

# **St Albans New Local Plan 2041**

## **Examination in Public**

### **Matter 3 – The Green Belt**

Land North of Sandridge

On behalf of Longbourn Estates

Date: April 2025 | Pegasus Ref: LON.0649\_R002v1

---



## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	14.04.2025	PA	PA	



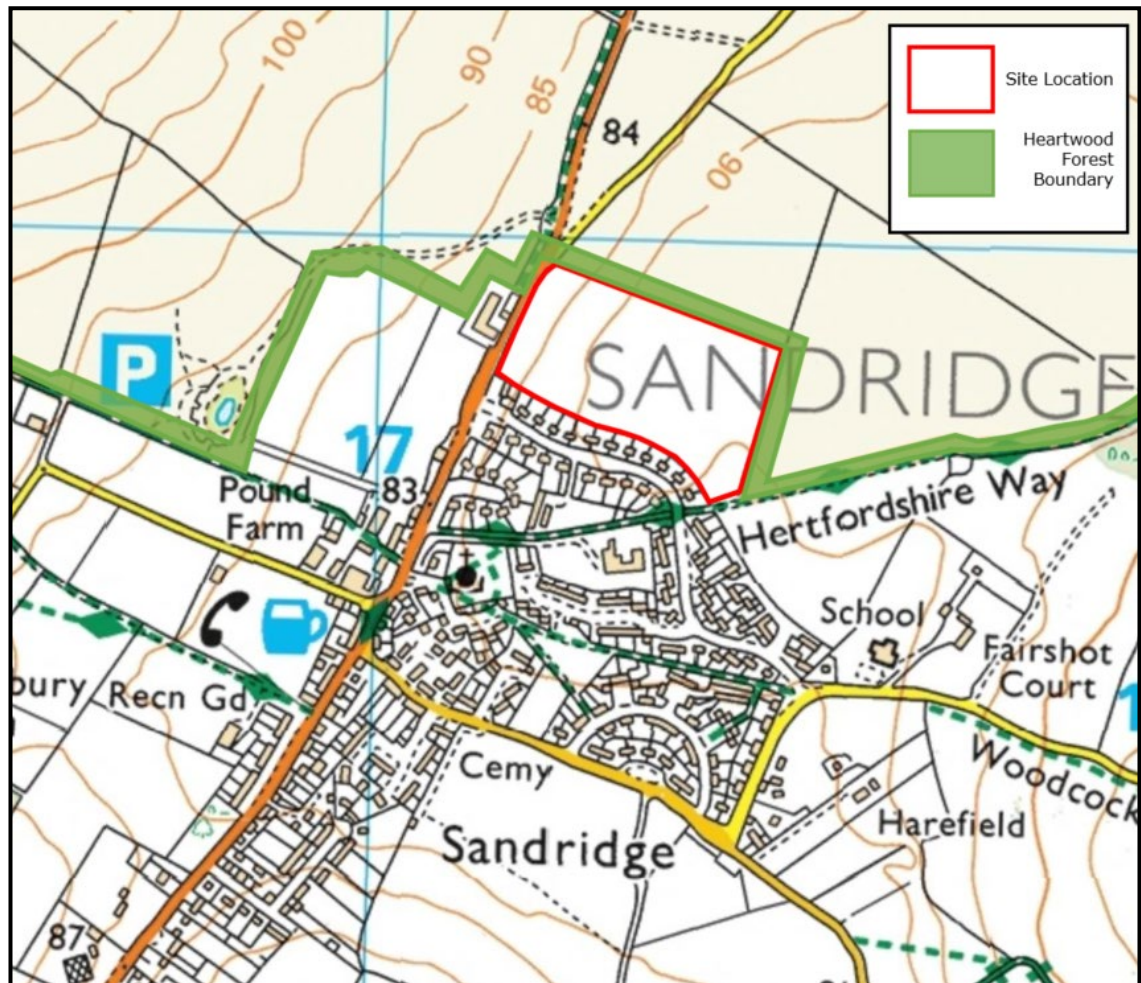
# Contents.

1. Introduction.....	1
2. Matter 3 – The Green Belt .....	2

# 1. Introduction

- 1.1. This Hearing Statement has been prepared by Pegasus Group on behalf of Longbourn Estates, the freehold owner of Land North of Sandridge, reference SAN-09-21 (HELAA, 2021), as highlighted in Figure 1 below.

**Figure 1: Land North of Sandridge (SAN-09-21)**



- 1.2. This Hearing Statement is prepared pursuant to the 'Matters, Issues and Questions for Stage 1' raised by the appointed Local Plan Inspectors, and specifically in response to **Matter 3 – The Green Belt**.
- 1.3. This Hearing Statement should be read alongside our representations to the St Albans City & District Council (SADC) Regulation 19 Draft Local Plan 2041 (September 2024).
- 1.4. Land north of Sandridge is deliverable (suitable, available and viable) within the early part of the new Local Plan period (i.e. years 2024–2029) and offers the opportunity to deliver a high-quality development of up to 150 new homes to contribute towards the District's significant housing needs for all sections of the community, including the provision of market housing, affordable housing, adaptable and older persons housing.

