

St Albans City & District Council Local Plan Examination

Green Belt Previously Developed Land (PDL) – Additional Clarification

1. Background

- 1.1 The SADC draft Local Plan was submitted on 29 November 2024 for independent Examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). At the Stage 1 Hearing sessions there was discussion around the approach to Green Belt Previously Developed Land (PDL) and site allocations, with queries raised by the Inspectors and by omission site promoters. After hearing the verbal submissions in this regard, the Inspectors sought additional information as to how Green Belt PDL sites were assessed, particularly in relation to 3 omission sites which were discussed in the hearings (Harper Green, Hanstead Park and Notcutts). This Paper seeks to address the matters raised.

2. The Council's Approach to Green Belt PDL

- 2.1 The Council's Approach to Green Belt PDL is set out in the '*Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations*' Paper (LPSS.01.01) as follows:

3.3. *The Local Plan seeks to make the most effective and efficient use of land in the District and has undertaken an extensive and rigorous search for Previously Developed Land (PDL) (also known as 'Brownfield land' in national policy) within existing built-up areas. The approach has been underlain by the concept of 'leaving no stone unturned' in the search for appropriate sites on brownfield land. This extensive search has also included potential PDL opportunities in the Green Belt. However, an insufficient supply of Previously Developed Land led to the requirement to identify sites on Green Belt Land.*

- 2.2 The Council's MIQ response under 'Matter 2 - Issue 5 Site Selection Methodology' summarises the overall site selection process, including in relation to Green Belt PDL sites as follows:

- 6.5 *The Site Selection process overall effectively took, in simple terms:*
- *all potentially sustainable development proposals that were available in the urban area*
 - *then all potential sustainable development proposals on Green Belt Previously Development Land*
 - *then all potential sustainable development proposals recommended for further consideration in the Green Belt Review (unless a specific reason ruled them out)*
 - *then, in order to achieve enough development capacity to meet the Standard Method for housing need figure in full, sites considered in the Green Belt Review (which were inherently in more sustainable locations than those not included in the Green Belt Review and would not cause 'holes' in the Green Belt) which offered significant Economic, Environmental and Social benefits.*

3. Explanation of the Sites Allocated as Green Belt - Previously Developed Land

- 3.1 Part B of the draft Local Plan includes 3no. 'Green Belt - Previously Developed Land' site allocations, contributing a total of 137 homes. The primary reason that these sites were allocated was that they were on those Green Belt HELAA sites which contained built development that was considered likely to meet the NPPF Annex 2 definition of 'Previously Developed Land'¹; sufficient to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception to inappropriate development in the Green Belt:

154. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

...

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or*
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

- 3.2 Secondly, there were no significant impediments to developing the site in terms of constraints or sustainability identified.
- 3.3 In the context of sites put forward through the HELAA process, consideration of the NPPF paragraph 154 g) PDL exception to inappropriate development in the Green Belt represented a reasonable approach, in the Council's view. This approach reflects the high priority given to utilising PDL when considering releasing Green Belt land for development and takes account of the quantum of development that would be likely to be approved in a planning application on the basis of meeting the NPPF PDL exception.
- 3.4 The 3 HELAA sites which were considered suitable (see above) and which were considered likely to yield 5 or more homes (net) if applying the above NPPF PDL exception are set out in Part B of the Plan. The following table lists them, along with an explanation of their indicative capacity:

¹ The NPPF 2023 Annex 2: Glossary defines Previously developed land as follows:

Previously developed land: *Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.*

Allocation Site Reference	Allocation Site Name	Hectares	Indicative Capacity	Explanation of Indicative Capacity
P1	Smallford Works, Smallford Lane, AL4 0SA	3.34	58	Standard Calculation for 2.4ha (being the whole site minus 28%, reflecting the groundwater and surface water flood risk identified in the SFRA Level 2). 'Standard calculation approach' is considered a reasonable approach noting that a significant portion of the site is currently developed
P2	Land at North Orbital Road, AL2 1DL	1.88	64	Standard Calculation for whole site - considered a reasonable approach noting that a significant portion of the site is currently developed
P3	Friends Meeting House, Blackwater Lane, Hemel Hempstead, HP3 8LB	1.66	15	Standard Calculation for 0.45ha – which takes account of the limited amount of above-ground built form on the site in the context of the NPPF paragraph 154 g) PDL exception to inappropriate development in the Green Belt

N.B. 'Standard Calculation' refers to the approach set out in section 7 'Housing capacity' of the 'Housing Land Supply, Windfall and Housing Capacity Evidence Paper' (HOU.01.02), which was published alongside the Regulation 19 consultation

