



1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Vincent and Gorbing on behalf of Hertfordshire County Council (Hertfordshire Property) (HCC) owners of the Land West of London Colney. There are some small parcels of the Site not in HCC ownership, namely South Farm Cottages and South Lodge. These are excluded from the parameter plans and masterplan. HCC also owns land to the west of the allocation and to the north of the Napsbury Park Estate.
- 1.2 This site has been considered for future development as far back as 2008 and was put forward as part of the withdrawn 2020-2036 Local Plan Publication Draft 2018, where it was also identified as a Broad Location. It has continued to be identified within the Regulation 18 and Regulation 19 consultations of the current St Albans City and District Local Plan (DLP) with some variations in terms of the suggested uses as a result of changing service needs and representations from the HCC Growth and Infrastructure Team.
- 1.3 HCC has undertaken a full suite of technical surveys and feasibility work to understand the site constraints, which has informed an evolving masterplan, details of which have been set out in our representations at the Regulation 18 and Regulation 19 stage.
- 1.4 Since the Regulation 19 representations submitted in October 2024, the design team has continued to work on and evolve the scheme, and HCC Property has recently undertaken pre-application engagement with St Albans District Council (SADC), which included a more detailed illustrative masterplan layout (see **Appendix 1**). Whilst the formal advice has not yet been issued, Officers confirmed at the meeting that the principle of development is accepted, including the proposed care home, and it is accepted that the primary school is no longer required. Further discussion is ongoing regarding the details of the off site highways sustainable transport mitigation, the extent of the red line, and the location of the open space provision. A number of comments were received regarding the detailed layout and design detail, which will form part of the Reserved Matters. HCC are also in receipt of a number of statutory consultees feedback sought by SADC as part of this process. The general discussion at the meeting and feedback from statutory consultees received so far is supportive of the principle and encouraging in terms of moving the proposals towards an outline planning application.

2.0 MAIN MODIFICATIONS

- 2.1 As noted above, representations were made on behalf of HCC Property at the Regulation 19 stage. These representations requested a number of amendments to the plan, which were not taken on board prior to the submission of the plan to PINS. It is however noted that draft Main Modifications (MMs) have been published by SADC on 29 September (ED85B), which do take on board some of the requested amendments.
- 2.2 The following table summarises the changes requested and notes where these have now been addressed by the draft MMs:

Requested Change at Reg 19 Stage	Response to Draft Main Modifications (29.09.25)
B6 Site Allocation	
Proposed Use: The indicative unit numbers for the site should be amended to reflect the indicative masterplan and to ensure the site achieves a density of 40dph as set out at Policy LG1.	This has not been updated. When the care home was removed from the allocation, the number of units identified was reduced from circa 400 to 324 between the Reg 18 and Reg 19 DLP. The MMs have re-introduced a 70-80 bed care home, therefore the overall unit numbers should reflect this, and provide a figure of circa 410 units reflecting the illustrative masterplan prepared.
Key development requirements: The allocation should allow for the provision of a 70+ bed care facility to reflect the need expressed by HCC Adult Care Services.	This has now been included.
Key development requirements: The allocation should allow for 10 special needs dwellings to reflect the need expressed by HCC Adult Care Services.	This has now been included.
Key development requirements (Point 4) - it is requested that either the word 'segregated' is removed when describing the proposed cycle access, or the words 'where possible' are added.	This has not been amended to date. HCC fully intend to deliver a scheme that is safe for and establishes priority for cyclists and pedestrians, however, there may be some areas outside of the site on route to London Colney, where segregated access may not be possible to achieve.
Allocated Site Boundary Plan: The Green Belt boundary should exclude the education land, including the area allocated for playing field.	This has not been amended to date. This request is consistent with the previous representations made by HCC Growth & Infrastructure Unit on behalf of Children's Services. See further comments below.

