

Examination of the St Albans City and District Local Plan Matters, Issues and Questions for Stage 2

Statement on behalf of the owners of land at Wood End, Redbourn
Lane, Hatching Green

Matter 7 – Issue 1 – St Albans Site Allocations
Policy M22 – Land at Wood End, Hatching Green

DLA Ref: 23/317

October 2025

Introduction

1. This statement is submitted on behalf of the owners of land at Wood End, Redbourn Lane, Hatching Green ('the Site'). Representations have been made to Regulation 18 and Regulation 19 draft Local Plan Consultations promoting the allocation of the Site for residential purposes.
2. This statement provides a response to the Inspectors' questions Q1, Q2, and Q3 raised in respect of Policy M22 (Land at Wood End, Hatching Lane) under Matter 7 (residential site allocations) and Issue 2 (Harpenden site allocations).
3. The owners of the land at Wood End, Redbourn Lane, Hatching Green support the proposed allocation of the site for residential purposes.

Question 1 – What is the site boundary based on and is it justified and effective? What is the existing use of the site?

4. The Inspectors ask at **Question 1**: *“What is the site boundary based on and is it justified and effective? What is the existing use of the site?”*
5. The boundary for Site M22 is drawn around land owned by John and Wendie Brew.
6. The site is currently in use as residential and paddock land.
7. The Site exhibits a semi-rural yet contained character that is evident both from aerial mapping and at ground level. It is visually enclosed by strong landscape boundaries and has an established relationship with existing built development to the south-east. This visual and physical containment, coupled with its proximity to the existing settlement, means the site forms a natural extension to the built-up area rather than an incursion into open countryside.
8. As recognised in the Council’s Stage 2 Green Belt Review undertaken by Arup, the site forms part of a sub-area that makes a less important contribution to the wider Green Belt. As discussed further in the response to Q2 below, the site’s release, either in isolation or alongside adjoining parcels was considered unlikely to significantly harm the wider Green Belt. The Review therefore supports the conclusion that boundary is appropriately drawn around a well-contained parcel that does 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?

9. The Inspectors ask at **Question 2**: “Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?”
10. From a general perspective, The Council’s Green Belt and Exceptional Circumstances Evidence Paper (GB.01.01), states that having undertaken an extensive and rigorous search for Previously Developed Land within existing built-up areas, there is an insufficient supply of such land to meet the housing need, which led to the Council undertaking a search process for sites in the Green Belt. In this context, the Paper thus concluded as follows:

“The Council has concluded that ‘Exceptional Circumstances’ do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and primarily employment land. Further there are existing areas of significant built development created since the last Local Plan was adopted in 1994, identified in the Green Belt Review stage 2, where the Council has concluded that the necessary ‘Exceptional Circumstances’ exist to amend the green belt boundaries.”
11. With reference also to Section 3 (Strategic Context) of our previous representations made in relation to the St Albans Draft Local Plan 2041 Regulation 19 Consultation, with regard to the historic delivery of housing in the District, it is thus accepted the required Exceptional Circumstances’ necessary to amend Green Belt boundaries exist.
12. The Council’s Stage 2 Green Belt Review, undertaken by Arup, assessed the site as part of the wider Hatching Green Location, SA-14. The review concluded that this sub-area makes a less important contribution to the wider Green Belt and was therefore recommended for further consideration either in isolation as RA-9, or in combination with a partial release of SA-15b to the north. The Council have since taken forward the southern section of the SA-14 sub-area as a draft housing allocation.
13. The site’s inclusion as a proposed housing allocation follows its assessment through the Council’s evidence base, including the Site Selection Proforma, Transport Impact Assessment (TIA) and High-Level Heritage Impact Assessment (HIA), all of which confirmed the site’s suitability for residential development. These studies identified no technical, environmental or legal constraints to delivery and concluded that safe and appropriate access can be achieved from Redbourn Lane, supported by the inclusion of suitable visibility splays and a proposed pedestrian crossing.

8. The site adjoins existing development to the south-east and is enclosed by mature woodland to the west, with residential properties to the north and south. The adjoining washed-over development to the north-west further reduces the sub-area's role as a barrier to sprawl, while its existing physical features define a clear and lasting boundary. The site occupies a less essential part of the gap between Harpenden and Redbourn, where there is no perceptual relationship between the two settlements, meaning development here would not significantly erode the openness or separation of the Green Belt. These characteristics indicate that the site's development would not undermine the strength or permanence of the Green Belt in this location, consistent with paragraph 149 of the NPPF.
11. It is also noted that the Site accords with the wider Site Selection Methodology applied to Sites recommended for further consideration by the Green Belt Stage 2, as outlined in Section 6 of the Council's Green Belt and Exceptional Circumstances Evidence Paper (GB.01.01), on the basis that:
- it could accommodate 5 or more homes once site restrictions were taken into place
 - a suitable access could be provided
 - there is no requirement to retain the existing use; and
 - the site does not have characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District.
12. In all the above circumstances, it is considered that exceptional circumstances exist to justify amending the Green Belt boundary in this location to include this contained, well related and accessible site.

Question 3 – soundness of Policy M22

13. The Inspectors ask at **Question 3**: *“Is Policy M22 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?”*
14. The owners of land at Wood End, Hatching Green support the allocation of site M22 in the draft Local Plan. With reference to Section 5 of our previous representations made in relation to the St Albans Draft Local Plan 2041 Regulation 19 Consultation, the requirements of the policy are considered to be justified, effective and consistent with national planning policy.
15. A formal pre-application enquiry (PRE/2025/0097) was submitted to the Council in respect of the proposed development of 14 dwellings with associated access, parking and landscaping, including a new pedestrian crossing on Redbourn Lane. The pre-application process provided the opportunity to discuss key technical and design considerations with officers in advance of this Local Plan Examination. The submitted site layout is appended at 1.
16. The Council’s Report confirmed that the site is identified as allocated site M22 within the emerging Local Plan and therefore demonstrates the Council’s current position that the land is suitable for release from the Green Belt and for residential development. The advice acknowledged that, although the draft Plan is not yet adopted, the allocation reflects a positive approach to meeting the District’s significant housing need. The Council in their report identify that the site can likely be considered as “grey belt”, meaning it no longer performs a strong Green Belt function, and that its release would not fundamentally undermine the purposes of the wider Green Belt.
17. The Council acknowledged that the site’s edge of Conservation Area location and proximity to the locally listed building, Wood End, can be satisfactorily addressed through sensitive design and the introduction of an appropriate landscape buffer. The overall layout and density is acceptable in principle, subject to improvements to strengthen cohesion across the housing typologies and ensure that the development reads as a single, well-integrated scheme.
18. Technically and environmentally, no constraints were identified that would prevent the development of the site. The pre-app advice confirmed that with appropriate mitigation and submission of supporting documents, an application could proceed positively once the Local Plan is adopted.

19. The pre-application engagement provides clear evidence that the capacity of the site to deliver 14 dwellings is realistic, achievable, and supported in principle by the Council. The Council's advice reinforces the site's inclusion as a sound and deliverable allocation.

Appendix 1 – Pre-application enquiry proposed site layout:



LAND ADJACENT TO WOOD END, HARPENDEN.

DLA | Heritage

DLA | Strategic

DLA | Commercial

DLA | Residential

DLA | Leisure

DLA | *Solutions*