

ST ALBANS LOCAL PLAN HEARING STATEMENT

MATTER 3 – THE GREEN BELT

STONEBOND PROPERTIES

Issue 1 – Principle of Green Belt Release

Paragraph 146 of the Framework states that, before concluding that exceptional circumstances exist to justify changes to the Green Belt, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting housing need. This includes making as much use as possible of suitable brownfield sites and underutilised land, optimising the density of development and liaising with neighbouring authorities to determine whether they could accommodate some of the identified need for development.

Q1 - Has the Council examined fully all other reasonable options for meeting housing needs as required by the Framework?

Yes – Stonebond consider that all reasonable options have been considered and that there is a need to revise Green Belt boundaries to meet housing need. There is clearly insufficient brownfield sites in the area to meet housing need and the challenges of meeting need in adjacent authorities means it is highly unlikely they would be in a position to meet any of St Albans need, meaning a review of the Green belt is the only means by which housing need can be met locally.

Paragraph 147 of the Framework then states that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that Green Belt alterations are necessary, "...plans should give first consideration to land which has been previously-developed and/or is well served by public transport."

Q2 - In response to the Inspectors' Initial Questions, the Council refers to the application of buffers around settlements to help determine which sites to allocate. Is this approach justified, effective and consistent with national planning policy?

This is a key issue for Stonebond, which was identified in our Regulation 19 consultation response. The approach of the Council is clearly at odds with paragraph 147 of the NPPF (December 2023) which requires plans to first look at previously developed land (PDL) and/or sites well served by public transport.

The approach of the Authority has been to simply apply buffer zones of 250m or 400m around each defined settlement, which define areas they consider to be sustainable. This is clarified at paragraph 1.7 of LPSS 02.02 where it states:

For this reason it was appropriate to undertake a more spatially focussed piece of work with the initial area 2 of search defined by applying a buffer around each settlement inset from the Green Belt, which would assist in encouraging a sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt.

Whilst there is some merit in this approach, in that it identifies areas that are immediately adjacent to areas where services and facilities are located and potentially within walking distance, this is not the approach that the NPPF requires, which requires a focus on sites well served by public transport.

It is set out at paragraph 1.14 of LPSS 02.02 that:

Green Belt Sites identified in the HELAA but outside of the GBR buffers were not considered to be suitable due to their less sustainable location and because development on such sites would create holes in the Green Belt, leading to fragmentation.

The approach taken by the Authority means that there are areas around the District which are well served by public transport which have not been considered to see if there are suitable sites for development, simply due to being outside buffer zones and therefore considered as being 'less sustainable'. This includes Stonebond's site to the rear of Notcutts Garden Centre, which lies immediately adjacent to the key public transport corridor between St Albans and Hatfield (and is also part brownfield land). It is therefore precisely the type of site that the NPPF envisages should be identified and prioritised through a Green Belt Assessment – however a failure in the assessment process has meant that this has not been the case.

We highlighted in our Regulation 19 response that the approach of the assessment has led to Site P3 being identified for allocation as just 1% of it lies within the 400m Green Belt buffer around Hemel Hempstead. This buffer is supposed to allow for the identification of 'sustainable sites'. Yet the site lies on a narrow rural road with no footpaths making it clearly reliant on the car. Whilst the site could be made more sustainable through the development of the East of Hemel Site, this is not likely to happen in the short-term meaning the site would in all likelihood be developed in isolation.

On the other hand, Stonebond's site to the rear of Notcutts Garden centre (which is partially brownfield) lies immediately adjacent to a range of services and facilities and, as prioritised by National Policy, a key public transport route. It also benefits from public footpaths into St Albans. However, the site is not identified for allocation due to the approach taken to the Green Belt assessment. This is indicative of the ineffectiveness of the approach taken.

To be found sound, it is suggested that the Green Belt Assessment needs to be reviewed to undertake a proper assessment of areas that are well served by public transport and additional sites should be identified for allocation as appropriate. This point is made in the context of a) the additional need for deliverable sites to be identified through the Local Plan to meet housing need in the short term and b) the response set out below in relation to the Assessment's approach to washed over villages, which is not considered by Stonebond to be robust.