- 3.5 In summary, the indicative capacity for sites P1 and P2 reflected the standard approach to calculating capacity (as set out in the aforementioned Evidence Paper HOU.01.02) for the whole site; as the extent of existing built development was comparable to that expected to result from applying the Council's assumptions in its standard approach to capacity; and as such a 'standard approach' level of development was considered likely to meet the NPPF paragraph 154 g) PDL exception to inappropriate development in the Green Belt.
- 3.6 The indicative capacity for site P3 reflected a reduced 'Site area' for use in the calculations so as to broadly reflect the current amount of built form on the site. It was considered that only at this reduced scale of development would it be in line with the NPPF paragraph 154 g) PDL exception to inappropriate development in the Green Belt.
- 3.7 The Council's proforma assessments of the above sites are found within the 'Green Belt Previously Developed Land Sites – Recommended to Progress' document (LPSS 02.07). The proforma assessments identified no significant impediments to developing the site in terms of constraints or sustainability, and recommended that the sites progress.
- 3.8 Taking the above into account, and noting the findings of the Council's proforma assessments of these sites, it was considered appropriate to allocate these 3 sites, in line with the Council's agreed Site Selection Methodology; and it is considered that the indicative capacities for these allocation sites are justified.

4. Approach to Other HELAA sites which contain Green Belt Previously Developed Land

Within the Settlement Buffers

- 4.1 The other Green Belt HELAA sites which were located at least partially within a settlement buffer were considered in the Council's Local Plan Site Selection proformas. The table at Appendix A of this paper lists those HELAA sites which the proforma assessments found contained at least 1% PDL, links to where they were considered in the Council's proformas, and sets out the summary reasons for not allocating as a Green Belt PDL site. Overall, it was considered that none of these sites had sufficient PDL to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception to inappropriate development in the Green Belt, so none were proposed as allocations.
- N.B. It was also the case that none of the sites with less than 1% PDL had sufficient PDL to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception.

Outside the Settlement Buffers

There was no additional proforma assessment of the HELAA sites located outside the settlement buffers as to the extent of previously developed land they contained; but there was an informal officer review of these sites as to whether it would be appropriate to allocate any as Green Belt PDL sites ahead of the Regulation 19 stage. Overall, it was considered that none of these sites had sufficient PDL to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception to inappropriate development in the Green Belt, so none were proposed as allocations. The table at Appendix B of this paper lists those HELAA sites which were rejected due to location outside the settlement buffer (not assessed at Proforma stage)²; and sets out the summary reasons for not allocating as a Green Belt PDL site.

- 4.2 It should also be noted that within the overall windfall allowance in the housing trajectory there is allowance for dwellings from small unallocated Green Belt PDL sites, based on historical evidence.

5. Consideration of Other Sites put forward on the basis of comprising Green Belt Previously Developed Land which were discussed in the Stage 1 Examination Hearings

- 5.1 Those omission sites which were put forward for inclusion on the basis that they comprise Green Belt PDL, and which were also subject of Hearing Statements and discussed in the Stage 1 Examination Hearings, comprise the following:

1. Harper Green.

² These are the 86no. sites from the 'Site Sifting Process Addendum – June 2025' Appendix 1 Table 2; plus the single site 'Land at Turner's Hall Farm, west of Harpenden' identified at Table 1 as a site that would not have been assessed at Proforma stage due to being outside the Green Belt buffer.

Promoted by Bloor Homes and the Department of Health and Social Care (Representor Reference 315)

2. Hanstead Park

Promoted by Linden Wates (Bricket Wood) Limited (Representor Reference 316)

3. Notcutts

Promoted by Stonebond Properties (Representor Reference 194)

- 5.2 It is considered (and was considered at the time in relation to the relevant HELAA sites) that none of these sites have sufficient PDL to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception to inappropriate development in the Green Belt. Appendix C of this Paper provides a comparison of the submitted Regulation 19 Response image of the promoted site and an aerial image of the existing land; which demonstrates the limited extent of existing permanent built form at each of the sites.
- 5.3 Their non-allocation is considered to be consistent with the Council's agreed Site Selection Methodology. As a result, the above sites would not fall to be allocated in the Plan.

