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Examination of the St Albans City and District Local Plan

Save North St Albans Green Belt

Date 25th September 2025

Response to Matters, Issues and Questions for Stage 2 – PART ONE

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Introduction

Save North St Albans Green Belt (operated by CLASH) was set up following the failure of the last Local Plan and in the face of mounting pressure from developers coming forward with speculative inappropriate development on Green Belt in North St Albans. CLASH has been a resident's group since 2010.

We have attended the Stage 1 hearings. We have also, in person or virtually attended every Planning Policy and & Climate Committee meeting since November 2022 to ensure we fully understand what process St Albans District Council (The Council) has followed, to deliver a Local Plan which will impact the area forever.

We are pleased that Inspectors have progressed the examination process to Stage 2 of the review so we can have independent clarity on the site selections proposed by The Council.

Please see below our response to the Matters, Issues and Questions for Stage 2 of the Local Plan Examination hearings.

Matter 1 – Legal Compliance

Issue 2 – Strategic Flood Risk Assessment

Q1 How does the additional evidence consider surface water flood risks?

We do not believe it does consider surface water flood risk as a technical constraint appropriately. The LLFA response to document ED77 in the Additional Documents Consultation 4 July – 22 August 2025, is clear. They do not support the approach for the assessment of surface water flood risk.

Q2 Are the suggested changes necessary to make the submitted Plan sound?

Yes. Remove sites with all forms of flood risk. Site B1 North St Albans must be removed and any other sites that contain areas of surface water flood risk, which was ignored by the FRA. At minimum there should be a consideration of the red line boundary and compliance with updated NPPF and PPG guidance on sequential testing with the clear goal to provide homes safe for a lifetime.

Q3 Subject to the suggested changes, is the Plan consistent with national planning policy insofar as flood risk avoidance and mitigation is concerned?

Only if there is real focus from The Council and the LLFA to ensure that all forms of flooding are managed within NPPF and PPG guidelines and not do what has happened in Reserved Matters Application 5/2024/1284, which has bypassed SUDS standards to deliver development that is non-compliant with CIRIA SUDS design standards (and using pumping machines to pump flood water into the sewer system which is against The Council's strategic design code).

Due to established climate change measurements, rainfall data increases with each update from the Environment Agency and any approach that by-passes current rules on the basis of "judgement", leave homes unsafe into the future. Pls see attached our letter to Councillors on September 1st. The misapplication of "officer judgement" and ignorance of the LLFA, who did not object, even though we had supplied these details already in expert opinion is staggering and leads to poor development outcomes for current and future residents.

Matter 7 – Residential Site Allocations

Issue 1 – St Albans Site Allocations

Q1 Based on the discussions at the Stage 1 hearing sessions (where it was agreed that the 'Broad Locations' are specific site allocations), is Policy LG1 necessary, justified and effective?

On the face of it, these policies are very good. However, The Council has repeatedly failed to show their appetite to enforce or even condition such policies in planning applications. So on balance, we do not consider these will be effective. The policies contained in LG1(a-v), are not strong enough to provide sustainable development.

Officers with The Council already discard them even when they are part of approved outline application conditions, for example: outline application 5/2021/0423 approved with a 45 dwellings per hectare calculation, but when it came to the reserved matters application for the site, it was approved despite the density collapsing to one 26 dwellings per hectare, no blue/green zone for the flood area (instead a hard surface road and a SUDS scheme that failed CIRIA standards of design and safety). It is an extraordinary case study and completely inappropriate application of Officer Judgement. This repeats itself time again in St Albans as the misapplication of Officer Judgement continues to deliver unsustainable development. We do not know what the policy solution is here, but just know that as it stands, policy is being ignored.

Policy B1 – North St Albans

Q1 What is the site boundary based on and is it justified and effective?

The Plan does not demonstrate that the B1 boundary is tied to clear, permanent physical features or that it is the most appropriate, durable line on the ground, especially to the North and East. Surrounding parcels of land are owned by the developer or other developers and Green Belt will come under intense pressure to be developed because the B1 site is not defensible in the long term.

NPPF requires that where Green Belt boundaries are altered, they should be clearly defined using physical features that are likely to be permanent. The Plan should therefore show the boundary tied to features (road, railway, substantial hedgerow/woodland, watercourse, long-term property lines) so it is durable and not arbitrary. However, with the proposed reduction in hedgerow heights to only 1.5m and no visual barrier at the railway line (due to aggressive vegetation management by Network Rail in recent years) we do not see the site boundary to the North and East will be appropriately defended. The small group of new trees in the area will not defend from the site encroaching north-east wards, should the landowner wish to return again with development application outside of the Local Plan process.

If history repeats the approach already taken, the land owners will continue to try to deliver high rates of return on behalf of St Albans School Woollam Trust. The Trust has a clear mandate which is to exploit all avenues of profit to support St Albans School.

The site boundary is based on land ownership to maximise profit. It is not justified or effective. It does not pass the initial site selection process due to failure to pass the flood risk sequential testing. Access is poor to the East. The Woodland Trust and Herts & Middlesex Wildlife Trust do not support the approach taken to Ancient Woodland buffers. Reports supplied. The Council has not taken this into account when dealing with this site.

