

Matter 11 – The Natural Environment

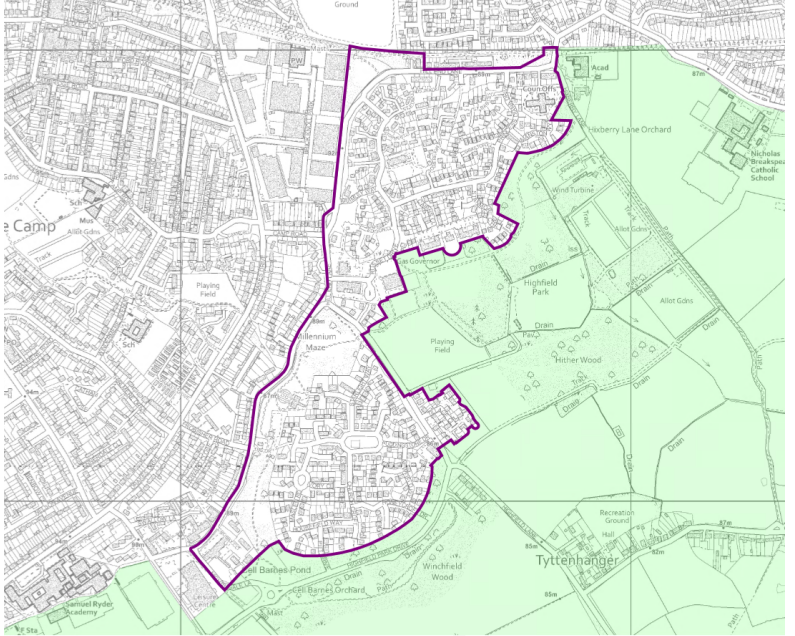
Issue 1 – The Green Belt – Policies LG5 – LG9

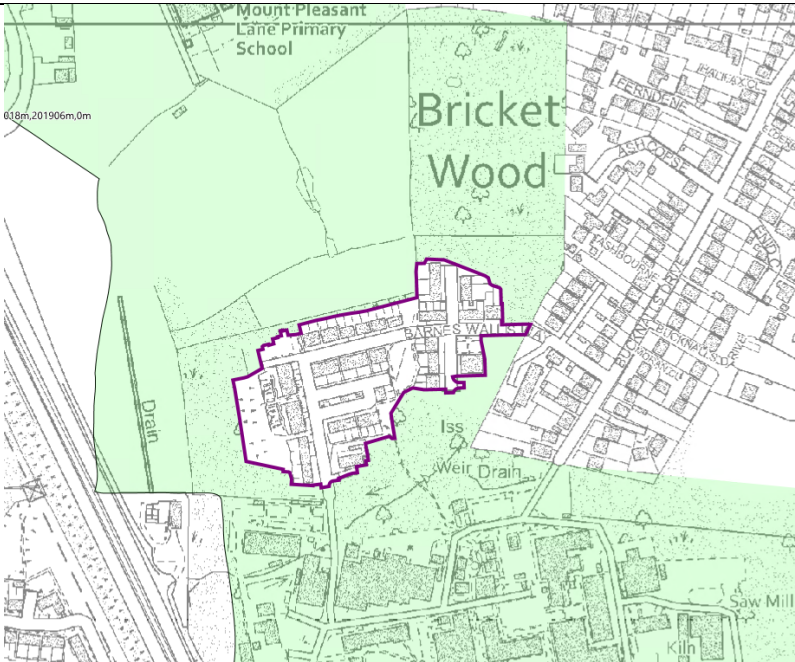
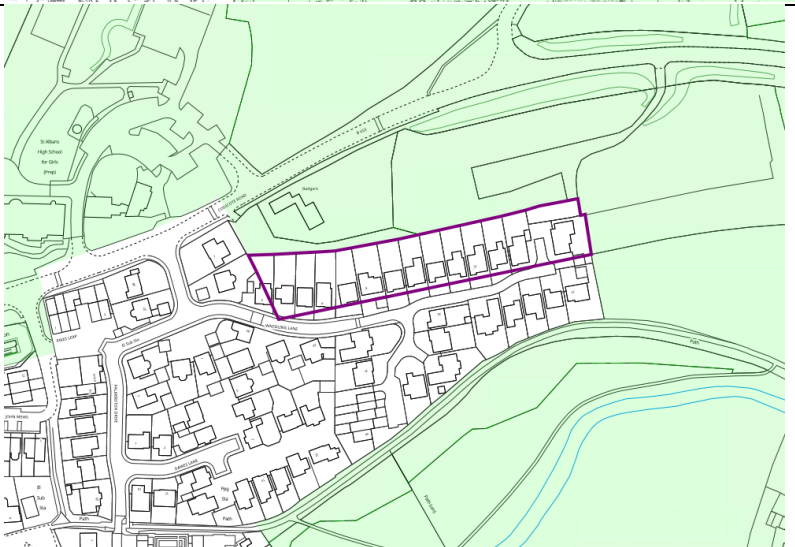
Q1 Are any alterations proposed to the Green Belt boundary which do not form part of the site allocations under Matter 7? If so, what are the exceptional circumstances which justify the alterations proposed?

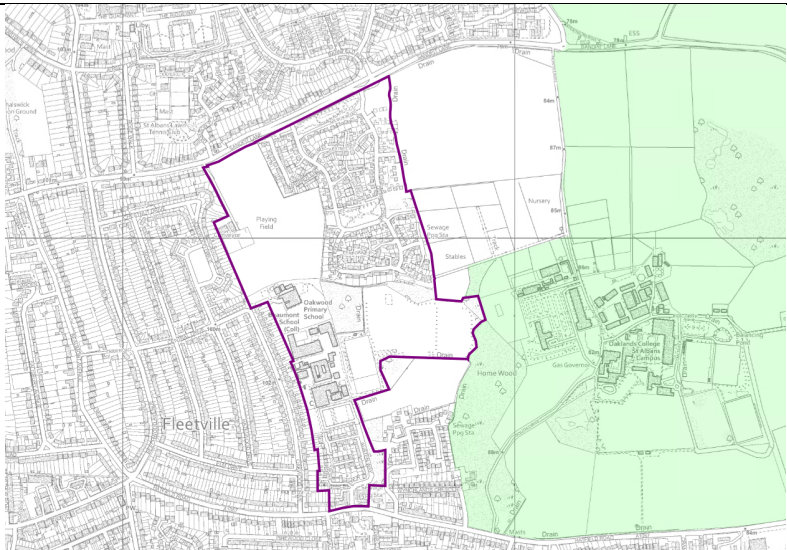
Are any alterations proposed to the Green Belt boundary which do not form part of the site allocations under Matter 7?

- 1.1 Yes, there are several alterations proposed to the Green Belt boundary which do not form part of the site allocations under Matter 7.
- 1.2 The tables below set out a composite list of alterations to the Green Belt Boundary for areas and sites which do not form part of the site allocations under Matter 7.
 - Sites and areas are rounded to the nearest 2 decimal points.
 - For ease of reference, a number has been appended to each of the alterations proposed to each area/site
 - Maps contain public sector information licenced under the Open Government Licence V3.0. © Crown copyright and database rights 2025 Ordnance Survey AC0000819589.
- 1.3 There are five areas that require alterations to the Green Belt boundaries to reflect changes on the ground post the District Local Plan Review 1994 which are set out in Table 1.