Proposals Map	
Green Belt Boundary: As above, the area of land identified for the delivery of the entire secondary school provision, including sports pitches should be removed from the Green Belt.	This has not been amended to date. The proposed built form would mean that this land no longer meets the tests of including land within the Green Belt, and the continued designation of the sports pitches as Green Belt would limit the extent that such facilities could serve a dual community / Sport England level of use. If it remains as currently shown, any minor extensions or alterations to the school buildings cannot be delivered without the need to demonstrate very special circumstances. Exceptional circumstances have already been demonstrated to justify the delivery of a secondary school at this location, therefore this land should be removed.
B6 Housing Allocation Boundary: The land to the south of the secondary school, previously earmarked for a primary school, should be removed from the Green Belt and included within the beige housing allocation designation.	This has not been amended to date. Whilst it is currently designated as Green Belt, once the secondary school is built, this piece of land will no longer perform against any of the principles of including land within the Green Belt and would not represent a strong and robust Green Belt boundary. Previously it was accepted by the Council that the site was suitable for built development in the form of a school. In order to make the most efficient use of the site, the land should continue to be considered acceptable for built development in the form of housing. The illustrative masterplan prepared shows this area at a lower density, reflecting the transitional function to the Green Belt, and also provides structural landscaping, allotments and SuDS features.
Significant Publicly Accessible Green Space (proposed): This should be removed from the area to the south of Bridleway 4.	This has not been amended to date. This land is not required to deliver a policy compliant scheme in terms of open space related to the scale of development proposed, and is not currently publicly accessible land.

	The land is currently occupied by Barley Mo Farm and Fir Tree Farm House. These farm buildings and associated land are occupied by tenant farmers who use the land for grazing horses. To make this land entirely accessible to the public would require removing the current occupiers, who maintain the land in keeping with its Green Belt status and deliver a required and economically viable operation. Should this situation change in the future, there is nothing to stop the land becoming more accessible to the public, but this is not required in order to make the B6 site allocation acceptable. It is also not a Key Requirement of Policy B6.
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- 2.3 It is noted that an additional Key Development Requirement has been added to the allocation to deliver a children's home to accommodate three children in care. HCC Property support this addition.
- 2.4 It is considered that all the requested amendments that have not so far been taken on board as part of the MM are necessary to ensure the soundness of the plan.
- 2.5 The remainder of this Statement addresses the specific questions raised by the Inspectors (document SADC/ED84) in respect of Matter 7 Residential Site Allocations (Policy B6 Land West of London Colney Q1 – Q7).

3.0 RESPONSES TO INSPECTORS' QUESTIONS ARISING REGARDING POLICY B6

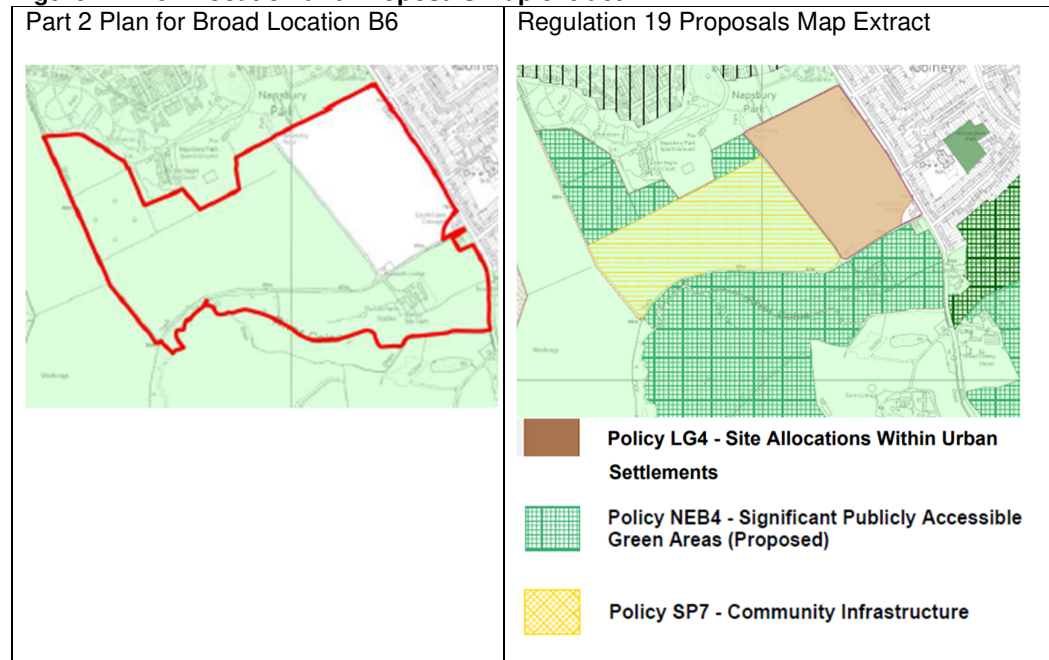
Issue 3 – London Colney Site Allocations

Policy B6 – West of London Colney

Q1. What is the site boundary based on and is it justified and effective? What is expected from the site area retained in the Green Belt?