Q2 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?

The ARUP Greenbelt Review does not support release of B1 North St Albans. The only justifications are apparent proximity and deliverability. Proximity as the crow flies to the main railway station and city centre, does not consider the real highways constraints in the area. The topography and historic built form prohibits delivery of a safe LTN 1/20 compliant active travel route on the main A1018 or on Sandruegury Lane to beyond the railway bridge.

Deliverability, refers to the site being owned by one prominent landowner, the St Albans School and St Albans School Woollam Trust which is described as St Albans Council as a strategic partner. Strategic partner status meant that The Council refused to release emails under a Freedom of Information request on the basis of this partnership.

If this site is delivered, it will destroy the views in the area and forever damage the openness of green belt. Heartwood Forest can be seen from the public and permissive footpaths within the site. The railway line does not offer a visual boundary due to National rail removing all the trees in recent years to comply with policy: [Vegetation management - Network Rail](#)

There would then be even more intense pressure from Lightwood Strategic, as they continue to promote the site to the East of the railway line. At the recent Stage One hearings Lightwood already feel that the inclusion of B1 would a “good thing” and they see that the land to the East as “more of a good thing”. There is not a strong boundary to the north of the site, as there is a newly planted line shallow line of trees some residential properties, most of which are owned by St Albans School and leased out, so the school would be able to develop yond the red line with ease.

It cannot be demonstrated that there are strong features and which would protect against encroachment and further development further north towards Harpenden. The openness of the Green Belt here would be destroyed forever and there would very little stopping St Albans and Harpenden merging along the eastern side of the A1081 highway. A highway that is already over capacity and unable to deliver further capacity.

The Woodland Trust and Herts & Middlesex Wildlife Trust do not support the approach taken to Ancient Woodland buffers. Reports supplied. The Council has not taken this into account when dealing with this site. The ecological corridors supporting Heartwood Forest will be damaged forever, just before Heartwood becomes an SSSI.

The LLFA response to the ED77 suggests that larger sites with surface water flood risk should reconsider the red line if part of the site can be delivered. That has not happened here. Why not?

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

The only exceptional circumstance ever used to justify development on Green Belt in North St Albans is the failure of the Council to deliver the rate of development required by the Standard Method. Given there have been three different versions and interpretations of the Standard Method during the current draft Local Plan process, it would lead us to believe that dogged reliance on any Standard Method is unwarranted.

No Standard Method has ever dealt with actual need. The affordability multiple applied by the current Standard Method does not take into account that this Council has the largest social housing stock in the region, with over 4,500 social houses in the portfolio and more managed by Housing Associations. With circa 40,000 dwellings in St Albans at present, this means over 10% are social housing, restricted the supply on the open market. Whilst social housing is vital, the latest increase in earnings as part of the eligibility requirement leads us to believe that the social housing stock is now competing directly with some private sector stock. See the current income thresholds below.

To qualify for the Housing Register you must have a recognised housing need and have a local connection. You must:

- Be aged 16 years of age or over, although you cannot hold a tenancy until you are 18. Not be subject to immigration control or be an applicant from abroad unless the applicant is a 'qualifying person' as described by law.
- Be habitually resident in the common travel area (England, Scotland, Wales, Ireland, Channel Islands and the Isle of Man). See the Housing Allocations Policy for more details
- Have a local connection to the St Albans area. Full details of Local connection are given at 7.5 of the Housing Allocations Policy.
- Have an identified housing need (unless aged 60 and over and applying for sheltered or properties restricted for those aged 60 and over).
- Have no history of unacceptable behaviour.
- Not have the financial resources to resolve your own housing need. The following gross household incomes would be regarded as sufficient to resolve housing needs:

Bedroom entitlement	Income Limit
1 bedroom	£38,000
2 bedrooms	£50,000
3 bedrooms	£60,000
4+ bedrooms	£79,500

Annual Gross Household Income Limits will be reviewed on an annual basis, taking into account Local Housing Allowance Rates for the St Albans District.

The amounts permitted reflect annual gross household income, including adult children aged 18 and over that are included as part of the application to the St Albans Housing Register. See Section 12 of the Allocations Policy for further details about Financial Assessment.

It transpired at the Stage One hearings that the Council was part of the East of England Plan, where the target for housing delivery was significantly lower than those implied by the Standard Method. These lower targets have never been considered by Officers when dealing with applications from 2020 onwards and they have always justified development due to "housing delivery failure" as the exceptional circumstance. In 2021, Inspector Masters in the Bullen Green Lane appeal, laid the standard by which every speculative development since has been assessed which has meant Green Belt boundary change by the backdoor, outside of the Local Plan process.

Exceptional Circumstance do not exist to justify Policy B1, which damaging and unsustainable development.

With over 80% of St Albans District classified as Green Belt, of course alternatives can be found to ensure the most unsustainable developments are not permitted because the Council has failed to properly run the site selection methodology. We fully endorse Councillor Cannings response to the Additional Documents Consultation 4 July – 22 August 2025.

