

# HEARING STATEMENT

## **St Albans City and District Local Plan**

### Matter 7 – Residential Site Allocations

**On behalf of**  
Beechwood Homes Contracting Ltd  
(Respondent no.332)

September 2025

## 1. INTRODUCTION

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- 1.1 This Hearing Statement has been prepared on behalf Beechwood Homes Contracting Ltd (hereafter Beechwood Homes) in response to questions set out in Matter 7 (Residential Site Allocations) of the Matters, Issues and Questions published in respect of the examination of the St Albans City and District Local Plan ('the Draft Local Plan' or 'DLP').
- 1.2 This Hearing Statement includes responses to specific questions under Issue 1 (St Albans Site Allocations) in relation to Policy M8, Verulam Golf Club.
- 1.3 Beechwood Homes have land interests at Verulam Golf Club ('the Site') which is proposed for allocation in the DLP (Allocation M8) for residential development.
- 1.4 Representations were made on the Regulation 19 Publication Draft Local Plan by Beechwood Homes and in respect of the Site (respondent no.332), through which changes to the plan were sought.
- 1.5 Matters raised within this Hearing Statement seek to avoid repeating points already made in the representations made on the Regulation 19 iteration of the DLP, unless they expressly relate to the Matters, Issues and Questions published.
- 1.6 in order to be 'sound' Plans must be positively prepared, justified, effective and consistent with national policy.
- 1.7 Under the 2024 NPPF transitional arrangement, it is recognised that the DLP will be examined in relation to national policies contained in the December 2023 NPPF. Consequently, unless expressly stated otherwise, references to the NPPF in this Hearing Statement refer to the December 2023 NPPF.

## 2. ISSUE 1 – ST ALBANS SITE ALLOCATIONS – POLICY M8 – VERULAM GOLF CLUB

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### Question 1

*What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?*

- 2.1 The Council has an acute demand for housing including a pronounced shortfall in affordable housing, there is therefore a clear need for housing and as such a clear case for Green Belt release in order to ensure development needs can be met.
- 2.2 The proposed Settlement Hierarchy focusses growth within highly sustainable locations, these are identified as primary Tier 1 settlements and are indicated at the top of the Settlement Hierarchy, where growth is prioritised. St Albans is one of these locations. The Site is located to the south of St Albans with existing residential development to the north, it is less than 1 mile from the railway station. Allocation M8 thus represents a highly sustainably located site of an appropriate scale for Green Belt release. Indeed, the Sustainability Appraisal (SA) of the St Albans Local Plan (September 2024) confirms that the site *“benefits from very good proximity to the town centre”* (paragraph 5.4.37).
- 2.3 Furthermore, the Site is well enclosed and does not make a significant contribution to Green Belt purposes. The Council's Stage 2 Green Belt Review (Arup, June 2023) confirms that over 81% of the District comprises land in the Green Belt which equates to 13,141ha. The total allocation comprises 2.8ha and thus comprises only 0.02% of the total Green Belt.
- 2.4 The alteration to the Green Belt boundary is well-founded, as it effectively closes the gap between the existing built environment to the north at 222 London Road and the Golf Club, creating a defensible and clearly defined edge that supports sustainable development while preserving the integrity of the surrounding Green Belt. These are therefore existing boundaries and thus development will be located in between existing physical features. The Site is also extremely well enclosed by existing tree planting. To the south and west of the site is the golf course itself which again forms a feature that defines the Green Belt boundary in this location. The altered Green Belt

boundary will still therefore ensure that sustainable development patterns are achieved and will not undermine the purposes of the Green Belt.

## Question 2

*Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?*

- 2.5 As set out in our Matter 3 'Green Belt' Hearing Statement the Council's Green Belt and Exceptional Circumstances - Evidence Paper (September 2024) confirms that the Council has undertaken an extensive and rigorous search for sites on previously developed land within existing built-up areas. It concludes that there is an insufficient supply of previously developed land to meet housing need.
- 2.6 The case of *Compton*<sup>1</sup> confirms that exceptional circumstances justifying alterations to the Green Belt can exist provided that the circumstances relied upon can be rationally considered to constitute exceptional circumstances. The case acknowledges that unmet housing need is potentially capable of constituting exceptional circumstances.
- 2.7 As set out within our previous Matter 3 Hearing Statement, St Albans has severe market and affordable housing shortages which cannot all be met on land which is not Green Belt. This is overall sufficient to determine that exceptional circumstances exist for altering Green Belt boundaries.
- 2.8 In terms of Allocation M8 specifically, the Site can accommodate a medium scale level of housing development and thus provide a not insignificant contribution to housing on a sustainable site which is adjacent to existing built form.
- 2.9 As above, release of this Site from the Green Belt would not cause significant harm given its existing sense of enclosure, surrounding built form and defensible boundaries created by the remaining golf course.
- 2.10 The Site is located within a sustainable settlement, well-served by existing infrastructure and public transport, thereby supporting sustainable development objectives.
- 2.11 The Site benefits from clearly definable and defensible physical boundaries, ensuring the permanence of the amended Green Belt limits. There exist therefore exceptional circumstances to justify amending the Green Belt boundary in this location.