Table 1 – Alterations to the Green Belt boundaries post the District Local Plan Review 1994

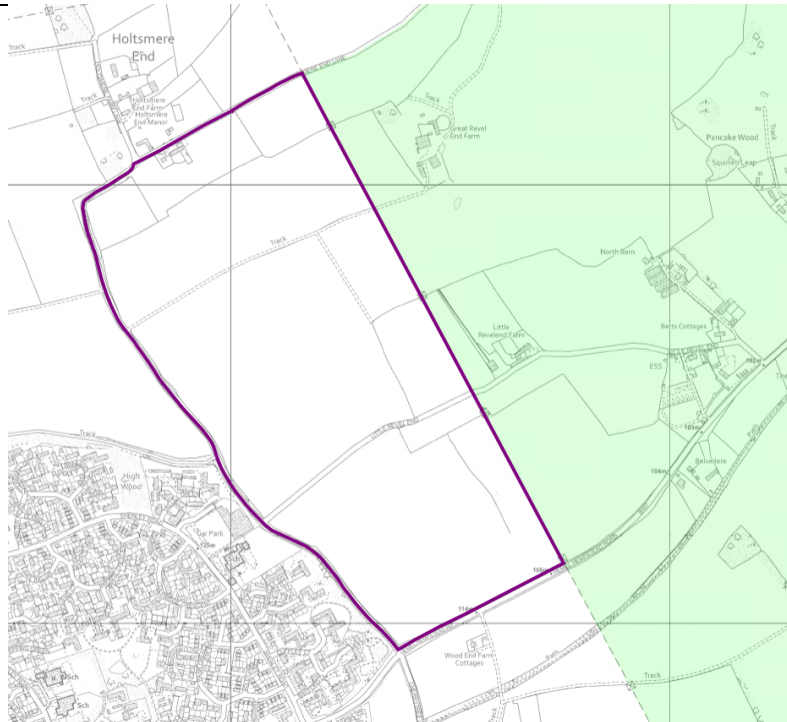
Alteration Number	Location	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
1	Highfield and Cell Barnes, St Albans	51.75	 A detailed map of the Highfield and Cell Barnes area in St Albans. The map shows a large area of land, primarily green, which is the Green Belt. A purple boundary outlines the proposed change to the Green Belt. The area includes several parks and open spaces, such as Highfield Park, Playing Field, and Hether Wood. The map also shows surrounding residential areas and roads.
2	Orchard Drive, How Wood	2.39	 A detailed map of the Orchard Drive, How Wood area. The map shows a large area of land, primarily green, which is the Green Belt. A purple boundary outlines the proposed change to the Green Belt. The area includes several parks and open spaces, such as Meadows and How Wood. The map also shows surrounding residential areas and roads.

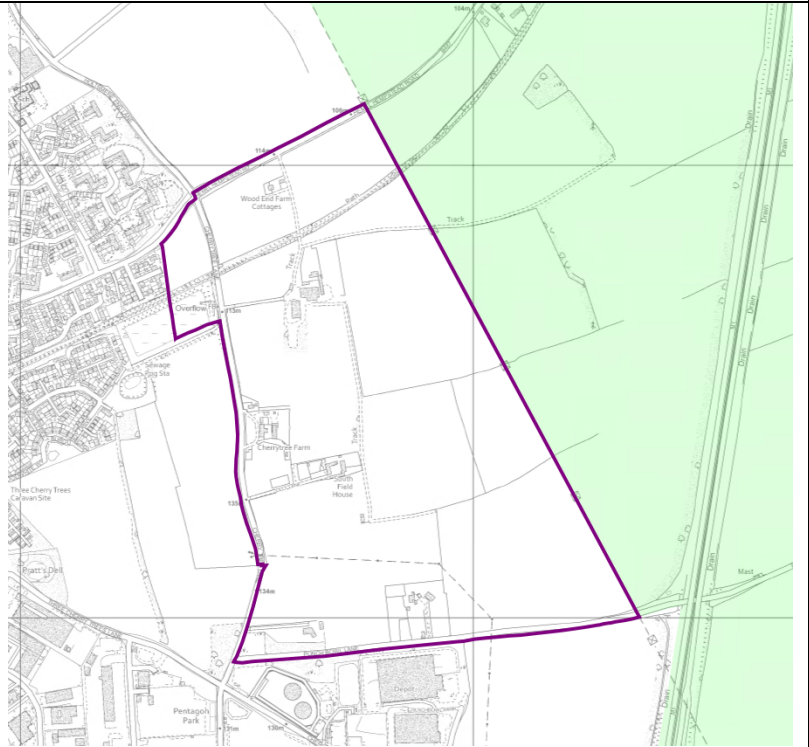
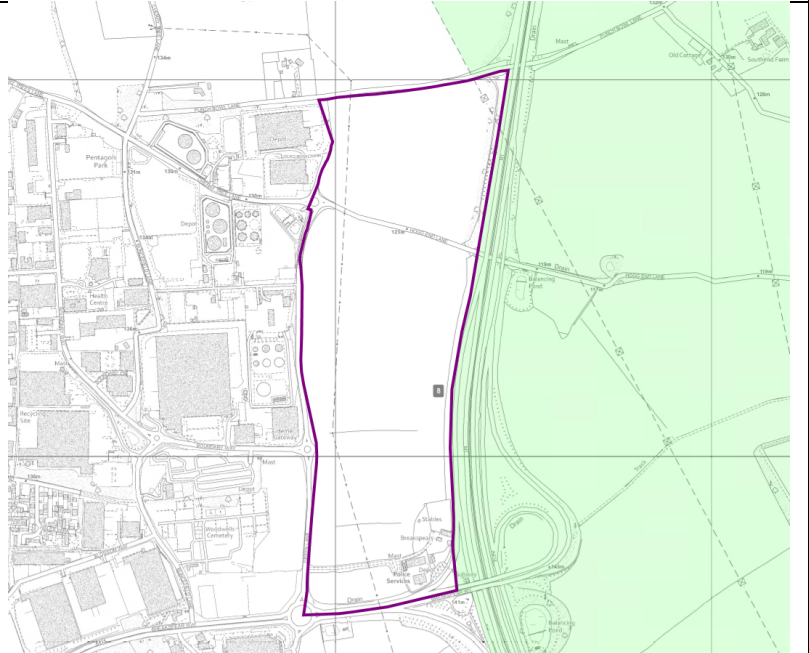
Alteration Number	Location	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
3	Barnes Wallis Way, Bricket Wood	2.76	
4	Waddington Lane, Wheathampstead	0.47	

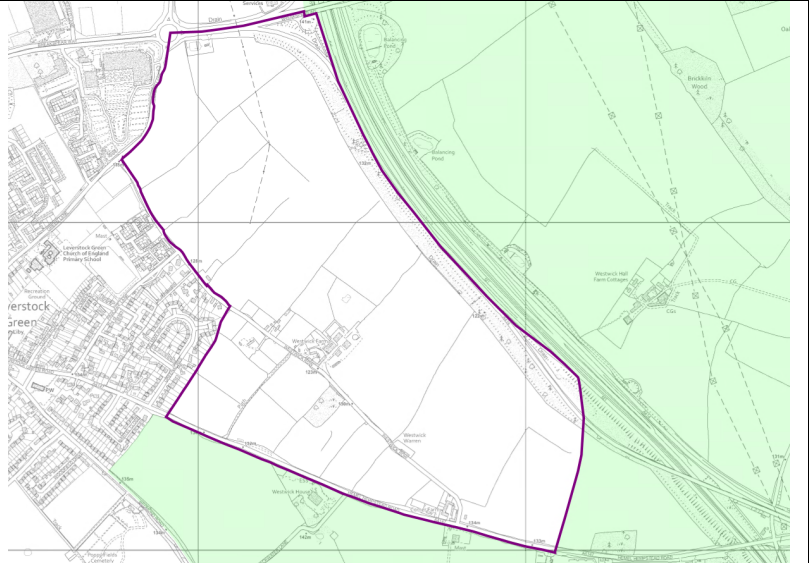
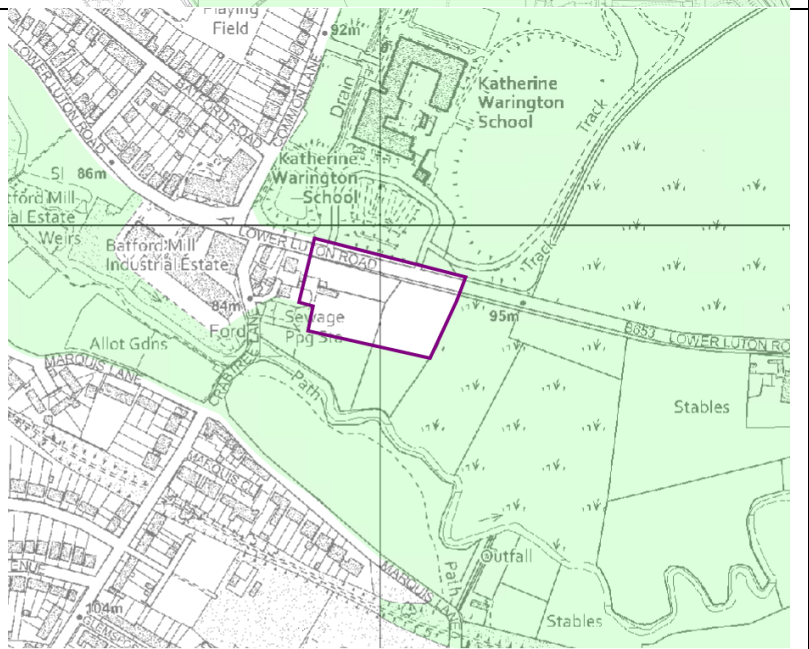
Alteration Number	Location	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
5	Oakwood Primary School, Beaumont School and developed area at East St Albans	36.46	

1.4 There are eight sites and areas which do not form part of the site allocations under Matter 7, which require Green Belt alterations. This is set out in Table 2 below.

