

Matter 7 – Residential Site Allocations

Issue 10 – Colney Heath and Radlett Site Allocations

Policy M13 – North of Boissy Close, Colney Heath

Q1 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 1.2 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024) which sets out in paragraph 7.2 that:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- *The acuteness/intensity of the housing need.*
- *The inherent constraints on supply/availability of non-Green Belt land.*
- *The difficulties of delivering sustainable development without impinging on the Green Belt.*
- *The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*
- *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

- 1.3 The evidence paper goes on to say in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land.

- 1.4 In relation to the specific case in this location, North of Boissy Close, Colney Heath, AL4 0UE, the specific localised Green Belt impacts are well understood because of the findings GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 on pages 436 to 438, relating to sub-area 93, states:

Purpose Assessment
Summary

The sub-area performs moderately against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs weakly against purpose 1 criteria (b). It does not meet purposes 2 or 4, and performs moderately against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area does not play an important role with respect to the strategic land parcel and if released in isolation, is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs moderately against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-38 (including a small strip of Green Belt land to the north of the sub-area).

- 1.5 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out on pages 5 to 6 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

The site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site is recommended to progress.

- 1.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location
- 1.7 N.B. Planning permission for 40 dwellings was granted on 17/06/2024 (outline permission reference 5/2022/2557) and it is proposed to update the allocation capacity accordingly as set out in SADC/ED85B and SADC/ED85C.

Q2 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?

Can a safe and suitable access to the site be achieved?

- 2.1 Yes, it is considered that a safe and suitable to the site can be achieved.

- 2.2 A Transport Impact Assessment (TIA) was completed for the site which informed the Local Plan by considering the impacts of developing the site in transport terms, and what mitigations (if any) are required. This included whether sustainable transport modes can be taken up, given the type of development and its location; whether safe and suitable access to the site can be achieved for all users; and whether any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 2.3 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents in regards to a safe and suitable access.
- 2.4 The TIA for the site in INF 09.02 - Transport Impact Assessment Appendix 1 2024 Colney Heath (2024) includes:

3. Access Strategy

The site has direct access onto Boissy Close. Details of access via the narrow Boissy Close must be agreed with the County Council. Access to the Alban Way adjacent to the northern boundary must be provided. A Local Transport Plan (LTP) compliant access strategy allowing safe access for all modes is deliverable.

...

Conclusion

...

An LTP compliant access strategy allowing safe access for all modes is deliverable. The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety. Overall there are 'no showstoppers'.

Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 2.5 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents. HCC also agreed what would comprise the necessary highway improvements and where and how they would be delivered. As set out in SADC/ED85B and SADC/ED85C this includes HCCs agreement to some small scale Main Modifications to the highways and public rights of way requirements.
- 2.6 The necessary highway improvements are made clear to users of the Plan in the key development requirements of the site allocation which are set out in LPCD 02.02 – Reg 19 Local Plan Part B (2024) and further amended for clarity in Main Modifications in SADC/ED85B and SADC/ED85C and state:

Key development requirements

1. *Proposals must include support for improvements via delivery or contributions to the local Rights of Way network, including access to the Alban Way adjacent to the northern boundary.*
2. *Details of access via the narrow Boissy Close must be agreed with the County Council.*
3. *Delivery of / Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. Including but not limited to improvements to lighting / surfacing and access to the Alban Way (as per the South Central GTP), as well as improvements to Colney Heath Lane as per the LCWIP.*

- 2.7 Overall, the key development requirements alongside policies including LG4 – Large, Medium and Small Sites and SP14 – Delivery of Infrastructure are considered sufficiently clear about where and how they would be delivered.
- 2.8 N.B. Planning permission for 40 dwellings was granted on 17/06/2024 (outline permission reference 5/2022/2557).

Q3 Is Policy M13 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 3.1 Yes, it is considered that Policy M13 is justified, effective and consistent with national planning policy
- 3.2 As answered above in Policy M13 M7I10Q1, Policy M13 is considered to be justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 3.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M13 M7I10Q1 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 3.4 As set out in Policy M13 M7I10Q1 above, the Site Selection process set out in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) assessed site M13 for potential allocation in the Plan and recommended the site to progress.
- 3.5 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Site ref C-012) on pages 5 to 6 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) and as set out in Policy M13 M7I10Q1.

