

Matter 7 – Residential Site Allocations

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?

What is the site boundary based on and is it justified and effective?

- 1.1 The site boundary of Policy B6 includes land proposed to be retained within the Green Belt; roughly 15ha of the site is proposed to be removed from the Green Belt and roughly 35ha retained in the Green Belt.
- 1.2 The boundary of the site area proposed to be removed from the Green Belt is primarily based on physical features that are readily recognisable and likely to be permanent as long term defensible Green Belt boundaries. These were defined in the Green Belt Review and they are considered to be justified and effective. More details on the approach to defining the Green Belt boundary is set out in answer to Q3 below.
- 1.3 The site was not recommended for further consideration by the Green Belt Review Report (2023) (GB 02.02), however the boundaries as set out are considered to justified and effective and conform to the requirements of NPPF paragraph 148 which states that:
- 1.4 The primary justification for the area proposed to be removed from the Green Belt 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.
- 1.5 Relevant considerations are also set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024). Pages 53 and 54 set out:

West of London Colney

Site Location: The site is located on the western edge of London Colney. The existing settlement of Napsbury Park abuts the northern site boundary, with residential housing and schools to the east. The western and southern boundaries of the area to be removed from the Green Belt are defined by an access track that runs between Shenley Lane and Napsbury Park.

...

Settlement Form + Edge Character:

- *Low density and high-quality landscape edge of Napsbury Park to the north, in contrast to high density almost grid like settlement pattern to the east – interface between the two.*

- *River Colne corridor to the south. Open North Drive along eastern edge...*

- 1.6 The need for the site boundary for the area proposed to be removed from the Green Belt at B6, despite not being recommended for further consideration by the Green Belt Review Report (2023) (GB 02.02) (in more detail at GB 02.03 - Green Belt Review Annex Proforma Report (2023)), is justified with regard to the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024). Paragraph 7.2 states:

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.*

- 1.7 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. In relation to the area proposed to be removed from the Green Belt, the site selection outcome is set out across the proforma assessment for Site Ref M-010 on pages 27-29 of LPSS 02.04 Green Belt Sites Recommended Broad Location Proformas (2024). This is set out in particular in the Qualitative Assessment:

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site adjoins London Colney which is a Tier 3 settlement. It offers a wide range of significant Economic, Environmental and Social benefits including: housing, affordable housing, a secondary school, a significant scale of sustainable transport improvements and jobs.

This site is recommended to progress.

- 1.8 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.
- 1.9 The site boundary for Policy B6 is also in part justified by the landownership of HCC Property who have been actively promoting the site and positively responding to the Local Plan allocation at Regulation 18 and 19 stages. That part of the site proposed to be removed from the Green Belt is currently undergoing a pre-application process.

- 1.10 Overall, the site boundary for Policy B6 is considered to be justified and effective.

What is expected from the site area retained in the Green Belt?

- 1.11 The land in the western and southern parts of B6, beyond the proposed amended Green Belt boundary, are proposed for an 8FE secondary school site and for a number of proposed Significant Publicly Accessible Green Areas (SPAGAs) as set out further below which were put forward by landowners HCC for inclusion in the draft Plan at Regulation 18 stage. They were also included in the HELAA call for sites submission 2021, set out on pages 29-54 of HELAA 11.02 - London Colney Parish Part 2 (2021) and pages 1-5 of HELAA 11.03 - London Colney Parish Part 3 (2021).
- 1.12 The requirement for the school site is set out in the Key Development requirement for B6 at point 1:

1. A site for, and appropriate contributions towards, an 8FE secondary school site within adjoining HCC land ownership.

See additional discussion of the school requirement in answer to Q2 below.

- 1.13 The proposed SPAGAs are shown in LPCD 02.06 - Draft Policies Map 4 of 4 (South-East) (2024). N.B. the SPAGAs north of the River Colne are those within site B6 and within HCC ownership, there is an adjacent proposed SPAGA south of the River Colne that is associated with the Strategic Rail Freight Interchange (SRFI).