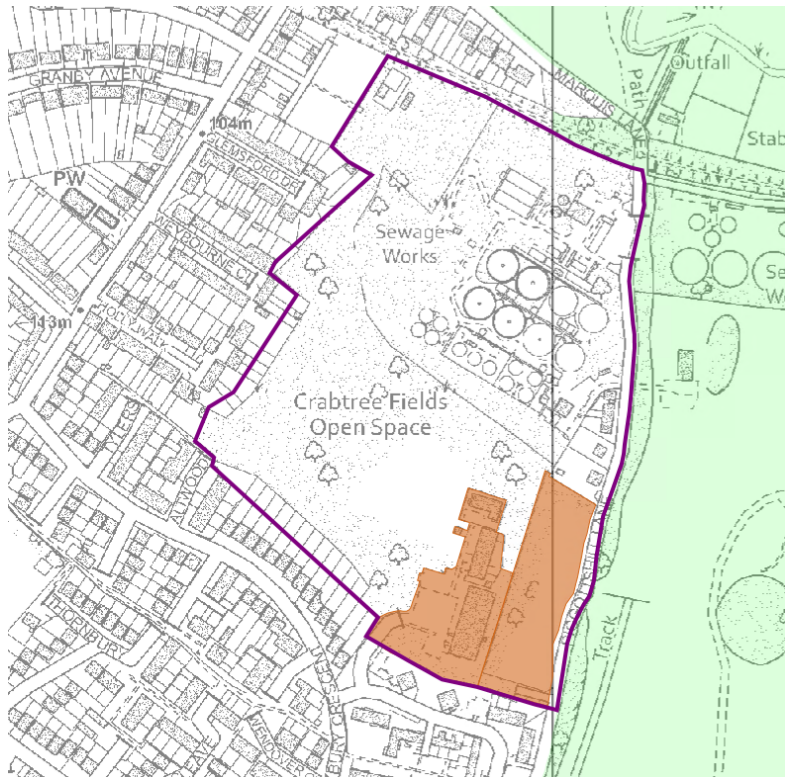
Table 2 - Alterations to the Green Belt boundaries, sites which do not form part of the site allocations under Matter 7

Alteration Number	Site Allocation Reference / Name	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
6	H1 - North Hemel Hempstead, AL3 7AU	71.04	

Alteration Number	Site Allocation Reference / Name	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
7	H2 - East Hemel Hempstead (North), HP2 7HT	73.26	
8	H3 - East Hemel Hempstead (Central), HP2 7LF	57.56	

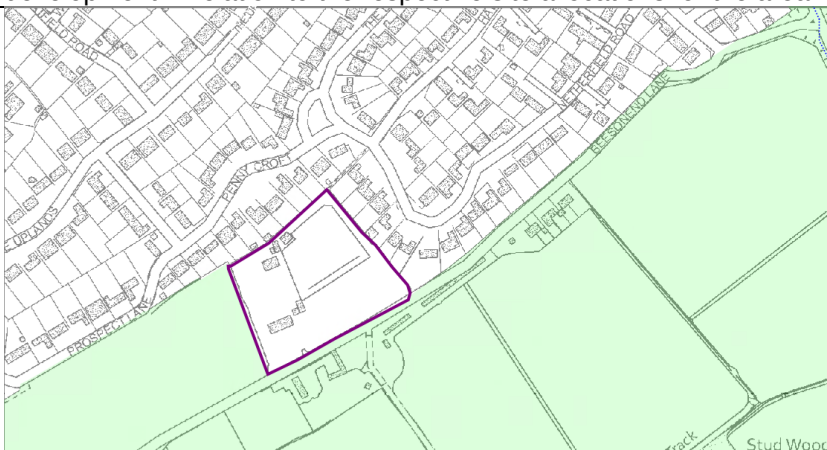
Alteration Number	Site Allocation Reference / Name	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
9	H4 - East Hemel Hempstead (South), HP2 4PA	126.12	
10	M20 - Lower Luton Road, AL5 5AF	1.13	

Alteration Number	Site Allocation Reference / Name	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration.
11	OS3 - Rothamsted Research, Harpenden Campus, AL5 2JQ	1.92	Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
12	OS4 - Rothamsted Research, Harpenden Campus, AL5 2JQ	1.81	

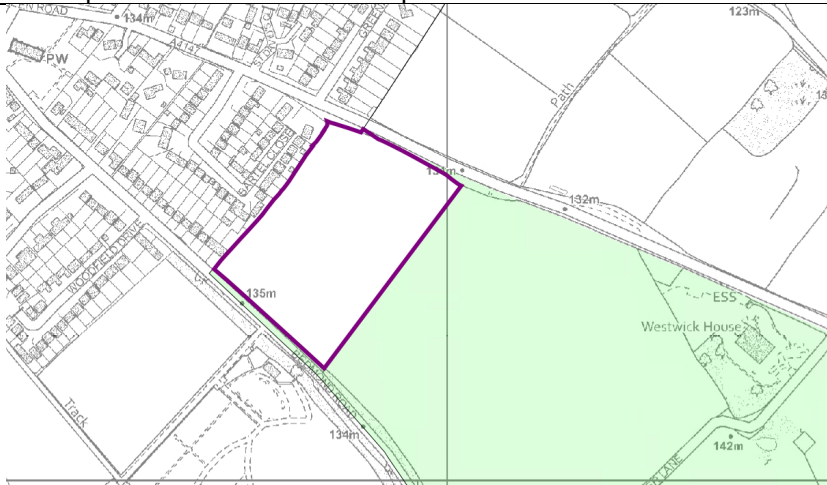
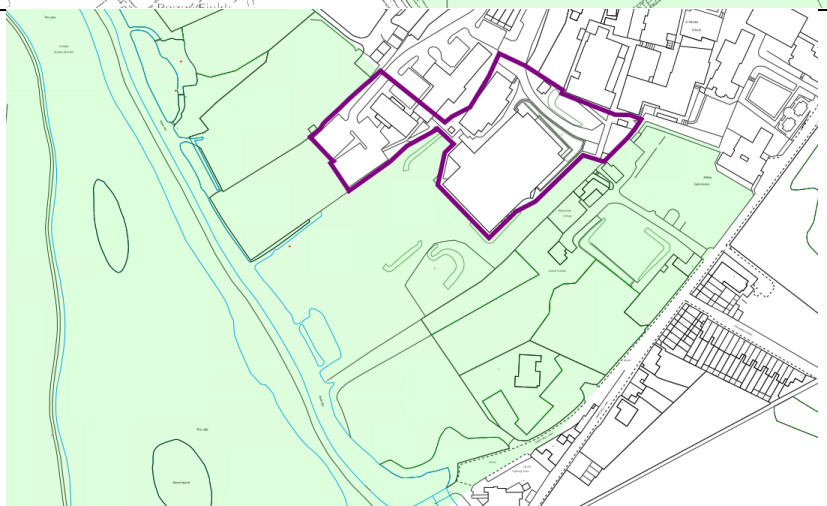
Alteration Number	Site Allocation Reference / Name	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
13	Sewage Treatment Works, Piggottshill Lane, Harpenden, AL5 5UN (Formerly allocated as M5 in Regulation 18) Crabtree Fields, Waldegrave Park, Harpenden	9.9 (excludes site allocations shaded brown)	

1.5 There are six Main Modifications which propose further areas of alterations to the Green Belt boundaries set out in SADC/ED85B and SADC/ED85C and replicated at Table 3 below.

