

ST ALBANS LOCAL PLAN EXAMINATION

Matter 2 Housing Growth and Spatial Strategy

Matter 3 Green Belt

Hallam Land and St Albans School

April 2025

1. This Written Statement has been prepared on behalf of Hallam Land and St Albans School (HL&SAS), who are working together to bring forward a mixed-use urban extension at North St Albans. This corresponds with Policy BL1 identified in the Regulation 19 Plan.¹
2. Whilst HL&SAS are seeking changes to that policy to ensure its effectiveness, it has not raised questions of soundness in relation to the matters that are subject to Stage 1 of the Examination.
3. HL&SAS are aware that persons opposed to the North St Albans allocation have made representations in respect of Stage 1 matters as a basis for their site-specific objections. HL&SAS has chosen therefore to make written submissions in response to the Inspectors' Questions.
4. Should the Inspectors consider that HL&SAS's participation at the Examination would assist them, they would be pleased to attend.
5. Where the Questions posed are directed squarely at the Council, we have not sought to answer those.

Contextual Points

6. Unquestionably the administrative area of St Albans has an acute and pressing need for additional housing. It is one of the least affordable places nationwide.
7. There is a demonstrable need to increase the supply of both market and affordable housing. The number of new homes built in St Albans has been below what was termed the *objectively assessed need for housing* and latterly *local housing need* for a great many years. The long-term average rate of housing completions is 396 dwellings per annum.²

¹ Part of the North St Albans Broad Location already has outline planning permission for 150 new homes granted in 2022 and is currently the subject of reserved matters application; the remaining land some - 50 hectares - is that which is promoted by HL&SAS.

² SADC/ED71, Table 2

The long-term average number of affordable homes built is 74.³ This can be contrasted with the levels of need identified in various evidence base documents at the present time.

8. This situation is understandable given there has been no up-to-date Local Plan for almost 25 years. Efforts by the Council to address this in 2014 and 2020 were unsuccessful. Consequently, there has been no plan-led response to the unarguable need to increase the supply of housing land.
9. Of late, a number of planning permissions have been granted that will make a contribution to improving housing supply.⁴ For the most part these were allowed on appeal, but increasingly local decisions are being made as the Council acknowledges the necessity in this regard. Reflecting the fact that there is no realistic prospect of the level of identified need being met on previously developed land, and because the Green Belt effectively encompasses the settlements within and adjoining the District, very special circumstances have often been proven to grant planning permission on such land.
10. However, and importantly, the need for a surety of supply extends into the longer term.
11. The presence of exceptional circumstances required to amend the Green Belt in St Albans has been recognised for at least 15 years from the point at which the Council started work in earnest on a replacement to the 1994 Local Plan. It is simply wrong to assert that sufficient development land can be provided whilst retaining the Green Belt's current boundary.
12. Delivering a sustainable pattern of development is a central tenet of national policy.⁵ It is a principle embedded in the Local Plan's objectives.⁶ In this context, the role and function of the City of St Albans as the pre-eminent settlement in the District is uniquely important.
13. It follows that accommodating development within and adjacent to this settlement is, as a matter of principle, consistent with the overarching premise that new development should be directed to locations that are or can be made sustainable.⁷ It equally follows that amending the Green Belt around this settlement to facilitate this is a wholly sound proposition.
14. This of course is not a new proposition. The District Council has acknowledged this in its two successive draft Local Plans.

