

SHF/P17-2907

21<sup>st</sup> August 2025

Sent by email only to [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

Dear Sir

**St Albans Additional Documents Consultation 4<sup>th</sup> July – 22<sup>nd</sup> August  
SADC/ED81**

Pegasus have been instructed by Bloor Homes to comment on SADC/ED81, the Site Sifting Process Addendum July 2025. The Paper is intended to provide further context for the site sifting process.

We have throughout the process of the preparation of the Local Plan objected to the site selection process and how the site at Harper Green, near Radlett has not been considered and also in terms of the Green Belt review the methodology and the identification of buffers. Whilst the Local Plan is being examined on the basis of the NPPF 2023, significant changes have been made to national policy through the NPPF December 2024 and the introduction of Grey Belt.

Objections have previously made to the site selection process both in respect of the HELAA and the Green Belt Assessment. Our main concern as set out in our Reg 19 representations to the SA and in particular the SA Section 5.3 Site Options is that in the SA process there is no audit trail of all the reasonable alternative site options considered and the Council's reasons for either including or excluding the sites.

It is not the purpose here to repeat our previous submissions but to draw the Inspectors attention to our particular Reg 19 representations (listed below) and any further comments in respect of SADC/ED81:

- LP Reg 19 objection SA Process (in particular page 5)
- LP Reg 19 SA Section 5.3 Site Options
- LP Reg 19 Table 3.1 Broad Locations

Our comments are made in respect of the Additional Documents Consultation in respect to the site selection process in particular in respect of the way in which Harper Green was excluded.

SADC/ED81A is Appendix 1 of the HELAA Site Sifting Table 2 includes sites that were rejected due to their location outside the Green Belt Buffer (not assessed at Proforma Stage). This includes land at Harper Green, near Radlett, HELAA ref STS-33-17 and STS-33-18 Table 2. A further 85 sites were lost at this stage. (It should be noted that HELAA sites STS-33-17 and STS-33-18, include the land

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which has planning permission for 206 dwellings, and the proposal was for further development to support the existing community).

Table 3 is a list of sites where the submission was superseded (not assessed at the Proforma Stage), this includes HELAA site ref STS-34-18 Harper Green Garden Village which was dismissed on the basis that it was superseded by a more recent submission.

The Local Plan Evidence – Site Selection Methodology Outcomes and Site Allocations states in paragraph 3.14 under the heading: Site Selection Proformas for Green Belt Sites:

*“In some locations there is more than one HELAA site due to multiple submissions over the course of several Call for Sites between 2016 to 2021. In these cases the most recent submission was considered in the site selection process and included within the Proforma.”*

However, in relation to land at Harperbury Hospital, Harper Green (HELAA sites ref Annex 15 St Stephen, the site is referenced STS- 33 –18 and STS-34-18), despite two options being put forward to provide an update on 5<sup>th</sup> March 2021, (the two scenarios were submitted in response to the Call for Sites, one for the larger Garden Village as previous but in addition a proposal for 400 dwellings which would be adjacent to the 206 dwellings that had recently been granted permission on the former Harperbury Hospital site which were being built out), the assessment focussed on the larger Garden Village proposal.

The sites in the HELAA 2021 report Annex 15 St Stephen were *“considered to be potentially suitable subject to absolute and non-absolute constraints being reasonably mitigated. Evidence base work, including a Green Belt Review, is underway and may change the site suitability in the future.”* The overall conclusion was that:

***“The site is considered be potentially suitable, available and achievable subject to further assessment as part of the site selection process.”  
Annex 15 in respect of STS-33-17, STS-33-18, STS-34-18, and STS-34-21.***

The Site Selection Methodology was based on the HELAA, and only the larger site was considered (M-040) (STS-34-21), but the site was not recommended for further consideration by the Green Belt Stage 2 Report and consequently did not progress through the Site Selection.

The Stage 1 Green Belt (2013) was followed by the Green Belt Review Stage 2 which *“fed directly into the site selection process”*. The Council applied a buffer around each settlement inset from the Green Belt. The Green Belt *“Stage 2 assessed the sub-areas driven by the sites promoted and considered through the HELAA process.”*

We have in our Hearing Statement to Matter 2, and Matter 3 expressed our concerns regarding the methodology and the identification of buffers in the Green Belt Review Stage 2. This is the crucial issue we have objected to in the Green Belt review which we consider has frustrated the assessment of sites and as a consequence has meant that in preparing the Local Plan, the Council

have not fully examined all other reasonable alternatives for meeting the identified need for housing in the district.

This is evident from Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations, LPSS.01.01 which states in paragraph 3.13:

*“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 its fragmentation.”* Land at Harper Green falls into this category i.e. included in Appendix 1 Table 2 of SADC/ED81 ( STS-33-17 and STS-33-18 not assessed as outside Green Belt buffer and STS-34-18 not assessed as superseded by a more recent submission STS-34-21 – but this was the larger site ref M-040 Green Belt Buffer Sites Part 2 – but Not Recommended to Progress.

