

CPRE Hertfordshire initial commentary and analysis on St Albans City and District Council Draft Local Plan 2041 Regulation 18 Consultation (August 2023)

About us

CPRE Hertfordshire is a local countryside charity. We work to promote, enhance and protect a beautiful, thriving countryside for everyone to value and enjoy.

Founded in 1928 we are a grassroots organisation, with 800 members and a team of 4 part-time staff and a few dozen volunteers. CPRE Hertfordshire has a long history of campaigning against inappropriate development on Hertfordshire's green spaces. We also work with local groups around the county, providing advice on how they can best protect the countryside near them.

If you would like to help, then please consider [becoming a member](#) or [making a donation](#). Further information about all of our work can be found on [our website](#). Thank you.

CPRE Hertfordshire is a Charitable Incorporated Organisation Registered charity number: 1162419. CPRE holds and manages data in strict accordance with the Data Protection Act (2018). Read our Privacy Policy on our website.

Introduction

This document has been compiled by CPRE Hertfordshire's planning specialists and volunteers. It provides a source of information to help members, local organisations and campaign groups develop their response to the St Albans Draft Local Plan (Reg 18).

We will publish a more detailed technical report in September which can also be used to support your response.

Comments on the Draft Local Plan should be submitted to St Albans City and District Council by 25th September 2023 via:

- The on-line questionnaire at <https://www.stalbans.gov.uk/new-local-plan>
(a Word version of the questionnaire is available on request from the Council)
- Email to: planning.policy@stalbans.gov.uk
- Post to: Spatial Planning, St Albans City & District Council, Civic Centre St Peter's Street
St Albans Hertfordshire AL1 3JE

General background

- The current stage of the process is a consultation on preferred policy options under Regulation 18 of the relevant Planning Acts.
- There is no obligation on St Albans City and District Council to include all or any of the proposed provisions in the next, formal version of the Local Plan when it is published.
- Anyone can comment to the Council on any aspect of the consultation and associated documents, in writing, through the Council's Consultation Portal or by email or post. Although the Council has asked you to respond to specific question on each policy and site, there is no requirement to do so but it is helpful to specify the policy or site to which you are responding.
- The Council must consider all comments made that are relevant to the Draft Local Plan, before deciding what to include in the next version, also known as the Publication or Submission Local Plan.
- The Publication Local Plan will then be subject to a minimum six week consultation during which anyone can make representations on whether or not the Plan is 'sound' as defined by Local Plan Regulations.
- Any such representations that the Plan is unsound or not legally compliant will be considered by a Planning Inspector during a subsequent public examination of the Local Plan.

Our point of view

CPRE Hertfordshire believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan.

CPRE Hertfordshire believes that planning is crucial to empowering local communities and making sustainable, liveable places. Ensuring everyone has an affordable home that meets their needs is essential to that, both in town and country.

Equally, it is vital that new development is planned intelligently. Our countryside is precious and finite and urgently needs better management in the face of the climate and nature emergencies. Critical to this is that land is not lost to development unnecessarily.

More new homes are undeniably needed and there is plenty of scope to use previously developed urban land (i.e., "brownfield") and take advantage of the changes taking place in town centres, working practices and elsewhere to help address this need.

Our primary concerns

We have several major concerns about the Draft Local Plan which are listed below.

Context and timing

It is neither necessary nor appropriate for St Albans City and District Council to be conducting a public consultation on its Draft Local Plan in the present period of uncertainty regarding the Government's imminent amendments to the National Planning Policy Framework (NPPF). The Draft Local Plan proposes very considerable releases of Green Belt based on out-of-date projections of future household growth and it is highly likely that the formula for calculating housing need in the future will be amended to take account of recent demographic changes which will have significant implications for St Albans.

Approximately 790 hectares of designated protected land are allocated to be removed from the Green Belt for housing, employment and other uses, with considerable environmental implications for residents, visitors and wildlife. The Draft Local Plan provides land for nearly 16,000 dwellings in addition to commercial uses, including a Strategic Rail Freight Interchange near Park Street.

