make sufficient provision for and access to community infrastructure in sustainable locations.
	Transport	Prioritise and enable the safe and attractive use of active and sustainable means of transport and reduce the need for people to travel.
	Utilities infrastructure	Ensure that essential utilities infrastructure, including broadband, is delivered to support our existing residents and services as well as growth.
Economy and Employment	Economy and employment	Encourage strong and resilient economic growth, employment and skills opportunities;
	Town and Village Centres and retail	including supporting growth in green and creative sectors; and supporting new ways of working across the District.
Natural and Historic Environment	Natural environment and biodiversity	Support the role that the town, village and neighbourhood centres play at the heart of local communities, sustainable lifestyles and the visitor economy, by taking a positive approach to their growth, management and adaptation.
	Heritage	Protect, maintain and enhance the natural environment, including biodiversity, the landscape, green infrastructure and our waterways.
Healthy Places and High Quality Design	High quality design	Conserve and enhance our rich and varied historic assets and their settings, celebrating their local distinctiveness and character.
	Public Health and Wellbeing	Achieve high quality, innovative, well designed and locally distinctive developments in existing and new places.

## 3 The SA scope

### 3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in **Appendix II**, as well as within a Scoping Report (2021), although that report is now somewhat out-of-date.
- 3.1.3 The aim is not to define the scope of the SA comprehensively, recognising that there is a need for flexibility to respond to the nature of the emerging plan and reasonable alternatives, and latest evidence.

### 3.2 Consultation on the scope

- 3.2.1 The Strategic Environmental Assessment (SEA) Regulations 2004 require that: “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies.” In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>3</sup> As such, these authorities were consulted on the SA scope in 2021, plus the Council took the additional step of also consulting more widely (simultaneously also seeking views on a new Local Development Scheme and a Call for Sites).
- 3.2.2 A total of 16 consultation responses were received; see: [www.stalbans.gov.uk/sustainability-appraisal](http://www.stalbans.gov.uk/sustainability-appraisal). Further information was presented in Appendix II of the ISA Report (2023). In summary:
- Statutory consultees and other organisations with a strategic remit – a detailed response was received from the Environment Agency, and a more generic response received from Historic England (including a focus on ‘generation of reasonable alternatives; see discussion in Part 1). Natural England did not submit a response. Herts and Middlesex Wildlife Trust submitted a brief response, whilst both Thames Water and National Highways responded to the consultation but did not comment on SA scoping.
  - Neighbouring authorities – did not respond, nor did the County Council.
  - Town and Parish Councils – a detailed response was received from Sandridge Parish Council, and less detailed responses were received from Harpenden Town Council and London Colney Parish Council.
  - Site promoters – a total of seven submitted a response. Several made comments on scoping the ‘housing’ related issues/objectives that should be a focus of the appraisal, e.g. seeking added consideration of housing affordability ratios, affordable housing need and rural housing need; and another focus was the scope of the SA in terms of community infrastructure issues/objectives. Three of the responses did not focus on the SA scope, but rather discussed expectations in respect of subsequent stages of the plan-making SA process, particularly consideration of reasonable alternatives (see Part 1).
- 3.2.3 This section of the ISA Report (2023) invited further comments on the SA scope, but none were received.

### 3.3 The SA framework

- 3.3.1 The scoping work presented within the Scoping Report (2021) led to a draft SA framework, comprising 16 objectives grouped under ten topic headings. In light of the consultation responses received in 2021, as well as discussions between AECOM and SADC officers (informed by latest evidence and understanding of the scope of the emerging plan), the decision was taken to make some modest adjustments, as reported in Appendix II of the ISA Report (2023). At the current time the SA framework is unchanged from that previously presented in 2023 – see Table 3.1.

<sup>3</sup> In-line with Article 6(3) of the SEA Directive, these bodies were selected because “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.”

**Figure 3.1: The SA framework**

Topic	Objective(s)
Accessibility	<ul style="list-style-type: none"> <li>Support access to community infrastructure – both strategic (e.g. secondary schools) and local (e.g. primary schools) – for all sections of society, including mindful of 15 minute city / 20 minute neighbourhood principles.</li> </ul>
Air and wider env quality	<ul style="list-style-type: none"> <li>Achieve good air quality across the District and more widely, including with a particular focus on improving air quality in current known hotspots, notably air quality management areas.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>Protect, maintain and enhance biodiversity in the District and more widely, supporting effective implementation of the biodiversity net gain regime and taking a landscape scale perspective (mindful of the forthcoming Local Nature Recovery Strategy).</li> </ul>
Climate change adaptation	<ul style="list-style-type: none"> <li>Reduce the risk of flooding accounting for climate change scenarios and with a focus on risk affecting both new and existing communities.</li> <li>Ensure climate change adaptation / resilience more widely, recognising that this is a cross-cutting topic, e.g. with links to biodiversity, communities / health and the water environment.</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>Ensure all steps are taken in support of climate change mitigation, with a focus on per capita emissions, but also mindful of District-wide total emissions and associated targets.</li> <li>Reduce greenhouse gas emissions (with a particular focus on per capita) from both the built environment (a focus here) and transport (also a separate focus of discussion below).</li> </ul>
Communities and health	<ul style="list-style-type: none"> <li>Support active and healthy communities, including via access to open spaces, high quality green and blue infrastructure, active travel infrastructure and sports and recreation facilities.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Achieve a strong and resilient economy across the District (and more widely), including by providing for employment land needs and supporting St Albans city centre and other centres with a strategic response to national trends.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>Preserve and enhance heritage assets and their settings and consider the historic environment more widely, including links to landscape, character and sense of place.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Provide a wide range of good quality housing (in terms of type, tenure and location) which meets headline housing need as far as possible and accounts for the specific needs of all sections of society.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Maintain and enhance the quality of the countryside and landscape, particularly those that are known to be highly valued, e.g. those that are highly visible, accessible or contribute strongly to wider character and sense of place.</li> </ul>
Soils and other resources	<ul style="list-style-type: none"> <li>Prioritise locating new development on previously developed land first.</li> <li>Minimise development on best and most versatile agricultural land and minimise the degradation/loss of soils, particularly soils known to be of higher quality.</li> <li>Promote efficient use of natural resources, account for the Hertfordshire Minerals and Waste Plan and protect material assets and geodiversity.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Encourage the use of active and other ‘sustainable’ means of transport and reduce the need for people to travel.</li> </ul>
Water	<ul style="list-style-type: none"> <li>Conserve and enhance water quality and flow and reduce the risk of water pollution, including by taking careful account of any capacity issues at wastewater treatment works.</li> </ul>

## **Part 1: What has plan-making / SA involved up to this stage?**

# 4 Introduction to Part 1

## Overview

- 4.1.1 Work on the current draft Local Plan began in **2020**, when a previous version of the St Albans Local Plan was [withdrawn](#). A range of work has been undertaken to date, including through a consultation in **2023**.
- 4.1.2 However, the focus here, within Part 1, is not to relay the entire backstory of the plan-making / SA process, nor to provide a comprehensive ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Section 5**
  - present an appraisal of the reasonable alternatives - see **Section 6**
  - explain the Council’s reasons for selecting the preferred option - see **Section 7**
- 4.1.3 Presenting this information is in accordance with the requirement for the SA Report to present an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives dealt with*”.

## Reasonable alternatives in relation to what?

- 4.1.4 The legal requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan” (see Section 2). Following discussion of plan objectives with SADC officers, it was determined appropriate to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF paragraph 69), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly a key, even overriding, objective of the Local Plan.<sup>4</sup>
- 4.1.5 Also, note that spatial strategy alternatives can be described as “**growth scenarios**” as a shorthand, and can also helpfully be described in summary as comprising alternative key diagrams.
- 4.1.6 This approach was taken in the ISA Report (2023) and was generally well received. It is also noted that the Hertfordshire Growth and Infrastructure Unit advocates a focus on growth scenarios, with 77 references within the document that sets out protocol for local plan [engagement](#).

### What about site options?

- 4.1.7 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the St Albans Local Plan. Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.

### Is the focus on housing sites?

- 4.1.8 Establishing a supply of land to meet housing needs (alongside infrastructure delivery, place-making etc) is typically a matter of overriding importance for local plans, and the St Albans Local Plan is no exception. However, local plans are also tasked with meeting wider development needs, including in respect of employment land and specialist accommodation. The process set out in Section 5 is somewhat *housing-led*, but other needs are discussed as appropriate, including within the concluding section (Section 5.5).

### What about other aspects of the plan?

- 4.1.9 As well as establishing a spatial strategy, allocating sites etc, the Local Plan must also establish policy on thematic district-wide issues, as well as site-specific policies. Broadly speaking, these can be described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified.<sup>4</sup> This was also the case in 2023, at which time comments on DM RAs were sought through the consultation, but no comments were received.

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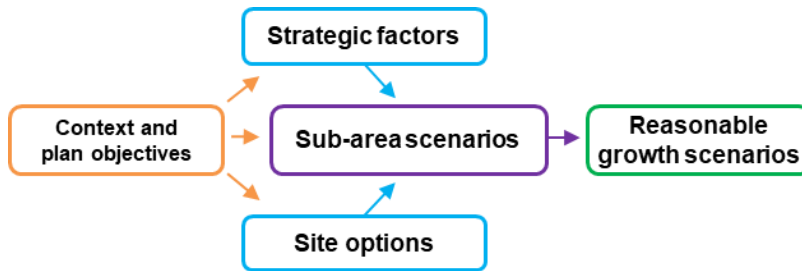
<sup>4</sup> Another consideration is a need to define ‘do something’ alternatives that are meaningfully different, in that they will vary in terms of ‘significant effects’, where significance is defined in the context of the plan. ‘Do nothing’ is not a reasonable alternative to ‘do something’ (because ‘do nothing’ is the baseline, and particularly where the very objective is to do something), and the Government’s PPG is clear that SA “*should only focus on what is needed to assess the likely significant effects of the plan*”.

# 5 Defining growth scenarios

## 5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: Defining reasonable growth scenarios



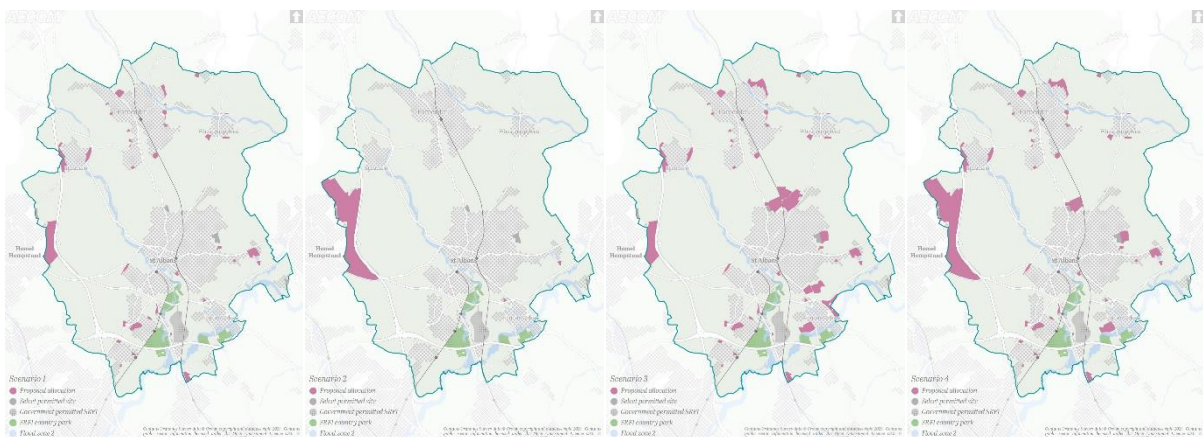
5.1.2 This process is described across the following sub-sections:

- **Section 5.2** – explores **strategic factors** with a bearing on growth scenarios.
- **Section 5.3** – considers individual **site options**, as the ‘building blocks’ of growth scenarios.
- **Section 5.4** – draws upon the preceding two sections to consider options/scenarios for **sub-areas**.
- **Section 5.5** – combines sub-area scenarios to form **reasonable growth scenarios**.

5.1.3 With regards to the **context**, the first point to make is that key context is provided by work completed in 2023 to define, appraise and consult upon a set of four reasonable growth scenarios. In some respects, the work reported below is an update to that presented in Section 5 of the Interim SA Report. However, the aim is to present analysis that is up-to-date, and ultimately to arrive at up-to-date growth scenarios.

5.1.4 A second point to make here, regarding context to the process of defining reasonable growth scenarios set out below, is that clearly there are **numerous workstreams** underway outside of the SA process, that must feed-in as appropriate and as far as practically possible. This includes non-SA workstreams examining the merits of individual site options, as discussed in Section 5.3.

Figure 5.2: Work to explore growth scenarios in 2023 is a key input to the process



### A note on limitations

5.1.5 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an **“outline of the reasons for selecting alternatives...”** [emphasis added].

## 5.2 Strategic factors

### Introduction

5.2.1 The aim of this section of the report is to explore strategic factors (issues and options) with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes are needed (regardless of capacity to provide them)?
- Broad spatial strategy – broadly where is more/less suited to growth, and what typologies are supported?

### Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the District, before exploring *high level* arguments for the Local Plan providing for a quantum of growth either above or below LHN.

**N.B.** it is important to emphasise that this section does not aim to conclude on the question of how many homes should be provided for across the reasonable growth scenarios. Rather, the aim is to present an initial high level discussion, to essentially frame subsequent discussion of broad strategy options, site options and sub area scenarios. It is only *then* that a conclusion can be drawn (see Section 5.5).

### Background

5.2.3 A central tenet of local plan-making is the need to **A**) objectively establish housing needs ('policy-off'); and then **B**) develop a policy response to those needs. The Planning Practice Guidance (PPG) explains: *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure..."*

5.2.4 With regards to (A), the NPPF (paragraph 61) states that **LHN** should be established via an assessment "conducted using the **standard method**" unless there are "exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach..."

5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver this housing requirement (over time, i.e. year-on-year, which will invariably necessitate putting in place a 'buffer' to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

### St Albans' Local Housing Need (LHN)

5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (see the Planning Practice Guidance, PPG). This fourth step, known as the 'cities and urban centres uplift', does not have a bearing on the calculation of St Albans' LHN.

5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections.

5.2.8 Updates to the PPG in late 2020 then confirmed this approach; however, there is still a need to be mindful of more recent data, which is a matter explored through a Local Housing Needs Assessment (LHNA, 2024). The LHNA finds that actual household growth has been lower than projected by the 2014-based projections, which gives rise to the possibility of arguing 'exceptional circumstances' to depart from the standard method-derived calculation of housing need. However, the LHNA concludes:

"When affordable housing provision is overlaid... it is clear that there is a very substantial need for affordable housing... [and] there would be clear adverse consequences on affordable delivery from reducing overall housing need below the standard method levels... We do not therefore find that the evidence points towards... deviation from the standard method as a means of assessing housing need."

5.2.9 In conclusion, LHN is understood from the Government's standard method, and this currently stands at **885 dwellings per annum** (dpa). This amounts to 14,603 homes in total over the 16.5 year plan period, which runs from midway through the 2024/25 monitoring year to the end of the 2040/41 monitoring year.



### Is it reasonable to explore setting the housing requirement at a figure below LHN?

- 5.2.10 Paragraph 11 of the NPPF states: "... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." [emphasis added]
- 5.2.11 St Albans District is heavily constrained by NPPF "policies... that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development..." In particular, the District falls within the London Metropolitan Green Belt.
- 5.2.12 The Green Belt constraint was a key factor – alongside wider strategic, sub-area and site-specific factors – that led to a decision in 2023 to define, appraise and consult upon growth scenarios that would involve setting the housing requirement significantly below LHN (and so generate unmet need). Subsequently, there has been much discussion nationally regarding whether it is "mandatory" for local plans to provide for LHN in full, and about whether local authorities are "required" or "expected" to review and/or release Green Belt as part of local plan-making, with a view to providing for housing needs (in full or otherwise).<sup>5</sup>
- 5.2.13 Ultimately, the current situation in terms of national policy context is considered to be broadly unchanged from that in 2023. With regards to deciding the housing requirement, new wording in the NPPF (2023) sets out that LHN is an "advisory starting point", but it is difficult to suggest that this does more than simply clarify the pre-existing position. With regards to Green Belt, it is simply the case that there is, and always has been, a 'high bar' to evidencing and ultimately justifying Green Belt release, such that decision-making must be informed by technical work, systematic consideration of options/alternatives and consultation.
- 5.2.14 On the basis of the points discussed above, there is a clear *high level* argument for exploring growth scenarios that would involve setting the housing requirement at a figure below LHN and, in turn, generating unmet housing needs that must then be met by one or more neighbouring or nearby local authorities.
- 5.2.15 However, on the other hand, there is a strong argument for ruling out "very low growth". This reflects:
- The extent of housing need(s) locally, including in respect of affordable housing (discussed below).
  - Understanding that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, for example in terms of supporting communities, health and wellbeing, strategic infrastructure delivery and the local economy.
  - The fact that St Albans sits within a constrained sub-region where unmet housing need is already an issue, with the reality being that there is little or no confidence regarding where, when or even if any unmet housing need generated by the St Albans Local Plan would be provided for. Neighbouring local authorities have objected to past versions of the St Albans Local Plan (pre-2023; i.e. versions that failed and were not progressed) due to concerns around generation of unmet housing need. Furthermore, the situation in respect of unmet need within the sub-region has worsened since 2023, as discussed below.
  - The two lower growth scenarios from 2023 (Scenarios 1 and 2; see above) were arguably shown to perform poorly overall through the appraisal (see the summary appraisal [here](#)). The appraisal did not seek to reach overall conclusions, but it is clearly the case that the lower growth scenarios were shown to have a range of drawbacks relative to the preferred scenario that formed the basis for the Draft Local Plan (Scenario 3). That said, this reflected specific assumptions regarding precisely *how* lower growth would be delivered (Scenario 1 assumed no HGC; Scenario 2 assumed no Green Belt release bar HGC).
  - There was little if any support for either of the two lower growth scenarios through the consultation. Indeed, none of the stakeholder organisations that responded to the consultation referenced work to explore (i.e. define, appraise and consult upon) reasonable alternative growth scenarios.
  - The Government's direction of travel, including as reflected in the Draft NPPF (2024), as discussed.

<sup>5</sup> A letter from the Secretary of State, Michael Gove MP to all local authorities in England dated 5<sup>th</sup> December 2022 explained: "*Green Belt: further clarifying our approach to date in the National Planning Policy Framework and the Localism Act, we will be clear that local planning authorities are not expected to review the Green Belt to deliver housing....*" This intent was then reflected in new wording within the Green Belt section of the draft NPPF (Dec 2022): "*LPAs are not required to review and alter green belt boundaries if this is the only way of meeting their assessed local housing need in full.*" However, this new wording was then not taken forward within the final NPPF (Dec 2023; see the Government's explanation [here](#)).

### Is it reasonable to explore setting the housing requirement at a figure above LHN?

5.2.16 There are three high level reasons for considering the possibility of a housing requirement above LHN.

#### *Local housing need*

5.2.17 The standard method-derived LHN figure introduced above is 'capped', meaning that the effect of step two of the method ("an adjustment to take account of affordability") is capped. The uncapped figure is significantly higher (319 dpa), and the PPG states: "*Where [standard method LHN] is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered.*"

5.2.18 Furthermore, numerous consultation responses received from the development industry in 2023 suggest 'exceptional circumstances' to warrant using a method other than the standard method in order to arrive at LHN. These arguments are not supported by the LHNA (2024), but some of the specific points made do serve as a reason for remaining open to the possibility of setting the housing requirement 'above LHN'.

5.2.19 Finally, and to reiterate, the current draft standard method, which generates a much higher LHN, is noted. However, the plan is being prepared under transitional arrangements, such that LHN is taken as 885 dpa.

#### *Affordable housing need*

5.2.20 The Local Housing Needs Assessment (2024) identifies a need for 802 affordable homes per annum (including 449 pa rented), which is a very high number relative to LHN, and noting that the PPG states: "*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*" Furthermore, the recent rate of affordable housing delivery, as a percentage of market homes, as understood from the past five [Authority Monitoring Reports](#) (AMRs), is 19.4% (breaking down as 23% social rent; 57% affordable rent; 21% affordable ownership).

5.2.21 However, the question of 'uplifting' to reflect affordable housing needs is very complex, as discussed within the LHNA (2024), and as succinctly explained recently by the [West Berks](#) Local Plan Inspector: "*... policy SP19 is expected to deliver a total of 2,190 affordable homes on market-led schemes... There would be a nominal deficit of around 3,420 against the identified need for... affordable homes although **the link between affordable and overall need is complex** as many of those identified as being in need of an affordable home are already in housing.*" Another consideration is the risk of 'uplifting' the housing requirement to account for affordable housing need only to then find that the market fails to deliver the homes leading to a risk of failing the HDT, with resulting punitive measures, i.e. the 'presumption'.

5.2.22 Finally, one very recent local plan of note is that for [Chelmsford District](#) (May 2024). Here the proposed housing requirement is 5% above standard method LHN to reflect "the needs of specific groups".

#### *Wider arguments*

5.2.23 The NPPF (para 67) explains: "*The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.*"

5.2.24 With regards to 'unmet' housing need from neighbouring areas the simple fact that is that unmet need is a significant issue – see Box 5.1.<sup>6</sup> With regards to "economic development or infrastructure investment", it is noted that further guidance is also presented within the [PPG](#) (although it conflates housing need and the housing requirement) and, in this light, these are not considered to be significant considerations for the purposes of the current discussion (although there are economic opportunities). The LHNA (2024) states: "*Expected job creation locally and infrastructure investment have also been considered; however the evidence does not suggest that housing need is higher than the standard method figures.*"

#### *Conclusion*

5.2.25 In light of the above, there is a high level case for exploring growth scenarios involving setting the housing requirement above LHN, particularly given latest understanding of unmet housing need within the sub-region. A high level case was similarly acknowledged in 2023, but then higher growth scenarios were ultimately judged to be unreasonable in light of wider factors (Section 5.5 of the ISA Report). At the current time there is an opportunity to revisit wider factors (see below) and, in turn, the conclusion (Section 5.5).

<sup>6</sup> Providing for unmet need is also discussed elsewhere within the NPPF, including at para 11 (which also states that LHN should be applied as "minimum" figure as part of work leading to a housing requirement), and at para 35 (the 'tests of soundness').

**Box 5.1: Discussion of unmet housing need**

The SW Herts Joint Strategic Plan (JSP) will likely prove well-placed to deal with unmet housing need. However, that does not mean that the St Albans Local Plan can be prepared blind to known or potential unmet housing need from elsewhere, particularly that arising from adjacent or otherwise well-linked neighbouring authorities.

This is for two reasons. Firstly, there is a risk of the SW Herts JSP facing unforeseen issues, given that the JSP is being prepared voluntarily (and noting recent examples of JSPs elsewhere failing). Secondly, addressing unmet housing need as close to source as possible, and in a timely fashion, is a key issue for any local plan.

Unmet need risk typically emanates outwards from London, and the current situation for the St Albans Local Plan is no exception. However, in the case of St Albans District, there is also a need to consider risk of unmet need emanating from the west (Dacorum Borough) and from the east (Welwyn Hatfield Borough).

With regards to neighbouring authorities to the north, there is potential for unmet need, but there is little reason to suggest that St Albans District would be well-placed to assist in meeting this, noting that: Luton shares a housing market area with Central Bedfordshire; and Stevenage falls within the NEC Herts sub-region.

Having made these initial points, unmet need risk from three directions is discussed below.

**Risk of unmet need from the south**

Beginning with **Three Rivers District**, in 2023 the Council published a consultation document proposing that central to the Local Plan should be a strategy described as “Low Housing Growth and Green Belt Restraint”. The consultation document identifies supply totalling ~4,850 homes, which is ~6,600 homes short of LHN (which is understood from the standard method). However, it could transpire that there is a need to set the housing requirement below 4,850, such that there is a supply buffer, hence unmet need could easily be **~7,000 homes**.

Moving west to **Watford Borough**, the adopted Local Plan (2022) sets the housing requirement at LHN. As such, the conclusion is **no risk of unmet need**. However, there is a need to note the recent Authority Monitoring Report (November 2023), which [suggests](#) that delivering the housing requirement is proving to be challenging. It is also noted that only 12% of homes delivered were ‘affordable’ in the most recent monitoring year.

The final authority in this sector is then **Hertsmere Borough**, where a Draft Local Plan was published in April 2024 identifying ~9,400 homes supply, which is ~2,200 homes short of LHN (standard method). However, it could transpire that there is a need to set the housing requirement significantly below 9,400, with a view to a healthy supply buffer, particularly noting that the supply involves a heavy reliance on brownfield sites (~25% of the identified supply). Also, the strategy includes a new settlement (Bowmans Cross), which would deliver late in the plan period and be associated with delivery risk. As such, unmet need could easily be **~3,000 homes**.

Finally, there is a need to note the risk of unmet need from **London boroughs**. The Barnet, Enfield and Harrow Local Plans are all progressing well and, in each instance, the proposal is to provide for the London Plan ‘target’ in full (over the course of the entire plan period). However, in each instance there is a recognition that local housing need is arguably much higher; specifically, see [para 4.44](#) of the Barnet Local Plan, the Harrow Local Housing Need Assessment ([2024](#)) and the Draft Enfield Local Plan at [para 2.29](#), which states: “... by the end of the plan period, there will... be an estimated shortfall of approximately 38,000 homes in the Borough when compared against the locally assessed [standard method] housing need.”

Furthermore, there is a need to recognise that London is arguably a single housing market area, and that unmet need is a major issue for London as a whole. Across London the simple fact is that the London Plan was adopted in the knowledge that it generates significant unmet need, and the situation may well have worsened since the time of its adoption. However, a new London Plan is now on the horizon, which may be able to remedy the situation and/or will serve as a forum for engaging with local authorities surrounding London on unmet need.

**Dacorum Borough**

A consultation document was published in October 2023 identify a supply of ~14,350 homes, in the context of a LHN (standard method) amounting to ~16,300 homes. The consultation document does not discuss the question of a supply buffer but were this to be ~5% then the housing requirement by be set at ~13,500, leading to an unmet need figure in the region of **2,800 homes**. However, it is noted that the [SA Report](#) does give close consideration to a series of higher growth scenarios, such that there is scope for this unmet need figure to decrease. A key constraint locally is SANG capacity, but it is understood that new options are being explored.

**Welwyn Hatfield Borough**

The recently adopted Local Plan includes a [supply](#) of 13,400 homes, which is below LHN (not calculated using the standard method, which generates a significantly higher figure), plus the plan runs only to 2036. Hence there is **significant unmet need**. However, the intention is for this to be addressed through an early plan review.

### Conclusion on housing quanta options (high level)

- 5.2.26 In light of the discussion above, there are strategic arguments for setting the housing requirement at a figure both above and below LHN. This leads to an **inherent challenge**, in respect of preparing the St Albans Local Plan, in the absence of a higher-level plan to distribute growth across the sub-region.
- 5.2.27 In turn, there is an argument for awaiting the outcomes of the South West Herts Joint Strategic Plan. However, this is not a realistic option. There is a critical need for an up-to-date local plan in order to avoid the risk of Government intervention and to avoid a continued risk of ‘planning by appeal’.
- 5.2.28 One conclusion that might be drawn is that arguments in both directions ultimately cancel each other out and lead to a strategic argument for setting the housing requirement at **precisely LHN**, and this was the approach taken by the Draft Local Plan published for consultation in 2023.
- 5.2.29 Looking at the picture nationally, by far the most common approach taken through local plans is to set the housing requirement at precisely LHN (or, in London, the target figure set by the London Plan). However, amongst the London metropolitan Green Belt authorities it is not uncommon to argue for lower growth.
- 5.2.30 In this light, it is prudent to remain open to **lower growth** scenarios involving a housing requirement set below LHN (and, in turn, the generation of unmet need), in that failing to do so could lead to challenge. However, work to explore lower growth scenarios must be undertaken in the knowledge that the lower growth scenarios appraised and published for consultation in 2023 generated limited direct comment.
- 5.2.31 With regards to **higher growth**, the conclusion here is that whilst such scenarios were ultimately ruled out as unreasonable in 2023, there is now increased strategic argument, particularly given unmet need, but also noting the Government’s direction of travel at the time of writing (August 2024).
- 5.2.32 It is also prudent to remain open to higher growth scenarios in light of the volume of calls for this from the development industry. However, on the other hand, there were no clear calls for higher growth from organisations with a wider strategic interest. For example, the response received from Three Rivers District does not call for higher growth in order to provide for unmet housing need from Three Rivers; indeed, the response requests: “... *further detailed evidence setting out if alternative options are available. Options should include a reduction in Green Belt sites to balance growth and quality of life.*”
- 5.2.33 The matter of precise quanta figures to reflect across the reasonable alternative growth scenarios is returned to within **Section 5.5**, subsequent to consideration of broad spatial strategy issues/options (the remainder of Section 5.2), site options (Section 5.3) and sub-area scenarios (Section 5.4).
- 5.2.34 There are two final points to note:
- **Appendix III** presents a high level appraisal of four alternative growth quanta figures, essentially looking to supplement the discussion within this section. The appraisal is *inherently limited*, because it is undertaken with no assumptions regarding spatial strategy, let alone specific supply components.
 

This is a point we would wish to emphasise, in light of comments received from the Home Builders Federation (HBF) in respect of the equivalent work presented in Appendix III of the ISA Report (2023). The HBF suggest that the automatic response to the limitation is to undertake work to assign spatial assumptions to each of the quanta figures appraised (in particular, the HBF have an interest in the highest figure appraised, which is a housing requirement set at ~1,200 dpa). However, that is not the case, recalling that high level work reported here, within Section 5.2, is a means to an end (Section 5.5).
  - Aside from LHN, work has also been undertaken to establish **wider development needs**. In particular, attention focuses on employment land needs and the accommodation needs of Gypsies and Travellers. Matters are discussed further below, including within Sections 6.7 and 6.8, but in summary these are both very significant considerations for the Local Plan.
    - With regards to employment land need, there is a readily apparent approach to providing for both locally arising need and an element of unmet need arising from elsewhere, namely a strategic expansion of the Maylands Estate; however, this is a matter for ongoing consideration (see below).
    - With regards providing for Gypsy and Traveller accommodation needs, it is unquestionably the case that identifying supply options to provide for the identified need in full is a significant challenge. A key opportunity is to deliver new pitches across one or more sites within Hemel Garden Communities, but taking forward this option is, of course, a matter for ongoing consideration (see below).

## Broad spatial strategy

### Introduction

5.2.35 This is the second of two sections examining 'strategic factors' of relevance to the task of defining reasonable growth scenarios. The aim is to explore broad spatial strategy issues / options as well as the question of broad growth typologies that are supported, e.g. strategic versus non-strategic.

### A note on approach

5.2.36 A lengthy discussion was presented within the equivalent section of the ISA Report (2023). For example, there was a review of the South West Herts JSP also Local Plan Advisory Group (LPAG) meetings. Furthermore, the growth scenarios that were then arrived at in Section 5.5 of the ISA Report, and then appraised in Section 6, also varied very significantly in terms of broad spatial strategy (see Figure 5.2).

5.2.37 However, it was then subsequently the case that the question of broad spatial strategy generated limited interest through the consultation. The County Council made relevant comments, but other organisations with a district-wide interest made very few comments on spatial strategy. Numerous organisations with a settlement specific interest (primarily Parish Councils) or a site-specific interest (i.e. site promoters and objectors) made some comments of relevance, but these can be picked up in Section 5.4, below.

5.2.38 As such, set out below is a slimmed-down discussion relative to that within the ISA Report (2023), also recognising potential to explore broad strategy in other sections below, including the appraisal sections.

5.2.39 In particular, it is appropriate to use this section as an opportunity to present the preferred broad spatial strategy as understood from Section 1 of the Draft Local Plan (2023). It overall drew limited criticism and, in turn, must be taken forward, recalling the context of needing to adopt a plan posthaste.

5.2.40 The thematic headings below reflect the discussion in Section 1 of the Local Plan.

### Brownfield first

5.2.41 There is a clear need to maximise supply from brownfield (or previously developed land, PDL). However, there is also a need to ensure that sites are developable (NPPF paragraph 69), in that there is reasonable confidence that they will come forward in the plan period, accounting for complex challenges such as multiple land-ownership and existing uses. This is key context to work undertaken to identify sites beyond those actively being promoted. Another consideration is that some brownfield sites outside of urban areas are associated with suitability challenges, e.g. in terms of the ability to walk or cycle to key destinations.

### Settlement hierarchy

5.2.42 There is limited call for distributing growth in a way that departs significantly from the settlement hierarchy, recognising: A) the importance of focusing growth at higher order settlements where there is good 'accessibility'; and B) the value of directing proportionate growth to lower tier settlements (villages).

5.2.43 From the key diagram presented within the Draft Local Plan (2023) it can be seen that 11 out of the 12 strategic allocations were directed to top tier settlements; namely Hemel Hempstead and St Albans (tier 1), Harpenden (tier 2), and London Colney (tier 3). The one exception was a strategic allocation at Redbourn (a tier 4 settlement, along with Wheathampstead), influenced by the Green Belt Review (2023).

5.2.44 With regards to non-strategic sites, site selection was driven to a large extent by the Green Belt Review (2023), but the distribution of sites nevertheless aligned quite strongly with the settlement hierarchy.

5.2.45 Table 5.2 of the ISA Report (2023) showed the preferred distribution of growth between settlements (i.e. the preferred 'growth scenario') accounting for all sites, i.e. both strategic and non-strategic. It showed good alignment with the settlement hierarchy, albeit not perfect alignment, as other factors also fed in.

5.2.46 Aside from Redbourn notably being directed higher growth than London Colney, the other point to note was marginally high growth at the linked villages in the southwest of St Albans, namely Chiswell Green, How Wood and Park Street / Frogmore and, in this respect, the recent appeal decisions are of note.

5.2.47 Table 5.2 of the ISA Report (2023) also showed three non-preferred growth scenarios, including one (Scenario 2) involving a major departure from the settlement hierarchy. However, Scenario 2 was appraised as having clear drawbacks, to the extent that any such scenario is now arguably unreasonable.

5.2.48 Finally, with regards to the question of a **new settlement**, this is a key consideration for many local plans, including with a view to ‘taking pressure off’ existing settlements; however, there are no reasonable options in St Albans. Several options were discussed in Sections 5.3 and 5.4 of the ISA Report (2023) and are covered-off again in Section 5.4 below, but it is ultimately the case that views on ‘unreasonableness’ have firmed-up since 2023, including given the strategic context discussed above.

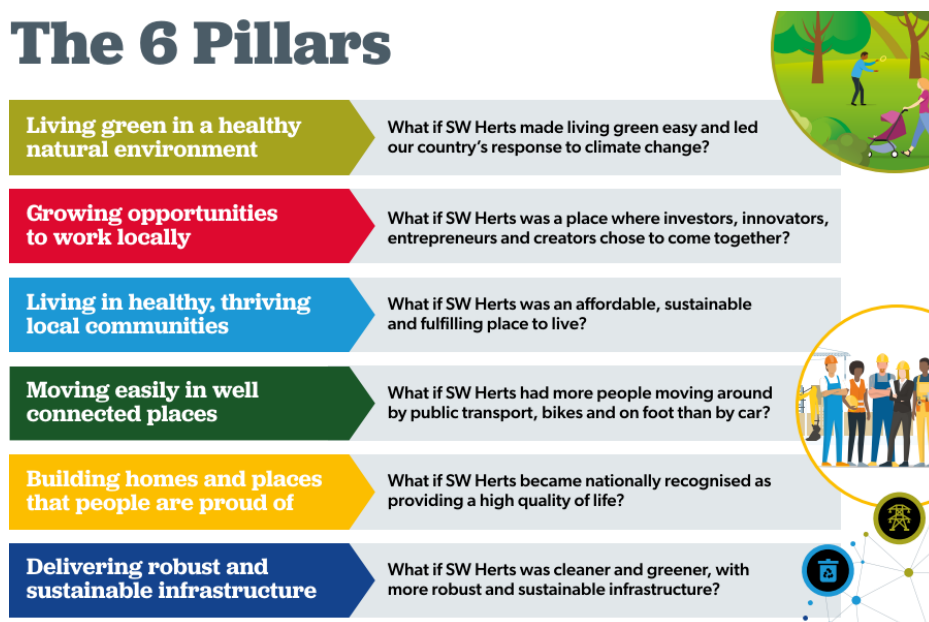
### SW Herts Joint Spatial Plan (JSP)

5.2.49 At the ISA Report stage there was a focus on introducing work to define spatial and thematic priorities through the JSP. However, through the consultation there was very little received in the way of substantive comments on this. The most notable comment was received from the Local Enterprise Partnership (LEP):

“We are very pleased to note that SADC is working closely with neighbouring authorities under the auspices of the [JSP] since the council has much to gain by delivering change and growth that complements rather than conflicts with adjoining areas... especially the case with Dacorum... [HGC].”

5.2.50 At the current time, the key point to note is recent adoption of a [vision](#) for SW Herts – see summary below. This is important context, but it is difficult to pick-out particular aspects of the vision that are a significant driver of broad spatial strategy, e.g. noting that the vision does not reference either St Albans or HGC.

**Figure 5.3:** Summary of the SW Herts JSP vision



### Hemel Garden Communities

5.2.51 At the ISA Report stage there was a focus on introducing HGC and explaining the backstory (going back to a previous version of the St Albans Local Plan that was submitted in 2018, before then being withdrawn).

5.2.52 Across Section 5 of the ISA Report there was detailed consideration of the ‘reasonableness’ of scenarios omitting HGC, before a decision was reached that it was reasonable to explore omitting HGC (see Figure 5.2).<sup>7</sup> However, this decision was marginal, and the two scenarios without HGC were shown to have significant drawbacks through the appraisal, such that any such scenario is now arguably unreasonable.

5.2.53 It is also the case that there were limited concerns raised regarding HGC through the consultation, and a considerable degree of support. Notable concerns were raised by CPRE and affected Parish Councils, and these concerns must be a focus of ongoing consideration, but other strategic stakeholder organisations stated support or did not raise significant concerns. The County Council notably stated:

- “A key objective of the programme is maximising opportunities presented by new, strategic development around Hemel Hempstead to secure a transformation of the town... [HGC] will require a holistic approach to the infrastructure planning... across Hemel Hempstead as a whole... The identified infrastructure strategy should be tested through [both the St Albans and Dacorum Local Plans].”

<sup>7</sup> All scenarios did, however, assume development on land ‘recommended’ by the Green Belt Review, adjacent to M11 J8.

- “It is encouraging to see that the local plan’s spatial vision is looking to stimulate sustainable economic growth; for example, through the development of green technology, with a particular focus on local supply chains and the circular economy (Hemel Garden Communities Vision and…)”
  - “The county council welcomes the inclusion of the HERT within [Policy TRA2]. More text may need to be considered/added regarding the HERT and how the local plan can support and establish a strong context for the HERT to come forward in future years and within the lifespan of the local plan.”
- 5.2.54 The consultation response received from Dacorum Borough is also clearly of note. It is generally very supportive of the approach taken to planning for HGC through the Draft Local Plan but seeks to emphasise the importance of a holistic focus on delivering outcomes for Hemel Hempstead as a whole, referencing the need to avoid issues faced as part of attempts to deliver cross border strategic growth north of Harlow.
- 5.2.55 Overall, support for HGC has crystallised in the Draft Plan stage (2023), and the reality is that the St Albans Local Plan would have to ‘go back to the drawing board’ without it, which would lead to major issues, as discussed. Also, it is clearly the case that St Albans support for HGC is crucially important for the timely progress of the Dacorum Local Plan (a district where there are also concerns around planning by appeal).
- 5.2.56 Matters are discussed further within Section 5.4, before a final conclusion is reached on how to treat HGC across the current reasonable growth scenarios.

### Infrastructure

- 5.2.57 Looking beyond HGC, the decision to support eight other strategic sites at the Draft Local Plan stage was strongly influenced by a desire to secure new / upgraded infrastructure alongside new homes, including new schools and cycling infrastructure in line with the [LCWIP](#). This approach was taken in light of the work of the Herts CC Growth and Infrastructure Unit, including around ensuring ‘good growth’ (a detailed review was presented in the ISA Report, 2023).
- 5.2.58 Moving forward, there remains a clear need to align growth with strategic infrastructure objectives, particularly community, transport, and green/blue infrastructure, but also mindful of wider infrastructure including wastewater-related and the electricity grid. As well as supporting strategic sites, there is a case for avoiding major changes to a strategy that has generated few concerns with key stakeholders.
- 5.2.59 Overall, there were few infrastructure concerns raised through the Draft Plan consultation with a bearing on broad spatial strategy. The County Council made detailed comments, most notably in respect of education, but the effect is not to call into question the strategy, nor to suggest any new strategic growth location to deliver new capacity.

Hertfordshire County Council  
Growth & Infrastructure Unit  
Local & Joint Strategic Plans  
Engagement Document



Version 4, May 2024



### The climate emergency

- 5.2.60 Addressing the climate emergency – and particularly decarbonisation in line with the District’s 2030 net zero target – is described within the Local Plan as centrally important to spatial strategy. Indeed, an objective of the Local Plan (see Table 2.1, above) is “Climate Change and Spatial Strategy (low carbon)”.
- 5.2.61 A priority is undoubtedly distributing growth – both within St Albans and the sub-region – in order to minimise emissions from **transport**, including by directing growth in line with:
- The settlement hierarchy and to accessible / well-connected locations parts of settlements. The County Council made numerous comments about growth aligning with settlement-scale transport strategy.
  - ‘Sustainable’ transport infrastructure objectives. On this, it is noted that no bus companies replied to the Draft Local Plan consultation, and that the County Council response says little on bus strategy.
  - Opportunities to deliver well masterplanned / designed and potentially mixed use developments, which serves as a further reason to support strategic growth locations (including, but limited to, HGC).
  - The findings of traffic modelling, including as congested roads are a barrier to cycling and bus travel. Modelling was not completed ahead of the Draft Plan consultation but has now been completed (it is a major undertaking). One factor is accounting for sites unexpectedly gaining permission at appeal.

5.2.62 With regards to per capita emissions from the **built environment**, there is a clear need to require net zero development and, in this regard, the following clear commitment within the SW Herts Vision (December 2030) is of note: *“Ensure all new development is net zero carbon and striving to be carbon negative.”*

5.2.63 However, the implications for broad spatial strategy are poorly understood nationally, and few if any key messages can be drawn from consultation responses. There is a need to consider:

- Operational emissions – sites with strong development viability will tend to be well-suited to delivering net zero development, and there can also be particular opportunities associated with strategic sites (but there is limited reason to suggest that delivering heat networks is a realistic possibility).
- Non-operational (‘embedded’) emissions – a priority in the SW Herts Vision: *“Build responsibly with modern methods that reduce resource consumption and reuse materials.”* There is a particular opportunity at strategic sites and also in the SW Herts context, given the presence of [HERTS IQ](#).

### Green Belt

5.2.64 This was another prominent ‘driver’ of spatial strategy in 2023, and that remains the case at the current time. The Green Belt Review (2023) is a crucially important source of evidence; however, the key point to make here is that it is only one factor amongst many, when seeking to demonstrate ‘exceptional circumstances’ to justify releasing land from the Green Belt. The NPPF is clear that there is also a need to demonstrate *“sustainable patterns of development”* (NPPF para 147), and the Welwyn Local Plan Inspector notably stated in 2021 (N.B. reported to [LPAG](#) in 2022):

“Those sites that cause least harm to the green belt’s openness and purposes whilst at the same time favouring those that score best from a sustainability perspective should be chosen. These could be opposing forces; in which case a balance would need to be struck according to the weight of evidence.”

5.2.65 In practice, the Draft Local Plan (2023) departed from the Green Belt Review in two respects. Firstly, several small sites ‘recommended’ for further consideration by the Green Belt Review were not taken forward for allocation on account of quite clear-cut site-specific issues. Secondly, and more significantly, four strategic allocations were supported despite entirely (three sites), or partially (NE Harpenden), comprising land not recommended by the GB Review. The decision to support these four strategic sites was taken on balance following consideration of the wider social, environmental and economic factors, including in respect of infrastructure benefits, and in the context of a stretching LHN figure.

5.2.66 A key objective of work to explore reasonable growth scenarios in 2023 was to explore and test ways of responding to the findings of Green Belt review, balancing Green Belt sensitivity with wider factors from a “sustainability perspective”. This objective remains a focus of SA work at the current time.

5.2.67 Two final considerations are:

- The HBF raise a concern that the Green Belt Review is “flawed” because it does not examine land distant from a settlement boundary. However, the approach was proportionate, given clear arguments for focusing attention on land close to settlements (see Section 4.2.1 of the GB Review). Also, and as discussed, the Council is not blind to site options beyond those ‘recommended’ by the Green Belt review.
- The objective is not only to protect but also enhance the Green Belt. In this regard, it is important to note that strategic opportunities within the District are highly spatially specific, reflecting the diversity of landscapes and green/blue infrastructure issues and opportunities. Matters are explored in Section 5.4.

### Employment land

5.2.68 The approach taken in 2023 was informed by a needs assessment for SW Herts dating from 2019, which has now been updated, accounting for a changed picture nationally and regionally, particularly in respect of increased demand for industrial floorspace, and particularly for logistics and warehousing.

5.2.69 The effect of the updated needs assessment, which is discussed further below, is to significantly bolster what was already very strong support for a strategic expansion of the Maylands Estate, at the eastern edge of Hemel Hempstead / adjacent to M11 J8, as a central component of a wider strategy for Herts IQ.

5.2.70 Two further implications are: A) a need to remain open to wider options for new industrial land, although such arguments are limited, recalling what will also be delivered at the committed [SRFI](#); and B) a need to ensure suitable protection for existing industrial estates / business parks from conversion to residential, e.g. at London Colney. In this regard, there is a need to ensure a precautionary long term perspective.



## 5.3 Site options

### Introduction

- 5.3.1 The aim of this section is to introduce the site options that are available and feasibly in contention for allocation, and the proportionate work that has been undertaken to appraise sites in isolation. This is a 'bottom-up' input to the process of defining reasonable alternatives (growth scenarios; see Figure 5.1).
- 5.3.2 This section covers: 1) officer-led work; 2) Green Belt Review; 3) GIS analysis; and 4) consultation. The specific aim is to introduce workstreams that inform discussion of site options in Section 5.4.

### Officer-led work

- 5.3.3 The Housing and Economic Land Availability Assessment (HELAA) is a key starting point. It was published in 2023 and assesses a long list of site options against a standard set of criteria. The effect is to sift out a small number of sites, leading to an initial shortlist of 354 site options with a total capacity of 58,175 homes).<sup>8</sup> In addition, a further 215 sites are shortlisted on the basis of an Urban Capacity Study, although for many of these sites availability was subsequently established as an issue such that the site did not warrant further consideration. Finally, all shortlisted site options are assessed using under a standard set of criteria across a series of site 'proformas', informed by the Green Belt Review and consultation (2023).

### Green Belt Review

- 5.3.4 A version of the Green Belt Review was published in 2013/14, setting out work in two stages. However, concerns raised regarding Stage 2 led to a new Green Belt Review Stage 2 being published in 2023.
- 5.3.5 Stage 1 reached high level conclusions (see Figure 5.4), whilst Stage 2 gives detailed consideration to detailed land parcels, including HELAA sites falling within a 'settlement buffer' (discussed above).
- 5.3.6 Stage 2 reaches two conclusions for each land parcel: 1) Overall performance against the NPPF purposes (green shading in Figure 5.5); and 2) Strategic importance to the wider Green Belt (see blue, red and amber lines in Figure 5.5). Giving particular weight to the latter consideration, the Stage 2 Review then recommends land parcels for further consideration (either in isolation or in-combination) – see Figure 5.6.

### GIS appraisal of site options

- 5.3.7 Finally, as a means of providing supplementary evidence on site options, **Appendix V** presents the findings of an AECOM-led quantitative GIS-based exercise, involving examining the spatial relationship between site options and a range of constraint/push (e.g. biodiversity designations) and opportunity/pull (e.g. schools) features for which data is available in digitally mapped form for the District as a whole.
- 5.3.8 The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of each site (unlike HELAA). However, it is nonetheless a useful input to Section 5.4.
- 5.3.9 Also, it should be noted that this analysis is *as per* that presented in the Interim SA Report (2023), i.e. the GIS analysis has *not* been updated. This approach was considered proportionate, given the clear limitations of the analysis and, in turn, its limited role in the overall process (of defining growth scenarios).

### Consultation

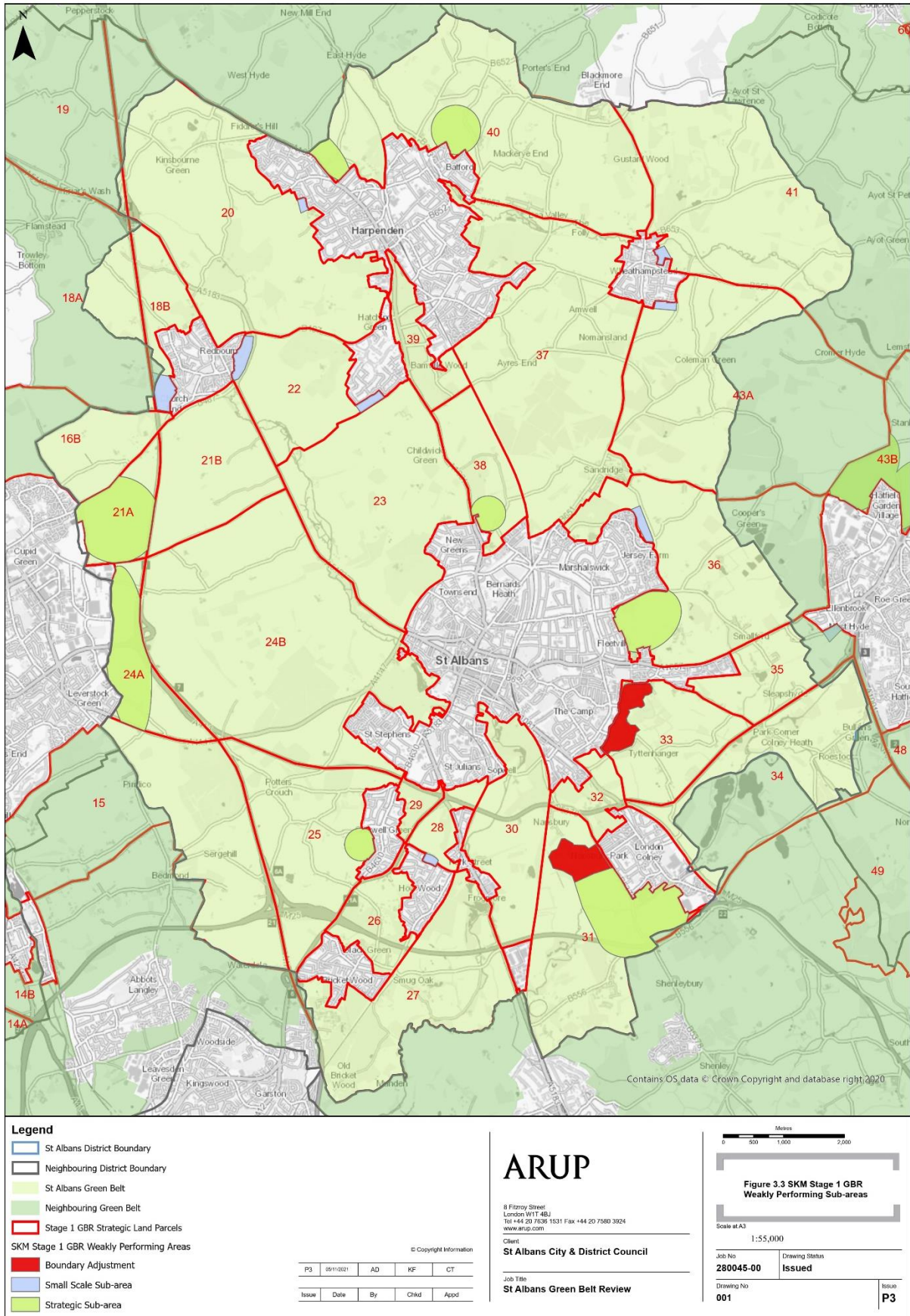
- 5.3.10 A very large volume of inputs was received from site promoters and objectors through the consultation in 2023. All consultation responses have been reviewed and key points are taken into account as part of the analysis presented in Section 5.4. However, it should be noted that few consultation responses were received referencing the analysis presented within the Interim SA Report (2023).

### Conclusion

- 5.3.11 Whilst site options are not reasonable alternatives (see Section 4), a proportionate amount of work has been undertaken to examine site options, involving both technical workstreams and consultation. Key analysis was presented in Section 5.4 of the ISA Report (2023) and is updated in Section 5.4 below.

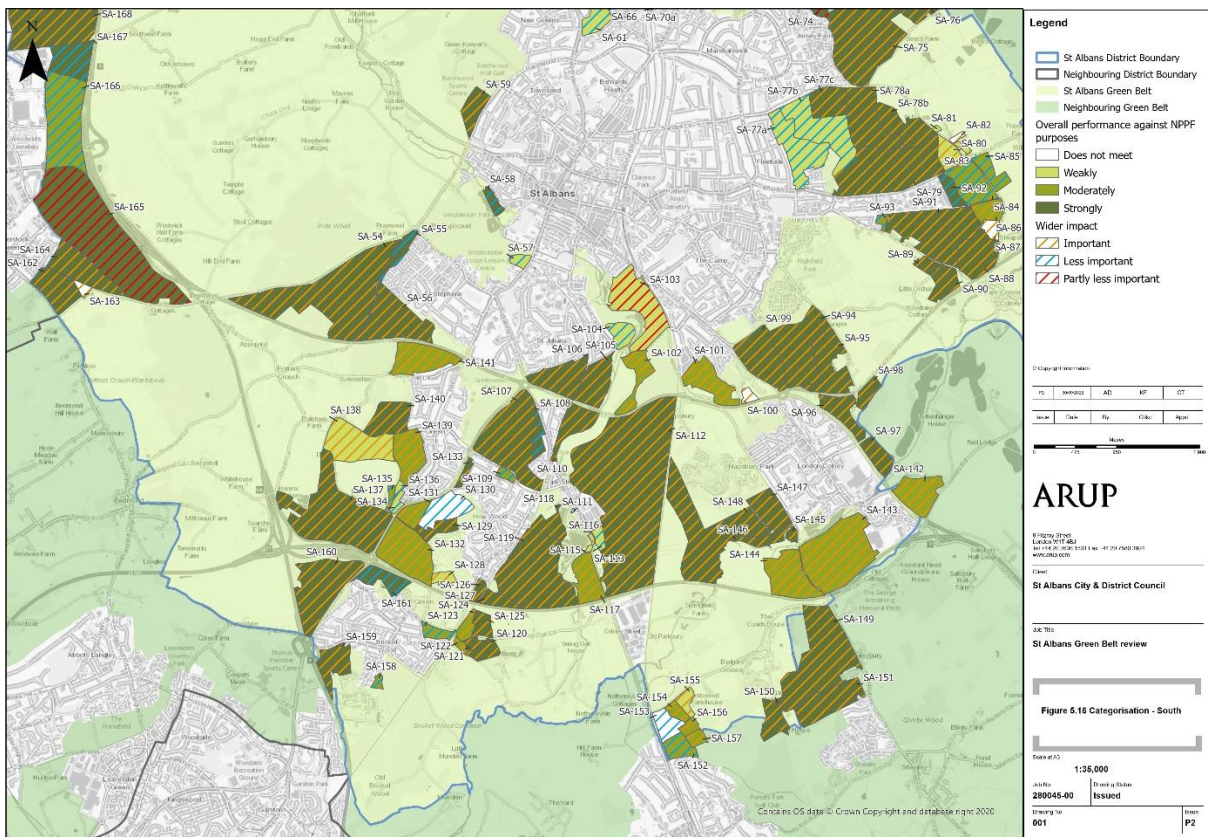
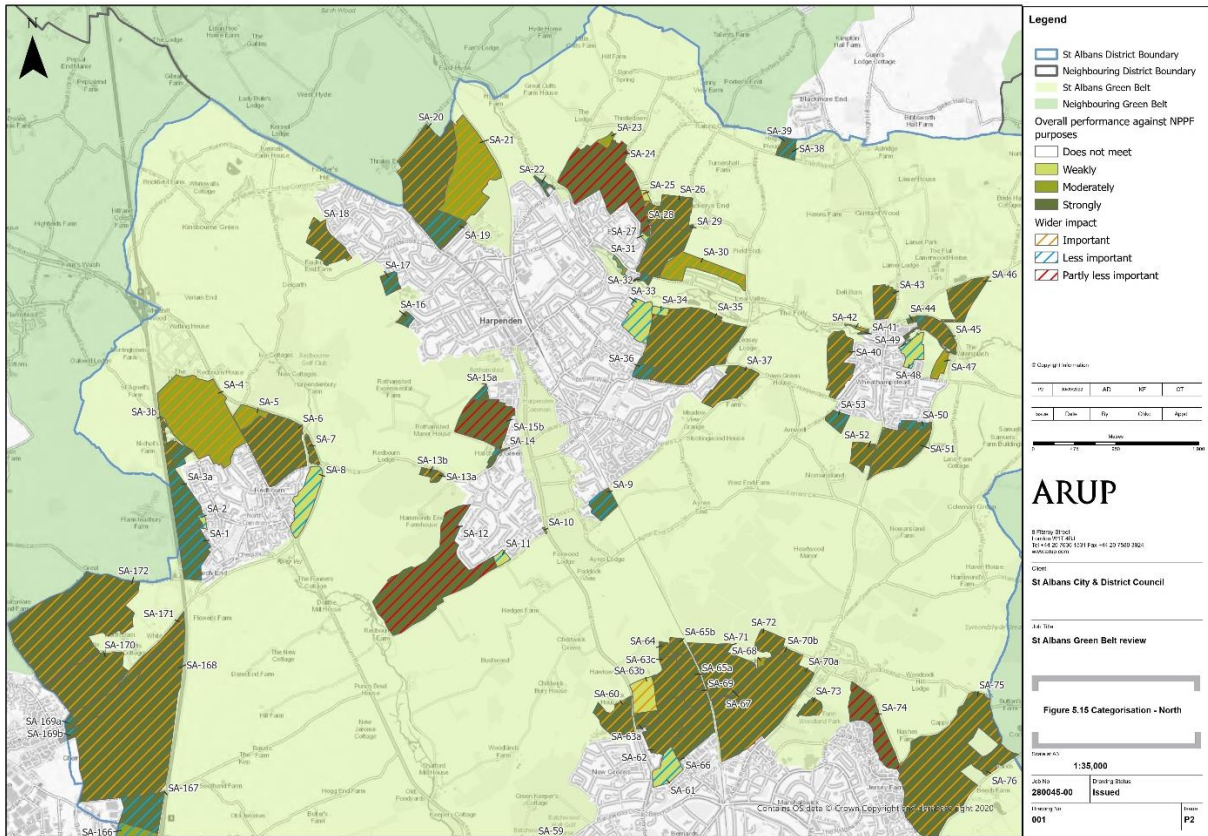
<sup>8</sup> In the great majority of cases sites were sifted-out through the HELAA due to availability concerns or due to being too small. Just nine sites were sifted out due to suitability concerns (flood risk in six instances, and heritage impact in three).

Figure 5.4: Weakly performing Green Belt areas identified through Stage 1 of the GB Review

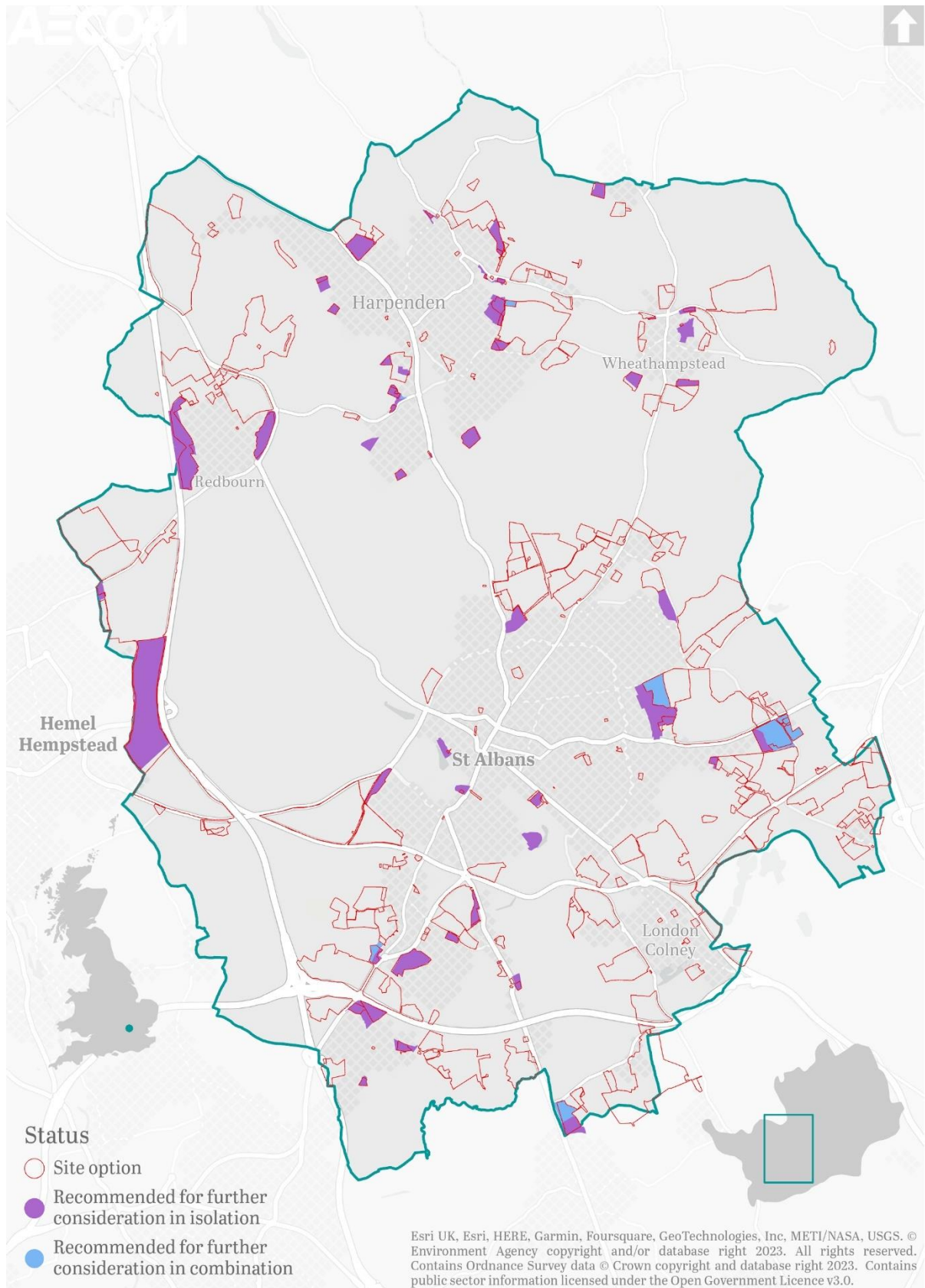


N.B. and to reiterate, this map was originally produced by SKM in 2013 for the Stage 1 Green Belt Review.

