

# **EXAMINATION OF THE ST ALBANS CITY AND DISTRICT LOCAL PLAN, STAGE 1**

## **MATTER 3 – GREEN BELT**

### **HEARING STATEMENT OF LIGHTWOOD STRATEGIC**

#### **Issue 1 – Principle of Green Belt Release**

**25. 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.*"**

**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?**

As set out in our answers to Issue 4 (Distribution of Housing Growth) under Matter 2, there is a poor correlation between the identification homes of 545 at Site B3, Redbourn, and its place in the settlement hierarchy. It is spatially more sustainable to direct the proposed for Redbourn development to St Albans.

As set out in ours answer to Issue 3 (Sustainability Appraisal) under Matter 1, although Hemel Hempstead is a higher order settlement, the location of HGC in relation to rail services compares less well to the unallocated strategic locations identified at St Albans. The SA did not test a partial HGC and more growth at St Albans.

In these two instances the Plan does not appear to have given first consideration to more sustainably located land at St Albans, with better access to public transport, including rail. A decision has been made to 'go with' all the land that could form part HGC and to spread some development lower tier locations as the first consideration. There is no evidence that we can see to show that plan-making instead first consideration to more development at St Albans, yet for other planning reasons determined that alternative approach was preferable.

**Q4 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?**

The Inspectors are referred to Page 12 of our Regulation 19 representation. We see no evidence documenting the Council consideration of safeguard land.