³ SADC/ED71, Table 10

⁴ Including Land at Bullens Green; Sewell Park, land south of Chiswell Green Lane; St Stephens Green Farm, Chiswell Green; Burston Garden Centre, Chiswell Green;

⁵ §109

⁶ Table 1.2

⁷ *ut supra*

Matter 2 – Housing Growth and Spatial Strategy

Issue 1 – Local Housing Need

Question 1: The plan period

15. The Regulation 19 Plan refers at various points to the phrase “*up to 2041*”. Paragraph 1.5 refers to the plan cover[ing] the period 1 October 2024 to 31 March 2041. Strategic Policy SP1 refers to: identif[ing] and allocat[ing] land for the delivery of at least 14,603 net additional new houses, or 885 per annum in the period 1 October 2024- 31 March 2041. We understand this to be the plan period. Assuming the Plan is adopted by March 2026, it will cover the minimum 15 year period required by the NPPF.⁸

Question 2: The minimum number of new homes needed

16. Housing need is an unconstrained assessment of the minimum number of homes needed in an area.⁹ The NPPF expects strategic policy-making authorities to follow the Standard Method in assessing local housing need. The Standard Method set out in the NPPG identifies a minimum annual housing need figure. This ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for.
17. This Standard Method calculation was revised in December 2024 in the context of current Government policy. The Government’s intention is that 1.5 million new homes are built in England by 2029 on account of the need to improve the supply of new housing to *inter alia* address prevailing affordability issues. Few places have such poor affordability as St Albans.
18. The Standard Method, employing the March 2025 affordability ratio, generates a local housing need figure for St Albans of 1,658 per annum.
19. This Local Plan is however being examined pursuant to the December 2023 version of the NPPF.¹⁰ That intends that “*the overall aim should be to meet as much of an area’s identified housing need as possible...*”¹¹
20. The NPPG advises that strategic plan-making authorities should:¹²
- (1) Calculate their local housing need figure at the start of the plan-making process.
 - (2) Keep this number under review and revise it where appropriate.
 - (3) Rely upon that figure for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination.

⁸ §22

⁹ Paragraph: 001 Reference ID: 2a-001-20241212

¹⁰ Permissible under the transition arrangements §234b

¹¹ §60

¹² NPPG, Paragraph 008 Reference ID: 2a-008-20241212

21. The Regulation 18 Plan prepared in 2023 included a housing requirement of 15,096 new homes based on a per annum requirement of 888 new homes and a 17-year plan period.
22. The Regulation 19 Plan adjusted this by a small extent to account for the change to the affordability ratio in March 2024 and employs a figure of 885 dwellings per annum. Over the 16.5 years of what is now the plan period, the housing requirement is set at 14,602 dwellings in Policies SP1 and SP3.
23. Accepting that the starting point for this plan is not the current level of local housing need and that it is being examined on the basis of the previous requirement that existed at the time of the Autumn 2024 consultation and the submission for Examination, the Regulation 19 plan does, *prima facie*, meet that level of local housing need.
24. Of course, the transition arrangements also require a review to commence immediately “in order to address that shortfall in unmet need”.¹³ Put another way, the difference between 1658 and 885 each year will need to be redressed and not lost.

Question 3: A higher housing requirement

25. There are various reasons why a greater amount of housing should be provided in St Albans. We have referred earlier to the acute affordability problem that manifests as a high-level need for affordable housing. The fact that a proportion of the affordable housing to be delivered at Hemel Garden Community is to be allocated to the adjoining authority further strains the District’s ability to meet its own needs.¹⁴
26. That said, a significant step change is required in housing delivery to meet just the minimum requirement of 885 dwellings per annum. To revisit Policy SP1 to require the provision of further housing would cause considerable delay in plan making. This would have various disbenefits as regards the primacy of plan led system. Such a circumstance is acknowledged in the letter from the Deputy to Prime Minister to local authorities at the time the revised NPPF was published.¹⁵
27. On balance, having an up-to-date Local Plan in St Albans is unquestionably the cornerstone of improving housing supply locally. Given the historic context there is plainly a particular significance in progressing and adopting this Local Plan and establishing a development plan that provides its many new housing allocations. This would make an important contribution towards meeting as much as possible of present and future needs for the time being. This surety is especially important.

¹³ §236

¹⁴ SADC/ED5

¹⁵ “The plan-led approach is, and must remain, the cornerstone of the planning system. We understand the need to balance keeping plans progressing with making sure they plan for sufficient housing. We are proposing a transitional approach that will allow those local plans that have reached examination to continue.”