Figure 5.5: Findings of the Stage 2 Green Belt Review (north and south of the District)



**Figure 5.6: Green Belt Review recommended land parcels overlaid on select site options<sup>9</sup>**



<sup>9</sup> There are four points to note: **1)** The site options are from the HELAA (2023). **2)** HELAA sites set to deliver with the Government permitted SRFI and associated country parks are not shown. **3)** The figure aims to avoid showing overlapping sites, which typically means showing only the most recently submitted version, but in some instances a judgement call has been made regarding which version to show (e.g. showing the larger of two overlapping sites). **4)** The figure shows several recent sub-divisions of HELAA sites (i.e. sub-divisions made post publication of the HELAA) and one new site (at Rothamsted Research).

## 5.4 Sub-area scenarios

### Introduction

5.4.1 Discussion has so far focused on A) 'top down' considerations of strategic factors (growth quantum and broad spatial strategy); and B) 'bottom-up' consideration of site options. The next step is to consider each of the District's sub-areas in turn, exploring how sites might be allocated/ supported in combination.

#### What sub-areas?

5.4.2 There is a need to define sub-areas taking into account the pattern of settlement (first-and-foremost), parish boundaries and the distribution of realistic site options. The following sub-areas were defined:

- Edge of Hemel Hempstead (including Hemel Garden Communities, HGC)
- St Albans (inc. Colney Heath)
- Harpenden
- London Colney
- Redbourn
- Wheathampstead
- Bricket Wood
- Chiswell Green, How Wood and Park Street / Frogmore
- Edge of Radlett

#### Methodology

5.4.3 Within each sub-area the key task is to consider Green Belt site options, accounting for both strategic and site-specific factors. There is clearly less call to explore alternative approaches to urban supply.

5.4.4 When considering Green Belt site options, the first sites to consider are the **2023 preferred allocations**, i.e. from the Draft Local Plan stage. These are the purple and blue sites shown in Figure 5.7, below.

5.4.5 In particular, attention focuses first-and-foremost on those **strategic sites** proposed for allocation in 2023 that were **recommended** for further consideration by the Green Belt Review (solid purple sites in Figure 5.7). N.B. as a shorthand, the discussion refers simply to sites 'recommended' by the Green Belt Review.

5.4.6 The **two other broad categories** of Green Belt sites proposed for allocation in 2023 are then: A) strategic sites proposed for allocation despite not being recommended by the Green Belt Review (in whole or in part' see purple hatched sites in Figure 5.7); and B) non-strategic sites recommended by the Green Belt Review, which are shown as solid blue sites in Figure 5.7.

5.4.7 Subsequently, for each sub-area, consideration is given to **2023 omission sites** alongside any **new sites**.

5.4.8 The first point to note is that there are no such sites that are recommended by the Green Belt Review and realistically in contention.<sup>10</sup> As such, the discussion simply begins with consideration of strategic sites before moving on to consideration of non-strategic sites. Further considerations are:

- Shortlisted sites from 2023 – the strategic omission sites shown in red below were explored through the appraisal of RA growth scenarios, and the red outline sites were 'noted' in Section 5.4 of the ISA Report.
- Non-strategic omission sites from 2023 – discussions are brief given inherently limited case for allocating non-strategic sites not recommended by the Green Belt Review.
- Consultation responses – received in 2023 are referenced as appropriate, including some submitted concept masterplans, but it is recognised that site-specific proposals are subject to change.

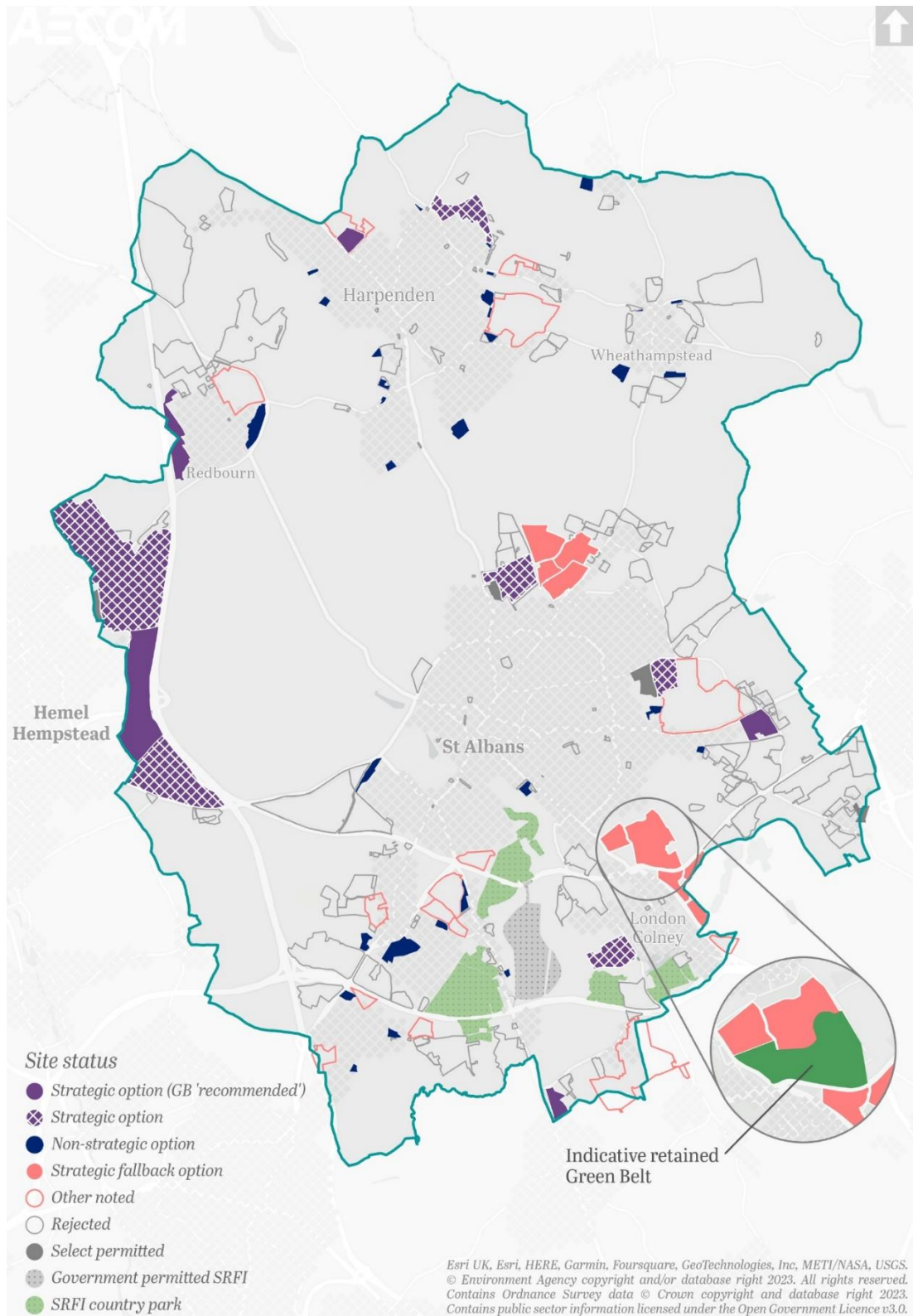
5.4.9 Finally, each of the sub-area discussions concludes with a section setting out the reasonable growth scenarios ('sub-area scenarios') that need to be taken forward to Section 5.5 of the report, where sub-area scenarios are combined in order to arrive at reasonable growth scenarios for the District as a whole.

<sup>10</sup> The ISA Report (2023) discussed the small number of sites recommended by the Green Belt Review but not proposed for allocation in the Draft Local Plan (2023). All were not proposed for allocation on the basis of clear cut reasons.

**Further note on methodology**

5.4.10 The aim is *not* to present a formal appraisal of reasonable alternatives. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to precisely the same level of detail, but rather to focus attention on those options (and site combinations / scenarios) *judged* to be more marginal, i.e. where the question of whether or how to take the option forward is more finely balanced. This approach is taken mindful of the legal requirement, which is to explain reasons for arriving at reasonable alternatives in “outline” terms.

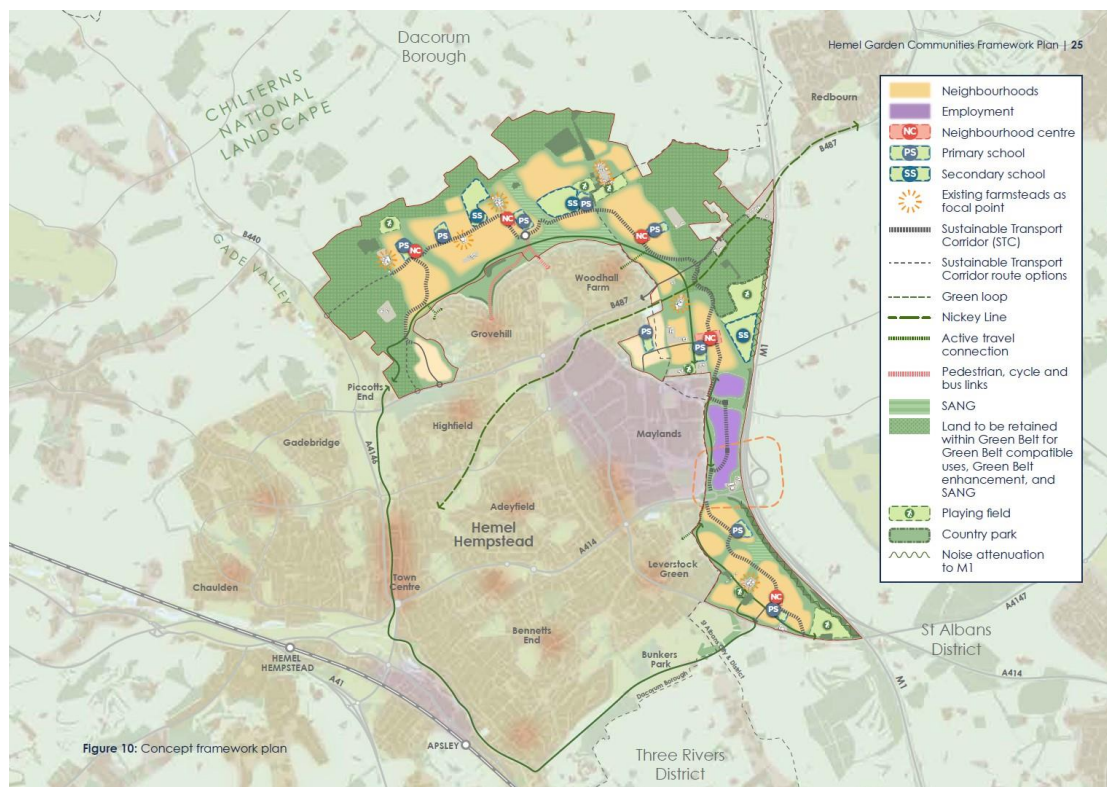
**Figure 5.7: Green Belt sites categorised in 2023 (drawn upon now as *an input to work in 2024*)**



## Edge of Hemel Hempstead (inc. Hemel Garden Communities)

- 5.4.11 For maps showing the site options see the [Redbourn](#) and [St. Michael](#) HELAA maps.
- 5.4.12 Nearly all land within the District abutting the edge of Hemel Hempstead is associated with the Hemel Garden Communities (HGC) project, which is strongly supported in wide ranging respects, as discussed.

**Figure 5.8: The HGC concept plan (June 2024)**



- 5.4.13 Beginning with the proposed **employment area**, which falls entirely within St Albans, it is not only of larger-than-local strategic importance, including noting that it is nationally designated as an Enterprise Zone (as part of the Herts Innovation Quarter (IQ); see 'Crown Land' [here](#)), but the land is also 'recommended' by the Green Belt Review. In this light, its allocation was a 'constant' across the RA growth scenarios in 2023.
- 5.4.14 Moving to the **north**, the District boundary can be seen on the figure above, running to the north of Woodhall Farm, and then turning to the east, towards Redbourn. Within St Albans there is a significant quantum of land proposed for housing (including land at Spencer's Park with outline planning permission, shown with a lighter shading), plus there is land identified for a secondary school, but around half of the land is proposed for greenspace, including land close to Redbourn proposed for Green Belt enhancement.
- 5.4.15 Land in this sector is not recommended by the Green Belt Review, which was a key factor influencing the decision to test the option of 'no growth' through work to explore growth scenarios in 2023. However, support for growth here has increased since 2023. The strategic case has already been introduced in Section 5.2, but on a more detailed level there are two important points to make:
- The Crown Estate – is the key landowner to the east of Hemel Hempstead, owning nearly all land within the HGC area south of the B487 Redbourn Road. The Crown Estate has recently agreed a Planning Performance Agreement (PPA) with the Council, with a view to delivering the employment land alongside ~4,000 homes in this area (i.e. land to the east of Hemel, either side of the employment area).
  - Strategic road access – to the housing sites north of the B487 / Woodhall Farm must pass through the Crown Estate Land to the east of Hemel. The housing sites in this area are in the control of developers, and the development area is split roughly 50/50 between St Albans and Dacorum. It is particularly important for Dacorum that this land is able to come forward in a timely fashion, as there is less certainty around development in the northwest sector of HGC (i.e. the sector falling entirely within Dacorum). Part of the land here is in the control of the Crown Estate but is not covered by the aforementioned PPA.

5.4.16 Also, with regards to the northern sector, there is a need to note a very extensive consultation response received from Redbourn Parish Council in 2023. There are three key points to make in response:

- A wide range of concerns are raised regarding the plan and plan-making process as a whole, which need not be a focus here, but it is important to question the following (emphasised in the response): *“The Draft Local Plan contains no justification for contradicting the recommendations of its own Green Belt Review. This should effectively remove [HGC north of the proposed employment area].”* In this regard, it is important to note the extensive work undertaken through the SA process.
- The section on HGC focuses on the timescale for delivery, and the need to ensure that HGC is planned-for with a very long term perspective, including with a view to good/effective infrastructure planning. This is acknowledged, and it is important to state in response that much work has been ongoing around this.
- Other specific concerns raised (across the consultation response as a whole) are notably around employment land (the justification for the proposed strategic employment land is questioned); the constraint posed by major pipelines linked to Buncefield Oil Depot; and a lack of evidence to inform spatial strategy / site selection, including in respect of transport modelling, flood risk, landscape sensitivity, heritage impact and agricultural land. These are all matters explored further below.

5.4.17 Finally, with regards to the northern sector, there is a need to note the consultation response received from the Campaign to Protect Rural England (CPRE). A host of concerns are raised, which are all explored further below, but the following points warrant being made here:

- CPRE explain: *“Our opposition begins with the use of the term “garden communities”... Its early influence was considerable but the approach has been diluted since by the general addition of the word ‘garden’ to any number of low density residential proposals without consideration of the community and social infrastructure intrinsic to the original concept.”* However, work through the SA process in 2023 found growth scenarios with HGC to perform very well in terms of community and social infrastructure, both relative to the alternatives and in absolute terms. It is also fair to say that this is a message that comes through clearly in key consultation responses, including that from the County Council.
- A key concern raised is that HGC would “impact hugely” on the Chilterns National Landscape (formerly AONB). This is obviously a key sensitivity / issue explored further below, but an important point to note here is that the Chilterns AONB Board did not respond to the consultation in 2023. Also, support for HGC to the east and northeast of Hemel Hempstead potentially serves to reduce pressure on the part of the HGC area to the north, which is likely the most sensitive in landscape / National Landscape terms.
- CPRE also discuss the Chilterns Beechwoods SAC constraint. However, in this regard there is a need to give weight to the views of Natural England. This is discussed further below, but ultimately there is no objection to HGC, subject to further detailed work, including in respect of ensuring Suitable Alternative Natural Greenspace (SANG) capacity and ensuring that new homes are able to viably contribute to Strategic Access Management and Monitoring (SAMM). NE recognise that *“the overarching ambition is that the vision for the development, its design and delivery is co-ordinated across the two authorities.”*
- The suggestion is that HGC would result in “effective coalescence” of Hemel Hempstead and Redbourn, but it is clear that a substantial green buffer would be retained through planting and provision of green spaces including the Country Park and SANG (see Figure 5.8), a separation of at least 1.5km between the built development of HGC and Redbourn’s settlement edge being retained. Having said this, the proposed western expansion of Redbourn is noted (see discussion below), and it is also recognised that there is some built form within the propose green buffer. Further evidence comes from the consultation response (including a vision document) submitted on behalf of the landowner (Pigeon) in 2023 (ref. 809).

5.4.18 Finally, there is a need to consider land to the **south** of the employment area, closely associated with Leverstock Green. This is Crown Estate Land, as discussed, and is proposed to deliver a significant proportion of the aforementioned ~4,000 homes. The northern part of this land area (adjacent to the proposed employment area) is recommended by the Green Belt Review, but the majority is not. In turn, the question arises as to whether a more restricted approach to growth might be supported in this area.

5.4.19 As part of this, it is recognised that some significant concerns were raised by the Leverstock Green Village Association (LGVA) through the consultation in 2023. The LGVA “recognise the vision of HGC” but suggest that this sector could be suited to ~1,000 homes rather than the 2,400 homes envisaged in the Draft Local Plan. Specific concerns include the historic/character sensitivity of Leverstock Green (there is a notable density of listed buildings; see historic mapping [here](#)) and concerns around road infrastructure. Finally, a concern is raised regarding development in St Albans District impacting negatively on a community in Dacorum Borough, but in this respect it is important to note that Dacorum BC are supportive.



- 5.4.20 To conclude on the southern sector, it is easier to envisage a scenario involving significantly reduced growth than is the case for the northern sector. However, the recently agreed PPA with the Crown Estate serves as an argument against this, plus there is a need to recognise the proposal to deliver two primary schools in this area and new strategic road infrastructure linking to the A4147. Furthermore, land adjacent to the south of Leverstock Green and the A4147 (outside of the HGC area) is proposed for a secondary school, to serve wider Hemel Hempstead growth, which boosts the case for housing growth in this area.
- 5.4.21 One very final consideration is a new **Green Belt PDL site** made available in 2023, and now considered suitable for allocation, namely Friends Meeting House, Blackwater Lane (15 homes). It is located adjacent to the southern edge of the HGC area, to the east of Leverstock Green. If delivered in isolation it would not connect effectively to Leverstock Green, but it is in active use such that the landowners will likely look to bring it forward broadly in line with adjacent HGC. The existing community use, severance by the A4147 (including safe crossings) and existing mature field boundaries are considerations for this site.
- 5.4.22 In **conclusion**, matters around HGC are introduced in Section 5.2, expanded upon here, and are a focus of much further detailed discussion below in Section 9. The key question to answer here is whether HGC should be a 'variable' across the reasonable growth scenarios (Section 5.5), as per the approach taken in 2023, or whether it should now be treated as a 'constant'.
- 5.4.23 On balance, the decision reached is that HGC warrants being treated as **a constant**, in light of the latest evidence and understanding, including via the consultation in 2023. An overriding consideration is that the St Albans Local Plan simply could not progress to the Regulation 19 stage without HGC, i.e. there would be a need for further consultation under Regulation 18, leading to major issues in terms of a risk/likelihood of Government intervention and a further prolonged period of struggling to defend against planning applications due to the presumption in favour of sustainable development. Also, it seems highly likely that the Dacorum Local Plan would struggle to progress, and there is the wider context of unmet housing and employment land needs in SW Herts (and, more generally, growth strategy, including HERT).
- 5.4.24 It is equally the case that these issues would arise under a scenario involving support for low growth, as per the low growth scenario appraised and subjected to consultation in 2023. This scenario has a degree of merit, in that the employment land would be delivered alongside a modest extension to the east of Leverstock Green on land recommended by the Green Belt Review. However, it is not clear that this would be deliverable (alongside infrastructure, e.g. a new primary school) and there would be pressure for further expansion ('creep') in the direction of the proposed new secondary school (south of the A4147).
- 5.4.25 There is feasibly the possibility of reducing the scale/extent of growth somewhat at the southern extent of the area, and possibly also at the northeast extent (less clear/significant), but there is no clear case for doing so, and even fairly modest adjustments could lead to a risk of delay to the plan-making timetable.
- 5.4.26 Since 2023, work has been undertaken to explore scenarios through the HGC programme (see separate HGC evidence base work), but this has mainly focused on varying the configuration of growth in the Dacorum part of the HGC area (including because of the landscape sensitivity in association with the Chilterns National Landscape and Gade Valley), with the approach to growth in St Albans mostly held constant across the scenarios. Indeed, the approach to growth in the southern part of the St Albans HGC area (i.e. the part discussed above as potentially open to refinement) is held entirely constant across the scenarios appraised. Ultimately, the conclusion is reached that the concept plan shown above strikes the best balance between avoiding/addressing issues and realising benefits, and this conclusion is supported.
- 5.4.27 Providing for Gypsy and Traveller accommodation needs is one key factor that has been a focus of work, and it is the case that the importance of HGC in respect of providing Gypsy and Traveller pitches to meet locally arising needs from St Albans and the wider sub-region has crystallised since 2023.
- 5.4.28 Finally, it is recognised that there is a separate question regarding delivery timescales, including the number of homes in the plan period – see Section 5.5.
- 5.4.29 Supplementary information is presented below as follows:
- Box 5.3 – presents the equivalent discussion from Section 5.4 of the ISA Report (2023). It demonstrates that the conclusion reached at the time to progress HGC as a 'variable' was marginal.
  - Box 5.4 – presents the conclusions reached on HGC following the appraisal of RA growth scenarios presented in Section 6 of the ISA Report (2023). In short, the appraisal found scenarios without HGC to perform poorly, and this is a factor that feeds into the current decision to hold HGC constant.

**Box 5.3: Discussion of HGC from Section 5.4 of the ISA Report (2023)**

“[HGC] has strong support amongst partner organisations (St Albans City and District Council, Dacorum Borough Council, Hertfordshire County Council, Hertfordshire Local Enterprise Partnership and Hertfordshire Innovation Quarter). Dacorum’s local plan is delayed, but given constraints to growth, in particular the Chilterns Beechwoods Special Area of Conservation (SAC), there will likely be heavy reliance on HGC to deliver homes, including given the potential to deliver extensive Suitable Alternative Natural Greenspace (SANG). Much work has been completed, and is ongoing, that explores HGC as a whole, and there has *not* been a focus on exploring scenarios involving significantly reduced growth within the St Albans part. Notably, the September 2022 presentation to the St Albans Local Plan Advisory Group (LPAG) explained that scenarios are being examined involving between c. 9,600 – 11,500 new homes (with a focus on exploring implications for three key issues, namely the Gade Valley, SANG provision and secondary school provision). The presentation also explained that: *“Infrastructure modelling and financial viability assessment [is] underway.”*”

In this light, it is clearly the case that the HGC scheme would likely struggle to progress without the St Albans components, which are notably distant from the Gade Valley and proposed for secondary school provision, employment provision and a large proportion of SANG provision.

HGC is very important for the sub-region (i.e. is of 'larger-than-local significance), just as Harlow-Gilston Garden Town is of crucial importance for its sub-region (Harlow, Epping Forest and East Herts).

Furthermore, there is a strong argument for HGC when viewed through a St Albans district-specific lens. This reflects both the inherent opportunities associated with strategic growth, in terms of comprehensive masterplanning and planning for infrastructure... and also location-specific opportunities, including supporting the aspirations for the A414 corridor... and delivering [a key] element of the Hertfordshire Enterprise Zone...

Without HGC there would clearly be a need to make very difficult decisions in respect of: A) not meeting housing and employment needs (i.e. generating unmet needs); and/or B) releasing land from the Green Belt at the edge of settlements (given a lack of new settlement options locally). There is every chance that such decisions would prove politically too difficult, such that there would be a risk of the Local Plan failing, as per the last two attempts to deliver a local plan. On this note, it is important to recall that the current St Albans Local Plan is the second-oldest local plan nationally... [and likely soon to be the oldest, as the York Local Plan is near adoption].

A further specific issue is meeting Gypsy and Traveller accommodation needs, with it being apparent that the St Albans Local Plan would likely generate significant unmet need in the absence of HGC, in the context of a sub-region where unmet need is already an issue (or, at least, a potential issue).

However, on the other hand, HGC is associated with a range of issues such that there is a need for further testing. The Chilterns Beechwoods SAC issue is foremost, potentially followed by the Chilterns AONB, but there are a range of other issues that warrant further consideration at the Local Plan stage.

The question is whether or not it is appropriate to test the 'no HGC' option, given strong arguments to suggest that this option is unreasonable, and mindful that testing this option could serve to distract from, and limit the potential to explore, other choices for the Local Plan. Ruling out 'no HGC' as unreasonable might represent best practice; however, doing so could generate a risk of challenge...”

**Box 5.4: Discussion of HGC from Section 6 of the ISA Report (2023)**

“[There] are a range of issues and tensions with sustainability objectives, which is inevitable given the scale of HGC, and there are also a range of uncertainties... despite work having been ongoing for several years (potentially reflecting the fact that work has been undertaken in the context of policy uncertainty).

However, there is clear evidence to suggest that, for a wide range of sustainability objectives, St Albans Local Plan scenarios without HGC give rise to greater concerns than is the case for scenarios with HGC, whether that is a low growth scenario (Scenario 1) or a scenario whereby HGC is replaced by strategic urban extensions (Scenario 3). Furthermore, without St Albans support for HGC it may not be possible for Dacorum to take HGC forward, with implications for the Dacorum Local Plan and, in turn, wider knock-on effects. It is crucially important to consider the merits of HGC in this wider strategic context.

Scenarios including HGC perform well in terms of:

- Accessibility – there is a major opportunity to deliver community infrastructure alongside new homes, including secondary school capacity and including to the benefit of existing communities locally.
- Biodiversity – it is key to deliver new homes alongside Suitable Alternative Natural Greenspace (SANG) in west St Albans and Dacorum. Also, HGC is fairly unconstrained in wider biodiversity terms.

- Climate change adaptation (flood risk), historic environment, land (particularly best and most versatile agricultural land) and landscape – the St Albans HGC area is fairly unconstrained, again mindful of where/how this quantum of homes might alternatively be delivered. Proximity to the Chilterns AONB is noted, as is ongoing Chilterns AONB boundary review. Also, the land is mostly not “recommended for further consideration” by the Green Belt Review. However, landscape and Green Belt concerns can be mitigated, including via strategically located SANG and a new country park. Also, support for the St Albans components of HGC would serve to minimise pressure on the Gade valley in Dacorum.
- Climate change mitigation – large-scale strategic growth can lead an opportunity to minimise built environment emissions per head of population (‘per capita’), with transport emissions also key.
- Economy – Scenarios 1 and 3 assume that a strategic expansion of the Maylands Estate could be delivered without support for wider HGC, but this is uncertain, and would clearly be sub-optimal.
- Historic environment – although there will be impacts to a historic rural landscape including historic farmsteads, and proximity to the Gorhambury Estate (to the east) is noted.
- Homes – the scenarios assume that it could be possible to provide for LHN without HGC (Scenario 3), but this is uncertain (noting the drawbacks to Scenario 3). A related key issue is providing for Gypsy and Traveller accommodation needs, with HGC likely very important...
- Transport – growth at this scale leads to clear opportunities, around minimising the need to travel and supporting modal shift, and there are certain inherent locational opportunities (support for A414 corridor aspirations, including HERT; proximity to employment; and also the Nickey Line), however, it is recognised that new communities would be quite distant from a town centre and a train station.

Whilst the appraisal has given detailed consideration to ‘no HGC’ scenarios, in light of the appraisal there is an argument to suggest that such scenarios are unreasonable, and attention might more usefully focus on scenarios that vary less in respect of HGC and more in respect of urban extensions elsewhere.”

## St Albans

- 5.4.30 For maps showing the sites see the [Colney Heath](#), [Sandridge](#), [St. Michael](#) and [St Albans](#) HELAA maps.
- 5.4.31 As the District’s primary town there is a clear need to direct a good proportion of growth to St Albans, with no clear case for a low growth strategy (with commensurately higher growth elsewhere). For example: St Albans is not particularly constrained in biodiversity terms when viewed in the sub-regional context; there is good rail connectivity; and, whilst traffic is an issue, the A414 corridor represents an opportunity (HERT).
- 5.4.32 When considering reasonable growth scenarios, the starting point is supply from:
- Completions and commitments – total 1,676 homes, which is 42% of the District’s total. This broadly aligns with the proportion of the Districts housing stock within the City (~54%).
  - Windfall – the assumption is 1,283 homes, which is 61% of the District’s total.<sup>11</sup>
  - Proposed urban supply – 586 homes, which is 65% of the District total.
- 5.4.33 These sources of **non-Green Belt supply** total 3,545 homes. Furthermore, there are two Green Belt PDL sites with a total capacity of 144 homes and which are strongly supported for allocation. Both sites are associated with issues / challenges, including in light of consultation responses received in 2023, and including from an accessibility and placemaking perspective. However, the reality is that NPPF para 154 supports the principle of development at sites such as these, noting considerable existing built form. Neither site is discussed further here (Section 5), but both sites are discussed further in Section 9.
- 5.4.34 The above discussion indicates a clear strategic case for Green Belt release at St Albans. This is in the context of the stretching LHN figure (14,603 homes), and accounting for non-Green Belt supply elsewhere (~2,900 homes) and HGC (~4,300 homes). The remaining residual figure is ~3,850 homes, and the option of simply not providing for this figure is unreasonable, including as that this would generate a need for another Regulation 18 consultation (with associated issues, as discussed). The Draft Local Plan (2023) proposed seven Green Belt allocations (in addition to the two PDL sites) for a total of 2,236 homes, and there were few concerns raised with this broad strategy (as discussed). As such, it is difficult to envisage a reasonable scenario involving less than ~1,000 homes from Green Belt allocations at St Albans.

<sup>11</sup> Windfall sites are those that can be assumed to come forward despite not being an allocation, in line with District-wide policy.

5.4.35 **Green Belt options** can be placed into a *broad* sequential order of preference:

5.4.36 A starting point is **Glinwell, Hatfield Road** strategic urban extension, located at the far eastern edge of St Albans (Smallford). Land here primarily comprises a series of glasshouses (Glinwell Plc), with an area of greenspace to the west (associated with a stream, known as Butterwick Brook). Land here is recommended for further consideration by the Green Belt Review *and* there is the potential to deliver a strategic scale scheme (436 homes), although it would not deliver a primary school. Another factor in support of development is the previously developed nature of the majority of the site; however, on the other hand, this also leads to challenges, including given the value of the existing greenhouses. Beyond this there are other challenges associated with growth here (see Section 9). However, on balance, the option of growth here is considered to be the best performing Green Belt release option at St Albans. A final consideration is the need to consider the site alongside the possibility rationalising built form across the adjacent community of Smallford, including noting the consultation response from Nottcutts (ref 910).

5.4.37 Second, there are four **non-strategic sites** recommended by the GB Review, of which three are strongly supported and one gives rise to some concerns (Bedmond Lane):

- Verulam Golf Club (65 homes) – benefits from very good proximity to the town centre. A detailed representation from the site promoter suggests the potential for 85 homes, and this is shown in the photo montage below. The montage also shows two permitted schemes (shown as white) and the northern part of the golf course. The golf course is notably in two parts, with the southern half more wooded and sensitive in biodiversity and heritage terms, as the former parkland of Sopwell House.
- Bedmond Lane (70 homes) – is located at the western edge of the city, again well linked to the town centre (via Verulamium Park). This is a sensitive site from a biodiversity and historic environment perspective, with some significant objections received through consultation in 2023, and the land is designated as an [Asset of Community Value](#). With regards to biodiversity, the site is not shown as priority habitat by the nationally available dataset but is understood to comprise valued chalk grassland habitat and supports legally protected Lizard Orchid. With regards to the historic environment, the northern third of the site is sensitive in terms of archaeology, to the extent that this is likely a constraint to development, i.e. archaeology should remain in situ. Also, two significant footpaths pass through the site, linking the town and Verulamium Park to the countryside. However, much detailed work has been undertaken, and there is confidence in the potential to deliver homes in a way that avoids impacts to the most sensitive parts of the site and delivers benefits. Site capacity has been reduced from 78 homes.
- Boissy Close (49 homes) – was [granted](#) planning permission subject to S106 in August 2023.
- North East of Austen Way (37 homes; N.B. previously “east of Kay Walk”) – access is challenging and there is some biodiversity sensitivity, noting onsite priority habitat and an adjacent ancient woodland LWS, but the site is well contained in the landscape, and very close to primary and secondary schools.

**Figure 5.9:** Site promoter vision for Verulam Golf Club (2023), also showing the north of the course



- 5.4.38 Third, is **North St Albans** strategic urban extension, which comprises agricultural fields to the east of Harpenden Road (and a recently permitted scheme for 150 homes; ref. [5/2021/0423](#)) and north of St Albans Girls School and St Albans Enterprise Centre. Whilst the site is sensitive in Green Belt terms (it is not 'recommended' by the Stage 2 study, as shown in Figure 5.5, but was highlighted through the Green Belt Review Stage 1, as shown in Figure 5.4), there is a considerable growth opportunity, including in respect of delivering a neighbourhood centre and cycle infrastructure. Another consideration is that the land has been surveyed in detail and been found to mainly comprise grade 3a quality land (i.e. the lowest grade classed as best and most versatile, BMV). The assumption is 947 homes (not including the adjacent permitted site for 150 homes) which is slight reduction from the proposal in 2023. The northernmost part of the site (north of a tree belt) would be retained in the Green Belt.
- 5.4.39 Fourth, is **East St Albans** strategic urban extension, which comprises a series of agricultural fields adjacent to the northwest of Oaklands College (the landowner), to the south of Sandpit Lane and east of a recent urban extension. The Green Belt situation is as per North St Albans, but a benefit of this site is the potential to deliver a secondary school as well as a primary school, which led to a conclusion in 2023 that this is a sequentially preferable site to North St Albans. It should also be noted that this was a proposed strategic allocation in the previous version of the St Albans Local Plan as withdrawn in 2020.
- 5.4.40 Work has been ongoing to consider the best location for a school, and the latest proposal is for the school to be located to the east of Oaklands College (adjacent to the northwest of Glinwell, as discussed above). Specifically, it would be located adjacent to the east of a proposed new Oaklands Sports and Community Zone, an approach that clearly has merit but warrants ongoing scrutiny, including as work is ongoing to confirm precise arrangements in respect of delivering a new secondary school in this area. Finally, it should be noted that capacity is reduced from 522 to 472 homes at the current time (relative to 2023).
- 5.4.41 Fifth is **SE St Albans** strategic urban extension, which was not proposed as an allocation in the Draft Local Plan (2023), but which was closely considered through the appraisal of reasonable alternative growth scenarios (specifically, see Scenario 3). This sector of the settlement edge benefits from relative proximity to the city centre and train station, as well as good access to the strategic road network, but this is a sensitive landscape gap between St Albans and London Colney. Another consideration is that the land is in two separate landownerships, with land to the west in the control of a developer, but land to the east owned by the County Council. Land to the west was promoted through the consultation in 2023 (300 homes and strategic open space; the SA was not referenced), but land to the east was not promoted (but has been promoted in the past). Moving forward, it is fair to assume that the site as a whole could be allocated for a comprehensive scheme for ~800 homes, but there is clearly some uncertainty.
- 5.4.42 Sixth is an **expanded North St Albans** strategic urban extension, specifically comprising land to the east of the railway line, which again was not proposed as an allocation in 2023 but was closely considered in the ISA Report, as per SE St Albans. There is a case for comprehensive growth to the north of St Albans, securing a rounded settlement edge, strategic gaps to Harpenden and Sandridge, buffering and potentially enhancing Heartwood Forest and potentially delivering a new secondary school. However, there are clear access and transport challenges, with Sandridgebury Lane unlikely to be suitable for any increase in traffic and the B651 having limited or no potential to be upgraded. A concept plan has been submitted for a combined scheme (i.e. North St Albans plus land to the east), which proposes 1,400 homes (fewer than the 2,170 homes assumed in 2023), but it otherwise generates limited confidence in respect of how key issues would be addressed, and there are thought likely to be some unresolved land ownership issues.
- 5.4.43 **Other options** for strategic urban extensions perform less well, and so can be ruled out with relative ease, given sequentially preferable sites (as listed above) and a broad understanding of the maximum number of homes that would be needed from St Albans urban extensions under any reasonable scenario:
- Expanded East St Albans strategic urban extension – the possibility of comprehensive growth to the east of St Albans warrants ongoing consideration. Specifically, this would involve comprehensive planning for the entire sector of land to the east of St Albans, to include Oaklands College (a 'Development Zone' designation is proposed), the proposed Oaklands Sports and Community Zone, a secondary school, other community uses and housing. The aim would be to realise opportunities in respect of delivering a good mix of uses and infrastructure, align with environmental planning objectives (there is notable woodland, including Local Wildlife Sites, with other woodlands nearby to the east) and ensure defensible strategic gap to Welwyn Hatfield. However, Oaklands College is focused on delivering sports and community uses within the proposed new Sports and Community Zone alongside enabling housing in the form of the proposed East St Albans site discussed above. Another factor is that land in this area has been surveyed and found to comprise best and most versatile (BMV) agricultural land.

- Southwest St Albans – a vision document was submitted in 2023 (ref 906) proposing a first phase of 450 homes, and then a second phase resulting in a total urban extension of 1,400 homes to include a primary school and a new country park – see Figure 5.10. The potential for a cycle infrastructure upgrade to better link St Albans and HGC might also be envisaged (and is a priority in the LCWIP). However, the site is problematic in Green Belt terms, including noting the proximity of HGC (albeit the corollary is good proximity to strategic employment at HGC). There would be a need to consider the site in combination with Bedmond Lane (discussed above), and there would also be a need to consider the intervening parcel of land (shown as a brown field in Figure 5.10), which is owned by the Gorhambury Estate, and which could be well suited to delivering new woodland / habitat. A further consideration is possible archaeological constraint (see mapping of sensitive areas [here](#)).
- Other strategic urban extension options – are very difficult to envisage. Attention potentially focuses to the south, either side of the River Ver corridor, but there are a range of sensitivities including Sopwell House Conservation Area and former parklands (now the southern part of Verulam Golf Course) and the clear case for maintaining a landscape gap to Park Street (despite the intervening A414).

**Figure 5.10:** Site promoter vision for SW St Albans (2023)



5.4.44 **Other non-strategic options** – are inherently judged to perform poorly on the basis of not being recommended by the Green Belt Review (and on the basis of being non-strategic). Notable sites include:

- East of Napsbury Lane – located at the southeast extent of St Albans, to the north of Napsbury Park / northwest of London Colney / west of Birklands Park and promoted for 150 homes and a later living facility (ref 681). The site benefits from a degree of containment, but there is clear value in a landscape gap to London Colney, and the site likely has greenspace value given a footpath around its entire perimeter. The adjacent industrial estate (north) and nursery (south) could suggest a possible coordinated scheme, along with Albert Bygrave Retail Park, which is a proposed allocation.
- Batchwood Drive – located to the west of St Albans, and in good proximity to the town centre, the site is being promoted for 200 homes plus a large area of new accessible greenspace (ref 806), which would benefit the District's most relatively deprived neighbourhood. However, land to the west of St Albans is clearly sensitive on account of: the River Ver corridor following the Redbourn Road, strongly associated with Roman Verulamium, with rising land to the Gorhambury Estate to the south, and to Batchwood (house, sports centre and golf course / former parkland; not listed but valued) to the north, and with extensive woodlands and highly valued long distance footpaths. The site is clearly problematic in Green Belt terms, although it would draw upon a historic field boundary for containment, and this is *relatively* low lying land associated with the river corridor. The land is owned by Gorhambury Estate, and an aspiration could be to improve accessibility to the estate (currently there are no public rights of way across a very large area, although Gorhambury Drive is a permissive footpath).
- East of Boissy Close (i.e. east of the emerging proposed allocation discussed above) – there is a small parcel of land being promoted for 40 homes (ref 824; also a pending planning application for 26 homes, ref [5/2023/2308](#)); and then part of the wider parcel of land to the north is being promoted for 190 homes (ref 653; also a pending application, ref [5/2023/1923](#)). However, the wider parcel comprises former landfill and, accordingly, Green Belt containment is challenging. Also, the wider land parcel is designated Local Wildlife Sites (LWS) and the city centre is ~2.5km (albeit with good cycle connectivity).

- Sandpit Lane – is located to the east of St Albans, to the north of the Oaklands College land discussed above, and is being promoted for 200 homes (ref 807). It is distant from the town centre and performs poorly in terms of Green Belt / containment (alternative development quantum / configurations might be envisaged). There would be a clear case for planning comprehensively for the Oaklands Park land ahead of (or alongside) the site in question. Also, it is noted that land to the north comprises a small caravan park and then further to the north is a Gypsy and Traveller site.
- Centurion Club – is a golf club located in between St Albans and Hemel Hempstead, adjacent to the M1. The consultation response received in 2023 (ref 727) proposes a retirement village, but there are clear reasons to suggest that this would not be well-located. The site is adjacent to the southern-most point of the HGC project area, but the proposal here is to deliver an area of strategic greenspace.

5.4.45 Finally, there is a need to give brief consideration to two nearby lower order settlements washed over by the Green Belt, namely Sandridge and Colney Heath, where numerous sites are being actively promoted:

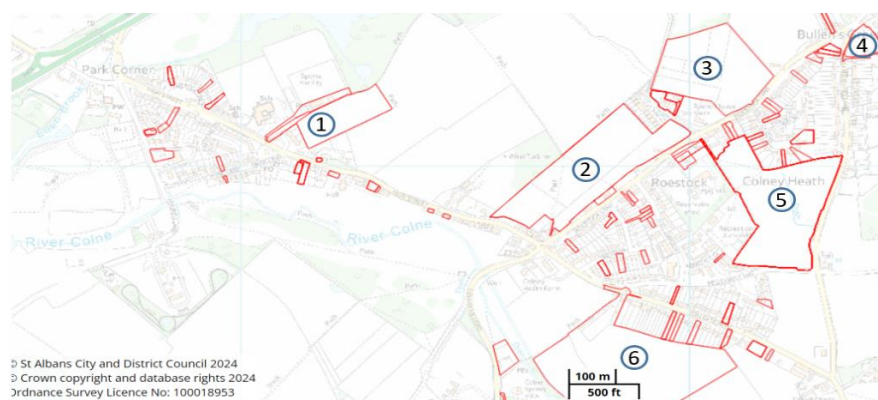
5.4.46 Beginning with **Sandridge**, the village benefits from a primary school and a good bus service to St Albans, although the B651 linking to St Albans is not an attractive cycling route. This is low lying land, and the Heartwood Forest could assist with containing modest expansion, but there is historic environment sensitivity, and generally no clear strategic case for directing growth to the village.

5.4.47 With regards to **Colney Heath**, there are three distinct settlement areas, Sleafshyde is located to the north, where there is a proposed allocation (a Green Belt PDL site), and further north is the Glinwells proposed allocation (also the 'East of Boissy Close' sites discussed above). The northern settlement area benefits from a primary school, whilst the eastern part has good walking and cycling links to Hatfield.

5.4.48 Colney Heath is washed over by the Green Belt but is nonetheless a key focus of planning applications ahead of the Local Plan, as can be seen from Figure 5.11. Taking the sites in turn:

- (1) Park Corner – the site here benefits from proximity to the village primary school but does not relate well to existing built form. A planning application for 45 homes here was refused in 2023 (ref [5/2022/0599](#)) and is now the focus of an ongoing appeal. The site is owned by Tarmac, who are promoting the site in conjunction with a new employment site adjacent to the A404 (ref 811). N.B. the representation also promotes another employment site to the west of London Colney.
- (2) NW Roestock – application for 155 homes is currently pending (ref [5/2022/2736](#)).
- (3) North Roestock – application 110 homes is currently pending (ref [5/2023/0405](#)).
- (4) NE Roestock – application for 9 homes was refused in 2023 (ref [5/2023/2100](#)) and is under appeal.
- (5) SE Roestock – gained permission at [appeal](#) for 100 homes in 2021 (ref [5/2020/1992](#)).
- (6) South Roestock – appeal recently dismissed for a refused 150 home scheme (ref [5/2022/1988](#)).

**Figure 5.11: Planning applications since 2020 at Colney Heath**



5.4.49 There is a clearly a need to avoid problematic piecemeal growth. Final points to note are: A) land is being promoted for employment reflecting the very good road connectivity; B) there are a number of recently permitted Gypsy and Traveller sites in the area, as discussed [here](#); C) land between Roestock and Park Corner was also promoted for housing through the consultation in 2023; C) adjacent to the west of the permitted site for 100 homes is a part PDL promoted by Affinity Water (ref 767) that warrants further consideration; and D) a small site at Roestock is being promoted for five homes and open space (ref 818).

5.4.50 In **conclusion**, it is clearly appropriate for the approach to growth at St Albans to be a **variable** across the district-wide reasonable growth scenarios (Section 5.5), but it is a challenge to pinpoint which St Albans-specific growth scenarios to progress. Concluding considerations are:

- Whilst a low growth scenario involving Green Belt release only from the two PDL sites was considered reasonable in 2023, this scenario is now judged to be unreasonable.
- This means that Glinwell should be taken forward as a ‘constant’ and, on balance, the same conclusion is also reached for North St Albans, but East St Albans should be progressed as a ‘variable’. This reflects site-specific considerations, but also merit in remaining open to lower growth at St Albans.
- With regards to the non-strategic allocations, one of the sites is constrained but the others are strongly supported. The question of whether / how to ‘vary’ non-strategic allocations is discussed in Section 5.5.
- With regards to more poorly performing options, SE St Albans warrants being explored further as a variable, as per 2023 and, on balance, the same conclusion is reached for expanded North St Albans.

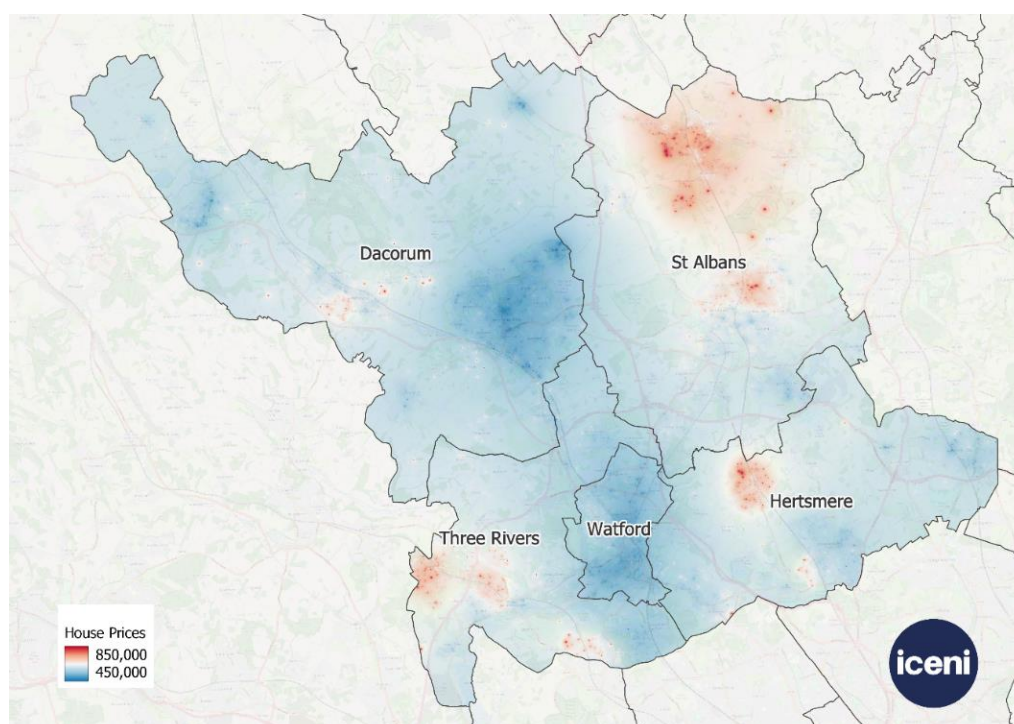
5.4.51 The above variables allow for a range of growth scenarios including higher growth scenarios that would reduce pressure on lower order settlements. Combinations of the variables are discussed in Section 5.5.

## Harpenden

5.4.52 For maps showing the sites see the [Harpenden Town](#), [Rural](#) and [Wheathampstead](#) HELAA maps.

5.4.53 As per St Albans, Harpenden’s position within the settlement hierarchy, aligned with an understanding that there are no headline reasons in support of a very low growth strategy, serves to suggest a clear need to direct a good proportion of the District’s overall growth to the town. Harpenden’s population is around 40% of the size of St Albans’, but there is a good local offer in terms of a town centre and community infrastructure, including four secondary schools. Harpenden is a notably affluent town, which serves as an argument in favour of growth, with the LHNA (2024) highlighting some very notable trends, e.g. in terms of house prices – see Figure 5.12. Also, the town is well-connected by rail with fast and frequent services to London St. Pancras and Luton Airport and St Albans via Thameslink. There is also good access to the M1, but otherwise Harpenden faces challenges in terms of road connectivity and traffic, including on account of severance created by the rail and river corridors, notably with the town centre to the west of the railway but secondary schools mainly concentrated to the east (and, in this regard, there is a need to note that students travel to school in Harpenden from both Redbourn and Wheathampstead). Also, the town is not as well-connected to the strategic road network as is the case for other nearby towns. The Hertfordshire Active Travel Strategy (2023) highlights a concentration of traffic hotspots.

**Figure 5.12:** Figure from the LHNA (2024) highlighting high house prices in Harpenden





5.4.54 When considering reasonable growth scenarios, the starting point is supply from: completions and commitments (344 homes, or 9% of the District total, which is somewhat low as a percentage of dwelling stock), windfall (329 homes, or 16%) and proposed urban supply (202 homes, or 22%).

5.4.55 These sources of **non-Green Belt** supply total 875 homes.

5.4.56 In turn, there is a clear strategic case for exploring Green Belt release at Harpenden. This is in the context of the stretching LHN figure and accounting for non-Green Belt supply elsewhere, supply from HGC and supply from Green Belt at St Albans, as discussed above. The Draft Local Plan (2018) proposed Green Belt allocations for a total of 1,561 homes, and whilst there were some concerns raised including from a transport perspective (i.e. the west/east transport issue relating to topography and the railway), it is difficult to envisage any reasonable growth scenario involving nil Green Belt release at Harpenden (also recalling the general context of the plan needing to progress in line with the committed timetable).

5.4.57 **Green Belt options** can be placed into a *broad* sequential order of preference:

5.4.58 A starting point is **NW Harpenden** strategic urban extension, which is both recommended by the Green Belt Review *and* proposed for a strategic scale scheme (293 homes) with the potential for infrastructure benefits. There is an assumption that community facilities to the benefit of the existing and future residents would be provided, including facilities that may enhance the offer of the existing nearby local centre, as well as extensive greenspace and improved cycling connections to the town centre.

5.4.59 Second, there is a need to consider **non-strategic sites** recommended by the GB Review.

5.4.60 The Draft Plan (2023) allocated 14 sites for a total of 670 homes; however:

- four are now no longer being taken forward for quite clear-cut reasons, with two of the sites unavailable (Rothamsted Research and Piggotshall Lane STW);
- one is likely to fall within the revised boundary of the Chilterns NL (Beesonend Lane);<sup>12</sup> and
- one is judged clearly unsuitable in road access terms (Cross Lane).<sup>13</sup>

5.4.61 Taking the remaining ten sites in turn:

- Townsend Lane (65 homes) – is at the western extent of Harpenden, ~1km from the town centre and near adjacent to a secondary school, plus the Nickey Line cycle route is adjacent (particularly good for accessing Redbourn and Hemel, whilst trips to Harpenden would likely be via road). The site is in the control of a housebuilder, such that it can likely deliver early, and the consultation response received in 2023 (ref 800) covers a range of issues. However, the site intersects the Chilterns Beechwoods SAC zone of influence, and the response is not clear on SAMM/SANG contributions.
- Falconers Field, Harpenden (39 homes) – also at the western edge of the town, within the SAC zone of influence. In combination traffic impacts with NW Harpenden is a consideration. The consultation response received in 2023 (ref 818) presents two layout options, including an option for 30 homes.
- North of Wheathampstead Road (38 homes) – there is a pending planning application for 40 homes (ref [5/2022/2748](#)), which is discussed in the consultation response received in 2023 (ref 891). The site is relatively well-located and contained, but there are some heritage and biodiversity constraints.
- Piggotshall Lane (29 homes) – an application for six homes was refused in 2023 (ref [5/2022/2616](#); also see consultation response ref. 890). Access is a challenge, as this is a narrow lane used as a route to access schools (e.g. students from North of Wheathampstead Road would likely use this route).
- Lower Luton Road (25 homes) – located at the eastern edge of Harpenden, and in close proximity to a secondary school. There is a need to consider planning comprehensively for this broad area.
- Rothamsted Lodge, Hatching Green (25 homes) – located in a conservation area, but concerns are reduced on account of an adjacent committed scheme for five bungalows (ref [5/2022/1814](#)).

<sup>12</sup> Another issue flagged by the ISA Report in 2023 was access via a narrow lane with a clear historic character, mindful of the adjacent Childwickbury Conservation Area. The site is also constrained in wider transport terms, given a ~3km walking distance to the town centre. The site promoter rep (ref 41) proposed 58 homes, a 66 bed care home and a community hub.

<sup>13</sup> Cross Lane was proposed for 95 homes, but had previously been considered for 131 homes, and is the subject of a planning application for 31 homes (ref [5/2023/0317](#); also see <https://lansdownland.co.uk/cross-lane-fields>). There are access and transport issues including noting adjacent common land that is also designated as a conservation area.

- Wood End, Hatching Green (14 homes) – also has a degree of heritage sensitivity, but Hatching Green benefits from relatively good proximity to the town centre and train station.
  - Baulk Close (8 homes) – an application for affordable housing was recently withdrawn (ref [5/2023/1071](#)).
- 5.4.62 Third, is **NE Harpenden** strategic urban extension, which comprises: A) a main parcel not recommended by the GB Review; and B) a smaller southeastern parcel that *is* recommended.
- 5.4.63 There are clear Green Belt sensitivities, including given a weak northern boundary (although the river valley topography assists in this regard, and the proposal is to deliver open space on higher ground), plus the site is ~2km from the town centre and train station and traffic along the Lower Luton Road is an issue.
- 5.4.64 Also, an issue is that the site is being promoted as three separate sites (also, there is another adjacent site to the south being promoted for 23 homes, as discussed further below, and where there is a current pending application; ref [5/2023/2611](#)). However, there is confidence in the ability of the promoters to work in collaboration (the consultation response references are 819, 841 and 856), with the central site (see the red line boundary in Figure 5.11) delivering the great bulk of non-residential uses and greenspace.
- 5.4.65 Access is another issue, with Figure 5.13 suggesting the possibility of a very long cul-de-sac. However, a link road that connects all the way through the site could be another possibility if the site is planned in conjunction with the aforementioned adjacent site to the south (where there is a planning application for 23 homes). Another possibility is upgrading Common Lane, which is proposed by the promoter of the southern parcel of land. Biodiversity is a potential constraint in this eastern part of the site.
- 5.4.66 It is also recognised that traffic along the Lower Luton Road is a concern, including in light of potential [expansion](#) of Luton Airport, plus there is a network of narrow rural lanes to the east of the site.
- 5.4.67 Despite the challenges, a clear benefit is proximity to a recently delivered secondary school (Katherine Warrington school) and the scheme would deliver a new neighbourhood centre and a primary school. The ability to walk to schools from the new community is seen as a key benefit to the site, including in light of consultation responses received regarding transport challenges at Harpenden.
- 5.4.68 The scheme in full would deliver 738 homes, and it should also be noted that this was a proposed strategic allocation in the previous version of the St Albans Local Plan as withdrawn in 2020. There is also feasibly the option of delivering the southeastern part of the site only, where the land is recommended by the Green Belt Review, and this option was explored in detail in 2023 and promoted through the consultation.

**Figure 5.13: Central site promoter vision for NE Harpenden (2023)**



5.4.69 **Other options** for strategic urban extensions perform less well, and so can be ruled out with relative ease, given sequentially preferable sites (as listed above) and a broad understanding of the maximum number of homes that would be needed from Harpenden urban extensions under any reasonable scenario:

- Expanded NW Harpenden – is the subject of a current planning application [5/2023/0327](#) for 550 homes (also, the expanded scheme was a proposed allocation in the previous withdrawn St Albans Local Plan).

An expanded scheme would deliver elements of added benefit,<sup>14</sup> but would clearly lead to additional concerns from a Green Belt perspective, as the scheme would extend beyond Cooters End Lane, which is a rural lane that forms part of the Chiltern Way long-distance path, albeit an expanded scheme would deliver significant new woodland and greenspace with a view to containing development.

Transport and traffic considerations are also very significant, both in terms of trips south towards the town centre and train station (particularly given a narrow railway underpass), and trips eastwards towards the secondary schools (as discussed above). However, on the other hand, there is a transport case for directing growth to the Luton Road corridor (A1081) over the Lower Luton Road corridor (B653).

- Aldwickbury Park Golf Club – is then the only other strategic urban extension being actively promoted (N.B. it is adjacent to two of the non-strategic sites discussed above). The land benefits from relative proximity to the town centre and train station, and Wheathampstead Road appears to be a fairly wide road corridor (albeit a minor road). However, existing trees and woodlands onsite (linked to past landscaped gardens/parkland) are a constraint, as is the topography in the northern part of the site. With regards to Green Belt sensitivity, whilst the site is not ‘recommended’ by the GB Review, there would be some potential to utilise landscape features for containment, and the possibility of a modest scheme with extensive accessible greenspace (the golf course is not publicly accessible) might be explored. Also, the ISA Report (2023) mentioned the possibility of relocating the adjacent Sewage Treatment Works to a more peripheral location. However, the consultation response received in 2023 presents no information regarding what could be delivered other than proposing “600+” homes.
- Other strategic urban extension options – are very difficult to envisage. Attention potentially focuses on land between Rothamstead Park and Hatching Green, given very obvious merit in terms of relationship to the town centre and train station (also the possibility of linking to the M1 corridor via the B487). Also, there might also be some potential to draw-up topography to contain a strategic urban extension involving housing growth alongside a reconfiguration of uses, plus it is noted that there is some potential for housing growth at Hatching Green regardless (as discussed). However, land here is clearly sensitive in many respects, including in terms of Green Belt, Rothamsted Park, Grade I listed Rothamsted on high ground, a former parkland landscape, accessible parkland, accessibility via public rights of way, Hatching Green Conservation Area, and the needs of Rothamsted Research in terms of employment land and agricultural land for research (fields in use for research purposes are shown on aerial imagery).

N.B. the 2023 consultation response from Rothamsted Research presents a long term vision (ref 408).

5.4.70 **Other non-strategic options** – are inherently judged to perform poorly on the basis of not being recommended by the Green Belt Review (and on the basis of being non-strategic). Notable sites include:

- Land at Pipers Lane – is perhaps the stand-out larger omission site that is being actively promoted. It is located at the southeast extent of the town, and the proposal is for 220 homes (ref 877). However, the site does not perform well in Green Belt terms and does not stand out as particularly well located in other respects, nor is there are any clear planning gain proposals.
- Lower Luton Road – also warrants ongoing consideration, as discussed in the ISA Report (2023), specifically land in the vicinity of Katherine Warington School, the Lee Valley estate and the River Lee corridor, including HELAA site WH-35-18. However, no consultation responses were received from site promoters in 2023 (beyond that received for the proposed allocation for 25 homes, as discussed above).

5.4.71 Finally, there is a need to consider employment land, in light of the consultation response received from Rothamsted Research in 2023 setting out their long-term vision, and in light of the South West Herts Economic Study Update (2024). The new proposal is to: A) allocate greenfield land at the western extent of the campus for employment, rather than housing as was the proposal at the Draft Plan stage; and B) similarly allocate land to the south currently mainly used for parking. These proposals give rise to limited concerns, but the massing and design of buildings will need to account for historic environment constraint.

<sup>14</sup> Also see the site promoters have prepared a website: <https://landgharpenden.co.uk/>. As well as additional greenspace (including woodland, sports pitches and allotments), an expanded scheme would deliver a large retirement community.

5.4.72 In **conclusion**, it is a challenge to reach a decision at this stage regarding whether the approach to growth at Harpenden should be a constant or a variable across the reasonable growth scenarios (Section 5.5). However, on balance, the decision is reached that Harpenden can be progressed as a **constant**. This is obviously a significant departure from the approach taken in 2023 (which included testing the option of nil Green Belt release at Harpenden), but the new proposed approach is considered reasonable in light latest evidence and understanding of the strategic context (including the committed local plan timetable).

5.4.73 Key considerations are as follows:

- Both of the emerging preferred strategic urban extensions are associated with challenges, and this is particularly the case for NE Harpenden. However, there is a need to give weight to NE Harpenden's location in very close proximity to a secondary school with capacity, in light of Harpenden-wide transport challenges, and the loss of either site could well result in a problematic low growth scenario for Harpenden, because there are few if any omission sites reasonably in contention. As discussed at the start of this section, there is a clear strategic case for directing a good proportion of growth to Harpenden.
- With regards to non-strategic sites, there is support for the significant adjustments reflected in the emerging preferred approach relative to that published for consultation in 2023 (10 sites rather than 14). The Piggotthill Lane site stands out as warranting further consideration, but this is just one modest site.

## London Colney

5.4.74 For maps showing the sites see the [London Colney](#) and [Colney Heath](#) HELAA maps.

5.4.75 London Colney is a third-tier settlement (classed as a small town). There is some employment provision and high order services including retail and leisure, but there is currently no secondary school. There is relative proximity to employment locations, including via the M25, but the nearest train station is at Radlett.

5.4.76 The planning context at London Colney is notably different to St Albans and Harpenden. The latter are historic market towns that have expanded organically in a fairly typical fashion, whilst London Colney was historically a modest village associated with the River Colne, prior to extensive (in relative terms) 20<sup>th</sup> century expansion, including early 20<sup>th</sup> Century expansion associated with the former Napsbury hospital.

5.4.77 Options for expansion are limited by clear constraints, namely: Napsbury Park/Hospital Conservation Area and Registered Park and Garden (Grade II) to the west, as well as the site of the Government permitted SRFI (along with associated new country parks); the A414 (North Orbital) to the north, as well as the Green Belt gap to St Albans; the A1081 (London Colney Bypass) to the east; and the River Colne to the south, as well as the M25.

5.4.78 In this light, there is a case for considering low growth at London Colney, potentially to involve nil growth over-and-above completions and commitments (156 homes, or 4% of the District total); windfall (63 homes); and proposed urban supply urban supply (67 homes, which includes one greenfield site, as discussed further below). In total, this **non-Green Belt** supply is 286 homes.