Over-provision of housing

The Draft Local Plan states that it is a requirement for the Council to provide for housing need in full, as assessed by the Government formula (known as the 'standard method'). This is a fundamental flaw in the interpretation of the National Planning Policy Framework (NPPF) with regard to housing provision.

The Council has failed to take account of the National Planning Policy Framework (NPPF) as revised in July 2021, paragraph 11, footnote 7. This permits local planning authorities to restrict the scale of development due to planning constraints including protection of Green Belt and other designated areas and sites.

The Council is responsible for the preparation of housing targets for the Draft Local Plan and has used the Government's formula and 2014-based household projections. These are now totally discredited and it is vital that no commitment is made to any proposals in the Draft Local Plan until projections are updated and the implications carefully considered.

CPRE Hertfordshire accepts there is a need for housing in St Albans as elsewhere, especially truly affordable housing for local people, but the projections used in the Draft Local Plan are excessive and out of date. The latest projections, currently available for 2018, show a decrease in new households in the District for the plan period, and we firmly believe that this trend is likely to continue as is confirmed by the initial findings of the 2021 Census.

Recently, alternative interpretations of the NPPF related to the requirement to provide a supply of land for housing for five years, and over-riding the ability to constrain development for protected land, has led to councils allocating Green Belt for housing, and planning inspectors to allow appeals on Green Belt. This is bringing the planning system into disrepute and has led over 50 Councils throughout England to pause preparation of their Local Plans pending clarification by the Government of the basis for calculating housing need.

By contrast, St Albans City & District Council has made the decision to continue preparation of a Draft Local Plan allocating sites with huge implications for protected countryside throughout the District. The Draft Local Plan is in effect a plan for the over-provision of housing rather than a comprehensive development plan for all land uses and activities in the District, as required by legislation.

Growth and development

Strategic Policy SP1 is ambiguous and misleading as a basis for the rest of the Plan in that it refers repeatedly to ‘growth’, and the requirement for it, rather than development. Economic development does not, should not, automatically mean that there is a demand for new greenfield sites to accommodate it.

This is important because it presents the unquestioned need for ‘growth’ as a justification for use of land in the Green Belt elsewhere in the Draft Local Plan. The Plan sets out a series of proposals for major development in the Green Belt, which directly conflict with the first Objective of the Plan’s Spatial Strategy, as set out in Table 1.2, to protect and enhance the Green Belt.

There is no discussion in the Draft Local Plan of the appropriateness of further economic growth which requires the use of Green Belt land in the future. The Levelling Up and Regeneration Bill, presently under consideration in Parliament, seeks to promote opportunities for development throughout the country which would lead to the reduction of pressure to use designated protected land for new services and facilities.

This is particularly relevant for proposals for the release of Green Belt land for the Strategic Rail Freight Interchange near Park Street, and for “Hemel Garden Communities”, and where the Draft Local Plan identifies the over-supply of land for employment in St Albans.

Lack of protection of Green Belt as a key priority

Effectively, all land within the District boundary outside the built-up areas is designated as Green Belt. The Green Belt includes nationally and locally designated environmental sites which are key characteristics of the District contributing greatly to the quality of life of residents and visitors. It is unacceptable that its protection and enhancement is not regarded as a specific Key Priority rather than a lesser Objective in the Draft Local Plan.

A basic characteristic of the Green Belt is its permanence, and it should be regarded as a principal constraint to development and a huge asset for the District. Even within the Local Plan Objectives (Table 1.2), the Green Belt is referenced only once, and this is in relation to locating new development rather than reinforcing its value as an asset. The Draft Local Plan thereby reduces the Green Belt in prominence and significance.

The minimal treatment of Green Belt in policy terms in the Draft Local Plan appears intentional and Strategic Policy 3 is in effect a policy indicating housing provision. This is entirely inappropriate in a District where protected countryside is a highly valued and valuable resource.