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

- 2.1 Local Plan Part B Policy B6 – West of London Colney refers to the proposed secondary school as follows:

1. A site for, and appropriate contributions towards, an 8FE secondary school site within adjoining HCC land ownership.

4. Junction priority and segregated cycle access from London Colney and Napsbury Park to the new secondary school will be required....

- 2.2 INF 01.02 - Appendix A.1 SADC Infrastructure Schedule (2024) includes the following information:

New Secondary School at West of London Colney

A site for, and appropriate contributions towards, an 8FE secondary school site within adjoining HCC land ownership.

Delivery Period: 2040+

Funding Source: Developer Contributions

- 2.3 INF 11.01 - PP&C Local Plan Evidence Education Need and Provision (June 2024) includes the following references:

Local Plan Provision for St Albans and Surrounding Settlements

3.10. The Regulation 18 Local Plan made provision for over 5,500 new homes, including existing commitments, across the greater St Albans area (the city and surrounding settlements such as London Colney). Using the tiered strategic planning approach, this equates to planning to be able to accommodate approximately 13FE of demand. ...There are also two new secondary school sites (East St Albans and London Colney) providing up to 16FE of new provision.

St Albans City and Surrounding Settlements

5.5 The draft plan makes provision for over 5,500 new homes, including existing commitments, across the wider St Albans area (the city and surrounding settlements such as London Colney). Using the tiered strategic planning approach, this equates to planning to be able to accommodate approximately 13FE of demand...

5.7 At the secondary phase, the inclusion of two new secondary school sites (East St Albans and London Colney) is supported; they would be able to provide up to 16FE of new provision as necessary to meet future demand.

- 2.4 INF 06.02 - Potential Secondary School Sites HCC (2011) includes an assessment of the London Colney Secondary School site and extracts are set out below. It concluded that a secondary school could be accommodated on the site, which is owned by HCC. However, it was not taken forward in 2011 because (most) local children go to Francis Bacon School (which has capacity to expand). The secondary school at London Colney was subsequently brought forward to meet the needs of new homes in St Albans and Surrounding Settlements and has therefore been included in the SADC IDP Schedule and Local Plan.

Conclusions

Advantages The site is large enough for school and attached playing fields together with some residential development. The site is flat and visually enclosed being of low-medium sensitivity to development. Vehicular access could be achieved from Shenley Lane. Pedestrian access could be achieved although it is likely that a new footway may be required on the western side of Shenley Lane along the site boundary. All technical investigations have been undertaken and there are no significant known impediments to development at this stage. The land is in the ownership of the County Council.

Disadvantages The site is in the Green Belt. Pupils in London Colney go to Francis Bacon School (which has capacity to expand) and there is no requirement to establish a secondary school; this would not be a preferred location for a new secondary school.

Development Principles

Although this site is in the Green Belt it is adjacent to the urban area of London Colney and there is residential development to the north. A masterplan has already been prepared for this site to show how residential development could be sensitively accommodated given the Conservation Area status of the Napsbury Park development to the immediate north. Vistas and structural landscaping are required to be maintained through the development. In order to maintain the required vistas and retain a sensitive relationship with the land to the north it would be more appropriate to locate residential development on the north part of the site and a school site on the southern part of the site where the mass of buildings may be more extensive than residential development. It is recognised that a development brief would be required for the site to control the form, layout and type of both the residential and educational development proposed. The residential development parcels could accommodate up to 180 units on a site area of 3.90ha. The school building zone would be located on land to the south of the residential development. The playing fields would lie to the west of the existing footpath that bisects the site but adjacent to the school site.

Technical investigations

A full range of technical investigations have already been undertaken which have determined that there are no significant impediments to development.

Conclusion

An 8FE school could be accommodated on this site together with a modest residential development with a robust mitigation strategy in respect of landscape impact. A development brief would be required to guide development. The site is in the ownership of Hertfordshire County Council and as such would be available for development should planning permission for an alternative use be granted...