Table 3 - Alterations to the Green Belt boundaries, proposed as Main Modifications for sites/areas which do not form part of the site allocations under Matter 7

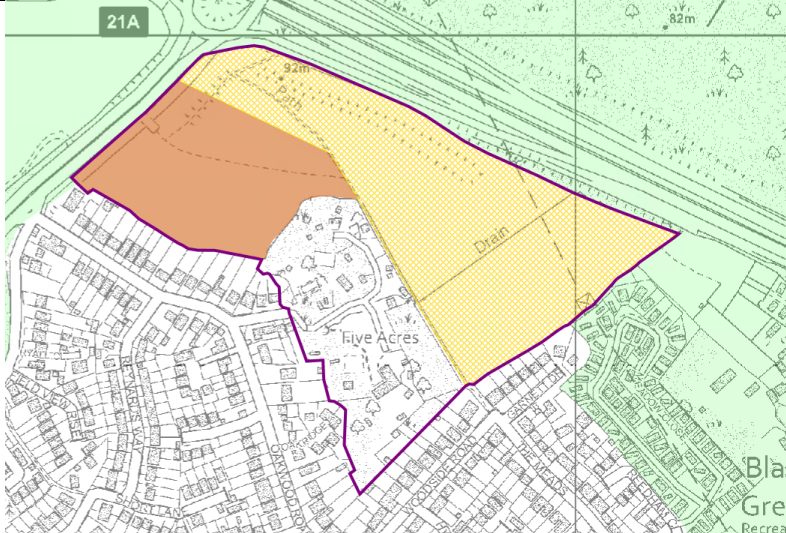
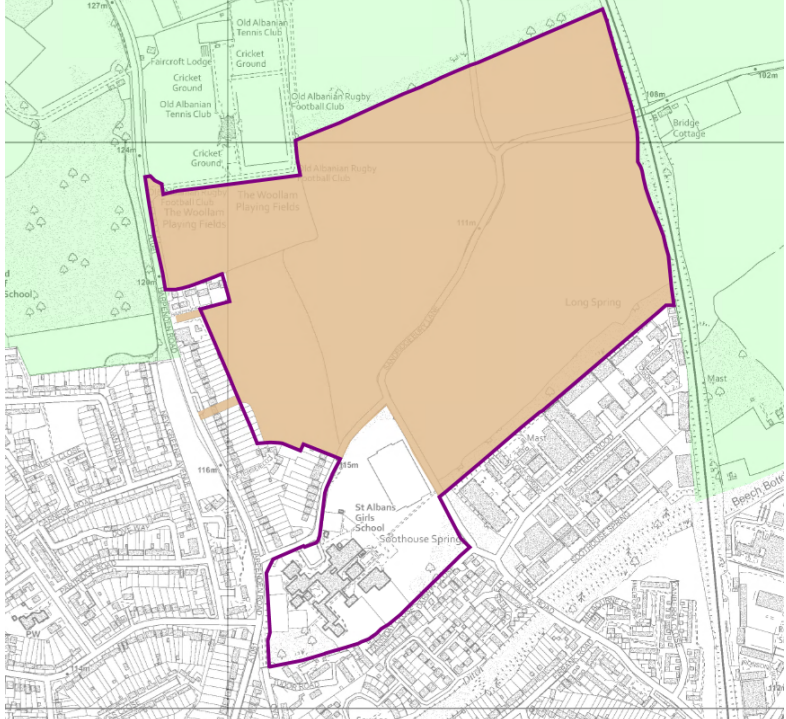
Alteration Number	Ref/Location	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District. The shaded Brown shows proposed areas for development in relation to the respective site allocations for the area.
14	M14 - Land at Beesonend Lane, Harpenden, AL5 2AB	2.03	

Alteration Number	Ref/Location	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District. The shaded Brown shows proposed areas for development in relation to the respective site allocations for the area.
15	M24 - South of Codicote Road, AL4 8GD	2.03 (N.B overlaps with existing alteration – Waddington Lane, see Table 1 of 0.74 ha)	
16	M26 - Highway Chipping Depot, Lower Luton Road	0.34	
17	H2 - East Hemel Hempstead (North), HP2 7HT (proposed school building)	3.6	

Alteration Number	Ref/Location	Reduction in Green Belt (approx. in hectares)	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District. The shaded Brown shows proposed areas for development in relation to the respective site allocations for the area.
18	Policy COM1 – reserved school allocation at Hemel Hempstead	4.08	
19	Aquis Court 31 Fishpool Street, St Albans	0.74	

- 1.6 There are five areas of alterations to the Green Belt boundaries, which do not form part of the sites in Matter 7, however adjoin them. Alterations to the Green Belt boundaries for these areas are considered necessary to enable openness and permanence of the proposed new Green Belt boundaries and to avoid creation of isolated pockets of Green Belt. A comprehensive list of Green Belt alterations was presented in response to the Initial Questions IQ2, SADC/ED33. Table 4 below seeks to further clarify these changes.

Table 4 - Alterations to the Green Belt boundaries which adjoin sites in Matter 7

Alteration Number	Location	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District. The shaded Brown and hatched yellows areas shows proposed areas for development in relation to the respective site allocations for the area.
20	Five Acres, Bricket Wood, St Albans	
21	St Albans Girls School (STAGS), Sandridgebury Lane, St Albans	

22	Hatching Green, Harpenden	
23	Aldwick Manor/Aldwick Lodge/Hunters Lodge, Wheathampstead Road, Harpenden	
24	93-101 Colney Heath Lane, St Albans Alban Way, St Albans	

If so, what are the exceptional circumstances which justify the alterations proposed?

- 1.7 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundaries for areas and sites which do not form part of the site allocations under Matter 7.
- 1.8 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024).
- 1.9 GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024). Paragraph 7.2 states:

The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- The acuteness/intensity of the housing need.*
- The inherent constraints on supply/availability of non-Green Belt land.*
- The difficulties of delivering sustainable development without impinging on the Green Belt.*
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.*
- The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

- 1.10 The evidence paper goes on to say in paragraph 7.3 that:

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

- 1.11 There is also the need to deliver the housing requirements set out in the Plan, which is seeking to meet the 'Standard Method' for housing in full. There is also the need to deliver a range of other associated infrastructure and community facilities.
- 1.12 Paragraph 145 of the NPPF sets out:

Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries,

having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through nonstrategic policies, including neighbourhood plans.

- 1.13 For the alterations to the Green Belt boundaries post the District Local Plan Review 1994 and as set out in response to Stage 1 M3I2Q9 this sets out on page 21:

these are areas where there has been significant built form completed since the Green Belt boundary was last altered through the adoption of the District Local Plan Review 1994. These areas of proposed release are suburban in character and physically adjoin areas currently excluded from the Green Belt, such that they now form part of the urban areas of (1) St Albans (3) Bricket Wood and (4) Wheathampstead respectively.

- 1.14 Exceptional circumstances for each area are set out below.

1 - Highfield and Cell Barnes, St Albans

- 1.15 As set out in response to Stage 1 M3I2Q9, this sets out on page 22:

Alteration includes developments that took place post adoption of the District Local Plan Review 1994, which now form part of the built-up urban area.

- 1.16 The GB 03.01 - Green Belt Review Purposes Assessment Report (partly superseded) (2013) on page 66 sets out:

8.4 Boundary Adjustments

8.4.1 Land recommended for boundary adjustments as a result of development within the Green Belt is listed below and mapped in Figure 8.1.

...

- *SA-BA1 – Development at Highfield Park along southeast edge of St Albans (GB33)*

...

Boundary changes are recommended in light of the purposes assessment and field visits, which have identified Green Belt land which has been subject to substantial development. As a result this land no longer contributes towards the four national Green Belt purposes and the local Hertfordshire purpose. Development has caused the Green Belt boundary to be compromised and therefore it is suggested that it is redrawn along the new built edges. This adjustment of the Green Belt boundary will result in a cleaner and clearer edge and a reaffirmation of the importance of landscape openness and policy permanence beyond that edge.

- 1.17 GB 03.02 - Green Belt Review Purposes Assessment Report Annex 1.2 St Albans (partly superseded) (2013) on page 66 sets out:

GB33 – Next Steps

Development at Highfield Park along southeast edge of St Albans is recommended for further assessment as a potential boundary adjustment (SA-BA1). Green Belt land has been subject to substantial development and as a result this land no longer contributes towards the 5 Green Belt purposes.