In relation to the creation of 'holes' in the Green Belt, it would be premature to make such a conclusion without assessing whether any site identified outside of the buffer zones (or any other revised approach to identifying sites well served by public transport) would actually impact the purposes of the Green Belt. Removing sites from consideration on the basis they are unsustainable or that they serve an important Green Belt is reasonable but to do so based solely on buffers zones, without a proper consideration of sustainability/public transport accessibility and the role of the site in meeting Green Belt purposes is not considered to be an effective approach to plan making.

Issue 2 – Green Belt Review

The approach in the Plan has been informed by the Stage 2 Green Belt Review 2023 (GB 02.02). That followed an earlier Green Belt Review Sites and Boundaries Study in 2013 and 2014 (GB 04.03 and GB 04.04). In response to the Inspectors' Initial Questions, the Council provided a consolidated list of all Green Belt changes proposed in the submitted Plan.

Q3 - Is the methodology by which sites have been assessed in the Stage 2 Green Belt Review sufficiently robust and transparent to support the proposed boundary revisions? If not, what approach should have been used and why?

Related to the points made above, the main issue with the Stage 2 Review is the approach to assessing and identifying suitable sites which are well served by public transport – which the assessment simply does not do. This should have been undertaken to comply with NPPF (December 2023) paragraph 147.

Paragraph 149 of the Framework states that if it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

Q8 - How has the Council considered 'washed over' settlements within the Green Belt? Are any changes proposed and/or necessary based on the evidence presented?

The Council has not made any changes to washed over villages, including Smallford. The approach of the Council is relying on boundaries from 1994 which is not leading to a robust assessment. This matter was raised in our Regulation 18 response, back in 2023, where the following key points were raised in relation to the Washed Over Villages Assessment, as they relate to Smallford:

- The Assessment does not revisit decisions from 1994 as to what constitutes part of the built-up area. As an example, the Notcutts Garden centre along with the adjacent pub and petrol station are not within the defined settlement boundary of Smallford, despite the fact they clearly form part of the urbanised area.
- No consideration has been given to more recent developments allowed in the Green Belt. As an example, the residential development immediately to the north of Notcutts Garden centre has not been considered. This affects the conclusions of the Assessment with regard to settlement and form, which is considered to be generally strong and linear, despite several recent areas of back land development.
- An inconsistent approach has been taken to the assessment settlements. As an example for key open spaces, which is the second criteria in considering whether the settlement is of open character, for Smallford, the same weight has been attributed to verges and a small undesignated green space on Oaklands Lane as has been given to formally allocated open spaces in the assessment of Sandridge, which is also noted as having 'a number of key open spaces'. This leads to both settlements scoring 'moderate' for key open spaces despite significant differences between the two settlements.

Stonebond consider that to provide a robust assessment of washed over villages, the baseline position in the assessment needs to be brought up-to-date and each of the criteria need to be reviewed and applied consistently, with any revised conclusions reflected in modifications to the Local Plan.

Q9 - Aside from sites proposed for development, are any other alterations proposed and/or considered necessary to the existing Green Belt boundary?

Yes – related to the points made above, further amendments to the Green Belt boundary could be required to reflect the revisions that are necessary to the Washed Over Village Assessment. This could see other settlements, including Smallford, which will effectively adjoin the urban area of St Albans with the allocation of Glinwell, inset from the Green Belt.

Issue 3 – Exceptional Circumstances

Q1 - Do exceptional circumstances exist to alter the Green Belt boundary in St Albans and has this been fully evidenced and justified as part of the plan making process?

Yes. The Authority have set out in GB 01.01 the exceptional circumstances case which Stonebond agree with. There has clearly been a significant under delivery of housing in St Albans for a long time which has led to acute affordability issues in the area, which can only be resolved by the release of Green Belt land for development.

There is insufficient PDL on which to accommodate the housing needs of the area. Given the scale of the affordability issues in the area, which are touched upon in our Matter 2 Statement, it is vital that Green Belt is released to at least meet the minimum housing need. Indeed, Stonebond consider that additional land should be released above the minimum level required to provide an element of flexibility that will maximise the chances of the minimum level of housing need being delivered and help contribute to the shortfall in affordable housing delivery, which is likely to remain well below the level required despite the amount of land identified for development.