

Summary of Landowner and Agent Responses to the Emerging Core Strategy

Chapter 5 – Vision for the Core Strategy

Issue:	Respondent:	Summary of response:
Rural Vision	Burhill Golf & Leisure Ltd	Broadly agree with the rural vision.

Chapter 6 –Core Strategy Objectives (Q1/A1)

Issue:	Respondent:	Summary of response:
Objectives	Burhill Golf & Leisure Ltd	Broadly agrees with objectives
SO1 manage and improve the green belt		
SO2 Protect the natural and historic assets		
SO3 Provide sufficient land for development at suitable locations	Tetlow King Planning on behalf of London and Cambridge Properties	Strongly support Strategic Objective 3
SO4 delivering high quality distinctive design		
SO5 Establish St Albans as a hub for recreation, culture, leisure, heritage and tourism		
SO6 provide more affordable homes	Barton Willmore on behalf of Newlyn Developments Ltd	Suggests rewording the Objective to better reflect PPS3 (para 20-24). "Provide a mix of good quality new homes, including affordable homes, to meet the diverse needs of the District's population and to contribute to creating balanced and sustainable communities".
SO7 diversify the local economy and develop economic competitiveness		
SO8 improve the vitality and viability of St Albans		
SO9 improve the vitality and viability of all centres		
SO10 support		

sustainable travel and reduce car usage		
SO11 create strong communities	Barton Willmore on behalf of Newlyn Developments Ltd	Support this Objective in particular the recognition for the need to provide for the ageing population.
SO12 development contributes to the mitigation and adaptation to climate change		
SO13 Delivery of the strategy		
Other comments	Entec on behalf of The Crown Estate	The Core Strategy should focus much more on the positive aspects of growth. It should recognise the benefits of growth, in terms of meeting the need for more market and affordable housing, employment land and ensuring that settlements remain vibrant by having sufficient growth to ensure that facilities and services can be supported.
	Shire Consulting	Objectives are too general and not appropriate for effective monitoring.
	Southern Planning Practice on behalf of The Primrose Property Trust	The top objective and priority must be to ensure there is enough land available to meet the housing, employment, retail, leisure and community needs of the District.

Chapter 8 – Environment Sustainability Policies

Issue:	Respondent:	Summary of response:
Renewable and low carbon energy		
Sustainable design and construction	Debenhams Ottaway Solicitors on behalf of Alban Developments Ltd.	There needs to be a level playing field throughout the country, rather than an individual approach from district to district.
Water and flood risk		
Air quality		

Chapter 9 – Green Belt Policies

Issue:	Respondent:	Summary of response:
	Barton Willmore on behalf of Newlyn Developments Ltd	Full and proper consideration should be taken to review the Green Belt boundaries around sustainable settlements.
	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Support the approach to review Green Belt boundaries for the period to 2031.
	Debenhams Ottaway Solicitors on behalf of Mr J Brew	The area of Hatching Green, north of the Redbourn Road, is shown in the current District Plan as Metropolitan Green Belt despite its inclusion in Conservation Area No 1 Harpenden. This is anomalous. The anomaly is reinforced by the redevelopment of the former MAFF research facility for residential purposes, a significant change to the locality.
	Shire Consulting	The document should address the anomaly within the urban area of St Albans of large residential areas still covered by a Green Belt designation. Paragraph 9.6 ignores the possibility that the RSS review may revisit the issue of St Albans making a contribution to meeting the housing requirements of other Districts.
	Southern Planning Practice on behalf of The Primrose Property Trust	Should plan to release smaller-scale housing sites.
	Tribal on behalf of SEGRO plc	The Core Strategy should include a re-definition of boundaries, where their re-definition would provide a more defensible boundary in accordance with the requirements for sustainable development.
	RPS on behalf of Bowmans Leisure Ltd – the owners of Willows Farm Village	In order to fulfil the requirements of PPG2, it will be necessary for the Council to undertake a comprehensive green belt review for all of its area.
	Smiths Gore on behalf of Action for Children	It is not <i>likely</i> that some development in the Green Belt will be necessary – it is a clear <i>certainty</i> .
	Tetlow King Planning on behalf of London and Cambridge Properties	Quality rather than quantity must be the overriding factor in determining decisions on Green Belt land release.

Chapter 10 – Housing Policies (Q3/B1 – density) (Q4/B2 – AOS1, AOS5) (Q5/B3 – AOS3, AOS8, AOS7) ((Q6/B4 – AOS4, AOS6, AOS2, AOS8) (Q7/B5 – affordable hsg) (Q8/B6 – gypsies and travellers)

Issue:	Respondent:	Summary of response:
Housing targets and long term green belt boundaries	Banner Homes.	Land between Mayne Avenue and Bedmond Lane, St Albans. There is a danger that an overly zealous approach to protecting the green belt could lead to potential sustainable development opportunities being overlooked. A proper review of green belt boundaries around large sustainable settlements is needed. This is consistent with the emerging core strategy which acknowledges the need to release some green belt land. We agree with the council that there is a convincing case to review the green belt through the LDF.
	London School Hygiene & Tropical Medicine	Beaumont School, Wynches Farm & AOS 5 We agree with the council that there is a convincing case to review the green belt through the LDF.
	Burhill Golf & Leisure Ltd	Aldwickbury and Redbourn Golf Courses. Any review of green belt boundaries to accommodate development to meet the EEP requirements should consider land west of Harpenden at Redbourn golf club.
	Barton Willmore on behalf of Cemex UK Properties	Core Strategy should consider the expansion of Hemel Hempstead and Welwyn Garden City/Hatfield. Without which the document is unsound, as it is not “justified”, “effective” or “consistent with National Policy” Core Strategy should consider the implications of the East of England Plan Review process and possible expansion of Welwyn/Hatfield into the District. The Council should prepare a delivery strategy that provides for robust economic growth with a flexible supply of land for business and residential purposes.
	Barton Willmore on behalf of Newlyn Developments Ltd	The Core Strategy should be amended to include the land West of Chiswell Green as a proposed housing site (retirement village).
	Barton Willmore on behalf of Newlyn Developments Ltd	Agree that there is a convincing strategic case for a review of the Green Belt through the LDF.
	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Support minor adjustments to the Green Belt to accommodate non-strategic sites. Such sites should be identified through the Site Allocations DPD and these should focus on appropriate releases of Green Belt land in sustainable locations. Suggest that the Apriary site, Hatching Green would be an appropriate site to consider given its proximity to Harpenden High Street.
	Debenhams Ottaway Solicitors on behalf of Mr & Mrs C Barker	Suggest that the general public is more likely to find smaller releases of the Green Belt more palatable than Areas of Search.
	Debenhams Ottaway Solicitors on behalf of Alban Developments Ltd	The Council's approach appears to be to manage the release of land so that the figures are seen as targets not to be exceeded. This is contrary to the approach adopted within the Regional Plan.
	Entec on behalf of The	The consultation document fails to correctly reflect cross boundary issues. At Hemel Hempstead, the tightly

	Crown Estate	<p>drawn local authority boundary is likely to necessitate some development into St Albans in the medium to long term. St Albans should not prevent Dacorum from considering the most sustainable options for growth by not addressing cross boundary issues.</p> <p>If Dacorum apply the same approach that St Albans itself is taking, by looking at sustainable options for growth around key settlements up to 2031, then there may be a need for growth to the east of Hemel Hempstead into St Albans.</p>
	Maddox & Associates on behalf of Goodman (owner and developer of Hatfield Business Park)	The Core Strategy should not defer consideration of additional sites to accommodate the shortfall of housing delivery to the Pre-Submission stage document. Deferring the consideration of options means that proper consultation of all reasonable alternatives cannot be undertaken at the outset.
	Maddox & Associates on behalf of Goodman (owner and developer of Hatfield Business Park)	The Core Strategy should consider all reasonable alternatives. This includes the testing of land to the west of Hatfield Business Park in St Albans District that may be suitable for housing and related development if a proposed change / partial review of the adopted RSS requires it.
	Shire Consulting	The RSS housing figures are minimum requirements and these may increase as part of the current review of the RSS.
	RPS on behalf of Bowmans Leisure Ltd – the owners of Willows Farm Village	It is inadequate to leave green belt boundary adjustments, albeit minor, to a Site Allocations DPD. They should be addressed properly at the Core Strategy stage.
	Rippon Development Services on behalf of BT plc and Telereal Services Ltd.	The option for Hatfield to grow into St Albans district should be kept open until the repair process is complete.
Housing land supply calculations	Banner Homes.	<p>Land between Mayne Avenue and Bedmond Lane, St Albans.</p> <p>The allowance for windfall should be removed in favour of specific sites. The SHLAA shows availability of enough deliverable and developable sites in the plan period.</p>
	Barton Willmore on behalf of Newlyn Developments Ltd	The allowance for windfall sites should be removed in favour of specific sites.
	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	The inclusion of a significant proportion of windfall sites in the period from 2011 onwards is very optimistic. It is not robust to assume such high rates of delivery and does not meet the requirements of PPS3.
	Countryside Properties plc and CP Holdings	<p>Object to windfall allowance in housing supply calculations. The Council's case in justification for including a windfall allowance does not constitute robust evidence of genuine local circumstances.</p> <p>Unimplemented Local Plan allocations should be scrutinised against the tests of PPS3 i.e. deliverability.</p>