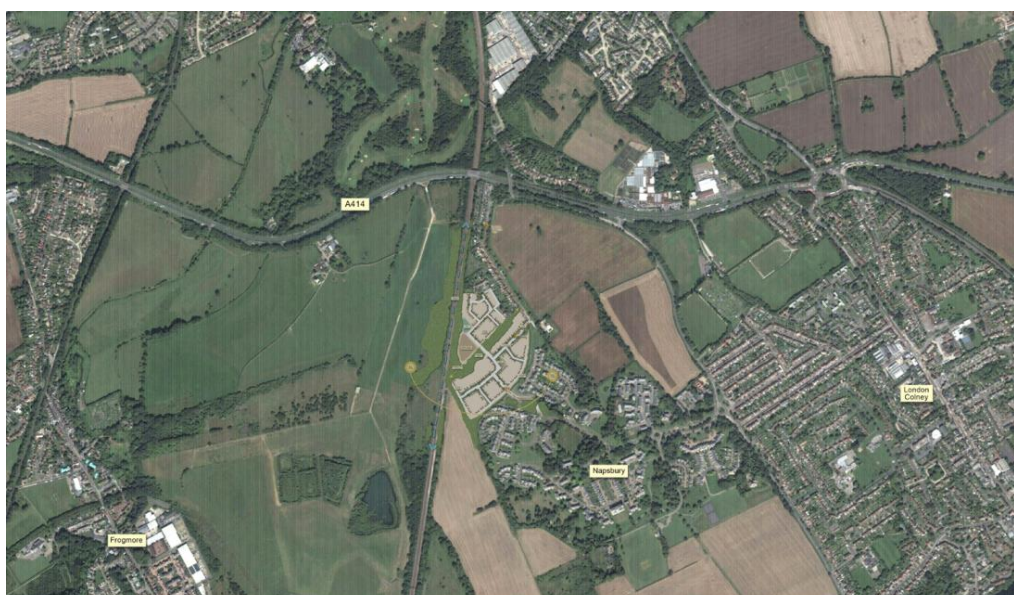
5.4.79 With regards to **Green Belt** options, the first point to make is that the Green Belt Review does not recommend that further consideration is given to the release of any land parcels around London Colney. On this basis, there is a clear argument for exploring a growth scenario involving no Green Belt release.

5.4.80 However, there is also a clear strategic argument for exploring Green Belt release, namely allocation of the **West London Colney** strategic site that featured in Draft Local Plan (2023). That site was found to perform broadly well through the appraisal, and also generated relatively strong support through consultation. This particularly reflects the fact that the site is in public sector ownership and, in turn, is able to deliver a new secondary school alongside a very modest number of homes. Furthermore, there is a strong strategic case for a new secondary school in this location, and there was caveated support for the strategic allocation set out within a consultation response prepared jointly by a total of 15 London Colney councillors, namely County Councillors (1), District Councillors (6) and Parish Councillors (8). It is also notable that the site was a proposed strategic allocation in the previous version of the Local Plan.

5.4.81 With regards to the detail of the scheme, the County Council's consultation response (ref 313) includes a concept masterplan that is unchanged since 2018 and suggests that the capacity might be increased from 405 homes to 450 homes. Also, in a separate response, the County Council sets out that the previously proposed primary school at the site is not supported, because a better solution would be to expand existing schools. There are also a range of other ongoing considerations, but overall the site is strongly supported.

- 5.4.82 Beyond this it is difficult to identify further options that might reasonably be taken forward to Section 5.5.
- 5.4.83 The fields adjacent to the **north of the town** – are not HELAA sites and are seemingly in use as playing fields, whilst land northwest of the town, to the west of Shenley Lane, falls within the Napsbury Hospital Registered Park and Garden. Land to the northwest of Napsbury Park, comprising the northwest extent of the Registered Park and Garden, is being promoted for development (specifically a main site for ~200 homes plus a much smaller site at the very northwest extent); however, in addition to historic environment and wider constraints (N.B. a range of information is submitted by the site promoter; see consultation ref 120), the land is not well-connected to London Colney. It is also simply the case that the land is not recommended by the Green Belt review and there is no potential to deliver a strategic scheme that would deliver benefits that serve to outweigh the constraint. The potential for growth in this area to result in future pressure for growth on the wider landscape parcel to the east can be envisaged.
- 5.4.84 Land to the **south of the town** – is constrained by flood risk and then, beyond the flood risk zone, land comprises former landfill and is set to deliver a country park alongside the Government-permitted SRFI.

**Figure 5.14:** Site promoter vision (2023) for land north of Napsbury Park



### Napsbury Park Infill Extension

Master Plan Concept Document September 2017

Countrywide

- 5.4.85 The final option is then **land to the northeast**, beyond the A1081 dual carriageway, where the option of a strategic-scale scheme was closely considered through the appraisal of growth scenarios (specifically, see Scenario 3) within the Interim SA Report (2023). In particular, there was considered to be merit in testing the option of growth here in combination with a SE St Albans strategic urban extension, including as the two combined schemes might support strategic transport upgrades (e.g. to include a new A414 junction) and potentially long-term aspirations for upgrading the A414 as a public transport corridor.
- 5.4.86 However, there are clear issues with delivering a strategic scale scheme in this location, given two dual carriageways and a large ancient woodland, and the option of growth here was not shown to perform well through the appraisal in a number of key respects. Also, there is a degree of landscape sensitivity, with the ISA Report (2023) explaining that the southern part of the site is associated with long distance views over the River Colne valley". Furthermore, the land is not being actively promoted, i.e. the land-owner did not submit a consultation response in 2023 (indeed, no consultation responses are thought to have referred to the option of growth here, as tested through the SA).
- 5.4.87 A final consideration is that the land is in the ownership of the landowner currently promoting the Bowmans Cross new settlement through the Hertsmere Local Plan. The new settlement is a preferred option within the Hertsmere Local Plan at the current time, and the latest proposal is to contain the new settlement to the south of Coursers Road, such that there is no reason to suggest a coordinated scheme that also takes in the land currently in question within St Albans District (i.e. land to the northeast of London Colney) and seeks to maximise infrastructure benefits (e.g. mitigating concerns about traffic from Bowmans Cross, and pressure on community infrastructure).

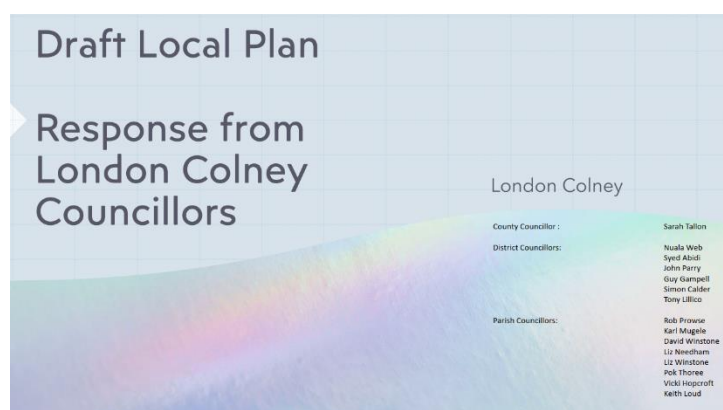
- 5.4.88 In any case, a coordinated scheme would mean extending either side of the River Colne corridor (including Bowmans Lakes), which would give rise to clear challenges (albeit feasibly also opportunities, for example in terms of strategic flood water attention and/or access, including noting that the lakes complex here is currently used for angling, such that there is presumably limited accessibility, although there is a high density of public rights of way).
- 5.4.89 In summary, whilst this option was closely considered in 2023, it can now be ruled out.
- 5.4.90 A final consideration is two urban greenfield allocations from 2023, both of which are shown in Figure 5.15. However, the eastern site is now removed from the plan, including due to availability issues.
- 5.4.91 In **conclusion**, at the current time, in light of strategic factors (Section 5.2) and settlement / site-specific factors (as discussed above), it is reasonable to hold the approach to growth at London Colney constant across the RA growth scenarios, such that attention can focus on other settlements as the key variables.
- 5.4.92 Finally, Box 5.4 summarises the consultation response received from London Colney Councillors.

**Box 5.4: Summary of consultation response received from London Colney Councillors**

As discussed, through the consultation in 2023 a response was jointly submitted by County, District and Parish Councillors from London Colney. The following bullet points respond to the concluding points of the response.

- *“Local councillors accept the need for sustainable development in London Colney and accept the number of houses proposed as reasonable.”* Noted. The quantum of growth directed to London Colney is somewhat low given its place in the settlement hierarchy, and in comparison to Redbourn, but this is a reflection of London Colney and site-specific issues (not least the lack of any land ‘recommended’ by the Green Belt Review). As such, there is a need to continue to proactively explore options for housing growth at LC.
- *“Biggest concern is that the plan lacks a strategy for business and more work is required to refine the plan based on an ambition to encourage significant growth in high value employment in London Colney and the surrounding areas. This may include careful consideration of the Riverside Industrial Estate and the site north of the A414.”* Noted. There is a recent permission for employment uses on a large part of Riverside Industrial Estate (ref [5/2022/2966](#)) and there is a strategic case for protecting / enhancing the whole estate.
- *“Though not ideal, the team accept the broad location west of London Colney but many concerns exist that must be addressed... A secondary school in the village is welcomed but its size needs careful consideration, an 8-FE school may draw too much traffic into the village.”* Noted (also six detailed concerns raised).
- *“Any development on Harper Lane needs to address the issue of the bridge over the railway and junction with Watling Street.”* – Noted and see discussion below under the Radlett heading.
- *“Careful consideration of cost v benefits of proposed development sites around Morris Playing fields is needed. As part of a wider view including the Riverside Industrial Estate.”* Noted. The eastern site is now deleted, and the western site is discussed in Section 9. With regards to the industrial estate, we note the suggestion that it might be considered for redevelopment, to deliver both new homes and greenspace, and because of its locational challenges. However, the industrial estate is considered to perform an important strategic role. The following suggestion regarding green infrastructure is also noted: *“There is a consensus that a more strategic approach is needed to the entire area between White Horse Lane and the River Colne.”*

Finally, it is noted that the Councillors oppose the Government permitted SRFI to the west of London Colney and also the Bowmans Cross new settlement to the southeast (within Hertsmere District) – see Figure 5.16.



**Figure 5.15:** Image submitted by local councillors showing the two proposed greenfield allocations from 2023; N.B. the eastern site is no longer proposed for allocation; also note that the industrial land is now coming back into use



**Figure 5.16:** Image submitted by local councillors showing London Colney in the wider context



## Redbourn

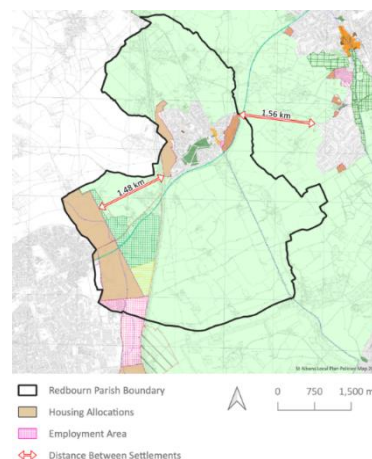
- 5.4.93 For a map showing the sites see the [Redbourn Parish](#) HELAA map.
- 5.4.94 Redbourn is a fourth-tier settlement (classed as a large village), alongside Wheathampstead (discussed below). There is a village centre with a range of retail and community infrastructure including a GP surgery, and there is a leisure centre at the northern extent of the village.
- 5.4.95 However, there is no secondary school and only one primary school. There is also no train station and limited employment, although Redbourn benefits from proximity to higher order settlements. It has limited but reasonable bus connectivity for a village of its size (summarised in the Parish Council's consultation response; ref 770), plus an off-road cycle route to Hemel Hempstead and Harpenden (the Nickey Line).

- 5.4.96 There is a fairly strong linear historic core along the high street, with valued common land to the west (linking to the Grade I listed parish church) and the River Ver corridor to the east of the village centre. Redbourn saw quite extensive expansion in the latter 20<sup>th</sup> century, particularly to the north, with housing bringing with it new community infrastructure. Also, Redbourn intersects the 12.6 km zone of influence surrounding the Ashridge Woods and Common component of the Chilterns Beechwoods SAC, such that there is a need for new homes to come forward alongside both SANG and contributions to SAMM.
- 5.4.97 When considering reasonable growth scenarios, the starting point is supply from: completions and commitments (41 homes, or 1% of the District total;<sup>15</sup> windfall (43 homes); and proposed urban supply (5 homes). In total **non-Green Belt** supply is 89 homes.
- 5.4.98 With regards to **Green Belt** options, the first point to make is that there is a strategic case for Green Belt release at Redbourn, in light of the appraisal of growth scenarios and the consultation held in 2023.
- 5.4.99 However, it is also recognised that there is feasibly the possibility of not supporting Green Belt release at Redbourn, given the total quantum of homes that could be delivered via Green Belt release at the higher order settlements discussed above.
- 5.4.100 It is also recognised that there were some significant concerns raised by Redbourn Parish Council through the consultation in 2023 – see Box 5.5.

**Box 5.5: Commentary on the consultation response received from Redbourn Parish Council in 2023**

The consultation response raised a wide range of issues regarding the plan-making process and regarding HGC (which have been discussed above). Focusing on Redbourn-specific points within the executive summary:

- Agricultural land quality – it does appear that there is a relatively strong likelihood of ‘best and most versatile’ agricultural land surrounding Redbourn (more likely to the west), but there is no certainty in this regard, given the available evidence. This matter is explored further below, within the appraisal sections of this report.
- Redbourn Neighbourhood Plan – agree that account must be taken of what the NP sets out to achieve, which is helpfully summarised as: *“ensure any future developments is well designed and sympathetic to local character; promote high quality, sustainable eco-friendly design, that respects the environment qualities and landscape setting of the village; conserve and enhance the natural environment; improve Redbourn’s community facilities, services, and local environment and to address issues beyond the scope of the Neighbourhood Plan; protect the important local green spaces; conserve and enhance the local heritage assets; improve conditions and promote cycling and walking and better public transport facilities; and retain and strengthen the High Street.”*
- Disproportionate growth – it was recognised and acknowledged in 2023 that the proposed approach to growth at Redbourn represented a modestly high growth strategy, plus account must be taken of nearby growth at HGC, particularly that which falls within Redbourn Parish (a large proportion). This is equally recognised as a key strategic consideration at the current time, as discussed further below. However, it is important to note that London Colney, whilst a higher order settlement, has few realistic growth options, and it is equally very difficult to envisage reasonable higher growth scenarios at Harpenden.
- West Redbourn – the response refers to this strategic urban extension option as “inappropriate and unjustified by evidence” but key evidence (as of the Draft Plan consultation stage, 2023) was in the form of the Green Belt Review and work to explore growth scenarios within the ISA Report. Specific concerns relate to: impacts to historic environment assets and the historic character of the village; a risk of future “perceptual merging” with HGC (with a figure provided to highlight landscape gaps, also shown here); problematic utilities infrastructure (including major gas pipeline); and lack of information regarding development viability after having accounted for infrastructure costs (and SAC-related costs).
- East Redbourn – concerns raised relate to flood risk, the importance of the river corridor, site access and deliverability (once account is taken of development costs, including SAC-related).



<sup>15</sup> There has also been very limited housing growth over recent years, as is evident from satellite imagery going back to 2000.



5.4.101 Green Belt options can be placed into a *broad* sequential order of preference, beginning with two sites recommended for further consideration by the Green Belt Review (2023):

- **West Redbourn** strategic urban extension – is one of four proposed allocations from the Draft Plan stage where it is the case that both: A) the land is recommended for further consideration by the Green Belt Review; and B) there is the potential to deliver a strategic scale scheme. In particular, the site will deliver a primary school, which is supported by the County Council (N.B. this is an evolution of the situation since the Draft Plan stage, when there was thought to be the possibility of alternatively funding expansion of the existing primary school). Furthermore, of the four sites discussed, it is fair to say that this site is one of the stronger performing in Green Belt terms, given hard boundaries around most (but not all) of the site boundary. However, there are clear access / connectivity challenges and constraints, including in the form of the adjacent M1 and several public rights of way. Also, it is noted that there is a pending application for 300 homes within the southern half of the site (ref. [5/2021/3631](#)), which is not ideal from a perspective of comprehensive planning (and it is noted that there are three landowners in total, plus a small adjacent site to the east is being promoted by the County Council). The current planning application is for 300 homes, but total site capacity is 545 homes (down from 593 homes in 2023). It is recognised that the Parish Council request “*further granulation of West of Redbourn which does not include the whole site.*” However, supporting only half of the site would create Green Belt challenges, with a long term perspective, and delivery of a primary school could be called into question.
- **East Redbourn** – this site is also recommended by the Green Belt Review but is not a strategic site. The site benefits from good proximity to the village centre (much better than West of Redbourn) and there is a considerable opportunity to improve access to the River Ver corridor, to the benefit of the village as a whole. However, this is a complex site, particularly given the river corridor. In this light, the expectation is that the site would deliver in two parts, with the bulk of homes to the northwest of the river, and a smaller number of homes to the south. The northwest component is constrained by priority habitat at its northern extent (seemingly a remnant orchard, i.e. not riverine habitat) and road access from Crown Street could potentially be challenging, noting that the road bends quite sharply. The southeast component would benefit from very good access to the village centre and Nickey Line, but onsite priority habitat is a constraint. Across both components of the site there is a clear need for ongoing close consideration of the possible need to buffer the flood risk zone, to account for climate change.

5.4.102 Moving on to sites not recommended for further consideration by the Green Belt Review, a first port of call is a possible **NE Redbourn** strategic urban extension. This was not proposed for allocation in 2023, but was ‘noted’, and does warrant ongoing consideration. This is primarily on the basis of the site’s access and transport credentials, noting direct access onto two good road corridors (including one with bus connectivity) and good proximity to the village centre. Also, there are limited onsite constraints, although viewing the site in its wider context it seems likely that landscape is a constraint.

5.4.103 The site is being actively promoted for up to 1,000 homes plus a primary school, a care home, community and potentially employment uses, and a 22 ha SANG. Also, delivery in combination with East of Redbourn could support a comprehensive approach to river corridor enhancements, and a further consideration is that the land is owned by Lawes Agricultural Trust, which is a charity that owns the Rothamsted Estate, and which supports Rothamsted Research plus 38 third party commercial agri-tech tenant businesses that operate within the estate (as understood from the site promoters consultation response, ref 799).

5.4.104 The proposal would involve a focus of housing growth on raised land at the northern extent of the site, which might be revisited (i.e. the promoters might offer a reduced scheme without compromising on infrastructure; N.B. this possibility was equally raised in the ISA report published in 2023 but was not acknowledged in the subsequent consultation response).

5.4.105 Beyond this it is difficult to identify further options that might reasonably be taken forward to Section 5.5. Attention focuses on land to the north of Redbourn, and there is an extensive HELAA site here, but this is not being actively promoted (i.e. no consultation response was received in 2023) and this is rising / raised land that is clearly sensitive in Green Belt terms, and not very well linked to the village centre (although the leisure / recreation centre is located here, where an upgrade is under consideration, ref [5/2024/0245](#)).

5.4.106 In conclusion:

- **West Redbourn** – is a challenging site but is recommended by the Green Belt Review and is now proposed to deliver a primary school. Also, removing it would result in a low growth strategy for Redbourn, given its position in the settlement hierarchy and noting accessibility/connectivity credentials. On balance it is reasonable to hold allocation constant across the RA growth scenarios at this stage.

- East Redbourn – is considered to be quite strongly supported, albeit there is a need for further work on site capacity and development configuration. However, there is also a strategic case for ongoing scrutiny of non-strategic sites at lower order settlements, which is a matter discussed further in Section 5.5.
- NE Redbourn – has a degree of merit when viewed in isolation but can be ruled out at this stage (i.e. need not be progressed to Section 5.5) when considered in context, in that the previously proposed allocations from the Draft Plan stage – i.e. West and East Redbourn – are preferable, and there is no case for a high growth strategy at Redbourn to include allocation of all three sites. This is particularly noting the lack of a train station and secondary school (with established concerns around school traffic between Redbourn and Harpenden), the limited village centre offer, and the very limited employment offer (albeit major employment locations are within cycling distance). West Redbourn is preferable to NE Redbourn in Green Belt terms and would also deliver a more appropriate quantum of growth.

## Wheathampstead

5.4.107 For a map showing the sites see the [Wheathampstead Parish](#) HELAA map.

5.4.108 Wheathampstead is the other fourth-tier settlement (classed as a large village). It is a slightly smaller settlement than Redbourn, with a commensurately lower local offer (although there are two primary schools), and it is also a more rural settlement, with a limited bus service and without easy/safe cycle connectivity to nearby settlements. It is a relatively nucleated settlement, with a strong historic core and with 20<sup>th</sup> century expansion primarily to the south. The Wheathampstead Neighbourhood Plan explains *“our services hub contains the Parish Council office, Library, Fire Station, Police Office, Doctors Surgery, dentist and sporting facilities all located within a 150m radius.”*

5.4.109 When considering reasonable growth scenarios, the starting point is supply from: completions and commitments (45 homes, or 1% of the District total);<sup>16</sup> and windfall (21 homes). In total **non-Green Belt** supply is 66 homes (N.B. no urban supply has been identified).

5.4.110 With regards to **Green Belt** options, the first point to make is that there is a strategic argument for Green Belt release at Wheathampstead, in light of the appraisal of growth scenarios and consultation on the Draft Local Plan in 2023. Also, it is noted that the consultation response received from the Parish Council does not strongly challenge the broad approach to growth proposed by the Draft Plan, and there is support for new developments of smaller homes suited to downsizing. Quotes from the response include:

*“There has been a fair amount of development of the village within the last few years... We do not believe that it is now Wheathampstead’s ‘turn’ to accommodate new housing estates...”*

*... The Parish Council will continue to fight to protect our Green Belt however we do understand the arguments for lack of alternative development land and accept that some encroachment may be necessary for suitable development and growth of the settlement.”*

5.4.111 However, it is also recognised that there is feasibly the possibility of not supporting Green Belt release at Wheathampstead, given the total quantum of homes that could be delivered via Green Belt release at the higher order settlements discussed above.

5.4.112 With regards to Green Belt options, **five non-strategic sites** were proposed for allocation at the Draft Plan stage (2023), including one at Gustard Wood, on the basis that they comprise land parcels recommended for further consideration by the Green Belt Review. However, three of these sites can now be ruled out, because latest understanding is that they are likely to fall within the forthcoming revised boundary to the Chilterns National Landscape. The remaining two sites are as follows:

- Hill Dyke Road (85 homes) – is broadly supported by the Parish Council but is adjacent to the west of a large scheduled monument and a Local Wildlife Site (LWS). Historic England raised an objection through their consultation response in 2023, but this had now been addressed through a Heritage Impact Assessment (HIA). Access would involve some loss of a hedgerow (shown on the pre-1914 OS map), and it would be important to integrate well with the adjacent large mid-20<sup>th</sup> century housing estate.

<sup>16</sup> However, there has been housing growth over recent years and decades. The consultation response received from the Parish Council in 2023 explains: *“We note that, in addition to various small sites, major housing developments have taken place over the past 25 years. These include: the former Murphy Chemical site (Waddling Lane, Palmerston Drive, Dawes Lane and Pikes Leap) [73 dwellings], Old Waddling Lane and Abbot John Mews [11 dwellings], the former Wheathampstead Education Centre site (south of Butterfield Road) [approx. 75 dwellings], King Edward Place [24 Dwellings], Moat House [6 dwellings] and the former reed bed site (Melbourne Mews) [29 dwellings]. This totals at least 218 houses – about a 10% increase in housing stock...”*

- Amwell Top Field (60 homes) – is to the south of the village, as per the site discussed above (and mindful that this has been the main direction of village expansion over the decades). However, this is a more sensitive site in landscape and access terms, and the Parish Council raise concerns. In particular, there is some uncertainty around access arrangements, noting that Amwell Lane has a rural character and is likely to be a popular route between Wheathampstead and the historic hamlet of Amwell (where there is a designated conservation area and a pub, as well as to Nomansland Common / Heartwood Forest).

The site is clearly visible from Amwell Lane (depending on hedgerow height), and this is [raised land](#), in contrast to the majority of Wheathampstead to the north, which is associated with the valley of the River Lee. However, it is noted that the consultation response received from the land owner in 2023 (re 917) agreed with the need to deliver open space and screening, and also proposed a public right of way enhancement. There is a clear commitment to retaining the southern half of the site as open space.

- 5.4.113 With regards to the three previous allocations where there is now a strong case for deletion on National Landscape grounds, one of these is considered to stand out as also performing poorly in wider respects, namely North of The Slype, Gustard Wood. This site is not supported by the Parish Council, including as it would not be suited to deliver smaller homes, and was flagged as performing quite poorly in a number of respects through the appraisal in 2023, including in terms of accessibility (Gustard Wood comprises a post-war residential estate delivered within the former grounds of a country house and without any local services or facilities to speak of) and biodiversity (Butterfly Conservation then raised concerns through the consultation). The other two sites are small sites that are considered to perform quite strongly in wider respects, were it not for the National Landscape constraint.<sup>17</sup>
- 5.4.114 There is also one further land parcel recommended for further consideration by the Green Belt Review, located to the northeast of the village, but this land comprises sports and play facilities, and is not available.
- 5.4.115 Also, with regards to HELAA sites not intersecting a land parcel recommended by the GB Review, attention focuses on land to the **northeast** of the village, where there could feasibly be some reconfiguration of uses (noting the aforementioned sports and play facilities). However, this land was not promoted through the consultation in 2023 and is sensitive on account of the River Lee and important public rights of way.
- 5.4.116 Finally, a detailed representation (ref 801) was received from the promoter of a HELAA site located directly to the **north** of the village, adjacent to the west of the B651. However, this land is expected to fall within the revised National Landscape boundary.
- 5.4.117 In **conclusion**, one reasonable scenario clearly involves allocating Hill Dyke Road (85 homes) and Amwell Top Field (60 homes). There is an argument for ruling out lower growth, noting the Parish Council's caveated support for new homes, and given that both allocation options have been the focus of work since 2023 to understand and respond to issues/constraints. However, there is also a strategic argument for steering growth away from non-strategic sites at lower tier settlements. See discussion in Section 5.5.
- 5.4.118 With regards to higher growth scenarios, attention focuses on the two smaller sites previously proposed for allocation at the Draft Plan stage, which are now expected to fall within the revised National Landscape boundary. These sites warrant ongoing consideration, but as small sites need not be a focus of further consideration here, i.e. through the appraisal of reasonable alternative growth scenarios.

## Bricket Wood

- 5.4.119 For a map showing the sites see the [St. Stephen Parish](#) HELAA map.
- 5.4.120 Bricket Wood is located at the southern extent of the district and is a 'medium village', along with nearby Chiswell Green, How Wood and Park Street. There is good accessibility to Watford and St Albans via the Abbey Line (hourly in each direction; no current business case for an improved service) and there is very good road connectivity. There is a primary school and employment at the BRE is within walking distance.

<sup>17</sup> Beginning with Highway Chipping Depot, Lower Luton Road, this is a very small site that was proposed for 7 homes in 2023. It gives rise to few concerns on the assumption that new homes would avoid the flood zone. South of Codicote Road is then a more significant site, with the proposal in 2023 for 12 homes, although the consultation response received from the site promoter then proposed a scheme of 50 homes (ref 678). There is extensive onsite constraint, with most of the site covered by a blanket TPO and priority habitat woodland (according to the national dataset). However, some of the site is relatively open, and closer investigations may serve to identify potential to deliver a modest number of homes whilst retaining and potentially enhancing onsite trees / woodland. According to historic OS maps the site was not wooded until at least 1945, but rather was associated with the adjacent former train station / industry. However, historic satellite imagery may appear to show the site more wooded than is currently the case. An application for retirement living accommodation was recently refused (ref. [5/2023/0782](#)).

- 5.4.121 There is also low historic environment constraint, as the settlement primarily formed in the 20<sup>th</sup> Century. However, there is limited potential for growth as the village edge abuts or near-abuts strategic transport infrastructure on three sides, plus there is extensive woodland in this area, including ancient woodland ([historic mapping](#) shows an extensive area of woodland and common land).
- 5.4.122 However, the village is sensitive in biodiversity terms, including given an adjacent component of Bricket Wood Common SSSI where the condition status is 'unfavourable no change'. Forthcoming new country parks nearby could potentially help to reduce/minimise recreational pressure on the common.
- 5.4.123 When considering reasonable growth scenarios, the starting point is supply from: completions and commitments (207 homes, or 5% of the District total);<sup>18</sup> and proposed urban supply (10 homes). There is no windfall assumption, hence total **non-Green Belt** supply is 217 homes.
- 5.4.124 With regards to **Green Belt** options, the first point to make is that there is a strategic argument for Green Belt release at Bricket Wood, in light of the appraisal of growth scenarios and consultation on the Draft Local Plan in 2023. However, it is also recognised that as a lower order settlement the strategic argument is inherently limited. With regards to specific sites, the Draft Plan proposed allocation of all three of the sites recommended for further consideration by the Green Belt Review, namely:
- North of Oakwood Road (74 homes) – comprises the western part of a land parcel between the northwest edge of the village and the M25 / North Orbital (M25 J21a), with the eastern part of the land parcel having been proposed for community uses through the Draft Plan (allocation OS1) in line with the made Neighbourhood Plan. The adjacent roads are a clear constraint, plus access is a challenge, including given an area of priority habitat woodland / TPOs at the eastern edge of the site. Woodland / heathland creation could be an alternative use, but it is recognised that the landowner is agreeing to provide land for the community uses (consultation ref 59): *“The landowner will engage with all community agencies to deliver the OS1 allocation for community uses in accordance with the aspirations of the St Stephens Neighbourhood Plan and... the emerging Local Plan.”* Finally, it is noted that development will need to take appropriate account of planned upgrades to the J21a bridge as part of the SRFI works, including accounting for the aspiration for an A405 active travel route between St Albans and Watford.
  - Bucknalls Drive (44 homes) – is constrained on account of a LWS designation on three of its four sides, plus Bricket Wood Common SSSI (also open access land) is near adjacent. In this regard, Natural England's consultation response in 2023 stated: *“Should this allocation go ahead, Natural England must be consulted and mitigation measures implemented to reduce the likely impacts on Bricket Wood Common SSSI and its interest features.”* However, the site appears otherwise to be subject to limited constraint, comprising a house set within large grounds (without any clear historic environment interest).
  - Ashdale Lye Lane (14 homes) – is also constrained in biodiversity terms, although this has been accounted for in the assumed capacity (the site is 2.4 ha in size). Specifically, the great majority of the site is a LWS and TPO, and most of the remaining part is shown as priority habitat by the national dataset. However, the site benefits from excellent proximity to Bricket Wood train station.
- 5.4.125 There is limited strategic argument for examining sites over-and-above those recommended by the Green Belt Review, given Bricket Wood's position in the settlement hierarchy. However, there is a need to note:
- A large HELAA site adjacent to the village primary school that benefits from a degree of containment in landscape and Green Belt terms, although it was not promoted through the consultation in 2023.
  - Another large HELAA site not being actively promoted to the southwest of the M25/A405 junction that does not relate well to the village given the intervening dual carriageway.
  - Land to the east of the railway, where there are constraints (woodland and common land), and containment in landscape and Green Belt terms is problematic, but where there is potentially good connectivity to the train station. One site is notable for benefiting from a degree of containment, with the possibility of delivering a non-strategic scheme, namely the field adjacent to the east of Smug Oak (specifically, to the east of a small employment / commercial / community area hub) and to the south of Smug Oak Lane. A detailed representation was received (ref 601) explaining that there have been discussions with the Parish Council regarding either a 75 homes scheme involving 100% affordable housing or a 33 home scheme involving 50% affordable housing. However, there would be clear concern regarding setting a precedent for further expansion and the site is distant from the village primary school. It is also noted that Smug Oak is associated with a degree of historic character (see [historic mapping](#)).

<sup>18</sup> However, a 100 home scheme was recently delivered close to BRE. It was the first to be awarded BRE Home Quality Mark.

- 5.4.126 In **conclusion**, one reasonable scenario clearly involves allocating the same three sites previously allocated in the Draft Plan, although all of the sites are associated with issues / constraints, and there is also an in-combination consideration in respect of Bricket Wood Common SSSI.
- 5.4.127 With regards to omission sites, the two sites highlighted do warrant ongoing consideration, but there is no strategic case for looking beyond sites recommended for further consideration by the Green Belt Review (even having accounted for the possibility of a scheme comprising 100% affordable housing). The three sites previously allocated in the Draft Plan would deliver a sufficient quantum of homes for Bricket Wood, and this would be the case even if the total capacity of homes across these sites were to be reduced.
- 5.4.128 This leads to a conclusion that there is one reasonable growth scenario, i.e. Bricket Wood can be progressed to Section 5.5 as a constant. However, there is also a strategic argument around reducing supply district-wide from non-strategic allocations at lower tier settlements, as discussed in Section 5.5.

## Chiswell Green, How Wood and Park Street / Frogmore

- 5.4.129 For maps showing the sites see the [St. Stephen Parish](#) and [St. Michael Parish](#) HELAA maps.
- 5.4.130 This sub-area covers three closely linked medium-sized villages located between the southern edge of St Albans and the M25. There are three primary schools across the area, two train stations on the Abbey Line (Park Street and How Wood) and there is good road, bus and cycle connectivity to both St Albans and Watford. By way of further orientation, there is a distinction between:
- Land to the west of the Abbey Line – this is where the great majority of the built form is located.
  - Land to the east of the Abbey Line – where a small proportion of the current built form is located (although this was historically the primary area of settlement), but there is a Government permitted SRFI and associated new country parks. Specifically, the SRFI is set to be delivered to the east of Park Street / Frogmore, with new country parks to the north and south. The SRFI is also set to deliver a new bypass.
- 5.4.131 Also note that a vision document for the SRFI was submitted through the consultation in 2023 (ref 913).
- 5.4.132 Finally, by way of context, there is a need to note the following regarding recent permissions:
- Two large sites to the west were jointly granted planning permission by the Secretary of State in 2024. Specifically, directly to the west is a site for 391 homes a primary school (ref [5/2022/0927](#)) and then to the northwest is a site for 330 “discounted affordable homes for key workers” (ref [5/2021/3194](#)).
  - A smaller site for 53 homes to the north of the village was recently permitted at appeal ([5/2023/1300](#)).
- 5.4.133 The total quantum of homes is clearly highly significant for Chigwell Green. Furthermore, there are some other sites with planning permission across the sub-area, such that total supply from completions and commitments is 974 homes, or 25% of the District total. Also, there is a windfall assumption of 63 homes and four proposed urban sites for 31 homes in total. In summary, **non-Green Belt** supply is 1,068 homes.
- 5.4.134 In this context, there is limited strategic argument for additional allocation via **Green Belt** release in this sub-area. However, it is still reasonable to give consideration to site options on their merits.
- 5.4.135 With regards to specific sites, the Draft Plan proposed allocation of five non-strategic sites recommended for further consideration by the Green Belt Review. However, one of these sites is now ruled out, namely Frogmore Vicarage, Frogmore, which is a very small site that had been proposed for five homes. The issue here is primarily onsite mature trees, and the site is also adjacent to a Grade II listed church.
- 5.4.136 The remaining **four sites from 2023** are as follows:
- Burston Nurseries, North Orbital, How Wood (180 homes over-and-above the planning permission for 80 assisted living apartments and 44 bungalows) – would primarily involve previously developed land (in use as for horticulture) and How Wood local centre is nearby. However, Burston Manor (Grade 2\*) is located within the site boundary, and priority habitat is adjacent including two LWS. The area was historically associated with the Manor and extensive woodland cover that is already much reduced.
- This is a somewhat complex site, but the consultation response received from the site promoter in 2023 (ref 58) adds a degree of clarity, including by confirming that 2.9 ha of existing commercial land fronting the North Orbital will be retained and enhanced. This is potentially supported but does serve to highlight that the new homes will be somewhat isolated from existing nearby communities.

- West of Watling Street, Park Street (104 homes) – is visible from the A5183 (Watling Street) and could contribute to a perceived narrowing of the landscape gap between Park Street and St Albans but is otherwise subject to limited constraint and benefits from good transport connectivity (albeit traffic along Watling Street is an issue). A scheme for 95 homes is currently the subject of an appeal ([5/2022/0267](#)).
- East and West of Miriam Lane, Chiswell Green – is located near-adjacent to the south of the aforementioned site for 391 homes to the west of Chiswell Green that was recently granted planning permission by the Secretary of State. The site was proposed for 98 homes in 2023, but the site has now been expanded to include the Noke Hotel adjacent to the east, and the new capacity is 122 homes.

The new proposed approach is supported, in light of the following statement from the ISA Report (2023): *“[Development] could provide an opportunity to rationalise the settlement edge in this location, which is currently associated with a light industrial area, a hotel and a private road (formerly access to Butterfly World, which closed in 2015), and also mindful of the nearby Burston Nurseries site. However, the eastern half of the site comprises a blanket TPO.”*

- Tippendell Lane and Orchard Drive, How Wood (51 homes) – is well-contained in built-form terms, benefits from good accessibility to a local centre and Abbey Line stations and the proposal is to deliver a new community facility alongside new homes. However, the site appears to have not been in agricultural production for at least 20 years, and so may have biodiversity value. Also, the site comprises a historic field, such that there are historic field boundaries on all sides. Finally, it is noted that a strong surface water flood channel runs along the road at the southern edge of the site.

5.4.137 No **other sites** are supported by the GB Review. However, there are numerous other HELAA sites in this area, including a number that are being actively promoted. This is unsurprising given the nature of the built form within this sub-area (also committed built form, plus the committed SRFI and country parks).

5.4.138 However, there is a strong strategic case for ruling out any such sites, namely the quantum of growth that would be delivered by committed sites plus the four remaining proposed allocations from the Draft Plan stage (which, to reiterate, are recommended by the Green Belt Review). Notable sites include:

- Chiswell Green – a site is being promoted that comprises the majority of land between the West of Chiswell Green and Miriam Lane sites, as discussed above. The proposal is for 32 homes (ref 882).

Also, the former Butterfly World site is being promoted for 125 homes (ref 855), but the site must be considered in the context of the two adjacent sites recently permitted by the Secretary of State (including the new proposed primary school). Looking more broadly to the west of Chiswell Green, other land is available, and a case can be made for comprehensive long term planning for growth in this area.

Finally, at Chiswell Green, there is a need to note the parcel of land directly to the north of the village, to the west of Watford Road and surrounding the aforementioned site recently granted permission at appeal for 53 homes. The land has not been promoted as available and appears to be used for rough grazing (potential biodiversity value), but satellite imagery dating from 2005 shows that it was most under arable cultivation at that time. A footpath connecting to St Albans is another consideration of note.

- How Wood – firstly, there is a need to ensure a comprehensive approach to growth in the vicinity of Burston Nurseries, accounting for woodland sensitivities and with a view to linking the new proposed development at Burston Nurseries to How Wood as effectively as possible. In this regard, it is noted that a consultation response was received in 2023 promoting a parcel of land adjacent to the south of the Burston Nurseries site (ref 1068), with the proposal being for a combined scheme. Also, in a separate consultation response (ref 893) the western extent of this area is proposed for housing, and there is an application here for 190 homes ([5/2023/0983](#)) that has a resolution to grant permission.

Secondly, there are omission sites being promoted at the northern extent (ref 797) and southern extent (ref 908) of the village. However, the former site would coalesce (or contribute to coalesce between) How Wood and Park Street, whilst the latter is constrained by the M25 at its southern extent and priority habitat at its northern extent (with Blackgreen Wood ancient woodland adjacent to the west).

Thirdly, two consultation responses were received in 2023 promoting land to the southwest of Lye Lane and northwest of M25 J21a. In the centre of this area is a former stately home and a care home, and land to the east was formerly parkland / gardens. Land to the west is heavily degraded and contaminated following extensive fly tipping. Also, this parcel of land is not well-related to How Wood or well-connected in transport terms, albeit the situation could improve following development at Burston Nurseries.

- Park Street / Frogmore – there are no significant omission sites of note in this area.

5.4.139 In **conclusion**, in addition to a scenario involving allocating the remaining four sites from the Draft Plan stage, there is also a clear case for testing a lower growth scenario, in light of the sites at Chiswell Green that unexpectedly gained planning permission subsequent to the Draft Plan being prepared. It is not possible to place the four sites in an order of preference, hence there is a case for simply testing a scenario whereby none of them are allocated. See further discussion in Section 5.5.

5.4.140 With regards to omission sites, whilst none are recommended by the Green Belt review a case can be made for certain of the sites. However, in strategic terms there is a clear case to be made for restricting further growth in this area, given committed growth. See further discussion in Section 5.5.

## Edge of Radlett

5.4.141 For a map showing the sites see the [St. Stephen Parish](#) HELAA map.

5.4.142 With regards to the context to growth at Radlett, which is located within Hertsmere Borough, the Draft Hertsmere Local Plan (2024) presents a clear [discussion](#) of growth-related issues and opportunities. The settlement is described as having many of the services of a small town, but key issues include: *“Existing pressures on key services... affordable housing [including because of housing growth coming forward from small schemes]... absence of a secondary school and congestion on Watling Street.”*

5.4.143 The Draft Hertsmere Local Plan also explains that Radlett has seen low housing growth over recent years, and it is also important to note that house prices are high (see Figure 5.12, above). In this light, the previous version of the Draft Local Plan (2021) proposed 760 homes. However, the new proposal (2024) is to deliver 250 new homes in the plan period. There is no reference to the St Albans Local Plan.

5.4.144 School provision is an important consideration, with the Hertsmere Local Plan explaining:

- Secondary education - the education authority has previously indicated a need for a new secondary school to meet the needs of the Watford-Bushey-Radlett school planning area. However, it has advised that Radlett would not be a suitable location for a new secondary school due to its distance from Watford and Bushey and due to it being too small to support its own secondary school.
- Primary education – the level of housing growth previously anticipated in Radlett would have equated to a need for at least 2 forms of primary school entry... The revised number of new homes proposed will have a lower impact on primary school place demand.

5.4.145 The focus here is the option of a **northern extension of Radlett** (which is in Hertsmere Borough) into St Albans District. Land here is recommended for further consideration by the Green Belt Review and there is the potential to deliver a (modest) strategic scale scheme involving ~274 homes. The northern half of the site (adjacent to Harper Lane) comprises a light industrial area / trading estate (fully operational), and within this the northern part of the estate is a protected rail depot (important for minerals). The southern half of the site (adjacent to Radlett) then comprises greenfield land. An area of parkland / former parkland associated with Grade II listed Harper House is located to the east.

5.4.146 The site would not relate well to the edge of Radlett, and the nearest primary school would be some way distant, but Radlett Station (with a good service to London St. Pancras) would be ~ 2km distant. There is already a good footpath along Watling Street into Radlett, and there is an opportunity to enhance this as a cycle route; however, the issue is that access to Watling Street would be at the northern extent of the site (via Harper Lane), which is the part of the site most distant from Radlett.

5.4.147 A key constraint is the single carriageway railway bridge along Harper Lane, with the bridge in question located adjacent to the site and on the route to Radlett and St Albans. In this regard it is important to recognise that traffic from new homes would be to some extent balanced by reduced traffic from the industrial estate, but not entirely as there would be a need to retain the protected railway depot.

5.4.148 There is also a need to consider in-combination traffic impacts, noting the proximity of Harper Green (which has seen recent housing growth, as discussed below), London Colney (a growth location) and the proposed Bowmans Cross new settlement (within Hertsmere). A number of concerns were raised through the consultation in 2023, although it is also noted that the response received from the site promoter proposes measures to address issues (ref 852). The County Council’s response on transport does not object to development here, but concludes:

*“To be supportive of the allocation, direct high quality levels of permeability between the site and the settlement of Radlett will be needed, this would include measures such as fully lit and hard surfaced walking and cycling routes directly from the site Southwards into Radlett and through to the services and facilities... However, the railway is likely to act as a barrier to movement from this site. Provision of active travel routes and access to bus stops on Watling St are key to maximising sustainability of this site.”*

- 5.4.149 Another factor is that St Albans-bound journeys would be via the A5183, which passes through the Frogmore Conservation Area. However, the Government permitted SRFI is set to deliver a bypass.
- 5.4.150 Another promoted site would involve a **new settlement** at Harper Green, where there has been recent development (but the development remains washed over by the Green Belt). However, the site is poorly connected in transport terms, including noting sequentially preferable growth locations and the Harper Lane constraint discussed above, and it is not possible to envisage significant benefits to the nearby communities of Radlett, Shenley and/or London Colney (with the former to settlements located within Hertsmere District). Also, there would be a concern regarding maintaining a defensible landscape / Green Belt gap to Shenley (within Hertsmere). A detailed representation was received (ref 897), and it is recognised that the proposal is to deliver a primary school and extensive accessible open space.
- 5.4.151 Finally, a small mixed use development is proposed between Radlett and Park Street (Colney Street), to the south of Smug Oak Lane and adjacent to the west of an existing industrial estate (ref 804). The proposal is to deliver 185 homes for these to all be affordable homes. However, the new homes would not relate well to an existing settlement (indeed, the site would take the form of a new settlement) and there would be a need to cross the M25 and travel through Park Street in order to reach a primary school.
- 5.4.152 In **conclusion**, the proposed allocation from the Draft Plan stage warrants ongoing scrutiny, despite having clear merit in terms of: A) recommended by the Green Belt Review; B) able to deliver a (modest) strategic scale scheme; and C) including a significant element of previously developed land (albeit in employment use). However, the primary issue here is road capacity, which is a technical issue for consideration by specialists, including from a viability perspective (noting the existing use value), such that there would be relatively little to be gained from exploring the possibility of allocation as a variable across the RA growth scenarios. As such, this sub-area is progressed to Section 5.5 as a constant.

**Figure 5.17: A concept masterplan option submitted by the Harper Green new settlement promoters**





## 5.5 Reasonable growth scenarios

- 5.5.1 The final step is to **combine sub-area scenarios** into district-wide reasonable growth scenarios.
- 5.5.2 The starting point is an understanding that: A) support for **HGC** in full can reasonably be held constant; and B) the approach to growth at **St Albans** is a key variable. With regards to St Albans growth scenarios, in addition to the emerging preferred approach (a modest evolution of the proposal from 2023), there is a need to test the possibility of higher growth involving allocating one or two strategic omission sites, namely expanded North St Albans and SE St Albans (both of which were also explored through the RA growth scenarios in 2023). Also, as discussed above, it is considered reasonable to test the possibility of not allocating one of the proposed strategic allocations from 2023, namely East of St Albans.
- 5.5.3 With regards to **Harpenden** and **London Colney** the conclusion reached above is that both can be held constant across the reasonable growth scenarios, albeit this conclusion is 'on balance' for Harpenden. Similarly, for the **Edge of Radlett** the conclusion reached is that the approach to growth can be held constant, albeit the site in question requires ongoing scrutiny from a road access / capacity perspective.
- 5.5.4 The next two settlements in the settlement hierarchy are then **Redbourn** and **Wheathampstead**. At Redbourn there is a need for ongoing scrutiny of the West Redbourn strategic site, but on balance the decision is reached that it can reasonably be held constant. At Wheathampstead there are only two proposed non-strategic allocations, hence there is little in the way of a strategic argument for removing either site, but one of the sites is associated with uncertain access and a degree of constraint.
- 5.5.5 The final two sub-areas for consideration are then A) **Bricket Wood**; and B) **Chiswell Green, How Wood and Frogmore / Park Street**. With regards to (A) the emerging proposed approach involves modest growth from three non-strategic allocations, but all are associated with a degree of constraint, such that they warrant ongoing scrutiny. With regards to (B), the four emerging proposed non-strategic allocations give rise to limited concerns when viewed in isolation, but there is a need to consider the in-combination impacts of growth in the light of committed growth from sites unexpectedly gaining permission at appeal.
- 5.5.6 The key question is what aspects of the emerging proposed approach to vary across the reasonable growth scenarios in addition to the approach to growth at St Albans.
- 5.5.7 In answer to this question, it is considered reasonable to test the option of deleting all **non-strategic allocations at lower tier settlements**, i.e. at Redbourn, Wheathampstead, Bricket Wood, Chiswell Green, How Wood and Frogmore / Park Street. This reflects a desire to test the possibility of concentrating growth more at higher order settlements and at strategic sites, and it also reflects a pragmatic need to minimise the total number of growth scenarios. Also, this approach aligns with the following from HCC:
- “The county council welcomes the allocation of growth to sustainable growth locations within and adjacent to the larger and most sustainable urban centres. However, where growth allocations are proposed in settlements lower down the settlement hierarchy, their allocation should be supported by an appropriate evidence base to demonstrate sustainability.”*
- 5.5.8 The final question is whether there are any **omission sites** that warrant featuring within the reasonable growth scenarios, in addition to the two strategic omission sites at St Albans. The answer to this question, in short, is that whilst a number of omission sites are flagged as warranting ongoing consideration – for example NW Redbourn, sites expected to fall within the NL at Wheathampstead and sites adjacent to Burston Nursery, How Wood – it is not clear that any warrant featuring within the growth scenarios in light of the discussions presented above read as a whole, i.e. once having accounted for both site-specific and strategic factors. Under a scenario whereby there is a loss of a strategic site, it is fair to suggest that the first port of call would be to allocate additional strategic growth on the edge of St Albans (e.g. expanded North St Albans or SE St Albans). Equally, under a scenario whereby there is a need or a desire for higher growth, it is fair to suggest that the first port of call would be to allocate additional strategic growth on the edge of St Albans. It is recognised that calls for 'higher growth' could well be on account of concerns around the delivery trajectory at HGC (4,300 homes assumed in the plan period in the District) and, under this scenario, a further strategic urban extension allocation would make sense as the concern would be supply in the latter part of the plan period (albeit there would also be potential to boost supply through a plan review). Under a scenario whereby significant growth is lost from non-strategic sites, and it remains the case that there is a need or a desire to provide for local housing need in full, it is recognised that there would be a strong argument for making good the shortfall by allocation of non-strategic omission sites, but it is not possible to pinpoint precisely which, for the purposes of this current exercise.

5.5.9 On the basis of this discussion, the conclusion is reached that there are **8 reasonable growth scenarios**, which are presented in in Table 5.1. The table reflects the following additional two ‘rules’. Firstly, East St Albans strategic allocation would only be removed under an overall lower growth scenario. Secondly, the lowest and highest ‘feasible’ growth scenarios can be ruled out as unreasonable, i.e. it is reasonable to focus attention on scenarios that would provide for LHN or a figure modestly above or below LHN.

5.5.10 In summary, and taking the emerging preferred option (PO) as the starting point, the scenarios are:

- Lower growth by removing either East St Albans or small sites (**Scenarios 1 and 2**)
- The emerging preferred option (PO, **Scenario 3**)
- Remove small sites and replace with one or both of the St Albans omission sites (**Scenarios 4, 5, 6**).
- Higher growth by additional allocation of one of the St Albans omission sites (**Scenarios 7 and 8**).

**Table 5.2: The RA growth scenarios (with Green Belt supply broken down by sub-area)**

Supply components		1	2	3 (PO)	4	5	6	7	8		
Completions and permissions		2,176	2,176	2,176	2,176	2,176	2,176	2,176	2,176		
Windfall		2,103	2,103	2,103	2,103	2,103	2,103	2,103	2,103		
Allocations	Urban supply	960	960	960	960	960	960	960	960		
	Green Belt release	HGC	4,315	4,315	4,315	4,315	4,315	4,315	4,315	4,315	
		St Albans	Constants	1,775	1,775	1,775	1,775	1,775	1,775	1,775	1,775
			East	0	<b>472</b>	<b>472</b>	<b>472</b>	<b>472</b>	<b>472</b>	<b>472</b>	<b>472</b>
			SE	0	0	0	<b>800</b>		<b>800</b>	<b>800</b>	
			North ext.	0	0	0		<b>1,400</b>	<b>1,400</b>		<b>1,400</b>
			Harpenden	1,270	1,270	1,270	1,270	1,270	1,270	1,270	1,270
		London Colney	324	324	324	324	324	324	324	324	
		Redbourn	<b>612</b>	545	<b>612</b>	545	545	545	<b>612</b>	<b>612</b>	
		Wheathampstead	<b>145</b>	0	<b>145</b>	0	0	0	<b>145</b>	<b>145</b>	
		Bricket Wood	<b>127</b>	0	<b>127</b>	0	0	0	<b>127</b>	<b>127</b>	
		CG, HW, PS/Frogmore	<b>436</b>	0	<b>436</b>	0	0	0	<b>436</b>	<b>436</b>	
		Edge of Radlett	274	274	274	274	274	274	274	274	
<b>Total homes</b>		<b>14,517</b>	<b>14,213</b>	<b>14,989</b>	<b>15,013</b>	<b>15,613</b>	<b>16,413</b>	<b>15,789</b>	<b>16,389</b>		
<b>% above/below LHN</b>		<b>-1%</b>	<b>-3%</b>	<b>3%</b>	<b>3%</b>	<b>7%</b>	<b>12%</b>	<b>8%</b>	<b>12%</b>		
<b>Likely housing requirement</b>		<b>Below LHN</b>		<b>LHN</b>			<b>Above LHN?</b>				

#### 5.5.11 Taking each of the rows in turn:

- Completions and permissions – 2,176 homes have already been delivered since 2021 or are set to come forward at sites with planning permission (includes an 8% lapse rate).
- Windfall – it can be assumed that 2,103 homes will come forward at sites not allocated within the Local Plan but in line with policy (typically small sites within urban areas).
- Urban supply – 57 homes from Harpenden Neighbourhood Plan allocations; plus 43 homes from HELAA sites; plus 860 homes from Urban Capacity Study sites.
- Hemel Garden Communities (HGC) – 4,315 homes in St Albans District in the plan period (with further homes to 2050). Whilst HGC was a ‘variable’ across the growth scenarios in 2023, at this stage the decision is taken (on balance) to hold it ‘constant’.
- St Albans – eight Green Belt allocations are held constant across the growth scenarios, comprising two strategic sites (North St Albans and Glinwell), four non-strategic sites and two PDL sites (located close to St Albans). Also, East St Albans is an emerging proposed allocation but is explored as a variable. Finally, two omission sites – SE St Albans and ‘Expanded North St Albans’ – are explored as a variable.

In summary, therefore, five scenarios are explored for the St Albans sub-area.

- Harpenden – all ten Green Belt (GB) allocations are held constant across the growth scenarios, which includes two strategic sites (including one held constant on balance) and eight non-strategic sites. There are also two modest employment allocations.
- London Colney – one strategic GB site held constant.
- Redbourn – one strategic GB site held constant and one non-strategic variable site, such that two scenarios are explored for the Redbourn sub-area.
- Other villages – the emerging proposed approach involves a total of ten non-strategic GB allocations, but it is also appropriate to test the option of not allocating these sites, i.e. the option of a strategy more focused on strategic sites and higher tier settlements.

In summary, therefore, two scenarios are explored for each of these villages.

- Edge of Radlett – one strategic GB site held constant (on balance).
- Total homes – the emerging preferred option (PO) is Scenario 3, which involves 14,989 homes supply over the plan period, such that the Local Plan would provide for LHN (14,603 homes).

However, the housing requirement would need to be ‘stepped’, meaning it is set below LHN (885 dpa) in the early years of the plan period and then commensurately above LHN in the latter years (when strategic sites including HGC are delivering at pace).

The lowest growth scenarios would generate unmet need, whilst the highest growth scenarios would allow for: A) a generous ‘supply buffer’ as a contingency for delivery issues; and/or B) flexibility to consider a housing requirement modestly above LHN.

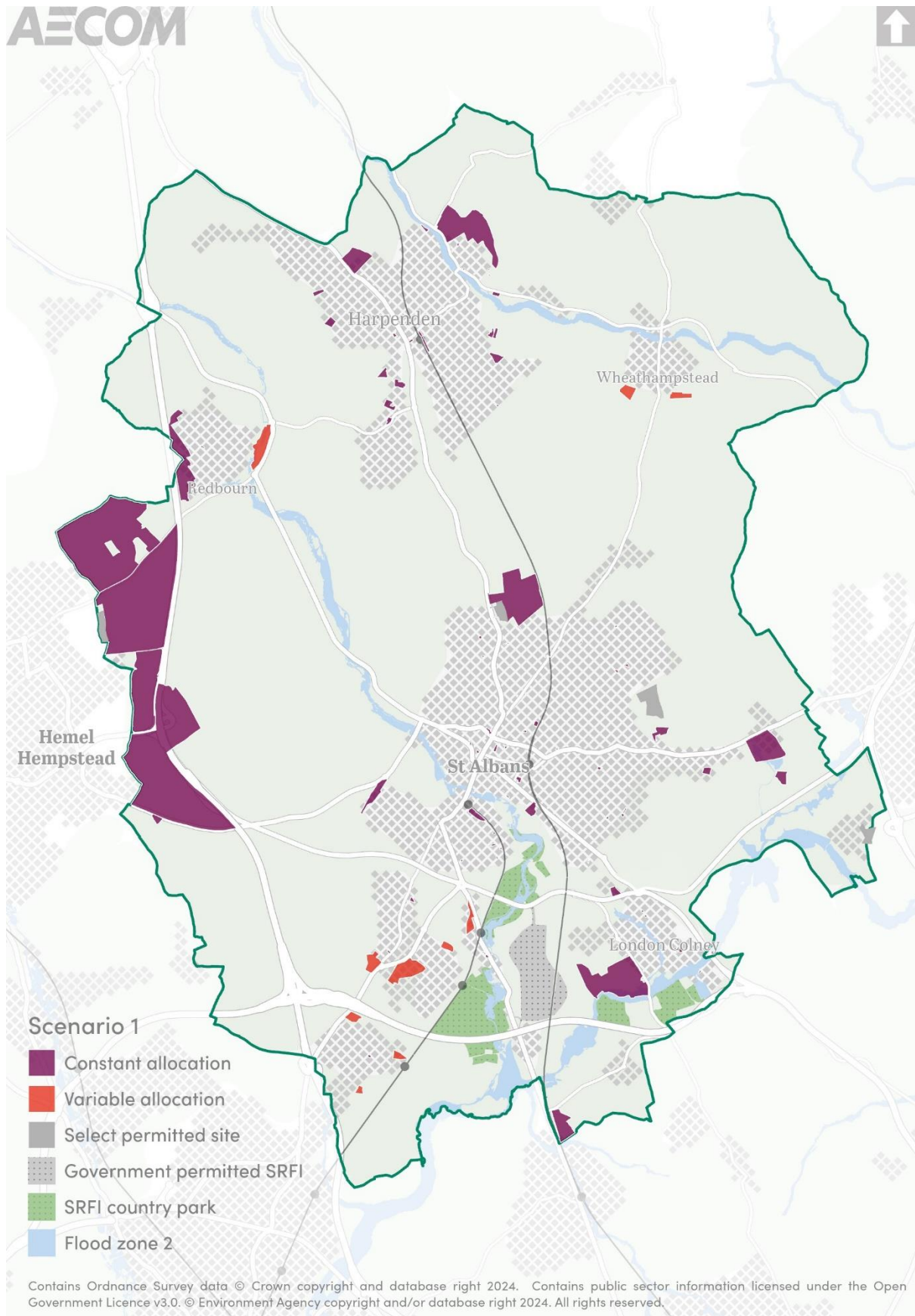
#### 5.5.12 Finally, note that whilst the growth scenarios do not vary in terms of either employment land or provision for Gypsy and Traveller pitches, an informal discussion of options is nonetheless presented in Section 6.

#### 5.5.13 The eight scenarios are considered to be an appropriate evolution of those previously defined, appraised and published for consultation in 2023. They are more tightly focused on the emerging preferred approach (i.e. vary ‘at the margins’) which is a reflection of the stage in the plan-making process / evidence. Also, it reflects the practical importance of progressing the plan in a timely manner, in that ‘going back to the drawing board’ would lead to an extended delay to the plan-making process, with major implications.

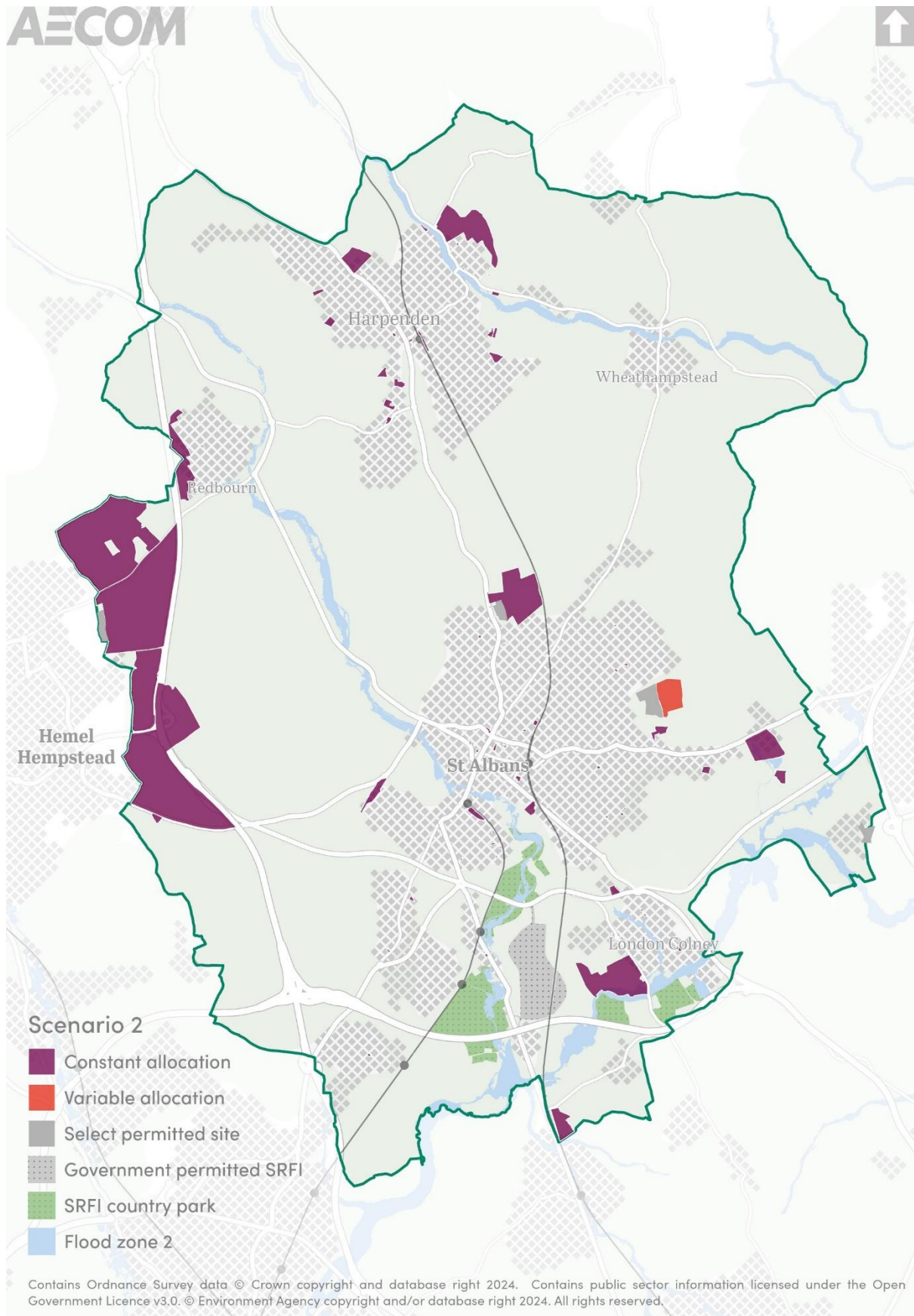
#### 5.5.14 The scenarios are also shown below across a series of maps, with points to note as follows:

- The maps do not differentiate between housing / housing-led versus employment allocations.
- Some of the allocations include land to be retained in the Green Belt (most notably HGC).
- There are other permitted sites beyond those shown, most notably west of Chiswell Green.
- There are a number of other key existing and proposed designations that have been omitted but are shown on the Local Plan Policies Map, most notably strategic greenspace, proposed locations for schools, a proposed Oaklands Sports and Community Zone and transport network improvements.