## 2. Matter 3 – The Green Belt

### Issue 1 – Principle of Green Belt Release

**24. Paragraph 146 of the Framework states that, before concluding that exceptional circumstances exist to justify changes to the Green Belt, the strategic policymaking authority should be able to demonstrate that it has examined fully all other reasonable options for meeting housing need. This includes making as much use as possible of suitable brownfield sites and underutilised land, optimising the density of development and liaising with neighbouring authorities to determine whether they could accommodate some of the identified need for development.**

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

- 2.1. SADC acknowledge within the Plan that due to limited urban capacity; requirements placed on development sites within the draft policies; and the unwillingness of neighbouring Local Planning Authorities within the wider Housing Market Area to assist in meeting SADCs housing needs, that there is a clear need to release Green Belt land for development.
- 2.2. SADC is therefore correct to undertake a Green Belt Review through the preparation of the new local Plan in line with paragraph 145 and 147 of the NPPF, when considering whether exceptional circumstances exist to justify changes to Green Belt boundaries.

**25. Paragraph 147 of the Framework then states that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that Green Belt alterations are necessary, "...plans should give first consideration to land which has been previously-developed and/or is well served by public transport."**

**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?**

- 2.3. The application of a 400m buffer around the higher tier settlements (St Albans & Harpenden) and 250m buffer around the lower tier settlements (Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street / Frogmore, Redbourn and Wheathampstead, only) is not considered to be justified, effective or consistent with national policy.
- 2.4. The Green Belt Review (2023) states only that *"it was agreed that the character of the urban settlements and the approach for a finer grain assessment leant itself to a 400m buffer for the main settlements whilst a 250m buffer was considered reasonable buffer for lower order settlements"*. There is no guidance with the NPPF or NPPG supporting this approach and it is unclear on what basis the above was 'agreed'.

- 2.5. The Green Belt Review (2023) states that sites that were not adjacent to existing urban areas (or buffers) were excluded for the assessment on the basis that their release 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.
- 2.6. Taking each in turn, firstly the buffers have not been applied consistently and have excluded entirely the reported lower order settlements (Green Belt villages, including Sandridge) from any further assessment, which in turn excludes potential suitable and sustainable development sites from assessment through the site selection methodology. Such an approach fails to recognise the sustainability credentials of villages such as Sandridge, which not only benefits from a range of services and facilities in and of itself, but it is also within close proximity and travel time by sustainable modes of travel to further services and facilities offered by St Albans city. Indeed, Sandridge village is closer to St Albans city centre and railway station than some areas of the city itself and benefits from sustainable transport connections to these key destinations. The buffer zones of 400m and 250m are also distances that are within acceptable walking distance of a settlement edge and fails to recognise the availability of public transport and connectivity to cycle/walking routes between development sites and adjacent settlements and beyond.
- 2.7. Secondly, the suggestion that appropriately released land on the edge of sustainable settlements such as Sandridge would undermine the integrity of the Green Belt by creating holes within its fabric is challenged and would no more undermine Green Belt integrity than the release of the identified broad locations where this is justified.
- 2.8. The Green Belt Review (2023) fails to recognise the role and function of the maturing Heartwood Forest to the north of Sandridge. The natural boundary for Sandridge, formed of the permanent boundary of the maturing Heartwood Forest is slightly further north than the existing edge of the village. The positive contribution Heartwood Forest has upon maintaining a physical and permanent boundary north of the village is overlooked. Longbourn Estates consider the forest acts as a natural edge to the village, which then allows for consideration as to the appropriate boundary of the settlement as shown in Figure 1 above.
- 2.9. Heartwood Forest represents a natural, logical and permanent boundary to the north Sandridge, with the forest serving many of the purposes of the Green Belt, by checking unrestricted sprawl, preventing coalescence, and safeguarding further countryside from encroachment. Clearly in this event, the justification for washing over Sandridge is weakened, as Green Belt protection would be unnecessary. Indeed, Land North of Sandridge is now effectively enclosed on all sides, creating a significant natural and defensible boundary between the urban and rural surroundings. As a result, the site no longer forms a contiguous element within the wider Green Belt countryside due to its effective isolation created by the maturing Heartwood Forest.
- 2.10. Sandridge village is plainly capable of accommodating a sustainable level of growth in the new plan period, but is arbitrarily deemed unsustainable through the unjustified use and misapplication of Green Belt buffer zones, which threatens the future viability and vitality of

the district's villages. The approach of the Green Belt Review and the implications for site selection assessment is therefore not considered to be an effective approach to plan-making. This can be easily resolved however, through the appropriate assessment of sites currently excluded by the buffer zones, to identify additional suitable and sustainable sites to contribute towards the significant development needs in the early part of the plan period.