2 - Orchard Drive, How Wood

- 1.18 As set out in response to Stage 1 M3I2Q9, this sets out on page 21:

... has planning permission for residential development of 30 homes and development has commenced. There is also a Parish Council owned children's play facility. This area has had significant built form started and/or completed since the Green Belt boundary was last altered through the adoption of the District Local Plan Review 1994. This area of proposed release is suburban in character and physically adjoins an area currently excluded from the Green Belt, such that it now forms part of the urban area of How Wood.

3 - Barnes Wallis Way, Bricket Wood

- 1.19 As set out in response to Stage 1 M3I2Q9, this sets out on page 24:

Alteration includes developments that took place post adoption of the District Local Plan Review 1994, which now form part of the built-up urban area.

4 - Waddington Lane, Wheathampstead

- 1.20 As set out in response to Stage 1 M3I2Q9, this sets out on page 25:

Alteration includes developments that took place post adoption of the District Local Plan Review 1994, which now form part of the built-up urban area.

5 - Oakwood Primary School, Beaumont School and developed area at East St Albans

- 1.21 As part of response to Stage 1 M3I2Q9, it has become apparent that there is a minor error in part of the omitted reference for this alteration, therefore the alteration is described here. This minor clarity error does not change the overall approach to the alterations set out by the Council.
- 1.22 The alteration includes developments that took place post adoption of the District Local Plan Review 1994, which now form part of the built-up urban area. The Green Belt Review recommended that the area be released. It would also be wholly enclosed by the adjoining area to the east proposed for Green Belt release as site B4 East St Albans. The GB 02.03 Green Belt Review Annex Proforma Report (2023) assesses SA-77a (page 359 - 361) and SA77b (page 363 - 365), which concludes:

SA-77a

Purpose Assessment

Summary

The sub-area performs weakly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs weakly against purpose 1 criteria (b). It performs weakly against purposes 2 and 3; and does not meet purpose 4.

Wider Green Belt Impacts

Summary

Overall, the sub-area does not play an important role with respect to the strategic land parcel and if released in isolation or in combination with the western section of SA-77b, is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in isolation as RA-36, or in combination with the western section of SA-77b as RC-8.

SA-77b

Purpose Assessment

Summary

The sub-area performs weakly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs weakly against purpose 1 criteria (b), 2 and 3. It does not meet purpose 4.

Wider Green Belt Impacts

Summary

Overall, the western section of the sub-area does not play an important role with respect to the strategic land parcel and if released in combination with SA-77a, is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. The western section of the sub-area is recommended for further consideration in combination with SA-77a as RC8.

- 1.23 For the alterations to the Green Belt boundaries for sites which do not form part of the site allocations under Matter 7 referred to in Table 2, the exceptional circumstances are set out below.

6 - H1 - North Hemel Hempstead, AL3 7AU

- 1.24 The exceptional circumstances are set out in response to M6I7Q3.

7 - H2 - East Hemel Hempstead (North), HP2 7HT

- 1.25 The exceptional circumstances are set out in response to M6I8Q3.

8 - H3 - East Hemel Hempstead (Central), HP2 7LF

- 1.26 The exceptional circumstances are set out in response to M6I9Q5.

9 - H4 - East Hemel Hempstead (South), HP2 4PA

- 1.27 The exceptional circumstances are set out in response to M6I10Q3.

10 - M20 - Lower Luton Road, AL5 5AF

- 1.28 The specific localised Green Belt impacts are considered in the findings of GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). GB 02.03 on pages 157 to 160, relating to sub-area 32, states:

Purpose Assessment

Summary

The sub-area meets the purposes strongly overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purpose 4, performs weakly against purpose 2 and performs moderately against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released in isolation or in combination with SA-31 is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in isolation as RA-20 or in combination with SA-31 as RC-4.

- 1.29 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out on pages 22 to 24 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

The site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site is recommended to progress.

11 - OS3 - Rothamsted Research, Harpenden Campus, AL5 2JQ

- 1.30 The specific localised Green Belt impacts are considered from the findings of GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). GB 02.03 on pages 87 to 90, relating to sub-area 15b, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area performs weakly against purpose 2 and performs moderately against purposes 3 and 4.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however if the north-east and south-east of the sub-area was released in isolation or in combination with SA-14, it is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a partly less important contribution to the wider Green Belt. If the north-eastern part of the sub-area only is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. If the southern part of the sub-area only is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in isolation as RA-11 and RA-12; recommended for further consideration in combination with SA-14 as RC-2.

- 1.31 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out on pages 7 to 9 and 10 to 12 in LPSS 02.08 - Green Belt Sites Recommended Other Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

Part of the site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site is recommended to progress.

12 - OS4 - Rothamsted Research, Harpenden Campus, AL5 2JQ

- 1.32 The specific localised Green Belt impacts are considered in the findings of GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). GB 02.03 on pages 83 to 86, relating to sub-area 15a, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purpose 4, performs weakly against purpose 2 and performs moderately against purposes 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however its release in isolation is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in isolation as RA-10.

- 1.33 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out on pages 10 to 12 in LPSS LPSS 02.08 - Green Belt Sites Recommended Other Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

Part of the site is recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site is recommended to progress.

13 - Sewage Treatment Works, Piggottshill Lane, Harpenden, AL5 5UN (Formerly allocated as M5 in Regulation 18) / Crabtree Fields, Waldegrave Park, Harpenden

- 1.34 The specific localised Green Belt impacts are considered from the findings of GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). GB 02.03 on pages 161 to 164, relating to sub-area 33, states:

Purpose Assessment

Summary

The sub-area meets the purposes weakly overall. The sub-area meets purpose 1 criteria (a) and performs weakly against purpose 1 criteria (b). The sub-area does not meet purpose 4 and performs weakly against purposes 2 and 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area does not play an important role with respect to the strategic land parcel and if released in isolation or in combination with SA-34, is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs weakly against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-21 or in combination with SA-34 as RC-5.

- 1.35 For alterations to the Green Belt boundaries there are proposed Main Modifications for sites/areas which do not form part of the site allocations under Matter 7. This is set out in Table 3 and the exceptional circumstances for each site/area are set out below.

14 - M14 - Land at Beesonend Lane, Harpenden, AL5 2AB

- 1.36 The exceptional circumstances are set out in response to M2I2Q2.

15 - M24 - South of Codicote Road, AL4 8GD

- 1.37 The exceptional circumstances are set out in response to M2I2Q2.

16 - M26 - Highway Chipping Depot, Lower Luton Road

- 1.38 The exceptional circumstances are set out in response to M2I2Q2.

17 - H2 - East Hemel Hempstead (North), HP2 7HT (proposed school building)

- 1.39 The exceptional circumstances are set out in response to M6I8Q3.

18 - Policy COM1 – reserve school allocation at Hemel Hempstead

- 1.40 The specific localised Green Belt impacts are set out in the GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). GB 02.03 on pages 716 to 718, relating to sub-area 162, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purpose 4, performs weakly against purpose 2 and performs strongly against purpose 3.

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, and its release in isolation or in combination would harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.

- 1.41 HCC set out in their Reg 19 representation (ref 328-5) that they wanted the site released from the Green Belt. The representation states:

To be considered sound the plan should:

...

- 1. Safeguard the build zone for the secondary school at Land East of Hemel Hempstead (South) and land between the green belt and the urban area pending a local plan review.*

... the plan should remove from the green belt and safeguard the 4.36 build zone for a 10FE secondary school adjacent to Land East of Hemel Hempstead (South). This school is also required to deliver the wider Land East of Hemel Hempstead allocations and potential cumulative growth in Dacorum and therefore the same need for the school to be deliverable applies. However, as the Land East of Hemel Hempstead (South) allocation is expected to be delivered later in the plan period and the need for the school is also dependant on growth in Hemel Hempstead itself under the control of Dacorum, the school is unlikely to be needed within the current plan period. The school is also a separate allocation and will be acquired through a purchase than a s106 legal agreement. Therefore release from the green belt via safeguarding and a plan review is the most appropriate mechanism to secure this school through the planning process.

...

This approach best balances the need for the plan to meet its education need under NPPF paragraph 99, ensure that green belts are only revised in exceptional circumstances under paragraph NPPF paragraph 144, and ensure green belt boundaries are likely to be permanent under paragraph 148 (e).

- 1.42 Hertfordshire County Council has recently provided a build zone for a secondary school, based on their own technical work. Therefore, there is a proposed Main Modification is set out in SADC/ED85B and SADC/ED85C that would take the proposed school build zone out of the Green Belt.

