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## Comment Receipt

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### Files

### Name

Talys Nikan

### Company/Organisation

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### Your interest

. Planning Consultant

**Site address/location (Please provide a map showing the site boundary)**

Land Off Of Bullens Green Lane (Roundhouse Farm), Colney Heath

**Site area (in hectares)**

5.12 (2.48 of which is within St. Alban's District and 2.77 of which is within Welwyn Hatfield District)

**Easting**

521208

**Northing**

205906

**Site Location Plan Attached**

Yes

**Upload Site Location**

Site Location Plan - Land Off Of Bullens Green Lan,  
Colney Heath

**GIS mapping shapefile attached (in .shp file format)** No

**Land ownership (please include contact details if known)**

Maureen Franklin-Smith  
Little Orchard  
Roestock Lane  
Colney Heath  
AL4 0PP  
Raymond Franklin  
32 Poppy Field  
Biggleswade  
SG18 8TU  
Eileen Lawrence  
22 Greyfriars Close  
Bognor Regis  
PO21 5RH

**Current land use**

Agricultural

**Condition of current use (e.g. vacant, derelict)**

Agricultural

**Suggested land use**

Housing

Site proposed for residential development of approximately 100 units, to include policy compliant mix of affordable and self-build units.

## Reasons for suggested development / land use

To contribute toward meeting the local housing need and affordable housing needs of the District in a sustainable location.

<b>Likely timescale for delivery of suggested development / land use</b>	1-5 Years
<b>Contamination/pollution issues (previous hazardous land uses)</b>	No
<b>Environmental issues (e.g. Tree Presentation Orders; SSSIs)</b>	No
<b>Flood Risk</b>	No
<b>Topography affecting site (land levels, slopes, ground conditions)</b>	No
<b>Utility Services (access to mains electricity, gas, water, drainage ect.)</b>	No
<b>Legal issues (For example, restrictive covenants or ownership titles affecting the site)</b>	No
<b>Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?</b>	Yes
<b>Other constraints affecting the site</b>	Yes - (If yes, please specify)

The site is situated within the Metropolitan Green Belt. However, it makes very limited to no contribution the application site makes toward the purposes of including land within the Green Belt, together with the localized impacts on openness of the Green Belt as demonstrated by supporting evidence for an application submitted for this site (now due to be heard at an Inquiry, please see below). This includes the Landscape and Visual Statement and Planning Statement which affirm that this site makes no contribution at all to the purposes identified under paragraph 134 (a), (b) and (d), and only makes a limited contribution to the purposes identified under 134(c) due to the self-contained nature of this site and its immediate context, and under 134(e) due to the very clear lack of previously developed land and brownfield sites available for (re)development and exceptional circumstances identified by the Council to met its very considerable need for housing under the previous emerging Plan wherein 524ha of Green Belt was proposed to be released - all of which was greenfield land.

Nonetheless, one of the significant failings of that now withdrawn plan was the assessment of Green Belt parcels and their contribution to the Green Belt as set out in ED40 by the examining Inspectors. Please see relevant extracts of ED40 below:

\* Para. 40: "In light of the large number of homes that would need to be accommodated, the Council decided that only strategic scale Green Belt sites would be taken forward in the Plan. The advantages of strategic scale sites over smaller ones was an explicit evaluative choice made by the Council."

\* Para. 41: "In looking at Green Belt releases we have concerns about the narrow focus that has been placed on only strategic sites. This has ruled out a number of sites that have already been found to impact least on the purposes of the Green Belt. It may well also have ruled out other nonstrategic sites with limited significant impacts on the Green Belt which may have arisen from a finer grained Green Belt Review."

\* Para. 44: "We accept that large scale urban extensions would provide significant amounts of new infrastructure which both the new and already established communities would benefit from. On the other hand, a range of sites including smaller sites could also provide benefits. For example, they could be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately."

\* Para. 45: "Overall, although previously recognised as a source of housing to be identified at some stage, smaller sites have been disregarded as part of the plan making process. It is our view that this approach has ruled out an important potential source of housing that may have been found to have a lesser impact on the purposes of the Green Belt than the sites selected without sufficient justification." This application site represents a suitably sized parcel of Green Belt land capable of delivering housing quickly (within 1-5 years) following the grant of planning permission which would make significant contribution to alleviating the housing need early on in the plan period and cannot be understated.

## Planning Status

Other

### Please include details of the above choice below (for example planning reference numbers and site history)

A cross-boundary planning application was submitted to St. Albans (5/2020/1992) and Welwyn Hatfield Councils (6/2020/2248/OUTLINE) in September 2020, with this being non-determined by St. Albans prior to the statutory deadline and refused by Welwyn Hatfield in December 2020. An appeal was lodged in the same month, and an Inquiry (APP/C1950/W/20/3265926) is scheduled to commence 27 April 2021.