As set out in our Hearing Statement on Matter 3 we objected to the application of the concept of buffers. The Council’s justification relies on the (faulty) assumptions that:

1. Sites outside of the GBR buffers will always be unsustainable and therefore the Council should not even consider these as potentially suitable for development. However:
  - Walking distance can be easily achieved within 250m-400m, not to mention cycle and public transport modalities
  - The Council’s approach does not take into account the contribution any parcel makes to the purposes of the Green Belt. It is entirely possible that parcels outside of the GBR buffers may make a weaker contribution to Green Belt purposes in a location which either is or can be made sustainable. The use of such sites would be preferable
  - Building on the last point of objection, the primary critique of the inclusion of buffers is that they arbitrarily constraint the assessment of suitable sites in the site selection process, which in turn constraints (potentially to a significant degree) the number of potential homes that can be delivered.
2. The development of sites within the Green Belt and outside of the GBR buffers will always create ‘holes’ in the Green Belt, which would have a harmful effect on the integrity of the Green Belt. However:
  - The purpose of the Green Belt boundary review process is simply to identify areas within the existing Green Belt which contribute weakly/strongly and therein, which would be most suitable to accommodate development, in the event that the LPA has identified there are exceptional circumstances to warrant the release of Green Belt land. In such circumstances, the weakest performing parcels of

Green Belt in sustainable locations should be selected in preference to stronger performing parcels, regardless of their relative location in the Green Belt. Given that the LPA will continue to retain control over the extent of Green Belt boundaries over time, there is no reason to suggest that creating 'holes' in the Green Belt would adversely affect the integrity of the Green Belt to any greater degree than allocating development solely in buffer zones – indeed, if the land which is proposed for release within the buffer zones would more strongly contribute to the purposes of the Green Belt than land which could be released outside the buffers, it would clearly be worse for the integrity of the Green Belt to release the land in the buffers.

- An appropriate methodology through the Stage 2 Green Belt Review would have ensured that such sites would not be put forward for allocation if a site makes a strong contribution to the purposes of the Green Belt or is in an unsustainable location.
3. Even if buffers were justified in principle, there is insufficient justification for setting these buffers at 250m for the smaller settlements in the district and 400m for the settlements of St Albans and Harpenden. The Council note that several factors<sup>1</sup> were taken into account, but other than listing these factors and a brief overview at section 4.2.1 of the Stage 2 Green Belt Review, there is no evidence which convincingly explains why 250m and 400m buffers are appropriate.

As a reasonable alternative approach, sub-areas found to perform weakly against Green Belt purposes in the Stage 1 Green Belt Review and all sites promoted through the various 'Call for Sites' exercises 2016–2021 should have been considered within the Stage 2 Green Belt Review, without the implementation of buffers. An assessment as to whether each site is or can be made sustainable can be undertaken on a site-by-site basis, and this would have the potential to identify all sustainably located sites which do not strongly contribute to the purposes of the Green Belt, rather than only those which sit within the arbitrary and overly narrow buffer.

The application of buffers to the Stage 2 Green Belt Review, which has fed into the site selection process and as a consequence has meant that the Council have not considered all reasonable alternatives.

We consider that as set out in our Matter 3 Hearing Statement that the Council's chosen methodology in the Stage 2 Green Belt Review has meant that the majority of land within the Green Belt has been discounted from any detailed assessment, because of the reliance on the Stage 1 Green Belt assessment and the introduction of arbitrary buffers around the district's settlements.

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<sup>1</sup> Including: Approaches taken in other local authorities with similar characteristics to St Albans; Overall size of the district, density of development and rural/urban character; The settlement hierarchy and local circumstances including settlement pattern and spacing; Extent of the green belt and landscape topography; Requirement for a robust and thorough assessment.

Harper Green is just one of many sites which includes some previously developed land within a sustainable location that the Council's methodology has excluded without any detailed analysis. The attached plan illustrates this point and shows the extent of existing built form at Harper Green, including the hospital, school and recently completed development, it also includes the red line of the site for which a hybrid planning application has recently been submitted (also attached is the concept masterplan for the site).

It is considered that the Council's approach does not therefore fully examine all reasonable options to promote the use of previously developed land within the district, and it also fails to "give first consideration" to previously developed land within the Green Belt as required by Paragraph 147 of the NPPF.

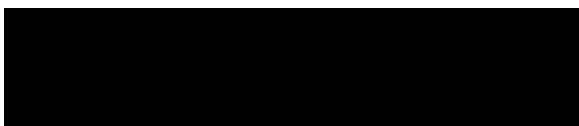
*LPSS.01.01 states at paragraph 3.25 that*

*"The initial draft Site Selection process set out above and in the Appendices lead directly to the draft Local Plan Regulation 18 Site Allocations in 2023. The updated and finalised Site Selection process set out above and in the Appendices leads directly to the draft Local Plan Regulation 19 Site Allocations set out in another report on the Agenda."*

However, as we have stated in our Reg 19 submission, in addition to our objection to the application of buffers in the Stage 2 Green Belt Review, there is no assessment of sites against the objectives of the Plan, in the SA. Consequently, there is no clear audit trail to justify Broad Location 8, and no assessment of any reasonable alternatives has been considered. The Council did not set out the site-specific circumstances that support the allocation, the site is not justified, as no evidence has been produced to justify why some sites have been taken forward and others have been rejected

We have consistently maintained objections to the methodology and site selection process that the Council has applied, and this is referred to in our Hearing Statement for Matter 3. It is considered that the publication of SADC /ED81 does not address the concerns made instead it attempts to justify the Council's flawed approach.

Yours faithfully,



**SARAH M HAMILTON-FOYN**  
**Executive Director**



Enc  
Land at Harper Green Built up Area Plan  
Concept Masterplan for Harper Green