Issue 2 – The Housing Requirement

Question 1: The five years post adoption

28. The Plan's housing trajectory is at Table 3.2 of the consultation document.¹⁶
29. For the five years post adoption there are estimated to be 2,941 completions. These are achieved ostensible from existing permissions (1077), windfall (653), some development at Hemel Garden Communities (275), and other small / medium allocations (416), and urban capacity sites (471).
30. In the short terms, the level of completions is not dissimilar to the long term average. From 2029/30 onwards is there a marked increase in supply as new sources come through the Local Plan. Only then is there a significant increase in housing delivery that the NPPF intends.

Question 2: A stepped trajectory

31. On the basis that Policy SP3 should be referring to a minimum housing requirement,¹⁷ were a stepped trajectory introduced into this Policy each cohort would need that same preface. The stepped trajectory should be illustrating the *floor* rather than the *ceiling* for that period. This is especially so in the earlier years of the plan period, where, given the importance of increasing housing supply, every effort should be made to achieve the necessary *significant boost*.
32. The stepped trajectory should not be interpreted or applied as a means to constrain the release of housing sites earlier in the plan period than is assumed in Table 3.2. In that trajectory, the first housing completions at North St Albans are assumed in 2031. Yet there is a very real prospect that development could commence sooner than this and housing completions realised earlier in the plan period. This would have a beneficial effect on housing delivery overall.

Question 3: Which Policy specifies the housing requirement

33. It is not clear which of these two Policies is intended to specify the housing requirement; neither has an apt title in this regard. Moreover, Policy SP1 and Policy SP3 are not consistent.
34. Policy SP1 states:

Following the Government's required 'Standard Method' for calculating local housing need, the Council will identify and allocate land for the delivery of at least 14,603 net additional new houses, or 885 per annum in the period 1 October 2024- 31 March 2041.
35. Policy SP3 states:

This housing need figure is the same as the housing requirement figure of 885 dwellings per year, or a total need of 14,603 in the period 1 October 2024 to 31 March 2041.

¹⁶ Page 26

¹⁷ See response to Issue 2, question 3.

36. Expressed in this way, Policy SP3 frames the housing requirement without the important contextual reference “at least”. This is easily corrected to ensure Policy SP3 is justified and effective.

Issue 3 - Settlement Hierarchy

Questions 1 – 3: The Settlement Hierarchy Study

37. Because the Green Belt is drawn tightly around existing settlements, one of the District’s characteristics is that very little change has occurred since the 1994 Local Plan.¹⁸
38. Where new development has occurred beyond the defined settlements, for example new housing at Sandpit Lane and Oaklands Lane, this has tended to be related primarily to St Albans. In other instances, redevelopment of previously used land outside settlements has occurred, again mostly for new housing. (i.e., Napsbury Park, Harperbury Hospital).
39. Such development has not altered the overall spatial pattern of the District. Certainly, it has not taken away or diluted the pre-eminence of the St Albans as the main settlement.
40. The accessibility audit considered the availability of public transport and active travel, services and facilities and employment. This is understandable given this is a central tenet of national policy. The analysis confirms the role of St Albans as the principal settlement in the District.¹⁹
41. It is right therefore that Policy SP1 intends that:
- “The City of St Albans will continue to be the pre-eminent focus in the District for housing, employment, services, retail, the evening economy, education and healthcare.”*
42. It follows that the distribution of new development should reflect this principle.

Issue 4 – Distribution of Housing Growth

Question 1: The distribution of housing and the settlement hierarchy

43. On the basis that the plan period commenced in October 2024, the number of completions hitherto in the plan period is inconsequential to the overall distribution of development.²⁰

¹⁸ In this sense, the Green Belt has been effective in serving purpose 5; new housing has tended to be on previously developed land and more recently, permitted development employment to housing (Table 5 SADC/ED71 illustrates this pattern over time). A consequence of this a prevalence in one- and two-bedroom flats, or very large houses (Tables 7 and 8 SADC/ED71 illustrates what has been the longstanding pattern).

