

**Examination of the St Albans City and District Local Plan
Matters, Issues and Questions for Stage 1**

Matter 3: The Green Belt

**On behalf of Bloor Homes and the Department for Health
and Social Care.**

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The Hearing Statements on behalf of Bloor Homes and the Department of Health and Social Care are made without prejudice to the promotion of the Broad Location Hemel Hempstead North.

Our criticisms and objections to the Plan are not aimed at the allocations per se, but at the Council's approach to housing provision (i.e. the inadequate provision given the latest standard method figure, the track record of housing delivery, the acute affordability issues and the Green Belt review).

As noted in SADC/ED13, the Sof CG was submitted without prejudice to other matters that parties wish to raise during the examination.

1. Matter 3: The Green Belt

Issue 1 – Principle of Green Belt Release

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

Paragraph 146 of the NPPF (December 2023) requires that

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

As noted in our representations to the Regulation 19 consultation in November 2024, in support of the Reg 19 consultation the Council set out a case for exceptional circumstances in the supporting documentation to the draft publication of the Local Plan (**GB 01.01** – Green Belt and Exceptional Circumstances – Evidence Paper).

Pegasus Group agree that exceptional circumstances exist to justify Green Belt release through the emerging Local Plan. The release of Green Belt land is required in order to ensure that there is not a significant shortfall in the supply of housing land over the plan period, and to remedy the evidenced affordability issues within the St Albans district.

However, it is clear that the Council, in preparing the Local Plan, have not fully examined all other reasonable options for meeting the identified need for housing in the district.

Brownfield sites and underutilised land

Whilst the Council's strategy should be, to make as much use as possible (paragraph 123 of the NPPF) of brownfield land, there are other factors to be considered and the NPPF must be read as whole.

Paragraph 147 of the NPPF states:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out 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.”

It should be noted that paragraph 147, aligned with paragraph 146, states that plans should give first consideration to land which has been previously developed and/or is well served by public transport.

A particular example which demonstrates the Council have not fully considered all reasonable options for accommodating housing need is the exclusion of Land at Harper Green (part of the HEELA Ref: STS-33-17 although some of this site has been developed as Harperbury Park, granted on permission in May 2017 and part of STS-34-18 and part of STS-34-21.). Land at Harper Green includes some previously developed land, as it is part of the former Harperbury Hospital, part of which is under development for housing. Together with the existing facilities and services locally, and with additional facilities commensurate with further development, the Harper Green site can provide the opportunity to further support public transport and the existing community. However, this opportunity has not been fully explored by the Council, despite the long history of promotion to the Council through the Local Plan process.

As discussed in the responses to other questions on Matter 3 as set out below, the Council’s chosen methodology in the Stage 2 Green Belt Review has meant that the majority of land within the Green Belt has been discounted from any detailed assessment, because of the reliance on the outcome of the 2013 Stage 1 Green Belt assessment, and the introduction of arbitrary buffer zones around the district’s settlements. As a result, sites (such as Land at Harper Green) comprising fully or partially previously developed land, have been excluded from any detailed assessment. Harper Green is just one of many sites which includes some previously developed land within a sustainable location that the Council’s methodology has excluded without any detailed analysis. This approach does not therefore fully examine all reasonable options to promote the use of previously developed land within the district and

it also fails to “give first consideration” to previously developed land within the Green Belt as required by Paragraph 147 of the NPPF.

Duty to Co-operate

In responding to questions on Matter 1 we have set out concerns in respect of the Duty to Co-operate.

The SoCGs provided to the Examination do not provide enough detail as to how unmet needs from neighbouring authorities (which are known to exist) can be met, with no evidence of discussions with some neighbouring authorities on this topic provided at all. Without this evidence the Plan is therefore not effective, neither is it consistent with national policy and as such does not satisfy the test of soundness.

