

St Albans City and District Local Plan

Statement

Stage 1 Matter 3

On behalf of

The Trustees of the G A Simons Family Settlement.

Land Common Lane, Harpenden

(Reg 19 Sub 69)

1) This statement should be considered in conjunction with the Reg 19 Sub 69 with its attached appendices. Since the Reg 19 submissions, the NPPF (Dec 2024) has been published, which introduces Grey Belt, however, the Council has submitted the Local Plan for Examination in time for the transitional arrangements to apply.

2) In view of the changes in the new NPPF concerning Grey Belt and the recent decisions of the Council and a local Appeal decision regarding Grey Belt, a planning application has been submitted for self-build/custom housing on part of Field A. The release of our client's land from the Green Belt would enable a sale to a small/ medium enterprise with Affordable Housing provision and early delivery of housing.

3) We apologise if there is some repetition with our Statement under Matter 2, but there is a direct connection between the Green Belt Study and the Site Selection Methodology. In that the former has informed the latter with evidence upon which the latter relies to reach the conclusions on which sites to allocate.

4) Before dealing with the Questions, we wish to review the 5 purposes of including land in the Green Belt specifically in relation to our clients' sites. The NPPF 2023 Para 143 lists the 5 purposes: -

a) To check the unrestricted sprawl of large built-up areas

5) The sites are clearly restricted by the surrounding built development. Outward spread does not arise as it would extend beyond the existing buildings. Indeed there are further proposals for a new 6th form block to be added to the school.

b) prevent neighbouring towns from merging into one another

6) Development of the sites will not result or add to the merger of Towns. Whilst Harpenden is a Town, Wheathampstead is not. Criteria b) is specific to Towns. See Government Planning Guidance Feb 2025 (**Appendix 1**).

c) Assisting safeguarding the countryside from encroachment

7) The sites do not read within the landscape as being visually part of the countryside. The character of the area has changed dramatically following the construction of the secondary school and the new build dwellings. It is severed from the wider countryside by the surrounding built form.

d) Preserve the setting and special character of historic towns

8) A development of the sites will not impact upon the setting of Harpenden. It is far removed from the Conservation Area and does not meet this purpose.

e) Assist in the urban regeneration, by encouraging the recycling of derelict and other urban land

9) Given the high property values, the market forces have already eked out any available land. Industrial and other areas have been re developed, in the main for residential purposes. In any event this is not a criteria reviewed as part of the Councils evidence

10) In summary the sites no longer perform any of the functions for including land in the Green Belt. Firm defensible boundaries are provided by the surrounding physical features, such as the surface water concrete culvert on the eastern boundary

Issue 2 Green Belt Review

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?

11) The site assessments were not sufficiently robust or transparent. In some cases, it reviewed small sites independently and in isolation but in other cases it combined sites, without consideration of the individual circumstances of each part. Not using a finer grain approach (an issue raised by Inspectors at the last failed local plan) has disadvantaged some sites from coming forward as part of the plan.

12) As an Example the Green Belt Study drew an arbitrary and subjective site boundary in the case SA 29 (Proforma **Appendix 2**). Its subjective assessment therefore relates to a consideration of the area as a whole. Our client's sites are clearly defined discrete areas where development does not have wider Green Belt implications. The Study should have examined each site individually and carried out an assessment on that basis. The fact is the Study does review some sites on that basis

(see attached **Appendix 3**, in particular SA25, SA27, SA28 and SA 32 which are adjacent or near to our client's site, see also SA 38 and SA39), but not all sites, notably our clients. There is an inconsistency of approach, which has resulted in the wrong outcomes.

13) Had our clients land been assessed as a discrete parcel we believe the outcome would have been materially different, having regard to the purposes of including land in the Green Belt.

14) If the Green Belt Study was robust how is it that in the examples in **Appendix 4**, SA 32 Lower Luton Road, Harpenden, which has two facing boundaries to the open countryside including views from the Lea Valley Walk and SA 53 Amwell Top Field, Wheathampstead, which has two facing boundaries to the open countryside and one to open playing fields are considered acceptable for Green Belt release, in preference to our client's sites. Both of these proposed Green Belt releases will result in the outward spread of the settlement built form into the open countryside. There are a few other similar examples in the Green Belt Study. In terms of Green Belt impact this does not appear to make sense, which brings into question the methodology used and/or conclusions.

Q4 How did the evidence in the Stage 2 Green Belt Review inform decisions about which site to allocate?