Appendix A – Summary Reasons why sites were not allocated as Green Belt PDL – Sites In a Buffer

Appendix B – Summary Reasons why sites were not allocated as Green Belt PDL – Sites Outside a buffer

Appendix C: Comparison of the submitted Regulation 19 Response image of the promoted site and an aerial image of the existing land: Harper Green, Hanstead House and Notcutts

Appendix A – Summary Reasons why sites were not allocated as Green Belt PDL – Sites In a Buffer

Overall, it was considered that none of these sites had sufficient PDL to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception to inappropriate development in the Green Belt, so none were proposed as allocations.

Proforma Site Ref	HELAA Ref	Site Address	Considered in which Proforma?	Pages	% PDL in proforma	Summary reasons for not allocating as a Green Belt PDL site
M-032	SM-09-21	Land North of Ragged Hall Lane, St Albans, AL2 3LD	Green Belt Buffer Sites Part 1 – Not Recommended to Progress	29-30	4%	Limited existing permanent built form, and the majority of the PDL is outside the Green Belt
C-073	HT-28-21	Site A and C Common Lane, Harpenden, AL5 5FH	Green Belt Buffer Sites Part 1 – Not Recommended to Progress	35-36	24%	Limited existing permanent built form, apart from existing houses
C-080	LC-04-16	All Saints Pastoral Centre, Shenley Lane, AL2 1AF	Green Belt Buffer Sites Part 1 – Not Recommended to Progress	51-53	7%	The majority of the existing buildings are Grade II or Grade II* listed, unclear to what extent residential conversion would be appropriate in relation to heritage impacts; limited existing other permanent built form
C-119	R-24-16	Hillbury, Dunstable Road, Redbourn, AL3 7PP	Green Belt Buffer Sites Part 1 – Not Recommended to Progress	60-61	14%	Limited existing permanent built form
C-101	R-07-21	103 - 105 Dunstable Road, Redbourn, AL3 7PR	Green Belt Buffer Sites Part 1 – Not Recommended to Progress	66-67	21%	Limited existing permanent built form, apart from existing house(s)
C-108	R-13-21	Land East of Lybury Lane, Redbourn, AL3 7JQ	Green Belt Buffer Sites Part 1 – Not Recommended to Progress	70-71	4%	Limited existing permanent built form, apart from existing house(s)
C-260	WH-08-21	13 Sauncey Wood, Harpenden, AL5 5DW	Green Belt Buffer Sites Part 1 – Not Recommended to Progress	111-112	4.80%	Limited existing permanent built form, apart from existing house(s)
M-042	STS-65-21	St Stephen Parish Centre, Station Road, Bricket Wood, AL2 3PJ	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	3-4	21%	Limited existing built form on site, and unclear to what degree existing community provision would be affected
C-224	STS-44-18	12 Mount Pleasant Lane, Bricket Wood, AL2 3XA	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	5-6	100%	Limited existing permanent built form, and redevelopment of the site granted permission in 5/2021/0870 for three dwellings
C-227	STS-47-21	Land east of Lye Lane, Bricket Wood, AL2 3TF	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	21-22	5%	Limited existing permanent built form apart from existing dwellings, and unclear to what extent existing non-residential buildings are in agricultural use

Proforma Site Ref	HELAA Ref	Site Address	Considered in which Proforma?	Pages	% PDL in proforma	Summary reasons for not allocating as a Green Belt PDL site
C-230	STS-49-21	Former Butterfly World, Miriam Lane, AL2 3NS	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	29-30	40%	Unclear to what extent existing buildings can be considered lawful and permanent for the purpose of assessing against the PDL exception
M-040	STS-34-21	Land at Harperbury Hospital, Harper Lane, WD7 9FG	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	45-47	10%	Limited existing permanent built form in the part of the site put forward for additional housing development beyond that recently constructed under application 5/2015/0990 and other existing housing
C-019	CH-20-21	Land at the Dak, Colney Heath Lane, AL4 0TN	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	70-71	7%	Limited existing permanent built form
C-011	CH-11-21	Smallford Stables, 187 Colney Heath Lane, AL4 0TP	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	72-73	15%	There is an existing Grade II listed building in the site, assumption it would be retained; unclear to what extent residential conversion would be appropriate in relation to heritage impacts; limited existing other permanent built form
M-003	CH-26-21	Roehyde Farm, Roestock Lane, Bullens Green, AL4 0QW	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	78-79	3%	The site contains two listed buildings and is adjacent to another; assumption they would be retained; unclear to what extent residential conversion would be appropriate in relation to heritage impacts; limited existing other permanent built form
B-001	CH-03-21	Land adjacent to A1M and North Orbital Road, Roehyde, AL4 0RZ	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	80-81	27%	Unclear to what extent existing buildings in the part of the site that is within St Albans District can be considered lawful and permanent for the purpose of assessing against the PDL exception
M-004	CH-35-21	Smallford Farm and Smallford Pit, St Albans, AL4 0SA	Green Belt Buffer Sites Part 2 – Not Recommended to Progress	82-84	2%	Limited existing permanent built form

Appendix B – Summary Reasons why sites were not allocated as Green Belt PDL – Sites Outside a buffer

Overall, it was considered that none of these sites had sufficient PDL to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception to inappropriate development in the Green Belt, so none were proposed as allocations.