- 2.5 The evidence sets out the reasons for allocating land for the new secondary school in London Colney as demonstrated above. Essentially, housing growth and consequent pupil growth in the long term in the area will require an additional secondary school and this site is the preferred location. The SADC IDP Schedule indicates that the school will be delivered post 2040+, on land owned by HCC, and the funding source is developer contributions.

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?

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

- 3.1 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?

- 3.2 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.

- 3.3 The Green Belt Review Report GB 02.02 (2023) sets 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.
- 3.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023).
- 3.5 The site was also identified in GB 04.02 - Green Belt Review Sites and Boundary Study (superseded) (2014). It set out:

S7: Land at London Colney

Boundary Review

9.5.2. The land to the southwest of London Colney is clearly defined to the east through a combination of the settlement edge and Shenley Lane. The northern edge is bound by a wooden fence, although beyond this lies part of Napsbury Park, which comprises a clearly defined limit to development. The south-east and south-west boundaries comprise a combination of hedgerow and tracks (which are also Public Rights of Way or permissive paths). While the latter boundaries are clearly defined on the ground, structural landscape planting would help to define the edge and separate the settlement edge from the adjacent landscape.

9.5.3. The land on the eastern edge of the sub-area also has clearly defined edges in almost all directions, with the urban edge of London Colney to the east, M25 to the south, and hedgerows to the west. Broad Colney Nature Reserve and River Colne lie along the northern edge, and this edge may require reinforcement to provide

separation between these features and new development. However due to historic workings and landfill on land adjacent it is considered that at this stage this site should not be considered for potential development in the absence of a thorough understanding of ground conditions.

- 3.6 Relevant considerations are also set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024). Pages 53 and 54 set out:

West of London Colney

Site Location: The site is located on the western edge of London Colney. The existing settlement of Napsbury Park abuts the northern site boundary, with residential housing and schools to the east. The western and southern boundaries of the area to be removed from the Green Belt are defined by an access track that runs between Shenley Lane and Napsbury Park.

...

Settlement Form + Edge Character:

- Low density and high-quality landscape edge of Napsbury Park to the north, in contrast to high density almost grid like settlement pattern to the east – interface between the two.*
- River Colne corridor to the south. Open North Drive along eastern edge...*

- 3.7 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 SA-147, 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 necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.

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

Northern boundary – Field edge bordering Napsbury Park

Western boundary – Track that runs between Napsbury Park and South Lodge,

forming a liner extension to the Napsbury Park Grade II Registered Park and Garden

Southern boundary – Vehicular access track between Shenley Lane and South Lodge

- 3.9 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.

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

- 4.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 4.2 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) and as shown in answer to Q1 above.

- 4.3 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. Further there are existing areas of significant built development created since the last Local Plan was adopted in 1994, identified in the Green Belt Review stage 2, where the Council has concluded that the necessary 'Exceptional Circumstances' exist to amend the green belt boundaries.

- 4.4 In relation to the specific case in this location, West of London Colney, AL2 1LN, the specific localised Green Belt impacts are well understood because of the findings of GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023), as set out in answer to Q3 above.
- 4.5 As set out in answer to Q1 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site B6 for potential allocation in the Plan and recommended the site to progress.

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 09.04 - Transport Impact Assessment Appendix 1 2024 London Colney (2024) includes:

3. Access Strategy

The site has direct access onto Shenley Lane. As well as primary access from Shenley Lane, safe and attractive site access for pedestrians, bicycles and vehicles must be provided that connects through and outside the site via Napsbury Park. 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?

- 5.5 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.
- 5.6 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

...

3. *As well as primary access from Shenley Lane, safe and attractive site access for pedestrians, bicycles and vehicles must be provided that connects through and*

outside the site via Napsbury Park. A suitable cycle friendly crossing will be required with signal lights.

