

16th October 2025

Stage 2 Hearing Statements – Matter 11

St Albans City & District Local Plan

On behalf of Lands Improvement Holdings & Lawes
Agricultural Trust

Contents

- Matter 7 – Residential Site Allocations
- Matter 9 – Housing Land Supply
- Matter 11 – Natural Environment

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').

Overview

- 1.1 This response to the Stage 2 Examination, weeks 4, 5 and 6 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').
- 1.2 The MIQ responses made in respect of weeks 4, 5 and 6 relate to:
 - Matter 7 – Residential Allocations.
 - Matter 9 – Housing Land Supply.
 - **Matter 11 – Natural Environment.**
- 1.3 Assistance has been provided by Town Legal (TL) in preparing these representations.
- 1.4 We note that Main Modifications to the Regulation 19 version of the Local Plan have been published by St Albans City & District Council (StADC), and these have been considered in our representations below. The documents included within this MIQ response include:
 - SADC-ED85A - Reg 19 Local Plan Part A - Main Mods (All modifications)
 - SADC-ED85B - Reg 19 Local Plan Part B - Main Mods (All modifications)
 - SADC-ED85C - Local Plan Table of Modifications
- 1.5 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.
- 1.6 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 and Stage 2 Hearing Matters 1, 2, 3, 6 and 7. Collectively, these submissions in combination, are referred to in this MIQ Submission, as the (LIH/LAT Submissions)¹.
- 1.7 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."
- 1.8 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 Submissions Matters 1, 2, 3, 6 and 7 – 26th September 2025
- Oral submissions Matters 1 – 3 stage 2 Hearings - 14th October 2025

Stage 2 MIQ's

Lands Improvement Holdings & Lawes Agricultural
Trust

Matter 11

Natural Environment

Matter 11 – The Natural Environment

Hearing Day 15: Tuesday 11 November 2025

Afternoon Session – 14:00 – 17:30

2) Matter 11 – The Natural Environment

Issues: The Green Belt, Local Green Spaces, Biodiversity and The Chilterns National Landscape

Attending

Deadline 17th October 2025

Issue 1 – The Green Belt – Policies LG5 – LG9

1.9 *M11I1Q1 Are any alterations proposed to the Green Belt boundary which do not form part of the site allocations under Matter 7? If so, what are the exceptional circumstances which justify the alterations proposed?*

1.10 No comment.

M11I1Q2 What is the rationale for Policy LG5 criterion a) and b), given that the overarching approach is to consider development proposals in the Green Belt against national planning policy?

1.11 No Comment.

M11I1Q3 Is Policy LG6 (and the Plan when read as a whole) consistent with paragraph 47 of the Framework, which states that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements?

1.12 Any compensation measures should strengthen the purposes of the land remaining in the green belt. This not mentioned in either the Regulation 19 Plan or the suggested main modifications to the Draft Local Plan (SADC ED85A). Some of the identified aims in LG6 are geared around landscape improvement more generally applicable than being specific to the green belt.

M11I1Q4 What is expected from development proposals on the smaller site allocations released from the Green Belt in Part B of the Plan? How will development proposals be expected to meet the requirements in Policy LG6?

1.13 LIH Submissions¹ particularly in the Identified Sites Deliverability Assessment² that a significant number of sites are unable to achieve policy requirements set out in the Local Plan whilst also delivering the capacity identified. The requirement of Policy LG6 on the smaller sites to provide compensatory measures will inevitably be considered.

1.14 It is also not clear to what degree the site allocations in Part B of the Plan have been tested against Policy requirement such as this.

Q5 What is the justification for referring to limited infilling in Policy LG7, which is concerned with rural exception sites?

1.15 No comment.

M11I1Q6 What is the justification for referring to 'affordable-only' housing and setting a threshold of 9 dwellings in Policy LG7? Is this justified and consistent with national planning policy?

1.16 No comment.

M11I1Q7 What is the rationale for Policy LG8, given that the overarching approach in Policy LG5 is to consider development proposals in the Green Belt against national planning policy?⁴

1.17 No comment.

M11I1Q8 Is Policy LG8 consistent with national planning policy, with particular reference to whether the construction of new buildings is regarded as inappropriate development?

1.18 No comment.

² LIH Regulation 18 Submission Identified Sites Deliverability Assessment - 25th Sept 23

M111Q9 What is the justification for using prescribed amounts in Policy LG9? Is this justified, effective or consistent with national planning policy?

1.19 No comment.

Issue 2 – Local Green Spaces – Policies NEB2 and NEB3

1.20 *M112Q1 Does the Plan set out a composite list of all Local Green Space designations?*

No comment.

17. Paragraphs 105 to 107 of the Framework relate to the designation of land as Local Green Space. In summary, paragraph 106 states that Local Green Space should only be designated where it is a) in reasonably close proximity to the community it serves; b) demonstrably special and c) local in character and not an extensive tract of land.

1.21 No comment.

M112Q2 Do the Local Green Space designations in the Plan meet these requirements? How were individual sites tested against the requirements of the Framework

1.22 No comment.

M112Q3 Is Policy NEB2 consistent with paragraph 107 of the Framework where development is proposed on an area of Local Green Space?

1.23 No comment.

M112Q4 Is it sufficiently clear to users of the Plan what constitutes 'non- designated' areas of Local Green Space and 'significant publically accessible green areas'? Are Policies NEB3 and NEB4 effective?

1.24 No comment.

M112Q5 Is the Plan consistent with paragraph 103 of the Framework where existing open space, sports and recreational land and buildings is concerned?

1.25 No comment.

Issue 3 – Biodiversity and The Chilterns National Landscape – Policies SP10 and NEB5 – NEB12

M113Q1 Are Policies SP10 and NEB5 – NEB12 positively prepared, justified, effective and consistent with national planning policy?

1.26 No Comment.

M113Q2 What is the justification for stating that a net gain of higher than 10% is strongly encouraged in Policy NEB6? Could this lead to confusion as to what is required from development proposals?

1.27 The Environment Act 2021 requires a net gain of 10%.

M113Q3 Does Policy NEB7 provide sufficient flexibility to account for site specific circumstances?

1.28 No comment.

1.29 No comment.

M113Q4 What is the justification for Policy NEB11, especially criterion b)?

1.30 No comment.

London

T: 0207 459 4549

E: info@urbanissta.co.uk

W: www.urbanissta.co.uk

Birmingham

T: 0121 517 1251

E: birmingham@urbanissta.co.uk

W: www.urbanissta.co.uk

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