

WRITTEN STATEMENT ON BEHALF CREST NICHOLSON
Stage 2 Hearing Sessions – Week 2, Hearing Day 4 (14 October 2025)
Regulation 19 Submission Number: 266

Inspector's Matter 3 – The Green Belt

Issue 1 – The 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?

- 1.1 St Albans District is over 80% Green Belt with its settlements subject to significant heritage constraints and with very little undeveloped or previously developed land in the urban areas. The Council's site selection process first looked at potential development sites within the urban area. This provided for only c. 300 homes per annum against a housing requirement of 885 homes per annum. The Council has identified in its site assessments whether a site is PDL and the extent (as a percentage) specifically looking at PDL in the Green Belt. This assists in understanding the contribution made to overall land supply from brownfield/ PDL sites including those in the Green Belt.
- 1.2 The evidence shows that the extent of PDL on Green Belt sites is limited with few containing more than 20%. A number of these are also detached from settlements and thus, even if containing PDL, would not present a sustainable location for development.
- 1.3 In terms of optimisation of PDL, given the historic character of many areas in the District, and landscape and townscape impacts of higher density development, it will be challenging to deliver developments at densities higher than those already envisaged.
- 1.4 Bringing this together, it can be concluded that the Council has looked to make as much use as possible of PDL, including in the Green Belt. It is plain that there is insufficient PDL and that increasing density further would not be appropriate. Whilst no doubt others will argue the extent to which PDL sites can contribute, greenfield sites in the Green Belt will continue to be necessary to deliver the homes needed in the District.

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?

- 1.5 No comments.

Q3 *Does the evidence demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries?*

- 1.6 SADC sets out its exceptional circumstances for amending its Green Belt boundary in its Green Belt and Exceptional Circumstances – Evidence Paper (September 2024: GB 01.01). This includes acute housing need, limited supply of non-Green Belt land, difficulties with delivering sustainable development without Green Belt land and nature/ extent of harm to the Green Belt.
- 1.7 As set out above (Q1), only c. one-third of overall housing need could be delivered on PDL in the urban areas. This is significantly below the housing requirement, would worsen the already acute need for new homes, exacerbate affordability and continue the trend of under-delivery of affordable homes. Urban development sites also often limit the mix of dwelling sizes that can be delivered, resulting in concentrations of smaller homes when need in the District across tenures is for larger (three-bedroom plus) homes.
- 1.8 We would agree on all reasons that there are exceptional circumstances in St Albans District for amending the Green Belt boundary and that this is the only way the delivery of much-needed new homes at the scale required, and supporting facilities/ infrastructure, can be achieved in sustainable locations that achieve the overall national objective for sustainable development.