Green Belt Release to Meet Housing Needs in Neighbouring Areas and provide a Suitable Buffer

Given our objections to Policy SP1 as set out within our Regulation 19 representations and the accompanying Hearing Statement on Matter 2, it is considered that further releases of land from the Green Belt are needed to address some of the unmet needs in neighbouring areas and provide a more significant buffer between the housing needs and housing supply and to seek to address some of highest affordable housing needs in the country.

The assessment provided at *Appendix 1: Economic Overview and Housing Need* to our Regulation 19 representations provided a clear rationale for the emerging Local Plan to go beyond the capped housing requirement (885) identified by the standard method for determining local housing need. An increase above the capped method would not only be consistent with national policy and guidance but would also assist in remedying the acute issues of affordability, affordable housing need, ageing population and economic growth with St Albans. It is therefore not unreasonable that the housing target in St Albans should be significantly closer to the latest standard method figure of 1,657 dpa.

The Council have not fully examined the reasonable (and in our view, necessary) option of proposing a greater level of housing delivery across the plan period than is required by the standard method, and as such fail to have considered all reasonable opportunities. Further, the Council did not consider the ability to meet unmet needs from neighbouring authorities as described above and have so failed to comply with the DTC.

As noted in answers to the questions on Issue 2 below, the fundamental issue with regards to the Green Belt in St Albans, is the Council's approach to the Green Belt Review. This sub-optimal approach to the Green Belt Review, in combination with the issues identified above, means that the Council has not fully examined all reasonable options for delivering the level of housing the district needs. In turn, this means that the plan is not positively prepared (as it does not meet the area's objectively assessed needs), is not justified (as it does not take into account all reasonable alternatives), is not effective (as it is not based on effective joint working with neighbouring LPAs), and is not consistent with national policy (specifically Paragraph 146 of the NPPF).

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?

The Stage 2 Green Belt Review (**GB 02.02**) has been undertaken by ARUP (published June 2023) and seeks to build upon the Stage 1 Review (**GB 03.01 – 03.02**) undertaken by SKM in 2013. The 2023 assessment introduces 250m and 450m buffer zones around select settlements within the district. The methodology of the Stage 2 assessment only considers parcels of land within or adjacent to these buffer zones, with all other sites being knocked out of contention and not considered in detail.

The supporting evidence to the Regulation 19 consultation, including the Site Selection Methodology, Outcomes and Site Allocations Report (**LPSS 01.01**), outlines the Council's justification provided for the introduction of GBR (Green Belt Review) buffers around settlements.

"Green Belt Sites identified in the HELAA but outside of the GBR buffers were not considered to be suitable due to their less sustainable location and because development on such sites would create holes in the Green Belt, leading to fragmentation."

The Green Belt and Exceptional Circumstances Evidence Paper (**GB 01.01**) further adds that the GBR buffers "would assist in encouraging a sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt".

This justification relies on the (faulty) assumptions that:

1. Sites outside of the GBR buffers will always be unsustainable and therefore the Council should not even consider these as potentially suitable for development.
However:
 - Walking distance can be easily achieved within 250m–400m, not to mention cycle and public transport modalities
 - The Council's approach does not take into account the contribution any parcel makes to the purposes of the Green Belt. It is entirely possible that parcels outside of the GBR buffers may make a weaker contribution to Green Belt purposes in a location which either is or can be made sustainable. The use of such sites would be preferable
 - Building on the last point of objection, the primary critique of the inclusion of buffers is that they arbitrarily constraint the assessment of suitable sites in the site selection process, which in turn constraints (potentially to a significant degree) the number of potential homes that can be delivered.
2. The development of sites within the Green Belt and outside of the GBR buffers will always create 'holes' in the Green Belt, which would have a harmful effect on the integrity of the Green Belt. However:
 - The purpose of the Green Belt boundary review process is simply to identify areas within the existing Green Belt which contribute weakly/strongly and therein, which would be most suitable to accommodate development, in the event that the LPA has identified there are exceptional circumstances to warrant the release of Green Belt land. In such circumstances, the weakest performing parcels of Green Belt in sustainable locations should be selected in preference to stronger performing parcels, regardless of their relative location in the Green Belt. Given that the LPA will continue to retain control over the extent of Green Belt boundaries over time, there is no reason to suggest that creating 'holes' in the Green Belt would adversely affect the integrity of the Green Belt to any greater degree than allocating development solely in buffer zones – indeed, if the land which is proposed for release within the buffer zones would more strongly contribute to the purposes of the Green Belt than land which could be released outside the buffers, it would clearly be worse for the integrity of the Green Belt to release the land in the buffers.
 - An appropriate methodology through the Stage 2 Green Belt Review would have ensured that such sites would not be put forward for allocation if a site makes a strong contribution to the purposes of the Green Belt or is in an unsustainable location.
3. Even if buffers were justified in principle, there is insufficient justification for setting these buffers at 250m for the smaller settlements in the district and 400m for the