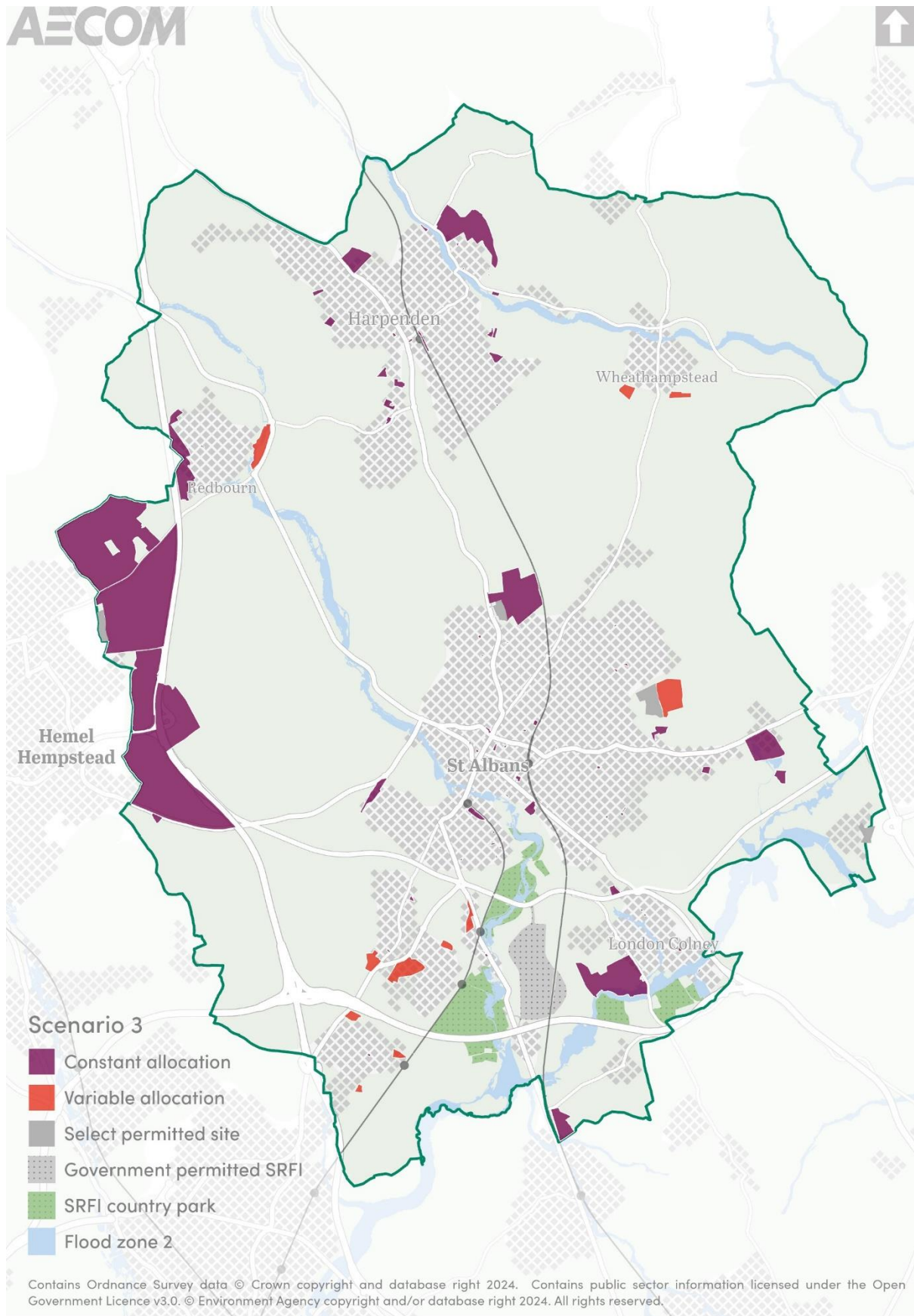
**Scenario 1: Lower growth (remove East St Albans)**



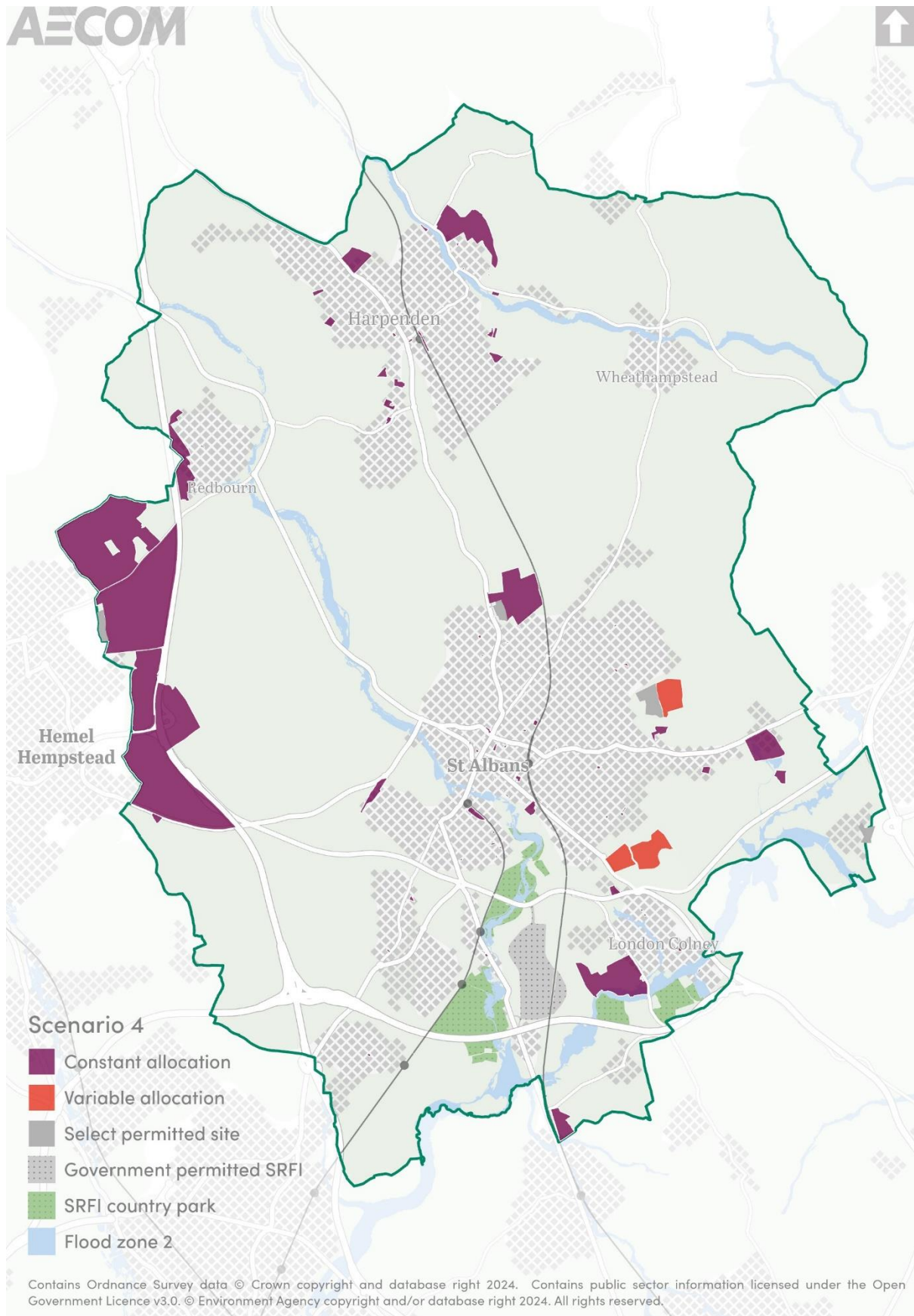
**Scenario 2: Lower growth (remove small sites)**



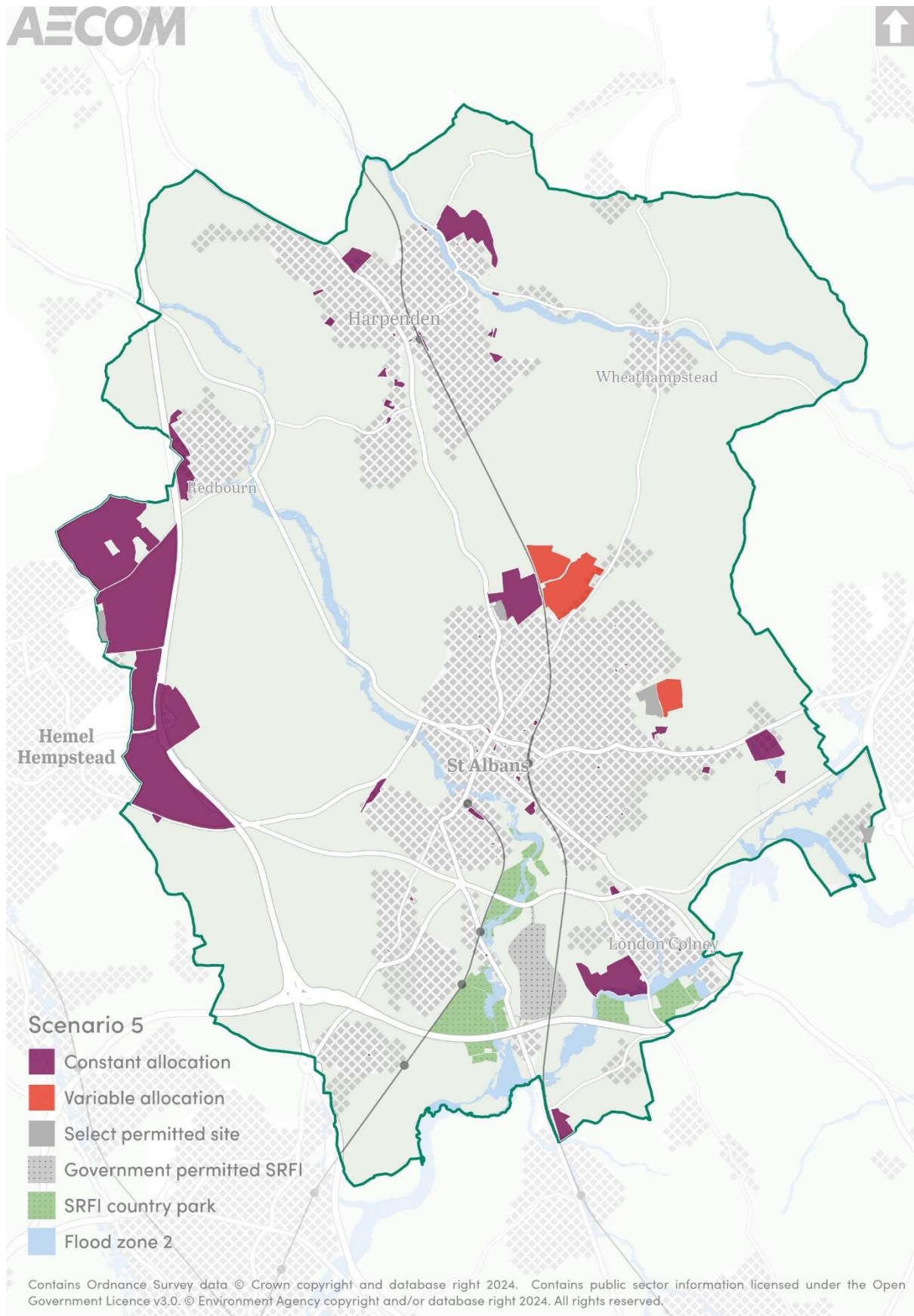
**Scenario 3: The emerging preferred option**



**Scenario 4: Higher growth (remove small sites; add SE St Albans)**

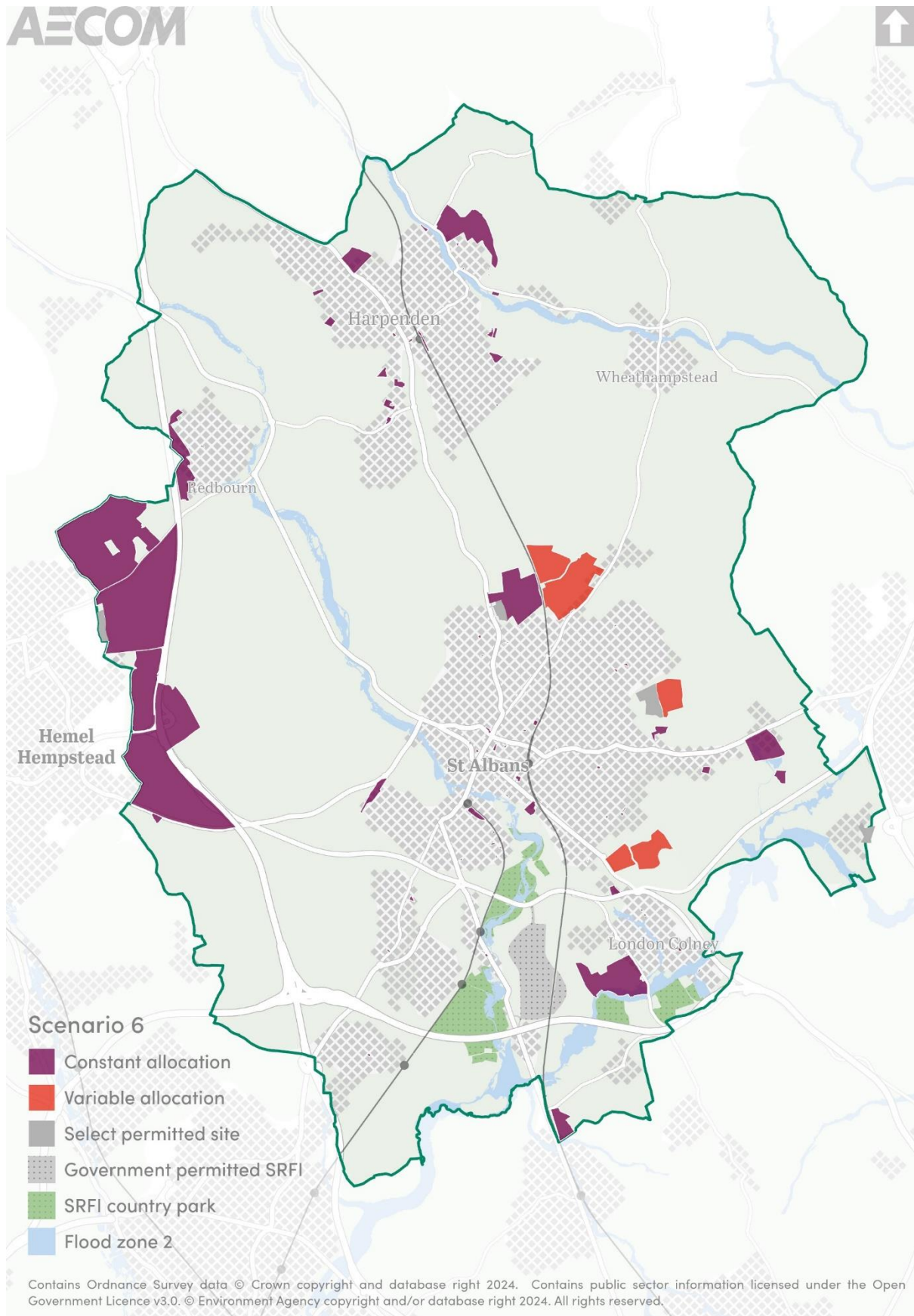


**Scenario 5: Higher growth (remove small sites; add expanded North St Albans)**

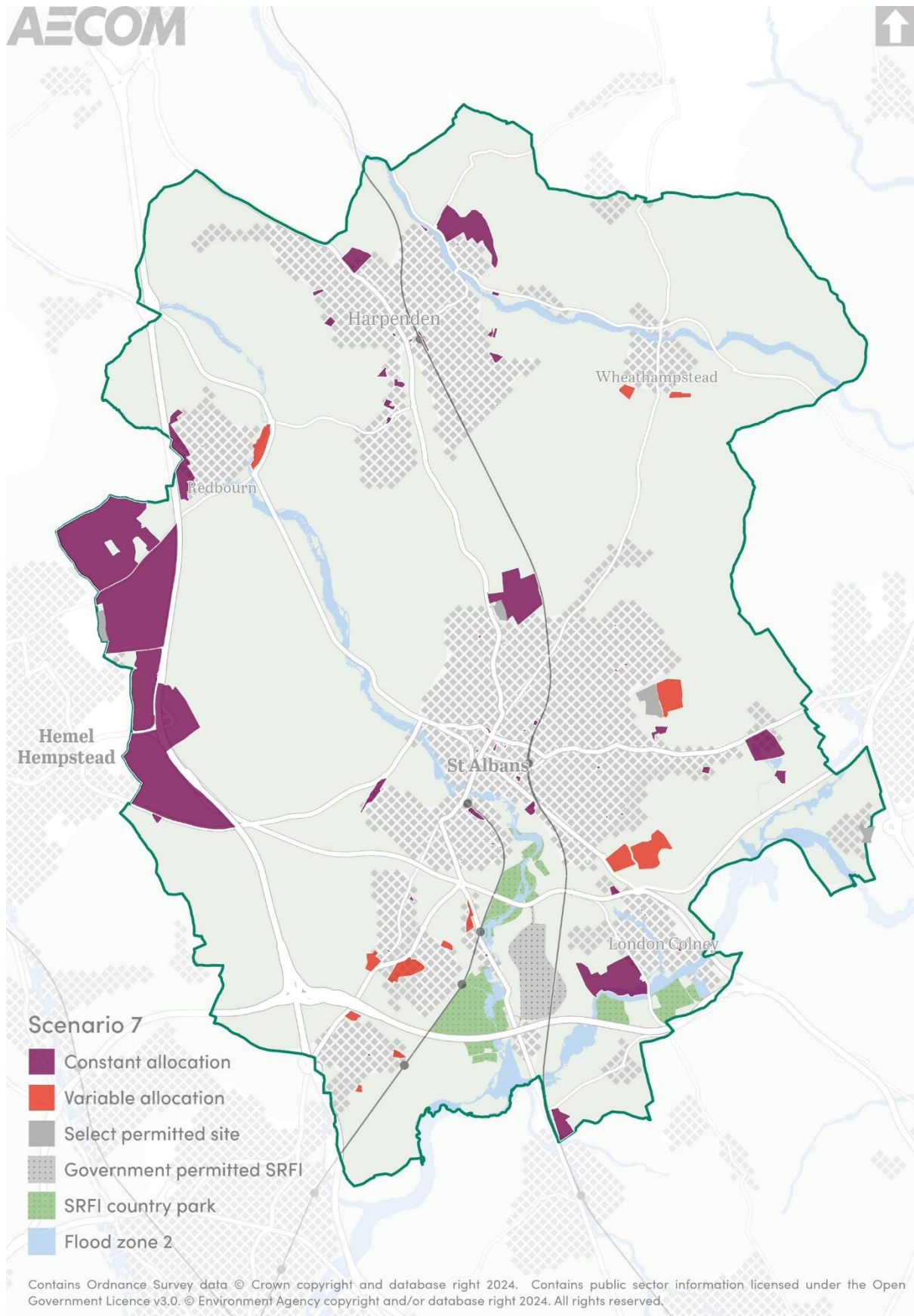




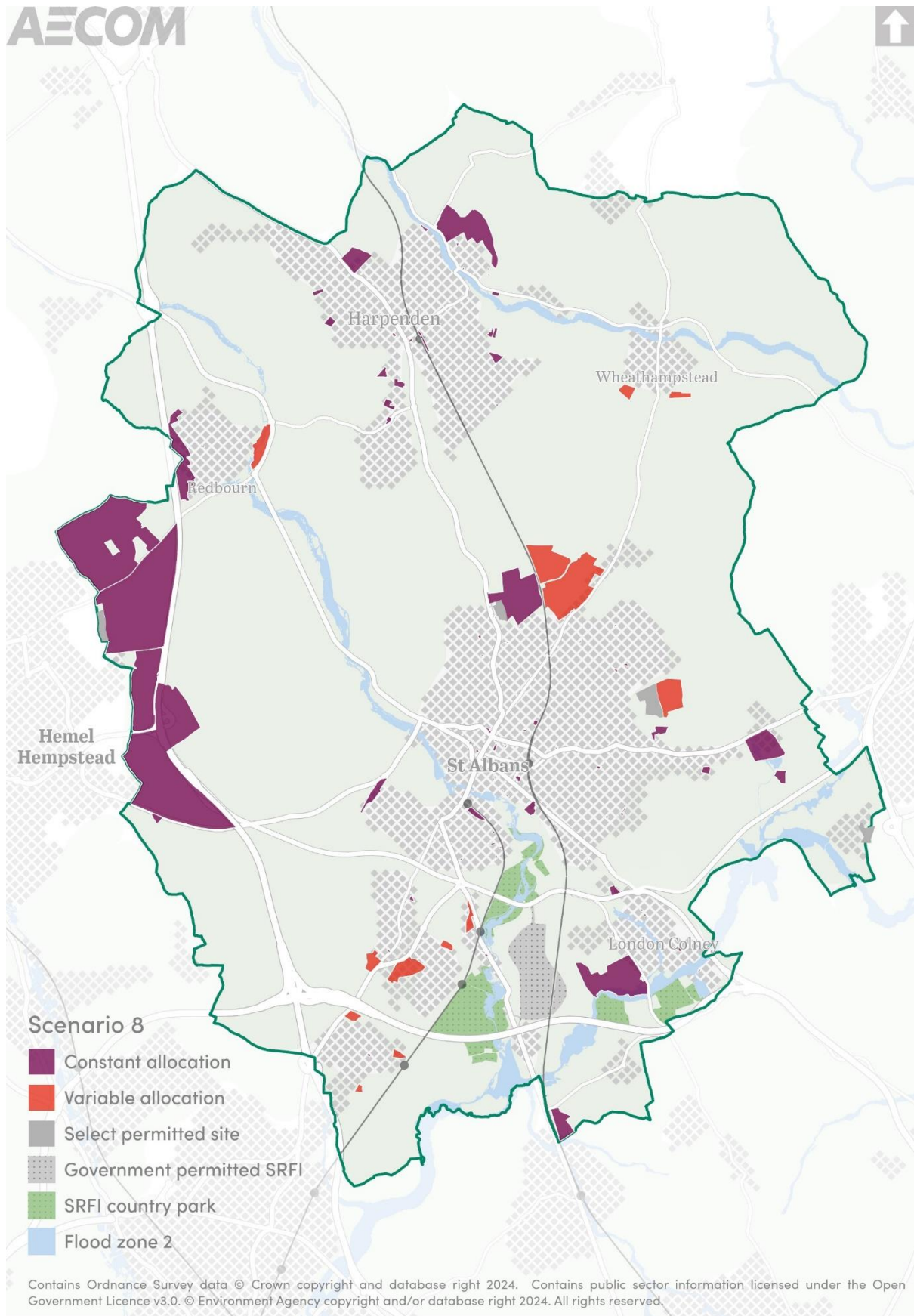
**Scenario 6: Higher growth (remove small sites; add both sites at St Albans)**



**Scenario 7: Higher growth (add SE St Albans)**



**Scenario 8: Higher growth (add expanded North St Albans)**



## 6 Growth scenarios appraisal

### 6.1 Introduction

6.1.1 Having defined reasonable alternatives in the form of eight growth scenarios, the next step is to present an appraisal under the ‘SA framework’ (see Section 3).

#### Appraisal methodology

6.1.2 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions. Under each heading, the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.<sup>19</sup>

6.1.3 Finally, it is important to be clear that there is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.

#### Recapping the growth scenarios

6.1.4 The growth scenarios are introduced above in detail, but are presented in summary below as follows:

- Scenario 1 – the preferred approach minus East SA
- Scenario 2 – the preferred approach minus small sites at lower tier settlements (“smalls”)
- Scenario 3 – the preferred approach
- Scenario 4 – the preferred approach minus small sites plus SE SA
- Scenario 5 – the preferred approach minus small sites plus expanded North SA
- Scenario 6 – the preferred approach minus small sites plus SE SA and expanded North SA
- Scenario 7 – the preferred approach plus SE SA
- Scenario 8 – the preferred approach plus expanded North SA

### 6.2 Accessibility (to community infrastructure)

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
3	★1	★1	★1	★1	2	★1	★1

6.2.1 The order of preference reflects a view that:

- Removing non-strategic Green Belt allocations from lower tier settlements gives rise to few concerns, in terms of maintaining or delivering enhancements to local community infrastructure. The primary concern would be at Bricket Wood, where removing the 74 home allocation to the northwest could call into question the adjacent large (6.5 ha) proposed allocation for community uses (in line with the St Stephen Neighbourhood Plan), which may comprise *“allotments and a landscaped parkland area... a new medical centre and/or a relocation of the Scout group... a community centre and associated outdoor sport and recreation facilities.”* Also, at Redbourn, the emerging proposed allocation to the east would deliver new strategic green/blue infrastructure and is located close to the village centre.

<sup>19</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- Additionally allocating one of the two strategic omission sites at St Albans would support delivery of new community infrastructure, and arguably boost the credentials of the overall strategy in terms of aligning strongly with the settlement hierarchy. However, it is not clear that either of the sites in question would deliver new community infrastructure to address an existing issue / realise an existing known opportunity.

Specific considerations are: A) SE St Albans could support the case for a new secondary school at East St Albans and could support long-term A414/HERT objectives (given likely strategic growth at London Colney and possibly Bowmans Cross), plus the site is quite well connected to the city centre and train station; and B) whilst expanded North St Albans would mean a scale of growth sufficient to deliver a secondary school, there is no clear need for a school here, assuming that a new school comes forward at East St Albans, and the site promoters concept plan does not propose one (see Figure 6.3, below).

- Allocating both of the strategic omission sites at St Albans would give rise to a risk of problematic high growth at St Albans. At the very least there would be a need to reconsult with the County Council in respect of planning for secondary school capacity over the plan period.
- Not allocating East St Albans could amount to a major opportunity missed in respect of delivering both a new primary school and a new secondary school, and also supporting the aspirations of Oaklands College in terms of their education, sports and wider community infrastructure offer. The secondary school is a key part of the overall benefits provided by the East St Albans strategic allocation and, at the time of writing, work indicates that the secondary school is likely to be deliverable through the allocation, however further work is still being undertaken (which is not unusual in respect of planning for secondary school capacity, given that need projections are subject to change).

6.2.2 With regards to significant effects, the best performing scenarios are considered to perform very well in absolute terms, in that new homes would be delivered in such a way that there is a strong focus on delivering new/upgraded community infrastructure alongside. It could well be that there are no major concerns under Scenario 6; however, a delay to plan-making could mean further ‘planning by appeal’ with suboptimal outcomes for infrastructure planning. Finally, Scenario 1 performs notably less well as it could well lead to an opportunity missed in respect of delivering new homes alongside a secondary school.

### 6.3 Air and wider environmental quality

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
2	1	1	1	1	2	1	1

6.3.1 The order of preference reflects a view that:

- Scenario 1 performs relatively poorly both as a lower growth scenario and because East St Albans performs reasonably well from a perspective of minimising car dependency.
  - With regards to growth quantum, there is a clear transport and, in turn, air quality argument for planning proactively in the sense of providing early certainty that housing needs will be provided for close to source. This is because: A) providing for housing need distant from source can lead to problematic commuting; and B) because partner organisations involved with transport planning require early certainty regarding the distribution of growth across the sub-region.
  - With regards to the East St Albans site itself, it is beyond easy walking distance of the city centre and train station but located near a good bus route (one of two key routes through the town), plus there are opportunities for strategic upgrades to cycling infrastructure and there would be the potential to achieve a degree of trip-internalisation, with a primary and secondary school onsite.
- Scenario 6 also performs relatively poorly because St Albans city centre is subject to a notable degree of air quality constraint, with an air quality management area (AQMA) affecting St Albans High Street.

- Removing non-strategic Green Belt allocations from lower tier settlements is arguably to be supported from a transport perspective, but there is little reason to suggest this translates into notable implications for air quality objectives, and certain of the sites perform reasonably well in transport terms, including East Redbourn and those with good access to the Abbey Line. One or two of the sites are in proximity to a major road but concerns in this regard (i.e. resulting noise and air pollution) are overall limited.
- Additionally allocating one of the two strategic omission sites at St Albans would likely not give rise to any concerns. Beginning with expanded North St Albans, this would be very challenging in terms of transport connectivity, as the site is poorly related to the strategic road network, with a likely need for primary access via the B651, which is not suited to being upgraded for cycle or bus connectivity. However, it is difficult to suggest this would translate into concerns from an air quality perspective, including noting that there would be a considerable opportunity for trip internalisation (although the train line would be a major barrier to movement). With regards to SE St Albans, this would be relatively well-located in transport terms, and a focus of growth in proximity to the A414 could well be supportive transformational change, e.g. HERT, with implications across a sub-region where air quality is an issue.
- With regards to higher growth, it is difficult to suggest an inherent concern. Looking across the sub-region (see Appendix II) it is evident that authorities closer to London are subject to higher constraint.

6.3.2 With regards to significant effects, the equivalent appraisal in 2023 concluded ‘neutral’ effects for the better performing scenarios, but it is now considered appropriate to conclude ‘moderate or uncertain positive effects’. This reflects few concerns having been raised regarding air quality though the consultation in 2023, and generally a degree of support for the proposed strategy from a transport perspective. In turn, there is a need to progress with the strategy from 2023 as far as possible, from a perspective of wishing to support effective strategic transport planning (which, in turn, is key for improving air quality).

## 6.4 Biodiversity

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
3	1	2	1	1	1	2	2

6.4.1 The order of preference reflects a view that:

- Removing non-strategic Green Belt allocations from lower tier settlements is potentially supported, as a number of the sites are subject to biodiversity constraint, most notably at Bricket Wood (see Section 5.4), but also at Redbourn (East Redbourn), where there is onsite priority habitat, plus the site falls within the Chilterns Beechwoods SAC recreational mitigation zone. Whilst there is likely to be a SANG solution for growth at Redbourn (see Section 9), there is always a need to avoid impacts as a priority.
- Both SE St Albans and expanded North St Albans are subject to limited constraint, hence there is support for their allocation (to reduce the pressure of allocation elsewhere). Taking the sites in turn:
  - SE St Albans – onsite constraints are in the form of several historic field boundaries, including along Nightingale Lane, which serves as a link between woodland patches. In particular, Winchfield Wood is adjacent to the northeast (and so adjacent to the eastern part of the site that is owned by the County Council), but the woodland appears to be quite low sensitivity, with much of it having been planted around twenty years ago (as part of [Highfield Park](#)). With regards to the western part of the site, which is in the control of a developer, the submitted concept masterplan is shown below, as Figure 6.2. Winchfield Wood can be seen at the northeast extent of the map, and Nightingale Lane defines the east of the site. There is merit in the proposal to deliver a green / blue corridor through the site, linking Winchfield Wood to woodlands in the vicinity of Birchlands Park, to the southwest.

- Expanded North St Albans – there is a constraint to the south in form of a cluster of priority habitat linear woodlands, including ‘Long Spring’, which comprises an ancient woodland LWS. However, this constraint affects land to the west of the railway line (which is a constant across the growth scenarios) more so than land to the east of the railway (i.e. the ‘extension’ option that is a current variable). Also, growth here would be in close proximity to Heartwood Forest, which is potentially a ‘positive’.

The submitted concept plan (Figure 6.3) has some merit, particularly the proposal to deliver a green corridor in the south of the site, which could link existing woodlands to the west and east quite effectively (albeit the railway is a barrier to connectivity). In the north of the site there would be a need for further work to explore options for maximising biodiversity benefits, although it is recognised that Heartwood Forest is recently planted, such that it is not necessarily the case that there should be a focus on looking to buffer and potentially expand it by further woodland creation. Having said this, the southern component of Heartwood Forest in this area is Langley Wood, which is an ancient woodland. The proposal to target woodland creation here (annotation ‘11’) is supported.

**N.B.** with regards to Figure 6.3 it is important to be clear that it shows the site promoter’s vision for a comprehensive scheme comprising land either side of the railway. This land is being considered as two separate but linked sites for current purposes, and support for the site promoter’s concept plan should not be assumed (particularly for land to the west of the railway, i.e. the constant allocation).

- Finally, Scenario 1 performs poorly as it involves removing a site subject to limited constraint, namely East St Albans. The wider sector of land between St Albans and Hatfield is associated with quite a high density of woodlands (the majority are not publicly accessible), such that there is a biodiversity case to be made for comprehensive long term planning for growth alongside strategic enhancement; however, the site in question does not appear to be associated with any particular issues or opportunities.

6.4.2 With regards to significant effects, broadly neutral effects are predicted across the scenarios, as per the equivalent conclusion reached in 2023. This conclusion is reached taking account of the numerous sites that are held constant across the growth scenarios, of which a number are subject to biodiversity constraint, as discussed further in Section 9. Also, whilst the statutory requirement to achieve a 10% biodiversity net gain as part of every planning application would apply, it is difficult to conclude that seeking to maximise biodiversity net gain opportunities has been a key driver of spatial strategy / site selection.

**Figure 6.2:** Site promoters concept plan for the western half of SE St Albans



**Figure 6.3:** Site promoters concept plan for comprehensive growth north of St Albans



## 6.5 Climate change adaptation

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
3	1	2	1	1	1	2	2

### 6.5.1 By way of introduction:

The key consideration here is the need to avoid development, and new homes in particular, encroaching on fluvial flood risk zones, noting the possibility of expanded flood risk zones and more frequent flooding under climate change scenarios. A secondary consideration is surface water flood risk, noting that it is often possible to deal effectively with surface water flood risk through masterplanning and sustainable drainage systems (SuDS). Another consideration is development impacting on water flows and, in turn, downhill or downstream flood risk; however, it is difficult to pinpoint issues ahead of detailed work, and it is typically the case that SuDS can ensure no net worsening of run-off rates, and often a betterment.

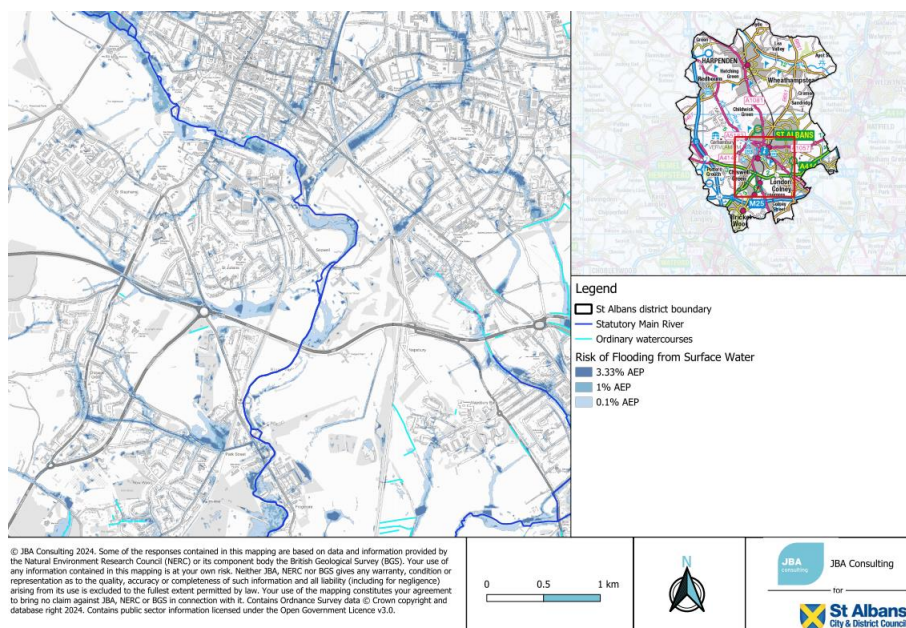
There are also wider climate change adaptation (and resilience) considerations that are of relevance to local plan-making beyond flood risk, including overheating risk, plus climate change adaptation is a reason for planning with a strong focus on biodiversity, community resilience and protecting high quality agricultural land. However, it is difficult to comment on the merits of the growth scenarios over-and-above points made more appropriately under other topic headings.



One point to note is support for larger-scale strategic sites, where it can be anticipated that there will be a degree of focus on climate change resilience/adaptation as part of master planning and design work at the planning application stage. As part of this, strategic sites will certainly tend to support effective planning for green and blue infrastructure, which is an important climate change resilience/adaptation consideration, including given links to biodiversity, flood risk and overheating risk.

- 6.5.2 Focusing on flood risk, the order of preference is as per under Biodiversity, on the basis that:
  - Certain of the variable non-strategic sites are subject to an element of flood risk, and hence there is a case to be made for preferring the scenarios that do not include these sites.
  - The other variable sites are supported because they are subject to limited flood risk.
- 6.5.3 With regards to the variable non-strategic sites, East Redbourn is the key site to flag, including with a focus on ensuring safe access and egress in the event of a flood. However, the Environment Agency has been consulted, and detailed work has been undertaken to examine the site through a Level 2 Strategic Flood Risk Assessment (SFRA). There is no reason to suggest any risk of built form intersecting the fluvial flood risk zone, including under climate change scenarios, but implications for site layout, access etc will require further detailed consideration. It will also be important to ensure a focus on Sustainable Drainage Systems, and to explore options to maintain and potentially enhance flood water attenuation capacity.
- 6.5.4 Another variable non-strategic site of note is Tippendell Lane and Orchard Drive, How Wood. Here there is a strong surface water flood channel running along the road at the southern edge of the site. However, again the site has now been examined closely by the EA and through the Level 2 SFRA, plus the site promoter submitted a concept master plan in 2023 proposing significant green and blue infrastructure.
- 6.5.5 With regards to the variable strategic sites, as discussed there are overall limited concerns in terms of flood risk. However, it is noted that expanded North St Albans is associated with rising land towards the Heartwood Forest, and that the land drains towards Sandridge. The flood channels here are defined as surface water rather than fluvial, but it does appear that the centre of Sandridge is strongly associated with surface water flood risk, hence it would be very important to masterplan any scheme for expanded North St Albans with a strong focus on green / blue infrastructure aligning with the surface water flood channels. It is not entirely clear that this is the case in respect of the work completed to date (Figure 6.3).
- 6.5.6 In contrast, from Figure 6.2 it can be seen that the green / blue corridor that runs centrally through the proposed SE St Albans concept masterplan aligns with a surface water flood channel. This is important noting that the surface water flood channel becomes a fluvial flood risk channel a short distance downstream, as it passes through the centre of London Colney (before reaching the River Colne).
- 6.5.7 Finally, with regards to significant effects, it is now considered appropriate to predict neutral effects, given consultation on detailed site-specific proposals in 2023 and subsequent Level 2 SFRA.

**Figure 6.4:** A figure from the Level 2 SFRA showing surface water flood risk at How Wood etc.



## 6.6 Climate change mitigation

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
4	3	3	2	2	1	1	1

### 6.6.1 By way of introduction:

The primary consideration here is per capita built environment emissions, given the potential to cover matters relating to transport emissions under other topic headings.

The ambition must be to deliver net zero carbon developments – see Box 6.1.

Strategic growth locations can give rise to an opportunity over-and-above smaller developments, given economies of scale and also the possibility of delivering a mix of uses onsite, which can feasibly support one or more heat networks. Strategic growth locations can also give rise to an opportunity to deliver 'smart energy systems' that link heat networks / heat pumps, solar PV, power consumers and battery storage. Also, it is simply the case that large sites will generate a high degree of attention and scrutiny, and housebuilders will often be keen to demonstrate good practice or even exemplar development.

However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because strategic sites often have to deliver costly infrastructure upgrades. Also, heat networks are technically challenging to deliver, and practice is not well advanced nationally, with a clear opportunity currently only seen to exist where there is very high density development and/or a good mix of uses (to allow heat to be shared across the course of the day) and/or a source of waste or ambient heat that can be drawn upon.

A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong viability, with a view to ensuring funding for decarbonisation measures and potentially delivering net zero development (recognising competing funding priorities).

#### **Box 6.1: Defining net zero development**

'Net zero development' is carefully defined, and there are perhaps three key points to make.

Firstly, any approach to net zero development must align with the energy hierarchy, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Achieving Passivhaus standard is an accepted approach to ensuring a suitably 'fabric first' approach to development, and the Buildings Research Establishment (BRE) also have established methods.

Secondly, there are two broad approaches to calculating net zero and evaluating proposals, namely A) the methodology applied under the Building Regulations; and B) an energy-based approach. The two approaches are compared and contrasted in a recent report [here](#) and another even more recent report [here](#).<sup>20</sup>

Thirdly, it is important to be clear that the focus of discussion above is in respect of 'operational' energy/carbon, i.e. the energy used / carbon emitted as a result of the development's occupation / use. Additionally, there is a crucial need to consider the 'whole life cycle' of a development, to include to the emissions associated with construction, maintenance, retrofitting and demolition (often referred to simply 'embodied' carbon or emissions).

<sup>20</sup> Under the Building Regulations methodology the question for any given planning application is the extent to which the development can improve on a Target Emissions Rate (TER), measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m2/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter. A high proportion of recent and emerging local plans nationally present an energy based policy. However, on 13th December 2023 a Written Ministerial Statement was released which appears to prohibit its use in local plans.

- 6.6.2 In light of these points, there is a decarbonisation argument for the higher growth scenarios. In particular, key considerations are: A) development viability is high; and B) there are generally relatively few concerns around fragmented land ownership impacting delivery and, in turn, viability, including recognising that landowners have had an opportunity to comment through the Draft Plan consultation in 2023.
- 6.6.3 None of the variable site options in question are known to be associated with a particular built environment decarbonisation opportunity, in light of consultation responses received, but points to note are as follows:
- Variable small sites – are mostly focused in the south of the District, where development viability is not as strong, but there is little reason to assume that schemes would not be able to deliver net zero carbon development to an exacting standard (Box 6.1). In terms of abnormal development costs that could impact on viability and, in turn, decarbonisation objectives, it is not possible to pinpoint any particular sites, but needing to address onsite constraints and deliver suitable access are relevant considerations.
  - Expanded North St Albans – fragmented landownership does appear likely to be an issue here, but there is some uncertainty in this regard, i.e. it may be that there is agreement between landowners. The potential for abnormal development costs associated with transport can be envisaged, and it is also noted that the site promoter has proposed to deliver a scheme strongly focused on affordable housing objectives, with the proposal being to deliver 50% affordable housing overall. This is likely a positive overall, as the need to prioritise affordable housing in the St Albans context is widely accepted, but it is important to recognise that there could be implications for delivering on decarbonisation objectives.
  - SE St Albans – there are two landowners here, one of whom is the County, which is a ‘positive’ from a perspective of wishing to deliver net zero development to an exacting standards alongside affordable housing, infrastructure delivery etc. With regards to the site being promoted by a developer, the consultation response received in 2023 does include a section on decarbonisation, but there is no clear proposal to deliver a net zero development, or otherwise achieve standards beyond building regulations.
  - East St Albans – Oaklands College, as a landowners, likely has an interest in delivering a high quality scheme to be proud of. However, the College is focused on education, sports and community objectives, and the expectation is that both a primary school and a secondary school will be delivered alongside a relatively small number of new homes. This could all have implications for net zero aspirations.
- 6.6.4 With regards to significant effects, whilst all scenarios would undoubtedly see an improvement on the baseline (a situation whereby growth continues to come forward but in a less well-planned way, and without development management policy in place such that the Building Regs apply by default), there is a need to reach conclusions mindful of established objectives and targets, including the local 2030 net zero target, which amounts to a high bar to reach before predicting positive effects of any significance.
- 6.6.5 It is recognised that the District is committed to stringent DM policy aimed at built environment decarbonisation. However, it is not possible to be certain that net zero development will prove to be viable in all cases, hence there is a need to take steps through spatial strategy and site selection.
- 6.6.6 In this light, it is considered appropriate to flag ‘moderate or uncertain’ negative effects across the growth scenarios, as per the conclusion reached in the Interim SA Report (2023). Certain of the sites are associated with a theoretical opportunity (to deliver net zero development to an exacting standard), but there are few if any firm commitments / details provided on site-specific opportunities to be realised.
- 6.6.7 It is recognised that HGC represents a considerable decarbonisation opportunity on account of its scale, which is similar to Harlow and Gilston Garden Town, where detailed masterplanning work has been completed and where a Design Review Panel is now in place to scrutinise developer proposals. Also, it is also recognised that under all scenarios there would be a good proportion of growth directed to Harpenden, where development viability is very high (for example, a current proposal to deliver new homes to Passivhaus standard can be seen here). However, it is difficult to conclude with confidence that built environment decarbonisation has been a key ‘driver’ of spatial strategy and site selection. Equally, it seems likely that built environment decarbonisation has not been a key focus of adjustments made to the plan subsequent to the Draft Plan stage, as it was not a main focus of consultation responses received.

## 6.7 Communities and health

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
3	2	1	1	2	2	2	2

6.7.1 The aim here is to discuss factors other than in respect of 'Accessibility'. There are a wide range of considerations that are a focus of discussion in Section 9, but three key points for discussion here are:

- Providing for Gypsy and Traveller accommodation needs – the Interim SA Report (2023) flagged some uncertainty regarding the extent of needs and the proposed approach for addressing these. It also explained that providing for needs has been understood to be a challenge for some time, and that the scale of the challenge increased in late 2022 following a new legal precedent being established.<sup>21</sup>

Work has been ongoing since 2023, but has proved challenging, which is not uncommon. This is both in respect of establishing needs and formulating a response that balances wide ranging factors.

Certainty has increased regarding the key role that HGC will play in terms of pitch provision. In particular, HGC will provide up to 40 pitches across two publicly owned and managed sites. However, there remains a need for more work to confirm deliverability, and this supply could be in the long term.

Elsewhere in the District there is no potential to intensify or expand any of the three public sites, which can be seen [here](#). Also, at the current time there are no available and realistic options for new stand-alone Gypsy and Traveller sites (whether public or private), despite a recent [call for sites](#).

As such, attention focuses on the potential to intensify and/or expand existing private sites in the District, some but not all of which are shown on the Hertfordshire CC mapping website linked above. Broadly speaking, there is a concentration in the south of the District, with just one site in the north at Harpenden (plus one of the three public sites is located at Redbourn). It is also noted that there have recently been several new private sites granted planning permission at Colney Heath, as discussed [here](#).

Identifying the potential to intensify and/or expand existing private sites is an involved process, including because there is a need to take account of the accommodation needs of those living at each site. Work is ongoing, but there is thought likely to be capacity from intensification / expansion of private sites to meet a significant proportion of the residual need for new pitches district-wide (after having accounted for supply from HGC). However, there could still be a significant residual unmet need.

As such, attention focuses on the final option for delivering new pitches, which is delivery as part of strategic urban extensions. It is crucial that every effort is made to meet accommodation needs, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers on average having very poor outcomes across health, education and other indicators, as discussed [here](#).

However, this is not the emerging proposed strategic urban extensions that featured within the Draft Local Plan (2023). Focusing on East St Albans, which is a variable across the current growth scenarios, the commitment to delivering a new primary school and secondary school within the site serves to reduce the likelihood of there also being potential for Gypsy and Traveller pitches.

In turn, the question arises as to whether either SE St Albans or expanded North St Albans could be well-suited to delivering Gypsy and Traveller pitches (in the long term). Of the two sites it seems likely that SE St Albans has more potential, given County Council owned land and better road access options.

<sup>21</sup> The ISA Report (2023) explained: "A report presented to LPAG in March 2022 explained that there is a need for 71 pitches for those Travellers who meeting the 'planning definition', as understood from the Government's Planning Policy on Traveller Sites (PPTS, 2015). Also, the report explained a need to consider the needs of ~45 Traveller households who do not meet the planning definition. Latest understanding, following a legal case in 2022, is that local plans should consider 'cultural' need as opposed to only the needs of those who meet the planning definition... The report to LPAG proposed rolling forward the broad strategy from the previously withdrawn local plan, which looked to provide for needs primarily within larger allocations, including two sites within HGC for a total of around 30 - 40 pitches (also, the proposal was for a criteria based-policy in support of windfall supply)."

- Health facilities – all of the variable strategic sites would have the potential to deliver a new health facility within a neighbourhood centre / community hub; however, health facility requirements are set by the NHS, and the NHS policy tends to be one of focusing GP services at a smaller number of larger sites (including health ‘hubs’). The Infrastructure Delivery Plan (IDP, 2024) identifies a need for new GP space in St Albans, but delivering a new facility is not known to be a key opportunity at any of the sites in question. District-wide some facilities have spare space although GP numbers is a widespread issue.
- Community concerns (including as raised through consultation in 2023) – focusing on the variable growth locations, the key point to note is a concern with regards to the community impacts of somewhat piecemeal growth in the Chiswell Green, How Wood and Park Street / Frogmore area. This is in the context of the Government permitted SRFI and significant committed growth at Chiswell Green following recent appeal decisions. This suggests an argument for either A) limited further growth; or B) comprehensive growth with a strong focus on realising infrastructure / planning gain opportunities alongside delivery of new homes. However, on the other hand, there is a need for the Local Plan to ensure a strong emphasis on allocating a geographical spread of smaller sites, with a view to ensuring a robust housing land supply in the early years of the plan period (i.e. before strategic sites begin to deliver) in order to avoid the presumption in favour of sustainable development.

Maintaining a focus on small sites at lower tier settlements, but looking more broadly across the District, considerations are: A) sites at Bricket Wood give rise to few concerns; B) there appears to be a degree of local community support for East Redbourn; and C) Wheathampstead Parish Council are supportive of one of the emerging preferred allocations, and whilst they raise concerns with the other, they are also supportive of housing growth to deliver smaller family homes, and the context is that options at the village are now reduced on account of likely National Landscape boundary revisions.

With regards to the variable strategic urban extension options:

- East St Albans – did not generate high levels of concern through the consultation in 2023. However, it should be noted that the new homes adjacent to the west were recently developed after having been granted permission at appeal in 2017, at which time there were significant community concerns.
- SE St Albans – has never been a focus of consultation (although it did feature prominently in the Interim SA Report, 2023). There would be concerns from the local community at London Colney, in the context of maintaining a Green Belt gap to St Albans and also given important considerations around the in combination effects of growth in the south east of the District alongside growth in Hertsmere. With regards to the Green Belt point, the assumption is that a strong Green Belt gap would be retained (e.g. see Figure 5.7 and Figure 6.2), but likely concerns are acknowledged.
- North St Albans extension – there is significant local community concern regarding growth to the west of the railway line, which has been an emerging preferred option for a number of years, and it is likely that extending growth to include land to the east of the railway would heighten local concerns significantly. Traffic is one key concern, and the challenges of the site in this regard are accepted (and discussed elsewhere). Another concern is loss of accessible countryside (Sandridgebury Lane is not a public right of way, but is likely used by walkers as well as cyclists, noting that a public footpath leads to it from St Albans); however, on the other hand, there would be good potential for mitigation and targeted enhancements via a green and blue infrastructure strategy (e.g. there is an expectation that Sandridgebury Lane would be closed to traffic), and there is an argument for creating a new community with access to Heartwood Forest ‘on its doorstep’). Finally, a clear concern is regarding the identity of Sandridge as a stand-alone historic village, and this concern is acknowledged. However, from Figure 6.3 it can be seen that the proposal would be to secure a landscape buffer to Sandridgebury in perpetuity, and this buffer would be similar in extent to the existing buffer to the south of the village.

- 6.7.2 In conclusion, it is inherently difficult to place the alternative scenarios in an order of preference given so many competing factors. However, on balance it is considered appropriate to flag: support for the emerging preferred approach, which aims to balance wide ranging factors; support for Scenario 4 as this would involve removing small sites and adding SE St Albans; and a concern with Scenario 1 as this would involve removing East St Albans and would also result in a low growth strategy that could create challenges for progressing the plan in a timely fashion, leading to a risk of ongoing planning by appeal.
- 6.7.3 With regards to significant effects, the equivalent appraisal in 2023 concluded ‘moderate or uncertain positive effects’ for the better performing scenarios, and this conclusion holds true at the current time. The plan is being adjusted and iterated with a strong focus on addressing the wide-ranging community concerns that were raised through the consultation in 2023, but it is not possible to address all concerns.

## 6.8 Economy and employment

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
2	★1	★1	★1	★1	★1	★1	★1

6.8.1 There is very limited potential to differentiate between the growth scenarios under this heading, as none of the sites in question would deliver new employment land. However, it is appropriate to flag Scenario 1 as a lower growth scenario and also one that could lead to issues in respect of secondary school capacity.

6.8.2 Taking a step back from the eight defined growth scenarios, it is very difficult to envisage a reasonable higher employment land scenario, because the emerging proposed strategy involves over-provision / provision for unmet needs from elsewhere, as discussed further in Section 9. Numerous locations well linked to an M25 or A414 junction in the south of the District could feasibly be considered for industrial / logistics uses, but there is no clear strategic case at the current time. There is also a need to recall the influence that the Government permitted SRFI will have on this part of the District; and, at a settlement level, whilst the far southeast of the District around London Colney is more distant from the SRFI, there is existing committed growth and ongoing pressure for housing growth, plus there is a case for considering any strategic employment growth in collaboration with neighbouring Welwyn Hatfield District.

6.8.3 With regards to significant effects, the conclusion is as per that reached in 2023, namely that the approach to allocating land for new employment floorspace – both industrial/logistics and R+D – under all scenarios is highly proactive. Also, there is support for providing housing need in full, given the importance of supporting a local workforce suited to the local employment opportunities, including in key growth sectors linked to Herts IQ, which is a regionally or even nationally important cluster associated with high productivity knowledge sector jobs. Also, the context is that the Government has recently emphasised that housebuilding is an engine for economic growth, and in Hertfordshire a major new initiative is underway to adopt a new Economic Strategy by early 2025, led by Hertfordshire Futures, superseding one prepared eleven years ago. Finally, there is support for HGC in that it will support regeneration in the wider Hemel Hempstead urban area, including potentially in support of jobs creation and wider objectives.

## 6.9 Historic environment

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
2	2	★1	2	2	3	2	2

6.9.1 The order of preference reflects a view that:

- The non-strategic Green Belt allocations at lower tier settlements that feature in four of the scenarios give rise to overall limited concerns, hence the scenarios that see these sites removed from the plan are not supported from a historic environment perspective. Specific considerations are:
  - Redbourn – the southern component of the East Redbourn site would gain access from a point on A5183 a short distance from a sensitive part of the Redbourn Conservation Area, namely the high street, and there are long views here along a straight (presumably Roman) road. Also, there is the historical context of the Nickey Line and the bridge over the River Ver. However, it seems likely that a modest number of homes could be delivered without generating significant concern.

- Wheathampstead – both of the proposed allocations were flagged in 2023 as generating historic environment concern. However, in both cases concerns should now be allayed in light of heritage impact assessment (HIA) work and associated adjustments to site policy. With regards to the western site, there is now reduced concern regarding impacts to Amwell Lane, whilst at the latter site the concerns raised by Historic England in 2023 regarding a near adjacent scheduled monument (Devils Dyke; also associated with the Hertfordshire Way) should now be allayed.
- Chiswell Green, How Wood and Park Street / Frogmore – this area overall has relatively limited historic environment constraint, bar Frogmore, where the current proposal (an adjustment from 2023) is not to allocate any sites. Burston Nurseries (How Wood) is constrained by a Grade II\* listed manor house, but impacts must be considered in the context of existing built form on the site as well as in the context of the adjacent permitted site. Finally, at Park Street the proposed allocation will impact the landscape on the approach to the Park Street and Frogmore Conservation Area along Watling Street, and it is noted that there are characterful early to mid-20<sup>th</sup> century homes in the vicinity of the site, but concerns are overall limited. It is notable that land adjacent to the site was historically a large sewage works.
- SE St Albans – is subject to limited constraint overall. However, there would be a strong case for buffering and protecting the character / landscape setting of Tyttenhanger / Tyttenhanger Green. In particular, there is a prominent and attractive Grade II listed cottage that currently clearly draws upon the site for its landscape setting, and public footpaths in the vicinity also add to the degree of sensitivity.
- North St Albans extension – there are two distinct considerations here.
  - Firstly, a clear concern is the potential to impact on the historic setting of the Sandridge Conservation Area, as well as Sandridgebury (two Grade II listed buildings) and Sandridgebury Lane. However, and as discussed above, the firm proposal is to secure a landscape buffer to Sandridge in perpetuity, and the effect could be to minimise pressure for problematic piecemeal expansion over time.
  - Secondly, the eastern extent of Beech Bottom Dyke, which is a scheduled monument, is located at the southwest extent of the site. It is associated with a significant woodland corridor, but this is bisected by the railway line, with it appearing to be the case that, whilst the part of the Dyke to the west of the railway line is accessible, the part to the east (adjacent to the site) is not. It is also noted that there is an area of land here outside the submitted site boundary that, were it to be brought into the site boundary, could feasibly provide an opportunity to deliver a new area of parkland linked to the Dyke.
- East St Albans - gives rise to few historic environment concerns. This was historically farmland associated with the Oaklands Estate (including extensive woodlands) to the south. The bridleway that runs along the eastern edge of the site is shown on historic mapping but appears to have limited historic character (in contrast to Nightingale Lane through SE St Albans).

6.9.2 With regards to significant effects, whilst for the majority of the scenarios a neutral effect can be predicted (as per the conclusion reached across most scenarios appraised in 2023), it is appropriate to flag a 'moderate or uncertain negative effect' under the worst performing scenario. Under this scenario two additional urban extensions to St Albans could have a degree of in-combination impact to the setting of a cathedral city of renowned historic importance (albeit the historic core is some way distant from the sites), plus deletion of small sites could create issues for progressing the plan (given the importance of early supply from small sites) and, in turn, create a risk of ongoing problematic planning by appeal.



*The historic environment is an important constraint to growth within parts of the District*

## 6.10 Homes

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
4	4	2	3	3	2	1	1

- 6.10.1 A starting point is understanding of Local Housing Need (LHN), as understood from the LHNA (2024), and as already introduced in Section 5.4. The headline is that understanding of LHN is broadly unchanged since 2023 (it is slightly reduced, reflecting the latest affordability ratios, which are lower for much of the South of England relative to the previous year's), although it is acknowledged that the LHNA reaches this conclusion on balance, after having given detailed consideration to the possibility of there being 'exceptional circumstances' to warrant departing from the Government's standard methodology (for calculating housing need). It was suggested by Redbourn Parish Council in 2023 that it was *"both irresponsible and a waste of time and resources for SACDC to publish a Draft Local Plan proposing to release broad swathes of the Green Belt based on housing need / requirement figures that it has no faith in and that it expects to change by early 2024."* However, as it transpires understanding of housing need has not changed, and the quotes from recent appeal decisions should also be read as context (see Section 2, above), specifically with a view to understanding the perception of housing need in the District. Furthermore, context comes from the Government's new draft standard method for calculating need.
- 6.10.2 A number of the scenarios perform well because they would involve a level of supply that allows for the housing requirement to be set at LHN along with a supply buffer (i.e. a situation whereby the supply exceeds the total housing requirement over the course of the plan period).<sup>22</sup> Reliance on strategic sites and urban supply, which tend to be associated with delivery risk, is a reason to support a supply buffer, and it is also the case that a number of the non-strategic sites discussed as emerging preferred options in Section 5.4 are associated with a degree of delivery risk, e.g. ahead of confirming access arrangements.
- 6.10.3 In particular, the higher growth scenarios perform well because they would enable a larger supply buffer or, alternatively, might enable the housing requirement to be set at a figure modestly above LHN. This latter approach would likely be with a view to making more provision for locally arising affordable housing needs but could also feasibly be with a view to making some provision for unmet need from elsewhere.
- 6.10.4 In contrast, Scenarios 1 and 2 perform poorly as lower growth scenarios, where there would be a need to set the housing requirement below LHN (also recalling the need / importance of a supply buffer). This would mean that the Local Plan generates unmet need, which would put the progress of the plan at risk, recognising that there is very low likelihood of a neighbouring authority agreeing to provide for housing need arising from St Albans.
- 6.10.5 Furthermore, under Scenario 2 there would be reduced supply early in the plan period, which is the most important part of the plan period from a housing perspective, given the urgency of addressing housing needs and also given the potential to boost supply for latter years through a plan review. Under all scenarios the supply would be somewhat weighted to the middle and latter parts of the plan period such that there would be a need for a 'stepped' housing requirement (this was the proposal at the Regulation 18 Draft Plan stage, as set out in Table 3.2 of the plan document, and few concerns were raised with this approach),<sup>23</sup> but there would be a need for a bigger 'step' under Scenario 2. Also, there would be a need for a bigger 'step' in the housing requirement under Scenarios 4 and 5 relative to Scenario 3 (due to replacing small sites at lower tier settlements with a strategic site that would take time to deliver).

<sup>22</sup> A supply buffer is important from a perspective of ensuring that supply does not dip below the annualised housing requirement at any point in the plan period (which could lead to a risk of being subject to the presumption in favour of sustainable development, albeit the effect of this would likely be to redress the situation by allow for additional homes to be delivered).

<sup>23</sup> The Home Builders Federation (HBF) commented: *"As set out in paragraph 68-021 of PPG the Council will need to provide evidence as to why they consider the use of a stepped trajectory is necessary and that the proposed trajectory does not seek to unnecessarily delay meeting identified development needs."*



- 6.10.6 In wider respects there is limited potential to confidently differentiate between the growth scenarios. A consideration can tend to be varying development viability, with a view to confidence regarding delivery of a policy compliant quota of affordable housing (alongside meeting wider policy requirements / delivering on wider objectives, e.g. net zero development). However, in this regard the overriding consideration is that development viability is generally strong across the District.
- 6.10.7 One consideration is at Wheathampstead, where development viability is strong and the Parish Council's consultation response received in 2023 highlighted support for new affordable and small family homes.
- 6.10.8 With regards to Redbourn and the cluster of villages in the southwest of the District, it is more difficult to confidently suggest that there are locally arising housing needs that might risk going unmet without new allocations. However, one consideration is the links between this area (particularly Bricket Wood) and the north of Watford Borough, where the adopted Watford Local Plan allocates very little land for housing growth (with growth mainly from flats in and around the town centre, and, in this regard, it is noted that the Local Plan Inspector's Report refers to new family homes as a "rare opportunity" in the Watford context).
- 6.10.9 A final consideration is delivery risk; for example, it has already been highlighted that there is some outstanding uncertainty regarding the extent to which multiple land ownership is an issue at expanded North St Albans (also uncertain transport infrastructure costs). Also, there is a need for further work to confirm safe/accessible access arrangements at two or three of the variable non-strategic sites at lower tier settlements. However, delivery risk can be mitigated by taking a precautionary approach to delivery timescale / phasing assumption, and with a supply buffer. Also, the presumption in favour of sustainable development is in place to rectify under delivery against the committed housing requirement (albeit homes under the presumption can tend to come forward in sub optimal locations).
- 6.10.10 In conclusion, there is a need to factor in not only total growth quantum, but also the mix of sites, particularly with a focus on minimising the need for a stepped requirement. With regards to significant effects, it is recognised that there is an element of uncertainty in light of the Government's new proposed standard method for calculating housing need (July 2024), as discussed in Section 5. The proposed new method assigns St Albans a housing need figure that is a 75% increase on the current figure; however, the current figure is used for the basis for preparing the plan (because of transitional arrangements).

