

**St Albans City and District Local Plan
Examination**

**Matter 4 –
The Metropolitan Green Belt (Policy S3)**

**Responses on behalf of
M Scott Properties Limited**

December 2019

Turley

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Client

M Scott Properties Ltd

Our reference

SCOC3009

11 December 2019

1. Introduction

- 1.1 This Statement has been prepared by Turley on behalf of M Scott Properties Ltd (herein referred to as Scott Properties), pursuant to Matter 4 (The Metropolitan Green Belt (Policy S3) of the St Albans Local Plan Examination.
- 1.2 Scott Properties are promoting land to the west of Watling Street, Park Street, for the delivery of residential development, including a minimum of 50% affordable housing to be delivered within the first 5 years of the Plan. Scott Properties has submitted written representations in connection with the promotion of this sustainable site to all previous consultation stages of the emerging Local Plan.
- 1.3 The primary areas of concern in relation to Matter 4 relate to the following issues:
- Methodology applied to the Green Belt Review is not soundly based. Limited assessment of smaller individual potential development sites adjacent to the urban areas;
 - SACDC's decision to exclude all sites smaller than 14 ha / 500 dwellings is completely unjustified and fails to recognise the wider cumulative benefits which can accrue from smaller sites;
 - SACDC's site evaluation process, informed by the conclusions of the 2013 Green Belt Review is seriously flawed. SACDC's reasoning given for not carrying forward red rated sites for detailed assessment in the same way as the green and amber sites is wholly unjustified.
 - The findings of the Green Belt Review and Sustainability Appraisal do not support SACDC's belief that 'exceptional circumstances' exist in order to justify the release of existing Green Belt areas within the Draft Local Plan.
- 1.4 The remainder of this Statement responds directly to the questions raised by the Inspector. Scott Properties and its professional advisors have also requested to participate in the relevant Matter 4 Hearing Session to articulate the issues within this Statement.

2. Responses to the Green Belt Review

Q1) What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? Is the Council's approach to the Green Belt set out in its response to the Inspector's Initial Question 16 and letter of the 2 July 2019 (Green Belt topic paper) robust and in line with national guidance?

- 2.1 The basis of any Green Belt review should be to assess the degree boundaries would impact on the five aims and purposes set out at paragraph 134 of the NPPF.
- 2.2 The 2013 Green Belt Review assesses the purposes against large parcels of land. However, whilst the assessment identified 8 strategic sub-areas and smaller scale sub-areas, the scope of the 2013 GBR was not an exhaustive assessment of smaller individual potential development sites adjacent to the urban areas.
- 2.3 The 2013 GBR was prepared by SKM for St Albans City and District Council (SACDC) together with Dacorum Borough Council and Welwyn Hatfield Borough Council. The Local Plan Inspector examining the Welwyn and Hatfield Local Plan raised concerns regarding the development strategy put forward in the plan to be sound, in part because there was insufficient justification for the failure to identify sufficient developable sites within the Green Belt. The Inspector felt that the lack of justification was due in large part to the fact that:

"...the phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas. It goes without saying that a finer grained approach would better reveal the variations in how land performs against the purposes of the Green Belt. Such an approach is also more likely to reveal opportunities as well as localised constraints, both of which might reasonably be considered further".

- 2.4 SACDC only commissioned a more detailed Green Belt Assessment for 8 of the Broad Locations. As set out in our response to Matter 3, SACDC's decision to exclude all sites smaller than 14 ha / 500 dwellings was an evaluative choice made on the basis that such sites would not offer infrastructure or community benefits in the same way as the broad locations. This highly subjective judgement is based on the erroneous perception that only this minimum threshold of development can provide significant new infrastructure along with policy compliant levels of affordable housing.
- 2.5 There is however no evidential basis for this broad judgement, which fails to recognise the wider cumulative benefits which can accrue from smaller sites. Such sites can deliver market and affordable homes much earlier in the plan period thereby underpinning and complementing the long-term delivery strategy proposed at the broad locations. In the absence of a comprehensive GBR looking at a finer grain of sites, SACDC's development strategy and in particular the need for a stepped trajectory is completely **unjustified** and **does not meet the test of soundness**.

Q2 Part 1) How have the conclusions of the Green Belt Review informed the Local Plan?

- 2.6 In order for the Local Plan to be found sound, it is necessary for SACDC to demonstrate that exceptional circumstances exist which justify the release of Green Belt for new development. As such, the Development Strategy must be informed by a proportionate up-to-date evidence base, which includes a comprehensive Green Belt Review (GBR).
- 2.7 SACDC's approach to the site evaluation process is set out at section 4.4.2 of the St Albans SA Report (2018). However, as identified at paragraph 2.4 above, the fundamental flaw with SACDC's approach to site selection is the automatic exclusion of all sites smaller than 14 ha / 500 dwellings.
- 2.8 This approach is also inconsistent with national planning policy and runs counter to the recent judgement of the Secretary of State, in lifting a temporary Holding Direction in October 2018 to allow East Hertfordshire District Council to adopt its new District Plan. The East Hertfordshire Plan had proposed the release of a broad range of housing sites from the Green Belt, including a new settlement at Gilston and major urban extensions at Bishops Stortford, Ware and Welwyn Garden City. However East Hertfordshire also proposed to release a range of substantially smaller Green Belt allocations at Hertford and Bishops Stortford, for as few as 50 dwellings.
- 2.9 East Hertfordshire additionally proposed the release of a number of intermediate sites, such as an amalgam of five Green Belt allocations clustered around the County Town of Hertford, totalling 950 dwellings, which all fell considerably below the minimum scale thresholds currently set by SACDC. In the majority of cases, the proposed allocations were located within larger parcels that were concluded to be of low or very low suitability as an area of search for development. Following six weeks of consideration by the Secretary of State in October 2018, he allowed the Plan to proceed to adoption on the basis that it was fully compliant with the Framework. The Plan was subsequently adopted later in October 2018 and was not legally challenged.
- 2.10 Whilst the GBR formed only one aspect of the overall evidence base that was prepared by East Hertfordshire in order to inform the District Plan. When considered as a whole, the Secretary of State shared the view held by East Hertfordshire that these locations represented highly sustainable locations for development. It is particularly notable that East Hertfordshire is not an authority which is completely constrained by Green Belt and theoretically has non-Green Belt land available to meet its development needs. However, in this case, the Sustainability Appraisal objectively considered the release of Green Belt in the most sustainable locations, regardless of scale against a range of reasonable alternatives and this approach was endorsed by the Secretary of State.
- 2.11 The conclusion to be drawn is that there is no automatic correlation between the scale of Green Belt released and the weighting of the exceptional circumstances which are used to justify that release. In short, the above example demonstrates that every site must be judged on its merits, based on its contribution to the five purposes of the Green Belt and its relative sustainability criteria.

