Richborough April 2025

Examination of the St Albans City and District Local Plan

Matter 3 – The Green Belt



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1. Introduction

- 1.1. This examination hearing statement has been prepared by Savills on behalf of Richborough.
- 1.2. Richborough is one of the UK's leading independent land promoters. Richborough use their land, planning and commercial expertise to identify sites and secure planning permission on behalf of landowners, delivering buildable schemes in the most efficient manner.
- 1.3. Richborough has entered into a promotion agreement with landowners Pennard Bare Trust and Ulvir Limited, who control part of the proposed allocation reference: B3 West Redbourn, Redbourn, AL3 7HZ. The area of land controlled is c.12.1 hectares and has at times been referred to as Land West of Tassell Hall, Redbourn.
- 1.4. This response is also on behalf of Richard Blair in respect of his land north of Flamsteadbury Lane which also forms part of the West Redbourn allocation.
- 1.5. Richborough provided a response to the Regulation 19 consultation on the Local Plan, which is examination document reference: SADC/ED60.
- 1.6. Richborough have entered into a statement of common ground with St Albans City and District Council, which is examination document reference: SADC/ED26. Among other matters this statement of common ground states that the Council and Richborough generally support what is set out in the Local Plan Part A and what is set out in the Local Plan Part B, including the Key Development Requirements for Site B3.
- 1.7. This examination hearing statement responds only to the questions considered relevant to Richborough's land interest within the Matters, Issues and Questions for Stage 1, which is examination document reference: SADC/ED69.
- 1.8. In this response just the questions set by the Inspectors are reproduced in bold text and the response on behalf of Richborough is in unbold text.

2. 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?

- 2.1. Richborough consider there is insufficient non-Green Belt land and that all other reasonable options lead to the conclusion that a review and alteration to the Green Belt is required.
- 2.2. Outside of the main settlements the authority area is predominantly Green Belt and there is insufficient non-Green Belt land to meet the minimum local housing need for the City and District.
- 2.3. There are insufficient brownfield sites, even when densities are optimised, in order for the Council to meet its housing needs in full.
 - 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?
- 2.4. This is one for the Council to comment on. Richborough do not have a response to make on this guestion.
 - 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?
- 2.5. This is one for the Council to comment on. Richborough do not have a response to make on this question.
 - 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?
- 2.6. This is one for the Council to comment on. Richborough do not have a response to make on this question.

3. Issue 2 – Green Belt Review

3.1. Richborough have no comments to make in response to questions 1 to 9.

4. 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?

- 4.1. Richborough consider that there are exceptional circumstances that exist in the St Albans City and District to justify alterations to the Green Belt boundary.
- 4.2. Outside of the main settlements the authority area is predominantly Green Belt and there is insufficient non-Green Belt land to meet the minimum local housing need for the City and District.
- 4.3. There are insufficient brownfield sites, even when densities are optimised, in order for the Council to meet its housing needs in full.
- 4.4. It is essential to review and alter the Green Belt boundaries to begin the long overdue process of planmaking for sustainable development.

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