## 6.11 Land, soils and other resources


Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
=	=	=	=	=	=	=	=

- 6.11.1 A foremost consideration here is the potential for loss of agricultural land classed as 'best and most versatile' (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a. The nationally available "provisional" agricultural land quality dataset classes the great majority of land in the District as 'grade 3', which may or may not be BMV (the dataset does not differentiate between grades 3a and 3b), and there is a concentration of grade 2 quality land within the central and southern central parts of the District (i.e. St Albans and land to the east and west). However, it is important to note that the dataset is very low resolution (for example, it does not recognise Wheathampstead as an urban area). Another dataset is available showing agricultural land quality with a much higher degree of resolution and accuracy, namely the "post 1988" dataset (see [magic.gov.uk](https://www.magic.gov.uk)), but this dataset is very patchy.
- 6.11.2 In light of these introductory points, key points to note regarding the variable growth locations are:
- A number of the variable non-strategic sites include an element of brownfield land and/or comprise greenfield land not in agricultural production and with limited or no realistic potential of being used for agriculture (which is not to say that the land could not be used for food growing, e.g. allotments). However, several are in use for agriculture, notably at Wheathampstead and Park Street.
  - East St Albans appears likely to comprise BMV agricultural land. Specifically, this is on the basis of adjacent land having been surveyed and found to comprise a mix of grades 2, 3a and 3b quality land.

Also, it is noted that land not too far away – specifically at Bowmans Cross – has been surveyed and been found to comprise grade 1 quality land (including where the national dataset suggests grade 3).

- 6.11.3 A further consideration is the potential for sterilisation of minerals resources that could potentially be viably extracted, with much of the District (less so Harpenden) intersecting a Minerals Safeguarding Area, as understood from the [policies map](#) of the emerging Draft Hertfordshire Minerals and Waste Local Plan. A sand and gravel safeguarding area covers most of the central and southern part of the District, and HGC also partially intersects a Brick Clay safeguarding area. However, it is also important to note that safeguarding is not absolute, Practice Guidance (Mineral Products Association, 2019) explaining: *“Where other considerations indicate that a proposed site allocation within an MSA is appropriate... [employ] mitigation measures to reduce the... amount of resource sterilised.”*
- 6.11.4 In conclusion, it is not possible to differentiate between the alternatives with any confidence. There is an argument for highlighting a preference for Scenario 1, but this is a low growth scenario that could generate unmet need and, in turn, pressure for housing growth on BMV agricultural land elsewhere.
- 6.11.5 With regards to significant effects, broadly neutral effects are predicted. Whilst there would be significant loss of productive agricultural land under all scenarios, it seems likely that the majority would not be of ‘BMV’ quality, and under all scenarios best use will be made of previously developed / brownfield land.

## 6.12 Landscape

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
<b>2</b>	<b>3</b>	<b>1</b> 	<b>2</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>2</b>

### 6.12.1 By way of context:

Whilst there are no nationally designated landscapes intersecting the District, the north / northwest part of the District is associated with the dip slope of the Chilterns and, in turn, is associated with a series of valleys / dry valleys and raised plateaus. In turn, this landscape pattern is associated with long distance views and characteristic land uses, for example areas of woodland and common land, as well as characteristic settlement pattern. It is important to note that a Chilterns National Landscape (NL) boundary review is underway, which might see the NL extended into the District. Also, it should be noted that the adopted Local Plan (1994) includes an extensive local landscape designation in the north of the District, but the proposal is not to take this forward in the new Local Plan (with the context being that local landscape designations that restrict development must be strongly evidenced).

With regards to the southern part of the District, this is a [valley / vale](#) associated with the River Colne – a major tributary of the Thames – with a clay dominated, but complex geology that also includes glacial and peri-glacial deposits (from the last Ice Sheet to reach into Hertfordshire, namely the Anglian Icesheet) and the deposits from the proto-Thames (i.e. the route of the Thames prior to the Anglian Icesheet). The geology and topography supported extensive 20<sup>th</sup> Century settlement and transport infrastructure, as well as minerals extraction (sand and gravel) and hospitals sites. There is also a concentration of historic estates, reflecting links to London. Both the Bricket Wood and Colney Heath areas historically comprised extensive woodland and common land, reflecting the nature of the geology and soils.

A key issue is maintaining settlement separation in the southern part of the District. However, on the other hand, the settlement pattern in this area is primarily a 20<sup>th</sup> century construct, with the only pre-20<sup>th</sup> Century conservation areas at Park Street and Frogmore (located on Watling Street, an ancient route linking Dover to the Midlands) and London Colney (a small historic core at a crossing point of the R. Colne).

Across the District there is also a need to consider the London Metropolitan Green Belt, which is not a landscape designation but is indicative of a landscape that is sensitive in the sense that countryside encroachment and loss of settlement separation can be issues that generate concern.

### 6.12.2 Key considerations are as follows:

- Non-strategic sites at lower tier settlements – most give rise to few landscape concerns, in that they are well-contained within the landscape by existing built form, transport infrastructure or landscape features such as strong hedgerows.<sup>24</sup> This will correlate with limited landscape sensitivity. However, one site does stand-out as being subject to landscape constraint, namely Amwell Top Field (60 homes), at the southwest edge of Wheathampstead. See discussion of specific sensitivities above, in Section 5.4.

The other site subject to a notable degree of constraint is then West of Watling Street, Park Street, where there is a pending planning application. The site is visible from the Watling Street and so does contribute to the sense of a gap between St Albans and Park Street / Frogmore, but it is quite well contained in Green Belt terms, noting that the land to the west (which also includes a Gypsy and Traveller site and an electricity substation) is a former sewage treatment works and so associated with contamination.

**Figure 6.4:** The West of Watling Street site boundary



<sup>24</sup> The Inspector examining the previously submitted St Albans Local Plan (2018; withdrawn 2020) was critical of the lack of smaller sites in the plan, stating: "It also recognises that it is possible that additional potential small-scale boundary changes that would also not compromise the overall function of the Green Belt..."

- East St Albans – is subject to relatively limited landscape constraint, noting that the eastern edge of St Albans is associated with the relatively flat landscape of the Colne Valley, as opposed to the raised, rolling landscape of the Chilterns dip slope. Also, there is a need to consider that there is currently built form adjacent to the north of the site, as well as to the south (Oaklands College and, beyond that, along Hatfield Road). However, on the other hand, the landscape / Green Belt gap to Hatfield is a sensitivity, and there is also a need to note that a public bridleway runs adjacent to the site. The bridleway could assist with securing a new Green Belt boundary, but the potential for comprehensive growth in this area in order to secure a long term defensible boundary is a consideration, as discussed above. The adopted Welwyn Hatfield Local Plan (2023) does not allocate any growth in the gap between St Albans and Hatfield, but land is being promoted in this area, including adjacent to the M1 / A414 junction.
- Expanded North St Albans – land rises from the B651 to a modest high point associated with a strong hedgerow and an area of woodland, hence there would be some potential for a modest scheme east of the railway to be well-contained in landscape / Green Belt terms. Also, the land here is primarily owned by the County Council, whilst land ownership is less certain and potentially more complex further north.

Were growth to extend beyond this high point it is difficult to see a logical means of containing expansion short of the Hertfordshire Way and Heartwood Forest. This would mean growth extending past Sandridgebury Lane, which following the course of a shallow valley.

Also, an expanded North St Albans scheme could suggest a need to consider additional growth to the west of the railway, i.e. the emerging proposed allocation that is held constant across the current growth scenarios. Specifically, there could be pressure to expand the scheme beyond the tree belt that is proposed to contain the northern edge of the site (the site is shown to extend beyond the tree belt in Figure 6.3, although it is important to reiterate that this is simply a concept plan suggested by the site promoter). There would be a landscape / Green Belt argument against taking this step, and it is also important to note that new homes here would be ~3.5km from St Albans train station.

- SE St Albans – this is flat and low-lying land, and there would appear to be fairly good potential to define a new defensible Green Belt boundary, with the new urban edge defined by cemetery, a strong hedgerow associated with a public footpath and a field behind Highfield Farm that would be well-suited to delivering a new parkland. There would then be a landscape / Green Belt gap of over 400m to the A414 (with London Colney beyond) and there would be little concern regarding future development creep to the east. There appear to be few concerns regarding impacts to views from the London Road on the approach to the St Albans Conservation Area, but views from Highfield Lane at the eastern edge of the site are more sensitive, as discussed above. There would also be landscape impacts associated with the public rights of way through the area, including Nightingale Lane, which is likely to be a popular route linking St Albans to London Colney. It is noted that a scheme would extend beyond a significant area of woodland planting dating from ~2005, and presumably delivered including with a view to securing a new defensible boundary to the urban area, following development of Highfield Park.

- 6.12.3 In conclusion, there is not support for removing either East St Albans or the package of small sites at lower tier settlements, from a landscape perspective, including recalling the need to progress a plan with a robust land supply to end planning by appeal and the landscape impacts associated with it. The two emerging strategic omission sites are both subject to a degree of landscape constraint, and this appears to be particularly the case for expanded North St Albans (but SE St Albans is also sensitive given the need for a landscape gap to London Colney), but the primary concern is recorded as allocating both sites, as it can be envisaged that there would be in combination effect resulting from strategic expansion of St Albans to the north, east and southeast (albeit the most sensitive landscape, to the west, would be protected).
- 6.12.4 With regards to significant effects, whilst the equivalent appraisal in 2023 predicted 'moderate or uncertain negative effects' across all scenarios, it is now considered appropriate to predict a neutral effect for the best performing scenario, in light of consultation responses received and adjustments made to the strategy / approach at certain site allocations since the consultation. Most notably, this includes removing four proposed allocations that are now thought likely to fall within a revised Chilterns National Landscape. Also, there is a need to recall the context of providing for LHN in full in order to avoid increased pressure on neighbouring local authorities subject to landscape constraint, for example with the Chilterns NL constraining Dacorum and narrow Green Belt gaps between settlements in other neighbouring areas.

## 6.13 Transport

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
4	3	2	1	3	4	2	2

### 6.13.1 By way of context:

Transport objectives are centrally important to local plan spatial strategy / site selection nationally, and this is particularly the case within the St Albans context. Aims are to minimise the need to travel (i.e. ensure new homes in proximity to key destinations), support modal shift away from the private car towards public and active transport (also mindful of ‘future mobility’ options) and also support the national switchover to electric vehicles (EVs; also mindful that hydrogen vehicles could play an increasing role) alongside micro-mobility and use of technology. Support for the achievement of transport objectives will have wide-ranging benefits in respect of other key objectives for the Local Plan, including decarbonisation.

### 6.13.2 In light of these introductory points, key points to note regarding the variables are:

- Growth quantum – there is a clear need to provide for housing needs as close to source as possible, from a transport perspective. Furthermore, early commitment to providing for LHN in full, as opposed to generating unmet need to be provided for elsewhere within a constrained sub-region, is conducive to early and effective strategic transport planning, e.g. planning for sub-regionally significant infrastructure.
- Variable non-strategic sites at lower tier settlements – it is important to note that site selection has been strongly ‘driven’ by the findings of the Green Belt review, and there will not always be a strong correlation between performance of a site option in Green Belt terms and performance in transport terms. However, none of the variable sites in question stand-out as problematic in transport terms, and there are some notable plus points, in particular: the sites at Chiswell Green, How Wood, Park Street / Frogmore and Bricket Wood are within walking distance of an Abbey Line station;<sup>25</sup> and East Redbourn is well-linked to the Nickey Line (cycle route) and also the village centre (particularly the southern part of the site). This leaves the two sites at Wheathampstead, where there is limited transport argument to be made, other than in the sense of a likely need for some growth at the village to support services/facilities.

The other point to note is that there is a need for ongoing work to confirm safe / suitable and viable access arrangements for several sites. However, this is a technical matter for consideration by specialists and through engagement with the site promoter, such that it is difficult to comment further. East Redbourn is one site where access could potentially prove challenging in road safety terms (discussed in Section 5.4), and the site northwest of Bricket Wood is also notable in the sense that it has now been confirmed that “*access from the A405 is not likely to be acceptable in either technical or policy terms.*” Also, at this site it has been established that there may be an opportunity to support LCWIP aspirations and also that development “*must not rely on pedestrians walking and cycling along the currently narrow path along the side of the North Orbital road [A405].*”

- East St Albans – performs reasonably well in transport terms, given a location at a top tier settlement and also given good links to Hatfield. However, opportunities are quite limited as follows (albeit there is also a need to recall the context of delivering / supporting educational and wider community uses):
  - “*Measures to ensure high quality access and connectivity to St Albans centre, station and education, aligned to schemes in the GTPs and LCWIP are required. In particular, measures to access the Alban Way route to the south will be required.*”

<sup>25</sup> Also, the villages in the southwest of the District are located within cycling distance of key employment areas, and there is a National Cycle Network link to St Albans. However, the largest site at Bricket Wood is located at the point of the village most distant from the station and also the primary school. Also, at How Wood there is a need for further work to confirm walking / cycling links between Burstons Nurseries and the village centre / train station to the east, noting intervening woodland and given that the A405 is a barrier to movement to the west.

- Particular focus on the existing rights of way within and surrounding the site will be required, also including a link to Jersey Lane.
- Footpath 004 Colney Heath (East Drive) should be upgraded to Bridleway status and improved to enable Active Travel to Hatfield, the UoH and Ellenbrook Fields.
- A link for Active Travel from upgraded FP 004 to the Hatfield Road (Boggymead Springs).
- Provision of an E/W route for pedestrians, cyclists and horse riders. Provision of an E/W route for pedestrians, cyclists and horse riders between BR 051 Sandridge and Central Drive, St Albans.”

Focusing on the Alban Way, it should be noted that this is located some way to the south, but still could serve as a route from the site to the train station. A focus on the Alban Way and the associated A1057 bus corridor serves as a reason for remaining open to exploring comprehensive growth options.

- Expanded North St Albans – the Interim SA Report (2023) stated: “...this is potentially highly problematic from a transport perspective, as access would need to be via the B651, where there is understood to be little or no potential for upgrades, e.g. to introduce a cycle route. Also, the train line is a barrier to movement.” However, the site promoter then submitted a very detailed representation responding to concerns raised, and a key point to note is that the proposed/assumed capacity has been revised down significantly to 1,400 homes. The site promoter states in summary that: “The SA is over-egging the challenge. Moreover, an in-combination or phased strategy on both sides of the railway would enable the expansion area to tie into the networks of site B1 and vice versa. Railway severance is not ‘ideal’ but safe flows for all users, and a combined bus routes/service, can be achieved via either of the flow management approaches set out by Pegasus.” With regards to the Pegasus report submitted alongside of the consultation response, the following summary is provided:

- “The lack of a direct connection to the strategic road network (SRN) is not a suitability or achievability issue in absolute terms. Indeed, direct connection to the SRN is more likely to generate car-based trips if there is not public transport service on the SRN.
- A relatively modest primary access junction (a 28m ICD roundabout) is needed and can be achieved at the junction of St Helier Road and the B651. Thus 1,400 homes can be accessed from the B651.
- Active travel connectivity for much of the site would funnel through the site to the west of the railway, with both sites utilising Sandridgebury Lane as a ‘green lane’. Its active travel function on both sides of the railway will be enhanced via the introduction of a new highway system around it. For residents closer to the B651, cycling improvements can be delivered on the axis of this road. Travel through the quiet residential roads immediately to the east of the would entail a minor deflection/diversion for cycling trips southwards and a fall-back route.
- Buses already use the B651 and a good service can be provided to a stand-alone site or a development that links to the proposed allocation west of the railway.”

Overall, inherent concerns do still remain, but it is accepted that there are a range of detailed options for avoiding and mitigating impacts, and potentially realising opportunities. No comments were received on the expanded North St Albans option through the consultation in 2023 other than from the site promoter, but it is not clear that this necessarily serves to indicate a lack of challenge/concern in transport terms.

- SE St Albans – this site appears to perform no worse than the two emerging strategic urban extension options that were proposed for allocation in 2023 and hence were a focus of consultation (including the detailed consultation response received from the County Council, namely North St Albans and East St Albans). Connectivity to the town centre and train stations is similar or better, and the site is well-connected to the strategic road network. The LCWIP discusses the potential for a new cycle route along the A1081 London Road, and the possibility of growth here (in combination with growth elsewhere) to support aspirations for delivering strategic upgrades to the A414 might be envisaged. However, on the other hand, in-combination traffic impacts with the Government permitted SRFI could be an issue.
- In combination impacts – are clearly an important consideration from a transport perspective. Focusing on the variable growth locations, there is a clear need to flag the possibility of a high growth strategy for St Albans itself (Scenario 6) leading to problematic traffic congestion. Modelling has not been undertaken to explore the precise implications of Scenario 6 (i.e. very strategic urban extension to the north plus modest strategic urban extensions to the east and south, plus several small allocations and growth in the urban area), and it is recognised that strategic enhancements to the A414 corridor could alleviate traffic pressures in the long term, but at the current time there is a need to flag a significant risk.

6.13.3 In conclusion, the order of preference reflects: A) there is not support for lower growth, nor for high growth at St Albans; B) there is a modest degree of support for removing smaller allocations at lower tier settlements; and C) there is a preference for SE St Albans over expanded North St Albans.

6.13.4 With regards to significant effects, the ISA Report (2023) concluded a ‘moderate or uncertain positive effect’ for the preferred approach at that time, and there is now greater confidence in this conclusion in light of consultation responses received – most notably from the County Council – and ongoing work to explore transport issues and opportunities, including transport modelling work and detailed work to explore the potential for growth to deliver targeted enhancements to the District’s active travel network. However, it is not possible to predict ‘significant’ positive effects given ongoing work (on HGC, strategic sites and some non-strategic) and because inherent challenges remain locally, given the densely populated nature of the south of the District (also noting recent sites unexpectedly gaining permission at appeal) and given inherent transport challenges at Harpenden (including noting likely future expansion of Luton Airport).

## 6.14 Water

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
2	2	1	1	1	3	3	3

6.14.1 **Wastewater / sewage treatment** is often a key issue for local plans and is high on the agenda nationally and locally at the current time. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works, with the other consideration being the biological and chemical capacity of the receiving water course to accept an increase in treated water). However, there are major cost and lead-in time implications, and a risk of unforeseen issues and delays.

6.14.2 As such, there is a need to provide the water companies with early certainty regarding growth locations, including in respect of total growth quantum within St Albans District. Also, strategic growth locations can be conducive to planning for strategic infrastructure upgrades (also measures aimed at water efficiency).

6.14.3 The Hertfordshire Water Study was published in 2017, such that it is now somewhat dated. Section 8.6 of the 2017 Study deals with St Albans, giving consideration to strategic interventions needed on the basis of growth assumptions, and then the overall conclusion of the Study is as follows:

*“The majority of the indicative growth areas (identified to facilitate the modelling) for the 2021 and 2031 scenarios are grouped into three areas, Harpenden, East Hemel Hempstead and east of Albans. By 2051, other indicative growth areas become focused to the southeast of St Albans (adjacent to Hatfield), south of St Albans, adjacent to Watford and around Redbourn. [Conclusions are:]*

- Any development proposals around the southern and eastern edges of St Albans are likely to require strategic intervention in 2051, potentially linked to large-scale trunk sewer upgrades
- The evaluation indicates... uncertainty in 2051, with the high scenario demonstrating strategic intervention could be required across the southern part of the District (mainly to improve the capacity of Maple lodge STW and Blackbirds STW). This scale of intervention could require... local planning policies and / or construction methods to limit foul flows and promote large-scale water recycling.”

6.14.4 It is also important to note the Dacorum section of the Study (Section 8.2), including discussion of the case for focusing growth at Hemel Hempstead in order to minimise pressure on Berkhamsted.

6.14.5 Furthermore, there is a need to note the sections of the Study dedicated to key sub-catchments:

- Harpenden (Section 9.8) – the Study raised few concerns: “All foul flows are served by a single sewer network which discharges into Harpenden STW...The strategic water infrastructure needs are likely to be limited to local network upgrades, potentially requiring focused planning from 2021...”

- Hemel Hempstead (Section 9.9) – more significant concerns are raised: *“All foul flows are served by a single sewer network, part of the larger strategic network which discharges into Maple Lodge STW. The strategic water infrastructure needs are likely to be short-term water quality, within the upper reaches of the River Gade through into central Hemel Hempstead, and long-term treatment capacity at Maple Lodge STW. Water quality could become a major driver of investment due to the current poor classification of the River Gade (in this location)...”*
  - St Albans and Upper Colne Valley (Section 9.13) – *“This sub-catchment has been defined based on the extent of the trunk sewer network discharging to Maple Lodge STW, upstream of the Blackbirds SPS, which includes St Albans, Hatfield, Potters Bar, London Colney, Borehamwood and Radlett. It covers the majority of the St Albans District, the eastern half of Hertsmere and the southwest section of Welwyn Hatfield. The strategic water infrastructure needs are likely to primarily be network capacity, requiring specific intervention for 2021 and more widespread investment for 2051 to facilitate the extensive projected growth around St Albans, Potters Bar, Radley and South Colney.”*
- 6.14.6 Further evidence in respect of wastewater / sewage treatment comes from a nationally available mapping resource showing the location of sewage treatment works (STW) locally and also the incidences of hydraulic capacity breaches leading to untreated sewage being discharged. It does not serve to indicate particularly high rates of sewage discharge within the District but does potentially indicate an issue downstream at Maple Lodge STW (south of Rickmansworth), where the sewer storm overflow spilled 52 times for a total of 650 hours in 2023 (albeit the Colne is quite a large river at this point).
- 6.14.7 Finally, evidence comes from the emerging St Albans Infrastructure Delivery Plan (IDP, 2024), which finds:
- “The majority of wastewater from the St Albans region is treated at the Maple Lodge STW, and the treatment works is already operating at close to capacity and frequently gets overwhelmed and causes overflows. However, during stakeholder engagement in April 2024, Thames Water indicated that Maple Lodge has sufficient capacity to support growth to 2030. Work is currently progressing with the design of upgrades to the wastewater treatment works with anticipated delivery around the end of AMP8 (2025-2030). The Maple Lodge catchment is very large and covers multiple local authorities, so it is important that growth in St Albans is aligned with growth in the rest of the catchment area to avoid worsening capacity issues at the STW. Thames Water noted that groundwater has a significant impact in the Maple Lodge catchment in this area and they are investigating projects to reduce the impacts of this.”*
- 6.14.8 It is noted that Maple Lodge STW is not one of the 15 recently identified by Thames Water for upgrade in early 2024; however, the situation is complex and changeable, with latest updates presented at: [www.thameswater.co.uk/about-us/regulation/our-five-year-plan](http://www.thameswater.co.uk/about-us/regulation/our-five-year-plan). Maple Lodge STW is briefly mentioned within the Hertfordshire section of Thames Water’s Drainage and Wastewater Management Plan (DWMP, 2023), which finds that with the DWMP there will be few issues by 2050. It is also noted that the DWMP does not consider Hemel Garden Communities, which potentially represents an opportunity missed (i.e. earlier certainty on HGC could have enabled explicit consideration).
- 6.14.9 In addition to wastewater treatment, **water supply** can be a key issue within problematic water resource zones, as established by the work of water companies and the Environment Agency. As well as leading to impacts for potable water supply, ‘water stress’ also affects the natural environment; for example (and notably) there is a risk of problematic low flows affecting the internationally important chalk streams that drain the Chilterns within the District and elsewhere in the sub-region, flowing into the Rivers Colne and Lee (which, in turn, are tributaries of the River Thames). However, water companies put in place long term plans to balance water supply and demand, and there are not currently any water resource zones that are known to be problematic to the extent that there is a clear constraint to strategic growth.
- 6.14.10 The District is supplied water by Affinity Water (whilst wastewater is managed by Thames Water), which has a legal requirement to supply water to new developments. Affinity Water has produced a Water Resources Management Plan (WRMP) which sets out how it plans to provide a reliable, resilient, efficient and affordable water supply to customers whilst protecting the environment. At the core of this is the need to balance the amount of water available for supply with the demand for water.
- 6.14.11 The most recent WRMP covers the period 2020-2080 and identifies a significant supply / demand deficit in the Central Region (which covers St Albans District); which it plans to address through demand management and leakage reduction measures, and through transferring water from neighbouring areas.



**Box 6.1: Summary of consultation responses in respect of water-related issues/objectives**

The **Environment Agency** (ref.426) flagged issues around water supply, wastewater treatment constraints and other matters relating to the water environment. Specific points included:

- “We would also recommend editing the CE1 policy to include the requirement for significant housing developments [ those which require an [EIA] to conduct a site-specific water cycle study...”
- “Our abstraction licensing policies (ALS) set out the water availability. The Colne and Upper Lee ALSs are relevant for the St Albans district council area. These indicate that no new water supply options are available... [but] we have been seeking various reductions to existing water company abstraction sources in these areas, including the Ver catchment. There are agreed licence reductions already in place in the Upper Lee and Colne ALS areas, with further changes to be implemented in the Ver catchment by... 2025.”
- “Additional sources of water will need to come from within the wider resource network operated by Affinity Water. This could place additional pressure on neighbouring areas, which have similar river flow challenges, are also chalk stream habitats and located within the Colne and Upper Lee ALS areas. To contribute towards minimising such implications it is necessary to take a strategic approach to water supply... As a result, it’s imperative to undertake comprehensive engagement with the local water company when developing water cycle studies. Additionally, incorporating a high standard of water efficiency [in developments]...”
- “Our publicly available data indicates that Maple Lodge STW that services St Albans district is approaching its dry weather flow limit, and the storm tanks discharge frequently. This suggests the site is reaching capacity and upgrades may be required to accommodate additional load.”

With regards to the **water companies**, Affinity Water responded only as an omission site promoter, whilst Thames Water’s response said little on spatial strategy / site selection beyond:

*“St Albans district is served by a number of sewage treatment works (STWs) including Maple Lodge, Blackbirds and Harpenden STWs with Harpenden STW located within the district on the eastern edge of Harpenden. The locations and scale of development within the catchment for each works proposed through the Local Plan will feed into future business plans helping to ensure that upgrades to the treatment works are delivered when required. Upgrades to the sewerage network may also be necessary as a result of individual developments and it is important that the Local Plan helps to ensure that any necessary upgrades are delivered alongside new development. Developers should be encouraged to engage with Thames Water to discuss their development proposals ahead of the submission of any planning applications to help align infrastructure delivery...”*

## 6.14.12 The Interim SA Report (2023) concluded as follows:

“In conclusion, it is not possible to differentiate between the growth scenarios with any certainty at this stage. There is theoretical support for setting the housing requirement at LHN, with a view to early and effective planning for water infrastructure... [in a constrained sub-region]. However, it could potentially be the case that there are particular constraints affecting St Albans.... With regards to HGC... there is support for growth at scale, but there is a need to confirm wastewater treatment options, e.g. noting potential issues affecting Maple Lodge STW... There is also a question-mark regarding the high growth scenario for St Albans... and also possibly a high growth strategy for Harpenden... With regards to significant effects, it is appropriate to flag ‘moderate or uncertain’ negative effects at this stage, ahead of receiving consultation responses from the Environment Agency, Thames Water and Affinity Water. Comments on the relative merits of the growth scenarios would be welcomed.”

## 6.14.13 This conclusion broadly still holds true, but there may now be increased confidence regarding the achievability and timing of capacity upgrades at Maple Lodge STW, and no additional concerns have been raised regarding the impacts of growth in St Albans in combination with growth in other LPAs on the STW. It could feasibly be the case that reduced supply from small sites earlier in the plan period helps to avoid issues with capacity at the STW, but there is little reason to suggest this is a significant issue/opportunity. In conclusion, at this stage it is appropriate to flag a concern with higher growth scenarios, including in light of the consultation response received from the Environment Agency in 2023.

## 6.15 Appraisal summary

6.15.1 The table below present a summary of the appraisal of reasonable growth scenarios presented above. To reiterate, within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then **2**) categorise performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.<sup>26</sup>

N.B. the topics that together comprise the SA framework should not be assumed to have equal importance, or ‘weight’ in the decision-making process. As such, the intention is not for the appraisal matrix below to be used to arrive at a total performance score for each of the growth scenarios.

**Table 6.1: The reasonable growth scenarios – summary appraisal findings**

Topic	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
	(-) East SA	(-) Smalls	Preferred	(-) Smalls (+) SE SA	(-) Smalls (+) Exp NSA	(-) Smalls (+) SE SA (+) Exp NSA	(+) SE SA	(+) Exp NSA
Topic	Rank of preference (numbers) and categorisation of effects (shading)							
Accessibility	3	★	★	★	★	2	★	★
Air and wider env quality	2	★	★	★	★	2	★	★
Biodiversity	3	★	2	★	★	★	2	2
Climate adaptation	3	★	2	★	★	★	2	2
Climate mitigation	4	3	3	2	2	★	★	★
Communities & health	3	2	★	★	2	2	2	2
Economy & employment	2	★	★	★	★	★	★	★
Historic environment	2	2	★	2	2	3	2	2
Homes	4	4	2	3	3	2	★	★
Land, soils, resources	=	=	=	=	=	=	=	=
Landscape	2	3	★	2	2	3	2	2
Transport	4	3	2	★	3	4	2	2
Water	2	2	★	★	★	3	3	3

<sup>26</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

- 6.15.2 The summary appraisal matrix above shows a very **mixed picture**, serving to suggest that the choice between the RA growth scenarios is finely balanced. This is a strong indication of their ‘reasonableness’, in that all or most could arguably deliver on key objectives and their performance varies ‘at the margins’.
- 6.15.3 The first point to note is that **Scenario 1** stands out as performing quite poorly. However, it is difficult to categorically reach a conclusion that it is the worst performing scenario. This is because the appraisal is undertaken without any assumptions made regarding the ‘weight’ that should be attributed to each of the sustainability topics. Under three topic headings there are scenarios that perform worse than Scenario 1, and the Council, as decision-makers, might choose to give particular weight to one or more of these topics.
- 6.15.4 Maintaining a focus on Scenario 1, its poor performance partly reflects the absence of East St Albans (although there are some tensions/challenges in respect of comprehensive planning for the sector of land to the east of St Albans) but also the fact that this is a lower growth scenario (relative to the emerging preferred approach, which is Scenario 3). One of the assumptions underpinning the appraisal is that lower growth could create challenges in respect of progressing the Local Plan (with knock-on implications for sustainability objectives, as it would likely mean ongoing planning by appeal) and/or would risk unmet housing need being generated that then has to be provided for elsewhere within a constrained sub-region.
- 6.15.5 The appraisal serves to highlight **Scenario 2** as potentially a preferable lower growth scenario, which sees removal of non-strategic Green Belt allocation from lower tier settlements. A number of these sites are subject to a degree of constraint (with limited potential to avoid/mitigate impacts through masterplanning, relative to strategic sites); however, it is equally the case that a number are unconstrained, quite well located in transport terms (including close to an Abbey Line station), will deliver benefits (notably at Bricket Wood and Redbourn) and/or will help to meet locally arising housing needs (notably Wheathampstead).
- 6.15.6 A clear drawback to Scenario 2 is the risk or likelihood of generating unmet housing need, and there is a case for suggesting that it should be ranked lower under some topic headings on this basis; for example under the ‘Biodiversity’ heading, because St Albans does not stand out as biodiversity-constrained in the sub-regional context. However, in practice there would be the potential to adjust Scenario 2 by allocating certain of the better performing variable sites.
- 6.15.7 The next scenario for consideration is **Scenario 6**, which has the greatest number of predicted negative effects and also performs best or equal best under only four topic headings. The appraisal serves to suggest that the strategy here could amount to an over-concentration of growth at St Albans. However, there is a degree of uncertainty / the conclusion reached under several topic headings is precautionary.
- 6.15.8 Differentiating between the remaining five scenarios is then very challenging. Two key points to note are:
- **Scenarios 4 and 5** – could involve a problematic housing land supply trajectory, i.e. an overreliance on strategic sites could result in low housing delivery in the crucially important early years of the plan period.
  - **Scenarios 7 and 8** – are higher growth scenarios which gives rise to a notable (but uncertain) degree of concern in respect of water-related objectives.
- 6.15.9 These points potentially serve to highlight **Scenario 3** (the emerging preferred approach) as a scenario that strikes a good balance across competing sustainability objectives. It can be noted that Scenario 4 is found to perform better under more topic headings than Scenario 3 (8 versus 7), however, and to reiterate, the topic headings should not be assumed to have equal weight. Also, and in any case, Scenario 3 is predicted one additional positive effect and one fewer negative effect relative to Scenario 4.
- 6.15.10 Having made the above overarching comments, the following bullet points summarise appraisal findings under each of the sustainability topic headings in turn:
- **Accessibility (to community infrastructure)** – a clear focus of the strategy is directing growth broadly in line with the settlement hierarchy and in response to community infrastructure capacity issues and opportunities, most notably by supporting delivery of several new schools, including to address existing issues. However, opportunities could be missed under Scenario 1 and under Scenario 6 there would be a need for further work to consider long term secondary school capacity in St Albans itself.
  - **Air quality** – there is a transport and, in turn, air quality argument against the lower growth scenarios, recognising that the District does not stand-out as notably constrained in the sub-regional context. Having said this, there is an air quality management area (AQMA) in the centre of St Albans, hence a concern with Scenario 6 (albeit growth would be in the long term, and air quality is improving nationally).

- **Biodiversity** – there is not support for removing East St Albans, as this is a notably unconstrained site in biodiversity terms, but there is support for adjusting the emerging proposed approach in respect of small site allocations, as a number of the sites in question are subject to notable constraint.
- **Climate change adaptation** – there is not support for removing East St Albans, as this is a notably unconstrained site in flood risk terms, but there is support for adjusting the emerging proposed approach in respect of small site allocations, as a number of the sites in question are subject to notable constraint.
- **Climate change mitigation** – focusing on built environment decarbonisation, it is fair to flag a degree of support for higher growth scenarios, because of strong development viability locally (supportive of delivering net zero development to an exacting standard, including with net zero achieved onsite) and because there would be added support for strategic sites, which are typically associated with a particular opportunity. With regards to significant effects, the conclusion reflects the stretching nature of decarbonisation targets. It is not possible to conclude built environment decarbonisation has been a primary ‘driver’ of strategy and site selection (but transport decarbonisation has, as discussed below).
- **Communities and health** – it is inherently difficult to draw conclusions given many competing factors. However, on balance it is considered appropriate to flag: A) support for the emerging preferred approach, which aims to balance wide ranging factors; B) a degree of support for removing small sites, particularly those in the Chiswell Green, How Wood and Park Street / Frogmore area; and C) support for adding SE St Albans as it could feasibly deliver Gypsy and Traveller pitches, which is a key issue/opportunity.
- **Economy and employment** – the approach to allocating land for new employment floorspace – both industrial/logistics and R+D – is highly proactive under all scenarios. However, Scenario 1 is flagged as a lower growth scenario and one that could lead to issues in respect of secondary school capacity at St Albans. This is in the context of a need to support housing growth in the District to ensure a local workforce suited to the local employment opportunities, including in growth sectors linked to Herts IQ.
- **Historic environment** – concerns are overall fairly limited across the sites that are a variable across the growth scenarios, with the exception of expanded North St Albans, which is subject to notable constraint (albeit there is good potential to mitigate impacts through masterplanning). With regards to sites that are a ‘constant’, there are a range of issues (see Section 9), but overall limited concern.
- **Homes** – there is a need to factor-in not only total growth quantum, but also the mix of sites, particularly with a focus on minimising the need for a stepped requirement. Ensuring a good supply of smaller sites is very important from a housing perspective, and there is also a case to be made for the higher growth scenarios that could potentially (subject to consideration of an appropriate supply buffer) allow for the housing requirement to be set modestly above LHN as a response to levels of affordable housing need locally and/or in order to make modest provision for unmet need from elsewhere.
- **Land and soils** – the District is not associated with particularly high agricultural land quality in the sub-regional context, and it is difficult to differentiate between the variable site options with any confidence.
- **Landscape** – there is not support for removing either East St Albans or the package of small sites at lower tier settlements, from a landscape perspective. With regards to the two emerging strategic omission sites, both are subject to a degree of landscape constraint, and this appears to be particularly the case for expanded North St Albans (but SE St Albans is also sensitive given the need for a landscape gap to London Colney). However, the primary concern is recorded as allocating both sites, as it can be envisaged that there would be in combination effect resulting from strategic expansion of St Albans to the north, east and southeast (albeit the most sensitive landscape, to the west, would be protected).
- **Transport** – key factors are: A) there is not support for lower growth, nor for high growth at St Albans; B) there is a modest degree of support for removing smaller allocations at lower tier settlements; and C) there is a preference for SE St Albans over expanded North St Albans. With regards to significant effects, the ISA Report (2023) concluded a ‘moderate or uncertain positive effect’ for the preferred approach at that time, and there is now greater confidence in this conclusion in light of consultation responses received and ongoing work to explore transport issues and opportunities, including transport modelling work and detailed work to explore the potential for growth to deliver targeted enhancements to the District’s active travel network. However, it is not possible to predict ‘significant’ positive effects given ongoing work and because inherent challenges remain locally, given the densely populated nature of the south of the District (also noting recent sites unexpectedly gaining permission at appeal) and given inherent transport challenges at Harpenden (including noting likely future expansion of Luton Airport).
- **Water** – there is limited available evidence, but it is appropriate to flag a concern with higher growth scenarios, in light of the consultation response received from the Environment Agency in 2023.

## 7 The preferred approach

7.1.1 The aim here is to provide reasons for supporting the preferred scenarios in light of the appraisal of reasonable alternatives. The following text was provided to AECOM by SADC officers:

“The preferred scenario is **Scenario 3**, which the appraisal shows to perform reasonably well relative to the alternatives, clearly supporting a conclusion that it is “an appropriate strategy” (NPPF para 35).

With regards to St Albans itself, the Council is working with Oaklands College in respect of comprehensive planning for housing here alongside land for a secondary school, hence there is clear support for East St Albans. The next question is then whether to support a higher growth scenario involving an additional strategic urban extension. Were there to be a strategic case for this, then both of the shortlisted options would warrant consideration. However, there is very limited strategic case to be made, given the potential to provide for LHN in full without an additional strategic urban extension at St Albans, and also noting that neither site is associated with a clear case in respect of delivering on strategic transport or community infrastructure objectives.

A package of non-strategic allocations at lower tier settlements is then the other variable across the reasonable alternative growth scenarios (see Section 5 for the reasons for taking this approach). The appraisal does serve to highlight that several of these sites warrant ongoing consideration in terms of addressing onsite constraints and also in terms of achieving access and delivering on transport objectives more widely. However, the appraisal also serves to highlight a clear strategic argument against reducing supply from small sites in the sense that the effect of doing so would be to worsen the housing land supply situation in the important early years of the plan period. Also, a diverse mix of smaller sites is important in terms of ensuring a robust housing supply trajectory (i.e. a situation whereby there is confidence that the housing requirement can be delivered year-on-year).

In conclusion, Scenario 3 is considered to be justified, in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence (NPPF paragraph 35). It is noted that Scenario 3 gives rise to a degree of tension with certain sustainability objectives, as is inevitable in the context of a local plan, and it is recognised that there are certain arguments in favour of supporting an alternative approach, but Scenario 3 is judged to represent sustainable development on balance.”

## **Part 2: What are the appraisal findings at this stage?**

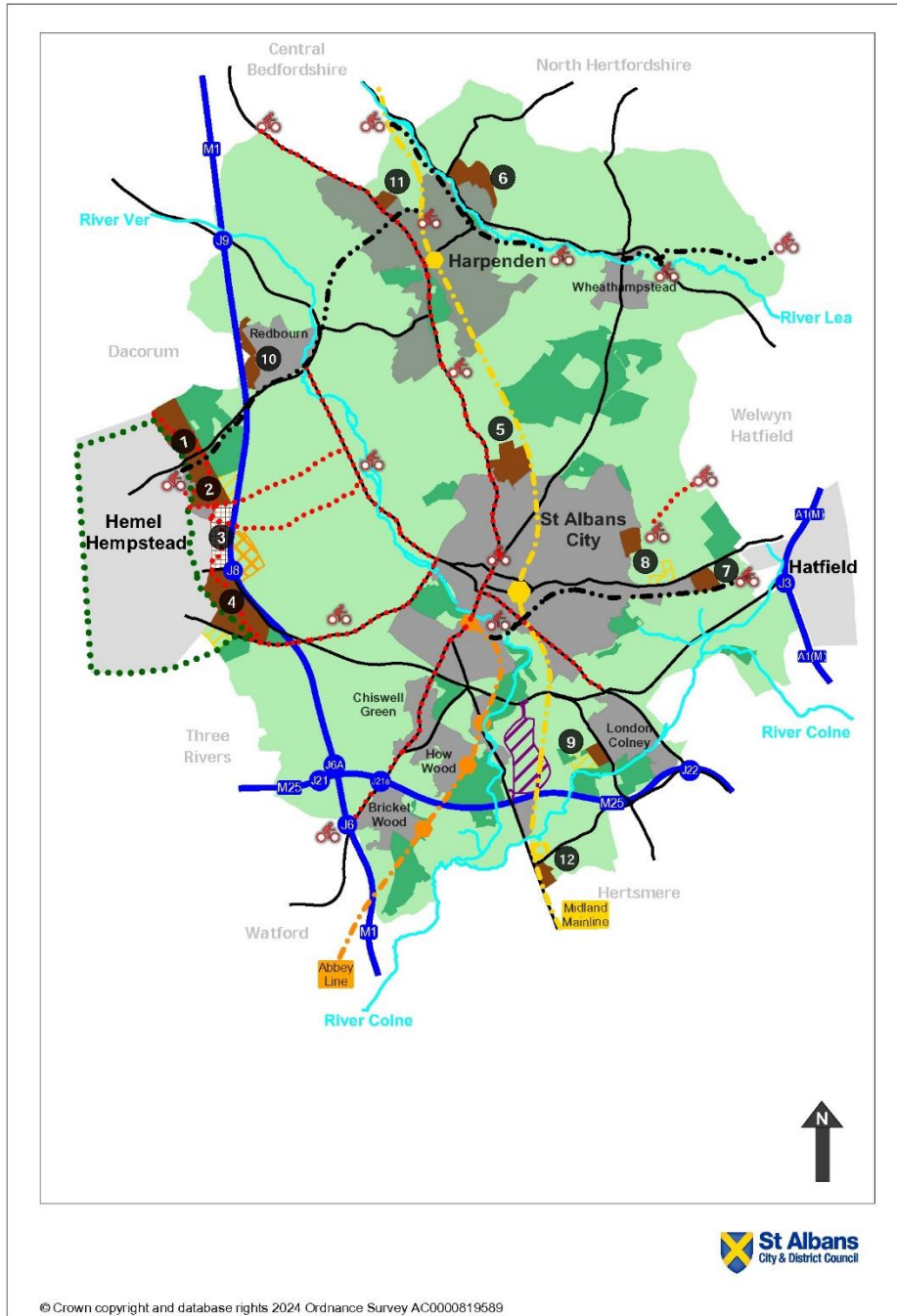
## 8 Introduction to Part 2

- 8.1.1 The aim of this part of the report is to present an appraisal of the Local Plan as a whole.
- 8.1.2 The appraisal builds upon the appraisal of **Growth Scenario 3** above, with added consideration given to:
- Site allocations that are a ‘constant’ across the growth scenarios; and
  - Development management policies.

### Appraisal methodology

- 8.1.3 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the Proposed Submission Local Plan, as a whole, before reaching an overall conclusion on significant effects.
- 8.1.4 Specifically, the regulatory requirement is to “identify, describe and evaluate” significant effects taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. effects can be short or long term, direct or indirect, and where:
- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan, under the presumption in favour of sustainable development and potentially Government intervention. Also, neighbouring local authorities would have to consider providing for St Albans’ unmet housing need.
  - The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. the District has a 2030 net zero target date, such that there is a need to achieve a rapid decarbonisation trajectory).
- 8.1.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the Draft Plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the Draft Plan will be implemented and the effect on particular ‘receptors’.
- 8.1.6 The appraisal aims to be systematic and to explain assumptions. However, there is also a need for conciseness and accessibility, for example noting that a Government Committee in 2022 [emphasised](#) a need to: “*streamline the current bureaucracy and overcomplication associated with... assessments.*”
- 8.1.7 In practice, there is a particular focus on the proposals set out within the ‘Spatial Strategy’ section of the Draft Plan, including the Key Diagram (see Figure 8.1, below) and as supported by Appendix I (which presents proposed allocations) and Appendix II (which presents the proposed housing supply trajectory).
- 8.1.8 This approach is also taken mindful that the Government’s Planning Practice Guidance (PPG) is clear that SA should focus on significant effects, which translates as a need to focus primarily on the merits of the proposed approach to land supply (allocations and broad locations; see NPPF paragraph 68) to meet objectively assessed needs and wider plan objectives. There is inherently relatively limited potential to predict significant effects for district-wide thematic policy, mindful that significance is defined in the context of the plan as a whole. Equally, it is the proposed approach to land supply / spatial strategy that generates overwhelmingly greatest interest amongst local residents and wider stakeholders.

Figure 8.1: The Key Diagram



	Green Belt		East Hemel Hempstead North		Glinwell, Hatfield Road		Harper Lane		Cycleways proposed Routes		Roads
	Settlements/ Urban Areas		East Hemel Hempstead Central		East St Albans		Significant Publicly Accessible Green Areas		Cycleways – Existing Routes		Motorways
	Adjoining Local Authorities Settlements		East Hemel Hempstead South		West Of London Colney		Strategic Rail Freight Interchange		Cycleways – HGC Circular		Rivers
	Broad Locations		North St Albans		West Redbourn		Hemel Garden Communities – Enterprise Zone		Railway – Abbey Line		Education Sites
	North Hemel Hempstead		North East Harpenden		North West Harpenden		M1 Junction 8 – Transport Improvements		Railway – Midland Mainline		



# 9 Appraisal of the Draft Plan

## 9.1 Introduction

9.1.1 Set out below is an appraisal of the Local Plan as a whole. The appraisal takes the form of 13 narrative discussions – one for each of the topic headings that together comprise the SA framework.

N.B. efforts are made to minimise repetition of text presented, hence the appraisal narratives presented below should be read alongside the appraisal of Scenario 3 in Section 6.

## 9.2 Accessibility (to community infrastructure)

9.2.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform very well, primarily due to a focus on directing growth broadly in line with the settlement hierarchy and in response to community infrastructure capacity issues and opportunities, most notably by supporting several new schools.

9.2.2 The scenarios that are a focus in section 6 vary in terms of two aspects of the proposed strategy:

- East St Albans – performs very well as it should be able to deliver / facilitate delivery of (henceforth 'deliver') a secondary school, a primary school and a local centre (plus other community infrastructure to be expected of any strategic allocation).
- Non-strategic allocations at lower tier settlements – a small number of the non-strategic sites are also supportive of community infrastructure objectives.

9.2.3 With regards to wider aspects of the proposed strategy (held constant across the scenarios in Section 6):

- **Hemel Garden Communities** – the St Albans components of HGC would likely deliver a new secondary school, two large primary schools and a range of other community, transport and green infrastructure, plus the effect would be to enable the Dacorum components of HGC to come forward, again with opportunities realised to deliver infrastructure alongside housing. HGC issues and opportunities clearly warrant ongoing detailed scrutiny, but there is confidence that the 'accessibility' benefits of a strategy including a focus at HGC far outweigh the benefits of alternatives involving much higher dispersal.
- **Other strategic allocations** – Table 3.1 within the plan document lists the strategic allocations in size order and clearly sets out what each will deliver (or facilitate delivery of) in addition to new homes. There is a clear correlation between scale and what can be delivered / achieved, with points to note as follows:
  - East St Albans – to reiterate is strongly supported in 'accessibility' terms.
  - West London Colney – is also notable for delivering a secondary school alongside a very modest number of new homes (324), which is a reflection of the County Council being the landowner.
  - West Redbourn – here there has been positive discussions with the landowners (the site is in multiple landownership, and a planning application has been submitted for part of the site, which is not an ideal situation in terms of securing comprehensive development with opportunities realised) such that there is now confidence that the site will deliver a new primary school (alongside 545 homes).
  - North St Albans and NE Harpenden – are the two largest strategic allocations other than HGC, and neither site is 'recommended' by the Green Belt Review (2023), such that there must close scrutiny of their potential to deliver infrastructure benefits. Neither site will deliver a secondary school, but there is no clear need for one at either location; also, NE Harpenden benefits from being located near-adjacent to a secondary school with capacity (indeed, one delivered only in recent years). Both sites will deliver a primary school and a local centre, as well as other targeted infrastructure benefits.
  - Glinwell (east of St Albans), NW Harpenden and Harper Lane (north of Radlett) are the remaining strategic allocations and are all smaller sites that will not deliver a new primary school or a local centre but will all deliver targeted infrastructure to the benefit of new residents and potentially also the existing community. Glinwell is the largest of the sites (484 homes) but is a previously developed site currently in commercial use, which has implications for development viability and, in turn, infrastructure delivery. At Harper Lane there is a need to closely consider school capacity, as discussed in Section 5, but otherwise the site benefits from reasonable accessibility to Radlett, where there is a very good offer.

- **Non-strategic allocations** – focusing on those at St Albans and Harpenden that are not a focus of the appraisal in Section 6 (and noting that all of these sites are discussed in Section 5.4):
  - St Albans – the two largest sites benefit from good proximity to the town centre, and another is very close to schools. The final site is then less well-located from an accessibility perspective, but now has planning permission. Finally, it should be noted that one of the sites comprises an Asset of Community Value (Bedmond Lane), but the proposal is to develop only part of the site.
  - Harpenden – a number of adjustments have been made to the package of non-strategic allocations, as discussed in Section 5.4, and these are supported from an accessibility perspective, as certain of the sites now removed from the plan are located a considerable distance from the town centre and train station. Also, the adjustments lead to reduced concern regarding ‘piecemeal’ expansion leading to pressure on services and facilities. Of the remaining ten non-strategic proposed allocations, one stands out as notably larger (Townsend Lane, 65 homes) and this site does benefit from relative proximity to the town centre (~1km) and schools are in very close proximity. Also, this is an example of a site where a detailed consultation response was received in 2023 setting out clear commitments.
- **Three Green Belt PDL sites** – one of these is located adjacent to HGC, and is discussed in Section 5.4, whilst the other two are existing commercial / industrial areas that are not well-located from an accessibility perspective. Also, both are in existing commercial use with implications for development viability and, in turn, the potential to mitigate concerns, e.g. via funding for new walking/cycling infrastructure. In particular, Smallford Works (~80 homes) is not well linked either to St Albans to the north (specifically the location of the proposed Glinwell strategic site) or London Colney to the south. There is a clear case for allocation, because it is anticipated that redevelopment for housing will be sought in the plan period and the Council would likely not be able to defend against an allocation given support for the redevelopment of PDL within the NPPF; however, there are clear accessibility drawbacks.
- **One urban greenfield site** – the site at London Colney has been used for allotments in the past but has been underused for at least ~15 years and benefits from being in close proximity to the village centre. Likely increased future demand for allotment space is a consideration, but it is also noted that there will likely be a boost to access to greenspace in the vicinity as a result of committed and proposed growth, including a new country park set to be delivered alongside the Government permitted SRFI.

A joint consultation response received from London Colney’s elected representatives in 2023 explained how there are “mixed views” about the merits of using urban greenspace for new homes instead of seeking to enhance the greenspace and support accessibility. The response also explained that: *“The past approach of SADC has made getting agreement with the landowners very difficult, as being amenable to accepting this as a planning site makes them reluctant to strike a deal that preserves the land for the agreed “recreational use”.* However, the situation has now moved on, with one of the two previously proposed allocations deleted from the plan, and it is this deleted site that is clearly the better suited for accessible greenspace out of the two (e.g. it is adjacent to a café; see Figure 5.14).

- **Urban PDL sites** – a number of new sites have been identified since the Regulation 18 stage, but the overall number of homes from these sites is only modestly increased (reflecting a precautionary approach regarding site capacities). One of the new sites is notably large and has excellent accessibility credentials, namely Harpenden Railway Station Car Park East (95 homes, which makes it much larger than all of the other sites bar Sainsburys St Albans, which is of a similar scale). Other points to note:
  - Two sites comprise churches and at one there is a requirement to “retain a community facility with at least the same floorspace.”
  - One site comprises a large supermarket and the requirement is to retain this “with a similar floorspace and retain a similar amount of parking, with the homes delivered through intensification of the site.”
  - Four sites comprise car parks (one a multistorey) within the St Albans Conservation Area. For each site there is a requirement for “a survey of car park usage before proceeding with any proposals.”
  - Existing use for car parking or garages is a consideration at the majority of the proposed urban brownfield sites. In this regard, there is a need to ensure that parking is not displaced to problematic locations, with implications for flow of traffic, bus services and safe walking/cycling.
- **In-combination impacts** – planning for secondary school capacity is a challenging issue locally, with a need to account for considerable uncertainties. The County Council commented in detail through the Regulation 18 consultation and were broadly supportive of the proposed strategy. In turn, there is clear merit in taking forward the strategy from Regulation 18 with only fairly modest adjustments.

9.2.4 Finally, with regards to proposed **development management policies**, numerous policies are broadly supported, from an accessibility perspective, and no policies stand-out as leading to a significant degree of tension with accessibility objectives. The following points are noted:

- Policy LG2 (Support for Transformation of Hemel Hempstead) – it is important to recognise that a stated aim of HGC is to support regeneration and, indeed, transformation of Hemel as a whole. The policy explains: *“Developers and promoters will work closely with the Councils... to develop a coordinated approach to growth and infrastructure and deliver the transformation of Hemel Hempstead. Contributions will be sought to deliver Key Projects and infrastructure on and off-site.”*
- St Albans city centre – a suite of three policies is proposed, which are largely unchanged from the Draft Local Plan stage (2023), with the main change being added reference to supporting “other markets and the environment of Market Square” in addition to the Charter Market.

The ISA Report (2023) suggested similar Harpenden town centre focused policy as a possibility, but this was not a request made by Harpenden Town Council through the consultation (ref 780), noting that there is an adopted Neighbourhood Plan which, amongst other things, includes a series of infrastructure zones associated with “specific infrastructure requirements should any future development take place”.

- Chapter 7 – of the plan presents a suite of policies dealing with ‘Community Infrastructure’. Most of the policies are fairly standard, but there is some local specificity, e.g. in respect of St Albans FC.

N.B. on the matter of ‘standard’ policies, it should be noted that National Development Management Policies are anticipated, although there is uncertainty on the timescale for their implementation.

- Policy TCR3 (Out-of-Centre Retail Parks) – supports the existing retail parks.

9.2.5 In conclusion, a **significant positive effect** is predicted on the baseline, accounting for both the spatial strategy and a suite of development management policies, and accounting for established objectives. Growth is distributed in line with the settlement hierarchy, and there is a strong focus on strategic sites (not only HGC) suited to delivering community infrastructure benefits.

9.2.6 This conclusion is unchanged from reached in 2023, at which time the conclusion was caveated with a call for “further work to understand more precisely what can be achieved”. In this regard, much was learned through the consultation in 2023, for example from the County Council’s detailed response, and work has also been ongoing since, including via HGC workstreams and discussions with site promoters. There is a clear case for keeping up momentum by progressing the plan without major adjustments.

## 9.3 Air and wider environmental quality

9.3.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform broadly well relative to alternatives that would involve lower growth or an increased focus of growth at St Albans itself. There is little reason to suggest that the proposed growth strategy gives rise to any significant concerns in respect of worsened air quality within existing problem areas, or otherwise generation of problematic air quality.

9.3.2 With regards to aspects of the spatial strategy that are held constant across the scenarios in Section 6:

- **Hemel Garden Communities** – there are two AQMAs at Hemel Hempstead, but these are relatively distant from HGC (associated with north-south road corridors close to the western edge of the town). HGC is considered to be associated with a considerable opportunity in respect of masterplanning in support of trip internalisation and modal shift away from the private car (albeit this remains a focus of ongoing work), plus the A414 strategy / HERT represents a considerable opportunity to address air quality hotspots across the sub-region (for example, Hertford is constrained). However, benefits would be felt in the long term, and air quality concerns are decreasing nationally over time (albeit concerns will remain, particularly in respect of particulates from roads, brakes and tires given the weight of EVs).
- **Other strategic allocations** – North St Albans is beyond easy walking distance of the town centre and train station but is located on good bus route (and East St Albans is near a good bus route; indeed, these are the two key routes locally) and there are opportunities for upgrades to cycling infrastructure. West of London Colney is in good proximity to the local centre and schools, plus delivering a new secondary school will help to reduce the distance that students need to travel to school and, in turn, help with peak time traffic congestion (although there are concerns around school traffic affecting London Colney). A benefit of NE Harpenden is its proximity to a recently delivered secondary school, although school traffic in combination with traffic relating to housing growth is a matter for further consideration.

- **Non-strategic allocations at St Albans and Harpenden** – the appraisal in 2023 stated: “*a number of the proposed urban extensions are beyond easy walking distance of a town / village centre and/or distant from bus corridors... Allocation options at the southern edge of Harpenden potentially stand-out in this regard, as does the proposed allocation at Gustard Wood....*” However, the situation has improved with deletion of a series of previously proposed non-strategic sites, including the site at Gustard Wood.
- **In-combination impacts** – a further consideration is cumulative effects at the scale of St Albans (where there is an AQMA) and potentially Harpenden (no AQMA but concerns around traffic congestion). However, there is no basis to conclude any significant concerns, including given the timetable for growth.
- **Three Green Belt PDL sites** – these sites all give rise to an element of concern in transport and accessibility terms, as has been discussed, but there is no reason to suggest an air quality concern. Also, one of the sites is located adjacent to the A414, which is a busy dual carriageway, and there is currently uncertainty how new homes will be configured within the site (noting existing commercial land).
- **Urban PDL sites** – there are some potential challenges relating to the St Albans AQMA, for example London Road Car Park (36 homes), which is adjacent to the AQMA. The site is in a highly accessible location (adjacent to the high street), but currently comprises car parking, such that site specific policy requires “a survey of car park usage before proceeding with any proposals.” This is important from a perspective of avoiding problematic on street parking, with implication for traffic movement and walking/cycling. Also, the site is within the St Albans Conservation Area, which could constrain the potential to deliver new car parking and/or other transport infrastructure.

Another consideration is development of PDL sites adjacent to main roads, railways or other sources of noise and potentially air pollution, e.g. land historically seen as appropriate for car parking. However, equally there is a clear case for maximising urban growth from a transport and accessibility perspective and, in turn, from an air quality perspective. In total there are five sites adjacent to a railway line, but it is not clear that there are any significant concerns (including noting that one of the sites is adjacent to the Abbey Line, where noise pollution is much lower relative to the main line). It is also noted that two of the sites are adjacent to a station, where there is clearly a very strong case for maximising growth.

**N.B.** further discussion of transport issues / opportunities is presented below under ‘Transport’.

#### 9.3.3 Finally, with regards to proposed **development management policies**:

- Beginning with site specific policy an assessment to consider air, noise or other specified health / safety / amenity considerations is a requirement for ~16 of the proposed allocations in total. The most significant requirement is proposed for the West Redbourn strategic allocation:

*“A noise assessment must be carried out regarding the M1... and appropriate mitigating measures provided... which may include setback of residential units, planting, and acoustic bunding/ fencing.”*

- Policy HW1 (Noise and Air Pollution) is the primary policy of note. It is a fairly standard policy; however, there is a degree of local specificity in respect of noise pollution, with the supporting text explaining: “*The DEFRA England Noise and Air Quality Viewer online shows three large noise corridors affecting the District: the M1, A1 and M25.*” There are also other significant sources of noise pollution locally.
- It is not clear that any other proposed thematic policies give rise to a significant degree of tension with air quality objectives. There can be a degree of tension between air quality objectives, on the one hand, and objectives around ensuring high degrees of air tightness within developments (with a view to energy efficiency, i.e. taking a ‘fabric first’ approach to built environment decarbonisation) on the other. However, there is the potential to mitigate concerns through good ventilation, and none of the proposed policies within the Climate Change section of the plan give rise to any particular concern in this respect.

#### 9.3.4 In conclusion, a broadly **neutral effect** is predicted on the baseline, as per the conclusion in 2023. There is little reason to suggest that the proposed growth strategy will conflict with air quality objectives, particularly noting the location of AQMAs within the District and in surrounding areas. HGC is supported, but there is inherently an element of uncertainty and risk around achieving the high levels of modal shift (away from use of the private car) that are being assumed for the purposes of traffic modelling.

## 9.4 Biodiversity

9.4.1 The appraisal in **Section 6** does not conclude any significant concerns with the proposed spatial strategy but identifies a preference for those alternatives appraised that remove support for non-strategic urban extensions at lower tier settlements, as several are somewhat constrained in biodiversity terms. With regards to East St Albans, there are few biodiversity concerns assuming no further development creep.

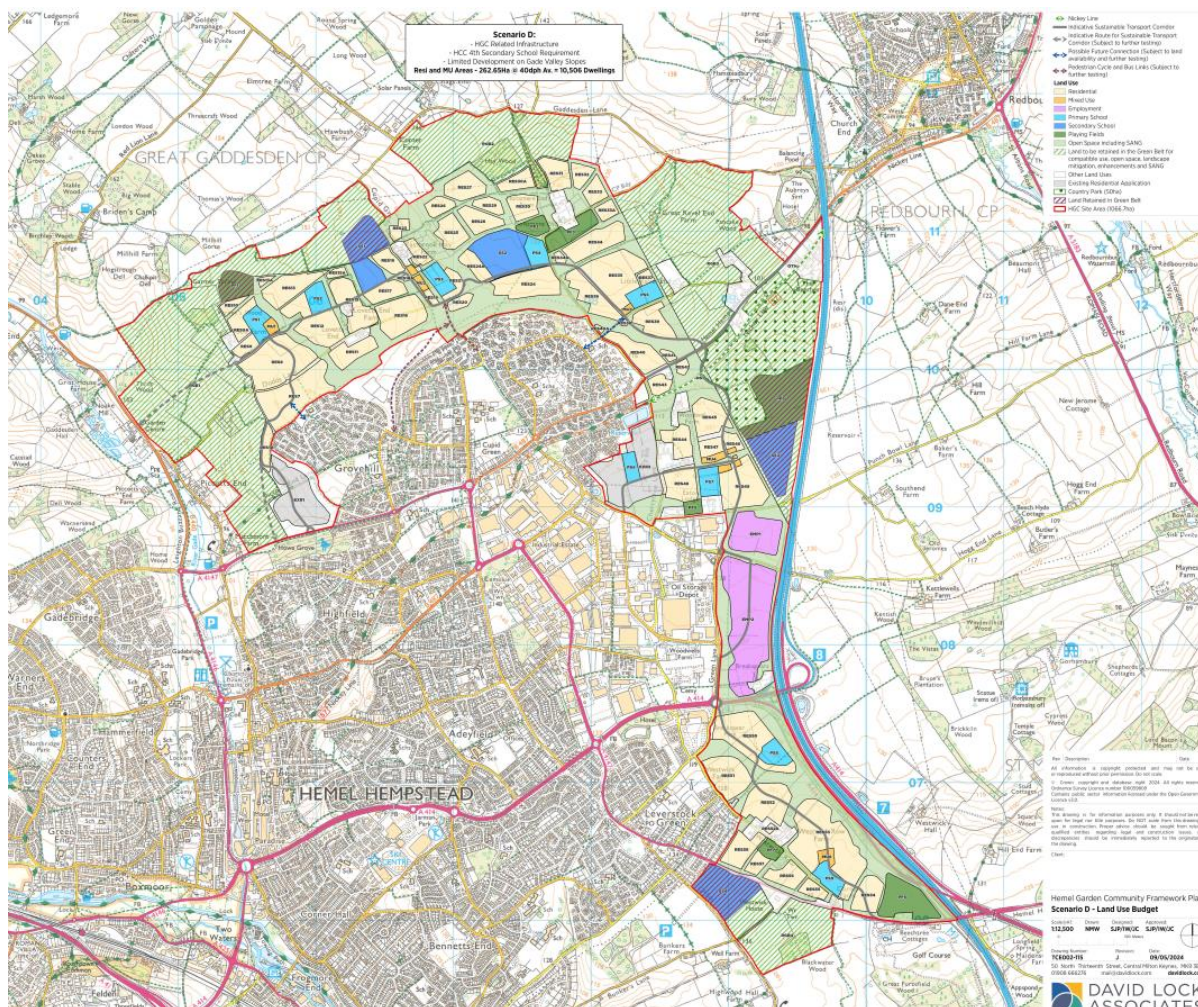
9.4.2 With regards to aspects of the spatial strategy that are held constant across the scenarios in Section 6:

- Hemel Garden Communities** – there is a headline constraint in the form of recreational pressure on Ashridge Woods and Commons SSSI component of Chilterns Beechwoods SAC. However, there is confidence in the ability to suitably mitigate concerns through delivery of extensive and high quality new Strategic Alternative Natural Greenspace (SANG). A concept plan for HGC showing areas of SANG has already been shown in Section 5, but Figure 9.1 shows things in a slightly different way, specifically differentiating between: A) ‘open space including SANG’ between development parcels; B) outer ‘land to be retained in the Green Belt’ to include SANG; and C) a large country park. It can be seen that this is Scenario D, with a total of four scenarios having been explored.