By contrast with the treatment of Green Belt and the climate emergency, the “Hemel Garden Communities” are given prominence and more detailed treatment, further emphasising the skewed Green Belt treatment nature of the Draft Local Plan as a programme for excessive housing and little else. This is a huge opportunity lost and policies which mention Green Belt (paragraphs 3.46 seq.) do so only in the context of housing provision.

All the urban extensions are in the Green Belt, contrary to national policy unless justified by exceptional circumstances. These should in any case be based on up-to-date and reliable assessments of housing need.

Chapter 3 – Sustainable Use of Land and the Green Belt, is mainly about development, and quotes national policies in paragraph 3.3 but not those on protection of designated areas including the Green Belt, which do not appear until later in paragraph 3.15.

Failure to address climate change

St Albans City & District Council declared a Climate Emergency in 2019 and the Draft Local Plan is seen as the key mechanism for the Council to implement the requirements of this declaration and it is noted as a key priority. The four policies identified in Chapter 2 are no more than general statements of intent with regard to this critical agenda.

Despite the requirements of the NPPF and the Planning and Compulsory Purchase Act 2004 and subsequent legislation, proposed policies and subsequent justifications fail to define any meaningful means of implementation. This is a major opportunity lost for a Council area with such high environmental quality.

A more detailed carbon reduction pathway is needed to meet national obligations for net zero emissions by 2050. Similarly, although biodiversity and related issues are considered these are not related to the implications of the scale of development proposed.

Underestimation of the opportunities for regeneration and reuse of land

The reuse of Previously Developed Land (PDL) is considered mainly in terms of the release of Green Belt land in Strategic Policy 3 – Land and The Green Belt; the only time Green Belt is mentioned in strategic policy terms. Both the impact of the pandemic, and projected social and economic trends are likely to create many more opportunities for the conversion of commercial and other space to residential use.

The re-use of urban car-parks for development is welcomed and a more comprehensive treatment of PDL is needed to provide an accurate picture of what may be possible beyond what is presently identified on the Council’s Brownfield Register. Huge changes are taking

place in the form and function of town centres, commercial activities and workspace and this is likely to increase the role of regeneration and reuse.

In both failing to assess accurately the potential of suitable PDL sites and underutilised land, and using out-of-date data, as already noted, Policy SP3 is misleading with regard to the need for major release of Green Belt for housing and employment. A more positive place making strategy is needed as part of a detailed brownfield land review of the existing built environment with benefits for existing and new residents.

Affordable housing

The provision of affordable housing is given some prominence in the Draft Local Plan with the implication that this justifies Green Belt release by permitting housing with a proportion of appropriate units. The Draft Local Plan also notes that St Albans is “relatively wealthy” and that house prices are above the national average.

It is misleading to suggest that truly affordable housing can be provided by private sector developers on Green Belt sites. Notwithstanding the almost complete failure by market housing developers ever to achieve their policy commitments for affordable housing, the existing definitions of affordable housing used by Government mean that no average earning household can afford even a low priced house in Hertfordshire as a whole, let alone St Albans. It is inappropriate to use this as justification for the release of Green Belt, even by implication.

Water, waste and other utilities provision

The Draft Local Plan devotes one paragraph each to water supply, sewerage, gas and electricity, with slightly more detailed treatment of digital infrastructure. Given the known deficiencies and pressures in these areas, this is entirely inadequate.

Generalised statements are made with regard to future provision by statutory undertakings, without any specificity or discussion of the acknowledged water supply deficiencies which are themselves noted by Affinity Water as quoted in the Draft Local Plan (paragraph 9.4). Waste water treatment capacity is noted as supporting growth only up until 2031 (para. 9.5).

Natural resources

The Draft Local Plan notes that the District has long stretches of what are acknowledged as globally critical chalk streams, and lists the Rivers Ver, Colne and Lea as significant. Again, the treatment of this crucial topic is woefully inadequate in all respects; both in terms of their existing status and the actions needed in the future to ensure their survival, let alone improvement.