¹⁹ LACD.13.1 Table 6 and paragraphs 6.33-6.38

²⁰ Table 1 SADC/ED71 gives a snapshot of 2023/2024, underscoring the focus of new housing at St Albans in the first instance.

44. The location of planning permissions is shown in SADC/ED71A. The location of other sites are shown in SADC/ED71. Our analysis of distribution²¹ illustrates the following:

Tier 1	64.5%
Tier 2	12.0%
Tier 3	3.9%
Tier 4	6.6%
Tier 5	9.7%
Tier 6	3.3%

45. Of the 64.5% located at Tier 1, more than half of that is located at Hemel Hempstead.

Question 2: Broad Locations

46. The term “Broad Location” has been used by the District Council since its draft 2014 Local Plan proposed the allocation of large sites. It is not a term that is intended to correspond with or represent the definition of broad location in the NPPF. For SADC they are specific sites with defined site boundaries. Each of the Broad Locations could be referred to as a Site Allocation without any alteration to the intended outcome that these sites are to be developed in the plan period.

Question 3: The distribution of sites by size

47. The largest allocations are proposed at the Tier 1 settlements – St Albans and adjacent to Hemel Hempstead.²² Of the Broad Locations listed, some 75% of the dwellings identified are at Tier 1 settlements, of which 32% are at St Albans, 12% are at the Tier 2 settlement and 4% are at Tier 3. In addition, some 9% are directed to Tier 4 or below.

Question 5: The role of Green Belt and land within the urban area in determining the spatial strategy and distribution of housing growth

48. There are three particular characteristics relevant in this regard. First, the pre-eminent role and function of the main settlement within the District in comparison to others which are of a lesser scale with fewer services and facilities. Second, the overall scale of development that needs to be accommodated. Third, the extent of the Green Belt effectively enclosing all the settlements.
49. Taken together there is an inevitability that land will need to be released from the Green Belt, and the District Council has acknowledged this for many years.
50. The settlement hierarchy has been established on the basis of the characteristics and functions of the various different settlements in the first instance. This rightly affords a priority to the extent to which locating new development within or adjoining different settlements would contribute to a sustainable pattern of development.²³

²¹ Based on existing planning permission of ten or more, Broad Locations, Large Site, Medium and Small Sites, Green Belt PDL, Sites within urban settlements UCS and HELAA

²² See Table 3.1 of the Regulation 19 Plan

²³ Consistent with §74, §109 and §147 of the NPPF

51. Plainly this attributes a spatial priority to how to direct new development. For the settlement hierarchy to genuinely achieve a sustainable pattern of development it has to (1) contemplate a policy off position; (2) judge whether the ensuing pattern would fundamentally harm the purpose of the Green Belt overall; and (3) determine the balance of these two considerations.
52. It is not possible to credibly assert that focusing development in accordance with the established spatial pattern would fundamentally harm the purpose of the Green Belt overall. Whilst there will be encroachment into what is presently countryside, neighbouring towns will not merge. Development can be accommodated in compact forms with high degrees of containment such that they do not represent or encourage unrestricted sprawl. Greenfield development is required hand in hand with urban development in any event. These are notably important considerations that neither detract from or justifying altering the intended strategy.
53. Lastly, turning to the availability of previously developed land as a driver of the spatial strategy, unsurprisingly, the Brownfield Land Register²⁴ indicates that 50% of the area of land identified is associated with St Albans, with correspondingly less sites and areas at other settlements. HOU10.02 provides a visual representation of this. Similarly, the Urban Capacity Study 2022 reveals the largest potential capacity assessed through that process is also at St Albans.²⁵

Issue 5 – Site Selection Methodology

Question 1: Discounting sites at the initial assessment stage

54. HELAA.01.01 states that *“Each site has been assessed for its suitability, availability and achievability. Sites that are not considered to be suitable, available or achievable are not taken forward to site selection.”*²⁶
55. In this context it states *“In total, the HELAA process has identified 678 sites (including the Urban Capacity Study). Of these, 112 sites were not taken forward to site selection. 566 sites will be taken forward to site selection.”* (§5.3 refers)
56. Therein, the methodology describes how suitability, availability and achievability was judged in this process. The discussion of suitability is at §3.17 - §3.23; availability at §3.24- §3.25; and achievability at §3.26-3.27. Notably, §3.3.19 and §3.20 discuss how constraints were treated, whilst §3.21 - §3.22 discuss the Green Belt’s influence in terms similar to those explained in §51 and §52.