- 4. Junction priority and segregated cycle access from London Colney and Napsbury Park to the new secondary school will be required. Access to the Public Right of Way to the south will be required, and support for the enhancement of the route through to Colney Street may be required. All Rights of Way on the site must be retained.*
- 5. Improvements via delivery or contributions of enhancement of walking / cycling links to the Town Centre and retail park.*
- 6. Delivery of / Contributions to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. Including but not limited to significant improvements to cycling facilities along Shenley Lane and between the site and the Town Centre (as per the South Central GTP, LCWIP and validation work undertaken by the County Council).*

- 5.7 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 How has the effect of development on the setting of 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?

- 6.1 The effect of development on the setting of designated heritage assets has been considered through the undertaking of a Heritage Impact Assessment and through the related policy requirements. These had particular regard to the Napsbury Hospital Registered Park and Garden and the Napsbury Park Conservation Area. As set out further below, potential effects of development on the setting of the All Saints Pastoral Centre were considered, but scoped out of further assessment in the Heritage Impact Assessment.
- 6.2 The strategy for undertaking Heritage Impact Assessments (HIAs) for certain sites was summarised in EDH 04.01 - Heritage Impact Assessment Draft Cover Report (2024) as follows:

2. Background

2.1. Prior to the Regulation 18 Draft Local Plan Consultation, which ran from July to September 2023, the Council identified that a number of the proposed site allocations could impact on the historic environment by affecting the setting of nearby heritage assets. At that stage it had not provided site-specific HIAs as part of its evidence base, but the intention was for these to be undertaken to a proportionate degree ahead of the Regulation 19 Plan.

2.2. The Regulation 18 Consultation Historic England (HE) response concurred with the Council's intention to produce proportionate site-specific HIAs to inform the Regulation 19 Plan. HE advised that the purpose of the HIAs will be to identify any heritage assets which could be affected by development of a given site, to consider their significance (including any contribution made by their setting), and assess the impact that any proposed development might have on the significance of those assets. HE suggested that the best way to explore options for mitigation is through the preparation of site-specific HIAs; particularly for large strategic sites or sites where there are particularly significant heritage issues e.g. highly graded heritage asset either on site or in close proximity. HE made clear that it is a question of proportionality; the bigger the site or the more important the heritage issues, the more evidence they would expect to see.

2.3. Through ongoing dialogue with HE it was established that a total of 52no. of the Regulation 19 allocation sites should be subject to the Council's Heritage Impact Assessment 2024, and the Council appointed Essex Place Services to undertake the longer and more detailed assessments. The proportionate approach agreed with HE resulted in the following HIA work being undertaken:

...

a) Detailed Site Assessments undertaken by Essex Place Services for the following 8no. sites:

...

- *B6 - West of London Colney, AL2 1LN*

6.3 As such, this site was one of the 8no. sites subject of Detailed Site Assessments undertaken by Essex Place Services, recognising the potential heritage impact of the allocation. This HIA is at EDH 04.04 - Heritage Impact Assessment Appendix 3 B6 West of London Colney (2024).

6.4 Section 6 of the HIA sets out the 'Potential Impact of Development' with three sub-sections focusing respectively on potential impacts on the Designated Heritage Assets of Napsbury Hospital Registered Park and Garden and Napsbury Park Conservation Area; and potential impacts in relation to Archaeology.

6.5 The HIA's 'Conclusions and Recommendations' section reads as follows:

7. Conclusions and Recommendations

7.1 This Heritage Impact Assessment has been prepared by Place Services for St Albans City and District Council. This document provides an assessment of heritage impact for development of Site B6 – West of London Colney ('the Site') as referred to in the Local Plan.

Design Recommendations & Mitigation

7.2 If the Potential Allocation Site proceeds, a detailed heritage impact assessment will be required with mitigation discussed with the Conservation Officer to attempt to

minimise harm to the Grade II Napsbury Hospital Registered Park and Garden and the Napsbury Park Conservation Area.