Biodiversity

Similarly inadequate is the treatment of biodiversity issues with no policy formulation beyond bland statements of intent and minor development management proposals, such as bird and bat boxes or provision for hedgehog-friendly fencing. Assertions regarding the provision of trees and landscaping features, for example, are meaningless in the face of the scale of loss of Green Belt envisaged by the Draft Local Plan.

The need for biodiversity net gain to be demonstrated for all development will be introduced in November of this year, to ensure that habitat for wildlife is in a better state than it was prior to development taking place. The Draft Local Plan needs specific policies to achieve this requirement which will be enforced through the 2021 Environment Act.

Next steps

As noted above, this is our initial commentary on the Draft Local Plan. We are now working on a more detailed technical review which we will issue ahead of the 25th September closing date for the consultation.

Please also see our Site Analysis attached to this initial commentary, to understand the specific impact on the Green Belt throughout the District as a whole, and tabulated by town and location.

CPRE Hertfordshire
August 2023

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TABLE 1								
St Albans Local Plan Reg 18 Consultation July 2023			CPRE Hertfordshire - Proposed Site Allocations Analysis				V8 02/08/2023	
To note: *Gross site area is not necessarily the area that will be developed but used here as may reflect total area to be removed from Green Belt.								
Data from 'Appendix 1 - Local Plan Sites'								
Proposed Site Allocation	Settlement	Site Ref	Green Belt Y/N	Gross Site* Area/Ha	Total proposed dwellings (including 750 beyond plan period)	Dwellings on brownfield in Green Belt	Dwellings not in Green Belt	Comments
RESIDENTIAL SITES IN GREEN BELT								
Group 1- Hemel Garden Communities Broad Locations (250+ dwellings)								
North Hemel Hempstead	Hemel Hempstead	H1	Y	87.2	1500	0	0	Includes 250 dw beyond plan period
East Hemel Hempstead (North)	Hemel Hempstead	H2	Y	146.3	1600	0	0	Includes 265 dw beyond plan period. Large education allocation included in site boundary.
East Hemel Hempstead (South)	Hemel Hempstead	H4	Y	105.2	2400	0	0	Includes 235 dw beyond plan period. Large education allocation outside red line boundary - see below
TOTAL Group 1- Hemel Garden Communities Broad Locations				338.7	5500	0	0	Includes 750 dw beyond plan period
Group 2 - Broad Locations (250+ dwellings)								
North St Albans	St Albans	B1	Y	46.75	1146	0	0	
North East Harpenden	Harpenden	B2	Y	43.24	762	0	0	
West Redbourn	Redbourn	B3	Y	27.02	593	0	0	
East St Albans	St Albans	B4	Y	21.69	522	0	0	Large education allocation outside red line boundary - see below
Glinwell, Hatfield Road	St Albans	B5	Y	20.85	436	0	0	Commercial garden nursery site
West of London Colney	London Colney	B6	Y	13.50	405	0	0	Large education allocation outside red line boundary - see below
North West Harpenden	Harpenden	B7	Y	12.19	293	0	0	
Harper Lane, north of Radlett	Radlett	B8	Y	11.40	274	0	0	
TOTAL Group 2 - Broad Locations				196.64	4431	0	0	
Group 3 - Large sites (100-249 dwellings)								
Burston Nurseries, North Orbital Road	St Albans	L1	Y	14.33	180	0	0	Commercial garden nursery site
West of Watling Street	Park Street	L2	Y	4.33	104	0	0	
TOTAL Group 3 - Large sites (100-249dw)				18.66	284	0	0	
Group 4 - Medium and small sites (5-99 dwellings)								
East and West of Miriam Lane	Chiswell Green	M1	Y	4.08	98	0	0	
Cross Lane	Harpenden	M1a	Y	6.47	95	0	0	
Hill Dyke Road	Wheathampstead	M2	Y	3.55	85	0	0	
Bedmond Lane	St Albans	M3	Y	5.84	78	0	0	