	Countryside Properties (agent Molyneux Planning)	The reliance on windfall is contrary to government guidance.
	Entec on behalf of The Crown Estate	Regional housing figures are all minimum figures to achieve.
	Knight Frank on behalf of Translink London Ltd	Do not support the reliance on windfalls allowance for the first 10 years. It represents not only a break with established policy but also with the theoretical underpinnings of the development planning process.
	Maddox & Associates on behalf of Goodman (owner and developer of Hatfield Business Park)	There is no justification for having a windfall allowance in addition to the SHLAA, particularly in the first ten years of land supply.
	Shire Consulting	The use of windfall to meet shortfall is unacceptable.
	Southern Planning Practice on behalf of The Primrose Property Trust	Delete the small site windfall allowance of 700 dwellings between 2011 and 2021. Include an allowance for the development of smaller-sized housing sites in the Green Belt in order to provide a wider range of development sites.
	JB Planning Associates on behalf of Beechwood Homes Ltd.	The inclusion of windfall is flawed and inconsistent with the guidance in PPS3.
	JB Planning Associates on behalf of Hilton House Properties Ltd	The inclusion of windfall is flawed and inconsistent with the guidance in PPS3.
	JB Planning Associates on behalf of Marchfield Developments Ltd	The inclusion of windfall is flawed and inconsistent with the guidance in PPS3.
	Smiths Gore on behalf of Action for Children	Fundamentally disagree with the inclusion of windfall allowance for the first 10 years of land supply.
	Tetlow King Planning on behalf of London and Cambridge Properties	In relation to windfall the Council has been over ambitious with its prediction of 70 windfall units per annum up to 2021 and a further 100 units per annum from 2021 – 2031. The Council has not properly demonstrated that genuine local circumstances exist.
	Hallam Land Management	The inclusion of windfall in the housing numbers cannot be justified. Within the plan period, 2011-2026, the District Council is planning for a shortfall of at least 1270 units simply to meet the minimum housing target. Phasing strategic releases to the end of the plan period will only frustrate delivery.
	Burhill Golf & Leisure Ltd	Aldwickbury and Redbourn Golf Courses. SHLAA should acknowledge that the strategic release of green belt could be a more sustainable form of development than brownfield land.

		The release of green belt sites for housing is supported. A more flexible approach for identifying potential sites should be considered.
	Notcutts Garden Centre	A considerable amount of green belt land would need to be released to meet housing requirements and the council has consistently underestimated this. Revised housing land assessment to 2031 is welcomed, however it still fails to comply with PPS3. There is uncertainty over delivery of some sites and the council's approach to windfall calculation does not comply with PPS3. The council do not have a 5 year land supply and the council is obliged to consider any proposals favourably. This is because committed sites are unlikely to yield increased units; SHLAA sites need to be properly tested and there is uncertainty over deliverability in some cases (Alma Road site which is being promoted for a supermarket; and AOS5 new college and housing which lacks necessary funding); and no allowance should be made for windfall. Current deliverable supply is 3.7 years.
	Mr & Mrs Pearson and Mrs Emerton	We object to the Council's approach to windfall sites which is contrary to PPS3.
Areas of Search and potential Housing sites:	Banner Homes.	Land between Mayne Avenue and Bedmond Lane, St Albans. The council's approach involving AOS1, AOS5, AOS7 & AOS3 is dependent on large urban extension sites which will rely on significant new infrastructure to come forward. Overdependence on large sites is inflexible and unrealistic. A policy should be included to release smaller sites from the green belt on the edge of sustainable settlements.
	Barton Willmore on behalf of Newlyn Developments Ltd	The Core Strategy is overly dependent on large urban extension sites which will require significant new infrastructure to come forward for development which would create significant obstacles to delivery. The Core Strategy should include a policy which allows for the release of appropriate smaller sites from the Green Belt on the edge of sustainable settlements, subject to the need for housing in the District. This would provide a fallback position during the plan period to compensate for complications with the delivery of the large strategic sites. The Core Strategy Issues and Options consultation found that there is less opposition in principle to minor adjustments to the Green Belt to accommodate growth.
	Cerda Planning on behalf of Antringham Verulamium	The Council could fulfil its housing requirements more sustainably by allocating more housing to urban areas, particularly the city centre.
	Entec on behalf of The Crown Estate	It is noted that a significant number of the sites included in the table of 'proposed housing sites' are proposed for fewer than 350 units. There is a concern that these sites may be too small to provide the necessary community facilities and services.
	Kirkby & Diamond on behalf of The Trustees of the estate of James Henry Frank Sewell	Support the approach set out in paragraphs 10.21 to 10.23 to consider where the shortfall of housing would be located on sites within the Green Belt.
	Indigo Planning on behalf of Sainsbury's Supermarkets Ltd	Further consideration is needed before new residential development at AOS2 and AOS4 is dismissed by the Council. Support the planned further consideration of development at AOS3.
	Smiths Gore on behalf of Action for Children	It is stated, in the settlement hierarchy, that development will be concentrated in the towns of St Albans, Harpenden and London Colney. However, in the case of Harpenden, the identification of strategic housing

		<p>sites completely fails to achieve this. Housing proposals are too heavily concentrated upon the southern half of the district (5,178-6,578) than the northern half of the district (400).</p> <p>The geographic distribution of future housing supply across the District seems illogical and totally skewed towards St Albans. The southern half of the district is generally more constrained in terms of the proximity to villages, the historic environment, nature conservation interests and traffic issues.</p>
<ul style="list-style-type: none"> • H1 – Oaklands City campus, St Albans 		
<ul style="list-style-type: none"> • H2 – St Albans City Station 		
<ul style="list-style-type: none"> • H3 – King Harry Lane Playing Fields, St Albans 	Hallam Land Management	Support the proposed allocation of land at King Harry Lane. The site can be relied upon to deliver housing early within the Core Strategy period and it is right therefore that it continues to be identified as an allocated site.
<ul style="list-style-type: none"> • H4 London Rd/Alma Road, St Albans 	Knight Frank on behalf of Translink London Ltd	Given the uncertainty over the future of this site it should not be included as a proposed strategic housing site for the period to 2026.
	DPP on behalf of Tesco Stores Ltd.	<p>Object to the inclusion of site H4 as a Proposed Strategic Housing Site.</p> <p>The SHLAA recognises that there is significant uncertainty over whether this site would ever be released for housing development as it is owned by Tesco Stores Ltd who are foodstore operators. The site should not be allocated for housing. Rather, it would be better placed to be identified as a windfall site.</p>
	Tetlow King Planning on behalf of London and Cambridge Properties	The inclusion of this undeliverable site at the expense of Option H7 means that the Core Strategy fails the tests of soundness as set out in PPS12.
<ul style="list-style-type: none"> • H5 Harperbury Hospital 	BNP Paribas Real Estate on behalf of the Department of Health and the Hertfordshire Partnership NHS Foundation Trust	Strongly support Harperbury Hospital which has been identified as a Proposed Strategic Housing Site for the period to 2026. The hospital facilities have become surplus to requirements due to changes in medical treatments leaving 50% of existing buildings vacant and redundant. The development will have an impact on a number of factors and mitigation measures are proposed including: retain important areas of vegetation and keep development within boundary of existing tree belts; extensive landscaping works are proposed; high quality soil and seed mix to improve grassland and phasing to provide new roosts for bats; new roundabout on Harper lane to serve development, and signal control at Radlett Road/Harper Lane junction, public transport improvements, improvement to pedestrian and cyclist facilities; noise from sources within the development e.g. fans will be controlled; ground water and contamination remediation works; improvement of sports pitches and provision of new sporting facilities; developer contribution to education; air quality will not be significantly affected.
	Knight Frank on behalf of Translink London Ltd	The site is inaccessible and removed, resulting in an entirely unsustainable transport location and has faced issues of land contamination.
	Maddox & Associates on behalf of Goodman	The Council acknowledges that some of the sites in its supply of housing land have 'considerable drawbacks' and are in an 'unsustainable location', for example Harperbury Hospital (350 homes). Therefore,

	(owner and developer of Hatfield Business Park)	the Council should consult on additional sites to allow for a flexible supply of housing land.
• H6 BRE, Garston	Highcroft Planning on behalf of BRE	A master plan has been prepared for 170-200 homes. It shows that trees in the developable area will be retained. The whole site should be taken out of the green belt to provide better townscape than might be achieved if it had to be contained in the existing building footprint. The BRE core zone provides for demolition of some outdated buildings and the construction of new office buildings, car parking and improved circulation. These redevelopment proposals are essential to BRE rationalisation programme and should be included in the pre-submission Core Strategy.
	Knight Frank on behalf of Translink London Ltd	The development would provide an unacceptable impact to local residents in terms of traffic generation.
• AOS1 south west of St Albans	Countryside Properties (agent Molyneux Planning)	Strongly support the allocation of AOS1 as a proposed strategic housing site. Capable of delivering housing and related facilities and resulting in wider benefits for the community.
	Hunston Properties Ltd	AOS 1 has major constraints and therefore is not deliverable or developable. It suffers constraints such as presence of minerals, high archaeological value, poor transport infrastructure, large loss of green belt land, coalescence issues. AOS7 – Land r/o Harpenden Road does not have these constraints.
	Countryside Properties plc and CP Holdings	Strongly support the allocation of Area of Search 1: South West of St Albans as a Proposed Strategic Housing Site for the period to 2026. Consider the site has the potential to deliver significant numbers of housing as part of a sustainable mixed use residential development and wider benefit to the District including a western orbital road, provision for primary school, a local centre generating employment, and significant areas of public open space and access to the countryside.
	PPML Consulting on behalf of Countryside Properties plc and CP Holdings	Strongly support the allocation of Area of Search 1: South West of St Albans as a Proposed Strategic Housing Site for the period to 2026 [same comments as developer/landowner above].
	Knight Frank on behalf of Translink London Ltd	Housing development at this location would be difficult to integrate with the existing settlement pattern and may be subject to noise from the adjacent A414. Despite proximity to the A414 there is no discernable access route nearby.
	Hallam Land Management	Highlight constraint and transport delivery issues relating to Area of Search 1.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr	Strongly oppose. The land immediately south of the A4147 and west of Bedmond Lane is an area of high archaeological importance. Therefore most of this site is unsuitable for development.

	Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
<ul style="list-style-type: none"> • AOS5 East of St Albans (south west part) Beaumont school playing fields 	London School of Hygiene & Tropical Medicine	<p>Beaumont School, Wynches Farm & AOS 5</p> <p>Support the proposal to release development from the green belt and provide approx 150 homes. We agree that the site contributes little to the green belt and the impact of development would be minor. The site is well related to the built up area and is accessible and in a sustainable location. Do not agree that development should wait until 2011 as this does not take account of the need to provide new and improved facilities for the school which needs enabling development. Additional information includes: development would not have any significant impact on important views; no significant effects on biodiversity; a proposed flood risk strategy has been devised which protects against risk of flooding, reference to the flooding issue should be deleted from the Core Strategy; the council assessment states a loss of public open space but the school pitches are not available for public use. The proposals include new sports pitches, sports hall and all weather pitch which would be available for community use, and this should be acknowledged by the council in their assessment.</p>
	Knight Frank on behalf of Translink London Ltd	Development of the site will have a number of traffic implications.
	Hallam Land Management	<p>Unless and until alternative provision is made for the existing playing fields this site can not be relied upon as a deliverable site.</p> <p>Issues relating to landscape, highways infrastructure and proximity to alternative modes of transport are also highlighted.</p>
	Strutt & Parker on behalf of Ayot Estate	Incorporates playing pitches which is directly contrary to the District strategy due to the shortfall in a number of playing fields identified in the district.
	DLA Town Planning on behalf of Mr Ansari, Mr	Strongly oppose.

	<p>Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton</p>	<p>This part of Hatfield Road already suffers from traffic congestion at peak times, which will be exacerbated by additional development in this area.</p>
AOS 5 (north part)	<p>Hallam Land Management</p>	<p>A number of issues relating to constraints, potential coalescence of settlements, sterilisation of mineral reserves and highways issues are raised.</p>
	<p>DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs</p>	<p>Strongly oppose.</p> <p>This area does not have good access to shops selling convenience goods and other facilities. This would encourage the use of the private car rather than promoting walking, cycling and other non-car modes of transport</p>

	Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
	Oaklands College	<ul style="list-style-type: none"> Funding from the Learning and Skills Council is no longer available to build the proposed new hub at Oaklands College Smallford Campus. This representation seeks 1000 - 1200 proposed homes on Oaklands land to be brought forward to 2011. This would allow the college hub development to be brought forward without delay. A masterplan has been devised which includes: housing including 35% affordable housing; educational links including a University Technical College; green links including green spaces and parks with public access, technical studies and timescale. Benefits include: college hub development; University Technical college for 14-19 year olds; primary and secondary school provision; sports facilities; parks and green spaces; community access and facilities including provision for teenagers/ children, public rights of way, community centre, college facilities available at the weekend, arts cinema, martial arts, allotments; landscape and woodland; improved public transport provision.
	Hunston Properties Ltd	<p>AOS 5 has major constraints and therefore is not deliverable or developable. It suffers constraints such as presence of minerals, high archaeological value, poor transport infrastructure, large loss of green belt land, coalescence issues.</p> <p>AOS7 – Land r/o Harpenden Road does not have these constraints</p>
Proposed safeguarded Land:		
<ul style="list-style-type: none"> AOS7 North of St Albans 	Hunston Properties Ltd	<p>Land rear of Harpenden Road , St Albans</p> <p>This site is 5.1ha and is deliverable and developable.</p> <p>Benefits of the site include: new sports pitches for STAGS which would allow the school to expand, new cycle path from Sandridgebury Lane to Harpenden Road, restoration of a pond set within public open space, immediate provision of 14 affordable homes using an extant permission in central St Albans.</p> <p>The site enjoys excellent access to a range of local services and facilities. Also it suffers none of the constraints of AOS 1 & AOS 5 such as presence of minerals, high archaeological value, poor transport infrastructure, large loss of green belt land, coalescence issues, & ecology.</p>
	St Albans Girls School (STAGS)	<p>Land rear of Harpenden Road.</p> <p>Hunston Properties development of c12 acres north of the school would provide the following benefits: Sports facilities on the development site for use by STAGS, if it included netball and tennis then STAGS could relocate sports facilities and provide additional building on the school site such as a 6th form block; A roof to make the existing swimming pool an indoor facility allowing year round use by students and community; traffic calming and/or safe crossing between the school and the development site to allow safe access to new sports provision; Affordable housing will make recruitment and retention of staff easier.</p>
	Knight Frank on behalf of Translink London Ltd	Residential development would sit incongruously with the surrounding area. A number of traffic issues.

	Kirkby & Diamond on behalf of The Trustees of the estate of James Henry Frank Sewell	Support is given for the inclusion of Area of Search 7 in the Core Strategy. Support the view that some development may be necessary pre 2026 as indicated in paragraph 10.29.
	Hunston Properties Limited on behalf of St Albans Girls' School	Land to the rear of Harpenden Road (site 77 in the SHLAA), would deliver a number of planning gains and is deliverable within the timeframes of 2009-2011 or 2011-2016.
	Hallam Land Management	Support Area of Search 7 and state that the site is the most deliverable option available. The site has the potential to incorporate a mix of uses, including some employment land, a food store and new primary school as required, community uses and green infrastructure.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	Strongly support. AOS: 7 is a suitable site for residential development as it is well related to the existing built-up area and would not result in the coalescence of St Albans and Harpenden. The southern most part of this site is available for immediate release
Possible additional green belt releases:		
• AOS3 west of London Colney	Knight Frank on behalf of Translink London Ltd	Promoting land to the north west of Napsbury Hospital for housing provision. Consider that this land should be included as a strategic site to come forward pre 2026 as it is a deliverable site.
	Vincent And Gorbings on behalf of Hertfordshire	The completion of phase 1 technical and environmental investigations, have concluded that an overall maximum development of up to 600 residential and possibly a 2 form entry primary school could be

	County Council (property)	accommodated on land north and south of Napsbury.
	Hallam Land Management	The landscape, heritage, and highways constraints of this site are highlighted.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	Strongly oppose.
• AOS8 North of Harpenden (south part)	Smiths Gore on behalf of Action for Children	This land should be removed from the Green Belt at an earlier date to deliver housing for a variety of reasons not least the Council's own Sustainability Appraisal.
	Hallam Land Management	Constraints relating to congestion, education provision and setting in relation to a Grade II Listed Farm Complex are highlighted.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr	Strongly oppose.

	Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
<ul style="list-style-type: none"> H7 East of Redbourn 	Tetlow King Planning on behalf of London and Cambridge Properties	<p>H7 should be promoted from a possible Green Belt release for safeguarded housing post-2026, to an allocated site for pre-2026 mixed use development.</p> <p>The site does not meet the five tests set out in PPG2 and the 2003 Green Belt Boundary Review and the Inspector at the most recent Local Plan Inquiry concluded, the bypass and Nickey Way provides the most defensible and permanent boundary. Development would improve an unattractive piece of land which does not meet the criteria for Green Belt land.</p>
<ul style="list-style-type: none"> H8 Nicholas Breakspear School , London Colney Heath Lane, St Albans 		
Housing Sites no longer proposed:		
<ul style="list-style-type: none"> AOS2 South east of St Albans (south west part) 	Leach Homes	<p>AOS2</p> <p>This site is proposed for employment and has been rejected for housing development. This is because of coalescence between St Albans and London Colney and because the site is better used as a High quality business park rather than housing.</p> <p>The brochure shows a site layout and observes the following: St Albans Orbital acts as a permanent barrier between St Albans and London Colney; frontage development exists along the orbital road in the vicinity of London Road; the southern parcel is proposed for hotel and park and ride which will retain a sense of openness; development would maintain the wide and sylvan approach to St Albans; cross-sections show how the boulevard approach will be preserved. Low density residential development is shown on site c which will complement existing and proposed development.</p>
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard	<p>Strongly disagree with rejection of this site.</p> <p>AOS: 2 South East of St Albans This area is surrounded by built development and is well related to the</p>

	Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	existing built-up area. The A414 would create a more defensible Green Belt boundary. The area is also well served by public transport and represents a sustainable location for further residential development.
• AOS4 south of London Colney	Sanderson Weatherall on behalf of Manheim Auctions Limited	Consider that it is premature to reject housing development on the site outright. Consideration of the site appears to be based on the entire area of land and does not sufficiently assess the potential for development of specific parts of the site with landscape enhancement of the remainder of the land. Part of land fronting Shenley Lane is currently in use as a car auction site and this element comprises previously developed land in its entirety.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates	Strongly agree with rejection.

	PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
• AOS6 Smallford	Notcutts Garden Centre	<p>AOS6 – Notcutts garden centre at Hatfield Road.</p> <p>The Council should reconsider their approach to this site as it provides an opportunity to accommodate growth on land which is actively used and occupied by visually intrusive structures, and to provide benefit to the openness and amenity of the green belt. This site is preferable to untouched green belt land elsewhere in the district.</p> <p>The Notcutts site should be considered in its own right. This site is previously developed land and represents a preferred location for new housing development. The SHLAA shows a shortage of PDL and green field sites are being considered. Notcutts site can reduce green field requirement. The site can accommodate approx 50 homes and will enhance the green belt with increased landscaping and a reduction of hardstanding compared to the existing use.</p> <p>This is a sustainable brownfield site and the council are invited to remove it from the green belt. This proposal would realise the advantages of AOS6 but not the disadvantages.</p> <p>Built development on the site would be smaller scale than existing and would provide an opportunity for enhancement. Similar approach are acceptable at BT Trial site and Radio Nursery. It is an appropriate source of housing and complies with para 10.13 which makes specific reference to replacing existing buildings in the green belt such as industrial and nursery garden sites.</p> <p>Recent attempts to improve viability of the current operation have been thwarted by the council. It is requested that this site be considered for housing, it is available, suitable, achievable, and therefore a deliverable source of much needed housing land.</p>
	BT plc & Telereal Services Ltd	<p>BT Trial site, Oaklands Lane, Smallford.</p> <p>Object to the ECS housing strategy. Disappointed that the expansion of Smallford is rejected. At this time it is irresponsible for the Council to assume that Hatfield's need to expand into the greenbelt will be deleted and to rule out major development in this part of the district.</p> <p>Smallford is in an accessible location and there are a number of previously developed sites which are available for development in the area including this site.</p> <p>The council should consider a comprehensive planning strategy of land at the eastern area including AOS 5, AOS 6 and other sites such as this site. It would address separation of settlements, strategic open space, community facilities and sustainable transport.</p> <p>This site is 14.86ha and could provide 300 – 350 dwellings, open space and landscaping, community facilities and highway improvements.</p> <p>The SHLAA assessment is spurious for the following reasons: Any green belt land release will involve encroachment into the countryside; any development is bound to be</p>

		<p>seen from the surrounding countryside, however openness and visual impact can be mitigated with careful design and landscaping; any large scale release would have a significant impact on adjoining settlements but Smallford does not have a distinctive character and this development would provide scope for enhancement; extension on the north side of Hatfield Road would minimise the impact on openness because separation between settlements is greatest in this area; Major development at this site has potential to provide significant environmental and social benefits including affordable housing, community facilities, highways and transport, and new public open space.</p> <p>The ECS document ignores the RSS context and this is unsatisfactory and contrary to proper planning in the area. There is a real danger that the chosen strategy will not accord with the final RSS and will be found unsound.</p>
	Stackbourne Ltd	<p>Land at Smallford Works Objects to the Council's decision to reject AOS6. 87% of housing requirement is concentrated at St Albans, and we think that benefits needs to be spread more widely.</p> <p>The analysis recognises that there are some clear advantages to developing here, the land is not open countryside and there are elements of previously developed land. This previously developed land should have priority over greenfield land releases. The approximate capacity is 100 homes. This excludes land for landscaping and flood plain protection. Highway scheme has now been implemented. The replacement of poor quality industrial units with well designed housing is a visual enhancement. Cycle routes and bus sites run close to the site. The site should be considered for housing and a masterplan has been prepared.</p> <p>Strongly disagree. Smallford is a sustainable location for housing. Smallford Works is a previously developed site where housing would enhance the Green Belt.</p>
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy	<p>Neither agree nor disagree.</p> <p>AOS: 6 Smallford This area contains elements of previously developed land and does not perform a Green Belt function. Additional development would support existing facilities and be able to support new services and facilities. The area is also well served by public transport.</p>

	Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
	Debenhams Ottaway on behalf of Mr & Mrs C Barker	Promoting Chester Nursery for development.
• AOS8 North of Harpenden (north west part)	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	Strongly agree with rejection of this site.
Housing Density	London School Hygiene & Tropical Medicine	Beaumont School, Wynches Farm & AOS 5 If local density policy is included it should not be prescriptive and must give significant weight to making efficient use of land, especially in and adjoining main urban areas well related to transport corridors and good public transport.
	Cerda Planning on behalf of Antringham Verulamium	Higher densities in built up areas and less development on green field sites is the most appropriate strategy for the district when considered against the reasonable alternatives and is therefore sound.
	Strutt & Parker on behalf of Ayot Estate	Option Two is favoured – lower density in built up areas and some development on green field sites
	Southern Planning	Density standards are too high and will result in predominantly flats being built. A figure of 35-40 dph in the

	Practice on behalf of The Primrose Property Trust	urban areas and 30 dph in the suburbs and villages is proposed.
	Hallam Land Management	Need to recognise that demand is for family housing. High density development has resulted in a shortage of this type of housing.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	Support lower density in built up areas and some development on green field sites. Building at a higher density in built-up areas would lead to some sites being overdeveloped, which would put a strain on existing services and exacerbate existing problems with congestion. This would be contrary to the City Vision of creating an attractive and safe environment for visitors and residents. Consequently, some greenfield sites will be required to ensure good design and attractive new development
	Burhill Golf & Leisure Ltd	Aldwickbury and Redbourn Golf Courses. Housing needs and density should be determined on a site by site basis to ensure that development caters for housing needs effectively.
	Drivers Jonas on behalf of Legal and General	Support the principle of high density development in sustainable locations to maximise the potential of development sites.
Housing Mix and Tenure	McCarthy and Stone	'Lifetime Homes, Lifetime Neighbourhoods' published 2008 identifies that we need adequate provision of accommodation for older people in the right kinds of sustainable communities including extra care housing. A proactive approach is needed with robust evidence and strategic policies are needed to meet the housing needs of older people. Suggest that policy or criteria are added which supports the provision of sheltered and extra care housing with commitments in supporting text to allocate sites or part of sites for older person accommodation to ensure deliverability. An example policy at Mole Valley is attached.

	Barton Willmore on behalf of Newlyn Developments Ltd	Housing policies should reflect the need to meet the housing needs of the whole community, including housing for the elderly. The Core Strategy should recognise the ageing population in the District and include a policy to meet the accommodation needs of the frail and elderly.
Affordable Housing	London School of Hygiene & Tropical Medicine	Affordable housing targets should reflect robust assessment of the economic viability and impact on deliverability. The SHMA and viability assessment have not been published and therefore neither 35% or 40% can be justified.
	Burhill Golf & Leisure Ltd	The importance of affordable housing is recognised and would encourage an approach based on a site by site basis and not restricted to thresholds.
	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Support the approach of awaiting the findings of the SHMA prior to determining the approach to affordable housing.
	Countryside Properties (agent Molyneux Planning)	The regional policy for 35% affordable housing should be accepted. There are other requirements placed on the development and a balance needs to be reached as to potential benefits to a wider community.
	Countryside Properties plc and CP Holdings	The Council should accept a 35% target for affordable housing based on the regional policy. The policy should build in flexibility if the developer can prove that the proportion is not viable.
	Cerda Planning on behalf of Antringham Verulamium	The Council should accept 35% provision based on the regional policy. However, the policy should make clear that there will be exceptions where 35% affordable housing may not be appropriate on sites (Circular 05/2005).
	Strutt & Parker on behalf of Ayot Estate	The Council should adopt the regional average.
	Smiths Gore on behalf of Action for Children	Support 35% target. The low housing targets for Harpenden means there will be almost no affordable housing provided for the town.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge	The Council should accept 35% based on the regional policy.

	Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
	Drivers Jonas on behalf of Legal and General	The Council should adopt a flexible approach to affordable housing provision on a case by case basis to ensure the economic viability of schemes.
Gypsies Travellers and Travelling Show people		
Other Suggested Sites for development	CB Richard Ellis on behalf of HSBC	Would like the Core Strategy to reference that the Management Training College, Smug Oak Lane, Bricket Wood could accommodate 180 dwellings.
	Banner Homes.	Land between Mayne Avenue and Bedmond Lane, St Albans. Support the AOS1 but note that it is dependent on the new western orbital route which the Highways Agency has yet to comment on. Our site could provide a substantial number of homes and could be delivered without the western orbital route. The site is 6ha. 3.5 ha is suitable for development which could provide 120 homes. The rest of the site would be landscape and public open space. Advantages include: development would not lead to coalescence; this is not a highly sensitive location and development would not be visually intrusive; it is well related to the urban area and has a limited role in safeguarding the countryside; Bedmond Lane would form a logical defensible boundary; development could contribute to open space provision; the site has access to a bus service and key local facilities. The site is available, deliverable and developable. It should be identified independently in a similar way to AOS 5.
	CGMS Consulting on behalf of Astico Holdings Ltd.	Promote Poplars Field (west of Harperbury Hospital) for housing development.
	Cerda Planning on behalf of Antringham Verulamium	Propose that the Civic Centre south site in St Albans is included as a strategic allocation able to accommodate 100 or more units.
	Entec on behalf of The Crown Estate	Promoting the Crown Estate's land to the west of the M1 at Hemel Hempstead for development.
	Strutt & Parker on behalf of the Ayot Estate	Promoting land south east of Wheathampstead, adjoining the Hilldyke Estate as an Area of Search with the potential to accommodate 110 dwellings in an immediately deliverable timeframe.
	RPS on behalf of Bowmans Leisure Ltd – the owners of Willows	Promoting land on the north-western edge of the Willows Farm Village estate, bounded by the A414 North Orbital Road, the A1081 London Colney Bypass and White Horse Lane as a potential sustainable urban extension to London Colney.

