

# ST ALBANS LOCAL PLAN EXAMINATION IN PUBLIC STAGE 1 HEARINGS

## Response to Matter 3: The Green Belt

Written Statement on behalf of Catesby Estates

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Comment

This document has been prepared and checked in accordance with ISO 9001:2015.

## 1.0 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?**

The Council's response to Q8 of the Inspectors' original questions is supported by Catesby to the extent of paras 8.1 - 8.10 contained in Examination Doc SADC ED32, para 1.2. By way of clarification, para 8.11 of ED32 is not agreed, but this is covered in our response to the other Matters 1 and 2.

### **Q2 In response to the Inspectors' Initial Questions, the Council refers to the application of buffers around settlements to help determine which sites to allocate. Is this approach justified, effective and consistent with national planning policy?**

The Council states in its response to Q9 of the Inspectors' original questions, para 9.15:

*“The site selection method undertook site assessment in terms of its sustainable development potential and establishes whether the site is: (amongst other things)*

- *Located in a Green Belt Settlement Buffer (either 400 metres or 250 metres); the buffers are the most sustainable locations spatially in a broad sense as they are adjacent to the larger settlements which offer best access to a range of jobs, schools, community facilities etc.”*

The Council explains earlier in para 9.7 that:

*“The Green Belt Review Stage 2 Report was undertaken by Arup, who are a leading consultancy in this area of work. Their methodology for Green Belt Review has been supported at several Local Plan Examinations for now adopted Local Plans”*

The use of the 'buffer' methodology by Arup for Green Belt reviews is well known and was presumably a factor in their appointment, with St Albans Council expecting the same methodology to be applied to its own circumstances. However, our concern is that the application of buffers has not been carried out consistently. For example, almost the entire eastern portion of site SA 56 (Windridge Farm) is within the South St Albans buffer, whereas portions of SA 62, 63C and 69 which make a significant contribution to the proposed Local Plan allocation B1 – North St Albans, lie outside the buffer.

This is understandable because when the purpose of the buffer is applied, as explained above, Windridge Farm (SA 56 - eastern section) has a more sustainable location, with better access to jobs, schools, public transport.

It is therefore unclear from any evidence or explanation why the Council should depart from the Study's findings in this instance and choose to allocate a site in a less sustainable location, than an available alternative.

We agree that this general methodology has been supported by Inspectors elsewhere to inform previous now adopted Local Plans such as those at Runnymede and Elmbridge. However, there is no explanation for why the Council is now in some cases setting aside the application of the 'buffer' method for identifying the most sustainable locations in favour of allocating a site where less of the land falls within the 400m identified buffer.

In our view, the ‘buffer’ approach to site selection has received endorsement in other cases but its effectiveness is reduced if it is applied inconsistently and compounded through the lack of evidence as to the reason.

**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?**

The Council confirms in paras 9.3 – 9.5 of its response (SADC/ED32) that new development will generally be concentrated on the basis of the Settlement Hierarchy, and there will be a close relationship between the spatial distribution of site allocations and larger settlements.

However, considering the premier position of St Albans in the settlement hierarchy it is surprising that as a location it only contributes three sites (total 1,749 homes) to be released from the Green Belt in the ‘B’ category, and one of these is Burston Nurseries, somewhat remote from the principal urban area. This amounts to only 41% of the capacity of the ‘broad locations’ (250+ homes), and only 16% of the total local plan housing allocations. The proposed allocations are really only two relatively modest urban extensions at North and East St Albans, and we suggest this is not reflective of, or proportionate with St Albans’ position in the settlement hierarchy. Nor does it create sufficient opportunities for people to take advantage of the social, economic and community infrastructure provided by the City, as identified in the Council’s own assessment, that appears in para 6.2 of the draft Local Plan:

*“St Albans City Centre is the largest and most important shopping centre in the District, with a healthy economy that has a distinctive offer including a wide range of independent outlets, chain stores, retail, financial services, cafes, restaurants and public houses”.*

