
**Examination of the Submitted St Albans
City & District Local Plan**

STATEMENT FOR STAGE 2 HEARINGS:

MATTER 3 – THE GREEN BELT

WRITTEN STATEMENT

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On behalf of:

Linden Wates (Bricket Wood) Limited

September 2025

WBP Ref: 9030



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September 2025

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Executive Summary

Linden Wates (Bricket Wood) Limited have a controlling interest in a sustainably located and deliverable site at the former HSBC Training Centre, Smug Oak Lane, Brickett Wood (referred to as Hanstead Park) which is available to contribute to identified housing in the early years of the plan period.

The wider site has planning permission for residential development and is presently being delivered. In granting permission, it was established at appeal that the whole site has brownfield/ Previously Developed Land (PDL) status and that development would not cause encroachment into the countryside (due to the site's developed character as a former training campus in parkland setting). This PDL status, along with the limited contribution to Green Belt purposes and its sustainable location mean that this site is suitable for additional residential development.

However, the approach taken by the Council failed to fully consider the scope for development of such sites in the Green Belt – despite the NPPF (December 2023) identifying such as land being a primary focus for meeting housing need (paragraph 147).

Linden Wates (Bricket Wood) Limited, as detailed in the representations, have concerns with the failure to ensure sufficient housing growth (in terms of the overall housing target in Policy SP1) and the failure to identify and allocate sufficient land to meet housing needs. Accordingly, additional site allocations should be identified. The objections may be summarised as follows:

- The Plan is **not positively prepared** in so far as the proposed strategy for growth will fail to deliver the identified housing need. It should plan for the at least 885 dwellings annually over a minimum 18 year plan period from April 2024 until March 2042; &*
- The Plan is **not consistent with national policy** having regard to the obligation to provide a strategy for at least 15 years post adoption.*

The failure to provide sufficient deliverable site allocations will serve to frustrate attempts to address key factors affecting worsening affordability and denying people the opportunity to own their own home, contrary to Government policy under paragraph 60 of the NPPF which is seeking to significantly boost the supply of housing to address the current housing crisis.

The land at Hanstead Park should be included as an allocation in policies LG4 & LG8 for around 60 dwellings.

The above changes are necessary to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF (December 2023)¹.

¹ Paragraphs 234 and 235 of the 'current' NPPF (Dec 2024) states that Local Plans submitted for examination before 12th March 2025 will be examined under the relevant previous version of the NPPF.

CONTEXT AND BACKGROUND

- 1.1. This Statement has been prepared by Woolf Bond Planning Ltd on behalf of Linden Wates (Bricket Wood) Limited and addresses several questions posed for Matter 3 of the Stage 2 Hearing Sessions as set out in the Inspector's Schedule of Matters, Issues and Questions for Stage 2 ("MIQs") (SADC/ED84).
- 1.2. In setting out our response, we continue to rely upon the content of our detailed Regulation 19 representations ("our Representations") submitted on behalf of Linden Wates (Bricket Wood) Limited in response to the Regulation 19 consultation on the Draft Local Plan on 7th November 2024 and our submissions made to the stage 1 part of the examination.
- 1.3 As set out at footnote 1 on page 2 above, the Local Plan is being examined for consistency against the December 2023 version of the NPPF. Accordingly, all references to the NPPF in this Statement relate to that version (unless otherwise stated).
- 1.4. Our answers to the questions should be read in the context of our position that insufficient deliverable and developable land has been identified in the submitted Local Plan in order to contribute towards addressing unmet needs of neighbouring authorities (NPPF paragraph 61) together with ensuring the strategy extends for at least 15 years after its adoption (NPPF paragraph 22).
- 1.5. The Plan would not be sound without modifications to include:
 - Amending the Plan period so that it covers full monitoring years and extends until March 2042. Since full information on sources of supply relate to the position at 1st April 2024 is now available (SADCED71A and

Paragraph 230 of the preceding NPPF (December 2023) indicates where a plan was submitted after 19th March 2024, they will be examined under that version of the NPPF. Where the Plan was submitted on or before 19th March 2024, they would be examined under the NPPF (September 2023).

