St. Albans City & District Local Plan

EXAMINATION HEARINGS

Matter 11: The Natural Environment

STATEMENT

By Jed Griffiths MA DipTP FRTPI

On behalf of

CPRE Hertfordshire – the countryside charity

October 2025

Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of CPRE Hertfordshire – the countryside charity (CPREH). It has been compiled in response to an invitation by the Examination Inspectors to participate in the Stage 2 Examination Hearings into the soundness of the St. Albans City & District Local Plan.

2. A full summary of the CPREH response to the pre-submission Local Plan can be found on LPCD 20.03 Regulation 19: Reponses by Submissions (Submission 288). Representations on the strategic aspects of Green Belt policy were made in a further statement to the Stage 1 Hearings (Matter 3: The Green Belt), which were heard on Thursday 1st May 2025. These earlier representations may be referred to as appropriate, but the main thrust of this statement is to address the Inspectors' questions on Green Belt under Stage 2 Matter 11.

Green Belt

3. In its earlier representations on the Local Plan, CPREH has been consistent in its view that the document does not give sufficient prominence to the Green Belt and its key role in protecting the countryside for future generations. The firm statements at paragraphs 3.56 and 3.57 are to be welcomed but they should be set out far earlier in the Plan, coupled to a strategic policy. In terms of Policy LG5 (Question 2), CPREH is supportive. National policy on proposals in the Green Belt, especially since the introduction of "grey belt" criteria, is not sufficiently explicit on the positive opportunities and outcomes which must be achieved when developments are permitted in the Green Belt.

Compensatory Improvements

4. At Stage 1 of the Examination Hearings, CPREH has made it clear that too much land is proposed to be removed from the Green Belt. Nevertheless, where loss of Green Belt land is deemed to be necessary, CPREH agrees that there should be compensatory improvements. In response to Question 3, CPREH supports the thrust of Policy LG6 and the requirements for a compensatory strategy. The suggestion on the incorporation of Suitable Alternative Natural Greenspace (SANG), where appropriate, is welcome. This should not be a mere footnote, however.

5. In terms of timing, the basic elements of compensatory improvements should be established at the earliest possible stages of the development process. For large sites in Part B of the Local Plan, this approach could be embodied in master planning. It could be secured by formal planning performance agreement, as suggested (but not elaborated) in the NPPF. In response to Question 4, CPREH believes that there is no reason why the basic requirements of Policy LG6 should not be applied to the smaller site allocations to be released from the Green Belt. The criteria should be used "to a degree proportionate to the development."

Housing Policy

6. The wording of Policy LG7 is appropriate to this Local Plan, because of the extensive coverage of Green Belt (Questions 5 and 6). The detailed criteria set out in the policy are clearly focused on the provision of affordable housing. Reference to a "made" Neighbourhood Plan is supported. The policy is consistent with the NPPF paragraph 82 on the provision of rural housing for local needs and paragraph 154 (f) on local needs exceptions identified in a Local Plan.

7. Similarly, the insertion of Policy LG8 is appropriate in that it elaborates on the rather bland policy exceptions in the NPPF, particularly paragraph 154 (e). In response to Questions 7 and 8, CPREH believes that the approach to Policy LG8 is consistent in with national policy and provides useful advice appropriate to the local area. The references to Neighbourhood Plans and/or Conservation Area Appraisals are welcome.

Extension or Replacement of Buildings in the Green Belt

8. From the wording of Question 9, there is some scepticism about Policy LG9. In the view of CPREH, the aim of the policy may be justified, but it is too elaborate and, in many ways, confusing. It is suggested that the details should be incorporated into a Supplementary Planning Document (SPD). Policy LG9 would refer to the intention to prepare the SPD, coupled to supporting text.

Jed Griffiths MA DipTP FRTPI

Hertford

8th October 2025