In the submitted draft Local Plan, the Council has a series of policies aimed at enhancing the role of St Albans as a key, sustainable destination. We suggest that the identification of only two sites of any significance to be released from the Green Belt to provide new housing at St Albans will serve to undermine the achievement of this objective by limiting the potential market for local services and facilities especially when it is acknowledged that there is ‘some leakage of expenditure to other centres outside the District’ (para 6.2). Furthermore, this will prolong unsustainable car-based commuting patterns and undermine the prospects for improvements to transport infrastructure, such as the strategically important HERT, as well as improvements to cycling and walking infrastructure, both listed as priorities under Local Plan policy TRA2.

**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 Housing Trajectory confirms that no broad location or large housing site allocated in the Local Plan is expected to deliver homes until at least 2031/2. We comment in more detail on this under Matter 2, including the use of the term ‘broad locations’. So, it is in fact also the shorter term needs that are critical to be able to be met more effectively. Having said that, as this Local Plan has been submitted for Examination prior to 12 March 2025, para 234b of the NPPF 2024 applies. It is likely that work on a new Local Plan will have to be commenced

immediately, on adoption, in order to address the shortfall in housing provision in this Local Plan when compared to the requirement calculated by the standard method, December 2024 (increased to 1,660 dpa), double what this present Plan is planning for.

In these circumstances, the Council should help to ease this substantial forthcoming increase in demand for housing, and on its own plan-making resources by identifying land to be 'safeguarded' now, in this Plan. This will need to be land currently in the Green Belt as per limits on PDL identified in preparation of the current draft Plan, and for the reasons suggested above, the spatial strategy and settlement hierarchy both point to the allocation of more sites in St Albans itself. This would provide at least some contingency in the event the delivery of key allocated sites being delayed and little weight that could be attached to the Local Plan Review, in its early days. Nevertheless, we believe that there has been insufficient consideration of the principle of using safeguarded land by the Council and no reference to it appears in either the Implementation or Monitoring sections of the Plan, where it might have been expected. The only reference is in relation to the Hemel Garden Communities, where some provision is made for 'beyond the Plan Period'. But these are not different, additional sites, they are already proposed to be allocated and any delay in delivery will just be passed on to these later stages. It is not consistent with the 'safeguarded land' principle and will not operate as any sort of contingency.

## 2.0 Issue 2 – Green Belt Review

### **Q1 How does the methodology in the 2023 Stage 2 Green Belt Review differ from the earlier studies in 2013 and 2014 referenced above**

We welcome the more detailed review of Green Belt land provided in the Stage 2 Green Belt Review, based on smaller parcels and a qualitative assessment of the contribution ('importance') the sub-areas make to the wider strategic Green Belt. This in principle, allows for more balanced judgements to be made regarding the particular characteristics of different areas of Green Belt.

The Stage 2 Green Belt Review considers all NPPF Purposes to be of equal significance, with no 'weighting' of a parcel's Green Belt function. The Stage 2 Green Belt Review also adopts the approach that any Green Belt area scoring 'strongly' for at least one Green Belt Purpose is then considered to meet the assessment criteria 'strongly' overall, and similarly, any area scoring 'moderately' for at least one Green Belt Purpose is considered to meet the assessment criteria 'moderately' overall. This is explained in para 4.5.1 of the Stage 2 Review, under 'Overall Performance'. However, this approach may not necessarily accurately reflect the particular characteristics of different Green Belt sites / sub-areas overall, and how the different functions combine to determine the overall performance of any given area of Green Belt which may be more nuanced. This may have implications for the selection/non-selection of sites and is a matter we would like to return to in the Stage 2 Hearings.