- 2.12 Notwithstanding our objection above and the use of such an arbitrary scale criteria as the basis for identifying sites for evaluation, Scott Properties also have serious concerns with regards to the manner in which SACDC have applied the findings of the GBR to the seventy sites identified as being able to accommodate a minimum of 500 dwellings / 14 hectares of developable land.
- 2.13 At stage 1 of the site evaluation process undertaken by SACDC, a Green Belt Review evaluation was undertaken for all seventy sites which were rated as 'higher impact', 'medium impact' or 'lower impact', set out as Red, Amber, and Green (RAG) in relation to Green Belt purposes. Stage 1 of the 2018 site evaluation process took account of the conclusions from the 2013 Green Belt Review (GBR), undertaken by SKM. To continue to Stage 2 of the evaluation process the site must be identified as having a lower or medium impact (green or amber), with all red rated sites (higher impact) not being progressed any further.
- 2.14 Stage 1 of the 2018 site evaluations included the conclusions of the 2013 GBR for the relevant Green Belt parcel. Of the seventy sites evaluated, eight were strategic sub-areas shortlisted in the 2013 GBR and scored a green rating in the Council's 2018 site evaluations. In arriving at this judgement, the Council could rely on the findings of a detailed 2014 GBR also undertaken by SKM.
- 2.15 For the sites that were rated amber or green and had not been shortlisted as a sub area in 2013, a brief assessment of the sites impact on the Green Belt was undertaken by Council Officers.
- 2.16 The Park Street Garden Village (PSGV) site evaluation undertaken by the Council is attached at **Appendix 1** to this Statement. The PSGV evaluation contains the original assessment undertaken in the 2013 GBR which concluded that the overall contribution of GB30 towards Green Belt purposes is:
- To check unrestricted sprawl of large built-up area – limited or no
 - To prevent neighbouring towns from merging – partial
 - To assist in safeguarding the countryside from encroachment – significant
 - To preserve the setting and special character of historic towns – significant
 - To maintain existing settlement pattern – significant
- 2.17 A new assessment of the PSGV site was then undertaken by the Council:
- "Assessment has been undertaken on the basis of a limited development area south of the A414 informed by the parcel assessment above".*
- 2.18 The Council concludes that:
- "The wider parcel performs a range of Green Belt functions and there would be some impacts. A partial development of the parcel only below the A414 could however be undertaken in a way that reduces such impacts. Exact boundaries will be set out through the Local Plan/masterplanning process"*

- 2.19 Despite SKM concluding in the 2013 GBR that the wider parcel GB30 made a significant contribution to three out of the five green belt purposes, the Council in their site evaluation awarded the PSGV site an amber rating. Therefore, the site progressed to Stage 2 of the evaluation process.
- 2.20 'Land West of Park Street' was also considered by the Council as part of the 2018 site evaluation process. The Council's site evaluations are provided at **Appendix 2**. This Site is an amalgamation of six development parcels, including land to the west of Watling Street promoted by Scott Properties, and was assessed under two different identical parcels. Based on the 2013 GBR the Site falls in parcel GB28. The Review concluded that the overall contribution of GB28 towards Green Belt purposes is:
- To check the unrestricted sprawl of large built-up areas – **limited or no**
 - To prevent neighbouring towns from merging – **partial**
 - To assist in safeguarding the countryside from encroachment – **partial**
 - To preserve the setting and special character of historic towns – **limited or no**
 - To maintain existing settlement pattern – **significant**
- 2.21 In comparison to Parcel GB30, which includes the PSGV site, Parcel GB28 scores either 'Limited or No' and 'Partial' against all of the actual NPPF criteria. The parcel only scores highly against an additional criterion added by the Local Planning Authority. Despite scoring lower in the 2013 GBR, 'Land West of Park Street' was awarded a red rating by the Council and not taken forward for further consideration.
- 2.22 Similarly to the approach taken on other red rated sites, there is no correlation between the RAG rating awarded to 'Land West of Park Street' and the number of significant impacts identified in the 2013 GBR. In our judgement, the reasoning given for not carrying forward this Site for a detailed assessment in the same way as the green and amber sites is wholly unjustified.
- 2.23 Rather than undertake a comprehensive Green Belt Review to inform the Draft Local Plan, it is clear that SACDC have 'cherry picked' conclusions from the 2013 GBR to validate a largely pre-determined preferred Development Strategy. As a result sustainable sites, adjacent to the urban areas and close to public transport opportunities, have been discounted without sufficient justification when reasonably they should have been considered further as part of a more detailed Green Belt Review.
- 2.24 As stated previously Scott Properties are promoting land to the west of Watling Street, Park Street for residential development and commissioned Lockhart Garratt Ltd (LG) to undertake a Green Belt Appraisal. A copy of the LG Report is provided at **Appendix 3**. As demonstrated by the LG Appraisal, the Site promoted by Scott Properties can be released from the Green Belt for development purposes without substantial harm to the remaining Green Belt areas, on the basis that the Site is well contained and therefore separated from the surrounding countryside. The proposal Site also offers suitable opportunities to make further positive enhancements to the local landscape

context, including the incorporation of new open spaces and generous landscape buffers, whilst also delivering a minimum of 50% affordable housing for local people.

- 2.25 The 2013 GBR was undertaken at a strategic level and did not consider a finer grain of sites. As such the conclusions of the 2013 GBR should not have been used to determine the extent of the potential harm to the purposes of the Green Belt caused by development within those large parcels. As demonstrated by the findings of the LG Green Belt Appraisal relating to land west of Watling Street, there are sites, smaller than 14 ha / 500 dwellings, that are worth further consideration.
- 2.26 In the absence of a more detailed Green Belt assessment, the Council's development strategy and in particular the proposed release from the Green Belt and allocation of the amber rated sites (South East Hemel Hempstead, North Hemel Hempstead and Park Street Garden Village), which were not assessed as part of the phase 2 2014 GBR, is **completely unjustified**.

Q2 Part 2) Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development, and prioritise sites which are previously developed and/or well served by public transport? Where is this evident?

- 2.27 As stated above at paragraph 2.3 the Green Belt Review forms one aspect of the overall evidence base. The Sustainability Appraisal should also play a vital role and provide the necessary evidence to demonstrate that the sites proposed for release from the Green Belt promote sustainable patterns of development, and prioritise locations which are previously developed and/or well served by public transport.
- 2.28 As set out in our response to Matter 1, the spatial strategy is fundamentally flawed as it is predicated upon a Sustainability Appraisal (SA) which does not objectively appraise the potential impacts of the Plan, the proposed allocations and all other reasonable alternatives to the same level of scrutiny to properly identify their contribution to sustainable development. The SA is the primary mechanism for assessing and enhancing the sustainability performance of policies and allocations within a draft plan to ensure that new development is directed to the most sustainable locations within the local authority area.
- 2.29 However, by reason of the arbitrary exclusion from consideration of all small to medium Green Belt sites in sustainable locations, irrespective of their contribution to sustainable development, the SA is materially unsound.
- 2.30 The SA Report (2018) does not include for a genuine assessment of suitable alternatives to inform the spatial strategy. SACDC's decision to only evaluate sites that are above 14 ha /500 dwellings, on the basis of the Green Belt exceptional circumstances policy test, is incorrect and has prejudiced the SA process. The distribution of growth to settlements such as Park Street, with excellent access to public transport opportunities, should have been considered and properly assessed.
- 2.31 Paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, '*plans should give first consideration to land which has been previously-developed and/or is well-served by public transport*'. The SA Report (2018) is materially deficient and does not provide reasoned evidence to

demonstrate that the Broad Locations identified in the Draft Local Plan, will promote sustainable patterns of development, when assessed against a range of reasonable alternatives.

Q7) Do the exceptional circumstances, as required by paragraph 136 of the Framework, exist to justify the plan's proposed removal of land from the Green Belt?

