

**Redbourn Parish Council**  
**Matter 3 – The Green Belt**

***ISSUE 3 – The Principle of Green Belt Release***

**Q1. Has the Council examined fully all other reasonable options for meeting housing needs as required by the Framework?**

**RPC Response:**

1. The Draft Local Plan (both Reg. 18 and Reg. 19 versions) fail to state what 'exceptional circumstances' there are for proposing the Draft Local Plan sites in the Green Belt.
2. The Council produced a Green Belt Exceptional Circumstances Evidence Paper (September 2024). A detailed examination of this paper outlines several of our serious concerns:
  - a) The paper does not attempt to address any of the three criteria in paragraph 146 NPPF.
  - b) It does not explain how the Council has made as much use as possible of suitable brownfield sites and underutilised land.
  - c) The Council fails to explain whether they have considered optimising the density of development in town and city centres (St Albans or Harpenden) and other locations served by public transport (e.g. London Colney, Park Street, How Wood and Chiswell Green).
  - d) It states that one of the 'exceptional circumstances' is *"The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed"*. This is a confusing statement and is unclear what SACDC considers to be exceptional about the 'nature and extent of the harm to the Green Belt'.
  - e) It is also not clear what is meant by: *"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"*.
  - f) Importantly, the SACDC has not complied with the Government's legal test for discharging its Duty to Cooperate. Local authorities must fulfil the legal requirement to cooperate with the Duty to Cooperate prescribed bodies by *"engaging constructively, actively and on an ongoing basis"*<sup>1</sup> on cross boundary strategic matters from the commencement of preparing the

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<sup>1</sup> Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by section 110 of the Localism Act 2011 (2) (a)

Local Plan to submission of the Local Plan to the Secretary of State for examination. Paragraph 146 NPPF requires discussions with neighbouring authorities about accommodating some of the identified need for development and to demonstrate it in a Statement of Common Ground.

**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?**

**RPC Response:**

3. Please see our response to Matter 2, where we explain that this is not a sound approach to help determine which sites to allocate – as the Inspectors have already raised in their questions for Matter 2, the sites outside of the buffer zones were discounted even before being fully assessed.
4. Furthermore, the proposed Green Belt releases at Hemel Hempstead are held as a 'constant' for all reasonable alternatives in the Sustainability Appraisal without the Council properly assessing / considering other Green Belt locations in the District (including those outside the said 'buffers').

**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?**

**RPC Response:**

5. This will need to be explained by SACDC.
6. The Site Selection Proforma Methodology Paper (GB.01.01) says nothing about the settlement hierarchy or spatial strategy so these do not appear to have been considered. The Local Plan does not even set out the distribution of housing by settlement which is a good indication that it has not factored in the Council's considerations in any detail.
7. At a strategic level it is important to refer to the 'Proforma Summary Table' of the Site Selection Proforma Methodology Paper (GB.01.01) (see below).
8. This raises many questions about the method for deciding where the Green Belt would be released. There were 98 sites Green Belt Buffer Sites that were discounted including 8 that were recommended to be progressed in the GBR.

9. This table does not specify the locations of where these sites are located apart from Hemel Garden Communities. This is inconsistent and does not allow this important matter of where Green Belt sites (and other sites) were discounted in terms of each settlement. This would allow some baseline understanding of how these sites relate to the proposed settlement hierarchy and proposed housing distribution. Furthermore, it would help provide a baseline for what potentially suitable sites have been discounted. SACDC should provide this information.

Proforma Categories	Number of Proformas
<b>Green Belt Sites – Recommended to Progress</b>	
Hemel Garden Communities	4
Broad Locations	12
Large	3
Medium & Small	19
Green Belt PDL	3
Other Sites	4
<b>Total</b>	<b>45</b>
<b>Green Belt Buffer Sites – Not Recommended to Progress</b>	
Green Belt Buffer Part 1	48
Green Belt Buffer Part 2	38
Green Belt Study Recommended	8
Chilterns National Landscape	4
<b>Total</b>	<b>98</b>
<b>Urban Sites – Recommended to Progress</b>	
Urban HELAA	3
UCS	54
<b>Total</b>	<b>57</b>
<b>Urban Sites – Not Recommended to Progress</b>	
Urban HELAA	17
UCS (post Reg 18)	3
<b>Total</b>	<b>20</b>
<b>Overall Total</b>	<b>220</b>

Source: Proforma Summary Table (Site Selection Proforma Methodology Paper (GB.01.01))

- 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?**

**RPC Response:**

10. This does not appear to have been considered by SACDC and is not mentioned in the Local Plan or supporting documentation.