### **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?**

Following on from our comments on Q1, the Stage 2 Green Belt Review recommends sub-areas which have most potential for Green Belt release and require further consideration. This categorisation process recognises that certain sub-areas – which meet one or more of the Green Belt purposes strongly – may still make a lesser contribution to the strategic Green Belt function and should be explored further. This approach, which we support in principle, ensures that even strongly performing sub-areas are not unnecessarily excluded from further consideration (if their strategic function is less important). However, despite this approach – as outlined in Section 4.5 of the Stage 2 Review – it appears that with no apparent explanation for doing so, the Council has proposed some draft allocations within sub-areas that were specifically excluded on the basis that they performed an important Green Belt function. For example, **Sub-areas SA-162 – SA-165 / SA-167 – SA-172 (East Hemel Hempstead)** - The Stage 2 Green Belt Review judged these sub-areas to be strongly performing parcels and most of the sub-areas are considered to play an important Green Belt function. However, an area which combines all these sub-areas is proposed as an allocation.

A further example of inconsistency is provided by – **Sub-areas SA-62 – SA66 (North St Albans)**. In general, this collection of sub-areas was considered to have a strongly unspoilt rural character, and any development would result in disproportionate sprawl and erosion of the gap between St Alban and Harpenden.

The Stage 2 Green Belt Review therefore judged these sub-areas to be mostly strongly performing parcels, and most are considered to play an important Green Belt function.

However, an area which combines all these sub-areas – North St Albans - is proposed as an allocation.

Upon further review of the North St Albans draft allocation, whilst it appears that there are relatively few environmental constraints (as is also the case with Windridge Farm Site / sub-area SA-56), there is a less durable outer Green Belt boundary available in comparison to the Windridge Farm Site. The North St Albans northern Green Belt boundary comprises relatively low hedgerow planting, whereas the Windridge Farm Site benefits from the extremely strong elements in the landscape of the A414 North Orbital Road and associated planting to the south. The North St Albans draft allocation is also less potentially well connected to local transport and community facilities in comparison to Windridge Farm which benefits from relative proximity to Verulamium Park and railway stations.

In our view, there has also been insufficient linkage between the sites that are proposed to be released from the Green Belt, and the delivery of transport improvements.

A more effective strategy would be to allocate sites to the south of St Albans that perform equally / comparably but that will also generate contributions to the funding of upgrades to the A414/ North Orbital Road, or to the delivery of the Hertfordshire Essex Rapid Transit (HERT)1 which is planned along the A414.

Furthermore, the allocation of sites in the south of St Albans could contribute to delivering the improvements to walking and cycling infrastructure identified in the LCWIP which would encourage the use of sustainable modes of transport between Hemel Hempstead and St Albans. The improvements identified in the LCWIP include a long-term aspiration for a segregated cycle route along Hemel Hempstead Road and traffic calming measures along King Harry Lane to provide a safer active travel route. These schemes could be part funded through developer contributions from additional sites allocations in the south of St Albans.

#### **Q4 How did the evidence in the Stage 2 Green Belt Review inform decisions about which sites to allocate?**

It is not clear from the Council's evidence base how the findings of the Stage 2 Green Belt Review have informed decisions regarding draft allocations, and – where there has been divergence from the Green Belt evidence base – why this was justified. Overall, it would be beneficial to consider the findings of the Stage 2 Green Belt Review alongside the overall growth strategy for St Albans and the potential 'fit' with wider objectives. For example, a strategy that seeks to deliver most of the housing in sustainable locations around the existing edges of the main towns, i.e. within the 'buffer' might arguably focus on a site such as Site /sub-area SA-56 where there are no absolute policy constraints; few other / non-absolute policy constraints; an established, durable outer Green Belt boundary (the A414 North Orbital); and good proximity to transport and community facilities.