settlements of St Albans and Harpenden. The Council note that several factors¹ were taken into account, but other than listing these factors and a brief overview at section 4.2.1 of the Stage 2 Green Belt Review, there is no evidence which convincingly explains why 250m and 400m buffers are appropriate.

As a reasonable alternative approach, sub-areas found to perform weakly against Green Belt purposes in the Stage 1 Green Belt Review and all sites promoted through the various 'Call for Sites' exercises 2016–2021 should have been considered within the Stage 2 Green Belt Review, without the implementation of buffers. An assessment as to whether each site is or can be made sustainable can be undertaken on a site-by-site basis, and this would have the potential to identify all sustainably located sites which do not strongly contribute to the purposes of the Green Belt, rather than only those which sit within the arbitrary and overly narrow buffer.

As a result of the introduction of buffers in the Stage 2 Green Belt Review (which directly fed into the site selection process), the plan is not justified (as the introduction of buffers is not an appropriate strategy, and the Council have not taken into account all reasonable alternatives).

Furthermore, as outlined above in our answer to Q1, in failing to consider any other approach to the concept of buffers (e.g. using larger buffers or not applying any buffers) the Council have failed to fully explore all other reasonable options for meeting housing needs as required by the Framework. The Plan is therefore inconsistent with national policy in this respect.

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?

No comment.

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?

¹ Including: Approaches taken in other local authorities with similar characteristics to St Albans; Overall size of the district, density of development and rural/urban character; The settlement hierarchy and local circumstances including settlement pattern and spacing; Extent of the green belt and landscape topography; Requirement for a robust and thorough assessment.

No comment.

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?**

In comparing the Stage 1 Green Belt Assessment to the Stage 2 Green Belt Assessment, the Council's Green Belt and Exceptional Circumstances Evidence Paper (GB 01.01) states:

The Green Belt Review Stage 2 was a more spatially focussed piece of work with the initial area of search 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 (as supported by the NPPF). The GBR Stage 2 (2023) assessed sub-areas, with these sub-areas largely driven by the sites promoted and considered through the HELAA process, along with small sites identified in the previous GBR Stage 2 of 2013.

Whilst the Stage 1 assessment considered the contribution that larger strategic parcels of land made to the Green Belt, the Stage 2 review considered smaller parcels of land and introduced the concept of buffers around some settlements. Within these buffers and adjacent to these, sites would be considered suitable for allocation. This had the effect of immediately knocking out many sites from consideration in the site selection process. Please refer to the answer to Issue 1, Question 2 above for further commentary on the appropriateness of these buffers.

- 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?**

The first step of the Stage 2 Green Belt Review methodology involves identifying sub-areas within which detailed assessment would take place, and outside of which all land would be discarded. This process was centred around the introduction of either 250m or 450m buffers around existing settlements.