- 3.1 The site boundary has been informed by the Stage 2 Green Belt Review, previous masterplanning work undertaken by HCC, and land ownership. The majority of the land within the allocation boundary is owned by HCC, therefore ensuring deliverability.
- 3.2 The area within the allocation currently proposed to be removed from the Green Belt correlates with the identified 250m buffer zone drawn around London Colney as part of the Stage 2 Green Belt Review. The part of the allocation identified for Green Belt release is intended to deliver the majority of the built development (the residential units including a care home). The western boundary of the land proposed to be released from the Green Belt is marked by a permissive footpath and existing hedgerow that would largely be retained as part of the development of the site.
- 3.3 Land to the west of this, within the allocation, but not currently intended for release from the Green Belt, is identified on the Proposals Map as Community Infrastructure, and is intended to accommodate the secondary school buildings and playing fields, reflecting previous and current masterplanning work. The southern boundary of this area is marked by a hedgerow and bridleway, the western boundary is similarly marked by a hedgerow with public footpath and track just beyond, and the northern boundary is marked by a mixture of hedgerows, shrub planting and woodland, all of which marks the edge of the Registered Park & Garden covering the Napsbury Estate.

Figure 1 – B6 Allocation and Proposals Map extract



- 3.4 Representations were made at the Regulation 19 Stage on behalf of HCC Property, and also by the HCC GIU at both the Reg 18 and Reg 19 stages, to request removal of the school land from the Green Belt as part of the allocation. This is based on the need to provide flexibility for the school to respond to changing teaching and community needs over time and not limit the community benefits that can be delivered. The proposed built form would mean that this land no longer meets the tests of including land within the Green Belt, and the continued designation of the sports pitches as Green Belt would limit the extent that such facilities could serve a dual community / Sport England level of use. If it remains as currently shown, any minor extensions or alterations to the school buildings cannot be delivered without the need to demonstrate very special circumstances. Exceptional circumstances have already been demonstrated to justify the delivery of a secondary school at this location, therefore this land should be removed.
- 3.5 It is considered that the new Green Belt boundaries that would be formed as a result of this change, represent the same physical boundaries as the Council sees fit to define the currently proposed Green Belt boundary (i.e. hedgerows and footpaths), and therefore would deliver a consistent approach. By extending the Green Belt boundary to the western edge of the proposed allocation, this would secure a long term boundary to the Green Belt, which would exist beyond the current plan period, in line with the requirements of para.147 of the NPPF. The use of the western third of the allocation for playing fields would maintain the open character, would provide a good transition between the built development and Green Belt boundary, and the playing fields would be protected in planning policy terms from development as long as that use persisted.
- 3.6 It is agreed that the land to the south of Bridleway 4 should remain in the Green Belt and provides a suitable and effective boundary.

Q2. How will the proposed secondary school be delivered, and what are the reasons for allocating land for the new school in this location?

- 3.7 Land for an 8FE secondary school has been identified as required at this Broad Location by HCC Children's Services (HCC CS) since the outset of the DLP consultation. Representations were made by HCC GIU on behalf of HCC CS at the Reg 18 and Reg 19 stages of the DLP supporting this allocation. The site is allocated for the purposes of a state funded school and will be delivered by HCC and their delivery partners.
- 3.8 There is currently no secondary school in London Colney, with the seven closest state secondary schools to London Colney all being in St Albans. The combination of the needs of the population generated by this development, coupled with the existing needs of residents at London Colney, has led to the identification of this site for delivery of a secondary school. With all secondary school age pupils currently having to travel outside of the settlement (mainly to St Albans) to access education, this provision will also deliver significant sustainability and transport improvements to the area. In terms of alternative sites within London Colney to deliver a secondary school, there are no brownfield sites suitable or available within the settlement boundary, and growth of the settlement is constrained by factors such as the A1081 dual carriageway to the east, a Nature Reserve and flood plain to the south, and existing leisure facilities to the north. Broad Location 6 represents the most sustainable location to deliver this facility.
- 3.9 The positioning of the school site within this overall Broad Location is based on the following factors:
- (1) the placement of the playing fields at the western edge of the site will provide an appropriate relationship to the Green Belt beyond, with the school playing pitches providing a gradual transition between the denser proposed residential development and the retained Green Belt beyond.