- 2.32 The NPPF does not provide a strict definition on what constitutes 'exceptional circumstances'. However, paragraph 137 of the NPPF sets out a number of matters that should be identified and dealt with in order to ascertain whether 'exceptional circumstances' exist to justify releasing land from the Green Belt.
- 2.33 To demonstrate that 'exceptional circumstances' exist the LPA have to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This requires a thorough investigation of the capacity of the existing urban areas (suitable brownfield sites and underutilised land) and whether this has been maximised having regard to optimising densities. Subtracting this from the relevant housing requirement figure leaves the amount of development that cannot be accommodated within the urban areas. This process also needs to be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need.
- 2.34 Outside of the defined urban areas all of SACDC is designated as Green Belt. There are some brownfield opportunities but these are highly limited and cumulatively are not capable of meeting the District's housing requirements. The Council could have sought assistance from neighbouring authorities to help meet a proportion of the identified housing need. However, these authorities are equally constrained by Green Belt. Therefore, in order to meet the significant housing needs that exist in St Albans, Green Belt release is required.
- 2.35 Where it has been concluded that it is necessary to release Green Belt land for development Stage 2 then determines which sites would best meet the identified need having regard to Green Belt harm and other relevant considerations including whether they are suitably located and developable. All these factors are then considered to reach a conclusion as to whether 'exceptional circumstances' exist for each of the individual Green Belt releases.
- 2.36 Only 8 of the Broad Locations (East Hemel Hempstead (North), East Hemel Hempstead (South), Land at Chiswell Green, North East Harpenden, North West Harpenden, North St Albans and East St Albans) were assessed as part of the phase 2 2014 GBR. However, 3 of the Broad Locations (South East Hemel Hempstead, North Hemel Hempstead and Park Street Garden Village) were not assessed as part of the detailed 2014 GBR.
- 2.37 SACDC's decision to propose the release of the 3 Broad Locations identified above and discount the remaining sites submitted through the Call for Site's process was on the basis of the conclusions of the 2013 GBR. As stated previously the 2013 GBR was undertaken at a strategic level, considering the potential for harm across large parcels before identifying sub-areas for further assessment. As advised by the Inspector examining the Welwyn and Hatfield Local Plan, a phase 2 GBR should then be

undertaken, looking at a finer grain of sites, to better reveal the variations in how land performs against the purposes of the Green Belt.

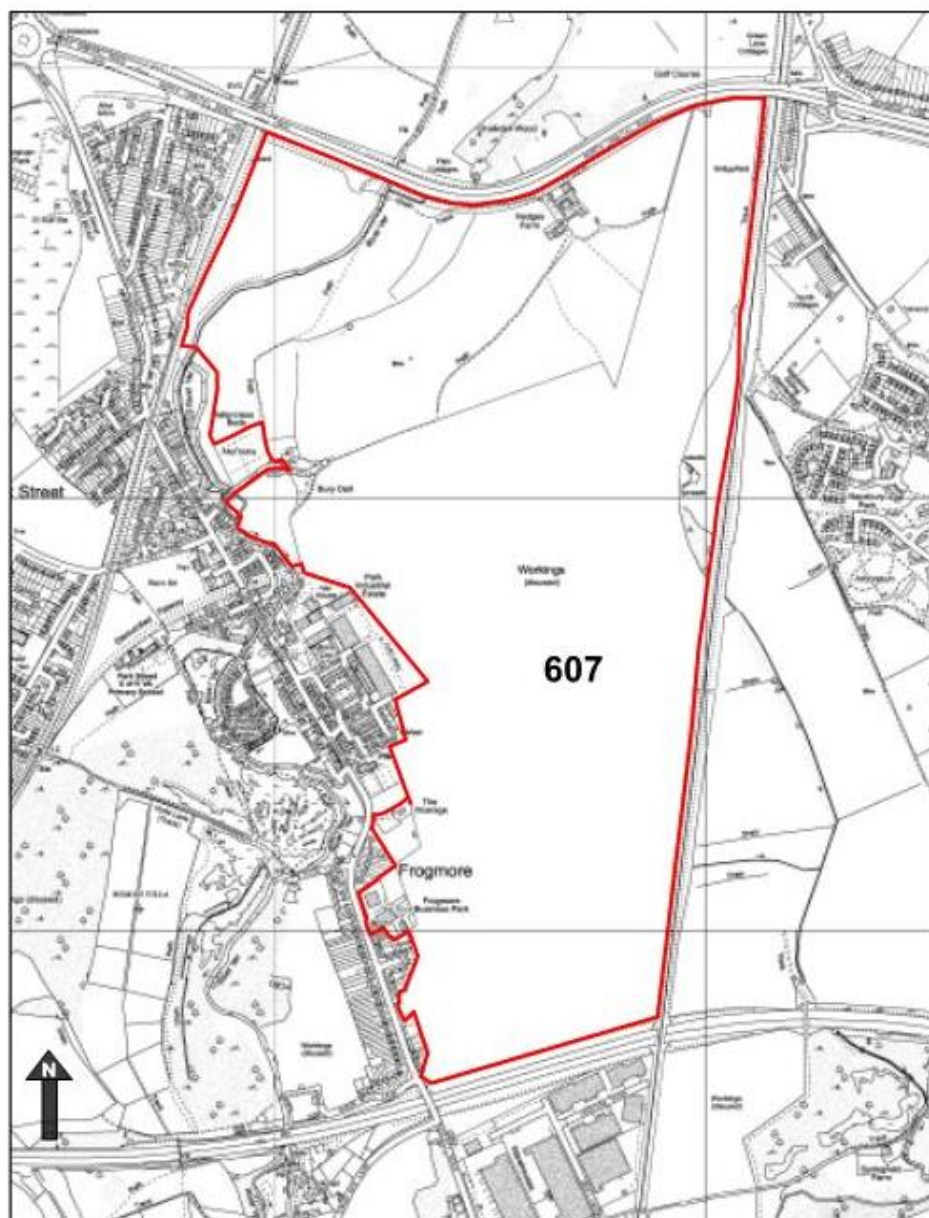
- 2.38 SACDC has commissioned no such evidence to justify the release of South East Hemel Hempstead, North Hemel Hempstead and Park Street Garden Village. Furthermore, the findings of the 2013 GBR show that a number of the potential sites including 'Land West of Park Street', which were discounted by SACDC as part of the site evaluation process, are located within GB parcels that in comparison to the aforementioned Broad Locations (South East Hemel Hempstead, North Hemel Hempstead and Park Street Garden Village) make less of a contribution to the five green belt purposes set out at paragraph 134 of the NPPF.
- 2.39 In conclusion the current Development Strategy, including the release of Green Belt in the Broad Locations ***is not justified*** and therefore ***unsound***.