The stage 2 Green Belt Review states

“To ensure that the assessment reflects the local context, the areas of assessment within the buffers were refined by taking into account:

- *SKM Stage 1 GBR weakly performing land against NPPF purposes.*
- *Promoted sites identified through the Council's site selection work.*
- *Non-Green Belt land.”*

The above differs from the previous (2014) Stage 2 Green Belt Review (**GB 04.02**), which sought to identify individual potential sites for allocation within the eight strategic sub-areas identified within the Stage 1 as having the weakest contribution to the Green Belt purposes. The key differences between the Stage 2 assessments are set out in the table below.

2014 Assessment	2023 Assessment
Examined Eight Strategic Sub-Areas	Examined Eight Strategic Sub-Areas and Eight Small-Scale Sub-Areas (only if they fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site which is entirely or partially within the settlement buffer)
Did not examine other promoted sites	Also examines promoted sites identified in the call for sites process (only if they fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site which is entirely or partially within the settlement buffer)
Does not take account of non-Green Belt land	Takes non-Green Belt land into account
Included site-specific landscape appraisal and assessment of potential capacity	Does not contain site-specific landscape appraisal or assessment of potential capacity

Whilst Pegasus Group agree that the 2023 Stage 2 study improves upon the methodology of the 2014 study in several ways, and addresses the comments of the examining Inspector in 2019 (prior to that previous incarnation of the emerging Local Plan being withdrawn), the introduction of a buffer is, as explained in answer to the other questions in this Statement, not appropriate and has artificially constrained the quantum of sites that the Council have considered for release from the Green Belt. This may have led to either or both of the following:

1. Land which is preferable for release from the Green Belt over sites proposed for release in the 2023 assessment not being considered.

2. Sites which perform weakly against the Green Belt purposes and may have been suitable for release in addition to those identified in the 2023 assessment not being considered.

In either case, given that the Council have identified there are exceptional circumstances which justify the release of Green Belt land to meet local needs, the Council should have taken every reasonable opportunity to review all potentially suitable sites, and the methodology of the Stage 2 Green Belt Review did not permit this.

Again, the Harper Green site (referenced above and promoted to the Council for many years), is a clear example of a site which makes a weak contribution to the Green Belt being discounted for development entirely due to the Stage 1 findings (which considered much larger tranches of land) and the application of arbitrary buffers at Stage 2. The site specific, detailed body of work that has been provided to the Council for many years in association with the promotion of the Harper Green site, demonstrates that the site is sustainably located and could deliver a range of benefits whilst minimising impact on the Green Belt. However, the Council's Stage 2 GBR which has fed into the site selection process, has meant that Harper Green (and likely many other suitable sites) have not be considered.

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?

Robustness of Approach

The introduction of buffer zones within the Stage 2 Green Belt Review is strongly objectionable, given that there is a lack of justification for the necessity of the proposed Green Belt buffers.

We previously commented on the Green Belt Review and noted the criticisms that the Stage 1 report (undertaken in 2013) received at the last Local Plan Examination. The Council still consider it to be relevant despite these criticisms. The primary issue with the Green Belt Review Stage 1 is that it reached high level conclusions – if the very broad areas of assessment were ruled out at this stage, then smaller areas within were not taken forward for further consideration.

The Stage 2 Green Belt Review has been undertaken by ARUP (published June 2023) “builds upon” the SKM Stage 1 (2013) report which assessed the entire Green Belt. The Council

consider that this assessment provides robust evidence base and have taken the findings of the Stage 1 GBR on the weakest performing GB and used these to form the sub- areas for the Stage 2 study. Consequently, any of the large areas which were not considered favourable then (some 10 years ago) continue to be discounted no matter how marginal and whether the assessment was considered to be well founded or not.