	Farm Village	
	Palmer Land & Industry	Promoting Property Spy Land west side of Harpenden Road, St Albans for residential development (large number of plots).
	Mr O'Cuinneagain	Land west of Harpenden Road The site could accommodate approx 200 homes. It should be released from the green belt because there is a need to provide suitable locations for future development; the site is well related to the existing pattern of development; the boundary adjustment would not harm the purposes of the green belt and would aid the performance of long term MGB.
	Mr Rafter	Land west of Harpenden Road The site could accommodate approx 200 homes. It should be released from the green belt because there is a need to provide suitable locations for future development; the site is well related to the existing pattern of development; the boundary adjustment would not harm the purposes of the green belt and would aid the performance of long term MGB.
	Burhill Golf & Leisure Ltd	Aldwickbury and Redbourn Golf Courses. Aldwickbury golf course located east of Harpenden at Piggotshill Lane with total area 5.9ha. Redbourne golf course located west of Harpenden on Kinsbourne Green Lane with a total area 5.27 ha. Homes, hotel or Golf and Country club may be appropriate.
	Lazenby Architects	All Saints Pastoral Centre, Land south of AOS3, London Colney. Residential development is supported on this site. It does not give rise to ribbon development; the site provides a self contained area of residential development cushioned by surrounding farmland and landscaping would be enhanced at the boundary. The proposed development is sympathetic to the adjacent Pastoral Centre which is a grade 1 Heritage site and would aid restoration of the heritage site which would otherwise fall to wreck and ruin. The development would provide approx 270 units and a masterplan has been produced. This site does not have the disadvantages of AOS3. It would not require significant road improvements and the proposals would include the reinstatement of a pre-existing bus route to serve the development. The proposed development would not impact on the existing conservation area and refurbishment would complement it.
	Mr & Mrs Pearson and Mrs Emerton	Land at Alpha, 91 Mayflower Rd, Park Street This land should be considered alongside submission for Burston Garden Centre. The sequential test has not been followed and insufficient weight has been given to previously developed land (PDL) and too much reliance on large scale undeveloped green field sites. In accordance with PPS3 sequential approach priority should be given to PDL within green belt before considering undeveloped Greenfield sites in the green belt. Harperbury Hospital and BRE total 500 and not 550 as shown in the ECS document. This site together with Burston Garden Centre could provide 150 – 200 homes on PDL whilst reducing the amount of buildings structures and hardstanding and enhancing the openness of the green belt. The site could be serviced from existing access on the North Orbital Road and would not be detrimental to the local road network. Comprehensive redevelopment could include setting back from North Orbital Road and provide a green lung.

		<p>Land in same ownership to the southwest and southeast could provide open space and public access as part of the Watling Chase Community Forest. Improved access to green belt countryside for the local community.</p> <p>It will enhance the setting of grade II listed building at Burston Manor.</p> <p>It is an adequate sustainable location with walking access to bus services local shops and facilities.</p>
	Mr & Mrs Pearson	<p>Burston Garden Centre</p> <p>This land should be considered alongside submission for Land at Alpha, 91 Mayflower Rd, Park Street</p> <p>The sequential test has not been followed and insufficient weight has been given to given to previously developed land (PDL) and too much reliance on large scale undeveloped green field sites. In accordance with PPS3 sequential approach priority should be given to PDL within green belt before considering undeveloped greenfield sites in the green belt.</p> <p>Harperbury hospital and BRE total 500 and not 550 as shown in the ECS document.</p> <p>This site together Land at Alpha, 91 Mayflower Rd, Park Street could provide 150 – 200 homes on PDL whilst reducing the amount of buildings structures and hardstanding and enhancing the openness of the green belt.</p> <p>The site could be serviced form existing access on the North Orbital Road and would not be detrimental to the local road network.</p> <p>Comprehensive redevelopment could include setting back form North Orbital Road and provide a green lung.</p> <p>Land in same ownership to the southwest and southeast could provide open space and public access as part of the Watling Chase Community Forest. Improved access to green belt countryside for the local community.</p> <p>It will enhance the setting of grade II listed building at Burston Manor.</p> <p>It is an adequate sustainable location with walking access to bus services local shops and facilities.</p>
	Mr Paul Stroud	<p>Land south of BRE, Bucknalls Lane, Garston</p> <p>This site should be considered in addition to the BRE site to accommodate additional housing and provide a defensible boundary. It is in a location which has been deemed to be acceptable for residential development and would provide the flexibility in allocations which would be prudent. This larger location would enable the delivery of more affordable housing in a sustainable and effective manner.</p>
	Mr Curliss	<p>Promoting land to the west of the Harpenden Road bordering the Childwickbury Estate to the north and Sparrowswick Ride and the Townsend School to the south for residential development (c. 200 dwellings)</p>
	JB Planning Associates on behalf of Beechwood Homes Ltd.	<p>Promoting land at Verulam Golf Club, London Road, St Albans for residential development (c. 60 dwellings).</p>
	JB Planning Associates on behalf of Hilton House Properties Ltd	<p>Promoting land at Orchard Drive, How Wood for residential development (30 to 40 dwellings).</p>
	JB Planning Associates on behalf of Marchfield Developments Ltd	<p>Promoting land at Codicote Road, Wheathampstead for residential development (around 30 dwellings)</p>
	Rippon Development	<p>Promoting the BT Trial site, Smallford for housing development.</p>

	Services on behalf of BT plc and Telereal Services Ltd.	
	Drivers Jonas on behalf of Legal and General	Promoting The Sphere Industrial Estate, St Albans for residential development.
Other Comments	Maddox & Associates on behalf of Goodman (owner and developer of Hatfield Business Park)	There is little certainty over the deliverability of much of the proposed supply of housing. For example, the outcome of the public inquiry on the Oaklands College, Smallford and Highfield Campuses is still awaited.
	JB Planning Associates on behalf of Beechwood Homes Ltd.	<p>The Core Strategy should not include site specific detail which can date quickly. The Core Strategy should state the principles by which development land will be identified, and leave the identification of specific sites to more site-specific DPDs and Area Action Plans.</p> <p>None of the sites included in the Emerging Core Strategy are of sufficient importance to warrant being included as strategic sites, as none are central to the delivery of the strategy, as required by PPS12.</p>
	JB Planning Associates on behalf of Beechwood Homes Ltd.	The Emerging Core Strategy relies too heavily on a few large housing sites, and does not give sufficient weight to the sites identified through the SHLAA process.

Chapter 11 – Employment Policies (Q9/C1 – E1/AOS2, E2, E3, E4, E5/AOS7)

Issue:	Respondent:	Summary of response:
Employment Land Studies		
Job growth in existing built up areas		
Green Belt Employment sites	Barwood Land and Estates Ltd	Welcome para. 11.13 which notes "...that exceptional circumstances exist that justify the release of some limited Green Belt land for B1 office/business park development."
Proposed Strategic Employment Sites:	Barwood Land and Estates Ltd	It is not sustainable to focus future employment opportunities on one sector or in limited locations, as currently proposed with options (i) – (v) in the Emerging Core Strategy document.
<ul style="list-style-type: none"> E1 (AOS2 north east part) London Rd adjacent to cemetery 	Leach Homes	<p>Land at London Road – parcels A-D</p> <p>A masterplan has been produced which considers issues relating to transport, flooding, drainage, ecology, archaeology, and landscape.</p> <p>Two development options have been identified:</p> <p>Option 1 involves residential on parcel A for 550 homes; hotel, conference centre, pub/restaurant and 100 space park and ride in parcel B; low density residential development in parcel C; open space and landscaping in parcel D.</p> <p>Option 2 involves business park (40,000 sq m) in parcel A, hotel, conference centre, pub/restaurant and 100 space park and ride in parcel B; low density residential development in parcel C; open space and landscaping in parcel D.</p> <p>Key characteristics include: retain and enhance pedestrian and cycle links at Nightingale Lane; respect boundary shared with cemetery; retain and enhance public right of way at northern boundary; safeguard green approach into St Albans by providing vegetation along London Road; retain , enhance and provide new vegetation and wildlife habitats; create a high quality sustainable development.</p>
	Leach Homes	<p>Land at London Road & AOS 2</p> <p>Site E1 in AOS2 has been consistently proposed for residential or employment via a strategic release. This is an excellent housing site and better than AOS 1, 3 and 7.</p> <p>Its rejection on the matter of coalescence is not accepted.</p> <p>In support of the employment allocation there is a sustainable transport and Access Strategy and an employment update.</p> <p>This site is better than Roehyde and site E5 AOS7.</p>
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd,	Strongly oppose.

	Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
• E2 Rothamsted Research, Harpenden	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Potential expansion of the knowledge cluster at Rothamsted Research could ensure the District maintains opportunities for skilled workers to work in the District, reducing the likelihood of out commuting.
	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Support the proposed strategic employment site.
	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Agree that a high degree of sustainability will be integrated into development but object to use of the prescriptive "carbon neutral" in para.11.16.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd,	Tend to support.

	Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
• E3 BRE, Garston	Tetlow King Planning on behalf of London and Cambridge Properties	Consider that the BRE site would be better suited to employment purposes rather than housing. The BRE is a renowned centre of sustainable construction and would help to attract other businesses to the area.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	Tend to support.
Possible Additional Strategic Employment Sites	Barwood Land and Estates Ltd	There is a need to allocate office land at St Albans District to meet demand.
• E4 Roehyde	RMPL	Land at Roehyde – Land at northern end of the site. Seeking to promote the land for strategic waste management. ECS and the waste core strategy need due regard to each other. It is considered that waste management use is complementary to employment use. The co-location of uses would provide potential for energy recovery technology and provide combined heat and power as part of a sustainable energy strategy. Exceptional circumstances for green belt releases are identified for employment, similar considerations

		<p>relate to major waste management facilities.</p> <p>The proposed strategic waste facility would be high quality design, and all major processes would be internalised and subject to high environmental controls. This reduces the potential adverse effects associated with older waste facilities.</p> <p>This site is previously developed land next to the A414 and A1M. It is not in agricultural use, and does not contribute to nature conservation, or leisure and recreation purposes. It is a poor quality environment and contributes little to the landscape character and quality of green belt.</p> <p>The site is extremely well located for the strategic road network A414 and A1M. The site is in a sustainable location close to an urban area but proposed development would not affect existing residential communities. Close proximity to the university would provide a possible opportunity for energy recovery and CHP.</p> <p>Flooding is not an issue with appropriate water management arrangements, there are land stability issues, no known archaeological remains, no habitats of high nature conservation value, and is not an area of high quality landscape. Therefore there are no physical constraints on this site.</p> <p>Support release of site from green belt and its identification for employment. The potential for CHP, energy recovery and waste management development should be acknowledged.</p>
	Leach Homes	Strongly object to Roehyde site because legal challenge to EEP; Proposals for a garden centre and hotel nearby were refused due to highway reasons; the location is remote and not accessible; flooding in access subway to the south of the site; bus stop 300m away and bus services passing the site are infrequent; new junction not acceptable to highways authorities; in transport terms vastly inferior to site E1 at London Road.
	Moult Walker on behalf of The Roehyde Consortium	Strong support for the Roehyde Strategic Employment Site Proposal.
	The Roehyde Consortium	Strongly support.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd,	Strongly oppose.

	C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
• E5 (AOS7) extension to Porters Wood	Leach Homes	The existing Porters Wood site suffers by way of remoteness from main roads and is unlikely to attract major inward investment or large relocation.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	Strongly support. Employment growth should be concentrated around Porters Wood and based on improving access to this core employment site.
	Hallam Land Management	It is important that the continued success of Porters Wood is sustained throughout the Core Strategy period and Area of Search 7 will play an important role in ensuring that this is achieved both in the development of a mixed use sustainable urban extension which will complement the existing employment area and in facilitating a new and significantly improved access to Porters Wood.
Other Sites	Debenhams Ottaway Solicitors on behalf of Fir Trees Farm Ltd.	The use of the Noke Lane Business Centre, Chiswell Green would make a small contribution towards meeting the employment deficiency. Suggest that provision be made within the Core Strategy for the more efficient use of sites such as this, in this case for employment purposes.
	Entec on behalf of The Crown Estate	Whilst the regional policy relating to the need for urban extensions at Hemel Hempstead has been quashed, there is still a strong case for the regeneration of the Maylands Employment Area including linkages with the Maylands Gateway area.

		Employment development to the east of Hemel Hempstead will significantly benefit the residents of St Albans and provide an opportunity to improve bus routes between St Albans and Hemel Hempstead and reduce long distance commuting.
	Tribal on behalf of SEGRO plc	Land south-west of the Colney Street Industrial/Warehousing Estate. Previously the site of a public house partly destroyed by fire. Allocate as employment development, as an extension to the existing employment site.
Other Comments	Barwood Land and Estates Ltd	In the absence of almost any new land for employment, in particular quality offices, the sustainability of the new plan will be profoundly flawed, and the ambitions for an area of such high quality as St Albans will not be achieved. The site at Napsbury Lane (west of the railway line) should be referenced in the Core Strategy or a criteria-based policy which favours such sites.
	Entec on behalf of The Crown Estate	St Albans should be working jointly with Dacorum Borough Council on the East Hemel Hempstead Area Action Plan.
	Tribal on behalf of SEGRO plc	The stance taken by the Council in respect of B8 warehousing at paragraph 11.13 is in conflict with advice contained within Policy E2 of the East of England Plan which seeks to ensure an adequate range of sites/premises for the full range of employment sectors.
	Terence O'Rourke Ltd on behalf of London Luton Airport Operations Limited (LLAOL)	The existence and future growth of London Luton Airport should be recognised for economic and employment purposes. Potential to contribute to employment directly through aviation and logistics related businesses, and through businesses that benefit from access to international travel.
	Drivers Jonas on behalf of Legal and General	Support the allocation of the most suitable sites for employment. The Council should however recognise the potential of less suitable sites for other forms of development and in particular residential.
	CGMS on behalf of Helioslough	Regret the fact that at present, the Council does not support its proposal (Strategic Rail Freight Interchange) as stated in paras 11.15 and 13.9 of the document. An economic impact study forecasts that the scheme will create some 640 office jobs, which would contribute some 15% to the Council's target of a 4300 net increase in the period 2006-2026. The forecast generation of 2300 jobs at the SRFI in warehouse occupations has a potential significant role in offsetting the forecast net loss of 1900 industrial/warehouse jobs from the district during the period from 2006 – 2026.
	Countryside Properties (agent Molyneux Planning)	The loss of employment land for housing cannot be allowed to continue.

Chapter 12 – Shopping Policies

 (Q10/D1 – Harpenden and St Albans Centres) (Q11/D2 – SH1, SH2) (Q12/D3 – SH3, SH4)

Issue:	Respondent:	Summary of response:
Retail Hierarchy	Cerdea Planning on behalf of Antringham Verulamium	<p>St Albans City Centre is the highest order commercial core within the Council's administrative boundary. It is defined as a city centre and in accordance with the provisions of PPS6 is appropriate for a range of shops, services and facilities. In principle, support is offered for proposals for shopping, culture and related facilities. However, the specific uses to be allocated to any given site should be the subject of very careful analysis if the plan is to be sound.</p> <p>City Vision is not a statutory planning document and carries no weight in the decision making process.</p> <p>Any allocations, for example Civic Centre South, should reflect land ownership issues, viability and phasing.</p>
	Shire Consulting	Paragraph 12.22 states that the Core Strategy will include a policy statement regarding the need to protect the vitality and viability of centres. That is unnecessary as it would simply be repeating Government Policy set out in PPS6.
	Indigo Planning on behalf of Sainsbury's Supermarkets Ltd	The existing Sainsbury's store at Everard Close represents a logical and sustainable opportunity for delivering the retail floorspace identified for St Albans. A planning application is currently being prepared to extend the store to address existing overcrowding.
Importance of Market and the internet		
Comparison Goods floorspace:		
<ul style="list-style-type: none"> • SH1 west of St Peters St 		
<ul style="list-style-type: none"> • SH2 East of St Peters Street 		
<ul style="list-style-type: none"> • SH3 Griffiths Way 	Blue Sky Planning on behalf of Hermes Real Estate	<p>Supports the identification of the area on the Key Diagram as a "Possible Non Food Shopping" development site. Also supports the identification of the area in the tables on Page 52 and 84 as having "potential for more retail warehousing and development".</p> <p>Note that alternative sites in the City centre have not come forward for development, being constrained by land ownership, physical issues and financial viability.</p>
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr	Tend to support.

	Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr Schofield, Mr Eric Walton	
• SH4 Colney Fields	Indigo Planning on behalf of Sainsbury's Supermarkets Ltd	Additional retail floorspace at Colney Fields will help address the quantitative need for additional retail floorspace in the District. It is proposed to develop a new District Centre at Colney Fields.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice	Strongly oppose. An expansion of Colney Fields does nothing for retailing in the City Centre but rather draws trade away.

	Developments Ltd, Mr Schofield, Mr Eric Walton	
	Legal & General	<p>Colney Fields Retail Park</p> <p>Colney Fields provides a shopping facility for residents of London Colney and the wider district which reduces the need of residents to travel further afield L&G wish to maintain and enhance this location through the provision of additional floorspace for comparison goods at Ridgeview.</p> <p>St Albans city centre is strong, healthy and vibrant but lacks available sites which can accommodate a large retail floorspace. It is unlikely that any city centre sites will come forward in the foreseeable future and at best are long term opportunities.</p> <p>Ridgeview and the wider retail park can meet part of the demand for comparison floorspace that cannot be accommodated in the city centre.</p> <p>It is considered that this would not harm the vitality and viability of the town centre or prejudice the delivery of identified city centre sites.</p> <p>We strongly support the possible expansion of Colney Fields retail park. L&G are agreeable to the preparation of a masterplan.</p>
Convenience Goods Floorspace:	DPP on behalf of Tesco Stores Ltd.	<p>Consider it inappropriate to have policies relating to the specific preferred location for convenience retail development. It is usual for the core strategy to set out strategic sites and policies: non strategic, site specific allocations are more appropriately considered within the Site Allocations DPDs.</p> <p>There is a significant level of uncertainty over the possibility of accommodating convenience retail development within the City Centre.</p>
<ul style="list-style-type: none"> FS1 London Road / Alma Rd 	DPP on behalf of Tesco Stores Ltd.	<p>Object to the omission of the Eversheds Site as a potential location for Convenience Retail Development</p> <p>If the Council fails to allocate the Eversheds site for convenience retailing, but continues to allocate out of centre sites as alternatives for new foodstores (i.e. the FS2 and FS3 sites), then the policy would be totally unsound and challengeable, since no evidence has been presented to demonstrate the suitability of the out of centre sites.</p>
<ul style="list-style-type: none"> FS2 Harpenden Road Fire Station Site 		
<ul style="list-style-type: none"> FS3 (AOS7) north of St Albans 	Hallam Land Management	<p>Neither Drovers Way nor the Civic Centre area provide appropriate locations for food retail and as a result the Council will need to consider proposals for an out of town foodstore to meet the need which has been identified in the 2009 Retail Study. Of those sites identified FS3 forming part of Area of Search 7 provides a unique opportunity to address both the need identified in the north of St Albans as well as the need for new convenience floorspace in Harpenden.</p>
<ul style="list-style-type: none"> FS4 West of St Peters St 		
<ul style="list-style-type: none"> FS5 East of St Peter St 		