Appendix 1: SACDC's Site Evaluation - Park Street Garden Village

Site – inc.
Area (Ha) and
Indicative
Capacity
[dwellings]

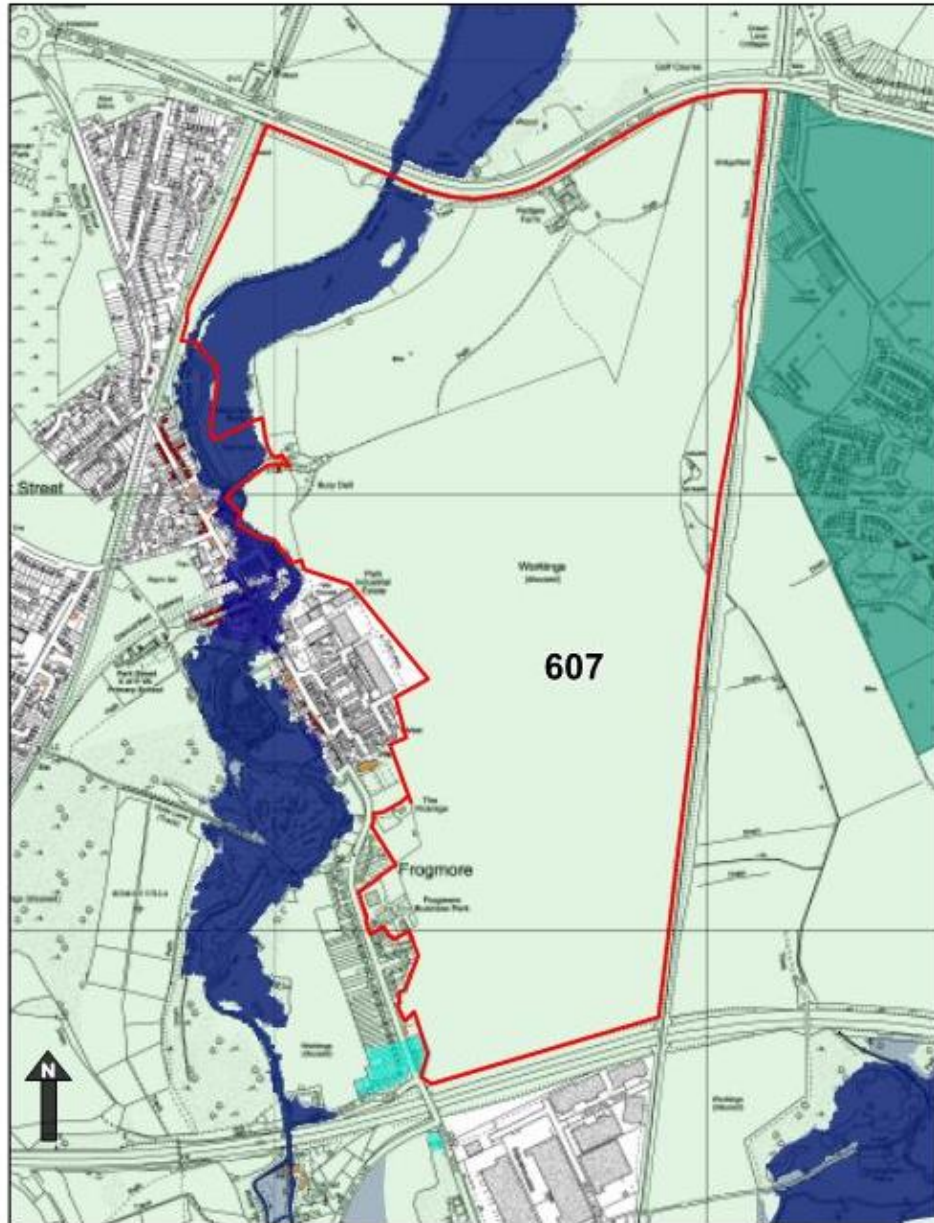
Former Radlett Aerodrome
PS-607 (combines 122, 189, 431, 118, 262, 240 and 512)
186.1ha
40 dph on 60% of site – 4469 dwellings
Submitted number of dwellings – 2000 dwellings
SADC estimate – 2,300 dwellings

Diagram of
site



Former Radlett Aerodrome (PS-607)

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Former Radlett Aerodrome (PS-607)

Constraints Key

■ Listed Buildings	■ Historic Parks	■ Green Belt	■ Flood Zone 2
■ Locally Listed Buildings	■ SSSI	■ AQMA	■ Flood Zone 3
■ Ancient Monuments	■ Ancient Woodlands	SADC District Boundary	

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<p>1. Green Belt Review evaluation (RAG)</p>	<p>An independent Green Belt Review was carried out in 2013. The site falls in parcel GB30. The Review concludes</p> <p><i>“ The overall contribution of GB30 towards Green Belt purposes is:</i></p> <ul style="list-style-type: none"> <i>• To check the unrestricted sprawl of large built-up areas – limited or no</i> <i>• To prevent neighbouring towns from merging – partial</i> <i>• To assist in safeguarding the countryside from encroachment - significant</i> <i>• To preserve the setting and special character of historic towns – significant</i> <i>• To maintain existing settlement pattern – significant</i> <p><i>The parcel does not fully separate neighbouring 1st tier settlements however it contributes (with GB26, 27, 28 & 29) to the strategic gap between St Albans and Watford (Abbots Langley) to the south of the study area. This gap is 4.8km and contains the settlements of Chiswell Green, How Wood, Bricket Wood, Park Street / Frogmore and Radlett Road. Therefore any reduction in the gap would have a limited impact on the overall separation of 1 st tier settlements in physical or visual terms but would have a greater impact on the separation of 2nd tier settlements and local levels of visual openness.</i></p> <p><i>The parcel displays some typical rural and countryside characteristics but also accommodates significant recreational land uses including Sopwell parkland and Verulam golf course in the north. Beyond this arable fields are bound by hedgerows with pasture frequently close to the watercourses. The parcel is also contains the well restored mineral workings (Radlett Airfield). The main urban influences are the M25 and A414 which dissect the site. Both are well concealed in the landscape, but highly audibly intrusive. Land to the north of Sopwell acts as a green wedge into St Albans. There is limited built development and settlement boundaries are generally strong meaning the urban fringe is well connected to the wider countryside. However there is ribbon development along the Radlett Road south of Park Street / Frogmore to Colney Street industrial park. The countryside landscape is generally open in character with limited tree and hedgerow cover.</i></p> <p><i>The parcel contains Sopwell Conservation area. Most significantly it also provides open and historic setting to the Cathedral and Abbey Church of St Alban providing views to and from the countryside.</i></p> <p><i>The parcel provides the primary local gap between St Albans and Park Street / Frogmore (2nd). The narrow gap is 0.4km and contains the A414 which is well integrated into the landscape. Landscape features and planting enhance the perception of the gap and lessen the urban influence arising from the proximity of settlements and the road. Any reduction would be likely to compromise the separation of settlements in physical and visual terms, and overall visual openness. The gap from Park Street / Frogmore (2nd) to Radlett Road (3rd) Colney Street industrial area is very limited due to ribbon development along the Radlett Road.”</i></p> <p>Assessment has been undertaken on the basis of a limited development area south of the A414, informed by the parcel assessment above.</p> <p>The wider parcel performs a range of Green Belt functions and there would be some impacts. A partial development of the parcel only below the A414 could however be undertaken in a way that reduces such impacts. Exact boundaries will be set out through the Local Plan/masterplanning process.</p> <p>The parcel contributes, together with GB26, 27, 28 and 29, to the strategic gap between St Albans and Watford, however the gap would remain at 4.8km and the development of the site would have a limited impact on the overall separation of these settlements.</p>
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	<p>The whole submitted site has strong physical boundaries by way of the A414 dual carriageway to the north, the Midland Mainline to the east, the M25 to the south and the existing built up area of Park Street to the west. These boundaries considerably assist in containing the Green Belt impact of any development within the site.</p> <p>AMBER</p> <p><u>Existing significant permission</u></p> <p>Outline planning permission was granted by the Secretary of State for a Strategic Rail Freight Interchange (SRFI) on 14/07/2014 (LPA reference 5/2009/0708). Three Reserved Matters applications have been submitted to the LPA and are awaiting determination.</p> <p>Exact boundaries will be set out through the Local Plan/masterplanning process. The footprint of any built development would likely be located in a broadly similar position to the built development proposed as part of the SRFI. The impact of 2,500 homes would likely have a broadly similar impact as the permitted 331,665 sq.m. of warehousing.</p> <p>It is recognised that the Secretary of State has determined that “the factors weighing in favour of the appeal include the need for SRFIs to serve London and the South East...the lack of more appropriate alternative locations for an SRFI in the north west sector which would cause less harm to the Green Belt...the local benefits of the proposals for a country park, improvements to footpaths and bridleways and the Park Street and Frogmore bypass”. The Secretary of State considered “that these considerations, taken together, clearly outweigh the harm to the Green Belt and the other harms he has identified including the harm in relation to landscape and ecology and amount to very special circumstances.”</p> <p>The site is however a strategic scale site that has (very largely) been put forward as part of a Call for Sites. For the reasons above there is no change to the rating of the site.</p> <p>AMBER</p> <p>NB: The site assessed includes additional land not submitted as part of the HCC Former Radlett Airfield submission.</p>
2. Suitability (RAG)	<p>No known overriding constraints to development.</p> <p>GREEN</p>
3. Availability (RAG)	<p>No known overriding constraints to development in terms of land ownership, restrictive covenants etc.</p> <p>GREEN</p>
4. Unique contribution to improve public services and facilities (RAG)	<p>There are opportunities for improvements to public transport on the Abbey Line by way of more frequent commuter services. There are also opportunities for improvements by provision of park and rail. Together these improvements could have significant benefits in the wider area, including along the A414 corridor. There is additionally future potential for: a possible additional station on the Midland Mainline; a possible additional stop or improved links on the Abbey Line serving the BRE; and for possible direct services to Euston via Watford and/or links to a future Metropolitan Line extension in Watford. These have largely been identified in HCC's Local Transport Plan 4.</p>