Question 2: Sites beyond the settlement buffers

57. Having, rightly, not treated the Green Belt as an immutable constraint in the assessment of site suitability, the Council then assessed the contribution various sites made to the

²⁴ HOU10.04

²⁵ HELAA03.02, Tables 5 and 6 refer

²⁶ §5.2 refers

Green Belt purposes. The term “*spatially focused*” is intended to convey the objective of location being an important component of that assessment and reinforcing the intention to achieve a sustainable pattern of development. This is explained at §4.2.1 of GB.02.02.

58. GB.02.02 illustrates the extent of sites that were considered through the Green Belt Review.²⁷ Contrasting these with HELAA.04.01 indicates that the sites that were not reviewed in the Green Belt assessment are for the most part those that are distant from existing settlements. Development in those locations would be at odds with the established settlement pattern. It would also be contrary to prevailing planning policy as regards the importance of a sustainable pattern of development and the intent that new development is directed to accessible locations well related to existing settlements and their facilities and services.

Question 3 and Question 4: Distances and infrastructure as site selection considerations

59. LP.02.02²⁸ explains that Accessibility measures “*the distances to key infrastructure and services such as public transport, schools, employment, local facilities and GP surgeries*” Table 2 (pages 9 and 10) lists the criteria used to judge relative performance. Distance is a proxy for overall accessibility and the propensity for such locations to be accessible by walking and cycling – those are commonly used measures in this regard. Distance is also the measures used for proximity to public transport with the qualification of at least peak hourly day service. The quantitative assessment derives a score which is importantly supplemented by a qualitative assessment. It is a combination of these two assessments that has enabled judgements to be made as to the sites to be allocated for development.
60. One of the limitations of the quantitative scoring exercise is that it did not recognise what development of a site would realise and how that would affect the scoring. For example, at North St Albans, it is scored *weak* in terms of distance to local centre, access to open space, and *medium* for access to primary school and healthcare, yet these are Policy requirements for the development itself. Factoring these into the assessment would yield a different (and higher) score. Moreover, the qualitative assessment of North St Albans refers to sustainable transport improvements which are in fact related to the implementation of works associated with the priority corridor in the Local Walking and Cycling Infrastructure Plan. These improvements will have a wider utility than simply its future residents.
61. Notable also is the way in which the size of the site influences scoring. M-020 (North St Albans) immediately adjoins C-139 (Sewell Park), yet because the centre of the two sites are physically different they score differently in terms of access to Secondary School. The reality is that as many if not more future residents at North St Albans would be within walking distance to the nearest Secondary School (St Albans Girls School) as would those

²⁷ Figures 4.6 and 4.7

²⁸ §1.26

at Sewell Park and there would be little discernible difference in terms distance to Townsend Secondary School.

62. These are examples that illustrate how judgements and benefits of the proposed development referenced in the qualitative assessment influence the overall outcome.

Question 5: Viability and deliverability

63. Availability and Achievability were factors assessed earlier in the process.²⁹ The Infrastructure Delivery Plan and Schedule provide information as to the likely requirements associated with the proposed allocations along with cost estimates.³⁰ We understand preparing the IDP was an iterative process alongside plan preparation with a symbiotic relationship.