• FS6 Harpenden Town Centre		
• FS7 Southdown		
Out of centre sites:		
Shops and services elsewhere in the district		

Chapter 13 – Transport Policies (Q13/E1 – city centre traffic, bus, cycling and walking, park and ride, western orbital)

Issue:	Respondent:	Summary of response:
Transport plans		
Roads and traffic		
Western orbital route	Countryside Properties (agent Molyneux Planning)	AOS1 and western orbital route. Strongly support the western orbital route and believe that it will benefit the wider community in St Albans and County as a whole.
	Countryside Properties plc and CP Holdings	Continue to support St Albans District Council for the delivery of the western relief road.
	Strutt & Parker on behalf of the Gorhambury Estate	Object to the proposed Western orbital route due to the significant impact on the historic parkland at Gorhambury, on the setting of the remains of the Roman Theatre and Verulamium and on both the built and natural environment in the area of St Michaels. The proposals would detract significantly from these important and historic visitor attractions. It is the Estate's opinion that the expansion of the road usage in this area would increase the perceived division between the City and the recreational uses of the permissive paths at Gorhambury Estate and the visitor attraction of the Roman Theatre.
	DLA Town Planning on behalf of Mr Ansari, Mr Tony Berry, Mr Richard Black, Mrs Julie Bennett, Mr Stephen Bygrave, Mr Catton, Mr Collins, Mr Gingell, Mr Hutchinson, Hunston Properties Ltd, Mr Hewitt, Sir Martin Holderness, Mr David Jelley, Jarvis Group Ltd, Mr Loy, Mr Lewis, Mrs Lesslie, Legal Estates PLC, Mr Graeme Moore, Oakridge Homes Ltd, C.J. O'Shea Group Ltd, Mrs Pattison, Mr Roy Pinnock, Mr Ravenscroft, Peter Rice Developments Ltd, Mr	Strongly oppose. Road would cut through otherwise open countryside

	Schofield, Mr Eric Walton	
Improvements to Park St and London Colney Roundabout	CGMS on behalf of Helioslough	Support.
Eastern distributor route		
Network St Albans		
Public Transport		
Mini Park and Ride		
• PR1 London Rd		
• PR2 Land near Butterfly World		
• PR3 Park St Roundabout		
• PR4 A414 (former M10) junction with proposed Western Orbital Route	Countryside Properties (agent Molyneux Planning)	Without AOS1 and the western orbital route this P&R would be of little benefit to the wider community.
Walking and cycling		
Other transport comments	Cerda Planning on behalf of Antringham Verulamium	Proposal (i) seeking to reduce traffic and improve the facilities for bus, cycling and walking is considered to be a highly sustainable approach to St Albans City Centre, accords with national policy and can, therefore, be justified.
	Terence O'Rourke Ltd on behalf of London Luton Airport Operations Limited (LLAOL)	Disappointed to see that the reference to London Luton Airport and that the implications that it would have for development in the district has been removed. Consideration should be given by the local authority during the preparation of local development documents, (particularly those related to the allocation of specific sites for any type of development, especially residential), to existing and future flight paths. The Core Strategy or Development Policies DPD should deal with noise insulation associated with proposals for residential and other forms of development which are particularly sensitive to aircraft noise, in accordance with PPG24 <i>Noise</i> .
	CGMS on behalf of Helioslough	A Park Street and Frogmore bypass will remove HGVs and most other traffic from the environmentally sensitive area at Park Street and Frogmore. This will allow environmental improvements to be introduced along the A5183, including traffic management measures to prevent HGVs using this route. More emphasis should be placed on the contribution which increased use of more sustainable modes of transport for freight can contribute to reducing CO2 emissions.

		The section on transport plans should also note the fact that Network Rail has indicated (East Midlands Road Utilisation Strategy, consultation draft 2009) a need for a freight bypass loop to the south of Bedford.
--	--	---

Chapter 14 – Social and Community Facilities Policies (Q14/F1 – education) (Q16/G1 – youth facilities)

Issue:	Respondent:	Summary of response:
Education facilities		
<ul style="list-style-type: none"> New secondary school north of St Albans 		
<ul style="list-style-type: none"> New primary school west of St Albans city centre 	Countryside Properties plc and CP Holdings	Strongly support a new primary school west of St Albans City Centre. This can be accommodated on land within Area of Search 1.
<ul style="list-style-type: none"> Other education comments 	Vincent And Gorbong on behalf of Hertfordshire County Council (Property)	Detailed feasibility work is nearing completion which will show how a school might be accommodated on the Birklands site, off London Road, St Albans.
	DPP on behalf of Tesco Stores Ltd.	Fail to see why SADC have suggested the former Eversheds site (London Road/Alma Road, St Albans) as a possible location for a school when HCC are not in agreement with this.
Non Educational facilities		
<ul style="list-style-type: none"> Reprovision of Pioneer Youth Centre 		
<ul style="list-style-type: none"> Reprovision of Harpenden Youth Centre 	Smiths Gore on behalf of Action for Children	Harpenden Youth Centre could in principle be re-provided on AoS8 as part of a comprehensive development if it were released from the Green Belt in the period to 2021.
<ul style="list-style-type: none"> Other youth provision comments 		
Other Community Facilities	Scott Brownrigg Planning on behalf of Health Properties (Harpenden) Ltd	Land at Lye Lane, Chiswell Green should be included in the emerging spatial strategy for medical and mixed use including hotel use. Providing a nationally and regionally accessible medical and clinical research, development and treatment campus including ancillary uses for example hotel and residential care.
	Indigo Planning on behalf of Sainsbury's Supermarkets Ltd	Promoting the creation of Colney Fields into a new District Centre with new retail, commercial, leisure and a mix of community facilities.

Chapter 15 – Building Safer and Stronger Communities Policies

Issue:	Respondent:	Summary of response:
Community cohesion inclusion and safety	CGMS on behalf of Helioslough	Agree that the Council should seek to promote social inclusion through equality of opportunity and equality of access to jobs for the whole community. It is important that employment is provided with suitable transport links to ensure that it is accessible by securing appropriate Travel Plans in association with major development schemes.
Deprivation		

Chapter 16 – Leisure, Culture and Tourism Policies (Q16/G1 – new culture and entertainment and tourism) (Q17/G2 – hotels HT1, HT2, HT3)

Issue:	Respondent:	Summary of response:
Culture, museums and entertainment		
Sport and recreation	Burhill Golf & Leisure Ltd	Aldwickbury and Redbourn Golf Courses. Consider further sites where viable in the green belt to provide sports and recreation facilities.
	CGMS Consulting on behalf of The Oxylane Group	Seek the inclusion within the core strategy key diagram and associated leisure, culture and tourism policies as given in chapter 16, for the development of a new strategic sports and recreation facility at land in the vicinity of junction 21 of the M25 at Bricket Wood. Representations argue the need for such a facility and suggest policy changes to reflect this.
Tourism	RPS on behalf of Bowmans Leisure Ltd – the owners of Willows Farm Village	Request that the Willows Farm Village rural visitor attraction itself be recognised as a major attraction, and that the parcel of land between White Horse Lane and the main buildings of Willows Farm Village be included as a site-specific allocation to provide a policy context for the future development of Willows Farm Village.
Hotels	Brian Barber Associates on behalf of Mr Jaffa	Propose land adjacent to Harper Lane, Radlett as a potential hotel, business or housing site.
	Cerda Planning on behalf of Antringham Verulamium	A new budget hotel should be promoted within the city centre and one such appropriate location would be the Civic Centre South site as part of a mixed use proposal.
	Shire Consulting	Neither the document nor the evidence base provides justification for the statement in paragraph 16.21 “it is unlikely that a suitable urban site can be found”.
• HT1 St Albans city centre		
• HT2 London Rd (adjacent to cemetery)	51 Pegasus Ltd	Land at North Orbital Rd, Chiswell Green is preferable to HT2 for hotel and conference facility. See below.
• HT3 Roehyde	Moult Walker on behalf of The Roehyde Consortium	Strong support for the Roehyde hotel proposal.
	The Roehyde Consortium	Strongly support.
Other hotel comments	Burhill Golf & Leisure Ltd	Aldwickbury and Redbourn Golf Courses. Green belt sites should be considered for 4 star hotel and conference facilities particularly those that may include golf courses. As part of the strategy for tourism growth, the provision of Golf and Country clubs should be considered