	GREEN
5. Unique contribution to enhancing local high quality job opportunities (RAG)	<p>Within the standard range of providing a contribution to enhancing local high quality job opportunities.</p> <p>GREEN</p>
6. Unique contribution to other infrastructure provision or community (RAG)	<p>The site would contribute to infrastructure provision and provide community benefits by way of provision of a secondary school.</p> <p>GREEN</p>
7. Deliverable / Achievable (RAG)	<p>There is a reasonable prospect that the development is viable and deliverable.</p> <p>GREEN</p>
8. Overall Evaluation (RAG)	AMBER

Appendix 2: SACDC's Site Evaluation - Land West of Park Street and Park Street Sewage Works

Site – inc.
Area (Ha) and
Indicative
Capacity
[dwellings]

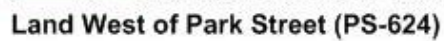
Land West of Park Street (combines 14, 46, 255, 543, 560 and 587)
PS-624
53.4ha
40 dph on 60% of site – 1280 dwellings

Diagram of
site



Land West of Park Street (PS-624)

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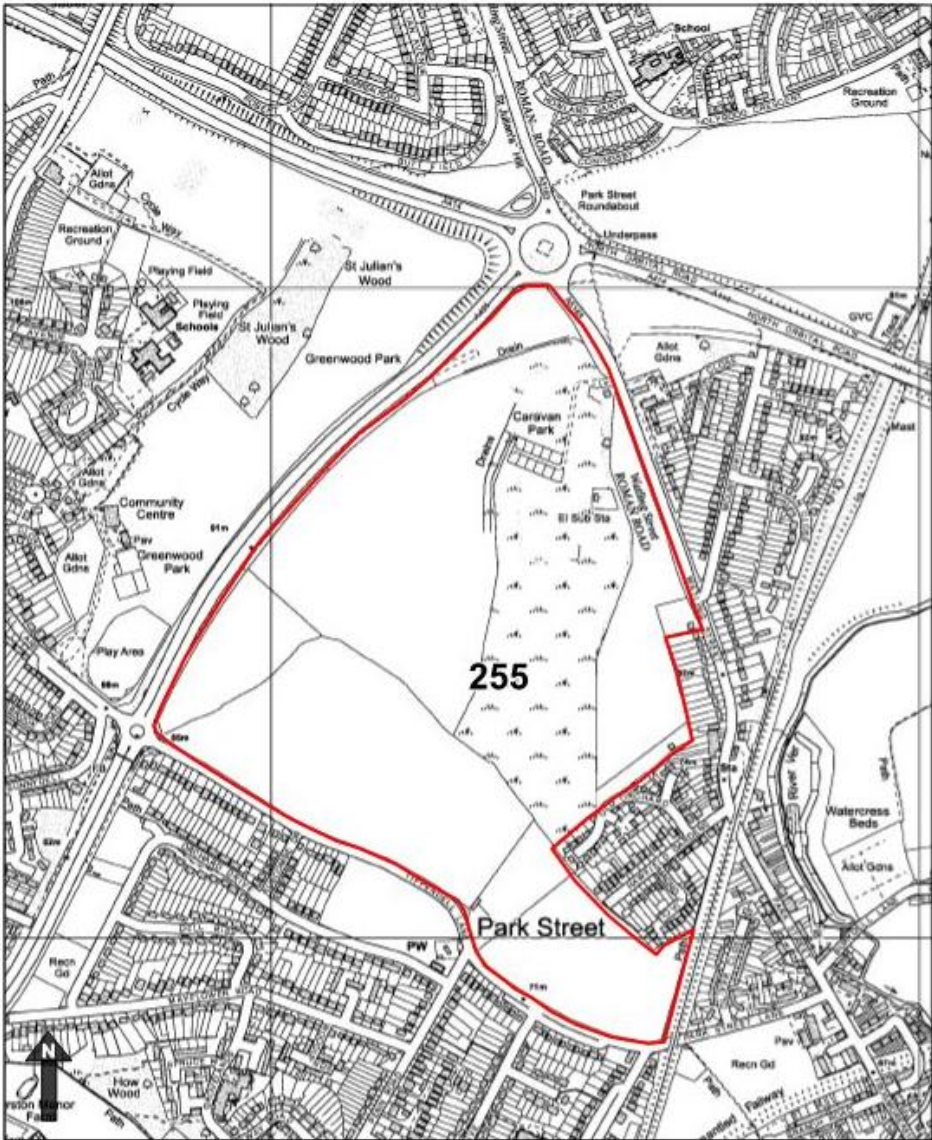