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<sup>1</sup> *Compton PC v Guildford Borough Council & SSHCLG* [2019] EWHC 3242 (Admin)

### Question 3

*Is Policy M8 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?*

- 2.12 The Policy is justified as it is founded on a robust evidence base. Given the Council's significant need for housing sites, the Site presents a sustainable location to meet the area's housing needs and has been subject of significant assessment as part of the Local Plan process including the Sustainability Appraisal. The Policy also aligns with national policy as it supports sustainable development.
- 2.13 There are however some amendments needed to the Policy to make it effective i.e. to ensure that the Site is deliverable and can be successfully implemented (see below).
- 2.14 These amendments have been considered further to those matters raised in the Regulation 19 representation on the basis that our client is currently preparing a planning application for residential development. This scheme has been informed by technical input including in terms of ecology, trees and highways, including a pre-application with Hertfordshire County Council. Our client's decision to proceed with a planning application demonstrates that the allocation is deliverable.
- 2.15 Notwithstanding that the allocation is fully deliverable, the draft policies on housing mix (both private and affordable) within the DLP could be viewed as quite prescriptive and consideration needs to be given to such on a site by site basis. For instance, the Site does present some challenges in viability terms, including in terms of its levels, and therefore some variation to this mix may be required in order to bring the site forward. It is acknowledged that this will be considered as part of the planning balance at the planning application stage but it is necessary to acknowledge that flexibility will be required in consideration of such sites. In this respect, it is also appropriate therefore that the 65 units included within the Policy wording is confirmed as being 'indicative' to maintain the necessary flexibility to deliver the allocation.
- 2.16 As with our Regulation 19 representations, the policy objective to retain or enhance existing golf facilities, as set out at criteria 1, is supported to ensure that the Policy retains sufficient flexibility.
- 2.17 The Policy as currently drafted however makes reference to the need for contributions/improvements and enhancements to various elements including the public right of way network, access and walking and cycling provision. Any improvements or obligations will however be required to meet the CIL Regulations tests for planning obligations. In particular they must be necessary to make the scheme acceptable and reasonable and proportionate in scale. In terms of criteria 2, given the highly sustainable location of the Site, any proposals will not require significant infrastructure in order to come forward for development. This is further detailed in the supporting note from

iTransport that was submitted with the Regulation 19 representation. This Site is situated in a highly sustainable location, bolstered by its close proximity to public transport options. It is not therefore considered that all elements of the Policy as currently drafted would meet the relevant CIL tests.

- 2.18 In relation to criteria 3, whilst the potential for improvement to the adjoining right of ways is supported in principle, the requirement to upgrade to a bridleway to improve cycle access to the Site is overly prescriptive at this stage as it does not allow consideration of what a proposal can deliver. It is important that sufficient flexibility is retained for future proposals particularly as the current application demonstrates that appropriate cycle access can be provided by other means. As set out in the Regulation 19 response, criteria 3 of the policy should therefore be amended to state:

*“Proposals should include support for improvements to the local Rights of Way network where necessary in order to make the development acceptable, including providing access to the public footpath adjacent to the south-west boundary and upgrading or providing proportionate contributions to its upgrade as required.”*

- 2.19 As above, in terms of criteria 4, there are various measures that can be incorporated into future proposals to support and enhance the accessibility of the Site, these however must remain proportionate and meet the requirements of the CIL Regulations.
- 2.20 In terms of criteria 5, the proposal will not generate significant pedestrian and cycling movements between the Site and Napsbury Lane to the southeast as this is not the principal desire line for future residents. As confirmed within the supporting note from iTransport that was submitted with the Regulation 19 representation the predominant walking and cycling trip generation is the City Centre. A requirement for off site walking and cycling improvements would not therefore meet the CIL tests and this requirement of the Policy should therefore be removed.
- 2.21 Criteria 6 requires consideration of heritage assets in terms of the Sites location adjacent to the St Albans Conservation Area. Such matters have been previously considered and the Site can be developed without compromising the value of this heritage asset and there is no objection to the wording of this policy criteria.
- 2.22 In relation to criteria 7, parts of the Site are subject to a Tree Preservation Order (TPO). This TPO covers a large area which does not necessarily recognise individual trees or the lack of trees or low value of trees in much of the Site. Whilst any proposals will seek to retain important trees and landscaping to the boundaries where possible, it is necessary to indicate the housing numbers as part of the allocation as indicative in order to ensure that sufficient flexibility is retained when taking into account the TPO as part of a future proposal.

2.23 Overall, the allocation of the Site within Policy M8 is supported however it is important that criteria of the Policy are not overly prescriptive such that they would not meet the relevant tests as set out in the CIL Regulations. While the Policy is well-founded and supports sustainable development in line with national policy, several amendments are necessary to ensure its effective delivery.