North of Oakwood Road	Bricket Wood	M4	Y	3.07	74	0	0	
Sewage Treatment Works, Piggottshill Lane	Harpenden	M5	Y	4.10	70	0	0	
South of Harpenden Lane	Redbourn	M6	Y	12.56	68	0	0	
Townsend Lane	Harpenden	M7	Y	1.91	65	0	0	
Verulam Golf Club	St Albans	M8	Y	2.80	65	0	0	
Amwell Top Field	Wheathampstead	M9	Y	4.27	60	0	0	
Tippendell Lane and Orchard Drive, How Wood	Park Street	M10	Y	2.32	51	0	0	
Rothamsted Research, Harpenden Campus	Harpenden	M11	Y	1.62	55	0	0	
North of The Slype	Gustard Wood	M12	Y	4.24	49	0	0	
North of Boissy Close	Colney Heath	M13	Y	1.44	49	0	0	
Beesonend Lane	Harpenden	M14	Y	2.03	43	0	0	
Bucknalls Drive	Bricket Wood	M15	Y	1.28	44	0	0	
Falconers Field	Harpenden	M16	Y	1.16	39	0	0	
North of Wheathampstead Road	Harpenden	M17	Y	2.26	38	0	0	
East of Kay Walk	St Albans	M18	Y	3.30	37	0	0	
Piggottshill Lane	Harpenden	M19	Y	0.86	29	0	0	
Lower Luton Road	Harpenden	M20	Y	0.74	25	0	0	
Rothamsted Lodge, Hatching Green	Harpenden	M21	Y	1.90	25	0	0	
Wood End, Hatching Green	Harpenden	M22	Y	0.74	14	0	0	
Ashdale Lye Lane	Bricket Wood	M23	Y	2.26	14	0	0	
South of Codicote Road	Wheathampstead	M24	Y	1.00	12	0	0	
Baulk Close,	Harpenden	M25	Y	0.53	8	0	0	
Highway Chipping Depot, Lower Luton Road	Wheathampstead	M26	Y	0.34	7	0	0	
Frogmore Vicarage, Frogmore	Park Street	M27	Y	1.06	5	0	0	
TOTAL Group 4 - Medium and small sites (5-99dw)				77.73	1302	0	0	
TOTAL - Residential sites in Green Belt Groups 1- 4				631.73	11517	0	0	Includes 750 dw beyond plan period
EMPLOYMENT SITES IN GREEN BELT								
East Hemel Hempstead (Central)	Hemel Hempstead	H3	Y	120.50	0	0	0	Policy SP5 refers to 55Ha
Modest extension of Rothamsted Campus	Harpenden	n/a	Y	Not specified				
Strategic Rail Freight Interchange/warehousing	Park Street	n/a	Y	33.16				Planning consent already granted for Strategic Rail Freight Interchange
TOTAL - Employment sites in Green Belt (AT LEAST)				153.66	0	0	0	
OTHER SITES IN GREEN BELT								
Group 8 - Other Sites in Green Belt								
Land to the North of Bricket Wood, bounded by the M25 and A405 North Orbital	Bricket Wood	OS1	Y	6.52	0	0	0	Community Facilities
Toulmin Drive / Highelms	St Albans	OS2	Y	0.19	0	0	0	Community Facilities
Miscellaneous								
Possible new stadium for St Albans FC in Green Belt (plus mention of enabling development - not clear if on existing site or on proposed)	St Albans	n/a	Y	Not specified				
Large education site near site H4	Hemel Hempstead	H4	Y	Not specified				