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HOU01.01), the logical plan period would be April 2024 to March 2042;

- Additional site allocations are made to ensure that the minimum housing requirement (885dpa) is achieved over the extended plan period; &
- Small and medium sites are allocated in particular to avoid the need for a stepped housing trajectory.

- 1.6. This Statement amplifies our Representations and references are made to that document where relevant.

MATTER 3: THE GREEN BELT

Issue 1: Green Belt Review

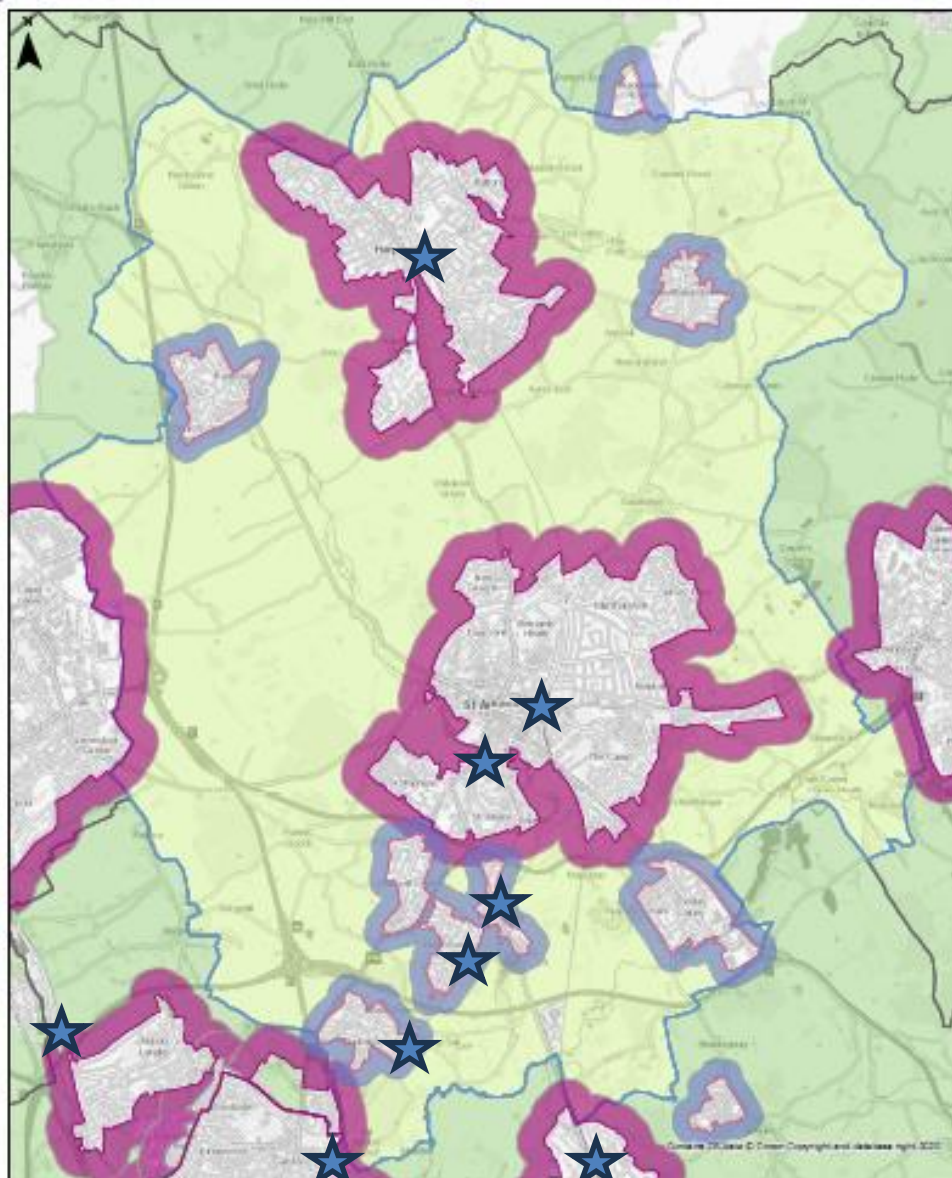
7. Following the Stage 1 hearings, the Council published and consulted on new evidence relating to the alteration of Green Belt boundaries. In particular, this considered how previously developed land was considered in the site selection process.