7.3 Early discussions should be undertaken with Historic England and the Local Planning Authority, as appropriate, to discuss appropriate layouts within the context of the heritage assets affected. This should consider how attempts to avoid or minimise harm to the assets have been explored, for example reducing housing quantum/density and the careful consideration of the location, orientation, density, and scale of development within the Site.

7.4 There is greater scope to increase housing density to the south-east portion of the Site, with the aim of retaining a sense of the open landscape between the heritage assets and the existing development of London Colney, as well as siting development away from the park and garden/conservation area and South Lodge. With regard to the education provision, there is greater scope to locate development within the southern portion of this area, in order to retain an area of open landscape in proximity to the heritage assets. The northern portion of this area could be utilised for informal open space, although formal sports pitches should be located closer to built form. This is due to potential unintended adverse effects to the setting of the heritage assets through diurnal changes and increased lightspill from floodlighting. Mitigation should include an appropriate landscaping scheme; however, mitigation on its own would not be sufficient to minimise harm.

7.5 Regarding archaeology, early discussion should also be held with the Local Planning Authority to define an appropriate programme of archaeological evaluation to both assess the extent of the known archaeology as well as define previously unknown deposits within the Site to ensure either their preservation within the development or preservation by record where this is thought to be appropriate. This assessment has identified that there is the potential for archaeological deposits within the Site and these should be assessed by a desk-based assessment and evaluation (both intrusive and nonintrusive). The results of these investigations will further inform the development masterplan.

- 6.6 It is considered that heritage protection in line with the above is suitably secured through the requirement in Policy LG1 q) and the allocation Key development requirement 7; as follows:

LG1 – Broad Locations

Proposals within the defined Broad Locations (or unallocated windfall development at this scale) must:

...

q) For sites listed in Appendix 5, be informed by a detailed Heritage Impact Assessment and Archaeological Desk-Based Assessment which address the recommendations of the Council's Heritage Impact Assessment 2024;

...

Key development requirements

7. Through Masterplanning, the layout and design of development should minimise any harm to the setting and significance of the Grade II Napsbury Hospital Registered Park and Garden and the Napsbury Park Conservation Area, and take appropriate account of trees. This includes South Lodge and its access in the south-west / west of the site which form part of the Registered Park and Garden and on which there is an area Tree Preservation Order. This may include the careful consideration of the location, orientation, density, and scale of development within the site and an appropriate landscaping scheme.

- 6.7 It is noted that a main focus of the HIA and the KDR was on potential effects on the Napsbury Hospital Registered Park and Garden and the Napsbury Park Conservation Area. It should be noted that potential effects of development on the setting of the All Saints Pastoral Centre were considered but scoped out of further assessment in the HIA, as set out under the subheading 'Scoping of Designated Heritage Assets' as follows:

Scoping of Designated Heritage Assets

3.3 Whilst there are a number of heritage assets within proximity of the Site, it is considered that the majority can be scoped out of further assessment.

3.4 The topography of the land slopes down to the south of the Site boundary. Consequently, the Grade II listed London coal duty marker on east side of Broad Colney Bridge (List Entry Number: 1174719) is located on lower ground, as well as being largely surrounded by extensive tree cover located on the riverbanks, which separate the heritage asset from the Site. Due to these factors and the nature of this particular heritage asset, it is considered that its significance would not be impacted by proposed development. The Scheduled Colney Chapel moated site (List Entry Number: 1010718) is located 260 metres to the south of the closest boundary of the Site, however Barley Mo Farm, with its substantial outbuildings, is located between the Scheduled asset and the Site, as are the tree-lined riverbanks. The Scheduled asset is also located within woodland. It is therefore recommended that the Scheduled site is scoped out. Furthermore, the Grade II listed Voluntary Missionary Movement (List Entry Number: 1103639), the Grade II listed Farm Cottage and adjoining Garden Walls at All Saints Pastoral Centre (List Entry Number: 1347207) and the Grade II listed All Saints Pastoral Centre, including Chapel, (List entry Number: 1295615) are located further to the south beyond the River Colne and as such, it is recommended that these assets are scoped out.*

