



St Albans City & District Council Local Plan Examination – Matter 3

Land at London Road, St Albans

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1 Introduction

- 1.1.1 This statement has been prepared by Stantec on behalf of Catesby Estates pursuant to Matter 3 Legal Compliance of the St Albans City & District Local Plan Examination. This follows representations to both the Regulation 18 and Regulation 19 Local Plan consultations in relation to Catesby Estates' land interest at Land South of London Road, St Albans (labelled as Land East of Napsbury Lane within the HELAA). The site is labelled as SA-25-21 within the HELAA. Please note previous comments were made in the name of L&Q Estates, who has recent been purchased by Catesby Estates.
- 1.1.2 The main parcel of the site is located north of the London Road Cemetery, on land between London Road and Highfield Park Drive. This parcel has an area of 14.22 hectares, and is predominantly in agricultural use. The site is generally flat, with a very gentle fall from north to south. It has good planting around its boundaries, and has a school (Samuel Ryder Academy) to the north and the built form of Birklands Park and New House Park to the west. The site is considered to have a capacity for approximately 300 dwellings in a sustainable location on the edge of St Albans.
- 1.1.3 The site also includes land to the south of the London Road Cemetery, and further land to the western side of London Road adjacent to the junction of London Road and the A414. Details of the site and proposals are set out in the Vision Document that supports the previous consultation responses.
- 1.1.4 The site remains immediately available and is considered suitable and deliverable.



2 Matter 3

2.1 Issue 1 – Principle of Green Belt Release

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

- 2.1.1 Yes, the evidence available suggests that the housing need cannot be met solely on land outside of the Green Belt, and therefore Green Belt release is fully justified.

Q3: Having determined, at a strategic level, that alterations to the Green Belt boundary would be necessary, how did the Council determine the location of Green Belt releases? How does this correlate to the settlement hierarchy and spatial strategy?

- 2.1.2 In response to the previous Matter 2 questions, it is acknowledged that one Broad Location is situated within a Tier 4 settlement (site B3 at West Redbourn), whilst one is an extension to Radlett that sits within Hertsmere Borough.
- 2.1.3 St Albans is the largest settlement in the District, which provides the best sustainable transport offers and has an existing infrastructure provision. It is top of the settlement hierarchy as set out within the draft Plan. However, St Albans only benefits from two of the Broad Locations, with site B5 located on a spur into the countryside. It also does not benefit from any of the Large Sites. Further growth should be aimed at St Albans given its clear sustainable benefits. In this regard, the Local Plan fails to recognise St Albans's status within the District and the opportunities that growth here presents.
- 2.1.4 Within the Regulation 19 response, Catesby Estates (then L&Q Estates) has highlighted a number of concerns regarding the proposed allocations of Large Sites and Medium and Small Sites. Given the Regulation 19 version of the Plan was submitted prior to comments being received, it is assumed these comments have not been taken into account. The comments are not repeated here, but matters such as inappropriate access points, unsustainable locations and heritage impacts are all raised in that response. It is therefore unclear what the strategy for Green Belt release undertaken by the Council is as less appropriate sites with clear issues to deliverability do appear to be included.

2.2 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?

- 2.2.1 The Green Belt parcels assessed within the Green Belt Review Purposes Assessment did vary in scale.
- 2.2.2 The London Road, St Albans site controlled by Catesby Estates lies within parcel GB32, which is 101 hectares in area. The site area is 14.22 hectares in area and therefore it only represents 14% of the parcel being considered. At such a small portion, the Council is potentially discounting sites out of principle, rather than a more in-depth Green Belt assessment of the site itself. Green Belt assessments of individual site parcels should be undertaken in situations where sites are clearly in a sustainable location on the edge of top tier settlements. This will assist the Council in better understanding impacts.

2.3 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?



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- 2.3.1 Yes, the need to meet identified need is an exceptional circumstance to alter the Green Belt boundary. This should be viewed in line with current housing delivery in St Albans.
- 2.3.2 In appeal decision APP/B1930/W/24/3343986 dated 7 November 2024, both parties involved agreed the five year housing position to be at 1.7 years, described by the Inspector as a 'significant shortfall'. Within the 2023 Housing Delivery Test result, the Council delivered 1,233 dwellings against a target of 2,377 dwellings, giving a 52% result, triggering the presumption in favour of sustainable development.
- 2.3.3 When considering and allowing appeal APP/B1930/W/23/3331451 dated 3 May 2024, the Inspector assessed whether there were very exceptional circumstances to justify development in the Green Belt. In paragraph 30, the Inspector stated the following:
- '...given the parlous state of both housing land supply and delivery in this area, new housing does appear to be both so vanishingly rare and in such great need that the provision of it must attract significant weight'*
- 2.3.4 The housing need for the area is well above current delivery rates and will rise in the future. There has been a chronic under provision of housing in the District, including provision of affordable housing.
- 2.3.5 The Council's Urban Capacity Study January 2022 notes that there is the potential for 2,174 dwellings to come forward on sites for 5 dwellings or more (smaller sites are considered as windfalls). Given a housing need of 14,603, this represents only 15% of total need. In terms of suitability, the Council has only been able to find sites to accommodate 903 dwellings within Urban Settlements, which represents only 6% of total need.
- 2.3.6 Housing need cannot therefore be met in urban areas and Green Belt release is therefore fully justified and essential. This matches paragraph 7.3 of the Green Belt and Exceptional Circumstances – Evidence Paper September 2024 (GB 01.01), which confirms *'the Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map'*.





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