Large education site near site B4	St Albans	near B4	Y	Not specified				
Large education site near site B6	London Colney	B6	Y	Not specified				
Junction 8 M1 motorway - junction improvements	Hemel Hempstead	adj.H3/H4	Y	Not specified				
TOTAL - Other sites in Green Belt (AT LEAST)				6.71	0	0	0	
TOTALS - RESIDENTIAL, EMPLOYMENT and OTHER SITES IN GREEN BELT				792.1	11517	0	0	Includes 750 dw beyond plan period
RESIDENTIAL SITES - BROWNFIELD IN GREEN BELT								
Group 5 - Sites on Green Belt - Previously Developed Land								
Smallford Works, Smallford Lane	Sleapshyde	P1	Y	3.34	80	80	0	
Land at North Orbital Road	St Albans	P2	Y	1.88	64	64	0	
TOTAL Group 5 - Sites in Green Belt on Previously Developed Land				5.22	144	144	0	
NON GREEN BELT SITES within urban settlements (HELAA)								
Group 6 - Sites within Urban Settlements (HELAA)								
4 sites	Various	U1 to U4	N	2.62	93	0	93	
TOTAL Group 6 - Sites within Urban Settlements (HELAA)				2.62	93	0	93	
NON GREEN BELT SITES within settlements (Urban Capacity Study)								
Group 7 - Sites within Settlements (Urban Capacity Study)								
52 sites (mainly car parks/garage blocks)	Various	UC1 to UC52	N	13.45	775	0	775	
TOTAL Group 7 - Sites within Settlements (Urban Capacity Study)				13.45	775	0	775	
TOTAL RESIDENTIAL ON BROWNFIELD (in Green Belt) and NOT IN GREEN BELT (Groups 5 -7)				Gross Site* Area/ Ha	Total proposed dwellings	Dwellings on brownfield in Green Belt	Dwellings not in Green Belt	
TOTALS				21.29	1012	144	868	
TOTAL SITE ALLOCATIONS (Groups 1-7)				Gross Site* Area/ Ha	Total proposed dwellings (excluding Permissions and Windfall)	Dwellings on brownfield in Green Belt	Dwellings not in Green Belt	
TOTAL ALL SITES				813.39	12529	144	868	Includes 750 dw in GB beyond plan period
LESS - NON GREEN BELT & BROWNFIELD IN GREEN BELT				-21.29	-1012	-144	-868	
TOTAL IN GREEN BELT				792.1	11517	0	0	Includes 750 dw in GB beyond plan period
% OF TOTAL IN GREEN BELT				97.4	91.9	0.0	0.0	
To note: *Gross site area is not necessarily the area that will be developed but used here as may reflect total area to be removed from Green Belt.								

		TABLE 2				
St Albans Local Plan Reg 18 Consultation July 2023		CPRE Hertfordshire - Proposed Site Allocations Analysis			V8 02/08/2023	
		PROPOSED SITES IN GREEN BELT BY SETTLEMENT				
<p>To note: *Gross site area is not necessarily the area that will be developed but used here as may reflect total area to be removed from Green Belt.</p> <p>Data from 'Appendix 1 - Local Plan Sites'</p>						
Settlement	Proposed Site Allocation	Site Ref	Green Belt Y/N	Gross Site* Area/Ha	Total proposed dwellings (including 750 beyond plan period)	Comments
Bricket Wood	North of Oakwood Road	M4	Y	3.07	74	
	Bucknalls Drive	M15	Y	1.28	44	
	Ashdale Lye Lane	M23	Y	2.26	14	
	Land to the North of Bricket Wood, bounded by the M25 and A405 North Orbital	OS1	Y	6.52	0	Community Facilities
			TOTAL	13.13	132	
Chiswell Green	East and West of Miriam Lane	M1	Y	4.08	98	
			TOTAL	4.08	98	
Colney Heath	North of Boissy Close	M13	Y	1.44	49	
			TOTAL	1.44	49	
Gustard Wood	North of The Slype	M12	Y	4.24	49	
			TOTAL	4.24	49	
Harpenden	North East Harpenden	B2	Y	43.24	762	
	North West Harpenden	B7	Y	12.19	293	
	Cross Lane	M1a	Y	6.47	95	
	Sewage Treatment Works, Piggottshill Lane	M5	Y	4.10	70	
	Townsend Lane	M7	Y	1.91	65	
	Rothamsted Research, Harpenden Campus	M11	Y	1.62	55	
	Beesonend Lane	M14	Y	2.03	43	
	Falconers Field	M16	Y	1.16	39	
	North of Wheathampstead Road	M17	Y	2.26	38	
	Piggottshill Lane	M19	Y	0.86	29	
	Lower Luton Road	M20	Y	0.74	25	
	Rothamsted Lodge, Hatching Green	M21	Y	1.90	25	
Wood End, Hatching Green	M22	Y	0.74	14		
Baulk Close,	M25	Y	0.53	8		
Modest extension of Rothamsted Campus	n/a	Y	Not specified			
			TOTAL	79.75	1561	
Hemel Hempstead	North Hemel Hempstead	H1	Y	87.2	1500	Includes 250 dw beyond plan period
	East Hemel Hempstead (North)	H2	Y	146.3	1600	Includes 265 dw beyond plan period. Large education allocation included in site boundary.