Question 1: With reference to paragraph 146a of the Framework, has the Council adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land?

- 2.1. No. As indicated in our representation and the statements to the Stage 1 hearing sessions (in particular Matter 2, Issue 4, Matter 2, Issue 5 & Matter 3, Issue 1); the approach of the Plan has failed to maximise the use of suitable brownfield sites and under-utilised land. An illustration of this is demonstrated by the omission of the site at Hanstead Park (also known as the Former HSBC Training Centre). As our representation indicated, the Secretary of State in the appeal decision confirmed the previously developed status of the whole site. Whilst the appeal permitted the redevelopment of the site consistent with paragraph 89 of the NPPF (as it was at the time), this did not negate the wider potential of the land for consideration under paragraph 146(a).
- 2.2. Our response to question 2 below details the reasons why the Council has failed to adequately demonstrate this. It is important to emphasise that 146(a) does not distinguish between previously developed sites in locations inset from the Green Belt or washed over areas. The latter is included as an appropriate location consistent with 154(g) and as indicated in the representation and the statement, the Council has arbitrarily excluded previously developed sites (such as Hanstead Park) primarily as it was beyond the unjustified minimal buffer defined around the settlement of Bricket Wood. Our response to question 2 below further indicates the inconsistency of the Council's approach with national guidance that results in a Local Plan that both fails this test of soundness, alongside not being positively prepared.

Question 2: Does the additional evidence adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously-developed and/or is well-served by public transport?

- 2.3. As indicated in our response to the further evidence on this matter published by the Council (and considered in detail in our Stage 1, Matter 2 & 3 statements), we are of the clear view that the plan is not consistent with paragraph 147 of the framework.
- 2.4. Of particular relevance is the arbitrary use of either 400m or 250m buffers around existing Green Belt settlements. As our stage 1 submissions and the debate during the stage 1 hearings indicated, the distances selected by the Council (400m or 250m) neither take account of the clear advice in the NPPF regarding differential accessibility to services between urban and rural areas (paragraph 147) nor that typically a walk of 10 minutes (equates to 800m) can readily be regarded as appropriate in determine access, especially to key public transport nodes such as railway stations.
- 2.5. The Council's Green Belt Assessment (2023) (figure 4.2) included the application of the buffers of 400m or 250m around each of the settlements in the District. However, the application of the buffers did not consider the accessibility of the District to transport nodes such as railway stations. An annotated version of Figure 4.2 is extracted below and highlights the locations of railway stations across and adjoining the District. In particular the number of stations which lie on the route between Watford Junction and St Albans Abbey is notable.



Annotated version of Figure 4.2 of the 2023 Green Belt Study including railway stations (shown with a star)

- 2.6. The annotated version of Figure 4.2 (above) illustrates that stations are not centrally located within the settlement areas inset from the Green Belt. Consequently, for many areas, land in the Green Belt would be closer to the station than existing parts of the settlement. This is a further illustration that the Council's approach to applying arbitrary buffers to the inset areas rather than considering distance from stations is inconsistent with the clear advice in NPPF paragraph 147.
- 2.7. As a further example, journey times from Bricket Wood Station to both St

Albans Abbey and Watford Junction are 10 minutes. The other stations on this service will have comparable journey times. Whilst the submitted Local Plan (paragraph 3.19) references NPPF guidance on considering the potential of locations well served by public transport, none of the Green Belt Reviews undertaken have defined this in the context of St Albans City & District and then grappled with its implications².