The Council must publish and rely upon a clear, auditable site-selection/alternatives appraisal, showing why B1 is essential to the deliver of the Plan as whole. We strongly feel they cannot and B1 should be removed. Any allocation must be accompanied by a binding infrastructure delivery strategy and legally enforceable obligations showing how the benefits outweigh Green Belt harm. Without those things, exceptional circumstances have not been demonstrated in a way that can be relied upon.

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner?

It is unclear to us, even though the developer has undertaken a range of consultations. There seems to be a continual, "wait and see" approach which lacks transparency.

The allocation sets an indicative use (housing-led) and references strategic policies, but it lacks firm, enforceable requirements for mix, phasing, and coordinated delivery. That leaves the development of B1 dependent on piecemeal consents and developer-by-developer solutions rather than a coherent urban extension.

There are no explicit phasing or trigger points tying housing delivery to necessary off-site or on-site infrastructure

Q5 How have flood risk and ecology been taken in account as part of the site's allocation?

Within The Plan, there is no published site-specific Flood Risk Assessment or sequential/exceptions testing in the allocation material to show the developable area would avoid high-risk surface water flood zones or that SuDS drainage can be accommodated at scale within the site, because the Council failed to acknowledge this in the site selection process or afterwards in document ED77. The included the site, despite the clear risks, waiving them away with an approach not supported by the LLFA in their response to document ED77 in the Additional Documents Consultation 4 July – 22 August 2025

Ecology: there is little BNG delivery strategy or indication of where off-site compensation would be provided. Protected species/habitat survey data are not included in the allocation evidence. Any BNG deliver strategy offsite would substantially impair the Heartwood Forest ecological corridor. Our Heartwood Halo study has been updated and can be found here: [General 6 — Save North St Albans Greenbelt](#)

Flood risk:

The response by the LLFA to the document ED77 in the Additional Documents Consultation 4 July – 22 August 2025, is clear. The LLFA do not support the approach for the assessment of surface water flood risk. The LLFA have also responded directly to the B1 site application, saying the following (full document attached):

*We **object** to this planning application (5/2024/2271) in the absence of an acceptable Flood Risk Assessment and Drainage Strategy relating to:*

- *The development is at risk of surface water flooding.*
- *The proposed SuDS are likely to increase the risk of flooding elsewhere.*
- *The development is not in accordance with NPPF, PPG or St Albans local policies including FR1, FR3, CS26 and LP29.*

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

Ecology:

The Woodland Trust and Herts & Middlesex Wildlife Trust do not support development plans at this site due to the egregious impact on two sites of ancient woodland and protected hedgerow. Both stating the buffer around Ancient Woodland has been inappropriately applied and should be much larger. Thereby changing the red line and changing the quantity and density of housing.

We were also easily able to conduct a bat survey with the help of a local group Wilderhood Watch. They have shared the results of the survey with the Council and it clearly shows that both Cala Homes and St Albans School have failed to fully disclose the extent of the protected bats in the area. These will most certainly be resident within Heartwood and it's Ecological corridor (attached).

Q6 Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

Hertfordshire County Council's high-level transport requirements (ped/cycle links, junction considerations) but does not present a clear, site-specific access strategy, detailed modelling results, or an Infrastructure Delivery Plan identifying how and when junction upgrades can be delivered. As drafted, the Plan does not make it sufficiently clear how and when the highway improvements will be designed, funded and delivered.

No published detailed highway modelling / junction capacity testing for the key nodes referenced (Ancient Briton, King William IV, Harpenden Road) are within the documents, even after the Additional Documents Consultation 4 July – 22 August 2025. We responded to the consultation separately.

There is no deliverable safe active travel route. The active travel routes conditioned in 5/2021/0423 and 5/2024/1284 for the connected site, cannot be delivered within the legal requirement for LTN 1/20. We have already supplied our Highways expert statements on this matter.

The site contains the rural highway, Sandridgebury Lane, leading to the hamlet of Sandridgebury and connecting to the conservation area of Sandridge Village. There is no pavement, it is single track in most places, with passing places and is regularly flooded. To date, there suggestion to close this rural lane because it cannot adapt to the huge increase in volume. However, the suggestion is a wait and see approach and extensive removal of protected hedgerow to allow of access across the site. The 1,000 dwelling site would still promote an exit via the railway bridge, which is single track, due to the need for SUDS. The highways modelling is completely unrealistic. Valley Road is also to be closed, shutting one of two access routes to the industrial estate of Porters Wood. There has been impact assessment of the closure of either road.

Q7 Is Policy B1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

As currently drafted, Policy B1 is not justified, not effective, and not consistent with national policy. The Council has not produced the necessary site-specific evidence (boundary permanence tied to physical features, site-level exceptional-circumstances justification, FRA, ecology/BNG delivery, detailed transport/access modelling and an explicit delivery/phasing/infrastructure schedule) to make the allocation sound.

There has been no re-assessment of the red line.

The only acceptable modification is the removal of this site.

The Plan is not sound with inclusion of B1 North St Albans.