■ Listed Buildings
■ Locally Listed Buildings
■ Ancient Monuments

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<p>1. Green Belt Review evaluation (RAG)</p>	<p>An independent Green Belt Review was carried out in 2013. The site falls in parcel GB28. The Review concludes</p> <p><i>“The overall contribution of GB28 towards Green Belt purposes is:</i></p> <ul style="list-style-type: none"> <i>• To check the unrestricted sprawl of large built-up areas – limited or no</i> <i>• To prevent neighbouring towns from merging – partial</i> <i>• To assist in safeguarding the countryside from encroachment – partial</i> <i>• To preserve the setting and special character of historic towns – limited or no</i> <i>• To maintain existing settlement pattern – significant”</i> <p><i>“The parcel does not fully separate neighbouring 1st tier settlements however it contributes (with GB26, 27, 29 &) to the strategic gap between St Albans and Watford (Abbots Langley) to the south of the study area. This gap is 4.8km and contains the settlements of Chiswell Green, How Wood, Bricket Wood, Park Street / Frogmore and Radlett Road. Therefore any reduction in the gap would have a limited impact on the overall separation of 1st tier settlements in physical or visual terms but would have a significant impact on the separation between 1st and 2nd tier settlements and local levels of visual openness.”</i></p> <p><i>“The parcel displays some typical rural and countryside characteristics to the north in a mixture of arable fields bound by hedgerows and occasional hedgerow trees interspersed with some small blocks of woodland, whereas to the south pasture fields are enclosed with fencing. In spite of this, urban influences are strong through the proximity of settlement edges and A414 and A405 which run through the parcel. These are concealed by the general landscape and tree / hedgerow cover in some areas but are audibly intrusive. Settlement boundaries enclose the majority of the parcel reinforcing urban fringe characteristics. Levels of visual openness are variable and generally contained”.</i></p> <p><i>“The parcel provides primary local gaps between St Albans and Park Street / Frogmore (2nd) and How Wood (2nd). Gaps are 0.4km and 1.1km respectively. Both gaps are narrow, especially to Park Street / Frogmore. In spite of containing the A414/A405 these major roads are well integrated into the landscape and are concealed to provide a limited perception of the gap or settlements from the routes. The gaps are well-maintained and any reduction would be likely to compromise the separation of settlements in physical and visual terms, and overall visual openness.”</i></p> <p>In reviewing the boundary for this site and the reasonably likely form and layout of development it is considered that the overall rating is red. There is no reason to take a different view from that set out in the Green Belt Review 2013.</p> <p>RED</p>
<p>2. Suitability (RAG)</p>	
<p>3. Availability (RAG)</p>	

4. Unique contribution to improve public services and facilities (RAG)	
5. Unique contribution to enhancing local high quality job opportunities (RAG)	
6. Unique contribution to other infrastructure provision or community (RAG)	
7. Deliverable / Achievable (RAG)	
8. Overall Evaluation (RAG)	RED

<p>Site – inc. Area (Ha) and Indicative Capacity [dwellings]</p>	<p>Park Street Sewage Works (includes 14, 46 & 47) PS-255 53.3ha 40 dph on 60% of site – 1280 dwellings Submitted number of dwellings – Not given</p>
<p>Diagram of site</p>	 <p>Park Street Sewage Works (PS-255)</p> <p>© Crown copyright and database rights 2018 Ordnance Survey 100018953</p> 



Park Street Sewage Works (PS-255)

Constraints Key

■ Listed Buildings	■ Historic Parks	■ Green Belt	■ Flood Zone 2
■ Locally Listed Buildings	■ SSSI	■ AQMA	■ Flood Zone 3
■ Ancient Monuments	■ Ancient Woodlands	↘ SADC District Boundary	

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<p>1. Green Belt Review evaluation (RAG)</p>	<p>An independent Green Belt Review was carried out in 2013. The site falls in parcel GB28. The Review concludes</p> <p><i>“The overall contribution of GB28 towards Green Belt purposes is:</i></p> <ul style="list-style-type: none"> <i>• To check the unrestricted sprawl of large built-up areas – limited or no</i> <i>• To prevent neighbouring towns from merging – partial</i> <i>• To assist in safeguarding the countryside from encroachment – partial</i> <i>• To preserve the setting and special character of historic towns – limited or no</i> <i>• To maintain existing settlement pattern – significant”</i> <p><i>“The parcel does not fully separate neighbouring 1st tier settlements however it contributes (with GB26, 27, 29 &) to the strategic gap between St Albans and Watford (Abbots Langley) to the south of the study area. This gap is 4.8km and contains the settlements of Chiswell Green, How Wood, Bricket Wood, Park Street / Frogmore and Radlett Road. Therefore any reduction in the gap would have a limited impact on the overall separation of 1st tier settlements in physical or visual terms but would have a significant impact on the separation between 1st and 2nd tier settlements and local levels of visual openness.”</i></p> <p><i>“The parcel displays some typical rural and countryside characteristics to the north in a mixture of arable fields bound by hedgerows and occasional hedgerow trees interspersed with some small blocks of woodland, whereas to the south pasture fields are enclosed with fencing. In spite of this, urban influences are strong through the proximity of settlement edges and A414 and A405 which run through the parcel. These are concealed by the general landscape and tree / hedgerow cover in some areas but are audibly intrusive. Settlement boundaries enclose the majority of the parcel reinforcing urban fringe characteristics. Levels of visual openness are variable and generally contained.”</i></p> <p><i>“The parcel provides primary local gaps between St Albans and Park Street / Frogmore (2nd) and How Wood (2nd). Gaps are 0.4km and 1.1km respectively. Both gaps are narrow, especially to Park Street / Frogmore. In spite of containing the A414/A405 these major roads are well integrated into the landscape and are concealed to provide a limited perception of the gap or settlements from the routes. The gaps are well-maintained and any reduction would be likely to compromise the separation of settlements in physical and visual terms, and overall visual openness.”</i></p> <p>In reviewing the boundary for this site and the reasonably likely form and layout of development it is considered that the overall rating is red. There is no reason to take a different view from that set out in the Green Belt Review 2013.</p> <p>RED</p>
<p>2. Suitability (RAG)</p>	
<p>3. Availability (RAG)</p>	

4. Unique contribution to improve public services and facilities (RAG)	
5. Unique contribution to enhancing local high quality job opportunities (RAG)	
6. Unique contribution to other infrastructure provision or community (RAG)	
7. Deliverable / Achievable (RAG)	
8. Overall Evaluation (RAG)	RED

Appendix 3: Lockhart Garrett Green Belt Appraisal

Green Belt Appraisal

M Scott Properties Ltd

Land to west of Park Street, St Albans

Ref: 18-0603
Version: V1
Date: 21st June 2018



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INVESTORS
IN PEOPLE

Bronze

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Executive Summary

Lockhart Garratt Ltd was instructed by M Scott Properties Ltd to undertake an appraisal of the implications of the proposed release of land from the Metropolitan Green Belt to facilitate the proposed residential development on land to the west of Park Street, St Albans. The appraisal consisted of an independent review of the site's contribution to the five purposes of the Green Belt as set out in Paragraph 80 of the National Planning Policy Framework, as follows:

- Purpose 1: To check the unrestricted sprawl of urban areas;
- Purpose 2: To prevent neighbouring towns merging into one another;
- Purpose 3: To assist in safeguarding the countryside from encroachment;
- Purpose 4: To preserve the setting and special character of historic towns; and
- Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is the conclusion of this appraisal that the site exhibits a transitional sub-urban character as a result of its close proximity to the existing settlement edge.

The site is well contained within a narrow strip of pasture land, that is bound by the existing settlement edge to the south and east, the existing road infrastructure to the north, and the Watling Street Caravan Park to the west.

As a result, the site relates more positively to the existing settlement edge than the open countryside that lies to the west, beyond the line of mature trees and the caravan park.

The site is separated from a number of other nearby settlements, by the presence of the village of Park Street itself, the road infrastructure and the caravan park.

Finally, the site is separated from the historic core of the village by the presence of the railway line, which dissects the village.

Therefore, this narrow strip of land can be released from the Green Belt for development without substantial harm to the remaining Green Belt areas, on the basis that it is well contained and lies separated from the surrounding open countryside. The mitigation measures proposed will enable a permanent and defensible settlement edge to form a suitable and robust Green Belt boundary.