HELAA Ref	Site Address	Summary reasons for: Not allocating as a Green Belt PDL site / Assuming <5 homes (net) if applying the NPPF 2023 PDL exception
CH-05-16	Radio Nursery and 54 Oakland Lane, Smallford	Comprehensive redevelopment subsequently granted permission in 5/2017/0634, and implemented
CH-06a-21	Land at Tyttenhanger, Tarmac	Limited existing permanent built form; and non-residential proposed use
CH-06b-21-1	Land at Tyttenhanger, Tarmac	Limited existing permanent built form
CH-06b-21-2	Land at Tyttenhanger, Tarmac	Limited existing permanent built form; and non-residential proposed use
CH-07-21	Land at Sleafshyde	Limited existing permanent built form
CH-07a-16	Ye Olde House, adjacent to Sleafshyde Lane	Limited existing permanent built form
CH-07b-16	Ye Olde House, adjacent to Sleafshyde Lane	Limited existing permanent built form
CH-09-18	Land r/o 33-35 Station Road, Smallford	Limited existing permanent built form
CH-14-21	Land at Colney Heath (Tarmac)	Limited existing permanent built form
CH-15-18	Land Adjacent The Barley Mow Caravan Site, Barley Mow Lane, Smallford	Limited existing permanent built form
CH-16-18	Land Adjacent The Barley Mow Caravan Site, Barley Mow Lane, Smallford	Limited existing permanent built form
CH-17-21	Manor Garden Park, Roundhouse Farm, Roestock Lane	Limited existing permanent built form
CH-18-21	Radio Casa, Oaklands Lane	Limited existing permanent built form
CH-21-18	Land at High Street, Colney Heath	Limited existing permanent built form
CH-22-18	Land at Coursers Road, Roestock	Limited existing permanent built form
CH-22-21	Land at Colney Heath Farm, Coursers Road	Limited existing permanent built form
CH-23-21	Land at Round House Farm	Limited existing permanent built form
CH-24-21	Affinity Water, Roestock Lane	Limited existing permanent built form

CH-25-21	Smallford Farm	Limited existing permanent built form
CH-29-21	Notcutts Garden Centre, Hatfield Road	Limited existing permanent built form in the part of the site put forward for housing development ³
CH-31-21	Land Off Of Bullens Green Lane, Roundhouse Farm	Limited existing permanent built form, and development of the site subsequently granted permission in 5/2020/1992
CH-33-18	Land at Hill End Farm, Barley Mow Lane, Tyttenhanger	Limited existing permanent built form. Listed building.
CH-37-21	Land at Tollgate Road, Colney Heath	Limited existing permanent built form
CH-39-21	Land at Smallford, South of Hatfield Road	Limited existing permanent built form
HR-01-18	Land West of Harpenden	Limited existing permanent built form
HR-04-18	Brickfields, Coles Lane, Kinsbourne Green, Harpenden	Limited existing permanent built form
HR-05-16	Land at Kinsbourne Green, Harpenden	Limited existing permanent built form
HR-07-18	Land West of Harpenden	Limited existing permanent built form, apart from existing houses
HR-08-18	Land between New House Farm and Annables House, Annables Lane, Kinsbourne Green	Limited existing permanent built form
HR-09-18	Land at Turner's Hall Farm, west of Harpenden	Limited existing permanent built form, apart from existing houses
HR-12-18	Land between Garden Cottage and Rosalia Cottage	Limited existing permanent built form
LC-09-21	Land adjacent to 98 Harper Lane, Radlett	Limited existing permanent built form
LC-15-17	North east of London Colney, South of A414	Limited existing permanent built form
R-11-21	Land adjacent 14 Luton Lane, Redbourn	Limited existing permanent built form
R-12-16	Land to North of Redbourn	Limited existing permanent built form
R-12-18	Land to North of Redbourn	Limited existing permanent built form
R-12-21	Land at Redbourn Farm, West of Dunstable Road	Limited existing permanent built form
R-14-17	Land at The Stables, Nicholls Farm, Lybury Lane, Redbourn	Limited existing permanent built form, also unclear if the existing buildings meet the NPPF definition of PDL

³ The HELAA submission – in [HELAA 08.09 - Colney Heath Parish Part 9 \(2021\).pdf](#) (from page 49) - states: “For the avoidance of doubt, our client does not intend to close the existing garden centre but is requesting that the entire site, including the garden centre be released from the Green Belt” (top of page 50); and that “The 1.25 hectare field is available for a housing allocation.” (middle of page 52); this field is essentially the land promoted in the Regulation 19 response; see Section 5 and Appendix C of this Paper.

R-15-18	Land to the south west of Bymead Cottage, Luton Lane, Redbourn	Limited existing permanent built form
R-16-21	Land east of Luton Lane and north of A5183	Limited existing permanent built form
R-17-18	Land at White House Farm, Redbourn	Limited existing permanent built form, apart from existing houses; also unclear if existing buildings meet the NPPF definition of PDL
RH-01-16	Redbourn Golf Club, Kinsbourne Green Lane	Limited existing permanent built form
SAN-02-16	East of Woodcock Hill	Limited existing permanent built form
SAN-02-21	Land at Orchard Garage, East of Woodcock Hill, Sandridge	Limited existing permanent built form
SAN-05a-21	Cheapside Farm (Parcel A)	Limited existing permanent built form; also unclear if existing buildings meet the NPPF definition of PDL
SAN-05b-21	Cheapside Farm (Parcel C)	Limited existing permanent built form
SAN-07-18	Land north of St Albans Road, Sandridge	Limited existing permanent built form
SAN-08-18	Parcel A & B Land at Oak Farm, Coopers Green Lane	Limited existing permanent built form
SAN-09-18	Land at r/o Shottfield Close, Sandridge (overlaps with site 26)	Limited existing permanent built form
SAN-09-21	Land north of Sandridge	Limited existing permanent built form
SAN-17-18	Land east of Fairshot Court, north of Woodcock Hill	Limited existing permanent built form
SAN-19-17	Land at Fairshot Court, Woodcock Hill, Sandridge	Limited existing permanent built form, apart from existing houses
SAN-20-18	Land to the north east of Sandridge	Limited existing permanent built form
SAN-20-21	Pound Farm, Shottfield Close	Limited existing permanent built form
SAN-21-18	Pound Farm, High Street, Sandridge	Limited existing permanent built form which would meet the NPPF definition of PDL
SAN-22-18	Land to the west of St Albans Road (south of Hopkins Crescent), Sandridge	Limited existing permanent built form, and development of the site subsequently granted permission in 5/2020/0919
SM-08-18	Land at Centurion Golf Club Hemel Hempstead Road	Limited existing permanent built form

SM-08-21	Centurion Club, Hemel Hempstead Road	It is understood that the existing principal golf club buildings would remain, and there is limited existing permanent built form in the part of the site put forward for development ⁴
STS-01-18	Former HSBC Management and Training Centre	Limited existing permanent built form in the part of the site put forward for additional housing development beyond that recently constructed under application 5/2014/3250 ⁵
STS-15-18	Moor Mill South, Bricket Wood	Limited existing permanent built form
STS-15-21	Orchard Land on the west side of Radlett Road, Colney Street	Limited existing permanent built form
STS-16-21	Land to the West of Kingsley Green, Harpers Lane	Limited existing permanent built form
STS-24-21	Land at Rose Farm	Limited existing permanent built form; also unclear if existing buildings meet the NPPF definition of PDL
STS-25-21	Land on the west side of Radlett Road, Colney Street	Limited existing permanent built form
STS-33-17	Harperbury Hospital, Harper Lane, London Colney	Limited existing permanent built form in the part of the site put forward for additional housing development beyond that recently constructed under application 5/2015/0990 ⁶ and other existing housing
STS-33-18	Land at Harperbury Hospital, Harper Lane, Shenley	Limited existing permanent built form in the part of the site put forward for additional housing development beyond that recently constructed under application 5/2015/0990 ⁸ and other existing housing
STS-36-18	Land Adjacent All Saints Pastoral Centre and Barley Mo Farm	Limited existing permanent built form
STS-40-18	Moor Mill South, Bricket Wood	Limited existing permanent built form; also unclear if existing buildings meet the NPPF definition of PDL
STS-42-18	Land South of Harper Lane, Radlett	Limited existing permanent built form
STS-43-21	Land adjacent to Winslo House, 200 Radlett Road	Limited existing permanent built form; also unclear if existing buildings meet the NPPF definition of PDL; and development of the site subsequently granted permission in 5/2020/1667

⁴ The HELAA submission – in [HELAA 15.01 - St Michael Parish Part 1 \(2021\).pdf](#) (from page 13) - states: “The landholding is occupied at present for a golf club use, which totals 13Ha in total. Only 10.5ha is being considered for Inspired Villages Retirement Village proposal and the balance of landholding will remain as golf course with its associated uses/infrastructure.” (bottom of page 17).