(2) the position of the play pitches also retained the open outlook from the grand West Hall within the Napsbury Park estate, which looks out over the Napsbury Park cricket pitch, and open fields beyond. The positioning of the school playing fields within the western half of the site thus maintains the original open aspect and agricultural setting from this important building within the Napsbury Park Estate Conservation Area.

(3) the positioning of the school ties in with the Policy Map, which designates this half of the allocation as being available for Community Infrastructure.

(4) the timing of the deliver of the school will depend on build out rates within the site itself.

Q3. What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

3.10 The wider justification for allocating land within the Green Belt, the exceptional circumstances for this, and the proposed alterations to the Green Belt boundary have been set out by SADC in their evidence including:

- Stage 2 Green Belt Report 2023 (**GB 02.02**)
- Green Belt and Exceptional Circumstances Paper (**GB 01.01**)
- Local Plan Site Selection Proforma Sheet (**LPSS 02.04**) and
- Composite List of Alterations to the Green Belt boundary (**SADC ED33** Initial Question 12 Final)

3.11 A large part of the site identified for development (the residential development) falls within the identified 250m buffer zone around London Colney for the purposes of assessing the appropriateness of Green Belt sites from possible release.

3.12 The SKM Stage 1 Green Belt Review identified the site within Area GB31, which covered a large area to the west of London Colney, up to the railway line and including land to the south of the M25 almost as far as Shenley. A parcel of land, directly south of the Napsbury Estate and wrapping round the south-west edge of London Colney was identified as a Strategic Sub-Area for further review.

3.13 The Stage 2 Green Belt Review (**GB 02.02**) broke down the Strategic Sub-Area into several sub-areas, with the subsequent allocation comprising all or part of SA-146, SA-147, and SA-148. Against the individual purposes, the sub-areas only scored strongly against Purpose 3 – safeguarding the countryside from encroachment, however, overall, the assessment concluded that all sub-areas referred performed strongly against the NPPF purposes.

3.14 Notwithstanding the conclusions of the Stage 2 Green Belt Review, the site was taken forward due to its location directly adjoining a Tier 3 settlement, and the potential of the site to deliver a range of economic, environmental and social benefits in the form of housing, affordable housing, specialist care, a secondary school and significant sustainable transport improvements. This approach follows that which is set out within the Green Belt and Exceptional Circumstances Paper (**GB 01.01**).

3.15 In considering the proposed new Green Belt boundary at this location in the context of para.148 of the NPPF, it is relevant to note our previous representations and answer to Q1 above.

- 3.16 Whilst recognising that the current proposed boundary meets the physical criteria for defining a Green Belt boundary (criterion (f)), the new boundary as shown does not necessarily align with criterion (e). By continuing to show the proposed school development within the Green Belt when it has been demonstrated that there are exceptional circumstances for delivering the school at this location, any planning application will still be required to demonstrate very special circumstances for the school proposals. This not only places uncertainty on the delivery of the school, but if the need for the school is accepted, and the principle of development at this location is accepted, then the school site should be taken out of the Green Belt, as it would no longer perform the criteria for including land within it. A much stronger, long lasting boundary, that extends beyond the current plan period, would be to draw the Green Belt boundary along the western limits of the allocation, where there is also a hedgerow, footpath and track, which would provide an appropriate physical boundary.
- 3.17 It has been set out above that by extending the Green Belt boundary to include all of the land required for the school, the proposed boundaries would be marked by readily recognisable physical features including hedgerows, footpaths and the boundary of the Napsbury Estate. These reflect the physical features currently considered appropriate by the Council to mark the current proposed amendment to the Green Belt boundary, and are consistent with Table 4.2 (page 27 (pdf pg30)) of the Stage 2 Green Belt Review (**GB 02.02**).

Q4 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 3.18 Answering this question refers back to the Council's position set out at document **GB 01.01**, which considers the exceptional circumstances that exist on a District wide level in allocating land within the Green Belt for the provision of housing, and in this case also a secondary school. The Council has undertaken an extensive and rigorous search for Previously Developed Land within existing built up areas and beyond. The tightly drawn Green Belt boundaries that form the settlement edge to all the urban areas within the District means that it is not possible for the Council to meet its housing need without the allocation of land within the Green Belt.
- 3.19 In considering exceptional circumstances, the acute need for housing alone is sufficient to demonstrate exceptional circumstances, and this reason is appropriate to apply in the allocation of this site. In addition to the delivery of housing, the proposals will also deliver older persons, supported living accommodation for different population groups, a secondary school (identified as being a significant need, not only to serve London Colney), and significant highways and sustainable transport improvements throughout London Colney.
- 3.20 For these reasons it is considered that exceptional circumstances exist as part of the wider growth strategy proposed as part of this DLP to justify amending the Green Belt boundary at this location.