Furthermore, there is a need to recognise that without the St Albans component of HGC the Dacorum component could well prove undeliverable, leading to greatly increased pressure for growth elsewhere in Dacorum, including at constrained locations (both Berkhamsted and Tring are constrained, both by proximity to Ashridge and more widely) and at smaller sites less well-suited to delivering strategic SANG.

Finally, it is important to recognise that HGC is notably unconstrained by onsite, adjacent or nearby biodiversity designations or priority habitat. For example, there is a low density of Local Wildlife Sites (LWS) in the vicinity of HGC relative to other parts of the District. Similarly, the area is not particularly sensitive in terms of historic field boundaries, although there is some variability, e.g. there appears to be a concentration of more significant field boundaries to the east of Cherry Tree Lane (also to the west).

**Figure 9.1: Emerging preferred land use budget for HGC (Source: HGC Framework Plan Evidence Base)**



- **Other strategic allocations** (i.e. all other than East St Albans, which is discussed in Section 6):

- NW Harpenden and West London Colney – give rise to limited biodiversity concerns. In the case of the former, there are sensitive boundaries on all sides (including noting LWS woodlands to the east) but there is little reason to suggest that securing access / achieving transport objectives would result in a problematic impact. In the case of the latter, there is a considerable opportunity to deliver strategic green/blue infrastructure enhancements in the vicinity, linking with SFRI country parks and the River Colne corridor, and supporting walking/cycling links to the west and southwest.
- West Redbourn – is also subject to limited biodiversity constraint in terms of onsite and nearby habitats. However, new residents will need to have access to Suitable Alternative Natural Greenspace (SANG) to avoid an increase in recreational pressure on the Chilterns Beechwoods SAC, as per HGC. In this regard, there is good confidence regarding access to SANG with capacity, with the following explanation presenting within the Habitats Regulations Assessment (HRA) Report (2024):
 

*“At the time of writing (August 2024), a planning application has been submitted to the Council for the southern portion of allocation B3 to deliver 300 dwellings (allocation is for 545 dwellings) (application number 5/2021/3631). The potential SANG for this site is located within Dacorum. It is located circa 1700m west of the allocation site, joined by Gaddesden Lane, and the applicants have submitted an application to Dacorum Council for a change of use to SANG for the proposed SANG site. It is possible that this application will not be decided for several months; however, the advanced nature of this application demonstrates the applicant’s intention to provide SANG for this development.”*
- Glinwell (east of St Albans) – as a brownfield site there are limited concerns. However, the western ~1/4 of the site comprises a LWS associated with Butterwick Brook. It will be important to consider delivering extensive green/blue infrastructure in this area, and there is a clear opportunity to link priority habitat to the north and south, which might be referenced in site-specific policy.
- Harper Lane (north of Radlett) – gives rise to limited concerns, including as the site partly comprises brownfield land. There is priority habitat along Harper Lane (which links to priority habitat along the railway), but there is little reason to assume a need for road upgrades that would result in an impact. Also, there is a woodland complex to the east, including a large ancient woodland that appears to be inaccessible to the public, hence growth in this area could feasibly support improved accessibility.
- North St Albans – the southern extent is notably constrained by Long Spring LWS (ancient woodland), which is associated with a public footpath and potentially serves a role in terms of functional connectivity between habitat patches at a landscape scale. Also, Sandridgebury Lane cuts through the site, which is associated with historic hedges. On the other hand, growth here would be in close proximity to Heartwood Forest, such that it could potentially contribute to targeted enhancements.
- NE Harpenden – whilst there is no onsite priority habitat onsite, there are notable LWSs adjacent, which are seemingly associated with historic areas of common land on raised ground (see [historic mapping](#)). Indeed, land within the site is shown as common land on some historic mapping. The primary concern is likely the notable density of mature historic field boundaries within the east / southeast part of the site, which link strongly to two LWSs near adjacent to the east. The potential for impacts to these field boundaries can be envisaged given masterplan options (see Section 5.4). On the other hand, with regards to the common land LWS located on raised ground to the northeast of the site, the potential for biodiversity and accessibility focused enhancements might be explored.

- **Non-strategic allocations at St Albans and Harpenden** – key considerations are:

- Bedmond Lane, St Albans (70 homes) – is sensitive in biodiversity terms (albeit not a designated LWS), as discussed in Section 5.4. Proposed site specific policy states: *“Proposals must take account of the presence of the Lizard Orchid which is a protected species on Schedule 8 of the Wildlife and Countryside Act 1981.* Further requirements could be considered, subject to available evidence.
- North East of Austen Way, St Albans (37 homes) – is adjacent to an ancient woodland LWS and includes significant onsite mature vegetation / woodland. On much of the site this has mostly developed over the past ~20 years, as shown by historic satellite imagery, but in the western part of the site this is the remnant eastern edge of Winche’s wood, as shown on [historic mapping](#). It could potentially be that this was an ancient woodland, although the nationally available dataset does not indicate it as such. The site as a whole is 3.3 ha, hence there should be good potential for targeted onsite greenspace, and the sensitivities are referenced in site specific policy. The possibility of adding reference to measures aimed at ensuring habitat connectivity could be considered, but equally it is not clear what implications this would have for wider masterplanning objectives.

– Harpenden – the proposed non-strategic allocations are most subject to limited biodiversity constraint. There is a modest concentration at the eastern edge of the town, where there is quite a high density of priority habitat (shown clearly on [historic mapping](#)), linked to the River Lee corridor, but concerns are somewhat reduced following deletion of one allocation relative to the Draft Plan stage (2023).

- **Urban PDL sites** – give rise to limited biodiversity concerns overall, but it is noted that three sites are constrained by TPOs, and this notably includes the largest proposed site, namely Harpenden train station carpark (east). Here there is an area TPO running along the entire boundary of the site, which could well serve as a constraint to development.

- **In-combination impacts** – the primary in-combination consideration is recreational pressure on the Chilterns Beechwoods SAC resulting from growth in the west of the District. The HRA Report concludes:

*“Whilst not all allocations have a SANG strategy identified, those without a SANG solution in place are not to be occupied until at least year 6 of the Local Plan. The Council has confirmed that they are confident that appropriate SANG solutions will be delivered for all of the relevant sites... This confidence is in part demonstrated by the Council’s commitment to the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council’s Policy Committee March 2023. It is considered that with the Chilterns Beechwood SAC Mitigation Strategy in place, and the Council’s confidence to deliver SANG in a timely fashion, (acknowledging the excess SANG capacity at the Hemel Garden Community), that no adverse effects on the integrity of the Chilterns Beechwoods SAC would result.”*

**Box 9.1: Overview of the Chiltern Beechwoods SAC recreational pressure issue**

An assessment by Dacorum Borough Council in 2022 revealed that more action is needed to help protect two components of the Chilterns Beechwoods SAC from increasing visitor pressure, including Ashridge Commons and Woods Site of Special Scientific Interest (SSSI). If nothing is done, new development will lead to further visitor pressures and damage to the integrity of the SAC.

A buffer of 12.6km around the Ashridge Commons and Woodlands was defined, which takes in the western part of St Albans District. Within this buffer zone the Council was unable to issue decisions on planning applications for new development for a number of months, ahead of a recreational pressure Mitigation Strategy being agreed.

A Mitigation Strategy was then agreed in late 2022 and must now be implemented. Implementation of the Mitigation Strategy has two key implications for housing growth in the western part of St Albans District:

- Suitable Alternative Natural Greenspace (SANG) – must be delivered alongside new development, with a view to providing an alternative to visiting the Ashridge Commons and Woods. All new developments within the 12.6km zone will need to make provision for sufficient SANG, or alternatively contribute towards a suitable ‘strategic’ SANG elsewhere. This has implications for development viability (albeit development viability locally is strong) and also means that St Albans District must liaise closely with Dacorum Borough in respect of how to bring forward strategic SANG, most notably in respect of SANG to mitigate HGC.
- Strategic Access Management and Monitoring (SAMMS) – the National Trust has identified a package of measures that will cost a total of £18.2million. This cost will be shared across all of the affected local authorities. In St Albans, this means that developers will be required to pay a tariff of £829 per dwelling.

9.4.3 Finally, with regards to proposed **development management policies**:

- Policy NEB6 (Biodiversity) – whilst the majority of the policy reflects limited local specificity (in the context of likely forthcoming National Development Management Policies), a key decision is taken to support the national minimum standard of 10% biodiversity net gain, as opposed to seeking a higher standard. A number of recently adopted local plans set a requirement for 20%, for example the [Guildford Local Plan Part 2](#); however, there is increasingly scrutiny of the potential drawbacks for development viability and delivery more generally, recognising the potential for administrative burden, particularly if there is a lack of readily available local biodiversity credits (also accounting for habitat types) that can be purchased by developers where it is the case that the requisite BNG cannot be achieved onsite. In turn, there is increasingly an emphasis on undertaking detailed evidence work as part of plan-making in order to justify 20% BNG, which takes time and resources. For example, evidence studies have recently been published alongside the Regulation 19 local plans for [Uttlesford](#) and [Surrey Heath](#). Ultimately, whilst 20% BNG is supported from a biodiversity perspective, and there could also be wider benefits in terms of recreational opportunity and other ‘ecosystem services’, there can be risks and drawbacks for development viability and delivery, particularly in the absence of detailed evidence base work. There could be potential to revisit this matter guided by the [Hertfordshire Local Nature Recovery Strategy](#).

- Policy LG3 (Hemel Garden Communities Place Principles) – presents “a Green Network” as the first of four key pillars, which is supported, from a biodiversity perspective. In 2023 the ISA Report recommended that requirements should be more spatially and scheme specific (i.e. less generic) and this has been partly actioned, including with a new requirement to achieve > 10% BNG. Whilst work on BNG is yet to be completed, there could well be good potential for high BNG, given that the site includes limited priority habitat. Focusing on the northern component of HGC (land both within St Albans and Dacorum), it will be important to consider BNG at the landscape scale (as opposed to focusing only on the site red line boundary), noting the density of small woodland patches, including ancient woodland, associated with raised ground to the north, and also noting that there is one small area of ancient woodland at the northern edge of Hemel Hempstead / southern edge of HGC (within Dacorum District).
- No DM policies can be identified with significant negative implications for biodiversity objectives.

9.4.4 In conclusion, a broadly **neutral effect** is predicted on the baseline, accounting for established objectives. There is a case for predicting positive effects given: certain site-specific opportunities, growth broadly directed in support of two key opportunity areas, namely Heartwood Forest and the series of country parks set to be delivered alongside the Government permitted SRFI; and support for HGC, which is subject to limited constraint (assuming effective SANG) such that it is supported in biodiversity terms (as it will take the pressure of more sensitive areas). However, a number of the proposed non-strategic allocations are subject to significant onsite or adjacent constraint (primarily locally designated habitat or non-designated priority habitat), and there are also some notable constraints affecting two of the strategic urban extensions, namely North St Albans and NE Harpenden (but strategic sites give rise to a good opportunity to avoid and mitigate impacts through masterplanning etc). Also, growth could potentially be directed with a clearer focus on realising strategic green / blue infrastructure opportunities (e.g. river corridors).

9.4.5 The following recommendation from the ISA Report (2023) has been partially addressed: “Assumed yields have been defined to reflect onsite constraints; however, in several instances, there is a need for further work / evidence to demonstrate that an appropriate balance is being struck between making best use of the site... versus leaving parts of sites undeveloped as greenspace...” However, there remains the potential to add detail/specificity to site-specific policies. Finally, the proposal is to require only the national minimum 10% biodiversity net gain (BNG), but it is recognised that requiring higher BNG would require detailed evidence base work and would have viability implications. The time to revisit requirements in respect of BNG could be following the Hertfordshire Local Nature Recovery Strategy (LNRS).

## 9.5 Climate change adaptation

9.5.1 The appraisal in **Section 6** does not conclude any significant concerns with the proposed spatial strategy but identifies a preference for those alternatives appraised that remove support for non-strategic urban extensions at lower tier settlements, as several are somewhat constrained by flood risk. East Redbourn, in particular, is closely associated with the River Ver, but homes would be outside the flood risk zone.

9.5.2 With regards to aspects of the spatial strategy that are held constant across the scenarios in Section 6:

- **Hemel Garden Communities** – is primarily associated with raised land between the rivers Ver and Gade and, in turn, is associated with limited flood risk, plus as a large strategic site it is fair to assume high quality sustainable drainage as part of masterplanning and urban design. Three surface water flood channels pass west to east through the area (with water flowing towards the Ver), which, it is fair to assume, would be effectively integrated as part of a green / blue infrastructure strategy.
- **Other strategic allocations** (i.e. all other than East St Albans, which is discussed in Section 6) – NW Harpenden potentially stands out as more constrained because there is a very strong surface water flood risk channel associated with the A1081 Luton Road (a dry valley), and it is noted that numerous properties intersect this surface water flow path downstream. However, on the other hand, it is difficult to suggest any significant concerns given that there is typically ample opportunity to avoid surface water flood risk through masterplanning and high quality Sustainable Drainage Systems (SuDS).

Similarly, both NE Harpenden and West Redbourn are subject to an element of constraint on account of adjacent flood risk zones (fluvial flood risk in the former case, surface water in the latter). A surface water flood zone does also pass through the eastern part of NE Harpenden, and avoiding development within zone could prove to be challenging; however, the nationally available dataset suggests that the zone is primarily associated with the lowest category of surface water flood risk (1 in 1,000 years).



- **Non-strategic allocations at St Albans and Harpenden** – two sites are of note. Firstly, Lower Luton Road, Harpenden, is adjacent to the River Lee flood risk zone, but there will clearly be good potential to avoid and buffer the flood zone, i.e. it is difficult to envisage the flood risk zone proving to be a significant constraint to effective masterplanning. Secondly, Verulam Golf Club, St Albans, significantly intersects a surface water flood zone, and the site promoters concept plan (Figure 5.9) shows this part of the site in use for car parking and access, hence this is potentially a matter for further consideration.

N.B. there is support for removing Harpenden STW, which was flagged in 2023 as subject to flood risk.

9.5.3 With regards to the collection of proposed **urban PDL sites**, whilst there can be a tendency nationally to develop urban brownfield sites in flood zones that have historically been seen as appropriate for a low intensity use such as a car park, there appear to be few if any such concerns locally. St Albans city centre is associated with raised ground, and whilst Harpenden town centre is associated with a valley, it does not appear to be the case that any of the proposed urban allocations are significantly constrained.

9.5.4 Finally, with regards to proposed **development management policies**:

- Strategic Policy SP2 (Responding to the Climate Emergency) – includes a strong focus on climate change adaptation / resilience as well as climate change mitigation / decarbonisation.
- Policy NEB8 (Managing Flood Risk) – is the primary policy of note. It has been updated to reflect comments received from the Environment Agency (ref. 426), but it remains the case that there is little if any local specificity. It is noted, however, that there is also tailored policy on Blue Infrastructure (NEB5) and also that the policy on Major Transport Schemes (TRA2) references flood risk (this can be a key issue, with roads often focused along river corridors). The ISA Report stated: “*Strategic flood storage aimed at reducing downstream flood risk is feasibly something to consider further (the EA may wish to comment through the consultation).*” However, it is not clear that there are any significant opportunities.

9.5.5 In conclusion, whilst the appraisal in 2023 flagged the risk of a negative effect, at this stage it is possible to conclude a **neutral effect** on the baseline, given consultation on detailed site-specific proposals in 2023 and subsequent Level 2 Strategic Flood Risk Assessment (SFRA). Several sites are subject to a degree of flood risk constraint, but flood risk is overall not a major constraint to growth locally, and there will be good potential to avoid or mitigate flood risk in practice, most notably by retaining land as green space.

## 9.6 Climate change mitigation

9.6.1 The appraisal in **Section 6** flags a concern with all of the growth scenarios appraised, reflecting the urgency of achieving decarbonisation (N.B. the focus here is on built environment decarbonisation), and also flags a preference for higher growth scenarios (given very strong development viability) and scenarios with an additional emphasis on strategic sites (which can tend to be well suited to net zero development).

9.6.2 With regards to aspects of the spatial strategy that are held constant across the scenarios in Section 6:

- **Hemel Garden Communities** – is likely to represent a key decarbonisation opportunity, in terms of minimising per capita greenhouse emissions from the built environment (plus there are transport decarbonisation opportunities), albeit there are many competing objectives with major cost implications, including in respect of infrastructure delivery and Chilterns Beechwoods SAC mitigation.

The opportunity will primarily relate to achieving standards of operational emissions beyond the standards required through Building Regulations and ideally going as far as achieving ‘onsite net zero development’ (i.e. net zero emissions without resorting to offsetting) with net zero achieved in line with the energy hierarchy (‘fabric first’) and calculated using a best practice methodology (see Box 6.1). As part of this: there could be particular opportunities around rooftop solar;<sup>27</sup> masterplanning options aimed at making the most of large-scale battery storage should be explored; and proportionate work to consider the feasibility of a heat network might also be appropriate (but heat networks are challenging to deliver and typically require high density mixed use development and/or a source of ambient or waste heat).

However, there could well also be an opportunity to minimise non-operational emissions, which primarily translates as the embodied carbon in construction materials and the emissions associated with construction and demolition (also upkeep and necessary changes to a building over its lifetime).

<sup>27</sup> There is an established opportunity to deliver extensive rooftop solar as part of the strategic employment scheme at HGC, and it is assumed this would likely serve the local area directly, as opposed to feeding into the national grid.

One key means of minimising non-operational emissions is support for modern methods of construction (MMC), which is a broad concept, but one which invariably includes a focus on realising opportunities for offsite modular construction. The Hertfordshire Growth Board is seeking to place the County at the forefront of “[offsite manufacture](#)” nationally, building on Hertfordshire’s heritage as a “cradle for continuous experiment in the making of cities” and recognising that Hertfordshire is home to the BRE (Building Research Establishment) and forms part of the Hertfordshire Innovation Quarter. It could well be the case that allocation of strategic growth locations within St Albans, to include HGC, and in combination with strategic growth locations elsewhere in the sub-region (including Harlow and Gilston Garden Town), helps with building a business case for a sub-regional MMC facility.

- **Other strategic allocations** (i.e. all other than East St Albans, which is discussed in Section 6) –could potentially be associated with a degree of built environment decarbonisation opportunity, relative to non-strategic urban extensions. However, there is considerable uncertainty, with it generally being the case, across all the allocations, that there is a need for further work, including by site promoters, to demonstrate the extent to which there is a particular site or concept-specific decarbonisation opportunity. It is crucially important that built environment decarbonisation opportunities are realised through spatial strategy / site selection, given the District’s 2030 net zero target, which is extremely stretching.
- **Non-strategic allocations at St Albans and Harpenden** – one consideration is strong development viability at Harpenden, such that there is support for maximising growth via small sites (given limited scope for strategic urban extensions). However, it is also noted that two of the larger non-strategic sites at Harpenden fall within the Chilterns Beechwood SAC zone of influence (with cost implications).
- **Urban PDL sites** – high density mixed used development can give rise to an opportunity to deliver heat network (i.e. heat pumps fed by a communal source of waste or ambient heat), and there can be a particular opportunity where redevelopment is concentrated and coordinated in a particular area (e.g. a town centre), but heat networks are technically challenging and costly to deliver, and it is not clear that there are any particular opportunities locally. It can also be the case that urban brownfield sites are associated with challenging development viability that restricts the potential to deliver low carbon / net zero focused measures, plus there is a need to consider the urban heat island effect and risk of overheating during future heat waves (such that designing-in shading is a key consideration).

#### 9.6.3 Finally, with regards to proposed **development management policies**:

- Strategic Policy SP2 (Responding to the Climate Emergency) – is very prominent within the Local Plan, which is supported. However, the policy is somewhat high-level, such that it is difficult to be sufficiently confident regarding the significance of the effect that it will have when applied to planning applications.
- Policy CE1 (Promoting Sustainable Design, Construction and Building Efficiency) – must give effect to Policy SP2, ensuring a suitably ambitious approach to built environment decarbonisation that is reflective of high development viability locally and the 2030 net zero target. The policy is more high level than at the 2023 Draft Local Plan stage, but this does not give rise to major concerns as text removed from the policy is retained in supporting text.

The potential for local plans to require net zero development (in terms of operational emissions), with a preference for onsite net zero if at all possible (i.e. without resorting to offsetting), is currently a live matter of debate nationally as discussed in Section 6, and as was discussed in the ISA Report (2023). A high proportion of emerging local plans include detailed requirements in respect of achieving net zero development to an exacting standard (e.g. [Uttlesford](#) and [Winchester](#)). However, any such policy necessitates considerable evidence-gathering (Uttlesford, for example, draws upon extensive work undertaken by [Essex County Council](#)), and any such work must be undertaken in the context of considerable uncertainty regarding national policy (in respect of local built environment decarbonisation requirements that go beyond those set out in the Building Regulations, in the context of a need to ensure a nationally consistent policy environment). Also, any requirement for net zero development impacts development viability, with knock on implications, e.g. for affordable housing. In this light, a preferable time for revisiting local policy could be once there is clarity on national policy, notwithstanding the fact that decarbonisation is clearly a national and local priority.

- Strategic Policy SP1 (Spatial Strategy) – at the Draft Local Plan stage (2023) stated support for “*renewable energy provision, including large scale solar power generation at East Hemel...*” This has now been deleted, but there is still a reference in site-specific policy. As discussed, the key consideration moving forward is the potential for HGC to deliver net zero development to an exacting standard.

- Policy LG1 (Broad locations) – requires “excellence in... energy efficiency” which is supported. A focus on energy efficiency (‘fabric first’) will mean a good focus on the energy hierarchy, which is supported, but there is also a need to consider whether the outcome will be net zero development having also accounted for onsite renewable energy generation (and potentially also carbon offsetting).
- Policy LG3 (Hemel Garden Communities Place Principles) – the ISA Report (2023) commended the following requirement: “*A fabric first approach contributing towards the delivery of net zero homes.*” This statement has been removed, which is understandable in light current national policy uncertainty, but it is understood that there remains potential to achieve net zero development, subject to further work.

9.6.4 In conclusion, there is a strong case for growth locally given development viability, and there is a good focus on strategic sites, which are often well suited to achieving net zero development to an exacting standard. However, it is difficult to conclude that built environment decarbonisation has been a major focus of spatial strategy, site selection or masterplanning, and proposed DM policy is high level (partially reflecting the current national policy environment and given the potential to supplement through an SPD).

9.6.5 On balance, whilst the appraisal in Section 6 flags the risk of a negative effect, here it is considered appropriate to conclude a **neutral effect**. The conclusion as per that reached in 2023, and it should be noted that built environment decarbonisation was not a main focus of the recent consultation. Also, it is important to recognise that whilst the plan could be stronger in terms of built environment decarbonisation (the focus here) it does perform well in terms of transport decarbonisation (discussed further below).

9.6.6 It is recognised that there is an argument for predicting a negative effect having accounted for established objectives and targets, in particular accounting for the District’s ambition of achieving net zero by 2030.

## 9.7 Communities and health

9.7.1 The appraisal in **Section 6** focuses specifically on: A) providing for Gypsy and Traveller accommodation needs; and B) addressing community concerns with growth, as understood from the Draft Local Plan consultation (2023). The appraisal concludes a good degree of support for the proposed spatial strategy.

9.7.2 The appraisal here is an opportunity to consider a broader range of spatial strategy-related issues and opportunities. In order to do so effectively the discussion is presented below under thematic headings:

- **Place-making, high quality design and beauty** – growth at scale can, in theory, lead to an opportunity, particularly if delivered in line with garden community principles. Focusing on HGC, a considerable amount of work has been completed to demonstrate the ability to bring forward a garden community, including in respect of supporting good health via green infrastructure, active travel infrastructure, sports / recreation facilities and a mix of uses in support of walkable communities. The intention is also to support the town centre regeneration, including via an extended Nickey Line.

For the other strategic urban extensions there is confidence generated on account of the Strategic Sites Design Guidance report published as part of the consultation in 2023, but there remains a need for further work on concept masterplanning, design etc. West London Colney is one site where a concern was raised through consultation in 2023 regarding development density, noting adjacent Napsbury Park.

- **Neighbouring uses** – an issue in constrained areas can be pressure to direct new homes to locations adjacent to main roads and railways where there is degree of air and noise pollution. West of Redbourn does stand-out as a site very closely related to the M1, plus this also applies to HGC, albeit at HGC there will certainly be ample opportunity to avoid and mitigate noise pollution through masterplanning, landscape, design and earth bunds or other noise mitigation. Noise pollution is typically reflected in house prices, but there can be impacts not accounted for by the market.

Other sites of note are: North of Oakwood Road, Bricket Wood, is close to M25 J21a, but it is noted that there is an existing earth bund between the site and the junction; and Harper Lane, north of Radlett, is adjacent to the train line to London, but it is noted that the track here is in a cutting.

- **Green and blue infrastructure** – to reiterate points made above, a number of the sites are associated with a clear opportunity, and strategic sites can tend to give rise to a particular opportunity. East Redbourn stands out as a smaller site associated with a particular green/blue infrastructure opportunity.

Another key site of note is West London Colney, which is adjacent to Napsbury Park (to the north) and the River Colne (to the south), where the Government permitted SRFI is set to deliver a country park.

- **Access to the countryside** – the District is broadly well served by a network of public rights of way linking settlements to high quality countryside, including river corridors, woodlands, common land and attractive rural settlements, with key assets including the Heartwood Forest, the Ver-Colne Valley Walk and commons closely integrated with settlements (most notably Harpenden, Redbourn and Bricket Wood), plus there is a need to factor-in the series of country parks set to be delivered alongside the Government-permitted SRFI in the south of the District. However, there is some variability, in terms of access to the countryside, such that growth-related opportunities might be explored. For example, there are woodlands / woodland complexes where improved accessibility might be sought.

Focusing on NE Harpenden, the site does benefit from access to raised land strongly associated with the Chilterns to the north and east and the River Lee corridor to the south. The River corridor is not entirely accessible, which is an opportunity that might feasibly be explored (feasibly even with the aim of a continuous footpath to Wheathampstead), but regardless is associated with a range of uses that could benefit the new community, including accessible greenspace, allotments and employment land.

- **Active travel** – this is a focus of discussion under other headings, but also warrants mention here, as access to active travel infrastructure (linking to key destinations) is important for good health, and new / upgraded infrastructure is a key means of achieving ‘planning gain’ to the benefit of existing community.

The District has a very good existing network, including cycle routes along two former train lines, and this network has been a key factor influencing site selection. HGC and East Redbourn are located on the Nickey Line, and Glinwells (east of St Albans) is also located on an offroad cycle route. Other urban extensions with clear potential to deliver strategic upgrades to cycle infrastructure include NW Harpenden, North St Albans and Harper Lane; however, the site proformas for numerous other proposed allocations also identify active travel routes that should be a focus of developer contributions. Overall, there is confidence that a strategic / targeted approach is proposed to realising key opportunities.

- **Traffic congestion** – directing growth in order to minimise traffic congestion is often a key issue for existing communities. The outcomes of detailed traffic modelling are awaited at the time of writing, but it fair to highlight HGC, London Colney and Redbourn as being well-connected to the strategic road network, as well as the collection of villages in the south of the District, although this area is set to experience an increase in HGV traffic as a result of the Government permitted SRFI.

However, connectivity to the strategic road network is far from the only consideration, as there is a need to consider trip destinations, for example residents of Redbourn typically attend secondary school in Harpenden, and it is noted that the new secondary school at Harpenden is located at the eastern extent of the town (and the context is that Harpenden is subject to some inherent traffic issues, as discussed in Section 5.4). London Colney also warrants mention in that concerns were raised through the consultation in 2023 regarding traffic resulting from a new secondary school. There is a need to consider the cumulative effects of growth locations, for example in the north west of Harpenden.

Road safety is a related issue, and the key site for consideration in this respect is Harper Lane (North of Radlett), as discussed in Section 5.4. Certain of the proposed non-strategic allocations also require further work in respect of achieving safe and suitable access, but it is also the case that several sites flagged in 2023 as generating some concern in this respect have now been deleted from the plan.

- **Green Belt** – warrants mention here as an issue that can clearly generate a high degree of interest / concern amongst local residents. The contribution of land to the defined purposes of the Green Belt has been a major factor influencing the progression of sites to the reasonable growth scenarios; however, and as discussed in Section 5.4, HGC and four of the eight proposed strategic urban extensions are not supported in full by the Green Belt Review (although HGC is supported in part, as is NE Harpenden).

However, in each case the decision to ‘depart’ somewhat from the Green Belt Review is on account of wider factors including opportunities to secure infrastructure and wider benefits, and there is a need to consider these sites in context, i.e. mindful that non-allocation would result in increased pressure for growth elsewhere. Also, it is notable that all four sites featured in the previous version of the St Albans Local Plan (withdrawn in 2020), such that they have been the focus of a considerable amount of consultation over the years (with North St Albans perhaps standing out as generating local concern).

- **Village vitality** – as discussed in Section 5.4, a number of settlements are associated with low recent and committed growth, for example Redbourn. There are not known to be any particular issues locally, but in general: a lack of new housing can contribute to an ageing population and suppressed household formation; the national trend towards online retail is putting strain on local and neighbourhood centres; and rural primary schools can struggle to maintain school rolls, due to a recent period of low birth rates.

- **Community infrastructure** – have already discussed above, but other considerations include GP surgeries and also care homes / care facilities. The IDP (2024) sets out how needs will be met.
- **Relative deprivation** – this is more of a cross-border issue (see Figure 2.2, above; also the discussion of relative deprivation in neighbouring areas presented in Appendix II). It is important to recognise the potential for HGC to support regeneration objectives for Hemel Hempstead as a whole, and also a need to be mindful of objectives around addressing pockets of relative deprivation in Hertsmere Borough.
- **Gypsies and Travellers** – providing for Gypsy and Traveller accommodation needs is a key issue and a major challenge locally, as discussed within Section 6.

9.7.3 Finally, with regards to proposed **development management policies**, numerous policies are broadly supported, from a communities perspective, and no policies stand-out as leading to a significant degree of tension with communities objectives. The following points are noted:

- Policy LG3 (Hemel Garden Communities Place Principles) – presents four ‘pillars’ under which policy criteria are then presented, and one of the pillars deals with ‘engaged communities’. In this respect, it is also noted that Policy LG1 (Broad Locations) requires that at these sites (of which there are 12 in total) there is a need to: *“Establish a Community Partnership Management Organisation with sufficient assets to provide sustainable management of community facilities and/or open spaces.”*
- Policies LG1 (Broad Locations) and LG4 (Large, Medium and Small Sites) also require the planting of at least 1 semi-mature tree for each dwelling, and the following requirement is also supported (but there is space for added spatial specificity within site specific policies): *“Provide new or provide contributions to enhance existing strategic, local and recreational public open space, including managed woodland and ecological network links... Positively relate and integrate the development to the surrounding buildings and landscape.”*
- Strategic Policy SP13 (Health and Wellbeing) sets out that: *“Large developments (100+ homes) must be provided with appropriate public open space including children’s playground(s).”* It is noted that policy requirements have been adjusted in response to the 2023 consultation response from Sports England.
- Policy NEB12 (Green Space Standards and New Green Space Provision) – then sets out detailed standards, with a requirement for “full provision” at sites involving greater than 100 homes.
- There is a well-targeted / locally specific approach to green and blue infrastructure designations set out across the following policies: NEB2 (Local Green Spaces); NEB3 (Non-Designated Local Green Space); NEB4 (Significant Publicly Accessible Green Areas); and NEB5 (Blue Infrastructure).
- Policy LG6 (Green Belt Compensatory Improvements) – notably requires that Green Belt proposals include a Green Belt compensation strategy. The policy specifies key issues to be addressed.
- Chapter 12 of the plan document presents a series of eight policies on High Quality Design. Policy DES6 (Building Heights) is of note, setting policy for A) proposals within the defined Building Heights Control Zone; and B) proposals elsewhere. The question of taking a spatially targeted approach to building heights might be given further consideration; e.g. a dedicated consultation on development densities in urban areas was held in 2023 as part of work to prepare the Sevenoaks Local Plan.

9.7.4 In conclusion, a **moderate or uncertain positive effect** is predicted on the baseline, accounting for established objectives. Whilst there may be concerns amongst some members of the local community regarding the negative impacts of housing growth, there is little reason to suggest particular issues constraining St Albans relative to potential growth locations in the sub-region.

9.7.5 There is clear support for HGC, as a garden community and a scheme with a focus on achieving wide-ranging objectives for Hemel Hempstead, and the HGC programme is progressing relatively well outside of the St Albans Local Plan process, albeit with some opposition. With regards to other Green Belt allocations, several give rise to ‘communities’ related issues, but there was also some support for growth through the consultation in 2023 from key organisations. An important consideration is that a good proportion of growth will come forward at sites above 100 homes in size, at which scale developments can be expected to deliver community infrastructure such as play space and open space. A partially outstanding issue is providing for Gypsy and Traveller accommodation needs, but progress is being made and the final position will be clarified by the time of the Local Plan’s examination in public.

9.7.6 A final key consideration is simply the need to adopt a local plan in order to avoid development coming forward in a less well-planned manner, under the presumption in favour of sustainable development or otherwise in a manner that is outside of local control (St Albans is at risk of Government intervention).

## 9.8 Economy and employment

9.8.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform very well, given a highly proactive approach to allocating land for new employment floorspace. There is particular support for HGC, as it will deliver a major new strategic employment location, namely an expansion of Maylands Industrial Estate.

9.8.2 In summary, the spatial strategy involves:

- Protecting existing employment areas, via a single tier of designation, with this approach stemming from the South West Hertfordshire Economic Study.
- A 53 ha allocation at East Hemel Hempstead (Central) providing for a range of uses including offices, research and development, light industrial and distribution, to include 10% small units for SMEs.
- Two small allocations at Rothamsted Research (new since the Draft Local Plan stage, following consultation and consideration of a submitted vision for the future of the research park).
- Support for the 33 ha Government permitted Strategic Rail Freight Interchange (SRFI) at the former Radlett aerodrome, which will deliver mostly B8 distribution/warehousing.
- Policy EMP3 (St Albans City Core Principal Office Location) which sets out that development proposals within this area must avoid net loss of office floorspace that falls within Use Class E(g)(i).

9.8.3 With regards to the wider package of allocations, none are expected to deliver significant new employment land. However, it is important to be clear that there is a strong economic argument for delivering new homes locally, particularly smaller and affordable homes suited to those wishing to work locally.

9.8.4 Another consideration is existing employment uses at several of the proposed allocations, for example Harper Lane and Glinwell (which operates across the sub-region, as discussed [here](#)).

9.8.5 With regards to the total quantum of employment, the following is a key statement from the plan document:

*“Due to these locations providing an agreed oversupply for St Albans District’s own needs, the excess will assist Dacorum Borough and potentially other South West Herts local authorities in meeting some of their employment requirements.”*

9.8.6 With regards to **development management policy**, the key policy of note is SP5, which is discussed above. Also, EMP4 (Hertfordshire Innovation Quarter, Herts IQ) supports development and redevelopment which provides or supports knowledge-based research and development activities for Herts IQ at the following locations: Rothamsted Research; Building Research Establishment (BRE); and the proposed employment area at East Hemel Hempstead (Central). No DM policies can be identified that give rise to a significant tension with economic objectives.

9.8.7 In conclusion, a **significant positive effect** is predicted on the baseline, mindful of established objectives. This conclusion is as per that in 2023, but there is now increased confidence in the conclusion, in light of the South West Herts Economic Study Update (2024) and a new proposal to support expansion at Rothamsted Research. Overall, a highly proactive approach is taken to providing for sub-regional employment land needs and supporting the objectives of the Herts IQ, which is of larger-than-local significance, and potentially even of national significance given its specialist focus on the ‘green economy’. Also, it is important to recognise that a key aim of HGC is to support regeneration of Hemel Hempstead town centre and to support employment within the Hemel Hempstead urban area.

## 9.9 Historic environment

9.9.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform well relative to the alternatives. East St Albans is subject to limited constraint, and this is also the case for the majority of the proposed non-strategic urban extensions at lower tier settlements that are also a focus of the appraisal.

9.9.2 With regards to aspects of the spatial strategy that are held constant across the scenarios in Section 6:

- **Hemel Garden Communities** – was historically a raised rural landscape between river / transport corridors and, accordingly, sensitivity is primarily associated with a modest scattering of farmsteads, as well as lanes and field boundaries. Overall historic environment sensitivity appears to be quite low, at least in the St Albans part of HGC.

The primary area of sensitivity is potentially Westwick Row, close to the southern extent of the HGC area, which is a rural lane associated with a number of listed buildings, including one that is Grade II\* listed. There is also a need to note the extensive Gorhambury Estate located to the east, between the M1 and St Albans. This is a Grade II listed Registered Park and Garden, within which Grade II\* listed Gorhambury is located quite centrally. However, it does not seem likely that important views/vistas linked to the house and estate would be impacted by HGC, given topography and noting the historic access points. Also, it seems that there is little if any risk of development creep eastwards towards St Albans over time. A further consideration is that support for the St Albans components of HGC would help to minimise pressure for extensive housing growth within the Gade Valley, within Dacorum District, which is quite sensitive in historic environment terms.

Finally, in respect of HGC, it is important to be clear that the Council's Heritage Impact Assessment 2024 provides detailed assessments and recommendations in relation to potential heritage impacts.

- **Other strategic allocations** (i.e. all other than East St Albans, which is discussed in Section 6) –
  - Sites subject to limited constraint are – North St Albans (although historic Sandridgebury Lane passes through the site, and is likely a popular route linking to historic Sandridgebury and Sandridge); Glinwell (east of St Albans), which is a previously developed site, and where the possibility of increasing appreciation of the Grade II listed former station house at its southern extent might be envisaged (the glasshouses are not thought to have significant heritage value, unlike elsewhere in the sub-region); and Harper Lane (to the north of Radlett), which is distant from the historic core of Radlett, although a consideration is the proximity of the former [Harperbury](#) estate to the east.
  - North West Harpenden – Cooters End Lane is a historic rural lane associated with one Grade II listed farmhouse and it is an important walking route, forming part of the Chiltern Way long distance path.
  - NE Harpenden – was historically rural such that there are few listed buildings in the vicinity, but a sensitivity relates to the common land and network of rural lanes associated with raised ground to the north and east. In particular, an unnamed lane links the site to Mackeyre End, which is a short distance to the east and highly sensitive, but there is little reason to suggest significant traffic down the lane (although there is a need to consider the possibility of future school expansion).
  - West Redbourn – is also subject to fairly limited constraint, assuming that steps are taken through masterplanning (noting the current planning application) to buffer the Grade I listed parish church and associated conservation area that is near-adjacent to the south. Planning for a comprehensive scheme across the site as a whole (as opposed to the current planning application, which covers only the southern part) should assist in this regard. Also, and more generally, extensive greenspace at the southern extent of the site would assist with maintaining the characteristic historic settlement pattern, with two areas of settlement separated by an intervening area of common land. However, some concerns regarding impacts to historic lanes will remain under any masterplanning scenario. The two central lanes have limited sensitivity, noting that they are essentially farm access tracks and have had hedgerows removed, but the lanes at the northern and southern extents have historic sensitivity, perhaps most notably Lybury Lane, which links to Flamstead and has clear historic sensitivity.
  - West London Colney – is clearly subject to significant constraint on account of adjacent Napsbury Registered Park and Garden (RPG, Grade II). There would likely be an impact to the setting of the RPG, noting the river valley topography and the accessibility of the RPG. However, there are no listed buildings (the former hospital was built in the early 20<sup>th</sup> Century), and an agricultural setting will presumably be maintained in perpetuity to the north of the former hospital site, as the agricultural land to the north falls within the designated RPG, whilst land to the south does not. The consultation response received from London Colney's collective elected representatives in 2023 discusses the importance of accounting for Napsbury's character through decisions on development density and avoiding increased car movements through the estate, and these issues are well-understood / have fed into work on masterplanning etc over the years, noting that this is a long-standing proposed allocation.
- **Non-strategic allocations at St Albans and Harpenden:**
  - St Albans – three of the four proposed allocations (all bar the site with permission) are subject to an element of historic environment constraint. Beginning with Verulam Golf Club, the St Albans Conservation Area is adjacent, but there are few concerns in practice. Secondly, North East of Austen Way is adjacent to two Grade II listed buildings associated with a former farm, which can be seen on [historic mapping](#) as associated with a heavily wooded landscape. The listed buildings currently mark the urban edge, which serves to highlight the importance of a comprehensive approach to urban expansion, as opposed to a piecemeal approach that risks erosion of historic character over time.

Finally, Bedmond Lane is clearly sensitive on account of the adjacent conservation area and scheduled monument and noting that the course of the Roman City Wall is adjacent to the north (see historic mapping linked above). However, it can be seen that other modern development has come forward on land just outside of the Roman Wall, and there is good potential to avoid and mitigate impacts. Site specific policy states: *“The known archaeological information suggests that the northern third of the site is particularly sensitive in heritage terms. Development proposals should avoid new buildings in this part of the site, and should better reveal the significance of the below-ground heritage assets.”*

– Harpenden – five sites were flagged as constrained in the ISA Report (2023) and of these two have now been deleted from the plan. With regards to the remaining three constrained sites:

North of Wheathampstead Road – is adjacent to two Grade II listed buildings and comprises mature gardens. From the pre-1914 OS map it appears that the listed buildings are associated with Piggotshill Farm, whilst the site was the southwest extent of the parkland associated with ‘Highfirs’, which is now a golf club. As such, it appears that the site may not have been historically strongly linked to the listed buildings. Matters have been explored through the current pending planning application.

Rothamsted Lodge, Hatching Green – is located within the Harpenden Conservation Area, and the buildings onsite appear on the pre-1914 OS map (associated with one of the entrances to Rothamsted). However, there is an adjacent existing permission for five bungalows (ref. 5/2022/1814).

Rothamsted Research – there are two small employment allocations, one of which was previously proposed for housing, with the ISA Report (2023) stating it will *“likely have a degree of impact on the setting of Grade 1 listed Rothamsted, given the public rights of way in the area, including an adjacent footpath that follows a historic tree-lined ‘avenue linking Rothamsted to Harpenden.”* Employment could involve bulkier buildings than residential, but equally there could be merit to maintaining a clear focus on employment in this sensitive sector of land (albeit it is near adjacent to the town centre).

9.9.3 With regards to development management, perhaps the key point to note is that the Council’s Heritage Impact Assessment 2024 provides assessments and recommendations in relation to potential heritage impacts for 52no. allocation sites (sites agreed with Historic England and listed in Appendix 6 of the Plan); and that Policies LG1 and LG4 include a requirement to address these recommendations.

9.9.4 Otherwise, in respect of development management policy:

- Policy LG3 (HGC Place Principles) – does not reference the historic environment, but this is likely appropriate given references to key issues in the site specific proforma.
- Policy TCR5 (St Albans City Centre Culture, Heritage, Civic Pride and the Leisure Economy) – is broadly supported, although there is only criterion on heritage, dealing with a very specific matter.”
- Policy NEB10 (Landscape and Design) – seeks to ensure a focus on responding to established landscape character, including from a historic environment perspective.
- Chapter 11 of the plan presents a series of policies dealing with the historic environment. These are fairly standard policies (in the context of likely forthcoming National Development Management Policies), although there is some tailoring to the St Albans context, including the policy on conservation areas.
- No development management policies can be identified with the potential to result in a significant negative effect (where significance is understood in the context of the Local Plan as a whole).

9.9.5 In conclusion, a **neutral effect** is predicted on the baseline, having accounted for both strategy/sites and DM policies (area-wide and site-specific), and mindful of established objectives. HGC is subject to limited constraint, and whilst numerous sites are subject to a notable degree of constraint, there is typically good potential to avoid and mitigate impacts at the development management stage, and a robust policy framework is proposed in support of this. Adjustments made since the Draft Local Plan stage are supported, including deletion of sensitive sites at Harpenden, and proportionate Heritage Impact Assessment (HIA) work has been undertaken in line with recommendations made by Historic England through the consultation in 2023.<sup>28</sup> HE raised a particular concern with a site at Wheathampstead, but those concerns should now be allayed in light of the HIA work completed.

<sup>28</sup> Historic England’s consultation response notably explained: *“It is a question of proportionality. The bigger the site or the more important the heritage issues, the more evidence we would expect to see.”*



## 9.10 Homes

9.10.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform well, although there is unsurprisingly a preference for higher growth alternatives. The key points to note are:

- The proposal is to set the housing requirement at Local Housing Need (LHN) over the plan period as a whole, although this is a 'stepped' requirement in that the requirement is set below LHN in the early years of the plan period and then the requirement is commensurately set above LHN in the latter years (when HGC will be delivering at pace). A stepped requirement is not supported from a pure 'housing' perspective, because providing for housing needs is an immediate priority (e.g. given a very high affordability ratio and very high need for affordable housing). However, there is a clear case for a stepped requirement given reliance on HGC and limited realistic small site options, particularly on the basis of the evidence provided by the HELAA, Green Belt Review and the Urban Capacity Study.
- There is a good mix of sites and a 'supply buffer' over-and-above the housing requirement, such that there is confidence that the housing requirement will be provided for in practice across the plan period (also recalling the potential to boost supply in the latter years through a plan review).

9.10.2 There is limited potential to meaningfully elaborate on the appraisal presented in Section 6, in respect of the merits of the proposed spatial strategy; however, considerations include:

- **Hemel Garden Communities** – is inherently associated with uncertain delivery timescales, but certainty is increasing over time as further work is completed. At the current time the assumption is 4,300 homes in the plan period, as opposed to a 4,750 homes assumption at the Draft Plan consultation stage (2023). It is important to recognise that the intention is for the Dacorum part of HGC to deliver concurrently, such that there are naturally risks around the capacity of the market to absorb new homes.
- **Other strategic allocations** (i.e. all other than East St Albans, which is discussed in Section 6) – all are broadly supported in that there will be good potential to deliver a mix of homes (to include a policy compliant quota and mix of affordable homes) and the two largest sites (also East St Albans) are set to deliver an extra care facility. Also, a number of the strategic allocations have good deliverability credentials, in terms of a single land owner and/or progress has been made on a planning application, plus it is important to note that several have been proposed allocations for a number of years.
- **Non-strategic allocations at St Albans and Harpenden** – certain of them require further work to confirm layout and access arrangements, but there is little reason to suggest implications for affordable housing delivery, and delivery challenges can be addressed via: A) conservative assumptions made regarding delivery timescales; and B) a healthy supply buffer.
- **Green Belt PDL and urban PDL sites** – capacity and delivery assumptions require ongoing scrutiny, recalling that only a very small proportion of these sites were proactively submitted as available to the Council through the HELAA. Subsequently work has been undertaken to establish availability with a reasonable degree of confidence, through the Urban Capacity Study, but there remains an inherent risk of unforeseen issues with a bearing on the ability to bring forward a planning application, such as complex land ownership, existing leases / high existing use value and dependencies with other sites (e.g. due to a need to relocate an existing use, such as parking). It is crucially important (from a wide-ranging sustainability perspective, as opposed to solely from a housing perspective, given the presumption in favour of sustainable development) that the Local Plan supply is sufficient to meet the housing requirement in practice over the course of the plan period, accounting for delivery risks.

9.10.3 With regards to development management policy:

- Policy HOU1 (Housing Mix) – specifies the housing mix required at sites involving more than 10 homes, with a breakdown by both size and tenure, including a distinction between affordable home ownership and affordable rent tenures. This represents a considerable step-change in respect of response to the housing crisis, with wide ranging benefits such as for health and wellbeing, communities and the local economy (and, in turn, reducing out-commuting). With the Local Plan in place it will be possible to require higher density developments comprising smaller homes than would otherwise be delivered by the market, suited to first time buyers, young families and downsizers. Also, there will be a step-change in affordable housing delivery, with several hundred delivered every year (with a tenure mix in line with policy) as opposed to fewer than 100, which is the typical rate of delivery (see the [Housing Strategy](#)).

- Policy HOU2 (Affordable Housing) – requires affordable housing on sites involving 10 or more homes, or where the site has an area of 0.5 hectares or more. At qualifying sites the requirement is then for 40% of homes as on-site affordable housing, with a tenure mix of: 30% social rented; 30% affordable rented and 40% affordable home ownership, which includes 25% of all affordable housing as First Homes. The policy also requires a design approach where affordable housing is indistinguishable.

40% affordable housing is an ambitious approach in the national context. However, for some sites in St Albans there could be the potential to require affordable housing delivered at a higher (and/or a tenure mix even more strongly focused towards rented or even social rented affordable housing). This would have viability implications though, with implications for the ability to deliver on wider policy objectives, such as net zero development, biodiversity net gain, space / accessibility standards and infrastructure delivery. It is not clear that there is any potential ‘flex’ in respect of any of these wider objectives that might be explored with a view to potentially creating viability headroom for affordable housing.

- Policy HOU3 (Specialist Housing) sets out policy in support of specialist housing to meet the needs of older people and people with disabilities. The supporting text explains: “*Specialist housing is allocated at sites listed in Part B. Planning applications by specialist housing providers on ad hoc sites and on HCC land will deliver additional units of accommodation across the Plan period. Taken together, these sources should meet demand for specialist housing.*” Another consideration is the possibility of a large scale ‘integrated retirement community’, which HCC supports as a concept (see 2023 consultation response). It is understood that there may still be the potential to explore this as an option for HGC.
- HOU6 (Gypsies, Travellers and Travelling Show People) – the matter of proactively providing for new pitches to meet the established need figure, which is very stretching, has already been discussed in Section 6 (under the ‘communities’ heading). In addition to identify new ‘supply’ through the plan, there is also a crucially important need to ensure a suitably permissive DM policy in support of windfall planning applications. In this light, there are no concerns regarding the policy being overly restrictive.

9.10.4 Finally, with regards to DM policies, it is important to be clear that numerous do give rise to a degree of tension with housing objectives, because they could lead to cost implications for developers and, in turn, could potentially hinder delivery or require compromises to be made in respect of affordable housing. However, it is not possible to pinpoint policies that could potentially be ‘flexed’ to create viability headroom in support of housing objectives. Viability assessment work tends to focus on net zero development as a key policy choice with cost implications, but there is no clear opportunity to reduce stringency of policy.

9.10.5 In conclusion, a **moderate or uncertain positive effect** is predicted on the baseline, accounting for established objectives. The plan represents a considerable step-change, in terms of addressing housing and wider accommodation needs locally, and affordable housing is prioritised as part of the suite of development management policies (in the context of whole plan viability), but there is a need for further work, including around deliverability and providing for Gypsy and Traveller accommodation needs.

## 9.11 Land, soils and other resources

9.11.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform broadly on a par with the alternatives appraised, and no significant concerns are raised. The proposed spatial strategy will likely result in significant loss of BMV agricultural land, but St Albans cannot be said to be particularly constrained in the sub-regional context (the national dataset shows SW Herts to be mostly grade 3 quality land, whilst within NEC Herts there is significant grade 2 quality land, and West Essex is associated with very widespread grade 2 quality land) such that there is no clear argument for lower growth locally.

9.11.2 With regards to aspects of the spatial strategy that are held constant across the scenarios in Section 6:

- **Hemel Garden Communities** – the majority has been surveyed (‘post 1988’ dataset; see magic.gov.uk) and found to mainly comprise grade 3b quality land, although there is also considerable grade 3a and some grade 2. This is contrary to the national “provisional” dataset, which suggests a concentration of grade 2 land in this area. The parts that have not been surveyed appear less likely to comprise BMV.
- **Other strategic allocations** (i.e. all other than East St Albans, which is discussed in Section 6) – only North St Albans has been surveyed, with the finding being that the site comprises mainly grade 3a land.
- **Non-strategic allocations at St Albans and Harpenden** – the two largest non-strategic allocations at Harpenden are both located to the west of the town and are in productive agricultural use. The land here has not been surveyed but is shown as grade 3 quality by the nationally available dataset.

- 9.11.3 Other spatial strategy-related points for discussion here relate to: A) making best use of previously developed land, which the plan clearly does set out to do, with extensive work having been undertaken to maximise urban supply and two Green Belt PDL sites proposed for allocation despite not being well located in transport and accessibility terms; and B) avoiding the sterilisation of known minerals resources, which is a matter that is discussed in Section 6, with a conclusion reached that there are few concerns. At two nearby proposed allocations – Glinwell and West London Colney – there is a requirement that: “*A Mineral Resource Assessment must be undertaken to identify the quantity and quality of sand and gravel and the viability of prior extraction, in accordance with adopted Minerals Local Plan...*”
- 9.11.4 With regards to **development management policy**, one point to note is that Policy LG3 (Hemel Garden Communities Place Principles) requires: “*a Household Waste Recycling and Local Authorities Depot facilities to meet the needs of new and existing communities*”.
- 9.11.5 In conclusion, a **neutral effect** is predicted on the baseline. Whilst there would be significant loss of productive agricultural land, it seems likely that the majority would be land that is *not* classed as BMV. Also, it is important to recognise that best use is made of brownfield development opportunities

## 9.12 Landscape

- 9.12.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform notably well relative to the alternatives appraised. East St Albans is subject to relatively limited landscape constraint (assuming no future development creep) and most of the small proposed allocations at lower tier settlements are quite well contained in the landscape (Amwell Top Field, Wheathampstead, is a somewhat sensitive site, but concerns are allayed by latest proposals, including a clear commitment to develop only part of the site).
- 9.12.2 With regards to aspects of the spatial strategy that are held constant across the scenarios in Section 6:

**Hemel Garden Communities** –this is a raised landscape between river corridors that was historically sparsely settled (as discussed). In the central part of the area the Maylands Industrial Estate and the A414 and M1 are major urbanising influences. Elsewhere, there is a fairly low density of lanes and public rights of way through the area, but there are clear and somewhat extensive views from the two road corridors historically linking Hemel Hempstead (which was a historic settlement, prior to major 20<sup>th</sup> Century expansion) to Redbourn / Harpenden and St Albans, as well as from the Nickey Line (a former railway line now a leisure footpath and cycleway). To the south of the area there appears to be good potential to draw-upon topography to secure a defensible new Green Belt boundary, and hence avoid concerns regarding future development creep (the A4147 follows something of a ridge of raised land).

To the north there is greater sensitivity, and for this reason this area has recently been examined through a detailed study, both in terms of landscape and Green Belt sensitivity. With regards to landscape sensitivity, the Study finds that the St Albans land is of notably lower sensitivity than land to the west within Dacorum (see Figure 9.2), whilst the Green Belt work leads to clear recommendations aimed at protecting “the essential separation” between HGC and the southern edge of Redbourn. As part of this, it recommends locations for “robust” new Green Belt boundaries, which will be important noting that the B487 / Nickey Line corridor follows a shallow valley towards Redbourn. Also, concerns are allayed by the firm proposals in respect of new open space including a country park (see Figure 9.1).

A key consideration is that support for the St Albans components of HGC will help to reduce pressure for extensive growth within the Gade Valley to the north of Hemel, which is sensitive in landscape and wider terms, including close links to the Chilterns. It is set to be left undeveloped (see Figure 9.1).

- **Other strategic allocations** (i.e. all other than East St Albans, which is discussed in Section 6) –
  - Harper Lane (east of Radlett) – is notably unconstrained in landscape terms and is recommended by the Green Belt Review (2023). It is not apparent that there are any sensitive views into or across the site, and there is limited risk of problematic development creep to the east (assuming landscaping etc).
  - Glinwell (east of St Albans) – also generates few landscape concerns as a brownfield site (and it is not the case that the glasshouses contribute to local landscape character). Welwyn Hatfield Borough do not object to the allocation, but highlight the need for defensible boundaries, noting the sensitivity of the Green Belt gap to Hatfield. As part of this, there is a need to consider the site in the context of: Smallford to the east, sports pitches to the north, the proposed school location and proposed Oakland College Sports Zone to the northwest and the extensive LWS (former landfill) to the south. There is merit in a comprehensive long term approach for this wider area, e.g. noting ancient woodlands.

- East St Albans – is a focus of appraisal in Section 6. In summary is subject to limited constraint, but there is a need for a focus on long term comprehensive growth (as per Glinwell discussion, above).
- West London Colney – comprises low lying land within the Colne Valley. Also, whilst the land is not recommended by the Green Belt Review, the new homes would be delivered adjacent to settlement edge with the new school to the west, such that there will be good containment (given Napsbury Park to the north and the floodplain to the south). However, the site is highly visible from the B5378 Shenley Road (with a prominent historic building at the edge of the Napsbury Park Conservation Area visible beyond) and there are also extensive views across the site (towards the River Colne and raised wooded land beyond) from Napsbury Park, which is an important publicly accessible parkland.

There is also a need to consider the adjacent bridleway, which forms part of a network of public rights of way along the Colne Valley. However, on the other hand, this landscape is set to evolve, given the Government-permitted SRFI and associated country parks. It will be important to take a strategic approach to masterplanning across the broad landscape stretching from the M25 to Napsbury Park.

- West Redbourn – the adjacent M1 is clearly an urbanising influence, and there are very limited views from roads or lanes, with the settlement ‘facing away’ from the site. However, there is a high density of public rights of way, including the Hertfordshire Way long distance path.
- NW Harpenden – is arguably subject to the greatest degree of constraint, given rising land visible from the A1081 Luton Road (‘filtered’ views) and given the adjacent Chilterns Way footpath (not necessarily one of the more sensitive sections of the path, although there is a need to consider an increasing focus nationally on designating rural lanes as [Quiet Lanes](#)). However, on the other hand, the site would be well-contained within the dry valley that historically contained the built form of Harpenden, prior to 20<sup>th</sup> Century expansion to the east (spilling into the valley of the River Lee) and to the southwest (raised land historically associated with common land). N.B. the corollary is a surface water flood channel.
- North St Albans – Sandridgebury Lane follows a shallow valley, with higher ground to the south (Bernard’s Heath, now within the St Albans urban area) and to the north (Childwick Green and the Heartwood Forest). This arguably lends a degree of support for growth in this area, from a landscape perspective, and there is also a need to factor-in the adjacent site with planning permission for 150 homes. There is also a need to note the urbanising influence of the Porters Wood industrial area to the south; however, on the other hand, there is an argument to suggest that the industrial area, along with its two valued linear woodlands (Beech Bottom and Long Spring) and nearby St Albans Girls School, represents an appropriate northern extent to the St Albans urban area, from a landscape perspective. There is also a need to note the public right of way following Long Spring, which is likely to be a popular walking route linking St Albans to the Heartwood Forest. It appears to be the case that the footpath partly follows Sandridgebury Lane, hence increased traffic should be avoided.
- NE Harpenden – is associated with a quite steeply rising land from the River Lee / Lower Luton Road. As discussed above, Harpenden was historically associated with the dry valley to the west, with limited built form (but considerable industry) along the Lee Valley (which also formerly supported a Luton Branch of the train line to Cambridge). There is a clear argument for seeking to draw upon topography to contain the expansion of Harpenden, and particularly avoiding problematic ‘sprawl’ along the river valleys or onto raised land associated with extensive woodland and common land. In this respect, a key point to note is the proposal to leave the highest point of land within the site undeveloped, and also to draw upon Bower Heath Lane (which follows a shallow valley) as a new defensible boundary. There appears to be fairly limited sensitivity in respect of views from road/lanes and public rights of way, and the possibility of improving the public rights of way network – such that Harpenden is better linked to the Lee Valley and the Chilterns south of Luton – might feasibly be explored. Finally, it is noted that a Chilterns NL boundary review is underway, but this is not expected to affect the site.

• **Non-strategic allocations at St Albans and Harpenden:**

- St Albans – none of the four allocations are thought to give rise to significant concerns from a landscape perspective. North East of Austen Way is well contained in the landscape but does represent a continuation of a long term trend for piecemeal expansion in this sector of the city-edge.
- Harpenden – none of the ten allocations are thought to give rise to significant concerns from a landscape perspective. The two largest sites will expand the town to the northwest, where the settlement edge is associated with a plateau between the Lee and Ver valleys, but both sites are logical expansions from a landscape and green belt perspective and give rise to limited concern of creep.

