St Albans Council
Draft Local Plan Examination
Stage 2 Hearings

Hearing Statement
Matter 3 – Green Belt

Ref: ELP/HS2/M3

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Personal Statement and Declaration

I have a BA (Hons) in Geography and an MSc in Urban and Rural Planning and I am a Chartered Member of the Royal Town Planning Institute.

All the information and evidence in this Statement have been prepared by me and are given in accordance with the guidance of the RTPI and I confirm that the views expressed are my genuine professional opinions.

For the sake of transparency, I declare, first, that my wife is a Council Officer and, secondly, that I represent a number of clients with sites in the District, including Moor Mill Tanker Depot, a PDL Green Belt site.

Brian Parker, September 2025

Issue 1 – Green Belt Review

Q1 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?

Q2 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?

1.1 Please refer to my submission in response to the Council document "Green Belt Previously Developed Land (PDL) – Additional Clarification" (SADC/ED78), i.e. Representation Ref: 380 Smug Oak Lane Limited.

1.2 My submission clearly demonstrates how the Council has misapplied the policies in the Framework such that, incredibly, it made it harder to allocate brownfield land than greenfield land: the polar opposite of "brownfield first".

1.3 **Without a review of all PDL sites in the Green Belt to consider which of them could have been allocated and when, the Local Plan will be neither Justified nor Consistent with National Policy**.

Q4 What is the justification for defining boundaries for those settlements that remain washed over by the Green Belt? Are the boundaries justified and effective?

1.4 Further to my submission at Regulation 19 Stage "Policies LG8 and LG9 – Appropriate Development in the Green Belt" and the discussions at Hearing Stage 1, I have yet to see no explanation from the Council for why certain villages (e.g. Sandridge) have been retained in the Green Belt nor for the irrational boundaries applied to others (e.g. Colney Heath). I will comment again when any such explanations are provided.

<u>Towns are not Villages</u>

1.5 At the Stage 1 Hearings, the Arup Green Belt Review's treatment of many of the District's villages as if they were towns was discussed. The Council's Counsel advised that a review of that approach could be undertaken and the Inspectors explained that they would give further direction if any further work was needed.

1.6 Was further direction given and, if so, what additional work has been undertaken?

Brian Parker
BA MSc MRTPI
September 2025