



The countryside charity
Hertfordshire

St. Albans City & District Local Plan

EXAMINATION HEARINGS

Matter 3: The Green Belt

STATEMENT

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On Behalf of

**CPRE Hertfordshire – the countryside
charity**

April 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 One Examination Hearings into the soundness of the St. Albans City and 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: Responses by Submissions (Submission 288). This may be referred to where appropriate during the hearings, but the main thrust of this statement is concerned with Matter 3: The Green Belt. It will be used as the basis for the CPREH contributions to the discussions.

Issue 1: Principle of Green Belt Release

3. The Inspectors refer to paragraph 146 of the NPPF which requires the strategic planning authority to examine all other reasonable options for meeting housing need. In response to Question 1, the Council will state that it has explored all the options. It has completed an Urban Capacity Study and updated the Brown Field Register. The Statements of Common Ground show that the Council has liaised fully with neighbouring local authorities. CPREH considers that much more should have been done, particularly in two areas. First, the “optimising of densities” could have been more fully explored, particularly in the towns with good access to railway stations, public transport, and a range of facilities and services. Second, a more dynamic relationship could have been established with the South West Hertfordshire Joint Strategic Plan, to explore the sub-regional spatial options.
4. With regards to paragraph 147 of the NPPF (Questions 3 and 4), CPREH acknowledges that the Council has attempted to allocate land adjacent to the higher tier settlements in the hierarchy. Not all of these sites may be very accessible to public transport. In matter 2, the use of distance as a criterion was queried by the Inspectors.
5. The application of buffers around settlements has been raised under Matter 2. The technique is not universally recognised and is not mentioned in PPG. As CPREH has pointed out under Matter 2, many of the buffers include, or are adjacent to, high quality countryside which makes a significant contribution to the Green Belt.

6. The reservation of safeguarded land, as described in paragraph 148 c) of the NPPF, has been used previously in Hertfordshire, both in the former County Structure Plan and in Local Plans (“Areas of Special Restraint”). It does not appear that the Council has followed that option. In the light of past experience, CPREH is sceptical. On occasions, these safeguarded areas have come forward much earlier, or have been neglected as a result of the hope value which had been generated. For this Local Plan, with the prospect of an early review, safeguarding land would be entirely inappropriate.

Issue 2: Green Belt Review

7. As noted by the Inspectors, the approach to the Local Plan was informed by the Stage 2 Green Belt Review (Arup, 2023). Earlier studies had been produced by SKM consultants in 2013 and 2014. Stage 1 had provided a strategic view of the performance of the Green Belt over a wide area, including St. Albans. Arup considered it to be a good starting point for their own review. The Stage 2 SKM study had some limitations which are detailed in Part 3.4 of the Arup report. The current Stage 2 Review is considered to have taken a more comprehensive and granular approach to identifying potential sub-areas for analysis within the Green Belt. It is a tried and tested methodology, which has been used in many Local Plan reviews.
8. In response to the Inspectors’ Question 1, the main difference in the methodology was the establishment of “buffers” around the settlements which had been excluded from the Green Belt, as described in part 4.2.1 of the GBR Stage 2 report and on Figure 4.2. The reasoning is clear but CPREH questions whether the decision to establish the buffers has led to the exclusion of sites which are further away from the Tier 1 and Tier 2 settlements.
9. It is clear from the evidence that the Stage 2 Green Belt Review had a major input into the site selection process (Questions 2 – 4). The “comprehensive and granular” approach, however, has a number of flaws which are a result of the amount of detail applied to the study.
10. In CPREH’s view, the analysis of sub-areas and sites against the purposes of the Green Belt could have been shortened. In common with all similar reports for Hertfordshire local authorities, the consultants seem to have overlooked the overriding purpose of the Green Belt, which is to contain the outward sprawl of Greater London.
11. The Arup report, at Part 4.5, describes Step 4: Purpose Assessment of each of the sub-areas, where each was assessed against four of the Green Belt purposes

in the NPPF. In the analysis against Purpose 1, the consultants have used literally the wording in the NPPF, which is “To check the unrestricted sprawl of large built-up areas”. The interpretation of “large-built areas” is depicted in Table 4.4. It does not include London, which is a major omission. In CPREH’s view, this part of the assessment was superfluous.

12. The assessment of Purpose 2 is highly relevant to the City and District of St. Albans. The inclusion of the Tier 2 settlements in the analysis is welcomed, as is the definition of “essential gaps” shown in Table 4.8.
13. From the CPREH perspective, Purpose 3 is perhaps the most important of the four as the Green Belt in St. Albans plays a major part in safeguarding the surrounding countryside from development. The assessment criteria in Table 4.9 are generally to be supported, but the definition of rural character seems to be based on landscape character. Farming and agricultural land quality should be included. In the site allocations, some sub-areas with a high score under Purpose 3 have been included, but this is perhaps a point for Stage 2 of the Examination.
14. The report recognises that Purpose 4 – “To preserve the setting and special character of historic towns” – is an important consideration for this Local Plan. The assessment is diluted, however, because Harpenden has been defined as an historic town alongside St. Albans. Although Harpenden undoubtedly has great historic character, it is of local rather than national importance. The purpose has been a part of Green Belt policy for 70 years – it was introduced to protect historic towns of truly national significance. Green Belts with this purpose were established around Oxford, Cambridge, York, and Chester.
15. There is no doubt that St. Albans, with its Abbey skyline, is a national asset. The criteria set out in Table 4.10 should recognise that factor. The detailed assessment of sub-areas around St. Albans is weak and does not consider the setting in terms of the long viewpoints, particularly from the south, many of which are within other Districts. In CPREH’s view, the importance of St. Albans is greatly underplayed.
16. In response to Question 8, CPREH has studied the “Washed Over Village Assessment”, which is very thorough and is compliant with paragraph 149 of the NPPF. The results and the recommended settlement hierarchy are acceptable. It is important that proposals for development in the washed over settlements are considered against Green Belt policy. This will ensure that any permitted schemes are of a scale and impact appropriate to the existing village or hamlet.

Neighbourhood Plans will also have an increasingly important role in setting detailed policies for smaller settlements.

Issue 3: Exceptional Circumstances

17. On this issue, CPREH's position is clear. To summarise, the Council believes that it has no choice but to remove land from the Green Belt in order to deliver its housing requirement. In the Council's view, these are exceptional circumstances. From the outset, however, the Council failed against the requirement in paragraph 146 of the NPPF in that it did not examine fully all reasonable options. Constraints could have been applied in line with paragraph 11 of the NPPF. Apart from the excluded settlements, the whole of the City & District is within the Metropolitan Green Belt. At the centre is St. Albans, with its Abbey skyline, which is a heritage asset of national interest.

18. Taken together, CPREH believes that these factors are exceptional circumstances. The Council could have made a compelling case for a lower housing figure to be tested at this Examination. This would have relieved the pressures on the Green Belt and the open countryside.

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Hertford

11th April 2025