19 - Aquis Court 31 Fishpool Street, St Albans

- 1.43 St Albans school sets out in their Reg 19 representation (ref 358-4) that they wanted the site released from the GB. Page 2 sets out the following:

St Albans School's main campus is within the St Albans Conservation Area, partially within the Green Belt and many of its buildings are heritage assets (including, as mentioned, the Abbey Gateway, as well as other listed structures). As a consequence, the School is aware of the sensitive nature of the site and the surroundings and always takes great care in the design and siting of any development proposals. The School is committed to remaining in a location with which it has had such a long association. However, in order to continue to succeed and meet the challenges of the next decades the School must provide the quality of facilities demanded by a competitive market and optimise the use of its current site by refurbishing and/or replacing outdated facilities. This is particularly challenging in a complex urban location, with both heritage elements and Green Belt notation. It is therefore essential that a vehicle such as the 'Development Plan' does all it can to help facilitate the delivery of these improvements and development control policies must not compromise necessary development.

- 1.44 SADC have considered the above and are proposing a Main Modification that excludes large institutional school developments that have taken place post adoption of the District Local Plan Review 1994, which now form part of the built-up urban area.
- 1.45 Overall, it is considered that exceptional circumstances are considered to exist to justify amending the Green Belt boundaries in these locations.

Q2 What is the rationale for Policy LG5 criterion a) and b), given that the overarching approach is to consider development proposals in the Green Belt against national planning policy?

- 2.1 The policy is considered to provide clarity that there is SADC support for certain types of development in the Green Belt.

- 2.2 Part a) of the policy seeks to use development to proactively manage the Green Belt and is aligned with paragraph 150 of the NPPF that sets out:

150. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

- 2.3 Part b) of the policy sets out certain types of development proposal that SADC considers to be 'very special circumstances' to guide decision-making in line with paragraphs 152 and 153 of the NPPF:

152. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

- 2.4 Overall, the rationale is to provide a clear steer that in this District, which is over 81% Green Belt and where all land outside of the main urban areas is washed over by the Metropolitan Green Belt, where proposals are consistent with Green Belt purposes and objectives the Council will support in principle certain opportunities that arise through development to proactively manage Green Belt land and certain types of infrastructure provision.

Q3 Is Policy LG6 (and the Plan when read as a whole) consistent with paragraph 47 of the Framework, which states that plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements?

- 3.1 Yes, Policy LG6 (and the Plan when read as a whole) is considered to be consistent with paragraph 147 of the 2023 NPPF.
- 3.2 Paragraph 147 of the 2023 NPPF says:

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. 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. Where it has been concluded that it is necessary to

release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out 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.

- 3.3 Specific compensatory measures, consistent with paragraph 147 of the 2023 NPPF are listed for many proposed allocations in Part B of the draft Local Plan. Full details of those compensatory measures are set out in Table 1 below (including the proposed Main Modifications shown in track changes below and as set out in SADC/ED85b and SADC/ED85c).

Table 5: Specific compensatory improvements required for proposed site allocations

Site allocation	Specific compensatory improvements required as set out in the Key Development Requirements for the site allocation ¹
H1 - North Hemel Hempstead, AL3 7AU	3. Contributions<u>Delivery of / contributions</u> to improve and enhance countryside access links and off-road paths (Public Rights of Way) including Footpath 9, 10 and 11. 5. A substantial new Significant Publicly Accessible Green Area providing facilities for new and existing communities and a permanent green buffer to Redbourn. 7. Contributions Delivery of / contributions to access and route improvements to the Nickey Line including connections to Redbourn and placemaking enhancements set out in the Nickey Line Vision and Strategy.
H2 - East Hemel Hempstead (North), HP2 7HT	3. Improved and enhanced countryside access links including connections under the M1 motorway and improved off-road paths (Public Rights of Way) including Footpath 13 and Footpath 44. Access and route improvements to support active travel along Punchbowl Lane. 5. A substantial new Country Park providing facilities for new and existing communities and a permanent green buffer to Redbourn. 6. Access and improvements to the Nickey Line including connections under the M1 motorway and wider placemaking enhancements set out in the Nickey Line Vision and Strategy. Public transport priority measures and active travel routes through the development and via the Nickey Line to the County park and SANG should be provided.

¹ Some of the Key Development Requirements have suggested main modifications which are marked in orange.

Site allocation	Specific compensatory improvements required as set out in the Key Development Requirements for the site allocation ¹
H3 – East Hemel Hempstead (Central), HP2 7LF	3. Contributions to / delivery of access and improvement to the Nickey Line including wider placemaking enhancements set out in the Nickey Line Vision and Strategy. 5. Improved and enhanced countryside access links and off-road paths (Public Rights of Way) in and adjacent to the site and out into the wider recreational network to the east including to the existing Hogg End Lane, St Michael Footpath 3, Three Cherry Trees Lane and Punchbowl Lane.
H4 - East Hemel Hempstead (South), HP2 4PA	7. A Significant Publicly Accessible Green Area providing facilities for new and existing communities and a permanent green buffer to the south-east.
B1 - North St Albans, AL3 6DD	9. Support <u>Improvements via delivery or contributions</u> for the improvement of the Public Rights of Way network to enable active travel and recreational use to Heartwood Forest and Nomansland Common.
B2 - North East Harpenden, AL5 5EG	8. Support <u>Improvements via delivery or contributions to the Upper Lea Valley Way into Harpenden and out to Luton</u> and for links to / from and improvement of the Upper Lea Valley Way into Harpenden and out to Luton. 9. Support for improvements <u>Improvements via delivery or contributions</u> to the Public Rights of Way that link into the wider network to enable recreational use.
B3 - West Redbourn, Redbourn, AL3 7HZ	3. Provision of links and support for improvements <u>via delivery or contributions</u> to the Nickey Line as an active travel corridor. Right of Way improvement contribution to the link under the M1 and out into the wider recreational network to the West. The network of Public Rights of Way must be retained and enhanced to encourage local walkers and dog walkers to use local routes into the wider countryside.
B4 - East St Albans, AL4 9JJ	8. Particular focus on the existing Rights of Way within and surrounding the site will be required, also including a link to Jersey Lane. 9. Support <u>Improvements via delivery or contributions</u> for footpath 004 Colney Heath (East Drive) to be upgraded to bridleway status and improved to enable active travel to Hatfield, the University of Hertfordshire and Ellenbrook Fields. 10. Support <u>Improvements via delivery or contributions</u> for a link for active travel from upgraded Footpath 004 to the Hatfield Road (Boggymead Springs). 11. Support <u>Improvements via delivery or contributions</u> for provision of an E/W route for pedestrians, cyclists and horse riders between BR 051 Sandridge and Central Drive, St Albans.

Site allocation	Specific compensatory improvements required as set out in the Key Development Requirements for the site allocation ¹
	12. Contributions towards the Ellenbrook Fields country park.
B5 - Glinwell, Hatfield Road, St Albans, AL4 0HE	3. Consideration of horse-riders in any access / connectivity work and <u>support for provision-improvements via delivery or contributions</u> of a link between Oakland College's land north of Hatfield Road and the bridleway network to the south and east of the site. 6. Contributions towards the Ellenbrook Fields country park.
L1 - Burston Nurseries, North Orbital Road, St Albans, AL2 2DS	3. Contribution to the improvement of Public Rights of Way in the vicinity to enable active travel between the site and Bricket Wood. <u>Support for Improvements via delivery or contributions of</u> upgrade of St Stephens Footpath 014 to bridleway status and improve for active travel.
M3 - Bedmond Lane, St Albans, AL3 4AH	1. Proposals must take account of the Public Rights of Way on site and include support for improvements to the local walking and cycling route network. Enhanced walking and cycling connections between Bedmond Lane and Mayne Avenue should be achieved. 3. <u>Support for improvements-Improvements via delivery or contributions</u> to the PRow network to enable active travel into St Albans.
M4 - North of Oakwood Road, Bricket Wood, AL2 3PT	5. <u>Support for Improvements via delivery or contributions to</u> existing St Stephens Footpath 029 to be upgraded and improved to enable active travel to the north from Bricket Wood across the M25 and north into the wider network to St Albans.
M6 – South of Harpenden Lane, Redbourn, AL3 7RQ	4. Active mode access to the Nickey Line, and support for its enhancement, will be required. 5. <u>Support for Improvements via delivery or contributions to</u> enhanced connectivity of the Nickey Line into Redbourn and onwards to Harpenden would be welcomed, including improvements to access / crossings and to surfacing / lighting where appropriate. This should be considered in line with GTP / LCWIP schemes and the Nickey Line Greenspace Action Plan.
M7 - Townsend Lane, Harpenden, AL5 2RH	2. <u>Delivery of / Contributions</u> /enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. Including improved surfacing on the Nickey Line, improved access to the Nickey Line at the Roundwood Park entrance, traffic calming measures and footway improvements along Townsend Lane and Moreton Avenue.