		on sites near to or adjacent to existing settlements.
	Countryside Properties (agent Molyneux Planning)	The proposed hotel locations are opposed, until evidence is produced to support chosen locations. The western orbital route provides the potential for a new hotel next to AOS1.
	51 Pegasus Ltd	<p>Land at North Orbital Rd, Chiswell Green for Hilton Hotel Campus with mini P&R facility.</p> <p>This site is preferable to site HT2. The ECS recognises the need for a 4 star hotel with conference facilities may constitute exceptional circumstances. This site is deliverable and this high degree of certainty makes it preferable to HT2 because it has support of Hilton Hotel Group which means funding is likely to be achieved. Not aware of operator interest in HT2 and funding is difficult to secure in the current climate. Feasibility of a large conference centre requires business from large blue chip companies from a wide area. Close links to the motorway is essential and this site is closer to M1 & M25 than HT2.</p> <p>Proposed development of this site is better than HT2 because: this site is previously developed land which is well related is considerably less harmful than HT2; HT2 will result in loss of agricultural land and will affect adjoining residential properties and ambience of the cemetery; this site is equally well related to the city centre and with comparable access to local services; this site is close to tourist facilities of Butterfly World and Gardens Of The Rose; habitat survey and bat roost assessment has been carried out and mitigation, compensation and enhancement measures have been identified. Local residents and stakeholders have been consulted and are supportive, this proposal has also received wide and supportive press coverage.</p>

Chapter 17 – Built and Historic Environment Policies – (Q18/H1)

Issue:	Respondent:	Summary of response:
Built environment		
Historic environment	Cerde Planning on behalf of Antringham Verulamium	It is a current failing of the Council that character statements have not been undertaken for each and every conservation area within the district.
Design	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Support the Council's intention to secure high quality design.
	Cerde Planning on behalf of Antringham Verulamium	<p>Strong objections are raised in respect of the requirement for high quality design to be sought which respects local character. Support high quality design but development should respond to local character rather than respect it.</p> <p>Opportunities should be taken to promote innovative modern architecture which is an objective of the Core Strategy.</p>
	Shire Consulting	Greatest concern relates to the statement that “the Council will consider the possibility of protecting residential areas outside conservation areas by designating them as Areas of Defined Residential Character”. This approach is contrary to Government Policy set out in paragraph 38 of PPS1.

Chapter 18 – Green Infrastructure, Natural Environment and Countryside Policies (Q2/A2)

Issue:	Respondent:	Summary of response:
Green spaces and playing pitches	Cerda Planning on behalf of Antringham Verulamium	Improvements to urban open spaces such as Verulamium Park are important to meet the needs arising from increased population within St Albans city centre.
	St Albans Civic Society	It is important that no public open space must be built on to achieve new developments.
Green infrastructure		
Natural environment and the countryside		
Watling Chase Community Forest	CGMS on behalf of Helioslough	Enhancement to the Watling Chase Community Forest in the District is supported. However, paragraphs 2.10 and 9.2 make no assessment as to how these are to be funded and delivered, which is essential if the policy is to be meaningful. The Strategic Rail Freight Interchange development will make a contribution to the Community Forest objectives. In association with the SFRI, the Company proposes to bring forward countryside enhancement schemes for 247 hectares of land around the former Radlett Aerodrome site.
Heartwood Forest	Hallam Land Management	Support the Heartwood Forest project and anticipate that Area of Search 7 will be instrumental in providing strategically important pedestrian and cycle links from St Albans to the Heartwood Forest thereby significantly improving its accessibility and recreation potential for the residents of St Albans.
Other		

Chapter 19 – Infrastructure Delivery Policies

Issue:	Respondent:	Summary of response:
Hertfordshire Infrastructure and Investment Strategy		
District Council Approach		
Developer contributions	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Support the need for a clear approach to planning obligations to deliver certainty. It is essential that the approach has regard to development viability and should be reasonable in accordance with Circular 05/2005.

Chapter 20 – Emerging Spatial Strategy

Issue:	Respondent:	Summary of response:
Settlement Hierarchy	Barton Willmore on behalf of Newlyn Developments Ltd	The Core Strategy should recognise the role of 'large villages' in the District. Large villages, such as Chiswell Green, include important local services and function as key sustainable settlements.
	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Support the concentration of development in the most appropriate settlements.
	Debenhams Ottaway Solicitors on behalf of Alban Developments Ltd.	There is a danger of a situation occurring where the theory of a settlement hierarchy might assume greater importance than the physical characteristics of a piece of land. Believe that Chiswell Green should be seen as a suburb of St Albans rather than as a separate large village in its own right.
	Southern Planning Practice on behalf of The Primrose Property Trust	The broad policy approach should be amended to allow small-scale infilling <u>and redevelopment</u> that does not harm the character of the settlement. Colney Street should be added to the list of settlements.
	RPS on behalf of Bowmans Leisure Ltd – the owners of Willows Farm Village	Support the broad policy to concentrate development at St Albans, Harpenden and London Colney.
	JB Planning Associates on behalf of Beechwood Homes Ltd.	Support the proposed settlement hierarchy in its recognition that St Albans is the most sustainable settlement within the District and should be the focus of the greatest level of new development.
	JB Planning Associates on behalf of Hilton House Properties Ltd	Support the proposed settlement hierarchy in its recognition that development should be focused in and around the District's main settlements. Specifically support the recognition of How Wood as a village within the second tier of development locations.
	Rippon Development Services on behalf of BT plc and Telereal Services Ltd.	Disappointed to note that the Council has decided to reject Smallford as a settlement which should be expanded to meet the housing needs of the district in the period to 2031.
	JB Planning Associates on behalf of Marchfield Developments Ltd	Support the proposed settlement hierarchy in its recognition that development should be focused in and around the District's main settlements. Specifically support the recognition of Wheathampstead as a village within the second tier of development locations.
	Robinson-Escott	More emphasis should be given to locations within Green Belt settlements such as Colney Heath. Such locations present good opportunities for small infill housing developments that meet local needs.
St Albans City Centre		
St Albans - rest of city		

Harpenden		
London Colney	Indigo Planning on behalf of Sainsbury's Supermarkets Ltd	Support the acknowledgement that London Colney functions as a town and support its re-classification to a 'town' in the Council's spatial strategy for the District. To address the lack of a town centre in this new 'town', it is proposed to develop a new District Centre at the Colney Fields Retail Park.
	Smiths Gore on behalf of Action for Children	London Colney should not be re-classified as a town. It has no town centre and with a population of 8,000 is a large village.
Large Villages excluded from the green belt		
Other settlements in the green belt		
Green belt countryside	Shire Consulting	Essential that green belt anomalies are rectified in the Core Strategy.
	Southern Planning Practice on behalf of The Primrose Property Trust	Amend to allow limited infilling and redevelopment within the existing frontages of smaller settlements in the Green Belt.
Key diagram	Southern Planning Practice on behalf of The Primrose Property Trust	Remove the Watling Chase Community Forest designation from Colney Street (including Ventura Park) Show Ventura Park east of the A5183 and the residential development at Colney Street as a Green Belt settlement.

Chapter 21 – Implementation and Delivery

Issue:	Respondent:	Summary of response:
	Entec on behalf of The Crown Estate	Even if growth to the east of Hemel Hempstead was not re-introduced at the regional level, joint working with DBC should still be progressed, particularly as DBC has proposed relocating certain land uses between the edge of the town and the motorway.
	Shire Consulting	The LDF should not duplicate or repeat Government Policy and Guidance. No need for the Council to expend time and resources on SPD to cover “Development in the Green Belt” or “Residential extensions and replacement dwellings in the Green Belt”.
	Southern Planning Practice on behalf of The Primrose Property Trust	The Council should adopt a flexible approach to implementing the policy so that sites are not prevented from being developed because of too high an infrastructure charge.

Other Issues (Q19/I1)

Issue:	Respondent:	Summary of response:
East of England Plan	Entec on behalf of The Crown Estate	Consultation on the emerging Core Strategy is premature given that the outcome of the 'repair' of the Regional Plan is not yet known and that key elements of the evidence base including the draft Strategic Housing Market Assessment is not yet available to inform comments. Also the draft Strategic Housing Land Availability Assessment has only just been produced.
Appendix 8: Assessment of Potential Strategic Housing Sites	Barton Willmore on behalf of Newlyn Developments Ltd	West of Chiswell Green site is deliverable and developable. A concept masterplan has shown that the site would include significant areas of landscaping, retain hedgerows, and contribute to new social and community facilities. Developing the site for a retirement village would not create any additional need for school places. A retirement village will also have less of a transport impact.
Strategic Housing Land Availability Assessment (SHLAA)	Bidwells on behalf of Rothamsted Research and The Lawes Agricultural Trust	Contend that the Council should consider sites in more detail. Site 98 (apiary site at Hatching Green), which is reviewed in a favourable light is partly PDL and well screened from open countryside beyond. As such, it should be considered favourably in comparison to open Green Belt land within the same category within the SHLAA.
Style	Shire Consulting	Disappointed by the use on occasions of prejudicial colloquial terms to describe legitimate planning issues.
Strategic Rail Freight Interchange at the former Radlett Aerodrome	CGMS on behalf of Helioslough	A second public inquiry to determine the outcome of this proposal is due to take place shortly, and we consider that it would be beneficial to update the draft core strategy factual background text when the decision is known (also see employment and transport comments).