**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?**

**RPC Response:**

1. We question SACDC's decision to reuse the 2013 Green Belt Review Stage 1 as Stage 2 appears to effectively disregard its findings. It was one of the first Green Belt Reviews in the country and consisted of a Stage 1 (Purpose Assessment) and Stage 2 (Site and Boundaries Study).
2. SACDC and its consultants that prepared the Green Belt Review Stage 2 (2023) claim that the 2013 Stage 1 Review was in some way 'endorsed' by the Inspectors who conducted the Examination for the withdrawn Local Plan in 2020.
3. The Green Belt Review Stage 2 (2023) refers to the Post Hearing Letters issued by the Inspectors explaining that their only concerns with the Green Belt evidence were in relation to the Stage 2 (Site and Boundaries Study). Yet when one reads the Inspectors' Letter (14th April 2020) nowhere does it state this. In fact, the Inspectors appear concerned that the Stage 1 Review was conducted *"around the time that the Council was working on the previous SLP. At that time housing requirements were 8,720 (or 436 per annum) and so much lower than the current objectively assessed need (OAN) of 14,608 homes over the plan period"*. They then raise concerns that the Green Belt Review was not re-visited in the context of the much higher scale of need.
4. Over a decade has passed since this first Review was undertaken and the OAN for the District remains as high (14,603 dwellings) and there have been numerous versions of the NPPF since as well as three withdrawn St Albans Local Plans and significant amendments to the December 2024 NPPF. Surely SACDC should have started afresh with a full new Stage 1 GBR.
5. In addition to the changes at the national level, there have been numerous Neighbourhood Plans prepared in St Albans District including the Redbourn Neighbourhood Plan (2023) which would need to form part of a GBR Stage 1 Study yet there is no such opportunity for this due to SACDC's decision to focus solely on a GBR Stage 2.

6. The GBR Stage 2 (2023) appears to have effectively disregarded the GBR Stage 1 (2013) in any case. Arup describes Stage 2 as a "more focused piece of work" whereby they simply drew a buffer around each settlement inset from the Green Belt. A 400 metre buffer was drawn for the main settlements (St Albans, Harpenden, Hemel Hempstead, Radlett, Hatfield and Watford) while a 250 metre buffer was drawn for lower order settlements (Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street / Frogmore, Redbourn, Wheathampstead, Shenley, Blackmore End, Abbots Langley) (Section 4.2.1). It then explains that these areas of assessment within the buffers were refined by taking into account (Section 4.2.2):
  - SKM Stage 1 GBR weakly performing land against NPPF purposes.
  - Promoted sites identified through the Council's site selection work.
  - Non-Green Belt land.
7. It then states that "The full list of eight strategic and eight small-scale sub-areas, (Figure 3.3), that contribute least towards Green Belt purposes as assessed in the SKM Stage 1 GBR were considered for this exercise. However, only those sub-areas that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer (see application of settlement buffers), were taken forward. (Page 23).
8. Stage 2 has also not taken forward the 'Local Purpose' of the Green Belt established in the Stage 1 GBR which is "To maintain the existing settlement pattern'. This purpose is effectively to assess and maintain the pattern of inner band local gaps between 1st tier settlements from 2nd and 3rd tier settlements and outer bands of secondary local gaps which separate 2nd and 3rd tier settlements. Importantly, Redbourn (2nd tier settlement) and the gap between it and Hemel Hempstead (1st tier settlement), St Albans (1st tier settlement) and the gap between Redbourn and Harpenden (1st tier settlement) is considered a 'primary local gap' as illustrated in Figure 7.7 of the GBR Stage 1.

**Q2. How were the areas selected for assessment in the Stage 2 Green Belt Review and what are they based on? How do the areas differ from previous assessments of the Green Belt?**

**RPC Response:**

9. Section 4.2 of the GBR sets out the First Step in the Methodology which is 'Sub-area Identification'. It explains that *"The intention of this step was to identify sub-areas, which might potentially be released from or added to the Green Belt"*.
10. There were three clear tasks as part of this step in the process:
  - Define an area of search through the application of settlement buffers.
  - Identify potential areas or sites within the buffers.
  - Refine sites and area to remove land subject to major policy constraints.

11. It explains that following the identification of sub-areas, the final task was to define defensible boundaries for them.
12. The GBR Purposes Assessment (2013) (see Paragraph 6 'Strategic Parcel Plan') explains that the Strategic Parcels identified were done so by following well-defined physical features and the outer boundary of the study area following the authority administrative boundaries. It explains that the following criteria were used:
  - Boundaries should be aligned to natural or physical features where possible e.g. water courses, prominent hedgerows, roads, railway lines.
  - Boundaries should not split woodland or main areas of trees or existing settlements, existing housing or urban development; and
  - Where large settlements, fully located within the study area adjoin administrative boundaries the parcels fully wrap around the settlement to allow a complete assessment. 66 strategic parcels were then identified.
13. These are contrasting methodologies which makes it difficult to understand how they can be labelled as Part 1 and Part 2 studies as they do not seem to relate well to one another as we have set out in our representations.