Finally, it is our view that several of the criteria in the site assessment proforma should not be seen as constraints that weigh against the suitability or sustainability of the site. The proximity to Local Wildlife Sites should be seen as an opportunity to enhance the function of the local designation. Similarly, sites in areas that are likely to have archaeological potential, can be either subject to a recording condition or for local preservation could provide more detailed information regarding the presence of archaeological remains. There



is insufficient discussion in the site selection methodology of the opportunities presented by allocating a particular site. We feel the evidence has been used too defensively and little weight has been attached to opportunities for environmental enhancement.

**Q5 Where the evidence recommended that areas were not taken forward for further consideration, how did the Council consider this in the plan-making process?**

In our view, the answer to this question is, somewhat inconsistently.

It is unclear in the evidence published with the draft Local Plan, how decisions have been made on which sites not to allocate in the plan. There are several sites which received the same recommendations in the Green Belt Study and received similar or better scores in the site proforma than sites actually allocated in the plan. We draw particular attention here to the assessment of each of North St Albans (Site reference M-020 allocated for 1,146 dwellings) and Land at Windridge Farm (SA-56) which is excluded.

Within the site proforma Windridge Farm achieved fewer weak criteria and more medium criteria than North St Albans. Both sites were not recommended for Green Belt release by the Green Belt Study, however North St Albans has still been proposed to be allocated in the Local Plan.

The sub-areas that are combined to cover the North St Albans allocation (SA-62, SA-63a, SA-63b, SA-63c & SA-66) are all 'not recommended for further consideration' because of how they perform against the NPPF purposes, and they are considered to play an important role in the performance of the wider Green Belt. In the assessment of wider impacts there is a recognition that the development of parcel SA-62, or the wider strategic land parcel, would 'represent irregular and disproportionate sprawl of the large built-up area and an erosion of the strategic gap between St Albans and Harpenden'.

On the other hand, the sub-area that comprises Windridge Farm (SA-56), in strategic land parcel 24B, is also 'not recommended for further consideration' as it plays an important role in the performance of the Green Belt. However, the assessment of wider impacts states that if removed in isolation the sub-area SA-56 is unlikely to alter the contribution of the wider SA-141, which lies between Chiswell Green and the A414/North Orbital Road, to the NPPF purposes.

Furthermore, it cannot be ignored that the NPPF 2024 places greater emphasis on the function of the Green Belt as a whole, and therefore when considering the release of Green Belt land at St Albans, it is clear that the release of only parcel SA-56 would have less of an impact on the overall function of the Green Belt than is specified in the St Albans Green Belt Annex Report.

It is clear from the discussion of wider impacts related to the sub-areas in question that there would be less of an impact to the wider Green Belt and less of a perception of coalescence from the release of sub-area SA-56, Windridge Farm. This is an example of how it remains unclear from the evidence published what the Council's justifications have been for allocating, e.g. North St Albans over sites that performed more favourably in the sites assessment and Green Belt Study.

### 3.0 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?**

We refer to and support the Council's 'Conclusions' at para 7 of the Green Belt and Exceptional Circumstances Evidence Paper (GB01.01), and also the Council's response to Q8 of the Inspectors' original questions (SADCED32), paras 8.1-8.10.

We agree that exceptional circumstances exist with the Council facing an acute shortfall in housing supply against identified needs with no other means of substantially boosting housing supply other than through amending green belt boundaries.

The need for more housing in St Albans is acute and without amendments to the Green Belt boundary these needs will not be met. The need for housing in St Albans is so great that it is sufficient to justify amendments to the Green Belt not only to release sites in the weaker performing areas of the green belt but also where land is considered to be meeting the green belt purposes more strongly. This is especially so given the wider social and economic benefits that will arise from these developments, and also where contributions can be made to transport improvements, in South St Albans, for example where no significant sites are at present proposed for allocation.

This situation is only likely to worsen should the transitional arrangements be applied, and the Council will be faced with a requirement to commence an immediate review of the Local Plan, under para 236 of the NPPF. In these circumstances the situation could at least be eased by allocating more Green Belt land in this current Plan, and potentially safeguarding further areas as well.