- 6.8 It should also be noted that further discussion with Historic England in relation to their Regulation 19 comments for this site resulted in agreement that no change is required for soundness, and that the aforementioned Key development requirement plus the relevant policy in chapters 3, 11 and 12 of Part A would provide an appropriate degree of protection. This is set out at M12I1Q7 - Appendix 2 - SoCG SADC and HE October 2025 and M12I1Q7 - Appendix 3 - HE Comments and Agreed Mods October 2025.

- 6.9 Taking the above into account, the effect of development on the setting of designated heritage assets has been considered through the undertaking of a HIA and through the related policy requirements. These had particular regard to the Napsbury Hospital Registered Park and Garden and the Napsbury Park Conservation Area. As set out further above, potential effects of development on the setting of the All Saints Pastoral Centre were considered, but scoped out of further assessment in the HIA. It is also noted that the Council's approach for this site has the agreement of Historic England.

Q7 Is Policy B6 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 7.1 Yes, it is considered that Policy B6 is justified, effective and consistent with national planning policy.
- 7.2 As answered above in Q1, Policy B6 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).
- 7.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in answer to Q1 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 7.4 As set out in answer to Q1 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site B6 for potential allocation in the Plan and recommended the site to progress.
- 7.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site B6 for allocation, which states at paragraph 5.4.35 and 5.4.39:

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

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

- 7.6 Policy B6 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 Update response to Local Plan Reg 19:
- SADC/ED25 - Statement of Common Ground between SADC and Hertfordshire County Council Property
 - SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
- 7.7 Policy B6 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.
- 7.8 Overall, Policy B6 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.
- 7.9 N.B. Policy B6 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C; in order to ensure provision of necessary social infrastructure, and to enable the effective funding and delivery of infrastructure and measures to support active travel necessary to support development.

Policies U2 (Land south west of London Colney Allotments), UC20 (104 High Street) and UC27 (Berkely House)

Q1 Are the 'Urban Settlement' sites within London Colney justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.1 Yes, it is considered that the 'Urban Settlement' sites within London Colney are justified, effective and consistent with national planning policy.
- 1.2 These site allocations are justified because they follow the submitted Plan's spatial strategy which locates growth to make the most sustainable use of land in urban areas and develop brownfield land. The sites are in the settlement of London Colney which is a Tier 3 – Small Town Settlement in the submitted Local Plan Settlement Hierarchy. Table 1.3 – Settlement Hierarchy in LPCD 02.01 - Reg 19 Local Plan Part A (2024) on page 10 sets out:

Tier 3

Small Town

Third largest population size Some employment provision and high order services including retail and leisure, but currently no secondary school Offers bus routes and cycle provision but lacking connectivity by mainline train.

- 1.3 These site allocations are effective as they are developable over the plan period. These sites progressed to site selection as they were indicated as being available for development over the plan period by the respective landowner(s). Correspondence from landowners have reiterated their position that the sites remain available for development within the plan period.
- 1.4 These site allocations are consistent with national planning policy as they enable the delivery of sustainable development in accordance with policies in the NPPF December 2023. The relevant policies for sustainable development which applies are:

11. Making effective use of land

123. ... Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

124. Planning policies and decisions should: ... c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).

125. Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where

necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.

- 1.5 Relevant evidence for site availability, suitability and deliverability is set out in the table below.