### Other comments

As set out above, the site is located within the MGB but makes little to no contribution to Green Belt purposes. Given the need to consider smaller to medium-sized sites to deliver housing within the District quickly, due consideration should be given to the application site which has no other identified constraints to development.

The site is supported by a number of technical documents which sets this out in clear detail on relevant matters such as landscape, ecology, arboriculture, archaeology, heritage, highways, flood risk, drainage. These documents can be found under the planning application submitted to the Council in September 2020, with further documents provided to support the site through the appeals process and include:

- Site Location Plan (Dwg. no. 17981 1002);
- Land use Parameters Plan (Dwg no. 17981 1004);
- Illustrative Site Layout Plan (Dwg. no. 17981 1005; Not for approval);
- Landscape Strategy Plan (Illustrative and not for approval)
- Access Plan (Dwg. no. 18770-FELL-5-500 A);
- Housing Land Supply Statement;
- Affordable Housing Statement;
- Preliminary Ecological Appraisal;
- Agricultural Land Classification Report;
- Archaeological Assessment & Heritage Statement;
- Design & Access Statement;
- Landscape & Visual Impact Assessment;
- Noise Assessment;
- Tree Survey & Arboricultural Impact Assessment;
- Transport Assessment and Travel Plan;
- Utilities & Foul Assessment;
- Flood Risk Assessment & Surface Water Drainage Strategy; and
- Site Investigation Report

Nonetheless, key technical matters are summarised below, and it should be noted the majority of these are of a technical nature with some having been resolved through the appeals process:

\*Design: The design of the scheme has undergone an iterative process to arrive at a scale, form and density suitable for the proposed location and is in keeping with the context of the local character and appearance. Thus, accounting for the character of the settlement, together with the surrounding layout

and pattern of development, the scheme has been designed to front onto the eastern and southern boundaries and the building line set back to create a green corridor. This green corridor has been introduced to accommodate a new footpath link between Bullens Green Lane and Fellowes Lane and also a landscape buffer to help create a soft edge to the development, marking the transition from settlement to countryside beyond.

A sizeable area of open space has been indicated in the northwest corner of the site to provide a significant separation between the new built form and the grade II listed, no. 68 Roestock Lane, in order to sensitively minimize any impact on its setting. Additionally, the illustrative layout demonstrates the plentiful amount of informal, open space onsite. The proposed site immediately adjoins Roestock Park Recreation Ground which itself also provides plentiful open space, together with playing space for which the applicant would make the full and necessary contribution to upgrade in line with the generated demand of this development. Thus, the illustrative site layout indicates how the proposed development will provide a high-quality residential environment with landscaping, good amenity space levels and sufficient resident and visitor parking.

\*Highways: Vehicular access can be provided into the site to be taken from a newly proposed priority T-junction at Bullens Green Lane as per the proposed site access plan (ref: 18770-FELL-5-500). The existing hedge at the proposed junction location on-site is to be replaced with planting behind the junction visibility splays. This newly proposed access will see the incorporation of a new footway with street lighting at the junction connecting to the existing along Bullens Green Lane, which will continue onward to tie into the existing public rights of way network on-site that are to be retained and extended. A new "green" route is proposed to run from Bullens Green Lane at the north eastern corner of the site running adjacent to the existing and new boundary planting along the eastern and southern boundaries to the sites south western corner providing a pleasant walking route around the site's perimeter. The proposed level of housing would induce a level of trip generation not considered to be significantly adverse on the highway network.

\*Highways (cont'd): A pedestrian access is proposed to be taken from Fellowes Lane which would provide a safe and direct link to methods of sustainable transport within and beyond Colney Heath. This will be facilitated by way of a crossing on Fellowes Lane and tactile paving. A Road Safety Audit has been produced to demonstrate the suitability of this pedestrian access and concludes there need not be any fundamental changes to the proposed access to make it suitable for its purpose. In terms of accessibility, the Transport Assessment and Green Travel Plan also set out details of the services and facilities that are conveniently and safely accessible by foot, bicycle or bus from the site and in doing so, demonstrating that this is a sustainable location for new housing. The nearest bus stop to the site is located approximately 400m from the site on Hall Gardens Road which equates to a short 5-minute walk and is therefore easily accessible for any future residents. The bus stop serves the Routes 200, 230, 305 and 312 which facilitate access to Essendon, Brookmans Park, London Colney, Welwyn Garden City, St. Albans, Potters Bar, Sandridge and Hatfield. The TA details a number of these destinations together with journey times and service frequency, All are noted to be no more than 30-minutes by bus, with services operating throughout the week for users