Question 6: The Green Belt Stage 2 recommendations

64. In response to Question 1 we have referred to how the site selection methodology treated the Green Belt status of potential development land.
65. HELAA.01.01 §3.21 states *"Sites and broad locations are not excluded at this stage on the grounds of being located within the Green Belt (as identified in the current 1994 Local Plan). Given the quantum of new development that is likely to be required in the next 15 years there is likely to be a need to identify sites that are currently in the Green Belt for development."*
66. It is not surprising therefore that land not recommended for removal from the Green Belt has still needed to be identified for development. The Green Belt Study's conclusions are only one consideration. The spatial imperatives of national policy, embedded in various of the Local Plan's objectives, to accommodate new development in sustainable locations and reduce the need to travel are especially important. Naturally, for the reasons given in LACD.13.1, and other places, this has leant towards development allocations being identified adjacent to the main settlements, with a balance having to be struck alongside Green Belt function.

Question 8: Is the site selection process robust?

67. The site selection process has been robust.
68. It is to be expected that the sites that have been identified as potential development locations for quite some time still provide the cornerstone of the Local Plan's strategy. The characteristics and merits of those sites have changed little with the passage of time irrespective of earlier Local Plans were withdrawn (for entirely different reasons to site selection). The mainstay sites have been supplemented by additional allocations to add to the Local Plan's resilience.
69. In overall terms, site selection is a matter of analysis, assessment and planning judgement. This balances various strands of national policy and the Local Plan's objectives to achieve

²⁹ Explained at §3.24 - §3.27 of HELAA.01.01

³⁰ INF.01.01 and INF.01.02

an overarching sustainable pattern of development. In this regard the Local Plan is positively prepared, justified and effective.

Matter 3 – The Green Belt

Issue 1 – Principle of Green Belt Release

Question 1: Have all other reasonable alternatives been fully examined?

70. GB.01.01 sets out the District Council's reasoning as to why exceptional circumstances exist to justify amending the Green Belt. We concur with its conclusion.
71. That conclusion is the same as was reached by the District Council in the context of the draft Local Plans in 2014 and 2018. It is also an understandable conclusion where, for some time now, planning permission has been granted in the District because very special circumstances have been proven to exist.
72. One aspect that is not expressly addressed in GB.01.01 is the extent to which the strategy has been informed by discussions with neighbouring authorities as to whether they could accommodate some of the identified need for development.
73. Neighbouring authorities within South West Hertfordshire each have a prevalence of Green Belt. There is a limit in those authorities as to their own development options without encroaching into the Green Belt. To greater or lesser extents, the Green Belt has and will need to be amended across the sub-region.
74. It is not conceivable that St Albans' housing and employment needs could be accommodated in another neighbouring authority without the Green Belt needing to be amended in those locations. Plainly that is not a "*reasonable option*".

Question 2: the use of settlement buffers

75. We have discussed the "*spatial focus*" that the Stage 2 Green Belt Review (GB.02.02) adopted in response to Matter 2 – Issue 5, Question 2. The settlement buffers were deployed to focus attention at sites that were immediately adjacent or within close proximity to a settlement. The consequence is that it did not consider sites that were more distance from those settlements. The overarching premise was to achieve a sustainable pattern of development as described in §4.2.1 therein:

"The initial area of search was defined by applying a buffer around each settlement inset from the green belt, which would assist in encouraging [a] sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt (see Appendix A3.2 for examples of experience elsewhere under this approach).

This approach ensured a proportionate and focussed study. Sites that were not adjacent to existing urban areas (or the buffers) were thus excluded for the assessment on the basis that their release would (a) not contribute to a sustainable pattern of development; and (b) undermine the integrity of the Green Belt by creating hole(s) within its fabric."

76. We agree that this approach is appropriate. This reflects the principles of directing new development to sustainable locations, consistent with national policy and the Local Plan's objectives.

Question 3: How did the Council determine the location of Green Belt releases

77. Given that each of the District's settlements is constrained by Green Belt, the spatial strategy is the principal driver of where its boundary should be amended. The site selection process has then arrived at balanced judgements about which sites to allocate at different settlements. We have identified in our response to Matter 2 – Issue 4, Question 3 the distribution of new allocations across the settlement hierarchy. Excluding the allocations that border Hemel Hempstead, more development is located at St Albans (as a Tier 1 settlement) than in comparison with other lower tier settlements, and rightly so.