2.11. Please refer to our Regulation 19 representations for further information.

**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?**

2.12. For SADC to answer.

**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?**

2.13. For SADC to answer, however it would appear that no consideration has been given to the potential for safeguarded land.

2.14. Paragraph 148c) of the NPPF is clear that when defining Green Belt boundaries, plans should, where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.

2.15. The plan makes no provision for safeguarded land within or beyond the plan period. However, given SADCs spatial strategy; the proposed stepped approach to development; and the significant increase in housing needs resulting from the NPPF (2024), it is considered that as a minimum there will be a reasonable need for an early or immediate review of the plan. In these circumstances, it is entirely reasonable to seek to identify safeguarded land within the plan to either come forward under the emerging plan when certain circumstances are triggered, e.g. when a significant housing delivery shortfall is identified against the proposed stepped approach, and/or to identify safeguarded land now which is capable of coming forward under the next Local Plan review.

2.16. As highlighted in our response to Q2 above, the presence of Heartwood Forest represents a logical, natural and permanent boundary to the north of Sandridge and development of Land North of Sandridge would therefore represent a logical expansion of the village. The site is therefore a suitable contender to be safeguarded for future development should this be deemed necessary.

## Issue 2 – Green Belt Review

26. The approach in the Plan has been informed by the Stage 2 Green Belt Review 2023 (GB 02.02). That followed an earlier Green Belt Review Sites and Boundaries Study in 2013 and 2014 (GB 04.03 and GB 04.04). In response to the Inspectors' Initial Questions, the Council provided a consolidated list of all Green Belt changes proposed in the submitted Plan.

**Q1: How does the methodology in the 2023 Stage 2 Green Belt Review differ from the earlier studies in 2013 and 2014 referenced above?**

2.17. For SADC to answer.

**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?**

2.18. For SADC to answer.

**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?**

2.19. For SADC to answer, however please refer to our response to Issue 1 Q2 above concerning the use of Green Belt buffers and the resulting arbitrary exclusion of potential suitable and sustainable sites from consideration through the Local Plan-making process.

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

2.20. For SADC to answer.

**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?**

2.21. For SADC to answer, but please refer to our response to Issue 1, Q2 regarding the use of Green Belt buffers around settlements in excluding potentially suitable and sustainable sites from further consideration through the Local Plan-making process.

**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?**

2.22. For SADC to answer.

**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?**



2.23. For SADC to answer.

**27. Paragraph 149 of the Framework states that if it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from 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?**

2.24. For SADC to answer, however the Regulation 19 draft Plan proposes to retain the current washed over status for Sandridge village, and classify Sandridge as a 'Tier 6 *Green Belt Village*'. Whilst most larger sites are reviewed in detail, sites within or adjacent to these washed over villages are not. However, paragraph 148 of the NPPF is clear that strategic policy-making 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. As such, regardless of the washed over status of the village, the implications of, and potential for delivering sustainable patterns of development should be considered in all locations.

2.25. Please refer to our Regulation 19 representations for further information.

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

2.26. Please refer to our response to Issue 1, Q2, concerning the unjustified application of Green Belt buffers in determining sites for further consideration.

## 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?**

- 2.27. To accommodate the proposed minimum 14,603 net new homes over the plan period, the Local Plan proposes amendments to existing Green Belt boundaries which are supported in principle. The NPPF makes clear that alterations to Green Belt boundaries should only be proposed in 'exceptional circumstances' which are fully evidenced and justified.
- 2.28. Longbourn Estates contend that there is a significant and robust exceptional circumstances case to be made in respect of the overwhelming need to deliver significant housing and economic growth in the district and the insufficient availability of brownfield sites to meet identified needs. If the Green Belt boundaries remained unchanged, the Council would oversee a significant shortfall in housing supply and an accelerating backlog of affordable housing. The Green Belt is a significant constraint to delivery and the lack of any changes to the Green Belt boundaries since 1994 has significantly constrained supply over an extended period. The Council's ambition to review the Green Belt as part of preparing the Local Plan to enable much needed housing delivery is therefore supported.
- 2.29. It is clear that there is also reasonable justification for considering a higher housing requirement; and that additional sites will be required to meet local housing needs in the early part of the plan period, thereby further supporting the exceptional circumstances for amendments to the Green Belt. Accordingly, suitable sites that are capable of contributing towards sustainable patterns of development but which have been arbitrarily excluded from the site selection process should now be considered for inclusion in the plan for the reasons explained above.

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

**Cambridge**

Suite 4, Pioneer House, Vision Park, Histon,  
Cambridge, CB24 9NL  
T 01223 202100  
E [Cambridge@pegasusgroup.co.uk](mailto:Cambridge@pegasusgroup.co.uk)  
Offices throughout the UK.

## Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: 33 Sheep Street, Cirencester, GL7 1RQ

We are ISO certified 9001, 14001, 45001



[Pegasus\\_Group](#)



[pegasusgroup](#)



[Pegasus\\_Group](#)

**PEGASUSGROUP.CO.UK**