15) From our submissions in relation to Matter 2 Issue 5 and the Appendices 3 and 4 referred to therein, it is evident from Local Plan Site Selection Proforma sheets that our clients' sites score was far better than all the Medium and Small Sites which have been selected. The issue, why our clients' sites were not selected can therefore only be related to the Green Belt Study assessment. The erroneous Green Belt Study assessment of our clients' sites has resulted in these not being taken forward, we can see no other reason for the exclusion.

Appendix 1

Guidance

Green Belt

Advice on the role of the Green Belt in the planning system.

From: **Ministry of Housing, Communities and Local Government** (</government/organisations/ministry-of-housing-communities-local-government>), **Ministry of Housing, Communities & Local Government (2018 to 2021)** (</government/organisations/ministry-of-housing-communities-and-local-government-2018-2021>) and **Department for Levelling Up, Housing and Communities** (</government/organisations/department-for-levelling-up-housing-and-communities>)

Published 22 July 2019

Last updated 27 February 2025 —

Contents

- Scope of guidance
- Assessing Green Belt to identify grey belt land
- Considering the impact on the remaining Green Belt in the plan area
- Proposals on grey belt land
- Identifying sustainable locations
- Golden Rules
- Considering the potential impact of development on the openness of the Green Belt

Scope of guidance

This guidance sets out:

Contribution	Illustrative features
--------------	-----------------------

- | | |
|--|--|
| | <ul style="list-style-type: none">- be adjacent or near to a large built up area- if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt) |
|--|--|

- | | |
|----------|--|
| Moderate | <p>Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to):</p> <ul style="list-style-type: none">- having physical feature(s) in reasonable proximity that could restrict and contain development- be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development- contain existing development- being subject to other urbanising influences |
|----------|--|

- | | |
|--------------|--|
| Weak or None | <p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none">- are not adjacent to or near to a large built up area- are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development |
|--------------|--|

Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages.

Contribution	Illustrative Features
--------------	-----------------------

- | | |
|--------|--|
| Strong | <p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none">- forming a substantial part of a gap between towns- the development of which would be likely to result in the loss of visual separation of towns |
|--------|--|

- | | |
|----------|--|
| Moderate | <p>Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none">- forming a small part of the gap between towns- being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, |
|----------|--|

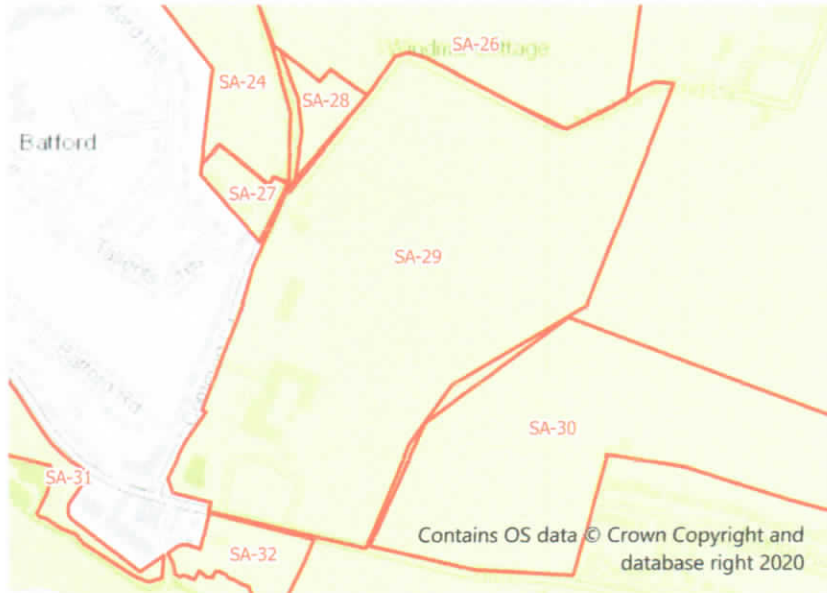
Appendix 2

Sub-area (SA): SA-29

Strategic Land Parcel: 40

Area (ha): 21.58

Location North-east of Harpenden



Legend

- Sub-area for assessment
- St Albans Green Belt
- Neighbouring Green Belt

Sub-area map



Looking south-west from the northern boundary of the sub-area onto an open field



Looking east from the north-western boundary of the sub-area onto an open field



Looking north from the southern boundary of the sub-area onto a school



Looking west from the eastern boundary of the sub-area onto a school and associated playing fields