The retention of the existing vegetation structure and the inclusion of a landscape buffer to the south will preserve the separation of settlements and the integrity and character of the surrounding rural landscape.

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1. INTRODUCTION AND BACKGROUND

Instruction

- 1.1. Lockhart Garratt Ltd has been instructed by M Scott Properties Ltd to undertake an appraisal of the implications of the proposed release of land from the Metropolitan Green Belt to facilitate the proposed residential development on land to the west of Park Street, St Albans (hereinafter referred to as the 'Site').
- 1.2. This document will consider the potential for the development of the Site to include the release of the land from the Metropolitan Green Belt for residential-led development. It will consider the existing evidence base in relation to the Green Belt, and then will undertake an appraisal of the existing contribution made by the Site to the five purposes of the Green belt as set out in paragraph 80 of the National Planning Policy Framework, and the implications of its release.
- 1.3. Finally, it will suggest mitigation measures to help retain the character of the settlement edge whilst preserving the separation of settlements and the integrity and character of the surrounding rural landscape.

Site Location

- 1.4. The land in question includes an elongated arable field, located along the western settlement edge of Park Street, to the south of St Albans. The central grid reference of the Site is TL 145 044 and the Site boundary is shown on the Baseline Information Plan (Ref. 18-0608) at **Appendix 1**.

2. EXISTING BACKGROUND INFORMATION

Policy Background

2.1. National Green Belt Policy is set out within paragraphs 79-92 of the National Planning Policy Framework. In particular, paragraph 79 states that the essential characteristics of the Green Belts are their openness and permanence, whilst paragraph 80 sets out the five purposes to be served by the Green Belt, as follows:

- Purpose 1: To check the unrestricted sprawl of urban areas;
- Purpose 2: To prevent neighbouring towns merging into one another;
- Purpose 3: To assist in safeguarding the countryside from encroachment;
- Purpose 4: To preserve the setting and special character of historic towns; and
- Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.2. Paragraphs 83-85 set out the framework for Local Authorities to alter Green Belt boundaries as part of the plan-making process.

Existing Evidence Base: Adopted Local Plan

2.3. The St Albans District Local Plan Review 1994 is the current adopted local plan, produced by St Albans City and District Council. This is in the process of being replaced by a new Local Plan, which is anticipated to be adopted in the spring of 2020. Until such time that the new local plan is approved, a number of saved policies remain in place, including Policy 1, which discusses the Metropolitan Green Belt and the restrictions placed upon it by the District Council.

Policy 1 – Metropolitan Green Belt

“The whole of St Albans District lies within the Metropolitan Green Belt except for the following areas:

- *The towns and specified settlements listed in Policy 2;*
- *Land North of Buncefield, Hemel Hempstead (proposed warehousing, see Policy 20, ref: EMP.7);*
- *Colney Street Industrial/Warehousing Estate (see Policy 20, ref: EMP 22);*
- *North-East Hemel Hempstead (land west of Cherry tree Lane – see Policy 26).*

The boundaries of the Green Belt around these areas (as shown on the Proposals Map) have been defined by reference to the degree of long term expansion of the built-up areas acceptable in the context of the stated purpose of the Green Belt.

Within the Green Belt, except for development in Green Belt settlements referred to in Policy 2 or in very special circumstances, permission will not be given for development for purposes other than that required for:

- *Mineral extraction;*
- *Agriculture;*
- *Small scale facilities for participatory sport and recreation;*
- *Other uses appropriate to a rural area;*
- *Conversion of existing buildings to appropriate new uses, where this can be achieved without substantial rebuilding works or harm to the character and appearance of the countryside.*

New development within the Green Belt shall integrate with the existing landscape. Siting, design and external appearance are particularly important and additional landscaping will normally be required. Significant harm to the ecological value of the countryside must be avoided.”

- 2.4. Whilst it is acknowledged that the Site lies within the Metropolitan Green Belt, and the development of the Site would mean the loss of a small section of Green Belt land, it is the authors opinion that the Site is read as part of the existing settlement edge of Park Street on account of its close proximity to the settlement edge and the position of the A5183 (Watling Street) directly along its eastern boundary, and the A414 Park Street Roundabout along its northern boundary.
- 2.5. Immediately to the west of the Site lies the Watling Street Caravan Park, and associated parking and infrastructure, as well as an electricity sub-station, which are urbanising influences within the setting of the Site.

Green Belt Review Purposes Assessment

- 2.6. The Green Belt Review Purposes Assessment was produced for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council in November 2013, with the aim of delivering a review that provides a robust assessment of the various functions of the different areas of Green Belt.
- 2.7. The Site forms a minor element of the Parcel GB28 – Green Belt Land to North of How Wood, a small parcel of predominantly arable farmland.
- 2.8. In terms of the parcels contribution to the five Green Belt purposes, it scores either ‘Limited or No’ and ‘Partial’ against all of the actual NPPF criteria. The parcel only scores highly against an additional criterion added by the Local Planning Authority, which this appraisal does not consider relevant to the national Green Belt standards.
- 2.9. If the Site itself were considered in isolation, then it is likely that it would score lower than the overall parcel, and therefore it is considered that the Site does not contribute to the wider Green Belt on account of its containment, transitional sub-urban character, and its low scores within the Green Belt Review Purposes Assessment.

3. CONTRIBUTION OF THE SITE TO THE GREEN BELT

Introduction

- 3.1. This section will present an appraisal of the contribution of the Site to the initial four purposes of the Green Belt as set out in paragraph 80 of the National Planning Policy Framework. It is considered, in conjunction with the Local Planning Authority's (LPA) views in their published evidence base, that the fifth purpose is largely intended to ensure that urban brownfield land is the primary consideration for development, and is therefore not relevant to this context.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 3.2. To the immediate south and east of the Site, the existing settlement edge, along with Watling Street, provide an urban boundary that contains the Site and contributes to its transitional sub-urban character.
- 3.3. To the immediate west and north of the Site, an established tree lined boundary separates the Site, both visually and in terms of character, from the open countryside to the west of the settlement edge. As a result, the Site is contained to the north and west.
- 3.4. It is therefore considered that, due to the Site's containment along all of its boundaries, the potential for urban sprawl as a result of the development of this Site is unlikely, as a result of the physical barriers that separate it from the open countryside to the west. Furthermore, the urban edge context of the Site to the south, in the form of existing development on Old Orchard and Hawfield Gardens is such that its development would not extend the built limit of Park Street any further west than its current limits, but would rather represent a 'rounding off' of this settlement.
- 3.5. The LPA's Green Belt Review Purposes Assessment scores the overall GB28 parcel of land as 'Limited or No' contribution to unrestricted sprawl due to its proximity away from large built-up areas.

Purpose 2: To prevent neighbouring towns merging into one another

- 3.6. The City of St Albans is a major urban area in the City and District of St Albans, lying between Hemel Hempstead and Hatfield, approximately 20 miles north of central London. The Site lies adjacent to a small village, known locally as Park Street, which lies to the south of St Albans and could be considered to be separated from the main central core of St Albans by the A414.
- 3.7. It is considered unlikely that the development of the Site would cause the merging of Park Street with St Albans to the north, as a result of position of the A414 creating a defensible boundary to the north.
- 3.8. To the immediate east of the Site, the residential dwellings associated with Park Street, create a sub-urban boundary that runs the entire eastern boundary of the Site, and therefore encroachment to the east is prevented. The nearest settlement to the east lies approximately 1600m away, at the western settlement edge of London Colney. As a result of the residential dwellings of Park Street lying between the Site and London Colney to the east, it is considered highly unlikely that the development of the Site will allow the merging of these two settlements.
- 3.9. To the west, the nearest settlement boundary lies approximately 800m away, at a town known as Chiswell Green. A small number of medium sized arable fields separate the Site from this

town, along with the A405 (North Orbital Road). Whilst it is acknowledged that this gap will be reduced, the position of the A405 road and the Watling Street Caravan Park and sub-station prevent any merging between Park Street and Chiswell Green.

