

Examination of the St Albans City and District Local Plan - Stage 1 Hearing Sessions

Hearing Statement – Matter 3

Prepared on behalf of the Success Property Consortium



Revision Schedule

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
0	Final	JK	10/04/25	JK	10/04/25	FP	10/04/25

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Matter 3 – The Green Belt

The Success Property Consortium (SPC) set out below their responses to the questions raised by the Inspectors. The responses are set out in the order they appear in the Inspectors' MIQs. The Inspectors should assume that no comment is made by the SPC in respect of the questions that have are not included below.

3.1 Issue 1 – Principle of Green Belt Release

Question 1:

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.

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

Response:

The SPC agree with the Council that there are insufficient brownfield sites to meet the Council's housing and employment floorspace needs in full. It would also appear that no other local planning authority is able to assist the Council in meeting its needs in their areas. The Council therefore has no other choice but to undertake a green belt review and consider if exceptional circumstances exist to justify changes to the green belt boundary to meet its needs.

Question 2:

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."

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?

Response:

In the SPC's opinion, there are available and deliverable sites beyond the buffer zones (partially or fully) which are sustainable and accessible locations. They should not automatically be rejected because they are beyond the buffer zones (partially or fully). The Council should be identifying development land on the edge of existing settlements if they benefit from access to a range of services and facilities locally and benefits from access to other services located within a Tier 1 and/or 2 settlement.

One such site is being promoted by the SPC at Lye Lane in Chiswell Green. Representations were submitted to the Council on 7th November and can be found under representation reference number

225 on pages 1239 to 1245 of the 'St Albans Draft Local Plan 2041 Regulation 19 Publication by Submission Report' (LPCD 20.03). The SPC are expecting to debate the merits of this site at the 2nd set of Hearing Sessions.

Question 4:

In deciding to review the Green Belt boundary, how did the Council consider the provision of safeguarded land? Is the Plan consistent with paragraph 148 c) of the Framework, which sets out that, where necessary, areas of safeguarded land between the urban area and the Green Belt should be identified to meet longer-term development needs?

Response:

In the SPC's opinion, the Draft Local Plan does not currently safeguard land between the urban area and the Green Belt.

The Inspectors could identify potential 'safeguarded' development land on the edge of existing settlements if they have access to a range of services and facilities locally and benefits from access to other services located within a Tier 1 and/or 2 settlement. This could be secured by way of the Inspectors' recommended modifications (to move the green belt boundary) following the 2nd set of Hearing Sessions.

One such site is being promoted by the SPC at Lye Lane in Chiswell Green. Representations were submitted to the Council on 7th November and can be found under representation reference number 225 on pages 1239 to 1245 of the 'St Albans Draft Local Plan 2041 Regulation 19 Publication by Submission Report' (LPCD 20.03). The SPC are expecting to debate the merits of this site at the 2nd set of Hearing Sessions.

3.2 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.

Question 5:

Where the evidence recommended that areas were not taken forward for further consideration, how did the Council consider this in the plan-making process?

Response:

This is for the Council to answer. However, the SPC note that a large number of the site allocations chosen by the Council were 'not recommended' within the Stage 2 Green Belt Review 2023 (GB 02.02) for release from the Green Belt but have been included in the Draft Local Plan. For example, the following sites were considered to strongly meet the purposes of the Green Belt: Site H1 (North Hemel); Site H2 (East Hemel (north)); H4 (East Hemel (south)); B1 (North St Albans); B3 (West Redbourn); and B6 (West of London Colney). However, in the SPC's opinion, these sites:

- Are not located within the most accessible locations; and
- Have been chosen by the Council at the expense of other more accessible sites in lower tier settlements, and which (in some cases) have less harm to the purposes of the Green Belt.

For example, the site being promoted by the SPC at Lye Lane in Chiswell Green was not recommended within the Stage 2 Green Belt Review 2023 (GB 02.02) for release from the Green Belt (and not subsequently included in the Local Plan) even though it only 'moderately' meets the purposes of the Green Belt – see page 67 and 68 of the Stage 2 Green Belt Review 2023 (GB 02.02).

Representations were submitted by the SPC to the Council on 7th November to ask for the Council's re-consideration. The relevant submission can be found under representation reference number 225 on pages 1239 to 1245 of the 'St Albans Draft Local Plan 2041 Regulation 19 Publication by Submission Report' (LPCD 20.03). The SPC are expecting to debate the merits of this site at the 2nd set of Hearing Sessions.

The Council and Inspectors have an opportunity to bring forward these 'not recommended' sites by:

- Discussing the merits of these sites, including the SPC's site, at the 2nd set of Hearing Sessions. They could come forward as an Inspectors' recommended main modification; and /or
- The Inspectors requiring the Council to immediately review its housing and employment delivery sites position and identifies additional sites to:
 - meet the new housing target set out in the latest Standard Methodology and as required by paragraph 236 of the NPPF (December 2024); and
 - meet the identified employment land need set out in the South West Hertfordshire Economic Study (Sept 2024) (EMP 01.01).

3.3 Issue 3 – Exceptional Circumstances

Question 1:

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?

Response:

In the SPC's opinion, yes, it has been fully evidenced and justified as part of the plan-making process.

The SPC agree with Section 7 of the Green Belt and Exceptional Circumstances – Evidence Paper (GB 01.01) which sets out the factors that support exceptional circumstances in this case, including the Council's lack for non-Green Belt land and historic chronic failure to deliver homes to meet its needs which cannot be address without adjusting the Green Belt boundary.

Notwithstanding the above, the SPC consider that the Council could deliver more homes than the minimum required. Therefore, should the Inspectors decide it is necessary to increase supply to address the chronic shortfall in housing in the first five years of the plan, the case for exceptional circumstances would still be relevant to support further amendments to the Green Belt boundary for housing and / or employment floorspace related development.

End

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Stantec UK Limited
7 Soho Square
London
W1D 3QB
UNITED KINGDOM
stantec.com