The Stage 2 assessment only considered those sites that fell within or adjacent to the settlement boundary buffer zones. The area of search was thus limited by applying a buffer around each settlement inset from the Green Belt. The intention was:

“encouraging a sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt (as supported by the NPPF). The GBR Stage 2 (2023) assessed sub-areas, with these sub-areas driven by the sites promoted and considered through the HELAA process, along with small sites identified in the previous GBR Stage 2 of 2013.” (paragraph 1.7 of the Site Selection Proforma Methodology Paper (September 2024).

We have previously raised issues with the analysis of the Stage 1 report and as this has not been reviewed, the analysis from Stage 1 has been “rolled forward” into the new Stage 2 report. In addition, the new Stage 2 report is confined to the assessment of sites with the narrowly defined buffers.

The ARUP Stage 2 report sub-divides the Stage 1 recommended areas where appropriate but also identifies additional sub-areas for assessment. However, whilst the additional sub-areas are based on promoted sites, they are only those that are within defined buffers around existing settlements in St Albans and neighbouring authorities.

The introduction of the concept of buffers around existing settlements has precluded the consideration of other promoted sites.

The Stage 2 assessment has been artificially (and overly) constrained as it is confined to those areas within the defined buffers around the existing settlements. Notably, the areas of search were defined by applying settlement buffers, identifying potential areas or sites within the buffers, then refining the sites to be removed from the GB. Consequently, sites that are not adjacent to existing urban areas or the buffers (i.e., those that fell beyond the 250m and 400m buffers were excluded) (paragraph 4.2.1). The justification for the exclusion being that “the release of such sites 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.”

The Green Belt Assessment then goes on to state that:

“The identification of a buffer should not be taken as an indication that this land is necessarily the most sustainable, suitable or deliverable option for any future development. Areas of land which are assessed to perform less strongly against the Green Belt purposes will need to be balanced against wider local plan work to determine the preferred spatial growth option.”

This is a clear contradiction of the Council’s own justification for the inclusion of buffers – i.e. that the use of buffers would inherently identify land in the most sustainable locations, whilst ‘weeding out’ land in the least sustainable locations. Accordingly, the extent to which land falls within a buffer should not be the determining factor in considering the area for future development.

As stated in paragraph 4.2.1 of the Stage 2 assessment, there is no formal guidance on how to identify appropriate buffers, and it is noted that the Council have taken into account approaches in neighbouring authorities with similar characteristics and making adjustments for the local context, applying professional judgement.

These buffers, in theory, indicate the maximum extent of sustainable development and vary accordingly to the position of the built-up area in the settlement hierarchy (the justification for the buffers is set out in paragraph 4.2.1). It is noted that the buffers were also applied to the immediately adjacent settlements in neighbouring authorities, where the buffer would lead to some partial interception with SACDC Green Belt, as set out on page 24 of report.

It is noted that in order to ensure that the assessment reflects the local context (paragraph 4.2.2), the areas of assessment within the buffers were refined by taking into account:

- SKM Stage 1 GBR weakly performing land against NPPF purposes.
- Promoted sites identified through the Council’s site selection work
- Non-Green Belt land.

Following the SKM Stage 1 Report, “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 were taken forward” (page 23). Similarly, although the promoted sites from 2016 – 2021 were considered, only those promoted sites “that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer were taken forward” (page 23).

The application of the settlement buffers has resulted in only those areas and sites falling entirely or partially within the defined buffers being subject to further assessment. Where weakly performing sub-areas and promoted sites were located partially within a settlement buffer, the entirety of these areas and sites was taken forward for further consideration, i.e., essentially extending the buffer.

Areas or sites located outside of the settlement buffer fell into two categories:

- Outside the buffer and no immediate adjacency to an area / site within the buffer. These areas or sites were discounted from further consideration – this includes the above referenced Harper Green site, as one example. It is not clear why a buffer was not defined around Harperbury Hospital/Haper Green as a settlement.
- Outside the buffer but adjoining areas or sites located within the buffer. These areas and sites were included for further assessment. In this instance, this was limited to one site extension outside of the buffer.