Site allocation	Specific compensatory improvements required as set out in the Key Development Requirements for the site allocation ¹
M8 - Verulam Golf Club, St Albans, AL1 1JG	3. Proposals must include support for improvements via delivery or contributions to the local Rights of Way network, including providing access to the public footpath adjacent to the south-west boundary and upgrading it to bridleway status to improve cycle access to the site. 5. Support for Improvements via delivery or contributions of additional walking / cycling provision to the South-East of the site, towards Napsbury Lane, should be considered and explored as a significant opportunity to improve wider connectivity and enhance the Rights of Way network. This is currently a significant gap in the walking network and could not be included in the LCWIP despite local stakeholder comments and evidence of demand due to the lack of adequate footway along this route and lack of continuous right of way between London Colney and the Sopwell area.
M9 – Amwell Top Field, Wheathampstead, AL4 8DZ	3. Support for Improvements via delivery or contributions to Wheathampstead Footpath 027 to be upgraded to bridleway status and its width increased, or for provision of an equivalent alternative route, to enable active travel between Wheathampstead, Nomansland Common and Sandridge beyond.
M13 – North of Boissy Close, Colney Heath, AL4 0UE	1. Proposals must include support for improvements via delivery or contributions to the local Rights of Way network, including access to the Alban Way adjacent to the northern boundary.
<u>M14 - Beesonend Lane, Harpenden, AL5 2AB</u>	<u>4. Rights of Way around/to the site (footpath 5) should be retained and enhanced</u>
M15 - Bucknalls Drive, Bricket Wood, AL2 3YT	3. Support for provision Improvements via delivery or contributions of an active travel route linking to St Stephen Footpath 059 and Bricket Wood Common for recreational access.
M16 - Falconers Field, Harpenden, AL5 3ES	1. Proposals must include support for improvements to the local Rights of Way network, including access to the footpath adjacent to the western boundary and the Nickey Line.
<u>M24 - South of Codicote Road, Wheathampstead, AL4 8GD</u>	<u>4. Improvements via delivery or contributions to the Ayot Green Way is required as part of compensatory improvements to access to the Green Belt.</u>

- 3.4 Clause a) of Policy LG6 sets out the requirement for all sites, including those listed in Table 1 above, to submit, as part of any planning application, a Green Belt compensation strategy that sets out compensatory measures that align with national planning guidance. This ensures that the draft Local Plan is consistent with national planning policy for all proposed allocations in the Green Belt, including those where

there are no specific compensatory measures that can be included in the Key Development Requirements for the site. Compensatory measures set out in the required compensation strategy can be secured by a planning obligation.

Q4 What is expected from development proposals on the smaller site allocations released from the Green Belt in Part B of the Plan? How will development proposals be expected to meet the requirements in Policy LG6?

What is expected from development proposals on the smaller site allocations released from the Green Belt in Part B of the Plan?

- 4.1 Policy LG6 sets out what is expected from development proposals on the smaller site allocations released from the Green Belt in Part B of the draft Local Plan.
- 4.2 Specifically, clause a) of Policy LG6 sets out that:
- a) [The allocations in Part B that are facilitated by Green Belt boundaries changed by this Plan are required, to a degree proportionate to the development, to] Submit a Green Belt compensation strategy that sets out compensatory measures that align with national planning guidance, relating to:*
- i. New or enhanced green infrastructure;*
 - ii. Woodland planting;*
 - iii. Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
 - iv. Improvements to biodiversity, habitat connectivity and natural capital;*
 - v. New or enhanced walking cycling or equestrian routes; or*
 - vi. Improved access to new, enhanced or existing recreational and playing field provision.*
- 4.3 The policy enables a flexible approach to be taken, as each site is different, and the compensatory measures suited and / or available to each site will differ, as will the scale of compensatory measures, related to the size of the site.
- 4.4 However, the policy does require the compensatory measures to be one or more of the types listed in sub-clauses i. to vi., providing certainty of the requirements to applicants.
- 4.5 Clauses b) to f) of Policy LG6 set out requirements for site allocations released from Green Belt to prevent harm to, and improve links to the existing green and blue infrastructure on the site and adjacent to the site.

How will development proposals be expected to meet the requirements in Policy LG6?

- 4.6 Clause a) of Policy LG6 sets out the requirement for all sites, including those listed in Table 1 above, to submit, as part of any planning application, a Green Belt compensation strategy that sets out compensatory measures that align with national planning guidance. Development proposals will be expected to meet the requirements in Policy LG6 either through a planning obligation, or through a planning condition. Determining whether a planning obligation or a planning condition will be used will be on a case-by-case basis taking into account how the compensatory improvements are to be provided (for example, compensatory improvements that are provided on-site or on land in the same ownership as the site allocation could be secured through a planning condition, whereas off-site provision on sites in different ownership would be secured via planning obligation).

Q5 What is the justification for referring to limited infilling in Policy LG7, which is concerned with rural exception sites?

- 5.1 Policy LG7 in the draft Local Plan does not refer to 'limited infilling' itself, although there is a reference in paragraph 3.59 (which forms part of the supporting text for both Policy LG7 and Policy LG8 (which does cover limited infilling in villages)).
- 5.2 Clause e) of Policy LG7, however does refer to developments within Green Belt settlement boundaries.
- e) There is a close relationship between the proposed site and existing built up areas, either in settlements excluded from the Green Belt or included in Green Belt Settlement boundaries.*
- 5.3 This enables the development of affordable housing in those villages that are washed over by the Green Belt (as set out in the settlement hierarchy in Table 1.3 of the draft Local Plan), namely:
- Tier 6 Green Belt Villages: Sandridge, Colney Heath (three parts), Lea Valley Estate, Radlett Road, Smallford, Napsbury Park, Sleafshyde, Gustard Wood

Q6 What is the justification for referring to 'affordable-only' housing and setting a threshold of 9 dwellings in Policy LG7? Is this justified and consistent with national planning policy?

What is the justification for referring to 'affordable-only' housing and setting a threshold of 9 dwellings in Policy LG7?

- 6.1 Policy LG7 of the draft Local Plan seeks to set out the application of paragraph 154(f) of the 2023 NPPF in the context of St Albans City and District. Paragraph 154(f) of the 2023 NPPF states:

A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

(f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites);

- 6.2 The threshold of 9 dwellings provides, what SADC considers to be, a reasonable, and effective definition of what limited affordable housing for local community needs means in a St Albans City and District context. It also aligns with the definition of non-major development in the NPPF.
- 6.3 The policy will contribute to meeting the needs for affordable housing in rural communities in the district.
- 6.4 The Glossary of the draft Local Plan provides a definition of affordable homes to enable the effective application of the policy:

Affordable Homes - Housing for sale or for rent for those whose needs are not being met by the market. This includes social rented housing, affordable rented housing and intermediate housing.

Is this justified and consistent with national planning policy?

- 6.5 For the reasons set out above the application of Policy LG7 solely to developments of affordable-only housing of nine or fewer units is considered to be both justified and consistent with national planning policy.

Q7 What is the rationale for Policy LG8, given that the overarching approach in Policy LG5 is to consider development proposals in the Green Belt against national planning policy?⁴

- 7.1 Policy LG5 sets out the overall approach to development in the Green Belt in the district. Policy LG8 (alongside Policies LG7 and LG9) provides specific policies for particular parts of national planning policy where further detail is needed in the context of St Albans City and District.
- 7.2 Policy LG8 of the draft Local Plan seeks to set out the application of paragraph 154(e) of the 2023 NPPF in the context of St Albans City and District. Paragraph 154(e) of the 2023 NPPF states:

A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

(e) limited infilling in villages;

- 7.3 In the context of St Albans City and District it defines the term 'limited infilling'. It is considered important to contextualise the point to this District. This is set out in the supporting text at 3.61:

Limited infilling in villages can accommodate new homes although there is a risk of eroding the character of the village and the openness and character of the Green Belt over time. Clear guidance is needed to assist developers in providing appropriate infill development; whilst providing appropriate protection for the openness and character of the Green Belt which otherwise could be markedly and negatively altered over time.