- 3.10. To the south, an existing residential development that forms part of Park Street, creates a strong sub-urban boundary that prevents development further south, and thus prevents the merging of Park Street with the eastern extent of Chiswell Green.
- 3.11. It is therefore considered that due to the position of the existing settlement edge of Park Street along the Site's eastern and southern boundaries, and the relatively small proportion of the existing gap to the north and west, the development of the Site is unlikely to substantially contribute to the merging of towns into one another.
- 3.12. The LPA's Green Belt Review Purposes Assessment scores the overall GB28 parcel of land as 'Partial' contribution to preventing neighbouring towns from merging.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.13. As a result of the position of the existing settlement edge of Park Street to the immediate east and south of the Site, and the A414 to the immediate north, encroachment into the countryside through the development of the Site is considered to be minimal, due to the existing man-made boundaries.
- 3.14. Whilst it is acknowledged that the development of the Site would result in the loss of this narrow strip of arable land, the Site sits within a natural narrow wedge of land, that lies between the settlement edge and the existing Watling Street Caravan Park, and creates a logical extension to the existing settlement edge.
- 3.15. The small area of open countryside to the west could be considered to be most at risk of encroachment into the countryside, however this area lies beyond the existing caravan park, which itself is separated from the Site by a strip of mature woodland, creating a natural barrier between the Site and the pasture fields to the west.
- 3.16. As a result, the perception is that of separation between the Site and the open fields to the west, particularly on the approach into Park Street from the A414 to the north.
- 3.17. The LPA's Green Belt Review Purposes Assessment scores the overall GB28 parcel of land as 'Partial' contribution to safeguarding the countryside from encroachment, and notes that urban influences are strong and that levels of visual openness are variable and generally contained.

Purpose 4: To preserve the setting and special character of historic towns.

- 3.18. The city of St Albans can trace its origins back to Roman times, lying along the historic roman road of Watling Street which connected the city of London to the rest of England. The settlement of Park Street also lies along this historic road, with the main historic core of Park Street lying to the south of the Site beyond the railway line.
- 3.19. To the north of the railway line, residential dwellings consist of post-war detached and semi-detached properties, along with modern detached dwellings along Hawfield Gardens and Old Orchard, to the immediate south of the Site.
- 3.20. As a result, the northern section of Park Street is comprised of a mixture of building ages and vernacular, showing the natural evolution of the village over time. The historic core of the

village is separated from the Site by the railway line, therefore creating an existing man-made boundary. As a result, it is considered unlikely that the development of the Site would alter the setting and special character of the historic core of Park Street.

- 3.21. The LPA's Green Belt Review Purposes Assessment scores the overall GB28 parcel of land as 'Limited or No' contribution to the protection of the setting and special character of historic towns.

Purpose of the London Green Belt

- 3.22. The Metropolitan Green Belt now covers almost half a million hectares and 92% remains undeveloped. The origins of the Green Belt date back to the late 19th century and have been developed over time, to create a 'green belt ring' around London as a result of urban expansion.
- 3.23. The Metropolitan Green Belt is the largest of England's 14 Green belts. The Adopted Local Plan describes the role of the Green Belt as maintaining the existing settlement pattern as a network of towns and villages which are separated by stretches of countryside.
- 3.24. This appraisal has identified that the development of the Site would maintain the existing settlement pattern by focusing development in a linear pattern along Watling Street. The settlement extent of Park Street would not be pushed any further north or west than currently exists.
- 3.25. The small area of open countryside to the west of the Site would be maintained and protected behind the Watling Street Caravan Park and associated established tree cover.

4. MITIGATION MEASURES

4.1. In order to ensure that the proposals can be successfully integrated into this setting, a number of potential design principles and mitigation measures have been identified. These include:

- Retention of existing tree cover along the Site's western boundary, to screen the Watling Street Caravan Park to the west, and to maintain the Site's containment from the open countryside to the west, beyond the caravan park;
- Retention and strengthening of the existing vegetation along the Site's eastern boundary, to retain the green, tree lined character along this section of Watling Street;
- Retention of existing boundary vegetation to preserve the degree of visual containment afforded to the Site, and to ensure that the proposals are seen within the context of an established green infrastructure;
- Retention of a wide grass verge along the Site's eastern boundary, to tie in with the existing character of the settlement edge;
- Creation of a narrow landscaped buffer along the immediate southern boundary, to soften the appearance of the Site from the existing properties along Hawfield Gardens and Old Orchard to the south of the Site, and to provide interest along this boundary when viewed from the south;
- Inclusion of tree, shrub and hedgerow planting within the internal Site area, to add interest to the development and to help integrate the development into the receiving environment; and
- Use of locally native plant species, where appropriate, to ensure that the proposals are in keeping with the character of the Site, its setting and the wider landscape context.

4.2. The mitigation measures outlined above will ensure that the proposals relate positively to the character of the Site and its setting, and do not appear incongruous when viewed from the wider village setting and wider landscape context.

5. CONCLUSION

- 5.1. It is the conclusion of this appraisal that the Site exhibits a transitional sub-urban character as a result of its close association with the existing settlement edge.
- 5.2. The Site is well contained within a narrow strip of arable land, that is bound by the existing settlement edge to the south and east, the existing highway infrastructure to the north, and the Watling Street Caravan Park to the west.
- 5.3. As a result, the Site relates more positively to the existing settlement edge, than the open countryside that lies to the west, beyond the line of mature trees and the caravan park.
- 5.4. The Site is separated from a number of other nearby settlements, by the presence of the village of Park Street itself, the highway infrastructure and the caravan park.
- 5.5. Finally, the Site is separated from the historic core of the village by the presence of the railway line, which dissects the village.
- 5.6. Therefore, this narrow strip of land can be released from the Green Belt for development without substantial harm to the remaining Green Belt areas, on the basis that the Site is well contained and lies separated from the surrounding countryside. The mitigation measures proposed above will enable a permanent and defensible settlement edge to form a suitable Green Belt boundary.
- 5.7. The retention of the existing vegetation structure and the inclusion of a landscape buffer to the south will preserve the separation of settlements and the integrity and character of the surrounding rural landscape.






6. APPENDICES

Appendix 1:

Baseline Information Plan Ref. 18-0608



Legend

-  Site Boundary
-  Study Area
-  Listed Buildings
-  Scheduled Ancient Monument
-  Metropolitan Green Belt

REVISIONS:

DATE:	VERSION:	INITIALS:



CELEBRATING 20 YEARS
1998 - 2018

TITLE: Location Map

PROJECT/SITE: Park Street, St Albans

CLIENT: M Scott Properties Ltd

MAP REF: 18-0608

VERSION: 1

DATE: 19/06/18	SCALE: 1:20,000 @A3
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APPROVED BY: IJD	PRODUCED BY: ACB
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