It is noted in paragraph 4.2.3 that although a “filtering process to remove weakly performing areas or promoted sites, which were entirely or largely constrained by major policy constraints was undertaken. These policy constraints effective rule out development of the land” (paragraph 4.3.2 of the Stage 2 GB Report and are listed including Historic Parks and Gardens). Parcel GB31 (SA-S7), land south and west of London Colney, is constrained by Historic Parks and Gardens as shown at Figure 4.5 of the Stage 2 report, however, the proposed Broad Location B6 West of London Colney appears to lie directly south of the Historic Parks and Garden (the proposed allocation includes land for a 8 FE secondary school site with adjoining HCC land ownership and lies outside the 250 buffer). It therefore appears that there is inconsistency between the stated methodology and the way that this has been applied in practice.

Our main concern is the reliance on the Stage 1 report of 2013, which underpins the Stage 2 report and as a result, the application of the buffers

A Suitable Method

We agree that there are exceptional circumstances to justify releasing land from the Green Belt, however, we have consistently maintained objections to the methodology and site selection process that the Council has applied.

Our fundamental objection is that the Stage 1 GB report of 2013 is relied upon and that the Stage 2 report relies on the buffers around settlements which excludes sites which are sustainable. There is insufficient justification for the buffers.

The GB assessment has been constrained by what appears to be arbitrary buffers, this has resulted in only those sub-areas that fell entirely or partially within the settlement buffer, or immediately adjacent to other areas /sites entirely or partially within the settlement buffer being taken forward.

We suggest that the buffers introduced within the Stage 2 Green Belt Review should be removed, as there is no robust justification for their inclusion. Instead, the Council should review each parcel of land within the review on its own merits, assessing the significance that parcel plays in the role of the Green Belt. This approach would avoid the exclusion of potentially suitable sites within the arbitrary buffer areas and could likely accommodate additional development in sustainable locations.

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

No comment.

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?

No comment.

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?

No comment.

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?

Paragraph 147 (December 2023) states that Plans should set out 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 the remaining Green Belt. This could include new or enhanced green infrastructure, woodland planting, improvements to biodiversity and new or enhanced walking and cycling routes, improved access to new/enhanced or existing recreational provision.

Throughout the preparation of the Local Plan, Pegasus has promoted land at Harper Green. A number of options have been promoted from a new community, such as a previous proposal for approximately 470 dwellings set within extensive green infrastructure (64.06 hectares as illustrated in the Green Infrastructure Plan. We are now proposing a smaller scheme of approximately 200 dwellings which would assist in meeting the shortfall in housing land supply in the early years of the plan.

There will be wider benefits to the existing local community in terms of the parkland and open space and green infrastructure.

The site is located in the Green Belt, but the extensive land ownership provides the opportunity to create a new definitive permanent boundary for the Green Belt and at the same time recognises the need to preserve the gap between existing settlements. The site provides the opportunity to contribute to the existing pattern of small settlements located in the Green Belt, whilst still maintaining the separation between settlements.

We have demonstrated through our evidence submitted to the Council that development at Harper Green adjacent to the former Harperbury Hospital site will enable housing needs to be met in a sustainable location and at the same time a substantial amount of community gain will be achieved. A settlement in this part of the district would contribute to the existing pattern of small settlements located in the Green Belt, whilst still maintaining the separation between settlements.

The landownerships provide the opportunity to create a new, well-defined and permanent green edge to the new community to ensure that the new community is well contained and that the physical separation with Radlett and Shenleybury is protected. There are opportunities to create a natural defensible boundary that could be enhanced through strategic landscaping.

We have demonstrated in previous submissions to the Council how land at Harper Green would provide suitable compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

The above demonstrates that the Council by entirely eliminating Harper Green (and doubtless other similar sites not located within the arbitrarily defined buffer zones), they have missed opportunities for the compensatory enhancement of the Green Belt.

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?

No comment.

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

No comment.

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?

No comment.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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