⁵ See Section 5 and Appendix C of this Paper for assessment of the part of the site put forward for additional housing development in the Regulation 19 submission.

⁶ See Section 5 and Appendix C of this Paper for assessment of the part of the site put forward for additional housing development in the Regulation 19 submission.

WH-05-21	Land at Blackbridge off Codicote Road	Limited existing permanent built form; and non-residential proposed use
WH-06-17	Cromwell Piggeries, Marshalls Heath Lane, Wheathampstead	Unclear to what extent existing buildings meet the NPPF definition of PDL; and redevelopment of the site subsequently granted permission in 5/2020/2318
WH-13-18	The Cherry Tree, 261 Lower Luton Road	Limited existing permanent built form
WH-13-21	261 Lower Luton Road	Limited existing permanent built form
WH-16-16	15-17 Castle Rise	Limited existing permanent built form; also unclear to what extent existing buildings meet the NPPF definition of PDL
WH-16-18	Land at 15-17 Castle Rise, Wheathampstead	Limited existing permanent built form; also unclear to what extent existing buildings meet the NPPF definition of PDL
WH-16-21	Land at Castle Rise	Limited existing permanent built form; also unclear to what extent existing buildings meet the NPPF definition of PDL
WH-17-21-1	Land at Cherry Tree Lane	Limited existing permanent built form
WH-17-21-2	Land at Cherry Tree Lane	Limited existing permanent built form; and non-residential proposed use
WH-23-21	Land south of the Slype, Blackmore End	Limited existing permanent built form
WH-26-21	Bowersbury Farm Bower heath lane Harpenden	Limited existing permanent built form; also unclear to what extent existing buildings meet the NPPF definition of PDL
WH-27-18	Land at Dairy Cottage, Lamer Lane, Wheathampstead	Limited existing permanent built form; also unclear to what extent existing buildings meet the NPPF definition of PDL
WH-29-21	Land Adj Waterend House, Waterend Lane	Limited existing permanent built form; and non-residential proposed use
WH-38-18	Land between 17 and 18 Gustard Wood	Limited existing permanent built form
WH-40-21	Land to North of Castle Rise	Limited existing permanent built form
HR-03-18	Land at Turner's Hall Farm, west of Harpenden	Limited existing permanent built form; also unclear to what extent existing buildings meet the NPPF definition of PDL


Appendix C: Comparison of the submitted Regulation 19 Response image of the promoted site and an aerial image of the existing land: Harper Green, Hanstead House and Notcutts

Harper Green:

Reg 19 Response Image of promoted site*:	Aerial Image:
	 <p>© Bluesky International Limited 2024 and onwards</p>



* From [Appendix 2 Concept Materplan 5.11.2024 \[R\]](#)
 [Link to this is on page 2,053 of [LPCD 20.04 - Reg 19 Responses By Consultation Point \(2024\).pdf](#)]

Hanstead Park:

Reg 19 Response Image of promoted site*:	Aerial Image:
 <p>Locations for accommodating additional homes by reference to the approved layout</p>	 <p>© Bluesky International Limited 2024 and onwards</p>

* From Page 37 of [Reg 19 Reps - Linden Wates Bricket Wood Limited - 7 Nov 2024 \[R\]](#):
[Link to this is on page 2,055 of [LPCD 20.04 - Reg 19 Responses By Consultation Point \(2024\).pdf](#)]

Notcutts

Reg 19 Response Image of promoted site*:	Aerial Image from Google Earth:
 <p>NOTCUTTS NURSERY ST ALBANS - Scoping Study - NTS 10240300</p> <p>Figure 1 Emerging Concept Plan</p>	 <p>© Bluesky International Limited 2024 and onwards</p>

* From Page 2 of [Landscape Green Belt Note - Notcutts \[R\].pdf](#).
 [Link to this is on page 688 of [LPCD 20.04 - Reg 19 Responses By Consultation Point \(2024\).pdf](#)]