- 2.8. In the absence of this, minimal journey times along the St Albans Abbey to Watford Junction railway line and a frequency of services are such that any station along this service should be considered a focus for growth pursuant to paragraph 147. Such a position is consistent with that indicated in the Council's "Local Plan Site Selection Proforma Methodology" Paper (2024) (LPSS 02.02) which treats access to any railway station in the district equally³. The Methodology Paper also indicated that sites within 1,000m of a railway station had strong accessibility.
- 2.9. Whilst the Methodology Paper indicates that this was the approach, it has not been applied in the context of Green Belt locations and through the robust application of NPPF paragraph 147.
- 2.10. As detailed in our stage 1 statements, the Hanstead Park site was not assessed in the Stage 2 Green Belt review and the reasons for not being included in any sub-area are not entirely clear.
- 2.11. A complete assessment (not limited to the identified buffers) of the Green Belt function of all PDL and / or sites benefiting from good public transport links should have been undertaken so as to satisfy the requirements of paragraph 147 NPPF. Had this occurred, our client's site would have performed favourably for the following reasons:

² The November 2013 Assessment (GB03.01 & 03.02) does not reference public transport services. The February 2014 Study (GB 04.01) references the service frequency on the St Albans Abbey to Watford Junction line (see paragraph 10.3) in determining specific sites but does not appraise this more generally. The 2023 report (GB02.02) references public transport (A.1.1.4) but there is no definition of the service quality.

³ See second and third rows of table on page 9.

- Purpose 1: to check unrestricted sprawl of large built up areas: the site is not at the edge of a large built up area, so it plays no role against this purpose.
- Purpose 2: to prevent neighbouring towns from merging: the sub-area to the immediate north (SA-120) was said to be a less essential part of the gap between Bricket Wood and How Wood and between Bricket Wood and Radlett; and the gap is of sufficient scale that removal of SA-120 (the sub-area north of our client's site) would not result in merging. A similar conclusion is warranted in respect of our client's site.
- Purpose 3: to assist in safeguarding the countryside from encroachment. At the 2016 appeal, the Secretary of State concluded that there would be no encroachment into the countryside via redevelopment of this site, as it is a campus with parkland setting which is wholly PDL. Development would be encompassed within the extent of the campus such that no countryside land would be developed.
- Purpose 4: preserve the setting and special character of historic towns: the GB study concluded that SA-120 provided no role in this regard so a similar conclusion is warranted.

2.12. Further, the identification of our client's site would reflect the 138 dwellings now constructed at Hanstead Park and consistent with the detail shown in the site image (provided underneath paragraph 6.59 of the Regulation 19 representations) would create a Green Belt boundary that uses the physical features of Drop Lane in a way that would ensure a future Green Belt boundary that would be permanent and predicated upon a physical feature, consistent with NPPF paragraph 148, part (f).

2.13. Finally, the site is just 800 metres from a railway station (with bus service connecting to the same and servicing the development) and was discounted at a very early stage of the process (2021) without detailed consideration. It was then not included in any Green Belt sub-area assessed in the stage 2 review.

2.14. The inconsistency in the Council's approach is further evidenced by the point that 3 PDL Green Belt sites listed in LPSS02.07 are recommended for

allocation. 2 of those 3 sites are situated in the Green Belt beyond the relevant 250m / 400m buffers. Paragraph 3.13 of the Site Selection Methodology report (LPSS01.01) states that Green Belt sites beyond the buffers "were not considered suitable due to their less sustainable location and because development on such sites would create holes in the Green Belt leading to its fragmentation." Despite this, 2 were recommended to progress in the LPSS02.07 (and are shown as PDL Green Belt Site Allocations on the Policies Map / Policy LG4).

- 2.15. In accordance with paragraph 147 NPPF, the Council should first have given consideration to sites which are PDL and / or those which are well served by public transport. Yet the Hanstead Park site was excluded at the initial HELAA stage (2021) based on an error. It is further excluded by virtue of the Council's approach to focus upon sites only within the 250 or 400 metre buffer of identified Green Belt settlements and its failure to consider large developments that have occurred since 1994 in its settlement hierarchy study Part 1 (LPCD13.01) (as detailed in our Matter 2 statement). In summary, the Council's combined approach to looking only at the 250 / 400 metre buffers, alongside an insufficient settlement hierarchy review have resulted in a failure to comply with paragraph 147.
- 2.16. The Hanstead Park site plays no strong Green Belt purpose, is PDL, and is sustainably located with good public transport access. It should have been given **first consideration**. However, the Council's methodology has meant such priority has not been given. In simple terms, the Council appear to have discounted PDL (and well served by public transport) Green Belt sites simply because they are in the Green Belt (i.e. not suitable for development under GB policy as it was at the time). A comprehensive further review of sites as would assist the plan in being found such sound by enabling earlier housing delivery from smaller sites and therefore achieving a plan that is more justified, effective and consistent with national policy.