Q5. Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 3.21 Significant pre-app engagement has already been undertaken with HCC Highways in developing the draft illustrative masterplan, including their contribution at the recent pre-app meeting led by SADC.

- 3.22 The design team has adopted a vision led approach to the transport strategy, considering active and sustainable travel modes in the first instance, and how these can be delivered appropriately through the site to achieve the most convenient, direct and attractive travel choices for residents, school users and all those who will visit the site. In preparing this vision led approach, HCC's South Central Growth and Transport Plan (SCGTP) and Local Cycling and Walking Infrastructure Plan (LCWIP) guidance have been used to develop an appropriate access strategy. Improvements to the local public transport network have also been considered and built into the overall strategy to reduce car dependency.
- 3.23 Following development of a sustainable transport strategy which prioritises walking, cycling and use of public transport, consideration has been given to how the road network could work with this, and not just accommodating peak hour vehicle demand. As such, junctions and road layouts have been designed to put other users first, prioritising safe pedestrian crossing; cycle traffic; and bus use. The main vehicular access into the site has been revised from the earlier roundabout iterations following engagement with the Highways Authority. This will now be a traffic light controlled junction, with dedicated pedestrian and cycle crossing phases. The traffic control system will also be able to react to real time traffic information, responding to fluctuating demand patterns throughout the day. HCC Highways has confirmed that the general approach to access is supported.
- 3.24 In the work undertaken so far to develop a masterplan for the site, the guidance set out within the Place Movement Planning and Design Guide (PMPDG) and LCWIP has been applied, and general design requirements have been noted to ensure a safe road network.
- 3.25 Key development requirements 3, 4, 5 and 6 of Policy B6 set out the access requirements for the site allocation, and clearly reference the LCWIP and SCGTPs, to ensure delivery of sustainable travel improvements within the London Colney area. The level of contribution and works will be commensurate with the scale and impact of the development, and this will be determined in accordance with planning obligations guidance and regulations.
- 3.26 The landowner and applicant, working with their design team and HCC Highways, are satisfied that the policy is clear in setting out what is required and are confident that the ambitions in relation to access and sustainable transport within the site and the wider London Colney area can be achieved through continuing discussions with HCC Highways.
- Q6. How has the effect of development on the setting of the designated heritage assets been considered, having particular regard to the Napsbury Hospital Registered Park and Garden, the Napsbury Park Conservation Area and the All-Saints Pastoral Centre?**
- 3.27 The preparing of the illustrative masterplan has been informed by the following assessments:
- Heritage Assessment (2025) prepared by Orion (commissioned by HCC)
 - Desk-Based Archaeological Assessment (2025) prepared by Orion (commissioned by HCC)
 - Heritage Impact Assessment for B6 West of London Colney, May 2024 prepared by Place Services (commissioned by SADC) (**EDH 04.04**)
 - Place Services response to the pre-app request (dated September 2025)
- 3.28 In relation to listed buildings, there are none within the site, and those surrounding have no intervisibility such that would harm their significance.

