



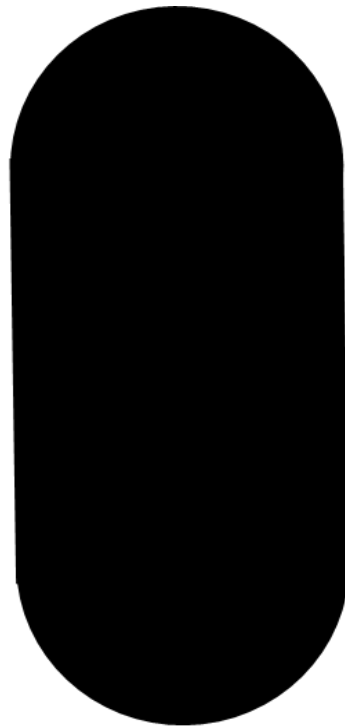
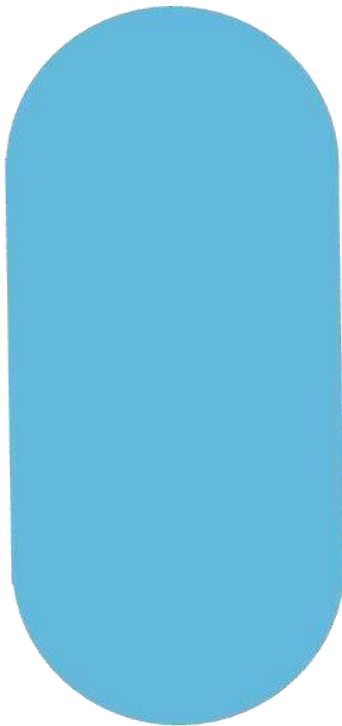
 Part of Shakespeare Martineau

St Albans Local Plan Examination

Matter 3 Hearing Statement

Prepared on behalf of
Martin Grant Homes and Kearns Land Ltd

April 2025



60 Gracechurch Street, London, EC3V 0HR
www.marrons.co.uk

Contents

1.	Introduction.....	3
2.	Issue 1 – Principle of Green Belt Release	4
3.	Issue 2 – Green Belt Review	7
4.	Issue 3 – Exceptional Circumstances	10

Document Management				
Matter Number	Author		Checked/Approved	
Draft	JM	10/04/2025	Client	10/04/2025
Final	JM	10/04/2025	Client	10/04/2025

1. Introduction

- 1.1 This Matter Statement has been prepared on behalf of Martin Grant Homes and Kearns Land Ltd (the Promoters) in respect of Matter 3 relating to St Alban District Council's (SADC) approach to the Green Belt within its Local Plan.
- 1.2 The Promoters have interests in the District at Land to the East of Redbourn, Redbourn (the Site, HELAA reference R-18-21). The Site is identified within the Plan as part of allocation site M6. Representations have been submitted at earlier stages of Plan preparation through Regulation 18 and 19 consultations.
- 1.3 This Matter Statement responds to the Inspectors' questions and have been considered in the context of the tests of 'Soundness' as set out at Para 35 of the NPPF (December 2023¹). These require that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

¹ The Plan is submitted under the transitional arrangements of the NPPF 2024, and as such is to be considered against the NPPF 2023.

2. Issue 1 – Principle of Green Belt Release

Q.1 Has the Council examined fully all other reasonable options for meeting housing needs as required by the Framework?

- 2.1 SADC has pursued a 'brownfield first' approach to site selection, as set out in the Local Plan Site Selection - Proforma Methodology Paper (September 2024) which was underlain by the concept of "leaving no stone unturned" (para 1.4). This was a proactive approach taken by the Council, including contacting landowners of potentially suitable sites.
- 2.2 The outcome of SADC's 'brownfield first' approach has led to circa. 900 dwellings being proposed for allocation on urban sites within the Plan, with a further circa. 140 dwellings on previously developed land in the Green Belt.
- 2.3 This resulted in a significant residual requirement for land to address housing needs outside of the urban area / previously developed land. SADC's position that there is an "insufficient supply of previously developed land to meet the housing need" (Green Belt and Exceptional Circumstances – Evidence Paper, September 2024) is therefore justified.
- 2.4 SADC is tightly constrained by Green Belt with over 81% of the District comprising land in the Green Belt, effectively all the District except for the main built-up areas of the towns and larger villages.
- 2.5 There is, therefore, no reasonable scope for addressing housing needs without looking to the Green Belt. SADC's approach is justified, positively prepared and consistent with national policy.

