
WRITTEN STATEMENT ON BEHALF CREST NICHOLSON

Regulation 19 Submission Number: 266

Inspector's Matter 3 – The Green Belt

Issue 1 – Principle of Green Belt Release (Q2)

- 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. However, all settlements and their communities need to grow, adapt and evolve. There is therefore a logic to SADC's approach of applying a 'buffer' to its settlements to assist its search for suitable and available sites in the Green Belt to facilitate growth and sustainable patterns of development as per NPPF paragraphs 11 and 142.
- 1.2 Whilst this Local Plan is being assessed against the 2023 NPPF, the latest (2024) version of the NPPF introduced the concept of 'grey belt'. This is not a buffer approach per se but land adjacent to existing settlements/ urban areas is more likely to fall within the definition of grey belt and shows the direction of travel in this regard.

Issue 3 – Exceptional Circumstances (Q1)

- 1.3 The NPPF (2023) paragraph 146 required LPAs to explore all other reasonable options for meeting development needs before concluding that exceptional circumstances exist. This includes a) making best use of PDL, b) optimising density and c) discussing whether neighbouring authorities could assist.
- 1.4 As set out above, the District is over 80% Green Belt with its settlements historic with very little available land in the existing urban areas. Given the historic character, high densities in SADC are rarely acceptable. It is plain that there is insufficient PDL and that increasing density would not be appropriate.
- 1.5 Matter 1, Issue 1 discussed the Duty to Cooperate and that discussions on the ability of the local authorities to assist in meeting each other's needs have taken place. As the majority of nearby authorities also have very high proportions of Green Belt, landscape and ecological constraints, none have confirmed ability to assist. This has resulted in SADC and Dacorum seeking to meet their own housing needs.
- 1.6 SADC has therefore met the 'tests' of NPPF paragraph 146 in this regard.
- 1.7 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.

- 1.8 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.