Q8 Is Policy LG8 consistent with national planning policy, with particular reference to whether the construction of new buildings is regarded as inappropriate development?

- 8.1 Yes, Policy LG8 is considered to be consistent with national policy. The policy itself does not refer to the construction of new buildings as being regarded as inappropriate development, although paragraph 3.60 in the supporting text does say:

While the construction of new buildings is inappropriate in the Green Belt, exceptions includes limited infilling in villages. Green Belt village settlement boundaries are set out on the Policies map.

- 8.2 Paragraph 3.60 is consistent with the exceptions contained within paragraph 154 of the 2023 NPPF.

Q9 What is the justification for using prescribed amounts in Policy LG9? Is this justified, effective or consistent with national planning policy?

What is the justification for using prescribed amounts in Policy LG9?

- 9.1 It is considered that the use of prescribed amounts in Policy LG9 is consistent with the aims of NPPF Chapter 13 'Protecting Green Belt land'; noting the fundamental aim of the Government's Green Belt policy to "prevent urban sprawl by keeping land permanently open" (NPPF paragraph 142). They also apply national policy aims set out in NPPF paragraph 154 to the local context by assisting in identifying whether proposed extensions or replacement buildings constitute 'inappropriate' development.
- 9.2 The relevant parts of NPPF paragraph 154, to which the prescribed amounts in LG9 apply to the local context, are criteria c) and d) as follows:

154. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

...

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;...

9.3 The prescribed amounts in Policy LG9 'Extension or Replacement of Buildings in the Green Belt' are set out in criterion d) Table 3.3 as follows:

How well do the proposals perform in relation to criteria b) and c)?¹¹	Additional size that will be permitted¹²
Poorly	Less than 90m ³ increase in cubic content or Less than 20% increase in floorspace (gross) subject to a maximum increase in cubic content of 300m ³ (whichever is greater)
Moderately	No more than 135m ³ increase in cubic content or No more than 30% increase in floorspace (gross) subject to a maximum increase in cubic content of 300m ³ (whichever is greater)
Well	No more than 180m ³ increase in cubic content or No more than 40% increase in floorspace (gross) subject to a maximum increase in cubic content of 300m ³ (whichever is greater)
Very Well	Above the top of the ranges, or maximum, applicable to Well performing proposals; assessed on a case-by-case basis

11: A judgment will be made on a case by case basis as to how the type of extension (b) and visibility from public viewpoints (c) affects the openness and character of the Green Belt.

12: In the case of extensions, the additional size is measured against the original building as defined in a). In the case of replacement buildings, the additional size is measured against the existing building. Some extensions (eg some roof or porch extensions) may be within the presented size limits but unacceptable when assessed against the design policies in Chapter 12.

- 9.4 These reflect and update to some degree the equivalent size limits in existing Supplementary Planning Guidance (SPG) Residential Extensions and Replacement Dwellings in the Green Belt May 2004² as set out below:

Table 1

How well do the proposals perform in relation to criteria (ii) - (viii) on pages 6-9?	Size of extension that will be permitted
Poorly	Below the bottom of the ranges in Table 2
Moderately	At or towards the bottom of the ranges in Table 2
Well	At or close to the top of the ranges, or maximum, in Table 2
Very well	Above the top of the ranges, or maximum, in Table 2

Table 2

Guidance on size ranges for side and rear extensions *	
Increase in cubic content (cubic metres) **	Percentage increase in floorspace **
90m³ - 180m³	20% - 40% (subject to a maximum increase in cubic content of 300m³)

Footnotes

* *Whichever is the greater of the two ranges (i.e. cubic content or percentage increase in floorspace) will be regarded as the top of the range. The approach of using cubic content as well as floorspace is considered to be a better measure of the overall size and impact of an extension and is consistent with regulations stipulated in the GPDO.*

** *90m³ and 20% = approximately 1.3 times the GPDO Class A permitted development limits for semi detached and detached houses.
180m³, 40% and 300m³ = approximately 2.6 times the GPDO Class A permitted development limits for semi detached and detached houses.*

² SPG available via: <https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/Residential%20extensions%20and%20replacement%20dwellings%20in%20the%20green%20belt%20-%20supplementary%20planning%20guidance.pdf>

- 9.5 The existing equivalent size limits have been consistently referred to and given weight by Inspectors at appeal since adoption of the SPG in May 2004.
- 9.6 The SPG was supplementary to Policy 13 'Extension or Replacement of Dwellings in the Green Belt' of the District Local Plan Review 1994 (LPCD.15.01). The performance of Policy 13 (along with a number of other policies) was specifically monitored between 2007 and 2017 in the Council's Authority Monitoring Reports (AMRs). The AMR 2017³ set out at Appendix 1 (from page 68):

Appendix 1

District Plan Review Policies: Success and Failure Data

The schedule below shows which policies from the St Albans District Local Plan Review 1994 were used in appeal decisions made during 2007-2017 and how successful these policies were. The policies are as referred to in the Council's decision notices, which specify which sub-section applies. However, Inspectors' decisions often refer only to whole policies.

Policy Usage at Appeals 2007-2017

	= Subtotal
	= total of sub-divisions
	= not sub-divided

Policy Number	Times Used	Failed	Upheld	% Upheld
...				
13	134	36	98	73
13 preamble	5	2	3	60
13 i	11	3	8	73
13	150	41	109	73

- 9.7 It is considered that the overall success of Policy 13 in the period 2007-2017, with it being upheld in 73% of cases, indicates the effectiveness of the use of prescribed amounts for Green Belt extensions or replacement buildings in the equivalent existing policy.
- 9.8 The ongoing effectiveness and consistency with national policy of the existing equivalent size limits is demonstrated by the weight given to them when considered in recent appeal decisions which were assessed against the NPPF 2023. Relevant quotes from appeal decisions which were assessed against the NPPF 2023 include the following:

³ SADC Authority Monitoring Report 2017 available via:
<https://www.stalbans.gov.uk/sites/default/files/attachments/AMR%20002%20Authority%27s%20Monitoring%20Report%20%202017.pdf>

- Appeal decision APP/B1930/D/23/3329521 dated 04/07/2024 stated, in relation to a proposal for a house extension:

13. The entirety of the LP is not before me. In its absence I cannot be certain of the full range of LP policies which apply to Green Belt development within the District. However, the content of Policy 13 in respect of residential extensions and replacement dwellings in the Green Belt is consistent with the advice contained within the Framework...

- Appeal decision APP/B1930/W/24/3340875 dated 05/11/2024 stated, in relation to a proposal for a house extension:

9. The Framework does not provide any guidance on interpretation of the phrase 'disproportionate additions'. The Council's 2004 Supplementary Planning Guidance Residential Extensions and Replacement Dwellings in the Green Belt (SPG) allows for extensions of up to 90 - 180m³ more volume or 20 - 40% more floorspace compared to the original building. The higher end of these ranges is reserved for proposals that would otherwise have only minor impacts – for example where the extension would not close down an important gap between buildings. Although the SPG is now about 20 years old, I find this approach to be generally reasonable and applicable.

9.9 The above quotes from appeal decisions which were made against the NPPF 2023 demonstrate the ongoing effectiveness and consistency with national policy of the existing equivalent size limits. It is therefore considered justified to continue to use prescribed amounts for Green Belt Extensions.

9.10 Following the successful approach in the current SPG as set out above, modest updates are included in LG9 when compared with the existing SPG's prescribed amounts which, in summary, seek to:

- Provide additional clarity and effectiveness through condensing the equivalent of the current SPG amounts into a single table; and
- Provide additional clarity and effectiveness through the addition of numerical mid-range maximums of 135m² / 30% for proposals that perform 'moderately' against the relevant criteria (in parts b) and c) of the policy).

Is this justified, effective or consistent with national planning policy?

9.11 Taking the above into account, it is considered that the use of prescribed amounts in Policy LG9 is justified, effective and consistent with national planning policy.