- 3.6 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site M13 for allocation, which states at paragraph 5.4.37:

5.4.37

....

• *Boissy Close (49 homes) – was granted planning permission subject to S106 in August 2023.*

- 3.7 Policy M13 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:

- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
- SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
- SADC/ED23 - Statement of Common Ground between SADC and Historic England
- SADC/ED24 - Statement of Common Ground between SADC and Natural England

- 3.8 Policy M13 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01 the Sustainability Appraisal.

- 3.9 Overall, Policy M13 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.

- 3.10 N.B. Policy M13 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy P1 – Smallford Works, Colney Heath

Q1 What is the existing use of the site and is it developable within the plan period?

- 1.1 The site has been removed from the draft Plan as the landowner has confirmed that the site is not available. There have been a previous application and appeal for residential use on the site (the residential planning application and appeal were refused essentially on grounds of overdevelopment, which was capable of being overcome) and it is possible that residential development will still come forward during the Plan period. However, given the landowner's stance, it is considered on

balance that it doesn't meet the NPPF test of deliverable and has therefore been removed. This is set out in the proposed Main Modifications at SADC/ED85B and SADC/ED85C.

Q2 What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?

What is the justification for not seeking to amend the Green Belt boundary in this location?

2.1 N/A

Q3 Is Policy P1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

3.1 N/A

Policy B8 Harper Lane, Radlett

Q1 What is the existing use of the site and is it developable within the plan period?

What is the existing use of the site

1.1 The site is predominantly Previously Developed Land and comprises Racing Stables, workshops, warehouses and open yards used for storage. There is a long and established planning history to this site with a number of permissions and Certificates of Lawfulness.

is it developable within the plan period?

1.2 Yes, it is considered to be developable within the plan period. As has been re-confirmed in summer 2025 by the landowner's agent, the commercial agreements are all short-term lettings, outside the security of tenure protection under the Landlord and Tenant Act. There has been considerable technical work undertaken (including a Noise Assessment and a Highways Assessment) and an indicative Masterplan prepared. There have been pre-application discussions with SADC.

1.3 The site is considered to meet the test of "developable" as set out in the NPPF in Annex 2: Glossary

...

Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

- 1.4 The site is set out as being “developable” site and is anticipated to come forward in years 2032/33-2037/38 of the Plan (6-11 years post-adoption), taking a relatively cautious approach (as set out in Matter 2 Issue 1 Question 1 Appendix 1 – Updated Housing Trajectory Addendum).

Q2 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?

What is the justification for the proposed alteration to the Green Belt boundary?

- 2.1 The primary justification is the need to deliver the housing requirements set out in the Plan, which is seeking to meet the ‘Standard Method’ for housing in full. There is also the need to deliver a range of other associated infrastructure and community facilities.

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?

- 2.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 2.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3.

- 2.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 152, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundary is readily recognisable and likely to be permanent. The outer boundary to the west is also readily recognisable and likely to be permanent, however the remaining outer boundaries are recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundary would not meet the NPPF definition. The new boundary would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs moderately against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration either in isolation as RA-48 or in combination with SA-153 as RC-11.

- 2.5 Also for this site, potential Green Belt boundaries were considered in GB 02.03 relating to sub-area 153, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundary is readily recognisable and likely to be permanent. The outer boundaries are readily recognisable but not likely to be permanent. If the sub-area was released, the new inner Green Belt boundary would not meet the NPPF definition. The new boundary would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area does not meet the NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in combination with SA-152 as RC-11.

- 2.6 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – Harper Lane (B556)

Eastern boundary – Unclassified private road

Western boundary – Thameslink railway line

- 2.7 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 3.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 3.2 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024) which sets out in paragraph 7.2 that:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- The acuteness/intensity of the housing need.*
- The inherent constraints on supply/availability of non-Green Belt land.*
- The difficulties of delivering sustainable development without impinging on the Green Belt.*
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*
- The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

- 3.3 The evidence paper goes on to say in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land.

- 3.4 In relation to the specific case in this location, Harper Lane, north of Radlett, WD7 7HU, the specific localised Green Belt impacts are well understood because of the findings GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 on pages 674 to 676, relating to sub-area 152, states:

Purpose Assessment

Summary

The sub-area performs moderately against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or 4, performs weakly against purposes 2, and performs moderately against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area does not play an important role with respect to the strategic land parcel and if released in isolation or in combination with SA-153, it is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs moderately against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration either in isolation as RA-48 or in combination with SA-153 as RC-11.