Question 3: Does the evidence demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries?

- 2.17. As indicated in the representations, the District's housing needs provide strong justification for demonstrating the exceptional circumstances to alter Green Belt boundaries. However, for the reasons detailed, the Council's approach has not confirmed the reasons why its approach has departed from Government guidance (especially in NPPF paragraph 147 which emphasises the role of previously developed and/or locations well served by public transport). We have also evidenced that the Council's housing needs will not be met through the current strategy as proposed and require the addition of further site allocations (see statements in relation to other matters).
- 2.18. Whilst the Plan includes Green Belt boundary changes for which exceptional circumstances can be demonstrated, it fails to boost supply in the short term or demonstrate that it comprises a positively prepared document. Our stage 2, matter 2 & 9 statements evidence that the plan will fail to meet its identified housing needs or include sufficient flexibility.
- 2.19. The NPPF (paragraph 8) emphasises that an integral part of demonstrating the achievement of sustainable development is meeting the present needs at the right time. Had the Council's approach actively considered other opportunities for delivery, especially in the short term, the necessary exceptional circumstances to justify Green Belt boundary changes (and meet housing needs) would enable a more positively, prepared, justified and effective plan.

8. The application of some Green Belt policies (such as Policy LG8) rely on the Council's proposed boundaries to Green Belt settlements as shown on the policies map.

Question 4: What is the justification for defining boundaries for those settlements that remain washed over by the Green Belt? Are the boundaries justified and effective?

- 2.20. This issue is responded to in our response to stage 1, matter 2, issue 3 and matter 3, issue 2, question 8.

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- 2.21. The assessment of Washed Over Villages (GB02.04) is limited to the existing defined settlements. As detailed in relation to stage 1, matter 2 (Settlement Hierarchy), the former HSBC Training Centre site (Hanstead Park) should have been reviewed and included as a Green Belt village as part of the Settlement Hierarchy review. This developed site is washed over but has permission for 138 homes with further capacity to accommodate additional development (circa 60 dwellings as detailed in our Regulation 19 representations on behalf of Linden Wates (Bricket Wood) Limited).
- 2.22. The methodology in the Washed Over Villages review (GB02.04) is to consider the Green Belt function of each settlement and the degree of openness/visual containment. Based on that approach, had our client's site been reviewed, it would have been found to serve little Green Belt function and have a reduced degree of openness. When granting permission to redevelop the site, the full extent of 'headroom' (in terms of volume or floorspace of built form) was not re-provided. When granting permission for redevelopment in 2016, the Secretary of State concluded that the 20.54ha site, in its entirety, comprises previously developed land. Further, it was concluded that redevelopment would involve no encroachment into the countryside, as the former training centre campus and parkland grounds did not have the character or function of countryside. The site serves no strong Green Belt function. There is a degree of visual containment, particularly to the west, which would limit views of the part of the site which is promoted for an additional 60 dwellings. The site should be inset from the Green Belt but the Council has given no consideration to the possibility or merits of this approach.
- 2.23. As a further contextual example, section 4.11 of the Council's Green Belt Review Report (02.02) identifies that washed over villages should be inset from the Green Belt where a village either has an open character but does not make an important contribution to openness or does not have an open character at all. Logically, any village of a reasonable density and close knit in character will comprise a built/developed context and therefore not make an important contribution to openness. The Green Belt review: Washed Over Villages Report (02.04) identifies 10 settlements and concludes that 9 of these make an

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important contribution towards the openness of the Green Belt and should therefore be retained as washed over. One settlement (Radlett Road & Frogmore) isn't identified to do so and is recommended to be inset from the Green Belt. However, even that settlement is not inset from the Green Belt on the submitted Policies Map. As illustrated at paragraphs 6.60 to 6.61 of our Regulation 19 representations, there are numerous examples of areas within the Green Belt of a similar or lower population / size to that at Hanstead Park that **are** identified as washed over Green Belt settlements using a vertical black line notation on the Policies maps. There is good logic in these areas actually being inset from the Green Belt, as we question the logic of identifying these settlements as playing an important contribution towards Green Belt openness. Further, there would be strong logic in inseting the Hanstead Park site from the Green Belt with an adjusted boundary consistent with the image underneath paragraph 6.59 of the Regulation 19 representations. Such an approach would be far more effective in clearly identifying areas within the District that do or not form a true Green Belt purpose.