Boundaries

The sub-area is bounded by Mackerye End Lane to the north, a dispersed tree line to the east and to the south-east, by Lower Luton Road to the south-west and by Common Lane to the north-west. Inner boundaries: north-west. Outer boundaries: north, east and south-east, and south-west.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	1	3	0
	Yes	5			

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

(a) Land parcel is located at the edge of a discrete built-up area The sub-area adjoins the large built-up area of Harpenden, with physical connection to its north-west boundary.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary. The sub-area is connected to the large built-up area of Harpenden. There are no prominent outer boundary features for the settlement within a reasonable distance of the sub-area which are likely to prevent outward sprawl. Development within the sub-area would lead to irregular sprawl of the large built-up area. The sub-area has predominantly recognisable and likely to be permanent inner boundaries, which provide an additional barrier to sprawl.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas. The sub-area forms a less essential part of the gap between Harpenden and Wheathampstead. It is judged that the gap is of sufficient scale that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development. Approximately 2% of the sub-area is covered by built form (this does not cover the newly built school for which data is currently unavailable). The majority of the sub-area comprises rural land uses including open fields and arable farming. There is a rising topography to the north-east, which provides medium to long views across the sub-area and onto wider countryside. However, Katherine Warrington School and grounds is located to the south-west of the sub-area which introduces urbanising influences. Overall, the sub-area has a largely rural character.

Purpose (4) To preserve the setting and special character of historic towns

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.

The sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.

Summary

The sub-area meets the purposes strongly overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purpose 4, performs weakly against purpose 2 and performs moderately against purpose 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	40	Significant	Partial	Significant	Significant

Assessment of wider impact

At the more granular level, the sub-area plays a similarly important role compared to the strategic land parcel against purpose 1, playing an important role of preventing the outward irregular sprawl of Harpenden in the absence of other prominent features. The sub-area plays a lesser role against all other purposes compared to the strategic land parcel as it forms only a less essential part of the gap between Harpenden and Wheathampstead; and the existing school encroaches on the openness of the countryside. As the sub-area does not abut an identified historic place or provide views to a historic place, it makes no contribution to purpose 4.

The sub-area adjoins SA-27 and SA-28 to the north-west, to SA-26 to the north-east, to SA-30 to the south-east, to SA-32 to the south-west, as well as wider Green Belt to the east and south-east. The removal of the sub-area in isolation is unlikely to alter the performance of surrounding Green Belt to the south due to the existing built form within the sub-area which constitutes sprawl and surrounding built form and urbanising influences, which already diminishes the sense of openness. However, the removal of the sub-area is likely to alter the performance of Green Belt to the north by introducing urbanising influences which would diminish the sense of openness in an area of Green Belt with an otherwise unspoilt rural character and strong connections to wider Green Belt due to the rising topography. Its release would also lead to the disproportionate sprawl of Harpenden.

In combination with either SA-27, SA-28 or SA-32, the removal of the of the sub-areas is unlikely to alter the performance of the wider Green Belt, as the sub-areas already contain built development, constituting sprawl and encroachment to the countryside, and are subject to urbanising influences from Harpenden and neighbouring development. However, their release would lead to the disproportionate sprawl of Harpenden.

In combination with either SA-26 or SA-30, the removal of the sub-areas is likely to result in significant irregular outward sprawl of the large built-up area of Harpenden and encroachment on the openness of the countryside.

In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-23, SA-24, SA-25, SA-26, SA-27, SA-28, SA-30, SA-31 and SA-32), the removal of the sub-area would constitute significant sprawl of the large built-up area and an erosion of the strategic gap between Harpenden and Luton, and Harpenden and Welwyn Garden City.

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel and its release in isolation or in combination is likely to significantly harm the performance of the wider Green Belt.