- 3.5 GB 02.03 on pages 678 to 680, relating to sub-area 153, states:

Purpose Assessment

Summary

The sub-area does not meet any of the purposes.

Wider Green Belt Impacts

Summary

Overall, it is judged that the sub-area does not play an important role with respect to the strategic land parcel and if released in combination with SA-152, is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area does not meet the NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in combination with SA-152 as RC-11.

- 3.6 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out on pages 34 to 35 in LPSS 02.04 Green Belt Sites Recommended Broad Location Proformas (2024). This is set out in particular in the Qualitative Assessment:

Part of the site is recommended for further consideration by the Green Belt Review Stage 2 report.

...

This site adjoins Radlett which is a higher tier settlement. It offers a wide range of significant Economic, Environmental and Social benefits including, a significant scale of sustainable transport improvements and jobs.

This site is recommended to progress.

- 3.7 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q4 How has the location of development been considered as part of the site allocation process, having particular regard to proximity of the railway line and existing commercial uses?

- 4.1 The location of development has been carefully considered as part of the site allocation process, having particular regard to proximity of the railway line and existing commercial uses. This is in part reflected in Key Development Requirements at:

6. In accordance with adopted Minerals Local Plan Policy 10: Railheads and Wharves, the safeguarded Harper Lane Rail Depot must be considered in the design to ensure the operation of the depot is not jeopardised and that no unreasonable restrictions will be placed upon it. The Minerals Planning Authority must be involved in Masterplanning work and will be directly consulted on any planning applications at the site.

- 4.2 SADC held meetings with the landowners agent, Tarmac (who own the Harper Lane Rail Depot) and HCC (as Minerals and Waste Authority) in order to address the concerns that Tarmac raised at draft Local Plan Regulation 18 stage. Those concerns are considered to have been wholly addressed.
- 4.3 An Acoustic Appraisal was undertaken in 2024 by consultants on behalf of the landowner to address concerns raised on behalf of Tarmac at the draft Local Plan Regulation 18 stage and to address noise from the adjacent railway line. The summary of findings were that there were no showstoppers to residential development and that external and internal noise levels can be appropriately mitigated. That Acoustic Appraisal concluded:

Conclusions

Transportation and industrial/commercial noise emissions have been calculated across the site allocation using a combination of measured noise survey data and computer noise modelling predictions. The assessment indicates that acceptable internal noise levels can be achieved in all dwellings across the development using either standard façade constructions (i.e. thermal double glazing and 'hit & miss' trickle ventilators) or acoustically upgraded glazing and ventilators. This can be investigated further as the masterplan develops.

The assessment indicates external noise levels in external amenity spaces (i.e. private gardens) are likely to exceed recommended values (particularly in the northern part of the site allocation) without mitigation. Consequently, it is recommended that careful consideration is given to garden layouts in the northern part of the site allocation. Ideally, these should be located behind buildings to

maximise screening as far as practicable. Boundary treatments (i.e. close boarded timber fencing) could also be incorporated to minimise garden noise levels as far as practicable. This can be investigated further as the masterplan develops.

In view of the above, there is no noise-related reason why residential accommodation cannot be provided at the site allocation.

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?

Can a safe and suitable access to the site be achieved?

- 5.1 Yes, it is considered that a safe and suitable to the site can be achieved.
- 5.2 A Transport Impact Assessment (TIA) was completed for the site which informed the Local Plan by considering the impacts of developing the site in transport terms, and what mitigations (if any) are required. This included whether sustainable transport modes can be taken up, given the type of development and its location; whether safe and suitable access to the site can be achieved for all users; and whether any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 5.3 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents in regards to a safe and suitable access.
- 5.4 The TIA for the site in INF 09.08 – Transport Impact Assessment Appendix 1 St Stephen (2024) includes:

3. Access Strategy

The site has direct access onto Harper Lane. Access to Harper Lane must be agreed with the County Council. Improved footpath and cycle routes must be provided into Radlett at locations agreed with the Council and pedestrian access to bus routes on both sides of Watling Street must also be provided. There is a reasonable prospect that a Local Transport Plan (LTP) compliant access strategy allowing safe access for all modes is deliverable. ...