Q.2 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?

- 2.6 The approach to 'buffers' is as detailed in section 4.2.1. of the St Albans Stage 2 Green Belt Review (June 2023) which states:

The Stage 1 GBR assessed the entirety of the Green Belt in St Albans against the NPPF purposes. In contrast, the GBR Stage 2 feeds directly into SACDC's site selection process. It was therefore appropriate to undertake a more spatially focussed piece of work. The initial area of search was defined by applying a buffer around each settlement inset from the green belt, which would assist in encouraging sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt

2.7 As detailed in the Stage 2 Green Belt Review, there is no formal guidance on how areas of search for Green Belt review should be completed, including approaches to utilising 'buffers'. However, NPPF 2023 para 109 is clear that the planning system should actively manage patterns of growth and significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport mode.

2.8 SADC's approach to the Green Belt has been to balance Green Belt sensitivity with wider factors from a sustainability perspective. This aligns with the Sustainability Appraisal framework topics, most notably accessibility, climate change mitigation, communities and health and transport.

2.9 Further, it is consistent with the Plan Vision and Objectives, including the "key objective" of combatting the Climate Emergency. In this regard, para 5.2.61 of Sustainability Appraisal makes clear:

[the] priority is undoubtedly distributing growth... in order to minimise emissions from transport, including by directing growth in line with:

The settlement hierarchy and to accessible / well-connected locations parts of settlements...

'Sustainable' transport infrastructure objectives...

2.10 The approach to buffers is therefore justified, aligning with the Vision and Objectives of the Plan and the Sustainability Appraisal Framework. The approach has been effective in thereafter identifying a range of suitable and sustainable housing sites to meet needs over the plan-period.

Q.3 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?

2.11 As detailed in respect of Issue 2, below, and Matter 2, SADC's approach to site selection included a range of considerations including the performance of sites / areas against the purposes of the Green Belt and the sustainability of sites.

2.12 Sustainability is evidently a strong objective of the Plan and has underpinned a number of considerations within the site selection methodology, and the vision and objectives of the Plan. This correlates with the settlement hierarchy and spatial strategy, with the focus of the highest levels of growth to the most sustainable locations in the District.

- 2.13 In light of the limited non-Green Belt opportunities which exists across the District, this has, broadly, linked the highest levels of proposed Green Belt release with the most sustainable locations across the District.
- 2.14 This approach is justified, ensuring that opportunities, of all sizes, have not be ruled out purely due to their location within the Green Belt.

3. Issue 2 – Green Belt Review

Q.1 How does the methodology in the 2023 Stage 2 Green Belt Review differ from the earlier studies in 2013 and 2014 referenced above?

3.1 The Inspectors appointed for the Examination of the withdrawn Local Plan in 2020, raised concerns regarding the soundness of the Plan in their letter dated 14 April. Part of this related to the approach taken to the Green Belt, specifically the methodology underpinning site selection and smaller and previously developed land sites:

This approach raises a number of concerns. As part of the fundamental approach stemming from 2013/14, smaller sites (less than 500 dwellings or 14ha) have been excluded from the Green Belt Review and site selection process. This includes the smaller scale areas of land identified in GB004 as contributing least to Green Belt purposes (para 37)

In developing the Plan now being examined, it seems that that any consideration of the potential of such smaller sites has been overlooked (para 39)

In looking at Green Belt releases we have concerns about the narrow focus that has been placed on only strategic sites. This has ruled out a number of sites that have already been found to impact least on the purposes of the Green Belt. It may well also have ruled out other nonstrategic sites with limited significant impacts on the Green Belt which may have arisen from a finer grained Green Belt Review (para 41)

In terms of the contribution they make to Green Belt purposes, it has not been demonstrated whether a range of smaller sites would be preferable to the shortfall sites selected (para 42)

Overall, although previously recognised as a source of housing to be identified at some stage, smaller sites have been disregarded as part of the plan making process. It is our view that this approach has ruled out an important potential source of housing that may have been found to have a lesser impact on the purposes of the Green Belt than the sites selected without sufficient justification (para 45)

As a result of the site selection process outlined above, any PDL site or site in a sustainable location well served by public transport in the

Green Belt below the size threshold has been discounted for consideration. This is so regardless of its impact on Green Belt purposes. This approach fails to give first consideration to PDL land and/or that which is well served by public transport in the Green Belt, and the required process of prioritisation is not evident (para 48)