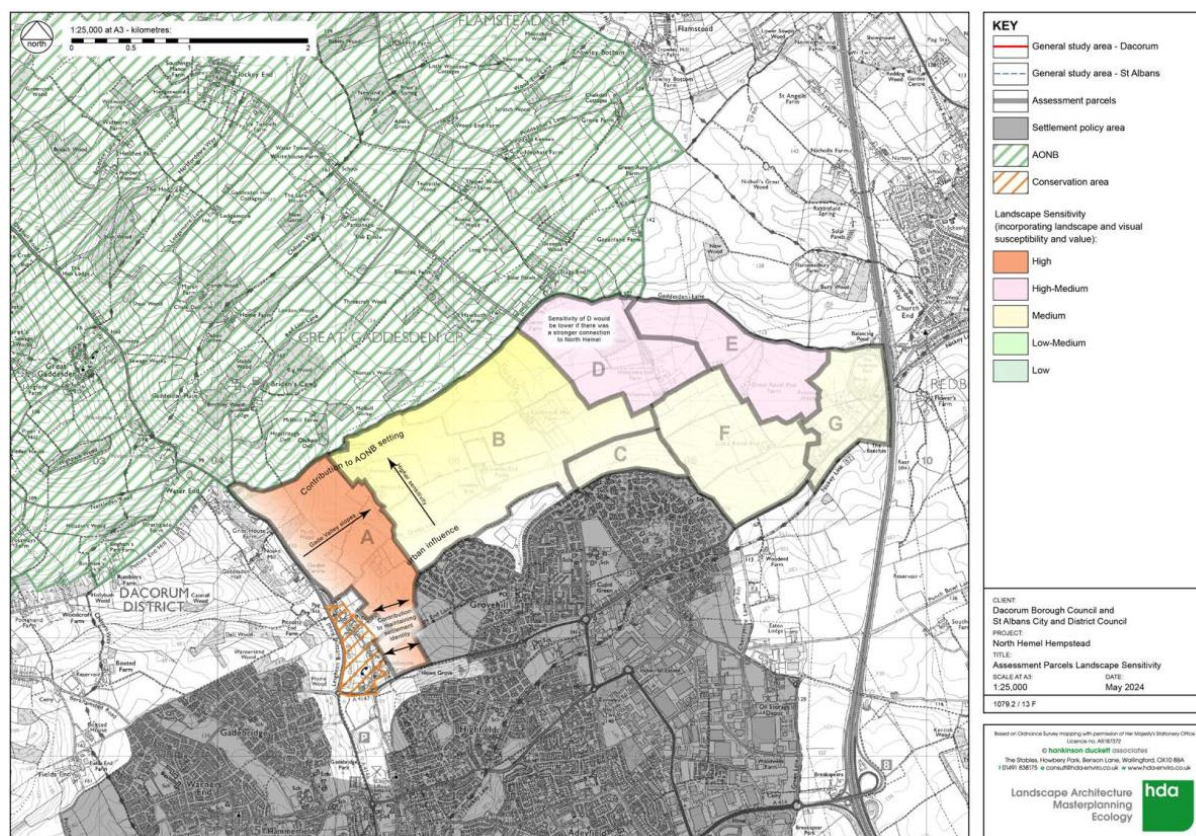
- **Green Belt PDL and urban PDL sites** – the Green Belt PDL site at the edge of HGC warrants ongoing consideration in terms of a risk of development creep, as discussed in Section 5.4. With regards to the urban PDL sites, none are known to give rise to particular townscape concerns, but implications for city / town centre parking and, in turn, traffic is a matter for ongoing scrutiny.

9.12.3 With regards to **development management policy**, numerous key policies have already been discussed under other headings. Focusing on Policy Strategic Policy SP1 (A Spatial Strategy for St Albans District) notable requirements are around: making the best use of land in urban areas; significantly increased tree cover; and “Green Belt compensatory improvements - including significant new country parks, better access to the countryside via new and improved rights of way, new and improved habitat connectivity.”

9.12.4 In conclusion, a **neutral effect** is predicted on the baseline, as per the conclusion reached in 2023. There is tentative support for HGC from a landscape perspective, albeit this is raised land in proximity to the Chilterns NL. Furthermore, there is clear support for directing growth strongly in line with the findings of the Green Belt Review (2023). With regards to the four proposed strategic urban extensions involving land not recommended for further consideration by the Green Belt Review, all are associated with landscape sensitivities (perhaps most notably NE Harpenden, and perhaps less so East St Albans), but the significance of the sensitivities / impacts is potentially limited.

9.12.5 However, the fact remains there are clear sensitivities, particularly given narrow settlement gaps in the south of the District (also mindful of in-combination effects with neighbouring local plans, as discussed further below) and raised landscapes in the north of the District linked to the Chilterns. There remains a need for work in respect of site capacities, layouts, greenspace / landscaping and robust boundaries.

Figure 9.2: Landscape sensitivity in the northern part of the HGC area



## 9.13 Transport

9.13.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform notably well relative to the alternatives appraised, although one of the alternatives is appraised as preferable, namely a scenario involving replacing non-strategic urban extensions at lower tier settlements with an additional St Albans strategic urban extension. There are wide-ranging arguments for non-strategic urban extensions at lower tier settlements, but there is always a theoretical transport case for concentrating growth.

9.13.2 The next matter for consideration is the evidence provided by the Modal Shift Study (2024). Table 9.1 presents key findings, namely modal shift achievable at all settlements and at select proposed allocations.

**Table 9.1: Key findings of the Modal Shift Study (2024)**

Location	Modal shift opportunity (with some notable results highlighted)			
	Sustainable transport	Walking	Cycling	Public transport
St Albans (inner)	47%	29%	24%	5%
St Albans (outer)	33%	21%	21%	1%
Harpenden	30%	15%	13%	<b>13%</b>
London Colney	22%	8%	12%	1%
Redbourn	21%	4%	14%	3%
Wheathampstead	<b>27%</b>	3%	<b>20%</b>	4%
Southern Villages	24%	<b>8%</b>	14%	1%
HGC North	32%	14%	<b>24%</b>	<1%
HGC Northeast	28%	10%	15%	<b>2%</b>
HGC South	25%	12%	13%	<1%
North St Albans	28%	11%	17%	<1%
NE Harpenden	23%	7%	18%	<1%
East St Albans	<b>34%</b>	<b>13%</b>	<b>25%</b>	1%

9.13.3 Next there is a need to summarise the findings of transport modelling (2024), which has compared the baseline to three Local Plan scenarios: 1) no mitigation; 2) IDP upgrades and blanket 10% modal shift; and 3) IDP upgrades and mode shift in line with the Modal Shift Study (Table 9.1).<sup>29</sup> The findings are:

- Baseline – there is an increase in vehicles of between 13%-18% in the peak hours which results in an average speed reduction of around 10% in the peak hours.
- Option 1 – the number of vehicles increases by a further 8% and average speeds reduce by 6%-7%.
- Option 2 – compared to Option 1 there is a reduction of around 4% of vehicles and increases in speeds of between 5-7% in the peak hours.
- Option 3 – compared to Option 1 there is a reduction of around 4% of vehicles and increases in speeds of between 6-7% in the peak hours.

9.13.4 Finally, there is a need to consider the Traffic Impact Assessments (TIAs) that have been completed for all proposed allocations in collaboration with HCC. These generally reach a conclusion that: the individual sites in question will contribute to the overall settlement strategy; there are no concerns regarding delivering an LTP compliant scheme in terms of supporting all modes; and traffic impacts can be mitigated.

9.13.5 However, and just focusing on the eight 'broad location' allocations (i.e. the 'strategic' allocations other than HGC), there are some notable variations, with the TIAs highlighting:

- At four sites there are challenges in respect of active travel links to higher order destinations (Glinwell, West London Colney, West Redbourn, North Radlett).
- At six sites there is a need for further work on "how the site will connect into a settlement wide mitigation strategy... (North St Albans, East St Albans, Glinwell, NW and NE Harpenden, West Redbourn.
- North Radlett is associated with challenges;<sup>30</sup> however, there is good proximity to a train station (27 mins walking time, which is quicker than all of the other strategic sites bar NW Harpenden at 25 mins).

<sup>29</sup> The Infrastructure Delivery Plan (IDP) sets out infrastructure upgrades including those funded by developer contributions.

<sup>30</sup> The TIA for Harper Lane explains: "To be supportive of the allocation, direct high quality levels of permeability between the site and the settlement of Radlett will be needed, this would include measures such as fully lit and hard surfaced walking and cycling

9.13.6 In general, the TIAs demonstrate that detailed work has gone into considering transport infrastructure upgrades to be funded by all of the proposed allocations, but there remains scope for further work to demonstrate how upgrades will combine to deliver a strategy for settlements and the District as a whole.

9.13.7 With regards to aspects of the spatial strategy that are held constant across the scenarios in Section 6:

- **Hemel Garden Communities** – as discussed in Section 5.2, there is considered to be a significant transport-related opportunity. However, there is a need to distinguish between: A) inherent locational opportunities; and B) scheme-specific opportunities (given the scale and prominence of the scheme).<sup>31</sup>

With regards to **(A)**, key opportunities relate to: supporting aspirations for transformational upgrades to the A414 corridor between Watford and Harlow; the potential to walk and cycle to employment (at significantly expanded Maylands Estate); and the potential to connect to Hemel town centre and station via an extended Nickey Line. However, there is a need to recognise that the town centre is distant, and the train station further still (comparisons can be drawn with [Harlow and Gilston Garden Town](#)). With regards to **(B)**, the opportunity is clear, as set out in the [HGC Transport Vision and Strategy](#) (2024).

The goal is for 60% of trips starting, within and ending in the HGC Growth Areas and for 40% of trips starting, within and ending in the existing town of Hemel Hempstead to be by ‘sustainable’ modes by 2050. Detailed work is being undertaken to evidence the achievability of this goal, recognising that modal shift assumptions must feed into transport / traffic modelling. Achieving the mode share targets (as set out above) will be challenging, including recognising that a proportion of journeys to key destinations (Watford, Luton, Rothamsted Research, BRE) will be by car.

A final consideration is that support for HGC is important for Dacorum from a transport perspective, e.g. recognising that Berkhamsted is constrained in transport terms and Tring has limited train connectivity.

- **Other strategic allocations** (i.e. all other than East St Albans, which is discussed in Section 6) –
  - NW Harpenden – there are some inherent transport constraints at Harpenden, as discussed in Section 5.4, but this site is tentatively supported on transport grounds, given: proximity to Harpenden town centre and train station (also a fairly flat route); a near-adjacent local centre (with potential for enhancement); proximity to the Nickey Line; and the potential for upgraded cycle infrastructure in line with the [LCWIP](#) (although a segregated cycle route into the town centre is hampered by a railway bridge). However, the potential for a high proportion of southbound car journeys to pass through the town centre can be envisaged, and there are concerns in respect of rat-running along rural lanes, plus there is a need to consider in-combination impacts with other nearby non-strategic allocations.
  - North St Albans – does not give rise to any clear transport concern, given good connectivity to a top-tier settlement, plus reasonable connectivity to key destinations outside of the District. However, the train station is a 42 minute walk, opportunities appear fairly limited – primarily relating to enhanced cycle connectivity and support for key bus services – and the site is distant from the key A414 corridor.
 

A particular opportunity is in respect of a new cycle route along the A1081 between St Albans and Harpenden, which is a priority within the St Albans [LCWIP](#). The LCWIP discusses the cost of St Albans – Harpenden A1081 cycle infrastructure upgrades as being in the region of £15m, which is more than the funding available for the whole of Hertfordshire through the Government’s [Active Travel Fund](#) for the period 2020-2023. This serves to highlight the importance of developer funding (S106). Also, with regards to the A1081 as a cycle corridor, it is noted that the Harpenden Neighbourhood Plan states: *“St Albans City and District Council has provided a shared surface cycle and pedestrian route along the edge of the A1081. However, this route is limited in width and many cyclists use the road instead. A separate cycle route could provide a popular route in a similar style to the Nickey Line...”*
  - Glinwell (east of St Albans) – is relatively distant from St Albans city centre and train station, but well connected by bus and by an offroad cycle route. It is equally well-connected by bus and bike to Hatfield, such that the site benefits from reasonable or good accessibility to two high quality train lines. Finally, Oakland College is nearby, and the proposal is to deliver a new secondary school in this area.

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routes directly from the site Southwards into Radlett and through to the services and facilities within the settlement. However, the railway is likely to act as a barrier to movement from this site. Provision of active travel routes and access to bus stops on Watling St are key to maximising sustainability of this site.”

<sup>31</sup> By way of context, a [presentation](#) on HGC was first given to the St Albans Local Plan Advisory Group (LPAG) in November 2021. This emphasised the strategic transport challenges that would be faced by supporting growth in and around Hemel Hempstead in the absence of HGC (e.g. in terms of securing funding and achieving sufficient “focus” given “multiple existing strategies”). The presentation explained that growth at scale leads to inherent transport opportunities, and also discussed five “big moves” specific to HGC: 1) active travel; 2) interchanges; 3) HERT (discussed below); 4) bus network; and 5) future mobility.

- NE Harpenden – is somewhat peripheral to the town, and not located on an A-road corridor. However, it is in good proximity to a town centre and train station relative to some of the other options for growth around the town, and a recently opened secondary school is nearby. There is a need to consider the in-combination traffic effects of allocating this site alongside other allocations at Harpenden (all of which comprise land fully ‘recommended’ by the Green Belt Review), also mindful of car journeys from Redbourn and Wheathampstead to Harpenden. A further consideration is possible future expansion of Katherine Warington School, in support of growth at Harpenden, Redbourn and Wheathampstead).
- West Redbourn – there are access / transport challenges given the linear configuration of the site and limited current road access options. There is a clear argument for avoiding increased traffic along Lybury Lane, to the north, whilst access from the south potentially gives rise to a concern regarding traffic through the Redbourn Conservation Area. The site will be well-linked to HGC and is in relatively good proximity to a local centre, but Redbourn has no secondary school and little employment. Another point to note (also relevant to discussions under other headings) is Redbourn’s location within the 12.6km zone surrounding Ashridge Woods and Commons SSSI within which there is a requirement to ensure access to SANG and make financial contributions to SAMM, which could have implications for the funding that is available for transport infrastructure.
- West London Colney – London Colney is a lower order settlement (in comparison to St Albans and Harpenden), and there is no train connectivity (although Radlett Station is within ~5km by road; improved connectivity could be explored). However, there is very good access to the strategic road network and delivering a new secondary school is strongly supported from a transport perspective (although there will be a need for further work in respect of school traffic impacting London Colney).
- North Radlett – there are some notable transport and traffic issues, as discussed, but there will be potential to walk and cycle into Radlett, where there is a very good local offer and train service, and there are expected to be technical solutions that make the site suitable in transport and access terms. There is a need to consider in-combination impacts with growth at London Colney and elsewhere (including the Government permitted SFRI and potentially Bowmans Cross).
- Non-strategic allocations at St Albans and Harpenden:
  - St Albans – the package of four proposed allocations does not give rise to any concerns from a transport perspective, with the one site that is less well-connected having planning permission. Bedmond Lane is the most sensitive site in a number of respects, but does perform well in transport terms, with good links to the city centre, a neighbourhood centre, Verulamium Park and Hemel Hempstead / HGC (via the A4147, along which there is an ambition to deliver a new cycle route).
  - Harpenden – the equivalent appraisal in 2023 raised a concern with sites “at the southern extent of Harpenden” and also the proposed allocation at Gustard Wood. However, the situation has now improved, with a number of sites deleted from the plan.

The remaining sites give rise to limited concerns, including the two larger proposed sites to the west of the town, although there will be a need to consider traffic at junctions in-combination with NW Harpenden strategic site. Piggottshill Lane (29 homes) is challenging from an access perspective, but the site-specific policy states: *“Piggottshill Lane is narrow and cannot serve as the vehicle access route... Suitable access and design across land to the west of the site, including for pedestrians and cyclists, will need to be agreed with the County Council.”* It is recommended that careful consideration is given to the role of Piggottshill Lane as a walking and cycling route, including noting growth locations.

Finally, it is important to reiterate that TIAs have been completed for all proposed allocations. There does, however, remain space for more to be completed in respect of understanding how sites will deliver on settlement-wide transport strategies. As part of this, there is a need to recognise that there is reliance on smaller sites that could give rise to issues and opportunities in combination.

- **Green Belt PDL sites** – as discussed, at least two of these three proposed allocations are challenging in transport terms, in that it is difficult to envisage high rates of walking/cycling or public transport.
- **Urban PDL sites** – there is strong support for maximising urban supply, from a transport perspective, but a number of these sites have challenging access, and there is a need to note that a high proportion comprise current car parking. There is a need to balance a desire to reduce car parking in support of modal shift, with a recognition that ability to access town centres by car is important, particularly for those without a car or with mobility issues, and that problematic roadside parking must be avoided, including as it creates issues for safe walking/cycling and for effective bus services.



9.13.8 With regards to **development management policy**, numerous key policies have already been discussed under other headings. Further considerations include:

- Policy LG3 (Hemel Garden Communities Place Principles) – seeks to ensure measurable targets, requiring: *“Interventions to achieve a target of 60% of all journeys within the new Garden Town communities and 40% of all journeys across the existing town of Hemel Hempstead, to be undertaken by sustainable modes by 2050.”* As discussed, the 60% target is challenging and warrants ongoing scrutiny, as it modal shift assumptions will need to feed into transport / traffic modelling.

- Policy SP8 (Transport Strategy) – is a fairly standard policy, however, the approach of supporting a network of ‘local hubs’ appears to be tailored to the local context. The policy requires:

*“Supporting a network of local hubs at suitable locations such as railway stations and co-located in city, town and district centres where appropriate. The scale and nature of proposals must be appropriate to the size and function of the centre or station and proposals should contribute towards the vitality of a centre. A local hub should support sustainable travel and can include: a local bus service, car club facilities, bike repair service, e-bike charging, bike share facilities, ride hailing & ride sharing stop, real time and digital travel information, wifi and phone charging, parcel delivery storage lockers and public realm improvements. Local hubs should be supported by online presence and digital functionality.”*

- Policy TRA2 (Major Transport Schemes) – the proposed spatial strategy is considered to align reasonably well with long-term strategic transport objectives, but there is a need for ongoing scrutiny of whether growth is being directed with a view to supporting the HERT initiative. HCC commented through the consultation in 2023: *“The county council welcomes the inclusion of the HERT within this policy. More text may need to be considered/added regarding the HERT and how the local plan can support and establish a strong context for the HERT to come forward in future years...”*
- TRA4 (Parking) – in summary the policy requires: A) Meet car parking standards as set out in Appendix 1, taking into account the accessibility of the site to public transport and the nature of the use; B) Provide at least the cycle parking standards in Appendix 1; and C) Provide at least the disabled and inclusive parking standards in Appendix 1. HCC commented as follows in 2023: *“Parking levels have a significant influence on travel behaviours. Therefore maintaining or increasing levels of town centre parking conflicts with the ambitions of the local plan as they relate to increased use of sustainable transport options. Town centres are generally the most accessible areas by alternative (active/sustainable) modes of transport which should, in turn, lead to a requirement for less car parking... This policy could be reworded to ensure closer alignment with the Local Transport Plan...”* The response then went on to suggest that the policy should refer simply “maintaining” current levels of parking, as opposed to referring to “at least maintaining” current levels. Further consideration could be given to the HCC recommendation, and there is also an opportunity to ensure an integrated approach that takes account of the numerous proposed urban PDL allocations that comprise town centre parking (a number of which may retain some parking and/or deliver new multi storey parking on part of the site).

9.13.9 In conclusion, a **moderate or uncertain positive effect** is predicted on the baseline, as per the conclusion reached in 2023. In 2023 the equivalent appraisal conclusion notably stated: *“It should be possible to predict significant positive effects prior to plan finalisation after having accounted for consultation responses received, notably from the County Council. In particular, in light of consultation responses it should be possible to confirm the extent to which the Local Plan aligns with long term strategic transport objectives for the sub-region and wider region.”*

9.13.10 The conclusion now is that the broad strategy is considered to perform strongly, in light of consultation responses, the Modal Shift Study, traffic modelling and TIA work. This is of considerable importance for wide-ranging objectives including climate change mitigation, and transport is a key priority amongst local residents. It is also a focus of work underway through the South West Herts JSP (which supports growing connected places and a focus on transport corridors).

9.13.11 HGC is supported (but there is a need for further work), the plan broadly directs growth in line with the settlement hierarchy, there is a reasonable focus of growth at locations with good train and/or bus connectivity and a very strong alignment with the Local Cycling and Walking Infrastructure Plan (LCWIP). Also, providing for LHN in full is very important as unmet need creates major transport challenges.

9.13.12 There have also been some improvements to the plan since 2023, including an adjusted approach to non-strategic allocations in the north of the District. HCC raised some challenges through the consultation in 2023, but subsequently HCC and the District Council have collaborated on TIAs for all allocations. There is room for further work to set out a long term strategy for transport upgrades at all scales (sub-region, district, settlement, neighbourhood), such that there can be a good understanding of how allocations will deliver in combination in such a way that avoids issues and realises opportunities, but it is also important to ensure a proportionate approach as part of local plan-making.

## 9.14 Water

9.14.1 The appraisal in **Section 6** finds the proposed spatial strategy to perform well relative to higher growth alternatives. However, there is an element of uncertainty on account of evidence limitations. Neither Affinity Water (water supply) or Thames Water (wastewater) raised significant concerns through the consultation in 2023, but the Environment Agency requested further work to include a Water Cycle Study.

9.14.2 It is difficult to elaborate further on the appraisal in Section 6, but the following statement from the equivalent appraisal section in the ISA Report (2023) broadly still holds true:

“There is theoretical support for setting the housing requirement at LHN, with a view to early and effective planning for water infrastructure and the wider water environment (as opposed to generating unmet need that will then need to be provided for at locations unknown within a constrained sub-region). However, it could potentially be the case that there are particular constraints affecting St Albans, in terms of water quality and/or water resources. In particular, whilst early indications from Thames Water are that wastewater treatment capacity is not a constraint to the emerging growth strategy, this is a matter to be examined in further detail (or, at least, there is a need for a watching brief). The majority of wastewater from the St Albans region is treated at the Maple Lodge STW, south of Rickmansworth, and the treatment works is already operating at close to capacity and sometimes gets overwhelmed causing overflows... The Maple Lodge catchment is very large and covers multiple local authorities, so it is important that growth in St Albans is aligned with growth in the rest of the catchment area to avoid worsening... issues.”

9.14.3 Section 6 discusses the latest situation, in light of materials published by Thames Water (a Business Plan Price Review (PR) submitted to OfWAT and seemingly still in the process of being finalised at the time of writing; and a Drainage and Wastewater Management Plan) and discussions held in April 2024 as part of preparing the Local Plan Infrastructure Delivery Plan, but this is a complex situation, hence there is a need for clear statements on any issues/risks (also opportunities) from Thames Water. The consultation response received from Thames Water at the Draft Plan stage (2023) is available [here](#) (ref. 830).

9.14.4 With regards to development management policy:

- Strategic Policy SP9 (Utilities Infrastructure) states that: *“The Council requires and supports the programmed delivery of utilities infrastructure within the District to meet identified needs relating to water, wastewater, foul drainage, sewage treatment.... Early planning for full and effective provision of these utilities will be required...”* It is important to ensure that a suitably proactive approach is taken to strategic planning for wastewater treatment in particular, as opposed to dealing with matters at the DM stage.
- Policy CE1 (Promoting Sustainable Design, Construction and Building Efficiency) – requires: *“... water conservation, greywater recycling and storage facilities to reduce household water consumption to under 110 litres per person per day including external water use...”* This is the ‘optional’ higher standard allowed under Building Regulations, and is common practice, whilst some authorities nationally seek to justify a more stringent standard of 90 lpppd (e.g. Uttlesford) or even 85 lpppd (e.g. [Chichester](#); specifically in the northern part of the District, where there is a need to demonstrate water neutrality). However, there are significant development viability implications, and it is difficult to suggest what other policy area might be ‘flexed’ in order to create viability headroom to then allow for a more stringent approach to water efficiency. There is little reason to suggest compromising on affordable housing.

9.14.5 In conclusion, whilst the appraisal in 2023 concluded a ‘moderate or uncertain negative effect’ it is now considered appropriate to conclude a **neutral effect**, in light of limited concerns having been raised by the water companies through consultation. However, it is recognised that the Environment Agency has raised some concerns, and so it will be important to take careful account of representations received.

## 9.15 Conclusions

- 9.15.1 The whole plan appraisal presented above seeks to build upon the appraisal of Growth Scenario 3 presented in Section 6. The appraisal predicts a **positive effect** under five topics (Accessibility, Communities, Economy / employment, Homes and Transport), and in two cases (Accessibility and Economy / employment) it is possible to conclude that positive effect will be 'significant'.
- 9.15.2 Under the remaining topic headings the appraisal predicts a **neutral effect**, but that is not to say that the appraisal does not flag a range of specific issues and tensions with sustainability objectives under these headings. In particular, the overall conclusion of a neutral effect is marginal under the climate change mitigation and water headings. It is important to be clear that the appraisal is undertaken accounting for a baseline situation / no plan scenario which is assumed to involve considerable growth coming forward in a relatively unplanned manner under the presumption in favour of development.
- 9.15.3 There will be the potential to make improvements to the plan through the forthcoming examination in public. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to further explore tensions with sustainability objectives. As part of this, it may be possible to adjust the balance that has been struck in respect of DM policy requirements in the context of development viability, e.g. feasibly compromising on one objective in order to set more stringent policy requirements in support of another objective.
- 9.15.4 A small number of recommendations are made; however, it is inherently difficult to confidently make recommendations because actioning them will have implications that are difficult to foresee and account for here. For example, whilst it would be easy to recommend further policy stringency in respect of net zero development, this would have cost/viability implications such that there could be a need to accept trade-offs in respect of one or more wider objectives (e.g. affordable housing). Equally, whilst it would be easy to recommend further site-specific policy, there is always a risk of being overly prescriptive, such that there is reduced flexibility at the development management stage, potentially impacting delivery.
- 9.15.5 Finally, it should be noted that the current version of the Local Plan was prepared taking account of the appraisal presented within Section 9 of the Interim SA Report (2023). There is no requirement for SA to be iterative in this way, but it helps to demonstrate a robust and sound plan-making process.

### Cumulative effects

- 9.15.6 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects. The following bullet points cover some key considerations:
- **Housing needs** – progressing the St Albans Local Plan and providing for local housing needs (LHN) in full is strongly supported from a 'larger-than-local' perspective. Support for HGC is likely to be of crucial importance for the Dacorum Local Plan, and if the St Albans and Dacorum Local Plans are able to progress then the South West Herts JSP will be well placed to make progress and plan for longer term needs (alongside infrastructure). There is also a need to account for the emerging Hertsmere Local Plan, which includes a proposed new settlement at Bowmans Cross. Certainty in respect of the St Albans Local Plan could assist with progressing the Hertsmere Local Plan.
  - **The economy** – the proposed strategic employment allocation to the east of Hemel Hempstead is very strongly supported from a perspective of meeting employment land needs / realising economic growth and productivity objectives across the South West Herts sub-region.
  - **Transport corridors** – several strategic transport corridors pass through the area, but of particular note is the A414 corridor. The growth strategy should support aspirations for transformational change, with major enhancements supporting objectives for settlements / growth areas between Hemel Hempstead / Watford and Harlow (where there is a committed Garden Town). There is also a clear need to consider the M1 and, in this respect, National Highways are a key partner organisation.
  - **Internationally important biodiversity sites** – the key consideration is the Ashridge Woods and Commons SSSI component of the Chilterns Beechwoods SAC. Were HGC not to progress then it would likely prove very difficult for Dacorum to provide for housing needs alongside sufficient SANG.

- **The Chilterns NL** – HGC is in proximity, but this has been a focus of detailed work and concerns are overall limited, as discussed. Again, were HGC not to progress then there could be increased pressure on the National Landscape through the Dacorum Local Plan. There is also a need to note the Chilterns NL boundary review, which is likely to see the National Landscape extended into St Albans District.
- **Landscape scale nature recovery** – key cross-border growth-related opportunities are potentially in: A) the east of the District, i.e. the sensitive landscape gap between St Albans and Hatfield, albeit recognising that the emerging Welwyn Hatfield Local Plan proposes little growth in this area; B) the south / southeast of the District, mindful of the proposed series of new country parks set to be delivered alongside the Government permitted SRFI; and C) in the Bricket Wood area, given Bricket Wood Common SSSI and the River Colne corridor, and recognising close links to Watford. A Hertfordshire Local Nature Recovery Strategy is emerging but is not at a stage whereby it can inform the Local Plan.
- **Agricultural land** – self-sufficiency of food production is increasingly a key national consideration. Overall, it is not clear that St Albans is particularly constrained in the national context, hence there is support for providing for housing needs in full. Other nearby areas are overall more constrained.
- **Water resources** – this is a key larger-than-local issue, including given the very large catchment draining to Maple Lodge Sewage Treatment Works (STW). There is a need for coordination of growth across the catchment and with a long term perspective, working with Thames Water.
- **Hertsmere cross-border issues** – the St Albans / Hertsmere boundary area is quite densely populated, such that growth must be carefully managed, for example in terms of road traffic, maintaining settlement (Green Belt) gaps and strategic planning for green / blue infrastructure. London Colney abuts the boundary and is a higher order settlement in St Albans, such that it must naturally be considered as a location for significant growth through the Local Plan, including potentially with a view to delivering a secondary school that would also serve the north of Hertsmere. With regards to Hertsmere, a Duty to Cooperate meeting in 2021 discussed three potential strategic growth locations close to St Albans, most notably Bowmans Cross, which was then progressed to the Draft Hertsmere Local Plan. However, there is a clear need for further work in respect of avoiding/addressing cross-border issues and realising opportunities. One obvious consideration is the in combination impacts of growth on levels of traffic through London Colney and along Harper Lane. However, there are many other considerations, including realising strategic road, public transport and walking/cycling infrastructure opportunities.
- **The London Metropolitan Green Belt** – at the current time there is a considerable national debate regarding the future of Green Belt as a long-established designation (there are 14 Green Belts nationally, of which the London Metropolitan Green Belt is by far the largest). Regardless of how this debate progresses, there is a need to ensure a long term strategic perspective in respect of protecting undeveloped land between settlements. This will mean a targeted approach, that recognises that not all settlement gaps are as important as each other, having accounted for settlement character, landscape character and wide ranging other objectives (accounting for ecosystem services such as flood risk). It will be important not to ‘sleep walk’ into a situation whereby there is piecemeal loss of settlement gaps to the point where South West Hertfordshire becomes part of greater London. A graduated approach might be taken that accounts for defining features such as the Greater London / Hertfordshire boundary, the M25 and the A414, plus other key features such as the River Colne corridor. Looking 50 years hence there is a clear argument against allowing the north west London suburbs to stretch as far as St Albans.

## South West Hertfordshire 2050

### Our Vision for Realising our Potential



*There is a need for effective collaboration across SW Herts and more widely*

## **Part 3: What are the next steps?**

## 10 Plan finalisation

- 10.1.1 Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. The Council will also submit the SA Report.
- 10.1.2 At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.3 Once found to be 'sound' the Local Plan will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

## 11 Monitoring

- 11.1.1 Within the SA Report the requirement is to present "measures envisaged concerning monitoring".
- 11.1.2 The following are suggestions / ideas for monitoring, although it is recognised that, in practice, there is a need to balance ambition with time and resource implications:
- Biodiversity – there will be a need to establish a regime for ensuring that decision making in respect of biodiversity net gain as part of planning applications is undertaken under a strategic spatial framework – informed by the forthcoming Local Nature Recovery Strategy – and then monitor effectiveness.
  - Communities – there could be merit to targeted monitoring of growth/change at HGC. For example, incidences of residents commuting to work by active or public transport.
  - Community infrastructure – Wokingham Borough is commended as an authority that sets out very clear information on progress in respect of delivering infrastructure at strategic growth locations (see [here](#)).
  - Climate change mitigation – monitoring should focus on clarity. This can be a confusing policy area, but it is very important that the interested public can understand / engage and scrutinise applications.
  - Climate change adaptation – a focus on avoiding surface water flood zones could be considered but would likely prove challenging. Regardless, there is a need for clarity on the different forms of flood risk.
  - Economy and employment – the nature of need/demand for office floorspace and industrial/logistics floorspace changes very quickly. Regular monitoring of delivery would assist with future assessments.
  - Historic environment – it can be difficult to know what monitoring indicators are most appropriate to apply. What is quite typical is to monitor the number of assets on the Heritage at Risk register, but this will not give a good picture of the local plans impacts or contextual changes to the historic environment.
  - Homes – this topic is already a focus of the monitoring, but additional indicators could be explored, for example with figures broken down further by settlement and by housing type and tenure. Also, there is an increasing focus on tenure split for affordable housing, which might feed into monitoring. A focus on Gypsy and Traveller accommodation could also serve to inform future needs assessments.
  - Transport – there is a clear need for targeted detailed monitoring. As well as road traffic and air quality, there is a need for improved data on bus patronage and use of cycle routes. Also, understanding of strategic transport infrastructure issues and opportunities changes significantly over time (with work led by HCC), hence there is a need to consider local plan implications on an ongoing basis.
  - Water – there is a need for monitoring of the situation regarding wastewater treatment capacity and potentially also wider water quality. Also, there is a clear case for water efficiency standards achieved.

# Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

**Table A:** Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
<b>Introduction</b>	What's the plan seeking to achieve?		<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>	
<b>Part 2</b>	What are the SA findings at this current stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>	
<b>Part 3</b>	What happens next?	<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>	

**Table B: Interpreting Schedule 2 and linking the interpretation to the report structure**

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> <b>[Part 1 of the Report]</b>
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> <b>[Part 2 of the Report]</b>
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> <b>[Part 3 of the Report]</b>



**Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.**

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 7. With regards to explaining "how... considerations have been taken into account", Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Sections 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside the Proposed Submission Local Plan in order to inform representations and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan for publication (see Section 10). Also, it should be noted that an Interim SA Report was published alongside the Draft Local Plan in 2023. It presented the information required of the SA Report.

# Appendix II: The SA scope

## Introduction

The aim of this appendix is to supplement Section 3, which presents the SA framework. Specifically, for each of the topic headings that are at the core of the framework, the aim is to present a brief discussion of key issues. Each discussion does not aim to be comprehensive but aims to give a flavour of the key issues of relevance to the appraisal, given the broad scope of the plan and reasonable alternatives. The discussions are mostly unchanged from the ISA Report (2023) which itself built upon discussions of key issues in the Scoping Report (2021).

## Accessibility

Access to **community infrastructure** is invariably a key issue for local plan-making. There is a need to avoid undue strain on existing infrastructure, including by delivering new and upgraded infrastructure alongside housing growth, and ideally deliver ‘planning gain’ to the benefit of the local community (e.g. settlement) as a whole. Spatial strategy and site selection / consideration of growth scenarios is a key means of addressing issues and realising opportunities, plus there is an important role for policy (district-wide and site-specific) and masterplanning.

Community infrastructure is a **broad term**, and there is cross-over with considerations that factor-in under other topic headings; for example, green / blue infrastructure and infrastructure relating to health and active travel. There are various approaches that might be taken to categorising infrastructure, but there is arguably a key distinction between **strategic** (e.g. a secondary school, leisure centre or health campus) and **local** (e.g. a primary school, or a new community hub for a village). **Schools** capacity is quite often a key issue for local plans, and the St Albans Local Plan is no exception. However, planning for schools capacity is challenging due to the nature of school place projections, due to parental choice (such that parents will often choose to send children to a school further afield) and because of the free schools system. One issue nationally, at the current time, is recent low birth rates leading to issues with maintaining school rolls at some primary schools, but it is not clear that this is an issue locally.

From a review of the Scoping Report (2021) and consultation responses, specific **key issues also include**:

- The city, town and district centres – locally are naturally key hubs for community infrastructure but may also warrant being a focus of discussion under the ‘economy’ heading. Centres locally broadly appeared resilient pre Covid 19 but there are indications of increased vacancy rates.
- Health and wellbeing – is a focus of stand-alone consideration below, but clearly relates closely to ‘access to community infrastructure’. The district performs well across a wide range of monitoring indicators, but there are nonetheless inequalities locally, including spatial inequalities that might be addressed through the Plan.
- High speed broadband – in theory might be considered under the ‘accessibility’ heading (also economy). However, in practice it is difficult to draw a strong link between local plan strategy / site selection and policy on the one hand and delivery of high speed broadband on the other.

## Air and wider environmental quality

A priority issue is addressing poor air quality in known hotspots. This primarily means air quality management areas (**AQMAs**), of which there is one in the District and others located fairly nearby (see map of AQMAs [here](#)). However, there is also a need to remain alive to data serving to identify air quality hotspots other than AQMAs. Spatial strategy / site selection is a key opportunity to minimise and potentially reduce **traffic** (the key source of air pollution), plus there is an important role for policy (district-wide and site-specific) and masterplanning.

Air pollution from traffic has decreased rapidly over recent years and is set to decrease much further due to the national switch-over to **electric vehicles** (EVs). However, the trend to EVs has begun to slow recently, such that the timetable remains uncertain. Also, air pollution will remain an issue even following the switchover, as EVs are heavier vehicles that lead to high levels of particulate pollution from brake, tyre and road wear.

Finally, it is important to also consider ‘wider environmental quality’ issues, particularly **noise pollution**. This is largely an issue that is dealt with effectively through ‘the market’ (because house buyers will typically be aware of sources of noise), but this is not entirely the case. As such, there is a need to scrutinise proposals to direct new housing to locations that might historically have been seen as less appropriate for housing due to noise pollution.

## Biodiversity

A clear starting point is the hierarchy of **designated sites** locally, each of which will be associated with known sensitivities/issues, or issues that can be safely inferred given knowledge of the habitats present. Specific key issues are explored in detail in the appraisal sections of this report; however, it is important to note here that an effective approach to planning for biodiversity involves considering issues/opportunities at **landscape scales**, where a landscape is defined as a collection of key sites / areas of valued habitat *and the intervening landscape*.

As part of this, there is a need to support ecological networks / functional connectivity between habitat patches, including with a view to enabling species populations to respond to pressures including climate change. River and stream corridors are a key 'landscape scale' at which to plan for biodiversity (alongside associated ecosystem services, such as flood risk management, recreational uses and heritage value), but others can also be identified, often linking closely to landscape character areas. It is anticipated that the forthcoming **Local Nature Recovery Strategy** (LNRS; a requirement under the Environment Act) will assist with identifying landscape-scale priorities.

Finally, there is a need consider the other key requirement under the Environment Act, which is a requirement for development to deliver a mandatory 10% **biodiversity net gain**, as measured using the Defra Biodiversity Metric. Biodiversity Net Gain is primarily a matter for the planning application stage; however, there is a need for a strategic approach. The Hertfordshire Local Nature Recovery Strategy (LNRS) will assist with this.

Another matter for the local plan is the question of whether policy might require biodiversity net gain over-and-above the 10% legal requirement, whether that be for all sites district-wide or for certain sites.

From a review of the Scoping Report (2021) and consultation responses, specific **key issues also include**:

- Key / indicator species – can be a consideration, but typically it is appropriate to focus attention on habitats and areas associated with a high density of valued habitat or otherwise known to be of biodiversity importance.
- Monitoring – the extent and status of key habitats is important, but it is unlikely that it will be possible to identify a causal link between any change in monitoring status and the Local Plan as part of the SA process. It is important to note that two SSSIs locally are partially or wholly in unfavourable condition, but the Local Plan is far from the only mechanism for addressing this.

## Climate change adaptation

A key issue for local plans is invariably **flood risk**. This is a key 'adaptation' consideration, including given the impacts of flooding, and mindful of the uncertainties around climate change projections. Mapped data showing the location of nationally identified fluvial and surface water flood zones is available [here](#).

Aside from flood risk there are wide ranging climate change adaptation considerations that warrant being a focus of local plan-making, including the key task of spatial strategy and site selection / consideration of growth scenarios. Indeed, climate change adaptation is a **cross-cutting** issue that must factor-in as part of the appraisal under all topics, but most notably biodiversity (including supporting ecological connectivity / networks), communities/health (including over-heating risk) and water (droughts and heatwaves place stress on the water environment).

## Climate change mitigation

SADC has committed to an ambitious target of achieving **net zero** carbon emissions district-wide by 2030. This is on par with the most ambitious targets nationally, with only a small number of urban authorities having committed to an earlier target date. In light of this target, the key wording within the NPPF undoubtedly applies strongly, namely: "*The planning system should... help to... shape places in ways that contribute to **radical reductions in greenhouse gas emissions**...*" [emphasis added].

Also, there is a need to consider that, whilst the local net zero target is important, what is arguably more important is **per person ('per capita') emissions**. What this means in practice is that it is difficult – and arguably inappropriate – to argue for lower housing growth in St Albans on the basis that this would assist with meeting the local 2030 net zero target. This reflects the fact that not meeting housing needs locally would lead to A) continued inability for new households to form / concealed households / overcrowding, which is something that is difficult to argue in favour of (albeit there might be some positive effects for greenhouse gas emissions); and/or B) unmet housing need locally that is met elsewhere (with no net effect in terms of the number of new homes nationally).

When considering climate change mitigation / decarbonisation through local plans it is important to ensure suitably structured / systematic consideration of the **various sources of greenhouse gas emissions**. A conceptual framework is called for, under which there is a top-level distinction between emissions from A) the built environment (particularly new build development, which is overwhelmingly the focus); and B) transport (recalling that there is a 'transport' heading below). Further categorisation of emissions is discussed in the main report.

From a review of the Scoping Report (2021) and consultation responses, specific **key issues also include**:

- Renewable energy – a key focus is maximising delivery localised heat and/or power generation (although not combined heat and power, CHP). However, another potential issue for local plans is in respect of a policy framework to guide planning applications / support delivery of large-scale, stand-alone renewable power schemes, which primarily means solar farms, in the St Albans context.
- Building Regulations – minimum greenhouse gas emissions standards, as required under the Building Regulations, are in the process of being tightened to a Future Homes Standard. However, there remains the potential for local plan policy to require emissions standards that go beyond the minimum requirement. As part of this, there is the potential to require 'net zero' development, although this is a term that must be carefully defined (there has recently been good progress made nationally, including through recently adopted local plans for Cornwall and Bath / North East Somerset). A key issue is invariably the extent to which there is flexibility for offsetting (or, in other words, the extent to which net zero must be achieved onsite), and also the extent to which there is flexibility to achieve an emissions standard that falls short of net zero for viability reasons.

## Communities and health

This topic heading offers an opportunity to consider **wide-ranging issues** over-and-above the key issue of accessibility to community infrastructure. Access to open space, sports facilities, green and blue infrastructure, active travel infrastructure and high quality / accessible countryside can appropriately be a focus of discussion under this topic heading, although there are clear cross-overs with other topic headings. Other matters that could potentially be a focus of appraisal (dependent on the nature of plan proposals/options) include:

- supporting the vitality and viability of existing centres and rural communities;
- health and safety considerations (including road safety);
- integrating communities and supporting wide-ranging equalities objectives;
- delivering high quality place-making; and
- minimising the negative effects of development, e.g. relating to construction and traffic congestion.

## Economy

As with housing, a key priority issue is invariably **providing for need** as far as is consistent with sustainable development. However, understanding need/demand for new employment land can be quite complex, including as there is a need to take into account a range of specific types of need (e.g. industrial versus office space), account for loss of employment land to housing (including under permitted development) and 'churn' within existing employment land (i.e. existing employment land being repurposed and potentially intensified).

Furthermore, there is a need to consider long term strategy for employment growth, the effect of employment clusters / agglomerations, the extent to which demand for employment space is 'footloose' (e.g. where it might be provided for anywhere within a broad area to the same effect) and the importance of balancing housing and employment growth, with a view to minimising longer distance commuting by road.

South West Herts as a **Functional Economic Market Area** and a need study has recently been completed. A key priority is supporting objectives for Herts IQ, which is a regionally or even nationally important cluster associated with high productivity knowledge sector jobs.

Beyond ensuring sufficient employment land, another key consideration is supporting the viability of centres as hubs of economic activity, most notably St Albans city centre but also the other higher order centres in the district.

## Historic environment

As per the discussion above under biodiversity, the starting point is the range of **designated assets** of varying significance. However, beyond this, there is a need to consider how assets relate to one another and the surrounding landscape, including via considering the **'setting'** of designated assets. There is often a need to consider why assets are located where they are, and what is revealed by patterns of assets across an area. Having taken these steps, it can be possible to take a positive indeed proactive approach to conservation of the historic environment that is supportive of local character, sense of place (including 'time depth') and place-making.

**Methodological approaches** to appraising reasonable alternative growth scenarios, and the draft plan as a whole, in terms of the historic environment, are quite well established. The appraisal sections of this report present a suitably systematic appraisal. However, Historic England's consultation response received in 2021 also requested detailed work as part of the process of defining reasonable alternative growth scenarios, including as part of work to sift / shortlist available site options. This is a reasonable request; however, there is also a need to ensure proportionality. See further discussion in Section 5 (Defining reasonable growth scenarios).

Finally, there is a clear need to note the particular importance of St Albans City Centre. As set out within the Scoping Report (2021): *"A new Local Plan will provide an opportunity for framing new policy around the future management of clusters of heritage assets such as St Albans city centre."*

## Housing

Headline considerations are in respect of setting the **housing requirement** and also policy on **affordable housing** (i.e. the question of the extent to which affordable housing is prioritised alongside other policy 'asks' of developers, in the context of development viability considerations, i.e. limitations on available developer contributions / funding).

Beyond this, there is a need to consider the specific nature of the proposed **supply**, including in terms of whether the effect will be to support a good mix of housing, in terms of type, size, tenure and location, and also in terms of delivery risk (there is invariably a need to identify a total supply that exceeds the requirement, given the inevitability of unforeseen delivery issues at the planning application stage and/or post planning permission being granted).

Specialist housing is another key consideration, as is providing for **Gypsy and Traveller accommodation needs**. Further considerations include space standards and also the adaptability of housing, e.g. for those with disabilities.

## Landscape

Whilst there are no nationally designated landscapes in the district, there are well understood **landscape character areas**, each associated with distinct characteristics, to be protected and potentially enhanced.

It is difficult to confidently differentiate between character areas – or landscape parcels of any scale – in terms of value or **sensitivity**; however, various factors can be taken into account to give an indication. These include: links to settlement, including settlement form, particularly historic settlement form; topography and 'enclosing' vegetation, given that longer distance views will tend to be valued; links to valued historic environment and biodiversity assets; and accessibility, including views from key locations, roads and public rights of way.

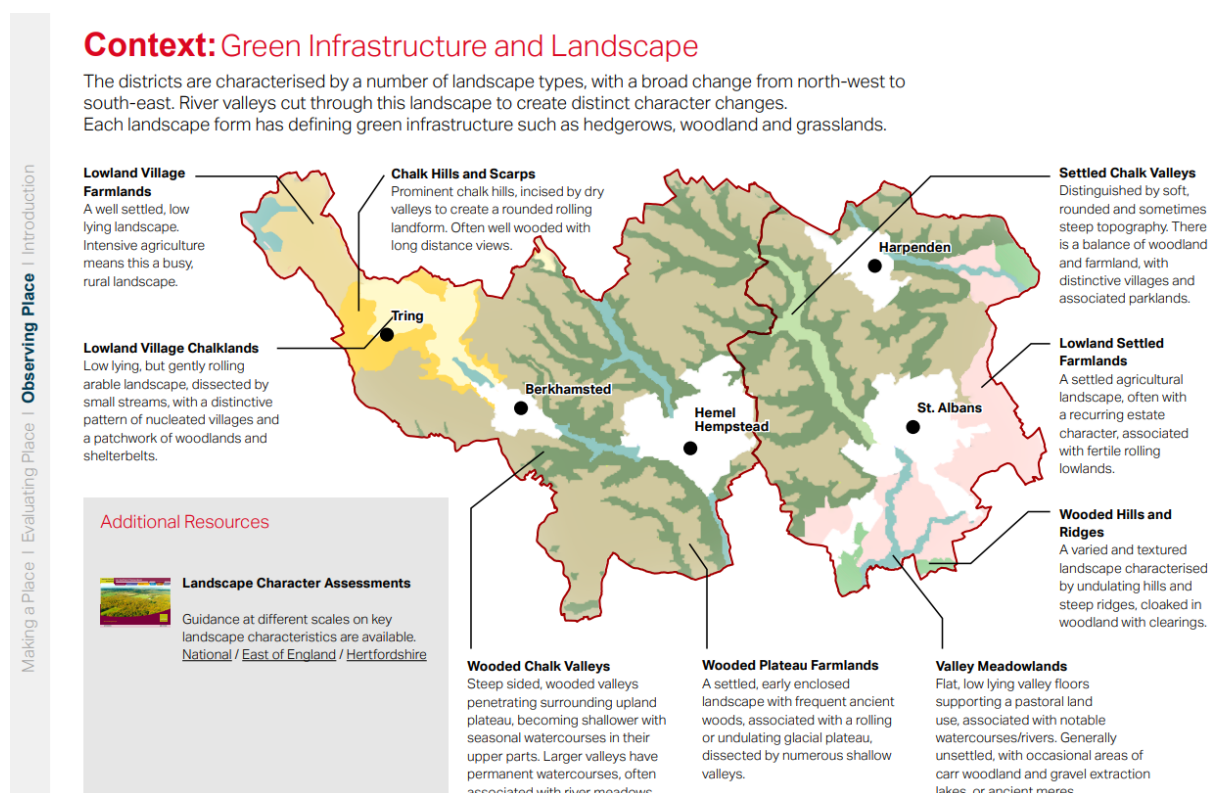
There is also a need to consider landscape with a long-term perspective, given clear arguments for planning comprehensively as opposed to opening the door to future development creep, or **'sprawl'** (although there can also be arguments for enabling settlements and communities to expand organically over time).

There is also a need to be mindful of evidence generated by the Stage 2 **Green Belt Review** (2023), albeit with utmost caution, as Green Belt is not a landscape designation (rather, the Green Belt has five very clearly defined purposes). In particular: the identified Green Belt parcels may have some correlation with landscape character areas; and several of the defined Green Belt purposes clearly have some links to landscape.

A final consideration – as reported in the Scoping Report (2021) – is the need to be mindful that growth in the west of the district does link quite closely to the **Chilterns National Landscape** (NL, formerly AONB), hence there is a need to be mindful of issues / sensitivities, including recreational pressure on key sites and potentially traffic along rural lanes that might be popular routes for cyclists and horse riders. A boundary review is currently underway, and indications are that there is a likelihood of the National Landscape being extended into the District.

**N.B.** with regards to landscape (also historic environment and biodiversity) a range of helpful maps are presented within the St Albans Strategic Sites Design Guidance (2023), available at: [www.stalbans.gov.uk/evidence-base](http://www.stalbans.gov.uk/evidence-base).

**Figure A:** An extract from the St Albans Strategic Sites Design Guidance (2023)



## Soils / resources

A clear priority is avoiding the loss of productive **agricultural land**, particularly that which is defined as ‘best and most versatile’, which is defined as that which is of grade 1, grade 2 or grade 3a quality. However, data availability is a barrier, as the nationally available dataset is very low resolution (and does not differentiate between grades 3a and 3b) whilst the available dataset showing agricultural land quality with a high degree of accuracy (following fieldwork) is very patchy. In this light, site promoters are encouraged to submit evidence on land quality.

Aside from agricultural land quality, it can be difficult to reach strong conclusions on the effects of local plans on ‘resources’ more widely. However, one immediate consideration is the need to support the objectives of **minerals and waste** planning, which is led locally by the County Council. As part of this, a key consideration is often avoiding the undue sterilisation of known minerals resources that might have the potential to be viably extracted.

Another consideration is avoiding issues with **contaminated land**, and ideally directing growth in such a way that supports the remediation of contaminated land. This is a significant issue locally, including as there is extensive land in the south of the Borough that comprises historic landfill (subsequent to sand and gravel quarrying).

Also, a subject that is increasingly recognised nationally and internationally as being of key importance is minimising ‘non-operational’ built environment greenhouse gas emissions, in particular the **embodied emissions** in construction materials. The implication is a need to seek to reuse buildings (at least their steel and concrete ‘super structure’) ahead of demolition and rebuild is increasingly seen as a climate change mitigation priority. Equally, there is a new focus on designing and constructing buildings with a view to future repurposing, i.e. seeking to avoid or delay the need for future demolition. This approach is in line with ‘circular economy’ principles.

## Transport

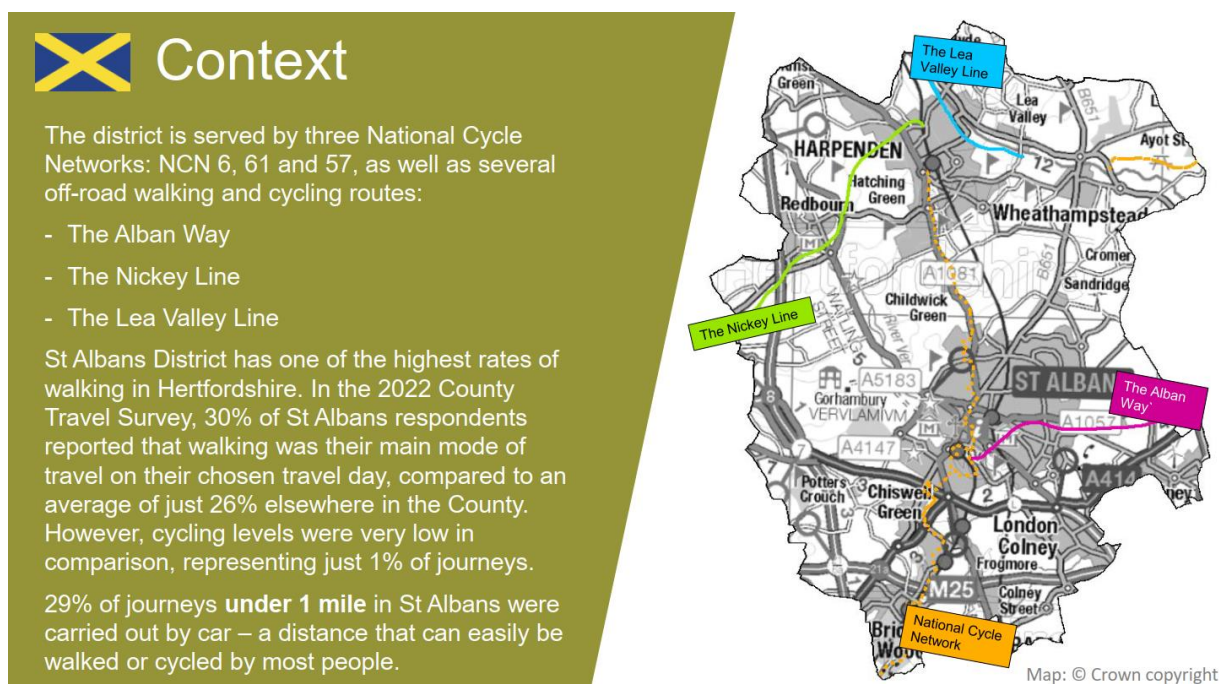
This is a **key issue** locally from a range of perspectives, including climate change mitigation, traffic congestion, health and wellbeing, the historic environment and the economy. There is a need to direct growth to the most accessible and best-connected locations, particularly those that are well-connected in terms of public and active transport. Also, there is a need to support specific strategic transport objectives, including as established at sub-regional scales, and including in terms of directing growth so as to deliver or facilitate delivery of new strategic transport infrastructure (e.g. new cycle routes or road/junction upgrades in support of bus connectivity).

Other considerations include:

- **Local Cycling and Walking Infrastructure Plan (LCWIP)** – is now available to inform the Local Plan and is a key factor when giving consideration to strategy / site selection and site specific policy requirements.
- **SW Herts South West Herts Joint Strategic Plan (JSP)** – the option of focusing growth along transport corridors was found to perform strongly through a recent consultation and the option of ‘growing the best-connected places’ also performed well. Growing the best-connected places could mean an overwhelming focus on Hemel Hempstead, St Albans and Harpenden or, alternatively, distributing growth in accordance with the settlement hierarchy. Also, there is a need to recognise that settlements function in clusters. This is recognised in the NPPF (para 79) and applies quite strongly in both the north and the south of St Albans District.
- **A414 and Mass Rapid Transit (MRT)** – discussion of strategic opportunities / options for the A414 corridor, including a possible Hertfordshire Essex Mass Rapid Transport (HERT) has been ongoing for several years. There was then a presentation to LPAG in [September 2021](#), which emphasised the links between HERT and the wider A414 strategy, as well as complexities and challenges associated with realising scheme objectives. The project then hit a milestone in late 2021, when there was an initial consultation; however, no significant progress has been reported since that time. The initial consultation covered: need and benefits of the HERT; principles including the vision and potential key features; current travel behaviours and the possible trips that could be made using the HERT; and towns and interchanges the HERT could serve, stretching to Harlow.
- **Other transport priorities** – there is clearly a need to support accessibility to the two mainline train stations, and the Abbey Line also provides important connectivity to Watford, with a need to support patronage. There are also key bus services to account for as part of spatial strategy and site selection, including with a view to supporting and potentially enhancing services; this includes key north / south and east / west routes through St Albans. There is also a good network of cycle infrastructure locally, including two offroad routes along former railways, with significant opportunities for enhancement. Finally, an important transport consideration is the need to account for increased HGV movements as a result of the Government-permitted SRFI.
- **Strategic growth locations** – can tend to have merit from a transport perspective over-and-above a strategy that involves ‘dispersing’ an equivalent number of new homes across smaller sites. This is because strategic growth locations can support a degree of self-containment / internalisation and can deliver new strategic transport infrastructure. However, there can also be a traffic argument for dispersal across road corridors.
- **Modelling** – to understand movement and traffic flows as a result of proposed growth / growth scenarios is an expectation as part of local plan-making. However, modelling can prove costly and time-consuming, such that modelling growth scenarios is not common practice. Ahead of detailed evidence from modelling there is a need to make cautious but pragmatic assumptions regarding movement and traffic flows and, in turn, consider potential issues and opportunities. Within the District there is quite good understanding of key traffic hotspots.

Finally, the **Hertfordshire Active Travel Strategy** is noted as a key source of evidence. Whilst the strategy seeks to address Active Travel across the whole county, there is a particular focus on:

- **Short journeys:** With over 56% of all trips under five miles or less, there is a significant amount of journeys in Hertfordshire that currently take place by private car which could be undertaken by cycling or walking.
- **Urban congestion:** Congestion is a significant issue in urban areas, with Watford, and could increase by 20.9% by 2031, based on 2011 levels.
- **Active Travel for Schools:** Whilst 51% of children walk to nursery or primary school, and 47% walk to secondary school, cycling only accounts for 3% of secondary school trips. Furthermore, in some parts of Hertfordshire, over 23% of children are classified as obese.

**Figure B:** Extracts from the St Albans LCWIP Executive Summary

## Water

The Environment Agency (EA) submitted a detailed consultation response in 2021, setting out their views on key issues locally, and also commented in detail on the Draft Local Plan in 2023 (ref 426). Both of the water companies also responded (Thames Water, ref 830; Affinity Water, ref 767) but with fewer implications for plan-making.

It is also clearly the case that both **water availability** (i.e. low levels/flows affecting water availability and habitats) and **water quality** (within water bodies failing Water Framework Directive objectives and at valued biodiversity sites susceptible to nutrient enrichment) have been high on the agenda nationally over recent years.

With regards to water supply, a key issue is designing buildings such that they support high levels of water efficiency (e.g. 100 litres per person per day). With regards to water quality, a key issue is in respect of taking account of any known issues at wastewater treatment works (in terms of ability to receive / treat additional flows) and also accounting for the implications of local geology for Sustainable Drainage Systems (SuDS).

Other key information on water quality is available via the EA's [online mapping resource](#), which notably highlights: Ecological status of rivers – the Rivers Ver, Lee and Colne through the district are assigned 'moderate' status, but the River Colne is assigned 'poor' status south of its confluence with the Ver at Bricket Wood; Quantitative status of groundwater – both the Mid-Chilterns Chalk and the Upper Lee Chalk aquifers are assigned 'poor' status; and Chalk streams – the location of chalk streams across the region is shown.

As well as the quality of rivers, there is also a need to consider groundwater, with the EA helpfully having set out the potential scope of issues as follows:

*“Groundwater is a precious resource within the area, providing drinking water and a source for the borough’s chalk streams and therefore must be protected. New development could result in the pollution, especially for sites situated in vulnerable groundwater areas with Source Protection Zones (SPZ) or on principal or secondary aquifers. In particular, sites where the previous land use suggests the potential presence of contamination or the proposed land use is potentially contaminative will need to be dealt with in a way which protects the underlying groundwater.”*



# Appendix III: Growth quanta

## Introduction

The aim of this appendix is to supplement the discussion presented in Section 5.2, which introduces 'top down' / strategic factors with a bearing on work to define reasonable alternative growth scenarios.

Specifically, this appendix presents an appraisal of four housing requirement (or 'growth quanta') alternatives:

- 300 dpa (the approximate figure that could be provided for without greenfield Green Belt release)
- 600 dpa (a low growth scenario that might be considered in order to reflect Green Belt constraint)
- 900 dpa (a figure suitably close to standard method LHN)
- 1,200 dpa (a reasonable high growth 'bookend' for testing)

It is important to be clear that this is a high level appraisal of alternative 'numbers' with no / minimal assumptions made regarding broad spatial strategy or specific site allocations. It is undertaken as **an early step** in the process of defining reasonable alternatives (in the form of 'growth scenarios') for formal appraisal and consultation. Specifically, it is an early step in the process set out in Section 5 of this report.

## Appraisal methodology

The appraisal is presented in a table below that includes: a **column** for each of the alternatives; and a **row** for each of the 13 sustainability topic headings that together comprise the core of the SA framework (Section 3).

Within each row the aim is to:

- **rank** the alternatives in order of performance (with a star indicating best performing; "=" indicating broadly equal performance; and "?" indicating an inability to reach a conclusion); and then
- **categorise** performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.<sup>32</sup>

The table is followed by a discussion, explaining reasons for the ranking and predicted effects.

Further methodological points are as follows:

- It is inherently challenging to reach conclusions with any confidence due to the high-level nature of the alternatives, i.e. given no or minimal assumptions regarding broad spatial strategy or specific site allocations.
- A key assumption is that lower housing growth in St Albans would lead to increased pressure for housing growth elsewhere within a constrained sub-region. However, in practice, there is little certainty.

## Appraisal findings

The table below present a summary of the appraisal of reasonable growth scenarios presented above. To reiterate, within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence); and then **2**) categorise performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.

**N.B.** it is not considered appropriate to simply conclude a preference for lower growth from wide-ranging environmental perspectives, despite the fact that housing growth inevitably leads to environmental impacts. This reflects an assumption that unmet need would have to be provided for elsewhere within a constrained sub-region, and it is not always possible to conclude that St Albans is particularly constrained in the sub-regional context.

<sup>32</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

**Table A:** High level appraisal of growth quanta (housing requirement) alternatives

Topic	300 dpa	600 dpa	900 dpa	1,200 dpa
	Rank of preference (number) and categorisation of effects (shading)			
Accessibility	4	3	★1	2
Air and env quality	3	2	★1	3
Biodiversity	2	★1	★1	2
Climate change adaptation	2	2	★1	2
Climate change mitigation	4	3	★1	2
Communities and health	4	3	★1	2
Economy	3	2	★1	2
Historic environment	2	★1	2	3
Housing	4	3	2	★1
Landscape	3	2	★1	3
Soils / resources	3	2	★1	2
Transport	4	3	★1	2
Water	2	2	★1	2

### Summary discussion

The appraisal finds that 900 dpa is preferable in respect of more topics than any of the other scenarios and is also associated with a good number of predicted positive effects (specifically, to ‘moderate or uncertain’ positives) and the fewest negatives (indeed, no negatives of any significance are predicted).

However, it does not necessarily follow that 900 dpa is best performing overall, or ‘most sustainable’. This is primarily because the appraisal is undertaken without any assumptions regarding the degree of importance, or ‘weight’ in the decision-making process, that should be assigned to each of the topics that together comprise the SA framework. The appraisal finds an alternative scenario to outperform 900 dpa under two topic headings, and the Council – as decision-makers – might choose to assign particular weight to one or both of these.

A second immediate point to note is that 300 dpa is shown to perform worst, or equal worst, under all of the SA topics. This is a strong indication that this growth quanta scenario performs poorly overall and is perhaps even ‘unreasonable’. However, again, it is only the Council that can arrive at a conclusion in this respect. There will be many factors to weigh in the balance other than those taken into account through this high-level appraisal.

A third introductory point to make is that the summary findings set out in the Table A are unchanged from 2023.