Conclusion

...

There is a reasonable prospect that an LTP compliant access strategy allowing safe access for all modes is deliverable. The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety. Overall there are 'no showstoppers'.

- 5.5 It can additionally be noted that a Transport Assessment was undertaken in 2024 by consultants on behalf of the landowner to address transport matters. The summary is that an access and sustainable transport modes can be achieved within the adopted public highway and that these works would have wider community benefits beyond those for occupiers of a development.

Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 5.6 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents. HCC also agreed what would comprise the necessary highway improvements and where and how they would be delivered. As set out in SADC/ED85B and SADC/ED85C this includes HCCs agreement to some small scale Main Modifications to the highways and public rights of way requirements.
- 5.7 The necessary highway improvements are made clear to users of the Plan in the key development requirements of the site allocation which are set out in LPCD 02.02 – Reg 19 Local Plan Part B (2024) and further amended for clarity in Main Modifications in SADC/ED85B and SADC/ED85C and state:

Key development requirements

...

- 1. Support for improved footpath and cycle routes which must be provided into Radlett at locations agreed with St Albans City and District Council, the County Council and Hertsmere Borough Council. Pedestrian access to bus routes on both sides of Watling Street must also be provided.*
- 2. High levels of permeability between the site and the settlement of Radlett will be needed, this would include measures such as fully lit and hard surfaced walking and cycling routes from the site into Radlett and through to the services and facilities within the settlement. The railway acts as a barrier to movement from this site. Improvements via delivery or contributions of active travel routes and access to bus stops on Watling St are key to maximising sustainability of this site.*
- 3. Improvements via delivery or contributions of enhancements of the junction of the B556 and A5183 will require attention due to capacity and constraints.*
- 4. Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.*

- 5.9 Overall, the key development requirements alongside policies including LG1 – Broad Locations, SP14 – Delivery of Infrastructure and IMP1 – Additional Infrastructure Requirements for Strategic Scale Development are considered sufficiently clear about where and how they would be delivered.

Q6 Is Policy B8 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 6.1 Yes, it is considered that Policy B8 is justified, effective and consistent with national planning policy.
- 6.2 As answered above in Policy B8 M7I10Q3, Policy B8 is considered to be justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 6.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy B8 M7I10Q3 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 6.4 Site boundaries are addressed at question 2 above and Green Belt boundaries are addressed at question 3 above.
- 6.5 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across a proforma assessment (Site ref C-234) on pages 33 to 35 in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) and as set out in Policy B8 M7I10Q2.
- 6.6 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site B8 for allocation, which states at paragraph 5.4.145 to 5.4.149 and 5.4.152:

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

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

5.4.147 A key constraint is the single carriageway railway bridge along Harper Lane, with the bridge in question located adjacent to the site and on the route to Radlett

and St Albans. In this regard it is important to recognise that traffic from new homes would be to some extent balanced by reduced traffic from the industrial estate, but not entirely as there would be a need to retain the protected railway depot.

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

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

5.4.149 Another factor is that St Albans-bound journeys would be via the A5183, which passes through the Frogmore Conservation Area. However, the Government permitted SRFI is set to deliver a bypass.

5.4.152 In conclusion, the proposed allocation from the Draft Plan stage warrants ongoing scrutiny, despite having clear merit in terms of: A) recommended by the Green Belt Review; B) able to deliver a (modest) strategic scale scheme; and C) including a significant element of previously developed land (albeit in employment use). However, the primary issue here is road capacity, which is a technical issue for consideration by specialists, including from a viability perspective (noting the existing use value), such that there would be relatively little to be gained from exploring the possibility of allocation as a variable across the RA growth scenarios. As such, this sub-area is progressed to Section 5.5 as a constant.

6.7 Policy B8 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:

- SADC/ED17 - Statement of Common Ground between SADC and The Ivory Family
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
- SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
- SADC/ED23 - Statement of Common Ground between SADC and Historic England

- SADC/ED24 - Statement of Common Ground between SADC and Natural England

- 6.8 Policy B8 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01 the Sustainability Appraisal.
- 6.9 Overall, Policy B8 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 6.10 N.B. Policy B8 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.