- 3.2 SADC has changed its approach in light of these comments, including undertaking a new Stage 2 Green Belt Review. This included the use of ‘buffers’ around sustainable settlements (which we considered justified as set out in response to Issue 1).
- 3.3 As detailed in the Stage 2 Green Belt Review (June 2023) the approach continues to reflect and build upon the Stage 1 Green Belt Review Purposes Assessment (November 2013). The Stage 1 Review included consideration of how defined ‘strategic parcels’ and small-scale sub areas contributed towards the fundamental aims of purposes of the Green Belt. This included a rank and scoring. The Stage 1 approach was not criticised by the previous Inspectors and remains up-to-date (with limited development occurring in these areas the interim period).
- 3.4 Section 3.5 of the Stage 2 Green Belt Review indicates how the Stage 1 Review and the Inspectors’ comments have shaped the assessment completed now. This includes:
- Aligning the approach with that completed by neighbouring authorities and wider experience elsewhere;
 - Taking a more comprehensive and granular approach to identifying potential sub-areas to assess within the Green Belt;
 - Both re-considering the weakly performing strategic sub-areas and small-scale sub areas identified in the Stage 1 Review and looking at opportunities for potential release in the wider Green Belt.
- 3.5 We consider this has resulted in a positively prepared and effective approach to understanding where suitable sites of all sizes exist within the Green Belt adjoining sustainable settlements.
- 3.6 The approach has enabled consideration of smaller sites which can positively contribute to housing delivery early in the plan-period, such as that at Land to the East of Rebound.
- Q.3 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?**
- 3.7 The methodology as set out in the Stage 2 Green Belt Review identifies how the conclusions of the Stage 1 Review have been built-upon to come to the proposed site selections and boundary revisions. As detailed in the Stage 2 Review, this includes a “more spatially

focussed” approach which assesses smaller defined ‘sub-areas’ rather than the entirety of the Green Belt. This includes the use of buffers around settlements, which for the reasons set out previously we considered a sound approach.

- 3.8 The process undertaken appears logical, and consistent with an approach which reflects consideration of how areas and sites perform against the purposes of the Green Belt as set out in national policy. Further, it includes consideration of permanent and readily recognisable boundary features in accordance with para 148 of the NPPF.

Q.4 How did the evidence in the Stage 2 Green Belt Review inform decisions about which sites to allocate?

- 3.9 The methodological approach undertaken through the Stage 2 Review concludes with identifying the performance, against the Green Belt purposes, of each sub-area and presents recommendations for which should be progressed.
- 3.10 As set out in Section 8.2 of the Stage 2 Review, the recommendations identify areas which warrant further consideration to be “subject to more detailed assessment and / or consideration in terms of the wider balance of planning factors” and “it will fall to SACDC to further assess the sustainability and delivery of areas of land assessed through the Stage 2 GBR where appropriate, as part of the wider plan-making process”.
- 3.11 The Site Selection Methodology, Outcomes and Site Allocations report (September 2024) further confirms the Stage 2 Review, whilst important in site selection, is “not the only consideration for site selection and other criteria for suitability for the selection of sites in the Green Belt are part of the process” (para 3.8).
- 3.12 Wider comments regarding site selection are covered in our Matter 2 Statement, however, for the purpose of the Stage 2 Green Belt review it is clear this was an important factor in determining the suitability of sites, albeit not the only one.

4. Issue 3 – Exceptional Circumstances

Q.1 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?

4.1 Yes. There is clear evidence to demonstrate exceptional circumstances exist as set out in SADC's Green Belt and Exceptional Circumstances – Evidence Paper (September 2024).

4.2 This highlights the conclusion has been reached on a number of factors including:

- The acuteness/intensity of the housing and affordable housing need.
- The inherent constraints on supply/availability of non-Green Belt land.
- The difficulties of delivering sustainable development without impinging on the Green Belt.
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.
- The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

4.3 The work completed by SADC is consistent with para 146 of the NPPF 2023, including optimising use of previously developed land as much as practicable.

4.4 We consider Exceptional Circumstances have clearly been justified to enable the release of Green Belt land to meet housing needs in full.

4.5 The scale of unmet development / housing needs in the borough that would result from pursuing a non-Green Belt approach only would be wholly contrary to national policy, the Government's ambitions to speeding up housing and affordable housing delivery, and SADC's Plan Vision, Objective and Sustainability Appraisal framework.