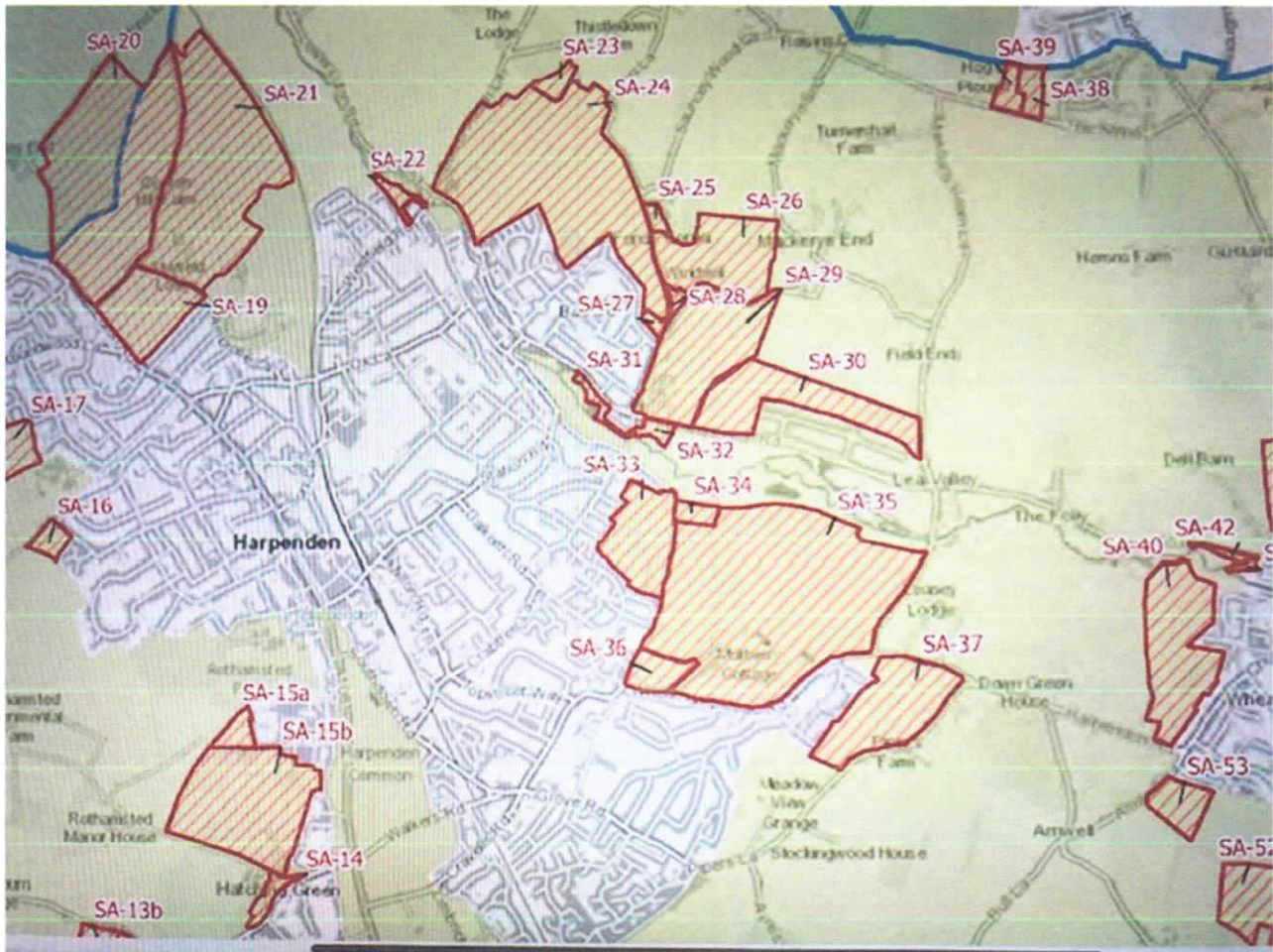
Consideration of Boundaries	
Commentary on boundary features and impact on Green Belt boundary strength.	The inner boundary is readily recognisable and likely to be permanent. The outer boundaries are predominantly readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundary would require strengthening.

Categorisation & Recommendation	
Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.