- 2.24. As shown on the Policies Map, the Council proposes removal from the Green Belt of recently redeveloped land at Barnes Wallis Way, to the south-west of Bricket Wood. This does not appear to be a settlement and was not assessed as part of the Washed Over Villages Study (Arup, 2023) (GB02.04). Nor was it identified within any sub-area in the Stage 2 Green Belt Assessment report (GB02.03). Whilst its removal appears logical, it is unclear on what basis that area is proposed for removal from the Green Belt. It is unclear why it has been treated differently to our client's site, to the other side of Bricket Wood.

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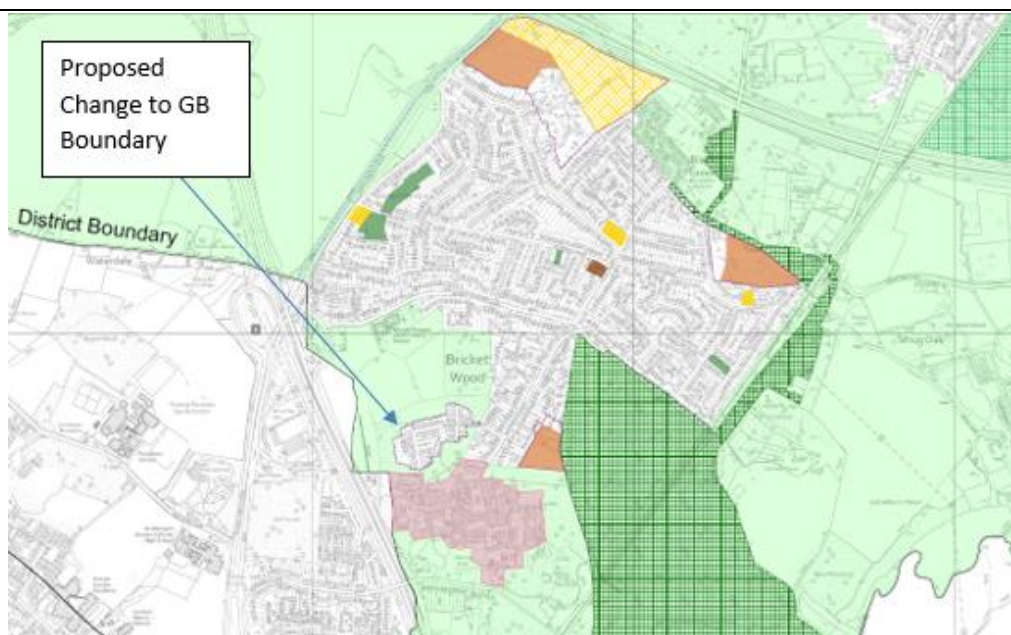


Figure 1 Extract of Policies Map 3 of 4



Figure 2 Google Street View image of residential development to be removed from Green Belt, to south-west of Bricket Wood

- 2.25. It is useful at this juncture to consider the approach to washed over villages / inseting elsewhere. The issue has recently been examined in connection with the City of York in preparing Local Plan (adopted 27 Feb 2025). In that case the Council undertook a comprehensive review of the Green Belt, both in terms of the boundaries of the same but also considering the existing developed areas and whether these should be inset having regard to the wider context. Further details relating to the example form the City of York are contained at paragraphs 2.26 & 2.27 of our stage 1, matter 3, issue 2, question 8 statement.
- 2.26. Therefore, we endorse the approach taken by the City of York to the inseting of developed areas within the Green Belt and consider a similarly

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comprehensive exercise should have been undertaken by St Albans District Council. The former HSBC Training Centre site at Smug Oak (referred to as Hanstead Park) should be inset from the Green Belt.

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