Table 1 - Evidence of Site Availability, Suitability and Deliverability for 'Urban Settlement' sites within London Colney

Site Number	Site Allocation Reference	Location	Tenure	Site Availability	Site Suitability (Extracted from LPSS 02.14 - Urban Sites Recommended Urban HELAA Proformas (2024) and LPSS 02.15 - Urban Sites Recommended UCS Proformas (2024))	Site Deliverability (Details of site work to actively progress the site)	Years Deliverable/ Developable
1	U2	Land South West of London Colney Allotments, AL2 1RG	Private	HELAA 04.06 Annex 6 London Colney (2021) Availability Conclusions (page 48) sets out: Yes. The site has been put forward through the 'call for sites' process, indicating it is available. Currently no known legal or land ownership issues are associated with the site preventing development from coming forward.	Page 3: Qualitative Assessment ... The site is in London Colney, a Tier 3 Settlement in the Settlement Hierarchy. The site is approximately; 740 metres from a primary school, 2.7 kilometres from a secondary school, 130 metres from a bus stop, 4.7 kilometres from St Albans mainline railway station and 310 metres from a District Centre. Part of the site is within the 100 metres buffer of a listed building. Two individual TPO can be found along the site's south western boundary. The site contains an area of undesignated woodland/mature trees to the north west and is adjacent to another along the south east border. Some individual mature trees and scrub can be found in other areas of the site. Potential access is via two lane London Colney High Street. There is a public right of way footpath along the southern boundary of the site. The southern site boundary is adjacent to contaminated land. This site is recommended to progress.	Active project – Landowner has responded in summer 2025 to confirm that the land in question is vacant and that therefore there are no tenancy issues. The landowner has reported a strong level of developer interest in the site and does not envisage any issues with prompt progression towards a planning consent.	2032/33 – 2033/34
2	UC20	104 High Street, London Colney, AL2 1QL	Private	SADC/ED81B Appendix 2: Urban capacity site sifting (page 31) Outcome sets out: Site in single ownership;	Page 48: Qualitative Assessment ... The site is within the urban area of London Colney, a Tier 3 Settlement in the Settlement Hierarchy. The site is adjacent to two individual TPOs. The site is within a 100 metres buffer of a list building and is adjacent to an area of undesignated woodland and a few mature trees. The site contains contaminated land. Potential access is via	Active project – Landowner has responded in summer 2025 to confirm that there is a realistic prospect of development being delivered. They confirmed that they have instructed planning consultants to undertake feasibility work on a proposed scheme with the intent of	2033/34 – 2034/35

Site Number	Site Allocation Reference	Location	Tenure	Site Availability	Site Suitability (Extracted from LPSS 02.14 - Urban Sites Recommended Urban HELAA Proformas (2024) and LPSS 02.15 - Urban Sites Recommended UCS Proformas (2024))	Site Deliverability (Details of site work to actively progress the site)	Years Deliverable/ Developable
				<i>landowner responded positively for site inclusion</i>	<i>London Colney High Street. The site is recommended to progress.</i>	bringing forward a scheme in the next year. The landowner is liaising with adjoining landowners to see how to co-operate to bring the sites (UC20 and U2) forward together	
3	UC27	Berkeley House, Barnet Road, London Colney, AL2 1BG	Private	SADC/ED81B Appendix 2: Urban capacity site sifting (page 32) Outcome sets out: <i>Landowner responded and put the site forward</i>	Pages 49-50: Qualitative Assessment ... <i>The site is within the urban area of London Colney, a Tier 3 Settlement in the Settlement Hierarchy. The site is partially within flood zones 2, 3a + 35% climate change and 3a + 70% climate change. The Strategic Flood Risk Assessment Level 2 requires this site to pass the exception test. Most of the site is within a conservation area. Within the site is a listed building. The site is also within the 100 metres buffer of two other listed buildings and three locally listed buildings. The site is within the 100 metres buffer of deciduous woodland Priority Habitats. Also, there are a number of mature trees along the north eastern, northern and western site boundaries. Potential access is via Willowside. The site is recommended to progress.</i>	UC27 meets NPPF December 2023 definition of a developable site, as it is in a suitable location for housing development with a reasonable prospect that it will be available and viably developed at the point envisaged. Landowner confirmed in summer 2025 that the site had a reasonable prospect of coming forward over the longer term.	2036/37