**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?**

**RPC Response:**

14. Whilst there is an explanation as to the methodology for 'defining sub-area boundaries' set out in Section 4.3 of the Stage 2 GBR it does not explain, as far as we can see, how each sub area was actually assessed.
15. It also states the following in Section 4.3:

*"Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds eye' views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7)".*

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

**RPC Response:**

16. As we have set out in our representations, the evidence in the Stage 2 GBR appears to not have been used to inform decisions about which sites to allocate with a clear example of this being the sites at Hemel Hempstead.

**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?**

**RPC Response:**

17. As explained above the Stage 2 GBR assessed Sub-Areas SA-167, SA-168, SA169a, SA-169b, SA-170, SA-171 and SA-172 as performing strongly against the NPPF Green Belt purposes. Of these Sub-Areas the GBR recommends that only SA-167, SA-169a and SA-169b should be taken forward for further consideration and there are still concerns raised regarding these Sub Areas in the GBR as set out below. We note that 169a is proposed for release in the Draft Local Plan but 168b is not proposed for release.

18. Sub-Areas (SA-168, SA-170, SA-171 and SA-172) form the Broad Locations North Hemel Hempstead and East Hemel Hempstead (North) and are also assessed as 'Important' in terms of their wider impact on the Green Belt.

19. Given that the two proposed Broad Locations at North Hemel Hempstead and East Hemel Hempstead (North) have not been recommended to be taken forward for further consideration SACDC and the Local Plan should not be proposing these areas for Green Belt release. This should effectively remove these two Broad Locations along with their development assumptions which principally consist of a total of 3,100 dwellings.

**Q6. How was the potential for mitigation considered in the Stage 2 Green Belt Review? Was this considered on a consistent basis for all sites?**

**RPC Response:**

20. Whilst the GBR Part 2 commits to 'Identifying potential boundary mitigation' and explains that the pro forma section (step 7) will be the location for this in the pro formas there does not appear to be such boundary mitigation recommendations or where there are they are generalised. For example, for Land West of Redbourn (SA-3a) it states as its recommendation "*The new boundary would require strengthening*" yet it says nothing more about how it should be strengthened. This is a significant failure of the GBR.

**Q7. Does the evidence consider ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, as required by paragraph 147 of the Framework?**

**RPC Response:**

21. The GBR Part 2 provides considerable policy context and case studies of how compensatory improvements could be used in the District. It states the following in Section 7.6:

*“The Council could consider embedding the need for compensatory improvements into a Local Plan policy, for instance in line with policies to support the principles of improving Green Infrastructure Networks. In order to ensure that compensatory improvements are delivered, PPG sets out that early engagement with landowners and interest groups is necessary.*

*Overall, compensatory improvements must be considered for any release of Green Belt land; improvements may be delivered in different forms as deemed appropriate by the Council with regards to the status of the remaining Green Belt land and in relation to strategic or local green infrastructure needs”.*

22. It includes a ‘Potential Compensatory Improvement Evidence Base table (C.1) in Appendix C listing a number of local strategies and studies. However, these are no recommendations given for actual areas in the District where compensatory improvements might be required due to the potential removal of the Green Belt.

23. The Council’s Green Belt and Exceptional Circumstances Evidence Paper (GB 01.01) states at Paragraph 8.1 that:

*“Where it is concluded that loss of Green Belt land for development is necessary, national policy sets out that compensatory improvements to the environmental quality and accessibility of remaining Green Belt land are expected. This requirement is met through draft Local Plan policy LG6 Green Belt Compensatory Improvements”.*

24. This statement appears to confirm that this important matter has not been given any attention and that SACDC plans to simply leave it to a Local Plan policy to address it through applicants submitting a ‘Compensation Strategy’ rather than the Local Plan setting out a Strategy itself through the Local Plan process.



- Q8. How has the Council considered ‘washed over’ settlements within the Green Belt? Are any changes proposed and/or necessary based on the evidence presented?**

**RPC Response:**

25. These were assessed in the GBR however it determined that they should all remain ‘washed over’.

- Q9. Aside from sites proposed for development, are any other alterations proposed and/or considered necessary to the existing Green Belt boundary?**

**RPC Response:**

26. This is not clear from the Council’s evidence and Local Plan.

***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?**

**RPC Response:**

1. The Green Belt Exceptional Circumstances Evidence Paper gives no evidence of discussions between SACDC and neighbouring authorities regarding meeting development need. It does not include demonstrated evidence of making as much use of brownfield and underutilised land, and there is a lack of demonstration of density optimisation. Consequently, RPC contests that the Council has demonstrated examining fully all reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries.