

September 2025

Stage 2 Hearing Statements – Matter 3

St Albans City & District Local Plan

On behalf of Lands Improvement Holdings & Lawes
Agricultural Trust

Contents

- Matter 1 – Legal Compliance
- Matter 2 – Housing Growth and the Spatial Strategy
- Matter 3 – The Green Belt
- Matter 6 – Hemel Garden Communities
- Matter 7 – Residential Site Allocations

Stage 2 Hearings – St Albans City & District Local Plan

Weeks 2 and 3 MIQ Response on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT').

- 1.1 Submissions are made in respect of:
 - Matter 1 – Legal Compliance
 - Matter 2 – Housing Growth and the Spatial Strategy
 - Matter 3 – The Green Belt
 - Matter 6 – Hemel Garden Communities ('HGC')
 - Matter 7 – Residential Site Allocations (St Albans sites & Urban Car Parks and Garage Sites)
- 1.2 Overview

This response to the Stage 2 Examination, Week 2 and 3 Matters, Issues and questions (MIQ's) has been prepared by Urbanissta Ltd on behalf of Lands Improvement Holdings ('LIH') and Lawes Agricultural Trust ('LAT') in relation to the Land at North East Redbourn ('Site').
- 1.3 Assistance has also been provided by Town Legal (TL) in preparing these representations.
- 1.4 LIH is a strategic development company that acquires land and is the promoter partner of the Site owners, LAT. The Site has been deemed surplus to LAT's operational requirements and is available to provide longer term funding to support LAT. Together LIH and LAT seek to secure the release of the Site from the Green Belt for a residential led development scheme.
- 1.5 These MIQ submissions, supplement update and in some instances rely upon the material prepared and submitted at Regulation 18 and 19 stages of the draft Local Plan, as well as building upon MIQ submissions (oral and written) made for Matters 1 – 3 of the Examination before, during and after the Stage 1 hearing sessions. Submissions have also been made regarding the duty to cooperate (11th June 2025) and the St Albans City and District Council (StADC) Technical Consultation of August 2025. Collectively, these submissions in combination, are referred to in this MIQ Submission, as the (LIH/LAT Submissions)¹.
- 1.6 North East Redbourn is an omission site. A PPA has been agreed with StADC and an outline planning application is targeted for submission in January 2026. It is in a sustainable location, it is grey belt, capable of meeting the Golden Rules as defined by the NPPF (2024). It has been accepted as such, by StADC in a pre-application response dated 23rd May 2025.

"it is considered that the site would be likely to constitute grey belt as defined in the NPPF, and may be capable of meeting the Golden Rules requirements..... the planning policy context has changed significantly since our previous discussions and there is greater potential than was previously the case for the proposal to be considered acceptable in principle."
- 1.7 The Site is not in the National Landscape (NL), or in the setting of the NL. It is located on an eastward facing slope facing away from the NL and is over 2.5km from the NL boundary. Visibility testing has confirmed that the Site and proposed development would not be visible from the NL and therefore would not affect the setting of the NL. North East Redbourn lies toward the edge of the 12.6km Ashridge Commons and Woods buffer and will provide its own SANG as mitigation for any potential impacts arising.

¹ LIH/LAT Submissions:

- Regulation 19 - St Albans Technical Submission - Final Draft - 7th November 2024 and associated material listed in paragraph 2.1 & 2.4 p8;
- Regulation 18 - St Albans Technical Submission - Final Submission - 25th Sept 23 and associated material listed in paragraph 1.6 p8 and the Identified Sites Deliverability Assessment (September 2023).
- Town Legal Letter to StADC 18th June 2024
- Appendix 3 - Green Belt Appraisal & Landscape Analysis 07 November 2024
- MIQ's Submissions Matters 1, 2 and 3 – 14th April 2025.
- Hearing Statement 11th June 2025 on Duty to Cooperate
- LIH Submission to the St Albans Technical Consultation - 18th August 2025 FINAL DRAFT

Stage 2 MIQ's

Lands Improvement Holdings & Lawes Agricultural
Trust

Matter 3

Green Belt

Matter 3 – The Green Belt

Issue 1 – Green Belt Review

- 1.8 7. Following the Stage 1 hearings, the Council published and consulted on new evidence relating to the alteration of Green Belt boundaries. In particular, this considered how previously developed land was considered in the site selection process.
M3I1Q1 With reference to paragraph 146a of the Framework, has the Council adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land?
- 1.9 No comment.
- M3I1Q2 Does the additional evidence adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously-developed and/or is well-served by public transport?*
- 1.10 No comment.
- M3I1Q3 Does the evidence demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries?*
- 1.11 LIH/LAT Submissions¹ have consistently highlighted the chronic persistent under delivery in the StADC area, which has been ongoing for many years. This has resulted in high house prices, affordability constraints and a woeful 0.89-year land supply position². Consequently, it is considered that exceptional circumstances do exist to alter the green belt boundaries.
8. The application of some Green Belt policies (such as Policy LG8) rely on the Council's proposed boundaries to Green Belt settlements as shown on the policies map.
M3I1Q4 What is the justification for defining boundaries for those settlements that remain washed over by the Green Belt? Are the boundaries justified and effective?
- 1.12 No comment.

² Quick Reference Table 1 and 2 - St Albans City and District Authority's Monitoring Report 2024 1 April 2023 to 31 March 2024

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