Appendix 3

Derek Bromley

From: Derek Bromley
Sent: 03 April 2025 17:32
To: Derek Bromley

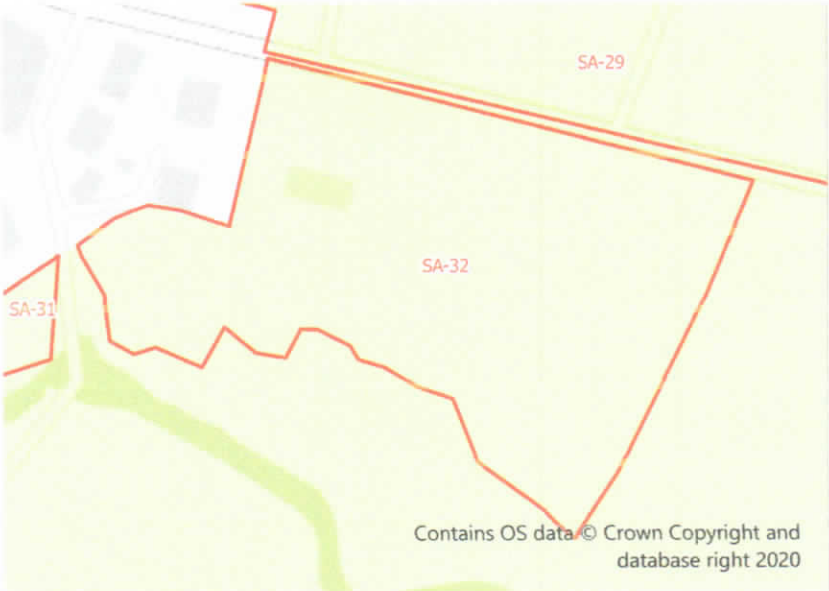


Sent from my iPhone

Appendix 4

Sub-area (SA): SA-32

Strategic Land Parcel: 37 Area (ha): 1.28 Location East of Harpenden



Sub-area map



Aerial photography used as a result of limited access to and / or views of sub-area at the time of the site visit. (Bing Aerial, September 2021).

Boundaries

The sub-area is bounded by Lower Luton Road (B653) to the north-east, by an intermittent tree-line to the south-east, by the policy constraint of the River Lea flood zone 3b to the south, and the irregular backs of residential properties and mature trees along Crabtree Lane to the west. Inner boundary: west. Outer boundaries: north-east, south-east and south.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	1	3	0
	Yes	5			

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

(a) Land parcel is located at the edge of a discrete built-up area The sub-area adjoins the large built-up area of Harpenden on its western boundary.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary. The sub-area is connected to the large built-up area of Harpenden. There are no prominent outer boundary features within a reasonable distance of the sub-area which are likely to prevent outward sprawl. The sub-area has predominantly recognisable and likely to be permanent inner boundaries, which provide an additional barrier to sprawl.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas. The sub-area forms a less essential part of the gap between Harpenden and Wheathampstead due to its small scale. It is judged that the gap is of sufficient scale that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development. NOTE: Unable to access site. This assessment has been completed largely from aerial photography.
Approximately 2% of the built-up area is covered by built form (excluding hardstanding). The sub-area comprises an open field and a residential property on the north bank of the River Lea. The surrounding built form and dense tree lines creates a strong sense of enclosure, which likely limits views to the surrounding countryside. Overall, the sub-area has a largely rural character.

Purpose (4) To preserve the setting and special character of historic towns

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.

The sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.

Summary

The sub-area meets the purposes strongly overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purpose 4, performs weakly against purpose 2 and performs moderately against purpose 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	37	Limited or No Contribution	Significant	Significant	Significant

Assessment of wider impact

At the more granular level, the sub-area makes a lesser contribution to purposes 2, 3 and 4, and a more significant contribution to purpose 1 compared to the strategic land parcel. The sub-area plays an important role in preventing the outward irregular sprawl of Harpenden in the absence of other prominent features. The small scale nature of the sub-area however means the sub-area plays a lesser role in preventing the merging of neighbouring settlements compared with the strategic land parcel which plays a strong role in maintaining the strategic gap between St Albans and Harpenden. The largely rural character of the sub-area, means that it plays an important role in safeguarding the countryside from encroachment; however this is a lesser contribution than the strategic land parcel which maintains an unspoilt rural character. As the sub-area does not abut an identified historic place or provide views to a historic place, it makes no contribution to purpose 4.

The sub-area adjoins SA-29 to the north, SA-31 to the west, and wider Green Belt to the east and south. The removal of the sub-area in isolation is unlikely to alter the performance of the Green Belt to the north and west, which already has significant urbanising influences from the presence of Katherine Warington School in the south of SA-29 and commercial and light industrial land uses to the north-east of SA-31. However, its release is likely to adversely impact Green Belt to the east and south by introducing urbanising influences, although the extent of the impact would be minimised due to the degree of enclosure in the sub-area.

In combination with SA-29, the removal of the sub-areas is likely to impact on the wider Green Belt by leading to further sprawl and diminishing the sense of openness.

In combination with SA-31, the removal of the sub-areas is unlikely to impact the wider Green Belt due to the strong sense of enclosure in both sub-areas which limit any views to the wider countryside and the existing urbanising influences which diminishes the openness of the countryside. A small slither of Green Belt between the SA-31 and SA-32 would also require removal to regularise the Green Belt boundary.