Issue 2 – Green Belt Review

Question 1 and Question 2: Methodology

78. The Stage 1 Green Belt Review undertaken by SKM focused on large scale development opportunities, reflecting the District's Council's strategy at that time to allocate such sites as part of the then emerging Local Plan. It considered initially what it termed strategic scale parcels³¹ and then sub-areas within those larger parcels that performed weakly³². This work effectively aggregated fields to consider potential development sites
79. The Stage 2 Green Belt Review instead focus on individual field parcels. For example, what SKM termed GB38 (SA-S4) 'enclosed land at north St Albans along Sandridgebury Lane', Arup subdivided this into four field parcels (SA62, SAS63a, SA66, SA69). Because each field is assessed as a discreet parcel in the Arup Study, they have individual and different functions.

Question 3: Robustness and transparency

80. The Arup Study has not grouped together field parcels to mirror or compare with the SKM sub-areas. Consequently, that Study does not assist with defining new Green Belt boundaries where large-scale development is proposed. However, the SKM Study considered larger sub-areas and considered how the Green Belt boundaries could be redrawn.
81. For North St Albans, those new boundaries are readily apparent – Harpenden Road, Woollam Playing Fields complex, woodland planting and the main line railway. Revising the Green Belt to reflect those physical and natural features are matters that, in this instance, are straightforward.

³¹ see Figure 3.2 of GB02.02

³² see Figure 3.3 of GBR02.02

Question 4 and Question 5: How did the evidence inform site selection?

82. The conclusions of the Stage 2 Green Belt Review represent just one strand of the considerations that went into the site selection process, as discussed in Matter 2 – Issue 5. Planning judgement was exercised to arrive at proposed allocations that, as is evident from GB.01.01, had regard to their likely contribution to sustainable patterns of development as well as Green Belt function.
83. This process gives rise to a number of allocations that include parcels that were not recommended to be removed from the Green Belt in the Stage 2 assessment. This includes North St Albans. Importantly, sites like North St Albans were considered appropriate by the earlier SKM study because of the different and more relevant methodology for larger scale development.

Question 7: Compensatory improvements

84. For North St Albans, the associated Policy includes compensatory provision of playing fields that need to be relocated as well as new and improved routes that enable greater access to the countryside and reflect the County Council's Public Rights of Way Improvement Plan's longstanding objective to create connections to the north of the town and towards Heartwood Forest. This objective is also reflected in the Sandridge Neighbourhood Plan.

Issue 3 – Exceptional Circumstances

Question 1: Do exceptional circumstances exist?

85. Yes, exceptional circumstances exist to amend the Green Belt in St Albans. This has been understood since work on a new Local Plan commenced in earnest 15 years ago. The imperative to improve housing supply in the District and at the main settlement has only heightened as the measure of local housing need has increased over time and again more recently with the 2024 Standard Method.
86. It is unmistakable that present and future development needs cannot be met without encroaching into the Green Belt; there is no credible evidence that those needs can be met within existing urban areas either on previously developed land, or through the intensification of uses and optimising density, or by diverting needs to other neighbouring authorities. Equally there is no compelling argument that the Local Plan's strategy to focus development in accordance with the settlement strategy to reinforce the existing spatial pattern is erroneous; rather it is aligned with national policy to achieve a sustainable pattern of development that is in turn reflected in the Local Plan's objectives to minimise the need to travel.
87. Whilst amendments are proposed to the Green Belt at various locations, viewed objectively, the Local Plan's Key Diagram³³ illustrates that very extensive tracts of land will remain as Green Belt and will continue to serve the purposes afforded to it by the NPPF.

³³ Figure 1.3

In the context of Paragraphs 11(a) and (b) of the NPPF there is a manifestly sound justification to amend the Green Belt and this does not represent a strong reason not to meet the development needs of the District.

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LRM Planning
14th April 2025