- 3.29 In relation to the Registered Park and Garden, the design evolution of the proposals to date have been mindful of this designation, and HCC are confident that the proposals will not impact negatively on the special character and appearance of the Registered Park and Garden as a whole, although there will be a level of less than substantial harm to the significance through the change within its setting to the south, which is accepted by all parties. It is however considered that the level of harm can be reduced through considered design, retention of the central vista, and use of high quality materials.
- 3.30 There are a number of locally listed heritage assets both within Napsbury Park and to the south of the site. Four of these within the Napsbury Park estate have been identified as being sensitive to change (1-9 The Birches, 1-37 West Hall, 1-12 Wilde Court and 1-12 Acorn Court). These all benefit from some level of view towards the site allocation, however these views are screened or filtered by trees and shrubs within the Napsbury Parks. It is concluded that there will be a change to the wider setting of these locally listed assets, however, due to mature trees and vegetation, The Birches is best appreciated from within the former hospital grounds. The retention of open space across the western section of the allocation, will enable views southwards from the three other locally listed assets to remain, therefore the change to their wider setting is considered to be low-medium level.
- 3.31 In relation to non-designated assets (Barley Mo Farm and South Lodge), these are considered of low heritage value, neither of which lie within the application site. The immediate setting of Barley Mo Farm will not be affected by the proposals and the functional association of the building with its surrounding farmland is maintained. Whilst the setting of South Lodge will change, the significance of this building lies within its association with the former hospital, which is no longer present. The preservation of the track to Shenley Lane and the footpath north will maintain these historic links.
- 3.32 In considering the below ground archaeological assets, whilst there is the possibility of assets being present, the protection of these will be best served by undertaking a geo-physical survey to inform any further intrusive survey work. The desk-based assessment so far undertaken recommends that this is the best course of action and will inform the further development of the scheme.
- 3.33 In preparing the masterplan, it is recognised that the site contributes to the rural setting of the Registered Park and Garden and the Napsbury Park Conservation Area (NPCA). In order to maintain this setting as much as possible some key design principles have been applied. Firstly, the original driveway from South Lodge leading north to the Napsbury Estate has been retained and enhanced through the preservation of the existing hedgerow and the creation of a landscaped pedestrian route along its length. Secondly, it is considered that the care home and school buildings are read within the context of Napsbury Park, reflecting the more functional, larger footprint buildings found within the Napsbury Park complex but set within generous landscaped plots. The location of the attenuation basin with surrounding park green space has also been placed adjacent to the Napsbury Park complex, to preserve the immediate open setting. Finally, formal and informal green space has been woven through the proposed layout with small perimeter blocks reflecting the arrangement of the original and additional development within the Napsbury Park estate.
- 3.34 The layout strives to balance the need to make efficient use of the site, with its edge of settlement location and proximity to the heritage assets to the north. Whilst the detailed design has not fully evolved at this stage, it is intended that the NPCA Character Statement should be used as a reference to establish some local design principles to be carried through into the development site, as a further reference and respect of the heritage assets to the north.

- 3.35 The heritage assessment considered the proposed masterplan against the various heritage assets that have been identified within proximity to the site. In relation to the Napsbury Park Conservation Area it concludes that the proposals are unlikely to negatively impact on the special character and appearance of the Conservation Area as a whole, which principally relates to the historic built form and landscaping within it. It is considered that the proposals would generate a level of less than substantial harm to the significance of the designation through a change within its setting. However, taking account of the Conservation Area Appraisal, and with careful design, the retention of the central vista, and the use of a high quality palette of materials, these factors will aid in reducing this harm to a lower level.
- 3.36 Feedback from the SADC Design and Conservation Officer following the pre-app engagement concluded that while the proposal would change the setting of the southern part of the conservation area, this would have a minor impact on the overall significance in terms of its historic and architectural interest, and any resultant harm would likely be in the lower part of the less than substantial scale. It was also noted that the provision of a recreational use in the western part of the site would have an acceptable impact to the setting of the conservation area. The feedback advised that any development of the site should respect the design principles and material palette of the development in the conservation area.
- 3.37 It is considered that the proposals have been carefully developed to preserve and enhance the setting of both the Registered Park and Garden and the Napsbury Park Conservation Area, and whilst some harm (less than substantial) will result from the development of the site, the planning application will be considered against the requirements of para.215 of the 2024 NPPF, which requires any harm to be weighed against the public benefits of the scheme. These benefits will include:
- the delivery of significant new homes to support the growth strategy of the Local Plan
 - the delivery of affordable housing in excess of the Local Plan target but reflecting the transitional arrangements required as part of the 2024 NPPF (para.157), where a 15% uplift on Local Plan affordable housing requirements is applied to satisfy the Golden Rules.
 - The provision of land to deliver a new Secondary School in line with County Council identified educational needs
 - Delivery of a 70+ care home facility and 10 supported living units
 - Delivery of in excess of 10% BNG, significant public open space and SuDS
 - Delivery of active travel infrastructure both on and off site
- 3.38 It is considered that this range of benefits meet the tests of para.215 in outweighing any harm to the identified heritage assets.
- Q7 Is Policy B6 justified, effective and consistent with the national planning policy? If not, what modifications are required to make the Plan sound?**
- 3.39 It is considered that if the additional amendments sought are adopted as part of the Main Modifications, then Policy B6 is justified, effective and consistent with national planning policy.

APPENDIX 1



Figure 66- Proposed illustrative masterplan - Close Up

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