In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-23, SA-24, SA-25, SA-26, SA-27, SA-28, SA-29, SA-30 and SA-31), the removal of the sub-area would constitute significant sprawl of the large built-up area and an erosion of the strategic gap between Harpenden and Luton, and Harpenden and Welwyn Garden City.

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released in isolation or in combination with SA-31 is unlikely to significantly harm the performance of the wider Green Belt.

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength.	The inner boundary is readily recognisable and likely to be permanent. The outer boundaries are predominantly readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundary would require strengthening.
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Categorisation & Recommendation

Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in isolation as RA-20 or in combination with SA-31 as RC-4.
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Recommended Area Map



- St Albans District Boundary
- Neighbouring District Boundary
- Recommended for further consideration in combination
- Recommended for further consideration in isolation




ID	Area (ha)
RA-20	1.28
RC-4	2.51

Sub-area (SA): SA-53

Strategic Land Parcel: 37 Area (ha): 4.18 Location South-west of Wheathampstead



Legend

-  Sub-area for assessment
-  St Albans Green Belt
-  Neighbouring Green Belt

Sub-area map



Looking west from the north-eastern corner of the sub-area onto an arable field and some residential properties



Looking south from the north-eastern corner of the sub-area onto an arable field



Aerial photography used as a result of limited access to and / or views of sub-area at the time of the site visit.

Boundaries

The sub-area is bounded by the regular backs of residential properties and gardens on High Ash Road to the north, by a mature tree line to the east, by a woodland to the south and by Anwell Lane to the west. Inner boundary: north. Outer boundaries: east, south and west.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	1	5	0
	No	0			

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

(a) Land parcel is located at the edge of a discrete built-up area	The sub-area is not located at the edge of a large built-up area, in physical or perceptual terms.
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(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary.	The sub-area does not meet purpose 1.
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Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas.	The sub-area forms a less essential part of the gap between Wheathampstead and St Albans. It is judged that the gap is of sufficient scale that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.
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Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development.	The sub-area is not covered by any built form. The sub-area comprises an open arable field. The sub-area has a flat topography and is bounded by dense tree lines to the south-west which limit views into wider countryside. There are short views onto residential properties to the north-east. Overall, the sub-area has a largely unspoilt rural character.
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Purpose (4) To preserve the setting and special character of historic towns

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	The sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.
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Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or purpose 4, performs weakly against purpose 2 and performs strongly against purpose 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	37	Limited or No Contribution	Significant	Significant	Significant

Assessment of wider impact At the more granular level, neither the strategic land parcel nor the sub-area meet purpose 1 as neither are located at the edge of a large built-up area. The sub-area performs similarly strongly against purpose 3 compared to the strategic land parcel, by protecting the openness of the countryside. However, the sub-area performs a weaker role against purpose 2, forming only a less essential part of the gap between Wheathampstead and St Albans, compared to the strategic land parcel which plays a strong role in contributing to the strategic gap of these settlements. As the sub-area does not abut an identified historic place or provide views to a historic place, it makes a lesser contribution to purpose 4 in preserving a historic context, compared to the strategic land parcel.

The sub-area does not adjoin any other sub-areas however is surrounded by wider Green Belt to the north-east, south-west and south-east. Its removal in isolation is unlikely to alter the performance of the wider Green Belt due to the mature tree lines to the south-east and south-west boundaries which prevent longer views and connections to the wider Green Belt. However, its release would lead to a slightly irregular settlement edge to Wheathampstead.

Summary	Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released is unlikely to significantly harm the performance of the wider Green Belt.
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Consideration of Boundaries	
Commentary on boundary features and impact on Green Belt boundary strength.	<p>The inner boundaries are predominantly readily recognisable and likely to be permanent.</p> <p>The outer boundaries are predominantly readily recognisable but not likely to be permanent.</p> <p>If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.</p>

Categorisation & Recommendation	
Sub-area category & recommendation	<p>The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was released, the new Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening. Recommended for further consideration in isolation as RA-30 (including the strip of Green Belt land to the north of the sub-area).</p>

Recommended Area Map

- St Albans District Boundary
- Neighbouring District Boundary
- Recommended for further consideration in combination
- Recommended for further consideration in isolation

ID	Area (ha)
RA-30	4.26

St Albans City & District Council | Stage 2 Green Belt Review

Arup | 246