	East Hemel Hempstead (South)	H4	Y	105.2	2400	Includes 235 dw beyond plan period. Large education allocation outside red line boundary - see below
	East Hemel Hempstead (Central) Employment	H3	Y	120.50	0	Policy SP5 refers to 55Ha Employment
	Large education site near site H4	H4	Y	Not specified		
	Junction 8 M1 motorway - junction improvements	adj.H3/H4	Y	Not specified		
			TOTAL	459.2	5500	
London Colney	West of London Colney	B6	Y	13.50	405	Large education allocation outside red line boundary - see below
	Large education site near site B6	B6	Y	Not specified		
			TOTAL	13.50	405.00	
Park Street	West of Watling Street	L2	Y	4.33	104	
	Tippendell Lane and Orchard Drive, How Wood	M10	Y	2.32	51	
	Frogmore Vicarage, Frogmore	M27	Y	1.06	5	
	Strategic Rail Freight Interchange/warehousing and country park	n/a	Y	33.16		Planning consent already granted for Strategic Rail Freight Interchange
			TOTAL	40.87	160	
Radlett	Harper Lane, north of Radlett	B8	Y	11.40	274	
			TOTAL	11.4	274	
Redbourn	West Redbourn	B3	Y	27.02	593	
	South of Harpenden Lane	M6	Y	12.56	68	
			TOTAL	39.58	661.00	
St Albans	North St Albans	B1	Y	46.75	1146	
	East St Albans	B4	Y	21.69	522	Large education allocation outside red line boundary - see below
	Glinwell, Hatfield Road	B5	Y	20.85	436	Commercial garden nursery site
	Burston Nurseries, North Orbital Road	L1	Y	14.33	180	Commercial garden nursery site
	Bedmond Lane	M3	Y	5.84	78	
	Verulam Golf Club	M8	Y	2.80	65	
	East of Kay Walk	M18	Y	3.30	37	
	Toulmin Drive / Highelms	OS2	Y	0.19	0	Community Facilities
	Possible new stadium for St Albans FC in Green Belt (plus mention of enabling development - not clear if on existing site or on proposed)	n/a	Y	Not specified		
	Large education site near site B4	near B4	Y	Not specified		
			TOTAL	115.75	2464	
Wheathampstead	Hill Dyke Road	M2	Y	3.55	85	
	Amwell Top Field	M9	Y	4.27	60	
	South of Codicote Road	M24	Y	1.00	12	
	Highway Chipping Depot, Lower Luton Road	M26	Y	0.34	7	
			TOTAL	9.16	164	
			TOTAL - RESIDENTIAL, EMPLOYMENT and OTHER SITES IN GREEN BELT	792.1	11517	Includes 750 dw beyond plan period
	To note: *Gross site area is not necessarily the area that will be developed but used here as may reflect total area to be removed from Green Belt.					