Having made these introductory remarks, the following bullet points consider each of the topics in turn:

- **Accessibility (to community infrastructure)** – a key consideration here is supporting one or more strategic growth locations where community infrastructure is delivered alongside housing, in order to ‘consume the smoke’ of the new community and potentially also address existing issues / identified opportunities.

A 900 dpa scenario would ensure that the choice, in respect of the balance between strategic and non-strategic growth locations, is in the hands of SADC, as opposed to passing the decision on to another LPA tasked with meeting unmet needs (as well as their own needs) under the 600 dpa and 300 dpa scenarios.

With regards to the 1,200 dpa scenario, the District’s capacity to support strategic growth locations could be reached, such that there is a need to deliver a large number of non-strategic growth locations, with resulting pressure on existing community infrastructure. This conclusion cannot be reached with any certainty, but the fact is that there is a limit to the level of work that has been undertaken to explore strategic site options.

With regards to effect significance, there are identified growth-related infrastructure opportunities locally, most notably in respect of secondary schools capacity, which might go unrealised under lower growth scenarios.

- **Air and wider environmental quality** – focusing on the location of air quality management areas ([AQMAs](#)) across the sub-region (particularly those relating to non-motorway traffic), there is reason to suggest that St Albans is subject to notable constraint, particularly noting the AQMA affecting St Albans High Street.

In turn, there are significant concerns with a 1,200 home dpa scenario, and a further consideration is potentially pressure to support growth locations adjacent to major roads or railways (which could lead to concerns in respect of noise as well as air pollution). However, concerns are tempered on account of the national switch-over to electric vehicles (EVs; see further discussion in Appendix II, above).

With regards to the question of whether the housing requirement should be set at LHN (850 dpa) or a lower figure, there are four further factors. Firstly, there is a need to recognise that exporting unmet need may well lead to increased car-miles, e.g. as residents commute further to work. Secondly, growth in St Albans could well unlock or facilitate delivery of strategic transport infrastructure upgrades, e.g. the A414 corridor strategy. Thirdly, as per the discussion under ‘accessibility’, there are ‘sustainable transport’ arguments for supporting strategic growth locations, e.g. masterplanning for ‘[walkable neighbourhoods](#)’. Finally, there is a need to consider a high density of AQMAs within local authorities directly abutting the North London Boroughs, as well as a blanket AQMA covering the North London Boroughs themselves.

- **Biodiversity** – it is difficult to conclude that St Albans is subject to relatively high constraint in the sub-regional context. However, on the other hand, it is difficult to envisage ‘biodiversity’ arguments for St Albans receiving unmet needs elsewhere, including given the issue of recreational pressure on the Chilterns Beechwoods SAC. With regards to Dacorum, whilst the whole District is affected by the Chilterns Beechwoods SAC constraint, there has been good progress on identifying SANG solutions / strategy; and whilst the part of the District within the National Landscape is constrained in wider (non-SAC) respects, there are parts of the District that are subject to relatively low constraint. With regards to Welwyn Hatfield, the Borough is constrained by other SAC woodlands, but issues have been explored and resolved through their plan-making / HRA process.

On the question of a very low growth scenario (300 dpa), a concern might be that there would be pressure for a focus of growth within the narrow band of non-Green Belt between Luton and Stevenage, where there is a high density of ancient woodland and wood pasture priority habitat. Also, as per the discussion under ‘accessibility’, there could be pressure for authorities receiving unmet needs to disperse growth widely across smaller sites, potentially leading to opportunities missed in respect of strategic growth-related enhancements / interventions, e.g. targeted at delivering on a Hertfordshire Local Nature Recovery Strategy (LNRS).

Finally, on the matter of significant effects, it is difficult to reach strong conclusions at this stage, primarily on account of the high-level nature of the scenarios, but also given the requirement in the Environment Act to deliver 10% biodiversity net gain (with the potential to require a higher percentage figure through policy).

- **Climate change adaptation** – the District does not stand-out as being subject to particular flood risk constraint, in the sub-regional context. However, on the other hand, it is difficult to envisage flood risk being suggested as a reason for St Albans receiving unmet need from elsewhere. Under a higher growth scenario there could potentially be increased pressure to deliver new homes in locations affected by a degree of flood risk, and higher density development potentially susceptible to overheating is another consideration.
- **Climate change mitigation** – focusing on built-environment decarbonisation, key considerations are the need to direct growth to strategic growth locations; locations where there is the potential for higher density (and ideally mixed use) development; and locations with strong development viability. There are clear opportunities locally in at least two of these respects, hence there is a built environment decarbonisation argument for providing for housing needs in full locally. Also, there may be an opportunity locally in respect of supporting modern methods of construction, in support of minimising non-operational built environment emissions (e.g. embodied carbon in construction materials). There is a need for proactive strategic planning for built environment decarbonisation, as opposed to exporting unmet needs to locations unknown.
- **Communities** – it is recognised that there may be concerns regarding growth quantum among some members of the local community. However, local concerns must be considered in the sub-regional context. For example, there is a need to recognise that without HGC there would be greatly increased pressure for strategic and non-strategic urban extensions, whether within St Albans or elsewhere. It is also important to recall that any unmet needs generated would need to be met as close to St Albans as possible.
- **Economy** – there is clear support for setting the housing requirement at LHN, whilst high growth could worsen the current existing issue of high levels of out commuting. St Albans is home to two of Hertfordshire's main research and innovation assets in the Building Research Establishment (BRE) and Rothamsted Research, plus St Albans is a thriving location for office-based businesses, plus there is an opportunity to deliver a strategic expansion of Maylands Industrial Estate at the eastern edge of Hemel Hempstead. In this light, there is a need to provide for new homes suited to well-skilled workers wishing to work in the local area. Also, there is a need to recognise that St Albans is very well-connected to other key employment areas sub-regionally.
- **Historic environment** – it is fair to highlight an argument for a lower growth scenario.
- **Housing** – housing needs locally are quite acute, as discussed within various sections of this report. Reasons for providing for LHN / not exporting unmet need include: 1) housing need should be provided for close to source; 2) there is little certainty regarding when, where or even if unmet need would be provided for; and 3) development viability is high locally, such that there can be good confidence regarding affordable housing delivery. With regards to Scenario 4, there three theoretical benefits: 1) this could assist with meeting affordable housing needs; 2) there would be the potential to provide for unmet need from elsewhere, which could well be an issue, albeit no neighbouring local authorities have formally requested that the St Albans local plan provides for unmet need; and 3) it could be possible to provide for Gypsy and Traveller accommodation needs more fully via strategic urban extensions. However, it is important to consider the capacity of the house building industry to deliver new homes locally (average delivery is under 500 homes).
- **Landscape** – is a constraint locally, mindful of sensitive settlement gaps and also the ongoing Chilterns NL boundary review. However, neighbouring areas are subject to similar or even greater constraint. Under Scenario 4 there would be a need for extensive growth at locations not recommended for further consideration by the Green Belt Review, albeit it is recognised that Green Belt is not strictly a landscape designation.
- **Soils** – St Albans cannot be said to be particularly constrained in the sub-regional context. For example, the nationally available 'provisional' dataset shows SW Herts to be mostly grade 3 quality land, whilst within NEC Herts there is significant grade 2 quality land, and West Essex is associated with very widespread grade 2 quality land. There is also a need to consider quite extensive minerals safeguarding areas locally.
- **Transport** – there is a clear need to provide for housing needs as close to source as possible, from a transport perspective. Furthermore, early commitment to providing for LHN in full, as opposed to generating unmet need to be provided for elsewhere within a constrained sub-region, is conducive to early and effective strategic transport planning, e.g. planning for sub-regionally significant infrastructure. There are strategic opportunities to direct developer funds towards the achievement of transport infrastructure opportunities, notably the A414.
- **Water** – there is theoretical support for setting the housing requirement at LHN, with a view to early and effective planning for water infrastructure and the wider water environment. However, it could potentially be the case that there are particular constraints affecting St Albans, in terms of water quality and/or water resources, e.g. noting potential issues affecting Maple Lodge STW, which serves a very wide area. There is a need for further engagement with the Environment Agency, Thames Water and Affinity Water.

# Appendix IV: Sites GIS analysis

## Introduction

As discussed in Section 5.3, as a relatively minor step in the process of arriving at reasonable growth scenarios (see Figure 5.1) all site options were subjected to GIS analysis in 2023. The outcome of the analysis is in the form of a large spreadsheet of data, with a row for each site option and around 50 columns, where each column presents performance data (e.g. percentage intersect with a flood zone), supplementary data (e.g. the name of the nearest school) or other attribute information (e.g. the proposed use, or uses, for the site in question).

The aim of this section is to present summary insights, considering the data both:

- within each column of the spreadsheet – i.e. information on the spread of data for each performance measure, including site options that stand-out as performing notably well and notably poorly; and
- across each row of the spreadsheet – i.e. considering how each site option performs, in respect of various locational metrics, both in absolute terms and relative to other site options.

### When was this work undertaken?

GIS analysis of site options was run in 2023 ahead of the Draft Plan Local Plan consultation. The decision was taken not to re-run the analysis in 2024, with a view to ensuring proportionate analysis, and recognising the very limited role that GIS analysis plays in the overall process reported in Section 5 of this report.

The drawback to this approach is that the analysis does not account for amendments made to site options. However, this is not considered to be a significant drawback, and efforts are made below to mitigate concerns.

There are two other theoretical drawbacks that are not thought to apply in practice. Firstly, there are not known to be any new or updated key datasets (e.g. showing the location of constraints, or community infrastructure) that need to feed into the analysis. Secondly, the wider methodological approach taken in 2023, including the approach taken to communicating / differentiating the performance of site options against criteria, is considered to be robust.

### Inherent limitations of GIS analysis

GIS analysis of the spatial relationship between site options and various constraint/push (e.g. historic environment designations) and opportunity/pull (e.g. schools) features cannot be considered sophisticated analysis, in that:

- it will rarely serve to highlight an issue or an opportunity associated with any given site option that would not otherwise be readily apparent; and
- many of the issues and opportunities that the analysis does highlight are only 'theoretical', in that they can be discounted, or assigned limited weight in decision-making, upon closer inspection, including after taking into account what the development would involve in practice. For example, where a site is distant from accessible greenspace this can sometimes be addressed by delivery of new accessible greenspace onsite.

As such, GIS analysis of site options should not be overly relied upon, at the expense of a focus on qualitative analysis informed by wide ranging evidence, including the views of stakeholders, and professional judgement.

The analysis should certainly not be used as a primary means for arriving at overall conclusions on site options. Any attempt to utilise the analysis in this way would necessitate a process of Multi Criteria Analysis (MCA) whereby a degree of importance is assigned to each of the performance metrics, and this process is fraught with challenges.

### Structure of this appendix

Set out below is:

- further discussion of methodology;
- insights into the data for a series of key metrics in turn; and then
- insights into the data for each of the site options in turn.

## Methodology

The **first step** was to gather GIS data.

- Site options – the Council provided ‘red line boundaries’ for all HELAA sites. One of the issues / limitations is that large landholdings sometimes get submitted, within which might be contained realistic site options. Also, an issue is that overlapping sites get submitted over time, and it is not necessarily the case that the intention of the landowner is that the most recent submission should supersede the previous submissions.<sup>33</sup>
- Constraint / push and opportunity / pull features - much data is available nationally (‘open source’) and a range of other data is held by the Council. However, there are a range of potential issues to be mindful of, including data becoming out of date, only being available for certain parts of the District or not being available for neighbouring local authority areas. Gathering data on primary and secondary schools has proved particularly challenging, as discussed further below. Suggestions are welcomed on data sources / best use of data.

The **second step** was then to run the analysis, i.e. query the spatial relationship between each site option and each push / pull feature (e.g. distance to a listed building, intersect with a flood zone). There are two points to note:

- Distance was measured “as the crow flies” (it can also be possible to calculate distance by road, footpath etc).
- Distance was calculated from the nearest point of each site option.

Having generated the spreadsheet of data, the **final step** was then to interrogate, utilise and report the data.

## Analysis outcomes by metric

The aim here is to present insights into trends across the data for a range of key metrics and summarise the approach taken to categorising / differentiating the performance of site options on a **red** → **light red** → **amber** → **light green** → **green** scale (N.B. this can be referred to as a ‘RAG’ scale).

### Air quality management area (AQMA)

The analysis finds that no sites intersect an AQMA, and the nearest site is 269m distant. This is a small brownfield site. The second closest site is 500m distant, and the greenfield site option located closest to an AQMA is 998m distant (Land at Verulam Golf Club, St Albans).

The average distance of all sites from an AQMA is 4,621m, whilst the average distance of sites ‘recommended for further consideration by the Green Belt Review’ is 5,311m.

It is very difficult to determine distance thresholds, when seeking to differentiate between the performance of sites on a RAG scale, e.g. given that sensitivity relates to traffic flows more so than distance / proximity. As such, it is important to categorise performance on the basis of the spread of data (with a view to differentiating on the basis of relative performance) as-much-if-not-more-so than on the basis of absolute thresholds.

On balance, it is considered appropriate to:

- assign **red** to the 10 sites within 1,000m
- assign **green** to 139 sites beyond 5,000m
- place the remaining 237 sites on a **colour scale** (from light red to light green) according to distance

Finally, it is important to note that a number of urban proposed allocations have not been run through the GIS analysis but are in proximity to the St Albans AQMA, with one site adjacent. See discussion in Section 9.

### Special Area of Conservation (SAC)

The closest site option is 7,279m, at which distance the primary concern is recreational pressure. In this respect, there is a need to be mindful of the designated 12.6km recreational impact zone surrounding the Ashridge Woods and Commons SSSI component of the Chilterns Beechwoods SAC. Within this zone there is a need for Suitable Alternative Natural Greenspace (SANG) to be in place to absorb the recreational pressure from new homes.

In this light, **light red** is assigned to all sites within the 12.6km zone, and **green** to all other sites. The great majority of affected sites are located to the east of Hemel Hempstead or at Redbourn, but two ‘recommended Green Belt’ sites to the west of Harpenden also just about intersect the recreational impact zone.

Some sites are closer to Wormley-Hoddesdon Park Woods SAC than the Chilterns Beechwoods SAC, but the nearest site is 9,560m and there is not a recreational impact zone defined for this SAC.

<sup>33</sup> No distinction is made within this appendix to distinguish site options that are likely to be superseded. However, it is recognised that inclusion of superseded sites does skew the analysis. Within Section 5 efforts are made to remove likely superseded sites.

## Site of Special Scientific Interest (SSSI)

Four site options are adjacent to a SSSI. In two cases this is Bricket Wood Common SSSI, which is highly sensitive, and in two cases this is Moor Mill Quarry SSSI, which is a geological SSSI and hence presumably less sensitive.

Of the 73 site options closest to a SSSI, in each case the closest SSSI is either Bricket Wood Common SSSI or Moor Mill Quarry SSSI. Focusing on Bricket Wood Common, 14 site options are within 1,000m, which serves to highlight the need to avoid cumulative effects. Part of the SSSI is in 'unfavourable no change' condition.

It is very difficult to identify distance thresholds. 400m is a well-established threshold for recreational pressure (e.g. dog walkers), which is an important consideration for many SSSIs (but not all), but there are a range of other 'impact pathways' (e.g. hydrological), plus recreational pressure can come from much further afield. Natural England has defined 'impact risk zones' for all SSSIs, but these are very extensive, such that they capture many site options and, in turn, can fail to enable effective differentiation between site options.

On balance, it is considered appropriate to:

- assign **red** to the 33 sites within 1,000m
- assign **green** to 161 sites beyond 5,000m
- place the remaining 192 sites on a **colour scale**

Finally, it is noted that whilst the average distance of the site options that featured within the reasonable alternative growth scenarios at the Regulation 18 stage was 5,098m, the average distance of the 15 further site options that were 'noted' (Section 5.4 of the ISA Report, 2023) was 3,076m, given several sites relatively close to Bricket Wood Common). N.B. it has not been possible to update this analysis in respect of the current reasonable alternatives.

## Local Wildlife Site (LWS)

This is a local level designation, in contrast to the international and national designations discussed above.

There is an argument for only assigning 'red' to those sites that intersecting (around 60 sites) or adjacent (around 65 sites); however, on balance, it is considered appropriate to:

- assign **red** to the 143 sites within 20m;
- assign **green** to 31 sites beyond 500m; and
- place the remaining 212 sites on a **colour scale**.

The most constrained 'recommended GB' site is Ashdale Lye Lane, Bricket Wood, which intersects a LWS by 76%. Also, another smaller 'recommended GB' site at Bricket Wood intersects by 12%. Seven other 'recommended GB' sites are considered significantly constrained by a LWS.

Overall, the proposed allocations at the Regulation 18 stage were 147m distant from a LWS on average, whilst the average distance of other site options was 177m. Again, it has not been possible to update this analysis.

## Ancient woodland

In all cases where a site option is in proximity to an ancient woodland it is the case that the ancient woodland is also designated as a LWS. As such, distance to an ancient woodland is not shown in the table below.

## Priority habitat

On balance, it is considered appropriate to:

- assign **red** to the 29 sites that intersect by more than 50%;
- assign **green** to 208 sites that do not intersect; and
- place the remaining 149 sites on a **colour scale**.

The average intersect of all sites is 9.4% whilst the average intersect of 'recommended GB' sites is 12.5%.

## Tree Protection Orders

There are two datasets: 1) individual TPOs; and 2) area TPOs. It was decided appropriate to focus on area TPOs.

On balance, it is considered appropriate to:

- assign **red** to the 15 sites that intersect by more than 50%;
- assign **green** to 308 sites that do not intersect; and
- place the remaining 63 sites on a **colour scale**.

Two 'recommended GB' sites have more than 50% coverage and another has 44% coverage. Also two further such sites are associated with eight or more individual TPOs.

## Historic environment designations

The distance thresholds used can be seen in the table below. Other points to note are:

- No proposed allocations are in proximity to either a Grade I or Grade II\* Registered Park and Garden (two sites at Harpenden are ~2km, including North West Harpenden).
- One proposed strategic site (West Redbourn) is in proximity to a Grade I parish church (122m).
- Hemel Garden Communities (HGC) includes one Grade 2\* listed building (also several Grade II) and there is also a Grade II\* listed building closely associated with Burston Garden Centre, How Wood.
- There are 12 Grade II listed buildings within HGC. Only one other emerging preferred site includes a Grade II listed building (Burston Garden Centre, How Wood).
- It is important to recall that the thresholds are set on the basis of the spread of data as much, if not more so, than on the basis of known / potential impact distance thresholds. This is with a view to effective differentiation.
- It is recognised that there are limitations to GIS analysis. The aim is for the analysis simply to serve as an input to the process of defining reasonable alternatives for appraisal and consultation.

## Schools

The County Council maintains a GIS layer / dataset showing the location of all schools. It is helpfully the case that this dataset covers not only St Albans District but also all surrounding districts bar Central Beds to the north, where there are not thought to be any schools that would serve St Albans District to any significant extent.

However, there is a need to carefully prepare the dataset for use, including:

- Differentiate between primary and secondary schools (also accounting for 'all through' schools) and primary schools with and without a nursery (and, in turn, stand-alone nurseries).
- Sift out special educational needs (SEN) schools and fee paying schools.
- Be mindful of selective schools, single sex schools and schools serving particular communities.

The analysis shows some notable trends. With regards to secondary schools, sites at Redbourn, Wheathampstead and Radlett are notably distant, as well as sites in the Harperbury Park area (between Radlett and London Colney). With regards to primary schools, land 'recommended by the GB Review' at Gustard Wood (Wheathampstead sub-area) is notably distant, as is 'recommended' land north of Radlett. It is also notable that there is no primary school in Hatching Green / South West Harpenden area. Finally, it should be noted that there is no primary school at Harperbury Park, but the analysis has taken account of a nearby school serving the Jewish community.

## All metrics

Having introduced the broad approach, the table below summarises the RAG-shading approach taken to all 25 performance metrics assigned a column within the table below (N.B. performance was also measured for a range of other metrics, but the outcome of the analysis is of less importance to the task of differentiating site options).

**Table A:** Thresholds used for classifying performance on a RAG scale

Metric	Red	Light red → light green	Dark green
Air Quality Management Area (AQMA)	<1,000m	Other sites	>5,000m
Special Area of Conservation (SAC)	-	<12,500m from Chilterns Beechwoods = light red	Other sites
Site of Special Scientific Interest (SSSI)	<1,000m	Other sites	>5,000m
Local Wildlife Site (LWS)	<20m	Other sites	>500m



Metric	Red	Light red → light green	Dark green
Priority habitat	>50% intersect	Other sites	No intersect
Tree Protection Order (TPO)	>50% intersect	Other sites	No intersect
Scheduled monument	<30m	Other sites	>1,000m
Conservation area <sup>34</sup>	-	Intersect = light red; no intersect = light green	-
G1 or G2* Registered park/garden (RPG)	<1,000m	Other sites	>3,000m
G2 RPG	<1,000m	Other sites	>3,000m
G1 Listed Building (LB)	<400m	Other sites	>2,000m
Grade 2* LB	<200m	Other sites	>1,000m
G2 LB	<20m	Other sites	>100m
Archaeological record area	-	Intersect = light red; no intersect = light green	-
Chilterns AONB	<1,000m	Other sites	>10,000m
Flood zone 2	>30% intersect	Other sites	<1% intersect
1 in 100 yr surface water flood risk	>30% intersect	Other sites	<1% intersect
Agricultural land <sup>35</sup>	Grade 2	Grade 3 = light red; other = light red	-
Former landfill	-	>5% intersect = light red; other = light green	-
City or town centre	-	Other sites	<2,000
Neighbourhood centre	-	Other sites	<8,000
Secondary school	>2,500m	Other sites	<1,000m
Primary school	>1,200m	Other sites	<400m
Index of Multiple Deprivation (IMD)	-	Light red (more affluent) to light green (less affluent)	-

## Analysis outcomes by site option

The site options analysis is presented below by sub-area (see Section 5.4). For each sub-area, the table includes a row for each site option and a column for each of the performance metrics introduced above.<sup>36</sup>

Within each table, the sites are listed in order of 'status' aligning with the work in Section 5 of this report.<sup>37</sup>

It is important to reiterate the tables **do not aim is not to predict significant effects**, but rather simply to differentiate the relative performance of site options in respect of specific performance metrics. Whilst this can serve to inform consideration of overall performance, for any given site option, the aim of the analysis is not to draw conclusions in this regard (recognising that the metrics are not assigned any weight, nor do they have equal weight).

<sup>34</sup> In a number of cases sites intersect only by a slither (likely a digitising error), such that in practice they are adjacent.

<sup>35</sup> Account is taken of the highest grade land that the site intersects; no account is taken of known urban or PDL sites.

<sup>36</sup> N.B. the ten sites with a HELAA ref ending in '23' were created in 2023, i.e. subsequent to the HELAA.

<sup>37</sup> There are two points to note. Firstly, the list of permitted is not comprehensive; only three sites at Chiswell Green have been added since the ISA Report (2023). Secondly, the list of 'noted' sites shown here is mostly unchanged from 2023. These 'noted' sites from 2023 were shown in Figure 5.7 of the ISA Report, which is reproduced as Figure 5.7 in this report. The list is updated only to additionally 'note' a number of sites that previously featured as proposed allocations, or within the RA growth scenarios in 2023. See Section 5.4 for discussion of numerous other 'noted' omission sites.

Edge of Hemel Hempstead (inc. HGC)

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
R-30-21	Permitted	5.6	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-01-18	PDL in the GB	1.7	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-04-18 <sup>38</sup>	GB Review recommended allocation (constant)	97.2	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SMR-01-23 <sup>39</sup>	Other proposed allocation (constant)	430	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SMR-01-21	-	417	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-02-16	-	162	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-02-18	-	146	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-03-16	-	137	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-03-18	-	98.9	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-05-18	-	87.2	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-04-21	-	43.2	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-04-16	-	35.1	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-22-21	-	34.7	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-28-17	-	20.3	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-08-21	-	9.2	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-17-18	-	7.0	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-23-18	-	3.8	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-08-18	-	2.2	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-23-21	-	1.7	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-05-18	-	1.1	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SM-02-21	-	0.5	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

<sup>38</sup> Approximately the extent of land recommended for further consideration by the Green Belt Review (all bar the very southern extent of the site).

<sup>39</sup> The full extent of the HGC area in St Albans District.

St Albans

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
SA-22-21	Permitted	5.1	Orange	Green	Green	Yellow	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Orange
CH-30-21	PDL in the GB	3.3	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Green	Green	Orange
SA-20-21	PDL in the GB	1.9	Orange	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Orange	Orange
CH-36-21	GB Review recommended allocation (constant)	20.8	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Orange	Green	Red	Green	Orange	Orange	Green	Red	Orange
SA-18-21	GB Review recommended allocation (constant)	5.8	Red	Green	Yellow	Orange	Green	Orange	Red	Green	Green	Red	Red	Yellow	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Orange
CH-01-21	GB Review recommended allocation (constant)	3.3	Orange	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange
SA-07-21	GB Review recommended allocation (constant)	3.2	Red	Green	Yellow	Orange	Green	Green	Orange	Red	Green	Orange	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange
CH-12-21	GB Review recommended allocation (constant)	1.4	Yellow	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Red	Orange
SA-10-16 <sup>40</sup>	Other proposed allocation (constant)	39.4	Orange	Green	Green	Red	Orange	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Yellow
SAN-06-23 <sup>41</sup>	Other proposed allocation (variable)	21.8	Orange	Green	Green	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange
CH-27-23	Omission site but features in the RAs	57.6	Orange	Green	Yellow	Yellow	Green	Yellow	Green	Green	Green	Red	Orange	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange
SAN-16-21	Omission site but features in the RAs	30.2	Orange	Green	Green	Orange	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Orange
SAN-14-21	Omission site but features in the RAs	24.9	Orange	Green	Green	Yellow	Orange	Green	Orange	Red	Green	Green	Green	Orange	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Yellow
SAN-12a-21	Omission site but features in the RAs	24.2	Orange	Green	Green	Orange	Yellow	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Yellow
SA-25-21	Omission site but features in the RAs	14.1	Orange	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange
SAN-24-21	Omission site but features in the RAs	10.7	Orange	Green	Green	Red	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Yellow
SANCH-01-23	Omission site but noted (see Figure 5.7)	108	Orange	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Yellow
SA-21-21	Omission site but noted (see Figure 5.7)	11.7	Orange	Green	Orange	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Green
SANCH-01-18	-	144	Orange	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Yellow
SMSA-01-17	-	133	Orange	Red	Yellow	Red	Orange	Green	Red	Green	Green	Red	Yellow	Green	Red	Red	Orange	Green	Green	Red	Green	Green	Green	Green	Green	Green
SMSA-01-18	-	117	Orange	Red	Yellow	Red	Green	Green	Red	Green	Green	Red	Yellow	Green	Red	Red	Orange	Green	Green	Red	Green	Green	Green	Green	Green	Green

<sup>40</sup> There are three similar versions of SA-10, dated 2016, 2018 and 2021. The decision was taken to analyse SA-10-16, which *does not* include land with planning permission for 150 homes (ref. 5/2021/0423), which is HELAA site SA-22-21 (approximately). However, the decision has been taken to allocate part of SA-10-21, which *does* include the area of land with planning permission.

<sup>41</sup> An amended version of SAN-06-21 (to remove the long access road).

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
CH-27-21	-	97.3	Orange	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Red	Orange	Green	Red	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange
SMSA-02-21	-	85.7	Orange	Red	Yellow	Red	Red	Green	Red	Green	Green	Red	Orange	Green	Red	Red	Orange	Green	Green	Red	Green	Green	Green	Green	Yellow	Green
SAN-01-18	-	69.0	Yellow	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Orange	Yellow
STS-01-17	-	65.0	Yellow	Green	Red	Red	Green	Red	Orange	Green	Green	Orange	Green	Green	Red	Red	Green	Green	Green	Red	Green	Orange	Orange	Orange	Red	Orange
CH-35-21	-	53.2	Yellow	Green	Yellow	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Green	Green	Orange
SA-10-21	-	49.2	Orange	Green	Green	Red	Orange	Yellow	Orange	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow
SA-10-18	-	44.7	Orange	Green	Green	Red	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow
STS-01-18	-	37.7	Yellow	Green	Red	Red	Green	Red	Orange	Green	Green	Orange	Green	Green	Red	Red	Green	Green	Green	Red	Green	Orange	Orange	Orange	Red	Orange
RF-01k-21	-	33.7	Orange	Green	Orange	Red	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Green	Green	Orange	Green	Red	Green	Green	Green	Green	Green	Green
SMSA-03-21	-	29.6	Orange	Green	Yellow	Red	Green	Green	Orange	Green	Green	Red	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Green
SAN-12b-21	-	24.2	Orange	Green	Green	Orange	Green	Green	Red	Green	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow
SAN-06-21	-	23.7	Orange	Green	Green	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Orange	Orange
CH-10-21	-	23.0	Yellow	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Green	Orange	Orange	
SAN-08-18	-	20.8	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Red	Yellow
CH-25-21	-	19.5	Yellow	Green	Yellow	Red	Green	Green	Green	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Green	Yellow	Orange
RF-01j-21	-	15.3	Red	Green	Yellow	Red	Green	Green	Orange	Red	Green	Green	Yellow	Green	Red	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Yellow	Green
SAN-23-21	-	14.1	Yellow	Green	Green	Yellow	Green	Green	Green	Red	Green	Green	Green	Red	Red	Red	Green	Green	Orange	Red	Green	Yellow	Yellow	Green	Yellow	Yellow
SA-26-21	-	13.9	Orange	Green	Yellow	Red	Green	Orange	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Orange	Orange	Orange
SAN-05c-21	-	12.8	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Yellow	Green	Green	Orange	Yellow
CH-13-16	-	11.2	Yellow	Green	Green	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Green	Orange	Orange
SAN-09-18	-	10.0	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
SAN-04-21	-	9.9	Yellow	Green	Green	Red	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Red	Green	Yellow	Yellow	Green	Green	Yellow
SAN-05a-21	-	9.0	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Orange	Green	Green	Red	Yellow
SA-16-21	-	9.0	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Orange	Orange	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Yellow	Green	Green
SAN-03-21	-	8.9	Yellow	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Orange	Yellow
SAN-05b-21	-	8.7	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Yellow	Green	Green	Red	Yellow

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
SAN-04-18	-	8.7	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Red	Red	Green	Yellow	Yellow	Green	Green	Yellow
CH-38-17	-	7.6	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Green	Red	Yellow
SAN-17-18	-	7.3	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
SA-09-18	-	7.1	Red	Green	Yellow	Red	Red	Green	Red	Green	Green	Red	Orange	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Green	Green	Red
SAN-15-21	-	7.0	Yellow	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Orange	Yellow	Red	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Red	Yellow
CH-08-16	-	7.0	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Red	Orange
SA-16-18	-	5.7	Red	Green	Green	Yellow	Yellow	Green	Yellow	Green	Green	Red	Orange	Orange	Green	Red	Yellow	Green	Green	Red	Green	Green	Green	Orange	Green	
SAN-09-21	-	5.5	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
CH-34-16	-	4.3	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Red	Orange
CH-29-21	-	4.1	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Red	Orange
SAN-20-21	-	4.0	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
SAN-20-18	-	3.8	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
RF-01i-21	-	3.2	Red	Green	Yellow	Red	Green	Green	Green	Red	Green	Red	Green	Green	Orange	Green	Green	Green	Green	Red	Green	Green	Green	Orange	Green	Green
CH-05-16	-	3.0	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Red	Orange
CH-11-21	-	2.7	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Yellow	Yellow	Green	Red	Orange
SA-03-21	-	2.4	Red	Green	Green	Red	Red	Green	Orange	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red
CH-33-18	-	2.2	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Red	Orange
SA-05-18	-	2.2	Red	Green	Yellow	Orange	Red	Green	Orange	Red	Green	Orange	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red
SA-05-16	-	2.1	Red	Green	Yellow	Orange	Red	Green	Orange	Red	Green	Orange	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red
SAN-02-16	-	2.0	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
SAN-02-21	-	1.9	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
SAN-10-21	-	1.9	Yellow	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
SAN-21-18	-	1.4	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Green	Green	Red	Red	Red	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
SA-28-16	-	1.4	Red	Green	Green	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow
CH-16-18	-	1.2	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Green	Orange	Orange
SAN-07-18	-	1.2	Yellow	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Yellow	Red

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
CH-20-21	-	1.1	Yellow	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Yellow	Yellow	Green	Red	Orange
CH-39-21	-	1.0	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Red	Orange
CH-15-18	-	0.9	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Orange	Red	Green	Yellow	Yellow	Green	Red	Orange
SAN-19-17	-	0.8	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Yellow
SA-30-21	-	0.7	Red	Green	Green	Orange	Orange	Green	Orange	Red	Green	Orange	Yellow	Green	Orange	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Orange
SA-19-21	-	0.7	Red	Green	Green	Green	Orange	Green	Orange	Red	Green	Green	Red	Orange	Green	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green
SA-27-18	-	0.7	Orange	Green	Green	Orange	Orange	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SA-14-21	-	0.6	Red	Green	Green	Red	Red	Green	Orange	Red	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Yellow
SA-17-21	-	0.6	Red	Green	Green	Orange	Yellow	Green	Yellow	Red	Green	Orange	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Orange
SA-08-16	-	0.6	Red	Green	Green	Red	Green	Orange	Red	Red	Green	Orange	Red	Red	Red	Red	Yellow	Red	Green	Green	Green	Green	Green	Green	Green	Orange
SA-29-17	-	0.5	Red	Green	Green	Green	Green	Green	Yellow	Red	Green	Yellow	Red	Red	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Orange
SA-02-21	-	0.4	Orange	Green	Green	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange
SAN-22-18	-	0.4	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Orange	Green	Red	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Orange	Yellow
CH-18-21	-	0.4	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Red	Orange
SA-13-21	-	0.4	Red	Green	Green	Green	Green	Green	Orange	Red	Green	Yellow	Red	Red	Red	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green
SA-24-21	-	0.3	Red	Green	Green	Green	Green	Green	Orange	Red	Green	Yellow	Red	Orange	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange
SAN-13-21	-	0.3	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Red	Yellow
SAN-18-18	-	0.2	Orange	Green	Green	Orange	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red
CH-09-18	-	0.2	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Red	Orange
SA-06-21	-	0.2	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange
SA-23-21	-	0.2	Red	Green	Green	Orange	Green	Orange	Red	Red	Green	Orange	Red	Red	Red	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Orange
SM-10-18	-	0.1	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Orange	Green	Green	Green
CH-19-21	-	0.1	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Red	Orange
SA-11-21	-	0.1	Red	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange
SA-15-18	-	0.0	Red	Green	Green	Orange	Green	Green	Green	Red	Green	Orange	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow

Harpenden

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
HT-08-18 <sup>42</sup>	GB Review recommended allocation (constant)	11.6																								
WH-02-21 <sup>43</sup>	GB Review recommended allocation (constant)	7.2																								
WH-32-21	GB Review recommended allocation (constant)	2.3																								
HT-22-18	GB Review recommended allocation (constant)	1.9																								
HT-13-21	GB Review recommended allocation (constant)	1.9																								
HT-10-23 <sup>44</sup>	GB Review recommended allocation (constant)	1.6																								
HT-04-21	GB Review recommended allocation (constant)	1.2																								
HT-11-21	GB Review recommended allocation (constant)	0.9																								
HR-02-18	GB Review recommended allocation (constant)	0.8																								
HT-20-21	GB Review recommended allocation (constant)	0.7																								
HT-01-21 <sup>45</sup>	GB Review recommended allocation (constant)	0.6																								
HT-12-21	GB Review recommended allocation (constant)	0.6																								
HTWH-1-23 <sup>46</sup>	Other proposed allocation (constant)	31.4																								
HT-21-21	Omission site but noted (previously an allocation)	6.5																								
HT-05-21	Omission site but noted (previously an allocation)	4.1																								
HT-03-23	Omission site but noted (previously an allocation)	2.0																								
WH-30-21	Omission site but noted (see Figure 5.7)	65.8																								
HT-07-21	Omission site but noted (see Figure 5.7)	27.4																								
WH-35-18	Omission site but noted (see Figure 5.7)	10.2																								
HTWH-1-18	-	42.8																								

<sup>42</sup> The decision was taken to analyse HT-08-18, which is very similar in extent to the land recommended by the GB Review and proposed for allocation.

<sup>43</sup> This is part of the Northeast Harpenden preferred strategic allocation. It is mostly (all bar the northern extent) recommended for further consideration by the Green Belt Review.

<sup>44</sup> The Rothamsted Research, Harpenden Campus proposed employment allocation.

<sup>45</sup> Part of the Northeast Harpenden proposed strategic allocation.

<sup>46</sup> The full extent of the proposed Northeast Harpenden proposed strategic allocation.

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation	
HT-07-18	-	17.1																									
HT-10-21	-	13.6																									
WH-04-18	-	13.1																									
HT-10-18	-	12.3																									
WH-04-21	-	8.8																									
WH-02-16	-	6.8																									
HR-05-16	-	6.6																									
HT-18-16	-	6.4																									
HT-03-21	-	6.1																									
WH-12-17	-	5.7																									
WH-12-21	-	5.1																									
WH-17-21	-	4.3																									
HT-19-18	-	4.0																									
WH-32-16	-	3.5																									
WH-40-21	-	3.2																									
HT-27-21	-	3.2																									
HT-22-17	-	2.6																									
HT-30-18	-	2.4																									
WH-01-18	-	2.2																									
HR-08-18	-	2.0																									
HR-11-21	-	1.8																									
WH-26-21	-	1.8																									
WH-07-21	-	1.6																									
WH-33-21	-	1.5																									
HR-06-21	-	1.3																									
HT-29-16	-	1.1																									



HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
WH-16-16	-	1.1	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Red	Red	Orange
WH-16-21	-	1.0	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Yellow	Green	Red	Orange
HT-24-21	-	0.9	Green	Green	Green	Yellow	Green	Green	Green	Green	Orange	Green	Green	Red	Green	Green	Orange	Green	Green	Red	Green	Green	Orange	Green	Orange	Red
HT-28-21	-	0.9	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Green
HT-06-16	-	0.9	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Green
WH-16-18	-	0.7	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Yellow	Green	Red	Orange
WH-08-21	-	0.6	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Orange	Green	Green	Orange
WH-14-18	-	0.6	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Orange
HR-12-18	-	0.6	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Orange	Green	Red	Green	Green	Red	Green	Green	Orange	Red	Red	Orange
WH-13-18	-	0.5	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Yellow	Orange	Green	Green	Green	Green	Green	Green	Red	Orange
WH-06-17	-	0.5	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Orange	Red	Green	Green	Green	Green	Red	Orange
HT-06a-21	-	0.5	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Green	Green
WH-13-21	-	0.4	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Orange
HT-06b-21	-	0.4	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Yellow	Green	Green	Green
HT-25-16	-	0.4	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Green	Red	Green	Green	Green	Yellow	Green	Green	Red
HT-15-21	-	0.3	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Yellow	Green	Green	Red
WH-11-18	-	0.3	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Yellow	Green	Green	Orange
HT-14-21	-	0.3	Green	Green	Green	Red	Green	Orange	Green	Green	Green	Green	Orange	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Green	Yellow	Green	Red
HR-10-21	-	0.2	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Orange	Green	Green	Orange	Green	Green	Red	Green	Green	Orange	Red	Red	Orange
HT-23-18	-	0.2	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Orange	Green	Green	Red	Green	Green	Green	Red	Red	Green
HT-33-17	-	0.2	Green	Green	Green	Orange	Red	Green	Green	Red	Green	Green	Yellow	Red	Green	Green	Orange	Green	Green	Red	Green	Green	Green	Green	Green	Orange
HT-16-16	-	0.2	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Red	Green	Green	Orange	Green	Green	Red	Green	Green	Green	Green	Green	Orange
HT-32-17	-	0.2	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Orange	Green	Red	Green	Yellow	Orange	Green	Red	Green	Green	Green	Green	Yellow	Orange
HT-17-21	-	0.2	Green	Green	Green	Yellow	Orange	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Red	Red	Green	Green	Orange	Green	Green	Red
HT-26-21	-	0.1	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Orange	Green	Orange
WH-31-18	-	0.1	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Yellow	Green	Orange	Orange

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
HT-09-21	-	0.0																								

London Colney

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
LC-12-21	Urban allocation	0.7																								
LC-02-23 <sup>47</sup>	Other proposed allocation (constant)	38.2																								
LC-14-17	Omission site but noted (previously in RAs)	12.8																								
LC-16-17	Omission site but noted (previously in RAs)	8.4																								
LC-15-17	Omission site but noted (previously in RAs)	6.8																								
LC-10-17	Omission site but noted (see Figure 5.7)	8.1																								
LC-02-21	-	86.4																								
LC-01-21	-	33.0																								
STS-36-18	-	28.4																								
LC-08-21	-	27.4																								
RF-01b-21	-	27.4																								
RF-01d-21	-	27.1																								
RF-01m-21	-	26.1																								
LC-04-16	-	20.7																								
LC-06-21	-	8.6																								

<sup>47</sup> Amended version of LC-02-21 comprising the preferred housing and school site.

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
			LC-11-18	-	4.6	Green	Green	Yellow	Red	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
RF-01c-21	-	4.2	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Green	Red	Green	Green
LC-17-18	-	1.3	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
LC-13-17	-	0.8	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
LC-03-21	-	0.3	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
LC-07-18	-	0.3	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
LC-05-18	-	0.1	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green

Redbourn

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
			R-03/06-23 <sup>48</sup>	GB Review recommended allocation (constant)	27.4	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green
R-18-21	GB Review recommended allocation (variable)	12.6	Green	Red	Green	Yellow	Green	Yellow	Green	Red	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-09-21	Omission site but noted (see Figure 5.7)	41.4	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-09-18	-	44.1	Green	Red	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-12-16	-	33.0	Green	Red	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-12-18	-	21.4	Green	Red	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-12-21	-	18.5	Green	Red	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-03-18	-	15.9	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
R-03-21	-	14.9	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green

<sup>48</sup> The full extent of the West Redbourn preferred strategic allocation.

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
R-06-21	-	14.0	Green	Red	Green	Orange	Green	Green	Red	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
R-18-18	-	13.5	Green	Red	Green	Orange	Green	Yellow	Green	Red	Green	Green	Orange	Red	Yellow	Green	Red	Red	Orange	Red	Green	Green	Green	Red	Orange	Green
R-06a-16	-	11.7	Green	Red	Green	Orange	Green	Green	Red	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
R-19-16	-	9.9	Green	Red	Green	Orange	Green	Yellow	Green	Red	Green	Green	Orange	Red	Yellow	Green	Red	Red	Red	Red	Green	Green	Green	Red	Orange	Green
R-13-21	-	4.7	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
R-01-21	-	2.8	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Yellow	Orange	Green	Green	Red	Green	Green	Red	Green	Green	Green	Orange	Yellow	Orange
R-10-16	-	2.6	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Orange	Green	Red	Green	Green	Red	Green	Green	Green	Red	Green	Orange
R-06b-16	-	2.3	Green	Red	Green	Orange	Green	Green	Yellow	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
R-07-21	-	2.3	Green	Red	Green	Orange	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Yellow	Orange
R-20-21	-	2.3	Green	Red	Green	Yellow	Green	Orange	Green	Green	Green	Green	Orange	Red	Yellow	Green	Red	Red	Red	Green	Green	Green	Green	Red	Orange	Green
R-26-21	-	1.7	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Green	Orange
R-16-21	-	1.4	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Orange	Orange
R-11-21	-	1.0	Green	Red	Green	Red	Orange	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Orange	Orange
R-21-21	-	0.9	Green	Red	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Red	Yellow	Green	Green	Red	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
R-15-18	-	0.6	Green	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Orange	Orange
R-08-21	-	0.6	Green	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Orange	Orange
R-25-21	-	0.5	Green	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Yellow	Orange
R-27-18	-	0.5	Green	Red	Green	Green	Orange	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
R-24-16	-	0.4	Green	Red	Green	Yellow	Orange	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Green	Orange
R-14-17	-	0.2	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Red	Green	Green	Red	Green	Yellow	Green	Red	Orange	Orange
R-29-17	-	0.1	Green	Red	Green	Yellow	Green	Green	Green	Red	Green	Green	Orange	Red	Red	Red	Red	Green	Yellow	Green	Green	Yellow	Green	Red	Green	Red

Wheathampstead

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
WH-24-17	GB Review recommended allocation (variable)	5.7	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-28-21	GB Review recommended allocation (variable)	3.6	Green	Green	Green	Red	Orange	Green	Red	Green	Green	Yellow	Red	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-10-18	Omission site but noted (previous allocation)	4.6	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Green	Green	Red	Green	Yellow	Orange	Red	Green	Green
WH-03-21	Omission site but noted (previous allocation)	1.0	Green	Green	Green	Green	Orange	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Red	Yellow	Red
WH-22-17	Omission site but noted (previous allocation)	0.3	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Yellow	Green	Red	Green	Green
WH-05-21	-	57.9	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange	Orange	Green	Green	Red	Green	Green	Green	Green	Red	Orange	Green	Red	Green	Green
WH-18-21	-	14.1	Green	Green	Green	Red	Orange	Green	Red	Green	Green	Yellow	Orange	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-09-16	-	8.5	Green	Green	Green	Red	Red	Yellow	Orange	Green	Green	Yellow	Red	Green	Green	Red	Green	Orange	Yellow	Green	Green	Yellow	Green	Red	Yellow	Green
WH-25-21	-	7.3	Green	Green	Green	Green	Red	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-21-18	-	7.1	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-23-21	-	4.7	Green	Green	Green	Orange	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-19-21	-	3.7	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Orange	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-20-16	-	3.2	Green	Green	Green	Orange	Green	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-36-21	-	2.1	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-34-21	-	1.9	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-27-18	-	1.8	Green	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Orange	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-39-18	-	1.4	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Green	Yellow	Green	Red	Green	Green
WH-03-18	-	1.4	Green	Green	Green	Orange	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Yellow	Red
WH-15-17	-	0.8	Green	Green	Green	Red	Orange	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Red	Green	Red	Green	Yellow	Green	Red	Green	Green
WH-38-18	-	0.4	Green	Green	Green	Red	Green	Green	Green	Red	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Red	Green
WH-37-17	-	0.2	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Red	Red	Red	Green	Yellow	Green	Red	Green	Green

### Bricket Wood

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
STS-18-21	Urban allocation	0.2	Green	Green	Red	Orange	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Yellow	Yellow	Red	
STS-30-21	GB Review recommended allocation (variable)	3.1	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Red	Yellow	Orange	Yellow
STS-57-21	GB Review recommended allocation (variable)	2.5	Green	Green	Red	Red	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Orange	Orange	Orange
STS-54-21	GB Review recommended allocation (variable)	1.3	Yellow	Green	Red	Red	Green	Green	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Green	Green	Red
STS-55-21	Omission site but noted (see Figure 5.7)	10.5	Yellow	Green	Red	Red	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Orange	Red	Green	Green	Yellow
STS-62-21	Omission site but noted (see Figure 5.7)	9.2	Green	Green	Red	Orange	Orange	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Red	Red	Orange	Orange
STS-31-21	Omission site but noted (see Figure 5.7)	5.8	Green	Green	Red	Yellow	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Orange	Yellow
STS-17-16	-	18.9	Green	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Orange	Orange	Green	Yellow	Yellow
STS-31-16	-	9.3	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Orange	Yellow
STS-02-18	-	2.6	Green	Green	Red	Orange	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Red	Red	Red	Orange
STS-02-21	-	2.5	Green	Green	Red	Orange	Green	Red	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Red	Red	Red	Orange
STS-54-18	-	1.5	Yellow	Green	Red	Red	Green	Green	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Green	Green	Red
STS-44-18	-	0.3	Green	Green	Red	Green	Orange	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Red	Green	Green	Red
STS-65-21	-	0.2	Green	Green	Red	Orange	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Red	Red	Orange	Orange
STS-45-21	-	0.2	Green	Green	Red	Red	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Orange	Orange	Orange

Chiswell Green, How Wood and Park Steet & Frogmore

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
STS-53-21 <sup>49</sup>	Permitted	14.4	Orange	Green	Orange	Yellow	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green
STS-10-21	Permitted	13.9	Orange	Green	Orange	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green
SM-09-21	Permitted	2.1	Orange	Green	Orange	Yellow	Red	Green	Green	Green	Green	Yellow	Green	Green	Orange	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green
STS-23-21	Urban allocation	0.5	Orange	Green	Orange	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red
STS-04-23	GB Review recommended allocation (variable)	14.9	Yellow	Green	Red	Red	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Green	Green	Red	Green	Green	Orange	Orange	Green	Green
STS-64-21	GB Review recommended allocation (variable)	4.3	Orange	Green	Orange	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange
STS-38-18 <sup>50</sup>	GB Review recommended allocation (variable)	4.1	Yellow	Green	Orange	Green	Red	Red	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Green	Green	Orange	Orange	Red	Yellow
STS-32-18	GB Review recommended allocation (variable)	2.3	Orange	Green	Orange	Yellow	Green	Green	Green	Green	Green	Orange	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange
STS-08-21	GB Review recommended allocation (variable)	1.1	Yellow	Green	Orange	Red	Yellow	Yellow	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Yellow	Green
STS-14-21	Omission site but noted (see Figure 5.7)	25.2	Orange	Green	Orange	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Green	Green	Green	Orange
STS-66-18	Omission site but noted (see Figure 5.7)	11.5	Orange	Green	Orange	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange
STS-20-21	Omission site but noted (see Figure 5.7)	5.5	Orange	Green	Orange	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Orange
RF-01a-21	-	153	Orange	Green	Orange	Red	Red	Green	Green	Red	Green	Red	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green
RF-02-21	-	119	Orange	Green	Orange	Red	Green	Green	Green	Red	Green	Red	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green
STS-46-18	-	92.4	Yellow	Green	Red	Red	Green	Green	Green	Red	Green	Orange	Green	Green	Orange	Green	Green	Yellow	Green	Red	Red	Green	Orange	Orange	Green	Green
RF-01h-21	-	77.2	Yellow	Green	Red	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Yellow	Green	Red	Red	Green	Orange	Orange	Green	Green
STS-19-16	-	56.5	Yellow	Green	Orange	Red	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Green	Green	Red	Red	Green	Orange	Orange	Red	Yellow
STS-19-21	-	52.8	Yellow	Green	Orange	Red	Orange	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Green	Green	Green	Red	Red	Green	Orange	Orange	Red	Yellow
STS-04-21	-	27.3	Yellow	Green	Red	Red	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Green	Green	Red	Red	Green	Orange	Orange	Green	Green
STS-14-18	-	26.7	Orange	Green	Orange	Orange	Yellow	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Green	Green	Green	Orange
STS-67-21	-	25.8	Yellow	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Red	Green	Orange	Orange	Red	Yellow
RF-01l-21	-	22.6	Orange	Green	Orange	Red	Yellow	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Red	Red	Green	Green	Green	Green	Orange

<sup>49</sup> The permission appears not to align entirely with the HELAA site  
<sup>50</sup> The boundary of this site has been modestly extended to the east since 2023.

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
STS-03-17	-	15.5	Yellow	Green	Red	Red	Green	Green	Green	Green	Green	Yellow	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green	Orange	Orange	Green	Green
RF-01g-21	-	14.9	Yellow	Green	Red	Red	Green	Green	Green	Red	Green	Red	Green	Green	Orange	Green	Green	Red	Orange	Green	Green	Green	Orange	Orange	Green	Green
STS-49-17	-	12.7	Orange	Green	Red	Green	Green	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Yellow	Red	Yellow
STS-56-21	-	12.3	Yellow	Green	Red	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Red	Green	Orange	Red	Green	Green
STS-49-21	-	10.9	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Yellow	Red	Yellow
STS-24-21	-	10.0	Orange	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Yellow	Orange	Red	Yellow
STS-47-21	-	6.6	Green	Green	Red	Red	Green	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Orange
STS-13-16	-	6.1	Orange	Green	Red	Green	Red	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Orange	Orange
STS-06-21	-	5.8	Orange	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Green	Red	Green	Green	Orange	Orange	Green	Green
STS-11-17	-	5.3	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Green	Yellow	Orange	Orange	Yellow
STS-21-18	-	4.3	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Red	Green	Green	Yellow	Green	Orange	Orange
STS-22-18	-	4.2	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Red	Green	Green	Yellow	Green	Orange	Orange
STS-07-18	-	3.9	Orange	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Red	Green	Green	Green	Red	Green	Green	Orange	Orange	Green	Green
STS-12-17	-	2.5	Orange	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Orange	Orange	Yellow
STS-48-21	-	2.3	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Green	Red	Green	Orange	Orange	Red	Red	Orange
STS-37-17	-	2.1	Yellow	Green	Red	Green	Yellow	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Red	Yellow
STS-35-21	-	2.1	Orange	Green	Red	Red	Green	Green	Green	Red	Green	Red	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Orange	Orange	Green	Green
STS-35-16	-	2.0	Orange	Green	Red	Red	Green	Green	Green	Red	Green	Red	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Orange	Orange	Green	Green
STS-26-21	-	1.4	Yellow	Green	Red	Red	Green	Yellow	Green	Red	Green	Red	Green	Green	Red	Green	Green	Red	Orange	Green	Green	Green	Red	Green	Green	Green
STS-29-21	-	1.3	Orange	Green	Red	Green	Green	Orange	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Yellow
STS-58-21	-	1.2	Orange	Green	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Yellow
STS-60-21	-	1.1	Yellow	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Orange	Red	Orange
SA-12-18	-	0.8	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Red
SA-12-21	-	0.8	Red	Green	Orange	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Red
SM-06-21	-	0.7	Orange	Green	Orange	Orange	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Red	Green	Green	Green	Red	Green	Green	Green	Yellow	Yellow	Green
STS-27-21	-	0.7	Orange	Green	Red	Orange	Green	Green	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Orange	Orange	Orange	Yellow



HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
STS-28-21	-	0.5	Orange	Green	Red	Yellow	Green	Red	Green	Green	Green	Yellow	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Orange	Green
SM-06-16	-	0.5	Orange	Green	Yellow	Orange	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Red	Yellow	Green	Green	Red	Green	Green	Green	Yellow	Orange	Green
STS-63-18	-	0.5	Orange	Green	Red	Yellow	Orange	Green	Green	Green	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Orange	Yellow	Green	Orange
STS-68-18	-	0.4	Yellow	Green	Red	Red	Green	Green	Green	Red	Green	Orange	Green	Green	Red	Green	Green	Green	Green	Green	Green	Yellow	Orange	Red	Green	Green
STS-41-16	-	0.2	Orange	Green	Red	Red	Green	Green	Green	Red	Green	Orange	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Green	Green
SM-07-21	-	0.2	Orange	Green	Yellow	Orange	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Red	Yellow	Green	Green	Red	Green	Green	Green	Orange	Green	Green
STS-09-18	-	0.1	Yellow	Green	Red	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Yellow	Orange	Red	Yellow	Green
STS-52-16	-	0.1	Orange	Green	Red	Orange	Green	Green	Green	Red	Green	Red	Green	Green	Orange	Green	Green	Orange	Orange	Red	Green	Green	Orange	Green	Green	Green
SA-04-18	-	0.1	Orange	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red
SA-01-21	-	0.1	Orange	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red

Radlett

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
STS-51-23	GB Review recommended allocation (constant)	11.8	Yellow	Green	Orange	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	Orange	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
STS-51-21	-	20.1	Yellow	Green	Orange	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
STS-50-18	-	7.4	Yellow	Green	Orange	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
STS-50-21	-	5.2	Yellow	Green	Orange	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
STS-50-16	-	4.3	Yellow	Green	Orange	Red	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
STS-42-18	-	3.8	Yellow	Green	Orange	Red	Orange	Yellow	Green	Green	Green	Orange	Green	Green	Green	Red	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
STS-61-21	-	0.5	Yellow	Green	Orange	Red	Orange	Green	Green	Green	Green	Yellow	Green	Green	Orange	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green

### Harperbury Park

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
STS-34-21	Omission site but noted (see Figure 5.7)	92.9	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Red	Green	Red	Red	Red	Green	Green	Yellow	Red	Green	Orange	Yellow	Red	Green	Green
STS-34-18	-	141	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Red	Green	Red	Red	Red	Green	Green	Yellow	Red	Green	Orange	Yellow	Red	Green	Green
STS-33-17	-	46.0	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Red	Green	Yellow	Yellow	Green	Green	Green	Yellow	Red	Green	Orange	Yellow	Yellow	Yellow	Green
STS-33-18	-	10.6	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Red	Green	Orange	Yellow	Red	Yellow	Green
STS-16-21	-	4.1	Green	Green	Yellow	Red	Green	Orange	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Yellow	Red	Red	Green
LC-09-21	-	2.0	Green	Green	Yellow	Red	Green	Yellow	Green	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Red	Red	Orange	Yellow	Red	Yellow	Green

### Other areas<sup>51</sup>

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
CH-31-21	Permitted	5.2	Green	Green	Orange	Yellow	Green	Green	Green	Green	Orange	Green	Yellow	Green	Red	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Orange	Yellow
HR-09-18	-	157	Green	Red	Green	Red	Green	Green	Green	Green	Red	Green	Yellow	Yellow	Yellow	Red	Red	Green	Green	Red	Green	Yellow	Yellow	Yellow	Red	Orange
HR-07-18	-	111	Green	Red	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Red	Red	Red	Green	Green	Red	Green	Yellow	Yellow	Red	Red	Orange
RH-01-16	-	70.5	Green	Red	Green	Red	Green	Green	Yellow	Green	Orange	Green	Yellow	Red	Yellow	Red	Red	Green	Green	Red	Green	Green	Yellow	Green	Red	Orange
CH-14-21	-	43.5	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Orange	Green	Green	Yellow	Red	Green	Green	Red	Green	Red	Red	Orange	Orange	Yellow	Green	Green
CH-02-18	-	25.1	Green	Green	Orange	Orange	Green	Green	Green	Green	Orange	Green	Green	Yellow	Red	Green	Green	Green	Green	Red	Red	Orange	Orange	Yellow	Orange	Green
STS-25-21	-	22.5	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Orange	Green	Green	Yellow	Red	Green	Red	Orange	Red	Green	Orange	Orange	Red	Red	Green
CH-26-21	-	18.8	Green	Green	Orange	Orange	Yellow	Green	Green	Green	Orange	Green	Green	Yellow	Red	Green	Green	Green	Green	Red	Green	Orange	Yellow	Orange	Red	Green
CH-06a-21	-	18.0	Green	Green	Yellow	Red	Green	Green	Green	Green	Green	Yellow	Orange	Green	Green	Green	Green	Red	Yellow	Red	Red	Orange	Yellow	Green	Green	Green

<sup>51</sup> Note that the HELAA refs indicate location, with the acronyms: CH for Colney Heath; HR for Harpenden Rural; RH for Redbourn/Harpenden; STS for St Stephen; and WH for Wheathampstead

HELAA ref.	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Sched. monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood cen.	Secondary school	Primary school	Multiple deprivation
STS-40-18	-	16.7	Green	Green	Red	Red	Green	Green	Green	Green	Orange	Orange	Green	Green	Red	Red	Green	Green	Red	Red	Orange	Orange	Red	Red	Orange	
CH-06b-21	-	13.1	Green	Green	Yellow	Red	Green	Green	Green	Green	Orange	Orange	Orange	Green	Green	Green	Green	Green	Green	Red	Red	Yellow	Green	Green	Orange	Green
CH-03-21	-	10.6	Green	Green	Yellow	Orange	Green	Green	Green	Green	Orange	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Red	Orange	Orange	Yellow	Red	Green
RF-01f-21	-	9.4	Green	Green	Red	Red	Green	Green	Green	Green	Orange	Orange	Green	Green	Red	Green	Green	Green	Green	Red	Red	Orange	Orange	Red	Red	Orange
CH-37-21	-	7.7	Green	Green	Orange	Red	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Red	Yellow	Red	Green	Orange	Orange	Red	Orange	Green
HR-01-18	-	7.5	Green	Red	Green	Green	Green	Green	Green	Green	Orange	Green	Yellow	Green	Green	Green	Red	Green	Yellow	Red	Green	Yellow	Orange	Red	Red	Orange
RF-01e-21	-	5.4	Green	Green	Red	Red	Green	Yellow	Green	Green	Orange	Orange	Green	Green	Green	Red	Green	Green	Red	Red	Green	Orange	Orange	Red	Red	Orange
CH-23-21	-	5.2	Green	Green	Orange	Red	Orange	Green	Green	Green	Yellow	Green	Green	Green	Orange	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Yellow	Green
CH-04-21	-	4.3	Green	Green	Yellow	Orange	Yellow	Green	Green	Green	Orange	Green	Green	Yellow	Green	Green	Green	Green	Green	Red	Red	Orange	Yellow	Red	Green	Green
HR-03-18	-	3.9	Green	Red	Green	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Red	Red	Red	Orange	Red	Green	Yellow	Orange	Red	Orange	Green
CH-17-21	-	3.9	Green	Green	Orange	Green	Green	Green	Green	Green	Orange	Green	Green	Green	Green	Green	Green	Green	Orange	Red	Green	Orange	Orange	Orange	Orange	Green
CH-22-18	-	3.6	Green	Green	Orange	Red	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Green	Red	Green	Red	Red	Orange	Orange	Red	Yellow	Green
CH-22-21	-	3.2	Green	Green	Orange	Red	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Green	Red	Green	Red	Red	Orange	Orange	Red	Yellow	Green
STS-59-21	-	2.1	Yellow	Green	Red	Yellow	Green	Red	Yellow	Green	Orange	Orange	Green	Green	Yellow	Red	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Orange
WH-29-21	-	1.6	Green	Green	Orange	Orange	Green	Green	Green	Red	Green	Red	Yellow	Red	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Orange
STS-15-21	-	1.3	Green	Green	Orange	Green	Yellow	Green	Green	Green	Orange	Orange	Green	Green	Orange	Red	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
CH-24-21	-	1.2	Green	Green	Orange	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Orange	Green
STS-15-18	-	1.2	Green	Green	Red	Green	Green	Green	Green	Green	Orange	Orange	Green	Green	Orange	Red	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
CH-07-21	-	1.1	Green	Green	Yellow	Red	Red	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Orange	Green
HR-04-18	-	1.1	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green	Green	Red	Green	Yellow	Orange	Red	Red	Orange
CH-07a-16	-	0.9	Green	Green	Yellow	Red	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Orange	Orange	Yellow	Orange	Green
CH-21-18	-	0.9	Green	Green	Orange	Red	Green	Green	Green	Green	Yellow	Green	Green	Green	Orange	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Green	Green
STS-43-21	-	0.6	Green	Green	Red	Yellow	Green	Green	Green	Green	Orange	Orange	Green	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green
STS-39-18	-	0.4	Green	Green	Red	Orange	Yellow	Green	Green	Green	Orange	Orange	Green	Green	Yellow	Green	Green	Red	Green	Red	Green	Orange	Orange	Red	Red	Orange
CH-07b-16	-	0.2	Green	Green	Yellow	Red	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Green	Green	Green	Red	Green	Orange	Orange	Orange	Yellow	Orange	Green
CH-32-17	-	0.1	Green	Green	Orange	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Orange	Orange	Red	Red	Green