\*Landscape: A Landscape and Visual Assessment (LVA) has been carried out by FPCR Environmental and Design Ltd to support the site. The LVA notes that the completed scheme is likely to result in a range of landscape effects at different scales. The nature of the immediate landscape, with a high degree of enclosure by existing built development and woodland, limits the effect on character and reduces the extent of change on the wider landscape character area. There would be overall a minor landscape effect in this context. The impact on the character of the immediately surrounding area would be limited as the existing settlement and tree lines contain the site to a high degree and minimise the effect on the wider area. The site and its immediate context has been assessed as having a medium sensitivity to change, and the scheme would result in a medium magnitude of landscape change on the area. Overall, this would lead to a Moderate landscape effect at the year of completion. Over time the green infrastructure would establish, including strengthening the tree belts along Bullens Green Lane and Fellowes Lane, and this would further reduce the landscape effects, leading to a Moderate/Minor landscape effect on the site and its immediate context.

\*Ecology & Arboriculture: A Phase 1 Habitat Survey was undertaken by FPCR Environmental and Design Ltd to support this site, the results of which are produced in a Preliminary Ecological Appraisal (PEA). The application is also further supported by an Arboricultural Assessment (AA), also produced by FPCR. The established vegetation is noted as being restricted to general narrow margins of poor semi-improved grassland associated with the boundary features. A total of seven hedgerows are identified within the site and from sections of the northern, eastern and southern boundaries. All of the hedgerows bar on are native species dominated and are unmanaged in nature exhibiting tall outgrown

structures. With regards to wildlife, there was no evidence of badgers on site or nearby; is of an unsuitable habitat to host common reptile species; is of little interest to invertebrates due to its use as farmed land.

\*Ecology & Arboriculture (cont'd): The PEA additionally makes a number of recommendations to maximise the biodiversity value of the site and contribute to measurable biodiversity gains. These include sowing the areas of informal green space with wildflower grassland mix appropriate to the local area; existing gaps in the boundary hedgerows to be replanted with native species, and attenuation ponds designed with consideration to their value to local wildlife. It has been agreed with the Council via the appeals process that net gains to biodiversity can be achieved by way of offsite contributions and is not a barrier to securing development at this site in ecological terms.

Archaeology & Heritage: An Archaeology and Heritage Assessment (AHA) has been produced by The Environmental Dimension Partnership (EDP) to support this site. The AHA noted that the site area does not contain any designated heritage assets, and that only one designated heritage asset within the site's wider surroundings would be affected through the change to its setting. That is the Grade II listed No. 68 Roestock Lane that adjoins the site's northwestern boundary and is orientated to east-west to face north away from the site. The Council has confirmed that the proposal of housing at this location would incur a less than substantial harm on the listed building as part of the application that was submitted. Trial trenching was undertaken on-site which has confirmed the site's archaeological potential to not be a constraint to development, also.

\*Flood Risk & Drainage: This site lies within Flood Zone 1 on the Environment Agency's Indicative Flood Maps and therefore has an annual probability of flooding of less than 1 in 1,000. Notwithstanding this Woods Hardwick Infrastructure LLP have prepared a Flood Risk Assessment (FRA) on the basis that the site has an area greater than 1 ha. The FRA demonstrates that the site will not be at risk of flooding and the proposed development will not exacerbate the risk of flooding elsewhere within the vicinity of the site. The FRA also includes a Surface Water Drainage Strategy that identifies a suitable sustainable strategy for the disposal of surface water from the developed site. It is proposed to discharged surface water runoff from the site to the existing Thames Water public sewer located in Bullens Green lane. Thames Water have already confirmed acceptance of any such connection at a maximum rate of 9.3l/s. 6.77 In any event, the proposed surface water network is to be designed and tested to ensure flows generated from the site will not exceed a 1 in 100 year plus 40% climate change rainfall event. A suitable foul sewer network to discharge the residential development will be designed in accordance with Thames Water's adoptable standards, providing a direct point of connection between the site and the agreed Thames Water foul outfall.

\*Summary: Evidently, the site has been assessed on a number of technical matters and deemed to be suitable to accommodate development in this specific location. Details of all the above can be provided upon requested, but has nonetheless already been submitted to the Council as part of the application and ongoing appeal at this site. It is understood the most significant constraint to development at this site, therefore, would be the inclusion of land within the MGB however a granular assessment of sites and their contribution to GB purposes undertaken by the Council will demonstrate the site's suitability for release in this respect, also. Therefore, there is no reason why this site cannot or should not come forward as an allocation.